



SAN FRANCISCO PLANNING DEPARTMENT

Community Plan Exemption Checklist

Case No.: 2015-006425ENV
Project Address: 755 Ocean Avenue (Lick-Wilmerding High School)
Zoning: RH-1 (Residential – House, Single Family) Use District
40-X Height and Bulk Districts
Block/Lot: 6948/023
Lot Size: 153,294 square feet
Plan Area: Balboa Park Station Area Plan
Project Sponsor: Joel Roos, Pacific Union Development Company, (415) 929-6708
Staff Contact: Kansai Uchida, (415) 575-9048, kansai.uchida@sfgov.org

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PROJECT DESCRIPTION

The project site at 755 Ocean Avenue is located in San Francisco's Ingleside neighborhood. The approximately 153,294-square-foot site is located on the block bounded by Ocean Avenue to the north, Howth Street to the west, Geneva Avenue to the south, and Interstate 280 to the east (see **Figure 1, Project Location**). Interstate 280 is a nine-lane depressed freeway, with the nearest ramps located across Ocean Avenue from the project site. The City College of San Francisco is located directly across Ocean Avenue to the north, and the Balboa Park Bay Area Rapid Transit (BART) station and Muni Green Light Rail Yard are located directly across Interstate 280 to the east. Balboa Park is located northeast of the project site, across Interstate 280. The Muni K-Ingleside light rail line runs adjacent to the project site along Ocean Avenue, and several Muni bus lines run adjacent the project site on both Ocean and Geneva Avenues. A bus stop served by the 29-Sunset and 49-Van Ness/Mission lines is located directly in front of the project site on Ocean Avenue.

The project site currently contains five one- and two-story buildings, constructed in phases from 1956 to 2003, which house a 490-student private high school (Lick-Wilmerding High School). The two-story building fronting Ocean Avenue, the subject of the proposed project, was built in 1956, measures 27 feet in height (measured from the eastern end of the site), and contains 46,200 square feet (sf) of classroom and administrative office space (see **Figure 2, Site Plan; Figure 3, Existing Floor Plans; Figure 4, Existing Sections; and Figure 5 Existing Elevations**). Two curb cuts are present at the eastern end of the site (one on Ocean Avenue and one on Geneva Avenue), connected by a 56-space surface parking lot bordering the eastern boundary of the property. The school currently has 14 bicycle parking spaces on site. A passenger loading zone is present along the site's Ocean Avenue frontage, and is used for school pick-up and drop-off. The loading zone can currently accommodate three vehicles, and would be lengthened along Ocean Avenue and Howth Street to accommodate 13 vehicles. A total of 16 on-street parking spaces would be removed to accommodate the loading zone extension. The loading zone would primarily be used at the beginning and end of the scheduled school hours, which are currently 8:30 a.m. to 3:20 p.m.

The proposed project would renovate the two-story building fronting Ocean Avenue and add a third story (see **Figure 6, Proposed Floor Plans; Figure 7, Proposed Sections**). The expansion would add six classrooms to the high school, allowing enrollment to increase by 160 students, to a new total of 650. The

building's square footage would increase by 16,209 sf, to a new total of 62,409 sf. The building's height would increase by 13 feet, to a new total of 40 feet, with some rooftop mechanical equipment reaching up to 50 feet above street level. The proposed project would add 30 on-site bicycle spaces, for a new total of 44 spaces. No vehicle parking spaces would be added or removed. A new building entrance would be constructed at the southeast corner of Ocean Avenue and Howth Street. A sidewalk bulb-out and new passenger loading zones would be created along the project site's Ocean Avenue and Howth Street frontages. An enclosed walkway would be added between the subject building and the adjacent laboratory and theater building. A 10-foot tall sound wall would be constructed along the western side of the project site, fronting Interstate 280.

Construction activities would last approximately 16 months, and would require approximately 1,515 cubic yards of excavation, with soil disturbance reaching depths of up to 14 feet below existing grade. Structural work to improve the building's seismic safety would also be performed. The other buildings on the site would remain in use throughout the construction period and after the proposed project is completed. Up to 15 temporary portable classrooms, each measuring 480 sf, would be placed in the on-site parking lot to allow classes normally held in the subject building during the construction period. A total of 56 alternative off-street parking spaces would be temporarily provided at up to three nearby existing surface parking lots at 355 Ocean Avenue, 66 Geneva Avenue, and 50 Phelan Avenue, all of which are within walking distance (approximately one-quarter mile) of the project site. The portable classroom buildings would be removed upon completion of construction activities.

The proposed 755 Ocean Avenue project would require the following approvals:

Actions by the Planning Commission

- Conditional Use Authorization

Actions by other City Departments

- Building Permit Approval by the Department of Building Inspection (DBI)

Figure 1 – Project Location

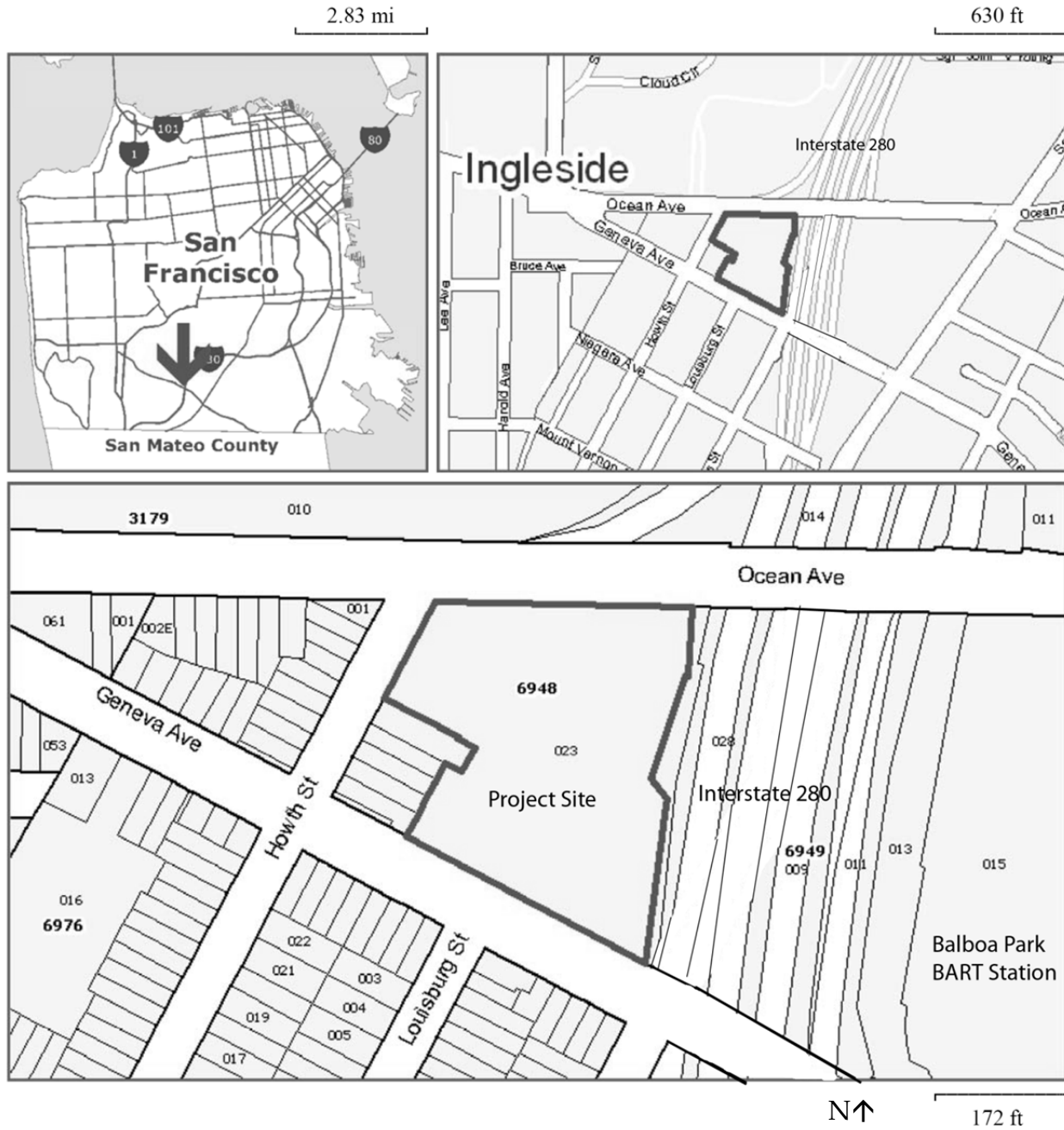


Figure 2 – Site Plan

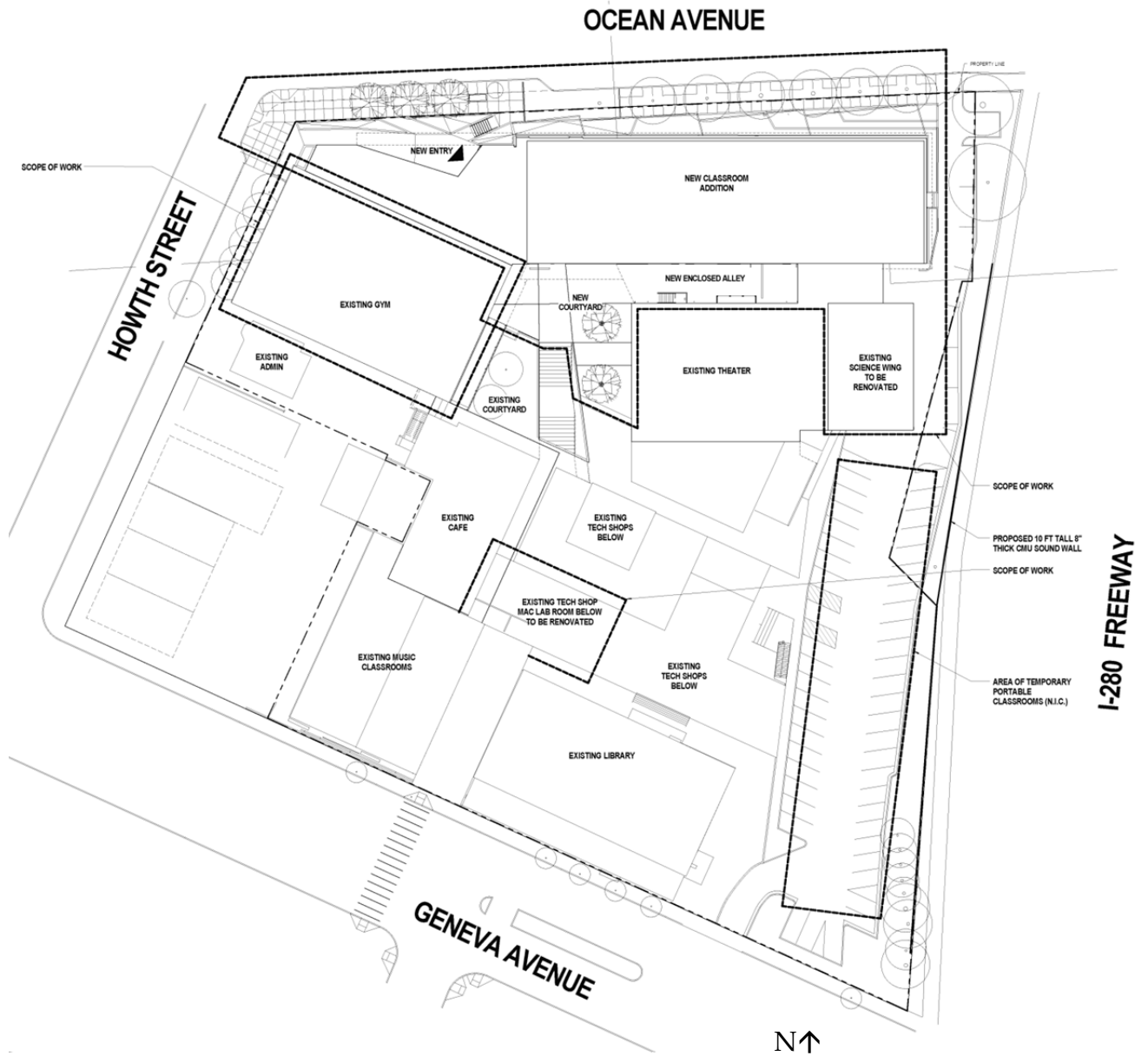


Figure 4 – Existing Section (Facing South)

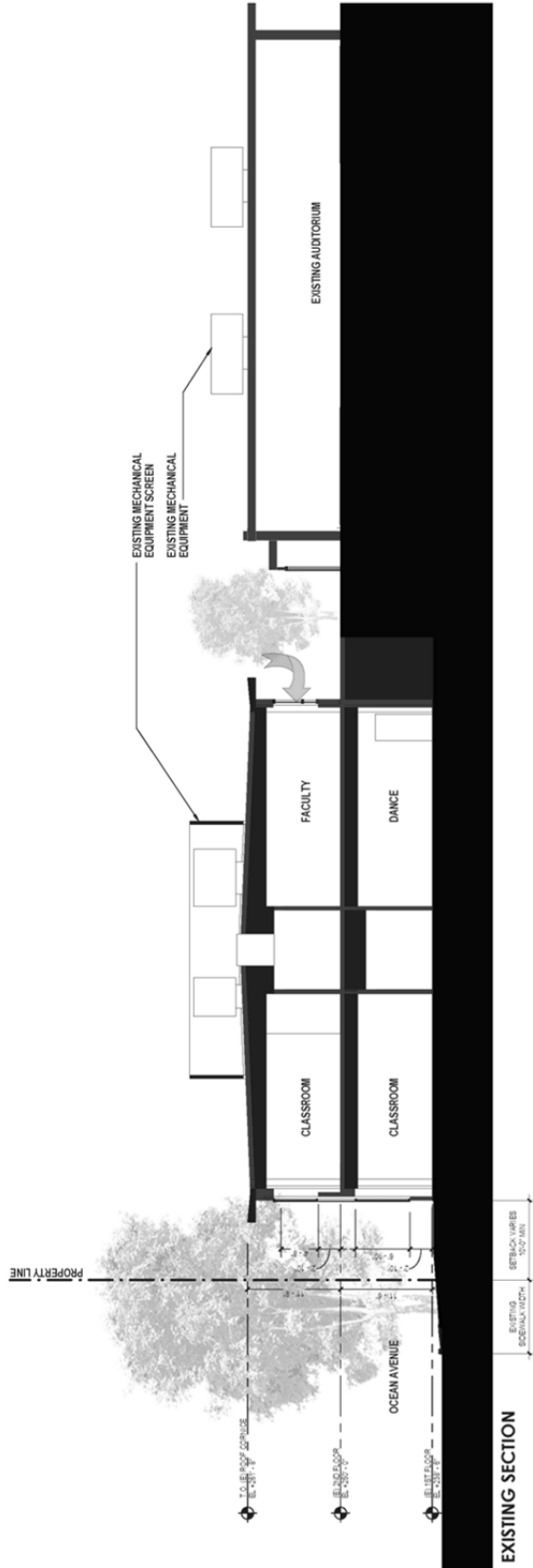


Figure 5 – Existing Elevation (Photo – North Side/Ocean Avenue)



Figure 6a – Proposed Floor Plans (Level 1)



Figure 6b – Proposed Floor Plans (Level 2)

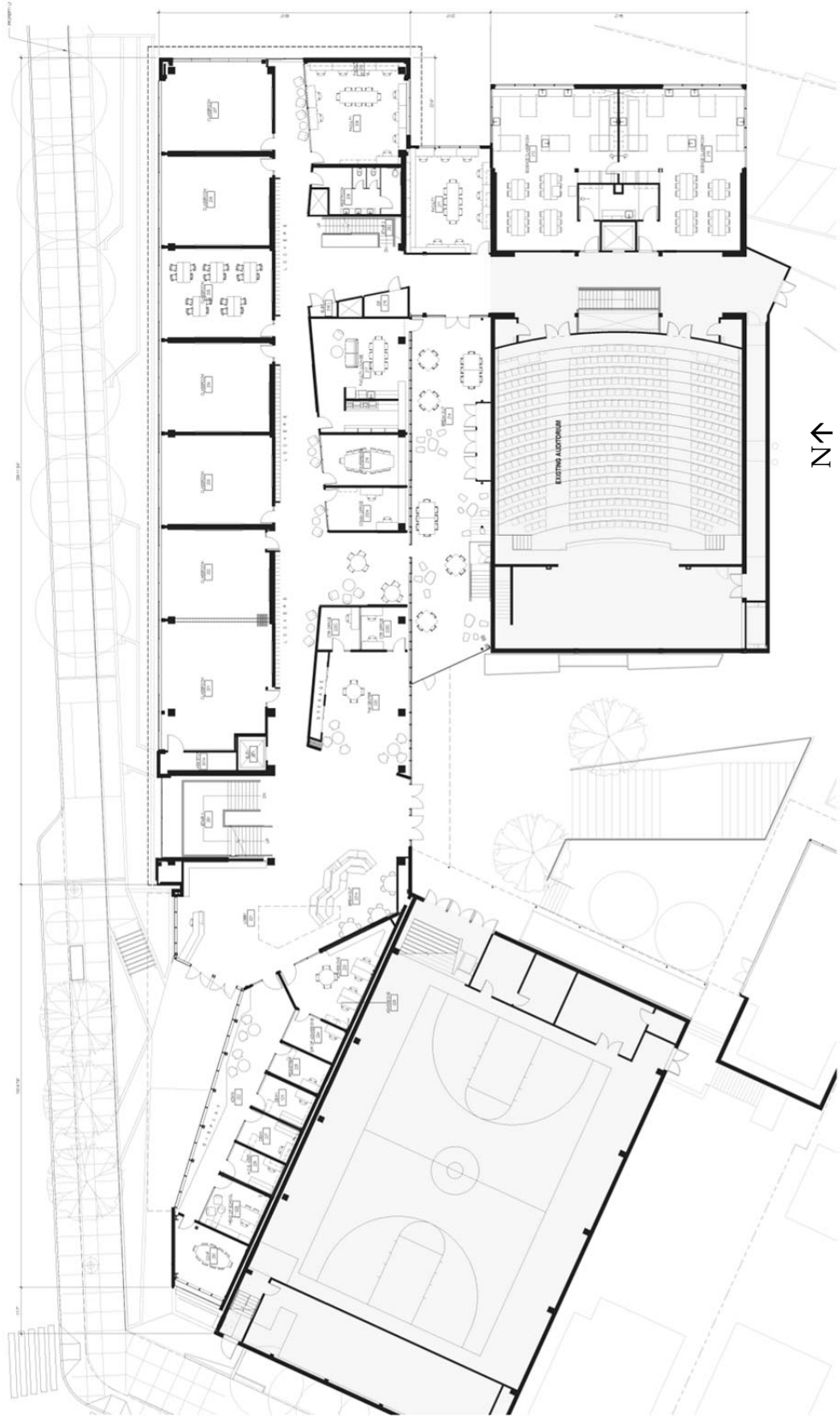


Figure 6c – Proposed Floor Plans (Level 3)

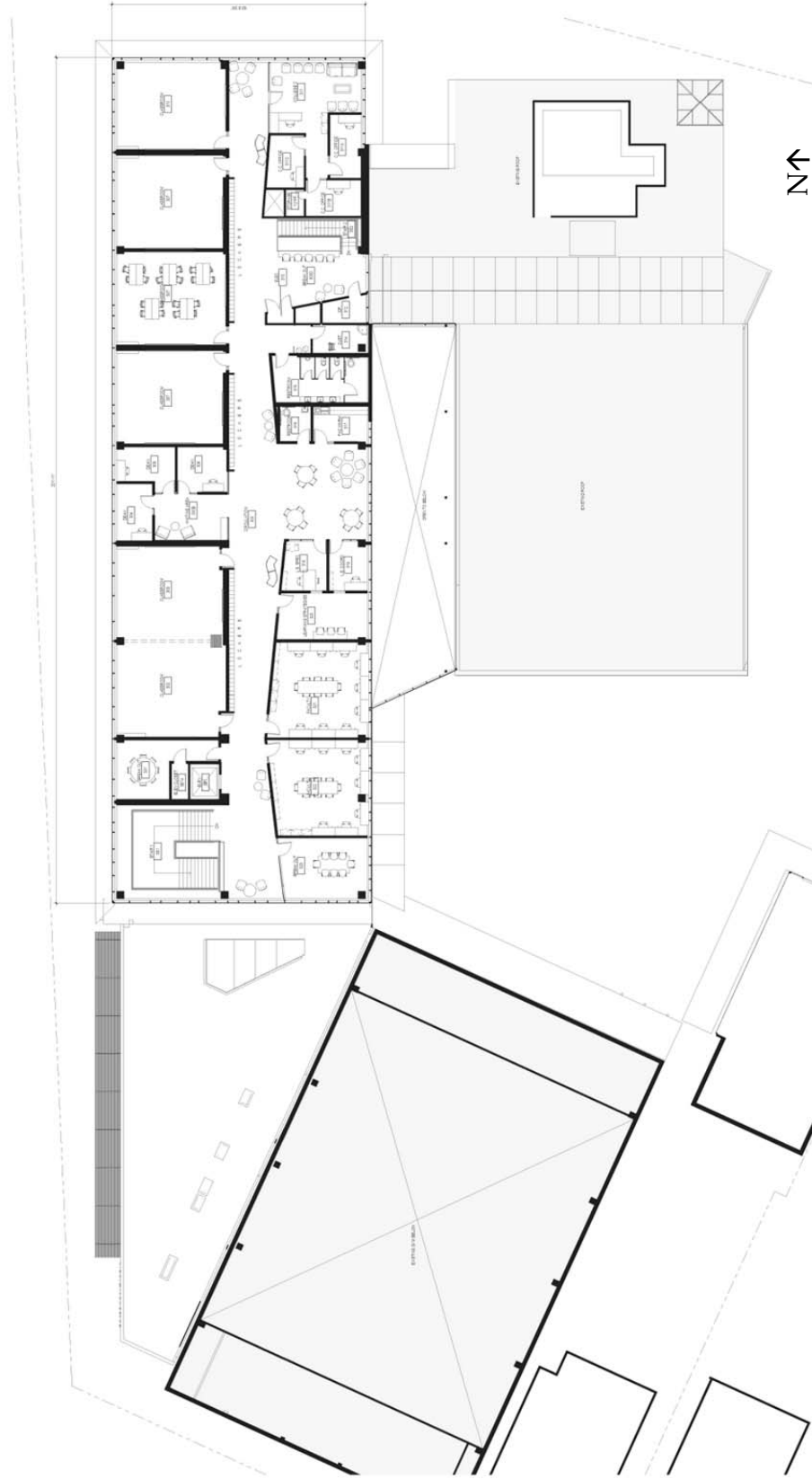


Figure 7c – Proposed Elevations (Facing East - Partial)

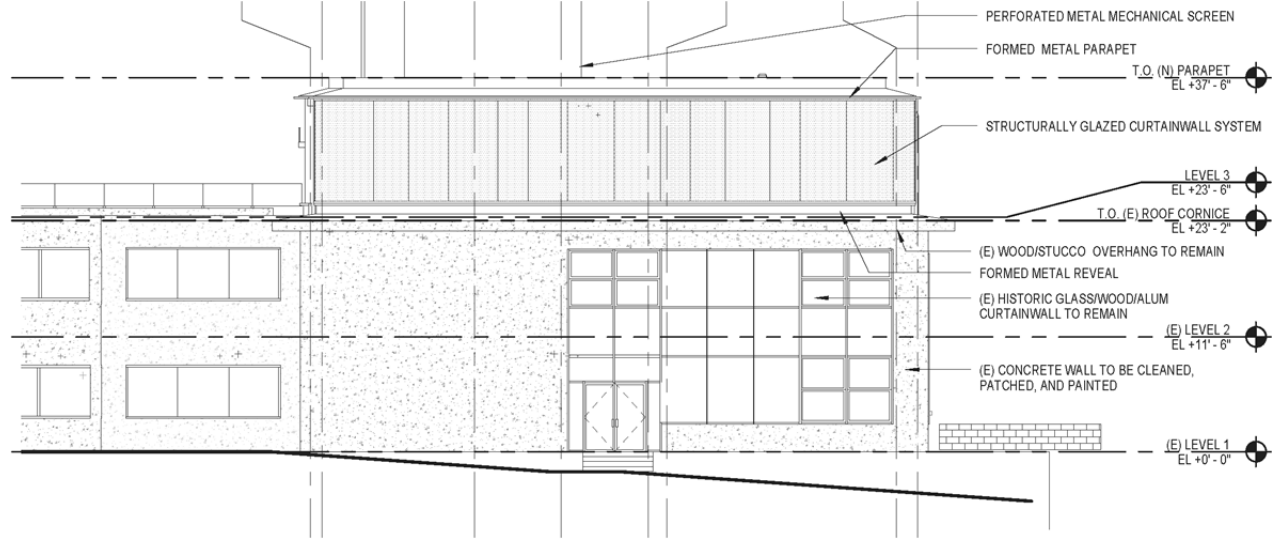
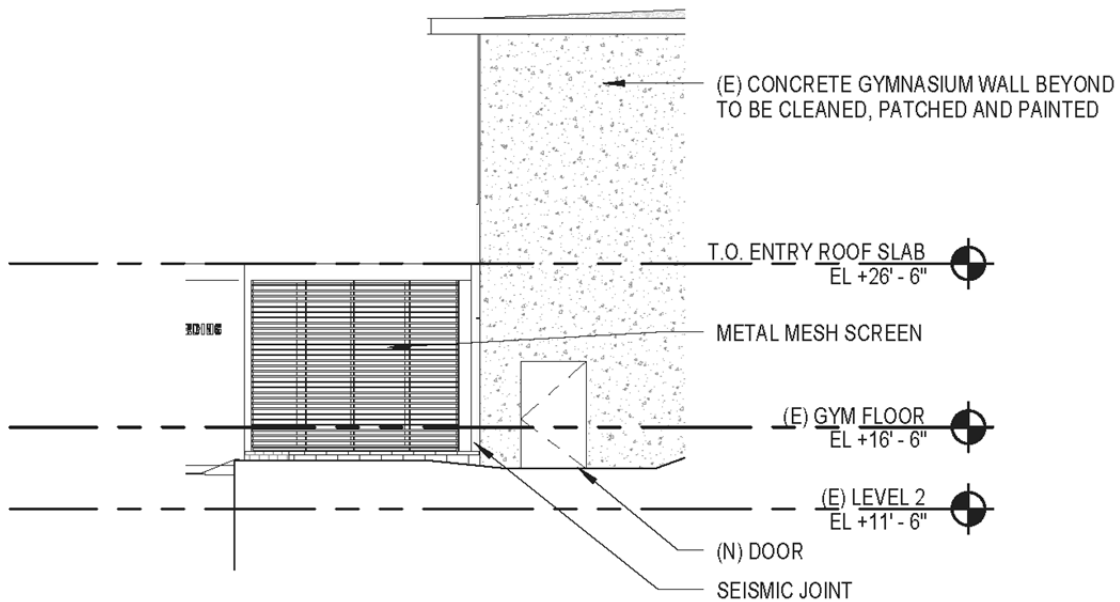


Figure 7d – Proposed Elevations (Facing West - Partial)



EVALUATION OF ENVIRONMENTAL EFFECTS

This Community Plan Exemption (CPE) Checklist evaluates whether the environmental impacts of the proposed project are addressed in the Programmatic Environmental Impact Report for the Balboa Park Station Area Plan (Balboa Park PEIR).¹ The CPE Checklist 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 previously identified significant effects, which as a result of substantial new information that was not known at the time that the Balboa Park 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 impacts are identified, the proposed project is exempt from further environmental review in accordance with Public Resources Code Section 21083.3 and California Environmental Quality Act (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. Improvement measures agreed to by the project sponsor to further reduce less-than-significant impacts of the proposed project are also discussed under each applicable topic area and provided under the Improvement Measures section at the end of this checklist.

The Balboa Park PEIR identified significant impacts related to transportation, noise, air quality, hazardous materials, archeological resources, and historic architectural resources. Additionally, the PEIR identified significant cumulative impacts related to air quality, transportation, and historic architectural resources. Mitigation measures were identified for the above impacts and reduced all impacts to less-than-significant except for those related to transportation (transit capacity and traffic delay) and historic architectural resources.

The proposed project would include construction of a one-story addition to an existing two-story high school building. As discussed below in this checklist, the proposed project would not result in new, significant environmental effects, or effects of greater severity than were already analyzed and disclosed in the Balboa Park PEIR.

CHANGES IN THE REGULATORY ENVIRONMENT

Since the certification of the Balboa Park PEIR in 2008, several new policies, regulations, statutes, and funding measures have been adopted, passed, or are underway that affect the physical environment and/or environmental review methodology for projects in the Balboa Park plan area. As discussed in each topic area referenced below, these policies, regulations, statutes, and funding measures have implemented or will implement mitigation measures or further reduce less-than-significant impacts identified in the PEIR. These include:

- State statute regarding Aesthetics, Parking Impacts, effective January 2014, and state statute and Planning Commission resolution regarding automobile delay, and vehicle miles traveled, (VMT) effective March 2016 (see “CEQA Section 21099” heading below);

¹ San Francisco Planning Department, Balboa Park Station Area Plan Final Environmental Impact Report (PEIR), Planning Department Case No. 2004.1059E, State Clearinghouse No. 2006072114, certified December 4, 2008. Available online at: <http://www.sf-planning.org/index.aspx?page=1893>, accessed September 13, 2016.

- San Francisco Bicycle Plan update adoption in June 2009, Better Streets Plan adoption in 2010, Transit Effectiveness Project (aka “Muni Forward”) adoption in March 2014, Vision Zero adoption by various City agencies in 2014, Proposition A and B passage in November 2014, the Transportation Sustainability Program process, and state statute and Planning Commission resolution regarding automobile delay, and VMT effective March 2016 (see Checklist section “Transportation”);
- San Francisco ordinance establishing Noise Regulations Related to Residential Uses Near Places of Entertainment effective June 2015 (see Checklist section “Noise”);
- San Francisco ordinances establishing Construction Dust Control, effective July 2008, and Enhanced Ventilation Required for Urban Infill Sensitive Use Developments, amended December 2014 (see Checklist section “Air Quality”);
- San Francisco Clean and Safe Parks Bond passage in November 2012 and San Francisco Recreation and Open Space Element of the General Plan adoption in April 2014 (see Checklist section “Recreation”);
- Urban Water Management Plan adoption in 2011 and Sewer System Improvement Program process (see Checklist section “Utilities and Service Systems”); and
- Article 22A of the Health Code amendments effective August 2013 (see Checklist section “Hazardous Materials”).

SENATE BILL 743

Aesthetics and Parking

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 does not meet the third criterion above and thus, this checklist considers aesthetics and parking in determining the significance of project impacts under CEQA.² 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

² San Francisco Planning Department. Eligibility Checklist: CEQA Section 21099 – Modernization of Transportation Analysis for 755 Ocean Avenue (Lick-Wilmerding High School), September 13, 2016. This document (and all other documents cited in this report, unless otherwise noted), is available for review at the San Francisco Planning Department, 1650 Mission Street, Suite 400 as part of Case File No. 2015-006425ENV.

pursuant to Section 21099(b)(1), automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion shall not be considered a significant impact on the environment under CEQA.

In January 2016, OPR published for public review and comment a *Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA*³ recommending that transportation impacts for projects be measured using a VMT metric. On March 3, 2016, in anticipation of the future certification of the revised CEQA Guidelines, the San Francisco Planning Commission adopted OPR’s recommendation to use the VMT metric instead of automobile delay to evaluate the transportation impacts of projects (Resolution 19579). (Note: the VMT metric does not apply to the analysis of project impacts on non-automobile modes of travel such as riding transit, walking, and bicycling.) Therefore, impacts from the Balboa Park PEIR associated with automobile delay are not discussed in this checklist. All of the transportation mitigation measures in the Balboa Park PEIR were associated with automobile delay, and are also not discussed in this checklist. Instead, a VMT analysis is provided in the Transportation section.

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

The Balboa Park PEIR determined that implementation of the Balboa Park Station Area Plan would not create any new physical barriers because the Area Plan does not provide for any new major roadways, such as freeways that would disrupt or divide the plan area. Furthermore, The PEIR determined that some components of the Area Plan, such as the proposed deck over Interstate 280, would reduce existing physical barriers.

The Citywide Planning and Current Planning Divisions of the Planning Department have determined that the proposed project is permitted in the RH-1 District and is consistent with the height, bulk, density, and land use types envisions in the Balboa Park Station Area Plan. The inclusion of a new plaza is consistent with the Plan’s envisioned public realm enhancements. Also, the addition of bicycle parking with no new vehicle parking spaces supports the Plan goal of supporting alternatives to driving.^{4,5}

³ This document is available online at: https://www.opr.ca.gov/s_sb743.php.

⁴ Josh Switzky, San Francisco Planning Department, Community Plan Exemption Eligibility Determination, Citywide Planning and Policy Analysis, 755 Ocean Avenue (Lick-Wilmerding High School), September 27, 2016.

The Balboa Park PEIR found that existing land use patterns would be largely retained by the proposed rezoning, with increased emphasis on mixed-use residential development. The PEIR also found that Area Plan implementation would moderately increase the scale of new development due to changes in height limits. The PEIR concluded that new development would remain similar in scale to surrounding uses, and would not disrupt existing land use patterns or substantially impact the character of the Balboa Park community.

Because the proposed project is consistent with the development density established in the Balboa Park Station Area Plan, implementation of the proposed project would not result in significant impacts that were not identified in the Balboa Park PEIR related to land use and land use planning, and no mitigation measures are necessary.

<i>Topics:</i>	<i>Significant Impact Peculiar to Project or Project Site</i>	<i>Significant Impact not Identified in PEIR</i>	<i>Significant Impact due to Substantial New Information</i>	<i>No Significant Impact not Previously Identified in PEIR</i>
2. AESTHETICS—Would the project:				
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and other features of the built or natural environment which contribute to a scenic public setting?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area or which would substantially impact other people or properties?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The Balboa Park Station Area Plan Initial Study⁶ found that plan implementation would result in development that is taller than existing conditions, but still appropriately scaled for the surrounding low- to mid-rise context. The Area Plan’s architectural and urban design guidelines would cause new development to be compatible with the massing, articulation, and architectural features prevalent in the project area. The Initial Study noted that the uppermost portions of subsequent development projects could be visible from Balboa Park, but would be partly obscured by intervening buildings and existing park vegetation. The Initial Study therefore concluded that the Balboa Park Station Area Plan would not cause substantial adverse effects on any scenic vistas, would not damage scenic resources, and would not degrade the existing visual character or quality of the community. Given that the plan area is in an

⁵ Jeff Joslin, San Francisco Planning Department, Community Plan Exemption Eligibility Determination, Current Planning Analysis, 755 Ocean Avenue (Lick-Wilmerding High School), October 5, 2016.

⁶ Appendix A of the PEIR

existing urbanized environment, no substantial increase in the amount of outdoor lighting from subsequent development projects was anticipated in the Initial Study.

The proposed project consists of a one-story addition to an existing two-story school building. The Initial Study notes that the project site is currently developed with two- to three-story buildings. Therefore, the proposed addition would be consistent with the visual assumptions made in the Initial Study analysis. Furthermore, the one-story addition would not substantially change the height of the subject building, and would remain within the 40-foot height controls that predate the Initial Study. The proposed one-story vertical addition and sound wall at 755 Ocean Avenue would be visible from off-site public open spaces such as Ocean Avenue and portions of Balboa Park, consistent with the Initial Study’s finding that parts of future buildings could be visible from such spaces. No substantial increase in the amount of outdoor lighting on the project site is anticipated, given that the proposed project consists of a vertical addition to an existing building. For the reasons above, no new significant impacts not previously analyzed in the Initial Study would result from the proposed project, and no new mitigation measures would be required.

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

The Balboa Park PEIR found that the Balboa Park Station Area Plan would result in a net increase of 4,095 residents and 238 jobs by the year 2025. The PEIR determined that, while the Area Plan would generate household and job growth, it would not cause significant impacts because it would focus new housing development in an established urban area that has a high level of transportation and other public services that can accommodate the projected growth. The PEIR concluded that increased employment attributable to the Area Plan would not create substantial demand for increased public service and utilities, and would create demand for housing equivalent to a small fraction of the 1,780 new housing units anticipated to be developed under the plan by the year 2025. The PEIR determined that the expected increase in population and density would not result in significant adverse physical effects on the environment. No mitigation measures were identified in the PEIR.

The proposed project would add six classrooms, 160 students, and 12 employees to an existing private high school. This relatively small expansion in employment represents approximately five percent of the overall employment growth anticipated in the PEIR. The addition of new students to the school would not generate substantial demand for new housing in the area, and the new students are likely to reside in dispersed locations throughout the Bay Area, similar to the existing student body.⁷ The direct effects of the proposed project on population, housing, and employment are within the scope of the population growth anticipated under the Balboa Park Station Area Plan and evaluated in the Balboa Park PEIR.

For the above reasons, the proposed project would not result in significant impacts on population, housing, and employment that were not identified in the Balboa Park PEIR.

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

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 Balboa Park PEIR anticipated that implementation of the Balboa Park Station Area Plan may result in the demolition of buildings identified as contributors to a potential historic district (the Ocean Avenue Neighborhood Commercial Historic District, approximately one-third of a mile east of the 755 Ocean Avenue project site). The PEIR determined that a significant cumulative impact to historic resources would occur due to the loss of contributing buildings, and the construction of considerably taller infill buildings in their place and on other sites within the boundaries of the potential district. The PEIR also determined that impacts on the potential Balboa Park Historic District (located across Interstate 280 from the project site) and the Geneva Office Building (located at the southeast corner of San Jose and Geneva Avenues, approximately one-quarter mile from the project site) would be less than significant.

⁷ One-third of the student body lives outside of San Francisco, according to school records.

A Historic Resource Evaluation (HRE)⁸ was prepared for the proposed 755 Ocean Avenue project. The Preservation Team Review (PTR)⁹ completed by Planning Department preservation staff in reliance upon the HRE concluded that the existing school building to be expanded is a historic resource under California Register of Historic Resources (CRHR) Criterion 1 (events) and Criterion 3 (architecture). The PTR noted that the proposed project would preserve the site's school use, consistent with its eligibility for Criterion 1 as one of the longest-operating private schools in San Francisco. The vertical addition would be compatible with the building's historic materials, proportion, massing, and size, though some original features and materials would be removed. Given that most of the building's character-defining features would be retained and the proposed design is in conformance with seven of the ten *Secretary of the Interior's Standards for Rehabilitation*¹⁰, the PTR concluded that the building would still convey its historic significance and retain eligibility for listing in the CRHR after implementation of the proposed project. The proposed one-story vertical addition at 755 Ocean Avenue would be visible from off-site public open spaces such as Ocean Avenue and Balboa Park, consistent with the Balboa Park Station Area Plan Initial Study's finding that parts of future buildings could be visible from such spaces. Therefore, the proposed project would not contribute to the significant historic resource impact identified in the Balboa Park PEIR, and no historic resource mitigation measures would apply to the proposed project.

For the above reasons, the proposed project would not result in significant impacts on historic architectural resources that were not identified in the Balboa Park PEIR.

Archeological Resources

The Balboa Park PEIR identified potentially significant archeological impacts related to the Area Plan and identified two archeological mitigation measures that would reduce impacts to a less-than-significant level. PEIR Mitigation Measure AM-1 (Accidental Discovery) applies to projects involving activities including excavation, construction of foundations, soils improvement/densification, and installation of utilities or soils remediation resulting in soils disturbance/modification to a depth of four feet or greater below ground surface. PEIR Mitigation Measure AM-2 (Archeological Monitoring Program) applies to any project involving any soils-disturbing activities greater than 10 feet in depth, including excavation, installation of foundations or utilities or soils remediation, and to any soils-disturbing project of any depth within the Phelan Loop and Kragen Auto Parts Sites, the east side of San Jose between Ocean and Geneva Avenues, and the Upper Yard Parcel.

The proposed project would require excavation at depths of up to 14 feet below grade. Therefore, PEIR Mitigation Measure AM-2 would apply to the proposed project. The requirements of PEIR Mitigation Measure AM-2 exceed the requirements of PEIR Mitigation Measure AM-1, therefore only PEIR Mitigation Measure AM-2 is applicable. The Planning Department's archeology staff reviewed the proposed 755 Ocean Avenue project through the Preliminary Archeology Review (PAR) process and concluded that these mitigation measures would reduce the project's potential impacts on archeological resources to a less-than-significant level.¹¹ The project sponsor has agreed to implement PEIR Mitigation Measure AM-2 as **Project Mitigation Measure 1**.

⁸ Page & Turnbull, *Lick-Wilmerding High School, 755 Ocean Avenue, Historic Resource Evaluation Parts 1 & 2*. August 29, 2016.

⁹ Tina Tam, San Francisco Planning Department, *Preservation Team Review Form, 755 Ocean Avenue*. September 2, 2016.

¹⁰ Available online at: <https://www.nps.gov/tps/standards/rehabilitation/rehab/stand.htm>. Accessed on September 13, 2016.

¹¹ Allison Vanderslice, San Francisco Planning Department, *PAR Review* e-mail dated April 4, 2016.

For these reasons, the proposed project would not result in significant impacts on archeological resources that were not identified in the Balboa Park PEIR.

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

The Balboa Park PEIR anticipated that growth resulting from the zoning changes would not result in significant impacts related to pedestrians, bicyclists, loading, emergency access, or construction. As the proposed project is within the development projected under the Balboa Park Station Area Plan, there would be no additional impacts on pedestrians, bicyclists, commercial loading, or emergency access beyond those analyzed in the Balboa Park PEIR. Potential passenger loading and construction impacts are discussed further in the respectively-titled subsections below.

However, the Balboa Park PEIR anticipated that growth resulting from the zoning changes could result in significant impacts on transit ridership on the K-Ingleside Muni line, and concluded that no mitigation measures are feasible. Thus, these impacts were found to be significant and unavoidable. As discussed above under “SB 743”, in response to state legislation that called for removing automobile delay from CEQA analysis, the Planning Commission adopted resolution 19579 replacing automobile delay with a VMT metric for analyzing transportation impacts of a project. Therefore, impacts and mitigation measures from the Balboa Park PEIR associated with automobile delay are not discussed in this checklist.

Since all of the transportation mitigation measures in the Balboa Park PEIR are associated with automobile delay, none of them are discussed further in this checklist.

The Balboa Park PEIR did not evaluate VMT. The VMT Analysis presented below evaluates the project's transportation effects using the VMT metric.

The project site is not located within an airport land use plan area, or in the vicinity of a private airstrip. Therefore, the Community Plan Exemption Checklist topic 4c is not applicable.

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. Transportation analysis zones are used in transportation planning models for transportation analysis and other planning purposes. The zones vary in size from single city blocks in the downtown core, multiple blocks in outer neighborhoods, to even larger zones in historically industrial areas like the Hunters Point Shipyard.

The San Francisco County Transportation Authority (Transportation Authority) uses the San Francisco Chained Activity Model Process (SF-CHAMP) to estimate VMT by private automobiles and taxis for different land use types. Travel behavior in SF-CHAMP is calibrated based on observed behavior from the California Household Travel Survey 2010-2012, Census data regarding automobile ownership rates and county-to-county worker flows, and observed vehicle counts and transit boardings. SF-CHAMP uses a synthetic population, which is a set of individual actors that represents the Bay Area's actual population, who make simulated travel decisions for a complete day. The Transportation Authority uses tour-based analysis for office and residential uses, which examines the entire chain of trips over the course of a day, not just trips to and from the project. For retail uses, the Transportation Authority uses trip-based analysis, which counts VMT from individual trips to and from the project (as opposed to entire chain of trips). A trip-based approach, as opposed to a tour-based approach, is necessary for retail projects because a tour is likely to consist of trips stopping in multiple locations, and the summarizing of tour VMT to each location would over-estimate VMT.^{12,13}

For schools, regional average daily work-related VMT per employee is 19.1. Average daily VMT for schools is projected to decrease in future 2040 cumulative conditions. Refer to **Table 1, Daily Vehicle**

¹² To state another way: a tour-based assessment of VMT at a retail site would consider the VMT for all trips in the tour, for any tour with a stop at the retail site. If a single tour stops at two retail locations, for example, a coffee shop on the way to work and a restaurant on the way back home, then both retail locations would be allotted the total tour VMT. A trip-based approach allows us to apportion all retail-related VMT to retail sites without double-counting.

¹³ San Francisco Planning Department, Executive Summary: Resolution Modifying Transportation Impact Analysis, Appendix F, Attachment A, March 3, 2016.

Miles Traveled, which includes the transportation analysis zone (TAZ) in which the project site is located, TAZ 43.

Table 1 Daily Vehicle Miles Traveled

<u>Land Use</u>	<u>Existing</u>			<u>Cumulative 2040</u>		
	<u>Bay Area Regional Average</u>	<u>Bay Area Regional Average minus 15%</u>	<u>TAZ 43</u>	<u>Bay Area Regional Average</u>	<u>Bay Area Regional Average minus 15%</u>	<u>TAZ 43</u>
Employment (School)	19.1	16.2	13.0	17.0	14.5	10.6

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) *Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA* ("proposed transportation impact guidelines") 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 transportation analysis zone that exhibits low levels of VMT; Small Projects are projects that would generate fewer than 100 vehicle trips per day; and 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 of greater than or equal to 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.

As mentioned above, existing average daily VMT per capita is 13.0 for the TAZ the project site is located in, TAZ 43. This is 32 percent below the existing regional average daily VMT per capita of 19.1. Given the project site is located in an area where existing VMT is more than 15 percent below the existing regional average, the proposed project's expanded school use would not result in substantial additional VMT and impacts would be less-than-significant.¹⁴

The project sponsor has agreed to implement several improvement measures to further reduce the proposed project's less-than-significant VMT impacts. These measures include:

- **Project Improvement Measure 1, Transportation Demand Management (TDM) Coordinator**
- **Project Improvement Measure 2, TDM Data Collection Access**
- **Project Improvement Measure 3, Provide Information on Active Transportation Routes to/from School Site**
- **Project Improvement Measure 4, Encourage Carpooling**
- **Project Improvement Measure 5, Participate In Local and Regional Transit Programs**

¹⁴ San Francisco Planning Department. Eligibility Checklist: CEQA Section 21099 – Modernization of Transportation Analysis for 755 Ocean Avenue (Lick-Wilmerding High School), September 13, 2016.

- **Project Improvement Measure 6, Emergency Ride Home Program**

These measures would help encourage students and staff to use methods other than solo driving to access the project site. Provision of bicycle route information, facilitation of carpool formation, participation in discounted transit pass programs, and provision of emergency rides home could cause some students and staff to change their travel behavior and use alternatives to solo driving more often. Having a TDM coordinator and allowing City staff access to collect TDM-related data would reinforce the TDM program and allow for its effectiveness to be continually improved, thereby further increasing that chances of students and staff choosing alternative transportation modes. The full text of these improvement measures is provided in the Improvement Measures section at the end of this checklist.

Trip Generation

The proposed project would add an additional story onto an existing two-story high school building, expanding the square footage by 16,209 sf. The proposed expansion would accommodate six new classrooms, 160 additional students, and 12 additional employees.

Localized trip generation of the proposed project was calculated using a trip-based analysis and information from employee and student surveys.^{15,16} The proposed project would generate an estimated 229 net new person trips (inbound and outbound) during the weekday a.m. peak hour (7:00 a.m. to 8:00 a.m.), including 79 vehicle trips (most containing multiple people), 67 transit trips, 7 walk trips and 3 trips by other modes. During the mid-afternoon peak hour (2:45 p.m. to 3:45 p.m.), close to school dismissal time, the proposed project would generate an estimated 122 net new person trips, consisting of 37 vehicle trips (most containing multiple people), 62 transit trips, 8 walk trips and 2 trips by other modes. During the p.m. peak hour (5:00 p.m. to 6:00 p.m.), the proposed project would generate an estimated 52 net new person trips, consisting of 16 vehicle trips (most containing multiple people), 26 transit trips, 3 walk trips and 1 trip by other modes.

Transit

The Balboa Park PEIR found that transit capacity impacts on the K-Ingleside Muni line would be significant and unavoidable. Implementation of the Balboa Park Station Area Plan would contribute about 33 p.m. peak period trips to the future ridership on the K-Ingleside line at the maximum load point, increasing the already-exceeded capacity utilization during the p.m. peak period. This contribution of about six percent would be considered a significant contribution to cumulative adverse transit conditions on this line. The PEIR noted that capacity would be exceeded on the K-Ingleside line, both with and without the addition of transit riders generated by the proposed Area Plan. The PEIR did not identify feasible mitigation measures to reduce this impact to a less-than-significant level. Mitigations measures (e.g., running double-trains during p.m. peak hours) could reduce this impact; however, at a program level of analysis, there is no assurance that the San Francisco Municipal Transportation Agency would be able to fund or implement these measures. For the purposes of CEQA review, no feasible mitigation measures have been identified, and therefore, the impact on the K-Ingleside line would remain significant and unavoidable.

¹⁵ Fehr & Peers, *Lick-Wilmerding High School Circulation Study*, September 30, 2016.

¹⁶ Fehr & Peers, San Francisco Planning Department; *755 Ocean – Trip Generation Tables*, September 29, 2016.

The proposed project is estimated to add about 26 p.m. peak hour transit person trips, which would be spread across several Muni and BART lines, with some of the trips likely using the K-Ingleside line. Consistent with the assumptions in the Balboa Park PEIR, it is anticipated that the proposed project would add transit trips to the K-Ingleside line. Given that the proposed project is an addition to a high school, the majority of transit trips generated by the proposed project would be outside of the traditional p.m. peak period of 4:00 p.m. to 6:00 p.m., when overall systemwide ridership is highest. Instead, the greatest concentrations of net new transit trips generated by the project would be in the morning and the mid-afternoon (67 trips and 62 trips, respectively), clustered around the beginning and end of the school's 8:30 a.m. to 3:20 p.m. class schedule. Since the proposed project would primarily add transit trips at times when background transit ridership is not at its peak, and would add a minor amount of trips during the p.m. peak period (26 net new transit trips) that would be spread across multiple lines, the proposed project would not contribute considerably to the significant unavoidable transit impact on the K-Ingleside line (addition of 33 p.m. peak period trips by the Balboa Park Station Area Plan) identified in the Balboa Park PEIR.

The project site is served by other local transit lines including Muni lines 8/8BX-Bayshore, 29-Sunset, 43-Masonic, 49-Van Ness/Mission, and 54 Felton, as well as BART. The proposed project's streetscape changes would not substantially interfere with any nearby transit routes. The addition of a sidewalk bulb-out on Ocean Avenue would likely expedite and facilitate transit boarding for the 29-Sunset and 49-Van Ness/Mission lines. The proposed project would be expected to generate 67 net new transit trips during the a.m. peak hour, 62 net new transit trips during the mid-afternoon peak hour, and 26 net new transit trips during the p.m. peak hour. Given the wide availability of nearby transit, the addition of 26 net new p.m. peak hour transit trips would be accommodated by existing capacity. As such, the proposed project would not result in unacceptable levels of transit service or cause a substantial increase in delays or operating costs such that significant adverse impacts in transit service could result.

Project Improvement Measures 1 through 6, discussed in the VMT Analysis section above, could increase the number of new transit riders by incentivizing some solo drivers to switch to transit. However, the number of net new students and staff who would drive alone to the project site is relatively small (approximately 17 students and 55 staff) compared to the available transit capacity in the area (several Muni and BART lines). Therefore, implementation of these proposed improvement measures would not cause any new or substantially more severe transit impacts than those identified in the PEIR, nor would they cause the proposed project to contribute considerably to the significant unavoidable transit impact identified for the K-Ingleside line in the Balboa Park PEIR.

Passenger Loading/Circulation and Queuing

The Balboa Park PEIR did not analyze the loading impacts of future development projects at the 755 Ocean Avenue site because information about the current development proposal was not available at the time of PEIR preparation. The Circulation Memorandum prepared for the proposed project analyzed the capability of the proposed passenger loading zones along Ocean Avenue and Howth Street to handle the expanded student pick-up/drop-off demand, including during construction.¹⁷ The maximum number of vehicles expected to attempt to access the passenger loading zones at any one time during the morning

¹⁷ Fehr & Peers, *Lick-Wilmerding High School Circulation Study*, September 30, 2016.

drop-off period would increase from 14 to a new total of 19. In the afternoon pick-up period, the maximum number would increase from 18 to a new total of 24. The loading zone along Ocean Avenue is currently large enough to accommodate three vehicles, and would be lengthened along Ocean Avenue and along Howth Street to accommodate 13 vehicles, as coordinated with San Francisco Municipal Transportation Agency staff through the Streetscape Design Advisory Team and Circulation Memorandum review processes.

Under existing conditions, passenger loading zone queues on Ocean Avenue occasionally extend into the Howth Street bus stop, crosswalk, and intersection. These queues occasionally block transit, pedestrian, and automobile circulation. Despite the proposed lengthening of the loading zone, which would utilize the entire available Ocean Avenue and Howth Street frontages adjacent to the project site, vehicles may queue momentarily while waiting for a loading zone space to become available. This queuing would likely occur in the rightmost travel lane on Howth Street, as per current observed behavior. However, some queuing on Ocean Avenue (including in the bus zone adjacent to the project site) may occur for approximately 30 minutes per day, during the mid-afternoon peak hour (2:45 p.m. to 3:45 p.m.), and would not block through traffic traveling along the leftmost travel lane on Howth Street.¹⁸ This queuing may result in occasional conflicts with transit vehicle circulation, which would be limited to brief periods of the day outside of the p.m. peak hour. As such, the passenger loading impacts would be less than significant, and no new significant impacts not previously identified in the Balboa Park PEIR would occur.

The project sponsor has agreed to implement **Project Improvement Measure 7, Passenger Loading Plan**, which calls for attendants to monitor the passenger loading areas during pick-up/drop-off periods and ask drivers to move forward as needed to avoid queuing. Signage clearly indicating the loading zone hours would be posted in front of the school, and pick-up/drop-off procedures would be distributed to all students' families. Implementation of this improvement measure would further reduce the possibility of queuing and circulation conflicts around the passenger loading zones.

Parking

The Balboa Park PEIR anticipated that new development may include less than the maximum number of allowed off-street parking spaces, and may include no off-street parking at all. The PEIR accordingly estimated a potential parking shortfall ranging from 929 to 3,004 parking spaces during weekday evening period. This magnitude of parking shortfall may make it difficult for drivers to find parking in the plan area, and may cause drivers to use other modes of travel or park farther away. The PEIR concluded that this parking shortfall relative to demand would not constitute a significant impact in the urban context of San Francisco.

The project site currently contains 56 off-street parking spaces, which are usually fully occupied during school hours. There is a total of 99 on-street parking spaces in the area, of which 46 are unrestricted (other than street cleaning). The remainder of on-street parking is unmetered short-term/residential parking (two-hour maximum, Monday through Friday 8:00 AM to 6:00 PM, residential 'permits required for longer stays). These on-street parking spaces are typically 69 to 73 percent occupied during school

¹⁸ Howth Street is a two-lane, one-way residential street.

hours. The 53 on-street parking spaces that are restricted to two-hour stays are not likely to be used by students and staff, since school hours would require longer stays.

The proposed project would remove 16 on-street parking spaces, and would not add any off-street parking spaces. Based on current travel behavior patterns, the proposed project's expansion of the school population by 160 students and 12 employees would increase parking demand by 12 spaces, which could not be accommodated by the existing on-street parking supply, given that many of the nearby spaces are restricted to two-hour stays. As a result of the parking shortfall, some drivers may circle around the neighborhood in search of parking, which would slightly increase traffic congestion on the local street network, though not to noticeable levels. The City College parking lot across Ocean Street may also be able to accommodate additional student parking needs. As anticipated in the PEIR, drivers faced with the shortage of available parking may shift to other modes, while others may search for parking farther from the project site. Therefore, the proposed project would not result in any new significant parking impacts not previously analyzed in the PEIR.

Project Improvement Measures 1 through 6, discussed in the VMT Analysis section above, could incentivize some drivers to switch to transit, walking, and bicycling, thereby reducing the proposed project's overall parking demand.

Construction

The Balboa Park PEIR anticipated temporary intermittent transit, parking, and circulation impacts due to truck movements to and from construction sites, which would be less-than-significant. Truck movements would have the greatest potential to create conflicts during peak hours, due to the higher number of vehicles, pedestrians, and bicyclists present on the streets during those times. The PEIR also identified the possibility of temporary increases in parking demand due to construction workers, compounded by the use of parking lanes for construction purposes.

For the proposed 755 Ocean Avenue project, all construction would occur along the site's Ocean Avenue frontage. Trucks arriving from the south, east, and north would access the site via Interstate 280. Trucks would exit onto westbound Geneva Avenue before turning right onto Ocean Avenue at the intersection of Geneva Avenue/Ocean Avenue, thereby avoiding the Howth Street, which is a smaller residential street. Throughout the construction period, construction vehicles, a construction office trailer, and a storage container would be located on the eastern-most part of the Project's frontage along Ocean Avenue. A covered pedestrian walkway would be installed to maintain use of the sidewalk. Pedestrian access to the school during construction would occur via the existing pedestrian entry on Geneva Avenue. The Ocean Avenue entrance would be closed.

Two temporary passenger loading zones would be located on the Project's frontage on Geneva Avenue: a zone immediately north of the proposed pedestrian crosswalk at Louisburg Street would accommodate six vehicles, while a second zone located in front of the project site's Geneva Avenue entrance would accommodate two vehicles. This would represent an increase in loading capacity compared to the existing loading zone on Ocean Avenue, which holds three vehicles. The temporary loading zones would therefore accommodate eight vehicles in total. Although these temporary zones would not fully accommodate the maximum existing loading demand of 18 vehicles, they would accommodate more vehicles than the existing loading zone on Ocean Avenue, and would therefore not worsen loading

conditions compared to existing conditions. Therefore, the construction of the proposed project would not result in any significant transportation impacts not previously identified in the PEIR.

As discussed in the Passenger Loading/Circulation and Queuing section above, the project sponsor has agreed to implement **Project Improvement Measure 7, Passenger Loading Plan**, which calls for attendants to monitor the passenger loading areas during pick-up/drop-off periods and ask drivers to move forward as needed to avoid queuing. Signage clearly indicating the loading zone hours would be posted in front of the school, and pick-up/drop-off procedures would be distributed to all students' families. Implementation of this improvement measure would further reduce the possibility of queuing and circulation conflicts around the passenger loading zones.

Cumulative Impacts

Several reasonably foreseeable projects are proposed in the vicinity of the project site:

- Balboa Park Station Upper Yard: This project consists of a proposed mixed-use affordable housing development adjacent to the Balboa Park BART station at San Jose and Geneva Avenues. The development would be on a one-half acre site, with allowable building heights ranging from 45 to 85 feet. The square footage and dwelling unit count have not yet been determined.
- Ocean and Geneva Corridor Design: This City-sponsored project proposes streetscape enhancements such as street trees, sidewalk landscaping, pedestrian scale lighting, public art and seating along Ocean and Geneva Avenues, including the 755 Ocean Avenue project site frontages.
- Muni Forward: The Muni Forward Plan proposes improvements and increased frequencies on current bus routes servicing Geneva and San Jose Avenues. These routes include the M-Ocean View, K-Ingleside, 8/8BX-Bayshore, 29-Sunset, 43-Masonic, 49-Van Ness/Mission 54-Felton and 88-BART Shuttle. Potential transit improvements adjacent to the 755 Ocean Avenue project site include establishment of a bus zone on Geneva Avenue at Howth Street and addition of pedestrian bulbs at the Interstate 280 on- and off-ramps at Geneva Avenue.

The Balboa Park Station Upper Yard development project could increase trips to and from the surrounding area, but would also include improvement measures that align with City transportation goals to prioritize pedestrian, bicycle, and transit travel. The Upper Yard site is located across Interstate 280 from the 755 Ocean Avenue project site, and therefore would not have the potential to cause construction-related modal conflicts in conjunction with the proposed project because construction traffic for the two projects would be segregated by the freeway and ramp intersections.

The Ocean and Geneva Corridor Design and Muni Forward improvements would not be precluded by the streetscape improvements proposed as part of the 755 Ocean Avenue project. The Transportation Advisory Staff Committee would review the Ocean Avenue Streetscape Plan and Muni Forward projects to ensure that no circulatory hazards would occur in conjunction with the proposed 755 Ocean Avenue project. Additionally, the Interdepartmental Staff Committee on Traffic and Transportation would review any temporary road closures proposed for these projects to promote coordination and avoid circulation hazards. Therefore, the impacts of the proposed project combined with the impacts of other reasonably foreseeable projects would not be cumulatively significant. No significant cumulative transportation impacts beyond those analyzed in the PEIR would occur.

Conclusion

For the above reasons, the proposed project would not result in significant impacts that were not identified in the Balboa Park PEIR related to transportation and circulation and would not contribute considerably to cumulative transportation and circulation impacts that were identified in the Balboa Park PEIR.

<u>Topics:</u>	<i>Significant Impact Peculiar to Project or Project Site</i>	<i>Significant Impact not Identified in PEIR</i>	<i>Significant Impact due to Substantial New Information</i>	<i>No Significant Impact not Previously Identified in PEIR</i>
6. NOISE—Would the project:				
a) Result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) For a project located within an airport land use plan area, or, where such a plan has not been adopted, in an area within two miles of a public airport or public use airport, would the project expose people residing or working in the area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) For a project located in the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Be substantially affected by existing noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The Balboa Park Initial Study determined that implementation of the Balboa Park Station Area Plan would result in less-than-significant noise impacts during construction activities in light of San Francisco Noise Ordinance (Noise Ordinance, Article 29 of the San Francisco Police Code) requirements. The Balboa Park PEIR noted that the existing ambient noise environment within the plan area is dominated by vehicular traffic on the I-280 freeway and traffic on local roadways, and that some streets have higher background noise levels, such as Ocean Avenue. The Balboa Park PEIR also determined that incremental increases in traffic-related noise attributable to implementation of the Balboa Park Station Area Plan would be less than significant. No increases in vibration due to plan-related growth were identified in the

PEIR. The Balboa Park PEIR identified two noise and vibration mitigation measures, neither of which would be applicable to subsequent development projects.¹⁹

Construction Noise

The proposed project does not include pile driving or particularly noisy construction methods. In addition, all construction activities for the proposed project (approximately 16 months) would be subject to and required to comply with the Noise Ordinance. The Noise Ordinance requires construction work to be conducted in the following manner: (1) noise levels of construction equipment, other than impact tools, must not exceed 80 dBA 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 Public Works (PW) or the Director of the 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 PW authorizes a special permit for conducting the work during that period.

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.). The Police Department is responsible for enforcing the Noise Ordinance during all other hours. Nonetheless, during the construction period for the proposed project of approximately 16 months, occupants of the nearby properties could be disturbed by construction noise. Times may occur when noise could interfere with indoor activities in nearby residences and other businesses near the project site. The increase in noise in the project area during project construction would not be considered a significant impact of the proposed project, because the construction noise would be temporary, intermittent, and restricted in occurrence and level, as the contractor would be required to comply with the Noise Ordinance, which would reduce construction noise impacts to a less-than-significant level.

Operational Noise and Vibration

The proposed project includes expansion of an existing high school, located next to noisy transportation facilities (the Interstate 280 freeway and the K-Ingleside light rail line). The proposed project is not expected to generate noise levels in excess of ambient noise in the project vicinity. The expansion of the school's enrollment from 490 students to a new total of 650 may cause additional noise to be generated by students using the outdoor recreation areas. However, these areas are shielded from adjacent sensitive receptors (single-family houses) by existing buildings on the project site, and therefore would not noticeably increase noise levels for sensitive land uses. The proposed project would be subject to the California Building Standards Code (Title 24) interior noise standards, which are described for informational purposes. Title 24 establishes uniform noise insulation standards, and the acoustical

¹⁹ Balboa Park PEIR Mitigation Measures N-1 and N-2 address the siting of sensitive land uses in noisy environments or near transit facilities that produce vibration. 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 Balboa Park PEIR determined that incremental increases in vibration and traffic-related noise attributable to implementation of the Balboa Park Station Area Plan would be less than significant, and thus would not exacerbate the existing noise environment. Therefore, Balboa Park PEIR Mitigation Measures N-1 and N-2 are not applicable. Nonetheless, for all noise sensitive uses, the general requirements for adequate interior noise levels of Mitigation Measure N-1 are met by compliance with the acoustical standards required under the California Building Standards Code (California Code of Regulations Title 24).

requirements of Title 24 are incorporated into the San Francisco Green Building Code. Title 24 allows the project sponsor to choose between a prescriptive or performance-based acoustical requirement for non-residential uses. Both compliance methods require wall, floor/ceiling, and window assemblies to meet certain sound transmission class or outdoor-indoor sound transmission class ratings to ensure that adequate interior noise standards are achieved. In compliance with Title 24, DBI would review the final building plans to ensure that the building wall, floor/ceiling, and window assemblies meet Title 24 acoustical requirements. If determined necessary by DBI, a detailed acoustical analysis of the exterior wall and window assemblies may be required.

The proposed project is not expected to increase ambient vibration levels, which are dominated by Muni light rail operations in the vicinity of the project site. The Federal Transit Administration (FTA) criteria for ground borne vibration²⁰ define an acceptable threshold of 75 vibration decibels (VdB) for institution land uses with primarily daytime use, such as high schools, where vibration events are likely to occur more than 70 times per day.²¹ Measurements taken inside the project site classroom closest to the light rail tracks showed a maximum vibration level of 71 VdB associated with train operations.²² These measurements demonstrate that train operations do not cause the applicable FTA vibration level criterion of 75 VdB to be exceeded on the project site. The proposed project consists of a vertical addition to an existing high school building, and would not cause any classrooms to be located closer to the light rail tracks than the measurement locations. Therefore, the proposed project is not expected to substantially increase the school’s exposure to train-related vibration.

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, topic 12e and f from the CEQA Guidelines, Appendix G is not applicable.

For the above reasons, the proposed project would not result in significant noise impacts that were not identified in the Balboa Park PEIR.

<i>Topics:</i>	<i>Significant Impact Peculiar to Project or Project Site</i>	<i>Significant Impact not Identified in PEIR</i>	<i>Significant Impact due to Substantial New Information</i>	<i>No Significant Impact not Previously Identified in PEIR</i>
7. AIR QUALITY—Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

²⁰ Federal Transit Administration, *Transit Noise and Vibration Impact Assessment*, May 2006. Available online at: https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/FTA_Noise_and_Vibration_Manual.pdf. Accessed on September 14, 2016.

²¹ The K-Ingleside light rail line runs adjacent to the project site approximately every 10 minutes in each direction throughout the day. Therefore, train pass-bys would be classified as “frequent events” (more than 70 occurrences per day).

²² Charles M. Salter Associates Inc., *Lick Wilmerding High School Renovation Environmental Noise Intrusion and Light Rail Vehicle Vibration Study*, September 20, 2016.

<i>Topics:</i>	<i>Significant Impact Peculiar to Project or Project Site</i>	<i>Significant Impact not Identified in PEIR</i>	<i>Significant Impact due to Substantial New Information</i>	<i>No Significant Impact not Previously Identified in PEIR</i>
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal, state, or regional ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The Balboa Park Initial Study identified potentially significant air quality impacts resulting from construction activities and impacts to sensitive land uses²³ as a result of exposure to elevated levels of diesel particulate matter (DPM) and other toxic air contaminants (TACs). The Balboa Park PEIR identified two mitigation measures that would reduce these air quality impacts to less-than-significant levels and stated that with implementation of identified mitigation measures, the Area Plan would be consistent with the Bay Area 2005 Ozone Strategy, the applicable air quality plan at that time. The PEIR also identified a potentially significant impact to future residences from existing diesel exhaust odors emanating from the Phelan Loop bus layover area, and included a mitigation measure requiring provision of upgraded ventilation systems in new residential buildings, which would reduce the impact to a less-than-significant level. This mitigation measure, Balboa Park PEIR Mitigation Measure AQ-2, has been superseded by San Francisco Health Code Article 38, as discussed below, and is no longer applicable. The PEIR did not identify any increases in odors that would be caused by plan implementation. All other operational air quality impacts were found to be less than significant. Balboa Park PEIR Mitigation Measure AQ-1 addresses air quality impacts during construction.

Construction Dust Control

Balboa Park PEIR Mitigation Measure AQ-1 Construction Air Quality requires individual projects involving construction activities to include dust control measures and to maintain and operate construction equipment so as to minimize exhaust emissions of particulates and other pollutants. The San Francisco Board of Supervisors subsequently approved a series of amendments to the San Francisco Building and Health Codes, generally referred to as the Construction Dust Control Ordinance (Ordinance 176-08, effective July 30, 2008). The intent of the Construction Dust Control Ordinance is to reduce the quantity of fugitive dust generated during site preparation, demolition, and construction work in order to protect the health of the general public and of on-site workers, minimize public nuisance complaints, and to avoid orders to stop work by DBI. Project-related construction activities would result in construction dust, primarily from ground-disturbing activities. In compliance with the Construction Dust Control Ordinance, the project sponsor and contractor responsible for construction activities at the project site

²³ The Bay Area Air Quality Management District (BAAQMD) considers sensitive receptors as: children, adults or seniors occupying or residing in: 1) residential dwellings, including apartments, houses, condominiums, 2) schools, colleges, and universities, 3) daycares, 4) hospitals, and 5) senior care facilities. BAAQMD, Recommended Methods for Screening and Modeling Local Risks and Hazards, May 2011, page 12.

would be required to control construction dust on the site through a combination of watering disturbed areas, covering stockpiled materials, street and sidewalk sweeping and other measures.

The regulations and procedures set forth by the San Francisco Dust Control Ordinance would ensure that construction dust impacts would not be significant. These requirements supersede the dust control provisions of PEIR Mitigation Measure AQ-1. Therefore, the portion of PEIR Mitigation Measure AQ-1 Construction Air Quality that addresses dust control is no longer applicable to the proposed project.

Criteria Air Pollutants

The Bay Area Air Quality Management District's (BAAQMD) *CEQA Air Quality Guidelines* (Air Quality Guidelines) provide screening criteria²⁴ 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. 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 be below the Air Quality Guidelines screening criteria. The proposed project would add 16,209 sf and 160 students to an existing high school. This is less than the BAAQMD operational CAP screening size of 311,000 sf and 2,390 students, and the construction CAP screening size of 277,000 sf and 3,261 students. Therefore, the project would not have a significant impact related to criteria air pollutants, and a detailed air quality assessment is not required.

Health Risk

Since certification of the PEIR, San Francisco Board of Supervisors approved a series of amendments to the San Francisco Building and Health Codes, generally referred to as the Enhanced Ventilation Required for Urban Infill Sensitive Use Developments or Health Code, Article 38 (Ordinance 224-14, amended December 8, 2014)(Article 38). The Air Pollutant Exposure Zone as defined in Article 38 are areas that, based on modeling of all known air pollutant sources, exceed health protective standards for cumulative PM_{2.5} concentration, cumulative excess cancer risk, and incorporates health vulnerability factors and proximity to freeways. For sensitive use projects within the Air Pollutant Exposure Zone, such as the proposed project, 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. DBI will not issue a building permit without written notification from the Director of Public Health that the applicant has an approved Enhanced Ventilation Proposal. In compliance with Article 38, the project sponsor has submitted an initial application to DPH.²⁵

Construction

The project site is located within an identified Air Pollutant Exposure Zone; therefore, the ambient health risk to sensitive receptors from air pollutants is considered substantial. The proposed project would require heavy-duty off-road diesel vehicles and equipment during nine months of the anticipated 16-month construction period. Thus, **Project Mitigation Measure 2, Construction Air Quality** has been identified to implement the portions of Balboa Park PEIR Mitigation Measure AQ-1 related to emissions exhaust by requiring engines with higher emissions standards on construction equipment. **Project**

²⁴ Bay Area Air Quality Management District, *CEQA Air Quality Guidelines*, updated May 2011. See pp. 3-2 to 3-3.

²⁵ Application for Article 38 Compliance Assessment, 755 Ocean Avenue, November 8, 2015.

Mitigation Measure 2, Construction Air Quality would reduce DPM exhaust from construction equipment by 89 to 94 percent compared to uncontrolled construction equipment.²⁶ Therefore, impacts related to construction health risks would be less than significant through implementation of **Project Mitigation Measure 2, Construction Air Quality**. The full text of **Project Mitigation Measure 2, Construction Air Quality** is provided in the Mitigation Measures section below.

Siting New Sources

The proposed project would not be expected to generate 100 trucks per day or 40 refrigerated trucks per day, and would not include a backup diesel generator. Therefore, the proposed project’s truck trips would not exceed screening criteria identified in the California Air Resources Board Air Quality and Land Use Handbook.²⁷ The proposed project would not cause substantial emissions of DPM.

Conclusion

For the above reasons, only the portions of Balboa Park PEIR Mitigation Measure AQ-1 related to emissions exhaust by requiring engines with higher emissions standards on construction equipment are applicable to the proposed project, and the project would not result in significant air quality impacts that were not identified in the PEIR.

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

The Balboa Park PEIR assessed the GHG emissions that could result from rezoning of the area under the three rezoning options. The Balboa Park PEIR at full build-out is anticipated to result in GHG emissions

²⁶ PM emissions benefits are estimated by comparing off-road PM emission standards for Tier 2 with Tier 1 and 0. Tier 0 off-road engines do not have PM emission standards, but the United States Environmental Protection Agency’s *Exhaust and Crankcase Emissions Factors for Nonroad Engine Modeling – Compression Ignition* has estimated Tier 0 engines between 50 hp and 100 hp to have a PM emission factor of 0.72 g/hp-hr and greater than 100 hp to have a PM emission factor of 0.40 g/hp-hr. Therefore, requiring off-road equipment to have at least a Tier 2 engine would result in between a 25 percent and 63 percent reduction in PM emissions, as compared to off-road equipment with Tier 0 or Tier 1 engines. The 25 percent reduction comes from comparing the PM emission standards for off-road engines between 25 hp and 50 hp for Tier 2 (0.45 g/bhp-hr) and Tier 1 (0.60 g/bhp-hr). The 63 percent reduction comes from comparing the PM emission standards for off-road engines above 175 hp for Tier 2 (0.15 g/bhp-hr) and Tier 0 (0.40 g/bhp-hr). In addition to the Tier 2 requirement, ARB Level 3 VDECSs are required and would reduce PM by an additional 85 percent. Therefore, the mitigation measure would result in between an 89 percent (0.0675 g/bhp-hr) and 94 percent (0.0225 g/bhp-hr) reduction in PM emissions, as compared to equipment with Tier 1 (0.60 g/bhp-hr) or Tier 0 engines (0.40 g/bhp-hr).

²⁷ Available online at: <https://www.arb.ca.gov/ch/handbook.pdf>. Accessed on September 14, 2016.

on the order of 36,001 metric tons of CO₂E per year. The PEIR concluded that the resulting GHG emissions from implementing the area plan would be less than significant. No mitigation measures were identified in the PEIR.

The BAAQMD has prepared guidelines and methodologies for analyzing GHGs. These guidelines are consistent with CEQA Guidelines Sections 15064.4 and 15183.5 which address the analysis and determination of significant impacts from a proposed project's GHG emissions and allow for projects that are consistent with an adopted GHG reduction strategy to conclude that the project's GHG impact is less than significant. San Francisco's *Strategies to Address Greenhouse Gas Emissions*²⁸ 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 23.3 percent reduction in GHG emissions in 2012 compared to 1990 levels,²⁹ exceeding the year 2020 reduction goals outlined in the BAAQMD's *2010 Clean Air Plan*,³⁰ Executive Order S-3-05³¹, and Assembly Bill 32 (also known as the Global Warming Solutions Act).^{32,33} In addition, San Francisco's GHG reduction goals are consistent with, or more aggressive than, the long-term goals established under Executive Orders S-3-05³⁴ and B-30-15.^{35,36} 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 proposed project would increase the intensity of use of the site by increasing the size of an existing high school by 16,209 sf (six classrooms) and 160 students. Therefore, the proposed project would contribute to annual long-term increases in GHGs as a result of increased vehicle trips (mobile sources) and school operations that result in an increase in energy use, water use, wastewater treatment, and solid waste disposal. Construction activities would also result in temporary increases in GHG emissions.

The proposed project would be subject to regulations adopted to reduce GHG emissions as identified in the GHG reduction strategy. As discussed below, compliance with the applicable regulations would

²⁸ San Francisco Planning Department, *Strategies to Address Greenhouse Gas Emissions in San Francisco*, November 2010. Available at http://sfmea.sfplanning.org/GHG_Reduction_Strategy.pdf, accessed March 3, 2016.

²⁹ ICF International, *Technical Review of the 2012 Community-wide Inventory for the City and County of San Francisco*, January 21, 2015.

³⁰ Bay Area Air Quality Management District, *Clean Air Plan*, September 2010. Available at <http://www.baaqmd.gov/plans-and-climate/air-quality-plans/current-plans>, accessed March 3, 2016.

³¹ 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.

³² 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.

³³ 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.

³⁴ 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 MTCO₂E); by 2020, reduce emissions to 1990 levels (approximately 427 million MTCO₂E); and by 2050 reduce emissions to 80 percent below 1990 levels (approximately 85 million MTCO₂E).

³⁵ 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.

³⁶ 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.

reduce the project's GHG emissions related to transportation, energy use, waste disposal, any wood burning, and use of refrigerants.

Compliance with the City's Commuter Benefits Program, Emergency Ride Home Program, transportation management programs, Transportation Sustainability Fee, and bicycle parking requirements would reduce the proposed project's transportation-related emissions. These regulations 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.

The proposed project would be required to comply with the energy efficiency requirements of the City's Green Building Code, Stormwater Management Ordinance, Water Conservation and Irrigation ordinances, and Energy Conservation Ordinance, which would promote energy and water efficiency, thereby reducing the proposed project's energy-related GHG emissions.³⁷ Additionally, the project would be required to meet the renewable energy criteria of the Green Building Code, further reducing the project's energy-related GHG emissions.

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 Green Building Code requirements. These regulations reduce the amount of materials sent to a landfill, reducing GHGs emitted by landfill operations. These regulations also promote reuse of materials, conserving their embodied energy³⁸ and reducing the energy required to produce new materials.

Compliance with the City's Street Tree Planting requirements would serve to increase carbon sequestration. Regulations requiring low-emitting finishes would reduce volatile organic compounds (VOCs).³⁹ Thus, the proposed project was determined to be consistent with San Francisco's GHG reduction strategy.⁴⁰

Therefore, 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 the above reasons, the proposed project would not result in significant GHG emissions that were not identified in the Balboa Park PEIR and no mitigation measures are necessary.

³⁷ Compliance with water conservation measures reduce the energy (and GHG emissions) required to convey, pump and treat water required for the project.

³⁸ Embodied energy is the total energy required for the extraction, processing, manufacture and delivery of building materials to the building site.

³⁹ While not a GHG, VOCs are precursor pollutants that form ground level ozone. Increased ground level ozone is an anticipated effect of future global warming that would result in added health effects locally. Reducing VOC emissions would reduce the anticipated local effects of global warming.

⁴⁰ San Francisco Planning Department, *Greenhouse Gas Analysis: Compliance Checklist for Lick Wilmerding High School Campus Expansion & Renovation*, September 15, 2016.

<i>Topics:</i>	<i>Significant Impact Peculiar to Project or Project Site</i>	<i>Significant Impact not Identified in PEIR</i>	<i>Significant Impact due to Substantial New Information</i>	<i>No Significant Impact not Previously Identified in PEIR</i>
9. WIND AND SHADOW—Would the project:				
a) Alter wind in a manner that substantially affects public areas?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Create new shadow in a manner that substantially affects outdoor recreation facilities or other public areas?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Wind

Based upon experience of the Planning Department in reviewing wind analyses and expert opinion on other projects, it is generally (but not always) the case that projects under 80 feet in height do not have the potential to generate significant wind impacts. Although the proposed 40-foot-tall building would be taller than the immediately adjacent buildings, it would be similar in height to existing buildings in the surrounding area. For the above reasons, the proposed project is not anticipated to cause significant impacts related to wind that were not identified in the Balboa Park 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 that shadow would not result in a significant adverse effect on the use of the open space. The Balboa Park PEIR identified possible shading of Balboa Park and new open spaces proposed in the plan area, and determined that these effects would be less than significant.

The proposed project would increase the height of an existing 27-foot-tall building to 40 feet. Since no new structures taller than 40 feet in height would be constructed, no significant shading of nearby parks or open spaces would occur. The proposed project would shade portions of nearby streets and sidewalks and private property at times within the project vicinity. Shadows upon streets and sidewalks would not exceed levels commonly expected in urban areas and would be considered a less-than-significant effect under CEQA. Although occupants of nearby property 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 impact under CEQA.

For the above reasons, the proposed project would not result in significant impacts related to shadow that were not identified in the Balboa Park PEIR.

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

The Balboa Park Initial Study concluded that implementation of the Balboa Park Station Area 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 related to recreational resources were identified in the Balboa Park PEIR.

As the proposed project would not degrade recreational facilities and is within the development projected under the Balboa Park Station Area Plan, there would be no additional impacts on recreation beyond those analyzed in the Balboa Park Initial Study

<u>Topics:</u>	<i>Significant Impact Peculiar to Project or Project Site</i>	<i>Significant Impact not Identified in PEIR</i>	<i>Significant Impact due to Substantial New Information</i>	<i>No Significant Impact not Previously Identified in PEIR</i>
11. UTILITIES AND SERVICE SYSTEMS—Would the project:				
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Have sufficient water supply available to serve the project from existing entitlements and resources, or require new or expanded water supply resources or entitlements?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Result in a determination by the wastewater treatment provider that would serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

<u>Topics:</u>	<i>Significant Impact Peculiar to Project or Project Site</i>	<i>Significant Impact not Identified in PEIR</i>	<i>Significant Impact due to Substantial New Information</i>	<i>No Significant Impact not Previously Identified in PEIR</i>
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Comply with federal, state, and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The Balboa Park Initial Study and PEIR determined that the anticipated increase in population would not result in a significant impact to the provision of water, wastewater collection and treatment, and solid waste collection and disposal. No mitigation measures were identified in the PEIR.

Since certification of the PEIR, the San Francisco Public Utilities Commission (SFPUC) adopted the 2010 Urban Water Management Plan (UWMP) in June 2011. The UWMP update includes city-wide demand projections to the year 2035, compares available water supplies to meet demand and presents water demand management measures to reduce long-term water demand. Additionally, the UWMP update includes a discussion of the conservation requirement set forth in Senate Bill 7 passed in November 2009 mandating a statewide 20% reduction in per capita water use by 2020. The UWMP includes a quantification of the SFPUC's water use reduction targets and plan for meeting these objectives. The UWMP projects sufficient water supply in normal years and a supply shortfall during prolonged droughts. Plans are in place to institute varying degrees of water conservation and rationing as needed in response to severe droughts.

In addition, the SFPUC is in the process of implementing the Sewer System Improvement Program, which is a 20-year, multi-billion dollar citywide upgrade to the City's sewer and stormwater infrastructure to ensure a reliable and seismically safe system. The program includes planned improvements that will serve development in the Balboa Park Station Area Plan area including at the Oceanside Treatment Plant and green infrastructure projects, such as the Holloway Green Street.

As the proposed project is within the development projected under the Balboa Park Station Area Plan, there would be no additional impacts on utilities and service systems beyond those analyzed in the Balboa Park PEIR.

<u>Topics:</u>	<i>Significant Impact Peculiar to Project or Project Site</i>	<i>Significant Impact not Identified in PEIR</i>	<i>Significant Impact due to Substantial New Information</i>	<i>No Significant Impact not Previously Identified in PEIR</i>
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12. PUBLIC SERVICES—Would the project:

a) Result in substantial adverse physical impacts associated with the provision of, or the need for, new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any public services such as fire protection, police protection, schools, parks, or other services?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The Balboa Park Initial Study determined that the anticipated increase in population would not result in a significant impact to public services, including fire protection, police protection, and public schools. No mitigation measures were identified in the Initial Study or the PEIR.

As the proposed project is within the development projected under the Balboa Park Station Area Plan, there would be no additional impacts on public services beyond those analyzed in the Balboa Park PEIR.

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

As discussed in the Balboa Park Initial Study, the Balboa Park Station Area Plan area is in a developed urban environment that does not provide native natural habitat for any rare or endangered plant or animal species. Except for the City College campus, the plan area is nearly completely covered by impervious surfaces. There are no riparian corridors, estuaries, marshes, or wetlands in the Plan Area that could be affected by the development anticipated under the Area Plan. In addition, development envisioned under the Balboa Park Station Area Plan would not substantially interfere with the movement of any resident or migratory wildlife species. For these reasons, the Initial Study concluded that implementation of the Area Plan would not result in significant impacts on biological resources, and no mitigation measures were identified.

The project site is located within the Balboa Park Station Area Plan and therefore, does not support habitat for any candidate, sensitive or special status species. As such, implementation of the proposed project would not result in significant impacts to biological resources not identified in the Balboa Park Initial Study or PEIR.

<u>Topics:</u>	<i>Significant Impact Peculiar to Project or Project Site</i>	<i>Significant Impact not Identified in PEIR</i>	<i>Significant Impact due to Substantial New Information</i>	<i>No Significant Impact not Previously Identified in PEIR</i>
14. GEOLOGY AND SOILS—Would the project:				
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? (Refer to Division of Mines and Geology Special Publication 42.)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Be located on geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code, creating substantial risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Change substantially the topography or any unique geologic or physical features of the site?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The Balboa Park Initial Study determined that compliance with applicable codes and recommendations made in project-specific geotechnical analyses would not eliminate earthquake risks, but would reduce them to an acceptable level, given the seismically active characteristics of the Bay Area. Thus, the Initial Study concluded that implementation of the plan would not result in significant impacts with regard to geology, and no mitigation measures were identified in the Initial Study or the PEIR.

A geotechnical investigation was prepared for the proposed project.⁴¹ The report found that the proposed project could be supported by conventional spread footings, and that excavation up to 14 feet below grade would be required for foundation construction. The report recommended that shoring be used to protect areas of excavation, and that underpinning may be necessary to support the adjacent gymnasium and auditorium buildings during construction. The report indicated that dewatering may also be needed during excavation, but would be unlikely to induce ground settlement given that the site is underlain by sandstone bedrock.

The project is required to conform to the San Francisco Building Code, which ensures the safety of all new construction in the City. DBI will review the project-specific geotechnical report during its review of the building permit for the project. In addition, DBI may require additional site specific soils report(s) through the building permit application process, as needed. The DBI requirement for a geotechnical report and review of the building permit application pursuant to DBI's implementation of the Building Code would ensure that the proposed project would have no significant impacts related to soils, seismic or other geological hazards.

In light of the above, the proposed project would not result in a significant effect related to seismic and geologic hazards. Therefore, the proposed project would not result in significant impacts related to geology and soils that were not identified in the Balboa Park Initial Study, and no mitigation measures are necessary.

<u>Topics:</u>	<i>Significant Impact Peculiar to Project or Project Site</i>	<i>Significant Impact not Identified in PEIR</i>	<i>Significant Impact due to Substantial New Information</i>	<i>No Significant Impact not Previously Identified in PEIR</i>
15. HYDROLOGY AND WATER QUALITY—Would the project:				
a) Violate any water quality standards or waste discharge requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner that would result in substantial erosion or siltation on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

⁴¹ Rockridge Geotechnical, *Geotechnical Investigation – Proposed Renovation of Administration and Classroom Building – Lick-Wilmerding High School*, August 26, 2016.

<i>Topics:</i>	<i>Significant Impact Peculiar to Project or Project Site</i>	<i>Significant Impact not Identified in PEIR</i>	<i>Significant Impact due to Substantial New Information</i>	<i>No Significant Impact not Previously Identified in PEIR</i>
e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Otherwise substantially degrade water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other authoritative flood hazard delineation map?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h) Place within a 100-year flood hazard area structures that would impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
j) Expose people or structures to a significant risk of loss, injury or death involving inundation by seiche, tsunami, or mudflow?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The Balboa Park PEIR determined that the anticipated increase in population would not result in a significant impact on 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 proposed project would increase the height of an existing school building, but would not expand its footprint on the project site. Proposed streetscape changes, such as the addition of a sidewalk bulb-out, would occur in areas that are already paved. Therefore, the proposed project would not change the amount of impervious surface coverage on the project site. As a result, the proposed project would not increase stormwater runoff.

Therefore, the proposed project would not result in any significant impacts related to hydrology and water quality that were not identified in the Balboa Park PEIR.

<i>Topics:</i>	<i>Significant Impact Peculiar to Project or Project Site</i>	<i>Significant Impact not Identified in PEIR</i>	<i>Significant Impact due to Substantial New Information</i>	<i>No Significant Impact not Previously Identified in PEIR</i>
16. HAZARDS AND HAZARDOUS MATERIALS—Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

<u>Topics:</u>	<i>Significant Impact Peculiar to Project or Project Site</i>	<i>Significant Impact not Identified in PEIR</i>	<i>Significant Impact due to Substantial New Information</i>	<i>No Significant Impact not Previously Identified in PEIR</i>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h) Expose people or structures to a significant risk of loss, injury, or death involving fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The Balboa Park Initial Study noted that implementation of the Balboa Park Station Area Plan would encourage construction of new development within the project area. The Initial Study found that the potential exists to encounter hazardous materials during construction activities in many parts of the project area because of the presence of naturally-occurring asbestos, previous and current land uses associated with the use of hazardous materials, and known or suspected hazardous materials cleanup cases.

Hazardous Building Materials

The Balboa Park Initial Study determined that future development in the Plan Area may involve demolition or renovation of existing structures containing hazardous building materials. Some building materials commonly used in older buildings could present a public health risk if disturbed during an accident or during demolition or renovation of an existing building. Hazardous building materials addressed in the Initial Study include asbestos, electrical equipment such as transformers and fluorescent light ballasts that contain PCBs or di (2 ethylhexyl) phthalate (DEHP), fluorescent lights containing mercury vapors, and lead-based paints. Asbestos and lead based paint may also present a health risk to existing building occupants if they are in a deteriorated condition. If removed during demolition of a building, these materials would also require special disposal procedures. The Balboa Park Initial Study identified a significant impact associated with hazardous building materials including PCBs, DEHP, and mercury and determined that that PEIR Mitigation Measure HM-2: Hazardous Building Materials, as outlined below, would reduce effects to a less-than-significant level. Because the proposed development includes demolition of an existing building, PEIR Mitigation Measure HM-2 would apply to the proposed project. The project sponsor has agreed to implement PEIR Mitigation Measure HM-2 as **Project**

Mitigation Measure 3, Hazardous Building Materials. The full text of the measure is provided in the Mitigation Measures section below.

Soil and Groundwater Contamination

The Initial Study found that existing regulations for facility closure, underground storage tank (UST) closure, and investigation and cleanup of soil and groundwater would help protect workers and the community from exposure to hazardous materials during construction. The Initial Study also included PEIR Mitigation Measure HM-1, which requires a Phase I Environmental Site Assessment to be prepared, and requires clean-up of any identified soil or groundwater contamination. Since certification of the PEIR, Article 22A of the Health Code, also known as the Maher Ordinance, was expanded to include properties throughout the City where there is potential to encounter hazardous materials, primarily industrial zoning districts, sites with industrial uses or underground storage tanks, sites with historic bay fill, and sites in close proximity to freeways or underground storage tanks. The over-arching goal of the Maher Ordinance is to protect public health and safety by requiring appropriate handling, treatment, disposal and when necessary, remediation of contaminated soils that are encountered in the building construction process. Projects that disturb 50 cubic yards or more of soil that are located on sites with potentially hazardous soil or groundwater within Balboa Park Station Area Plan area are subject to this ordinance.

The proposed project would include approximately 1,515 cubic yards of excavation on a site with known prior industrial use (welding and repair). Therefore, the project is subject to Article 22A of the Health Code, also known as the Maher Ordinance, which is administered and overseen by the Department of Public Health (DPH). The Maher Ordinance requires the project sponsor to retain the services of a qualified professional to prepare a Phase I Environmental Site Assessment (ESA) that meets the requirements of Health Code Section 22.A.6.

The Phase I ESA would determine the potential for site contamination and level of exposure risk associated with the project. Based on that information, the project sponsor may be required to conduct soil and/or groundwater sampling and analysis. Where such analysis reveals the presence of hazardous substances in excess of state or federal standards, the project sponsor is required to submit a site mitigation plan (SMP) to the DPH or other appropriate state or federal agency(ies), and to remediate any site contamination in accordance with an approved SMP prior to the issuance of any building permit. Article 22A of the Health Code therefore supersedes the requirements of PEIR Mitigation Measure HM-1.

In compliance with the Maher Ordinance, the project sponsor has submitted a Maher Application to DPH and a Phase I ESA has been prepared to assess the potential for site contamination.⁴² The project site is not on any lists of hazardous waste properties enumerated under Section 659623.5 of the California Government Code. No underground fuel storage tanks are located on the project site. Based on construction drawings from 1955-1956, two disused underground fuel oil tanks are likely located underneath the Ocean Avenue sidewalk, with supply and return lines extending to the boiler room on the project site. Prior soil borings indicated petroleum hydrocarbons and lead at low concentrations. Other hazardous materials are stored and used in small quantities in classrooms, such as the science labs and woodworking shops. The Phase I ESA recommended further investigation of the potential underground fuel tanks.

⁴² Geoterren Environmental Services, *Phase I Environmental Site Assessment, Lick Wilmerding High School, 755 Ocean Avenue*, February 13, 2016.

The proposed project would be required to remediate any potential soil and groundwater contamination described above in accordance with Article 22A of the Health Code. Therefore, the proposed project would not result in any significant impacts related to hazardous materials that were not identified in the Balboa Park Initial Study or PEIR.

Naturally Occurring Asbestos

The Balboa Park Initial Study identified the potential for excavation associated with development projects under the Balboa Park Station Area Plan to disturb naturally occurring asbestos (serpentine) known to exist in the area. Because asbestos poses a hazard when it becomes airborne, the Initial Study included PEIR Mitigation Measure HM-3, which would require each development project contractor to assess the potential for the presence of naturally-occurring asbestos in the soil or rock to be excavated and implement necessary abatement measures in accordance with the Asbestos Airborne Toxic Control Measure for Construction, Grating, Quarrying, and Surface Mining Operations (ATCM). The project sponsor has agreed to implement PEIR Mitigation Measure HM-3 as **Project Mitigation Measure 4, Naturally Occurring Asbestos**. The full text of the measure is provided in the Mitigation Measures section below.

The ATCM was signed into state law on July 2001 by the ARB, and then became effective in the BAAQMD region on November 19, 2002. The requirements established by ARB are contained in California Code of Regulations (CCR) Title 17, Section 93105 (ARB, 2002c) and are implemented within the district by BAAQMD. Areas that contain naturally occurring asbestos are mapped by the California Department of Conservation, Division of Mines and Geology and are available to the public (DOC, 2000). The ATCM requires road construction and maintenance activities, construction and grading operations, and quarrying and surface mining operations in areas where NOA is likely to be found to employ best available dust mitigation measures. The project site is not located within a mapped area, and therefore is not likely to contain naturally occurring asbestos and is not subject to the ATCM mitigation requirements. Neither the Geotechnical Investigation or the Phase I ESA prepared for the proposed project, in accordance with PEIR Mitigation Measure HM-3 (**Project Mitigation Measure 4**) found any naturally occurring asbestos on the project site.⁴³

San Francisco Health Code Article 22B and San Francisco Building Code Section 106.A.3.2.6, collectively the Construction Dust Control Ordinance, require that all site preparation work, demolition, or other construction activities within San Francisco that have the potential to create dust or to expose or disturb more than 10 cubic yards or 500 sf of soil comply with specified dust control measures whether or not the activity requires a permit from DBI. The Director of DBI may waive this requirement for activities on sites less than one-half acre that are unlikely to result in any visible wind-blown dust. The project sponsor and the contractor responsible for construction activities at the project site are required to implement the following practices to control construction dust on the site or other practices that result in equivalent dust control that are acceptable to the Director of DBI. Dust suppression activities may include:

- Watering all active construction areas sufficiently to prevent dust from becoming airborne;

⁴³ Rockridge Geotechnical, *Geotechnical Investigation – Proposed Renovation of Administration and Classroom Building – Lick-Wilmerding High School*, August 26, 2016.

- Increased watering frequency may be necessary whenever wind speeds exceed 15 miles per hour. Reclaimed water must be used if required by Article 21, Section 1100 et seq. of the San Francisco Public Works Code. If not required, reclaimed water should be used whenever possible;
- Contractors will provide as much water as necessary to control dust (without creating runoff in any area of land clearing, and/or earth movement);
- During excavation and dirt-moving activities, contractors will wet sweep or vacuum the streets, sidewalks, paths and intersections where work is in progress at the end of the workday;
- Inactive stockpiles (where no disturbance occurs for more than seven days) greater than 10 cubic yards or 500 sf of excavated materials, backfill material, import material, gravel, sand, road base, and soil will be covered with a 10-millimeter (0.01-inch) polyethylene plastic (or equivalent) tarp, braced down, or use other equivalent soil stabilization techniques;
- Additionally, contractors will use dust enclosures, curtains, and dust collectors as necessary to control dust in the excavation area.

The requirements of Construction Dust Control Ordinance would further ensure that naturally occurring asbestos does not become airborne during construction. Therefore, the proposed project would not result in any significant impacts related to hazardous materials that were not identified in the Balboa Park Initial Study or PEIR.

For the above reasons, the proposed project would not result in significant impacts related to hazards or hazardous materials that were not identified in the Balboa Park PEIR.

<u>Topics:</u>	<i>Significant Impact Peculiar to Project or Project Site</i>	<i>Significant Impact not Identified in PEIR</i>	<i>Significant Impact due to Substantial New Information</i>	<i>No Significant Impact not Previously Identified in PEIR</i>
17. MINERAL AND ENERGY RESOURCES—Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Encourage activities which result in the use of large amounts of fuel, water, or energy, or use these in a wasteful manner?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The Balboa Park Initial Study determined that the Balboa Park Station Area Plan would facilitate the construction of both new residential units and commercial buildings. Development of these uses would not result in use of large amounts of fuel, water, or energy in a wasteful manner or 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 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 Balboa Park Initial Study concluded that implementation of the Balboa Park Station Area Plan would not result in a significant impact on mineral and energy resources. No mitigation measures were identified in the Initial Study.

As the proposed project is within the development projected under the Balboa Park Station Area Plan, there would be no additional impacts on mineral and energy resources beyond those analyzed in the Balboa Park Initial Study or PEIR.

<i>Topics:</i>	<i>Significant Impact Peculiar to Project or Project Site</i>	<i>Significant Impact not Identified in PEIR</i>	<i>Significant Impact due to Substantial New Information</i>	<i>No Significant Impact not Previously Identified in PEIR</i>
18. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)) or timberland (as defined by Public Resources Code Section 4526)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The Balboa Park PEIR determined that no agricultural resources exist in the Area Plan; therefore the rezoning and community plans would have no effect on agricultural resources. No mitigation measures were identified in the PEIR. The Balboa Park PEIR did not analyze the effects on forest resources.

As the proposed project is within the development projected under the Balboa Park Station Area Plan, there would be no additional impacts on agriculture and forest resources beyond those analyzed in the Balboa Park PEIR.

MITIGATION MEASURES

Project Mitigation Measure 1 – Archeological Monitoring (implementing PEIR Mitigation Measure AM-2)

AM-2 applies to any project involving any soils-disturbing activities greater than 10 feet in depth, including excavation, installation of foundations or utilities or soils remediation, and to any soils-disturbing project of any depth within the Phelan Loop and Kragen Auto Parts Sites, the east side of San Jose between Ocean and Geneva Avenues, and the Upper Yard Parcel.

Based on the reasonable potential that archeological resources may be present within the Project Area, the following measures shall be undertaken to avoid any potentially significant adverse effect from the proposed project on buried historical resources. The project sponsor of a development project under the Balboa Park Station Area Plan shall retain the services of a qualified archeological consultant having expertise in California prehistoric and urban historical archeology. The archeological consultant shall undertake an archeological monitoring program. All plans and reports prepared by the consultant as specified herein shall be submitted first and directly to the ERO for review and comment, and shall be considered draft reports subject to revision until final approval by the ERO. Archeological monitoring and/or data recovery programs required by this measure could suspend construction of the project for up to a maximum of four weeks. At the direction of the ERO, the suspension of construction can be extended beyond four weeks only if such a suspension is the only feasible means to reduce the potential effects on a significant archeological resource as defined in CEQA Guidelines Sect. 15064.5 (a)(c), to a less-than-significant level.

Archeological monitoring program (AMP). The archeological monitoring program shall minimally include the following provisions:

- The archeological consultant, project sponsor of a development project under the Balboa Park Station Area Plan, and ERO shall meet and consult on the scope of the AMP reasonably prior to any project-related soils disturbing activities commencing. The ERO in consultation with the project archeologist shall determine what project activities shall be archeologically monitored. In most cases, any soils disturbing activities, such as demolition, foundation removal, excavation, grading, utilities installation, foundation work, driving of piles (foundation, shoring, etc.), site remediation, etc., shall require archeological monitoring because of the potential risk these activities pose to archaeological resources and to their depositional context;
- The archeological consultant shall advise all project contractors to be on the alert for evidence of the presence of the expected resource(s), of how to identify the evidence of the expected resource(s), and of the appropriate protocol in the event of apparent discovery of an archeological resource;
- The archaeological monitor(s) shall be present on the project site according to a schedule agreed upon by the archeological consultant and the ERO until the ERO has, in consultation with the archeological consultant, determined that project construction activities could have no effects on significant archeological deposits;
- The archeological monitor shall record and be authorized to collect soil samples and artifactual/ecofactual material as warranted for analysis;
- If an intact archeological deposit is encountered, all soils disturbing activities in the vicinity of the deposit shall cease. The archeological monitor shall be empowered to temporarily redirect demolition/excavation/pile driving/construction crews and heavy equipment until the deposit is evaluated. If in the case of pile driving activity (foundation, shoring, etc.), the archeological monitor has cause to believe that the pile driving activity may affect an archeological resource, the pile driving activity shall be terminated until an appropriate evaluation of the resource has been made in consultation with the ERO. The archeological consultant shall immediately notify

the ERO of the encountered archeological deposit. The archeological consultant shall, after making a reasonable effort to assess the identity, integrity, and significance of the encountered archeological deposit, present the findings of this assessment to the ERO.

If the ERO in consultation with the archeological consultant determines that a significant archeological resource is present and that the resource could be adversely affected by the proposed project, at the discretion of the project sponsor either:

- A) The proposed project shall be re-designed so as to avoid any adverse effect on the significant archeological resource; or
- B) An archeological data recovery program shall be implemented, unless the ERO determines that the archeological resource is of greater interpretive than research significance and that interpretive use of the resource is feasible.

If an archeological data recovery program is required by the ERO, the archeological data recovery program shall be conducted in accord with an archeological data recovery plan (ADRP). The project archeological consultant, project sponsor, and ERO shall meet and consult on the scope of the ADRP. The archeological consultant shall prepare a draft ADRP that shall be submitted to the ERO for review and approval. The ADRP shall identify how the proposed data recovery program will preserve the significant information the archeological resource is expected to contain. That is, the ADRP will identify what scientific/historical research questions are applicable to the expected resource, what data classes the resource is expected to possess, and how the expected data classes would address the applicable research questions. Data recovery, in general, should be limited to the portions of the historical property that could be adversely affected by the proposed project. Destructive data recovery methods shall not be applied to portions of the archeological resources if nondestructive methods are practical.

The scope of the ADRP shall include the following elements:

- Field Methods and Procedures. Descriptions of proposed field strategies, procedures, and operations.
- Cataloguing and Laboratory Analysis. Description of selected cataloguing system and artifact analysis procedures.
- Discard and Deaccession Policy. Description of and rationale for field and post-field discard and deaccession policies.
- Interpretive Program. Consideration of an on-site/off-site public interpretive program during the course of the archeological data recovery program.
- Security Measures. Recommended security measures to protect the archeological resource from vandalism, looting, and non-intentionally damaging activities.
- Final Report. Description of proposed report format and distribution of results.

Curation. Description of the procedures and recommendations for the curation of any recovered data having potential research value, identification of appropriate curation facilities, and a summary of the accession policies of the curation facilities.

Human Remains, Associated or Unassociated Funerary Objects. The treatment of human remains and of associated or unassociated funerary objects discovered during any soils disturbing activity shall comply with applicable State and Federal Laws, including immediate notification of the Coroner of the City and County of San Francisco and in the event of the Coroner's determination that the human remains are

Native American remains, notification of the California State Native American Heritage Commission (NAHC) who shall appoint a Most Likely Descendant (MLD) (Pub. Res. Code Sec. 5097.98). The archeological consultant, project sponsor, and MLD shall make all reasonable efforts to develop an agreement for the treatment of, with appropriate dignity, human remains and associated or unassociated funerary objects (CEQA Guidelines. Sec. 15064.5(d)). The agreement should take into consideration the appropriate excavation, removal, recordation, analysis, curation, possession, and final disposition of the human remains and associated or unassociated funerary objects.

Final Archeological Resources Report. The archeological consultant shall submit a Draft Final Archeological Resources Report (FARR) to the ERO that evaluates the historical significance of any discovered archeological resource and describes the archeological and historical research methods employed in the archeological testing/monitoring/data recovery program(s) undertaken. Information that may put at risk any archeological resource shall be provided in a separate removable insert within the draft 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 Major Environmental Analysis division of the Planning Department shall receive three copies 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 – Construction Air Quality (implementing PEIR Mitigation Measure AQ-1)

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 or designee (ERO) may waive the alternative source of power requirement of Subsection (A)(2) if an alternative source of power is limited or infeasible at the project site. If the ERO grants the waiver, the Contractor must submit documentation that the equipment used for onsite power generation meets the requirements of Subsection (A)(1).
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 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 3 – Hazardous Building Materials (implementing PEIR Mitigation Measure HM-2)

For projects that include demolition, ensure that any equipment containing PCBs or DEHP, 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 or demolition, and that any fluorescent light tubes, which could contain mercury, are similarly removed and properly disposed of. Any other hazardous materials identified, such as asbestos-containing building materials, either before or during work, shall be abated according to applicable federal, state, and local laws.

Project Mitigation Measure 4 – Naturally Occurring Asbestos (implementing PEIR Mitigation Measure HM-3)

The project sponsor(s) of future development in the Project Area that propose excavation shall evaluate the potential for naturally occurring asbestos to be present in soil or rock that would be excavated for the proposed development. Should naturally occurring asbestos be identified, the project sponsor shall comply with the legal requirements of the asbestos ATCM.

IMPROVEMENT MEASURES

Project Improvement Measure 1 – TDM Coordinator

The school could identify a TDM coordinator for the project site; this role would be filled by the Facilities Manager. The TDM coordinator could be responsible for oversight and implementation of the measures set forth in this plan, as well as for monitoring and updating the plan as needed. Implementation responsibilities may include general promotional activities, benefit administration (in the case that commuter benefits are provided to staff), ensuring that transit schedules are available, maintaining updated web links to transit providers on the school web portal, assisting students in registering clipper cards, and other day-to-day transportation monitoring tasks.

The TDM Coordinator could also be responsible for setting modal split goals (percentage of students and faculty arriving via car, transit, bike, walk, etc.) for the school. Progress toward these goals could be monitored through periodic surveys of students, parents and staff to determine travel patterns and barriers to use of non-auto modes.

Project Improvement Measure 2 – TDM Data Collection Access

The school could provide access to City staff for any ongoing efforts to quantify the efficacy of TDM measures. This may include allowing City staff to access the project site to perform trip counts, intercept surveys, and/or other types of data collection, as arranged through the TDM Coordinator.

Project Improvement Measure 3 – Provide Information on Active Transportation Routes to/from School Site

The school could provide to all students, information regarding pedestrian and bike facilities leading from the school site to common destinations. This may include maps designating preferred pedestrian or bike routes to/from the school, maps indicating where City-provided bike facilities are present, and maps for walking or biking to common destinations, such as the Balboa Park BART station. Information could be distributed as deemed appropriate by the TDM Coordinator, through pamphlets or provision in the student handbook.

Project Improvement Measure 4 – Encourage Carpooling

The school could implement a suite of strategies that allow guardians to find other families for carpool matching. Strategies could include promoting official ride-match sites, using an online parent portal to encourage carpooling, distributing school directories, and promoting ride-matching on the appropriate social media outlets. The school could register with the City's formal SchoolPool program to aid in carpool formation. To encourage carpooling among faculty and staff, the school could consider designating parking spaces as carpool-only spaces, and encourage employees to register for 511.org's carpool matching system.

Project Improvement Measure 5 – Participate In Local and Regional Transit Programs

The school could promote the presence of special student fares on public transit in order to encourage families to use transit. These programs include discounted youth or student fares on Muni bus and rail

and BART. This measure also includes assistance for students in registering for a Youth Clipper card and Youth BART tickets, which requires a special process and documentation. The school could also continue to provide pre-tax transportation benefits to its employees, including all faculty and staff.

Project Improvement Measure 6 – Emergency Ride Home Program

The school has agreed to register for the Emergency Ride Home program, for which all San Francisco companies are eligible, and provides a ride home in case of a personal or family emergency to all employees using a sustainable mode of travel to work. Once registered, all school employees could be eligible to request reimbursement for the ride.

Project Improvement Measure 7 – Passenger Loading Plan

The school could have at least one staff member in front of the school's main entrance (on Geneva Avenue during project construction and on Ocean Avenue during project operation) directing students and vehicles during the drop-off and pick-up periods, as needed. Staff could hold a sign that communicates to drivers to move forward, ensuring that drivers do not double park or obstruct the bus stop or the red curb fire hydrant zone on Ocean Avenue. The school could post additional signs to help facilitate drop-off and pick-up operations. A large sign stating, "Passenger Loading Zone between 8:00 AM and 9:00 AM and 3:00 PM and 6:00 PM," may help discourage drivers from parking in the loading zone during passenger loading hours. The sign(s) should be placed on Geneva Avenue during construction, and on Howth Street and Ocean Avenue during operation, a few hours prior to the start of the loading period and be removed at the start of dismissal. The school could monitor traffic patterns at the campus, and adjust the pick-up and drop-off program as necessary in order to prevent double-parking, bus stop blockages, or driveway blockages due to loading activity. If queues recurrently block the travel lane on Ocean Avenue, or cause other circulation impediments, the school should employ abatement methods as needed to abate the queue. Methods to abate the queue could include but are not limited to, providing an additional passenger loading zone on Geneva Avenue, extending the passenger loading zone on Howth Street, and implementing additional TDM strategies.

During construction, the school could apply the same passenger loading management strategies as described above, including posting signs and having a staff member by the school's temporary passenger loading zone located in front of the Geneva Avenue entrance to help facilitate drop-off and pick-up operations.

In addition, information regarding the pick-up and drop-off procedures could be provided to all families by the TDM coordinator via email, pamphlet, flyer, or on the school website at the beginning and middle of each school year. The TDM Coordinator could also keep a log of complaints from neighbors regarding school circulation and monitor the program as necessary to ensure that loading operations proceed smoothly.