SAN FRANCISCO
PLANNING DEPARTMENT

1650 Mission St.
Suite 400
San Francisco,
CA 94103-2479

Reception:
415.558.6378

Fax:
415.558.6409

Planning
Information:
415.558.6377

Initial Study – Community Plan Evaluation

Case No.:	**2015- 001639ENV**
Project Title:	**1170-1180 Harrison Street**
Zoning/Plan Area:	Western SoMa Mixed Use - General (WMUG) District Western SoMa Special Use District 55-X Height and Bulk District
Block/Lot:	3755/029
Lot Size:	9,796 square feet
Plan Area:	Western SoMa Community Plan
Project Sponsor:	Ronaldo Cianciarulo – Buddha Properties, LLC (415) 371-8333, Ronaldo@rjcgroup.com
Staff Contact:	David Young (415) 575-9041, David.L.Young@sfgov.org

PROJECT DESCRIPTION

The approximately 9,796-square-foot (sf) project site is located on a corner lot, Block 3755, Lot 029, in the South of Market neighborhood and Western SoMa Special Use District. The site is within the West SoMa Mixed Use-General (WMUG) zoning and 55-X Height and Bulk districts and Western SoMa Light Industrial and Residential Historic District. The lot consists of an irregular shaped parcel on a block bounded by Berwick Place to the northeast, Harrison Street to the southeast, 8th Street to the southwest and Heron Street to the northwest. Harrison Street is classified as a secondary transit street. There is a San Francisco Municipal Transportation Agency (SFMTA) stop at the southeast corner of Harrison Street and 8th Street. The lot is occupied by an approximate 10,088-gross-square-foot (gsf), one-story industrial building with a mezzanine.

The existing building consists of two structures totaling 10,088 gsf and is 30-feet in height. The east portion of the building was constructed in 1912 and the west portion of the building was constructed in 1929. The sections were unified in 1929. Buildings in the vicinity of the project range from one story to four stories in height. The project involves changing the use of the existing one-story industrial warehouse, with a mezzanine, into three-stories of office space totaling 21,682 gsf. The proposed first two-stories would be built within the existing structure and the proposed partial third level penthouse addition totaling 3,261 gsf would be built at the northwest corner of the building and would be stepped approximately 19'6" back from the existing facade to shield it from public view and visibly from Harrison Street and Berwick Place. The first level would have a two-story lobby with an elevator, open stair, and two open office spaces. The second floor would be set back from the front of the building to emphasize the building's tall ceilings, restored trusses, and roof monitors.[1] The long sides of monitors usually contain clerestory windows or louvers to light or ventilate the area under the roof.[2] The third level, recessed from both Harrison Street and Berwick Place, would have an open office space and a 947 gsf roof deck facing Harrison Street. There

[1] A roof monitor is a raised structure running along the ridge of a double-pitched roof, with its own roof running parallel with the main roof.

would be a new stairwell at the rear of the building serving all floors and a fire rated hallway on the ground floor that exits to Berwick Place. There would be new restrooms and life-safety systems on all floors. In total, the proposed project would result in 21,682 gsf of office use and would increase the height of the building to 38'- 6".

The project proposes preservation of the existing structure to retain its historical integrity including the main roof monitor and clerestory windows.[3] All renovations would be completed in compliance with the Secretary of the Interior's Standards. To retain the historic appearance of the building's exterior, the project includes several design features to avoid obstructing the original windows. Preservation strategies include recessing all new interior floor plates from the façade and restoring the original window frames and garage door opening widths. The existing roll up doors would be replaced with two new entry doors to provide the main access to the building. The project would include four Class 1 bicycle spaces on the first floor and two Class 2 bicycle spaces on the sidewalk along the Harrison Street frontage.[4] No off-street parking is proposed.

The project would require the excavation of approximately 775 cubic yards of material to a depth of up to six feet below grade to accommodate the new elevator pit and a new mat slab foundation. The two existing 20-foot-long curb cuts on Harrison Street would be removed and filled in. The project is anticipated to take 8 months to construct.

Project Approvals

The proposed project would require the following approval:

Department of Building Inspection

- Building Permit

The proposed project is subject to notification under Planning Code Section 312. If discretionary review before the Planning Commission is requested, the discretionary review action constitutes the Approval Action for the specific building being reviewed. If no discretionary review is requested, the issuance of the building permit application by the Department of Building Inspection constitutes the Approval Action for the specific building being reviewed. The Approval Action date establishes the start of the 30-day appeal period for this CEQA determination pursuant to Section 31.04(h) of the San Francisco Administrative Code.

COMMUNITY PLAN EVALUATION OVERVIEW

This initial study evaluates whether the environmental impacts of the proposed project are addressed in the Programmatic Environmental Impact Report for the Western SoMa Community Plan, Rezoning of Adjacent Parcels, and 350 Eighth Street Project (Western SoMa PEIR).[5] The initial study indicates whether the proposed project would result in significant impacts that: (1) are peculiar to the project or project site; (2) were not identified as significant project-level, cumulative, or off-site effects in the PEIR; or (3) are

[3] Clerestory windows are an outside wall of a room or building that rises above an adjoining roof that contain windows.

[4] Per Planning Code Section 155.1, Class I bicycle spaces are in secure, weather-protected facilities intended for use as long-term, overnight, and work-day bicycle storage by dwelling unit residents, non-residential occupants, and employees.

[5] San Francisco Planning Department, *Western SoMa Community Plan, Rezoning of Adjacent Parcels, and 350 Eighth Street Project Final Environmental Impact Report* (PEIR), Planning Department Cases No. 2008.0877E and 2007.1035E, State Clearinghouse No. 2009082031, certified December 6, 2012. Available online at: http://sf-planning.org/area-plan-eirs, accessed September 25, 2017.

previously identified significant effects, which as a result of substantial new information that was not known at the time that the Western SoMa PEIR was certified, are determined to have a more severe adverse impact than discussed in the PEIR. Such impacts, if any, will be evaluated in a project-specific Mitigated Negative Declaration or Environmental Impact Report. If no such topics are identified, the proposed project is exempt from further environmental review in accordance with Public Resources Code Section 21083.3 and CEQA Guidelines Section 15183.

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

The Western SoMa PEIR identified significant impacts related to cultural and paleontological resources, transportation and circulation, noise and vibration, air quality, wind and shadow, biological resources, and hazards and hazardous materials. Additionally, the PEIR identified significant cumulative impacts related to cultural and paleontological resources, transportation and circulation, noise, air quality, and shadow. Mitigation measures were identified for the above impacts—aside from shadow—and reduced said impacts to less-than-significant levels except for those related to cultural and paleontological resources (cumulative impacts from demolition of historic resources), transportation (program-level and cumulative traffic impacts at three intersections; and cumulative transit impacts on several Muni lines), noise (cumulative noise impacts), and air quality (program-level TACs and PM2.5 pollutant impacts, program-level and cumulative criteria air pollutant impacts).

The project involves transforming the existing one-story industrial warehouse with a mezzanine into three-stories of office space. No on-site or off-site parking is proposed.

As discussed in this initial study, the proposed project would not result in new significant environmental effects or effects of greater severity than were already analyzed and disclosed in the Western SoMa PEIR.

AESTHETICS AND PARKING IMPACTS FOR TRANSIT PRIORITY INFILL DEVELOPMENT

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

a) The project is in a transit priority area;

b) The project is on an infill site; and

c) The project is residential, mixed-use residential, or an employment center.

The proposed project meets each of the above three criteria and thus, this initial study does not consider aesthetics or parking in determining the significance of project impacts under CEQA. Project elevations are included in the project description.

AUTOMOBILE DELAY AND VEHICLE MILES TRAVELED

In addition, CEQA Section 21099(b)(1) requires that the State Office of Planning and Research (OPR) develop revisions to the CEQA Guidelines establishing criteria for determining the significance of transportation impacts of projects that "promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses." CEQA

Section 21099(b)(2) states that upon certification of the revised guidelines for determining transportation impacts pursuant to Section 21099(b)(1), automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment under CEQA.

In December 2018, the California Natural Resources Agency certified and adopted the CEQA Guidelines update package, including the Guidelines section implementing Senate Bill 743 (§ 15064.3). The Technical Advisory On Evaluating Transportation Impacts in CEQA provides technical information on how to assess VMT as part of a transportation impacts analysis under CEQA.[6] The San Francisco Planning Commission adopted the OPR's recommendation to use the VMT metric instead of automobile delay to evaluate the transportation impacts of projects on March 3, 2016 (Resolution No. 19579). The VMT metric does not apply to the analysis of project impacts on non-automobile modes of travel such as riding transit, walking, and bicycling. Therefore, impacts and mitigation measures from the Western SoMa PEIR associated with automobile delay are not discussed in this checklist, including PEIR Mitigation Measure M-TR-1c: Traffic Signal Optimization (8th/Harrison/I-80 WB off-ramp). Instead, a VMT analysis is provided in the Transportation and Circulation section.

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

The Western SoMa PEIR determined that adoption of the *Western SoMa Community Plan* would not result in a significant impact related to land use. The Western SoMa PEIR anticipated that future development under the Community Plan would result in more cohesive neighborhoods and would include more clearly defined residential, commercial, and industrial areas. No mitigation measures were identified in the PEIR.

The division of an established community typically involves the construction of a physical barrier to neighborhood access, such as a new freeway, or the removal of a means of access, such as a bridge or a roadway. The Western SoMa PEIR determined that implementation of the *Western SoMa Community Plan* would not construct any physical barriers to neighborhood access or remove any existing means of access that could physically divide established communities.

[6] This document is available at: *http://www.opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf* . Accessed January 28, 2019

With the approval of the Western SoMa Community Plan, the project site was rezoned from Service/Light Industrial/Residential (SLR) and to Western SoMA Mixed Use – General (WMUG) and the height and bulk district was changed from 40-X to 55-X. The WMUG district supports a flexible mix of smaller neighborhood serving, commercial, institutional, and industrial/PDR uses. The height of the renovated building would increase from 30' to 38'- 6", which is within the allowable range for the 55-X height and bulk district. The proposed office use is a permitted use within historic buildings in the WMUG zoning district. The existing building in a known historic resource, and therefore, office uses are a permitted use on the project site. The project is rehabilitating an existing historic building; therefore, the project would not change the existing character of the site or vicinity. The Citywide Planning and Current Planning divisions of the Planning Department have determined that the proposed project is permitted in the WMUG (WSoMa Mixed Use General) Zoning District and 55-X Bulk District; therefore, is consistent with the height, density, and land uses as specified in the Western SoMa Community Plan, maintaining the mixed character of the area by encouraging residential and commercial development. Ordinance No. 42-13, Amending the Planning Code, by Adding and Amending Various Sections to Implement the Goals, Objectives, and Policies of the Western South of Market Area, was approved by the Planning Commission on March 4, 2013. The Western SoMa Community Plan was adopted by the Board of Supervisors on March 19, 2013. For these reasons, implementation of the proposed project would not result in significant impacts related to land use beyond those identified in the Western SoMa PEIR.

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

One of the objectives identified in the Western SoMa Community Plan is to promote a wide range of neighborhood-serving commercial uses north of Harrison Street and to maintain the existing scale of the neighborhood. Residential development in the Western SoMa Community Plan area has increased the demand for businesses that serve the new and existing residents. The Western SoMa Community Plan PEIR assumed 6,340 additional residents and approximately 6,350 additional jobs through 2030. The PEIR concluded that development and growth in the Plan Area and on the Adjacent Parcels would be expected to occur even without Plan implementation.

The proposed office project includes interior and exterior renovations, the conversion of existing interior space, and additional office space on the new third floor, in the same location and building envelope of the existing structure. Existing utilities would be used serve the project. The project would increase the square footage of the existing building by approximately 11,337 square feet and add up to 78 new workers

depending on square footage per employee.[7] The increase in office square footage and subsequent employment and indirect population increases are within the range and scope of the growth anticipated under the *Western SoMa Community Plan* and evaluated in the Western SoMa PEIR.

The Western SoMa PEIR determined that the anticipated increases in population would not result in significant adverse physical effects on the environment. No mitigation measures were identified in the PEIR.

For these reasons, the proposed project would not result in significant impacts related to population and housing beyond those identified in the Western SoMa PEIR.

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

Historic Architectural Resources

Pursuant to CEQA Guidelines Sections 15064.5(a)(1) and 15064.5(a)(2), historical resources are buildings or structures that are listed, or are eligible for listing, in the California Register of Historical Resources or are identified in a local register of historical resources, such as Articles 10 and 11 of the San Francisco Planning Code. The Western SoMa PEIR identified significant and unavoidable impacts related to causing a substantial adverse change in the significance of a historic resource through demolition.

The project site is located in the Western SoMa Light Industrial and Residential Historic District developed primarily between 1906 and 1936. This district consists of a group of historic resources that are cohesive in scale, building typology, materials, architectural style, and relationship to the street. Contributors to the Western SoMa Light Industrial and Residential Historic District are mostly light industrial and residential uses with some commercial properties. The Historic District is significant under Criterion A (Events) as a representation of a noteworthy trend in development patterns and the establishment of ethnic groups in San Francisco. It is also significant under the National Register Criterion C (Design/Construction) as a

[7] San Francisco Planning Department. *Transportation Impact Analysis Guidelines for Environmental Review.* October 2002. Available at: https://sf-planning.org/transportation-impact-analysis-guidelines-environmental-review-update.

representation of a group of properties that embody the distinctive characteristics of a type, period, or method of construction, and as a representation of a significant and distinguishable entity whose components may lack individual distinction.

The building on the project site consists of two structures. The east portion of the building was constructed in 1912 and the west portion of the building was constructed in 1929. The sections were unified in 1929. The building was evaluated as part of the South of Market Historic Resource Survey, which was adopted by the Historic Preservation Commission in July 2010. Based on the survey, the existing building was assigned a California Historic Resource Status Code of 3D, which defines the structure as "appears eligible for National Register as a contributor to a National Register eligible district through survey evaluation". The structure has also been determined to be individually eligible for the California Register of Historical Resources for Criterion 3 - Architecture and is therefore considered to be a historic resource by the San Francisco Planning Department.[8] The Preservation Team Review (PTR) concluded that the proposed project would not materially impair the identified Western SoMa Light Industrial and Residential Historic District and would not cause a significant adverse impact to the historic resource.[9] The period of significance has been determined to be 1913-1929. This time period reflects the building's original construction as a light industrial building in the South of Market neighborhood and the date of the building's expansion and remodeling into its characteristic Art Moderne style.

The project involves the rehabilitation of an existing building including exterior and interior improvements. The *Historic Building Maintenance Plan* (Building Maintenance Plan) was developed as required per planning code section 803.9 (a) in accordance with the *Secretary of the Interior's Standards for the Treatment of Historic Properties* and the *California Historic Building Code Rehabilitation*.[10] The Building Maintenance Plan includes the following restoration requirements: restoring portions of the building façade by repairing exterior concrete, restoring window and storefront steel frames, replacing single pane glazing, and restoring bay garage opening heights with new aluminum frame glass doors. Proposed exterior building alterations would involve constructing a new third floor addition with deck with partial retention of western roof monitor, new roof top mechanical systems that would be screened from adjacent properties and the public right of way, new skylight on top of the third efloor roof, and new storefront entries within the existing two bay garage doors.

Other proposed interior improvements would include a partial third floor story penthouse addition, new mat foundation and floor slab throughout, new interior shotcrete walls, two new steel braced frames, new columns, and a floor system supporting the second and partial third floor. The new double floor height lobby would include open stairs, an elevator, one set of restrooms on each floor, and new exit stair well and corridors.

The proposed project activities would not result in the demolition or substantial alteration of the historic resource and would not contribute to the significant historic resource impact that was identified in the Western SoMa PEIR. Full analysis of the proposal and consistency with the Secretary of Interior Standards is included in the Historic Preservation Commission Resolution No. 1003, dated December 5, 2018. A

[8] San Francisco Planning Department, Preservation Team Review Form: 1170 – 1180 Harrison Street, San Francisco, January 27, 2019.

[9] San Francisco Planning Department, Preservation Team Review Form, Ibid

[10] Architectural Resource Group. *Historic Building Maintenance Plan- 1170 Harrison Street, San Francisco, CA*. June 2018.

preservation team review, prepared on January 18, 2019, concluded that the building's new use would maintain and not impact the building's historic integrity and historic status.

The project site is adjacent to eligible historic resources; in January 2011, the abovementioned South of Market Historic Resource survey identified the existing buildings at 1144 Harrison Street and 1184 Harrison Street as historic resources. Therefore, project-related construction activities would have the potential to damage these historic resources. The Western SoMa PEIR identified two mitigation measures that would reduce construction-related impacts on historic resources to less-than-significant levels.

PEIR Mitigation Measure M-CP-7a: Protect Historical Resources from Adjacent Construction Activities requires project sponsors to ensure that construction contractors use all feasible means to avoid damage to adjacent and nearby historic buildings. Such methods may include maintaining a safe distance between the construction site and the historic buildings, using construction techniques that reduce vibration, using appropriate excavation shoring methods to prevent movement of adjacent structures, and providing adequate security to minimize risks of vandalism and fire. PEIR Mitigation Measure M-CP-7a, discussed under Project Mitigation Measure 2 in the Mitigation Measures section below, is applicable to the proposed project.

PEIR Mitigation Measure M-CP-7b: Construction Monitoring Program for Historical Resources requires project sponsors to monitor adjacent historic resources for damage caused by project-related construction activities, especially when heavy equipment is used, and to repair any damage that may occur. PEIR Mitigation Measure M-CP-7b, discussed under Project Mitigation Measure 3 in the Mitigation Measures section below, is applicable to the proposed project.

For these reasons, the proposed project would not result in significant impacts on historic architectural resources beyond those identified in the Western SoMa PEIR.

Archeological Resources

The Western SoMa PEIR determined that implementation of the *Western SoMa Community Plan* could result in significant impacts on archeological resources and identified two mitigation measures that would reduce potential impacts to less than-significant levels. PEIR Mitigation Measure M-CP-4a: Project-Specific Preliminary Archeological Assessment, and M-CP-4b: Procedures for Accidental Discovery of Archeological Resources, apply to projects involving any soils-disturbing or soils-improving activities, including excavation to a depth of five or more feet below grade. As the proposed project would involve excavation up to six feet for the foundations and elevator shaft, PEIR Mitigation Measures M-CP-4a and M-CP-4b are applicable to the proposed project.

In accordance with PEIR Mitigation Measure M-CP-4a, the Planning Department's archeologist conducted a Preliminary Archeology Review (PAR) of the project site and the proposed project.[11] There are no known or suspected resources at the project site and low potential to adversely affect archeological resources. The PAR determined that the project would not have the potential to adversely affect an archeological resource.

The proposed project is subject to PEIR Mitigation Measure M-CP-4b to reduce potential impacts from accidental discovery of buried archeological resources during project construction to less-than-significant

[11] San Francisco Planning Department. *Environmental Planning Preliminary Archeological Review*. July 19, 2018

levels. With implementation of this mitigation measure (Project Mitigation Measure 4), the proposed project would not result in significant impacts related to archeological or paleontological resources.

For the reasons above, the proposed project would not result in significant impacts on cultural, archeological, or paleontological resources beyond those identified in the Western SoMa PEIR.

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

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

The Western SoMa PEIR anticipated that growth resulting from the zoning changes would not result in significant impacts related to pedestrians, bicyclists, emergency access, or construction. Transportation system improvements included as part of the Western SoMa Community Plan were identified to have significant impacts related to loading, but the impacts were reduced to less-than-significant levels with mitigation.

The Western SoMa PEIR anticipated that adoption of the Western SoMa Community Plan could result in significant impacts on traffic, transit and loading, and identified three transportation mitigation measures. One mitigation measure reduced loading impacts to less-than-significant levels. Even with mitigation,

however, it was anticipated that the significant cumulative impacts on transit lines could not be fully mitigated. Thus, these impacts were found to be significant and unavoidable.

As previously discussed under "Automobile Delay and Vehicle Miles Traveled," in response to state legislation that called for removing automobile delay from CEQA analysis, the Planning Commission adopted Resolution No. 19579 replacing automobile delay with a vehicle-miles-traveled (VMT) metric for analyzing transportation impacts of a project. Therefore, impacts and mitigation measures from the Western SoMa PEIR associated with automobile delay are not discussed in this checklist.

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

Vehicle Miles Traveled (VMT) Analysis

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

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

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

For office development, the existing regional average daily VMT per capita is 17.2. Average daily VMT for office development is projected to decrease under future 2040 cumulative conditions. See **Table 1:** Daily Vehicle Miles Traveled, which includes the TAZ, 629, in which the project site is located.

Table 1: Average Daily Vehicle Miles Traveled

Land Use	Existing			Cumulative 2040		
	Bay Area Regional Average	Bay Area Regional Average minus 15%	TAZ Average	Bay Area Regional Average	Bay Area Regional Average minus 15%	TAZ 629 Average
Office	17.2	16.2	8.4	14.5	13.7	7.0

A project would have a significant effect on the environment if it would cause substantial additional VMT. The State Office of Planning and Research's (OPR) *Technical Advisory On Evaluating Transportation Impacts in CEQA* recommends screening criteria to identify types, characteristics, or locations of projects that would not result in significant impacts to VMT. If a project meets one of the three screening criteria provided (Map-Based Screening, Small Projects, and Proximity to Transit Stations), then it is presumed that VMT impacts would be less than significant for the project and a detailed VMT analysis is not required. Map-Based Screening is used to determine if a project site is located within a TAZ that exhibits low levels of VMT. Small Projects are projects that would generate fewer than 100 vehicle trips per day. The Proximity to Transit Stations criterion includes projects that are within a half-mile of an existing major transit stop, have a floor area ratio that is equal to or greater than 0.75, vehicle parking that is less than or equal to that required or allowed by the Planning Code without conditional use authorization, and are consistent with the applicable Sustainable Communities Strategy.

The project site is located in Traffic Analysis Zone (TAZ) 629. In TAZ 629, the existing average daily household VMT per capita is 8.4 and the future 2040 average daily household VMT per capita is estimated to be 7.0. Given that the project site is located in an area in which the existing and future 2040 residential VMT would be more than 15 percent below the existing and future 2040 regional averages, the proposed project's office use would not result in substantial additional VMT, and impacts would be less than significant. Furthermore, the project site meets the Proximity to Transit Stations screening criterion, which also indicates the proposed project uses would not result in substantial increase in VMT.

Induced Automobile Travel Analysis

A proposed project would have a significant effect on the environment if it would substantially induce additional automobile travel by increasing physical roadway capacity in congested areas (i.e., by adding new mixed-flow lanes) or by adding new roadways to the network. The OPR's transportation impact guidelines include a list of transportation project types that would not likely lead to a substantial or measurable increase in VMT. If a project fits within the general types of projects (including combinations of types), then it is presumed that VMT impacts would be less than significant, and a detailed VMT analysis is not required.

The proposed project is not a transportation project and would not include features that would alter the transportation network. The existing two curb cuts on Harrison Street would be filled in. The project proposal to remove the existing curb cuts would not substantially induce automobile travel. Based on the VMT information provided in the San Francisco Transportation Information Map, Vehicles and Parking Report, and the CEQA Section 21099 Checklist for 1170 Harrison Street, the impacts would be less than significant.

Trip Generation

The proposed project consists of renovations and improvements to an existing building and proposes to provide four Class I Bicycle Parking Spaces and two Class II Bicycle Parking Spaces and no off-street parking spaces.

Localized trip generation of the proposed project was calculated using a trip-based analysis and information in the *2002 Transportation Impacts Analysis Guidelines for Environmental Review* (SF Guidelines) developed by the San Francisco Planning Department.[12] The proposed project would generate an estimated 391 person trips (inbound and outbound) on a weekday daily basis, consisting of 242 person trips by auto, 75 transit trips, 49 walk trips, and 25 trips by other modes. During the p.m. peak hour, the proposed project would generate an estimated 23 trips by auto, seven transit trips, three walk trips, and one by other modes.

Transit

The project site is well served by public transportation. The San Francisco Municipal Railway (Muni) operates the following bus lines: Within one-quarter mile of the project site: 12, 14X, 19, 27, 47, 8, 83X, 8AX, and 8BX

According to the *Western SoMa Community Plan Transportation Impact Study*, all of the transit lines serving the Plan Area are currently operating well-below Muni's capacity utilization (the number of passengers on board a transit vehicle relative to the total capacity) of 85 percent.[13] The proposed project would generate a total of 120 daily transit trips and 14 p.m. peak-hour transit trips, which would be distributed among the multiple transit lines serving the project vicinity. These daily and p.m. peak-hour transit trips represent a minor contribution to overall transit demand in the Plan Area that would be accommodated by existing transit capacity. The proposed project would not result in unacceptable levels of transit service or cause an increase in transit service delays or operating costs.

As discussed above, the Western SoMa PEIR identified significant cumulative impacts related to delays in transit service. The proposed project would not contribute considerably to this impact, because its contribution of an estimated 75 daily and seven p.m. peak-hour transit trips would not be a substantial proportion of the overall traffic volume or the new vehicle trips generated by *Western SoMa Community Plan* projects.

For these reasons, the proposed project would not result in significant impacts related to transit beyond those identified in the Western SoMa PEIR.

Bicycles

Within 250 feet of the project site, there is one Class IV bike lane (separated bicycle lane from vehicle traffic) on 8th Street. As stated above**,** the proposed project would generate an estimated one p.m. peak hour trip by "other" modes, which includes bike trips. The project would provide four Class I bicycle spaces on the first floor and two Class II bicycle spaces along the frontage of Harrison Street. Bicycle trips from the

[12] *Ibid*.

[13] LCW Consulting, Western SoMa Community Plan Transportation Impact Study, Table 4, June 2012.

proposed project would be sufficiently accommodated within these facilities and would not interfere with bicycle accessibility to the site and adjoining area. Although the proposed project would result in an increase in the number of vehicles in the vicinity of the project site, this anticipated increase in vehicle trips would not be substantial enough to create potentially hazardous conditions for bicyclists.

Furthermore, the proposed project would not modify any existing bicycle facilities or include any design features that would create hazards for bicyclists or interfere with bicycle access or circulation. The proposed project would not create potentially hazardous conditions for bicyclists or otherwise substantially interfere with bicycle accessibility to the site or adjoining areas, and the proposed project would have a less than significant impact on bicycles.

Pedestrians

The Western SoMa PEIR acknowledged that the Western SoMa is in an area of San Francisco with one of the highest concentrations of pedestrian injuries and deaths. Pedestrian volumes within the Plan area are low to moderate, with higher pedestrian volumes along portions of Townsend, Brannan, and Bryant Streets, and near the Caltrain terminal at Fourth and King Streets. The PEIR identified a number of transportation system improvements that are near the vicinity of the project site which include the following:

Posting of "truck route" signs on Ninth, Tenth, Harrison, and Bryant Streets; installation of new signalized mid-block pedestrian crossings at Eighth and Natoma Streets; installation of streetscape and traffic calming improvements on Minna, Natoma, and Ringold Streets; installation of sidewalk extensions/bulb-outs on Folsom Street between Fourth Street and 13th Street; and installation of gateway treatments at and in the vicinity of freeway off-ramps.

The PEIR states that new pedestrian trips generated by development under the community plan would be accommodated on the existing sidewalks and would not substantially affect pedestrian operation on nearby sidewalks and crosswalks. While the frequency of conflict between pedestrians and vehicles could likely increase as traffic volumes increase along with increases in pedestrian exposure associated with residential and non-residential development, implementation of the plan would not be expected to have a significant impact on existing pedestrian conditions because neither vehicle traffic volumes nor pedestrian activity would increase to such a degree that a substantial increase in conflicts would be anticipated. Therefore, the PEIR found impacts on pedestrians to be less than significant.

The proposed project would generate approximately 49 pedestrian trips. The new pedestrian trips could be accommodated on existing sidewalks and crosswalks adjacent to the project site. The project would not substantially overcrowd the sidewalk along Harrison Street or 8th Street, which are approximately 12 feet wide. Implementation of the proposed project would improve pedestrian circulation by reducing the number of curb cuts at the project site. The proposed project would not create potentially hazardous conditions for pedestrian or otherwise substantially interfere with pedestrian accessibility to the site and adjacent areas. Although the project site is identified as being in a high-injury corridor as defined by Vision Zero, which is the City's adopted road safety policy that aims for zero traffic deaths in San Francisco by 2024, the proposed project would not result in significant project-level or cumulative pedestrian impacts that were not identified in the Western SoMa PEIR.

Loading

The Western SoMa PEIR analyzed loading impacts associated with development projects and streetscape projects that would be implemented under the *Western SoMa Community Plan*. The analysis provided an overall comparison of proposed loading space supply to the Planning Code requirements and discussed the extent to which the estimated daily and peak-hour loading demand would affect loading conditions throughout the Plan Area. Based on the development anticipated under the Western SoMa PEIR, implementation of the *Western SoMa Community Plan* would generate about 446 delivery and service vehicle trips per day and a demand of about 26 loading spaces during the peak hour of loading activities throughout the Plan Area.

Because it is expected that individual development projects implemented under the *Western SoMa Community Plan* would include off-street loading spaces consistent with Planning Code requirements, the loading demand generated by these development projects would be accommodated within the combination of proposed off-street loading spaces and existing and new on-street loading spaces. Therefore, loading impacts would be less than significant.

Pursuant to Planning Code Section 152.1, the proposed project is required to provide one off-street loading space, because it includes more than 10,001 but less than 30,000 square feet of office uses. There is an on-street loading zone on Harrison Street, in front of the project site. The proposed project would generate approximately 4.5 loading trips per day, which equates to an average peak-hour loading demand of less than one loading trip per hour. The peak loading demand for the proposed project could be met by the existing on-street loading zone.

The Western SoMa PEIR stated that the *Western SoMa Community Plan's* transportation system improvements such as the widening of sidewalks and the construction of bulb-outs within the Plan Area, specifically along Folsom Street between 4th and 13th streets, could affect the existing supply of on-street commercial vehicle loading spaces. The PEIR identified Mitigation Measure M-TR-4: Provision of New Loading Spaces on Folsom Street, to reduce potential loading impacts on Folsom Street to less-than-significant levels.

This mitigation measure would be applicable to the removal of any commercial vehicle loading spaces on Folsom Street within the Plan Area due to proposed transportation improvements and requires project sponsors to coordinate with the SFMTA to install new commercial vehicle loading spaces of equal length, on the same block, and on the same side of the street at locations where commercial vehicle loading spaces are removed. The project site is located on Harrison Street and, therefore, Mitigation Measure M-TR-4 would not apply. For these reasons, the proposed project would not result in significant loading impacts beyond those identified in the Western SoMa PEIR.

Topics:	*Significant Impact Peculiar to Project or Project Site*	*Significant Impact not Identified in PEIR*	*Significant Impact due to Substantial New Information*	*No Significant Impact not Previously Identified in PEIR*
5. NOISE—Would the project:				
a) Result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☐	☒

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

The Western SoMa PEIR identified potential conflicts related to residences and other noise-sensitive uses in proximity to noise-generating uses such as PDR, retail, entertainment, cultural/institutional/educational, and office uses. In addition, the Western SoMa PEIR noted that implementation of the *Western SoMa Community Plan* would incrementally increase traffic-generated noise on some streets in the Plan Area and would result in construction noise impacts from pile driving and other construction activities. The Western SoMa PEIR identified six noise mitigation measures that would reduce noise impacts to less-than-significant levels.[14]

PEIR Mitigation Measure M-NO-1c: Siting of Noise-Generating Uses: requires a noise analysis for new development including commercial, industrial, or other uses that would be expected to generate noise levels in excess of ambient noise in the project vicinity in order to reduce potential conflicts between existing sensitive receptors and new noise-generating uses. The proposed project includes office uses in an existing, rehabilitated building. As such, it is not anticipated to include noise generating sources or

[14] Western SoMa PEIR Mitigation Measures M-NO-1a, M-NO-1b, and M-NO-1d address the siting of sensitive land uses in noisy environments. In a decision issued on December 17, 2015, the California Supreme Court held that CEQA does not generally require an agency to consider the effects of existing environmental conditions on a proposed project's future users or residents except where a project or its residents may exacerbate existing environmental hazards (California Building Industry Association v. Bay Area Air Quality Management District, December 17, 2015, Case No. S213478. Available at: http://www.courts.ca.gov/opinions/documents/S213478.PDF). As noted above, the Western SoMa PEIR determined that incremental increases in traffic-related noise attributable to implementation of the *Western SoMa Community Plan* would be less than significant and thus would not exacerbate the existing noise environment. Therefore, Western SoMa PEIR Mitigation Measures M-NO-1a, M-NO-1b, and M-NO-1d are not applicable. Nonetheless, for all noise-sensitive uses, the general requirements for adequate interior noise levels of Mitigation Measures M-NO-1a and M-NO-1b are met by compliance with the acoustical standards required under the California Building Standards Code (California Code of Regulations Title 24).

substantially increase ambient noise levels over existing levels. Therefore, PEIR Mitigation Measure M-NO-1c is not applicable to the proposed project.

PEIR Mitigation Measures M-NO-2a: General Construction Noise Control Measures: require implementation of noise controls during construction in order to reduce construction-related noise impacts. The proposed project consists of the rehabilitation of an existing building, interior improvements, and a new partial third story. Therefore, PEIR Mitigation Measure M-NO-2a, discussed under Project Mitigation Measure 2 is applicable to the proposed project. Since installation of a new mat slab foundation would not require pile driving and would avoid vibration effects typically generated by pile-driving activities, PEIR Mitigation Measure M-NO-2b is not applicable to the proposed project.

In addition, all construction activities for the proposed project (approximately 8 months) would be subject to the San Francisco Noise Ordinance (Noise Ordinance), which is codified as Article 29 of the San Francisco Police Code. The Noise Ordinance regulates construction noise and requires that construction work be conducted in the following manner: (1) noise levels of construction equipment, other than impact tools, must not exceed 80 dBA[15] at a distance of 100 feet from the source (the equipment generating the noise); (2) impact tools must have intake and exhaust mufflers that are approved by the Director of San Francisco Public Works (SDFPW) or the Director of the Department of Building Inspection (DBI) to best accomplish maximum noise reduction; and (3) if the noise from the construction work would exceed the ambient noise levels at the site property line by 5 dBA, the work must not be conducted between 8:00 p.m. and 7:00 a.m. unless the Director of SFPW authorizes a special permit for conducting the work during that period.

The DBI is responsible for enforcing the Noise Ordinance for private construction projects during normal business hours (8:00 a.m. to 5:00 p.m.), and the Police Department is responsible for enforcing the Noise Ordinance during all other hours. Nonetheless, during the approximately 8 month construction period for the proposed project, occupants of nearby properties could experience construction noise. There may be times when construction noise could interfere with indoor activities in residences and businesses near the project site and be perceived as an annoyance by the occupants of nearby, occupied properties. The increase in project-related construction noise would be temporary and not considered a significant impact. The contractors are subject to mandatory compliance with the Noise Ordinance which would reduce any construction-related noise effects on nearby residences to the greatest extent feasible.

The project site is not located within an airport land use plan area, within two miles of a public airport, or in the vicinity of a private airstrip. Therefore, initial study checklist topics 5e and 5f are not applicable to the proposed project.

For these reasons, the proposed project would not result in significant noise impacts beyond those identified in the Western SoMa PEIR.

[15] The standard method used to quantify environmental noise involves evaluating the sound with an adjustment to reflect the fact that human hearing is less sensitive to low-frequency sound than to mid- and high-frequency sound. This measurement adjustment is called "A" weighting, and the data are reported in A-weighted decibels (dBA).

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

The Western SoMa PEIR identified significant and unavoidable impacts related to violation of an air quality standard, uses that emit diesel particulate matter (DPM), exposure of sensitive land uses to substantial pollutant concentrations, and construction emissions. The Western SoMa PEIR identified five mitigation measures that would help reduce air quality impacts; however, due to the uncertain nature of future development proposals that would result from adoption of the *Western SoMa Community Plan*, it could not be determined whether implementation of these mitigation measures would reduce impacts to less-than-significant levels.

Construction Dust Control

The San Francisco Board of Supervisors approved a series of amendments to the San Francisco Building and Health Codes, generally referred to as the Construction Dust Control Ordinance (Ordinance No. 176-08, effective August 29, 2008). The intent of this ordinance is to reduce amount of fugitive dust emissions generated during and construction to protect the health of the general public, on-site workers, and minimize public nuisance complaints, and avoid orders to stop work by the DBI. The proposed project would include activities that would result in construction dust, primarily from the exterior rehabilitation and foundation work .

In compliance with the Construction Dust Control Ordinance, the project sponsor and contractor responsible for construction activities would be required to implement a combination of measures to reduce construction dust including removing debris and routinely sweeping sidewalks. The regulations and procedures set forth in the Construction Dust Control Ordinance would ensure construction dust impacts would not be significant.

Criteria Air Pollutants

The Bay Area Air Quality Management District (BAAQMD) is the regional agency with jurisdiction over the nine-county San Francisco Bay Area Air Basin. As part of its *CEQA Air Quality Guidelines* (*Air Quality*

Guidelines), the BAAQMD developed screening criteria for determining whether a project's criteria air pollutant emissions would violate an air quality standard, contribute to an existing or projected air quality violation, or result in a cumulatively considerable net increase in criteria air pollutants.[16] Pursuant to the *Air Quality Guidelines*, projects that meet the screening criteria do not have a significant impact related to criteria air pollutants. Criteria air pollutant emissions during construction and operation of the proposed project would meet the *Air Quality Guidelines* screening criteria. The proposed project is approximately 21,537 square feet, which is below both the construction screening criterion and the operational screening criterion for the "General Office Building" land use type. Therefore, the proposed project would not have a significant impact related to criteria air pollutants, and a detailed air quality assessment is not required.

PEIR Mitigation Measure M-AQ-2: Transportation Demand Management Strategies for Future Development Projects: requires projects generating more than 3,500 daily vehicle trips, resulting in excessive criteria pollutant emissions, develop a Transportation Demand Management plan. The proposed project would generate 391 daily vehicle trips. Therefore, PEIR Mitigation Measure M-AQ-2 is not applicable to the proposed project.

Health Risk

Subsequent to certification of the Western SoMa PEIR, the San Francisco Board of Supervisors approved a series of amendments to the San Francisco Building and Health Codes (Ordinance No. 224-14, effective December 7, 2014), generally referred to as Health Code Article 38: Enhanced Ventilation Required for Urban Infill Sensitive Use Developments (Article 38). The purpose of Article 38 is to protect the public health and welfare by establishing an Air Pollutant Exposure Zone (APEZ) and imposing an enhanced ventilation requirement for all urban infill sensitive use development within the APEZ. The project site is within an APEZ. The APEZ, as defined in Article 38, consists of areas that, based on modeling of all known air pollutant sources, exceed health protective standards for cumulative $PM_{2.5}$ concentration and cumulative excess cancer risk. The APEZ incorporates health vulnerability factors and proximity to freeways. Projects within the APEZ, such as the proposed project, 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.

Siting Sensitive Land Uses

For sensitive-use projects within the APEZ as defined by Article 38, the ordinance requires that the project sponsor submit an Enhanced Ventilation Proposal for approval by the Department of Public Health (DPH) that achieves protection from $PM_{2.5}$ (fine particulate matter) equivalent to that associated with a Minimum Efficiency Reporting Value 13 filtration. The DBI would not issue a building permit without written notification from the Director of the DPH that the applicant has an approved Enhanced Ventilation Proposal.

The proposed project is an office building and does not include sensitive receptors; therefore, PEIR Mitigation Measure M-AQ-3 is not applicable to the proposed project, and impacts related to siting new sensitive land uses would be less than significant through compliance with Article 38.

[16] Bay Area Air Quality Management District, *CEQA Air Quality Guidelines*, updated May 2011, pp. 3-2 to 3-3.

Siting New Sources

PEIR Mitigation Measure M-AQ-4: Siting of Uses that Emit $PM_{2.5}$ or DPM and Other TACs, requires analysis of operational emissions for new development that would generate substantial levels of TACs as part of everyday operations, whether from stationary or mobile sources. The proposed project would not include a backup diesel generator or other sources that would emit DPM or other toxic air contaminants. For these reasons, PEIR Mitigation Measure M-AQ-4 is not applicable to the proposed project.

Construction

The proposed project may require heavy-duty off-road diesel vehicles and equipment during the initial months of the anticipated 12-month construction period. PEIR Mitigation Measure M-AQ-6: Construction Emissions Minimization Plan for Criteria Air Pollutants, requires a development project that may exceed the standards for criteria air pollutants to undergo an analysis of its construction emissions. If, based on that analysis, the construction emissions may be significant, the project sponsor shall submit a Construction Emissions Minimization Plan for review and approval by the Planning Department. The proposed project does not exceed the BAAQMD's construction screening criterion for the "General Office Building" land use type. For this reason, PEIR Mitigation Measure M-AQ-6 is not applicable to the proposed project.

PEIR Mitigation Measure M-AQ-7: Construction Emissions Minimization Plan for Health Risks and Hazards, requires projects proposing construction in areas of poor air quality to maintain and operate construction equipment so as to minimize exhaust emissions of particulates and other pollutants. PEIR Mitigation Measure M-AQ-7 requires, among other things, diesel equipment to meet a minimum performance standard (all engines greater than 25 horsepower must meet Tier 2 emissions standards and be equipped with a Level 3-verified diesel emissions control strategy). The project site is located within the APEZ, and construction activities from the proposed project would result in DPM and other TACs from equipment exhaust, construction-related vehicular activity, and construction worker automobile trips. Construction would last approximately 12 months. As a result, the proposed project's temporary and variable construction activities would result in short-term emissions of DPM and other TACs that would add emissions to areas already adversely affected by poor air quality. Therefore, PEIR Mitigation Measure M-AQ-7 is applicable to the proposed project and is discussed under Project Mitigation Measure 3. Implementation of this mitigation measure would result in less-than-significant air quality impacts from construction vehicles and equipment.

Conclusion

As discussed above, the proposed project is required to comply with the provisions of Health Code Article 38 and the Construction Dust Control Ordinance. In addition, implementation of Project Mitigation Measure 3 would reduce construction-related air quality impacts to less-than-significant levels. For these reasons, the proposed project would not result in significant air quality impacts beyond those identified in the Western SoMa PEIR.

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

Western SoMa PEIR

The BAAQMD has prepared guidelines and methodologies for analyzing GHG emissions. These guidelines are consistent with CEQA Guidelines Sections 15064.4 and 15183.5, which address the analysis and determination of significant impacts from a proposed project's GHG emissions and allow for projects that are consistent with an adopted GHG reduction strategy to conclude that the project's GHG impact would be less than significant. San Francisco's *Strategies to Address Greenhouse Gas Emissions*[17] presents a comprehensive assessment of policies, programs, and ordinances that collectively represent San Francisco's GHG reduction strategy in compliance with the BAAQMD and CEQA guidelines. These GHG reduction actions have resulted in a 28 percent reduction in GHG emissions in 2015 compared to 1990 levels,[18] exceeding the year 2020 reduction goals outlined in BAAQMD's *2017 Clean Air Plan*,[19] Executive Order S-3-05,[20] and Assembly Bill 32 (also known as the Global Warming Solutions Act).[21, 22] In addition, San Francisco's GHG reduction goals are consistent with, or more aggressive than, the long-term goals

[17] San Francisco Planning Department, *Strategies to Address Greenhouse Gas Emissions in San Francisco*, 2017. Available at http://sf-planning.org/strategies-address-greenhouse-gas-emissions, accessed November 8, 2017.

[18] ICF International, *Technical Review of the 2012 Community-wide GHG Inventory for the City and County of San Francisco*, January 21, 2015. Available at http://sfenvironment.org/sites/default/files/fliers/files/icf_verificationmemo_2012sfecommunityinventory_2015-01-21.pdf, accessed March 16, 2015.

[19] Bay Area Air Quality Management District, *Clean Air Plan*, April 2017. Available at http://www.baaqmd.gov/plans-and-climate/air-quality-plans/current-plans, accessed September 29, 2017.

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

[21] California Legislative Information, Assembly Bill 32, September 27, 2006. Available at http://www.leginfo.ca.gov/pub/05-06/bill/asm/ab_0001-0050/ab_32_bill_20060927_chaptered.pdf, accessed March 3, 2016.

[22] Executive Order S-3-05, Assembly Bill 32, and the *Bay Area 2010 Clean Air Plan* set a target of reducing GHG emissions to below 1990 levels by year 2020.

established under Executive Orders S-3-05[23] and B-30-15,[24, 25] and Senate Bill 32.[26, 27] Therefore, projects that are consistent with San Francisco's GHG reduction strategy would not result in GHG emissions that would have a significant effect on the environment and would not conflict with state, regional, and local GHG reduction plans and regulations.

The Western SoMa PEIR determined that the goals and policies of the area plan were consistent with San Francisco's GHG reduction strategy and that implementation of the Western SoMa area plan policies would ensure that proposed project would be consistent with GHG plans and would result in less-than-significant impacts related to GHG emissions.

Proposed Project

The proposed project would include additional square footage within the same building envelope as the existing structure and increase the intensity of use of the project site. Therefore, the proposed project would contribute to annual long-term increases in GHGs as a result of office operations. The additional intensity resulting from project implementation would increase energy use, water use, wastewater treatment, and solid waste disposal demand. Construction activities would also result in temporary increases in GHG emissions.

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

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

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[23] Executive Order S-3-05 sets forth a series of target dates by which statewide emissions of GHGs need to be progressively reduced, as follows: by 2010, reduce GHG emissions to 2000 levels (approximately 457 million metric tons of carbon dioxide equivalent ($MTCO_2E$)); by 2020, reduce emissions to 1990 levels (approximately 427 million $MTCO_2E$); and by 2050, reduce emissions to 80 percent below 1990 levels (approximately 85 million $MTCO_2E$). Because of the differential heat absorption potential of various GHGs, GHG emissions are frequently measured in "carbon dioxide-equivalent," which present a weighted average based on each gas's heat absorption (or "global warming") potential.

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

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

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

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

The proposed project would be required to comply with the energy efficiency requirements of the City's Green Building Code and the City of San Francisco Stormwater Management Ordinance, which would promote energy and water efficiency, thereby reducing the proposed project's energy-related GHG emissions.[28]

The proposed project's waste-related emissions would be reduced through compliance with the City's Recycling and Composting Ordinance, Construction and Demolition Debris Recovery Ordinance, and construction and demolition debris recycling requirements. These regulations reduce the amount of materials sent to a landfill, reducing GHGs emitted by landfill operations. These regulations also promote reuse of materials, conserving their embodied energy[29] and reducing the energy required to produce new materials.

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

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

Wind

The Western SoMa PEIR determined that implementation of the Western SoMa Community Plan would have a potentially significant impact related to the alteration of wind in a manner that would substantially affect public areas. However, the PEIR determined that this impact could be reduced to a less-than-significant level with implementation of PEIR Mitigation Measure M-WS-1: Screening-Level Wind Analysis and Wind Testing, which would require a wind analysis for any new structures within the Plan Area that are 80 feet or taller.

Based upon experience of the Planning Department in reviewing wind analyses and expert opinion on other projects, it is generally the case that projects less than 80 feet in height would not have the potential to generate significant wind impacts. The proposed project height of 38'-6"would be similar in height to existing buildings in the area. The project would not contribute to the significant wind impact identified in the Western SoMa PEIR, because the proposed building would not exceed 80 feet in height and would not

[28] Compliance with water conservation measures reduces the energy (and GHG emissions) required to convey, pump, and treat water required for the project.

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

rise substantially above nearby buildings. Therefore, PEIR Mitigation Measure M-WS-1 is not applicable to the proposed project. For these reasons, the proposed project is not anticipated to cause significant wind impacts beyond those identified in the Western SoMa PEIR.

Shadow

Planning Code Section 295 generally prohibits new structures above 40 feet in height that would cast additional shadows on open space that is under the jurisdiction of the San Francisco Recreation and Park Commission between one hour after sunrise and one hour before sunset, at any time of the year, unless the shadow would not result in a significant adverse effect on the use of the open space. The Western SoMa PEIR determined that implementation of the *Western SoMa Community Plan* would have a significant and unavoidable impact related to the creation of new shadows in a manner that would substantially affect outdoor recreation facilities or other public areas. No mitigation measures were identified in the PEIR.

The proposed project would increase the height of the existing structure; however, the building would be less than 40-feet and set back from the frontage of Harrison Street, and therefore not substantially increase shade portions of nearby streets, sidewalks, or private properties in the project vicinity. Shadows on streets and sidewalks would be transitory in nature, would not exceed levels commonly expected in urban areas, and would be considered a less-than-significant impact. Although occupants of nearby properties may regard the increase in shadow as undesirable, the limited increase in shading of private properties as a result of the proposed project would not be considered a significant.

For these reasons, the project would not contribute to the significant shadow impact identified in the Western SoMa PEIR.

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

The Western SoMa PEIR determined that implementation of the *Western SoMa Community Plan* would not result in substantial or accelerated deterioration of existing recreational resources or require the construction or expansion of recreational facilities that may have an adverse effect on the environment. No mitigation measures were identified in the PEIR.

As the proposed project would not degrade recreational facilities and is consistent with the development density established under the *Western SoMa Community Plan*, there would be no additional impacts on recreation beyond those analyzed in the Western SoMa PEIR.

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

The Western SoMa PEIR determined that the anticipated increase in population as a result of Plan implementation would not result in a significant impact on the provision of water, wastewater collection and treatment, and solid waste collection and disposal. No mitigation measures were identified in the PEIR.

As the proposed project is consistent with the development density established under the *Western SoMa Community Plan*, there would be no additional impacts on utilities and service systems beyond those analyzed in the Western SoMa PEIR.

Topics:	Significant Impact Peculiar to Project or Project Site	Significant Impact not Identified in PEIR	Significant Impact due to Substantial New Information	No Significant Impact not Previously Identified in PEIR
11. PUBLIC SERVICES—Would the project:				
a) Result in substantial adverse physical impacts associated with the provision of, or the need for, new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any public services such as fire protection, police protection, schools, parks, or other services?	☐	☐	☐	☒

The Western SoMa PEIR determined that the anticipated increase in population and development as a result of Plan implementation would not result in a significant impact on public services, including fire protection, police protection, and public schools. No mitigation measures were identified in the PEIR.

As the proposed project is consistent with the development density established under the *Western SoMa Community Plan*, there would be no additional impacts on public services beyond those analyzed in the Western SoMa PEIR.

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

Topics:	Significant Impact Peculiar to Project or Project Site	Significant Impact not Identified in PEIR	Significant Impact due to Substantial New Information	No Significant Impact not Previously Identified in PEIR
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

As discussed in the Western SoMa PEIR, the Plan Area is almost fully developed with structures, parking lots, and other urban improvements including streets and sidewalks. The majority of the Plan Area consists of structures associated with past or present industrial uses.

Because future development projects under the *Western SoMa Community Plan* would largely consist of new construction in heavily built-out former industrial neighborhoods, loss of vegetation or disturbance of wildlife other than common urban species would be minimal. Therefore, the Western SoMa PEIR concluded that implementation of the *Western SoMa Community Plan* would not result in any significant effects related to riparian habitat, wetlands, movement of migratory species, local policies or ordinances protecting biological resources, or habitat conservation plans.

The Western SoMa PEIR determined that the *Western SoMa Community Plan* would result in significant but mitigable impacts on special-status birds and bats that may be nesting in trees or roosting in the building. There are four existing trees on the Harrison Street frontage of the project site that would be retained. The proposed project does not include substantial demolition. The proposed project is consistent with the development established under the Western SoMa Community Plan and there would be no additional impacts on biological resources beyond those analyzed in the Western SoMa PEIR. The proposed project would not result in the removal of on-site trees or include demolition of the existing building.

Topics:	Significant Impact Peculiar to Project or Project Site	Significant Impact not Identified in PEIR	Significant Impact due to Substantial New Information	No Significant Impact not Previously Identified in PEIR
13. GEOLOGY AND SOILS—Would the project:				
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:	☐	☐	☐	☒
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? (Refer to Division of Mines and Geology Special Publication 42.)	☐	☐	☐	☒
ii) Strong seismic ground shaking?	☐	☐	☐	☒
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☐	☒
iv) Landslides?	☐	☐	☐	☒
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☐	☒

Topics:	Significant Impact Peculiar to Project or Project Site	Significant Impact not Identified in PEIR	Significant Impact due to Substantial New Information	No Significant Impact not Previously Identified in PEIR
c) Be located on geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	☐	☐	☒
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code, creating substantial risks to life or property?	☐	☐	☐	☒
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	☒
f) Change substantially the topography or any unique geologic or physical features of the site?	☐	☐	☐	☒

The Western SoMa PEIR concluded that implementation of the *Western SoMa Community Plan* would indirectly increase the population and development that would be subject to geologic hazards, including earthquakes, seismically induced ground shaking, liquefaction, and landslides. The PEIR also noted that new development is generally safer than comparable older development due to improvements in building codes and construction techniques. Compliance with applicable codes and recommendations made in project-specific geotechnical analyses would not eliminate earthquake risk but would reduce potential impacts to an acceptable level given the seismically active characteristics of the San Francisco Bay Area. The PEIR concluded that implementation of the *Western SoMa Community Plan* would not result in significant impacts related to geologic hazards. No mitigation measures were identified in the PEIR.

A geotechnical investigation was conducted on February 8, 2016 to assess the geologic conditions underlying the project site and provided recommendations related to the proposed project's design and construction.[30] The findings and recommendations are presented in a geotechnical report and summarized below. The geotechnical investigation included cone penetration tests, hand auger boring, and laboratory testing of the samples. Based on the boring tests, the site is underlain with Beach and Dune Sand. Groundwater was encountered approximately 3 feet bgs.

There are no known active earthquake faults that run underneath the project site or in the project vicinity. The closest active fault to the project site is the San Andreas Fault, which is about seven miles to the southwest of the site. The project site is not in a landslide hazard zone or a liquefaction hazard zone.

The geotechnical report included recommendations related to site preparation and grading, seismic design, foundations, footings, underpinning, seismic design and additional construction considerations. The proposed building improvements can be supported by conventional spread footings connected to a proposed new mat foundation bearing on existing loose sand at the site, cyclic densification by permeating grouting of the loose sand, or supporting the entire building on deep foundations.

[30] Rockridge Geotechnical. *Geotechnical Investigation Proposed Renovation & Seismic Strengthening, 1170 Harrison Street, San Francisco, California*. February 8, 2016.

The proposed project is required to comply with the San Francisco Building Code (Building Code) which ensures the safety of all new construction in San Francisco. The Department of Building Inspection (DBI) would review the project-specific geotechnical report during its review of the building permit application for the proposed project. In addition, the DBI may require additional site-specific soils report(s) as needed. Implementation of the recommendations in the geotechnical report, in combination with the requirement for a geotechnical report and the review of the building permit application pursuant to the DBI's implementation of the Building Code would minimize the risk of loss, injury, or death due to seismic or other geologic hazards.

For these reasons, the proposed project would not result in significant impacts related to geology and soils beyond those identified in the Western SoMa PEIR, and no mitigation measures are necessary.

Topics:	*Significant Impact Peculiar to Project or Project Site*	*Significant Impact not Identified in PEIR*	*Significant Impact due to Substantial New Information*	*No Significant Impact not Previously Identified in PEIR*
14. HYDROLOGY AND WATER QUALITY— Would the project:				
a) Violate any water quality standards or waste discharge requirements?	☐	☐	☐	☒
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	☐	☐	☐	☒
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner that would result in substantial erosion or siltation on- or off-site?	☐	☐	☐	☒
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site?	☐	☐	☐	☒
e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	☐	☐	☐	☒
f) Otherwise substantially degrade water quality?	☐	☐	☐	☒
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other authoritative flood hazard delineation map?	☐	☐	☐	☒
h) Place within a 100-year flood hazard area structures that would impede or redirect flood flows?	☐	☐	☐	☒
i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	☐	☐	☐	☒

Topics:	Significant Impact Peculiar to Project or Project Site	Significant Impact not Identified in PEIR	Significant Impact due to Substantial New Information	No Significant Impact not Previously Identified in PEIR
j) Expose people or structures to a significant risk of loss, injury or death involving inundation by seiche, tsunami, or mudflow?	☐	☐	☐	☒

The Western SoMa PEIR determined that the anticipated increase in population and development as a result of Plan implementation would not result in a significant impact related to hydrology and water quality, including the combined sewer system and the potential for combined sewer outflows. No mitigation measures were identified in the PEIR.

The entire project site is covered by impervious surfaces, and the existing building/proposed project's footprint would cover the entire site. As a result, the proposed project would not increase the amount of impervious surface area on the project site or increase the amount of runoff and drainage from the project site. In accordance with the City's Stormwater Management Ordinance (Ordinance No. 83-10, effective May 22, 2010), the proposed project is subject to and would comply with the Stormwater Design Guidelines, incorporating Low Impact Design approaches and stormwater management systems into the project. Therefore, the proposed project would not adversely affect runoff and drainage.

For these reasons, the proposed project would not result in any significant impacts related to hydrology and water quality beyond those identified in the Western SoMa PEIR.

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

Topics:	Significant Impact Peculiar to Project or Project Site	Significant Impact not Identified in PEIR	Significant Impact due to Substantial New Information	No Significant Impact not Previously Identified in PEIR
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒

The Western SoMa PEIR identified less-than-significant impacts related to the routine transport, use, or disposal of hazardous material; the potential for the implementation of the *Western SoMa Community Plan* or subsequent development projects within the Plan Area to interfere with an adopted emergency response plan; and the potential for subsequent development projects within the Plan Area to expose people or structures to a significant risk with respect to fires.

Hazardous Building Materials

The building consists of two combined structures. The east portion of the building was constructed in 1912 and the west portion of the building was constructed in 1929. The sections were unified in 1929. The structures were built before the 1970s, and may contain hazardous building materials such as polychlorinated biphenyls (PCBs), mercury, asbestos, and lead-based paint may be present in the building.

The proposed renovation and construction activities could expose workers or the community to hazardous building materials. The proposed project involves renovations and new construction; therefore, PEIR Mitigation Measure M-HZ-2: Hazardous Building Materials Abatement is applicable to the proposed project. PEIR Mitigation Measure M-HZ-2 requires any equipment containing PCBs or mercury, such as fluorescent light ballasts and fluorescent light tube fixtures, to be removed and properly disposed of in accordance with applicable federal, state, and local laws prior to the start of demolition and/or renovation of an existing structure. Implementation of this mitigation measure would reduce potential impacts related to hazardous building materials to less-than-significant levels. PEIR Mitigation Measure M-HZ-2 is identified as Project Mitigation Measure 4.

For these reasons, the proposed project would not result in significant impacts related to hazardous building materials beyond those identified in the Western SoMa PEIR.

Handling of Potentially Contaminated Soils

The Western SoMa PEIR identified potentially significant impacts related to exposing the public or the environment to unacceptable levels of hazardous materials as a result of subsequent development projects within the Plan Area. The PEIR determined that Mitigation Measure M-HZ-3: Site Assessment and Corrective Action, would reduce these impacts to less-than-significant levels.

Subsequently, the San Francisco Board of Supervisors amended Health Code Article 22A (also known as the Maher Ordinance), which is administered and overseen by the Department of Public Health (DPH). Amendments to the Maher Ordinance became effective August 24, 2013 and require that sponsors for projects that disturb more than 50 cubic yards of soil retain the services of a qualified professional to prepare a Phase I Environmental Site Assessment (ESA) that meets the requirements of Health Code

Section 22.A.6. PEIR Mitigation Measure M-HZ-3, related to contaminated soil and groundwater, is therefore superseded by the Maher Ordinance and is not applicable to the proposed project.

The project site is located in a Maher Area, meaning that it is known or suspected to contain contaminated soil and/or groundwater.[31] The proposed project would require excavation to a depth of six feet below grade and the disturbance of more than 50 cubic yards of soil. In compliance with the Maher Ordinance, the project sponsor has submitted a Maher Ordinance Application and a Phase I to the DPH.[32] The Maher application submittal included the Phase I, Geotechnical Report, and Drawings and Elevations.

A Phase I ESA was prepared to assess the potential for site contamination. The Phase I ESA found evidence indicating that former industrial activities on the project site have contributed contamination to the soil or groundwater underlying the site.[33] The subsurface of the site has been impacted with metals, acid, and chlorinated solvents. Based on the conclusions and recommendation of the Phase I ESA a Phase II ESA was prepared. The Phase II concluded that soil and groundwater at the subject site has been impacted by VOCs and metals. The lateral extent of elevated lead levels in site soil extends over most of the subject property area. Due to potential soil and groundwater contamination a Site Mitigation Plan (SMP) is required to establish procedures and protocols to reduce or eliminate exposure risk to human health from soils containing lead and other metals exceeding hazardous waste thresholds during site development activities.[34] The SMP provides a decision framework to manage contamination at the site.

Pursuant to compliance with the Maher Ordinance, the proposed project would not result in significant impacts related to hazardous soil and/or groundwater beyond those identified in the Western SoMa PEIR.

As discussed above, implementation of Project Mitigation Measure 7 and compliance with all applicable federal, state, and local regulations would ensure that the proposed project would not result in significant impacts related to hazards or hazardous materials beyond those identified in the Western SoMa PEIR.

Topics:	*Significant Impact Peculiar to Project or Project Site*	*Significant Impact not Identified in PEIR*	*Significant Impact due to Substantial New Information*	*No Significant Impact not Previously Identified in PEIR*
16. MINERAL AND ENERGY RESOURCES— Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☒

[31] San Francisco Planning Department, GIS database Maher Map layer, accessed October 13, 2017.

[32] Buddha Properties, LLC. *Maher Ordinance Application*. Available at the San Francisco Planning Department, 1650 Mission Street 4th floor, San Francisco Ca. 94103.

[33] Eras Environmental, Inc. *Phase I Environmental Site Assessment, 1170-1180, 1184 and 1188 Harrison Street, San Francisco, California 94103*. October 27, 2017

[34] City and County of San Francisco, Department of Environmental Health. *Phase II Report Approval and Site Mitigation Plan Request, Proposed Renovation and Seismic Strengthening 1170 Harrison Street, San Francisco Ca. 94103*. July 20, 2018.

Topics:	Significant Impact Peculiar to Project or Project Site	Significant Impact not Identified in PEIR	Significant Impact due to Substantial New Information	No Significant Impact not Previously Identified in PEIR
c) Encourage activities which result in the use of large amounts of fuel, water, or energy, or use these in a wasteful manner?	☐	☐	☐	☒

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

As the proposed project is consistent with the development density established under the *Western SoMa Community Plan*, there would be no additional impacts on mineral and energy resources beyond those analyzed in the Western SoMa PEIR.

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

The Western SoMa PEIR determined that no agriculture or forest resources exist in the Plan Area; therefore, implementation of the the *Western SoMa Community Plan* would have no effect on agriculture and forest resources. No mitigation measures were identified in the PEIR.

As the proposed project is consistent with the development density established under the *Western SoMa Community Plan*, there would be no additional impacts on agriculture and forest resources beyond those analyzed in the Western SoMa PEIR.

MITIGATION MEASURES

Project Mitigation Measure 1 – Procedures for Accidental Discovery of Archeological Resources (Implementing Western SoMa PEIR Mitigation Measure M-CP-4b)

The following mitigation measure is required to avoid any potential adverse effect from the proposed project on accidentally discovered buried or submerged historical resources as defined in *CEQA Guidelines* Section 15064.5(a) and (c). The project sponsor shall distribute the Planning Department archeological resource "ALERT" sheet to the project prime contractor; to any project subcontractor (including excavation, grading, foundations, etc. firms); or utilities firm involved in soils-disturbing activities within the project site. Prior to any soils-disturbing activities being undertaken, each contractor is responsible for ensuring that the "ALERT" sheet is circulated to all field personnel, including machine operators, field crew, supervisory personnel, etc. The project sponsor shall provide the Environmental Review Officer (ERO) with a signed affidavit from the responsible parties (prime contractor, subcontractor(s), and utilities firm) to the ERO confirming that all field personnel have received copies of the Alert Sheet.

Should any indication of an archeological resource be encountered during any soils-disturbing activity of the project, the project Head Foreman and/or project sponsor shall immediately notify the ERO and shall immediately suspend any soils-disturbing activities in the vicinity of the discovery until the ERO has determined what additional measures should be undertaken.

If the ERO determines that an archeological resource may be present within the project site, the project sponsor shall retain the services of an archeological consultant from the pool of qualified archeological consultants maintained by the Planning Department archeologist. The archeological consultant shall advise the ERO as to whether the discovery is an archeological resource retains sufficient integrity and is of potential scientific/historical/cultural significance. If an archeological resource is present, the archeological consultant shall identify and evaluate the archeological resource. The archeological consultant shall make a recommendation as to what action, if any, is warranted. Based on this information, the ERO may require, if warranted, specific additional measures to be implemented by the project sponsor.

Measures might include: preservation in situ of the archeological resource; an archeological monitoring program; or an archeological testing program. If an archeological monitoring program or archeological testing program is required, it shall be consistent with the Environmental Planning Division guidelines for such programs. The ERO may also require that the project sponsor immediately implement a site security program if the archeological resource is at risk from vandalism, looting, or other damaging actions.

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

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

Project Mitigation Measure 2 – Protect Historical Resources from Adjacent Construction Activities (Implementing Western SoMa PEIR Mitigation Measure M-CP-7a)

The project sponsor of a development project in the Plan Area and on the Adjacent Parcels shall consult with Planning Department environmental planning/preservation staff to determine whether adjacent or nearby buildings constitute historical resources that could be adversely affected by construction-generated vibration. For purposes of this measure, nearby historic buildings shall include those within 100 feet of a construction site if pile driving would be used in a subsequent development project; otherwise, it shall include historic buildings within 25 feet if heavy equipment would be used on the subsequent development project. (No measures need be applied if no heavy equipment would be employed.) If one or more historical resources is identified that could be adversely affected, the project sponsor shall incorporate into construction specifications for the proposed project a requirement that the construction contractor(s) use all feasible means to avoid damage to adjacent and nearby historic buildings. Such methods may include maintaining a safe distance between the construction site and the historic buildings (as identified by the Planning Department preservation staff), using construction techniques that reduce vibration, appropriate excavation shoring methods to prevent movement of adjacent structures, and providing adequate security to minimize risks of vandalism and fire.

Project Mitigation Measure 3 – Construction Monitoring Program for Historical Resources. (Implementing Western SoMa PEIR Mitigation Measure M-CP-7b)

The project sponsor shall undertake a monitoring program to minimize damage to adjacent historic buildings and to ensure that any such damage is documented and repaired. The monitoring program, which shall apply within 100 feet where pile driving would be used and within 25 feet otherwise, shall include the following components. Prior to the start of any ground-disturbing activity, the project sponsor shall engage a historic architect or qualified historic preservation professional to undertake a preconstruction survey of historical resource(s) identified by the Planning Department within 125 feet of planned construction to document and photograph the buildings' existing conditions. Based on the construction and condition of the resource(s), the consultant shall also establish a maximum vibration level that shall not be exceeded at each building, based on existing condition, character-defining features, soils conditions, and anticipated construction practices (a common standard is 0.2 inch per second, peak particle velocity). To ensure that vibration levels do not exceed the established standard, the project sponsor shall monitor vibration levels at each structure and shall prohibit vibratory construction activities that generate vibration levels in excess of the standard. Should vibration levels be observed in excess of the standard, construction shall be halted and alternative techniques put in practice, to the extent feasible. The consultant shall conduct regular periodic inspections of each building during ground-disturbing activity on the project

site. Should damage to either building occur, the building(s) shall be remediated to its pre-construction condition at the conclusion of ground-disturbing activity on the site.

Project Mitigation Measure 4 – General Construction Noise Control Measures (Implementing Western SoMa PEIR Mitigation Measure M-NO-2a)

To ensure that project noise from construction activities is minimized to the maximum extent feasible, the project sponsor shall undertake the following:

- The project sponsor shall require the general contractor to ensure that equipment and trucks used for project construction use the best available noise control techniques (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures and acoustically attenuating shields or shrouds, wherever feasible).
- The project sponsor shall require the general contractor to locate stationary noise sources (such as compressors) as far from adjacent or nearby sensitive receptors as possible, to muffle such noise sources, and to construct barriers around such sources and/or the construction site, which could reduce construction noise by as much as 5 dBA. To further reduce noise, the contractor shall locate stationary equipment in pit areas or excavated areas, if feasible.
- The project sponsor shall require the general contractor to use impact tools (e.g., jackhammers, pavement breakers, and rock drills) that are hydraulically or electrically powered wherever possible to avoid noise associated with compressed air exhaust from pneumatically powered tools. Where use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust shall be used, along with external noise jackets on the tools, which could reduce noise levels by as much as 10 dBA.
- The project sponsor shall include noise control requirements in specifications provided to construction contractors. Such requirements could include, but not be limited to: performing all work in a manner that minimizes noise to the extent feasible; undertaking the most noisy activities during times of least disturbance to surrounding residents and occupants, as feasible; and selecting haul routes that avoid residential buildings inasmuch as such routes are otherwise feasible.
- Prior to the issuance of each building permit, along with the submission of construction documents, the project sponsor shall submit to the San Francisco Planning Department and Department of Building Inspection (DBI) a list of measures to respond to and track complaints pertaining to construction noise. These measures shall include: (1) a procedure and phone numbers for notifying DBI, the Department of Public Health, and the Police Department (during regular construction hours and off-hours); (2) a sign posted on-site describing noise complaint procedures and a complaint hotline number that shall be answered at all times during construction; (3) designation of an on-site construction complaint and enforcement manager for the project; and (4) notification of neighboring residents and non-residential building managers within 300 feet of the project construction area at least 30 days in advance of extreme noise-generating activities (defined as activities generating noise levels of 90 dBA or greater) about the estimated duration of the activity.

Project Mitigation Measure 5 – Construction Emissions Minimization Plan for Health Risks and Hazards (Implementing Western SoMa PEIR Mitigation Measure M-AQ-7)

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

A. *Engine Requirements.*

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

B. *Waivers.*

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

Table – Off-Road Equipment Compliance Step-down Schedule

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

3	Tier 2	Alternative Fuel*

How to use the table: If the ERO determines that the equipment requirements cannot be met, then the project sponsor would need to meet Compliance Alternative 1. If the ERO determines that the Contractor cannot supply off-road equipment meeting Compliance Alternative 1, then the Contractor must meet Compliance Alternative 2. If the ERO determines that the Contractor cannot supply off-road equipment meeting Compliance Alternative 2, then the Contractor must meet Compliance Alternative 3. Alternative fuels are not a VDECS.

C. *Construction Emissions Minimization Plan.* Before starting on-site construction activities, the Contractor shall submit a Construction Emissions Minimization Plan (Plan) to the ERO for review and approval. The Plan shall state, in reasonable detail, how the Contractor will meet the requirements of Section A.

1. The Plan shall include estimates of the construction timeline by phase, with a description of each piece of off-road equipment required for every construction phase. The description may include, but is not limited to: equipment type, equipment manufacturer, equipment identification number, engine model year, engine certification (Tier rating), horsepower, engine serial number, and expected fuel usage and hours of operation. For VDECS installed, the description may include: technology type, serial number, make, model, manufacturer, ARB verification number level, and installation date and hour meter reading on installation date. For off-road equipment using alternative fuels, the description shall also specify the type of alternative fuel being used.

2. The ERO shall ensure that all applicable requirements of the Plan have been incorporated into the contract specifications. The Plan shall include a certification statement that the Contractor agrees to comply fully with the Plan.

3. The Contractor shall make the Plan available to the public for review on-site during working hours. The Contractor shall post at the construction site a legible and visible sign summarizing the Plan. The sign shall also state that the public may ask to inspect the Plan for the project at any time during working hours and shall explain how to request to inspect the Plan. The Contractor shall post at least one copy of the sign in a visible location on each side of the construction site facing a public right-of-way.

D. *Monitoring.* After start of construction activities, the Contractor shall submit quarterly reports to the ERO documenting compliance with the Plan. After completion of construction activities and prior to receiving a final certificate of occupancy, the project sponsor shall submit to the ERO a final report summarizing construction activities, including the start and end dates and duration of each construction phase, and the specific information required in the Plan.

Project Mitigation Measure 6 – Hazardous Building Materials Abatement (Implementing Western SoMa PEIR Mitigation Measure M-HZ-2)

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