

1333 GOUGH STREET/1481 POST STREET PROJECT



**CITY AND COUNTY OF SAN FRANCISCO
PLANNING DEPARTMENT: CASE NO. 2005.0679E**

STATE CLEARINGHOUSE NO. 2013062028

DRAFT EIR PUBLICATION DATE: JULY 30, 2014

DRAFT EIR PUBLIC HEARING DATE: SEPTEMBER 4, 2014

DRAFT EIR PUBLIC COMMENT PERIOD: JULY 31, 2014 - SEPTEMBER 15, 2014

Written comments should be sent to:

Sarah B. Jones
Environmental Review Officer
San Francisco Planning Department
1650 Mission Street, Suite 400
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SAN FRANCISCO PLANNING DEPARTMENT

DATE: July 30, 2014

TO: Distribution List for the 1333 Gough Street/1481 Post Street Project Draft EIR

FROM: Sarah B. Jones, Environmental Review Officer

SUBJECT: Request for the Final Environmental Impact Report for the 1333 Gough Street/1481 Post Street Project (Planning Department File No. 2005.0679E)

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This is the Draft of the Environmental Impact Report (EIR) for the 1333 Gough Street/1481 Post Street 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 titled "Responses to Comments," which will contain all relevant comments on this Draft EIR and our responses to those comments. It may also specify changes to this Draft EIR. Those who testify at the hearing on the Draft EIR will automatically receive a copy of the Responses to Comments document, along with notice of the date reserved for certification; others may receive a copy of the Responses to Comments document and notice by request or by visiting our office. This Draft EIR together with the Responses to Comments document will be considered by the Planning Commission in an advertised public meeting and will be certified as a Final EIR if deemed adequate.

After certification, we will modify the Draft EIR as specified by the Responses to Comments document and print both documents in a single publication called the Final EIR. The Final EIR will add no new information to the combination of the two documents except to reproduce the certification resolution. It will simply provide the information in one document, rather than two. Therefore, if you receive a copy of the Responses to Comments document in addition to this copy of the Draft EIR, you will technically have a copy of the Final EIR.

We are aware that many people who receive the Draft EIR and Responses to Comments document have no interest in receiving virtually the same information after the EIR has been certified. To avoid expending money and paper needlessly, we would like to send copies of the Final EIR [in Adobe Acrobat format on a CD] to private individuals only if they request them. Therefore, if you would like a copy of the Final EIR, please fill out and mail the postcard provided inside the back cover to the Environmental Planning division of the Planning Department within two weeks after certification of the EIR. Any private party not requesting a Final EIR by that time will not be mailed a copy. Public agencies on the distribution list will automatically receive a copy of the Final EIR.

Thank you for your interest in this project.

1333 GOUGH STREET/1481 POST STREET PROJECT

DRAFT ENVIRONMENTAL IMPACT REPORT

CITY AND COUNTY OF SAN FRANCISCO
PLANNING DEPARTMENT: CASE NO. 2005.0679E

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SUMMARY

This Summary chapter is intended to highlight major areas of importance in the environmental analysis as required by Section 15123 of the *California Environmental Quality Act Guidelines (CEQA Guidelines)*. This chapter briefly summarizes the 1333 Gough Street/1481 Post Street Project (referred to in this Environmental Impact Report [EIR] as “the proposed project”) and three project variants. Following the synopsis of the proposed project and project variants, a summary table presents the environmental impacts of the proposed project identified in the EIR, the significant impacts identified in the Notice of Preparation/Initial Study, and mitigation measures identified to reduce or lessen significant impacts. Another summary table presents improvement measures identified to reduce less-than-significant impacts of the proposed project. Following these summary tables is a description of the alternatives to the proposed project that are addressed in this EIR and a table comparing the impacts of those alternatives with the proposed project. The final subsection in this chapter is a summary of environmental issues to be resolved and areas of known controversy.

Table S.1: Summary of Impacts of Proposed Project Identified in the EIR, beginning on p. S.6, provides an overview of the following:

- Environmental impacts with the potential to occur as a result of the proposed project;
- The level of significance of the environmental impacts before implementation of any applicable mitigation measures;
- Mitigation measures that would avoid or reduce significant environmental impacts;
- The level of significance for each impact after implementation of any applicable mitigation measures.

S.1. PROJECT SYNOPSIS

The project site is owned by Cathedral Hill Associates, L.P., an affiliate of ADCO (the project sponsor). The project site is located on the south side of Post Street near the intersection of Post and Gough Streets in Cathedral Hill, at the eastern edge of the Japantown neighborhood, in the City’s Western Addition. The project site is a single lot encompassing all of Assessor’s Block 697/Lot 37, bounded by Post Street on the north, Gough Street on the east, Geary Boulevard on the south, and its west property line. The eastern portion of the project site is currently developed with an existing residential building, 1333 Gough Street, constructed in 1965 (169 units, 14 stories, about 138 feet tall, and 214,400 gross square feet [gsf] of residential use). An existing parking garage structure (163 spaces, 65,100 gsf) wraps around the ground-floor base of 1333 Gough Street to its north, west, and south. Two surface parking lots at the northeast and southeast corners of the project site together provide 13 spaces. The private, members-only

Cathedral Hill Plaza Athletic Club operates a fitness center (about 4,700 gsf) in the ground floor of 1333 Gough Street. A terrace for the residents of 1333 Gough Street, two outdoor tennis courts, and a one-story pool building (permanently closed in February 2010) are located on the roof of the parking structure.

The project sponsor proposes demolition of the existing parking structure (together with the common open space terrace, tennis courts, and pool building that sit atop the parking structure) and construction of a new 262-unit, 36-story, 398-foot-tall (416 feet tall including an 18-foot-tall mechanical penthouse), 437,500-gsf residential building (the proposed 1481 Post Street building) west of 1333 Gough Street on the project site. The new building would include a 2,230-gsf café along Post Street at the northwest corner of the project site. Along the west property line on the project site, the proposed project would include a 10-foot-wide, publicly accessible walkway that would provide midblock pedestrian passage between Post Street and Geary Boulevard.

The proposed project also includes construction of a subsurface parking garage (about 180,000 gsf) to serve the residents of the proposed 1481 Post Street building and to replace the existing parking for the 1333 Gough Street building that would be demolished under the proposed project. The four-level 1481 Post Street portion of the proposed parking garage would occupy the western portion of the project site and would include 262 independently accessible parking spaces for use by the residents of 1481 Post. The two-level 1333 Gough Street portion of the garage would generally occupy the eastern portion of the project site, and would include 176 independently accessible parking spaces to replace the existing 176 independently accessible spaces currently serving 1333 Gough and 4 carshare spaces. Access to and egress from the parking areas for 1481 Post would be physically separated from the parking areas for 1333 Gough. The 1481 Post portion of the garage would solely have access from, and egress to, Post Street. The 1333 Gough portion of the garage would solely have access from, and egress to, Post Street and Gough Street at the northeast corner of the project site. The two portions of the garage would also be physically separated within the below-grade structure, such that cars within the 1333 Gough portion of the garage could not circulate within the 1481 Post Street portion of the garage.

The proposed project includes renovation of the existing fitness center at the ground floor of 1333 Gough Street and construction of a new indoor swimming pool addition (about 8,000 gsf) fronting Geary Boulevard. The upgraded facility would continue to be open to the public for membership. The existing tennis courts would not be replaced under the proposed project. A common second-floor open space terrace for the residents of the proposed 1481 Post Street building would be provided atop the loading area, the 1481 Post Street garage ramp and driveway, and the proposed pool addition. Another common open space for 1481 Post Street residents would be provided atop the proposed café. A separate common open space garden for residents of 1333 Gough Street would be provided at ground level along Gough Street.

In addition to the characteristics of the proposed project as described in **Chapter 2, Planning** Department staff have included three optional site plan schemes for study in this EIR that reflect design variations to the site plan's public realm improvements:

- **Variant A – Sidewalk Widening Project Variant.** Under this variant, the Post Street, Gough Street, and Geary Boulevard sidewalks would be widened along their entire lengths fronting the project site, eliminating all 39 existing parking spaces. Vehicles would enter the 1481 Post Street portion of the project site through a 12-foot-wide curb cut entrance along Post Street, compared to a 20-foot-wide entrance driveway for the 1481 Post Street building under the proposed project.
- **Variant B – 1481 Post Street Curb Cut and Sidewalk Widening Project Variant.** Under Variant B, vehicular access to the 1481 Post Street portion of the project site would be reconfigured. Vehicles would enter and exit the 1481 Post Street portion of the project site through a single, two-way, 30-foot-wide curb cut entrance along Post Street as opposed to two separate entrance and exit driveways for the proposed 1481 Post Street building. This variant also includes the same sidewalk widening and elimination of parking spaces as under Variant A.
- **Variant C – 1333 Gough Street Curb Cut and Sidewalk Widening Project Variant.** Under Variant C, vehicular access to the 1333 Gough Street portion of the project site would be reconfigured. The proposed two-way, 24-foot-wide curb cut entrance/exit along Post Street at the northeast corner of the project site would not be constructed. Instead, vehicles would enter and exit the 1333 Gough Street portion of the project site through the existing, two-way, 27-foot-wide curb cut entrance/exit along Gough Street at the northeast corner of the project site. This variant also includes the same sidewalk widening and elimination of parking spaces as under Variants A and B.

In all other respects, these variants would be the same as the proposed project.

Required approvals for the proposed project include, but are not limited to, the following: a Zoning Map amendment to reclassify the existing 240-E height and bulk limit for the project site to a 410-G height and bulk limit; a *General Plan* amendment to revise the 240-foot height limit and the bulk controls for the project site; a determination under Planning Code Section 295; Conditional Use authorization to construct a building exceeding a height of 50 feet in an RM-4 (Residential, Mixed, High Density) Zoning District; and approval of a Planned Unit Development to allow modifications to provisions of the Planning Code governing rear yard depth (Planning Code Section 134) and dwelling unit exposure (Planning Code Section 140).

S.2. SUMMARY OF IMPACTS AND MITIGATION MEASURES

The Planning Department published a Notice of Preparation/Initial Study (NOP/IS) on June 12, 2013, announcing its intent to prepare and distribute a focused EIR (the NOP/IS is presented as **Appendix A** to this EIR). Topics analyzed in the EIR are Land Use and Land Use Planning (except for the subtopic concerning division of an established community); Transportation and Circulation; Noise; Air Quality; and Wind and Shadow.

On September 27, 2013, Governor Brown signed Senate Bill (SB) 743, which became effective on January 1, 2014. Among other things, SB 743 added Section 21099 to the Public Resources Code and eliminated the analysis of aesthetics and parking impacts for certain urban infill projects under the California Environmental Quality Act (CEQA). The proposed project meets the definition of a mixed-use residential project on an infill site within a transit priority area as specified by Section 21099. Accordingly, this EIR does not contain a separate discussion of the topic of Aesthetics, which can no longer be considered in determining the significance of the proposed project's physical environmental effects under CEQA. The EIR nonetheless provides visual simulations for informational purposes as part of **Chapter 2, Project Description**. Similarly, the EIR includes a discussion of parking for informational purposes in **Section 4.C, Transportation and Circulation**. This information, however, does not relate to the significance determinations in the EIR.

All impacts of the proposed project and associated mitigation measures identified in this EIR are summarized in **Table S.1**. These impacts are listed in the same order as they appear in the text of **Chapter 4, Environmental Setting, Impacts, and Mitigation**, of this EIR. For the topics evaluated in the EIR, the levels of significance of impacts are identified as:

- **No Impact** – No adverse changes (or impacts) to the environment are expected.
- **Less Than Significant** – Impact that 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.
- **Less Than Significant with Mitigation** – Impact that is reduced to a less-than-significant level through implementation of the identified mitigation measures.
- **Significant and Unavoidable with Mitigation** – Impact that exceeds the defined significance criteria and can be reduced through compliance with existing local, state, and federal laws and regulations and/or implementation of all feasible mitigation measures, but cannot be reduced to a less-than-significant level.
- **Significant and Unavoidable** – Impact that exceeds the defined significance criteria and cannot be eliminated or reduced to a less-than-significant level through compliance with existing local, state, and federal laws and regulations and for which there are no feasible mitigation measures.

Where applicable, this table identifies project revisions or conditions, expressed as mitigation measures, which would reduce the identified impact(s) to less-than-significant levels. The impact's level of significance after implementation of the required mitigation measure is provided in the column labeled "Level of Significance After Mitigation." Beginning on p. S.17, **Table S.1** also summarizes the significant impacts identified in the NOP/IS and presents mitigation measures that would reduce these impacts to less-than-significant levels.

Where called for, improvement measures are also identified in Chapter 4 to reduce the effects of impacts that would be less than significant. **Table S.2: Summary of Improvement Measures**, pp. S.24-S.29, summarizes these measures.

These summary tables are presented for the reader as an overview of project impacts, mitigation measures, and improvement measures. Please see the relevant environmental topic sections in **Chapter 4, Environmental Setting, Impacts, and Mitigation**, and in the NOP/IS, Section E. Evaluation of Environmental Effects (**Appendix A**), for a thorough discussion and analysis of the impacts of the proposed project, and the mitigation measures identified to address those impacts.

Table S.1: Summary of Impacts of Proposed Project Identified in the EIR

Impact	Level of Significance before Mitigation	Mitigation Measures	Level of Significance after Mitigation
<i>Legend:</i> NI = No Impact; LS = Less than Significant; S = Significant; SU = Significant and unavoidable impact with mitigation; SUM = Significant and unavoidable impact with mitigation; NA = Not Applicable			
Land Use and Land Use Planning			
LU-1: The proposed project would not conflict with <i>General Plan</i> objectives and policies, adopted for the purpose of avoiding or mitigating an environmental effect under CEQA.	LS	None required.	LS
LU-2: The proposed project would not have a substantial impact on the existing character of the vicinity.	LS	None required.	LS
C-LU-1: The proposed project in combination with past, present, or reasonably foreseeable future projects would not contribute considerably to significant cumulative land use impacts related to (a) conflicts with applicable land use plans and policies adopted for the purpose of avoiding or mitigating an environmental effect, or (b) substantial impacts on the existing character of the site vicinity.	LS	None required.	LS
Transportation and Circulation			
TR-1: The proposed project or its variants would not cause a substantial increase in traffic that would cause the level of service to <i>cont'd.</i>	LS	None required.	LS

Summary
Table S.1 (Continued)

Impact	Level of Significance before Mitigation	Mitigation Measures	Level of Significance after Mitigation
<i>Legend:</i> NI = No Impact; LS = Less than Significant; S = Significant; SU = Significant and unavoidable impact; SUM = Significant and unavoidable impact with mitigation; NA = Not Applicable			
<i>cont'd.</i> decline from LOS D or better to LOS E or F, or from LOS E to F, at the ten study intersections in the project vicinity.			
TR-2: The proposed project or its variants would not result in a substantial increase in transit demand that could not be accommodated by adjacent local and regional transit capacity, nor would it cause a substantial increase in delays or operating costs such that significant adverse impacts to local or regional transit service could occur.	LS	None required.	LS
TR-3: The proposed project or its variants would not result in a substantial overcrowding on public sidewalks, nor create potentially hazardous conditions for pedestrians, or otherwise interfere with pedestrian accessibility on the site and adjoining areas.	LS	None required.	LS
TR-4: The proposed project or its variants would not result in potentially hazardous conditions for bicyclists, or otherwise substantially interfere with bicycle accessibility to the site and adjoining areas.	LS	None required.	LS

Summary
Table S.1 (Continued)

Impact	Level of Significance before Mitigation	Mitigation Measures	Level of Significance after Mitigation
<i>Legend:</i> NI = No Impact; LS = Less than Significant; S = Significant; SU = Significant and unavoidable impact; SUM = Significant and unavoidable impact with mitigation; NA = Not Applicable			
TR-5: The loading demand for the proposed project or its variants would be accommodated within the proposed on-site loading facilities, and would not create potentially hazardous conditions or significant delays for traffic, transit, bicyclists or pedestrians.	LS	None required.	LS
TR-6: The proposed project or its variants would not result in significant impacts on emergency vehicle access.	LS	None required.	LS
TR-7: The proposed project or its variants would not result in construction-related transportation impacts because of their temporary and limited duration.	LS	None required.	LS
C-TR-1: The proposed project or its variants, in combination with past, present and reasonably foreseeable future development, would not contribute considerably to significant cumulative traffic impacts.	LS	None required.	LS
C-TR-2: The proposed project or its variants, in combination with past, present and reasonably foreseeable development, would not contribute to significant cumulative transit impacts on local or regional transit capacity.	LS	None required.	LS

Summary
Table S.1 (Continued)

Impact	Level of Significance before Mitigation	Mitigation Measures	Level of Significance after Mitigation
<i>Legend:</i> NI = No Impact; LS = Less than Significant; S = Significant; SU = Significant and unavoidable impact; SUM = Significant and unavoidable impact with mitigation; NA = Not Applicable			
C-TR-3: The proposed project or its variants, in combination with past, present and reasonably foreseeable future development in the project vicinity, would not contribute considerably to any significant cumulative pedestrian impacts.	LS	None required.	LS
C-TR-4: The proposed project or its variants, in combination with past, present and reasonably foreseeable future development in the project vicinity, would not contribute considerably to any significant cumulative bicycle impacts.	LS	None required.	LS
C-TR-5: The proposed project or its variants, in combination with past, present and reasonably foreseeable future development in the project vicinity, would not contribute considerably to any significant cumulative loading impacts.	LS	None required.	LS
C-TR-6: The proposed project or its variants, in combination with past, present and reasonably foreseeable future development in the project vicinity, would not contribute considerably to any significant cumulative emergency vehicle access impacts.	LS	None required.	LS

Summary
Table S.1 (Continued)

Impact	Level of Significance before Mitigation	Mitigation Measures	Level of Significance after Mitigation
<i>Legend:</i> NI = No Impact; LS = Less than Significant; S = Significant; SU = Significant and unavoidable impact; SUM = Significant and unavoidable impact with mitigation; NA = Not Applicable			
C-TR-7: The proposed project or its variants, in combination with past, present and reasonably foreseeable future development in the project vicinity, would not contribute considerably to any significant cumulative construction-related transportation impacts.	LS	None required.	LS
Noise			
NO-1: Construction of the proposed project would result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project.	S	<p>Mitigation Measure M-NO-1: Construction Noise Control Measures</p> <p>The following practices shall be incorporated into the construction contract agreement documents to be implemented by the construction contractor:</p> <ul style="list-style-type: none"> • Provide best available noise control techniques for equipment and trucks, such as providing acoustic enclosures and mufflers for stationary equipment, shroud or shield impact tools, and installing barriers around particularly noisy activities at the construction sites so that the line of sight between the construction activities and nearby sensitive receptor locations is blocked to the maximum feasible extent. The placement of barriers or acoustic blankets shall be reviewed and approved by the Director of Public Works or the Director of Building Inspection prior to issuance of permits for construction activities. • Install temporary noise barriers along the boundaries of the project site to shield potential sensitive receptors and reduce noise levels. • Locate stationary equipment, stockpile and staging areas, and noise sources (such as compressors) as far as practicable from sensitive receptors in the buildings at 1333 Gough Street and at 1400 Geary Boulevard (The Sequoias). The best available noise control techniques to muffle such noise sources and construct barriers around such sources and/or the construction site shall be designed to reduce construction noise by at least 5 dBA. Examples of suitable materials for solid noise barriers to enclose sources include plywood (e.g., 1-inch thick), steel (e.g., 16-gauge), concrete, or heavy vinyl noise curtain material (e.g., SoundSeal BBC-13-2" or equivalent). To further reduce noise, the contractor shall 	LS
<i>cont'd.</i>			

Summary
Table S.1 (Continued)

Impact	Level of Significance before Mitigation	Mitigation Measures	Level of Significance after Mitigation
<p><i>Legend:</i> NI = No Impact; LS = Less than Significant; S = Significant; SU = Significant and unavoidable impact; SUM = Significant and unavoidable impact with mitigation; NA = Not Applicable</p> <p><i>cont'd.</i></p>			
		<p>locate stationary equipment in pit areas or excavated areas, if feasible.</p> <ul style="list-style-type: none"> Where use of pneumatic tools, such as impact tools (e.g., jack hammers and pavement breakers), is unavoidable, a noise source screen such as a barrier around the activity using the tools, an external noise jacket, or an exhaust muffler on the compressed air exhaust shall be used and shall be designed to reduce noise levels from the source by 10 dBA. Use construction equipment with lower noise emission ratings whenever possible, particularly for air compressors. Provide sound-control devices on equipment no less effective than those provided by the manufacturer. Prohibit unnecessary idling of internal combustion engines. Require applicable construction-related vehicles and equipment to use designated truck routes to access the project sites. Prior to the issuance of the building permit, along with the submission of construction documents, the project sponsor shall designate a Noise Disturbance Coordinator (on-site construction complaint and enforcement manager) and submit to the Planning Department and Department of Building Inspection (DBI) a protocol to respond to and track complaints pertaining to construction noise. This shall include (1) a procedure and phone numbers for the Noise Disturbance Coordinator to notify DBI, the Department of Public Health, and the Police Department (during regular construction hours and off-hours); (2) a sign conspicuously posted on-site describing noise complaint procedures and a complaint hotline number that shall be answered at all times during construction; (3) identification of the Noise Disturbance Coordinator for the project (name, phone number, email address); and (4) notification of property owners and occupants within 300 feet of the project construction area at least 14 days in advance of extreme noise-generating activities (activities expected to generate levels of 90 dBA or greater) about the estimated duration of the activity. 	

Summary
Table S.1 (Continued)

Impact	Level of Significance before Mitigation	Mitigation Measures	Level of Significance after Mitigation
<i>Legend:</i> NI = No Impact; LS = Less than Significant; S = Significant; SU = Significant and unavoidable impact; SUM = Significant and unavoidable impact with mitigation; NA = Not Applicable			
NO-2: Construction of the proposed project would result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels.	S	<p>Mitigation Measure M-NO-2a: Minimize Vibration Levels During Construction</p> <p>The following practices shall be incorporated into the construction contract agreement documents to be implemented by the construction contractor:</p> <ul style="list-style-type: none"> • Make the Noise Disturbance Coordinator (see Mitigation Measure M-NO-1) available to respond to vibration complaints from nearby vibration-sensitive uses, and submit to the Planning Department and Department of Building Inspection (DBI) a protocol to respond to and track complaints pertaining to vibration. Recurring disturbances shall be evaluated by a qualified acoustical consultant to ensure compliance with applicable standards; • Select demolition methods not involving impact tools, where possible; • Avoid vibratory rollers and packers, where possible; • Operate earth-moving equipment as far away from vibration-sensitive receptors as possible, and prioritize use of smaller, lighter-duty equipment when operation is necessary within 45 feet of sensitive receptors in existing buildings (1333 Gough Street and The Sequoias health center facility at 1400 Geary Boulevard); and • Phase demolition and ground-impacting activity (excavation and shoring) to reduce occurrences in the same time period, when and where feasible. <p>Mitigation Measure M-NO-2b: Pre-Construction Assessment to Protect Structures from Ground Vibration During Below-Grade Work</p> <p>The project sponsor shall retain a qualified geotechnical engineer to conduct a pre-construction assessment of existing subsurface conditions and the structural integrity of nearby buildings subject to ground vibration prior to receiving a building permit. If recommended by the geotechnical engineer, for structures or facilities within 10 feet of below-grade activities (1333 Gough Street and The Sequoias health center facility at 1400 Geary Boulevard), the project sponsor shall require groundborne vibration monitoring of nearby structures. The assessment shall be based on the specific conditions at the construction site such as, but not limited to, the following:</p> <ul style="list-style-type: none"> • Pre-construction surveying of potentially affected structures; 	LS
<i>cont'd.</i>			

Summary
Table S.1 (Continued)

Impact	Level of Significance before Mitigation	Mitigation Measures	Level of Significance after Mitigation
<p><i>Legend:</i> NI = No Impact; LS = Less than Significant; S = Significant; SU = Significant and unavoidable impact; SUM = Significant and unavoidable impact with mitigation; NA = Not Applicable</p> <p><i>cont'd.</i></p>			
		<ul style="list-style-type: none"> Underpinning of foundations of potentially affected structures, as determined necessary by the qualified geotechnical engineer; The need for a monitoring program during vibration-causing construction activities to detect ground settlement or lateral movement of structures in the vicinity of demolition, excavation, or shoring. If the engineer determines vibration monitoring is needed, the results of ground vibration monitoring shall be submitted to the Department of Building Inspection (DBI). In the event of unacceptable ground movement, as determined by the DBI, demolition or excavation shall cease and corrective measures shall be implemented. Corrective measures to reduce ground movement from demolition or excavation include use of non-impact demolition tools and adding protective shoring. Ground stabilization measures shall be reevaluated and approved by the Director of Building Inspection. 	LS
NO-3: Operation of the proposed project would not generate noise levels in excess of standards established in the <i>San Francisco General Plan</i> or Noise Ordinance and would not result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project.	LS	None required.	LS
NO-4: The proposed project's new residential uses and open spaces would not be substantially affected by existing noise levels.	LS	None required.	LS
NO-5: Operation of the proposed project would not generate excessive groundborne vibration.	LS	None required.	LS

Summary
Table S.1 (Continued)

Impact	Level of Significance before Mitigation	Mitigation Measures	Level of Significance after Mitigation
<i>Legend:</i> NI = No Impact; LS = Less than Significant; S = Significant; SU = Significant and unavoidable impact; SUM = Significant and unavoidable impact with mitigation; NA = Not Applicable			
C-NO-1: Construction of the proposed project in combination with other past, present, and reasonably foreseeable future projects in the project vicinity would result in a cumulatively considerable contribution to significant temporary or periodic cumulative increases in ambient noise and vibration levels in the project vicinity above levels existing without the proposed project.	S	Implement M-NO-1: General Construction Noise Control Measures , above.	LS
C-NO-2: Operation of the proposed project, in combination with other past, present, and reasonably foreseeable future projects in the project vicinity, would not result in a cumulatively considerable contribution to significant cumulative permanent increases in ambient noise levels in the project vicinity above levels existing without the project.	LS	None required.	LS
Air Quality			
AQ-1: The proposed project's construction activities would generate fugitive dust and criteria air pollutants, and would violate an air quality standard, contribute substantially to an existing or <i>cont'd.</i>	S	Mitigation Measure M-AQ-1: Construction Emissions Minimization Plan Prior to issuance of a construction permit, the project sponsor shall submit a Construction Emissions Minimization Plan to the Environmental Review Officer for review and approval by and Environmental Planning Air Quality Specialist. The Plan shall detail compliance with the following requirements: <ul style="list-style-type: none"> • All off-road construction diesel engines not registered under California Air Resources 	LS

Summary
Table S.1 (Continued)

Impact	Level of Significance before Mitigation	Mitigation Measures	Level of Significance after Mitigation
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cont'd. projected air quality violation, and result in a cumulatively considerable net increase in criteria air pollutants.		Board's statewide Portable Equipment Registration Program, which have a rating of 50 horsepower or more and 750 horsepower or less, shall meet, at a minimum, the Tier 3 California Emission Standards for Off-road Compression-Ignition Engines as specified in California Code of Regulations, Title 13, § 2423(b)(1). If a Tier 3 or Tier 3-equivalent engine is not available for a particular item of equipment, Tier 2 compliant engines shall be allowed on a case by case basis, as determined by the Planning Department. <ul style="list-style-type: none"> • All equipment shall be turned off when not in use. Engine idling of all equipment shall be minimized. • All equipment engines shall be maintained in good operating condition and in proper tune per manufacturers' specification. 	
AQ-2: The proposed project's construction activities would generate toxic air contaminants, including diesel particulate matter, but would not expose sensitive receptors to substantial pollutant concentrations.	LS	None required.	LS
AQ-3: 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.	LS	None required.	LS
AQ-4: During project operations, the proposed project would generate toxic air contaminants, including diesel particulate matter, cont'd.	LS	None required.	LS

Summary
Table S.1 (Continued)

Impact	Level of Significance before Mitigation	Mitigation Measures	Level of Significance after Mitigation
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cont'd. but would not expose sensitive receptors to substantial air pollutant concentrations.			
AQ-5: The proposed project would not conflict with, or obstruct implementation of, the <i>Bay Area 2010 Clean Air Plan</i> .	LS	None required.	LS
C-AQ-1: The proposed project in combination with past, present, and reasonably foreseeable future development in the project area would result in less-than-significant cumulative air quality impacts.	LS	None required.	LS
Wind and Shadow			
WS-1: The proposed project would not alter wind in a manner that substantially affects public areas.	LS	None required.	LS
C-WS-1: The proposed project in combination with past, present, and reasonably foreseeable future projects in the project vicinity would not make a cumulatively considerable contribution to a significant cumulative wind impact.	LS	None required.	LS
WS-2: The proposed project would not create new shadow in a manner that substantially affects outdoor recreation facilities or other public areas.	LS	None required.	LS

Summary
Table S.1 (Continued)

Impact	Level of Significance before Mitigation	Mitigation Measures	Level of Significance after Mitigation
<i>Legend:</i> NI = No Impact; LS = Less than Significant; S = Significant; SU = Significant and unavoidable impact; SUM = Significant and unavoidable impact with mitigation; NA = Not Applicable			
C-WS-2: The proposed project in combination with past, present, and reasonably foreseeable future projects in the project vicinity would not create new shadow in a manner that substantially affects outdoor recreation facilities or other public areas. The proposed project would not make a cumulatively considerable contribution to a significant cumulative shadow impact.	LS	None required.	LS
Summary of Significant Impacts of Proposed Project Identified in the Notice of Preparation/Initial Study			
Impact	Level of Significance before Mitigation	Mitigation Measures	Level of Significance after Mitigation
<i>Legend:</i> NI = No Impact; LS = Less than Significant; S = Significant; SU = Significant and unavoidable adverse impact, no feasible mitigation; NA = Not Applicable			
Cultural and Paleontological Resources			
CP-2: Construction activities for the proposed project could cause a substantial adverse change in the significance of archaeological resources, if such resources are present within the project site.	S	Mitigation Measure M-CP-2: Archaeological Testing, Monitoring, Data Recovery and Reporting Based on a reasonable presumption that archaeological resources may be present within the project site, 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 archaeological consultant from the pool of qualified archaeological consultants maintained by the Planning Department archaeologist. The archaeological consultant shall undertake an archaeological testing program as specified herein. In addition, the consultant shall be available to conduct an archaeological monitoring and/or data recovery program if required pursuant to this measure. The archaeological consultant's work shall be conducted in accordance with this measure and with the requirements of the project archaeological research design and treatment plan (Archeo-Tec, <i>Archaeological Research Design</i>)	LS
<i>cont'd.</i>			

Summary
Table S.1 (Continued)

Impact	Level of Significance before Mitigation	Mitigation Measures	Level of Significance after Mitigation
<i>cont'd.</i>	Legend: NI = No Impact; LS = Less than Significant; S = Significant; SU = Significant and unavoidable adverse impact, no feasible mitigation; NA = Not Applicable	<p><i>and Treatment Plan for the 1333 Gough Street at Post Project, June 2007</i>) at the direction of the Environmental Review Officer (ERO). In instances of inconsistency between the requirement of the project archaeological research design and treatment plan and of this archaeological mitigation measure, the requirements of this archaeological mitigation measure shall prevail. 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. Archaeological 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 archaeological resource as defined in CEQA Guidelines Sect. 15064.5 (a) and (c).</p> <p><u>Consultation with Descendant Communities</u></p> <p>On discovery of an archaeological site¹ associated with descendant Native Americans or the Overseas Chinese an appropriate representative² of the descendant group and the ERO shall be contacted. The representative of the descendant group shall be given the opportunity to monitor archaeological field investigations of the site and to consult with ERO regarding appropriate archaeological treatment of the site, of recovered data from the site, and, if applicable, any interpretative treatment of the associated archaeological site. A copy of the Final Archaeological Resources Report shall be provided to the representative of the descendant group.</p> <p><u>Archaeological Testing Program</u></p> <p>The archaeological consultant shall prepare and submit to the ERO for review and approval an archaeological testing plan (ATP). The archaeological testing program shall be conducted in accordance with the approved ATP. The ATP shall identify the property types of the expected archaeological 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 archaeological testing program will be to determine to the extent possible the presence or absence</p>	
<i>cont'd.</i>			

¹ The term "archaeological site" is intended here to minimally include any archaeological deposit, feature, burial, or evidence of burial.

² 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.

Summary
Table S.1 (Continued)

Impact	Level of Significance before Mitigation	Mitigation Measures	Level of Significance after Mitigation
<p><i>cont'd.</i></p> <p><i>Legend:</i> NI = No Impact; LS = Less than Significant; S = Significant; SU = Significant and unavoidable adverse impact, no feasible mitigation; NA = Not Applicable</p>		<p>of archaeological resources and to identify and to evaluate whether any archaeological resource encountered on the site constitutes an historical resource under CEQA.</p> <p>At the completion of the archaeological testing program, the archaeological consultant shall submit a written report of the findings to the ERO. If based on the archaeological testing program the archaeological consultant finds that significant archaeological resources may be present, the ERO in consultation with the archaeological consultant shall determine if additional measures are warranted. Additional measures that may be undertaken include additional archaeological testing, archaeological monitoring, and/or an archaeological data recovery program. If the ERO determines that a significant archaeological resource is present and that the resource could be adversely affected by the proposed project, at the discretion of the project sponsor either:</p> <p>A) The proposed project shall be re-designed so as to avoid any adverse effect on the significant archaeological resource; or</p> <p>B) A data recovery program shall be implemented, unless the ERO determines that the archaeological resource is of greater interpretive than research significance and that interpretive use of the resource is feasible.</p> <p><u>Archaeological Monitoring Program</u></p> <p>If the ERO in consultation with the archaeological consultant determines that an archaeological monitoring program (AMP) shall be implemented the archaeological monitoring program shall minimally include the following provisions:</p> <ul style="list-style-type: none"> • The archaeological 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 archaeological consultant shall determine what project activities shall be archaeologically monitored. In most cases, any soils-disturbing activities, such as demolition, foundation removal, excavation, grading, utilities installation, foundation work, driving of piles (foundation, shoring, etc.), site remediation, etc., shall require archaeological monitoring because of the risk these activities pose to potential archaeological resources and to their depositional context; • The archaeological 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 archaeological resource; • The archaeological monitor(s) shall be present on the project site according to a schedule 	
<p><i>cont'd.</i></p>			

Summary
Table S.1 (Continued)

Impact	Level of Significance before Mitigation	Mitigation Measures	Level of Significance after Mitigation
<i>cont'd.</i>	Legend: NI = No Impact; LS = Less than Significant; S = Significant; SU = Significant and unavoidable adverse impact, no feasible mitigation; NA = Not Applicable	<p>agreed upon by the archaeological consultant and the ERO until the ERO has, in consultation with project archaeological consultant, determined that project construction activities could have no effects on significant archaeological deposits;</p> <ul style="list-style-type: none"> • The archaeological monitor shall record and be authorized to collect soil samples and artifactual/ecofactual material as warranted for analysis; • If an intact archaeological deposit is encountered, all soils-disturbing activities in the vicinity of the deposit shall cease. The archaeological monitor shall be empowered to temporarily redirect demolition/excavation/pile driving/construction activities and equipment until the deposit is evaluated. If in the case of pile driving activity (foundation, shoring, etc.), the archaeological monitor has cause to believe that the pile driving activity may affect an archaeological resource, the pile driving activity shall be terminated until an appropriate evaluation of the resource has been made in consultation with the ERO. The archaeological consultant shall immediately notify the ERO of the encountered archaeological deposit. The archaeological consultant shall make a reasonable effort to assess the identity, integrity, and significance of the encountered archaeological deposit, and present the findings of this assessment to the ERO. <p>Whether or not significant archaeological resources are encountered, the archaeological consultant shall submit a written report of the findings of the monitoring program to the ERO. <u>Archaeological Data Recovery Program</u></p> <p>If the ERO, in consultation with the archaeological consultant, determines that archaeological data recovery programs shall be implemented, the archaeological data recovery program shall be conducted in accord with an archaeological data recovery plan (ADRP). The archaeological consultant, project sponsor, and ERO shall meet and consult on the scope of the ADRP prior to preparation of a draft ADRP. The archaeological 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 archaeological 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 archaeological resources if nondestructive methods are practical.</p> <p>The scope of the ADRP shall include the following elements:</p> 	
<i>cont'd.</i>			

Summary
Table S.1 (Continued)

Impact	Level of Significance before Mitigation	Mitigation Measures	Level of Significance after Mitigation
<p><i>cont'd.</i></p> <p><i>Legend:</i> NI = No Impact; LS = Less than Significant; S = Significant; SU = Significant and unavoidable adverse impact, no feasible mitigation; NA = Not Applicable</p>		<ul style="list-style-type: none"> • <i>Field Methods and Procedures.</i> Descriptions of proposed field strategies, procedures, and operations. • <i>Cataloguing and Laboratory Analysis.</i> Description of selected cataloguing system and artifact analysis procedures. • <i>Discard and Deaccession Policy.</i> Description of and rationale for field and post-field discard and deaccession policies. • <i>Interpretive Program.</i> Consideration of an on-site/off-site public interpretive program during the course of the archaeological data recovery program. • <i>Security Measures.</i> Recommended security measures to protect the archaeological resource from vandalism, looting, and non-intentionally damaging activities. • <i>Final Report.</i> Description of proposed report format and distribution of results. • <i>Curation.</i> 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. <p><u>Human Remains and Associated or Unassociated Funerary Objects</u></p> <p>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 in the event of the Coroner's determination that the human remains are Native American remains, notification of the California State Native American Heritage Commission (NAHC) who shall appoint a Most Likely Descendant (MLD) (Pub. Res. Code Sec. 5097.98). The archaeological consultant, project sponsor, and MLD shall make all reasonable efforts to develop an agreement for the treatment of, with appropriate dignity, human remains and associated or unassociated funerary objects (CEQA Guidelines Sec. 15064.5(d)). The agreement should take into consideration the appropriate excavation, removal, recordation, analysis, custodianship, curation, and final disposition of the human remains and associated or unassociated funerary objects.</p> <p><u>Final Archaeological Resources Report</u></p> <p>The archaeological consultant shall submit a Draft Final Archaeological Resources Report (FARR) to the ERO that evaluates the historical significance of any discovered archaeological resource and describes the archaeological and historical research methods employed in the archaeological testing/monitoring/data recovery program(s) undertaken. Information that may put at risk any archaeological resource shall be provided in a separate removable insert within the</p>	
<p><i>cont'd.</i></p>			

Summary
Table S.1 (Continued)

Impact	Level of Significance before Mitigation	Mitigation Measures	Level of Significance after Mitigation
<i>Legend:</i> NI = No Impact; LS = Less than Significant; S = Significant; SU = Significant and unavoidable adverse impact, no feasible mitigation; NA = Not Applicable			
<i>cont'd.</i>		<p>final report.</p> <p>Once approved by the ERO, copies of the FARR shall be distributed as follows: California Archaeological Site Survey Northwest Information Center (NWIC) shall receive one (1) copy and the ERO shall receive a copy of the transmittal of the FARR to the NWIC. The Environmental Planning division of the Planning Department shall receive one bound, one unbound and one unlocked, searchable PDF copy on CD of the FARR along with copies of any formal site recordation forms (CA DPR 523 series) and/or documentation for nomination to the National Register of Historic Places/California Register of Historical Resources. In instances of high public interest 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.</p>	
CP-3: Construction activities of the proposed project could affect unique geologic features or unique paleontological resources, if present within the project site.	S	<p>Mitigation Measure M-CP-3: Paleontological Resources Monitoring and Mitigation Program</p> <p>The project sponsor shall retain the services of a qualified paleontological consultant having expertise in California paleontology to design and implement a Paleontological Resources Monitoring and Mitigation Program. The PRMMP shall include a description of when and where construction monitoring would be required; emergency discovery procedures; sampling and data recovery procedures; procedure for the preparation, identification, analysis, and curation of fossil specimens and data recovered; preconstruction coordination procedures; and procedures for reporting the results of the monitoring program.</p> <p>The PRMMP shall be consistent with the Society for Vertebrate Paleontology Standard Guidelines for the mitigation of construction-related adverse impacts to paleontological resources and the requirements of the designated repository for any fossils collected. During construction, earth-moving activities shall be monitored by a qualified paleontological consultant having expertise in California paleontology in the areas where these activities have the potential to disturb previously undisturbed native sediment or sedimentary rocks. Monitoring need not be conducted in areas where the ground has been previously disturbed, in areas of artificial fill, in areas underlain by nonsedimentary rocks, or in areas where exposed sediment would be buried, but otherwise undisturbed.</p> <p>The consultant's work shall be conducted in accordance with this measure and at the direction of the City's ERO. Plans and reports prepared by the consultant 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. Paleontological monitoring and/or data recovery programs required by this measure could suspend construction of the proposed project for as short a</p>	LS
<i>cont'd.</i>			

Summary
Table S.1 (Continued)

Impact	Level of Significance before Mitigation	Mitigation Measures	Level of Significance after Mitigation
<i>Legend:</i> NI = No Impact; LS = Less than Significant; S = Significant; SU = Significant and unavoidable adverse impact, no feasible mitigation; NA = Not Applicable <i>cont'd.</i>			
		duration as reasonably possible and in no event for more than 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 potential effects on a significant paleontological resource as previously defined to a less-than-significant level.	
CP-4: The proposed project's construction activities could adversely affect human remains, if such remains are present within the project site.	S	Implement Mitigation Measure M-CP-2: Archaeological Testing, Monitoring, Data Recovery and Reporting , above.	LS
C-CP-1: The proposed project, in combination with past, present, and reasonably foreseeable future projects in the vicinity, would not result in a cumulatively considerable contribution to significant cumulative impacts on cultural resources.	S	Implement Mitigation Measure M-CP-2: Archaeological Testing, Monitoring, Data Recovery and Reporting and Mitigation Measure M-CP-3: Paleontological Resources Monitoring and Mitigation Program , above.	LS
Hazards and Hazardous Materials			
HZ-2: Construction of the proposed project would not create a significant hazard to the public or the environment through the release of hazardous materials.	S	Mitigation Measure M-HZ-2: Hazardous Building Materials Abatement The project sponsor shall ensure that any building or structure planned for demolition or renovation is surveyed for hazardous building materials. These materials shall be removed and properly disposed of prior to the start of demolition or renovation. Any other hazardous building materials identified either before or during demolition or renovation shall be abated according to Federal, State, and local laws and regulations.	LS

Table S.2: Summary of Improvement Measures Identified in the EIR

Impact	Improvement Measures
Transportation and Circulation	
<p>Impact TR-1: The proposed project or its variants would not cause a substantial increase in traffic that would cause the level of service to decline from LOS D or better to LOS E or F, or from LOS E to F, at the ten study intersections in the project vicinity. (<i>Less than Significant</i>)</p>	<p>Improvement Measure I-TR-A: Monitoring and Abatement of Queues and Conflicts</p> <p>As an improvement measure to reduce the potential for queuing of vehicles accessing the project site, it could be the responsibility of the project sponsor to ensure that recurring vehicle queues or vehicle conflicts (with left-turning vehicles including trucks on Post Street) do not occur on Post Street, Gough Street, or Geary Boulevard adjacent to the site. A vehicle queue is defined as one or more vehicles (destined to the parking garage or loading facility) blocking any portion of the Post Street, Gough Street, or Geary Boulevard sidewalk or travel lanes on Post Street, Gough Street, or Geary Boulevard for a consecutive period of three minutes or longer on a daily and/or weekly basis. A vehicle conflict to monitor would be left-turning vehicles leaving the project site and blocking any portion of the Post Street or Gough Street sidewalks or travel lanes such that the flow of traffic, in particular transit, pedestrian, and bicycle traffic is interrupted.</p> <p>If the Planning Director, or his or her designee, suspects that a recurring queue or conflicts is present, the Planning Department will notify the project sponsor in writing. Upon request, the owner/operator could hire a qualified transportation consultant to evaluate the conditions at the site for no less than seven days. The consultant could 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 could have 90 days from the date or the written determination to abate the recurring queue or conflict.</p> <p>Improvement Measure I-TR-B: Transportation Demand Management Plan</p> <p>As an improvement measure to reduce the unmet parking demand and encourage use of alternate modes, the project sponsor could develop and implement a Transportation Demand Management (“TDM”) Plan for each building that would be designed to reduce use of single-occupant vehicles and to increase the use of rideshare, transit, bicycle, and walk modes for trips to and from the proposed project. The TDM plan could include such measures as the following to reduce single occupancy vehicles and encourage alternate modes of travel:</p> <p>TDM Coordinator: The project sponsor should identify a TDM coordinator for the project site. The TDM Coordinator is responsible for the implementation and ongoing operation of all other TDM measures included in the proposed project. The TDM Coordinator could be a brokered service through an existing transportation management association (e.g., the Transportation Management Association of San Francisco, TMA SF), or the TDM Coordinator could be an existing staff member (e.g., property manager); the TDM Coordinator does not have to work full-time at the</p>

cont'd.

Impact	Improvement Measures
<p><i>cont'd.</i></p>	<p>project site. However, the TDM Coordinator should be the single point of contact for all transportation-related questions from building occupants and City staff. The TDM Coordinator should provide TDM training to other building staff about the transportation amenities and options available at the project site and nearby.</p> <p>Transportation and Trip Planning Information:</p> <p><i>Move-in packet:</i> Provide a transportation insert for the move-in packet that includes information on transit service (local and regional, schedules and fares), information on where transit passes could be purchased, information on the 511 Regional Rideshare Program and nearby bike and car share programs, and information on where to find additional web-based alternative transportation materials (e.g., NextMuni phone app). This move-in packet should be continuously updated as local transportation options change, and the packet should be provided to each new building occupant. Provide Muni maps, San Francisco Bicycle and Pedestrian maps upon request.</p> <p><i>New-hire packet:</i> Provide a transportation insert for the new-hire packet that includes information on transit service (local and regional, schedules and fares), information on where transit passes could be purchased, information on the 511 Regional Rideshare Program and nearby bike and car share programs, and information on where to find additional web-based alternative transportation materials (e.g., NextMuni phone app). This new hire packet should be continuously updated as local transportation options change, and the packet should be provided to each new building occupant. Provide Muni maps, San Francisco Bicycle and Pedestrian maps upon request.</p> <ul style="list-style-type: none"> • Data Collection: <i>City Access.</i> As part of an ongoing effort to quantify the efficacy of TDM measures, City staff may need to access the project site (including the garage) to perform trip counts, and/or intercept surveys and/or other types of data collection. All on-site activities should be coordinated through the TDM Coordinator. Project sponsor assures future access to the site by City Staff. Providing access to existing developments for data collection purposes is also encouraged. • Bicycle Measures: <i>Parking:</i> Increase the number of on-site secured bicycle parking beyond <i>Planning Code</i> requirements and/or provide additional bicycle facilities in public right-of-way locations adjacent to or within a quarter mile of the project site (e.g., sidewalks, on-street parking spaces). <p><i>cont'd.</i></p>

Summary
Table S.2 (Continued)

Impact	Improvement Measures
<i>cont'd.</i>	<p><i>Bay Area Bike Share:</i> Project sponsor should cooperate with the San Francisco Municipal Transportation Agency, San Francisco Department of Public Works, and/or Bay Area Bike Share (agencies) and allow installation of a bike share station in the public right-of-way along the project's frontage.</p> <p>As part of Improvement Measure I-TR-B, the project sponsor would work with the Planning Department to determine a procedure for annual reporting of when and how measures within the TDM plan were implemented.</p>
Impact TR-2: The proposed project or its variants would not result in a substantial increase in transit demand that could not be accommodated by adjacent local and regional transit capacity, nor would it cause a substantial increase in delays or operating costs such that significant adverse impacts to local or regional transit service could occur. (<i>Less than Significant</i>)	<p>Improvement Measure I-TR-G: Coordination of Move-In/Move-Out Activities and Large Deliveries, shown below.</p> <p>Improvement Measures I-TR-H: PM Peak Period Off-Street Loading Access Restrictions, shown below.</p>
Impact TR-3: The proposed project or its variants would not result in a substantial overcrowding on public sidewalks, nor create potentially hazardous conditions for pedestrians, or otherwise interfere with pedestrian accessibility on the site and adjoining areas. (<i>Less than Significant</i>)	<p>Improvement Measure I-TR-C: Fund the Design and Implementation of Upgraded Crosswalks at Two Intersections in Project Vicinity</p> <p>Crosswalks could be restriped to the Continental design at the intersections of Gough/Post streets and Laguna/Post streets, consistent with the <i>Better Streets Plan</i>. The project sponsor could contribute to the San Francisco Municipal Transportation Agency a fair share of the costs associated with the design and implementation of upgrading all crosswalks at the intersections of Gough/Post streets and Laguna/Post streets.</p>
	<p>Improvement Measure I-TR-D: Fund the Design and Implementation of Pedestrian Countdown Signals at Two Intersections in Project Vicinity</p> <p>Pedestrian countdown signals could be added to the traffic signals at the intersections of Gough/Post streets and Laguna/Post streets, consistent with the <i>Better Streets Plan</i>. The project sponsor could contribute to the San Francisco Municipal Transportation Agency a fair share of the costs associated with the design and implementation of pedestrian signal heads in all directions at the intersections of Gough/Post streets and Laguna/Post streets.</p>
<i>cont'd.</i>	<p>Improvement Measure I-TR-E: Contribute to the Cost of Design and Implementation of Pedestrian-Actuated Flashing Beacons at the Existing Midblock Crosswalk on Post Street between Laguna and Gough Streets</p> <p>The project sponsor could contribute to the San Francisco Municipal Transportation Agency a fair share of the cost of design and installation of pedestrian flashing beacons at the existing midblock crosswalk on Post Street between Laguna and Gough streets (at the western edge of the property at the</p>

Summary
Table S.2 (Continued)

Impact	Improvement Measures
<i>cont'd.</i>	former location of Octavia Street). The project sponsor contribution could be based on the number of project vehicle trips as a percentage of Existing plus Project traffic volumes at this location (i.e., 58 weekday PM peak hour project-generated vehicles over Existing plus Project traffic volumes [510 total vehicles] results in a project contribution of about 11 percent of the cost of design and installation of the flashing beacons).
Impact TR-4: The proposed project or its variants would not result in potentially hazardous conditions for bicyclists, or otherwise substantially interfere with bicycle accessibility to the site and adjoining areas. (<i>Less than Significant</i>)	Improvement Measure I-TR-F: Additional Bicycle Parking for the 1333 Gough Street Building Although not required under the Planning Code for the existing 1333 Gough Street building, the project sponsor could consider increasing the amount of Class 1 and/or Class 2 bicycle parking spaces available for use by the existing 1333 Gough Street residents and visitors.
Impact TR-5: The loading demand for the proposed project or its variants would be accommodated within the proposed on-site loading facilities, and would not create potentially hazardous conditions or significant delays for traffic, transit, bicyclists or pedestrians. (<i>Less than Significant</i>)	Improvement Measure I-TR-A: Monitoring and Abatement of Queues and Conflicts , shown above
	Improvement Measure I-TR-G: Coordination of Move-In/Move-Out Activities and Large Deliveries As an improvement measure to reduce the potential for conflicts between large delivery vehicles and Muni bus operations on Post Street and Geary Boulevard, residential move-in and move-out activities and large deliveries could be scheduled and coordinated through building management. Building management could ensure that the gate on Geary Boulevard into the service area is opened by staff from the building prior to delivery trucks utilizing the service area arriving at the project site.
	Improvement Measure I-TR-H: PM Peak Period Off-Street Loading Access Restrictions Delivery trucks could be restricted from accessing the off-street loading facility via Geary Boulevard during the 4 to 7 PM peak period on weekdays. Trucks could be permitted to depart the off-street loading facility via Post Street at any time.
Impact TR-7: The proposed project or its variants would not result in construction-related transportation impacts because of their temporary and limited duration. (<i>Less than Significant</i>) <i>cont'd.</i>	Improvement Measure I-TR-I: Construction Measures Traffic Control Plan for Construction – As an improvement measure to reduce potential conflicts between construction activities and pedestrians, transit and vehicles at the project site, the contractor could prepare a traffic control plan for the project construction period. The project sponsor and construction contractor(s) would meet with DPW, SFMTA, the Fire Department, Muni Operations and other City agencies to coordinate feasible measures to reduce traffic congestion, including temporary transit stop relocations (not anticipated, but if determined necessary) and other measures to reduce

Summary
Table S.2 (Continued)

Impact	Improvement Measures
<p><i>cont'd.</i></p>	<p>potential traffic and transit disruption and pedestrian circulation effects during construction of the proposed project. This review would consider other ongoing construction in the project area, such as construction of the planned CPMC Cathedral Hill medical campus. The contractor would be required to comply with the <i>City of San Francisco's Regulations for Working in San Francisco Streets</i>, which establish rules and permit requirements so that construction activities can be done safely and with the lowest level of possible conflicts with pedestrians, bicyclists, transit and vehicular traffic. As part of this effort, alternate construction staging locations could be identified and assessed.</p> <p><u>Carpool and Transit Access for Construction Workers</u> – As an improvement measure to minimize parking demand and vehicle trips associated with construction workers, the construction contractor could include methods to encourage carpooling and transit access to the project site by construction workers in the Construction Management Plan.</p> <p><u>Project Construction Updates for Adjacent Businesses and Residents</u> – As an improvement measure to minimize construction impacts on access to nearby institutions and businesses, the project sponsor could provide existing residential tenants, 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, parking lane and sidewalk closures. Existing tenants of 1333 Gough Street could be notified of arrangements for alternate parking access and facilities during the construction period, and building management would be available to address questions related to circulation, pedestrian or vehicular access, parking and construction activities. The construction contractor could create a web site for the proposed project that would provide current construction information of interest to neighbors, as well as contact information for specific construction inquiries or concerns. In addition, the project sponsor could maintain a log of neighborhood and resident complaints received related to construction activities, with the date/time/complainant name and contact information, as well as the response/resolution of the complaint. This log would be provided to the Planning Department and/or the Building Department upon request.</p>
<p>Impact C-TR-2: The proposed project or its variants in combination with past, present and reasonably foreseeable development would not contribute to significant cumulative transit impacts on local or regional transit capacity. (<i>Less than Significant</i>)</p>	<p>Improvement Measure I-TR-A: Monitoring and Abatement of Queues and Conflicts, shown above.</p> <p>Improvement Measure I-TR-G: Coordination of Move-In/Move-Out Activities and Large Deliveries, shown above.</p> <p>Improvement Measure I-TR-H: PM Peak Period Off-Street Loading Access Restrictions, shown above.</p>

Summary
Table S.2 (Continued)

Impact	Improvement Measures
Impact C-TR-7: The proposed project or its variants in combination with past, present and reasonably foreseeable future development in the project vicinity would not contribute considerably to any significant cumulative construction-related transportation impacts. (<i>Less than Significant</i>)	Improvement Measure I-TR-1: Construction Measures , shown above.
Wind and Shadow	
Impact WS-1: The proposed project would not alter wind in a manner that substantially affects public areas. (<i>Less than Significant</i>)	Improvement Measure I-WS-A: Wind Reduction Measures As an improvement measure to reduce ground-level wind speeds in areas of substantial pedestrian activity and/or areas that are used for public seating, the project sponsor should strive to install, or cause to be installed, wind reduction measures that could include hedges, planter boxes, trees, trellises, and/or windscreens on the project site.
Impact C-WS-1: The proposed project in combination with past, present, and reasonably foreseeable future projects in the project vicinity would not make a cumulatively considerable contribution to a significant cumulative wind impact. (<i>Less than Significant</i>)	Improvement Measure I-WS-A: Wind Reduction Measures , shown above.

S.3. SUMMARY OF SIGNIFICANT IMPACTS

As described above in **Table S.1**, this EIR identifies no significant and unavoidable impacts resulting from the proposed project. Significant project-level impacts related to construction noise (NO-1) and construction emissions (AQ-1) are identified with mitigation measures that would reduce those impacts to less-than-significant levels. As described in **Table S.1**, the Initial Study identifies five significant impacts before mitigation (archeological resources; paleontological resources; human remains; cumulative archeological and paleontological resources; hazardous materials) and identifies mitigation measures that would reduce those impacts to less-than-significant levels.

S.4. SUMMARY OF PROJECT ALTERNATIVES

Four alternatives are evaluated in this EIR: the No Project Alternative; the Code-Compliant Alternative; the Reduced Height Alternative; and the Reduced Tower Footprint and Height Alternative. The four alternatives are described in detail in **Chapter 6, Alternatives. Table S.3: Comparison of the Proposed Project to Alternatives**, on pp. S.37-S.39, shows a comparison of the features of the proposed project against each of the alternatives.

ALTERNATIVE A: NO PROJECT ALTERNATIVE

CEQA Guidelines Section 15126.6(e) requires that, among the project alternatives, a “no project” alternative be evaluated. “The purpose of describing and analyzing a no project alternative is to allow decisionmakers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project.” *CEQA Guidelines* Section 15126.6(e)(2) requires that the no project alternative analysis “discuss the existing conditions...as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and policies and consistent with the available infrastructure and community services.”

Under Alternative A, No Project, the existing conditions at the project site would not change. The existing residential building on the project site at 1333 Gough Street (169 units, 14 stories, about 138 feet tall, and 214,400 gsf), parking garage structure (163 spaces, 65,100 gsf), 2 surface parking lots (13 spaces), and fitness center (4,700 gsf, 2 outdoor tennis courts atop the parking structure) would be maintained in their current condition.

The proposed residential building, café, and subsurface parking garage would not be constructed. The existing fitness center and lobby at the ground floor of 1333 Gough Street would not be renovated, the proposed indoor swimming pool addition would not be constructed, and the proposed pedestrian walkway at the western end of the project site would not be constructed. The

project site would not be rezoned and the existing 240-E Height and Bulk District would remain.

Assuming that the existing physical conditions at the project site were to continue for the foreseeable future, none of the impacts associated with the proposed project would occur.

ALTERNATIVE B: CODE-COMPLIANT ALTERNATIVE

The Alternative B: Code-Compliant Alternative provides an alternative that meets all applicable provisions of the Planning Code. Under this alternative, the project would not exceed the existing 240-E Height and Bulk District. The portion of the existing parking garage to the west of the 1333 Gough Street building and the common open space terrace, tennis courts and pool building would be demolished and a new 25-story, approximately 240-foot-tall tower (plus an additional 16-foot-tall elevator/mechanical penthouse) would be constructed to the west of 1333 Gough Street on the project site (see **Figure 6.1: Code-Compliant Alternative - Site Plan and Geary Boulevard Perspective Rendering**, p. 6.10). The new 1481 Post Street building under the Code-Compliant Alternative would contain 225 units (37 fewer units than under the proposed project). No café use would be included under this alternative. The existing 1333 Gough Street building would continue to include 169 residential units. No renovation of the 1333 Gough Street fitness center, or construction of a pool addition, would occur. The existing fitness center would continue to operate, but the facility would no longer include the two existing tennis courts (the existing swimming pool building was permanently closed in 2010). As with the proposed project, this alternative could incorporate the sidewalk widening and vehicular access components of each of the project variants.

Under this alternative, the portions of the existing parking structure directly to the north and south of the 1333 Gough Street building (64 spaces) and the existing 13 surface parking spaces at the northeast and southeast corners of the project site would be retained and reused (two 1333 Gough Street resident spaces, seven 1333 Gough Street visitor spaces, and four carshare spaces). The portion of the existing above-ground parking structure on the western portion of the project site, along with the tennis courts and pool building on its roof, would be demolished and a new 5-level, 328-space, subsurface parking garage would be constructed. The subsurface parking garage would include 225 spaces for residents of the new 1481 Post Street building and 103 spaces as replacement parking for the existing 1333 Gough Street resident parking spaces on the western portion of the project site that would be demolished under this alternative. However, all parking spaces for residents and visitors of 1333 Gough Street would be temporarily unavailable for about 12 months until the new subsurface parking garage could be occupied.

Site access for residents of the new 1481 Post Street building under this alternative would be similar to that of the proposed project. Passenger vehicles would enter the western portion of the project site from Post Street near the northwest corner of the project site and proceed to a

passenger drop-off at the lobby entrance. Vehicles could proceed to a two-way ramp to the parking garage below. Vehicles would exit the site to Post Street through a curb cut east of the entrance curb cut.

Site access for residents of the existing 1333 Gough Street building would be the same as under existing conditions. The lobby entrance and passenger drop-off would be along Gough Street at its existing location. Existing curb cuts at the northeast and southeast corners of the project site along Gough Street and Geary Boulevard would remain in place. However, the replacement parking spaces for residents of 1333 Gough Street that would be accommodated in the new subsurface parking garage would be accessed as described above for residents of the new 1481 Post Street Building.

Loading for the new 1481 Post Street building and the existing 1333 Gough Street building would be similar to that of the proposed project. Delivery vehicles for both the new 1481 Post Street building under this alternative and the existing 1333 Gough Street building would access the project site from a curb cut entrance along Geary Boulevard and exit the project site onto Post Street.

The Code-Compliant Alternative would require the following discretionary project approvals: Determination by the Planning Commission and Recreation and Park Commission under Planning Code Section 295 that new shadow being cast on Peace Plaza would not be adverse to the use of the park; Conditional Use authorization from the Planning Commission to construct a building exceeding a height of 50 feet in an RM-4 District; and approval by the Planning Commission of a Planned Unit Development (including amendments to the existing 1963 PUD as necessary). Unlike the proposed project, no *General Plan* amendment or Planning Code amendment would be necessary to reclassify the existing 240-E height and bulk district and no exceptions to provisions of the Planning Code governing rear yard depth (Planning Code Section 134), dwelling unit exposure (Planning Code Section 140) would be necessary.

Unlike the proposed project, the Code-Compliant Alternative would not conflict with land use plans and policies related to building height and bulk. However, like the proposed project, the Code-Compliant Alternative would result in less-than-significant project-level and cumulative land use and land use planning impacts. As with the proposed project, the Code-Compliant Alternative would result in less-than-significant impacts related to transportation and wind and shadow (before mitigation), and less-than-significant impacts related to noise and air quality (with mitigation measures).

ALTERNATIVE C: REDUCED HEIGHT ALTERNATIVE

Alternative C: Reduced Height Alternative provides an alternative with the same number of residential units as the proposed project (262 units) in a 240-foot-tall, 25-story building. (See **Figure 6.2: Reduced Height Alternative - Site Plan and Geary Boulevard Perspective Rendering**, p. 6.26.) As with Alternative B: Code-Compliant Alternative, under this alternative, the western portion of the existing 1333 Gough Street parking garage (and the existing two tennis courts and vacant pool building that sit atop this portion of the parking garage) would be demolished. A new residential building would be constructed in the western portion of the project site. As with the proposed project, this alternative could incorporate the sidewalk widening and vehicular access components of each of the project variants.

The building would conform to the height limitations of the 240-E Height and Bulk District. However, the new building under this alternative would not conform to bulk controls in the “E” district, which become effective above a building height of 65 feet. These controls limit plan dimensions to a maximum horizontal dimension of 110 feet and a maximum diagonal measurement of 140 feet.

The new building under this alternative would have a 13-story podium base that would be set back 15 feet from Post Street, 51 feet from the existing 1333 Gough Street building on the eastern portion of the project site, and 10 feet from the west property line of the project site shared with The Sequoias. Above the 13th floor to the 25th floor, the tower shaft element would rise from the podium to a height of 240 feet. The tower element would be roughly square in plan, measuring 110 feet north-to-south and east-to-west. Diagonally, the tower element of this alternative would measure 139 feet, 8 inches.

The new 1481 Post Street building under the Reduced Height Alternative would contain 262 units, the same number as the proposed project. No café use would be included under this alternative. The existing 1333 Gough Street building would continue to include 169 residential units. No renovation of the 1333 Gough Street fitness center, or construction of a pool addition, would occur. The existing fitness center would continue to operate, but the facility would no longer include the two existing tennis courts.

Under this alternative, the portions of the existing parking structure directly to the north and south of the 1333 Gough Street building (64 spaces) and the existing 13 surface parking spaces at the northeast and southeast corners of the project site would be retained and reused (for two 1333 Gough Street resident spaces, seven 1333 Gough Street visitor spaces, and four carshare spaces).

The portion of the existing above-ground parking structure on the western portion of the project site, along with the tennis courts and pool building on its roof, would be demolished and a new

5-level, 365-space, subsurface parking garage would be constructed for residents of the new 1481 Post Street building under this alternative (262 spaces) and as replacement parking for the existing 1333 Gough Street resident parking spaces on the western portion of the project site that would be demolished under this alternative (103 spaces). However, all parking spaces for residents and visitors of 1333 Gough Street would be temporarily unavailable for about 12 months until the new subsurface parking garage could be occupied.

Site access for residents of the new 1481 Post Street building under this alternative would be similar to that of the proposed project. Passenger vehicles would enter the western portion of the project site from Post Street near the northwest corner of the project site and proceed to a passenger drop-off at the lobby entrance. Vehicles could proceed to a two-way ramp to the parking garage below. Vehicles would exit the site to Post Street through a curb cut east of the entrance curb cut.

Site access for residents of the existing 1333 Gough Street building would be the same as under existing conditions. The lobby entrance and passenger drop-off would be along Gough Street at its existing location. Existing curb cuts at the northeast and southeast corners of the project site along Gough Street and Geary Boulevard would remain in place. However, the replacement parking spaces for residents of 1333 Gough Street that would be accommodated in the new subsurface parking garage would be accessed as described above for residents of the new 1481 Post Street Building.

Loading for the new 1481 Post Street building and the existing 1333 Gough Street building would be similar to that of the proposed project. Delivery vehicles for both the new 1481 Post Street building under this alternative and the existing 1333 Gough Street building would access the project site from a curb cut entrance along Geary Boulevard and exit the project site onto Post Street.

Like the proposed project, under the Reduced Height Alternative, the following discretionary project approvals would be required: General Plan amendment and Planning Code amendment to reclassify the existing "E" Bulk District to allow a diagonal plan measurement to exceed 140 feet above a height of 65 feet. This alternative would also require a determination by the Planning Commission and Recreation and Park Commission under Planning Code Section 295 that new shadow being cast on Peace Plaza would not be adverse to the use of the park; Conditional Use authorization from the Planning Commission to construct a building exceeding a height of 50 feet in an RM-4 District; and approval by the Planning Commission of a Planned Unit Development (including amendments to the existing 1963 PUD as necessary) to allow exceptions to provisions of the Planning Code governing rear yard depth (Planning Code Section 134). Unlike the proposed project, no *General Plan* amendment or Planning Code amendment would be required to exceed the existing 240-foot height limit.

Unlike the proposed project, the Reduced Height Alternative would not conflict with the existing height limit for the project site. Like the proposed project, it would conflict with the existing bulk limit. However, as with the proposed project, this alternative would result in less-than-significant project-level and cumulative land use and land use planning impacts. As with the proposed project, the Reduced Height Alternative would result in less-than-significant impacts related to transportation and wind and shadow (before mitigation), and less-than-significant impacts related to noise and air quality (with mitigation measures).

ALTERNATIVE D: REDUCED TOWER FOOTPRINT AND HEIGHT ALTERNATIVE

Alternative D: Reduced Tower Footprint and Height Alternative provides a development alternative that meets applicable height and bulk provisions of the Planning Code and provides for greater distance between the new tower on the project site and the neighboring property to the west, The Sequoias. The 24-story tower under this alternative would be 240 feet tall (256 feet tall with a 16-foot-tall mechanical penthouse), and contain 161 units on the western portion of the project site. This alternative would also include a total of 26 3-story, single-family townhomes along the Post Street and Geary Boulevard frontages of the project site (totaling 187 units). (See **Figure 6.3: Reduced Tower Footprint and Height Alternative - Site Plan and Geary Boulevard Perspective Rendering**, p. 6.43.) As with the proposed project, under this alternative, the existing 1333 Gough Street parking garage (and the existing two tennis courts and vacant pool building that sit atop this portion of the parking garage) would be demolished. As with the proposed project, this alternative could incorporate the sidewalk widening components of each of the project variants; however, the site plan under this alternative would preclude implementation of the vehicular access components under the project variants.

The existing 1333 Gough Street building would continue to include 169 residential units. No renovation of the 1333 Gough Street fitness center, or construction of a pool addition, would occur. The existing fitness center would continue to operate but the facility would no longer include the two existing tennis courts (the existing swimming pool building was permanently closed in 2010).

As with the proposed project, under this alternative the existing parking structure to the north, west, and south of the existing 1333 Gough Street building would be demolished and a new subsurface garage would be constructed in its place up to the perimeter property line. The garage would provide a total of 367 parking spaces in three levels (compared to 442 parking spaces in four levels under the proposed project) and would function in a similar fashion as the proposed project garage, described in **Chapter 2, Project Description**. Temporary parking during construction would be provided in a similar fashion as that for the proposed project.

Under this alternative, vehicles would enter the 1481 Post Street portion of the project site through a single, two-way, curb cut entrance/exit along Post Street. Vehicles could proceed to the passenger drop-off at the lobby entrance under this alternative and proceed southward to exit the site from a single, two-way, 20-foot-wide curb cut entrance/exit, turning right (westbound) onto Geary Boulevard. Vehicles entering from Post Street could also proceed down a ramp to the subsurface garage. Vehicles exiting the 1481 Post Street portion of the garage would exit the site onto Post Street. Vehicles entering the site from Geary Boulevard westbound would proceed northward through the site to the passenger drop-off and would exit onto Post Street turning right (eastbound) or left (westbound).

Under this alternative, vehicles would enter the 1333 Gough Street portion of the project site through a single, two-way, 20-foot-wide curb cut entrance/exit along Gough Street by turning right from Gough Street. Vehicles would proceed to the passenger drop-off at the lobby entrance to the existing 1333 Gough Street building (which would be relocated to the north side of the building under this alternative) and would turn around to exit the site onto Gough Street by turning right. As with the proposed project, vehicles would also proceed down the ramp to the subsurface parking garage with spaces for guests, car-share spaces, and spaces for 1333 Gough residents.

Like the proposed project, under the Reduced Tower Footprint and Height Alternative, the following discretionary project approvals would be required: determination by the Planning Commission and Recreation and Park Commission under Planning Code Section 295 that new shadow being cast on Peace Plaza would not be adverse to the use of the park; Conditional Use authorization from the Planning Commission to construct a building exceeding a height of 50 feet in an RM-4 District; and approval by the Planning Commission of a Planned Unit Development (including amendments to the existing 1963 PUD as necessary) to allow exceptions to provisions of the Planning Code governing rear yard depth (Planning Code Section 134). Unlike the proposed project, no *General Plan* amendment or Planning Code amendment to reclassify the existing 240-E Height and Bulk District and no exceptions to provisions of the Planning Code governing residential density (Planning Code Section 209.1(1)) would be necessary under this alternative.

Unlike the proposed project, the Reduced Tower Footprint and Height Alternative would not conflict with land use plans and policies related to building height and bulk. However, like the proposed project, the Reduced Tower Footprint and Height Alternative would result in less-than-significant project-level and cumulative land use and land use planning impacts. As with the proposed project, the Reduced Tower Footprint and Height Alternative would result in less-than-significant impacts related to transportation and wind and shadow (before mitigation), and less-than-significant impacts related to noise and air quality (with mitigation measures).

Table S.3: Comparison of the Proposed Project to Alternatives

Description	Proposed Project (New Construction)	Alternative A No Project (Existing Conditions)	Alternative B Code-Compliant (New Construction)	Alternative C Reduced Height (New Construction)	Alternative D Reduced Tower Footprint and Height (New Construction)
Building Height (a)	398 ft.	138 ft.	240 ft.	240 ft.	240 ft.
Stories	36	14	25	25	24
Minimum Tower Setbacks (Lower Portion / Upper Portion)					
from Post Street	20 ft. / 40 ft.	Not Applicable	15 ft. / 26 ft.	15 ft. / 26 ft.	43 ft. / 43 ft. (b)
from Geary Blvd.	10 ft. / 46 ft.	Not Applicable	49 ft. / 60 ft.	0 ft. / 60 ft.	43 ft. / 43 ft. (b)
from West Property Line	10 ft. / 12 ft.	Not Applicable	0 ft. / 5 ft.	10 ft. / 10 ft.	40 ft. / 40 ft. (b)
from 1333 Gough St. Bldg.	0 ft. / 41 ft.	Not Applicable	5 ft. / 56 ft.	51 ft. / 51 ft.	46 ft. / 46 ft. (b)
Residential Units					
1 Bedroom/Studio	136	104	142	164	115
2 Bedroom	86	65	61	75	46
3 Bedroom	36	0	22	23	26
4 Bedroom	4	0	0	0	0
Total Units	262 units	169 units	225 units	262 units	187 units
GSF by Use					
Residential	437,500 gsf	214,400 gsf	355,320 gsf	401,600 gsf	320,380 gsf (c)
Café	2,230 gsf	None	None	None	None
Parking	180,000 gsf	65,100 gsf	147,240 gsf	163,600 gsf	147,500 gsf
Fitness Center	8,000 gsf	4,700	None	None	None
Total GSF	627,730 gsf	284,200 gsf	502,560 gsf	565,200 gsf	467,880 gsf

Table S.3: Comparison of the Proposed Project to Alternatives (continued)

	Proposed Project (New Construction)	Alternative A No Project (Existing Conditions)	Alternative B Code-Compliant (New Construction)	Alternative C Reduced Height (New Construction)	Alternative D Reduced Tower Footprint and Height (New Construction)
Parking, Bike, Loading					
Residential Spaces	431	169	394	431	356
Visitor Spaces	7	7	7	7	7
Car-share Spaces	4	None	4	4	4
Total Spaces	442 (d)	176	405 (e)	442 (f)	367(g)
Bicycle Parking Spaces (Class 1)	293	None	225	262	187
Bicycle Parking Spaces (Class 2)	18	None	11	13	9
Off Street Loading Spaces	2	None	2	2	2

Notes:

- (a) For the purposes of comparison of these alternatives, building heights presented in this row are measured under Planning Code Section 260 and do not include mechanical penthouses and other exempted rooftop features.
- (b) The 24-story building under Alternative D does not include a podium feature. Under this alternative, 3-story townhouses would line Post Street and Geary Boulevard. The townhouses would each be set back from Post Street and Geary Boulevard by about 5 feet along their street frontages.
- (c) Under the Reduced Height and Tower Footprint Alternative, a 161-unit, 263,050-gsf residential tower would be constructed on the western portion of the project site and 26 townhouse structures, totaling about 57,330 gsf, would be constructed along the Post Street and Geary Boulevard frontages of the project site.
- (d) Under the proposed project, existing parking spaces within the existing parking garage structure at 1333 Gough Street would be demolished and replaced in a new 4-level, 442-space subsurface parking structure.
- (e) Under the Code-Compliant Alternative, a total of 405 parking spaces would be provided for existing residents of 1333 Gough and residents of the new building under this alternative in a combination of retained parking structures, retained surface parking, and a new subsurface parking garage construction. The portions of the existing parking structure directly to the north and south of the 1333 Gough Street building (64 spaces) and the existing 13 surface parking lots at the northeast and southeast corners of the project site would be retained and reused (for two 1333 Gough Street resident spaces, seven 1333 Gough Street visitor spaces, and four carshare spaces). The portion of the existing above-ground parking structure on the western portion of the project site, along with the tennis courts and pool building on its roof, would be demolished and a new 5-level, 328-space, subsurface parking garage would be constructed for residents of the new 1481 Post Street building under this alternative (225 spaces) and as

Notes, continued

Table S.3: Comparison of the Proposed Project to Alternatives (continued)

<i>Notes, continued</i>
<p>replacement parking for the existing 1333 Gough Street resident parking spaces on the western portion of the project site that would be demolished under this alternative (103 spaces).</p> <p>(f) Under the Reduced Height Alternative, a total of 442 parking spaces would be provided for existing residents of 1333 Gough and residents of the new building under this alternative in a combination of retained parking structures, retained surface parking, and a new subsurface parking garage. The portions of the existing parking structure directly to the north and south of the 1333 Gough Street building (64 spaces) and the existing 13 surface parking spaces at the northeast and southeast corners of the project site would be retained and reused (for two 1333 Gough Street resident spaces, seven 1333 Gough Street visitor spaces, and four carshare spaces). The portion of the existing above-ground parking structure on the western portion of the project site, along with the tennis courts and pool building on its roof, would be demolished and a new 5-level, 365-space, subsurface parking garage would be constructed for residents of the new 1481 Post Street building under this alternative (262 spaces) and as replacement parking for the existing 1333 Gough Street resident parking spaces on the western portion of the project site that would be demolished under this alternative (103 spaces).</p> <p>(g) Under the Reduced Tower Footprint and Height Alternative, existing parking spaces within the existing parking garage structure at 1333 Gough Street would be demolished and replaced in a new 3-level, 367-space subsurface parking structure.</p> <p><i>Source:</i> Turnstone Consulting</p>

ENVIRONMENTALLY SUPERIOR ALTERNATIVE

This EIR identifies no significant and unavoidable impacts of the proposed project. However, for the purpose of informed decision-making, this discussion identifies the alternative that would result, overall, in the greatest reduction of impacts from those of the proposed project (other than the No Project Alternative). On balance, the Reduced Tower Footprint and Height Alternative would result in the greatest overall reduction of less-than-significant impacts identified for the proposed project. It would include the fewest number of dwelling units of all of the alternatives. Above-ground new construction and construction activities would be located at the greatest distance from the neighboring Sequoias property. It would result in reduced less-than-significant impacts related to transportation and circulation, and would also result in reduced significant (less-than-significant after mitigation) impacts related to noise and air quality. With a reduced footprint and lower height, this alternative would result in less annual net new shadow on Recreation and Park properties.

S.5 AREAS OF KNOWN CONTROVERSY AND ISSUES TO BE RESOLVED

The project sponsor submitted an Environmental Evaluation Application for the 1333 Gough/1481 Post Street project on July 15, 2005. The project sponsor revised the application on May 23, 2012 to reflect changes to the proposed project's program and design. The Planning Department prepared an Initial Study and published a Notice of Preparation of an EIR on June 12, 2013, announcing its intent to prepare and distribute a focused EIR (the NOP/IS is presented as **Appendix A** to this EIR). Publication of the NOP/IS initiated a 30-day public review and comment period that began on June 12, 2013, and ended on July 12, 2013. Individuals and agencies that received these notices included owners of properties within 300 feet of the project site, occupants of the project site and adjacent properties, and potentially interested parties, including regional and state agencies. During the public review and comment period, approximately 75 comment letters were submitted to the Planning Department by interested parties. The comment letters on the NOP/IS raised the issues listed below.

On the basis of public comments on the NOP/IS, potential areas of controversy for the proposed project include the following (the boldface text below refers to the section of EIR and NOP/IS documents where the specific issue is addressed):

- **Project Description:** The duration of project construction period and its impact on nearby residents, especially senior citizens, and disclosure of renovations to the 1333 Gough Street Building.
- **Plans and Policies:** The proposed zoning amendment to reclassify the existing 240-E height and bulk limit for the project site to a 410-G height and bulk limit; the proposed amendment to the existing Planned Unit Development (PUD) to allow exceptions to

applicable provisions of the Planning Code governing rear yard depth and dwelling unit exposure; the ongoing planning effort for the area under the Japantown Cultural Heritage and Economic Sustainability Strategy; and consistency with the City's "Transit First" policy.

- **Land Use and Land Use Planning:** Potential effects resulting in a physical division of an established community; conflicts with Land Use Plans and Policies; impacts on existing land use character; the proximity of the proposed 1481 Post Street building to the neighboring Sequoias complex; and intensification of the residential dwelling unit density.
- **Population and Housing:** Potential need to relocate patients at The Sequoias health center facility due to construction of the proposed project and need for on-site affordable housing.
- **Transportation and Circulation:** Potential impacts on existing traffic conditions in the area; concerns related to existing pedestrian safety issues at nearby intersections and midblock pedestrian crossings; potential hazards resulting from conflicts between vehicles and pedestrians at the proposed curb cut entrances/exits to and from the project site, particularly for seniors; emergency access to the neighboring Sequoias complex during project construction; the supply of parking in the area during project construction and operation; cumulative impacts on traffic operations and transit capacity during construction and operation especially in combination with the approved California Pacific Medical Center (CPMC) Cathedral Hill medical campus; cumulative pedestrian safety issues under the proposed project combined with those of the approved CPMC Cathedral Hill medical campus.
- **Noise:** Potential impact of project construction noise and vibration on neighboring properties, particularly for senior residents of the retirement communities in the area and on The Sequoias health center facility near the west property line of the project site.
- **Air Quality:** Potential impacts of project construction related to air quality, particularly for senior residents of the retirement communities in the area and on The Sequoias health center facility near the west property line of the project site.
- **Greenhouse Gas Emissions:** Project contributions to greenhouse gas emissions.
- **Wind:** Potential wind impacts on public areas and on private property.
- **Shadow:** Potential shadow impacts on nearby streets and public open spaces and on nearby private property.
- **Geology and Soils:** Effects of project excavation and construction on the stability of the adjacent Sequoias property; adequacy of the *Preliminary Geotechnical Evaluation* in light of the updated 2013 California Building Code.
- **Hazards and Hazardous Materials:** Concern for the potential release of hazardous material during construction of the proposed project.
- **Other CEQA Considerations:** Concerns that the proposed increase in the height and bulk limits of the project site could encourage re-zoning of other sites in the area.
- **Alternatives:** Adequacy of the NOP/IS description of the alternatives to be analyzed in the EIR; consideration of an alternative in which all passenger and delivery vehicles

would enter from, and exit to, Geary Boulevard; consideration of an alternative that would increase the distance between the project tower and the neighboring Sequoias complex; consideration of an alternate project site; and consideration of a code conforming alternative.

An additional area of controversy may emerge regarding the provisions of SB 743 as they relate to the proposed project and this EIR. SB 743, which amended the Public Resources Code to add § 21099, was signed by Governor Brown on September 27, 2013. This was subsequent to the publication of the NOP/IS, which had indicated that this EIR would include a discussion of aesthetics-related impacts of the proposed project. § 21099(d) directs that the aesthetic and parking impacts of mixed-use residential 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 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 for informational purposes as part of **Chapter 2, Project Description**. Similarly, this EIR discusses parking for informational purposes in **Section 4.C, Transportation and Circulation**. (See pp. 4.A.1-4.A.3 for further discussion of SB 743 and Public Resources Code § 21099.)

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

1. INTRODUCTION

A. PROJECT SUMMARY

The project sponsor, The ADCO Group, proposes demolition of the existing parking structure for 1333 Gough Street (together with the common open space terrace, and the existing fitness center's tennis courts and vacant pool building atop the parking structure) and construction of a new 262-unit, 36-story, 398-foot-tall (416 feet tall including an 18-foot-tall mechanical penthouse), 437,500-gross-square-foot (gsf) residential building (the proposed 1481 Post Street building) west of 1333 Gough Street on the project site. The new building would include a 2,230-gsf café along Post Street at the northwest corner of the project site. Along the west property line on the project site, the proposed project would include a 10-foot-wide, publicly accessible walkway that would facilitate midblock pedestrian passage between Post Street and Geary Boulevard. The proposed project also includes construction of a subsurface parking garage (442 spaces total, about 180,000 gsf) to serve the residents of the new 1481 Post Street building (262 spaces), the existing 1333 Gough Street building (176 replacement spaces), and 4 carshare spaces. In addition, the proposed project entails renovation of the existing fitness center at the ground floor of 1333 Gough Street and construction of a new indoor swimming pool addition (about 8,000 gsf) fronting Geary Boulevard.

B. PURPOSE OF THIS ENVIRONMENTAL IMPACT REPORT

This Environmental Impact Report (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 § 21000 et seq., and California Code of Regulations Title 14, § 15000 et seq., “*CEQA Guidelines*”), and Chapter 31 of the San Francisco Administrative Code. The lead agency is the public agency that has the principal responsibility for carrying out or approving a project.

Pursuant to *CEQA Guidelines* § 15161, this is a project-level EIR, defined as an EIR that examines the physical environmental impacts of a specific development project. This EIR assesses potentially significant impacts in the areas of land use and land use planning, transportation and circulation, noise, air quality, wind, and shadow. As defined in *CEQA Guidelines* § 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.

On September 27, 2013, Governor Brown signed Senate Bill (SB) 743, which became effective on January 1, 2014. Among other things, SB 743 added § 21099 to the Public Resources Code and no longer requires the analysis of aesthetics and parking impacts for certain urban infill projects under CEQA. The proposed project meets the definition of a mixed-use residential project on an infill site located within a transit priority area as specified by Public Resources Code § 21099. Accordingly, this EIR does not contain a separate discussion of the topic of Aesthetics, which can no longer be considered in determining the significance of the proposed project's physical environmental effects under CEQA. The EIR nonetheless provides visual simulations for informational purposes as part of **Chapter 2, Project Description**. In addition, parking is discussed for informational purposes in **Section 4.C, Transportation and Circulation**. (See pp. 4.A.1-4.A.3 for further discussion of SB 743 and Public Resources Code § 21099.)

As determined and guided by findings of the Initial Study (see **Appendix A**), this EIR assesses potentially significant impacts of the proposed project. As stated in *CEQA Guidelines* § 15121(a), an EIR is an informational document intended to inform public agency decision-makers and the public of the significant environmental effects of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project. CEQA requires that public agencies not approve projects until all feasible means available have been employed to substantially lessen the significant environmental effects of such projects.¹

Before any discretionary project approvals may be granted for the project, the San Francisco Planning Commission (Planning Commission) must certify the EIR as adequate, accurate, and objective. EIR adequacy is defined in *CEQA Guidelines* § 15151, Standards for Adequacy of an EIR, which states:

An EIR should be prepared with a sufficient degree of analysis to provide decisionmakers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the 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.

¹ "Feasible" means capable of being accomplished in a successful manner within a reasonable period of time taking into account economic, environmental, social, and technological factors (Public Resources Code § 21061.1).

The degree of specificity required in an EIR should “correspond to the degree of specificity involved in the underlying activity which is described in the EIR” (*CEQA Guidelines*, § 15146).

City decision-makers will use the certified EIR, along with other information and public processes, to determine whether to approve, modify, or disapprove the proposed project, and to require any feasible mitigation measures as conditions of project approval.

C. ENVIRONMENTAL REVIEW PROCESS

An Environmental Evaluation Application for the 1333 Gough Street/1481 Post Street project was submitted to the Planning Department on July 15, 2005. This application was revised on May 23, 2012 to reflect changes to the proposed project’s program and design.

The environmental review process for this project includes a number of steps: publication and circulation for public comment of a Notice of Preparation/Initial Study (NOP/IS), publication of a Draft EIR for public review and comment, preparation and publication of responses to public and agency comments on the Draft EIR, and certification of the Final EIR.

NOTICE OF PREPARATION/INITIAL STUDY

The Planning Department prepared an Initial Study and published a Notice of Preparation of an EIR on June 12, 2013, announcing its intent to prepare and distribute a focused EIR (the NOP/IS is presented as **Appendix A** to this EIR).

Environmental Effects Found to Be Less than Significant in the Initial Study

The NOP/IS found that the following potential individual and cumulative environmental effects of the project, as fully analyzed in the NOP/IS, would be less than significant:

- Land Use and Land Use Planning (the subtopic concerning division of an established community only)
- Aesthetics (the subtopic concerning light and glare only)
- Population and Housing
- Cultural and Paleontological Resources
- Air Quality (odors only)
- Greenhouse Gas Emissions
- Recreation
- Utilities and Service Systems
- Public Services
- Biological Resources

- Geology and Soils
- Hydrology and Water Quality
- Hazards and Hazardous Materials
- Mineral and Energy Resources
- Agricultural and Forest Resources

Environmental Effects Requiring Further Study in the EIR

The NOP/IS determined that the proposed project could result in potentially significant environmental impacts, and that an EIR is required under CEQA to analyze the following environmental topics:

- Land Use and Land Use Planning (except for the subtopic concerning division of an established community)
- Aesthetics (except for the subtopic concerning light and glare)
- Transportation and Circulation
- Noise
- Air Quality (except odors)
- Wind
- Shadow

As noted above, the proposed project is subject to SB 743, which eliminates aesthetics and parking as impacts that can be considered in determining the significance of physical environmental effects under CEQA for projects meeting certain criteria. Accordingly, this EIR does not contain a separate discussion of the topic of Aesthetics, although some information pertaining to aesthetics is provided for informational purposes. (See the visual simulations included in **Chapter 2, Project Description**, pp. 2.36-2.42.) Furthermore, this EIR discusses parking under the topic of Transportation and Circulation for informational purposes only. (See pp. 4.A.1-4.A.3 for further discussion of SB 743.)

PUBLIC REVIEW OF AND COMMENTS ON THE NOP/IS

Publication of the NOP/IS (included in this EIR as **Appendix A**) initiated a 30-day public review and comment period that ended on July 12, 2013. During the public review and comment period, the Planning Department received approximately 75 comment letters from interested parties. The comment letters received in response to the NOP/IS are available for review at the Planning Department offices as part of Case File No. 2005.0679E. The Planning Department has considered the comments made by the public in preparation of the Draft EIR for the proposed

project. Comments on the NOP/IS that relate to environmental issues are summarized below and are addressed in the NOP/IS or in this EIR, as noted.

Project Description

Duration of Project Construction Period

Comments express concern about impacts associated with the proposed project's 27-month-long construction period (as described in NOP/IS Chapter A, Project Description, on p. 26), particularly effects on senior residents of the retirement communities in the area. Comments note that The Sequoias retirement community includes a health center facility (licensed for 50 skilled nursing beds, 18 units of assisted living, and 19 memory care beds) near the west property line of the project site and the construction site of the proposed 1481 Post Street building. Construction-related impacts are discussed in this EIR in **Section 4.C, Transportation and Circulation**, on pp. 4.C.59-4.C.64, **Section 4.D, Noise**, on pp. 4.D.21-4.D.40, and **Section 4.E, Air Quality**, on pp. 4.E.28-4.E.37.

Renovation of the 1333 Gough Street Building

A comment asserts that that sponsor will likely undertake renovation of the existing 1333 Gough Street building and that the EIR should disclose this to account for the entirety of the project. The proposed project would entail alterations to the existing 1333 Gough Street building, which are described in EIR **Chapter 2, Project Description**, on pp. 2.21-2.23.

Plans and Policies

Comments express concern for, and opposition to, the proposed zoning amendment to reclassify the existing 240-E height and bulk limit for the project site, to a 410-G height and bulk limit. Comments also express concern for, and opposition to, the proposed amendment to the existing Planned Unit Development (PUD) to allow exceptions to applicable provisions of the Planning Code governing rear yard depth and dwelling unit exposure. Comments note the ongoing planning effort for the area under the Japantown Cultural Heritage and Economic Sustainability Strategy. Comments assert that the provision of parking under the proposed project is inconsistent with the City's "Transit First" policy. These issues are addressed in EIR **Chapter 3, Plans and Policies**, on pp. 3.1-3.6.

Comments assert that the proposed increase in the height and bulk limits of the project site could encourage re-zoning of other sites in the area. Potential growth-inducing impacts of the proposed project are discussed in EIR **Section 5.A, Growth-Inducing Impacts**, on pp. 5.1-5.3.

Land Use and Land Use Planning

Physical Division of an Established Community

Comments assert that the proposed project would physically divide the neighborhood. This issue is discussed in NOP/IS Section E.1, Land Use and Land Use Planning, on pp. 43-44.

Conflict with Land Use Plans and Policies

Comments note that the existing physical character of the project area is varied and includes finer-grained development to the north. Comments express concern for, and opposition to, the scale of the proposed 1481 Post Street building, and the proximity of the proposed 1481 Post Street building to the neighboring Sequoias complex. Comments state that the proposed project would intensify the existing non-conforming condition of The Sequoias tower with respect to height and bulk, and assert that the scale of the proposed building is appropriate for the Downtown Financial District but is not compatible with the surrounding area. Such comments do not raise any specific environmental issues that require discussion in this EIR. Such comments may be considered by the decision-makers as part of their decision to approve, modify, or disapprove the proposed project. This consideration is carried out independent of the environmental review process.

Effect on the Existing Character of the Vicinity

Comments express concern for the proposed café along Post Street, and for the residential dwelling unit density of the proposed 1481 Post Street building. Impacts of the proposed project on the land use character of the site and its surroundings are addressed in EIR **Section 4.B, Land Use and Land Use Planning**, on pp. 4.B.15-4.B.17.

Aesthetics

Comments express concern about the impact of the proposed project on private views, scenic vistas and scenic resources, and visual character and quality. Comments also express concern about impacts related to light and glare. As noted above, the proposed project is subject to Public Resources Code § 21099(d), which eliminates aesthetics and parking as impacts that can be considered in determining the significance of physical environmental effects under CEQA for projects meeting certain criteria. Accordingly, this EIR does not contain a separate discussion of the topic of Aesthetics. Comments related to aesthetic impacts do not raise any specific environmental issues that require discussion in this EIR. Such comments may be considered by the decision-makers as part of their decision to approve, modify, or disapprove the proposed project. This consideration is carried out independent of the environmental review process.

Population and Housing

Potential Relocation of Patients

Comments state that project construction could require relocation of patients within the health center facility located at the eastern end of The Sequoias complex near the construction site of the proposed 1481 Post Street building. NOP/IS Section E.3, Population and Housing, presents the relevant significance criteria related to displacement of persons on p. 47.

Population, Housing, and Employment Characteristics and Trends

Comments request that the EIR study population, housing, and employment characteristics and trends. Population, housing, and employment are discussed in NOP/IS Section E.3, Population and Housing, on p. 47. Comments state that the proposed project should include affordable housing. The City's affordable housing requirements are discussed in the NOP/IS on p. 50. Affordable housing issues may be considered by the decision-makers as part of their decision to approve, modify, or disapprove the proposed project. This consideration is carried out independent of the environmental review process.

Transportation and Circulation

Comments express concern for several issues under the topic of Transportation and Circulation: existing traffic conditions in the area; traffic associated with construction and operation of the proposed project combined with that of the nearby, approved CPMC Cathedral Hill medical campus; existing pedestrian safety issues at nearby intersections and midblock pedestrian crossings, particularly for seniors; pedestrian safety issues under the proposed project combined with those of the nearby, approved CPMC Cathedral Hill medical campus; potential hazards resulting from conflicts between vehicles and pedestrians at the proposed curb cut entrances/exits to and from the project site, particularly for seniors; emergency access to the neighboring Sequoias complex during project construction; the supply of parking in the area during project construction and operation; and the capacity of public transit in the area under the proposed project, and combined with construction of the CPMC Cathedral Hill medical campus. Impacts related to transportation and circulation are addressed in EIR **Section 4.C, Transportation and Circulation**, on pp. 4.C.36-4.C.80. Pursuant to SB 743, parking-related conditions are described for informational purposes only and comments related to parking do not raise any specific environmental issues that require discussion in this EIR. Such comments may be considered by the decision-makers as part of their decision to approve, modify, or disapprove the proposed project. This consideration is carried out independent of the environmental review process.

Noise

Comments express concern about the impact of project construction noise and vibration on neighboring properties, particularly effects on senior residents of the retirement communities in the area. Comments note that The Sequoias retirement community includes a health center facility near the west property line of the project site near the construction site of the proposed 1481 Post Street building and that construction noise and vibration could require temporary relocation of health center patients. Construction noise and vibration and impacts on sensitive receptors are addressed in EIR **Section 4.D, Noise**, on pp. 4.D.21-4.D.40.

Air Quality

Comments express concern about the impacts of project construction related to air quality, particularly effects on senior residents of the retirement communities in the area. Comments note that The Sequoias retirement community includes a health center facility near the west property line of the project site and the construction site of the proposed 1481 Post Street building. Construction impacts related to air quality and impacts on sensitive receptors are addressed in EIR **Section 4.E, Air Quality**, on pp. 4.E.28-4.E.37.

Greenhouse Gas Emissions

Comments express concern about the impact of the project related to the topic of greenhouse gas emissions. This topic is fully analyzed in NOP/IS Section E.8, Greenhouse Gas Emissions, on pp. 70-99, and no further discussion is necessary in the EIR.

Wind

Impact of Wind on Public Areas

Comments express concern that the proposed project could create hazardous ground-level wind conditions, particularly the effects of such conditions on senior residents of the area. A summary of applicable wind regulations and a presentation of data from the project's wind tunnel test are included in EIR **Section 4.F, Wind and Shadow**, on p. 4.F.3 and in EIR **Appendix B: Wind Study Tables**.

Impact of Wind on Private Property

Comments express concern that the proposed project could affect wind conditions at rooftop common open space on The Sequoias property. The relevant CEQA significance criterion for wind impacts is presented in NOP/IS Section E.9 on p. 86, and in EIR **Section 4.F, Wind and Shadow**, on pp. 4.F.3-4.F.4. The issue of wind on private property is addressed on p. 4.F.5.

Shadow

Impact of Shadow on Public Areas

Comments express concern that the proposed project could create new shadow on nearby streets and public open spaces in the vicinity of the project site. Information about project shadow on public open spaces and an evaluation of shadow impacts on public open spaces are presented in EIR **Section 4.F, Wind and Shadow**, on pp. 4.F.30-4.F.43.

Impact of Shadow on Private Property

Comments express concern that the proposed project could create new shadow on nearby private property, blocking sunlight to indoor spaces and outdoor common open spaces. Comments assert that such shadow poses a hardship for seniors in particular. The relevant CEQA significance criterion for shadow impacts is presented in NOP/IS Section E.9 on p. 86, and in EIR **Section 4.F, Wind and Shadow**, on p. 4.F.27. The issue of shadow on private property is addressed on p. 4.F.29.

Geology and Soils

Impact of Excavation on Adjacent Property

Comments express concern for the potential impact of project excavation and construction within the project site on the stability of the adjacent Sequoias property. This issue is addressed in NOP/IS Section E.14, Geology and Soils, on pp. 116-117. No further discussion is required in the EIR.

Building Code Requirements

A comment asserts that the *Preliminary Geotechnical Evaluation* should be updated to address current standards under the 2013 California Building Code. No such update is required. The purpose of a *Preliminary Geotechnical Evaluation* is to describe the geotechnical conditions of the project site and develop recommendations for the geotechnical aspects of the proposed new construction. If the proposed project is approved, conformity with applicable building code requirements will be assured as part of a separate review by the San Francisco Department of Building Inspection, independent of the environmental review process under CEQA.

Hazards and Hazardous Materials

Comments express concern for the potential release of hazardous material during construction of the proposed project. This issue is adequately addressed in NOP/IS Section E.16, Hazards and Hazardous Materials, on pp. 126-127. No further discussion of this topic is required in the EIR.

Alternatives

Description of EIR Alternatives in the NOP/IS

A comment asserts that the NOP/IS is inadequate because the NOP/IS does not identify the alternatives to be studied in the EIR. CEQA does not require that an NOP/IS prospectively identify the alternatives that are to be studied in the EIR.

EIR Alternatives Suggested by Comments

Comments suggest the following alternatives: an alternative in which all passenger and delivery vehicles would enter from, and exit to, Geary Boulevard, and in which open space and a fitness center addition would be located along Post Street; an alternative that would increase the distance between the project tower and the neighboring Sequoias complex; an alternative that calls for construction of a new building as a 240-foot-tall addition to the existing 1333 Gough Street building; and an alternative that calls for demolition of the existing 1333 Gough Street building and construction of a 240-foot-tall replacement building. Comments also suggest that the project sponsor look elsewhere for an appropriate site to construct a residential tower. These suggested alternatives are discussed in EIR **Section 6.E, Alternatives Considered but Rejected**, beginning on p. 6.60.

Comments request that the EIR include an EIR alternative that conforms to the Planning Code. A code-conforming alternative is included in this EIR. See EIR **Section 6.C, Alternative B: Code-Compliant Alternative**, beginning on p. 6.9.

The Planning Department received an additional comment after close of the NOP/IS public review period, during preparation of the Draft EIR. The comment asserts that the range of alternatives presented in the first administrative draft of the Draft EIR (ADEIR 1), provided to the Planning Department for preliminary review, was inadequate under the requirements of CEQA, and requests that an additional alternative be analyzed in the Draft EIR. The comment includes a specific use program, plans, and architectural renderings for the requested alternative. The Planning Department has determined in its discretion that the requested alternative should be included among the alternatives analyzed in the Draft EIR. See EIR **Section 6.E, Alternative D: Reduced Tower Footprint and Height Alternative**, beginning on p. 6.42.

EIR **Chapter 6, Alternatives**, presents and analyzes a reasonable range of feasible alternatives to the proposed project. No significant unavoidable impacts are identified for the proposed project in this EIR. As such, no analysis of alternatives to the proposed project is required under *CEQA Guidelines* § 15126.6. However, alternatives are presented and analyzed in this EIR for the purpose of fostering informed decision-making by presenting a range of alternatives that could

lessen the less-than-significant impacts identified for the proposed project, while feasibly attaining most of the basic project objectives.

Comments Expressing Concern for, or Opposition to, the Proposed Project

Comments express concern for, or opposition to, the proposed project (or particular aspects thereof). To the extent that such comments are based on potential physical environmental effects under CEQA, these effects are addressed in this EIR and/or the NOP/IS under the relevant environmental topic or topics.

Other comments express concern for, or opposition to, the proposed project (or particular aspects thereof) based on the relative balance of costs and benefits accruing to the neighborhood and City as a consequence of approving the proposed project, or based on aesthetics or parking concerns. Such comments do not raise any specific environmental issues that require discussion in this EIR. Such comments may be considered by the decision-makers as part of their decision to approve, modify, or disapprove the proposed project. This consideration is carried out independent of the environmental review process.

DRAFT EIR

This Draft EIR has been prepared in accordance with CEQA and the *CEQA Guidelines*. It provides an analysis of the project-specific physical environmental impacts of construction and operation of the proposed project, and the project's contribution to the environmental impacts from foreseeable cumulative development in the project site vicinity and the City as a whole.

Copies of the Draft EIR are available at the Planning Information Counter, San Francisco Planning Department, 1660 Mission Street, 1st Floor, San Francisco, CA 94103. The Draft EIR is also available for viewing or downloading at the Planning Department website, <http://tinyurl.com/sfceqadocs>, by choosing the link for Negative Declarations and EIRs under "Current Documents for Public Review" and searching for Case File No. 2005.0679E. You may also request that a copy be sent to you by calling (415) 575-9033 or emailing the EIR Coordinator, Michael Jacinto, at michael.jacinto@sfgov.org.

Specific technical studies prepared for the environmental analysis of the 1333 Gough Street/1481 Post Street project include the following:

- *Archaeological Research Design and Treatment Plan for the 1333 Gough Street at Post Project*, by Archeo-Tech (2006) and Addendum (2007);
- *Preliminary Geotechnical Evaluation, 1333 Gough Street, San Francisco, California*, by Treadwell & Rollo (2006);
- *GHG Analysis Compliance Checklist*, by Turnstone Consulting (2013);

- *Transportation Impact Study*, by LCW Consulting (2014);
- *Environmental Noise Assessment*, by Brown-Buntin Associates (2013);
- *Air Quality Technical Memo*, by Aspen Environmental (2013);
- *Pedestrian Wind Study*, by RWDI (2013); and
- *Shadow Calculations and Diagrams*, by CADP (2013).

All documents referenced in this Draft EIR, and the distribution list for the Draft EIR, are available for review at the San Francisco Planning Department, 1650 Mission Street, Suite 400, San Francisco, CA 94103, as part of Case File No. 2005.0679E.

How to Comment on the Draft EIR

This Draft EIR was published on July 30, 2014. There will be a public hearing before the Planning Commission during the 45-day public review and comment period for this EIR to solicit public comment on the adequacy and accuracy of information presented in this Draft EIR. The public comment period for this EIR is July 31, 2014 to September 15, 2014. The public hearing on this Draft EIR has been scheduled before the Planning Commission for September 4, 2014 in Room 400, City Hall, 1 Dr. Carlton B. Goodlett Place beginning at 12:00 p.m. or later. Please call (415) 558-6422 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 adequacy of the document, that is, whether this Draft EIR identifies and analyzes the possible environmental impacts and identifies appropriate mitigation measures. Comments are most helpful when they suggest specific alternatives and/or additional measures that would better mitigate significant environmental effects.

Written comments should be submitted to:

Sarah B. Jones, Environmental Review Officer
Re: 1333 Gough Street/1481 Post Street Project Draft EIR
San Francisco Planning Department
1650 Mission Street, Suite 400
San Francisco, CA 94103

Comments may also be submitted by email to sarah.b.jones@sfgov.org. Comments must be received by 5:00 p.m. on September 15, 2014.

Commenters are not required to provide personal identifying information. 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.

Only commenters on the Draft EIR will be permitted to file an appeal of the certification of the Final EIR to the Board of Supervisors.

FINAL EIR

Following the close of the Draft EIR public review and comment period, the Planning Department will prepare and publish a document entitled “Responses to Comments,” which will contain a copy of all comments on this Draft EIR and the City’s responses to those comments, along with copies of the letters received and a transcript of the Planning Commission public hearing on the Draft EIR. This Draft EIR, together with the Responses 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.

The Planning Commission and the Board of Supervisors will use the information in the Final EIR in their deliberations on whether to approve, modify, or deny the proposed project or aspects of the proposed project. If the Planning Commission and the Board of Supervisors decide to approve the proposed project, their approval action must include findings that identify significant project-related impacts that would result; discuss mitigation measures or alternatives that have been adopted to reduce significant impacts to less-than-significant levels; determine whether mitigation measures or alternatives are within the jurisdiction of other public agencies; and explain reasons for rejecting mitigation measures or alternatives if any are infeasible for legal, social, economic, technological, or other reasons.

A Mitigation Monitoring and Reporting Program (MMRP) must be adopted by the Planning Commission and the Board of Supervisors as part of the adoption of the CEQA findings and project approvals by those bodies to the extent that mitigation measures are made part of the proposed project. The MMRP identifies the measures included in the proposed project or imposed by the decision-makers as conditions of approval, the entities responsible for carrying out the measures, and the timing of implementation. If significant unavoidable impacts would remain after all feasible mitigation measures are implemented, the approving body, if it elects to approve the proposed project, must adopt a statement of overriding considerations explaining how the benefits of the proposed project would outweigh the significant impacts.

D. ORGANIZATION OF THIS EIR

This EIR is organized into eight chapters and two appendices, as described below.

The Summary chapter provides a concise overview of the proposed project and the necessary approvals; the environmental impacts that would result from the proposed project; mitigation

measures identified to reduce or eliminate these impacts; project alternatives; and areas of known controversy and issues to be resolved.

Chapter 1, Introduction, describes the type, purpose, and function of the EIR; the environmental review process and comments received on the NOP/IS; and the organization of the EIR.

Chapter 2, Project Description, presents details about the proposed project and the approvals required to implement it.

Chapter 3, Plans and Policies, describes inconsistencies of the proposed project with applicable federal, state, regional, and local plans and policies.

Chapter 4, Environmental Setting, Impacts, and Mitigation, addresses the following topics: Land Use and Land Use Planning; Transportation and Circulation; Noise; Air Quality; and Wind and Shadow. Each topic section includes the environmental setting; regulatory framework; approach to analysis, when appropriate; project-specific and cumulative impacts; and mitigation measures and improvement measures, when appropriate.

Chapter 5, Other CEQA Issues, addresses potential growth-inducing impacts of the proposed project and identifies significant effects that cannot be avoided if the proposed project is implemented, as well as significant irreversible impacts of the project, and areas of known controversy and project-related issues that have not been resolved.

Chapter 6, Alternatives, presents and analyzes a range of alternatives to the proposed project. Four alternatives are described and evaluated: Alternative A: No Project Alternative, Alternative B: Code-Compliant Alternative, Alternative C: Reduced Height/Full Program Alternative, and Alternative D: Reduced Tower Footprint and Height Alternative. This chapter identifies the environmentally superior alternative. It also discusses any alternatives considered for analysis in the EIR but rejected, and gives the reasons for rejection.

Chapter 7, Report Preparers, identifies the EIR authors and the agencies, organizations, and individuals who were consulted during preparation of the Draft EIR. In addition, the project sponsor, their attorneys, and any consultants working on their behalf are listed.

Appendix A: Notice of Preparation/Initial Study, presents the NOP/IS for the proposed project.

Appendix B: Wind Study Tables, presents two tables that summarize analyses from the *Pedestrian Wind Study* prepared for the proposed project.

2. PROJECT DESCRIPTION

A. PROJECT OVERVIEW

The project site is owned by Cathedral Hill Associates, L.P., an affiliate of ADCO (the project sponsor). The project site is located on the south side of Post Street near the intersection of Post and Gough streets in Cathedral Hill, at the eastern edge of the Japantown neighborhood, in the City's Western Addition. The project site is a single lot encompassing all of Assessor's Block 697/Lot 37, bounded by Post Street on the north, Gough Street on the east, Geary Boulevard on the south, and its west property line. The eastern portion of the project site is currently developed with an existing residential building, 1333 Gough, constructed in 1965 (169 units, 14 stories, about 138 feet tall, and 214,400 gross square feet [gsf] of residential use). An existing parking garage structure (163 spaces, 65,100 gsf) wraps around the ground-floor base of 1333 Gough to its north, west, and south. Two surface parking lots at the northeast and southeast corners of the project site together provide 13 spaces. The Cathedral Hill Plaza Athletic Club operates a fitness center (about 4,700 gsf) in the ground floor of 1333 Gough Street, which is open to paying members of the public. A terrace for the residents of 1333 Gough Street, two outdoor tennis courts, and a one-story pool building (permanently closed in February 2010) are located on the roof of the parking structure.

The project sponsor proposes demolition of the existing parking structure (together with the common open space terrace, tennis courts, and pool building that sit atop the parking structure) and construction of a new 262-unit, 36-story, 398-foot-tall (416 feet tall including an 18-foot-tall mechanical penthouse), 437,500-gsf residential building (the proposed 1481 Post Street building) west of 1333 Gough Street on the project site. The new building would include a 2,230-gsf café along Post Street at the northwest corner of the project site. Along the west property line on the project site, the proposed project would include a 10-foot-wide, publicly accessible walkway that would facilitate midblock pedestrian passage between Post Street and Geary Boulevard.

The proposed project also includes construction of a subsurface parking garage (about 180,000 gsf) with two physically separate parking areas, the first to serve the residents of the proposed 1481 Post Street building and the second to serve the existing 1333 Gough Street building. The four-level 1481 Post Street portion of the proposed parking garage would occupy the western portion of the project site and would include 262 independently accessible parking spaces. The two-level 1333 Gough Street portion of the garage would generally occupy the eastern portion of the project site and would include 176 independently accessible parking spaces to replace the existing 176 spaces for 1333 Gough Street and 4 carshare spaces. The portion of the garage serving the residents of the 1481 Post Street building would be physically divided from the

portion of the garage serving tenants of the 1333 Gough Street building. Each portion of the garage would be served by independent entrances and exits. The 1481 Post portion of the garage would have access from, and egress to, Post Street. The 1333 Gough portion of the garage would have access from, and egress to, Post Street and Gough Street at the northeast corner of the project site.

The proposed project includes renovation of the existing fitness center at the ground floor of 1333 Gough Street and construction of a new indoor swimming pool addition (about 8,000 gsf) fronting Geary Boulevard. The upgraded facility would continue to be open to the public for membership. The existing tennis courts would not be replaced under the proposed project. A common second-floor open space terrace for the residents of the proposed 1481 Post Street building would be provided atop the loading area, the 1481 Post Street garage ramp and driveway, and the proposed pool addition. Another common open space for 1481 Post Street residents would be provided atop the proposed café. A separate common open space garden for residents of 1333 Gough Street would be provided at ground level along Gough Street.

The proposed project also includes three project variants to consider optional schemes for vehicular access and sidewalk widths. These variants are analyzed in **Section 4.C, Transportation and Circulation**, and considered in the context of the alternatives presented in **Chapter 6, Alternatives**. However, the proposed project presented in this Project Description represents the project sponsor's proposal.

B. PROJECT SPONSOR'S OBJECTIVES

The project sponsor seeks to achieve the following objectives by undertaking the 1333 Gough Street/1481 Post Street project:

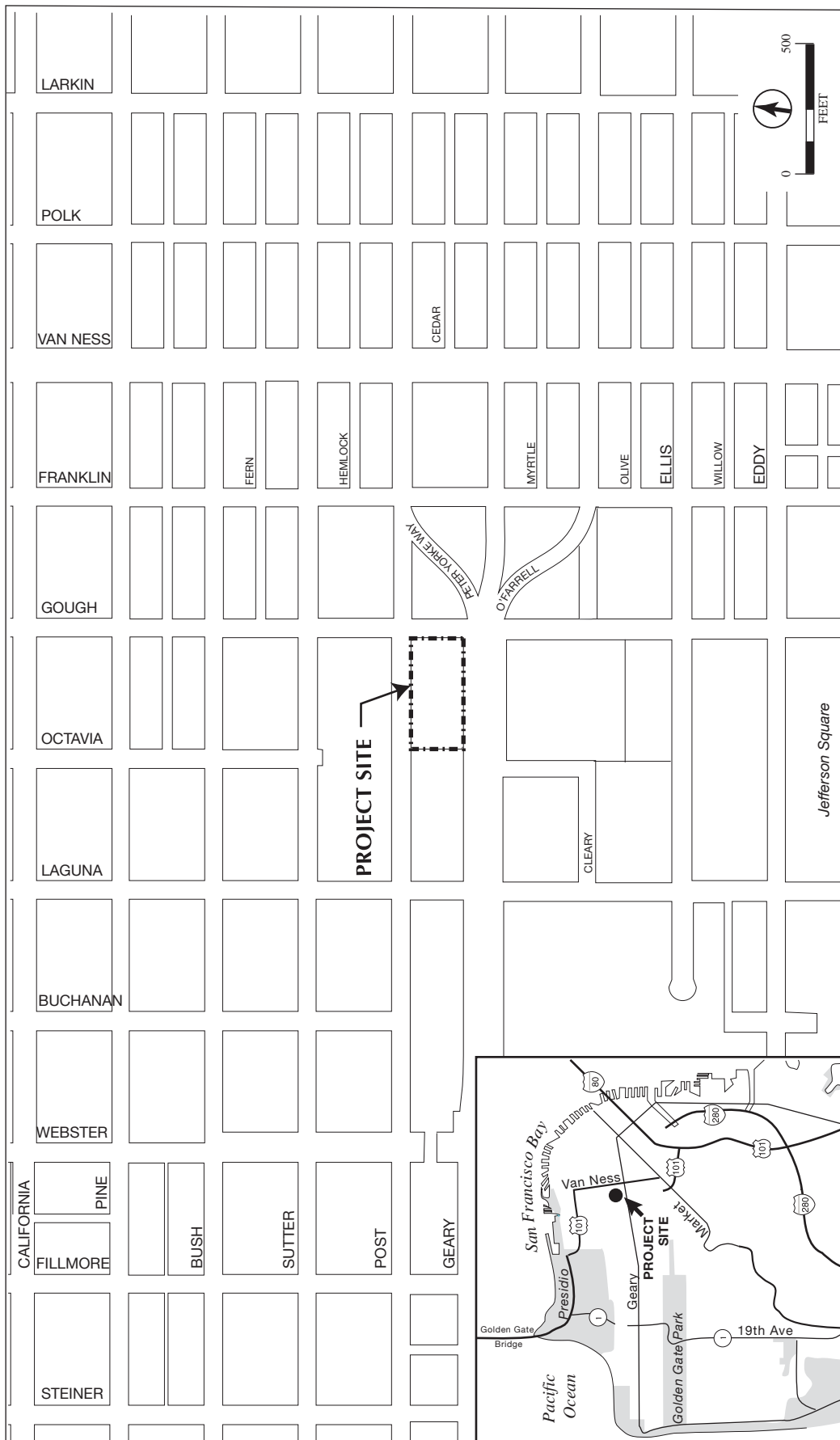
- To improve the architectural and urban design character of Cathedral Hill by replacing the existing above-grade parking garage with a high-quality residential project with ground-floor open space, a garden, and other active uses.
- To construct a high-density residential project in order to increase the City's supply of housing with a range of unit sizes, and assist in satisfying the City's affordable housing goals by meeting the City's inclusionary affordable housing requirements.
- To maintain the existing housing stock on the project site.
- To replace the existing above-grade parking garage with an iconic residential tower that is distinguished in height from the adjacent Sequoias Tower and the existing 1333 Gough Building in order to create a more varied skyline that accentuates and follows the rhythm of the topography.
- To develop a project that achieves high-quality urban design and LEED Gold or equivalent sustainability standards while enhancing the existing urban design character of the area.

- To construct streetscape improvements and open space that serves neighborhood residents and workers, San Franciscans, and Cathedral Hill visitors.
- To increase pedestrian activity on Cathedral Hill during both daytime and evening hours through streetscape improvements, active uses, and more “eyes on the street.”
- To improve the streetscape along the Geary and Post Street frontages of the project site in order to enhance the pedestrian experience and better connect the Cathedral Hill and Japantown neighborhoods.
- To create a substantial increment of additional residential density to be served by the future Geary Bus Rapid Transit project.
- To relocate the curb cuts serving the project site in order to enhance the pedestrian experience and to eliminate the existing use of driveways within the project site by drivers seeking to make illegal U-turns.
- To maintain the existing rent-controlled housing stock provided by 1333 Gough on the project site and to protect tenants of 1333 Gough from displacement.
- To provide sufficient parking for residents and visitors of the project.
- To complete the project on schedule and within budget.
- To construct a high-quality project that includes a sufficient number of residential units to make economically feasible the demolition and replacement of the existing above-grade parking garage, produce a reasonable return on investment for the project sponsor and its investors, attract investment capital and construction financing, and generate sufficient revenue to finance the open space amenities proposed as part of the project.

C. PROJECT LOCATION AND SITE

The project site is located on the south side of Post Street near the intersection of Post and Gough streets in Cathedral Hill, at the eastern edge of the Japantown neighborhood, in the City’s Western Addition. (See **Figure 2.1: Project Location.**) It is a single lot encompassing all of Assessor’s Block 697/Lot 37, bounded by Post Street on the north, Gough Street on the east, Geary Boulevard on the south, and its west property line. The rectangular project site measures about 411 feet from east to west and about 197 feet north to south, encompassing an area of approximately 80,864 square feet (sq. ft.) or 1.86 acres. The site currently is improved with a multi-family residential building at the eastern end of the project site, known as 1333 Gough Street, which is the current address associated with the entire project site. (The 1481 Post Street address used in this document refers to the proposed residential building that would be constructed at the western end of the project site under the proposed project.)

The project site is entirely within the RM-4 (Residential Mixed, High Density) District and the 240-E Height and Bulk District. It was once within the former Western Addition A-1 Redevelopment Area (expired in May 2000) which covered the area delineated by Post, Franklin, Broderick, and Eddy streets.



SOURCE: Turnstone Consulting

1333 GOUGH STREET/1481 POST STREET

2005.0679E

FIGURE 2.1: PROJECT LOCATION

The project site is currently occupied by an existing residential building, common and private open space, a parking structure, two surface parking lots, and a private, members only fitness center, which includes exercise facilities in the 1333 Gough Street building, outdoor tennis courts, and a swimming pool building (now closed) atop the parking structure. Together, existing uses on the project site total about 284,200 gsf, as shown in **Table 2.1: Existing Uses on the Project Site**.

Table 2.1: Existing Uses on the Project Site

Use	Gross Square Feet
Residential	214,400 gsf
Parking Structure	65,100 gsf
Fitness Center	4,700 gsf
Total gsf	284,200 gsf

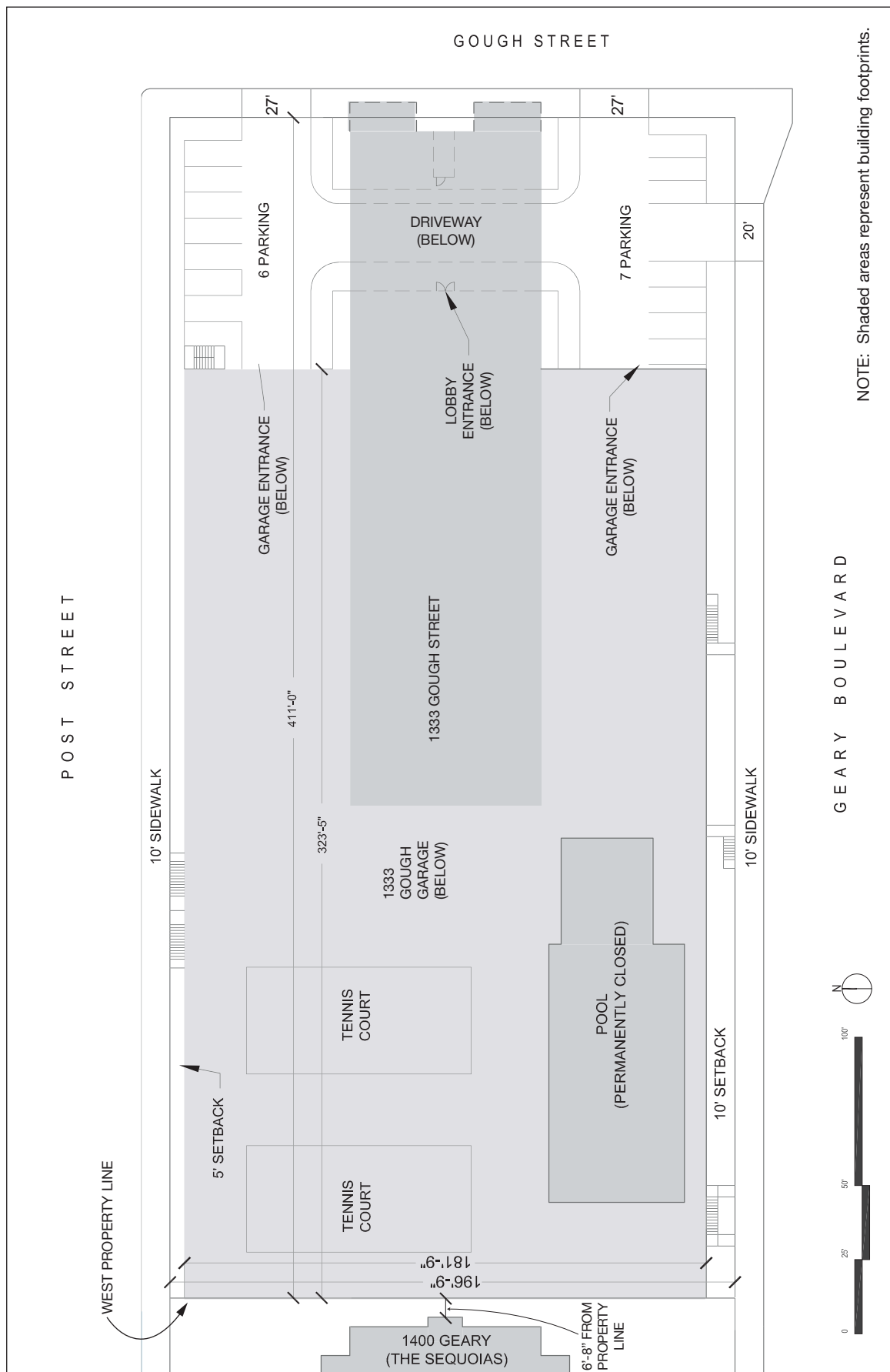
Source: Cathedral Hill Associates, L.P., 2013

1333 Gough Street Building

The eastern portion of the project site is currently occupied by a 169-unit, 14-story (about 138-foot-tall), 214,400-gsf apartment building (1333 Gough Street), constructed in 1965 under the former Western Addition A-1 Redevelopment Plan. The existing building contains about 188,900 gsf of residential use, 3,700 gsf of lobby space, and about 17,100 gsf of building services/mechanical and storage space. The building also contains a 4,700-gsf fitness center (discussed below as a separate use).

The 235-foot length of the building slab is oriented east-west, running parallel to Post Street to the north and Geary Boulevard to the south. (See **Figure 2.2: Existing Site Plan**.) The eastern end of the building slab (about one-quarter of the building's length) is raised on piles, creating a covered area beneath the raised eastern end of the building. The building's lobby entrance at the ground floor faces east onto this covered area and is set back from the Gough Street sidewalk and the eastern face of the building above by about 55 feet, creating a sheltered porte-cochere¹ at the building's entrance. A passenger drop-off at the lobby entrance is accessed from a grade-level driveway that runs beneath the raised eastern end of the building and connects to Gough Street by curb cuts at its north and south ends as well as a curb cut leading to Geary Boulevard just west of Gough Street.

¹ Porte-cochere is a roofed structure extending from the entrance of a building over an adjacent driveway sheltering those getting in or out of vehicles.



SOURCES: SLCE Architects / MWA Architects

1333 GOUGH STREET/1481 POST STREET

2005.0679E

FIGURE 2.2: EXISTING SITE PLAN

Parking

The existing structured parking on the project site contains 163 residential spaces, and the two surface parking lots provide 13 spaces (7 visitor and 6 residential), for a total 176 spaces. The parking structure occupies a total of about 65,100 gsf of building area.

The existing two surface parking lots are located at the northeast and southeast corners of the project site. Access to and egress from the parking lot at the northeast corner of the project site is from Gough Street. Access to and egress from the parking lot at the southeast corner of the project site is from Gough Street as well as from Geary Boulevard. A two-way driveway running north/south beneath the raised eastern end of the building (discussed above) connects the two parking lots.

The first level of parking is located along the north and south sides, and a portion of the western end of 1333 Gough Street at grade along Post Street and Geary Boulevard, respectively. The second level of parking is located at the western end of the project site (below the existing tennis courts), one-half level down by ramp from the first level. The second level is partially above grade and partially below grade. A third level of parking is located below grade, one-half level down by ramp from the second level.

Fitness Center

The private, members-only Cathedral Hill Plaza Athletic Club operates a fitness center (about 4,700 gsf) in the first floor of 1333 Gough Street. Fitness center membership is open to residents of the 1333 Gough Street building and to non-residents. The fitness center is accessible through the building's lobby entrance. Current fitness center membership is about 200.

Atop parking level 2 at the western portion of the project site are two outdoor tennis courts (about 17,300 sq. ft.), accessible via the fitness center. The tennis courts are used by about 25 people per week. Also atop the parking structure at the west end of the project site is a one-story pool building (about 5,200 gsf). The pool facility was permanently closed in February 2010.

Common and Private Open Space

About 42,000 sq. ft. of common open space is available to building residents on the rooftop of the one-story parking structure that wraps around the base of 1333 Gough Street along its north, west, and south façades. The common open space is accessible from the second floor of 1333 Gough Street through doorways roughly at the midpoint of the building's south façade and at the southwest corner of 1333 Gough Street.

Existing private open space (totaling about 18,740 sq. ft.) is provided in the form of private terraces on the rooftop of the parking garage structure for 13 units at the 2nd floor (totaling about 4,916 sq. ft.), and private balconies for 144 units at the 3rd through 14th floors (totaling about 13,824 sq. ft.). One unit on each of the 3rd through 14th floors (12 units) has no private open space and is served by the existing common open space on the roof of the garage structure.

D. PROJECT CHARACTERISTICS

The proposed project includes demolition of the existing parking garage structure (including the existing fitness center's tennis courts and pool building, and private open space atop the parking garage) and the surface parking lots at the northeast and southeast corners of the project site, construction of a new 262-unit, 36-story, 398-foot-tall residential building (a 416-foot-tall building with the 18-foot-tall mechanical penthouse), modifications to the 169-unit 1333 Gough Street building, and construction of a new subsurface parking garage, as described below. (See **Table 2.2: Summary of Existing and Proposed Uses on the Project Site.**)

Table 2.2: Summary of Existing and Proposed Uses on the Project Site

Uses	Existing Uses	Existing Uses to Be Retained	New Construction/ Addition	Project Totals
Residential	214,400 gsf	214,400 gsf	437,500 gsf	651,900 gsf
Fitness Center	4,700 gsf ¹	4,700 gsf ¹	8,000 gsf	12,700 gsf
Parking	65,100 gsf	0 gsf	180,000 gsf	180,000 gsf
Café	0 gsf	NA	2,230 gsf	2,230 gsf
Total gsf	284,200 gsf	219,100 gsf	627,730 gsf	846,830 gsf
Dwelling Units	169 units	169 units	262 units	431 units
Parking Spaces				
Residential	169 spaces	0 spaces ²	431 spaces	431 spaces
Visitor	7 spaces	0 spaces ²	7 spaces	7 spaces
Carshare	0 spaces	NA	4 spaces	4 spaces
Total Spaces	176 spaces	0 spaces	442 spaces	442 spaces
Loading Spaces	0 spaces	NA	2 spaces	2 spaces

Notes:

¹ The existing pool building is not included in this amount, as it was permanently closed in 2010. The existing tennis courts are not included in this amount, as they are unenclosed, outdoor space.

² The existing 176 parking spaces within the existing parking structure at 1333 Gough Street would be demolished and would be replaced in a proposed new parking structure that would be constructed under the proposed project.

Sources: SLCE Architects and MWA Architects

PROPOSED 1481 POST STREET BUILDING USES

Residential

The proposed 262-unit 1481 Post Street building's residential use (437,500 gsf total) would consist of approximately 136 one-bedroom units, 86 two-bedroom units, 36 three-bedroom units, and 4 four-bedroom units (in addition to building circulation, a fitness amenity, mechanical space, and building services).

Ground Floor

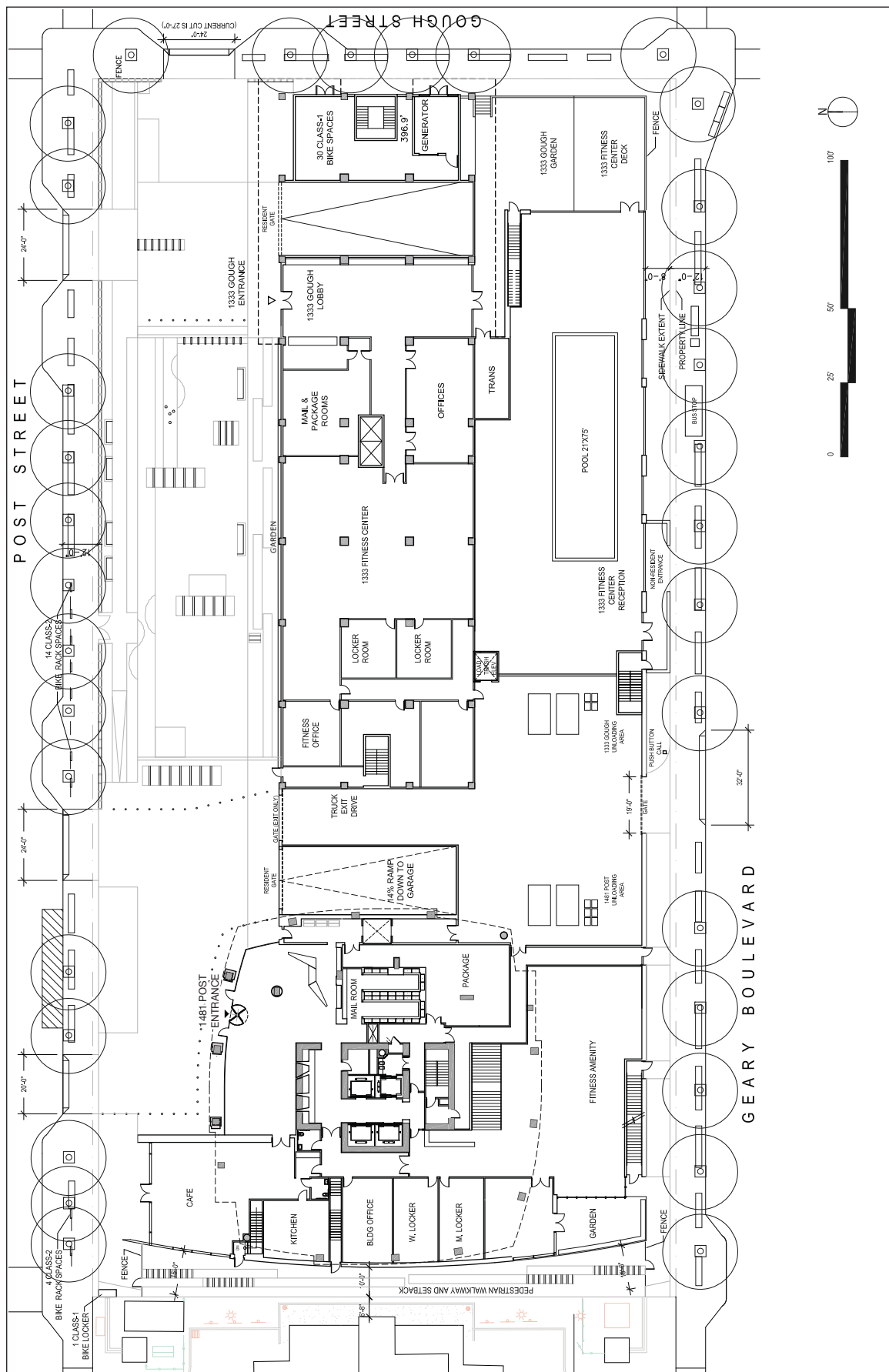
Residential pedestrian access to the ground floor of the proposed building would be through lobby entrance doors that would be located on the north side of the proposed 1481 Post Street building facing Post Street, set back from Post Street by about 47 feet. (See **Figure 2.3: Proposed Ground Floor Plan**.) The ground-floor lobby would be 3,387 gsf. The ground floor would also include a fitness amenity (5,680 gsf) for building residents (in contrast to the fitness center provided at 1333 Gough Street that would continue to be open to membership for the paying public, the fitness amenity located within 1481 Post Street would be open solely to residents of 1481 Post Street), and building services (e.g., management office, mail room, trash and recycling area) totaling 1,757 gsf.

Second Floor

From the ground-floor lobby, residents would access elevators or stairs to the upper floors. The second floor would include additional amenities for building residents (including a swimming pool and spa tub, event space, resident's lounge, play room, and screening room) totaling 12,437 gsf, as well as shared circulation and common areas (totaling 1,151 gsf) and mechanical space (totaling 1,236 gsf). (See **Figure 2.4: Proposed 2nd Floor Plan**.)

Upper Residential Floors

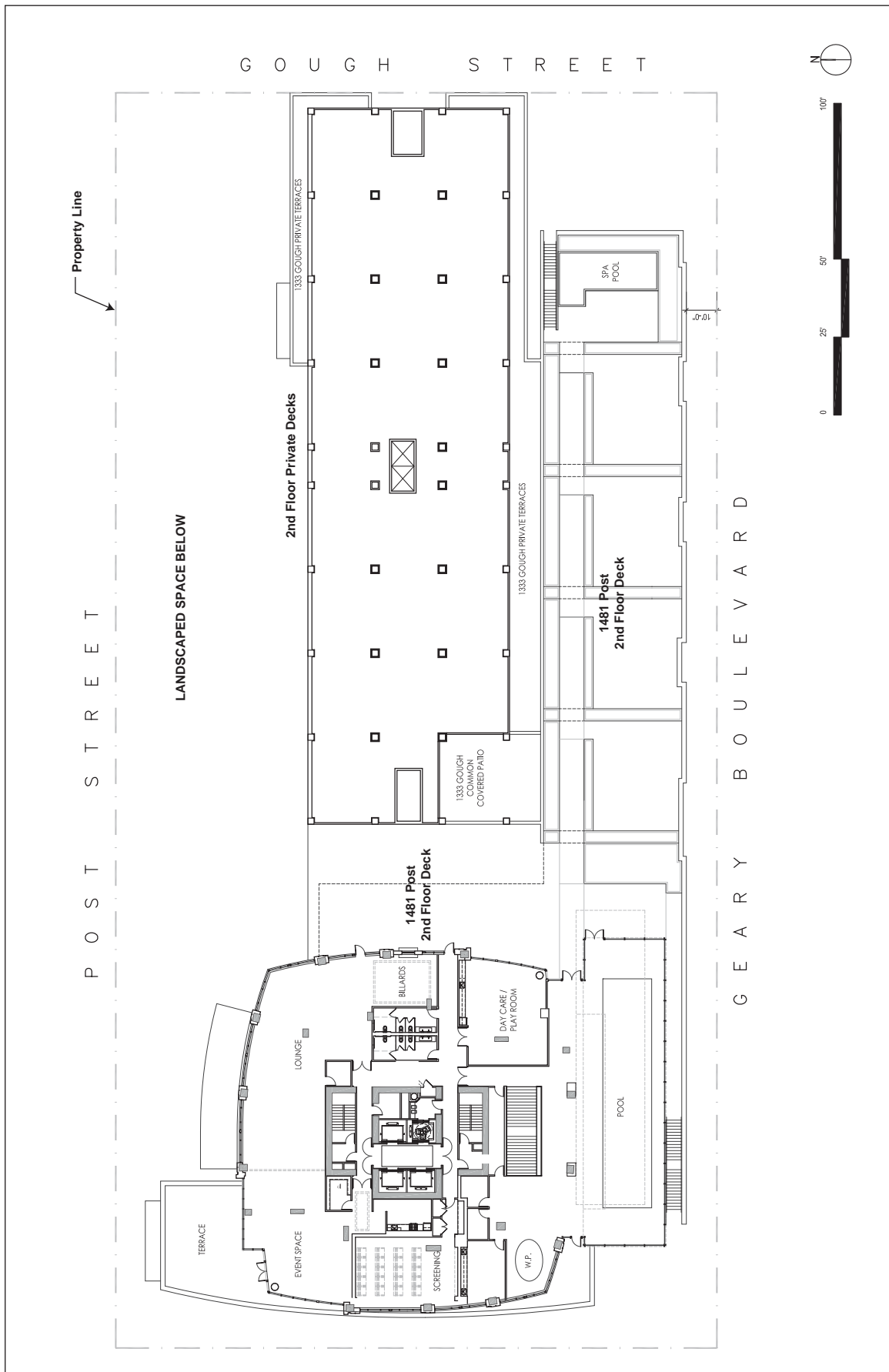
Residential units would be located on the 3rd through the 36th floors. (See **Figure 2.5: Proposed Representative 3rd Floor through 29th Floor Tower Plan**; **Figure 2.6: Proposed Representative 30th Floor through 33rd Floor Tower Plan**; **Figure 2.7: Proposed Representative 34th Floor through 35th Floor Tower Plan**; **Figure 2.8: Proposed Representative 36th Floor Tower Plan**; and **Figure 2.9: Proposed Mechanical and Penthouse Plan**.) Residential floors would also include shared circulation and common areas (totaling 26,446 gsf) and mechanical space (totaling 42,024 gsf).



SOURCES: SLCE Architects / MWA Architects

1333 Gough Street/1481 Post Street

2005.0679E

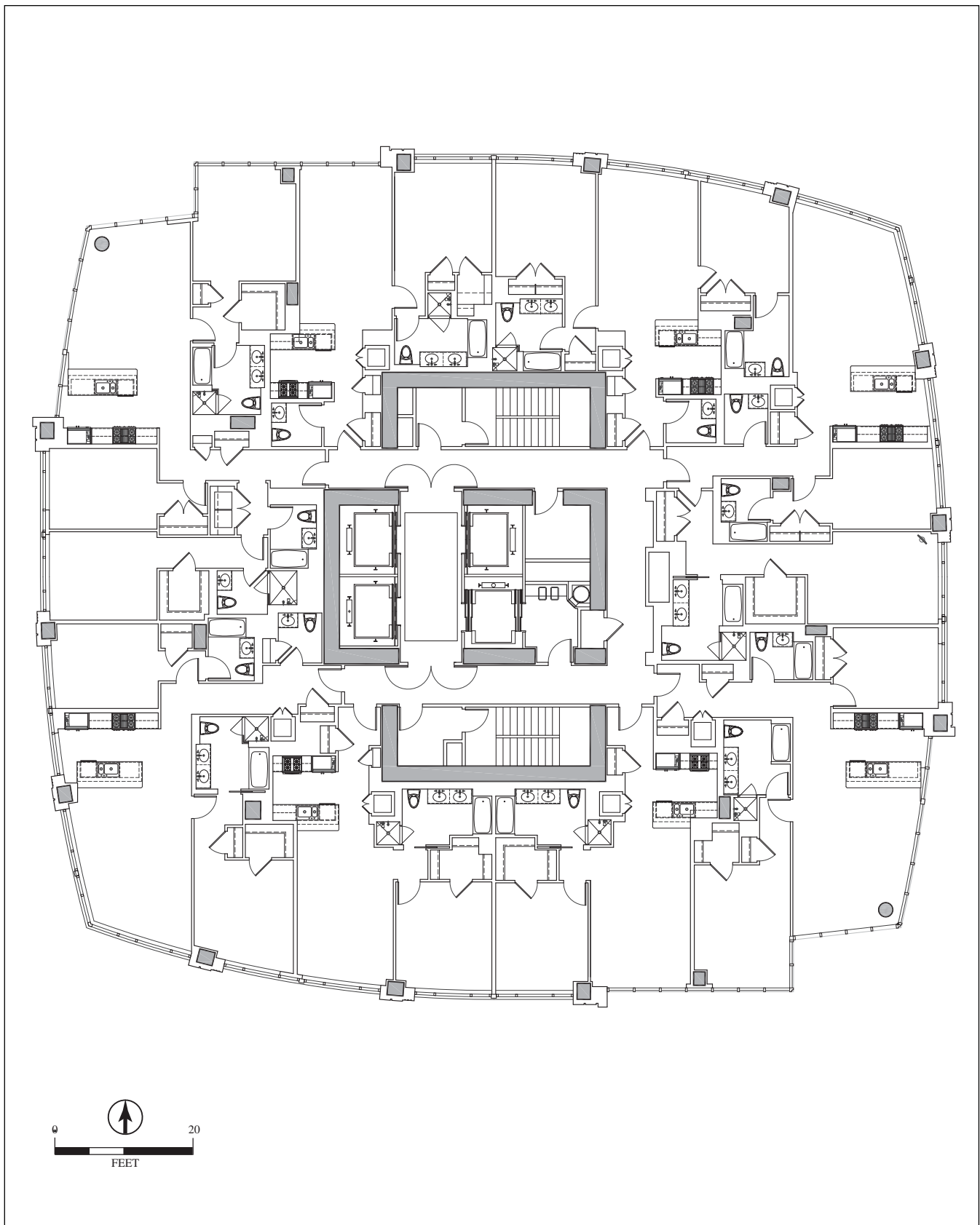


SOURCES: SLCE Architects / MWA Architects

1333 GOUGH STREET/1481 POST STREET

2005.0679E

FIGURE 2.4: PROPOSED 2ND FLOOR PLAN

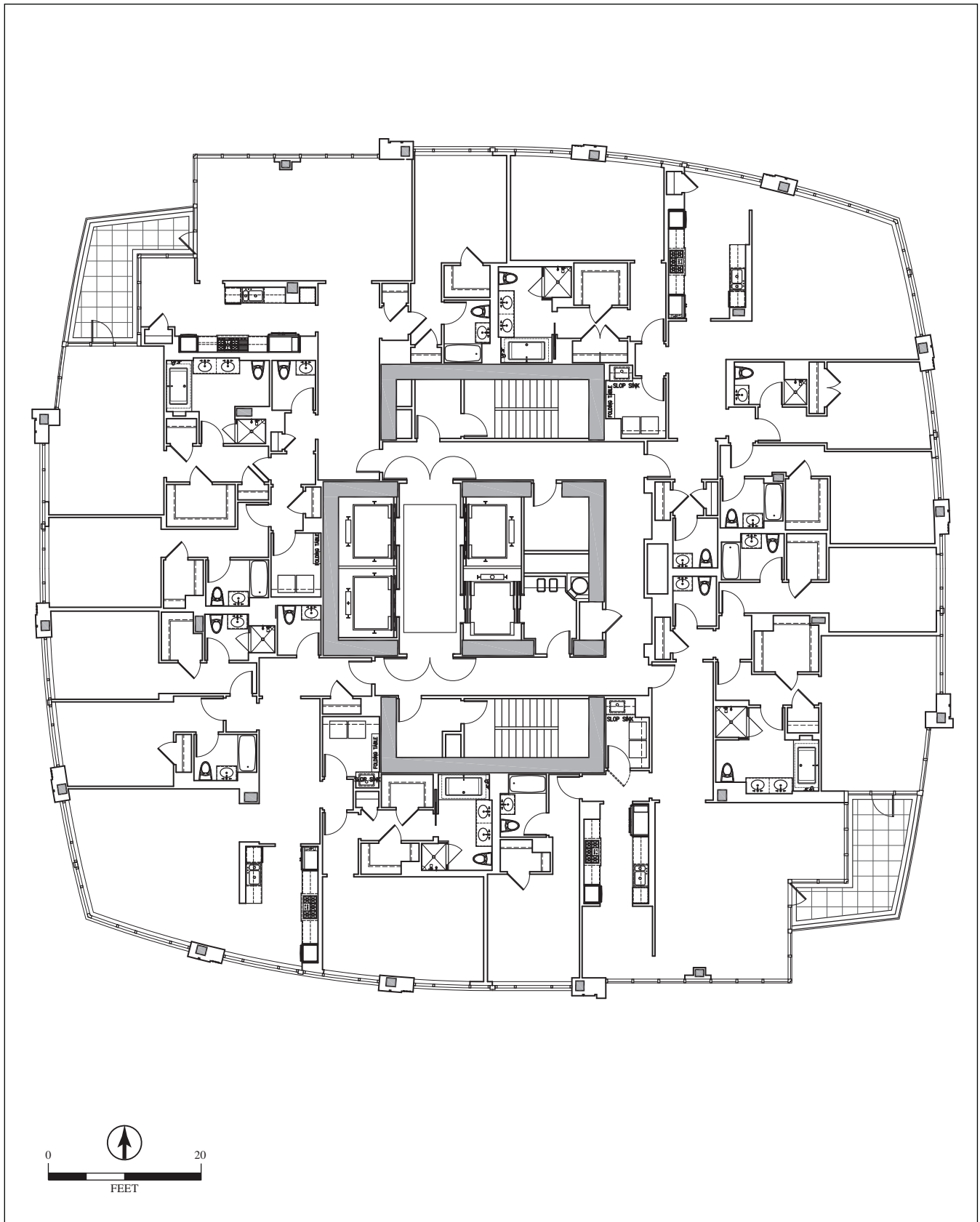


SOURCES: SLCE Architects / MWA Architects

1333 GOUGH STREET/1481 POST STREET

2005.0679E

**FIGURE 2.5: PROPOSED REPRESENTATIVE 3RD FLOOR
THROUGH 29TH FLOOR TOWER PLAN**

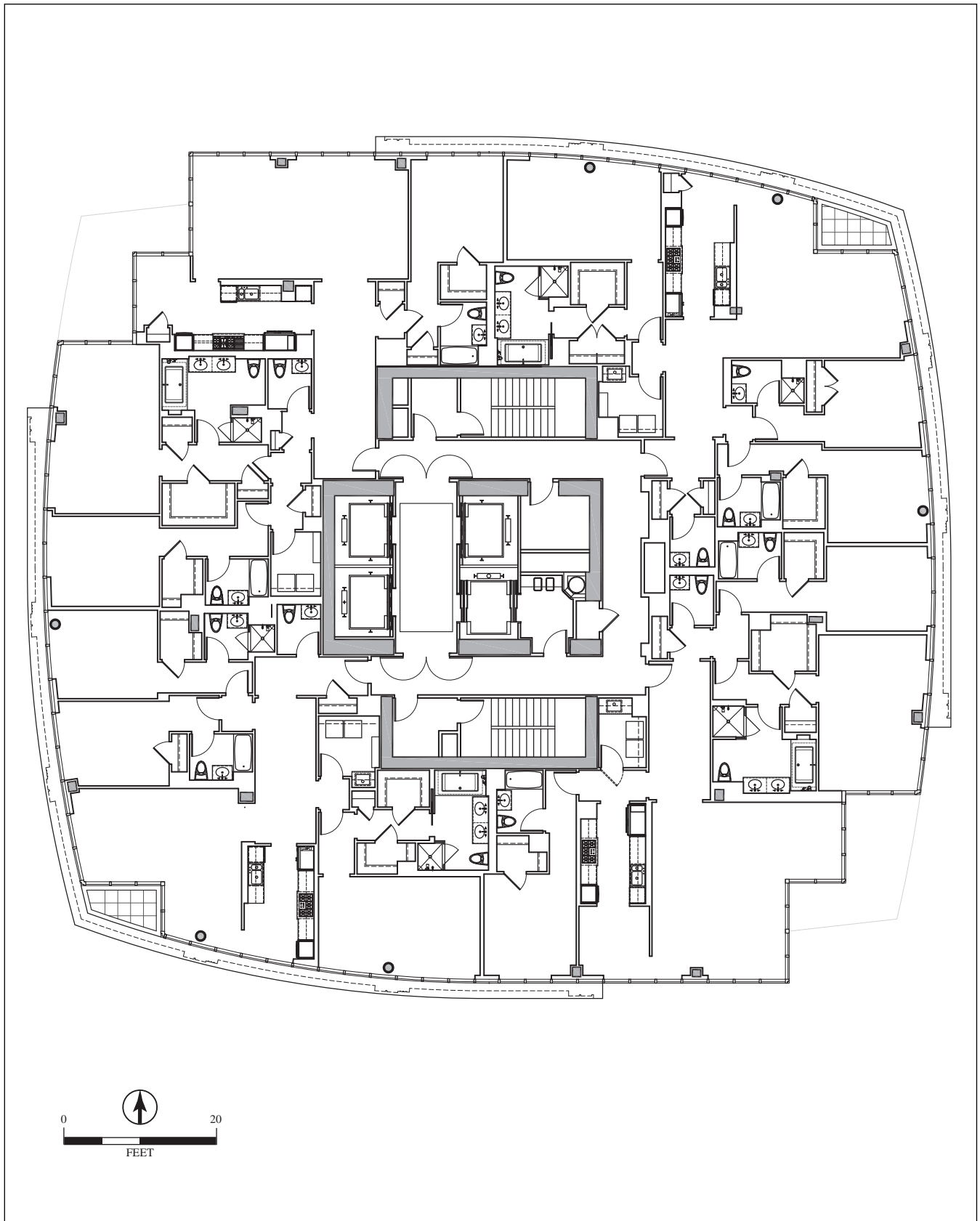


SOURCES: SLCE Architects / MWA Architects

1333 GOUGH STREET/1481 POST STREET

2005.0679E

**FIGURE 2.6: PROPOSED REPRESENTATIVE 30TH FLOOR
THROUGH 33RD FLOOR TOWER PLAN**

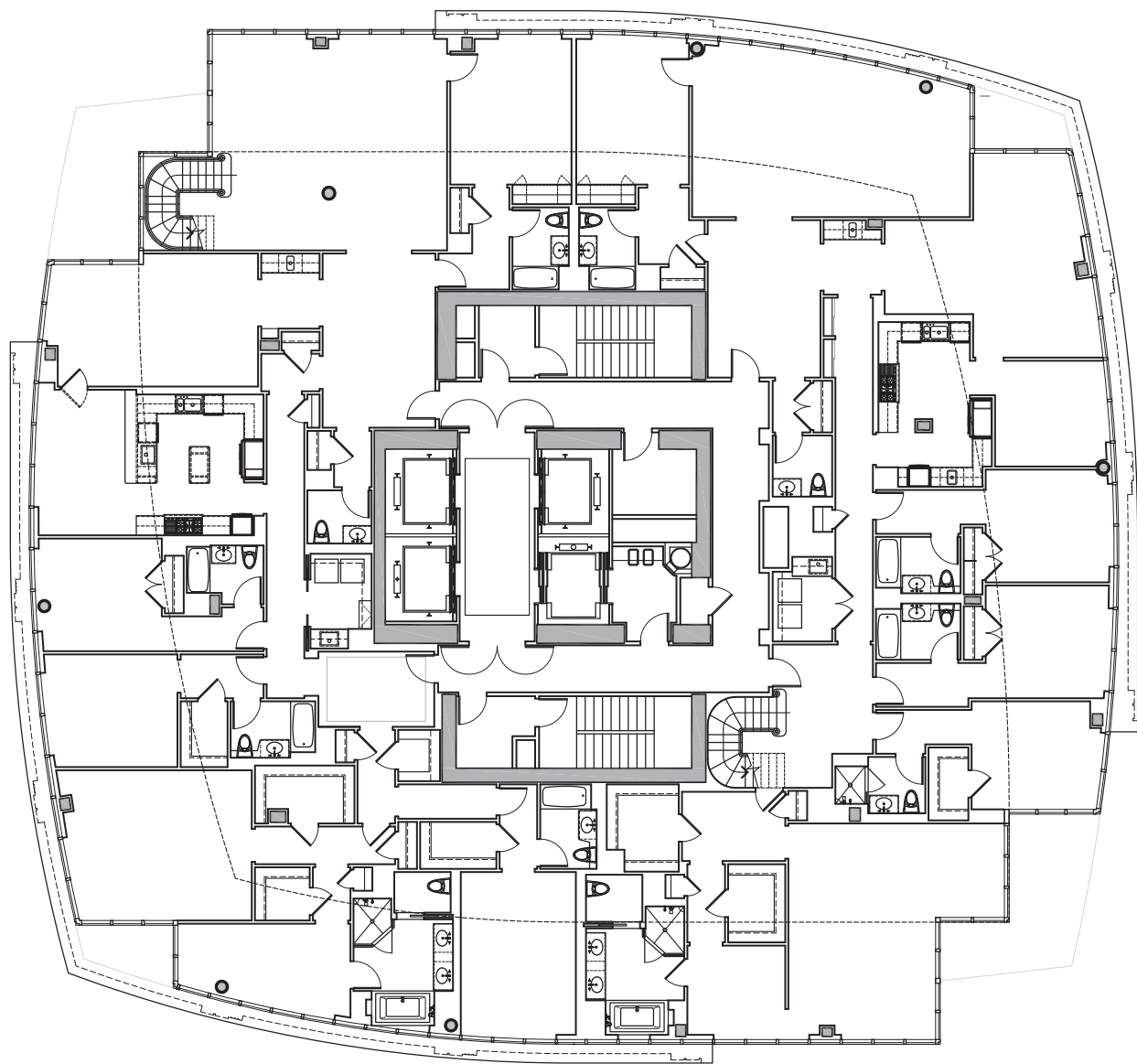


SOURCES: SLCE Architects / MWA Architects

1333 GOUGH STREET/1481 POST STREET

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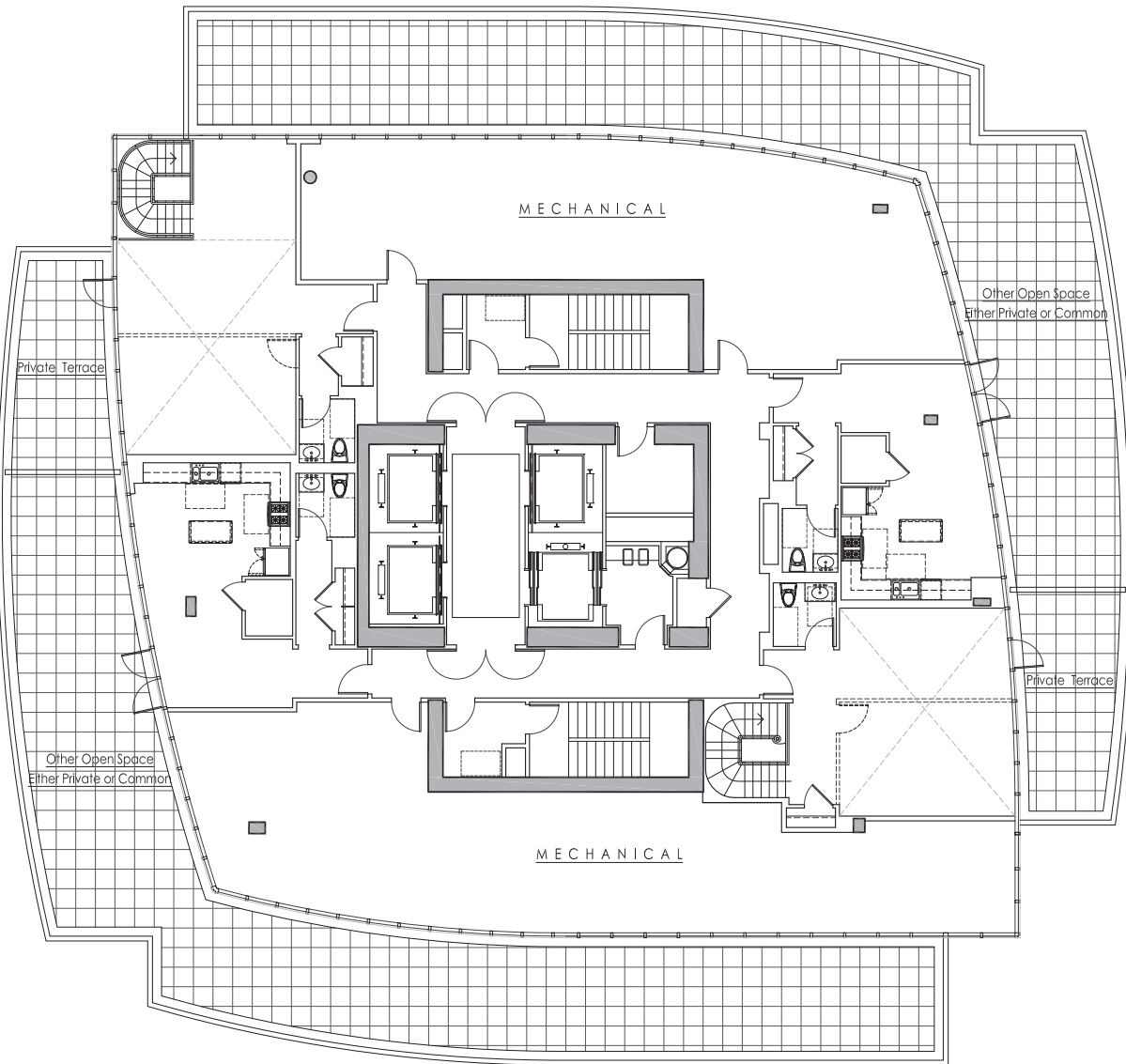
**FIGURE 2.7: PROPOSED REPRESENTATIVE 34TH FLOOR
THROUGH 35TH FLOOR TOWER PLAN**



SOURCES: SLCE Architects / MWA Architects

1333 GOUGH STREET/1481 POST STREET
2005.0679E

**FIGURE 2.8: PROPOSED REPRESENTATIVE
36TH FLOOR TOWER PLAN**



SOURCES: SLCE Architects / MWA Architects

1333 GOUGH STREET/1481 POST STREET

2005.0679E

**FIGURE 2.9: PROPOSED MECHANICAL
AND PENTHOUSE PLAN**

Residential Open Space

Private open space for two of the 262 proposed residential units within the 1481 Post Street building would be provided in two private terraces at the 30th floor (totaling 314 sq. ft.) (see **Figure 2.6**). The remaining 260 units within the proposed 1481 Post Street building would be served by new common open space (totaling 12,637 sq. ft.) that would be provided as follows: a proposed garden (443 sq. ft.) at the southwest corner of the project site, accessible through the proposed fitness amenity at the ground floor (see **Figure 2.3**); a proposed terrace (1,018 sq. ft.) atop the proposed café along Post Street at the northwest corner of the project site, accessible through amenity space at the second floor (see **Figure 2.4**); and a proposed terrace (11,196 sq. ft.) built atop the podium containing the proposed 1481 Post Street building's garage ramp, the proposed loading area, and the proposed new pool addition to 1333 Gough Street. Additional private open space, or a combination of private and common open space (to be determined), would be provided as terraces at the penthouse level (see **Figure 2.9**).

Café

The new building at 1481 Post Street would include a 2,230-gsf retail space for a café along Post Street at the northwest corner of the project site. The main entrance to the proposed café would face Post Street.

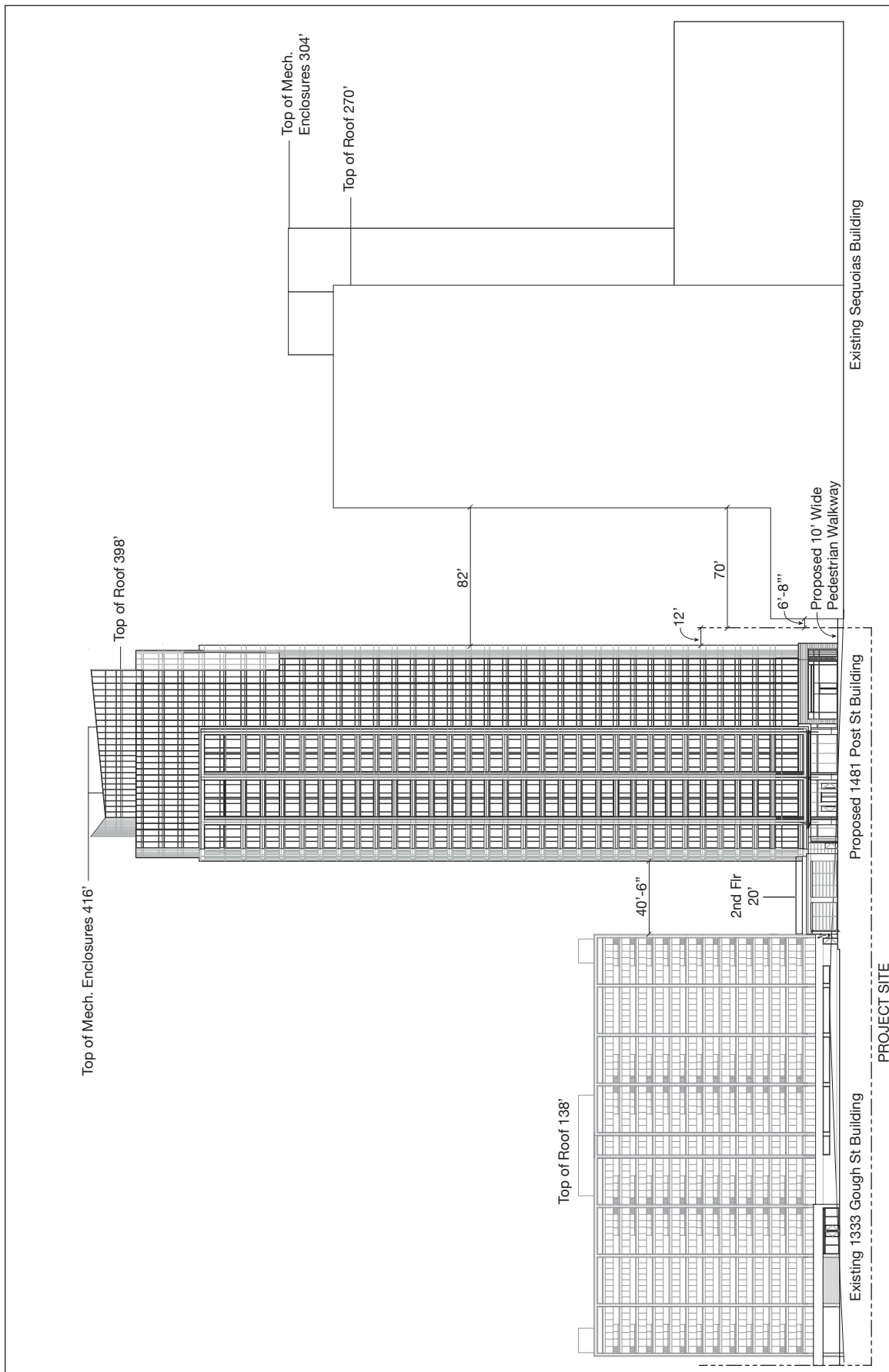
PROPOSED 1481 POST STREET BUILDING FORM AND DESIGN

The proposed new 36-story 1481 Post Street building would consist of a ground-floor podium element, surmounted by a vertical tower element rising to 398 feet at the roof level and to a total height of 416 feet including mechanical equipment, screening, and architectural features. (See **Figure 2.10: Proposed North (Post Street) Elevation**; **Figure 2.11: Proposed East and West Elevations**; and **Figure 2.12: Proposed South (Geary Boulevard) Elevation**.)

The proposed 1481 Post Street building would be contemporary in architectural vocabulary and would include contrasting cladding systems, glazed curtain walls with metal mullions, and masonry-clad piers and spandrels.

Podium

The 20-foot-tall ground floor would be set back about 20 feet from the Post Street sidewalk at its closest point (the café) and about 10 feet from the Geary Boulevard sidewalk. The proposed café at the northwest corner of the project site would project northward toward Post Street, set back about 20 feet from the Post Street sidewalk.

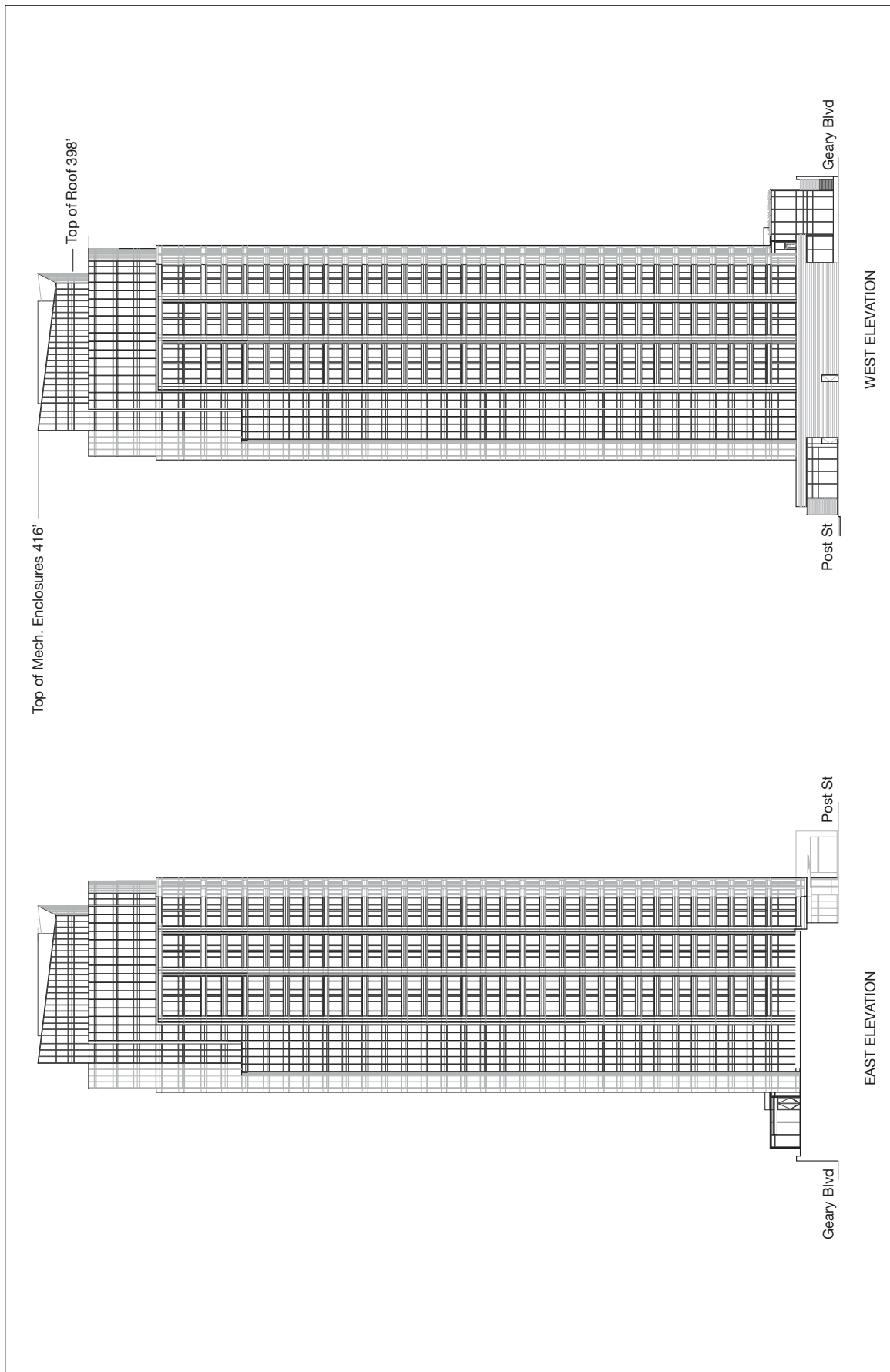


SOURCES: SLCE Architects / MWA Architects

1333 GOUGH STREET/1481 POST STREET

2005.0679E

FIGURE 2.10: PROPOSED NORTH (POST STREET) ELEVATION

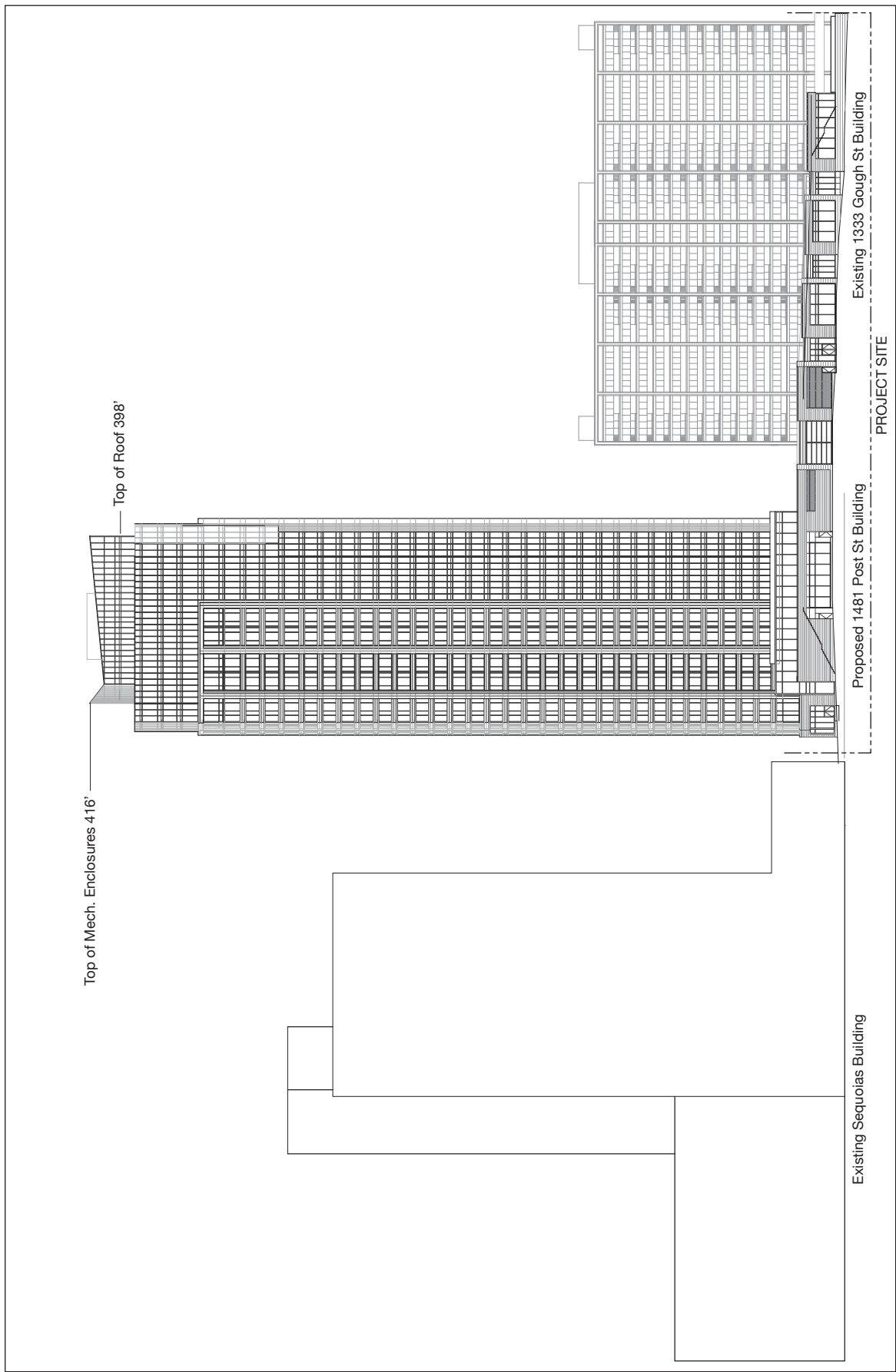


SOURCES: SLCE Architects / MWA Architects

1333 GOUGH STREET/1481 POST STREET

2005.0679E

FIGURE 2.11: PROPOSED EAST AND WEST ELEVATION



SOURCES: SLCE Architects / MWA Architects

1333 GOUGH STREET/1481 POST STREET

2005.0679E

FIGURE 2.12: PROPOSED SOUTH (GEARY BOULEVARD) ELEVATION

Along its west façade, the ground-floor podium would bow outward in plan. The podium would be set back a minimum of 10 feet from the west property line at the midpoint of the podium. The proposed podium would be separated by about 16 feet, 8 inches from the low-rise portion of The Sequoias building at that building's nearest point. The setback from the property line would gradually widen to the north and to the south along the arc of the podium façade to about 15 feet at the north and south ends of the podium. Within the west setback, a ground-level, publicly accessible pedestrian walkway would be constructed to provide a midblock passage between Post Street and Geary Boulevard. The pedestrian walkway would be gated at both ends and would be open to the public during daylight hours and closed at night.

Along Geary Boulevard, the ground floor of the proposed 1481 Post Street building would include extensive glazing along its frontage, and would be separated from the sidewalk by a 10-foot-wide landscaped strip. The one-story street frontage of the proposed building's base along Geary Boulevard would extend eastward with the proposed covered and enclosed loading area.

Tower

Above the podium, the proposed 1481 Post Street building tower shaft would be set back from Post Street by about 40 feet, from Geary Boulevard by about 46 feet, and from 1333 Gough Street on the project site by about 41 feet. The tower shaft would be set back by about 12 feet from the west property line shared with The Sequoias (separated by about 82 feet from the high-rise tower of The Sequoias).

The proposed project's tower shaft would rise straight upward for most of its height. In plan, the building shaft would be nearly as wide as it is long (measuring about 110 feet along its north-south axis and about 118 feet along its east-west axis). The outer walls of the tower shaft would be bowed outward in a broad arc. At the northwest and southeast corners, the tower's volume would be sculpted to create vertical articulation. Additional upper-floor setbacks beginning at the 30th floor would provide further articulation at the building top.

PROPOSED MODIFICATIONS TO 1333 GOUGH STREET

Lobby

The existing lobby entrance of 1333 Gough Street would be relocated from its current east-facing location under the elevated east end of the building slab to the north side of the building to face Post Street. The existing lobby interior would also be reconfigured and remodeled. Primary pedestrian access to the reconfigured 1333 Gough Street lobby would be from Post Street. Pedestrian access to the fitness center for non-resident members would be from Geary Boulevard.

Fitness Center Renovation and Pool Addition

The proposed project includes renovation of the existing fitness center at the ground floor of 1333 Gough Street and reconfiguration of the facility to integrate a new indoor swimming pool addition. The proposed new ground-floor pool addition (8,000 gsf) would be constructed immediately to the south of 1333 Gough Street. The proposed pool addition would front along Geary Boulevard and would be set back 10 feet from the Geary Boulevard sidewalk (see **Figure 2.3** on p. 2.10). Member residents of 1333 Gough Street could continue to access the fitness center through the reconfigured building lobby. Non-resident members and visitors would enter through a doorway to the pool addition along Geary Boulevard. The proposed pool addition would open onto a proposed grade-level, fenced garden open space at the southeast corner of the project site and would be open to fitness center members. The existing tennis courts that would be demolished under the proposed project would not be replaced.

The fitness center would continue to be used by member residents of 1333 Gough Street and would continue to be open to the public for membership. The project sponsor anticipates that club members would continue to consist primarily of neighborhood residents. The project sponsor estimates that the total membership of the fitness center would increase from about 200 existing members to about 400 members after completion of the proposed fitness center upgrades. As of 2013, the fitness center is staffed with about 11 employees, and the project sponsor does not anticipate the proposed fitness center upgrades would require changes to its staffing levels.² There are also a number of independent contractors who teach classes or provide personal training on a limited basis, and whose composition and hours may change with increased membership.

1333 Gough Street Residential Open Space

Private Open Space

The existing private balconies for 144 units on the 3rd through 14th floors would remain in place. Of the existing 13 private open space decks at the 2nd floor, the 4 easternmost decks would remain

² According to the project sponsor, operation of the fitness center requires a fixed level of employees on payroll that is independent of the number of members (e.g., reception desk, operations manager, and fitness director). The existing fitness center facility is underutilized, particularly since the permanent closure of the pool in 2010. The current level of employees would support the anticipated increase in membership after the proposed facility upgrades are completed. Additionally, independent contractor tennis instructors would no longer be needed with the elimination of the tennis courts, thereby offsetting the anticipated need for new independent contractor instructors and trainers to serve the anticipated growth in membership. Turnstone Consulting, Memorandum: 2/19/2013 Communication with Eric Grossberg, Managing Director, ADCO, February 19, 2013. This document is available for review in Case File No. 2005.0679E at the San Francisco Planning Department, 1650 Mission Street, Suite 400.

in place and 9 decks would be demolished with demolition of the existing parking structure on which they sit. New private 2nd floor decks would replace four of the nine demolished 2nd floor decks along the south side of the 1333 Gough Street building atop the proposed fitness center pool addition. The five 2nd floor decks along the north side of the building, demolished under the proposed project, would not be reconstructed under the proposed project. Open space for these five units would be provided in the form of common open space, discussed below.

Common Open Space

The five 2nd floor units left without private open space under the proposed project, together with the 12 units that currently do not have balconies (one on each of the 3rd through 14th floors) would be served by proposed new common open space in the form of a fenced outdoor garden (1,011 sq. ft.) at ground level along Gough Street near the southeast corner of the project site adjacent to, and north of, the proposed fitness center garden (see **Figure 2.3** on p. 2.10). The 1333 Gough Street garden would be accessible through the lobby of 1333 Gough Street.

Ground Floor, North Windows

A band of new windows would be added to the north façade of the building's ground floor, which would be newly exposed by the proposed demolition of the existing parking structure to the north.

Post Street Garden

An approximately 9,500-sq.-ft. garden would be constructed as part of the proposed project along Post Street, in the area directly to the north of the 1333 Gough Street building that would be made available with the proposed demolition of the existing parking garage. The proposed garden would be for use by residents of the 1333 Gough Street building and the proposed 1481 Post Street building. The garden would be fenced and would provide seating and tables, plantings, a water feature, and landscape features intended to buffer wind.

PROPOSED SITE ACCESS, PARKING AND LOADING

Vehicular Access

Passenger vehicle access to the 1481 Post Street building (western) portion of the project site would be from a proposed 20-foot-wide, one-way curb cut entrance along Post Street near the northwest corner of the site. Vehicles could proceed to the passenger drop-off at the proposed 1481 Post Street building's lobby entrance or down a two-way ramp to the parking garage below. Vehicles would exit the site through a proposed 24-foot-wide, one-way curb cut exit along Post Street located about 58 feet to the east of the entrance curb cut.

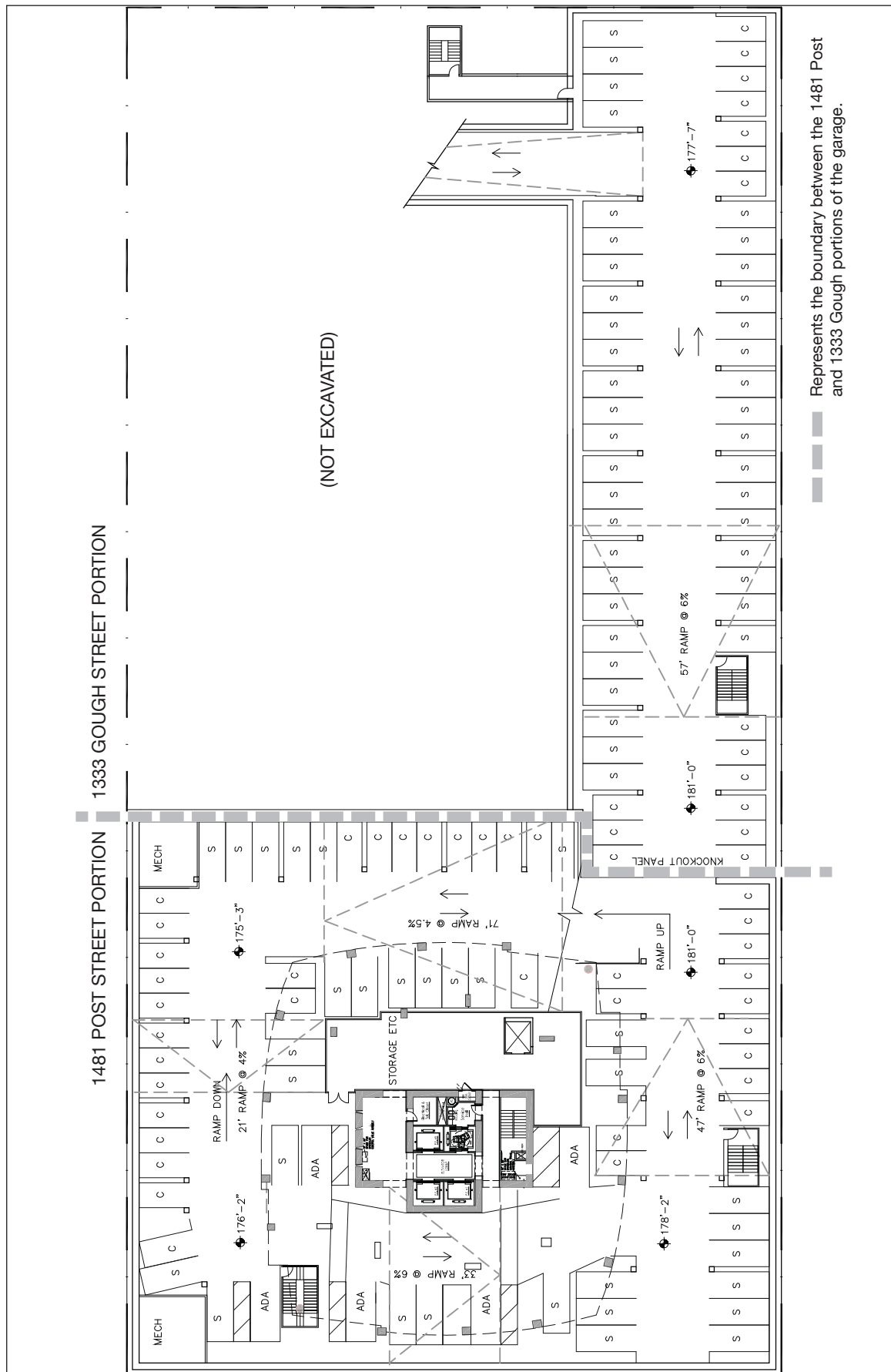
Passenger vehicle access to the 1333 Gough Street (eastern) portion of the project site would be from the northeast corner of the project site from a two-way, 24-foot-wide curb cut entrance/exit along Gough Street (reduced from the existing 27-foot-wide curb cut at this location), as well as a proposed new two-way, 24-foot-wide curb cut entrance/exit along Post Street. From these entrances, vehicles could proceed to a passenger drop-off area at the building's new Post Street lobby entrance or down a two-way ramp to the proposed parking garage below. The two existing curb cuts at the southeast corner of the project site (28 feet wide along Gough Street and 20 feet wide along Geary Boulevard) would be eliminated.

Proposed Parking Garage

The proposed subsurface parking garage (about 180,000 gsf in total) would include a total of 442 independently accessible parking spaces and would consist of two separate portions. One portion would contain replacement parking for each of the existing 1333 Gough Street building spaces that would be demolished under the proposed project (169 residential spaces and 7 visitor spaces) and would also include 4 new carshare spaces accessible to the public. The other portion would contain 262 spaces for residents of the proposed 1481 Post Street building. (See **Figure 2.13: Proposed Basement Level 1 Parking Plan**; **Figure 2.14: Proposed Basement Level 2 Parking Plan**; and **Figure 2.15: Proposed Basement Levels 3 and 4 Parking Plan**. The boundary between the 1333 Gough Street portion of the garage and the 1481 Post Street building portion of the garage is shown in these figures as a bold, dashed, gray line.) Access between the proposed 1481 Post Street portion of the garage and the 1333 Gough Street portion would be limited, and the two areas of the garage would be separated by gates and barriers.

The two-level 1333 Gough Street portion of the garage would generally occupy the eastern portion of the project site (except at basement level 1, where parking for 1333 Gough Street would occupy the southwestern portion of the project site), and would consist of 169 residential spaces and 7 visitor spaces to replace the existing parking spaces that would be demolished. The 1333 Gough Street portion of the proposed parking garage would also include four carshare spaces for use by residents of 1481 Post and 1333 Gough and the public. The parking spaces for 1333 Gough Street and the carshare spaces would be accessed from the existing two-way curb cut entrance/exit along Gough Street, as well as the proposed two-way curb cut entrance/exit along Post Street. The existing driveway running north-south beneath the raised east end of the 1333 Gough Street building (now used as a passenger drop-off and porte-cochere) would be eliminated. The area would be excavated to become a two-way ramp leading down to basement level 1.

At basement level 1, the seven visitor spaces and the four carshare spaces would be located at the southeast corner of the parking garage. Visitor and carshare vehicles would proceed down the



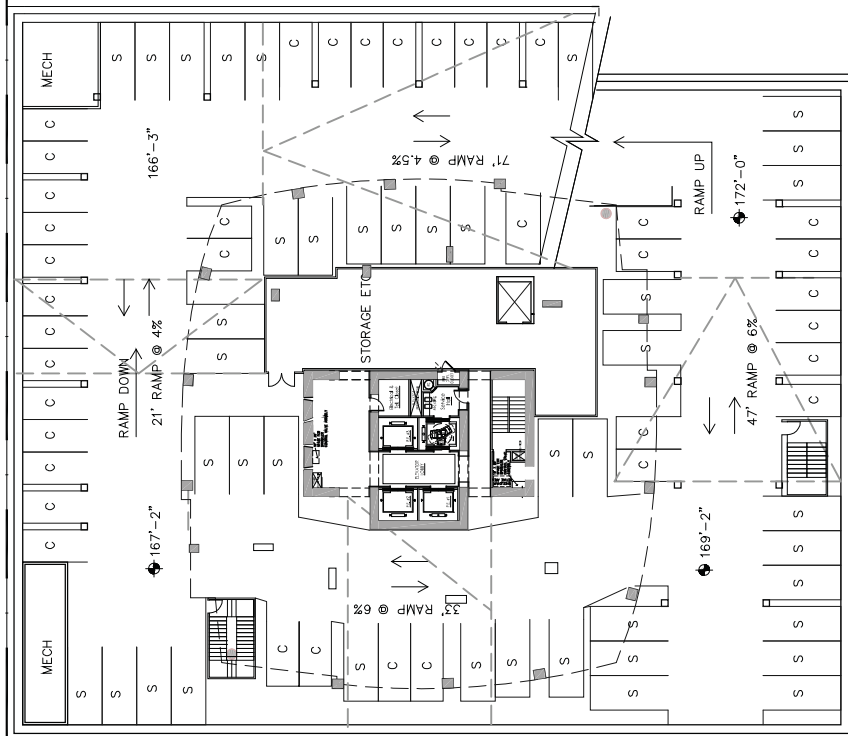
SOURCES: SLCE Architects / MWA Architects

1333 GOUGH STREET/1481 POST STREET

2005.0679E

FIGURE 2.14: PROPOSED BASEMENT LEVEL 2 PARKING PLAN

1481 POST STREET PORTION



SOURCES: SLCE Architects / MWA Architects

1333 GOUGH STREET/1481 POST STREET

2005.0679E

FIGURE 2.15: PROPOSED BASEMENT LEVELS 3 AND 4 PARKING PLAN

ramp and would reach the carshare and visitor parking area before encountering the gate to 1333 Gough Street resident parking. Pedestrians could access these carshare and visitor spaces via stairs from the Gough Street sidewalk. 1333 Gough Street resident vehicles would continue through the gate to access the resident parking spaces for 1333 Gough Street. Resident vehicles could proceed down to basement level 2 with a series of right turns. Vehicles would exit the 1333 Gough Street portion of the garage by driving up the same ramp to exit the site onto Post Street or Gough Street.

The four-level 1481 Post Street building portion of the garage would occupy the western portion of the garage in four levels, and would provide 262 residential spaces. It would be accessed from the proposed one-way curb cut entrance along Post Street. Vehicles would proceed southward down a two-way ramp to the parking garage below. At basement level 1, gates would prevent residents of 1333 Gough Street from entering the proposed 1481 Post Street building portion of the garage. However, residents of the proposed 1481 Post Street building would be allowed limited access through gates to use the parking circulation aisle at the southwest portion of basement level 1 (with parking reserved for the residents of 1333 Gough Street) to allow residents of the proposed 1481 Post Street building to access the lower parking spaces allocated to 1481 Post Street. Vehicles would exit the garage by driving up the same ramp to exit the site from the proposed one-way curb cut exit onto Post Street.

As under existing conditions, the proposed project would not provide parking for the fitness center (as reconfigured under the proposed project and described above). Likewise, the proposed project would not provide parking for the new café use.

Loading

The proposed project would include two off-street freight loading spaces (with dimensions of 12 feet wide, 35 feet long, and 14-foot vertical clearance) that would be located off of Geary Boulevard between the proposed 1481 Post Street building and the proposed 1333 Gough Street pool addition (see **Figure 2.3** on p. 2.10). Delivery and service vehicles would enter the project site from a proposed 37-foot-wide, one-way curb cut entrance along Geary Boulevard and back into one of the loading spaces that flank the loading area entrance (covered by a deck above). Vehicles would exit the loading area by proceeding northward through the project site on an interior driveway between the proposed 1481 Post Street building and 1333 Gough Street to exit onto Post Street from the proposed one-way curb cut exit. The freight loading area would serve both the existing and proposed buildings.

The project sponsor would request SFMTA approval to designate the curb parking lane on Post Street, between the proposed 1481 Post Street inbound and outbound driveways (approximately

60 feet), as a commercial loading zone (i.e., yellow zone) to serve the 1481 Post Street building and be used for small trucks and service delivery vehicles.

Bicycle Parking

The proposed project would include 263 Class 1 bicycle parking spaces³ for residents of the proposed 1481 Post Street building in a secure room within the portion of the proposed subsurface parking structure allocated to serve the proposed 1481 Post Street building at basement level 1 (see **Figure 2.13** on p. 2.25). The number of proposed Class 1 bicycle parking spaces exceeds the requirements of the Planning Code. The bicycle parking spaces would be accessible by a shuttle elevator from the lobby. In addition, one Class 1 space would be provided at the north entrance of the midblock pedestrian walkway, 14 Class 2 spaces would be provided in bicycle racks located on the Post Street sidewalk in front of the garden area, and four Class 2 spaces would be provided in bicycle racks on the Post Street sidewalk in front of the café/restaurant.

The proposed project would also include 30 Class 1 bicycle parking spaces to be made available to residents of the existing 1333 Gough Street building as an amenity. These bicycle spaces would be located at the ground level within the eastern end of that building. This currently covered and unenclosed area would be enclosed to house the Class 1 bicycle spaces.

Sidewalk Improvements

The proposed project includes sidewalk widening along Post Street and Geary Boulevard and construction of sidewalk bulbs along the Post Street, Gough Street, and Geary Boulevard perimeters of the project site. Corner bulbs would be provided at the northeast corner of the project site (the southwest corner of the Post Street/Gough Street intersection) and at the southeast corner of the project site (the northwest corner of the Gough Street/Geary Boulevard intersection). Three midblock bulbs would be provided along Post Street (at the northwest corner of the project site, immediately east of the proposed 1481 Post Street exit curb cut, and immediately west of the proposed entrance/exit curb cut for 1333 Gough Street). One midblock bulb would be provided along Gough Street (immediately south of the proposed entrance/exit curb cut for 1333 Gough Street). One midblock bulb would be provided along Geary Boulevard (at the southwest corner of the project site). The bulb would extend 7 feet into existing on-street parking spaces that front along the project site, permanently reducing the existing number of on-street parking spaces (described below).

³ Class 1 Bicycle parking spaces are defined in Planning Code § 155.1(a) as “Facilities which protect the entire bicycle, its components and accessories against theft and inclement weather, including wind-driven rain.”

On-Street Parking

The proposed new curb cuts, the proposed elimination of existing curb cuts, the proposed on-street loading space, and the proposed bulbs would call for reconfiguration of the on-street parking spaces fronting the project site. The number of existing on-street parking spaces fronting the project site (39 total existing spaces) would be permanently reduced to 18 spaces under the proposed project. Along Post Street, the existing 20 spaces would be permanently reduced to four spaces under proposed conditions. Along Gough Street, the number of spaces would remain at four spaces under both existing and proposed conditions (the existing parking space eliminated by the proposed bulb would be offset by a new space gained by elimination of the existing curb cut along Gough Street at the southeast corner of the project site). Along Geary Boulevard, the existing 15 spaces would be permanently reduced to 10 spaces under proposed conditions (the elimination of the existing curb cut along Geary Boulevard at the southeast corner of the project site does not create an opportunity for a new on-street parking space due to the existing nearby Muni bus stop).

PROJECT VARIANTS

In addition to the specific characteristics of the proposed project described in this chapter, Planning Department staff have included three optional site plan schemes for study in this EIR that reflect design variations to the site plan's public realm improvements. Each variant is analyzed at a sufficient level of detail so that it would be available for selection by the decision-makers and/or project sponsor as part of an approval action.

Variant A – Sidewalk Widening Project Variant

Variant A is an optional scheme that includes widening of the sidewalks at the street perimeter of the project site. (See **Figure 2.16: Variant A – Sidewalk Widening Project Variant.**) Under this variant to the proposed project, the Post Street, Gough Street, and Geary Boulevard sidewalks would be widened along their entire lengths fronting the project site. The Post Street sidewalk would be widened from 10 feet to 19 feet, 4 inches. The Gough Street sidewalk would be widened from 10 feet to 18 feet, 9 inches. The Geary Boulevard sidewalk would be widened from 10 feet to 15 feet. The sidewalk widening under this variant would permanently eliminate all 39 existing parking spaces along Post Street, Gough Street, and Geary Boulevard that front along the project site.

Under this variant to the proposed project, vehicles would enter the 1481 Post Street portion of the project site through a 12-foot-wide curb cut entrance along Post Street, compared to a 20-foot-wide entrance driveway for the 1481 Post Street building under the proposed project (see **Figure 2.3** on p. 2.10).

In all other respects, this variant would be the same as the proposed project.

Variant B – 1481 Post Street Curb Cut and Sidewalk Widening Project Variant

Variant B is an optional scheme that includes reconfiguration of the vehicular access to the 1481 Post Street portion of the project site and widening of the sidewalks at the street perimeter of the project site. (See **Figure 2.17: Variant B – 1481 Post Street Curb Cut and Sidewalk Widening Project Variant.**) Under this variant to the proposed project, vehicles would enter and exit the 1481 Post Street portion of the project site through a single, two-way, 30-foot-wide curb cut entrance along Post Street, as opposed to separate entrance and exit driveways providing access to the 1481 Post Street portion of the project site under the proposed project (see **Figure 2.3** on p. 2.10).

As with Variant A above, under Variant B, the Post Street, Gough Street, and Geary Boulevard sidewalks would be widened along their entire lengths fronting the project site. The Post Street sidewalk would be widened from 10 feet to 19 feet, 4 inches. The Gough Street sidewalk would be widened from 10 feet to 18 feet, 9 inches. The Geary Boulevard sidewalk would be widened from 10 feet to 15 feet. The sidewalk widening under this variant would permanently eliminate all 39 existing parking spaces along Post Street, Gough Street, and Geary Boulevard that front along the project site.

In all other respects, this variant would be the same as the proposed project.

Variant C – 1333 Gough Street Curb Cut and Sidewalk Widening Project Variant

Variant C is an optional scheme that includes reconfiguration of the vehicular access to the 1333 Gough Street portion of the project site and widening of the sidewalks at the street perimeter of the project site. (See **Figure 2.18: Variant C – 1333 Gough Street Curb Cut and Sidewalk Widening Project Variant.**) Under this variant to the proposed project, the proposed two-way, 24-foot-wide curb cut entrance/exit along Post Street at the northeast corner of the project site would not be constructed. Instead, vehicles would enter and exit the 1333 Gough Street portion of the project site through the existing, two-way, 27-foot-wide curb cut entrance/exit along Gough Street at the northeast corner of the project site (see **Figure 2.3** on p. 2.10).

As with Variants A and B above, under Variant C, the Post Street, Gough Street, and Geary Boulevard sidewalks would be widened along their entire lengths fronting the project site. The Post Street sidewalk would be widened from 10 feet to 19 feet, 4 inches. The Gough Street sidewalk would be widened from 10 feet to 18 feet, 9 inches. The Geary Boulevard sidewalk would be widened from 10 feet to 15 feet. The sidewalk widening under this variant would permanently eliminate all 39 existing parking spaces along Post Street, Gough Street, and Geary Boulevard that front along the project site.

In all other respects, this variant would be the same as the proposed project.

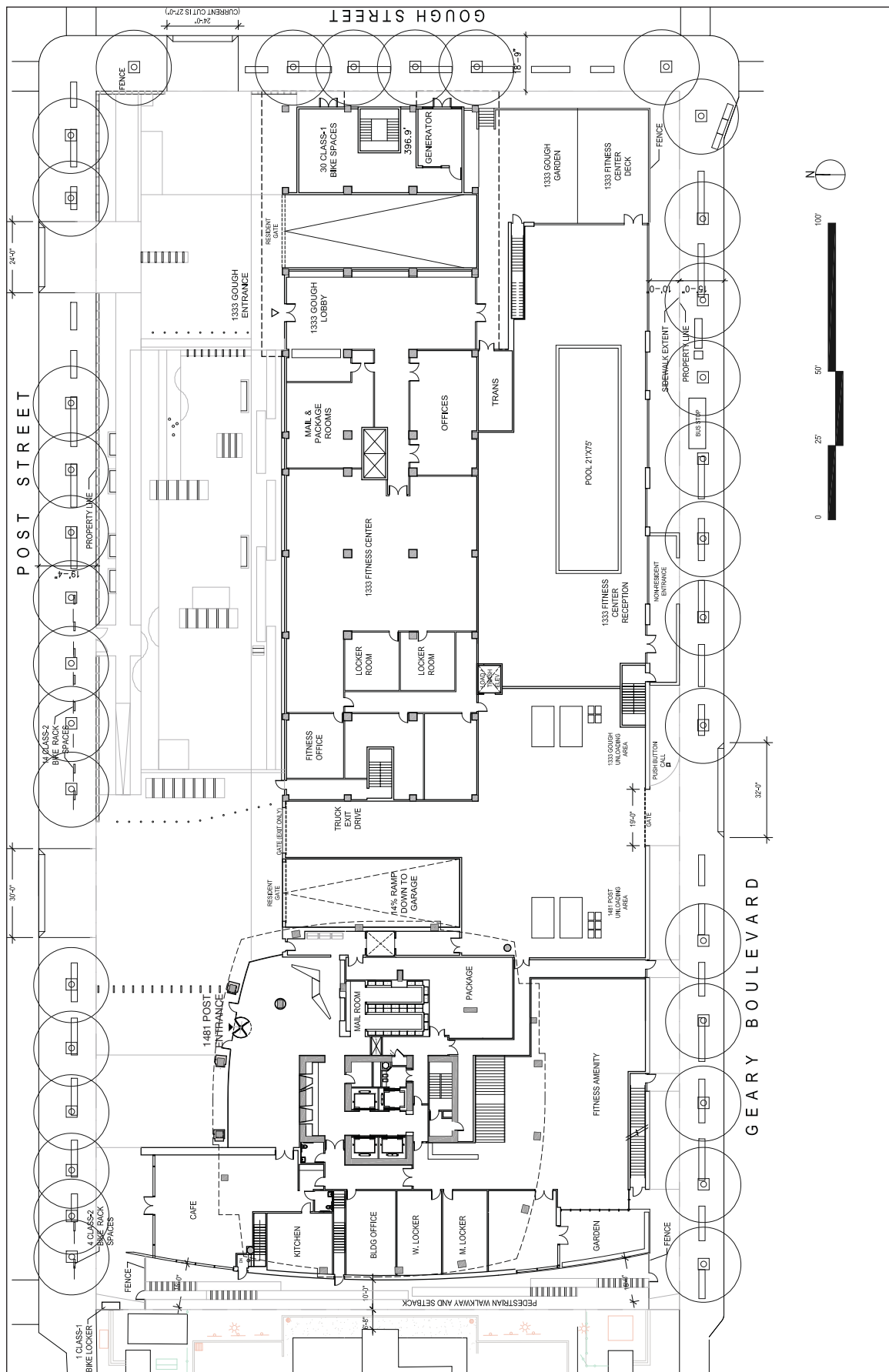
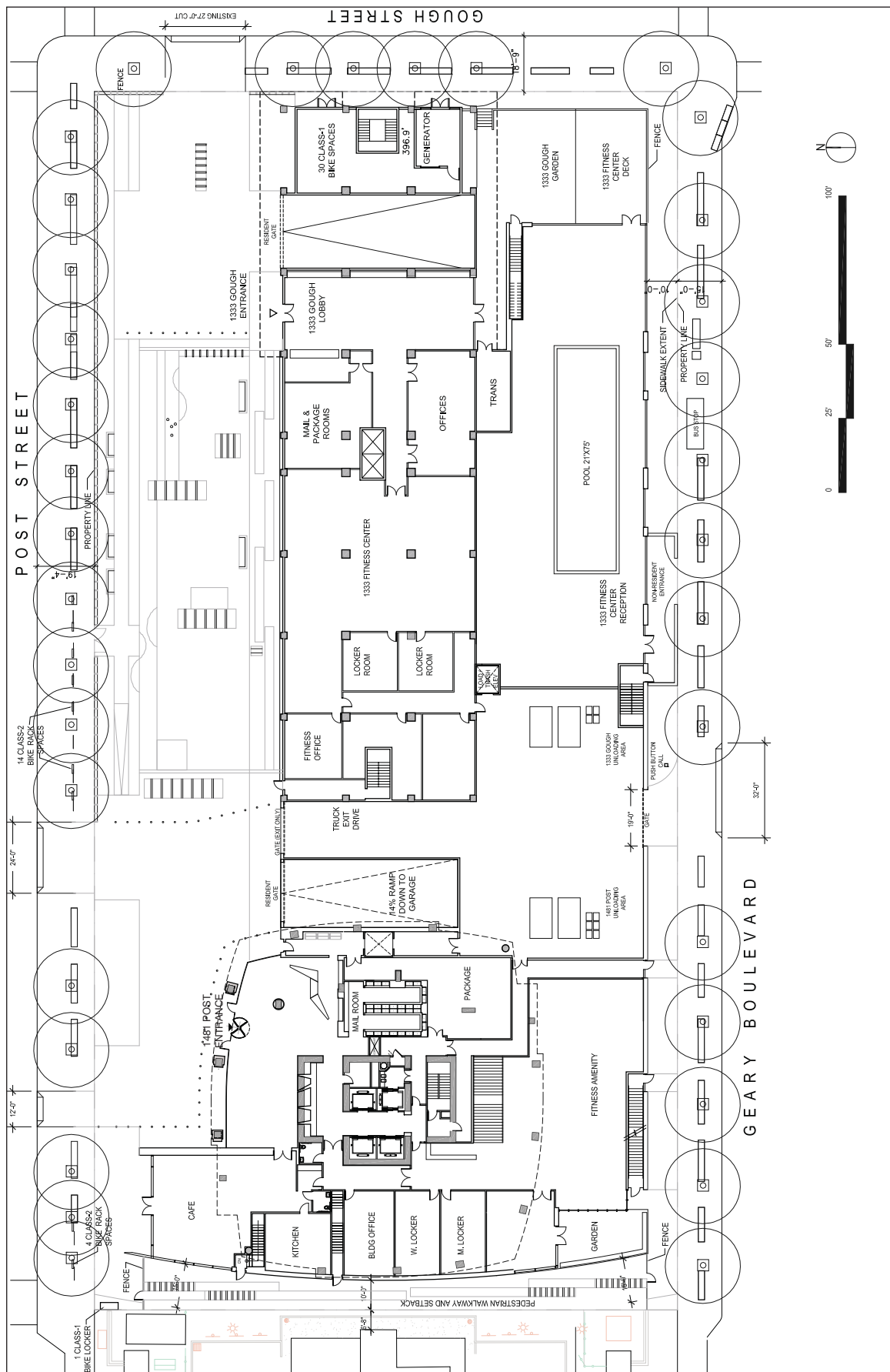


FIGURE 2.17: VARIANT B - 1481 POST STREET CURB CUT AND SIDEWALK WIDENING PROJECT VARIANT

SOURCES: SLCE Architects / MWA Architects

1333 GOUGH STREET/1401 POST STREET

2005.0679E



SOURCES: SLCE Architects / MWA Architects

1333 Gough Street/1481 Post Street

2005.0679E

PHOTOSIMULATIONS OF THE PROPOSED PROJECT⁴

An independent consultant photographed the project site from a range of publicly accessible vantage points around the project site. From these, the Planning Department selected twelve representative views. Computer-generated photosimulations depicting the proposed project were then superimposed on these views. These photosimulations supplement the description of the proposed project above. **Figure 2.19: Photosimulations of Proposed Project, Views A and B**, shows a familiar and much-photographed view of San Francisco from Alamo Square Park (top) and an elevated distant view from Twin Peaks of San Francisco within its regional setting (bottom). **Figure 2.20: Photosimulations of Proposed Project, Views C and D**, shows a distant, framed view along the Octavia Street corridor, taken from Lafayette Park (top) and a mid-range view along Geary Boulevard (bottom). **Figure 2.21: Photosimulations of Proposed Project, Views E and F**, shows a distant view along Octavia Street, looking north toward Cathedral Hill (top) and a mid-range view from the west sidewalk of Gough Street south of Geary Boulevard, looking northwest over St. Mary's Cathedral plaza toward the project site (bottom). **Figure 2.22: Photosimulations of Proposed Project, Views G and H**, shows a distant view along Geary Boulevard (top) and a mid-range view from the intersection of Fillmore Street and O'Farrell Street (bottom). **Figure 2.23: Photosimulations of Proposed Project, View I**, shows a mid-range view from the northwest corner of Post Street and Laguna Street. **Figure 2.24: Photosimulations of Proposed Project, Views J and K**, shows a close-range view from the north side of Post Street at the Octavia midblock pedestrian crossing (top) and a close-range view from the northeast corner of Post Street and Gough Street (bottom). **Figure 2.25: Photosimulations of Proposed Project, View L**, shows a close-range view from the center median of Geary Boulevard.

PROJECT CONSTRUCTION

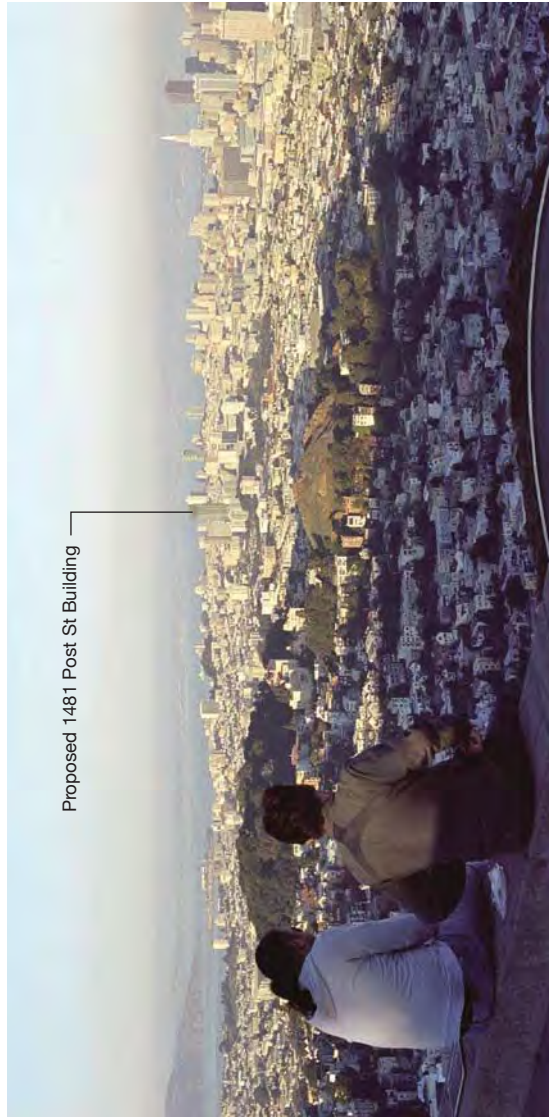
Foundation and Excavation

The proposed 1481 Post Street building would have a mat foundation under its core that would extend to perimeter columns. This mat foundation would extend approximately 7 feet below the lowest parking slab elevation. The proposed construction to the south of 1333 Gough Street would also have a mat foundation. No pile driving is anticipated. The construction below grade would include reinforced concrete walls. The proposed project would have an estimated

⁴ The proposed project is subject to Public Resources Code § 21099(d), which eliminates aesthetics as an impact that can be considered in determining the significance of physical environmental effects under the California Environmental Quality Act for projects meeting certain criteria. Accordingly, this EIR does not contain a separate discussion of the topic of Aesthetics. Photosimulations of the proposed project are provided for informational purposes only. See pp. 4.A.1-4.A.3 for further discussion of Public Resources Code § 21099(d).



View A, From Alamo Square, Looking Northeast



View B, From Twin Peaks, Looking Northeast

SOURCE: Square One Productions

1333 GOUGH STREET/1481 POST STREET

2005.0679E

FIGURE 2.19: PHOTOSIMULATIONS OF PROPOSED PROJECT, VIEWS A AND B



View C, From Lafayette Park, Looking South



View D, Along Geary Boulevard, Looking West

SOURCE: Square One Productions

1333 GOUGH STREET/1481 POST STREET

2005.0679E

**FIGURE 2.20: PHOTOSIMULATIONS OF PROPOSED PROJECT,
VIEWS C AND D**



View E, Along Octavia Street at Haight Street, Looking North



View F, From Gough Street, Looking Northwest

SOURCE: Square One Productions

1333 GOUGH STREET/1481 POST STREET

2005.0679E

**FIGURE 2.21: PHOTOSIMULATIONS OF PROPOSED PROJECT,
VIEWS E AND F**



View G, along Geary Boulevard, Looking East



View H, From O'Farrell Street at Fillmore Street, Looking East

SOURCE: Square One Productions

1333 GOUGH STREET/1481 POST STREET

2005.0679E

**FIGURE 2.22: PHOTOSIMULATIONS OF PROPOSED PROJECT,
VIEWS G AND H**



View I, Along Post Street, Looking Southeast

SOURCE: Square One Productions

1333 GOUGH STREET/1481 POST STREET

2005.0679E

**FIGURE 2.23: PHOTOSIMULATIONS OF PROPOSED PROJECT,
VIEW I**



View J, Across Post Street, Looking Southeast



View K, Along Post Street, Looking Southwest

SOURCE: Square One Productions

1333 GOUGH STREET/1481 POST STREET

2005.0679E

**FIGURE 2.24: PHOTOSIMULATIONS OF PROPOSED PROJECT,
VIEWS J AND K**



View L, From Geary Boulevard, Looking Northeast

SOURCE: Square One Productions

1333 GOUGH STREET/1481 POST STREET

2005.0679E

**FIGURE 2.25: PHOTOSIMULATIONS OF PROPOSED PROJECT,
VIEW L**

3. PLANS AND POLICIES

In accordance with *CEQA Guidelines* §15125(d), this chapter discusses potential conflicts between the proposed project and applicable local, regional, state, and federal plans and policies. Policy conflicts do not, in and of themselves, indicate a significant environmental effect within the meaning of CEQA. To the extent that adverse physical environmental impacts may result from such conflicts, such impacts are analyzed in this EIR in the specific topical sections in **Chapter 4, Environmental Setting, Impacts, and Mitigation**, and in Section E, Evaluation of Environmental Effects, of the Notice of Preparation/Initial Study (NOP/IS) that was published on June 12, 2013 (**Appendix A** of this EIR). The staff reports and approval motions prepared for the decision-makers would 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.

A. CONSISTENCY WITH APPLICABLE PLANS AND POLICIES

The proposed project was reviewed for inconsistencies with the following plans and policies:

- *San Francisco General Plan*
- San Francisco Planning Code
- Accountable Planning Initiative (Planning Code § 101.1)
- *Japantown Cultural Heritage and Economic Sustainability Strategy*
- *Climate Action Plan for San Francisco: Local Actions to Reduce Greenhouse Emissions*
- San Francisco Transit First Policy (City Charter, § 8A.115)
- *San Francisco Bicycle Plan*
- *San Francisco Better Streets Plan*
- *San Francisco Sustainability Plan*
- San Francisco Congestion Management Program
- Regional Water Quality Control Board's *Water Quality Control Plan for the San Francisco Bay Basin*
- Bay Area Air Quality Management District's *Bay Area 2010 Clean Air Plan*
- Metropolitan Transportation Commission's *Transportation 2035 Plan for the San Francisco Bay Area*
- Association of Bay Area Governments' *Projections and Priorities 2009*

Potential inconsistencies with the *San Francisco General Plan*, the San Francisco Planning Code, and the Accountable Planning Initiative are discussed below.

B. SAN FRANCISCO GENERAL PLAN

The *San Francisco General Plan (General Plan)* is the embodiment of the City's vision for the future of San Francisco.¹ It is comprised of a series of ten elements, each of which deals with a particular topic that applies citywide: Air Quality; Arts; Commerce and Industry; Community Facilities; Community Safety; Environmental Protection; Housing; Recreation and Open Space; Transportation; and Urban Design. The *General Plan* also includes area plans, each of which focuses on a particular area of the City. The project site is not covered by a specific area plan.

Development in San Francisco is subject to the *General Plan*, which provides general policies and objectives to guide land use decisions and contains some policies that relate to physical environmental issues. The Planning Department, the Zoning Administrator, the Planning Commission, the Board of Supervisors, and other City decision-makers will evaluate the proposed project for conformance with the objectives and policies of the *General Plan*, and will consider potential conflicts as part of the decision-making process. The consideration of *General Plan* objectives and policies is carried out independent of the environmental review process, as part of the decision to approve, modify, or disapprove a proposed project.

As discussed below, the proposed project would be potentially inconsistent with some of the objectives and policies of the Urban Design Element and the Recreation and Open Space Element that relate to physical environmental effects.

The Urban Design Element addresses the physical character and order of the City and the relationship between people and their environment. Some of the objectives of the Urban Design Element that are applicable to the proposed project include emphasizing the characteristic pattern which gives the City and its neighborhoods an image, a sense of purpose, and a means of orientation; and moderating major new development to complement the City pattern, the resources to be conserved, and the neighborhood environment. The Urban Design Element favors the location of tall buildings at the top of prominent hills such as Cathedral Hill. The proposed project, which would be approximately 398 feet tall (416 feet tall including an 18-foot-tall mechanical penthouse), may potentially conflict with policies of the Urban Design Element including but not limited to:

- Policy 1.3: Recognize that buildings, when seen together, produce a total effect that characterizes the city and its districts.
- Policy 1.6: Make centers of activity more prominent through design of street features and by other means.

¹ San Francisco Planning Department website, http://www.sf-planning.org/ftp/General_Plan/index.htm, accessed March 8, 2013.

- Policy 3.2: Avoid extreme contrasts in color, shape and other characteristics which will cause new buildings to stand out in excess of their public importance.
- Policy 3.5: Relate the height of buildings to important attributes of the city pattern and to the height and character of existing development.

The proposed project would also potentially conflict with Map 4: Urban Design Guidelines for Height of Buildings, and Map 5: Urban Design Guidelines for Bulk of Buildings in the Urban Design Element of the *General Plan*.

The Recreation and Open Space Element establishes objectives and policies that guide the City's decisions related to providing, improving, and expanding recreation and open space facilities for its residents. One objective of the Recreation and Open Space Element that is applicable to the proposed project is Objective 2: Develop and maintain a diversified and balanced citywide system of high-quality public open space. The proposed project, which would be approximately 398 feet tall (416 feet tall including an 18-foot-tall mechanical penthouse), would potentially conflict with the following policy of the Recreation and Open Space Element:

- Policy 2.3: Preserve sunlight in public open spaces.

Physical environmental impacts that could result from the conflicts noted above are discussed in **Section 4.F, Wind and Shadow**. Public Resources Code § 21099 eliminates the analysis of aesthetics in the environmental review for this project under CEQA. The topic of aesthetics may no longer be considered in determining the significance of the proposed project's physical environmental effects under CEQA. Insofar as potential conflicts with the *General Plan* are related to aesthetic issues, they will continue to be considered by the decision-makers as part of actions to approve, modify, or disapprove the proposed project.

C. SAN FRANCISCO PLANNING CODE

The Planning Code, which incorporates by reference the City's Zoning Map, implements the *San Francisco General Plan* and governs permitted uses, density, and configuration of buildings within the City. Permits to construct new buildings (or to alter or demolish existing ones) may not be issued unless (1) a project complies with the Planning Code, (2) allowable exceptions are granted pursuant to provisions of the Planning Code, or (3) amendments to the Planning Code are included as part of the project.

USE DISTRICTS

The project site is in an RM-4 (Residential, Mixed, High Density) District. The proposed project would comply with the following Planning Code requirements applicable to RM-4 Districts: residential use (Planning Code § 209.1); front setback (Planning Code § 132); usable open space (Planning Code § 135); off-street parking (Planning Code § 151); off-street loading (Planning

Code § 152); bicycle parking (Planning Code § 155.2); car sharing (Planning Code § 166); inclusionary housing (Planning Code § 415). The project is located on property subject to a prior approval of a Planned Unit Development. Therefore, approval of the project requires modification of that Planned Unit Development. Section 304 of the Planning Code permits projects processed under a Planned Unit Development to modify certain specified provisions of the Planning Code. The project would modify the following provisions of the Planning Code and thus would differ in these respects from the requirements otherwise applicable to projects in RM-4 Districts not subject to a Planned Unit Development:

- **Rear Yard.** The project would require a modification from Planning Code § 134(a)(1)(C), which requires an open rear yard depth equal to 25 percent of the lot depth but not less than 15 feet, at levels occupied by dwelling units. The property measures 197 feet from north to south. Thus, a minimum rear yard measuring 49 feet from the Geary Boulevard property line is required. An exception is required because 1481 Post would be set back about 46 feet from the Geary Boulevard property line at the first level containing residential units. The existing building at 1333 Gough is set back more than 49 feet from the Geary Boulevard property line at the first floor containing residential units.²
- **Dwelling Unit Exposure.** Pursuant to Planning Code § 140, the required windows of at least one room of each dwelling unit must face on a public street, a public alley at least 25 feet in width, a side yard at least 25 feet in width, a rear yard meeting the requirements of the Planning Code, or an open area that is unobstructed and is no less than 25 feet in every horizontal dimension for the floor at which the dwelling unit in question is located and the floor immediately above it, with an increase of 5 feet in every horizontal dimension for each subsequent floor. The proposed project would include some dwelling units that do not meet the requirement for dwelling unit exposure. The project sponsor is seeking a modification or waiver of the requirement for dwelling unit exposure through the approval of a PUD.
- **Residential Density.** Pursuant to Planning Code § 209.1(l), RM-4 Districts generally permit a residential density of one dwelling unit for every 200 square feet of lot area. Pursuant to Planning Code § 304(d)(4), the maximum residential density in an RM-4 District can be increased from one unit for every 200 square feet of lot area to one unit for every 125 square feet of lot area (minus one unit) through the approval of a PUD. The proposed project would result in the construction of 262 dwelling units. Including the 169 existing dwelling units at 1333 Gough Street, there would be a total of 431 dwelling units on the 80,864-square-foot project site. The resulting residential density of one dwelling unit for every 187 square feet of lot area would require the modification of the existing PUD.

A comprehensive Planning Code analysis will be conducted as part of the entitlement process for the proposed project.

² Pursuant to Planning Code § 304, a Planned Unit Development (PUD) is a special type of authorization that allows the Planning Commission to waive, modify, or grant modifications to certain Planning Code requirements for projects that occupy sites that are at least one-half acre (21,780 square feet) in size.

The proposed project is subject to the requirements for public right-of-way improvements, which are set forth in the *San Francisco Better Streets Plan* and codified in Planning Code § 138.1, Streetscape and Pedestrian Improvements. The proposed project would comply with these regulations by providing the required public right-of-way improvements.

The proposed 1481 Post Street building would be approximately 82 feet from the tower portion of the neighboring Sequoias complex and approximately 40 feet from the existing 1333 Gough Street building (see **Figure 2.10** on p. 2.18). The proposed project exceeds the side yard requirement (as no side yard is required) from the neighboring Sequoias complex. Unlike in certain Downtown Zoning Districts, RM-4 Districts do not have any regulations that govern the separation of towers (the distance between the upper portions of buildings that occur above their respective building bases). The regulations that relate to the spacing between buildings within RM-4 Districts are the front setback, open space, rear yard and dwelling unit exposure requirements of the Planning Code. The Planning Code does not require side yards in RM-4 Districts. As discussed above, the proposed project does not comply with the minimum rear yard (the distance from the south façade of the proposed tower to the Geary Boulevard property line) and dwelling unit exposure requirements.

As the project site is over 0.5 acres in size, implementation of the proposed project would require the modification or waiver of the Planning Code requirements noted above through the approval of a PUD (a modification of the previously approved PUD).³

HEIGHT AND BULK DISTRICTS

The project site is in a 240-E Height and Bulk District, which establishes a maximum building height of 240 feet. Planning Code Section 102.12 defines the height of a building or structure as the vertical distance by which a building or structure rises above a certain point of measurement, with said point generally being at curb level at the centerline of the building or structure. Pursuant to Planning Code § 260(a)(2), the height of a building is measured to the highest point on the finished roof in the case of a flat roof and to the average height of the rise in the case of a pitched or stepped roof or a similarly sculpted roof form. Pursuant to Planning Code § 260(b), certain building features, including but not limited to parapets, mechanical equipment or appurtenances necessary to the operation or maintenance of the building, and elevator, stair, and mechanical penthouses, are exempt from the measurement of building height.

³ Planning Commission Resolution No. 5635, adopted on February 7, 1963, authorized a PUD of six multi-story residential buildings with about 891 dwelling units and associated commercial uses. The PUD covered three areas, one of which included the project site and the adjacent lot to its west (now the site of The Sequoias). The existing 1333 Gough Street building was developed pursuant to the PUD. Planning Commission Resolution No. 5946, adopted on December 2, 1965, amended the 1963 PUD to allow the development of The Sequoias.

Bulk controls reduce the size of a building's floorplates as the building increases in height. Pursuant to Planning Code § 270(a), the bulk controls in the "E" Bulk District become effective above a building height of 65 feet. Above a building height of 65 feet, the plan dimensions are limited to a maximum horizontal dimension of 110 feet and a maximum diagonal dimension of 140 feet.

The proposed project would not comply with the height and bulk controls. At a height of 398 feet, as measured pursuant to Planning Code § 260(a)(2), the proposed 1481 Post Street tower would exceed the height limit of 240 feet. Above a height of 65 feet, the proposed tower would have an east-west horizontal dimension of 118 feet, exceeding the maximum horizontal dimension of 110 feet permitted in an "E" Bulk District. Above a height of 65 feet, the proposed project would comply with the maximum diagonal dimension of 140 feet permitted in an "E" Bulk District.

Implementation of the proposed project would require the adoption of legislative amendments to reclassify the existing height and bulk limit from 240-E to 410-G. This reclassification would allow a 410-foot-tall building, as measured pursuant to Planning Code § 260(b), and the proposed project is 398 feet tall. Pursuant to Planning Code § 270(a), the bulk controls in the "G" Bulk District become effective above a building height of 80 feet. Above a building height of 80 feet, the plan dimensions are limited to a maximum horizontal dimension of 170 feet and a maximum diagonal dimension of 200 feet.

Physical environmental impacts that could result from the conflicts noted above are discussed in **Section 4.F, Wind and Shadow.**

THE ACCOUNTABLE PLANNING INITIATIVE

In November 1986, the voters of San Francisco approved Proposition M, the Accountable Planning Initiative, which added § 101.1 to the Planning Code and established eight Priority Policies. These policies are (1) preservation and enhancement of neighborhood-serving retail uses and future opportunities for resident employment in and ownership of such businesses; (2) conservation and protection of existing housing and neighborhood character to preserve the cultural and economic diversity of neighborhoods; (3) preservation and enhancement of affordable housing; (4) discouragement of commuter automobiles that impede Muni transit service or that overburden streets or neighborhood parking; (5) protection of industrial and service land uses from commercial office development and enhancement of resident employment and business ownership; (6) maximization of earthquake preparedness; (7) preservation of landmarks and historic buildings; and (8) protection of parks and open space and their access to sunlight and vistas.

The proposed project would cast net new shadow on Peace Plaza, the Hamilton Recreation Center, Raymond Kimbell Playground, and Cottage Row Mini Park at different times in the morning throughout the year. All of these parks are under the jurisdiction of the Recreation and Park Commission and are subject to the provisions of Planning Code Section 295. The proposed project would also cast net new shadow on Gene Suttle Plaza and Fillmore Center Plaza, two open spaces that are not under the jurisdiction of the Recreation and Park Commission and are not subject to the provisions of Planning Code Section 295. The net new project shadow would not substantially conflict with Priority Policy No. 8, because there would still be substantial areas of sunlight in the affected parks and open spaces during the times when the proposed project would cast net new shadow on these parks and open spaces. The physical environmental impacts that could result from this net new shadow are discussed in **Section 4.F, Wind and Shadow**.

Prior to issuing a permit for any project that requires an Initial Study under CEQA, prior to 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 such project or action would be consistent with the Priority Policies. The consistency of the proposed project with the environmental topics associated with the Priority Policies is discussed in Section E, Evaluation of Environmental Effects, of the Initial Study, or in **Chapter 4, Environmental Setting, Impacts, and Mitigation**, of this EIR. 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 the Priority Policies.

4. ENVIRONMENTAL SETTING, IMPACTS, AND MITIGATION

A. INTRODUCTION

This chapter of the EIR addresses the physical environmental effects of the proposed project. The Planning Department distributed a Notice of Preparation/Initial Study (NOP/IS) on June 12, 2013, announcing its intent to prepare and distribute an EIR to solicit comments from the public about the scope of this EIR (the NOP/IS is presented as **Appendix A** to this EIR).

The Initial Study determined that project-specific and cumulative impacts in certain topic areas would have no impact or less-than-significant impacts, and therefore would not require analysis in this EIR. The topics of Land Use and Land Use Planning (physical division of established communities), Population and Housing, Cultural and Paleontological Resources, Air Quality (odors), Greenhouse Gas Emissions, 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 Agriculture and Forest Resources will not be discussed further in the EIR. Please refer to the Initial Study in **Appendix A** for a discussion of these topics.

The Initial Study determined that the proposed project could result in potentially significant impacts in the following topic areas: Land Use and Land Use Planning (all topics except physical division of established communities); Aesthetics; Transportation and Circulation; Noise; Air Quality (all topics except odors); and Wind and Shadow. Except for Aesthetics, these topics are evaluated in this EIR. The following discussion explains why this chapter of the EIR does not include consideration of aesthetics-related impacts.

SENATE BILL 743 AND PUBLIC RESOURCES CODE § 21099

On September 27, 2013, Governor Brown signed Senate Bill (SB) 743, which became effective on January 1, 2014.¹ Among other provisions, SB 743 amended CEQA by adding Public

¹ State of California Legislative Information website. The text of SB 743 is available online at http://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201320140SB743. Accessed January 9, 2014.

Resources Code § 21099 regarding the analysis of aesthetics and parking impacts for certain urban infill projects in transit priority areas.²

Aesthetics and Parking Analysis

Public Resources Code § 21099(d), effective January 1, 2014, provides that “aesthetics 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.” 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:

1. The project is in a transit priority area; and
2. The project is on an infill site; and
3. The project is residential, mixed-use residential, or an employment center.

The proposed project meets each of the above three criteria, and thus this EIR does not consider aesthetics and the adequacy of parking in determining the significance of project impacts under CEQA.³

Public Resources Code § 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. As such, there will be no change in the Planning Department’s methodology related to design and historic review.

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 the EIR (i.e., the visual simulations) has been included in **Chapter 2, Project Description**, of this EIR.

² 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 § 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 online at <http://sfmea.sfplanning.org/Map%20of%20San%20Francisco%20Transit%20Priority%20Areas.pdf>.

³ San Francisco Planning Department, *Transit-Oriented Infill Project Eligibility Checklist*, 1333 Gough/1481 Post Street Mixed-Use Project, Case No. 2005.0679E, May 9, 2014. A copy of this document is available for review at the San Francisco Planning Department, 1650 Mission Street, Suite 400, as part of Case File No. 2005.0679E.

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 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 transportation analysis in **Section 4.C, Transportation and Circulation**.

Level of Service Analysis

Senate Bill 743 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 within transit priority areas that promote the “...reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses.” It also allows OPR to develop alternative metrics outside of transit priority areas. The statute provides that, upon certification and adoption of the revised *CEQA Guidelines* by the Secretary of the Natural Resources Agency, “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 pursuant” to CEQA. In other words, LOS generally shall not be used as a significance threshold under CEQA. These changes would need to be adopted by the Secretary of the Natural Resources Agency and are anticipated to be effective sometime in 2015. Therefore, the LOS-related provisions of SB 743 are not yet applicable to the proposed project and this EIR analyzes the traffic-related impacts of the project as they pertain to LOS.

FORMAT OF THE ENVIRONMENTAL ANALYSIS

This chapter contains five sections in addition to this Introduction, each addressing a different environmental topic. They are **Section 4.B, Land Use and Land Use Planning**; **Section 4.C, Transportation and Circulation**; **Section 4.D, Noise**; **Section 4.E, Air Quality**; and **Section 4.F, Wind and Shadow**. Each of these sections contains the following subsections: Introduction, Environmental Setting, Regulatory Framework, and Impacts and Mitigation Measures.

The Introduction subsection for each topic describes the types of impacts that are analyzed, refers the reader to the pages in the Initial Study that address the topic, and summarizes the Initial Study conclusion(s) for the topic.

The Environmental Setting subsection for each topic describes the existing conditions in the project site vicinity. Existing conditions are generally defined as the physical conditions that existed at the time that the NOP/IS for the proposed project was published on June 12, 2013.

4. Environmental Setting, Impacts, and Mitigation

A. Introduction

Existing conditions serve as the baseline for the analysis of environmental impacts (adverse physical changes) that would result from implementation of the proposed project, presented under the Impacts and Mitigation Measures subsection.

The Regulatory Framework subsection describes federal, state and local regulatory requirements that are directly applicable to the environmental topic.

The Impacts and Mitigation Measures subsection describes the physical environmental impacts of the proposed project for each topic, as well as any mitigation measures that could reduce impacts to less-than-significant levels. This subsection begins with a listing of the significance thresholds used to assess the severity of the environmental impacts for that particular topic. These thresholds reflect the Planning Department's Initial Study checklist. Certain environmental topic sections also include a topic-specific "Approach to Analysis," which follows the "Significance Thresholds" subsection. This discussion explains the parameters, assumptions, and data used in the analysis. (The general approach used to evaluate project-level and cumulative environmental impacts for all topics is described under "Approach to Analysis," on pp. 4.A.5-4.A.7.) This is followed by a "Project Features" discussion, which summarizes aspects of the project relevant to each topic.

Under the "Impact Evaluation" discussion, the project-level impact analysis for each topic begins with an impact statement that reflects the applicable significance thresholds. Some significance thresholds may be combined in a single impact statement, if appropriate. Each impact statement is keyed to a subject area abbreviation (e.g., LU for Land Use) and an impact number (e.g., 1, 2, 3) for a combined alpha-numeric code (e.g., Impact LU-1, Impact LU-2, Impact LU-3). When potentially significant impacts are identified, mitigation measures are presented to avoid, eliminate, or reduce significant adverse impacts of the project. Improvement measures are identified that would further reduce less-than-significant effects of the proposed project. Each mitigation measure corresponds to the impact statement and has an "M" in front to signify it is a mitigation measure (e.g., Mitigation Measure M-LU-1 for a mitigation measure that corresponds to Impact LU-1). If there is more than one mitigation measure for the same impact statement, the mitigation measures are numbered with a lowercase letter suffix (e.g., Mitigation Measures M-LU-1a and M-LU-1b). Improvement measures are designated with an "I" to signify "improvement measure," the topic code, and a letter (e.g., I-LU-A).

Each impact statement describes the impact that would occur without mitigation. The level of significance of the impact is indicated in parentheses at the end of the impact statement based on the following terms:

- **No Impact** – No adverse physical changes (or impacts) to the environment are expected.

- **Less Than Significant** – Impact that 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.
- **Less Than Significant with Mitigation** – Impact that is reduced to a less-than-significant level through implementation of the identified mitigation measures.
- **Significant and Unavoidable with Mitigation** – Impact that exceeds the defined significance criteria and can be reduced through compliance with existing local, state, and federal laws and regulations and/or implementation of all feasible mitigation measures, but cannot be reduced to a less-than-significant level.
- **Significant and Unavoidable** – Impact that exceeds the defined significance criteria and cannot be eliminated or reduced to a less-than-significant level through compliance with existing local, state, and federal laws and regulations and for which there are no feasible mitigation measures.

Cumulative impacts of the proposed project are described in a separate subsection following the complete project-level impact analysis for each topic. Cumulative impact statements are numbered consecutively for each impact statement with a combined alpha-numeric code to signify it is a cumulative impact. For example, C-LU-1 refers to the first cumulative impact for Land Use and Land Use Planning.

APPROACH TO ANALYSIS

To evaluate these project impacts, each environmental topic in Chapter 4 of the EIR addresses impacts related to construction and operation of a new 262-unit, 36-story, 398-foot-tall (416 feet tall including an 18-foot-tall mechanical penthouse), 437,500-gsf residential building (the proposed 1481 Post Street building) west of 1333 Gough Street on the project site, and the modifications to the existing 1333 Gough Street building. Three variants to the proposed project are also described and studied in this EIR.

Cumulative impacts are analyzed for each environmental topic and the proposed project's contribution to cumulative impacts, if any, is discussed. In accordance with CEQA, cumulative impacts may be analyzed by applying a list-based approach (a list of past, present, and reasonably foreseeable future projects, including projects outside the control of the lead agency), a plan-based approach (a summary of projections in an adopted general plan or related planning document), or a reasonable combination of the two.⁴ In general, the City and County of San Francisco uses a plan-based approach that relies on local/regional growth projections (i.e., population, jobs, and number and type of residential units). This is the approach that is used for many of the environmental topics in this EIR. However, for certain topics, consideration of a list

⁴ *CEQA Guidelines*, § 15130(b)(1).

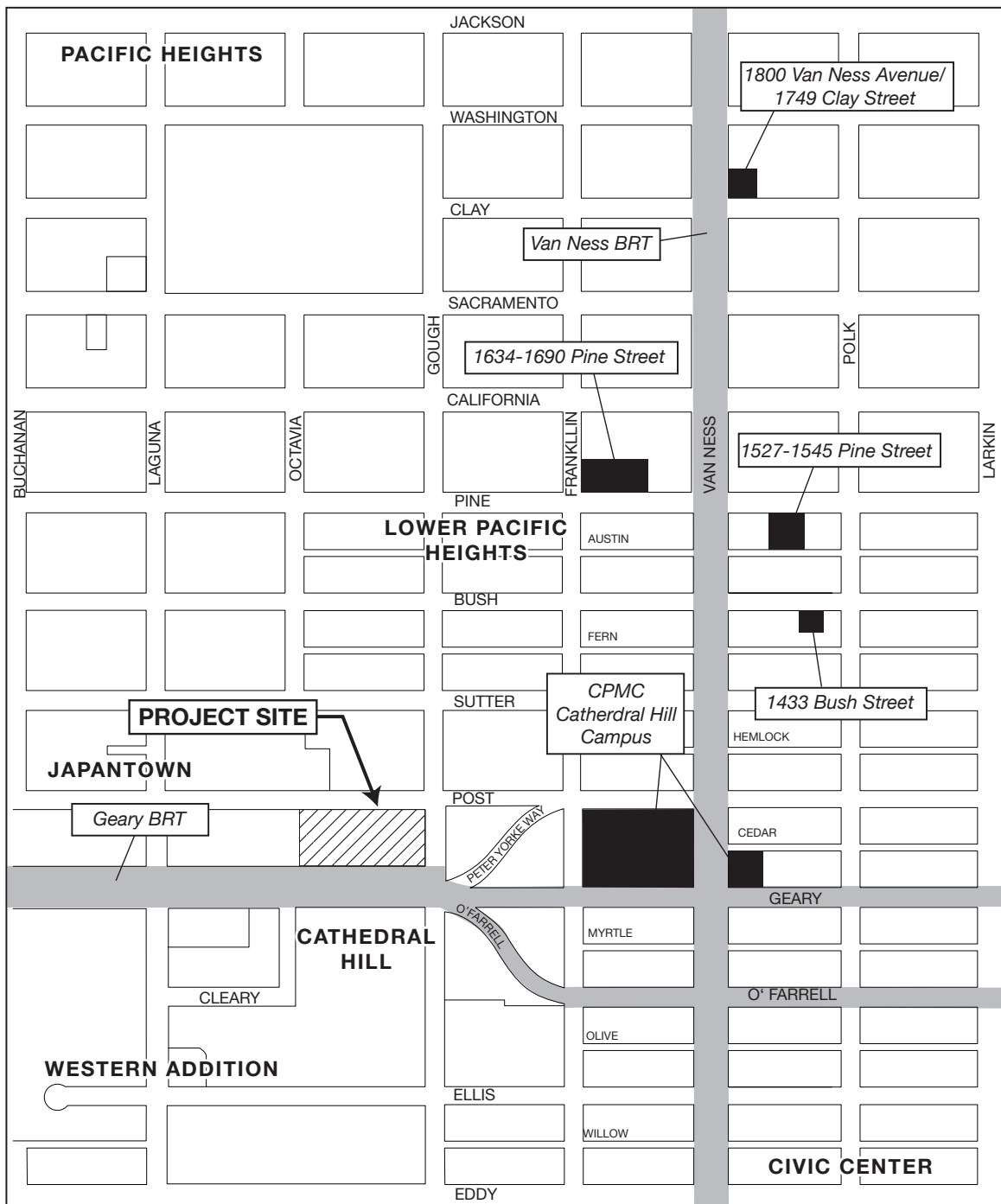
of projects is more appropriate. The cumulative analyses in the Noise and Wind and Shadow sections each use a different list of nearby projects that is appropriately tailored to the particular environmental topic based upon the potential for combined localized environmental impacts. These are described in the respective topical sections in this chapter.

Reasonably foreseeable probable future projects are those for which the Planning Department has an Environmental Evaluation Application on file. These projects are located within about a quarter-mile radius of the project site and include the following:

- **1433 Bush Street (Case No. 2009.1074E) (Under Review):** This project encompasses the demolition of a one-story building and the construction of an approximately 112-foot-tall, 63,130-gsf building containing up to a total of 26 dwelling units, 33 off-street parking spaces, and approximately 2,100 gsf of commercial space.
- **1527-1545 Pine Street (Case No. 2006.0383E) (Under Review):** This project calls for the demolition of five existing commercial buildings and the construction of a 6- to 12-story building containing a total of 107 dwelling units, 82 parking spaces, and approximately 2,844 gsf of commercial space.
- **1634-1690 Pine Street (Case No. 2011.1306E) (Approved):** This project calls for the demolition of five existing commercial and industrial buildings and the construction of two 13-story residential towers containing up to 260 dwelling units, 262 parking spaces, and approximately 4,900 gsf of commercial space.
- **1101 Van Ness Avenue / 1255 Post Street (California Pacific Medical Center Cathedral Hill Campus) (Case No. 2005.0555E) (Under Construction):** This project calls for the demolition of the Cathedral Hill Hotel and office building and the construction of California Pacific Medical Center's Cathedral Hill medical campus on the west side of Van Ness Avenue, which would include a hospital building (989,230 gsf, 12 stories, 226 feet tall, 304 beds, as approved) and a medical office building on the east side of Van Ness Avenue between Geary and Post streets.
- **1800 Van Ness Avenue / 1749 Clay Street (Case No. 2004.0339E) (Under Construction):** This project includes the construction of an 8-story building and a 4-story building, which together would contain 98 dwelling units, 103 parking spaces, and approximately 4,900 gsf of commercial space.
- **Geary Bus Rapid Transit (BRT) project (State Clearinghouse No. 2008112095) (Under Review):** This is a program to improve Muni bus service along Geary Street/Geary Boulevard through the implementation of operational and physical improvements. Operational improvements consist of (1) designating bus-only lanes to allow buses to travel with fewer impediments, (2) adjusting traffic signal timing to give buses more green lights 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.

- **Van Ness BRT Project (State Clearinghouse No. 2007092059) (Approved):** This is a program to improve Muni bus service along Van Ness Avenue between Lombard and Mission streets that entails the same types of operational and physical improvements discussed under the Geary BRT project.
- **Transit Effectiveness Project (TEP) (Case No. 2011.0558E) (Approved):** This is a joint effort between the San Francisco Municipal Transportation Agency, the Planning Department, and the Controller's Office to maximize Muni service delivery. The objectives of the TEP are to improve service reliability, reduce transit travel time, enhance customer experiences, and improve service effectiveness and efficiency. The TEP is comprised of four major categories: a service policy framework, service improvements, service-related capital projects, and travel time reduction proposals.

See **Figure 4.A.1: Location of Foreseeable Future Projects in the Vicinity of the Proposed Project.**



SOURCE: Turnstone Consulting



1333 GOUGH STREET/1481 POST STREET

2005.0679E

FIGURE 4.A.1: LOCATION OF FORESEEABLE FUTURE PROJECTS IN THE VICINITY OF THE PROPOSED PROJECT

B. LAND USE AND LAND USE PLANNING

INTRODUCTION

Section 4.B, Land Use and Land Use Planning, examines the effects of the proposed project that are related to land use and land use planning, discusses the effects on existing land use that would occur if the proposed project were implemented, and discusses the cumulative land use effects of the proposed project in combination with other proposed, planned, or reasonably foreseeable development projects.

The Notice of Preparation/Initial Study (NOP/IS, **Appendix A** to this EIR), pp. 43-45, determined that the proposed project would not physically divide an established community; would potentially conflict with applicable land use plans, policies, and regulations of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect; and could have a substantial impact on the existing character of the vicinity.

ENVIRONMENTAL SETTING

EXISTING USES AND LAND USE CHARACTER

Project Site

The eastern portion of the project site is currently occupied by 1333 Gough Street, a 14-story, 138-foot-tall, 214,400-gross-square-foot (gsf) apartment building containing 169 dwelling units and a 4,700-gsf private fitness center, which includes indoor exercise facilities and outdoor tennis courts. There are two surface parking lots in the northeast and southeast corners of the project site, and a parking structure on the western portion of the project site. In total, there are 176 parking spaces on the project site.

1333 Gough Street was constructed in 1965 under the former Western Addition A-1 Redevelopment Plan. The 235-foot length of the concrete Modernist building slab is oriented east-west, running parallel to Post Street to the north and Geary Boulevard to the south. The building is set back from both Post Street and Geary Boulevard by about 62 feet. The eastern end of the building slab (about one-quarter of the building's length) is raised on piles, creating a covered area beneath the raised eastern end of the building. The building's lobby entrance at the ground floor faces east onto this covered area and is set back from the Gough Street sidewalk and the eastern face of the building above.

The existing 65,100-gsf parking structure is U-shaped in plan, wrapping around the ground-floor base of the 1333 Gough Street building to its north, west, and south. The parking structure forms a low (about ½- to 1-story), horizontal feature along the western three-quarters of the project site

at its Post Street and Geary Boulevard frontages. The parking structure is unadorned painted concrete. On the roof of the parking structure, visible along Geary Boulevard at the western end of the project site, is the 1-story pool building (now permanently closed). Along Post Street at the western end of the project site, the parking structure is surmounted by a chain-link fence that encloses the tennis courts. The parking structure is set back from the Post Street sidewalk by a 5-foot-wide planting strip and from the Geary Boulevard sidewalk by a 10-foot-wide planting strip.

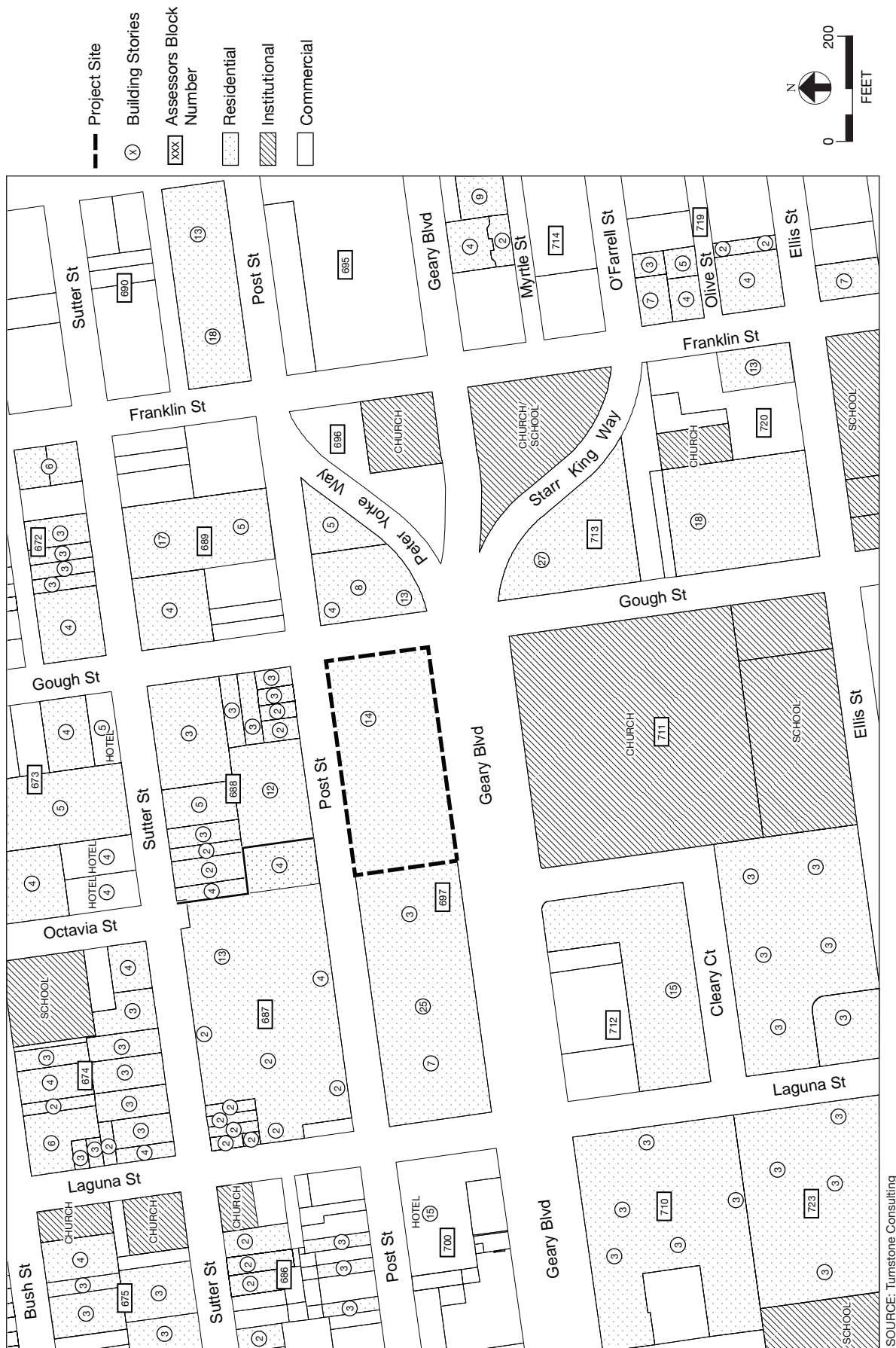
Project Vicinity¹

Figure 4.B.1: Land Uses in the Project Vicinity shows existing land uses in the vicinity of the project site. As shown in this figure, the project block and blocks to west, north, east, and south do not conform to the historic street grid pattern of the Western Addition, a regular orthogonal grid of through-streets and rectangular blocks (in the larger project vicinity, typically measuring about 412 feet running east-west, and about 275 feet running north-south). Street vacations, building demolition, and roadway reconfiguration as part of extensive urban renewal efforts of the 1950s and 1960s have resulted in comparatively large blocks and development parcels within the former Western Addition Redevelopment Areas.

On the project block, the City and County of San Francisco vacated Octavia Street as part of adopting and implementing the Western Addition A-1 Redevelopment Plan in the mid-1950s. The former Octavia Street right-of-way on the project block was deeded to the neighboring Sequoias retirement community (discussed below) in 1964 and the associated easement was vacated in 1997 to build the existing Sequoias health center facility near the west property line of the project site. The project block measures 894 feet running east-west and 197 feet running north-south. The project block's north-south dimension was narrowed to construct the widened Geary Boulevard.

The existing land use character of the surrounding vicinity is consistent with a mixed-use, primarily residential neighborhood. The physical character of surrounding development is varied. Building massing, scale, materials, character, siting, and age do not conform to any strongly discernible overall pattern.

¹ This EIR describes building heights as a measurement in feet above ground surface and/or as a number of building stories. For the purposes of this EIR, one residential story is equivalent to about 10 to 12 feet, although ground-floor stories are often higher (up to 15 feet). The term "low-rise" refers to buildings that are 1 to 4 stories and up to 40 feet tall. The term "mid-rise" refers to buildings that are 5 to 8 stories and up to 85 feet tall. The term "high-rise" refers to buildings that are above 85 feet tall.



- Project Site
- ⊗ Building Stories
- xxx Assessor's Block Number
- Residential
- Institutional
- Commercial

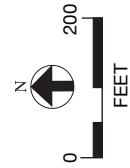


FIGURE 4.B.1: LAND USES IN THE PROJECT VICINTY

1333 GOUGH STREET/1481 POST STREET

SOURCE: Turnstone Consulting

2005.0679E

To the West

Immediately to the west of the project site within the project block (Block 0697) is The Sequoias, a 3- to 25-story retirement community complex. The Sequoias is operated by the Northern California Presbyterian Homes and Services. The easternmost portion of the neighboring Sequoias property is occupied by a 3-story health center facility, licensed for 50 skilled nursing beds, 18 units of assisted living, and 19 memory care beds.

The Sequoias complex is a composition of rectilinear volumes featuring the vertical 25-story, 270-foot-tall high-rise tower slab (as height is measured under Planning Code § 102.12 and Planning Code § 260 to the finished roof). Including its rooftop mechanical penthouse element, the Sequoias tower rises a total of about 304 feet. The Sequoias tower was built in 1969. Its 158-foot length in plan is oriented east-west along Geary Boulevard and Post Street. The Sequoias residential tower is located about 70 feet west of the property line shared with the project site. The tower façades are clad in white cast masonry panels which together form a grid of windows. A lower, 8-story (about 90 feet tall) podium rises to the west of the tower, stepping down from the tower along the slope of Post Street and Geary Boulevard. At street level, the complex presents a wall along most of the length of its Post Street, Laguna Street, and Geary Boulevard frontages. The easternmost portion of the Sequoias property is occupied by the 3-story health center facility, built in 1997. At its closest point, the 3-story Sequoias health center facility is about 6 feet, 8 inches west of the property line shared with the project site. See **Figure 2.10** on p. 2.18. A public easement along the alignment of Octavia Street was vacated by the City in 1997 to allow for the construction of the addition within the former Octavia Street right-of-way.

Further west of the project site is the Japan Center, built in 1968. This five-acre complex (with retail, restaurant, entertainment, hotel, office, community, and public open space uses) is bounded by Post Street, Geary Boulevard, Laguna Street, and Fillmore Street. The complex includes Peace Plaza, the Kintetsu and Miyako Malls, the Kinokuniya Building, the Sundance Kabuki movie theatre, and the Radisson Miyako Hotel (Block 0700). Except for the 100-foot-tall Peace Pagoda in Peace Plaza and the 15-story Miyako Hotel at Laguna Street, the complex is generally low rise (2-3 stories). Most of the buildings are stucco clad and include wood details that suggest traditional Japanese timber framing. Visual interaction between Japan Center and the project site is limited by distance and by the scale of the intervening Sequoias complex.

To the North

The uses to the north of the project site across Post Street are primarily residential. Directly northwest of the project site (Block 0687) is the 1970s-era Nihonmachi Terrace, a residential complex of two- and four-story residential buildings at 1490-1592 Post Street, and a 13-story residential building at 1619 Sutter Street, near the Octavia Street alignment. The uses across Post

4. Environmental Setting, Impacts, and Mitigation

B. Land Use and Land Use Planning

Street and directly north of the project site (Block 0688) include the 12-story Carlisle Senior Living Center at 1450 Post Street, built in 1992. The horizontal volume of the Carlisle is articulated with setbacks into three main sections. Directly north of the 1333 Gough Street building is a grouping of two- and three-story Victorian-era rowhouses with single-family residential uses at 1400, 1402, 1406-1408, and 1410 Post Street. These structures are characterized by their small scale and fine-grained woodwork and ornamentation.

Northeast of the project site (Block 0689), the Intercultural Institute of California-Korean Center operates out of a three-story Victorian-era building at the northeast corner of Post and Gough streets at 1362 Post Street. Further east of the Korean Center is a 7-story residential building with ground-floor retail (at 1336 Post Street, but fronting Sutter Street) and the Sutterfield, a 17-story residential tower over a 5-story podium. The block also includes the Spanish Consulate at 1405 Sutter Street.

The area further north of the project site along Sutter Street is generally characterized by residential development of mostly low-rise and some mid-rise buildings of varied character and dates of construction. Schools, churches, and hotels are also within this area. Unlike development to the east, south, and west of the project site, development to the north of the project site is generally finer-grained in scale, and is built at or near the property line, maintaining a cohesive, yet varied, streetwall.

To the East

On the block immediately east of the project site (Block 0696), the Post International complex at 1388 Gough Street, built in 1993, has three buildings: a 13-story residential tower at the corner of Gough Street and Geary Boulevard, a 4-story residential/commercial building at the corner of Gough and Post streets, and an 8-story residential building on Gough Street at midblock. The buildings of this complex are contemporary in architectural character and are clad in a combination of masonry panel and metal and glass curtain wall. The ground floor along Post Street is comprised of pedestrian-oriented storefronts.

Further east, a five-story residential building is located on the north side of Peter Yorke Way (which bisects the block diagonally) adjacent to the Post International development. The Archdiocese of San Francisco is headquartered in a four-story commercial building at One Peter Yorke Way. A large area in the northeastern portion of the block is reserved for surface parking. The Hamilton Square Baptist Church is at the northwest corner of Franklin Street and Geary Boulevard.

The block directly southeast of the project site (Block 0713 and Block 0720 combined) is bounded by Geary Boulevard and Franklin, Ellis, and Gough streets; the northern part of the

4. Environmental Setting, Impacts, and Mitigation

B. Land Use and Land Use Planning

block is bisected by Starr King Way. The Cathedral Hill Tower at 1200 Gough Street, a 27-story residential building built in 1966, is within that block. The building is hexagonal in plan. The First Unitarian Universalist Church and Center and Montessori House of Children occupy the northeast part of the block. South of the Cathedral Hill Tower building is the Carillon Tower, an 18-story residential building at 1100 Gough Street, built in 1964. The Carillon Tower is circular in plan, creating a distinctive cylindrical tower form. Saint Mark's Square, south of Starr King Way, is home to Saint Mark's Lutheran Church, the Urban Life Center, and The Martin Luther Tower, a 13-story residential building at the corner of Ellis and Franklin streets. The block also includes the Sacred Heart Cathedral Preparatory School at 1055 Ellis Street.

The commercial corridor along Van Ness Avenue is two blocks east of the project site. Major uses along Van Ness Avenue include the One Daniel Burnham Court building (on the north side of Post Street between Franklin Street and Van Ness Avenue), which has 13- and 18-story residential towers with ground-floor retail uses. At the northwest corner of Van Ness Avenue and Geary Boulevard is the Cathedral Hill Hotel (1101 Van Ness Avenue), which is currently being demolished and is slated for redevelopment as the California Pacific Medical Center's Cathedral Hill medical campus. Other uses along the Van Ness Avenue commercial corridor include restaurant, residential, retail, office, and automotive uses.

To the South

The Cathedral of Saint Mary of the Assumption (St. Mary's Cathedral) and Sacred Heart Cathedral Preparatory School are directly south of the project site across Geary Boulevard (Block 0711). The cathedral building is approximately 190 feet tall and is set back by more than 200 feet from Geary Boulevard, a 156-foot-wide roadway. The cathedral is a singular sculptural form at the center of an open plaza. The visually prominent Modernist cathedral building is square in plan at its base, tapering upward in such a fashion as to form a cross in plan at its top.

West of the cathedral (Block 0712), the Chinese Consulate occupies a complex of one- to three-story buildings that front Geary Boulevard and Laguna Street, built from 1936-1963. The 66 Cleary Court Condominiums are in a 15-story residential building south of the consulate. One block further to the southwest is the Saint Francis Square Cooperative Apartments complex (Block 0710), which is comprised of three-story residential buildings along Geary Boulevard and Laguna Street.

ZONING DISTRICTS

Use Districts

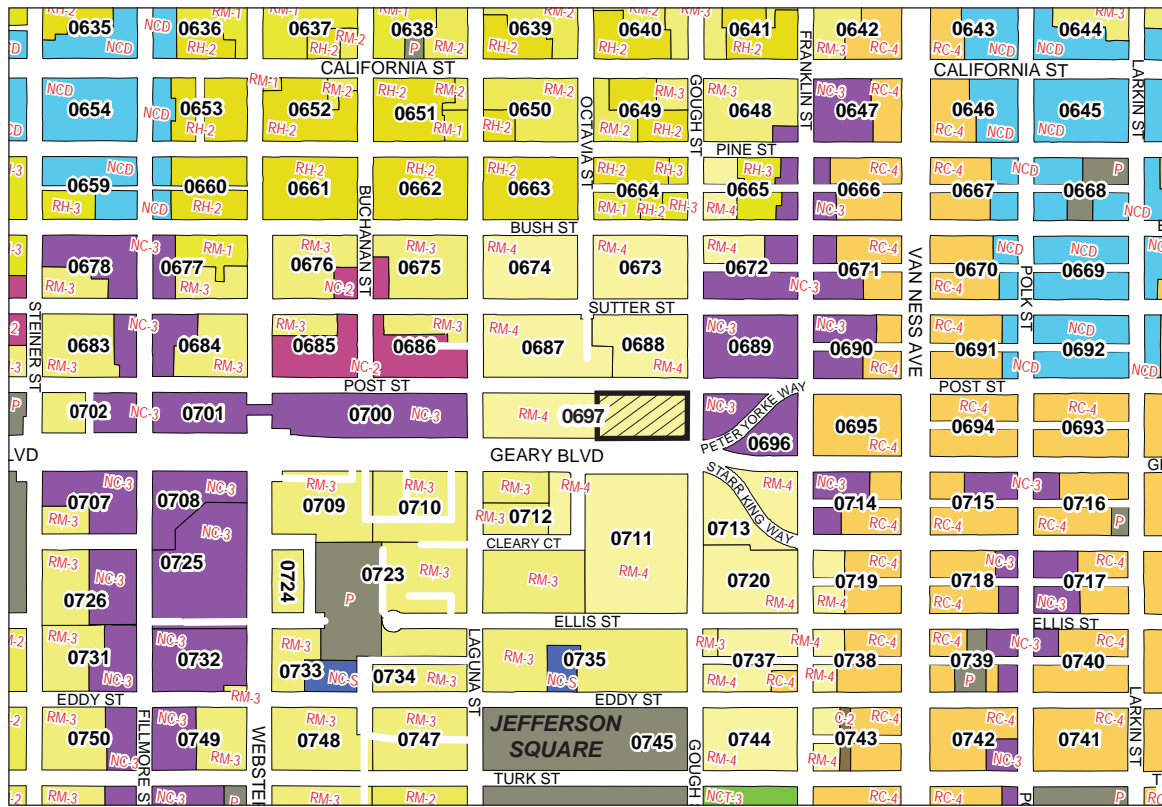
The project site is in an RM-4 (Residential, Mixed, High Density) District. As described in Planning Code § 206.2, RM-4 Districts are devoted almost exclusively to apartment buildings of high density, usually with smaller units, close to Downtown. Planning Code § 209.1 through § 209.9 regulate the types of land uses that are principally permitted, conditionally permitted, or not permitted in RM-4 Districts. The different zoning districts around the project site are shown in **Figure 4.B.2: Existing Zoning Districts in the Project Vicinity**.

The blocks to the south of the project block are zoned RM-3 (Residential, Mixed, Medium Density) and RM-4. The blocks to the west, which include the Japan Center, are zoned NC-2 (Small-Scale Neighborhood Commercial) and NC-3 (Moderate-Scale Neighborhood Commercial). The blocks to the north of the project block are zoned RM-4, and the blocks to the east are zoned NC-3. Other zoning districts within three blocks of the project block include NC-S (Neighborhood Commercial Shopping Center) and P (Public Use) Districts to the south, RH-2 (Residential, House, Two-Family), RH-3 (Residential, House, Three-Family), and RM-1 (Residential, Mixed, Low Density) Districts to the north, and an RC-4 (Residential-Commercial Combined, High Density) District to the east.


There are three special use districts (SUDs) near the project site. The Japantown SUD, which covers a nine-block area, is west of the project block across Laguna Street. The Automotive SUD, which covers an area generally bounded by Sacramento Street on the north, Polk/Larkin Street on the east, and Golden Gate Avenue on the south, and Franklin Street on the west, is one block east of the project site. Covering much of the same area as the Automotive SUD, the Van Ness SUD encompasses an area generally bounded by Broadway on the north, Polk Street on the east, Golden Gate Avenue on the south, and Franklin Street on the west.

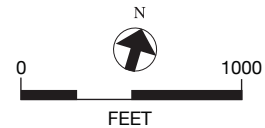
Height and Bulk Districts

The project site is in a 240-E Height and Bulk District, which establishes a maximum building height of 240 feet (see **Figure 4.B.3: Existing Height and Bulk Districts in the Project Vicinity**). Bulk controls reduce the size of a building's floorplates as the building increases in height. Pursuant to Planning Code § 270(a), the bulk controls in the "E" Bulk District become effective above a building height of 65 feet. Above a building height of 65 feet, the plan dimensions are limited to a maximum horizontal dimension of 110 feet and a maximum diagonal dimension of 140 feet.



SOURCE: San Francisco Planning Department

 Project Site



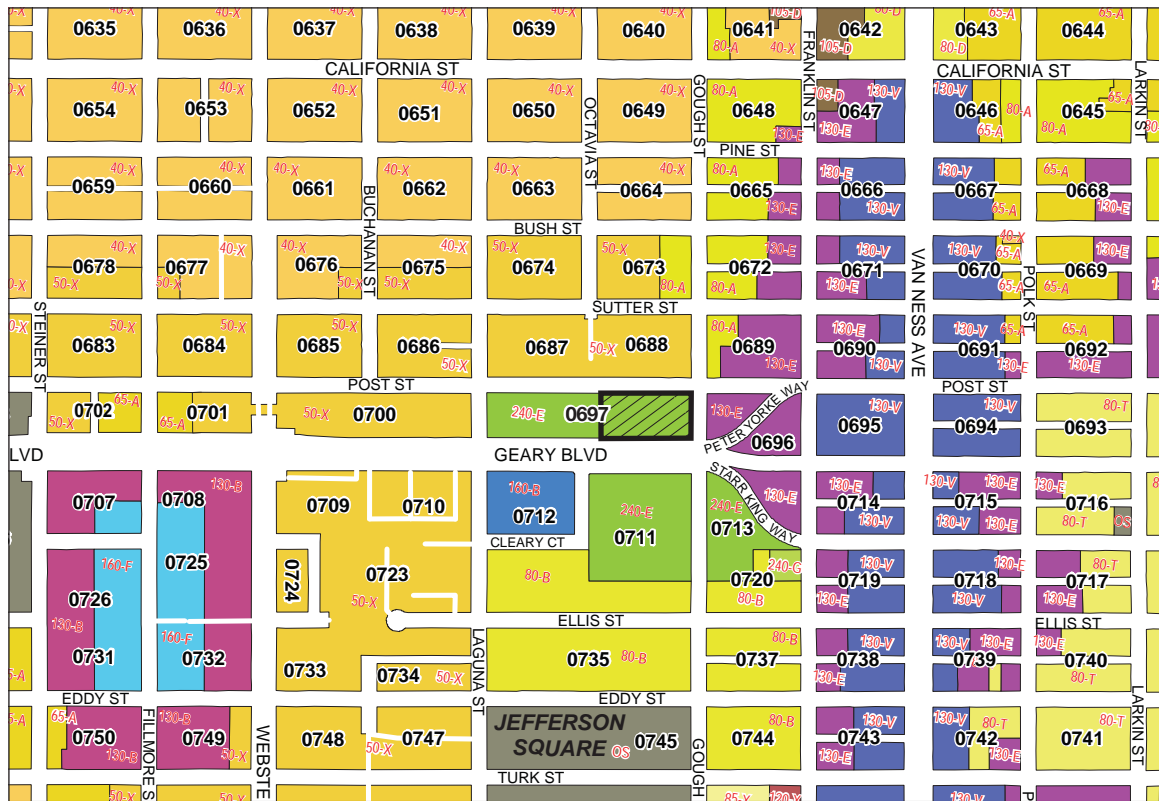
- NC-3 Moderate-Scale Neighborhood Commercial
- NC-S Neighborhood Commercial Shopping Center
- NCD Named Neighborhood Commercial District*
- P Public Use
- RC-4 Residential-Commercial Combined, High Density
- RH-2 Residential, House, Two-Family
- RH-3 Residential, House, Three-Family
- RM-1 Residential, Mixed, Low Density
- RM-2 Residential, Mixed, Moderate Density
- RM-3 Residential, Mixed, Medium Density
- RM-4 Residential, Mixed, High Density

* Named Neighborhood Commercial Districts shown on this figure include the Fillmore Street NCD and the Polk Street NCD.

1333 GOUGH STREET/1481 POST STREET

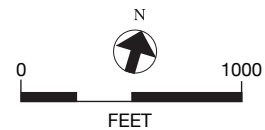
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**FIGURE 4.B.2: EXISTING ZONING DISTRICTS
IN THE PROJECT VICINITY**



SOURCE: San Francisco Planning Department


 Project Site



 Open Space District

Numbers are Height Limits in feet. See Planning Code Section 250 and following.

Letters refer to Bulk Limits. See Planning Code Section 270

 Suffix Numbers identify districts in which special regulations apply. See Planning Code Sections 263 and following.

1333 GOUCH STREET/1481 POST STREET

2005.0679E

**FIGURE 4.B.3: EXISTING HEIGHT AND BULK DISTRICTS
IN THE PROJECT VICINITY**

Other height and bulk districts within three blocks of the project site include OS² to the south, 130-B and 160-F to the southwest, 65-A to the west, 40-X to the northwest and north, and 80-A to the northeast.

REGULATORY FRAMEWORK

Land use development in San Francisco is regulated by the *San Francisco General Plan (General Plan)*, San Francisco Planning Code (Planning Code), and the Zoning Maps.

SAN FRANCISCO GENERAL PLAN

The *General Plan* is the embodiment of the City's vision for the future of San Francisco. It is comprised of a series of ten elements, each of which deals with a particular topic that applies citywide: Air Quality; Arts; Commerce and Industry; Community Facilities; Community Safety; Environmental Protection; Housing; Recreation and Open Space; Transportation; and Urban Design. The *General Plan* elements that contain objectives and policies relevant to the proposed project include, but are not limited to, the following:

Urban Design Element

The Urban Design Element addresses the physical character of the City and the relationship between people and their environment. Urban Design Element Objective 1 calls for "Emphasis of the characteristic pattern which gives the City and its neighborhoods an image, a sense of purpose, and a means of orientation." Of particular relevance to this analysis are:

- Policy 1.1: Recognize and protect major views in the city, with particular attention to those of open space and water;
- Policy 1.3: Recognize that buildings, when seen together, produce a total effect that characterizes the city and its districts.
- Policy 1.8: Increase the visibility of major destination areas and other points of orientation.

Urban Design Element Objective 3 calls for "Moderation of major new development to complement the city pattern, the resources to be conserved, and the neighborhood environment." Of particular relevance to this analysis is:

² Pursuant to Planning Code §290, the height and bulk of buildings or structures in an OS (Open Space) Height and Bulk District shall be determined in accordance with the objectives, principles, and policies of the *General Plan*, and no building or structure or addition thereto shall be permitted unless it is in conformity with the *General Plan*. The inclusion of land in an OS Height and Bulk District is intended to indicate its principal or exclusive purpose as open space.

- Policy 3.5: Relate the height of buildings to important attributes of the city pattern and to the height and character of existing development.

The Urban Design Element of the *General Plan* identifies “Street Areas Important to Urban Design and Views” and maps streets based on the quality of their views. The project site is not located along a street segment identified in the *General Plan* for the quality of its views. However, to the north of the project site, Octavia Street between Sutter Street and Lafayette Park is a street segment identified in the *General Plan* for the excellent quality of its views. The Octavia Street view corridor defines and directs a southward view framed by buildings along the east and west sides of Octavia Street through the western portion of the project site.

Housing Element

- Policy 11.5: Ensure densities in established residential areas promote compatibility with prevailing neighborhood character.
- Policy 12.1: Encourage new housing that relies on transit use and environmentally sustainable patterns of movement.
- Policy 13.4: Promote the highest feasible level of “green” development in both private and municipally-supported housing.

Recreation and Open Space Element

- Policy 2.3: Preserve sunlight in public open spaces.

Transportation Element

- Policy 1.2: Ensure the safety and comfort of pedestrians throughout the city.
- Policy 2.1: Use rapid transit and other transportation improvements in the city and region as a catalyst for desirable development, and coordinate new facilities with public and private development.
- Policy 12.1: Develop and implement strategies which provide incentives for individuals to use public transit, ridesharing, bicycling and walking to the best advantage, thereby reducing the number of single occupant auto trips.

Japantown Cultural Heritage and Economic Sustainability Strategy

The *General Plan* also includes area plans, each of which focuses on a particular area of the City. There is no adopted area plan that includes the project site; however, the project site is within the project area of a planning study entitled the *Japantown Cultural Heritage and Economic Sustainability Strategy* (JCHESS). On July 10, 2013, community stakeholders, the Planning Department, and the Office of Economic and Workforce Development published the Final Draft

Japantown Cultural Heritage and Economic Sustainability Strategy.³ On October 1, 2013, the San Francisco Board of Supervisors endorsed the recommendations of the JCHESS.

The JCHESS study area encompasses a 20-block area bounded by Steiner Street on the west, California Street on the north, Gough Street on the east, and O'Farrell Street, Ellis Street, and Geary Boulevard on the south. The project site at 1481 Post Street/1333 Gough Street is within the JCHESS study area. The JCHESS effort is unique in San Francisco in that the economic and community development strategies focus heavily on the preservation and promotion of the neighborhood's cultural heritage. While the overall focus of most aspects of JCHESS is on cultural heritage and economic sustainability and is outside the scope of typical topics of a neighborhood or land use plan, the JCHESS recommends land use planning strategies to those ends, including amending the existing NC-2 (Small-Scale Neighborhood Commercial) and NC-3 (Moderate-Scale Neighborhood Commercial) Districts in the study area by creating a "named" Japantown NC District. A Planning Code amendment could include modifications to existing land use controls related to the types of uses permitted; requirements for ground-floor commercial use on NC-designated parcels; and revisions to residential density limits.⁴ The JCHESS also recommends adoption of Japantown-specific design guidelines in order to "encourage culturally relevant architecture in new building/site designs and in renovations and additions to older buildings/sites," and recommends improvements to Peace Plaza and Buchanan Mall.⁵

SAN FRANCISCO PLANNING CODE

The Planning Code governs permitted uses, densities, and the configuration of buildings within San Francisco. Permits to construct new buildings or to alter or demolish existing ones may not be issued unless the proposed project complies with the Planning Code or an exception, modification, or variance is granted. The Planning Code requirements that are applicable to the proposed project include, but are not limited to, the provisions of § 132: Front Setbacks; § 134: Rear Yards; § 140: Dwelling Unit Exposure; § 151: Required Off-Street Parking Spaces; § 152: Required Off-Street Freight Loading Spaces; § 155.5: Bicycle Parking Required for Residential Uses; § 166: Car Sharing; § 209.1: Dwellings; § 253: Proposed Buildings and Structures Exceeding a Height of 50 Feet in RM Districts; § 295: Height Restrictions on Structures

³ Japantown Organizing Committee, San Francisco Planning Department, and the Office of Economic and Workforce Development, *JCHESS Japantown Cultural Heritage and Economic Sustainability Strategy*, Final Draft, July 10 2013. This document is available for review on the Planning Department's website at http://www.sf-planning.org/ftp/files/plans-and-programs/in-your-neighborhood/japantown/JCHESS_FinalDraft_07-10-13.pdf, Accessed on April 4, 2014.

⁴ JCHESS, p. 66.

⁵ JCHESS, p. 67-69.

Shadowing Properties Under the Jurisdiction of the Recreation and Park Commission; and § 415: Affordable Housing.⁶

ZONING MAPS

The Zoning Maps establish height and bulk limits for all properties in San Francisco. As shown on Zoning Map HT02, the project site is in a 240-E Height and Bulk District. The maximum building height is 240 feet, and bulk controls are effective above a building height of 65 feet.

IMPACTS AND MITIGATION MEASURES

SIGNIFICANCE THRESHOLDS

The thresholds for determining the significance of impacts in this analysis are consistent with the environmental checklist in Appendix G of the State *CEQA Guidelines*, which has been adopted and modified by the San Francisco Planning Department. For the purpose of this analysis, the following applicable thresholds were used to determine whether implementing the project would result in a significant land use impact. Implementation of the proposed project would have a significant effect on land use and land use planning if the project would:

- 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; or
- Have a substantial impact upon the existing character of the vicinity.

PROJECT FEATURES

The proposed project consists of the construction of a new 36-story, 398-foot-tall (416 feet tall including an 18-foot-tall mechanical penthouse), residential high-rise tower. The proposed project includes a mix of residential, retail, health club, open space, and parking uses. In addition, the proposed project includes a request to reclassify the height and bulk limits for the

⁶ The proposed 1481 Post Street building would be approximately 82 feet from The Sequoias tower and approximately 40 feet from the existing 1333 Gough Street building (see **Figure 2.10**, on p. 2.18). Unlike in Downtown Zoning Districts, RM-4 Districts do not have any regulations that govern the separation of towers. The regulations that govern the spacing between buildings on the same block within RM-4 districts are the front setback, side setback, open space, rear yard and dwelling unit exposure requirements of the Planning Code. The proposed project does not comply with the minimum rear yard and dwelling unit exposure requirements. The project sponsor seeks exceptions to these requirements through a modification of the prior approval of a Planned Unit Development under Planning Code Section 304.

project site from 240-E to 410-G (maximum building height of 410 feet and bulk controls effective above a building height of 80 feet).

IMPACT EVALUATION

Impact LU-1: The proposed project would not conflict with *General Plan* objectives and policies, adopted for the purpose of avoiding or mitigating an environmental effect under CEQA. (*Less than Significant*)

The proposed project is within a 240-E Height and Bulk District. The proposed project, at a height of 398 feet (a 416-foot-tall building including an 18-foot-tall mechanical penthouse), would not conform to the existing 240-foot height limit for the project site (an increase of 158 feet, or 66 percent taller than the existing 240-foot height limit). Additionally, with a horizontal dimension of 118 feet diagonally, the proposed project would not conform to the existing “E” bulk district’s 110-foot limitation on horizontal dimension (above 65 feet in height) by 8 feet (about 7.3 percent).

Although the height and bulk limitations on the project site may have been originally adopted for the purpose of avoiding or mitigating physical environmental impacts of new development, Public Resources Code §21099 (which became effective January 1, 2014) eliminates the analysis of aesthetics from the environmental review process for projects in transit priority zones, such as the proposed project. The topic of aesthetics may no longer be considered in determining the significance of this project’s physical environmental effects under CEQA. Likewise and for the same reasons, insofar as impacts resulting from the proposed project’s conflict with height and bulk limitations are premised on underlying aesthetic concerns (such as impacts on visual and scenic resources, public views, urban design, and visual character and quality), such impacts are not considered significant impacts under Public Resources Code §21099.

The proposed project’s conflict with the existing height and bulk limitations, and its conflict and/or conformity with underlying *General Plan* Urban Design Element objectives and policies, will continue to be analyzed and considered as part of design review for the proposed project by the decision-makers during their deliberations on the merits of the proposed project and as part of their actions to approve, modify, or disapprove the proposed project.

Other physical environmental impacts that could result from the proposed project’s conflict with the existing height and bulk limitations on the project site are discussed in **Section 4.F, Wind and Shadow**.

Impact LU-2: The proposed project would not have a substantial impact on the existing character of the vicinity. (*Less than Significant*)

Physical Development Character

The proposed project, at 36 stories and 398 feet tall (416 feet tall including an 18-foot-tall mechanical penthouse), would be substantially taller than surrounding development, including the 2- to 12-story development along the north side of Post Street, nearby high-rise towers (including the 270-foot-tall Sequoias [about 304 feet tall with rooftop mechanical penthouse]), the 236-foot-tall Cathedral Hill Tower at 1200 Gough Street, and the 190-foot-tall Carillon Tower at 1100 Gough Street), and the 190-foot-tall St. Mary's Cathedral.

As discussed above on pp. 4.B.1-4.B.6, the existing physical development character of the project site and its surroundings is varied. Building height, scale, siting, massing, architectural character, and age do not conform to any strongly discernible overall pattern. Implementation of the proposed project would place a new 398-foot-tall (416 feet tall including an 18-foot-tall mechanical penthouse), vertically-oriented tower within this varied arrangement of buildings on Cathedral Hill. See **Figure 2.19** on p. 2.36, **Figure 2.20** on p. 2.37, **Figure 2.21** on p. 2.38, and **Figure 2.22** on p. 2.39.

The proposed 1481 Post Street tower would be contemporary in architectural vocabulary. The overall volume of the tower shaft would be broken down into vertical subvolumes. Contrasting façade cladding systems and materials (glazed curtain walls with metal mullions, and masonry-clad piers and spandrels) are intended to further emphasize the verticality of the tower and to provide depth, texture, and visual variety to the tower façade. The proposed project would increase and contribute to the existing variety of forms and features that characterizes existing development on Cathedral Hill.

As discussed above, the building site of the proposed 1481 Post Street building is occupied by a ½- to 1-story parking garage structure with rooftop pool and tennis courts. Implementation of the proposed project would transform the physical development character of the project site. See **Figure 2.23** on p. 2.40, **Figure 2.24** on p. 2.41, and **Figure 2.25** on p. 2.42. The proposed project would replace the existing parking garage structure with features intended to enhance the pedestrian environment along Post Street and Geary Boulevard, like a café and garden along Post Street, and ground-floor transparency at the proposed 1481 Post Street building base and 1333 Gough Street pool addition.

Implementation of the proposed project would result in a prominent new physical presence within the project site and its surroundings. The proposed project includes features that are intended to contribute visual interest and variety to the Cathedral Hill setting, an area characterized by a varied character of development. The proposed project would also include features intended to

improve the pedestrian environment. For these reasons, the proposed project would have a less-than-significant impact on the existing physical development character of the site and its surroundings. No mitigation measures are necessary.

Land Use Character

The project site is in an RM-4 (Residential, Mixed, High Density) District. Planning Code § 206.2 describes RM-4 Districts as follows:

These districts are devoted almost exclusively to apartment buildings of high density, usually with smaller units, close to downtown. Buildings over 40 feet in height are very common, and other tall buildings may be accommodated in some instances. Despite the intensity of development, distinct building styles and moderation of facades are still to be sought in new development, as are open areas for the residents. Group housing is especially common in these districts, as well as supporting nonresidential uses.

The project vicinity is an urban, mixed-use, primarily residential neighborhood characterized by a mixture of houses and apartment buildings reflecting a wide range of residential densities. As discussed in Environmental Setting, on pp. 4.B.1-4.B.6, there are residential uses to the north, east, south, and west of the project site. There are retail uses to the west at the Japan Center and to the east along Van Ness Avenue. The retail uses include health clubs at 1000 Van Ness Avenue (Studiosix) and 1200 Van Ness Avenue (24-Hour Fitness).

The eastern portion of the project site is currently occupied by 1333 Gough Street, a 14-story, 138-foot-tall, 214,400-gsf apartment building containing 169 dwelling units and a 4,700-gsf private fitness center. In total, there are 176 parking spaces on the project site within an existing parking structure and within two surface parking lots in the northeast and southeast corners of the project site. The existing parking structure includes two rooftop tennis courts for the existing fitness center and common and private open space for residents of the existing 1333 Gough Street building.

The proposed project would introduce new residential units and a new retail use (café) to the project site and would intensify an existing health club use on the project site. Implementation of the proposed project would not introduce any land uses that do not already exist in the project vicinity. The proposed uses would be compatible with existing uses on the project site and with surrounding uses in the vicinity and would not fundamentally alter the land use character of the project vicinity by introducing incompatible land uses.

The immediate vicinity includes a wide range of residential densities from single-family houses at the northwest corner of Post and Gough streets to the 300-unit high-rise apartment complex at the adjacent Sequoias. The proposed project would substantially increase the existing residential

4. Environmental Setting, Impacts, and Mitigation
B. Land Use and Land Use Planning

density on the project site from the existing 169 units to a total of 431 units on the project site (an increase of 262 units or 155 percent over the existing dwelling unit density on the project site). Planning Code § 209.1(l) principally permits a total of 404 units on the project site, at one unit for every 200 square feet of lot area in an RM-4 District ($80,864 \text{ sq. ft. lot} / 200 = 404 \text{ units}$). The proposed project would exceed the 404 principally permitted units on the project site by 27 units (6.7 percent over what is principally permitted on the project site under Planning Code § 209.1(l)). Planning Code § 304(d)(4) could potentially allow up to 645 units on the project site, at one unit for every 125 square feet of lot area ($80,864 \text{ sq. ft. lot} / 125, \text{ less on unit} = 645$) with approval of a PUD.

The new building on the western portion of the project site would change the residential density of the site and its surroundings to one that is substantially denser than now exists. With implementation of the proposed project, the project site would likely be among the densest residential site within the Cathedral Hill neighborhood. The potential intensification of residential use beyond what is principally permitted in an RM-4 District is permitted by Planning Code § 304, which provides for PUD review approval of modifications from dwelling unit density (among other exceptions) subject to the criteria and limitations set forth under Planning Code § 304(d). The intensification of uses over time is a commonly expected and experienced consequence of urban growth in San Francisco, particularly along or near mass transit corridors such as Geary Boulevard and Van Ness Avenue where there are plans for substantial public investment in transit infrastructure.

The proposed project's residential and commercial uses are not anticipated to conflict with existing uses on the site or with the land use character of the project vicinity as articulated in Planning Code § 206.2 in the description of RM-4 districts. The potential increase in residential density on the project site above that which is principally permitted is anticipated under the PUD process subject to the criteria and limitations of Planning Code § 304(d). For these reasons, the proposed project would not have a substantial adverse impact on the land use character of the vicinity. This impact would be less than significant, and no mitigation measures are necessary.

The physical impacts of increasing the intensity of land uses on the project site are manifest in environmental impacts such as those related to Population and Housing, Greenhouse Gas Emissions, Recreation, Utilities and Service Systems, and Public Services. These are discussed in the NOP/Initial Study (**Appendix A** to this EIR). Environmental impacts related to intensification of land use are also analyzed in **Section 4.C, Transportation and Circulation**, **Section 4.D, Noise**, and **Section 4.E, Air Quality**.

Cumulative Impacts

Impact C-LU-1: The proposed project in combination with past, present, or reasonably foreseeable future projects would not contribute considerably to significant cumulative land use impacts related to (a) conflicts with applicable land use plans and policies adopted for the purpose of avoiding or mitigating an environmental effect, or (b) substantial impacts on the existing character of the site vicinity. (*Less than Significant*)

As discussed on pp. 4.A.5-4.A.6, many of the environmental topics in this EIR use a plan-based approach for cumulative impacts analysis, but when appropriate, certain topics use a list-based approach. For the analysis of cumulative land use impacts, it is appropriate to use a plan-based approach that also accounts for a list of reasonably foreseeable future projects near the project site. These reasonably foreseeable future projects could introduce land uses that physically affect the community in which the project site is located. The reasonably foreseeable future projects near the project site that were considered for the analysis of cumulative land use impacts are discussed on pp. 4.A.6-4.A.7.

This cumulative development is not expected to conflict with any land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, the proposed project would not combine with other cumulative development to cause a significant cumulative impact related to conflicts with plans adopted to avoid an environmental effect.

Implementation of the proposed project, in combination with past, present, and reasonably foreseeable future projects, would introduce residential, commercial, and institutional uses that already exist in the project vicinity. This cumulative development would intensify the existing mixed-use, primarily residential land use character of the project vicinity by introducing new uses that are denser than the uses that they would replace, but it would not fundamentally alter the land use character of the project vicinity by introducing incompatible land uses, such as industrial uses. As a result, this cumulative development would not cause a significant cumulative impact on the land use character of the project vicinity.

Cumulative uses and residential densities are within the range of uses and densities contemplated in the *General Plan* and the Planning Code. Additionally, the proposed project in combination with past, present, and reasonably foreseeable future projects would be consistent with local and regional growth projections, such as *Projections and Priorities 2009*, published by the Association of Bay Area Governments, and adopted planning documents, such as the 2009 Update of the Housing Element of the *San Francisco General Plan*. The proposed project would add 262 market rate units and would help the City meet its regional housing needs. (See **Appendix A** to this EIR, NOP/IS, Section E.3, Population and Housing, pp. 47-51.)

4. Environmental Setting, Impacts, and Mitigation
B. Land Use and Land Use Planning

Approval of the proposed project provides no basis for assuming that there would be an increase in future development in the project vicinity beyond that already anticipated in the City's growth projections and accounted for in the various analyses in this document. See **Section 5.A, Growth-Inducing Impacts**, on pp. 5.1-5.3. As discussed under Impact LU-2 above, the intensification of uses over time is a commonly expected and experienced consequence of urban growth in San Francisco, particularly along or near mass transit corridors such as Geary Boulevard and Van Ness Avenue where there are plans for substantial public investment in transit infrastructure.

For these reasons, the proposed project in combination with past, present, and reasonably foreseeable future projects would have less-than-significant cumulative land use impacts. The proposed project would not make a cumulatively considerable contribution to a significant cumulative land use impact, and no mitigation measures are necessary.

Some of the primary physical effects of cumulative development would be an increase in population, an increase in demand for housing, and an increase in traffic that could lead to noise, air quality, and climate change effects. The effects of cumulative development on population and housing and on climate change are addressed in the Initial Study (see **Appendix A**, pp. 47-53 and pp. 70-86, respectively). The effects of cumulative development on transportation and circulation, noise, and air quality are analyzed in **Section 4.C, Transportation and Circulation**, **Section 4.D, Noise**, and **Section 4.E, Air Quality**, respectively.

C. TRANSPORTATION AND CIRCULATION

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 *2002 Transportation Impact Analysis Guidelines for Environmental Review (SF Guidelines 2002)*.¹ The TIS examined project impacts on local and regional roadways, transit, pedestrians, bicycles, loading, and emergency vehicle access as well as the impacts of construction activities. The parking demand analysis is presented for informational purposes in this EIR. All of these transportation subtopics were considered in the discussions of existing conditions; Existing plus Project, Variant A, Variant B, and Variant C conditions; and Year 2040 cumulative conditions.

The proposed project and its variants include the same land uses on the project site and were therefore evaluated together. The differences between the proposed project and its variants are limited to the provision of wider sidewalks resulting in an increase in the number of on-street parking spaces that would be eliminated, and changes to the widths and locations of proposed driveways resulting in different vehicular ingress and egress patterns.

ENVIRONMENTAL SETTING

The project site is located within a developed urban area on the south side of Post Street near the intersection of Post and Gough Streets on Cathedral Hill, at the eastern edge of the Japantown neighborhood, in the City's Western Addition. It is a single lot bounded by Post Street on the north, Gough Street on the east, Geary Boulevard on the south, and its west property line. The project site is currently occupied by an existing multi-family residential building (1333 Gough Street) with 169 residential units; common and private open space; a parking structure; two surface parking lots; and a private, members-only fitness center. Fitness center membership is open to residents of 1333 Gough Street and to non-residents. The fitness center includes exercise facilities in the 1333 Gough Street building and outdoor tennis courts (accessible through the building lobby entrance) and a swimming pool building (now closed) atop the parking structure. Vehicular ingress to and egress from on-site parking is provided via two existing two-way, 27-foot-wide driveways at the northeast and southeast corners of the project site along Gough Street as well as from an existing two-way, 20-foot-wide driveway along Geary Boulevard at the southeast corner of the project site.

¹ LCW Consulting, *1333 Gough St/1481 Post St Transportation Impact Study, Case No. 2005.0679E*, July 29, 2014 (hereinafter referred to as "TIS"). A copy of this document is available for review at the San Francisco Planning Department, 1650 Mission Street, Suite 400, as part of Case File No. 2005.0679E.

The transportation study area is generally two blocks north of the project site, to Bush Street; two blocks east of the project site, to Van Ness Avenue; two blocks south of the project site, to Ellis Street; and three blocks west of the project site, to Webster Street. The study area and the ten intersections analyzed in the TIS are shown in **Figure 4.C.1: Transportation Study Area and Intersections Analyzed**.

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: United States Highway 101 (U.S. 101), Interstate 80 (I-80), and Interstate 280 (I-280). The project site is accessible by local streets with connections to and from these regional freeways.

I-80 provides regional access to and from the East Bay. The San Francisco-Oakland Bay Bridge is part of I-80 and connects San Francisco with the East Bay and points east. I-80 is located south of the study area, generally between Harrison and Bryant streets. I-80 and U.S. 101 have an interchange less than 1 mile south of the project site. The closest access to and from the project site from I-80 is via U.S. 101 and the on- and off-ramps at Market Street and Octavia Boulevard.

U.S. 101 provides regional access to and from the North Bay and Peninsula/South Bay. U.S. 101 connects San Francisco and the North Bay via the Golden Gate Bridge. Access to the Peninsula/South Bay is provided via U.S. 101 and I-280, which have an interchange approximately 4 miles south of the project site. Van Ness Avenue serves as U.S. 101 between Market Street and Lombard Street (see description of Van Ness Avenue below under “Local Access”). The closest access to U.S. 101 in the northbound direction is via Van Ness Avenue or Franklin Street, which continues to the Golden Gate Bridge via Lombard Street, Richardson Avenue and Presidio Parkway/Doyle Drive. The closest access to U.S. 101 in the southbound direction is via the on-ramp at Market Street and Octavia Boulevard.

I-280 provides regional access from the South of Market area of downtown San Francisco to southern San Francisco, the Peninsula, and the South Bay. I-280 and U.S. 101 have an interchange approximately 4 miles south of the project site. The closest access to and from the project site from I-280 is via U.S. 101 and the on- and off-ramps at Market Street and Octavia Boulevard.

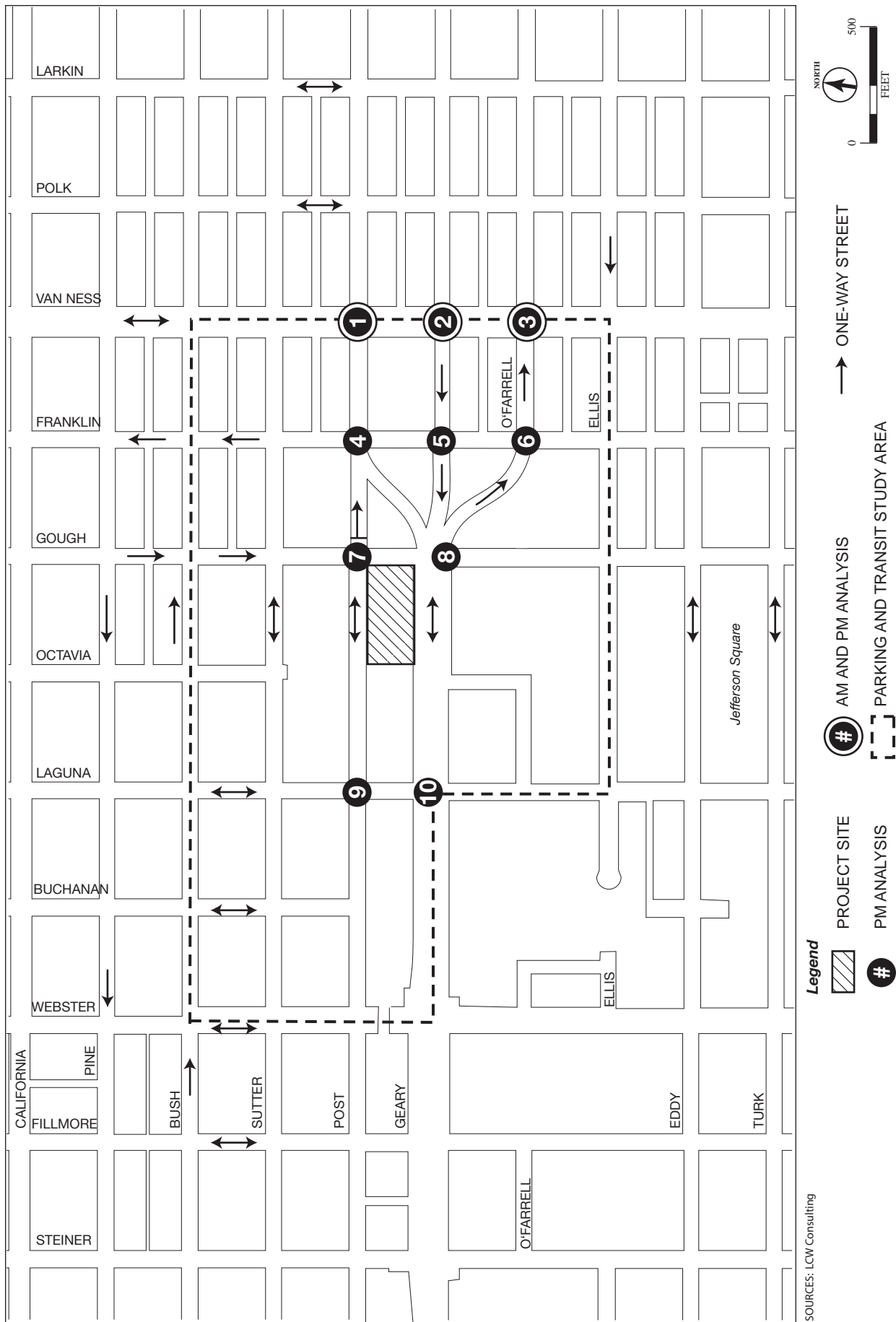


FIGURE 4.C.1: TRANSPORTATION STUDY AREA AND INTERSECTIONS ANALYZED

Local Access

This section describes the existing local roadway system in the vicinity of the project site, including the roadway designation, number of travel lanes, and traffic flow directions.

Gough Street is one-way, southbound-only arterial south of Sacramento Street connecting Lombard Street (U.S. 101 from the Golden Gate Bridge) and Market Street, and forms a one-way couplet with Franklin Street (which operates northbound-only). Gough Street has three travel lanes, and parking on both sides of the street. At the intersection of Gough Street/Geary Boulevard, southbound left turn lanes from Gough Street onto Geary Boulevard are not permitted. The *San Francisco General Plan (General Plan)* identifies Gough Street as a Major Arterial in the Congestion Management Program (CMP) Network, part of the Metropolitan Transportation System (MTS) Network, and as a Neighborhood Commercial Street between Golden Gate Avenue and Market Street.

Post Street is an east-west direction roadway that runs between Presidio Avenue and Market Street. Between Presidio Avenue and Steiner Street, Post Street has one travel lane in each direction. Between Steiner and Gough streets, Post Street has two eastbound travel lanes and one westbound travel lane. East of Gough Street, Post Street is one-way eastbound with two mixed-flow travel lanes and a bus-only lane and forms a couplet with Sutter Street (which runs one-way westbound between Market and Gough streets). On-street parking is generally permitted on both sides of the street. The *General Plan* identifies Post Street as a Transit Preferential Street (secondary transit street). Post Street is identified as a Neighborhood Pedestrian Street between Market and Gough streets, between Laguna and Fillmore streets, and between Pierce and Divisadero streets. Bicycle Route 16 runs eastbound/westbound with bicycle lanes on either side of Post Street between Presidio Avenue and Steiner Street, and westbound between Market and Steiner streets as a signed route only.

Geary Boulevard is an east-west direction major thoroughfare, linking downtown with the Richmond district. Between 48th Avenue and Collins Street, this roadway is designated as Geary Boulevard and generally has three travel lanes in each direction. Between Collins and Gough streets, this roadway is designated as Geary Expressway and is generally an eight-lane, two-way roadway. East of Gough Street, this roadway becomes Geary Street and is one-way westbound, forming a couplet with O'Farrell Street. On Geary Street east of Gough Street, the right curb lane is a bus-only lane. Between Gough and Franklin streets, Geary Street is also called Starr King Way. The *General Plan* identifies Geary Street as a Major Arterial in the CMP Network, part of the MTS Network, a Transit Preferential Street (transit-important), and a Neighborhood Commercial Street.

O'Farrell Street is an east-west street that runs discontinuously between Grant and Masonic avenues. In the vicinity of the project site, O'Farrell Street runs one-way eastbound east of Franklin Street with two mixed-flow travel lanes and a bus-only lane, and parking on both sides of the street.

Franklin Street is a one-way, northbound-only arterial connecting Market Street to Lombard Street (U.S. 101 to the Golden Gate Bridge), and forms a one-way couplet with Gough Street (which operates southbound-only south of Sacramento Street). Franklin Street generally has three to four travel lanes (four travel lanes when peak period tow-away restrictions are in effect²), and parking on both sides of the street. The *General Plan* identifies Franklin Street as a Major Arterial in the CMP Network, part of the MTS Network, and as a Neighborhood Commercial Street between Golden Gate Avenue and Market Street.

Van Ness Avenue is the major north-south arterial in the central section of San Francisco. The roadway is part of U.S. 101 between Lombard Street and the Central Freeway (via South Van Ness Avenue). In the vicinity of the project site, Van Ness Avenue has three travel lanes in each direction separated by a center median, and metered parking on both sides of the street. Left turns from Van Ness Avenue are limited; in the project vicinity southbound left turns are permitted at Clay, Bush, and O'Farrell streets, and northbound left turns are permitted at Geary, Pine and Sacramento streets. The *General Plan* identifies Van Ness Avenue as a Major Arterial in the CMP Network, part of the MTS Network, a Primary Transit Street (transit important), part of the Citywide Pedestrian Network, and a Neighborhood Commercial Street.

Octavia Street is a north-south street that runs discontinuously between Bay and Market streets. In the vicinity of the project site, Octavia Street runs between Sutter and Sacramento streets, and has one travel lane in each direction and on-street parking on both sides of the street. South of Geary Boulevard, Cleary Court is a local street that runs as a two-block access roadway within the Octavia Street and O'Farrell Street rights-of-way, connecting Laguna Street and Geary Boulevard. It has one travel lane in each direction and on-street parking on both sides of the street. Cleary Court access at Geary Boulevard eastbound is right-turn-in and right-turn-out. South of Hayes Street, Octavia Street has been reconstructed as part of Octavia Boulevard between Market and Fell streets (three lanes in each direction), while between Fell and Hayes streets, Octavia Street is part of the Hayes Green, and a local access lane and on-street parking is

² From Geary Boulevard north to Sacramento Street parking is prohibited on weekdays on the west side of the street between 4 PM and 7 PM. South of Geary Boulevard to Ellis Street parking is prohibited on weekdays on the east side of the street between 4 PM and 6 PM and on the west side between 4 PM and 7 PM. Between Ellis and Eddy streets parking is prohibited on weekdays on both sides of the street between 4 PM and 6 PM. South of Eddy Street to Golden Gate Avenue parking is prohibited on weekdays on the west side of the street between 4 PM and 6 PM.

provided in each direction for the entire segment between Market and Hayes streets. Between Fulton and Market streets, Octavia Street and Octavia Boulevard are parts of Bicycle Route 45.

Sutter Street is an east-west street that runs between Presidio Avenue and Market Street. It is one-way westbound between Market and Gough streets, and forms a couplet with Post Street (which runs one-way eastbound east of Gough Street). The one-way segment of Sutter Street has three travel lanes in the westbound direction. West of Gough Street, Sutter Street is a two-way street with two travel lanes westbound and one travel lane eastbound between Gough and Webster streets, and one travel lane in each direction between Webster Street and Presidio Avenue. The *General Plan* identifies Sutter Street as a Transit Conflict Street in the CMP Network, and as a Transit Preferential Street (secondary transit street). Sutter Street is identified as a Neighborhood Pedestrian Street between Market and Fillmore streets, and between Scott and Divisadero streets. Bicycle Route 16 runs westbound on Sutter Street east of Steiner Street.

Laguna Street is a north-south street that runs between Beach and Market streets. Laguna Street has one travel lane in each direction, and on-street parking on both sides of the street. The *General Plan* identifies Laguna Street as a Transit Preferential (secondary transit street) between Sutter and Post streets. Cleary Court is a local street connecting Laguna Street and Geary Boulevard, across Geary Boulevard from the project site, with one travel lane in each direction and on-street parking on both sides of the street.

Webster Street is a north-south street that runs between Marina Boulevard and Duboce Avenue. In the vicinity of the project site, Webster Street has two lanes in each direction, and on-street parking on both sides of the street. Webster Street is part of Bicycle Route 345, and in the vicinity of the project site, a bicycle lane is provided in each direction of travel.

Intersection Operating Conditions

Existing operating conditions were evaluated for ten signalized intersections in the vicinity of the project site (see **Figure 4.C.1** on p. 4.C.3), using the *2000 Highway Capacity Manual (2000 HCM)* operations methodology for signalized intersections, which determines the capacity for each lane group approaching the intersection. Each study intersection was analyzed during the weekday PM peak hour conditions. Three of the ten study intersections were also analyzed during the weekday AM peak hour conditions, as noted below, primarily because Van Ness Avenue is part of U.S. 101.

- Van Ness Avenue/Post Street (AM and PM peak hours)
- Van Ness Avenue/Geary Boulevard (AM and PM peak hours)
- Van Ness Avenue/O'Farrell Street (AM and PM peak hours)
- Franklin Street/Post Street (PM peak hour)

- Franklin Street/Geary Boulevard (PM peak hour)
- Franklin Street/O'Farrell Street (PM peak hour)
- Gough Street/Post Street (PM peak hour)
- Gough Street/Geary Boulevard (PM peak hour)
- Laguna Street/Post Street (PM peak hour)
- Laguna Street/Geary Boulevard (PM peak hour)

The operating characteristics of signalized intersections are described by the concept of Level of Service (LOS). LOS is a qualitative description of the performance of an intersection based on the average delay (in seconds per vehicle) for the various movements within the intersection. A combined weighted average delay and LOS are presented for each intersection. Intersection levels of service range from LOS A, which indicates free flow or excellent conditions with short delays, to LOS F, which indicates congested or overloaded conditions with extremely long delays. LOS A through LOS D are considered excellent to satisfactory service levels, LOS E is undesirable, and LOS F conditions are unacceptable. In San Francisco, LOS E and F are considered unacceptable operating conditions for signalized intersections.³

Intersection Level of Service Conditions

Existing intersection operating conditions were evaluated for the weekday PM peak hour conditions (generally between 5 and 6 PM) of the PM peak period (4 to 6 PM). Intersection turning movement volumes at the ten study intersections were counted on Tuesday through Thursday, September 25th to 27th, 2012, and Tuesday, October 2, 2012. In addition, the three study intersections along Van Ness Avenue (i.e., the study intersections of Van Ness Avenue/Post Street, Van Ness Avenue/Geary Boulevard, and Van Ness Avenue/O'Farrell Street), which, as noted above, are part of U.S. 101 were evaluated for weekday AM peak hour conditions (generally between 8 and 9 AM) of the AM peak period (7 to 9 AM).

The results of the intersection LOS analysis for the existing weekday AM and PM peak hour conditions is presented in **Table 4.C.1: Existing Conditions – Weekday AM/PM Peak Hour Intersection LOS**. During the weekday AM and/or PM peak hours all ten study intersections currently operate with acceptable conditions of LOS D or better. Many of the study intersections include one-way north/south and east/west arterials with two to three travel lanes by direction accommodating large numbers of vehicles, and during peak periods traffic signals are coordinated to allow for a progression along these streets. During the weekday PM peak hour, the greatest delay is experienced by vehicles traveling northbound on Franklin Street between Turk Street and Geary Boulevard. Along this section of Franklin Street the uphill grades of 5 to 9 percent (which

³ TIS Appendix D presents more detailed level of service descriptions for signalized intersections.

Table 4.C.1: Existing Conditions – Weekday AM/PM Peak Hour Intersection LOS

Intersection ^a	Weekday AM Peak Hour		Weekday PM Peak Hour	
	Average Vehicle Delay ^b	LOS	Average Vehicle Delay ^b	LOS
1. Van Ness Avenue/Post Street	18.0	B	14.0	B
2. Van Ness Avenue/Geary Boulevard	20.3	C	19.0	B
3. Van Ness Avenue/O'Farrell Street	27.9	C	20.5	C
4. Franklin Street/Post Street	--	--	11.0	B
5. Franklin Street/Geary Boulevard	--	--	36.0	D
6. Franklin Street/O'Farrell Street	--	--	39.2	D
7. Gough Street/Post Street	--	--	17.7	B
8. Gough Street/Geary Boulevard	--	--	39.8	D
9. Laguna Street/Post Street	--	--	13.7	B
10. Laguna Street/Geary Boulevard	--	--	22.9	C

Notes:

^a Intersections are numbered to key with **Figure 4.C.1** on p. 4.C.3.

^b Delay is presented in seconds per vehicle.

Source: LCW Consulting, 2014

affect the acceleration and deceleration capabilities of drivers, resulting in slower travel speeds), and the competing needs for green time⁴ between Franklin Street and major cross-town streets effectively reduce the roadway capacity.

TRANSIT NETWORK

The project site is well served by public transit, with both local and regional service provided in the vicinity. Local transit service is provided by the San Francisco Municipal Railway (Muni) bus routes, which can be used to transfer to other bus routes, cable car lines, the F Market & Wharves historic streetcar line, and Muni Metro light rail lines. Service to and from the East Bay is provided by the San Francisco Bay Area Rapid Transit (BART) system along Market and Mission streets, Alameda-Contra Costa Transit (AC Transit) from the Transbay Terminal, and ferries from the Ferry Building. Service to and from the South Bay and the Peninsula is provided by BART along Market and Mission streets, San Mateo County Transit (SamTrans) from the Transbay Terminal, and the Peninsula Rail Corridor (Caltrain) from King Street Station at Fourth and Townsend streets. Service to and from the North Bay is provided by Golden Gate Transit (GGT) buses along Van Ness Avenue⁵ and at the Transbay Terminal and ferries from the Ferry Building.

⁴ Green time refers to the duration, in seconds, of the green indication for a given movement at a signalized intersection.

⁵ Only alightings are allowed from GGT buses destined to San Francisco from Marin and Sonoma counties. Conversely, only boardings are allowed onto GGT buses destined to Marin and Sonoma counties from San Francisco.

Transit conditions were examined within a study area generally bounded by Bush Street to the north, Van Ness Avenue to the east, Ellis Street to the south, and Laguna and Webster streets to the west.

Local Transit

Muni provides transit service within the City and County of San Francisco, including bus routes (diesel, diesel-hybrid electric, and electric trolley) and cable car, light rail (Muni Metro), and electric streetcar lines. Muni operates a number of bus routes in the vicinity of the project site.

Figure 4.C.2: Existing Transit Network Near Project Site presents the transit service and stop locations 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 4.C.2: Muni Service Weekday Frequency in the Project Vicinity**. The Van Ness Avenue Muni Metro station is located about 1 mile south of the project site (accessed via the 47 Van Ness and the 49 Van Ness-Mission).

Table 4.C.2: Muni Service Weekday Frequency in the Project Vicinity

Route ^a	Service Frequency (minutes)		Nearest Stop Location ^b	
	AM (7 to 9 AM)	PM (4 to 6 PM)	Inbound	Outbound
2 Clement	12	12	Post/Gough	Sutter/Gough
3 Jackson	13.5	12	Post/Gough	Sutter/Gough
22 Fillmore	9	8	Fillmore/Sutter	Fillmore/Sutter
38 Geary	12	8	Starr King/Gough	Geary/Gough
38L Geary Limited	5.5	5.5	Geary/Laguna	Geary/Laguna
47 Van Ness	10	10	Van Ness/Sutter	Van Ness/Sutter
49 Van Ness-Mission	8	8	Van Ness/Sutter	Van Ness/Sutter

Notes:

^a The 76 Marin Headlands bus route also travels along Van Ness Avenue north of Post Street, and on Post and Sutter streets east of Van Ness Avenue; however, service is only provided on Sundays and on some holidays. In addition, the 1AX/1BX California Expresses, 31AX/BX Balboa Expresses, and the 38AX/BX Geary Expresses travel on Pine and Bush streets in the vicinity of the project site, but do not stop.

^b Inbound travel is generally toward the greater downtown area while outbound travel is generally away from the greater downtown area.

Sources: San Francisco Municipal Transportation Agency, 2012; LCW Consulting, 2014

Regional Transit

BART operates regional rail transit service between the East Bay (from Pittsburg/Bay Point, Richmond, Dublin/Pleasanton and Fremont) and San Francisco, and between San Mateo County and San Francisco. Within downtown San Francisco, BART operates underground below Market Street. During the weekday PM peak period, frequencies are about 5 to 15 minutes for each line.

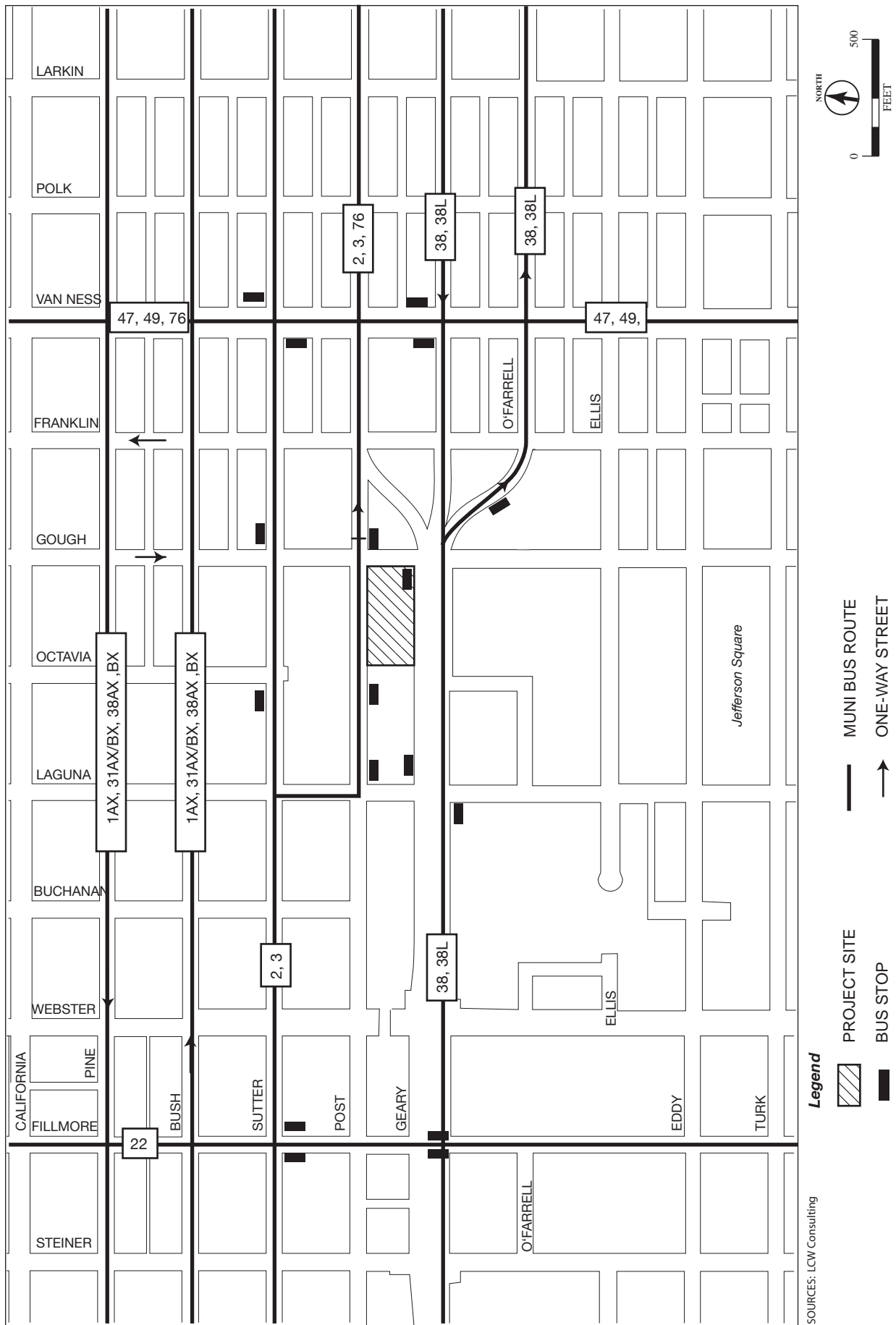


FIGURE 4.C.2: EXISTING TRANSIT NETWORK NEAR PROJECT SITE

1333 GOUGH STREET/1481 POST STREET

4. Environmental Setting, Impacts, and Mitigation

C. Transportation and Circulation

The Montgomery BART/Muni Metro station is located about 1.5 miles east of the project site, while the Powell BART/Muni Metro station is located about 1.2 miles east of the project site.⁶ The Montgomery and Powell Street BART Stations are directly accessible via the 2 Clement, 3 Jackson, 38 Geary and 38L Geary Limited bus routes.

Caltrain provides rail passenger service on the Peninsula between Gilroy and San Francisco. The San Francisco terminal is located at Fourth and Townsend streets, in the South of Market area approximately 2 miles southeast of the project site (accessed via the 47 Van Ness). Caltrain currently operates 92 trains each weekday, with a combination of local, limited stops and Baby Bullet services. Frequencies during the evening peak period are approximately 5 to 30 minutes.

SamTrans provides bus service between San Mateo County and San Francisco. It operates three bus routes that serve downtown San Francisco: the KX (express weekday peak-hour/peak-direction service), the 292 (all day service), and the 397 (limited overnight service). In general, SamTrans service to downtown San Francisco operates along Mission Street to the temporary Transbay Transit Terminal located on Howard Street between Main and Beale streets, approximately 2 miles east of the project site (accessed via the 38 Geary and 38L Geary Limited). SamTrans cannot pick up northbound passengers at San Francisco stops, or drop off southbound passengers boarding in San Francisco within San Francisco.

GGT, operated by the Golden Gate Bridge, Highway, and Transportation District (GGBHTD), provides bus service between the North Bay (Marin and Sonoma counties) and San Francisco. GGT operates 18 commuter bus routes and 5 basic bus routes into San Francisco, several of which operate along Van Ness Avenue. Basic bus routes operate at regular intervals of 30 to 90 minutes depending on the time and day of week. Commute routes operate at more frequent intervals in the mornings and evenings. GGT cannot pick up southbound passengers at San Francisco stops, or drop off northbound passengers boarding in San Francisco within San Francisco.

GGBHTD also operates ferry service between the North Bay and San Francisco. Ferries operate between Larkspur and San Francisco, and between Sausalito and San Francisco, all day, seven days a week. The San Francisco terminal is located at the Ferry Building along the Embarcadero at the foot of Market Street, about 2 miles east of the project site (accessed via the 2 Clement).

AC Transit is the primary bus operator for the East Bay, including Alameda and western Contra Costa counties. AC Transit operates 37 routes between the East Bay and San Francisco, all of which terminate at the temporary Transbay Terminal (accessed via the 38 Geary and 38L Geary Limited). Most Transbay service is peak-hour and peak-direction (to San Francisco during the

⁶ The Civic Center BART/Muni Metro station is located about 1.0 mile east of the project site; however, access via Muni would require a transfer to the 5 Fulton from the 47 Van Ness or 49 Van Ness-Mission.

weekday AM peak period and from San Francisco during the weekday PM peak period), with headways of 15 to 30 minutes per route.

The Water Emergency Transportation Authority (WETA) was charged in 2008 with creating and adopting a Transition Plan for Bay Area ferry service in Senate Bill 1093. As of July 2012, WETA is responsible for operating San Francisco Bay Ferry service that serves Oakland (Jack London Square), Alameda (Harbor Bay and Main Street/Gateway), San Francisco (Downtown Ferry Building and Pier 41), South San Francisco (Oyster Point Marina), and Vallejo. Seasonal service is also provided to Angel Island and AT&T Park.

Capacity Utilization

Muni

Capacity utilization relates the number of passengers per transit vehicle to the design capacity of the vehicle. In contrast to other transit operators, Muni has established a capacity utilization service standard which includes seated and standing capacity, with standing passengers representing somewhere between 30 to 80 percent of seated passengers, depending upon the specific configuration of the transit vehicles.⁷

Table 4.C.3: Existing Muni Ridership/Capacity Utilization – Weekday PM Peak Hour presents the ridership and capacity utilization at the maximum load point (MLP) for the nearby routes during the weekday PM peak hour. For the east-west routes the maximum load points are located to the east of the project site (generally east of Van Ness Avenue), and for the north-south routes the maximum load point is located to the south of the project site. As indicated in **Table 4.C.3**, capacity utilization for all routes is less than Muni's 85 percent capacity utilization standard. However, the capacity utilization of the 2 Clement and 38L Geary Limited in the outbound direction is 82.5 percent and 84.1 percent, respectively, which is approaching the 85 percent capacity utilization standard.

The seven existing Muni routes operating in the vicinity of the project site were grouped into two corridors and the capacity utilization was determined. The Muni routes included in each group are as follows:

- North/South Corridor: 22 Fillmore, 47 Van Ness, and 49 Van Ness-Mission
- East/West Corridor: 2 Clement, 3 Jackson, 38 Geary, and 38L Geary Limited

⁷ The average load during any 15-minute time interval should not exceed 119 passengers for a light rail vehicle, 94 passenger 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 4.C.3: Existing Muni Ridership/Capacity Utilization – Weekday PM Peak Hour

Route	Inbound (towards downtown)		Outbound (away from downtown)	
	Ridership	Capacity Utilization	Ridership	Capacity Utilization
2 Clement	170	54.0%	260	82.5%
3 Jackson	125	39.7%	210	66.7%
22 Fillmore	323	68.3%	308	65.1%
38 Geary	352	46.8%	450	63.8%
38 Geary Limited	556	54.2%	862	84.1%
47 Van Ness	276	73.0%	258	68.3%
49 Van Ness-Mission	353	50.1%	375	53.2%

Sources: San Francisco Planning Department Memorandum – Transit Data for Transportation Impact Studies, June 2013; LCW Consulting, 2014

Table 4.C.4: Muni Corridor Analysis for Existing Conditions – Weekday PM Peak Hour

presents the existing transit passenger load, capacity and capacity utilization at the MLP for the bus routes within the north/south and east/west corridors during the weekday PM peak hour. During the weekday PM peak hour, all corridors are currently operating below the capacity utilization standard of 85 percent, and have available capacity to accommodate additional passengers.

Table 4.C.4: Muni Corridor Analysis for Existing Conditions – Weekday PM Peak Hour

Corridor/Direction of Travel	Hourly Ridership	Hourly Capacity	Capacity Utilization
North/South Corridor^a			
Northbound (inbound)	952	1,556	61.2%
Southbound (outbound)	941	1,556	60.5%
East/West Corridor^b			
Eastbound (inbound)	1,203	2,407	50.0%
Westbound (outbound)	1,782	2,360	75.5%

Notes:

^a The North/South corridor includes the 22 Fillmore, 47 Van Ness and the 49 Van Ness-Mission.

^b The East/West corridor includes the 2 Clement, the 3 Jackson, the 38 Geary, and the 38L Geary Limited.

Sources: San Francisco Planning Department; LCW Consulting, 2014

Regional

Regional transit operations are evaluated at three regional screenlines (East Bay, North Bay, and South Bay) for the peak direction of travel and patronage loads, which correspond with the evening commute in the outbound direction from downtown San Francisco to the region.

Table 4.C.5: Regional Transit Capacity Utilization for Existing Conditions – Weekday PM Peak Hour presents the existing weekday PM peak ridership, capacity, and utilization information for each regional screenline. Approximately 38,300 transit riders currently cross the three regional screenlines during the weekday PM peak hour, with about 60 percent crossing the East Bay screenline, 6 percent crossing the North Bay screenline, and 34 percent crossing the

Table 4.C.5: Regional Transit Capacity Utilization for Existing Conditions – Weekday PM Peak Hour

Screenline/Operator	Weekday PM Peak Hour (Outbound)		
	Hourly Ridership	Hourly Capacity	Capacity Utilization
East Bay			
BART	19,716	22,050	89.4%
AC Transit	2,256	3,926	57.5%
Ferry	805	1,615	49.8%
Subtotal	22,777	27,591	82.6%
North Bay			
GGT buses	1,384	2,817	49.1%
Ferry	968	1,959	49.4%
Subtotal	2,352	4,776	49.2%
South Bay			
BART	10,682	14,910	71.6%
Caltrain	2,377	3,100	76.7%
SamTrans	141	320	44.1%
Subtotal	13,200	18,330	72.0%
Total	38,329	50,697	75.6%

Sources: San Francisco Planning Department Memorandum – Transit Data for Transportation Impact Studies, June 2013; LCW Consulting, 2014

South Bay screenline. All of the regional transit operators have a one-hour load factor standard of 100 percent, which would indicate that all seats are full. As shown in **Table 4.C.5**, during the weekday PM peak hour, all regional transit providers operate at less than their load factor standards, which indicates that seats are generally available and vehicles on average are not severely overcrowded.

PEDESTRIAN CONDITIONS

Pedestrian Network

An evaluation of existing pedestrian conditions was conducted during field visits to the project site on weekdays and weekends. Adjacent to the project site, the sidewalks are 10 feet wide on Post Street, Gough Street, and Geary Boulevard. In the vicinity of the project site most intersections do not have dedicated pedestrian signals. Pedestrian signals are provided at the following five intersections:

- Van Ness Avenue/Geary Boulevard
- Van Ness Avenue/O'Farrell Street
- Franklin Street/O'Farrell Street
- Gough Street/Geary Boulevard (crossing Geary Boulevard, only), and
- Laguna Street/Geary Boulevard (crossing Geary Boulevard, only)

The sidewalk on the northwest corner of the intersection of Gough Street/Geary Boulevard is improved with a pedestrian bulb, which provides a shorter crossing distance across Geary

Boulevard. SFMTA has indicated that it will install a similar pedestrian bulb at the northeast corner of the Gough Street/Geary Boulevard intersection, although timing for installation has not yet been determined. In addition, in late 2014, SFMTA will install pedestrian flashing beacons at the midblock crosswalk on Post Street between Laguna and Gough streets (i.e., at the location of the Octavia Street right-of-way). The flashing beacons will be pedestrian activated and will flash yellow when activated via push buttons. After flashing for a predetermined amount of time, the beacons will turn off until the next activation.

Pedestrian Safety/Hazards Issues

In the vicinity of the project site, pedestrian volumes are very light throughout the day, typically between 50 and 100 pedestrians per hour, and mostly related to trips to and from the bus stops on Post Street and on Geary Boulevard. While pedestrian volumes in the vicinity of the project site are low, because of the senior housing development and health center facility (The Sequoias) immediately adjacent to and west of the project site, a number of the pedestrians are seniors. Seniors have special safety considerations that affect their walking experience including reduction in vision, agility, balance, speed, concentration and strength, difficulties hearing vehicles approaching from behind, and reduced ability under low light/night conditions.⁸ Seniors are more prone to suffer a fatality if involved in a crash when compared to the general population.⁹

A number of senior residents of The Sequoias have expressed concerns regarding existing conditions related to crossing Post Street, Gough Street, and Geary Boulevard, including the midblock crosswalk at the western edge of the project site (east of an existing driveway for The Sequoias). At this location, the length of the crosswalk, which spans two eastbound travel lanes, one westbound travel lane, and a parking lane on each side of the street, combined with the grade change west of the crosswalk, which reduces the ability of drivers to see pedestrians in the crosswalk, poses a safety concern for senior residents in the area. In addition, Bicycle Route 16 (Class III facility - signed bicycle route only) and the 2 Clement and 3 Jackson bus routes run eastbound on Post Street adjacent to the project site. In response to neighborhood concerns and independent of the proposed project, the SFMTA has planned to install pedestrian-activated flashing beacons at this midblock crosswalk, as described above. Additionally, the signalized intersections of Post/Laguna streets and Post/Gough streets, which are the closest intersections to The Sequoias, do not have pedestrian countdown signals, and pedestrians crossing at the intersections of Geary Boulevard/Laguna Street and Geary Boulevard/Gough Street are challenged due to the multiple travel lanes and higher travel speeds on Geary Boulevard.

⁸ Federal Highway Association, FHWA University Course on Bicycle and Pedestrian Transportation, Publication No. FHWA-HRT-05-100, slide 10.

⁹ Loukaitou-Sideris, Anastasia, Is it Safe to Walk? Neighborhood Safety and Security Considerations and Their Effects on Walking, *Journal of Planning Literature*, Vol. 20, No. 3, February 2006, p. 226.

Crosswalk and Level of Service Analysis

Pedestrian conditions were quantitatively assessed at three sidewalk locations adjacent to the project site: Post Street west of Gough Street, Gough Street between Post Street and Geary Boulevard, and Geary Boulevard west of Gough Street. Pedestrian conditions were also quantitatively assessed at the four crosswalks at the Gough Street/Geary Boulevard intersection.

Pedestrian counts at the sidewalk locations were conducted on Thursday, September 27, 2012. Pedestrian counts at the crosswalks at the Gough Street/Geary Boulevard intersection were conducted on Thursday, June 13, 2013. In addition, pedestrians crossing at the midblock crosswalk on Post Street between Laguna and Gough streets were counted on Thursday, September 27, 2012.

The analysis of operating characteristics of the pedestrian sidewalk and crosswalk locations was conducted using the *2000 HCM* methodology. Sidewalk operating conditions are measured by average pedestrian flow rate, which is defined as the average number of pedestrians over a designated period that pass a specific point on the sidewalk (typically, pedestrians per minute per foot). The width of the sidewalk at this point is considered the “effective width,” which accounts for reduction in amount of sidewalk available for travel due to street furniture and the sides of buildings. The level of service for sidewalks is presented for “platoon” conditions, which represents the conditions when pedestrians are walking together in a group. Pedestrian level of service conditions were calculated at the most restrictive location adjacent to the project site.¹⁰ For example, at a sidewalk study location where there are trees located within two feet from the curb in one location, and a bus shelter within five feet from the curb in another location, the pedestrian analysis would be conducted at the location of the bus shelter. On Post Street, Gough Street, and Geary Boulevard, the effective width of the sidewalks is the same for the sidewalk segments adjacent to the project site.

Crosswalk LOS is a measurement of the amount of space (square feet) each pedestrian has in the crosswalk or corner. These measurements depend on pedestrian volumes, signal timing, crosswalk dimensions and roadway widths. With the *2000 HCM* methodology, an upper limit for acceptable conditions is LOS D, which equals approximately 15 pedestrians per minute per foot for walkways, and 15 to 24 square feet per pedestrian for crosswalks and corners. LOS E or LOS F would represent congested conditions. At LOS E normal walking gaits are frequently adjusted due to congested conditions and independent movement is difficult, and at LOS F walking speeds are severely restricted.

Table 4.C.6: Existing Pedestrian Level of Service - Weekday AM, Midday, and PM Peak Hours presents the pedestrian analysis results for the weekday AM, midday, and PM peak hour

¹⁰ TIS, pp. 47-51.

conditions. The pedestrian levels of service for the sidewalk locations and crosswalks are LOS A or LOS B for all three peak hours. The most constrained sidewalk location adjacent to the project site is on Geary Boulevard at the Muni bus shelter west of the existing 20-foot-wide driveway, and during all three peak hours, the sidewalk conditions are LOS B.

Table 4.C.6: Existing Pedestrian Level of Service - Weekday AM, Midday, and PM Peak Hours

Analysis Locations	Pedestrians Per Hour	Level of Service	
		Measure of Effectiveness (ped/min/ft) ^a	LOS
SIDEWALKS			
Weekday AM Peak Hour			
Post Street	42	0.3	A
Geary Boulevard	61	0.6	B
Gough Street	82	0.54	A
Weekday Midday Peak Hour			
Post Street	75	0.5	A
Geary Boulevard	60	0.7	B
Gough Street	54	0.3	A
Weekday PM Peak Hour			
Post Street	82	0.5	A
Geary Boulevard	111	1.0	B
Gough Street	78	0.3	A
CROSSWALKS			
(Gough Street/Geary Boulevard)	Pedestrians Per Hour	Level of Service	
		Measure of Effectiveness (sq ft/ped) ^b	LOS
Weekday AM Peak Hour			
North	40	518	A
South	55	377	A
East	76	294	A
West	45	532	A
Weekday Midday Peak Hour			
North	74	176	A
South	56	234	A
East	67	270	A
West	47	418	A
Weekday PM Peak Hour			
North	83	289	A
South	54	449	A
East	79	228	A
West	63	311	A

Notes:

^a ped/min/ft = pedestrians per minute per foot

^b sq ft/ped = square feet per pedestrian

Source: LCW Consulting, 2014.

Overall, the sidewalks and crosswalks were observed to be operating under satisfactory conditions, with pedestrians moving at normal walking speeds and with freedom to bypass other pedestrians. As noted above, the SFMTA has planned improvements in the project vicinity to enhance pedestrian conditions, including a pedestrian bulb at the northeastern corner of the

Gough Street/Geary Boulevard intersection, and pedestrian flashing beacons at the midblock crosswalk on Post Street between Laguna and Gough streets.

BICYCLE CONDITIONS

In the vicinity of the project site, Sutter, Post, Webster and Polk streets are designated Citywide Bicycle Routes. These routes are interconnected to the Citywide Bicycle Network and provide access to and from the study area from locations throughout the city. **Figure 4.C.3: Bicycle Route Network in Study Area** presents the bicycle route network in the vicinity of the project site.

Bikeways are typically classified as Class I, Class II, or Class III facilities.¹¹ Class I bikeways are bike paths with exclusive right-of-way for use by bicyclists or pedestrians. Class II bikeways are bike lanes striped with the paved areas of roadways and established for the preferential use of bicycles, while Class III bikeways are signed bike routes that allow bicycles to share travel lanes with vehicles.

- Bicycle Route 16 runs westbound along Sutter Street and eastbound on Post Street. On Post Street, Route 16 is a Class II facility in both directions of travel between Presidio Avenue and Steiner Street, and a Class III facility to the east of Steiner Street.
- Bicycle Route 345 runs in both directions along Webster Street between Sutter and Hermann streets (one block north of Duboce Avenue). Route 345 is a Class II facility between Sutter and Grove streets, and a Class III facility between Grove and Hermann streets.
- Bicycle Route 25 runs northbound and southbound along Polk Street between Beach and Market streets with segments running as Class II or Class III facilities. A Class II facility is provided in the southbound direction between Post and Market streets, in the southbound direction between Beach and Lombard streets, and in both directions between Union and Lombard streets. A Class III facility is provided on the remaining segments of Polk Street. The SFMTA recently implemented a northbound contraflow bicycle lane on Polk Street between Market and McAllister streets (Project 3-4 in the *San Francisco Bicycle Plan*). In addition, SFMTA efforts for bicycle lane improvements on Polk Street between Union and McAllister streets have been finalized (see discussion of the Polk Street Improvement Project below under “Cumulative Bicycle Impacts” on pp. 4.C.77-4.C.78).¹²

¹¹ Bicycle facilities are defined in the California Streets and Highway Code §890.4.

¹² SFMTA, Polk Street Improvement Project – Overview. Available online at <http://www.sfmta.com/projects-planning/projects/polk-street-improvement-project>. Accessed March 25, 2014.

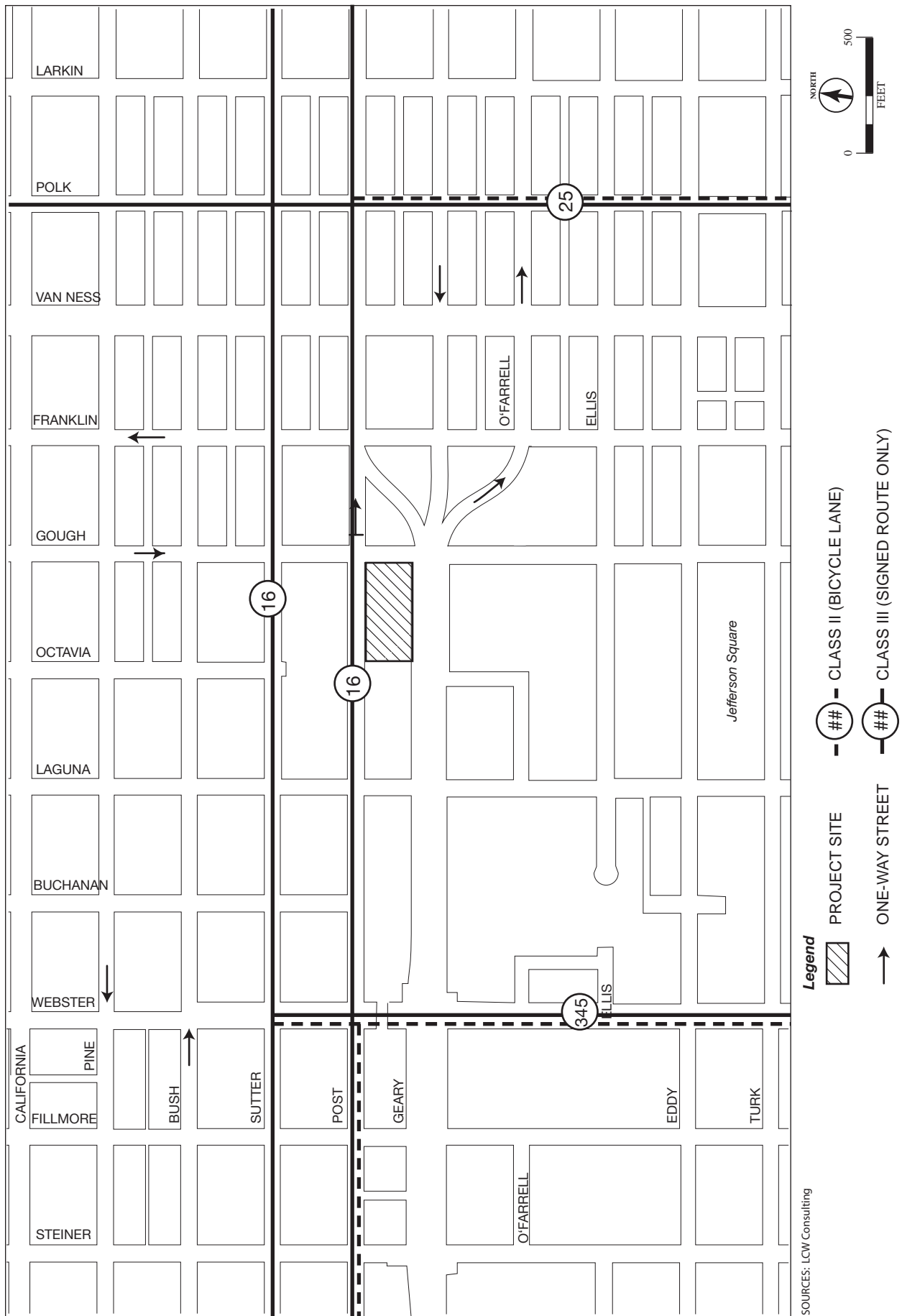


FIGURE 4.C.3: BICYCLE ROUTE NETWORK IN STUDY AREA

During field surveys bicyclists were observed to be riding in the vicinity of the project site along Post and Webster streets west of the project site. Bicyclists traveling on Post Street were counted on Tuesday, September 27, 2012 during the weekday AM and PM peak periods. Bicyclists primarily travel eastbound on Post Street, although one to two bicyclists per hour were observed riding westbound. Approximately 50 bicyclists were counted riding eastbound during the weekday AM peak hour and approximately 10 bicyclists were counted riding in the same direction during the weekday PM peak hour. In general, bicycle conditions were observed to be operating acceptably, and no substantial safety or right-of-way issues were observed.

There are no on-street bicycle racks on the sidewalks adjacent to the project site on Post Street, Gough Street, or Geary Boulevard. One bicycle was locked to the parking sign on Gough Street. The existing 1333 Gough Street building does not provide bicycle parking; tenants bring their bicycles into their units.

LOADING CONDITIONS

There are no on-street commercial loading spaces adjacent to, or in the vicinity of, the project site on either Post or Gough streets, or on Geary Boulevard. At the existing 1333 Gough Street building, loading/unloading currently occurs as follows:

- For trash, recycling and compost pick-up, the trucks back up to the south garage gate and the driver opens the gate and pulls the bins to the truck. Currently, there are no compactors used at 1333 Gough Street. Trash and recycling are picked up Monday through Friday, and most pick-ups are conducted before 8:30 AM. Composting is picked up three days a week.
- All large deliveries and moves are scheduled through the Management Office to occur between 9 AM and 4:30 PM. The trucks back up to the south garage gate and bring items into the building through the garage.
- Smaller UPS/Federal Express type deliveries are brought to the door staff. The trucks generally park in the north guest parking area or on the street.

EMERGENCY VEHICLE ACCESS

The project site has frontages on three streets – Post Street, Gough Street, and Geary Boulevard. Emergency vehicle access to the project site is primarily from Geary Boulevard and Gough Street. The nearest fire station (Station 3) is at 1067 Post Street, located between Polk and Larkin streets.

PARKING CONDITIONS

The existing parking conditions were examined within a parking study area generally bounded by Bush Street, Webster Street, Geary Boulevard, Laguna Street, Ellis Street, and Van Ness Avenue

(see **Figure 4.C.1** on p. 4.C.3). Parking occupancy conditions were assessed for the weekday evening period (7 to 9 PM).

On-Street Parking Conditions

SFMTA manages and implements the Residential Permit Parking (RPP) program that was established in 1976 to preserve neighborhood living within a major urban center. The program's main goal is to provide more parking spaces for residents by discouraging long-term parking by people who do not live in the area. RPP zones limit parking to a restricted period, which varies by area but can range from a one to two-hour period, to a four-hour period, between 7 AM and 9 PM, unless a RPP permit is displayed, in which case there is no time limit enforced. Residences in RPP zones can purchase up to four permits annually per household from SFMTA.

The majority of the streets within the parking study area are within the "G" and "R" RPP areas, which restrict on-street parking Mondays through Friday, to a two-hour period between the hours of 8 AM and 6 PM. The "G" residential permit area is roughly bounded by Broadway to the north, Polk Street to the east, Post Street (the north curb) to the south, and Presidio Avenue to the west. The "R" residential permit area is roughly bounded by Geary Boulevard (the south curb) to the north, Franklin Street to the east, Grove Street to the south, and Webster Street to the west. The project site is not within either Residential Permit Parking area.

Streets outside of the residential permit parking areas have unrestricted parking, or are subject to short-term metered and unmetered parking regulations. Parking conditions adjacent to the project site are as follows:

- The project site frontage on Post Street is about 410 feet in length, and accommodates about 20 unrestricted parking spaces. To the west of the project site, parking between the hours of 7 AM and 6 PM is restricted to a one-hour period. On the north side of Post Street, on-street parking is subject to the "G" Residential Parking Permit restrictions.
- The project site frontage on Gough Street is about 196 feet in length, and accommodates four metered parking spaces with a one-hour restriction between 7 AM and 6 PM, and two driveways into the project site.
- The project site frontage on Geary Boulevard is about 410 feet in length and accommodates 15 unrestricted parking spaces, a bus stop about 85 feet in length, and a driveway into the project site. SFMTA has plans to convert the unrestricted parking spaces on Geary Boulevard to metered parking spaces in the near future, although timing of meter installation is not known.

Table 4.C.7: Existing On-Street Parking Supply and Occupancy - Weekday Evening (7 to 9 PM) presents a summary of the on-street parking supply within the parking study area, and the weekday evening occupancy conducted on September 27, 2012. There are about 1,250 on-street parking spaces within the study area. Overall, during the weekday evening period the on-street

**Table 4.C.7: Existing On-Street Parking Supply and Occupancy - Weekday Evening
(7 to 9 PM)**

Street	Supply	Weekday Evening	
		Occupied Spaces	Percent Occupancy
Bush Street – Webster Street to Van Ness Avenue	193	166	86%
Sutter Street – Webster Street to Van Ness Avenue	165	153	93%
Post Street – Webster Street to Van Ness Avenue	179	134	75%
Geary Boulevard – Webster Street to Van Ness Avenue	137	132	96%
O’Farrell Street – Franklin Street to Van Ness Avenue	24	21	88%
Ellis Street – Laguna Street to Van Ness Avenue	139	113	81%
Webster Street – Geary Boulevard to Bush Street	59	53	90%
Laguna Street – Ellis to Bush street	98	82	84%
Gough Street – Ellis to Bush streets	99	64	65%
Franklin Street – Ellis to Bush streets	99	47	47%
Van Ness Avenue– Ellis to Bush streets	58	52	90%
Total	1,250	1,017	81%

Source: LCW Consulting, 2014

parking spaces were about 81 percent occupied. It should be noted that most of the available parking spaces during the evening period were subject to the daytime one-hour and metered parking regulations, and are generally located on Geary Boulevard, Ellis Street, Laguna Street, Gough Street, and Van Ness Avenue. During weekday midday field surveys, on-street parking spaces were generally well utilized, however, on-street parking was readily available on streets adjacent to the project site.

Off-Street Parking Conditions

The Japan Center Garage, located 2½ blocks (about 1,200 feet) to the west, is the primary public parking garage serving the project vicinity. The garage contains 920 parking spaces, and has access driveways on Geary Boulevard and Post Street near Webster Street, and on Fillmore Street near Post Street. The garage is generally open between 6 AM and 2:30 AM on weekdays, and between 7 AM and 3 AM on weekends.¹³ The garage generally has capacity to accommodate additional vehicles – during the weekday midday, the parking occupancy is about 70 percent, however, on weekend days and evenings parking occupancies are greater although some parking spaces are typically available.

¹³ The Japan Center Garage is closed during the overnight hours, and vehicles left in the garage overnight can be retrieved after the garage opens in the morning (i.e., after 6 AM on weekdays, and after 7 AM on Saturdays and Sundays).

REGULATORY FRAMEWORK

TRANSIT FIRST POLICY

In 1998, the San Francisco voters amended the City Charter (Charter Article 8A, §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.

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 traffic signal timing 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 the next 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 *San Francisco Better Streets Plan (Better Streets Plan)* was adopted in 2010 and 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 this 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*. 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 design of sidewalks and crosswalks; however, in some cases, the *Better Streets Plan* includes guidelines for certain areas of the roadway, particularly at intersections. According to the street types defined in Chapter 4 of the *Better Streets Plan*, Post Street is a "Neighborhood Residential Street" and Geary Boulevard and Gough Street are "Residential Throughways." Neighborhood residential streets are quieter residential streets with relatively low traffic volumes and speeds while residential throughways have high levels of fast-moving traffic adjacent to residential land uses and can be unpleasant to walk or live along. Adjacent to the project site the existing 10-foot-wide sidewalk on Post Street meets the *Better Streets Plan* minimum sidewalk width for a Neighborhood Residential Street (minimum of 10 feet, and recommended width of 12 feet). The existing 10-foot-wide sidewalks on Gough Street and Geary Boulevard do not meet the *Better Streets Plan* minimum sidewalk width for a Residential Throughway (minimum of 12 feet, and recommended width of 15 feet).

IMPACTS AND MITIGATION MEASURES

SIGNIFICANCE THRESHOLDS

The significance criteria listed below are organized by mode to facilitate the transportation impact analysis; however, the transportation significance thresholds are essentially the same as the ones in the environmental checklist (Appendix G of the State *CEQA Guidelines*). 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:

- **Traffic** – In San Francisco, the threshold for a significant adverse impact on traffic has been established as deterioration in the LOS at a signalized intersection from LOS D or better to LOS E or LOS F, or from LOS E to LOS F. The operational impacts on unsignalized intersections are considered potentially significant if project-related traffic causes the level of service at the worst approach to deteriorate from LOS D or better to LOS E or F and Caltrans signal warrants would be met, or would cause Caltrans signal warrants to be met when the worst approach is already operating at LOS E or F. For an intersection that operates at LOS E or F under existing conditions, there may be a significant adverse impact depending upon the magnitude of the project's contribution to the worsening of the average delay per vehicle. In addition, the project would have a significant adverse impact if it would cause major traffic hazards or contribute considerably to cumulative traffic increases that would cause deterioration in LOS to unacceptable levels (i.e., LOS E or LOS F).

- **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.
- **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.
- **Construction** – A project’s construction-related impacts generally would not be considered significant due to their temporary and limited duration.

As described in **EIR Appendix A**, Initial Study, p. 65, 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 or its variants 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 in this EIR.

PROJECT FEATURES

Proposed Project

As discussed in **Chapter 2, Project Description**, p. 2.8, the proposed project would entail the demolition of the parking structure that surrounds the existing 1333 Gough Street building and construction of a new 262-unit residential building (the proposed 1481 Post Street building) west of 1333 Gough Street. The new building would include a 2,230-gsf café along Post Street at the northwest corner of the project site. Pedestrian access to the ground floor of the proposed 1481 Post Street building would be from Post Street along a pathway delineated with bollards. Along the west property line on the project site, a 10-foot-wide, publicly accessible walkway

would be developed to facilitate midblock pedestrian passage between Post Street and Geary Boulevard.

The proposed project would also include construction of a four-level, subsurface parking garage with 262 parking spaces plus 262 Class 1 bicycle parking spaces to serve the residents of the proposed 1481 Post Street building, and 176 parking spaces, including 4 carshare and 7 visitor parking spaces, to replace parking for the existing 1333 Gough Street residents. One Class 1 bicycle parking space and 18 Class 2 spaces would be provided along the Post Street frontage. The reconfigured ground floor of the 1333 Gough Street building would include a secure room along Gough Street for 30 Class 1 bicycle spaces.

The proposed project would change the entrance and orientation of the ground floor lobby of the 1333 Gough Street building. Pedestrian access to the reconfigured 1333 Gough Street lobby would be from Post Street along a pathway delineated with bollards. Pedestrian access for non-resident members of the reconfigured fitness center would be from Geary Boulevard.

Vehicular Access

Ingress to, and egress from, the 1481 Post Street portion of the garage would be from Post Street via a one-way, 20-foot-wide inbound driveway (on the northwestern portion of the project site) and a one-way, 24-foot-wide outbound driveway at the middle of the project site. The outbound Post Street driveway would also be used by exiting delivery and service trucks that would access the proposed service area/truck loading area from Geary Boulevard via a one-way, 32-foot-wide driveway. The 1481 Post Street garage entrance would have a gate operated by residents with keys. A second gate would admit 1481 Post Street residents to the four subsurface parking levels serving their building.

Ingress to, and egress from, the 1333 Gough Street portion of the garage would be from Post and Gough streets via two separate two-way, 24-foot-wide driveways at the northeast corner of the project site. There would be a separate gate, below the carshare and visitor parking spaces, to admit 1333 Gough Street residents to their portion of the subsurface parking (see **Figure 2.13** on p. 2.25).

Sidewalk Improvements

In order to conform to the requirements of the *Better Streets Plan* and requests made by the Planning Department's Urban Design Advisory Team, the proposed project includes a variety of sidewalk improvements. Subject to City review and approval, sidewalk bulbs on Post Street, Gough Street, and Geary Boulevard sidewalks fronting the project site would be constructed (see **Figure 2.3** on p. 2.10). Corner bulbs are proposed at the northeast corner of the project site (the southwest corner of the Post Street/Gough Street intersection) and at the southeast corner of the

project site (the northwest corner of the Gough Street/Geary Boulevard intersection.) Three midblock bulbs are proposed along Post Street (immediately west of the proposed two-way, 24-foot-wide driveway for 1333 Gough Street, immediately east of the proposed one-way, 24-foot-wide driveway for 1481 Post Street, and immediately west of the proposed one-way, 20-foot-wide driveway for 1481 Post Street). One midblock bulb is proposed along Gough Street (immediately south of the proposed two-way, 24-foot-wide driveway for 1333 Gough Street). One midblock bulb is proposed along Geary Boulevard (at the southwest corner of the project site). The bulbs would extend 7 feet into existing on-street parking spaces that front along the project site, permanently reducing the existing number of on street parking spaces. The sidewalks adjacent to the project site would also be widened as follows:

- On Post Street the sidewalk is proposed to be widened from 10 to 12 feet via a 2-foot-wide setback into the project site, and, where bulbs are proposed, the sidewalk is proposed to be widened from 10 to 19 feet via a 2-foot-wide setback into the project site and a 7-foot-wide extension into the adjacent parking lane.
- On Geary Boulevard the sidewalk is proposed to be widened from 10 to 12 feet via a 2-foot-wide setback into the project site, and, where the bulb is proposed, the sidewalk is proposed to be widened from 10 to 19 feet via a 2-foot-wide setback into the project site and a 7-foot-wide extension into the adjacent parking lane.
- On Gough Street the 10-foot-wide sidewalk adjacent to the existing 1333 Gough Street building would be maintained at its current width to minimize the loss of existing on-street parking spaces. At locations where bulbs are proposed, the sidewalk is proposed to be widened from 10 to 17 feet via a 7-foot-wide extension into the adjacent parking lane.

The proposed new driveways, the proposed elimination of existing driveways, the proposed sidewalk widening and bulbs, and the proposed on-street loading space along Post Street would call for reconfiguration of the on-street parking spaces fronting the project site. The 39 existing on-street parking spaces along Post Street, Gough Street, and Geary Boulevard fronting the project site would be permanently reduced by 21 spaces, to a total of 18, subject to City review and approval. Along Post Street, the 20 existing on-street parking spaces would be permanently reduced to four. Along Gough Street, the four existing metered on-street parking spaces would remain. Along Geary Boulevard, the 15 existing on-street parking spaces would be permanently reduced to 10.

Table 4.C.8: Comparison of *Better Streets Plan* Sidewalk Width Requirements to Existing, Proposed Project, and Project Variant Sidewalk Dimensions, presents a comparison of the existing sidewalk widths adjacent to the project site to the *Better Streets Plan* minimum and recommended requirements, and to the proposed sidewalk widths under the proposed project and Variants A, B, and C (see variant descriptions below). As shown in **Table 4.C.8**, implementation of sidewalk widening improvements under the proposed project would meet the minimum sidewalk width requirements required under the *Better Street Plan* for Post Street and Geary

Table 4.C.8: Comparison of *Better Streets Plan* Sidewalk Width Requirements – Existing, Proposed Project, and Variant Sidewalk Dimensions

Street	BSP (min.) ^a	BSP (rec.) ^a	Existing	Proposed Project	Parking Spaces Eliminated	Variants A, B and C	Parking Spaces Eliminated
Post Street	10'	12'	10'	12' plus three 7' bulbouts	16	19' 4"	20
Geary Boulevard	12'	15'	10'	12' plus one 7' bulbout	0	15'	4
Gough Street	12'	15'	10'	10' plus one 7' bulbout	5	18' 9"	15

Note:

^a *Better Streets Plan* minimum and recommended requirements for a Neighborhood Residential Street for Post Street, and for a Residential Thoroughway for Geary Boulevard and Gough Street.

Sources: *Better Streets Plan*; SLCE Architects; MWA Architects; LCW Consulting, 2014

Boulevard but not Gough Street, while under the project variants the sidewalk widening would meet the minimum sidewalk width requirements required under the *Better Street Plan* for each of the frontage streets.

Variants to the Proposed Project

The variants to the proposed project are illustrated in **Figure 2.16**, **Figure 2.17**, and **Figure 2.18** in **Chapter 2, Project Description** on pp. 2.31, 2.33, and 2.34. The construction of the corner bulbs described above for the proposed project would also be implemented under each of the variants. The sidewalk widening under the proposed project would be expanded upon as follows for each of the variants:

- The Post Street sidewalk would be widened from 12 feet to 19 feet, 4 inches;
- The Gough Street sidewalk would be widened from 10 feet to 18 feet, 9 inches; and
- The Geary Boulevard sidewalk would be widened from 12 feet to 15 feet.

The expansion of the sidewalk widening under each of the variants would preclude the need for midblock bulbs and the on-street commercial loading space along Post Street since the sidewalk expansion would include the adjacent parking lanes. The sidewalk expansion into the adjacent parking lanes would permanently eliminate all 39 existing parking spaces along Post Street, Gough Street, and Geary Boulevard adjacent to the project site.

Vehicular ingress and egress under variants would differ from that under the proposed project. Under Variant A, vehicles would enter the 1481 Post Street portion of the project site through a one-way, 12-foot-wide driveway along Post Street, as opposed to a one-way, 20-foot-wide driveway. Under Variant B, vehicles would enter and exit the 1481 Post Street portion of the

project site through a single, two-way, 30-foot-wide driveway along Post Street, instead of separate inbound and outbound driveways. Under Variant C, the proposed two-way, 24-foot-wide Post Street driveway at the northeast corner of the project site that would provide ingress to, and egress from, the 1333 Gough Street portion of the parking garage would not be constructed. Instead, vehicles would enter and exit via the existing, two-way, 27-foot-wide Gough Street driveway at the northeast corner of the project site. In all other respects, the variants to the proposed project would be the same as the proposed project.

APPROACH TO ANALYSIS

This section presents the methodology for analyzing transportation impacts and information considered in developing travel demand for the proposed project. The impacts of the proposed project on the surrounding roadways were analyzed using the *SF Guidelines 2002*, which provides direction for analyzing transportation conditions and in identifying the transportation impacts of a proposed project.

The analysis of the proposed project and its variants was conducted for existing and 2040 cumulative conditions. “Existing plus Project/Variant” conditions assess the near-term impacts of the proposed project or its variants, while “2040 Cumulative plus Project” conditions assess the long-term impacts of the proposed project or its variants in combination with other reasonably foreseeable development.

Senate Bill 743 and Public Resources Code §21099

As discussed in **Section 4.A, Introduction**, pp. 4.A.1-4.A.3, SB 743 amended CEQA by adding Public Resources Code §21099 regarding the analysis of parking impacts for certain urban infill projects in transit priority areas.¹⁴ Public Resources Code §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. However, the Planning Department acknowledges that parking conditions may be of interest to the public and the decision-makers. Therefore, this

¹⁴ 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 §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 online at <http://sfmea.sfplanning.org/Map%20of%20San%20Francisco%20Transit%20Priority%20Areas.pdf>.

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.

Furthermore, SB 743 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 within transit priority areas that promote a reduction in greenhouse gas emissions and do not use automobile delay (level of service) in determining significance (see p. 4.A.3). These provisions of SB 743 are not yet applicable to the proposed project, because new *CEQA Guidelines* will not be effective until sometime in 2015; therefore, this EIR analyzes the traffic-related impacts of the project as they pertain to LOS.

Impacts Analysis Methodology

Intersection Analysis

As with the existing conditions discussed on pp. 4.C.6-4.C.8 under “Environmental Setting”, the analysis of the effect of the proposed project or its variants on the ten study intersections used the 2000 *HCM* operations methodology. **Table 4.C.9: Signalized Intersection Level of Service Criteria** presents the relationship between LOS and delay for signalized intersections.

Table 4.C.9: Signalized Intersection Level of Service Criteria

Control/ LOS	Description of Operations	Average Delay (seconds per vehicle)
A	Insignificant Delays: No approach phase is fully used and no vehicle waits longer than one red indication.	≤ 10
B	Minimal Delays: An occasional approach phase is fully used. Drivers begin to feel restricted.	> 10.0 and ≤ 20.0
C	Acceptable Delays: Major approach phase may become fully used. Most drivers feel somewhat restricted.	> 20.0 and ≤ 35.0
D	Tolerable Delays: Drivers may wait through no more than one red indication. Queues may develop but dissipate rapidly without excessive delays.	> 35.0 and ≤ 55.0
E	Significant Delays: Volumes approaching capacity. Vehicles may wait through several signal cycles and long queues form upstream.	> 55 and ≤ 80
F	Excessive Delays: Represents conditions at capacity, with extremely long delays. Queues may block upstream intersections.	> 80.0

Note:

\leq means less than or equal to; $>$ means greater than.

Source: 2000 *HCM*, Transportation Research Board, 2000

Transit Analysis

The impact of additional weekday PM peak hour transit ridership generated by the proposed project or its variants on local and regional transit providers was assessed by comparing the projected ridership to the available transit capacity, using the corridor analysis used to describe existing conditions (see pp. 4.C.12-4.C.14 under “Environmental Setting”).

Pedestrian Analysis

As with the existing conditions discussed on pp. 4.C.14-4.C.18 under “Environmental Setting,” the effect of the proposed project or its variants on pedestrian safety/hazards issues (i.e., potential conflicts with traffic, transit, and bicyclists) was evaluated qualitatively while the effect of the proposed project or its variants on the pedestrian network (i.e., the adjacent intersections and crosswalks) was evaluated quantitatively using the *2000 HCM* methodology.

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 traffic.

Loading Analysis

Loading was analyzed by comparing the on-site loading spaces supplied by the proposed project or its variants to Planning Code requirements and projected loading demand.

Construction Analysis

The construction impact evaluation addresses the staging and duration of construction activity, estimated daily truck and worker volumes, and street lane and/or sidewalk closures.

Parking Analysis

The parking analysis 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 or its variants.

Proposed Project Travel Demand

Project travel demand refers to the new vehicle, transit, pedestrian, and bicycle traffic that would be generated by the proposed project. Travel demand associated with the existing uses at 1333 Gough Street is reflected in the existing conditions described above on pp. 4.C.6-4.C.20 under “Environmental Setting.” Parking and freight loading demand for the proposed project are

also analyzed. The travel demand, parking demand, and freight/service vehicle loading demand estimates were based on information contained in the *SF Guidelines 2002*.¹⁵

The travel demand reflects the new demand associated with the new residential (262 residential units) and café/restaurant uses (2,230 gsf) within the proposed 1481 Post Street building. For the 1333 Gough Street building, the travel demand analysis includes a net increase of 8,000 gsf to the existing fitness center use and the projected increase in gym membership from 200 to 400 members.

Trip Generation

The daily and PM peak hour person-trip generation for the proposed project includes 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), the café use, and the expanded fitness center use in the proposed project.¹⁶

Table 4.C.10: Number of Person-Trips Generated by Land Use presents the weekday daily, AM and PM peak hour person trips generated by the proposed uses. The proposed project would generate about 3,182 person-trips (inbound and outbound) on a weekday daily basis, 367 person-trips during the weekday AM peak hour, and 502 person-trips during the weekday PM peak hour. The project variants would generate the same number of person-trips as the proposed project.

Table 4.C.10: Number of Person-Trips Generated by Land Use

Land Use	Size	Person Trip Generation Rates	Person-Trips		
			Daily	AM Peak Hour	PM Peak Hour
Residential					
Studio/one bedroom	136 units	7.5 per unit	1,020	150	176
Two+ bedrooms	126 units	10.0 per unit	1,260	185	218
Fitness Center ^a	8,000 gsf	57 per 1,000 gsf	456	25	48
Café/Restaurant	2,230 gsf	200 per 1,000 gsf	446	7	60
Net-New Total			3,182	367	502

Note:

^a Trip generation for the fitness center is based on the net new square footage (8,000 net new gsf) that would be open to the public.

Sources: *SF Guidelines 2002*; LCW Consulting, 2014

Mode Split

Table 4.C.11: Net New Trip Generation by Mode - Weekday AM and PM Peak Hours presents the weekday AM and PM peak hour trip generation by mode for the proposed project. The project-generated person-trips were allocated among different travel modes in order to

¹⁵ TIS, pp. 55 - 62.

¹⁶ TIS, pp. 56-57.

Table 4.C.11: Net-New Trip Generation by Mode - Weekday AM and PM Peak Hours

Land Use	Person-Trips					Vehicle Trips
	Auto	Transit	Walk	Other ^a	Total	
Weekday AM Peak Hour						
Residential	111	137	57	30	335	102
Fitness Center	13	6	4	2	25	7
Café/Restaurant	4	2	1	0	7	2
Net-New Trips	128	145	62	32	367	111
Weekday PM Peak Hour						
Residential	130	162	67	35	394	121
Fitness Center	27	11	7	3	48	13
Café/Restaurant	33	14	9	4	60	16
Net-New Trips	190	187	83	42	502	150
Note:						
^a “Other” mode includes bicycles, motorcycles, and taxis.						

Note:

^a “Other” mode includes bicycles, motorcycles, and taxis.

Sources: SF Guidelines 2002; LCW Consulting, 2014

determine the number of auto, transit, and other trips going to and from the site.¹⁷ The “Other” category includes bicycle, motorcycle, taxi, and additional modes. During the weekday AM peak hour, the proposed project would generate about 111 vehicle trips, of which 30 vehicle trips would be inbound to the project site and 81 vehicle trips would be outbound from the project site. During the weekday PM peak hour, the proposed project would generate about 150 vehicle trips, of which 94 vehicle trips would be inbound to the project site, and 56 vehicle trips would be outbound from the project site. As shown in **Table 4.C.11**, the residential component of the proposed project would generate about 102 vehicle trips during the weekday AM peak hour and about 121 vehicle trips during the weekday PM peak hour.

The proposed project includes the elimination of the existing two-way, 20-foot-wide driveway on Geary Boulevard west of Gough Street and the introduction of a new two-way, 24-foot-wide driveway on Post Street west of Gough Street for the existing 1333 Gough Street building. Under the proposed project, vehicles using the existing Geary Boulevard driveway would instead use the new Post Street driveway. In order to account for this change, the number of vehicles at the driveways was determined from field surveys of the existing 1333 Gough Street building. Counts of the vehicle trips associated with the existing uses on the project site were conducted on October 2, 2012. Vehicles entering and exiting the three project driveways (two on Gough Street and one on Geary Boulevard) were counted during the two-hour weekday AM and PM peak periods. During an average weekday AM peak hour, the 169 residential units and fitness center generate about 26 vehicle trips (11 inbound and 15 outbound). During an average weekday PM peak hour, the 169 residential units and fitness center generate about 46 vehicle trips (22 inbound and 24 outbound). During both peak hours, the vehicle trips were generally equally split between the Gough Street and Geary Boulevard driveways. During the weekday AM and PM peak hours, 14 and 12 vehicle trips, respectively, were reassigned from the existing Geary Boulevard

¹⁷ TIS, pp. 57-58.

driveway to the proposed new Post Street driveway. The mode split for the project variants would be the same as that for the proposed project.

Trip Distribution/Assignment

The distribution of trips for the proposed land uses was obtained from census data for the residential land use and the *SF Guidelines 2002* for the café/restaurant and fitness center uses.¹⁸ Trip distribution is based on the origin/destination of the trips, and is separated into the four quadrants of San Francisco (Superdistricts 1 through 4), the East Bay, the North Bay, the South Bay, and Out of Region. As shown in **Table 4.C.12: Trip Distribution Patterns by Land Use**, the majority of the trips generated by the café/restaurant and fitness center uses would come to and from Superdistrict 2 where the project is located, while the majority of the project-generated residential trips would be to and from downtown and the rest of Superdistrict 1. These patterns were used as the basis for assigning project-generated vehicle trips to the local streets in the study area and transit trips to the north/south and east/west transit corridors.

Table 4.C.12: Trip Distribution Patterns by Land Use

Origin/ Destination	Fitness Center and Café/Restaurant		Residential
	Non-Work	Work	Non-Work/Work
San Francisco			
Superdistrict 1	13.0%	8.4%	60.8%
Superdistrict 2	27.0%	35.2%	8.7%
Superdistrict 3	14.0%	15.8%	8.7%
Superdistrict 4	9.0%	15.1%	8.7%
East Bay	11.0%	7.1%	4.4%
North Bay	4.0%	7.0%	4.4%
South Bay	8.0%	10.6%	4.3%
Out of Region	14.0%	0.8%	0.0%
Total	100%	100%	100%

Sources: *SF Guidelines 2002*; 1990 U.S. Census; LCW Consulting, 2014

The vehicle trip assignments for Variants A and B would be the same as for the proposed project. Variant C would not include the two-way, 24-foot-wide Post Street driveway into the 1333 Gough Street building, and instead vehicular access would only be via the Gough Street driveway. For Variant C, the 14 vehicle trips during the weekday AM peak hour and the 12 vehicle trips during the weekday PM peak hour were reassigned from the existing Geary Boulevard driveway to the existing driveway on Gough Street south of Post Street, which would not be modified under Variant C.¹⁹

¹⁸ TIS, pp. 61-62.

¹⁹ TIS Appendix D includes the intersection volumes associated with Existing plus Variant C conditions.

Loading Demand

As shown in **Table 4.C.13: Freight Delivery and Service Vehicle Demand by Land Use**, the proposed project would generate 22 delivery/service vehicle trips per day.²⁰ These daily truck trips correspond to a demand for 1.3 loading spaces during the peak hour of loading activities and one loading space during the average hour of loading activities. It is anticipated that most of the delivery/service vehicles that would be generated by the proposed project would consist of relatively small trucks with two axles (e.g., small courier trucks, mail trucks, and step vans which are typically less than 30 feet in length) and vans. In addition, the residential use would generate a demand for large moving trucks and small moving vans.

Table 4.C.13: Freight Delivery and Service Vehicle Demand by Land Use

Land Use	Daily Truck Trip Generation	Peak Hour Loading Spaces	Average Hour Loading Spaces
Residential ^a	13.1	0.8	0.6
Café/Restaurant ^b	8.0	0.5	0.4
Fitness Center ^c	0.7	0.0	0.0
Net-New Total	21.8	1.3	1.0

Notes:

^a Based on Residential rate of 0.03 truck trips per 1,000 square feet.

^b Estimated based on Hotel rate within Services category of land uses of 0.09 truck trips per 1,000 square feet. Note that truck trip generation based on net-new square footage of athletic club use.

^c Based on Restaurant/Bar rate of 3.60 truck trips per 1,000 square feet.

Sources: SF Guidelines 2002; LCW Consulting, 2014

Because the two off-street loading spaces within the proposed service area/truck loading area would also be used for deliveries to the existing 1333 Gough Street building, the loading demand was also calculated for the total residential square footage (431 units or 651,900 gsf), the new café/restaurant use (2,230 gsf), and the total fitness center use (12,700 gsf). Both buildings combined would generate about 29 delivery/service vehicle-trips to the project site per day. This corresponds to a demand for 1.6 loading spaces during the peak hour of loading activities, and 1.3 loading spaces during the average hour of loading activities. The project variants would generate the same loading demand as the proposed project.

Parking Demand

Parking demand consists of both long-term demand (typically residents and employees) and short-term demand (typically visitors).²¹ **Table 4.C.14: Weekday Midday and Evening Net-New Parking Demand by Land Use** presents the estimated net-new weekday midday and evening parking demand for the proposed project. Under the proposed project, the 262 residential units would generate a total weekday midday and evening parking demand for 274 and 339 long-

²⁰ TIS, p. 61.

²¹ See TIS pp. 61-62 for parking demand details.

Table 4.C.14: Weekday Midday and Evening Net-New Parking Demand by Land Use

Period/Land Use	Long-Term Parking Spaces	Short-Term Parking Spaces	Total
Midday			
Residential	271	0	271
Café/Restaurant	3	11	11
Fitness Center	0	10	13
Net-New Total	274	21	295
Overnight			
Residential	339	0	339

Sources: SF Guidelines 2002, LCW Consulting, 2014

term spaces, respectively. The café/restaurant and fitness center uses would generate a total weekday midday parking demand of 21 spaces. Overall, the proposed project would generate a new parking demand for 295 spaces during the weekday midday and for 339 spaces during the weekday evening. The project variants would generate the same parking demand as the proposed project.

PROJECT-LEVEL IMPACT EVALUATION

This section presents the assessment of traffic, transit, pedestrian, bicycle, loading, emergency vehicle access, and construction impacts generated by the proposed project or its variants. The 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 that affects the public right-of-way) as applicable.

The proposed project and its variants would include the same land uses on the project site and were evaluated together. The following scenarios have been assessed for transportation impacts:

- Existing plus Project/Variant, and
- Cumulative Year 2040.

As discussed above, the differences between the proposed project and its variants are limited to the pedestrian network improvements and slight variations to site access.

Traffic Impacts

Impact TR-1: The proposed project or its variants would not cause a substantial increase in traffic that would cause the level of service to decline from LOS D or better to LOS E or F, or from LOS E to F, at the ten study intersections in the project vicinity. (*Less than Significant*)

Intersection LOS Analysis

Proposed Project

The proposed project would generate 111 net-new vehicle trips (30 inbound and 81 outbound) during the weekday AM peak hour and 150 net-new vehicle trips (94 inbound and 56 outbound) during the weekday PM peak hour. Project-generated inbound and outbound vehicle trips were assigned to the local street network and the two new Post Street driveways associated with the 1481 Post Street building. Due to the elimination of the existing two-way, 27-foot-wide driveway on Gough Street north of Geary Boulevard and the existing two-way, 20-foot-wide driveway on Geary Boulevard west of Gough Street, the existing 14 weekday AM and 12 weekday PM peak hour vehicle trips that currently use those driveways were reassigned to the proposed two-way, 24-foot-wide Post Street driveway located approximately 40 feet west of Gough Street.

The project-related weekday AM and PM peak hour vehicle trips were added to existing traffic volumes to obtain Existing plus Project traffic volumes. **Table 4.C.15: Existing Plus Project Conditions and Existing Plus Variant Conditions – Weekday AM and PM Peak Hour Intersection LOS** presents the Existing plus Project intersection LOS for the weekday AM and

Table 4.C.15: Existing Plus Project and Existing Plus Variant Conditions – Weekday AM and PM Peak Hour Intersection LOS

Intersection	Existing		Existing plus Project, Variant A, Variant B		Existing plus Variant C	
	Delay ^a	LOS	Delay ^a	LOS	Delay ^a	LOS
Weekday AM Peak Hour						
1. Van Ness Avenue/Post Street	18.0	B	18.1	B	18.2	B
2. Van Ness Avenue/Geary Boulevard	20.3	C	20.7	C	20.6	C
3. Van Ness Avenue/O'Farrell Street	27.9	C	27.9	C	27.8	C
Weekday PM Peak Hour						
1. Van Ness Avenue/Post Street	14.0	B	14.1	B	13.9	B
2. Van Ness Avenue/Geary Boulevard	19.0	B	19.9	B	19.9	B
3. Van Ness Avenue/O'Farrell Street	20.5	C	20.6	C	21.0	C
4. Franklin Street/Post Street	11.0	B	11.4	B	11.2	B
5. Franklin Street/Geary Boulevard	36.0	D	38.0	D	37.0	D
6. Franklin Street/O'Farrell Street	39.2	D	40.4	D	40.4	D
7. Gough Street/Post Street	17.7	B	18.7	B	18.8	B
8. Gough Street/Geary Boulevard	39.8	D	41.6	D	42.3	D
9. Laguna Street/Post Street	13.7	B	14.0	B	14.0	B
10. Laguna Street/Geary Boulevard	22.9	C	23.0	C	23.0	C

Note:

^a Delay is presented in seconds per vehicle.

Source: LCW Consulting, 2014

PM peak hours. It also includes the intersection LOS for the project variants. In general, the addition of project-generated traffic would result in small increases in the average delay per vehicle at the ten study intersections. Under Existing plus Project conditions, during both the weekday AM and PM peak hours, all ten study intersections would continue to operate at acceptable levels of LOS D or better.

Variants

Traffic volumes under the variants would be the same as the proposed project because the proposed land uses would be the same. As indicated in **Table 4.C.15**, the average delay of vehicles and the intersection LOS at the ten study intersections under Variants A and B would be the same as those under the proposed project because site access would be virtually the same. Under Variant C access to 1333 Gough Street would be slightly different due to the elimination of the proposed Post Street driveway at the northeast corner of the project site (which provides access to the 1333 Gough Street parking). Under Variant C, existing vehicle trips that were reassigned to the new Post Street driveway under the proposed project (i.e., 14 vehicle trips during the weekday AM peak hour and 12 vehicle trips during the weekday PM peak hour) as a result of the elimination of the existing Geary Boulevard and Gough Street driveways at the southeast corner of the project site were reassigned to the retained driveway on Gough Street south of Post Street.²² As indicated in **Table 4.C.15**, the redistribution of the existing 1333 Gough Street vehicles to the retained Gough Street driveway south of Post Street would result in small changes in the average delay per vehicle at the ten study intersections. Compared to the proposed project and Variants A and B, delays at some intersections would be slightly higher, some would be slightly less, and some would be the same. Therefore, as with the proposed project, under Existing plus Project/Variant conditions during the weekday AM and PM peak hours, all ten study intersections would continue to operate at LOS D or better, and the impacts on intersection operating conditions would be less than significant.

Therefore, the proposed project or its variants would result in less-than-significant traffic impacts. No mitigation is necessary.

Driveway Operations

Proposed Project

Under the proposed project, three new driveways would be constructed on the south side of Post Street between Gough and Laguna streets, the existing Gough Street driveway south of Post Street would be reconfigured, and the Gough Street and Geary Boulevard driveways at the southeast corner of the project site would be eliminated. As a result, driveway operations (i.e.,

²² The traffic volumes for Existing plus Variant C are presented in Appendix D of the TIS.

the turn-in and turn-out movements) along Post and Gough streets for both the 1481 Post Street and 1333 Gough Street portions of the project site were assessed to determine if the proposed project would affect traffic flows along adjacent travel lanes.

Vehicular ingress to the 1481 Post Street portion of the parking garage would be via a one-way, 20-foot-wide driveway on Post Street (approximately 50 feet east of the midblock crosswalk at Laguna and Post streets) while egress would be via a one-way, 24-foot-wide driveway to Post Street at the midblock (approximately 60 feet east of the proposed one-way, 20-foot-wide Post Street driveway). Vehicular ingress to, and egress from, the 1333 Gough Street portion of the parking garage would be via two separate, two-way, 24-foot-wide driveways at Post and Gough streets.

1481 Post Street

Post Street has two eastbound travel lanes and one westbound travel lane between Gough and Laguna streets. East of Gough Street, Post Street is one-way eastbound with two mixed-flow travel lanes and a bus-only lane. Since two-way operations start west of Gough Street, existing weekday PM peak hour traffic volumes in the westbound direction between Gough and Laguna streets are low (i.e., about 80 vehicles during the weekday PM peak hour). During the weekday PM peak hour, eastbound traffic volumes are moderate (i.e., about 400 vehicles during the weekday PM peak hour). Drivers accessing the 1481 Post Street passenger loading/unloading area and the parking garage would use one of the two new Post Street driveways, which would be located about 60 feet apart. The proposed project would add about 94 inbound vehicle trips and 56 outbound vehicle trips during the weekday PM peak hour onto Post Street between Laguna and Gough streets, of which five vehicles would be turning left onto Post Street westbound. Vehicles exiting the project site would need to yield to eastbound and westbound traffic on Post Street. Intersection LOS analysis of the project driveways (i.e., as unsignalized intersections) indicates that delays associated with westbound traffic on Post Street and exiting project vehicles would be minimal – about 8.5 seconds of delay per vehicle and LOS A conditions for vehicles on westbound Post Street, and about 12.2 seconds of delay per vehicle and LOS B conditions at the proposed outbound driveway. In addition, any queues associated with entering and exiting vehicles would be accommodated on site because the access ramps into the garage would be about 65 feet from the north property line and public right-of-way (see **Figure 2.3** on p. 2.10). Therefore, due to the three travel lanes, traffic volumes, distance of project driveways from the intersections with Laguna Street and with Gough Street, and the residential nature of the proposed 1481 Post Street building, substantial conflicts with adjacent vehicular traffic would not be anticipated.

1333 Gough Street

The existing uses at 1333 Gough Street generate an average of 26 vehicle trips during the weekday AM peak hour and an average of 46 vehicle trips during the weekday PM peak hour. It is anticipated that a similar number of vehicles would use the new easternmost Post Street driveway located about 40 feet west of Gough Street and the reconfigured Gough Street driveway. During peak periods, eastbound vehicles on Post Street stopped at the red light at the approach to Gough Street may block the proposed driveway, requiring project-related vehicles approaching the driveway from eastbound Post Street to wait until eastbound traffic clears. It is not anticipated that there would be westbound left turns from Post Street westbound into this driveway. Instead, vehicles approaching the project site from southbound Gough Street are anticipated to continue past Post Street and use the reconfigured Gough Street driveway. Since Gough Street is one-way southbound (with three travel lanes), turns into the reconfigured Gough Street driveway would be right-turn-in and right-turn-out only, similar to existing conditions. In addition, any queues associated with entering and exiting vehicles would be accommodated on site because the access ramps into the garage would be about 65 feet from the north property line and public right-of-way and 35 feet from the east property line and public right-of-way (see **Figure 2.3** on p. 2.10). Therefore, due to the three travel lanes on Post Street and on Gough Street and the residential nature of the 1333 Gough Street building, substantial conflicts with adjacent vehicular traffic would not be anticipated.

Variants

The driveway operations for each of the variants and the effects on traffic conditions along adjacent roadways were also assessed, because there would be variations in site access. Under Variant A vehicular access to the 1481 Post Street and 1333 Gough Street portions of the project site would be the same as the proposed project; however, the one-way entry driveway into 1481 Post Street would be narrowed to 12 feet. Under Variant B vehicles would enter and exit the 1481 Post Street portion of the project site via a consolidated two-way, 30-foot-wide driveway along Post Street instead of two separate driveways. Vehicular access to the 1333 Gough Street portion of the project site would remain the same as the proposed project. Under Variant C vehicles would enter and exit the 1481 Post Street portion of the project site as under the proposed project; however, access to the 1333 Gough Street would be limited to the existing two-way, 27-foot-wide Gough Street driveway south of Post Street, which would not be modified, as opposed to a proposed two-way, 24-foot-wide driveway on Post Street west of Gough Street, which would not be constructed.

Traffic conditions along adjacent roadways associated with site access under Variant A would be the same as described above for the proposed project. Under Variant B the provision of one driveway for vehicular access to the 1481 Post Street building, rather than one inbound and one

outbound, would reduce the number of locations at which project-generated vehicles accessing the site would conflict with pedestrians and vehicles on Post Street; however, the number of vehicles entering and exiting the project site would remain unchanged from the proposed project. Under Variant C, the elimination of the proposed Post Street driveway would reduce the number of locations at which pedestrians on Post Street could potentially conflict with vehicles destined to and from the existing 1333 Gough Street building. Additionally, the elimination of on-street parking spaces on Post Street, Gough Street, and Geary Boulevard associated with the expansion of the sidewalk widening under each of the variants would reduce potential conflicts between vehicles traveling eastbound on Post Street, including Muni buses, and vehicles backing into parking spaces.

Therefore, as with the proposed project, substantial conflicts with adjacent vehicular traffic under the variants would not be anticipated due to the three travel lanes on Post Street (one westbound and two eastbound) and on Gough Street, the traffic volumes along these roadways, the distance of the Post Street driveways from the Laguna Street and Gough Street intersections, and the residential nature of the 1481 Post Street and 1333 Gough Street buildings.

Conclusion

Overall, under Existing plus Project/Variant conditions during both the weekday AM and PM peak hours, the ten study intersections would continue to operate at LOS D or better and project-generated vehicle trips would be distributed among a number of driveways and would not affect adjacent traffic flows. Therefore, the impacts of the proposed project or its variants on traffic operations would be less than significant. No mitigation is necessary.

While the traffic impacts of the proposed project or variants would be less than significant, **Improvement Measure I-TR-A: Monitoring and Abatement of Queues and Conflicts** and **Improvement Measure I-TR-B: Transportation Demand Management Plan**,²³ shown below, are identified in the TIS to further reduce and improve upon the proposed project's or variant's site access and queuing effects at the proposed access points from Post Street, Gough Street, and Geary Boulevard. The Planning Commission may consider adopting these improvement measures as conditions of project approval.

Improvement Measure I-TR-A: Monitoring and Abatement of Queues and Conflicts

As an improvement measure to reduce the potential for queuing of vehicles accessing the project site, it could be the responsibility of the project sponsor to ensure that recurring vehicle queues or vehicle conflicts (with left-turning vehicles including trucks on Post Street)

²³ Improvement measures are recommended further actions, agreed to by the project sponsor, identified to reduce or avoid impacts that are determined to be less than significant. Identification of improvement measures is not required under CEQA, but they are often presented in San Francisco environmental documents to inform decision-makers of additional actions that could improve the proposed project.

do not occur on Post Street, Gough Street, or Geary Boulevard adjacent to the site. A vehicle queue is defined as one or more vehicles (destined to the parking garage or loading facility) blocking any portion of the Post Street, Gough Street, or Geary Boulevard sidewalk or travel lanes on Post Street, Gough Street, or Geary Boulevard for a consecutive period of three minutes or longer on a daily and/or weekly basis. A vehicle conflict to monitor would be left-turning vehicles leaving the project site and blocking any portion of the Post Street or Gough Street sidewalks or travel lanes such that the flow of traffic, in particular transit, pedestrian, and bicycle traffic is interrupted.

If the Planning Director, or his or her designee, suspects that a recurring queue or conflicts is present, the Planning Department will notify the project sponsor in writing. Upon request, the owner/operator could hire a qualified transportation consultant to evaluate the conditions at the site for no less than seven days. The consultant could 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 could have 90 days from the date of the written determination to abate the recurring queue or conflict.

Improvement Measure I-TR-B: Transportation Demand Management Plan

As an improvement measure to reduce the unmet parking demand and encourage use of alternate modes, the project sponsor could develop and implement a Transportation Demand Management (“TDM”) Plan for each building that would be designed to reduce use of single-occupant vehicles and to increase the use of rideshare, transit, bicycle, and walk modes for trips to and from the proposed project. The TDM plan could include such measures as the following to reduce single occupancy vehicles and encourage alternate modes of travel:

- **TDM Coordinator:** The project sponsor should identify a TDM coordinator for the project site. The TDM Coordinator is responsible for the implementation and ongoing operation of all other TDM measures included in the proposed project. The TDM Coordinator could be a brokered service through an existing transportation management association (e.g., the Transportation Management Association of San Francisco, TMA SF), or the TDM Coordinator could be an existing staff member (e.g., property manager); the TDM Coordinator does not have to work full-time at the project site. However, the TDM Coordinator should be the single point of contact for all transportation-related questions from building occupants and City staff. The TDM Coordinator should provide TDM training to other building staff about the transportation amenities and options available at the project site and nearby.
- **Transportation and Trip Planning Information:**
 - *Move-in packet:* Provide a transportation insert for the move-in packet that includes information on transit service (local and regional, schedules and fares), information on where transit passes could be purchased, information on the 511 Regional Rideshare Program and nearby bike and car share programs, and information on where to find additional web-based alternative transportation materials (e.g., NextMuni phone app). This move-in packet should be continuously updated as local transportation options change, and the packet should be provided to each new building occupant. Provide Muni maps, San Francisco Bicycle and Pedestrian maps upon request.

- *New-hire packet:* Provide a transportation insert for the new-hire packet that includes information on transit service (local and regional, schedules and fares), information on where transit passes could be purchased, information on the 511 Regional Rideshare Program and nearby bike and car share programs, and information on where to find additional web-based alternative transportation materials (e.g., NextMuni phone app). This new hire packet should be continuously updated as local transportation options change, and the packet should be provided to each new building occupant. Provide Muni maps, San Francisco Bicycle and Pedestrian maps upon request.
- **Data Collection:**
 - *City Access.* As part of an ongoing effort to quantify the efficacy of TDM measures, City staff may need to access the project site (including the garage) to perform trip counts, and/or intercept surveys and/or other types of data collection. All on-site activities should be coordinated through the TDM Coordinator. Project sponsor assures future access to the site by City Staff. Providing access to existing developments for data collection purposes is also encouraged.
- **Bicycle Measures:**
 - *Parking:* Increase the number of on-site secured bicycle parking beyond *Planning Code* requirements and/or provide additional bicycle facilities in public right-of-way locations adjacent to or within a quarter mile of the project site (e.g., sidewalks, on-street parking spaces).
 - *Bay Area Bike Share:* Project sponsor should cooperate with the San Francisco Municipal Transportation Agency, San Francisco Department of Public Works, and/or Bay Area Bike Share (agencies) and allow installation of a bike share station in the public right-of-way along the project's frontage.

As part of **Improvement Measure I-TR-B**, the project sponsor would work with the Planning Department to determine a procedure for annual reporting of when and how measures within the TDM plan were implemented.

Implementation of **Improvement Measures I-TR-A and I-TR-B** would not result in any secondary transportation-related impacts.

Transit Impacts

Impact TR-2: The proposed project or its variants would not result in a substantial increase in transit demand that could not be accommodated by adjacent local and regional transit capacity, nor would it 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*)

Muni

The proposed project or its variants would generate 187 net-new transit trips (120 inbound and 67 outbound) during the weekday PM peak hour (see **Table 4.C.11** on p. 4.C.33). Transit riders associated with the proposed project or its variants would utilize the nearby Muni routes and would transfer to other Muni routes/lines or regional transit for trips to and from the project site. Based on the location of the project site and the anticipated origins and destinations of the proposed project's residents, employees and visitors, transit trips were assigned to Muni and the various regional transit operators (e.g., BART, AC Transit, Caltrain, SamTrans, and Golden Gate Transit). Based on the trip distribution patterns, it was estimated that of the 187 net-new transit trips during the weekday PM peak hour, 56 transit trips were assigned to the north/south corridor (the 47 Van Ness, 49 Van Ness-Mission, and the 22 Fillmore), and 121 transit trips were assigned to the east/west corridor (the 2 Clement, 3 Jackson, 38 Geary and 38L Geary Limited).

Table 4.C.16: Existing Plus Project Muni Capacity Utilization – Weekday PM Peak Hour presents the weekday PM peak hour ridership and capacity utilization for the north/south and east/west corridors for Existing plus Project/Variant conditions. The project variants would have the same weekday PM peak hour ridership and capacity utilization as the proposed project. With the addition of project-generated transit trips, the capacity utilization at the corridors would increase, but would remain at less than the 85 percent capacity utilization standard. Capacity

Table 4.C.16: Existing Plus Project/Variant Muni Capacity Utilization – Weekday PM Peak Hour

Corridor/Direction of Travel	Existing Capacity Utilization	Project Trips	Existing plus Project/Variant Capacity Utilization
North/South Corridor^a			
Northbound	61.2%	35	63.4%
Southbound	60.5%	21	61.8%
East/West Corridor^b			
Eastbound	50.0%	42	51.7%
Westbound	75.5%	79	78.9%

Notes:

^a The North/South corridor includes the 22 Fillmore, 47 Van Ness and the 49 Van Ness-Mission.

^b The East/West corridor includes the 2 Clement, the 3 Jackson, the 38 Geary, and the 38L Geary Limited.

Sources: San Francisco Planning Department; LCW Consulting, 2014

utilization on the 2 Clement and 38L Geary Limited is close to the 85 percent capacity utilization standard in the outbound direction (see **Table 4.C.3** on p. 4.C.13). The capacity utilization may increase with the addition of project-generated transit trips; however, because there would be capacity on other lines in this east-west corridor, and the overall corridor would operate at less than the 85 percent capacity utilization standard, project-generated transit trips would not result in a significant transit impact. Therefore, the impacts of the proposed project or its variants on local transit would be less than significant. No mitigation is necessary.

Regional Transit

Similar to Muni, the analysis of regional transit capacity utilization assesses the effect of project-generated transit trips on transit conditions in the outbound direction during the weekday PM peak hour. It was estimated that of the 187 net-new transit trips during the weekday PM peak hour, 26 would be to the East Bay (ten trips), North Bay (eight trips) and South Bay (eight trips). The majority of transit riders from the project site with an East Bay destination would be expected to use the 2 Clement and the 3 Jackson to reach the Montgomery Street BART station or the 38 Geary and 38L Geary Limited to reach the Powell Street BART station (alternatively these transit riders could walk to Van Ness Avenue and access the Civic Center BART station via the 47 Van Ness and 49 Van Ness-Mission). South Bay riders would be expected to walk to Van Ness Avenue to take the 47 Van Ness to the Caltrain station at Fourth and Townsend streets. The majority of North Bay riders would be expected to walk to Van Ness Avenue to utilize Golden Gate Transit. In general, the addition of project-related passengers would not have a substantial effect on the regional transit providers during the weekday PM peak hour because the capacity utilization standards for the regional transit providers would remain similar to that under existing conditions (see **Table 4.C.5** on p. 4.C.14). Therefore, the impacts of the proposed project or its variants on regional transit providers would be less than significant. No mitigation is necessary.

Project Driveway Impacts on Transit Operations

Proposed Project

As discussed above under **Impact TR-1**, the proposed project or its variants would increase the number of vehicles throughout the day on Post Street, which currently serves the eastbound 2 Clement and 3 Jackson. The proposed project or its variants would add about 94 inbound vehicle trips and 56 outbound vehicle trips during the weekday PM peak hour onto Post Street between Laguna and Gough streets, of which five vehicles would be turning left onto Post Street westbound and travelling across the midblock crosswalk at the northwest corner of the project site. Vehicles exiting the project site would need to yield to eastbound and westbound traffic on Post Street. Intersection analysis of the project driveways indicates that delays associated with westbound traffic on Post Street and exiting project vehicles would be minimal – about 8.5 seconds of delay per vehicle and LOS A conditions for vehicles on westbound Post Street, and about 12.2 seconds of delay per vehicle and LOS B conditions at the proposed outbound driveway. Vehicles turning to enter or exit the project site would not delay eastbound traffic flow (i.e., the 2 Clement and 3 Jackson bus routes). Because Post Street adjacent to the project site has two eastbound travel lanes that allow for buses and vehicles to bypass stopped vehicles (e.g., vehicles accessing a driveway), it is not anticipated that vehicles turning to enter or exit the project site would conflict with eastbound buses on Post Street.

The proposed changes along Geary Boulevard would reduce the level of conflict between transit and driveway operations there. In addition to eliminating the existing two-way, 20-foot-wide driveway on Geary Boulevard west of Gough Street, a new one-way, 32-foot-wide driveway into the proposed service area/truck loading area would be located about 100 feet west of the existing Muni bus stop. As discussed in more detail under **Impact TR-5**, the project sponsor has indicated that deliveries requiring use of the proposed service area/truck loading area would be scheduled with building management, with truck drivers required to call about five minutes prior to arrival to ensure that the gate at Geary Boulevard would be opened. In the event that the gate is not open when a truck arrives, it is not anticipated that the waiting truck would substantially affect traffic and transit operations on Geary Boulevard because there are four westbound travel lanes on Geary Boulevard adjacent to the project site, and vehicles and Muni buses within the travel lane closest to the curb would be able to change lanes to bypass a stopped truck. The additional time required to bypass a stopped vehicle at the driveway would not result in an increase in transit travel times so that additional transit vehicles would be required to maintain the existing headways between buses. Therefore, impacts on Muni service on Geary Boulevard related to loading operations would be less than significant.

Variants

The expansion of the sidewalk widening under each of the variants would eliminate all 39 on-street parking spaces on the adjacent roadways and reduce potential conflicts between Muni buses and vehicles backing into parking spaces. Although the number of vehicles entering and exiting the project site under each of the variants would remain unchanged from the proposed project, the provision of a single, two-way driveway to the 1481 Post Street building under Variant B instead of two separate one-way driveways, and the elimination of the proposed two-way Post Street driveway to the 1333 Gough Street building under Variant C, would reduce the number of locations at which Muni buses on Post Street could potentially conflict with project-generated vehicles entering or exiting the project site. Additionally, as with the proposed project, each of the variants would include the elimination of the existing Geary Boulevard driveway at the southeast corner of the project site and would add a new driveway off Geary Boulevard to provide access to the service area/truck loading area. Each of the variants would implement the loading protocol described above for the proposed project, and, loading operations under each of the variants, as with the proposed project, would have less-than-significant impacts on Muni service on Geary Boulevard. Therefore, the sidewalk widening under each of the variants and slight variations in vehicular access to the project site under Variants B and C would not result in conflicts or vehicle delays that would affect the operations of the adjacent and nearby Muni bus routes.

Conclusion

The project-generated transit trips would not substantially affect the capacity utilization of local and regional transit, and would not result in conflicts or vehicle delays due to project-generated vehicles that would affect the operations of the adjacent and nearby Muni bus routes. Therefore, the transit impacts of the proposed project or its variants would be less than significant. No mitigation is necessary. The proposed commercial space may be subject to the Transit Impact Development Fee (TIDF). The TIDF attempts to recover the cost of carrying additional riders generated by new development by obtaining fees on a square footage basis. TIDF funds may be used to increase transit service.

While the proposed project's or variant's impacts on transit either due to the increased demand on local and regional transit service or the potential conflicts and vehicle delays associated with local circulation and queuing would be less than significant, **Improvement Measure I-TR-G: Coordination of Move-In/Move-Out Activities and Large Deliveries** and **Improvement Measures I-TR-H: PM Peak Period Off-Street Loading Access Restrictions**, shown below under "Loading Impacts" on p. 4.C.58 and identified in the TIS to further reduce the proposed project's or variant's less-than-significant loading impacts, would also further reduce the proposed project's or variant's less-than-significant impacts on transit, specifically operations along Geary Boulevard where the 38 Geary and 38L Geary Limited bus routes operate. The Planning Commission may consider adopting this improvement measure as a condition of project approval.

Implementation of **Improvement Measures I-TR-G** and **I-TR-H** would not result in any secondary transportation-related impacts.

Pedestrian Impacts

Impact TR-3: The proposed project or its variants would not result in a substantial overcrowding on public sidewalks, nor create potentially hazardous conditions for pedestrians, or otherwise interfere with pedestrian accessibility on the site and adjoining areas. (*Less than Significant*)

The level of service analysis of the effects of project-generated pedestrian trips on sidewalks and crosswalks in the vicinity of the project site is followed by a qualitative discussion of the proposed changes to the immediate pedestrian network and vehicular access to the project site and their potential to generate hazardous pedestrian conditions or conflicts with traffic.

Crosswalk and Level of Service Analysis

Pedestrian trips generated by the proposed project or its variants would include walk trips to and from the proposed new land uses and to and from transit. The proposed new land uses would add

about 239 net-new pedestrian trips (145 trips destined to and from the transit routes and 94 walk/other trips) to the surrounding sidewalks and crosswalks during the weekday AM peak hour. During the weekday PM peak hour, about 312 net-new pedestrian trips (187 trips destined to and from the transit routes and 125 walk/other trips) would be added to the surrounding sidewalks and crosswalks (see **Table 4.C.11** on p. 4.C.33). During the weekday midday peak hour, the proposed project or its variants would generate fewer pedestrian trips than during the weekday AM or PM peak hours; however, as a conservative analysis, the same number of trips as generated during the weekday AM peak hour was used for the weekday midday peak hour analysis (i.e., 239 net-new pedestrian trips).²⁴ These pedestrian trips would be dispersed throughout the study area, depending upon the origin and destination of each trip.

The results of the pedestrian analysis for Existing plus Project/Variant conditions for the weekday AM, midday and PM peak hours are presented in **Table 4.C.17: Pedestrian Level of Service – Existing plus Project and Existing plus Variant Conditions for Weekday AM, Midday, and PM Peak Hours**. During the weekday AM, midday and PM peak hours, the addition of the new pedestrian trips on the surrounding Post Street, Gough Street, and Geary Boulevard sidewalks (including the proposed improvements described above) and the Gough Street/Geary Boulevard crosswalks could be accommodated and would not substantially affect the current pedestrian conditions. As pedestrian activity on the streets adjacent to the project site is generally low throughout the day (approximately 50 to 100 pedestrians per hour), pedestrian conditions under the proposed project or its variants would continue to remain acceptable (i.e., all sidewalk and crosswalk locations would operate at LOS A or LOS B conditions). Therefore, the proposed project or its variants would incrementally increase pedestrian volumes on Post Street, Gough Street, and Geary Boulevard but not to a level that would substantially affect pedestrian flows.

Pedestrian Safety/Hazards Issues

Pedestrian Access

Under the proposed project or its variants pedestrians would enter and exit the café/restaurant and residential lobby of the 1481 Post Street building from the Post Street sidewalk. Pedestrian access to the residential lobby, which would be set back about 47 feet from the north property line, would be via an on-site pedestrian pathway delineated with bollards to minimize on-site conflicts between pedestrians and vehicles. Pedestrians would enter and exit the reconfigured residential lobby of the 1333 Gough Street building, which would be set back approximately 65 feet from the north property line and about 35 feet from the east property line, from either the Post Street or Gough Street sidewalks. Pedestrian access to the renovated fitness center and swimming pool within the 1333 Gough Street building for non-resident members would be via a dedicated entrance from the Geary Boulevard sidewalk.

²⁴ TIS, p. 77.

Table 4.C.17: Pedestrian Level of Service – Existing plus Project and Existing plus Variant Conditions for Weekday AM, Midday, and PM Peak Hours

Analysis Locations	Existing		Existing plus Project		Existing plus Variant A, Variant B, and Variant C	
SIDEWALKS	MOE ^a (ped/min/ft)	LOS	MOE ^a (ped/min/ft)	LOS	MOE ^a (ped/min/ft)	LOS
Weekday AM Peak Hour						
Post Street	0.3	A	1.0	B	0.6	B
Geary Boulevard	0.6	B	0.6	B	0.4	A
Gough Street	0.5	A	0.9	B	0.6	B
Weekday Midday Peak Hour						
Post Street	0.5	A	1.2	B	0.7	B
Geary Boulevard	0.7	B	0.8	B	0.6	B
Gough Street	0.3	A	0.9	B	0.5	A
Weekday PM Peak Hour						
Post Street	0.5	A	1.4	B	0.8	B
Geary Boulevard	1.0	B	1.2	B	0.8	B
Gough Street	0.3	A	1.1	B	0.6	B
CROSSWALKS (Gough/Geary)	MOE ^a (sq ft/ped)	LOS	MOE ^a (sq ft/ped)	LOS	MOE ^a (sq ft/ped)	LOS
Weekday AM Peak Hour						
North	518	A	230	A	230	A
South	377	A	373	A	373	A
East	295	A	293	A	293	A
West	532	A	255	A	255	A
Weekday Midday Peak Hour						
North	176	A	103	A	103	A
South	234	A	234	A	234	A
East	269	A	269	A	269	A
West	418	A	205	A	205	A
Weekday PM Peak Hour						
North	289	A	162	A	162	A
South	449	A	449	A	449	A
East	228	A	228	A	228	A
West	311	A	155	A	155	A

Note:

^a MOE = Measure of Effectiveness. For sidewalks, MOE is measured in pedestrians per minute per foot (ped/min/ft), and for crosswalks MOE is measured in square feet per pedestrian (sq ft/ped).

Source: LCW Consulting, 2014

Vehicular Access

Vehicular ingress to the new 1481 Post Street building would be from the proposed one-way, 20-foot-wide driveway on Post Street. Vehicular egress would be from a proposed one-way, 24-foot-wide driveway about 60 feet east of the proposed inbound driveway. As indicated under **Impact TR-1**, above, the proposed project or its variants would add about 111 vehicle trips during the weekday AM peak hour and 150 vehicle trips during the weekday PM peak hour traveling to and from the 1481 Post Street driveways. Vehicular ingress and egress to the modified 1333 Gough Street building would be from the northeast corner of the project site via the proposed two-way, 24-foot-wide driveway on Post Street or the modified two-way, 24-foot-

wide Gough Street driveway immediately south of Post Street. As indicated under **Impact TR-1**, above, under the proposed project about 14 existing vehicle trips during the weekday AM peak hour and 12 vehicle trips during the weekday PM peak hour would be reassigned from the existing driveways on Gough Street and Geary Boulevard at the southeast corner of the project site to the new driveway on Post Street west of Gough Street. The introduction of three new driveways along the Post Street frontage and the potential for pedestrian-vehicle conflicts at these driveway locations would not substantially affect pedestrian flows, create potentially hazardous conditions for pedestrians or otherwise interfere with pedestrian accessibility to the site and adjoining areas. This is because Existing plus Project/Variant traffic volumes would remain low to moderate (i.e., about 85 vehicles in the westbound direction [one travel lane] and about 450 vehicles in the eastbound direction [two travel lanes] during the weekday PM peak hour, and lower during non-peak periods), and because the proposed driveways into the below-grade parking garages for the 1481 Post Street and 1333 Gough Street buildings would be set back from the north property line and the right-of-way by more than 45 feet, creating space for vehicles entering and exiting the project site to queue on site as opposed to in the public right-of-way.

As described above under **Impact TR-1**, vehicular access under Variant A would be the same as the proposed project while vehicular access under Variants B and C would be slightly different than that under the proposed project. Under Variants B and C there would be a reduction to the number of locations at which pedestrians on Post Street could potentially conflict with project-generated vehicles – from three driveways under the proposed project and Variant A to two driveways under Variants B and C. These changes to vehicular ingress and egress patterns would not alter the overall number of vehicles that would enter and exit the project site; and, when considered in combination with the sidewalk widening into the parking lanes of the adjacent roadways and the depth of the setback from the sidewalks to the parking garage entrances, conflicts with vehicles entering and exiting the project site would not be expected, and no significant hazards to pedestrians would result.

In addition, as a result of the new ingress and egress program for the proposed project or its variants, some of the new eastbound and westbound vehicles that would be added to Post Street would travel across the midblock crosswalk at the northwest corner of the project site. Under the proposed project a 67-foot-long by 7-foot-wide pedestrian bulb would be constructed between the edge of the proposed one-way, 20-foot-wide driveway and the midblock crosswalk to reduce the crossing distance from about 49 feet to 42 feet, and to provide for better visibility for motorists and pedestrians. The majority of vehicles that exit the project site from the one-way, 24-foot-wide outbound driveway located about 60 feet east of the proposed inbound driveway would travel eastbound on Post Street, and those that turn left and travel westbound would enter Post Street about 140 feet east of the midblock crosswalk, which would provide adequate distance for pedestrians to see an oncoming project-generated vehicle, and for drivers to observe

pedestrians in the crosswalk. Under each of the variants the expansion of the Post Street sidewalk into the 7-foot-wide parking lane would also reduce the crossing distance at this midblock crosswalk and increase the line of sight distance for both motorists and pedestrians. As discussed on p. 4.C.15, in late 2014 SFMTA will install pedestrian-activated flashing beacons at this midblock crosswalk. With the introduction of the new land uses on the project site and the re-orientation of the 1333 Gough Street building residential lobby (from Gough Street to Post Street) the proposed project or its variants would increase the number of pedestrians traveling on the Post Street sidewalks. Therefore, with this increase in the number of pedestrians on adjacent sidewalks and with consideration of the proposed pedestrian improvements, the proposed project or its variants would likely result in an increased awareness of pedestrians by drivers, which could enhance pedestrian safety.

Conclusion

Overall, while the addition of project-generated pedestrian trips would increase pedestrian volumes on Post Street, Gough Street, and on Geary Boulevard, the additional trips would not substantially affect pedestrian flows, create potentially hazardous conditions for pedestrians or otherwise interfere with pedestrian accessibility to the site and adjoining areas. Therefore, the impacts of the proposed project or its variants on pedestrian levels of service on adjacent sidewalks and crosswalks and on pedestrian safety would be less than significant. No mitigation is necessary.

While the impacts of the proposed project or its variants on pedestrian levels of service on adjacent sidewalks and crosswalks and pedestrian safety would be less than significant, **Improvement Measures I-TR-C, I-TR-D, and I-TR-E**, shown below, are identified in the TIS to further reduce the proposed project's less-than-significant impacts related to pedestrians. The Planning Commission may consider adopting these improvement measures as conditions of project approval.

Improvement Measure I-TR-C: Fund the Design and Implementation of Upgraded Crosswalks at Two Intersections in Project Vicinity

Crosswalks could be restriped to the Continental design at the intersections of Gough/Post streets and Laguna/Post streets, consistent with the *Better Streets Plan*. The project sponsor could contribute to the San Francisco Municipal Transportation Agency a fair share of the costs associated with the design and implementation of upgrading all crosswalks at the intersections of Gough/Post streets and Laguna/Post streets.

Improvement Measure I-TR-D: Fund the Design and Implementation of Pedestrian Countdown Signals at Two Intersections in Project Vicinity

Pedestrian countdown signals could be added to the traffic signals at the intersections of Gough/Post streets and Laguna/Post streets, consistent with the *Better Streets Plan*. The project sponsor could contribute to the San Francisco Municipal Transportation Agency a

fair share of the costs associated with the design and implementation of pedestrian signal heads in all directions at the intersections of Gough/Post streets and Laguna/Post streets.

Improvement Measure I-TR-E: Contribute to the Cost of Design and Implementation of Pedestrian-Actuated Flashing Beacons at the Existing Midblock Crosswalk on Post Street between Laguna and Gough Streets

The project sponsor could contribute to the San Francisco Municipal Transportation Agency a fair share of the cost of design and installation of pedestrian flashing beacons at the existing midblock crosswalk on Post Street between Laguna and Gough streets (at the western edge of the property at the former location of Octavia Street). The project sponsor contribution could be based on the number of project vehicle trips as a percentage of Existing plus Project traffic volumes at this location (i.e., 58 weekday PM peak hour project-generated vehicles over Existing plus Project traffic volumes [510 total vehicles] results in a project contribution of about 11 percent of the cost of design and installation of the flashing beacons).

Implementation of **Improvement Measures I-TR-C, I-TR-D, and I-TR-E** would not result in any secondary transportation-related impacts.

Bicycle Impacts

Impact TR-4: The proposed project or its variants 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*)

Proposed Project

The proposed project or its variants would add up to 262 residential units in the 1481 Post Street building. The Planning Code bicycle parking requirements for the 1481 Post Street building would be 141 Class 1 and 13 Class 2 spaces for the 262 units, and one Class 1 and three Class 2 spaces for the café/restaurant uses, for a total of 142 Class 1 and 16 Class 2 bicycle parking spaces. The proposed project would provide 262 Class 1 bicycle parking spaces²⁵ in a secure bicycle storage room at the first basement level within the 1481 Post Street building portion of the proposed parking garage. The Class 1 spaces would be accessible by a shuttle elevator from the lobby directly into the bicycle storage room. One Class 1 space would be provided at the north entrance of the midblock pedestrian walkway, 14 Class 2 bicycle parking spaces²⁶ would be provided in bicycle racks located on the Post Street sidewalk in front of the garden area, and four Class 2 spaces would be provided in bicycle racks on the Post Street sidewalk in front of the café/restaurant. In addition, the proposed project or its variants would add 30 Class 1 bicycle

²⁵ Class 1 Bicycle Parking Spaces are defined in Planning Code §155.1(a) as “Facilities which protect the entire bicycle, its components and accessories against theft and inclement weather, including wind-driven rain.” Examples include lockers or monitored parking.

²⁶ A Class 2 bicycle space is located in a publicly accessible, highly visible location intended for transient or short-term use by visitors, guests, and patrons to the building or use. (Planning Code §155.1(a))

parking spaces for residents of the existing 1333 Gough Street building in a secure ground floor room with access from Gough Street.

The project site is within convenient bicycling distance of office and retail buildings in the Civic Center and downtown San Francisco. Due to proximity, it is anticipated that a portion of the 32 weekday AM peak hour person trips and the 42 weekday PM peak hour person trips identified as “other” trips would be bicycle trips (see **Table 4.C.11** on p. 4.C.33).

There are three bicycle routes in the vicinity of the project site - Bicycle Route 16 on Post and Sutter streets, Bicycle Route 345 on Webster Street, and Bicycle Route 25 on Polk Street. The new project-generated bicycle trips would be added to these routes as well as to streets in the project vicinity that are not designated bicycle routes. The proposed project or its variants would include three new driveways on Post Street, which is part of eastbound Bicycle Route 16 (as a Class III signed facility). Post Street has two eastbound travel lanes and relatively low traffic volumes adjacent to the project site (about 40 westbound and 400 eastbound vehicles during the weekday PM peak hour). Due to the predominantly residential nature of the proposed project or its variants (i.e., with lower trip generation than non-residential uses), it is not anticipated that the vehicle trips generated by the new uses would substantially affect bicycle travel along Post Street. Although the proposed project or its variants would result in an increase in the number of vehicles and bicyclists on roadways in the vicinity of the project site, this increase would not be substantial enough to affect bicycle travel in the area. As with the proposed project, each of the variants would result in an increase in the number of vehicles and bicyclists on roadways with and without bicycle routes in the vicinity of the project site, but this increase and the potential for bicycle-vehicle conflicts would not be substantial enough to affect bicycle travel in the area. Furthermore, the elimination of all 20 on-street parking spaces on Post Street (four more than under the proposed project) that would result with implementation of the sidewalk widening under each of the variants would reduce potential conflicts between bicyclists traveling eastbound on Post Street and vehicles backing into parking spaces. Therefore, impacts of the proposed project or its variants on bicyclists traveling to and from the project site as well as those traveling on the immediate roadway network would be less than significant. No mitigation is necessary.

While the impacts of the proposed project or its variants on bicyclists would be less than significant, **Improvement Measure I-TR-F**, shown below, is identified in the TIS to encourage bicycle use to and from the project site, which includes the existing 1333 Gough Street building. The Planning Commission may consider adopting this improvement measure as a condition of project approval.

Improvement Measure I-TR-F: Additional Bicycle Parking for the 1333 Gough Street Building

Although not required under the Planning Code for the existing 1333 Gough Street building, the project sponsor could consider increasing the amount of Class 1 and/or Class 2 bicycle parking spaces available for use by the existing 1333 Gough Street residents and visitors.

Implementation of **Improvement Measure I-TR-F** would not result in any secondary transportation-related impacts.

Loading Impacts

Impact TR-5: The loading demand for the proposed project or its variants would be accommodated within the proposed on-site loading facilities, and would not create potentially hazardous conditions or significant delays for traffic, transit, bicyclists or pedestrians. (*Less than Significant*)

Loading Supply and Demand

San Francisco Planning Code §152 provides requirements for off-street loading spaces within an RM-4 zoning district. For the residential uses, the proposed project or its variants would be required to provide two on-site loading spaces. No loading spaces would be required for the café/restaurant use because it would have less than 10,000 gsf of space. The proposed project or its variants would provide a service area/truck loading area between the proposed 1481 Post Street building and the proposed 1333 Gough Street swimming pool addition, with access from Geary Boulevard (see **Figure 2.3** on p. 2.10).²⁷ The proposed service area/truck loading area would have two on-site loading spaces that would meet Planning Code §152 requirements and the minimum dimensions for loading spaces required by Planning Code §154(b).

The proposed service area/truck loading area would accommodate two trucks loading simultaneously and would serve both the existing 1333 Gough Street building and the proposed 1481 Post Street building. As discussed above under “Approach to Analysis” on p. 4.C.35, the new uses associated with the proposed project or its variants (including the 8,000-gsf fitness center addition) would generate about 22 delivery/service vehicle-trips per day to the project site. However, because the proposed off-street loading spaces would also be used for deliveries to the existing 1333 Gough Street building, the loading demand was calculated for the total existing and proposed uses on the project site. The combined loading demand for both buildings and the fitness center would generate about 29 delivery/service vehicle-trips per day to the project site, which corresponds to a demand for 1.6 loading spaces during the peak hour of loading activities

²⁷ The existing 1333 Gough Street building does not have a dedicated on-site loading area; deliveries and move-in and move-out activities occur from the existing on-site at-grade parking area fronting Geary Boulevard.

and 1.4 loading spaces during the average hour of loading activities. Thus, the combined peak loading demand would be accommodated within the two on-site loading spaces.

The project sponsor would request that the curb parking lane on Post Street between the proposed inbound and outbound driveways that would serve the 1481 Post Street building (approximately 60 feet) be designated as a commercial loading zone (i.e., yellow zone). The proposed commercial loading zone would need to be approved at a public hearing by the SFMTA Board of Directors. It is anticipated that this commercial loading zone would serve the 1481 Post Street building and be used for small trucks and service delivery vehicles such as UPS and Federal Express. Small trucks and service delivery vehicles would access the 1333 Gough Street building via the new Post Street driveway or the existing Gough Street driveway at the northeast corner of the project site, and stop at the northeast corner of the driveway.²⁸

Unlike the proposed project, under each of the variants the proposed on-street commercial loading zone on Post Street would not be requested from SFMTA due to the sidewalk widening into the curbside parking lane. Under Variants A and C, small trucks and service delivery vehicles destined to the 1481 Post Street building (such as UPS and Federal Express deliveries) would access the project site via the westernmost one-way driveway and stop on the north side of the on-site driveway. The on-site driveway would be able to accommodate a small truck or service delivery vehicle while allowing for vehicles to access the passenger pick-up and drop-off area and parking garage. Under Variant B, small trucks and service delivery vehicles would enter and exit the 1481 Post Street portion of the project site through a single two-way, 30-foot-wide driveway on Post Street (instead of separate inbound and outbound driveways in the proposed project). Small trucks and service delivery vehicles destined to the 1481 Post Street building would stop adjacent to the on-site pedestrian walkway near the 1481 Post Street lobby entrance. The on-site driveway would have adequate space for small trucks to turn around on site and exit the driveway. Residents entering or exiting the garage after a small truck initiates turnaround maneuvers would need to yield to the truck. As with the proposed project, under each of the variants small truck and service delivery vehicles would be accommodated on the northeast portion of the project site; however, under Variant C the proposed two-way, 24-foot-wide driveway on Post Street for the existing 1333 Gough Street building would not be provided; therefore, all vehicles, including small trucks and service delivery vehicles, would access the 1333 Gough Street building via the existing two-way, 27-foot-wide Gough Street driveway.

Residential Move-In and Move-Out Activities

Residential move-in and move-out activities are anticipated to occur primarily from the proposed service area/truck loading area with goods carted to the residential units via the service corridors

²⁸ Currently small delivery trucks park in the existing north guest parking area or on-street, and packages are brought to the door staff.

and elevators. In the event that a very large moving truck (e.g., a 53-foot long tractor trailer long distance moving van) cannot be accommodated within the proposed service area/truck loading area, on-street curb parking on Geary Boulevard or Post Street could be reserved through SFMTA. Under each of the variants, reservation of space in the adjacent on-street parking lanes for large moving trucks could not be accommodated because of the sidewalk widening into the adjacent parking lanes. Under each of the variants, loading activities requiring the use of a large moving truck would have to be planned for times when space within the proposed service area/truck loading area would be available.

Trash, Recycling and Compost Pick-Up

Trash, recycling and compost for the proposed 1481 Post Street building and the existing 1333 Gough Street building would be stored on-site within the proposed service area/truck loading area. There would be separate compactors in the service area for trash and recycling for each building. A trash, recycling, and compost area would be provided for each building, and would be connected to internal service areas by corridors. It is anticipated that trash and recycling would be picked up once a week for the 1333 Gough Street building, and twice a week for the 1481 Post Street building. Compost is anticipated to be picked up approximately every other day, and composting for both buildings would be picked up at the same time. The same protocol would be in place for under each of the variants.

Loading Access and Circulation

Delivery and service vehicles would enter the proposed service area/truck loading area from a proposed one-way, 32-foot-wide driveway from Geary Boulevard and exit to Post Street via a one-way, 24-foot-wide driveway by proceeding through the service area/truck loading area on a 19-foot-wide interior driveway. The one-way, 32-foot-wide driveway from Geary Boulevard would accommodate single-unit trucks up to 30 feet in length and semi-trailer trucks up to 50 feet in length. Trucks up to 50 feet in length would turn into the driveway from the right-most travel lane adjacent to the curb parking lane allowing for a turning radius of 42 feet. Trucks longer than 50 feet may need to encroach into the second westbound travel lane to complete the turn. Since Geary Boulevard currently contains four travel lanes, it is not anticipated that the occasional need for trucks longer than 50 feet to make a wider turn would substantially affect Geary Boulevard operations.²⁹ The driveway widths on Geary Boulevard and Post Street would accommodate the truck turning movements without encroaching on the sidewalk.

The project sponsor has indicated that deliveries requiring use of the proposed service area/truck loading area would be scheduled with building management to ensure that they do not conflict

²⁹ TIS Appendix B includes truck turning templates for turns from Geary Boulevard into the loading driveway, within the loading area, and out onto Post Street.

with trash, recycling and compost pick-up. Truck drivers would be required to call about five minutes prior to arriving at the service area, and the gate at Geary Boulevard would be opened by staff from the building to which the delivery is being made. This delivery protocol would ensure that trucks accessing the proposed service area/truck loading area do not stop within the adjacent travel lane while waiting for clearance to proceed into the service area. In the event that the gate is not open when a truck arrives, it is not anticipated that the waiting truck would substantially affect traffic and transit operations on Geary Boulevard because there are four westbound travel lanes on Geary Boulevard adjacent to the project site, and vehicles and Muni buses within the travel lane closest to the curb would be able to change lanes to bypass a stopped truck. The driveway into the project site on Geary Boulevard would be located about 100 feet west of the Muni bus stop, which would provide adequate distance for a bus to change lanes.

For the loading operations of the proposed project or its variants to have a significant impact on transit routes that operate on Geary Boulevard the loading operations would have to result in an increase in transit travel times so that additional transit vehicles would be required to maintain the existing headways between buses. Although not anticipated to occur, this would be the case if the travel time increases to the 38 Geary or 38L Geary Limited attributable to the proposed project or its variants would be greater than half of the existing route headway, or the added travel time would require the provision of one or more additional transit vehicles in order to maintain scheduled service. For the 38 Geary and 38L Geary Limited travel time increase of four minutes and of about three minutes, respectively, would be required for the proposed project or its variants to result in a significant impact. Due to the uncongested conditions on westbound Geary Boulevard between Gough and Laguna streets, it is unlikely that buses would experience an increase in overall travel times of three to four minutes if a truck were stopped at the driveway awaiting access into the service area. Therefore, the proposed project's or variant's loading-related impacts on Muni buses on Geary Boulevard would be less than significant.

Passenger Loading and Unloading

Passenger loading and unloading activities would occur on site in front of the lobby to the 1481 Post Street building (set back approximately 47 feet from the north property line) and in front of the reconfigured lobby for the 1333 Gough Street building (set back approximately 65 feet from the north property line and approximately 35 feet from the east property line). Access to the passenger pick-up and drop-off areas would be from Post Street via a proposed one-way, 20-foot-wide driveway (the westernmost driveway) and a two-way, 24-foot-wide driveway (the easternmost driveway). In both cases, there would be sufficient roadway width on the project site to allow for vehicles destined to the parking garage ramps to bypass a vehicle stopped at these passenger pick-up and drop-off areas. The passenger loading and unloading activities at 1481 Post Street for each of the variants would be the same as the proposed project even though Variant B has slightly different vehicular access (a single two-way driveway instead of two

separate inbound and outbound driveways.) The passenger loading and unloading activities at 1333 Gough Street for each of the variants would be the same as the proposed project even though Variant C has slightly different vehicular access (one two-way driveway instead two).

Conclusion

Since the proposed project or its variants would accommodate the freight delivery and service vehicle loading demand within the proposed on-site loading spaces, and would not create potentially hazardous conditions or significant delays for traffic, transit, bicyclists or pedestrians, the proposed project or its variants would have less-than-significant impacts on loading. No mitigation is necessary.

While the loading impacts of the proposed project or its variants would be less than significant, **Improvement Measure I-TR-A: Monitoring and Abatement of Queues and Conflicts** shown under **Impact TR-1** on pp. 4.C.41-4.C.42, and **Improvement Measures I-TR-G: Coordination of Move-In/Move-Out Activities**, and **I-TR-H: PM Peak Period Off-Street Loading Access Restrictions**, presented below, are identified in the TIS to further reduce the proposed project's or variant's less-than-significant impacts related to loading. The Planning Commission may consider adopting these improvement measures as conditions of project approval.

Improvement Measure I-TR-G: Coordination of Move-In/Move-Out Activities and Large Deliveries

As an improvement measure to reduce the potential for conflicts between large delivery vehicles and Muni bus operations on Post Street and Geary Boulevard, residential move-in and move-out activities and large deliveries could be scheduled and coordinated through building management. Building management could ensure that the gate on Geary Boulevard into the service area is opened by staff from the building prior to delivery trucks utilizing the service area arriving at the project site.

Improvement Measure I-TR-H: PM Peak Period Off-Street Loading Access Restrictions

Delivery trucks could be restricted from accessing the off-street loading facility via Geary Boulevard during the 4 to 7 PM peak period on weekdays. Trucks could be permitted to depart the off-street loading facility via Post Street at any time.

Implementation of **Improvement Measures I-TR-G** and **I-TR-H** would not result in any secondary transportation-related impacts.

Emergency Vehicle Access Impacts

Impact TR-6: The proposed project or its variants would not result in significant impacts on emergency vehicle access. (*Less than Significant*)

Implementation of the proposed project or its variants, including associated sidewalk widening and other pedestrian improvements, would not result in any changes to adjacent travel lanes. Emergency vehicle access to the project site would remain unchanged from existing conditions; thus emergency service providers would continue to be able to pull up to the project site from Post Street, Gough Street, and Geary Boulevard. Therefore, the proposed project or its variants would not limit emergency vehicle access to the project site and nearby vicinity and emergency vehicle access impacts would be less than significant.

Construction Impacts

**Impact TR-7: The proposed project or its variants would not result in construction-related transportation impacts because of their temporary and limited duration.
(Less than Significant)**

Proposed Project

The construction impact assessment is based on currently available information from the project sponsor, and professional knowledge of typical construction practices citywide. Prior to construction, as part of the construction application phase, the project sponsor and construction contractor(s) would be required to meet with DPW 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 meet 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.³⁰ Prior to construction, the project contractor would coordinate with Muni's Street Operations and Special Events Office to coordinate construction activities and reduce any impacts to transit operations on Post Street or Geary Boulevard. 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.

It is anticipated that construction of the proposed project or its variants would take approximately 27 months. There would be six primary construction phases, which would partially overlap:

- Demolition – two months
- Excavation and shoring – two and a half months
- Foundation and below-grade construction – four and a half months
- Base building construction – 11 months
- Exterior finishing – four months

³⁰ The SFMTA Blue Book, 8th Edition, January 2013. Available online at <http://www.sfmta.com/services/streets-sidewalks/construction-regulations>. Accessed March 20, 2014.

- Interior finishing – 12.5 months

Construction-related activities would typically occur Monday through Friday, between 7 AM and 4 PM. Construction is not anticipated to occur on Saturdays, Sundays or major legal holidays, but may occur on an as-needed basis. The hours of construction would be stipulated by the Department of Building Inspection. The contractor would need to comply with the San Francisco Noise Ordinance and the Blue Book, including requirements to avoid peak hour construction activities on adjacent streets.³¹

Based on information obtained from the project sponsor, construction staging would occur on-site, and not within the adjacent parking lane on Post Street or Geary Boulevard. The sidewalks on Post Street and Geary Boulevard adjacent to the project site may need to be closed for a portion of the construction period (e.g., during the excavation and foundation stages and when sidewalks would be widened), and pedestrian traffic would need to be shifted to a protected pedestrian walkway within the parking lane. It is not anticipated that any travel lane closures would be required under the proposed project; however, with the sidewalk widening into the parking lane under each of the variants, temporary travel lane closures would generally be required, depending on the construction activity. Post Street, Gough Street, and Geary Boulevard all have multiple travel lanes adjacent to the project site, and the temporary travel lane closures under each of the variants would reduce the roadway capacity and would require all vehicles to use the remaining lane on Post Street and remaining lanes on Gough Street and Geary Boulevard. Temporary lane closures would result in additional vehicle delay, and some drivers might shift to other, potentially less convenient, routes to access their destination. In addition the expansion of the sidewalk widening along Geary Boulevard under each of the variants would require temporary relocation of the existing bus stop on Geary Boulevard west of Gough Street, and the relocation would need to be reviewed and approved by SFMTA. Any temporary sidewalk or traffic lane closures would be coordinated with the City in order to minimize the impacts on traffic and transit. In general, traffic lane and sidewalk closures are subject to review and approval by the Department of Public Works (DPW) and the SFMTA Transportation Advisory Staff Committee (TASC).

Support poles for Muni's overhead wires are located adjacent to the project site on Post Street; however, no wires are attached via eyebolts to the existing 1333 Gough Street building. During the construction period the pole supporting the overhead wire system on Post Street would need to be maintained, and this effort would be coordinated with Muni's Overhead Lines Department.

During the construction period, there would be a flow of construction-related trucks into and out of the site. As shown on **Table 4.C.18: Summary of Construction Phases and Duration, and**

³¹ The San Francisco Noise Ordinance permits construction activities seven days a week, between 7 AM and 8 PM.

Daily Construction Trucks and Workers by Phase, there would be an average of between 15 and 90 construction trucks traveling to and from the site on a daily basis (i.e., an average of 30 to 180 daily truck trips). 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 affect both traffic and Muni operations. It is anticipated that a majority of the construction-related truck traffic would use Post Street and Geary Boulevard to access Franklin and Gough streets and Van Ness Avenue to connect with U.S. 101 for South Bay and East Bay destinations.

As shown on **Table 4.C.18**, there would be an average of between 25 and 125 construction workers per day at the project site. The trip distribution and mode split of construction workers are not known. However, 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 or its variants and would be temporary in nature. Construction workers who drive to the site would cause a temporary increase in parking demand. The time-limited and residential parking restrictions in the vicinity of the project site limit legal all-day parking by construction personnel; however, there are unrestricted on-street parking spaces on both Post Street and Geary Boulevard immediately adjacent to the project site. Construction workers would either park in nearby parking facilities, such as the Japan Center Garage which currently has availability during the day, or on site once the garage element of the proposed project or its variants is completed. As a result, the proposed project or its variants would not substantially affect area wide parking conditions during the 27-month construction period.

Table 4.C.18: Daily Construction Trucks and Workers by Phase

Phase	Duration (months)	Number of Daily Construction Trucks		Number of Daily Construction Workers	
		Peak	Average	Peak	Average
Demolition	1.75	20	15	35	25
Excavation and Shoring	2.5	110	90	125	110
Foundation & Below Grade Construction	4.5	80	50	100	75
Base Building	11	90	60	150	125
Exterior Finishing	4	25	20	35	25
Interior Finishing	12.5	35	25	75	50

Source: Webcor Builders, January 2013

It is anticipated that construction activity of the proposed project or its variants may overlap with the construction activity of other reasonably foreseeable projects in the vicinity, notably the California Pacific Medical Center's (CPMC) Cathedral Hill medical campus (currently under construction) on the block bounded by Post Street, Geary Street, Van Ness Avenue and Franklin Street, and the proposed Van Ness Avenue and Geary Bus Rapid Transit (BRT) projects. The construction activities associated with these nearby projects would affect access, traffic

operations and pedestrian movements and are discussed below under the “Cumulative Impacts Evaluation” subsection on pp. 4.C.68-4.C.80. It is anticipated that the construction manager for each project would be required to work with the various departments of the City to develop a detailed and coordinated plan that would address construction vehicle routing, traffic control and pedestrian movement adjacent to the construction area for the duration of the overlap in construction activity.

Temporary Parking for 1333 Gough Street

Residents of 1333 Gough Street are currently served by parking spaces located along the Geary Boulevard and Post Street ground floor levels and in a below-grade area on the site of the proposed 1481 Post Street building immediately to the west. The area along the western side of 1333 Gough Street would be excavated to construct the 1481 Post Street improvements. During construction of the proposed 1481 Post Street building, the current self-parking areas along the ground floor levels of Post Street and Geary Boulevard would be modified and reused to handle the majority of the temporary parking for the residents.

First, the existing concrete decking immediately above the parking areas on both the Geary Boulevard and Post Street sides would be demolished. Then, the modified parking areas would be equipped with temporary double stacker units that would be located along both sides of these parking areas up to the westernmost line of the existing 1333 Gough Street building and the start of the construction zone. One stacker unit would provide parking for two automobiles (or more if multi-level stackers are used). These areas would handle approximately 68 vehicular stacker units, for a total of 136 spaces. In addition, there would be 10 visitor spaces that would be shared with the parking operator for use as temporary spaces while cars are being moved from stacker locations. All of the temporary parking would be attendant parking, with vehicles delivered to residents at the main entrance.

At the conclusion of the construction of the 1481 Post Street building and issuance of a temporary certificate of occupancy for the garage (approximately 13 to 15 months into the construction schedule), the stacker units would be removed and the self-parking spaces would be moved to temporary spaces within the new four-level self-park garage beneath the 1481 Post Street building, which would have access from Post Street (location of access to garage would be determined based on construction staging and construction truck access requirements, and may vary depending on construction phase). The area on the south and north sides of the 1333 Gough Street building would then be excavated to provide for the permanent two-level self-park garage facility that would accommodate 1333 Gough Street parking demand. Alternatively, multi-level stackers could be used, and the south and north sides of 1333 Gough Street could be excavated sequentially.

Conclusion

Overall, because construction activities would be temporary and limited in duration and are required to be conducted in accordance with City requirements, the construction-related transportation impacts of the proposed project or its variants would be less than significant.

While the construction-related transportation impacts of the proposed project or its variants would be less than significant, **Improvement Measure I-TR-I: Construction Measures**, shown below, is identified in the TIS to further reduce the less-than-significant impacts related to potential conflicts between construction activities and pedestrians, transit, and autos. The Planning Commission may consider adopting this improvement measure as a condition of project approval.

Improvement Measure I-TR-I: Construction Measures

Traffic Control Plan for Construction – As an improvement measure to reduce potential conflicts between construction activities and pedestrians, transit and vehicles at the project site, the contractor could prepare a traffic control plan for the project construction period. The project sponsor and construction contractor(s) would meet with DPW, SFMTA, the Fire Department, Muni Operations and other City agencies to coordinate feasible measures to reduce traffic congestion, including temporary transit stop relocations (not anticipated, but if determined necessary) and other measures to reduce potential traffic and transit disruption and pedestrian circulation effects during construction of the proposed project. This review would consider other ongoing construction in the project area, such as construction of the planned CPMC Cathedral Hill medical campus. The contractor would be required to comply with the *City of San Francisco's Regulations for Working in San Francisco Streets*, which establish rules and permit requirements so that construction activities can be done safely and with the lowest level of possible conflicts with pedestrians, bicyclists, transit and vehicular traffic. As part of this effort, alternate construction staging locations could be identified and assessed.

Carpool and Transit Access for Construction Workers – As an improvement measure to minimize parking demand and vehicle trips associated with construction workers, the construction contractor could include methods to encourage carpooling and transit access to the project site by construction workers in the Construction Management Plan.

Project Construction Updates for Adjacent Businesses and Residents – As an improvement measure to minimize construction impacts on access to nearby institutions and businesses, the project sponsor could provide existing residential tenants, 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, parking lane and sidewalk closures. Existing tenants of 1333 Gough Street could be notified of arrangements for alternate parking access and facilities during the construction period, and building management would be available to address questions related to circulation, pedestrian or vehicular access, parking and construction activities. The construction contractor could create a web site for the proposed project that would provide current construction information of interest to neighbors, as well as contact information for specific construction inquiries or concerns. In addition, the project sponsor could maintain a log of neighborhood and resident complaints received related to construction activities, with

the date/time/complainant name and contract information, as well as the response/resolution of the complaint. This log would be provided to the Planning Department and/or the Building Department upon request.

Implementation of **Improvement Measure I-TR-I** would not result in any secondary transportation-related impacts.

PARKING DISCUSSION

San Francisco does not consider parking supply as part of the permanent physical environment and therefore does not consider changes in parking conditions to be environmental impacts as defined by CEQA. As explained in **Section 4.A, Introduction**, pp. 4.A.1-4.A.3, SB 743 eliminated the analysis of parking, which can no longer be considered in determining significant transportation and circulation effects for infill residential projects in transit priority areas. The San Francisco Planning Department acknowledges, however, that parking conditions may be of interest to the public and the decision-makers; therefore, parking is analyzed here for informational purposes.

Parking Supply and Demand

The proposed four-level subsurface parking garage would include a total of 442 parking spaces. One portion would serve the residents of the proposed 1481 Post Street building and would contain 262 parking spaces. The other portion would replace the parking for the existing 1333 Gough Street building lost as a result of the demolition of the existing parking structure and surface parking lots (169 residential spaces and 7 visitor spaces). The parking program would also include 4 new carshare spaces accessible to the public. In order to access the visitor and carshare parking spaces, visitor and carshare vehicles would enter the project site via the new two-way, 24-foot-wide Post Street driveway or the modified Gough Street driveway at the northeast corner of the project site. These vehicles would proceed down the ramp to the 1333 Gough Street portion of the parking garage and reach the visitor and carshare parking area before reaching the gate to the 1333 Gough Street residential parking area. Pedestrians could access these visitor and carshare spaces via stairs from the Gough Street sidewalk. Signage would direct pedestrians to the doorman of the 1333 Gough Street building who would control access to the stairs for security purposes. Signage would also identify the visitor and carshare parking spaces.

The proposed new driveways, the proposed elimination of existing driveways, the proposed on-street loading space, and the proposed corner and midblock pedestrian bulbs would result in the reconfiguration of the on-street parking spaces on Post Street, Gough Street, and Geary Boulevard fronting the project site. Under the proposed project the 39 existing on-street parking spaces fronting the project site would be permanently reduced to 18 spaces with the elimination

of 16 spaces along Post Street and 5 spaces along Geary Boulevard. The four existing on-street parking spaces along Gough Street would remain (i.e., the existing parking space eliminated by the proposed midblock pedestrian bulb would be offset by a new parking space gained by eliminating the existing, two-way, 27-foot-wide driveway along Gough Street at the southeast corner of the project site). The sidewalk widening into the parking lanes on Post Street, Gough Street, and Geary Boulevard fronting the project site under each of the variants would result in the elimination of all 39 existing on-street parking spaces (as compared to elimination of 21 spaces with the proposed project).

Off-Street Parking Requirements under the Planning Code

Planning Code §151 requires one off-street parking space per dwelling unit in RM-4 zoning districts. Off-street parking would not be required for the proposed project's café/restaurant use because the café/restaurant uses would be less than 5,000 gsf. Planning Code §155(i) requires that one handicap-accessible parking space be provided for each 25 off-street parking spaces provided. Planning Code §166 requires two car-share spaces for 201 or more residential dwelling units, plus one car-share space for every 200 dwelling units over 200. The proposed project or its variants would include 262 parking spaces, 13 handicap-accessible parking spaces within the first and second levels of the 1481 Post Street portion of the parking garage, and four car-share spaces within the 1333 Gough Street portion of the parking garage. The proposed project or its variants would, therefore, meet the minimum Planning Code requirements for off-street parking spaces. In addition, seven handicap-accessible parking spaces would be provided within the first level of the 1333 Gough Street portion of the parking garage.

Planning Code §167 requires that the sale of parking spaces be unbundled from the sale of the residential units. The proposed project or its variants would meet this requirement for the 1481 Post Street building.

Parking Supply vs. Demand

As discussed on pp. 4.C.35-4.C.36 under "Approach to Analysis" and as presented in **Table 4.C.14** on p. 4.C.36, the proposed project or its variants would generate a total weekday midday and evening parking demand for 274 and 339 long-term spaces, respectively. The café/restaurant and expanded fitness center uses would generate a total weekday midday parking demand for 21 off-street parking spaces. Overall, the proposed project or its variants would generate a new parking demand for 294 spaces during the weekday midday and for 339 spaces during the weekday evening.

Table 4.C.19: Net-New Parking Demand and Supply presents the proposed project's or variant's parking supply and demand comparisons for the overnight and midday periods. In addition to the parking demand generated by the proposed land uses, the proposed project would

result in a net loss of 21 on-street parking spaces (16 along Post Street and 5 along Geary Boulevard). Each of the variants would result in a net loss of 39 on-street parking spaces due to the sidewalk widening into the Post Street, Gough Street, and Geary Boulevard parking lanes adjacent to the project site. The demand associated with these on-street spaces would need to be accommodated elsewhere on-street or in off-street facilities.

Table 4.C.19: Net-New Parking Supply and Demand ^a

Analysis Period/Land Use	Supply	Demand	(Shortfall)/Surplus
Midday			
Residential	262	271	(9)
Fitness Center and Café/Restaurant	0	24	(24)
Midday Total	262	295	(33)
Overnight			
Residential	262	339	(77)

Note:

^a Parking supply and demand associated with the existing 169 residential units not included, as these uses would not change from existing conditions.

Sources: SF Guidelines 2002; LCW Consulting, 2014

Overnight Demand

The long-term residential parking demand generally occurs during the overnight hours. The residential demand of 339 spaces would not be accommodated within the residential parking supply of 262 parking spaces, which would result in an unmet parking demand of 77 parking spaces. The overnight unmet parking demand could be accommodated by the parking spaces on nearby streets, as existing parking occupancy within the study area during the evening is about 81 percent. If the unmet parking demand associated with the proposed project, combined with the net loss of 21 on-street parking spaces (i.e., a total unmet parking demand of 98 spaces), were met within on-street spaces, the overnight occupancy would increase from 81 to 89 percent.

Under each of the variants, the elimination of 39 on-street parking spaces due to the sidewalk widening into adjacent parking lanes along Post Street, Gough Street, and Geary Boulevard would increase the unmet parking demand from that identified for the proposed project. The overnight unmet parking demand for each of the variants would increase from a total of 98 spaces with the proposed project (a residential unmet parking demand of 77 spaces, and an elimination of 21 on-street spaces), to 116 spaces (a residential unmet parking demand of 77 spaces, and an elimination of 39 on-street spaces). If the unmet parking demand associated with each of the variants were met within other on-street spaces in the area, the overnight parking occupancy would increase from 81 to 91 percent.

The residential unmet parking demand associated with the proposed project or its variants could also be accommodated in nearby off-street facilities such as the Japan Center Garage. In addition, the area is well served by public transit, and bicycle and pedestrian facilities.

Midday Demand

During the weekday midday, the net-new residential parking demand is estimated to be about 80 percent of the overnight parking demand, or about 271 spaces. In addition, during the weekday midday, the café/restaurant and fitness center uses would generate a net-new short-term and long-term parking demand for 24 spaces, for a total combined midday demand of 295 spaces. Since the proposed project or its variants would provide 262 residential parking spaces, there would be a residential parking shortfall of 9 parking spaces (271 space midday demand less the 262 space supply) during the midday period. The proposed project or its variants would have a total midday unmet parking demand of about 33 parking spaces. Combined with the net-loss of 21 on-street parking spaces, the proposed project would result in a net-new unmet parking demand during the midday of 54 parking spaces. Each of the variants would result in a net-new unmet parking demand during the midday of 72 parking spaces.

Drivers would need to park elsewhere in the area (either on-street or within the Japan Center Garage), which would increase the midday parking occupancy in the area. Due to difficulty in finding on-street parking in the study area during the day, some drivers may park outside of the study area, switch to transit, carpool, bicycle or other forms of travel. The project site is outside of the “G” and “R” Residential Permit Parking areas, and therefore residents would not be eligible to receive permits. It is possible that residents could apply to have the boundaries expanded to include the project site in the future. In addition, the area is well served by public transit, and bicycle and pedestrian facilities.

Conclusion

The unmet overnight and midday parking demand associated with the proposed project or its variants could be accommodated on-street and in nearby off-street facilities. Because the project site is in an area that is well served by public transit, and bicycle and pedestrian facilities, and garage operations under the proposed project or its variants would not affect Muni bus operations on Post Street or Geary Boulevard, the proposed project or its variants would not create hazardous conditions or significant delays affecting traffic, transit, bicycles or pedestrians.

In summary, parking supply is not considered a permanent physical condition in San Francisco, and changes in the parking supply would not be a significant environmental impact under CEQA. The secondary effects of drivers searching for parking is typically offset by a reduction in vehicle trips due to some drivers, who are aware of constrained parking conditions in a given area, shifting to transit, bicycling, and walking. Hence, any secondary environmental impacts that may result from the unmet parking demand of the proposed project or its variants have been addressed in the transportation analysis conducted for the proposed project and its variants and would not be a considerable environmental effect.

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 or its variants would affect the transportation network in conjunction with overall citywide growth and other reasonably foreseeable future projects within a ¼-mile radius of the project site (i.e., the CPMC Cathedral Hill medical campus at 1101 Van Ness Avenue / 1255 Post Street, 1634-1690 Pine Street, 1527-1545 Pine Street, 1800 Van Ness Avenue / 1749 Clay Street). See **Section 4.A, Introduction**, pp. 4.A.6-4.A.7 for a more detailed description of these projects.

In addition to the reasonably foreseeable future projects, the cumulative analysis includes the following transportation network changes.

Transit Effectiveness Project

The Transit Effectiveness Project (TEP) presents a thorough review of San Francisco's public transit system, initiated by SFMTA in collaboration with the City Controller's Office. The TEP is aimed at improving reliability, reducing travel times, providing more frequent service and updating Muni bus routes and rail lines to better match current travel patterns. The Planning Department published a Draft EIR on July 12, 2013; the Final EIR was certified by the Planning Commission on March 27, 2014. The SFMTA Board of Directors approved the TEP on March 28, 2014. The TEP components will be implemented based on funding and resource availability. It is anticipated that the first group of service improvements will be implemented in Fiscal Year 2015 and the second group in a subsequent phase.³² TEP recommendations include new routes and route realignments, more service on busy routes, and elimination or consolidation of certain routes or route segments with low ridership. The following changes are proposed by the TEP for routes in the vicinity of the project site:³³

- 2 Clement – The AM and PM peak period frequencies east of Presidio Avenue will change from 12 to 7.5 minutes.
- 3 Jackson – The AM peak period frequency will change from 13.5 to 15 minutes, while the PM peak period frequency will change from 12 to 15 minutes.

³² San Francisco Planning Department, Transit Effectiveness Project Final EIR, certified March 27, 2014, Case File No. 2011.0558E. Available online at <http://www.sf-planning.org/index.aspx?page=2970#downloads>. Accessed February 5, 2014.

³³ SFMTA, Transit Effectiveness Project Implementation Workbook. Available online at <http://www.sfmta.com/fr/news/project-updates/tep-implementation-workbook-outreach-summary-now-available>. Accessed June 23, 2014.

- 22 Fillmore – All-day and more frequent service will be introduced on this route to shorten wait times and reduce crowding. Transit improvements such as construction of new transit bulbs and stop optimization would be implemented as part of the TEP's travel time reduction proposals. Other improvements would include a reroute east along 16th to Third streets to improve connections to Mission Bay from the Mission. The segment along Connecticut and 18th streets would be replaced by a rerouted 33 Stanyan. The bus would no longer layover on 20th Street between Third and Tennessee streets.
- 38 Geary – No route changes are proposed; however, midday frequency would change from 16 to 15 minutes west of 33rd Avenue. Changes to this route will be coordinated with the Geary Corridor Bus Rapid Transit (BRT) Study currently underway. The proposed Geary Corridor BRT project is subject to its own environmental review (see description of the Geary Corridor BRT project below under "Other Transit Improvement Projects in the Area).
- 38L Geary Limited – No route changes are proposed; however, midday frequency will change from 5.5 to 5 minutes, and limited-stop service will be expanded to include Sundays. Changes to this route would be coordinated with the Geary Corridor BRT Study (see description of the Geary Corridor BRT project below).
- 47 Van Ness – Route will be realigned. Route will terminate at Van Ness Avenue and North Point Street and will share a terminal with the 49L Van Ness-Mission Limited. A common terminal for both routes serving Van Ness Avenue will improve reliability by allowing route management from a single point; North Point segment will be covered by new Route 11 Downtown Connector. The midday frequency will change from 10 to 9 minutes, and the proposed route change will coordinate with the Van Ness Avenue BRT project (see description of the Van Ness Avenue BRT project below).
- 49L Van Ness-Mission Limited – The existing route will be redesigned and rebranded as the 49L Van Ness-Mission Limited (as proposed in the Van Ness Avenue BRT project), making local stops on Van Ness Avenue and on Ocean Avenue and limited stops on Mission Street.

Other Transit Improvement Projects in the Project Area

The San Francisco County Transportation Authority (SFCTA) and the SFMTA are currently conducting the *Van Ness Avenue Bus Rapid Transit Study* and the *Geary Corridor Bus Rapid Transit Study*.³⁴

Van Ness Avenue Bus Rapid Transit Project

The Van Ness Avenue BRT Project is a program to improve Muni bus service along Van Ness Avenue between Mission and Lombard streets through the implementation of operational and physical improvements. The operational improvements consist of designating bus-only lanes to allow buses to travel with fewer impediments, adjusting traffic signals to give buses more green

³⁴ Bus Rapid Transit refers to a transportation system that, through improvements to infrastructure, vehicles and scheduling, attempts to use buses to provide a service that is of a higher quality than an ordinary bus route.

light time at intersections, and providing real-time bus arrival and departure information to passengers to allow them to manage their time more efficiently. The physical improvements consist of building high-quality and well-lit bus stations to improve passenger safety and comfort, and providing streetscape improvements and amenities to make the street safer and more comfortable for pedestrians and bicyclists who access the transit stations. As indicated above, the existing 49 Van Ness-Mission would be redesigned and rebranded as the 49L Van Ness-Mission Limited, making local stops on Van Ness Avenue and on Ocean Avenue and limited stops on Mission Street. On December 20, 2013 the Federal Transit Administration issued a Record of Decision for the Van Ness Avenue BRT Project, determining that the requirements of the National Environmental Policy Act (NEPA) have been met through the Final Environmental Impact Statement (EIS) document and process.³⁵ BRT service is expected to begin on Van Ness Avenue by early 2018.

Geary Corridor Bus Rapid Transit Project

The Geary Corridor BRT Project is a program to improve Muni bus service along the Geary corridor between the new Transbay Transit Center (under construction) and the Pacific Ocean through the implementation of operational and physical improvements. The proposed operational improvements consist of designating bus-only lanes to allow buses to travel with fewer impediments, adjusting traffic signals to give buses more green light time at intersections and optimizing traffic signals along the corridor, providing all-door boarding and low-floor vehicles, providing pedestrian safety enhancements such as reducing crossing distances on streets where transit stations are located, and providing high-quality and well-lit transit stations to improve passenger safety and comfort. Year 2040 cumulative analysis assumes conversion of one of the three mixed-flow travel lanes on Geary Boulevard to a transit-only lane. Existing bus service along the Geary corridor would remain, except the 38L Geary Limited would be redesigned and rebranded as the BRT. The project is currently undergoing environmental review, and, depending on the alternative selected and funding availability, BRT service is expected to begin along the Geary corridor around 2019.

Polk Street Improvement Project

The Polk Street Improvement Project is currently being designed by SFMTA with input from the community. The Polk Street Improvement Project will develop and implement a streetscape design that creates a thriving and active corridor, enhance the pedestrian experience, complement bicycle and transit mobility, and support commercial activities. The project extends between

³⁵ SFCTA, *Van Ness Avenue Bus Rapid Transit Project Final Environmental Impact Statement/Environmental Impact Report*, July 2013 (State Clearinghouse Number 2007092059). Available online at <http://www.sfcta.org/van-ness-avenue-bus-rapid-transit-environmental-review>. Accessed February 5, 2014.

Union and McAllister streets, with these two project segments designed to reflect different rights-of-way, grades, and identified needs (i.e., Polk Street between Union and California streets, and Polk Street between California and McAllister streets). Recommendations to date include cycle tracks, buffered bicycle lanes, green bicycle lanes, tow-away regulations to provide space for cars and bicycles to share the road, removing on-street parking, and restricting parking at intersections to improve visibility of pedestrians. Designs for two segments are being reviewed and refined based on a community meeting in July 2013, and ongoing meetings with merchants along Polk Street. Design and approvals will continue through 2014, and construction of improvements is currently anticipated for sometime in 2015.³⁶

Ellis/Eddy Traffic Calming Improvement Project

SFMTA will implement traffic calming and pedestrian safety improvements on Ellis and Eddy streets as proposed in the Tenderloin-Little Saigon Neighborhood Transportation Plan, including the one-way to two-way conversion of Eddy Street between Leavenworth and Cyril Magnin streets, and Ellis Street between Jones and Cyril Magnin streets; full signal upgrades at the intersections of Eddy/Taylor streets and Ellis/Taylor streets, including pedestrian countdown signals; and pedestrian bulbs at the intersection of Ellis/Taylor streets and Eddy/Leavenworth streets. Design engineering is currently underway, with construction anticipated to start in Spring 2015 and with the project completed in December 2015.³⁷

Methodology

Future 2040 cumulative traffic volumes were estimated based on cumulative development and growth identified by the SFCTA's San Francisco Chained Activity Model Process (SF-CHAMP) travel demand model, using model output that represents existing conditions and model output that represent 2040 cumulative conditions. In order to estimate 2040 Cumulative plus Project conditions, the projected traffic volume growth between existing and 2040 cumulative conditions at the study intersections was added to the traffic volumes for the 2040 cumulative conditions.

³⁶ SFMTA, Polk Street Improvement Project. Information available online at <https://www.sfmta.com/projects-planning/projects/polk-street-improvement-project>. San Francisco Planning Department, Polk Streetscape Project. Information available online at <http://www.sf-planning.org/index.aspx?page=3579#boards>. Accessed March 31, 2014.

³⁷ Phase I of the Ellis/Eddy Two-Way Conversion was implemented in 2011 with the one-way westbound Ellis Street converted to a two-way street between Polk and Jones streets, and the one-way eastbound Eddy Street converted to a two-way street between Larkin and Leavenworth streets.

Cumulative Traffic Impacts

Impact C-TR-1: The proposed project or its variants in combination with past, present and reasonably foreseeable future development would not contribute considerably to significant cumulative traffic impacts. (*Less than Significant*)

Year 2040 cumulative traffic volumes were estimated based on cumulative development and growth identified by the SFCTA SF-CHAMP travel demand model, using model output that represents existing conditions and model output for 2040 cumulative conditions. For this project analysis, in order to estimate 2040 Cumulative plus Project conditions, the projected traffic volume growth between existing and 2040 cumulative conditions at the study intersections, was added to the existing traffic volumes. As noted above, the 2040 cumulative traffic volumes take into consideration implementation of the Van Ness Avenue and Geary Corridor BRT projects, which would reduce capacity on Van Ness Avenue and Geary Boulevard in order to accommodate transit-only lanes among other improvements.

Table 4.C.20: Intersection LOS for Existing and 2040 Cumulative Conditions – Weekday AM and PM Peak Hours presents the existing and 2040 cumulative intersection LOS for the weekday AM and PM peak hour conditions. During the weekday AM peak hour, all three study intersections would operate acceptably (i.e., LOS D or better). During the weekday PM peak hour, all the study intersections would operate acceptably except one (the intersection of Franklin and O’Farrell streets), which would operate at LOS E.

The contributions of the proposed project or its variants to the cumulative traffic volumes at the critical movements operating poorly (i.e., at LOS E or LOS F) for the intersection of Franklin and O’Farrell streets in 2040 were calculated to determine whether the contributions to the 2040 LOS E operating conditions would be considered significant. Under 2040 cumulative conditions for the weekday PM peak hour, the northbound through/right movement would be the critical movement that would operate poorly at this intersection. The proposed project or its variants would contribute 17 vehicles to the northbound through/right movement at this intersection, which would be a 0.5 percent contribution to the critical movement volumes. The proposed project or its variants would not contribute considerably to this approach.

Overall, the poor operating conditions during the weekday PM peak hours at the intersection of Franklin/O’Farrell streets under 2040 cumulative conditions would be primarily due to background traffic growth along Franklin Street. Because the proposed project or its variants would not result in a considerable contribution to the poor operating conditions, the cumulative traffic impacts of the proposed project or its variants at this intersection would be considered less than significant. No mitigation is necessary.

Table 4.C.20: Intersection LOS for Existing and 2040 Cumulative Conditions – Weekday AM and PM Peak Hours

Intersection	Existing		2040 Cumulative	
	Delay ^a	LOS	Delay	LOS
Weekday AM Peak Hour				
1. Van Ness/Post	18.0	B	20.0	C
2. Van Ness/Geary	20.3	C	24.1	C
3. Van Ness/O'Farrell	27.9	C	30.6	C
Weekday PM Peak Hour				
1. Van Ness/Post	14.0	B	20.1	C
2. Van Ness/Geary	19.0	B	41.0	D
3. Van Ness/O'Farrell	20.5	C	18.4	B
4. Franklin/Post	11.0	B	27.0	C
5. Franklin/Geary	36.0	D	10.9	B
6. Franklin/O'Farrell	39.2	D	68.2	E
7. Gough/Post	17.7	B	17.7	B
8. Gough/Geary	39.8	D	36.2	D
9. Laguna/Post	13.7	B	15.5	B
10. Laguna/Geary	22.9	C	22.5	C

Notes:

^a Delay presented in seconds per vehicle.

^b Signalized intersection operating at LOS E or LOS F highlighted in **bold**.

Source: LCW Consulting, 2014

Cumulative Transit Impacts

Impact C-TR-2: The proposed project or its variants in combination with past, present and reasonably foreseeable development would not contribute to significant cumulative transit impacts on local or regional transit capacity. (*Less than Significant*)

Muni

The 2040 cumulative transit screenline analysis accounts for ridership and/or capacity changes associated with the TEP, the 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 ferry service. Existing and 2040 cumulative conditions for the weekday PM peak hour for the Muni screenlines are presented in **Table 4.C.21: Muni Screenline Analysis for Existing and 2040 Cumulative Conditions – Weekday PM Peak Hour**. The 2040 cumulative transit screenline analysis was developed by SFMTA based on the SFCTA travel demand model analysis. Forecasted future hourly ridership demand was then compared to expected hourly capacity, as determined by the likely route and headway changes identified in the TEP to estimate capacity utilization for 2040 cumulative conditions. The future 2040 cumulative

analysis assumes changes to the capacity of the routes as identified by route changes and headway changes indicated within the recommended TEP.

As indicated in **Table 4.C.21** for 2040 cumulative conditions during the weekday 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 on the California, Sutter/Clement, and Fulton/Hayes corridors within the Northwest screenline, and on the Mission and San Bruno/Bayshore corridors within the Southeast screenline, would increase and exceed the 85 percent capacity utilization standard during the weekday PM peak hour.

Table 4.C.21: Muni Screenline Analysis for Existing and 2040 Cumulative Conditions – Weekday PM Peak Hour

Screenline/Corridor	Existing			2040 Cumulative		
	Ridership	Capacity	Utilization	Ridership	Capacity	Utilization
Northeast						
Kearny/Stockton	2158	3,291	65.6%	6,295	8,329	75.6%
Other	570	1,078	52.9%	1,229	2,065	59.5%
<i>Subtotal</i>	<i>2,728</i>	<i>4,369</i>	<i>62.4%</i>	<i>7,524</i>	<i>10,394</i>	<i>72.4%</i>
Northwest						
Geary	1,814	2,528	71.8%	2,996	3,621	82.7%
California	1,366	1,686	81.0%	1,766	2,021	87.4%
Sutter/Clement	470	630	74.6%	749	756	99.1%
Fulton/Hayes	965	1,176	82.1%	1,762	1,878	93.8%
Balboa	637	929	68.6%	776	974	79.7%
<i>Subtotal</i>	<i>5,252</i>	<i>6,949</i>	<i>75.6%</i>	<i>8,049</i>	<i>9,250</i>	<i>87.0%</i>
Southeast						
Third	550	714	77.0%	2,300	5,712	40.3%
Mission	1,529	2,789	54.8%	2,673	3,008	88.9%
San Bruno/Bayshore	1,320	2,134	61.9%	1,817	2,134	85.1%
Other	1,034	1,712	60.4%	1,582	1,927	82.1%
<i>Subtotal</i>	<i>4,433</i>	<i>7,349</i>	<i>60.3%</i>	<i>8,372</i>	<i>12,781</i>	<i>65.5%</i>
Southwest						
Subway	4,747	6,294	73.1%	5,692	6,804	83.7%
Haight/Noriega	1,105	1,651	66.9%	1,265	1,596	79.3%
Other	276	700	39.4%	380	840	45.2%
<i>Subtotal</i>	<i>6,128</i>	<i>8,645</i>	<i>70.9%</i>	<i>7,337</i>	<i>9,240</i>	<i>79.4%</i>
Total All Screenlines	18,541	27,312	67.9%	31,282	41,665	75.1%

Source: SF Planning Department, 2014

The proposed project or its variants would generate 187 net-new transit trips during the weekday PM peak hour, and would contribute to ridership on the Northwest screenline and the Geary and Sutter/Clement corridors. The contributions of the proposed project or its variants to ridership on the screenlines and corridors operating at greater than the 85 percent capacity utilization standard would be less than two percent of the 2040 transit ridership on those screenlines and corridors. Therefore, the proposed project or its variants would result in a less-than-significant contribution

to 2040 cumulative transit conditions on the Northwest and Southeast screenlines. Furthermore, SFMTA would, over time and as part of their operational practices, continue to monitor Muni service citywide and report 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.

Regional Transit

Table 4.C.22: Regional Screenline Analysis for Existing and 2040 Cumulative Conditions – Weekday PM Peak Hour provides a comparison of the existing and 2040 cumulative transit ridership and capacity utilization for each of the regional transit screenlines and regional transit service providers. All regional transit service providers are projected to operate under their respective capacity utilization standards in 2040 during the weekday PM peak hour. The proposed project or its variants would add 26 net-new transit trips to the regional transit providers (ten trips to the East Bay, eight trips to the North Bay, and eight trips to the South Bay). The contributions of the proposed project or its variants to the regional transit screenlines would not be considerable and would not contribute to any significant cumulative regional transit impacts.

Table 4.C.22: Regional Screenline Analysis for Existing and 2040 Cumulative Conditions – Weekday PM Peak Hour

Screenline/Corridor	Existing			2040 Cumulative		
	Ridership	Capacity	Utilization	Ridership	Capacity	Utilization
East Bay						
BART	19,716	22,050	89.4%	30,383	33,170	91.6%
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%
<i>Subtotal</i>	<i>22,777</i>	<i>27,591</i>	<i>82.6%</i>	<i>42,702</i>	<i>51,110</i>	<i>83.5%</i>
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%
<i>Subtotal</i>	<i>2,352</i>	<i>4,776</i>	<i>49.2%</i>	<i>3,689</i>	<i>4,776</i>	<i>77.2%</i>
South Bay						
BART	10,682	14,910	71.6%	13,971	24,182	57.8%
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%
<i>Subtotal</i>	<i>13,200</i>	<i>18,330</i>	<i>72.0%</i>	<i>16,709</i>	<i>28,302</i>	<i>59.0%</i>
Total All Screenlines	38,330	50,697	75.6%	63,100	84,188	75.0%

Source: SF Planning Department, 2013

Conclusion

For the above reasons, the proposed project or its variants, in combination with past, present and reasonably foreseeable future development, would not contribute considerably to any significant cumulative impacts on local and regional transit capacity.

Implementation of **Improvement Measures I-TR-A: Monitoring and Abatement of Queues and Conflicts, I-TR-G: Coordination of Move-In/Move-Out Activities and Large Deliveries, and I-TR-H: PM Peak Period Off-Street Loading Access Restrictions** would ensure that vehicular access to and from the project site via Post Street and into the service area/truck loading area via Geary Boulevard would not affect Muni bus operations.

Cumulative Pedestrian Impacts

Impact C-TR-3: The proposed project or its variants in combination with past, present and reasonably foreseeable future development in the project vicinity would not contribute considerably to any significant cumulative pedestrian impacts. (*Less than Significant*)

Pedestrian circulation impacts by their nature are site-specific and generally do not contribute to impacts from other development projects. The proposed project or its variants would not result in overcrowding of sidewalks or create new potentially hazardous conditions for pedestrians under existing or 2040 cumulative conditions. On the contrary, the proposed project or its variants would improve pedestrian circulation adjacent to the project site by widening the sidewalks, and would provide additional common pedestrian/open space, consistent with the *Better Streets Plan*. Additionally, as discussed above on p. 4.C.15, in late 2014, SFMTA will install pedestrian flashing beacons at the midblock crosswalk on Post Street between Laguna and Post streets (i.e., at the location of the Octavia Street right-of-way). The flashing beacons will be pedestrian activated and will flash yellow when activated via push buttons. After flashing for a predetermined amount of time, the beacons will turn off until the next activation. The project variants include sidewalk widening into the adjacent parking lane on Post Street, Gough Street, and Geary Boulevard and would result in wider sidewalks than under the proposed project. Walk trips may increase between the completion of the proposed project and 2040 due to growth in the project vicinity and implementation of the proposed project or its variants, including **Improvement Measure I-TR-B: Transportation Demand Management Plan**, which was identified in the TIS to reduce project-generated vehicle trips. Because transit users would walk between the transit stops and the project site, Transportation Demand Management (TDM) measures such as promoting effective use of transit could, over time, increase the number of pedestrians accessing the project site, although not to the level which would induce overcrowding of sidewalks in 2040 cumulative conditions.

At most of the study intersections, there is a projected increase in background vehicle traffic between Existing plus Project and 2040 cumulative conditions, although with implementation of the planned Van Ness Avenue BRT and Geary Corridor BRT projects, which would eliminate one mixed-flow travel lane in each direction on Van Ness Avenue and Geary Boulevard, traffic volumes on Van Ness Avenue and Geary Boulevard would be similar to or less than under existing conditions. The overall increase in traffic volumes under 2040 cumulative conditions would result in an increase in the potential for vehicle-pedestrian conflicts at intersections in the study area. While a general increase in vehicle traffic through 2040 is expected due to cumulative development, the proposed project or its variants would not create potentially hazardous conditions for pedestrians, or otherwise interfere with pedestrian accessibility to the site and adjoining areas. This is because future traffic volumes are expected to remain low to moderate (i.e., about 92 vehicles in the westbound direction [one travel lane] and about 464 vehicles in the eastbound direction [two travel lanes] during the weekday PM peak hour, and lower during non-peak periods), and because the proposed driveways into the below-grade parking garages for the 1481 Post Street and 1333 Gough Street buildings would be set back from the north property line and the right-of-way by more than 45 feet, creating space for vehicles entering and exiting the project site to queue on site as opposed to in the public right-of-way. Therefore, the proposed project or its variants, in combination with past, present and reasonably foreseeable development in San Francisco, would not contribute considerably to any significant cumulative pedestrian impacts.

Cumulative Bicycle Impacts

Impact C-TR-4: The proposed project or its variants in combination with past, present and reasonably foreseeable future development in the project vicinity would not contribute considerably to any significant cumulative bicycle impacts. (*Less than Significant*)

The proposed project or its variants would not significantly contribute to cumulative bicycle circulation impacts in the area; although some of the project-related travel demand would occur by bicycle. Bicycle trips in the vicinity of the project site may increase between project implementation and 2040 due to general growth in the area and implementation of **Improvement Measure I-TR-B: Transportation Demand Management Plan**, which was identified in the TIS to reduce project-generated vehicle trips. In particular, elements of the proposed project or its variants and implementation of improvement measures that would require that the points of access to bicycle parking include signage indicating the location of these facilities, avoiding conflicts with private cars accessing the garage and trucks accessing the loading area, and facilitating access to the Post Street bicycle route through on-site signage, would all serve to increase bicycling trips over time, although not to the level that would create potentially hazardous conditions for bicycles. In addition, implementation of the proposed Polk Street

Improvement Project by SFMTA would enhance conditions for bicyclists on the segment of Polk Street between Union and McAllister streets. Preliminary designs of the improvements are currently being developed, and the improvements are projected to be implemented around 2015.

The projected increase in vehicles at many of the study intersections in the vicinity of the project site under 2040 cumulative conditions may result in an increase in vehicle-bicycle conflicts at intersections and driveways in the study area. Although the number of vehicle trips into and out of the project site would not change with the proposed variants, under Variant B and Variant C there would be two driveways on Post Street rather than three driveways as in the proposed project and Variant A. Thus, under Variants B and C there would be a reduction in the number of conflict points between project-related vehicles entering and exiting the project site and bicyclists using the Class III bicycle route on Post Street compared to the proposed project and Variant A. While a general increase in vehicle traffic is expected by 2040, the proposed project or its variants would not create potentially hazardous conditions for bicycles, or otherwise interfere with bicycle accessibility to the site and adjoining areas, or substantially affect the Class III bicycle route on Post Street. Therefore, the proposed or its variants, in combination with past, present and reasonably foreseeable future development in the project vicinity, would not contribute considerably to any significant cumulative impacts on bicyclists.

Cumulative Loading Impacts

Impact C-TR-5: The proposed project or its variants in combination with past, present and reasonably foreseeable future development in the project vicinity would not contribute considerably to any significant cumulative loading impacts. (*Less than Significant*)

Loading impacts, like pedestrian impacts, are by their nature localized and site-specific, and would not contribute to impacts from other reasonably foreseeable projects in the vicinity of the project site. Moreover, the proposed project would not result in loading impacts, as the estimated loading demand would be met on-site at the proposed service area/truck loading area. In addition, the project sponsor would request that on-street curb space on Post Street between the proposed inbound and outbound driveways for the 1481 Post Street building be designated as a commercial loading space. Under the project variants, which would widen the Post Street sidewalk into the adjacent parking lane, an on-street commercial loading space would not be provided on Post Street. Instead small trucks and service delivery vehicles would enter and exit the project site from the Post Street driveways for deliveries to the café/restaurant and for parcel deliveries (e.g., UPS, Federal Express) for the residential units. Therefore, the proposed project or its variants, in combination with past, present and reasonably foreseeable future development in the project vicinity, would not contribute considerably to any significant cumulative loading impacts.

Cumulative Emergency Vehicle Access Impacts

Impact C-TR-6: The proposed project or its variants in combination with past, present and reasonably foreseeable future development in the project vicinity would not contribute considerably to any significant cumulative emergency vehicle access impacts. (*Less than Significant*)

The proposed project or its variants would not contribute considerably to cumulative emergency vehicle access impacts in the area. With implementation of the proposed project or its variants, emergency vehicle access to the project site would remain unchanged from existing conditions. With implementation of the Van Ness Avenue and Geary BRT projects, transit-only lanes would be added to Van Ness Avenue and to Geary Boulevard in the vicinity of the project site, which would result in a reduction of one mixed-flow lane in each direction on Van Ness Avenue and Geary Boulevard. With implementation of transit-only lanes and changes to the number of travel lanes on streets in the vicinity of the project site, emergency service providers may adjust travel routes to respond to incidents; however, emergency vehicle access in the area would not be substantially affected. Emergency vehicles would be permitted full use of transit-only lanes and would not be subject to any turn restrictions. Therefore, the proposed project or its variants, in combination with past, present and reasonably foreseeable development in San Francisco, would not contribute considerably to any significant cumulative emergency vehicle access impacts.

Cumulative Construction Impacts

Impact C-TR-7: The proposed project or its variants in combination with past, present and reasonably foreseeable future development in the project vicinity would not contribute considerably to any significant cumulative construction-related transportation impacts. (*Less than Significant*)

The construction of the proposed project or its variants may overlap with the construction of other reasonably foreseeable projects listed on pp. 4.A.6-4.A.7, including the 1634-1690 Pine Street and 1527-1545 Pine Street projects, although the timing of construction for those projects is not currently known. The CPMC's Cathedral Hill medical campus project at 1101 Van Ness Avenue/1255 Post Street and the 1800 Van Ness Avenue/1749 Clay Street project are currently under construction. In addition, streetscape improvements associated with the Geary Corridor and Van Ness BRT projects will be implemented, with BRT service expected to begin on Van Ness Avenue by early 2018 and along the Geary Corridor by early 2019.³⁸

Overall, localized cumulative construction-related transportation impacts could occur as a result of reasonably foreseeable projects in the vicinity of the project site that generate increased traffic

³⁸ San Francisco County Transportation Authority, Geary Corridor Bus Rapid Transit Overview. Available online at <http://www.sfcta.org/delivering-transportation-projects/geary-corridor-bus-rapid-transit-home>. Accessed March 24, 2014.

at the same time and on the same roads as the proposed project or its variants. The construction manager for each reasonably foreseeable project would work with the various departments of the City to develop a detailed and coordinated plan that would address construction vehicle routing, traffic control, and pedestrian movement adjacent to the construction area for the duration of any overlap in construction activity. **Improvement Measure I-TR-I: Construction Measures** (see pp. 4.C.63-4.C.64 under **Impact TR-7**) is identified in the TIS to reduce the proposed project's or variant's less-than-significant impacts related to potential conflicts between construction activities and pedestrians, transit, and autos, and includes provisions for construction truck traffic management, project construction updates for adjacent businesses and residents, and carpool and transit access for construction workers.

The cumulative impacts of multiple nearby construction projects would not be cumulatively considerable, as the construction would be of temporary duration, and the project sponsor would coordinate with various City departments such as SFMTA and DPW through the TASC to develop coordinated plans that would address construction-related vehicle routing and pedestrian movements adjacent to the construction area for the duration of construction overlap. Therefore, for the above reasons, the proposed project or its variants, in combination with past, present and reasonably foreseeable development in San Francisco, would result in less-than-significant cumulative construction-related transportation impacts.

D. NOISE

INTRODUCTION

Section 4.D, Noise, summarizes and incorporates the results of the *Environmental Noise Assessment* for the proposed project.¹ As discussed on p. 67 of the NOP/Initial Study (**Appendix A** to this EIR), 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 expose people residing or working on the project site to excessive airport or airstrip noise, and these issues are not addressed in this EIR.

This section explains how sound and vibration are characterized, describes existing acoustic and vibration conditions on and near the project site, and summarizes relevant regulations and standards as part of the Environmental Setting. The Impacts discussion evaluates project-related noise and vibration impacts and assesses the project's potential to expose sensitive receptors to noise or groundborne vibration or to generate noise levels exceeding applicable standards. Also assessed is the compatibility of proposed land uses with ambient noise levels. Mitigation measures that would reduce significant noise and vibration impacts are identified where appropriate.

ENVIRONMENTAL SETTING

FUNDAMENTALS OF ENVIRONMENTAL NOISE

The traditional definition of noise is “unwanted” sound. Sound becomes unwanted when it interferes with normal activities, such as sleep or conversation, or causes actual physical harm such as hearing loss. Sound is characterized by various parameters that describe the rate of oscillation (frequency) of sound waves in the air or in the ground (the latter is groundborne noise and is generally called vibration, discussed later in this section), the distance between successive troughs or crests in the wave, the speed that it travels, and the pressure level or energy content of a given sound. The sound pressure level has become the most common descriptor used to characterize the loudness of an airborne ambient sound, and the decibel (dB) scale is used to quantify sound intensity. Because sound can vary in intensity by over one million times within the range of human hearing, a logarithmic loudness scale is used to keep sound intensity numbers

¹ Brown-Buntin Associates, Inc., *Environmental Noise Assessment, 1333 Gough Street/1481 Post Street Project, San Francisco, California*, prepared for Aspen Environmental Group, August 29, 2013 (hereinafter referred to as “*Environmental Noise Assessment*”). This document is available for review at the San Francisco Planning Department, 1650 Mission Street, Suite 400, as part of Case File No. 2005.0679E.

at a convenient and manageable level. Since the human ear is not equally sensitive to all sound frequencies within the entire spectrum, human response is factored into sound descriptions in a process called “A-weighting,” expressed as “dBA.” 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. The noise levels presented herein are expressed in terms of dBA, unless otherwise indicated. **Table 4.D.1: Typical Sound Levels Measured in the Environment** shows some representative noise sources and their corresponding noise levels in dBA.²

Table 4.D.1: Typical Sound Levels Measured in the Environment

Examples of Common, Easily Recognized Sounds	Decibels (dBA) at 50 feet	Subjective Evaluations
Near Jet Engine	140	Deafening
Threshold of Pain (Discomfort)	130	
Threshold of Feeling – Hard Rock Band	120	
Accelerating Motorcycle (at a few feet away)	110	
Loud Horn (at 10 feet away)	100	Very Loud
Noisy Urban Street	90	
Noisy Factory	85	
School Cafeteria with Untreated Surfaces	80	Loud
Near Freeway Auto Traffic	60	Moderate
Average Office	50	
Soft Radio Music in Apartment	40	Faint
Average Residence Without Stereo Playing	30	
Average Whisper	20	Very Faint
Rustle of Leaves in Wind	10	
Human Breathing	5	
Threshold of Audibility	0	

Note:

Continuous exposure above 85 dBA is likely to degrade the hearing of most people. Range of speech is 50 to 70 dBA.

Source: U.S. Department of Housing and Urban Development, *The Noise Guidebook*, 1985

Planning for acceptable noise exposure must take into account the types of activities and corresponding noise sensitivity of land use types within the community. The sensitivity of land uses is a primary consideration when assessing the compatibility of surrounding uses and noise sources, as discussed in the “Regulatory Framework” under the *San Francisco General Plan* Environmental Protection Element (pp. 4.D.14-4.D.16). Sources of environmental noise in cities include traffic, construction, mechanical equipment, aircraft, entertainment, and human behavior.

² U.S. Department of Housing and Urban Development, *The Noise Guidebook*, 1985, p. 1. Available online at http://portal.hud.gov/hudportal/documents/huddoc?id=DOC_16414.pdf. Accessed August 12, 2013.

These sources are limited by federal, state and local law, but at high enough levels, urban noise can harm health and the quality of life.³

Annoyance generally occurs in reaction to newly introduced sources of noise that interrupt ongoing activities. Community annoyance is a summary measure of the general adverse reaction of people to noise that causes speech interference, sleep disturbance, or interference with the desire for a tranquil environment.⁴ People react to the duration of noise events, judging longer events to be more annoying than shorter ones, and transportation noise is usually a primary cause of community dissatisfaction. Construction noise or vibration also often generates complaints, especially during lengthy periods of heavy construction, when nighttime construction is undertaken to avoid disrupting workday activity, or when the adjacent community has no clear understanding of the extent or duration of the construction.⁵

Health Effects of Environmental Noise

The World Health Organization (WHO) is perhaps the best source of current knowledge regarding health impacts because European nations have continued to study noise and its health effects, while the U.S. Environmental Protection Agency (USEPA) all but eliminated its noise investigation and control program in the 1970s.⁶ Guideline levels established by USEPA include the following: sleep disturbance can occur at levels above 35 dBA; interference with human speech begins at about 60 dBA; and hearing damage can result from prolonged exposure to noise levels in excess of 85 to 90 dBA.⁷

According to WHO, sleep disturbance can occur when continuous indoor noise levels exceed 30 dBA or when intermittent interior noise levels reach 45 dBA, particularly if background noise is low. With a bedroom window slightly open (a reduction from outside to inside of 15 dB), the WHO criteria suggest that exterior continuous (ambient) nighttime noise levels should be 45 dBA or below, and short-term events should not generate noise in excess of 60 dBA. WHO also notes

³ San Francisco Department of Public Health (DPH), *A Citizen's Guide to Noise Prevention and Control*, October 2013. Available online at <http://www.sfdph.org/dph/files/EHSdocs/ehsNoise/GuideNoiseControl.pdf>. Accessed February 10, 2014.

⁴ Federal Transit Administration, *Transit Noise and Vibration Impact Assessment*, May 2006, pp. 2-13 to 2-17. Available online at www.fta.dot.gov/documents/FTA_Noise_and_Vibration_Manual.pdf. Accessed September 9, 2013.

⁵ Ibid. p. 12-1.

⁶ The *San Francisco General Plan* Land Use Compatibility Guidelines for Community Noise are from this era.

⁷ U.S. Environmental Protection Agency, *Information on Levels of Environmental Noise Requisite to Protect Public Health and Welfare with an Adequate Margin of Safety*, March 1974, Appendices C and D. A copy of this document is available for review at the San Francisco Planning Department, 1650 Mission Street, Suite 400, as part of Case File No. 2005.0679E.

that maintaining noise levels within the recommended levels during the first part of the night is believed to be effective for the ability to fall asleep.⁸

The project site is adjacent to a health center facility (The Sequoias, at 1400 Geary Boulevard), where the need to provide full-time nursing, assisted living, and senior care introduces noise-related health concerns other than nighttime sleep disturbance or daytime speech interference. Other potential health effects of noise identified by WHO include decreased performance for complex cognitive tasks such as reading, attention span, problem-solving, and memorization; physiological effects such as hypertension and heart disease (after many years of constant exposure to high noise levels, often affecting workers); and hearing impairment (again, generally after long-term occupational exposure, although possible due to shorter-term exposure to very high noise levels, for example, exposure several times a year to concert noise at 100 dBA). Finally, noise can cause annoyance and can trigger emotional reactions like anger, depression, and anxiety. Vulnerable groups that may be less able to cope with noise exposure include people with decreased personal abilities (old, ill, or depressed people); people with particular diseases or medical problems; people dealing with complex cognitive tasks, such as learning to read; people who are blind or who have hearing impairment; fetuses, babies, and young children; and the elderly in general. WHO reports that during daytime hours, few people are seriously annoyed by activities with noise levels below 55 dBA, or are moderately annoyed by activities with noise levels below 50 dBA. The importance of noise to receptors depends on both time and context. For example, long-term high noise levels from heavy traffic volumes can make conversation at a normal voice level difficult or impossible, while short-term peak noise levels occurring at night can disturb sleep. For any location where people normally sleep, including homes, hotels, hospitals, and nursing homes, a nighttime sensitivity to noise is presumed.

Attenuation of Noise

Distance affects how noise is received and heard; the further a receptor is from a source, the greater the amount of attenuation (decrease). Transportation noise sources that tend to be arranged linearly, such as roadway traffic, attenuate at a rate of 3.0 dBA to 4.5 dBA per doubling of distance from the source.⁹ Point sources of noise, including stationary, fixed, and idle mobile sources like idling vehicles or construction equipment, attenuate at a rate of 6.0 dBA to 7.5 dBA per doubling of distance from the source.

⁸ World Health Organization, *Guidelines for Community Noise*, 1999, Chapter 3, p. 46. Available online at <http://www.who.int/docstore/peh/noise/guidelines2.html>. Accessed August 12, 2013.

⁹ Natural attenuation as sound propagates is based on the inverse square law and equations for geometric spreading of noise waves over hard and soft surfaces. Geometric spreading is spherical for point sources and cylindrical for linear sources. The additional 1.5 dBA of attenuation is from ground-effect attenuation that occurs above soft absorptive ground (such as normal earth and most ground with vegetation). Over hard ground (such as concrete, stone, and very hard-packed earth) these effects do not occur. (U.S. Department of Housing and Urban Development, *The Noise Guidebook*, 1985, p. 24.)

Meaningful reductions or attenuation of noise levels can also be accomplished by “shielding” or providing a barrier, which may be in the form of an intervening structure or terrain. The amount of noise level reduction provided by a barrier close to a source is dependent on the potential for reflection of noise around the barrier and the frequency spectra of the noise. Buildings next to a roadway may shield receptors from traffic noise, and closely spaced buildings may provide about 5 dBA of reduction.¹⁰ Atmospheric conditions such as wind speeds, wind direction, humidity, and temperature gradients also affect noise propagation at greater distances. Building façades also provide a barrier to ambient exterior noise. The type of construction typically used for high-rise residential building may be expected to reduce exterior noise levels by a minimum of 25 dB with exterior doors and windows closed.¹¹

Noise Descriptors

Time variations in noise exposure are typically expressed in terms of a steady-state energy level (the equivalent noise level or “ L_{eq} ”) that represents the acoustical energy of a given measurement. L_{eq} is used to describe noise over a specified period of time, in terms of a single numerical value. The L_{eq} is the constant sound level that would contain the same acoustic energy as the varying sound level, during the same time period (i.e., the average noise exposure level for the given time period). Because community receptors are more sensitive to unwanted noise intrusion during the evening and at night, for planning purposes, an increment of 10 dBA is added to nighttime (10:00 p.m. to 7:00 a.m.) noise levels to form a 24-hour noise descriptor called the day-night noise level (L_{dn}). The maximum noise level (L_{max}) is the maximum instantaneous noise level measured during the measurement period of interest. The L_{eq} , L_{max} , L_{dn} , and the other statistical descriptors for noise that are used here are defined in terms of dBA using the A-weighted sound pressure level (also called sound level or noise level) scale.

EXISTING NOISE ENVIRONMENT

Environmental noise in the dense urban setting of the proposed project is primarily dependent on proximity to vehicle traffic and the mix of vehicle types. As is the case in most urban areas, ambient noise is predominantly a result of surface traffic (autos, trucks, and buses) and other transportation-related noise sources, including sirens from emergency vehicles and back-up beepers for truck deliveries and refuse collection. The project site is bounded by Post Street on the north, Gough Street on the east, Geary Boulevard on the south, and its west property line. Land uses surrounding the project site include residential, retail, commercial, office, cultural, hotel, and open space uses. Adjacent development attracts vehicular traffic that contributes to

¹⁰ California Department of Transportation, Division of Environmental Analysis, “Technical Noise Supplement,” November 2009, pp. 2-39 and 2-40. Available online at http://www.dot.ca.gov/hq/env/noise/pub/tens_complete.pdf. Accessed August 12, 2013.

¹¹ *Environmental Noise Assessment*, p. 6.

ambient noise levels in the area. In the immediate vicinity of the project site, traffic noise is generated along Geary Boulevard (approximately 2,800 vehicles during the PM peak hour) and Gough Street (approximately 1,800 vehicles per PM peak hour).¹² Near the project site, two Muni bus lines (the 38 Geary and 38 Geary Limited) operate on Geary Boulevard and two Muni bus lines (the 3 Jackson and 2 Clement) operate on Post Street.¹³ Heavy vehicles, such as diesel-powered buses and trucks, generally dominate traffic noise, with each heavy vehicle emitting the equivalent acoustical energy of ten or more typical passenger vehicles.¹⁴ The existing ambient noise environment at the project site is thus dominated by motor vehicle noise generated on Geary Boulevard, Gough Street, and Post Street. Traffic noise is also generated by vehicles as they access off-street parking from Geary Boulevard and Gough Street for the 1333 Gough Street building on the east end of the project site, from Geary Boulevard and Post Street for the 1400 Geary Boulevard building (The Sequoias) west of the project site, and from Post Street for the 1450 Post Street building north of the project site.

The *San Francisco General Plan (General Plan)* includes a map of background noise levels throughout the City, based on noise modeling done by the San Francisco Department of Public Health (DPH) of baseline traffic from the San Francisco County Transportation Authority travel demand model. The map of background noise levels shows the range of L_{dn} values that occurs along every street in San Francisco. Streets adjacent to the project site and throughout the area exceed 65 dBA (L_{dn}). The map shows that the Post Street roadway segment adjacent to the project site is within the 65 to 70 dBA (L_{dn}) noise contour and that the roadway segments of Gough Street and Geary Boulevard adjacent to the site are in excess of 70 dBA (L_{dn}).¹⁵

Although continuous traffic noise dominates the environment, short-term noises can be more distinctive with sounds like those from truck back-up beepers, trucks unloading and loading, car doors slamming, and engines revving during deliveries and pick-ups. These short-term noises can cause disturbance and annoyance, but they generally contribute very little to 24-hour noise levels due to their brief nature. The effects of traffic noise depend on time and context. For example, as discussed under “Fundamentals of Environmental Noise,” sustained noise from large

¹² LCW Consulting, *1333 Gough St/1481 Post St Transportation Impact Study*, Case No. 2005.0679E, July 29, 2014. A copy of this document is available for review at the San Francisco Planning Department, 1650 Mission Street, Suite 400, in Case File No. 2005.0679E.

¹³ Implementation of the SFMTA’s Transit Effectiveness Project may result in the elimination of the 3 Jackson route.

¹⁴ California Department of Transportation, Division of Environmental Analysis, “Technical Noise Supplement,” November 2009, p. 4-6. Available online at http://www.dot.ca.gov/hq/env/noise/pub/tens_complete.pdf. Accessed August 12, 2013.

¹⁵ *San Francisco General Plan*, Background Noise Levels, 2009. Available online at http://www.sf-planning.org/ftp/General_Plan/images/16.environmental/ENV_Map1_Background_Noise%20Levels.pdf. Accessed August 12, 2013.

traffic volumes can make conversation difficult or impossible, while short-term sounds, if they occur at night, can disturb sleep.

Existing ambient noise levels in the project area are also influenced by mechanical noise sources that continuously or routinely operate. Buildings on and adjacent to the project site include stationary sources of mechanical noise such as heating, ventilation, and air conditioning equipment. The existing 14-story residential building on the east end of the project site (1333 Gough Street) is mechanically ventilated with rooftop equipment about 138 feet above ground level.

Ambient Noise Measurements

An ambient noise survey was conducted by Brown-Buntin Associates for the proposed project on July 10, 2013.¹⁶ Ambient 24-hour and short-term noise measurements were collected to establish the existing noise conditions in the project vicinity. The day-night noise level (L_{dn} over a 24-hour period) was measured at three locations: at the 9th floor of the existing 1333 Gough Street building facing Geary Boulevard, at the 13th floor of the existing 1333 Gough Street building facing Post Street, and at the southwest corner of the project site along Geary Boulevard one floor level above street grade. Daytime short-term noise levels (L_{eq} and L_{max}) were measured over 15-minute intervals at nine locations in the project vicinity. **Figure 4.D.1: Noise Measurement Locations** illustrates the 24-hour and short-term noise measurement locations.

Table 4.D.2: 24-Hour Ambient Noise Levels in the Study Area presents the measured 24-hour ambient noise levels in terms of the hourly L_{eq} range and the L_{max} , as well as the calculated L_{dn} value. This table also identifies the noise level that is exceeded 90 percent of the time of each hour (L_{90} level). The L_{90} is generally considered to represent the residual (or background) noise level in the absence of identifiable or distinctive shorter-term high-level noise events from vehicles, aircraft, or other sources. The 24-hour ambient noise levels at Locations A to C were estimated to be in the range of 68.3 to 70.8 dBA (L_{dn}), which is typical for a dense urban environment. The measurements confirm the results of the noise modeling done by DPH for the Background Noise Levels Map, discussed above, with levels between 65 to 70 dBA (L_{dn}) along Post Street and 70 dBA (L_{dn}) or higher facing Geary Boulevard.

Daytime noise variations are captured with short-term (15-minute) noise measurements that were performed at nine street-level locations on or in the immediate vicinity of the project site (see **Figure 4.D.1**). These noise measurements included simultaneous observations of the dominant noise sources affecting the measurements (generally traffic and the voices of passers-by).

¹⁶ Brown-Buntin Associates, Inc., *Environmental Noise Assessment*, pp. 4-5.

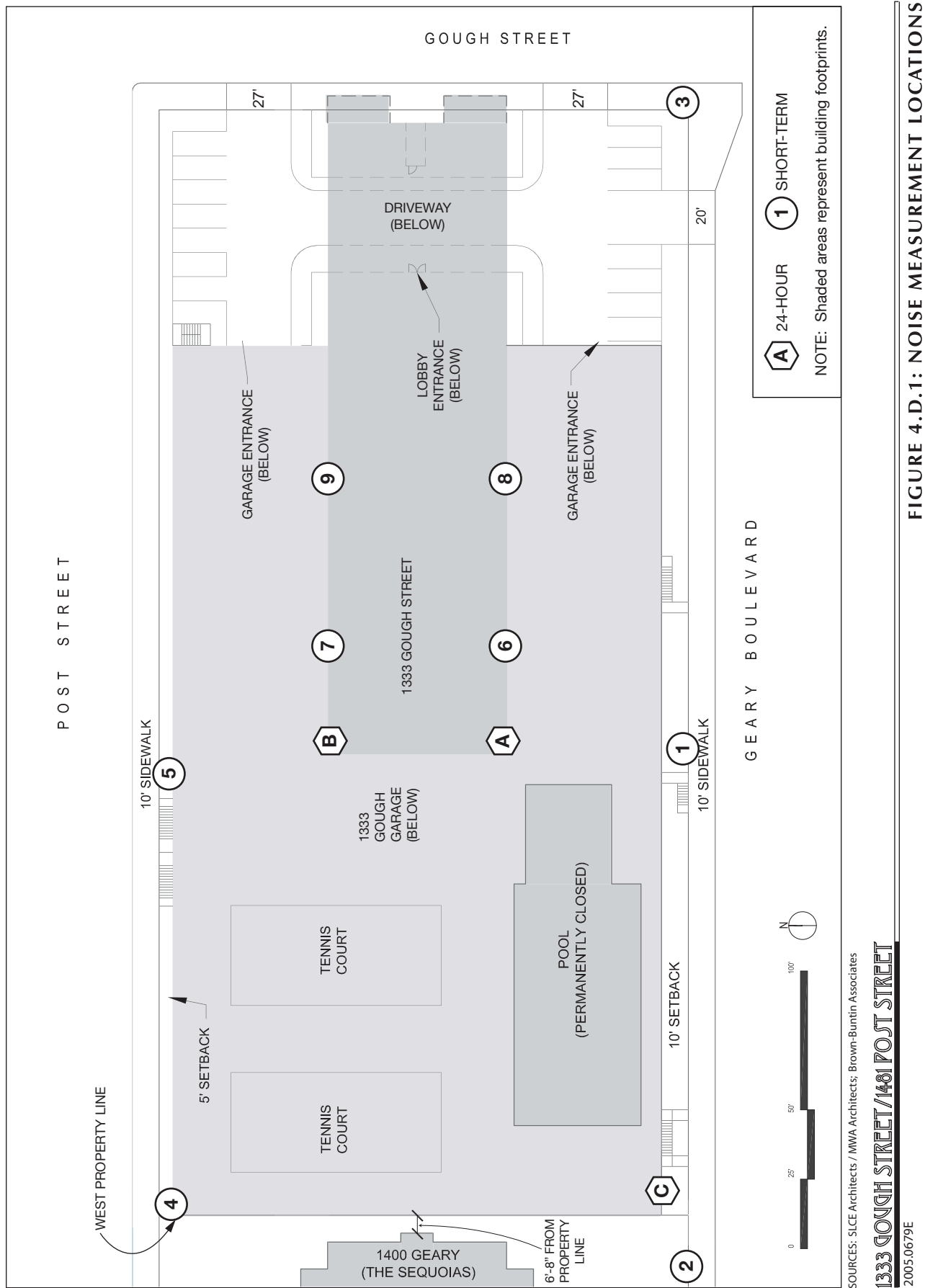


FIGURE 4.D.1: NOISE MEASUREMENT LOCATIONS

Table 4.D.2: 24-Hour Ambient Noise Levels in the Study Area

Noise Measurement Location ^a	24-Hour Noise Level	Range of Hourly Noise Levels		
	L_{dn} , dBA	L_{eq} , dBA	L_{max} , dBA	L_{90} , dBA
A: 1333 Gough Street, 9 th Floor (Geary Boulevard)	69.5	57.5 – 67.7	75.6 – 89.9	44.3 – 62.1
B: 1333 Gough Street, 13 th Floor (Post Street)	68.3	53.2 – 70.5	69.3 – 87.3	48.6 – 61.8
C: SW Corner of Project Site, 2 nd Floor (Geary Boulevard)	70.8	59.1 – 70.2	75.3 – 95.0	49.3 – 64.4

Notes:

dBA = A-weighted decibels; L_{dn} = day-night noise level; L_{eq} = equivalent noise level; L_{max} = maximum noise level; L_{90} = noise level that is exceeded 90 percent of the time during each hour. Measurements collected on July 10, 2013.

^a See **Figure 4.D.1**, p. 4.D.8, for noise measurement locations.

Source: Brown-Buntin Associates, Inc., 2013

Table 4.D.3: Short-Term Noise Levels in the Study Area lists the short-term noise measurement results. The background noise levels measured at the short-term sites were estimated to be in the range of 62 to 72.6 dBA (L_{eq}), with the highest levels approaching 85 dBA (L_{max}). Residual noise levels were estimated to range from 56.7 to 69.7 dBA (L_{90}), indicating a persistence of traffic noise from surface streets during daytime hours.

The two sets of measurements show how short-term noise fluctuates in a setting dominated by continuous traffic noise. Peak levels (L_{max}) of potentially distinctive short-term noises occur up to 95 dBA (L_{max}) during one 24-hour measurement at Location C (in **Table 4.D.2**) and at levels approaching 85 dBA (L_{max}) adjacent to surrounding streets in the daytime at locations 3 and 5 (in **Table 4.D.3**). Peak levels (L_{max}) that occurred during the nine short-term measurements were between 8 to 28 dBA higher than the comparable daytime noise levels that persist in the background 90 percent of the time (L_{90}), and the peak levels (L_{max}) were between 5 to 20 dBA higher than the L_{eq} shown in **Table 4.D.3**.

VIBRATION AND GROUNDBORNE NOISE

In contrast to airborne noise, groundborne vibration is less common, although the effects of energy transferred through the soils to building foundations can include perceptible movement of building floors or rumbling sounds or rattling windows. The rumbling sound caused by the vibration of room surfaces is called groundborne noise, which can occur as a result of the low-frequency components from a specific steady source of vibration, such as a rail line. Typically, groundborne vibration generated by man-made activities attenuates rapidly with distance from the source of the vibration.

Table 4.D.3: Short-Term Noise Levels in the Study Area

Location Number	Date and Time of Measurement		Noise Level		
	Date	Time	L _{eq} , dBA	L _{max} , dBA	L ₉₀ , dBA
1	7/10/13	8:45 AM	65.6	75.7	60.3
2	7/10/13	9:05 AM	68.2	78.4	61.9
3	7/10/13	9:27 AM	72.6	84.5	69.7
4	7/10/13	9:52 AM	65.6	82.2	56.8
5	7/10/13	10:24 AM	64.5	84.8	56.7
6	7/10/13	10:49 AM	65.8	71.1	63.3
7	7/10/13	11:20 AM	62.4	78.7	60.2
8	7/10/13	11:49 AM	65.0	76.4	60.5
9	7/10/13	12:17 PM	62.0	68.2	58.7

Notes:

L_{eq} = equivalent noise level; L_{max} = maximum noise level; L₉₀ = noise level that is exceeded 90 percent of the time during each hour. Short-term measurements are 15-minute duration.

^a See **Figure 4.D.1**, p. 4.D.8, for noise measurement locations.

Source: Brown-Buntin Associates, Inc., 2013

Vibration is an oscillatory motion through a solid medium in which the motion's amplitude can be described in terms of displacement, velocity, or acceleration. Several different methods are used to quantify vibration. The peak particle velocity (PPV) is defined as the maximum instantaneous peak of the vibration signal in inches per second. The PPV is most frequently used to describe physical vibration of the movement of buildings. The root mean square (RMS) amplitude is most frequently used to describe the effect of vibration that displaces the human body. The RMS amplitude is defined as the average of the squared amplitude of the signal. Decibel notation (VdB) is commonly used to measure RMS.¹⁷ With the exception of occupational exposure, vibration levels rarely affect human health. Instead, most people consider vibration to be an annoyance that can affect concentration or disturb sleep. Receptors sensitive to vibration include structures (especially older masonry structures), people (especially residents, the elderly, and sick), and vibration-sensitive equipment.

Typical sources of vibration at the project site are limited to heavy-duty trucks or buses that may pass adjacent to the site and encounter a discontinuity (pothole or bump) along Geary Boulevard, Gough Street, or Post Street. Equipment typically used for street work or maintenance (unrelated to the proposed project) may also occasionally and temporarily create perceptible vibration. There are no other known sources of groundborne vibration in the vicinity of the project site.

EXISTING SENSITIVE RECEPTORS

Noise-sensitive land uses or receptors are those where noise exposure would result in adverse effects (i.e., injury or annoyance) to individuals and uses where quiet is an essential element of their intended purpose. Residences are of primary concern because of the potential for increased

¹⁷ Vibration velocity level is reported in decibels relative to a level of 1×10^{-6} inches per second and is denoted as VdB.

and prolonged exposure of individuals to both interior and exterior noise. Other noise-sensitive land uses are hotels and motels, schools, preschools, libraries, places of worship, hospitals, senior care centers, nursing homes, retirement residences, and other places where low interior noise levels are essential to the use.

Land uses within and near the project site are described in detail in **Section 4.B, Land Use and Land Use Planning**, pp. 4.B.1-4.B.6, and are shown in **Figure 4.B.1: Land Uses in the Project Vicinity**, on p. 4.B.3.

The residents of 1333 Gough Street are noise-sensitive receptors on the project site. The nearest off-site noise-sensitive land use is the adjacent retirement community complex, The Sequoias, at 1400 Geary Boulevard, with assisted living and skilled nursing services on site. The complex includes the 25-story Sequoias residential tower, located about 70 feet west of the property line shared with the project site. The easternmost portion of the neighboring Sequoias property is occupied by a 3-story health center facility, built in 1997 and licensed for 50 skilled nursing beds, 18 units of assisted living, and 19 memory care beds. At its closest point, The Sequoias health center facility is about 6 feet, 8 inches west of the property line shared with the project site.

The nearest noise-sensitive land uses to the north and east of the project site are across Post Street and Gough Street and separated by the road right-of-way (48 feet, 9 inches) and sidewalks on each side (10 feet). They include Nihonmachi Terrace, a complex of two- and four-story residential buildings at 1490-1592 Post Street, between 70 and 300 feet northwest of the project site across Post Street; the 12-story Carlisle Senior Living Center at 1450 Post Street, about 70 feet north of the project site across Post Street; four two- and three-story residential buildings at 1400, 1402, 1406-1408, and 1410 Post Street, about 70 feet north of the project site across Post Street; and the Post International complex at 1388 Gough Street, about 70 feet east of the project site across Gough Street.

Other noise-sensitive residential and nursing care land uses within a 300-foot radius of the project site boundaries are at 1530 Post Street, 1550 Post Street, 1619 Sutter Street, 1550 Sutter Street,¹⁸ 1533 Sutter Street; 1531 Sutter Street,¹⁹ 1527 Sutter Street, 1521 Sutter, 1515 Sutter Street, 1407 Gough Street, 1409 Gough Street, 1550 Sutter Street, 1499 Sutter Street, 1483 Sutter Street (the Sutterfield), 1355 Post Street, and 1200 Gough Street. Places of worship within 300 feet include St. Mary's Cathedral across Geary Boulevard and the First Unitarian Universalist Church across Gough Street. Although there are no hotels, schools, or hospitals within a 300-foot radius of the project site boundaries, these land uses do exist in the larger project area.

¹⁸ Vintage Coventry is a licensed Residential/Respite Care Program with a 210-bed capacity.

¹⁹ Kimochi Home is a licensed Residential/Respite Care Program with a 20-bed capacity.

Similar to noise-sensitive receptors, vibration-sensitive land uses or receptors include residences, educational uses, places of worship, and hospitals because people in these uses can experience annoyance from groundborne vibration. Vibration-sensitive uses also include fragile buildings and underground facilities, in particular those that are considered historical, because groundborne vibration can result in structural damage. No known historic or potentially fragile structures are adjacent to the project site. The on-site residential building at 1333 Gough Street and the adjacent Sequoias retirement community complex at 1400 Geary Boulevard are modern structures with reinforced concrete and steel building materials that are not especially susceptible to vibration damage. Certain workplaces may also contain vibration-sensitive equipment (e.g., high-resolution lithography equipment, electron microscopes, or micro-electronics production equipment), although none of these vibration-sensitive facilities are near the project site. Typical office-based computing and communication equipment is not considered highly sensitive to vibration.

REGULATORY FRAMEWORK

FEDERAL

U.S. Environmental Protection Agency - Noise

The USEPA Office of Noise Abatement and Control was originally established to coordinate federal noise control activities, and implement the Federal Noise Control Act of 1972, which set programs and guidelines to identify and address the effects of noise on public health and welfare, and the environment. Although the primary responsibility of regulating noise was later transferred to state and local governments in 1982, the USEPA published early guidelines for community noise that are a foundation for current research, including that of WHO described under “Health Effects of Environmental Noise.” The USEPA found that to prevent hearing loss over the lifetime of a receptor, the yearly average L_{eq} should not exceed 70 dBA, and that to prevent interference and annoyance, the L_{dn} should not exceed 55 dBA in outdoor activity areas or 45 dBA indoors.²⁰ Guidelines established by the USEPA are as follows: sleep disturbance can occur at levels above 35 dBA; interference with human speech begins at about 60 dBA; and hearing damage can result from prolonged exposure to noise levels in excess of 85 to 90 dBA.²¹

²⁰ U.S. Environmental Protection Agency, *Information on Levels of Environmental Noise Requisite to Protect Public Health and Welfare with an Adequate Margin of Safety*, March 1974, p. 4. A copy of this document is available for review at the San Francisco Planning Department, 1650 Mission Street, Suite 400, as part of Case File No. 2005.0679E.

²¹ U.S. Environmental Protection Agency, *Information on Levels of Environmental Noise Requisite to Protect Public Health and Welfare with an Adequate Margin of Safety*, March 1974, Appendices C and D. A copy of this document is available for review at the San Francisco Planning Department, 1650 Mission Street, Suite 400, as part of Case File No. 2005.0679E.

Federal Transit Administration - Vibration

To address the human response to groundborne vibration and to establish whether vibration levels would be considered excessive, the Federal Transit Administration (FTA) has guidelines for maximum-acceptable vibration criteria for different types of land uses.²² These guidelines recommend vibration levels from 72 VdB to 80 VdB for residential uses and buildings where people normally sleep, and 75 VdB to 83 VdB for institutional land uses with primarily daytime operations (e.g., schools, churches, clinics, offices). The higher vibration levels in these ranges apply to infrequent events (fewer than 30 per day) and the lower levels apply to frequent vibration events (more than 70 per day). According to FTA guidelines, a vibration level of 65 VdB is the threshold of perceptibility for humans and 80 VdB is the level for a significant impact to occur.

STATE

Title 24 of the California Code of Regulations, Noise Insulation Standards

State regulations include standards that are intended to limit the extent of noise transmitted into habitable spaces of new multi-family residential units such as those uses proposed by the project (including hotels, motels, apartment houses, and dwellings other than detached single-family dwellings). These requirements are collectively known as the California Noise Insulation Standards and are found in Title 24 of the California Code of Regulations. For limiting noise transmitted between adjacent dwelling units, the noise insulation standards specify the extent to which walls, doors, and floor-ceiling assemblies must block or absorb sound. For limiting noise from exterior sources, the noise insulation standards set forth an interior standard of 45 dBA (L_{dn}) in any habitable room and, where such units are proposed in areas subject to exterior noise levels greater than 60 dBA (L_{dn}), a demonstration of how dwelling units have been designed to meet this interior standard is required. If the interior noise level depends upon windows being closed, the design for the structure must also include a heating, ventilation, and air conditioning (HVAC) system that will provide for adequate fresh air ventilation as specified by the building code. The City and County of San Francisco has adopted Title 24 of the California Code of Regulations, enforceable by the Department of Building Inspection (DBI).

California Department of Transportation - Vibration

To protect buildings from groundborne vibration, the California Department of Transportation (Caltrans) recommends a limit of 0.5 inch per second peak particle velocity (in/sec PPV) for modern commercial and new residential buildings and 0.25 in/sec PPV for older or historically

²² Federal Transit Administration, *Transit Noise and Vibration Impact Assessment*, May 2006, p. 8-3. Available online at www.fta.dot.gov/documents/FTA_Noise_and_Vibration_Manual.pdf. Accessed September 9, 2013.

significant buildings.²³ To avoid human annoyance, Caltrans recommends that vibration levels at sensitive land uses be limited to 0.04 in/sec PPV for transient vibration and 0.01 in/sec PPV for continuous vibration.

CITY

San Francisco General Plan

The *General Plan* Environmental Protection Element focuses on the effect that noise from ground-transportation noise sources has on the community and includes a land use compatibility chart for community noise. This chart, presented as **Table 4.D.4: San Francisco General Plan Land Use Compatibility Chart for Community Noise**, identifies a range of noise levels considered generally compatible or incompatible with various land uses and indicates when special noise reduction requirements should be considered or analyzed, such as providing sound insulation for affected properties. Residential and hotel uses are considered compatible in areas where the noise level is 60 dBA L_{dn} or less; schools, classrooms, libraries, churches, and hospitals are compatible in areas where the noise level is 65 dBA L_{dn} or less; and playgrounds, parks, offices, retail commercial uses, and noise-sensitive manufacturing and communication uses are considered compatible in areas where the noise level is 70 dBA L_{dn} or less.

The *General Plan* Housing Element (Part 1, pp. C.4-C.5) provides recommendations for identification of adequate sites to meet the City's housing needs. One of the implementing programs specifies that:

The Planning Department shall require the preparation of an analysis that includes a site survey to identify potential noise-generating uses within two blocks of the project site prior to completion of the environmental review for all residential projects located in areas exceeding 75 L_{dn} . The analysis shall include at least one 24-hour noise measurement (with maximum noise level readings taken at least every 15 minutes). The analysis shall demonstrate with reasonable certainty that Title 24 standards, where applicable, can be met. If there are particular circumstances about the proposed project site that appear to warrant heightened concern about noise levels in the vicinity, the Department may require the completion of a detailed noise assessment prior to the first project approval action, in order to demonstrate that acceptable interior noise levels consistent with those in the Title 24 standards can be attained.

²³ Caltrans, *Transportation- and Construction-Induced Vibration Guidance Manual*, June 2004, p. 27. Available online at www.dot.ca.gov/hq/env/noise/pub/vibrationmanFINAL.pdf. Accessed September 20, 2013.

Table 4.D.4: San Francisco General Plan Land Use Compatibility Chart for Community Noise

Land Use Category	Sound Levels and Land Use Consequences (L_{dn} Values in dB)						
	55	60	65	70	75	80	85
Residential – All Dwellings, Group Quarters							
Transient lodging - Motels, Hotels							
School Classrooms, Libraries, Churches, Hospitals, Nursing Homes, etc.							
Auditoriums, Concert Halls, Amphitheaters, Music Shells							
Sports Arenas, Outdoor Spectator Sports							
Playgrounds, Parks							
Golf Courses, Riding Stables, Water-Based Recreation Areas, Cemeteries							
Office Buildings – Personal, Business, and Professional Services							
Commercial – Wholesale and Some Retail, Industrial/Manufacturing, Transportation, Communication, and Utilities							
Manufacturing – Noise-Sensitive Communications – Noise-Sensitive							

Satisfactory, with no special noise insulation requirements.

New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design.

New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.

New construction or development should generally not be undertaken.

Source: *San Francisco General Plan*, adopted on June 27, 1996. Environmental Protection Element, available online at http://www.sf-planning.org/ftp/General_Plan/I6_Environmental_Protection.htm

The results of the noise survey prepared for Planning Department review of this project confirm that noise levels are between 65 to 70 dBA (L_{dn}) along Post Street and 70 dBA (L_{dn}) or higher facing Geary Boulevard. Three 24-hour noise measurements on the site indicate that existing noise levels are in the range of 68.3 to 70.8 dBA (L_{dn}), as shown in **Table 4.D.2**, p. 4.D.9. The 24-hour measurements and short-term measurements at nine locations in the project vicinity capture the noise variations from all existing sources, including ambient effects of traffic, mechanical equipment, aircraft, and human behavior. The data indicates that the future residents on the project site would not be exposed to levels exceeding 75 L_{dn} .

San Francisco Noise Ordinance

The San Francisco Noise Ordinance (Noise Ordinance) regulates both construction noise and stationary-source noise within the City, including noise from transportation, construction, mechanical equipment, entertainment, and human or animal behavior. Found in Article 29, “Regulation of Noise,” of the San Francisco Police Code, the Noise Ordinance addresses noise from construction equipment, nighttime construction work, and noise from stationary mechanical equipment and waste-processing activities.²⁴ The basis and purpose of the Noise Ordinance are stated in § 2900(a) to (c), as follows:

Sec. 2900, Declaration of Policy

(a) Building on decades of scientific research, the World Health Organization and the U.S. Environmental Protection Agency have determined that persistent exposure to elevated levels of community noise is responsible for public health problems including, but not limited to: compromised speech, persistent annoyance, sleep disturbance, physiological and psychological stress, heart disease, high blood pressure, colitis, ulcers, depression, and feelings of helplessness.

(b) The General Plan for San Francisco identifies noise as a serious environmental pollutant that must be managed and mitigated through the planning and development process. But given our dense urban environment, San Francisco has a significant challenge in protecting public health from the adverse effects of community noise arising from diverse sources such as transportation, construction, mechanical equipment, entertainment, and human and animal behavior.

(c) In order to protect public health, it is hereby declared to be the policy of San Francisco to prohibit unwanted, excessive, and avoidable noise. It shall be the policy of San Francisco to maintain noise levels in areas with existing healthful and acceptable levels of noise and to reduce noise levels, through all practicable means, in those areas of San Francisco where noise levels are above acceptable levels as defined by the World Health Organization’s Guidelines on Community Noise.

²⁴ City and County of San Francisco, 2012, Article 29 of the San Francisco Police Code, Regulation of Noise. Available online at <http://www.sfdph.org/dph/EH/Noise/default.asp>. Accessed March 11, 2013.

Sections 2904, 2907, 2908, 2909, and 2910 of the Noise Ordinance are all applicable to the proposed project and are described below.

Section 2904, Waste Disposal Services

This section of the Noise Ordinance limits the noise level produced by waste disposal activities on garbage trucks to 75 dBA when measured at a distance of 50 feet from the equipment. The maximum noise level does not apply to the noise associated with crushing, compacting, dropping, or moving garbage on the truck, but only to the truck's mechanical processing system.

Section 2907, Construction Equipment, and Section 2908, Construction Work at Night

These sections of the Noise Ordinance establish noise levels for construction equipment. § 2907(a) limits noise levels from construction equipment as specified under the ordinance to 80 dBA L_{eq} at 100 feet (or other equivalent sound levels at other distances) from construction equipment between 7 a.m. and 8 p.m. According to § 2908, construction work at night (from 8 p.m. to 7 a.m.) may not exceed the ambient level by 5 dBA at the nearest property line or plane between properties unless a special permit is granted before such work by the Director of Public Works or the Director of Building Inspection. If night work is in the general public interest, under § 2908, the Director of Public Works or the Director of Building Inspection shall prescribe such conditions, working times, types of construction equipment to be used, and permissible noise emissions. The provisions of § 2907(a) do not apply to impact tools and equipment if the impact tools and equipment have intake and exhaust mufflers as recommended by the manufacturers and are approved by the Director of Public Works or the Director of Building Inspection as accomplishing maximum noise attenuation. The noise exemption also does not apply to pavement breakers and jackhammers, which also must be equipped with acoustically attenuating shields or shrouds as recommended by the manufacturers and approved by the Director of Public Works or the Director of Building Inspection as accomplishing maximum noise attenuation.

Section 2909, Noise Limits

This section of the Noise Ordinance regulates noise from mechanical equipment and other similar sources. (As stated in the ordinance, "No person shall produce or allow to be produced by any machine, or device, music or entertainment, or any combination of same . . .") This would include all equipment – e.g., electrical equipment (transformers, emergency generators) as well as mechanical equipment – that is installed on commercial/industrial and residential properties. Mechanical equipment operating on commercial or industrial property must not produce a noise level more than 8 dBA above the ambient noise level at the property line or plane between

properties. Equipment operating on residential property must not produce a noise level more than 5 dBA above the ambient noise level at the property boundary or property plane.

Section 2909 also states in subsection (d) that no fixed (permanent) noise source (as defined by the Noise Ordinance) may cause the noise level inside any sleeping or living room in a dwelling unit on residential property to exceed 45 dBA between 10 p.m. and 7 a.m. or 55 dBA between 7 a.m. and 10 p.m. when windows are open, except where building ventilation is achieved through mechanical systems that allow windows to remain closed.

Section 2910, Variances

This section of the Noise Ordinance empowers the Directors of Public Health, Public Works, and Building Inspection and the Entertainment Commission, and the Chief of Police to grant variances to noise regulations, over which they have jurisdiction pursuant to § 2916. All administrative decisions granting or denying variances may be appealed to the San Francisco Board of Appeals.

IMPACTS AND MITIGATION MEASURES

SIGNIFICANCE THRESHOLDS

The thresholds for determining the significance of impacts in this analysis are consistent with the environmental checklist in Appendix G of the State *CEQA Guidelines*, which has been adopted and modified by the San Francisco Planning Department. For the purpose of this analysis, the following applicable thresholds were used to determine whether implementing the project would result in a significant impact on noise and vibration. Implementation of the proposed project would have a significant noise or vibration impact if the project were to:

- Expose people to or generate noise levels in excess of standards established in the San Francisco General Plan or Noise Ordinance (Article 29 of the Police Code);
- Expose people to or generate excessive groundborne vibration or groundborne noise levels;
- Result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project;
- Result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project; or
- Be substantially affected by existing noise levels.

PROJECT FEATURES

The proposed project entails the demolition of the existing parking structure (together with the common open space terrace, tennis courts, and pool building that sit atop the parking structure)

and the construction of a new, approximately 36-story, 398-foot-tall (416 feet tall including an 18-foot-tall mechanical penthouse) high-rise tower (the proposed 1481 Post Street building) with up to 262 residential units, 2,230 gsf of ground-floor retail, an 8,000-gsf fitness center, a 180,000-gsf four-level underground parking garage, associated building services, and open space. The proposed project also includes modifications to the existing 214,400-gsf 1333 Gough Street building on the eastern portion of the project site. Project construction would take about 27 months and would take place in overlapping phases. Demolition would take about 1.75 months. Excavation and shoring would take about 2.5 months. Foundation work and below-grade construction would take about 4.5 months. Base building construction would take about 11 months. Exterior finishing would take about 4 months. Interior finishing would take about 12.5 months. Project construction activities would not include pile driving. Nighttime construction between 8 p.m. and 7 a.m. is not proposed.

Implementation of the proposed project would introduce new sensitive receptors (in the residential dwelling units) on the 3rd floor (at approximately 40 feet above grade) through the 36th floor of the proposed 1481 Post Street building. All new residential units would include air conditioning or mechanical ventilation systems, which allow exterior windows and doors to remain closed and provide protection from exterior noise. The proposed project would also result in the siting of new stationary sources of noise: a diesel-fueled back-up emergency generator and natural-gas-fired mechanical ventilation systems or boilers. The emergency generator and other mechanical systems would be located in the mechanical rooms on the north and south portions of the roof of the new 36-story, 398-foot-tall building (see **Figure 2.9: Proposed Mechanical and Penthouse Plan**, in **Chapter 2, Project Description**, p. 2.16). The boiler room, chiller room, and other mechanical space would be located in a mechanical room at Basement Level 1 (see **Figure 2.13: Proposed Basement Level 1 Parking Plan**, p. 2.25). Equipment details are still in development, and the final design would ultimately be presented in plans to be prepared in the future specifying the specific locations and performance requirements.

Development of the proposed project would introduce additional vehicular traffic in the project vicinity. Access to off-street parking for the 1481 Post Street portion of the project site would be constructed along Post Street (a new one-way entry and new exit curb cuts). Access to off-street parking for the 1333 Gough Street portion of the project site would also be constructed along Post Street (one new two-way entry and exit curb cut) and Gough Street (existing curb cut). See **Figure 2.3: Proposed Ground Floor Plan** on p. 2.10. The two existing curb cuts at the southeast corner of the project site along Gough Street and along Geary Boulevard would be eliminated. Small delivery and service vehicles would use the Post Street entry curb cut. Larger delivery and service vehicles would access the proposed off-street loading area from a one-way curb cut entrance on Geary Boulevard. Delivery and service vehicles would exit the project site

from Post Street. Vehicular ingress and egress via Post Street would be a new source of traffic noise.

The proposed project includes three variants that are described in **Chapter 2, Project Description**, on pp. 2.30-2.34. The variants present optional schemes for sidewalk widening and for the number and width of curb cuts providing vehicular access to the project site. In all other respects, the variants would be the same as the proposed project. No separate analysis of the project variants is necessary under the topic of noise.

APPROACH TO ANALYSIS

This analysis identifies potential noise impacts associated with future development that could result from the proposed project. Operational noise issues evaluated in this section include: (1) noise generated by the proposed project created by mobile sources (e.g., motor vehicles) and new fixed, stationary sources (e.g., building mechanical systems, standby power generator, trash removal, ventilation equipment, etc.); and (2) compatibility of the proposed project with noise insulation standards in Title 24 of the California Code of Regulations, mechanical equipment and other noise limitation requirements in the Noise Ordinance, including § 2909(d), and performance standards for noise compatibility in the *San Francisco General Plan Land Use Compatibility Guidelines*. Permanent increases in ambient environmental noise levels of less than 3 dBA are typically considered to be less than significant, except in circumstances in which the resulting noise environment would be incompatible with existing land uses. Outside of the controlled conditions of an acoustics laboratory, changes in environmental noise are difficult to perceive. For people in areas affected by existing ambient noise, the average healthy ear experiences a change of 3 dBA as “barely perceptible,” while a 5-dBA change is readily noticeable.²⁵

Construction noise is discussed in relation to § 2907 of the San Francisco Noise Ordinance, which limits noise levels from construction equipment to 80 dBA L_{eq} at 100 feet between 7 a.m. and 8 p.m. No nighttime construction is proposed.

Groundborne vibration impacts associated with the proposed project are described using a general assessment methodology established in the FTA Transit Noise and Vibration Guidelines. A general assessment uses a reference level for vibration from typical construction equipment with standardized propagation curves to predict vibration levels at a given distance. If the general assessment reveals project-related groundborne vibration levels greater than 72 VdB at residential uses, it would indicate that additional study is needed or that site-specific measures are necessary

²⁵ California Department of Transportation, Division of Environmental Analysis, “Technical Noise Supplement,” November 2009, pp. 2-48 and 2-49. Available online at http://www.dot.ca.gov/hq/env/noise/pub/tens_complete.pdf. Accessed August 12, 2013.

to reduce or avoid the impact. Human annoyance due to any infrequent event would be expected to occur with vibration levels over 80 VdB.

The analysis of noise impacts on sensitive receptors under CEQA in this EIR includes and assumes the presence of members of the population who may be more sensitive to noise impacts due to age (the elderly or the young) or health; surrounding land uses include residences and care facilities where vulnerable groups may reside. Thus, the analysis of noise in this EIR accounts for senior residents of The Sequoias and nearby retirement communities and residential care facilities, as well as children and seniors residing in other nearby residences. However, the decision-makers may consider special concerns of seniors, children, the infirm, and other sensitive populations related to construction of the proposed project independent of the environmental review process under CEQA, as part of the decision to approve, modify, or disapprove the proposed project.

IMPACT EVALUATION

Construction

Impact NO-1: Construction of the proposed project would result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project. (*Less than Significant with Mitigation*)

Construction activities associated with the proposed project are anticipated to begin in fall 2015 and continue to the winter 2017. Demolition, excavation, and construction activities for the proposed mixed-use building would temporarily increase ambient noise levels. Construction activities would require the use of heavy trucks, excavating and grading equipment, material loaders, cranes, concrete breakers, and other mobile and stationary construction equipment, all of which produce noise as part of their routine use. Construction activities are characterized by variations in the power expended by equipment, with resulting variation in noise levels with time. Construction noise levels would vary greatly but would be limited to the duration of the various overlapping construction phases, estimated to last a total of approximately 27 months.²⁶

The magnitude of the construction noise levels would fluctuate at any given noise-sensitive receptor depending on the construction phase, the type of construction activity, the nature of the sound levels generated by the various pieces of construction equipment in use, the distance

²⁶ The anticipated start of construction presented here is based on the project sponsor's best estimate at this time and may change. The construction phasing and duration timeframes are based on the best estimates of the sponsor's construction consultant, Webcor, based on Webcor's experience with similar projects. See Webcor, memo from Ruben Diaz to Eric Grossberg and Linda Corso, 1481 Post Street Project - Summary of Construction Phases and Duration, January 21, 2013. This document is available for review in Case File No. 2005.0679E at the San Francisco Planning Department, 1650 Mission Street, Suite 400.

between the noise source and the noise-sensitive receptor, and the presence or absence of noise barriers between the noise source and the noise-sensitive receptor. Although the duration of construction noise is limited, the increased noise levels could be considered an annoyance by some receptors. The greatest potential for annoyance is generally limited to the noisiest phases of construction such as demolition, excavation, and foundation work, which would last approximately nine to ten months. Above-ground exterior structural and façade work would be completed over the ensuing 11 months. Interior improvements and finishing, which would involve fewer large pieces of heavy-duty construction equipment, would occur during the last half of construction, overlapping somewhat with the installation of the façade. Once the façade is in place, noise from interior finishing work would largely be contained within the building envelope and sources within the building enclosure would not result in notable exterior noise.

Typical construction equipment (without noise controls or features such as mufflers, silencers, shields, shrouds, ducts and engine enclosures) generates noise ranging from about 70 to 92 dBA at a distance of 100 feet from the source (see **Table 4.D.5: Typical Noise Levels of Construction Equipment**). Pile driving, which is the most disruptive activity in terms of construction noise, would not be part of the proposed project, as the proposed building would be supported on a mat foundation. Noise-generating construction activities typically include the use of heavy construction equipment for demolition, earthmoving activities, and materials handling; stationary equipment for on-site power generation; and impact tools and other equipment for demolition, site preparation, and shoring activities. During the proposed project demolition phase, the impact hammer (hydraulic concrete breaker) would be the loudest equipment, and during the excavation and shoring phase, the drill rig and excavators would create the highest noise levels.

As shown in **Table 4.D.5**, noise levels generated by heavy construction equipment and stationary equipment at a distance of 100 feet from the activity would range up to 82 dBA for equipment without additional controls, while noise levels from impact tools and other tools used for demolition, site preparation, and shoring activities, such as concrete breaking and drilling, would generate noise levels no greater than 84 dBA at a distance of 100 feet from the activity.

Construction noise is regulated by the City's Noise Ordinance, including § 2907(a), which specifies that noise levels from individual pieces of powered construction equipment, other than impact tools and equipment, shall not exceed 80 dBA at a distance of 100 feet from the source between 7 a.m. and 8 p.m. **Table 4.D.5** shows that without additional controls, daytime use of standard construction equipment may cause noise levels in excess of this standard at locations on and adjacent to the project site where there are sensitive receptors. Nighttime construction is not proposed. Based on the noise levels shown in Table 4.D.5, noise during demolition, excavation, and exterior building construction would exceed the Noise Ordinance standards, resulting in a significant impact. Table 4.D.5 shows that equipment to be used for the proposed project would

require additional controls to comply with the limit of 80 dBA at a distance of 100 feet set forth in the Noise Ordinance.

Table 4.D.5: Typical Noise Levels of Construction Equipment

Equipment Type	Noise Level at 50 Feet, ^a (dBA, L _{max})	Noise Level at 100 Feet, ^{a, b} (dBA L _{max})	Additional Noise Controls of 3 dBA Required?
Air Compressor	81	75	No
Backhoe	80	74	No
Concrete Pump	82	76	No
Crane (Derrick)	88	82	Yes
Crane (Mobile)	83	77	No
Dozer; Excavator	85	79	No
Loader; Front-End Loader	85	79	No
Generator	81	75	No
Jackhammer ^b	88	82	No ^b
Impact Hammer; Hydraulic Breaker ^b	90	84	No ^b
Pneumatic Tools	85	79	No
Pump	76	70	No
Roller	74	68	No
Soil Mix Drill Rig	80	74	No
Welder; Torch	73	67	No
Truck (Flat Bed, Dump, Concrete Mixer)	82 to 88	82	Yes

Notes:

L_{max} = maximum noise level.

^a. Typical L_{max} levels do not reflect shielding or usage factors that account for the percent per hour equipment is in use. Levels can be reduced by selecting quieter procedures or machines and implementing noise-control features that do not require major redesign or extreme cost (e.g., improved mufflers, equipment redesign, use of silencers, shields, shrouds, ducts, and engine enclosures).

^b. Construction noise at a distance of 100 feet from individual pieces of powered construction equipment, other than impact tools and equipment (jackhammer, impact hammer), are not to exceed 80 dBA per § 2907 and § 2908 of the City's Noise Ordinance between 7 a.m. and 8 p.m.

^c. Pile driving is not expected to be used during construction of the proposed project.

Source: Federal Transit Administration, *Transit Noise and Vibration Impact Assessment*, May 2006. p. 12-6.

Federal Highway Administration, *Roadway Construction Noise Model, User's Guide*, January 2006. p. 3.

Average noise levels at the nearest noise-sensitive residential use would vary by construction phase, depending on the type of equipment used and the proximity of construction activity to the noise-sensitive receptors. The loudest construction activities, such as those associated with the demolition, excavation, and below-grade basement construction phases, would occur over the first nine to ten months of the 27-month construction period, after which lower noise levels would be experienced by the affected sensitive receptors.

To assess the potential short-term noise impacts from specific construction phases, sensitive receptors and their relative levels of existing noise exposure are tabulated with their minimum distances to project-related construction. Project construction noise levels are modeled using the Transit Noise and Vibration Impact Assessment methodology,²⁷ with supporting data from the

²⁷ Federal Transit Administration, *Transit Noise and Vibration Impact Assessment*, May 2006. p.12-6.

Roadway Construction Noise Model.²⁸ The maximum modeled short-term noise levels at the locations of sensitive receptors are shown in **Table 4.D.6: Modeled Composite Noise Levels during Construction**.

Table 4.D.6: Modeled Composite Noise Levels during Construction

Sensitive Receptor	Existing Noise Level (dBA, Leq)	Distance to Project Construction (feet)	Modeled Construction Noise Level (dBA, Leq)	Exceeds Ambient (dBA)
On-site Residential (1333 Gough St.)	70	6.67	101	+31
Residential, Health Center (1400 Geary Blvd., The Sequoias)	70	6.67	101	+31
Residential, Senior Care, Respite Care (1400-1500 block Post St.)	65	50	86	+21
Residential (1388 Gough St.)	70	70	84	+14

Notes:

L_{eq} = equivalent noise level; L_{max} = maximum noise level.

^a. Modeled construction noise levels do not reflect shielding. Levels can be reduced by selecting quieter procedures or machines and implementing noise-control features that do not require major redesign or extreme cost (e.g., improved mufflers, equipment redesign, use of silencers, shields, shrouds, ducts, and engine enclosures).

Source: Aspen Environmental Group, 2014

Of the sensitive receptors listed on pp. 4.D.10-4.D.12, the greatest impacts would be experienced by the residences in the western part of the building on the eastern portion of the project site at 1333 Gough Street and at the health center facility at 1400 Geary Boulevard (The Sequoias), immediately adjacent to the west property line. The Sequoias's health center facility is in a building that is approximately 6 feet, 8 inches from the west property line of the project site at its closest point, and 16 feet, 8 inches from the westernmost aboveground edge of the proposed building at its closest point. Sensitive receptors located at 1510, 1490, 1410, 1406-1408, 1402, and 1400 Post Street, and at 1388 Gough Street are separated from the project site by the width of the adjacent streets (48 feet, 9 inches) plus sidewalks (10 feet).

Based on the noise levels shown in **Tables 4.D.5** and **4.D.6**, ambient noise levels at the exterior of the nearest sensitive receptors would increase by up to 31 dBA as a result of some construction activities. For sensitive receptors within 100 to 200 feet of the site, construction noise would be greater than existing ambient noise levels presented in **Table 4.D.2** and **Table 4.D.3** on p. 4.D.9 and p. 4.D.10, respectively. During demolition, excavation and shoring, and foundation construction, the modeled noise levels would be shielded partially by surrounding building façades (including 1333 Gough Street) and by the eventual excavated pit walls as construction work progresses. On-site residences and the skilled nursing beds within the adjacent health center facility at The Sequoias are assumed to be within building envelopes that provide an

²⁸ Federal Highway Administration, *Roadway Construction Noise Model, User's Guide*, January 2006. p.3.

exterior-to-interior noise level reduction of a minimum of 25 dBA attributable to the existing concrete façades. Interior maximum noise levels may range up to 76 dBA in the rooms of on-site residences and The Sequoias nearest to construction activities. Although these levels would only occur during daytime hours, construction would exceed the noise levels recommended for residences and for nursing facilities where vulnerable groups may be less able to cope with noise exposure. The effects of daytime construction noise experienced at the eastern end of The Sequoias and residences at the western end of 1333 Gough Street may include sleep disturbance, annoyance, and communication interference, including interference with warning signals interior to the nursing facility. As discussed in **Chapter 1, Introduction**, p. 1.8, comments on the NOP/IS state that construction noise could require temporary relocation of patients within the health center facility located at the eastern end of The Sequoias complex nearest to the construction site of the proposed 1481 Post Street building.

The discussion of the existing noise environment (on pp. 4.D.5-4.D.7) demonstrates that the off-site and on-site noise-sensitive receptors are already in an area with elevated ambient noise levels. Construction of the proposed project would temporarily and intermittently increase ambient noise levels during the 27-month construction period. As shown in **Table 4.D.5**, p. 4.D.23, individual equipment to be used for project construction would not comply with the limit for construction noise in the San Francisco Noise Ordinance,²⁹ and therefore would result in a significant impact without a mitigation measure to include additional noise controls. Because the nearest noise-sensitive receptors would be exposed to construction noise levels substantially in excess of ambient noise levels, primarily due to their proximity to construction activities, as shown in **Table 4.D.6**, p. 4.D.24, construction would cause a significant noise impact.

The conclusion for Impact NO-1 is based on two significance criteria: the project must meet the applicable noise standards and also the project must avoid creating a substantial noise increase. Additional noise controls would be required for construction to comply with all applicable provisions in the Noise Ordinance. Along with implementing feasible noise control techniques, implementation of **Mitigation Measure M-NO-1, Construction Noise Control Measures**, would require designating a Noise Disturbance Coordinator (on-site construction complaint and enforcement manager) and establishing a protocol to respond to and track complaints pertaining to construction noise; this would provide a way to establish a clear understanding of the extent or duration of the construction noise and avoid unnecessary disruptions of noise-sensitive receptors. With these measures, a substantial noise increase would be avoided. Implementation of **Mitigation Measure M-NO-1: Construction Noise Control Measures**, described below, would reduce construction noise impacts to a less-than-significant level.

²⁹ San Francisco Police Code, Article 29: Regulation of Noise; § 2907, Construction Equipment.

Mitigation Measure M-NO-1: Construction Noise Control Measures

The following practices shall be incorporated into the construction contract agreement documents to be implemented by the construction contractor:

- Provide best available noise control techniques for equipment and trucks, such as providing acoustic enclosures and mufflers for stationary equipment, shroud or shield impact tools, and installing barriers around particularly noisy activities at the construction sites so that the line of sight between the construction activities and nearby sensitive receptor locations is blocked to the maximum feasible extent. The placement of barriers or acoustic blankets shall be reviewed and approved by the Director of Public Works or the Director of Building Inspection prior to issuance of permits for construction activities.
- Install temporary noise barriers along the boundaries of the project site to shield potential sensitive receptors and reduce noise levels.
- Locate stationary equipment, stockpile and staging areas, and noise sources (such as compressors) as far as practicable from sensitive receptors in the buildings at 1333 Gough Street and at 1400 Geary Boulevard (The Sequoias). The best available noise control techniques to muffle such noise sources and construct barriers around such sources and/or the construction site shall be designed to reduce construction noise by at least 5 dBA. Examples of suitable materials for solid noise barriers to enclose sources include plywood (e.g., 1-inch thick), steel (e.g., 16-gauge), concrete, or heavy vinyl noise curtain material (e.g., SoundSeal BBC-13-2" or equivalent). To further reduce noise, the contractor shall locate stationary equipment in pit areas or excavated areas, if feasible.
- Where use of pneumatic tools, such as impact tools (e.g., jack hammers and pavement breakers), is unavoidable, a noise source screen such as a barrier around the activity using the tools, an external noise jacket, or an exhaust muffler on the compressed air exhaust shall be used and shall be designed to reduce noise levels from the source by 10 dBA.
- Use construction equipment with lower noise emission ratings whenever possible, particularly for air compressors.
- Provide sound-control devices on equipment no less effective than those provided by the manufacturer.
- Prohibit unnecessary idling of internal combustion engines.
- Require applicable construction-related vehicles and equipment to use designated truck routes to access the project sites.
- Prior to the issuance of the building permit, along with the submission of construction documents, the project sponsor shall designate a Noise Disturbance Coordinator (on-site construction complaint and enforcement manager) and submit to the Planning Department and Department of Building Inspection (DBI) a protocol to respond to and track complaints pertaining to construction noise. This shall include (1) a procedure and phone numbers for the Noise Disturbance Coordinator to notify DBI, the Department of Public Health, and the Police Department (during regular construction hours and off-hours); (2) a sign conspicuously posted on-site describing noise complaint procedures and a

complaint hotline number that shall be answered at all times during construction; (3) identification of the Noise Disturbance Coordinator for the project (name, phone number, email address); and (4) notification of property owners and occupants within 300 feet of the project construction area at least 14 days in advance of extreme noise-generating activities (activities expected to generate levels of 90 dBA or greater) about the estimated duration of the activity.

Achieving noise controls of 3 dBA is required for cranes and trucks on site to comply with the limit of 80 dBA at 100 feet set forth in the Noise Ordinance, as shown in **Table 4.D.5**, p. 4.D.23. Implementing the feasible noise controls specified in **Mitigation Measure M-NO-1** would provide quantifiable reductions of construction noise levels, by generally lowering construction noise by 5 to 10 dBA, depending on effectiveness. According to suggested “rules of thumb” in the Roadway Construction Noise Model, the following best practices may be used for estimating simplified shielding factors:³⁰

- If a noise barrier or other obstruction (like a dirt mound) just barely breaks the line-of-sight between the noise source and the receptor, the estimated shielding should be 3 dBA;
- If the noise source is completely enclosed or completely shielded with a solid barrier located close to the source, the estimated shielding should be 8 dBA, except if the enclosure and/or barrier has some gaps, the estimated shielding should be reduced to 5 dBA;
- If the noise source is completely enclosed and completely shielded with a solid barrier located close to the source, the estimated shielding should be 10 dBA;
- If a building stands between the noise source and receptor and completely shields the noise source, the estimated shielding should be 15 dBA; and
- If a noise source is enclosed or shielded with heavy vinyl noise curtain material (e.g., SoundSeal BBC-13-2" or equivalent), the estimated shielding should be 5 dBA.

With implementation of **Mitigation Measure M-NO-1**, the proposed project would achieve quantifiable noise level reductions by implementing feasible construction noise control measures to comply with the Noise Ordinance and therefore avoid creating a substantial noise increase. This would result in a less-than-significant impact with respect to the increase in ambient noise levels due to construction.

³⁰ Federal Highway Administration, *Roadway Construction Noise Model, User's Guide*, January 2006. p. A-1.

Impact NO-2: Construction of the proposed project would result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels. (*Less than Significant with Mitigation*)

Proposed project demolition, excavation, and building construction activities would require the use of heavy trucks, excavating and grading equipment, and material loaders. Such equipment would temporarily generate groundborne vibration in the project vicinity that could be considered an annoyance by occupants of adjacent properties, especially residential and nursing care uses adjacent to the site.

On-site demolition, excavation, and construction activities would result in varying degrees of temporary groundborne vibration, with the highest levels expected in the first nine to ten months of construction during demolition, excavation and shoring, and below-grade construction for the four basement levels. The proposed project would not require the use of driven or drilled piles to support the building foundation, which is typically the construction activity with the greatest potential to create excessive groundborne vibration levels. According to the FTA, construction-related vibration over 80 VdB would be a level where a significant vibration impact could be considered to occur due to human annoyance.

Heavy construction equipment (e.g., large bulldozers and loaded trucks) frequently generates between 86 and 87 VdB at 25 feet.³¹ On-site and adjacent sensitive receptors within the nearest buildings (residences at 1333 Gough Street and The Sequoias at 1400 Geary Boulevard) would experience peak levels of 99 VdB during those instances when heavy construction equipment moves adjacent to the façades of the existing buildings (within about 10 feet). Equipment used at distances greater than 45 feet from existing structures would cause vibration levels below 80 VdB. Construction-related truck trips would also temporarily generate groundborne vibration in the project vicinity throughout the 27-month construction period. Perceptible vibration from construction-related truck trips would increase along the routes used to access the site, notably along Post Street. However, vibration from on-road mobile sources over rough surfaces tends to occur for only brief periods, when a vehicle passes, and would not lead to excessive vibration levels.

Table 4.D.7: Modeled Vibration Levels during Demolition and Below-Grade Work shows the predicted maximum ground vibration levels for the nearest receptors. Although groundborne vibration levels caused by construction activities could be detected within the nearest buildings (1333 Gough Street and The Sequoias at 1400 Geary Boulevard), groundborne vibration levels would be below normal thresholds of annoyance for all activities for off-site receptors. Construction vibration would only occur during daytime hours, but vibration levels from demolition, excavation and shoring, and other below-grade construction activities within 45 feet

³¹ Brown-Buntin Associates, Inc., *Environmental Noise Assessment*, p. 8.

of the existing structures would exceed the thresholds of annoyance for receptors within the buildings. This would be a significant impact.

Table 4.D.7: Modeled Vibration Levels during Demolition and Below-Grade Work

Sensitive Receptor	Distance to Project Construction (feet)	Modeled Vibration Level		Exceeds Threshold?	
		PPV (in/sec)	Lv (VdB)	Potential Building Damage	Potential Human Annoyance
On-site Residential (1333 Gough St.)	6.67	0.646	104.2	Yes	Yes
Residential, Health Center (1400 Geary Blvd., The Sequoias)	6.67	0.646	104.2	Yes	Yes
Other Structures (between 10 and 45 feet away)	10	0.352	98.9	No	Yes
All Other Receptors (more than 45 feet away)	45	0.037	79.3	No	No

Notes:

PPV = peak particle velocity; in/sec = inches per second; Lv = vibration levels; VdB = vibration velocity level is reported in decibels relative to a level of 1×10^{-6} inches per second.

Vibration levels over 0.5 in/sec PPV would trigger a potential structural impact for modern buildings, and over 80 VdB would be a level where a significant vibration impact could be considered to occur due to human annoyance.

Source level of 87 VdB for large bulldozer: Federal Transit Administration, 2006. Transit Noise and Vibration Impact Assessment, available on the internet at www.fta.dot.gov/documents/FTA_Noise_and_Vibration_Manual.pdf.

Source: Aspen Environmental Group, 2014

Vibration levels that could cause structural damage are much higher than those that could cause human annoyance. This means that structural damage would not be expected to occur if vibration levels are low enough to avoid human response. There are no known historic structures within 45 feet of the proposed construction, and the existing residential buildings and health center facility adjacent to the project site are modern structures, with reinforced concrete and steel building materials that are not especially susceptible to vibration damage. As identified in the “Regulatory Framework” discussion on pp. 4.D.13-4.D.14, groundborne vibration over 0.25 in/sec PPV could trigger a potential structural impact for older or historically significant buildings, and levels over 0.5 in/sec PPV could damage modern commercial and residential buildings. Project demolition, excavation and shoring, and other below-grade work at the western property line would be, at its closest point, about 6 feet, 8 inches from The Sequoias health center facility. This building would be exposed to vibration levels that could exceed the threshold for potential structural damage, as shown in **Table 4.D.7**, above.

Mitigation Measure M-NO-2a: Minimize Vibration Levels During Construction, described below, would mitigate human annoyance caused by vibration by providing a community liaison to respond to and address complaints, by requiring protective techniques during demolition, and

by phasing activities where feasible.³² Implementation of this measure would avoid excessive groundborne vibration by reducing the potential for vibration to occur at or above 80 VdB, the level that could be considered an annoyance. **Mitigation Measure M-NO-2a** would reduce the significant impact of annoyance to a less-than-significant level by requiring controls and practices that avoid exposure of persons to excessive groundborne vibration. Additionally, although nearby structures are not especially susceptible to potential vibration damage, to conservatively protect buildings within 10 feet of project demolition, excavation and shoring, and other below-grade work, **Mitigation Measure M-NO-2b: Pre-Construction Assessment to Protect Structures from Ground Vibration During Below-Grade Work**, p. 4.D.31, would be necessary. With implementation of this mitigation measure, a preconstruction assessment would be implemented and, if needed, monitoring would be performed during vibration-causing activities to detect ground settlement or lateral movement of structures.³³ **Mitigation Measure M-NO-2b** would reduce the significant impact of potential structural damage to a less-than-significant level by requiring assessment, monitoring, and underpinning where necessary, which would protect structures from the effects of vibration.

Mitigation Measure M-NO-2a: Minimize Vibration Levels During Construction

The following practices shall be incorporated into the construction contract agreement documents to be implemented by the construction contractor:

- Make the Noise Disturbance Coordinator (see Mitigation Measure M-NO-1) available to respond to vibration complaints from nearby vibration-sensitive uses, and submit to the Planning Department and Department of Building Inspection (DBI) a protocol to respond to and track complaints pertaining to vibration. Recurring disturbances shall be evaluated by a qualified acoustical consultant to ensure compliance with applicable standards;
- Select demolition methods not involving impact tools, where possible;
- Avoid vibratory rollers and packers, where possible;
- Operate earth-moving equipment as far away from vibration-sensitive receptors as possible, and prioritize use of smaller, lighter-duty equipment when operation is necessary within 45 feet of sensitive receptors in existing buildings (1333 Gough Street and The Sequoias health center facility at 1400 Geary Boulevard); and
- Phase demolition and ground-impacting activity (excavation and shoring) to reduce occurrences in the same time period, when and where feasible.

³² Federal Transit Administration, *Transit Noise and Vibration Impact Assessment*, May 2006. pp. 12-13 to 12-14.

³³ Ibid.

Mitigation Measure M-NO-2b: Pre-Construction Assessment to Protect Structures from Ground Vibration During Below-Grade Work

The project sponsor shall retain a qualified geotechnical engineer to conduct a pre-construction assessment of existing subsurface conditions and the structural integrity of nearby buildings subject to ground vibration prior to receiving a building permit. If recommended by the geotechnical engineer, for structures or facilities within 10 feet of below-grade activities (1333 Gough Street and The Sequoias health center facility at 1400 Geary Boulevard), the project sponsor shall require groundborne vibration monitoring of nearby structures. The assessment shall be based on the specific conditions at the construction site such as, but not limited to, the following:

- Pre-construction surveying of potentially affected structures;
- Underpinning of foundations of potentially affected structures, as determined necessary by the qualified geotechnical engineer;
- The need for a monitoring program during vibration-causing construction activities to detect ground settlement or lateral movement of structures in the vicinity of demolition, excavation, or shoring. If the engineer determines vibration monitoring is needed, the results of ground vibration monitoring shall be submitted to the Department of Building Inspection (DBI). In the event of unacceptable ground movement, as determined by the DBI, demolition or excavation shall cease and corrective measures shall be implemented. Corrective measures to reduce ground movement from demolition or excavation include use of non-impact demolition tools and adding protective shoring. Ground stabilization measures shall be reevaluated and approved by the Director of Building Inspection.

Implementing the feasible steps to minimize vibration as specified in **Mitigation Measure M-NO-2a** would provide quantifiable reductions of construction vibration levels, by avoiding certain types of equipment most likely to cause higher levels of vibration, by phasing activities, and by prioritizing use of smaller, lighter-duty equipment near buildings with sensitive receptors. **Table 4.D.8: Modeled Vibration Levels for Mitigated Equipment** shows the predicted ground vibration levels for the nearest receptors during use of a typical small bulldozer.

With implementation of **Mitigation Measures M-NO-2a** and **M-NO-2b**, potential impacts with respect to human annoyance from groundborne vibration during construction, and with respect to structural damage, would be reduced to levels that would be considered less than significant.

Table 4.D.8: Modeled Vibration Levels for Mitigated Equipment

Sensitive Receptor	Distance to Project Construction (feet)	Modeled Vibration Level		Exceeds Threshold?	
		PPV (in/sec)	Lv (VdB)	Potential Building Damage	Potential Human Annoyance
On-site Residential (1333 Gough St.)	6.67	0.022	75.2	No	No
Residential, Health Center (1400 Geary Blvd., The Sequoias)	6.67	0.022	75.2	No	No
Other Structures (between 10 and 45 feet away)	10	0.012	69.9	No	No
All Other Receptors (more than 45 feet away)	45	0.001	50.3	No	No

Notes:

PPV = peak particle velocity; in/sec = inches per second; Lv = vibration levels; VdB = vibration velocity level is reported in decibels relative to a level of 1×10^{-6} inches per second.

Vibration levels over 0.5 in/sec PPV would trigger a potential structural impact for modern buildings, and over 80 VdB would be a level where a significant vibration impact could be considered to occur due to human annoyance.

Source level of 58 VdB for small bulldozer: Federal Transit Administration, 2006. Transit Noise and Vibration Impact Assessment, available on the internet at www.fta.dot.gov/documents/FTA_Noise_and_Vibration_Manual.pdf.

Source: Aspen Environmental Group, 2014

Operation

Impact NO-3: Operation of the proposed project would not generate noise levels in excess of standards established in the *San Francisco General Plan* or Noise Ordinance and would not result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project. (*Less than Significant*)

Operation of the proposed project would introduce additional noise sources to the area, including additional motor vehicle traffic and new mechanical systems, such as ventilation equipment. The noise from operational activities would occur in a setting where existing sensitive receptors on and adjacent to the project site are exposed to elevated existing noise levels, based on the land use compatibility standards in the *San Francisco General Plan*. The proposed project would result in an increase of about 954 net-new daily vehicle trips, but this would only be a small increase compared to the tens of thousands of vehicles that travel on Geary Boulevard and Gough Street, and the proposed project would increase by 10 percent the traffic on Post Street in the vicinity of the project site.³⁴ Generally, traffic must double in volume to produce a noticeable increase in noise levels. Based on baseline noise conditions (see **Table 4.D.2** and **Table 4.D.3**, p. 4.D.9 and p. 4.D.10, respectively) and existing traffic volumes on adjacent roadways, the addition of project-related vehicle trips to the circulation system and additional associated traffic noise would

³⁴ LCW Consulting, *1333 Gough St/1481 Post St Transportation Impact Study*, Case No. 2005.0679E, July 29, 2014.

not result in a noticeable noise increase in the project surroundings compared to the existing noise levels generated by current traffic volumes on adjacent roadways. The additional traffic would not generate noise levels in excess of standards in the *San Francisco General Plan* or result in a substantial increase above the levels existing without the project. Therefore, increased vehicle trips associated with the proposed project would represent a less-than-significant increase in ambient noise levels.

As described above under “Project Features” on pp. 4.D.18-4.D.20, access to off-street parking would be altered under the proposed project or project variants. Under the proposed project or project variants, the existing vehicular ingress and egress from Gough Street and Geary Boulevard at the southeast corner of the project site would be eliminated, the existing vehicular ingress and egress from Gough Street at the northeastern corner of the project site would be retained, new vehicular ingress and egress on Post Street would be constructed, and a new one-way vehicular ingress on Geary Boulevard to off-street loading would be constructed. The differences between the proposed project and the project variants are related to number of curb cuts along Post Street to provide access to off-street parking. Traffic noise generated by vehicles using the retained Gough Street access at the northeastern corner of the project site would be comparable to that under existing conditions. However, with new vehicular ingress and egress on Post Street and the addition of occasional delivery and service vehicles (e.g., Federal Express delivery vehicles), traffic noise along Geary Boulevard and Post Street would be slightly greater than that under existing conditions. Project- or project variant-related vehicular noise related to off-street parking access would be brief and would not contribute to a substantial increase in 24-hour ambient noise levels for on-site and neighboring noise-sensitive uses.

Short-term noise from truck deliveries or service vehicles at the proposed off-street loading area would also contribute to the 24-hour ambient noise levels. Regularly scheduled garbage collection service or other deliveries or pick-ups could occur in the nighttime or early morning hours, in a manner similar to the services and deliveries that occur for on-site and nearby existing uses. Although the proposed project would move the existing loading area below ground, residences on the project site nearest to and overlooking the loading entryway on Geary Boulevard and the exit on Post Street would experience noise from truck movements. Residential units located off the project site would be too far away to experience substantial changes in noise from truck and service vehicles. It is not generally practical to limit the hours of garbage collection, as this task must be completed on an area-wide basis in the morning before traffic and parked vehicles become hindrances. The loading area would be enclosed within the building envelope and isolated from nearby noise-sensitive residential uses, thus shielding receptors from substantial noise from truck deliveries or garbage collection. Therefore, loading activities associated with the proposed project or project variants would represent a less-than-significant

increase in ambient noise levels and would not contribute to a substantial increase in 24-hour ambient noise levels for on-site residences or neighboring noise-sensitive residential uses.

The proposed project would include new mechanical equipment for building utilities, including ventilation equipment (HVAC equipment) and other building mechanical systems. The standby power generator and other mechanical systems would be located in the mechanical rooms on the north and south portions of the roof of the new 36-story, 398-foot-tall building (see **Figure 2.9: Proposed Mechanical and Penthouse Plan**, p. 2.16). The boiler room, chiller room, and other mechanical systems would be located in a mechanical room at Basement Level 1 (see **Figure 2.13: Proposed Basement Level 1 Parking Plan**, p. 2.25). Placing the equipment on the roof would place the sources about 30 feet higher than the top floor of the adjacent sensitive receptors in the 25-story Sequoias residential tower and more than 250 feet higher than 14-story 1333 Gough Street. The details of the equipment are still in development, and final design would ultimately be presented in plans to be prepared in the future specifying the specific locations and performance requirements. Where possible, fixed sources of noise would generally be enclosed or below grade, which provides noise insulation, but since cooling or dehumidification equipment and heat pumps would need to be exposed to the outside, these noise sources may be difficult to shield. As stated in “Regulatory Framework,” p. 4.D.17, the City’s Noise Ordinance limits noise from residential properties to 5 dBA over the ambient noise level at the property boundary or the nearest vertical plane at the boundary between properties. The project sponsor would enclose or noise-proof the equipment to ensure compliance with the ordinance, which would also ensure that project-related stationary noise sources would be controlled in a manner consistent with the *San Francisco General Plan*. Compliance with the Noise Ordinance is mandatory and ensures that noise from the proposed building’s mechanical and electrical systems would represent a less-than-significant increase in ambient noise levels.

In conclusion, noise caused by project- or variant-related operational activities would not significantly increase the ambient noise levels of the area and would be consistent with the standards established in the *General Plan* and the City’s Noise Ordinance. Therefore, the operational noise caused by the proposed project or project variants would result in a less-than-significant impact. No mitigation is required.

Impact NO-4: The proposed project’s new residential uses and open spaces would not be substantially affected by existing noise levels. (*Less than Significant*)

The proposed project would introduce new noise-sensitive residential uses to a densely developed urban neighborhood with elevated ambient noise levels. The Environmental Setting section, p. 4.D.3, explains that sleep disturbance can occur when continuous interior noise levels exceed 30 dBA or when intermittent interior noise levels exceed 45 dBA. The *San Francisco General Plan* Land Use Compatibility Guidelines for Community Noise (see **Table 4.D.4**, p. 4.D.15)

indicate that any new residential construction or development in areas with noise levels above 60 dBA (L_{dn}) should be undertaken only after a detailed analysis of noise reduction requirements is made and needed noise insulation features are included in the design. In areas where exterior noise levels exceed 65 dBA (L_{dn}), new residential construction or development is generally discouraged, but if it does proceed, a detailed analysis of noise reduction requirements must be undertaken and needed noise insulation features included in the design of such development. Since 24-hour ambient noise measurements indicate that exterior noise levels on the boundaries of the project site are at least 68.3 dBA (L_{dn}), the proposed new residential uses could experience potentially significant impacts due to land use-noise incompatibility.

Because the proposed project's new residential development would be made up of attached units (i.e., multi-family residential), the new residential development would be subject to noise insulation standards in Title 24 of the California Code of Regulations. This state standard requires meeting an interior noise level of 45 dBA (L_{dn}) in any habitable room. Where such units are proposed in areas subject to outdoor noise levels greater than 60 dBA (L_{dn}), the standard requires designing the dwelling units to meet this 45 dBA L_{dn} interior noise level. Achieving compliance with the Title 24 standards would ensure sufficient noise insulation for the proposed project's new residential uses and would result in an interior noise level consistent with the *San Francisco General Plan Land Use Compatibility Guidelines for Community Noise* (see **Table 4.D.4**, p. 4.D.15) for noise-sensitive development within the project site. The DBI enforces the Title 24 standards as part of the building permit and inspection process.

Due to the elevated levels of existing ambient noise, the design of the proposed project's new residential units would need to achieve about 25 dBA and 35 dBA in exterior-to-interior noise reductions along Post Street and Geary Boulevard, respectively, to comply with applicable performance standards and achieve interior noise levels below 45 dBA.³⁵ Achieving a 25 to 35 dBA exterior-to-interior noise reduction is feasible with currently available materials normally used for high-rise residential buildings if windows and doors remain closed. Because the proposed project would provide air conditioning or mechanical ventilation for all residential units, it would be possible for exterior windows and doors to remain closed to meet the required interior sound level. Thus, a façade consisting of an exterior wall and window/wall assemblies having a minimum laboratory-tested sound transmission class (STC) rating of 30 and 35 would provide sufficient insulation along Post Street and Geary Boulevard, respectively.³⁶ Because the proposed residential use would be able to achieve 25 dBA and 35 dBA in exterior-to-interior

³⁵ Brown-Buntin Associates, Inc., *Environmental Noise Assessment*.

³⁶ STC 30 window assemblies consist of a 5/8-inch insulated unit with two layers of 1/8-inch glass separated by a 3/8-inch airspace. STC 35 window assemblies consist of a single layer of 1/4-inch laminated glass or a 1-inch-thick insulated glazing unit consisting of two layers of 1/4-inch glass separated by a 1/2-inch airspace. Other glazing combinations could be used to achieve the same or better acoustical performance.

noise reduction along Post Street and Geary Boulevard, respectively, using typical window assemblies, the proposed project with exterior windows and doors remaining closed would provide the necessary noise insulation to protect interiors from the noise of rooftop mechanical equipment on the upper floors of nearby buildings as well as from existing traffic noise. Therefore, the proposed project's new residential units would not be substantially affected by existing noise levels.

Users of the proposed ground-floor and terraced open spaces would be exposed to traffic noise and other environmental noise of the dense urban setting. Because the proposed project's open spaces would be located in a densely developed urban area, users of these spaces would not expect quiet as an essential element of the space. The open spaces would not be a noise-sensitive use or warrant additional site design features to be consistent with the *San Francisco General Plan Land Use Compatibility Guidelines for Community Noise*.

In conclusion, the proposed project's new residential units and open spaces would experience less-than-significant effects from existing noise levels. No mitigation is necessary.

Impact NO-5: Operation of the proposed project would not generate excessive groundborne vibration. (*Less than Significant*)

Project-related operations, after completion of construction, would involve few sources of groundborne vibration such as heavy-duty trucks for refuse collection, delivery trucks, and moving vans. Regularly scheduled garbage collection service or other deliveries or pick-ups could occur in the nighttime or early morning hours, in a manner similar to the services and deliveries that occur for the nearby existing uses. Because routine operation of motor vehicles or trucks within or near the project site would not involve heavy construction equipment, any potential vibration impacts associated with the proposed project's operational activities would be considered less than significant, and no mitigation is required.

CUMULATIVE IMPACT EVALUATION

Reasonably foreseeable future development in the immediate vicinity of the project site is described in detail in **Section 4.A, Introduction**, pp. 4.A.6-4.A.7. Reasonably foreseeable cumulative development in the vicinity of the project site would be subject to the Noise Ordinance enforced by DBI, DPW, and the Police Department, as well as Planning Department development standards. Some of the new development expected to occur in the vicinity of the project site would likely occur at the same time that the proposed project construction activities are planned. Future year 2040 cumulative traffic noise conditions are also considered here. The future traffic conditions take into account the expected growth in housing and employment for San Francisco and the nine-county Bay Area.

Impact C-NO-1: Construction of the proposed project in combination with other past, present, and reasonably foreseeable future projects in the project vicinity would result in a cumulatively considerable contribution to significant temporary or periodic cumulative increases in ambient noise and vibration levels in the project vicinity above levels existing without the proposed project. (*Less than Significant with Mitigation*)

Construction Noise

Construction noise is a localized impact that decreases as distance from the source increases and rapidly attenuates when line-of-sight is blocked by buildings or other intervening features. Of the reasonably foreseeable future projects in the project vicinity, only the proposed Geary Bus Rapid Transit (BRT) project (a corridor-specific transportation infrastructure project immediately south of the project site) is close enough to the project site to cumulatively affect noise levels at the same noise-sensitive uses that would be affected by construction noise from the proposed project, should such activities occur within the same time period. Geary BRT construction activities at this location would include the repair, replacement, and/or other modifications to the road surface, curbs, or utilities; construction of BRT stations; and, depending on the alternative that would ultimately be chosen, one existing travel lane (in each direction) would be reconfigured to accommodate either side-running bus-only lanes, center-running bus-only lanes, or a transition zone from side-running to center-running bus-only lanes. Construction activities at the other future project sites within a roughly ¼-mile radius of the project site would not contribute to cumulative construction noise at the project site because of their distance from the site and the presence of intervening structures. The other future projects that would be nearby but more than 300 feet from the site boundary include the approved California Pacific Medical Center (CPMC) Cathedral Hill medical campus project at 1101 Van Ness Avenue / 1255 Post Street; the proposed mixed-use buildings at 1634-1690 Pine Street, 1527-1545 Pine Street, and 1800 Van Ness Avenue / 1749 Clay Street; and the proposed Van Ness BRT transportation infrastructure project.

As described in Impact NO-1, project construction would take approximately 27 months, with the highest noise levels generated during the initial nine to ten months of construction. The proposed project would be required to meet all applicable construction noise standards established in the Noise Ordinance. However, the proximity of noise-sensitive receptors to project construction activities would result in a significant construction noise impact, and **Mitigation Measure M-NO-1** was identified to reduce the impact to a less-than-significant level.

If construction for the proposed Geary BRT project were to overlap with the construction of the proposed project, the closest noise-sensitive receptors could experience significant temporary or periodic cumulative increases in ambient noise. As with the proposed project, construction activities for the Geary BRT project would be required to comply with the Noise Ordinance and would be subject to enforcement of the Noise Ordinance by the Department of Public Works

(DPW) and the Police Department. As explained above, the Noise Ordinance prohibits construction activities between 8 p.m. and 7 a.m., and limits noise from any individual piece of construction equipment, except impact tools, to 80 dBA (Ldn) at 100 feet from the noise source. Since Geary BRT project construction would occur within the public-right-of-way, construction activities are also subject to Article 2.4 of the San Francisco Public Works Code and DPW Order No. 176-707 (Regulations for Excavating and Restoring Streets). DPW Order No. 176-707 stipulates that construction activities be conducted in a manner that causes the least possible noise consistent with normal construction efficiency. Furthermore, if work in the public right-of-way is planned between the hours of 8 p.m. and 7 a.m., a Night Noise Permit from DPW would need to be obtained. Per § 2908 of the Noise Ordinance, the Director of Public Works imposes a condition on all Night Noise Permits that prohibits high level or impact noise after 10 PM.

Noise levels are reduced with distance from the source, as illustrated in **Table 4.D.5** on p. 4.D.23. The closest noise-sensitive receptors to the project site (residences at 1333 Gough Street and The Sequoias at 1400 Geary Boulevard) would also be about 50 to 100 feet away from construction activities associated with the proposed Geary BRT. Therefore, noise from the Geary BRT construction activities would be noticeable and annoying to some noise-sensitive receptors. Construction projects within public rights-of-way, such as the Geary BRT project, have space constraints which tend to limit the size of equipment (i.e., smaller backhoes or bobcats instead of larger backhoes or large excavators); thus, the noise-generating potential of construction equipment would be more limited than that for a typical development project. Furthermore, the duration of construction activities that would be expected for the Geary BRT project along the segment closest to the project site would be limited to a 2- to 3-month period. Excavation and construction within the public right-of-way must comply with Article 2.4 of the San Francisco Public Works Code, and DPW Orders regulating excavation in City streets.³⁷ DPW orders require contractors to conduct their operations in a manner that causes the least possible noise consistent with normal construction efficiency. Operation or use of equipment that makes excessive or unusual noise is not allowed. However, the construction of the proposed project, if it occurred at the same time that the Geary BRT was under construction adjacent to the project site, could result in a significant cumulative noise impact, and the contribution of the proposed project to this impact would be cumulatively considerable. With compliance with the Public Works Code and DPW orders on the part of the BRT construction contractor, and implementation of mitigation identified for project construction noise (**Mitigation Measure M-NO-1**), a significant cumulative impact would be avoidable. Thus, while cumulative construction activities would temporarily increase ambient noise levels intermittently when the construction periods for these

³⁷ San Francisco Public Works Code, Article 2.4, available online at <http://www.sfdpw.org/index.aspx?page=739>. Accessed December 4, 2012. San Francisco Department of Public Works, Order No. 176-707 (Revised), Regulations for Excavating and Restoring Streets in San Francisco, March 26, 2007, available online at <http://www.sfdpw.org/index.aspx?page=295>. Accessed March 27, 2013.

projects overlap, the proposed project's contribution to significant temporary or periodic cumulative increases in ambient noise would be less than significant with implementation of the project-specific **Mitigation Measure M-NO-1**.

Noise from project-related construction truck trips could combine with noise from truck trips associated with nearby cumulative development. However, due to the urban nature of the project area and existing ambient noise levels from traffic on roadways that are adjacent to and near the cumulative development sites, such as Geary Boulevard, Van Ness Avenue, and Pine Street, any cumulative increase in ambient noise levels from mobile construction-related traffic would be brief and intermittent in nature and not expected to contribute substantially to temporary increases in ambient noise levels during construction.

Implementation of **Mitigation Measure M-NO-1** would ensure that the proposed project's incremental contribution to short-term exposure of noise-sensitive receptors to increased construction noise would not result in a cumulatively considerable contribution to cumulative construction noise impacts.

Groundborne Vibration

Construction-related vibration over 80 VdB would be considered the threshold where a significant vibration impact could occur due to human annoyance. Vibration at this level would be limited to within 300 feet or less, depending on the source. As vibration is a localized impact that attenuates rapidly as distance from the source increases, construction of any development projects at least 500 feet away would have limited or no potential to subject shared adjacent receptors to cumulative construction-related vibration (should such activities occur within the same time period). Therefore, the cumulative projects at 1101 Van Ness Avenue / 1255 Post Street (the CPMC Cathedral Hill medical campus), 1527-1545 Pine Street, 1634-1690 Pine Street, 1800 Van Ness Avenue / 1749 Clay Street, and the Van Ness BRT Project would not combine with vibration from construction of the proposed project because these development sites are located more than 500 feet from the project site. Since these future projects would be developed outside the area of potential project-related vibration, they would not contribute to cumulative groundborne vibration impacts.

The potential for cumulative vibration levels would be highest during the initial nine to ten months of the 27-month construction period for the proposed project. The construction activities associated with the proposed Geary BRT project along the adjacent segment of Geary Boulevard, discussed above, would likely employ construction equipment that generates groundborne vibration, e.g., jackhammers for pavement breaking, bulldozers for grading, and heavy trucks for material hauling. However, construction equipment that typically generates the greatest level of groundborne vibration (sonic and impact pile drivers) are not expected to be used to construct the

Geary BRT project. Therefore, construction of the Geary BRT project is not expected to generate excessive groundborne vibration levels. Since the overlap of the proposed project's construction activities with those of the Geary BRT would be brief and limited to a 2- to 3-month period and the Geary BRT would not be expected to result in significant groundborne vibration, the proposed project would not result in a cumulatively considerable contribution to significant cumulative impacts associated with groundborne vibration.

This impact would be less than significant, and no mitigation is required.

Impact C-NO-2: Operation of the proposed project in combination with other past, present, and reasonably foreseeable future projects in the project vicinity would not result in a cumulatively considerable contribution to significant cumulative permanent increases in ambient noise levels in the project vicinity above levels existing without the project. (*Less than Significant*)

Each development project in the vicinity of the project site would generate operational noise and could contribute to an overall increase in ambient noise conditions of the area. The noise environment of the area would be influenced by traffic increases and stationary or fixed sources of noise included in reasonably foreseeable development, such as new heating and ventilation equipment, emergency power generators, and other mechanical equipment.

Implementation of the proposed project and reasonably foreseeable projects would increase traffic noise levels in an environment that already experiences elevated ambient noise levels. Future traffic noise levels on the segment of Geary Boulevard in the project vicinity could be comparable to or slightly lower than existing traffic noise levels, as a result of the reduction in overall travel lane capacity and the proposed Geary BRT, according to future 2040 cumulative traffic increases presented in **Section 4.C, Transportation and Circulation**.

Noise from stationary mechanical equipment associated with cumulative development could cause a substantial increase in the noise environment for noise-sensitive receptors near each project. However, no cumulative development projects would be located near enough to the project site to potentially affect the noise-sensitive receptors that could also be potentially affected by the proposed project. Noise from mechanical equipment at the cumulative development sites would be subject to the Noise Ordinance; therefore, the operation of the project and cumulative development projects would not cause a significant cumulative impact. These projects would not have the potential to result in a cumulatively considerable contribution to significant cumulative long-term noise impacts. As discussed above under Impact NO-3, the operation of project-related stationary mechanical equipment would comply with applicable performance standards identified in the City's Noise Ordinance. As a result, the proposed project or variants would not result in a cumulatively considerable contribution to exposure of noise-

4. Environmental Setting, Impacts, and Mitigation

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sensitive receptors to significant cumulative permanent increases in ambient noise levels in the project vicinity. This impact would be less than significant, and no mitigation is required.

E. AIR QUALITY

INTRODUCTION

Section 4.E, Air Quality, evaluates the potential air quality and health risks and hazards impacts that could result from short-term construction and long-term operation of the proposed project. It identifies both project-level and cumulative environmental impacts, as well as feasible mitigation measures where appropriate that could reduce or avoid the identified impacts. This section incorporates the results of the *Air Quality Memorandum for the 1333 Gough Street/1481 Post Street Project*.¹

As discussed on p. 69 in the Initial Study Section E.7, Air Quality (**Appendix A** to this EIR), project impacts related to the Air Quality subtopic of objectionable odors affecting a substantial number of people would be less than significant. Therefore, this subtopic is not addressed in the EIR.

ENVIRONMENTAL SETTING

REGIONAL AIR QUALITY

The project site and vicinity is within the jurisdiction of the Bay Area Air Quality Management District (BAAQMD). The BAAQMD is a regional agency with jurisdiction for regulating air quality within 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. As part of the region's efforts to achieve and maintain federal and state ambient air quality standards, the BAAQMD maintains the regional emission inventory of air pollution sources, including stationary, mobile, and area-wide sources. The BAAQMD is also responsible for issuing permits to construct and operate stationary sources of pollutants, and for implementing the programs to review the air quality impacts of new stationary sources. The regional prevailing winds, topography, and weather, including sunlight and high temperatures, also play a role in regional air quality problems. Warmer temperatures create the conditions that can increase ozone formation. In addition, higher temperatures would likely result in increased electricity use to power air conditioners and refrigerators, which can cause increased operation of the region's fossil-fuel-fired power plants to meet the demand.

¹ Aspen Environmental Group, *Air Quality Memorandum for the 1333 Gough Street/1481 Post Street Project*, September 9, 2013 (hereinafter referred to as "*Air Quality Memo*"). A copy of this document is available for review at the San Francisco Planning Department, 1650 Mission Street, Suite 400, in Case File No. 2005.0679E.

Climate, Topography, and Meteorology

The San Francisco Bay Area has a Mediterranean climate characterized by mild, dry summers; mild, moderately wet winters (about 90 percent of the annual total rainfall occurs during the November to April period); moderate daytime onshore breezes; and moderate humidity. The climate is dominated by a strong, semi-permanent, subtropical high-pressure cell over the northeastern Pacific Ocean. Weather is moderated by the adjacent oceanic heat reservoir that leads to fog. In summer, the northwest winds to the west of the coastline are drawn into the interior valleys through the Golden Gate and over the lower topography of the San Francisco Peninsula. This channels wind so that it sweeps eastward and widens downstream across the region. In winter, periods of storminess tend to alternate with periods of stagnation and light winds. Winds from the northwest, west-northwest, west, and west-southwest dominate at the project site such that area-wide emissions tend to be carried eastward toward downtown San Francisco (see **Figure 2.1: Project Location**, in **Chapter 2, Project Description**, p. 2.4).

CRITERIA AIR POLLUTANTS

As required by the 1970 Federal Clean Air Act, the United States Environmental Protection Agency (USEPA) initially identified six criteria air pollutants that are pervasive in urban environments and for which state and federal health-based ambient air quality standards have been established. USEPA calls these pollutants “criteria air pollutants” because the agency has regulated them by developing specific public-health-based and welfare-based criteria as the basis for setting permissible emission levels. Ozone, carbon monoxide (CO), nitrogen dioxide (NO₂), sulfur dioxide (SO₂), and lead are the six criteria air pollutants originally identified by USEPA. Since that time, subsets of particulate matter have been identified for which permissible levels have been established. These include particulate matter of 10 microns in diameter or less (PM₁₀) and particulate matter of 2.5 microns in diameter or less (PM_{2.5}).

The BAAQMD’s air quality monitoring network consists of 28 air quality monitoring stations throughout the SFBAAB, providing information on ambient concentrations of criteria air pollutants within the SFBAAB. The BAAQMD monitoring station at 16th and Arkansas streets in San Francisco’s lower Potrero Hill area is the closest monitoring station to the project site.²

Table 4.E.1: Summary of San Francisco Air Quality Monitoring Data (2008–2012) is a five-year summary of the highest annual criteria air pollutant concentrations collected at that monitoring station. Table 4.E.1 compares measured pollutant concentrations with the most stringent applicable ambient air quality standards (state or federal).

² Data from this single location does not describe pollutant levels throughout San Francisco, as these levels may vary depending on distance from key emissions sources and local meteorology. However, the BAAQMD monitoring network does provide a reliable picture of pollutant levels over time.

4. Environmental Setting, Impacts, and Mitigation
E. Air Quality

Table 4.E.1: Summary of San Francisco Air Quality Monitoring Data (2008–2012)

Pollutant	Most Stringent Applicable Standard	Number of Days Standards Were Exceeded and Maximum Concentrations Measured				
		2008	2009	2010	2011	2012
Ozone						
- Days 1-hour Std. Exceeded	>90 ppb ^a	0	0	0	0	0
- Max. 1-hour Conc. (ppb)		82	72	79	70	69
- Days 8-hour Std. Exceeded	>70 ppb ^a	0	0	0	0	0
- Max. 8-hour Conc. (ppb)		66	56	51	54	48
Carbon Monoxide (CO)						
- Days 1-hour Std. Exceeded	>20 ppm ^a	0	0	0	0	0
- Max. 1-hour Conc. (ppm)		5.7	4.3	1.8	1.8	2.0
- Days 8-hour Std. Exceeded	>9 ppm ^a	0	0	0	0	0
- Max. 8-hour Conc. (ppm)		2.3	2.9	1.4	1.2	1.2
Suspended Particulates (PM ₁₀)						
- Days 24-hour Std. Exceeded ^c	>50 µg/m ³ ^a	0	0	0	0	1
- Max. 24-hour Conc. (µg/m ³)		41	36	40	46	51
- Annual Average (µg/m ³)	>20 µg/m ³ ^a	22.0	18.7	19.9	19.5	17.4
Suspended Particulates (PM _{2.5})						
- Days 24-hour Std. Exceeded	>35 µg/m ³	0	1	3	2	1
- Max. 24-hour Conc. (µg/m ³)		29.4	35.6	45.3	47.5	35.7
- Annual Average (µg/m ³)	>12 µg/m ³ ^{a, d}	9.8	9.7	10.5	9.5	8.2
Nitrogen Dioxide (NO ₂)						
- Days 1-hour Std. Exceeded	>100 ppb ^{b, e}	0	0	0	0	1
- Max. 1-hour Conc. (ppb)		62	59	93	93	124
- Annual Average (ppb)	>30 ppb ^a	16	15	13	14	13
Sulfur Dioxide (SO ₂)						
- Days 1-hour Std. Exceeded	>75 ppb ^{b, f}	N/A	N/A	N/A	N/A	N/A
- Max. 1-hour Conc. (ppb)		N/A	N/A	N/A	N/A	N/A
- Days 24-hour Std. Exceeded	>40 ppb ^a	0	N/A	N/A	N/A	N/A
- Max. 24-hour Conc. (ppb)		5	N/A	N/A	N/A	N/A

Notes:

Bold values are in excess of applicable standard. “N/A” indicates that data is not available. An exceedance is not necessarily a violation of the standard and only persistent exceedances lead to designation of an area as nonattainment.

conc. = concentration; ppm = parts per million; ppb=parts per billion; µg/m³ = micrograms per cubic meter; > means greater than

^a State standard, not to be exceeded.

^b Federal standard, not to be exceeded.

^c Based on a sampling schedule of one out of every six days, for a total of approximately 60 samples per year.

^d In March 2013, USEPA lowered the federal standard for average annual PM_{2.5} concentrations from 15 to 12 µg/m³. Future monitoring will be evaluated based on this standard; however, it is not reflected in the 2012 pollution summary.

^e New 1-hour federal standard of 100 ppb introduced in 2010; based on a 3-year average of the 98th percentile of the annual distribution of daily maximum 1-hour average concentrations.

^f New 1-hour federal standard of 75 ppb introduced in 2010; based on a 3-year average of the 99th percentile of the annual distribution of daily maximum 1-hour average concentrations.

Source: BAAQMD, Bay Area Air Pollution Summary, 2008–2012. Website accessed on June 23, 2013 at <http://www.baaqmd.gov/Divisions/Communications-and-Outreach/Air-Quality-in-the-Bay-Area/Air-Quality-Summaries.aspx>.

Construction activities (short-term) typically result in emissions of ozone precursors and particulate matter in the form dust (fugitive dust) and exhaust (e.g., vehicle tailpipe emissions). Emissions of ozone precursors and particulate matter are primarily a result of the combustion of fuel from on-road and off-road vehicles. However, ROGs are also emitted from activities that involve painting, other types of architectural coatings, or asphalt paving. The proposed project includes demolition of the existing parking garage structure, construction of a new 262-unit, 36-story, residential building (the proposed 1481 Post Street building), modifications to 1333 Gough Street, and construction of a new subsurface parking garage.

Ozone

Ozone is a secondary air pollutant produced in the atmosphere through a complex series of photochemical reactions involving reactive organic gases (ROG) and nitrogen oxides (NOx). The main sources of ROG and NOx, often referred to as ozone precursors, are combustion processes (including motor vehicle engines) and the evaporation of solvents, paints, and other architectural coatings, and asphalt paving and fuels. In the Bay Area, automobiles are the single largest source of ozone precursors. Ozone is referred to as a regional air pollutant because its precursors are transported and diffused by wind concurrently with ozone production through the photochemical reaction process. Ozone causes eye irritation, airway constriction, and shortness of breath and can aggravate existing respiratory diseases such as asthma, bronchitis, and emphysema.³

Table 4.E.1 shows that the most stringent applicable standards (the state 1-hour standard of 90 parts per billion [ppb] and the state 8-hour standard of 70 ppb) were not exceeded in San Francisco between 2008 and 2012.

Carbon Monoxide

CO is an odorless, colorless gas usually formed as the result of the incomplete combustion of fuels. The single largest source of CO is motor vehicles; the highest emissions occur during low travel speeds, stop-and-go driving, cold starts, and hard acceleration. Exposure to high concentrations of CO reduces the oxygen-carrying capacity of the blood and can cause headaches, nausea, dizziness, and fatigue; impair central nervous system function; and induce angina (chest pain) in persons with serious heart disease. Very high levels of CO can be fatal. As shown in **Table 4.E.1**, the more stringent state CO standards (state 1-hour standard of 20 parts per million [ppm] and the state 8-hour standard of 9 ppm) were not exceeded between 2008 and 2012. Measurements of CO indicate hourly maximums ranging between about 10 to 30 percent of the

³ Bay Area Air Quality Management District (BAAQMD), *California Environmental Quality Act Air Quality Guidelines*, adopted June 2010 and updated May 2011 and May 2012 (hereinafter “BAAQMD, CEQA Air Quality Guidelines”), p. C-15. Available online at <http://www.baaqmd.gov/Divisions/Planning-and-Research/CEQA-GUIDELINES/Updated-CEQA-Guidelines.aspx>. Accessed June 23, 2013.

state standard, and maximum 8-hour CO levels that are approximately 15 to 30 percent of the allowable 8-hour standard.

Particulate Matter (PM₁₀ and PM_{2.5})

Particulate matter is a class of air pollutants that consists of heterogeneous solid and liquid airborne particles from manmade and natural sources. PM₁₀ is often termed “coarse” particulate matter and is made of particulates that are 10 microns or less in diameter. PM_{2.5}, termed “fine” particulate matter, is composed of particles that are 2.5 microns or less in diameter. In the Bay Area, motor vehicles generate about one-half of the air basin’s particulates, through tailpipe emissions as well as brake pad and tire wear. Wood burning in fireplaces and stoves, industrial facilities, and ground-disturbing activities such as construction are other sources of such fine particulates. These fine particulates are small enough to be inhaled into the deepest parts of the human lung and can cause adverse health effects.

According to the California Air Resources Board (ARB), studies in the United States and elsewhere “have demonstrated a strong link between elevated particulate levels and premature deaths, hospital admissions, emergency room visits, and asthma attacks,” and studies of children’s health in California have demonstrated that particle pollution “may significantly reduce lung function growth in children.”⁴ The ARB also reports that statewide attainment of particulate matter standards could prevent thousands of premature deaths, lower hospital admissions for cardiovascular and respiratory disease and asthma-related emergency room visits, and avoid hundreds of thousands of episodes of respiratory illness in California.⁵ Among the regulated criteria air pollutants, particulates are a serious ongoing health hazard contributing to the death of approximately 200 to 500 people per year in the Bay Area. High levels of particulates can exacerbate chronic respiratory ailments, such as bronchitis and asthma, and have been associated with increased emergency room visits and hospital admissions.^{6,7}

⁴ California Air Resources Board (ARB), “Recent Research Findings: Health Effects of Particulate Matter and Ozone Air Pollution,” January 2004. Available online at http://www.powerworks.com/Documents/ozone_air_pollutants.pdf. Accessed September 20, 2013.

⁵ ARB and Office of Environmental Health Hazard Assessment, “Staff Report: Public Hearing to Consider Amendments to the Ambient Air Quality Standards for Particulate Matter and Sulfates”, May 2002, pp. 9-18 to 9-24. Available online at <http://www.arb.ca.gov/research/aaqs/std-rs/pm-final/pm-final.htm>. Accessed June 23, 2013.

⁶ ARB, *Air Quality and Land Use Handbook: A Community Health Perspective*, April 2005 (hereinafter “ARB, *Air Quality and Land Use Handbook*”) p. 12. Available online at <http://www.arb.ca.gov/ch/landuse.htm>. Accessed June 23, 2013.

⁷ BAAQMD, *CEQA Air Quality Guidelines*, May 2011, pp. 5-2 and D-38. This document is available for review at the San Francisco Planning Department, 1650 Mission Street, Suite 400, in Case File No. 2005.0679E.

Table 4.E.1 shows that exceedances of the state annual average PM_{10} standard ($20 \mu\text{g}/\text{m}^3$) have not occurred in San Francisco since 2009. It is estimated that the state 24-hour PM_{10} standard has not been exceeded except for 6 days in 2012.⁸ The BAAQMD began monitoring $\text{PM}_{2.5}$ concentrations in San Francisco in 2002. In March 2013, USEPA lowered the federal annual average $\text{PM}_{2.5}$ standard from $15 \mu\text{g}/\text{m}^3$ to $12 \mu\text{g}/\text{m}^3$, which is now consistent with the state ambient air quality standards. **Table 4.E.1** shows that this standard for annual average $\text{PM}_{2.5}$ was not exceeded in San Francisco between 2008 and 2012. However, on the 24-hour averaging basis, concentrations of $\text{PM}_{2.5}$ have exceeded the federal 24-hour $\text{PM}_{2.5}$ standard ($35 \mu\text{g}/\text{m}^3$), and in San Francisco this level was exceeded once in 2012, twice in 2011, three times in 2010, and once in 2009. $\text{PM}_{2.5}$ is of particular concern because epidemiologic studies have demonstrated that people who live near freeways and high-traffic roadways have poorer health outcomes, including increased asthma symptoms and respiratory infections and decreased pulmonary function and lung development in children.⁹

Nitrogen Dioxide

NO_2 is a reddish brown gas that is a byproduct of combustion processes. Mobile sources (motor vehicles and other transportation sources) and industrial operations are the main sources of nitrogen oxides, which include NO_2 . Aside from contributing to ozone formation, NO_2 can increase the risk of acute and chronic respiratory disease and reduce visibility. NO_2 may be visible as a coloring component on high pollution days, especially in conjunction with high ozone levels. In 2010, USEPA implemented a new federal 1-hour NO_2 standard at the level of 100 ppb. **Table 4.E.1** shows that the current federal and state standards for NO_2 have been met in the Bay Area except for one day of exceedance in San Francisco in 2012 of the federal 1-hour NO_2 standard.

Sulfur Dioxide

SO_2 is a colorless acidic gas with a strong odor. It is produced by the combustion of sulfur-containing fuels such as oil, coal, and diesel. SO_2 has the potential to damage materials and can cause health effects at high concentrations. It can irritate lung tissue and increase the risk of acute and chronic respiratory disease. **Table 4.E.1** shows that the state's 24-hour standard for SO_2 (40 ppb) was met in San Francisco in 2008. Although more recent data is not available, pollutant

⁸ PM_{10} is sampled every sixth day; therefore, for each day sampled at a level over the standard, up to six actual days are estimated to be over the standard.

⁹ San Francisco Department of Public Health (DPH), *Assessment and Mitigation of Air Pollutant Health Effect from Intra-urban Roadways: Guidance for Land Use Planning and Environmental Review*, May 2008, p. 7. Available online at <http://www.sfdph.org/dph/files/EHSdocs/AirQuality/MitigateRoadAQLUConflicts.pdf>. Accessed June 23, 2013.

trends suggest that this standard will continue to be met for the foreseeable future. In 2010, USEPA implemented a new federal 1-hour SO₂ standard at the level of 75 ppb.

Lead

Leaded gasoline (phased out in the United States beginning in 1973), paint (on older houses and cars), smelters (metal refineries), and the manufacture of lead storage batteries have been the primary sources of lead released into the atmosphere. Lead has a range of adverse neurotoxic health effects, and children are at special risk. Some lead-containing chemicals cause cancer in animals. Lead levels in the air have decreased substantially since leaded gasoline was eliminated. Ambient lead concentrations are only monitored on an as-warranted, site-specific basis in California. On October 15, 2008, USEPA strengthened the federal ambient air quality standard for lead by lowering it from 1.5 µg/m³ to 0.15 µg/m³. USEPA revised the monitoring requirements for lead in December 2010. These requirements focus on airports and large urban areas, resulting in three new monitors at Bay Area airports. No new monitoring stations are required in San Francisco.¹⁰

TOXIC AIR CONTAMINANTS

Toxic air contaminants (TACs) are defined in California Health and Safety Code § 39655 as an air pollutant which may cause or contribute to an increase in mortality or serious illness, or which may pose a present or potential hazard to human health. Potential human health effects of TACs include birth defects, neurological damage, cancer, and death. 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 that of another.

TACs do not have ambient air quality standards, but are regulated by the BAAQMD using a risk-based approach. The approach uses a health risk assessment to determine what 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 is estimated, and considered together with information regarding the toxic potency of the substances, to provide quantitative estimates of health risks.¹¹

¹⁰ BAAQMD, *2011 Air Monitoring Network Report*, July 1, 2012, pp. 13 and 22, Tables 10 and 11. Available online at <http://www.baaqmd.gov/Divisions/Technical-Services/Ambient-Air-Monitoring/AAMN-Plan.aspx>. Accessed February 20, 2013.

¹¹ 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 stationary source suggest a potential

In addition to monitoring criteria air pollutants, both the BAAQMD and the ARB operate TAC monitoring networks in the San Francisco Bay Area. These stations measure 10 to 15 TACs, depending on the specific station. The TACs selected for monitoring are those that have traditionally been found in the highest concentrations in ambient air, and therefore tend to be substantial contributors to community health risk.

The BAAQMD collects ambient TAC emissions data at its 16th and Arkansas streets monitoring station in San Francisco, which is the only monitoring site for air toxics in San Francisco.

Table 4.E.2: Carcinogenic Toxic Air Contaminants – Annual Average Ambient Concentrations shows ambient concentrations of carcinogenic TACs measured at the Arkansas Street monitoring station and the estimated cancer risks from lifetime (70 years) exposure to these substances.

Table 4.E.2: Carcinogenic Toxic Air Contaminants – Annual Average Ambient Concentrations

Substance	Mean Concentration	Cancer Risk Per Million ^a
<i>Gaseous TACs</i>	(ppb)	
Acetaldehyde	0.68	3
Benzene	0.229	21
1,3-Butadiene	0.044	17
Para-Dichlorobenzene	0.15	10
Carbon Tetrachloride	0.088	23
Ethylene Dibromide	0.006	3
Formaldehyde	1.32	10
Perchloroethylene	0.018	0.7
Methylene Chloride	0.12	0.4
Methyl tertiary-Butyl Ether (MTBE)	0.26	0.3
Chlorform	0.023	0.6
Trichloroethylene	0.01	0.1
<i>Particulate TACs</i>	(ng/m ³)	
Chromium (Hexavalent)	0.05	8

Notes: All values are from BAAQMD 2011 monitoring data from the 16th and Arkansas Street station, except for Para-Dichlorobenzene (2006), Ethylene Dibromide (1992), and MTBE (2003).

ppb=parts per billion; ng/m³ = nanograms per cubic meter

^a Cancer risks were estimated by applying published unit risk values to the measured concentrations.

Source: California Air Resources Board, Ambient Air Toxics Summary, 2011. Available online at <http://www.arb.ca.gov/adam/toxics/sitesubstance.html>. Accessed June 23, 2013.

The results of TAC measurements at the Arkansas Street monitoring station are used by BAAQMD in assessing regional concentrations across the Bay Area as a whole and by the San Francisco Department of Public Health (DPH) in evaluating localized risks and especially where

public health risk. Such an assessment evaluates the chronic, long-term health effects, calculating the increased risk of cancer as a result of exposure to one or more TACs for the source in question.

vulnerable populations are impacted. The cancer risks associated with mean TAC concentrations in eastern San Francisco are comparable with those in other urbanized portions of the Bay Area and are primarily the result of roadway-related pollutants.

Roadway-Related Pollutants

Motor vehicles are responsible for a large share of air pollution and also contribute to particulates by generating road dust and through tire wear. Engine exhaust, from diesel, gasoline, and other combustion engines, is a complex mixture of particles and gases, with collective and individual toxicological characteristics. Vehicle tailpipe emissions contain numerous TACs, including benzene, 1,3-butadiene, formaldehyde, acetaldehyde, acrolein, naphthalene, and diesel exhaust.¹² While each constituent pollutant in engine exhaust may have a unique toxicological profile, health effects have been associated with proximity, or exposure, to vehicle-related pollutants

collectively as a mixture.¹³ Exposures to PM_{2.5} are strongly associated with mortality, respiratory diseases, and lung development in children, and other endpoints such as hospitalization for cardiopulmonary disease.¹⁴ As discussed below, people living in proximity to freeways or busy roadways have poorer health outcomes. Air pollution monitoring done in conjunction with epidemiological studies has confirmed that roadway-related health effects vary with modeled exposure to particulate matter and NO₂. In traffic-related studies, the additional non-cancer health risk attributable to roadway proximity was seen within 1,000 feet of the roadway and was strongest within 300 feet. As a result, the ARB recommends that new sensitive land uses not be located within 500 feet of a freeway or urban roads carrying 100,000 vehicles per day.^{15,16} In 2008, San Francisco adopted amendments to the Health Code (discussed under “Regulatory Framework,” on p. 4.E.21), requiring new residential projects near high-volume roadways to be screened for exposure hazards and, where indicated, to conduct an analysis of exposure and to mitigate hazards through design and ventilation.

¹² DPH, *Assessment and Mitigation of Air Pollutant Health Effects from Intra-Urban Roadways: Guidance for Land Use Planning and Environmental Review*, May 2008. Available online at <http://www.sfdph.org/dph/files/EHSdocs/AirQuality/MitigateRoadAQLUConflicts.pdf>. Accessed June 23, 2013.

¹³ Delfino RJ, 2002, “Epidemiologic evidence for asthma and exposure to air toxics: linkages between occupational, indoor, and community air pollution research,” *Environmental Health Perspectives*, 110(S4):573-589.

¹⁴ DPH, *Assessment and Mitigation of Air Pollutant Health Effects from Intra-Urban Roadways: Guidance for Land Use Planning and Environmental Review*, May 2008. Available online at <http://www.sfdph.org/dph/files/EHSdocs/AirQuality/MitigateRoadAQLUConflicts.pdf>. Accessed June 23, 2013.

¹⁵ ARB, *Air Quality and Land Use Handbook*, p. 4, Table 1-1. Available online at <http://www.arb.ca.gov/ch/landuse.htm>. Accessed June 23, 2013.

¹⁶ This recommendation is put forth to minimize potential non-cancer health effects of exposure to pollutants known to increase incidence of asthma and other respiratory ailments, particularly fine particulates, as well as cancer risk from exposure to DPM and chemicals from automobile exhaust.

Diesel Particulate Matter

In addition to PM_{2.5}, diesel particulate matter (DPM) is also of concern. The ARB identified DPM as a TAC in 1998, primarily based on evidence demonstrating cancer effects in humans.¹⁷ The exhaust from diesel engines includes hundreds of different gaseous and particulate components, many of which are toxic. Mobile sources such as trucks and buses are among the primary sources of diesel emissions, and concentrations of DPM are higher near heavily traveled highways. The estimated cancer risk from exposure to diesel exhaust is much higher than the risk associated with any other toxic air pollutant routinely measured in the region. The ARB estimated the average Bay Area cancer risk from DPM, based on a population-weighted average ambient diesel particulate concentration, at about 480 in one million as of 2000.^{18,19} According to ARB, the average statewide cancer risk from DPM declined from 900 in one million in 1990 to 540 in one million in 2000, representing a 40 percent drop.²⁰ While the ARB has not provided more recent estimates for the SFBAAB, the average statewide cancer risk from DPM was estimated to have declined from 540 in one million in 2000 to 450 in one million in 2010, indicating that the health risk from DPM continues to decline.²¹

Recent air pollution studies have shown an association between respiratory and other non-cancer health effects and proximity to high traffic roadways. The ARB community health risk assessments and regulatory programs have produced air quality information about certain types of facilities for consideration by local authorities when siting new residences, schools and educational facilities, day care centers, parks and playgrounds, and medical facilities (i.e., sensitive land uses).²² Sensitive land uses deserve special attention because children, pregnant women, the elderly, and those with existing health problems are especially vulnerable to the non-

¹⁷ ARB, Fact Sheet, "The Toxic Air Contaminant Identification Process: Toxic Air Contaminant Emissions from Diesel-fueled Engines", October 1998. Available online at <http://www.arb.ca.gov/toxics/dieseltac/factsht1.pdf>. Accessed June 23, 2013.

¹⁸ ARB, California Almanac of Emissions and Air Quality - 2009 Edition, p. 5-61 and Table 5-44. Available online at <http://www.arb.ca.gov/aqd/almanac/almanac09/pdf/chap509.pdf>. Accessed June 23, 2013.

¹⁹ This calculated cancer risk values from ambient air exposure in the Bay Area can be compared against the lifetime probability of being diagnosed with cancer in the United States, from all causes, which is more than 40 percent (based on a sampling of 17 regions nationwide), or greater than 400,000 in one million, according to the National Cancer Institute.

²⁰ ARB, California Almanac of Emissions and Air Quality - 2009 Edition, p. 5-44 and Figure 5-12. Available online at <http://www.arb.ca.gov/aqd/almanac/almanac09/pdf/chap509.pdf>. Accessed June 23, 2013.

²¹ Ibid, p. 5-44 and Figure 5-12.

²² As discussed below, parks and playgrounds are generally less sensitive than the other uses listed because exposure times are shorter, resulting in less exposure to pollutants.

cancer effects of air pollution. There is also substantial evidence that children are more sensitive to cancer-causing chemicals.²³

In 2000, the ARB approved a comprehensive Diesel Risk Reduction Plan to reduce diesel emissions from both new and existing diesel-fueled vehicles and engines. Subsequent ARB regulations apply to new trucks and to diesel fuel. With new controls and fuel requirements, 60 trucks built in 2007 would have the same soot exhaust emissions as one truck built in 1988.²⁴ Despite notable emission reductions, the ARB recommends that proximity to sources of DPM emissions be considered in the siting of new sensitive land uses. The ARB notes that these recommendations are advisory and should not be interpreted as defined “buffer zones.” ARB acknowledges that land use agencies must balance other considerations, including housing and transportation needs, the benefits of urban infill, community economic development priorities, and other quality-of-life issues. With careful evaluation of exposure, health risks, and affirmative steps to reduce risk where necessary, ARB’s position is that infill development, mixed-use, higher density, transit-oriented development, and other concepts that benefit regional air quality can be compatible with protecting the health of individuals at the neighborhood level.²⁵

EXISTING SENSITIVE RECEPTORS

Air quality does not affect every individual in the population in the same way, and some groups are more sensitive to adverse health effects than others. As noted above, population subgroups sensitive to the health effects of air pollutants include the elderly and the young, those with higher rates of respiratory disease such as asthma and chronic obstructive pulmonary disease, and those with other environmental or occupational health exposures (e.g., indoor air quality) that affect cardiovascular or respiratory diseases. Sensitive receptors are defined by the BAAQMD as “Facilities or land uses that include members of the population that are particularly sensitive to the effects of air pollutants, such as children, the elderly, and people with illnesses. Examples include schools, hospitals and residential areas.”²⁶ Compared to commercial and industrial areas, people generally spend longer periods of time at their residences, with associated greater exposure to ambient air quality conditions.²⁷ Parks and playgrounds are considered moderately sensitive to poor air quality because persons engaged in strenuous work or exercise also have increased sensitivity to poor air quality; however, exposure times are generally far shorter in

²³ ARB, *Air Quality and Land Use Handbook*, p. ES-1. Available online at <http://www.arb.ca.gov/ch/landuse.htm>. Accessed June 23, 2013.

²⁴ Pollution Engineering, New Diesel Fuel Rules Start. Available online at <http://www.pollutionengineering.com/articles/85480-new-clean-diesel-fuel-rules-start>. Accessed June 23, 2013.

²⁵ ARB, *Air Quality and Land Use Handbook*, p. ES-2.

²⁶ BAAQMD, *CEQA Air Quality Guidelines*, May 2011, p. E-4.

²⁷ The factors responsible for variation in exposure are also often similar to factors associated with greater susceptibility to air quality health effects.

parks and playgrounds than in residential locations and schools, for example, which typically reduces overall exposure to pollutants.

The project site is located in a densely developed and populated residential and commercial area in the Cathedral Hill area of the Western addition at the eastern edge of the Japantown neighborhood. On Assessors Block 697 (the project site block) there are sensitive receptors at 1333 Gough Street on the project site (see **Figure 4.E.1: Sensitive Air Quality Receptors in the Vicinity of the Project Site**) and at 1400 Geary Boulevard (The Sequoias),²⁸ a 3- to 25-story²⁹ retirement community complex immediately adjacent to the west property line of the project site. The 25-story Sequoias residential tower is located about 70 feet west of the property line shared with the project site and houses elderly and/or infirm residents. The easternmost portion of the neighboring Sequoias property is occupied by a 3-story health center facility, built in 1997 and licensed for 50 skilled nursing beds, 18 units of assisted living, and 19 memory care beds. At its closest point, The Sequoias health center facility is about 6 feet, 8 inches west of the property line shared with the project site. See **Figure 2.10: Proposed North (Post) Elevation** on p. 2.18.

In the vicinity of the project site, the prevailing land uses are residential with the closest sensitive uses located along Post, Laguna, Sutter, and Gough streets at 1490-1592 Post Street/1619 Sutter Street; 1450 Post Street;³⁰ 1410, 1406-1408, 1402, and 1400 Post Street; 1355 Post Street; 1550 Sutter Street;³¹ 1533 Sutter Street; 1531 Sutter Street;³² 1527 Sutter Street; 1521 Sutter; 1515 Sutter Street; 1483 Sutter Street; 1407 Gough Street; 1409 Gough Street; 1388 Gough Street; and 1200 Gough Street.

Several school/daycare facilities are located in the vicinity of the project site: Stuart Hall High School (1715 Octavia Street), the La Mel School (1801 Bush Street), the Montessori House of Children (1187 Franklin Street), the Sacred Heart Cathedral Preparatory School (1055 Ellis Street and 1100 Ellis Street), and the Rosa Parks Elementary School (1501 O'Farrell Street). To the

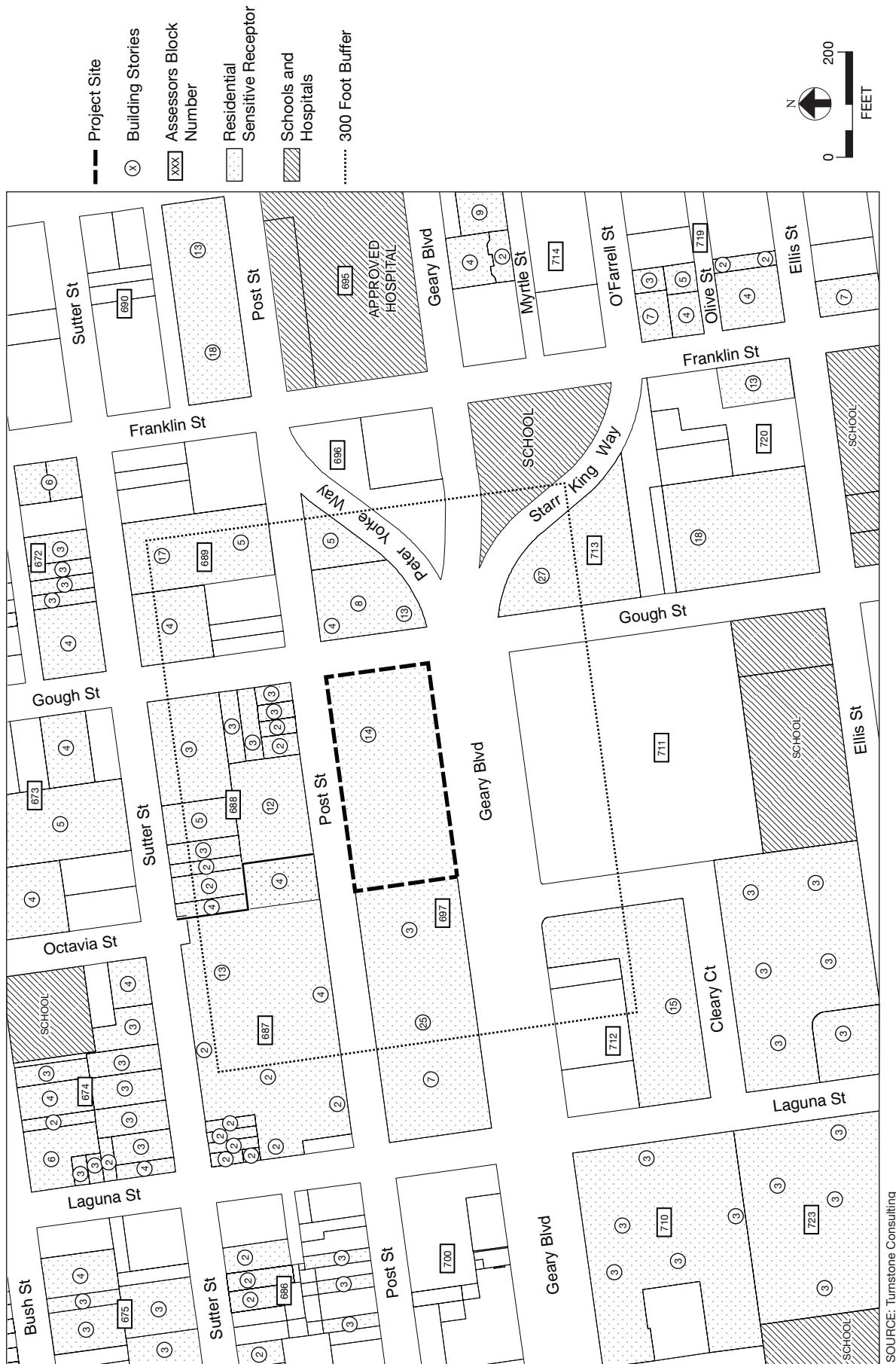
²⁸ The Sequoias is a licensed continuing care retirement community operated by the Northern California Presbyterian Homes and Services with on-site assisted living and a health center facility with skilled nursing beds.

²⁹ This EIR describes building heights as a measurement in feet above ground surface and/or as a number of building stories. For the purposes of this EIR, one residential story is equivalent to about 10 to 12 feet, although ground-floor stories are often higher (up to 15 feet). The term "low-rise" refers to buildings that are 1 to 4 stories and up to 40 feet tall. The term "mid-rise" refers to buildings that are 5 to 8 stories and up to 85 feet tall. The term "high-rise" refers to buildings that are above 85 feet tall.

³⁰ The Carlisle is a licensed full-service continuing care retirement community operated by Sunrise Senior Living providing on-site independent and assisted living services.

³¹ Vintage Coventry is a licensed Residential/Respite Care Program with a 210-bed capacity.

³² Kimochi Home is a licensed Residential/Respite Care Program with a 20-bed capacity.



1333 GOUGH STREET/1481 POST STREET

**FIGURE 4.E.1: SENSITIVE AIR QUALITY RECEPTORS
IN THE VICINITY OF THE PROJECT SITE**

SOURCE: Turnstone Consulting

northwest of the project site there is a senior residential care facility at 1881 Bush Street,³³ and to the southeast there is an assisted living center at 1035 Van Ness Avenue.³⁴ To the east of the project site is the approved California Pacific Medical Center Cathedral Hill medical campus at 1101 Van Ness Avenue.

REGULATORY FRAMEWORK

FEDERAL/STATE

Federal Ambient Air Quality Standards

The 1970 Clean Air Act (as amended in 1990) required that regional planning and air pollution control agencies prepare a regional air quality plan to outline the measures by which both stationary and mobile sources of pollutants will be controlled in order to achieve all standards by the deadlines specified in the Clean Air Act. These ambient air quality standards are intended to protect the public health and welfare, and they specify the concentration of pollutants (with an adequate margin of safety) to which the public can be exposed without adverse health effects. They are designed to protect those segments of the public most susceptible to respiratory distress, including asthmatics, the very young, the elderly, people weak from other illness or disease, or persons engaged in strenuous work or exercise. Healthy adults can tolerate occasional exposure to air pollution levels that are somewhat above ambient air quality standards before adverse health effects are observed.

In general, the SFBAAB experiences low concentrations of most pollutants when compared to federal standards, except for ozone and particulate matter (PM₁₀ and PM_{2.5}), for which standards are exceeded periodically. The current attainment³⁵ status for the SFBAAB, with respect to state and federal standards, is summarized in **Table 4.E.3: State and Federal Ambient Air Quality Standards**. The SFBAAB is designated as “nonattainment” for ozone and PM_{2.5} federal standards, “unclassified” for federal PM₁₀ and NO₂ standards, and “attainment” for federal standards for other pollutants.

³³ The Kokoro is a licensed Residential/Respite Care Program with a 61-bed capacity.

³⁴ The Avenue is a licensed Residential/Respite Care Program with a 145-bed capacity.

³⁵ “Attainment” status refers to those regions that are meeting federal and/or state standards for a specified criteria air pollutant. “Non-attainment” refers to regions that do not meet federal and/or state standards for a specified criteria air pollutant. “Unclassified” refers to regions where there is not enough data to determine the region’s attainment status for a specified criteria air pollutant.

Table 4.E.3: State and Federal Ambient Air Quality Standards

Pollutant	Averaging Time	(State) CAAQS ^a		(Federal) NAAQS ^b	
		Standard	Attainment Status	Standard	Attainment Status
Ozone	1 hour	0.09 ppm	N	---	See Note c
	8 hour	0.07 ppm ^d	N	0.075 ppm	N
Carbon Monoxide (CO)	1 hour	20 ppm	A	35 ppm	A
	8 hour	9 ppm	A	9 ppm	A
Nitrogen Dioxide (NO ₂)	1 hour	0.18 ppm	A	0.100 ppm	U
	Annual	0.03 ppm	---	0.053 ppm	A
Sulfur Dioxide (SO ₂)	1 hour	0.25 ppm	A	0.075 ppm	A
	24 hour	0.04 ppm	A	0.14 ppm	A
	Annual	---	---	0.03 ppm	A
Particulate Matter (PM ₁₀) ^e	24 hour	50 µg/m ³	N	150 µg/m ³	U
	Annual	20 µg/m ³	N	---	---
Fine Particulate Matter (PM _{2.5})	24 hour	---	---	35 µg/m ³	N
	Annual	12 µg/m ³	N	12 µg/m ³	See Note f
Sulfates	24 hour	25 µg/m ³	A	---	---
Lead	30 day	1.5 µg/m ³	---	---	---
	Quarterly	---	---	1.5 µg/m ³	A
Hydrogen Sulfide	1 hour	0.03 ppm	U	---	---
Visibility-Reducing Particles	8 hour	See Note g	U	---	---

Notes:

A = Attainment; N = Nonattainment; U = Unclassified; --- = Not Applicable, no applicable standard; ppm = parts per million; µg/m³ = micrograms per cubic meter.

^a CAAQS = California ambient air quality standards. CAAQS for ozone, carbon monoxide (except Lake Tahoe), sulfur dioxide (1-hour and 24-hour), nitrogen dioxide, particulate matter, and visibility-reducing particles are values that are not to be exceeded. All other state standards shown are values not to be equaled or exceeded.

^b NAAQS = national ambient air quality standards. NAAQS, other than ozone and particulates, and those based on annual averages or annual arithmetic means, are not to be exceeded more than once a year. The 8-hour ozone standard is attained when the three-year average of the fourth highest daily concentration is 0.075 ppm or less. The 24-hour PM₁₀ standard is attained when the three-year average of the 99th percentile of monitored concentrations is less than the standard. The 24-hour PM_{2.5} standard is attained when the three-year average of the 98th percentile is less than the standard.

^c USEPA revoked the federal 1-hour ozone standard on June 15, 2005.

^d This state 8-hour ozone standard was approved in April 2005 and became effective in May 2006.

^e State standard = annual geometric mean; federal standard = annual arithmetic mean.

^f In March 2013, USEPA implemented a new annual PM_{2.5} standard of 12.0 µg/m³. Although SFBAAB is likely to meet the new 2013 federal standard, USEPA will not decide on attainment status until 2014 at the earliest.

^g Statewide visibility-reducing particle standard (except Lake Tahoe Air Basin): Particles in sufficient amount to produce an extinction coefficient of 0.23 per kilometer when the relative humidity is less than 70 percent. This standard is intended to limit the frequency and severity of visibility impairment due to regional haze and is equivalent to a 10-mile nominal visual range.

Source: Bay Area Air Quality Management District, *Air Quality Standards and Attainment Status*. Available online at http://hank.baaqmd.gov/pln/air_quality/ambient_air_quality.htm. Accessed June 24, 2013.

In June 2004, the Bay Area was designated as a marginal nonattainment area of the federal 8-hour ozone standard. On May 27, 2008 USEPA lowered the federal 8-hour ozone standard from 0.80 to 0.75 parts per million (ppm). On February 7, 2012 USEPA proposed a rule that takes necessary steps to implement the 2008 federal 8-hour ozone standard, establishing an approach for classification of nonattainment areas – areas not meeting the 2008 ozone standard.³⁶ The SFBAAB is designated as “nonattainment” for ozone federal standards.

On March 18, 2013, USEPA lowered the federal annual standard for PM_{2.5} from 15 µg/m³ to 12 µg/m³.³⁷ USEPA is also making updates and improvements to the nation’s PM_{2.5} monitoring network that include relocating a small number of monitors to measure fine particulates near heavily traveled roads in areas with populations of 1 million or more. These relocations will be phased in over two years (2015-2017) and will not require additional monitors. USEPA anticipates making initial attainment/nonattainment designations by December 2014, with those designations likely becoming effective in early 2015. States would have until 2020 (five years after designations are effective) to meet the revised annual PM_{2.5} attainment standard, although a state may request a possible extension to 2025, depending on the severity of an area’s fine particle pollution problems and the availability of pollution controls. The SFBAAB is designated as “unclassified” for federal PM₁₀ standards. In 2009, USEPA designated the SFBAAB as “nonattainment” for the federal 24-hour PM_{2.5} standard based on regionally persistent exceedances of the federal 24-hour PM_{2.5} standard (see **Table 4.E.1** on p. 4.E.3).

On January 22, 2010, USEPA revised the health-based federal standards for NO₂.³⁸ A new federal 1-hour NO₂ standard was set at the level of 100 ppb, a level that defines the maximum allowable concentration anywhere in an area. To determine compliance with the 2010 federal 1-hour NO₂ standard, USEPA established new ambient air monitoring and reporting requirements for NO₂ which required all new NO₂ monitors to begin operating on January 1, 2013. These requirements include adding monitors near major roads in urban areas with a population of 500,000 or more. Sixteen new near-roadway monitoring sites will be required in California, three of which will be in the Bay Area. In addition, USEPA, working with the states, will site a subset of monitors in locations to help protect communities that are susceptible and vulnerable to NO₂-related health effects. On March 7, 2013, USEPA issued a final rule to revise the deadlines by

³⁶ USEPA, *Fact Sheet, Proposed Rule - Implementation of the 2008 National Ambient Air Quality Standards for Ozone: Nonattainment Area Classifications Approach and Attainment Deadlines*. Available online at <http://www.epa.gov/air/ozonepollution/pdfs/20120203factsheet.pdf>. Accessed June 24, 2013.

³⁷ USEPA, *Factsheet – Overview of EPA’s Revision to the Air Quality Standards for Particle Pollution (Particulate Matter)*. Available online at <http://www.epa.gov/airquality/particlepollution/2012/decfsoverview.pdf>. Accessed May 8, 2013.

³⁸ USEPA, *Factsheet, Revisions to Ambient Nitrogen Dioxide Monitoring Requirements*. Available online at <http://www.epa.gov/oaqps001/nitrogenoxides/pdfs/20130307fs.pdf>. Accessed May 8, 2013.

which the near-road monitors within the NO₂ monitoring network are to be operational. USEPA established a series of deadlines that require states and local agencies to begin operating the near-road component of the NO₂ network in phases between January 1, 2014 and January 1, 2017. This monitoring network will collect data that are compared to the federal air quality ambient standards for NO₂. Currently, USEPA has designated the SFBAAB as an unclassified area for the new 1-hour NO₂ standard and as an attainment area for the annual NO₂ standard. The ARB will revise the area designation recommendations, as appropriate, once the new monitoring data become available.

In 2010, USEPA implemented a new federal 1-hour SO₂ standard at the level of 75 ppb. USEPA established requirements that adjustments to the existing monitoring network be made in order to ensure that monitors meeting the network design regulations for the new federal 1-hour SO₂ standard are sited and operational by January 2013. No new monitoring stations were required in San Francisco County.³⁹ On February 15, 2013, USEPA published notice in the Federal Register of proposed nonattainment designations for the 2010 federal 1-hour SO₂ standard. No California areas are included in the proposal; all areas of the state remain undesignated.

State Ambient Air Quality Standards

Although the Federal Clean Air Act established national ambient air quality standards (NAAQS), individual states retained the option to adopt more stringent standards and to include other pollution sources. California had already established its own air quality standards when federal standards were established, and because of the differing implementing authorities in California, there is considerable diversity between the state and federal air quality standards, as shown in **Table 4.E.3**. California ambient air quality standards tend to be at least as protective as federal standards and are generally more stringent.

In 1988, California passed the California Clean Air Act (California Health and Safety Code § 39000 et seq.), which, like its federal counterpart, called for the designation of areas as attainment or nonattainment, but based on state ambient air quality standards rather than the federal standards. As indicated in **Table 4.E.3**, the SFBAAB is designated as “nonattainment” for state ozone, PM₁₀, and PM_{2.5} standards, and attains the state standards for other pollutants.

Bay Area Air Quality Planning Relative to State and Federal Standards

Air quality plans developed to meet federal requirements are referred to as State Implementation Plans. The federal and state Clean Air Acts require plans to be developed for areas designated as

³⁹ BAAQMD, *2011 Air Monitoring Network Report*, July 1, 2012, p. 19 and Table 7. Available online at <http://www.baaqmd.gov/Divisions/Technical-Services/Ambient-Air-Monitoring/AAMN-Plan.aspx>. Accessed February 20, 2013.

nonattainment (with the exception of areas designated as nonattainment for the state PM₁₀ standard). The *Bay Area 2010 Clean Air Plan (2010 CAP)* was adopted on September 15, 2010, by the BAAQMD, in cooperation with the Bay Area Metropolitan Transportation Commission (MTC), the Bay Conservation and Development Commission (BCDC), and the Association of Bay Area Governments (ABAG). The primary objectives of the *2010 CAP* are to 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 *2010 CAP* represents the most current applicable air quality plan for the SFBAAB and the Bay Area's most recent triennial assessment of the region's strategy to attain the state 1-hour ozone standard. The *2010 CAP* serves to update the Bay Area *2005 Ozone Strategy*, adopted in 2006, in accordance with the requirements of the California Clean Air Act to (1) implement "all feasible measures" to reduce ozone; (2) provide a control strategy to reduce ozone, particulate matter, toxic air contaminants, and greenhouse gases in a single, integrated plan; (3) review progress in improving air quality in recent years; and (4) establish emission control measures to be adopted or implemented. The control strategy includes stationary-source control measures to be implemented through BAAQMD regulations; mobile-source control measures to be implemented through incentive programs and other activities; transportation control measures to be implemented through transportation programs in cooperation with the MTC, local governments, transit agencies, and others; and land use, energy, and climate control measures to be implemented primarily through state and local government regulations. The *2010 CAP* represents the Bay Area's most recent triennial assessment of the region's strategy to attain the state 1-hour ozone standard.⁴⁰

Toxic Air Contaminants

In October 2000, the ARB approved a comprehensive Diesel Risk Reduction Plan to reduce diesel emissions from both new and existing diesel-fueled vehicles and engines.⁴¹ In 2008, as part of the Plan, the ARB approved a new regulation for existing heavy-duty diesel vehicles that will require retrofitting and replacement of vehicles (or their engines) over time such that by 2023, all vehicles must have a 2010 model year engine or equivalent. The regulation is anticipated to result in an 80

⁴⁰ BAAQMD, *Bay Area 2010 Clean Air Plan*. Available online at <http://www.baaqmd.gov/Divisions/Planning-and-Research/Plans/Clean-Air-Plans.aspx>. Accessed June 24, 2013.

⁴¹ ARB, *Risk Reduction Plan to Reduce Particulate Matter Emissions from Diesel-Fueled Engines and Vehicles*, October 2000. Available online at <http://www.arb.ca.gov/diesel/documents/rvpFinal.pdf>. Accessed May 8, 2013.

percent decrease in statewide diesel health risk in 2020 from the 2000 risk levels.⁴² Additional regulations apply to new trucks and to diesel fuel.

In 2005, the ARB approved a regulatory measure to reduce emissions of toxic and criteria air pollutants by limiting the idling of new heavy-duty diesel vehicles. The regulations generally limit idling of commercial motor vehicles (including buses and trucks) within 100 feet of a school or residential area for more than five consecutive minutes or periods aggregating more than five minutes in any one hour.⁴³ Buses or vehicles also must turn off their engines upon stopping at a school and must not turn their engines on more than 30 seconds before beginning to depart from a school. Also, Senate Bill 352 (SB 352), adopted by the California legislature in 2003, prohibits locating public schools within 500 feet of a freeway or busy traffic corridor (§ 17213 of the Education Code; § 21151.8 of the Public Resources Code).

In addition to implementing more stringent engine controls (diesel engines produced today have one-eighth the tailpipe exhaust of a truck or bus built in 1990), diesel fuel is required to have lower levels of sulfur. As of June 1, 2006, at least 80 percent of on-road diesel fuel refined in the United States is required to be ultra-low sulfur diesel, which has resulted in a reduction in sulfur emissions by 97 percent. All of the diesel fuel sold in California for use with on-road trucks is now ultra-low sulfur diesel. PM emissions are projected to be reduced by about 7 tons per day in 2014 and another 3 tons per day in 2023; NOx emissions are projected to be reduced by about 88 tons per day in 2023.⁴⁴ These reductions are critical to meeting federal clean air standards. The regulation would also reduce diesel PM emissions by the maximum level achievable from in-use trucks and buses. ARB staff estimates that approximately 3,500 premature deaths statewide would be avoided from implementation of the regulation.⁴⁵

Bay Area Air Quality Management District

The BAAQMD is the regional agency with jurisdiction over the nine-county region located in the SFBAAB. ABAG, MTC, county transportation agencies, cities and counties, and various non-governmental organizations also join in the efforts to improve air quality through a variety of

⁴² ARB, *Facts About Truck and Bus Regulation Emissions Reductions and Health Benefits*, February 25, 2009. Available online at http://www.bcaqmd.org/page/_files/tbhealthfs.pdf. Accessed February 20, 2013.

⁴³ There are 12 exceptions to this requirement (e.g., emergency situations, military, adverse weather conditions, etc.), including when a vehicle's power takeoff is being used to run pumps, blowers, or other equipment; when a vehicle is stuck in traffic, stopped at a light, or under direction of a police officer; when a vehicle is queuing beyond 100 feet from any restricted area; or when an engine is being tested, serviced, or repaired.

⁴⁴ ARB, *Facts About Truck and Bus Regulation Reducing Emissions from Existing Diesel Vehicles*, July 20, 2012. Available online at www.arb.ca.gov/msprog/onrdiesel/documents/fsoverview.pdf. Accessed February 20, 2013.

⁴⁵ Ibid.

programs. These programs include the adoption of regulations and policies, as well as implementation of extensive education and public outreach programs.

The BAAQMD is responsible for attaining and/or maintaining air quality in the region within federal and state air quality standards. Specifically, the BAAQMD has the responsibility to monitor ambient air pollutant levels throughout the region and to develop and implement strategies to attain the applicable federal and state standards.

LOCAL

San Francisco General Plan Air Quality Element

The *San Francisco General Plan (General Plan)* includes the Air Quality Element.⁴⁶ The objectives specified by the City include the following:

- Objective 1: Adhere to State and Federal air quality standards and regional programs.
- Objective 2: Reduce mobile sources of air pollution through implementation of the Transportation Element of the *General Plan*.
- Objective 3: Decrease the air quality impacts of development by coordination of land use and transportation decisions.
- Objective 4: Improve air quality by increasing public awareness regarding the negative health effects of pollutants generated by stationary and mobile sources.
- Objective 5: Minimize particulate matter emissions from road and construction sites.
- Objective 6: Link the positive effects of energy conservation and waste management to emission reductions.

San Francisco Construction Dust Control Ordinance

The San Francisco Health Code Article 22B and San Francisco Building Code § 106A.3.2.6 collectively constitute the Construction Dust Control Ordinance (adopted in July 2008). 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 specific dust control measures whether or not the activity requires a permit from the Department of Building Inspection (DBI). For projects over one-half acre, the Dust Control Ordinance requires that the project sponsor submit a Dust Control Plan for approval by the San Francisco Department of Public Health (DPH) prior to issuance of a building permit by the DBI.

⁴⁶ City and County of San Francisco, Planning Department, Air Quality, An Element of the *General Plan* of the City and County of San Francisco, July 1997, updated in 2000.

Building permits will not be issued 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. The Construction Dust Control Ordinance requires project sponsors and contractors responsible for construction activities to control construction dust on the site or implement other practices that result in equivalent dust control that are acceptable to the Director of Public Health. 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. Reclaimed water must be used if required by Article 21, § 1100 et seq. of the San Francisco Public Works Code. The project site is approximately 1.86 acres in size. Therefore, the project sponsor would be required to prepare a Dust Control Plan.

San Francisco Health Code Provisions Regarding Roadway-Generated Pollutants (Article 38)

San Francisco adopted Article 38 of the San Francisco Health Code in 2008, requiring an Air Quality Assessment for new residential projects of 10 or more units located in proximity to high-traffic roadways, as mapped by the DPH, to determine whether residents would be exposed to unhealthful levels of $PM_{2.5}$. The air quality assessment evaluates the concentration of $PM_{2.5}$ from local roadway traffic that may impact a proposed residential development site. If the DPH air quality assessment indicates that the annual average concentration of $PM_{2.5}$ at the site would be greater than $0.2 \mu g/m^3$, Health Code § 3807 requires development on the site to be designed or relocated to avoid exposure greater than $0.2 \mu g/m^3$, or a ventilation system to be installed that would be capable of removing 80 percent of ambient $PM_{2.5}$ from habitable areas of the residential units. The project site is identified by DPH as being within proximity to high-traffic roadways and subject to the provisions of Article 38.

IMPACTS AND MITIGATION MEASURES

Air quality impacts from land development projects result from project construction and operation. Construction emissions, primarily dust generated by earth-moving activities and pollutants emitted by construction vehicles, would have a short-term effect on air quality. Operational emissions generated by project-related traffic, combustion of natural gas for building space and water heating, and diesel fuel use for back-up power would affect air quality throughout the lifetime of the project.

SIGNIFICANCE CRITERIA

The thresholds for determining the significance of impacts in this analysis are consistent with the environmental checklist in Appendix G of the state *CEQA Guidelines*, which has been adopted and modified by the San Francisco Planning Department. For the purpose of this analysis, the

following applicable thresholds were used to determine whether implementing the project would result in a significant impact on air quality. Implementation of the proposed project would have a significant effect on air quality if the project would:

- Conflict with or obstruct implementation of the applicable air quality plan;
- Violate any air quality standard or contribute substantially to an existing or projected air quality violation;
- Result in a cumulatively considerable net increase of any criteria air pollutant for which the project region is in nonattainment under an applicable federal or state ambient air quality standard (including releasing emissions that exceed quantitative thresholds for ozone precursors); or
- Expose sensitive receptors to substantial pollutant concentrations.

PROJECT FEATURES

The proposed project includes a 36-story, high-rise tower (the proposed 1481 Post Street building) that would contain up to 262 residential units, 2,230 gsf of retail use, an 8,000 gsf fitness center, associated building services, a four-level underground parking garage with 262 spaces for the residential tower and 179 replacement spaces to serve 1333 Gough Street, and open space. The proposed project also includes modifications to the existing 169-unit 1333 Gough Street multi-family residential building on the eastern portion of the project site. Residential units in the proposed tower would be located on the 3rd floor (at approximately 40 feet above grade) through the 36th floor. The proposed project would create new sensitive receptors (in the form of new residential units) as well as introduce new stationary sources of emissions subject to permitting requirements: a diesel-fueled back-up emergency generator and natural gas-fired mechanical systems or boilers. The emergency generator and other mechanical systems would be located in separate mechanical rooms on the north and south portions of the roof (see **Figure 2.9: Proposed Mechanical and Penthouse Plan**, p. 2.16). The boiler room, chiller room, and other mechanical space would be located in a mechanical room at Basement Level 1 (see **Figure 2.13: Proposed Basement Level 1 Parking Plan**, p. 2.25). Development of the proposed project would introduce additional vehicular traffic in the project vicinity. Implementation would require demolition of the existing one-story parking garage that wraps around the ground-floor base of 1333 Gough Street to its north, west, and south and excavation of up to approximately 45 feet below the ground surface. Approximately 83,000 cubic yards of soil would be excavated and removed from the project site. Three optional schemes for vehicular access and sidewalk widths are under consideration as variants to the proposed project, as described in **Chapter 2, Project Description**, pp. 2.30-2.34. The construction and operational impacts of these variants would be the same as those for the proposed project for the purposes of the analysis of air quality impacts.

Project construction would take about 27 months in overlapping phases. Demolition would take about 1.75 months. Excavation and shoring would take about 2.5 months. Foundation work and below grade construction would take about 4.5 months. Base building construction would take about 11 months. Exterior finishing would take about 4 months. Interior finishing would take about 12.5 months.

APPROACH TO ANALYSIS

This section discusses the thresholds for determining whether a project would result in a significant air quality impact in compliance with checklist questions in Appendix G of the state *CEQA Guidelines* (pp. 4.E.21-4.E.22).

Air Quality Plan

The 2010 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 an applicable air quality plan.

Criteria Air Pollutants

As described above under “Regulatory Framework,” pp. 4.E.14-4.E.17, the SFBAAB experiences low concentrations of most pollutants when compared to federal or state standards and is designated as either in attainment or unclassified for most criteria pollutants with the exception of ozone, PM_{2.5}, and PM₁₀, for which these pollutants are designated as nonattainment for either the state or federal standards. 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 nonattainment 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.⁴⁷

Land use projects may contribute to regional criteria air pollutants during the construction and operational phases of a project. This section discusses the thresholds for determining whether a project would result in a significant air quality impact. **Table 4.E.4: Criteria Air Pollutant Significance Thresholds**, below, identifies air quality significance thresholds and is 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.

⁴⁷ BAAQMD *CEQA Air Quality Guidelines*, May 2011, p. 2-1.

Table 4.E.4: Criteria Air Pollutant Significance Thresholds

Pollutant	Construction Thresholds	Operational Thresholds	
	Average Daily Emissions (pounds/day)	Average Daily Emissions (pounds/day)	Annual Average Emissions (tons/year)
ROG ^a	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

Note:

^a ROG = Reactive Organic Gas

Source: BAAQMD, 2011

Ozone Precursors

As discussed above under “Environmental Setting,” p. 4.E.17, the SFBAAB is currently designated as nonattainment for ozone and particulate matter. 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, is 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).⁴⁸ These levels represent emissions 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.

Particulate Matter (PM₁₀ and PM_{2.5})

The federal New Source Review (NSR) program was created by the federal CAA to ensure that stationary sources of air pollution are constructed in a manner that is consistent with attainment of federal health-based ambient air quality standards. For PM₁₀ 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 at which a source is not expected to have an impact on air quality.⁴⁹

Although the regulations specified above apply to new or modified stationary sources, land use development projects result in ROG, NO_x, PM₁₀ and PM_{2.5} emissions as a result of increases in

⁴⁸ BAAQMD, *Revised Draft Options and Justification Report, California Environmental Quality Act Thresholds of Significance*, October 2009, p. 17.

⁴⁹ BAAQMD, *Revised Draft Options and Justification Report, California Environmental Quality Act Thresholds of Significance*, October 2009, p. 16.

vehicle trips, architectural coating, space heating, natural gas combustion, landscape maintenance, 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 ozone precursor or particulate matter emissions. Due to the temporary nature of construction activities, only the average daily thresholds are applicable to construction phase emissions.

Emissions calculations of criteria air pollutants have been prepared for the proposed project and are shown below.⁵⁰ The calculations present estimated construction and operational criteria air pollutant emissions from the proposed project.

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 controls fugitive dust.⁵¹ Individual measures have been shown to reduce fugitive dust by anywhere from 30 to 90 percent.⁵² The BAAQMD has identified a number of BMPs to control fugitive dust emissions from construction activities.⁵³ The City's Construction Dust Control Ordinance (Ordinance 176-08, effective July 30, 2008) requires a number of measures to control fugitive dust to ensure that construction projects do not result in visible dust. The BMPs employed in compliance with the City's Construction Dust Control Ordinance are an effective strategy for controlling construction-related fugitive dust.

Local Health Risks and Hazards

In addition to criteria air pollutants, individual projects may emit 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 of short-term) adverse effects to human health, including carcinogenic effects. 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.

⁵⁰ *Air Quality Memo*, Attachment A01.

⁵¹ Western Regional Air Partnership, *WRAP Fugitive Dust Handbook*, September 7, 2006. Available online at http://www.wrapair.org/forums/dejfdh/content/FDHandbook_Rev_06.pdf. Accessed February 18, 2013.

⁵² BAAQMD, *Revised Draft Options and Justification Report, California Environmental Quality Act Thresholds of Significance*, October 2009, p. 27.

⁵³ BAAQMD, *CEQA Air Quality Guidelines*, May 2012, pp. 8-3 to 8-4.

As discussed above under “Environmental Setting,” p. 4.E.11, 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 for other land uses. Exposure assessment guidance typically assumes that residences would be exposed to air pollution 24 hours per day, 350 days per year, for 70 years, and age-specific weighting factors may be incorporated in calculating cancer risks experienced by infants, children, and adolescents to reflect their expected special sensitivity to carcinogens. Therefore, assessments of air pollutant exposure to residents typically result in the greatest adverse health outcomes of all population groups.

In an effort to identify areas of San Francisco most adversely affected by sources of TACs, San Francisco partnered with the BAAQMD to inventory and assess air pollution and exposures from mobile, stationary, and area sources within San Francisco. Areas with poor air quality, termed “air pollution hot spots,” were identified based on two health-protective criteria: (1) excess cancer risk from the contribution of emissions from all modeled sources greater than 100 per one million population, and/or (2) cumulative PM_{2.5} concentrations greater than 10 µg/m³.

Excess Cancer Risk

The above one hundred per one million persons (100 excess cancer risk) criterion is based on USEPA guidance for conducting air toxic analyses and making risk management decisions at the facility and community-scale level.⁵⁴ As described by the BAAQMD, 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,⁵⁵ USEPA states that it “...strives to provide maximum feasible protection against risks to health 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.⁵⁶

⁵⁴ BAAQMD, *Revised Draft Options and Justification Report, California Environmental Quality Act Thresholds of Significance*, October 2009, p. 67.

⁵⁵ 54 Federal Register 38044, September 14, 1989.

⁵⁶ BAAQMD, *Revised Draft Options and Justification Report, California Environmental Quality Act Thresholds of Significance*, October 2009, p. 67.

Fine Particulate Matter

In April 2011, 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 concluded that the previous federal standard of $15 \mu\text{g}/\text{m}^3$ for annual $\text{PM}_{2.5}$ should be revised to a level within the range of 13 to $11 \mu\text{g}/\text{m}^3$. In March 2013, USEPA implemented a new annual $\text{PM}_{2.5}$ standard of $12 \mu\text{g}/\text{m}^3$. Air pollution hot spots for San Francisco are based on the health protective annual $\text{PM}_{2.5}$ standard of $11 \mu\text{g}/\text{m}^3$, as supported by USEPA’s Particulate Matter Policy Assessment, although lowered to $10 \mu\text{g}/\text{m}^3$ to account for uncertainty in accurately predicting air pollutant concentrations using emissions modeling programs.

Land use projects within these air pollution hot spots require special consideration to determine whether the project’s activities would expose sensitive receptors to substantial air pollutant concentrations or add emissions to areas already adversely affected by poor air quality. This EIR evaluates whether the proposed project would result in new sensitive land uses located within air pollution hot spots or whether the project would result in new sources of emissions that would substantially affect nearby sensitive receptors.

Impact on the Elderly

As discussed above on pp. 4.E.11-4.E.14, the analysis of air quality impacts on sensitive receptors under CEQA in this EIR includes and assumes the presence of members of the population who may be more sensitive to air quality impacts due to age (the elderly or the young) or health.⁵⁷ Thus, the analysis of air quality in this EIR accounts for senior residents of The Sequoias and nearby retirement communities and residential care facilities. However, the decision-makers may consider special concerns of seniors and the infirm related to construction of the proposed project independent of the environmental review process under CEQA, as part of the decision to approve, modify, or disapprove the proposed project.

⁵⁷ Ambient air quality standards “are established to protect even the most sensitive individuals in our communities [emphasis added]. An air quality standard defines the maximum amount of a pollutant that can be present in outdoor air without harm to the public’s health. California law authorizes the ARB to set ambient (outdoor) air pollution standards (California Health & Safety Code section 39606) in consideration of public health, safety and welfare.” California Environmental Protection Agency, Air Resources Board, Website: *California Ambient Air Quality Standards, What is an ambient air quality standard?* Available online at <http://www.arb.ca.gov/research/aaqs/caaqs/caaqs.htm>. Accessed May 13, 2014.

IMPACT EVALUATION

Construction Air Quality Impacts

Project-related air quality impacts fall into two categories: short-term impacts due to construction and long-term impacts due to project operation. The following addresses the potential air quality impacts associated with project construction.

Impact AQ-1: The proposed project's construction activities would generate fugitive dust and criteria air pollutants, and would violate an air quality standard, contribute substantially to an existing or projected air quality violation, and result in a cumulatively considerable net increase in criteria air pollutants. (*Less than Significant with Mitigation*)

During the approximately 27-month construction period for the proposed project, demolition and construction activities would have the potential to result in emissions of ozone precursors and particulate matter, as discussed below.

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. 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. Reclaimed water must be used if required by Article 21, § 1100 et seq. of the San Francisco Public Works Code. If not required, reclaimed water should be used whenever possible. Contractors shall provide as much water as necessary to control dust (without creating run-off in any area of land clearing, and/or earth movement). 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 millimeter (0.01 inch) polyethylene plastic (or equivalent) tarp, braced down, or use other equivalent soil stabilization techniques.

For projects with sites of 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.

The site-specific Dust Control Plan requires the project sponsor to submit 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 haul trucks to the size of the truck bed and secure with a tarpaulin; enforce a 15-mile-per-hour 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 less than significant. No mitigation measures are necessary for fugitive dust.

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 4.E.4** on p. 4.E.24, 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 proposed 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 greenfield⁵⁸ sites without any form of mitigation measures taken into

⁵⁸ A greenfield site refers to agricultural or forest land or an undeveloped site earmarked for commercial, residential, or industrial projects.

consideration. In addition, the screening criteria do not account for project design features, attributes, or local development requirements that could also result in lower emissions.

Approximately 83,000 cubic yards of soil would be excavated and removed from the project site under the proposed project. As identified in the BAAQMD's *CEQA Air Quality Guidelines*, the size of proposed project (262 dwelling units) would be above the construction criteria air pollutant screening size for the "apartment, high-rise" land use type (e.g., high-rise residential [249 dwelling units]).⁵⁹ Thus, quantification of construction-related criteria air pollutant emissions is required. A detailed quantification of construction-related criteria air pollutant emissions was conducted for the proposed project because it exceeds the screening size and also because of the extensive material transport and haul truck activity related to the proposed excavation (i.e., greater than 10,000 cubic yards of material exported).⁶⁰ **Table 4.E.5: Estimated Average Daily Construction Emissions** summarizes the modeled construction-related emissions of each criteria air pollutant and precursor.

Table 4.E.5: Estimated Average Daily Construction Emissions

Average Daily Emissions	Projected Emissions (pounds per day) ¹			
	ROG	NO _x	PM ₁₀	PM _{2.5}
Proposed Project	5.07	61.83	2.92	2.35
Significance Threshold	54	54	82	54

Note:

¹ Emission factors were generated by CalEEMod model for San Francisco County.

Source: Aspen Environmental Group, August 2013

As shown in the table, the proposed project's construction-related emissions would be below the thresholds of significance for each criteria air pollutant except NO_x. Therefore, the proposed project would result in a significant impact related to air quality due to construction-related emissions of NO_x. Mitigation to reduce construction-related NO_x emissions has been identified and is detailed below as **Mitigation Measure M-AQ-1: Construction Emissions Minimization Plan**.

Mitigation Measure M-AQ-1: Construction Emissions Minimization Plan

Prior to issuance of a construction permit, the project sponsor shall submit a Construction Emissions Minimization Plan to the Environmental Review Officer for review and approval by and Environmental Planning Air Quality Specialist. The Plan shall detail compliance with the following requirements:

- All off-road construction diesel engines not registered under California Air Resources Board's Statewide Portable Equipment Registration Program, which have a rating of 50 horsepower or more and 750 horsepower or less, shall meet, at a

⁵⁹ BAAQMD, *CEQA Air Quality Guidelines*, May 2011, Table 3-1 - Criteria Air Pollutants and Precursors and GHG Screening Level Sizes, p. 3-2.

⁶⁰ Ibid, p. 3-5.

minimum, the Tier 3 California Emission Standards for Off-road Compression-Ignition Engines as specified in California Code of Regulations, Title 13, § 2423(b)(1). If a Tier 3 or Tier 3-equivalent engine is not available for a particular item of equipment, Tier 2- compliant engines shall be allowed on a case-by-case basis, as determined by the Planning Department.

- All equipment shall be turned off when not in use. Engine idling of all equipment shall be minimized.
- All equipment engines shall be maintained in good operating condition and in proper tune per manufacturers' specification.

As shown in **Table 4.E.6: Estimated Average Daily Construction Emissions with Mitigation**, with implementation of **Mitigation Measure M-AQ-1**, construction-related NO_x emissions would be reduced to a less-than-significant level. In addition, this mitigation measure would reduce construction emissions of ROG, PM₁₀, and PM_{2.5}, each of which would be less than significant without mitigation.

Table 4.E.6: Estimated Average Daily Construction Emissions with Mitigation

Average Daily Emissions	Projected Emissions (pounds per day) ¹			
	ROG	NO _x	PM ₁₀	PM _{2.5}
Proposed Project with Mitigation	3.68	48.04	1.95	1.46
Significance Threshold	54	54	82	54

Note:

¹ Emission factors were generated by CalEEMod model for San Francisco County.

Source: Aspen Environmental Group, August 2013

Impact AQ-2: The proposed project's construction activities would generate toxic air contaminants, including diesel particulate matter, but would not expose sensitive receptors to substantial pollutant concentrations. (*Less than Significant*)

The project site is not located within an identified air pollution hot spot.⁶¹ Although on-road heavy-duty diesel vehicles and off-road equipment would be used during the 27-month construction duration, emissions would be temporary and variable in nature and would not be expected to expose sensitive receptors to substantial air pollutants. Furthermore, the proposed project would be subject to, and would comply with, California regulations limiting idling to no more than five minutes, which would further reduce nearby sensitive receptors exposure to temporary and variable DPM emissions. Therefore, construction period TAC emissions would result in a less-than-significant impact to sensitive receptors. No mitigation measures are necessary.

⁶¹ City and County of San Francisco Planning Department, Map: Air Pollution Hot Spots, printed June 18, 2012. This document is available for review at the San Francisco Planning Department, 1650 Mission Street, Suite 400, in Case File No. 2005.0679E.

Operational Air Quality Impacts

Land use projects typically result in operational emissions of criteria air pollutants and TACs primarily from an increase in motor vehicle trips. However, land use projects may also result in criteria air pollutants and TACs from combustion of natural gas, landscape maintenance, use of consumer products, and architectural coating. The following addresses air quality impacts resulting from operation of the proposed project.

Impact AQ-3: 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, with 262 new dwelling units, would be below the operational criteria air pollutant screening size for the Apartment, high-rise land use type (510 dwelling units) identified in the BAAQMD's *CEQA Air Quality Guidelines*.⁶² Likewise, the 2,230-gsf café use and the 8,000-gsf fitness center addition would not exceed applicable operational criteria air pollutant screening sizes (47,000 sq. ft. and 128,000 sq. ft., respectively). Nevertheless, project-generated operational criteria air pollutant emissions were quantified; the results are provided in **Table 4.E.7: Estimated Daily and Annual Operation-Related Emissions**. As shown, operation of the proposed project would not exceed any significance thresholds for criteria air pollutants, and therefore would result in a less-than-significant impact with respect to criteria air pollutants. No mitigation measures are necessary.

⁶² BAAQMD, *CEQA Air Quality Guidelines*, May 2011, Table 3-1 - Criteria Air Pollutants and Precursors and GHG Screening Level Sizes, p. 3-2.

Table 4.E.7: Estimated Daily and Annual Operation-Related Emissions

	Daily Projected Emissions (pounds per day)			
	ROG	NO _x	PM ₁₀	PM _{2.5}
Project Area-Source Emissions	16.2	1.01	0.18	0.18
Project Mobile-Source (Vehicle) Emissions	10.35	8.1	4.5	1.3
Project Stationary Source Emissions	1.64	4.64	1.38	1.38
Total	28.19	13.75	6.06	2.85
Significance Threshold	54	54	82	54
	Annual Projected Emissions (tons per year)			
	ROG	NO _x	PM ₁₀	PM _{2.5}
Project Area-Source Emissions	2.89	0.38	0.02	0.02
Project Mobile-Source (Vehicle) Emissions	1.66	1.42	0.79	0.23
Project Stationary Source Emissions	0.30	0.85	0.25	0.25
Total	4.85	2.65	1.06	0.50
Significance Threshold	10	10	15	10

Notes: Neg: less than 0.005 tons/year

Source: Aspen Environmental Group, August 2013

Impact AQ-4: During project operations, the proposed project would generate toxic air contaminants, including diesel particulate matter, but would not expose sensitive receptors to substantial air pollutant concentrations. (*Less than Significant*)

Sources of Toxic Air Contaminants

Vehicle Trips

Any project that results in an increase in vehicle trips would also increase emissions of toxic air contaminants from vehicles. BAAQMD considers roads with less than 10,000 vehicle trips per day “minor, low-impact” sources that do not pose a significant health impact even in combination with other nearby sources and recommends that these sources be excluded from the environmental analysis. Using this point of reference, the proposed project’s 954 new daily vehicle trips would be well below 10,000 vehicle trips per day.⁶³ Therefore an assessment of project-generated TACs resulting from vehicle trips is not required, and the proposed project would not generate a substantial amount of TAC emissions that could affect nearby existing sensitive receptors.

⁶³ The air quality analysis for the proposed project used 954 new daily vehicle trips. Since that analysis was completed, the project sponsors slightly reduced the amount of square footage in the proposed café, resulting in a slight reduction in the number of new daily vehicle trips, to 942. Thus, the air quality analysis is somewhat conservative in analyzing about 12 more new daily vehicle trips, on average, than were analyzed in the Transportation Impact Study.

On-Site Diesel Generator

The proposed project would also include a back-up emergency generator. Emergency generators are regulated by BAAQMD through its New Source Review (Regulation 2, Rule 5) permitting process. The project applicant would be required to obtain applicable permits to operate an emergency generator from BAAQMD. Although emergency generators are intended only to be used in periods of power outages, monthly testing of the generator would be required. BAAQMD limits testing to no more than 50 hours per year. Additionally, as part of the permitting process, BAAQMD limits the excess cancer risk from any facility to no more than ten per one million population and requires any source that would result in an excess cancer risk greater than one per one million population to install Best Available Control Technology for Toxics (TBACT). Compliance with BAAQMD permitting process would ensure that project-generated TAC emissions would not expose nearby existing sensitive receptors to substantial air pollutant concentrations. Therefore, TAC emissions from the back-up emergency generator would be less than significant.

Siting New Sensitive Land Uses

The proposed project would include development of 262 residential units on the project site that is adjacent to existing sensitive land uses. Residential development is considered a sensitive land use for purposes of air quality evaluation. As discussed above, San Francisco, in partnership with BAAQMD, has modeled and assessed air pollutant impacts from mobile, stationary and area sources within the City. This assessment has resulted in the identification of air pollutant hot spots. The proposed project would site new sensitive land uses, but not within air pollution hot spots; therefore, the proposed project would result in a less-than-significant impact with respect to exposing new sensitive receptors to substantial levels of air pollution. No mitigation measures are necessary.

Impact AQ-5: The proposed project would not conflict with, or obstruct implementation of, the Bay Area 2010 Clean Air Plan. (*Less than Significant*)

The most recently adopted air quality plan for the SFBAAB is the *Bay Area 2010 Clean Air Plan (2010 CAP)*. The *2010 CAP* is a road map showing how the San Francisco Bay Area will achieve compliance with the state ozone standards as expeditiously as practicable and how the region will reduce transport of ozone and ozone precursors to neighboring air basins. In determining consistency with the *2010 CAP*, this analysis considers whether the project would (1) support the primary goals of the *2010 CAP*, (2) include applicable control measures from the *2010 CAP*, and (3) avoid disrupting or hindering implementation of control measures identified in the *2010 CAP*.

To meet the primary goals, the *2010 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 *2010 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 *2010 Clean Air Plan* 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 GHGs is discussed on pp. 70-86 in the Initial Study Section E.8, Greenhouse Gas Emissions (see **Appendix A** to this EIR), 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 ensure that residents could bicycle, walk, and ride transit to and from the project site instead of taking trips via private automobile (however, the hilly terrain in the area could limit the options of walking and bicycling for some). These options ensure that the proposed project would avoid substantial growth in automobile trips and vehicle miles traveled. The proposed project's anticipated 954 new vehicle trips would result in a negligible increase in air pollutant emissions. Transportation control measures that are identified in the *2010 CAP* are implemented by the *San Francisco General Plan* and the Planning Code, for example, through the City's bicycle parking requirements (Planning Code § 155), and transit impact development fees (Planning Code § 411) applicable to the proposed project, as well as the City's Transit First Policy (City Charter § 8A.155, embodied in the policies of the *General Plan* Transportation Element that articulates a set of objectives and policies giving priority to travel by transit, bicycle, and on foot over the private automobile). Compliance with these requirements would ensure the proposed project includes relevant transportation control measures specified in the *2010 CAP*.

A project that could cause the disruption or delay of *2010 CAP* control measures is one that would preclude the extension of a transit line or that proposes excessive parking beyond parking requirements. The proposed project would provide replacement parking spaces for each of the existing parking spaces on the project site and one new parking space for each of the 262 dwelling units of the proposed 1481 Post Street building as required by Planning Code § 151. It would not provide new parking spaces beyond parking requirements, and it would add ample bicycle parking. The proposed project would add residential, retail, and open space uses to a dense, walkable urban area near a concentration of local transit service. It 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 *2010 CAP*. The residents of the proposed project may, instead, experience improved access to transit from the

implementation of the Van Ness Bus Rapid Transit (BRT) and from the Geary BRT, if these foreseeable projects are approved and operational as planned.

For the reasons described above, the proposed project would not interfere with implementation of the 2010 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, this impact would be less than significant. No mitigation measures are necessary.

CUMULATIVE IMPACTS

Regional air quality impacts are by their very nature cumulative impacts. Emissions from past, present and future projects contribute to adverse regional air quality impacts on a cumulative basis. No single project by itself would be sufficient in size to result in nonattainment of ambient air quality standards. Instead, a project's individual emissions contribute to existing cumulative adverse air quality impacts.⁶⁴ As described above, the 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, if a project's emissions are below the project-level thresholds, the project would not be considered to result in a considerable contribution to cumulative regional air quality impacts.

Impact C-AQ-1: The proposed project in combination with past, present, and reasonably foreseeable future development in the project area would result in less-than-significant cumulative air quality impacts. (*Less than Significant*)

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.⁶⁵ The 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.

As shown in **Table 4.E.5**, the proposed project's construction-related emissions would be below the thresholds of significance for each criteria air pollutant except NO_x, which would exceed the thresholds and result in a significant impact. **Mitigation Measure M-AQ-1** has been identified

⁶⁴ BAAQMD, *Revised Draft Options and Justification Report, California Environmental Quality Act Thresholds of Significance*, October 2009, pp. 1, 27, and 37.

⁶⁵ BAAQMD, *Revised Draft Options and Justification Report, California Environmental Quality Act Thresholds of Significance*, October 2009, pp. 1, 27, and 37.

to reduce construction-related NO_x emissions. As show in **Table 4.E.6**, with implementation of Mitigation Measure M-AQ-1 construction-related NO_x emissions would be reduced below the NO_x threshold. Because the proposed project's construction (Impact AQ-1) emissions would not exceed the project-level thresholds for criteria air pollutants with implementation of Mitigation Measure M-AQ-1 and because the proposed project's 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.

Although the proposed project would add a new residential land use and new sources of TACs (e.g., new vehicle trips and/or stationary sources), the project site is not located within an air pollution hot spot. The project's incremental increase in localized TAC emissions resulting from the 954 new daily vehicle trips and new stationary sources (e.g., the emergency diesel generator and other natural gas-fired mechanical systems) would be minor and would not contribute substantially to cumulative TAC emissions that could affect nearby and proposed sensitive land uses. Therefore, cumulative air quality impacts would be considered less than significant.

F. WIND AND SHADOW

Section 4.F describes the proposed project's wind and shadow impacts.

WIND

This subsection describes the proposed project's impacts on ground-level wind currents at various locations on the project site and in the vicinity. The Environmental Setting discussion includes a general description of the wind environment in San Francisco and a discussion of regulations related to the review of wind impacts from proposed development projects. The Impacts discussion describes significance criteria for determining if wind impacts are significant under CEQA; existing wind conditions on the project site; the wind impacts of the proposed project and cumulative development projects; and improvement measures. The discussion of wind impacts in this subsection is derived from the *Pedestrian Wind Study* prepared by Rowan Williams Davies & Irwin, Inc. (RWDI).¹

ENVIRONMENTAL SETTING

EXISTING CLIMATE AND WIND CONDITIONS

The difference in atmospheric pressure between two points on the earth causes air masses to move from the area of higher pressure to the area of lower pressure. This movement of air masses results in wind currents. Meteorological data from the United States Weather Bureau and the Bay Area Air Quality Management District show that winds from the northwest, west-northwest, west, and west-southwest are the most prevalent in San Francisco and reflect the persistence of sea breezes. Wind direction is most variable during the winter, when strong southerly winds, which are frequent during the approach of a winter storm, occur. Average wind speeds are highest during the summer and lowest during the winter. Typically, the highest wind speeds occur during the mid-afternoon, and the lowest wind speeds occur during the early morning.

Existing wind speeds within publically accessible pedestrian areas surrounding the project site are sufficient to affect pedestrian comfort, particularly during the summer afternoons. As discussed in more detail below on p. 4.F.7, wind modeling of existing conditions indicates that 30 of the 54 measured test point locations around the project site and vicinity currently exceed the pedestrian

¹ Rowan Williams Davies & Irwin, Inc. (RWDI), *1481 Post Street Pedestrian Wind Conditions Consultation*, September 17, 2013 (hereinafter referred to as "*Pedestrian Wind Study*"). A copy of this document is available for review at the San Francisco Planning Department, 1650 Mission Street, Suite 400, as part of Case File No. 2005.0679E.

comfort criterion of 11 mph more than 10% of the time, as established by § 148 of the San Francisco Planning Code, while 24 of the 54 test locations comply with the comfort criteria. The average equivalent wind speed for the wind comfort analysis at the 54 test locations is approximately 12.2 mph, with wind speeds ranging from 8 to 21 mph. The highest wind speed occurs along the north side of Starr King Way at the rear of the First Unitarian Universalist Church (Test Point 44), approximately one-half block southeast of the project site. Under existing conditions, all 54 test locations comply with the wind hazard criterion by not exceeding 26 mph for more than one hour per year, as established by Planning Code § 148.

BUILDINGS AND WIND SPEED

The direction and speed of wind currents can be altered by natural features of the land or by buildings and structures. Groups of buildings clustered together tend to act as obstacles that reduce wind speeds; the heights, massing, and orientations or profiles of the buildings are some of the factors that can affect wind speeds.

When a building is much taller than those around it, rather than a similar height, it can intercept and redirect winds downward that might otherwise flow overhead. The winds can be directed down the vertical face of the building to ground level, and these redirected winds can be relatively strong and relatively turbulent.

The massing of a building can affect wind speeds. In general, slab-shaped buildings have the greatest potential to accelerate ground-level winds, while buildings that have unusual shapes or are more geometrically complex tend to have lesser effects.

The orientation or profile of a building is another factor that can affect wind speeds. When the wide face of a building, as opposed to its narrow face, is oriented toward the prevailing wind direction, the building has more surface area to intercept and redirect winds down to ground level, thus increasing the probability of strong and turbulent winds at ground level.

WIND SPEED AND PEDESTRIAN COMFORT

The comfort of pedestrians varies under different conditions of sun exposure, temperature, clothing, and wind speed. Winds up to 4 mph have no noticeable effect on pedestrian comfort. With winds from 4 to 8 mph, wind is felt on the face. Winds from 8 to 13 mph will disturb hair, cause clothing to flap, and extend a light flag mounted on a pole. Winds from 13 to 19 mph will raise loose paper, dust, and dry soil, and will disarrange hair. With winds from 19 to 26 mph, the force of the wind will be felt on the body. With 26- to 34-mph winds, umbrellas are used with difficulty, hair is blown straight, walking steadily is difficult, and wind noise is unpleasant. Winds over 34 mph increase difficulty with balance, and gusts can be hazardous and can blow people over.

REGULATORY FRAMEWORK

The project site is not in a zoning district that is subject to the provisions of Planning Code § 148 or any other Planning Code sections that include provisions related to ground-level wind currents (i.e., the required project approvals do not include exceptions from the wind comfort criteria established in § 148). However, for the purposes of CEQA, the wind hazard criterion established in § 148 is used to determine whether the proposed project would alter wind in a manner that substantially affects public areas, resulting in a significant wind impact (see “Significance Criteria,” discussed below).

Section 148 establishes wind comfort and wind hazard criteria for the Downtown (C-3) Districts. Section 148 establishes equivalent wind speeds² of 7 mph as the comfort criterion for seating areas and 11 mph as the comfort criterion for areas of substantial pedestrian use. Section 148 also establishes a wind hazard criterion of an equivalent wind speed of 26 mph. The wind comfort and wind hazard criteria for zoning districts elsewhere in San Francisco (the Downtown Residential (DTR) Districts, the Folsom and Main Residential/Commercial Special Use District, the Van Ness Special Use District, and certain zoning districts in the South of Market neighborhood) are the same as those established for the C-3 Districts by § 148 (see also § 243, § 249.1 and § 263.11). The wind comfort criteria are not used to determine whether the proposed project would result in a significant wind impact.

The Planning Code seating comfort criterion of 7 mph and the pedestrian comfort criterion of 11 mph are based on wind speeds measured and averaged over a period of one minute. In contrast, the Planning Code wind hazard criterion of 26 mph is defined by a wind speed that is measured and averaged over a period of one hour. When stated on the same time basis as the comfort criteria wind speeds, the hazard criterion wind speed (26 mph averaged over one hour) is equivalent to a one-minute average of 36 mph. The test results presented in the wind tunnel report for the proposed project and in this section of the EIR use the one-minute average of 36 mph for the hazard criterion.

IMPACTS

SIGNIFICANCE CRITERIA

The threshold for determining the significance of impacts in this analysis is consistent with the environmental checklist in Appendix G of the State *CEQA Guidelines*, which has been adopted and modified by the San Francisco Planning Department. For the purpose of this analysis, the

² Pursuant to Planning Code § 148, equivalent wind speed is defined as the mean hourly wind speed adjusted to incorporate the effects of gustiness or turbulence on pedestrians.

following applicable threshold was used to determine whether implementing the project would result in a significant wind impact. Implementation of the proposed project would have a significant wind effect if the project would:

- Alter wind in a manner that substantially affects public areas.

APPROACH TO ANALYSIS

At a height of 398 feet (416 feet including an 18-foot-tall mechanical penthouse), the proposed project would be substantially taller than existing nearby buildings and has the potential to intercept winds that might otherwise flow overhead. These winds can be redirected down the vertical face of the building and alter ground-level wind conditions around the project site. For these reasons, the proposed project is required to undergo wind tunnel testing. Any proposed development project in San Francisco that requires a wind tunnel analysis must follow the standard methodology established by the Planning Department. Under the standard methodology, the wind tunnel analysis relies on wind data collected from the United States Weather Bureau weather station atop the Federal Building at 50 United Nations Plaza. Wind data from 7:00 a.m. to 6:00 p.m. are used, because this time period represents peak pedestrian activity in an urban setting. RWDI conducted a wind tunnel test of the proposed project using a 1:400 (1 inch = 33 feet) scale model of the proposed project and surrounding buildings within a 1,500-foot radius³ of the project site. The scale model, which was equipped with permanently mounted wind speed sensors, was placed inside an atmospheric boundary layer wind tunnel. Using four wind directions (northwest, west-northwest, west, and west-southwest), wind tunnel tests were then conducted for the project site and vicinity using the following three different scenarios:

1. Existing Conditions Configuration: This configuration consists of the existing structures on the project site and the existing surrounding buildings.⁴
2. Existing Conditions Plus Proposed Project Configuration: This configuration consists of the proposed project and the existing surrounding buildings.⁵
3. Proposed Project Plus Cumulative Configuration: For this configuration, which includes the proposed project and the existing surrounding buildings, a 1,500-foot radius was established around the project site. This area was reviewed for other development projects that have been proposed, approved, or are under construction and are close enough to the project site that they could interact with the proposed project and alter ground-level wind conditions on and near the project site. The only project meeting these

³ The American Society of Civil Engineers has established a minimum standard of an 820-foot radius for wind tunnel testing. RWDI uses a 1,500-foot radius, because that is the largest radius that can be covered by the scale model that would fit into the wind tunnel. In addition, buildings that are more than 1,500 feet from a project site would have little to no effects on winds on and around the project site in a densely developed urban environment such as San Francisco.

⁴ RWDI, Pedestrian Wind Study, Figure 1a.

⁵ RWDI, Pedestrian Wind Study, Figure 1f.

parameters is the approved project at 1101 Van Ness Avenue / 1255 Post Street (the Cathedral Hill campus of the California Pacific Medical Center).⁶

The number and locations of the wind study test points were selected by the wind consultant and the Planning Department based on the presence of public areas on and around the project site and how the proposed project could affect pedestrian-level wind patterns throughout the project vicinity. The locations of the test points are shown in **Figure 4.F.1: Locations of Wind Study Test Points**.

The relevant CEQA significance criterion for wind impacts is presented above on pp. 4.F.3-4.F.4. A project would be considered to have a significant impact related to the topic of wind if the project were to “alter wind in a manner that substantially affects public areas” (i.e., cause winds to exceed the wind hazard criterion of 26 mph for more than one hour per year). Private open spaces on adjacent or nearby properties that are only accessible to the tenants of those properties are not considered public areas. For these reasons, no discussion of the proposed project’s wind impacts on the private open spaces on adjacent or nearby properties is required under CEQA in this EIR. City decision-makers may consider the proposed project’s wind impacts on private open spaces as a separate matter in the context of the project’s approval process.

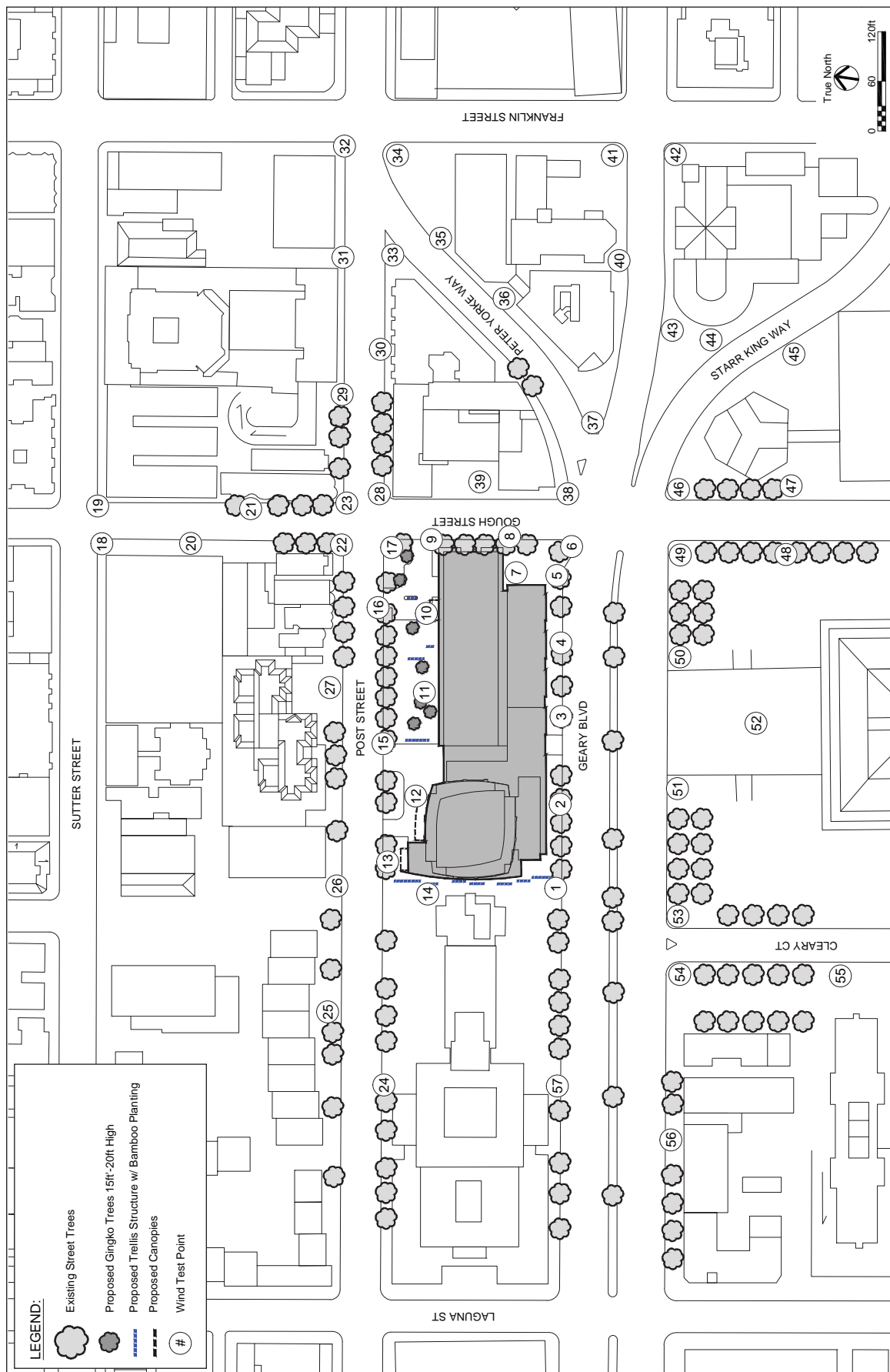
PROJECT FEATURES

The proposed project consists of the construction of a new 36-story, 398-foot-tall (416 feet tall including an 18-foot-tall mechanical penthouse) residential high-rise tower, and it includes a request to reclassify the height limit for the project site from 240 feet to 410 feet. The proposed project has the potential to affect ground-level wind conditions around and near the project site.

Building height, setbacks, façade articulation, and architectural features (canopies and marquees) all play a role in affecting ground-level wind currents. The proposed project consists of a podium element surmounted by a vertical tower element. Some of the winds that would be intercepted by the tower and redirected downward would land on the roof of the podium instead of the sidewalk along Post Street or Geary Boulevard. The proposed project includes canopies over building entrances and windscreens upwind of open space areas on the project site; these design features would help slow or redirect ground-level winds.

The proposed project includes three “site plan” variants, as described in Chapter 2, Project Description, on pp. 2.30-2.34. The height and bulk/massing of the variants would be the same as those of the proposed project, so wind impacts of the variants would be the same as those of the proposed project. No separate analysis of the project variants is necessary under the topic of wind.

⁶ RWDI, Pedestrian Wind Study, Figure 1g.



SOURCE: RWDI

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FIGURE 4.F.1: LOCATIONS OF WIND STUDY TEST POINTS

IMPACT EVALUATION

Impact WS-1: The proposed project would not alter wind in a manner that substantially affects public areas. (*Less than Significant*)

Wind Comfort Analysis for the Proposed Project

Wind speeds were measured at 54 ground-level test locations for the Existing Conditions Configuration and at 57 ground-level test locations for the Existing Conditions Plus Proposed Project Configuration. Three test locations (Test Points 10, 11, and 12) are occupied by the existing parking garage at 1333 Gough Street, so only 54 locations were tested under the Existing Conditions Configuration. The parking garage would be demolished as part of the proposed project. Under the Existing Conditions Plus Proposed Project Configuration and the Proposed Project Plus Cumulative Configuration, Test Points 10, 11, and 12 were added to account for the removal of the parking garage. The locations of the test points are shown in **Figure 4.F.1** on p. 4.F.6, and the test results are shown in **Table B.1: Wind Comfort Analysis**, in EIR **Appendix B, Wind Study Tables**.

Under existing conditions, the average equivalent wind speed for the wind comfort analysis at the 54 test locations is approximately 12.2 mph, with wind speeds ranging from 8 to 21 mph. The highest wind speed occurs along the north side of Starr King Way at the rear of the First Unitarian Universalist Church (Test Point 44), approximately one-half block southeast of the project site.

With implementation of the proposed project, the average equivalent wind speed for the wind comfort analysis at the 57 test locations would remain at 12.2 mph, the same as under existing conditions. Wind speeds would range from 8 to 20 mph, and the highest wind speed would continue to occur along the north side of Starr King Way at the rear of the First Unitarian Universalist Church (Test Point 44). Wind speeds would decrease at 20 locations, remain the same at 18 locations, and increase at 19 locations.

When compared to existing conditions, implementation of the proposed project would change wind patterns such that 7 existing wind comfort exceedances (Test Points 13, 14, 17, 24, 29, 40, and 42) would be eliminated and 7 new exceedances (Test Points 4, 6, 11, 12, 21, 51 and 53) would be created, resulting in a net change of zero new exceedances.

At the 7 locations where existing exceedances would be eliminated, wind speeds would decrease between 1 and 4 mph. The greatest decrease in wind speed would be 4 mph near the entrance of the proposed café at the northwest corner of the proposed tower (Test Points 13 and 14).

At the 7 locations where new exceedances of the comfort criterion would be created, wind speeds would increase between 1 and 17 mph. The greatest increase in wind speed would be 17 mph in

the proposed open space on the north side of the existing 1333 Gough Street building (Test Point 11). The wind speed near the residential entrance at the northeast corner of the proposed tower (Test Point 12) would increase by 14 mph. Both of these test points are in locations that are currently occupied by the existing parking garage at 1333 Gough Street. The wind speeds at Test Point 4 (the sidewalk on the north side of Geary Boulevard between Laguna and Gough streets), Test Point 21 (the sidewalk on the east side of Gough Street between Sutter and Post streets), and Test Points 51 and 53 (the sidewalk on the south side of Geary Boulevard near Cleary Court) would increase by 1 mph. The wind speed at Test Point 6 (the sidewalk at the northwest corner of Geary Boulevard and Gough Street) would increase by 2 mph. The change in wind speed at these five sidewalk locations would be nearly imperceptible to pedestrians.

In conclusion, implementation of the proposed project would not result in substantial changes to wind conditions in the project vicinity. The average equivalent wind speed would remain at 12.2 mph, and the number of locations that would exceed the comfort criteria would remain at 30. Exceeding the pedestrian comfort criterion is not a significant wind impact under CEQA. Although there would be localized changes throughout the project vicinity, the overall wind conditions would remain substantially the same with implementation of the proposed project. Therefore, pedestrian activity throughout the project vicinity would not be adversely affected by changes to wind conditions associated with implementation of the proposed project.

While the proposed project would not have a significant impact on ground-level wind conditions, **Improvement Measure I-WS-A**, shown below, was identified to lessen the proposed project's less-than-significant effect on ground-level wind conditions. City decision-makers may choose to include this improvement measure as a condition of approval for the proposed project.

Improvement Measure I-WS-A: Wind Reduction Measures

As an improvement measure to reduce ground-level wind speeds in areas of substantial pedestrian activity and/or areas that are used for public seating, the project sponsor should strive to install, or cause to be installed, wind reduction measures that could include hedges, planter boxes, trees, trellises, and/or windscreens on the project site.

Wind Hazard Analysis for the Proposed Project

Wind speeds were measured at 54 ground-level test locations for the Existing Conditions Configuration and at 57 ground-level test locations for the Existing Conditions Plus Proposed Project Configuration. The locations of the test points are shown in **Figure 4.F.1** on p. 4.F.6, and the test results are shown in **Table B.2: Wind Hazard Analysis**, in EIR **Appendix B, Wind Study Tables**. As discussed on p. 4.F.3, the test results presented in **Table B.2** use the one-minute average of 36 mph for the wind hazard criterion.

Under existing conditions, all 54 test locations comply with the wind hazard criterion by not exceeding 26 mph for more than one hour per year. With implementation of the proposed project, all 57 test points would comply with the wind hazard criterion. There would be no exceedances of the wind hazard criterion at ground level. As under existing conditions, wind speeds on the south side of Geary Boulevard could approach but would not exceed the wind hazard criterion; therefore, pedestrians would not be expected to notice a change in the wind conditions along this sidewalk. For these reasons, the proposed project would not have a significant wind impact, and no mitigation measures are necessary.

Impact C-WS-1: The proposed project in combination with past, present, and reasonably foreseeable future projects in the project vicinity would not make a cumulatively considerable contribution to a significant cumulative wind impact. (*Less than Significant*)

As discussed under “Approach to Analysis,” on pp. 4.F.4-4.F.5, there is one reasonably foreseeable future project, the proposed Cathedral Hill medical campus of the California Pacific Medical Center at 1101 Van Ness Avenue / 1255 Post Street, close enough to the project site (within 1,500 feet) that could interact with the proposed project to alter ground-level wind conditions on and near the project site. The other reasonably foreseeable future projects discussed in **Section 4.A, Introduction** [to Environmental Setting, Impacts, and Mitigation], pp. 4.A.6-4.A.7, are too far from the project site (more than 1,500 feet) to interact with the proposed project. For these reasons, the project at 1101 Van Ness Avenue / 1255 Post Street was included in the cumulative scenario during wind tunnel testing, but the other projects were not. The results of the wind tunnel testing for the cumulative scenario are summarized below.

Wind Comfort Analysis for the Cumulative Scenario

Wind speeds were measured at 54 ground-level test locations for the Existing Conditions Configuration and at 57 ground-level test locations for the Proposed Project Plus Cumulative Configuration. The locations of the test points are shown in **Figure 4.F.1**, on p. 4.F.6, and the test results are shown in **Table B.1**, in EIR **Appendix B, Wind Study Tables**.

Under existing conditions, the average equivalent wind speed for the wind comfort analysis at the 54 test locations is approximately 12.2 mph, with wind speeds ranging from 8 to 21 mph. The highest wind speed occurs along the north side of Starr King Way at the rear of the First Unitarian Universalist Church (Test Point 44), approximately one-half block southeast of the project site.

With implementation of the proposed project and past, present, and reasonably foreseeable future projects, the average equivalent wind speed for the wind comfort analysis at the 57 test locations would remain at 12.2 mph. Wind speeds would range from 8 to 20 mph, and the highest wind speed of 20 mph would continue to occur along the north side of Starr King Way at the rear of the

First Unitarian Universalist Church (Test Point 44). Wind speeds would decrease at 19 locations, remain the same at 17 locations, and increase at 21 locations.

When compared to existing conditions, implementation of the proposed project, in combination with past, present, and reasonably foreseeable future projects, would change wind patterns such that 5 existing wind comfort exceedances (Test Points 13, 14, 17, 24, and 40) would be eliminated and 7 new exceedances (Test Points 6, 11, 12, 21, 41, 51, and 53) would be created, resulting in a net change of 2 new exceedances.

At the 5 locations where existing exceedances of the comfort criterion would be eliminated, wind speeds would decrease between 1 and 4 mph. The greatest decrease in wind speed would be 4 mph near the entrance of the proposed café at the northwest corner of the proposed tower and near the northeast corner of the existing health center facility at The Sequoias (Test Point 14).

At the 7 locations where new exceedances would be created, wind speeds would increase between 1 and 17 mph. The greatest increase in wind speed would be 17 mph in the proposed open space on the north side of the existing 1333 Gough Street building (Test Point 11). This area is currently occupied by the existing parking garage at 1333 Gough Street. The wind speed near the residential entrance at the northeast corner of the proposed tower (Test Point 12) would increase by 13 mph. Both of these test points are in locations that are currently occupied by the existing parking garage at 1333 Gough Street. The wind speeds at Test Point 21 (the sidewalk on the east side of Gough Street between Sutter and Post streets) and Test Points 51 and 53 (the sidewalk on the south side of Geary Boulevard near Cleary Court) would increase by 1 mph, and the wind speed at Test Point 6 (the sidewalk at the northwest corner of Geary Boulevard and Gough Street) would increase by 2 mph. The change in wind speed at these four sidewalk locations would be nearly imperceptible to pedestrians. The wind speed at Test Point 41 (the sidewalk at the northwest corner of Geary Boulevard at Franklin Street) would increase by 3 mph.

In conclusion, implementation of the proposed project, in combination with past, present, and reasonably foreseeable future projects, would not result in substantial changes to wind conditions in the project vicinity. The average equivalent wind speed would remain at 12.2 mph, and the number of locations that would exceed the comfort criteria would increase from 30 to 32. Exceeding the seating comfort criterion or the pedestrian comfort criterion is not a significant wind impact under CEQA. Although there would be localized changes throughout the project vicinity, the overall wind conditions would remain substantially the same with implementation of the proposed project and past, present, and reasonably foreseeable future projects. Therefore, pedestrian activity throughout the project vicinity would not be adversely affected by changes to wind conditions associated with implementation of the proposed project.

As discussed on p. 4.F.8, **Improvement Measure I-WS-A** could be implemented upwind of and/or around locations with wind comfort exceedances in order to make wind conditions at those locations more comfortable for pedestrians or seated individuals.

Wind Hazard Analysis for the Cumulative Scenario

Wind speeds were measured at 54 ground-level test locations for the Existing Conditions Configuration and at 57 ground-level test locations for the Proposed Project Plus Cumulative Configuration. The locations of the test points are shown in **Figure 4.F.1**, on p. 4.F.6, and the test results are shown in **Table B.2**, in EIR **Appendix B, Wind Study Tables**. As discussed on p. 4.F.3, the test results presented in Table B.2 use the one-minute average of 36 mph for the wind hazard criterion.

Under existing conditions, all 54 test locations comply with the wind hazard criterion by not exceeding 26 mph for more than one hour per year. With implementation of the proposed project and past, present, and reasonably foreseeable future projects, all 57 test points would comply with the wind hazard criterion. There would be no exceedances of the wind hazard criterion at ground level. As under existing conditions, wind speeds on the south side of Geary Boulevard could approach but would not exceed the wind hazard criterion; therefore, pedestrians would not be expected to notice a change in the wind conditions along this sidewalk. The proposed project, in combination with past, present, and reasonably foreseeable future projects, would not have a significant cumulative wind impact. The proposed project would not make a cumulatively considerable contribution to a significant cumulative wind impact, and no mitigation measures are necessary.

SHADOW

This subsection of the EIR discusses the shadow impacts of the proposed project on open spaces and recreation facilities in the vicinity of the project site. The Environmental Setting discussion identifies existing public and private open spaces and recreation facilities, describes applicable regulations related to shadow impacts, and describes existing shadows on existing public and private open spaces and recreation facilities. The Impacts discussion describes whether the proposed project would shadow parks and open spaces in such a manner as to reduce the use and enjoyment of those spaces, which is the significance criterion for determining whether shadow impacts are significant under CEQA. Cumulative effects of the proposed project, combined with past, present, and reasonably foreseeable future projects, are discussed. Background materials supporting the discussion of shadow impacts consist of shadow calculations and shadow diagrams that were prepared by CADP Associates (CADP).⁷

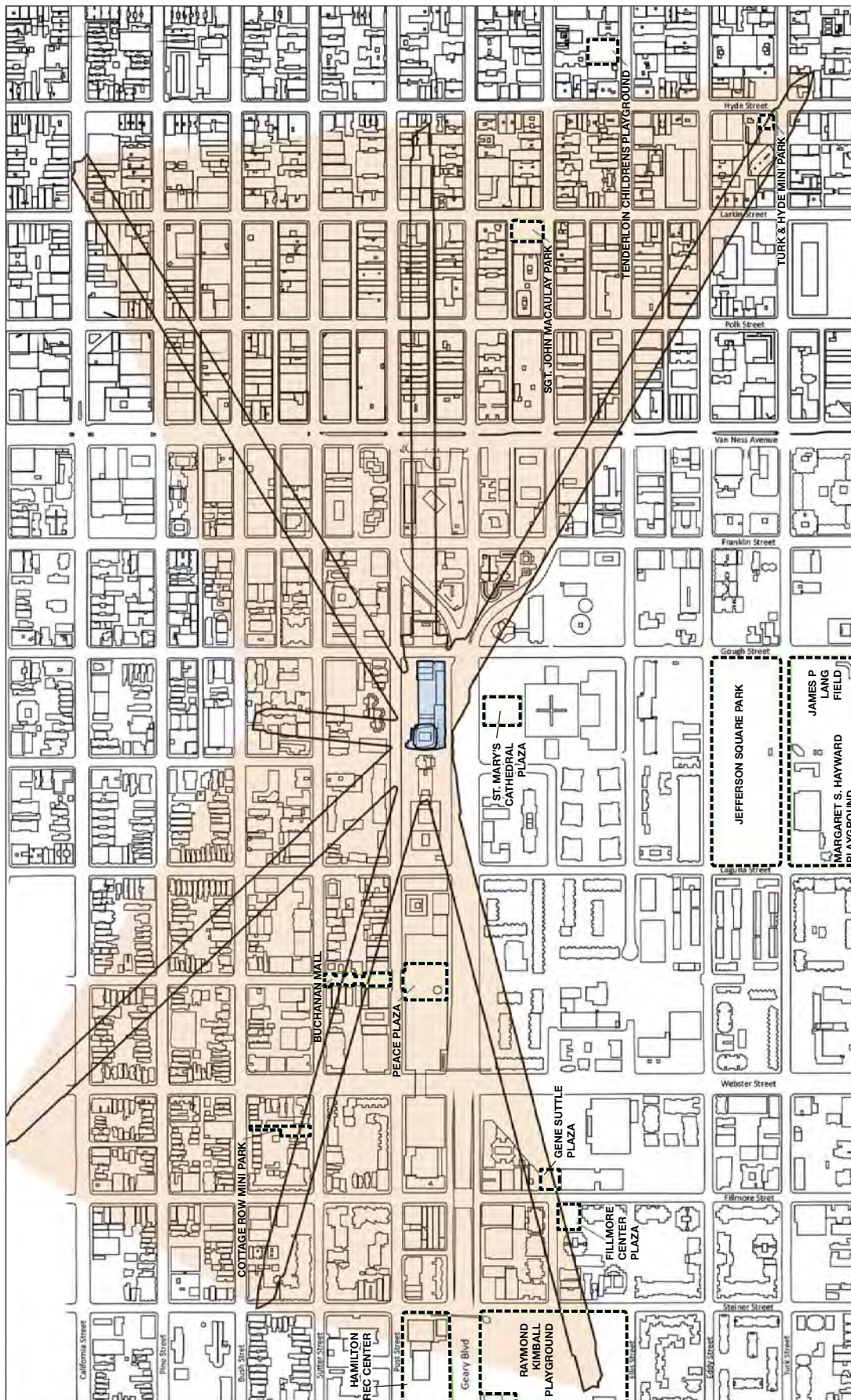
ENVIRONMENTAL SETTING

EXISTING PUBLICLY ACCESSIBLE OPEN SPACES

There are nine publicly accessible open spaces (Peace Plaza, the Hamilton Recreation Center, Raymond Kimbell Playground, Cottage Row Mini-Park, Sergeant John Macaulay Park, Turk-Hyde Mini Park, Buchanan Mall, Gene Suttle Plaza, and Fillmore Center Plaza) that are potentially within reach of the proposed project's shadow (see **Figure 4.F.2: Existing Publicly Accessible Open Spaces within Reach of the Proposed Project's Shadow**).⁸ Figure 4.F.2 shows the maximum reach of project shadow throughout the day and year, the nearby publicly accessible open spaces that are within reach of the proposed project's shadow (inside the shadow fan), and those that are not within reach of the proposed project's shadow (outside of the shadow fan). Some of the open spaces mentioned above are under the jurisdiction of the Recreation and Park Commission and are subject to the provisions of the Sunlight Ordinance, as articulated in Planning Code § 295. This Planning Code regulation is discussed under "Regulatory Framework" on pp. 4.F.26-4.F.27. The other open spaces are either under the jurisdiction of other government agencies or are privately owned.

⁷ CADP, Shadow Calculations and Diagrams, September 2013. The shadow calculations and diagrams are available for review at the Planning Department, 1650 Mission Street, Suite 400, San Francisco, California, as part of Case File No. 2005.0679E.

⁸ This determination was made based on the Planning Department's shadow fan, which is discussed in more detail under "Approach to Analysis" on p. 4.F.28.



SOURCE: CADP Associates

NOTE: The shaded area represents the extent of the proposed project's shadow.
Parks that are within the shaded area are within reach of the proposed project's shadow.



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**FIGURE 4.F.2: EXISTING PUBLICLY ACCESSIBLE
OPEN SPACES WITHIN REACH OF
THE PROPOSED PROJECT'S SHADOW**

Recreation and Park Commission Properties

Peace Plaza

Peace Plaza is an approximately 0.7-acre mid-block open space within the Japan Center commercial complex in the Western Addition neighborhood. The plaza is bounded by Post Street on the north, the Japan Center East Mall on the east, Geary Boulevard on the south, and the Japan Center West Mall on the west. Post Street is at a higher elevation than Geary Boulevard. As a result of this difference in elevation, the north entrance to Peace Plaza is at the same level as Post Street, but the south entrance to Peace Plaza is about eight feet above the sidewalk on Geary Boulevard. A set of stairs and a wheelchair ramp provide pedestrian access from Geary Boulevard to Peace Plaza. In addition, pedestrians can access Peace Plaza from the East Mall and the West Mall through doors that open onto the plaza.

Peace Plaza is largely paved in stone, but the eastern and western perimeters of the plaza are landscaped with trees and small shrubs. The approximately 80-foot-tall Peace Pagoda stands in the southwest corner of the plaza, and there is a water feature and some seating around the base of the pagoda. A wall, ranging in height from five feet to nine feet, runs along the southern perimeter of the plaza. There is an opening in the wall that connects to the stairs and wheelchair ramp that provide pedestrian access to the plaza from Geary Boulevard. Seating areas are concentrated in the northern and eastern portions of the plaza, leaving the central portion of the plaza open and free from visual clutter. Peace Plaza is primarily used for passive recreation, such as sitting and strolling, as a pedestrian connector between Post Street and Geary Boulevard and between the East Mall and the West Mall, and as a venue for community events, such as the Northern California Cherry Blossom Festival. The plaza is open from sunrise until sunset seven days a week.

Throughout the year, Peace Plaza is shadowed by existing buildings in the early morning and late afternoon. Some of the shadows throughout the day are cast by the existing 80-foot-tall Peace Pagoda in the southwest corner of the plaza. During the spring, summer, and autumn, the morning shadows begin at sunrise and recede as the day progresses, moving off the plaza shortly after 9:00 a.m. The afternoon shadows begin at approximately 3:30 p.m. and remain until the end of the day (see **Figure 4.F.3: Existing and Project Shadow at 10:00 a.m. and Noon Pacific Daylight Time (PDT) on March 23 (September 20)**, **Figure 4.F.4: Existing and Project Shadow at 3:00 p.m. PDT on March 23 (September 20)**, **Figure 4.F.5: Existing and Project Shadow at 10:00 a.m. and Noon PDT on June 21**, and **Figure 4.F.6: Existing and Project**

Shadow at 3:00 p.m. PDT on June 21, on pp. 4.F.16-4.F.19).⁹ During the winter, the morning shadows begin at sunrise and recede as the day progresses, moving off the plaza at approximately 10:00 a.m. The afternoon shadows begin at approximately 2:00 p.m. and remain until the end of the day (see **Figure 4.F.7: Existing and Project Shadow at 10:00 a.m. and Noon Pacific Standard Time (PST) on December 20**, and **Figure 4.F.8: Existing and Project Shadow at 3:00 p.m. PST on December 20**, on pp. 4.F.20-4.F.21).

Hamilton Recreation Center

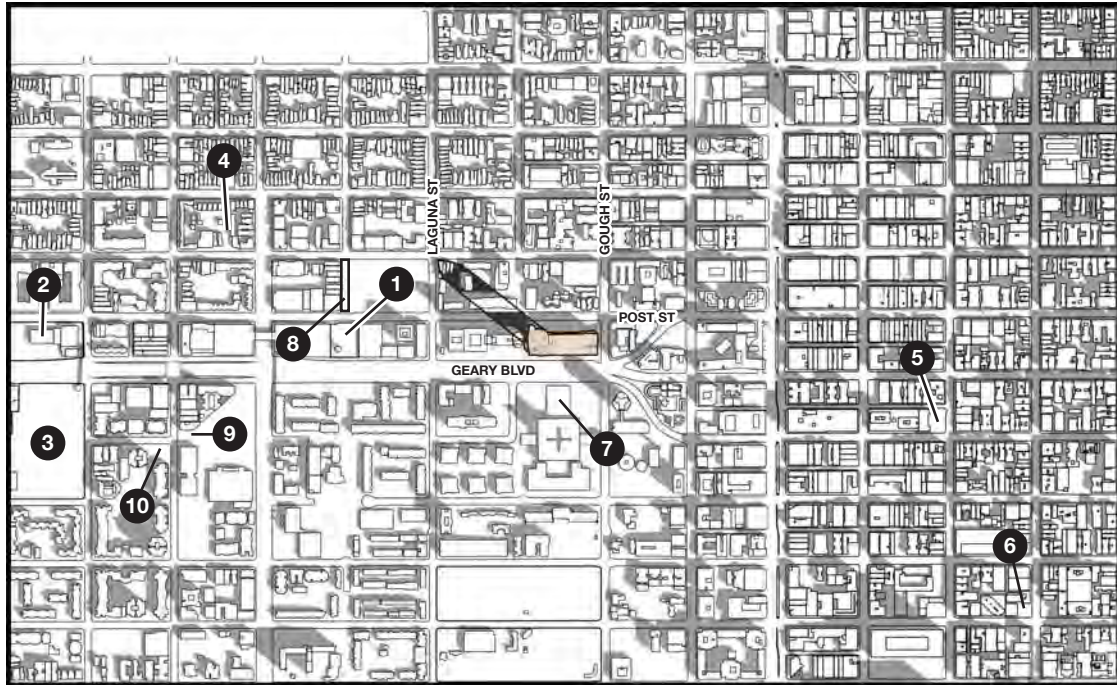
The Hamilton Recreation Center, which is bounded by Geary Boulevard on the south, the Western Addition Library on the west, Post Street on the north, and Steiner Street on the east, is an approximately 4.1-acre indoor/outdoor recreation facility in the Western Addition neighborhood. The facility includes an athletic field, two playgrounds, two outdoor tennis courts, one outdoor basketball court, and an indoor swimming pool. There is a gymnasium/recreation building at the east end of the property. The Hamilton Recreation Center is open five days a week (9:00 a.m. to 9:00 p.m. Tuesday through Friday, 9:00 a.m. to 5:00 p.m. Saturday, closed Sunday and Monday).

Throughout the year, the outdoor recreation facilities at the Hamilton Recreation Center are shadowed by existing buildings in the early morning and in the late afternoon. Some of the early-morning shadows are cast by the existing gymnasium/recreation building at the east end of the property. The morning shadows begin at sunrise and recede as the day progresses, moving off the outdoor recreation facilities at approximately 9:30 a.m. The afternoon shadows begin at approximately 3:00 p.m. and remain until the end of the day (see **Figures 4.F.3 through 4.F.8**, on pp. 4.F.16-4.F.21).

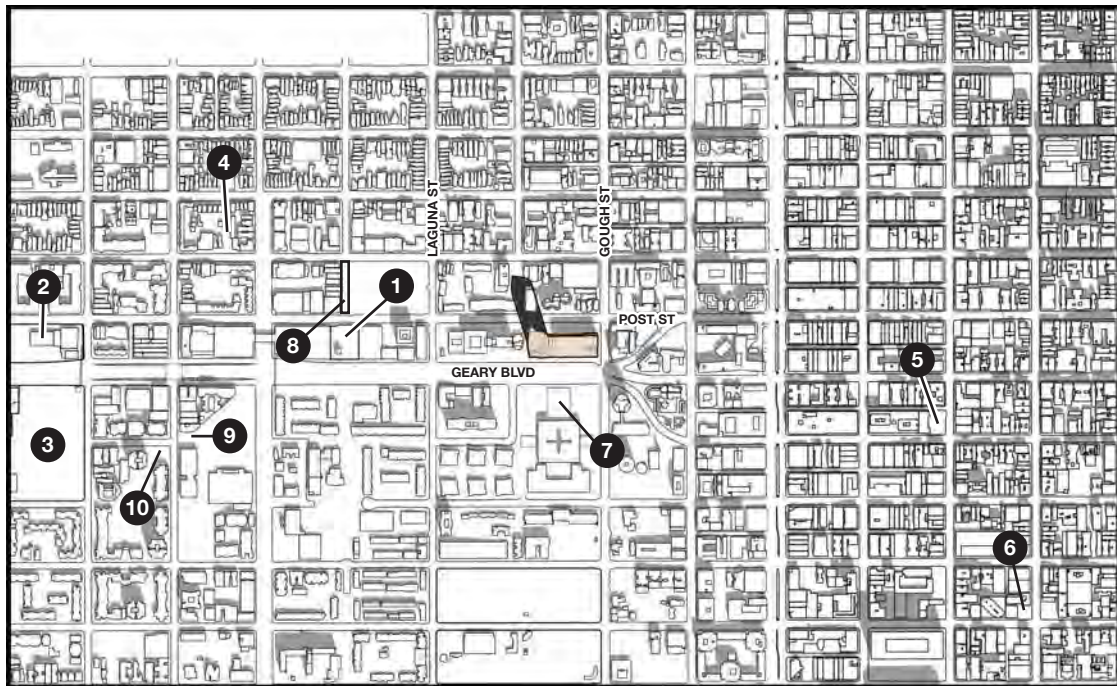
Raymond Kimbell Playground

Raymond Kimbell Playground, on the southwest corner of Geary Boulevard and Steiner Street, is an approximately 6.2-acre outdoor recreation facility in the Western Addition neighborhood. The facility is bounded by Geary Boulevard on the north, Steiner Street on the east, Ellis Street on the south, and Pierce Street and Benjamin Franklin Middle School on the west. The northern third of the park consists of an oval-shaped grass area surrounded by a paved pedestrian path. The southern two-thirds of the park consists of one soccer field, three baseball fields, a clubhouse, and a children's play area. The park is open from sunrise until sunset seven days a week.

⁹ The times of day and the days of the year shown in the figures are representative samples of each season and are not the only times of day or days of the year when existing or net new project shadow would occur.



10:00 A.M.



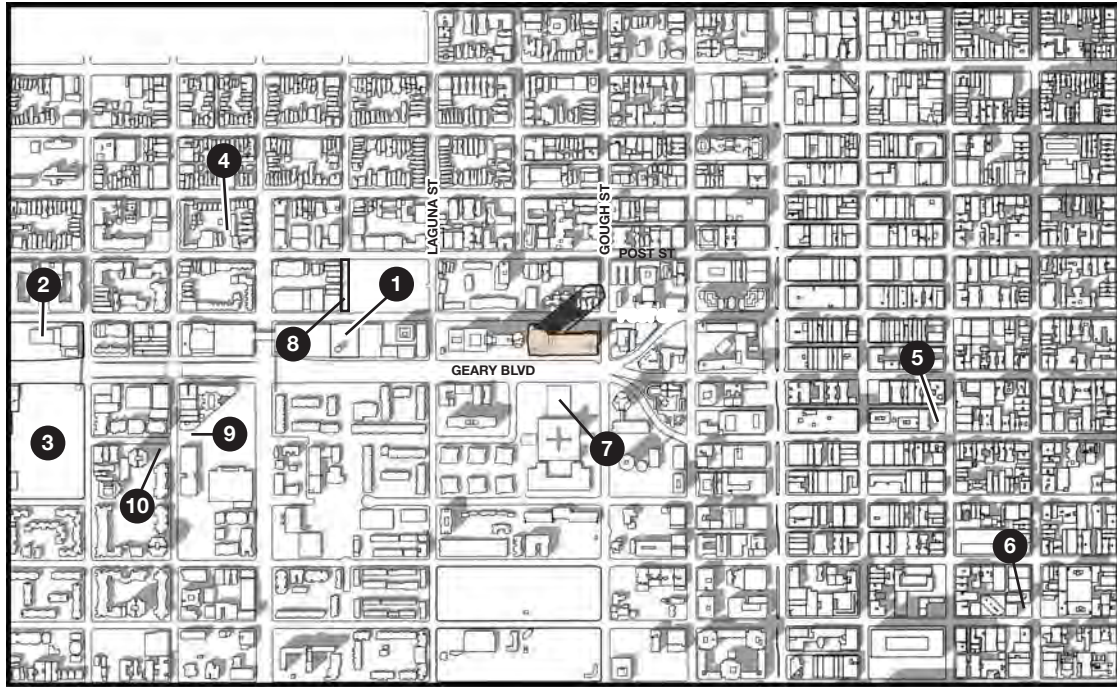
Noon

SOURCE: CADP Associates

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**FIGURE 4.F.3: EXISTING AND PROJECT SHADOW
AT 10:00 A.M. AND NOON PDT ON MARCH 23
(SEPTEMBER 20)**



3:00 P.M.

SOURCE: CADP Associates



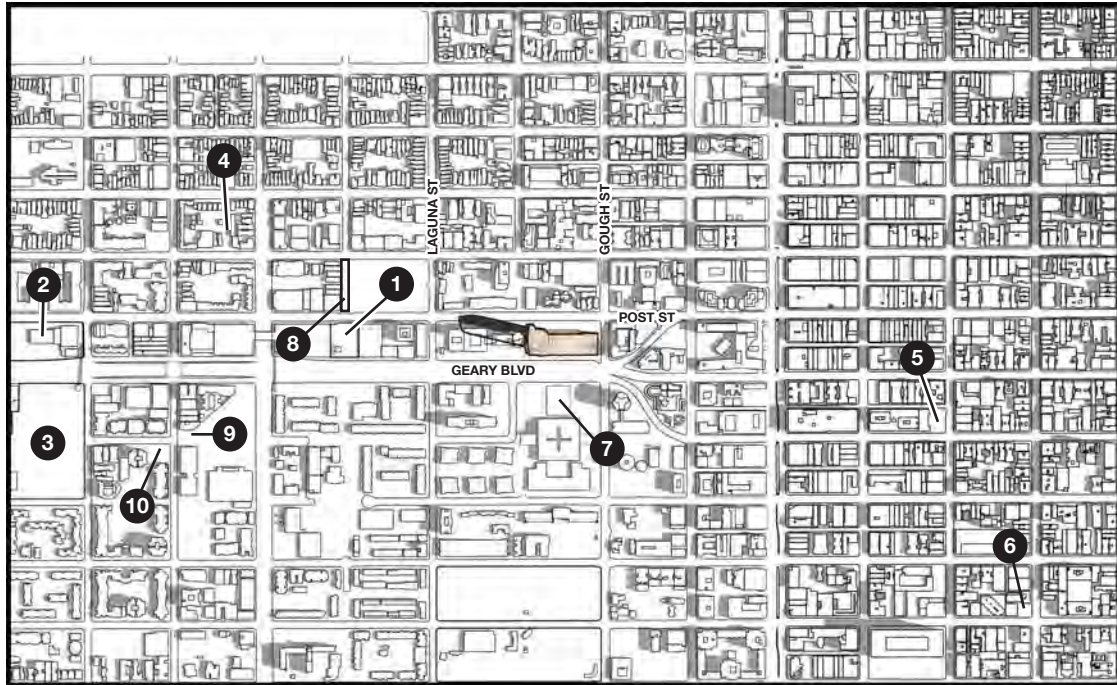
- Project Site
- Existing Shadows
- Net New Project Shadow

- 1** Peace Plaza
- 2** Hamilton Recreation Center
- 3** Raymond Kimbell Playground
- 4** Cottage Row Mini Park
- 5** Sergeant John Macaulay Park
- 6** Turk-Hyde Mini Park
- 7** Saint Mary's Cathedral Plaza
- 8** Buchanan Mall
- 9** Gene Suttle Plaza
- 10** Fillmore Center Plaza

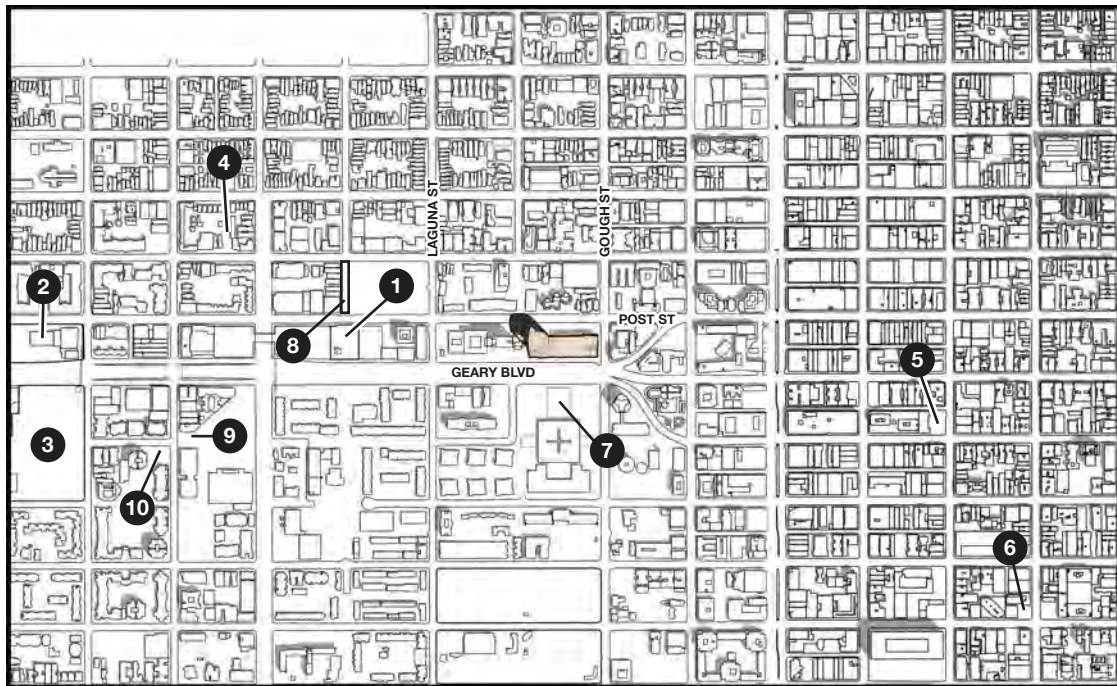
1333 GOUGH STREET/1481 POST STREET

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**FIGURE 4.F.4: EXISTING AND PROJECT SHADOW
AT 3:00 P.M. PDT ON MARCH 23
(SEPTEMBER 20)**



10:00 A.M.



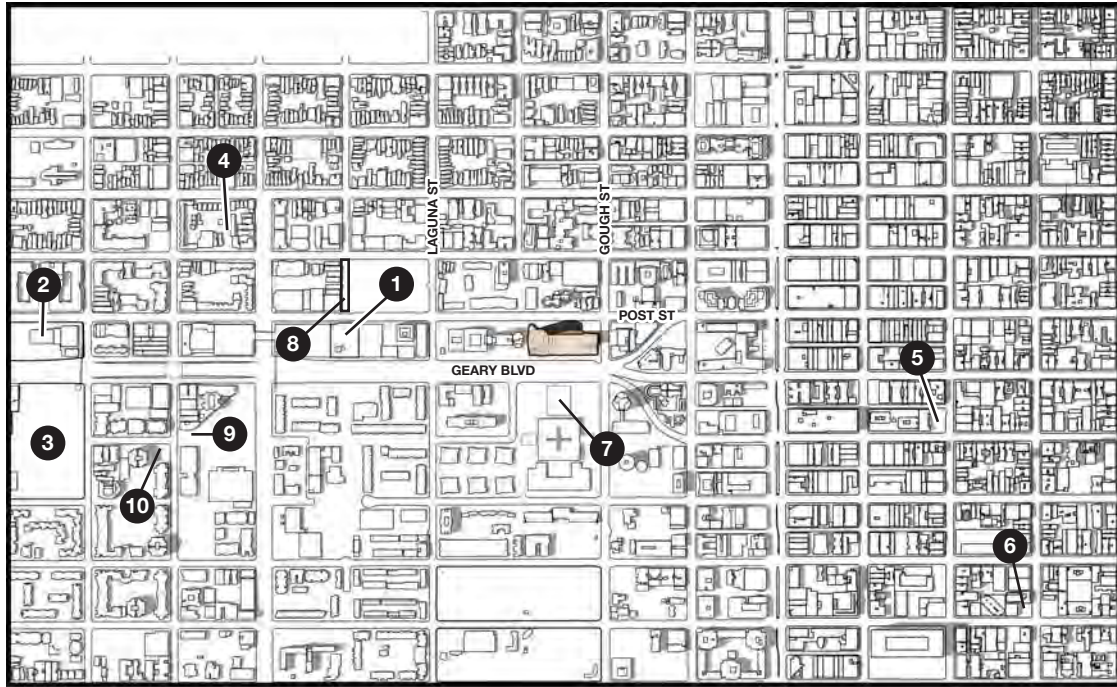
Noon

SOURCE: CADP Associates

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FIGURE 4.F.5: EXISTING AND PROJECT SHADOW
AT 10:00 A.M. AND NOON PDT ON JUNE 21



3:00 P.M.

SOURCE: CADP Associates



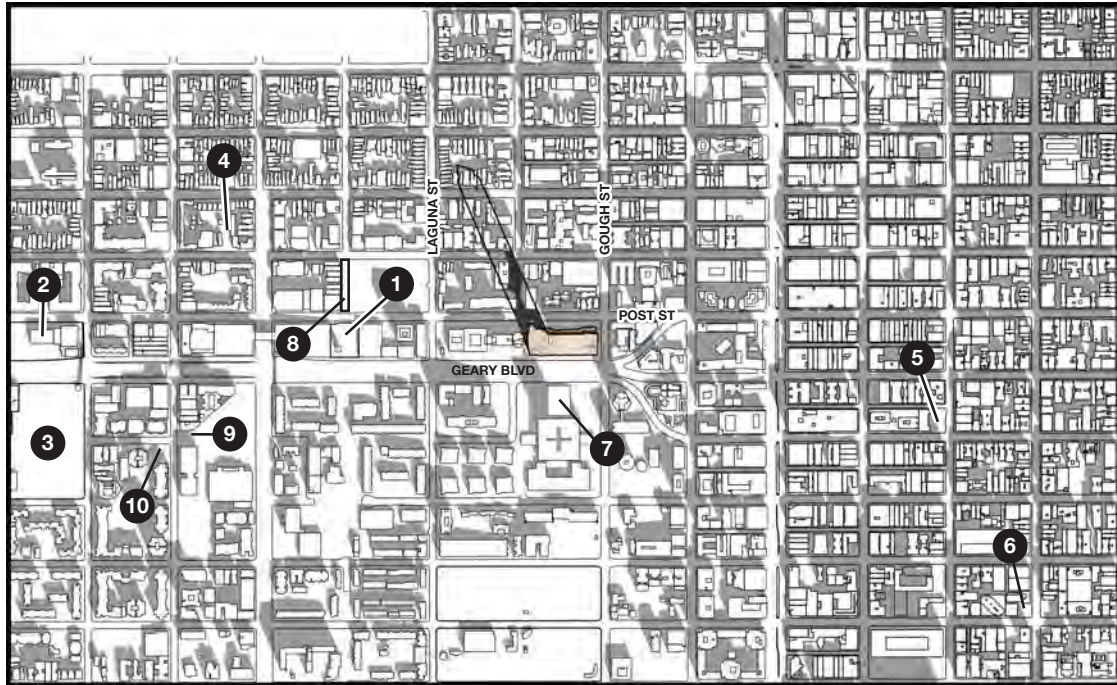
- Project Site
- Existing Shadows
- Net New Project Shadow

- 1** Peace Plaza
- 2** Hamilton Recreation Center
- 3** Raymond Kimbell Playground
- 4** Cottage Row Mini Park
- 5** Sergeant John Macaulay Park
- 6** Turk-Hyde Mini Park
- 7** Saint Mary's Cathedral Plaza
- 8** Buchanan Mall
- 9** Gene Suttle Plaza
- 10** Fillmore Center Plaza

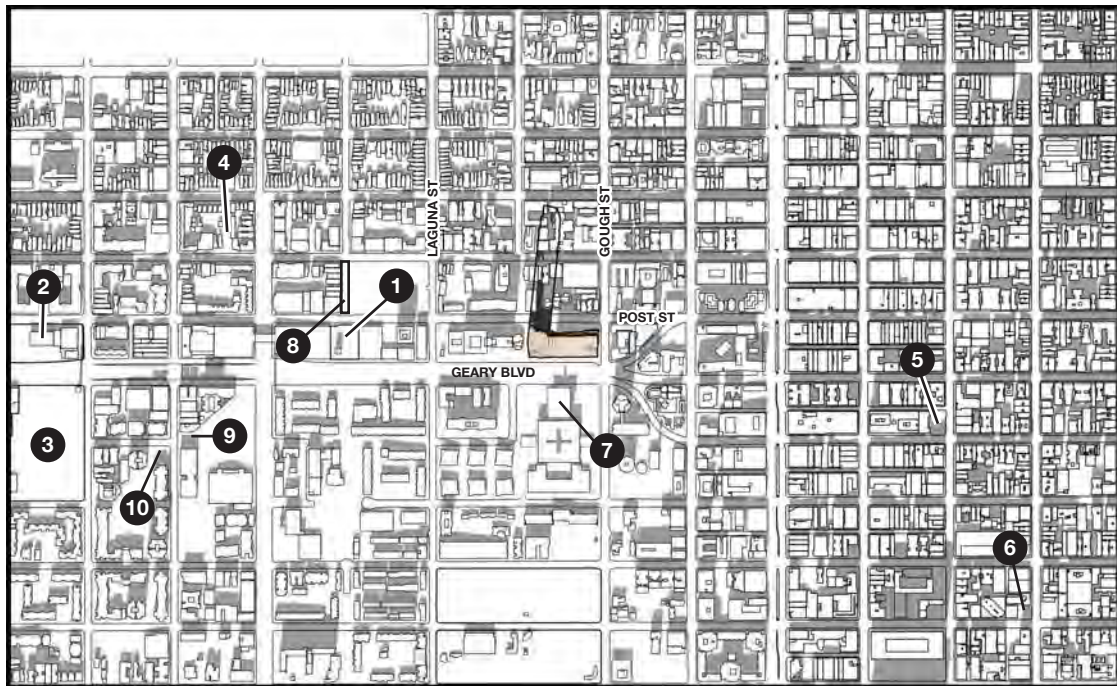
1333 GOUGH STREET/1481 POST STREET

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**FIGURE 4.F.6: EXISTING AND PROJECT SHADOW
AT 3:00 P.M. PDT ON JUNE 21**



10:00 A.M.



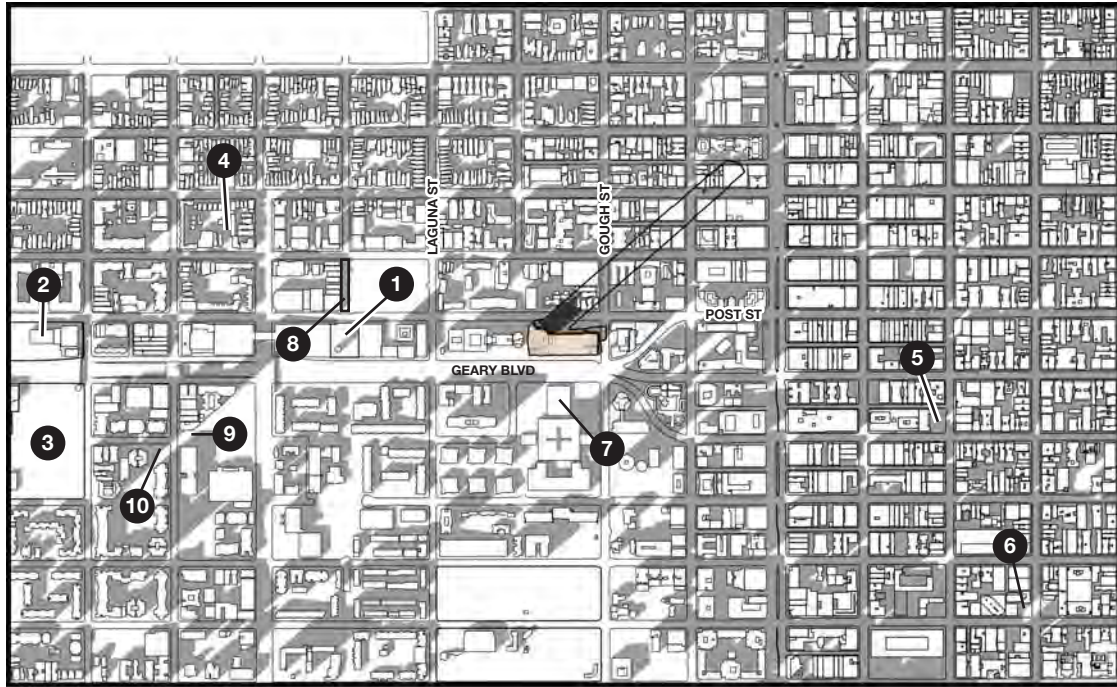
Noon

SOURCE: CADP Associates

1333 GOUGH STREET/1481 POST STREET

2005.0679E

FIGURE 4.F.7: EXISTING AND PROJECT SHADOW
AT 10:00 A.M. AND NOON PST ON DECEMBER 20



3:00 P.M.

SOURCE: CADP Associates



- Project Site
- Existing Shadows
- Net New Project Shadow

- 1** Peace Plaza
- 2** Hamilton Recreation Center
- 3** Raymond Kimbell Playground
- 4** Cottage Row Mini Park
- 5** Sergeant John Macaulay Park
- 6** Turk-Hyde Mini Park
- 7** Saint Mary's Cathedral Plaza
- 8** Buchanan Mall
- 9** Gene Suttle Plaza
- 10** Fillmore Center Plaza

1333 GOUGH STREET/1481 POST STREET

2005.0679E

**FIGURE 4.F.8: EXISTING AND PROJECT SHADOW
AT 3:00 P.M. PST ON DECEMBER 20**

Throughout the year, Raymond Kimbell Playground is shadowed by existing buildings during the morning and late afternoon. During the autumn, winter, and spring, the morning shadows begin at sunrise and recede as the day progresses, moving off the park shortly before 10:00 a.m. The afternoon shadows begin at approximately 3:00 p.m. and remain until the end of the day. During the summer, the morning shadows begin at sunrise and recede as the day progresses, moving off the park shortly after 9:00 a.m. The afternoon shadows begin shortly before 4:00 p.m. and remain until the end of the day (see **Figures 4.F.3** through **4.F.8**, on pp. 4.F.16-4.F.21).

Cottage Row Mini Park

Cottage Row Mini Park, on the north side of Sutter Street between Fillmore and Webster streets, is an approximately 7,240-square-foot park in the Western Addition neighborhood. The park is bounded by Sutter Street on the south and by residential properties on the west, north, and east. The terrain of the park slopes up from south to north. The west side of the park is landscaped with grass, small shrubs, and trees, and the east side of the park consists of a 9½-foot-wide north-south pedestrian path/stairway that connects Sutter Street to Bush Street. There is a dog play area in the park, but there are no other amenities such as restrooms or structured seating. The park is open from sunrise until sunset seven days a week.

Throughout the year, Cottage Row Mini Park is shadowed by existing buildings in the morning and late afternoon. During the spring, summer, and autumn, the morning shadows begin at sunrise and recede as the day progresses, moving off the park by approximately 10:30 a.m. The afternoon shadows begin at approximately 3:00 p.m. and remain until the end of the day. During the winter, the morning shadows begin at sunrise and recede as the day progresses, moving off the park at approximately 10:30 a.m. The afternoon shadows begin at approximately 1:00 p.m. and remain until the end of the day (see **Figures 4.F.3** through **4.F.8**, on pp. 4.F.16-4.F.21).

Sergeant John Macaulay Park

Sergeant John Macaulay Park, at the northwest corner of Larkin and O'Farrell streets, is an approximately 8,880-square-foot park in the Tenderloin neighborhood. The park is bounded by Myrtle Street on the north, Larkin Street on the east, O'Farrell Street on the south, and an existing four-story residential building on the west. A wrought iron fence runs along the northern, eastern, and southern sides of the park. There is a gate on Larkin Street and a gate on O'Farrell Street. The park is open from sunrise until sunset seven days a week, and the gates are locked at night. The perimeter of the park is landscaped with trees and small shrubs, and the interior of the park features several play structures for children.

During the spring, summer, and autumn, Sergeant John Macaulay Park is shadowed by existing buildings in the early morning and late afternoon. The shadows begin at sunrise and recede as the

day progresses. During the spring and autumn, the morning shadows move off the park at approximately 9:00 a.m. The afternoon shadows begin at approximately 2:00 p.m. and remain until the end of the day (see **Figures 4.F.3** and **4.F.4**, on pp. 4.F.16-4.F.17). During the summer, the morning shadows move off the park at approximately 8:00 a.m. The afternoon shadows begin at approximately 2:00 p.m. and remain until the end of the day (see **Figures 4.F.5** and **4.F.6**, on pp. 4.F.18-4.F.19). During the winter, all or large portions of the park are shadowed throughout the day (see **Figures 4.F.7** and **4.F.8**, on pp. 4.F.20-4.F.21).

Turk-Hyde Mini Park

Turk-Hyde Mini Park, at the northwest corner of Turk and Hyde streets, is an approximately 4,880-square-foot park in the Tenderloin neighborhood. The park is bounded by an existing six-story residential building on the north, Hyde Street on the east, Turk Street on the south, and an existing five-story residential building on the west. An open-grill metal fence runs along the eastern and southern sides of the park. There is a gate on Turk Street and a gate on Hyde Street. The park is open from sunrise until sunset, and the gates are locked at night. The perimeter of the park is landscaped with small shrubs, and there are two trees at the southwest corner of the park and one tree at the southeast corner of the park. The interior of the park features a play structure and a tire swing for children.

During the spring, summer, and autumn, Turk-Hyde Mini Park is shadowed by existing buildings in the early morning and late afternoon. The shadows begin at sunrise and recede as the day progresses. During the spring and autumn, the morning shadows move off the park at approximately 9:30 a.m. The afternoon shadows begin at approximately 1:30 p.m. and remain until the end of the day (see **Figures 4.F.3** and **4.F.4**, on pp. 4.F.16-4.F.17). During the summer, the morning shadows move off the park at approximately 9:00 a.m. The afternoon shadows begin at approximately 2:00 p.m. and remain until the end of the day (see **Figures 4.F.5** and **4.F.6**, on pp. 4.F.18-4.F.19). During the winter, all or large portions of the park are shadowed throughout the day (see **Figures 4.F.7** and **4.F.8**, on pp. 4.F.20-4.F.21).

Other Publicly Accessible Parks and Recreation Spaces

Some publicly accessible parks and recreation spaces are not under the jurisdiction of the Recreation and Park Commission; they are under the jurisdiction of other public agencies, or they are privately owned.

Saint Mary's Cathedral Plaza

The plaza in front of Saint Mary's Cathedral, on the south side of Geary Boulevard across from the project site, provides pedestrian access from the Geary Boulevard sidewalk to the main entrance of the cathedral. Stairs on the east and west sides of the plaza lead to the sunken parking

area underneath the plaza. In addition to providing pedestrian access, the plaza is occasionally used for civic events. The plaza is shadowed by existing buildings throughout the day and throughout the year. During the spring and autumn, the plaza is shadowed from the early morning until the afternoon; it is sunny from about 3:00 p.m. until the end of the day (6:09 p.m.). During the summer, the plaza is shadowed in the morning and the early evening; it is sunny from about 10:00 a.m. until 7:00 p.m. During the winter, all or large portions of the plaza are shadowed throughout the day.

Buchanan Mall

Buchanan Mall is a one-block-long plaza that occupies the Buchanan Street right-of-way between Sutter and Post streets. The north entrance, on Sutter Street, is marked by a gateway consisting of four concrete columns capped by a wooden trellis. The east and west sides of the plaza are lined by two-story buildings containing retail uses. Although the entire plaza is paved, it is closed to vehicular traffic. There are trees, planters, and benches throughout the plaza, and there are two fountains in the middle of the plaza. Buchanan Mall is primarily used as a pedestrian connector between Sutter and Post streets. The plaza is shadowed by existing buildings throughout the day and throughout the year. During the spring, summer, and autumn, the plaza is shadowed in the morning and late afternoon; it is sunny from about 11:00 a.m. until 3:30 p.m. (see **Figures 4.F.3** through **4.F.6**, on pp. 4.F.16-4.F.19). During the winter, the plaza is shadowed in the morning and the afternoon; it is sunny from about 10:30 a.m. until 12:30 p.m. (see **Figures 4.F.7** and **4.F.8**, on pp. 4.F.20-4.F.21).

Gene Suttle Plaza

Gene Suttle Plaza is an approximately 11,000-square-foot plaza on the east side of Fillmore Street halfway between Geary Boulevard and Ellis Street. It is bounded by a three-story building on the north, a Safeway parking lot on the east, a three-story building on the south, and Fillmore Street on the west. The northeast corner of the plaza is connected to a pedestrian path that runs diagonally from Geary Boulevard to the north. The entire plaza is paved with concrete and brick arranged in a checkerboard pattern. Renovation work on the plaza began in March 2014. When the renovations are completed, the plaza will remain completely paved with concrete and brick, but there will be planters with built-in benches throughout the plaza. The plaza is used as a mid-block pedestrian connector between Fillmore Street and the Safeway parking lot. It is also used as a venue for outdoor events organized by the San Francisco Jazz Center. The plaza is shadowed by existing buildings throughout the day and throughout the year. During the spring and autumn, the plaza is shadowed from the early morning until the early evening; it is sunny from about 6:00 p.m. until the end of the day (see **Figures 4.F.3** and **4.F.4**, on pp. 4.F.16-4.F.17). During the summer, the plaza is shadowed in the early morning and the late afternoon; it is sunny from about 7:00 a.m. until 4:00 p.m. (see **Figures 4.F.5** and **4.F.6**, on pp. 4.F.18-4.F.19). During the winter,

all or large portions of the plaza are shadowed throughout the day (see **Figures 4.F.7** and **4.F.8**, on pp. 4.F.20-4.F.21).

Fillmore Center Plaza

Fillmore Center Plaza is an approximately 16,000-square foot plaza at the southwest corner of O'Farrell and Fillmore streets. It is bounded by an 18-story building on the west, O'Farrell Street on the north, Fillmore Street on the east, and a five-story building on the south. The entire plaza is paved. There is a circular fountain with seating in the northeast corner, and there are palm trees and planters with seating in the southeast and northwest corners. The plaza serves as a gathering spot for neighborhood residents, and it is used for outdoor community events, including music concerts and movie screenings. It is also the site of the Fillmore Farmers' Market, which is held every Saturday from 9:00 a.m. until 1:00 p.m. The plaza is shadowed by existing buildings throughout the day and throughout the year. During the summer, the plaza is shadowed in the early morning and afternoon; it is sunny from about 9:00 a.m. until 1:30 p.m. (see **Figures 4.F.5** and **4.F.6**, on pp. 4.F.18-4.F.19). During the spring, autumn, and winter, all or large portions of the plaza are shadowed throughout the day (see **Figures 4.F.3** and **4.F.4**, on pp. 4.F.16-4.F.17, and **Figures 4.F.7** and **4.F.8**, on pp. 4.F.20-4.F.21).

Public Sidewalks

The sidewalks near the project site are shadowed by existing buildings throughout the day and throughout the year. In general, the sidewalks are shadowed in the early morning and the late afternoon and receive the greatest amount of sunlight during the middle of the day.

Privately Owned Privately Accessible Open Spaces

Privately owned privately accessible open spaces (i.e., not accessible to the public) include back yards, courtyards, balconies, and roof decks of nearby residential buildings. These open spaces are only accessible to the residents of those buildings. Depending on their locations, many of these open spaces are already shadowed by existing buildings throughout the day and throughout the year. In some cases, these open spaces are shadowed by the buildings with which they are associated.

REGULATORY FRAMEWORK

SAN FRANCISCO GENERAL PLAN

The *San Francisco General Plan (General Plan)* contains objectives and policies that are related to preserving sunlight on open spaces and other public areas. These objectives and policies are found in the Recreation and Open Space Element and the Urban Design Element.

Recreation and Open Space Element

The Recreation and Open Space Element states that solar access to public open space should be protected. In San Francisco, presence of the sun's warming rays is essential to enjoying open space. This is because climatic factors, including ambient temperature, humidity, and wind, usually combine to create a comfortable climate only when direct sunlight is present. Therefore, the shadows created by new development nearby can critically diminish the utility of the open space.

Urban Design Element

The Urban Design Element states that buildings to the south, east and west of parks and plazas should be limited in height or effectively oriented so as not to prevent the penetration of sunlight to such parks and plazas. Large buildings and developments should, where feasible, provide ground-level open space on their sites, well situated for public access and for sunlight penetration.

SAN FRANCISCO PLANNING CODE

Section 101.1

In November 1986, the voters of San Francisco approved Proposition M (the Accountable Planning Initiative), which added § 101.1 to the Planning Code and established eight Priority Policies. These Priority Policies shall be the basis upon which inconsistencies in the *General Plan* are resolved. Priority Policy No. 8 calls for the protection of parks and open space and their access to sunlight and vistas.

Prior to issuing a permit for any project which requires an Initial Study under CEQA, prior to issuing a permit for any demolition, conversion, or change of use, and prior to taking any action which requires a finding of consistency with the *General Plan*, the City is required to find that the proposed project or legislation would be consistent with the Priority Policies.

Section 295

In 1984, San Francisco voters approved an initiative known as “Proposition K, The Sunlight Ordinance,” which was codified in 1985 as Planning Code § 295. Section 295 prohibits the approval of “any structure that would cast any shade or shadow upon any property under the jurisdiction of, or designated for acquisition by, the Recreation and Park Commission” unless the Planning Commission, with review and comment by the Recreation and Park Commission, has found that the shadows cast by a proposed project would not have an adverse impact on the use of the property. Section 295 does not apply to structures that do not exceed 40 feet in height. The period analyzed is from the first hour after sunrise until the last hour before sunset.

On February 7, 1989, pursuant to Proposition K, the Planning Commission and the Recreation and Park Commission adopted a joint resolution adopting criteria for determination of significant shadows in 14 downtown parks, as described in a February 3, 1989, memorandum to the Planning Commission and the Recreation and Park Commission regarding “Proposition K, The Sunlight Ordinance.” These criteria establish an “absolute cumulative limit” (ACL) for new shadow allowed on these parks, as well as qualitative criteria for allocating the ACL among individual development projects. The ACL for a particular park is expressed as a percentage of the theoretical annual available sunlight (TAAS) on that park. The difference between the ACL and the amount of existing shadow on a particular park is commonly referred to as the “shadow budget” for that park. The shadow budget is then allocated to individual projects within the ACL based on qualitative criteria established for each park, which vary by park but may include factors such as the time of day, the time of year, shadow characteristics (size, duration, location), and the public good served by the building casting the shadow.

In 1989, the Planning Commission and the Recreation and Park Commission established an ACL of zero percent of the TAAS for Sergeant John Macaulay Park, meaning that no net new shadow from proposed buildings exceeding 40 feet in height could be cast on Sergeant John Macaulay Park.

The Planning Commission and the Recreation and Park Commission did not establish ACLs for new shadow on Peace Plaza, the Hamilton Recreation Center, Raymond Kimbell Playground, Cottage Row Mini-Park, and Turk-Hyde Mini Park.

This EIR analyzes the proposed project’s shadow impacts on six parks that are subject to the provisions of Planning Code § 295.

IMPACTS AND MITIGATION MEASURES

SIGNIFICANCE THRESHOLDS

The threshold for determining the significance of impacts in this analysis is consistent with the environmental checklist in Appendix G of the State *CEQA Guidelines*, which has been adopted and modified by the San Francisco Planning Department. For the purpose of this analysis, the following applicable threshold was used to determine whether implementing the project would result in a significant shadow impact. Implementation of the proposed project would have a significant shadow effect if the project would:

- Create new shadow in a manner that substantially affects outdoor recreation facilities or other public areas.

The thresholds for determining the significance of shadow impacts in San Francisco pursuant to CEQA and Planning Code § 295 are different. Under Planning Code § 295 and the joint Planning Commission and Recreation and Park Commission criteria, any shadow beyond the absolute cumulative limit is considered “significant” in the way that term is used in Planning Code § 295. In contrast, the significance threshold for environmental review addresses a broader array of shadow-related considerations that may include not only quantitative criteria, but also open space usage; time of day and/or time of year; physical layout and facilities affected; the intensity, size, shape, and location of the shadow; and the proportion of open space affected. If the Planning Department determines, based on these factors, that the use and enjoyment of the park or public space would be substantially and adversely affected, then the impact is “significant” in the way that term is used under CEQA. As a result, there are situations under which new shadow that would be considered significant under Planning Code § 295 would not have a significant environmental impact under CEQA. There are also situations under which new shadow that would be considered a significant environmental impact under CEQA would not be considered significant under Planning Code § 295. The purpose of the analysis in this EIR is to provide the public and City decision-makers with information that sufficiently describes the proposed project’s shadow in terms of the types of parks and open spaces that it would affect, when and where the shadow would occur, how long the shadow would last, and whether the shadow would adversely affect any activities or uses in the subject parks or open spaces.

APPROACH TO ANALYSIS

Shadow Fan

In order to determine whether any properties under the jurisdiction of the Recreation and Park Commission could be potentially affected by project shadow, the Planning Department prepared a “shadow fan” diagram. The shadow fan plots the maximum potential reach of project shadow over the course of a year (from one hour after sunrise until one hour before sunset on each day of the year) and plots the locations of nearby open spaces, recreation facilities, and parks. The shadow fan accounts for topographical changes but it does not account for existing shadows cast by existing buildings. The shadow fan is used by the Planning Department as the basis for initially identifying which open spaces, recreation facilities, and parks merit further study. Those that are outside the maximum potential reach of project shadow do not require further study.¹⁰

¹⁰ The Planning Department’s shadow fan for the proposed project, dated February 11, 2011, is available for review at the Planning Department, 1650 Mission Street, Suite 400, San Francisco, California, as part of Case File No. 2005.0679EE.

Shadow Calculations and Shadow Diagrams

Using a computer program that accounts for the heights of existing and proposed buildings as well as topographical features, CADP prepared shadow calculations for the six Recreation and Park Commission open spaces that could potentially be shadowed by the proposed project. Fog, rain, and shadows from trees, existing or proposed, are not taken into account.

Shadow diagrams are “snapshots” taken at particular representative times of day and days of the year. They illustrate the extent and location of shadows cast by existing buildings, net new shadow from a proposed development project, and the remaining sunlight on the subject open space. A series of shadow diagrams from the same day demonstrates how the shadow moves across the space over a specific period of time. Shadow diagrams are presented in this section (**Figures 4.F.3 through 4.F.8**) and serve as the basis for the qualitative discussion of shadow impacts. The times of day and the days of the year shown in Figures 4.F.3 through 4.F.8 provide representative samples of morning, midday, and afternoon shadow in each of the four seasons. These are not the only times of day or days of the year when existing shadow occurs or net new project shadow would occur.

Shadow Impacts on Privately Owned Privately Accessible Open Spaces

The relevant CEQA significance criterion for shadow impacts is presented above on p. 4.F.27. A project would be considered to have a significant impact related to the topic of shadow if the project were to “create new shadow in a manner that substantially affects outdoor recreation facilities or other public areas.” Privately owned privately accessible open spaces (i.e., not accessible to the public) are not considered public areas. For these reasons, no discussion of the proposed project’s shadow impacts on privately owned privately accessible open spaces is required under CEQA in this EIR. However, the decision-makers may consider special concerns related to shadow, independent of the environmental review process under CEQA, as part of the decision to approve, modify, or disapprove the proposed project.

PROJECT FEATURES

The proposed project consists of the construction of a new 36-story, 398-foot-tall (416 feet tall including an 18-foot-tall mechanical penthouse), residential high-rise tower, and it includes a request to reclassify the height limit for the project site from 240 feet to 410 feet. The proposed project has the potential to affect existing shadow conditions on and near the project site.

The proposed project includes three “site plan” variants as described in Chapter 2, Project Description, on pp. 2.30-2.34. The height and bulk/massing of the variants would be the same as those of the proposed project, so shadow impacts of the variants would be the same as those of

the proposed project. No separate analysis of the project variants is necessary under the topic of shadow.

IMPACT EVALUATION

The shadow fan prepared by the Planning Department showed that shadow from the proposed project could reach Peace Plaza, the Hamilton Recreation Center, Raymond Kimbell Playground, Cottage Row Mini-Park, Sergeant John Macaulay Park, and Turk-Hyde Mini Park, all of which are under the jurisdiction of the Recreation and Park Commission and subject to the provisions of Planning Code § 295. The potential shadow impacts of the proposed project on these open spaces are discussed below. The analysis is based on the shadow calculations and shadow diagrams that were prepared by CADP. The shadow diagrams are presented in **Figures 4.F.3** through **4.F.8**, on pp. 4.F.16-4.F.21. In addition, the potential shadow impacts of the proposed project on four other publicly accessible open spaces that are not under the jurisdiction of the Recreation and Park Commission and on public sidewalks are discussed below.

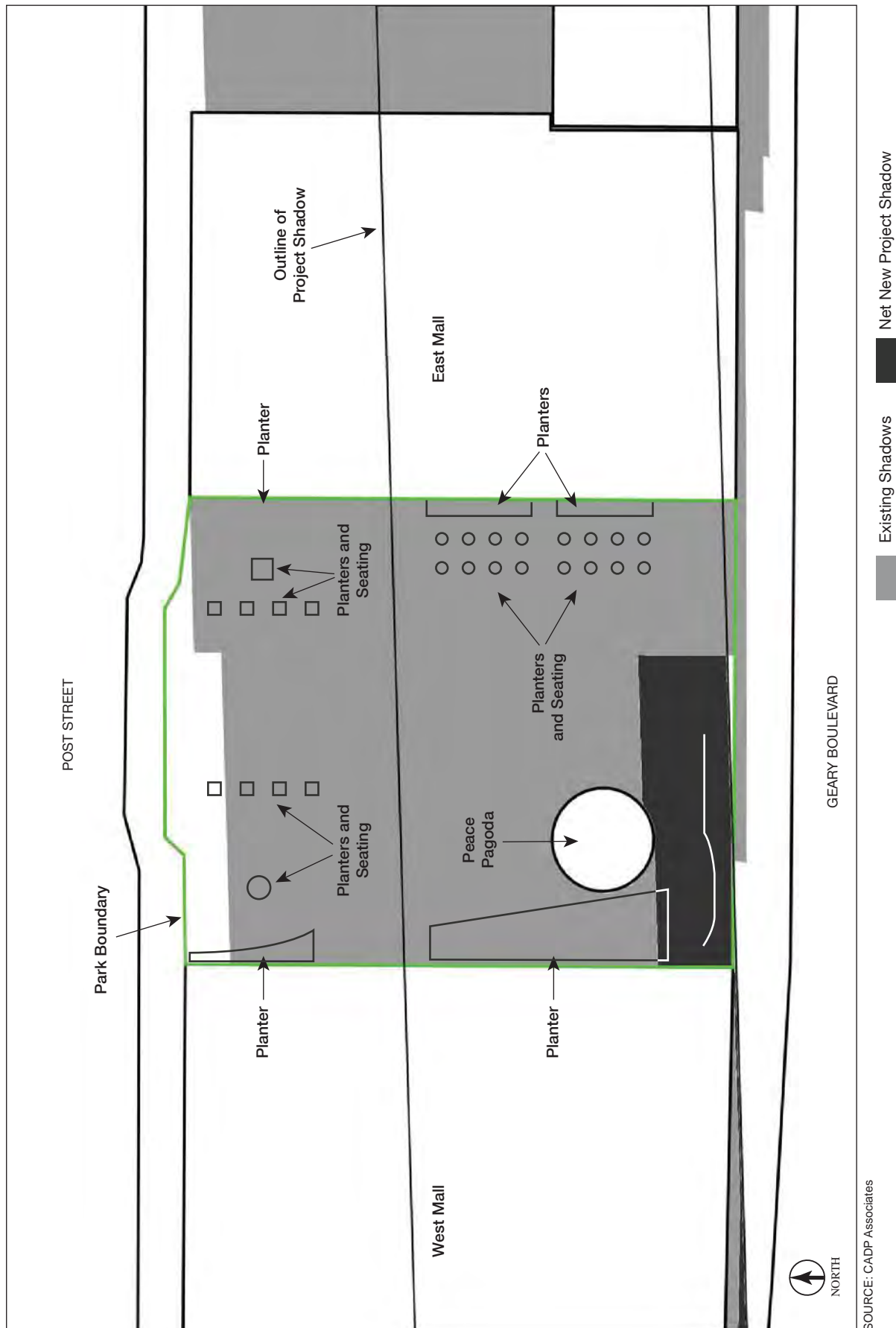
Impact WS-2: The proposed project would not create new shadow in a manner that substantially affects outdoor recreation facilities or other public areas.
(Less than Significant)

Recreation and Park Commission Properties

Peace Plaza

The proposed project would cast net new shadow on Peace Plaza in the early morning from mid-April through late August. April 13 would be the first day on which the proposed project would cast net new shadow on the plaza (from 7:37 a.m. until 7:45 a.m.). On May 11 and August 2, the net new shadow would reach its maximum duration of approximately 63 minutes (from 7:12 a.m. until 8:15 a.m.). At 7:45 a.m. on May 11 and August 2, the net new shadow would reach its maximum size, covering an area of approximately 12,255 square feet in the southern portion of the plaza (see **Figure 4.F.9: Maximum Extent of Net New Project Shadow on Peace Plaza at 7:45 a.m. PDT on August 2**). August 30 would be the last day on which the proposed project would cast net new shadow on the plaza (from 7:37 a.m. until 7:45 a.m.). The proposed project would not cast net new shadow on Peace Plaza after 8:15 a.m. on any day of the year.

As discussed under “Regulatory Framework,” on p. 4.F.27, the Recreation and Park Commission did not establish an ACL for net new shadow on Peace Plaza. Peace Plaza receives about 111,493,293 square-foot-hours (sfh) of TAAS. There are about 658,566 sfh of existing annual shadow on Peace Plaza (0.59 percent of the TAAS). On an annual basis, the proposed project would cast about 516,353 sfh of net new shadow on Peace Plaza. This increase in net new shadow is approximately 0.46 percent of the TAAS.



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**FIGURE 4.F.9: MAXIMUM EXTENT
OF NET NEW PROJECT SHADOW ON
PEACE PLAZA AT 7:45 A.M. PDT ON AUGUST 2**

The net new shadow would fall on the southern portion of the plaza. This area of the plaza includes the 80-foot-tall Peace Pagoda in the southwest corner, seating around the base of the pagoda, a pedestrian entrance from Geary Boulevard, and landscaping in the southeast corner. The net new shadow would occur early in the morning at a time when the plaza is not heavily used and when the plaza is already largely shaded by existing shadow from The Sequoias and the Miyako Hotel to the east of the plaza. Aside from pedestrians passing through the plaza, there is little activity in the plaza at this time of day. Of the four people observed during a site visit, three were sitting or lingering in areas of existing shadow.¹¹ To the extent that there may be people using the southern portion of the plaza during the early morning hours, they would not be seeking a sunlit open space.

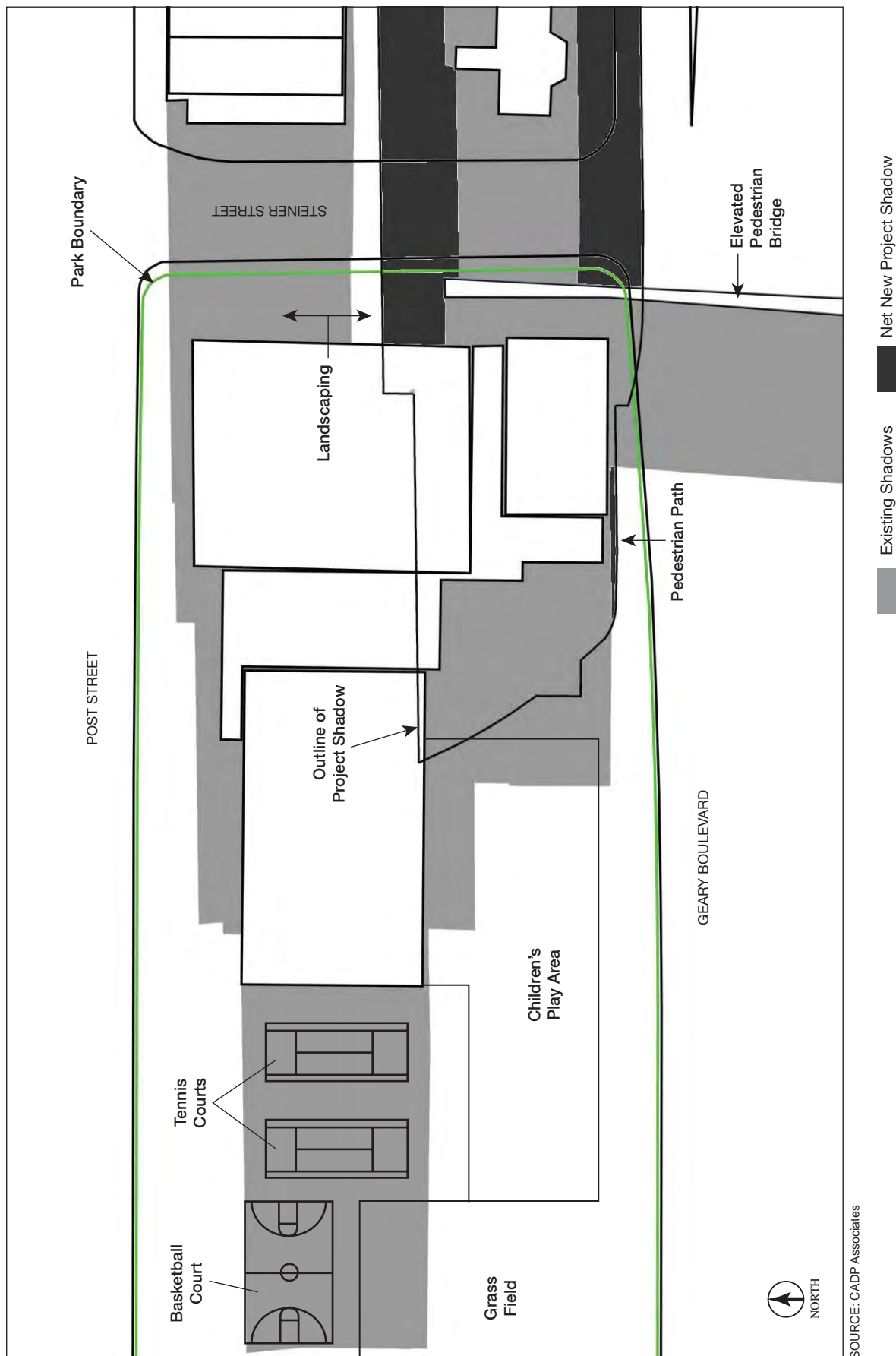
The net new shadow would not substantially affect the use of the seating areas around the base of the pagoda, because the seating areas can continue to be used even if they are shadowed, although the seating areas may be less pleasant without sunlight. Visitors to the plaza who prefer to sit, walk, or practice tai chi in sunlit areas would have ample opportunities to move to other areas in the northern and eastern portions of the plaza. With implementation of the proposed project, Peace Plaza would continue to receive about 6 to 7 hours of sunlight a day during the spring, summer, and autumn, and about 4 hours of sunlight a day during the winter. For these reasons, the proposed project would have a less-than-significant shadow impact on Peace Plaza, and no mitigation measures are necessary.

Hamilton Recreation Center

The proposed project would cast net new shadow on the Hamilton Recreation Center in the early morning for one week in mid- to late April and one week in mid-August. The proposed project would not cast net new shadow on the Hamilton Recreation Center at any other time during the year.

In the spring, April 20 would be the first day on which the proposed project would cast net new shadow on the park (at 7:31 a.m.), and April 27 would be the last day on which the proposed project would cast net new shadow on the park. On April 27, the net new shadow would reach its maximum duration of approximately 5 minutes (from 7:25 a.m. until 7:30 a.m.). At 7:25 a.m. on April 27 and August 16, the net new shadow would reach its maximum size, covering an area of approximately 5,380 square feet in a landscaped area (small shrubs) along the east façade of the recreation building (see **Figure 4.F.10: Maximum Extent of Net New Project Shadow on Hamilton Recreation Center at 7:25 a.m. PDT on August 16**). In the summer, August 16 would be the first day on which the proposed project would cast net new shadow on the park (from 7:25 a.m. until 7:30 a.m.), and August 23 would be the last day on which the proposed

¹¹ Field observation on May 12, 2014.



SOURCE: CADP Associates
2005.0679E

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**FIGURE 4.F.10: MAXIMUM EXTENT
OF NET NEW PROJECT SHADOW ON
HAMILTON RECREATION CENTER
AT 7:25 A.M. PDT ON AUGUST 16**

project would cast net new shadow on the park (at 7:31 a.m.). On August 16, the net new shadow would reach its maximum duration of approximately five minutes (from 7:25 a.m. until 7:30 a.m.).

The net new shadow would fall on the roof of the recreation building at the east end of the park, on landscaping in front of the east façade of the recreation building, and on landscaping and a paved pedestrian path in front of the south façade of the recreation building. With the exception of the pedestrian path, these areas of the park are not used for recreation. There is no activity along the pedestrian path at this time of day.¹² The net new shadow on the pedestrian path would be a thin sliver that would be brief in duration and would not affect the transient nature of the use of the pedestrian path. Given the short duration of the net new shadow and the time of day at which it would occur, implementation of the proposed project would not adversely affect the use of the park. For these reasons, the proposed project would have a less-than-significant shadow impact on Hamilton Recreation Center, and no mitigation measures are necessary.

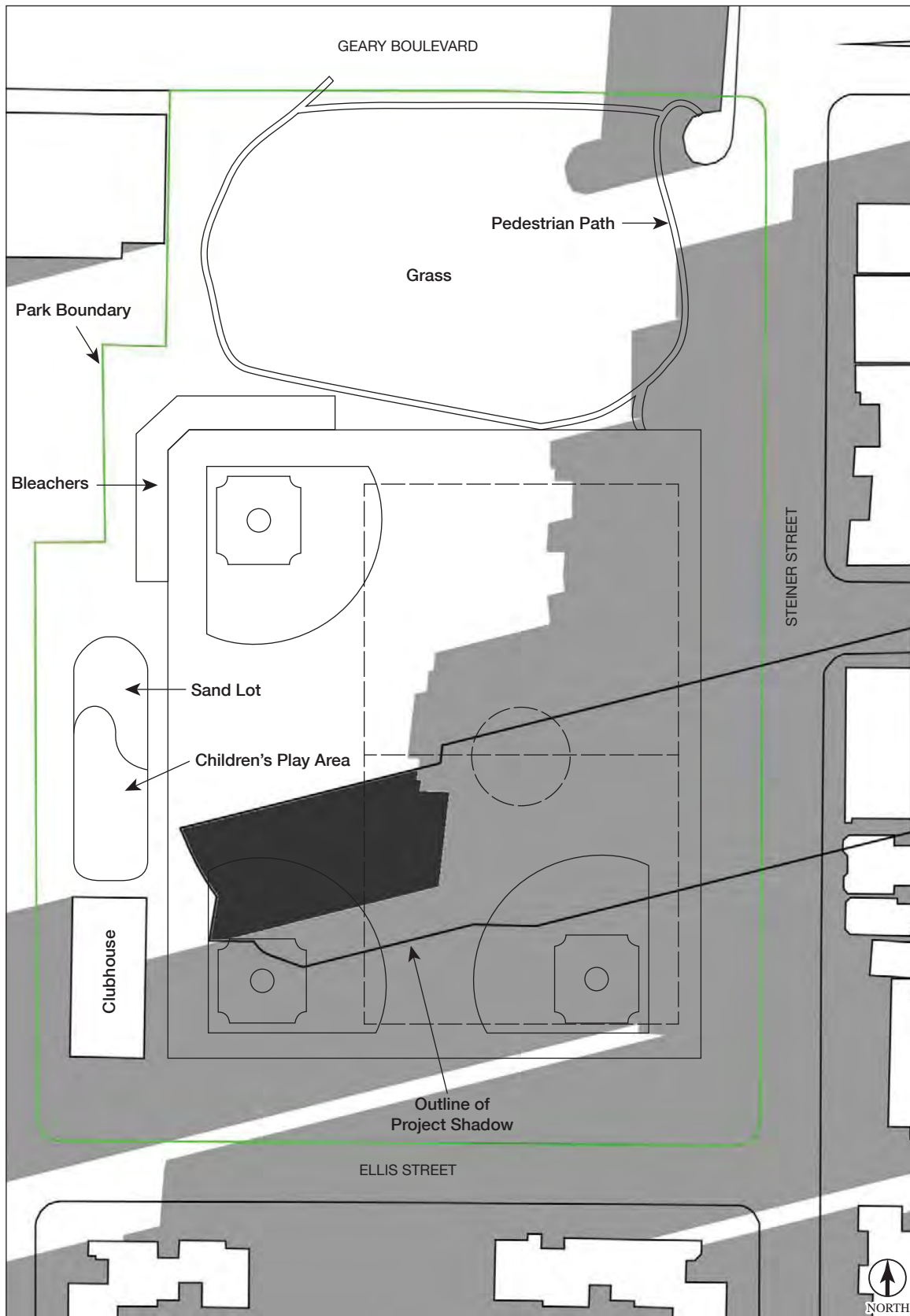
Raymond Kimbell Playground

The proposed project would cast net new shadow on Raymond Kimbell Playground in the early morning from mid-May through early August. May 11 would be the first day on which the proposed project would cast net new shadow on the park (from 7:12 a.m. until 7:15 a.m.). On June 1 and July 12, the net new shadow would reach its maximum duration of approximately four minutes (from 6:56 a.m. until 7:00 a.m.). At 6:46 a.m. on June 21, the net new shadow would reach its maximum size, covering an area of approximately 25,580 square feet in the outfield area of the two southernmost baseball fields (see **Figure 4.F.11: Maximum Extent of Net New Project Shadow on Raymond Kimbell Playground at 6:46 a.m. PDT on June 21**). August 2 would be the last day on which the proposed project would cast net new shadow on the park (from 7:12 a.m. until 7:15 a.m.). The proposed project would not cast net new shadow on Raymond Kimbell Playground at any other time of the year.

The net new shadow would fall on the outfields of the two southernmost baseball diamonds in the park. This area of the park doubles as the southwest corner of the soccer field. Although Raymond Kimbell Playground opens at sunrise, the early morning is not the period of heavy or peak activity. During a site visit, a small number of people were observed jogging or walking along the perimeter of the park at this time of day, but there was no activity in the area of the park that would be affected by the net new project shadow.¹³ Organized activities, such as baseball or softball games or soccer matches, typically begin at 8:00 a.m. or later. Occasionally, some

¹² Field observation on May 13, 2014.

¹³ Field observation on May 13, 2014.



SOURCE: CADP Associates

Existing Shadows Net New Project Shadow

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2005.0679E

**FIGURE 4.F.11: MAXIMUM EXTENT
OF NET NEW PROJECT SHADOW ON
RAYMOND KIMBELL PLAYGROUND
AT 6:46 A.M. PDT ON JUNE 21**

organized activities begin at 7:00 a.m.¹⁴ Due to its short duration, the net new project shadow would have little impact on organized activities that begin at 7:00 a.m. Given the time of day at which the net new shadow would occur and its short duration, implementation of the proposed project would not adversely affect the use of the park. For these reasons, the proposed project would have a less-than-significant shadow impact on Raymond Kimbell Playground, and no mitigation measures are necessary.

Cottage Row Mini Park

The proposed project would cast net new shadow on Cottage Row Mini Park in the early morning on two days of the year, September 20 and March 23. On each day, net new shadow would last for about three minutes (from 7:57 a.m. until 8:00 a.m.). The proposed project would not cast net new shadow on Cottage Row Mini Park at any other time during the year.

At 8:00 a.m. on March 23 and September 20, the net new shadow would reach its maximum size, covering an area of approximately 580 square feet along the southern edge of the park (see **Figure 4.F.12: Maximum Extent of Net New Project Shadow on Cottage Row Mini Park at 8:00 a.m. PDT on September 20**). This area of the park is landscaped with small shrubs, and there is no structured seating. The primary function of this area of the park is to provide pedestrian access to the dog play area and the pedestrian path that connects Sutter Street to Bush Street. Dog walkers pass through but do not stop and linger in this part of the park at this time of day.¹⁵ Given the short duration of the net new shadow, the time of day at which it would occur, and the transient nature of the use of the affected area, implementation of the proposed project would not adversely affect the use of the park. For these reasons, the proposed project would have a less-than-significant shadow impact on Cottage Row Mini Park, and no mitigation measures are necessary.

Sergeant John Macaulay Park

The Planning Department's shadow fan indicated that shadow from the proposed project could reach the western portion of Sergeant John Macaulay Park. However, the Planning Department shadow fan does not account for existing buildings, and the shadow calculations prepared by CADP indicate that the proposed project would not cast net new shadow on the park at any time during the year. Shadow from the proposed project would be masked by existing shadows cast by other buildings. Thus, the proposed project would comply with the provisions of Planning Code § 295 and would have no shadow impact on Sergeant John Macaulay Park.

¹⁴ Telephone conversation between Peter Mye of Turnstone Consulting and Dana Ketchum of the Recreation and Park Department, June 13, 2014.

¹⁵ Field observation on May 13, 2014.



**FIGURE 4.F.12: MAXIMUM EXTENT
OF NET NEW PROJECT SHADOW ON
COTTAGE ROW MINI PARK AT
8:00 A.M. PDT ON SEPTEMBER 20**

SOURCE: CADP Associates

1333 GOUGH STREET/1481 POST STREET

2005.0679E

Turk-Hyde Mini Park

The Planning Department's shadow fan indicated that shadow from the proposed project could reach the Turk-Hyde Mini Park. However, the Planning Department shadow fan does not account for existing buildings, and the shadow calculations prepared by CADP indicate that the proposed project would not cast net new shadow on the park at any time during the year. Shadow from the proposed project would be masked by existing shadows cast by other buildings. Thus, the proposed project would comply with the provisions of Planning Code § 295 and would have no shadow impact on Turk Hyde Mini Park.

Conclusion

The proposed project would cast net new shadow on four publicly accessible open spaces that are under the jurisdiction of the Recreation and Park Commission. The net new shadow would occur during the early morning when these open spaces are not heavily used. The duration of net new shadow on the Hamilton Recreation Center, Raymond Kimbell Playground, and Cottage Row Mini Park would be short. The duration of net new shadow on Peace Plaza would be longer, but park users seeking sunlight would have ample opportunities to move to other locations in the park. The proposed project would not cast net new shadow on Sergeant John Macaulay Park or the Turk-Hyde Mini Park at any time during the year. For these reasons, the proposed would have a less-than-significant impact on publicly accessible open spaces under the jurisdiction of the Recreation and Park Commission, and no mitigation measures are necessary.

Other Publicly Accessible Open Spaces

Shadow from the proposed project would reach several publicly accessible open spaces that are not under the jurisdiction of the Recreation and Park Commission but are under the jurisdiction of other public agencies.

Saint Mary's Cathedral Plaza

As shown on **Figure 4.F.2** on p. 4.F.13, the plaza at Saint Mary's Cathedral is almost due south of the proposed tower and is outside the proposed project's shadow fan. For this reason, shadow from the proposed tower would not reach the plaza at any time during the year.

Buchanan Mall

In the morning during the spring and autumn, when shadow from the proposed project would fall in the direction of Buchanan Mall, that shadow would be masked by existing shadows cast by other buildings. At other times of day during the spring and autumn and at all other times of the year, the shadow from the proposed project would not fall in the direction of Buchanan Mall

given the sun's position in the sky. For these reasons, the proposed project would not cast net new shadow on Buchanan Mall at any time during the year.

Gene Suttle Plaza

During the summer, the proposed project would cast net new shadow on the northern half of Gene Suttle Plaza at the beginning of the day (one hour after sunrise) for about 13 minutes. By 7:00 a.m., the net new project shadow would move off the plaza. In the early morning, the plaza is used primarily as a pedestrian passage; very few people stop to linger or sit in the plaza at this time of day.¹⁶ Given the short duration of the net new shadow, the time of day at which it would occur, and the transient nature of the use of the affected area at this time of day, implementation of the proposed project would not adversely affect the use of the plaza. At other times of day during the summer and at all other times of the year, the shadow from the proposed project would not fall in the direction of Gene Suttle Plaza given the sun's position in the sky. For these reasons, the proposed project would have a less-than-significant shadow impact on Gene Suttle Plaza, and no mitigation measures are necessary.

Fillmore Center Plaza

During the summer, the proposed project would cast net new shadow on the northern half of Fillmore Center Plaza at the beginning of the day (one hour after sunrise) for about eight minutes. By 6:55 a.m., the net new project shadow would move off the plaza. In the early morning, the plaza is used primarily as a pedestrian passage to and from the Fillmore Center apartment complex and as a waiting area for the 22 Fillmore Muni bus and private shuttle buses transporting passengers to Silicon Valley.¹⁷ The proposed project would not cast net new shadow on the Fillmore Farmers' Market, which does not open until 9:00 a.m. on Saturday mornings. Given the short duration of the net new shadow, the time of day at which it would occur, and the transient nature of the use of the affected area at this time of day, implementation of the proposed project would not adversely affect the use of the plaza. At other times of day during the summer and at all other times of the year, the shadow from the proposed project would not fall in the direction of Fillmore Center Plaza given the sun's position in the sky. For these reasons, the proposed project would have a less-than-significant shadow impact on Fillmore Center Plaza, and no mitigation measures are necessary.

¹⁶ Field observation on May 12, 2014.

¹⁷ Field observation on May 12, 2014.

Conclusion

The proposed project would cast net new shadow on Gene Suttle Plaza and Fillmore Center Plaza in the early morning during the summer. Neither open space is heavily used at this time of day, and the duration of the net new shadow would be short. The proposed project would not cast net new shadow on Saint Mary's Cathedral Plaza or Buchanan Mall at any time during the year. For these reasons, the proposed would have a less-than-significant impact on publicly accessible open spaces that are not under the jurisdiction of the Recreation and Park Commission, and no mitigation measures are necessary.

Public Sidewalks

The following discussion describes the shadow impacts of the proposed project on public sidewalks in the project vicinity. The discussion focuses on four representative days of the year (one day for each season). Shadow would occur on other days throughout the year in addition to the four days discussed below.

March 23

Throughout the day, the proposed project would cast net new shadow on the sidewalks along the three-block segment of Post Street between Laguna and Franklin streets. The proposed project would also cast net new shadow on the sidewalks along the three-block segment of Sutter Street between Fillmore and Laguna streets in the morning (from 7:57 a.m. until 9:30 a.m.) and on the sidewalks at the intersection of Gough and Post streets in the late afternoon (from 3:30 p.m. until 5:30 p.m.) (see **Figures 4.F.3** and **4.F.4**, on pp. 4.F.16-4.F.17).

June 21

In the morning (from 6:47 a.m. until 9:30 a.m.), the proposed project would cast net new shadow on the sidewalks at the intersection of Fillmore and O'Farrell streets, on the sidewalks along the two-block segment of Geary Boulevard between Webster and Laguna streets, and on the sidewalks at the intersection of Laguna and Post streets. From 9:30 a.m. until 3:00 p.m., the proposed project would cast net new shadow on the sidewalks along the two-block segment of Post Street between Laguna and Gough streets. In the late afternoon and early evening (from 4:00 p.m. until 7:36 p.m.), the proposed project would cast net new shadow on the sidewalks along Gough Street between Post Street and Geary Boulevard, on the sidewalks along Geary Boulevard between Gough and Franklin streets, and on the sidewalks along Peter Yorke Way and Starr King Way (see **Figures 4.F.5** and **4.F.6**, on pp. 4.F.18-4.F.19).

September 20

The shadow patterns that would occur on September 20 would be the same as the shadow patterns that would occur on March 23 (see discussion above).¹⁸

December 20

Throughout the day, the proposed project would cast net new shadow on the sidewalks along the two-block segment of Post Street between Laguna and Gough streets. The proposed project would also cast net new shadow on the sidewalks along Octavia Street between Sutter and Bush streets in the late morning (from 10:30 a.m. until 11:30 a.m.) and on the sidewalks at the intersection of Sutter and Gough streets in the mid-afternoon (from 1:30 p.m. until 2:30 p.m.) (see **Figures 4.F.7** and **4.F.8**, on pp. 4.F.20-4.F.21).

Conclusion

The proposed project would cast net new shadow on nearby sidewalks, including, but not limited to, those along Geary Boulevard, Laguna Street, Octavia Street, Post Street, and Sutter Street, at certain times of day throughout the year. Many of the sidewalks in the project vicinity are already shadowed for portions of the day by densely developed multi-story buildings, and net new project shadow would be transitory in nature and would not substantially affect the use of the sidewalks. Overall, the proposed project would not increase the amount of shadow on the sidewalks above levels that are common and generally expected in densely developed urban environments. For these reasons, the proposed project would have a less-than-significant shadow impact on sidewalks in the project vicinity, and no mitigation measures are necessary.

CUMULATIVE IMPACT EVALUATION

Impact C-WS-2: The proposed project in combination with past, present, and reasonably foreseeable future projects in the project vicinity would not create new shadow in a manner that substantially affects outdoor recreation facilities or other public areas. The proposed project would not make a cumulatively considerable contribution to a significant cumulative shadow impact. (*Less than Significant*)

¹⁸ The sun's position in the sky is symmetrical throughout the entire solar year. One half of the solar year begins on June 21 and ends on December 20, and the other half of the solar year begins on December 21 and ends on June 20. Each day in the first half of the solar year has an equivalent solar date in the second half of the solar year, with the spring and autumn equinoxes (March 20 or 21 and September 22 or 23, respectively) being equivalent solar dates. For this reason, the shadow patterns on March 23 would be the same as the shadow patterns on September 20.

There are several proposed projects in the project vicinity that have the potential to shade some of the same areas as would the proposed project and result in cumulative shadow impacts on these open spaces. These reasonably foreseeable future projects are 1433 Bush Street, 1527-1545 Pine Street, 1634-1690 Pine Street, 1101 Van Ness Avenue/1255 Post Street (the California Pacific Medical Center Cathedral Hill medical campus), 1800 Van Ness Avenue / 1749 Clay Street, the Geary Bus Rapid Transit (Geary BRT) Project, the Van Ness Bus Rapid Transit (Van Ness BRT) Project, the Transit Effectiveness Project (TEP)(see **Section 4.A, Introduction** [to Environmental Setting, Impacts, and Mitigation], pp. 4.A.6-4.A.7) for more information about these projects

The Geary BRT Project, Van Ness BRT Project, and TEP do not include the construction of buildings or structures that exceed 40 feet in height and would not shadow any of the same open spaces as would the proposed project. The Planning Department's shadow fans for 1433 Bush Street, 1527-1545 Pine Street, 1634-1690 Pine Street, and 1800 Van Ness Avenue/1749 Clay Street show that these projects would not shadow any of the same open spaces as would the proposed project.¹⁹ The Planning Department's shadow fan for the CPMC Project shows that shadow from the CPMC Project has the potential to reach Sergeant John Macaulay Park and the Tenderloin Recreation Center at certain times of day during the year.²⁰ Shadow from the proposed project at 1333 Gough Street/1481 Post Street would not cast net new shadow on Sergeant John Macaulay Park and would not reach the Tenderloin Recreation Center and would thus not be cumulatively considerable.

As discussed under **Impact WS-2**, the proposed project would cast net new shadow on sidewalks in the project vicinity at certain times of day throughout the year. Due to the dispersed locations of the reasonably foreseeable future projects, it is unlikely that they would combine with the proposed project to cast net new shadow on the same sidewalks at the same time of day and/or the same time of year. The sidewalks in the project vicinity are already shadowed for much of the day by densely developed, multi-story buildings. Although implementation of the proposed project and the reasonably foreseeable future projects would add net new shadow to the sidewalks in the project vicinity, these shadows would be transitory in nature, would not substantially affect the use of the sidewalks, and would not increase shadows above levels that are common and generally expected in an urban environment.

¹⁹ The Planning Department's shadow fans for 1433 Bush Street (Case No. 2009.1074K), 1527-1545 Pine Street (Case No. 2006.0383K), 1634-1690 Pine Street (Case No. 2011.1306K), and 1800 Van Ness Avenue/1749 Clay Street (Case No. 2004.0339K) are available for review at the San Francisco Planning Department, 1650 Mission Street, Suite 400, as part of Case File No. 2005.0679E.

²⁰ The Planning Department's shadow fan for the CPMC Project (Case No. 2005.0555K) is available for review at the San Francisco Planning Department, 1650 Mission Street, Suite 400, as part of Case File No. 2005.0679E.

4. Environmental Setting, Impacts, Mitigation

F. Wind and Shadow

Shadow

For these reasons, the proposed project, in combination with past, present, and reasonably foreseeable future projects in the project vicinity, would not have a significant cumulative shadow impact on outdoor recreation facilities and other public areas. The proposed project would not make a cumulatively considerable contribution to a significant cumulative shadow impact, and no mitigation measures are necessary.

5. OTHER CEQA CONSIDERATIONS

A. GROWTH-INDUCING IMPACTS

As required by § 15126.2(d) of the *CEQA Guidelines*, an EIR must consider the ways in which the proposed project could directly or indirectly foster economic or population growth, or the construction of additional housing. Growth-inducing impacts can result from the elimination of obstacles to growth; through increased stimulation of economic activity that would, in turn, generate increased employment or demand for housing and public services; or as a result of policies or measures which do not effectively minimize premature or unplanned growth. Examples of projects likely to have substantial or adverse growth-inducing effects include expansion of infrastructure systems beyond what is needed to serve current demand in the project vicinity, and development of new residential uses in areas that are currently sparsely developed or undeveloped. The following discussion considers whether implementation of the proposed project could potentially affect growth elsewhere in San Francisco and in the region.

The proposed project would intensify development on the project site by introducing new residential and retail uses. Population growth in the project vicinity would be a direct impact of the proposed project. Among the basic objectives of the proposed project is the development of in-fill, high-density residential development near transit to support the Geary Bus Rapid Transit project and the enhancement of the pedestrian experience through streetscape improvements and new open space along Geary Boulevard and Post Street to better connect the Cathedral Hill and Japantown neighborhoods. As described in more detail in the Initial Study on p. 48 (see **Appendix A** to this EIR), if implemented, the addition of 262 residential units would increase the population on the project site by approximately 597 residents. Although this increase would represent approximately 0.5 percent of citywide population growth between 2010 and 2030, population growth attributable to the proposed project would be consistent with City and regional population projections. The development of 262 new residential units would increase the City's overall housing stock. However, implementation of the proposed project would not represent significant growth in housing in the context of the City as a whole. The number of households in the City is projected to increase by 54,020 between 2010 and 2030.¹ The maximum of 262 housing units proposed in the project would represent less than 1.0 percent (0.5 percent) of the projected household growth in the City between 2010 and 2030, and a negligible percentage (0.05 percent) of the projected household growth in the region (504,600 households) between 2010 and 2030.

¹ ABAG, *Projections and Priorities 2009*, San Francisco Bay Area Population, Households, and Job Forecasts, p. 92.

The proposed project would increase net employment at the site by 31 jobs (15 new employees associated with the management and maintenance of the proposed 1481 Post Street building, and 10 new employees associated with the 2,460-gsf café, and 6 new employees associated with the fitness amenity in the proposed 1481 Post Street building). Because the total number of employees at the project site would increase, the proposed project would cause some growth in employment that would result in housing demand in the City or region. As described in more detail in the NOP/IS on pp. 49-50 (see **Appendix A** to this EIR), the maximum number of housing units that would be in demand as a result of the proposed project (approximately 26 housing units) would represent less than 1.0 percent (0.5 percent) of projected household growth in the City between 2010 and 2030, and a negligible percentage (0.005 percent) of projected household growth in the region between 2010 and 2030.

Approval of the proposed height and bulk limit increase from the existing 240-E Height and Bulk District to a 410-G Height and Bulk District would accommodate greater residential density on the project site than would otherwise be permitted. Approval of the proposed project provides no basis for assuming that there would be an increase in future development in the project vicinity beyond that already anticipated in the City's growth projections and accounted for in the various analyses in this document.

With respect to the proposed project under consideration in this EIR, the project site is located in an urban area that is already served by the City's municipal infrastructure and public services as well as retail and other services for residential uses. No expansion to municipal infrastructure or public services is included and none would be required to accommodate new development associated with the proposed project, either directly or indirectly. The proposed project would not result in development of new public services that would accommodate significant growth in the City or the region.

The proposed project would provide for high-density residential growth (up to approximately 262 units per acre) supported by existing community facilities, public services, transit service and infrastructure, and public utilities. To the extent that this growth would have been otherwise accommodated at other Bay Area locations, the proposed project would focus growth on an underused infill site near existing regional employment centers and existing and planned transit facilities, infrastructure, retail services, and cultural and recreational facilities.

The proposed project would contribute to meeting ABAG's regional housing objectives and would conform with ABAG's regional goals to focus growth and development by creating compact communities with a diversity of housing, jobs, activities and services; increasing housing

supply; and improving housing affordability by meeting the City's inclusionary affordable housing requirements.²

As discussed in more detail in the Initial Study on pp. 52-53 under Impact C-PH-1 (see **Appendix A** to this EIR), population increases attributable to the implementation of the proposed project in combination with reasonably foreseeable projects in the vicinity that would develop new residential units and intensify business and employment activity along the Van Ness Avenue and Geary Boulevard corridors would not contribute to a significant cumulative impact related to the direct or indirect inducement of substantial population growth. Based on the preceding discussion and analysis, the proposed project would not have a substantial growth-inducing impact, and no mitigation measures are necessary.

B. SIGNIFICANT UNAVOIDABLE IMPACTS

In accordance with § 21067 of CEQA and with § 15126(b) and § 15126.2(b) of the *CEQA Guidelines*, the purpose of this section is to identify significant environmental impacts that could not be eliminated or reduced to less-than-significant levels by implementation of mitigation measures included in the proposed project or identified in **Chapter 4, Environmental Setting, Impacts, and Mitigation**. This EIR finds that the proposed project would not result in any significant unavoidable impacts. The findings of significance in this EIR are subject to final determination by the San Francisco Planning Commission as part of the certification process for this EIR. If necessary, this chapter will be revised in the Final EIR to reflect the findings of the Planning Commission.

C. SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL IMPACTS

In accordance with § 21100 (b)(2)(B) of CEQA, and § 15126.2(c) of the *CEQA Guidelines*, an EIR must identify any significant irreversible environmental changes that could result from implementation of the proposed project. This may include current or future uses of non-renewable resources and secondary or growth-inducing impacts that commit future generations to similar uses. According to the *CEQA Guidelines*, irretrievable commitments of resources should be evaluated to assure that such current consumption is justified. The *CEQA Guidelines* describe three distinct categories of significant irreversible changes: 1) changes in land use that would commit future generations, 2) irreversible changes from environmental actions, and 3) consumption of nonrenewable resources. Each of these categories is discussed below in relation to the proposed project.

² ABAG administers the FOCUS program, in partnerships with MTC, BCDC, and BAAQMD. FOCUS is a regional development and conservation strategy that promotes more compact land use patterns in the Bay Area.

CHANGES IN LAND USE WHICH WOULD COMMIT FUTURE GENERATIONS

As described throughout this EIR, implementation of the proposed project would occur within an urbanized area and would entail the demolition of the existing parking structure and the common open space terrace, tennis courts and pool building that sit atop that structure and construction of a new 262-unit, 36-story, 398-foot-tall (416 feet tall including an 18-foot-tall mechanical penthouse), 437,500-gsf residential building, as well as a four-level subsurface parking garage. The major change on the project site under the proposed project would be related to the construction of a new high-rise residential tower and the introduction of new residential and retail (café) uses and intensification of the fitness center use on the project site. The project site is currently occupied and developed with residential, fitness center, and parking uses. Implementation of the proposed project would result in development intensification on the project site that would commit future generations living or working in San Francisco or visiting San Francisco to the environmental effects caused by the operation of the proposed new building for the duration of the life of the building. These environmental effects include an increase in residential population as discussed in this EIR and the Initial Study. Future generations could benefit from the addition of new linear open space in the form of a publicly accessible walkway that would facilitate midblock pedestrian passage between Post Street and Geary Boulevard. Future generations could eventually redevelop the project site and linear open space with other uses, if the proposed high-rise residential building with a café use were to no longer operate or were demolished pursuant to a subsequent development proposal. Therefore, the proposed project would not constitute a significant adverse effect on changes in land use which would commit future generations.

IRREVERSIBLE CHANGES FROM ENVIRONMENTAL ACTIONS

No significant irreversible environmental damage, such as an accidental spill or explosion of hazardous materials, is anticipated to occur with implementation of the proposed project. Compliance with federal, state and local regulations related to residential and retail uses and the mitigation measures identified in the Initial Study, Section E, Hazards and Hazardous Materials (see **Appendix A** to this EIR, pp. 126-135) would reduce the possibility that hazardous substances from the demolition, construction, and operation of the proposed project would cause significant and unavoidable environmental damage. The proposed project would have an estimated maximum depth of excavation for the basement garage levels and mat foundation of as much as 45 feet below the ground surface at the western portion of the project site. Generally, the site excavation for the proposed project would not substantially alter the topography of the project site.

No other irreversible permanent changes such as those that might result from construction of a large-scale mining project, hydroelectric dam, or other industrial project would result from development of the proposed project.

CONSUMPTION OF NONRENEWABLE RESOURCES

Consumption of nonrenewable resources includes increased energy consumption, conversion of agricultural lands to urban uses, and loss of access to mineral reserves. No agricultural lands would be converted and no access to mining reserves would be lost with construction of the proposed project.

Implementation of the proposed project would commit future generations to an irreversible commitment of energy resources in the form of usage of nonrenewable fossil fuels, due to vehicle and equipment use during demolition, construction, and operation of the proposed project. The proposed project would comply with California Code of Regulations Title 24 standards and the City's Building Code Requirements for Construction Projects; it would not use energy in a wasteful manner. Resources consumed during demolition, construction, and operation would include lumber, concrete, gravel, asphalt, masonry, metals, and water.

The proposed project would introduce new residential and retail land uses and an expanded fitness center that would irreversibly use water resources and landfill capacity. However, the proposed project would not involve a large commitment to those resources relative to supply, nor would it consume any of those resources wastefully. The proposed project would be designed and constructed with the goal of obtaining, at minimum, Leadership in Energy and Environmental Design (LEED) Gold or equivalent sustainability standards, or as required by the San Francisco Building Code. Design, construction, and operation according to LEED standards would ensure the efficient use of water, energy, and materials resources. The Planning Department has determined that the proposed project would comply with all relevant requirements of San Francisco's *Strategies to Address Greenhouse Gas Emissions*. See the NOP/IS (**Appendix A** to this EIR) pp. 78-85. Further, the proposed project would not require the construction of a new power plant, or major new transmission lines to deliver energy.

The project site is already served by existing utilities and construction of new major utilities would not be necessary. The project site is almost completely covered with impervious surfaces, and construction of the proposed project would not substantially increase the amount of impervious surface area on the project site. It is anticipated that there would be no net increase in the amount of stormwater runoff with implementation of the proposed project because the City's Stormwater Management Ordinance requirements now make mandatory a reduction in at-source runoff. The proposed project would meet these requirements; however, the majority of stormwater would continue to be handled by the City's combined sewer collection system. The

proposed project would not require construction of new water or wastewater conveyance or treatment facilities. The *2010 Urban Water Management Plan for the City and County of San Francisco*, which includes all known or expected development projects and projected development in San Francisco through 2030, accounts for development like the proposed project. Therefore, the proposed project would not require new or expanded water supply resources or entitlements. In summary, service providers would have the capacity to provide for the proposed level of development on the project site.

D. AREAS OF KNOWN CONTROVERSY AND ISSUES TO BE RESOLVED

An Environmental Evaluation application for the 1333 Gough/1481 Post Street project was submitted to the Planning Department on July 15, 2005. This application was revised on May 23, 2012 to accommodate revisions to the proposed project's program and design. The Planning Department prepared an Initial Study and published a Notice of Preparation of an EIR on June 12, 2013, announcing its intent to prepare and distribute a focused EIR (the NOP/IS is presented as **Appendix A** to this EIR). Publication of the NOP/IS initiated a 30-day public review and comment period that began on June 12, 2013, and ended on July 12, 2013. Individuals and agencies that received these notices included owners of properties within 300 feet of the project site, and potentially interested parties, including regional and state agencies. During the public review and comment period, approximately 75 comment letters were submitted to the Planning Department by interested parties. On the basis of public comments on the NOP/IS, potential areas of controversy for the proposed project include the following (see **Chapter 1, Introduction**, pp. 1.4-1.11, for a more detailed summary of issues raised by comments on the NOP/IS):

- **Project Description:** The duration of project construction period and its impact on nearby residents, especially senior citizens, and disclosure of renovations to the 1333 Gough Street Building.
- **Plans and Policies:** The proposed zoning amendment to reclassify the existing 240-E height and bulk limit for the project site to a 410-G height and bulk limit; the proposed amendment to the existing PUD to allow exceptions to applicable provisions of the Planning Code governing rear yard depth and dwelling unit exposure; the ongoing planning effort for the area under the Japantown Cultural Heritage and Economic Sustainability Strategy; and consistency with the City's "Transit First" policy.
- **Land Use and Land Use Planning:** Potential effects resulting in a physical division of an established community; conflicts with Land Use Plans and Policies; impacts on existing land use character; the proximity of the proposed 1481 Post Street building to the neighboring Sequoias complex; and intensification of the residential dwelling unit density.
- **Aesthetics:** Potential effects on private views from nearby residences; impacts on scenic views of and from Cathedral Hill and St. Mary's Cathedral; light and glare on residents of

1450 Post Street; reflected sunlight from the proposed new building. Under Public Resources Code Section 21099, which directs that aesthetic impacts of mixed-use residential infill projects located in transit priority areas are not considered impacts on the environment under CEQA, this EIR does not contain a discussion of the topic of Aesthetics.

- **Population and Housing:** Potential need to relocate patients at The Sequoias health center facility due to construction of the proposed project and need for on-site affordable housing.
- **Transportation and Circulation:** Potential impacts on existing traffic conditions in the area; concerns related to existing pedestrian safety issues at nearby intersections and midblock pedestrian crossings and potential hazards resulting from conflicts between vehicles and pedestrians at the proposed curb cut entrances/exits to and from the project site, particularly for seniors; emergency access to the neighboring Sequoias complex during project construction; the supply of parking in the area during project construction and operation; cumulative impacts on traffic operations and transit capacity during construction and operation, especially in combination with the approved CPMC Cathedral Hill medical campus; cumulative pedestrian safety issues under the proposed project combined with those of the approved CPMC Cathedral Hill medical campus.
- **Noise:** Potential impact of project construction noise and vibration on neighboring properties, particularly for senior residents of the retirement communities in the area and on The Sequoias health center facility near the west property line of the project site.
- **Air Quality:** Potential impacts of project construction related to air quality, particularly for senior residents of the retirement communities in the area and on The Sequoias health center facility near the west property line of the project site.
- **Greenhouse Gas Emissions:** Project contributions to greenhouse gas emissions.
- **Wind:** Potential wind impacts on public areas and on private property.
- **Shadow:** Potential shadow impacts on nearby streets and public open spaces and on nearby private property.
- **Geology and Soils:** Effects of project excavation and construction on the stability of the adjacent Sequoias property; adequacy of the *Preliminary Geotechnical Evaluation* in light of the updated 2013 California Building Code.
- **Hazards and Hazardous Materials:** Concern for the potential release of hazardous material during construction of the proposed project.
- **Other CEQA:** Concerns that the proposed increase in the height and bulk limits of the project site could encourage re-zoning of other sites in the area.
- **Alternatives:** Adequacy of the NOP/IS description of the alternatives to be analyzed in the EIR; consideration of an alternative in which all passenger and delivery vehicles would enter from, and exit to, Geary Boulevard; consideration of an alternative that would increase the distance between the project tower and the neighboring Sequoias complex; consideration of an alternate project site; and consideration of a code conforming alternative.

An additional area of controversy may emerge regarding the provisions of SB 743 as they relate to the proposed project and this EIR. SB 743, which amended the Public Resources Code to add § 21099, was signed by Governor Brown on September 27, 2013. (See pp. 4.A.1 to 4.A.3 for further discussion of SB 743 and Public Resources Code § 21099.) This was subsequent to the publication of the NOP/IS, which had indicated that this EIR would include a discussion of aesthetics-related impacts of the proposed project.

6. ALTERNATIVES

A. INTRODUCTION

Chapter 6 identifies alternatives to the proposed project and discusses the environmental effects associated with them in relation to those of the proposed project. No significant unavoidable impacts are identified for the proposed project in this EIR. As such, no analysis of alternatives to the proposed project is required under *CEQA Guidelines* §15126.6. However, alternatives are presented and analyzed in this EIR for the purpose of fostering informed decision making by presenting a range of alternatives that could lessen the less-than-significant impacts identified for the proposed project, while feasibly attaining most of the basic project objectives. The analysis of alternatives is intended to provide decision-makers additional information about the potential physical environmental effects of land use decisions and, consequently, a better understanding of the interrelationships among all of the environmental topics under evaluation.

This chapter identifies one of the alternatives as an environmentally superior alternative (i.e., the alternative that would result in the least adverse effect on the physical environment). It concludes with a discussion of alternatives that were considered but not analyzed further because they were rejected as infeasible or failed to meet the basic project objectives.

Four alternatives are evaluated in this chapter:

- Alternative A: No Project Alternative;
- Alternative B: Code-Compliant Alternative;
- Alternative C: Reduced Height Alternative; and
- Alternative D: Reduced Tower Footprint and Height Alternative.

Table 6.1: Comparison of the Proposed Project to Alternatives, shown below on p. 6.2, compares the main features of the proposed project to those of the alternatives.

B. ALTERNATIVE A: NO PROJECT ALTERNATIVE

CEQA Guidelines § 15126.6(e) requires that, among the project alternatives, a “no project” alternative be evaluated. “The purpose of describing and analyzing a no project alternative is to allow decisionmakers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project.” *CEQA Guidelines* § 15126.6(e)(2) requires that the no project alternative analysis “discuss the existing conditions...as well as what would be

Table 6.1: Comparison of the Proposed Project to Alternatives

	Proposed Project (New Construction)	Alternative A No Project (Existing Conditions)	Alternative B Code-Compliant (New Construction)	Alternative C Reduced Height (New Construction)	Alternative D Reduced Tower Footprint and Height (New Construction)
Description					
Building Height (a)	398 ft.	138 ft.	240 ft.	240 ft.	240 ft.
Stories	36	14	25	25	24
Minimum Tower Setbacks (Lower Portion / Upper Portion)					
from Post Street	20 ft. / 40 ft.	Not Applicable	15 ft. / 26 ft.	15 ft. / 26 ft.	43 ft. / 43 ft. (b)
from Geary Blvd.	10 ft. / 46 ft.	Not Applicable	49 ft. / 60 ft.	0 ft. / 60 ft.	43 ft. / 43 ft. (b)
from West Property Line	10 ft. / 12 ft.	Not Applicable	0 ft. / 5 ft.	10 ft. / 10 ft.	40 ft. / 40 ft. (b)
from 1333 Gough St. Bldg.	0 ft. / 41 ft.	Not Applicable	5 ft. / 56 ft.	51 ft. / 51 ft.	46 ft. / 46 ft. (b)
Residential Units					
1 Bedroom/Studio	136	104	142	164	115
2 Bedroom	86	65	61	75	46
3 Bedroom	36	0	22	23	26
4 Bedroom	4	0	0	0	0
Total Units	262 units	169 units	225 units	262 units	187 units
GSF by Use					
Residential	437,500 gsf	214,400 gsf	355,320 gsf	401,600 gsf	320,380 gsf (c)
Café	2,230 gsf	None	None	None	None
Parking	180,000 gsf	65,100 gsf	147,240 gsf	163,600 gsf	147,500 gsf
Fitness Center	8,000 gsf	4,700	None	None	None
Total GSF	627,730 gsf	284,200 gsf	502,560 gsf	565,200 gsf	467,880 gsf

Table 6.1: Comparison of the Proposed Project to Alternatives (continued)

	Proposed Project (New Construction)	Alternative A No Project (Existing Conditions)	Alternative B Code-Compliant (New Construction)	Alternative C Reduced Height (New Construction)	Alternative D Reduced Tower Footprint and Height (New Construction)
Parking, Bike, Loading					
Residential Spaces	431	169	394	431	356
Visitor Spaces	7	7	7	7	7
Car-share Spaces	4	None	4	4	4
Total Spaces	442 (d)	176	405 (e)	442 (f)	367(g)
Bicycle Parking Spaces (Class 1)	293	None	225	262	187
Bicycle Parking Spaces (Class 2)	18	None	11	13	9
Off Street Loading Spaces	2	None	2	2	2

Notes:

- (a) For the purposes of comparison of these alternatives, building heights presented in this row are measured under Planning Code § 260 and do not include mechanical penthouses and other exempted rooftop features.
- (b) The 24-story building under Alternative D does not include a podium feature. Under this alternative, 3-story townhouses would line Post Street and Geary Boulevard. The townhouses would each be set back from Post Street and Geary Boulevard by about 5 feet along their street frontages.
- (c) Under the Reduced Height and Tower Footprint Alternative, a 161-unit, 263,050-gsf residential tower would be constructed on the western portion of the project site and 26 townhouse structures, totaling about 57,330 gsf, would be constructed along the Post Street and Geary Boulevard frontages of the project site.
- (d) Under the proposed project, existing parking spaces within the existing parking garage structure at 1333 Gough Street would be demolished and replaced in a new 4-level, 442-space subsurface parking structure.
- (e) Under the Code-Compliant Alternative, a total of 405 parking spaces would be provided for existing residents of 1333 Gough and residents of the new building under this alternative in a combination of retained parking structures, retained surface parking, and a new subsurface parking garage construction. The portions of the existing parking structure directly to the north and south of the 1333 Gough Street building (64 spaces) and the existing 13 surface parking lots at the northeast and southeast corners of the project site would be retained and reused (for two 1333 Gough Street resident spaces, seven 1333 Gough Street visitor spaces, and four carshare spaces). The portion of the existing above-ground parking structure on the western portion of the project site, along with the tennis courts and pool building on its roof, would be demolished and a new 5-level, 328-space, subsurface parking garage would be constructed for residents of the new 1481 Post Street building under this alternative (225 spaces) and as

Notes, continued

6. Alternatives

	Proposed Project (New Construction)	Alternative A No Project (Existing Conditions)	Alternative B Code-Compliant (New Construction)	Alternative C Reduced Height (New Construction)	Alternative D Reduced Tower Footprint and Height (New Construction)
<p><i>Notes, continued</i></p> <p>replacement parking for the existing 1333 Gough Street resident parking spaces on the western portion of the project site that would be demolished under this alternative (103 spaces).</p> <p>(f) Under the Reduced Height Alternative, a total of 442 parking spaces would be provided for existing residents of 1333 Gough and residents of the new building under this alternative in a combination of retained parking structures, retained surface parking, and a new subsurface parking garage. The portions of the existing parking structure directly to the north and south of the 1333 Gough Street building (64 spaces) and the existing 13 surface parking spaces at the northeast and southeast corners of the project site would be retained and reused (for two 1333 Gough Street resident spaces, seven 1333 Gough Street visitor spaces, and four carshare spaces). The portion of the existing above-ground parking structure on the western portion of the project site, along with the tennis courts and pool building on its roof, would be demolished and a new 5-level, 365-space, subsurface parking garage would be constructed for residents of the new 1481 Post Street building under this alternative (262 spaces) and as replacement parking for the existing 1333 Gough Street resident parking spaces on the western portion of the project site that would be demolished under this alternative (103 spaces).</p> <p>(g) Under the Reduced Tower Footprint and Height Alternative, existing parking spaces within the existing parking garage structure at 1333 Gough Street would be demolished and replaced in a new 3-level, 367-space subsurface parking structure.</p>					

Source: Turnstone Consulting

reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and policies and consistent with the available infrastructure and community services.” As noted in *CEQA Guidelines* § 15126.6, an EIR on “a development project on identifiable property” typically analyzes a no project alternative, i.e., “the circumstance under which the project does not proceed. Such a discussion would compare the environmental effects of the property remaining in its existing state against environmental effects that would occur if the project is approved. If disapproval of the project under consideration would result in predictable actions by others, such as the proposal of some other project, this ‘no project’ consequence should be discussed.”

DESCRIPTION

Under Alternative A, No Project, the existing conditions at the project site would not change. The existing residential building on the project site at 1333 Gough Street (169 units, 14 stories, about 138 feet tall, and 214,400 gsf), parking garage structure (163 spaces, 65,100 gsf) and two surface parking lots (13 spaces), and fitness center (4,700 gsf, 2 outdoor tennis courts atop the parking structure), would be maintained in their current condition.

The proposed 262-unit, 36-story, 398-foot-tall (416 feet tall including an 18-foot-tall mechanical penthouse), 437,500-gsf residential building at 1481 Post Street, the proposed 2,230-gsf café, and the proposed subsurface parking garage (about 180,000 gsf, 442 spaces total) would not be constructed. The existing fitness center and lobby at the ground floor of 1333 Gough Street would not be renovated, the proposed indoor swimming pool addition (about 8,000 gsf) would not be constructed, and the proposed pedestrian walkway at the western end of the project site would not be constructed. The project site would not be rezoned and the existing 240-E Height and Bulk District would remain. The No Project Alternative does not preclude potential future development of the project site with a range of land uses that are permitted at the project site.

IMPACTS

This environmental analysis assumes that the existing structure and uses on the project site would not change and that the existing physical conditions, as described in detail for each environmental topic in **Chapter 4, Environmental Setting, Impacts, and Mitigation**, would remain the same.

If the No Project Alternative were implemented, none of the impacts associated with the proposed project, as described in Chapter 4, would occur. However, development and growth would continue within the vicinity of the project site as reasonably foreseeable, future projects are

approved, constructed, and occupied.¹ These projects could contribute to significant cumulative impacts in the vicinity, but under the No Project Alternative, land use activity on the project site would not contribute to these cumulative impacts beyond existing levels.

Land Use and Land Use Planning

Under the No Project Alternative, existing land use conditions on the project site would not change. The existing residential building at 1333 Gough Street would not undergo any improvements. No new residential, retail, health club, below-grade parking, or open space uses would be developed on the project site, and none of the project approvals required for the proposed project would be required for this alternative. As with the proposed project, this alternative would not physically divide an established community or have an adverse impact upon the existing character of the project vicinity. Unlike the proposed project, this alternative would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect. Compared to the proposed project, which would have a less-than-significant project-level land use impact and a less-than-significant cumulatively considerable contribution to significant cumulative land use impacts, the No Project Alternative would not have any impacts related to land use and land use planning.

Transportation and Circulation

Under the No Project Alternative, existing conditions on the project site would not change. The existing residential building on the project site at 1333 Gough Street, the parking garage structure and surface lots, and the fitness center would continue to operate in their current condition. Under the No Project Alternative, the proposed pool addition would not be constructed south of the 1333 Gough Street building, as in the proposed project or its variants, nor would improvements be provided on the Post Street, Gough Street, and Geary Boulevard sidewalks, as in the proposed project or Variants A and B. The existing driveways on Geary Boulevard and Gough Street at the southeast corner of the project site, which provide access to the existing 1333 Gough Street building, would remain. The curb cut for the Gough Street driveway at the northeast corner of the project site would not be modified, as in the proposed project or its variants.² These thru driveways would continue to be used to provide access to the structured and surface parking for the residents and visitors of 1333 Gough Street, and current loading

¹ As described on pp. 4.A.6-4.A-7, reasonably foreseeable probably future projects include 1433 Bush Street, 1527-1545 Pine Street, 1634-1690 Pine Street, 1101 Van Ness Avenue/1255 Post Street (California Pacific Medical Center Cathedral Hill Campus), 1800 Van Ness Avenue/1749 Clay Street, Geary Bus Rapid Transit (BRT) Project, Van Ness BRT Project, Transit Effectiveness Project, and Japantown Cultural Heritage and Economic Sustainability Strategy.

² Under Variant C the Gough Street driveway at the northeast corner of the project site would not be modified.

operations would remain in effect. Unlike the proposed project or its variants, under the No Project Alternative there would be no changes to traffic, transit, pedestrian, bicycle, loading, emergency vehicle access, or parking conditions compared to existing conditions. Therefore, compared to the proposed project or its variants, which would have less-than-significant transportation and circulation impacts, the No Project Alternative would not have any impacts related to transportation and circulation. The suggested transportation and circulation improvement measures identified for the proposed project or its variants in **Section 4.C, Transportation and Circulation (Improvement Measures I-TR-A**, pp. 4.C.41-4.C.42; **I-TR-B**, pp. 4.C.42-4.C.43; **I-TR-C**, p. 4.C.51; **I-TR-D**, pp. 4.C.51-4.C.52; **I-TR-E**, p. 4.C.52; **I-TR-F**, p. 4.C.54; **I-TR-G**, p. 4.C.58; **I-TR-H**, p. 4.C.58; and **I-TR-I**, pp. 4.C.63-4.C.64) would not be applicable.

Noise

Under the No Project Alternative, there would be no demolition or construction activities on the project site, and, consequently, no new sources of construction-related noise or vibration. No new operational noise would occur. Ambient noise levels would remain as under the existing conditions. The construction noise and vibration impacts and the mitigation measures identified for the proposed project (**M-NO-1: Construction Noise Control Measures**, pp. 4.D.26-4.D.27; **M-NO-2a: Minimize Vibration Levels During Construction**; and **M-NO-2b: Pre-Construction Assessment to Protect Structures from Ground Vibration During Below-Grade Work**, pp. 4.D.30-4.D.31) would not be applicable to this alternative. Therefore, compared to the proposed project, which would have less-than-significant project-level noise and vibration impacts and a less-than-significant cumulatively considerable contribution to significant cumulative noise and vibration impacts with mitigation, as described in **Section 4.D, Noise**, the No Project Alternative would have no impacts related to noise or vibration.

Air Quality

Under the No Project Alternative, new residential or other sensitive land uses would not be developed on the project site and there would be no demolition or construction activities. Consequently, new sources of air pollutants would not be added. Existing stationary sources of air pollution near the project site and major roadways contributing to air pollution in the project vicinity would remain as in existing conditions. Because potential construction air quality impacts that would occur under the proposed project would not occur under this alternative, the mitigation measure for a Construction Emissions Minimization Plan identified for the proposed project (**M-AQ-1: Construction Emissions Minimization Plan**, described on pp. 4.E.30-4.E.31) would not be applicable to this alternative. Therefore, compared to the proposed project, which would have less-than-significant project-level air quality impacts and a less-than-significant cumulatively considerable contribution to significant cumulative air quality impacts with

mitigation, as described in **Section 4.E, Air Quality**, the No Project Alternative would have no impacts related to air quality.

Wind

Under the No Project Alternative, there would be no change in existing wind conditions on or around the project site. The No Project Alternative would not result in the construction of any new buildings or structures that would intercept overhead wind currents, redirect them downward, and alter ground-level wind conditions. Compared to the proposed project, which would result in a less-than-significant project-level wind impact and a less-than-significant cumulatively considerable contribution to significant cumulative wind impacts, the No Project Alternative would have no impacts related to wind.

Shadow

Under the No Project Alternative, there would be no change in existing sunlight conditions on any of the nearby Recreation and Park Commission properties, privately owned publicly accessible open spaces (POPOs), or public sidewalks. The No Project Alternative would not cast net new shadow on the aforementioned open spaces or other public areas. Compared to the proposed project, which would result in a less-than-significant project-level shadow impact and a less-than-significant cumulatively considerable contribution to significant cumulative shadow impacts, the No Project Alternative would have no impacts related to shadow.

Other Topics

The Notice of Preparation/Initial Study (NOP/IS) and public scoping process concluded that the proposed project would have no impacts, less-than-significant impacts, or less-than-significant impacts with mitigation in the following analysis areas:

- Land Use and Land Use Planning (Physically Divide an Established Community, only);
- Population and Housing;
- Cultural and Paleontological Resources;
- Greenhouse Gas Emissions;
- Recreation;
- Utilities and Service Systems;
- Public Services;
- Biological Resources;
- Geology and Soils;
- Hydrology and Water Quality;

- Hazards/Hazardous Materials;
- Mineral/Energy Resources; and
- Agricultural and Forest Resources.

The No Project Alternative would result in no impacts related to any of the above-listed environmental topics, because this alternative would result in no changes to existing site conditions. Therefore, mitigation measures and improvement measure presented in the NOP/IS (**Mitigation Measure M-CP-2: Archaeological Testing, Monitoring, Data Recovery and Reporting; Mitigation Measure M-CP-3: Paleontological Resources Monitoring and Mitigation Program; Mitigation Measure M-HZ-2: Hazardous Building Materials Abatement**) would not be required under the No Project Alternative.

CONCLUSION

Under the No Project Alternative, the existing conditions at the project site would not change. The No Project Alternative would have no impacts related to land use and land use planning, transportation and circulation, noise, air quality, wind, and shadow. The No Project Alternative would have no impacts related to topics determined in the NOP/IS to be either less than significant or less than significant with mitigation under the proposed project.

Relationship to Project Objectives

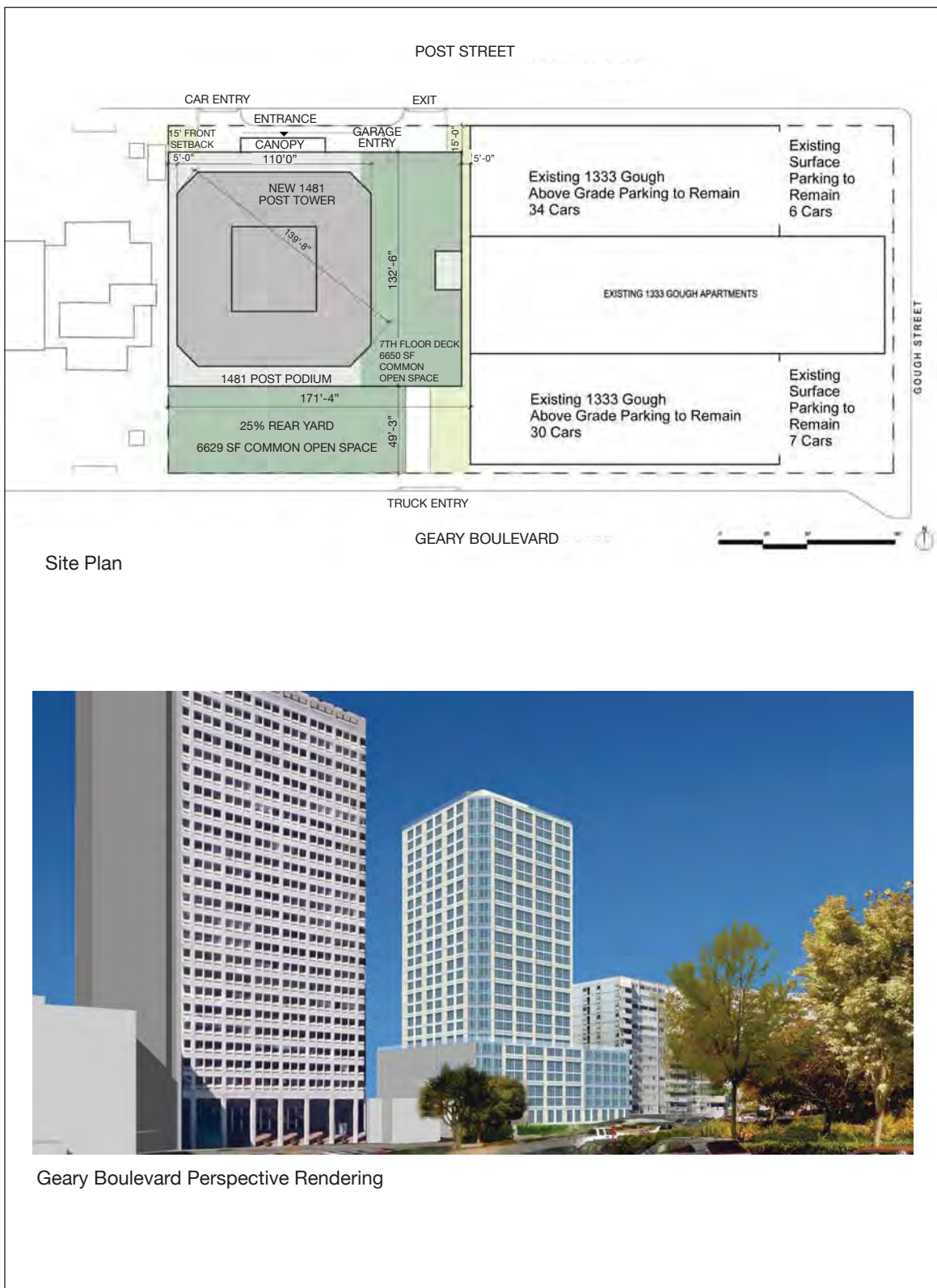
The No Project Alternative would not achieve any of the objectives of the project sponsor presented in **Chapter 2, Project Description**, on pp. 2.2-2.3.

C. ALTERNATIVE B: CODE-COMPLIANT ALTERNATIVE

DESCRIPTION

Alternative B: Code-Compliant Alternative provides a development alternative that meets all applicable provisions of the Planning Code with a 240-foot-tall, 25-story, 225-unit building. (See **Figure 6.1: Code-Compliant Alternative - Site Plan and Geary Boulevard Perspective Rendering**.) Under this alternative, the western portion of the existing 1333 Gough Street parking garage (and the existing two tennis courts and vacant pool building that sit atop this portion of the parking garage) would be demolished. A new residential building would be constructed on the western portion of the project site.

The project site would not be rezoned and the existing 240-E Height and Bulk District would remain. The building would conform to the limitations of the 240-E Height and Bulk District.



SOURCES: SLCE/MWA Architects

1333 GOUGH STREET/1481 POST STREET

2005.0679E

**FIGURE 6.1: CODE-COMPLIANT ALTERNATIVE -
SITE PLAN AND GEARY BOULEVARD PERSPECTIVE RENDERING**

The 240-E designation limits building height to 240 feet. Bulk controls in the “E” district become effective above a building height of 65 feet and limit plan dimensions to a maximum horizontal dimension of 110 feet, and a maximum diagonal measurement of 140 feet.

This alternative would be 25 stories tall and would be 158 feet lower than the 398-foot-tall (416 feet tall including an 18-foot-tall mechanical penthouse) 1481 Post Street building under the proposed project. The alternative would have a 6-story podium base that would be set back 15 feet from Post Street, 49 feet from Geary Boulevard, and 5 feet from the existing 1333 Gough Street building on the eastern portion of the project site. (See **Table 6.1** on pp. 6.2-6.4 for more information about building setbacks under each alternative, compared against those of the proposed project.) The podium would not be set back from the west property line of the project site shared with The Sequoias and, as such, would not provide a midblock pedestrian walkway between Post Street and Geary Boulevard. Above the sixth floor to the 25th floor, the tower shaft element would rise from the podium to a height of 240 feet. The tower element would be roughly square in plan, measuring 110 feet north-to-south and east-to-west. Diagonally, the tower element of this alternative would measure 139 feet, 8 inches.

Program

Under the Code-Compliant Alternative, the new 1481 Post Street building would contain 225 dwelling units (37 fewer units than under the proposed project). No café use would be included under this alternative. The existing 1333 Gough Street building would continue to include 169 residential units. No renovation of the 1333 Gough Street fitness center, or construction of a pool addition, would occur. The existing fitness center would continue to operate but the facility would no longer include the two existing tennis courts (the existing swimming pool building was permanently closed in 2010).

Parking and Site Access

Under this alternative, the portions of the existing parking structure directly to the north and south of the 1333 Gough Street building (64 spaces) and the existing 13 surface parking spaces (two 1333 Gough Street resident spaces, seven 1333 Gough Street visitor spaces, and four carshare spaces) at the northeast and southeast corners of the project site would be retained and reused. The portion of the existing above-ground parking structure on the western portion of the project site, along with the tennis courts and pool building on its roof, would be demolished and a new 5-level, 328-space, subsurface parking garage would be constructed for residents of the new 1481 Post Street building under this alternative (225 spaces) and as replacement parking for the existing 1333 Gough Street resident parking spaces on the western portion of the project site that would be demolished under this alternative (103 spaces). However, all parking spaces for

residents and visitors of 1333 Gough Street would be temporarily unavailable for about 12 months until the new subsurface parking garage could be occupied.

Site access for residents of the new 1481 Post Street building under this alternative would be similar to that described for the proposed project in **Chapter 2, Project Description**, on pp. 2.23-2.24. Passenger vehicles would enter the western portion of the project site from Post Street near the northwest corner of the project site and proceed to a passenger drop-off at the lobby entrance. Vehicles could proceed to a two-way ramp to the parking garage below. Vehicles would exit the site to Post Street through a curb cut east of the entrance curb cut.

Site access for residents of the existing 1333 Gough Street building would remain the same as under existing conditions, described on p. 2.5. The lobby entrance and passenger drop-off would be along Post Street at its existing location. Existing curb cuts at the northeast and southeast corners of the project site along Gough Street and Geary Boulevard would remain in place. However, the replacement parking spaces for residents of 1333 Gough Street that would be accommodated in the new subsurface parking garage would be accessed as described above for residents of the new 1481 Post Street Building.

This alternative would not preclude the installation of the midblock crosswalk nor reduce its functionality. Although it is assumed that this alternative would implement applicable improvements under the Better Streets Plan along the 1481 Post Street frontages along Post Street and Geary Boulevard, no changes would occur along the 1333 Gough Street frontages under this alternative, unlike the proposed project or its variants.

Loading for the new 1481 Post Street building and the existing 1333 Gough Street building would be similar to that described for proposed project on pp. 2.28-2.29. Delivery vehicles for both the new 1481 Post Street building under this alternative and the existing 1333 Gough Street building would access the project site from a curb cut entrance along Geary Boulevard and exit the project site onto Post Street. If a request to designate the curb space between the two driveways were approved, as for the proposed project, additional loading activities for 1481 Post Street could be accommodated on the street.

Discretionary Approvals

The Code-Compliant Alternative would require the following discretionary project approvals: determination by the Planning Commission and Recreation and Park Commission under Planning Code § 295 that new shadow being cast on Peace Plaza would not be adverse to the use of the park; Conditional Use authorization from the Planning Commission to construct a building exceeding a height of 50 feet in an RM-4 District; and approval by the Planning Commission of a Planned Unit Development (including amendments to the existing 1963 PUD as necessary).

Unlike the proposed project, no *General Plan* amendment or Planning Code amendment would be necessary to reclassify the existing 240-E height and bulk district and no exceptions to provisions of the Planning Code governing rear yard depth (Planning Code § 134), dwelling unit exposure (Planning Code § 140), and residential density (Planning Code § 209.1(1)) would be necessary under this alternative.

IMPACTS

Land Use and Land Use Planning

The 240-foot-tall Code-Compliant Alternative would include a mix of residential and parking uses. This alternative would not include retail uses or an expanded fitness center facility at 1333 Gough Street. Unlike the proposed project, the Code-Compliant Alternative would conform to existing Planning Code height and bulk controls and provisions governing rear yard depth and dwelling unit exposure. Like the proposed project, this alternative would not conflict with land use plans and policies adopted for the purpose of mitigating environmental effects.

Like the proposed project, this alternative would not adversely affect neighborhood character or cause adverse land use impacts. The impact of this alternative related to compatibility with surrounding character would be considered less than significant.

Like the proposed project, and for the same reasons presented under **Impact C-LU-1** on pp. 4.B.18-4.B.19, the Code-Compliant Alternative would not make a cumulatively considerable contribution to a significant impact related to land use and land use planning.

Transportation and Circulation

This subsection summarizes and incorporates by reference the *1333 Gough Street/1481 Post Street Project – Alternatives Assessment*, prepared by the transportation consultant.³ Under the Code Compliant Alternative, there would be 37 fewer residential units than in the proposed project or its variants (from 262 units to 225), and a change to the mix of units with an increase in the proportion of studio/one-bedroom units (from 52 percent of all proposed units in the proposed project or its variants to 63 percent under the Code-Compliant Alternative). Unlike with the proposed project or its variants, there would be no café/restaurant or expanded fitness center uses under the Code-Compliant Alternative. As a result, the number of weekday PM peak hour person and vehicle trips under the Code Compliant-Alternative would be substantially less than with the proposed project or its variants (see **Table 6.2: Trip Generation by Mode – Weekday PM Peak Hour, Proposed Project and Code-Compliant Alternative**).

³ LCW Consulting, Memo to Rachel Schuett Re: 1333 Gough Street/1481 Post Street Project – Alternatives Assessment, April 7, 2014. A copy of this document is available for review at the San Francisco Planning Department, 1650 Mission Street, Suite 400, as part of Case File No. 2005.0679.

Table 6.2: Trip Generation by Mode – Weekday PM Peak Hour, Proposed Project and Code Compliant Alternative

Project/Alternative	Person Trips				Total	Vehicle Trips
	Auto	Transit	Walk	Other ^a		
Weekday PM Peak Hour						
Proposed Project	190	187	83	42	502	150
Code Compliant Alternative	108	134	56	30	328	100

Note:

^a Other mode includes bicycles, motorcycles, and taxis

Sources: SF Guidelines 2002; 2000 U.S. Census; LCW Consulting, 2014

Under the Code-Compliant Alternative, vehicular ingress to, and egress from, the proposed subsurface parking garage that would serve the 1481 Post Street building would be from Post Street as with the proposed project or Variants A and C.⁴ The existing vehicular ingress to, and egress from, the surface parking and the retained portion of the existing parking structure that serve the residents and visitors of 1333 Gough Street building would not be changed, unlike the proposed project or its variants (i.e., both Gough Street driveways and the Geary Boulevard driveway would remain and a new Post Street driveway immediately west of Gough Street would not be provided). Unlike the proposed project or its variants, access to the parking spaces within the proposed subsurface parking garage intended to replace those lost as part of the demolition of the western portion of the existing structured parking would be from the proposed driveways for the 1481 Post Street building. As with the proposed project, the project sponsor would request that the curb between the inbound and outbound driveways on Pine Street be designated as a commercial loading space. The Code-Compliant Alternative would include two off-street loading spaces with access from Geary Boulevard in a service area/truck loading area proposed to serve both buildings as in the proposed project or its variants.

Traffic Impacts

As shown in **Table 6.2**, the Code-Compliant Alternative would generate fewer vehicle trips than the proposed project or its variants. During the weekday PM peak hour, the new uses associated with the Code-Compliant Alternative would generate about 100 vehicle trips compared to about 150 vehicle trips in the proposed project or its variants. With a reduction in the number of vehicles added to the study intersections, which operate at acceptable LOS conditions under existing conditions and Existing plus Project/Variant conditions, the traffic impacts of the Code-Compliant Alternative at these study intersections would be less than those with the proposed project or its variants. Furthermore, vehicular ingress to, and egress from, the proposed subsurface garage from Post Street under this alternative would not affect traffic operations on Post Street or Geary Boulevard similar to the proposed project or its variants. Therefore, the

⁴ Under Variant B site access would also be from Post Street but it would be from one, two-way driveway instead of two separate inbound and outbound driveways as in the proposed project or Variants A and C and the Code Compliant Alternative.

traffic impacts under this alternative would be less than significant, as with the proposed project or its variants.

While the Code-Compliant Alternative, like the proposed project or its variants, would result in a less-than-significant impact at the studied intersections, **Improvement Measures I-TR-A: Monitoring and Abatement of Queues and Conflicts** and **I-TR-B: Transportation Demand Management Plan**, identified for the proposed project or its variants and described on pp. 4.C.41-4.C.43, would also be applicable to this alternative to reduce its less-than-significant effect on traffic operations on adjacent streets.

Transit Impacts

As shown in **Table 6.2**, the Code-Compliant Alternative would generate fewer transit trips than the proposed project or its variants. During the weekday PM peak hour, the new uses associated with the Code-Compliant Alternative would generate about 134 transit trips compared to about 187 transit trips in the proposed project or its variants. With a reduction in the number of transit riders added to the local and regional transit screenlines and corridors, the impacts of the Code-Compliant Alternative on local and regional transit capacity utilization and Muni operations on adjacent streets would be less than significant, as with the proposed project or its variants.

While the Code-Compliant Alternative, like the proposed project or its variants, would result in less-than-significant regional and local transit impacts, **Improvement Measures I-TR-G: Coordination of Move-In/Move-Out Activities and Large Deliveries** and **I-TR-H: PM Peak Period Off-Street Loading Access Restrictions**, identified for the proposed project or its variants and described on p. 4.C.58, would also be applicable to this alternative to lessen its effect on transit operations on adjacent streets.

Pedestrian Impacts

The Code-Compliant Alternative would generate fewer pedestrian trips than the proposed project or its variants. During the weekday PM peak hour, the new uses associated with the Code-Compliant Alternative would generate about 220 pedestrian trips compared to about 312 pedestrian trips in the proposed project or its variants. With a reduction in the number of pedestrians added to the local pedestrian network and the number of vehicles accessing the project site under this alternative, impacts related to pedestrian LOS conditions on adjacent sidewalks and crosswalks at the intersection of Gough Street/Geary Boulevard and the potential for pedestrian-vehicle conflicts would be less than for proposed project or its variants. This alternative would not substantially affect pedestrian flows on Post and Gough streets or Geary Boulevard, create potentially hazardous conditions for pedestrians or otherwise interfere with

pedestrian accessibility to the site and adjoining areas. Therefore, as with the proposed project or its variants, pedestrian impacts under this alternative would be less than significant.

This alternative would not change sidewalk widths along the perimeter of the 1333 Gough Street portion of the project site. While the Code-Compliant Alternative, like the proposed project or its variants, would result in less-than-significant pedestrian impacts, **Improvement Measures I-TR-C: Fund the Design and Implementation of Upgraded Crosswalks at Two Intersections in Project Vicinity, I-TR-D: Fund the Design and Implementation of Pedestrian Countdown Signals at Two Intersections in Project Vicinity, and I-TR-E: Contribute to the Cost of Design and Implementation of Pedestrian-Actuated Flashing Beacons at the Existing Midblock Crosswalk on Post Street between Laguna and Gough Streets**, identified for the proposed project or its variants and described on pp. 4.C.51-4.C.52, would also be applicable to this alternative to lessen its effect related to pedestrians.

Bicycle Impacts

The Code-Compliant Alternative would provide 225 Class 1 and 11 Class 2 bicycle parking spaces, and like the proposed project or its variants, would meet the Planning Code requirements. Unlike the proposed project or its variants for the proposed 1481 Post Street building, which provide Class 1 and Class 2 bicycle parking spaces for café/restaurant uses, under this alternative none would be provided since there would be no retail uses. In addition, this alternative would not provide 30 Class 1 bicycle parking spaces for 1333 Gough Street unlike as with the proposed project or its variants. Similar to the proposed project or its variants, Class 1 bicycle parking spaces would be located on the first basement level with access from Post Street via the garage ramp or elevator shuttle under this alternative. No new bicycle parking facilities would be provided at 1333 Gough Street, unlike the proposed project or its variants. Similar to the proposed project or its variants, the Code-Compliant Alternative would result in an increase in the number of vehicles and bicycles in the vicinity of the project site; however, this increase would not be substantial enough to affect bicycle travel or facilities in the area. The Code-Compliant Alternative would not substantially change bicycle travel in the vicinity of the project site, and therefore, similar to the proposed project or its variants, impacts on bicyclists would be less than significant.

While the Code-Compliant Alternative, like the proposed project or its variants, would result in less-than-significant bicycle impacts, **Improvement Measure I-TR-F: Additional Bicycle Parking for the 1333 Gough Street Building**, identified for the proposed project or its variants and described on p. 4.C.54, would also be applicable to this alternative to encourage bicycle use to and from the project site.

Loading Impacts

As described above, the Code-Compliant Alternative would provide two off-street loading spaces with access from Geary Boulevard, similar to the proposed project or its variants. As with the proposed project, the project sponsor would request that the existing curb on Post Street (approximately 60 feet) between the inbound and outbound driveways for the 1481 Post Street building be designated a commercial loading space under the Code-Compliant Alternative. Compared to the proposed project or its variants, there would be fewer residential units, no café/restaurant space, and no fitness center renovation or expansion under this alternative; therefore, loading demand would be less than with the proposed project or its variants. Since the Code-Compliant Alternative would provide off-street loading, and because the loading demand could be accommodated on site and at the proposed metered commercial loading space, loading impacts under this alternative would be less than significant, as with the proposed project or its variants.

While the Code-Compliant Alternative, like the proposed project or its variants, would result in less-than-significant loading impacts, **Improvement Measures I-TR-A: Monitoring and Abatement of Queues and Conflicts, I-TR-G: Coordination of Move-In/Move-Out Activities and Large Deliveries, and I-TR-H: PM Peak Period Off-Street Loading Access Restrictions**, identified for the proposed project or its variants and described on pp. 4.C.41-4.C.42 and p. 4.C.58, would also be applicable to this alternative to lessen the effect of loading operations on traffic and transit operations.

Emergency Access Impacts

As with the proposed project or its variants, the Code-Compliant Alternative would not change the configuration or capacity of the travel lanes adjacent to the project site. Therefore, it would not affect emergency vehicle access to the project site or project vicinity. Similar to the proposed project or its variants, the impacts of the Code-Compliant Alternative on emergency access would be less than significant.

Construction Impacts

Construction activities associated with the Code-Compliant Alternative would be similar to those described for the proposed project or its variants. Under this alternative construction would occur over a period of approximately 26 months, 1 month shorter than the 27-month construction period for the proposed project or its variants. As with the proposed project or its variants, construction-related transportation impacts would be less than significant under this alternative due to their temporary and limited duration. While the construction-related transportation impacts under this alternative would be less than significant, particularly since this alternative would involve less on-

site development compared to the proposed project or its variants, **Improvement Measure I-TR-I: Construction Measures**, identified for the proposed project or its variants and described on pp. 4.C.63-4.C.64, would also be applicable to this alternative to reduce its less-than-significant construction-related transportation effects.

Parking Information

Table 6.3: Vehicle Parking Supply and Demand Comparison Proposed Project and Code-Compliant Alternative presents the parking supply and demand comparisons for the overnight and midday periods for the proposed project or its variants and the Code-Compliant Alternative. Midday residential parking demand would be approximately 80 percent of the overnight demand.

Table 6.3: Vehicle Parking Supply and Demand Comparison Proposed Project and Code-Compliant Alternative

Project/Alternative and Period	Supply	Demand	(Shortfall)/Surplus
Midday			
Proposed Project	262	295	(33)
Code-Compliant Alternative	225	225	0
Overnight			
Proposed Project	262	339	(77)
Code-Compliant Alternative	225	281	(56)

Source: SF Guidelines 2002, LCW Consulting, 2014.

As shown in **Table 6.3**, the Code-Compliant Alternative would not result in any unmet parking demand during the midday period, because unlike the proposed project or its variants, this alternative would not include any café/restaurant or net-new fitness center space. As with the proposed project or its variants, this alternative would have an unmet parking demand during the overnight period (98 unmet spaces in the proposed project, 116 spaces under each of the variants, and 56 spaces under the Code-Compliant Alternative).⁵ This alternative would not have as substantial an unmet overnight parking demand as the proposed project or its variants due to the smaller number of residential units proposed under this alternative.

As with the proposed project or its variants, some drivers would need to park elsewhere in the area (either on-street or within the Japan Center Garage), which would increase the overnight parking occupancy in the area. Due to difficulty in finding on-street parking in the study area, some drivers may park outside of the study area, switch to transit, carpool, bicycle or other forms of travel. As with the proposed project or its variants, the Code-Compliant Alternative's unmet

⁵ This total includes the number of on-street spaces that would be eliminated as a result of the sidewalk widening under the proposed project (21 spaces) and the expansion of that sidewalk widening under each of the variants (39 spaces). The Code-Compliant Alternative would eliminate fewer on-street parking spaces than the proposed project or its variants because the corner bulbs at Post and Gough streets and at Gough Street and Geary Boulevard would not be included, as in the proposed project, and the sidewalk widening in the variants would not occur.

overnight parking demand would not be substantial and could be accommodated on-street or in other off-street parking facilities, and the area is well served by public transit and other modes. Therefore, similar to the proposed project or its variants, the unmet parking demand would not create hazardous conditions or significant delays affecting traffic, transit, bicycles or pedestrians under this alternative; however, to encourage transit use and reduce parking demand,

Improvement Measure I-TR-B: Transportation Demand Management Plan, identified for the proposed project or its variants and described on pp. 4.C.42-4.C.43, would also be applicable to the Code-Compliant Alternative.

2040 Cumulative Conditions

As shown in **Table 6.3** the Code-Compliant Alternative would generate fewer vehicle trips than would the proposed project or its variants. Under 2040 Cumulative conditions, vehicle delays under the Code-Compliant Alternative would increase at the study intersections compared to existing conditions, and, as under the proposed project or its variants, all study intersections would operate at LOS D or better during the weekday AM and PM peak hours except the Franklin/O'Farrell intersection (weekday PM peak hour only), which would operate at LOS E under 2040 Cumulative conditions. Like the proposed project or its variants, this alternative would result in a less-than-cumulatively-considerable-contribution to significant cumulative impacts at the intersection that operates at LOS E, based on consideration of the alternative's contribution to the critical northbound through/right movement. Therefore, the Code-Compliant Alternative's traffic impacts under 2040 cumulative conditions at the study intersections would be less than cumulatively considerable since its contribution to the critical movement would be less than for the proposed project or its variants.

In summary, similar to the proposed project or its variants, under the Code-Compliant Alternative there would be less than significant project-level impacts and no cumulatively considerable contribution to significant cumulative impacts related to transportation.

Noise

The Code Compliant Alternative would result in demolition, excavation, and building construction activities that would occur over a total period of approximately 26 months, 1 month shorter than the 27-month total construction period with the proposed project. As with the proposed project, these activities would temporarily and intermittently increase noise and groundborne vibration in the project vicinity to levels that could be considered an annoyance by occupants of nearby properties, although noise and vibration levels would vary greatly and be limited to the duration of the various construction phases. As with the proposed project, the greatest construction noise and vibration impacts would occur during the demolition, excavation, and basement construction phases (the first 10 months under this alternative).

The greatest impacts would be experienced by the residences at 1333 Gough Street and at the health center facility at 1400 Geary Boulevard (The Sequoias), immediately adjacent to the project site and within a building that is 6 feet, 8 inches from the west property line at its closest point. As with the proposed project, demolition, excavation and shoring, and other below-grade work would occur at the western property line. In contrast with the proposed project, slightly lower noise and vibration levels would occur at 1333 Gough Street and other receptors east of the site because there would be less demolition and renovation of the eastern portion of site under this alternative.

Construction activities would be required to comply with the San Francisco Noise Ordinance. However, as with the proposed project, noise from construction would still be substantially greater than existing noise levels in the project vicinity, would not meet the requirements of the Noise Ordinance related to construction noise, and could significantly impact nearby sensitive receptors. To ensure construction noise is reduced to the maximum amount feasible and meet the construction noise requirements in the Noise Ordinance, **Mitigation Measure M-NO-1: Construction Noise Control Measures**, identified for the proposed project and described in **Section 4.D, Noise**, pp. 4.D.26-4.D.27, would also be applicable under this alternative. **Mitigation Measure M-NO-1** would require the project contractor to use equipment with lower noise emissions and sound controls where feasible and locate stationary equipment as far as possible from sensitive receptors.

On-site receptors and those at The Sequoias at 1400 Geary Boulevard would be exposed to construction vibration at levels that could exceed the thresholds of annoyance and, conservatively, could cause potential structural damage, similar to the proposed project. To reduce the impact of construction vibration to the maximum amount feasible, mitigation would also be necessary, similar to the proposed project. **Mitigation Measure M-NO-2a: Minimize Vibration Levels During Construction** would mitigate the impact of human annoyance by providing a community liaison to respond to and address complaints, by requiring protective techniques during demolition, and by phasing activities where feasible. To conservatively protect buildings within 10 feet of project demolition, excavation and shoring, and other below-grade work, **Mitigation Measure M-NO-2b: Pre-Construction Assessment to Protect Structures from Ground Vibration During Below-Grade Work** would require a preconstruction assessment, use of smaller equipment for some excavation and, if needed, shoring of adjacent structures and monitoring during vibration-causing activities to detect ground settlement or lateral movement of structures. As with the proposed project, implementation of these mitigation measures under this alternative would decrease significant project-level construction noise and vibration impacts to less-than-significant levels.

As with the proposed project, noise generated during construction of the Code-Compliant Alternative could combine with construction noise from the proposed Geary Bus Rapid Transit

(BRT) project which would likely employ construction equipment such as jackhammers for pavement breaking, bulldozers for grading, and heavy trucks for material hauling. The construction activities associated with the proposed Geary BRT project along the adjacent segment of Geary Boulevard would include the repair, replacement, and/or other modifications to the road surface, curbs, or utilities and construction of BRT stations in the public right-of-way. Construction activities for the Geary BRT project would be required to comply with the Noise Ordinance and would be subject to enforcement of the Noise Ordinance by Department of Public Works (DPW) and the Police Department. However, if the construction phases for the proposed Geary BRT project were to overlap with those of the Code-Compliant Alternative, the closest noise-sensitive receptors could experience significant temporary or periodic cumulative increases in ambient noise. As with the proposed project, implementation of **Mitigation Measures M-NO-1, M-NO-2a, and M-NO-2b** under this alternative would reduce a potentially cumulatively considerable contribution to cumulative construction-related noise and vibration impacts to a less-than-significant level.

Operation of the Code-Compliant Alternative would introduce additional mobile and fixed noise sources to the area, i.e., new vehicle trips and new mechanical equipment for building utilities, including ventilation equipment (HVAC equipment) and other building mechanical systems. Rooftop mechanical equipment under this alternative would be located at a height of 240 feet, rather than at a height of 398 feet under the proposed project, increasing the potential for operational noise impacts on neighboring properties. Noise generated by stationary equipment would be required to comply with the San Francisco Noise Ordinance, which requires that equipment operating on residential property not produce a noise level more than 5 dBA above the ambient noise level at the property line or its plane.

Under the Code-Compliant Alternative, there would be fewer net new vehicle trips than with the proposed project because there would be fewer residential units, no retail, and no expansion of the fitness center. Thus, the increase in traffic noise levels in the project vicinity under this alternative would be less than that under the proposed project.

As with the proposed project, there would be less-than-significant project-level operational noise impacts and no cumulatively considerable contribution to significant cumulative operational ambient noise levels under this alternative.

As with the proposed project, new residential uses under this alternative would be required to incorporate acoustical insulation or other equivalent measures to reduce interior noise levels to comply with applicable standards under Title 24 and the *San Francisco General Plan Land Use Compatibility Guidelines for Community Noise*. Thus, as with the proposed project, there would be no significant project-level noise impacts or cumulatively considerable contribution to significant cumulative noise impacts on new residents under this alternative.

Air Quality

Similar to the proposed project, the Code-Compliant Alternative would result in demolition, excavation, and building construction activities that would cause emissions of criteria air pollutants that would affect local air quality. Activities that create dust would be subject to the Construction Dust Control Ordinance. The construction activities, equipment, and phasing under this alternative would be similar to those of the proposed project. However, construction-related emissions under this alternative would be slightly less than those under the proposed project due to the reduction in the number of construction truck trips necessary to haul excavated materials off-site (from 83,000 cubic yards under the proposed project to 55,400 cubic yards under this alternative). This alternative would result in construction emissions of criteria air pollutants that would be above the applicable significance thresholds, requiring mitigation, as under the proposed project. Toxic air contaminants (TACs) emitted during construction would not expose sensitive receptors to substantial pollutant concentrations, as under the proposed project.

Implementation of **Mitigation Measure M-AQ-1: Construction Emissions Minimization Plan**, identified for the proposed project and described on pp. 4.E.30-4.E.31, would be applicable to this alternative. This mitigation measure, which calls for the development of a construction emissions minimization plan, would reduce construction emissions and the construction-related emissions impacts of this alternative on nearby sensitive receptors to a less-than-significant level.

Due to fewer residential units and no retail or expanded health club uses, operational emissions for the Code-Compliant Alternative would be similar to, but less than, those of the proposed project. Sources of operational emissions for this alternative would include a back-up emergency generator, other mechanical systems, and new motor vehicle trips with emissions from mobile sources. The emissions from mobile sources would be slightly less than those of the proposed project, because of the lower travel demand from fewer residential units under this alternative. As with the proposed project, the project sponsor would be required to obtain applicable permits to operate an emergency generator from the BAAQMD. Thus, operational criteria air pollutant emissions would be below the thresholds of significance and would not violate any air quality standard or contribute substantially to a violation of a standard.

Under this alternative, as with the proposed project, the new residential land use would be developed in an area that does not experience high levels of air pollution. Thus, this alternative would result in a less-than-significant impact with respect to exposing sensitive receptors to substantial pollutant concentrations.

As with the proposed project, the Code-Compliant Alternative would not conflict with or obstruct implementation of the applicable air quality plan, and this alternative would not expose a substantial number of people to objectionable odors.

Project-level criteria air pollutant emissions at levels below the thresholds are not anticipated to contribute to an air quality violation or result in a cumulatively considerable net increase in criteria air pollutants. No additional mitigation would be necessary for cumulative air quality impacts. Similar to the proposed project, construction or operation of this alternative, in combination with other reasonably foreseeable projects in the project vicinity, would not expose sensitive receptors to substantial pollutant concentrations. Therefore, as with the proposed project, there would be less-than-significant (with mitigation incorporated) project-level impacts and no cumulatively considerable contribution to significant cumulative impacts related to air quality under the Code-Compliant Alternative.

Wind

Like the proposed project, the 240-foot-tall Code-Compliant Alternative was tested in an atmospheric boundary layer wind tunnel. This alternative would not result in substantial changes to ground-level wind conditions in the project vicinity. Under this alternative, the average wind speed at the 54 test points would remain substantially unchanged from existing conditions at around 12 mph, the number of exceedances of the wind comfort criterion would decrease from 30 to 29, and there would be no exceedances of the wind hazard criterion. Under this alternative, the exceedances of the wind comfort criterion would be in the same general locations as those that would occur under the proposed project. As with the proposed project, this alternative would result in winds on the south side of Geary Boulevard that approach but would not exceed the wind hazard criterion. Like the proposed project, the Code-Compliant Alternative would have a less-than-significant project-level wind impact and a less-than-significant cumulatively considerable contribution to significant cumulative wind impacts.

Shadow

The 240-foot-tall Code-Compliant Alternative, which is 158 feet shorter than the proposed project, would result in reduced shadow impacts when compared to the proposed project. This alternative would shadow two parks, whereas the proposed project would shadow six parks. The Code-Compliant Alternative would shadow Peace Plaza, Cottage Row Mini Park, and public sidewalks in the project vicinity at the same time of day and during the same times of year as would the proposed project. This alternative would not shadow four parks (the Hamilton Recreation Center, Raymond Kimbell Playground, Gene Suttle Plaza, and Fillmore Center Plaza) that would be shadowed by the proposed project. Regarding the two parks that would be shadowed by this alternative, the net new shadow from this alternative would cover the same general areas as the net new shadow from the proposed project. Depending on the time of day, the duration of the net new shadow would be shorter under this alternative due to its reduced height (i.e., the shorter building height would result in a shorter shadow that would move off the park sooner than a longer shadow). Like the proposed project, the Code-Compliant Alternative

would have a less-than-significant project-level shadow impact and a less-than-significant cumulatively considerable contribution to significant cumulative shadow impacts.

Other Topics

The NOP/IS and public scoping process concluded that the proposed project would have no impacts, less-than-significant impacts, or less-than-significant impacts with mitigation in the following analysis areas:

- Land Use and Land Use Planning (Physically Divide an Established Community, only);
- Population and Housing;
- Cultural and Paleontological Resources;
- Greenhouse Gas Emissions;
- Recreation;
- Utilities and Service Systems;
- Public Services;
- Biological Resources;
- Geology and Soils;
- Hydrology and Water Quality;
- Hazards/Hazardous Materials;
- Mineral/Energy Resources; and
- Agricultural and Forest Resources.

The Code-Compliant Alternative would occupy the same building site as the proposed project and would include residential land uses and a substantially similar (but lessened) residential intensity of uses on the site. Impacts under this alternative for each of the above-noted environmental topics would be substantially similar to those of the proposed project. The Code-Compliant Alternative would not result in any new potentially significant impacts for the environmental topics identified in the NOP/IS for the proposed project. The mitigation measures and improvement measure presented in the NOP/Initial Study for the proposed project (**Mitigation Measure M-CP-2: Archaeological Testing, Monitoring, Data Recovery and Reporting; Mitigation Measure M-CP-3: Paleontological Resources Monitoring and Mitigation Program; Mitigation Measure M-HZ-2: Hazardous Building Materials Abatement Site Assessment and Corrective Action for All Sites; and Mitigation Measures M-HZ-1b: Hazardous Building Materials Abatement**) would also be applicable under the Code-Compliant Alternative. Therefore, the conclusions in the NOP/IS with respect to the above environmental topics would be less than significant or less than significant with mitigation under the Code-Compliant Alternative.

CONCLUSION

The Code-Compliant Alternative would not require amendment of the existing 240-E height and bulk limitations. Like the proposed project, the Code-Compliant Alternative would result in less-than-significant project-level and cumulative land use and land use planning impacts. As with the proposed project, the Code-Compliant Alternative would result in less-than-significant impacts related to transportation, and wind and shadow (before mitigation), and less-than-significant impacts related to noise and air quality (with mitigation measures).

Relationship to Project Objectives

For the purposes of selecting alternatives for inclusion and study within the EIR under *CEQA Guidelines* § 15126.6, the Code-Compliant Alternative could feasibly attain most of the project sponsor's basic objectives of the proposed project, as presented in **Chapter 2, Project Description**, on pp. 2.2-2.3.

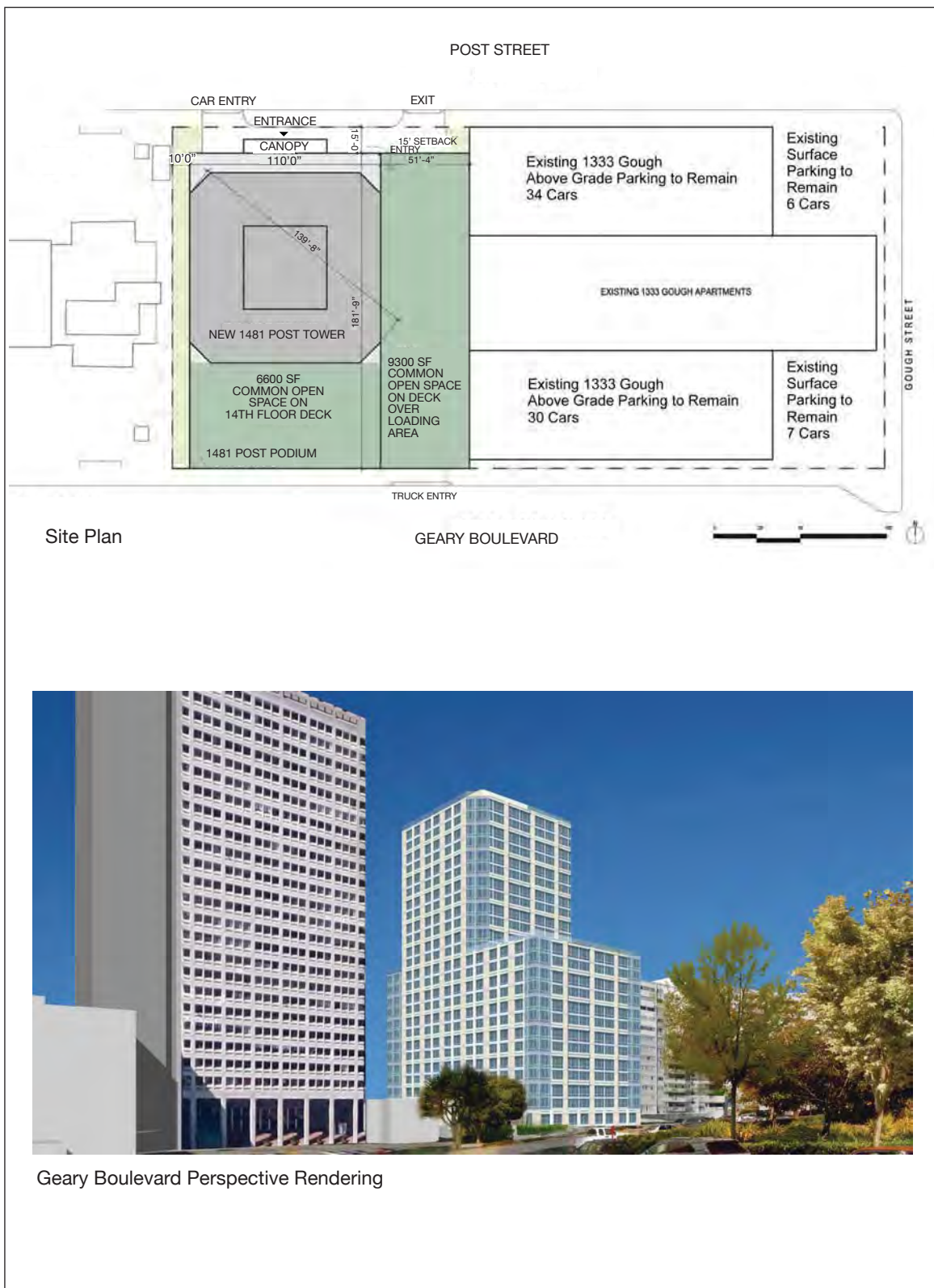
Compared to the proposed project, this alternative would not fully achieve the project's urban design objectives related to providing active uses and streetscape improvements to enhance the pedestrian experience. Although it is assumed that this alternative would implement applicable improvements under the Better Streets Plan along the 1481 Post Street frontages of Post Street and Geary Boulevard, under this alternative, the Post Street, Gough Street, and Geary Boulevard frontages of the existing 1333 Gough Street building would remain largely in their existing condition. This proposal would not include a café and would not include a new swimming pool addition and entrance on Geary Boulevard. Streetscape improvements would be limited to the Post Street and Gough Street frontages of the new 1481 Post Street building under this alternative.

This alternative would provide fewer units than would the proposed project and, together with larger floorplates with less window exposure and a lower proportion of more desirable upper-floor units, this alternative would produce a lower rate of return on investment for the project sponsor and its investors. This alternative would not meet the project sponsor's goal of maximizing the opportunity to create high-density housing near the Van Ness Avenue corridor.

D. ALTERNATIVE C: REDUCED HEIGHT ALTERNATIVE

DESCRIPTION

Alternative C: Reduced Height Alternative provides an alternative with the same number of residential units as the proposed project (262 units) in a 240-foot-tall, 25-story building. (See **Figure 6.2: Reduced Height Alternative - Site Plan and Geary Boulevard Perspective Rendering**.) As with Alternative B: Code-Compliant Alternative, under this alternative, the



SOURCES: SLCE/MWA Architects

1333 GOUGH STREET/1481 POST STREET

2005.0679E

**FIGURE 6.2: REDUCED HEIGHT ALTERNATIVE -
SITE PLAN AND GEARY BOULEVARD PERSPECTIVE RENDERING**

western portion of the existing 1333 Gough Street parking garage (and the existing two tennis courts and vacant pool building that sit atop this portion of the parking garage) would be demolished. A new residential building would be constructed in the western portion of the project site.

The building would conform to the height limitations of the 240-E Height and Bulk District. However, the new building under this alternative would not conform to bulk controls in the “E” district which become effective above a building height of 65 feet and limit plan dimensions to a maximum horizontal dimension of 110 feet, and a maximum diagonal measurement of 140 feet (this alternative’s diagonal measurement below 65 feet would be 212 feet, exceeding the 240-E diagonal measurement limit). Like the proposed project, this alternative would also not comply with Planning Code requirements governing rear yard depth (Planning Code § 134), and dwelling unit exposure (Planning Code § 140).

The new building under this alternative would have a 13-story podium base that would be set back 15 feet from Post Street, 51 feet from the existing 1333 Gough Street building on the eastern portion of the project site, and 10 feet from the west property line of the project site shared with The Sequoias. (See **Table 6.1** on pp. 6.2-6.4 for more information about building setbacks under each alternative, compared against those of the proposed project.) Above the 13th floor to the 25th floor, the tower shaft element would rise from the podium to a height of 240 feet. The tower element would be roughly square in plan, with chamfered corners, measuring 110 feet north-to-south and east-to-west. Diagonally, the tower element of this alternative would measure 139 feet, 8 inches.

Program

The new 1481 Post Street building under the Reduced Height Alternative would contain 262 market rate units, the same number as the proposed project and its variants and more than Alternatives B or D. No café use would be included under this alternative. The existing 1333 Gough Street building would continue to include 169 residential units. No renovation of the 1333 Gough Street fitness center, or construction of a pool addition, would occur. The existing fitness center would continue to operate but the facility would no longer include the two existing tennis courts.

Parking and Site Access

Under this alternative, the portions of the existing parking structure directly to the north and south of the 1333 Gough Street building (64 spaces) and the existing 13 surface parking spaces at the northeast and southeast corners of the project site (for two 1333 Gough Street resident spaces, seven 1333 Gough Street visitor spaces, and four carshare spaces) would be retained and reused.

The portion of the existing above-ground parking structure on the western portion of the project site, along with the tennis courts and pool building on its roof, would be demolished and an new 5-level, 365-space, subsurface parking garage would be constructed for residents of the new 1481 Post Street building under this alternative (262 spaces) and as replacement parking for the existing 1333 Gough Street resident parking spaces on the western portion of the project site that would be demolished under this alternative (103 spaces). However, all parking spaces for residents and visitors of 1333 Gough Street would be temporarily unavailable for about 12 months until the new subsurface parking garage could be occupied.

Site access for residents of the new 1481 Post Street building under this alternative would be similar to that described for the proposed project in **Chapter 2, Project Description**, on pp. 2.23-2.24. Passenger vehicles would enter the western portion of the project site from Post Street near the northwest corner of the project site and proceed to a passenger drop-off at the lobby entrance. Vehicles could proceed to a two-way ramp to the parking garage below. Vehicles would exit the site to Post Street through a curb cut east of the entrance curb cut.

Site access for residents of the existing 1333 Gough Street building would be the same as that described for existing conditions for the 1333 Gough Street building on p. 2.5. The lobby entrance and passenger drop-off would be along Post Street at its existing location. Existing curb cuts at the northeast and southeast corners of the project site along Gough Street and Geary Boulevard would remain in place. However, the replacement parking spaces for residents of 1333 Gough Street that would be accommodated in the new subsurface parking garage would be accessed as described above for residents of the new 1481 Post Street Building.

This alternative would not preclude the installation of the midblock crosswalk nor reduce its functionality. Although it is assumed that this alternative would implement applicable improvements under the Better Streets Plan along the 1481 Post Street frontages along Post Street and Geary Boulevard, no changes would occur along the 1333 Gough Street frontages under this alternative, unlike the proposed project or its variants.

Loading for the new 1481 Post Street building and the existing 1333 Gough Street building would be similar to that described for proposed project on pp. 2.28-2.29. Delivery vehicles for both the new 1481 Post Street building under this alternative and the existing 1333 Gough Street building would access the project site from a curb cut entrance along Geary Boulevard and exit the project site onto Post Street. If a request to designate the curb space between the two driveways were approved, as for the proposed project, additional loading activities for 1481 Post Street could be accommodated on the street.

Discretionary Approvals

Like the proposed project, under the Reduced Height Alternative, the following discretionary project approvals would be required: General Plan amendment and Planning Code amendment to reclassify the existing “E” Bulk District to allow a diagonal plan measurement to exceed 140 feet above a height of 65 feet. This alternative would also require a determination by the Planning Commission and Recreation and Park Commission under Planning Code § 295 that new shadow being cast on Peace Plaza would not be adverse to the use of the park; Conditional Use authorization from the Planning Commission to construct a building exceeding a height of 50 feet in an RM-4 District; and approval by the Planning Commission of a Planned Unit Development (including amendments to the existing 1963 PUD as necessary) to allow exceptions to provisions of the Planning Code governing rear yard depth (Planning Code § 134).

Unlike the proposed project, no *General Plan* amendment or Planning Code amendment would be required to exceed the existing 240-foot height limit.

IMPACTS

Land Use and Land Use Planning

The 240-foot-tall Reduced Height Alternative would include a mix of residential and parking uses. This alternative would not include retail uses or an expanded fitness center facility at 1333 Gough Street. Unlike the proposed project, the Reduced Height Alternative would comply with the existing height limit for the project site. Like the proposed project, this alternative would not comply with the bulk controls for the project site and other relevant requirements of the Planning Code. However, as with the proposed project, this alternative would result in a less-than-significant impact related to conflict with land use plans and policies.

Like the proposed project this alternative would not adversely affect neighborhood character or cause adverse land use impacts. The impact of this alternative related to compatibility with surrounding character would be considered less than significant.

Like the proposed project, and for the same reasons presented under **Impact C-LU-1** on pp. 4.B.18-4.B.19, the Reduced Height Alternative would not make a cumulatively considerable contribution to a significant impact related to land use and land use planning.

Transportation and Circulation

This subsection summarizes and incorporates by reference the *1333 Gough Street/1481 Post Street Project – Alternatives Assessment*, prepared by the transportation consultant.⁶ Under the Reduced Height Alternative, the same number of residential units (262 units) would be provided as in the proposed project or its variants; however, the studio/one-bedroom units under this alternative would account for about 63 percent of the units, compared to 52 percent in the proposed project or its variants. Unlike with the proposed project or its variants, there would be no café/restaurant or expanded fitness center uses under the Reduced Height Alternative. As a result, the number of weekday PM peak hour person and vehicle trips under the Reduced Height Alternative would be substantially less than with the proposed project or its variants (see **Table 6.4: Trip Generation by Mode – Weekday PM Peak Hour, Proposed Project and Reduced Height Alternative**).

Table 6.4: Trip Generation by Mode – Weekday PM Peak Hour, Proposed Project and Reduced Height Alternative

Project/Alternative	Person Trips				Total	Vehicle Trips
	Auto	Transit	Walk	Other ^a		
Weekday PM Peak Hour						
Proposed Project	190	187	83	42	502	150
Reduced Height Alternative	126	157	65	34	382	117

Note:

^a Other mode includes bicycles, motorcycles, and taxis

Sources: *SF Guidelines 2002*; 2000 U.S. Census; LCW Consulting, 2014

Under the Reduced Height Alternative, vehicular ingress to, and egress from, the proposed subsurface parking garage that would serve the 1481 Post Street building and part of the 1333 Gough Street building would be from Post Street as with the proposed project or Variants A and C.⁷ The existing vehicular ingress to, and egress from, the surface parking and the retained portion of the existing parking structure that serve the residents and visitors of 1333 Gough Street building would not be changed as in the proposed project or its variants (i.e., both Gough Street driveways and the Geary Boulevard driveway would remain and a new Post Street driveway immediately west of Gough Street would not be provided). Unlike the proposed project, access to the parking spaces within the proposed subsurface parking garage intended to replace those lost as part of the demolition of the western portion of the existing structured parking would be from the proposed driveways for the 1481 Post Street building. As with the proposed project, the project sponsor would request that the curb between the inbound and outbound driveways on Pine

⁶ LCW Consulting, Memo to Rachel Schuett Re: 1333 Gough Street/1481 Post Street Project – Alternatives Assessment, April 7, 2014. A copy of this document is available for review at the San Francisco Planning Department, 1650 Mission Street, Suite 400, as part of Case File No. 2005.0679.

⁷ Under Variant B site access would also be from Post Street but it would be from one, two-way driveway instead of two separate inbound and outbound driveways as in the proposed project or Variants A and C and the Reduced Height Alternative.

Street be designated as a commercial loading space. The Reduced Height Alternative would include two off-street loading spaces with access from Geary Boulevard in a service area/truck loading area proposed to serve both buildings as in the proposed project or its variants.

Traffic Impacts

As shown in **Table 6.4**, the Reduced Height Alternative would generate fewer vehicle trips than the proposed project or its variants. During the weekday PM peak hour, the new uses associated with the Reduced Height Alternative would generate about 117 vehicle trips compared to about 150 vehicle trips in the proposed project or its variants. With a reduction in the number of vehicles added to the study intersections, which operate at acceptable LOS conditions under existing conditions and Existing plus Project/Variant conditions, the traffic impacts of the Reduced Height Alternative at these study intersections would be less than those of the proposed project or its variants. Furthermore, vehicular ingress to, and egress from, the proposed subsurface garage from Post Street under this alternative would not affect traffic operations on Post Street or Geary Boulevard similar to the proposed project or its variants. Therefore, the traffic impacts under this alternative would be less than significant, as with the proposed project or its variants.

While the Reduced Height Alternative, like the proposed project or its variants, would result in a less-than-significant impact at the studied intersections, **Improvement Measures I-TR-A: Monitoring and Abatement of Queues and Conflicts** and **I-TR-B: Transportation Demand Management Plan**, identified for the proposed project or its variants and described on pp. 4.C.41 to 4.C.43, would also be applicable to this alternative to reduce its less-than-significant effect on traffic operations on adjacent streets.

Transit Impacts

As shown in **Table 6.4**, the Reduced Height Alternative would generate fewer transit trips than the proposed project or its variants. During the weekday PM peak hour, the new uses associated with the Reduced Height Alternative would generate about 157 transit trips compared to about 187 transit trips in the proposed project or its variants. With a reduction in the number of transit riders added to the local and regional transit screenlines and corridors, the impacts of the Reduced Height Alternative on local and regional transit capacity utilization and Muni operations on adjacent streets would be less than significant, as with the proposed project or its variants.

While the Reduced Height Alternative, like the proposed project or its variants, would result in less-than-significant regional and local transit impacts, **Improvement Measures I-TR-G: Coordination of Move-In/Move-Out Activities and Large Deliveries** and **I-TR-H: PM Peak Period Off-Street Loading Access Restrictions**, identified for the proposed project or its

variants and described on p. 4.C.58, would also be applicable to this alternative to lessen its effect on transit operations on adjacent streets.

Pedestrian Impacts

The Reduced Height Alternative would generate fewer pedestrian trips than the proposed project or its variants. During the weekday PM peak hour, the new uses associated with the Reduced Height Alternative would generate about 256 pedestrian trips compared to about 312 pedestrian trips in the proposed project or its variants. With a reduction in the number of pedestrians added to the local pedestrian network and the number of vehicles accessing the project site under this alternative, impacts related to pedestrian LOS conditions on adjacent sidewalks and crosswalks at the intersection of Gough Street/Geary Boulevard and the potential for pedestrian-vehicle conflicts would be less than for proposed project or its variants. This alternative would not substantially affect pedestrian flows on Post and Gough streets or Geary Boulevard, create potentially hazardous conditions for pedestrians or otherwise interfere with pedestrian accessibility to the site and adjoining areas. Therefore, as with the proposed project or its variants, pedestrian impacts under this alternative would be less than significant.

This alternative would not change sidewalk widths along the perimeter of the 1333 Gough Street portion of the project site. While the Reduced Height Alternative, like the proposed project or its variants, would result in less-than-significant pedestrian impacts, **Improvement Measures I-TR-C: Fund the Design and Implementation of Upgraded Crosswalks at Two Intersections in Project Vicinity, I-TR-D: Fund the Design and Implementation of Pedestrian Countdown Signals at Two Intersections in Project Vicinity, and I-TR-E: Contribute to the Cost of Design and Implementation of Pedestrian-Actuated Flashing Beacons at the Existing Midblock Crosswalk on Post Street between Laguna and Gough Streets**, identified for the proposed project or its variants and described on pp. 4.C.51-4.C.52, would also be applicable to this alternative to lessen its effect related to pedestrians.

Bicycle Impacts

The Reduced Height Alternative would provide 262 Class 1 and 13 Class 2 bicycle parking spaces, and like the proposed project or its variants, would meet the Planning Code requirements. Unlike the proposed project or its variants for the proposed 1481 Post Street building, which provide Class 1 and Class 2 bicycle parking spaces for café/restaurant uses, under this alternative none would be provided since there are no retail uses. In addition, this alternative would not provide 30 Class 1 bicycle parking spaces for 1333 Gough Street unlike the proposed project or its variants. Similar to the proposed project or its variants, Class 1 bicycle parking spaces would be located on the first basement level with access from Post Street via the garage ramp or elevator shuttle under this alternative. No new bicycle parking facilities would be provided at

1333 Gough Street, unlike the proposed project or its variants. Similar to the proposed project or its variants, the Reduced Height Alternative would result in an increase in the number of vehicles and bicycles in the vicinity of the project site; however, this increase would not be substantial enough to affect bicycle travel or facilities in the area. The Reduced Height Alternative would not substantially change bicycle travel in the vicinity of the project site, and therefore, similar to the proposed project or its variants, impacts on bicyclists would be less than significant.

While the Reduced Height Alternative, like the proposed project or its variants, would result in less-than-significant bicycle impacts, **Improvement Measure I-TR-F: Additional Bicycle Parking for the 1333 Gough Street Building**, identified for the proposed project or its variants and described on p. 4.C.54, would also be applicable to this alternative to encourage bicycle use to and from the project site.

Loading Impacts

As described above, the Reduced Height Alternative would provide two off-street loading spaces with access from Geary Boulevard, similar to the proposed project or its variants. As with the proposed project, the project sponsor would request that the existing curb on Post Street (approximately 60 feet) between the inbound and outbound driveways for the 1481 Post Street building be designated a commercial loading space under the Reduced Height Alternative. Compared to the proposed project or its variants, there would be the same number of residential units, but no café/restaurant or expanded fitness center space under this alternative. Therefore, loading demand associated with the uses under this alternative would be less than with the proposed project or its variants. Since the Reduced Height Alternative would provide off-street loading, and because the loading demand could be accommodated on site and at the proposed commercial loading space, loading impacts under this alternative would be less than significant, as with the proposed project or its variants.

While the Reduced Height Alternative, like the proposed project or its variants, would result in less-than-significant loading impacts, **Improvement Measures I-TR-A: Monitoring and Abatement of Queues and Conflicts, I-TR-G: Coordination of Move-In/Move-Out Activities and Large Deliveries, and I-TR-H: PM Peak Period Off-Street Loading Access Restrictions**, identified for the proposed project or its variants and described on pp. 4.C.41-4.C.42 and p. 4.C.58, would also be applicable to this alternative to lessen the effect of loading operations on traffic and transit operations.

Emergency Access Impacts

As with the proposed project or its variants, the Reduced Height Alternative would not change the configuration or capacity of the travel lanes adjacent to the project site. Therefore, it would not affect emergency vehicle access to the project site or project vicinity. Similar to the proposed project or its variants, the impacts of the Reduced Height Alternative on emergency access would be less than significant.

Construction Impacts

Construction activities associated with the Reduced Height Alternative would be similar to those described for the proposed project or its variants. Under this alternative construction would occur over a period of approximately 26 months, 1 month shorter than the 27-month construction period for the proposed project or its variants. As with the proposed project or its variants, the construction-related transportation impacts of this alternative would be less than significant due to their temporary and limited duration. While the construction-related transportation impacts under this alternative would be less than significant, particularly since this alternative would involve less on-site development compared to the proposed project or its variants, **Improvement Measure I-TR-I: Construction Measures**, identified for the proposed project or its variants and described on pp. 4.C.63-4.C.64, would also be applicable to this alternative to reduce its less-than-significant construction-related transportation effects.

Parking Information

Table 6.5: Vehicle Parking Supply and Demand Comparison Proposed Project and Reduced Height Alternative presents the parking supply and demand comparisons for the overnight and midday periods for the proposed project or its variants and the Reduced Height Alternative. Midday residential parking demand would be approximately 80 percent of the overnight demand.

Table 6.5: Vehicle Parking Supply and Demand Comparison Proposed Project and Reduced Height Alternative

Project/Alternative and Period	Supply	Demand	(Shortfall)/Surplus
Midday			
Proposed Project	262	295	(33)
Reduced Height Alternative	262	262	0
Overnight			
Proposed Project	262	339	(77)
Reduced Height Alternative	262	327	(65)

Source: SF Guidelines 2002, LCW Consulting, 2014.

As shown in **Table 6.5**, the Reduced Height Alternative would not result in any unmet parking demand during the midday period, because unlike the proposed project or its variants, this

alternative would not include any café/restaurant or net-new fitness center space. As with the proposed project or its variants, this alternative would have an unmet parking demand during the overnight period (98 unmet spaces with the proposed project or its variants, 116 spaces under each of the variants, and 65 spaces with the Reduced Height Alternative).⁸ This alternative would not have as substantial an unmet overnight parking demand as the proposed project or its variants due to the change in the mix of residential units proposed under this alternative (i.e. fewer two- and three-bedroom units than in the proposed project or its variants.)

As with the proposed project or its variants, some drivers would need to park elsewhere in the area (either on-street or within the Japan Center Garage), which would increase the overnight parking occupancy in the area. Due to difficulty in finding on-street parking in the study area, some drivers may park outside of the study area, switch to transit, carpool, bicycle or other forms of travel. As with the proposed project or its variants, the Reduced Height Alternative's unmet overnight parking demand would not be substantial and could be accommodated on-street or in other off-street parking facilities, and the area is well served by public transit and other modes. Therefore, similar to the proposed project or its variants, the unmet parking demand would not create hazardous conditions or significant delays affecting traffic, transit, bicycles or pedestrians under this alternative, however to encourage transit use and reduce parking demand,

Improvement Measure I-TR-B: Transportation Demand Management Plan, identified for the proposed project or its variants and described on pp. 4.C.42-4.C.43, would also be applicable to the Reduced Height Alternative.

2040 Cumulative Conditions

As shown in **Table 6.4**, the Reduced Height Alternative would generate fewer vehicle trips than would the proposed project or its variants. Under 2040 Cumulative conditions, vehicle delays under the Reduced Height Alternative would increase at the study intersections compared to existing conditions, and, as under the proposed project or its variants, all study intersections would operate at LOS D or better during the weekday AM and PM peak hours except the Franklin/O'Farrell intersection (weekday PM peak hour only), which would operate at LOS E under 2040 Cumulative conditions. Like the proposed project or its variants, this alternative would result in a less-than-cumulatively-considerable contribution to significant cumulative impacts at the intersection that operates at LOS E, based on consideration of the alternative's contribution to the critical northbound through/ right movement. Therefore, the Reduced Height

⁸ This total includes the number of on-street spaces that would be eliminated as a result of the sidewalk widening under the proposed project (21 spaces) and the expansion of that sidewalk widening under each of the variants (39 spaces). The Reduced Height Alternative would eliminate fewer on-street parking spaces than the proposed project or its variants because the corner bulbs at Post and Gough streets and at Gough Street and Geary Boulevard would not be included, as in the proposed project, and the sidewalk widening in the variants would not occur.

Alternative's traffic impacts under 2040 cumulative conditions at the study intersections would be less than cumulatively considerable since its contribution to the critical movement would be less than for the proposed project or its variants.

In summary, similar to the proposed project or its variants, under the Reduced Height Alternative there would be less-than-significant project-level impacts and no cumulatively considerable contribution to significant cumulative impacts related to transportation and circulation.

Noise

The Reduced Height Alternative would result in demolition, excavation, and building construction activities that would occur over a total period of approximately 26 months, 1 month shorter than the 27-month total construction period with the proposed project. As under the proposed project, these activities would temporarily and intermittently increase noise and groundborne vibration in the project vicinity to levels that could be considered an annoyance by occupants of nearby properties, although noise and vibration levels would vary greatly and be limited to the duration of the various construction phases. As with the proposed project, the greatest construction noise and vibration impacts would occur during the demolition, excavation, and basement construction phases (the first 10 months under this alternative).

The greatest impacts would be experienced at the residences at 1333 Gough Street and at the health center facility at 1400 Geary Boulevard (The Sequoias), immediately adjacent to the project site and within a building that is 6 feet, 8 inches from the west property line at its closest point. As with the proposed project, demolition, excavation and shoring, and other below-grade work would occur at the western property line. In contrast with the proposed project, slightly lower noise and vibration levels would occur at 1333 Gough Street and other receptors east of the site because there would be less demolition and renovation of the eastern portion of site under this alternative.

Construction activities would be required to comply with the San Francisco Noise Ordinance. However, as with the proposed project, noise from construction would still be substantially greater than existing noise levels in the project vicinity and would require additional controls to meet the construction noise requirements of the Noise Ordinance, and could significantly impact nearby sensitive receptors. To ensure construction noise is reduced to the maximum amount feasible, **Mitigation Measure M-NO-1: Construction Noise Control Measures**, identified for the proposed project and described in **Section 4.D, Noise**, pp. 4.D.26-4.D.27, would also be applicable under this alternative. **Mitigation Measure M-NO-1** would require the project contractor to use equipment with lower noise emissions and sound controls where feasible and locate stationary equipment as far as possible from sensitive receptors.

On-site receptors and those at The Sequoias at 1400 Geary Boulevard would be exposed to construction vibration at levels that could exceed the thresholds of annoyance and, conservatively, could result in potential structural damage. To reduce the impact of construction vibration to the maximum amount feasible, mitigation would also be necessary, similar to the proposed project.

Mitigation Measure M-NO-2a: Minimize Vibration Levels During Construction would mitigate the impact of human annoyance by providing a community liaison to respond to and address complaints, by requiring protective techniques during demolition, and by phasing activities where feasible. To conservatively protect buildings within 10 feet of project demolition, excavation and shoring, and other below-grade work, **Mitigation Measure M-NO-2b: Pre-Construction Assessment to Protect Structures from Ground Vibration during Below-Grade Work** would require use of smaller equipment in some construction areas, a preconstruction assessment and, if needed, shoring of adjacent structures and monitoring during vibration-causing activities to detect ground settlement or lateral movement of structures. As with the proposed project, implementation of these mitigation measures under this alternative would decrease significant project-level construction noise and vibration impacts to less-than-significant levels.

As with the proposed project, noise generated during construction of the Reduced Height Alternative could combine with construction noise from the proposed Geary BRT project which would likely employ construction equipment such as jackhammers for pavement breaking, bulldozers for grading, and heavy trucks for material hauling. The construction activities associated with the proposed Geary BRT project along the adjacent segment of Geary Boulevard would include the repair, replacement, and/or other modifications to the road surface, curbs, or utilities and construction of BRT stations in the public right-of-way. Construction activities for the Geary BRT project would be required to comply with the Noise Ordinance and would be subject to enforcement of the Noise Ordinance by DPW, and the Police Department. However, if the construction phases for the proposed Geary BRT project were to overlap with those of the Reduced Height Alternative, the closest noise-sensitive receptors could experience significant temporary or periodic cumulative increases in ambient noise. As with the proposed project, implementation of **Mitigation Measures M-NO-1, M-NO-2a, and M-NO-2b** under this alternative would reduce a potential cumulatively considerable contribution to cumulative construction-related noise and vibration impacts to a less-than-significant level.

Operation of the Reduced Height Alternative would introduce additional mobile and fixed noise sources to the area, i.e., new vehicle trips and new mechanical equipment for building utilities, including ventilation equipment (HVAC equipment) and other building mechanical systems. Rooftop mechanical equipment under this alternative would be located at a height of 240 feet, rather than at a height of 398 feet under the proposed project, increasing the potential for operational noise impacts on neighboring properties. Noise generated by stationary equipment would be required to comply with the San Francisco Noise Ordinance, which requires that

equipment operating on residential property not produce a noise level more than 5 dBA above the ambient noise level at the property line or its plane.

Under the Reduced Height Alternative, there would be fewer net new vehicle trips than with the proposed project because there would be no retail and no expansion of the fitness center. Thus, the increase in traffic noise levels in the project vicinity under this alternative would be slightly less than that which would be experienced under the proposed project.

As with the proposed project, there would be less-than-significant project-level operational noise impacts and no cumulatively considerable contribution to significant cumulative operational ambient noise levels under this alternative.

As with the proposed project, new residential uses under this alternative would be required to incorporate acoustical insulation or other equivalent measures to reduce interior noise levels to comply with applicable standards under Title 24 and the *San Francisco General Plan* Land Use Compatibility Guidelines for Community Noise. Thus, as with the proposed project, there would be no significant project-level noise impacts or cumulatively considerable contribution to significant cumulative noise impacts on new residents under this alternative.

Air Quality

Similar to the proposed project, the Reduced Height Alternative would result in demolition, excavation, and building construction activities that would cause emissions of criteria air pollutants that would affect local air quality. Activities that create dust would be subject to the Construction Dust Control Ordinance. The construction activities, equipment, and phasing under this alternative would be similar to those of the proposed project. However, construction-related emissions under this alternative would be slightly less than those under the proposed project due to the reduction in the number of construction truck trips necessary to haul excavated materials off-site (from 83,000 cubic yards under the proposed project to 59,900 cubic yards under this alternative). This alternative would result in construction emissions of criteria air pollutants that would be above the applicable significance thresholds, requiring mitigation, as under the proposed project. TACs emitted during construction would not expose sensitive receptors to substantial pollutant concentrations, as under the proposed project. Implementation of **Mitigation Measure M-AQ-1: Construction Emissions Minimization Plan**, identified for the proposed project and described on pp. 4.E.30-4.E.31, would be applicable to this alternative. This mitigation measure, which calls for the development of a construction emissions minimization plan, would reduce construction emissions and the construction-related emissions impacts of this alternative on nearby sensitive receptors to a less-than-significant level.

Due to no retail or expanded health club uses, operational emissions for the Reduced Height Alternative would be similar to, but less than, those of the proposed project. Sources of operational emissions for this alternative would include a back-up emergency generator, other mechanical systems, and new motor vehicle trips with emissions from mobile sources. The emissions from mobile sources would be slightly less than those of the proposed project, because of the lower travel demand under this alternative, with no new retail space and no expanded health club. As with the proposed project, the project sponsor would be required to obtain applicable permits to operate an emergency generator from the BAAQMD. Thus, operational criteria air pollutant emissions would be below the thresholds of significance and would not violate any air quality standard or contribute substantially to a violation of a standard.

Under this alternative, as with the proposed project, the new residential land use would be developed in an area that does not experience high levels of air pollution. Thus, this alternative would result in a less-than-significant impact with respect to exposing sensitive receptors to substantial pollutant concentrations.

As with the proposed project, the Reduced Height Alternative would not conflict with or obstruct implementation of the applicable air quality plan, and this alternative would not expose a substantial number of people to objectionable odors.

Project-level criteria air pollutant emissions at levels below the thresholds are not anticipated to contribute to an air quality violation or result in a cumulatively considerable net increase in criteria air pollutants. No additional mitigation would be necessary for cumulative air quality impacts. Similar to the proposed project, construction or operation of this alternative, in combination with other reasonably foreseeable projects in the project vicinity, would not expose sensitive receptors to substantial pollutant concentrations. Therefore, as with the proposed project, there would be less-than-significant (with mitigation incorporated) project-level impacts and no cumulatively considerable contribution to significant cumulative impacts related to air quality under the Reduced Height Alternative.

Wind

Like the proposed project, the 240-foot-tall Reduced Height Alternative was tested in an atmospheric boundary layer wind tunnel. This alternative would not result in substantial changes to ground-level wind conditions in the project vicinity. Under this alternative, the average wind speed at the 54 test points would remain substantially unchanged from existing conditions at around 12 mph, the number of exceedances of the wind comfort criterion would decrease from 30 to 26, and there would be no exceedances of the wind hazard criterion. Under this alternative, the exceedances of the wind comfort criterion would be in the same general locations as those that would occur under the proposed project. As with the proposed project, this alternative would

result in winds on the south side of Geary Boulevard that approach but would not exceed the wind hazard criterion. Like the proposed project, the Reduced Height Alternative would have a less-than-significant project-level wind impact and a less-than-significant cumulatively considerable contribution to significant cumulative wind impacts.

Shadow

The 240-foot-tall Reduced Height Alternative, which is 158 feet shorter than the proposed project, would result in reduced shadow impacts when compared to the proposed project. This alternative would shadow two parks, whereas the proposed project would shadow six parks. The Reduced Height Alternative would shadow Peace Plaza, Cottage Row Mini Park, and public sidewalks in the project vicinity at the same time of day and during the same times of year as would the proposed project. This alternative would not shadow four parks (the Hamilton Recreation Center, Raymond Kimbell Playground, Gene Suttle Plaza, and Fillmore Center Plaza) that would be shadowed by the proposed project. Regarding the two parks that would be shadowed by this alternative, the net new shadow from this alternative would cover the same general areas as the net new shadow from the proposed project. Depending on the time of day, the duration of the net new shadow would be shorter under this alternative due to its reduced height (i.e., the shorter building height would result in a shorter shadow that would move off the park sooner than a longer shadow). Like the proposed project, the Reduced Height Alternative would have a less-than-significant project-level shadow impact and a less-than-significant cumulatively considerable contribution to significant cumulative shadow impacts.

Other Topics

The NOP/IS and public scoping process concluded that the proposed project would have no impacts, less-than-significant impacts, or less-than-significant impacts with mitigation in the following analysis areas:

- Land Use and Land Use Planning (Physically Divide an Established Community, only);
- Population and Housing;
- Cultural and Paleontological Resources;
- Greenhouse Gas Emissions;
- Recreation;
- Utilities and Service Systems;
- Public Services;
- Biological Resources;
- Geology and Soils;
- Hydrology and Water Quality;

- Hazards/Hazardous Materials;
- Mineral/Energy Resources; and
- Agricultural and Forest Resources.

The Reduced Height Alternative would occupy the same building site as the proposed project and would include residential land uses and the same residential intensity of uses on the site. Impacts under this alternative for each of the above-noted environmental topics would be substantially similar to those of the proposed project. The Reduced Height Alternative would not result in any new potentially significant impacts for the environmental topics identified in the NOP/IS for the proposed project. The mitigation measures and improvement measure presented in the NOP/Initial Study for the proposed project (**Mitigation Measure M-CP-2: Archaeological Testing, Monitoring, Data Recovery and Reporting; Mitigation Measure M-CP-3: Paleontological Resources Monitoring and Mitigation Program; Mitigation Measure M-HZ-2: Hazardous Building Materials Abatement Site Assessment and Corrective Action for All Sites; and Mitigation Measures M-HZ-1b: Hazardous Building Materials Abatement**) would also be applicable under the Reduced Height Alternative. Therefore, the conclusions in the NOP/IS with respect to the above environmental topics would be less than significant or less than significant with mitigation under the Reduced Height Alternative.

CONCLUSION

The Reduced Height Alternative would not require amendment of the existing height limit for the project site. Like the proposed project it would require amendment of the existing bulk limit. However, as with the proposed project, this alternative would result in less-than-significant project-level and cumulative land use and land use planning impacts. As with the proposed project, the Reduced Height Alternative would result in less-than-significant impacts related to transportation and wind and shadow (before mitigation), and less-than-significant impacts related to noise and air quality (with mitigation measures).

Relationship to Project Objectives

For the purposes of selecting alternatives for inclusion and study within the EIR under *CEQA Guidelines* § 5126.6, the Reduced Height Alternative could feasibly attain most of the project sponsor's basic objectives of the proposed project, as presented in **Chapter 2, Project Description**, on pp. 2.2-2.3.

Compared to the proposed project, the Reduced Height Alternative would not fully achieve the project's urban design objectives related to providing active uses and streetscape improvements to enhance the pedestrian experience. Although it is assumed that this alternative would implement applicable improvements under the Better Streets Plan along the 1481 Post Street frontages of

Post Street and Geary Boulevard, under this alternative, the Post Street, Gough Street, and Geary Boulevard frontages of the existing 1333 Gough Street building would remain largely in their existing condition. This proposal would not include a café and would not include a new pool addition and health club entrance on Geary Boulevard. Streetscape improvements would be limited to the Post Street and Gough Street frontages of the new 1481 Post Street building under this alternative.

Compared to the proposed project, this alternative would not fully achieve the project's urban design objectives related to providing active uses and streetscape improvements to enhance the pedestrian experience. Although it is assumed that this alternative would implement applicable improvements under the Better Streets Plan along the 1481 Post Street frontages of Post Street and Geary Boulevard, under this alternative, the Post Street, Gough Street, and Geary Boulevard frontages of the existing 1333 Gough Street building would remain largely in their existing condition. This proposal would not include a café and would not include a new swimming pool addition and entrance on Geary Boulevard. Streetscape improvements would be limited to the Post Street and Gough Street frontages of the new 1481 Post Street building under this alternative.

The Reduced Height Alternative would provide the same number of units as the proposed project. However, they would be on larger floorplates with less window exposure and include a lower proportion of more desirable upper-floor units. This alternative would produce a lower rate of return on investment for the project sponsor and its investors.

E. ALTERNATIVE D: REDUCED TOWER FOOTPRINT AND HEIGHT ALTERNATIVE

DESCRIPTION

Alternative D: Reduced Tower Footprint and Height Alternative provides a development alternative that meets applicable height and bulk provisions of the Planning Code and provides for greater distance between the new tower on the project site and the neighboring property to the west. The 24-story tower under this alternative would be 240 feet tall (256-feet-tall with a 16-foot-tall mechanical penthouse), and contain 161-units on the western portion of the project site. This alternative would also include a total of 26 3-story, single-family townhomes along the Post Street and Geary Boulevard frontages of the project site (totaling 187 units). (See **Figure 6.3: Reduced Tower Footprint and Height Alternative - Site Plan and Geary Boulevard Perspective Rendering.**) This alternative would include a plaza at the western end of the project site. As with the proposed project, under this alternative, the existing 1333 Gough Street parking garage (and the existing two tennis courts and vacant pool building that sit atop this portion of the parking garage) would be demolished.



Site Plan



Geary Boulevard Perspective Rendering

SOURCES: Heller Manus Architects

1333 GOUGH STREET/1481 POST STREET

2005.0679E **FIGURE 6.3: REDUCED TOWER FOOTPRINT AND HEIGHT ALTERNATIVE – SITE PLAN AND GEARY BOULEVARD PERSPECTIVE RENDERING**

This alternative was suggested by representatives of the owner of The Sequoias to comply with existing height and bulk restrictions, and to increase the distance of the tower from the property line shared with The Sequoias.⁹ The new residential tower on the western portion of the project site under this alternative would be set back from the west property line by 40 feet or more (compared to 10 feet under the proposed project). It would be separated from the existing 1333 Gough Street building by 46 feet (compared to 40 feet, 6 inches under the proposed project). (See **Table 6.1** on pp. 6.2-6.4 for more information about building setbacks under each alternative, compared to those of the proposed project.) This alternative would conform to the limitations of the 240-E Height and Bulk District and no rezoning would be required.

This 24-story alternative would be 158 feet lower than the 398-foot-tall (416 feet tall including an 18-foot-tall mechanical penthouse) 1481 Post Street building under the proposed project. The new residential tower under this alternative would not have a podium base. In plan, the tower element under this alternative would measure about 110 feet north to south, about 85 feet east to west, and about 128 feet, 3 inches measured diagonally (compared to the proposed project at 110 feet north to south, 118 feet east to west, and 140 feet measured diagonally). Twenty-six 3-story townhome buildings would line the Post Street and Geary Boulevard frontages of the project site (13 along each frontage). The townhouses would each be set back by about 5 feet along their Street frontages.

Program

The new 1481 Post Street building and townhouses under the Reduced Tower Footprint and Height Alternative would include 187 market rate units (75 fewer units than under the proposed project). No café use would be included under this alternative. The existing 1333 Gough Street building would continue to include 169 residential units. No renovation of the 1333 Gough Street fitness center, or construction of a pool addition, would occur. The existing fitness center would continue to operate but the facility would no longer include the two existing tennis courts (the existing swimming pool building was permanently closed in 2010).

Parking and Site Access

As with the proposed project, under this alternative the existing parking structure to the north, west, and south of the existing 1333 Gough Street building would be demolished and a new subsurface garage would be constructed in its place up to the perimeter property lines on the north, west, and south sides. The garage would provide a total of 367 parking spaces in three levels (compared to 442 parking spaces in four levels under the proposed project) and would

⁹ Steven L. Vettel, Farella Braun +Martel LLP, Letter Re: 333 Gough Street/1481 Post Street Project (2005.0679E) Draft EIR Alternatives. A copy of this document is available for review at the San Francisco Planning Department, 1650 Mission Street, Suite 400, in Case File No. 2005.0679E.

function similar to the proposed project garage, described in **Chapter 2, Project Description**, on pp. 2.24-2.28. Temporary parking during construction would be provided in a similar fashion as that for the proposed project, described on p. 2.43.

Under this alternative, vehicles would enter the 1481 Post Street portion of the project site through a single, two-way, 20-foot-wide curb cut entrance/exit along Post Street. Vehicles could proceed to the passenger drop-off at the lobby entrance under this alternative and proceed southward to exit the site from a single, two-way, 20-foot-wide curb cut entrance/exit, turning right (westbound) onto Geary Boulevard or turn around and exit onto Post Street. Vehicles entering from Post Street could also proceed down a ramp to the subsurface garage. Vehicles exiting the 1481 Post Street portion of the garage would exit the site onto Post Street.

Under this alternative, vehicles would enter the 1333 Gough Street portion of the project site through a single, two-way, 20-foot-wide curb cut entrance/exit along Gough Street by turning right from Gough Street. This driveway would be in a similar location to the existing one but would be about seven feet narrower. Vehicles would proceed to the passenger drop-off at the lobby entrance to the existing 1333 Gough Street building (which would be relocated to the north side of the building under this alternative) and would turn around to exit the site onto Gough Street by turning right. As with the proposed project, vehicles could also proceed down the ramp to the subsurface parking garage with spaces for guests, car-share spaces, and spaces for 1333 Gough Street residents. The two existing driveways at the southeast corner of the site on Gough Street and Geary Boulevard would be removed, as with the proposed project and its variants.

Pedestrian access to the new 1481 Post Street building under this alternative would be from the lobby entrance at the passenger drop-off, accessed from a pedestrian plaza that would be constructed at the western end of the project site under this alternative. Pedestrian access to the townhouses along the Post Street and Geary Boulevard frontages of the project site under this alternative would be directly from the street for each townhouse unit. Pedestrian access to the existing 1333 Gough Street building under this alternative would be from the lobby entrance (which would be relocated to the north side of the building) accessed adjacent to the driveway entrance/exit along Gough Street. This alternative would not preclude the installation of the midblock crosswalk nor reduce its functionality.

Loading for the new 1481 Post Street building and the existing 1333 Gough Street building would be similar to that described for the proposed project on pp. 2.28-2.29. Delivery vehicles for both the new 1481 Post Street building under this alternative and the existing 1333 Gough Street building would access the project site from a curb cut entrance along Geary Boulevard and exit the project site onto Post Street.

Discretionary Approvals

Like the proposed project, under the Reduced Tower Footprint and Height Alternative, the following discretionary project approvals would be required: determination by the Planning Commission and Recreation and Park Commission under Planning Code § 295 that new shadow being cast on Peace Plaza would not be adverse to the use of the park; Conditional Use authorization from the Planning Commission to construct a building exceeding a height of 50 feet in an RM-4 District; and approval by the Planning Commission of a Planned Unit Development (including amendments to the existing 1963 PUD as necessary) to allow exceptions to provisions of the Planning Code governing rear yard depth (Planning Code § 134).

Unlike the proposed project, no *General Plan* amendment or Planning Code amendment to reclassify the existing 240-E Height and Bulk District and no exceptions to provisions of the Planning Code governing residential density (Planning Code § 209.1(1)) would be necessary under this alternative.

IMPACTS

Land Use and Land Use Planning

The 240-foot-tall Reduced Tower Footprint and Height Alternative would include a mix of residential and parking uses. This alternative would not include retail uses or an expanded fitness center facility at 1333 Gough Street. Unlike the proposed project, the Reduced Tower Footprint and Height Alternative would conform to the existing Planning Code height and bulk limits for the project site. This alternative would require an exception for rear yard depth. However, like the proposed project, this alternative would result in a less-than-significant impact related to conflict with land use plans and policies.

Like the proposed project, this alternative would not adversely affect neighborhood character or cause adverse land use impacts. The impact of this alternative related to compatibility with surrounding character would be considered less than significant.

Like the proposed project, and for the same reasons presented under **Impact C-LU-1** on pp. 4.B.18-4.B.19, the Reduced Tower Footprint and Height Alternative would not make a cumulatively considerable contribution to a significant impact related to land use and land use planning.

Transportation and Circulation

This subsection summarizes and incorporates by reference the *1333 Gough Street/1481 Post Street Project – Alternatives Assessment*, prepared by the transportation consultant.¹⁰ Under the Reduced Tower Footprint and Height Alternative, there would be 75 fewer residential units than in the proposed project or its variants (from 262 units to 187), and a change to the mix of units with a higher proportion (10 percent higher of studio/one-bedroom units (from 52 percent of all proposed units in the proposed project or its variants to 62 percent under the Reduced Tower Footprint and Height). Unlike with the proposed project or its variants, there would be no café/restaurant or expanded fitness center uses under the Reduced Tower Footprint and Height Alternative. As a result, the number of weekday PM peak hour person and vehicle trips under the Reduced Tower Footprint and Height Alternative would be substantially less than with the proposed project or its variants (see **Table 6.6: Trip Generation by Mode – Weekday PM Peak Hour, Proposed Project and Reduced Tower Footprint and Height Alternative**).

Table 6.6: Trip Generation by Mode – Weekday PM Peak Hour, Proposed Project and Reduced Tower Footprint and Height Alternative

Project/Alternative	Person Trips				Total	Vehicle Trips
	Auto	Transit	Walk	Other ^a		
Weekday PM Peak Hour						
Proposed Project	190	187	83	42	502	150
Reduced Tower Footprint and Height Alternative	90	112	47	25	274	83

Note:

^a Other mode includes bicycles, motorcycles, and taxis

Sources: *SF Guidelines 2002*; 2000 U.S. Census; LCW Consulting, 2014

Under the Reduced Tower Footprint and Height Alternative, vehicular ingress to, and egress from, the proposed subsurface parking garage that would serve the 1481 Post Street building would be from Post Street via a two-way, 20-foot-wide driveway instead of separate inbound and outbound driveways in the proposed project or Variants A and C.¹¹ In addition, and unlike the proposed project or its variants, vehicles could also exit the site from a single, two-way, 20-foot-wide driveway, turning right (westbound) onto Geary Boulevard. The existing parking structure and surface lots that currently serve the residents and visitors of 1333 Gough Street building would be demolished, and the existing Gough Street and Geary Boulevard driveways at the southeast corner of the project would be eliminated as in the proposed project or its variants. The two-way, 27-foot-wide Gough Street driveway south of Post Street would be modified as in the proposed project or Variants A and B, but would only be 20 feet wide and would serve as the

¹⁰ LCW Consulting, Memo to Rachel Schuett Re: 1333 Gough Street/1481 Post Street Project – Alternatives Assessment, April 7, 2014. A copy of this document is available for review at the San Francisco Planning Department, 1650 Mission Street, Suite 400, as part of Case File No. 2005.0679.

¹¹ Under Variant B site access would also be from Post Street and would be from one, two-way driveway similar to this alternative but different from the proposed project or Variants A and C.

single point of access to the 1333 Gough Street portion of the project site (i.e., the two-way, 24-foot-wide Post Street driveway in the proposed project or Variants A and B would not be part of this alternative).¹² As with the proposed project, the project sponsor would request that the curb on Post Street west of the proposed driveway be designated as a commercial loading space. The Reduced Tower Footprint and Height Alternative would include two off-street loading spaces with access from Geary Boulevard in a service area/truck loading area proposed to serve both buildings as in the proposed project or its variants; however, the proposed 20-foot-wide driveway under this alternative would be narrower than in the proposed project or its variants and would be shared with vehicles exiting the project site.

Traffic Impacts

As shown in **Table 6.6**, the Reduced Tower Footprint and Height Alternative would generate fewer vehicle trips than the proposed project or its variants. During the weekday PM peak hour, the new uses associated with the Reduced Tower Footprint and Height Alternative would generate about 83 vehicle trips compared to about 150 vehicle trips in the proposed project or its variants. With a reduction in the number of vehicles added to the study intersections, which operate at acceptable LOS conditions under existing conditions and Existing plus Project/Variant conditions, the traffic impacts of the Reduced Tower Footprint and Height Alternative at these study intersections would be less than those with the proposed project or its variants. Furthermore, vehicular ingress to, and egress from, the proposed subsurface garage from Post Street under this alternative would not affect traffic operations on Post Street or Geary Boulevard similar to the proposed project or its variants. Therefore, the traffic impacts under this alternative would be less than significant, as with the proposed project or its variants.

While the Reduced Tower Footprint and Height Alternative, like the proposed project or its variants, would result in a less-than-significant impact at the studied intersections, **Improvement Measures I-TR-A: Monitoring and Abatement of Queues and Conflicts** and **I-TR-B: Transportation Demand Management Plan**, identified for the proposed project or its variants and described on pp. 4.C.41-4.C.43, would also be applicable to this alternative to lessen its effect on traffic operations on adjacent streets.

Transit Impacts

As shown in **Table 6.6**, the Reduced Tower Footprint and Height Alternative would generate fewer transit trips than the proposed project or its variants. During the weekday PM peak hour, the new uses associated with the Reduced Tower Footprint and Height Alternative would generate about 112 transit trips compared to about 187 transit trips in the proposed project or its

¹² Under Variant C the existing two-way, 27-foot-wide Gough Street driveway south of Post Street would not be modified unlike in the proposed project or Variants A and B and this alternative.

variants. With a reduction in the number of transit riders added to the local and regional transit screenlines and corridors, the impacts of the Reduced Tower Footprint and Height Alternative on local and regional transit capacity utilization and Muni operations on adjacent streets would be less than significant, as with the proposed project or its variants.

While the Reduced Tower Footprint and Height Alternative, like the proposed project or its variants, would result in less-than-significant regional and local transit impacts, **Improvement Measures I-TR-G: Coordination of Move-In/Move-Out Activities and Large Deliveries** and **I-TR-H: PM Peak Period Off-Street Loading Access Restrictions**, identified for the proposed project or its variants and described on p. 4.C.58, would also be applicable to this alternative to lessen its effect on transit operations on adjacent streets.

Pedestrian Impacts

The Reduced Tower Footprint and Height Alternative would generate fewer pedestrian trips than the proposed project or its variants. During the weekday PM peak hour, the new uses associated with the Reduced Tower Footprint and Height Alternative would generate about 184 pedestrian trips compared to about 312 pedestrian trips in the proposed project or its variants. With a reduction in the number of pedestrians added to the local pedestrian network and the number of vehicles accessing the project site under this alternative, impacts related to pedestrian LOS conditions on adjacent sidewalks and crosswalks at the intersection of Gough Street/Geary Boulevard and the potential for pedestrian-vehicle conflicts would be less than for the proposed project or its variants. This alternative would not substantially affect pedestrian flows on Post and Gough streets or Geary Boulevard, create potentially hazardous conditions for pedestrians or otherwise interfere with pedestrian accessibility to the site and adjoining areas. Therefore, as with the proposed project or its variants, pedestrian impacts under this alternative would be less than significant.

While the Reduced Tower Footprint and Height Alternative, like the proposed project or its variants, would result in less-than-significant pedestrian impacts, **Improvement Measures I-TR-C: Fund the Design and Implementation of Upgraded Crosswalks at Two Intersections in Project Vicinity**, **I-TR-D: Fund the Design and Implementation of Pedestrian Countdown Signals at Two Intersections in Project Vicinity**, and **I-TR-E: Contribute to the Cost of Design and Implementation of Pedestrian-Actuated Flashing Beacons at the Existing Midblock Crosswalk on Post Street between Laguna and Gough Streets**, identified for the proposed project or its variants and described on pp. 4.C.51-4.C.52, would also be applicable to this alternative to lessen its effect related to pedestrians.

Bicycle Impacts

The Reduced Tower Footprint and Height Alternative would provide 187 Class 1 and 9 Class 2 bicycle parking spaces, and like the proposed project or its variants, would meet the Planning Code requirements. Under the Reduced Tower Footprint and Height Alternative, similar to the proposed project or its variants, Class 1 bicycle parking spaces would be located on the first basement level with access from Post Street via the garage ramp or elevator shuttle. Unlike the proposed project, no additional bicycle parking would be provided for the 1333 Gough Street building. Similar to the proposed project or its variants, the Reduced Tower Footprint and Height Alternative would result in an increase in the number of vehicles and bicycles in the vicinity of the project site; however, this increase would not be substantial enough to affect bicycle travel or facilities in the area. The Reduced Tower Footprint and Height Alternative would not substantially change bicycle travel in the vicinity of the project site, and therefore, similar to the proposed project or its variants, impacts on bicyclists would be less than significant.

While the Reduced Tower Footprint and Height Alternative, like the proposed project or its variants, would result in less-than-significant bicycle impacts, **Improvement Measure I-TR-F: Additional Bicycle Parking for the 1333 Gough Street Building**, identified for the proposed project or its variants and described on p. 4.C.54, would also be applicable to this alternative to encourage bicycle use to and from the project site.

Loading Impacts

As described above, the Reduced Tower Footprint and Height Alternative would provide two off-street loading spaces with ingress from, and egress to, Geary Boulevard. Unlike in the proposed project or its variants, large trucks and service delivery vehicles could exit the project site from both Post Street and Geary Boulevard. Similar to the proposed project, the project sponsor would request that approximately 60 feet of the existing curb on Post Street west of the proposed driveway for the 1481 Post Street building be designated a commercial loading space under this alternative.¹³ Compared to the proposed project or its variants, there would be fewer residential units, no café/restaurant space, and no fitness center addition under the Reduced Tower Footprint and Height Alternative. Therefore, loading demand associated with the uses under this alternative would be less than the proposed project or its variants. Since the Reduced Tower Footprint and Height Alternative would provide off-street loading, and because the loading demand could be accommodated on site and at the proposed commercial loading space, loading impacts under this alternative would be less than significant, as with the proposed project or its variants.

¹³ This on-street commercial loading space would not be requested under any of the variants to the proposed project due to the expansion of the sidewalk widening into the Post Street parking lane fronting the project site.

While the Reduced Tower Footprint and Height Alternative, like the proposed project or its variants, would result in less-than-significant loading impacts, **Improvement Measures I-TR-A: Monitoring and Abatement of Queues and Conflicts, I-TR-G: Coordination of Move-In/Move-Out Activities and Large Deliveries, and I-TR-H: PM Peak Period Off-Street Loading Access Restrictions**, identified for the proposed project or its variants and described on pp. 4.C.41-4.C.42 and p. 4.C.58, would also be applicable to this alternative to lessen the effect of loading operations on traffic and transit operations.

Emergency Access Impacts

As with the proposed project or its variants, the Reduced Tower Footprint and Height Alternative would not change the configuration or capacity of the travel lanes adjacent to the project site. Therefore, it would not affect emergency vehicle access to the project site or project vicinity. Similar to the proposed project or its variants, the impacts of the Reduced Tower Footprint and Height Alternative on emergency access would be less than significant.

Construction Impacts

Construction activities associated with the Reduced Tower Footprint and Height Alternative would be similar to those described for the proposed project or its variants. Under this alternative construction would occur over a period of approximately 25.5 months, 1.5 months shorter than the 27-month construction period for the proposed project or its variants. As with the proposed project or its variants, the construction-related transportation impacts of this alternative would be less than significant due to their temporary and limited duration. While the construction-related transportation impacts under this alternative would be less than significant, particularly since this alternative would involve less on-site development compared to the proposed project or its variants, **Improvement Measure I-TR-I: Construction Measures**, identified for the proposed project or its variants and described on pp. 4.C.63-4.C.64, would also be applicable to this alternative to reduce its less-than-significant construction-related transportation effects.

Parking Information

Table 6.7: Vehicle Parking Supply and Demand Comparison Proposed Project and Reduced Tower Footprint and Height Alternative presents the parking supply and demand comparisons for the overnight and midday periods for the proposed project or its variants and the Reduced Tower Footprint and Height Alternative. Midday residential parking would be approximately 80 percent of the overnight demand.

Table 6.7: Vehicle Parking Supply and Demand Comparison Proposed Project and Reduced Tower Footprint and Height Alternative

Project/Alternative and Period	Supply	Demand	(Shortfall)/Surplus
Midday			
Proposed Project	262	295	(33)
Reduced Tower Footprint and Height Alternative	187	188	(1)
Overnight			
Proposed Project	262	339	(77)
Reduced Tower Footprint and Height Alternative	187	235	(48)

Source: SF Guidelines 2002, LCW Consulting, 2014.

As shown in **Table 6.7**, the Reduced Tower Footprint and Height Alternative would result in an unmet parking demand of one space during the midday period compared to an unmet parking demand of 33 spaces under the proposed project. The unmet parking demand for the Reduced Tower Footprint and Height Alternative would be less than that for the proposed project or its variants during the midday period because this alternative would not include any café/restaurant or net-new fitness center space. The Reduced Tower Footprint and Height Alternative would result in an unmet overnight parking demand of 48 spaces compared to an unmet parking demand of 98 spaces in the proposed project or 116 spaces under each of the variants.¹⁴ This alternative would not have as substantial an unmet overnight parking demand as the proposed project or its variants due to the fewer number of residential units under this alternative.

As with the proposed project or its variants, some drivers would need to park elsewhere in the area (either on-street or within the Japan Center Garage), which would increase the midday and overnight parking occupancy in the area. Due to difficulty in finding on-street parking in the study area, some drivers may park outside of the study area, switch to transit, carpool, bicycle or other forms of travel. As with the proposed project or its variants, the Reduced Tower Footprint and Height Alternative's unmet midday and overnight parking demand would not be substantial and could be accommodated on-street or in other off-street parking facilities, and the area is well served by public transit and other modes. Therefore, similar to the proposed project or its variants, the unmet parking demand would not create hazardous conditions or significant delays affecting traffic, transit, bicycles or pedestrians under this alternative; however to encourage transit use and reduce parking demand, **Improvement Measure I-TR-B: Transportation Demand Management Plan**, identified for the proposed project or its variants and described on pp. 4.C.42-4.C.43, would also be applicable to the Reduced Tower Footprint and Height Alternative.

¹⁴ This total includes the number of on-street spaces that would be eliminated as a result of the sidewalk widening under the proposed project (21 spaces) and the expansion of that sidewalk widening under each of the variants (39 spaces).

2040 Cumulative Conditions

As shown in **Table 6.6** on p. 6.47, the Reduced Tower Footprint and Height Alternative would generate fewer vehicle trips than would the proposed project or its variants. Under 2040 Cumulative conditions, vehicle delays under the Reduced Tower Footprint and Height Alternative would increase at the study intersections compared to existing conditions, and, as under the proposed project or its variants, all study intersections would operate at LOS D or better during the weekday AM and PM peak hours except the Franklin/O'Farrell intersection (weekday PM peak hour only), which would operate at LOS E under 2040 Cumulative conditions. Like the proposed project or its variants, this alternative would result in a less-than-cumulatively-considerable contribution to significant cumulative impacts at the intersection that operates at LOS E, based on consideration of the alternative's contribution to the critical northbound through/ right movement. Therefore, the Reduced Tower Footprint and Height Alternative's traffic impacts under 2040 cumulative conditions at the study intersections would be less than cumulatively considerable since its contribution to the critical movement would be less than for the proposed project or its variants.

In summary, similar to the proposed project or its variants, under the Reduced Tower Footprint and Height Alternative there would be less-than-significant significant project-level impacts and no cumulatively considerable contribution to significant cumulative impacts related to transportation and circulation.

Noise

The Reduced Tower Footprint and Height Alternative would result in demolition, excavation, and building construction activities that would occur over a total period of approximately 25.5 months, 1.5 months shorter than the 27-month total construction period under the proposed project. As under the proposed project, these activities would temporarily and intermittently increase noise and groundborne vibration in the project vicinity to levels that could be considered an annoyance by occupants of nearby properties, although noise and vibration levels would vary greatly and be limited to the duration of the various construction phases. As with the proposed project, the greatest construction noise and vibration impacts would occur during the demolition, excavation, and basement construction phases (the first 10 months under this alternative as for the proposed project and its variants).

As with the proposed project, demolition, excavation and shoring, and other below-grade work at the western property line would be, at its closest point, about 6 feet, 8 inches from The Sequoias health center facility. In contrast to the proposed project, noise at The Sequoias during base building construction, and exterior and interior finishing of the residential tower, would be slightly lower because the tower would be set back from the west property line by 40 feet

(compared to 10 feet under the proposed project). However, relatively greater noise levels would occur at 1333 Gough Street and at other receptors east of the site and greater vibration levels would occur at 1333 Gough Street because construction of the townhouse structures under this alternative would occur along the Post Street and Geary Boulevard frontages, adjacent to the north and south façades of the existing 1333 Gough Street building.

Construction activities would be required to comply with the San Francisco Noise Ordinance. However, as with the proposed project, noise from construction would still be substantially greater than existing noise levels in the project vicinity, may not meet the requirements of the Noise Ordinance, and could significantly impact nearby sensitive receptors. To ensure construction noise is reduced to the maximum amount feasible and meets the construction noise requirements of the Noise Ordinance, **Mitigation Measure M-NO-1: Construction Noise Control Measures**, identified for the proposed project and described in **Section 4.D, Noise**, pp. 4.D.26-4.D.27, would also be applicable under this alternative. **Mitigation Measure M-NO-1** would require the project contractor to use equipment with lower noise emissions and sound controls where feasible and locate stationary equipment as far as possible from sensitive receptors.

On-site receptors and those at The Sequoias at 1400 Geary Boulevard would be exposed to construction vibration at levels that could exceed the thresholds of annoyance and, conservatively, could cause potential structural damage, similar to the proposed project, because demolition, excavation, and shoring for the subsurface garage would be located the same distance from The Sequoias as with the proposed project. To reduce the impact of construction vibration to the maximum amount feasible, mitigation would be necessary, similar to the proposed project. **Mitigation Measure M-NO-2a: Minimize Vibration Levels During Construction** would mitigate the impact of human annoyance by providing a community liaison to respond to and address complaints, by requiring protective techniques during demolition, and by phasing activities where feasible. To conservatively protect buildings within 10 feet of project demolition, excavation and shoring, and other below-grade work, **Mitigation Measure M-NO-2b: Pre-Construction Assessment to Protect Structures from Ground Vibration during Below-Grade Work** would require a preconstruction assessment, use of smaller equipment for some excavation, and, if needed, shoring of adjacent structures and monitoring during vibration-causing activities to detect ground settlement or lateral movement of structures. As with the proposed project, implementation of these mitigation measures under this alternative would reduce significant project-level construction noise and vibration impacts to less-than-significant levels.

As with the proposed project, noise generated during construction of the Reduced Tower Footprint and Height Alternative could combine with construction noise from the proposed Geary Bus Rapid Transit (BRT) project which would likely employ construction equipment such as jackhammers for pavement breaking, bulldozers for grading, and heavy trucks for material

hauling. The construction activities associated with the proposed Geary BRT project along the adjacent segment of Geary Boulevard would include the repair, replacement, and/or other modifications to the road surface, curbs, or utilities and construction of BRT stations in the public right-of-way. Construction activities for the Geary BRT project would be required to comply with the Noise Ordinance and would be subject to enforcement of the Noise Ordinance by DPW and the Police Department. However, if the construction phases for the proposed Geary BRT project were to overlap with those of the Reduced Tower Footprint and Height Alternative, the closest noise-sensitive receptors could experience significant temporary or periodic cumulative increases in ambient noise. As with the proposed project, implementation of **Mitigation Measures M-NO-1, M-NO-2a, and M-NO-2b** under this alternative would reduce a potentially cumulatively considerable contribution to cumulative construction-related noise and vibration impacts to a less-than-significant level.

Operation of the Reduced Tower Footprint and Height Alternative would introduce additional mobile and fixed noise sources to the area, i.e., new vehicle trips and new mechanical equipment for building utilities, including ventilation equipment (HVAC equipment) and other building mechanical systems. Rooftop mechanical equipment under this alternative would be located at a height of 240 feet, rather than at a height of 398 feet under the proposed project, increasing the potential for operational noise impacts on neighboring properties. Noise generated by stationary equipment would be required to comply with the San Francisco Noise Ordinance, which requires that equipment operating on residential property not produce a noise level more than 5 dBA above the ambient noise level at the property line or its plane.

Under the Reduced Tower Footprint and Height Alternative, there would be fewer net new vehicle trips than with the proposed project because there would be no retail (café) and no renovation of the fitness center. Thus, the increase in traffic noise levels in the project vicinity under this alternative would be less than the increase that would be experienced under the proposed project. As with the proposed project, there would be less-than-significant project-level operational noise impacts and no cumulatively considerable contribution to significant cumulative operational ambient noise levels under this alternative.

As with the proposed project, new residential uses under this alternative would be required to incorporate acoustical insulation or other equivalent measures to reduce interior noise levels to comply with applicable standards under Title 24 and the *San Francisco General Plan Land Use Compatibility Guidelines for Community Noise*. Thus, as with the proposed project, there would be no significant project-level noise impacts or cumulatively considerable contribution to significant cumulative noise impacts on new residents under this alternative.

Air Quality

Similar to the proposed project, the Reduced Tower Footprint and Height Alternative would result in demolition, excavation, and building construction activities that would cause emissions of criteria air pollutants that would affect local air quality. Activities that create dust would be subject to the Construction Dust Control Ordinance. The construction activities, equipment, and phasing under this alternative would be similar to those of the proposed project. However, construction-related emissions under this alternative would be slightly less than those under the proposed project due to the reduction in the number of construction truck trips necessary to haul excavated materials off site (from 83,000 cubic yards under the proposed project to 71,000 cubic yards under this alternative). This alternative would result in construction emissions of criteria air pollutants that would be above the applicable significance thresholds, requiring mitigation, as under the proposed project. Toxic air contaminants (TACs) emitted during construction would not expose sensitive receptors to substantial pollutant concentrations, as under the proposed project. Implementation of **Mitigation Measure M-AQ-1: Construction Emissions Minimization**, identified for the proposed project and described on pp. 4.E.30-4.E.31, would be applicable to this alternative. This mitigation measure, which calls for the development of a construction emissions minimization plan, would reduce construction emissions and the construction-related emissions impacts of this alternative on nearby sensitive receptors to a less-than-significant level.

Sources of operational emissions for this alternative would include a back-up emergency generator, other mechanical systems, and new motor vehicle trips with emissions from mobile sources. Due to fewer residential units and no retail or expanded health club uses, operational emissions for the Reduced Tower Footprint and Height Alternative would be similar to, but less than, those of the proposed project. The emissions from mobile sources would be slightly less than those of the proposed project, because of the lower travel demand from fewer residential units under this alternative. As with the proposed project, the project sponsor would be required to obtain applicable permits to operate an emergency generator from the BAAQMD. Thus, operational criteria air pollutant emissions would be below the thresholds of significance and would not violate any air quality standard or contribute substantially to a violation of a standard.

Under this alternative, as with the proposed project, the new residential land use would be developed in an area that does not experience high levels of air pollution. Thus, this alternative would result in a less-than-significant impact with respect to exposing sensitive receptors to substantial pollutant concentrations.

As with the proposed project, the Reduced Tower Footprint and Height Alternative would not conflict with or obstruct implementation of the applicable air quality plan, and this alternative would not expose a substantial number of people to objectionable odors.

Project-level criteria air pollutant emissions at levels below the thresholds are not anticipated to contribute to an air quality violation or result in a cumulatively considerable net increase in criteria air pollutants. No additional mitigation would be necessary for cumulative air quality impacts. Similar to the proposed project, construction or operation of this alternative, in combination with other reasonably foreseeable projects in the project vicinity, would not expose sensitive receptors to substantial pollutant concentrations. Therefore, as with the proposed project, there would be less-than-significant (with mitigation incorporated) project-level impacts and no cumulatively considerable contribution to significant cumulative impacts related to air quality under the Reduced Tower Footprint and Height Alternative.

Wind

Like the proposed project, the 240-foot-tall Reduced Tower Footprint and Height Alternative was tested in an atmospheric boundary layer wind tunnel. This alternative would not result in substantial changes to ground-level wind conditions in the project vicinity. Under this alternative, the average wind speed at the 54 test points would remain substantially unchanged from existing conditions at around 12 mph, the number of exceedances of the wind comfort criterion would increase from 30 to 31, and there would be no exceedances of the wind hazard criterion. This alternative would result in some wind comfort exceedances that would not occur under the proposed project; these exceedances would occur near the northwest corner of the proposed tower and near the northeast corner of the existing health center at The Sequoias. Other exceedances of the wind comfort criterion under this alternative would be in the same general locations as those that would occur under the proposed project. As with the proposed project, this alternative would result in winds on the south side of Geary Boulevard that approach but would not exceed the wind hazard criterion. Like the proposed project, the Reduced Tower Footprint and Height Alternative would have a less-than-significant project-level wind impact and a less-than-significant cumulatively considerable contribution to significant cumulative wind impacts.

Shadow

The 240-foot-tall Reduced Tower Footprint and Height Alternative, which is 158 feet shorter than the proposed project, would result in reduced shadow impacts when compared to the proposed project. This alternative would shadow two parks, whereas the proposed project would shadow six parks. The Reduced Tower Footprint and Height Alternative would shadow Peace Plaza, Cottage Row Mini Park, and public sidewalks in the project vicinity at the same time of day and during the same times of year as would the proposed project. This alternative would not shadow four parks (the Hamilton Recreation Center, Raymond Kimbell Playground, Gene Suttle Plaza, and Fillmore Center Plaza) that would be shadowed by the proposed project. Regarding the two parks that would be shadowed by this alternative, the net new shadow from this alternative would cover the same general areas as the net new shadow from the proposed project. Depending on the

time of day, the duration of the net new shadow would be shorter under this alternative due to its reduced height (i.e., the shorter building height would result in a shorter shadow that would move off the park sooner than a longer shadow). Like the proposed project, the Reduced Tower Footprint and Height Alternative would have a less-than-significant project-level shadow impact and a less-than-significant cumulatively considerable contribution to significant cumulative shadow impacts.

Other Topics

The NOP/IS and public scoping process concluded that the proposed project would have no impacts, less-than-significant impacts, or less-than-significant impacts with mitigation in the following analysis areas:

- Land Use and Land Use Planning (Physically Divide an Established Community, only);
- Population and Housing;
- Cultural and Paleontological Resources;
- Greenhouse Gas Emissions;
- Recreation;
- Utilities and Service Systems;
- Public Services;
- Biological Resources;
- Geology and Soils;
- Hydrology and Water Quality;
- Hazards/Hazardous Materials;
- Mineral/Energy Resources; and
- Agricultural and Forest Resources.

The Reduced Tower Footprint and Height Alternative would occupy the same building site as the proposed project and would include residential land uses and a similar (but lessened) residential intensity of uses on the site. Impacts under this alternative for each of the above-noted environmental topics would be substantially similar to those of the proposed project. The Reduced Tower Footprint and Height Alternative would not result in any new potentially significant impacts for the environmental topics identified in the NOP/IS for the proposed project. The mitigation measures and improvement measure presented in the NOP/Initial Study for the proposed project (**Mitigation Measure M-CP-2: Archaeological Testing, Monitoring, Data Recovery and Reporting; Mitigation Measure M-CP-3: Paleontological Resources Monitoring and Mitigation Program; Mitigation Measure M-HZ-2: Hazardous Building Materials Abatement Site Assessment and Corrective Action for All Sites; and Mitigation**

Measures M-HZ-1b: Hazardous Building Materials Abatement) would also be applicable under the Reduced Tower Footprint and Height Alternative. Therefore, the conclusions in the NOP/IS with respect to the above environmental topics would be less than significant or less than significant with mitigation under the Reduced Tower Footprint and Height Alternative.

CONCLUSION

The Reduced Tower Footprint and Height Alternative would not require amendment of the existing 240-E height and bulk limitations. However, like the proposed project, the Reduced Tower Footprint and Height Alternative would result in less-than significant project-level and cumulative land use and land use planning impacts. It would include the fewest dwelling units of all of the alternatives. As with the proposed project, the Reduced Tower Footprint and Height Alternative would result in less-than-significant impacts related to transportation and wind and shadow (before mitigation), and less-than-significant impacts related to noise and air quality (with mitigation measures).

Relationship to Project Objectives

For the purposes of selecting alternatives for inclusion and study within the EIR under *CEQA Guidelines* §15126.6, the Reduced Tower Footprint and Height Alternative could feasibly attain most of the project sponsor's basic objectives of the proposed project, as presented in **Chapter 2, Project Description**, on pp. 2.2-2.3.

The alternative would improve the pedestrian environment of Cathedral Hill by replacing the existing above-grade parking garage with a high-quality residential project. The alternative would not promote a variety of the project sponsor's objectives as fully as the proposed project due to its smaller overall square footage and unit count. It would provide 75 fewer residential units than the proposed project and fewer affordable units under Planning Code § 415. The alternative would not provide as many family-sized units (units that contain two or more bedrooms) as the proposed project (126 units under the proposed project versus 72 under this alternative). As such, the alternative would also not promote the project sponsor's objective to provide high density housing on the planned Geary BRT line as fully as the proposed project. The alternative would not promote the project sponsor objective of activating the pedestrian environment by providing additional pedestrian traffic during day and evening hours as fully as the proposed project, because it would not provide the café and fitness center as under the proposed project, and because it would contain fewer overall residential units.

F. ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA Guidelines §15126.6(e)(2) requires identification of an environmentally superior alternative (the alternative that has the fewest significant environmental impacts) from among the other alternatives evaluated if the proposed project has significant impacts that cannot be mitigated to a less-than-significant level. This EIR identifies no significant and unavoidable impacts of the proposed project. However, for the purpose of informed decision-making, this discussion identifies the alternative that would result, overall, in the greatest reduction of the less-than-significant impacts of the proposed project (other than the No Project Alternative).

On balance, the Reduced Tower Footprint and Height Alternative would result in the greatest overall reduction of less-than-significant impacts identified for the proposed project. It would include the fewest dwelling units of all of the alternatives (the fewest number of affordable units). Above-ground new construction and construction activities would be located at the greatest distance from the neighboring Sequoias property. It would result in reduced less-than-significant impacts related to transportation and circulation, and would also result in reduced potentially significant (less-than-significant after mitigation) impacts related to air quality. Less-than-significant construction noise impacts would be slightly reduced at the eastern end of The Sequoias but would be slightly increased at 1333 Gough Street and would affect a greater number of residents there. With a reduced footprint and lower height, this alternative would result in less annual net new shadow on Recreation and Park properties.

G. ALTERNATIVES CONSIDERED BUT REJECTED

Section 15126.6(c) of the *CEQA Guidelines* provides that an EIR should “identify any alternatives that were considered by the lead agency but rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency’s determination.” Comments on the NOP/IS, published on June 12, 2013, include a number of suggestions for EIR alternatives. The screening process for identifying viable EIR alternatives included consideration of the following criteria: ability to meet the project objectives; potential ability to substantially lessen or avoid environmental effects associated with the proposed project; and potential feasibility. The discussion below describes the alternatives suggested by comments on the NOP, and provides the reasons for eliminating these alternatives from detailed consideration in the EIR.

REPLACEMENT CONSTRUCTION FOR THE EXISTING 1333 GOUGH STREET BUILDING ALTERNATIVE

Eastern Project Site Alternative

This alternative would concentrate new development on the eastern portion of the project site by demolishing 1333 Gough Street and constructing a residential building of the same size, height,

and form as the proposed project on the portion of the project site currently improved by 1333 Gough Street. Upon completion of construction, the project site would be improved with a single 262-unit, 36-story, 398-foot-tall (416 feet tall including a mechanical penthouse), 429,310-square-foot residential building. As compared to the proposed project, the centerline of the building would approximately 300 feet further from The Sequoias. The existing above-grade parking garage located on the western portion of the project site would be retained. 1333 Gough Street is subject to the rent and eviction control requirements of the San Francisco Rent Stabilization and Arbitration Ordinance, Chapter 37 of the San Francisco Administrative Code (the Rent Ordinance). Prior to the demolition of 1333 Gough Street, the existing tenants of the building would be evicted pursuant to the requirements of the Rent Ordinance.

This potential EIR alternative was considered but not selected for analysis in this EIR because it would not achieve a variety of the project sponsor's basic objectives, including those related to maintaining the existing housing stock on the project site, removing an existing above-grade parking garage, and maximizing the opportunity to create high-density housing near the Van Ness Avenue corridor. As the alternative would involve the demolition of the 169 existing rent-controlled apartments in 1333 Gough, the alternative would arguably conflict with certain policies of the *San Francisco General Plan* calling for the retention of existing housing stock. In addition, the potential EIR alternative would have environmental impacts similar to those of the proposed project. By shifting the location of the residential building approximately 300 feet to the east of the proposed project, the potential EIR alternative would reduce certain construction-related environmental effects to residents of The Sequoias, but it would increase those effects as experienced by residents located to the east and north of the project site as compared to the proposed project, although it is not expected that resulting construction impacts would be significant.

1333 Gough Street Demolition and Replacement Alternative

This alternative would be substantially similar to the Eastern Project Site Alternative, and would include construction of a residential building of the same size, height, and form as the proposed project on the portion of the project site currently improved by 1333 Gough Street. In order to protect residents of 1333 Gough Street from displacement, however, this alternative would additionally involve construction of a new residential building prior to demolition of 1333 Gough Street on the western portion of the project site currently improved with the existing above-grade garage and tennis courts. The residential building would contain approximately the same number of units and square footage as 1333 Gough Street. Existing tenants of 1333 Gough Street would be relocated to this new residential building prior to demolition of 1333 Gough Street. The new apartments would be rented at the same rent-controlled rate as the residents' existing apartments at 1333 Gough Street prior to demolition.

The suggested EIR alternative was considered but not selected for analysis in this EIR because it would not substantially reduce environmental impacts as compared to the proposed project. The suggested 1333 Gough Street demolition and replacement alternative would involve the construction of two residential buildings, rather than one, on the project site and would generate more construction-related environmental effects than the proposed project.

ADDITION TO THE EXISTING 1333 GOUGH STREET BUILDING ALTERNATIVE

This alternative would involve the renovation and expansion of 1333 Gough Street, with the construction of a new addition to 1333 Gough Street on the west side of 1333 Gough Street. The existing above-grade parking garage located on the western portion of the project site would be retained, or demolished and replaced with a new underground parking structure. This potential EIR alternative was considered but not selected for analysis in this EIR because it would not substantially reduce environmental impacts as compared to the proposed project and the other alternatives selected for analysis in the EIR. The proposed alternative would create environmental effects similar to those with the proposed project, including construction-related air quality and noise effects. By shifting the location of the residential addition closest to the eastern portion of the developable project site, the potential EIR alternative may slightly reduce certain construction-related environmental effects to residents of The Sequoias, but it would increase those effects as experienced by residents located at 1333 Gough Street building (including loss of western-facing windows) and to the north of the project site as compared to the proposed project.

GEARY BOULEVARD ACCESS ALTERNATIVE

Comments on the NOP/IS suggest an alternative in which all passenger and delivery vehicles would enter from, and exit to, Geary Boulevard, and in which open space and a fitness center addition would be located along Post Street. The existing median and width of Geary Boulevard would prohibit access from, and exit to, the eastbound lanes on the south side of Geary Boulevard and would result in circling the long project block and/or illegal U-turn movements for vehicles approaching the project site from the west on Geary Boulevard or exiting the project site to head east on Geary Boulevard. The suggested access alternative would conflict with operational and physical improvements to improve Muni bus service along the Geary corridor contemplated under the Geary BRT project. Construction impacts on surrounding properties related to transportation and circulation, noise, and air quality would be substantially similar to those described in this EIR for the proposed project. This alternative would not reduce any of the impacts of the proposed project and thus would not meet any of the requirements of *CEQA Guidelines* § 15126.6.

OFF-SITE ALTERNATIVE

An off-site alternative was eliminated from consideration as an alternative to the proposed project. The project site is already owned and operated by the project sponsor. To the extent that other suitable development sites may exist in the northwestern quadrant of the City, the project sponsor holds no ownership, option, or development interest in any such parcel and has not indicated any plans to acquire such development rights in the near future. As such, an off-site alternative would not feasibly attain any of the project's basic objectives. Additionally, relocation of the proposed development to a comparable off-site location would not substantially lessen or avoid impacts associated with construction of new infill development within a densely populated, residential urban neighborhood, but would relocate those impacts to a different densely populated, residential urban neighborhood.

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APPENDIX A: NOP/INITIAL STUDY



SAN FRANCISCO PLANNING DEPARTMENT

Notice of Preparation of an Environmental Impact Report

Date: June 12, 2013
Case No.: 2005.0679E
Project Title: 1333 Gough Street/1481 Post Street Project
Zoning: RM-4 (Residential, Mixed, High Density) Use District
240-E Height and Bulk District
Block/Lot: Assessor's Block 697/Lot 37
Lot Size: 80,864 square feet
Project Sponsor: ADCO and Cathedral Hill Plaza Associates, L.P.
Lead Agency: San Francisco Planning Department
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PROJECT DESCRIPTION

The project site is located on the south side of Post Street near the intersection of Post and Gough Streets in Cathedral Hill, at the eastern edge of the Japantown neighborhood, in the City's Western Addition. The project site is a single lot encompassing all of Assessor's Block 697/Lot 37, bounded by Post Street on the north, Gough Street on the east, Geary Boulevard on the south, and its west property line. The eastern portion of the project site is currently developed with an existing residential building, 1333 Gough, constructed in 1965 (169 units, 14 stories, about 138 feet tall, and 214,400 gross square feet [gsf] of residential use). An existing parking garage structure (163 spaces, 65,100 gsf) wraps around the ground floor base of 1333 Gough to its north, west, and south. Two surface parking lots at the northeast and southeast corners of the project site together provide 13 spaces. The private, members-only Cathedral Hill Plaza Athletic Club operates a fitness center (about 4,700 gsf) in the ground floor of 1333 Gough Street. A terrace for the residents of 1333 Gough Street, two outdoor tennis courts, and a one-story pool building (permanently closed in February of 2010) are located on the roof of the parking structure.

The project sponsors propose demolition of the existing parking structure (together with the common open space terrace, tennis courts, and pool building that sit atop the parking structure) and construction of a new 262-unit, 36-story, 416-foot-tall (including mechanical penthouse), 429,310-gsf residential building (the proposed 1481 Post Street building) west of 1333 Gough Street on the project site. The new building (1481 Post Street) would include a 2,460-gsf café along Post Street at the northwest corner of the project site. Along the west property line on the project site, the proposed project would include a 10-foot-wide, publicly accessible walkway that would facilitate midblock pedestrian passage between Post Street and Geary Boulevard.

The proposed project also includes construction of a subsurface parking garage (about 180,000 gsf) to serve the residents of the new 1481 Post Street building and existing 1333 Gough Street. The four-level 1481 Post Street portion of the proposed parking garage would occupy the western portion of the project site. It would include 262 independently accessible parking spaces that would have access from, and egress to, Post Street. The two-level 1333 Gough Street portion of the garage would generally occupy the eastern portion of the project site. It would include 176 independently accessible parking spaces and 4 carshare spaces that would have access from, and egress to, Post Street and Gough Street at the northeast corner of the project site. The proposed project would include two freight loading spaces, one for each building, to be entered from Geary Boulevard and exited onto Post Street.

The proposed project includes renovation of the existing fitness center at the ground floor of 1333 Gough Street and construction of a new indoor swimming pool addition (about 8,000 gsf) fronting Geary Boulevard. The upgraded facility would continue to be open to the public for membership. The existing tennis courts would not be replaced under the proposed project. A common second floor open space terrace for the residents of the proposed 1481 Post Street building would be provided atop the loading area, the 1481 Post Street garage ramp and driveway, and the proposed pool addition. Another common open space for 1481 Post Street residents would be provided atop the proposed café. A separate common open space garden for residents of 1333 Gough Street would be provided at ground level along Gough Street.

Approvals required for the proposed project include, but are not limited to, the following: a determination under Planning Code Section 295 that net new shadow on Recreation and Park Commission properties would not be adverse to the use of the parks; approval of a Planned Unit Development to allow exceptions to provisions of the Planning Code governing rear yard depth, dwelling unit exposure, and residential density; adoption of a Zoning Map amendment to reclassify the existing 240-E height and bulk limit for the project site to a 410-G height and bulk limit; and adoption of a *General Plan* amendment to revise the 240-foot height limit and the bulk controls for the project site.

FINDING

This project may have a significant effect on the environment and an Environmental Impact Report is required. This determination is based upon the criteria of the State CEQA Guidelines, Sections 15063 (Initial Study), 15064 (Determining Significant Effect), and 15065 (Mandatory Findings of Significance), and for the reasons documented in the Environmental Evaluation (Initial Study) for the project, which is attached.

ALTERNATIVES

Alternatives to be considered for this project will include, but not be limited to, the No Project Alternative and one or more alternatives that reduce or avoid impacts of the proposed project. This determination is based upon the criteria of the State CEQA Guidelines, Section 15126.6 (Consideration and Discussion of Alternatives to the Proposed Project).

PUBLIC SCOPING PROCESS

Written comments will be accepted until 5:00 p.m. on **July 12, 2013**. Written comments should be sent to Sarah B. Jones, San Francisco Planning Department, 1650 Mission Street, Suite 400, San Francisco, CA 94103.

If you work for a responsible State agency, we need to know the views of your agency regarding 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.

June 12, 2013

Date



Sarah B. Jones
Acting Environmental Review Officer

INITIAL STUDY
1333 GOUGH STREET / 1481 POST STREET PROJECT
PLANNING DEPARTMENT CASE NO. 2005.0679E

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ACRONYMS AND ABBREVIATIONS

AB	Assembly Bill
ABAG	Association of Bay Area Governments
ADRP	archaeological data recovery plan
AMP	archaeological monitoring program
ARB	California Air Resources Board
ARD/TP	Archaeological Research Design and Treatment Plan
ATCM	Asbestos Airborne Toxic Control Measure
ATP	archaeological testing plan
AWSS	Auxiliary Water Supply System
BAAQMD	Bay Area Air Quality Management District
bgs	below ground surface
BMR	Below Market Rate
BRT	Bus Rapid Transit
CCR	California Code of Regulations
CDFW	California Department Fish and Wildlife
CDMG	California Division of Mines and Geology
CEQA	California Environmental Quality Act
CFGC	California Fish and Game Code
CH ₄	methane
CGS	California Geological Survey
CO	carbon monoxide
CO ₂	carbon dioxide
CO ₂ E	carbon dioxide-equivalent
CPMC	California Pacific Medical Center
CRHR	California Register of Historical Resources
CSO	combined sewer overflow
DBI	Department of Building Inspection
DPH	San Francisco Department of Public Health
DPW	Department of Public Works
EIR	Environmental Impact Report
EMS	emergency medical service
ERO	Environmental Review Officer
ESA	Environmental Site Assessment
FARR	Final Archaeological Resources Report
FEMA	Federal Emergency Management Agency
FIRMs	Flood Insurance Rate Maps
FTE	full time equivalents
GHG	greenhouse gas
gpf	gallons per flush
gpm	gallons per minute
gsf	gross square feet
HAZNET	Hazardous Waste Information System
HOA	Homeowner's Association
JCHESS	Japantown Cultural Heritage and Economic Sustainability Strategy
LEED	Leadership in Energy and Environmental Design
MBTA	Migratory Bird Treaty Act
MLD	Most Likely Descendant
MMTCO ₂ E	million gross metric tons of CO ₂ E

MPOs	Metropolitan Planning Organizations
MRZ-4	Mineral Resource Zone 4
Mw	Moment magnitude
NAHC	Native American Heritage Commission
NFIP	National Flood Insurance Program
NOA	naturally occurring chrysotile asbestos
NOP	Notice of Preparation
NO ₂	nitrogen dioxide
NPDES	National Pollutant Discharge Elimination System
N ₂ O	nitrous oxide
NWIC	Northwest Information Center
OPR	Office of Planning and Research
PCB	polychlorinated biphenyls
PG&E	Pacific Gas & Electric
PM	particulate matter
PRMMP	Paleontological Resources Monitoring and Mitigation Program
PUD	Planned Unit Development
RHND	Regional Housing Needs Determination
RTPs	regional transportation plans
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SFBAAB	San Francisco Bay Area Air Basin
SFFD	San Francisco Fire Department
SFPD	San Francisco Police Department
SFPUC	San Francisco Public Utilities Commission
SFUSD	San Francisco Unified School District
SMO	Stormwater Management Ordinance
SO ₂	sulfur dioxide
sq. ft.	square feet
SWPPP	Stormwater Pollution Prevention Plan
TEP	Transit Effectiveness Project
TRIS / FINDS	Toxic Chemical Release Inventory System / Facility Index System
USEPA	United States Environmental Protection Agency
USGS	United States Geological Survey

INITIAL STUDY

1333 GOUGH STREET / 1481 POST STREET PROJECT

PLANNING DEPARTMENT CASE NO. 2005.0679E

A. PROJECT DESCRIPTION

Project Location

The project site is located on the south side of Post Street near the intersection of Post and Gough Streets in Cathedral Hill, at the eastern edge of the Japantown neighborhood, in the City's Western Addition. (See Figure 1: Project Location.) It is a single lot encompassing all of Assessor's Block 697/Lot 37, bounded by Post Street on the north, Gough Street on the east, Geary Boulevard on the south, and its west property line. The rectangular project site measures about 411 feet from east to west and about 197 feet north to south, encompassing an area of approximately 80,864 square feet (sq. ft.) or 1.86 acres. The site currently is improved with a multi-family residential building at the eastern end of the project site, known as 1333 Gough Street, which is the current address associated with the entire project site. (The 1481 Post Street address used in this document refers to the proposed residential building that would be constructed at the western end of the project site under the proposed project.)

The project site is entirely within the RM-4 (Residential Mixed, High Density) District and the 240-E Height and Bulk District. It was once within the former Western Addition A-1 Redevelopment Area, which expired in May 2000. The project site is owned by Cathedral Hill Associates, L.P., an affiliate of ADCO (the project sponsor).

The project site is currently occupied by an existing residential building, common and private open space, a parking structure, two surface parking lots, and a private fitness center, which includes exercise facilities in the 1333 Gough Street building and outdoor tennis courts, and a swimming pool building (now closed) atop the parking structure. Together, existing uses on the project site total about 284,200 gross square feet (gsf), as shown in Table 1: Existing Uses on the Project Site.

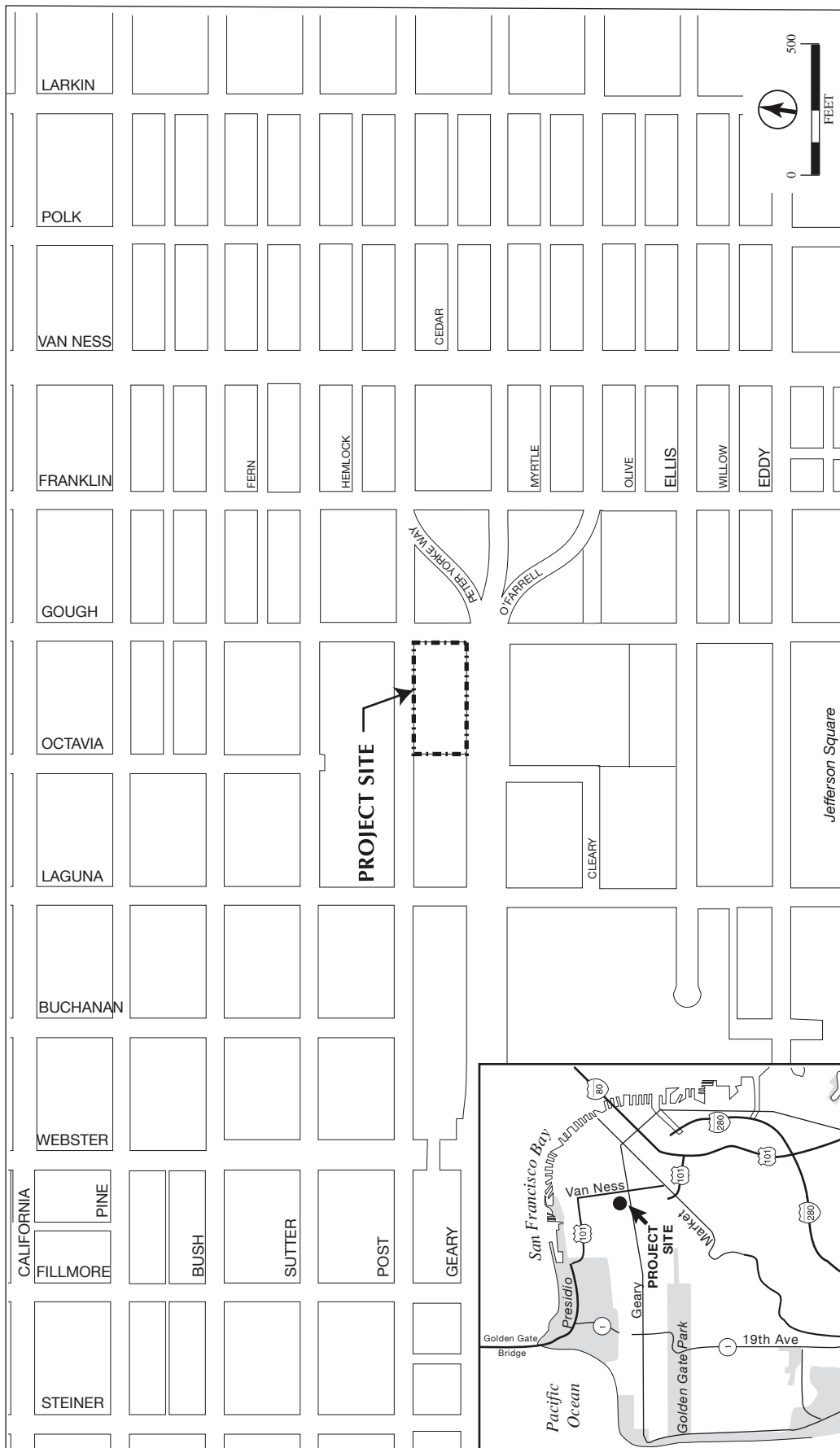


FIGURE 1: PROJECT LOCATION

SOURCE: Turnstone Consulting

1333 GOUGH STREET/1481 POST STREET

2005.0679E

Table 1: Existing Uses on the Project Site

Use	Gross Square Feet
Residential	214,400 gsf
Parking Structure	65,100 gsf
Fitness Center	4,700 gsf
Total gsf	284,200 gsf

Source: Cathedral Hill Plaza Associates, 2013

1333 Gough Street

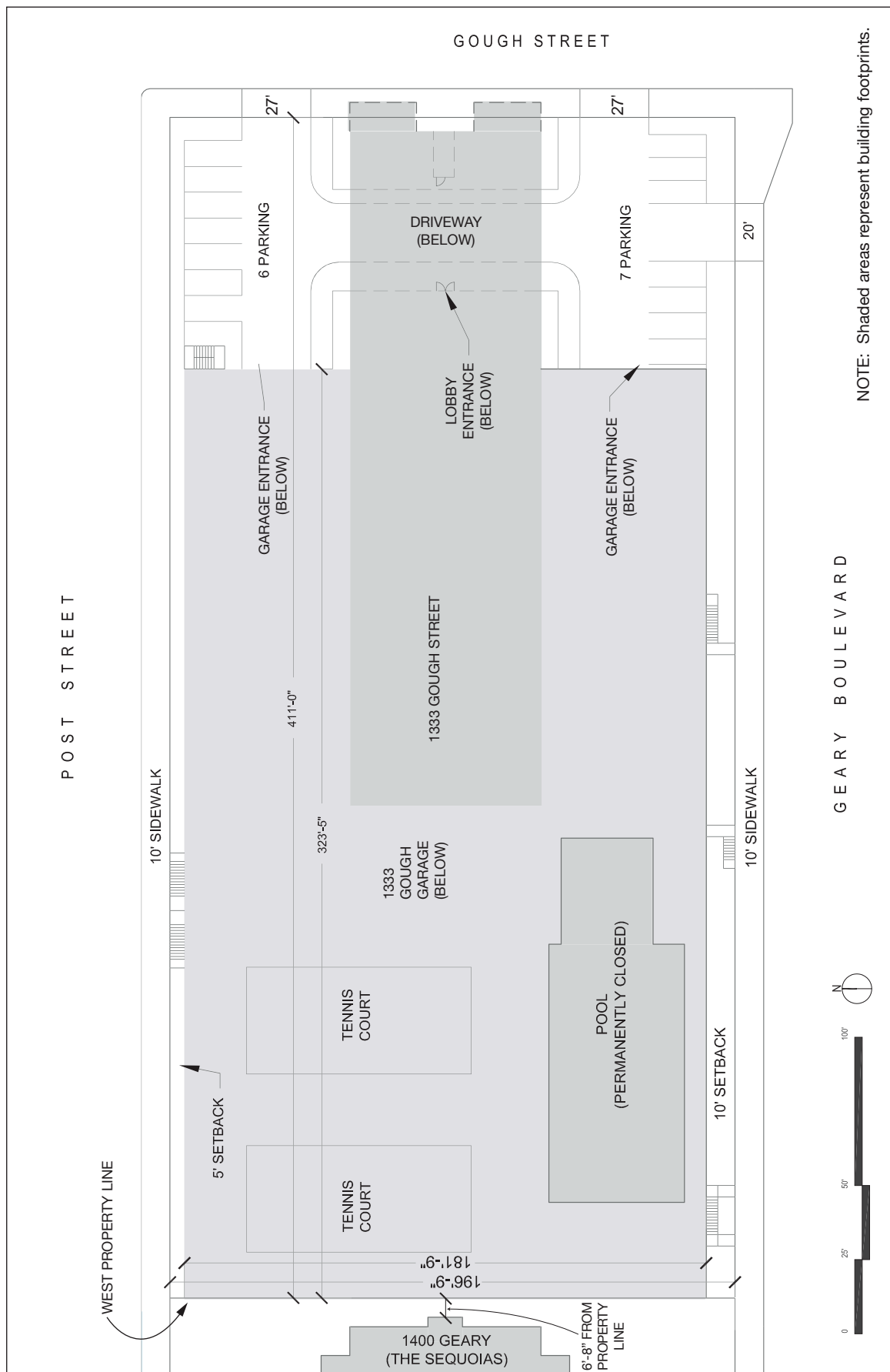
The eastern portion of the project site is currently occupied by a 169-unit, 14-story (about 138-foot-tall), 214,400-gsf apartment building (1333 Gough Street), constructed in 1965 under the former Western Addition A-1 Redevelopment Plan. The existing building contains about 188,900 gsf of residential use, 3,700 gsf of lobby space, and about 17,100 gsf of building services/mechanical and storage space. The building also contains a 4,700-gsf fitness center (discussed below as a separate use).

The 235-foot length of the building slab is oriented east-west, running parallel to Post Street to the north and Geary Boulevard to the south. (See Figure 2: Existing Site Plan.) The eastern end of the building slab (about one-quarter of the building's length) is raised on piles, creating a covered area beneath the raised eastern end of the building. The building's lobby entrance at the ground floor faces east onto this covered area and is set back from the Gough Street sidewalk and the eastern face of the building above by about 55 feet, creating a sheltered porte-cochere¹ at the building's entrance. A passenger drop-off at the lobby entrance is accessed from a grade-level driveway that runs beneath the raised eastern end of the building and connects to Gough Street by curb cuts at its north and south ends.

Parking

The existing structured parking on the project site contains 163 spaces, and the two surface parking lots provide 13 spaces, for a total 176 spaces. The parking structure occupies a total of about 65,100 gsf of building area.

¹ Porte-cochere is a roofed structure extending from the entrance of a building over an adjacent driveway sheltering those getting in or out of vehicles.



NOTE: Shaded areas represent building footprints.

GEARY BOULEVARD



SOURCES: SLCE Architects / MWA Architects

1333 GOUGH STREET/1481 POST STREET

2005.0679E

FIGURE 2: EXISTING SITE PLAN

The existing two surface parking lots are located at the northeast and southeast corners of the project site. Access to and egress from the parking lot at the northeast corner of the project site is from Gough Street. Access to and egress from the parking lot at the southeast corner of the project site is from Gough Street as well as from Geary Boulevard. A two-way driveway running north/south beneath the raised eastern end of the building (discussed above) connects the two parking lots.

West of the surface parking lots, along the north and south sides of 1333 Gough Street and at the western portion of the project site, is an existing parking structure. The parking structure is U-shaped in plan and wraps around the ground-floor base of 1333 Gough Street to its north, west, and south. The parking structure is accessed from the two surface parking lots on the project site.

The first level of parking is located along the north and south sides, and a portion of the western end of 1333 Gough Street at grade along Post Street and Geary Boulevard, respectively. The second level of parking is located at the western end of the project site (below the existing tennis courts), one-half level down by ramp from the first level. The second level is partially above grade and partially below grade. A third level of parking is located below grade, one-half level down by ramp from the second level.

Fitness Center

The private, members-only Cathedral Hill Plaza Athletic Club operates a fitness center (about 4,700 gsf) in the first floor of 1333 Gough Street. The fitness center is accessible through the building's lobby entrance. Current fitness center membership is about 200.

Atop parking level 2 at the western portion of the project site are two outdoor tennis courts (about 17,300 gsf), accessible via the fitness center. The tennis courts are used by about 25 people per week. Also atop the parking structure at the west end of the project site is a one-story pool building (about 5,200 gsf). The pool facility was permanently closed in February of 2010.

Common and Private Residential Open Space

About 42,000 sq. ft. of common open space is available to building residents on the rooftop of the one-story parking structure that wraps around the base of 1333 Gough Street along its north, west, and south façades. The common open space is accessible from the second floor of 1333 Gough Street through doorways roughly at the midpoint of the building's south façade and at the southwest corner of 1333 Gough Street.

Existing private open space (totaling about 18,740 sq. ft.) is provided in the form of private terraces on the rooftop of the parking garage structure for 13 units at the 2nd floor (totaling about 4,916 sq. ft.), and private balconies for 144 units at the 3rd through 14th floors (totaling about

13,824 sq. ft.). One unit on each of the 3rd through 14th floors (12 units) has no private open space and is served by the existing common open space on the roof of the garage structure.

Project Characteristics

The proposed project includes demolition of the existing parking garage structure, construction of a new 262-unit, 36-story, residential building (the proposed 1481 Post Street building), modifications to 1333 Gough Street, and construction of a new subsurface parking garage, as described below. (See Table 2: Summary of Existing and Proposed Uses on the Project Site.)

Table 2: Summary of Existing and Proposed Uses on the Project Site

Uses	Existing Uses	Existing Uses to Be Retained	New Construction/ Addition	Project Totals
Residential	214,400 gsf	214,400 gsf	429,310 gsf	643,710 gsf
Fitness Center	4,700 gsf ¹	4,700 gsf ¹	8,000 gsf	12,700 gsf
Parking	65,100 gsf	0 gsf	180,000 gsf	180,000 gsf
Café	0 gsf	NA	2,460 gsf	2,460 gsf
Total gsf	284,200 gsf	219,100 gsf	619,770 gsf	838,870
Dwelling Units	169 units	169 units	262 units	431 units
Parking Spaces				
Residential	169 spaces	0 spaces ²	431 spaces	431 spaces
Visitor	7 spaces	0 spaces ²	7 spaces	7 spaces
Carshare	0 spaces	NA	4 spaces	4 spaces
Total Spaces	176 spaces	0 spaces	442 spaces	442 spaces
Loading Spaces	0 spaces	NA	2 spaces	2 spaces

Notes: ¹ The existing pool building is not included in this amount, as it was permanently closed in 2010. The existing tennis courts are not included in this amount, as they are unclosed, outdoor space.

² The existing parking spaces within the existing parking structure at 1333 Gough Street would be demolished and would be replaced in a proposed new parking structure that would be constructed under the proposed project.

Sources: SLCE Architects and MWA Architects

Proposed 1481 Post Street Building Uses

Residential

The proposed 262-unit 1481 Post Street building's residential use (429,310 gsf total) would consist of approximately 136 one-bedroom units, 86 two-bedroom units, 36 three-bedroom units, and 4 four-bedroom units (in addition to building circulation, amenities, mechanical space, and building services).

Residential pedestrian access to the ground floor of the proposed building would be through lobby entrance doors that would be located on the north side of the proposed 1481 Post Street building facing Post Street, set back from Post Street by about 47 feet. (See Figure 3: Proposed Ground Floor Plan.) The ground-floor lobby would be 3,329 gsf. The ground floor would also include a fitness center (5,750 gsf) for building residents, and building services (e.g., management office, mail room, trash and recycling area) totaling 1,950 gsf.

From the ground-floor lobby, residents would access elevators or stairs to the upper floors. The second floor would include additional amenities for building residents (including a swimming pool and spa tub, event space, resident lounge, play room, and screening room) totaling 12,224 gsf. (See Figure 4: Proposed 2nd Floor Plan.)

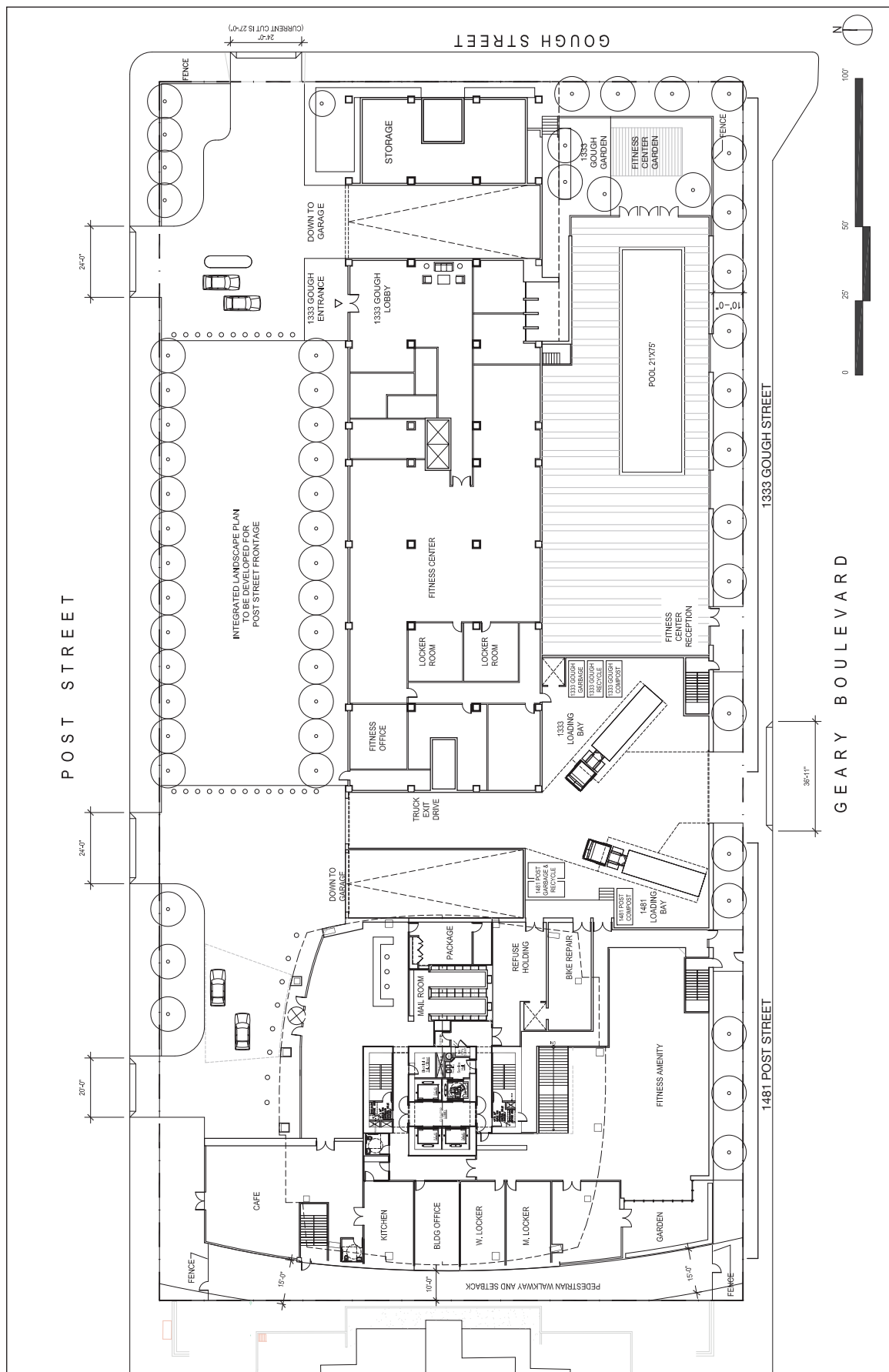
Residential units would be located on the 3rd through the 36th floors. (See Figure 5: Proposed Representative 3rd Floor through 29th Floor Tower Plan; Figure 6: Proposed Representative 30th Floor through 32nd Floor Tower Plan; Figure 7: Proposed Representative 33rd Floor through 35th Floor Tower Plan; Figure 8: Proposed Representative 36th Floor Tower Plan; and Figure 9: Proposed Mechanical and Penthouse Plan.) Residential floors would also include shared circulation and common areas (totaling 26,687 gsf) and mechanical space (totaling 42,024 gsf).

Residential Open Space

Private open space for two of the 262 proposed residential units within the 1481 Post Street building would be provided in two private terraces at the 30th floor (totaling 404 sq. ft.) (see Figure 9 on p. 14). The remaining 260 units within the proposed 1481 Post Street building would be served by new common open space (totaling 14,953 sq. ft.) that would be provided as follows: a proposed garden (771 sq. ft.) at the southwest corner of the project site, accessible through the proposed fitness center amenity at the ground floor (see Figure 3 on p. 8); a proposed terrace (1,043 sq. ft.) atop the proposed café along Post Street at the northwest corner of the project site, accessible through amenity space at the second floor (see Figure 4 on p. 9); and a proposed terrace (13,139 sq. ft.) built atop the podium containing the proposed 1481 Post Street building's garage ramp, the proposed loading area, and the proposed new pool addition to 1333 Gough Street.

Café

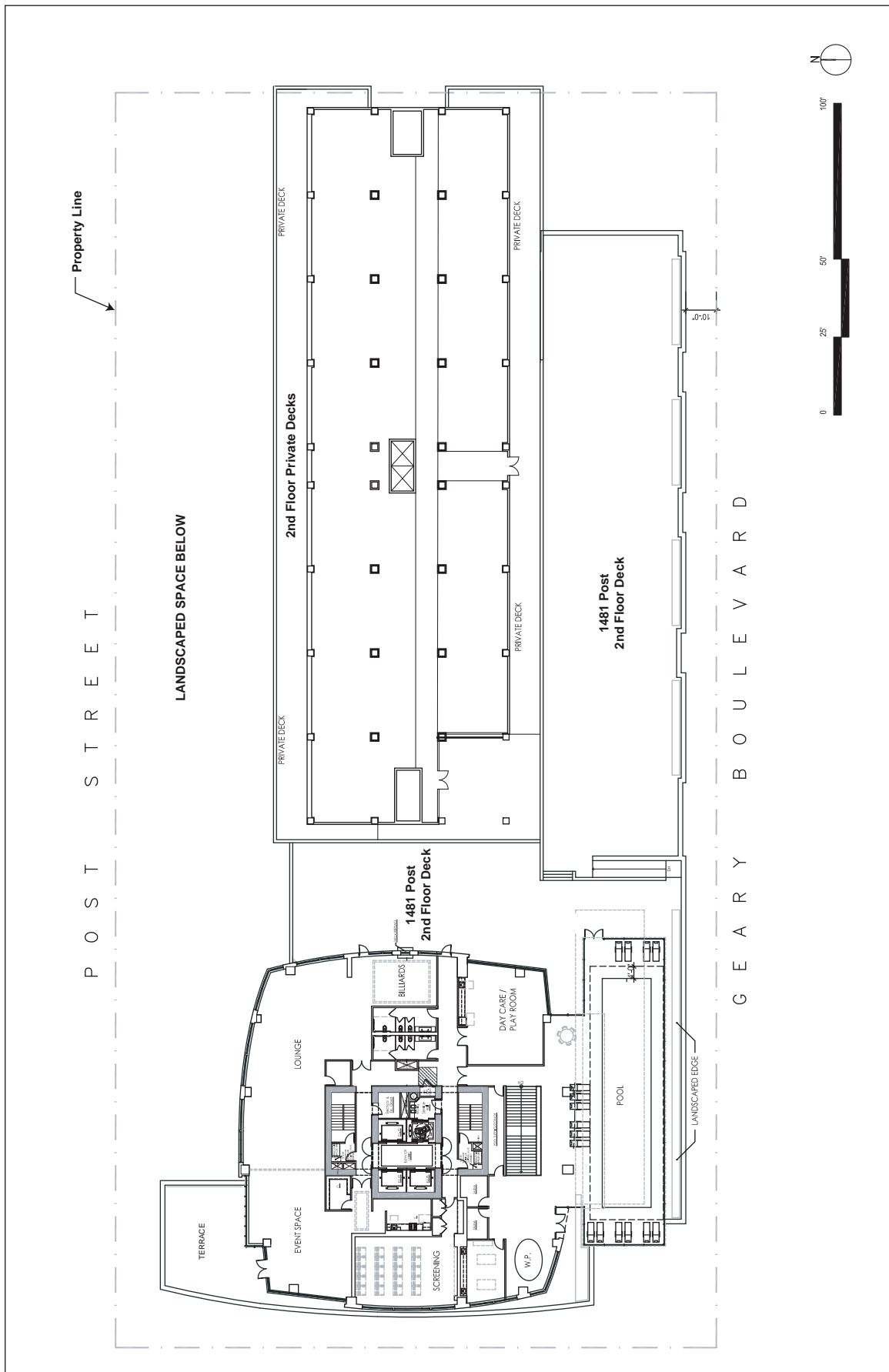
The new building at 1481 Post Street would include a 2,460-gsf retail space for a café along Post Street at the northwest corner of the project site. The main entrance to the proposed café would face Post Street.



SOURCES: SLCE Architects / MWA Architects

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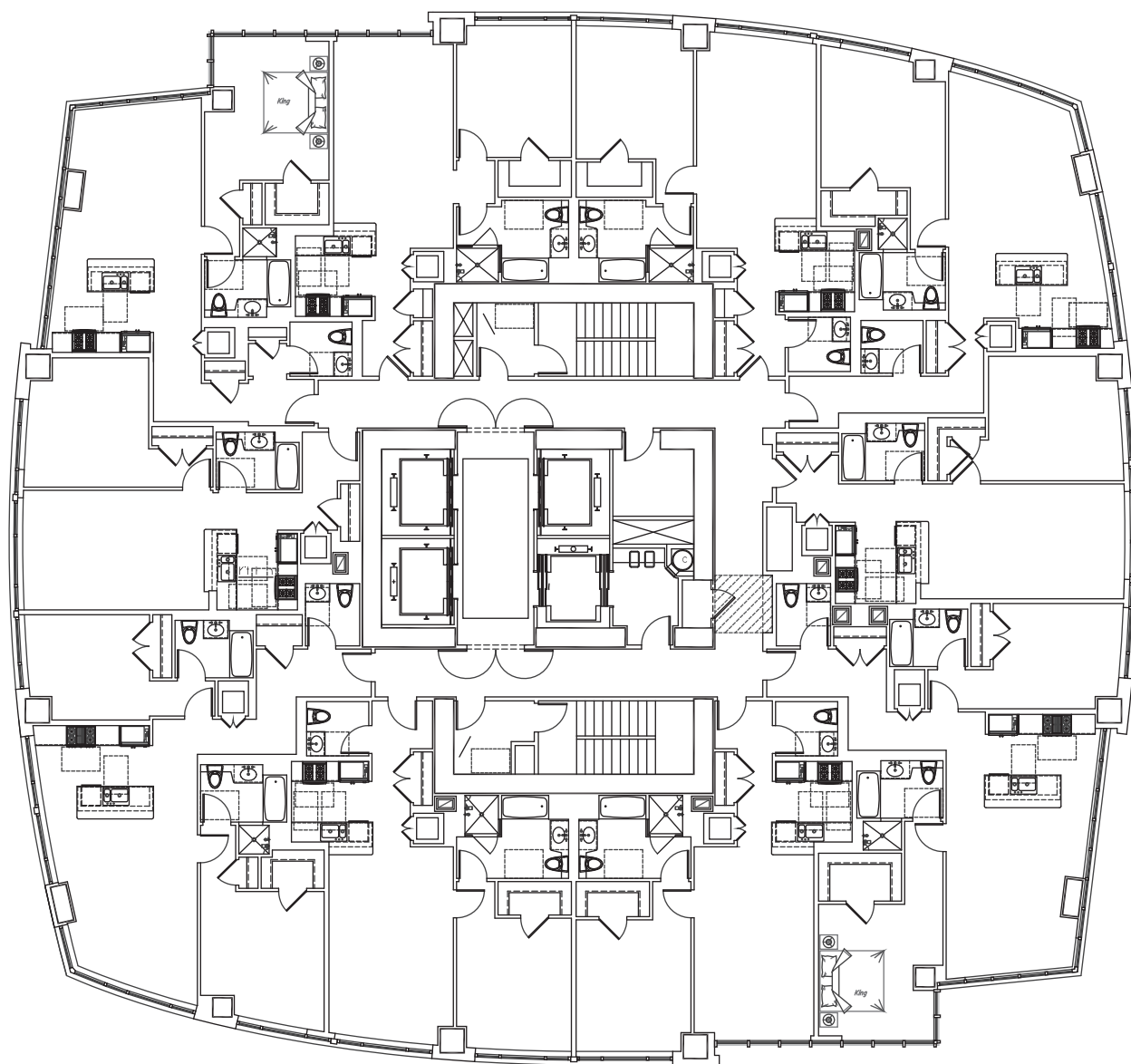


SOURCES: SLCE Architects / MWA Architects

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FIGURE 4: PROPOSED 2ND FLOOR PLAN

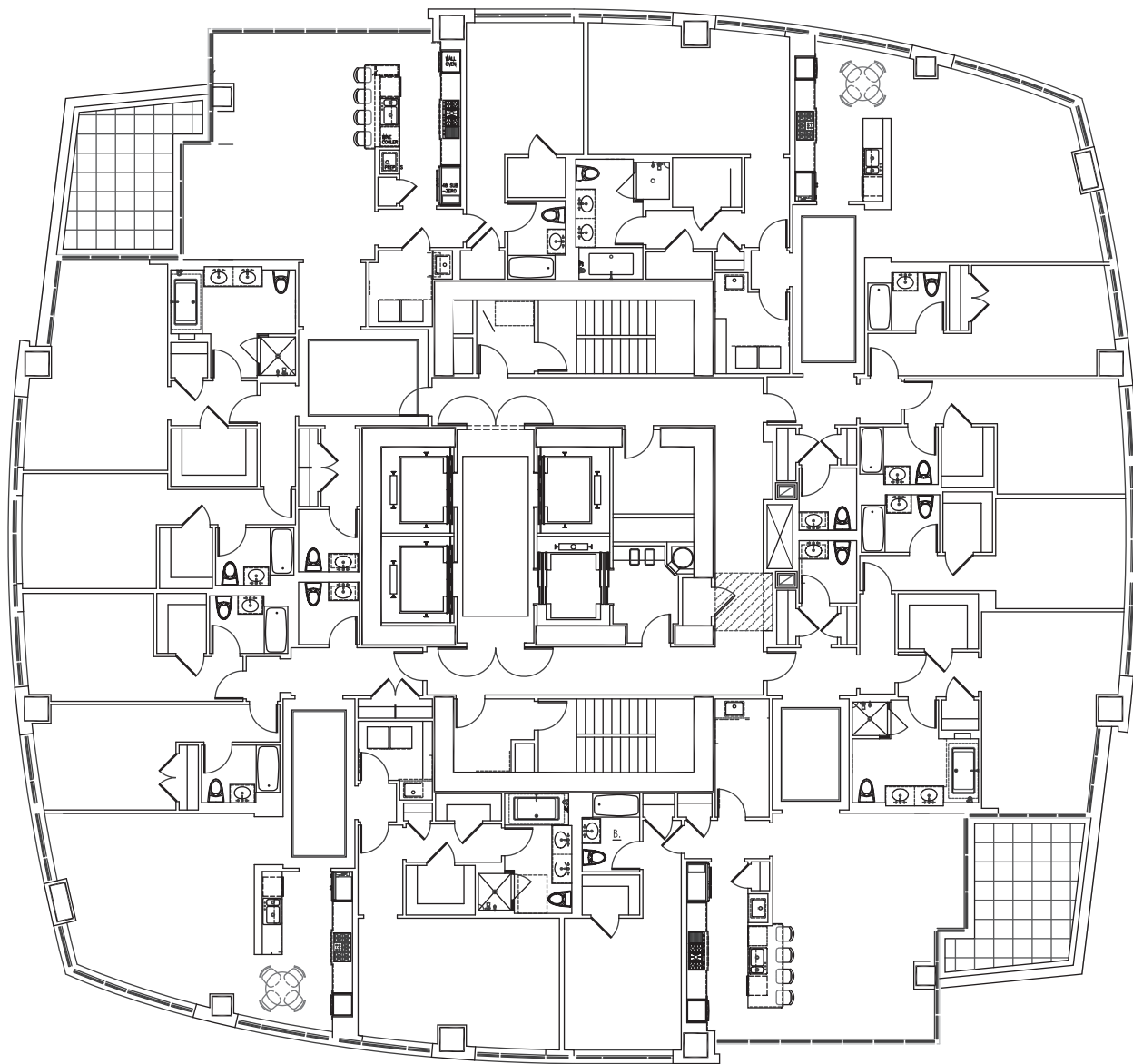


SOURCES: SLCE Architects / MWA Architects

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**FIGURE 5: PROPOSED REPRESENTATIVE 3RD FLOOR
THROUGH 29TH FLOOR TOWER PLAN**

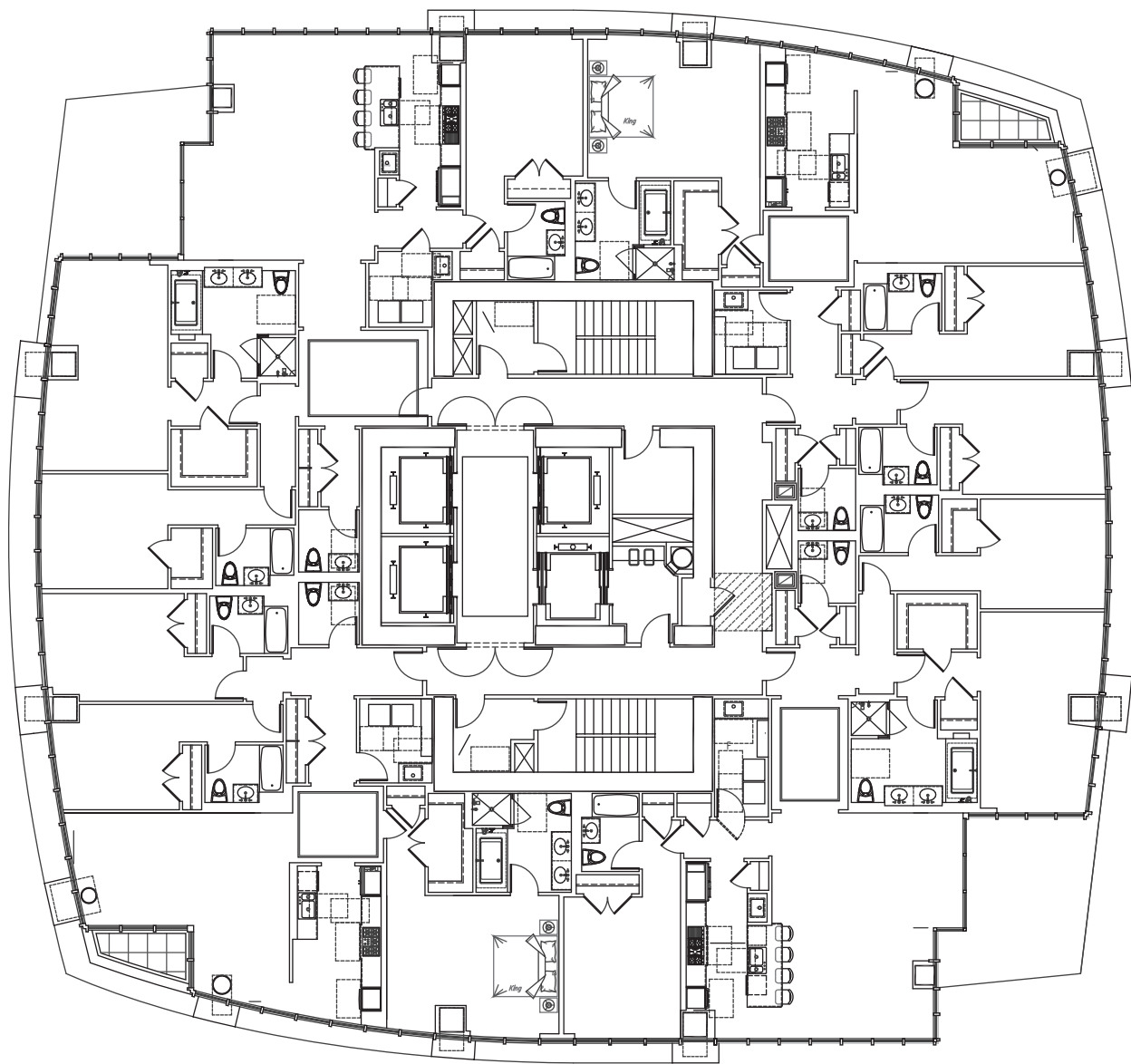


SOURCES: SLCE Architects / MWA Architects

1333 GOUGH STREET/1481 POST STREET

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**FIGURE 6: PROPOSED REPRESENTATIVE 30TH FLOOR
THROUGH 32ND FLOOR TOWER PLAN**

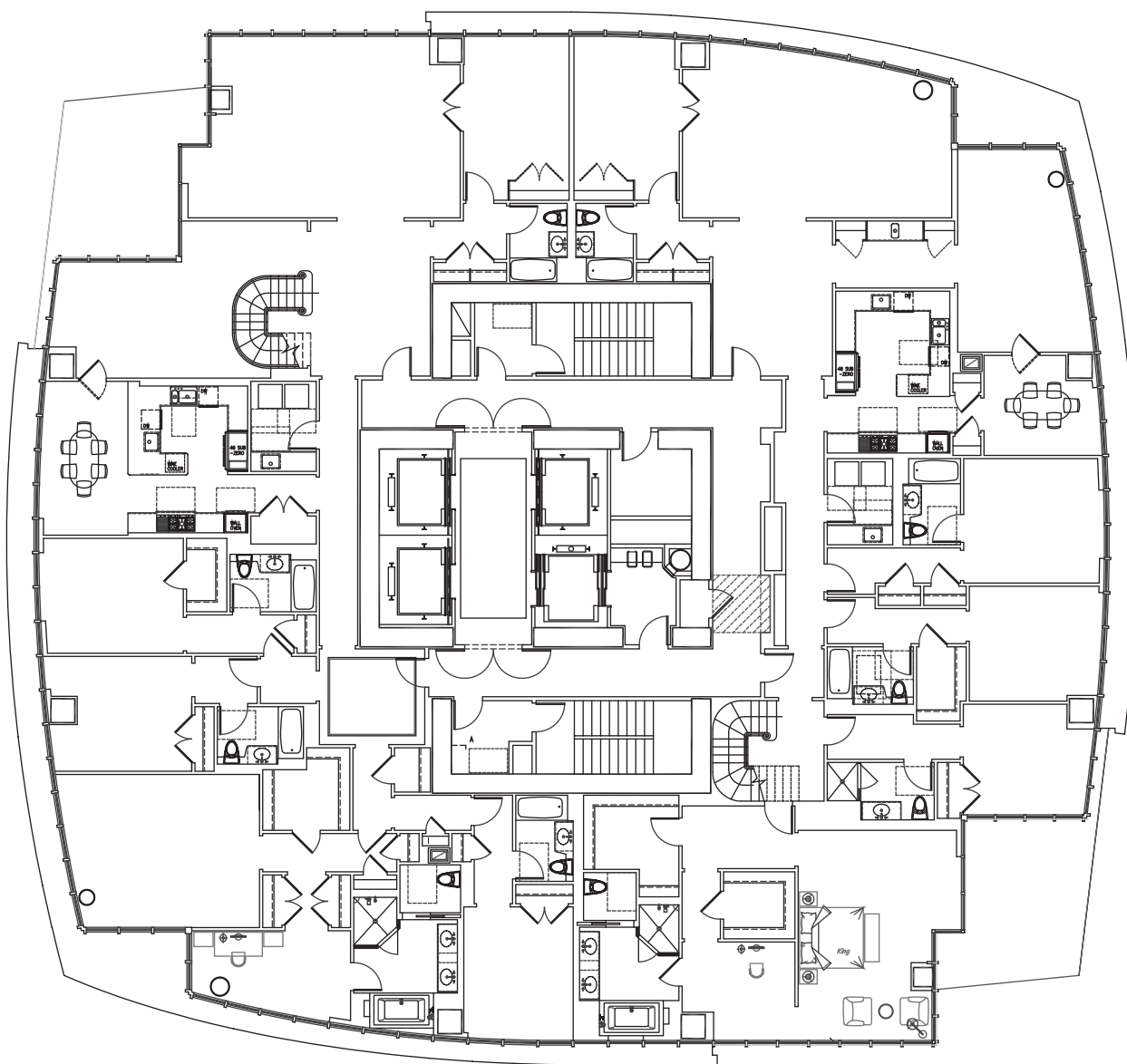


SOURCES: SLCE Architects / MWA Architects

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**FIGURE 7: PROPOSED REPRESENTATIVE 33RD FLOOR
THROUGH 35TH FLOOR TOWER PLAN**

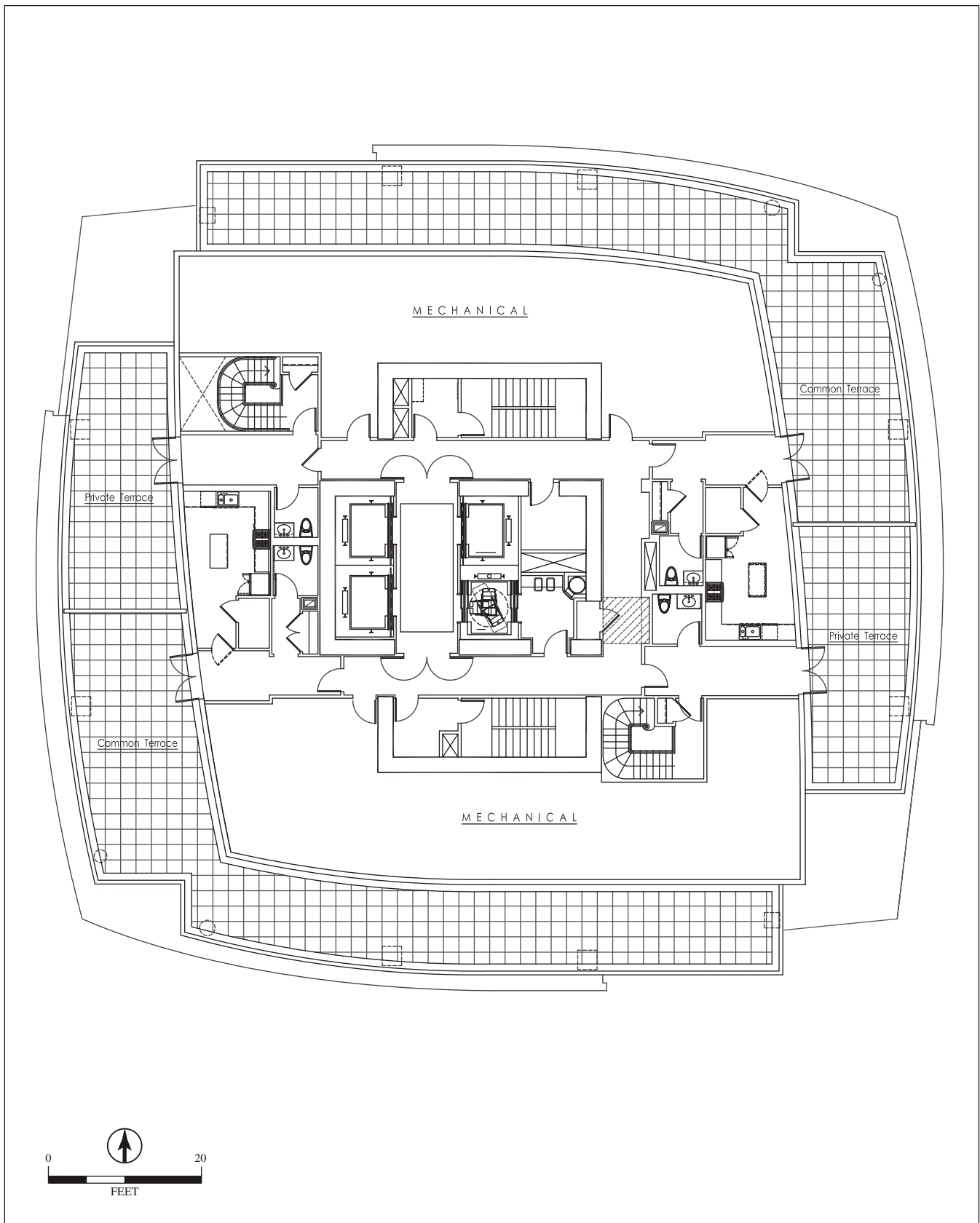


SOURCES: SLCE Architects / MWA Architects

1333 GOUGH STREET/1481 POST STREET

2005.0679E

**FIGURE 8: PROPOSED REPRESENTATIVE
36TH FLOOR TOWER PLAN**



SOURCES: SLCE Architects / MWA Architects

1333 GOUGH STREET/1481 POST STREET

2005.0679E

**FIGURE 9: PROPOSED MECHANICAL
AND PENTHOUSE PLAN**

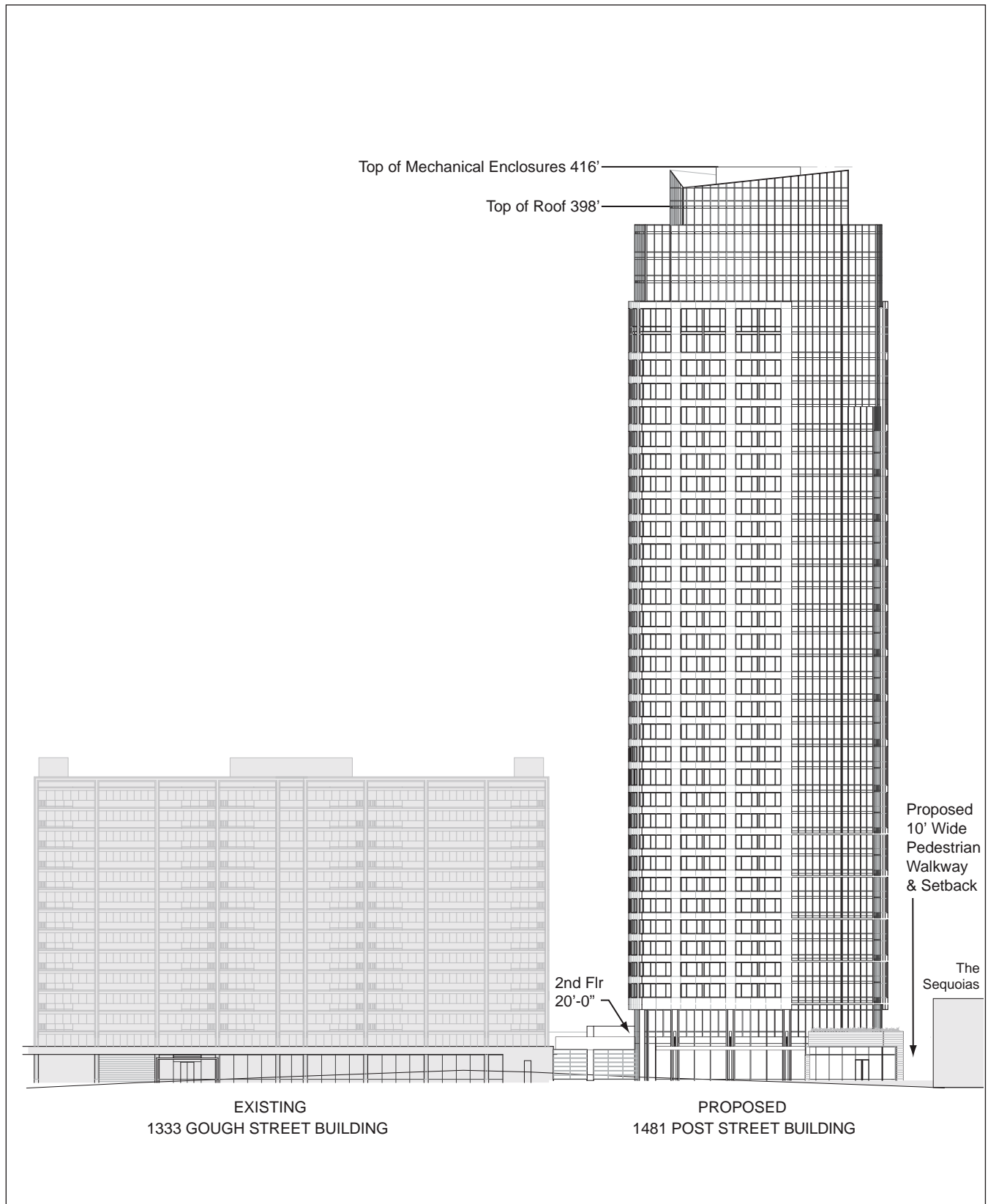
Proposed 1481 Post Street Building Form and Design

The proposed new 36-story 1481 Post Street building would consist of a ground-floor podium element, surmounted by a vertical tower element (398 feet tall, plus mechanical equipment, screening and architectural features to reach a total height of 416 feet). (See Figure 10: Proposed North (Post Street) Elevation; Figure 11: Proposed East and West Elevations; and Figure 12: Proposed South (Geary Boulevard) Elevation.) The 20-foot-tall ground floor would be set back about 47 feet from the Post Street sidewalk and about 10 feet from the Geary Boulevard sidewalk. The proposed café at the northwest corner of the project site would project northward toward Post Street, set back about 15 feet from the Post Street sidewalk.

Along its west façade, the ground-floor podium would bow outward in plan. The podium would be set back a minimum of 10 feet from the west property line shared with The Sequoias at the midpoint of the podium (separated by about 16 feet, 8 inches from the low-rise portion of the Sequoias building at that building's nearest point). The setback from the property line would gradually widen to the north and to the south along the arc of the podium façade to about 15 feet at the north and south ends of the podium. Within the west setback, a ground-level, publicly accessible pedestrian walkway would be constructed to provide a midblock passage between Post Street and Geary Boulevard. The pedestrian walkway would be gated at both ends and would be open to the public during daylight hours.

Along Geary Boulevard, the ground floor of the proposed 1481 Post Street building would include extensive glazing along its frontage, and would be separated from the sidewalk by a 10-foot-wide landscaped strip. The one-story street frontage of the proposed building's base along Geary Boulevard would extend eastward with the proposed covered and enclosed loading area and a proposed one-story pool addition further east along Geary Boulevard, forming a continuous one-story structure spanning the project site. A new fitness center entrance would be located along Geary Boulevard. The proposed pool addition frontage along Geary Boulevard would likewise include large glazed areas.

Above the podium, the proposed 1481 Post Street building tower shaft would be set back from Post Street by about 40 feet, from Geary Boulevard by about 46 feet, and from 1333 Gough Street on the project site by about 41 feet. The tower shaft would be set back by about 12 feet from the west property line shared with The Sequoias (separated by about 82 feet from the high-rise tower of The Sequoias). The proposed project's tower shaft would rise straight upward for most of its height. In plan, the building shaft would be nearly as wide as it is long (measuring about 110 feet along its north-south axis and about 118 feet along its east-west axis). The outer walls of the tower shaft would be bowed outward in a broad arc. At the northwest and southeast corners, the tower's volume would be sculpted to create vertical articulation. Additional upper-floor setbacks beginning at the 30th floor would provide further articulation at the building top. The proposed

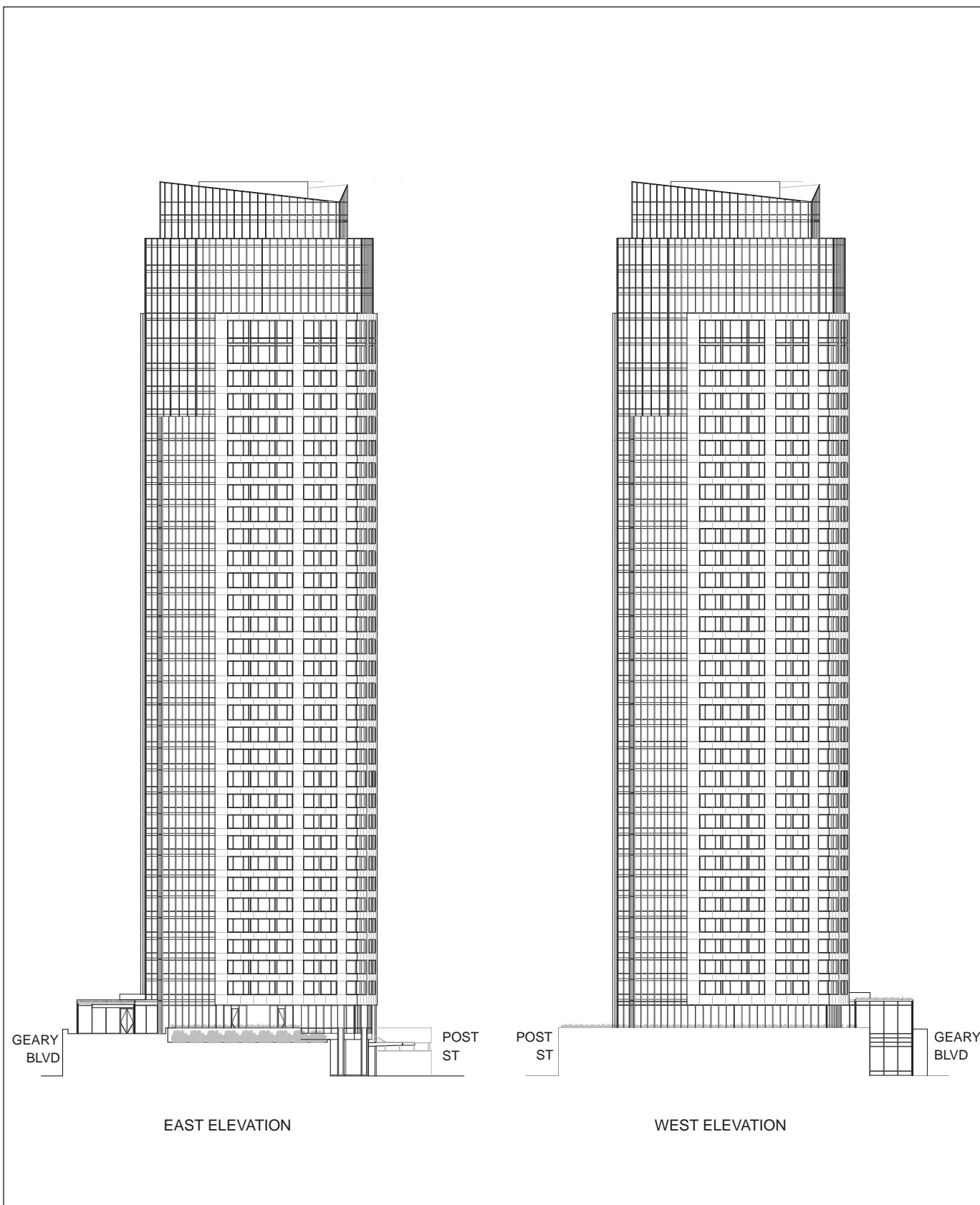


SOURCES: SLCE Architects / MWA Architects

1333 GOUGH STREET/1481 POST STREET

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FIGURE 10: PROPOSED NORTH (POST STREET) ELEVATION

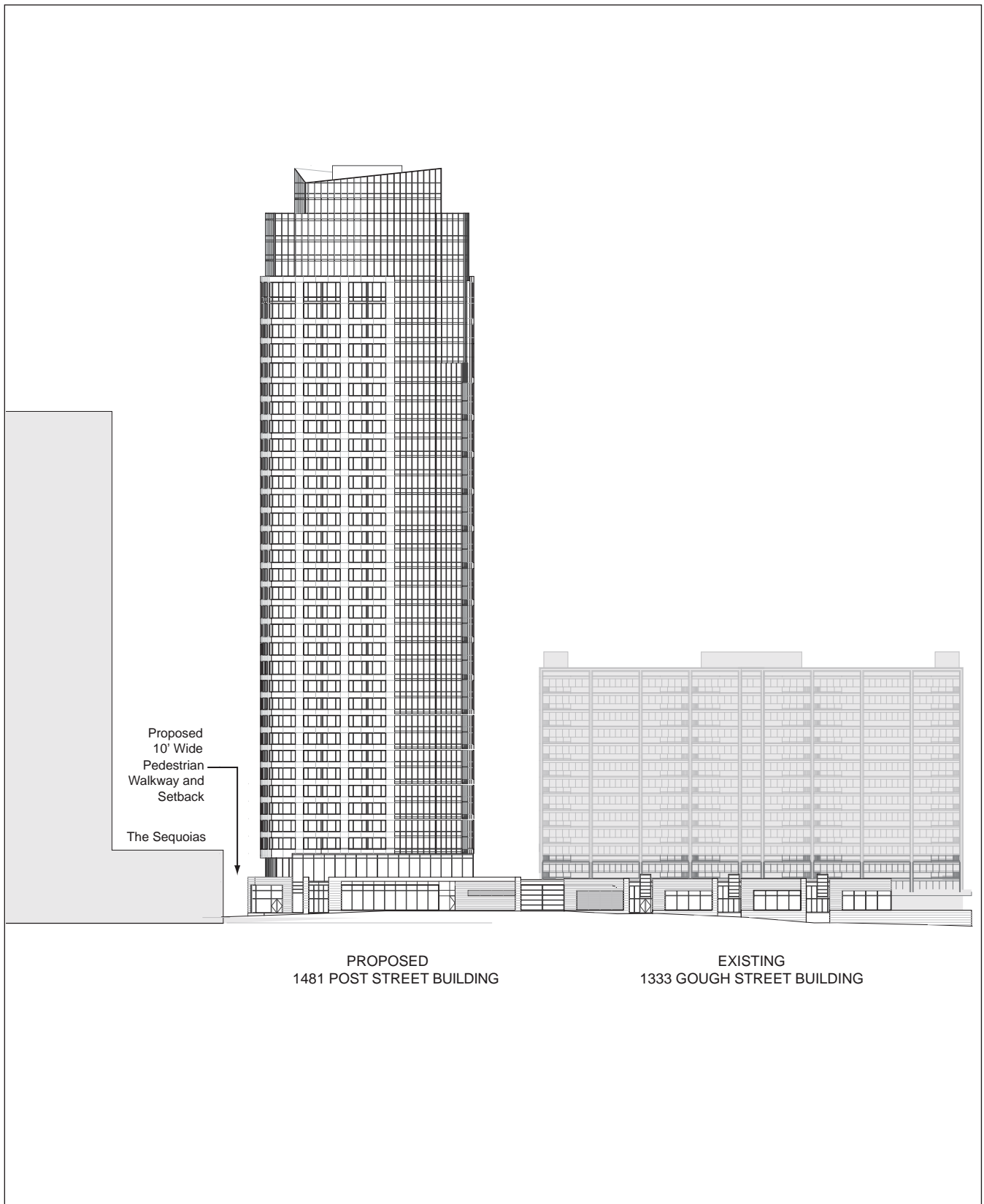


SOURCES: SLCE Architects / MWA Architects

1333 GOUGH STREET/1481 POST STREET

2005.0679E

FIGURE 11: PROPOSED EAST AND WEST ELEVATIONS



SOURCES: SLCE Architects / MWA Architects

1333 GOUGH STREET/1481 POST STREET

2005.0679E

FIGURE 12: PROPOSED SOUTH (GEARY BOULEVARD) ELEVATION

1481 Post Street building would be contemporary in architectural vocabulary and would include contrasting cladding systems, glazed curtain walls with metal mullions, and masonry-clad piers and spandrels.

Proposed Modifications to 1333 Gough Street

Lobby

The existing lobby entrance of 1333 Gough Street would be relocated from its current east-facing location under the elevated east end of the building slab to the north side of the building to face Post Street. The existing lobby interior would also be reconfigured and remodeled. Primary pedestrian access to the reconfigured 1333 Gough Street lobby would be from Post Street. Pedestrian access to the fitness center for non-resident members would be from Geary Boulevard.

Fitness Center Renovation and Pool Addition

The proposed project includes renovation of the existing fitness center at the ground floor of 1333 Gough Street and reconfiguration of the facility to integrate a new indoor swimming pool addition. The proposed new ground-floor pool addition (8,000 gsf) would be constructed immediately to the south of 1333 Gough Street. The proposed pool addition would front along Geary Boulevard and would be set back 10 feet from the Geary Boulevard sidewalk (see Figure 3 on p. 8). Member residents of 1333 Gough Street could continue to access the fitness center through the reconfigured building lobby. Non-resident members and visitors would enter through a doorway to the pool addition along Geary Boulevard. The proposed pool addition would open onto a proposed grade-level, fenced garden open space at the southeast corner of the project site. This open space would be an amenity for the use of fitness center members. The existing tennis courts that would be demolished under the proposed project would not be replaced.

The fitness center would continue to be used by member residents of 1333 Gough Street and would be open to the public for membership. The project sponsor anticipates that club members would continue to consist primarily of neighborhood residents. The project sponsor estimates that the total membership of the fitness center would increase from about 200 existing members to about 400 members after completion of the proposed fitness center upgrades. As of 2013, the fitness center is staffed with about 11 employees, and the project sponsor does not anticipate the

proposed fitness center upgrades would require changes to its staffing levels.² There are also a number of independent contractors who teach classes or provide personal training on a limited basis, and whose composition and hours may change with increased membership.

1333 Gough Street Residential Open Space

Private open space for the 1333 Gough Street building would continue to total 18,740 sq. ft., including the existing balconies for 144 units on the 3rd through 14th floors (totaling about 13,824 sq. ft.). The existing private open space decks for each of the 13 2nd floor units would be temporarily demolished with demolition of the existing parking structure on which they sit. The private 2nd floor decks would be reconstructed (totaling about 4,916 sq. ft.) under the proposed project. The remaining 12 units, one on each of the 3rd through 14th floors, would be served by the proposed new common open space in the form of a fenced outdoor garden (576 sq. ft.) at ground level along Gough Street near the southeast corner of the project site adjacent to, and north of, the proposed fitness center garden (see Figure 3 on p. 8). The 1333 Gough Street garden would be accessible through the lobby of 1333 Gough Street.

Ground Floor, North Windows

A band of new windows would be added to the north façade of the building's ground floor, which would be newly exposed by the proposed demolition of the existing parking structure to the north.

Proposed Vehicular Access, Parking, Loading, and Bicycle Parking

Vehicular Access

Passenger vehicle access to the 1481 Post Street building (western) portion of the project site would be from a proposed 20-foot-wide, one-way curb cut entrance along Post Street near the northwest corner of the site. Vehicles could proceed to the passenger drop-off at the proposed 1481 Post Street building's lobby entrance or down a two-way ramp to the parking garage below. Vehicles would exit the site through a proposed 24-foot-wide, one-way curb cut exit along Post Street located about 58 feet to the east of the entrance curb cut.

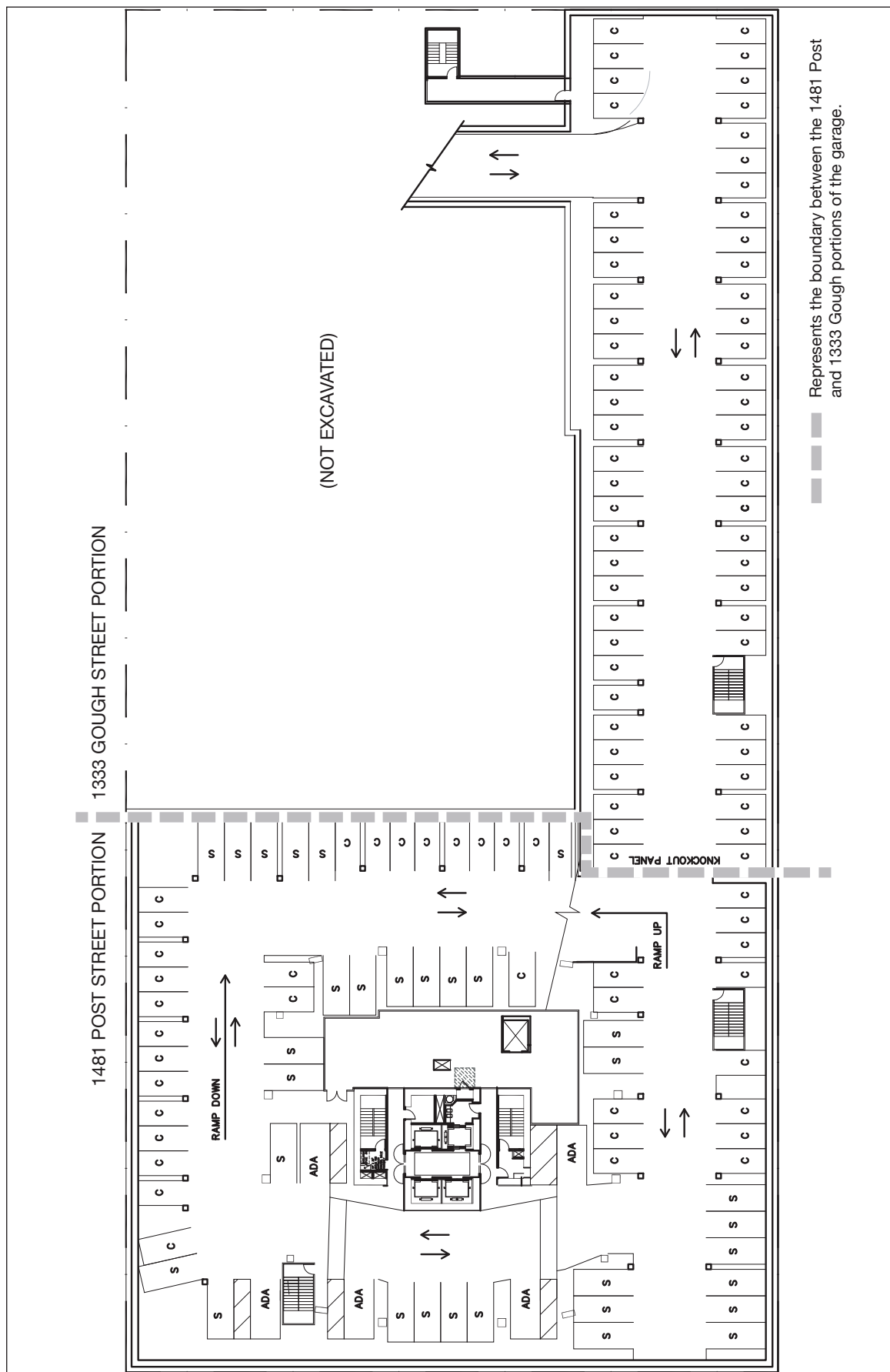
² According to the project sponsor, operation of the fitness center requires a fixed level of employees on payroll that is independent of the number of members (e.g., reception desk, operations manager, and fitness director). The existing fitness center facility is underutilized, particularly since the permanent closure of the pool in 2010. The current level of employees would support the anticipated increase in membership after the proposed facility upgrades are completed. Additionally, independent contractor tennis instructors would no longer be needed with the elimination of the tennis courts, thereby offsetting the anticipated need for new independent contractor instructors and trainers to serve the anticipated growth in membership. Turnstone Consulting, Memorandum: 2/19/2013 Communication with Eric Grossberg, Managing Director, ADCO, February 19, 2013. This document is available for review in Case File No. 2005.0679E at the San Francisco Planning Department, 1650 Mission Street, Suite 400.

Passenger vehicle access to the 1333 Gough Street (eastern) portion of the project site would be from the northeast corner of the project site from a two-way, 24-foot-wide curb cut entrance/exit along Gough Street (reduced from the existing 27-foot-wide curb cut at this location), as well as the proposed new two-way, 24-foot-wide curb cut entrance/exit along Post Street. From these entrances, vehicles could proceed to a passenger drop-off area at the building's new Post Street lobby entrance or down a two-way ramp to the proposed parking garage below. The two existing curb cuts at the southeast corner of the project site (28 feet wide along Gough Street and 20 feet wide along Geary Boulevard) would be eliminated.

Proposed Parking Garage

The proposed subsurface parking garage (about 180,000 gsf in total) would consist of two separate portions: one for the residents of 1333 Gough Street, and the other for the residents of the proposed 1481 Post Street building. It would provide a total of 442 independently accessible parking spaces. (See Figure 13: Proposed Basement Level 1 Parking Plan; Figure 14: Proposed Basement Level 2 Parking Plan; and Figure 15: Proposed Basement Levels 3 and 4 Parking Plan. The boundary between the 1333 Gough Street portion of the garage and the 1481 Post Street building portion of the garage is shown in these figures as a bold, dashed, gray line.) Access between the proposed 1481 Post Street portion of the garage and the 1333 Gough Street portion would be limited, and the two areas of the garage would be separated by gates and barriers.

The two-level 1333 Gough Street portion of the garage would generally occupy the eastern portion of the project site (except at basement level 1, where parking for 1333 Gough Street would occupy the southwestern portion of the project site), and would consist of 169 residential spaces and 7 visitor spaces to replace the existing parking spaces that would be demolished. The 1333 Gough Street portion of the proposed parking garage would also include 4 carshare spaces for use by the public. The parking spaces for 1333 Gough Street and the carshare spaces would be accessed from the existing two-way curb cut entrance/exit along Gough Street, as well as the proposed two-way curb cut entrance/exit along Post Street. The existing driveway running north-south beneath the raised east end of the 1333 Gough Street building (now used as a passenger drop-off and porte-cochere) would be eliminated. The area would be excavated to become a two-way ramp leading down to basement level 1. At basement level 1, the seven visitor spaces and the four carshare spaces would be located at the southeast corner of the parking garage. This area would be made accessible to visitors and carshare users. Residents of 1333 Gough Street would continue through a gate to access parking spaces for 1333 Gough Street. Vehicles could proceed down to basement level 2 with a series of right turns. Vehicles would exit the 1333 Gough Street portion of the garage by driving up the same ramp to exit the site onto Post Street or Gough Street.

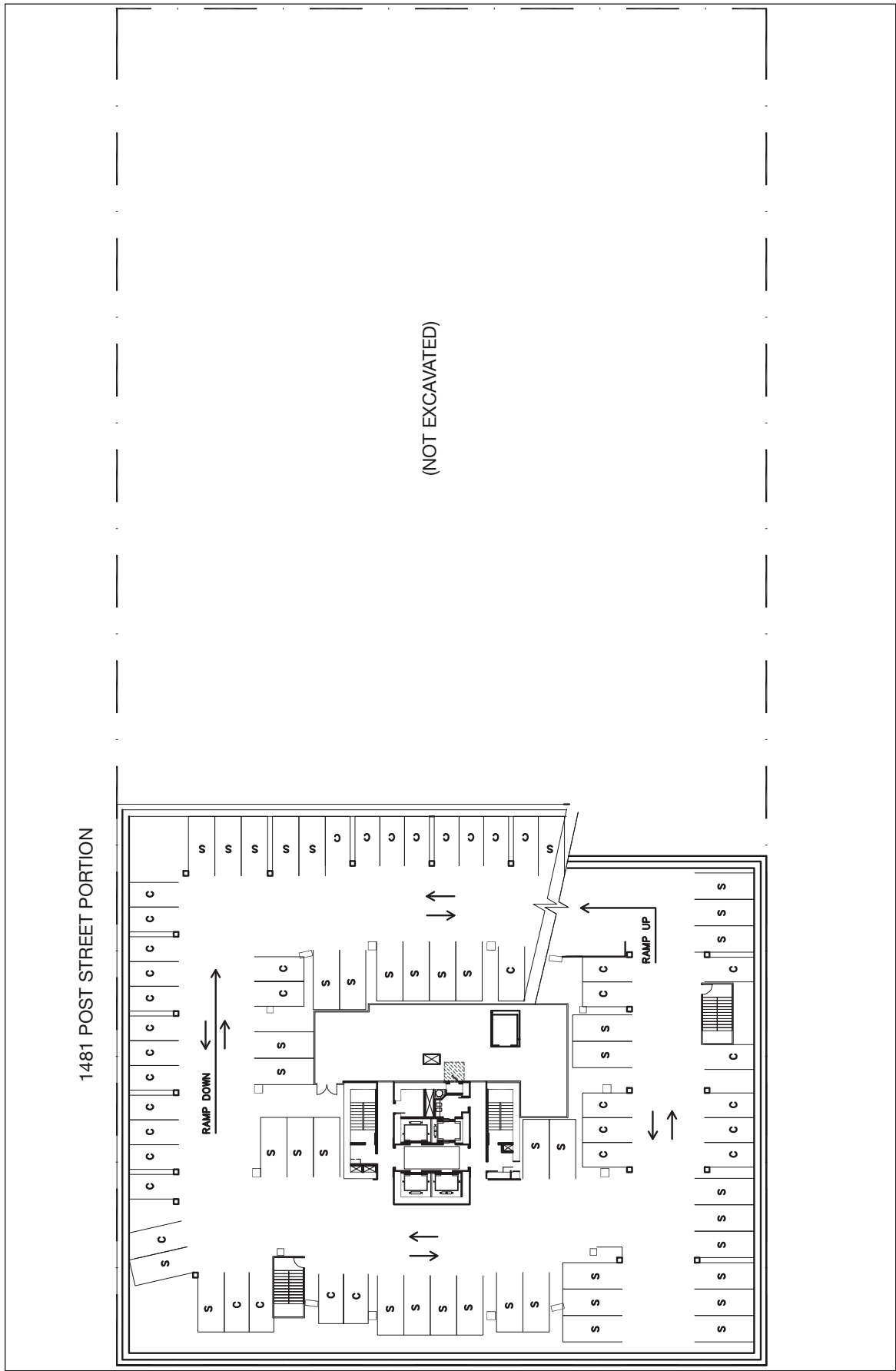


SOURCES: SLCE Architects / MWA Architects

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2005.0679E

FIGURE 14: PROPOSED BASEMENT LEVEL 2 PARKING PLAN



SOURCES: SLCE Architects / MWA Architects

FIGURE 15: PROPOSED BASEMENT LEVELS 3 AND 4 PARKING PLAN

The four-level 1481 Post Street building portion of the garage would occupy the western portion of the garage in four levels, and would provide 262 residential spaces. It would be accessed from the proposed one-way curb cut entrance along Post Street. Vehicles would proceed southward down a two-way ramp to the parking garage below. At basement level 1, gates would prevent residents of 1333 Gough Street from entering the proposed 1481 Post Street building portion of the garage. However, residents of the proposed 1481 Post Street building would be allowed limited access through gates to use the parking circulation aisle at the southwest portion of basement level 1 (with parking reserved for the residents of 1333 Gough Street) to allow residents of the proposed 1481 Post Street building to access the lower parking spaces allocated to 1481 Post Street. Vehicles would exit the garage by driving up the same ramp to exit the site from the proposed one-way curb cut exit onto Post Street.

As under existing conditions, the proposed project would not provide parking for the existing fitness center (as reconfigured under the proposed project and described above). Likewise, the proposed project would not provide parking for the new café use.

Loading

The proposed project would include two freight loading spaces (with dimensions of 12 feet wide, 35 feet long, and 14-foot vertical clearance) that would be located off of Geary Boulevard between the proposed 1481 Post Street building and the proposed 1333 Gough Street pool addition. (See Figure 3 on p. 8.) Delivery and service vehicles would enter the project site from a proposed 37-foot-wide, one-way curb cut entrance along Geary Boulevard and back into one of the loading spaces that flank the loading area entrance (covered by deck above). Vehicles would exit the loading area by proceeding northward through the project site on an interior driveway between the proposed 1481 Post Street building and 1333 Gough Street to exit onto Post Street from the proposed one-way curb cut exit. The freight loading area would serve both the existing and proposed buildings.

Bicycle Parking

At least 78 Class 1 bicycle parking spaces³ would be provided for residents of the proposed 1481 Post Street building within the portion of the proposed subsurface parking structure allocated to serve the proposed 1481 Post Street building at basement level 1 (see Figure 13 on p. 22).

³ Class 1 Bicycle Parking Spaces are defined in Planning Code Section 155.1(a) as “Facilities which protect the entire bicycle, its components and accessories against theft and inclement weather, including wind-driven rain.”

Project Variant

An optional scheme for vehicular access to the 1481 Post Street portion of the project site is under consideration. (See Figure 16: Curb Cut Project Variant.) Under this variant to the proposed project (the variant), vehicles would enter and exit the 1481 Post Street portion of the project site through a single, two-way, 30-foot-wide curb cut entrance along Post Street as opposed to three driveways along the site's Post Street frontage proposed by the project. (See Figure 3 on p. 8.) The curb cut under this variant would be aligned with the proposed parking garage ramp. In all other respects, this variant would be substantially the same as the proposed project.

Project Construction

Foundation and Excavation

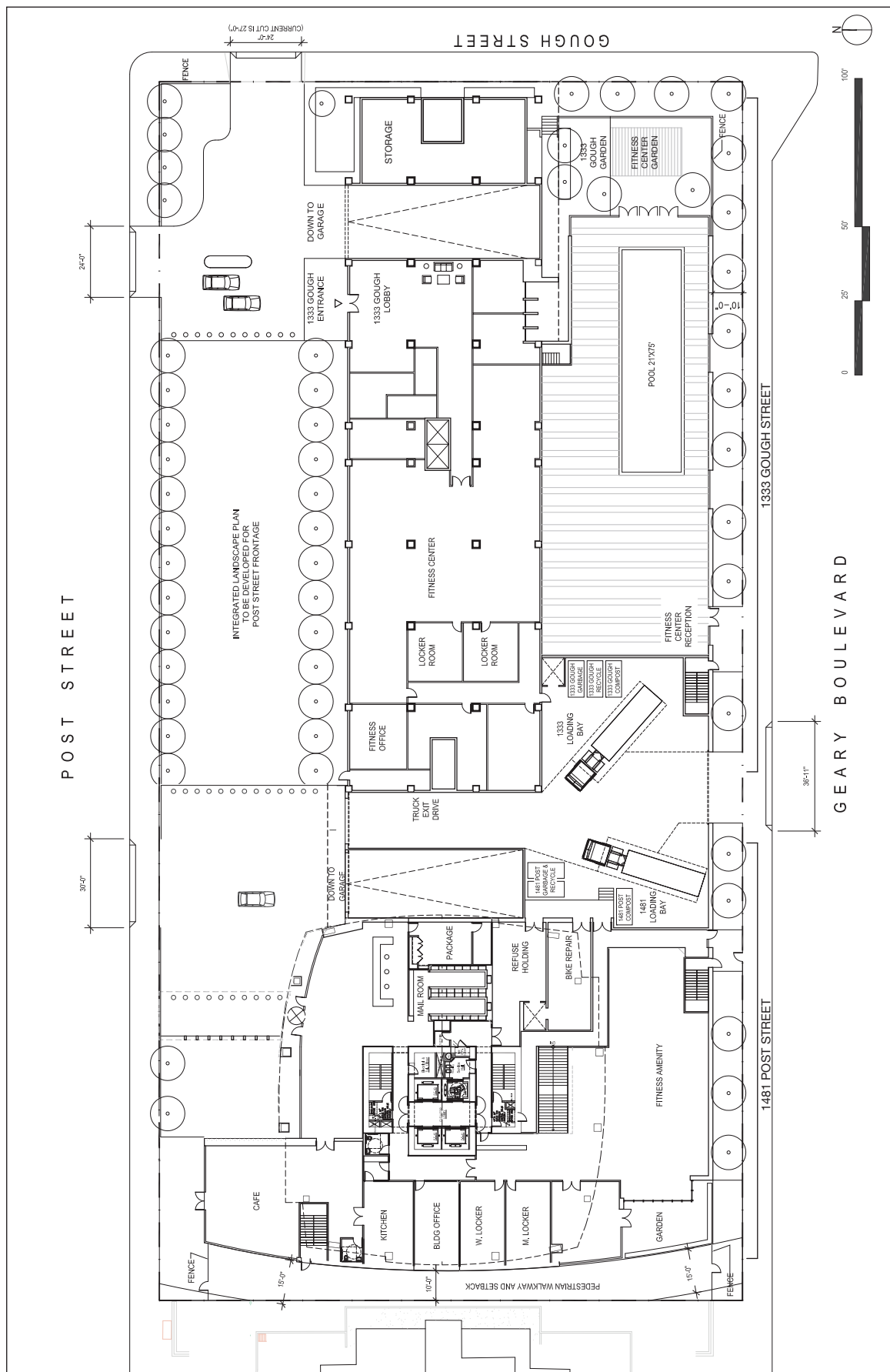
The proposed 1481 Post Street building would have a mat foundation under its core that would extend to perimeter columns. This mat foundation would extend approximately 7 feet below the lowest parking slab elevation. The proposed construction to the south of 1333 Gough Street would also have a mat foundation. No pile driving is anticipated. The construction below grade would include reinforced concrete walls. The proposed project would have an estimated maximum depth of excavation for the basement garage levels and mat foundation of as much as 45 feet below the ground surface at the western portion of the project site. Approximately 83,000 cubic yards of excavated soil would need to be removed from the project site.

Construction Phasing and Duration

Project construction would take about 27 months. Project construction would take place in overlapping phases. Demolition would take about 1.75 months. Excavation and shoring would take about 2.5 months. Foundation work and below grade construction would take about 4.5 months. Base building construction would take about 11 months. Exterior finishing would take about 4 months. Interior finishing would take about 12.5 months.

Temporary Parking During Construction

During construction of the proposed 1481 Post Street building, the areas to the north and south of 1333 Gough Street along Post Street and Geary Boulevard (newly cleared by demolition of the existing parking structure) would be modified to provide temporary parking for the existing residents. These temporary parking areas would be equipped with temporary double stacker units. All of the temporary parking would be attendant parking.



SOURCES: SLICE Architects / MWA Architects

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FIGURE 16: CURB CUT PROJECT VARIANT

At the conclusion of the construction of the 1481 Post Street building, the stacker units would be removed and the parking for residents of 1333 Gough Street would be moved to temporary spaces within the proposed new garage beneath the 1481 Post Street building. The area on the south side of 1333 Gough Street would then be excavated to provide for the permanent three-level parking garage facility that would accommodate parking for 1333 Gough Street.

Required Approvals

The project requires the following approvals, which may be reviewed in conjunction with the project's requisite environmental review, but may not be granted until such required environmental review is completed.

Planning Commission

- Recommendation of a Zoning Map amendment to reclassify the existing 240-E height and bulk limit for the project site, shown on Zoning Map Sheet HT02, to a 410-G height and bulk limit.
- Recommendation of a *General Plan* amendment to revise the 240-foot height limit and the bulk controls for the project site, shown on Map 4: Urban Design Guidelines for Height of Buildings, and Map 5: Urban Design Guidelines for Bulk of Buildings, in the Urban Design Element of the *General Plan*.
- Adoption of a *General Plan* referral regarding project consistency with the *General Plan* and the Priority Policies (pursuant to Charter Section 4.105 and Administrative Code Section 2A.53).
- Determination under Planning Code Section 295 that the net new shadow being cast on Cottage Row Mini-Park, Hamilton Recreation Center, Peace Plaza, and Raymond Kimbell Playground would not be adverse to the use of the parks.
- Approval of a Planned Unit Development (including amendment to the existing 1963 PUD, as necessary). The project sponsor requests a PUD to allow exceptions to provisions of the Planning Code governing rear yard depth (Planning Code Section 134), dwelling unit exposure (Planning Code Section 140), and residential density (Planning Code Section 209.1(l)).

Planning Commission and Recreation and Park Commission

- Determination under Planning Code Section 295 that the net new shadow being cast on Cottage Row Mini-Park, Hamilton Recreation Center, Peace Plaza, and Raymond Kimbell Playground would not be adverse to the use of the parks.

Board of Supervisors

- Adoption of a Zoning Map amendment to reclassify the existing 240-E height and bulk limit for the project site, shown on Zoning Map Sheet HT02, to a 410-G height and bulk limit.

- Adoption of a *General Plan* amendment to revise the 240-foot height limit and the bulk controls for the project site, shown on Map 4: Urban Design Guidelines for Height of Buildings, and Map 5: Urban Design Guidelines for Bulk of Buildings, in the Urban Design Element of the *General Plan*.

Other City Departments

- Recommendation of a determination under Planning Code Section 295 that the net new shadow being cast on Cottage Row Mini-Park, Hamilton Recreation Center, Peace Plaza, and Raymond Kimbell Playground would not be adverse to the use of the parks (Recreation and Park Commission).
- Approval of site permit (Planning Department and Department of Building Inspection).
- Approval of demolition, grading, and building permits (Planning Department and Department of Building Inspection).
- Approval of project compliance with the Stormwater Control Guidelines (Department of Public Works).
- Approval of a stormwater control plan (San Francisco Public Utilities Commission).

B. PROJECT SETTING

This discussion of project setting is presented in the Initial Study to orient the reader to the surrounding context of the project site. The forthcoming Environmental Impact Report (EIR) for the proposed project will include a Land Use section that will describe surrounding land uses in the vicinity of the project site in greater detail, and will include a description of surrounding development patterns (land uses, block size and configuration, building heights, building setbacks, development intensity, separation of towers) to analyze the proposed project's potential land use effects.

The project site is located in the Cathedral Hill area, the Western Addition, and at the eastern edge of the Japantown neighborhood. The project block is in a RM-4 (Residential, Mixed, High Density) District and 240-E Height and Bulk District.

Existing Surrounding Land Uses⁴

High-rise residential buildings and churches are located directly east of the project site, and lower residential buildings are to the north across Post Street. A high-rise residential building for seniors is to the west, and Saint Mary's Cathedral is located south of the project site across Geary Boulevard. The commercial corridor along Van Ness Avenue is two blocks to the east. Major uses along Van Ness Avenue include the One Daniel Burnham Court building (between Sutter

⁴ This Initial Study describes building heights as a measurement in feet above ground surface and/or as a number of building stories. For the purposes of this Initial Study, one residential story is equivalent to about 10-12 feet, although ground-floor stories are often higher (up to 15 feet). The term "low-rise" refers to buildings that are 1 to 3 stories and up to 40 feet tall. The term "mid-rise" refers to buildings that are 4 to 8 stories and up to 85 feet tall. The term "high-rise" refers to buildings that are above 85 feet tall.

Street and Post Street), which has 13- and 18-story towers with residences and ground-floor commercial uses. Major uses west of the project site include the Japan Center, a five-acre commercial complex bounded by Post Street, Geary Boulevard, Laguna Street, and Fillmore Street that includes Peace Plaza, the Kintetsu and Miyako Malls, the Kinokuniya Building, the Sundance Kabuki theatre, and the Radisson Miyako Hotel. The project site is also within the former Western Addition Redevelopment Project Area A-1 (expired in May 2000), which covered the area delineated by Post, Franklin, Broderick, and Eddy Streets.

Uses on sites and blocks immediately adjacent to the project site are described in more detail below. (See Figure 17: Project Block Context Plan.)

To the North

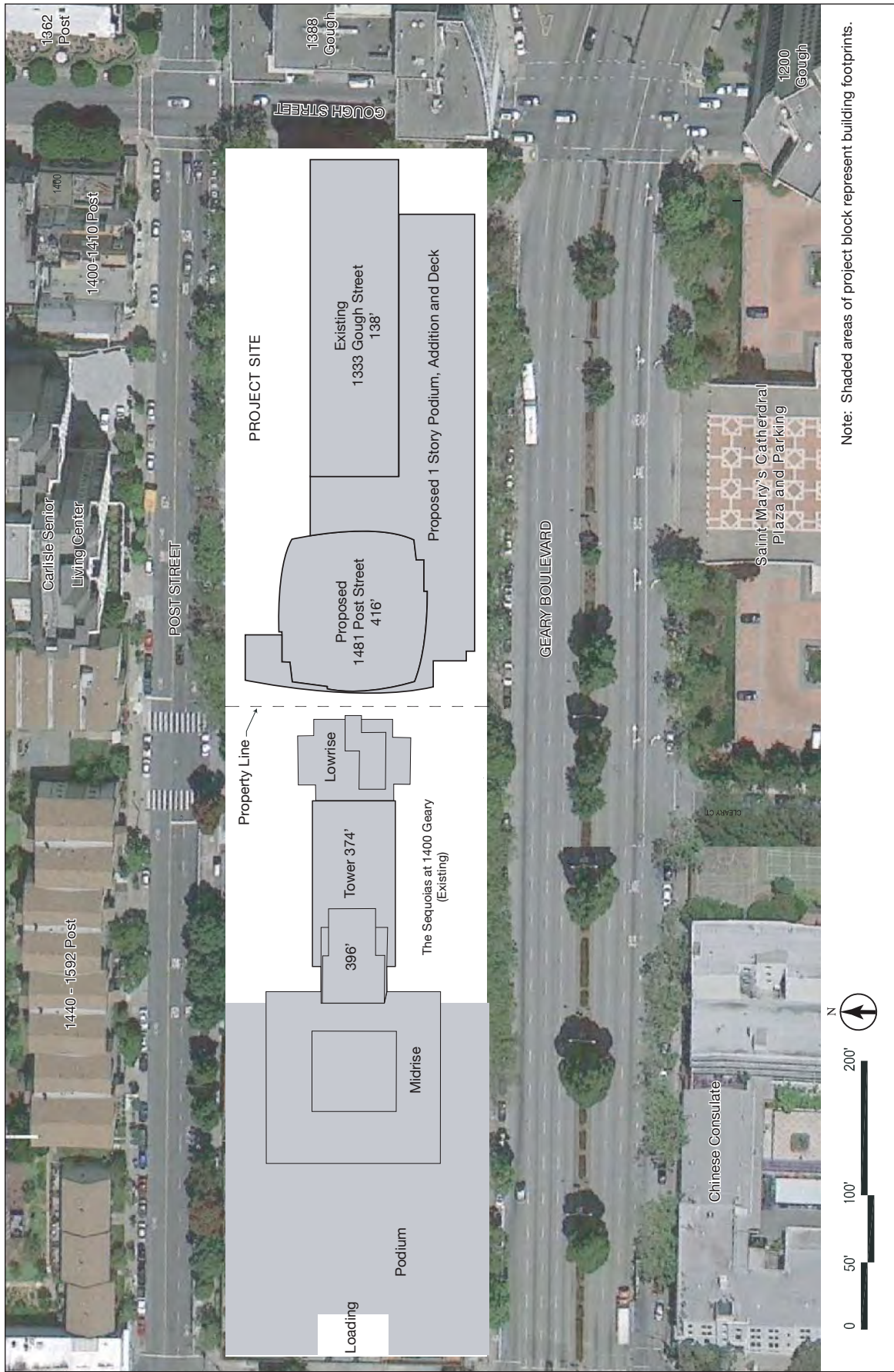
The uses to the north of the project site across Post Street are primarily residential (in a RM-4 District and a 50-X Height and Bulk District). Directly northwest of the project site there is a complex of two- and four-story residential buildings at 1490-1592 Post Street, and a 13-story residential building at 1619 Sutter Street, near the Octavia Street alignment.⁵ The uses across Post Street and directly north of the project site include the 12-story Carlisle Senior Living Center at 1450 Post Street, and four two- and three-story Victorian buildings with residential uses at 1400, 1402, 1406-1408, and 1410 Post Street.

Northeast of the project site (in a Neighborhood Commercial (NC-3) District and a 80-A Height and Bulk District, and a 130-E Height and Bulk District further east), the Intercultural Institute of California-Korean Center operates out of a three-story building at the northeast corner of Post and Gough Streets at 1362 Post Street. To the east of the Korean Center is the Sutterfield, a 17-story tower over 5-story podium containing condominiums and ground-floor commercial uses at 1483 Sutter Street. The block also includes the Spanish Consulate at 1405 Sutter Street.

To the East

On the block immediately east of the project site (in a NC-3 District a 130-E Height and Bulk District), the Post International complex at 1388 Gough Street has three buildings: a 13-story residential tower at the corner of Gough Street and Geary Boulevard, a 4-story residential/commercial building at the corner of Gough and Post Streets, and an 8-story residential building on Gough Street at mid block. A five-story residential building is located

⁵ The City and County of San Francisco vacated Octavia Street between Assessor Block 697 and Block 688 as part of adopting and implementing the Western Addition A-1 Redevelopment Plan in the mid-1950s. In the project vicinity, Octavia Street is discontinuous from Sutter Street to Geary Boulevard. (See Figure 1 on p. 2.)



SOURCES: SLCE Architects / MWA Architects

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FIGURE 17: PROJECT BLOCK CONTEXT PLAN

north of Peter Yorke Way (which bisects the block diagonally) adjacent to the Post International development. The Archdiocese of San Francisco is headquartered in a four-story commercial building at One Peter Yorke Way. A large area in the northeastern portion of the block is reserved for surface parking. The Hamilton Square Baptist Church is at the northwest corner of Franklin Street and Geary Boulevard.

The block directly southeast of the project site (in a RM-4 District and a 240-E Height and Bulk District, and a 130 E Height and Bulk District further east) is bounded by Geary Boulevard and Franklin, Ellis, and Gough Streets; the northern part of the block is bisected by Starr King Way. Within that block, the Cathedral Hill Tower at 1200 Gough Street is a 27-story residential building with ground-floor commercial uses. The First Unitarian Universalist Church and Center and Montessori House of Children occupy the northeast part of the block. South of the Cathedral Hill Tower building is the Carillon Towers, an 18-story residential building at 1100 Gough Street. Saint Mark's Square, south of Starr King Way, is home to Saint Mark's Lutheran Church, the Urban Life Center, and The Martin Luther Tower, a 13-story residential building at the corner of Ellis and Franklin Streets. The block also includes the Sacred Heart Cathedral Preparatory School at 1055 Ellis Street.

To the South

The Cathedral of Saint Mary of Assumption (Saint Mary's Cathedral) is directly south of the project site across Geary Boulevard (in a RM-4 District and a 240-E Height and Bulk District). The visually prominent Modernist cathedral building is approximately 190 feet tall and is set back behind a plaza more than 200 feet from Geary Boulevard, a 156-foot-wide boulevard. West of the cathedral (southwest of the project site, in a RM-4 District and a RM-3 District further west, and in a 160-B Height and Bulk District), the Chinese Consulate occupies a complex of one- to three-story buildings that front Geary Boulevard and Laguna Street. The 66 Cleary Court Condominiums are in a 15-story residential building south of the consulate. One block further to the southwest is the Saint Francis Square Cooperative Apartments complex, which is comprised of three-story residential buildings along Geary Boulevard and Laguna Street.

To the West

Directly west of the project site about 6 feet, 8 inches west of the property line shared with the project site at its closest point is The Sequoias, a 25-story, up to 396-foot-tall building (in a RM-4 District and a 240-E Height and Bulk District). The Sequoias is a retirement community operated by the Northern California Presbyterian Homes and Services with assisted living and skilled nursing services offered on site.

C. COMPATIBILITY WITH EXISTING ZONING AND PLANS

	<i>Applicable</i>	<i>Not Applicable</i>
Discuss any variances, special authorizations, or changes proposed to the Planning Code or Zoning Map, if applicable.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Discuss any conflicts with any adopted plans and goals of the City or Region, if applicable.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>

This section discusses the compatibility of the proposed project with applicable zoning ordinance provisions, land use plans, and approvals or permits required from various federal, state, and local agencies necessary for the construction and operation of the proposed project.

San Francisco Planning Code and Zoning Maps

The San Francisco Planning Code (Planning Code), which incorporates by reference the City's Zoning Maps, governs permitted uses, densities, and the configuration of buildings within San Francisco. Permits to construct new buildings (or to alter or demolish existing ones) may not be issued unless the proposed project complies with the Planning Code or an exception or variance is granted pursuant to the provisions of the Planning Code.

Use Controls

As shown on Zoning Map Sheet ZN02, the project site is in an RM-4 (Residential, Mixed, High Density) District. As described in Planning Code Section 206.2, RM-4 Districts are devoted almost exclusively to apartment buildings of high density, usually with smaller units, close to downtown. Sections 209.1 through 209.9 regulate the types of land uses that are principally permitted, conditionally permitted, or not permitted in RM-4 Districts. The proposed project consists of the demolition of the existing three-level parking structure, a shuttered swimming pool building, and tennis courts, and the construction of a 36-story, 398-foot-tall tower containing 262 dwelling units, a café, a fitness center for residents, and a garage with parking spaces for residents of the new building, and replacement parking for the existing parking that would be removed.

In RM-4 Districts, residential uses not exceeding a density ratio of 1 unit for every 200 square feet of lot area are principally permitted, but a higher residential density ratio is allowed with approval of a Planned Unit Development (PUD) by the Planning Commission pursuant to the procedures set forth in Section 304 of the Planning Code. Retail uses are permitted with approval of a PUD, subject to the conditions set forth in Section 304(d)(5). A PUD is a special type of conditional use authorization that allows the Planning Commission to modify or waive certain Planning Code requirements applicable to sites at least 0.5 acre in size. The Planning Department requires that all proposed projects located on sites at least 0.5 acres in size and seeking at least one modification or exception from the Planning Code be processed and approved with a PUD.

The project site, at 1.86 acres, qualifies for treatment under Planning Code Section 304. In order to approve a PUD, the Planning Commission must make the required conditional use findings set forth in Planning Code Section 303(c) in addition to the required PUD findings set forth in Planning Code Section 304(d). Implementation of the proposed project would not require the adoption of any legislative amendments to reclassify the current RM-4 zoning controls applicable at the project site.

Other Planning Code requirements that are applicable to the proposed project include, but are not limited to, the provisions of Section 132: Front Setbacks; Section 134: Rear Yards; Section 140: Dwelling Unit Exposure; Section 145: Street Frontages; Section 151: Required Off-Street Parking Spaces; Section 152: Required Off-Street Freight Loading Spaces; Section 155.5: Bicycle Parking Required for Residential Uses; Section 166: Car Sharing; Section 253: Proposed Buildings and Structures Exceeding a Height of 50 Feet in RM Districts; and Section 415: Affordable Housing.

Implementation of the proposed project would require the modification or waiver of the following Planning Code requirements through the approval of a PUD (a modification of the previously approved PUD⁶):

- **Rear Yard.** Per Planning Code Section 134, within RM-4 Districts, a rear yard must be provided that is equal to 25 percent of the lot, at the lowest level containing a dwelling unit and at each succeeding level. The project sponsor requests, by approval of a PUD, to provide a rear yard of approximately 10 feet in depth.
- **Exposure.** Per Planning Code Section 140, at least one room of each dwelling unit must face on to a public street, rear yard, or other open area that meets minimum requirements for area and horizontal dimensions. Section 140 specifies that an open area must have a minimum horizontal dimension of 25 feet at the lowest floor containing a dwelling unit and at the floor immediately above, with an increase of 5 feet in horizontal dimension for each subsequent floor above. The project, as proposed, does not satisfy these requirements and the project sponsor seeks modification to these requirements through a PUD.
- **Residential Density.** Per Planning Code Section 209.1(l), the RM-4 District generally permits a residential density of 1 dwelling unit per 200 square feet of lot area. A maximum residential density equal to one residential unit per 125 square feet of lot area (minus one unit) is permitted with approval of a PUD. The project proposes the construction of 262 units, which, including the 169 units that exist at 1333 Gough, results in a density of approximately 1 unit per 187 square feet of lot area, requiring approval of a PUD for residential density.

⁶ Planning Commission Resolution No. 5635, adopted on February 7, 1963, authorized a PUD of six multi-story residential buildings with about 891 dwelling units and associated commercial uses. The PUD covered three areas, one of which included the project site and the adjacent lot to its west (now the site of The Sequoias). The existing 1333 Gough Street building was developed pursuant to the PUD. Planning Commission Resolution No. 5946, adopted on December 2, 1965, amended the 1963 PUD to allow the development of The Sequoias.

An analysis of the proposed project's compliance with the Planning Code will be provided in the EIR.

Height and Bulk Controls

As shown on Zoning Map Sheet HT02, the project site is in a 240-E Height and Bulk District. The 240-E designation means that the maximum building height is 240 feet. Bulk controls reduce the size of a building's floorplates as the building increases in height. Pursuant to Section 270(a), the bulk controls in the "E" Bulk District become effective above a building height of 65 feet. Above a building height of 65 feet, the plan dimensions are limited to a maximum horizontal dimension of 110 feet and a maximum diagonal dimension of 140 feet.

The proposed project would not comply with the height and bulk controls. At a height of 398 feet, the proposed 1481 Post Street tower would exceed the height limit of 240 feet. Above a height of 65 feet, the proposed tower would have an east-west horizontal dimension of 118 feet, exceeding the maximum horizontal dimension of 110 feet permitted in an "E" Bulk District. Above a height of 65 feet, the proposed project would comply with the maximum diagonal dimension of 140 feet permitted in an "E" Bulk District.

Implementation of the proposed project would require the adoption of legislative amendments to reclassify the existing height and bulk limit from 240-E to 410-G.

San Francisco General Plan

The *General Plan* is the embodiment of the City's vision for the future of San Francisco. It is comprised of a series of ten elements, each of which deals with a particular topic that applies citywide: Air Quality; Arts; Commerce and Industry; Community Facilities; Community Safety; Environmental Protection; Housing; Recreation and Open Space; Transportation; and Urban Design. The *General Plan* also includes area plans, each of which focuses on a particular area of the City. There is no adopted area plan that includes the project site; however, the project site is within the project area of a draft planning study entitled the *Japantown Cultural Heritage and Economic Sustainability Strategy* (JCHESS), as discussed in greater detail on pp. 37-38.

Development in San Francisco is subject to the *General Plan*, which provides general policies and objectives to guide land use decisions and contains some policies that relate to physical environmental issues. The Planning Department, the Zoning Administrator, the Planning Commission, the Board of Supervisors, and other City decision-makers will evaluate the proposed project for conformance with the objectives and policies of the *General Plan*, and will consider potential conflicts as part of the decision-making process. The consideration of *General Plan* objectives and policies is carried out independent of the environmental review process, as part of the decision to approve, modify, or disapprove a proposed project.

The *General Plan* contains many objectives and policies, and some of these objectives and policies conflict with each other. Achieving complete consistency with the *General Plan* is not always possible for a proposed project. Consistency with the *General Plan* is typically based on whether, on balance, a proposed project would be consistent with *General Plan* policies. The California Environmental Quality Act (CEQA) does not require an analysis of the proposed project in relation to all *General Plan* policies; the Initial Study checklist asks whether a proposed project would conflict with any plans or policies adopted to protect the environment.

Conflicts with plans, policies, or regulations do not, in and of themselves, indicate a significant environmental effect within the meaning of CEQA. However, such conflicts could result in physical environmental effects. In particular, the proposed project's conflict with the existing height and bulk limits for the project site and the need to amend the *General Plan* and Height and Bulk maps to facilitate or permit approval as proposed could result in physical environmental impacts related to the topics of Land Use, Aesthetics, and Wind and Shadow. To the extent that potentially significant physical environmental impacts may result from such conflicts, these impacts will be analyzed in the EIR. The consistency of the proposed project with plans, policies, and regulations that do not relate to physical environmental issues will be considered by City decision-makers when they determine whether to approve, modify, or disapprove the proposed project.

The 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 and established eight Priority Policies. These policies, and the sections of this Initial Study (or EIR) that address, or will address, environmental issues associated with these policies, are:

- (1) preservation and enhancement of neighborhood-serving retail uses and future opportunities for resident employment in and ownership of such businesses (to be analyzed in the Land Use and Land Use Planning section of the EIR);
- (2) conservation and protection of existing housing and neighborhood character to preserve the cultural and economic diversity of neighborhoods (Initial Study topic 3b, Population and Housing; as well as the Land Use and Land Use Planning section of the EIR);
- (3) preservation and enhancement of affordable housing (Initial Study topic 3b, Population and Housing);
- (4) discouragement of commuter automobiles that impede Muni transit service or that overburden streets or neighborhood parking (to be analyzed in the Transportation and Circulation section of the EIR);
- (5) protection of industrial and service land uses from commercial office development and enhancement of resident employment and business ownership (not directly related to the proposed project);
- (6) maximization of earthquake preparedness (Initial Study topics 14a, 14c, and 14d, Geology and Soils);

- (7) preservation of landmarks and historic buildings (Initial Study topic 4a, Cultural and Paleontological Resources); and
- (8) protection of parks and open space and their access to sunlight and vistas (Initial Study topics 4a and 4c, Recreation; and project shadow impacts to be analyzed in the Shadow section of the EIR).

Prior to issuing a permit for any project which requires an Initial Study under CEQA, prior to issuing a permit for any demolition, conversion, or change of use, and prior to taking any action which requires a finding of consistency with the *General Plan*, the City is required to find that the proposed project or legislation would be consistent with the Priority Policies. As noted above, the proposed project's potential to conflict with the Priority Policies is discussed in this Initial Study or in the EIR. Staff reports and approval motions prepared for the decision-makers would include a comprehensive project analysis and findings regarding the consistency of the proposed project with the Priority Policies.

Draft Japantown Cultural Heritage and Economic Sustainability Strategy (JCHESS)

Japantown has recently been the focus of a community planning effort, initiated formerly as part of the Planning Department's Better Neighborhoods planning program. On February 26, 2013, community stakeholders, the Planning Department, and the Office of Economic and Workforce Development through its Invest in Neighborhoods program published the draft *Japantown Cultural Heritage and Economic Sustainability Strategy* for public review.⁷ The Japantown cultural heritage and economic strategies are focused on a 20-block area bounded by Steiner Street on the west, California Street on the north, Gough Street on the east, and O'Farrell Street, Ellis Street, and Geary Boulevard on the south. The project site at 1481 Post Street/1333 Gough Street is within the area within which community stakeholders are considering applying Japantown economic cultural strategies.

The JCHESS stakeholder efforts are unique in San Francisco in that the economic and community development strategies focus heavily on the preservation and promotion of the neighborhood's cultural heritage. The JCHESS objectives seek to:

- Secure Japantown's future as the historical and cultural heart of Japanese and Japanese American Community.
- Secure Japantown's future as a thriving commercial and retail district.
- Secure Japantown's future as a home to residents and community-based institutions.
- Secure Japantown's future as a physically attractive and vibrant environment.⁸

⁷ Japantown Organizing Committee, San Francisco Planning Department, and the Office of Economic and Workforce Development, *JCHESS Japantown Cultural Heritage and Economic Sustainability Strategy*, Revised Initial Draft, February 26, 2013. This document is available for review on the Planning Department's website at www.sfplanning.org/index.aspx?page=1692

⁸ JCHESS, p. ES-1.

While the overall focus of most aspects of JCHESS is on cultural heritage and economic sustainability and is outside the scope of typical topics of a neighborhood or land use plan, the JCHESS recommends land use planning strategies to those ends, including amending the existing NC-2 (Small-Scale Neighborhood Commercial) and NC-3 (Moderate-Scale Neighborhood Commercial) Districts in the study area by creating a “named” Japantown NC District. A Planning Code amendment could include modifications to existing land use controls related to the types of uses permitted; requirements for ground-floor commercial use on NC-designated parcels; and revisions to residential density limits.⁹ The JCHESS also recommends adoption of Japantown-specific design guidelines in order to “encourage culturally relevant architecture in new building/site designs and in renovations and additions to older buildings/sites,” and recommends improvements to Peace Plaza and Buchanan Mall.¹⁰

Other Local Plans and Policies

In addition to the Planning Code, the Zoning Maps, and the *General Plan*, other local plans and policies that are relevant to the proposed project are discussed below.

- The *San Francisco Sustainability Plan* is a blueprint for achieving long-term environmental sustainability by addressing specific environmental issues including, but not limited to, air quality, climate change, energy, ozone depletion, and transportation. The goal of the *San Francisco Sustainability Plan* is to enable the people of San Francisco to meet their present needs without sacrificing the ability of future generations to meet their own needs.
- The *Climate Action Plan for San Francisco: Local Actions to Reduce Greenhouse Emissions* is a local action plan that examines the causes of global climate change and human activities that contribute to global warming, provides projections of climate change impacts on California and San Francisco based on recent scientific reports, presents estimates of San Francisco’s baseline greenhouse gas emissions inventory and reduction targets, and describes recommended actions for reducing the City and County’s greenhouse gas emissions.
- The Transit First Policy (City Charter, Section 8A.115) is a set of principles that underscore the City’s commitment to give priority to traveling by transit, bicycle, and on foot over traveling by private automobile. These principles are embodied in the objectives and policies 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 the City’s affairs.
- The *San Francisco Bicycle Plan* is a citywide bicycle transportation plan that identifies short-term, long-term, and other minor improvements to San Francisco’s bicycle route network. The overall goal of the *San Francisco Bicycle Plan* is to make bicycling an integral part of daily life in San Francisco.

⁹ JCHESS, p. 5-18.

¹⁰ JCHESS, p. 5-19 – 5-22.

- The *San Francisco Better Streets Plan* consists of illustrative typologies, standards and guidelines for the design of San Francisco's pedestrian environment, with the central focus of enhancing the livability of the City's streets.

The proposed project would intensify land uses on an urban infill site, and to the extent that there are conflicts between the proposed project and local plans, policies, and regulations, those conflicts would be considered by City decision-makers when they decide whether to approve, modify, or disapprove the proposed project. The EIR will evaluate the project for potential conflicts with plans and policies adopted to protect the environment.

Other Plans and Policies

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

- The Bay Area Air Quality Management District's *Bay Area 2010 Clean Air Plan* updates the Bay Area 2005 Ozone Strategy, in accordance with the requirements of the California Clean Air Act, to implement feasible measures to reduce ozone and provide a control strategy to reduce ozone, particulate matter, air toxics, and greenhouse gases throughout the region.
- The Regional Water Quality Control Board's *Water Quality Control Plan for the San Francisco Bay Basin* is a master water quality control planning document. It designates beneficial uses and water quality objectives for waters of the state, including surface waters and groundwater, and includes implementation programs to achieve water quality objectives.
- The Metropolitan Transportation Commission's *Transportation 2035 Plan for the San Francisco Bay Area* is a policy document that outlines transportation projects for highway, transit, rail, and related uses through 2035 for the nine Bay Area counties.
- The Association of Bay Area Governments' *Projections 2009* is an advisory policy document that includes population and employment forecasts to assist in the development of local and regional plans and policy documents.

The proposed project would not obviously or substantially conflict with the above adopted plans or policies.

D. SUMMARY OF ENVIRONMENTAL EFFECTS

The proposed project could potentially affect the environmental factor(s) checked below. The following pages present a more detailed checklist and discussion of each environmental factor.

<input checked="" type="checkbox"/> Land Use	<input checked="" type="checkbox"/> Air Quality	<input type="checkbox"/> Biological Resources
<input checked="" type="checkbox"/> Aesthetics	<input type="checkbox"/> Greenhouse Gas Emissions	<input type="checkbox"/> Geology and Soils
<input type="checkbox"/> Population and Housing	<input checked="" type="checkbox"/> Wind and Shadow	<input type="checkbox"/> Hydrology and Water Quality
<input type="checkbox"/> Cultural and Paleo. Resources	<input type="checkbox"/> Recreation	<input type="checkbox"/> Hazards/Hazardous Materials
<input checked="" type="checkbox"/> Transportation and Circulation	<input type="checkbox"/> Utilities and Service Systems	<input type="checkbox"/> Mineral/Energy Resources
<input checked="" type="checkbox"/> Noise	<input type="checkbox"/> Public Services	<input type="checkbox"/> Agricultural and Forest Resources
		<input checked="" type="checkbox"/> Mandatory Findings of Significance

Effects Found to Be Potentially Significant

This Initial Study evaluates the proposed 1333 Gough Street/1481 Post Street 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 include:

- Land Use and Land Use Planning (all topics except physical division of established communities)
- Aesthetics (all topics except light and glare)
- Transportation and Circulation (all topics)
- Noise (all topics)
- Air Quality (all topics except odors)
- Wind and Shadow (all topics)

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 (physical division of established communities)
- Aesthetics (light and glare)
- Population and Housing (all topics)
- Cultural and Paleontological Resources (all topics)

- Air Quality (odors)
- Greenhouse Gas Emissions (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)
- Agricultural and Forest Resources (all topics)

These items are discussed with recommended mitigation measures, where appropriate, in Sections E and F, and require no environmental analysis in the EIR. All mitigation measures identified, including those for archaeological resources and hazards, have been agreed to by the project sponsor and will be incorporated into the proposed project. For items designated “Not Applicable,” 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 San Francisco Planning Department’s October 2002 *Transportation Impact Analysis Guidelines for Environmental Review* (SF Guidelines) and the California Natural Diversity Database and maps published by the California Department of Fish and Wildlife. For each checklist item, the evaluation has considered both individual and cumulative impacts of the proposed project.

Foreseeable Cumulative Projects

As indicated in the proceeding checklist responses, the EIR will evaluate the project’s potential to cause or contribute to cumulative impacts. *Cumulative impacts* are two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts. The individual effects may be changes resulting from a single project or a number of separate projects. Cumulative impacts are impacts of the project in combination with other closely related past, present and reasonably foreseeable probable future projects. (CEQA Guidelines Section 15355(a)(b))

CEQA Guidelines Section 15130(b)(1) sets forth two primary approaches to the analysis of cumulative impacts. The analysis can be based on (a) a list of past, present, and probable future projects producing 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. The cumulative analyses in this Initial Study employ both list- and projections-based approaches,

depending on which is best suited to the individual resource topic. The analysis of aesthetic effects, for instance, uses the list-based approach to review the project in conjunction with other nearby foreseeable projects in evaluating whether in combination they would adversely affect scenic vistas or views. The Initial Study's transportation and circulation analysis uses citywide growth projections that incorporate the proposed project in combination with others in the assessment of potential impacts, which is the standard methodology that the San Francisco Planning Department applies to transportation analyses.

Reasonably foreseeable probable future projects are those for which the Planning Department has an Environmental Evaluation application on file. These projects are located within about a quarter-mile radius of the project site and include the following:

- **1545 Pine Street (Case No. 2006.0383E):** This project entails the demolition of five existing commercial buildings and the construction of a 6-story building and a 14-story building containing a total of 123 dwelling units, 113 parking spaces, and approximately 10,000 gsf of commercial space.
- **1634-1690 Pine Street (Case No. 2011.1306E):** This project encompasses the demolition of five existing commercial and industrial buildings and the construction of two residential towers containing up to 260 dwelling units, 262 parking spaces, and approximately 4,900 gsf of commercial space.
- **1101 Van Ness Avenue / 1255 Post Street (Case No. 2005.0555E):** This project calls for the demolition of the Cathedral Hill Hotel and office building and the construction of California Pacific Medical Center (CPMC)'s Cathedral Hill medical campus, which would include a hospital building (989,230 gsf, 12 stories, 226 feet tall, 304 beds, as approved) and a medical office building on the east side of Van Ness Avenue between Geary and Post Streets.
- **1800 Van Ness Avenue / 1749 Clay Street (Case No. 2004.0339E):** This project includes the construction of an 8-story building and a 4-story building which together would contain 98 dwelling units, 103 parking spaces, and approximately 4,900 gsf of commercial space.
- **Geary Bus Rapid Transit (BRT) project (SCH No. 2008112095):** This is a program to improve Muni bus service along Geary Street / Geary Boulevard through the implementation of operational and physical improvements. Operational improvements consist of (1) designating bus-only lanes to allow buses to travel with fewer impediments, (2) adjusting traffic signal timing to give buses more green lights 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.
- **Van Ness BRT project (SCH No. 2007092059):** This is a program to improve Muni bus service along Van Ness Avenue between Lombard and Mission Streets that entails the same types of operational and physical improvements discussed under the Geary BRT project.

- **Transit Effectiveness Project (TEP) (Case No. 2011.0558E):** This is a joint effort between the San Francisco Municipal Transportation Agency, the Planning Department, and the Controller's Office to maximize Muni service delivery. The objectives of the TEP are to improve service reliability, reduce transit travel time, enhance customer experiences, and improve service effectiveness and efficiency. The TEP is comprised of four major categories: a service policy framework, service improvements, service-related capital projects, and travel time reduction proposals.
- **Japantown Cultural Heritage and Economic Sustainability Strategy:** The draft JCHESS was developed by community stakeholders in partnership with the Planning Department and the City's Office of Economic and Workforce Development. While cultural heritage, community development and economic sustainability initiatives are central to the study, the JCHESS also includes a number of recommendations that pertain to land use and planning. These include amending the Planning Code to incorporate a to-be-developed Japantown NC (Neighborhood Commercial) District controls that could be fine-tuned to reflect the prevailing characteristics of Japantown. These controls could require buildings located on Japantown NC-designated properties to include active ground-floor commercial uses; they could entail a limitation of certain uses that the community finds incompatible; and could result in amendments to existing residential density limits to incentivize residential development in the neighborhood. The JCHESS also broadly recommends developing Japantown-specific design guidelines, implementing the *Better Streets Plan* within the neighborhood over time as well as calling for public realm improvements at Peace Plaza and Buchanan Mall. See pp. 37-38 for further discussion of the JCHESS.

E. EVALUATION OF ENVIRONMENTAL EFFECTS

Topics:	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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Have a substantial impact upon the existing character of the vicinity?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Impact LU-1: The proposed project would not physically divide an established community. (Less than Significant)

The proposed project would not create a physical barrier to neighborhood access or remove an existing means of access. The proposed project would be developed within the delineated limits of its lot; it would not alter the established street grid, nor would it permanently close any streets or sidewalks. Rather, the proposed project would include a pedestrian walkway along the site's

western property line where no such path currently exists. This pathway would facilitate midblock pedestrian passage between Post Street and Geary Boulevard during daylight hours where no access currently exists. For these reasons, the proposed project would have a less-than-significant effect regarding physically dividing the surrounding community.

Impact LU-2: The proposed project would conflict with applicable land use plans, policies, or regulations of an agency with jurisdiction over the project (including, but not limited to, a General Plan, Specific Plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect. (Potentially Significant)

The proposed project would conflict with the project site's existing height and bulk limit. The project site is in a 240-E Height and Bulk District, which allows a maximum building height of 240 feet. At a height of 398 feet to its rooftop (416 feet to the top of its mechanical penthouse enclosure), the proposed tower would exceed the 240-foot height limit. Above a height of 65 feet, the proposed tower would have an east-west horizontal dimension of 118 feet, and would exceed the maximum horizontal dimension of 110 feet permitted in an "E" Bulk District. As discussed in Section C, Compatibility with Existing Zoning and Plans, the project sponsor would propose Planning Code text and Zoning Map amendments in conjunction with the request to reclassify the existing height and bulk limit for the project site from 240-E to 410-G. A conflict with existing height and bulk limits could result in physical effects such as shadow on public spaces and aesthetic impacts. As such, the proposed project could potentially result in conflicts with plans and policies such that potentially significant adverse, physical effects may occur; these topics will therefore be discussed and analyzed in the EIR.

Impact LU-3: The proposed project could have a substantial impact on the existing character of the vicinity. (Potentially Significant)

The proposed project's building, at 398 feet tall, would exceed the site's permitted height by 158 feet. At 398 feet, the project building would be substantially taller than the existing buildings in its vicinity. The proposed building would also be somewhat bulkier than permitted by the site's 240-E Height and Bulk District provisions. As such, the proposed project could have a substantial impact on the existing character of the vicinity. This topic will be discussed and analyzed in the EIR.

Cumulative Impacts

Impact C-LU-1: The proposed project, in combination with past, present, and reasonably foreseeable future projects in the site vicinity, could potentially result in a cumulatively considerable contribution to a significant land use impact. (Potentially Significant)

As discussed above under Impact LU-1, the proposed project would not create a physical barrier to neighborhood access or remove an existing means of access. Rather, the proposed project would provide a new pedestrian walkway along the western property line of the project site to allow public passage between Post Street and Geary Boulevard through the block during daylight

hours. No other foreseeable projects are proposed adjacent to the project site that could combine with it to physically divide the surrounding community. The proposed project would not contribute to a significant cumulative impact related to physical division of a community.

As discussed above under Impact LU-2 and LU-3, however, the proposed project would exceed the site's permitted height and bulk limit. Thus, the proposed project could conflict with established plans and policies that regulate the scale of the built environment, land use intensity, and neighborhood character. The project may contribute to adverse physical changes to neighborhood character in combination with other projects in the surrounding area. For these reasons, the proposed project's cumulative land use impacts with regard to conflicts with plans and policies and adverse impacts to neighborhood character are considered potentially significant and will be discussed in the EIR.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
2. AESTHETICS—Would the project:					
a) Have a substantial adverse effect on a scenic vista?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and other features of the built or natural environment which contribute to a scenic public setting?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area or which would substantially impact other people or properties?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Impact AE-1: The proposed project could have a substantial adverse effect on scenic vistas, could substantially damage scenic resources, and could substantially degrade the existing visual character and quality of the site and its surroundings. (*Potentially Significant*)

In San Francisco, scenic vistas are generally regarded as views with unique or outstanding characteristics that are available from publicly accessible spaces. The Urban Design Element of the *General Plan* places substantial emphasis on the protection of views of open space and water bodies. Scenic vistas are most expansive from San Francisco's numerous hilltops. The Urban Design Element of the *General Plan* identifies "Street Areas Important to Urban Design and Views" and maps streets based on the quality of their views. The project site is not located within or along any street segment in the *General Plan* identified for the quality of its views.

Scenic resources include trees, rock outcroppings, and other landscape features that contribute to the scenic character of a public area. The *General Plan* does not specify any such scenic features at or adjacent to the project site. The project site is located on Cathedral Hill, a topographic

feature that visually expresses the area's form and contributes to the overall image of the City. Given its central location, its elevation at about 200 feet above sea level and its cluster of existing buildings that reach heights of up to 396 feet, Cathedral Hill is visible from many public vantage points within the City. The proposed project entails construction of a 36-story high-rise tower on the project site, which could be prominent from numerous distant vantage points in the western part of the City. While the General Plan does not specifically designate views to or of Cathedral Hill as particularly "scenic," the project's height and location may substantially alter the existing views and vistas of Cathedral Hill, which this Initial Study considers to be a potentially significant impact. Implementation of the proposed project may substantially alter the visual character of its surrounding streetscape and skyline. The proposed high-rise residential tower would be substantially taller than nearby buildings in its immediate vicinity and taller than current 240-E Height and Bulk District limits permit. Implementation of the proposed project could therefore adversely affect the visual character and quality of the site and its surroundings if it were to introduce a new building of discordant scale and/or include physical features that are visually incompatible with the surroundings. Therefore, this Initial Study considers Impact AE-1 potentially significant. The EIR will therefore analyze project impacts associated with scenic vistas, scenic resources and the visual quality of the site and its surroundings. The EIR will incorporate the relevant policies and objectives of the *General Plan's* Urban Design Element in the evaluation and analysis of potential aesthetic impacts.

Impact AE-2: The proposed project would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area or which would substantially impact other people or properties. (*Less than Significant*)

Current sources of light on the project site and surrounding area include nighttime residential lighting within existing buildings, and illuminated streets, residential complexes, and building entrances in the vicinity of the project site. The proposed project could increase the amount of light emitted from the site. New lighting would include light emitted from the proposed new residential tower residential units and from the proposed common open spaces within the project site. New exterior lighting fixtures would illuminate building entrances and pedestrian walkways at the ground floor of the proposed development. Light and glare from the proposed project would be typical of residential complexes nearby and throughout the City. Light levels from the proposed project would not exceed levels commonly accepted by residents in an urban setting and would be consistent with those of an urban residential neighborhood. Given the existing urban character of the site and its surroundings, potential new sources of light and glare on the project site would not constitute a substantial source of new light in the vicinity of the project site. The proposed project would comply with Planning Commission Resolution No. 9212, which prohibits the use of mirrored or reflective glass. Exterior lighting for the proposed project would be positioned to minimize glare and would not be in excess of that commonly found in urban areas. For these reasons, the proposed project would have a less-than-significant impact related to light and glare. No mitigation is necessary.

Cumulative Impacts

Impact C-AE-1: The proposed project, in combination with past, present, and reasonably foreseeable future projects in the site vicinity, could result in a cumulatively considerable contribution to a significant cumulative impact related to aesthetics. (*Potentially Significant*)

The aesthetic impacts of the proposed project could combine with those of other foreseeable projects in its vicinity to result in a cumulatively considerable contribution to a significant cumulative impact on a scenic vista, scenic resource, or on visual character and quality of the site and its surroundings. Cumulative impacts related to aesthetics will be addressed in the EIR.

Light and glare impacts of the proposed project would be localized, as would those of existing surrounding land uses and foreseeable future projects. They would not combine to result in a significant cumulative impact related to light and glare. As discussed above under Impact AE-2, given the residential character of the proposed project, and the existing urban character of the site and its surroundings, potential new sources of light and glare on the project site would not constitute a substantial source of new light in the vicinity of the project site. Likewise, the proposed project would not make a cumulatively considerable contribution to any potential cumulative impact related to light and glare.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
3. 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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Displace substantial numbers of existing housing units or create demand for additional housing, necessitating the construction of replacement housing?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Impact PH-1: The proposed project would not induce substantial population growth in an area, either directly or indirectly. (*Less than Significant*)

In general, a project would be considered growth inducing if its implementation were to result in a substantial population increase, and/or new development that might not occur if the project were not implemented. As described in the Project Description, pp. 6-26 of this Initial Study, the proposed project entails 262 new residential units and ancillary fitness, café and building management/operations uses that would increase population at the project site and contribute to

anticipated population growth citywide. There would be no change to the existing 169 residential units in the 1333 Gough Street building.

The 2010 U.S. Census reported a population of 805,235 in the City and County of San Francisco,¹¹ and indicates that the population in Census Tract 155, which includes the project site and its immediate vicinity, is 3,622 persons.^{12,13} The population of adjacent Census Tracts within a roughly 0.25-mile radius of the project site is approximately 18,876 persons.¹⁴ Based on an average household size for San Francisco of 2.28 persons per unit,¹⁵ the addition of 262 residential units would increase the population on the project site by approximately 597 residents. This figure would represent about a 16 percent increase in population within Census Tract 155; approximately 3.2 percent within the project area, i.e., the adjacent Census Tracts; and approximately 0.07 percent citywide. Relative to future population forecasts, the proposed project would represent approximately 0.5 percent of the projected citywide increase between 2010 and 2030.¹⁶ The project would contribute to local and citywide population growth consistent with regional forecasting. It would not indirectly induce substantial population growth, nor would it necessitate changes to area roads or utilities to accommodate its projected infrastructure demands.

The proposed project would not change the number of residents at the 1333 Gough Street building, but could result in an increase in the number of visitors to the future fitness center at 1333 Gough Street (conservatively, estimated to be about 230 new daily visitors to the future fitness center¹⁷). Currently, 1333 Gough Street has 12 management and maintenance employees and the Cathedral Hill Plaza Athletic Club has 11 employees on its payroll. There are also a

¹¹ U.S. Census Bureau, American FactFinder, Profile of General Population and Housing Characteristics: 2010, 2010 Demographic Profile Data. Available online at <http://factfinder2.census.gov/faces/nav/jsf/pages/index.xhtml>. Accessed September 14, 2012.

¹² Census Tract 155 is bounded by Pine Street to the north, Gough Street to the east, Geary Boulevard to the south and Baker Street to the west.

¹³ U.S. Census Bureau, American FactFinder, Profile of General Population and Housing Characteristics: 2010, 2010 Demographic Profile Data. Available online at <http://factfinder2.census.gov/faces/nav/jsf/pages/index.xhtml>. Accessed September 14, 2012.

¹⁴ Census Tracts 151, 152, 153, 158.01, 159, and 160. U.S. Census Bureau, American FactFinder, Profile of General Population and Housing Characteristics: 2010, 2010 Demographic Profile Data. Available online at <http://factfinder2.census.gov/faces/nav/jsf/pages/index.xhtml>. Accessed September 14, 2012.

¹⁵ Association of Bay Area Governments (ABAG), *Projections and Priorities 2009, Building Momentum, San Francisco Bay Area Population, Households, and Job Forecasts* (hereinafter *Projections and Priorities 2009*). Census Tract 155 had an average household size of 1.60 persons in 2010. The household size in Census Tract 155 is smaller than the citywide number because the tract has a high number of seniors relative to the City as a whole. The ABAG (citywide) data were used because they are more conservative and more representative of the anticipated population of the proposed project.

¹⁶ ABAG, *Projections and Priorities 2009*, p. 92. ABAG projects San Francisco's population to increase by 129,565 persons over the 2010 to 2030 period, with the City's population in 2030 projected to be 934,800 persons.

¹⁷ LCW Consulting, Trip Generation Calculations Table, April 4, 2013. This value is based on a daily trip generation factor for the proposed 8,000 sq. ft. fitness center expansion. It includes visits by new members as well as increased visits to the improved facility by current members.

number of independent contractors (three class instructors, three personal trainers, and four tennis instructors) who teach classes or provide personal training on a limited basis, and whose composition and hours may change with increased membership. Under the proposed project, the fitness center would continue to be used by member residents of 1333 Gough Street and be open to members from the outside. The project sponsor anticipates that club members would continue to consist primarily of neighborhood residents. The project sponsor estimates the total membership of the fitness center to increase from about 200 existing members to about 400 members after completion of the proposed fitness center upgrades. However, the project sponsor does not expect that the proposed upgrades to the fitness center would require a substantial change in the current number of fitness center employees and independent contractors.¹⁸

Implementation of the proposed project would result in an increase in employment on the project site. There would be 15 new employees associated with the management and maintenance of the proposed 1481 Post Street building, and 10 new employees associated with the 2,460 gsf café, and 6 new employees associated with the fitness amenity in the proposed 1481 Post Street building. Thus there would be a total of 31 new employees associated with the proposed project.

San Francisco's overall employment is projected to increase by approximately 179,370, from about 568,730 employees in 2010 to approximately 748,100 in 2030.¹⁹ Even if all of the employees associated with the proposed project were conservatively assumed to be new to San Francisco, the project-related increase of up to 31 new employees would represent considerably less than 1 percent (0.02 percent) of the City's estimated employment growth between the years 2010 and 2030. This potential citywide employment increase would be negligible in the context of total employment in San Francisco. Therefore, implementation of the proposed project would not induce substantial growth or concentration of employment that would cause a substantial adverse physical change to the environment.

The proposed project would also contribute to the City's broader need for additional housing given that job growth and in-migration outpace the provision of new housing. In June 2008, the Association of Bay Area Governments (ABAG) projected regional needs in its Regional Housing Needs Determination (RHND) 2007–2014 allocation. The projected housing need of the City and County of San Francisco from 2007 to 2014 is 31,193 total new residential units, or an average

¹⁸ According to the project sponsor, operation of the fitness center requires a fixed level of employees on payroll that is independent of the number of members (e.g., reception desk, operations manager, and fitness director). The existing fitness center facility is underutilized, particularly since the permanent closure of the pool in 2010. The current level of employees would support the anticipated increase in membership after the proposed facility upgrades are completed. Additionally, independent contractor tennis instructors would no longer be needed with the elimination of the tennis courts, thereby more than offsetting the anticipated need for new independent contractor instructors and trainers to serve the anticipated growth in membership. Turnstone Consulting, Memorandum: 2/19/2013 Communication with Eric Grossberg, Managing Director, ADCO, February 19, 2013. This document is available for review in Case File No. 2005.0679E at the San Francisco Planning Department, 1650 Mission Street, Suite 400.

¹⁹ ABAG, *Projections and Priorities 2009*, p. 92.

annual need of 4,456 net new residential units. The proposed project would add up to 262 residential units to the City's housing stock, thereby helping to meet the City's overall housing demands.

There is a particular need in the City for units affordable to very low-, low-, and moderate-income households. The proposed project is subject to the provisions of Planning Code Section 415: Inclusionary Affordable Housing Program, which requires projects of five or more residential units to contribute to the creation of Below Market Rate (BMR) housing, either through direct development of BMR residential units within the project (equal to 15 percent of the project's overall residential units), within a separate building within one mile of the project site (equal to 20 percent of the project's overall residential units), or through an in-lieu payment to the Mayor's Office of Housing. The proposed project would add 262 new market-rate residential units to the City's housing stock and would meet the 20 percent requirement for affordable housing off site (approximately 52 BMR units) in compliance with Planning Code Section 415, or in the alternative, through payment of an in-lieu fee if a suitable off-site location cannot be arranged.

Overall, project-related increases in housing supply and employment would be less than significant in relation to the existing number of residents and employees in the project vicinity and to the expected increases in the residential and employee populations of San Francisco. In terms of the fitness center, potential increases in membership and visitor levels, likewise, would not be considered substantial in relation to the existing number of residents and employees in the project vicinity. Increased visitors to the fitness center are expected to be drawn from the existing population of the greater San Francisco area, and would not be induced to relocate to the area based solely on the improved fitness center facility. Therefore, the proposed project would not directly or indirectly induce substantial population growth or concentration of employment in the project area and citywide such that an adverse physical change to the environment would occur. This impact would be less than significant, and no mitigation is necessary.

Impact PH-2: The proposed project would not displace substantial numbers of existing housing units or create demand for additional housing, necessitating the construction of replacement housing elsewhere. (*Less than Significant*)

The proposed project would not displace existing housing, including the existing residential units in 1333 Gough Street. The project would increase housing and ancillary employment on the site. Increases in project site employment may result in an increase in the demand for housing. San Francisco has an estimated 346,680 households, which are expected to increase by approximately 54,020 to about 400,700 by 2030.²⁰ According to the City's *2004 and 2009 Housing Element*

²⁰ ABAG, *Projections and Priorities 2009*, p. 92.

Draft EIR, San Francisco is projected to increase by 52,051 housing units between 2010 and 2030 period.²¹

According to *ABAG Projections and Priorities 2009*, San Francisco has an estimated 1.19 workers per household. Assuming conservatively that new project employees would be new San Francisco residents, the estimated 31 employees attributable to the proposed project would generate a demand for about 26 new residential units by 2030. The proposed project's employment-related housing demand could be accommodated by the City's projected housing unit growth between 2010 and 2030.²² The proposed project's employment-related housing demand would represent less than 1.0 percent (.05 percent) of the City's estimated household growth between the years 2010 and 2030.

This potential increase in employment-related housing demand would not be considered substantial in the context of total housing demand in San Francisco over the same time period (2010 to 2030). Additionally, because some of the proposed project's employees may not be new to San Francisco, project employment-generated housing demand is likely to be lower than reported here. Finally, the project would contribute 262 new units to the city's housing stock, offsetting demands caused by its incremental employment increases. Given all of the above, the proposed project would have a less-than-significant impact on housing displacement and demand. It would not create substantial demand for additional housing that would necessitate the construction of replacement housing, and no mitigation is necessary.

Impact PH-3: The proposed project would not displace substantial numbers of people, necessitating the construction of replacement housing elsewhere. (*Less than Significant*)

The project would neither result in demolition of existing residential units on the site nor would a new residential building at 1481 Post Street displace existing residents on site at 1333 Gough Street. The project would be additive to the site's residential use and replacement housing elsewhere would not be required. As described in the Project Description, project construction would necessitate temporary closure of the Cathedral Hill Plaza Athletic Club during remodeling of the facility. This temporary closure would temporarily displace 11 employees and would not require the construction of replacement housing elsewhere.

²¹ San Francisco Planning Department, *2004 and 2009 Housing Element Draft EIR*, Table V-D-2, p. V.D.2. Available online at http://sfmea.sfplanning.org/2007.1275E_DEIR.pdf. Accessed August 21, 2012.

²² ABAG, *Projections and Priorities 2009* and the *2004 and 2009 Housing Element Draft EIR*.

Cumulative Impacts

Impact C-PH-1: The proposed project, in combination with past, present, and reasonably foreseeable future projects in the site vicinity, would not result in a cumulatively considerable contribution to significant cumulative population and housing impacts. (*Less than Significant*)

The proposed project would neither eliminate existing housing units nor displace residents or people. As discussed under Impacts PH-1 and PH-2, reasonably foreseeable projects in combination with the proposed project would contribute to localized and citywide employment and population growth. A list of foreseeable future projects is presented on pp. 41-43 of this Initial Study. Foreseeable projects in the site's vicinity would contribute to new housing units in the area that could incrementally offset forecast demands for housing within the neighborhood and citywide.

The three foreseeable residential and mixed-use projects in the vicinity of the project site (1545 Pine Street, 1634-1690 Pine Street and 1800 Van Ness Avenue / 1749 Clay Street) would result in a total of 481 new dwelling units, which, when occupied, could increase local population by 1,097 residents. These new residents would represent an increase of 5.8 percent above the population of 18,876 persons in Census Tracts within about a quarter-mile radius of the project site.²³

CPMC's Cathedral Hill medical campus (1101 Van Ness Avenue / 1255 Post Street) would increase employment at that site by 4,030 full time equivalents (FTEs), which would be expected to generate 3,230 new San Francisco residents under the plan studied in the EIR for that project.²⁴ After relocation of workers from other campuses was considered, the number of new CPMC FTEs was determined to be 630, who would generate 370 new City households and 830 new City residents.²⁵

The Van Ness and Geary Street Bus Rapid Transit projects would not generate population growth and would thus not contribute to significant impacts on population and housing and would not combine with the project to result in considerable population growth.²⁶ Similarly, the JCHES strategies seek to stabilize and strengthen Japantown's economic and cultural activities and attributes. The project would not combine with JCHES strategies or foreseeable Planning Code

²³ Census Tracts 151, 152, 153, 158.01, 159, and 160. U.S. Census Bureau, American FactFinder, Profile of General Population and Housing Characteristics: 2010, 2010 Demographic Profile Data. Available online at <http://factfinder2.census.gov/faces/nav/jsf/pages/index.xhtml>. Accessed February 27, 2013.

²⁴ City and County of San Francisco Planning Department, *CPMC Long Range Development Plan Final EIR*, April 26, 2012, p. 4.3-19.

²⁵ The forecasts in the *CPMC Long Range Development Plan EIR* are conservative in that they overstate the expected future impact, assuming a hospital development that is larger than that project as approved.

²⁶ City and County of San Francisco, Transit Effectiveness Project Initial Study, January 23, 2013, p. 197-198; San Francisco County Transportation Authority, *Van Ness Avenue Bus Rapid Transit Project Draft EIS/EIR*, October 2011, pp. 4.3-1 – 4.3-2, and p. 5-4. It is expected that similar conclusions related to population and housing impacts would be reached in draft EIS/EIR when it is published.

amendments in such a manner as to considerably induce population local growth or displace housing resources or area residents.

Therefore, the project's 262 residential units and estimated 597-person resident population would combine with the 481 units and 1,097 new residents associated with the foreseeable mixed use projects in the vicinity as well as with the demand for 370 units and resultant 830 residents forecast associated with the CPMC Cathedral Hill campus. The cumulative population growth and housing demand is consistent with citywide and regional projections. Therefore, the proposed project, in combination with past, present, and reasonably foreseeable future projects, would not make a considerable contribution to potentially significant cumulative effects related to population and housing.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
4. CULTURAL AND PALEONTOLOGICAL RESOURCES—Would the project:					
a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5, including those resources listed in Article 10 or Article 11 of the San Francisco Planning Code?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Impact CP-1: The proposed project would not cause a substantial adverse change in the significance of an historic architectural resource. (No Impact)

The project site is occupied by a 169-unit concrete apartment building at 1333 Gough Street that was constructed in 1965. The project site contains no properties included in, or determined eligible for inclusion in, any federal, state, or adopted local register of historic resources (including the National Register of Historic Places, the California Register of Historical Resources (CRHR), and Planning Code Articles 10 and 11), pursuant to CEQA Guidelines, Section 15064.5(a)(1) and (2). As such, there is no evidence that the 1333 Gough Street building is an historic architectural resource pursuant to CEQA Guidelines, Section 15064.5(a)(3).

As a structure that is less than 50 years of age (as of the date of this Notice of Preparation / Initial Study) and for which the City has no information indicating that the structure qualifies as an historical resource, the 1333 Gough Street building is considered a “Category C” property under

the San Francisco Planning Department's *CEQA Review Procedures for Historic Resources*, and is not considered an historical resource for the purposes of CEQA.²⁷

Japantown Historic Resource Survey

The 1333 Gough Street building was included in the *Japantown Historic Resource Survey*²⁸ (Japantown Survey) conducted by Page & Turnbull under the auspices of the San Francisco Planning Department as part of the Draft *Japantown Better Neighborhood Plan*. The survey area covers approximately 40 blocks bounded by Steiner Street to the west, California Street to the north, Gough Street to the east, and Ellis Street and O'Farrell Streets to the south.

The survey identified a potential historic district, the "Japantown Community and Cultural Historic District." Its period of significance is circa 1906 to circa 1960, spanning the year when Japanese first began to settle in the neighborhood, through the era of growth and development of the ethnic community during the first part of the 20th century, and up to the close of post-World War II resettlement and the beginning of the period of federally funded urban renewal projects in Japantown and the greater Western Addition.

The potential district is comprised of 95 parcels, including 87 contributing properties and 8 non-contributing properties, reflecting residential, institutional and mixed-use (residential and commercial) property types that together form a cohesive culturally themed built landscape. In the portion of the survey area south of Bush Street, all properties built prior to 1975 (including 1333 Gough) were surveyed and documented on California Department of Parks and Recreation (DPR 523A forms). The potential historic district is associated with important events, patterns, and trends related to the social, cultural, and physical history of the Japantown neighborhood. The survey assigned the district a status code of 7N1, meaning that it may become eligible for listing in the National Register of Historic Places when it meets specific conditions. The 1333 Gough Street building is outside of the eligible Japantown Community and Cultural Historic District. Moreover, the survey did not identify 1333 Gough Street as individually eligible for designation as a historic resource on the California Register of Historical Resources, nor did it identify the 1333 Gough Street building as eligible as a contributory resource to the Japantown Community and Cultural Historic District.

Social Heritage Survey

The Japantown neighborhood has been the focus of community interest in the arena of social heritage resource survey work. This Initial Study includes a description of the cultural heritage work for informational purposes.

²⁷ City and County of San Francisco Planning Department, Draft *CEQA Review Procedures for Historic Resources*, March 31, 2008, pp. 3-8.

²⁸ Page & Turnbull, *Japantown Better Neighborhood Plan Historic Resources Survey Report*, May 2009.

The term *social heritage* is defined herein similar to the definition used by the National Park Service.²⁹ In the context of Japantown, social heritage is understood to mean: “Those elements, both tangible and intangible, that help define the beliefs, customs and practices of a particular community. These elements are rooted in the community’s history and/or are important in maintaining the continuing cultural identity of the community.”

Within Japantown, the social heritage survey work has to date focused on seven broad resource categories: celebrations and festivals; folklore, stories, language and literature; traditional and evolving crafts and performing arts; cultural properties, buildings, structures and archives; businesses; institutions including churches, non-profit organizations, schools and clubs; and sports, games, health and fitness. The survey work has identified 104 resources suitable for recordation on the Planning Department’s Social Heritage Inventory Record forms. The building at 1333 Gough Street was not identified as a social heritage resource as part of this survey.

As indicated above, the information pertaining to social heritage surveys and resources has been presented for informational purposes. For CEQA purposes, the Planning Department considers “cultural resources” to be those that fit within the following definition: “Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an historic resource, provided the lead agency’s determination is supported by evidence in light of the whole record.”³⁰ In light of the above, land uses, festivals and other ephemeral or transitory events do not fit within the definition of what may be considered a potential resource under CEQA.

Indirect Effects to Off-Site Resources

The project site is adjacent to a grouping of six Victorian-era row houses built around the turn of the 20th century at the northwest corner of the Gough and Post Street intersection across Post Street from the east end of the project site (1400 Post Street, 1402 Post Street, 1406-1408 Post Street, 1410 Post Street, 1401 Gough Street, and 1407 Gough Street). These properties are within the Japantown Survey area, but were not identified as eligible for individual or historic district designation under a Japantown historic context. However, two of these properties (1400 Post Street and 1406-1408 Post Street) are identified in *Here Today*, an adopted local register of historical resources, and as such are considered individual historical resources under CEQA Guidelines Section 15064.5(a)(2). The remainder of these properties are considered “Category B-Properties Requiring Further Consultation and Review.”³¹ For the purposes of this evaluation of

²⁹ Patricia L. Parker and Thomas F. King, National Register Bulletin 38: Guidelines for Evaluating and Documenting Traditional Cultural Properties, 1990; Revised 1992, 1998.
<http://www.nps.gov/nr/publications/bulletins/nrb38/> accessed April 19, 2013.

³⁰ Pub. Res. Code Section 5024.1, Title 14 CCR, Section 4852.

³¹ Ibid.

potential project impacts on historical resources, these Category B properties are assumed to be eligible for inclusion in the CRHR and therefore considered historical resources under CEQA Guidelines Section 15064.5(a)(3).

The proposed project would have no direct physical impact on these off-site Victorian era row houses, either individually or collectively as a potential historic district. The proposed project could have an indirect impact on these resources by altering their existing visual setting. However, the integrity and significance of these resources is not premised on their possessing an intact visual setting or a cohesive visual relationship with their surroundings. Rather, the visual setting of these resources has been transformed by nearby development constructed within the past 50 years, including 1333 Gough Street on the project site (built in 1965), the Carlisle Senior Living Center at 1450 Post Street (built in 1992), and the Post International complex at 1388 Gough Street (built in 1993). In addition, visual interaction between these historical resources and the proposed new residential tower construction would be mediated by distance (separated by over 200 feet), and by the scale of the existing 1333 Gough Street building on the project site, which intervenes between the row houses and the proposed new residential tower under the proposed project. The proposed project is, therefore, not a project that “demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by the lead agency for purposes of CEQA” (CEQA Guidelines Section 15064.5(b)(2)(C)).

The project site is not within or adjacent to any historic district considered under a Mid-Century Modernist historic context. Nearby notable Mid-Century Modernist structures are less than 50 years of age (Saint Mary’s Cathedral, built in 1971; The Sequoias, built in 1969; 66 Cleary Court Condominiums, built in 1963; Carillon Tower, built in 1964). Absent additional information provided to the City that these properties are significant, they are not considered historical resources under CEQA.³²

For these reasons, implementation of the proposed project would have no substantial effect on an historic architectural resource under CEQA. Therefore, this Initial Study considers the project’s impact on historic architectural resources to be less than significant. No mitigation measures are required.

³² Ibid.

Impact CP-2: Construction activities for the proposed project could cause a substantial adverse change in the significance of archaeological resources, if such resources are present within the project site. (*Less than Significant with Mitigation*)

An Archaeological Research Design and Treatment Plan (ARDTP) has been prepared for the project by an independent consultant; the results of this study are summarized below.³³

Prehistoric Archaeological Resources

A review of the archival record indicates that the project site is in a sensitive area for prehistoric archaeological resources. Several prehistoric sites have been recorded within San Francisco. CA-SFR-113, discovered near Fifth and Market Streets during the 1980s, appears to have been occupied between 100 B.C. and 100 A.D. In 2003, resources found at the old Emporium building at 835 Market Street represent an extension of the neighboring CA-SFR-113. A shell midden site within the block bounded by Market, Mission, Third, and Fourth Streets in 2003 was recorded as two sites, CA-SFR-147 and CA-SFR-155. CA-SFR-147 was dated to 2,000 years before the present and CA-SFR-155 was dated to approximately 1,750 years before the present. A deposit found near the intersection of Eighth and Howard Streets in 2002 (CA-SFR-136H) could be associated with a larger settlement or group of settlements in that area. Nearby, human remains found during excavation for the BART Civic Center Station (CA-SFR-28) were dated to approximately 2950 B.C.

According to the ARDTP, recent archaeological work reveals that numerous relatively intact prehistoric deposits may be scattered throughout San Francisco, and may be deep enough to have been spared when lands were excavated for development. For that reason, it is possible that prehistoric archaeological resources are present at the project site. If present, these resources could be eligible under Criterion 4 of the CRHR.³⁴

Historic Period Archaeological Resources

The Historic Period relates to the period in San Francisco of the first European explorers (1769) to the present. A review of the archival record indicates that subsurface cultural resources from the late 19th century may be present at the project site. Prior to 1860, the project area was not developed. Neighborhoods west of Van Ness Avenue in the Cathedral Hill/Western Addition area grew in the 1860s, and by 1869, most streets in those neighborhoods were lined with buildings. By the late 19th century, the project site was settled with two- and three-story residential dwellings, some of which were multi-family. The project site remained relatively

³³ Archeo-Tec, *Archaeological Research Design and Treatment Plan for the 1333 Gough Street at Post Project*, June 2006. Also, Archeo-Tec, *Addendum to the Archaeological Research Design and Treatment Plan for the 1333 Gough Street at Post Project*, February 2007.

³⁴ A resource meets Criterion 4 if it “has yielded, or may be likely to yield, information important to prehistory or history.” Generally, a resource shall be considered by the lead agency to be historically significant if it meets one or more of the criteria for listing on the CRHR.

intact in the 1906 earthquake and fire; most structures appear largely unchanged, but were used as boarding houses. The primary change on the project block between 1913 and 1950 was the conversion of the boarding houses to apartment or rooming houses. These buildings were demolished, and the existing structures on the project site were constructed in 1965.

The households within the project site in the late 19th century were generally middle class and mostly consisted of two-parent families with several children. Many of the household members were originally from regions of what is now Germany. Most of the households had servants, who came from the U.S., Europe, and Asia. Several of the families lived at the project site for at least 20 years. The people who lived within the project site included Abner and Margaret Doble (whose son invented the Doble Steam Car in the 1920s), Mary Prag (a Jewish settler and women's rights activist), and the German Consul Adolph Rosenthal.

According to the preliminary geotechnical investigation, the entire project site is likely underlain by approximately five feet of fill.³⁵ However, neither this construction nor prior topographic modification appears to have affected the project site enough to destroy or deeply bury potential resources. As such, there is a substantial likelihood that historic-era archaeological resources are present within the project site. If present beneath the project site, residential refuse and architecture could be eligible for the CRHR under Criterion 4, for their ability to address research questions relating to late 19th-century domestic life in San Francisco and to add to the existing body of comparable data recovered from similar sites in San Francisco.

Project Impacts and Mitigation

Construction of the proposed project would involve excavation of up to about 45 feet below the ground surface. There is a substantial probability that significant archaeological features may be present within the project site. Unless mitigated, ground-disturbing construction activity within the project site, particularly within previously undisturbed soils, could adversely affect the significance of archaeological resources under CRHR Criterion 4 (Information Potential) by impairing the ability of such resources to convey important scientific and historical information. This effect would be considered a substantial adverse change in the significance of an historical resource and would therefore be a significant impact under CEQA.

Mitigation Measure M-CP-2: Archaeological Testing, Monitoring, Data Recovery and Reporting, calls for a qualified archaeological consultant to prepare and submit a plan for pre-construction archaeological testing, construction monitoring, and data recovery for approval by the San Francisco Environmental Review Officer (ERO). With implementation of Mitigation Measure M-CP-2, the proposed project would not cause a substantial adverse change to the significance of

³⁵ Treadwell & Rollo, *Preliminary Geotechnical Evaluation, 1333 Gough Street, San Francisco, California*, December 12, 2006. This report is on file with the San Francisco Planning Department, 1650 Mission Street, Suite 400, and is available for public review as part of Case File No. 2005.0679E.

an archaeological resource, if present within the project site. Therefore, this impact would be less than significant with mitigation.

Mitigation Measure M-CP-2: Archaeological Testing, Monitoring, Data Recovery and Reporting

Based on a reasonable presumption that archaeological resources may be present within the project site, 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 archaeological consultant from the pool of qualified archaeological consultants maintained by the Planning Department archaeologist. The archaeological consultant shall undertake an archaeological testing program as specified herein. In addition, the consultant shall be available to conduct an archaeological monitoring and/or data recovery program if required pursuant to this measure. The archaeological consultant's work shall be conducted in accordance with this measure and with the requirements of the project archaeological research design and treatment plan (*Archeo-Tec, Archaeological Research Design and Treatment Plan for the 1333 Gough Street at Post Project*, June 2007) at the direction of the Environmental Review Officer (ERO). In instances of inconsistency between the requirement of the project archaeological research design and treatment plan and of this archaeological mitigation measure, the requirements of this archaeological mitigation measure shall prevail. 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. Archaeological 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 archaeological resource as defined in CEQA Guidelines Sect. 15064.5 (a) and (c).

Consultation with Descendant Communities

On discovery of an archaeological site³⁶ associated with descendant Native Americans or the Overseas Chinese an appropriate representative³⁷ of the descendant group and the ERO shall be contacted. The representative of the descendant group shall be given the opportunity to monitor archaeological field investigations of the site and to consult with ERO regarding appropriate archaeological treatment of the site, of recovered data from the site, and, if applicable, any interpretative treatment of the associated archaeological site. A copy of the Final Archaeological Resources Report shall be provided to the representative of the descendant group.

Archaeological Testing Program

The archaeological consultant shall prepare and submit to the ERO for review and approval an archaeological testing plan (ATP). The archaeological testing program shall be conducted in accordance with the approved ATP. The ATP shall identify the property types of the expected archaeological resource(s) that potentially could be adversely affected by the proposed

³⁶ The term "archaeological site" is intended here to minimally include any archaeological deposit, feature, burial, or evidence of burial.

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.

project, the testing method to be used, and the locations recommended for testing. The purpose of the archaeological testing program will be to determine to the extent possible the presence or absence of archaeological resources and to identify and to evaluate whether any archaeological resource encountered on the site constitutes an historical resource under CEQA.

At the completion of the archaeological testing program, the archaeological consultant shall submit a written report of the findings to the ERO. If based on the archaeological testing program the archaeological consultant finds that significant archaeological resources may be present, the ERO in consultation with the archaeological consultant shall determine if additional measures are warranted. Additional measures that may be undertaken include additional archaeological testing, archaeological monitoring, and/or an archaeological data recovery program. If the ERO determines that a significant archaeological 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 archaeological resource; or
- B) A data recovery program shall be implemented, unless the ERO determines that the archaeological resource is of greater interpretive than research significance and that interpretive use of the resource is feasible.

Archaeological Monitoring Program

If the ERO in consultation with the archaeological consultant determines that an archaeological monitoring program (AMP) shall be implemented the archaeological monitoring program shall minimally include the following provisions:

- The archaeological 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 archaeological consultant shall determine what project activities shall be archaeologically monitored. In most cases, any soils-disturbing activities, such as demolition, foundation removal, excavation, grading, utilities installation, foundation work, driving of piles (foundation, shoring, etc.), site remediation, etc., shall require archaeological monitoring because of the risk these activities pose to potential archaeological resources and to their depositional context;
- The archaeological 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 archaeological resource;
- The archaeological monitor(s) shall be present on the project site according to a schedule agreed upon by the archaeological consultant and the ERO until the ERO has, in consultation with project archaeological consultant, determined that project construction activities could have no effects on significant archaeological deposits;
- The archaeological monitor shall record and be authorized to collect soil samples and artifactual/ecofactual material as warranted for analysis;
- If an intact archaeological deposit is encountered, all soils-disturbing activities in the vicinity of the deposit shall cease. The archaeological monitor shall be empowered to temporarily redirect demolition/excavation/pile driving/construction activities and equipment until the deposit is evaluated. If in the case of pile driving activity (foundation, shoring, etc.), the archaeological monitor has cause to believe that the

pile driving activity may affect an archaeological resource, the pile driving activity shall be terminated until an appropriate evaluation of the resource has been made in consultation with the ERO. The archaeological consultant shall immediately notify the ERO of the encountered archaeological deposit. The archaeological consultant shall make a reasonable effort to assess the identity, integrity, and significance of the encountered archaeological deposit, and present the findings of this assessment to the ERO.

Whether or not significant archaeological resources are encountered, the archaeological consultant shall submit a written report of the findings of the monitoring program to the ERO.

Archaeological Data Recovery Program

If the ERO, in consultation with the archaeological consultant, determines that archaeological data recovery programs shall be implemented, the archaeological data recovery program shall be conducted in accord with an archaeological data recovery plan (ADRP). The archaeological consultant, project sponsor, and ERO shall meet and consult on the scope of the ADRP prior to preparation of a draft ADRP. The archaeological 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 archaeological 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 archaeological resources if nondestructive methods are practical.

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 archaeological data recovery program.
- *Security Measures.* Recommended security measures to protect the archaeological resource from vandalism, looting, and non-intentionally damaging activities.
- *Final Report.* Description of proposed report format and distribution of results.
- *Curation.* Description of the procedures and recommendations for the curation of any recovered data having potential research value, identification of appropriate curation facilities, and a summary of the accession policies of the curation facilities.

Human Remains and Associated or Unassociated Funerary Objects

The treatment of human remains and of associated or unassociated funerary objects discovered during any soils disturbing activity shall comply with applicable State and Federal laws. This shall include immediate notification of the Coroner of the City and County of San Francisco and in the event of the Coroner's determination that the human remains are Native American remains, notification of the California State Native American Heritage Commission (NAHC)

who shall appoint a Most Likely Descendant (MLD) (Pub. Res. Code Sec. 5097.98). The archaeological consultant, project sponsor, and MLD shall make all reasonable efforts to develop an agreement for the treatment of, with appropriate dignity, human remains and associated or unassociated funerary objects (CEQA Guidelines, Sec. 15064.5(d)). The agreement should take into consideration the appropriate excavation, removal, recordation, analysis, custodianship, curation, and final disposition of the human remains and associated or unassociated funerary objects.

Final Archaeological Resources Report

The archaeological consultant shall submit a Draft Final Archaeological Resources Report (FARR) to the ERO that evaluates the historical significance of any discovered archaeological resource and describes the archaeological and historical research methods employed in the archaeological testing/monitoring/data recovery program(s) undertaken. Information that may put at risk any archaeological 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 Archaeological Site Survey Northwest Information Center (NWIC) shall receive one (1) copy and the ERO shall receive a copy of the transmittal of the FARR to the NWIC. The Environmental Planning division of the Planning Department shall receive one bound, one unbound and one unlocked, searchable PDF copy on CD of the FARR along with copies of any formal site recordation forms (CA DPR 523 series) and/or documentation for nomination to the National Register of Historic Places/California Register of Historical Resources. In instances of high public interest 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.

With implementation of Mitigation Measure M-CP-2, implementation of the proposed project would not cause a substantial adverse effect related to potential archaeological resources and unanticipated human remains. Therefore, this impact would be less than significant with mitigation.

Impact CP-3: Construction activities of the proposed project could affect unique geologic features or unique paleontological resources, if present within the project site. (*Less than Significant with Mitigation*)

The project site does not contain any known unique geological features. The project would involve excavation into the underlying Franciscan Formation bedrock. Given that the sedimentary Franciscan Complex has yielded significant vertebrate fossils within the San Francisco Bay Area, unique paleontological resources could potentially exist in the Franciscan Formation bedrock that underlies the project area. If such resources are present within the project site, construction activities could disturb paleontological resources and impair the ability of paleontological resources to yield important scientific information. Unless mitigated, such an impact would be considered a significant impact under CEQA.

Mitigation Measure M-CP-3: Paleontological Resources Monitoring and Mitigation Program, shown below, calls for a qualified paleontologist to implement an approved Paleontological Resources Monitoring and Mitigation Program (PRMMP). Implementation of the approved plan

for monitoring, recovery, identification, and curation under Mitigation Measure M-CP-3 would ensure that the scientific significance of the resource under CRHR Criterion 4 (Information Potential) would be preserved and/or realized. With implementation of Mitigation Measure M-CP-3, project construction would not cause a substantial adverse change to the scientific significance of a paleontological resource. Therefore, this impact would be less than significant with mitigation.

Mitigation Measure M-CP-3: Paleontological Resources Monitoring and Mitigation Program

The project sponsor shall retain the services of a qualified paleontological consultant having expertise in California paleontology to design and implement a Paleontological Resources Monitoring and Mitigation Program. The PRMMP shall include a description of when and where construction monitoring would be required; emergency discovery procedures; sampling and data recovery procedures; procedure for the preparation, identification, analysis, and curation of fossil specimens and data recovered; preconstruction coordination procedures; and procedures for reporting the results of the monitoring program.

The PRMMP shall be consistent with the Society for Vertebrate Paleontology Standard Guidelines for the mitigation of construction-related adverse impacts to paleontological resources and the requirements of the designated repository for any fossils collected. During construction, earth-moving activities shall be monitored by a qualified paleontological consultant having expertise in California paleontology in the areas where these activities have the potential to disturb previously undisturbed native sediment or sedimentary rocks. Monitoring need not be conducted in areas where the ground has been previously disturbed, in areas of artificial fill, in areas underlain by nonsedimentary rocks, or in areas where exposed sediment would be buried, but otherwise undisturbed.

The consultant's work shall be conducted in accordance with this measure and at the direction of the City's ERO. Plans and reports prepared by the consultant 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. Paleontological monitoring and/or data recovery programs required by this measure could suspend construction of the proposed project for as short a duration as reasonably possible and in no event for more than 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 potential effects on a significant paleontological resource as previously defined to a less-than-significant level.

Impact CP-4: The proposed project's construction activities could adversely affect human remains, if such remains are present within the project site. (*Less than Significant with Mitigation*)

Mitigation Measure M-CP-2: Archaeological Testing, Monitoring, Data Recovery and Reporting, calls for compliance with applicable state and federal laws regarding the treatment of human remains and of associated or unassociated funerary objects discovered during any soils-disturbing activity. This shall include immediate notification of the Coroner of the City and County of San Francisco and, in the event of the Coroner's determination that the human remains are Native American remains, notification of the Native American Heritage Commission, who would appoint a Most Likely Descendant (MLD) (Public Resources Code Section 5097.98). The

archaeological consultant, project sponsors, and MLD would make reasonable efforts to develop an agreement for the treatment of, with appropriate dignity, human remains and associated or unassociated funerary objects (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.

With implementation of Mitigation Measure M-CP-2, project construction would not cause a substantial adverse change to the scientific significance of an archaeological resource resulting from the disturbance of human remains. Therefore, this impact would be less than significant with mitigation.

Cumulative Impacts

Impact C-CP-1: The proposed project, in combination with past, present, and reasonably foreseeable future projects in the vicinity, would not result in a cumulatively considerable contribution to significant cumulative impacts on cultural resources. (*Less than Significant with Mitigation*)

The proposed project would not have any impact on an historic architectural resource and therefore would not contribute to any cumulative impact on historic architectural resources that could result from past, present, or reasonably foreseeable future projects in the vicinity of the project site.

The significance of impacts on archaeological and paleontological resources is premised on the potential loss of historic and scientific information. When considered with other past and proposed projects within San Francisco and the Bay Area region, the potential disturbance of archaeological and paleontological resources within the project site could make a cumulatively considerable contribution to a loss of significant historic and scientific information about California, Bay Area, and San Francisco history and prehistory. As discussed above, implementation of the approved plans for testing, monitoring, and data recovery would preserve and realize the information potential of archaeological and paleontological resources. The recovery, documentation, and interpretation of information about archaeological and paleontological resources that may be encountered within the project site would enhance knowledge of prehistory and history. This information would be available to future archaeological and paleontological studies, contributing to the collective body of scientific and historic knowledge. With implementation of Mitigation Measure M-CP-2: Archaeological Testing, Monitoring, Data Recovery and Reporting and Mitigation Measure M-CP-3: Paleontological Resources Monitoring and Mitigation Program, the proposed project's contribution to cumulative impacts, if any, would not be cumulatively considerable. Therefore, this impact would be less than significant.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
5. 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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Result in a change in air traffic patterns, including either an increase in traffic levels, obstructions to flight, or a change in location, that results in substantial safety risks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Result in inadequate emergency access?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

The project site is not located within an airport land use plan area or in the vicinity of a private airstrip. Therefore, topic 5c is not applicable to the proposed project.

Construction and operation of the proposed project would increase auto, transit, pedestrian and bicycle trips to and from the project site and would modify existing access and egress points to the project site. The proposed project has the potential to result in unacceptable levels of service at local intersections, could increase transportation hazards, and could conflict with adopted policies related to transit, bicycle, or pedestrian facilities. The potential project-generated and cumulative transportation impacts will be discussed in the EIR, based on the results of a Transportation Impact Study.

Impact TR-1: The proposed project could result in unacceptable levels of service at local intersections, which would conflict with an established measure of effectiveness of performance of the circulation system; could increase transportation hazards due to a design feature; could result in inadequate emergency access to the project site; or could conflict with adopted policies related to transit, bicycle, or pedestrian facilities. (Potentially Significant)

A transportation impact study will be prepared for the proposed project and summarized in the EIR. The study will examine existing conditions and assess the proposed project's net-new daily and PM peak hour trips and their impacts on intersection operations, transit, passenger loading operations, circulation, large-truck equipment loading operations, bicycle and pedestrian safety, emergency vehicle access, and parking.

Cumulative Impacts

Impact C-TR-1: The proposed project, in combination with past, present and reasonably foreseeable future projects in the site vicinity, could result in a cumulatively considerable contribution to a significant transportation and circulation impact. (Potentially Significant)

The transportation impact study will evaluate the project's contribution of net-new trips in conjunction with those projected to occur from reasonably foreseeable projects and background growth anticipated within both the neighborhood and citywide context. Combined, the data will then be used to determine impacts on intersection operations, transit, passenger loading operations, circulation, large-truck equipment loading operations, bicycle and pedestrian safety, emergency vehicle access, and parking.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
6. 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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Be substantially affected by existing noise levels?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

The project site is not located within the vicinity of a private airstrip, within an airport land use plan area, or within two miles of any nearby public airports or public use airports that have not adopted land use plans. Thus, topics 6e and 6f are not applicable to the proposed project.

Construction and operation of the proposed project could expose persons to excessive noise and vibration resulting from construction and operation of the proposed project. It would also place additional persons on the project site that could be affected by noise in the vicinity of the project site. The potential project-generated and cumulative transportation impacts will be discussed in the EIR, based on the results of a noise study.

Impact NO-1: The proposed project could expose persons to excessive noise and vibration, could result in temporary and permanent increases in ambient noise levels, and could be substantially affected by existing noise levels in the project vicinity. (*Potentially Significant*)

A background noise and vibration impact analysis report for the proposed project will be prepared and summarized in the Draft EIR. The background noise study will describe existing noise conditions, discuss noise standards and ordinances applicable to the proposed project, and analyze potential noise impacts of the proposed project resulting from project construction on nearby land uses and sensitive receptors. The background noise study will analyze street traffic-related noise, and noise associated with building functions such as mechanical systems and loading activities.

Cumulative Impacts

Impact C-NO-1: The proposed project, in combination with past, present and reasonably foreseeable future projects in the site vicinity, could result in a cumulatively considerable contribution to a significant cumulative noise impact. (*Potentially Significant*)

The EIR will also include an analysis of the potential cumulative noise impacts of the proposed project in combination with foreseeable future projects in the vicinity. It will include a review of construction noise and indicate whether there is known potential for overlapping construction

with other nearby projects and whether the project's operational noise effects could be significant in light of other foreseeable projects within the vicinity.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
7. AIR QUALITY—Would the project:					
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Expose sensitive receptors to substantial pollutant concentrations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Impact AQ-1: The proposed project could conflict with implementation of an applicable air quality plan, could violate air quality standards or contribute to an existing or projected air quality violation, could result in a cumulatively considerable increase in a criteria pollutant, or could expose sensitive receptors to substantial pollutant concentrations. (*Potentially Significant*)

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 and the California Clean Air Act, 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.

In accordance with the state and federal clean air acts, air pollutant standards are identified for the following six criteria air pollutants: ozone, carbon monoxide (CO), particulate matter (PM), nitrogen dioxide (NO₂), sulfur dioxide (SO₂), 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. Land use projects may contribute to regional criteria air pollutants during the construction and operational phases of a project. The BAAQMD has adopted significance thresholds for criteria pollutants, in its *California Environmental Quality*

Act Air Quality Guidelines.³⁸ The BAAQMD has also established screening criteria for criteria pollutants; if a project meets these screening criteria, it would not exceed the adopted thresholds.³⁹

The proposed project would include 262 new residential units. This number of units is below the operational criteria pollutant screening size, which for a high-rise condominium project is 511 dwelling units. However, the construction-related screening size for a high-rise condominium project is 240 dwelling units. The proposed project does not meet this screening criterion. Therefore, a quantitative analysis of criteria pollutant emissions will be prepared, to include both construction and operational emissions. This analysis will provide the basis for making a determination as to whether construction or operation of the proposed project would result in exceedances of the adopted air quality thresholds and assist in determining whether the proposed project would cause any significant air quality impacts, such as conflicting with implementation of an applicable air quality plan, violate any air quality standards, or expose sensitive receptors to substantial pollutant concentrations, or result in a cumulatively considerable increase in a criteria pollutant. These air quality issues will be discussed in the EIR.

Impact AQ-2: 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. Observation indicates that the project site is not substantially affected by sources of odors. The proposed 1481 Post Street building primarily includes residential uses but would also contain a café and a fitness amenity with a swimming pool. The proposed project also includes construction of a new addition to 1333 Gough Street that would house a new swimming pool for the fitness center in 1333 Gough Street. While the café and swimming pools could be odor sources, they would not be large or major sources and any odors would be localized. In addition, the swimming pools would be indoors, reducing any odor potential to a less-than significant level. 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. Therefore, the proposed project would not create significant sources of new odors and odor impacts would be less than significant.

³⁸ Bay Area Air Quality Management District (BAAQMD), *California Environmental Quality Act Air Quality Guidelines*, May 2011, p. 2-2, Table 2-1.

³⁹ *Ibid.*, p. 3-1.

Cumulative Impacts

Impact C-AQ-1: The proposed project, in combination with past, present, and reasonably foreseeable future projects in the site vicinity, would not result in a cumulatively considerable contribution to a significant cumulative impact related to odors. (*Less than Significant*)

Odor impacts of the proposed project would be localized, as would those of existing surrounding land uses and foreseeable future projects. They would not combine to result in a significant cumulative impact related to odors. As discussed above under Impact AQ-2, the proposed project would not create significant sources of new odors. Likewise, the proposed project would not make a cumulatively considerable contribution to any potential cumulative impact related to odors.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
8. GREENHOUSE GAS EMISSIONS— Would the project:					
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

ENVIRONMENTAL SETTING

Gases that trap heat in the atmosphere are referred to as greenhouse gases (GHGs) because they capture heat radiated from the sun as it is reflected back into the atmosphere, much like a greenhouse does. The accumulation of GHGs has been implicated as the driving force for global climate change. The primary GHGs are carbon dioxide, methane, nitrous oxide, ozone, and water vapor.

Individual projects contribute to the cumulative effects of climate change by emitting GHGs during demolition, construction, and operational phases. While the presence of the primary GHGs in the atmosphere is naturally occurring, carbon dioxide (CO₂), methane (CH₄), and nitrous oxide (N₂O) are largely emitted from human activities, accelerating the rate at which these compounds occur within earth's atmosphere. Emissions of carbon dioxide are largely by-products of fossil fuel combustion, whereas methane results from off-gassing associated with agricultural practices and landfills. Black carbon has recently emerged as a major contributor to global climate change, possibly second only to CO₂. Black carbon is produced naturally and by

human activities as a result of the incomplete combustion of fossil fuels, biofuels and biomass.⁴⁰ N₂O is a byproduct of various industrial processes and has a number of uses, including use as an anesthetic and as an aerosol propellant. Other GHGs include hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride, and are generated in certain industrial processes. Greenhouse gases are typically reported in “carbon dioxide-equivalent” measures (CO₂E).⁴¹

There is international scientific consensus that human-caused increases in GHGs have and will continue to contribute to global warming. Many impacts resulting from climate change, including increased fires, floods, severe storms and heat waves, are occurring already and will only become more frequent and more costly.⁴² Secondary effects of climate change are likely to include a global rise in sea level, impacts to agriculture, the state’s electricity system, and native freshwater fish ecosystems, an increase in the vulnerability of levees in the Sacramento-San Joaquin Delta, changes in disease vectors, and changes in habitat and biodiversity.^{43,44}

The California Air Resources Board (ARB) estimated that in 2009 California produced about 457 million gross metric tons of CO₂E (MMTCO₂E).⁴⁵ The ARB found that transportation is the source of 38 percent of the State’s GHG emissions, followed by electricity generation (both in-state generation and imported electricity) at 23 percent and industrial sources at 18 percent. Commercial and residential fuel use (primarily for heating) accounted for nine percent of GHG emissions.⁴⁶ In the Bay Area, the transportation (on-road motor vehicles, off-highway mobile sources, and aircraft) and industrial/commercial sectors were the two largest sources of GHG emissions, each accounting for approximately 36 percent of the Bay Area’s 95.8 MMTCO₂E emitted in 2007.⁴⁷ Electricity generation accounts for approximately 16 percent of the Bay

⁴⁰ Center for Climate and Energy Solutions, *What is Black Carbon?*, April 2010. Available online at <http://www.c2es.org/docUploads/what-is-black-carbon.pdf>. Accessed September 27, 2012.

⁴¹ 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.

⁴² California Climate Change Portal. Available online at <http://www.climatechange.ca.gov>. Accessed September 25, 2012.

⁴³ California Climate Change Portal. Available online at <http://www.climatechange.ca.gov/>. Accessed September 25, 2012.

⁴⁴ California Energy Commission, California Climate Change Center, *Our Changing Climate 2012*. Available online at <http://www.energy.ca.gov/2012publications/CEC-500-2012-007/CEC-500-2012-007.pdf>. Accessed August 21, 2012.

⁴⁵ California Air Resources Board (ARB), *California Greenhouse Gas Inventory for 2000-2009 – by Category as Defined in the Scoping Plan*. Available online at http://www.arb.ca.gov/cc/inventory/data/tables/ghg_inventory_scopingplan_00-09_2011-10-26.pdf. Accessed August 21, 2012.

⁴⁶ ARB, *California Greenhouse Gas Inventory for 2000-2009 – by Category as Defined in the Scoping Plan*. Available online at http://www.arb.ca.gov/cc/inventory/data/tables/ghg_inventory_scopingplan_00-09_2011-10-26.pdf. Accessed August 21, 2012.

⁴⁷ Bay Area Air Quality Management District (BAAQMD), *Source Inventory of Bay Area Greenhouse Gas Emissions: Base Year 2007, Updated: February 2010*. Available online at http://www.baaqmd.gov/~media/Files/Planning%20and%20Research/Emission%20Inventory/regionalinventory2007_2_10.ashx. Accessed August 21, 2012.

Area's GHG emissions followed by residential fuel usage at 7 percent, off-road equipment at 3 percent and agriculture at 1 percent.⁴⁸

REGULATORY SETTING

In 2005, in recognition of California's vulnerability to the effects of climate change, then-Governor Schwarzenegger established Executive Order S-3-05, which sets forth a series of target dates by which statewide emissions of GHGs would be progressively reduced, as follows: by 2010, reduce GHG emissions to 2000 levels (approximately 457 MMTCO₂E); by 2020, reduce emissions to 1990 levels (estimated at 427 MMTCO₂E); and by 2050 reduce statewide GHG emissions to 80 percent below 1990 levels (approximately 85 MMTCO₂E).

In response, the California legislature passed Assembly Bill No. 32 in 2006 (California Health and Safety Code Division 25.5, Sections 38500, et seq., or AB 32), also known as the Global Warming Solutions Act. AB 32 requires ARB to design and implement emission limits, regulations, and other measures, such that feasible and cost-effective statewide GHG emissions are reduced to 1990 levels by 2020 (representing a 25 percent reduction from forecast emission levels).⁴⁹

Pursuant to AB 32, ARB adopted a Scoping Plan in December 2008, outlining measures to meet the 2020 GHG reduction limits. The Scoping Plan is the State's overarching plan for addressing climate change. In order to meet these goals, California must reduce its GHG emissions by 30 percent below projected 2020 business as usual emissions levels, or about 15 percent from 2008 levels.⁵⁰ The Scoping Plan estimates a reduction of 174 million metric tons of CO₂E (MMTCO₂E) (about 191 million U.S. tons) from the transportation, energy, agriculture, forestry, and high global warming potential sectors. See Table 3: GHG Reductions from the AB 32 Scoping Plan Sectors. ARB has identified an implementation timeline for the GHG reduction strategies in the Scoping Plan.⁵¹

⁴⁸ BAAQMD, *Source Inventory of Bay Area Greenhouse Gas Emissions: Base Year 2007, Updated: February 2010*. Available online at http://www.baaqmd.gov/~media/Files/Planning%20and%20Research/Emission%20Inventory/regionalinventory2007_2_10.ashx. Accessed August 21, 2012.

⁴⁹ Governor's Office of Planning and Research (OPR), *Technical Advisory- CEQA and Climate Change: Addressing Climate Change through California Environmental Quality Act (CEQA) Review*, June 19, 2008. Available online at <http://opr.ca.gov/docs/june08-ceqa.pdf>. Accessed August 21, 2012.

⁵⁰ ARB, *California's Climate Plan: Fact Sheet*. Available online at http://www.arb.ca.gov/cc/facts/scoping_plan_fs.pdf. Accessed August 21, 2012.

⁵¹ ARB, *Assembly Bill 32: Global Warming Solutions Act*. Available online at <http://www.arb.ca.gov/cc/ab32/ab32.htm/>. Accessed August 21, 2012.

Table 3: GHG Reductions from the AB 32 Scoping Plan Sectors^{52,53}

GHG Reduction Measures By Sector	GHG Reductions (MMT CO₂E)
Transportation Sector	62.3
Electricity and Natural Gas	49.7
Industry	1.4
Landfill Methane Control Measure (Discrete Early Action)	1
Forestry	5
High Global Warming Potential GHGs	20.2
Additional Reductions Needed to Achieve the GHG Cap	34.4
Total	174
Other Recommended Measures	
Government Operations	1-2
Methane Capture at Large Dairies	1
Additional GHG Reduction Measures:	
Water	4.8
Green Buildings	26
High Recycling/ Zero Waste	9
• Commercial Recycling	
• Composting	
• Anaerobic Digestion	
• Extended Producer Responsibility	
• Environmentally Preferable Purchasing	
Total	41.8-42.8

The AB 32 Scoping Plan recommendations are intended to curb projected business-as-usual growth in GHG emissions and reduce those emissions to 1990 levels. Therefore, meeting AB 32 GHG reduction goals would result in an overall annual net decrease in GHGs as compared to current levels and accounts for projected increases in emissions resulting from anticipated growth.

The Scoping Plan also relies on the requirements of Senate Bill 375 (SB 375) to implement the carbon emission reductions anticipated from land use decisions. SB 375 was enacted to align local land use and transportation planning to further achieve the State's GHG reduction goals. SB 375 requires regional transportation plans, developed by Metropolitan Planning Organizations (MPOs), to incorporate a "sustainable communities strategy" in their regional transportation plans (RTPs) that would achieve GHG emission reduction targets set by ARB. SB 375 also includes provisions for streamlined CEQA review for some infill projects such as transit-oriented

⁵² ARB, *Climate Change Scoping Plan*, December 2008. Available online at http://www.arb.ca.gov/cc/scopingplan/document/adopted_scoping_plan.pdf. Accessed August 21, 2012.

⁵³ ARB, *California's Climate Plan: Fact Sheet*. Available online at http://www.arb.ca.gov/cc/facts/scoping_plan_fs.pdf. Accessed August 21, 2012.

development. SB 375 would be implemented over the next several years and the Bay Area Metropolitan Transportation Commission's 2013 RTP, Plan Bay Area, would be its first plan subject to SB 375.

AB 32 further anticipates that local government actions will result in reduced GHG emissions. ARB has identified a GHG reduction target of 15 percent from current levels for local governments themselves and noted that successful implementation of the Scoping Plan relies on local governments' land use planning and urban growth decisions because local governments have the primary authority to plan, zone, approve, and permit land development to accommodate population growth and the changing needs of their jurisdictions.⁵⁴ The BAAQMD has conducted an analysis of the effectiveness of the region in meeting AB 32 goals from the actions outlined in the Scoping Plan and determined that in order for the Bay Area to meet AB 32 GHG reduction goals, the Bay Area would need to achieve an additional 2.3 percent reduction in GHG emissions from the land use driven sector.⁵⁵

Senate Bill 97 (SB 97) required the Office of Planning and Research (OPR) to amend the state CEQA guidelines to address the feasible mitigation of GHG emissions or the effects of GHGs. In response, OPR amended the CEQA Guidelines to provide guidance for analyzing GHG emissions. Among other changes to the CEQA Guidelines, the amendments added a new section to the CEQA Checklist (CEQA Guidelines Appendix G) to address questions regarding the project's potential to emit GHGs.

The Bay Area Air Quality Management District (BAAQMD) is the primary agency responsible for air quality regulation in the nine-county San Francisco Bay Area Air Basin (SFBAAB). The BAAQMD recommends that local agencies adopt a Greenhouse Gas Reduction Strategy consistent with AB 32 goals and that subsequent projects be reviewed to determine the significance of their GHG emissions based on the degree to which that project complies with a Greenhouse Gas Reduction Strategy.⁵⁶ As described below, this recommendation is consistent with the approach to analyzing GHG emissions outlined in the CEQA Guidelines.

At a local level, the City has developed a number of plans and programs to reduce the City's contribution to global climate change. San Francisco's GHG reduction goals, as outlined in the 2008 Greenhouse Gas Reduction ordinance are as follows: by 2008, determine the City's GHG emissions for the year 1990, the baseline level with reference to which target reductions are set;

⁵⁴ ARB. *Climate Change Scoping Plan*, December 2008. Available online at http://www.arb.ca.gov/cc/scopingplan/document/adopted_scoping_plan.pdf. Accessed August 21, 2012.

⁵⁵ BAAQMD, *California Environmental Quality Act Guidelines Update, Proposed Thresholds of Significance*, December 2009. Available online at <http://www.baaqmd.gov/~media/Files/Planning%20and%20Research/CEQA/Proposed%20Thresholds%20of%20Significance%20Dec%207%202009.ashx>. Accessed September 25, 2012.

⁵⁶ BAAQMD, *California Environmental Quality Act Air Quality Guidelines*, May 2012. Available online at http://www.baaqmd.gov/~media/Files/Planning%20and%20Research/CEQA/BAAQMD%20CEQA%20Guidelines_Final_May%202012.ashx?la=en. Accessed September 25, 2012.

by 2017, reduce GHG emissions by 25 percent below 1990 levels; by 2025, reduce GHG emissions by 40 percent below 1990 levels; and finally by 2050, reduce GHG emissions by 80 percent below 1990 levels. San Francisco's Greenhouse Gas Reduction Strategy documents the City's actions to pursue cleaner energy, energy conservation, alternative transportation and solid waste policies. As identified in the Greenhouse Gas Reduction Strategy, the City has implemented a number of mandatory requirements and incentives that have measurably reduced GHG emissions including, but not limited to, increasing the energy efficiency of new and existing buildings, installation of solar panels on building roofs, implementation of a green building strategy, adoption of a zero waste strategy, a construction and demolition debris recovery ordinance, a solar energy generation subsidy, incorporation of alternative fuel vehicles in the City's transportation fleet (including buses), and a mandatory recycling and composting ordinance. The strategy also identifies 42 specific regulations for new development that would reduce a project's GHG emissions.

The Greenhouse Gas Reduction Strategy concludes that San Francisco's policies and programs have resulted in a reduction in GHG emissions below 1990 levels, exceeding statewide AB 32 GHG reduction goals. As reported, San Francisco's communitywide 1990 GHG emissions were approximately 6.15 MMTCO₂E. A recent third-party verification of the City's 2010 communitywide and municipal emissions inventory has confirmed that San Francisco has reduced its GHG emissions to 5.26 MMTCO₂E, representing a 14.5 percent reduction in GHG emissions below 1990 levels.^{57,58}

APPROACH TO ANALYSIS

In compliance with SB 97, OPR amended the CEQA Guidelines to address the feasible mitigation of GHG emissions or the effects of GHGs. Among other changes to the CEQA Guidelines, the amendments added a new section to the CEQA Checklist (CEQA Guidelines Appendix G) to address questions regarding the project's potential to emit GHGs. The potential for a project to result in significant GHG emissions which contribute to the cumulative effects of global climate change is based on the CEQA Guidelines and CEQA Checklist, as amended by SB 97, and is determined by an assessment of the project's compliance with local and state plans, policies and regulations adopted for the purpose of reducing the cumulative effects of climate change. GHG emissions are analyzed in the context of their contribution to the cumulative effects of climate change because a single land use project could not generate enough GHG emissions to noticeably

⁵⁷ ICF International, "Technical Review of the 2010 Community-wide GHG Inventory for City and County of San Francisco." Memorandum from ICF International to San Francisco Department of the Environment, April 10, 2012. Available online at <http://www.sfenvironment.org/download/community-greenhouse-gas-inventory-3rd-party-verification-memo>. Accessed September 27, 2012.

⁵⁸ ICF International, "Technical Review of San Francisco's 2010 Municipal GHG Inventory." Memorandum from ICF International to San Francisco Department of the Environment, May 8, 2012. Available online at <http://www.sfenvironment.org/download/third-party-verification-of-san-franciscos-2010-municipal-ghg-inventory>. Accessed September 27, 2012.

change the global average temperature. CEQA Guidelines Sections 15064.4 and 15183.5 address the analysis and determination of significant impacts from a proposed project's GHG emissions. 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 greenhouse gases and describes the required contents of such a plan. As discussed above, San Francisco has prepared its own Greenhouse Gas Reduction Strategy, demonstrating that San Francisco's policies and programs have collectively reduced communitywide GHG emissions to below 1990 levels, meeting GHG reduction goals outlined in AB 32. The City is also well on its way to meeting the long-term GHG reduction goal of reducing emissions 80 percent below 1990 levels by 2050. Chapter 1 of the City's *Strategies to Address Greenhouse Gas Emission* (the Greenhouse Gas Reduction Strategy) describes how the strategy meets the requirements of CEQA Guidelines Section 15183.5. The BAAQMD has reviewed San Francisco's Greenhouse Gas Reduction Strategy, concluding that "Aggressive GHG reduction targets and comprehensive strategies like San Francisco's help the Bay Area move toward reaching the State's AB 32 goals, and also serve as a model from which other communities can learn."⁵⁹

With respect to CEQA Guidelines Section 15064.4(b), the factors to be considered in making a significance determination include: 1) the extent to which GHG emissions would increase or decrease as a result of the proposed project; 2) whether or not a proposed project exceeds a threshold that the lead agency determines applies to the project; and finally 3) demonstrating compliance with plans and regulations adopted for the purpose of reducing or mitigating GHG emissions.

The GHG analysis provided below includes a qualitative assessment of GHG emissions that would result from a proposed project, including emissions from an increase in vehicle trips, natural gas combustion, and/or electricity use among other things. Consistent with the CEQA Guidelines and BAAQMD recommendations for analyzing GHG emissions, the significance standard applied to GHG emissions generated during project construction and operational phases is based on whether the project complies with a plan for the reduction of GHG emissions. The City's Greenhouse Gas Reduction Strategy is the City's overarching plan documenting the policies, programs and regulations that the City implements towards reducing municipal and communitywide GHG emissions. In particular, San Francisco implements 42 specific regulations that reduce GHG emissions which are applied to projects within the City. Projects that comply with the Greenhouse Gas Reduction Strategy would not result in a substantial increase in GHGs, since the City has shown that overall communitywide GHGs have decreased and that the City has met AB 32 GHG reduction targets. Individual project compliance with the City's Greenhouse Gas Reduction Strategy is demonstrated by completion of the Compliance Checklist for Greenhouse Gas Analysis.

⁵⁹ BAAQMD, *Letter from J. Roggenkamp, BAAQMD, to B. Wycko, San Francisco Planning Department*, October 28, 2010. Available online at http://www.sf-planning.org/ftp/files/MEA/GHG-Reduction_Letter.pdf. Accessed September 24, 2012.

In summary, the two applicable greenhouse gas reduction plans, the AB 32 Scoping Plan and the City's Greenhouse Gas Reduction Strategy, are intended to reduce GHG emissions below current levels. Given that the City's local greenhouse gas reduction targets are more aggressive than the State's 2020 GHG reduction targets and consistent with the long-term 2050 reduction targets, the City's Greenhouse Gas Reduction Strategy is consistent with the goals of AB 32. Therefore, proposed projects that are consistent with the City's Greenhouse Gas Reduction Strategy would be consistent with the goals of AB 32, would not conflict with either plan, and would therefore not exceed San Francisco's applicable GHG threshold of significance. Furthermore, a locally compliant project would not result in a substantial increase in GHGs.

The following analysis of the proposed project's impact on climate change focuses on the project's contribution to cumulatively significant GHG emissions. Given the analysis is in a cumulative context, this section does not include an individual project-specific impact statement.

Cumulative Impacts

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*)

The most common GHGs resulting from human activity associated with land use decisions are CO₂, black carbon, CH₄, and N₂O.⁶⁰ 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 landfill operations.

Implementation of the proposed project would consist of the demolition of the existing three-level parking structure and the common open space, tennis courts, and pool building (now closed) atop the parking structure. On the portion of the project site west of the 1333 Gough Street building, the project sponsor proposes to construct a 36-story residential building with 429,310 gsf and up to 262 residential units and below-grade parking. In addition to the residences, the proposed new building would include various residential amenities, such as a residential lobby, new fitness center amenity with a swimming pool, landscaped terraces and a residents' lounge. The new building would also include a 2,460-sq.-ft. café facing Post Street. These changes and intensified uses under the proposed project would result in additional vehicle trips and an increase in energy use. The increased activity on site would also be expected to result in an increase in overall water

⁶⁰ OPR, *Technical Advisory- CEQA and Climate Change: Addressing Climate Change through California Environmental Quality Act (CEQA) Review*, June 19, 2008. Available at the Office of Planning and Research's website at <http://www.opr.ca.gov/ceqapdfs/june08-ceqa.pdf>. Accessed March 3, 2010.

usage that generates indirect emissions from the energy required to pump, treat, and convey water. The demolition could also result in an increase in discarded landfill materials. Therefore, the proposed project would contribute to annual long-term increases in GHGs as a result of increased vehicle trips (mobile sources) and residential and commercial operations that result in an increase in energy use, water use and wastewater treatment, and solid waste disposal. Construction activities would also result in temporary increases in GHG emissions.

As discussed above and consistent with the state CEQA Guidelines and BAAQMD recommendations for analyzing GHG emissions under CEQA, projects that are consistent with San Francisco's *Strategies to Address Greenhouse Gas Emissions* would result in a less-than-significant GHG impact. Based on an assessment of the proposed project's compliance with San Francisco's *Strategies to Address Greenhouse Gas Emissions*, the proposed project would be required to comply with the numerous ordinances that reduce greenhouse gas emissions as shown in Table 4: Regulations Applicable to the Proposed Project.

Table 4: Regulations Applicable to the Proposed Project

Regulation	Requirements	Project Compliance	Discussion
Transportation Sector			
Commuter Benefits Ordinance (San Francisco Environment Code, Section 421)	<p>All employers of 20 or more employees must provide at least one of the following benefit programs:</p> <p>1. A Pre-Tax Election consistent with 26 U.S.C. § 132(f), allowing employees to elect to exclude from taxable wages and compensation, employee commuting costs incurred for transit passes or vanpool charges, or</p> <p>(2) Employer Paid Benefit whereby the employer supplies a transit pass for the public transit system requested by each Covered Employee or reimbursement for equivalent vanpool charges at least equal in value to the purchase price of the appropriate benefit, or</p> <p>(3) Employer Provided Transit furnished by the employer at no cost to the employee in a vanpool or bus, or similar multi-passenger vehicle operated by or for the employer.</p>	<p><input checked="" type="checkbox"/> Project Complies</p> <p><input type="checkbox"/> Not Applicable</p> <p><input type="checkbox"/> Project Does Not Comply</p>	End user employers occupying the building (e.g. ground-floor retail, Homeowner's Association [HOA], fitness center) would comply to the extent applicable and required.

(Table 4, continued)

Regulation	Requirements	Project Compliance	Discussion
Emergency Ride Home Program	All persons employed in San Francisco are eligible for the emergency ride home program.	<input checked="" type="checkbox"/> Project Complies <input type="checkbox"/> Not Applicable <input type="checkbox"/> Project Does Not Comply	End-user employers occupying the building (e.g. ground-floor retail, HOA, fitness center) would comply to the extent applicable and required.
Bicycle parking in Residential Buildings (San Francisco Planning Code, Section 155.5)	(A) For projects up to 50 dwelling units, one Class 1 space for every 2 dwelling units. (B) For projects over 50 dwelling units, 25 Class 1 spaces plus one Class 1 space for every 4 dwelling units over 50.	<input checked="" type="checkbox"/> Project Complies <input type="checkbox"/> Not Applicable <input type="checkbox"/> Project Does Not Comply	The proposed project would provide at least 78 Class I bicycle parking spaces as required by San Francisco Planning Code Section 155.5.
San Francisco Green Building Requirements (San Francisco Building Code, Chapter 13C.106.5 and 13C.5.106.5)	Requires New Large Commercial projects, New High-rise Residential projects and Commercial Interior projects to provide designated parking for low-emitting, fuel efficient, and carpool/van pool vehicles. Mark 8% of parking stalls for such vehicles.	<input checked="" type="checkbox"/> Project Complies <input type="checkbox"/> Not Applicable <input type="checkbox"/> Project Does Not Comply	The proposed project would comply with San Francisco Green Building Requirements for designated parking as applicable and required.
Car Sharing Requirements (San Francisco Planning Code, Section 166)	New residential projects or renovation of buildings being converted to residential uses within most of the City's mixed-use and transit-oriented residential districts are required to provide car share parking spaces.	<input checked="" type="checkbox"/> Project Complies <input type="checkbox"/> Not Applicable <input type="checkbox"/> Project Does Not Comply	The proposed project includes up to 262 dwelling units, and the proposed project would provide four residential car share space.
Energy Efficiency Sector			
San Francisco Green Building Requirements for Energy Efficiency (LEED EA3, San Francisco Building Code, Chapter 13C.5.410.2)	For New Large Commercial Buildings - Requires Enhanced Commissioning of Building Energy Systems For new large buildings greater than 10,000 square feet, commissioning shall be included in the design and construction to verify that the components meet the owner's or owner representative's project requirements.	<input checked="" type="checkbox"/> Project Complies <input type="checkbox"/> Not Applicable <input type="checkbox"/> Project Does Not Comply	The proposed project would comply with San Francisco Green Building Requirements for energy efficiency as applicable and required.
Commissioning of Building Energy Systems (LEED prerequisite, EA1)	Requires Fundamental Commissioning for New High-rise Residential, Commercial Interior, Commercial and Residential Alteration projects	<input checked="" type="checkbox"/> Project Complies <input type="checkbox"/> Not Applicable <input type="checkbox"/> Project Does Not Comply	The proposed project would comply with the LEED prerequisite for the fundamental commissioning of building energy systems.

(Table 4, continued)

Regulation	Requirements	Project Compliance	Discussion
San Francisco Green Building Requirements for Energy Efficiency (San Francisco Building Code, Chapter 13C)	Under the Green Point Rated system and in compliance with the Green Building Ordinance, all new residential buildings will be required to be at a minimum 15% more energy efficient than Title 24 energy efficiency requirements.	<input checked="" type="checkbox"/> Project Complies <input type="checkbox"/> Not Applicable <input type="checkbox"/> Project Does Not Comply	The proposed project would comply with the San Francisco Green Building Requirements, and at a minimum would be 15% more energy efficient than Title 24 energy efficiency requirements.
San Francisco Green Building Requirements for Stormwater Management (San Francisco Building Code, Chapter 13C) or San Francisco Stormwater Management Ordinance (Public Works Code Article 4.2)	Requires all new development or redevelopment disturbing more than 5,000 square feet of ground surface to manage stormwater on-site using low impact design. Projects subject to the Green Building Ordinance Requirements must comply with either LEED® Sustainable Sites Credits 6.1 and 6.2, or with the City's Stormwater Management Ordinance and stormwater design guidelines.	<input checked="" type="checkbox"/> Project Complies <input type="checkbox"/> Not Applicable <input type="checkbox"/> Project Does Not Comply	The proposed project is subject to the San Francisco Green Building Requirements. Therefore, the proposed project would comply with requirements for stormwater management as applicable and required.
Indoor Water Efficiency (San Francisco Building Code, Chapter 13C sections 13C.5.103.1.2, 13C.4.103.2.2, 13C.303.2.)	<p>If meeting a LEED Standard; Reduce overall use of potable water within the building by a specified percentage – for showerheads, lavatories, kitchen faucets, wash fountains, water closets and urinals.</p> <p>New large commercial and New high rise residential buildings must achieve a 30% reduction.</p> <p>Commercial interior, commercial alteration and residential alteration should achieve a 20% reduction below UPC/IPC 2006, et al.</p> <p>If meeting a GreenPoint Rated Standard: Reduce overall use of potable water within the building by 20% for showerheads, lavatories, kitchen faucets, wash fountains, water closets and urinals.</p>	<input checked="" type="checkbox"/> Project Complies <input type="checkbox"/> Not Applicable <input type="checkbox"/> Project Does Not Comply	The proposed project would comply with San Francisco Green Building Requirements for indoor water efficiency as applicable and required.

(Table 4, continued)

Regulation	Requirements	Project Compliance	Discussion
San Francisco Water Efficient Irrigation Ordinance	<p>Projects that include 1,000 square feet (sf) or more of new or modified landscape are subject to this ordinance, which requires that landscape projects be installed, constructed, operated, and maintained in accordance with rules adopted by the SFPUC that establish a water budget for outdoor water consumption.</p> <p>Tier 1: 1,000 sf \leq project landscape < 2,500 sf</p> <p>Tier 2: Project landscape area is greater than or equal to 2,500 sf. Note; Tier 2 compliance requires the services of landscape professionals.</p> <p>See the SFPUC Web site for information regarding exemptions to this requirement.</p> <p>www.sfwater.org/landscape</p>	<input checked="" type="checkbox"/> Project Complies <input type="checkbox"/> Not Applicable <input type="checkbox"/> Project Does Not Comply	<p>The proposed project would comply with San Francisco Water Efficient Irrigation Ordinance requirements.</p>
Residential Water Conservation Ordinance (San Francisco Building Code, Housing Code, Chapter 12A)	<p>Requires all residential properties (existing and new), prior to sale, to upgrade to the following minimum standards:</p> <ol style="list-style-type: none"> 1. All showerheads have a maximum flow of 2.5 gallons per minute (gpm) 2. All showers have no more than one showerhead per valve 3. All faucets and faucet aerators have a maximum flow rate of 2.2 gpm 4. All Water Closets (toilets) have a maximum rated water consumption of 1.6 gallons per flush (gpf) 5. All urinals have a maximum flow rate of 1.0 gpf 6. All water leaks have been repaired. <p>Although these requirements apply to existing buildings, compliance must be completed through the Department of Building Inspection, for which a discretionary permit (subject to CEQA) would be issued.</p>	<input checked="" type="checkbox"/> Project Complies <input type="checkbox"/> Not Applicable <input type="checkbox"/> Project Does Not Comply	<p>The proposed project would comply with the Residential Water Conservation Ordinance by meeting at least the minimum standards specified in the ordinance as applicable and/or required.</p>

(Table 4, continued)

Regulation	Requirements	Project Compliance	Discussion
Residential Energy Conservation Ordinance (San Francisco Building Code, San Francisco Housing Code, Chapter 12)	<p>Requires all residential properties to provide, prior to sale of property, certain energy and water conservation measures for their buildings: attic insulation; weather-stripping all doors leading from heated to unheated areas; insulating hot water heaters and insulating hot water pipes; installing low-flow showerheads; caulking and sealing any openings or cracks in the building's exterior; insulating accessible heating and cooling ducts; installing low-flow water-tap aerators; and installing or retrofitting toilets to make them low-flush. Apartment buildings and hotels are also required to insulate steam and hot water pipes and tanks, clean and tune their boilers, repair boiler leaks, and install a time-clock on the burner.</p> <p>Although these requirements apply to existing buildings, compliance must be completed through the Department of Building Inspection, for which a discretionary permit (subject to CEQA) would be issued.</p>	<input checked="" type="checkbox"/> Project Complies <input type="checkbox"/> Not Applicable <input type="checkbox"/> Project Does Not Comply	There is an existing residential use at the project site; therefore, the project would comply with the Residential Energy Conservation Ordinance by meeting at least the minimum standards specified in the ordinance as applicable and/or required.
Waste Reduction Sector			
Mandatory Recycling and Composting Ordinance (San Francisco Environment Code, Chapter 19) and San Francisco Green Building Requirements for solid waste (San Francisco Building Code, Chapter 13C)	<p>All persons in San Francisco are required to separate their refuse into recyclables, compostables and trash, and place each type of refuse in a separate container designated for disposal of that type of refuse.</p> <p>Pursuant to Section 1304C.0.4 of the Green Building Ordinance, all new construction, renovation and alterations subject to the ordinance are required to provide recycling, composting and trash storage, collection, and loading that is convenient for all users of the building.</p>	<input checked="" type="checkbox"/> Project Complies <input type="checkbox"/> Not Applicable <input type="checkbox"/> Project Does Not Comply	The proposed project would comply with San Francisco Green Building Requirements for solid waste by providing space for recycling, composting and trash storage, collection, and loading that is convenient for all users of the building.
San Francisco Green Building Requirements for construction and demolition debris recycling (San Francisco Building Code, Chapter 13C)	Projects proposing demolition are required to divert at least 75% of the project's construction and demolition debris to recycling.	<input checked="" type="checkbox"/> Project Complies <input type="checkbox"/> Not Applicable <input type="checkbox"/> Project Does Not Comply	The project sponsor would comply with San Francisco Green Building Requirements for construction and demolition debris recycling during the proposed demolition and construction of this project.

(Table 4, continued)

Regulation	Requirements	Project Compliance	Discussion
San Francisco Construction and Demolition Debris Recovery Ordinance (San Francisco Environment Code, Chapter 14)	Requires that a person conducting full demolition of an existing structure to submit a waste diversion plan to the Director of the Environment which provides for a minimum of 65% diversion from landfill of construction and demolition debris, including materials source separated for reuse or recycling.	<input checked="" type="checkbox"/> Project Complies <input type="checkbox"/> Not Applicable <input type="checkbox"/> Project Does Not Comply	The project sponsor would comply with San Francisco Green Building Requirements for construction and demolition debris recovery.
Environment/Conservation Sector			
Construction Site Runoff Pollution Prevention for New Construction (San Francisco Building Code, Chapter 13C)	<p>Construction Site Runoff Pollution Prevention requirements depend upon project size, occupancy, and the location in areas served by combined or separate sewer systems.</p> <p>Projects meeting a LEED® standard must prepare an erosion and sediment control plan (LEED® prerequisite SSP1).</p> <p>Other local requirements may apply regardless of whether or not LEED® is applied such as a stormwater soil loss prevention plan or a Stormwater Pollution Prevention Plan (SWPPP).</p> <p>See the SFPUC Web site for more information: www.sfwater.org/CleanWater</p>	<input checked="" type="checkbox"/> Project Complies <input type="checkbox"/> Not Applicable <input type="checkbox"/> Project Does Not Comply	The proposed project would comply with San Francisco Green Building Requirements for construction site runoff pollution prevention as applicable and required.
Low-emitting Adhesives, Sealants, and Caulks (San Francisco Building Code, Chapters 13C.5.103.1.9, 13C.5.103.4.2, 13C.5.103.3.2, 13C.5.103.2.2, 13C.504.2.1)	<p>If meeting a LEED Standard:</p> <p>Adhesives and sealants (VOCs) must meet SCAQMD Rule 1168 and aerosol adhesives must meet Green Seal standard GS-36. (Not applicable for New High Rise residential)</p> <p>If meeting a GreenPoint Rated Standard:</p> <p>Adhesives and sealants (VOCs) must meet SCAQMD Rule 1168.</p>	<input checked="" type="checkbox"/> Project Complies <input type="checkbox"/> Not Applicable <input type="checkbox"/> Project Does Not Comply	The proposed project would comply with San Francisco Green Building Requirements for low-emitting adhesives, sealants, and caulks as applicable and required.

(Table 4, continued)

Regulation	Requirements	Project Compliance	Discussion
Low-emitting materials (San Francisco Building Code, Chapters 13C.4.103.2.2	<p>For Small and Medium-sized Residential Buildings - Effective January 1, 2011 meet GreenPoint Rated designation with a minimum of 75 points.</p> <p>For New High-Rise Residential Buildings - Effective January 1, 2011 meet LEED Silver Rating or GreenPoint Rated designation with a minimum of 75 points.</p> <p>For Alterations to residential buildings submit documentation regarding the use of low-emitting materials.</p> <p>If meeting a LEED Standard:</p> <p>For adhesives and sealants (LEED credit EQ4.1), paints and coatings (LEED credit EQ4.2), and carpet systems (LEED credit EQ4.3), where applicable.</p> <p>If meeting a GreenPoint Rated Standard:</p> <p>Meet the GreenPoint Rated Multifamily New Home Measures for low-emitting adhesives and sealants, paints and coatings, and carpet systems.</p>	<input checked="" type="checkbox"/> Project Complies <input type="checkbox"/> Not Applicable <input type="checkbox"/> Project Does Not Comply	The proposed project would comply with San Francisco Green Building Requirements for low-emitting materials (adhesives and sealants, paints and coatings, and carpet systems) as applicable and required.
Low-emitting Paints and Coatings (San Francisco Building Code, Chapters 13C.5.103.1.9, 13C.5.103.4.2, 13C.5.103.3.2, 13C.5.103.2.2 13C.504.2.2 through 2.4)	<p>If meeting a LEED Standard:</p> <p>Architectural paints and coatings must meet Green Seal standard GS-11, anti-corrosive paints meet GC-03, and other coatings meet SCAQMD Rule 1113.</p> <p>(Not applicable for New High Rise residential)</p> <p>If meeting a GreenPoint Rated Standard:</p> <p>Interior wall and ceiling paints must meet <50 grams per liter VOCs regardless of sheen. VOC Coatings must meet SCAQMD Rule 1113.</p>	<input checked="" type="checkbox"/> Project Complies <input type="checkbox"/> Not Applicable <input type="checkbox"/> Project Does Not Comply	The proposed project would comply with San Francisco Green Building Requirements for low-emitting paints and coatings as applicable and required.

(Table 4, continued)

Regulation	Requirements	Project Compliance	Discussion
Low-emitting Flooring, including carpet (San Francisco Building Code, Chapters 13C.5.103.1.9, 13C.5.103.4.2, 13C.5.103.3.2, 13C.5.103.2.2, 13C.504.3 and 13C.4.504.4)	<p>If meeting a LEED Standard: Hard surface flooring (vinyl, linoleum, laminate, wood, ceramic, and/or rubber) must be Resilient Floor Covering Institute FloorScore certified; carpet must meet the Carpet and Rug Institute (CRI) Green Label Plus; Carpet cushion must meet CRI Green Label; carpet adhesive must meet LEED EQc4.1. (Not applicable for New High Rise residential)</p> <p>If meeting a GreenPoint Rated Standard: All carpet systems, carpet cushions, carpet adhesives, and at least 50% of resilient flooring must be low-emitting.</p>	<input checked="" type="checkbox"/> Project Complies <input type="checkbox"/> Not Applicable <input type="checkbox"/> Project Does Not Comply	The proposed project would comply with San Francisco Green Building Requirements for low-emitting flooring as applicable and required.
Low-emitting Composite Wood (San Francisco Building Code, Chapters 13C.5.103.1.9, 13C.5.103.4.2, 13C.5.103.3.2, 13C.5.103.2.2 and 13C.4.504.5)	<p>If meeting a LEED Standard: Composite wood and agrifiber must not contain added urea-formaldehyde resins and must meet applicable CARB Air Toxics Control Measure.</p> <p>If meeting a GreenPoint Rated Standard: Must meet applicable CARB Air Toxics Control Measure formaldehyde limits for composite wood.</p>	<input checked="" type="checkbox"/> Project Complies <input type="checkbox"/> Not Applicable <input type="checkbox"/> Project Does Not Comply	The proposed project would comply with San Francisco Green Building Requirements for low-emitting composite wood as applicable and required.
Regulation of Diesel Backup Generators (San Francisco Health Code, Article 30)	<p>Requires (among other things):</p> <ul style="list-style-type: none"> • All diesel generators to be registered with the Department of Public Health • All new diesel generators must be equipped with the best available air emissions control technology. 	<input checked="" type="checkbox"/> Project Complies <input type="checkbox"/> Not Applicable <input type="checkbox"/> Project Does Not Comply	The proposed project would comply with San Francisco Health Code, Article 30, for diesel generators.

Source: Turnstone Consulting

Depending on a proposed project's size, use, and location, a variety of controls are in place to ensure that a proposed project would not impair the State's ability to meet statewide GHG reduction targets outlined in AB 32, or impact the City's ability to meet San Francisco's local GHG reduction targets. Given that: (1) San Francisco has implemented regulations to reduce GHG emissions specific to new construction and renovations of private developments and municipal projects; (2) San Francisco's sustainable policies have resulted in the measured reduction of annual GHG emissions; (3) San Francisco has met and exceeds AB 32 GHG

reduction goals for the year 2020 and is on track towards meeting long-term GHG reduction goals; (4) current and probable future state and local GHG reduction measures will continue to reduce a project's contribution to climate change; and (5) San Francisco's *Strategies to Address Greenhouse Gas Emissions* meet the CEQA and BAAQMD requirements for a Greenhouse Gas Reduction Strategy, projects that are consistent with San Francisco's regulations would not contribute significantly to global climate change. The proposed project would be required to comply with the requirements listed above, and was determined to be consistent with San Francisco's *Strategies to Address Greenhouse Gas Emissions*.⁶¹ As such, the proposed project would result in a less-than-significant impact with respect to GHG emissions. No mitigation measures are necessary.

Topics:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Not Applicable
9. WIND AND SHADOW—Would the project:					
a) Alter wind in a manner that substantially affects public areas?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Create new shadow in a manner that substantially affects outdoor recreation facilities or other public areas?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Impact WS-1: The proposed project could alter wind in a manner that substantially affects public areas. (*Potentially Significant*)

The difference in atmospheric pressure between two points on the earth causes air masses to move from the area of higher pressure to the area of lower pressure. This movement of air masses results in wind currents. The direction and speed of wind currents can be altered by natural features of the land or by buildings and structures. Groups of buildings clustered together tend to act as obstacles that reduce wind speeds; the heights, massing, and orientations or profiles of the buildings are some of the factors that can affect wind speeds. When a building is much taller than those around it, rather than a similar height, it can intercept and redirect winds downward that might otherwise flow overhead. The massing of a building can affect wind speeds. In general, slab-shaped buildings have the greatest potential to accelerate ground-level winds, while buildings that have unusual shapes or are more geometrically complex tend to have lesser effects. The orientation or profile of a building is another factor that can affect wind speeds. When the wide face of a building, as opposed to its narrow face, is oriented toward the prevailing wind direction, the building has more surface area to intercept and redirect winds down to ground level.

⁶¹ San Francisco Planning Department, *GHG Analysis Compliance Checklist*, for the 1333 Gough Street / 1481 Post Street Project, submitted February 14, 2013. A copy of this document is available for review at the San Francisco Planning Department, 1650 Mission Street, Suite 400, as part of Case File No. 2005.0679E.

Implementation of the proposed project would result in the construction of a building that would be 398 feet tall (plus mechanical penthouse). The proposed project, which would be taller than the existing buildings in the vicinity of the project site, has the potential to alter ground-level wind currents in a manner that would substantially affect public areas. The potential project-generated wind impacts will be discussed in the EIR, based on the results of a wind tunnel analysis.

Impact WS-2: The proposed project could create new shadow in a manner that could substantially affect outdoor recreation facilities or other public areas. *(Potentially Significant)*

In 1984, San Francisco voters approved an initiative known as “Proposition K, The Sunlight Ordinance,” which was codified in 1985 as Planning Code Section 295. Planning Code Section 295 prohibits the approval of “any structure that would cast any shade or shadow upon any property under the jurisdiction of, or designated for acquisition by, the Recreation and Park Commission” unless the Planning Commission, with review and comment by the Recreation and Park Commission, has found that the shadows cast by a proposed project would not have an adverse impact on the use of the property. The period analyzed is from the first hour after sunrise until the last hour before sunset.

Implementation of the proposed project would result in the construction of a building that would be 398 feet tall (plus mechanical penthouse). The proposed project, which would be required to comply with the provisions of Planning Code Section 295, has the potential to create new shadow that may substantially affect outdoor recreation facilities or other public areas. The potential project-generated shadow impacts will be discussed in the EIR, based on the results of a computer-generated shadow analysis.

Cumulative Impacts

Impact C-WS-1: The proposed project, in combination with past, present, and reasonably foreseeable future projects in the site vicinity, may result in cumulatively considerable contributions to significant cumulative impacts related to wind or shadow. *(Potentially Significant)*

The EIR analysis of wind impacts will be based on wind tunnel testing of scale models of the project site and surrounding development in the project vicinity. Wind tunnel testing will include a separate wind tunnel test run that includes existing development, the proposed project, and reasonably foreseeable new construction in the project vicinity. The results of the cumulative wind tunnel test run will be discussed and analyzed in the EIR.

The finding of potential effect is based on a preliminary shadow fan analysis prepared by the Planning Department.⁶² This analysis determined that the proposed project would shade the Cottage Row Mini-Park and Peace Plaza, a potentially significant environmental impact. This analysis also indicated the potential for the project shading to affect Hamilton Playground, Kimble Playground, and Sargent Macauley Park. The project's effects on these parks and public open spaces in the site vicinity will be the subject of a detailed computer-generated shadow study that will model shadows from the proposed project as well as those reasonably foreseeable nearby projects that may combine with project shadow to result in potentially adverse effects.

Topics:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Not Applicable
10. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Physically degrade existing recreational resources?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Impact RE-1: The proposed project would not increase use of existing neighborhood parks and/or other recreation facilities such that substantial physical deterioration or physical degradation of existing recreational resources would occur or be accelerated, nor would it include or result in the need for the expansion or construction of recreational facilities beyond those included in the proposed project. (*Less than Significant*)

The San Francisco Recreation and Park Department administers more than 200 parks, playgrounds, and open spaces throughout the City. Department recreation facilities also include 15 recreation centers, 9 swimming pools, 5 golf courses, and more than 300 athletic fields, tennis courts, and basketball courts.⁶³

Public park and open space facilities near the project site include the Japanese Peace Plaza, about 2 blocks west of the project site; Cottage Row Mini Park, about 4 blocks northwest of the project site; Lafayette Park, about 5 blocks north of the project site; Sergeant John Macaulay Park, about 5 blocks southeast of the project site; and Jefferson Square, about 2 blocks south of the project

⁶² Cabrerros, Glen. San Francisco Planning Department, Proposition K/Planning Code Section 295 Preliminary Shadow Analysis addressed to Cathedral Hill Associates, February 9, 2007. This document is available for review in Case File No. 2005.0679E at the San Francisco Planning Department, 1650 Mission Street, Suite 400.

⁶³ San Francisco Recreation and Park Department, Recreation Assessment Report, August 2004 (hereinafter "Recreation Assessment Report"). Available online at http://sf-recpark.org/ftp/uploadedfiles/wcm_recpark/Notice/_Summary_Report.pdf. Accessed September 17, 2012.

site; and Alta Plaza, about 11 blocks (1.5 miles) northwest of the project site. Public recreation facilities near the project site include Margaret S. Hayward Playground, about 0.6 mile south of the project site (this facility includes outdoor tennis courts); Hamilton Recreation Center, Playground, and Pool, about 0.7 mile west of the project site (this facility has outdoor tennis courts and an outdoor basketball court); Raymond Kimball Playground, about 0.7 mile southwest of the project site; the Buchanan Street Mall, about 0.8 mile southwest of the project site (this facility includes an outdoor basketball court); Ella Hill Hutch Community Center,⁶⁴ about 0.8 mile southwest of the project site; and Tenderloin Recreation Center, about 0.9 mile southeast of the project site. There are also outdoor tennis courts at Alta Plaza and Lafayette Park. Combined, these locations provide 5 ballfields, 2 multi-use fields, a swimming pool, 6 recreation centers, 4 outdoor basketball courts, 1 indoor basketball court, and 13 outdoor tennis courts.⁶⁵

The *San Francisco General Plan Recreation and Open Space Element* (Open Space Element) notes that “While the number of neighborhood parks and facilities is impressive, they are not well distributed throughout the City...The [unequal distribution] merits correction where neighborhoods lacking parks and recreation facilities also have relatively high needs for such facilities.” The Open Space Element defines “high need areas” as areas with high population density and high percentages of children, youth, seniors, or low-income households relative to the City as a whole. The Open Space Element defines “deficient” areas as areas that are not served by public open space, areas with population that exceeds the capacity of the open spaces that serve it, or areas with facilities that do not correspond well to neighborhood needs.

The high need areas and deficient areas are shown in the Open Space Element on Figures 3 through 8 and Map 9, and are based on information from the 1980 U.S. Census. The figures show that the project site is within a “high need” area based on household income, and is not within a “high need” area based on overall population density or density of children. The project site is within an area considered to have a “moderate” density of seniors relative to the City as a whole. The *General Plan* figures also show the project site to be served by public open space. The Revised Draft Open Space Element (June 2011) updated these maps to reflect 2005-2009 American Community Survey data and 2010 U.S. Census data. Figure 2, High Needs Areas, of the Revised Draft Open Space Element shows that the project site is within an area considered “high need” according to population density by block, household income, and density of seniors and is not within a “high need” area based on density of children. Figure 3, Priority Renovation & Acquisition Areas, of the Revised Draft Open Space Element designates areas to the southwest

⁶⁴ The Ella Hill Hutch Community Center is owned by the San Francisco Mayor’s Office and has four outdoor tennis courts and an indoor basketball court.

⁶⁵ Recreation Assessment Report, Appendix B, Service Area Maps. Margaret Hayward Playground is a Level 3 recreation facility and Hamilton Recreation Center is a Level 5 recreation facilities. Level 3 facilities offer clubhouses, fields, and after-school programs; Level 5 facilities offer gymnasiums, auditoriums, lights, and fields. Available online at http://sf-recpark.org/ftp/uploadedfiles/wcm_recpark/Notice/_Summary_Report.pdf. Accessed September 17, 2012.

and to the west of the project site as high priority for recreation and open space improvements, but does not designate the area as having service gaps.⁶⁶

The San Francisco Recreation and Park Department published a Recreation Assessment Report that evaluates the recreation needs of San Francisco residents. Nine service area maps were developed and included in the Recreation Assessment Report. The service area maps were intended to help Recreation and Park Department staff and City leadership assess where services are offered, how equitable the service delivery is across the City, and how effective the service is as it applies to the demographics of the service area. The maps (which were developed based on population served rather than distance) show that the project site is within the defined service areas for the existing Recreation and Park ballfields, multi-use/soccer fields, recreation centers, pools, and tennis courts nearby, and is not within the service area for the nearest outdoor basketball courts. Compared to the standards recommended in the report, additional ballfields, multi-use/soccer fields, and outdoor basketball courts are needed for the City as a whole. Parts of District 5, the supervisorial district in which the project site is located, are considered underserved by recreation facilities; however, the 2004 Recreation Assessment Report shows the western part of the project site to be within the service area for the Hamilton Recreation Center.⁶⁷

The proposed project's 262 residential units would conservatively add approximately 597 people to the existing Census Tract 155 population of 3,622, an increase of approximately 16 percent. The increase in population would increase the demand for park and recreation facilities. However, the increase in demand would not be in excess of amounts expected and provided for in the project area and the City as a whole. The proposed project is within the service areas of public parks and open spaces and multiple recreational facilities. These facilities can be easily accessed by walking or using transit from the project site. The additional use of these facilities would be relatively minor compared with the existing use of the facilities, and would not increase use such that substantial deterioration of the facilities would occur or would be accelerated. The project area has not been identified as a priority renovation and acquisition area according to the Recreation and Open Space Element of the *San Francisco General Plan*.⁶⁸

The proposed project would provide Planning Code-required private and common open space for project residents. For the existing building at 1333 Gough Street, private open space would total about 18,740 sq. ft., consisting of existing balconies, and rebuilt decks at the second floor. New common open space, in the form of a proposed ground-level garden along Gough Street (576 sq. ft.) would also serve residents of the 1333 Gough Street building. For future residents of the proposed 1481 Post Street building, private rooftop open space would be provided for the penthouse units (404 sq. ft.). Common open space for the building (totaling 14,953 sq. ft.) would

⁶⁶ San Francisco Recreation and Park Department, Acquisition Policy, August 2011. Available online at http://sfrecpark.org/documents/Acquisition_Policy_2011.pdf. Accessed September 17, 2012.

⁶⁷ Recreation Assessment Report, pp. 20-23 and Maps.

⁶⁸ San Francisco Recreation and Open Space Element, Revised Draft, June 2011, p. 21.

be provided in a proposed ground level garden and two terraces at the second floor. The proposed 1481 Post Street building would also include a new fitness amenity and pool facilities for tower residents. In addition, the existing (privately operated) fitness center in 1333 Gough Street would be remodeled and would include a new pool, which would be housed in the addition to 1333 Gough Street. The private and common open spaces, the fitness center and pool amenities associated with the proposed 1481 Post Street building, and the remodeled fitness center and new pool facility in 1333 Gough Street would partly serve the demand for open space and recreational facilities generated by the project residents.

The two existing privately operated tennis courts on the site would be removed when the existing parking structure is demolished, and they would not be replaced under the proposed project. Without the existing tennis courts at the project site, tennis players could increase the use of public tennis courts elsewhere in the City. However, the number of public tennis courts in the City is close to the recommended national guideline of one court per 5,000 people.⁶⁹ In addition, there are 13 free, publicly available outdoor tennis courts nearby at Alta Plaza (3 courts), Lafayette Park (2 courts), Hamilton Recreation Center (2 courts), the Margaret Hayward Playground (2 courts), and the Ella Hill Hutch Recreation Center (4 courts). The relatively small number of additional tennis players who may shift to City facilities is expected to be minor and would not be expected to increase the use of these courts to a level that would cause or accelerate substantial deterioration of those facilities.

For the reasons described above, the proposed project's impacts on park and recreation facilities would be less than significant.

Cumulative Impacts

Impact C-RE-1: The proposed project, in combination with other past, present, or reasonably foreseeable projects, would not contribute considerably to a significant impact on recreational resources leading to their physical deterioration or physical degradation, nor would it result in the construction or expansion of recreational facilities resulting in physical effects on the environment. (*Less than Significant*)

The types of cumulative impacts relevant to recreation include: (1) the project's contribution to the cumulative increase in demand for public recreational resources that could result in physical deterioration of such resources, and (2) other reasonably foreseeable projects that could result in a loss of recreational resources. The 2010 U.S. Census reported a population of 805,235 in the City and County of San Francisco. The population in San Francisco in 2030 is estimated to be about 934,800 (approximately 129,565 new residents).⁷⁰ The citywide population increase between 2010 and 2030 would be substantial, and would result in increased demand for recreational

⁶⁹ Recreation Assessment Report, pp. 21-23.

⁷⁰ ABAG, *Projections 2009*, p. 92.

resources in the City in the future. No development plans currently under consideration in San Francisco would result in the loss of recreational resources.

As described under Impact RE-1, implementation of the proposed project would result in the introduction of approximately 597 new residents to the project area, who would incrementally increase demand for recreational resources near the project site and in San Francisco generally. The provision of Planning Code-required private and common open space and amenities on the site would partially offset the demand for recreational resources and the potential for the deterioration and/or degradation of existing recreational resources in the project area.

As discussed in the Population and Housing section on p. 48, the population increase attributable to the proposed project would represent approximately 0.5 percent of the projected citywide increase in population of about 129,565 people between 2010 and 2030.⁷¹ The population increase of nearby reasonably foreseeable projects would constitute 1.18 percent of citywide growth for the same 20-year period. The increase in the use of nearby local recreational facilities associated with the anticipated population increase under the proposed project would not constitute a cumulatively considerable increase in the use of recreational facilities and would not contribute considerably to their physical deterioration or to the need to construct or expand recreational facilities to meet the additional demand.

Therefore, the proposed project would have a less-than-significant impact on recreational resources, and, when considered in combination with other past, present, or reasonably foreseeable projects, would not result in a cumulatively considerable contribution to significant recreation-related cumulative impacts. No mitigation is necessary.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
11. UTILITIES AND SERVICE SYSTEMS— Would the project:					
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

⁷¹ ABAG, *Projections 2009*, p. 92. Projected population for 2030 is 934,800 persons.

Topics:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Not Applicable
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g) Comply with federal, state, and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Impact UT-1: The proposed project would not exceed the wastewater treatment requirements of the Regional Water Quality Control Board. (*Less than Significant*)

The City's combined sanitary sewer and stormwater system collects, transports, and treats sanitary sewage and stormwater runoff in the same facilities. Discharges to federal and state waters are governed by two National Pollutant Discharge Elimination System (NPDES) permits, the 2008 Bayside Permit (NPDES Permit No. CA0037664) and the 2009 Oceanside Permit (NPDES Permit No. CA0037681). These permits are issued and enforced by the San Francisco Bay Regional Water Quality Control Board (RWQCB).

The project site is located in the Channel subdrainage area of the Bayside basin and is served by the City's combined sanitary sewer and stormwater system.⁷² All wastewater and stormwater flows that emanate from the Bayside basin are subject to the 2008 Bayside Permit. The 2008 Bayside Permit specifies discharge prohibitions, dry-weather effluent limitations, wet-weather effluent performance criteria, receiving water limitations, sludge management practices, and monitoring and reporting requirements for the Southeast Water Pollution Control Plant, the North Point Wet-Weather Facility, and the Bayside Wet-Weather Transport/Storage and Diversion Structures. During wet weather, the capacity at the Southeast Water Pollution Control Plant is supplemented by the North Point Wet-Weather Facility and the Bayside Wet-Weather Transport/Storage and Diversion Structures, a series of storage/transport boxes located around the perimeter of the City's bayside.⁷³ If wet-weather flows exceed the capacity of the overall system, the excess (primarily stormwater) is discharged from one of 36 combined sewer overflow (CSO)

⁷² San Francisco is roughly divided into two major drainage areas: the Bayside and Westside basins, which are further divided into eight subdrainage areas. *Draft San Francisco Sewer System Improvement Program Report*, August 10, 2010, Figure 1. San Francisco Major Drainage Basins and Wastewater Facilities, p. 2. Available online at <http://sfwater.org/modules/showdocument.aspx?documentid=984>. Accessed October 9, 2012.

⁷³ The storage/transport boxes provide treatment consisting of settling and screening of floatable materials inside the boxes and is equivalent to primary treatment at the wastewater treatment plants.

structures located along the waterfront. The permit prohibits overflows from the CSO structures during dry weather, and requires wet-weather overflows to comply with the nine minimum controls specified in the United States Environmental Protection Agency's (USEPA) Combined Sewer Overflow Control Policy.

Implementation of the proposed project is conservatively expected to result in about a 597-person increase in the average daily resident population at the project site over existing conditions. These 597 residents would be expected to generate about 26,865 gallons of wastewater per day.⁷⁴ In addition, the proposed project would increase the daily number of visitors to the project site (including employees of the proposed 1481 Post Street residential building and café, patrons of the proposed café, and increased fitness center membership).

These increases in residents and visitors to the project site would be in addition to wastewater generation associated with existing residents, employees, and visitors to 1333 Gough Street. The proposed project would therefore incrementally increase wastewater flows from the project site; however, the incremental increase would not affect the City's ability to treat the additional volume of wastewater because treatment capacity exists to serve this use and anticipated growth in service area population in the future. Project-related wastewater flows would be treated in accordance with the RWQCB-issued NPDES permits prior to discharge into the Bay. All CSO discharges are regulated with permits issued by the RWQCB and with the USEPA's National Combined Sewer Overflow Control Policy. Therefore, the proposed project would not result in an exceedance of any wastewater treatment requirements, and the impact would be less than significant. No mitigation is necessary.

Impact UT-2: The proposed project would not require or result in the construction of new, or the expansion of existing, water, wastewater treatment or stormwater drainage facilities; or result in a determination that the wastewater treatment provider has inadequate capacity to serve the project. (*Less than Significant*)

The City's combined sanitary sewer and stormwater system collects, transports, and treats sanitary sewage and stormwater runoff in the same facilities. Stormwater runoff comprises the primary source of total flows collected, conveyed, and eventually treated at the City's wastewater treatment facilities. Implementation of the proposed project is expected to incrementally increase wastewater flows from the project site associated with the anticipated new residents, employees, and visitors under the proposed project. The proposed project would incorporate water-efficient fixtures, as required by Title 24 of the California Code of Regulations and the City's Green Building Ordinance, into the new 1481 Post Street residential tower. Compliance with these regulations would reduce wastewater flows and the amount of potable water used for building functions.

⁷⁴ Wastewater is estimated as 90 percent of water usage, which is calculated in Impact UT-3.

The 1.86-acre project site is subject to the City's Stormwater Management Ordinance, which is intended to delay and/or reduce the amount of stormwater entering the combined sewer system. Compliance with the Stormwater Management Ordinance and the fact that impervious surfaces on the site would not increase would minimize total stormwater flows, which make up a large percentage of the total flow entering the combined sanitary sewer and stormwater system.

The 597 new residents of the project site would be expected to generate about 26,865 gallons of wastewater per day. In addition, the proposed project would increase the daily number of visitors to the project site (including employees of the proposed 1481 Post Street residential building and proposed café, patrons of the café, and increased fitness center membership).

The wastewater flow increases related to the introduction of new on-site uses and stormwater flow increases attributable to the proposed project would not require construction of new water, wastewater, and stormwater collection, conveyance, or treatment facilities; or the expansion of existing facilities. Thus, implementation of the proposed project would result in less-than-significant impacts on water, wastewater treatment and stormwater drainage facilities; and the incremental increase in combined wastewater and stormwater flows from the project site would not result in a determination by the San Francisco Public Utilities Commission (SFPUC) that it has insufficient capacity to continue providing wastewater treatment. No mitigation is necessary.

Impact UT-3: The proposed project would have sufficient water supply available from existing entitlements and would not require new or expanded water supply resources or entitlements. (*Less than Significant*)

The SFPUC provides an average of approximately 265 million gallons per day of water to approximately 2.5 million people in San Francisco, Santa Clara, Alameda, San Mateo, and Tuolumne Counties.⁷⁵ Approximately 96 percent of the water provided to San Francisco is supplied by the SFPUC Regional Water System, which is made up of water from the Hetch Hetchy Reservoir and Bay Area reservoirs in the Alameda Creek and Peninsula watersheds.⁷⁶ Present water demands are adequately sourced and transmitted via this infrastructure.

Implementation of the proposed project would incrementally increase the demand for water in San Francisco; it is anticipated that the additional residents would use 50 gallons per day, so the total water usage of the new residents would be about 29,850 gpd.⁷⁷ In addition, the proposed project would increase the daily number of visitors to the project site (including employees of the

⁷⁵ San Francisco Public Utilities Commission, *2010 Urban Water Management Plan for the City and County of San Francisco*, adopted June 2011 (hereinafter, *2010 Urban Water Management Plan*), pp. 7, 14, 22-25. Available online at <http://www.sfwater.org/Modules/ShowDocument.aspx?documentID=1055>. Accessed October 9, 2012.

⁷⁶ *2010 Urban Water Management Plan*, pp. 22-25. Groundwater and recycled water make up the remainder of the SFPUC supplies to the City.

⁷⁷ *2010 Urban Water Management Plan*, p. 34.

proposed 1481 Post Street residential building and proposed café, patrons of the café, and increased fitness center membership).

As a residential development that does not exceed 500 units, the proposed project does not require a Water Supply Assessment under SB 610 (California Water Code Section 10912(a)(1)) nor written verification from the water supplier of sufficient water supply under SB 221 (Government Code Section 66473.7 (a)(1)). The increase in water demand generated by the increased residential population on the project site and additional visitors to the project site under the proposed project would not be in excess of the projected demand for the project area and City as a whole under the City's Urban Water Management Plan.⁷⁸ In addition, the proposed project would be designed to incorporate water-conserving measures as required by Title 24 of the California Code of Regulations, the California Building Code.

Implementation of the proposed project would not require new or expanded water supply resources or entitlements, because the project site is within a developed urban area that is already served by the SFPUC. The proposed project would not generate additional demand for water that exceeds water supply projections. Impacts of the proposed project on water supply resources would therefore be less than significant, and no mitigation is necessary.

Impact UT-4: The proposed project would increase the amount of solid waste generated on the project site, but would be adequately served by the City's landfill and would comply with federal, state and local statutes and regulations related to solid waste. (*Less than Significant*)

Recology (formerly Norcal Waste Systems, Inc.) provides solid waste collection, recycling, and disposal services for residential and commercial garbage and recycling in San Francisco through its subsidiaries San Francisco Recycling and Disposal, Golden Gate Disposal and Recycling, and Sunset Scavenger. Recology's Golden Gate Disposal and Recycling subsidiary provides daily solid waste, recyclables, and compost pick-up service to the project site.

San Francisco's Mandatory Recycling and Composting Ordinance (No. 100-09) states that all persons located in San Francisco are required to separate recyclables, compostables, and landfilled trash and participate in recycling and composting programs. The ordinance covers any "property where refuse is generated...including schools, institutions, and City properties." San Francisco uses a three-cart collection program: residents and businesses sort solid waste into recyclables, compostable items such as food scraps and yard trimmings, and garbage. All materials are taken to the San Francisco Solid Waste Transfer and Recycling Center, located at 501 Tunnel Avenue in southeast San Francisco. There, the three waste streams are sorted and bundled for transport to the composting and recycling facilities and the landfill.

⁷⁸ 2010 Urban Water Management Plan, pp. 66-69, projects that, during normal precipitation years and multiple dry years, the SFPUC will have adequate supplies to meet projected demand through 2035.

San Francisco has created a large-scale urban program for the collection of compostable materials. Food scraps and other compostable material collected from residences, restaurants, and other businesses are sent to Recology's Jepson-Prairie composting facility, located in Solano County. Food scraps, plant trimmings, soiled paper, and other compostables are turned into a nutrient-rich soil amendment, or compost. Recyclable materials are sent to Recycle Central, located at Pier 96 on San Francisco's southern waterfront, where they are separated into commodities and sold to manufacturers that turn the materials into new products. Waste that is not composted or recycled is taken to the Class II disposal facility at the Altamont Landfill located east of Livermore in Alameda County.

In 1988, the City and County of San Francisco contracted for the disposal of 15 million tons of solid waste at the Altamont Landfill, a regional landfill that handles residential, commercial, and construction waste. The Altamont Landfill has a permitted maximum disposal of 11,500 tons per day, a maximum permitted capacity of 62 million cubic yards, and a remaining permitted capacity of about 45.7 million cubic yards.⁷⁹ The Altamont Landfill is estimated to continue operation until 2025.⁸⁰ The Altamont Landfill received about 1.29 million tons of waste in 2011.⁸¹ In 2011, San Francisco generated approximately 446,634 tons of solid waste and sent approximately 374,202 tons to the Altamont Landfill, about 33 percent of the total volume of waste received at that facility in 2011.⁸² The City contract with the Altamont Landfill expires in 2015.⁸³ Through August 1, 2009, the City has used approximately 12.5 million tons of this contract capacity. The City projects that the remaining contract capacity will be reached no sooner than August 2014.

Under the California Integrated Waste Management Act of 1989, San Francisco was required to adopt an integrated waste management plan, implement a program to reduce the amount of waste disposed, and have its waste diversion performance periodically reviewed by the California Integrated Waste Management Board. The City was required to reduce the amount of waste sent

⁷⁹ California Department of Resources Recycling and Recovery (CalRecycle), Facility/Site Summary Details: Altamont Landfill & Resource Recovery (01-AA-0009). Available online at <http://www.calrecycle.ca.gov/SWFacilities/Directory/01-AA-0009/Detail/>. Accessed August 16, 2012.

⁸⁰ CalRecycle, Facility/Site Summary Details: Altamont Landfill & Resource Recovery (01-AA-0009). Available online at <http://www.calrecycle.ca.gov/SWFacilities/Directory/01-AA-0009/Detail/>. Accessed August 16, 2012.

⁸¹ CalRecycle, Jurisdiction of Origin Waste Disposal By Facility. Available online at <http://www.calrecycle.ca.gov/LGCentral/Reports/Viewer.aspx?P=ReportName%3dReportEdrsFacilitySummaryByJurisdiction%26DisposalFacilityID%3d%26SwisNo%3d01-AA-0009>. Accessed August 16, 2012.

⁸² CalRecycle, Jurisdiction Disposal By Facility. Available online at <http://www.calrecycle.ca.gov/LGCentral/Reports/Viewer.aspx?P=OriginJurisdictionIDs%3d438%26ReportYear%3d2011%26ReportName%3dReportEDRSJurisDisposalByFacility>. Accessed August 16, 2012.

⁸³ San Francisco is currently participating as a responsible agency in the environmental review process that Yuba County has begun for the *Recology Ostrom Road Green Rail and Permit Amendment Project* to conduct CEQA review of San Francisco's proposal to enter into one or more new agreements with Recology for disposal and transportation of San Francisco's solid waste. On March 28, 2013, Yuba County and San Francisco entered into a Cooperative Agreement to designate Yuba County as the lead agency for that project and to outline their cooperative efforts concerning environmental review of that project.

to landfill by 50 percent by 2000. The City met the 50 percent reduction goal in 2000 by recycling, composting, reuse, and other efforts, and achieved 70 percent reduction in 2006. San Francisco exceeded its goal to divert 75 percent of its waste by 2010 and will implement new strategies to meet its zero waste goal by 2020.⁸⁴

In 2007, the state altered its evaluation criteria for assessing a jurisdiction's programmatic effectiveness in reducing solid waste with the passage of the Solid Waste Disposal Measurement Act in Senate Bill 1016. As a result, the former diversion rate measurement system has been replaced by a system that sets a 50 percent Equivalent Per Capita Disposal Target (resident or employee) for the state and each jurisdiction. In 2010, the target disposal rate for San Francisco residents and employees was 6.6 pounds/resident/day and 10.6 pounds/employee/day. Both of these targeted disposal rates were met in 2010 (the most recent year reported), with San Francisco residents generating about 3.0 pounds/resident/day and employed persons in San Francisco generating about 5.0 pounds/per employee/per day.⁸⁵

Implementation of the proposed project would increase the average daily throughput at the Altamont Landfill. The maximum daily increase in solid waste produced by the proposed project residents (approximately 597 new residents) would be 1,791 pounds per day. In addition, the proposed project would increase the daily number of visitors to the project site (including employees of the proposed 1481 Post Street residential building and proposed café, patrons of the café, and increased fitness center membership).

The increase in residential population and visitors on the project site under the proposed project would translate into a negligible percentage of the Altamont Landfill's maximum total permitted throughput of about 11,150 tons per day. This landfill is projected to have sufficient capacity to operate until at least 2025, with the potential to operate for a longer period of time, depending on waste flows and incorporation of statewide waste reduction measures. Therefore, the increase in solid waste from implementation of the proposed project could be accommodated at the Altamont Landfill's existing permitted capacities, and this would constitute a less-than-significant impact.

Prior to receipt of a demolition permit, the proposed project is required to show compliance with the City's Construction and Demolition Debris Recovery Ordinance (Ordinance 27-06). Requirements for a full demolition include the development of a waste diversion plan that provides for a minimum of 65 percent diversion of construction and demolition debris, including materials source separated for reuse and recycling. The City's Green Building Ordinance, which became effective January 1, 2009, would require that at least 75 percent of the project's construction debris is diverted from the landfill. The project sponsor would meet the 75 percent

⁸⁴ San Francisco Department of the Environment, Zero Waste Program. Available online at <http://sfenvironment.org/zero-waste>. Accessed August 16, 2012.

⁸⁵ CalRecycle, Jurisdiction Diversion/Disposal Rate Detail. Available online at <http://www.calrecycle.ca.gov/LGCentral/reports/diversionprogram/JurisdictionDiversionDetail.aspx?JurisdictionID=438&Year=2010>. Accessed August 16, 2012.

diversion requirement. As described under Initial Study Topic E.16, Hazards and Hazardous Materials, excavated soil that is classified as a hazardous waste would be disposed of in a Class I permitted landfill in accordance with applicable laws and regulations for the disposal of hazardous waste. Soil not classified as a hazardous waste could be disposed of in a Class III permitted landfill such as the Class III disposal facility at the Altamont Landfill, or, more likely, would be reused at another site. Approximately 83,000 cubic yards of soil would be excavated from the project site and would be shipped off site. (It is not expected that the majority of this excavated soil would be classified as hazardous.)

Given the above, the direct effects of solid waste associated with the construction and operation of the proposed project would not substantially affect the projected life of the Altamont Landfill. The proposed project would be adequately served by landfill with sufficient capacity to accommodate the solid waste disposal needs of the proposed project. The construction and operational components of the waste stream generated at the project site would be expected to fully adhere to published federal, state, and local statutes and regulations related to solid waste. The proposed project would therefore result in a less-than-significant impact on the disposal capacity of the identified landfill.

Cumulative Impacts

Impact C-UT-5: The proposed project, in combination with other past, present, or reasonably foreseeable future projects, would not result in a considerable contribution to a significant impact on utilities and service systems. (*Less than Significant*)

Reasonably foreseeable cumulative projects in the project area and elsewhere in the City would incrementally increase demand on citywide utilities and service systems.

Given that the City's existing service and management plans address anticipated growth in the region and that this cumulative growth is accounted for in these plans, the proposed project's contribution to anticipated utilities service demands would not be considerable. Combined with other foreseeable projects, it would not generate water or wastewater demand in such a manner as to require the acquisition of new water rights, or the construction of new or upgraded storage, treatment or conveyance facilities, the construction of any of which may result in a significant effect on the environment.

Topics:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact	Not Applicable
12. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Impact PS-1: The proposed project would not result in substantial adverse physical impacts associated with the provision of police protection, fire protection, schools, and library services in order to maintain acceptable service ratios, response times, or other performance objectives. (*Less than Significant*)

Police Protection Services

The San Francisco Police Department (SFPD) provides police protection services in the City and County of San Francisco. The project site is located within the Northern Police District, which consists of the Western Addition, Pacific Heights, Japantown, Polk Gulch, Russian Hill and the Marina neighborhoods. The district is served by the Northern Police Station, located at 1125 Fillmore Street, about 0.7 mile southwest of the project site. The station is staffed by approximately 138 officers.⁸⁶

Implementation of the proposed project would increase the number of residents, employees, and visitors at the project site. SFPD bases its estimates for additional facilities on calls for service, types and times of traffic and pedestrian flow patterns, and operational hours of uses within each Police District area, and not on increases in population.⁸⁷

The proposed project would, as part of the permit review process, work with the SFPD and the Department of Emergency Management to ensure that emergency communication systems within the new high-rise building are functional and appropriately designed. Communication systems would be incorporated into the proposed project to the extent practicable based on consultation with SFPD.

⁸⁶ The Public Safety Strategies Group. 2008 (May 13). *San Francisco Police Department District Station Boundaries Analysis Final Report*, pp. D5–D6. Available: <http://sf-police.org/Modules/ShowDocument.aspx?documentid=14683>.

⁸⁷ San Francisco Planning Department, *Transit Center District Plan and Transit Tower Final Environmental Impact Report*, Case No. 2007.0558E and 2008.0789E, May 24, 2012, p. 546.

SFPD policy is to accommodate the additional growth with existing infrastructure through re-deployment of resources from other areas of the City, if needed.⁸⁸ Additional residents, employees and visitors at the project site that are anticipated under the proposed project would be accommodated in such a manner and would not require new or physically altered police facilities, the construction of which could cause significant environmental effects. Thus, the proposed project's impact on police protection services would be less than significant, and no mitigation is necessary.

Fire Protection and Emergency Services

The San Francisco Fire Department (SFFD), headquartered at 698 Second Street, provides fire suppression and emergency medical services to the City and County of San Francisco. The SFFD consists of 3 divisions, which are subdivided into 10 battalions and 42 active stations located throughout the City. Fire protection for the proposed project would be provided primarily by Station 3, the closest fire station, located at 1067 Post Street, approximately 0.4 mile east of the project site. Station 3 houses one aerial ladder truck and one fire engine. Staffing includes two officers and seven firefighters, for a total of nine staff members.⁸⁹ Nearby stations also include Station 38 at 2150 California Street and Station 5 at 1301 Turk Street. Fire Station 38 houses one fire engine and a mobile command vehicle. Staffing for Station 38 includes one battalion chief, one officer, and three firefighters, for a total of five staff members. The Auxiliary Water Supply System, which provides a dedicated high-pressure water system for fire suppression, serves the project site.⁹⁰

The proposed project would not require the SFFD to construct additional facilities to meet the additional demand; the proposed project would, however, increase property tax revenues paid into the City's General Fund, which could, in turn, support personnel growth at the SFFD. There are currently no plans to increase SFFD personnel beyond that which would be necessary to staff a new station planned at Third Street and Mission Rock in the Mission Bay neighborhood to the southeast.

Studies have shown that buildings greater than three stories in height increase emergency medical service (EMS) response times. The proposed 36-story project tower would adhere to all applicable Building Code and Fire Code provisions to avoid most of the problems associated with

⁸⁸ See statements by the police department in the *Transit Center District and Tower EIR*, Case Nos. 2007.0558E and 2008.0789E, September 29, 2011, 546, and in the *California Pacific Medical Center Long Range Development Plan EIR*, Case No. 2005.0555E, July 21, 2010, pp. 4.11-16, 4.11-28, 4.11-36.

⁸⁹ San Francisco Planning Department, *California Pacific Medical Center Long Range Development Plan EIR*, Case No. 2005.0555E, July 21, 2010, p. 4.11-3.

⁹⁰ Final Report Auxiliary Water Supply System (AWSS) Study, January 23, 2009, p. VII, accessed at <http://www.sfgov2.org/ftp/uploadedfiles/cpp/documents/AWSS%20Report%20Final%202009-01-23.pdf>, on October 9, 2012.

emergency response to new construction. Further, San Francisco's EMS Agency recommends that all new high-rise buildings use a system to assist entry of Fire Department and/or EMS personnel, including a protocol to greet paramedics at the door of the building or in the street, to assist in navigation to the patient, as well as to provide express elevator service when necessary. The proposed project would meet these protocols and building management would have full-time employees on site who would be trained in these procedures. These measures would ensure that any potential delay by fire or emergency medical response due to building height would be minimized, and that care would be provided prior to their arrival. Combined with strict adherence to Fire Codes, fire and medical emergency response would not be significantly affected.⁹¹

For these reasons, potential impacts on fire protection and emergency services access are anticipated to be less than significant. No mitigation is necessary.

Schools

The San Francisco Unified School District (SFUSD) operates San Francisco's public schools. SFUSD managed 109 schools during the 2011–2012 academic year (72 elementary schools, 12 middle schools, 14 high schools, and 11 charter schools) with a total enrollment of over 55,000 pupils.⁹² SFUSD student enrollment declined from 1995 to 2007 and has stabilized since then.⁹³

In the years to come, SFUSD anticipates that elementary school and middle school enrollment will grow, but high school enrollment is expected to decline due to the declining birth rates of the 1990s. Additional schools are under consideration in fast-growing areas of San Francisco, e.g., Mission Bay, Treasure Island, and Bayview Hunters Point, but no final decisions have been made.

The proposed project would introduce up to 262 residential units and would generate an estimated 53 students who may attend the SFUSD schools.⁹⁴ This analysis assumes conservatively that all students at the proposed project would attend SFUSD schools.

⁹¹ San Francisco Planning Department, *Transit Center District Plan and Transit Tower Final Environmental Impact Report*, Case No. 2007.0558E and 2008.0789E, May 24, 2012, p. 547.

⁹² San Francisco Unified School District Overview, <http://www.sfusd.edu/en/about-sfusd/sfusd-profile.html>; accessed July 30, 2012.

⁹³ California Department of Education, Educational Demographics Office, <http://dq.cde.ca.gov/dataquest>, accessed September 26, 2012.

⁹⁴ The SFUSD employs a student generation rate of 0.203 students per new housing unit for planning purposes. See discussion in *Eastern Neighborhoods Community Rezoning and Area Plans Final Environmental Impact Report*, August 2008, Initial Study, p. 42. This is lower than the rate used by the California Department of Education, as San Francisco is more urbanized and has a lower ratio of school-age children relative to its population than most communities statewide. A copy of this document is available for review at the San Francisco Planning Department, 1650 Mission Street, Suite 400, as part of Case File No. 2005.0679E.

The Leroy F. Greene School Facilities Act of 1998, or Senate Bill 50 (SB 50), restricts the ability of local agencies such as the City and County of San Francisco to deny land use approvals on the basis that public school facilities are inadequate. SB 50, however, permits the levying of developer fees to address local school facility needs resulting from new development. The School Facilities Impact Fees to be collected for residential, commercial, and retail developments as of summer 2010 are set at \$2.24/sq. ft. for new residential construction, \$0.27/sq. ft. for office space, and \$0.18/sq. ft. for retail space.

Local jurisdictions are precluded under state law (SB 50) from imposing school-enrollment–related mitigation beyond the school development fees. Therefore, potential effects associated with additional development that could result from construction and operation of the proposed project would be considered less than significant. Based on the foregoing, no mitigation is necessary.

Libraries

The San Francisco Public Library operates the Main Library at Civic Center, at 100 Larkin Street, and 28 neighborhood branches throughout San Francisco. Community-based branch libraries, as well as the Main Library, provide reading rooms, book lending, information services, access to technology, and library-sponsored public programs. Public libraries near the project site are the Western Addition Branch at 1550 Scott Street, 0.8 mile away; the Main Library, 0.9 mile away; and the Golden Gate Valley Branch at 1801 Green Street, 1.1 miles away.

In 1994, San Francisco voters passed Proposition E, a Charter amendment that created the Library Preservation Fund, which provided library services and materials, and aids in the operation of library facilities. Proposition E requires the City to maintain funding for the San Francisco Public Library at a level no lower than the amount it spent during the 1992–1993 fiscal year. Voters renewed the Library Preservation Fund in November 2007 (Proposition D).

The Branch Library Improvement Program resulted from a bond measure passed in November 2000 to provide \$106 million in funding to upgrade San Francisco’s branch library system, and Proposition D, which passed in November 2007, authorizing additional funding to improve the branches.

Implementation of the proposed project is anticipated to introduce about 597 residents and about 31 net new employees into the neighborhood. The existing library branches near the project site, the Western Addition Branch, the Main Library, and the Golden Gate Valley Branch, would be able to meet the demand for library services generated by the additional residents, and implementation of the proposed project would not require construction of new or expanded library facilities.

Thus, the new, existing, and rebuilt San Francisco Public Library branches could accommodate increased demand from the proposed project, and no additional library facilities would be required. Impacts on library services would be less than significant, and no mitigation measures are necessary.

Cumulative Impacts

Impact C-PS-1: The proposed project, in combination with other past, present or reasonably foreseeable future projects, would not result in a cumulatively considerable contribution to significant cumulative impacts on police services, and fire protection and emergency services. (*Less than Significant*)

As discussed above under Impact PS-1, public service providers have anticipated increased demand for services based on projected cumulative growth. When considered with reasonably foreseeable projects in the vicinity of the project site, implementation of the proposed project would incrementally increase demand for police protection, fire protection, and emergency services, though not beyond the levels anticipated and planned for by these service providers. These incremental increases in demand for services would not require new or physically altered public service facilities. Therefore, the proposed project would not result in a cumulatively considerable contribution to significant cumulative impacts on police protection, fire protection and emergency services, school services and library services, and this impact would be less than significant.

Topics:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact	Not Applicable
13. 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 Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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 Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Topics:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact	Not Applicable
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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 in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service; on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations; or on federally protected wetlands through direct removal, filling, hydrological interruption, or other means. (No Impact)

The project site is located within a developed urban area in San Francisco and is developed with a residential building, a fitness center, tennis courts, and parking. The site is mostly covered by impervious surfaces. Historically, urban development has dominated this area of San Francisco, including the project site, and the vast majority of native habitat has been removed. Although some parts of San Francisco support riparian habitat and several sensitive natural plant communities, none of these features are present on the project site or in its vicinity. Additionally, there are no federally protected wetlands on or near the project site.

An independent arborist surveyed the trees within the project site and along the adjacent streets.⁹⁵ Along the northern boundary of the project site, there are 18 London plane (*Platanus x acerifolia*) trees within the Post Street right-of-way, and three ginkgo (*Ginkgo biloba*) trees near the corner of Post and Gough Streets. There are six London plane trees within the Gough Street right-of-way and three ginkgo trees near 1333 Gough. Along the southern boundary of the project site, there are eight Western sycamore (*Platanus racemosa*) trees and five London plane trees within the Geary Boulevard right-of-way and five ginkgo trees near the existing building. Site landscaping generally consists of ivy and bushes within a five-foot-setback along the northern boundary; ivy, camellias, and bushes in planting areas near the building entries along Gough Street; and ivy, bushes, and the ginkgo trees mentioned earlier within a 10-foot-setback along Geary Boulevard.

⁹⁵ Clark, James R., Ph.D., Certified Arborist, HortScience, Tree Assessment, 1333 Gough Street, letter report, August 8, 2007. A copy of this document is available for public review at the San Francisco Planning Department, 1650 Mission Street, Suite 400, in Case File No. 2005.0679E.

The proposed project would include redevelopment of the western part of the site with a residential tower, with a rebuilt fitness center and underground parking for residents. Up to 30 trees would be removed as part of the project, including all 11 of the ginkgo trees within the project site, one London plane tree along Geary Boulevard, and potentially all 18 of the London plane trees along Post Street. These trees are not considered rare or endangered; the trees are not part of any native habitat on the site. However, 9 of the 11 ginkgos meet the City's definition of significant in the protection ordinance based on their size and location, as discussed in Impact BI-3.⁹⁶ The project would not affect a rare or endangered plant or animal species or its habitat, riparian habitat or sensitive natural communities, or wetlands.

Although birds and mammals habituated to urban disturbance are capable of occupying the habitats that this vegetation provides, these urban patches of landscaped vegetation cannot support any candidate, sensitive, or special-status wildlife species potentially occurring in San Francisco. Therefore, there is no potential for candidate, sensitive, or special-status species to be found within the project site or in the project vicinity. Native breeding birds protected by the California Fish and Game Code (CFGF) or the Migratory Bird Treaty Act (MBTA) could nest in the existing street trees. Impact BI-2 addresses impacts to native nesting birds.

In conclusion, there are no candidate, sensitive, or special-status species on the project site, nor any known occurrences of any candidate, sensitive, or special status species in the project vicinity. Thus, implementation of the proposed project would not directly or indirectly affect any candidate, sensitive, special-status species, or any riparian habitat identified in local, regional, state, or federal plans, policies, or regulations. None of the proposed project's construction-related activities would have a substantial adverse effect on federally protected wetlands through direct removal, filling, hydrological interruption, or other means. Therefore, the proposed project would have no impact and no mitigation is necessary.

Impact BI-2: The proposed project would not substantially interfere 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. (*Less than Significant*)

Most native breeding birds are protected under Section 3503 of the CFGF, and raptors (including peregrine falcons) are protected under Section 3503.5 of the CFGF. In addition, both Section 3513 of the CFGF and the MBTA (16 U.S. Code, Sec. 703 Supp. I, 1989) prohibit the killing, possession, or trading of migratory birds. The CFGF Section 3511 allows the designation of a bird species as "fully protected"; this is a greater level of protection than afforded by the California Endangered Species Act because the "fully protected" designation means the listed

⁹⁶ Significant trees are trees within 10 feet of the lot line and have a trunk diameter greater than a foot. They also stand taller than 20 feet or have a canopy spread of 15 feet.

species cannot be taken at any time. The only species present in the vicinity of the project site that has been designated as fully protected is the American peregrine falcon (*Falco peregrinus*). Finally, Section 3800 of the CFGC prohibits the taking of non-game birds, which are defined as birds occurring naturally in California that are neither game birds nor fully protected species. Impacts on these protected species would be significant if tree removal would disturb nesting birds.

Breeding peregrine falcons have been recorded in San Francisco, notably on the roof of the PG&E building at 77 Beale Street, about 1.8 miles east of the project site. Considering the height of this nest, the distance between the proposed project and the PG&E building, and existing noise levels of San Francisco city streets, construction activities and noise associated with the proposed project would not affect peregrine falcon nesting behavior at this nest.

The *San Francisco Breeding Bird Atlas* synthesizes extensive records of avian breeding on the San Francisco Peninsula and shows a diverse assemblage of bird species breeding in San Francisco despite urbanized conditions in most areas. Native species that have been recorded in the area around the project site, defined by the atlas as “Downtown San Francisco,” include house finch (*Carpodacus mexicanus*), brown-headed cowbird (*Molothrus ater*), Brewer’s blackbird (*Euphagus cyanocephalus*), dark-eyed junco (*Junco hyemalis*), white-crowned sparrow (*Zonotrichia leucophrys*), song sparrow (*Melospiza melodia*), American robin (*Turdus migratorius*), common raven (*Corvus corax*), American crow (*Corvus brachyrhynchos*), Anna’s hummingbird (*Calypte anna*), and mourning dove (*Zenaida macroura*).⁹⁷ All of these species are capable of habituating to disturbance levels typical of an urban area and are protected by Section 3008 of the CFGC and the MBTA.

The proposed project would be required to comply with the provisions of the San Francisco Planning Code’s Green Landscaping Ordinance, which requires projects involving the construction of a new building or relocation of an existing building to install street trees. Replacement trees would be planted in compliance with Article 16 of the San Francisco Public Works Code. While the proposed project includes replacement trees and new landscaping, there would still be a short-term loss of nesting habitat as a result of tree removal and construction disturbances.

Existing street trees along the project alignment have the potential to support native nesting birds protected under Section 3008 of the CFGC or the MBTA. Removal of these trees during nesting bird season (February 1 through August 31) could result in nest destruction or injury or mortality of nestlings, which would be considered a significant impact. Compliance with the requirements of the MBTA and the CFGC would ensure that there would be no significant impact as a result of

⁹⁷ *San Francisco Breeding Bird Atlas*, June 1, 2003, accessed from <http://www.markeaton.org/sffo1/Breeding%20Ecology/San%20Francisco%20Breeding%20Bird%20Atlas.pdf>, on October 6, 2012.

tree removal and construction disturbances. These requirements may include the following actions:

- Vegetation removal activities for the proposed project will be conducted during the non-breeding season (i.e., September through February) to avoid impact to nesting birds or preconstruction surveys will be conducted for work scheduled during the breeding season (March through August).
- Preconstruction surveys will be conducted by a qualified ornithologist, authorized by the California Department of Fish and Wildlife to conduct such activities, to determine if any birds are nesting in or in the vicinity of the vegetation to be removed. The preconstruction survey will be conducted within 15 days prior to the start of work from March through May (since there is higher potential for birds to initiate nesting during this period), and within 30 days prior to the start of work from June through August.
- If an active nest is found close enough to the construction area to be disturbed by these activities, the qualified biologist, in consultation with the California Department of Fish and Wildlife, will determine the extent of a construction-free buffer zone to be established around the nest until the young have fledged.

Compliance with federal and state regulations would ensure that this impact would be less than significant.

Planning Code Section 139, Standards for Bird-Safe Buildings

The Planning Commission adopted Standards for Bird-Safe Buildings on July 14, 2011.⁹⁸ Required treatments under this ordinance are codified in Planning Code Section 139, Standards for Bird-Safe Buildings. The purpose of the standards is to establish requirements for new building construction and replacement façades to reduce bird mortality from circumstances that are known to pose a high risk to birds. The two circumstances regulated by this Planning Code Section 139 are “location-related hazards,” where the siting of a structure creates increased risk to birds, and “feature-related hazards,” which may create increased risk to birds regardless of where the structure is located.

The project site is located in a fully developed urban area, does not provide habitat for any rare or endangered species, is not located on or in the vicinity of a native wildlife nursery site, and is not located within 300 feet of the San Francisco Bay waterfront. Therefore, the proposed high-rise tower is not subject to location-related standards of Planning Code Section 139(c)(1), incorporating the Standards for Bird-Safe Buildings.

⁹⁸ San Francisco Planning Department, Standards for Bird-Safe Buildings, Adopted by the Planning Commission on July 14, 2011. Available online at http://www.sf-planning.org/ftp/files/publications_reports/bird_safe_bldgs/Standards%20for%20Bird%20Safe%20Buildings%20-%2011-30-11.pdf. Accessed September 13, 2012.

Feature-related hazards can occur throughout the City. As set forth in Planning Code Section 139(c)(2), they include free-standing glass walls, wind barriers, skywalks, balconies, and greenhouses on rooftops that have unbroken glazed segments 24 sq. ft. and larger in size. A structure that contains any such feature-related hazard, like the proposed project tower, would be required under Planning Code Section 139 to employ Bird-Safe Glazing Treatment on 100 percent of the glazing on feature-related-hazards.

Compliance with Planning Code Section 139, Standards for Bird-Safe Buildings, would ensure that the proposed project's impact on bird migration and local movement would be less than significant.

Conclusion

Since the proposed project would not impact a protected species, would be required to install street trees, would follow the statutory protections for nesting birds, and would follow the standards for bird-safe buildings, the proposed project would not interfere with the movement of any native resident or migratory wildlife or fish species, and would have a less-than-significant impact.

Impact BI-3: The proposed project would not conflict with the City's local policies or ordinances protecting biological resources, such as the tree ordinance. (*Less than Significant*)

The Planning Department, Department of Building Inspection (DBI), and Department of Public Works (DPW) have established guidelines to ensure that legislation adopted by the Board of Supervisors governing the protection of trees, including street trees, is implemented. San Francisco Public Works Code Section 8.02-8.11 requires disclosure and protection of landmark, significant, and street trees, collectively known as "protected trees" located on private and public property.

The proposed project would include redevelopment of the western part of the site with a residential tower with a fitness center and underground parking for residents, and a rebuilt fitness center pool facility south of the existing building in the eastern portion of the project site. Up to 30 trees would be removed as part of the project, including all 11 of the ginkgo trees within the project site, 1 London plane tree along Geary Boulevard, and potentially all 18 of the London plane trees along Post Street.

Nine of the ginkgo trees are significant trees. Significant trees are those trees within the jurisdiction of DPW, or trees on private property within 10 feet of the public right-of-way, that meet certain size criteria. To be considered significant, a tree must have a diameter at breast height of more than 12 inches, a height of more than 20 feet, or a canopy of more than 15 feet (Section 810A(a)). The removal of significant trees on privately owned property is subject to the requirements for the removal of street trees (discussed in the following paragraph). As part of the

determination to authorize removal of a significant tree, the Director of DPW is required to consider certain factors related to the tree, including (among others) its size, age, species, and visual, cultural, and ecological characteristics (Section 810A(c)).

None of the trees that would be removed are landmark trees, and all of the London plane trees and sycamores are street trees. The City's Urban Forestry Ordinance protects any street tree within the public right-of-way. The removal of "street trees" (trees within the public right-of-way or on land within the jurisdiction of DPW) by abutting property owners requires a permit under Article 16 of the San Francisco Public Works Code. If the Department grants a permit, it requires that replacement trees be planted (at a one-to-one ratio) or that an in-lieu fee be paid (Section 806(b)). Prior to tree removal, the project sponsor would apply to DPW for a tree removal permit, and the sponsor would comply with all requirements of the Urban Forestry Ordinance (including requirements for tree replacement or in-lieu fees). Work that takes place within the dripline of street trees that would be retained also requires protective measures to prevent impacts on retained trees.

Given the above, the proposed project would not conflict with the local tree preservation ordinance, or with any local policies or ordinances protecting trees. The proposed project would also not conflict with any other local policies or ordinances protecting other biological resources as there are no other biological resources on the project site. Thus, the proposed project would have a less-than-significant impact with regard to conflict with local ordinances and policies protecting biological resources.

Impact BI-4: The proposed project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. (*No Impact*)

No habitat conservation plans, natural community conservation plans, or other approved conservation plans apply to the project area. Therefore, the proposed project would have no impact on any approved habitat conservation plans.

Cumulative Impacts

Impact C-BI-1: The proposed project, in combination with other past, present or reasonably foreseeable future projects in the site vicinity, would not result in a considerable contribution to significant cumulative impacts to biological resources. (*Less than Significant*)

The proposed project, combined with reasonably foreseeable future projects, would result in increased population and development in the project vicinity. The project site is currently fully developed and on-site vegetation consists of ornamental trees and hedges. Similarly, wildlife species on and in the vicinity of the project site are those that have adapted to the urban environment and are able to co-exist with people and the built environment. The vegetation and

wildlife that could occur on and around the project site represent an urban environment rather than a wildland condition. No nearby development sites contain any special status species. Moreover, as development projects must comply with federal, state, and local regulations that protect biological resources, there would be no significant project-level impacts on biological resources, and no significant cumulative impact on biological resources. For these reasons, the proposed project would not have a cumulatively considerable contribution to significant cumulative impacts on biological resources, and no mitigation measures are necessary.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
14. 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.)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code, creating substantial risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Change substantially the topography or any unique geologic or physical features of the site?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Topic 14e does not apply, as the proposed project does not include the use of septic tanks or alternative wastewater disposal systems. The proposed project would connect to and would be served by the City's combined stormwater and sewer system. Therefore, this topic is not applicable to the proposed project and is not discussed below.

A *Preliminary Geotechnical Evaluation* was prepared for the project site; the results and recommendations are summarized below.⁹⁹ The purpose of this *Preliminary Geotechnical Evaluation* is to develop recommendations regarding the geotechnical aspects of project design and construction. Subsurface investigations were not performed because borings available from previous investigations of nearby sites were deemed sufficient for the proper characterization of the subsurface conditions.¹⁰⁰

The *Preliminary Geotechnical Evaluation* indicates the subsurface presence of fill, soil, and bedrock. The subsurface evaluation indicates that the site is likely underlain by approximately five feet of fill consisting of sand, clayey sand, and clay. On the western portion of the project site, the fill is likely underlain by several feet of clay and decomposed bedrock. On the eastern portion of the project site, the fill is likely underlain by up to 30 feet of poorly graded, fine grained sand, geologically referred to as Dune sand. Dune sand is typically loose where shallow and becomes dense with depth. Bedrock was encountered at a depth of approximately 12 feet below the ground surface (bgs) in a soil boring drilled approximately 50 feet northwest of the site. Bedrock was encountered at depths of 6 and 21 feet bgs in two borings drilled adjacent to the site along Geary Boulevard. The bedrock surface at this location is expected to slope down steeply toward the east, with the depth to bedrock on the eastern portion of the project site likely about 20 to 50 feet bgs. The bedrock in the site vicinity consists of serpentinite and sandstone with interbedded shale of the Franciscan formation. (See pp. 128-130 for further discussion of naturally occurring asbestos that is commonly contained within serpentinite, and applicable requirements for controlling the potential for airborne asbestos during construction.) The bedrock of the Franciscan formation is typically relatively weak and friable, intensely fractured, and highly weathered.¹⁰¹

The groundwater level in the site vicinity likely occurs between approximately 30 and 50 feet bgs; perched groundwater was encountered at a depth of about two to five feet bgs in several borings drilled adjacent to the project site to the northwest; and groundwater may also be present at the soil-bedrock interface and may flow within bedrock fractures.¹⁰² Project excavation for the proposed 1481 Post Street tower on the western half of the project site is expected to be up to 45 feet below the existing ground surface. Preliminary design recommendations indicate that the proposed structures would be constructed on mat foundations due to the depth of excavation and the potential to encounter groundwater. The foundations for the proposed structures would likely be underlain by bedrock on the western portion of the project site and by dense to very dense sand

⁹⁹ Treadwell and Rollo, *Preliminary Geotechnical Evaluation*, December 12, 2006 (hereinafter "*Preliminary Geotechnical Evaluation*"). A copy of this document is available for review at the San Francisco Planning Department, 1650 Mission Street, Suite 400 as part of Case File 2005.0679E.

¹⁰⁰ *Preliminary Geotechnical Evaluation*, p. 2.

¹⁰¹ *Preliminary Geotechnical Evaluation*, pp. 2-3.

¹⁰² *Preliminary Geotechnical Evaluation*, p. 3.

and/or bedrock on the eastern portion of the project site.¹⁰³ Approximately 83,000 cubic yards of soil would be removed from the project site.

Impact GE-1: The proposed project would not result in the exposure of persons or structures to seismically-induced geologic hazards, i.e., rupture of a known earthquake fault, strong seismic ground shaking, ground failure, and landslides. (*Less than Significant*)

Fault Rupture

The Alquist-Priolo Earthquake Fault Zoning Act's main purpose is to prevent the construction of buildings used for human occupancy on the surface trace of active faults. The project site is not located within an Alquist-Priolo Earthquake Fault Zone as established by the California Geological Survey (CGS), and no active or potentially active faults exist on or in the immediate vicinity of this site.¹⁰⁴ Therefore, the potential for surface fault rupture is low, and this impact would be less than significant.

Ground Shaking

Like the rest of the San Francisco Bay Area, the project site is subject to ground shaking in the event of an earthquake on regional fault lines. The United States Geological Survey (USGS) estimates that there is a 63 percent probability of a strong earthquake (Moment magnitude¹⁰⁵ [Mw] 6.7 or higher) occurring in the San Francisco Bay region during the 30-year period between 2007 and 2036.¹⁰⁶ The nearest faults that could cause substantial ground shaking in the project area are the San Andreas Fault, located approximately 11 miles west; the San Gregorio Fault, located approximately 17 miles west; and the Hayward Fault, located approximately 18 miles east. The Rodgers Creek Fault is 34 miles north, and the Calaveras and Mount Diablo Faults are 35 miles east of the project site.¹⁰⁷

The Association of Bay Area Governments (ABAG) has prepared maps that show areas of the City subject to ground shaking during an earthquake. The project site is in an area subject to "very strong" ground shaking from a major earthquake along the Peninsula segment of the San Andreas Fault and "strong" ground shaking from a major earthquake along the northern Hayward

¹⁰³ *Preliminary Geotechnical Evaluation*, pp. 6-7.

¹⁰⁴ California Geological Survey, Table 4, Cities and Counties Affected by Alquist-Priolo Earthquake Fault Zones as of January 2010. Available online at <http://www.consrv.ca.gov/cgs/rghm/ap/Pages/affected.aspx>. Accessed September 19, 2012.

¹⁰⁵ An earthquake is classified by the amount of energy released, expressed as the magnitude of the earthquake. Traditionally, magnitudes have been quantified using the Richter scale. However, seismologists now use a moment magnitude (Mw) scale because it provides a more accurate measurement of the size of major and great earthquakes.

¹⁰⁶ United States Geological Survey, Earthquake Hazards Program. Available online at <http://earthquake.usgs.gov/regional/nca/ucerf/>. Accessed September 19, 2012.

¹⁰⁷ *Preliminary Geotechnical Evaluation*, p. 4.

Fault, the two faults closest to the project site.¹⁰⁸ In addition, the CGS estimates that peak ground accelerations¹⁰⁹ (expressed as the acceleration due to earth's gravity in g) within the project area would be 0.507 g.¹¹⁰

Although the potential for “strong” to “very strong” seismic ground shaking is present, the intensity of earthquake ground motion in the vicinity of the project site would depend on the characteristics of the generating fault, the distance to the earthquake's epicenter, the magnitude and duration of the earthquake, and site geologic conditions. In the event of an earthquake that exhibits “strong” to “very strong” seismic ground shaking, considerable damage could occur to existing buildings on the project site, potentially injuring building occupants and neighbors. The proposed building would be designed in accordance with the site-specific recommendations determined by a site-specific design-level geotechnical investigation and would be constructed in conformance with accepted building and engineering standards, thereby ensuring the new building would withstand seismic damage from “strong” or “very strong” ground shaking. The final plans for the proposed building would be reviewed by the Department of Building Inspection (DBI), ensuring that seismically-induced ground shaking would be addressed in the building design process. DBI would also review the proposed building permit applications for compliance with the 2010 San Francisco Building Code, and for implementation of recommendations in the site-specific design-level geotechnical investigation that address seismic hazards. Damage and injury from ground shaking cannot be entirely avoided; however, adherence to current commercial and regulatory practices, including building code requirements, can reduce the potential for injury and damage. Therefore, the proposed project would not expose persons or structures to substantial adverse effects related to ground shaking and the impact would be less than significant.

Liquefaction, Lateral Spreading, and Seismic Settlement

Strong shaking during an earthquake can cause ground failure as a result of soil liquefaction, lateral spreading, or seismic settlement. Liquefaction refers to the loss of strength of saturated soils during ground shaking. Lateral spreading is horizontal ground movement of relatively flat-lying soil deposits towards a free face such as an excavation and is generally associated with liquefaction of subsurface soils at or near the bottom of an exposed surface. Seismic densification is a phenomenon in which non-saturated, cohesionless soil is densified by earthquake vibrations, causing differential settlement.

¹⁰⁸ Association of Bay Area Governments, Earthquake and Hazards Program, Hazard Maps and Information, Earthquake Shaking, Future Earthquake Shaking Scenarios, Static Shaking Maps for Future Earthquake Scenarios. Available online at <http://www.abag.ca.gov/cgi-bin/pickmapx.pl>. Accessed September 19, 2012.

¹⁰⁹ Acceleration of gravity (g) = 980 centimeters per second squared. Acceleration of 1.0 g is a rate of increase in speed equivalent to a car traveling 328 feet from rest in 4.5 seconds.

¹¹⁰ California Geological Survey, Probabilistic Seismic Hazards Mapping Ground Motion Page. Available online at <http://redirect.conservation.ca.gov/cgs/rghm/pshamap/pshamap.asp>. Accessed August 28, 2012.

The project site is not located in an area of liquefaction potential as identified in the Seismic Hazards Zone Map for the City and County of San Francisco.¹¹¹ As discussed above, a review of subsurface conditions in the project area indicates that the soil below the groundwater consists of dense sand and/or bedrock. The planned excavations would extend below the loose sands above the water table. Therefore, the potential for liquefaction and lateral spreading at the site would be low as would the potential for seismic settlement. Based on this information, the *Preliminary Geotechnical Evaluation* concludes that the potential for liquefaction, lateral spreading, and seismic settlement at the project site is low.¹¹²

To ensure compliance with all San Francisco Building Code provisions regarding structural safety, when DBI reviews the site-specific design-level geotechnical investigation and building plans for a proposed project, it will determine necessary engineering and design features for the project to reduce potential damage to structures from liquefaction, lateral spreading, and seismic settlement. DBI could require that additional site-specific soils report(s) be prepared in conjunction with the building permit applications. Therefore, potential damage to structures from geologic hazards on a project site would be minimized through the DBI requirement for a site-specific design-level geotechnical investigation and review of the building permit application pursuant to its implementation of the Building Code. Any changes incorporated into the foundation design required to meet the Building Code standards that are identified as a result of the DBI permit review process would constitute minor modifications of the project and would not require additional environmental analysis.

Therefore, the proposed excavation and building construction on the project site would result in less-than-significant impacts related to the potential for ground failure as a result of liquefaction, lateral spreading, and seismic settlement.

Seismically Induced Landslides

The project site is located at the crest of a hill; however, the site itself is relatively flat with a south to southeast grade. The project site is not located within or near an area of seismically induced landslide susceptibility as identified in the Seismic Hazards Zone Map for the City and County of San Francisco.¹¹³ Therefore, impacts related to seismically induced landslides would not be applicable.

¹¹¹ California Geological Survey, Seismic Hazards Zonation Program, City and County of San Francisco Quadrangle, November 17, 2000. Available online at http://gmw.consrv.ca.gov/shmp/download/pdf/ozn_sf.pdf. Accessed September 19, 2012.

¹¹² *Preliminary Geotechnical Evaluation*, p. 6.

¹¹³ California Geological Survey, Seismic Hazards Zonation Program, City and County of San Francisco Quadrangle, November 17, 2000. Available online at http://gmw.consrv.ca.gov/shmp/download/pdf/ozn_sf.pdf. Accessed August 28, 2012.

Impact GE-2: The proposed project would not cause soil erosion or the loss of topsoil.
(Less than Significant)

The project site is covered with impervious surfaces. Implementation of the proposed project would require excavation to a depth of about 45 feet below the existing ground surface. Soil movement for site preparation and excavation activities could create the potential for wind- and water-borne soil erosion. The project site is relatively flat even though it is located at the crest of a hill; therefore, substantial erosion would not be expected as a result of these activities. Furthermore, the construction contractor would be required to implement an erosion and sediment control plan for construction activities, in accordance with Article 4.1 of the San Francisco Public Works Code, to address sediment-laden construction-site stormwater runoff, as discussed in Initial Study topic 15e, Hydrology and Water Quality. The SFPUC must review and approve the erosion and sediment control plan prior to the plan's implementation, and the SFPUC would inspect the project site periodically to ensure compliance with the plan. Therefore, impacts related to soil erosion would be less than significant.

Impact GE-3: The proposed project would not be located on a geologic unit or soil that is unstable or that would become unstable as a result of the project construction or potentially result in on- or off-site landslides, lateral spreading, subsidence, liquefaction, or collapse.
(Less than Significant)

As discussed above, the project site is underlain by approximately five feet of fill consisting of sand, clayey sand, and clay. On the western portion of the project site, the fill is likely underlain by several feet of clay and decomposed bedrock. On the eastern portion of the project site, the fill is likely underlain by up to 30 feet of poorly graded, fine grained sand, geologically referred to as Dune sand. Dune sand is typically loose where shallow and becomes dense with depth. Bedrock was encountered at a depth of approximately 12 feet bgs in a soil boring drilled approximately 50 feet northwest of the site. Bedrock was encountered at depths of 6 and 21 feet bgs in two borings drilled adjacent to the site along Geary Boulevard.

As discussed under Impact GE-1, the potential for liquefaction, lateral spreading, seismic settlement, and landslides on the project site is low, indicating that the project site is likely not located on a geologic unit or soil that is unstable. Implementation of the proposed project would require excavation to a depth of 45 feet below the existing ground surface. The *Preliminary Geotechnical Evaluation* indicates that there is insufficient space to slope the sides of the excavation.¹¹⁴ In order to prevent slope instability and settlement, the sides of the excavation would be shored using standard engineering practices. Standard practices include adaptive management practices to adjust foundation design for any unforeseen conditions that can only become evident during construction. Therefore, any signs of slope instability not currently evident would be corrected through design and as a result, the proposed project would have a low potential for adverse effects from landslides.

¹¹⁴ *Preliminary Geotechnical Evaluation*, p. 7.

Depending on the depth of the excavations, the *Preliminary Geotechnical Evaluation* recommends rock nails, a tied-back and cantilevered soldier beam and lagging shoring system, or a tied-back secant wall using soil cement columns. When excavations go beyond 50 feet bgs, a stiffer secant wall would likely be needed to limit deflection of the shoring. Multiple rows of tiebacks would likely be required due to the depths of the excavations.¹¹⁵ The proposed excavations would extend below the foundations of existing buildings at 1333 Gough Street (on the eastern portion of the project site) and 1400 Geary Boulevard (adjacent to the west boundary of the project site). To ensure the integrity of those buildings, underpinning would be required. The *Preliminary Geotechnical Evaluation* recommends drilled, cast-in-place soldier piles, typically referred to as slant piles, as the most practical underpinning method and that lagging be used in conjunction with the slant piles to construct a wall capable of retaining the excavation walls while underpinning the existing footings. Additionally, lateral restraint, consisting of tiebacks installed beneath the buildings to be underpinned, would likely be required, and, if tiebacks cannot be installed, cross-lot bracing or rakers would likely be needed to provide the necessary lateral restraint.¹¹⁶ The project sponsor has agreed to work with the adjacent owner to the west to enter into a tie-back agreement, but if no such agreement can be obtained, the project will use an internally braced shoring system on the western portion of the site.

Preliminary design recommendations indicate that the proposed structures would be constructed on mat foundations due to the depth of excavation and the presence of groundwater. The foundations for the proposed structures would likely be underlain by bedrock on the western portion of the project site and by dense to very dense sand and/or bedrock on the eastern portion of the project site. Therefore, the potential for project construction to potentially result in on- or off-site landslides, lateral spreading, subsidence, liquefaction, or collapse would be low and this impact would be less than significant.

Additionally, as discussed under Impact GE-1, the proposed project would be required to conform to the San Francisco Building Code, which ensures the safety of all new construction in the City. As stated there, decisions about appropriate foundation design and whether additional background studies are required would be considered as part of the DBI review process. Background information provided to DBI would provide for the security and stability of adjoining properties as well as the subject property during construction. The potential damage to structures (including existing adjacent structures) from geologic hazards on the project site would be addressed through the DBI requirement for a geotechnical report and review of the building permit application pursuant to its implementation of the Building Code, ensuring that this impact would be less than significant.

¹¹⁵ *Preliminary Geotechnical Evaluation*, pp. 7-8.

¹¹⁶ *Preliminary Geotechnical Evaluation*, p. 8.

Impact GE-4: The proposed project would not be located on expansive soils creating substantial risks to life or property. (No Impact)

The City and County of San Francisco is within an area where less than 50 percent of the soil consists of clay having high swelling potential, i.e., expansive soils. Expansive soils are those that shrink or swell substantially with changes in moisture content and generally contain a high percentage of clay particles. Based on the subsurface information currently available from geotechnical investigations of nearby sites, the project site is likely predominantly underlain by sand and it is therefore unlikely that expansive clay exists at the site.¹¹⁷ Therefore, the potential for substantial risks to life or property related to the presence of expansive soils would not exist and there would be no impact.

Impact GE-5: The proposed project would not substantially alter site topography or unique geologic or physical features of the project site. (No Impact)

The project site is located in a densely developed urban area in the Western Addition neighborhood. The site is fully occupied by a 13-story residential building with below-grade parking topped with tennis courts and a swimming pool building (now closed). The proposed 36-story building with four below-grade basement levels would replace the parking structure, tennis courts, and swimming pool building on the western portion of the project site. There are no unique geologic or physical features on the project site. The proposed project would not alter the topography or change any unique geological or physical features of the project area; therefore, there would be no impact.

Cumulative Impacts

Impact C-GE-1: The proposed project, in combination with other past, present or reasonably foreseeable future projects in the site vicinity, would not result in a cumulatively considerable contribution to a significant cumulative impact on geology, soils and seismicity. (Less than Significant)

Geology impacts are generally localized and site specific and do not have cumulative effects with other projects. Reasonably foreseeable projects in the vicinity would be subject to applicable seismic standards and safety measures to reduce geologic hazards. Therefore, implementation of the proposed project would not have a cumulatively considerable contribution to significant cumulative impacts on geology, soils, and seismicity. No mitigation is necessary.

¹¹⁷ *Preliminary Geotechnical Evaluation*, p. 3.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
15. HYDROLOGY AND WATER QUALITY— Would the project:					
a) Violate any water quality standards or waste discharge requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner that would result in substantial erosion or siltation on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Otherwise substantially degrade water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h) Place within a 100-year flood hazard area structures that would impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
j) Expose people or structures to a significant risk of loss, injury or death involving inundation by seiche, tsunami, or mudflow?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

A *Preliminary Geotechnical Evaluation* was prepared for the project site. Information from that report is used in some of the responses in this section.

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*)

Construction-Related Stormwater Runoff

The proposed project's foundation system would require excavation up to a depth of approximately 45 feet below the existing ground surface. Construction activities such as grading and earthmoving operations would expose soil and could result in erosion and excess sediments carried in stormwater runoff to the combined stormwater-sewer system. In addition, stormwater runoff from temporary on-site use and storage of vehicles, fuels, wastes, and other hazardous materials could carry pollutants to the combined stormwater-sewer system if proper handling methods were not employed.

Stormwater drainage during construction would flow to the combined stormwater-sewer system and would be treated at the Southeast Water Pollution Control Plant (Southeast Plant). In accordance with Guidelines for Development of Sustainable Sites and Article 4.1 of the San Francisco Public Works Code (supplemented by San Francisco Department of Public Works Order No. 158170), which incorporates and implements the City's National Pollutant Discharge Elimination System (NPDES) permit and minimum controls described in the U.S. Environmental Protection Agency Combined Sewer Overflow Control Policy, the project sponsor would be required to prepare an erosion and sediment control plan. The Stormwater Pollution Prevention Plan (SWPPP) would specify best management practices and erosion and sediment control measures to prevent sedimentation from entering the combined stormwater-sewer system. The plan would also include measures preventing spills on the site and methods to minimize pollutant spills should they occur. The SWPPP would be reviewed and approved by the San Francisco Public Utilities Commission (SFPUC) prior to construction, and the SFPUC would conduct periodic inspections of the project site to ensure compliance with the plan. Compliance with these regulatory requirements would ensure that water quality impacts related to violation of water quality standards or degradation of water quality due to discharge of construction-related stormwater runoff would be less than significant.

Construction-Related Groundwater Dewatering

As noted in topic E.14, Geology and Soils, p. 112, previous investigations indicate that groundwater is present in the project area. As reported in the *Preliminary Geotechnical Evaluation*, the groundwater level in the site vicinity likely occurs between approximately 30 and 50 feet below ground surface (bgs); perched groundwater was encountered at a depth of about 2 to 5 feet bgs in several borings drilled adjacent to the project site to the northwest; and

groundwater may also be present at the soil-bedrock interface and may flow within bedrock fractures.¹¹⁸ Project excavation for the proposed 1481 Post Street building on the western half of the project site is expected to be up to 45 feet below the existing ground surface. Therefore, dewatering may be required as part of project excavation.

Any groundwater encountered during construction of the proposed project would be subject to requirements of the City's Industrial Waste Ordinance (Ordinance Number 199-77), requiring that groundwater discharges meet specified water quality standards before they may be discharged into the sewer system. The Bureau of Systems Planning, Environment, and Compliance of the SFPUC must be notified of projects necessitating dewatering, and may require water analysis before discharge. If groundwater dewatering is necessary, the final soils report required for the proposed project would address the potential settlement and subsidence associated with the dewatering. The report would contain a determination as to whether or not a lateral movement and settlement survey should be prepared to monitor any movement or settlement of surrounding buildings and adjacent streets. If a monitoring survey is recommended, DPW would require that a Special Inspector (as defined in Article 3 of the Building Code) be retained by the project sponsor to perform this monitoring. Long-term dewatering would not be necessary, as the underground floors would be waterproofed and built to withstand the hydrostatic pressure of the groundwater.¹¹⁹

With discharge to the combined stormwater-sewer system in accordance with regulatory requirements, water quality impacts related to violation of water quality standards or degradation of water quality due to discharge of groundwater produced during dewatering would be less than significant.

Operation

Domestic wastewater from the project site flows to the City's combined stormwater-sewer system, where it is treated to standards identified in the City's NPDES Permit for the Southeast Plant prior to discharge. During dry weather (typically May 1 to October 15), all sanitary sewage generated at the project site is treated at the Southeast Plant, which currently operates at about 80 percent of its design capacity. During wet weather (typically October 16 to April 30), the combined sewer system collects large volumes of stormwater runoff, and other facilities in the City provide additional treatment as needed before discharging treated effluent to the Bay. When combined flows exceed the total capacity of all of the facilities, excess flows receive primary treatment and are discharged through combined sewer overflow (CSO) structures located along the Bayside waterfront. These intermittent CSO discharges occur in compliance with the current NPDES permit.

¹¹⁸ *Preliminary Geotechnical Evaluation*, p. 3.

¹¹⁹ *Preliminary Geotechnical Evaluation*, p. 8.

The additional dry weather flow associated with the proposed project could be accommodated within the system's existing capacity. Discharge of typical wastewater to this existing wastewater treatment system would not violate any water quality standards or waste discharge requirements and would be within the capacity of the Southeast Plant. During wet weather, any net increase in combined sewage could cumulatively contribute to an increase in the average volume of CSO discharges to the Bay. Such an increase could be a concern because the RWQCB has designated this portion of the Bay as an impaired water body under Section 303(d) of the Clean Water Act, which indicates water quality standards are not expected to be met after implementation of technology-based effluent limitations, and because CSO discharges contain pollutants for which the Bay is impaired. However, the City is undertaking a number of measures to reduce the quantity and frequency of overflows and to improve the water quality of overflows.

In light of these efforts and the continuation of treatment of wastewater and stormwater at the Southeast Plant, as currently practiced, discharges would be made in accordance with the NPDES permit for the Southeast Plant, North Point Wet-Weather Facility, and Bayside Wet-Weather Transport/Storage and Diversion Structures, and there would be no impact related to violation of water quality standards or degradation of water quality during operation of the proposed project.

In conclusion, the potential of project construction and project operations to adversely impact water quality would be less than significant.

Impact HY-2: The proposed project would not substantially deplete groundwater supplies or interfere with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table. (*Less than Significant*)

On the basis of geologic and geophysical data, San Francisco has seven identified groundwater basins – Lobos, Marina, Downtown, Islais, South, Visitacion Valley, and Westside. The SFPUC has defined a groundwater basin as a continuous body of unconsolidated sediments and the surrounding surface drainage area.¹²⁰ The project area is over the Downtown groundwater basin. As discussed above under Impact HY-1, groundwater would be encountered at the planned excavation depths; thus, dewatering for the proposed development would be necessary. Dewatering of excavations during construction could temporarily lower groundwater levels in the project vicinity. However, any effects of groundwater dewatering would be temporary, and, once dewatering is completed, groundwater levels would return to normal. In addition, implementation of the proposed project would not increase the amount of impervious surfaces on the project site that could interfere with groundwater recharge. Thus, potential impacts related to depletion of groundwater supplies or levels would be less than significant.

¹²⁰ San Francisco Public Utilities Commission, Sewer System Master Plan Background Materials, Supplementary Report Chapter 2, pp. 2-10 to 2-12. Available online at <http://216.119.104.145/modules/showdocument.aspx?documentid=610>. Accessed August 10, 2012.

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, in a manner that would result in substantial erosion or siltation on or off site. (*Less than Significant*)

The existing drainage pattern of the site or area would not be altered as a result of project implementation. There are no surface water channels on the project site that would be affected. As discussed under Impact HY-1, a SWPPP would be developed to minimize loss of soil during construction. Therefore, the proposed project would have a less-than-significant impact on erosion or siltation on or off site, and no mitigation is necessary.

Impact HY-4: 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 flooding on or off site, or 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. (*Less than Significant*)

The project site is completely covered by impervious surfaces, does not have surface water channels, and is located outside of flood-prone areas of the City. The project sponsor would be required to reduce stormwater runoff peak rate and total volume by 25 percent in accordance with the City's Stormwater Management Ordinance (SMO). Through implementation and installation of appropriate management systems that reduce the stormwater discharge rate, retain runoff on site, or promote stormwater reuse, the proposed project would reduce the volume of stormwater and associated impacts of runoff originating from the project site.

The proposed project would not alter the existing drainage pattern of the project site or area or increase the amount of impervious surfaces on the project site. The proposed project's compliance with the SMO would reduce the existing volume and rate of stormwater runoff discharged from the project site; however, the precise type, size and routing of stormwater management systems have not yet been finalized. A more detailed hydrologic analysis would be completed during the preparation of the stormwater control plan and submitted to the SFPUC for approval with the final construction drawings to better measure the total reduction. Furthermore, compliance with the SWPPP, as discussed under Impact HY-1, would minimize the potential for spills of pollutants stored on site.

Thus, the proposed project would not substantially increase the rate or amount of surface runoff resulting in on- or off-site flooding nor would it create or contribute runoff that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. Therefore, the proposed project would have less-than-significant impacts related to altering drainage patterns, exceeding the capacity of existing or planned stormwater drainage systems, or providing a substantial additional source of polluted runoff.

Impact HY-5: The proposed project would not place housing within a 100-year flood hazard area or place structures within a 100-year flood hazard area that would impede or redirect flood flows. (*Not Applicable*)

Flood risk assessment and some flood protection projects are conducted by federal agencies including the Federal Emergency Management Agency (FEMA) and the U.S. Army Corps of Engineers (Corps). The flood management agencies and cities implement the National Flood Insurance Program (NFIP) under the jurisdiction of FEMA and its Flood Insurance Administration. Currently, the City of San Francisco does not participate in the NFIP and no flood maps are published for the City. However, FEMA is preparing Flood Insurance Rate Maps (FIRMs) for the City and County of San Francisco for the first time. FIRMs identify areas that are subject to inundation during a flood having a 1.0 percent chance of occurrence in a given year (also known as a “base flood” or “100-year flood”). FEMA refers to the floodplain that is at risk from a flood of this magnitude as a special flood hazard area. Because FEMA has not previously published a FIRM for the City and County of San Francisco, there are no identified special flood hazard areas within San Francisco’s geographic boundaries.

On June 10, 2008, legislation was introduced at the San Francisco Board of Supervisors to enact a floodplain management ordinance to govern new construction and substantial improvements in flood-prone areas of San Francisco, and to authorize the City’s participation in NFIP upon passage of the ordinance. Specifically, the proposed floodplain management ordinance includes a requirement that any new construction or substantial improvement of structures in a designated flood zone must meet the flood damage minimization requirements in the ordinance.

The City and County of San Francisco participates in the NFIP. The Mayor and Board of Supervisors approved a Floodplain Management Ordinance and prepared accompanying flood zone maps in 2008 that regulate new construction and substantial improvements to structures in flood-prone areas. The Board of Supervisors has amended the Floodplain Management Ordinance in response to FEMA’s comments.¹²¹ The project site is not located within a flood zone designated on the City’s interim floodplain map.¹²² In addition, there are no natural waterways within or near the project site that could cause stream-related flooding. Therefore, impacts related to the placement of housing or other structures in a 100-year flood hazard area would not be applicable to this project.

¹²¹ Ordinance 56-10 (2010). Available online at <http://www.sfbos.org/ftp/uploadedfiles/bdsupvrs/ordinances10/o0056-10.pdf>. Accessed August 10, 2012.

¹²² City and County of San Francisco, General Services Agency – Risk Management, Interim Floodplain Maps. Available online at <http://sfgsa.org/index.aspx?page=828>. Accessed August 10, 2012.

Impact HY-6: The proposed project would not expose people or structures to a significant risk of loss, injury, or death from flooding as a result of a levee/dam failure, or as a result of inundation by tsunami, seiche, or mudflow. (No Impact)

The project site is located on Cathedral Hill and is not located within an area that would be flooded as the result of failure of a levee or dam.¹²³ Therefore, no impact would occur.

The project site is not located within an area that is subject to inundation by seiche, tsunami, or mudflow, nor is it in an area that is subject to inundation from failure of above-ground reservoirs and water tanks.¹²⁴ Therefore, no impact would occur.

Cumulative Impacts

Impact C-HY-1: The proposed project, in combination with other past, present, or reasonably foreseeable future projects in the site vicinity, would not result in a cumulatively considerable contribution to significant cumulative impacts on water quality and hydrology. (Less than Significant)

As discussed above, the project site is located in the Downtown groundwater basin within San Francisco. Therefore, the geographic scope of potential cumulative impacts on water quality encompasses central San Francisco Bay and the Downtown groundwater basin.

As described under Impact HY-1, the project's construction activities would comply with the City's Stormwater Management Ordinance, Article 4.1 of the San Francisco Public Works Code and the City's Industrial Waste Ordinance (Ordinance Number 199-77) and would develop a site-specific SWPPP to control runoff and erosion. Adherence to the SFPUC's NPDES permit stipulations would ensure that the proposed project and all foreseeable projects in the vicinity would comply with water quality objectives. Therefore, cumulative impacts related to degradation of water quality would be less than significant.

As discussed under Impact HY-1, the proposed project would likely require dewatering during construction which would be temporary, and, once construction is completed, groundwater levels would return to normal. As further stated under Impact HY-2, implementation of the proposed project would not increase the amount impervious surfaces on the project site that could deplete or interfere with groundwater recharge. The proposed project would be subject to City regulations pertaining to stormwater runoff and dewatering. Therefore, project impacts and the

¹²³ ABAG, Dam Failure Inundation Hazard Map for San Francisco. Available online at <http://www.abag.ca.gov/cgi-bin/pickdamx.pl>. Accessed August 10, 2012.

¹²⁴ ABAG, Tsunami Inundation Map for Emergency Planning. Available online at <http://www.abag.ca.gov/bayarea/eqmaps/tsunami/tsunami.html>. Accessed August 10, 2012. San Francisco Planning Department, San Francisco General Plan Community Safety Element, Map 5 - Tsunami Hazard Zones and Map 6 - Potential Inundation Areas Due to Reservoir Failure. Available online at http://www.sf-planning.org/ftp/General_Plan/Community_Safety_Element_2012.pdf. Accessed August 10, 2012.

proposed project's contribution to cumulative impacts related to groundwater depletion would not be cumulatively considerable. No mitigation measures are necessary.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
16. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
h) Expose people or structures to a significant risk of loss, injury or death involving fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

The proposed project would not be located within an airport land use plan, within two miles of a public or public use airport, or in the vicinity of a private airstrip. Therefore, topics 16e and 16f, above, are not applicable to the proposed project.

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*)

The proposed project consists of the construction of residential, retail, fitness center, and parking uses on the project site. These uses would utilize small quantities of hazardous materials, including cleaners, solvents, paints, toners, and disinfectants. The quantity of these materials

would be too small to create a significant hazard to the public or the environment. These materials, through any reasonably foreseeable upset or accident, would not release hazardous materials into the environment in an amount that would result in a significant impact.

The use and storage of these hazardous materials would comply with Article 21 of the San Francisco Health Code, which implements the hazardous materials requirements of the California Health and Safety Code and provides for safe handling of hazardous materials in the City. In accordance with this article, any person or business that handles, sells, stores, or otherwise uses hazardous materials in quantities exceeding specified threshold amounts would be required to obtain and keep a current hazardous materials certificate of registration and to implement a hazardous materials business plan that would be submitted with the registration application.

In addition, transportation of hazardous materials is well regulated by the California Highway Patrol and the California Department of Transportation. With compliance with existing regulations, impacts related to the routine transport, use, and storage of hazardous materials would be less than significant.

Impact HZ-2: Construction of the proposed project would not create a significant hazard to the public or the environment through the release of hazardous materials. (*Less than Significant with Mitigation*)

If hazardous materials are present in the soil or groundwater that would be disturbed during construction or in building materials that would be disturbed during demolition, the project could result in a release of hazardous materials, potentially affecting public health or the environment. In addition, methane or other flammable gases, if present, could potentially cause flammable or explosive conditions. The following discussion focuses on the potential for exposure to hazardous materials in soil, groundwater, or vapors beneath the project site, and in the existing building.

Potential for Hazardous Wastes in Soil or Groundwater

Project construction would include the removal of the existing below-grade parking and excavation of soil for four subsurface levels and building foundations. Excavation would extend up to about 45 feet below the ground surface and would result in the removal of approximately 83,000 cubic yards of soil.

A Phase I Environmental Site Assessment (ESA) was completed for the project site in 2007.¹²⁵ The ESA is based on a review of prior environmental documents, interviews, a review of environmental agency databases and records, and a site reconnaissance.

Multi-family dwellings and individual houses occupied the project site from the late 1800s until the early 1960s. The 1333 Gough Street building was constructed in 1965. These uses generally would not have contributed hazardous wastes to soil or groundwater. In addition, the ESA did not identify any regulatory or physical evidence of underground storage tanks at the project site.

Currently, the project site is occupied by residences, a fitness center, and parking. The types of hazardous materials present are those typical of residential and fitness center uses. At the time of the ESA, no hazardous materials were observed other than typical cleaning and maintenance supplies.

A regulatory database review was prepared by Environmental Data Resources, Inc., and incorporated into the ESA. The review found that the project site is on the State of California's Hazardous Waste Information System (HAZNET) and the U.S. Environmental Protection Agency's Toxic Chemical Release Inventory System (TRIS) / Facility Index System (FINDS) lists for the use of asbestos-containing materials at the time of construction. A review of nearby sites indicated that none of the sites had the potential to affect the conditions at the project site.

The ESA for the project site found no evidence of potential sources of contamination in the soil or groundwater beneath the site, and concluded that no further assessment was warranted. Groundwater produced during construction dewatering would be discharged to the combined sewer system in accordance with Article 4.1 of the San Francisco Public Works Code, as supplemented by Order No. 158170, which regulates the quantity and quality of discharges to the combined sewer system. For those reasons, no significant impacts would occur due to hazardous wastes in soil or groundwater on the project site.

Naturally Occurring Asbestos

Results of subsurface investigation indicate that the project site is underlain by bedrock at a depth of approximately 6-21 feet below the existing ground surface. The bedrock in the site vicinity consists of serpentinite and sandstone interbedded shale of the Franciscan formation.¹²⁶ Serpentinite commonly contains naturally occurring chrysotile asbestos (NOA) or tremolite-actinolite, a fibrous mineral that can be hazardous to human health if airborne emissions are inhaled. In the absence of proper controls, NOA could become airborne during excavation and

¹²⁵ Property Solutions, Inc., *Phase I Environmental Assessment of Cathedral Hill Plaza, 1333 Gough Street, San Francisco, San Francisco County California, 94109*, February 20, 2007 (hereinafter ESA). This document is available for review at the San Francisco Planning Department, 1650 Mission Street, Suite 400, as part of Case File No. 2005.0679E.

¹²⁶ *Preliminary Geotechnical Evaluation*, p. 3.

handling of excavated materials. On-site workers and the public could be exposed to airborne asbestos unless appropriate control measures are implemented. Exposure to asbestos can result in health ailments such as lung cancer, mesothelioma (cancer of the lungs and abdomen), and asbestosis (scarring of lung tissues that results in constricted breathing).¹²⁷ The risk of disease depends upon the intensity and duration of exposure;¹²⁸ health risk from NOA exposure is proportional to the cumulative inhaled dose (quantity of fibers) and increases with the time since first exposure. A number of factors influence the disease-causing potency of any given asbestos (such as fiber length and width, fiber type, and fiber chemistry); however all forms are carcinogens. Although the California Air Resources Board (ARB) has not identified a safe exposure level for asbestos in residential areas, exposure to low levels of asbestos for short periods of time poses minimal risk.¹²⁹

To address health concerns from exposure to NOA, ARB enacted an Asbestos Airborne Toxic Control Measure (ATCM) for Construction, Grading, Quarrying, and Surface Mining Operations in July 2001, which became effective for projects located within the San Francisco Bay Area Air Basin (SFBAAB) on November 19, 2002. The requirements established by the Asbestos ATCM are contained in California Code of Regulations (CCR) Title 17, Section 93105,¹³⁰ and are enforced by the Bay Area Air Quality Management District (BAAQMD).

The Asbestos ATCM requires construction activities in areas where NOA is likely to be found to employ best available dust control measures. In compliance with the Asbestos ATCM, before construction, the project sponsor would be required to submit the necessary documentation to the BAAQMD to ensure compliance. The Asbestos ACTM would require the project sponsor to prepare and obtain BAAQMD approval of an asbestos dust mitigation plan. The Planning Department will send a notification letter informing the BAAQMD of proposed construction activities and the required asbestos mitigation plan. The project sponsor would be required to ensure that construction contractors comply with the Asbestos ATCM requirements to prevent airborne (fugitive) dust containing asbestos from migrating beyond property boundaries during excavation and handling of excavated materials. The measures implemented as part of asbestos dust mitigation plan would protect workers and the public and would include, but are not limited to, the following requirements:

¹²⁷ Bay Area Air Quality Management District, Asbestos Airborne Toxic Control Measure for Construction and Grading Projects, 2006. Available online at: http://www.baaqmd.gov/~media/Files/Compliance%20and%20Enforcement/Advisories/Asbestos%20ATCM/adv_080806_noa.ashx?la=en. Accessed April 15, 2013.

¹²⁸ California Air Resources Board, Naturally Occurring Asbestos, General Information, 2002. Available online at: <http://www.arb.ca.gov/toxics/Asbestos/general.htm>. Accessed April 15, 2013.

¹²⁹ California Air Resources Board, Fact Sheet #1 Health Information on Asbestos, 2002. Available online at: <http://www.arb.ca.gov/toxics/Asbestos/1health.pdf>. Accessed April 15, 2013.

¹³⁰ California Air Resources Board, Regulatory Advisory, Asbestos Airborne Toxic Control Measure for Construction, Grading, Quarrying, and Surface Mining Operations, July 29, 2002.

- Construction vehicle speed at the work site must be limited to 15 miles per hour or less;
- Prior to any ground disturbance, sufficient water must be applied to the area to be disturbed to prevent visible emissions from crossing the property line;
- Areas to be graded or excavated must be kept adequately wetted to prevent visible emissions from crossing the property line.
- Storage piles must be kept adequately wetted, treated with a chemical dust suppressant, or covered when material is not being added to or removed from the pile;
- Equipment must be washed down before moving from the property onto a paved public road; and
- Visible track-out on the paved public road must be cleaned using wet sweep or a HEPA filter equipped vacuum device within twenty-four (24) hours.

In addition, the BAAQMD may require the project sponsor or a qualified third party consultant to conduct air monitoring for offsite and onsite migration of asbestos dust during construction activities and to modify the dust mitigation plan on the basis of the air monitoring results if necessary.

Furthermore, the proposed project would be required to prepare a dust control plan in compliance with Article 22B, Construction Dust Control Ordinance, of the San Francisco Health Code, as described in Impact AQ-1. The measures required pursuant to the Dust Control Plan would also control fugitive dust that may contain asbestos. Dust suppression activities required by the Construction Dust Control Ordinance 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. Reclaimed water must be used if required by Article 21, Section 1100 et seq. of the San Francisco Public Works Code. If not required, reclaimed water should be used whenever possible. Contractors shall provide as much water as necessary to control dust (without creating run-off in any area of land clearing, and/or earth movement). 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 materials, 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. Therefore, compliance with the California Code of Regulations, Title 17, Section 93105 and Article 22B would ensure that the proposed project does not result in a significant hazard to the public or environment from exposure to NOA and the proposed project would result in a less-than-significant impact. No mitigation is necessary.

Potential Impacts Related to Building Materials

The proposed project would involve demolition and removal of the existing pool building (now closed), tennis courts, and most of the parking on the project site. The project also would involve renovation and expansion of the existing fitness center. The following discussion addresses impacts related to the potential presence of hazardous substances in building materials, based on information contained in the ESA.

Lead-Based Paint

Given the age of the existing structures (which were built in 1965), lead-based paint may be present. The ESA refers to a 2004 Phase I Environmental Site Assessment for the project site that included a field screening for lead-based paint. During the field screening, 15 chemical reaction swab tests were conducted. None of the tests indicated the presence of lead at the project site. Because the presence of lead-based paint cannot be conclusively ruled out, however, the following discussion assumes some is likely to be found on the site.

Work that could result in the disturbance of lead paint must comply with Section 3407 of the San Francisco Building Code, Work Practices for Exterior 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 December 31, 1978, Chapter 34, Section 3407 requires specific notification and work standards, and identifies prohibited work methods and penalties.

Section 3407 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 childcare centers. There are no specific requirements in Section 3407 for removal of interior lead-based paint for other types of building uses. The project contractor would use best management practices in removing lead-based paint, if encountered. Removal and disposal of building materials that contain lead-based paint would be conducted under regulations for transport and disposal of hazardous waste. Therefore, project-related impacts related to lead-based paint would be less than significant.

Section 3407 also includes notification requirements and requirements for signs. Prior to commencement of work, the responsible party must provide written notice to the Director of the Department of Building Inspection (DBI) of the address and location of the project; the scope of work including specific location; 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 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. The code contains provisions regarding inspection and sampling for compliance by DBI, and

enforcement, and describes penalties for non-compliance. Compliance with these regulations and procedures required by the San Francisco Building Code would ensure that potential impacts related to the demolition and renovation of structures with lead-based paint are less than significant.

Asbestos-Containing Building Materials

The ESA refers to the use of asbestos-containing materials at the time of construction of the 1333 Gough Street building. The study included a preliminary review for the presence of suspected asbestos-containing materials but did not include testing. Materials suspected or presumed to contain asbestos include vinyl floor tile and associated mastic; drywall; and popcorn-textured ceilings. The removal of asbestos-containing materials could generate debris that would have to be handled according to existing regulations.

Section 19827.5 of the California Health and Safety Code, adopted January 1, 1991, 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 BAAQMD is vested by the California legislature with authority to regulate airborne pollutants, including asbestos, through both inspection and law enforcement, and is to be notified 10 days in advance of any proposed demolition or abatement work.

Notification includes the names and addresses of operations and persons responsible; description and location of the structure to be demolished/alterd including size, age and prior use, and the approximate amount of friable asbestos; scheduled starting and completion dates of demolition or abatement; nature of planned work and methods to be employed; procedures to be employed to meet BAAQMD requirements; and the name and location of the waste disposal site to be used. The BAAQMD randomly inspects asbestos removal operations. In addition, the BAAQMD will inspect any removal operation for which a complaint has been received.

The local office of the State Occupational Safety and Health Administration must be notified of asbestos abatement to be carried out. Asbestos abatement contractors must follow state regulations contained in Title 8, Sections 341.6 through 341.14, and Section 1529 of the California Code of Regulations where there is asbestos-related work involving 100 square feet or more of asbestos-containing material. Asbestos removal contractors must be certified as such by the Contractors Licensing Board of the State of California. 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 in Sacramento. The contractor and hauler of the material are required to file a Hazardous Waste Manifest which details the hauling of the material from the site and its disposal. Pursuant to California law, DBI would not issue the required permit until the applicant has complied with the notice requirements described above.

Other Hazardous Building Materials

Electrical power to the project site is directed through a Pacific Gas & Electric (PG&E) transformer located in a storage vault in the parking garage. PG&E has confirmed that the transformer does not contain polychlorinated biphenyls (PCBs). The ESA does not note any PCB-containing electrical equipment at the project site. In addition, the building manager has confirmed that there are no fluorescent light fixtures with PCB-containing oils present in the existing structures.¹³¹ For those reasons, there would be no potential impacts related to the presence of PCBs on the project site.

Other potentially hazardous building materials could pose health risks for construction workers if not properly handled or disposed of, which would be a significant impact. However, implementation of Mitigation Measure M-HZ-2: Hazardous Building Materials Abatement, presented below, would require that the presence of such materials be evaluated prior to demolition or renovation and, if such materials are present, that they be properly handled during removal and building demolition or renovation. This would reduce the potential impacts of exposure to these hazardous building materials to a less-than-significant level.

Mitigation Measure M-HZ-2: Hazardous Building Materials Abatement

The project sponsor shall ensure that any building or structure planned for demolition or renovation is surveyed for hazardous building materials. These materials shall be removed and properly disposed of prior to the start of demolition or renovation. Any other hazardous building materials identified either before or during demolition or renovation shall be abated according to federal, state, and local laws and regulations.

For the reasons discussed above, including the implementation of Mitigation Measure M-HZ-2, the proposed project's impacts related to lead-based paint, asbestos or other hazardous materials in buildings to be demolished would be reduced to less-than-significant levels.

Impact HZ-3: The proposed project would not emit hazardous emissions or handle acutely hazardous materials, substances, or waste within a quarter-mile of a school. (*Less than Significant*)

At least one school (Rosa Parks Elementary) is within one-quarter mile of the project site. The proposed project would introduce residential and retail uses to the project site, and it would retain and expand the existing fitness center and parking uses. These uses would not involve the handling of acutely hazardous materials, substances, or waste or the emissions of hazardous materials during project operation. As discussed above in Impact HZ-1, the transport, use, and disposal of hazardous materials and hazardous waste during demolition and construction activities would be regulated and conducted under the requirements of DBI, which would ensure that hazardous materials related to demolition and construction at the project site would not be

¹³¹ Linda Corso, General Manager, 1333 Gough Street, personal communication, February 13, 2007.

released to the environment. Thus, the proposed project's impacts related to potential exposure of school-aged children at nearby schools to hazardous substances would be less than significant, and no mitigation is necessary.

Impact HZ-4: The proposed project would not be located on a site that is included on a list of hazardous materials sites which could result in a significant hazard to the public or the environment. (*Less than Significant*)

The proposed project is not located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 (the Hazardous Waste and Substances Sites List (or Cortese List)).¹³² As discussed under Impact HZ-2, on p. 128, the project site is on the State of California's HAZNET list and the U.S. Environmental Protection Agency's TRIS / FINDS lists for the use of asbestos-containing materials at the time of construction.

Implementation of Mitigation Measure M-HZ-2, in addition to compliance with state and local regulations and procedures, would ensure that any potential impacts related to asbestos or other hazardous materials would be reduced to a less-than-significant level. Therefore, the proposed project would have a less-than-significant impact.

Impact HZ-5: The proposed project would not impair or interfere with implementation of an adopted emergency response or evacuation plan or expose people to a significant risk of loss, injury, or death involving fires. (*Less than Significant*)

The proposed project would not substantially change the existing traffic circulation network in the vicinity. Removing the existing driveway entrance/exit on Geary Boulevard and adding driveway entrances and exits on Post Street would not substantially affect traffic circulation or reduce emergency access to the project site.

Occupants of the proposed 1481 Post Street building would contribute to congestion if an emergency evacuation of the proposed project tower or the Cathedral Hill area were required. Section 12.202(e)(1) of the San Francisco Fire Code requires that all owners of high-rise buildings (over 75 feet) "shall establish or cause to be established procedures to be followed in case of fire or other emergencies. All such procedures shall be reviewed and approved by the chief of division." 1333 Gough Street already has emergency procedures in place; these procedures would be modified to include the proposed project and submitted to the SFFD division chief for review. Additionally, San Francisco ensures fire safety primarily through provisions of the Building Code and the Fire Code. The proposed project would be required to comply with these provisions, which include additional life-safety protections for high-rise buildings. Based on the foregoing, project impacts related to emergency access response and evacuation planning would be less than significant.

¹³² California Department of Toxic Substances Control website, <http://www.envirostor.dtsc.ca.gov>, accessed September 26, 2012.

Cumulative Impacts

Impact C-HZ-1: The proposed project, in combination with other past, present or reasonably foreseeable future projects in the site vicinity, would not result in a considerable contribution to significant cumulative impacts related to hazards and hazardous materials. (*Less than Significant*)

As discussed under Impacts HZ-1 through HZ-5, implementation of the proposed project would result in less-than-significant impacts related to the use, transport, or handling of hazardous materials during demolition and construction, and would not have hazard-related impacts during project operation. Hazardous material impacts typically occur in a local or site-specific context versus a cumulative context combined with other projects. Reasonably foreseeable cumulative residential projects within a quarter mile of the project site would be subject to the same regulatory oversight as the proposed project. This includes regulatory requirements for transporting hazardous materials, or disposing of hazardous waste. Hazardous waste and medical waste generated by the Cathedral Hill CPMC Campus medical facility would be handled, transported, and disposed of in compliance with state and federal law, as applicable, under the local supervision of the San Francisco Department of Public Health (DPH) Hazardous Materials Unified Program Agency. Compliance with applicable regulations would minimize the cumulative projects' potential to expose persons and the environment to hazardous materials. The proposed project, in combination with other foreseeable projects, would not result in a significant cumulative impact related to hazards and hazardous materials. The proposed project would not make a cumulatively considerable contribution to a significant cumulative impact related to hazards and hazardous materials. This impact would be less than significant.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
17. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Encourage activities which result in the use of large amounts of fuel, water, or energy, or use these in a wasteful manner?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Impact ME-1: The proposed project would not result in the loss of availability of a known mineral resource or a locally important mineral resource recovery site. (*No Impact*)

All land in the City and County of San Francisco, including the project site, is an urbanized area and is designated as Mineral Resource Zone 4 (MRZ-4) by the California Division of Mines and Geology (CDMG) under the Surface Mining and Reclamation Act of 1975.¹³³ This designation signifies that there is inadequate information available for assignment to any other MRZ, and the project site is not a designated area of significant mineral deposits. Since the project site does not contain any known mineral resources, the proposed project would not adversely affect mineral resources, either directly or indirectly. Moreover, the proposed project would not 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. The implementation of the proposed project would not result in the loss of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan. Therefore, there would be no impact on mineral resources, and no mitigation is necessary.

Impact ME-2: The proposed project would not encourage activities which result in the use of large amounts of fuel, water, or energy, or use these in a wasteful manner. (*Less than Significant*)

Construction of the proposed project would require electricity to operate construction equipment such as hand tools and lighting. Construction vehicles and equipment would primarily use diesel fuel, and construction workers would use gasoline, diesel, and electricity to travel to the site. Energy and fuel use during construction would not be expected to be wasteful, as such use would unnecessarily add to construction costs.

The *San Francisco General Plan* contains objectives and policies aimed at reducing energy consumption that would be implemented for the proposed project, including the requirement for the proposed project to meet basic standards established in the Green Building Ordinance with respect to energy and water use. Title 24 of the California Code of Regulations, the California Building Code, requires projects involving the remodeling of existing buildings to meet certain energy and water conservation standards, including implementation of practices such as installation of energy-efficient lighting (including light emitting diode), and low-flow toilets.

Because implementation of the proposed project would meet or exceed current state and local codes concerning energy consumption requirements, and because the proposed project would meet or exceed the standards in the City's Green Building Ordinance (the project sponsor intends to seek LEED Gold certification), there would be less-than-significant impacts on energy resources, and no mitigation is necessary.

¹³³ California Division of Mines and Geology (CDMG), Open File Report 96 03 and Special Report 146 Parts I and II, 1986.

Cumulative Impacts

Impact C-ME-1: The proposed project, in combination with other past, present or reasonably foreseeable projects in the site vicinity, would not result in a cumulatively considerable contribution to significant impacts related to energy and mineral resources. (*Less than Significant*)

As discussed in Impact ME-1, above, no known minerals exist at the project site, and therefore the proposed project would not contribute to cumulative impacts on mineral resources.

In December 2002, the City adopted the *Electricity Resource Plan*, which includes implementation steps for strategies to maximize energy efficiency, develop renewable power, and ensure reliable power. In response to the Board of Supervisors' guidance in its 2009 Ordinance 94-09, San Francisco Public Utilities Commission staff have developed an updated *Electricity Resource Plan*.¹³⁴ This update identifies proposed recommendations to work towards achieving the broad policy goals laid out in the 2002 Plan.

These efforts, together with conservation, will be part of the statewide effort to achieve energy sufficiency. The project-generated demand for electricity would be negligible in the context of overall demand within San Francisco and the state, and would not in and of itself require a major expansion of power facilities. Therefore, implementation of the proposed project, in combination with past, present or reasonably foreseeable projects in the project site vicinity, would not result in any cumulatively considerable contribution to a significant cumulative impact on mineral and energy resources, either directly or indirectly. No mitigation measures are necessary.

<u>Topics:</u>	<u>Potentially Significant Impact</u>	<u>Less Than Significant with Mitigation Incorporated</u>	<u>Less Than Significant Impact</u>	<u>No Impact</u>	<u>Not Applicable</u>
18. AGRICULTURE AND FOREST RESOURCES: In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.					
—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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

¹³⁴ San Francisco Public Utilities Commission, *San Francisco's Updated Electricity Resource Plan*, Draft, March 2011, Executive Summary, pp. 1-20.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Impact AF-1: The proposed project would not convert farmland or forest land to non-farm or non-forest use, nor would it conflict with existing zoning for agricultural uses or forest land. (No Impact)

The project site is located within a developed and wholly urbanized area of San Francisco. The California Department of Conservation's Farmland Mapping and Monitoring Program identifies the site and all of San Francisco as "Urban and Built-up Land."¹³⁵ There are no farmlands or forest land identified in San Francisco; thus, the project site has no agriculture and forest resources. Because the project site does not include agricultural uses and is not zoned for such uses, the proposed project would not convert any Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use. The proposed project would not conflict with existing zoning for agricultural uses or a Williamson Act contract. Also, the proposed project would not conflict with existing zoning for forest land or timberland (as defined by Public Resources Code Sections 12220(g) and 4526, respectively) or result in the rezoning of forest land or timberland. Further, the proposed project would not involve other changes to the existing environment that could result in conversion of farmland or forest use to non-forest use. Therefore, there would less-than-significant impacts with respect to agricultural and forest resources, and no mitigation is necessary.

¹³⁵ California Department of Conservation, Farmland Mapping and Monitoring Program, *Bay Area Region Important Farmland 2004 and Urbanization 1984 – 2004*. Available at ftp://ftp.consrv.ca.gov/dlrp/fmmp/pdf/_change/_urban_change1984_2004.pdf. Accessed on July 26, 2012.

Cumulative Impacts

Impact C-AF-1: The proposed project, in combination with other past, present and reasonably foreseeable future projects in the vicinity, would not result in a cumulatively considerable contribution to a significant cumulative impact on agricultural resources or forest land or timberland. (No Impact)

As discussed above, there are no existing agricultural or forest uses on the project site or in the project vicinity, nor is there any zoning related to agricultural or forest uses, nor are any such uses anticipated. The proposed project would not result in land use conflicts related to agricultural and forest related land uses. Therefore, there would be no cumulatively considerable contribution to a significant cumulative impact with respect to agricultural or forest resources, and no mitigation is necessary.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
19. 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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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.)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Have environmental effects that would cause substantial adverse effects on human beings, either directly or indirectly?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

The EIR will address potential impacts, including cumulative impacts, related to the environmental topics of Land Use, Aesthetics, Transportation and Circulation, Noise, Air Quality, and Wind and Shadow. These topics, along with Compatibility with Existing Zoning and Plans and Policies, will be evaluated in an EIR prepared for the proposed project.

F. MITIGATION MEASURES AND IMPROVEMENT MEASURES

The project sponsor has agreed to implement the following mitigation measures which would reduce potentially significant impacts related to archaeological resources, paleontological resources, and hazardous building materials to a less-than-significant level.

Mitigation Measure M-CP-2: Archaeological Testing, Monitoring, Data Recovery and Reporting

Based on a reasonable presumption that archaeological resources may be present within the project site, 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 archaeological consultant from the pool of qualified archaeological consultants maintained by the Planning Department archaeologist. The archaeological consultant shall undertake an archaeological testing program as specified herein. In addition, the consultant shall be available to conduct an archaeological monitoring and/or data recovery program if required pursuant to this measure. The archaeological consultant's work shall be conducted in accordance with this measure and with the requirements of the project archaeological research design and treatment plan (*Archeo-Tec, Archaeological Research Design and Treatment Plan for the 1333 Gough Street at Post Project*, June 2007) at the direction of the Environmental Review Officer (ERO). In instances of inconsistency between the requirement of the project archaeological research design and treatment plan and of this archaeological mitigation measure, the requirements of this archaeological mitigation measure shall prevail. 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. Archaeological 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 archaeological resource as defined in CEQA Guidelines Sect. 15064.5 (a) and (c).

Consultation with Descendant Communities

On discovery of an archaeological site¹³⁶ associated with descendant Native Americans or the Overseas Chinese an appropriate representative¹³⁷ of the descendant group and the ERO shall be contacted. The representative of the descendant group shall be given the opportunity to monitor archaeological field investigations of the site and to consult with ERO regarding appropriate archaeological treatment of the site, of recovered data from the site, and, if applicable, any interpretative treatment of the associated archaeological site. A copy of the Final Archaeological Resources Report shall be provided to the representative of the descendant group.

¹³⁶ The term "archaeological site" is intended here to minimally include any archaeological deposit, feature, burial, or evidence of burial.

¹³⁷ 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.

Archaeological Testing Program

The archaeological consultant shall prepare and submit to the ERO for review and approval an archaeological testing plan (ATP). The archaeological testing program shall be conducted in accordance with the approved ATP. The ATP shall identify the property types of the expected archaeological 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 archaeological testing program will be to determine to the extent possible the presence or absence of archaeological resources and to identify and to evaluate whether any archaeological resource encountered on the site constitutes an historical resource under CEQA.

At the completion of the archaeological testing program, the archaeological consultant shall submit a written report of the findings to the ERO. If based on the archaeological testing program the archaeological consultant finds that significant archaeological resources may be present, the ERO in consultation with the archaeological consultant shall determine if additional measures are warranted. Additional measures that may be undertaken include additional archaeological testing, archaeological monitoring, and/or an archaeological data recovery program. If the ERO determines that a significant archaeological resource is present and that the resource could be adversely affected by the proposed project, at the discretion of the project sponsor either:

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

Archaeological Monitoring Program

If the ERO in consultation with the archaeological consultant determines that an archaeological monitoring program (AMP) shall be implemented the archaeological monitoring program shall minimally include the following provisions:

- The archaeological 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 archaeological consultant shall determine what project activities shall be archaeologically monitored. In most cases, any soils-disturbing activities, such as demolition, foundation removal, excavation, grading, utilities installation, foundation work, driving of piles (foundation, shoring, etc.), site remediation, etc., shall require archaeological monitoring because of the risk these activities pose to potential archaeological resources and to their depositional context;
- The archaeological 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 archaeological resource;
- The archaeological monitor(s) shall be present on the project site according to a schedule agreed upon by the archaeological consultant and the ERO until the ERO has, in consultation with project archaeological consultant, determined that project construction activities could have no effects on significant archaeological deposits;
- The archaeological monitor shall record and be authorized to collect soil samples and artifactual/ecofactual material as warranted for analysis;

- If an intact archaeological deposit is encountered, all soils-disturbing activities in the vicinity of the deposit shall cease. The archaeological monitor shall be empowered to temporarily redirect demolition/excavation/pile driving/construction activities and equipment until the deposit is evaluated. If in the case of pile driving activity (foundation, shoring, etc.), the archaeological monitor has cause to believe that the pile driving activity may affect an archaeological resource, the pile driving activity shall be terminated until an appropriate evaluation of the resource has been made in consultation with the ERO. The archaeological consultant shall immediately notify the ERO of the encountered archaeological deposit. The archaeological consultant shall make a reasonable effort to assess the identity, integrity, and significance of the encountered archaeological deposit, and present the findings of this assessment to the ERO.

Whether or not significant archaeological resources are encountered, the archaeological consultant shall submit a written report of the findings of the monitoring program to the ERO.

Archaeological Data Recovery Program

If the ERO, in consultation with the archaeological consultant, determines that archaeological data recovery programs shall be implemented, the archaeological data recovery program shall be conducted in accord with an archaeological data recovery plan (ADRP). The archaeological consultant, project sponsor, and ERO shall meet and consult on the scope of the ADRP prior to preparation of a draft ADRP. The archaeological 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 archaeological 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 archaeological resources if nondestructive methods are practical.

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 archaeological data recovery program.
- *Security Measures.* Recommended security measures to protect the archaeological resource from vandalism, looting, and non-intentionally damaging activities.
- *Final Report.* Description of proposed report format and distribution of results.
- *Curation.* Description of the procedures and recommendations for the curation of any recovered data having potential research value, identification of appropriate curation facilities, and a summary of the accession policies of the curation facilities.

Human Remains and Associated or Unassociated Funerary Objects

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

Final Archaeological Resources Report

The archaeological consultant shall submit a Draft Final Archaeological Resources Report (FARR) to the ERO that evaluates the historical significance of any discovered archaeological resource and describes the archaeological and historical research methods employed in the archaeological testing/monitoring/data recovery program(s) undertaken. Information that may put at risk any archaeological 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 Archaeological Site Survey Northwest Information Center (NWIC) shall receive one (1) copy and the ERO shall receive a copy of the transmittal of the FARR to the NWIC. The Environmental Planning division of the Planning Department shall receive one bound, one unbound and one unlocked, searchable PDF copy on CD of the FARR along with copies of any formal site recordation forms (CA DPR 523 series) and/or documentation for nomination to the National Register of Historic Places/California Register of Historical Resources. In instances of high public interest 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-CP-3: Paleontological Resources Monitoring and Mitigation Program

The project sponsor shall retain the services of a qualified paleontological consultant having expertise in California paleontology to design and implement a Paleontological Resources Monitoring and Mitigation Program. The PRMMP shall include a description of when and where construction monitoring would be required; emergency discovery procedures; sampling and data recovery procedures; procedure for the preparation, identification, analysis, and curation of fossil specimens and data recovered; preconstruction coordination procedures; and procedures for reporting the results of the monitoring program.

The PRMMP shall be consistent with the Society for Vertebrate Paleontology Standard Guidelines for the mitigation of construction-related adverse impacts to paleontological resources and the requirements of the designated repository for any fossils collected. During construction, earth-moving activities shall be monitored by a qualified paleontological consultant having expertise in California paleontology in the areas where these activities have the potential to disturb previously undisturbed native sediment or sedimentary rocks. Monitoring need not be conducted in areas where the ground has been previously disturbed,

in areas of artificial fill, in areas underlain by nonsedimentary rocks, or in areas where exposed sediment would be buried, but otherwise undisturbed.

The consultant's work shall be conducted in accordance with this measure and at the direction of the City's ERO. Plans and reports prepared by the consultant 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. Paleontological monitoring and/or data recovery programs required by this measure could suspend construction of the proposed project for as short a duration as reasonably possible and in no event for more than 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 potential effects on a significant paleontological resource as previously defined to a less-than-significant level.

Mitigation Measure M-HZ-2: Hazardous Building Materials Abatement

The project sponsor shall ensure that any building or structure planned for demolition or renovation is surveyed for hazardous building materials. These materials shall be removed and properly disposed of prior to the start of demolition or renovation. Any other hazardous building materials identified either before or during demolition or renovation shall be abated according to federal, state, and local laws and regulations.

G. PUBLIC NOTICE AND COMMENT

Concurrently with this Initial Study, the San Francisco Planning Department has issued a Notice of Preparation (NOP) of an Environmental Impact Report (EIR) for the 1333 Gough Street/1481 Post Street Project. Together, the NOP and this Initial Study are called the NOP/Initial Study. The NOP/Initial Study (or a Notice of Availability of a NOP/Initial Study) is sent to owners of properties within 300 feet of the project site, neighborhood organizations, and other interested parties. Publication of the NOP/Initial Study initiates a 30-day public review and comment period. Comments received on the NOP/Initial Study will be considered in preparation of the EIR analysis.

Previous project proposals have been presented and discussed at community meetings held by the project sponsor. A number of community concerns expressed regarding previous proposals involve the following: the compatibility of the proposed project with neighborhood planning in Japantown; the height, density and intensity of the proposed project; how the proposed project would relate to the street; the types of public amenities that would be incorporated into the proposed project, such as publicly accessible open space and pedestrian passage through the block; project tower separation between the existing Sequoias residential building and the proposed project; affordable housing; and parking.

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.



Sarah B. Jones
Acting Environmental Review Officer
for
John Rahaim
Director of Planning

DATE June 12, 2013

I. INITIAL STUDY PREPARERS

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APPENDIX B: WIND STUDY TABLES

Table B.1: Wind Comfort Analysis

Existing Conditions Configuration				Proposed Project Configuration				Proposed Project Plus Cumulative Configuration			
Location Number	Comfort Criterion (mph)	Wind Speed Exceeded 10% of Time (mph)	Percent of Time Wind Speed Exceeds 11 mph	Wind Speed Exceeded 10% of Time (mph)	Percent of Time Wind Speed Exceeds 11 mph	Speed Change Relative to Existing (mph)	Exceeds	Wind Speed Exceeded 10% of Time (mph)	Percent of Time Wind Speed Exceeds 11 mph	Speed Change Relative to Existing (mph)	Exceeds
1	11	12	13%	e	14	22%	2	14	22%	2	e
2	11	11	10%		10	5%	-1	10	6%	-1	
3	11	13	19%	e	14	21%	1	14	22%	1	e
4	11	11	10%		12	15%	1	11	10%	0	
5	11	10	7%		11	10%	1	11	10%	1	
6	11	11	10%		13	17%	2	13	16%	2	e
7	11	8	2%		8	2%	0	8	2%	0	
8	11	15	28%	e	16	29%	1	16	30%	1	e
9	11	13	20%	e	13	18%	0	13	18%	0	e
10	N/A	N/A	N/A		10	5%	10	10	5%	10	
11	N/A	N/A	N/A		17	32%	17	17	32%	17	e
12	N/A	N/A	N/A		14	20%	14	13	19%	13	e
13	11	13	20%	e	9	4%	-4	10	5%	-3	
14	11	15	23%	e	11	10%	-4	11	10%	-4	
15	11	13	19%	e	15	29%	2	15	29%	2	e
16	11	9	4%		9	3%	0	8	2%	-1	
17	11	13	19%	e	11	10%	-2	11	10%	-2	

ADMINISTRATIVE DRAFT – SUBJECT TO CHANGE

Appendix B: Wind Study Tables
Table B.1: Wind Comfort Analysis

Existing Conditions Configuration				Proposed Project Configuration				Proposed Project Plus Cumulative Configuration			
Location Number	Comfort Criterion (mph)	Wind Speed Exceeded 10% of Time (mph)	Percent of Time Wind Speed Exceeds 11 mph	Wind Speed Exceeded 10% of Time (mph)	Percent of Time Wind Speed Exceeds 11 mph	Speed Change Relative to Existing (mph)	Exceeds	Wind Speed Exceeded 10% of Time (mph)	Percent of Time Wind Speed Exceeds 11 mph	Speed Change Relative to Existing (mph)	Exceeds
18	11	8	2%	9	3%	1		9	3%	1	
19	11	12	16%	12	16%	0	e	12	17%	0	e
20	11	9	4%	9	4%	0		10	5%	1	
21	11	11	10%	12	12%	1	e	12	13%	1	e
22	11	8	1%	8	1%	0		9	2%	1	
23	11	8	1%	9	2%	1		8	1%	0	
24	11	12	12%	11	10%	-1		11	10%	-1	
25	11	13	17%	12	14%	-1	e	12	13%	-1	e
26	11	12	15%	12	13%	0	e	12	13%	0	e
27	11	11	10%	10	8%	-1		10	8%	-1	
28	11	15	29%	16	29%	1	e	16	29%	1	e
29	11	12	17%	11	10%	-1	e	12	13%	0	e
30	11	11	10%	11	10%	0		11	10%	0	
31	11	9	4%	9	4%	0		10	4%	1	
32	11	9	3%	9	4%	0		9	3%	0	
33	11	10	6%	10	7%	0		10	7%	0	
34	11	11	10%	11	10%	0		11	10%	0	
35	11	10	5%	9	2%	-1		9	4%	-1	

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Appendix B: Wind Study Tables
Table B.1: Wind Comfort Analysis

Existing Conditions Configuration				Proposed Project Configuration				Proposed Project Plus Cumulative Configuration			
Location Number	Comfort Criterion (mph)	Wind Speed Exceeded 10% of Time (mph)	Percent of Time Wind Speed Exceeds 11 mph	Wind Speed Exceeded 10% of Time (mph)	Percent of Time Wind Speed Exceeds 11 mph	Speed Change Relative to Existing (mph)	Exceeds	Wind Speed Exceeded 10% of Time (mph)	Percent of Time Wind Speed Exceeds 11 mph	Speed Change Relative to Existing (mph)	Exceeds
36	11	11	10%	10	7%	-1		10	6%	-1	
37	11	14	26%	13	19%	-1	e	13	18%	-1	e
38	11	15	29%	14	26%	-1	e	14	24%	-1	e
39	11	11	10%	11	10%	0		11	10%	0	
40	11	12	13%	11	10%	-1		11	10%	-1	
41	11	10	6%	10	6%	0		13	20%	3	e
42	11	12	15%	11	10%	-1		12	16%	0	e
43	11	18	39%	16	33%	-2	e	16	32%	-2	e
44	11	21	46%	20	42%	-1	e	20	42%	-1	e
45	11	16	33%	15	26%	-1	e	15	27%	-1	e
46	11	13	22%	13	19%	0	e	13	19%	0	e
47	11	14	23%	13	21%	-1	e	13	21%	-1	e
48	11	15	28%	15	27%	0	e	15	27%	0	e
49	11	12	16%	12	17%	0	e	12	16%	0	e
50	11	10	7%	10	6%	0		10	7%	0	
51	11	11	10%	12	13%	1	e	12	13%	1	e
52	11	18	40%	19	44%	1	e	19	45%	1	e
53	11	11	10%	12	14%	1	e	12	15%	1	e

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Appendix B: Wind Study Tables
Table B.1: Wind Comfort Analysis

Existing Conditions Configuration				Proposed Project Configuration			Proposed Project Plus Cumulative Configuration			
Location Number	Comfort Criterion (mph)	Wind Speed Exceeded 10% of Time (mph)	Percent of Time Wind Speed Exceeds 11 mph	Wind Speed Exceeded 10% of Time (mph)	Percent of Time Wind Speed Exceeds 11 mph	Speed Change Relative to Existing (mph)	Wind Speed Exceeded 10% of Time (mph)	Percent of Time Wind Speed Exceeds 11 mph	Speed Change Relative to Existing (mph)	Exceeds
54	11	15	25%	e	16	29%	1	29%	1	e
55	11	15	27%	e	16	30%	1	31%	1	e
56	11	13	18%	e	12	16%	-1	17%	-1	e
57	11	16	27%	e	15	25%	-1	26%	-1	e
Average mph		12.2			12.2					
Exceedances			30 of 54							30 of 57
										32 of 57

Note: In the “Exceeds” column, an “e” indicates that the measured wind speed exceeds the pedestrian comfort criterion, and a blank indicates that the measured wind speed does not exceed the pedestrian comfort criterion.

ADMINISTRATIVE DRAFT – SUBJECT TO CHANGE

July 16, 2014

Case No. 2005.0679E

B-4

1333 Gough Street/1481 Post Street Project
Print Check Draft

Table B.2: Wind Hazard Analysis

Existing Conditions Configuration					Proposed Project Configuration					Proposed Project Plus Cumulative Configuration				
Location Number	Hazard Criterion (mph)	Wind Speed Exceeded 1 Hour per Year (mph)	Hours per Year Wind		Exceeds	Wind Speed Exceeded 1 Hour per Year (mph)	Hours per Year Wind		Exceeds	Wind Speed Exceeded 1 Hour per Year (mph)	Hours per Year Wind		Exceeds	
			Speed	Exceeds Hazard Criterion			Speed	Exceeds Hazard Criterion			Speed	Exceeds Hazard Criterion		
1	36	21	0	0		25	0	0		25	0	0		
2	36	19	0	0		18	0	0		18	0	0		
3	36	24	0	0		26	0	0		26	0	0		
4	36	21	0	0		22	0	0		23	0	0		
5	36	20	0	0		22	0	0		23	0	0		
6	36	20	0	0		27	0	0		27	0	0		
7	36	16	0	0		17	0	0		18	0	0		
8	36	31	0	0		32	0	0		34	0	0		
9	36	31	0	0		26	0	0		26	0	0		
10	36	N/A	0	0		19	0	0		19	0	0		
11	36	N/A	0	0		34	0	0		35	0	0		
12	36	N/A	0	0		26	0	0		26	0	0		
13	36	25	0	0		17	0	0		18	0	0		
14	36	31	0	0		24	0	0		24	0	0		
15	36	23	0	0		31	0	0		30	0	0		
16	36	17	0	0		16	0	0		16	0	0		
17	36	28	0	0		24	0	0		24	0	0		

ADMINISTRATIVE DRAFT – SUBJECT TO CHANGE

Appendix B: Wind Study Tables
Table B.2: Wind Hazard Analysis

Existing Conditions Configuration					Proposed Project Configuration					Proposed Project Plus Cumulative Configuration				
Location Number	Hazard Criterion (mph)	Wind Speed Exceeded 1 Hour per Year (mph)	Hours per Year Wind Speed Exceeds Hazard Criterion	Exceeds	Wind Speed Exceeded 1 Hour per Year (mph)	Hours per Year Wind Speed Exceeds Hazard Criterion	Hours Change Relative to Existing	Exceeds	Wind Speed Exceeded 1 Hour per Year (mph)	Hours per Year Wind Speed Exceeds Hazard Criterion	Hours Change Relative to Existing	Exceeds	Wind Speed Exceeded 1 Hour per Year (mph)	Hours per Year Wind Speed Exceeds Hazard Criterion
18	36	16	0		17	0	0		17	0	0		17	0
19	36	22	0		23	0	0		23	0	0		23	0
20	36	18	0		18	0	0		18	0	0		18	0
21	36	25	0		25	0	0		26	0	0		26	0
22	36	15	0		15	0	0		16	0	0		16	0
23	36	14	0		15	0	0		15	0	0		15	0
24	36	26	0		27	0	0		26	0	0		26	0
25	36	24	0		22	0	0		22	0	0		22	0
26	36	23	0		21	0	0		21	0	0		21	0
27	36	21	0		22	0	0		21	0	0		21	0
28	36	29	0		30	0	0		29	0	0		29	0
29	36	22	0		21	0	0		22	0	0		22	0
30	36	20	0		20	0	0		21	0	0		21	0
31	36	17	0		17	0	0		17	0	0		17	0
32	36	18	0		19	0	0		18	0	0		18	0
33	36	22	0		22	0	0		22	0	0		22	0
34	36	20	0		21	0	0		21	0	0		21	0
35	36	18	0		17	0	0		18	0	0		18	0

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Appendix B: Wind Study Tables
Table B.2: Wind Hazard Analysis

Existing Conditions Configuration					Proposed Project Configuration					Proposed Project Plus Cumulative Configuration				
Location Number	Hazard Criterion (mph)	Wind Speed Exceeded 1 Hour per Year (mph)	Hours per Year Wind		Exceeds	Wind Speed Exceeded 1 Hour per Year (mph)	Hours per Year Wind		Exceeds	Wind Speed Exceeded 1 Hour per Year (mph)	Hours per Year Wind		Exceeds	
			Speed	Hazard			Speed	Hazard			Speed	Hazard		Speed
36	36	21	0	0		20	0	0		20	0	0		
37	36	27	0	0		24	0	0		24	0	0		
38	36	29	0	0		30	0	0		29	0	0		
39	36	20	0	0		21	0	0		21	0	0		
40	36	20	0	0		20	0	0		19	0	0		
41	36	18	0	0		18	0	0		24	0	0		
42	36	21	0	0		21	0	0		22	0	0		
43	36	30	0	0		28	0	0		28	0	0		
44	36	36	0	0		34	0	0		34	0	0		
45	36	28	0	0		27	0	0		27	0	0		
46	36	28	0	0		23	0	0		23	0	0		
47	36	24	0	0		24	0	0		23	0	0		
48	36	29	0	0		29	0	0		29	0	0		
49	36	21	0	0		24	0	0		23	0	0		
50	36	19	0	0		19	0	0		19	0	0		
51	36	20	0	0		22	0	0		21	0	0		
52	36	34	0	0		35	0	0		34	0	0		
53	36	25	0	0		28	0	0		28	0	0		

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Appendix B: Wind Study Tables
Table B.2: Wind Hazard Analysis

Existing Conditions Configuration					Proposed Project Configuration					Proposed Project Plus Cumulative Configuration				
Location Number	Hazard Criterion (mph)	Wind Speed Exceeded 1 Hour per Year (mph)	Hours per Year Wind Speed Exceeds Hazard Criterion	Exceeds	Wind Speed Exceeded 1 Hour per Year (mph)	Hours per Year Wind Speed Exceeds Hazard Criterion	Hours Change Relative to Existing	Exceeds		Wind Speed Exceeded 1 Hour per Year (mph)	Hours per Year Wind Speed Exceeds Hazard Criterion	Hours Change Relative to Existing	Exceeds	
54	36	34	0		34	0	0			34	0	0		
55	36	30	0		34	0	0			31	0	0		
56	36	23	0		22	0	0			22	0	0		
57	36	31	0		32	0	0			32	0	0		
Average mph and total hours		23.4	0		23.6	0	0			23.7	0	0		
Exceedances				0 of 54				0 of 57						0 of 57

Note: In the “Exceeds” column, an “e” indicates that the measured wind speed exceeds the wind hazard criterion, and a blank indicates that the measured wind speed does not exceed the wind hazard criterion.

ADMINISTRATIVE DRAFT – SUBJECT TO CHANGE

PLACE
POSTAGE
HERE

Michael Jacinto
San Francisco Planning Department
Environmental Planning Division
1650 Mission Street, Suite 400
San Francisco, CA 94103

PLEASE CUT ALONG DOTTED LINES

PLEASE RETURN THIS POSTCARD TO REQUEST A COPY OF
THE FINAL ENVIRONMENTAL IMPACT REPORT

(NOTE THAT THE DRAFT EIR PLUS THE RESPONSES TO COMMENTS
DOCUMENT CONSTITUTE THE FINAL EIR)

REQUEST FOR FINAL ENVIRONMENTAL IMPACT REPORT

Planning Department Case No. 2005.0679E

1333 Gough Street/1481 Post Street Project

Check one box: ☐ Please send me a copy of the Final EIR on CD-ROM.
 ☐ Please send me a paper copy of the Final EIR.

Signed: _____

Name: _____

Street: _____

City: _____ State: _____ Zip: _____
