



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

TABLE OF CONTENTS

Section	Page
ACRONYMS AND ABBREVIATIONS.....	iii
A. PROJECT DESCRIPTION	1
B. PROJECT SETTING	29
C. COMPATIBILITY WITH EXISTING ZONING AND PLANS.....	33
D. SUMMARY OF ENVIRONMENTAL EFFECTS	40
E. EVALUATION OF ENVIRONMENTAL EFFECTS.....	43
1. Land Use and Land Use Planning	43
2. Aesthetics	45
3. Population and Housing	47
4. Cultural and Paleontological Resources.....	53
5. Transportation and Circulation.....	65
6. Noise.....	66
7. Air Quality.....	68
8. Greenhouse Gas Emissions	70
9. Wind and Shadow	86
10. Recreation.....	88
11. Utilities and Service Systems	92
12. Public Services	100
13. Biological Resources	104
14. Geology and Soils	111
15. Hydrology and Water Quality	119
16. Hazards and Hazardous Materials	126
17. Mineral and Energy Resources.....	135
18. Agricultural and Forest Resources	137
19. Mandatory Findings of Significance	139
F. MITIGATION MEASURES AND IMPROVEMENT MEASURES.....	140
G. PUBLIC NOTICE AND COMMENT	144
H. DETERMINATION	145
I. INITIAL STUDY PREPARERS.....	146

LIST OF FIGURES

Figure 1: Project Location.....	2
Figure 2: Existing Site Plan.....	4
Figure 3: Proposed Ground Floor Plan.....	8
Figure 4: Proposed 2 nd Floor Plan	9
Figure 5: Proposed Representative 3 rd Floor through 29 th Floor Tower Plan.....	10
Figure 6: Proposed Representative 30 th Floor through 32 nd Floor Tower Plan	11
Figure 7: Proposed Representative 33 rd Floor through 35 th Floor Tower Plan.....	12

Figure 8:	Proposed Representative 36 th Floor Tower Plan.....	13
Figure 9:	Proposed Mechanical and Penthouse Plan.....	14
Figure 10:	Proposed North (Post Street) Elevation	16
Figure 11:	Proposed East and West Elevations.....	17
Figure 12:	Proposed South (Geary Boulevard) Elevation.....	18
Figure 13:	Proposed Basement Level 1 Parking Plan	22
Figure 14:	Proposed Basement Level 2 Parking Plan	23
Figure 15:	Proposed Basement Levels 3 and 4 Parking Plan.....	24
Figure 16:	Curb Cut Project Variant	27
Figure 17:	Project Block Context Plan.....	31

LIST OF TABLES

Table 1:	Existing Uses on the Project Site	3
Table 2	Summary of Existing and Proposed Uses on the Project Site.....	6
Table 3:	GHG Reductions from the AB 32 Scoping Plan Sectors	73
Table 4:	Regulations Applicable to the Proposed Project.....	78

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
CFGF	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.

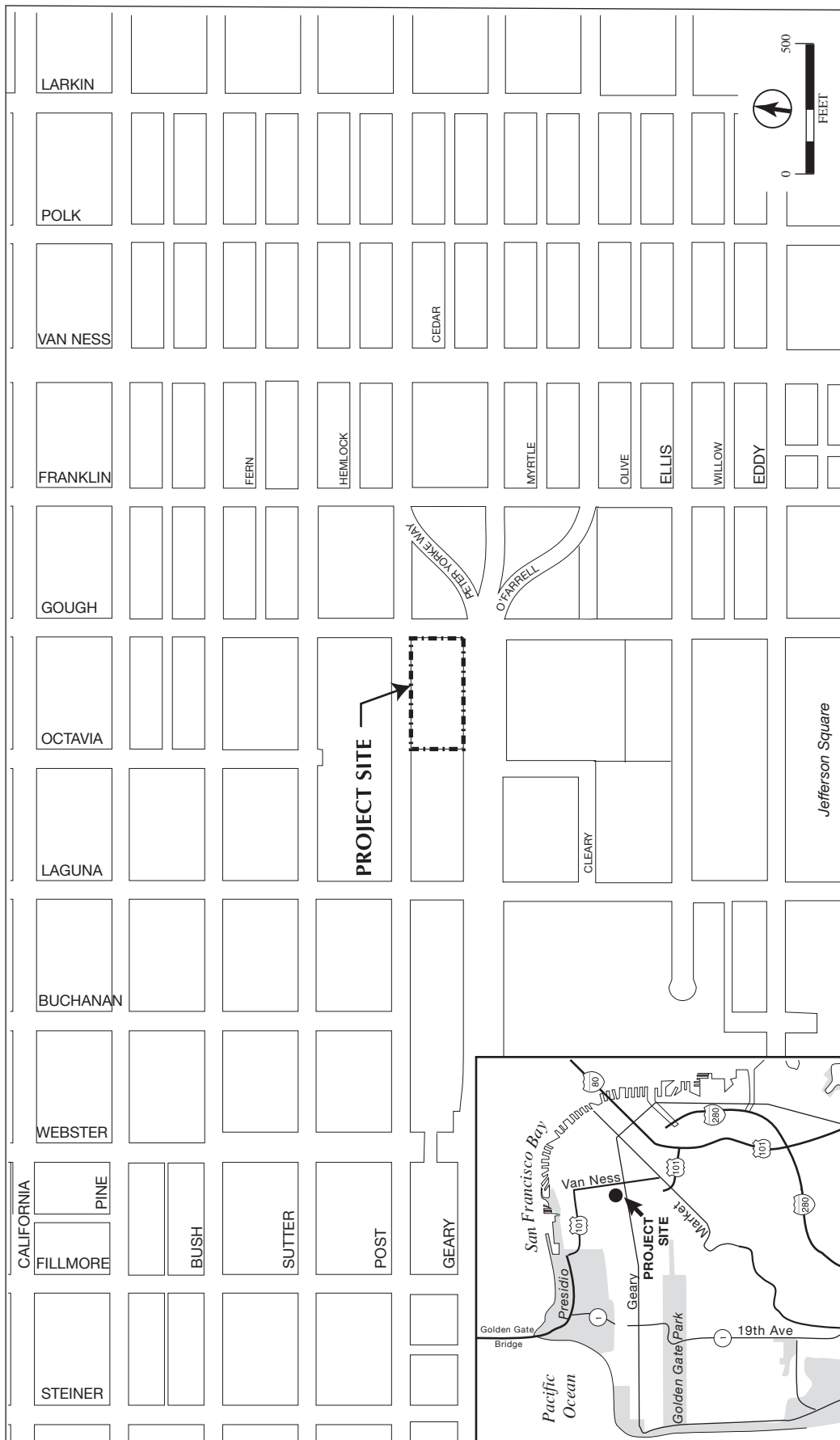


FIGURE 1: PROJECT LOCATION

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

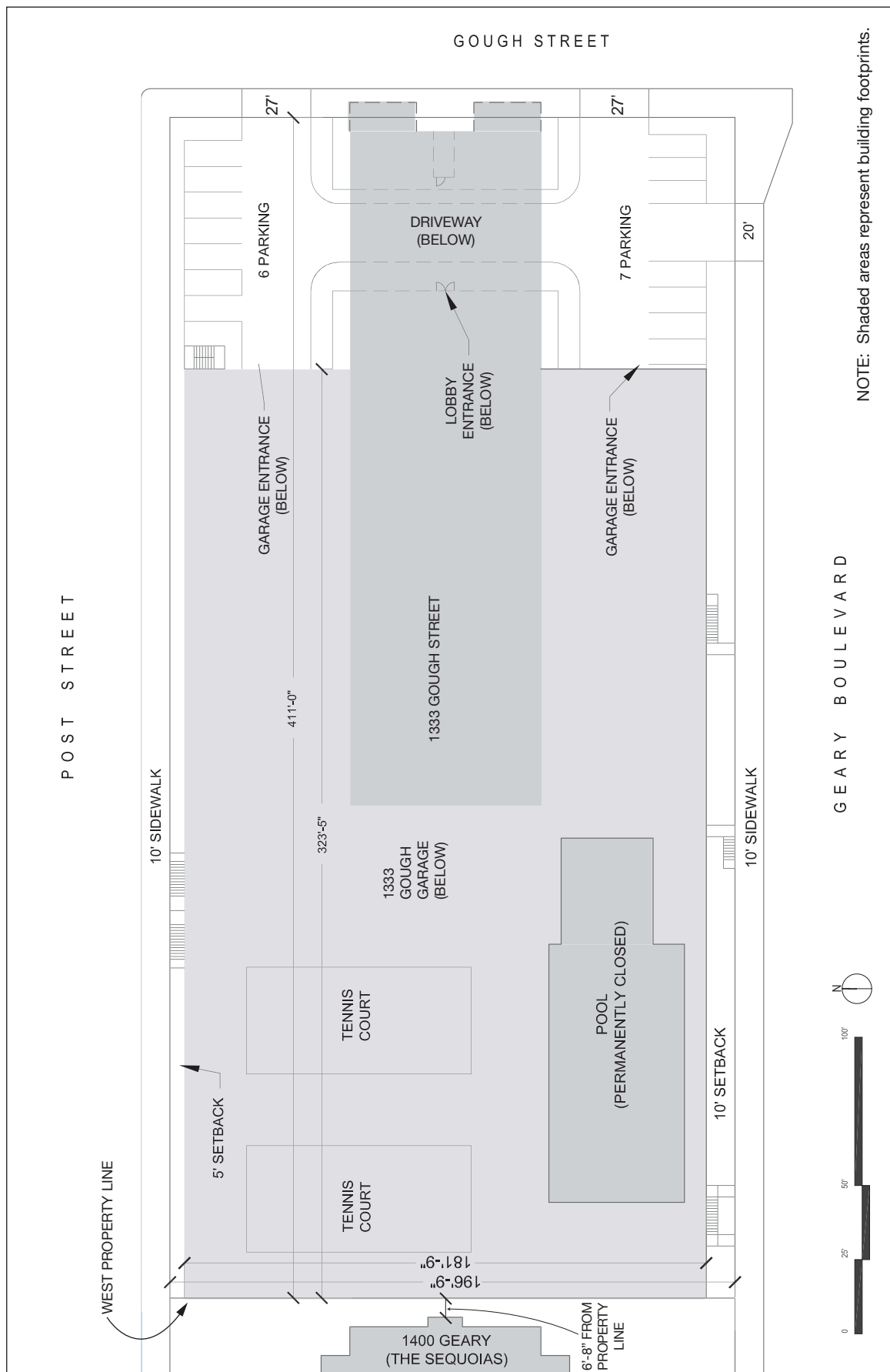
The eastern portion of the project site is currently occupied by a 169-unit, 14-story (about 138-foot-tall), 214,400-gsf apartment building (1333 Gough Street), constructed in 1965 under the former Western Addition A-1 Redevelopment Plan. The existing building contains about 188,900 gsf of residential 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.



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.)

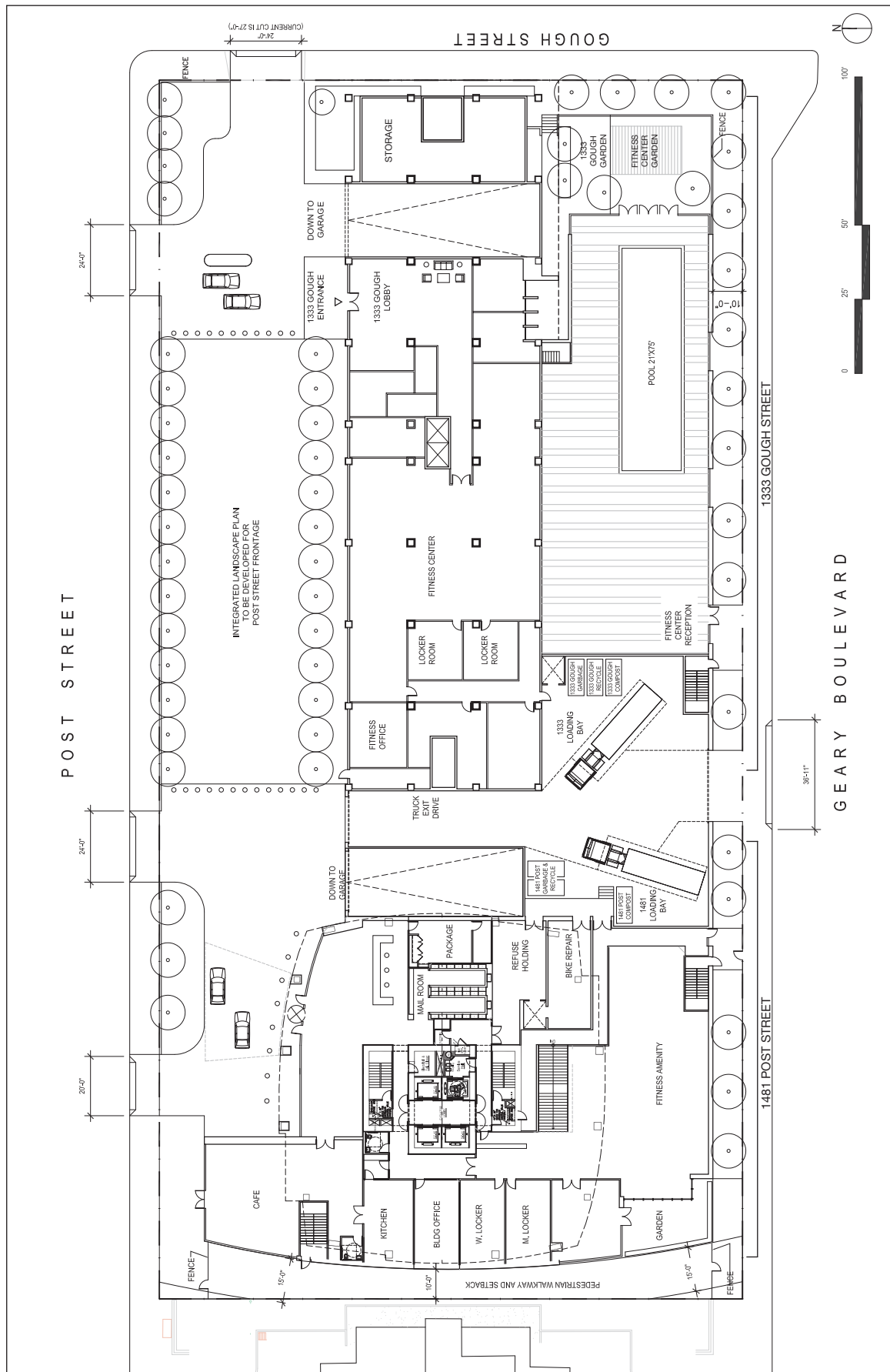
Residential units would be located on the 3rd through the 36th floors. (See Figure 5: Proposed Representative 3rd Floor through 29th Floor Tower Plan; Figure 6: Proposed Representative 30th Floor through 32nd Floor Tower Plan; Figure 7: Proposed Representative 33rd Floor through 35th Floor Tower Plan; 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.

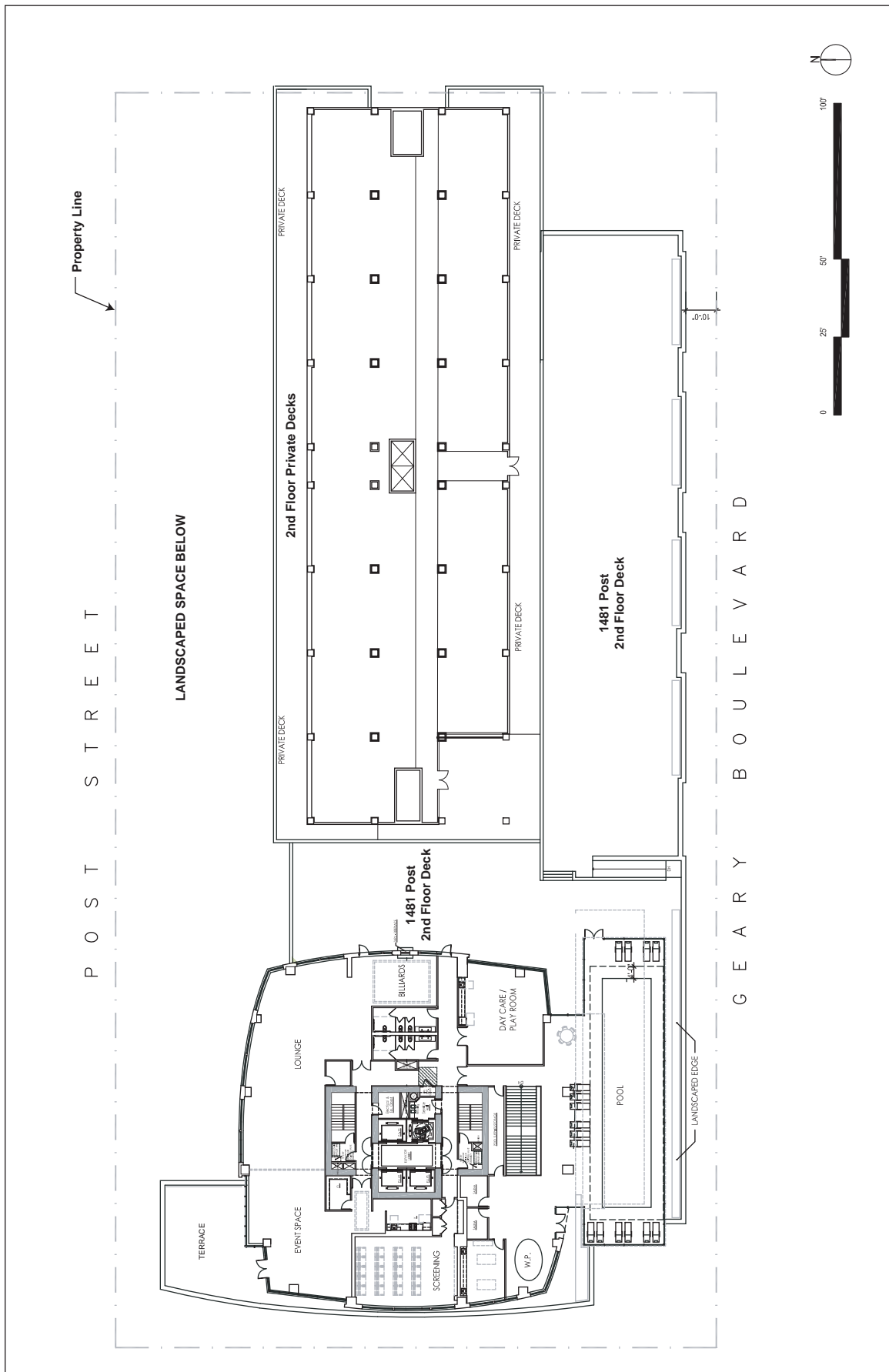


SOURCES: SLICE Architects / MWA Architects

1333 GOUGH STREET/1481 POST STREET

2005.0679E

FIGURE 3: PROPOSED GROUND FLOOR PLAN

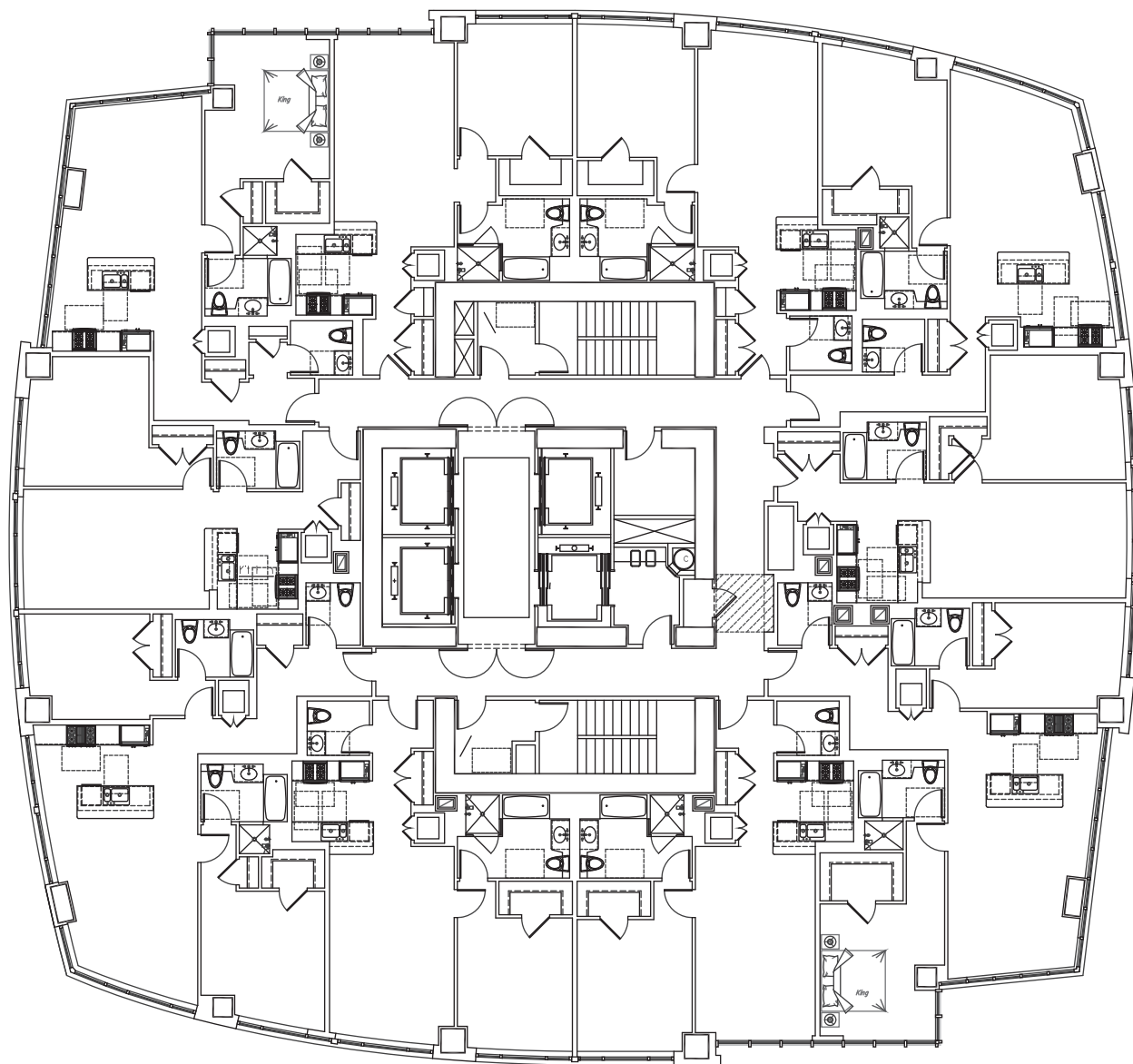


SOURCES: SLCE Architects / MWA Architects

1333 GOUGH STREET/1481 POST STREET

2005.0679E

FIGURE 4: PROPOSED 2ND FLOOR PLAN

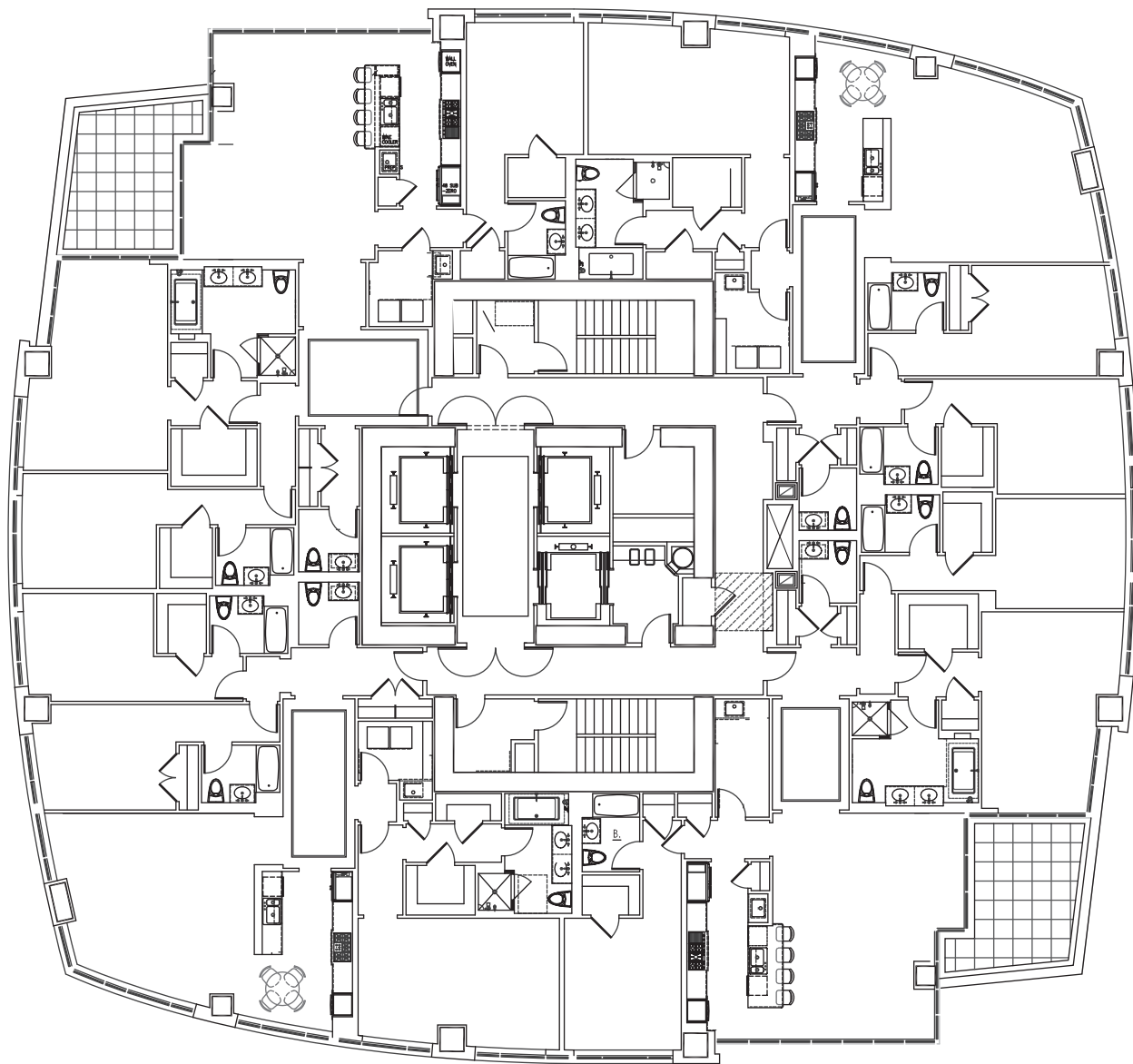


SOURCES: SLCE Architects / MWA Architects

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2005.0679E

**FIGURE 5: PROPOSED REPRESENTATIVE 3RD FLOOR
THROUGH 29TH FLOOR TOWER PLAN**

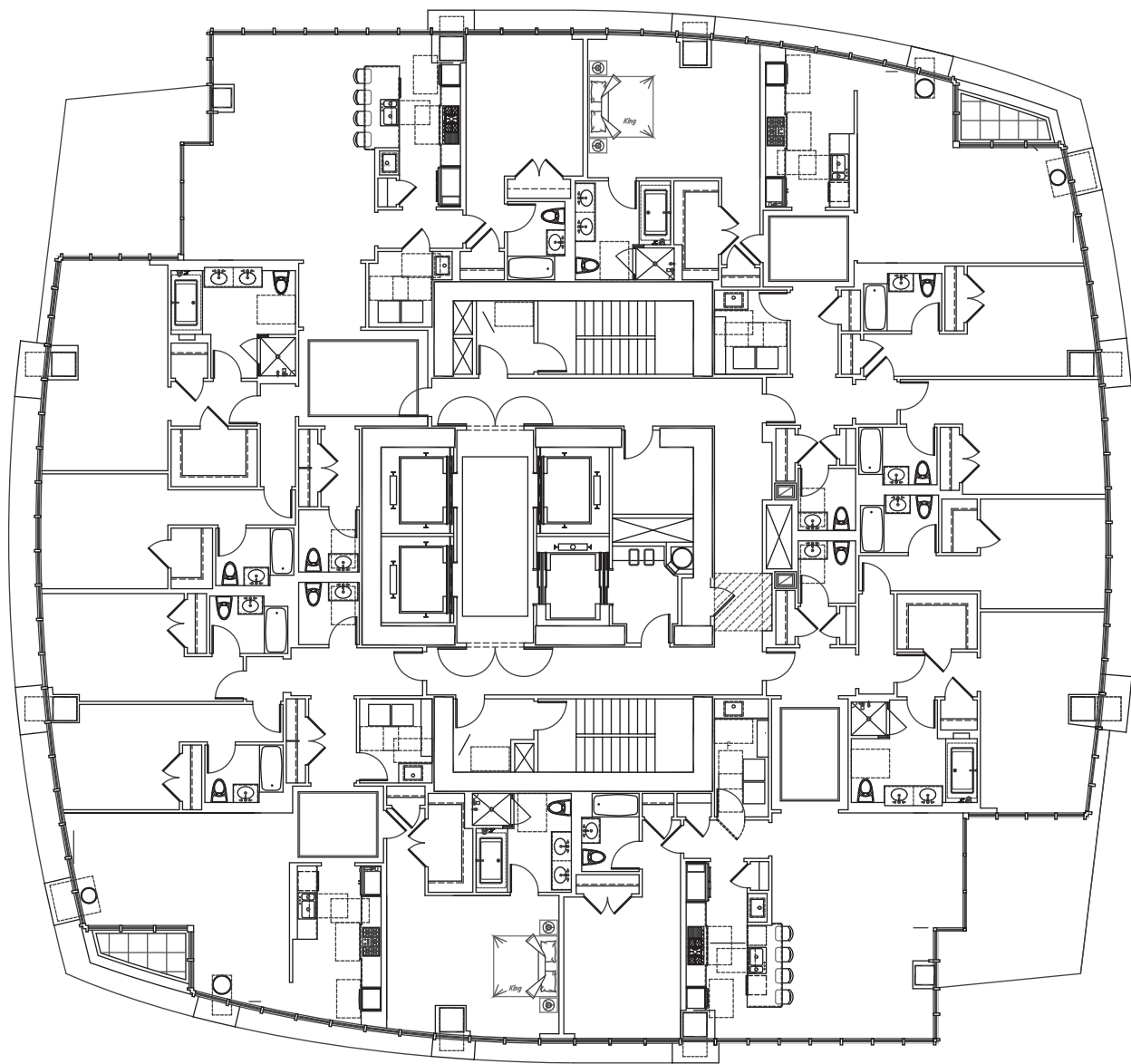


SOURCES: SLCE Architects / MWA Architects

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**FIGURE 6: PROPOSED REPRESENTATIVE 30TH FLOOR
THROUGH 32TH FLOOR TOWER PLAN**

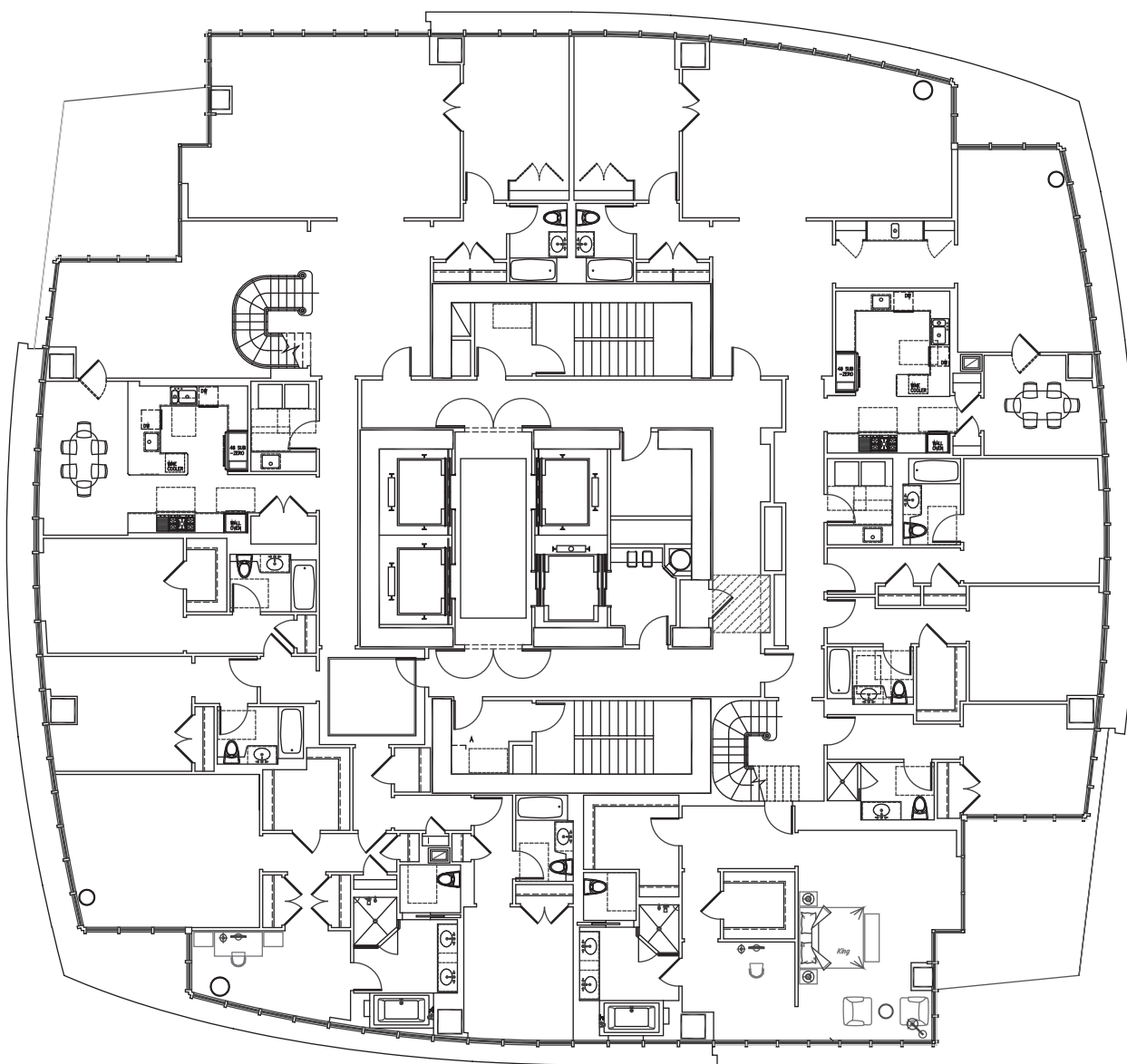


SOURCES: SLCE Architects / MWA Architects

1333 GOUGH STREET/1481 POST STREET

2005.0679E

**FIGURE 7: PROPOSED REPRESENTATIVE 33RD FLOOR
THROUGH 35TH FLOOR TOWER PLAN**

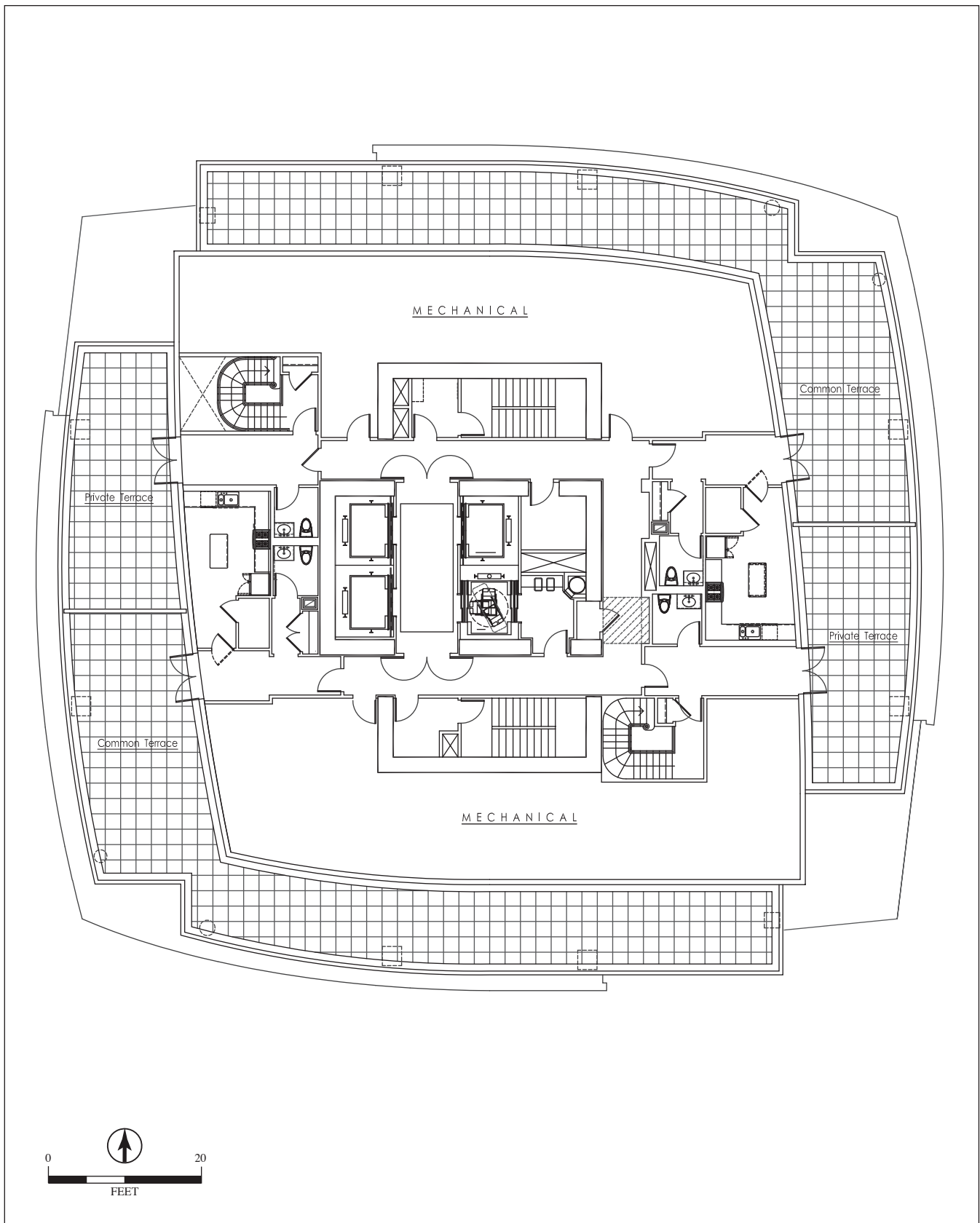


SOURCES: SLCE Architects / MWA Architects

1333 GOUGH STREET/1481 POST STREET

2005.0679E

**FIGURE 8: PROPOSED REPRESENTATIVE
36TH FLOOR TOWER PLAN**



SOURCES: SLCE Architects / MWA Architects

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2005.0679E

**FIGURE 9: PROPOSED MECHANICAL
AND PENTHOUSE PLAN**

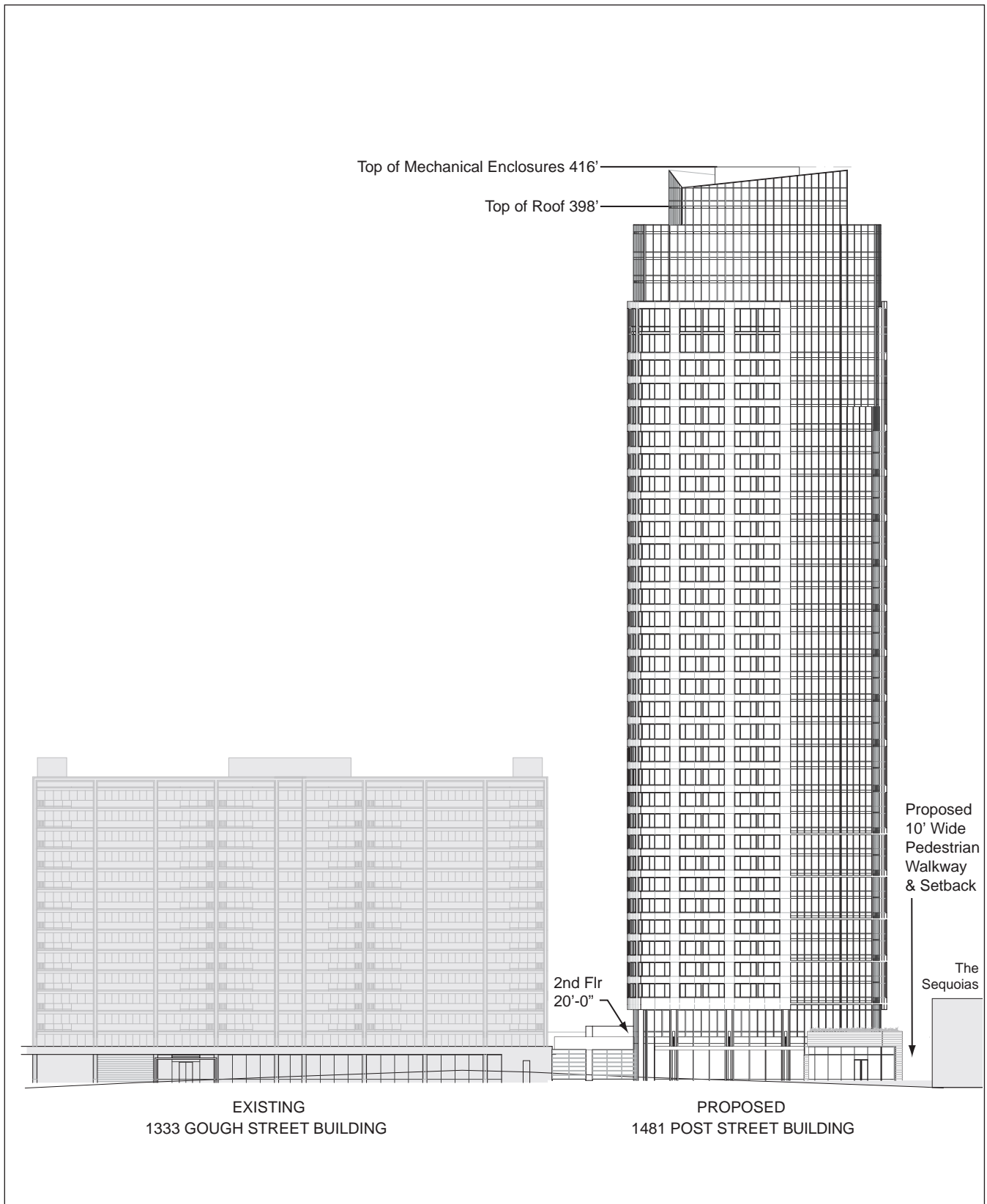
Proposed 1481 Post Street Building Form and Design

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

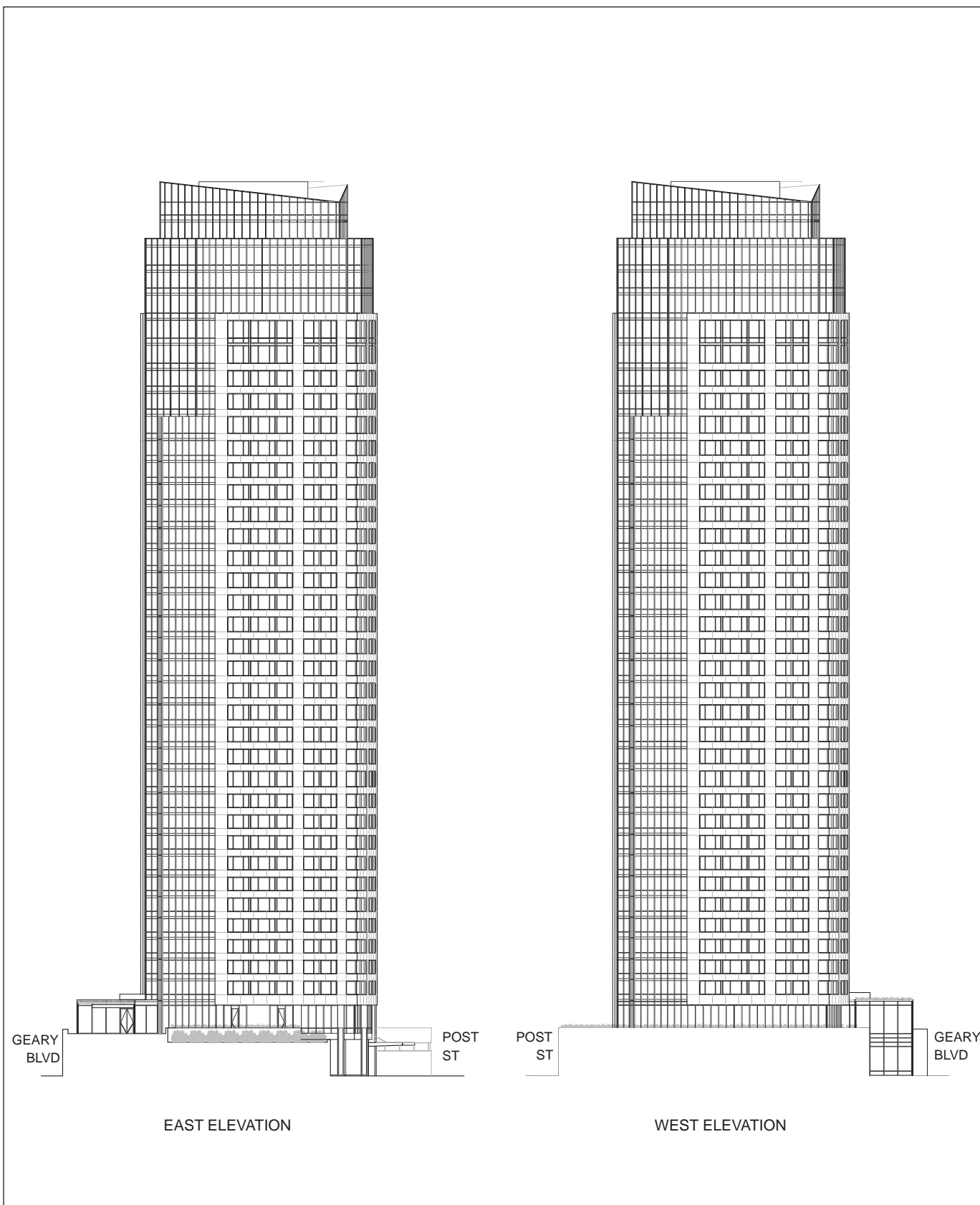


SOURCES: SLCE Architects / MWA Architects

1333 GOUGH STREET/1481 POST STREET

2005.0679E

FIGURE 10: PROPOSED NORTH (POST STREET) ELEVATION

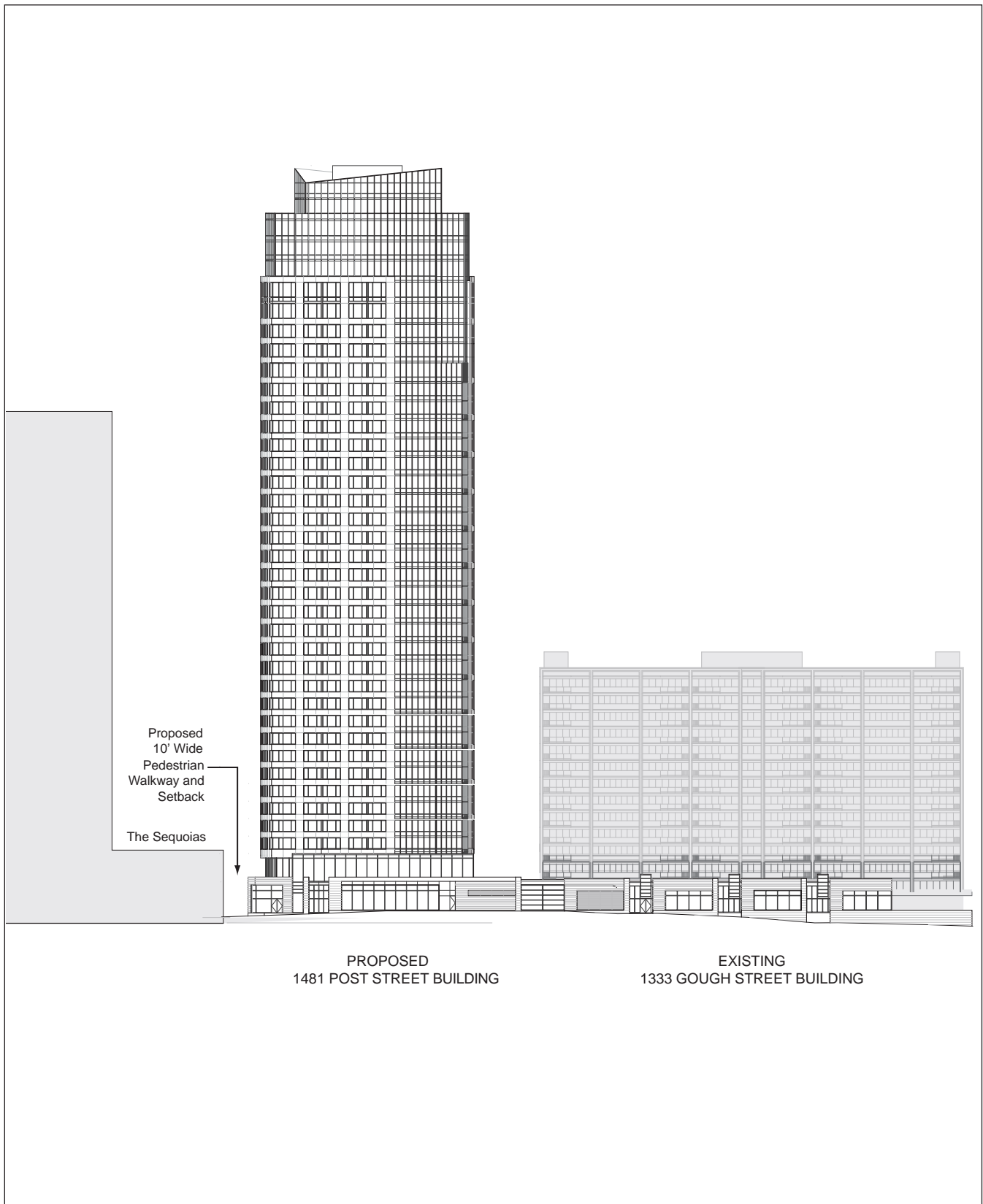


SOURCES: SLCE Architects / MWA Architects

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.

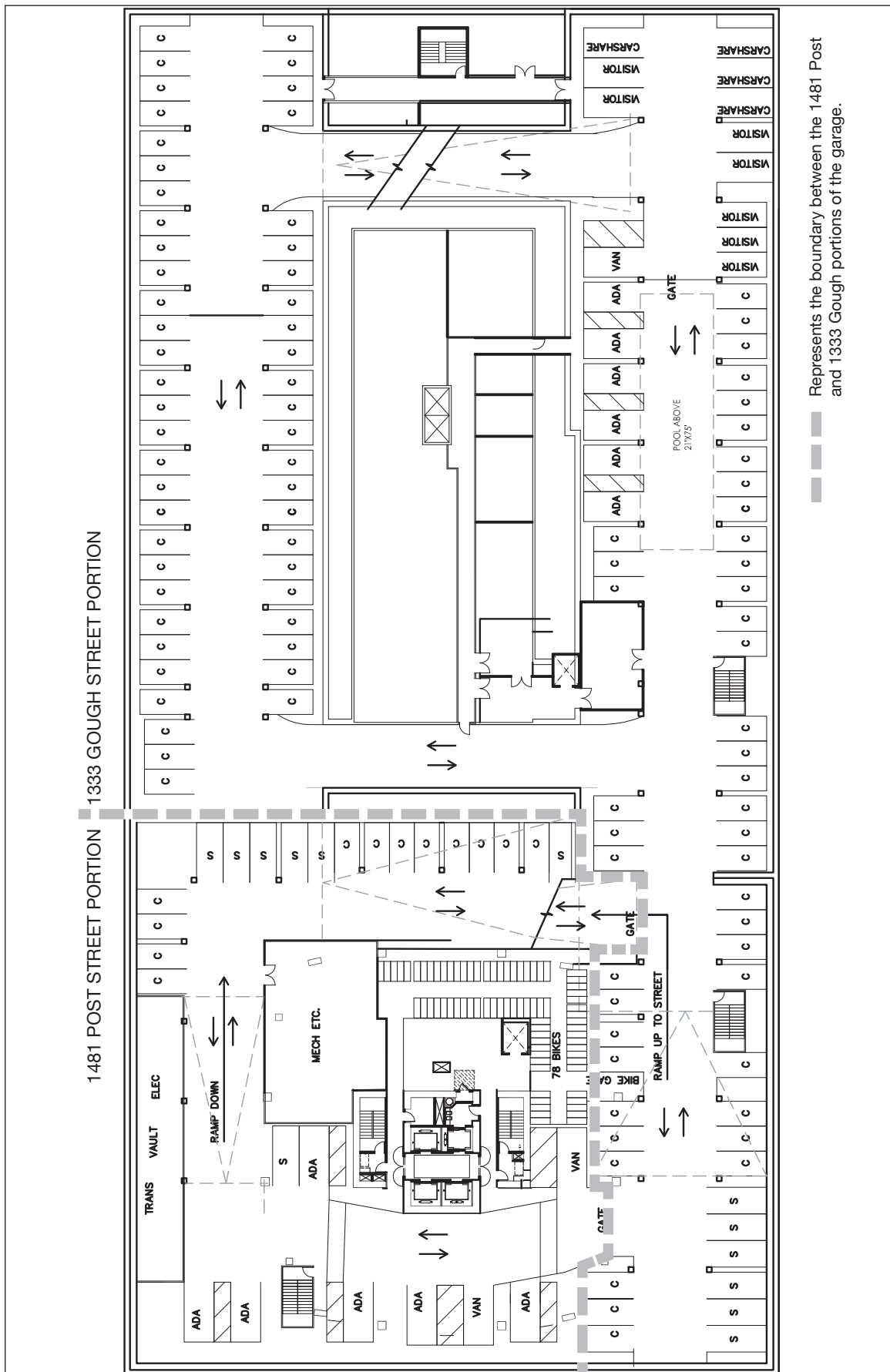
² According to the project sponsor, operation of the fitness center requires a fixed level of employees on payroll that is independent of the number of members (e.g., reception desk, operations manager, and fitness director). The existing fitness center facility is underutilized, particularly since the 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.

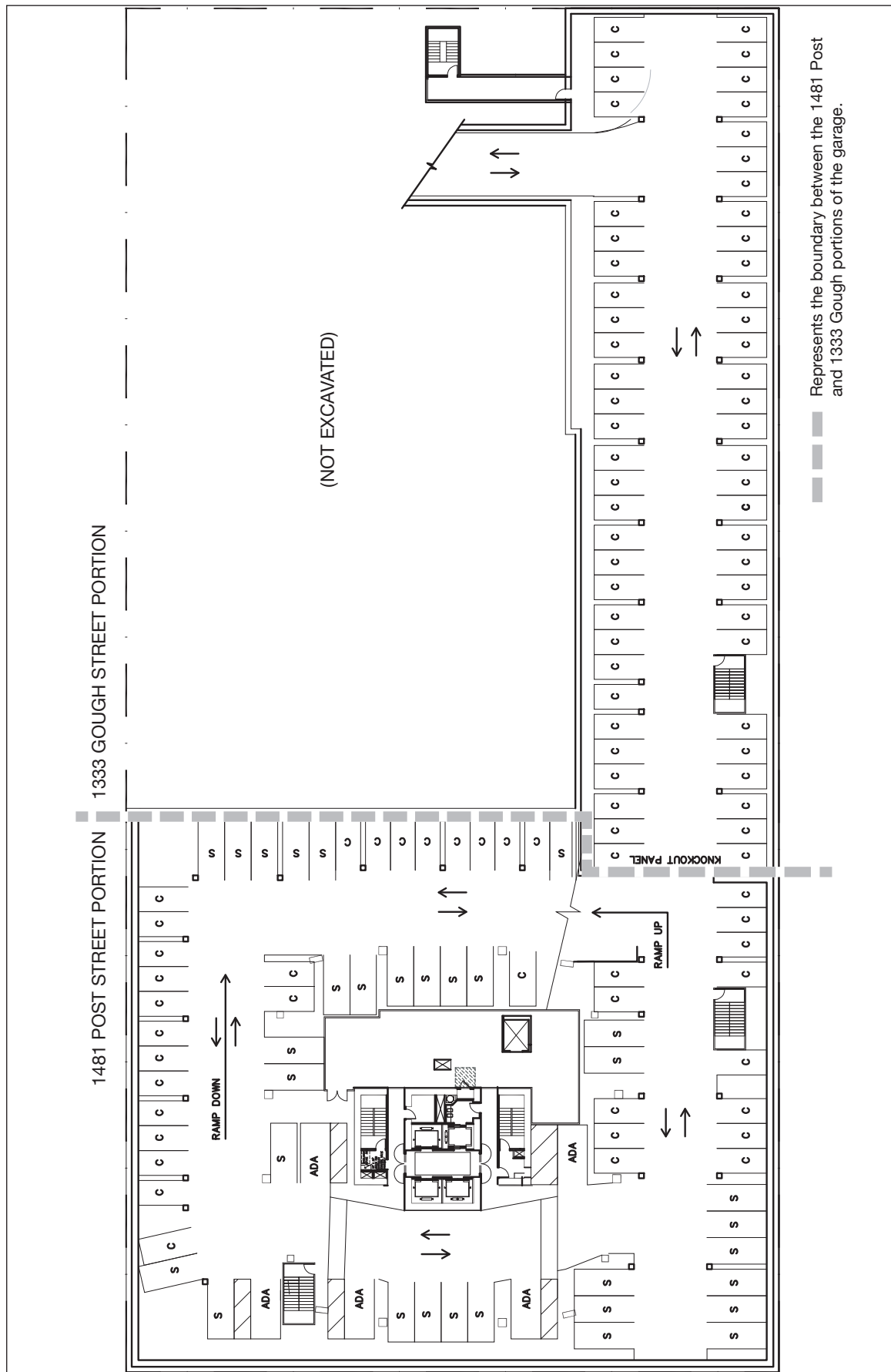


SOURCES: SLCE Architects / MWA Architects

1333 GOUGH STREET/1481 POST STREET

2005.0679E

FIGURE 13: PROPOSED BASEMENT LEVEL 1 PARKING PLAN

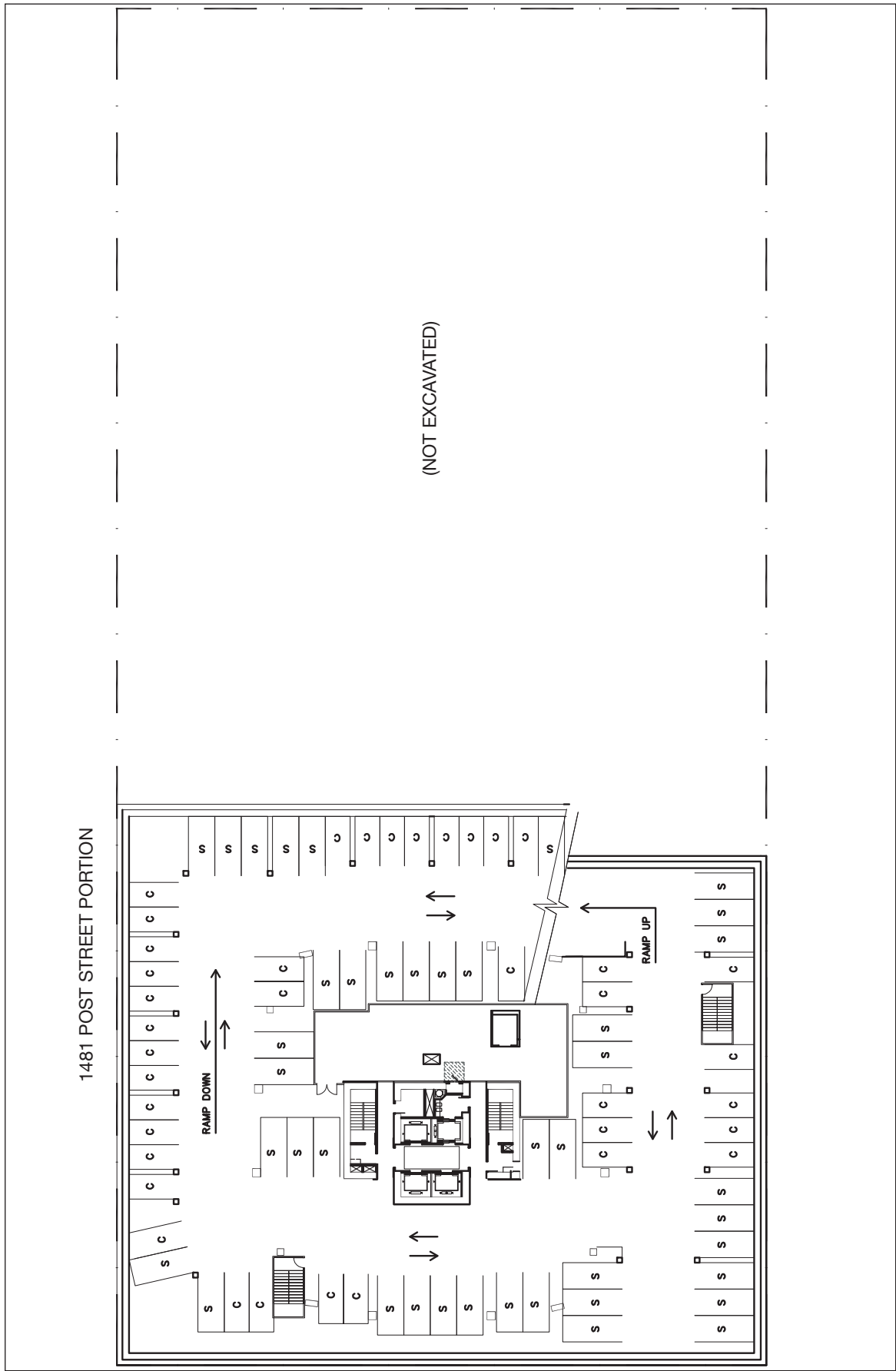


SOURCES: SLCE Architects / MWA Architects

1333 GOUGH STREET/1481 POST STREET

2005.0679E

FIGURE 14: PROPOSED BASEMENT LEVEL 2 PARKING PLAN



SOURCES: SLCE Architects / MWA Architects

1333 GOUGH STREET/1481 POST STREET

2005.0679E

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

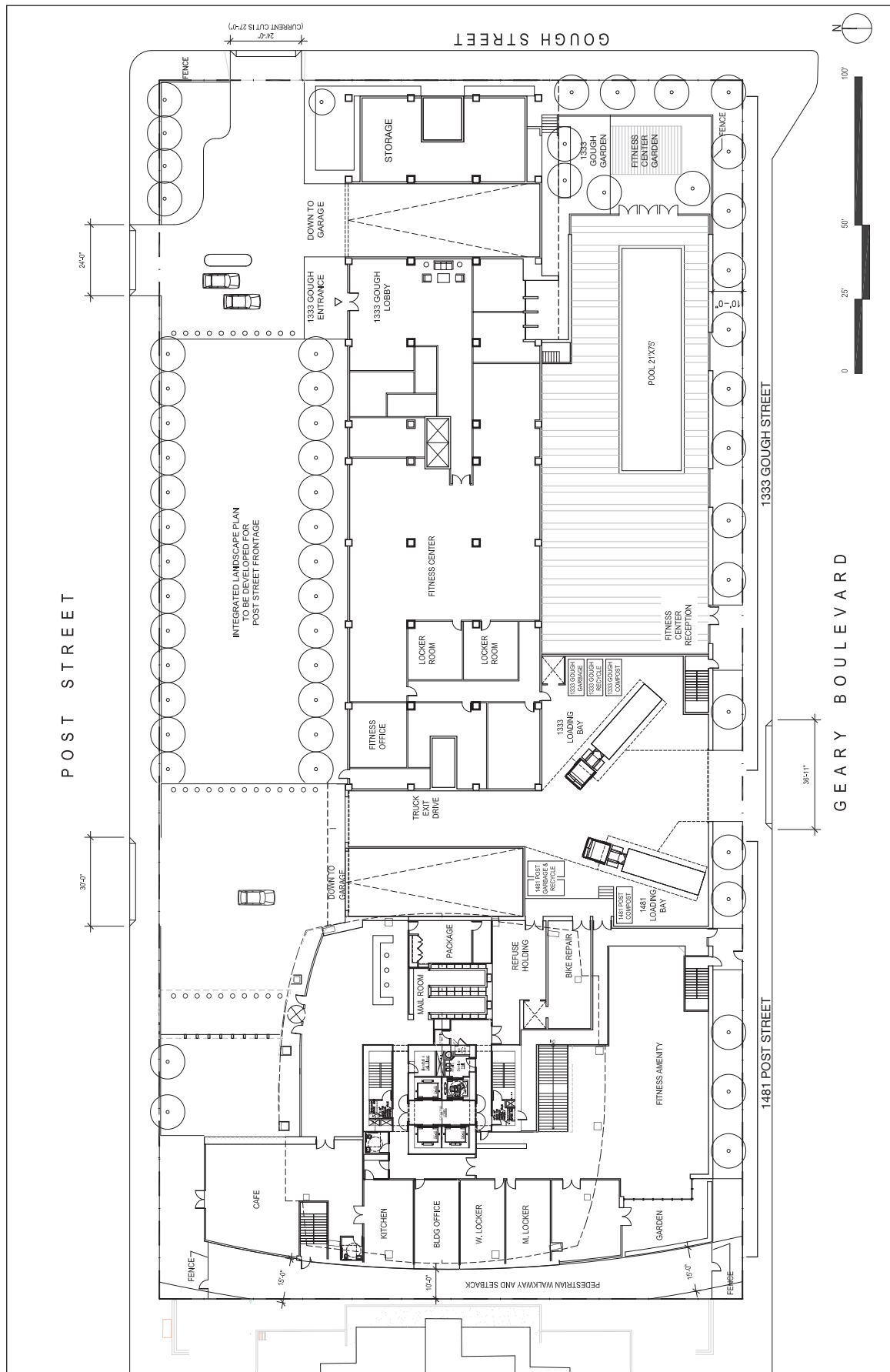
The proposed 1481 Post Street building would have a mat foundation under its core that would extend to perimeter columns. This mat foundation would extend approximately 7 feet below the lowest parking slab elevation. The proposed construction to the south of 1333 Gough Street would also have a mat foundation. 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

1333 GOUGH STREET/1481 POST STREET

2005.0679E

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

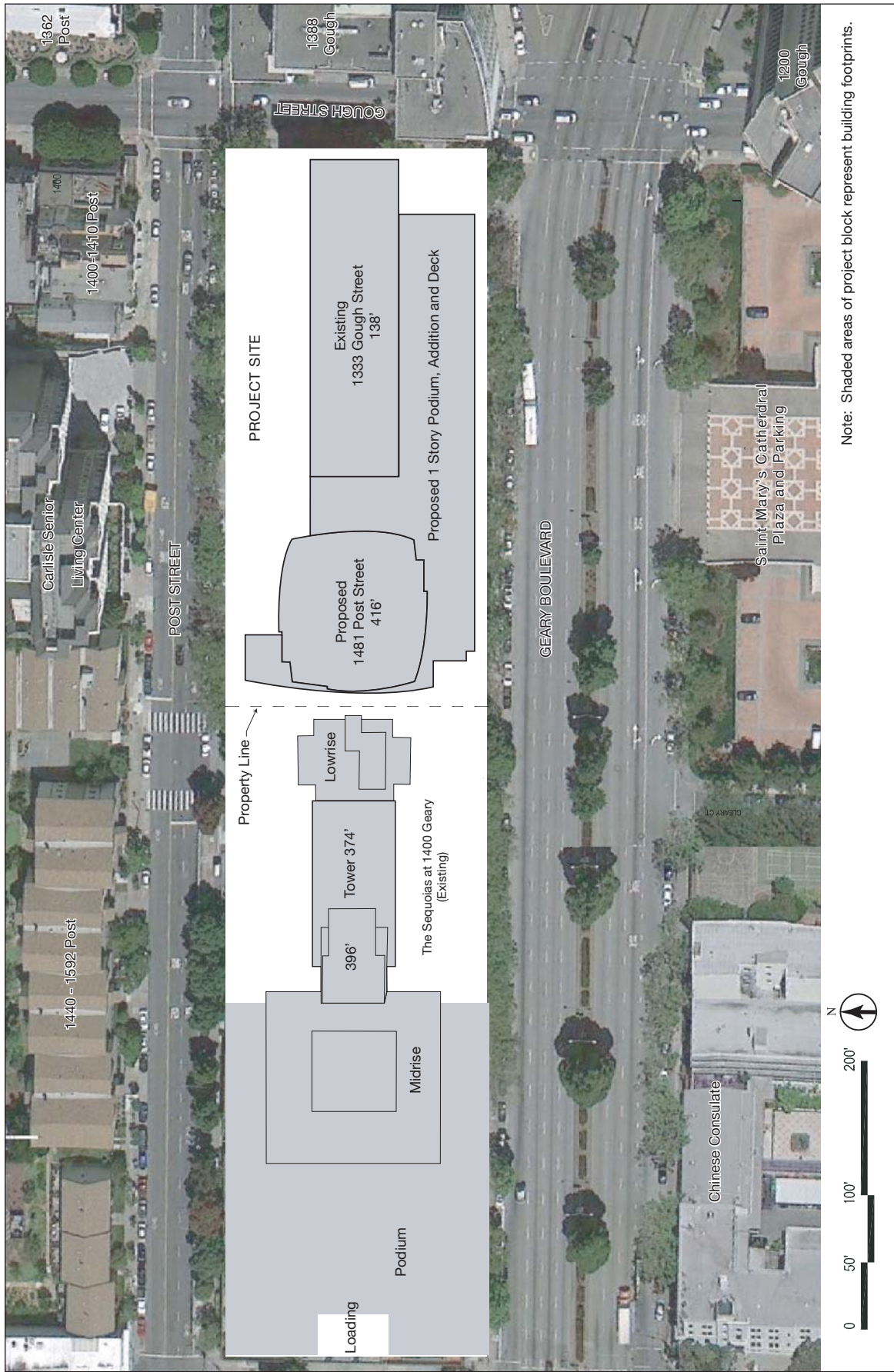
The uses to the north of the project site across Post Street are primarily residential (in a RM-4 District and a 50-X Height and Bulk District). Directly northwest of the project site there is a complex of two- and four-story residential buildings at 1490-1592 Post Street, and a 13-story residential 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

1333 GOUGH STREET/1481 POST STREET

2005.0679E

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"/>

Topics:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Not Applicable
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, EA p1)	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.

<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>
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

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