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Addendum to Environmental Impact Report

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REMARKS

The purpose of this Addendum to the 2004 and 2009 Housing Element Final EIR is to substantiate the Planning Department's determination that no supplemental environmental review is required to update the proposed 2009 Housing Element, as described more fully below ("the 2014 Housing Element" or "proposed project") because the environmental effects of changes to the 2014 Housing Element have been adequately analyzed pursuant to the California Environmental Quality Act ("CEQA") in a Final Environmental Impact Report ("2004 and 2009 Housing Element FEIR" or "FEIR") previously prepared for the 2004 and 2009 Housing Element. This memorandum describes the changes in the 2014 Housing Element from the current 2009 Housing Element, analyzes the proposed project in the context of the previous environmental review (the 2004 and 2009 Housing Element FEIR), and summarizes the potential environmental effects that may occur as a result of implementing the changes found in the proposed 2014 Housing Element.

Background

On March 24, 2011, the San Francisco Planning Commission certified the FEIR for the 2004 and 2009 Housing Element. On June 21, 2011 the San Francisco Board of Supervisors adopted the 2009 Housing Element as the Housing Element of the San Francisco General Plan. The Planning Department recirculated for public review a revised Chapter VII Alternatives of the FEIR (Revised EIR), on December 18, 2013. The Planning Commission certified the 2004 and 2009 Housing Element FEIR, with the Revised Alternatives Analysis, on April 24, 2014. On June 17, 2014, the Board of Supervisors denied an appeal of the certification, and re-adopted the 2009 Housing Element, with minor revisions.

PROPOSED REVISIONS TO THE PROJECT

Purpose of a Housing Element and the Regional Housing Need

The Housing Element is an element of San Francisco's General Plan which sets forth the City's overall housing policies. Since 1969, state Housing Element law (Government Code section 65580 et seq.) which, since 1969, has required local jurisdictions to adequately plan for and address the housing needs of all segments of its population, such that all communities contribute to the attainment of the state housing goals. Housing Element law requires local governments to plan for their existing and projected housing

needs by facilitating the improvement and development of housing, rather than constraining opportunities.

The California Department of Housing and Community Development (HCD) allocates each region’s share of the statewide housing need to regional agencies based on the region’s forecast for population, households, and employment; in the San Francisco Bay Area, the Association of Bay Area Governments (ABAG) distributes the regional allocation to cities and counties within its jurisdiction. The Regional Housing Needs Assessment (RHNA) determination includes that share of the housing need of persons at all income levels. The allocation seeks to ensure that each jurisdiction recognizes their responsibility for the housing that represents the number of additional dwelling units that would be required to accommodate the anticipated growth in households, replace expected demolitions and conversions of housing units to non-housing uses, and achieve a future vacancy rate that allows for the healthy functioning of the housing market. Jurisdictions that do not have capacity to meet their RHNA at all income levels must rezone sites with appropriate development standards to accommodate the unmet capacity. For more information on ABAG’s calculation of the RHNA, see the ABAG website at www.abag.ca.gov.

The RHNA is calculated for an established planning horizon, hereafter referred to as the Planning Period, which for the 2014 Housing Element, is January 2015 through June 2022.¹ The 2014 Housing Element incorporates an updated calculation of San Francisco’s fair share of the regional housing need for the Planning Period. As shown, the regional housing need is 28,869 units, or 3,849 units per year. The RHNA at each income category for the 2014 Housing Element is presented in Table 1, below.

Table 1
2015-2022 Housing Element Regional Housing Needs Assessment

Household Income Category	Percentage of Area Median Income (AMI)	No. of Units	% of Total	Annual Production Goal
Very Low	< 50%	6,234	21.6%	831
Low	51 – 80%	4,639	16.1%	619
Moderate	81 – 120%	5,460	18.9%	728
Above Moderate	> 120%	12,536	43.4%	1,671
Total	--	28,869	100.0%	3,849

As discussed in the 2014 Housing Element,² some 47,020 new housing units could potentially be built on numerous in-fill development opportunity sites under current zoning allowances. In addition, some 22,870 new housing units can be accommodated in vacant or nearly vacant lands currently or previously zoned “Public” such as Mission Bay, Treasure Island and Hunter’s Point Naval Shipyard. Therefore, the Planning Department has determined that the City has sufficient development capacity to meet the 2015-2022 RHNA targets without the need for rezoning.

1 The Planning Period is the time period for a Housing Element. Jurisdictions on 8-year planning cycles must adopt their housing elements no later than 120 days after deadline or will be required to revise their housing elements every four years.

2 2014 Housing Element, Part I: Data Needs and Analysis, Section IV, Meeting Housing Needs, p. 1.65.

Revisions to the 2009 Housing Element

Like the current 2009 Housing Element, the 2014 Housing Element consists of two parts. Part I contains the background data and needs analysis under Government Code section 65583(a), which serves to formulate the goals and policies found in Part II. Part II lists goals, objectives and policies, and describes the programs to be carried out over the next five years to implement these objectives and policies, as required by Government Code section 65583(b) and (c).

The 2014 Housing Element is the continuation of the 2009 Housing Element analyzed in the FEIR, with several updates as outlined herein. The vast majority of updates found in the 2014 Housing Element are contained in Part I, to account for the City's changing population, households, and housing stock characteristics and to more accurately document the inventory of land suitable for residential development. Updates to population, employment, and income trends, housing characteristics, and discussions of housing needs included in Part I of the Housing Element have no direct or indirect physical effects on the environment. The proposed 2014 Housing Element retains the existing Part II of the 2009 Housing Element objectives and policies and adds five new policies and three implementation programs (the implementation programs are contained in Part I). The new policies introduced in the 2014 Housing Element, which are described in more detail below, broadly address programmatic elements related to tenancy protections for current residents and coordination of assistance programs for homeless and/or displaced residents; moreover, four out of the five new policies were policies included in the 2004 Housing Element (the Housing Element preceding the 2009 Housing Element, which was also addressed in the FEIR).³ The three new implementation programs are also described in Table 2. These implementation programs protect the existing rental housing stock, facilitate the implementation of an existing state law, and promote affordable housing.

Like the 2009 Housing Element, the 2014 Housing Element “strives to create a range of new housing to meet spatial needs of all of our residents, particularly those who cannot afford market-rate housing; ensures development is appropriate to the unique needs of individual neighborhoods they are located within; uses community planning processes to ensure that the best qualities of neighborhoods are not only maintained, but strengthened; links new housing to public infrastructure such as transit, open space and community facilities, and privately provided infrastructure such as retail and neighborhood services; and prioritizes housing development that reduces the impacts of greenhouse gas emissions.”⁴

As discussed under the Analysis of Potential Environmental Effects, below, the five added policies and three added implementation programs included in the 2014 Housing Element would not be expected to result in any new physical impact that was not previously identified in the FEIR, or a substantial increase in the severity of any impact that was previously identified in the FEIR. The five added policies and three added implementation programs are listed below in Table 2, along with a summary of the corresponding implications for changes to the physical environment.

3 Throughout this Addendum, it is stated that policies 5.5, 5.6, 6.3, and 6.4 were previously considered in the 2004 and 2009 Housing Element FEIR. That document concluded that these were among the policies in the 2004 Housing Element that would not result in any environmental effects (see, generally FEIR p. IV-23 and Table IV-8).

4 City and County of San Francisco, Planning Department, Draft Housing Element, Preface, October 2014.

Table 2
Proposed 2014 Housing Element Policies and Implementation Program

Additional 2014 Housing Element Policies and Implementation Programs	Physical Implications of Policies or Implementation Programs
<p>Policy 2.6: Ensure housing supply is not converted to de facto commercial use through short-term rentals.</p>	<p>This policy is intended to address an increase in the number of short-term housing rentals in the existing housing stock, which can result in a reduction in the total number of housing units available for permanent residents. The policy would protect the permanent housing stock from de facto conversion to commercial use by converting units to short-term rentals by limiting the ability of property owners to provide short term leases for housing units. This policy would not be expected to result in physical changes to the environment because it would not result in any new construction or conversion and would encourage retention of existing uses.</p> <p>This policy has a corresponding implementation measure (Implementation Program 19), which is listed below in this table.</p>
<p>Policy 5.5: Minimize the hardships of displacement by providing essential relocation services.</p>	<p>This policy, which was also included in the 2004 Housing Element as Policy 9.1, would encourage the provision of financial and other types of resources (such as counseling, locating replacement housing, and moving expenses) to assist individuals in locating replacement housing. This policy would not be expected to result in physical changes to the environment.</p>
<p>Policy 5.6: Offer displaced households the right of first refusal to occupy replacement housing units that are comparable in size, location, cost, and rent control protection.</p>	<p>This policy, which was also included in the 2004 Housing Element as Policy 9.2, would provide individuals displaced by fire and other events with opportunities to be restored to their previous residential position to the maximum extent feasible. This policy would not be expected to result in physical changes to the environment because it addresses replacement of existing units and their occupancy.</p>
<p>Policy 6.3: Aggressively pursue other strategies to prevent homelessness and the risk of homelessness by addressing its contributory factors.</p>	<p>This policy, which was also included in the 2004 Housing Element as Policy 10.2, is unrelated to the development or improvement of new or existing housing. Rather, it aims to address the root causes of homelessness by focusing on stable sources of income and health and social support services for short or long periods of time to assist people with special needs to live with the greatest degree of independence possible. This policy would not be expected to result in physical changes to the environment because there are no demonstrable physical changes</p>

	associated with these programs.
Policy 6.4: Improve coordination among emergency assistance efforts, existing shelter programs, and health care outreach services.	This policy, which was also included in the 2004 Housing Element as Policy 10.3, aims to link homeless populations to more (existing) comprehensive services. This would be achieved through outreach services and creation of multi-service centers that provide health care and other services to homeless people. This policy would not be expected to result in physical changes to the environment because there are no demonstrable physical changes associated with these programs.
Implementation Program 19: The City should develop an effective enforcement program for short term rentals. The enforcement program should serve the existing law's goal in protecting the housing supply from conversion to commercial hotels. The Planning Department should conduct a study on the impact of short term rentals on the broader housing supply in the city, focusing especially on neighborhoods with greater levels of short term rentals. Based on this study and evaluation of the enforcement program, the City shall revisit the law as understanding of these impacts expand.	This implementation program would support new Policy 2.6 and is intended to address an increase in the number of short-term housing rentals in the existing housing stock, which can result in a reduction in the total number of housing units available for permanent residents. This implementation measure would develop an enforcement program and initiate a study on the impacts of short term rentals, which are both administrative actions. This implementation program would not be expected to result in physical changes to the environment because there are no demonstrable physical changes associated with it.
Implementation Program 38b: Planning will develop a density bonus program with the goal of increasing the production of affordable housing. The program will be structured to incentivize market rate projects to provide significantly greater levels of affordable housing than required by the existing City Programs.	This implementation program would be consistent with an existing State law requirement (Government Code Section 65915) and would provide density bonuses and regulatory incentives and concessions for residential projects that include one or more affordable units. This program, when developed, will undergo a public review, including environmental review under CEQA (likely in Spring or Summer 2015). This program is discussed in further detail below, under Other Housing-Related Initiatives.
Implementation Program 64: In accordance with the Proposition K Affordable Housing Goals ballot initiative measure passed in November 2014, the City shall strive to achieve thirty-three percent of new residential units affordable to low- and moderate-income households in new Area Plans and Special Use Districts with significantly increased development	This implementation program would help the City meet RNHA goals. The 2014 Housing Element already assumes that a certain percentage of new development (57 percent) would meet RHNA affordability targets. Affordability of new development was also assumed as part of the 2009 Housing Element FEIR; thus, this would not change the conclusions reached with respect to any of the environmental impacts, as discussed below, under Analysis of Potential Environmental Effects.

<p>potential or those amended to significantly increase development potential. MOH and Planning shall consider, within the context of a community planning process, zoning categories which require a higher proportion of affordable housing where increased density or other benefits are granted. Options include Affordable Housing Only Zones (SLI); Affordable Housing Priority Zones (UMU) or Special Use Districts on opportunity sites.</p>	
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Two policies in the 2014 Housing Element have been revised to reflect administrative changes. The first revised policy is Policy 1.5, which revises the term “community plan” to “community planning process” to account for the fact that some community planning processes occur outside of a formal community plan.⁵ The second revised policy is Policy 6.1, which adds “service-enriched solutions” as one of the strategies toward eliminating homelessness.⁶ Examples of service-enriched solutions include programs such as health clinics and job placement assistance.⁷

In addition, Part II of the 2014 Housing Element contains a limited number of revisions to existing policy descriptions. Generally, these revisions:

1. Update statistical data and historic trends;
2. Update agency names (for example, references to San Francisco Redevelopment Agency have been replaced with Office of Community Investment and Infrastructure or OCII); and
3. Reflect the fact that some Planning Department efforts related to housing have been completed (i.e., Treasure Island, and Candlestick Point and Hunter’s Point Shipyard).

There is no evidence that these minor revisions to policies or policy descriptions would have any physical impacts on the environment.

The 2014 Housing Element also contains 29 updated implementation programs, **which are listed in the Appendix** of this document and cover a wide range of programs and procedures. Most of the implementation programs are administrative in nature and are existing programs currently being implemented by one or more local, regional, and/or state agencies. Some implementation programs, such as Implementation Programs 91 and 95 have not been sufficiently developed for purposes of environmental review and will be subject to a separate environmental review process (it would be speculative to analyze them prior to their completion). Others were previously adopted in separate

5 The revised Policy 1.5 states “Consider secondary units in community planning processes where there is neighborhood support and when other neighborhood goals can be achieved, especially if that housing is made permanently affordable to lower-income households.”

6 The revised Policy 6.1 states “Prioritize permanent housing and service-enriched solutions while pursuing both short- and long-term strategies to eliminate homelessness.”

7 Given the minor nature of the revisions to Policy 1.5 and Policy 6.1, these are considered revisions to existing policies for the purposes of environmental review rather than added policies.

legislative or regulatory proceedings, and were determined to not be a project pursuant to CEQA. Given the administrative nature of these implementation programs and the fact that most of them implement existing objectives and policies in the 2009 Housing Element, there is no evidence that they would result in any new physical impacts or a substantial increase in the severity of any previously identified impact. Table A-1 in the Appendix to this document lists each updated implementation program and the corresponding physical implications.

Lastly, the 2014 Housing Element deletes two implementation programs that have either been superseded by more recent efforts or have expired. One is 2009 Housing Element Implementation Program 36, which called for the Mayor and the Board of Supervisors to work toward the goal of the Next Generation SF, including planning for and/or acquiring sites for 3,000 family units by 2011. In the past several years, San Francisco has done a significant amount of work around identifying funds for affordable housing and developing a strategy for expenditures. This implementation program refers to a prior planning process that is now superseded by work as part of the Housing Trust Fund, the Mayor's Working Group and other MOHCD work. The deletion of this implementation measure is not expected to result in physical changes on the environment. The other is 2009 Housing Element Implementation Program 61, which called for the City, under the oversight of the Capital Planning Committee, to formalize an interagency grant committee to create a coordinated grants strategy for pursuing stimulus funds for housing and supporting infrastructure. Since the 2009 Housing Element, the City has become more strategic in prioritizing infrastructure for the various competitive funding sources. However, this coordination did not result in a formal inter-agency committee. This implementation program is no longer relevant to ongoing work around interagency coordination for infrastructure funding. The deletion of this implementation measure is not expected to result in physical changes on the environment.

Overall, it is not anticipated that any of the policy or implementation program revisions or deletions discussed above or in the Appendix would result in a physical effect on the environment, or an impact that is more severe than identified in the 2009 Housing Element FEIR. This is because such revisions update statistical information and other data, and no evidence exists that they would have substantial direct or indirect impacts on the environment.

In terms of cumulative impacts, the FEIR did not identify any significant cumulative impacts, with the exception of an impact on transit. The proposed revisions to the Housing Element would not be expected to increase the contribution of the Housing Element to cumulative growth or physical change, as described in the FEIR and further defined in the section below entitled "Changes in the Physical and Regulatory Environment." Therefore, as demonstrated in the Analysis of Potential Environmental Effects, there would be no new or substantial increase in the severity of the project's contribution to cumulative impacts. This conclusion is applicable to all environmental analysis topic areas.

Project Approvals

Following the publication and distribution of this Addendum, the Planning Commission would consider whether to adopt the proposed 2014 Housing Element. Under Planning Code Section 340, General Plan amendments must be approved by the Planning Commission and the Board of Supervisors. In addition, in order to receive certain state funding or be eligible for certain state programs, the Housing Element must be certified as compliant with state housing element law by the HCD. State certification of the Housing Element provides the City with a number of benefits, including a legally adequate General Plan,

greater protection from potential legal challenges to the housing element, and priority access to State housing funds.

SETTING

Project Location

The 2014 Housing Element would apply to the entire City and County of San Francisco (City). San Francisco is a consolidated city and county located on the tip of the San Francisco Peninsula with the Golden Gate Strait to the north, San Francisco Bay to the east, San Mateo County to the south, and the Pacific Ocean to the west. The City is one of nine counties adjacent to San Francisco and San Pablo Bays. Daly City and the City of Brisbane abut San Francisco to the south. San Francisco is approximately 49 square miles in size. The City is made up of numerous planning districts and several plan areas (areas which have undergone, or are in the process of, a comprehensive community planning effort). Although San Francisco is densely developed, there remain developable vacant parcels, as well as underused parcels, which are currently zoned to allow housing in various locations throughout the City.

Changes in the Physical and Regulatory Environment

Since the adoption of the 2009 Housing Element, a number of projects that were assumed in the FEIR as part of the City's development pipeline have been approved, or implemented.⁸ Development anticipated at Parkmerced has also been initiated with the submittal of Phase I Application by the project applicant. The HOPE SF projects, at both Sunnysdale and Potrero locations, are also undergoing the environmental review processes, and are anticipated to commence construction in the next five years. Construction has commenced at Candlestick Point-Hunters Point Shipyard, which will include a shopping center, homes, restaurants, and parks. Planning efforts for Executive Park, Glen Park, Treasure Island and the Transit Center District Plan were also completed. Although these planning efforts were completed, housing development anticipated under the plans has not yet occurred and the units expected from these projects would continue to be included in the City's pipeline and/or projections.

Although there are a number of projects currently under construction throughout the City, this ongoing residential development was anticipated in the 2009 Housing Element EIR (for example as development projects included in the Eastern Neighborhoods Area Plans and the Market Octavia Area Plan) and were included as part of the FEIR's discussion of the City's existing capacity. This development was assumed throughout the environmental analysis. Therefore, the level of residential development current underway does not constitute a change in circumstances as it pertains to the environmental review of the 2014 Housing Element.

In terms of recent legislation, in November 2014, the residents of San Francisco passed Propositions A and B. Proposition A authorized the city to borrow \$500 million through issuing general obligation bonds in order to meet some of the transportation infrastructure needs of the city. A city Transportation Task Force identified \$10 billion in spending on "crucial infrastructure projects" earlier in 2014 and Proposition A funds were designed to address some of the needs identified by the task force. The bonds were earmarked for a list of projects, which include constructing transit-only lanes and separated bikeways, installing new boarding islands and escalators at Muni/BART stops, installing sidewalk curb bulb-outs,

⁸ A list of projects that were analyzed through the community plan process is provided on the Planning Department's website, <http://www.sf-planning.org/index.aspx?page=2780>.

raised crosswalks, median islands, and bicycle parking and upgrading Muni maintenance facilities, among various others improvements. Proposition A also allowed the City to impose property taxes to repay the bonds. Proposition B, which was also passed during the same election in November 2014, amends the city Charter to increase the amount the City provides to the Municipal Transportation Agency based on increases in the City's population, with such funds to be used to improve Muni service and street safety. While the passage of Propositions A and B is being discussed here for informational purposes, it is not expected that they would result in a demonstrable increase in any of the environmental impacts discussed in the FEIR. Rather, as discussed in the Transportation and Circulation section, below, these ballot initiatives may serve to limit the significant transit impact identified in the FEIR.

Changes to Housing Projections

This Addendum recognizes that the population and housing projections that were assumed in the FEIR have been updated. As reported in the 2014 Housing Element,⁹ the 2012 American Community Survey estimated San Francisco's population to be about 807,755. ABAG projects continued population growth to 981,800 by 2030 or an overall increase of about 174,045 people who will need to be housed over the next 18 years. In comparison, the population projections included in the 2009 Housing Element FEIR for 2030 are 934,800. Household growth, an approximation of the demand for housing, currently indicates a need for some 72,530 new units in the 18 years to 2030 just to accommodate projected population and household growth. As with the 2004 and 2009 Housing Elements, the new and revised policies and implementation measures included in the 2014 Housing Element would not change these population and housing projections. Rather, the policies would influence the location and type of residential development that would be constructed to meet demand.

Other Housing-Related Initiatives

Mayor's Executive Directive. In December of 2013, Mayor Edwin M. Lee introduced a Mayoral Executive Directive ordering all City departments that have the legal authority over the permitting or mapping of new or existing housing to prioritize in their administrative work plans the construction and development of new housing including permanently affordable housing. Mayor Lee ordered City departments to prioritize 100 percent permanently affordable developments, and thereafter prioritize residential developments based on the proportion of permanently affordable units produced onsite or offsite through the City's inclusionary housing program as defined by Section 415 of the San Francisco Planning Code. Based on this directive, it is possible that a greater proportion of RHNA goals for very low-, low-, and moderate-income housing would be constructed during the 2014 Housing Element Planning Period as compared to the 2009 Housing Element Planning Period (2007-2014).

This directive would not increase the severity of impacts identified in the FEIR, because the City has capacity to meet (and exceed) the RHNA under existing zoning. The Housing Element FEIR analysis was based on housing projections provided by ABAG; the Mayor's Executive Directive generally encourages projects that include affordable housing, prioritizes housing over other types of development, and is meant to increase the affordability of the units that are built to meet demand. Housing developed under the Executive Directive would be within the overall housing development totals analyzed in the FEIR.

Density Bonus Program. As noted in Implementation Program 38b, the City is currently developing a local density bonus program, as required by Government Code section 65915 (state Density Bonus Law),

⁹ 2014 Housing Element, Part I, p. I.4.

which would provide density bonuses and regulatory incentives and concessions for residential projects that include one or more affordable units. Many cities in California have chosen to develop local programs which articulate local procedures and directives related to implementing the state Density Bonus law, although compliance with the state program is required by law even without a local program. In San Francisco, development projects that choose to fulfill their affordable housing requirements per section 415 of the Planning Code through the provision of onsite below market rate (BMR) units may be eligible to pursue a state-mandated housing density bonus. The exact terms of the San Francisco program are yet unknown and therefore, analysis of the environmental effects would be speculative. The program would define the parameters of concessions and incentives, consistent with state requirements. When drafted, the City's implementation program, which is independent from, and not dependent upon, the adoption of the Housing Element, will undergo a public review, including environmental review under CEQA, likely in Spring or Summer 2015. The 2014 Housing Element would not contribute to any cumulative impacts that may occur in combination with implementation of a proposed density bonus program, because the updates in Housing Element policies would not contribute to the severity of potential localized effects that may result from individual projects utilizing the Density Bonus Program.

REMARKS

The 2004 and 2009 Housing Element Final EIR identified less-than significant environmental impacts in the following environmental topic areas:

- Land Use and Land Use Planning;
- Visual Quality and Urban Design;
- Population and Housing;
- Cultural and Paleontological Resources;
- Air Quality;
- Greenhouse Gas Emissions;
- Wind and Shadow;
- Recreation;
- Utilities and Service Systems;
- Public Services;
- Biological Resources;
- Geology and Soils;
- Hydrology and Soils;
- Hazards and Hazardous Materials;
- Mineral and Energy Resources; and
- Agricultural and Forest Resources.

The Final EIR found that effects related to encouraging new residential development along streets with noise levels above 75 dBA L_{dn} can be avoided or reduced to a less-than-significant level with mitigation, and a mitigation measure addressing the issue was incorporated into the adopted Housing Element as an implementation measure.

The FEIR found also that adoption of the 2004 or 2009 Housing Element would potentially result in significant environmental effects on the transit network that could not be mitigated to a less-than-significant level with implementation of feasible mitigation measures.

As discussed throughout this Addendum, and noted in the FEIR, the proposed project does not propose new housing development projects and would not directly or indirectly result in the construction of residential units. This is because, similar to the 2009 Housing Element, the 2014 Housing Element does not propose or include any changes to zoning controls, changes in height, bulk or density requirements, or other revisions that could directly or indirectly result in new development not already authorized under existing regulations. Rather, the 2014 Housing Element is a policy-level and programmatic document that analyzes whether there is adequate land available to meet future housing needs at all income levels, provides policies to ensure that such development is not unreasonably constrained, and includes policies and objectives to guide the future development of housing. Future projects or proposals

that may result in changes to development controls would require additional policy review, including environmental review.

As noted in the FEIR, the 2004 and 2009 Housing Elements could indirectly influence the general locations of future development due to policies which promote development in certain areas of the City (e.g., along transit corridors, etc.), or could indirectly influence the number of units in a given development due to policies related to density (i.e. increased density in areas served by transit). However, on a citywide level, the policies in the Housing Element would not affect the total number of new housing units that would be developed in the City. Rather, projected housing need is based on demand created by population growth and includes a) natural increase (births minus deaths); b) migration, and; c) household formation rates. The state Department of Finance and ABAG worked together to determine appropriate headship rates¹⁰ to use with projected population growth forecasts to determine household growth and consequent demand for housing. Because it is not possible to predict the impacts of specific projects, and such projects would be able to proceed regardless of the 2014 Housing Element, such impacts would be addressed on a project-specific basis as part of future environmental review.

ANALYSIS OF POTENTIAL ENVIRONMENTAL EFFECTS

San Francisco Administrative Code Section 31.19(c)(1) states that a modified project must be reevaluated and that “[i]f, on the basis of such reevaluation, the Environmental Review Officer (ERO) determines, based on the requirements of CEQA, that no additional environmental review is necessary, this determination and the reasons therefore shall be noted in writing in the case record, and no further evaluation shall be required by this Chapter.”

CEQA Guidelines Section 15164 provides for the use of an addendum to document the basis of a lead agency’s decision not to require a Subsequent or Supplemental EIR for a change to a project that has been analyzed in a certified EIR. The lead agency’s decision to use an addendum must be supported by substantial evidence that the conditions that would trigger the preparation of a Subsequent EIR, as provided in CEQA Guidelines Section 15162, are not present.

Since certification of the 2004 and 2009 Housing Element Final EIR, a number of revisions have been made to the Planning Code, General Plan and other city policies and regulations (including the Inclusionary Housing Program, Standards for Bird-Safe Buildings, and others).¹¹ Those changes are independent from this update to the Housing Element, and have either been determined to not be a project as defined under CEQA or have undergone separate environmental reviews. None of them would result in changes that substantially deviate from the overarching goals and objectives that were articulated in the 2009 Housing Element (such as directing growth to certain areas of the City, promoting preservation of residential buildings, etc.) in a way that could render the conclusions reached in the FEIR as invalid or inaccurate. Since the 2014 Housing Element would continue most of the 2009 Housing Element policies (with minor changes), these revisions to the regulatory environment would also not be expected to affect the severity of impacts discussed in the FEIR. Further, no new information has emerged that would materially change the analyses or conclusions set forth in the FEIR.

¹⁰ Headship rates are the number of people who are counted as heads of households.

¹¹ Most changes to the Planning Code and other documents can be found on the Planning Department’s website: <http://www.sf-planning.org/index.aspx?page=2977>.

The proposed project, as demonstrated below, would not result in any new significant environmental impacts, substantial increases in the significance of previously identified effects, or necessitate implementation of additional or considerably different mitigation measures than those identified in the FEIR. The effects associated with the proposed project would be substantially the same as those reported for the 2009 Housing Element FEIR, and thus no supplemental or subsequent EIR is required. The following discussion provides the basis for this conclusion.

Land Use and Land Use Planning

2009 Housing Element

The FEIR found that implementation of the 2009 Housing Element *would not conflict with applicable local, state, and federal land use plans, policy, or regulations*, including the San Francisco General Plan, the San Francisco Countywide Transportation Plan, and other applicable plans. The FEIR also found that new development, including infrastructure to support community planning efforts, *would not divide an established community*. As reported in the FEIR, the 2009 Housing Element encourages future housing development in infill areas or on individual parcels, and future housing development would be expected to occur in established residential neighborhoods. The FEIR also noted that the 2009 Housing Element would not change the types of land uses already permitted by the City's Planning Code; therefore, it would not physically divide an established community. Furthermore, none of the policies in the 2009 Housing Element were found to encourage the division of a community. Therefore, impacts related to conflicts with applicable policies and physical division of an established community were found to be less than significant.

The FEIR also found that the 2009 Housing Element *would not have a substantial environmental impact upon the existing character of the vicinity*. As reported in the FEIR, the City includes a mix of land uses, including residential, retail, institutional and cultural, commercial, industrial, and open space areas, and these various types and mixtures of land uses contribute to the existing land use character throughout the City. The policies included in the 2009 Housing Element would direct growth to certain areas of the City, which could result in a shift in land use character, and would promote increased density-related development standards, but only after a community planning process (such as an Area Plan) has been completed. The FEIR also found that incremental increases in residential density in areas that currently permit residential uses would not substantially change the existing land use character. In addition, the FEIR also found that the 2009 Housing Element would not result in new housing that would be out of scale with development in an existing neighborhood or development that is so different that it would change the existing character of an area. Lastly, as discussed in the FEIR, any new development would require design review, and would be subject to other state and local regulations such as San Francisco Administrative Code Chapter 35,¹² which would reduce potential land use conflicts. Thus, the FEIR found

12 Chapter 35 of the San Francisco Administrative Code "Residential and Industrial Compatibility and Protection" is designed to protect existing and future industrial businesses from potentially incompatible adjacent and nearby development. The City encourages the use of best available control technologies and best management practices whenever possible to further reduce the potential for incompatibility with other uses, including residential. Another goal of this ordinance is to protect the future residents of industrial and mixed-use neighborhoods by providing a notification process so that residents are made aware of some of the possible consequences of moving to an industrial or mixed-use neighborhood and by encouraging and, if possible, requiring, features in any new residential construction designed to promote the compatibility of residential and adjacent or nearby industrial uses.

project-specific and cumulative impacts on land use and land use planning associated with the 2009 Housing Element updates to be less than significant.

Proposed Project

Following the original certification of the FEIR, several additional Area Plans were completed. As anticipated in the FEIR, these plans include Treasure Island, and Candlestick Park and Hunter's Point Shipyard. In addition, the Central SoMa Plan and the 4th and King Railyard project are currently under way (the 4th and King Railyard project is in a preliminary planning phase with no plans yet developed). These projects are independent from the changes in the Housing Element, are not dependent on the updates to the Housing Element, and are currently undergoing separate environmental review. If completed, the Central SoMa Plan and the 4th and King Railyard site plan could result in a community-based housing strategies for those neighborhoods, and/or related zoning changes and neighborhood-specific design guidelines. These ongoing efforts would not change the conclusions reached in the FEIR with respect to land use impacts because the FEIR already assumed that a portion of the projected housing demand would be met within those sites and considered land use impacts associated with these plans.

The 2014 Housing Element would continue all of the 2009 Housing Element objectives and policies, and most of the implementation measures which direct growth to certain areas of the City, promote increased density standards, promote preservation of residential buildings, promote energy-efficient housing development, and promote locating housing in proximity to job cores, neighborhood services and along transit routes. The 2014 Housing Element does not propose any specific projects, or zoning changes, and no zoning changes are required to under state law, because the City currently has available capacity to meet the RHNA. Moreover, the 2014 Housing Element would not directly result in increases to population, as residential growth during the Planning Period would occur regardless of Housing Element policies. The 2014 Housing Element would instead continue to provide direction for how new residential development in the City should occur, with an emphasis on affordability. The FEIR did not attribute any difference in environmental impacts to affordable housing as compared to market-rate housing. Therefore, as concluded in the FEIR for the 2009 Housing Element, the implementation of those same policies through the 2014 Housing Element would likewise result in less-than-significant impacts with respect to land use and land use planning.

As noted throughout this Addendum, the five policies added to the 2014 Housing Element would not be expected to result in physical impacts that would adversely affect the environment. Added policies 5.5, 5.6, 6.3, and 6.4 would result in administrative changes to the City's programs that serve low-income, homeless, and displaced populations but would not be expected to result in any physical changes to the environment. Moreover, they were part of the 2004 Housing Element and were previously considered in the FEIR. Added Policy 2.6 would ensure that housing supply is not converted to de factor commercial use through short-term rentals. This policy would also not result in any environmental impacts, since it encourages the continuation of the status quo with respect to maintaining existing housing stock and use. To the degree that these additional policies could lead to more affordable housing projects than would otherwise be constructed, there is no evidence that such projects would result in more severe impacts with respect to land use and land use planning than were identified in the FEIR. This is because those affordable housing projects would have similar operational characteristics as market rate housing and would be subject to the same regulations related to land use and land use planning.

The three new implementation programs also would also not be expected to result in physical impacts that would adversely affect the environment. Implementation Program 19 supports Policy 2.6, which

would reinforce the status quo related to existing housing. Implementation Program 38b implements a density bonus program that already exists under State law (Government Code Section 65915). Finally, Implementation Program 64 promotes affordable housing; as noted above affordable housing was already assumed as part of the FEIR and would not increase environmental impacts due to the similar operational characteristics as market-rate housing.

Based on the foregoing, the 2014 Housing Element would not change or alter any of the FEIR's findings with respect to impacts to land use and land use planning and would not require any new mitigation measures. Additionally, there are no changed circumstances or new information that would change the FEIR's impact findings with respect to land use and land use planning.

Aesthetics

2009 Housing Element

The FEIR found that implementation of the 2009 Housing Element *would not have a substantial adverse effect on a scenic vista*. The FEIR noted that the 2009 Housing Element, through various policies related to density requirements, could result in taller buildings and larger building masses that could affect scenic views and could also result in infill development in areas that could block views or change views from nearby residences and businesses. However, the FEIR noted that the 2009 Housing Element also contains other policies that would serve to counteract such impacts – these include policies that encourage retaining existing housing, which could reduce demand for construction of new housing, potentially avoiding adverse impacts on scenic vistas, and policies that promote retaining existing neighborhood scale. Therefore, the FEIR concluded that the 2009 Housing Element would not have a significant impact on scenic vistas.

The FEIR also found that the 2009 Housing Element also *would not result in significant impacts related to damaging a scenic resource* such as topographic features, landscaping, or a built landmark that contributes to a scenic public setting. As discussed in the FEIR, new development would be required to comply with existing regulations, including the Residential Design Guidelines, Section 311 of the San Francisco Planning Code and the Urban Design Element of the San Francisco General Plan. Generally, these regulations guide new development such that it minimizes impacts on the City's environment, by requiring that new development conform to existing development standards, therefore minimizing any scenic resources. Therefore, adherence to these regulations would avoid significant impacts related to damaging scenic resources. The FEIR also found that the 2009 Housing Element *would have a less-than-significant impact with respect to degradation of existing visual character*. As stated in the FEIR, the 2009 Housing Element contains policies that would direct growth to certain areas of the City; as stated above under Land Use and Land Use Planning, these policies would have a less-than-significant impact on land use character because the 2009 Housing Element would not directly result in changes to the physical land use controls or to allowable uses, or increase allowable building height and bulk. Based on this, the FEIR determined that the 2009 Housing Element and new development would be consistent with policies respecting existing neighborhood character, and would be required to comply with the Residential Design Guidelines, Section 311 of the Planning Code and the Urban Design Element. Thus, the FEIR determined that the 2009 Housing Element would not result in substantial changes to the City's existing visual character.

Lastly, the FEIR found that *impacts related to light and glare also would be less than significant* under the 2009 Housing Element because any new exterior lighting introduced as part of future residential development would be focused on specific areas, rather than lighting wide, currently unlit areas, and new

development would be required to comply with City Resolution 9212, which prohibits the use of highly reflective or mirrored glass in new construction.

Proposed Project

As noted above, the 2014 Housing Element would continue all of the 2009 Housing Element objectives and policies, and most of the implementation measures which direct growth to certain areas of the City, promote increased density standards, promote preservation of residential buildings, promote energy-efficient housing development, and promote locating housing in proximity to job cores, neighborhood services and along transit routes. The 2014 Housing Element does not propose any specific projects, or zoning changes, and zoning changes are not required to under state law, because the City currently has available capacity to meet the RHNA. Moreover, the 2014 Housing Element would not directly result in increases to population, as residential growth during the Planning Period would occur regardless of Housing Element policies. The 2014 Housing Element would instead continue to provide direction for how new residential development in the City should occur, with an emphasis on affordability. Consistent with the Planning Department's regular practice, the FEIR did not attribute any difference in environmental impacts to affordable housing as compared to market-rate housing.¹³ Therefore, as concluded in the FEIR for the 2009 Housing Element, the implementation of those same policies through the 2014 Housing Element would likewise result in less-than-significant impacts with respect to aesthetics.

The additional policies contained in the proposed 2014 Housing Element do not modify or address allowable building height and bulk, the two main factors that can potentially impact scenic vistas. As noted throughout this Addendum, the five policies added to the 2014 Housing Element would not be expected to result in physical impacts that would adversely affect the environment. Added policies 5.5, 5.6, 6.3, and 6.4 would result in administrative changes to the City's programs that serve low-income, homeless, and displaced populations but would not be expected to result in any physical changes to the environment. Moreover, they were part of the 2004 Housing Element and were previously considered in the FEIR. Added Policy 2.6 would ensure that housing supply is not converted to de factor commercial use through short-term rentals. This policy would also not result in any environmental impacts, since it encourages the continuation of the status quo with respect to maintaining existing housing stock and use. To the degree that these additional policies could lead to more affordable housing projects than would otherwise be constructed, there is no evidence that such projects would result in more severe impacts with respect to aesthetics than were identified in the FEIR. This is because those affordable housing projects would have similar operational characteristics as market rate housing and would be subject to the same regulations related to visual quality (i.e., Residential Design Guidelines, etc.).

The three new implementation programs also would not be expected to result in physical impacts that would adversely affect the environment. Implementation Program 19 supports Policy 2.6, which would reinforce the status quo related to existing housing. Implementation Program 38b implements a density bonus program that already exists under State law (Government Code Section 65915). Finally, Implementation Program 64 promotes affordable housing; as noted above affordable housing was

13 The Planning Department does assume reduced traffic impacts for 100% affordable housing projects because of demonstrated lower vehicle ownership rates for affordable housing residents. However, to represent a worst-case scenario, the FEIR did not apply the reduced automobile trip generation rate and instead assumed that all housing would generate automobile trips at the same rate regardless of affordability.

already assumed as part of the FEIR and would not increase environmental impacts due to the similar operational characteristics as market-rate housing.

Based on the foregoing, the 2014 Housing Element would not change or alter any of the FEIR's findings with respect to impacts to aesthetics and would not require any new mitigation measures. Additionally, there are no changed circumstances or new information that would change the FEIR's impact findings with respect to aesthetics.

Population and Housing

2009 Housing Element

As discussed in the FEIR, the 2009 Housing Element would not change the land use objectives and policies in the City's area and redevelopment plans. At the time of the preparation of the FEIR, the City had available capacity to meet the 2009-2014 RHNA goals; therefore, the rezoning of land uses was not required. As discussed in the FEIR, the 2009 Housing Element policies are designed to encourage housing growth projected by ABAG where it can best be accommodated (i.e. near transit, where supported by infrastructure, or through community planning processes). Hence, the FEIR found that the 2009 Housing Element *would not induce a substantial amount of population growth* not otherwise anticipated by the ABAG regional projections, and impacts on population growth under the 2009 Housing Element would be less than significant.

The FEIR also found that the 2009 Housing Element *also would not displace substantial number of existing housing units or create demand for additional housing*. New construction would be required to comply with regulations that limit the demolition and merger of housing units, thus reducing impacts associated with replacing existing housing units, or necessitating the construction of replacement housing. Additionally, the 2009 Housing Element contains policies that promote the preservation of existing housing units, further reducing the potential of displacing existing housing units. Since the 2009 Housing Element was found to no induce a substantial amount of population growth (as discussed in the above paragraph), it was therefore also found to no create demand for additional housing. Therefore, the FEIR found that the 2009 Housing Element would result in a less-than-significant impact with respect to the displacement of existing housing units, demand for additional housing, or the need for construction of replacement housing.

Lastly, the 2009 Housing Element was found to result in a *less-than-significant impact related to the displacement of people*. As discussed above, the FEIR found that there would be no significant impacts related to the displacement of housing; therefore the 2009 Housing Element would not displace substantial numbers of people.

Proposed Project

The 2014 Housing Element would continue all of the 2009 Housing Element objective and policies, and most of the implementation measures which direct growth to certain areas of the City, promote increased density standards, promote preservation of residential buildings, promote energy-efficient housing development, and promote locating housing in proximity to job cores, neighborhood services and along transit routes. The 2014 Housing Element does not propose any specific projects, or zoning changes, and zoning changes are not required to under state law, because the City currently has available capacity to meet the RHNA. Moreover, the 2014 Housing Element would not directly result in increases to population, as residential growth during the Planning Period would occur regardless of Housing Element

policies. The 2014 Housing Element would instead continue to provide direction for how new residential development in the City should occur, with an emphasis on affordability. The FEIR did not attribute any difference in environmental impacts to affordable housing as compared to market-rate housing. Therefore, as concluded in the FEIR for the 2009 Housing Element, the implementation of those same policies through the 2014 Housing Element would likewise result in less-than-significant impacts with respect to population and housing.

The 2014 Housing Element would facilitate the achievement of the RHNA, which is calculated based on ABAG's projections. As discussed in the Project Description above, the updated calculation of San Francisco's share of the regional housing need is for the 2014 Housing Element planning period is 28,869 units (compared to 31,193 housing units in the 2009 Housing Element) or 3,849 units per year (compared to 4,159 units per years in the 2009 Housing Element). However, the 2014 Housing Element would neither permit nor incentivize any individual project to move forward. Rather, any new development within the City must be consistent with the San Francisco General Plan, as well as any applicable area plans, design guidelines, and zoning codes (including development standards) that are intended to limit impacts related to population and housing and would also be subject to independent CEQA review. Moreover, the assignment of the RHNA is not done by the City and not under consideration in the 2014 Housing Element. Furthermore, CEQA does not apply to regional housing needs determinations made by the HCD, a council of governments, or a city or county pursuant to Section 65584 of the Government Code.

The five policies added to the 2014 Housing Element would not be expected to result in physical impacts that would adversely affect the environment. Added policies 5.5, 5.6, 6.3, and 6.4 would result in administrative changes to the City's programs that serve low-income, homeless, and displaced populations but would not be expected to result in any physical changes to the environment. Moreover, they were part of the 2004 Housing Element and were previously considered in the FEIR. Added Policy 2.6 would ensure that housing supply is not converted to de factor commercial use through short-term rentals. This policy would also not result in any environmental impacts, since it encourages the continuation of the status quo with respect to maintaining existing housing stock and use. It is possible that with the addition of these policies, the 2014 Housing Element is less likely to lead to displacement as compared to the 2009 Housing Element.

To the degree that these additional policies could lead to more affordable housing projects than would otherwise be constructed, there is no evidence that such projects would result in more severe impacts with respect to population and housing than were identified in the FEIR. This is because those affordable housing projects would have similar operational characteristics as market rate housing.

The three new implementation programs also would not be expected to result in physical impacts that would adversely affect the environment. Implementation Program 19 supports Policy 2.6, which would reinforce the status quo related to existing housing. Implementation Program 38b implements a density bonus program that already exists under State law (Government Code Section 65915). Finally, Implementation Program 64 promotes affordable housing; as noted above affordable housing was already assumed as part of the FEIR and would not increase environmental impacts due to the similar operational characteristics as market-rate housing.

Based on the foregoing, the 2014 Housing Element would not change or alter any of the FEIR's findings with respect to population and housing impacts and would not require any new mitigation measures. Additionally, there are no changed circumstances or new information that would change the FEIR's impact findings with respect to population and housing.

Cultural and Paleontological Resources

2009 Housing Element

The FEIR found that implementation of the 2009 Housing Element could have a significant impact or a substantial adverse change on historic resources if it promoted inappropriate alterations and/or additions, inappropriate new construction, or demolition by neglect.¹⁴ As reported in the FEIR, although the 2009 Housing Element would not directly result in the construction of residential units, it would direct housing to certain locations (where residential growth is deemed appropriate), which could result in new construction within Article 10 and Article 11 areas, or other areas of the City with known or potential historical resources. The FEIR found that this type of development could result in indirect impacts upon these resources through demolition, removal of character defining features, alteration or inappropriate new construction. However, any potential impacts related to inappropriate alterations and/or additions, inappropriate new construction, and demolition by neglect would be offset by compliance with federal, state, and local regulations, including: the Secretary of the Interior's Standards for the Treatment of Historic Properties, CEQA, Section 106 of the National Historic Preservation Act, The City of San Francisco's Preservation Bulletins Nos. 1-21, Articles 10 and 11 of the City of San Francisco's Planning Code, the Urban Design Element of the San Francisco General Plan, the California Historic Building Code, the San Francisco Residential Design Guidelines, and other design guidelines (such as those related to window replacement or storefronts).

Furthermore, the FEIR noted that Planning Department procedures for site-specific review of all projects with the potential to affect historic resources ensures that any potential to affect historic resources at the project-level would be evaluated as part of the project approval process. Hence, given these procedures and the fact that the 2009 Housing Element would not permit any new development or exempt any future projects from review for impacts to historic resources, the FEIR found that it would have a *less-than-significant impact with respect to the substantial adverse change to a historic resource*.

The FEIR also found that the 2009 Housing Element would have a *less-than-significant impact with respect to the substantial adverse change to an archeological resource*. As discussed in the FEIR, any effects to archeological resources are only knowable once a specific project has been proposed, because they are highly dependent on both the individual project site conditions and the characteristics of the proposed ground-disturbing activity. The FEIR found that, because the potential for impacts to archeological resources is appropriately addressed at the project level, where the site specific characteristics of archeological resources can be evaluated with respect to a given project proposal, and given that the City has well-established review criteria and procedures to evaluate impacts to archeological resources at the project-level, the 2009 Housing Element was determined to have a less significant impact with respect to a substantial adverse change to an archeological resource.

Lastly, the FEIR found that the 2009 Housing Element would have a *less-than-significant impact with respect to the paleontological resources or unique geologic features*, since any potential impacts associated with future development would be offset by compliance with regulations which are required by law, including the National Historic Preservation Act. Similarly, the FEIR found that the 2009 Housing Element would have a *less-than-significant impact with respect to the disturbance of human remains*, since any potential impacts associated with future development would be offset by compliance with existing laws and regulations,

¹⁴ CEQA defines "substantial adverse change" as "demolition, destruction, relocation or alteration," activities that would impair the significance of a historical resource either directly or indirectly. Demolition by neglect is the gradual deterioration of a building when routine or major maintenance is not performed and/or is allowed by the owner to remain vacant and open to vandals.

including Sections 7050.5, 7051, and 7054 of the California Health and Safety Code and Public Resources Code Section 5097.98.

Proposed Project

The 2014 Housing Element would not revise any of the existing laws, regulations, or Planning Department procedures that reduce impacts to historic, archeological, paleontological, and human remains. As noted above, the 2014 Housing Element would continue all of the 2009 Housing Element objectives and policies, and most of the implementation measures which direct growth to certain areas of the City, promote increased density standards, promote preservation of residential buildings, promote energy-efficient housing development, and promote locating housing in proximity to job cores, neighborhood services and along transit routes. The 2014 Housing Element does not propose any specific projects, or zoning changes, and zoning changes are not required under state law, because the City currently has available capacity to meet the RHNA. Moreover, the 2014 Housing Element would not directly result in increases to population, as residential growth during the Planning Period would occur regardless of Housing Element policies. The 2014 Housing Element would instead continue to provide direction for how new residential development in the City should occur, with an emphasis on affordability. The FEIR did not attribute any difference in environmental impacts to affordable housing as compared to market-rate housing. Therefore, as concluded in the FEIR for the 2009 Housing Element, the implementation of those same policies through the 2014 Housing Element would likewise result in less-than-significant impacts with respect to cultural and paleontological resources.

As noted throughout this Addendum, the five policies added to the 2014 Housing Element would not be expected to result in physical impacts that would adversely affect the environment. Added policies 5.5, 5.6, 6.3, and 6.4 would result in administrative changes to the City's programs that serve low-income, homeless, and displaced populations but would not be expected to result in any physical changes to the environment. Moreover, they were part of the 2004 Housing Element and were previously considered in the FEIR. Added Policy 2.6 would ensure that housing supply is not converted to de facto commercial use through short-term rentals. This policy would also not result in any environmental impacts, since it encourages the continuation of the status quo with respect to maintaining existing housing stock and use. To the degree that these additional policies could lead to more affordable housing projects than would otherwise be constructed, there is no evidence that such projects would result in more severe impacts with respect to cultural and paleontological resources than were identified in the FEIR. This is because those affordable housing projects would have similar operational characteristics as market rate housing and would be subject to the same regulations related to how cultural and paleontological resources are protected.

The three new implementation programs would also not be expected to result in physical impacts that would adversely affect the environment. Implementation Program 19 supports Policy 2.6, which would reinforce the status quo related to existing housing. Implementation Program 38b implements a density bonus program that already exists under State law (Government Code Section 65915). Finally, Implementation Program 64 promotes affordable housing; as noted above affordable housing would not increase environmental impacts due to the similar operational characteristics as market-rate housing.

Based on the foregoing, the 2014 Housing Element would not change or alter any of the FEIR's findings with respect to impacts to cultural and paleontological resources and would not require any new mitigation measures. Additionally, there are no changed circumstances or new information that would change the FEIR's impact findings with respect to cultural and paleontological resources.

Transportation and Circulation

2009 Housing Element

As discussed in the FEIR, the 2009 Housing Element contains policies that aim to direct growth to certain areas of the City, allow reductions in parking requirements and generally increase density in certain areas through a Better Neighborhoods type planning process. These policies are designed to encourage residential development that can take advantage of alternative modes of transportation, including transit, walking, and bicycling, thereby reducing impacts to the City's roadway network that would otherwise occur.

The FEIR found that implementation of the 2009 Housing Element would result in a *less-than-significant impact related to traffic, pedestrians, bicycles, loading, emergency access, and construction-related transportation impacts (as discussed further below); however, the FEIR found that it would result in a significant unavoidable transit impact*, because policies in the 2009 Housing Element which encouraged residential development that can take advantage of transit – such as locating housing near transit - could result in a mode shift towards public transit, which could result in an exceedance of Muni's capacity utilization standard of 85 percent (although such a mode shift would nevertheless be in keeping with the City's Transit First Policy). The FEIR found that of the two possible ways to mitigate this impact – the first is for the City to implement various transportation plans¹⁵ and programs that would reduce congestion and decrease transit travel times, and the second is for SFMTA to increase capacity by providing more buses - the certainty of either of these mitigation measures had not been established at the time of the preparation of the FEIR and, for these reasons, the FEIR concluded that impact on transit would remain significant and unavoidable.

The FEIR found that, because the 2009 Housing Element policies are not development-specific, adoption of the updated policies themselves would not add any additional trips citywide, generate new pedestrian or bicycle trips, generate net new loading demand or generate any vehicle trips related to construction of specific developments. The FEIR found that, under 2025 Cumulative Conditions, traffic volumes would substantially increase throughout the City, resulting in noticeable increases in the average delays per vehicle at many of the study intersections and that, under 2025 Cumulative Conditions, 37 of the study intersections would operate at unacceptable levels. The FEIR stressed that the 2009 Housing Element is not trip-generating and the 37 identified intersections would operate at unacceptable level of service irrespective of whether the 2009 Housing Element is approved.

As noted above, the FEIR also found that the 2009 Housing Element policies would have a less-than-significant impact on citywide pedestrian and bicycle facilities. This is because the 2009 Housing Element policies would not adversely affect overall operations of pedestrian or bicycle facilities and would instead direct growth in areas already well served by modes other than auto, including pedestrian and bicycle facilities. Similarly, the FEIR also found that the 2009 Housing Element policies would have a less-than-significant impact on citywide curb loading areas. This is because 2009 Housing Element policies were determined to not adversely affect overall loading operations. The FEIR also concluded that the 2009 Housing Element policies would have a less-than-significant impact on citywide emergency vehicle

15 The FEIR noted that various transportation plans were adopted, but not implemented, or proposed. Adopted plans/programs included SF Park, SF Go, San Francisco Bicycle Plan, Transbay Terminal, Caltrain Electrification, and High Speed Rail, and the Central Subway. Proposed plans included congestion pricing, SFMTA's Transit Effectiveness Project (TEP), Van Ness and Geary Bus Rapid Transit (VanNess BRT), and the Better Streets Plan. The TEP was approved in March 2014, Van Ness BRT was approved in November 2014, and the Better Streets Plan was adopted in December 2010.

access since they would not hinder emergency access and would also have a less-than-significant construction-related transportation impacts.

Based on the above, transportation impacts related to traffic, pedestrians, bicycles, loading, emergency access, and construction-related transportation impacts were concluded to be less than significant in the FEIR.

Proposed Project

As under the 2009 Housing Element, future residential growth under the 2014 Housing Element will occur regardless of its adoption. The 2014 Housing Element policies themselves would not directly generate new trips. Under 2025 Cumulative Condition, the 37 intersections studied in the FEIR are expected to continue to operate at unacceptable levels. However, the implementation of the Housing Element is not trip generating and intersections operating at unacceptable level of service would do so irrespective of whether the proposed 2014 Housing Element is approved.

The 2014 Housing Element would continue all of the 2009 Housing Element objectives and policies and most of the implementation measures which direct growth to certain areas of the City, promote increased density standards, promote preservation of residential buildings, promote energy-efficient housing development, and promote locating housing in proximity to job cores, neighborhood services and along transit routes. The FEIR found that, because the 2009 Housing Element policies are not development-specific, adoption of the updated policies themselves would not add any additional trips citywide, generate new pedestrian or bicycle trips, generate net new loading demand or generate any vehicle trips related to construction of specific developments. The FEIR found that, under 2025 Cumulative Conditions, traffic volumes would substantially increase throughout the City, resulting in noticeable increases in the average delays per vehicle at many of the study intersections and that, under 2025 Cumulative Conditions, 37 of the study intersections would operate at unacceptable levels. The FEIR stressed that the 2009 Housing Element is not trip-generating and the 37 identified intersections would operate at unacceptable level of service irrespective of whether the 2009 Housing Element is approved. Therefore, all impacts identified in the FEIR with respect to traffic, pedestrians, bicycles, loading, emergency access, and construction-related transportation impact would continue to be less than significant with the changes in the 2014 Housing Element. However, because the 2014 Housing Element would continue the policies that could result in a mode shift toward public transit, which could potentially exceed Muni's capacity utilization standard of 85 percent, the significant unavoidable transit impact that was identified in the FEIR would remain, although it is not expected to substantially worsen, as discussed below. As discussed above, under Setting, through the passing of Propositions A and B, additional funding will be provided to the Municipal Transportation Agency to improve Muni services and street safety. This funding is intended to go toward addressing the transit capacity issues; therefore, it is possible that this significant and unavoidable impact may be reduced in the future.

The five policies added to the 2014 Housing Element would not be expected to result in physical impacts that would adversely affect the environment. Added policies 5.5, 5.6, 6.3, and 6.4 would result in administrative changes to the City's programs that serve low-income, homeless, and displaced populations but would not be expected to result in any physical changes to the environment. Moreover, they were part of the 2004 Housing Element and were previously considered in the FEIR. Added Policy 2.6 would ensure that housing supply is not converted to de factor commercial use through short-term rentals. This policy would also not result in any environmental impacts, since it encourages the continuation of the status quo with respect to maintaining existing housing stock and use.

To the degree that these additional policies could lead to more affordable housing projects than would otherwise be constructed, there is no evidence that such projects would result in more severe impacts with respect to transportation and circulation than were identified in the FEIR. This is because those affordable housing projects would have similar operational characteristics as market rate housing and would not generate substantially more vehicle, bicycle, transit or pedestrian trips than is typically generated with market-rate housing.

The three new implementation programs also would not be expected to result in physical impacts that would adversely affect the environment. Implementation Program 19 supports Policy 2.6, which would reinforce the status quo related to existing housing. Implementation Program 38b implements a density bonus program that already exists under State law (Government Code Section 65915). Finally, Implementation Program 64 promotes affordable housing; as noted above affordable housing was already assumed as part of the FEIR and would not increase environmental impacts due to the similar operational characteristics as market-rate housing.

Based on the foregoing, implementation of the 2014 Housing Element would not change or alter any of the FEIR's findings with respect to transportation and circulation impacts and would not require any new mitigation measures. Additionally, there are no changed circumstances or new information that would change the FEIR's impact findings with respect to transportation and circulation.

Noise

2009 Housing Element

As discussed in the FEIR, the 2009 Housing Element includes policies that direct growth primarily through the community planning process, but also includes policies that direct housing to commercial areas and sites that are near transit. The FEIR found that this could result in a substantial temporary or periodic increase in ambient noise levels associated with new construction for certain areas of the City, since these policies could consolidate new construction within those areas and incrementally increase average construction duration associated with new housing in those areas. However, as reported in the FEIR, the 2009 Housing Element also contains policies that discourage demolition and encourage the maintenance of the City's existing housing stock, thereby reducing the amount of new housing required to meet the City's housing needs and subsequent noise-related impacts resulting from construction activities (which are usually mitigable to a less-than-significant impact through adherence to the City's Noise Ordinance [Article 29 of the San Francisco Police Code]); thus, the FEIR found that this would reduce construction-related noise activities and, ultimately, *would result in a less-than-significant impact with respect to a substantial temporary or periodic increase in ambient noise levels.*

The FEIR also found that the 2009 Housing Element *would not result in an exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels.* Although the 2009 Housing Element would not result in construction of residential units, the FEIR noted that it would shape how new residential development should occur and would ensure that there is adequate land available to meet future housing needs. Potential impacts related to groundborne noise and vibration resulting from construction activities were found to be offset by compliance with federal, state, and local regulations including Article 29 of the San Francisco Police Code, which regulates construction-related noise. Therefore, the 2009 Housing Element was found to have a less-than-significant impact with respect to the generation of excessive groundborne vibration or groundborne noise.

The FEIR also found that the 2009 Housing Element *would not result in a substantial permanent increase in ambient noise levels* in the project vicinity above levels existing at the time of the NOP. New residential development would be required to comply with existing federal, state and local regulations, including Article 29 of the Police Code and, thus, would generally reduce impacts associated with a permanent increase in ambient noise levels to less than significant.

Lastly, the FEIR found that the 2009 Housing Element could expose noise sensitive receptors to noise levels in excess of established standards or be affected by existing noise levels if the Housing Element policies promoted new residential land uses in areas of the City that experience excessive ambient noise levels. Ambient noise levels in the City are largely influenced by traffic-related noise as well as noise generated from stationary sources (such as rooftop mechanical equipment, emergency generators, etc.). Moreover, a large portion of the City, particularly the eastern half, experiences ambient noise levels above 60 Ldn while some areas are subject to ambient noise levels greater than 75 Ldn. The FEIR found that future growth within the City could be sited in areas with noise levels above 60 Ldn, which is the maximum satisfactory exterior noise level for residential areas. As discussed above, interior noise levels are typically addressed through compliance with Title 24 building code requirements, as implemented during the design and review phase for individual development projects. However, some areas of the City may be especially noisy. FEIR Mitigation Measure M-NO-1, which is reproduced in the Mitigation Measures section below, was developed to reduce the 2009 Housing Element's impact on noise sensitive receptors to a less-than-significant level (with mitigation). Thus, the FEIR found that the 2009 Housing Element would result in a *significant but mitigable impact related to exposure of persons to, or generation of noise levels in excess of, established standards*.

Proposed Project

As noted above, the 2014 Housing Element would continue all of the 2009 Housing Element objectives and policies, and most of the implementation measures which direct growth to certain areas of the City, promote increased density standards, promote preservation of residential buildings, promote energy-efficient housing development, and promote locating housing in proximity to job cores, neighborhood services and along transit routes. The 2014 Housing Element does not propose any specific projects, or zoning changes, and zoning changes are not required under state law, because the City currently has available capacity to meet the RHNA. Moreover, the 2014 Housing Element would not directly result in increases to population, as residential growth during the Planning Period would occur regardless of Housing Element policies. The 2014 Housing Element would instead continue to provide direction for how new residential development in the City should occur, with an emphasis on affordability. The FEIR did not attribute any difference in environmental impacts to affordable housing as compared to market-rate housing. Therefore, as concluded in the FEIR for the 2009 Housing Element, the implementation of those same policies through the 2014 Housing Element would likewise result in less-than-significant-with-mitigation impacts with respect to noise sensitive receptors and less-than-significant impacts with respect to other noise-related impacts.

As noted throughout this Addendum, the five policies added to the 2014 Housing Element would not be expected to result in physical impacts that would adversely affect the environment. Added policies 5.5, 5.6, 6.3, and 6.4 would result in administrative changes to the City's programs that serve low-income, homeless, and displaced populations but would not be expected to result in any physical changes to the environment. Moreover, they were part of the 2004 Housing Element and were previously considered in the FEIR. Added Policy 2.6 would ensure that housing supply is not converted to de facto commercial use through short-term rentals. This policy would also not result in any environmental impacts, since it

encourages the continuation of the status quo with respect to maintaining existing housing stock and use. To the degree that these additional policies could lead to more affordable housing projects than would otherwise be constructed, there is no evidence that such projects would result in more severe impacts with respect to noise than were identified in the FEIR. This is because those affordable housing projects would have similar operational characteristics as market rate housing.

The three new implementation programs would also not be expected to result in physical impacts that would adversely affect the environment. Implementation Program 19 supports Policy 2.6, which would reinforce the status quo related to existing housing. Implementation Program 38b implements a density bonus program that already exists under State law (Government Code Section 65915). Finally, Implementation Program 64 promotes affordable housing; as noted above affordable housing was already assumed as part of the FEIR and would not increase environmental impacts due to the similar operational characteristics as market-rate housing.

Based on the foregoing, the 2014 Housing Element would not change or alter any of the FEIR's findings with respect to impacts related to noise and would not require any new mitigation measures. Additionally, there are no changed circumstances or new information that would change the FEIR's impact findings with respect to noise.

Air Quality

2009 Housing Element

The FEIR found that the 2009 Housing Element would have a *less-than-significant impact with respect to consistency with the applicable air quality plan*. As reported in the FEIR, consistency of the proposed Housing Elements with regional air quality plans can be determined by comparing the growth factors used for the Housing Element EIR with those used in the most recently adopted regional air quality plan, which at the time of the NOP was *Bay Area 2005 Ozone Strategy*. The *2005 Ozone Strategy* growth assumptions for Bay Area communities are based on ABAG's Projections. The growth projections for the Housing Element EIRs are based on the regional population and employment projections provided by ABAG. As both the Housing Elements and the *2005 Ozone Strategy* utilize ABAG projections, the FEIR concluded that the 2009 Housing Element would not result in a significant impact on regional air quality planning efforts.

The FEIR also determined that the 2009 Housing Element would result in a *less-than-significant impact with respect to violating an air quality standard or contributing substantially to an existing or projected air quality violation*. As reported in the FEIR, the 2009 Housing Element contains policies that could contribute incrementally to an existing or projected air quality violation by directing residential development to certain areas of the City and promoting increased density, thereby concentrating construction-related emissions from residential development within those areas and potentially contributing to localized air quality impacts. However, as discussed in the FEIR, the 2009 Housing Element also contains policies that would offset construction-related air quality impacts by discouraging housing demolition, and encouraging maintenance of existing housing units. Moreover, new construction would be required to comply with existing regulations, including compliance with Article 22B, the Construction Dust Ordinance, which would reduce such impacts to a less-than-significant level.

As reported in the FEIR, with respect to operational impacts, the Air Quality Element of the General Plan promotes policies that take advantage of the high density development in San Francisco to improve transit infrastructure, to encourage high density and compact development near extensive transportation infrastructure, to encourage mixed land use development near transit lines, to provide retail and service-

oriented uses within walking distance, and to promote new residential development close to Downtown and centers of employment. As noted in the FEIR, the 2009 Housing Element, which promotes housing in proximity to transit, could potentially reduce anticipated growth in vehicle miles traveled, and could thus result in less vehicle emissions (the primary source of emissions) than expected from development not targeted near transportation resources. Moreover, as reported in the FEIR, the 2009 Housing Element contains policies that could further reduce the effects of new development on air quality by encouraging energy efficient housing development, which, when combined with mandatory compliance with the San Francisco Green Building Ordinance (SFGBO) for all new projects, could reduce the growth of vehicle emissions and stationary source emissions associated with residential development.

The FEIR also determined that the 2009 Housing Element would have a *less-than-significant impact with respect to exposing sensitive receptors to substantial pollutants*. Increased housing development along transit corridors could increase some pollutants, including, PM_{2.5} NO₂, and TACs, on some roadways within San Francisco. However, at the same time, increased density and associated shifts from vehicle trips to alternative modes of transportation (such as transit, bicycling, and walking) could reduce overall expected growth of vehicle trips and VMT, as discussed in the Transportation and Circulation section. Overall, future growth will continue to contribute some additional air pollutant emissions, albeit less than would be expected from a Housing Element without policies encouraging increased density and housing that is supportive of alternative modes of transportation.

As discussed in the FEIR, residential development could occur within areas with existing elevated levels of toxic air contaminant, potentially exposing residents to existing elevated levels of TACs, PM_{2.5}, and NO₂. The FEIR noted that policies contained in the Air Quality Element and Transportation Element of the General Plan, as well as rules codified in Article 38 of the Health Code, would reduce the impacts of the 2009 Housing Element policies that advocate for housing potentially near sources of air pollution. General Plan Air Quality Element policy 3.7 requires that review of new housing projects consider the location of industrial sites or other sources of air pollution in the design of the residential building and to orient air intakes away from sources of pollution. Policy 3.8 promotes non-polluting industries and insists compliance with established industrial emission control regulations by existing industries.

Further, Article 38 of the San Francisco Health Code contains requirements for air quality assessment and mitigation when new residential exposures exceed action levels for acceptable air pollutant concentrations. Overall, the City's Air Quality Element and Transportation Element policies, in conjunction with compliance with Article 38 of the Health Code, would reduce impacts of new residences being exposed to substantial pollutants, including mobiles sources (vehicles) and point sources (industry), by reducing exposure of residences to air pollutants and considering the location of new development in relation to existing sources of air pollution. Thus, the FEIR concluded that the potential for the 2009 Housing Elements to expose sensitive residential receptors to substantial pollutants was less than significant.

The FEIR also determined that the 2009 Housing Element *would result in less-than-significant impacts related to CO concentrations*. To support this conclusion, CO concentrations were calculated based on simplified CALINE4 screening procedures developed by the Bay Area Air Quality Management District (BAAQMD). Based on the modeling, under future 2025 conditions, none of the 10 worst-performing intersections included in the model would exceed CO standards. Thus, it was assumed that if CO levels at the 10 worst-performing intersections do not exceed the CO thresholds, then the remaining 50 intersections analyzed in the traffic study also would not exceed the CO thresholds. As discussed in the FEIR, the 2009 Housing Element promotes housing near transit and other infrastructure, housing in

proximity to neighborhood services, and housing within mixed-use areas. This was found to have the potential to reduce the number of vehicle trips and/or VMT, thus reducing vehicle emissions. In addition, several 2009 Housing Element implementing measures (90, 98, 100, and 101) were found to emphasize the coordination of planning for both housing and supporting transit services and providing incentives to residents and employees for utilizing public transit or other alternative modes of transportation, thereby promoting a reduction in vehicle trips. Based on the above, the FEIR concluded that impacts related to CO concentrations would be less than significant.

The FEIR also concluded that implementation of the 2009 Housing Element would result in *less-than-significant impacts with respect to objectionable odors* because residential uses generally do not create objectionable odors and thus, 2009 Housing Element policies that promote residential development would not result in objectionable odors.

Proposed Project

In December 2014, the San Francisco Board of Supervisors approved a series of amendments to the San Francisco Building and Health Codes, generally referred to as the Enhanced Ventilation Required for Urban Infill Sensitive Use Developments or Health Code, Article 38 (Ordinance 224-14, effective December 8, 2014) (Article 38). The purpose of Article 38 is to protect the public health and welfare by establishing an Air Pollutant Exposure Zone and imposing an enhanced ventilation requirement for all urban infill sensitive use development within the Air Pollutant Exposure Zone. The Air Pollutant Exposure Zone as defined in Article 38 are areas that, based on modeling of all known air pollutant sources, exceed health protective standards for cumulative PM_{2.5} concentration, cumulative excess cancer risk, and incorporates health vulnerability factors and proximity to freeways. Projects within the Air Pollutant Exposure Zone require special consideration to determine whether the project's activities would expose sensitive receptors to substantial air pollutant concentrations or add emissions to areas already adversely affected by poor air quality. If such an exposure is determined to be likely, future projects are subject to enhanced ventilation measures pursuant to Health Code Article 38. Through this ordinance, impacts related to exposure of sensitive receptors to substantial air pollutant concentrations within Air Pollutant Exposure Zone would be reduced.

As noted above, the 2014 Housing Element would continue all of the 2009 Housing Element objectives and policies, and most of the implementation measures which direct growth to certain areas of the City, promote increased density standards, promote preservation of residential buildings, promote energy-efficient housing development, and promote locating housing in proximity to job cores, neighborhood services and along transit routes. The 2014 Housing Element does not propose any specific projects, or zoning changes, and zoning changes are not required under state law, because the City currently has available capacity to meet the RHNA. Moreover, the 2014 Housing Element would not directly result in increases to projected population, as residential growth during the Planning Period would occur regardless. The Housing Element would instead continue to provide direction for how new residential development in the City should occur, with an emphasis on affordability. The FEIR did not attribute any difference in environmental impacts to affordable housing as compared to market-rate housing. Therefore, as concluded in the FEIR for the 2009 Housing Element, the implementation of those same policies through the 2014 Housing Element would likewise result in less-than-significant impacts with respect air quality.

Moreover, the five policies added to the 2014 Housing Element would not be expected to result in physical impacts that would adversely affect the environment related to air quality. Added policies 5.5, 5.6, 6.3, and 6.4 would result in administrative changes to the City's programs that serve low-income,

homeless, and displaced populations but would not be expected to result in any physical changes to the environment. Moreover, they were part of the 2004 Housing Element and were previously considered in the FEIR. Added Policy 2.6 would ensure that housing supply is not converted to de facto commercial use through short-term rentals. This policy would also not result in any environmental impacts, since it encourages the continuation of the status quo with respect to maintaining existing housing stock and use. To the degree that these additional policies could lead to more affordable housing projects than would otherwise be constructed, there is no evidence that such projects would result in more severe impacts with respect to air quality than were identified in the FEIR. This is because those affordable housing projects would be substantially similar to market-rate housing and would be required to comply with the same regulations as any other project, including BAAQMD's *CEQA Air Quality Guidelines* (May 2011) and Article 38 of the Health Code.

The three new implementation programs also would not be expected to result in physical impacts that would adversely affect the environment. Implementation Program 19 supports Policy 2.6, which would reinforce the status quo related to existing housing. Implementation Program 38b implements a density bonus program that already exists under State law (Government Code Section 65915). Finally, Implementation Program 64 promotes affordable housing; as noted above affordable housing was already assumed as part of the FEIR and would not increase environmental impacts due to the similar operational characteristics as market-rate housing and would be subject to the same air quality regulations as market-rate housing.

Based on the foregoing, implementation of the 2014 Housing Element would not change or alter any of the FEIR's findings with respect to air quality impacts and would not require any new mitigation measures. Additionally, there are no changed circumstances or new information that would change the FEIR's air quality impact findings.

Greenhouse Gas Emissions

2009 Housing Element

The FEIR found that the 2009 Housing Element *would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment and would not conflict with any applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs.* Moreover, the FEIR noted that the 2009 Housing Element contains some policies that would be expected to reduce citywide housing-related GHG emissions (the primary source of which is vehicle emissions) by directing growth to certain areas of the City, promoting increased density standards, promoting the preservation of residential buildings, and promoting energy-efficient housing development. The 2009 Housing Element also contains policies that speak to housing in proximity to job cores, neighborhood services and along transit, which facilitate a reduction in the vehicle miles travelled and overall vehicle emissions.

Given that the 2009 Housing Element does not contain any policies that would result in substantial increases in the amount of GHGs emitted from new housing construction or from meeting the City's housing goals and it contains additional policies which may further reduce citywide GHG emissions, the FEIR found that the 2009 Housing Element would not result in GHG emissions that would have a significant effect on the environment, nor would it conflict AB 32 or the City's GHG reduction strategy. Thus the FEIR found these impacts to be less than significant.

Proposed Project

The 2014 Housing Element would continue all of the 2009 Housing Element objectives and policies, and most of the implementation measures which direct growth to certain areas of the City, promote increased density standards in certain areas, promote preservation of residential buildings, promote energy-efficient housing development, and promote locating housing in proximity to job cores, neighborhood services and along transit. The 2014 Housing Element does not propose any specific projects, or zoning changes, and zoning changes are not required under state law, because the City currently has available capacity to meet the RHNA. Moreover, the 2014 Housing Element would not directly result in increases to population, as residential growth during the Planning Period would occur regardless of Housing Element policies. The 2014 Housing Element would instead continue to provide direction for how new residential development in the City should occur, with an emphasis on affordability. The FEIR did not attribute any difference in environmental impacts to affordable housing as compared to market-rate housing. Therefore, as concluded in the FEIR for the 2009 Housing Element, the continuation of those same policies through the 2014 Housing Element would likewise result in less-than-significant impacts with respect to GHG emissions.

The five policies added to the 2014 Housing Element would not be expected to result in physical impacts that would adversely affect the environment related to GHG emissions. Added policies 5.5, 5.6, 6.3, and 6.4 would result in administrative changes to the City's programs that serve low-income, homeless, and displaced populations but would not be expected to result in any physical changes to the environment. Moreover, they were part of the 2004 Housing Element and were previously considered in the FEIR. Added Policy 2.6 would ensure that housing supply is not converted to de facto commercial use through short-term rentals. This policy would also not result in any environmental impacts, since it encourages the continuation of the status quo with respect to maintaining existing housing stock and use. To the degree that these additional policies could lead to more affordable housing projects than would otherwise be constructed, there is no evidence that such projects would result in more severe impacts with respect to GHG emissions than were identified in the FEIR. This is because those affordable housing projects would have similar operational characteristics as market rate housing and would be subject to the same policies and regulations that encourage energy-efficient housing and use of alternative modes of transportation.

The three new implementation programs also would not be expected to result in physical impacts that would adversely affect the environment. Implementation Program 19 supports Policy 2.6, which would reinforce the status quo related to existing housing. Implementation Program 38b implements a density bonus program that already exists under State law (Government Code Section 65915). Finally, Implementation Program 64 promotes affordable housing; as noted above affordable housing was already assumed as part of the FEIR and would not increase environmental impacts due to the similar operational characteristics as market-rate housing and would be subject to the same regulations that encourage energy-efficient housing and use of alternative modes of transportation.

Based on the foregoing, the 2014 Housing Element would not change or alter any of the FEIR's findings with respect to impacts to GHG emissions and would not require any new mitigation measures. Additionally, there are no changed circumstances or new information that would change the FEIR's impacts findings with respect to GHG emissions.

Wind and Shadow

2009 Housing Element

New construction could result in wind impacts if new housing would be constructed in a manner that would increase ground-level wind speeds. Typically, new development greater than 85 feet in height could potentially affect ground level wind speeds. Buildings that would result in wind speeds that exceed the hazard criterion of 26 miles per hour (mph) for one hour of the year would result in a significant wind impact.

The FEIR reported that the 2009 Housing Element would not in and of itself result in the construction of substantially taller buildings; however, it includes policies that could result in the exposure of people to wind impacts by encouraging new development to maximum allowable height and bulk limits (in certain areas of the City), potentially increasing building height and mass and thereby altering ground-level wind speeds. However, the FEIR reported that the 2009 Housing Element also includes policies that discourage demolition and encourage the maintenance of the City's existing housing stock, thereby reducing the amount of new housing required to meet the City's housing needs and subsequent wind-related impacts (as related to developing to maximum envelope). The FEIR found that, because wind impacts are project-specific and individual projects would be subject to the Planning Department's procedures requiring modification of any new building or addition that exceeds the wind hazard criterion, implementation of the 2009 Housing Element would have a less-than-significant impact with respect to the alteration of wind patterns. New residential development would be required to comply with existing regulations, including Sections 147, 148, 243(c)(9), 249.1(b)(2), and 263.11(c) of the San Francisco Planning Code, which regulate wind speeds through shaping of building masses. Thus, the FEIR found that the 2009 Housing Element *would not alter wind in a manner that substantially affects public areas.*

The FEIR also found that, because the 2009 Housing Element does not propose increased height limits in any areas, the effect of shadows would also be less than significant. Although promoting full buildout in certain areas of the City could incrementally increase actual building heights, new construction would be allowed to build to those heights regardless of the 2009 Housing Element. The FEIR noted that all applications for new construction or additions to existing buildings above 40 feet in height are reviewed by the Planning Department to determine whether such shading might occur. If a project would result in a new shadow, that shadow is evaluated for significance under CEQA. Furthermore, as stated in the FEIR, new residential development would be required to comply with existing regulations, including Sections 146(a), 146(c), and 295 of the San Francisco Planning Code, which trigger the preparation of shadow analyses, as required. Accordingly, the FEIR found that implementation of the 2009 Housing Element *would result in a less-than-significant impact with respect to the creation of new shadows.*

Proposed Project

The 2014 Housing Element would continue all of the 2009 Housing Element objectives and policies, and most of the implementation measures which direct growth to certain areas of the City, promote increased density standards, promote preservation of residential buildings, promote energy-efficient housing development, and promote locating housing in proximity to job cores, neighborhood services and along transit routes. The 2014 Housing Element does not propose any specific projects, or zoning changes, and zoning changes are not required under state law, because the City currently has available capacity to meet the RHNA. Moreover, the 2014 Housing Element would not directly result in increases to population, as residential growth during the Planning Period would occur regardless of Housing Element policies. The 2014 Housing Element would instead continue to provide direction for how new residential

development in the City should occur, with an emphasis on affordability. The FEIR did not attribute any difference in environmental impacts to affordable housing as compared to market-rate housing. Therefore, as concluded in the FEIR for the 2009 Housing Element, the implementation of those same policies in the 2014 Housing Element would likewise result in less-than-significant impacts with respect to wind and shadow.

The five policies added to the 2014 Housing Element would not be expected to result in physical impacts that would adversely affect the environment, including that related to wind or shadow. Added policies 5.5, 5.6, 6.3, and 6.4 would result in administrative changes to the City's programs that serve low-income, homeless, and displaced populations but would not be expected to result in any physical changes to the environment. Moreover, they were part of the 2004 Housing Element and were previously considered in the FEIR. Added Policy 2.6 would ensure that housing supply is not converted to de facto commercial use through short-term rentals. This policy would also not result in any environmental impacts, since it encourages the continuation of the status quo with respect to maintaining existing housing stock and use. To the degree that these additional policies could lead to more affordable housing projects than would otherwise be constructed, there is no evidence that such projects would result in more severe impacts with respect to wind and shadow than were identified in the FEIR. This is because those affordable housing projects would be subject to the same Planning Code requirements and procedures related to wind and shadow.

The three new implementation programs also would not be expected to result in physical impacts that would adversely affect the environment. Implementation Program 19 supports Policy 2.6, which would reinforce the status quo related to existing housing. Implementation Program 38b implements a density bonus program that already exists under State law (Government Code Section 65915). Finally, Implementation Program 64 promotes affordable housing; as noted above affordable housing was already assumed as part of the FEIR and would not increase environmental impacts due to the similar operational characteristics as market-rate housing and would be subject to the same Planning Code requirements and procedures related to wind and shadow.

Based on the foregoing, implementation of the 2014 Housing Element would not change or alter any of the FEIR's findings with respect to wind and shadow impacts and would not require any new mitigation measures. Additionally, there are no changed circumstances or new information that would change the FEIR's impacts findings with respect to wind and shadow.

Recreation

2009 Housing Element

The FEIR found that implementation of the 2009 Housing Element *would have a less-than-significant impact with respect to the construction or expansion of recreational facilities or the need for new or expanded park or recreational facilities*. As stated in the FEIR, the 2009 Housing Element would not result in new development. However, it contains policies that could direct growth to certain areas of the City, promote increased density standards, and potentially increase density in certain areas in a way that could place increased demands on existing facilities, thereby contributing to the need for new or expanded facilities or resulting in degradation of existing facilities. The FEIR found that these policies could also result in an increase in the number of residents using recreational facilities in certain areas and an increase in demand on existing recreational facilities. However, as reported in the FEIR, the 2009 Housing Element also contains policies that could reduce the need for construction or expansion of recreational facilities by encouraging quality of life elements in residential developments. For example, the FEIR reported that the

2009 Housing Element would ensure that new development resulting from community planning processes would be accompanied by capital plans for supporting infrastructure, including recreational facilities.

In addition, as noted in the FEIR, the 2009 Housing Element includes measures to ensure community plans are adequately served by recreation facilities, thereby indirectly promoting the construction or expansion of recreational facilities. Given the above, and the fact that new residential development would be subject to existing policies and regulations related to the provision of recreational facilities (such as Quimby Act, the San Francisco Park Code, Proposition C and the Recreation and Park Acquisition Policy, and various provisions in the San Francisco Planning Code Section 135), the FEIR concluded that this impact would be less than significant.

The FEIR also found that the 2009 Housing Element *would result in a less-than-significant impact with respect to the degradation of recreational resources*. As reported in the FEIR, it would direct growth to certain areas of the City and promote increased density-related development standards, which could potentially increase demands on existing recreational facilities. However, the City has identified open space acquisition/expansion independent of the proposed Housing Elements, pursuant to Proposition C and previous community planning efforts. In addition, the 2009 Housing Element does not propose any zoning changes, including changes to Public Districts, where much of the City's open space and recreational facilities are located.

Proposed Project

The 2014 Housing Element would continue all of the 2009 Housing Element objectives and policies, and most of the implementation measures which direct growth to certain areas of the City, promote increased density standards, promote preservation of residential buildings, promote energy-efficient housing development, and promote locating housing in proximity to job cores, neighborhood services and along transit routes. The 2014 Housing Element does not propose any specific projects, or zoning changes, and zoning changes are not required under state law, because the City currently has available capacity to meet the RHNA. Moreover, the 2014 Housing Element would not directly result in increases to population, as residential growth during the Planning Period would occur regardless of Housing Element policies. The 2014 Housing Element would instead continue to provide direction for how new residential development in the City should occur, with an emphasis on affordability. The FEIR did not attribute any difference in environmental impacts to affordable housing as compared to market-rate housing. Therefore, as concluded in the FEIR for the 2009 Housing Element, the continuation of those same policies in the 2014 Housing Element would likewise result in less-than-significant impacts with respect to recreational facilities.

The five policies added to the 2014 Housing Element would not be expected to result in physical impacts that would adversely affect the environment. Added policies 5.5, 5.6, 6.3, and 6.4 would result in administrative changes to the City's programs that serve low-income, homeless, and displaced populations but would not be expected to result in any physical changes to the environment. Moreover, they were part of the 2004 Housing Element and were previously considered in the FEIR. Added Policy 2.6 would ensure that housing supply is not converted to de factor commercial use through short-term rentals. This policy would also not result in any environmental impacts, since it encourages the continuation of the status quo with respect to maintaining existing housing stock and use. To the degree that these additional policies could lead to more affordable housing projects than would otherwise be constructed, there is no evidence that such projects would result in recreational impacts of greater magnitude than were identified in the FEIR. This is because those affordable housing projects would also

be subject to the same Planning Code and other provisions that require and encourage establishment of open space as market-rate housing.

The three new implementation programs also would not be expected to result in physical impacts that would adversely affect the environment. Implementation Program 19 supports Policy 2.6, which would reinforce the status quo related to existing housing. Implementation Program 38b implements a density bonus program that already exists under State law (Government Code Section 65915). Finally, Implementation Program 64 promotes affordable housing; as noted above affordable housing was already assumed as part of the FEIR and would not increase environmental impacts due to the similar operational characteristics as market-rate housing and would be subject to the same Planning Code and other provisions that require and encourage establishment of open space as market-rate housing.

Based on the foregoing, the 2014 Housing Element would not change or alter any of the FEIR's findings with respect to impacts to recreational facilities and would not require any new mitigation measures. Additionally, there are no changed circumstances or new information that would change the FEIR's impact findings with respect to recreational facilities.

Utilities and Service Systems

2009 Housing Element

Water and Wastewater Treatment. The FEIR found that the 2009 Housing Element *would have a less-than-significant impact with respect to the exceedance of wastewater treatment requirements.* As reported, the 2009 Housing Element would not directly result in the construction of residential units; however it includes policies that could result in an increased demand on water or wastewater treatment facilities by promoting the intensification of uses on undeveloped or underdeveloped sites. However, the 2009 Housing Element also contains policies that could reduce any effects related to water or wastewater treatment facilities by identifying suitable housing sites, considering neighborhood service availability for new housing, ensuring sustainable water and wastewater infrastructure capacity, and encouraging water conservation measures for new housing. Moreover, the density-related 2009 Housing Element policies could potentially indirectly result in the construction of a greater proportion of multi-family housing, which use less water than single-family housing. As further reported in the FEIR, potential impacts related to water and wastewater treatment would be offset by compliance with existing regulations and policies, including Article 4.1 of the San Francisco Public Works Code, Water Quality Protection Program, the City's Stormwater Management Plan, the City's Construction Site Runoff Pollution Prevention Program requirements, and San Francisco Public Utilities Commission's (SFPUC) Recycled Water Master Plan. Additional regulations that would reduce the demand of new development on water and wastewater facilities include compliance with the City's NPDES permits related to construction activities as administered by the San Francisco Bay Regional Water Quality Control Board and Article 4 of the Porter-Cologne Water Quality Act, compliance with the Combined Sewer Overflow Control Policy and TMDL standards as set forth by the Basin Plan. Therefore, the FEIR found that 2009 Housing Element would have a less-than-significant impact with respect to the need for the construction or expansion of water or wastewater treatment facilities and the potential to result in a determination by the treatment provider that it has inadequate capacity to serve the City's projected demand.

Stormwater Drainage Facilities. The FEIR found that the 2009 Housing Element *would have a less-than-significant impact with respect to the need to construct or expand stormwater drainage facilities.* The FEIR reported that some 2009 Housing Element policies could result in intensification of uses on undeveloped sites, which could increase impervious surfaces, potentially creating more runoff and need for

stormwater drainage facilities. However, other policies would offset this potential impact by discouraging demolition and encouraging the maintenance of the City's existing housing stock, discouraging the modification of housing for parking, and ensuring housing is sustainably supported by sewer system, which also functions as stormwater drainage systems in the City. These policies were found to either essentially maintain the status quo (resulting in no foreseeable changes to the amount of impervious surface) or reduce the 2009 Housing Element's effects on the potential need for the construction or expansion of stormwater drainage facilities by discouraging demolition and encouraging the preservation of existing housing. For this reason, and because potential impacts related to stormwater facilities would be offset by compliance with existing regulations, including the stormwater design requirement of the SFGBO and the Green Landscaping Ordinance, the 2009 Housing Element was found to have a less-than-significant impact with respect to the need to construct or expand stormwater drainage facilities.

Water Supply. The FEIR found that, while 2009 Housing Element policies would not directly result in the construction of residential units and would not directly result in an increased demand for water, in general, future population growth as predicted by ABAG would increase water demand. The 2009 Housing Element policies would be expected to reduce the overall demand for water due to the inclusion of policies related to density. The 2009 Housing Element promotes greater density in two ways - increased density for affordable housing projects and increased density as a strategy to be pursued through the community planning process. However, greater density was found to limit the effect of new development overall because more people could be housed in a given building, which could reduce the number of required water hookups. In addition, measures that encourage housing density could be partially achieved by the construction of multi-family housing, which uses less water than single-family housing (e.g. through reduced landscaping). Nevertheless, the 2009 Housing Element was found to promote density to a lesser extent than the baseline condition (1990 Residence Element, which generally did not limit increased density to particular areas or through community planning processes), and thus, the FEIR found that the 2009 Housing Element could potentially result in an incrementally increased demand for water.

However, the 2009 Housing Element also includes policies that could offset policies which could have an adverse impact on water supply by ensuring new housing is adequately supported by infrastructure, including water. Moreover, the FEIR noted that the 2009 Housing Element would recognize the need for considering adequate infrastructure for new housing, would ensure sustainable water systems, and "green" water conservation measures in housing to reduce water demand, and would not represent a shift in policy from baseline conditions. Moreover, SFPUC, Department of Building Inspections (DBI), Planning Department, and Department of the Environment would continue to implement the SFGBO and other programs that would serve to ensure that water supply is adequate to meet future demands. The FEIR also found that the 2009 Housing Element would not result in an increase in water demand beyond that assumed in the SFPUC's Water Supply Availability Study. Therefore, the FEIR found that the 2009 Housing Element would have a *less-than-significant impact with respect to new or expanded water supply resources or entitlements.*

Solid Waste Disposal Capacity. The FEIR found that the 2009 Housing Element would have a *less-than-significant impact with respect to landfill capacity.* The FEIR noted that the 2009 Housing Element could require additional collection trucks and personnel to provide services to new housing; could add further strain to space-constrained corporation yards and waste processing and recycling facilities; could require additional parking space and maintenance facilities for collection vehicles; and that additional tonnage generated by new housing would increase throughput at waste processing and recycling facilities which

could, at some point, require additional processing lines (at waste processing and recycling facilities). The FEIR also noted that multi-family housing is significantly more challenging with regard to successful separation of recyclables and compostables than it is at single-family residences and, as such, generally places greater demands on waste processing and recycling infrastructure.

The FEIR found that construction associated with new housing could potentially result in inadequate waste, recycling, or compost collection service or inadequate landfill capacity because increased density or changes in land use patterns could increase waste stream separation challenges due to the promotion of higher density housing and increased waste generation expected from increased population growth. However, as noted in the FEIR, the 2009 Housing Element also contains a policy promoting the preservation of existing housing that could reduce its effects on the potential need for inadequate landfill capacity. This because a reduction in demolition would reduce the amount of construction demolition debris associated with new construction. Overall, the 2009 Housing Element was found to promote density to a lesser extent than the baseline condition (1990 Residence Element), and was found to potentially result in an incrementally decreased generation of solid waste. Although the 2009 Housing Element would not directly or indirectly result in the construction of residential units, all new development would be required to comply with the existing regulations related to green building construction and recycling. The potential of impacts due to the increase in density (near transit, for affordable housing projects, and through the community planning process) proposed by the 2009 Housing Element was found to be offset by the Mandatory Recycling and Composting Ordinance. Therefore, the FEIR concluded that the 2009 Housing Element would have a less-than-significant impact with respect to landfill capacity.

Proposed Project

As noted above, the 2014 Housing Element would continue all of the 2009 Housing Element objectives and policies, and most of the implementation measures which direct growth to certain areas of the City, promote increased density standards, promote preservation of residential buildings, promote energy-efficient housing development, and promote locating housing in proximity to job cores, neighborhood services and along transit routes. The 2014 Housing Element does not propose any specific projects, or zoning changes, and zoning changes are not required under state law, because the City currently has available capacity to meet RHNA. Moreover, the 2014 Housing Element would not directly result in increases to population, as residential growth during the Planning Period would occur regardless of Housing Element policies. The 2014 Housing Element would instead continue to provide direction for how new residential development in the City should occur, with an emphasis on affordability. The FEIR did not attribute any difference in environmental impacts to affordable housing as compared to market-rate housing. Therefore, as concluded in the FEIR for the 2009 Housing Element, the implementation of those same policies through the 2014 Housing Element would likewise result in less-than-significant impacts with respect to utilities and service systems.

As noted throughout this Addendum, the five policies added to the 2014 Housing Element would not be expected to result in physical impacts that would adversely affect the environment. Added policies 5.5, 5.6, 6.3, and 6.4 would result in administrative changes to the City's programs that serve low-income, homeless, and displaced populations but would not be expected to result in any physical changes to the environment. Moreover, they were part of the 2004 Housing Element and were previously considered in the FEIR. Added Policy 2.6 would ensure that housing supply is not converted to de factor commercial use through short-term rentals. This policy would also not result in any environmental impacts, since it encourages the continuation of the status quo with respect to maintaining existing housing stock and use.

To the degree that these additional policies could lead to more affordable housing projects than would otherwise be constructed, there is no evidence that such projects would result in more severe impacts with respect to utilities and service systems than were identified in the FEIR. This is because those affordable housing projects would have similar operational characteristics as market rate housing and would be subject to the same regulations related to how utilities are managed. In terms of impacts related to future water demand, no major project (more than 500 units) without a confirmation of sufficient water supply by the SFPUC, pursuant to SB 610 (Water Code §§ 10910-10915).

The three new implementation programs also would not be expected to result in physical impacts that would adversely affect the environment. Implementation Program 19 supports Policy 2.6, which would reinforce the status quo related to existing housing. Implementation Program 38b implements a density bonus program that already exists under State law (Government Code Section 65915). Finally, Implementation Program 64 promotes affordable housing; as noted above affordable housing was already assumed as part of the FEIR and would not increase environmental impacts due to the similar operational characteristics as market-rate housing.

Based on the foregoing, the 2014 Housing Element would not change or alter any of the FEIR's findings with respect to impacts to utilities and service systems and would not require any new mitigation measures. Additionally, there are no changed circumstances or new information that would change the FEIR's impact findings with respect to utilities and service systems.

Public Services

2009 Housing Element

Fire Protection. The FEIR found that the implementation of the 2009 Housing Element *would result in less-than-significant impacts with respect to fire protection.* The FEIR reported that the 2009 Housing Element contains policies that could potentially result in the need for new or altered fire protection facilities by promoting increasing density and directing housing growth to certain areas of the City. However, directing growth to certain areas of the City (e.g., near transit, within a community plan, etc.), as opposed to scattered throughout the City, could also result in more efficient response times. The FEIR noted that the 2009 Housing Element also contains policies that could reduce its effects on the potential need for the construction or expansion of fire protection facilities by promoting the identification of suitable housing sites, promoting seismic upgrades, and promoting the maintenance of existing housing. Seismic upgrades and other activities that would maintain housing in a safe condition could reduce the number of emergency situations requiring San Francisco Fire Department (SFFD) response. Although the FEIR found that the 2009 Housing Element would not result in the construction of residential units, all new development would be required to comply with the existing state and local regulations, including the San Francisco Fire Code. As new construction occurs, SFFD would analyze and evaluate housing levels, occupant load, response times, and other operational objectives to ensure adequate fire protection. Based on the above, and that fact that no changes to service ratios are expected as a result of the 2009 Housing Element, the FEIR concluded that it would have a less-than-significant impact with respect to a need for new or altered fire protection facilities.

Police Protection. The FEIR found that the implementation of the 2009 Housing Element *would result in a less-than-significant impact with respect to police protection.* The FEIR reported that the 2009 Housing Element would increase density standards for affordable housing projects and increase density as a strategy to be pursued during community planning processes. Thus, the FEIR reported that the 2009 Housing Element could potentially result in the need for the construction or expansion of police protection facilities by

promoting increased density in certain areas of the City. However, as noted in the FEIR, the 2009 Housing Element contains policies that could reduce such impacts by promoting increased residential presence, infill development, and design that promotes community interaction, thereby potentially reducing blight and associated crime. Furthermore, while the 2009 Housing Element promotes increased density, it would not increase overall citywide population. Therefore, no changes to service ratios were expected as a result of the 2009 Housing Element. Therefore, the FEIR concluded that the 2009 Housing Element would have a less-than-significant impact with respect to the need for new or altered police protection facilities.

Schools. The San Francisco Unified School District (SFUSD) assigns schools based on a lottery system. This lottery system ensures that student enrollment is distributed to facilities that have sufficient capacity to adequately serve the educational needs of students. Therefore, directing growth to certain areas of the City would generally not affect the school system because students are not assigned to schools based on location. The 2009 Housing Element includes policies that promote family-sized housing units. Family housing could result in the need for new or altered school facilities by accommodating larger households, which could result in an increase in the number of families with school-aged children, thereby decreasing the excess capacity in the school system. Although, as reported in the FEIR, the 2009 Housing Element would not result in the construction of residential units, all new residential development is assessed a development fee to address the impacts of new development on school services. The payment of such fees would reduce any impacts of new development on school services, as provided in Section 65996 of the California Government Code. Given that SFUSD was under capacity at the time of the preparation of the FEIR, new development would be assessed a development fee paid towards school services, and the 2009 Housing Elements would not increase overall population growth projected by regional agencies, the FEIR concluded that the 2009 Housing Element *would have a less-than-significant impact with respect to the need for new or altered school facilities.*

Library Facilities. The FEIR determined that the 2009 Housing Element *would have a less-than-significant impact with respect to the need for new or altered library facilities.* Its policies could promote changes in density or the introduction of residential uses in previously industrial or commercial areas, which could result in a need for increased library service. However, as reported in the FEIR, the San Francisco Public Library system does not anticipate these facilities reaching capacity, though expanded demand could necessitate extended public service hours for branch libraries. The 2009 Housing Element contains a policy that could reduce such effects by considering the proximity of neighborhood services, including libraries, when developing housing. As reported in the FEIR, although the 2009 Housing Element would not result in the construction of residential units, all new development would be required to comply with the mitigation and developer fees. Therefore, the FEIR concluded that 2009 Housing Element would have a less-than-significant impact with respect to the need for new or altered library facilities.

Public Health Facilities. The FEIR concluded that the 2009 Housing Element *would have a less-than-significant impact with respect to the need for new or altered facilities.* For example, its policies could result in density changes or the introduction of residential uses in previously industrial or commercial areas, which could result in a need for different types and levels of public health service. The FEIR noted that the 2009 Housing Element contains a policy that could reduce such effects by considering the proximity of neighborhood services, including public health facilities, when developing housing. As reported in the FEIR, the 2009 Housing Element would not result in the construction of residential units, and policies that call for new housing with adequate services were found to reduce impacts to public health facilities. Furthermore, the proposed 2009 Housing Element would not increase overall population growth

projected by regional agencies. Therefore, the FEIR concluded that the 2009 Housing Element would have a less-than-significant impact with respect to the need for new or altered public health facilities.

Proposed Project

As noted above, the 2014 Housing Element would continue all of the 2009 Housing Element objectives and policies, and most of the implementation measures which direct growth to certain areas of the City, promote increased density standards, promote preservation of residential buildings, promote energy-efficient housing development, and promote locating housing in proximity to job cores, neighborhood services and along transit routes. The 2014 Housing Element does not propose any specific projects, or zoning changes, and zoning changes are not required under state law, because the City currently has available capacity to meet the RHNA. Moreover, the 2014 Housing Element policies would not directly result in increases to population, as residential growth during the Planning Period would occur regardless. The 2014 Housing Element would instead continue to provide direction for how new residential development in the City should occur, with an emphasis on affordability. The FEIR did not attribute any difference in environmental impacts to affordable housing as compared to market-rate housing. Therefore, as concluded in the FEIR for the 2009 Housing Element, the continuation of those same policies through the 2014 Housing Element would likewise result in less-than-significant impacts with respect to public services.

As noted throughout this Addendum, the five policies added to the 2014 Housing Element would not be expected to result in physical impacts that would adversely affect the environment. Added policies 5.5, 5.6, 6.3, and 6.4 would result in administrative changes to the City's programs that serve low-income, homeless, and displaced populations but would not be expected to result in any physical changes to the environment. Moreover, they were part of the 2004 Housing Element and were previously considered in the FEIR. Added Policy 2.6 would ensure that housing supply is not converted to de facto commercial use through short-term rentals. This policy would also not result in any environmental impacts, since it encourages the continuation of the status quo with respect to maintaining existing housing stock and use. To the degree that these additional policies could lead to more affordable housing projects than would otherwise be constructed, there is no evidence that such projects would result in more severe impacts with respect to public services than were identified in the FEIR. This is because those affordable housing projects would have the same or similar operational characteristics as market rate housing and would be subject to the same policies and regulations related to how public services are provided (i.e., development fees, etc.).

The three new implementation programs also would not be expected to result in physical impacts that would adversely affect the environment. Implementation Program 19 supports Policy 2.6, which would reinforce the status quo related to existing housing. Implementation Program 38b implements a density bonus program that already exists under State law (Government Code Section 65915). Finally, Implementation Program 64 promotes affordable housing; as noted above affordable housing was already assumed as part of the FEIR and would not increase environmental impacts due to the similar operational characteristics as market-rate housing.

Based on the foregoing, the 2014 Housing Element would not change or alter any of the FEIR's findings with respect to impacts to public services and would not require any new mitigation measures. Additionally, there are no changed circumstances or new information that would change the FEIR's impact findings with respect to public services.

Biological Resources

2009 Housing Element

The FEIR found that the implementation of the 2009 Housing Element *would not have a substantial adverse effect on any candidate, sensitive, or special-status species, riparian habitat or other sensitive natural communities, federally protected wetlands, or interfere with the movement of species.* In general, the 2009 Housing Element includes policies that direct growth primarily through community planning processes, but also includes policies that direct housing to commercial areas and sites near transit. As reported in the FEIR, directing new housing to certain areas of the City could increase the amount of new housing occurring in those areas, thereby potentially resulting in new development potentially requiring tree removal, construction on or near wetlands or sensitive habitats or riparian areas, interference with migration, take of special status species, application of pesticides and herbicides, construction of tall buildings with glass walls that could increase bird strikes and possibly interrupt a migration corridor, and conflict with provisions of an adopted habitat conservation plan. In addition, increases in density could be accomplished by promoting development to full height limits in the Downtown area, which the FEIR found could affect bird migration. On the other hand, increasing density could accommodate more of the City's fair share of the RHNA in fewer buildings, necessitating less new construction sites and less potential for disturbance or interference to biological resources. The FEIR noted that the 2009 Housing Element also contains policies that discourage demolition and encourage the maintenance of the City's existing housing stock, thereby reducing the amount of new housing required to meet the City's housing needs and subsequent biological resource-related impacts resulting from development at maximum allowable height and bulk limits.

The FEIR also found that the 2009 Housing *would not conflict with any local policies or ordinances protecting biological resources or conflict with the provisions of an adopted habitat conservation plan.* This is because it does not contain any policies that would directly or indirectly conflict with any policies protecting biological resources or any adopted habitat conservation plans. New residential development would be required to comply with existing regulations and plans, including the Open Space Element of the San Francisco General Plan, Chapter 8 of the San Francisco Environment Code, San Francisco's Green Building Ordinance, San Francisco's IPM Ordinance, San Francisco's Urban Forest Plan, and San Francisco's Urban Forestry Ordinance. The FEIR also found that development of opportunity sites throughout the City would not fundamentally conflict with any applicable habitat conservation plan (HCP) or natural community conservation plan (NCCP) because neither of these exists in the City. Furthermore, as reported in the FEIR, the 2009 Housing Element encourages higher density and infill development in already urbanized areas. Furthermore, it was found to not result in conflicts with plans and policies related to the protection of biological resources because it would not directly or indirectly result in population growth or new development. Based on the above, the FEIR concluded that the 2009 Housing Element would have no impact with respect to conflicts with local plans or ordinances protecting biological resources or with the provisions of an adopted habitat conservation plan.

Proposed Project

As noted above, the 2014 Housing Element would continue all of the 2009 Housing Element objectives and policies, and most of the implementation measures which direct growth to certain areas of the City, promote increased density standards, promote preservation of residential buildings, promote energy-efficient housing development, and promote locating housing in proximity to job cores, neighborhood services and along transit routes. The 2014 Housing Element does not propose any specific projects, or zoning changes, and zoning changes are not required under state law, because the City currently has

available capacity to meet the RHNA. Moreover, the 2014 Housing Element would not directly result in increases to population, as residential growth during the Planning Period would occur regardless of Housing Element policies. The 2014 Housing Element would instead continue to provide direction for how new residential development in the City should occur, with an emphasis on affordability. The FEIR did not attribute any difference in environmental impacts to affordable housing as compared to market-rate housing. Therefore, as concluded in the FEIR for the 2009 Housing Element, the implementation of those same policies through the 2014 Housing Element would likewise result in less-than-significant impacts with respect to biological resources.

As noted throughout this Addendum, the five policies added to the 2014 Housing Element would not be expected to result in physical impacts that would adversely affect the environment. Added policies 5.5, 5.6, 6.3, and 6.4 would result in administrative changes to the City's programs that serve low-income, homeless, and displaced populations but would not be expected to result in any physical changes to the environment. Moreover, they were part of the 2004 Housing Element and were previously considered in the FEIR. Added Policy 2.6 would ensure that housing supply is not converted to de facto commercial use through short-term rentals. This policy would also not result in any environmental impacts, since it encourages the continuation of the status quo with respect to maintaining existing housing stock and use. To the degree that these additional policies could lead to more affordable housing projects than would otherwise be constructed, there is no evidence that such projects would result in more severe impacts with respect to biological resources than were identified in the FEIR. This is because those affordable housing projects would not result a substantial physical change compared to the 2009 Housing Element and would also be subject to the same policies and regulations mentioned above that protect biological resources.

The three new implementation programs also would not be expected to result in physical impacts that would adversely affect the environment. Implementation Program 19 supports Policy 2.6, which would reinforce the status quo related to existing housing. Implementation Program 38b implements a density bonus program that already exists under State law (Government Code Section 65915). Finally, Implementation Program 64 promotes affordable housing; as noted above affordable housing was already assumed as part of the FEIR and would not increase environmental impacts due to the similar operational characteristics as market-rate housing.

Based on the foregoing, the 2014 Housing Element would not change or alter any of the FEIR's findings with respect to impacts to biological resources and would not require any new mitigation measures. Additionally, there are no changed circumstances or new information that would change the FEIR's impact findings with respect to biological resources.

Geology and Soils

2009 Housing Element

The FEIR found that the 2009 Housing Element *would have a less-than-significant impact with respect to an exposure of people to strong seismic ground shaking and seismic-related ground failure, including liquefaction, or landslides.* As reported in the FEIR, the 2009 Housing Element contains policies that could potentially result in the exposure of people to strong seismic ground shaking and seismic-related ground failure, including liquefaction, or landslides by increasing density in areas susceptible to these hazards, thereby exposing additional persons to these hazards. However, as noted in the FEIR, new residential construction would be developed in a seismically sound manner and would comply with building regulations for seismic safety that are enforced through the City's interdepartmental review process.

Moreover, the 2009 Housing Element has policies that were determined to reduce this impact and increase safety for residents by encouraging seismic upgrades to existing housing and, in general, discouraging demolition and improving the existing housing supply. This would reduce the amount of new housing required to meet the City's housing needs and subsequent seismic hazards impacts resulting from development to maximum allowable height and bulk limits, potentially increasing building height and mass. Furthermore, the effect of increasing the number of people exposed to hazards by promoting increased density is addressed during the permit review process, during which DBI would ensure that new buildings meet the standards for the protection of life and safety standards and all new development would be required to comply with these specifications. Therefore, the FEIR determined that implementation of the 2009 Housing Element would have a less-than-significant impact with respect to exposure of people to strong seismic ground shaking and seismic-related ground failure, including liquefaction, or landslides.

The FEIR also found that the 2009 Housing Element *would have a less-than-significant impact with respect to substantial soil erosion or the loss of topsoil*. Although some 2009 Housing Element policies were found to result in impacts related to erosion and the loss of topsoil by promoting housing construction on undeveloped sites, the 2009 Housing Element also contains policies that would reduce this impact by promoting the maintenance of and discouraging demolition of the existing housing stock, thereby avoiding the potential seismic impacts that could occur. As reported in the FEIR, the preservation of existing housing would reduce the pressure for new housing development that could result in increased soil erosion or loss of topsoil. Furthermore, potential impacts related to development on undeveloped sites would be offset by mandatory compliance with existing state and local regulations, such as the California Building Code.

The FEIR also found that the 2009 Housing Element *would have a less-than-significant impact with respect to the construction of housing on project sites that could be subject to on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse*. As discussed above, the 2009 Housing Element contains policies that could promote development to the maximum building envelope, potentially resulting in greater building heights by directing growth to certain areas of the City and promoting increased density standards. The 2009 Housing Element also contains policies that could reduce its effects on the potential for new development at maximum allowable height and bulk limits by promoting the maintenance of and discouraging demolition of the existing housing stock. The preservation of existing housing was found to reduce the pressure for new housing development that could be located on a geologic unit or soil that is unstable. Moreover, the FEIR found that potential impacts related to increased density would be offset by compliance with existing federal, state, and local regulations. Hence, the implementation of the 2009 Housing Element was found to have a less-than-significant impact with respect to the construction of housing units on project sites that could be subject to in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse.

The FEIR also found that the implementation of the 2009 Housing Element *would have a less-than-significant impact with respect to the construction of housing on project sites subject to expansive soil*, creating substantial risks to life or property. As reported in the FEIR, the 2009 Housing Element contains policies that could promote development to the maximum building envelope, potentially resulting in greater building heights by directing growth to certain areas of the City and promoting increased density standards. Construction associated with housing could potentially result in impacts related to expansive soil because increased density would result in heavier buildings which could increase the weight on soil beyond what it has previously experienced. However, as noted in the FEIR, other 2009 Housing Element policies would offset this effect by promoting the maintenance of and discouraging demolition of the

existing housing stock, thereby avoiding impacts related to expansive soil. In addition, as discussed in the FEIR, potential impacts related to increased density would be offset by compliance with existing federal, state, and local regulations. DBI, in its permit review process, would ensure that buildings meet specifications for the protection of life and safety. Therefore, the FEIR concluded that the 2009 Housing Element would have a less-than-significant impact with respect to the construction of housing on project sites subject to expansive soil, creating substantial risks to life or property.

Lastly, the FEIR also found that 2009 Housing Element *would have a less-than-significant impact with respect to substantial change to the topography or any unique geologic or physical features* on project sites. As discussed above, the 2009 Housing Element contains policies that could result in impacts related to erosion and the loss of topsoil by promoting housing construction on undeveloped sites. However, as reported in the FEIR, the 2009 Housing Element also contains policies that could reduce its effects on the potential for new development at maximum allowable height and bulk limits by promoting the maintenance of and discouraging demolition of the existing housing stock, thereby avoiding the potential seismic impacts that could be generated. Moreover, the FEIR found that potential impacts related to density would be offset through the Planning Department's review of all grading and building permit applications for new construction or additions to existing buildings and compliance with the Building Code regulations related to grading and excavation activities and project design plans that would be subject to review by the City's Planning Department for consistency with policies related to land alteration. Therefore, the FEIR concluded that the 2009 Housing Element would have a less-than-significant impact with respect to substantial change to the topography or any unique geologic or physical features on project sites.

Proposed Project

As noted above, the 2014 Housing Element would continue all of the 2009 Housing Element objectives and policies, and most of the implementation measures which direct growth to certain areas of the City, promote increased density standards, promote preservation of residential buildings, promote energy-efficient housing development, and promote locating housing in proximity to job cores, neighborhood services and along transit routes. The 2014 Housing Element does not propose any specific projects, or zoning changes, and zoning changes are not required under state law, because the City currently has available capacity to meet the RHNA. Moreover, the 2014 Housing Element would not directly result in increases to population, as residential growth during the Planning Period would occur regardless of Housing Element policies. The 2014 Housing Element would instead continue to provide direction for how new residential development in the City should occur, with an emphasis on affordability. The FEIR did not attribute any difference in environmental impacts to affordable housing as compared to market-rate housing. Therefore, as concluded in the FEIR for the 2009 Housing Element, the implementation of those same policies through the 2014 Housing Element would likewise result in less-than-significant impacts with respect to geology and soils.

As noted throughout this Addendum, the five policies added to the 2014 Housing Element would not be expected to result in physical impacts that would adversely affect the environment. Added policies 5.5, 5.6, 6.3, and 6.4 would result in administrative changes to the City's programs that serve low-income, homeless, and displaced populations but would not be expected to result in any physical changes to the environment. Moreover, they were part of the 2004 Housing Element and were previously considered in the FEIR. Added Policy 2.6 would ensure that housing supply is not converted to de factor commercial use through short-term rentals. This policy would also not result in any environmental impacts, since it encourages the continuation of the status quo with respect to maintaining existing housing stock and use. To the degree that these additional policies could lead to more affordable housing projects than would

otherwise be constructed, there is no evidence that such projects would result in more severe impacts with respect to geology and soils than were identified in the FEIR. This is because those affordable housing projects would have similar physical characteristics as market rate housing and would also be subject to the same policies and regulations mentioned above that ensure safe building construction throughout the City.

The three new implementation programs also would not be expected to result in physical impacts that would adversely affect the environment. Implementation Program 19 supports Policy 2.6, which would reinforce the status quo related to existing housing. Implementation Program 38b implements a density bonus program that already exists under State law (Government Code Section 65915). Finally, Implementation Program 64 promotes affordable housing; as noted above affordable housing was already assumed as part of the FEIR and would not increase environmental impacts due to the similar operational characteristics as market-rate housing.

Based on the foregoing, the 2014 Housing Element would not change or alter any of the FEIR's findings with respect to impacts to geology and soils and would not require any new mitigation measures. Additionally, there are no changed circumstances or new information that would change the FEIR's impact findings with respect to geology and soils.

Hydrology and Water Quality

2009 Housing Element

The FEIR found that the 2009 Housing Element *would have a less-than-significant impact with respect to violating any water quality standards or waste discharge requirements*. As reported in the FEIR, the 2009 Housing Element contains policies that could result in increases to density, which could result in creation of new impervious surfaces resulting in an increase in polluted runoff from project sites as well as violation of water quality standards or waste discharge requirements. However, the FEIR reported that the 2009 Housing Element also contains policies that discourage demolition and encourage the maintenance of the City's existing housing stock and promote green development, thereby reducing the amount of new housing required to meet the City's housing needs – this was found to potentially further reduce its effects on the potential for new impervious surfaces resulting in an increase in polluted runoff from project sites. Furthermore, as reported in the FEIR, the 2009 Housing Element contains policies advocating for green development, which could reduce the effects of new construction on water quality standards and discharge requirements. In addition, future construction would be subject to existing regulations, including the SFGBO, the City of San Francisco Construction Site Water Pollution Prevention Program (SWPPP), the San Francisco Stormwater Management Plan, and others. Based on this, the FEIR concluded that the 2009 Housing Element would have a less-than-significant impact with respect to violation of any water quality standards or waste discharge requirements.

The FEIR also found that the implementation of the 2009 Housing Element *would result in a less-than-significant impact with respect to substantially depleting groundwater supplies or interfering substantially with groundwater recharge*. Although construction of new housing in certain areas was found to have the potential to result in the need for dewatering during construction or an increase in the amount of impervious surface interfering with groundwater recharge, the 2009 Housing Element contains policies that were found to potentially reduce this impact by discouraging the creation of large impervious surfaces. Additionally, new construction would be required to comply with SFGBO requirements for stormwater treatment and infiltration and well as other applicable regulations mentioned above, potentially increasing groundwater recharge. Therefore, the FEIR concluded that the 2009 Housing

Element would have a less-than-significant impact with respect to substantially depleting groundwater supplies or interfering substantially with groundwater recharge.

The FEIR also found that the 2009 Housing Element *would have a less-than-significant impact with respect to alteration of existing drainage on project sites that could lead to erosion or siltation or increase the rate of surface runoff in a manner that could result in flooding.* The 2009 Housing Element includes policies that promote new residential construction to meet the RHNA and site grading required to accommodate such construction could alter drainage patterns on individual project sites. However, as reported in the FEIR, the 2009 Housing Element contains numerous policies that promote the preservation of existing housing units, potentially resulting in few construction activities that could alter drainage patterns on project sites. The 2009 Housing Element also contains policies discouraging the creation of large impervious surfaces, encouraging the use of non-point source control devices to reduce and filter runoff from project sites, and promote infiltration of stormwater on the project site, thereby reducing runoff. The FEIR reported that new development would be required to comply with existing regulations that would require erosion control measures and stormwater treatment requirements pursuant to the SFGBO. Based on this, the FEIR concluded this impact to be less than significant.

The FEIR also determined that the 2009 Housing Element *would have a less-than-significant impact with respect to an increase in the rate of surface runoff in a manner that could exceed the capacity of stormwater drainage systems or result in substantial sources of polluted runoff.* As reported in the FEIR, the 2009 Housing Element contains policies that promote new housing construction to meet the RHNA, which could result in the increase of impervious surfaces on projects that could increase runoff, potentially exceeding the capacity of stormwater drainage systems. However, it also contains policies that could reduce potential effects related to stormwater runoff by discouraging demolition, potentially resulting in less construction of new impervious surfaces on project sites. Any future development would be subject to existing regulations regarding stormwater runoff, including SFGBO and SWPPP requirements. Based on this, the FEIR concluded this impact to be less than significant.

The FEIR also found that implementation of the 2009 Housing Element *would have a less-than-significant impact with respect to the placement of housing within a flood hazard zone.* As reported in the FEIR, the placement of housing in certain areas throughout the City, including Candlestick, Treasure Island, Mission Bay, and Hunters Point Shipyard, would result in the exposure of an increased number of people to flood hazards. Flood risk assessment and some flood protection projects are conducted by federal agencies including FEMA and ACE. The flood management agencies and cities implement the NFIP under the jurisdiction of FEMA and its Flood Insurance Administration. At the time of the preparation of the FEIR, San Francisco did not participate in the NFIP, although interim FIRMs were being prepared for the City, which identify areas that are subject to inundation during a flood having a 1 percent chance of occurrence in a given year (also known as a "base flood" or "100-year flood"). FEMA has tentatively identified special flood hazard area (SFHAs) along the City's shoreline in and along the San Francisco Bay consisting of Zone A (in areas subject to inundation by tidal surge) and Zone V (areas of coastal flooding subject to wave hazards). 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 FEIR noted that, once the Board of Supervisors adopts the Floodplain Management Ordinance, the Department of Public Works will publish flood maps for the City, and applicable City departments and agencies may begin

implementation for new construction and substantial improvements in areas shown on the Interim Floodplain Map.

The FEIR reported that the 2009 Housing Element contain policies that encourage the construction of new housing, some of which could be constructed within a 100-year flood hazard area as mapped on a FEMA Flood Hazard Boundary or FIRM or other authoritative flood hazard delineation map. The placement of housing in these areas could result in the exposure of an increased number of people to flood hazards. However, as reported in the FEIR, new construction within flood prone areas identified by the SFPUC would be required to undergo a review process to avoid flooding problems caused by the relative elevation of a structure to the hydraulic grade line in the sewers. Moreover, future development would be subject to its own environmental review to consider elements such as placing housing in areas susceptible to floods. This process involves coordination between Planning Department, SFPUC, DBI, OCII, and other agencies (such as Port of San Francisco) as needed. Future residential development would be subject to review for location in a flood zone, which could include the following actions: a detailed computerized flood hazard analysis in accordance with current standards set forth by FEMA, requirements for inclusion of appropriate flood plain management measures incorporated into the location and design of new buildings that are within a flood zone (such as pump stations, raised entryways, and/or special sidewalk construction and the provision of deep gutters), and any other appropriate mitigation measures made by a qualified civil engineer or hydrologist. Based on this, the FEIR concluded that this impact would be less than significant.

The FEIR concluded that the 2009 Housing Element *would have a less-than-significant impact with respect to placement of housing or significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a dam or levee.* As discussed in the FEIR, the 2009 Housing Element contain policies that encourage the construction of new housing, some of which could be located near an existing aboveground reservoir, resulting in the exposure of an increased number of people to flood hazards. However, it also contain policies that could reduce potential effects related to flooding due to dam or levee failure by discouraging demolition, potentially reducing the amount of new construction required to meet the City's housing demand, which could reduce housing construction near aboveground reservoirs and tanks. Moreover, as reported in the FEIR, new housing construction would be subject to project-level environmental review that considers existing site conditions and the potential of the project to expose people to flooding from dam or levee failure. Through this process, this FEIR concluded that the impact associated with the 2009 Housing Element would be less than significant.

Lastly, the FEIR found that the 2009 Housing Element *would have a less-than-significant impact with respect to the construction of housing in areas that are potentially subject to risk of tsunami, seiche, or mudflows.* As reported in the FEIR, the 2009 Housing Element promotes density for affordable housing projects and promotes increased density as a strategy to be pursued through the community planning process. Promoting increased density could place more people near open water, near bodies of water, or near steep slopes in the City and could result in significant risk of loss, injury or death involving inundation by seiche, tsunami, or mudflow. However, as discussed in the FEIR, the 2009 Housing Element also contain policies that could reduce potential effects related to flooding due to dam or levee failure by discouraging demolition, potentially reducing the amount of new construction required to meet the City's housing demand. Therefore, fewer housing units could be constructed with the potential to be inundated. Further, the FEIR reported that new development would be required to comply with existing regulations, including DBI approval of the final plans for any specific development. Hence, this impact was determined to be less than significant.

Proposed Project

As noted above, the 2014 Housing Element would continue all of the 2009 Housing Element objectives and policies, and most of the implementation measures which direct growth to certain areas of the City, promote increased density standards, promote preservation of residential buildings, promote energy-efficient housing development, and promote locating housing in proximity to job cores, neighborhood services and along transit routes. The 2014 Housing Element does not propose any specific projects, or zoning changes, and zoning changes are not required under state law, because the City currently has available capacity to meet the RHNA. Moreover, the 2014 Housing Element would not directly result in increases to population, as residential growth during the Planning Period would occur regardless of Housing Element policies. The 2014 Housing Element would instead continue to provide direction for how new residential development in the City should occur, with an emphasis on affordability. The FEIR did not attribute any difference in environmental impacts to affordable housing as compared to market-rate housing. Therefore, as concluded in the FEIR for the 2009 Housing Element, the implementation of those same policies through the 2014 Housing Element would likewise result in less-than-significant impacts with respect to hydrology and water quality.

As noted throughout this Addendum, the five policies added to the 2014 Housing Element would not be expected to result in physical impacts that would adversely affect the environment. Added policies 5.5, 5.6, 6.3, and 6.4 would result in administrative changes to the City's programs that serve low-income, homeless, and displaced populations but would not be expected to result in any physical changes to the environment. Moreover, they were part of the 2004 Housing Element and were previously considered in the FEIR. Added Policy 2.6 would ensure that housing supply is not converted to de facto commercial use through short-term rentals. This policy would also not result in any environmental impacts, since it encourages the continuation of the status quo with respect to maintaining existing housing stock and use. To the degree that these additional policies could lead to more affordable housing projects than would otherwise be constructed, there is no evidence that such projects would result in more severe impacts with respect to hydrology and water quality than were identified in the FEIR. This is because those affordable housing projects would have similar operational characteristics as market rate housing and would be subject to the same policies and regulations mentioned above that ensure that water quality- and flooding-related impacts are minimized.

The three new implementation programs also would not be expected to result in physical impacts that would adversely affect the environment. Implementation Program 19 supports Policy 2.6, which would reinforce the status quo related to existing housing. Implementation Program 38b implements a density bonus program that already exists under State law (Government Code Section 65915). Finally, Implementation Program 64 promotes affordable housing; as noted above affordable housing was already assumed as part of the FEIR and would not increase environmental impacts due to the similar operational characteristics as market-rate housing and would be subject to the same regulations that ensure that water quality- and flooding-related impacts are minimized.

Based on the foregoing, the 2014 Housing Element would not change or alter any of the FEIR's findings with respect to impacts to hydrology and water quality and would not require any new mitigation measures. Additionally, there are no changed circumstances or new information that would change the FEIR's impact findings with respect to hydrology and water quality.

Hazards and Hazardous Materials

2009 Housing Element

The FEIR determined that the 2009 Housing Element *would have a less-than-significant impact with respect to the routine transport, use, or disposal of hazardous materials*. As reported in the FEIR, transport and storage of the types of potentially hazardous materials associated with residential uses (solvents, paint, batteries, fertilizers, and petroleum products) would not pose a significant hazard to the public or the environment because there are established programs that regulate their disposal. Moreover, the San Francisco Department of the Environment conducts education and outreach for proper disposal of household toxics such as through the Toxics Reduction Program. Hazardous materials transport may also be associated with new construction due to the required transport of certain building materials to construction sites or redevelopment of sites containing hazardous materials. However, as reported in the FEIR, the implementation of the 2009 Housing Element was not assumed to directly result in construction activities. While increases in density promoted by the 2009 Housing Element may result in a localized increase in housing construction, thereby increasing the risk associated with the transport, use, and disposal of hazardous materials encountered during construction, the 2009 Housing Element contains policies that promote the preservation of existing housing units, reducing the need for replacement housing, potentially reducing such risks. Thus, the FEIR concluded that this impact would be less than significant.

The FEIR also determined that implementation of the 2009 Housing Element *would have a less-than-significant impact with respect to upset and accident conditions involving the release of hazardous materials into the environment*. As reported in the FEIR, new housing could result in impacts related to upset and accident conditions because future residential units could be located within potentially hazardous areas, the construction or operation of which could involve the release of hazardous materials into the environment (such materials include lead, asbestos, and other contaminants that may be present in soil and groundwater). Additional residential uses could also increase the amount of household hazardous materials stored and used within the City and could therefore increase the risk of onsite upset and accident conditions. However, as reported in the FEIR, the 2009 Housing Element would not result in the construction of residential units, and all new development would be required to comply with all applicable federal, state, and local regulations concerning hazardous materials. These include Article 22A of the Health Code, Cal/OSHA regulations, SFDPH UST removal and site cleanup requirements, Hazard Mitigation Plan, and others. Based on these, the FEIR concluded that the 2009 Housing Element would have a less-than-significant impact with respect to upset and accident conditions involving the release of hazardous materials into the environment.

The FEIR also concluded that the 2009 Housing Element *would have a less-than-significant impact with respect to hazardous emissions or the handling of hazardous materials within one-quarter mile from an existing or proposed school*. This determination was based on the fact that it does not contain any policies that would directly contribute to the emission of hazardous substances near schools and because all new development would be required to comply with all applicable federal, state, and local regulations.

The FEIR also determined that the 2009 Housing Element *would have a less-than-significant impact with respect to directing housing to hazardous materials sites as compiled pursuant to Government Code Section 65962.5*. Although the FEIR noted that future housing could be sited in formerly commercial or industrial areas and on Brownfield or infill development sites, restrictions are already imposed on such sites, and any such development would be subject to remediation and cleanup under DTSC, SFRWQCB and other applicable federal, state and local regulations. This would result in less-than-significant impacts following required remediation.

The FEIR also concluded that the 2009 Housing Element *would have a less-than-significant impact with respect to interference with an adopted emergency response plan or emergency evacuation plan*. As reported, the 2009 Housing Element includes policies that could direct growth to certain areas of the City and promote density in specific areas, which could potentially result in localized increased congestion in high density areas of the City and along commercial corridors, the downtown and extended downtown, which could result in interference with emergency access. However, the 2009 Housing Element would not directly result in the construction of residential units and all new development would be required to comply with all applicable federal, state, and local regulations. Therefore, the FEIR concluded that this impact would be less than significant.

Lastly, the FEIR concluded that the 2009 Housing Element *would have a less-than-significant impact with respect to the exposure of people or structures to a significant risk of loss, injury, or death involving fires*, since future construction would be subject to the provisions of the San Francisco Building Code and Fire Code and would be subject to SFFD and DBI review.

Proposed Project

The 2014 Housing Element would continue all of the 2009 Housing Element objectives and policies, and most of the implementation measures which direct growth to certain areas of the City, promote increased density standards, promote preservation of residential buildings, promote energy-efficient housing development, and promote locating housing in proximity to job cores, neighborhood services and along transit routes. The 2014 Housing Element does not propose any specific projects, or zoning changes, and zoning changes are not required under state law, because the City currently has available capacity to meet the RHNA. Moreover, the 2014 Housing Element would not directly result in increases to population, as residential growth during the Planning Period would occur regardless of Housing Element policies. The 2014 Housing Element would instead continue to provide direction for how new residential development in the City should occur, with an emphasis on affordability. The FEIR did not attribute any difference in environmental impacts to affordable housing as compared to market-rate housing. Therefore, as concluded in the FEIR for the 2009 Housing Element, the continuation of those same policies through the 2014 Housing Element would likewise result in less-than-significant impacts with respect to hazards and hazardous materials.

As noted throughout this Addendum, the five policies added to the 2014 Housing Element would not be expected to result in physical impacts that would adversely affect the environment. Added policies 5.5, 5.6, 6.3, and 6.4 would result in administrative changes to the City's programs that serve low-income, homeless, and displaced populations but would not be expected to result in any physical changes to the environment. Moreover, they were part of the 2004 Housing Element and were previously considered in the FEIR. Added Policy 2.6 would ensure that housing supply is not converted to de facto commercial use through short-term rentals. This policy would also not result in any environmental impacts, since it encourages the continuation of the status quo with respect to maintaining existing housing stock and use. To the degree that these additional policies could lead to more affordable housing projects than would otherwise be constructed, there is no evidence that such projects would result in more severe impacts with respect to hazards and hazardous materials than were identified in the FEIR. This is because those affordable housing projects would be subject to the same regulations concerning hazards and hazardous materials as market-rate housing.

The three new implementation programs also would not be expected to result in physical impacts that would adversely affect the environment. Implementation Program 19 supports Policy 2.6, which would reinforce the status quo related to existing housing. Implementation Program 38b implements a density

bonus program that already exists under State law (Government Code Section 65915). Finally, Implementation Program 64 promotes affordable housing; as noted above affordable housing was already assumed as part of the FEIR and would not increase environmental impacts due to the similar operational characteristics as market-rate housing and would be subject to the same regulations concerning hazards and hazardous materials as market-rate housing.

Based on the foregoing, the 2014 Housing Element would not change or alter any of the FEIR's findings with respect to impacts to hazards and hazardous materials and would not require any new mitigation measures. Additionally, there are no changed circumstances or new information that would change the FEIR's impact findings with respect to hazards and hazardous materials.

Mineral and Energy Resources

2009 Housing Element

The FEIR found that the implementation of the 2009 Housing Element *would result in a less-than-significant impact related to the less of availability of a known mineral resource or the loss of availability of a locally important mineral resource recovery site*. This is because San Francisco City is not a designated area of significant mineral deposits and no area within the City is designated as a locally-important mineral resource recovery site.

The FEIR also found that the implementation of the 2009 Housing Element *would have a less-than-significant impact with respect to the use of large amounts of fuel, water, or energy*. The 2009 Housing Element contains policies that could reduce the amount of energy used by residential uses by promoting increased density, by directing growth to certain areas of the City, and by encouraging or requiring energy efficient features in housing. Increased density standards could result in more units within a given building envelope, which could be partially achieved by the construction of multi-family housing, which uses less fuel, water, and energy than single-family housing. The FEIR also found that directing new housing to certain areas of the City could reduce the City's overall vehicle miles traveled and subsequent fuel use by placing residents closer to jobs and transit. Moreover, the 2009 Housing Element also has policies that discourage demolition and encourage the maintenance of the City's existing housing stock and use, which could reduce the amount of new housing required to meet the City's housing needs and subsequently, fuel-, water-, and energy needs associated with demolition and new construction. Thus overall, the FEIR found that the 2009 Housing Element would actually reduce the need to fuel, water, and energy and this impact was found to be less than significant.

Proposed Project

The City is not a designated area of significant mineral deposits and no area within the City is designated as a locally-important mineral resource recovery site. For this reason, the 2014 Housing Element would result in no impact related to the loss of availability of a known mineral resource or the loss of availability of a locally important mineral resource recovery site.

The 2014 Housing Element would continue all of the policies in the 2009 Housing Element. As noted throughout this Addendum, the five policies and three new implementation programs that were added to the 2014 Housing Element would not be expected to result in physical impacts that would adversely affect the environment. All but one of these policies would result in administrative changes to the City's program that serve the low-income, homeless, and displaced populations but would not be expected to result in any discernable changes to the City's built environment. Added Policy 2.6, which seeks to "discourage conversion of housing supply to de facto commercial use through short-term rentals," would

address the housing tenure and ownership structure to protect the permanent housing stock from de facto conversion to short-term rentals. This policy would also not be expected to result in any physical implications on the environment. Moreover, Policies 5.5, 5.6, 6.3, and 6.4 were part of the 2004 Housing Element and were previously considered in the FEIR.

Based on the foregoing, the 2014 Housing Element would not change or alter any of the FEIR's findings with respect to mineral and energy resources impacts and would not require any new mitigation measures. Additionally, there are no changed circumstances or new information that would change the FEIR's mineral and energy resources impact findings.

Agricultural and Forest Resources

2009 Housing Element

The FEIR found that the 2009 Housing Element *would not conflict with existing zoning for agricultural use*. The FEIR found that implementation of the 2009 Housing Element would not include any changes to the City's zoning or height and bulk districts and, as such, the 2009 Housing Element would not conflict with existing zoning for urban agricultural uses. Therefore, the FEIR concluded that the 2009 Housing Element would have a less-than-significant impact with respect to conflict with existing zoning for agricultural use.

Proposed Project

The 2014 Housing Element would carry forward most of the policies and implementation programs included in the 2009 Housing Element and thus would not result in any physical changes that would alter the impact conclusions of the FEIR. The five additional policies that were added to the 2014 Housing Element would not be expected to result in physical impacts that would adversely affect the environment, would be administrative in nature, and would not be expected to change the conclusions reached in the FEIR. Moreover, Policies 5.5, 5.6, 6.3, and 6.4 were part of the 2004 Housing Element and were previously considered in the FEIR.

Based on the foregoing, the 2014 Housing Element would not change or alter any of the FEIR's findings with respect to impacts concerning agricultural and forest resources and would not require any new mitigation measures. Additionally, there are no changed circumstances or new information that would change the FEIR's impact findings concerning agricultural and forest resources.

MITIGATION MEASURES

The FEIR identified the mitigation measure below to mitigate the potentially significant impact related to interior and exterior noise. This measure was included as part of the 2009 Housing Element, as adopted, as Implementation Measures 17 and 18, and are continued as Implementation Measures in the 2014 Housing Element.

Mitigation Measure M-NO-1: Interior and Exterior Noise

For new residential development located along streets with noise levels above 75 dBA L_{dn} , as shown in Figure V.G-3 of the 2009 Housing Element, the Planning Department shall require the following:

1. The Planning Department shall require the preparation of an analysis that includes, at a minimum, a site survey to identify potential noise-generating uses within two blocks of the project site, and including at least one 24-hour noise measurement (with maximum noise level readings taken at least every 15 minutes), prior to completion of the environmental review. The

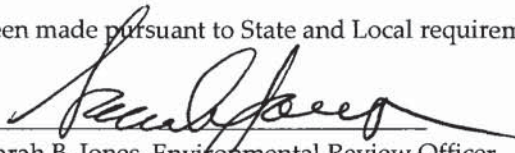
analysis shall demonstrate with reasonable certainty that Title 24 standards, where applicable, can be met, and that there are no particular circumstances about the proposed project site that appear to warrant heightened concern about noise levels in the vicinity. Should such concerns be present, the Department may require the completion of a detailed noise assessment by person(s) qualified in acoustical analysis and/or engineering prior to the first project approval action, in order to demonstrate that acceptable interior noise levels consistent with those in the Title 24 standards can be attained; and

2. To minimize effects on development in noisy areas, for new residential uses, the Planning Department shall, through its building permit review process, in conjunction with noise analysis required above, require that open space required under the Planning Code for such uses be protected, to the maximum feasible extent, from existing ambient noise levels that could prove annoying or disruptive to users of the open space. Implementation of this measure could involve, among other things, site design that uses the building itself to shield on-site open space from the greatest noise sources, construction of noise barriers between noise sources and open space, and appropriate use of both common and private open space in multi-family dwellings, and implementation would also be undertaken consistent with other principles of urban design.

CONCLUSION

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

DATE January 22, 2015


Sarah B. Jones, Environmental Review Officer
for John Rahaim, Director of Planning

APPENDIX – Updated and Deleted 2014 Housing Element Implementation Programs
(Compared to 2009 Housing Element)

TABLE A-1
Updated 2009 Housing Element Implementation Programs to
Continue in the 2014 Housing Element

Updated 2014 Housing Element Implementation Programs	Physical Implications of Implementation Programs
<p>Implementation Program 15: Planning continues to consult San Francisco Department of Public Health (SFDPH) on the Sustainable Communities Index for large planning processes that include large changes in infrastructure. Recent examples include the Western SoMa Community Plan and Health Services Master Plan.</p>	<p>This would continue an existing and ongoing consultation process between Planning Department and SFDPH that is administrative in nature and would not be expected to result in physical changes on the environment.</p>
<p>Implementation Program 32: Mayor’s Office of Housing (MOH) shall continue to implement the Small Site Acquisition and Rehabilitation Program which formally launched in July 2014 using inclusionary in-lieu fees and other public funds, to enable non-profits to acquire existing rental properties under 25 units for long-term affordability. The City will explore additional funding sources to expand the program to scale, as well as other methods of support, such as low-interest rate financing and in-kind technical assistance for small site acquisition and property management.</p>	<p>This would continue an existing and ongoing program lead by MOH that is administrative in nature and would not be expected to result in physical changes on the environment.</p>
<p>Implementation Program 33: MOH shall continue funding the acquisition and rehabilitation of landmark and historic buildings for use as affordable housing.</p>	<p>This would continue an existing and ongoing program lead by MOH with support by OCII that is administrative in nature (with a focus on funding) and would not be expected to result in physical changes on the environment.</p>
<p>Implementation Program 36: Planning should study the relationship between unit sizes and household size and types, including evaluation of units built as a result unit mix requirements in recently adopted community plans. This study should also evaluate older housing stock. Outcomes shall inform future policies and regulations related to minimum unit and</p>	<p>This would continue an existing implementation program, which is administrative in nature and would not be expected to result in physical changes on the environment.</p>

<p>bedroom sizes for both affordable housing and market-rate housing to accommodate larger households and/or families in San Francisco.</p>	
<p>Implementation Program 39: Planning has developed a legislative ordinance that will enable persons with disabilities who require reasonable accommodation as exceptions to the City’s Planning Code to bypass the currently required variance process, and to access a streamlined procedure permitting special structures or appurtenances such as access ramps of lifts and other non-physical accommodations and will be implemented in Winter of 2015.</p>	<p>This ordinance was heard at the Planning Commission in November 2014 and is awaiting adoption by the Board of Supervisors. This ordinance was a subject of a separate environmental review process (Planning Department Case No. 2014.0156E). The finalized CEQA exemption for this legislation documents why there is no potential for a significant impact on the environment.</p>
<p>Implementation Program 40: Planning will amend the San Francisco Planning Code to identify the appropriate districts, development standards, and management practices for as of right emergency shelters, per Government code section 65583(a), which requires the City to identify at least one zoning district where emergency shelters are allowed as of right. Emergency shelters will only be subject to the same development and management standards that apply to other uses within the identified zone. The City will amend and aim to locate zoning for by-right shelters close to neighborhood amenities and support services, which are generally found in the City’s Commercial (C) and Neighborhood Commercial (NC) districts, and which, per Appendix D-3, include a significant amount of housing opportunity sites.</p>	<p>This Planning Code revision has been completed. The project was determined to be “not a project” for the purposes of CEQA. Hence, it was determined to not result in physical changes on the environment.</p>
<p>Implementation Program 42: MOH shall encourage economic integration by locating new affordable and assisted housing opportunities outside concentrated low-income areas wherever possible, and by encouraging mixed-income development such as for-profit/non-profit partnerships. MOH shall regularly provide maps and statistics to the Planning Commission on the</p>	<p>This is part of the MOH Annual Report that is presented to Planning Commission on an annual basis (under existing conditions) and would not be expected to result in physical changes on the environment.</p>

<p>distribution of projects. This information shall be included in the annual Housing Inventory.</p>	
<p>Implementation Program 43: Planning and MOH shall continue to implement and update the Citywide Inclusionary Housing Program, which promotes the inclusion of permanently affordable units in housing developments of 10 or more units. The City shall evaluate the effectiveness of this program including: on-site, off-site, in-lieu fees, and land dedication options, and develop modifications to enhance the delivery of affordable housing units and mixed-income development in San Francisco neighborhoods through this program.</p>	<p>This would continue an existing and ongoing program that is administrative in nature and would not be expected to result in physical changes on the environment.</p>
<p>Implementation Program 45: The Mayor's Office on Housing shall work with San Francisco Housing Authority (SFHA), Human Services Agency (HSA), DPH, and nonprofit and private housing providers to develop a website providing information on affordable housing opportunities within the City, including BMRs, providing specific information about the availability of units and related registration processes, and applications.</p>	<p>The website discussed in this Implementation Program has been completed (http://sf-moh.org/index.aspx?page=130) and would not be expected to result in physical changes on the environment</p>
<p>Implementation Program 49: The City should continue to evaluate the effectiveness of existing programs to discourage displacement and to provide evicted tenants with sufficient relocation accommodations. Relocation services including counseling, locating replacement housing, and moving expenses should be provided to match the needs of displaced tenants. The City and the Board of Supervisors should continue to pursue necessary legislative modifications at local and State levels to minimize the adverse effects of evictions on tenants.</p>	<p>This would continue an existing and ongoing evaluation of the effectiveness of existing programs related to discouraging displacement and provisions of relocation accommodations. This program is administrative in nature and would not be expected to result in physical changes on the environment.</p>
<p>Implementation Program 54: The Department of Public Health, the Human</p>	<p>This would continue an existing and ongoing program that is administrative in nature and would not be expected</p>

<p>Services Agency; the Mayor’s Office of Community Development; the Department on the Status of Women; the Department of Children, Youth and Their Families; the Mayor’s Office of Housing continue to implement the 10 year plan to end the “Continuum of Care Five-Year Strategic Plan of San Francisco.” The City has also created a new Mayoral office, the Housing, Opportunity, Partnerships and Engagement (HOPE), which find ways to improve outcomes for individuals in all forms of city sponsored housing, including shelters, supportive, public and affordable housing.</p>	<p>to result in physical changes on the environment.</p>
<p>Implementation Program 55: The San Francisco Local Homeless Coordinating Board (LHCB) will continue to work with the Mayor’s Office of Housing, the Human Service Agency and the Department of Public Health to maintain and expand housing solutions to homelessness by focusing on new housing, and coordinated assessment to place the longest term homeless people in service enriched housing. The “10 Year Plan to End Chronic Homelessness” opened 3,000 new units.</p>	<p>This would continue an existing and ongoing program lead by LHCB that is administrative in nature and would not be expected to result in physical changes on the environment.</p>
<p>Implementation Program 58: The Planning Department will ensure that transitional and supportive housing is a residential use through code and/or policy changes.</p>	<p>This Planning Code revision has been completed and this implementation measure would not be expected to result in physical changes on the environment.</p>
<p>Implementation Program 60: The Office of Community Investment and Infrastructure (“OCII”), as the successor to the San Francisco Redevelopment Agency, will contribute to the development of permanently affordable housing by fulfilling its enforceable obligations which require OCII to fund and otherwise facilitate the construction of thousands of affordable housing units. OCII will maximize its contribution by continuing to leverage tax increment funding with outside funding sources wherever possible to ensure timely delivery of affordable units pursuant to</p>	<p>This implementation measure continues an existing requirement for OCII to fund and otherwise facilitate the construction of thousands of affordable housing units and would not be expected to result in physical changes on the environment.</p>

those enforceable obligations.	
Implementation Program 62: MOH, and SFHA will continue efforts to provide financial support to nonprofit and other developers of affordable housing, through CDBG and other funding sources.	This would continue an existing and ongoing effort lead by MOH and SFHA that is administrative in nature (related to funding) and would not be expected to result in physical changes on the environment.
Implementation Program 63: The City’s housing agencies shall keep apprised of federal and state affordable housing funds and other grant opportunities to fund affordable housing for the City of San Francisco, and shall work with federal Representatives to keep the abreast of the specifics of the housing crisis in San Francisco. MOH, MOCD and other agencies shall continue to use such funds for affordable housing.	This would continue an existing coordination effort between the City’s housing agencies to share information and stay updated on affordable housing funding and grant opportunities. It is administrative in nature and would not be expected to result in physical changes on the environment.
Implementation Program 70: The City shall continue to implement the Housing Trust Fund. The San Francisco Housing Trust Fund was a ballot-initiative measure that was passed in November of 2012. The Housing Trust Fund begins in year one with a general fund revenue transfer of \$20 million and increases to \$50 million over time. The Housing Trust Fund will capture revenue from former Redevelopment Agency Tax Increment funds (an example of what is being referred to as “boomerang” funds in post-redevelopment California), a small portion of the Hotel Tax which has been appropriated yearly for affordable housing, plus an additional \$13 million in new General Fund revenue from an increase in business license fees. The consensus business tax reform measure, Proposition E, which also passed on the November ballot, will generate \$28.5 million in the first year—\$13 million of which will go to fund affordable and workforce housing. It is estimated that \$1.5 billion will be invested in affordable housing. In addition to the Housing Trust fund, City Agencies and other institutions will continue to work on additional funding sources for affordable	This would continue an existing and ongoing coordination of OEWD with other agencies and organization regarding the San Francisco Housing Trust Fund. This program is administrative and would not be expected to result in physical changes on the environment.

<p>housing in accordance with the Proposition K Affordable Housing Goals ballot-initiative measure.</p>	
<p>Implementation Program 76: MOH and MOCD shall continue monitoring of all “at risk” or potentially at risk subsidized affordable housing units, to protect and preserve federally subsidized housing.</p>	<p>This would continue an existing and ongoing program lead by MOH and MOCD that is administrative in nature and would not be expected to result in physical changes on the environment.</p>
<p>Implementation Program 78: MOH shall continue to lead a citywide effort, in partnership with SFHA and other City agencies to prioritize and facilitate the preservation and redevelopment of the City’s distressed public housing according to the recommendations of the HOPE SF task force.</p>	<p>This would continue an existing and ongoing program lead by MOH and SFHA that is administrative in nature and would not be expected to result in physical changes on the environment.</p>
<p>Implementation Program 80: Planning shall continue to implement a Preliminary Project Assessment phase to provide project sponsors with early feedback on the proposed project, identify issues that will may overlap among the various departments, and increase the speed at which the project can move through all City review and approval processes.</p>	<p>This would continue an existing and ongoing Planning Department procedure whereby project sponsors receive preliminary feedback from multiple Planning Department divisions regarding their projects. It is administrative in nature and would not be expected to result in physical changes on the environment.</p>
<p>Implementation Program 83: Planning shall continue to implement tools and processes that streamline CEQA compliance, thereby reducing the time required for production of environmental documents and CEQA processes. In addition to contracting with previously established pools of qualified consultants to produce necessary technical studies (e.g., transportation) and environmental documents (e.g., EIRs), Planning will continue to implement streamlined processes where appropriate, including but not limited to: Community Plan Exemptions that tier from previously certified Community Plan EIR’s; participate in the preparation of Preliminary Project Assessments that outline the anticipated requirements for CEQA compliance, including necessary technical studies; and</p>	<p>This would continue an existing and ongoing Planning Department procedures concerning streamlining CEQA review. Procedures included in this implementation program are administrative in nature and would not be expected to result in physical changes on the environment.</p>

<p>implement recent and pending updates to the CEQA Guidelines that provide mechanisms for streamlining the environmental assessment of infill development projects.</p>	
<p>Implementation Program 89: Planning Department staff shall continue to develop a process for Neighborhood Design Guideline review and approval including developing next steps for public dissemination.</p>	<p>This would continue an existing and ongoing Planning Department procedure that is administrative in nature and would not be expected to result in physical changes on the environment.</p>
<p>Implementation Program 91: The Planning Department has a completed draft of the Preservation Element and the final document will undergo Environmental Review in 2015.</p>	<p>This reflects the completion of an update to the Preservation Element of the General Plan. As noted, the Preservation Element will be subject to a separate environmental review process. However, it is expected that the overarching goals and objectives of the Preservation Element related to housing will be aligned with those articulated in the 2014 Housing Element concerning preservation issues since it is intended to encourage and promote preservation and building retention. Thus, it would not have a significant impact on the environment.</p>
<p>Implementation Program 94: The Planning Department’s “Implementation Group” shall continue to manage the implementation of planned growth areas after Plan adoption, including programming impact fee revenues and coordinating with other City agencies to ensure that needed infrastructure improvements are built.</p>	<p>This would continue an existing and ongoing Planning Department procedure that is administrative in nature and would not be expected to result in physical changes on the environment.</p>
<p>Implementation Program 95: The Planning Department continues to update CEQA review procedures to account for trips generated, including all modes, and corresponding transit and infrastructure demands, with the Goal of replacing LOS with a new metric measuring the total number of new automobile trips generated. The Planning department is currently refining the metric to be consistent with State Guidelines.</p>	<p>This implementation measure is part of state-mandated efforts and is not associated with the 2014 Housing Element.</p>
<p>Implementation Program 96: Planning</p>	<p>Maintaining and updating the City’s General Plan is one</p>

<p>should maintain and update as necessary other elements of the City's General Plan.</p>	<p>of the Planning Department's preeminent responsibilities and would continue an existing and ongoing process. Any updates to the General Plan elements would be subject to a separate environmental review process.</p>
<p>Implementation Program 97: Planning and the SFMTA continue to coordinate housing development with implementation and the Transit Effectiveness Project (TEP). The TEP adjusts transit routes to increase service, improve reliability, and reduce travel delay to better meet current and project travel patterns throughout the City.</p>	<p>This would continue an existing and ongoing coordination effort between the Planning Department and MTA intended to improve transit services. TEP is subject to a separate environmental review process (discussed on Planning Department's website: http://www.sf-planning.org/index.aspx?page=2970).</p>
<p>Implementation Program 102: Plan Bay Area, the nine-county Bay Area's long-range integrated transportation and land-use housing strategy through 2040, was jointly approved by ABAG and MTC on July 18th, 2013. The Planning Department will continue to coordinate with regional entities for implementation of the Plan.</p>	<p>This strategy was completed and approved and is not expected to result in physical changes on the environment.</p>
<p>Implementation Program 103: The San Francisco County Transportation Authority (SFCTA) was supportive of MAP-21 the latest Federal Transportation Reauthorization Act and continues to play an active role in federal transportation dollars that support transit-oriented development. In March of 2014 the SFCTA lead staff as well as SFCTA commissioners traveled to DC to speak to federal transportation officials about Bay Area transportation priorities. SFCTA will continue to advocate at the federal level for transit-oriented development.</p>	<p>This implementation program formalizes the SFCTA's advocacy at the federal level for transit-oriented development. It is consistent with objectives and policies included in the 2009 Housing Element that were studied in the FEIR and as well as objectives and policies included in the 2014 Housing Element. This implementation program, however, is administrative in nature and is not expected to result in physical changes on the environment.</p>

TABLE A-2
Deleted 2009 Housing Element Implementation Programs

Deleted 2009 Housing Element Implementation Programs	Physical Implications of Implementation Program Deletions
<p>Implementation Program 36: Mayor and the Board of Supervisors shall continue efforts to meet the goal of the Next Generation SF agenda, including planning for and/or acquiring sites for 3,000 family units by 2011. Units will be completed based on funding availability</p>	<p>In the past several years, San Francisco has done a significant amount of work around identifying funds for affordable housing and developing a strategy for expenditures. This implementation program refers to a prior planning process that is now superseded by work as part of the Housing Trust Fund, the Mayor's Working Group and other MOHCD work. The deletion of this implementation measure is not expected to result in physical changes on the environment.</p>
<p>Implementation Program 61: Under the oversight of the Capital Planning Committee, the City shall formalize an interagency grant committee tasked with creating a coordinated grant strategy for pursuing stimulus funds for housing and supporting infrastructure.</p>	<p>Since the 2009 Housing Element, the City has become more strategic in prioritizing infrastructure for the various competitive funding sources. However this coordination did not result in a formal inter-agency committee. This implementation program is no longer relevant to ongoing work around interagency coordination for infrastructure funding. The deletion of this implementation measure is not expected to result in physical changes on the environment.</p>