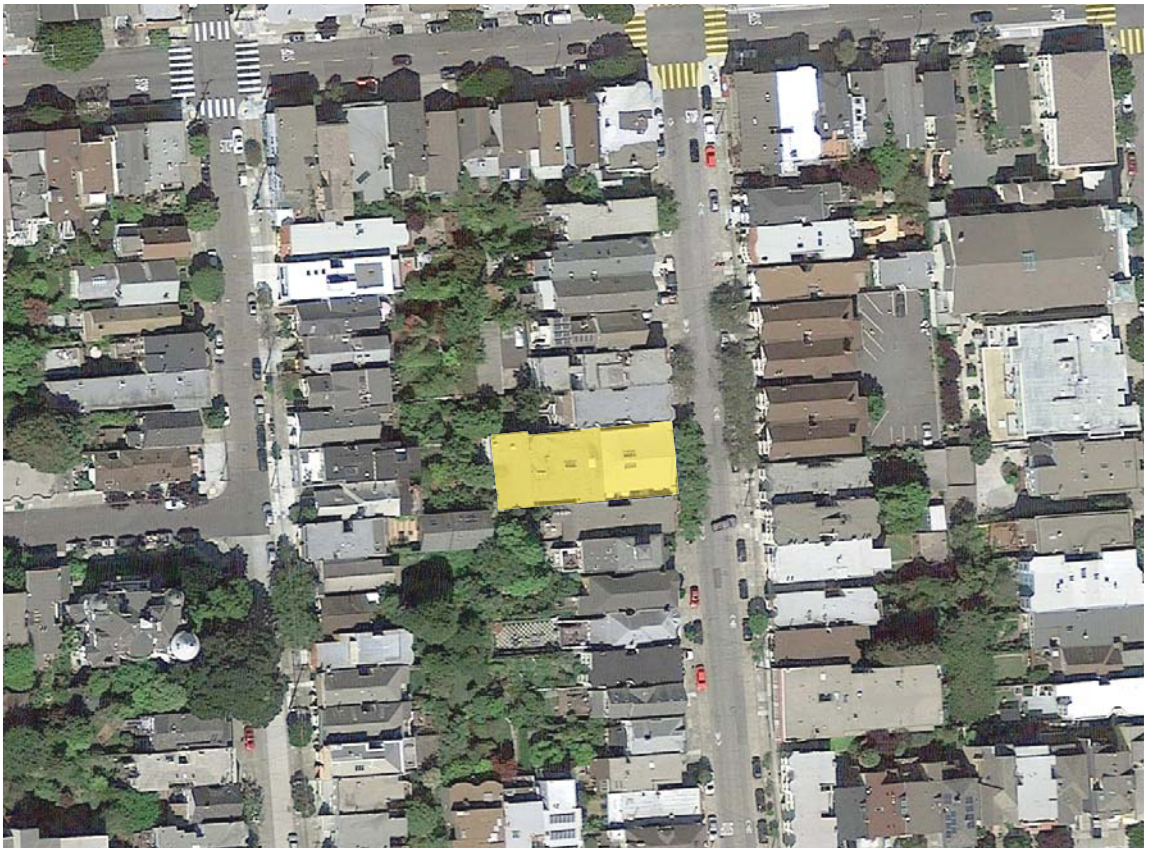


DEIR



DRAFT ENVIRONMENTAL IMPACT REPORT

150 Eureka Street Project

PLANNING DEPARTMENT
CASE NO. 2015.011274ENV

STATE CLEARINGHOUSE NO. 2017052068



**SAN FRANCISCO
PLANNING
DEPARTMENT**

Draft EIR Publication Date:	DECEMBER 6, 2017
Draft EIR Public Hearing Date:	JANUARY 18, 2018
Draft EIR Public Comment Period:	DECEMBER 6, 2017 - JANUARY 23, 2018

Written comments should be sent to:

Jenny Delumo, Environmental Planner | 1650 Mission Street, Suite 400 | San Francisco, CA 94103
or jenny.delumo@sfgov.org

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SAN FRANCISCO PLANNING DEPARTMENT

DATE: December 6, 2017
TO: Distribution List for the 150 Eureka Street Project draft EIR
FROM: Lisa Gibson, Environmental Review Officer
SUBJECT: Request for the Final Environmental Impact Report for the 150 Eureka Street Project (Planning Department File No. 2015-011274ENV)

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

Reception:
415.558.6378

Fax:
415.558.6409

Planning
Information:
415.558.6377

This is the draft of the environmental impact report (EIR) for the 150 Eureka Street Project. A public hearing will be held on the adequacy and accuracy of this document. After the public hearing, our office will prepare and publish a document titled "Responses to Comments," which will contain a summary of all relevant comments on this draft EIR and our responses to those comments. It may also specify changes to this draft EIR. Those who testify at the hearing on the draft EIR will automatically receive a copy of the responses to comments document, along with notice of the date reserved for certification; others may receive a copy of the responses to comments and notice by request or by visiting our office. This draft EIR together with the responses to comments document will be considered by the planning commission in an advertised public meeting and will be certified as a final EIR if deemed adequate.

After certification, the draft EIR and the Responses to Comments document will be considered the final EIR. The final EIR will add no new information to the combination of the two documents. Therefore, if you receive a copy of the responses to comments document in addition to this copy of the draft EIR, you will have a copy of the final EIR.

Thank you for your interest in this project.

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ACRONYMS AND ABBREVIATIONS

HRE	Historic Resource Evaluation, 150 Eureka Street
HRER	Historic Resource Evaluation Response, 150 Eureka Street
ABAG	Association of Bay Area Governments
ALGA	Association of Lesbian and Gay Asians
BAAQMD	Bay Area Air Quality Management District
CCR	California Code of Regulations
CEQA	California Environmental Quality Act
Citywide LGBTQ HCS	Citywide Historic Context Statement for LGBTQ History in San Francisco
CRH	Council on Religion and the Homosexual
CRHR	California Register of Historic Resources
DBI	San Francisco Department of Building Inspection
DPH	San Francisco Department of Public Health
EIR	Environmental Impact Report
general plan	San Francisco General Plan
gsf	gross square feet
Heritage	San Francisco Architectural Heritage
LGBTQ	Lesbian, Gay, Bisexual, Transgender, Queer
MCC	Metropolitan Community Church
MMRP	Mitigation Monitoring and Reporting Program
Muni	San Francisco Municipal Railway
NRHP	National Register of Historic Places
NOP/IS	Notice of Preparation/Initial Study
planning code	San Francisco Planning Code
planning department	San Francisco Planning Department
PRC	Public Resources Code
RH-2	Residential House, Two-Family
SFMTA	San Francisco Municipal Transportation Agency
SFPW	San Francisco Public Works

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SUMMARY

INTRODUCTION

This document is a draft environmental impact report (EIR) for the proposed 150 Eureka Street Project (proposed project). This chapter of the EIR provides a summary of the project, a summary of anticipated environmental impacts of the project and identified mitigation measures; areas of controversy to be resolved; a summary of alternatives; and an identification of the environmentally superior alternative. The project sponsor, 150 Eureka Street LLC, proposes to redevelop an approximately 6,246-square-foot parcel located at 150 Eureka Street in San Francisco's Castro/Upper Market neighborhood.

PROJECT SUMMARY

The proposed project would demolish the existing building on the site, split the existing lot into two lots, and construct two, four-story buildings with a total of four residential units and eight off-street parking spaces within a total building area of approximately 14,441 gross square feet (gsf). Each building would be a maximum of 40 feet tall. Landscaping is proposed along the building frontage on Eureka Street. In addition, an approximately 1,116-gsf rear yard and an approximately 263-gsf penthouse deck would provide on-site open space for use by project residents. Chapter II, Project Description, pp. 13–32, provides a detailed description of the proposed project.

PROJECT SPONSOR'S OBJECTIVES

1. Re-develop a large underutilized site with high-quality, sustainable, and economically feasible family-sized three- and four-bedroom residential dwellings, including off-street parking, within the existing density designation for the site, in order to help meet projected City housing needs and also introduce new midblock open space where none currently exists at the rear of the site.

2. Develop a project that achieves high-quality urban design and sustainability standards, is sensitive to and compatible with its surroundings, and enhances the existing urban design character of the area.
3. Build residential units on the site to contribute to the City's General Plan Housing Element goals and the Association of Bay Area Governments (ABAG) Regional Housing Needs Allocation for the City and County of San Francisco.
4. Provide a new midblock open space that will enhance the quality of life for the project's residents and neighbors.
5. Construct a high-quality project that will produce a reasonable return on investment for the project sponsor and its investors and will be able to attract investment capital and construction financing.

SUMMARY OF IMPACTS AND MITIGATION MEASURES

This EIR analyzes the potential environmental effects of the proposed project, as identified in the Notice of Preparation (NOP) of an EIR, issued May 24, 2017 (Appendix A of this EIR). The Initial Study (IS) attached to the NOP (also included in Appendix A) found that the proposed project could have potentially significant environmental effects related to historic architectural resources. Impacts in the following areas would be less than significant (some with the mitigation measures identified in the NOP/IS) and are not further evaluated in this EIR: land use and land use planning; population and housing; archeological and tribal resources; transportation and circulation; noise; air quality; greenhouse gas emissions; wind and shadow; recreation; utilities and service systems; public services; biological resources; geology and soils; hydrology and water quality; hazards and hazardous materials; mineral and energy resources; and agriculture and forest resources.

This summary provides an overview of the analysis contained in Chapter IV, Environmental Setting, Impacts and Mitigation Measures, pp. 41–92. Impacts are categorized by type of impact as follows:

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

As identified in Section IV.A, Historic Architectural Resources, pp. 49–90, under **Impact CP-1**, demolition of the 150 Eureka Street building under the proposed project would result in a significant and unavoidable impact to the individual historic architectural resource at 150 Eureka Street, which is identified as a historical resource under the California Environmental Quality Act (CEQA).

Implementation of **Mitigation Measures M-CR-1a: Documentation** and **M-CR-1b: Interpretive Program** would reduce this adverse impact on the historical resource, but not to a less-than-significant level. There is no feasible mitigation measure that could avoid this project-related historic architectural resource impact. Therefore, the impact to the historic resource on the project site would remain significant and unavoidable. As stated in **Impact C-CR-1**, implementation of the proposed project would not result in significant cumulative impacts to historic architectural resources.

Table S-1 identifies the impacts and mitigation measures for the proposed project that are identified in this draft EIR. **Table S-2** identifies the impacts and mitigation measures for the proposed project that are identified in the NOP/IS (included as Appendix A). The information in the tables is organized to correspond with environmental issues discussed in Chapter IV, Environmental Setting, Impacts and Mitigation Measures, pp. 41–90, of this draft EIR and the NOP/IS (Appendix A). The table is arranged in four columns: (1) impacts; (2) level of significance prior to mitigation measures (if applicable); (3) mitigation measures (if applicable); and (4) level of significance after mitigation (if applicable). For a complete description of potential impacts and recommended mitigation measures, please refer to the topical section in Chapter IV and in the NOP/IS.

Table S-1: Summary of Impacts, Mitigation Measures and Improvement Measures Identified in the EIR

Environmental Impacts	Level of Significance Without Mitigation	Mitigation/Improvement Measures	Level of Significance With Mitigation
Historic Architectural Resources			
<u>CR-1</u> : The demolition of the Metropolitan Community Church Building located at 150 Eureka Street would result in a substantial adverse change to the significance of an individual historical architectural resource as defined by CEQA Guidelines section 15064.5(b).	Significant	<p>M-CR-1a: Documentation. Prior to the issuance of demolition or site permits, the project sponsor shall undertake Historic American Building Survey (HABS) documentation of the subject property, structures, objects, materials, and landscaping. The documentation shall be funded by the project sponsor and undertaken by a qualified professional who meets the standards for history, architectural history, or architecture (as appropriate), as set forth by the Secretary of the Interior's <i>Professional Qualification Standards</i> (36 CFR, Part 61). The documentation shall consist of the following:</p> <ul style="list-style-type: none"> • <i>Measured Drawings</i>: A set of measured drawings that depict the existing size, scale, and dimension of the subject property. The planning department preservation staff will accept the original architectural drawings or an as-built set of architectural drawings (plan, section, elevation, etc.). The planning department preservation staff will assist the consultant in determining the appropriate level of measured drawings; • <i>HABS-Level Photography</i>: Digital photographs of the interior and the exterior of subject property. Large format negatives are not required. The scope of the digital photographs shall be reviewed by planning department preservation staff for concurrence, and all digital photography shall be conducted according to the latest National Park Service Standards. The photography shall be undertaken by a qualified professional with demonstrated experience in HABS photography; and 	Significant and Unavoidable

Table S-1: Summary of Impacts, Mitigation Measures and Improvement Measures Identified in the EIR

Environmental Impacts	Level of Significance Without Mitigation	Mitigation/Improvement Measures	Level of Significance With Mitigation
M-CR-1a: Documentation <i>Continued</i>		<ul style="list-style-type: none"> • <i>HABS Historical Report</i>: A written historical narrative and report, per HABS Historical Report Guidelines. <p>The professional shall prepare the documentation and the planning department shall monitor its preparation. The professional shall submit the completed documentation for review and approval by a planning department preservation specialist before issuance of building permits. The documentation shall be disseminated to the planning department, San Francisco Main Library History Room, the Environmental Design Library at the University of California, Berkeley, the GLBT Historical Society's Archives & Research Center, and San Francisco Architectural Heritage.</p>	

Table S-1: Summary of Impacts, Mitigation Measures and Improvement Measures Identified in the EIR

Environmental Impacts	Level of Significance Without Mitigation	Mitigation/Improvement Measures	Level of Significance With Mitigation
		<p>M-CR-1b: Interpretive Program. The project sponsor shall develop an interpretive program to commemorate the LGBTQ use at the 150 Eureka Street building and its significant association with LGBTQ history of the neighborhood and city. Development of this interpretive program shall include outreach to the LGBTQ and Castro communities in order to involve these communities and to create a broader, more authentic interpretive approach for the project site and neighborhood. This outreach process should include identification of the most appropriate theme(s), as identified in the HRER and <i>Citywide LGBTQ Historic Context Statement</i>, on which to focus the interpretation program for this site. The interpretive program shall result, at minimum, in the preparation of a publicly-accessible walking tour guide to memorialize the building and its significance within the identified theme(s) associated with the neighborhood. The interpretive program should create a narrative, outline the significance of other buildings identified in the <i>Citywide LGBTQ Historic Context Statement</i>, namely their association with the similar theme(s), and develop a plaque or identifying system for properties as part of this walking tour guide.</p>	

Table S-1: Summary of Impacts, Mitigation Measures and Improvement Measures Identified in the EIR

Environmental Impacts	Level of Significance Without Mitigation	Mitigation/Improvement Measures	Level of Significance With Mitigation
M-CR-1b: Interpretive Program <i>Continued</i>		Interpretation of the site's history shall be supervised by a qualified consultant meeting the Secretary of the Interior's Professional Qualification Standards for Architectural Historian or Historian. The interpretive materials for use in the guide may include, but are not limited to: photographs, news articles, oral histories, memorabilia, and video. Historic information contained in the <i>Citywide LGBTQ Historic Context Statement</i> and HRE and HRER for the project may be used for content. A proposal prepared by the qualified consultant, with input from the outreach conducted in the LGBTQ and Castro communities, describing the general parameters of the interpretive program shall be approved by planning department preservation staff prior to issuance of a Site Permit. The detailed content, media and other characteristics of such interpretive program, and/or any alternative approach to interpretation identified by the project team, shall be approved by planning department preservation staff prior to issuance of a Temporary Certificate of Occupancy.	
<u>CR-2</u> : The construction of the proposed new building on the project site would not have a substantial adverse effect on any identified or potential off-site historical resources as defined in CEQA Guidelines section 15064.5 in the vicinity of the project site.	Less Than Significant	None required	N/A
<u>C-CR-1</u> : The proposed project, in combination with other past, present and reasonably foreseeable future projects in the project vicinity, would not result in a cumulatively considerable contribution to a significant cumulative impact on a historical architectural resource.	Less Than Significant	None required	N/A

Source: LSA, 2017.

Table S-2: Summary of Impacts, Mitigation Measures and Improvement Measures Identified in the NOP/IS

Environmental Impacts	Level of Significance Without Mitigation	Mitigation/Improvement Measures	Level of Significance With Mitigation
Land Use and Land Use Planning			
LU-1: The proposed project would not physically divide an established community.	Less Than Significant	None required	N/A
LU-2: The proposed project would not conflict with applicable land use plans, policies or regulations of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect.	Less Than Significant	None required	N/A
C-LU-1: The proposed project would not create a considerable contribution to cumulative significant land use impacts.	Less Than Significant	None required	N/A
Population and Housing			
PH-1: The proposed project would not directly or indirectly induce substantial population growth in San Francisco.	Less Than Significant	None required	N/A
PH-2: The proposed project would not displace substantial numbers of existing housing units or people and would not create demand for additional housing elsewhere.	Less Than Significant	None required	N/A
C-PH-1: The proposed project, in combination with past, present, and reasonably foreseeable future projects, would not result in a cumulative impact related to population and housing.	Less Than Significant	None required	N/A
Cultural Resources			
CP-1: Implementation of the proposed project would result in the demolition of the 150 Eureka Street building, a historical resource for the purposes of CEQA.	Potentially Significant Impact	See Table S-1	Significant

Table S-2: Summary of Impacts, Mitigation Measures and Improvement Measures Identified in the NOP/IS

Environmental Impacts	Level of Significance Without Mitigation	Mitigation/Improvement Measures	Level of Significance With Mitigation
<p>CP-2: The proposed project could result in a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5.</p>	<p>Significant</p>	<p><i>Mitigation Measure M-CP-2: Accidental Discovery of Archeological Resources</i></p> <p>The project sponsor shall distribute the Planning Department archeological resource “ALERT” sheet to the project prime contractor; to any project subcontractor (including demolition, excavation, grading, foundation, etc. firms); or utilities firm involved in soils disturbing activities within the project site. Prior to any soils disturbing activities being undertaken each contractor is responsible for ensuring that the “ALERT” sheet is circulated to all field personnel including, machine operators, field crew, supervisory personnel, etc. The project sponsor shall provide the ERO with a signed affidavit from the responsible parties (prime contractor, subcontractor(s), and utilities firm) to the ERO confirming that all field personnel have received copies of the Alert Sheet.</p> <p>Should any indication of an archeological resource be encountered during any soils disturbing activity of the project, the project Head Foreman and/or project sponsor shall immediately notify the ERO and shall immediately suspend any soils disturbing activities in the vicinity of the discovery until the ERO has determined what additional measures should be undertaken. If the ERO determines that an archeological resource may be present within the project site, the project sponsor shall retain the services of a qualified archeological consultant, based on standards developed by the Planning Department archeologist. The archeological consultant shall advise the ERO as to whether the discovery is an archeological resource, retains sufficient integrity, and is of potential scientific/historical/cultural significance.</p>	<p>Less Than Significant</p>

Table S-2: Summary of Impacts, Mitigation Measures and Improvement Measures Identified in the NOP/IS

Environmental Impacts	Level of Significance Without Mitigation	Mitigation/Improvement Measures	Level of Significance With Mitigation
Mitigation Measure M-CP-2 <i>Continued</i>		<p>If an archeological resource is present, the archeological consultant shall identify and evaluate the archeological resource. The archeological consultant shall make a recommendation as to what action, if any, is warranted. Based on this information, the ERO may require, if warranted, specific additional measures to be implemented by the project sponsor.</p> <p>Measures might include: preservation in situ of the archeological resource; an archeological monitoring program; or an archeological testing program. If an archeological monitoring program or archeological testing program is required, it shall be consistent with the Environmental Planning (EP) division guidelines for such programs. The ERO may also require that the project sponsor immediately implement a site security program if the archeological resource is at risk from vandalism, looting, or other damaging actions.</p> <p>The project archeological consultant shall submit a Final Archeological Resources Report (FARR) to the ERO that evaluates the historical significance of any discovered archeological resource and describing the archeological and historical research methods employed in the archeological monitoring/data recovery program(s) undertaken. Information that may put at risk any archeological resource shall be provided in a separate removable insert within the final report.</p>	

Table S-2: Summary of Impacts, Mitigation Measures and Improvement Measures Identified in the NOP/IS

Environmental Impacts	Level of Significance Without Mitigation	Mitigation/Improvement Measures	Level of Significance With Mitigation
Mitigation Measure M-CP-2 <i>Continued</i>		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 Archeological Site Survey Northwest Information Center (NWIC) shall receive one (1) copy and the ERO shall receive a copy of the transmittal of the FARR to the NWIC. The Environmental Planning division of the Planning Department shall receive one bound copy, one unbound copy and one unlocked, searchable PDF copy on CD 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 Historic Places. 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.	

Table S-2: Summary of Impacts, Mitigation Measures and Improvement Measures Identified in the NOP/IS

Environmental Impacts	Level of Significance Without Mitigation	Mitigation/Improvement Measures	Level of Significance With Mitigation
CP-3: Construction activities for the proposed project could result in the disturbance of human remains, including those interred outside of formal cemeteries, should such remains exist beneath the project site.	Significant	<p><i>Mitigation Measure M-CP-3: Human Remains and Associated or Unassociated Funerary Objects</i></p> <p>The treatment of human remains and of associated or unassociated funerary objects discovered during any soils disturbing activity shall comply with applicable State and Federal laws. This shall include immediate notification of the Coroner of the City and County of San Francisco and in the event of the Coroner's determination that the human remains are Native American remains, notification of the California State Native American Heritage Commission (NAHC) who shall appoint a Most Likely Descendant (MLD) (Pub. Res. Code Sec. 5097.98). The archeological consultant, project sponsor, ERO, and MLD shall have up to but not beyond six days after the discovery to make all reasonable efforts to develop an agreement for the treatment of human remains and associated or unassociated funerary objects with appropriate dignity (CEQA Guidelines. Sec. 15064.5(d)). The agreement should take into consideration the appropriate excavation, removal, recordation, analysis, custodianship, curation, and final disposition of the human remains and associated or unassociated funerary objects. Nothing in existing State regulations or in this mitigation measure compels the project sponsor and the ERO to accept recommendations of an MLD. The archeological consultant shall retain possession of any Native American human remains and associated or unassociated burial objects until completion of any scientific analyses of the human remains or objects as specified in the treatment agreement if such as agreement has been made or, otherwise, as determined by the archeological consultant and the ERO.</p>	Less Than Significant

Table S-2: Summary of Impacts, Mitigation Measures and Improvement Measures Identified in the NOP/IS

Environmental Impacts	Level of Significance Without Mitigation	Mitigation/Improvement Measures	Level of Significance With Mitigation
<p>CP-4: Construction activities for the proposed project could result in the disturbance of tribal resources, should such resources exist beneath the project site.</p>	Significant	<p><i>Mitigation Measure M-CP-4: Tribal Cultural Resources Interpretive Program</i></p> <p>If the ERO determines that a significant archeological resource is present, and if in consultation with the affiliated Native American tribal representatives, the ERO determines that the resource constitutes a tribal cultural resource (TCR) and that the resource could be adversely affected by the proposed project, the proposed project shall be redesigned so as to avoid any adverse effect on the significant tribal cultural resource, if feasible.</p> <p>If the ERO, in consultation with the affiliated Native American tribal representatives and the project sponsor, determines that preservation-in-place of the tribal cultural resources is not a sufficient or feasible option, the project sponsor shall implement an interpretive program of the TCR in consultation with affiliated tribal representatives. An interpretive plan produced in consultation with the ERO and affiliated tribal representatives, at a minimum, and approved by the ERO would be required to guide the interpretive program. The plan shall identify, as appropriate, proposed locations for installations or displays, the proposed content and materials of those displays or installation, the producers or artists of the displays or installation, and a long-term maintenance program. The interpretive program may include artist installations, preferably by local Native American artists, oral histories with local Native Americans, artifacts displays and interpretation, and educational panels or other informational displays.</p>	Less Than Significant

Table S-2: Summary of Impacts, Mitigation Measures and Improvement Measures Identified in the NOP/IS

Environmental Impacts	Level of Significance Without Mitigation	Mitigation/Improvement Measures	Level of Significance With Mitigation
C-CP-1: The proposed project, in combination with past, present, and reasonably foreseeable future projects in the vicinity could result in cumulative impacts to historic architectural resources.	Potentially Significant Impact	See Table S-1	Significant
C-CP-2: The proposed project, in combination with past, present, and reasonably foreseeable future projects in the vicinity could result in a substantial adverse change in the significance of previously undiscovered archaeological resources, human remains, including those interred outside of formal cemeteries; and tribal resources should such resources exist on or beneath the project site.	Significant	Implement <i>Mitigation Measure M-CP-2: Accidental Discovery of Archeological Resources; Mitigation Measure M-CP-3: Human Remains and Associated or Unassociated Funerary Objects; and Mitigation Measure M-CP-4: Tribal Cultural Resources Interpretive Program</i>	Less Than Significant
Transportation and Circulation			
TR-1: The proposed project would not 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.	Less Than Significant	None required	N/A
TR-2: The proposed project would not result in substantially increased hazards due to particular design features (e.g., sharp curves or dangerous intersections) or incompatible uses.	Less Than Significant	None required	N/A
TR-3: The proposed project would not result in inadequate emergency access.	Less Than Significant	None required	N/A
TR-4: The proposed project would not conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities, or cause a substantial increase in transit demand which cannot be accommodated by existing or proposed transit capacity or alternative travel modes.	Less Than Significant	None required	N/A

Table S-2: Summary of Impacts, Mitigation Measures and Improvement Measures Identified in the NOP/IS

Environmental Impacts	Level of Significance Without Mitigation	Mitigation/Improvement Measures	Level of Significance With Mitigation
C-TR-1: The proposed project, in combination with past, present, and reasonably foreseeable future projects, would not result in substantial cumulative transportation impacts.	Less Than Significant	None required	N/A
Noise			
NO-1: The proposed project would not result in exposure of persons to or generation of noise levels in excess of standards established in San Francisco's Noise Ordinance, nor would the proposed project result in a substantial permanent increase in ambient noise levels above levels existing without the project.	Less Than Significant	None required.	N/A
NO-2: Project demolition and construction would result in a temporary and periodic increase in ambient noise levels in the project vicinity above existing conditions.	Significant	<p><i>Mitigation Measure M-NO-2: Construction Noise Reduction</i></p> <p>The project contractor shall implement the following measures during construction of the project:</p> <ul style="list-style-type: none"> • Conduct noise monitoring at the beginning of major construction phases (e.g., demolition, excavation) to determine the need and the effectiveness of noise-attenuation measures. • Erect temporary plywood noise barriers around the construction site where the site adjoins noise-sensitive receivers. • Utilize noise control blankets on the building structures adjacent to the proposed project - and possibly other noise-sensitive receivers - as the building is erected to reduce noise emission from the site. • Post signs on-site pertaining to permitted construction days and hours, complaint procedures, and who to notify in the event of a problem, with telephone numbers listed. • Notify the Department of Building Inspection (DBI) and neighbors in advance of the schedule for each major phase of construction and expected loud activities. 	Less Than Significant

Table S-2: Summary of Impacts, Mitigation Measures and Improvement Measures Identified in the NOP/IS

Environmental Impacts	Level of Significance Without Mitigation	Mitigation/Improvement Measures	Level of Significance With Mitigation
Mitigation Measure M-NO-2 <i>Continued</i>		<ul style="list-style-type: none"> When feasible, select "quiet" construction methods and equipment (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures and acoustically-attenuating shields or shrouds). Require that all construction equipment be in good working order and that mufflers are inspected to be functioning properly. Avoid unnecessary idling of equipment and engines. Mobile noise-generating equipment (e.g., dozers, backhoes, and excavators) shall be required to prepare the entire site. However, the developer will endeavor to avoid placing stationary noise generating equipment (e.g., generators, compressors) within noise-sensitive buffer areas (measured at linear 20 feet) between immediately adjacent neighbors. The project sponsor shall require the general contractor to use impact tools (e.g., jack hammers, pavement breakers, and rock drills) that are hydraulically or electrically powered wherever possible to avoid noise associated with compressed air exhaust from pneumatically powered tools. Where use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust shall be used, along with external noise jackets on the tools. Ensure that all general construction related activities are restricted to between 7:00 a.m. and 8:00 p.m. per San Francisco Police Code Article 29. 	
NO-3: The proposed project would not expose people to excessive groundborne vibration or groundborne noise levels.	Less Than Significant	None required	N/A
NO-4: The proposed project would not be substantially affected by existing noise levels.	Less Than Significant	None required	N/A

Table S-2: Summary of Impacts, Mitigation Measures and Improvement Measures Identified in the NOP/IS

Environmental Impacts	Level of Significance Without Mitigation	Mitigation/Improvement Measures	Level of Significance With Mitigation
C-NO-1: The proposed project in combination with past, present, and reasonably foreseeable future projects would not create a significant cumulative noise or vibration impact.	Significant	None required	Less Than Significant
Air Quality			
AQ-1: Implementation of the proposed project would not conflict with or obstruct implementation of the local applicable air quality plan.	Less Than Significant	None required	N/A
AQ-2: Implementation of the proposed project would not violate an air quality standard or contribute substantially to an existing or projected air quality violation.	Less Than Significant	None required	N/A
AQ-3: Implementation of the proposed project would not result in a cumulatively considerable net increase of a criteria pollutant for which the project region is non-attainment under an applicable federal, State, or regional ambient air quality standard.	Less Than Significant	None required	N/A
AQ-4: Implementation of the proposed project would not expose sensitive receptors to substantial pollutant concentrations.	Less Than Significant	None required	N/A
AQ-5: Implementation of the proposed project would not create objectionable odors affecting a substantial number of people.	Less Than Significant	None required	N/A
C-AQ-1: The proposed project, in combination with past, present, and reasonably foreseeable future development in the project area would not contribute to a cumulative air quality impact.	Less Than Significant	None required	N/A
Greenhouse Gas Emissions			
C-GG-1: The proposed project would generate greenhouse gas emissions, but not at levels that would result in a significant impact on the environment or conflict with any policy, plan, or regulation adopted for the purpose of reducing greenhouse gas emissions.	Less Than Significant	None required	N/A

Table S-2: Summary of Impacts, Mitigation Measures and Improvement Measures Identified in the NOP/IS

Environmental Impacts	Level of Significance Without Mitigation	Mitigation/Improvement Measures	Level of Significance With Mitigation
C-GG-1: The proposed project would generate greenhouse gas emissions, but not at levels that would result in a significant impact on the environment or conflict with any policy, plan, or regulation adopted for the purpose of reducing greenhouse gas emissions.	Less Than Significant	None required	N/A
Wind and Shadow			
WS-1: The proposed project would not alter wind in a manner that substantially affects public areas within the vicinity of the project area.	Less Than Significant	None required	N/A
WS-2: The proposed project would not create new shadow in a manner that substantially affects outdoor recreation facilities or other public areas.	Less Than Significant	None required	N/A
C-WS-1: The proposed project, in combination with past, present, and reasonably foreseeable future projects, would not result in a cumulative wind or shadow impacts.	Less Than Significant	None required	N/A
Recreation			
RE-1: The proposed project would not 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.	Less Than Significant	None required	N/A
RE-2: The proposed project would not include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment.	Less Than Significant	None required	N/A
RE-3: The proposed project would not physically degrade existing recreational resources.	Less Than Significant	None required	N/A
C-RE-1: The proposed project, in combination with past, present, and reasonably foreseeable future projects, would not result in a cumulative impact on recreational facilities or open space resources.	Less Than Significant	None required	N/A

Table S-2: Summary of Impacts, Mitigation Measures and Improvement Measures Identified in the NOP/IS

Environmental Impacts	Level of Significance Without Mitigation	Mitigation/Improvement Measures	Level of Significance With Mitigation
Utilities and Service Systems			
UT-1: Implementation of the proposed project would not exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board, would not exceed the capacity of the wastewater treatment provider that would serve the project, and would not require the construction of new or expansion of existing wastewater treatment or stormwater drainage facilities.	Less Than Significant	None required	N/A
UT-2: The proposed project would not require expansion or construction of new water supply or treatment facilities.	Less Than Significant	None required	N/A
UT-3: The proposed project would be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs.	Less Than Significant	None required	N/A
UT-4: Construction and operation of the proposed project would comply with all applicable statutes and regulations related to solid waste.	Less Than Significant	None required	N/A
C-UT-1: The proposed project, in combination with past, present, and reasonably foreseeable future projects, would not result in a cumulative impact related to utilities or service systems.	Less Than Significant	None required	N/A
Public Services			
PS-1: The proposed project would not result in a substantial adverse physical impact associated with the provision of police services.	Less Than Significant	None required	N/A
PS-2: The proposed project would not result in a substantial adverse physical impact associated with the provision of fire services.	Less Than Significant	None required	N/A
PS-3: The proposed project would not result in a substantial adverse physical impact associated with the provision of school services.	Less Than Significant	None required	N/A

Table S-2: Summary of Impacts, Mitigation Measures and Improvement Measures Identified in the NOP/IS

Environmental Impacts	Level of Significance Without Mitigation	Mitigation/Improvement Measures	Level of Significance With Mitigation
PS-4: The proposed project would not result in a substantial adverse physical impact associated with the provision of other public services, such as libraries.	Less Than Significant	None required	N/A
C-PS-1: The proposed project, in combination with past, present, and reasonably foreseeable projects, would not result in a cumulative impact on public services.	Less Than Significant	None required	N/A
Biological Resources			
BI-1: The proposed project would not have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species, riparian habitat or sensitive natural communities, and would not interfere substantially with any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.	Less Than Significant	None required	N/A
BI-2: The proposed project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.	Less Than Significant	None required	N/A
C-BI-1: The proposed project, in combination with past, present, and reasonably foreseeable future projects, would not result in a cumulative impact related to biological resources.	Less Than Significant	None required	N/A
Geology and Soils			
GE-1: The proposed project would not increase the exposure of people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, seismic groundshaking, liquefaction, lateral spreading, or landslides.	Less Than Significant	None required	N/A
GE-2: The proposed project would not result in substantial loss of topsoil or erosion.	Less Than Significant	None required	N/A

Table S-2: Summary of Impacts, Mitigation Measures and Improvement Measures Identified in the NOP/IS

Environmental Impacts	Level of Significance Without Mitigation	Mitigation/Improvement Measures	Level of Significance With Mitigation
GE-3: The proposed project would not be located on a geologic unit 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.	Less Than Significant	None required	N/A
GE-4: The proposed project could be located on expansive soil, as defined in the California Building Code, creating substantial risk to life or property.	Less Than Significant	None required	N/A
GE-5: The proposed project would not substantially change the topography of the site or any unique geologic or physical features of the site.	Less Than Significant	None required	N/A
GE-6: The proposed project would not indirectly destroy a unique paleontological resource or site or unique geologic feature.	Less Than Significant	None required	N/A
C-GE-1: The proposed project, in combination with past, present, and reasonably foreseeable future projects, would not result in a cumulative impact related to geology and soils.	Less Than Significant	None required	N/A
Hydrology and Water Quality			
HY-1: The proposed project would not violate water quality standards or otherwise substantially degrade water quality.	Less Than Significant	None required	N/A
HY-2: The proposed project would not 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.	Less Than Significant	None required	N/A
HY-3: The proposed project would not result in altered drainage patterns that would cause substantial erosion or flooding.	Less Than Significant	None required	N/A

Table S-2: Summary of Impacts, Mitigation Measures and Improvement Measures Identified in the NOP/IS

Environmental Impacts	Level of Significance Without Mitigation	Mitigation/Improvement Measures	Level of Significance With Mitigation
HY-4: The proposed project would not contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff.	Less Than Significant	None required	N/A
C-HY-1: The proposed project, in combination with past, present, and reasonably foreseeable future projects in the site vicinity, would result in less-than-significant cumulative impacts to hydrology and water quality.	Less Than Significant	None required	N/A
Hazards and Hazardous Materials			
HZ-1: The proposed project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.	Less Than Significant	None required	N/A
HZ-2: The proposed project would not create a significant hazard to the public or the environment through reasonably foreseeable conditions involving the release of hazardous materials into the environment.	Less Than Significant	None required	N/A
HZ-3: The proposed project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 miles of an existing school.	Less Than Significant	None required	N/A
HZ-4: The project site is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, and the proposed project would 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.	Less Than Significant	None required	N/A

Table S-2: Summary of Impacts, Mitigation Measures and Improvement Measures Identified in the NOP/IS

Environmental Impacts	Level of Significance Without Mitigation	Mitigation/Improvement Measures	Level of Significance With Mitigation
HZ-5: The proposed project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan and would not expose people or structures to a significant risk of loss, injury, or death involving fires.	Less Than Significant	None required	N/A
C-HZ-1: The proposed project, in combination with past, present, and reasonably foreseeable future projects in the site vicinity, would result in less-than-significant cumulative impacts related to hazards and hazardous materials.	Less Than Significant	None required	N/A
Mineral and Energy Resources			
ME-1: The proposed project would not encourage activities which would result in the use of large amounts of fuel, water, or energy, or use these in a wasteful manner.	Less Than Significant	None required	N/A
C-ME-1: The proposed project, in combination with past, present, and reasonably foreseeable future projects in the site vicinity, would result in less-than-significant cumulative impacts to minerals and energy.	Less Than Significant	None required	N/A

Source: LSA, 2017, *150 Eureka Street Notice of Preparation/Initial Study*.

SUMMARY OF ALTERNATIVES

The following three alternatives to the project are considered in this EIR, and are further detailed in Chapter VI, Alternatives, pp. 99–132:

- The **No Project Alternative**, under which the project site would not be redeveloped with the proposed project. The existing vacant building would remain in its current condition.
- The **Full Preservation Alternative**, under which the existing building envelope would be maintained with no vertical or horizontal additions. The building interior would be adapted to accommodate a total of four two-bedroom dwelling units for a total building area of 8,338 gsf, and a total building height of approximately 35 feet. No off-street parking would be provided. The rear yard would be 691 gsf.
- The **Partial Preservation Alternative**, under which the existing building envelope would be maintained at the ground level with interior modifications as well as vertical and horizontal additions. The building interior would be adapted to accommodate four dwelling units, each with three bedrooms, for a total building area of 16,690 gsf and a total building height of 40 feet. Off-street vehicular parking for four vehicles. The rear yard would be 1,114 gsf.

A comparison of the development program and impacts identified for the proposed project and project alternatives is included in **Table S-3**.

Table S-3: Comparison of Characteristics and Significant Impacts of the Proposed Project with EIR Alternatives


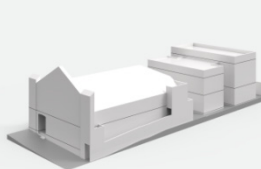
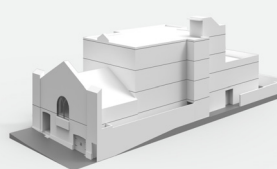
	Proposed Project	No Project Alternative	Full Preservation Alternative	Partial Preservation Alternative
		Assumes No Changes to the Site		
Description				
Building height (feet/inches)	40 ft	29 ft, 6-3/8 inches	29 ft, 6-3/8 inches	40 ft
Number of stories	4	2	4	4
Total number of residential units	4	0	4	4
2 bedroom	0	0	4	0
3 bedroom	2	0	0	4
4 bedroom	2	0	0	0
Gross square foot (gsf) by use				
Residential units	10,119	0	6,923	11,035
Open space private decks	1,081	0	673	1,237
Garage	2,332	0	0	870
Common area	909	0	742	3,548
Total Building Area	14,441	9,350	8,338	16,690
Rear yard at grade (gsf)	2,232	0	691	1,114
Open space (gsf) (125 sf private; 166 sf if common)	3,313 private 0 common	0	673 private 587 common	1,237 private 720 common

Table S-3: Comparison of Characteristics and Significant Impacts of the Proposed Project with EIR Alternatives


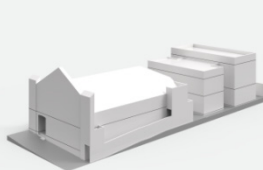
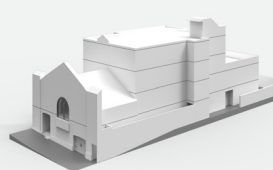
	Proposed Project	No Project Alternative	Full Preservation Alternative	Partial Preservation Alternative
		Assumes No Changes to the Site		
Off-street vehicle parking spaces	8	0	0	4
Bicycle parking spaces (class 1)	4	0	4	4
Lot number/size	6,250 sf lot would be split into two 3,125 sf lots, approximately	N/A	6,250 sf lot to be developed as one lot as currently exists	6,250 sf lot to be developed as one lot as currently exists
Planning entitlements	Building Permit Application In RH-2 Zoning District, with proposed lot split, each lot permitted two dwelling units	N/A	Conditional Use Authorization In RH-2 Zoning District with no lot split (one dwelling unit per 1,500sf lot area) Variance: For change of use in required rear yard	Conditional Use Authorization In RH-2 Zoning District with no lot split (one dwelling unit per 1,500 sf lot area) Variance: For minor encroachment into required rear yard

Table S-3: Comparison of Characteristics and Significant Impacts of the Proposed Project with EIR Alternatives


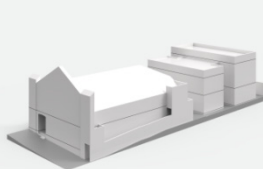
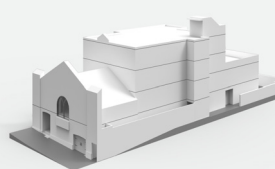

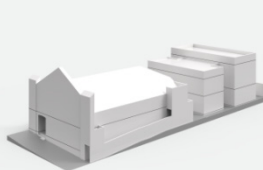
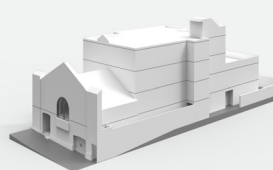
	Proposed Project	No Project Alternative	Full Preservation Alternative	Partial Preservation Alternative
		Assumes No Changes to the Site		
Ability to Meet Project Sponsor's Objectives				
	The project meets all five of the project sponsor objectives.	The No Project Alternative meets none of the five project sponsor objectives.	The Full Preservation Alternative would fully meet Objective #3 and partially meet Objectives #1 and #2 of the proposed project. Objectives #4 and #5 would not be met.	The Partial Preservation Alternative would fully meet Objective #3 and partially meet Objectives #1 and #2 of the proposed project. Objectives #4 and #5 would not be met.
Historic Architectural Resources				
Historic Architectural Resources	<u>Impact CR-1</u> : The demolition of the Metropolitan Community Church Building located at 150 Eureka Street would result in a substantial adverse change to the significance of an individual historical architectural resource as defined by CEQA Guidelines section 15064.5(b). (SUM)	N/A	Reduced Impact (LTS)	Reduced Impact but same outcome as the proposed project (SUM)

Table S-3: Comparison of Characteristics and Significant Impacts of the Proposed Project with EIR Alternatives

	Proposed Project	No Project Alternative	Full Preservation Alternative	Partial Preservation Alternative
		Assumes No Changes to the Site		
Cumulative – Historic Architectural Resources	<u>Impact C-CR-1</u> : The proposed project, in combination with other past, present and reasonably foreseeable future projects in the project vicinity, would not result in a cumulatively considerable contribution to a significant cumulative impact on a historical architectural resource. (LTS)	N/A	Reduced Impact (LTS)	Reduced Impact (LTS)

SF = square feet

NI = no impact; LTS = less than significant; S = significant; SU = significant unavoidable; SUM = significant and unavoidable impact with mitigation; N/A = not applicable

Source: 150 Eureka Street, LLC, 2017; LSA, 2017.

ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Pursuant to CEQA Guidelines section 15126(e)(2), an EIR is required to identify the environmentally superior alternative from among the alternatives evaluated if the proposed project has significant impacts that cannot be mitigated to a less-than-significant level. The Environmentally Superior Alternative is the alternative that best avoids or lessens any significant effects of the proposed project, even if the alternative would impede to some degree the attainment of the project objectives. The No Project Alternative is considered the overall environmentally superior alternative because implementation of the proposed project would not occur with the No Project Alternative, and therefore would not result in significant impacts related to historic architectural resources.

If the No Project Alternative is environmentally superior, CEQA requires selection of the “environmentally superior alternative other than the no project alternative” from among the other alternatives evaluated. The proposed project would result in significant and unavoidable project-level impact related to historical architectural resources. Although the Partial Preservation Alternative would result in a design that meets most of the project’s objectives, its implementation would nonetheless result in significant and unavoidable adverse impacts. The Full Preservation Alternative would be the environmentally superior alternative because, unlike the proposed project or the Partial Preservation Alternative, it would result in less-than-significant impacts related to historic architectural resources, and **Mitigation Measure M-CR-1a: Documentation** and **Mitigation Measure M-CR-1b: Interpretive Program**, pp. 85–87, would not be required. In addition, potential conflicts with the general plan urban design element and Accountable Planning Initiative policies related to the preservation of historic resources would be avoided. Moreover, of the alternatives considered, the Full Preservation Alternative would require the least amount of physical alteration to the 150 Eureka Street historic architectural resource. More specifically, the Full Preservation Alternative would maintain most of the original building envelope, modify portions of the secondary and rear-facing façade with no vertical or horizontal additions, and retain the distinct features of the building that contribute to the integrity of the resource, such as the street facing building façade and original gable roof, the large, multi-paned, arched window, original main entrance, stucco cladding and brick water table. As the alternative with the least amount of physical alteration and preservation of all of the

character-defining features, it would result in the fewest impacts to this LGBTQ-associated historical architectural resource.

AREAS OF KNOWN CONTROVERSY AND ISSUES TO BE RESOLVED

Publication of the NOP/IS initiated a 30-day public review and comment period that began on May 24, 2017, and ended on June 23, 2017. During the review and comment period, several comments were submitted to the planning department by interested parties. The comment letters and emails received in response to the NOP/IS are available for review as part of Case File No. 2015-011274ENV. The planning department has considered the comments made by the public in preparation of the draft EIR for the proposed project. Topics raised in the written comments include potential impacts related to historic resources; compatibility with surrounding land uses; existing private views; traffic and circulation; water supply; cumulative impacts; and potential alternatives that should be considered. Commenters also expressed concerns with certain aspects of the proposed project, such as proposed building setbacks and lack of affordable housing. Commenters also expressed opinions both in favor of and in opposition to the proposed project.

The planning department has considered the comments made by the public in preparation of the draft EIR for the proposed project. This draft EIR will be circulated for public review and comment. During this period, written comments concerning the accuracy and adequacy of the draft EIR will be accepted and a public hearing will be held before the planning commission to receive oral comments.

Following the close of the draft EIR public review and comment period, the planning department will prepare and publish a document entitled “Responses to Comments,” which will contain a copy of all comments on this draft EIR and the city’s responses to those comments, along with copies of the letters received and a transcript of the planning commission public hearing on the draft EIR. This draft EIR, together with the responses to comments document, will be considered by the planning commission in an advertised public meeting, and then certified as a final EIR, if deemed adequate.

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

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

I. INTRODUCTION

PROJECT SUMMARY

150 Eureka Street LLC (project sponsor) proposes to redevelop an approximately 6,246-square-foot parcel (Assessor's Block 2692, Lot 007) located at 150 Eureka Street in San Francisco's Castro/Upper Market neighborhood. The project would result in the demolition of an existing vacant two-story, wood-frame church building located at the site and construction of two four-story buildings, each with a total of two residential units. The two buildings would total approximately 14,441 gross square feet (gsf) in size, and each would include a four-car garage and indoor common areas. The proposed buildings would not exceed 40 feet in height. Chapter II, Project Description, pp. 13–32, provides a detailed description of the proposed project.

PURPOSE OF THE EIR

This environmental impact report (EIR) analyzes the physical environmental effects associated with implementation of the proposed project. This EIR has been prepared by the San Francisco Planning Department (planning department) in the City and County of San Francisco (city), the lead agency for the proposed project, in compliance with the provisions of the California Environmental Quality Act (CEQA) and the CEQA Guidelines (California Public Resources Code section 21000 et seq., and California Code of Regulations Title 14, section 15000 et seq., "CEQA Guidelines"), and Chapter 31 of the San Francisco Administrative Code. The lead agency is the public agency that has the principal responsibility for carrying out or approving a project.

As described by CEQA and in the CEQA Guidelines section 15021, public agencies are charged with the duty to avoid or substantially lessen significant environmental effects, where feasible. In undertaking this duty, a public agency has an obligation to balance a project's significant effects on

the environment with its benefits, including economic, social, technological, legal, and other non-environmental characteristics.

As stated in Sections 15121 (a) and 15362 of the CEQA Guidelines, an EIR is intended as an informational document to: evaluate the proposed project and the potential for significant impacts on the environment; examine methods of reducing adverse environmental impacts; identify any significant and unavoidable adverse impacts that cannot be mitigated; and identify reasonable and feasible alternatives to the proposed project that would eliminate any significant adverse environmental effects or reduce the impacts to a less-than-significant level. The lead agency is required to consider the information in the EIR, along with any other relevant information, in making its decisions on the proposed project. This analysis, in and of itself, does not determine whether a project will be approved, but aids the planning and decision-making process by disclosing the potential for significant and adverse impacts.

In conformance with CEQA and the CEQA Guidelines section 15121 and 15126, this EIR provides objective information addressing the environmental consequences of the project and identifies possible means of reducing or avoiding significant impacts, either through mitigation measures or feasible project alternatives. The city must certify the final EIR prior to acting on the project approval application for the proposed 150 Eureka Street project. Under CEQA Guidelines section 15161, this is a project-level EIR. This most common type of EIR examines the environmental impacts of a project and focuses primarily on changes in the environment that would result from project development. This type of EIR examines all phases of a project including planning, construction, and operation.

The CEQA Guidelines help define the role and standards of this EIR, as follows:

- **Information Document.** An EIR is an informational document that will inform public agency decision-makers and the public generally of the significant environmental effect(s) of a project, identify possible ways to minimize significant effects, and describe reasonable alternatives to the project. The public agency shall consider the information in the EIR

along with other information that may be presented to the agency (CEQA Guidelines section 15121(a)).

- **Degree of Specificity.** The degree of specificity required in an EIR will correspond to the degree of specificity involved in the underlying activity that is described in the EIR. An EIR on a development project will necessarily be more detailed in its discussion of specific effects of the project than will be an EIR on the adoption of a local general plan or comprehensive zoning ordinance because the effects of the construction can be predicted with greater accuracy (CEQA Guidelines section 15146(a)).
- **Standards for Adequacy of an EIR.** An EIR should be prepared with a sufficient degree of analysis to provide decision-makers with information, which enables them to make a decision that intelligently takes account of environmental consequences. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The courts have looked not for perfection but for adequacy, completeness, and a good faith effort at full disclosure (CEQA Guidelines section 15151).

Section 15382 of the CEQA Guidelines defines a significant effect on the environment as “a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project...” Therefore, in identifying the significant impacts of the project, this EIR focuses on the substantial physical effects and mitigation measures to avoid, reduce, or otherwise alleviate those effects.

ENVIRONMENTAL REVIEW PROCESS

The planning department, serving as lead agency and responsible for administering the environmental review on behalf of the City and County of San Francisco, determined that

preparation of an EIR was required for the proposed project to address issues pertaining to historic architectural resources.

Before a decision is made to approve a project that could result in adverse physical effects, CEQA requires an EIR to be prepared that fully describes the environmental effects of that project. The EIR is a public information document for use by government agencies and the public that identifies and evaluates the potential environmental impacts of a project, recommends mitigation measures to lessen or eliminate significant adverse impacts, and examines feasible alternatives. The information in the EIR must be reviewed and considered by the San Francisco Planning Commission and other approving bodies prior to a decision to approve, disapprove, or modify a project.

CEQA requires that the lead agency neither approve nor implement a project unless the project's significant environmental effects have been reduced to a less-than-significant level, essentially "eliminating, avoiding, or substantially lessening" the expected impact, except when certain findings are made (CEQA Guidelines section 15091(a)).¹ If the lead agency approves a project that will result in significant adverse impacts that cannot be mitigated to less-than-significant levels, the agency must state the reasons for its action in writing, demonstrate that its action is based on the EIR or other information in the record, and adopt a statement of overriding considerations (CEQA Guidelines section 15092(b)(2)(B)).²

¹ Section 21083, Public Resources Code; Reference: Sections 21002, 21002.1, 21081, and 21081.6, Public Resources Code; *Laurel Hills Homeowners Association v. City Council* (1978), 83 Cal.App.3d 515; *Cleary v. County of Stanislaus* (1981), 118 Cal.App.3d 348; *Sierra Club v. Contra Costa County* (1992), 10 Cal.App.4th 1212; *Citizens for Quality Growth v. City of Mount Shasta* (1988), 198 Cal.App.3d 433.

² Section 21083, Public Resources Code. Reference: Sections 21002, 21002.1, 21081 and 21159.26, Public Resources Code; *Friends of Mammoth v. Board of Supervisors* (1972), 8 Cal. App. 3d 247; *San Francisco Ecology Center v. City and County of San Francisco* (1975), 48 Cal. App. 3d 584; *City of Carmel-by-the-Sea v. Board of Supervisors* (1977), 71 Cal. App. 3d 84; *Laurel Hills Homeowners Association v. City Council* (1978), 83 Cal. App. 3d 515.

The environmental review process for this project includes a number of steps: publication and circulation for public comment of a notice of preparation/initial study (NOP/IS) (Appendix A), publication of a draft EIR for public review and comment, preparation and publication of responses to public and agency comments on the draft EIR, and certification of the final EIR. The environmental review process is initiated when the project sponsor files an environmental evaluation application. An environmental evaluation application for the 150 Eureka Street project was submitted to the planning department on August 17, 2015.

Notice of Preparation/Initial Study

The planning department prepared an initial study and published a notice of preparation of an EIR on May 24, 2017, announcing the intent to prepare and distribute a focused EIR (the NOP/IS is included as Appendix A).

Effects Found to be Less than Significant in the Initial Study

The NOP/IS found that the following potential individual and cumulative environmental effects of the project, as fully analyzed in the NOP/IS, would be either less than significant or would be reduced to a less-than-significant level through recommended mitigation measures:

- Land use and land use planning;
- Population and housing;
- Cultural resources (archeological resources, human remains, tribal cultural resources);
- Transportation and circulation;
- Noise;
- Air quality;
- Greenhouse gas emissions;
- Wind and shadow;
- Recreation;

- Utilities and service systems;
- Public services;
- Biological resources;
- Geology and soils;
- Hydrology and water quality;
- Hazards and hazardous materials;
- Mineral and energy resources; and
- Agricultural and forest resources.

Effects Found to Be Potentially Significant

On the basis of this NOP/IS, the topic for which there are project-specific effects that have been determined to be potentially significant is:

- Cultural resources (historic architectural resources only).

The NOP/IS determined that an EIR would be required to analyze this topic under CEQA.

Public Review of the NOP/IS

Publication of the NOP/IS initiated a 30-day public review and comment period that began on May 24, 2017, and ended on June 23, 2017. During the review and comment period, a total of 10 comments, including letters and emails were submitted to the planning department by interested parties. The comment letters and emails received in response to the NOP/IS are available for review as part of Case File No. 2015-011274ENV. The planning department has considered the comments made by the public in preparation of the draft EIR for the proposed project. Comments on the NOP/IS that relate to environmental issues are addressed and analyzed throughout this EIR and the NOP/IS (see Appendix A). Topics raised in the written comments include potential impacts related to historic resources (addressed in Section IV.A, Historic Architectural Resources, pp. 49–90, of this EIR); compatibility with surrounding land uses (addressed in Section H.1, Land Use of the NOP/IS,

pp. 30-32, in the NOP/IS); existing private views (addressed on pages 27-28 of the NOP/IS); traffic and circulation (addressed in Section H.4, Transportation and Circulation, pp. 44–54, in the NOP/IS); water supply (addressed in Section H.10, Utilities and Service Systems, p. 88, in the NOP/IS); cumulative impacts (addressed under all topics in the NOP/IS and in Section IV.A, Historic Architectural Resources, pp. 49–90, of this EIR); and potential alternatives that should be considered (addressed in Chapter VI, Alternatives, pp. 99–132, of this EIR). With the exception of impacts to historic architectural resources, all other impacts identified in the NOP/IS were determined to be less than significant.

Commenters also expressed concerns with certain aspects of the proposed project, such as proposed building setbacks and lack of affordable housing. Two comment letters were also received that expressed support for the proposed project.

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

Draft Environmental Impact Report

This draft EIR has been prepared in accordance with CEQA and the CEQA Guidelines. The draft EIR provides an analysis of the project-specific physical environmental impacts of construction and operation of the proposed project and the project's contribution to the environmental impacts from past, present, and reasonably foreseeable future development in the project site vicinity and the city as a whole.

Copies of the draft EIR are available at the Planning Information Center (PIC) counter at the San Francisco Department of Building Inspection, 1660 Mission Street, 1st Floor. The draft EIR is also available for viewing or downloading at the planning department website, <http://tinyurl.com/sfceqadocs>, by choosing the link for Negative Declarations and EIRs under “Current Documents for Public Review” and searching for Case File No. 2015-011274ENV. You may also request that a copy be sent to

you by calling (415) 575-9146 or emailing the environmental planner, Jenny Delumo, at jenny.delumo@sfgov.org.

All documents referenced in this draft EIR, and the distribution list for the draft EIR, are available for review at the San Francisco Planning Department, 1650 Mission Street, Suite 400, as part of Case File No. 2015-011274ENV.

How to Comment on the Draft EIR

This draft EIR was published on December 6, 2017. There will be a public hearing before the planning commission during the 49-day public review and comment period for this EIR to solicit public comment on the adequacy and accuracy of information presented in this draft EIR. The public comment period for this EIR is December 6, 2017 to January 23, 2018. The public hearing on this draft EIR has been scheduled before the planning commission for January 18, 2018 in Room 400, City Hall, 1 Carlton B. Goodlett Place, beginning at 1 p.m. or later. Please call (415) 588-6422 the week of the hearing for a recorded message giving a more specific time. In addition, members of the public are invited to submit written comments on the adequacy of the document, that is, whether this draft EIR identifies and analyzes the possible environmental impacts and identifies appropriate mitigation measures.

Written comments should be submitted to:

Jenny Delumo, Environmental Planner
Re: 150 Eureka Street Project Draft EIR
San Francisco Planning Department
1650 Mission Street, Suite 400
San Francisco, CA 94103

Comments may also be submitted by email to jenny.delumo@sfgov.org. Comments must be received by 5 p.m., on January 23, 2018.

Commenters are not required to provide personal identifying information. All written and oral communications, including submitted personal contact information, may be made available to the

public for inspection and copying upon request and may appear on the San Francisco Planning Department's website or in other public documents.

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

Other Hearings Known at the Time of the Draft EIR Publication

There will be a public hearing before the Historic Preservation Commission on this draft EIR on December 20, 2017, in Room 400, City Hall, 1 Dr. Carlton B. Goodlett Place, beginning at 12:30 p.m. or later.³ During the hearing, the Historic Preservation Commission will consider providing comments on this draft EIR.

Final EIR

Following the close of the draft EIR public review and comment period, the planning department will prepare and publish a document entitled "Responses to Comments," which will contain a copy of all comments on this draft EIR and the city's responses to those comments, along with copies of the letters received and a transcript of the planning commission public hearing on the draft EIR. This draft EIR, together with the responses to comments document, will be considered by the planning commission in an advertised public meeting, and then certified as a final EIR, if deemed adequate.

The planning commission will use the information in the final EIR in their deliberations on whether to approve, modify, or deny the proposed project or aspects of the proposed project. If the planning commission decides to approve the proposed project, its approval action must include findings that identify significant project-related impacts that would result; discuss mitigation measures or

³ Note that this is not a public hearing on the draft EIR to receive public comments; however, the Historic Preservation Commission may consider providing comments on the draft EIR. Public testimony at the Historic Preservation Commission will not be considered as comments on the draft EIR and will not be addressed in the Responses to Comments document.

alternatives that have been adopted to reduce significant impacts to less-than-significant levels; determine whether mitigation measures or alternatives are within the jurisdiction of other public agencies; and explain reasons for rejecting mitigation measures or alternatives if any are infeasible for legal, social, economic, technological, or other reasons.

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

ORGANIZATION OF THE DRAFT EIR

This draft EIR has been organized as follows:

- **Summary:** This chapter summarizes the EIR by providing a concise overview of the project; the environmental impacts that would result from the project; mitigation measures identified to reduce or eliminate these impacts; and project alternatives.
- **Chapter I – Introduction:** This chapter includes a summary of the proposed project, a discussion of the purpose of the EIR, a list of the EIR organization, and a discussion of the environmental review process, including a list of areas of controversy to be resolved.
- **Chapter II – Project Description:** This chapter discusses the objectives of the proposed project; provides background data on the project location; describes the operational and physical characteristics of the project; and identifies project approvals.

- **Chapter III – Plans and Policies:** This chapter provides a summary of the plans, policies, and regulations of the City and County of San Francisco that are applicable to the proposed project.
- **Chapter IV – Environmental Setting, Impacts and Mitigation Measures:** This chapter describes the project’s existing setting, environmental impacts, cumulative impacts, and mitigation measures. Due to the nature of the proposed project, this focused EIR will analyze the environmental topic of Historic Architectural Resources.
- **Chapter V – Other CEQA Issues:** This chapter describes growth inducement that would result from the proposed project; summarizes the significant environmental effects that cannot be mitigated to a less-than-significant level; describes significant irreversible changes that would result if the project is implemented; and includes a summary of the comments received on the scope of the EIR and responses to those comments.
- **Chapter VI – Alternatives:** This chapter presents alternatives to the proposed project, including the No Project Alternative; Full Preservation Alternative; and Partial Preservation Alternative, as well as other alternatives considered but rejected as infeasible. In addition, the environmentally superior alternative is identified.
- **Chapter VII – Report Preparers:** This chapter identifies preparers of the EIR.
- **Appendices:** Appendices include the NOP/IS (Appendix A).

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II. PROJECT DESCRIPTION

PROJECT OVERVIEW

The proposed 150 Eureka Street Project (project) would result in the development of four residential units on a 6,246-square-foot parcel (Assessor's Block 2692, Lot 007) located at 150 Eureka Street in the Castro/Upper Market neighborhood in the City of San Francisco (city). The project would result in the demolition of the existing vacant two-story, wood-frame church building located at the site and construction of two four-story buildings each with a total of two residential units. The two buildings would total approximately 14,441 gross square feet (gsf) in size, and each would include a four-car garage and indoor common areas. The proposed buildings would not exceed 40 feet in height. This chapter includes a complete description of the proposed project, including a list of project objectives, a detailed description of the proposed project's regional and local context, planning process and background, as well as a discussion of requested project approvals.

PROJECT SPONSOR'S OBJECTIVES

1. Re-develop a large underutilized site with high-quality, sustainable, and economically feasible family-sized three- and four-bedroom residential dwellings, including off-street parking, within the existing density designation for the site, in order to help meet projected City housing needs and also introduce new midblock open space where none currently exists at the rear of the site.
2. Develop a project that achieves high-quality urban design and current sustainability standards, is sensitive to and compatible with its residential surroundings, and enhances the existing urban design character of the area.
3. Build residential units on the site to contribute to the City's General Plan Housing Element goals and the Association of Bay Area Governments (ABAG) Regional Housing Needs Allocation for the City and County of San Francisco.

4. Provide a new midblock open space that will enhance the quality of life for the project's residents and neighbors.
5. Construct a high-quality project that will produce a reasonable return on investment for the project sponsor and its investors and will be able to attract investment capital and construction financing.

PROJECT SITE

The approximately 6,246-square-foot project site is located in the Castro/Upper Market neighborhood and is located within a developed city block bounded by 18th Street to the north, Eureka Street to the east, 19th Street to the south, and Douglass Street to the west. The site is located on the west side of Eureka Street, at 150 Eureka Street (Assessor's Block 2692, Lot 007). **Figure II-1** shows the location of the project site and **Figure II-2**, p. 16, provides an aerial view of the site. **Figure II-3**, p. 17, illustrates existing site conditions.

The project site is currently developed with a two-story approximately 29-foot-tall wood-frame building constructed circa 1909. The building is set back approximately 9 inches from the property line at the street front and 3 feet from the rear property line. Side yard setbacks are 3 feet 4 inches on the north and range from 3 to 4 feet on the south. There is no existing vegetation on the project site itself; however, two street trees are located in front of the building. The topography of the site is generally level, and Eureka Street slopes gradually downward to the northeast. A total of three on-street parking spaces are located in front of the building on the Eureka Street frontage.

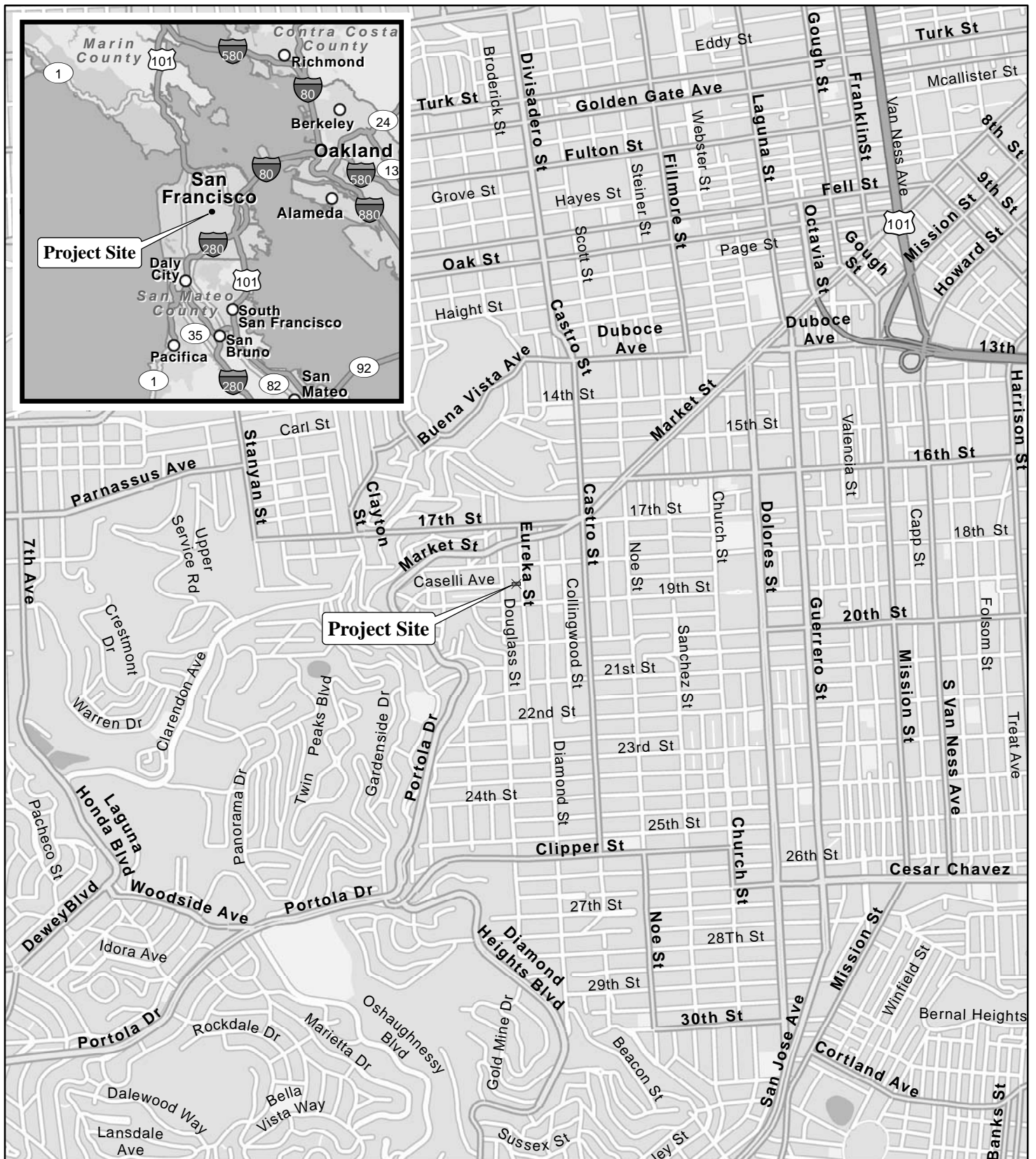
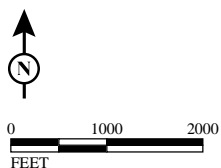


FIGURE II-1

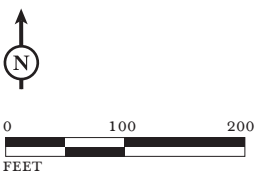


SOURCE: ESRI StreetMap North America (2012).

150 Eureka Street Project EIR
Project Location and Regional Vicinity Map



FIGURE II-2



 Project Site

150 Eureka Street Project EIR
Project Site and Surrounding Land Uses

SOURCES: GOOGLE EARTH, 4/5/16; LSA ASSOCIATES, INC., 2016.

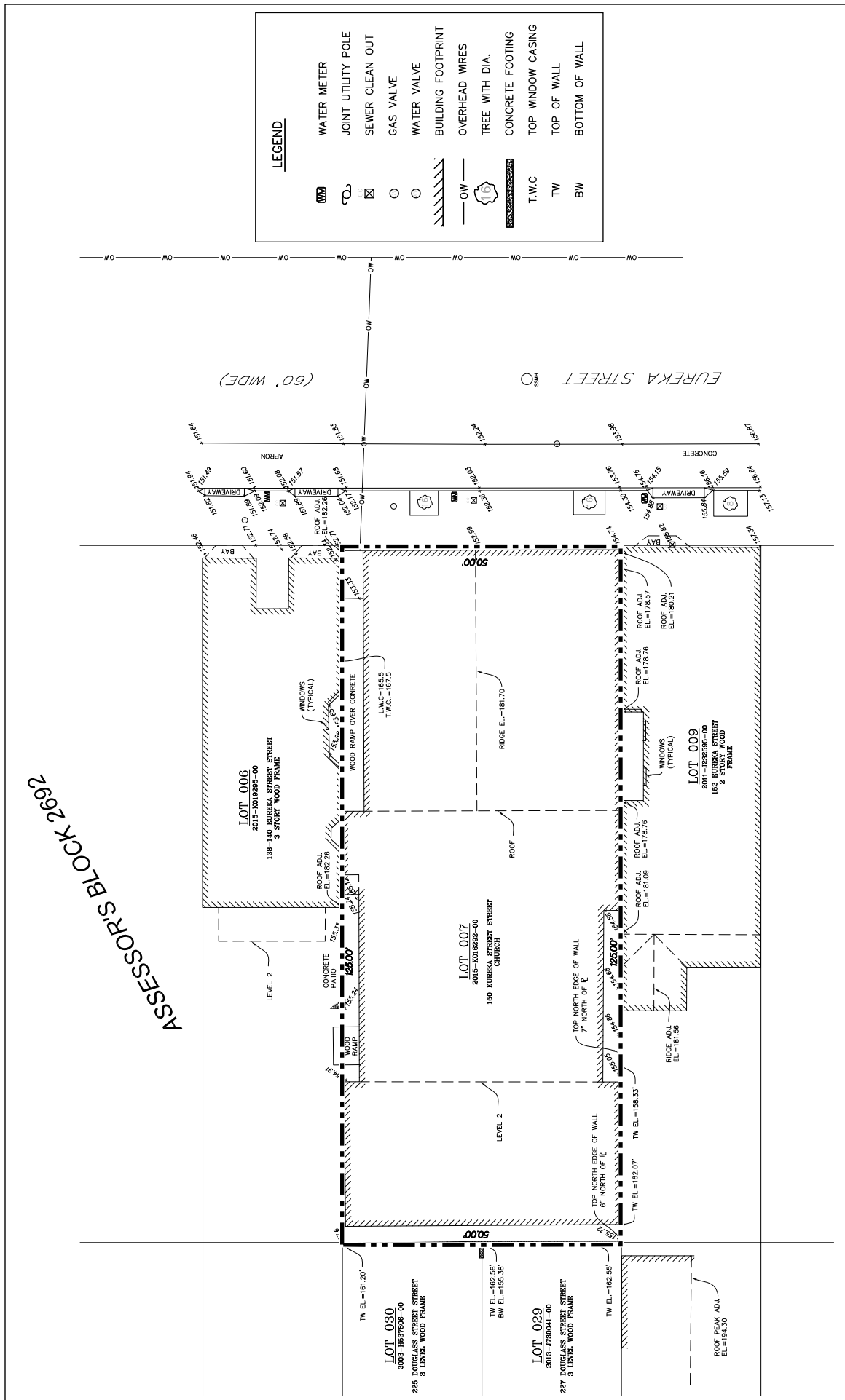


FIGURE II-3



Project Boundary

□

150 Eureka Street Project EIR
Existing Site Conditions

SOURCE: WESTOVER SURVEYING, 2016.

The existing building most recently housed the Metropolitan Community Church (MCC) of San Francisco, which consisted of a Lesbian, Gay, Bisexual, Transgender, Queer (LGBTQ) congregation from approximately 1970 to 2015. The building is currently vacant.¹ Structural reviews of the building found that there are major structural deficiencies in the building and that the building is not habitable in its current condition.^{2, 3, 4, 5, 6} The building is considered to be individually eligible for listing on the California Register of Historic Places due to its association with the city's LGBTQ community (refer to Section IV.A, Historic Architectural Resources, pp. 49–90, of this EIR for additional information).^{7,8}

PROPOSED PROJECT

The project sponsor proposes to demolish the existing building on the site, split the existing lot into two lots, and construct two, four-story buildings with a total of four residential units and eight ground floor parking spaces within a total building area of approximately 14,441 gsf. Each building would be a maximum of 40 feet tall. Landscaping is proposed along the building frontage on Eureka

¹ Annie Steinberg-Behrman, Provisional Pastor, MCC San Francisco. Written communication to San Francisco Planning Department Regarding 150 Eureka Street, San Francisco, CA, November 1, 2016. This document (and all other documents cited in this Environmental Impact 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. 2015-011274ENV.

² Santos & Urrutia Structural Engineers, *Soundness Report for Existing Building at 150 Eureka Street, San Francisco, California*, December 22, 2016.

³ Patrick Buscovich & Associates Structural Engineers, *Re: 150 Eureka, Job Number 06.182*, November 31, 2017.

⁴ Hohbach-Lewin, Inc. Structural and Civil Engineers, *Site Visit Observations/Recommendations, 150 Eureka Street*, March 24, 2014.

⁵ Lingruen Associates, *Wood Destroying Pests and Organisms Inspection Report, 150 Eureka Street, San Francisco*, December 29, 2014.

⁶ Reuben, Junius & Rose, LLP, *Summary of Structural Conditions for the 150 Eureka Street Building*, October 19, 2017.

⁷ Marcelle Boudreaux, Preservation Planner, San Francisco Planning Department, *Historic Resource Evaluation Response, 150 Eureka Street*, August 17, 2016.

⁸ Tim Kelley Consulting, LLC, *Part I Historical Resource Evaluation, 150 Eureka Street, San Francisco, California*, May 2015, Revised May 2016.

Street. In addition, an approximately 1,116-gsf rear yard and an approximately 263-gsf penthouse deck would provide on-site open space for use by project residents.

Figure II-4, p. 21, depicts the conceptual site plan for the proposed project. **Figures II-5 through II-8**, pp. 22–25 depict the floor plans for each individual building, referred to as “142-146 Eureka Street” and “148-150 Eureka Street”. **Figures II-9 and II-10**, pp. 26–27, illustrate the conceptual front and rear building elevations, respectively. **Figures II-11 and II-12**, pp. 28–29, depict representative building sections for the 142-146 Eureka Street and 148-150 Eureka Street buildings, respectively.

Project Building Characteristics

The proposed project would result in a lot split and construction of two, new immediately adjacent condominium buildings, each with four levels of living area within two separate residential units. The building at 142-146 Eureka Street would be approximately 6,604 gsf and the building at 148-150 Eureka Street would be approximately 6,570 gsf. As shown in **Figures II-5 through II-8**, pp. 22–25, within each building, one three-bedroom unit would occupy a portion of the ground level and the second level and one four-bedroom unit would occupy the third and fourth levels. Each individual unit would range from approximately 1,850 to 2,640 gsf in size. Approximately 275 gsf of indoor common areas would be provided within each building, consisting of building entry way, stairwells, and storage areas.

Each building would be set back between approximately 1 and 3.5 feet from the street front property line at grade and stepped back up to 10 feet from the building façade at the fourth level. Each building would be set back approximately 42 feet from the rear property line. Side yard setbacks would be approximately 4 feet wide and 12 feet deep at the ground level of the northwest building corner and 3 feet at the upper floors on the north and south.

Open Space and Landscaping

A total of approximately 2,736 square feet of common open space for use by project residents would be developed in the form of rear yards and penthouse decks as part of the proposed project. Specifically, the 142-146 Eureka Street site would include an approximately 1,116-square-foot rear

yard and an approximately 263-square-foot private penthouse deck for the upstairs unit. The 148-150 Eureka Street site would include an approximately 1,089-square-foot rear yard and an approximately 268-square-foot private penthouse deck for the upstairs unit. In addition, the project would include landscaping along the Eureka Street frontage and the two existing street trees would be retained.

An approximately 40-foot-long concrete retaining wall would be constructed on the south property line between the existing adjacent 152 Eureka Street and 148-150 Eureka Street rear yards. Beginning from the southwest corner of the 148-150 Eureka Street lot the wall would be 7 feet high and 27 feet long. After 27 feet, the retaining wall would step down to 3 feet, 6 inches high for the remaining length of 13 feet.

Access and Parking

Access to the site would be provided via Eureka Street. Resident access to each unit would be provided by a common entryway in each building and from within the ground-level garages. A total of eight parking spaces (four full sized and four compact) would be provided on site. The 142-146 Eureka Street building would provide approximately 1,182 gsf of indoor common garage area and the 148-150 Eureka Street building would provide approximately 1,158 gsf of common indoor garage area. Each garage would include two tandem spaces, for four vehicles each. In addition, each parking garage would provide two *class 1* bicycle parking spaces⁹. New curb cuts for each proposed garage access driveway would be 10 feet in width. Two of the three existing on-street parking spaces on the Eureka Street frontage would be removed to accommodate the new garage entrances, subject to approval by the San Francisco Municipal Transportation Agency (SFMTA).

⁹ Class 1 bicycle parking spaces are defined as facilities which protect the entire bicycle, its components and accessories, against theft and against inclement weather, including wind-driven rain. Class 2 bicycle parking spaces are defined as standard racks to which bicycles can be locked. Refer to Planning Code section 151.1 (quotation marks intentionally omitted here).

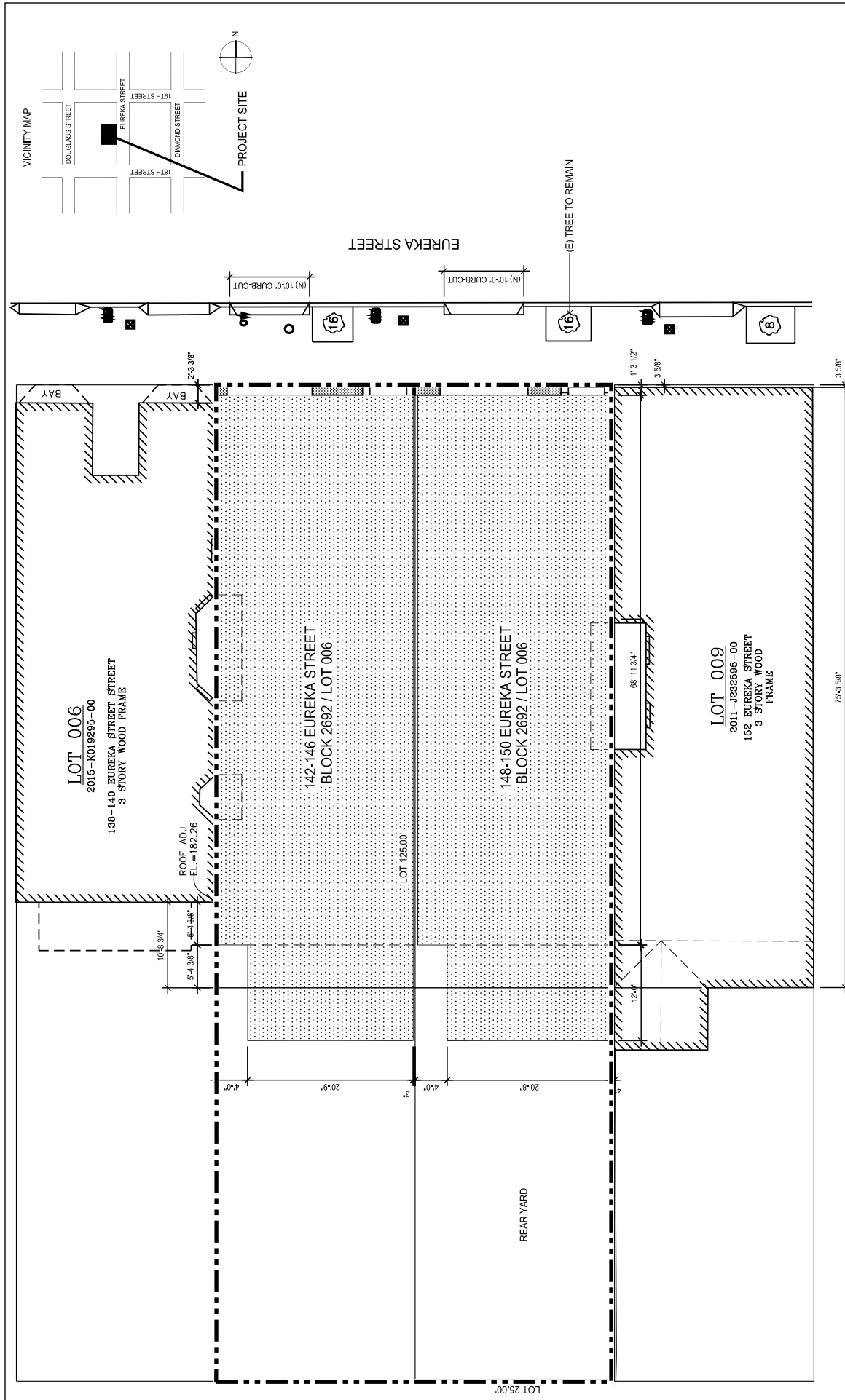


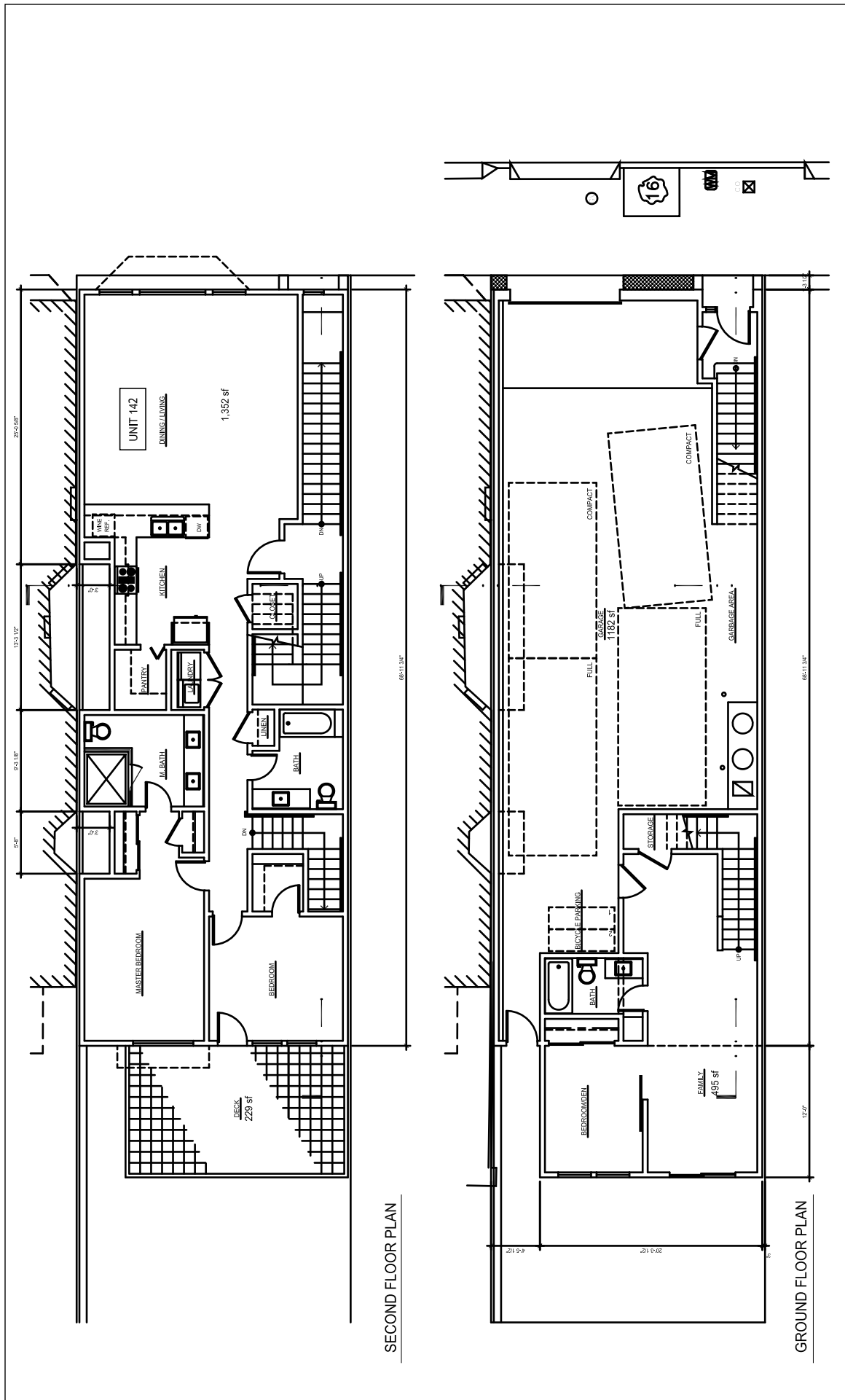
FIGURE II-4

Project Boundary

NOT TO SCALE

150 Eureka Street Project EIR
Conceptual Site Plan

SOURCE: GARY GEE, AIA, OCTOBER 2016.



NOT TO SCALE

142-146 Eureka Street - Conceptual Ground and Second Floor Plans

150 Eureka Street Project EIR

(SOURCE: GARY GEE, AIA, 2015).

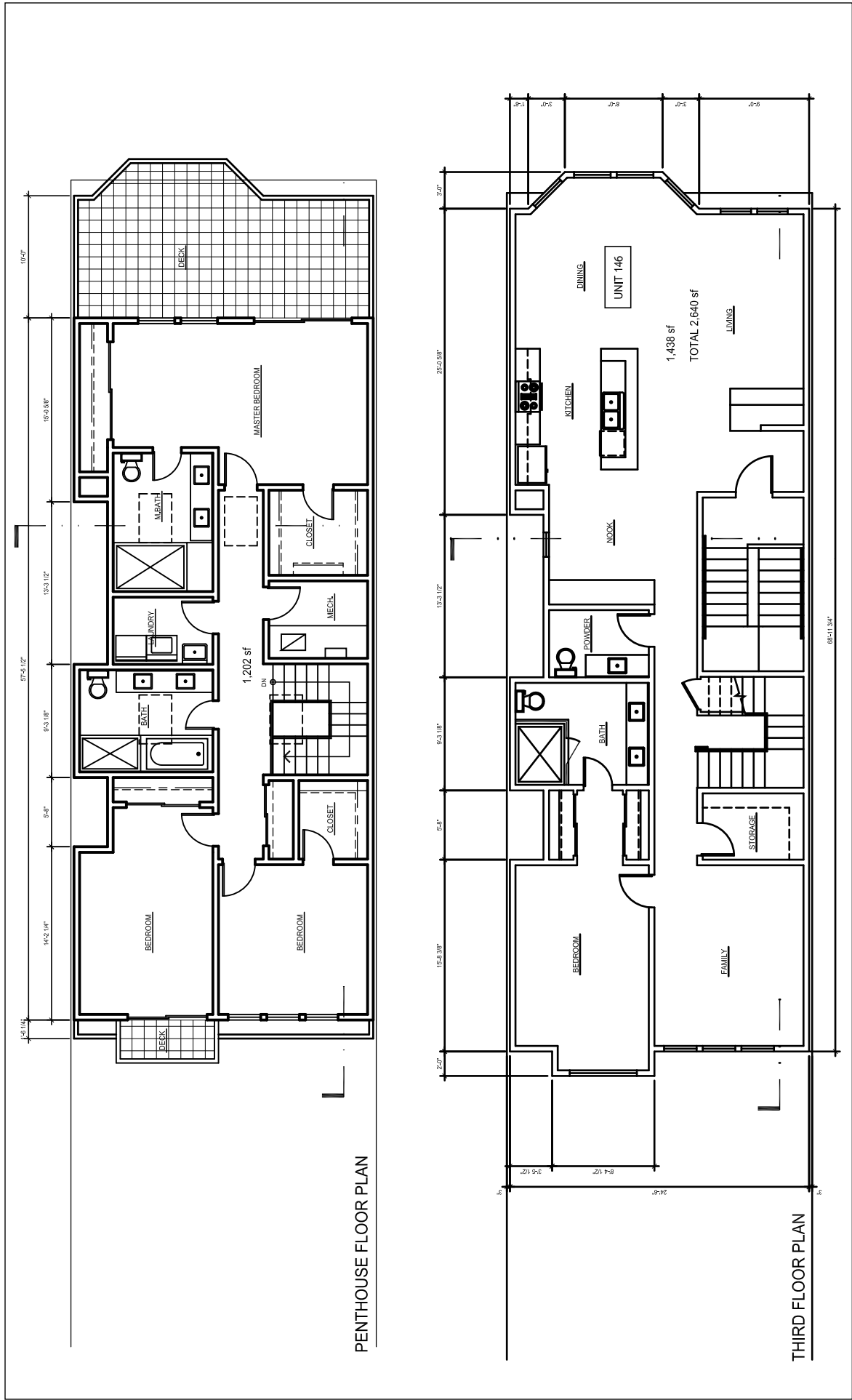


FIGURE II-6



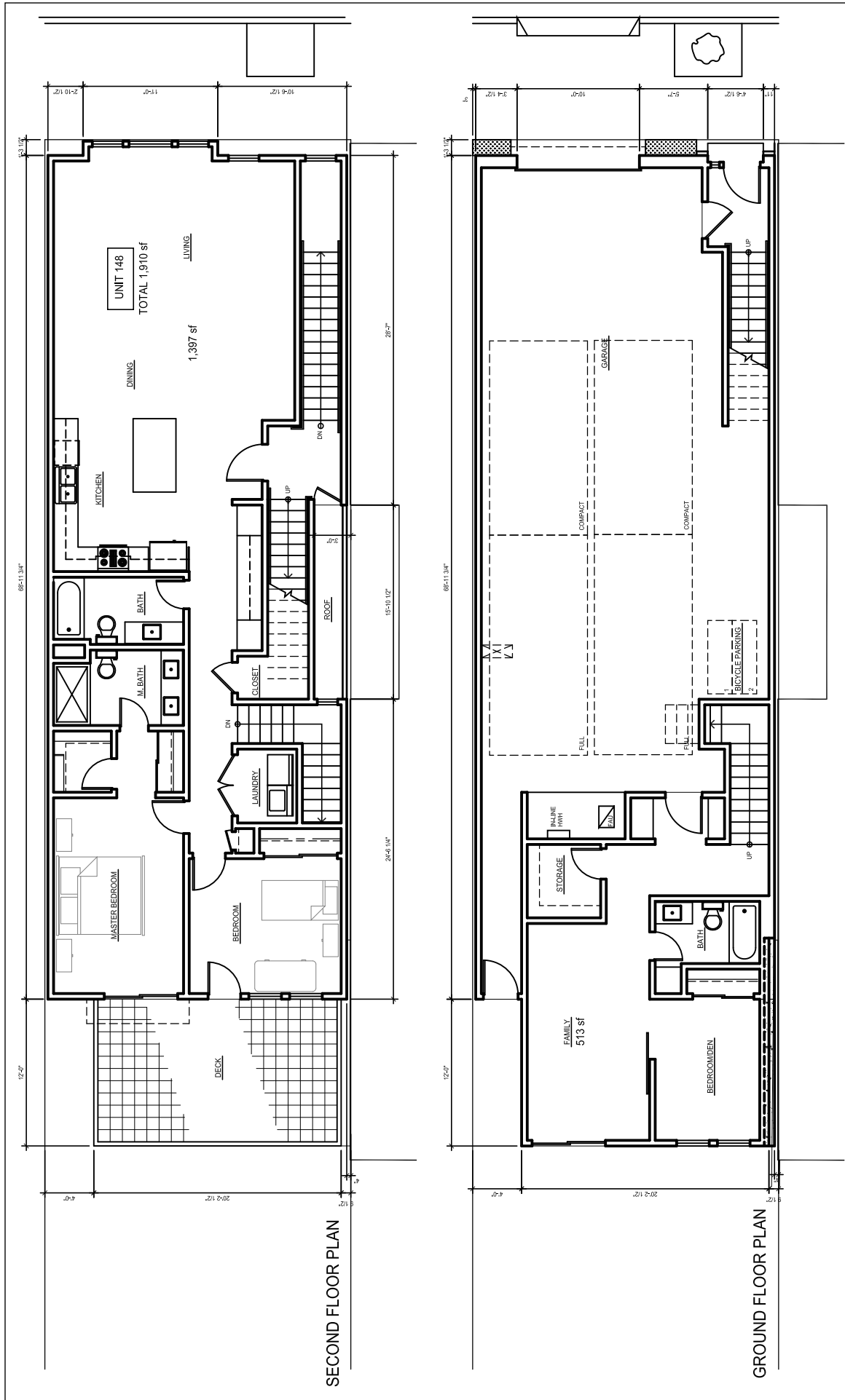


FIGURE II-7



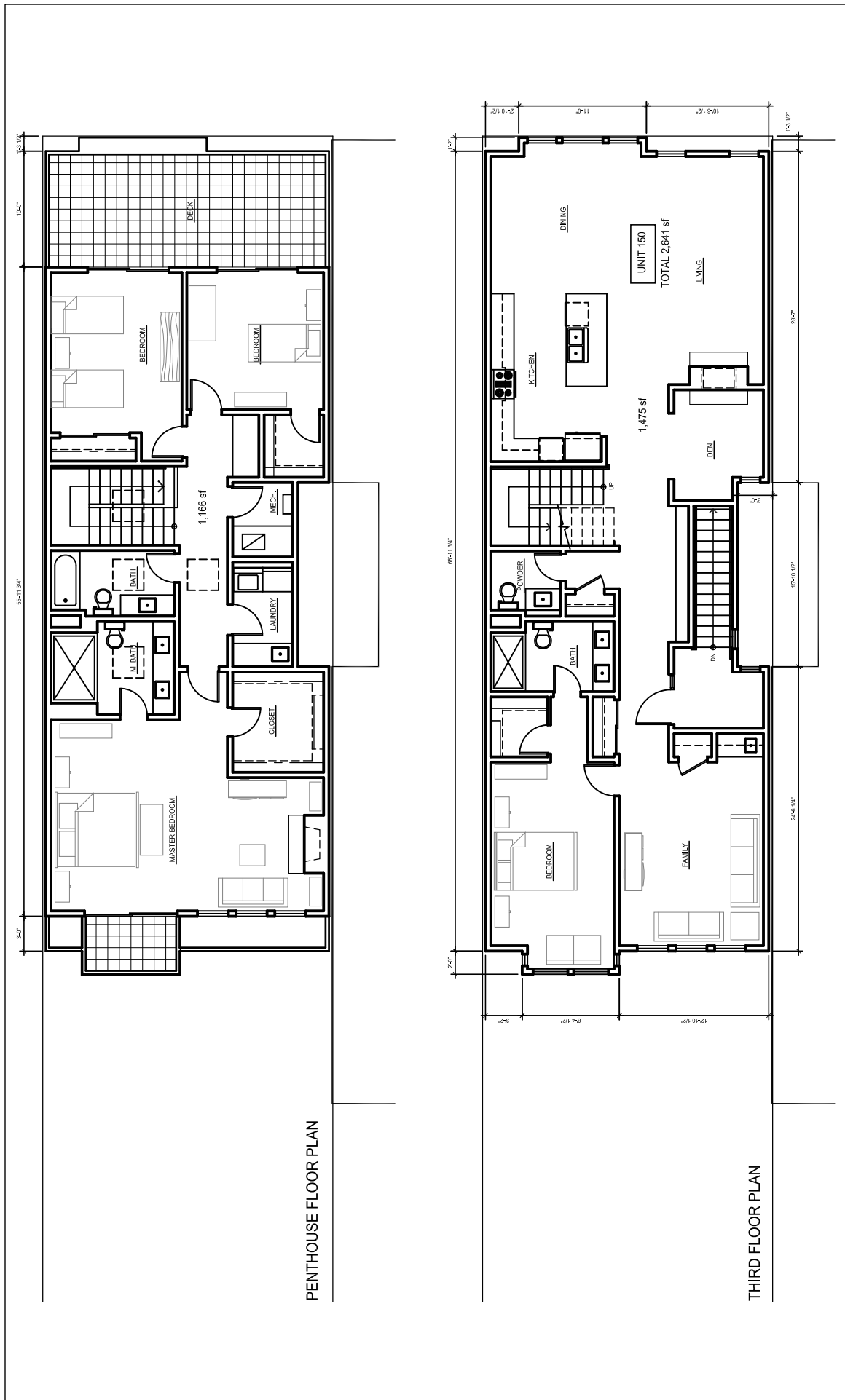


FIGURE II-8



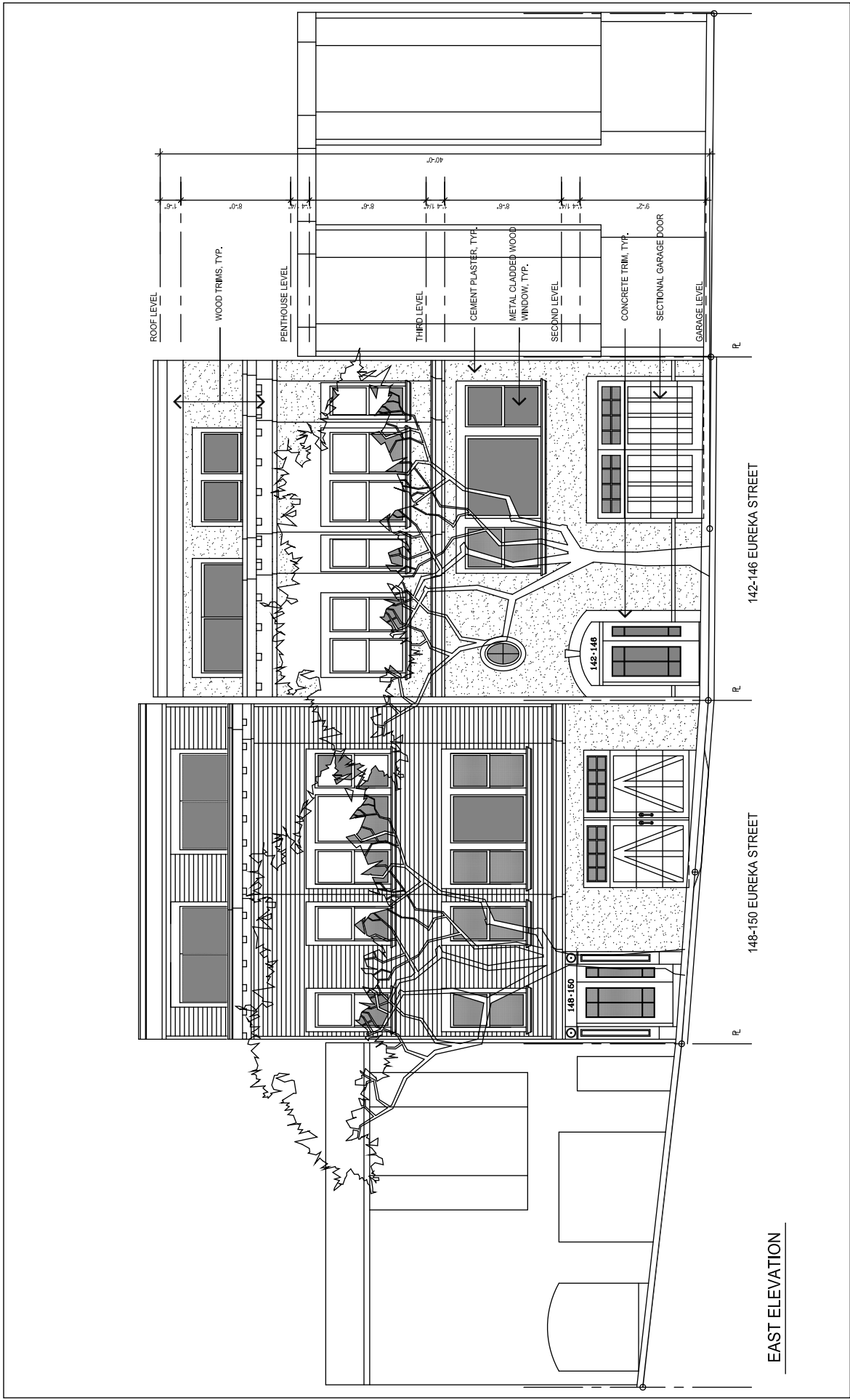


FIGURE II-9



FIGURE II-10

NOT TO SCALE

150 Eureka Street Project EIR
 Conceptual West (Rear) Elevations

SOURCE: GARY GEE, AIA, OCTOBER 2016.

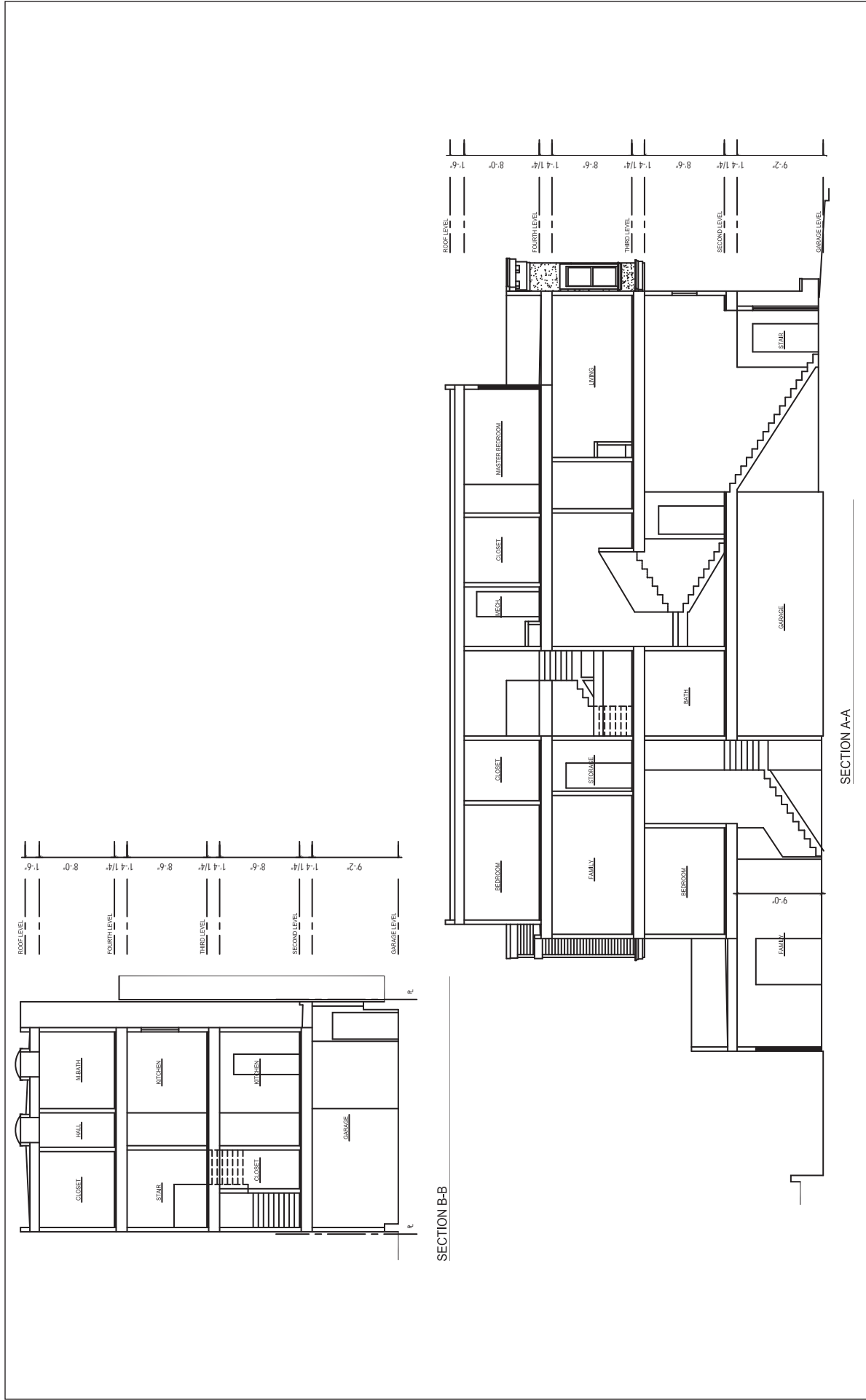


FIGURE II-11

NOT TO SCALE

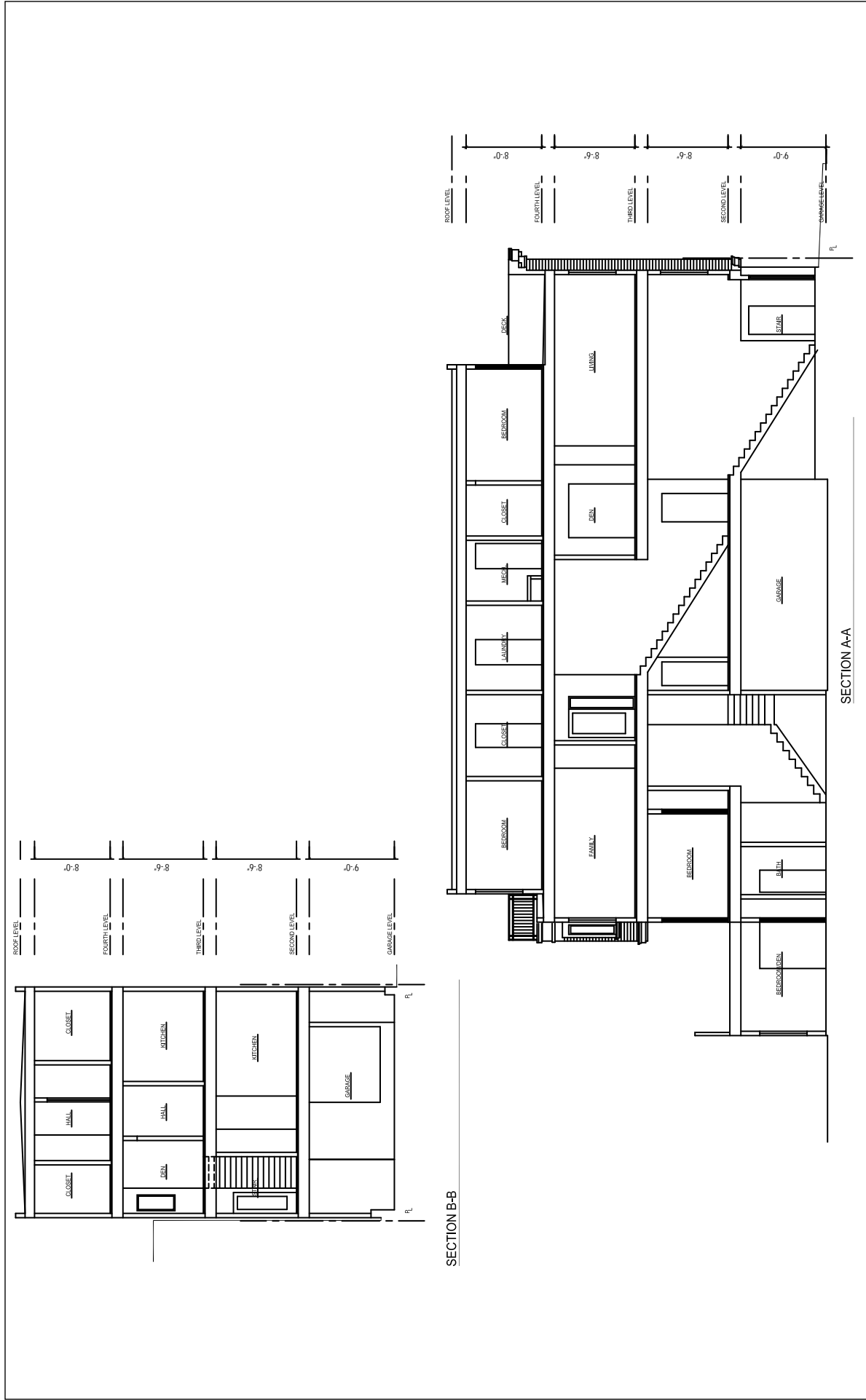


FIGURE II-12

NOT TO SCALE

Demolition and Construction

Construction activities at the project site would begin with demolition of the existing on-site structure and removal of all existing on-site pavements. A total of 6,000 cubic yards of soil would be excavated from the site to accommodate new foundations and utility connections. Construction of the proposed project is anticipated to occur over an 18 month period. The proposed project would connect to existing water, sewer, electrical, natural gas, and telecommunications connections available at the perimeter of the project site along Eureka Street. The two existing street trees that border the project site would be retained and protected during construction.

PROJECT SETTING

The project site occupies a parcel located midblock on Eureka Street between 18th and 19th streets within the Castro/Upper Market neighborhood in the City of San Francisco. Eureka Street is approximately 42 feet wide with vehicular traffic lanes in both the northbound and southbound directions. Parallel parking is available on both sides of the street. Douglass Street, located just east of the project site, is approximately 30 feet wide and runs parallel with Eureka Street with traffic lanes running in both the northbound and southbound directions. In addition, 18th Street is approximately 40 feet wide and 19th Street is approximately 35 feet wide, and each flow in eastbound and westbound directions. San Francisco Municipal Railway (Muni) bus stops are located in the project site vicinity at Eureka and 18th streets and Eureka and 19th streets. A *Class III* bicycle facility, which provides shared use of a roadway for bicycles and vehicles, is located on Eureka Street.¹⁰

The project site is located in the RH-2 (Residential House, Two-Family) residential zoning district. Existing uses within the same block as the 150 Eureka Street site consist primarily of two- to three-story medium-density residential uses located within the RH-2 district. Three-story residential uses border the site to the north and west and a two-story residential building borders the site to the south. Structures within the vicinity of the site and within the RH-2 district are typically finely-scaled

¹⁰ Bicycle facilities are defined by the State of California in the California Streets and Highway Code Section 890.4.

and usually do not exceed 25 feet in width or 40 feet in height. Building styles are often more varied than in single-family areas, but certain streets and tracts are quite uniform. Dwelling units within the vicinity have a considerable amount of ground-level open space available that is generally private. Residential uses within the vicinity have easy access to shopping facilities and transit lines. Uses near 18th and 19th streets consist of some neighborhood-serving commercial and office uses. In some cases, group housing and institutions are found within the RH-2 district, although nonresidential uses tend to be quite limited. **Figure II-2**, p. 16, identifies surrounding land uses within the vicinity of the site.

PROJECT APPROVALS

As previously noted, the project is located in the RH-2 residential zoning district and is also within the 40-X height and bulk district. The proposed project would require the following city, state, and regional approvals. These approvals may be considered in conjunction with the required environmental review, but will not be granted until the required environmental review has been completed:

Planning Commission

- Certification of the EIR, adoption of CEQA findings, and adoption of a mitigation and monitoring reporting program by the Planning Commission.

Actions by Other City Departments

- Approval of proposed removal of on-street parking spaces and new curb cuts by the SFMTA;
- Approval of demolition and building permits by the Department of Building Inspection (DBI);
- Approval of proposed condominiums and tentative subdivision maps; recommendation to the San Francisco Board of Supervisors for approval of a final subdivision map; and approval of proposed curb cuts by San Francisco Public Works (SFPW);

- Approval of permits for streetscape improvements in the public right-of-way, including two curb cuts on Eureka Street by SFPW; and
- Approval of dust control plan by the San Francisco Department of Public Health (DPH).

III. PLANS AND POLICIES

This chapter provides a summary of the relevant plans and policies of the City and County of San Francisco (city) that are applicable to the proposed project and focuses in particular on the project's potential inconsistencies with applicable plans and policies that could result in environmental impacts. Policy consistency determinations are ultimately made by the city's local decision-makers (i.e., planning commission and/or board of supervisors). This consideration of policies would occur independently of the environmental review process, as part of the decision to approve or reject the project. The analysis in this chapter is intended to provide decision-makers with a discussion of planning considerations that are pertinent to the proposed project and associated development site, and a preliminary conclusion regarding whether the project may be inconsistent with identified plans and policies. These preliminary conclusions are intended to supplement decision-makers' own understanding of the various and often-competing policy considerations.

A potential or actual conflict between a proposed project and a general plan policy does not, in and of itself, indicate a significant effect on the environment within the context of CEQA. A policy inconsistency is considered significant pursuant to CEQA only when it would result in a significant, adverse physical environmental impact. The potential instances of such conflicts are discussed in the topical section (i.e., Section IV.A, Historic Architectural Resources, pp. 49–90) of this draft EIR or in the NOP/IS (included in Appendix A).

The main documents that guide planning and land use within and around the project site are:

- San Francisco General Plan
- San Francisco Planning Code
- The Accountable Planning Initiative

Other local plans and policies applicable to development of the project site include the Sustainability Plan; Climate Action Plan ; Transit First Policy; Bicycle Plan; and Better Streets Plan. Regional plans and policies include the Transportation Sustainability Fee Ordinance; Plan Bay Area; Association of Bay Area Governments Projections 2013; Regional Housing Needs Plan for the San Francisco Bay Area: 2014-2022; Clean Air Plan; and San Francisco Basin Plan.

Environmental plans and policies are those, like the Bay Area 2017 Clean Air Plan, which directly address environmental issues and/or contain targets or standards that must be met in order to preserve or improve the characteristics of the city's physical environment. The proposed project would not obviously or substantially conflict with any such adopted environmental plan or policy. The project's conformance with the general plan, planning code, and the Accountable Planning Initiative are discussed below. Compliance with other local plans and policies and regional plans and policies are discussed in the specific topical section of this EIR, as appropriate, or in the NOP/IS (included in Appendix A) in section F, Compatibility with Zoning and Plans, pp. 20-26.

Potential inconsistencies with the San Francisco General Plan and Accountable Planning Initiative are discussed below. No inconsistencies with the other plans and policies listed above were identified.

SAN FRANCISCO GENERAL PLAN

The San Francisco General Plan (the general plan) establishes objectives and policies to guide land use decisions related to physical development in the city. The general plan is comprised of 10 elements, each of which addresses a particular topic that applies citywide: air quality; arts; commerce and industry; community facilities; community safety; environmental protection; housing; recreation and open space; transportation; and urban design. The general plan elements provide goals, policies, and objectives for the physical development of San Francisco.

City decision-makers will evaluate the proposed project in the context of the general plan, and as part of the project review process will consider potential conflicts. The consideration of general plan objectives and policies would take place independently of the environmental review process. Any

potential conflict not identified in this draft EIR would be considered in that context and would not alter the analysis of physical environmental impacts found in this draft EIR.

As discussed below, the proposed project could be inconsistent with certain aspects of the general plan's urban design element related to conserving resources which provide a sense of continuity with the past.

The proposed project would include demolition of the existing building at 150 Eureka Street, which is considered a historic resource under CEQA because, as described above, it has been determined to be individually eligible for listing on the CRHR, due to its association with the city's LGBTQ community. As such, the proposed project would conflict with policy 2.4 of the urban design element, which calls for the preservation of notable landmarks and areas of historic, architectural, or aesthetic value. The associated physical environmental impacts that could result from this conflict are discussed in Section IV.A, Historic Architectural Resources, pp. 49–90, of this EIR. As discussed, the proposed project would demolish a historic architectural resource and, even with implementation of **Mitigation Measures M-CR-1a and M-CR-1b**, this impact would be significant and unavoidable.

Except for the potential conflict related to the demolition of the building on the project site, which is considered a historic resource under CEQA due to its eligibility for listing on the CRHR, the proposed project would not obviously or substantially conflict with any goals, policies, or objectives of the general plan.

SAN FRANCISCO PLANNING CODE

The San Francisco Planning Code (planning code) incorporates by reference the city's zoning maps, governs permitted uses, densities, and the configuration of buildings within San Francisco. Permits to construct new buildings (or to alter and demolish existing ones) may not be issued unless: (1) the proposed project conforms to the planning code; (2) allowable exceptions are granted pursuant to provisions of the planning code; or (3) legislative amendments to the planning code are included as part of the proposed project.

The project is located in the RH-2 (Residential House, Two-Family) residential zoning district and within the 40-X height and bulk district. The following section describes the proposed project's consistency with the land use districts and use, bulk, height, and other regulations associated with the project site. As discussed, implementation of the proposed project would not require the adoption of any legislative amendments to the provision of the planning code or zoning maps and, as currently proposed, the proposed project conforms to the use, density, height and other restrictions of this zoning classification.

Use District

As previously discussed, the project site is located within the RH-2 zoning district. As stated in Planning Code section 209.1, the RH-2 district consists of one-family and two-family houses. The RH-2 district allows up to two dwelling units per lot and up to one unit per 1,500 square feet of lot area with conditional use approval. The proposed project would result in the development of four residential units within two buildings on the existing 6,246-square-foot lot. The project would require a lot split to allow for development of the four units under the RH-2 district. Within the RH-2 district, the proposed residential uses are principally permitted.

Setbacks

Section 132 of the planning code requires that where one or both of the buildings adjacent to the subject property have front setbacks along a street or alley, any building or addition constructed, reconstructed or relocated on the subject property shall be set back to the average of the two adjacent front setbacks. If only one of the adjacent buildings has a front setback, or if there is only one adjacent building, then the required setback for the subject property shall be equal to one-half the front setback of such adjacent building. When front setbacks are based on adjacent properties, the setback shall not exceed 15 feet. For the proposed project, each building would be set back between approximately 1 and 3.5 feet from the street front property line at grade and stepped back up to 10 feet from the building façade at the fourth level. Adjacent buildings are stepped back from the property line between approximately 2 feet, 3 inches and 3 feet. Per planning code section 134, the minimum rear yard depth within the RH-2 district is required to be 45 percent of the lot depth or the

average of the depth of the two adjacent rear yards, whichever is less. At the project site, each building would be set back approximately 42 feet from the rear property line, which is based on the average rear set back of adjacent properties, which is between approximately 60 feet, 1 inch and 49 feet, 4 inches. The planning code does not require side yard setbacks in the RH-2 district. At the project site, side yards would be provided at approximately 4 feet wide and 12 feet deep at the ground level of the northwest building corner and 3 feet at the upper floors on the north and south. .

Street Trees

The purpose of planning code section 138.1 is to “establish requirements for the improvement of the public right-of-way associated with development projects, such that the public right-of-way may be safe, accessible, convenient and attractive to pedestrian use and travel by all modes of transportation consistent with the San Francisco General Plan, achieve best practices in ecological stormwater management, and provide space for public life and social interaction, in accordance with the city's ‘Better Streets Plan.’” The Better Streets Plan governs the design, location, and dimensions of all pedestrian and streetscape items in the public right-of-way, including crosswalks, bulbouts, street furniture, planters, and trees. One 24-inch box size street tree must be installed for each 20 feet of frontage along each street or alley, with any remaining fraction of 10 feet or more of frontage requiring an additional tree, unless a waiver is granted because inadequate sidewalk width, utilities, or driveways make installation impractical.

The proposed project does not include the removal of any on-site or off-site trees as part of project construction. The proposed project would include landscaping along Eureka Street and the two existing street trees located along the approximately 32-foot-long Eureka Street frontage would be retained.

Open Space

Section 135 of the planning code specifies the amount of usable open space required to be supplied by new residential development in the RH-2 zoning district. “Private usable open space” is defined as areas private to and designed for use by only one dwelling unit; “common usable open space” is defined as an area or areas designed for joint use by two or more dwelling units. The usable open space requirement in the RH-2 district is 125 square feet per dwelling unit if private, plus one-third more for any portion of usable open space that is common.

The proposed project would require 500 square feet of private open space, or 665 square feet of common open space. The proposed project would contain approximately 2,736 square feet of common open space for project residents in the form of rear yards and penthouse decks. Specifically, the 141-146 Eureka Street site would include an approximately 1,116-square-foot rear yard and an approximately 263-square-foot private penthouse deck for the upstairs unit. The 148-150 Eureka Street site would include an approximately 1,089-square-foot rear yard and an approximately 268-square-foot private penthouse deck for the upstairs unit. The proposed project would therefore provide the required amount of open space.

Vehicle and Bicycle Parking

According to Planning Code section 151, two off-street parking spaces are permitted per dwelling unit. As the proposed project would include four dwelling units, the project would be allowed to provide eight off-street parking spaces. Thus, the proposed eight off-street parking spaces (four per building) would comply with planning code section 151. Planning code section 155.2 requires new residential buildings to provide one secured (*class 1*) bicycle parking space per each dwelling unit. The proposed project would provide two *class 1* bicycle parking spaces in each garage (for a total of four spaces, one for each dwelling unit). Given the above, the proposed project would not conflict with the parking requirements outlined in the planning code.

Height and Bulk District

The project site is located within 40-X height and bulk district. Per Article 2.5 of the planning code, the 40-X height and bulk district allows a maximum building height of 40 feet across the project site, as measured from the curb level adjacent to a building (pursuant to planning code section 102.12). The proposed project would be a maximum of 40 feet in height. Bulk controls reduce the size of a building's floorplates as the building increases in height. Pursuant to planning code section 270(a), there are no bulk controls in an "X" bulk district. Therefore, the proposed structure would comply with existing height and bulk controls.

ACCOUNTABLE PLANNING INITIATIVE

In November 1986, the voters of San Francisco approved Proposition M, the Accountable Planning Initiative, which added section 101.1 to the planning code to establish eight priority policies. The priority policies are also incorporated into the preamble to the general plan, which provides that the priority policies "shall be the basis upon which inconsistencies in the General Plan are resolved." The priority policies are related to: (1) preservation and enhancement of neighborhood-serving retail uses; (2) protection of neighborhood character; (3) preservation and enhancement of affordable housing; (4) discouragement of commuter automobiles; (5) protection of industrial and service land uses from commercial office development and enhancement of resident employment and business ownership; (6) maximization of earthquake preparedness; (7) landmark and historic building preservation; and (8) protection of open space. The priority policies, which provide general policies and objectives to guide certain land use decisions, contain certain policies that relate to physical environmental issues. Where appropriate these issues are discussed in the topical sections of the NOP/IS (Appendix A) or this EIR.

Prior to issuing a permit for any project which requires an initial study or EIR under CEQA; prior to issuing a permit for any demolition, conversion, or change of use; and prior to taking any action which requires a finding of consistency with the general plan, the city is required to find that the proposed project would generally be consistent with the priority policies. As noted above, the

physical environmental effects of the project as they may relate to the priority policies are addressed in the analyses in the NOP/IS or in the topical section of this draft EIR.

The proposed demolition of the existing building on the project site, which has been identified as a historical resource under CEQA, could be inconsistent with the above policy that calls for the preservation of landmarks and historic buildings. However, the proposed project would provide housing on the site, which is compatible with the existing uses in the vicinity. The proposed project would not conflict with other general plan policies, including the other priority policies added by the Accountable Planning Initiative. Independent of the environmental review process, the planning department's analysis of the proposed project will include a more detailed analysis regarding general plan and priority policy consistency for consideration by city decision-makers.

SUMMARY

Based upon the discussion presented in this chapter, the proposed project could potentially conflict with policies in the urban design element of the general plan and the Accountable Planning Initiative related to the preservation of historic resources (because the project would result in the demolition of a historic resource as defined by CEQA). As discussed above and in the NOP/IS, the proposed project also implements various policies of the general plan, particularly those related to infill development, and residential housing production. City decision-makers will ultimately make a consistency determination as part of the project approval process.

IV. ENVIRONMENTAL SETTING, IMPACTS AND MITIGATION MEASURES

This chapter provides a project-level analysis of the physical environmental effects that could occur with implementation of the proposed project as identified in the Notice of Preparation/Initial Study (NOP/IS) (included in Appendix A). This chapter provides an overview of the process for evaluation of significant environmental effects, the format of and approach to the environmental analysis, and the general environmental setting within the vicinity of the site and the cumulative project setting. Section A of this chapter describes the environmental setting of the project site related to historic architectural resources and the impacts which may result. Mitigation measures to reduce potential impacts are identified, where appropriate.

The project sponsor, 150 Eureka Street LLC, filed an application on August 17, 2015, for the environmental evaluation of the proposed project. Based on the NOP/IS published on May 24, 2017, the San Francisco Planning Department determined that an EIR is required. The NOP/IS concluded that many of the physical environmental effects of the proposed project would be less than significant or implementation of mitigation measures agreed to by the project sponsor would reduce significant impacts to a less-than-significant level. Therefore, CEQA does not require further assessment of the project's less-than-significant impacts that fall into the following topical areas: land use and land use planning; aesthetics; population and housing; cultural resources (archaeological resources, tribal cultural resources, and human remains); transportation and circulation; noise; air quality; greenhouse gas emissions; wind and shadow; utilities and service systems; public services; biological resources; geology and soils; hydrology and water quality; mineral and energy resources; and agriculture and forest resources. Please refer to the initial study in Appendix A for a discussion of these topics. The NOP/IS found potentially significant project-specific and cumulative impacts related to historic architectural resources. Accordingly, this topic is evaluated in this EIR.

DETERMINATION OF SIGNIFICANCE

Under CEQA, a significant effect is defined as a substantial, or potentially substantial, adverse change in the environment. The guidelines implementing CEQA direct that this determination be based on scientific and factual data, including the entire record for the project, and not on argument, speculation, or unsubstantiated evidence. Each impact and mitigation measure section of this chapter is prefaced by certain criteria that have been developed by the planning department for use in determining whether an impact is significant.

Impacts are categorized by type of impact as follows:

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

FORMAT OF ENVIRONMENTAL ANALYSIS

The historic architectural resources environmental topic considered in this chapter comprises three primary sections: 1) environmental setting; 2) regulatory framework; and 3) impacts and mitigation measures. An overview of the general organization and the information provided in the three sections is provided as follows:

- **Regulatory Framework.** The regulatory framework provides an overview of the federal, State, and local regulations (as applicable) that relate to the topic of historic architectural resources.
- **Environmental Setting.** The environmental setting section provides a description of the baseline physical setting for the project site and its surroundings that existed at the time the proposed project's NOP/IS was published (e.g., existing historic resources).
- **Impacts and Mitigation Measures.** The impacts and mitigation measures section presents a discussion of the impacts (i.e., the changes to baseline physical environmental conditions) that could result from implementation of the proposed 150 Eureka Street project. The section begins with the criteria of significance, which establish a way of determining whether an impact is significant. The latter part of this section presents the impacts from the proposed project and mitigation measures, if required. The impacts of the proposed project are organized into separate categories based on the criteria listed in each topical section. Project-specific impacts are discussed first, followed by cumulative impacts.

Impacts are numbered and shown in bold type, and the corresponding mitigation measures, where identified, are numbered, indented, and follow impact statements. Impacts and mitigation measures are numbered consecutively within each topic and begin with an abbreviated reference to the impact section (e.g., CR). The following symbols are used for individual topics:

CR: Historic Architectural Resources

PROJECT SETTING

The existing land use setting is provided in Chapter II, Project Description, and is summarized below for information purposes to orient the reader to the surrounding context of the project site.

The project site occupies a parcel located midblock on Eureka Street between 18th and 19th streets within the Castro/Upper Market neighborhood in the City of San Francisco. Eureka Street is approximately 42 feet wide with vehicular traffic lanes in both the northbound and southbound directions. Parallel parking is available on both sides of the street. Douglass Street is approximately 30 feet wide and runs parallel with Eureka Street with traffic lanes running in both the northbound and southbound directions. In addition, 18th Street is approximately 40 feet wide and 19th Street is approximately 35 feet wide, and each flow in eastbound and westbound directions. San Francisco Municipal Railway (Muni) bus stops are located in the project site vicinity at Eureka and 18th streets and Eureka and 19th streets. A *Class III* bicycle facility, which provides shared use of a roadway for bicycles and vehicles, are located on Eureka Street.¹

Existing uses within the same block as the 150 Eureka Street site consist primarily of two- to three-story medium-density residential uses. Three-story residential uses border the site to the north and west and a two-story residential building borders the site to the south. Uses near 18th and 19th streets consist of some neighborhood-serving commercial and office uses. **Figure II-2**, p. 16, identifies surrounding land uses within the vicinity of the site.

APPROACH TO ANALYSIS

The historic resources analysis includes an evaluation of the potential environmental impacts associated with implementation of the proposed project. As described in Chapter II, Project Description, pp. 13–32 the proposed project would result in the demolition of the existing two-story

¹ Bicycle facilities are defined by the State of California in the California Streets and Highway Code Section 890.4.

former church building. Project-related construction and operation impacts are identified, where applicable. In addition, remediation activities that would occur at the project site prior to building demolition and building construction are also evaluated for associated environmental impacts.

CUMULATIVE ANALYSIS

Approach

CEQA defines cumulative impacts as “two or more individual effects, which, when considered together, are considerable, or which can compound or increase other environmental impacts.” Section 15130 of the CEQA Guidelines requires that an EIR evaluate potential environmental impacts that may be individually limited but cumulatively significant. These impacts could result from the proposed project alone, or together with other projects. The CEQA Guidelines state: “The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects.” Cumulative impacts could result from individually minor but collectively significant projects taking place over time.

For the evaluation of cumulative impacts, CEQA allows the use of either a list of past, present, or reasonably anticipated relevant projects, including projects outside the control of the lead agency, a summary of the projections in an adopted planning document, or a combined list-based and growth projections approach. For the 150 Eureka Street project, the cumulative analysis primarily relies on a list of past, present, and reasonably foreseeable cumulative development projects within a 0.25-mile radius of the project site.

Setting

Past, present, and reasonably foreseeable cumulative development projects within a 0.25-mile radius of the project site include a number of residential additions and renovations, as well as new construction. **Table IV-1** includes a list of all cumulative development projects in the vicinity identified at the time of publication of the NOP/IS. Of those cumulative projects, only those at 4517

18th Street, 160 Caselli Drive, 132 Corbett Avenue, 4360 19th Street, 53 States Street, and 4072 18th Street would intensify land uses in the vicinity. In total, these cumulative projects would result in the addition of eight residential units. These cumulative projects are either under construction or the subject of an Environmental Evaluation Application on file with the planning department. This list of cumulative projects was used for the initial study, generally, and as relevant to this draft EIR. The status of these cumulative projects was also reviewed and updated after publication of the initial study and prior to publication of the draft EIR.

Table IV-1: Cumulative Projects in the Project Vicinity

Address	Case No.	Project Status– Environmental Review	Net New Dwelling Units	Description
4517 18th St (1 block away)	2016-014999	Under Way	1	New accessory dwelling unit
433 Douglass St (2 blocks away)	2016-008861PRJ	Complete	0	Vertical Addition - new level
112 Yukon St (4 blocks away)	2016-011349PRJ	Under Way	1	Vertical Addition - new level
160 Caselli Ave (3 blocks away)	2016-010185	Complete	1	Demolition of existing single-family home and construction of 3-story building
52 Yukon St (4 blocks away)	2016-012625ENV	Complete	0	Horizontal rear expansion at each level
4565 19th St (2 blocks away)	2016-011618ENV	Complete	0	Vertical Addition - new level
316 Douglass St (2 blocks away)	2015-006957ENV	Complete	0	Vertical Addition - new level
335 Diamond St (3 blocks away)	2016-003609ENV	Complete	0	Horizontal addition - expansion of third level
4618 19th St (3 blocks away)	2015-012303ENV	Complete	0	Horizontal rear expansion at each level
4612 19th St (3 blocks away)	2015-012021ENV	Complete	0	Vertical Addition - new level
316 Douglass St (2 blocks away)	2015-006957ENV	Complete	0	Vertical Addition - new level
219 Douglass St (1 block away)	2016-013500PRJ	Complete	0	Horizontal addition - expansion of ground level
132 Corbett Ave (5 blocks away)	2014.0016	Complete	1	New 3-story single family dwelling
4547 19th St (2 blocks away)	2016-011925PRJ	Complete	0	Vertical addition
4360 19th St (1 block away)	2016-011673	Under Way	1	Change of use to add a unit

Table IV-1: Cumulative Projects in the Project Vicinity

Address	Case No.	Project Status– Environmental Review	Net New Dwelling Units	Description
53 States St (6 blocks away)	2014-000018PRJ	Complete	2	Demolish single-family home and construct two unit building
4072 18th St (4 blocks away)	2014-003036PRJ	Under Way	1	Horizontal addition and new dwelling unit
333 Diamond St (3 blocks away)	2016-014677ENV	Complete	0	Vertical Addition - new level
18 Romain St (4 blocks away)	2015-005537PRJ	Under Way	0	Vertical addition - expansion of second level
Total			8	

Source: San Francisco Planning Department, *Cumulative Projects List*. December 15, 2016; updated October 27, 2017.

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A. HISTORIC ARCHITECTURAL RESOURCES

A “historical resource” is defined in CEQA Guidelines section 15064.5(a) as including one that is listed in, or determined eligible for listing in, the California Register of Historical Resources (CRHR). This subsection describes historic architectural resources within the project site, identifies potential historic architectural resources in the vicinity of the project site, and evaluates potential direct and indirect impacts to those resources that could result from the proposed project.

For the purposes of this EIR, the term “historic architectural resource” is used to distinguish such resources from archaeological resources, which may also be considered historical resources under CEQA. The Notice of Preparation/Initial Study (NOP/IS) (included as Appendix A to this EIR), pp. 36–44, determined that the project would not cause adverse impacts to potential archeological resources, tribal cultural resources, and human remains that may be present within the project site. Therefore, further discussion of archeological resources, tribal cultural resources, and human remains is not required in this EIR.

Project impacts on a “historical resource”, as defined by CEQA Guidelines section 15064.5, are analyzed in a two-step process. The first step determines whether a project may impact a resource that falls within the definition of “historical resource” under CEQA. If the project may impact a historical resource, the second step determines whether the project would cause a “substantial adverse change in the significance of the historical resource.” A project that may cause a substantial adverse change in the significance of a historical resource is one that may have significant effect on the environment (CEQA Guidelines section 15064.5(b)(1)(2)). Thus, this subsection has two parts. The setting discussion examines the potential for the presence of historical resources within the project site and a radius of 0.25 miles. The impacts discussion evaluates the impacts of the proposed project on the historical resources identified in the setting discussion.

Unless otherwise noted, this historic architectural resources section is generally based on the Historic Resource Evaluation (HRE) prepared by an independent historic architectural resource consultant,

Tim Kelley Consulting LLC¹ and the determination of the Historic Resource Evaluation Response (HRER) prepared by the San Francisco Planning Department (planning department).²

Regulatory Framework

This subsection describes the pertinent federal, state, and local laws and regulations that pertain to the identification and regulation of historic architectural resources.

Federal

National Register of Historic Places. The National Register of Historic Places (NRHP) is the nation's master inventory of cultural resources worthy of preservation. It is administered by the National Park Service, which is represented at the state level by the state historic preservation officer. The NRHP includes listings of buildings, structures, sites, objects, and districts that possess historic, architectural, engineering, archaeological, or cultural significance at the federal, state, or local level. Resources that are listed on or have been found by the state historic preservation officer to be eligible to the NRHP are called historic properties. The NRHP includes four evaluative criteria to determine eligibility of a historic property.

The quality of significance in American history, architecture, archaeology and culture is present in districts, sites, buildings, structures, and objects of state and local importance that possess integrity of location, design, setting, materials, workmanship, feeling and association, and meet the follow criteria:

- a. are associated with events that have made a significant contribution to the broad patterns of history; or

¹ Tim Kelley Consulting, LLC, *Historic Resource Evaluation*, 150 Eureka Street, San Francisco, May 2015, Revised May 2016.

² San Francisco Planning Department, *Historic Resource Evaluation Response*, 150 Eureka Street, August 17, 2016.

- b. are associated with the lives of persons significant in our past; or
- c. embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
- d. have yielded or may likely yield information important in prehistory or history.

Criteria for the NRHP, specified in the Code of Federal Regulations (CFR), are similar to the CRHR (discussed below), but are lettered a-d (36 CFR Part 60.4). Integrity entails the survival of characteristics or historic fabric that existed during the resource's period of significance; that is, the time it gained its historical importance. Integrity encompasses seven aspects: location, design, materials, workmanship, setting, feeling, and association (Public Resources Code section 5024.1(b); 36 CFR Part 60.4). Although there are exceptions, certain kinds of resources are not usually considered for listing in the NRHP: religious properties, moved properties, birthplaces and graves, cemeteries, reconstructed properties, commemorative properties, and properties that have achieved significance within the past 50 years.

In addition to qualifying for listing under at least one of the evaluative criteria of the NRHP, a property must possess sufficient integrity to be considered eligible for inclusion in the NRHP. According to National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation, integrity is defined as "the ability of a property to convey its significance." The National Register Bulletin defines seven characteristics of integrity as follows:

1. *Location* is the place where the historic property was constructed;
2. *Design* is the combination of elements that create the form, plans, space, structure and style of the property;
3. *Setting* addresses the physical environment of the historic property inclusive of the landscape and spatial relationships of the buildings;

4. *Materials* refer to the physical elements that were combined or deposited during a particular period of time and in a particular pattern of configuration to form the historic property;
5. *Workmanship* is the physical evidence of the crafts of a particular culture or people during any given period in history;
6. *Feeling* is the property's expression of the aesthetic or historic sense of a particular period of time; and
7. *Association* is the direct link between an important historic event or person and a historic property.

According to National Register Bulletin 15, "[t]o retain historic integrity a property will always possess several, and usually most, of the aspects."

State

California Environmental Quality Act. CEQA defines a "historical resource" as a resource that is listed in, or determined eligible for listing in, the CRHR. A resource is presumed a historical resource, absent evidence to the contrary, if it is identified as significant in a local register of historical resources or identified in a historical resources survey meeting state requirements. Finally, a lead agency may determine that a resource is a historical resource based on other information.

CEQA applies to all discretionary projects undertaken or subject to approval by the state's public agencies.³ CEQA states that it is the policy of the State of California to "take all action necessary to provide the people of this state with ... historic environmental qualities ... and preserve for future generations examples of the major periods of California history."⁴ Under the provisions of CEQA, "A

³ California Code of Regulations (CCR) 14(3) Section 15002(i).

⁴ Public Resources Code (PRC) Section 21001(b), (c).

project with an effect that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment.”⁵ CEQA thus requires that historical resources be taken into consideration during the planning process.⁶ If feasible, adverse effects to the significance of historical resources must be avoided, or the effects mitigated.⁷

CEQA Guidelines section 15064.5(a) defines a “historical resource” as a resource which meets one or more of the following criteria:

- Listed in, or determined eligible for listing in, the California Register by the State Historical Resources Commission;
- Listed in a local register of historical resources (as defined at Public Resources Code (PRC) Section 5020.1(k));
- Identified as significant in a historical resource survey meeting the requirements of PRC Section 5024.1(g); or
- Determined to be a historical resource by a project’s lead agency.⁸

A historical resource consists of: “Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California ... Generally, a resource shall be considered by the lead agency to be “historically significant” if the resource meets the criteria for listing in the California Register of Historical Resources.”⁹

⁵ CCR 14(3) Section 15064.5(b).

⁶ CCR 14(3) Section 15064.5; PRC Section 21083.2.

⁷ CCR 14(3) Section 15064.5(b)(4).

⁸ CCR 14(3) Section 15064.5(a).

⁹ CCR 14(3) Section 15064.5(a)(3).

A “substantial adverse change” is defined by CEQA Guidelines section 15064.5 as “demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired.” The significance of a historical resource is materially impaired when a project demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its inclusion in or eligibility for inclusion in the CRHR, certain local registers, or certain historic resource surveys.

California Public Resources Code: California Register of Historical Resources. The CRHR is established in California Public Resources Code section 5024.1. The CRHR is a guide to cultural resources that must be considered when a government agency undertakes a discretionary action subject to CEQA. The CRHR helps government agencies identify and evaluate California’s historical resources, and indicates which properties are to be protected, to the extent prudent and feasible, from substantial adverse change.¹⁰ Any resource listed in, or eligible for listing in, the CRHR is to be considered during the CEQA process.

A cultural resource is evaluated under four CRHR criteria to determine its historical significance. A resource must be significant in accordance with one or more of the following criteria:

- Criterion 1 (Events): Is associated with events that have made a significant contribution to the broad pattern of California’s history and cultural heritage;
- Criterion 2 (Persons): Is associated with the lives of persons important in our past;
- Criterion 3 (Architecture): Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or

¹⁰ PRC Section 5024.1(a).

- Criterion 4 (Information Potential): Has yielded, or may be likely to yield, information important in prehistory or history.

In addition to meeting one or more of the above criteria, the CRHR requires that sufficient time must have passed to allow a “scholarly perspective on the events or individuals associated with the resource.” Fifty years is used as a general estimate of the time needed to understand the historical importance of a resource.¹¹ In order to protect potential resources, the State of California Office of Historic Preservation recommends documenting, and taking into consideration in the planning process, any cultural resource that is 45 years or older.¹²

The CRHR also requires a resource to possess integrity, which is defined as “the authenticity of a historical resource’s physical identity evidenced by the survival of characteristics that existed during the resource’s period of significance. Integrity is evaluated with regard to the retention of location, design, setting, materials, workmanship, feeling, and association.”¹³ These seven aspects of integrity are defined as:

- *Location*: the place where the resource was constructed;
- *Design*: the combination of elements that create the form, plans, space, structure, and style of the resource;
- *Setting*: the physical environment of the resource, including the landscape and spatial relationship of the buildings;

¹¹ CCR 14(11.5) Section 4852 (d)(2).

¹² California Office of Historic Preservation, *Instructions for Recording Historical Resources*, March 1995, <http://www.ohp.parks.ca.gov/pages/1054/files/manual95.pdf>. The 45-year criterion is in place to account for a projected five-year interval between resource identification and planning decisions. The criterion ensures that resources that will reach the age requirement in the interim are fully considered during the environmental review and decision-making processes.

¹³ California Office of Historic Preservation, *California Register and National Register: A Comparison (for purposes of determining eligibility for the California Register)*, Technical Assistance Series #6, N.D., 2011, <http://ohp.parks.ca.gov/pages/1069/files/technical%20assistance%20bulletin%206%202011%20update.pdf>, accessed August 22, 2017.

- *Materials*: the physical elements that were combined or deposited during a particular period of time and in a particular pattern of configuration to form the resource;
- *Workmanship*: the physical evidence of the crafts of a particular culture or people during any given period of history;
- *Feeling*: the resource's expression of the aesthetic or historic sense of a particular period of time; and
- *Association*: the direct link between an important historic event or person and a resource.

Resources that are significant, meet the age guidelines, and possess integrity will generally be considered eligible for listing in the CRHR. Public Resources Code section 5024.1(g) sets forth guidelines for historical resource surveys, including, among other things, preparation of the survey according to the California Office of Historic Preservation (OHP) procedures and listing the results in the State Historic Resources Inventory. In general, project-specific historical resource surveys performed as part of CEQA review in San Francisco will meet these guidelines and, therefore, resources identified as having California Historical Resource Status Codes 1 through 5 (denoting properties listed in, determined eligible for, or that appear eligible for listing in the CRHR; or properties recognized as historically significant by a local government) on such surveys will normally be determined to be historical resources for CEQA purposes.¹⁴

¹⁴ Status Code 1 denotes properties listed in the National and/or California Register(s); Status Code 2 indicates a property has been determined eligible for listing; Status Codes 3 and 4 indicate a property “appears eligible” for listing; and Status Code 5 denotes a property recognized as historically important by a local government agency.

San Francisco

San Francisco General Plan. The general plan objectives and policies applicable to historic preservation include the following from the Urban Design Element:

- **Objective 2:** Conservation of resources which provide a sense of nature, continuity with the past, and freedom from overcrowding.
- **Policy 2.4:** Preserve notable landmarks and areas of historic, architectural or aesthetic value, and promote the preservation of other buildings and features that provide continuity with past development.
- **Policy 2.5:** Use care in remodeling of older buildings, in order to enhance rather than weaken the original character of such buildings.
- **Policy 2.6:** Respect the character of older development nearby in the design of new buildings.

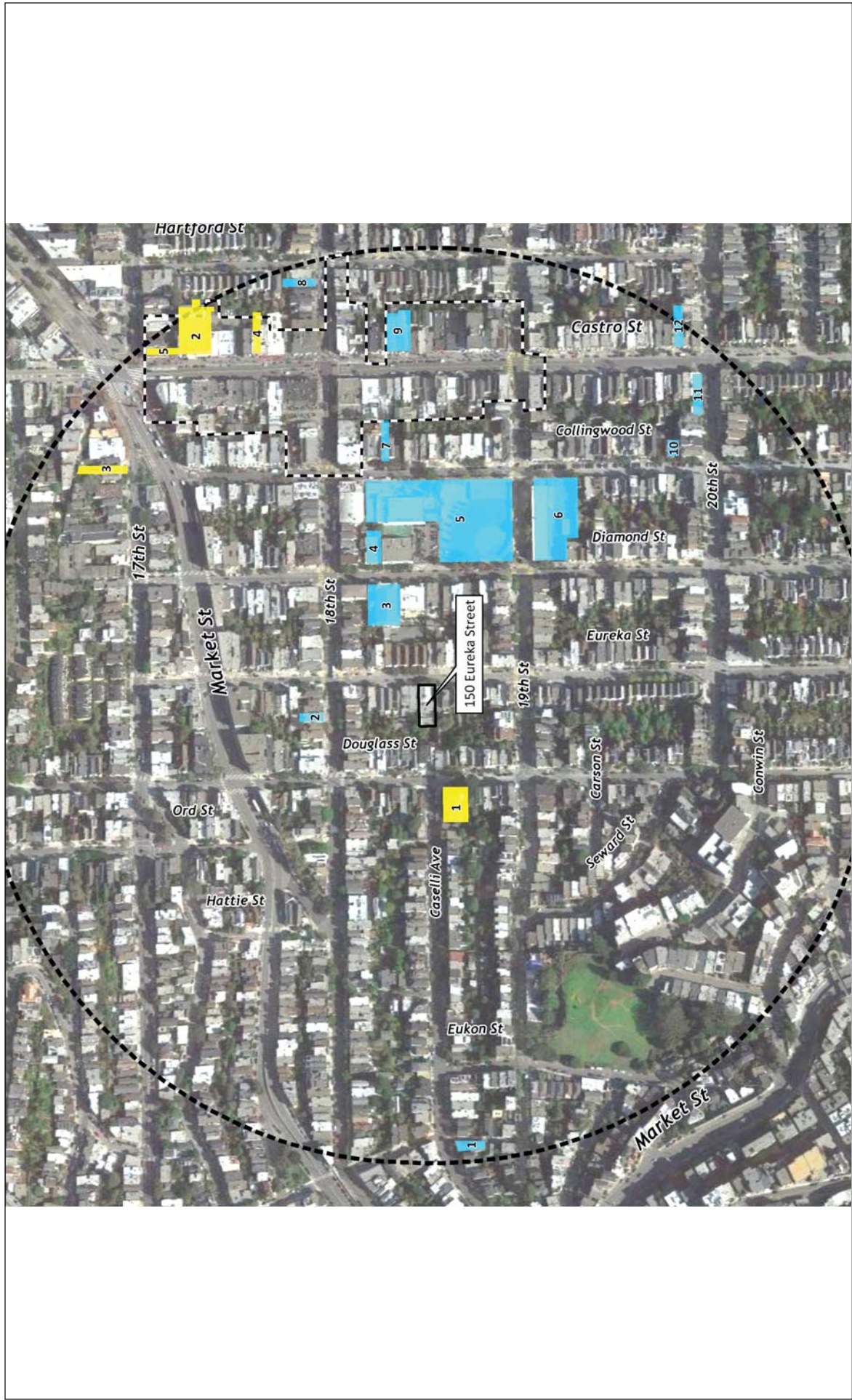
Accountable Planning Initiative. As set forth in Chapter III, Plans and Policies, pp. 33–40, of this draft EIR, the Accountable Planning Initiative (Proposition M of 1986) added eight priority policies to the planning code and to the preamble to the general plan that “shall be the basis upon which inconsistencies in the general plan are resolved” (Planning Code section 101.1). Priority policy 7 is relevant to historical resources and establishes a priority policy “that landmarks and historic buildings be preserved.”

San Francisco City Landmarks (“Article 10 Resources”). San Francisco City Landmarks are buildings, properties, structures, sites, districts, and objects that possess “special character or special historical, architectural or aesthetic interest or value and that are an important part of the city’s historical and architectural heritage.” City landmarks are important to San Francisco’s history and are significant and unique examples of the past. Adopted in 1967 as Article 10 of planning code, city landmarks are protected from inappropriate alterations and demolitions, with all significant alterations reviewed by the historic preservation commission. As of June 2014, there are 266 landmark sites, 11 historic districts, and nine structures of merit in San Francisco subject to Article 10.

There are no Article 10 landmarks or structures of merit on the project site, nor is the project site located within an Article 10 historic district.

Based on information available online at the planning department's San Francisco Property Information Map, there are five Article 10 Historic Landmarks within 0.25 miles of 150 Eureka Street, which are described below and depicted in **Figure IV.A-1**:

1. *Alfred E. (Nobby) Clark Mansion* (2500 Douglass Street; Block/Lot: 2700/001). This Queen Anne residence, built in 1891 was designated City Landmark No. 80 on November 7, 1995.
2. *The Castro Theater* (429 Castro Street; Block/Lot: 3582/085). This Spanish Revival-styled theater, built in 1922, was designated City Landmark No. 100 on July 25, 1977. The Castro Theater is a contributing element to the Castro Street Historic District.
3. *McCormick House* (4040-4042 17th Street; Block /lot: 2623/012). This Queen Anne-styled residence, built in 1902, was designated City Landmark No. 208 on December 23, 1999.
4. *Castro Camera/Harvey Mile Residence* (573-575 Castro Street; Block/Lot: 3582/061). This two-story building with an International-styled ground-floor commercial space and Stick-Eastlake styled second floor residence, built in 1893-94, was designated City Landmark No. 227 on May 22, 2000. Castro Camera and Harvey Milk Residence is a contributing element to the Castro Street Historic District.
5. *Twin Peaks Tavern* (401 Castro Street; Block/Lot: 3582/071). This Mediterranean Revival-styled theater, built in 1923, was designated City Landmark No. 264 on January 29, 2013. The Twin Peaks Tavern is a contributing element to the Castro Street Historic District.



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San Francisco Planning Department Preservation Bulletin 16.¹⁵ The planning department has issued a Preservation Bulletin (No. 16), titled San Francisco Planning Department CEQA Review Procedures for Historic Resources, which integrates the CEQA Guidelines into the city's existing regulatory framework. As a certified local government and CEQA lead agency for the City and County of San Francisco, the planning department has instituted guidelines and a system for CEQA review of historic resources. The planning department has established the categories for use in determining the significance of historic resources, based upon their evaluation and inclusion in specific registers or surveys:

- **Category A: Known Resources.** Category A resources consist of resources that are listed on or formally determined to be eligible for the CRHR and resources listed in adopted local registers, and properties that have been determined to appear or may become eligible, for the CRHR. These properties will be evaluated as historical resources for the purposes of CEQA. Only a change in the property's status as listed in or determined to be eligible for listing in, the CRHR by the California Historic Resources Commission will preclude evaluation of the property as a historical resource under CEQA or the "preponderance of the evidence"¹⁶ demonstrating that the resource is not historically or culturally significant will preclude evaluation of the property as a historical resource.
- **Category B: Properties requiring further consultation and review.** Category B includes properties that do not meet the criteria for listing in Category A, but for which the City has information indicating that further consultation and review will be required to evaluate whether a property is a historical resource for the purposes of CEQA.

¹⁵ San Francisco Planning Department, *San Francisco Preservation Bulletin No. 16: CEQA Review Procedures for Historic Resources*, March 31, 2008, <http://sf-planning.org/sites/default/files/FileCenter/Documents/5340-PresBulletin16CEQA.pdf>, accessed August 29, 2017.

¹⁶ "Preponderance of the evidence" must generally consist of evidence that the appropriate decision-maker has determined that the resource should no longer be included in the adopted survey or register. Substantiated and uncontroverted evidence of an error in professional judgment or a clear mistake, or destruction of the property may also be considered a "preponderance of the evidence that the property is not a historic resource."

- **Category C:** Category C includes properties that have been affirmatively determined not to be historical resources, properties less than 50 years of age, and properties for which the City has no information.

San Francisco Planning Department Historic Resources Survey Program. In November 2015, the San Francisco Historic Preservation Commission adopted the Citywide LGBTQ Historic Context Statement.¹⁷ The Citywide LGBTQ Historic Context Statement provides a broad overview of the complex patterns, events, individuals, and groups that shaped LGBTQ history in the city.¹⁸ It also discusses numerous properties and enclaves citywide for potential associations with the development of San Francisco as a center of LGBTQ activity, which began in the period immediately following the 1906 earthquake and fire.

The Citywide LGBTQ Historic Context Statement identified 9 major sub-themes. These themes are:

- Early Influences on LGBTQ Identities and Communities (19th Century to 1950s);
- Development of LGBTQ Communities in San Francisco (Early 20th Century to 1960s);
- Policing and Harassment of LGBTQ Communities (1933 to 1960s);
- Homophile Movements (1950s-1965);
- Evolution of LGBTQ Enclaves and Development of New Neighborhoods (1960s-1980s);
- Gay Liberation, Pride and Politics (1960s-1990s);
- Building LGBTQ Communities (1960s – 1990s);
- LGBTQ Medicine (1940s to 1970s); and
- San Francisco’s AIDS Epidemic (1981-1990s).

¹⁷ Graves, Donna J. and Shayne E. Watson for the City and County of San Francisco, Planning Department. *Lesbian, Gay, Bisexual, Transgender, Queer (LGBTQ) Historic Context Statement*. Final Document prepared for the City and County of San Francisco through a grant from the Historic Preservation Fund Committee. San Francisco Planning Department, 2016. Note that the HPC adopted the Historic Context Statement in November 2015 with required edits and revisions; the final document is dated March 2016.

¹⁸ The Citywide LGBTQ Historic Context Statement identifies nine themes for assessing significance under Criterion A/1.

These associations are described in the Historical Significance section of this document, as applicable to the 150 Eureka Street building.

Environmental Setting

The building at 150 Eureka Street (Assessor's Block/Lot: 2692/007) is a two-story, institutional/religious building built circa 1909, and altered in approximately 1922 to resemble its present day appearance.^{19,20} The immediate setting of the project site is residential, with single-family attached dwellings that are two- to four-stories in height and range in date from the 1880s to recent construction. The western boundary of the Castro Street Neighborhood District is located two blocks east of the project site and contains dense commercial and multi-family residential uses.

As discussed in more detail later in this section, the building on the project site appears individually eligible for inclusion in the CRHR under Criterion 1 within the context of the Citywide Historic Context Statement for LGBTQ History in San Francisco (Citywide LGBTQ Historic Context Statement),²¹ Therefore, the building on the project site qualifies as a "historical resource" under CEQA. No other cultural resources are located within the project site.

¹⁹ San Francisco Planning Department, *San Francisco Property Information Map – 150 Eureka Street*, <http://propertymap.sfplanning.org>, accessed August 14, 2017.

²⁰ Tim Kelley Consulting, LLC, *Historic Resource Evaluation, 150 Eureka Street, San Francisco*, May 2015, Revised May 2016.

²¹ Graves, Donna J. and Shayne E. Watson for the City and County of San Francisco, Planning Department. *Lesbian, Gay, Bisexual, Transgender, Queer (LGBTQ) Historic Context Statement*. Final Document prepared for the City and County of San Francisco through a grant from the Historic Preservation Fund Committee. San Francisco Planning Department, 2016. Note that the HPC adopted the Historic Context Statement in November 2015 with required edits and revisions; the final document is dated March 2016, http://default.sfplanning.org/Preservation/lgbt_Historic_Context_Statement/FinalLGBTQ_Historic_Context_Statement_March2016.pdf, accessed August 22, 2017.

Neighborhood Context

According to the HRE, the segment of Eureka Street between 18th and 19th streets “contains 31 properties constructed between 1888 and 1969 ranging in height from two- to four stories.” The HRE went on to state that the area contains “a mix of architectural styles. Although the majority of the buildings fall into the Victorian or Edwardian Era of construction, the buildings collectively are not architecturally significant or aesthetically cohesive. The buildings are not historically united.” For these reasons, the HRE concluded that this “area is not a potential historic district.” The HRE also concluded that the building on the project site at 150 Eureka Street is not a contributing element to a historic district.

Below is a description of the historic context of the neighborhood that surrounds the project site.

Eureka Valley/The Castro. Eureka Valley is a section of San Francisco immediately west of the geographic center of the city. It lies at the eastern base of the hills called Twin Peaks, north of Noe Valley, south of Corona Heights and the Western Addition, and west of the Mission District. First settled in the 1870s, it survived the 1906 earthquake and fire relatively intact. The overwhelming majority of the area is of wood-frame construction built prior to 1920. It is located approximately 2 miles from the commercial core of San Francisco, and aside from residential uses, it features commercial strips along Market Street, Castro Street, 18th Street and scattered corner stores.

A major transition period for Eureka Valley began following World War II. Civic infrastructure development began including the valley’s first public park. The pace of residential and commercial growth slowed as the neighborhood developed and open land was built out. During this period, residents began moving west to the Sunset and south to the Daly City suburbs. Urban redevelopment that changed the Mission and Western Addition neighborhoods did not occur in Eureka Valley. However the neighborhood underwent considerable social and cultural transformation during the postwar period.

As the city's manufacturing and retail economies declined after the war and through the 1970s, the demographics and character of many of San Francisco's older neighborhoods changed. By the 1950s, Eureka Valley became a borderland in terms of relative incomes, classes, and racial identities in the city. Residents relocated to newly opened western neighborhoods or to the outlying suburbs for better schools and a quieter life. Relocation was also spurred by "fear of what the neighborhood envisioned spreading over the hill from the Haight-Ashbury district," which is to say, hippies, drug users, and the attendant problems. The first gay bar opening in the late 1960s – the Missouri Mule on Market Street – was an additional factor that compelled longtime residents to consider moving.

Anxiety of being "trapped" in a neighborhood with poor resale value further spurred longtime residents to move out of Eureka Valley. Conversely, this rapid depopulation created opportunities for new residents to take advantage of low rents and available commercial spaces in Eureka Valley. The late-20th century reinvestment of Eureka Valley transformed it into "one of the most significant and widely-recognized concentrations of LGBTQ persons in the nation."

Castro Street Historic District. On June 4, 2013, the planning department prepared an HRER for a project at 470 Castro Street that identified the Eureka Valley/Castro Street Commercial Historic District (Castro Street Historic District, also commonly known as the "Castro") as a potentially eligible CRHR historic district. The historic district boundaries are contiguous with the neighborhood commercial district (NCD) zoning boundaries. Staff found the district significant under Criterion 1/A for its early history as an early streetcar suburb in San Francisco, for the commercial development of Eureka Valley, and also for its cultural association with the LGBTQ movement in San Francisco.

The MCC building at 150 Eureka Street lies outside of the Castro Street Historic District's western boundary, which is generally one-parcel deep from the two-block segment of Castro Street between 17th and 19th streets. In San Francisco, the NCD controls are designed for the surrounding neighborhoods as these NCDs are located within residential districts. These neighborhood commercial districts are primarily supported by and serve the surrounding communities, providing convenience goods for its immediate residential neighborhood. As identified in the Citywide LGBTQ

Historic Context Statement and further research in the HRER, the LGBTQ use associations and business ownership in the Castro Street NCD were notable.

Based on information available at the planning department's online Property Information Map, there are 12 properties within 0.25 miles of 150 Eureka Street that are individually associated with the history of San Francisco's LGBTQ community. These properties do not constitute a known or potential historic district. They are discussed below to provide information about the neighborhood context with respect to the number of individual properties identified in the *Citywide LGTBQ Historic Context Statement* as being associated with San Francisco's LGTBQ community. These properties are identified on **Figure IV.A-1**, p. 59, and the numbers below are keyed to the LGTBQ-associated properties identified on the figure (Article 10 properties identified in **Figure IV.A-1** are discussed previously in this section, pp. 57–58). Other LGBTQ-associated properties within 0.25 miles of that 150 Eureka Street are contributing elements to the Castro Street Historic District (discussed above) and are not included among the properties listed below.

1. **Congregation Sha'ar Zahav** (220 Danvers Street; Block/Lot: 2702/019; Planning Department Historic Resource Status: B – Unknown/Age Eligible). Sha'ar Zahav was founded around 1973 as Chutzpah (later known as Achvah), and was reportedly the first gay Jewish group on the West Coast. In 1977, Congregation Sha'ar Zahav was formed but faced several challenges including finding a regular place to meet. In the early 1980s, Sha'ar Zahav had raised funds to purchase a former Church of Jesus Christ of Latter-Day Saints at 220 Danvers Street (extant). In 1998, Sha'ar Zahav relocated to a former funeral home at 290 Dolores Street (extant) at the corner of 16th Street.
2. **Full Moon Coffee House** (4416 18th Street; Block/Lot: 2650/017; Planning Department Historic Resource Status: B – Unknown/Age Eligible). Full Moon Coffee House opened in 1974 as the first bar that served only women.
3. **Most Holy Redeemer Church** (110 Diamond Street; Block/Lot: 2693/002; Planning Department Historic Resource Status: B – Unknown/Age Eligible). Most Holy Redeemer

Church is associated with the Orange Tuesday protests which took place on June 7, 1977, following the State of Florida's repeal of the Gay Rights Act.

4. **Most Holy Redeemer Church Convent** (115 Diamond Street; Block/Lot: 2694/033; Planning Department Historic Resource Status: B – Unknown/Age Eligible). Most Holy Redeemer Church Convent is credited as housing the first AIDS hospice in the United States.
5. **Eureka Valley Recreation Center** (100 Collingwood Street; Block/Lot: 2694/002; Planning Department Historic Resource Status: B – Unknown/Age Eligible). The Eureka Valley Recreation Center is the location where the Alice B. Toklas Memorial Democratic Club held meetings in the 1970s. In 1996, the field was named in honor of Rikki Streicher for her associations with women's sports and LGBTQ athletics.
6. **Douglass Elementary School** (later renamed *Harvey Milk Civil Rights Academy*) (4235 19th Street; Block/Lot: 2697/001; Planning Department Historic Resource Status: B – Unknown/Age Eligible). Compelled by routine police brutality towards homosexuals, Douglass Elementary is where activists trained themselves to be safety officers and to monitor interactions with law enforcement.
7. **127 Collingwood Street**; Block/Lot: 2695/030; Planning Department Historic Resource Status: B – Unknown/Age Eligible. The building at 127 Collingwood was the location of the Lavender Youth Recreation and Information Center (LYRIC) which provided an organized structure to support "lesbian, gay, bisexual, transgender, queer, and questioning youth, their families, and allies of all races, classes, genders, and abilities." In 1993, LYRIC moved to its current location at 127 Collingwood.
8. **The Castro Country Club** (4058 18th Street; Block/Lot: 3582/052; Planning Department Historic Resource Status: B – Unknown/Age Eligible). According to the Citywide LGBTQ Historic Context Statement, the Castro Country Club was founded in the 1980s to offer a clean and sober gathering place for those with substance abuse problems.
9. **527-541 Castro Street**; Block/Lot: 3582/093; /067; Planning Department Historic Resource Status: B – Unknown/Age Eligible). According to the Citywide LGBTQ Historic Context Statement, this property is where gay employees at the Patio/Baker café at 534 Castro Street

tried to organize themselves and join the Hotel Employees and Retail Employees Local 2. Their efforts were unsuccessful.

10. **279 Collingwood Street**; Block/Lot: 2696/020; Planning Department Historic Resource Status: B – Unknown/Age Eligible. According to the Citywide LGBTQ Historic Context Statement, this property is where Black and White Men Together routinely gathered and was also the home of Michael Smith, the group’s founder.
11. **4200 20th Street**; Block/Lot: 2696/014A; Planning Department Historic Resource Status: B – Unknown/Age Eligible. According to the Citywide LGBTQ Historic Context Statement, this property is where Bay Area Reporter publisher Bob Ross lived and hosted many political events.
12. **685 Castro Street**; Block/Lot: 3602/092; Planning Department Historic Resource Status: B – Unknown/Age Eligible. According to the Citywide LGBTQ Historic Context Statement, this property is where lesbian couple Del Martin and Phyllis Lyon lived in 1953. In 2008, Del and Phyllis were the first lesbian couple legally married in San Francisco.

150 Eureka Street Building

The 150 Eureka Street building covers most of the 6,246-square-foot rectangular parcel with a rectangular, two-story, over-basement wood-frame building clad in stucco on the east or primary, street-facing façade, with rustic, horizontal wood siding on the north-facing façade. The structure is capped with a front-facing gable roof and the rear portion of the building, which contains offices, a chapel, kitchen, cafeteria, and various meeting spaces, is covered with a very low pitched/flat roof. A course of red brick runs along the base of the primary façade. On the left side are red brick steps that lead to the wooden double-leaf main entrance. A large multi-pane Gothic-style window is in the center of the primary street-facing façade, with a metal sign and message cabinet below the window. **Figure IV.A-2** depicts a photo of the existing 150 Eureka Street building façade, as seen from Eureka Street. As shown, open views of the building façade from the roadway are generally obstructed by existing mature street trees.



FIGURE IV.A-2

Building History.²² The 150 Eureka Street building was constructed in circa 1909 for the General Baptist Convention of California. The original architect and builder were not identified by the background research conducted for the HRE. From approximately 1909 to 1914, the building housed the Bethel Baptist congregation. Beginning in 1915 and through 1967, the building was home to the Central Baptist congregation. In 1957, the Central Baptist Church purchased the building from the General Baptist Convention of California and later sold it in 1966 to the American Baptist Churches of Northern California. Two years later, The Voice of Pentecost congregation began holding services at 150 Eureka Street and later purchased the building in 1969. Ten years later, the Metropolitan Community Church (MCC), as the building is known today, purchased the building and held services at this location until its recent sale on February 4, 2015.

The church was remodeled in 1922 according to designs by New York-based architect George E. Merrill. According to the HRE, Mr. Merrill was born in St. Paul, Minnesota in 1870. He was trained in architecture at the Massachusetts Institute of Technology and began his career at the firm of Ernest Flagg in New York City assisting on drafting plans for a rehabilitation of the U.S. Naval Academy at Annapolis, Maryland. After leaving to work in Chicago for a few years, he returned to New York and was elected head of the American Baptist Home Missionary Society. He served as the Society's Consulting Architect on more than 600 building projects. He later operated his own firm in New York and died in 1933. The HRE indicated that George E. Merrill's prolific portfolio does not include any known or important examples in California. The 150 Eureka Street building is the only extant example that is demonstrably associated with Merrill.

²² Unless otherwise cited, this section is adapted from the *Historic Resource Evaluation, 150 Eureka Street, San Francisco*, prepared by Tim Kelley Consulting Group, May 2015, Revised May 2016.

Historical Significance of 150 Eureka Street²³ The HRE and HRER evaluated 150 Eureka Street building under the eligibility criteria for the CRHR and found that the building on the project site at 150 Eureka Street appears individually eligible for inclusion in the CRHR under Criterion 1 within the context of the Citywide LGBTQ Historic Context Statement.

The HRER concluded that the 150 Eureka Street building continues to convey its significance, and retains integrity. The building's location and setting convey historical significance beyond associations with addressing the community in crisis during the AIDS epidemic; its association extended to four themes as identified in the Citywide LGBTQ Historic Context Statement. Staff noted that the building, which was occupied by MCC, is "a community-based religious organization formed by and for the LGBTQ community." In 1979, MCC purchased the building at 150 Eureka Street and became what appears to be the first LGBTQ-oriented congregation in San Francisco to purchase its own building. The MCC secured a church location nestled within this residential district, which reflected a citywide, and national, movement of the LGBTQ community towards what is now the Castro District and surrounding neighborhoods during the 1970s. For these reasons, the HRER determined that the 150 Eureka Street building is individually eligible for listing in the CRHR, and is therefore, a historical resource for the purposes of CEQA.²⁴

The HRER identified six character-defining features of the 150 Eureka Street building. These include:

1. Building massing consisting of a two-story volume with a footprint encompassing two lots;
2. Front-facing gable roof;
3. Fenestration pattern at the main elevation dominated by a large, multi-paned, arched window;

²³ This section is adapted from the San Francisco Planning Department, *Historic Resource Evaluation Response, 150 Eureka Street*, pp. 3–12, August 17, 2016. Additional historic context is provided in the Tim Kelley Consulting, LLC, *Historic Resource Evaluation, 150 Eureka Street, San Francisco*, May 2015, Revised May 2016.

²⁴ San Francisco Planning Department, *Historic Resource Evaluation Response, 150 Eureka Street*, August 17, 2016.

4. Entry Sequence defined by brick stairs leading to a recessed entry;
5. Exterior materials including stucco wall cladding and brick water table; and
6. Interior worship space defined by a double-height volume and small choir loft.

Character defining features of the existing building are depicted in **Figure IV.A-3** through **Figure IV.A-6**, pp. 73–76. Specifically, **Figure IV.A-3** shows a photo of the existing building from approximately 1930, which depicts the overall building massing and front-facing gable roof (character-defining features #1 and #2); **Figure IV.A-4**, p. 74, shows a photo of the building’s multi-paned arched window at the front façade (character-defining feature #3); **Figure IV.A-5**, p. 75, shows a photo of the recessed front entry including the brick stairs and stucco wall cladding (character-defining features #4 and #5); and **Figure IV.A-6**, p. 76, shows the interior worship space including the double-height volume and loft (character-defining feature #6).

The evaluation of the building on the project site at 150 Eureka Street is described below.

Criterion 1: Associated with Events That Have Made a Significant Contribution to the Broad Patterns of California’s History and Cultural Heritage (Events)

To be eligible under CRHR Criterion 1, a property must be associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States. However, mere association is not sufficient to warrant eligibility. A historical resource must have a specific association or associations that are considered significant or important to history. The HRE and HRER concluded that the 150 Eureka Street building is associated with the local social and cultural history of San Francisco, specifically the city’s LGBTQ history, such that it would qualify individually for the CRHR under Criterion 1. A discussion of the MCC’s associations under the four themes identified in the 2015 Citywide LGBTQ Historic Context Statement is presented below.

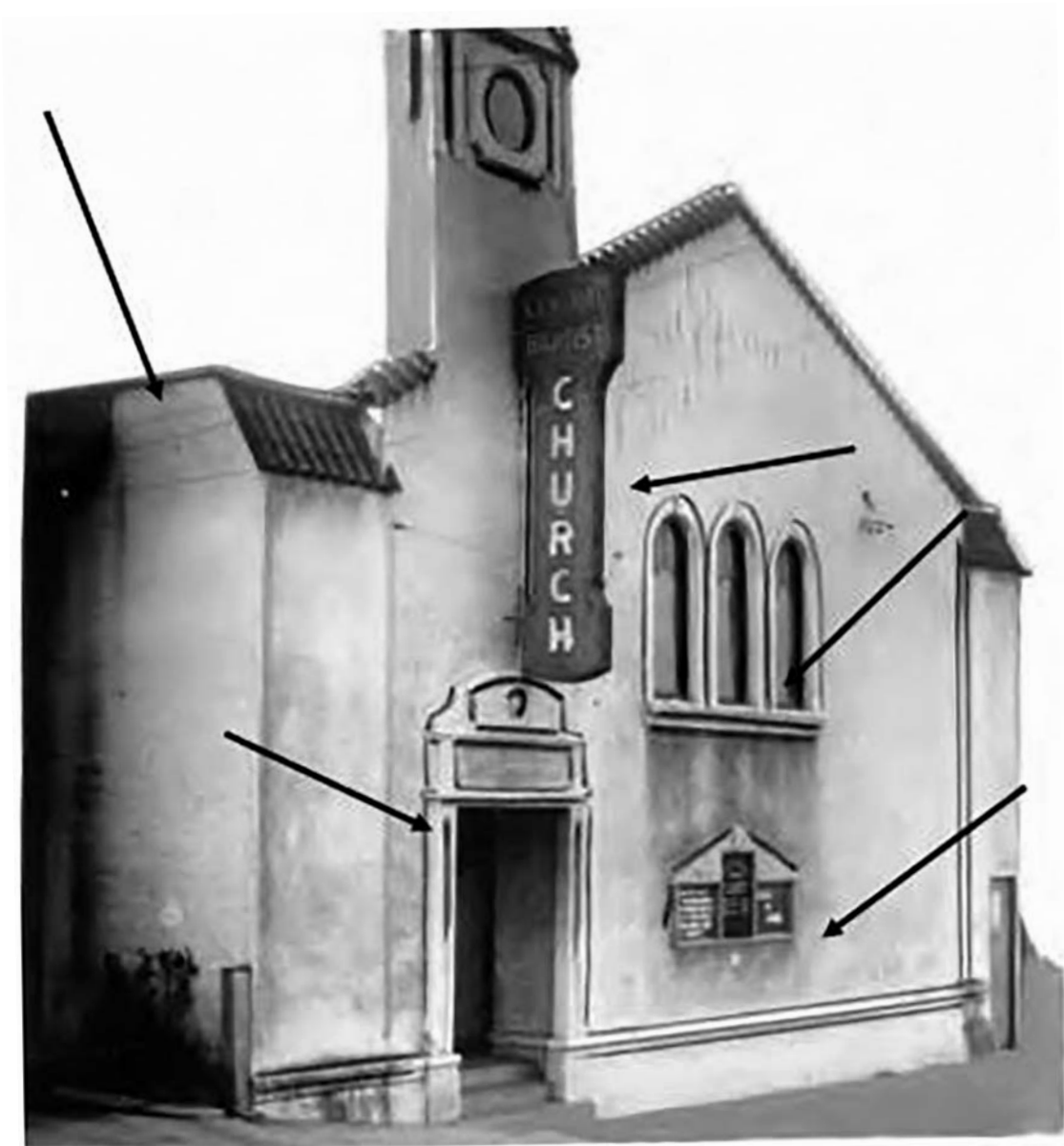


FIGURE IV.A-3

Note: Arrows indicate locations of subsequent alterations.

150 Eureka Street Project EIR
150 Eureka Street Building ca.1930

SOURCE: TIM KELLY HRE (MAY 2015).



FIGURE IV.A-4



FIGURE IV.A-5



FIGURE IV.A-6

Building LGBTQ Communities (1960s – 1990s). Glide Memorial Methodist Church (extant) was instrumental in the founding of the Council on Religion and the Homosexual (CRH) in 1964. In 1972, the first openly gay man was ordained at a site of the Bay Area's Golden Gate Association of the United Church of Christ, a mainstream Protestant denomination in the United States. These two events shaped the LGBTQ religious movement in San Francisco in the early 1970s as religious and spiritual groups for and by the LGBTQ community grew in number and provided safe gathering spaces.

The MCC, a nondenominational Protestant church, was founded in Los Angeles circa 1968. The MCC's San Francisco chapter was founded in 1970, and gathered in rented spaces throughout the city. In early 1973, an arson fire destroyed The Bridge building (150 6th Street, aka 156 6th Street), which contained the MCC Community Center. In July 1973, a three-alarm arson fire gutted the church at 1074 Guerrero Street which the MCC used to hold services. The congregation, estimated to be approximately 500, began meeting at the Mission United Presbyterian Church at Capp and 23rd Streets the Sunday immediately following the arson. During the service, a campaign to raise \$100,000 to rebuild began. MCC historian Lynn Jordan recalled: "City Council Member Dianne Feinstein immediately pledged the first \$100 towards the fund and in the weeks and months that followed, benefits and fundraisers by the drag and leather communities were held and special collections were made at local bars, and telegrams offering financial support came from across the country."

Other community fundraising began to purchase a building which "would not only house the church sanctuary but include a library, offices and meeting rooms to be made available to other homophile organizations." By 1980, MCC purchased the Voice of Pentecost church building at 150 Eureka Street. The first formal worship services at 150 Eureka Street were held in June 1979. According to Jim Mitulski, pastor of MCC of SF from 1985 to 2000, securing the Eureka Street building in the Castro District, may have been "one of the first gay-owned public properties in the City." Other LGBTQ groups, such as the Association of Lesbian and Gay Asians (ALGA),

Dignity and the Gay Buddhist Fellowship gathered at MCC's Eureka Street building for religious and community gathering events.

San Francisco and the AIDS Epidemic (1960s – 1990s). The first AIDS cases in San Francisco occurred in 1981, with eight cases and two deaths. There were 249 cases and 72 deaths by mid-1983 and 550 cases and 213 deaths by mid-1984. There were 3,000 known cases of the disease nationwide by the end of 1983. By July 1985, the total number of cases exceeded 12,000, including more than 6,000 who had already died. By mid-1985, AIDS was the leading killer of single men in San Francisco between the ages of 25-44. The plethora of organizations that grew in response to the AIDS epidemic reflected the emergency and the capacity of various communities, especially LGBTQ individuals, to respond. Because these organizations usually formed as small, grassroots efforts and evolved in response to the crisis, space needs and locations often changed.

San Francisco responded to this epidemic through organizing, and the MCC played an important role during these early years. Community-based organizations in San Francisco included clinics, residential sites, hospices to care for the dying, and the growth of activist networks and civil disobedience that grew out of the widespread discrimination in the early years of the AIDS Crisis. As a community-based organization located in the Castro, MCC began hosting educational presentations and activist gatherings. Important organizations in the early years included Project Inform and ACT UP. San Francisco-based Project Inform, founded in 1985, was a grassroots activist group focused on translating highly technical information for the lay public about prevention, treatments, and testing through their newsletter. The group agitated for aggressive clinical trials for new medicines, established a telephone hotline, and organized town hall meetings held at MCC and other locations. ACT UP, originally founded in 1986 to protest high prices of AIDS-related pharmaceuticals, held its initial meetings at MCC.

These early responses for HIV/AIDS care in San Francisco for its large LGBTQ community “which utilized medical facilities and community-based organizations to mobilize

compassionate and respectful treatment, became a global standard.” In addition, during the early years of the AIDS epidemic, hysteria and discrimination extended outward as a pervasive fear. Discrimination existed for those who had died of AIDS as well, as some funeral homes and churches withheld end-of-life services. In 1988 San Francisco Catholic Archbishop John R. Quinn barred Dignity, a homosexual Catholic group, from meeting on any Archdiocese property. During the peak of HIV/AIDS-related deaths MCC held several memorial services on each weekend day.

Evolution of LGBTQ Enclaves and Development of New Neighborhoods (1960 – 1980s). The Castro neighborhood is identified as one of six LGBTQ-based enclaves in San Francisco. It is noted in the Citywide LGBTQ Historic Context Statement that the Castro was the cultural, economic, and political center for gay San Francisco by the mid-1970s, and this was taken to a new spatial congregation, beyond the earlier developed enclaves such as North Beach or Polk Street. The clustering of nonprofit organizations and commercial establishments such as bookstores, restaurants, florists, barbers, gay newspapers, hardware stores, and clothing shops, solidified the Castro’s identity as a gay residential, cultural and social center. Although the Citywide LGBTQ Historic Context Statement does not define the neighborhood boundaries for the identified enclaves, the eligible commercial historic district along Castro Street has been defined. The MCC building site at 150 Eureka Street is located in a residential neighborhood approximately two blocks west from the central Castro Street corridor whose residents would have patronized this LGBTQ-friendly neighborhood commercial district.

Gay Liberation, Pride and Politics (1960s – 1990s). In 1971, MCC participated in the passage of California Assembly Bill 437, which repealed state sodomy laws which were used to harass and imprison LGBTQ people. MCC organized a march from Oakland’s Lake Merritt to the State Capitol in Sacramento to rally. Other aspects of MCC’s community outreach included “ministry programs focused on gay bars and bathhouses and began a program at Atascadero State Hospital and Prison.” The California Department of Corrections had previously prohibited the Church from holding services. In 1975, a federal court ruling found MCC as a

bona fide religion and was entitled to hold religious services. At Atascadero, men convicted of sex crimes were counseled and ministered to by MCC.

In 1980, MCC organized and coordinated with the United States Department of State in the resettlement of gay Cuban refugees during the Mariel Boatlift. A July 1980 press conference hosted at MCC called upon local sponsors to help settle between 2,000 and 3,000 homosexual Cuban refugees in San Francisco, although the resettlement number may have been closer to 50.

The HRE prepared for the project and further research by planning department preservation staff as part of the HRER have determined that the MCC building at 150 Eureka Street appears individually eligible for CRHR listing under Criterion 1 for significant contributions in the history of the LGBTQ community of San Francisco, a broad pattern of California's history and cultural heritage.

Criterion 2: Associated with the Lives of Persons Important in Our Past (Persons)

To be eligible under CRHR Criterion 2, a property must be associated with the lives of persons in our past. Background research did not indicate that the subject property is associated with the lives of persons important in our past. Therefore, the 150 Eureka Street building does not appear individually eligible for CRHR listing under Criterion 2

Criterion 3: Embodies the Distinctive Characteristics of a Type, Period, or Method of Construction, or Represents the Work of an Important Creative Individual, or Possesses High Artistic Values (Architecture)

To be eligible under CRHR Criterion 3, a property must embody the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values. The building does not embody distinctive characteristics of a type, period, region, or method of construction in a significant manner, nor does it represent the work of an important creative individual or possess high artistic values. Therefore, 150 Eureka Street building does not appear individually eligible for CRHR listing under Criterion 3.

*Criterion 4: Has Yielded, or May be Likely to Yield, Information Important in Prehistory or History
(Information Potential)*

To be eligible for the CRHR under Criterion 4, a property must have yielded or may be likely to yield information important in prehistory or history. Although this criterion is generally understood to apply primarily to archaeological resources, it may apply to architectural resources under limited circumstances where study of the physical fabric of a building may yield important scientific and historic information that is not otherwise available in the documentary record. This criterion does not apply to the 150 Eureka Street building.

The potential for the presence of subsurface archaeological resources within the project site that predate construction of the 150 Eureka Street building is addressed in the NOP/IS (included as Appendix A to this EIR), pp. 37–42.

Integrity of 150 Eureka Street. Although the project site building has undergone a number of alterations since it was originally constructed in circa 1909—a 1922 remodeling and expansion of the original church, installation of replacement windows and doors, change of signage, wall cladding, and loss of some detailed ornament. These alterations have not had an adverse impact on the building's character-defining features. The 2017 HRER found that the building at the project site retains sufficient integrity to convey its significance at the local level for its associations with four of the themes in the Citywide LGBTQ Historic Context Statement: Building LGBTQ Communities, San Francisco's AIDS Epidemic, Evolution of LGBTQ Enclaves and Development of New Neighborhoods, and Gay Liberation, Pride and Politics.

Impacts and Mitigation Measures

This section describes the impact analysis related to historic architectural resources for the proposed project. It describes the significance criteria and methods used to determine the impacts of the project and evaluates the project's impacts on historic architectural resources to conclude whether an impact would be significant. Measures to mitigate (i.e., avoid, minimize, rectify, reduce, eliminate, or compensate for) significant impacts accompany the discussion of each identified significant impact.

Significance Criteria

The thresholds for determining the significance of impacts in this analysis are consistent with the environmental checklist in Appendix G of the state CEQA Guidelines, which has been adopted and modified by the planning department. For the purposes of this analysis, the following applicable threshold was used to determine whether implementation of the proposed project would result in a significant impact to historic architectural resources. Implementation of the proposed project would have a significant effect on a historic architectural resource if it would:

- Cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines section 15064.5, including those resources in Article 10 or Article 11 of the San Francisco Planning Code.

A “substantial adverse change” is defined by CEQA Guidelines section 15064.5 as “physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired.” The significance of a historical resource is “materially impaired,” according to CEQA Guidelines section 15064.5(b)(2), when a project “demolishes or materially alters in an adverse manner those physical characteristics” of the resource that:

- (A) Convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources; or
- (B) Account for its inclusion in a local register of historical resources pursuant to section 5020.1(k) of the Public Resources Code or its identification in a historical resources survey meeting the requirements of section 5024.1(g) of the Public Resources Code, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or
- (C) Convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA.

CEQA Guidelines section 15126.4(b)(2) states that, “In some circumstances, documentation of a historical resource, by way of historic narrative, photographs or architectural drawings, as mitigation for the effects of demolition of the resource will not mitigate the effects to a point where clearly no significant effect on the environment would occur.” In such cases, the demolition or substantial alteration of a historical resource would remain a significant and unavoidable impact on the environment even after the historical documentation has been completed.

Approach to Analysis

This section is based on the HRE and the HRER prepared for the project. As summarized in the Environmental Setting section above, these studies included extensive background research to identify historical resources, field review, resource recordation, and visual analysis by a qualified architectural historian. The 150 Eureka Street building has a current planning department Historic Resource Status Code of “B.” However the HRER conducted for the project has found the building is individually eligible for listing in the CRHR, and is therefore, a “historical resource” for the purposes of CEQA”, as summarized in this section. The building on the project site at 150 Eureka Street appears eligible for listing on the CRHR as an individual resource under Criterion 1 (Events) for its associations with four of the themes in the Citywide LGBTQ Historic Context Statement: Building LGBTQ Communities, San Francisco’s AIDS Epidemic, Evolution of LGBTQ Enclaves and Development of New Neighborhoods, and Gay Liberation, Pride and Politics. Within this context, it is specifically significant for the longevity of its use as a religious institution and community space.

Under CEQA’s two-step analysis of historical resources, the preceding discussion has identified an individual historic resource on the project site. The analysis below focuses on potential impacts to this resource that would result with development of the proposed project.

Approach to Cumulative Analysis

Table IV-1, pp. 46 provides the addresses of cumulative projects within 0.25 miles of the project site and which projects would involve alteration, new construction, and/or intensify land uses in the project site vicinity.

Historic Architectural Resources Impact Evaluation

The 150 Eureka Street building accommodated past uses that are documented in the Citywide LGBTQ Historic Context Statement. The HRE prepared for the project site and the planning department HRER found that the 150 Eureka Street building is individually eligible for inclusion in the CRHR for associations with San Francisco's LGBTQ history. The HRER found that the building retains sufficient integrity to convey its associations with four themes identified in the Citywide LGBTQ Historic Context Statement, which are outlined in the discussion below that analyzes the impacts of the proposed project that are related to historic architectural resources.

Impact CR-1: The demolition of the Metropolitan Community Church Building located at 150 Eureka Street would result in a substantial adverse change to the significance of an individual historical architectural resource as defined by CEQA Guidelines section 15064.5(b). (*significant and unavoidable with mitigation*)

To implement the proposed project, the 150 Eureka Street building would be demolished. As discussed in the Environmental Setting, the building is an individual historical resource under CRHR Criterion 1 (Events) for associations with the LGBTQ history in San Francisco. Specifically, the property is significant for its association with four themes identified in the Citywide LGBTQ Historic Context Statement: Building LGBTQ Communities (1960s-1990s); San Francisco's AIDS Epidemic (1960s-1990s); Evolution of LGBTQ Enclaves and Development of New Neighborhoods (1960s-1980s); and Gay Liberation, Pride and Politics (1960s-1990s). The property is therefore an individual historical architectural resource for the purpose of CEQA, as defined in CEQA Guidelines section 15064.5(b). Demolition of the existing building at 150 Eureka Street would materially impair the significance of the historical resource and, as such, would cause a substantial adverse impact on a historical resource and would be considered a significant impact to a historical architectural resource under CEQA.

Implementation of the following mitigation measures would lessen the impact of the proposed demolition of 150 Eureka Street through documentation and public outreach. This documentation and outreach shall highlight the resource's importance within the historical context of Building LGBTQ Communities, San Francisco's AIDS Epidemic, Evolution of LGBTQ Enclaves and Development of New Neighborhoods, and Gay Liberation, Pride and Politics. However, these mitigation measures would not reduce this impact to a historical architectural resource to a less-than-significant level, and the demolition of the building at 150 Eureka Street would remain significant and unavoidable with mitigation:

Mitigation Measure M-CR-1a: Documentation. Prior to the issuance of demolition or site permits, the project sponsor shall undertake Historic American Building Survey (HABS) documentation of the subject property, structures, objects, materials, and landscaping. The documentation shall be funded by the project sponsor and undertaken by a qualified professional who meets the standards for history, architectural history, or architecture (as appropriate), as set forth by the Secretary of the Interior's *Professional Qualification Standards* (36 CFR, Part 61). The documentation shall consist of the following:

- *Measured Drawings:* A set of measured drawings that depict the existing size, scale, and dimension of the subject property. The planning department preservation staff will accept the original architectural drawings or an as-built set of architectural drawings (plan, section, elevation, etc.). The planning department preservation staff will assist the consultant in determining the appropriate level of measured drawings;
- *HABS-Level Photography:* Digital photographs of the interior and the exterior of subject property. Large format negatives are not required. The scope of the digital photographs shall be reviewed by planning department preservation staff for concurrence, and all digital photography shall be conducted according to the latest National Park Service Standards. The photography shall be undertaken by a qualified professional with demonstrated experience in HABS photography; and

- *HABS Historical Report*: A written historical narrative and report, per HABS Historical Report Guidelines.

The professional shall prepare the documentation and the planning department shall monitor its preparation. The professional shall submit the completed documentation for review and approval by a planning department preservation specialist before issuance of a demolition permit. The documentation shall be disseminated to the planning department, San Francisco Main Library History Room, the Environmental Design Library at the University of California, Berkeley, the GLBT Historical Society's Archives & Research Center, and San Francisco Architectural Heritage.

Mitigation Measure M-CR-1b: Interpretive Program. The project sponsor shall develop an interpretive program to commemorate the LGBTQ use at the 150 Eureka Street building and its significant association with LGBTQ history of the neighborhood and city. Development of this interpretive program shall include outreach to the LGBTQ and Castro communities in order to involve these communities and to create a broader, more authentic interpretive approach for the project site and neighborhood. This outreach process should include identification of the most appropriate theme(s), as identified in the HRER and *Citywide LGBTQ Historic Context Statement*, on which to focus the interpretation program for this site. The interpretive program shall result, at minimum, in the preparation of a publicly-accessible walking tour guide to memorialize the building and its significance within the identified theme(s) associated with the neighborhood. The interpretive program should create a narrative, outline the significance of other buildings identified in the *Citywide LGBTQ Historic Context Statement*, namely their association with the similar theme(s), and develop a plaque or identifying system for properties as part of this walking tour guide.

Interpretation of the site's history shall be supervised by a qualified consultant meeting the Secretary of the Interior's Professional Qualification Standards for Architectural Historian or Historian. The interpretive materials for use in the guide may include, but are not limited to: photographs, news articles, oral histories, memorabilia, and video. Historic information contained in the *Citywide LGBTQ Historic Context Statement* and HRE and HRER for the project may be used for content. A proposal prepared by the qualified consultant, with input from the outreach conducted in the LGBTQ and Castro communities, describing the general parameters of the interpretive program shall be approved by planning department preservation staff prior to issuance of a Site Permit. The detailed content, media and other characteristics of such interpretive program, and/or any alternative approach to interpretation identified by the project team, shall be approved by planning department preservation staff prior to issuance of a Temporary Certificate of Occupancy.

Impact CR-2: The construction of the proposed new building on the project site would not have a substantial adverse effect on any identified or potential off-site historical resources as defined in CEQA Guidelines section 15064.5 in the vicinity of the project site. (*less than significant*)

Adjacent Historic Resources

The project site is not located adjacent to a historic resource and is not within an identified or potential historic district. While, the project site is located two blocks west of the Castro Street Historic District, it is outside of the boundaries of this historic district. In addition, as discussed above, the project site is not located within an Article 10 historic district. Therefore, the proposed project would not affect an adjacent historic resource and this impact would be less than significant.

Vibration

The proposed project would not result in a direct physical impact to off-site historical resources due to construction-related groundborne vibration. As discussed in Section H.5, Noise of the NOP/IS, pp. 66-67, construction of the proposed project would involve demolition, site preparation, and construction activities, but would not involve the use of construction equipment that would result in

substantial groundborne vibration on properties adjacent to the project site. No pile driving, blasting, or substantial levels of excavation or grading activities are proposed.

Since the proposed project would use standard construction equipment and would not include construction activities, such as pile driving, that would result in substantial groundborne vibration, any vibration impacts from the proposed project would be temporary and would not be excessive. Therefore, the potential impact to buildings from groundborne vibration from construction of the proposed project would be less than significant.

For these reasons, the proposed project would not demolish or materially alter in an adverse manner those physical characteristics of adjacent historical resources that convey their historical significance and that justify their eligibility for inclusion in the CRHR (CEQA Guidelines section 15064.5(b)(2)(C)). Implementation of the proposed project would, therefore, have no substantial effect on an off-site historic architectural resource under CEQA. The proposed project's impact on off-site historic architectural resources in the vicinity would thus be less than significant. No mitigation measures are required.

Cumulative Impact Evaluation

Impact C-CR-1: The proposed project, in combination with other past, present and reasonably foreseeable future projects in the project vicinity, would not result in a cumulatively considerable contribution to a significant cumulative impact on a historical architectural resource. (*less than significant*)

The geographic context for an evaluation of cumulative impacts on historic architectural resources is the past, present and reasonably foreseeable cumulative development projects within a radius of 0.25 miles of the project site (see **Table IV-1**, p. 46). These cumulative projects include a number of residential additions and renovations as well as new construction. Of those cumulative projects, only those at 4517 18th Street (Case No. 2016-014999); 160 Caselli Drive (Case No. 2016-010185); 132 Corbett Avenue (Case No. 2014.0016); 4360 19th Street (Case No. 2016-011673); 53 States Street (Case

No. 2014-000018PRJ), and 4072 18th Street (Case No. 2014-003036PRJ) would intensify land uses in the vicinity. In total, these cumulative projects would result in the addition of eight residential units. None of these properties are associated with San Francisco's LGBTQ community.

Construction of cumulative projects that could involve impact equipment (e.g., pile driving, impact hammers/hoes rams, jackhammers) could generate groundborne vibration that could damage adjacent historic architectural resources. However, the closest cumulative project is approximately 1 block away from the project site. As groundborne vibration generated by construction activities attenuates rapidly with distance from the source of vibration, and implementation of the proposed project would not include use of construction equipment that would generate groundborne vibration, the proposed project would not combine with past, present, and reasonably foreseeable projects to result in a significant cumulative vibration-related impact on adjacent historic architectural resources and this impact would be less than significant.

Based on the foregoing, the proposed project in combination with other past, present, and reasonably foreseeable future projects in San Francisco is not expected to have a significant cumulative impact on historical architectural resources associated with the four themes in the Citywide LGBTQ Historic Context Statement: Building LGBTQ Communities, San Francisco's AIDS Epidemic, Evolution of LGBTQ Enclaves and Development of New Neighborhoods, and Gay Liberation, Pride and Politics. The 150 Eureka Street building is an individual resource and is not a contributor to a historic district. Therefore, cumulative impacts on historic architectural resources associated with the proposed project would be less than significant.

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V. OTHER CEQA ISSUES

This chapter discusses the following topics in relation to the proposed project: potential for growth inducement; significant environmental effects that cannot be avoided if the proposed project is implemented; significant irreversible environmental changes that would result if the proposed project is implemented; and areas of controversy and issues to be resolved.

GROWTH INDUCEMENT

This section analyzes the growth-inducement potential of the proposed project, as required by the California Environmental Quality Act (CEQA). CEQA Guidelines section 15126.2(d) requires that an environmental impact report (EIR) evaluate the growth-inducing impacts of a project. A project is considered growth inducing if it would directly or indirectly foster substantial economic or population growth, or the construction of substantial number of additional housing units. Examples of projects likely to result in significant adverse growth inducement include extensions or expansions of infrastructure systems beyond what is needed to serve project-specific demand, and development of new residential subdivisions in areas that are sparsely developed or undeveloped. The project would be located on an infill site, surrounded on all sides by urban uses, and would not result in the extension of infrastructure into undeveloped areas or the construction of a residential project in an area that is undeveloped or lightly developed. Population growth that would result from the proposed project would be limited to the project site itself and the project would not directly or indirectly induce growth beyond the project site.

In addition, as discussed in Section H.2, Population and Housing, p. 33, in the Notice of Preparation/Initial Study (NOP/IS) (see Appendix A), the proposed project would introduce four residential units and increase the residential population of the project site by approximately eight persons. The 2010 U.S. Census indicates that the population in the project vicinity (Census Tract 205) is approximately 2,583 persons. Thus, the proposed project would increase the population near the

project site by approximately 0.3 percent. The population of San Francisco is projected to increase by approximately 280,490 persons for a total of 1,085,725 persons by 2040.¹ The residential population introduced as a result of the proposed project would constitute less than 1 percent of projected city-wide growth. As such, the population increase would be accommodated within the planned growth for San Francisco.

Furthermore, the proposed project would contribute to meeting Association of Bay Area Governments (ABAG) regional housing objectives and would conform with ABAG regional goals to focus growth and development by creating compact communities with a diversity of housing, jobs, activities, and services; and increasing housing supply. Therefore, the proposed project would not directly or indirectly induce substantial population growth in San Francisco.

SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES THAT WOULD RESULT IF THE PROPOSED PROJECT IS IMPLEMENTED

In accordance with sections 15126.2(c) and 15127 of the CEQA Guidelines, an EIR must identify any significant irreversible environmental changes that could result from implementation of the proposed project. Such significant irreversible environmental changes may include current or future uses of non-renewable resources, secondary or growth-inducing impacts that commit future uses of non-renewable resources, and secondary or growth-inducing impacts that commit future generations to similar uses. According to the CEQA Guidelines, irretrievable commitments of resources should be evaluated to assure that such current consumption is justified. In general, such irreversible commitments include the uses of resources such as energy and materials used to construct a proposed project, as well as the energy and natural resources (including water) that would be required to sustain a project and its inhabitants or occupants over the usable life of the project.

¹ Association of Bay Area Governments and Metropolitan Transportation Commission, *Plan Bay Area—Strategy for a Sustainable Region* (p. 40), July 18, 2013. Available online at http://files.mtc.ca.gov/pdf/Plan_Bay_Area_FINAL/Plan_Bay_Area.pdf (accessed February 20, 2017).

The project site is located on a developed city block in San Francisco within the city's Castro/Upper Market neighborhood. The project site is surrounded by existing residential uses. The approximately 6,246-square-foot lot is entirely covered with impervious surfaces comprised entirely of the existing former church building. While the proposed project would result in an increase in the density of development at the project site through the introduction of new residential dwelling units and open space, it would be compatible with the existing uses around the site and within this area of the city.

No significant environmental damage, such as accidental spills or explosion of a hazardous material, is anticipated with implementation of the proposed project. Compliance with federal, state and local regulations would ensure that construction and operation activities at the project site would not result in the release of hazardous materials into the environment and that associated impacts would be less than significant (refer to Section H.15, Hazards and Hazardous Materials, pp. 110-116 of the NOP/IS). As such, no irreversible changes – such as those that might result from construction of a large-scale mining project, a hydroelectric dam project, or other industrial project – would result from development of the proposed project.

Consumption of nonrenewable resources includes increased energy consumption, conversion of agricultural lands, and lost access to mining reserves. As discussed in Section H.17, Agriculture and Forest Resources, pp. 118–119 of the NOP/IS (see Appendix A), the State Department of Conservation designates the site as “Urban and Built-Up Land,” and the site is located in an urbanized area of San Francisco. Therefore, no existing agricultural lands would be converted to non-agricultural uses. In addition, the project site does not contain known mineral resources and does not serve as a mining reserve; thus, development of the proposed project would not result in the loss of access to mining reserves. Refer to Section H.16, Mineral and Energy Resources, pp. 116–118 of the NOP/IS.

Construction of the proposed project would require the use of energy, including energy produced from non-renewable resources. Energy consumption would also occur during the operational period of the proposed project. As discussed in Section H.4, Transportation and Circulation of the NOP/IS, pp. 44-54, the project site is located in an area that is transit-rich and subject to relatively low vehicle

miles traveled compared to the rest of the Bay Area. Thus, implementation of the proposed project would not lead to a wasteful use of fuel. The proposed project would be required to incorporate green building features consistent with the city's Green Building Ordinance that are anticipated to result in additional reductions in GHG emissions. As discussed in Section H.7, Greenhouse Gas Emissions of the NOP/IS, pp. 77-81, the proposed project would not result in any significant impacts associated with an increase in greenhouse gas emissions or conflict with measures adopted for the purpose of reducing such emissions because the project would be compliant with the city's Greenhouse Gas Reduction Strategy. Additionally, the proposed project would not require the construction of major new lines to deliver energy or natural gas as these services are already provided in the area. Therefore, the proposed project would not result in a significant impact associated with the consumption of nonrenewable resources.

SIGNIFICANT AND UNAVOIDABLE ENVIRONMENTAL IMPACTS

In accordance with section 21067 of CEQA and with section 15126(b) and section 15126.2(b) of the CEQA Guidelines, the purpose of this section is to identify significant environmental impacts that could not be eliminated or reduced to less-than-significant levels by implementation of mitigation measures included in the proposed project or identified in Section IV.A, Historic Architectural Resources, pp. 49–90. The findings of significant impacts are subject to final determination by the San Francisco Planning Commission as part of the certification process for this draft EIR.

As identified in Section IV.A, Historic Architectural Resources, pp. 84–87, under **Impact CR-1**, demolition of the 150 Eureka Street building under the proposed project would result in a significant and unavoidable impact on the individual historic architectural resource at 150 Eureka Street, which is identified as a historic resource under CEQA. Implementation of **Mitigation Measures M-CR-1a: Documentation** and **M-CR-1b: Interpretive Program** would reduce this adverse impact on the historical resource, but not to a less-than-significant level. There is no feasible mitigation measure that could avoid this project-related historic architectural resource impact. Therefore, the impact to the historic resource on the project site would remain significant and unavoidable.

AREAS OF KNOWN CONTROVERSY AND ISSUES TO BE RESOLVED

Publication of the NOP/IS initiated a 30-day public review and comment period that began on May 24, 2017, and ended on June 23, 2017. During the review and comment period, a total of 10 letters and emails were submitted to the planning department by interested parties. The comment letters and emails received in response to the NOP/IS are available for review as part of Case File No. 2015-011274ENV. The planning department has considered the comments made by the public in preparation of the Draft EIR for the proposed project. Comments on the NOP/IS checklist that relate to environmental issues are summarized below and are addressed in the NOP/IS or in this EIR, as noted. Comments generally related to several categories and issue topics, and the discussion below is organized into comments that related to: building setbacks, provision of affordable housing, compatibility with surrounding land uses, impacts to visual resources, traffic impacts, impacts to water supply, impacts to historic resources, cumulative impacts, and project alternatives. In addition two of the comment letters received expressed support for the proposed project.

COMMENTS ON THE NOTICE OF PREPARATION

Building Setbacks

One commenter stated that the proposed project does not include a 15-foot setback from the front of the building on the third floor and is in violation of city guidelines. This issue is addressed in Chapter III, Plans and Policies, pp. 33–40, of this draft EIR.

Affordable Housing

Several commenters expressed concern over the proposed project's lack of affordable housing. Commenters noted that the city is in need for additional affordable housing options. The project does not propose, and is not required to, provide affordable housing. This comment is noted and will be considered by city decision-makers.

Compatibility with Surrounding Land Uses

Several commenters questioned the proposed project's consistency with existing surrounding land uses and the existing character of the neighborhood. Commenters noted that development of a four-story building would be inconsistent with the surrounding neighborhood that is characterized by low-rise, single family homes, and two-unit condos. This issue is addressed in Section H.1, Land Use, pp. 30-32, in the NOP/IS.

Visual Impact

Several commenters expressed concern that the proposed project would obscure existing views in the neighborhood. This comment is noted and will be considered by city decision-makers. Impacts to private views are not typically considered impacts to the environment under CEQA. Refer to pp. 27–28 of the NOP/IS, which addresses impacts to visual resources.

Traffic

Several commenters suggested that development of the proposed project would cause traffic impacts along Eureka Street during construction and operation of the building. This issue is addressed in Section H.4, Transportation and Circulation, pp. 44–54, in the NOP/IS.

Water Supply

One commenter expressed concern that the proposed project would result in additional demand for water during a time of drought. This issue is addressed in Section H.10, Utilities and Service Systems, p. 88, in the NOP/IS.

Historic Resources

Commenters identified the historic importance of the existing church building to the LGBTQ community and the building's long history of housing the Metropolitan Community Church, which served as a focal point for the LGBTQ community for over four decades. One commenter also cited the church's history in its role as the Most Holy Redeemer church supporting Irish Catholics who

populated the area before becoming the Metropolitan Community Church. Commenters also questioned the rationale for removing a structure that is eligible for listing on the CRHR. This issue is addressed in Section IV.A, Historic Architectural Resources, pp. 49–90, of this draft EIR.

Cumulative Impact

One commenter expressed concern that demolition of the existing building would allow for more historic structures in the neighborhood to be replaced. The commenter expressed concern that demolition of the building would ultimately affect the historic character of the neighborhood as a whole. This issue is addressed in Section IV.A, Historic Architectural Resources, pp. 49–90, of this draft EIR.

Alternatives

One commenter identified an alternative to the proposed project that would retain the exterior of the building and convert the interior to residential units while retaining a portion of the site as small public space with a museum. Alternatives to the proposed project are considered in Chapter VI, Alternatives, pp. 99–132, of this draft EIR.

Summary

The above issues are addressed and analyzed throughout this draft EIR and the NOP/IS. This draft EIR will be circulated for public review and comment. During this period, written comments concerning the accuracy and adequacy of the EIR will be accepted and a public hearing will be held before the planning commission to receive oral comments. After the close of the public comment period, written responses will be prepared to address substantive comments received on the environmental analysis, and any revisions to the draft EIR will be identified. In addition, the planning commission will consider all comments received in response to the NOP/IS and EIR prior to making a decision on the proposed project.

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VI. ALTERNATIVES

This chapter identifies alternatives to the proposed project and discusses potential environmental impacts associated with each alternative. The CEQA Guidelines require the analysis of a reasonable range of alternatives to the proposed project or to the location of the project, which would feasibly attain most of the basic objectives of the project and avoid or substantially lessen any of the significant effects of the project (CEQA Guidelines section 15126.6). The range of alternatives required in an EIR is governed by a “rule of reason” that requires the EIR to set forth only those alternatives necessary to permit informed public participation and an informed and reasoned choice by the decision-making body (CEQA Guidelines section 15126.6(f)).

CEQA generally defines “feasible” to mean the ability to be accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, technological, and legal factors. The following factors may also be taken into consideration when assessing the feasibility of alternatives: site suitability; economic viability; availability of infrastructure; general plan consistency; other plans or regulatory limitations; jurisdictional boundaries; and the ability of the proponent to attain site control (CEQA Guidelines section 15126.6(f)(1)). An EIR need not consider every conceivable alternative but must consider a reasonable range of alternatives that will foster informed decision-making and public participation. The final determination of feasibility will be made by decision-makers based on substantial evidence in the record, which includes, but is not limited to, information presented in the draft EIR, comments received on the draft EIR, and responses to those comments.

City decision-makers could adopt an alternative instead of approving the proposed project if that alternative would substantially reduce or eliminate significant environmental impacts identified for the proposed project, the alternative is feasible, and the alternative would achieve most of the proposed project’s objectives. The determination of feasibility would be made by city decision-

makers based on substantial evidence in the record, which must include, but would not be limited to, information presented in the draft EIR and the comments received.

CEQA also requires that a No Project Alternative be evaluated (CEQA Guidelines section 15126.6(e)); the analysis of the No Project Alternative is based on the assumption that the project would not be approved. In addition, an environmentally superior alternative must be identified among the alternatives considered. The environmentally superior alternative is generally defined as the alternative that would result in the least adverse environmental impacts to the project sites and affected environment. If the No Project Alternative is found to be the environmentally superior alternative, the EIR must identify an environmentally superior alternative among the other alternatives.

CEQA Guidelines section 15126.6(c) also requires an EIR to identify and briefly discuss any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process. In identifying alternatives, primary consideration was given to alternatives that would reduce significant impacts while still meeting most of the basic project objectives. Those alternatives that would have impacts identical to or more severe than the proposed project, or that would not meet most of the project objectives, may be rejected from further consideration.

As identified in Chapter IV, Environmental Setting, Impacts, and Mitigation Measures, the EIR concluded that, if implemented, the proposed project would result in a significant and unavoidable impact related to an historical architectural resource. Alternatives were selected that would substantially reduce or avoid the significant unavoidable impacts related to historic architectural resources as identified in this draft EIR. Potential alternatives were developed in collaboration with planning department preservation staff, the project sponsor and the Architectural Review Committee

of the Historic Preservation Commission, based on input received at their regular meeting on August 16, 2017,^{1,2} per the Historic Preservation Commission's Resolution No. 0746.³

The focus of the alternatives analysis is on the topic of historic architectural resources. All other environmental issue topics were identified as less than significant or less than significant with mitigation in the NOP/IS. Therefore, this alternatives analysis does not address other issue topics.

SUMMARY OF PROJECT ALTERNATIVES

This chapter compares three alternatives, as summarized below:

- The **No Project Alternative**, under which the project site would not be redeveloped with the proposed project. The existing vacant building would remain in its current condition.
- The **Full Preservation Alternative**, under which the existing building envelope would be maintained with no vertical or horizontal additions. The building interior would be adapted to accommodate a total of four two-bedroom dwelling units for a total building area of 8,338 gsf, and a total building height of approximately 35 feet. No off-street parking would be provided. The rear yard would be 691 gsf.

¹ San Francisco Planning Department, Meeting Notes from the Review and Comment at the August 16, 2017 Hearing for 150 Eureka Street Preservation Alternatives for Draft EIR Case No. 2015-011274ENV, September 7, 2017.

² San Francisco Planning Department, Memorandum to the Architectural Review Committee of the Historic Preservation Commission Regarding Review and Comment for 150 Eureka Street Preservation Alternatives for Draft EIR Case No. 2015-011274ENV, August 9, 2017.

³ City and County of San Francisco, Historic Preservation Commission, March 18, 2015, Resolution No. 0746.

- The **Partial Preservation Alternative**, under which the existing building envelope would be maintained at the ground level with interior modifications as well as vertical and horizontal additions. The building interior would be adapted to accommodate four dwelling units, each with three bedrooms, for a total building area of 16,690 gsf and a total building height of 40 feet. Off-street vehicular parking for four vehicles. The rear yard would be 1,114 gsf.

Table VI-1 compares key elements of the alternatives to the proposed project. **Figures VI-1** through **VI-10b** depict the conceptual site plans and elevations for each development alternative.

Table VI-1: Comparison of Characteristics and Significant Impacts of the Proposed Project with EIR Alternatives


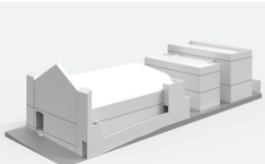
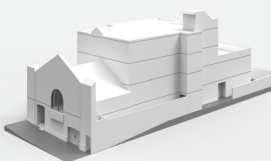
	Proposed Project	No Project Alternative	Full Preservation Alternative	Partial Preservation Alternative
		Assumes No Changes to the Site		
Description				
Building height (feet/inches)	40 ft	29 ft, 6-3/8 inches	29 ft, 6-3/8 inches	40 ft
Number of stories	4	2	4	4
Total number of residential units	4	0	4	4
2 bedroom	0	0	4	0
3 bedroom	2	0	0	4
4 bedroom	2	0	0	0
Gross square foot (gsf) by use				
Residential units	10,119	0	6,923	11,035
Open space private decks	1,081	0	673	1,237
Garage	2,332	0	0	870
Common area	909	0	742	3,548
Total Building Area	14,441	9,350	8,338	16,690
Rear yard at grade (gsf)	2,232	0	691	1,114
Open space (gsf) (125 sf private; 166 sf if common)	3,313 private 0 common	0	673 private 587 common	1,237 private 720 common

Table VI-1: Comparison of Characteristics and Significant Impacts of the Proposed Project with EIR Alternatives


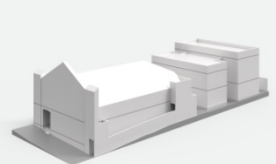
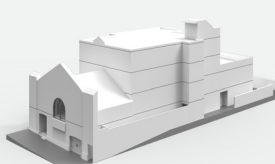
	Proposed Project	No Project Alternative	Full Preservation Alternative	Partial Preservation Alternative
		Assumes No Changes to the Site		
Off-street vehicle parking spaces	8	0	0	4
Bicycle parking spaces (class 1)	4	0	4	4
Lot number/size	6,250 sf lot would be split into two 3,125 sf lots, approximately	N/A	6,250 sf lot to be developed as one lot as currently exists	6,250 sf lot to be developed as one lot as currently exists
Planning entitlements	Building Permit Application In RH-2 Zoning District, with proposed lot split, each lot permitted two dwelling units	N/A	Conditional Use Authorization In RH-2 Zoning District with no lot split (one dwelling unit per 1,500sf lot area) Variance: For change of use in required rear yard	Conditional Use Authorization In RH-2 Zoning District with no lot split (one dwelling unit per 1,500 sf lot area) Variance: For minor encroachment into required rear yard

Table VI-1: Comparison of Characteristics and Significant Impacts of the Proposed Project with EIR Alternatives


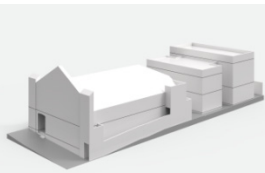
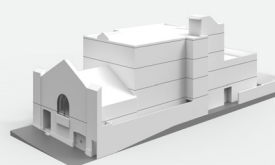

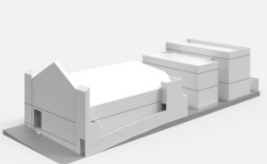
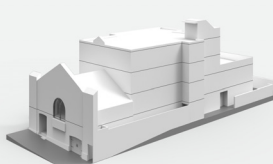
	Proposed Project	No Project Alternative	Full Preservation Alternative	Partial Preservation Alternative
		Assumes No Changes to the Site		
Ability to Meet Project Sponsor's Objectives				
	The project meets all five of the project sponsor objectives.	The No Project Alternative meets none of the five project sponsor objectives.	The Full Preservation Alternative would fully meet Objective #3 and partially meet Objectives #1 and #2 of the proposed project. Objectives #4 and #5 would not be met.	The Partial Preservation Alternative would fully meet Objective #3 and partially meet Objectives #1 and #2 of the proposed project. Objectives #4 and #5 would not be met.
Historic Architectural Resources				
Historic Architectural Resources	<u>Impact CR-1:</u> The demolition of the Metropolitan Community Church Building located at 150 Eureka Street would result in a substantial adverse change to the significance of an individual historical architectural resource as defined by CEQA	N/A	Reduced Impact (LTS)	Reduced Impact but same outcome as the proposed project (SUM)

Table VI-1: Comparison of Characteristics and Significant Impacts of the Proposed Project with EIR Alternatives

	Proposed Project	No Project Alternative	Full Preservation Alternative	Partial Preservation Alternative
		Assumes No Changes to the Site		
	Guidelines section 15064.5(b). (SUM)			
Cumulative – Historic Architectural Resources	<u>Impact C-CR-1</u> : The proposed project, in combination with other past, present and reasonably foreseeable future projects in the project vicinity, would not result in a cumulatively considerable contribution to a significant cumulative impact on a historical architectural resource. (LTS)	N/A	Reduced Impact (LTS)	Reduced Impact (LTS)

SF = square feet

NI = no impact; LTS = less than significant; S = significant; SU = significant unavoidable; SUM = significant and unavoidable impact with mitigation; N/A = not applicable

Source: 150 Eureka Street, LLC, 2017; LSA, 2017.

NO PROJECT ALTERNATIVE

CEQA Guidelines section 15126.6(e) requires that, among the project alternatives, a “no project” alternative be evaluated. CEQA Guidelines section 15126.6(e)(2) requires that the No Project Alternative analysis “discuss the existing conditions...as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and policies and consistent with the available infrastructure and community services.” As noted in CEQA Guidelines section 15126.6, an EIR on “a development project on identifiable property” typically analyzes a no project alternative, i.e., “the circumstance under which the project does not proceed. Such a discussion would compare the environmental effects of the property remaining in its existing state against environmental effects that would occur if the project is approved. If disapproval of the project under consideration would result in predictable actions by others, such as the proposal of some other project, this ‘no project’ consequence should be discussed.”

Description

Under the CEQA-required No Project Alternative, the site would remain in its existing condition and would not be redeveloped with residential uses. The No Project Alternative would retain the existing two-story approximately 29-foot-tall wood-frame church building as-is and the existing building would not be demolished. The building would remain vacant unless a new project is undertaken. The building would continue to be considered structurally unsafe and uninhabitable without substantial foundation repair.^{4 5} Unlike the proposed project, there would be no construction of two four-story buildings, each containing two residential dwelling units for a total of 14,441 gsf. The No Project Alternative would not preclude potential future development of the project site with a range of land uses that are principally permitted for this particular site. However, given the condition of the existing building, this site is not likely to be developed in the near future.

⁴ Santos & Urrutia Structural Engineers, *Soundness Report for Existing Building at 150 Eureka Street, San Francisco, California*, December 22, 2016.

⁵ Reuben, Junius & Rose, LLP, *Summary of Structural Conditions for the 150 Eureka Street Building*, October 19, 2017.

Impacts

Under the No Project Alternative, the existing building at 150 Eureka Street would not be demolished. The building, which has been determined to be eligible for listing on the California Register of Historic Resources, and thus a historic resource under CEQA for purposes of this draft EIR, would be retained. Therefore, compared to the proposed project, which would result in significant unavoidable project-level impacts to historic architectural resources, the No Project Alternative would not result in any impacts related to historic architectural resources. Additionally, compared to the proposed project, under the No Project Alternative impacts related to other environmental topics identified in the NOP/IS would either be less-than-significant or less-than-significant with mitigation.

Ability to Meet Project Objectives

Because the physical environment of the site would be unchanged, the No Project Alternative would not achieve any of the project sponsor's objectives for the project. In particular, objectives regarding the redevelopment of an underutilized site with family-sized residential units; development of a project that achieves high-quality urban design and sustainability standards; and contribution of residential units to city housing goals would not be achieved. Refer to Chapter II, Project Description, pp. 13–32, for a complete list of the project objectives.

FULL PRESERVATION ALTERNATIVE

Description

The Full Preservation Alternative would maintain the existing building envelope, with no vertical or horizontal additions and the building interior would be adapted to accommodate four two-bedroom residential units for a total building area of 8,338 gsf (a reduction of 1,012 gsf of building area compared to existing conditions), and a total building height of approximately 29 feet, 6-3/8 inches. No off-street vehicle parking would be provided. The rear yard would be 691 gsf. **Figure VI-1** depicts the conceptual site plan for the Full Preservation Alternative. **Figure VI-2 and VI-3**, pp. 110–111, depict the conceptual ground and second floor plans for the Full Preservation Alternative.

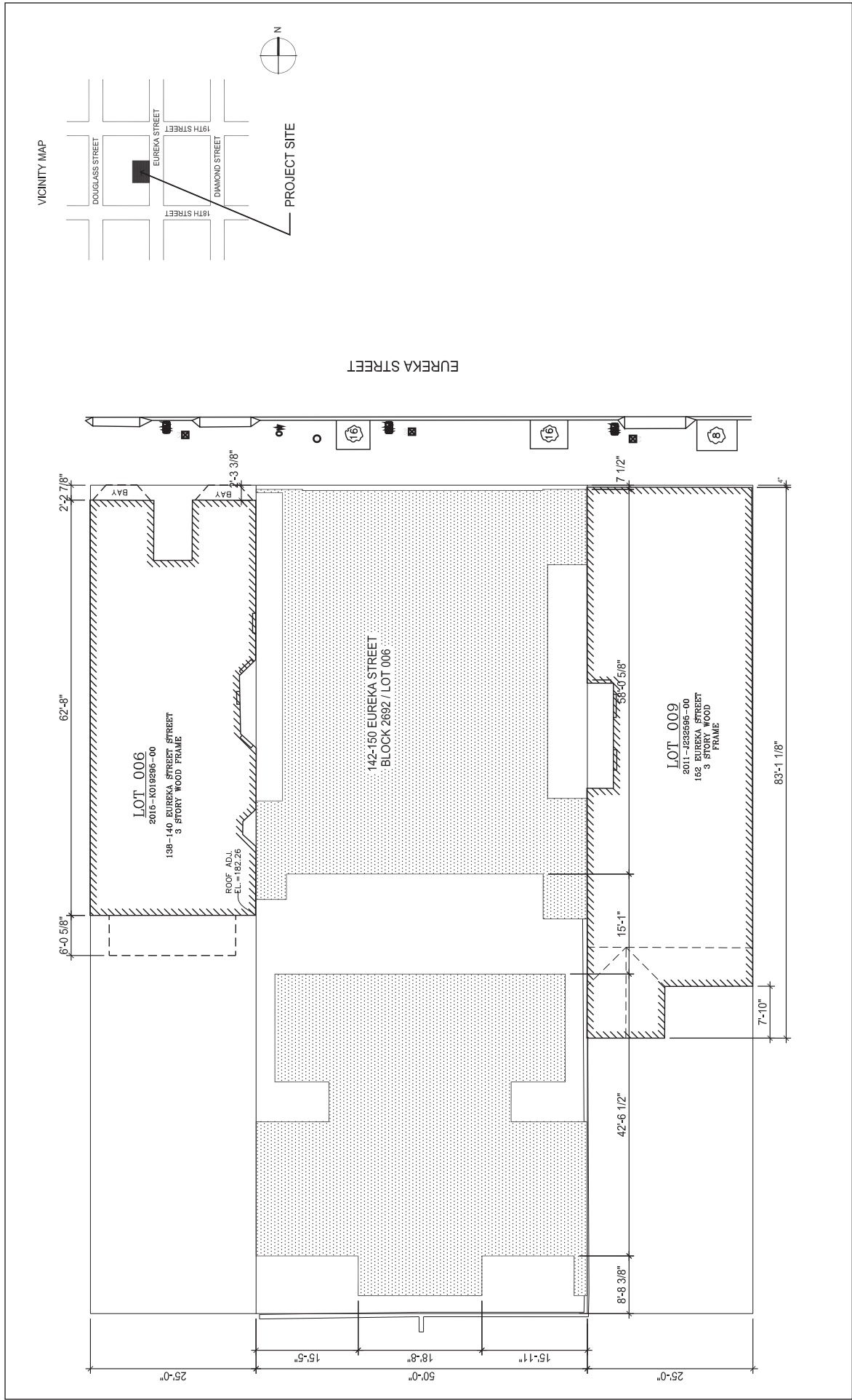
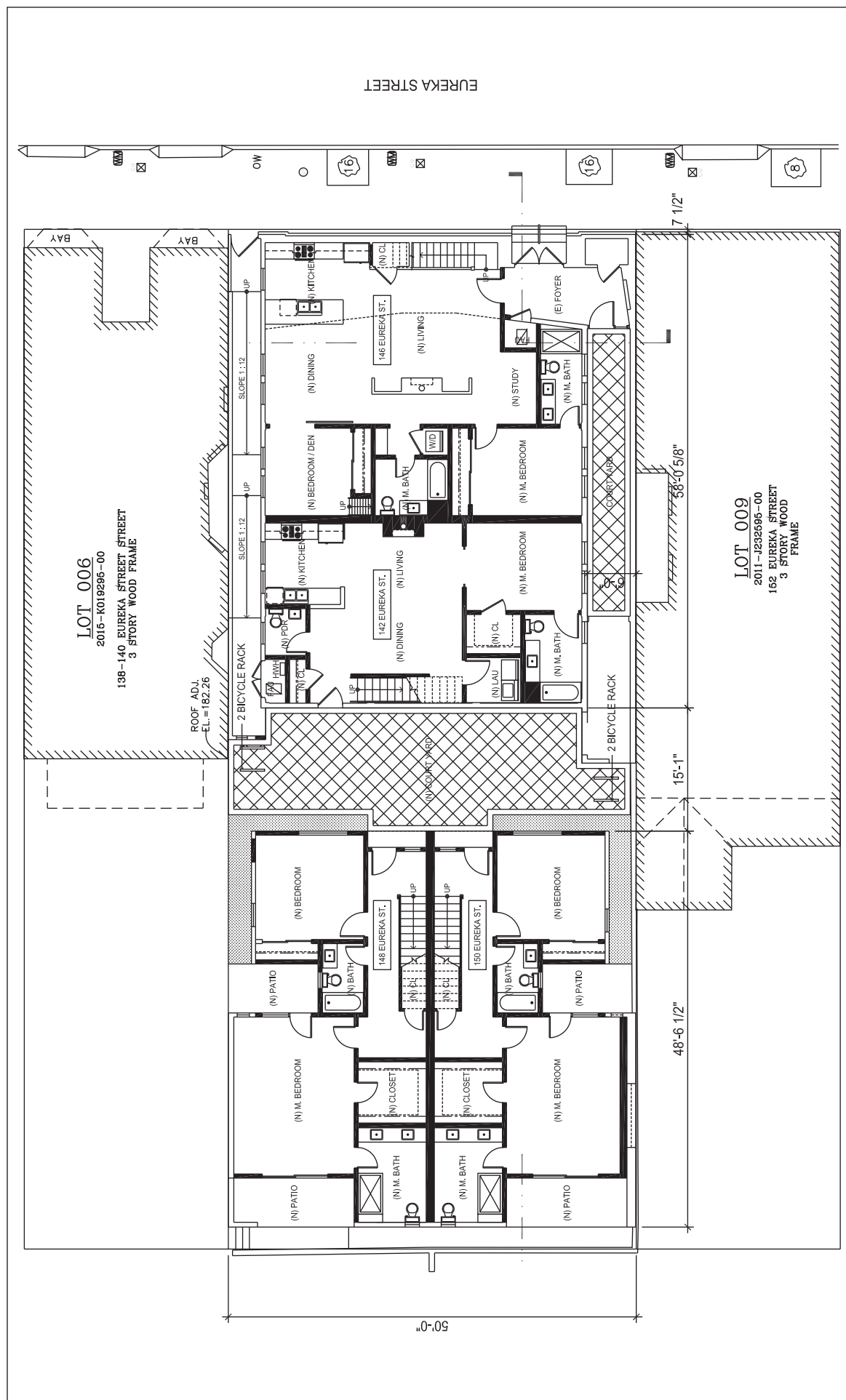
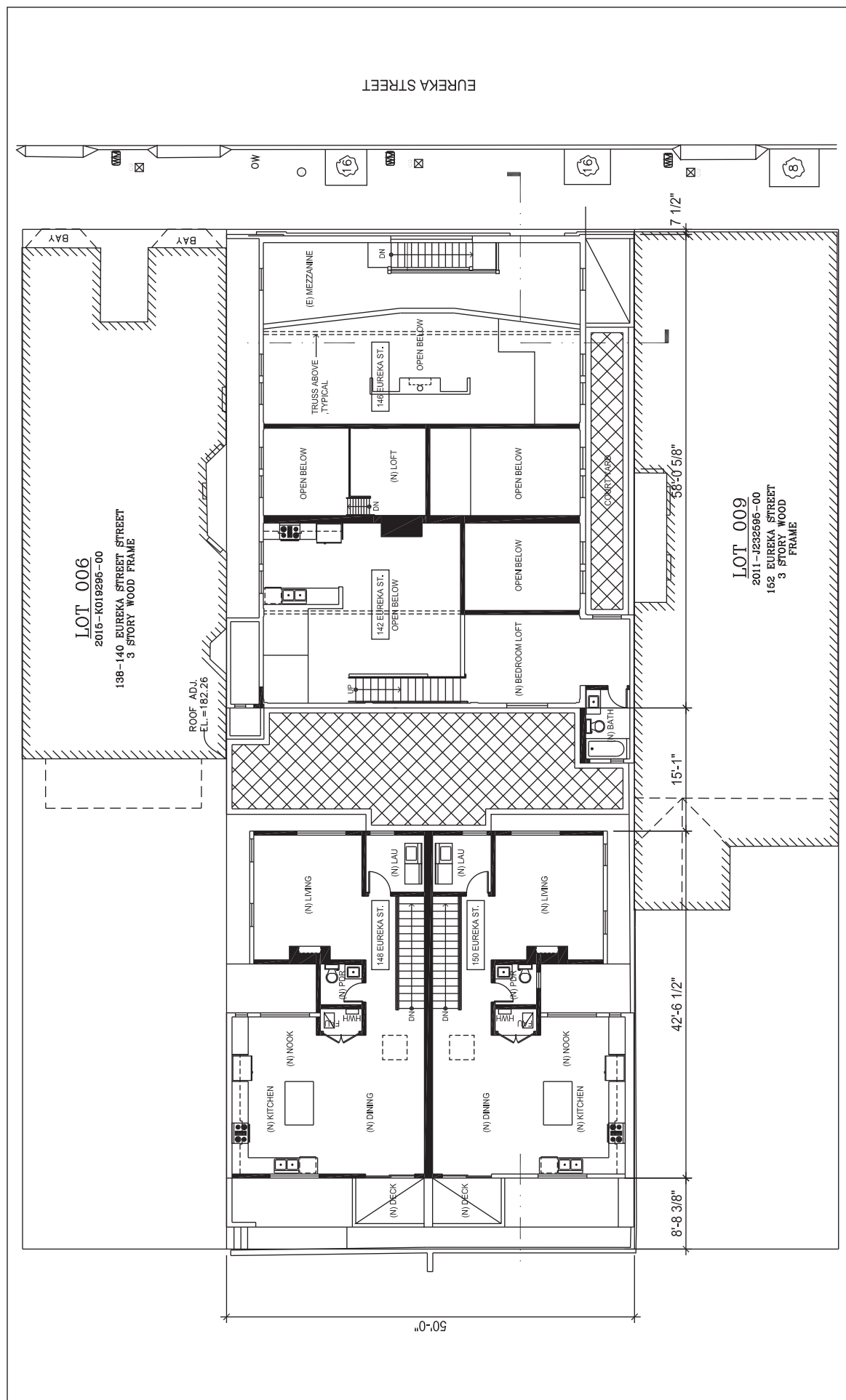


FIGURE VI-1



NOT TO SCALE



NOT TO SCALE

150 Eureka Street Project EIR
Full Preservation Alternative Conceptual Second Floor Plan

In order to provide light and air to the residential bedrooms and private open space to each residential unit, light wells would be cut into the building envelope at the north, south and west property lines.

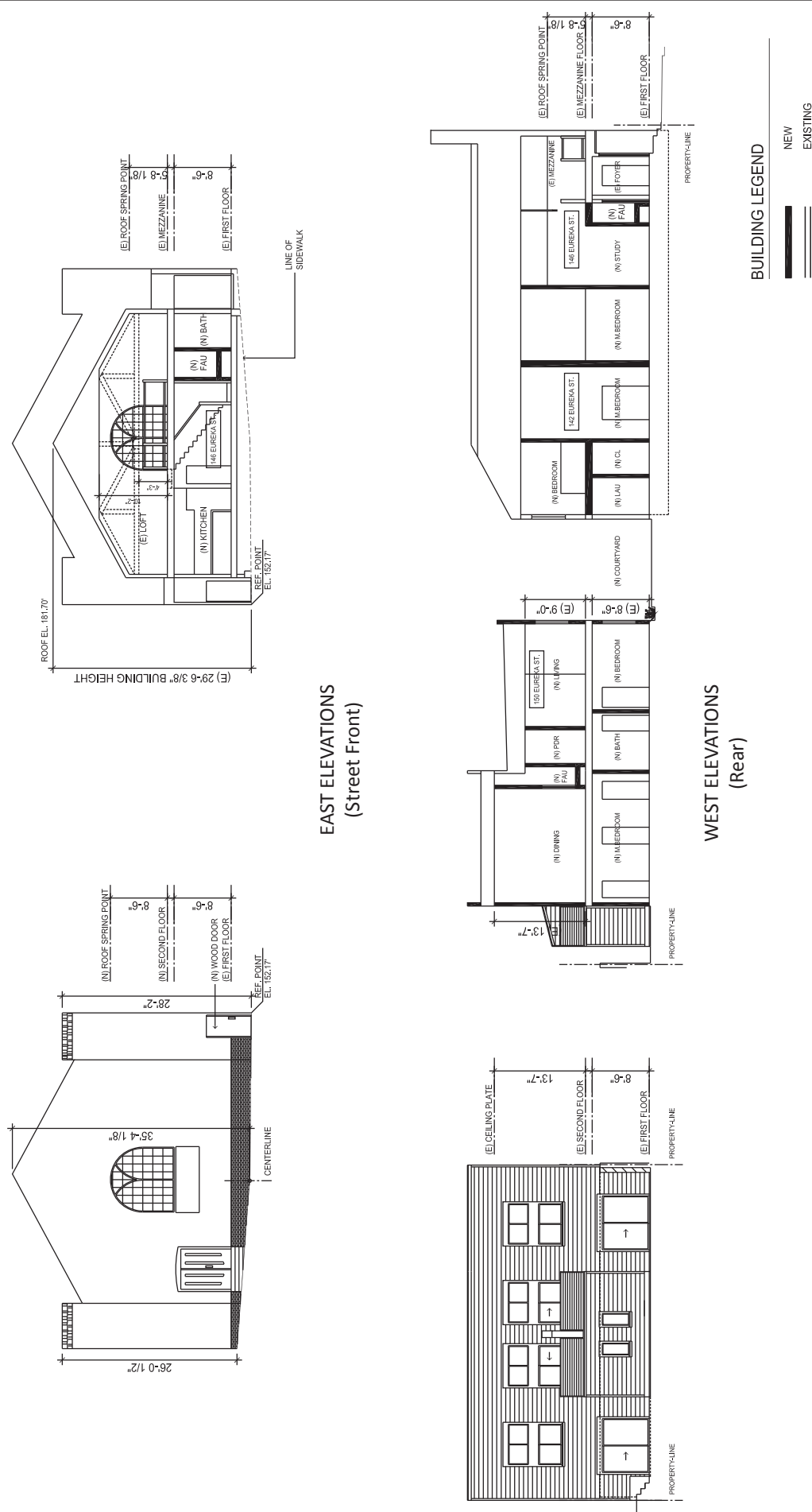
Compared to the proposed project, a larger new courtyard would be created at the center of the building to provide light and air to residential bedrooms and allow fire rescue access to the rear residential units. The existing large worship space within the building, with its exposed two story wooden truss system, would be preserved as part of the interior for two of the residential units.

Figures VI-4a and VI-4b, pp. 113–114, depict the conceptual building elevations for the Full Preservation Alternative.

The following building features would be preserved with the Full Preservation Alternative:

- The original building street façade would be maintained with no new openings or alterations to existing windows and doors.
- The two-story worship space would be partially retained within Units 142 and 146. Both units would have two-story living rooms with the original exposed roof trusses.
- Most of the original building envelope and exterior walls would remain. The original building footprint and exterior building walls would be preserved where possible. In areas where a light court or side patio would be created, the existing exterior walls would be removed to bring light and air to the residential bedrooms.
- The original sloped roof of the worship space and rear flat roof would be retained. There would not be any new roof projections or vertical addition to the existing structure.

The basic existing building envelope, which includes the existing structure, would be maintained with full lot coverage. Compared to the proposed project, the Full Preservation Alternative would not contribute to midblock open space within the existing block; however, the Full Preservation Alternative would also not intensify the existing footprint in order to incorporate the four dwelling units, as they are proposed within the general shape of the existing envelope.



NOT TO SCALE

150 Eureka Street Project EIR
Full Preservation Alternative Conceptual Building Elevations

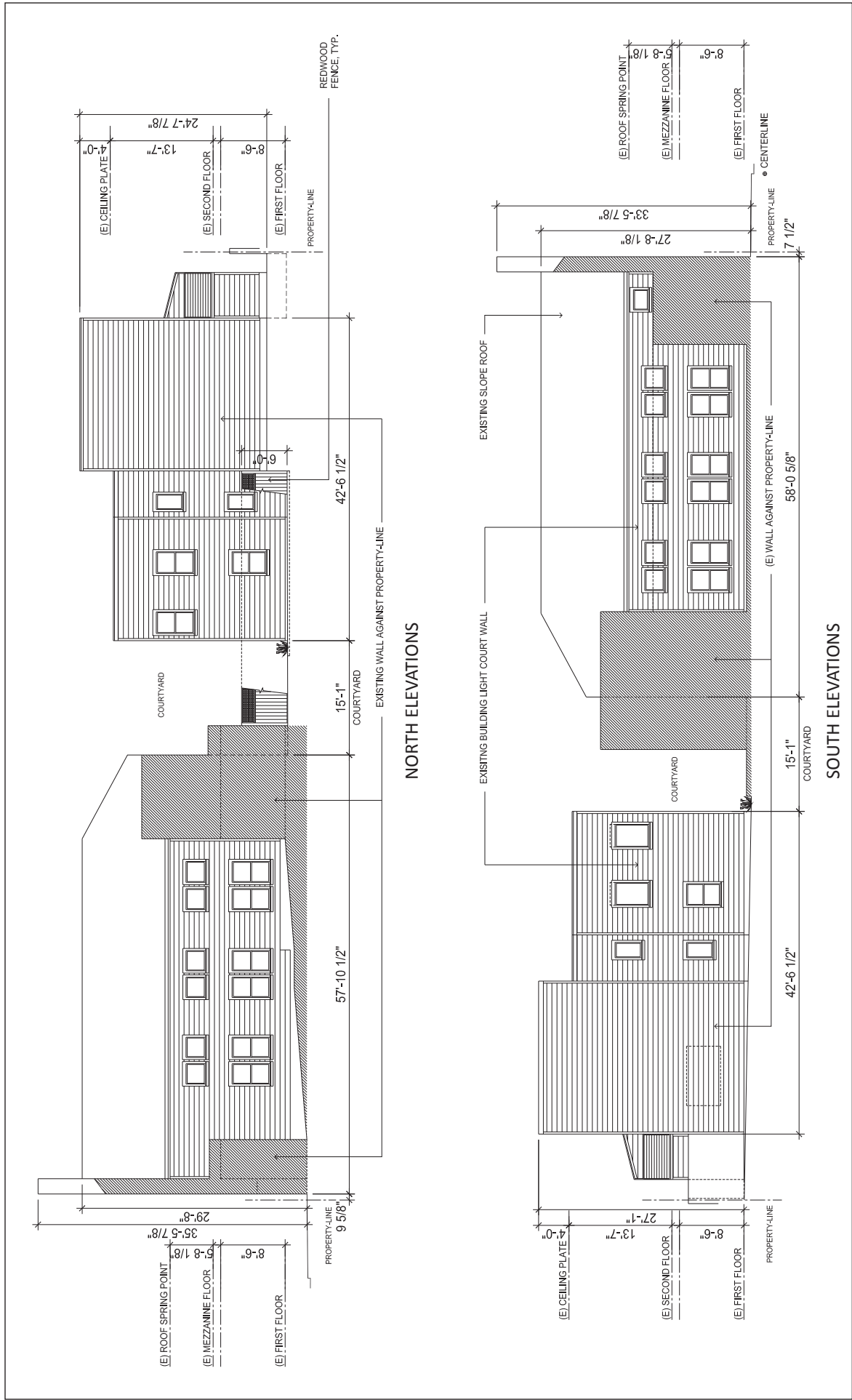


FIGURE VI-4b



Impacts

Unlike the proposed project, the Full Preservation Alternative would retain the entirety of the existing 150 Eureka Street building with no vertical or horizontal additions. While the building alterations would impact integrity of materials, workmanship, and design, the proposed design would retain most of the building's architectural character-defining features and integrity of location, feeling, setting, and to a lesser degree, feeling of association.

The Full Preservation Alternative would not alter the building's main street-facing façade and the aforementioned alterations would not rise above the two-story portion of the existing building. The new four residential units would abut and conceal only the rear, west-facing façade of the existing building, which is not a character-defining feature of the historical resource.

In keeping with the Secretary of the Interior's Standards for Rehabilitation, all character-defining features and materials of the existing building would be retained, with the exception of removing portions of the rear and secondary façades to create light wells. Although providing light wells would require altering portions of the original building and layout, most of the original building would remain including its two-story building massing, two-parcel building footprint, the front-facing gable roof, fenestration pattern primarily consisting of the large, multi-paned, arched window, stucco cladding with brick water table, and main entrance. The alterations proposed as part of the Full Preservation Alternative would not infringe detrimentally on the existing building's significant form, massing, or spatial relationships and would retain the building's double-height interior worship space, all of which are identified in the HRER as character-defining features.

Under the Full Preservation Alternative, the majority of the character-defining features of the former Metropolitan Community Church building at 150 Eureka Street would be retained, with minor modifications along the rear, secondary façades that would not detract from the overall historic integrity of the resource. Therefore, compared to the proposed project, which would result in significant unavoidable project-level impacts to historic architectural resources, the Full Preservation Alternative would not result in a significant impact related to historic architectural resources and no

mitigation measures would be required. In addition, similar to the proposed project, the Full Preservation Alternative would result in either less-than-significant impacts or less-than-significant impacts with mitigation for the other environmental topics discussed in the NOP/IS.

Ability to Meet Project Objectives

The Full Preservation Alternative would meet most of the project objectives, although not to the same extent as the proposed project, as more fully described below.

1. Although the Full Preservation Alternative would re-develop a large underutilized site with high-quality, sustainable, and economically feasible residential dwelling units within the existing density designation for the site and also help to meet the projected City housing needs, this alternative would not meet the sponsor's objectives to the same degree as the proposed project. The overall living space for each unit and the size of bedrooms would be reduced compared to the proposed project (from three- and four-bedroom to two-bedroom units). In addition, the Full Preservation Alternative would not provide off-street parking and would not include a rear yard or midblock open space as proposed by the project.
2. Although the Full Preservation Alternative would result in the retention of the historic architectural resource on the site, the alterations that would be required to accommodate residential uses within the existing building envelope would not result in the development of a project that achieves high-quality urban design and current sustainability standards, is sensitive to and compatible with its residential surroundings, and enhances the existing urban design character of the area to the same degree as the proposed project.
3. The Full Preservation Alternative would result in the construction of residential units on the site to contribute to the City's General Plan Housing Element goals and the Association of Bay Area Governments (ABAG) Regional Housing Needs Allocation for the City and County of San Francisco and would meet this project objective.

4. The Full Preservation Alternative would not provide a new midblock open space to enhance the quality of life for the project's residents and neighbors.
5. Compared to the proposed project, the Full Preservation Alternative would not result in the construction of a high-quality project that will produce a reasonable return on investment for the project sponsor and its investors and attract investment capital and construction financing due to the structural deficiencies in the existing building.⁶

PARTIAL PRESERVATION ALTERNATIVE

Description

The Partial Preservation Alternative would maintain the general building envelope at the ground level with interior modifications as well as vertical and horizontal additions. The building interior would be adapted to accommodate four dwelling units, each with three-bedrooms, for a total building area of 16,690 gsf and a total building height of 40 feet. Off-street vehicular parking for four vehicles would be incorporated at the ground level, through creation of a new curb cut and garage access at the front elevation. The rear yard would be 1,114 gsf. **Figure VI-5** depicts the site plan for the Partial Preservation Alternative. **Figure VI-6 through VI-9**, pp. 119–122, depict the conceptual ground through fourth floor plans for the Partial Preservation Alternative.

⁶ Santos & Urrutia Structural Engineers, *Soundness Report for Existing Building at 150 Eureka Street, San Francisco, California*, December 22, 2016.

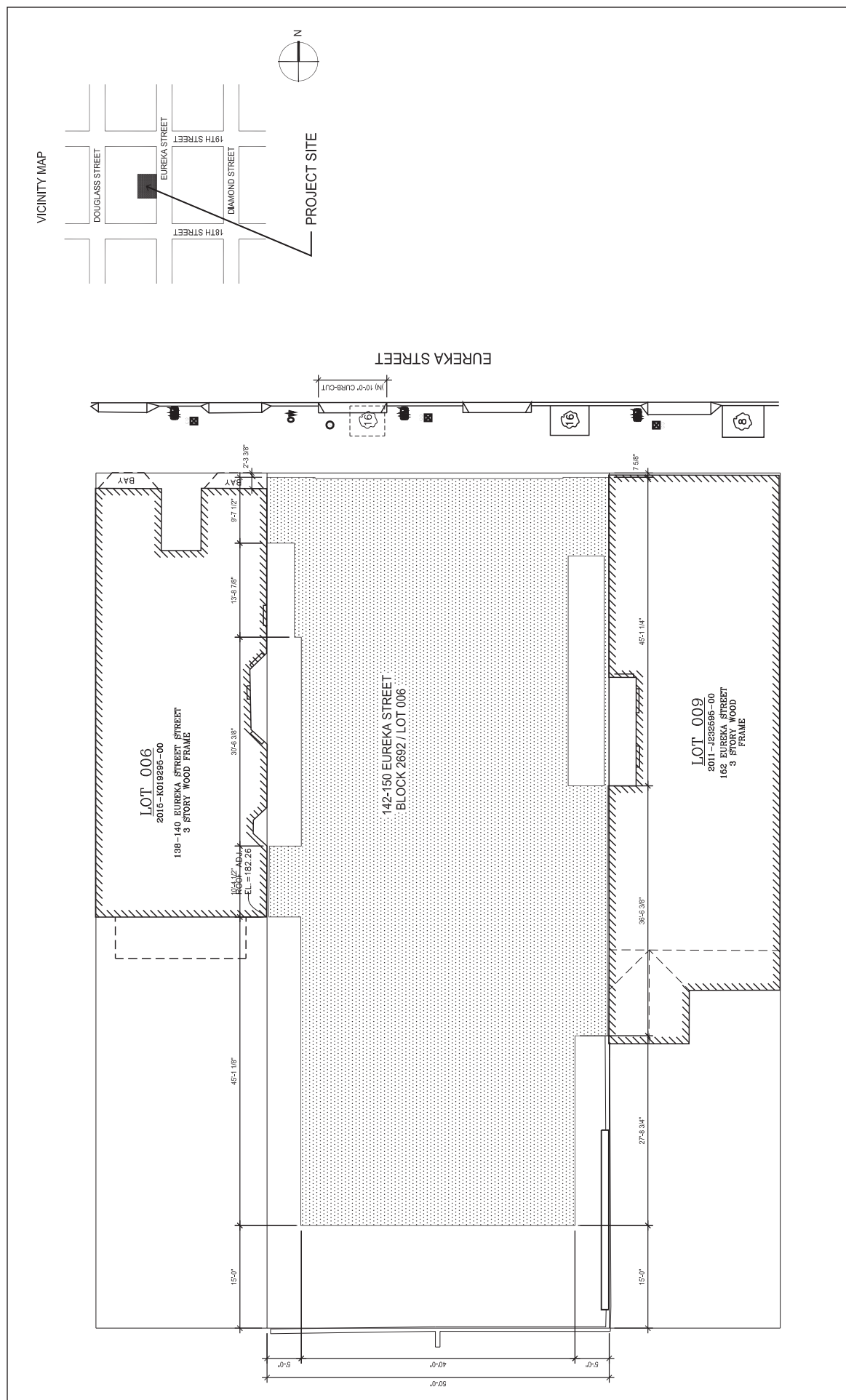


FIGURE VI-5

NOT TO SCALE

150 Eureka Street Project EIR
Partial Preservation Alternative Conceptual Site Plan

SOURCE: GARY GEE, AIA, 2017.

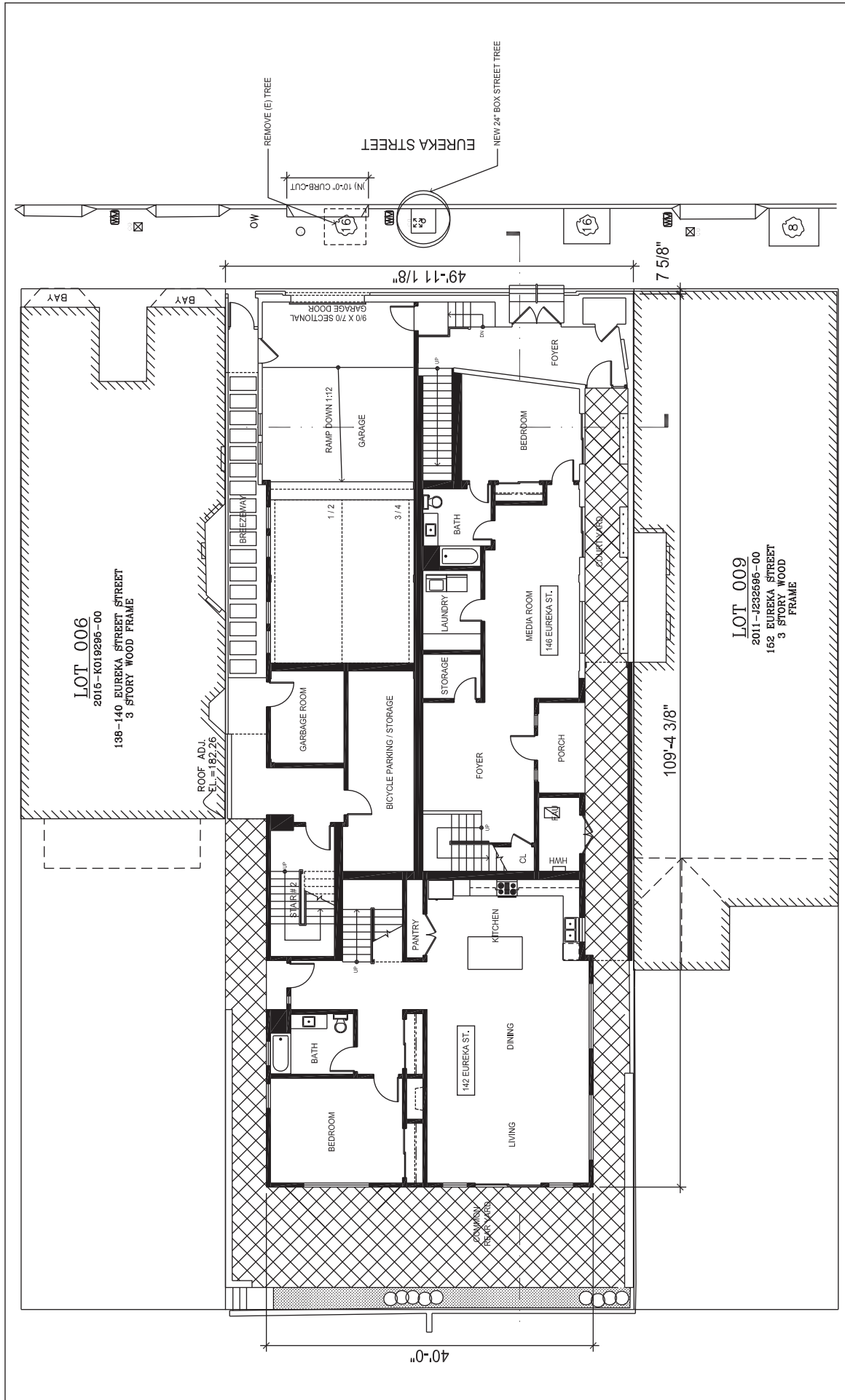


FIGURE VI-6





FIGURE VI-7

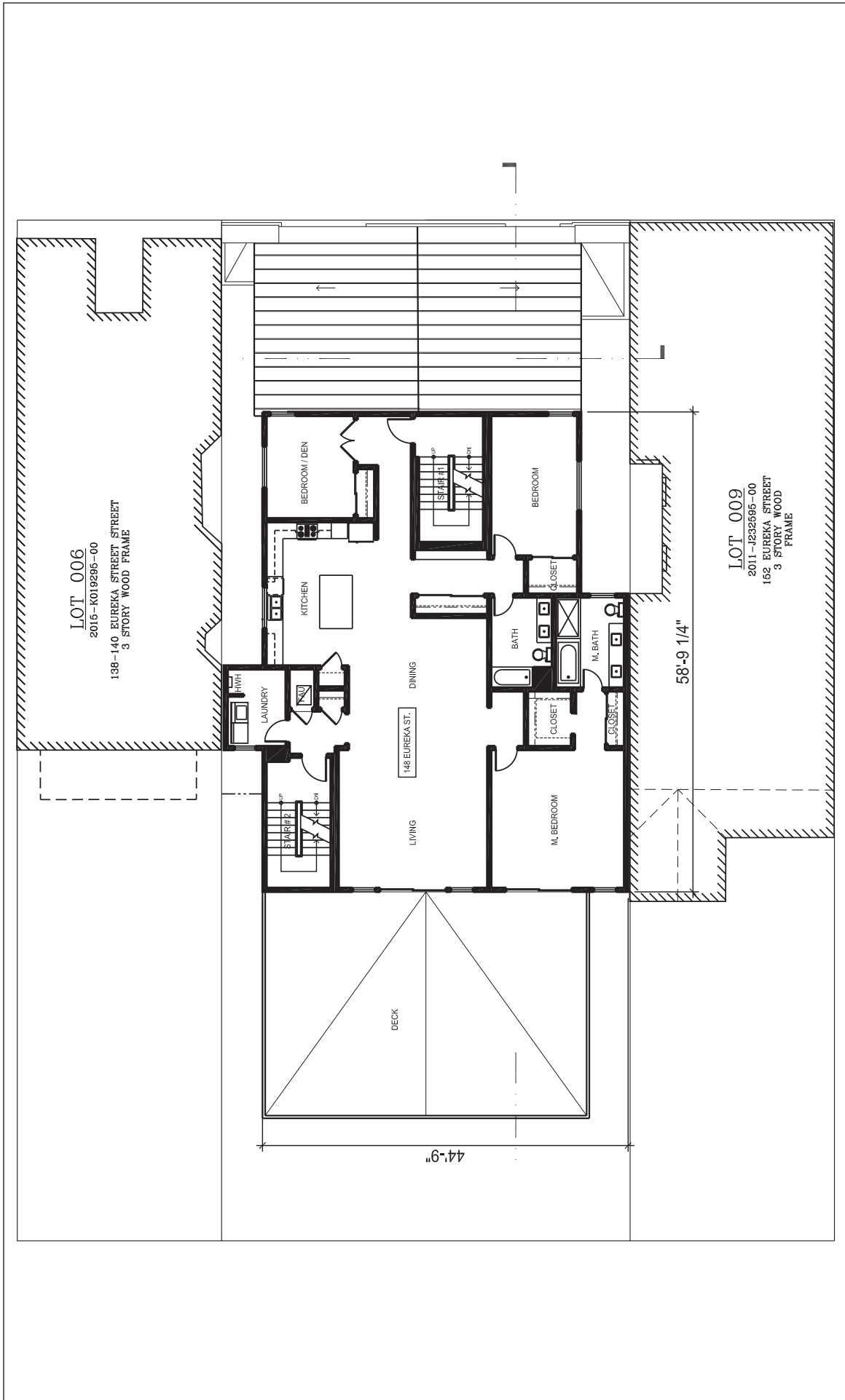


FIGURE VI-8



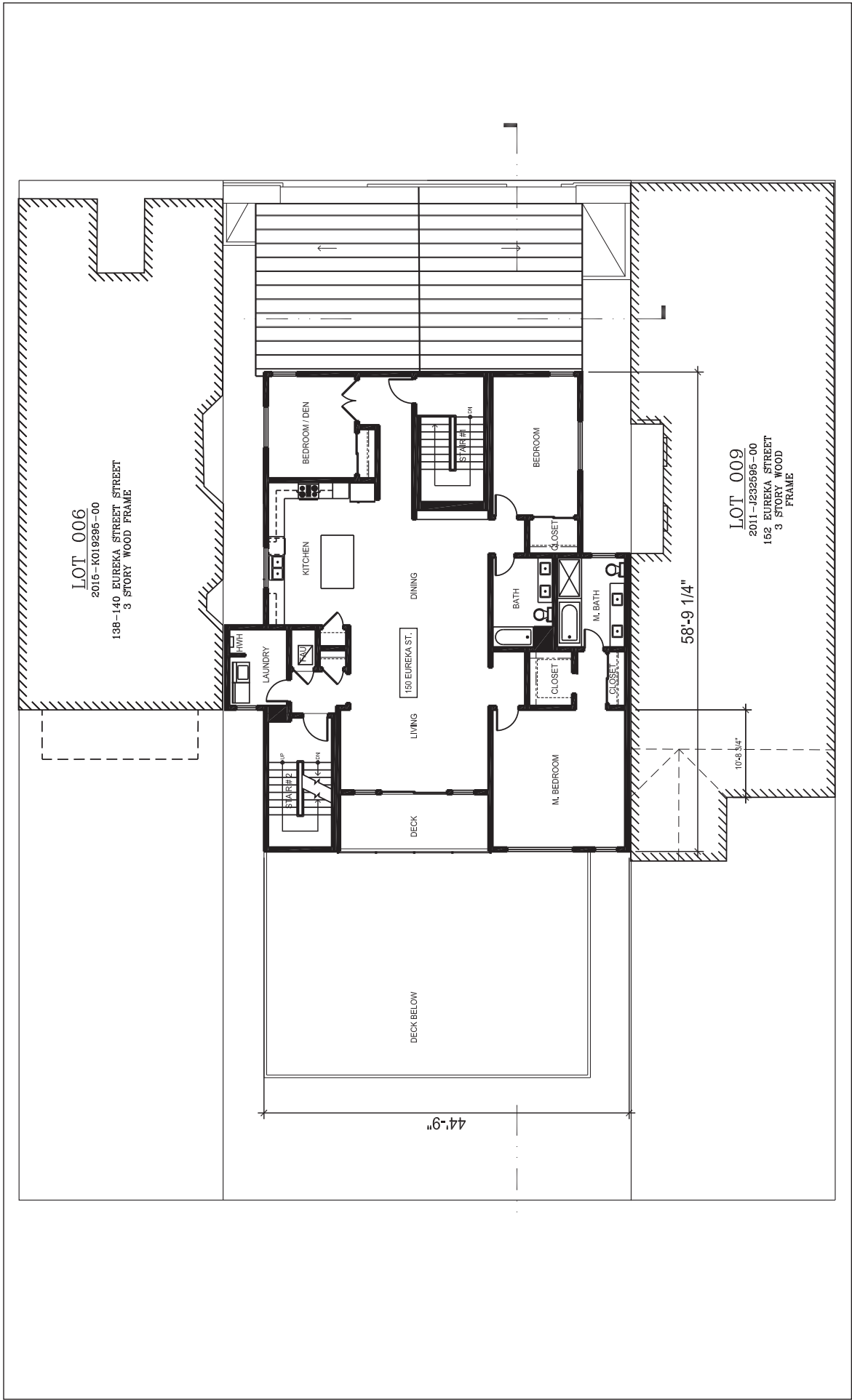


FIGURE VI-9

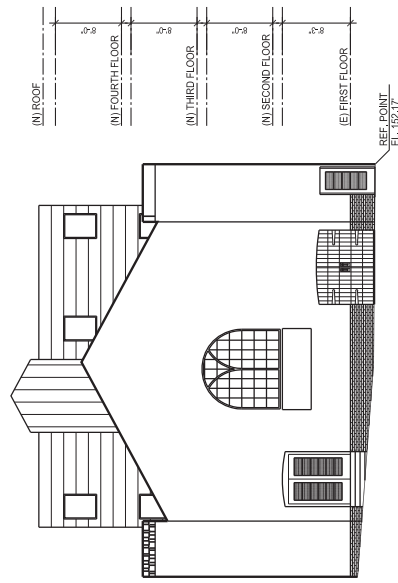


At the front of the building, the Partial Preservation Alternative would preserve the front 23 feet of the existing building, which includes the existing mezzanine and part of the existing two-story main worship space. This Alternative would install an approximately 9-foot by 7-foot-wide wooden sectional garage door at the far right side of the main, street facing façade, requiring removal of a portion of the stucco cladding and brick water table at this location as well as a new, 10-foot-wide curb cut. A two-story vertical addition would be introduced approximately 23 feet from the front plane of the building. The overall building height at the third and fourth level vertical addition would create a 40-foot-high building towards the center of the building mass. The two story addition would be 44 feet, 9 inches wide by 58 feet in length and would be located over the existing roof. This addition would include two of the four residential units. The other two residential units would be located in the existing rear portion of the building.

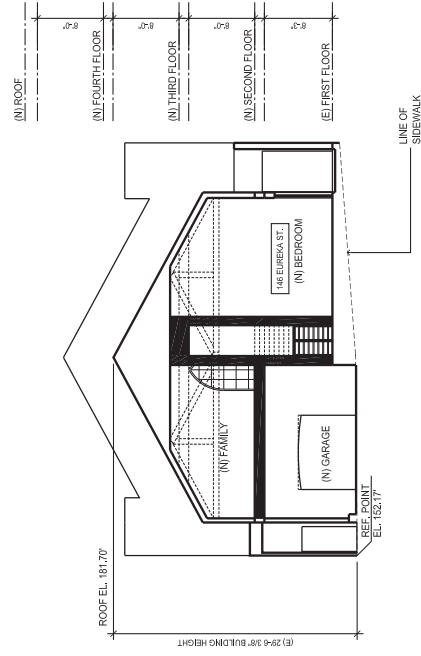
At the ground level, the rear building line would be 15 feet from the west (rear) property line. This area at grade would serve as a private rear yard to one of the two-story residential units. The overall building massing would step back from the rear property line with a 15-foot setback at grade for the ground and second level and a 29-foot, 8-inch setback at the third and fourth floors. **Figures VI-10a and VI-10b**, pp. 124–125, depict the conceptual building elevations for the Partial Preservation Alternative.

Impacts

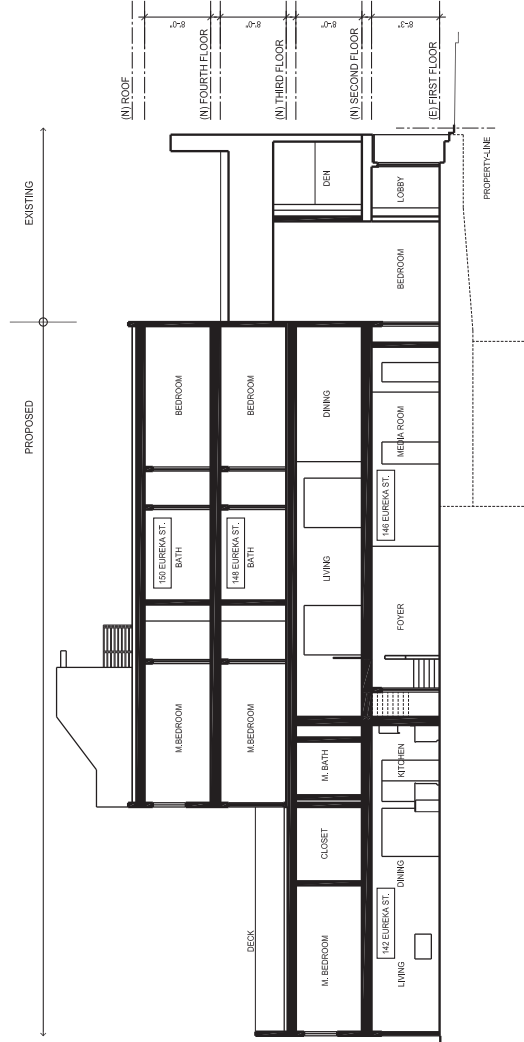
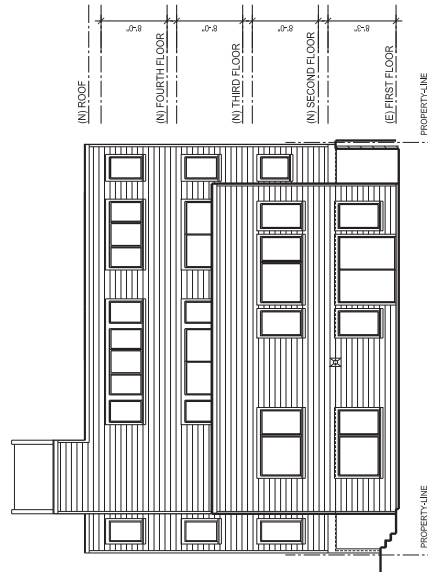
Under the Partial Preservation Alternative, the majority of the general building envelope of the historic building would be preserved, with interior modifications and new vertical and horizontal additions along the non-character-defining secondary, north, west, and south-facing-façade partially removed to accommodate four new residential units.



EXISTING / PROPOSED EAST STREET FRONT ELEVATION



EXISTING / PROPOSED WEST REAR ELEVATION



BUILDING LEGEND

NEW
EXISTING

NOT TO SCALE

N

FIGURE VI-10a



EXISTING / PROPOSED SOUTH ELEVATION

This alternative would retain most the historic building's two-story massing, and many of the existing elements of its main, street-facing façade, materials, entrance and fenestration primarily consisting of the large, multi-paned, arched window. An exception is the proposed installation of a 9-foot by 7-foot-wide wooden sectional garage door at the far right corner. A stepped-back transition towards the rear of the building would clearly differentiate the new construction from the original building. This alternative would retain the front-facing gable roof, fenestration pattern primarily consisting of the large, multi-paned, arched window, stucco wall cladding with brick water table, the entry sequence defined by brick stairs leading to a recessed entry, and most of the brick water table, which have been identified as character-defining features in the 2016 HREER. Setbacks from the east-facing façade of the building would also lend to the differentiation between the existing building and new construction that would rise above.

In keeping with the Secretary of the Interior's Standards for Rehabilitation, many character-defining features and materials of the existing building would be retained under this alternative including the parcel configuration, the front-facing gable roof, fenestration pattern primarily consisting of the large, multi-paned, arched window, stucco cladding with brick water table, and main entrance. The proposed two-story addition would be setback 23 feet from the main façade plane and not encroach or infringe detrimentally on the existing building's significant form, massing, or spatial relationships. Moreover, this alternative would retain a portion of the building's double-height interior worship space, all of which are identified in the HREER as character-defining features. However, less of the double-height interior space would be retained than proposed under the Full Preservation Alternative as a portion of the building would be reconfigured to accommodate off-street parking for four vehicles. The installation of an approximately 9-foot by 7-foot-wide wooden sectional garage door at the far right side of the main, street facing façade, would require removing a portion of the stucco cladding and brick water table at this location as well as a new, 10-foot-wide curb cut. However, these alterations to the main, street-facing façade would occur in one location, would not require removal of or displace the original fenestration primarily consisting of the large, multi-paned, arched window, main entrance, or historical wall cladding at any other locations, and therefore would not result in a material adverse change to the historical significance of the 150 Eureka Street building.

The Partial Preservation Alternative would not avoid, but would substantially reduce the historic architectural resources impact that would result under the proposed project. The Partial Preservation Alternative would not avoid the significant impact altogether because although it would retain 23 feet of the main, street-facing façade of the historic building and many of its attendant character-defining features, the Partial Preservation Alternative would demolish roughly two-thirds of the remaining original building, reconfigure its interior spaces, install an approximately 9-foot by 7-foot-wide wooden sectional garage door at the far right side of the main, street facing façade, and introduce a two-story addition above the existing building, which, taken together, would adversely impact the integrity of materials, workmanship, design, and to a lesser degree integrity of feeling, setting, of the 150 Eureka Street building. Therefore, under the Partial Preservation Alternative the integrity of the 150 Eureka Street building, which has been determined to be individually eligible for listing on the CRHR and thus a historical resource under CEQA, would be substantially altered such that the building would no longer convey its significance as a historical resource under CEQA. Therefore, while the Partial Preservation Alternative would reduce the impact to the historical resource by retaining most of the existing building and many of its character-defining features, implementation of the Partial Preservation Alternative would nonetheless result in significant unavoidable project-level impact to historic architectural resources. Similar to the proposed project, implementation of **Mitigation Measure M-CR-1a: Documentation** and **Mitigation Measure M-CR-1b: Interpretive Program** would be required with development of the Partial Preservation Alternative.

Similar to the proposed project, the Partial Preservation Alternative would result in either less-than-significant impacts or less-than-significant impacts with mitigation for the other environmental topics discussed in the NOP/IS.

Ability to Meet Project Objectives

The Partial Preservation Alternative would meet most of the project objectives, although not to the same extent as the proposed project, as more fully described below.

1. Although the Partial Preservation Alternative would re-develop a large underutilized site with high-quality, sustainable, and economically feasible residential dwelling units within the existing density designation for the site and also help to meet the projected City housing needs, this alternative would not meet the sponsor's objectives to the same degree as the proposed project. The overall living space for each unit and the size of bedrooms would be reduced compared to the proposed project (from three- and four-bedroom to three-bedroom units only). In addition, although the Partial Preservation Alternative would provide off-street parking and include a rear yard or midblock open space as proposed by the project, these spaces would be reduced as compared to the proposed project.
2. Although the Partial Preservation Alternative would result in the retention of the historic architectural resource on the site, the vertical and horizontal additions that would be required to accommodate residential uses within the existing building would not result in the development of a project that achieves high-quality urban design and current sustainability standards, is sensitive to and compatible with its residential surroundings, and enhances the existing urban design character of the area to the same degree as the proposed project.
3. The Partial Preservation Alternative would result in the construction of residential units on the site to contribute to the City's General Plan Housing Element goals and the Association of Bay Area Governments (ABAG) Regional Housing Needs Allocation for the City and County of San Francisco and would meet this project objective.
4. The Partial Preservation Alternative would not provide a new midblock open space to enhance the quality of life for the project's residents and neighbors.
5. Compared to the proposed project, the Partial Preservation Alternative would not result in the construction of a high-quality project that will produce a reasonable return on investment

for the project sponsor and its investors and attract investment capital and construction financing due to the structural deficiencies in the existing building.⁷

ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Pursuant to CEQA Guidelines section 15126(e)(2), an EIR is required to identify the environmentally superior alternative from among the alternatives evaluated if the proposed project has significant impacts that cannot be mitigated to a less-than-significant level. The Environmentally Superior Alternative is the alternative that best avoids or lessens any significant effects of the proposed project, even if the alternative would impede to some degree the attainment of the project objectives. The No Project Alternative is considered the overall environmentally superior alternative because implementation of the proposed project would not occur with the No Project Alternative, and therefore would not result in significant impacts related to historic architectural resources.

If the No Project Alternative is environmentally superior, CEQA requires selection of the “environmentally superior alternative other than the no project alternative” from among the other alternatives evaluated. The proposed project would result in a significant and unavoidable project-level impact related to historical architectural resources. Although the Partial Preservation Alternative would result in a design that meets most of the project’s objectives, its implementation would nonetheless result in significant and unavoidable adverse impacts. The Full Preservation Alternative would be the environmentally superior alternative because, unlike the proposed project or the Partial Preservation Alternative, it would result in less-than-significant impacts related to historic architectural resources, and **Mitigation Measure M-CR-1a: Documentation** and **Mitigation Measure M-CR-1b: Interpretive Program**, pp. 85–87, would not be required. In addition, potential conflicts with the general plan urban design element and Accountable Planning Initiative policies related to the preservation of historic resources would be avoided. Moreover, of the alternatives

⁷ Santos & Urrutia Structural Engineers, *Soundness Report for Existing Building at 150 Eureka Street, San Francisco, California*, December 22, 2016.

considered, the Full Preservation Alternative would require the least amount of physical alteration to the 150 Eureka Street historic architectural resource. More specifically, the Full Preservation Alternative would maintain most of the original building envelope, modify portions of the secondary and rear-facing façade, with no vertical or horizontal additions and the distinct features of the building that contribute to the integrity of the resource, such as the street facing building façade and original gable roof, the large, multi-paned, arched window, original main entrance, stucco cladding and brick water table would be retained. As the alternative with the least amount of physical alteration and preservation of all of the character-defining features, it would result in the fewest impacts to this LGBTQ-associated historical architectural resource.

ALTERNATIVE CONSIDERED BUT REJECTED

Pursuant to CEQA Guidelines section 15126.6(c), an EIR should “identify any alternatives that were considered by the lead agency but rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency’s determination.” The screening process for identifying viable EIR alternatives included consideration of the following criteria: ability to meet the project objectives; potential ability to substantially lessen or avoid significant environmental effects associated with the proposed project; and potential feasibility. The discussion below describes the alternatives considered, and provides the reasons for eliminating these alternatives from detailed consideration in the EIR.

A number of potential full and partial preservation alternatives were considered by the project sponsor and the planning department prior to development of the Full Preservation and Partial Preservation alternatives discussed in this EIR. These potential alternatives generally considered a greater number of alterations and greater massing than the Full Preservation and Partial Preservation alternatives and in some cases included fewer residential units. Ultimately, the project sponsor and planning department staff rejected these potential alternative designs and arrived at the alternatives presented and fully evaluated in this chapter as these alternatives were deemed to be more compatible with the site surroundings and would have the potential to meet more of the project sponsor’s objectives.

An off-site alternative was also considered and would consist of a similar project design and programming, but in a different though comparable infill location within the city. However, the project sponsor does not control any other property within the city. An off-site location was therefore not available for analysis and an off-site alternative was rejected for further consideration because the project sponsor does not have any site under its control that could be developed and meet the sponsor's objectives.

One commenter on the NOP/IS identified an alternative to the proposed project that would retain the exterior of the building and convert the interior to residential units while retaining a portion of the site as small public space with a museum. This alternative was considered and rejected from further analysis because development and operation of a museum would not meet any of the project sponsor's objectives and would likely reduce the number of residential units that could be developed on the site.

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VII. REPORT PREPARERS

REPORT AUTHORS

San Francisco Planning Department

1650 Mission Street, Suite 400

San Francisco, CA 94103

Environmental Review Officer: Lisa Gibson

Senior Environmental Planner: Joy Navarrete

Environmental Planner: Jenny Delumo

Historic Preservation Planner: Marcelle Boudreaux

ENVIRONMENTAL CONSULTANTS

LSA Associates, Inc.

2215 Fifth Street

Berkeley, CA 94701

Principal-in-Charge/Project Manager: Theresa Wallace

Architectural Historian, Michael Hibma, RPH

Planner: Matt Kawashima

Support Staff: Patty Linder, Charis Hanshaw

Tim Kelley Consulting, LLC

2912 Diamond Street, #330

San Francisco, CA 94131

Historic Resources Consultant: Tim Kelley

PROJECT SPONSOR

150 Eureka Street LLC

3501 California Street, Suite 200

San Francisco, CA 94118

Project Sponsor: David Papale

SPONSOR'S ATTORNEY

Reuben, Junius & Rose, LLP

One Bush Street, Suite 600

San Francisco, CA 94104

Project Attorney: David Silverman

ARCHITECT

Gary Gee Architects

98 Brady Street, #8

San Francisco, CA 94103

Project Architect: Gary Gee, AIA

APPENDIX A
NOTICE OF PREPARATION/INITIAL STUDY



SAN FRANCISCO PLANNING DEPARTMENT

Notice of Preparation of an Environmental Impact Report

Date: May 24, 2017
Case No.: **2015-011274ENV**
Project Title: **150 Eureka Street**
Zoning: RH-2 District: Residential House, Two-Family
40-X Height and Bulk District
Block/Lot: 2692/007
Lot Size: 6,246 square feet
Project Sponsor: David Papale, 150 Eureka Street LLC
(415) 244-2592
Lead Agency: San Francisco Planning Department
Staff Contact: Jenny Delumo – (415) 575-9146
jenny.delumo@sfgov.org

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

Reception:
415.558.6378

Fax:
415.558.6409

Planning
Information:
415.558.6377

PROJECT DESCRIPTION

The 150 Eureka Street project site is located within a developed City block bounded by 18th Street to the north, Eureka Street to the east, 19th Street to the south, and Douglass Street to the west in the Castro/Upper Market neighborhood of San Francisco. The project site is surrounded by existing residential uses.

The project site is currently developed with a two-story approximately 29-foot-tall wood-frame building constructed in approximately 1922. The existing building most recently housed the Metropolitan Community Church (MCC) of San Francisco, which consisted of a Lesbian, Gay, Bisexual, Transgender, Queer (LGBTQ) congregation from approximately 1970 to 2015. The building is currently vacant. The building is considered to be individually eligible for listing on the California Register of Historic Places due to its association with the City's LGBTQ community. There is no existing vegetation on the project site itself; however, two street trees are located in front of the building. The topography of the site is generally level, and Eureka Street slopes gradually upward to the south.

The proposed 150 Eureka Street Project would result in the demolition of the existing two-story, wood-frame church building located at the site and construction of two four-story buildings each with a total of two residential units in each building. The two buildings would total approximately 13,174 gross square feet (gsf) in size, and each would include a four-car garage and indoor common areas. The proposed buildings would not exceed 40 feet in height.

FINDING

This project may have a significant effect on the environment and an Environmental Impact Report is required. This determination is based upon the criteria of the State CEQA Guidelines, Sections 15063 (Initial Study), 15064 (Determining Significant Effect), and 15065 (Mandatory Findings of Significance), and for the reasons documented in the Environmental Evaluation (Initial Study) for the project, which is attached.

ALTERNATIVES

Alternatives to be considered for this project will include, but not be limited to, the No Project Alternative and one or more alternatives that preserve all or most of the historic resource located at 150 Eureka Street. This determination is based upon the criteria of the State CEQA Guidelines, Section 15126.6 (Consideration and Discussion of Alternatives to the Proposed Project).

PUBLIC SCOPING PROCESS

Written comments will be accepted until 5:00 p.m. on June 23, 2017. Written comments should be sent to Jenny Delumo, Environmental Planner, San Francisco Planning Department, 1650 Mission Street, Suite 400, San Francisco, CA 94103.

If you work for a responsible State agency, we need to know the views of your agency regarding the scope and content of the environmental information that is germane to your agency's statutory responsibilities in connection with the proposed project. Your agency may need to use the EIR when considering a permit or other approval for this project. Please include the name of a contact person in your agency.

Members of the public are not required to provide personal identifying information when they communicate with the Commission or the Department. All written or oral communications, including submitted personal contact information, may be made available to the public for inspection and copying upon request and may appear on the Department's website or in other public documents.

5/24/17

Date



Lisa M. Gibson
Environmental Review Officer

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150 Eureka Street

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ACRONYMS AND ABBREVIATIONS

AB	Assembly Bill
ABAG	Association of Bay Area Governments
ACMs	asbestos-containing materials
AC Transit	Alameda-Contra Costa County Transit District
BAAQMD	Bay Area Air Quality Management District
BART	Bay Area Rapid Transit
Basin Plan	Water Quality Control Plan for the San Francisco Bay Basin
BMPs	best management practices
Cal OSHA	California Occupational Safety and Health Administration
CEQA	California Environmental Quality Act
CCAA	California Clean Air Act
CGS	California Geological Survey
City	City of San Francisco
CO	carbon monoxide
dB	decibel
dBA	decibel (A-weighted)
DBI	Department of Building Inspection
DPH	Department of Public Health
EP	Environmental Planning
ERO	Environmental Review Officer
FARR	Final Archeological Resource Report
FTA	Federal Transit Administration
General Plan	San Francisco General Plan
GHG	greenhouse gas
Golden Gate Transit	Golden Gate Bridge Highway and Transit District
gsf	gross square feet
HCD	California Department of Housing and Community Development
HEPA	High Efficiency Particulate Air Filter
HVAC	heating, ventilation and air conditioning
I-80	Interstate 80
in/sec	inches per second
ITE	Institute of Transportation Engineers
IWMP	Integrated Waste Management Plan
L _{dn}	day-night noise level
LGBTQ	Lesbian, Gay, Bisexual, Transgender, Queer
LID	low impact design
MBTA	Migratory Bird Treat Act
MCC	Metropolitan Community Church
MLD	Most Likely Descendant
MRZ-4	Mineral Resource Zone 4
MTC	Metropolitan Transportation Commission
Muni	San Francisco Municipal Railway
Muni Metro	San Francisco light rail

NAHC	California State Native American Heritage Commission
NO ₂	nitrogen dioxide
Noise Ordinance	San Francisco Noise Ordinance
NOP	Notice of Preparation
NPDES	National Pollutant Discharge Elimination System
NWIC	Northwest Information Center
PAR	Preliminary Archeological Review
Planning Code	San Francisco Planning Code
PM	particulate matter
PM _{2.5}	PM composed of particulates that are 10 microns in diameter or less
PM ₁₀	PM composed of particulates that are 2.5 microns in diameter or less
PPV	peak particle velocity
RMS	root mean square
RWQCB	Bay Area Regional Water Quality Control Board
SB	Senate Bill
SF-CHAMP	San Francisco Chained Activity Model Process
SFBAAB	San Francisco Bay Area Air Basin
SFCTA	San Francisco County Transportation Authority
SFFD	San Francisco Fire Department
SFMTA	San Francisco Municipal Transportation Agency
SFPD	San Francisco Police Department
SFPL	San Francisco Public Library
SFPUC	San Francisco Public Utilities Commission
SFPW	San Francisco Public Works
SFTP	San Francisco Transportation Plan
SFUSD	San Francisco Unified School District
SO ₂	sulfur dioxide
TACs	toxic air contaminants
TAZ	transportation analysis zones
TCR	tribal cultural resource
Transportation Authority	San Francisco County Transportation Authority
TSF	Transportation Sustainability Fee
U.S. 101	U.S. Highway 101
USGS	United States Geological Survey
UWMP	Urban Water Management Plan
VdB	decibel notation
VOC	volatile organic compound
VMT	vehicle miles traveled

Initial Study
150 Eureka Street Project
Planning Department Case No. 2015-011274ENV

The proposed 150 Eureka Street Project (project) would result in the development of four residential units on a 6,246-square-foot parcel (Assessor's Block 2692, Lot 007) located at 150 Eureka Street in the Castro/Upper Market neighborhood in the City of San Francisco (City). The project would result in the demolition of the existing vacant two-story, wood-frame church building located at the site and construction of two four-story buildings each with a total of two residential units. The two buildings would total approximately 13,174 gross square feet (gsf) in size, and each would include a four-car garage and indoor common areas. The proposed buildings would not exceed 40 feet in height. A complete description of the proposed project, a detailed description of the proposed project's regional and local context, planning process and background, as well as a discussion of requested project approvals is included below.

A. PROJECT SITE

The approximately 6,246-square-foot project site is located in the Castro/Upper Market neighborhood and is located within a developed City block bounded by 18th Street to the north, Eureka Street to the east, 19th Street to the south, and Douglass Street to the west. The site is located on the west side of Eureka Street, at 150 Eureka Street (Assessor's Block 2692, Lot 007). **Figure 1** shows the location of the project site and **Figure 2** provides an aerial view of the site. **Figure 3** illustrates existing site conditions.

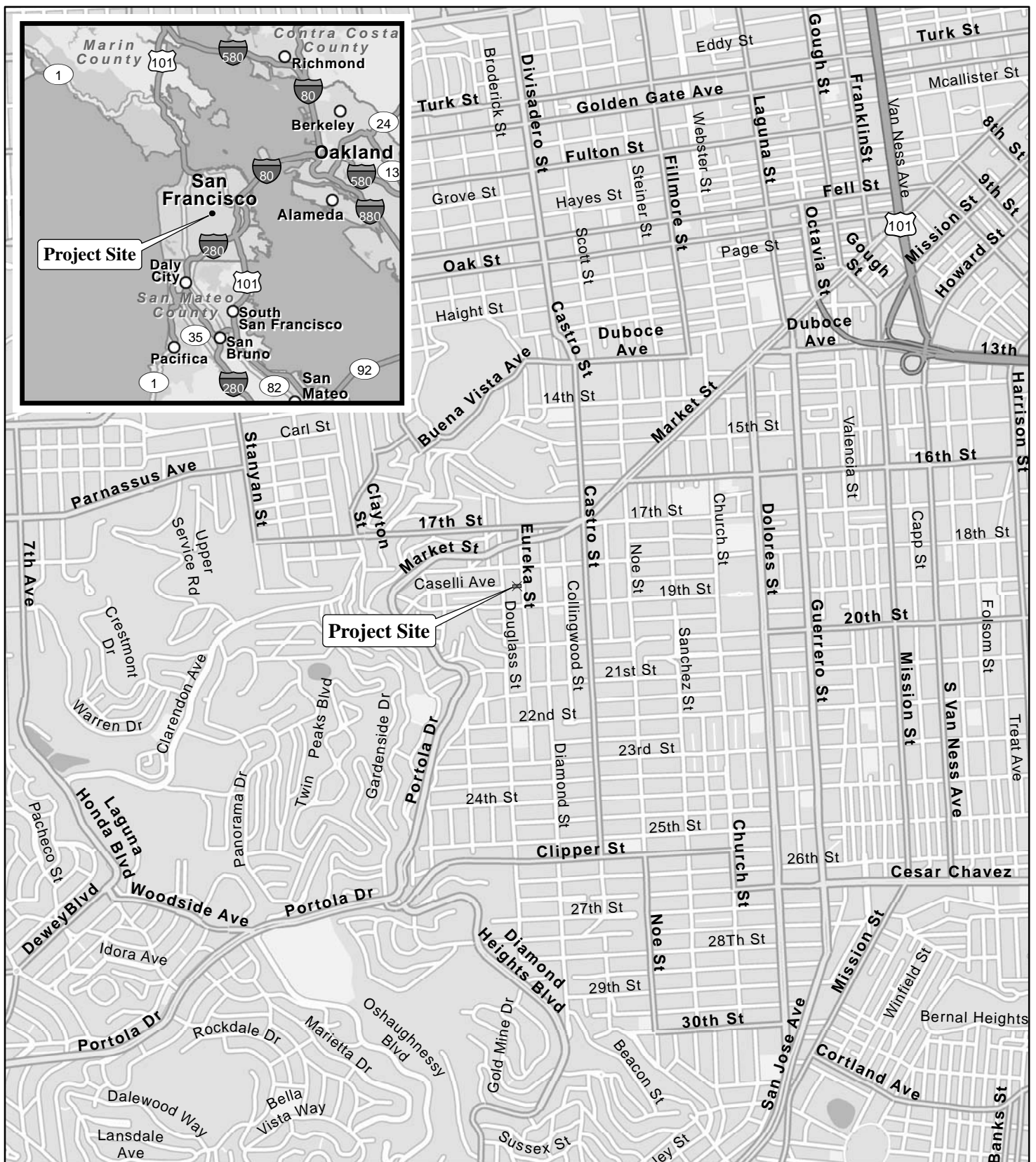
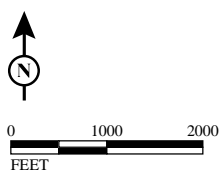


FIGURE 1

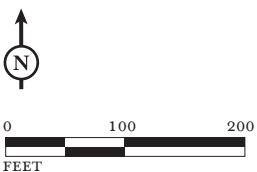



SOURCE: ESRI StreetMap North America (2012).

150 Eureka Street Project IS
Project Location and Regional Vicinity Map



FIGURE 2



 Project Site

SOURCES: GOOGLE EARTH, 4/5/16; LSA ASSOCIATES, INC., 2016.

150 Eureka Street Project IS
Project Site and Surrounding Land Uses

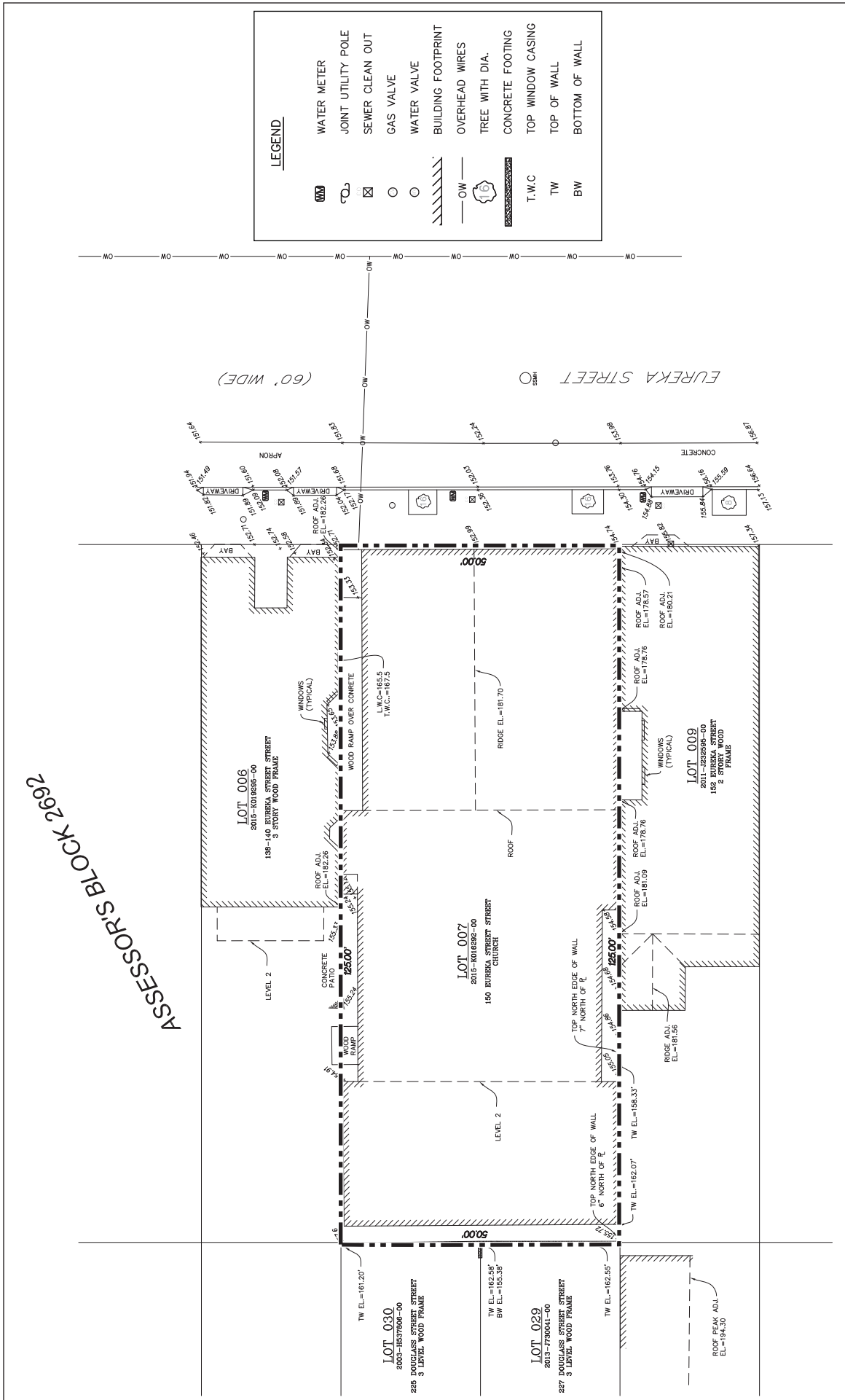


FIGURE 3

150 Eureka Street Project IS
Existing Site Conditions

The project site is currently developed with a two-story approximately 29-foot-tall wood-frame building constructed in approximately 1922. The building is set back approximately 9 inches from the property line at the street front and 3 feet from the rear property line. Sideyard setbacks are 3 feet, 4 inches on the north and range from 3 to 4 feet on the south. There is no existing vegetation on the project site itself; however, two street trees are located in front of the building. The topography of the site is generally level, and Eureka Street slopes gradually downward to the northeast. A total of three on-street parking spaces are located in front of the building on the Eureka Street frontage.

The existing building most recently housed the Metropolitan Community Church (MCC) of San Francisco, which consisted of a Lesbian, Gay, Bisexual, Transgender, Queer (LGBTQ) congregation from approximately 1970 to 2015. The building is currently vacant.¹ The building is considered to be individually eligible for listing on the California Register of Historic Places due to its association with the City's LGBTQ community.^{2,3}

B. PROPOSED PROJECT

The project sponsor proposes to demolish the existing building on the site, split the existing lot into two lots, and construct two, four-story buildings with a total of four residential units and eight ground floor parking spaces within a total building area of approximately 13,174 gsf. Each building would be a maximum of 40 feet tall. Landscaping is proposed along the building frontage on Eureka Street. In addition, an approximately 1,116-gsf rear yard and an approximately 263-gsf penthouse deck would provide on-site open space for use by project residents.

¹ Annie Steinberg-Behrman, Provisional Pastor, MCC San Francisco. Written communication to San Francisco Planning Department Regarding 150 Eureka Street, San Francisco, CA, November 1, 2016. This document (and all other documents cited in this Initial Study, unless otherwise noted) is available for review at the San Francisco Planning Department, 1650 Mission Street, Suite 400, as part of Case File No. 2015-011274ENV.

² Marcelle Boudreaux, Preservation Planner, San Francisco Planning Department, *Historic Resource Evaluation Response, 150 Eureka Street*, August 17, 2016.

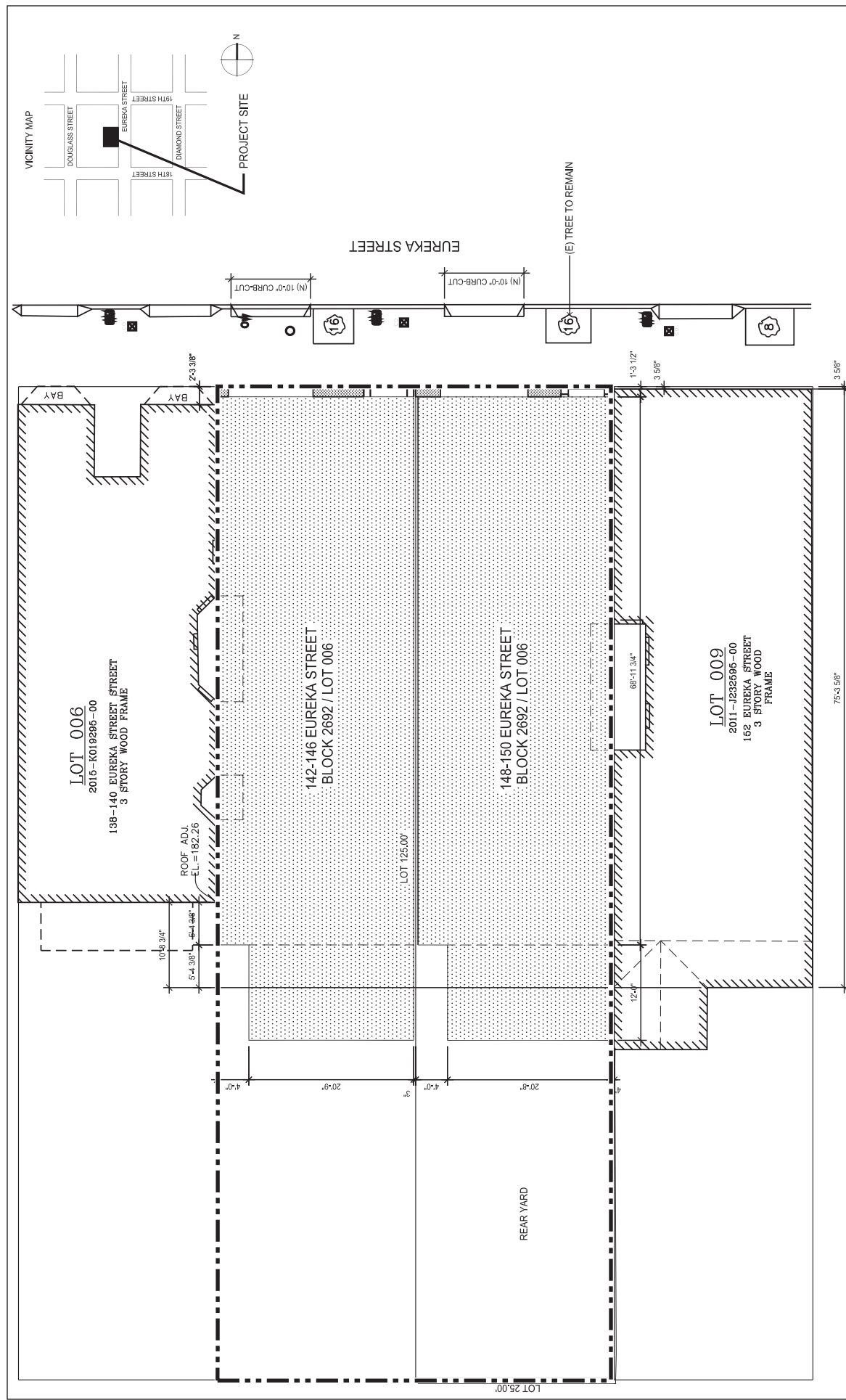
³ Tim Kelley Consulting, LLC, *Part I Historical Resource Evaluation, 150 Eureka Street, San Francisco, California*, Revised May 2016.

The conceptual site plan for the proposed project is depicted in **Figure 4**. Floor plans for each individual building, referred to as “142-146 Eureka Street” and “148-150 Eureka Street” are depicted in **Figures 5 through 8**. Conceptual front and rear building elevations are shown in **Figures 9 and 10**, respectively. **Figures 11 and 12** depict representative building sections for the 142-146 Eureka Street and 148-150 Eureka Street buildings, respectively.

Project Building Characteristics

The proposed project would result in the lot split construction of two immediately adjacent condominium buildings, each with four levels of living area within two separate residential units. The building at 142-146 Eureka Street would be approximately 6,604 gsf and the building at 148-150 Eureka Street would be approximately 6,570 gsf. As shown in **Figures 5 through 8**, within each building, one three-bedroom unit would occupy a portion of the ground level and the second level and one four-bedroom unit would occupy the third and fourth levels. Each individual unit would range from approximately 1,850 to 2,640 gsf in size. Approximately 275 gsf of indoor common areas would be provided within each building, consisting of building entry way, stairwells, and storage areas.

Each building would be set back between approximately 1 and 3.5 feet from the street front property line at grade and stepped back up to 10 feet from the building façade at the fourth level. Each building would be set back approximately 42 feet from the rear property line. Sideyard setbacks would be approximately 4 feet wide and 12 feet deep at the ground level of the northwest building corner and 3 feet at the upper floors on the north and south.



NOT TO SCALE

 Project Boundary

150 Eureka Street Project IS
Conceptual Site Plan

SOURCE: GARY GEE, AIA, OCTOBER 2016.

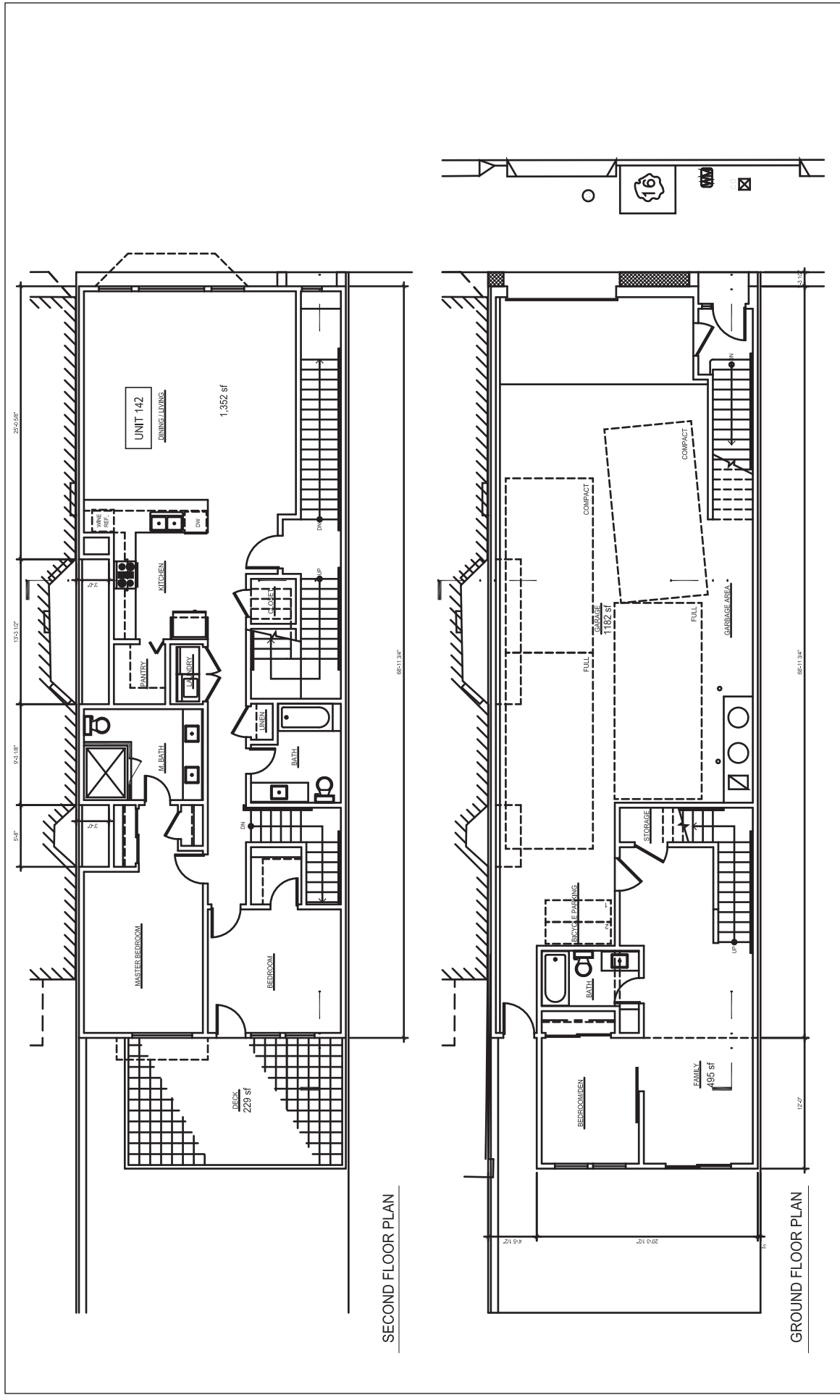
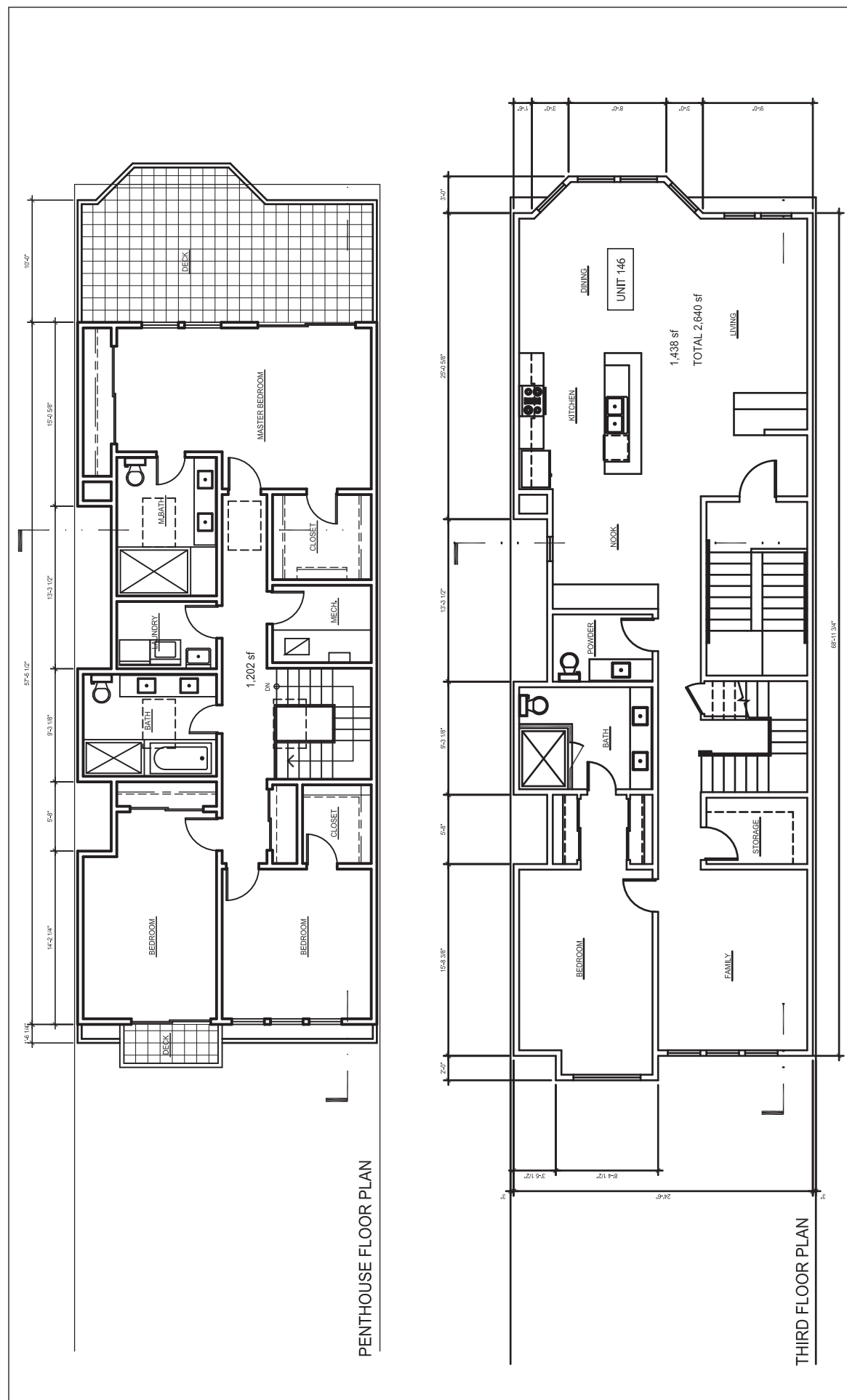


FIGURE 5



NOT TO SCALE

150 Eureka Street Project IS
142-146 Eureka Street - Conceptual Third and Fourth Floor Plans

SOURCE: GARY GEE, AIA, 2015.

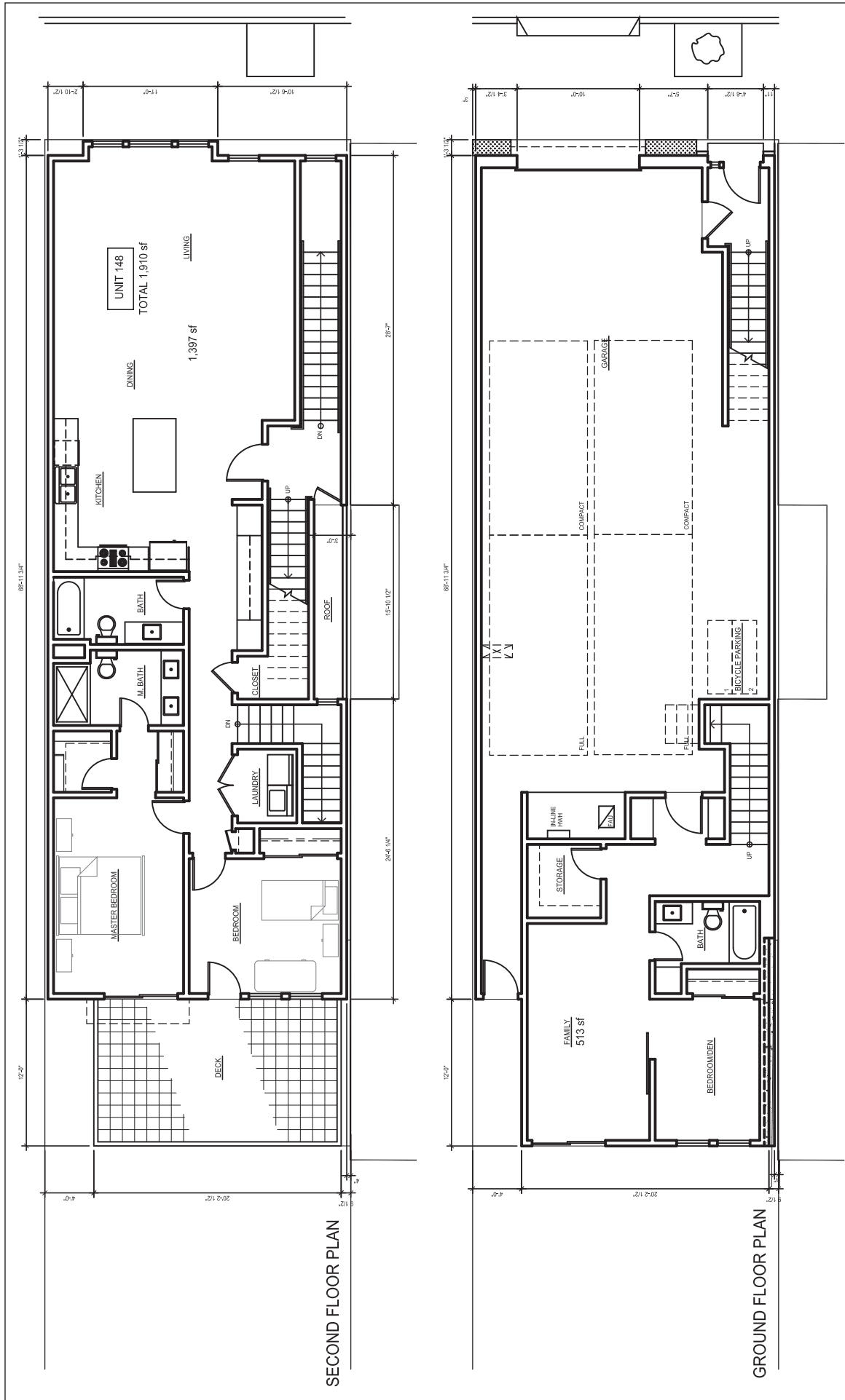


FIGURE 7





FIGURE 8



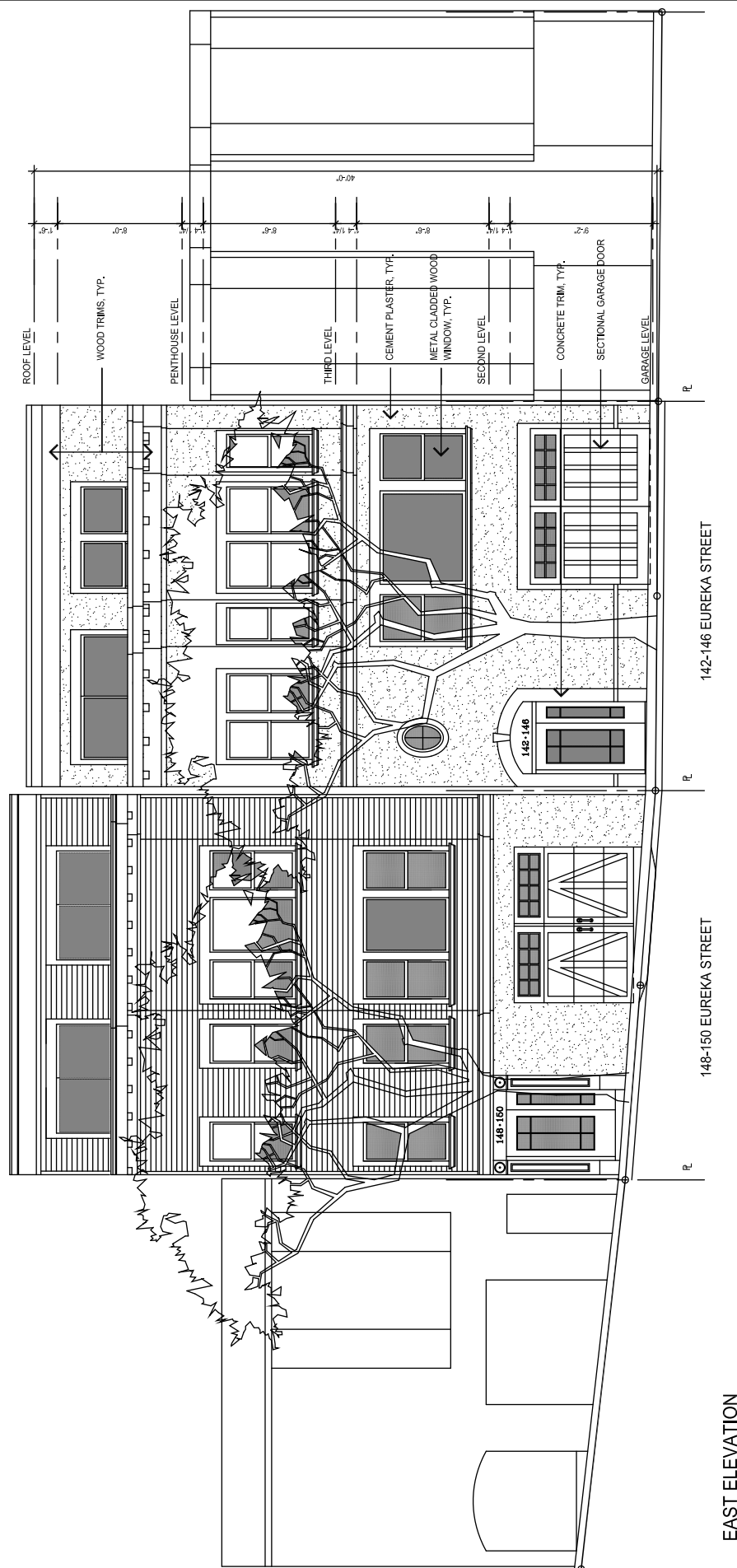


FIGURE 9

NOT TO SCALE

150 Eureka Street Project IS

Conceptual East (Street Front) Elevations

SOURCE: GARY GEE, AIA, 2015.



NOT TO SCALE

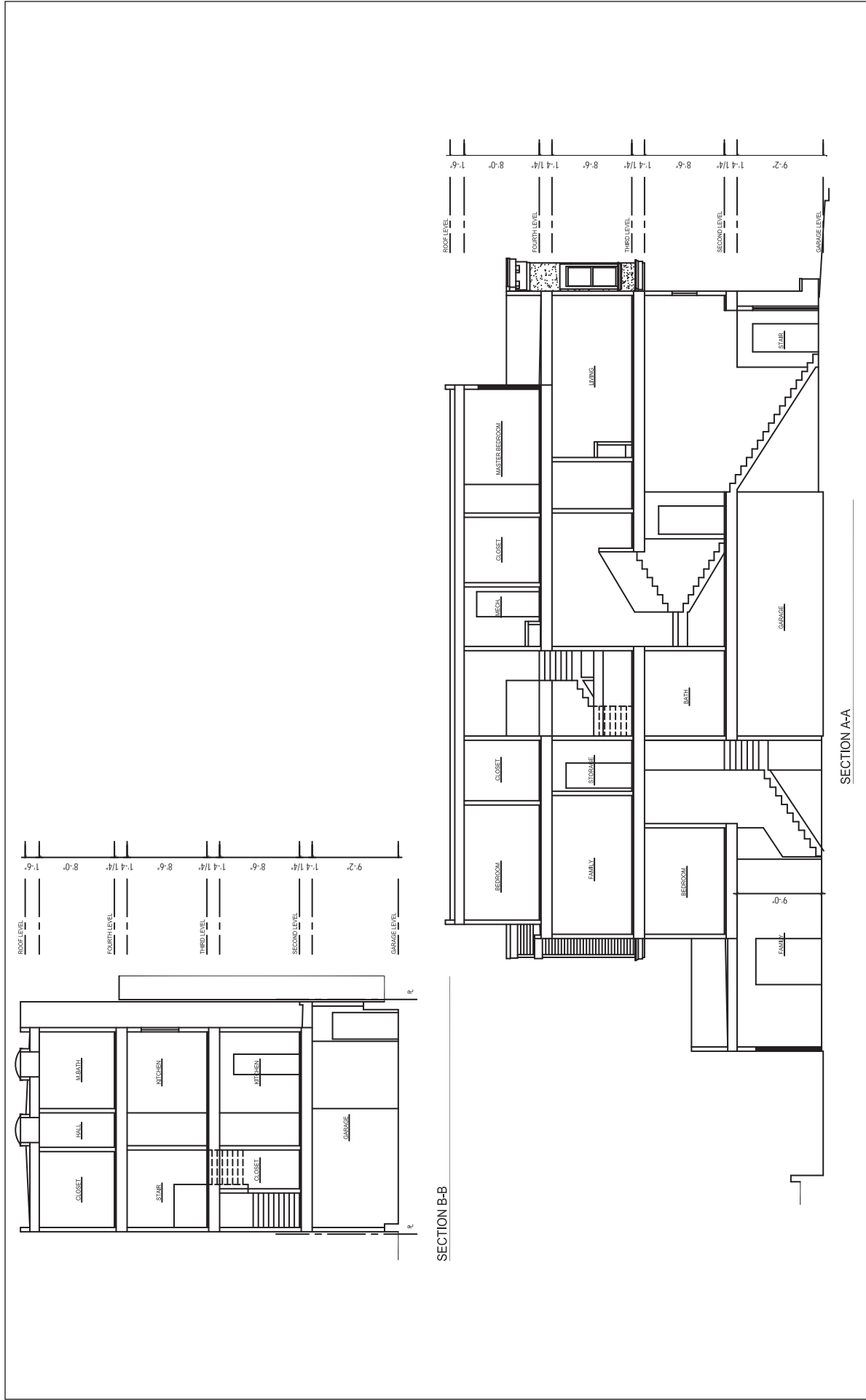


FIGURE 11

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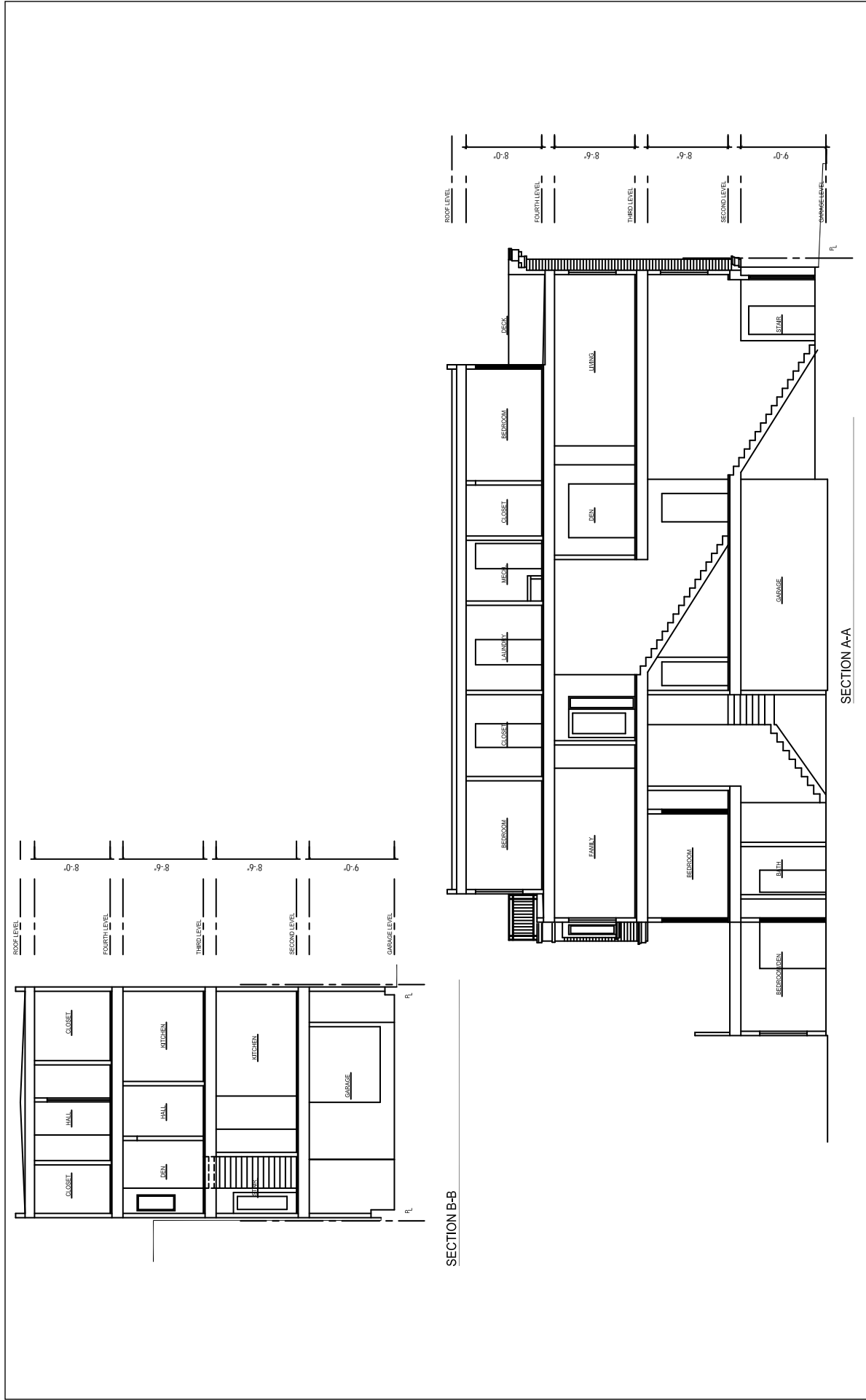


FIGURE 12

NOT TO SCALE

Open Space and Landscaping

A total of approximately 2,736 square feet of common open space for use by project residents would be developed in the form of rear yards and penthouse decks as part of the proposed project. Specifically, the 141-146 Eureka Street site would include an approximately 1,116-square-foot rear yard and an approximately 263-square-foot private penthouse deck for the upstairs unit. The 148-150 Eureka Street site would include an approximately 1,089-square-foot rear yard and an approximately 268-square-foot private penthouse deck for the upstairs unit. In addition, the project would include landscaping along the Eureka Street frontage and the two existing street trees would be retained.

An approximately 40-foot-long concrete retaining wall would be constructed on the south property line between the existing adjacent 152 Eureka Street and 148-150 Eureka Street rear yards. Beginning from the southwest corner of the 148-150 Eureka Street lot the wall would be 7 feet high and 27 feet long. After 27 feet, the retaining wall would step down to 3 feet, 6 inches high for the remaining length of 13 feet.

Access and Parking

Access to the site would be provided via Eureka Street. Resident access to each unit would be provided by a common entryway and from within the ground level garage. A total of eight parking spaces (four full sized and four compact) would be provided on site. The 142-146 Eureka Street building would provide approximately 1,182 gsf of indoor common garage area and the 148-150 Eureka Street building would provide approximately 1,158 gsf of common indoor garage area. Each garage would include two tandem spaces, for four vehicles each. In addition, each parking garage would provide two Class 1 bicycle parking spaces. New curb cuts for each proposed garage access driveway would be 10 feet in width. Two of the three existing on-street parking spaces on the Eureka Street frontage would be removed to accommodate the new garage entrances, subject to approval by the San Francisco Municipal Transportation Agency (SFMTA).

Demolition and Construction

Construction activities at the project site would begin with demolition of the existing on-site structure and removal of all existing on-site pavements. A total of 6,000 cubic yards of soil would be excavated

from the site to accommodate new foundations and utility connections. Construction of the proposed project is anticipated to occur over an 18 month period. The proposed project would connect to existing water, sewer, electrical, natural gas, and telecommunications connections available at the perimeter of the project site along Eureka Street. The two existing street trees that border the project site would be retained and protected during construction.

C. PROJECT APPROVALS

The project is located in the RH-2 (Residential House, Two-Family) residential zoning district and within the 40-X height and bulk district. The proposed project would require the following City, State, and regional approvals. These approvals may be considered in conjunction with the required environmental review, but will not be granted until the required environmental review has been completed:

Planning Commission

- Planning Commission certification of the EIR.

Actions by Other City Departments

- SFMTA's approval of proposed removal of on-street parking spaces and new curb cuts;
- Approval of demolition and building permits by the Department of Building Inspection (DBI);
- Approval of proposed condominiums and tentative subdivision maps; recommendation to the Board of Supervisors for approval of a final subdivision map, and approval of proposed curb cuts by San Francisco Public Works (SFPW);
- SFPW's approval of permits for streetscape improvements in the public right-of-way, including two curb cuts on Eureka Street;
- San Francisco Department of Public Health (DPH) approval of Dust Control Plan; and
- Bay Area Air Quality Management District (BAAQMD) approval of an Asbestos Dust Mitigation Plan.

D. PROJECT SETTING

As previously noted, the project site occupies a parcel located midblock on Eureka Street between 18th and 19th Streets. Eureka Street is approximately 42 feet wide with vehicular traffic lanes in both the northbound and southbound directions. Parallel parking is available on both sides of the street. Douglass Street is approximately 30 feet wide and runs parallel with Eureka Street with traffic lanes running in both the northbound and southbound directions. 18th Street is approximately 40 feet wide and 19th Street is approximately 35 feet wide, and each flow in eastbound and westbound directions. San Francisco Municipal Railway (Muni) bus stops are located in the project site vicinity at Eureka and 18th Streets and Eureka and 19th Streets. In addition, two bicycle routes are located on Eureka Street including Route 19 and Route 49.⁴

Existing uses within the same block as the 150 Eureka Street site consist primarily of two- to three-story medium-density residential uses. Three-story residential uses border the site to the north and west and a two-story residential building borders the site to the south. Uses near 18th and 19th Street consist of some neighborhood-serving commercial and office uses. **Figure 2** identifies surrounding land uses within the vicinity of the site.

E. CUMULATIVE SETTING

Past, present and reasonably foreseeable cumulative development projects within a 0.25-mile radius of the project site include a number of residential additions and renovations as well as new construction. Table 1 includes a list of all cumulative development projects in the vicinity. Of those cumulative projects, only those at 4517 18th Street, 160 Caselli Drive, 132 Corbett Avenue, 4360 19th Street, 53 States Street, and 4072 18th Street would intensify land uses in the vicinity. In total, these cumulative projects would result in the addition of 8 residential units. These cumulative projects are either under construction or the subject of an Environmental Evaluation Application on file with the Planning Department.

⁴ San Francisco Planning Department, Transportation Study Determination Request Case No. 2015-011274ENV, 150 Eureka Street, 415.558.6378, October 25, 2016.

Table 1: Cumulative Projects in the Project Vicinity

Address	Case No.	Project Status– Environmental Review:	Net New Dwelling Units	Description
4517 18th St (1 block away)	2016-014999	Under Way	1	New accessory dwelling unit
433 Douglass St (2 blocks away)	2016-008861PRJ	Under Way	0	Vertical Addition - new level
112 Yukon St (4 blocks away)	2016-011349PRJ	Under Way	1	Vertical Addition - new level
160 Caselli Ave (3 blocks away)	2016-010185	Complete	1	Demolition of existing single-family home and construction of 3-story building
52 Yukon St (4 blocks away)	2016-012625ENV	Complete	0	Horizontal rear expansion at each level
4565 19th St (2 blocks away)	2016-011618ENV	Complete	0	Vertical Addition - new level
316 Douglass St (2 blocks away)	2015-006957ENV	Complete	0	Vertical Addition - new level
335 Diamond St (3 blocks away)	2016-003609ENV	Complete	0	Horizontal addition - expansion of third level
4618 19th St (3 blocks away)	2015-012303ENV	Complete	0	Horizontal rear expansion at each level
4612 19th St (3 blocks away)	2015-012021ENV	Complete	0	Vertical Addition - new level
316 Douglass St (2 blocks away)	2015-006957ENV	Complete	0	Vertical Addition - new level
219 Douglass St (1 block away)	2016-013500PRJ	Under Way	0	Horizontal addition - expansion of ground level
132 Corbett Ave (5 blocks away)	2014.0016	Under Way	1	New 3-story single family dwelling
4547 19th St (2 blocks away)	2016-011925PRJ	Under Way	0	Vertical addition
4360 19th St (1 block away)	2016-011673	Under Way	1	Change of use to add a unit
53 States St (6 blocks away)	2014-000018PRJ	Complete	2	Demolish single-family home and construct two unit building
4072 18th St (4 blocks away)	2014-003036PRJ	Under Way	1	Horizontal addition and new dwelling unit
331 Collingwood St (4 blocks away)	2014-001201PRJ	Under Way	0	Vertical and horizontal additions
333 Diamond St (3 blocks away)	2016-014677ENV	Under Way	0	Vertical Addition - new level
18 Romain St (4 blocks away)	2015-005537PRJ	Under Way	0	Vertical addition - expansion of second level
<i>Total</i>			8	

Source: San Francisco Planning Department, *Cumulative Projects List*. December 15, 2016.

F. COMPATIBILITY WITH ZONING AND PLANS

	<i>Applicable</i>	<i>Not Applicable</i>
Discuss any variances, special authorizations, or changes proposed to the Planning Code or Zoning Map, if applicable.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Discuss any conflicts with any adopted plans and goals of the City or Region, if applicable.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Discuss any approvals and/or permits from City departments other than the Planning Department or the Department of Building Inspection, or from Regional, State, or Federal Agencies.	<input checked="" type="checkbox"/>	<input type="checkbox"/>

San Francisco Planning Code and Zoning Maps

The San Francisco Planning Code (Planning Code) incorporates by reference the City's Zoning Maps, governs permitted uses, densities, and the configuration of buildings within San Francisco. Permits to construct new buildings (or to alter and demolish existing ones) may not be issued unless: 1) the proposed project conforms to the Planning Code; 2) allowable exceptions are granted pursuant to provisions of the Planning Code; or 3) legislative amendments to the Planning Code are included as part of the proposed project.

The project site is located in the RH-2 District. As stated in Planning Code Section 209.1, the RH-2 District allows up to two dwelling units per lot and up to one unit per 1,500 square feet of lot area with conditional use approval. This district also requires 125 square feet of open space for each unit. The proposed project would result in the development of four residential units within two buildings on the existing 6,246-square-foot lot. A total of 2,736 square feet of common open space would be developed in the form of rear yards and penthouse decks. The project would also require a lot split to allow for development of the four units under the RH-2 District. Within the RH-2 District, the proposed residential uses are principally permitted.

The project site is located within 40-X Height and Bulk District, which permits a maximum building height of 40 feet. The proposed project would be a maximum of 40 feet in height. Bulk controls reduce the size of a building's floorplates as the building increases in height. Pursuant to Planning Code Section 270(a), there are no bulk controls in an "X" Bulk District. Therefore, the proposed structure would comply with existing height and bulk controls.

According to Planning Code Section 151, two off-street parking spaces are permitted per dwelling unit. As the proposed project would include four dwelling units, the project would be allowed to provide eight off-street parking spaces. Thus, the proposed eight off-street parking spaces (four per building) would comply with Planning Code Section 151. Planning Code Section 155.2 requires new residential buildings to provide one secured (Class 1) bicycle parking space per each dwelling unit. As the proposed project would provide two Class 1 bicycle parking spaces in each garage (for a total of four spaces), the project would comply with the Planning Code's bicycle parking requirements.

Plans and Policies

San Francisco General Plan

The San Francisco General Plan (General Plan) establishes objectives and policies to guide land use decisions related to physical development in the City. It is comprised of ten elements, each of which addresses a particular topic that applies citywide: Air Quality; Arts; Commerce and Industry; Community Facilities; Community Safety; Environmental Protection; Housing; Recreation and Open Space; Transportation; and Urban Design.

Two General Plan elements that are particularly applicable to planning considerations associated with the proposed project are the Housing and Urban Design elements. These elements are discussed in more detail below. Other elements of the General Plan that are applicable to technical aspects of the proposed project include Air Quality, Community Safety; Recreation and Open Space; and Transportation. The proposed project's potential to conflict with the individual policies contained in these more technical elements is discussed in the appropriate topical sections of this Initial Study or the EIR.

Objectives of the General Plan's Urban Design Element that are applicable to the proposed project include emphasizing the characteristic pattern which gives the City and its neighborhoods an image, a sense of purpose, and a means of orientation and conserving resources which provide a sense of nature, continuity with the past, and freedom from overcrowding.

The proposed project would include the demolition of the existing building at 150 Eureka Street, which is considered a historic resource individually eligible for listing on the California Register of Historic Places due to its association with the City's LGBTQ community. For this reason, the proposed project would conflict with Policy 2.4 of the Urban Design Element, which calls for the preservation of notable landmarks and areas of historic, architectural, or aesthetic value. The physical environmental impacts that could result from this conflict will be discussed in the EIR.

The Housing Element Update was originally adopted by the Planning Commission on March 2011 and certified by the California Department of Housing and Community Development in July 2011.⁵ The key objective of the Housing Element is to promote the development of new housing in San Francisco and the retention of existing housing in a way that is protective of neighborhood identity, sustainable, and is served by adequate community infrastructure. A particular focus of the Housing Element is on the creation and retention of affordable housing, which reflects intense demand for such housing, a growing economy (which itself puts increasing pressure on the existing housing stock), and a constrained supply of land (necessitating infill development and increased density). In general, the Housing Element supports projects that increase the City's housing supply (both market-rate and affordable housing), especially in areas that are close to the City's job centers and are well-served by transit. The proposed project, which is a residential project consisting of four dwelling units, would not obviously conflict with any objectives or policies in the Housing Element.

Except for the conflict related to the demolition of the building on the project site, which is considered a historic resource due to its association with the LGBTQ community, the proposed project would not obviously or substantially conflict with any goals, policies, or objectives of the General Plan. A conflict between a proposed project and a General Plan policy does not, in itself, indicate a significant effect on the environment within the context of the California Environmental Quality Act (CEQA). Any physical environmental impacts that could result from such conflicts are analyzed in this Initial

⁵ Pursuant to a court order, the 2011 certification was set aside and a partially Revised Environmental Impact Report (Revised EIR) for the 2004 and 2009 Housing Element was later certified by the Planning Commission on April 24, 2014. No changes were made to the objectives or policies contained within the Housing Element as a result of this action.

Study (or will be analyzed in the EIR). In general, potential conflicts with the General Plan are considered by the decisions-makers (typically the Planning Commission) independently of the environmental review process. Thus, in addition to considering inconsistencies that affect environmental issues, the Planning Commission considers other potential inconsistencies with the General Plan independently of the environmental review process, as part of the decision to approve or disapprove a proposed project. Any potential conflict not identified in this environmental document would be considered in that context and would not alter the physical environmental effects of the proposed project that are analyzed in this Initial Study.

The Accountable Planning Initiative

In November 1986, the voters of San Francisco approved Proposition M, the Accountable Planning Initiative, which added Section 101.1 to the Planning Code to establish eight Priority Policies. These policies are: 1) preservation and enhancement of neighborhood-serving retail uses; 2) protection of neighborhood character; 3) preservation and enhancement of affordable housing; 4) discouragement of commuter automobiles; 5) protection of industrial and service land uses from commercial office development and enhancement of resident employment and business ownership; 6) maximization of earthquake preparedness; 7) landmark and historic building preservation; and 8) protection of open space. The Priority Policies, which provide general policies and objectives to guide certain land use decisions, contain certain policies that relate to physical environmental issues. Where appropriate these issues are discussed in the topical sections of this Initial Study.

The proposed demolition of the existing building at 150 Eureka Street would conflict with Priority Policy No. 7. The physical environmental effects that could result from this conflict will be discussed in the EIR.

Prior to issuing a permit for any project which requires an Initial Study under CEQA; prior to issuing a permit for any demolition, conversion, or change of use; and prior to taking any action which requires a finding of inconsistency with the General Plan, the City is required to find that the proposed project or legislation would be consistent with the Priority Policies. As noted above, the physical environmental effects of the project as they may relate to the Priority Policies are addressed in the analyses in this Initial Study. The information contained in this Initial Study will be referenced

as appropriate in the Planning Department's comprehensive project analysis and findings regarding the consistency of the proposed project with the Priority Policies.

Other Local Plans and Policies

In addition to the *General Plan*, the *Planning Code* and Zoning Maps, and the Accountable Planning Initiative, other local plans and policies that are relevant to the proposed project are discussed below.

- The *San Francisco Sustainability Plan* is a blueprint for achieving long-term environmental sustainability by addressing specific environmental issues including, but not limited to, air quality, climate change, energy, ozone depletion, and transportation. The goal of the *San Francisco Sustainability Plan* is to enable the people of San Francisco to meet their present needs without sacrificing the ability of future generations to meet their own needs.
- The *Climate Action Plan for San Francisco: Local Actions to Reduce Greenhouse Emissions* is a local action plan that examines the causes of global climate change and the human activities that contribute to global warming, provides projections of climate change impacts on California and San Francisco based on recent scientific reports, presents estimates of San Francisco's baseline greenhouse gas emissions inventory and reduction targets, and describes recommended actions for reducing the City's greenhouse gas emissions. The 2013 Climate Action Strategy is an update to this plan.
- The *Transit First Policy* (City Charter, Section 8A.115) is a set of principles that underscore the City's commitment to prioritizing travel by transit, bicycle, and on foot over travel by private automobile. These principles are embodied in the objectives and policies of the Transportation Element of the *General Plan*. All City boards, commissions, and departments are required by law to implement Transit First principles in conducting the City's affairs.
- The *San Francisco Bicycle Plan* is a citywide bicycle transportation plan that identifies short-term, long-term, and other minor improvements to San Francisco's bicycle route network. The overall goal of the *San Francisco Bicycle Plan* is to make bicycling an integral part of daily life in San Francisco.

- The *San Francisco Better Streets Plan* consists of illustrative typologies, standards, and guidelines for the design of San Francisco's pedestrian environment, with the central focus of enhancing the livability of the City's streets.
- *Transportation Sustainability Fee Ordinance* requires that development projects that filed environmental review applications prior to July 21, 2015, but have not yet received approval, pay 50 percent of the applicable Transportation Sustainability Fee (TSF). TSF funds may be used to improve transit services and pedestrian and bicycle facilities.

The proposed project has been reviewed in the context of these local plans and policies and would not obviously or substantially conflict with them. Staff reports and approval motions prepared for the decision-makers would include a comprehensive project analysis and findings regarding the consistency of the proposed project with applicable local plans and policies.

Regional Plans and Policies

There are several regional planning agencies whose environmental, land use, and transportation plans and policies consider the growth and development of the nine-county San Francisco Bay Area. Some of these plans and policies are advisory, and some include specific goals and provisions that must be considered when evaluating a project under CEQA. The regional plans and policies that are relevant to the proposed project are discussed below.

- The principal regional planning documents and the agencies that guide planning in the nine-county Bay Area include *Plan Bay Area*, the region's first Sustainable Communities Strategy, developed in accordance with Senate Bill 375 and adopted jointly by the Association of Bay Area Governments (ABAG) and the Metropolitan Transportation Commission (MTC) on July 18, 2013. *Plan Bay Area* is a long-range land use and transportation plan that covers the period from 2010 to 2040. *Plan Bay Area* calls for concentrating housing and job growth around transit corridors, particularly within areas identified by local jurisdictions as Priority Development Areas. In addition, *Plan Bay Area* specifies strategies and investments for maintaining, managing, and improving the region's multi-modal transportation network and proposes transportation projects and

programs to be implemented with reasonably anticipated revenue. *Plan Bay Area* will be updated every four years;

- *Plan Bay Area* includes the population and employment forecasts from ABAG's Projections 2013, which is an advisory policy document used to assist in the development of local and regional plans and policy documents, and MTC's 2040 *Regional Transportation Plan*, which is a policy document that outlines transportation projects for highway, transit, rail, and related uses through 2040 for the nine Bay Area counties;
- The *Regional Housing Needs Plan* for the San Francisco Bay Area: 2014–2022 reflects projected future population growth in the Bay Area region as determined by ABAG and addresses housing needs across income levels for each jurisdiction in California. All of the Bay Area's 101 cities and nine counties are given a share of the Bay Area's total regional housing need. The Bay Area's regional housing need is allocated to each jurisdiction by the California Department of Housing and Community Development (HCD) and finalized through negotiations with ABAG;
- The Bay Area Air Quality Management District (BAAQMD)'s 2010 *Clean Air Plan* updates the Bay Area 2005 Ozone Strategy, in accordance with the requirements of the California Clean Air Act (CCAA), to implement feasible measures to reduce ozone and provide a control strategy to reduce ozone, particulate matter (PM), air toxics, and greenhouse gas emissions throughout the region; and
- The San Francisco Regional Water Quality Control Board's *Water Quality Control Plan for the San Francisco Bay Basin (Basin Plan)* is a master water quality control planning document. It designates beneficial uses and water quality objectives for waters of the state, including surface waters and groundwater, and includes implementation programs to achieve water quality objectives.

The proposed project has been reviewed against these regional plans and policies. Due to the relatively small size and infill nature of the proposed project, there would be no anticipated conflicts with regional plans. Therefore, the proposed project would not obviously or substantially conflict with regional plans or policies.

G. SUMMARY OF ENVIRONMENTAL EFFECTS

Senate Bill 743 and Public Resources Code Section 21099

On September 27, 2013, Governor Brown signed Senate Bill (SB) 743, which became effective on January 1, 2014.⁶ Among other provisions, SB 743 amended CEQA by adding Public Resources Code Section 21099 regarding the analysis of aesthetics and parking impacts for certain urban infill projects in transit priority areas.⁷

Aesthetics and Parking Analysis

Public Resources Code Section 21099(d), effective January 1, 2014, provides that, “aesthetics and parking impacts of a residential, mixed-use residential, or employment center project on an infill site located within a transit priority area shall not be considered significant impacts on the environment.” Accordingly, aesthetics and parking are no longer to be considered in determining if a project has the potential to result in significant environmental effects for projects that meet all of the following three criteria:

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

⁶ California, State of. SB-743. Available online at: [leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201320140SB743](http://leginfo.ca.gov/faces/billNavClient.xhtml?bill_id=201320140SB743) (accessed February 20, 2017).

⁷ A “transit priority area” is defined as an area within 0.5 miles of an existing or planned major transit stop. A “major transit stop” is defined in California Public Resources Code Section 21064.3 as a rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods. A map of San Francisco Transit Priority Areas can be found online at sfmea.sfplanning.org/Map%20of%20San%20Francisco%20Transit%20Priority%20Areas.pdf (accessed July 22, 2015).

The proposed project meets each of the above three criteria and thus, this Initial Study does not consider aesthetics and the adequacy of parking in determining the significance of project impacts under CEQA.⁸

Public Resources Code Section 21099(e) states that a Lead Agency maintains the authority to consider aesthetic impacts pursuant to local design review ordinances or other discretionary powers and that aesthetics impacts do not include impacts on historical or cultural resources. As such, there will be no change in the Planning Department's methodology related to design and historic review.

Effects Found to Be Potentially Significant

This Initial Study evaluates the proposed 150 Eureka Street project to determine whether it would result in significant environmental impacts. The designation of topics as "Potentially Significant" in the Initial Study means that the EIR will consider the topic in greater depth and determine whether the impact would be significant. On the basis of this Initial Study, the topic for which there are project-specific effects that have been determined to be potentially significant is:

- Cultural Resources (historic architectural resources only).

This environmental topic will be evaluated in an EIR prepared for the proposed project.

Effects Found Not to Be Significant

The following potential individual and cumulative environmental effects were determined to be either less than significant or would be reduced to a less-than-significant level through recommended mitigation measures included in this Initial Study:

⁸ San Francisco Planning Department, Transit-Oriented Infill Project Eligibility Checklist, Case No. 2015-011274ENV, 150 Eureka Street, January 23, 2017.

- Land Use and Land Use Planning (all topics),
- Population and Housing (all topics),
- Cultural Resources (archeological resources, human remains, tribal cultural resources),
- Transportation and Circulation (all topics)
- Noise (all topics),
- Air Quality (all topics),
- Greenhouse Gas Emissions (all topics),
- Wind and Shadow (all topics),
- Recreation (all topics),
- Utilities and Service Systems (all topics),
- Public Services (all topics),
- Biological Resources (all topics),
- Geology and Soils (all topics),
- Hydrology and Water Quality (all topics),
- Hazards and Hazardous Materials (all topics),
- Mineral and Energy Resources (all topics), and
- Agricultural and Forest Resources (all topics).

These items are discussed with mitigation measures, where appropriate, in **Section H, Evaluation of Environmental Effects**, of this Initial Study, and require no environmental analysis in the EIR. All mitigation measures identified, including those for archaeological resources and construction noise are listed in **Section I, Mitigation Measures and Improvement Measures**, have been agreed to by the project sponsor, and will be incorporated into the proposed project. For items designated “Not Applicable” or “No Impact,” the conclusions regarding potential significant environmental effects are based upon field observations, staff and consultant experience and expertise on similar projects, and/or standard reference materials available within the San Francisco Planning Department, such as

the California Natural Diversity Database and maps published by the California Department of Fish and Wildlife, the California Division of Mines and Geology Mineral Resource Zone designations, and the California Department of Conservation's Farmland Mapping and Monitoring Program. For each checklist item, the evaluation has considered both individual and cumulative impacts of the proposed project.

H. EVALUATION OF ENVIRONMENTAL EFFECTS

Topics:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Not Applicable
1. LAND USE AND LAND USE PLANNING— Would the project:					
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Impact LU-1: The proposed project would not physically divide an established community. (*Less-Than-Significant Impact*)

The division of an established community would typically involve the construction of a barrier to neighborhood access (such as a new freeway segment) or the removal of a means of access (such as a bridge or roadway). The proposed project would result in the demolition of an existing two-story former church building and construction of two four-story, 40-foot-tall buildings with a total of four dwelling units. The proposed project would be incorporated into the existing street configuration and would not alter the established street grid or permanently close any streets or impede pedestrian or other travel through the neighborhood. Although portions of the sidewalks adjacent to the proposed project would likely be closed for periods of time during project construction, these closures would be temporary in nature and sidewalk access would be restored. The proposed project would not construct a physical barrier to neighborhood access or remove an existing means of access, such as a bridge or roadway which would create an impediment to the passage of persons or vehicles. As such, the proposed project would not physically divide an established community.

The established community surrounding the project site includes primarily residential uses. The existing building – previously occupied by a church facility – has been vacant since 2015. The proposed project would introduce a new residential use within an existing residential area and would not alter the land use pattern of the immediate area. The proposed project would not introduce any new land uses, such as industrial uses, that would either create potential conflicts through incompatible uses or result in disruptions to the community’s established land use patterns.

For these reasons, the proposed project would not physically divide an established community. This impact would be less than significant and no mitigation measures would be required. This topic will not be addressed in the EIR.

Impact LU-2: The proposed project would not conflict with applicable land use plans, policies or regulations of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect. (*Less-Than-Significant Impact*)

The proposed project would not substantially conflict with applicable plans, policies, or regulations, such that an adverse physical change would result. Land use impacts are also considered to be significant if the proposed project would conflict with any plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Environmental plans and policies are those, like the Bay Area Air Quality Management District’s 2010 Clean Air Plan, which directly address environmental issues and/or contain targets or standards that must be met in order to preserve or improve characteristics of the City’s physical environment.

The General Plan contains objectives and policies that guide land use decisions, as well as some objectives and policies that relate to physical environmental issues. As identified in **Section F, Compatibility with Zoning and Plans** (pages 19 through 26) demolition of the existing building would conflict with the policies identified in the Urban Design Element of the General Plan and the Accountable Planning Initiative. However, the proposed project would not obviously or substantially conflict with adopted environmental plans or policies which directly address environmental issues and/or contain targets or standards that must be met in order to preserve or improve characteristics of the City’s physical environment. Therefore, the proposed project would have a less-than-

significant impact with regard to conflicts with existing plans and zoning and no mitigations are necessary.

Impact C-LU-1: The proposed project would not create a considerable contribution to cumulative significant land use impacts. (*Less-Than-Significant Impact*)

Cumulative impacts refer to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts. **Section E., Cumulative Setting**, identifies the cumulative projects located within 0.25 miles of the project site. Cumulative development projects located within the vicinity of the project site would result in minor intensification of land uses in the project vicinity, similar to the proposed project; however, they are infill projects that would not physically divide an established community by constructing a physical barrier to neighborhood access, such as a new freeway, or remove a means of access, such as a bridge or roadway. In addition, the cumulative projects would not obviously or substantially conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Although these development projects would introduce new infill residential uses in the project vicinity or expand existing residential uses, these uses currently exist; therefore, the cumulative development projects would not introduce incompatible uses, such as manufacturing or industrial, that would adversely impact the existing character of the project vicinity. This cumulative development would represent an incrementally more dense urban fabric in the project vicinity but would not introduce any incompatible uses, such as industrial uses, that would have a substantial impact on the existing character of the project vicinity. Thus, the proposed project, in combination with past, present, and reasonably foreseeable future projects, would result in a less-than-significant cumulative land use impact, and no mitigation measures are necessary.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
2. POPULATION AND HOUSING— Would the project:					
a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Displace substantial numbers of existing housing units or create demand for additional housing, necessitating the construction of replacement housing?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Impact PH-1: The proposed project would not directly or indirectly induce substantial population growth in San Francisco. (*Less-Than-Significant Impact*)

In general, a project would be considered growth-inducing if its implementation would result in a substantial population increase and/or new development that might not occur if the project were not approved and implemented. The proposed project would include demolition of a former church building and construction of two four-story buildings each with two residential units, for a total of four residential units. The addition of four new residential units would increase the residential population on the site by approximately 8 persons,⁹ resulting in a direct increase in population on the project site and contributing to anticipated population growth in both the neighborhood and citywide context.

⁹ The project site is located in Census Tract 205, which is generally bounded by 17th Street to the north, 21st Street to the south, Castro Street to the east, and Douglass Street to the west. The population calculation is based on Census 2010 data, which estimates 1.82 per household in Census Tract 205. It should be noted that this census tract has somewhat smaller households than the citywide average of 2.26 persons per household.

However, the addition of 8 residents represents an incremental increase in the population of the area and would not result in a substantial increase to the population of the larger neighborhood or citywide. The 2010 U.S. Census indicates that the population in the project vicinity (Census Tract 205) is approximately 2,583 persons.¹⁰ The proposed project would increase the population near the project site by approximately 0.3 percent. The proposed project would not indirectly induce substantial population growth in the project area because it would be located on an infill site in an urbanized area and would not involve any extensions to area roads or other infrastructure that could enable additional development in currently undeveloped areas. The project would also not generate new employment on the site which could in turn indirectly increase the demand for housing elsewhere. Therefore, the proposed project would not directly or indirectly induce substantial population growth in San Francisco. This impact would be less than significant and no mitigation measures are necessary. This topic will not be addressed in the EIR.

Impact PH-2: The proposed project would not displace substantial numbers of existing housing units or people and would not create demand for additional housing elsewhere. (*Less-Than-Significant Impact*)

The project site is currently developed with a former church building, and there are no existing housing units on the project site. Therefore, implementation of the proposed project would not displace existing housing units or residents. The proposed project would result in the development of four new residential units and would not include uses that could generate demand for additional housing citywide, such as commercial space. Therefore, this impact would be less than significant and no mitigation measures are necessary. This topic will not be addressed in the EIR.

Impact C-PH-1: The proposed project, in combination with past, present, and reasonably foreseeable future projects, would not result in a cumulative impact related to population and housing. (*Less-Than-Significant Impact*)

¹⁰ The population estimate is based on data from the 2010 Census for Census Tract 205.

The past, present, and reasonably foreseeable projects within a 0.25-mile radius of the proposed project would add approximately 18 new residents within 8 new dwelling units into the project area; and would result in a total of 26 new residents and 12 new dwelling units in combination with the proposed project.¹¹ As described under Impact PH-1, the proposed project's individual contribution to population and employment growth would not be considerable and represents a minimal percentage of overall population increase within the neighborhood and Citywide. The population of San Francisco is projected to increase by approximately 280,490 persons for a total of 1,085,725 persons by 2040.¹² The residential population introduced as a result of the proposed project would constitute less than one percent of projected city-wide growth. Thus, this population increase would be accommodated within the planned growth for San Francisco. Furthermore, these additional residential units would provide more opportunities for housing, which is a Citywide need. Additionally, the proposed project, in combination with other past, present, and reasonably foreseeable future projects, would not result in the displacement of substantial numbers of housing units as the majority of the approved and proposed projects would redevelop existing vacant or underutilized buildings and sites with more intense land uses, including housing.

For these reasons, the proposed project in combination with other past, present, and reasonably foreseeable future projects would not result in a cumulatively considerable impact related to population and housing.

¹¹ Assumes the City of San Francisco average of 2.26 persons per household.

¹² Association of Bay Area Governments and Metropolitan Transportation Commission, *Plan Bay Area—Strategy for a Sustainable Region* (p. 40), July 18, 2013. Available online at files.mtc.ca.gov/pdf/Plan_Bay_Area_FINAL/Plan_Bay_Area.pdf (accessed February 20, 2017).

Topics:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Not Applicable
3. CULTURAL 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code §21074?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Impact CP-1: Implementation of the proposed project would result in the demolition of the 150 Eureka Street building, a historical resource for the purposes of CEQA. (Potentially Significant Impact)

As discussed on pages 1 through 5 of **Section A, Project Site**, the proposed project would result in the demolition of a building that previously housed the Metropolitan Community Church (MCC) of San Francisco and is considered to be individually eligible for listing on the California Register of Historic Places due to its association with the City's LGBTQ community.^{13,14} The proposed demolition of the building is a potentially significant impact because of the effect to the historical significance and integrity of this resource. Potential adverse effects to historical resources will be evaluated in the EIR.

¹³ Marcelle Boudreaux, Preservation Planner, San Francisco Planning Department, *Historic Resource Evaluation Response, 150 Eureka Street*, August 17, 2016.

¹⁴ Tim Kelley Consulting, LLC, *Part I Historical Resource Evaluation, 150 Eureka Street, San Francisco, California*, Revised May 2016.

Impact CP-2: The proposed project could result in a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5. (*Less-Than-Significant with Mitigation Incorporated*)

This section discusses archaeological resources, both as historical resources according to Section 15064.5 as well as unique archaeological resources as defined in Section 21083.2(g).

The potential for encountering archaeological resources is determined by several relevant factors including archaeological sensitivity criteria and models, local geology, site history, and the extent of a potential projects soils disturbance/modification, as well as any documented information on known archaeological resources in the area. A Planning Department archaeologist completed a preliminary archeological review (PAR) for the proposed project.¹⁵ The PAR determined that there is a low potential to adversely affect archaeological resources. The project site is underlain by Quaternary-age surficial deposits and firm to very stiff, sandy lean clay as well as firm to hard, lean clay with varying amounts of sand from the ground surface to depths of 10 feet.¹⁶ There are no documented or recorded archaeological sites in the immediate vicinity of the proposed project.

Based on the above, there is a low potential for uncovering archaeological resources during project development. While unlikely, it is possible that previously unrecorded and buried (or otherwise obscured) archaeological deposits could be discovered during ground disturbing activities. Excavating, grading, and moving heavy construction vehicles and equipment could expose and have impacts on unknown archeological resources, which would be a significant impact. However, this impact would be reduced to a less-than-significant level with implementation of **Mitigation Measure M-CP-2, Accidental Discovery of Archeological Resources**. **Mitigation Measure M-CP-2** is required to avoid any potential adverse effect from the proposed project on accidentally discovered buried or submerged historical resources as defined in CEQA Guidelines Section 15064.5(a)(c). This measure

¹⁵ Randall Dean, Archeologist, San Francisco Planning Department, *Preliminary Archeological Review, 150 Eureka Street Project*, December 9, 2016.

¹⁶ H. Allen Gruen, Geotechnical Engineer, *Geotechnical Investigation, Planned Development at 150 Eureka Street, San Francisco, California*, November 28, 2016.

requires that archaeological resources be avoided and, if accidentally discovered, that they be treated appropriately.

Mitigation Measure M-CP-2: Accidental Discovery of Archeological Resources. The project sponsor shall distribute the Planning Department archeological resource “ALERT” sheet to the project prime contractor; to any project subcontractor (including demolition, excavation, grading, foundation, etc. firms); or utilities firm involved in soils disturbing activities within the project site. Prior to any soils disturbing activities being undertaken each contractor is responsible for ensuring that the “ALERT” sheet is circulated to all field personnel including, machine operators, field crew, supervisory personnel, etc. The project sponsor shall provide the Environmental Review Officer (ERO) with a signed affidavit from the responsible parties (prime contractor, subcontractor(s), and utilities firm) to the ERO confirming that all field personnel have received copies of the Alert Sheet.

Should any indication of an archeological resource be encountered during any soils disturbing activity of the project, the project Head Foreman and/or project sponsor shall immediately notify the ERO and shall immediately suspend any soils disturbing activities in the vicinity of the discovery until the ERO has determined what additional measures should be undertaken. If the ERO determines that an archeological resource may be present within the project site, the project sponsor shall retain the services of a qualified archeological consultant, based on standards developed by the Planning Department archeologist. The archeological consultant shall advise the ERO as to whether the discovery is an archeological resource, retains sufficient integrity, and is of potential scientific/historical/cultural significance. If an archeological resource is present, the archeological consultant shall identify and evaluate the archeological resource. The archeological consultant shall make a recommendation as to what action, if any, is warranted. Based on this information, the ERO may require, if warranted, specific additional measures to be implemented by the project sponsor.

Measures might include: preservation in situ of the archeological resource; an archeological monitoring program; or an archeological testing program. If an archeological monitoring program or archeological testing program is required, it shall be consistent with the Environmental Planning (EP) division guidelines for such programs. The ERO may also require

that the project sponsor immediately implement a site security program if the archeological resource is at risk from vandalism, looting, or other damaging actions.

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

Copies of the Draft FARR shall be sent to the ERO for review and approval. Once approved by the ERO, copies of the FARR shall be distributed as follows: California Archeological Site Survey Northwest Information Center (NWIC) shall receive one (1) copy and the ERO shall receive a copy of the transmittal of the FARR to the NWIC. The Environmental Planning division of the Planning Department shall receive one bound copy, one unbound copy and one unlocked, searchable PDF copy on CD 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 Historic Places. 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.

With implementation of **Mitigation Measure M-CP-2, Accidental Discovery of Archaeological Resources**, project construction would have a less-than-significant impact on prehistoric or historical archaeological resources, and this topic will not be discussed in the EIR.

Impact CP-3: Construction activities for the proposed project could result in the disturbance of human remains, including those interred outside of formal cemeteries, should such remains exist beneath the project site. (*Less-Than-Significant with Mitigation Incorporated*)

There are no known human remains, including those interred outside of formal cemeteries, located in the immediate vicinity of the site. It is considered highly unlikely that human remains would be encountered at the project site during excavation and grading for the proposed project. However, in the unlikely event that human remains are encountered during construction, inadvertent damage to

human remains could be considered a significant impact. However, with implementation of **Mitigation Measure M-CP-3, Human Remains and Associated or Unassociated Funerary Objects**, as described below, the proposed project would have a less-than-significant impact on previously unknown human remains.

Mitigation Measure M-CP-3: Human Remains and Associated or Unassociated Funerary Objects. The treatment of human remains and of associated or unassociated funerary objects discovered during any soils disturbing activity shall comply with applicable State and Federal laws. This shall include immediate notification of the Coroner of the City and County of San Francisco and in the event of the Coroner's determination that the human remains are Native American remains, notification of the California State Native American Heritage Commission (NAHC) who shall appoint a Most Likely Descendant (MLD) (Pub. Res. Code Sec. 5097.98). The archeological consultant, project sponsor, ERO, and MLD shall have up to but not beyond six days after the discovery to make all reasonable efforts to develop an agreement for the treatment of human remains and associated or unassociated funerary objects with appropriate dignity (CEQA Guidelines. Sec. 15064.5(d)). The agreement should take into consideration the appropriate excavation, removal, recordation, analysis, custodianship, curation, and final disposition of the human remains and associated or unassociated funerary objects. Nothing in existing State regulations or in this mitigation measure compels the project sponsor and the ERO to accept recommendations of an MLD. The archeological consultant shall retain possession of any Native American human remains and associated or unassociated burial objects until completion of any scientific analyses of the human remains or objects as specified in the treatment agreement if such as agreement has been made or, otherwise, as determined by the archeological consultant and the ERO.

With implementation of **Mitigation Measure M-CP-3, Human Remains and Associated or Unassociated Funerary Objects**, project construction would have a less-than-significant impact on previously unknown human remains, and this topic will not be discussed in the EIR.

Impact CP-4: Construction activities for the proposed project could result in the disturbance of tribal resources, should such resources exist beneath the project site. (*Less-Than-Significant with Mitigation Incorporated*)

CEQA Section 21074.2 requires the lead agency to consider the effects of a project on tribal cultural resources. As defined in Section 21074, tribal cultural resources are sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are listed, or determined to be eligible for listing, on the national, State, or local register of historical resources. Based on discussions with Native American tribal representatives, in San Francisco, prehistoric archeological resources are presumed to be potential tribal cultural resources. A tribal cultural resource is adversely affected when a project causes a substantial adverse change in the resource's significance.

Pursuant to CEQA Section 21080.3.1(d), within 14 days of a determination that an application for a project is complete or a decision by a public agency to undertake a project, the Lead Agency is required to contact the Native American tribes that are culturally or traditionally affiliated with the geographic area in which the project is located. Notified tribes have 30 days to request consultation with the Lead Agency to discuss potential impacts on tribal cultural resources and measures for addressing those impacts. On February 2, 2017, the Planning Department contacted Native American individuals and organizations for the San Francisco area, providing a description of the project and requesting comments on the identification, presence and significance of tribal cultural resources in the project vicinity.

During the 30-day comment period, no Native American tribal representatives contacted the Planning Department to request consultation. As discussed under Impact CP-2 and Impact CP-3, **Mitigation Measure M-CP-2, Accidental Discovery of Archeological Resources**, and **Mitigation Measure M-CP-3, Human Remains and Associated or Unassociated Funerary Objects**, would be applicable to the proposed project. Unknown archeological resources or burial sites may be encountered during construction that could be identified as tribal cultural resources at the time of discovery or at a later date. Therefore, the potential adverse effects of the proposed project on previously unidentified archeological resources, discussed under Impact CP-2, also represent a potentially significant impact to tribal cultural resources. Implementation of **Mitigation Measure M-CP-4, Tribal Cultural Resources Interpretive Program**, would reduce potential adverse effects on tribal cultural resources to a less-than-significant level. **Mitigation Measure M-CP-4** would require either preservation-in-place of the tribal cultural resources, if determined effective and feasible, or an

interpretive program regarding the tribal cultural resources developed in consultation with affiliated Native American tribal representatives.

Mitigation Measure M-CP-4: Tribal Cultural Resources Interpretive Program

If the ERO determines that a significant archeological resource is present, and if in consultation with the affiliated Native American tribal representatives, the ERO determines that the resource constitutes a tribal cultural resource (TCR) and that the resource could be adversely affected by the proposed project, the proposed project shall be redesigned so as to avoid any adverse effect on the significant tribal cultural resource, if feasible.

If the ERO, in consultation with the affiliated Native American tribal representatives and the project sponsor, determines that preservation-in-place of the tribal cultural resources is not a sufficient or feasible option, the project sponsor shall implement an interpretive program of the TCR in consultation with affiliated tribal representatives. An interpretive plan produced in consultation with the ERO and affiliated tribal representatives, at a minimum, and approved by the ERO would be required to guide the interpretive program. The plan shall identify, as appropriate, proposed locations for installations or displays, the proposed content and materials of those displays or installation, the producers or artists of the displays or installation, and a long-term maintenance program. The interpretive program may include artist installations, preferably by local Native American artists, oral histories with local Native Americans, artifacts displays and interpretation, and educational panels or other informational displays.

In the event that construction activities disturb unknown archeological sites that are considered tribal cultural resources, any inadvertent damage would be considered a significant impact. With implementation of **Mitigation Measures M-CP-2, M-CP-3, and M-CP-4**, as described above, the proposed project would have a less-than-significant impact on previously unknown tribal cultural resources. Therefore, this topic will not be discussed in the EIR.

Impact C-CP-1: The proposed project, in combination with past, present, and reasonably foreseeable future projects in the vicinity could result in cumulative impacts to historic architectural resources. (Potentially Significant Impact)

The proposed project would result in the demolition of a potentially significant historic resource associated with the City's LGBTQ community. When considered with past, present, and reasonably foreseeable future projects in the vicinity of the project site, the proposed demolition could result in a cumulatively considerable contribution to historic resource impacts. This topic will be addressed in the EIR.

Impact C-CP-2: The proposed project, in combination with past, present, and reasonably foreseeable future projects in the vicinity could result in a substantial adverse change in the significance of previously undiscovered archaeological resources, human remains, including those interred outside of formal cemeteries; and tribal resources should such resources exist on or beneath the project site. (*Less-Than-Significant with Mitigation Incorporated*)

Archeological resources and tribal cultural resources are non-renewable and finite, and all adverse effects to subsurface archeological resources and tribal cultural resources have the potential to erode a dwindling cultural/scientific resource base. Past, present, and reasonably foreseeable future development projects within San Francisco and the Bay Area region would include construction activities that could disturb archaeological resources and tribal cultural resources and could contribute to cumulative impacts related to the loss of significant historical, scientific, and cultural information about California, Bay Area, and San Francisco history and prehistory including the historic and prehistory of Native American peoples. Similar to the proposed project, development projects within San Francisco would be subject to the City's standard archeological and human remains mitigation measures, thereby reducing the potential for cumulative archeological-related and tribal-cultural-resource-related impacts.

As discussed above under **Mitigation Measure M-CP-2**, implementation of approved plans for the recovery, documentation, and interpretation of information about archaeological resources that may be encountered within the project site would enhance knowledge of prehistory and history. Furthermore, implementation of **Mitigation Measure M-CP-3** would ensure that if human remains are encountered, the information potential of that potential resource would be preserved and realized. This information would be available to future archaeological studies, contributing to the collective body of scientific and historical knowledge. Implementation of **Mitigation Measure M-CP-4** would afford the same protections to tribal cultural resources in the case of accidental discovery and contribute to the preservation of important historic, scientific, and cultural knowledge related to

Native America peoples. Since adverse effects to subsurface archeological resources, human remains, and tribal cultural resources are site specific and standard mitigation would be imposed on future projects, with implementation of **Mitigation Measures M-CP-2, M-CP-3, and M-CP-4**, the proposed project's contribution to cumulative impacts would not be cumulatively considerable. Therefore, this impact would be less than significant, and these topics will not be discussed in the EIR.

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

The proposed project would not result in a change in air traffic patterns, and would therefore not cause substantial air traffic safety risks. Therefore, topic 4c is not applicable to the project.

Setting

Site Circulation, Access, and Parking

The project site is located in San Francisco's Castro/Upper Market neighborhood and is located within a developed City block bounded by 18th Street to the north, Eureka Street to the east, 19th Street to the south, and Douglass Street to the west. The site is located on the west side of Eureka Street, at 150 Eureka Street.

Regional vehicular access to the project site is provided by I-280 to the east, Interstate 80 (I-80) to the north and U.S. Highway 101 (U.S. 101) to the west. Local streets in the vicinity of the site connect to I-280 and U.S. 101. Local access to the project site is currently provided by Eureka Street.

The project vicinity is served by public transit, with local transit service within walking distance and regional transit available 0.6 to 1.0 mile from the site. Local service is provided by Muni bus and light rail under the direction of the SFMTA. Muni provides transit service within the City and County of San Francisco. Service options include bus (both diesel motor coach and electric trolley), light rail (Muni Metro), cable car, and electric streetcar lines.

Regional service to the East Bay and south of San Francisco is provided by Bay Area Rapid Transit (BART). The project site is located approximately 1.2 miles to the west of the 16th Street Mission BART station. Service to and from the South Bay/Peninsula is provided by the Peninsula Corridor Joint Powers Board via Caltrain with the nearest station, the 24th Street Mission Station, located approximately 1.6 miles southeast of the project site. In addition, the Alameda-Contra Costa County Transit District (AC Transit) and the Golden Gate Bridge Highway and Transportation District (Golden Gate Transit) provide bus service to the East Bay and North Bay, respectively. These services are generally routed through the Transbay Terminal, located approximately 3 miles north of the site, and the nearest stops are located about 4.3 miles northeast of the site.

Bikeways are classified as Class I, Class II, or Class III facilities.¹⁷ Class I bicycle facilities provide a completely separated right-of-way for the exclusive use of bicycles and pedestrians with cross flow by motorists minimized. Class II bicycle facilities provide a striped lane on a street or highway. Class III bicycle facilities are signed bike routes that provide for shared use with motor vehicle traffic.¹⁸ Class III bicycle facilities are signed routes with no bike lane striping but may include other striping such as “sharrows” that allow bicyclists to share the roadway with vehicles. According to the San Francisco Bike Network Map, there are several bicycle routes in the vicinity of the project site. Along Eureka Street, there is a Class III bicycle route.¹⁹

Background on Vehicle Miles Traveled (VMT) in San Francisco and Bay Area

In January 2016, OPR published for public review and comment a Revised Proposal on Updates to CEQA Guidelines on Evaluating Transportation Impacts in CEQA²⁰ (proposed transportation impact guidelines) recommending that transportation impacts for projects be measured using a VMT metric. VMT measures the amount and distance that a project might cause people to drive, accounting for the number of passengers within a vehicle. OPR’s proposed transportation impact guidelines provides substantial evidence that VMT is an appropriate standard to use in analyzing transportation impacts to protect environmental quality and a better indicator of greenhouse gas, air quality, and energy impacts than automobile delay. Acknowledging this, San Francisco Planning Commission Resolution 19579, adopted on March 3, 2016:

¹⁷ Bicycle facilities are defined by the State of California in the California Streets and Highway Code, Section 890.4.

¹⁸ California Department of Transportation, *Highway Design Manual – Chapter 1000 Bikeway Planning and Design*, June 26, 2006.

¹⁹ San Francisco Municipal Transportation Agency, *San Francisco Bike Network Map*. This document is available for review at www.sfmta.com/maps/san-francisco-bike-network-map.

²⁰ California Governor’s Office of Planning & Research, “Updating the Analysis of Transportation Impacts Under CEQA.” Available online at: www.opr.ca.gov/s_sb743.php (accessed February 20, 2017).

- Found that automobile delay, as described solely by LOS or similar measures of vehicular capacity or traffic congestion, shall no longer be considered a significant impact on the environment pursuant to CEQA, because it does not measure environmental impacts and therefore it does not protect environmental quality.
- Directed the Environmental Review Officer to remove automobile delay as a factor in determining significant impacts pursuant to CEQA for all guidelines, criteria, and list of exemptions, and to update the Transportation Impact Analysis Guidelines for Environmental Review and Categorical Exemptions from CEQA to reflect this change.
- Directed the Environmental Planning Division and Environmental Review Officer to replace automobile delay with VMT criteria which promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses; and consistent with proposed and forthcoming changes to CEQA Guidelines by OPR.

Planning Commission Resolution 19579 became effective immediately for all projects that have not received a CEQA determination and all projects that have previously received CEQA determinations, but require additional environmental 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 vehicle miles traveled (VMT) ratio than the nine-county San Francisco Bay Area region. In addition, some areas of the City have lower VMT ratios than other areas of the City. These areas of the City can be expressed geographically through transportation analysis zones (TAZs). TAZs are used in transportation planning models for transportation analysis and other planning purposes. The zones vary in size from single city blocks in

the downtown core, multiple blocks in outer neighborhoods, to even larger zones in historically industrial areas like the Hunters Point Shipyard.

The San Francisco County Transportation Authority (Transportation Authority) uses the San Francisco Chained Activity Model Process (SF-CHAMP) to estimate VMT by private automobiles and taxis for different land use types. Travel behavior in SF-CHAMP is calibrated based on observed behavior from the California Household Travel Survey 2010-2012, Census data regarding automobile ownership rates and county-to-county worker flows, 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 an 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.^{21,22}

Impact TR-1: The proposed project would not 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. (Less-Than-Significant Impact)

²¹ 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.

²² San Francisco Planning Department, *Executive Summary: Resolution Modifying Transportation Impact Analysis, Appendix F, Attachment A*, March 3, 2016.

VMT Analysis

Land use projects may cause substantial additional VMT. The following identifies thresholds of significance and screening criteria used to determine if a residential land use project would result in significant impacts under the VMT metric.

For residential projects, a project would generate substantial additional VMT if it exceeds the regional household VMT per capita minus 15 percent.²³ As documented in the *Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA* (“proposed transportation impact guidelines”), a 15 percent threshold below existing development is “both reasonably ambitious and generally achievable.”²⁴

OPR’s proposed transportation impact guidelines provides screening criteria to identify types, characteristics, or locations of land use projects that would not exceed these VMT thresholds of significance. OPR recommends that if a project or land use proposed as part of the project meets any of the below screening criteria, then VMT impacts are presumed to be less than significant for that land use and a detailed VMT analysis is not required. These screening criteria and how they are applied in San Francisco are described below:

- Map-Based Screening for Residential, Office, and Retail Projects. OPR recommends mapping areas that exhibit where VMT is less than the applicable threshold for that land use. Accordingly, the Transportation Authority has developed maps depicting existing VMT levels in San Francisco for residential, office, and retail land uses based on the SF-CHAMP 2012 base-year model run. The Planning Department uses these maps and

²³ OPR’s proposed transportation impact guidelines state a project would cause substantial additional VMT if it exceeds both the existing City household VMT per capita minus 15 percent and existing regional household VMT per capita minus 15 percent. In San Francisco, the City’s average VMT per capita is lower (8.4) than the regional average (17.2). Therefore, the City average is irrelevant for the purposes of the analysis.

²⁴ Governor’s Office of Planning and Research, *Revised Proposal on Updates to CEQA Guidelines on Evaluating Transportation Impacts in CEQA*, January 20, 2016, p. III:20. This document is available online at: https://www.opr.ca.gov/s_sb743.php.

associated data to determine whether a proposed project is located in an area of the City that is below the VMT threshold.

- Small Projects – OPR recommends that lead agencies may generally assume that a project would not have significant VMT impacts if the project would either: (1) generate fewer trips than the level required for studying consistency with the applicable congestion management program or (2) where the applicable congestion management program does not provide such a level, fewer than 100 vehicle trips per day. The Transportation Authority's 2015 San Francisco Congestion Management Program does not include a trip threshold for studying consistency. Therefore, the Planning Department uses the 100 vehicle trip per day screening criterion as a level generally where projects would not generate a substantial increase in VMT.
- Proximity to Transit Stations. OPR recommends that residential, retail, and office projects, as well projects that are a mix of these uses, proposed within 0.5 miles of an existing major transit stop (as defined by CEQA Section 21064.3) or an existing stop along a high quality transit corridor (as defined by CEQA Section 21155) would not result in a substantial increase in VMT. However, this presumption would not apply if the project would: (1) have a floor area ratio²⁵ of less than 0.75; (2) include more parking for use by residents, customers, or employees of the project than required or allowed, without a conditional use; or (3) is inconsistent with the applicable Sustainable Communities Strategy.²⁶

The existing average daily VMT per capita for the transportation analysis zone the project site is located in, TAZ 190, is below the existing regional average daily VMT.

- For residential uses, the average daily VMT per capita is 8.5, which is about 51 percent below the existing regional average daily VMT per capita of 17.2.

²⁵ Floor area ratio means the ratio of gross building area of the development, excluding structured parking areas, proposed for the project divided by the net lot area.

²⁶ A project is considered to be inconsistent with the Sustainable Communities Strategy if development is located outside of areas contemplated for development in the Sustainable Communities Strategy.

Thus, as described above, the project site is located within an area of the City where the existing VMT is more than 15 percent below the regional VMT, and the proposed project land uses would not generate substantial additional VMT.²⁷ Furthermore, the project site meets the Proximity to Transit Stations screening criterion, which also indicates the proposed project's uses would not cause substantial additional VMT.²⁸

Trip Generation

The proposed project would construct two four-story buildings with a total of four residential units. Trip generation rates from the Institute of Transportation Engineers (ITE) Trip Generation Manual, 9th Edition, were used to estimate the daily and peak hour trip generation for the proposed project. Table 2 below summarizes the trip generation for the proposed project.

Table 2: Project Trip Generation

Land Use	Units	Daily Trips	AM Peak Hour			PM Peak Hour		
			Total	In	Out	Total	In	Out
Residential Condominium	4	24	2	0	2	2	1	1

Notes: Rates per ITE *Trip Generation Manual*, 9th Edition; Land Use Code (230) Residential Condominium/Townhouse

Source: LSA Associates Inc., 2016.

As shown in Table 2 above, the proposed project is expected to generate approximately 24 daily vehicle trips, with 2 trips occurring during the AM peak hour and 2 trips occurring during the PM peak hour.

²⁷ The Map-Based Screening for Residential, Office, and Retail Projects was applied to the proposed project. The project site is located within TAZ 711, which is within an area of the City where the existing VMT is more than 15 percent below the regional VMT thresholds, as documented in Executive Summary Resolution Modifying Transportation Impact Analysis, Attachment F (Methodologies, Significance Criteria, Thresholds of Significance, and Screening Criteria for Vehicle Miles Traveled and Induced Automobile Travel Impacts), Appendix A (SFCTA Memo), March 3, 2016. Available online at: commissions.sfplanning.org/cpcpackets/Align-CPC%20exec%20summary_20160303_Final.pdf (accessed March 21, 2016).

²⁸ San Francisco Planning Department, Transportation Study Determination Request Case No. 2015-011274ENV, 150 Eureka Street, 415.558.6378, October 25, 2016.

Construction

Construction of the proposed project would be expected to take approximately 18 months. During this period, temporary and intermittent transportation impacts would result from truck movements to and from the project site during excavation and construction activities associated with the proposed buildings. Construction activities would generate construction worker trips to and from the project site and a temporary demand for parking and public transit. However, the additional trips would not exceed the capacity of local or regional transit service. Due to the temporary nature of the construction activities, the construction related impacts on transportation and circulation would be less than significant.

Due to the limited addition of project-related traffic (2 PM peak hour trips), the proposed project is not anticipated to result in a conflict with any established plans or policies related to transportation and circulation. In addition, as discussed above, the proposed project would meet the VMT Map screening criteria. Implementation of the proposed project would result in less-than-significant construction-related impacts. Therefore, the proposed project would not conflict with any plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system or congestion management program. This impact would be less than significant and no mitigation measures would be required. This topic will not be addressed in the EIR.

Impact TR-2: The proposed project would not result in substantially increased hazards due to particular design features (e.g., sharp curves or dangerous intersections) or incompatible uses. (*Less-Than-Significant Impact*)

The proposed project would include the construction of two four-story buildings with a total of four residential units, which is considered a compatible use with the surrounding area. Access to the project site would be provided by Eureka Street, via two new 10-foot-wide project driveways. The proposed project would not result in roadway design changes and, therefore, Eureka Street would remain mostly unchanged from existing conditions. Therefore, the proposed project would not include sharp curves or other roadway design elements would create dangerous conditions. The proposed project would result in a less-than-significant impact related to hazards associated with a design feature and no mitigation is required. This topic will not be addressed in the EIR.

Impact TR-3: The proposed project would not result in inadequate emergency access. (*Less-Than-Significant Impact*)

Emergency access to the project site would remain mostly unchanged from existing conditions. Emergency service providers would continue to access the project site, as well as adjacent buildings, via Eureka Street. In addition, as discussed above, the proposed project would not include roadway design changes. For these reasons the proposed project would not inhibit emergency vehicle access to the project site and nearby vicinity. Therefore, the proposed project's impacts related to emergency vehicle access would be less than significant and no mitigation measures would be required. This topic will not be addressed in the EIR.

Impact TR-4: The proposed project would not conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities, or cause a substantial increase in transit demand which cannot be accommodated by existing or proposed transit capacity or alternative travel modes. (*Less-Than-Significant Impact*)

Implementation of the proposed project would add four residential units to the project site, increasing the residential population on the site by approximately eight persons.²⁹ The proposed project would not substantially increase the population in the project vicinity and would result in a minimal number of transit trips, pedestrian, and bicycle trips. Thus, the proposed project would not substantially effect the utilization of local and regional transit service, pedestrian facilities, or bicycle facilities. Therefore, the proposed project would not result in changes to the City's transportation and circulation system that could conflict with adopted policies, plans, or programs regarding transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities, or cause a substantial increase in transit demand which cannot be accommodated by existing or proposed transit capacity or alternative travel modes. Therefore, this impact would be less than significant and no mitigation measures would be required. This topic will not be discussed in the EIR.

²⁹ The population estimate is based on Census 2010 data, which estimates 1.82 per household in Census Tract 205.

Impact C-TR-1: The proposed project, in combination with past, present, and reasonably foreseeable future projects, would not result in substantial cumulative transportation impacts. (Less-Than-Significant Impact)

As discussed above under Impacts TR-1, TR-2, TR-3, and TR-4, the proposed project would result in less-than-significant impacts on traffic, emergency access, transit, pedestrians, and bicycles. While construction the proposed project could occur concurrently with construction of cumulative development projects in the vicinity, the cumulative impacts of multiple nearby construction projects would not be cumulatively considerable, as the construction would be of temporary duration, and the project sponsor would be required to coordinate with various City departments such as SFMTA and SFPW.

Based on the foregoing, in combination with past, present, and reasonably foreseeable future projects, the proposed project would not contribute considerably to any substantial cumulative increase in VMT, impacts to the effectiveness of the circulation system, impacts related to design features or incompatible uses, inadequate emergency access, or conflicts with alternative modes of transportation. Therefore, this impact would be less than significant and no mitigation measures would be required. This topic will not be discussed in the EIR.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
5. NOISE— Would the project:					
a) Result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input 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 type="checkbox"/>	<input checked="" type="checkbox"/>
f) For a project located in the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Be substantially affected by existing noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The project site is not within an airport land use plan area or in the vicinity of a private airstrip. Therefore, topics 5e and 5f are not applicable and will not be further discussed.

Fundamentals of Environmental Noise and Groundborne Vibration

A project will normally have a significant effect on the environment related to noise if it would substantially increase the ambient noise levels for adjoining areas or conflict with the adopted environmental plans and goals of the community in which it is located. Noise impacts can be described in three categories. The first is audible impacts that increase noise levels noticeable to humans. Audible increases in noise levels generally refer to a change of 3.0 decibels (dB) or greater since this level has been found to be barely perceptible in exterior environments. The second category, potentially audible, is the change in the noise level between 1.0 and 3.0 dB. This range of noise levels has been found to be noticeable only in laboratory environments. The last category is changes in noise level of less than 1.0 dB, which are inaudible to the human ear. Only audible changes in existing ambient or background noise levels are considered potentially significant. For the purpose of this analysis, the proposed project would result in a significant noise impact if implementation of the proposed project would result in ambient existing noise levels increasing to a

level greater than 3 dB and the resulting noise level is greater than the standards cited below or if the project-related increase in noise is greater than 5 A-weighted decibels (dBA), yet the resulting noise levels are within the applicable land use compatibility standards for the sensitive use.³⁰

The primary existing noise sources contributing to ambient noise in the project area are traffic associated with Eureka Street, 18th Street, and 19th Street and other noise from motor vehicles generated by engine vibrations, the interaction between the tires and the road, and vehicle exhaust systems.

Vibration is an oscillatory motion through a solid medium in which the motion's amplitude can be described in terms of displacement, velocity, or acceleration. Several different methods are used to quantify vibration. The most frequently used method to describe vibration impacts on buildings is peak particle velocity (PPV). PPV is defined as the maximum instantaneous peak of the vibration signal in inches per second (in/sec). The most frequently used method to describe the effect of vibration on the human body is the root mean square (RMS) amplitude. The RMS amplitude is defined as the average of the squared amplitude of the signal. Decibel notation (VdB) is commonly used to measure RMS.³¹ The decibel notation acts to compress the range of numbers required to describe vibration. The criteria for environmental impact from groundborne vibration and noise are based on the maximum RMS vibration levels for repeated events of the same source.³²

Typically, groundborne vibration generated by man-made activities attenuates rapidly with distance from the source of the vibration. The effects of groundborne vibration include movement of building

³⁰ A-Weighted Sound Level (dBA) is the sound level obtained by use of A-weighting. The A-weighting filter de-emphasizes the very low and very high frequency components of the sound in a manner similar to the frequency response of the human ear and correlates well with subjective reactions to noise. All sound levels in this section are A-weighted, unless reported otherwise.

³¹ Vibration velocity level is reported in decibels relative to a level of 1×10^{-6} inches per second and is denoted as VdB.

³² Federal Transit Administration, *Transit Noise and Vibration Impact Assessment*, May 2006, pp. 8-1 to 8-3, Table 8-1. Available online at www.transit.dot.gov/sites/fta.dot.gov/files/docs/FTA_Noise_and_Vibration_Manual.pdf (accessed February 7, 2017).

floors, rattling of windows, shaking of items on shelves or hanging on walls, and rumbling sounds. The rumbling sound caused by the vibration of room surfaces is called groundborne noise, which can occur as a result of the low-frequency components from a specific steady source of vibration, such as a rail line. Receptors sensitive to vibration include structures (especially older masonry structures), people (especially residents, the elderly, and sick), and vibration-sensitive equipment. Fragile buildings and underground facilities, in particular those that are considered historic, are included because groundborne vibration can result in structural damage. In extreme cases, high levels of vibration can damage fragile buildings or interfere with sensitive equipment. With the exception of long-term occupational exposure, vibration levels rarely affect human health. Instead, most people consider vibration to be an annoyance that can affect concentration or disturb sleep. People may tolerate infrequent, short duration vibration levels, but human annoyance to vibration becomes more pronounced if the vibration is continuous or occurs frequently. A vibration level that causes annoyance will be well below the damage threshold for normal buildings. Annoyance generally occurs in reaction to newly introduced sources of noise that interrupt ongoing activities. Community annoyance is a summary measure of the general adverse reaction of people to noise that causes speech interference, sleep disturbance, or interference with the desire for a tranquil environment.³³ People react to the duration of noise events, judging longer events to be more annoying than shorter ones, and transportation noise is usually a primary cause of community dissatisfaction. Construction noise or vibration also often generates complaints, especially during lengthy periods of heavy construction, when nighttime construction is undertaken to avoid disrupting workday activity, or when the adjacent community has no clear understanding of the extent or duration of the construction.³⁴

The City does not have regulations that define acceptable levels of vibration. Therefore, this document references a Federal Transit Administration (FTA) publication concerning noise and vibration impact assessment from transit activities for informational purposes.³⁵ Although the FTA

³³ Ibid, pp. 2-13 to 2-17

³⁴ Ibid. p. 12-1.

³⁵ Ibid.

guidelines are intended to apply to transit operations, the guidelines may be reasonably applied to the assessment of the potential for annoyance or structural damage to other facilities and “fragile” buildings resulting from other activities. The FTA guidelines do not define what constitutes a “fragile” building other than to state that many fragile buildings are old.

Noise Compatibility

San Francisco addresses noise policies in the General Plan’s Environmental Protection Element.³⁶ This element includes a Transportation Noise section that provides general guidance for reducing transportation noise through “sound land use planning and transportation planning.” It also states: “in a fully developed city, such as San Francisco, where land use and circulation patterns are by and large fixed, the ability to reduce the noise impact through a proper relationship of land use and transportation facility location is limited.”³⁷

The General Plan focuses on the effect of noise on the community due to ground transportation noise sources and establishes the “Land Use Compatibility Chart for Community Noise” for determining when noise reduction requirements should be analyzed, such as providing sound insulation for affected properties. The standards in the land use compatibility standards for community noise determine the maximum acceptable noise environment for each newly developed land use, and are shown in Table 3. Although Table 3 presents a range of noise levels that are considered compatible or incompatible with various land uses, the maximum “satisfactory” noise level is 60 dBA L_{dn} for residential and hotel uses; 65 dBA L_{dn} for schools, classrooms, libraries, churches and hospitals; 70 dBA L_{dn} for playgrounds, parks, offices, retail commercial uses, and noise-sensitive manufacturing/communication uses; and 77 dBA L_{dn} for other commercial uses such as wholesale, certain retail, industrial/manufacturing, transportation, communications, and utilities uses.³⁸ If these uses are

³⁶ City and County of San Francisco, *City of San Francisco General Plan*, December 2, 2004. This document is available for review at www.sf-planning.org/ftp/general_plan/index.htm.





³⁷ Ibid.

³⁸ Day/Night Noise Level (L_{dn}) is the 24-hour A-weighted average sound level from midnight to midnight, obtained after the addition of 10 decibels to sound levels occurring in the night between 10:00 p.m. and 7:00 a.m. (defined as sleeping hours).

proposed to be located in areas with noise levels that exceed these guidelines, a detailed analysis of noise reduction requirements will typically be necessary prior to final building review and approval.

Table 3: Land Use Compatibility Chart for Community Noise, dBA

LAND USE CATEGORY	Sound Levels and Land Use Consequences (see explanation below)					
	L _{dn} Value in Decibels					
	55	60	65	70	75	80
Residential - All Dwellings, Group Quarters						
Transient Lodging - Motels, Hotels						
School Classrooms, Libraries, Churches, Hospitals, Nursing Homes, etc.						
Auditoriums, Concert Halls, Amphitheaters, Music Shells						
Sports Arenas, Outdoor Spectator Sports						
Playgrounds, Parks						
Golf Courses, Riding Stables, Water-based Recreation Areas, Cemeteries						
Office Buildings - Personal, Business and Professional Services						
Commercial - Retail, Movie Theatres, Restaurants						
Commercial - Wholesale and some Retail, Industrial/Manufacturing, Transportation, Communications and Utilities						
Noise Sensitive Manufacturing and Communications						

 Specified land use is satisfactory, based upon the assumption that any buildings involved are of conventional construction, without any special noise insulation requirements.
  New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is performed and needed noise insulation features included in the design.
  New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be performed and needed noise insulation features included in the design.
  New construction or development clearly generally should not be undertaken.

Source: City and County of San Francisco, City of San Francisco General Plan, December 2, 2004. This document is available for review at: www.sf-planning.org/ftp/general_plan/index.htm.

Overall, the General Plan recognizes that transportation noise remains a problem and provides guidance to manage incompatible transportation noise levels through various transportation noise-related policies. The City's background noise levels map identifies the project site to be exposed to traffic noise levels between 65 and 70 dBA L_{dn}.³⁹ According to the City's General Plan, new development should incorporate noise insulation features if the noise levels exceed the sound level guidelines shown in the land use compatibility chart.

Noise Regulations

California Code of Regulations

The State of California has established regulations that help prevent adverse impacts to occupants of buildings located near noise sources. The State Noise Insulation Standard requires buildings to meet performance standards through design and/or installation of building materials that would offset, as necessary, any noise source in the vicinity of the receptor. State regulations include requirements for the construction of new hotels, motels, apartment houses, and dwellings other than detached single-family dwellings that are intended to limit the extent of noise transmitted into habitable spaces. These requirements are found in the California Code of Regulations, Title 24 (known as the Building Standards Administrative Code), Part 2 (known as the California Building Code), Appendix Chapters 12 and 12A. For limiting noise transmitted between adjacent dwelling units, the noise insulation standards specify the extent to which walls, doors, and floor ceiling assemblies must block or absorb sound. For limiting noise from exterior noise sources, the noise insulation standards set an interior standard of 45 dBA L_{dn} in any habitable room with all doors and windows closed. In addition, the standards require preparation of an acoustical analysis demonstrating the manner in which dwelling units have been designed to meet this interior standard, where such units are proposed in an area with exterior noise levels greater than 60 dBA L_{dn}.

³⁹ City and County of San Francisco, *Areas Potentially Requiring Noise Insulations*, March 2009. This document is available for review at: default.sfplanning.org/publications_reports/library_of_cartography/Noise.pdf.

San Francisco Noise Ordinance

The San Francisco Noise Ordinance (Noise Ordinance) regulates both construction noise and stationary-source noise within the City, including noise from transportation, construction, mechanical equipment, entertainment, and human or animal behavior. Found in Article 29, “Regulation of Noise,” of the San Francisco Police Code, the Noise Ordinance addresses noise from construction equipment, nighttime construction work, and noise from stationary mechanical equipment and waste processing activities.⁴⁰ The following regulations are applicable to the proposed project.

Section 2907, Construction Equipment, and Section 2908, Construction Work at Night

Section 2907(a) requires that construction work be conducted in the following manner: (1) noise levels of construction equipment, other than impact tools, must not exceed 80 dBA at a distance of 100 feet from the source (the equipment generating the noise); (2) impact tools must have intake and exhaust mufflers that are approved by the Director of San Francisco Public Works 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 DPW authorizes a special permit for conducting the work during that period.

Section 2909, Noise Limits

This section of the Noise Ordinance regulates noise from mechanical equipment and other similar sources. (As stated in the ordinance, “No person shall produce or allow to be produced by any machine, or device, music or entertainment, or any combination of same ...”) This would include all equipment, such as electrical equipment (transformers, emergency generators) as well as mechanical equipment that is installed on commercial/industrial and residential properties. Mechanical equipment operating on commercial or industrial property must not produce a noise level more than 8 dBA above the ambient noise level at the property plane. Equipment operating on residential

⁴⁰ City and County of San Francisco, *Article 29 of the San Francisco Police Code, Regulation of Noise*, 2012. This document is available for review at: [www.amlegal.com/nxt/gateway.dll/California/police/article29regulationofnoise?f=templates\\$fn=default.htm\\$3.0\\$vid=amlegal:sanfrancisco_ca](http://www.amlegal.com/nxt/gateway.dll/California/police/article29regulationofnoise?f=templates$fn=default.htm$3.0$vid=amlegal:sanfrancisco_ca).

property must not produce a noise level more than 5 dBA above the ambient noise level at the property boundary. Section 2909 also states in subsection (d) that no fixed (permanent) noise source (as defined by the Noise Ordinance) may cause the noise level inside any sleeping or living room in a dwelling unit on residential property to exceed 45 dBA between 10:00 p.m. and 7:00 a.m. or 55 dBA between 7:00 a.m. and 10:00 p.m. when windows are open, except where building ventilation is achieved through mechanical systems that allow windows to remain closed.

Existing Sensitive Receptors

Certain land uses are considered more sensitive to noise than others. Examples of these include residential areas, educational facilities, hospitals, childcare facilities, and senior housing. The project site occupies a parcel located midblock between 18th and 19th Streets. Existing uses within the same block consist primarily of two- to three-story medium-density residential uses. Three-story residential uses border the site to the north and west and a two-story residential building borders the site to the south.

Impact NO-1: The proposed project would not result in exposure of persons to or generation of noise levels in excess of standards established in San Francisco's Noise Ordinance, nor would the proposed project result in a substantial permanent increase in ambient noise levels above levels existing without the project. (*Less-Than-Significant Impact*)

As discussed above in **Section H.4, Transportation and Circulation**, the increase in traffic associated with the proposed project would be minimal. An estimated 2 PM peak hour trips would be generated by the project. As such, project-related increases in traffic noise levels are also anticipated to be minimal along Eureka Street, 18th Street, and 19th Street and would not be perceptible by the human ear. Therefore, project-related traffic noise on off-site land uses would be less than significant, and no mitigation would be required.

In addition to generating minimal traffic-related noise, the proposed project is also anticipated to result in less than significant noise levels associated with operation. The proposed project would include four residential units, which are not typically associated with high levels of operational noise. In addition, the proposed project would be required to comply with the San Francisco Noise Ordinance restricting equipment operating on residential property from generating noise greater

than 5 dBA above the ambient noise level at the property boundary. Therefore, project-related operational noise impacts would be less than significant, and no mitigation would be required. This topic will not be addressed in the EIR.

Impact NO-2: Project demolition and construction would result in a temporary and periodic increase in ambient noise levels in the project vicinity above existing conditions. (*Less-Than-Significant with Mitigation Incorporated*)

Short-term noise impacts would occur during demolition, grading and site preparation activities. Table 4 lists maximum noise levels recommended for noise impact assessments for typical construction equipment, based on a distance of 50 feet between the equipment and a noise receptor. Construction-related short-term noise levels would be higher than existing ambient noise levels currently in the project area but would cease once construction of the project is completed.

Table 4: Typical Construction Equipment Maximum Noise Levels, L_{max}

Type of Equipment	Range of Maximum Sound Levels (dBA at 50 feet)	Suggested Maximum Sound Levels for Analysis (dBA at 50 feet)
Pile Drivers	81 to 96	93
Rock Drills	83 to 99	96
Jackhammers	75 to 85	82
Pneumatic Tools	78 to 88	85
Pumps	74 to 84	80
Scrapers	83 to 91	87
Haul Trucks	83 to 94	88
Cranes	79 to 86	82
Portable Generators	71 to 87	80
Rollers	75 to 82	80
Dozers	77 to 90	85
Tractors	77 to 82	80
Front-End Loaders	77 to 90	86
Hydraulic Backhoe	81 to 90	86
Hydraulic Excavators	81 to 90	86
Graders	79 to 89	86
Air Compressors	76 to 89	86
Trucks	81 to 87	86

Source: Bolt, Beranek & Newman, 1987. *Noise Control for Buildings and Manufacturing Plants*.

Two types of short-term noise impacts could occur during construction of the proposed project. The first type involves construction crew commutes and the transport of construction equipment and materials to the site for the proposed project, which would incrementally increase noise levels on roads leading to the site. As shown in Table 4, there would be a relatively high single-event noise exposure potential at a maximum level of 87 dBA L_{max} with trucks passing at 50 feet.

The second type of short-term noise impact is related to noise generated during excavation, grading, and construction on the project site. Construction is performed in discrete steps, or phases, each with its own mix of equipment and, consequently, its own noise characteristics. These various sequential phases would change the character of the noise generated on the site. Therefore, the noise levels vary as construction progresses. Despite the variety in the type and size of construction equipment, similarities in the dominant noise sources and patterns of operation allow construction-related noise ranges to be categorized by work phase.

Table 4 lists maximum noise levels recommended for noise impact assessments for typical construction equipment, based on a distance of 50 feet between the equipment and a noise receptor. Typical maximum noise levels range up to 96 dBA L_{max} at 50 feet during the noisiest construction phases. The site preparation phase, including excavation and grading of the site, tends to generate the highest noise levels because earthmoving machinery is the noisiest construction equipment. Earthmoving equipment includes excavating machinery such as backfillers, bulldozers, draglines, and front loaders. Earthmoving and compacting equipment includes compactors, scrapers, and graders. Typical operating cycles for these types of construction equipment may involve 1 or 2 minutes of full-power operation followed by 3 or 4 minutes at lower power settings. Project construction is expected to require the use of excavation and earthmoving machinery, as well as jackhammers and the like. No pile driving is proposed.

Sensitive receptors are located immediately adjacent to the proposed project at 138 Eureka Street and 152 Eureka Street. The closest off-site residences may be subject to short-term construction noise exceeding 100 dBA L_{max} when construction is occurring at the project site. This noise level could result in an exceedance of the City's allowable construction noise levels from construction equipment,

as specified under the Noise Ordinance as 80 dBA L_{max} at 100 feet (equivalent to 86 dBA L_{max} at 50 feet).

As discussed above, construction noise would result in a temporary or periodic increase in existing ambient noise levels in the project vicinity above levels existing without the project. However, implementation of **Mitigation Measure M-NO-2: Construction Noise Reduction**, as described below, during project construction would ensure all construction equipment noise subject to the noise ordinance be maintained at or below the 80 dBA L_{max} at 100 feet limit. Standard mitigation measures to reduce construction-related noise levels have been demonstrated to reduce equipment noise by 5 to 10 dBA.⁴¹ Moveable sound barrier curtains can provide 15 dBA of sound attenuation.⁴² Static sound barrier curtains can provide sounds transmission loss of 16 to 43 dBA, depending on the frequency of the noise source.⁴³ With implementation of these measures, noise reductions to within specified limits are attainable and construction noise impacts for the indicated sensitive receptors would be reduced to less-than-significant levels.

Mitigation Measure M-NO-2: Construction Noise Reduction: The project contractor shall implement the following measures during construction of the project:

- Conduct noise monitoring at the beginning of major construction phases (e.g., demolition, excavation) to determine the need and the effectiveness of noise-attenuation measures.
- Erect temporary plywood noise barriers around the construction site where the site adjoins noise-sensitive receivers.
- Utilize noise control blankets on the building structures adjacent to the proposed project - and possibly other noise-sensitive receivers - as the building is erected to reduce noise emission from the site.

⁴¹ Bolt, Baranek, and Newman, *Noise from Construction Equipment and Operations, Building Equipment and Home Appliances*, December 31, 1971.

⁴² Industrial Noise Control (INC), Product Specification Sheet, INC Portable Noise Screen.

⁴³ Environmental Noise Control (ENC), Product Specification Sheet, ENC STC-32 Sound Control Panel System.

- Post signs on-site pertaining to permitted construction days and hours, complaint procedures, and who to notify in the event of a problem, with telephone numbers listed.
- Notify the Department of Building Inspection (DBI) and neighbors in advance of the schedule for each major phase of construction and expected loud activities.
- When feasible, select "quiet" construction methods and equipment (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures and acoustically-attenuating shields or shrouds).
- Require that all construction equipment be in good working order and that mufflers are inspected to be functioning properly. Avoid unnecessary idling of equipment and engines.
- Mobile noise-generating equipment (e.g., dozers, backhoes, and excavators) shall be required to prepare the entire site. However, the developer will endeavor to avoid placing stationary noise generating equipment (e.g., generators, compressors) within noise-sensitive buffer areas (measured at linear 20 feet) between immediately adjacent neighbors.
- The project sponsor shall require the general contractor to use impact tools (e.g., jack hammers, pavement breakers, and rock drills) that are hydraulically or electrically powered wherever possible to avoid noise associated with compressed air exhaust from pneumatically powered tools. Where use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust shall be used, along with external noise jackets on the tools.
- Ensure that all general construction related activities are restricted to between 7:00 a.m. and 8:00 p.m. per San Francisco Police Code Article 29.

Implementation of **Mitigation Measure M-NO-2** would reduce construction equipment noise impacts to a less-than-significant level.

Impact NO-3: The proposed project would not expose people to excessive groundborne vibration or groundborne noise levels. (*Less-Than-Significant Impact*)

Construction of the proposed project would involve demolition, site preparation, and construction activities but would not involve the use of construction equipment that would result in substantial

groundborne vibration or groundborne noise on properties adjacent to the project site. No pile driving, blasting, or substantial levels of excavation or grading activities are proposed. Furthermore, project operation associated with residential uses would not generate substantial groundborne noise and vibration. Therefore, the project would not result in the exposure of persons to or generation of excessive groundborne noise and vibration. This impact would be less than significant and no mitigation measure is required. This topic will not be addressed in the EIR.

Impact NO-4: The proposed project would not be substantially affected by existing noise levels. (Not Applicable)

This impact is only to be analyzed if the proposed project would exacerbate the existing noise environment. Impacts NO-1 through NO-3 concluded the proposed project would not result in a significant noise impact. Therefore, this impact need not be analyzed and will not be discussed in the EIR. However, the following is provided for informational purposes.

Roadway noise is the predominant source of noise in the project vicinity. The City's background noise levels map identifies the project site to be exposed to traffic noise levels between 65 and 70 dBA L_{dn}.⁴⁴ The City's land use compatibility chart shows that "satisfactory" sound levels for residential land uses are 60 dBA L_{dn} for outdoor environments. For indoor environments, the noise level inside any sleeping or living room in a dwelling unit on residential property should not exceed 45 dBA between 10:00 p.m. and 7:00 a.m. or 55 dBA between 7:00 a.m. and 10:00 p.m.

According to the City's General Plan, new development should incorporate noise insulation features if the noise levels exceed the sound level guidelines shown in the land use compatibility chart. The proposed project would be required to comply with the California Noise Insulation Standards in Title 24. With compliance to the Title 24 standards, the proposed project would feasibly attain acceptable noise levels.

⁴⁴ City and County of San Francisco, *Areas Potentially Requiring Noise Insulations*, March 2009. This document is available for review at: default.sfplanning.org/publications_reports/library_of_cartography/Noise.pdf.

Impact C-NO-1: The proposed project in combination with past, present, and reasonably foreseeable future projects would not create a significant cumulative noise or vibration impact. (*Less-Than-Significant Impact*)

Construction

Construction of the proposed project, such as excavation, grading, or demolition and construction of other buildings in the area, would occur on a temporary and intermittent basis. In general, compliance with Noise Ordinance requirements and implementation of Mitigation Measure M-NO-2 would maintain the noise impact from project construction at a less-than-significant level. Project construction-related noise would not substantially increase ambient noise levels at locations greater than a few hundred feet from the project site. There are no future projects identified within 300 feet of the site that would have the potential to result in cumulative construction noise or vibration impacts during simultaneous construction activities. In addition, the majority of the cumulative development projects within a 0.25-mile radius of the project site are residential additions which would not require use of impact tools

Operations

The proposed project would not include new fixed noise sources that would produce operational noise on the project site (e.g., HVAC or generator equipment) and would generate minimal new mobile source noise. The project-related contribution of 2 PM peak hour trips would represent a small fraction of existing traffic volumes, and therefore would not result in an audible change in traffic noise. In addition, the approximately 18 new residents that would result from implementation of the cumulative development in the project vicinity would generate a similarly low amount of new PM peak hour trips. As such, the proposed project and future projects would not result in traffic noise levels that would substantially increase ambient noise levels in the project site vicinity. Furthermore, the proposed project and future projects in the vicinity primarily consist of residential uses, which are uses that do not typically generate substantial sources of operational noise, and would be subject to comply with the Noise Ordinance's requirements for residential noise limits.

Given this, the proposed project, in combination with past, present, and reasonably foreseeable future projects, would not result in considerable contribution to a permanent increase in noise or vibration in the project area. This impact would be less than significant and no mitigation measure is required. This topic will not be addressed in the EIR.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
6. AIR QUALITY— Would the project:					
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal, State, or regional ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

The San Francisco Bay Area Air Basin (SFBAAB) encompasses San Francisco, Alameda, Contra Costa, San Mateo, and Napa Counties, and includes parts of Solano and Sonoma Counties. Although air quality in the air basin has generally improved over the last several decades, elevated levels of ozone, carbon monoxide, and particulate matter have been observed. The federal Clean Air Act and California Clean Air Act contain ambient air standards and related air quality reporting systems to be used by regional regulatory agencies in developing air pollution control measures. The Bay Area Air Quality Management District (BAAQMD) is the primary responsible regulatory agency in the Bay Area for planning, implementing, and enforcing the federal and State ambient air quality standards

for criteria pollutants. Criteria air pollutants include carbon monoxide (CO), nitrogen dioxide (NO₂), sulfur dioxide (SO₂), particulate matter (PM_{2.5} and PM₁₀), and lead.

In most of the Bay Area, transportation-related sources account for a majority of air pollutant emissions. Therefore, a major focus of the BAAQMD is on reducing vehicle trips associated with new development. Localized air quality issues include CO hotspots associated with traffic.

Health Vulnerable Locations

San Francisco adopted Article 38 of the San Francisco Health Code in 2008, requiring an Air Quality Assessment for new residential projects of 10 or more units located in proximity to high-traffic roadways, as mapped by the Department of Public Health (DPH), to determine whether residents would be exposed to unhealthful levels of PM_{2.5}. The air quality assessment evaluates the concentration of PM_{2.5} from local roadway traffic that may impact a proposed residential development site. If the DPH air quality assessment indicates that the annual average concentration of PM_{2.5} at the site would be greater than 0.2 µg/m³, Health Code Section 3807 requires development on the site to be designed or relocated to avoid exposure greater than 0.2 µg/m³, or a ventilation system to be installed that would be capable of removing 80 percent of ambient PM_{2.5} from habitable areas of the residential units. The proposed project consists of four residential units and, according to the City's Air Pollutant Exposure Zone Map, the proposed project is not within an Air Pollutant Exposure Zone.⁴⁵

Impact AQ-1: Implementation of the proposed project would not conflict with or obstruct implementation of the local applicable air quality plan. (*Less-Than-Significant Impact*)

The applicable air quality plan is the BAAQMD's 2010 Clean Air Plan, which was adopted on September 15, 2010. The Clean Air Plan is a comprehensive plan to improve Bay Area air quality and protect public health. The Clean Air Plan defines a control strategy to reduce emissions and ambient concentrations of air pollutants; safeguard public health by reducing exposure to air pollutants that pose the greatest health risk, with an emphasis on protecting the communities most heavily affected

⁴⁵ City and County of San Francisco. *Air Pollutant Exposure Zone Map*. April 10, 2014. This document is available for review at: www.sfdph.org/dph/files/EHSdocs/AirQuality/AirPollutantExposureZoneMap.pdf.

by air pollution; and reduce greenhouse gas emissions to protect the climate. Consistency with the Clean Air Plan can be determined if the project does the following: 1) supports the goals of the Clean Air Plan; 2) includes applicable control measures from the Clean Air Plan; and 3) would not disrupt or hinder implementation of any control measures from the Clean Air Plan.

An update to the 2010 Clean Air Plan is currently underway. Although it has yet to be adopted, the 2016 Clean Air Plan/Regional Climate Protection Strategy will be a roadmap for the BAAQMD to reduce air pollution and protect public health and the global climate. The 2016 Clean Air Plan will also include measures and programs to reduce emissions of fine particulates and toxic air contaminants. In addition, the Regional Climate Protection Strategy will be included in the 2016 Clean Air Plan, which will identify potential rules, control measures, and strategies that the BAAQMD can pursue to reduce greenhouse gases throughout the Bay Area.

Consistency with the 2010 Clean Air Plan is determined by whether or not the proposed project would result in significant and unavoidable air quality impacts or hinder implementation of control measures (e.g., excessive parking or preclude extension of transit lane or bicycle path). As indicated in the analysis that follows, the proposed project would result in less-than-significant operational and construction-period emissions. Therefore, the proposed project supports the goals of the Clean Air Plan and would not conflict with any of the control measures identified in the plan or designed to bring the region into attainment. Additionally, the proposed project would not substantially increase the population, vehicle trips, or vehicle miles traveled. The proposed project would not hinder the region from attaining the goals outlined in the Clean Air Plan. Therefore, the proposed project would not hinder or disrupt implementation of any control measures from the Clean Air Plan.

This impact would be less than significant, and no mitigation measures would be required. This topic will not be discussed in the EIR.

Impact AQ-2: Implementation of the proposed project would not violate an air quality standard or contribute substantially to an existing or projected air quality violation. (*Less-Than-Significant Impact*)

The proposed project would generate air emissions during project construction and operation. Long-term operational emissions are associated with stationary sources and mobile sources. Stationary source emissions result from the consumption of natural gas and electricity. Mobile source emissions result from vehicle trips and result in air pollutant emissions affecting the entire air basin. Short-term construction emissions would occur in association with construction activities, including demolition, excavation, and vehicle/equipment use.

Operational Air Quality Emissions

Long-term air emission impacts are those associated with area sources and mobile sources related to the proposed project. In addition to the short-term construction emissions, the project would also generate long-term air emissions, such as those associated with changes in permanent use of the project site. These long-term emissions are primarily mobile source emissions that would result from vehicle trips associated with the proposed project. Area sources, such as natural gas heaters, landscape equipment, and use of consumer products, would also result in pollutant emissions.

The BAAQMD has developed screening criteria to provide lead agencies with a conservative indication of whether the proposed project would result in potentially significant air quality impacts. If all of the screening criteria are met by a proposed project, then the lead agency would not need to perform a detailed air quality assessment of the proposed project's emissions. These screening levels are generally representative of new development without any form of mitigation measures taken into consideration. In addition, the screening criteria do not account for project design features, attributes, or local development requirements that could also result in lower emissions.

For condo/townhouse land uses, the BAAQMD screening size for operational criteria pollutants is 451 dwelling units. Since the proposed project would only include four dwelling units, based on the BAAQMD's screening criteria, operation of the proposed project would result in a less-than-significant impact to air quality from criteria air pollutant and precursor emissions. No mitigation measures would be required and this topic will not be discussed in the EIR.

Localized CO Impacts

The BAAQMD has also established a screening methodology that provides a conservative indication of whether the implementation of a proposed project would result in significant CO emissions. According to the BAAQMD CEQA Guidelines, a proposed project would result in a less-than significant impact to localized CO concentrations if the following screening criteria are met:

- The project is consistent with an applicable congestion management program established by the county congestion management agency for designated roads or highways, and the regional transportation plan and local congestion management agency plans.
- Project traffic would not increase traffic volumes at affected intersections to more than 44,000 vehicles per hour.
- The project would not increase traffic volumes at affected intersections to more than 24,000 vehicles per hour where vertical and/or horizontal mixing is substantially limited (e.g., tunnel, parking garage, bridge underpass, natural or urban street canyon, or below-grade roadway).

Implementation of the proposed project would not conflict with the San Francisco County Transportation Authority San Francisco Transportation Plan (SFTP) for designated roads or highways, a regional transportation plan, or other agency plans. The project site is not located in an area where vertical or horizontal mixing of air is substantially limited. In addition, the proposed project would not increase traffic volumes at affected intersections to more than 44,000 vehicles per hour and would not result in localized CO concentrations that exceed State or federal standards. This impact would be less than significant and no mitigation measures would be required. This topic will not be discussed in the EIR.

Construction Emissions

During construction, short-term degradation of air quality may occur due to the release of particulate emissions generated by excavation, grading, hauling, and other activities. Emissions from construction equipment are also anticipated and would include CO, NO_x, ROG, directly-emitted particulate matter (PM_{2.5} and PM₁₀), and toxic air contaminants (TACs) such as diesel exhaust particulate matter.

As discussed above, the BAAQMD has developed screening criteria to provide lead agencies with a conservative indication of whether the proposed project would result in potentially significant air quality impacts. If all of the screening criteria are met by a proposed project, then the lead agency would not need to perform a detailed air quality assessment of the proposed project's emissions. For condo/townhouse land uses, the BAAQMD screening size for construction criteria pollutants is 240 dwelling units. Since the proposed project would only include four dwelling units, based on the BAAQMD's screening criteria, construction of the proposed project would result in a less-than-significant impact to air quality from criteria air pollutant and precursor emissions. No mitigation measures would be required and this topic will not be discussed in the EIR.

Impact AQ-3: Implementation of the proposed project would not result in a cumulatively considerable net increase of a criteria pollutant for which the project region is non-attainment under an applicable federal, State, or regional ambient air quality standard. (*Less-Than-Significant Impact*)

CEQA defines a cumulative impact as two or more individual effects, which when considered together, are considerable or which compound or increase other environmental impacts. According to the BAAQMD, air pollution is largely a cumulative impact and no single project is sufficient in size to itself result in nonattainment of ambient air quality standards. In developing the thresholds of significance for air pollutants used in the analysis above, BAAQMD considered the emission levels for which a project's individual emissions would be cumulatively considerable. The BAAQMD CEQA Air Quality Guidelines indicate that if a project exceeds the identified significance thresholds, its emissions would be cumulatively considerable, resulting in significant adverse air quality impacts to the region's existing air quality conditions. If daily average or annual emissions of operational-related criteria air pollutants exceed any applicable threshold established by the BAAQMD, the proposed project would result in a cumulatively significant impact.

As discussed above, implementation of the proposed project would generate less-than-significant criteria air pollutant and precursor emissions. Therefore, the project would not make a cumulatively considerable contribution to regional air quality impacts. No mitigation measures would be required and this topic will not be discussed in the EIR.

Impact AQ-4: Implementation of the proposed project would not expose sensitive receptors to substantial pollutant concentrations. (*Less-Than-Significant Impact*)

Sensitive receptors are defined as residential uses, schools, daycare centers, nursing homes, and medical centers. Individuals particularly vulnerable to diesel particulate matter are children, whose lung tissue is still developing, and the elderly, who may have serious health problems that can be aggravated by exposure to diesel particulate matter. Exposure from diesel exhaust associated with construction activity contributes to both cancer and chronic non-cancer health risks. As noted above, the project site is not located within an Air Pollutant Exposure Zone.

Excessive Cancer Risk

According to the BAAQMD, a project would result in a significant impact if it would: individually expose sensitive receptors to TACs resulting in an increased cancer risk greater than 10.0 in one million, increased non-cancer risk of greater than 1.0 on the hazard index (chronic or acute), or an annual average ambient PM_{2.5} increase greater than 0.3 µg/m³. A significant cumulative impact would occur if the project in combination with other projects located within a 1,000-foot radius of the project sites would expose sensitive receptors to TACs resulting in an increased cancer risk greater than 100.0 in one million, an increased non-cancer risk of greater than 10.0 on the hazard index (chronic), or an ambient PM_{2.5} increase greater than 0.8 µg/m³ on an annual average basis. Impacts from substantial pollutant concentrations are discussed below. As discussed below, this impact would be less than significant.

The project site is located in a residential neighborhood, and the closest sensitive receptors are residential uses located immediately adjacent to the proposed project. Construction of the proposed project may expose surrounding sensitive receptors to airborne particulates, as well as a small quantity of construction equipment pollutants (i.e., usually diesel-fueled vehicles and equipment). However, project construction emissions would be below the BAAQMD's significance thresholds and once the project is constructed, the project would not be a source of substantial emissions. Therefore, sensitive receptors are not expected to be exposed to substantial pollutant concentrations during project construction or operation, and potential impacts would be considered less than significant.

Based on the foregoing, the proposed project would not expose sensitive receptors to substantial pollutant contributions. Therefore, this impact would be less than significant, and no mitigation measures would be required. This topic will not be discussed in the EIR.

Impact AQ-5: Implementation of the proposed project would not create objectionable odors affecting a substantial number of people. (*Less-Than-Significant Impact*)

During project construction, some odors may be present due to diesel exhaust. However, these odors would be temporary and limited to the construction period. The proposed project would not include any activities or operations that would generate objectionable odors and once operational, the project would not be a source of odors. For these reasons, the proposed project would not create objectionable odors affecting a substantial number of people. Therefore, odor impacts would be less than significant and no mitigation is required. This topic will not be discussed in the EIR.

Impact C-AQ-1: The proposed project, in combination with past, present, and reasonably foreseeable future development in the project area would not contribute to a cumulative air quality impact. (*Less-Than-Significant Impact*)

As discussed above, regional air pollution is by its very nature largely a cumulative impact. Emissions from past, present, and future projects contribute to the region's adverse air quality on a cumulative basis. No single project by itself would be sufficient in size to result in regional nonattainment of ambient air quality standards. Instead, a project's individual emissions contribute to existing cumulative adverse air quality impacts. The project-level thresholds for criteria air pollutants are based on levels by which new sources are not anticipated to contribute to an air quality violation or result in a considerable net increase in criteria air pollutants. Therefore, because the proposed project's construction and operational emissions would not exceed the project-level thresholds for criteria air pollutants, the proposed project would not result in a cumulatively considerable contribution to regional air quality impacts. This impact would be less than significant and no mitigation measures would be required. This topic will not be discussed in the EIR.

Topics:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Not Applicable
7. GREENHOUSE GAS EMISSIONS— Would the project:					
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Greenhouse gas (GHG) emissions and global climate change represent cumulative impacts. GHG emissions cumulatively contribute to the significant adverse environmental impacts of global climate change. No single project could generate enough GHG emissions to noticeably change the global average temperature; instead, the combination of GHG emissions from past, present, and future projects have contributed and will continue to contribute to global climate change and its associated environmental impacts.

The Bay Area Air Quality Management District (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. CEQA Guidelines Section 15064.4 allows lead agencies to rely on a qualitative analysis to describe GHG emissions resulting from a project. CEQA Guidelines Section 15183.5 allows for public agencies to analyze and mitigate GHG emissions as part of a larger plan for the reduction of GHGs and describes the required contents of such a plan. Accordingly, San Francisco has prepared *Strategies to Address Greenhouse Gas Emissions*⁴⁶ which presents a comprehensive assessment of policies, programs, and ordinances that collectively represent San Francisco's qualified GHG reduction strategy in compliance with the CEQA guidelines. These GHG reduction actions have

⁴⁶ San Francisco Planning Department, *Strategies to Address Greenhouse Gas Emissions in San Francisco*, 2010. This document is available online at: www.sf-planning.org/index.aspx?page=2627.

resulted in a 23.3 percent reduction in GHG emissions in 2012 compared to 1990 levels,⁴⁷ exceeding the year 2020 reduction goals outlined in the BAAQMD's *Bay Area 2010 Clean Air Plan*, Executive Order (EO) S-3-05, and Assembly Bill (AB) 32 (also known as the Global Warming Solutions Act).⁴⁸

Given that the City' has met the State and region's 2020 GHG reduction targets and San Francisco's GHG reduction goals are consistent with, or more aggressive than, the long-term goals established under EO S-3-05⁴⁹, EO B-30-15,^{50,51} and Senate Bill (SB) 32^{52,53} the City's GHG reduction goals are consistent with EO S-3-05, EO B-30-15, AB 32, SB 32 and the *Bay Area 2010 Clean Air Plan*. Therefore, proposed projects that are consistent with the City's GHG reduction strategy would be consistent with the aforementioned GHG reduction goals, would not conflict with these plans or result in

⁴⁷ ICF International, *Technical Review of the 2012 Community-wide GHG Inventory for the City and County of San Francisco*, January 21, 2015. Available online at sfenvironment.org/sites/default/files/fliers/files/icf_verificationmemo_2012sfcommunityinventory_2015-01-21.pdf (accessed March 16, 2015).

⁴⁸ 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.

⁴⁹ Office of the Governor, Executive Order S-3-05, June 1, 2005. Available online at www.pcl.org/projects/2008symposium/proceedings/Coatsworth12.pdf (accessed March 16, 2016). Executive Order S-3-05 sets forth a series of target dates by which statewide emissions of GHGs need to be progressively reduced, as follows: by 2010, reduce GHG emissions to 2000 levels (approximately 457 million metric tons of carbon dioxide equivalents [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). Because of the differential heat absorption potential of various GHGs, GHG emissions are frequently measured in "carbon dioxide-equivalents," which present a weighted average based on each gas's heat absorption (or "global warming") potential.

⁵⁰ Office of the Governor, *Executive Order B-30-15*, April 29, 2015. Available at www.gov.ca.gov/news.php?id=18938 (accessed March 3, 2016). Executive Order B-30-15, issued on April 29, 2015, sets forth a target of reducing GHG emissions to 40 percent below 1990 levels by 2030 (estimated at 2.9 million MTCO₂E).

⁵¹ 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.

⁵² Senate Bill 32 amends California Health and Safety Code Division 25.5 (also known as the California Global Warming Solutions Act of 2006) by adding Section 38566, which directs that statewide greenhouse gas emissions to be reduced by 40 percent below 1990 levels by 2030.

⁵³ Senate Bill 32 was paired with Assembly Bill 197, which would modify the structure of the State Air Resources Board; institute requirements for the disclosure of greenhouse gas emissions criteria pollutants, and toxic air contaminants; and establish requirements for the review and adoption of rules, regulations, and measures for the reduction of greenhouse gas emissions.

significant GHG emissions, and would therefore not exceed San Francisco's applicable GHG threshold of significance.

The following analysis of the proposed project's impact on climate change focuses on the project's contribution to cumulatively significant GHG emissions. Because no individual project could emit GHGs at a level that could result in a significant impact on the global climate, this analysis is in a cumulative context, and this section does not include an individual project-specific impact statement.

Impact C-GG-1: The proposed project would generate greenhouse gas emissions, but not at levels that would result in a significant impact on the environment or conflict with any policy, plan, or regulation adopted for the purpose of reducing greenhouse gas emissions. (*Less-Than-Significant Impact*)

Individual projects contribute to the cumulative effects of climate change by directly or indirectly emitting GHGs during construction and operational phases. Direct operational emissions include GHG emissions from new vehicle trips and area sources (natural gas combustion). Indirect emissions include emissions from electricity providers; energy required to pump, treat, and convey water; and emissions associated with waste removal, disposal, and landfill operations.

The proposed project would increase the intensity of use of the site by constructing four new residential units. Therefore, the proposed project would contribute to annual long-term increases in GHGs as a result of increased vehicle trips (mobile sources) and residential 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 reduce the project's GHG emissions related to transportation, energy use, waste disposal, wood burning, and use of refrigerants.

Compliance with the City's Transportation Sustainability Fee and bicycle parking requirements would reduce the proposed project's transportation-related emissions, as applicable. 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, and Water Conservation and Irrigation ordinances, which would promote energy and water efficiency, thereby reducing the proposed project's energy-related GHG emissions.⁵⁴

The proposed project's waste-related emissions would be reduced through compliance with the City's Recycling and Compositing 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 energy⁵⁵ and reducing the energy required to produce new materials.

No existing trees would be removed from the project site. 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).⁵⁶ Thus, the proposed project was determined to be consistent with San Francisco's GHG reduction strategy.⁵⁷

The project sponsor is required to comply with these regulations, which have proven effective as San Francisco's GHG emissions have measurably decreased when compared to 1990 emissions levels,

⁵⁴ Compliance with water conservation measures reduce the energy (and GHG emissions) required to convey, pump and treat water required for the project.

⁵⁵ Embodied energy is the total energy required for the extraction, processing, manufacture and delivery of building materials to the building site.

⁵⁶ 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.

⁵⁷ San Francisco Planning Department, *Greenhouse Gas Analysis: Compliance Checklist for 150 Eureka Street*, January 23, 2017.

demonstrating that the City has met and exceeded EO S-3-05, AB 32, and the *Bay Area 2010 Clean Air Plan* GHG reduction goals for the year 2020. Other existing regulations, such as those implemented through AB 32, will continue to reduce a proposed project's contribution to climate change. In addition, San Francisco's local GHG reduction targets are consistent with the long-term GHG reduction goals of EO S-3-05, EO B-30-15, AB 32, SB 32 and the *Bay Area 2010 Clean Air Plan*. Therefore, because the proposed projects is consistent with the City's GHG reduction strategy, it is also consistent with the GHG reduction goals of EO S-3-05, EO B-30-15, AB 32, SB 32 and the *Bay Area 2010 Clean Air Plan*, would not conflict with these plans, and would therefore not exceed San Francisco's applicable GHG threshold of significance. As such, the proposed project would result in a less-than-significant impact with respect to GHG emissions. No mitigation measures are necessary. This topic will not be discussed in the EIR.

Topics:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Not Applicable
8. WIND AND SHADOW— Would the project:					
a) Alter wind in a manner that substantially affects public areas?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Create new shadow in a manner that substantially affects outdoor recreation facilities or other public areas?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Impact WS-1: The proposed project would not alter wind in a manner that substantially affects public areas within the vicinity of the project area. (*Less-Than-Significant Impact*)

A proposed project's wind impacts are directly related to its height, orientation, design, location and surrounding development context. Based on wind analyses for other development projects in San Francisco, a building that does not exceed 85 feet generally has little potential to cause substantial changes to ground-level wind conditions. The proposed project would construct two 40-foot-tall buildings that would be about the same height as existing adjacent and nearby buildings. The proposed project would also be oriented towards Eureka Street in a similar manner as buildings surrounding the project site. As such, the proposed project would not alter wind in a manner that

substantially affects public areas. This impact would be less than significant, and no mitigation measures would be required. This topic will not be discussed in the EIR.

Impact WS-2: The proposed project would not create new shadow in a manner that substantially affects outdoor recreation facilities or other public areas. (*Less-Than-Significant Impact*)

In 1984, San Francisco voters approved an initiative known as “Proposition K, The Sunlight Ordinance,” which was codified as Planning Code Section 295 in 1985. 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. Public open spaces that are not under the jurisdiction of the Recreation and Park Commission as well as private open spaces are not subject to Planning Code Section 295.

Implementation of the proposed project would result in the construction of two 40-foot-tall buildings, which would be similar in size to existing surrounding buildings. As the proposed buildings would be up to 40 feet tall, they are not subject to Section 295 of the Planning Code. The proposed project is expected to shade portions of streets, sidewalks, and private properties in the project vicinity at various times of the day throughout the year. However, shadows on streets and sidewalks would not exceed levels commonly expected in urban areas. Although occupants of nearby properties may regard the increase in shadow as undesirable, the limited increase in shading of private properties as a result of the proposed project would not be considered a significant impact under CEQA. Further, there are no recreational facilities or public open space areas within 0.25 mile of the project site that could be affected by project shadows.

For these reasons, the proposed project would not create new shadow in a manner that substantially affects outdoor recreation facilities and other public areas. This impact would be less than significant, and no mitigation measures would be required.

Impact C-WS-1: The proposed project, in combination with past, present, and reasonably foreseeable future projects, would not result in a cumulative wind or shadow impacts. (*Less-Than-Significant Impact*)

Wind

As discussed above, buildings shorter than 85 feet have little potential to cause substantial changes to ground-level wind conditions. Given that the height limit in the project vicinity is 40 feet, none of the nearby cumulative development projects would be tall enough to alter wind in a manner that substantially affects public areas. Furthermore, wind impacts are localized and site-specific, and the nearest cumulative development project is one block away from the project site. Therefore, the proposed project would not make a cumulatively considerable contribution to any potential cumulative wind impacts in the project site vicinity.

Shadow

The proposed project would not cast net new shadow on any nearby parks or public open spaces. All other reasonably foreseeable projects in the project vicinity and subject to Planning Code Section 295 would have to undergo a shadow analysis to determine and avoid substantial net new shading of public open spaces. Therefore, the proposed project would not make a cumulatively considerable contribution to any potential cumulative shadow impact on parks and open spaces.

For the above reasons, the proposed project would not combine with past, present, and reasonably foreseeable future projects in the project vicinity to create a significant cumulative wind or shadow impact. No mitigation measures are necessary and this topic will not be discussed in the EIR.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
9. RECREATION— Would the project:					
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Physically degrade existing recreational resources?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Impact RE-1: The proposed project would not increase 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. (*Less-Than-Significant Impact*)

The neighborhood parks or other recreational facilities closest to the project site are Seward Mini Park (0.3 miles southwest of the project site), Kite Hill Open Space (0.3 miles southwest), and Corona Heights Park (0.5 miles north). The proposed project would increase the population of the project site by about 8 residents. This residential population growth would increase the demand for recreational facilities. The proposed project would partially offset the demand for recreational facilities by providing approximately 2,736 square feet of on-site open space in the form of penthouse decks and backyard space. The project residents may use parks, open spaces, and other recreational facilities in the project vicinity. However, the additional use of these recreational facilities is expected to be modest based on the size of the projected population increase and would not result in the substantial physical deterioration of recreational facilities. Therefore this impact would be less than significant and no mitigation measures would be required. This topic will not be discussed in the EIR.

Impact RE-2: The proposed project would not include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment. (*Less-Than-Significant Impact*)

The proposed project would provide approximately 2,736 square feet of on-site open space for the project residents in the form of private backyards and penthouse decks. This open space would partially offset the demand for recreational facilities. In addition, the project site is within walking distance to a number of parks, open spaces, or other recreational facilities, as discussed above. It is anticipated that these existing recreational facilities would be able to accommodate the increase in demand for recreational resources generated by the project residents. For these reasons, the construction of new or the expansion of existing recreational facilities, both of which might have an adverse physical effect on the environment, would not be required. This impact would be less than significant and no mitigation measures would be required. This topic will not be discussed in the EIR.

Impact RE-3: The proposed project would not physically degrade existing recreational resources. (Less-Than-Significant Impact)

The proposed project would not result in the physical alteration or degradation of any recreational resources in the project vicinity or the City as a whole. Project-related construction activities would occur within the boundaries of the project site, which does not include any existing recreational resources. This impact would be less than significant and no mitigation measures would be required. This topic will not be discussed in the EIR.

Impact C-RE-1: The proposed project, in combination with past, present, and reasonably foreseeable future projects, would not result in a cumulative impact on recreational facilities or open space resources. (Less-Than-Significant Impact)

Cumulative development in the project vicinity would result in a minor intensification of land uses and a cumulative increase in the demand for recreational facilities and resources. The City has accounted for such growth as part of the Recreation and Open Space Element of the General Plan. In addition, San Francisco voters passed two bond measures, in 2008 and 2012, to fund the acquisition, planning, and renovation of the City's network of recreational resources. As discussed above, there are four parks, open spaces, or other recreational facilities within less than 0.5 miles of the project site. It is expected that these existing recreational facilities would be able to accommodate the increase in demand for recreational resources generated by the proposed project and nearby cumulative development projects (approximately 26 new residents). For these reasons, the proposed project would not combine with past, present, and reasonably foreseeable future project in the project

vicinity to create a significant cumulative impact on recreational facilities or resources. This impact would be less than significant and no mitigation measures would be required. This topic will not be discussed in the EIR.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
10. UTILITIES AND SERVICE SYSTEMS— Would the project:					
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Have sufficient water supply available to serve the project from existing entitlements and resources, or require new or expanded water supply resources or entitlements?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Result in a determination by the wastewater treatment provider that would serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g) Comply with federal, State, and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

The project site is within an urban area that is served by utility service systems, including water, wastewater and stormwater collection and treatment, and solid waste collection and disposal. The proposed project would add new daytime and nighttime population to the site that would increase the demand for utilities and service systems on the site, but not in excess of amounts expected and provided for in the project area.

Impact UT-1: Implementation of the proposed project would not exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board, would not exceed the capacity of the wastewater treatment provider that would serve the project, and would not require the construction of new or expansion of existing wastewater treatment or stormwater drainage facilities. (*Less-Than-Significant Impact*)

Project-related wastewater and stormwater would flow to the City's combined stormwater/sewer system and would be treated to standards contained in the City's National Pollutant Discharge Elimination System (NPDES) Permit for the Southeast Water Pollution Control Plant prior to discharge into San Francisco Bay. The NPDES standards are set and regulated by the San Francisco Bay Area Regional Water Quality Control Board (RWQCB). Therefore, the proposed project would not conflict with RWQCB requirements related to wastewater discharge.

The project site is currently covered with impervious surfaces comprised almost entirely of the existing vacant structure and the proposed project would increase the amount of pervious surfaces on the site, resulting in less stormwater volume discharged through the combined sewer system. While the proposed project would continue to contribute to sewage flows in the area, it would not cause collection treatment capacity of the sewer system in the City to be exceeded compared to existing conditions. As such, the proposed project would not exceed wastewater treatment requirements of the RWQCB and would not require the construction of new wastewater/stormwater treatment facilities or expansion of existing ones. Because the project is fully developed at present, new development could not result in an increase in stormwater runoff. However, the project would be required to comply with the City's Stormwater Design Guidelines, and thus would reduce the total stormwater runoff volume and peak stormwater runoff rate, compared to existing conditions, through the use of Low Impact Design approaches and Best Management Practices such as rainwater reuse, landscape planters, and rain gardens. The SFPUC would review and approve the project's stormwater compliance strategy.

For the reasons discussed above, the proposed project would incrementally increase demand for and use of these services, but not in excess of amounts expected and provided for in this area. The proposed project would not exceed any applicable wastewater treatment requirements or otherwise conflict with RWQCB requirements, and the minor population increase associated with the proposed project would not exceed the capacity of the existing wastewater treatment provider or substantially

increase the demand for wastewater treatment or stormwater drainage facilities requiring the construction of new facilities or expansion of existing facilities. This impact would be less than significant and no mitigation measures are required. This topic will not be discussed in the EIR.

Impact UT-2: The proposed project would not require expansion or construction of new water supply or treatment facilities. (*Less-Than-Significant Impact*)

The proposed project would add residential units to the project site, which would increase the demand for water on the site compared to existing conditions, but not in excess of amounts expected and provided for in the project area. Although the proposed project would incrementally increase the demand for water in San Francisco, the estimated increase in demand could be accommodated within anticipated water use and supply for the City.⁵⁸ The proposed project would also be designed to incorporate water-conserving measures, such as low-flush toilets and urinals, as required by the San Francisco Green Building Ordinance. The project site is not located within a designated recycled water use area, as defined in the Recycled Water Ordinance 390-91 and 393-94; thus, the project is not required to install a recycled water system. Since the proposed project's water demand could be accommodated by the existing and planned supply anticipated under the San Francisco Public Utilities Commission's (SFPUC's) 2010 Urban Water Management Plan (UWMP), as updated by the SFPUC's 2013 Water Availability Study, the proposed project would result in less-than-significant impacts related to water services. No mitigation measures would be required and this topic will not be discussed in the EIR.

Impact UT-3: The proposed project would be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs. (*Less-Than-Significant Impact*)

In September 2015, the City entered into a landfill disposal agreement with Recology, Inc. for disposal of all solid waste collected in San Francisco at the Recology Hay Road Landfill in Solano County for nine years or until 3.4 million tons have been disposed whichever occurs first. The City

⁵⁸ San Francisco Public Utilities Commission, *2010 Urban Water Management Plan*, June 2011. This document is available for review at: www.sfwater.org/Modules/ShowDocument.aspx?documentID=1055.

would have an option to renew the agreement for a period of six years or until an additional 1.6 million tons have been disposed, whichever occurs first.⁵⁹ The Recology Hay Road Landfill is permitted to accept up to 2,400 tons per day of solid waste, at that maximum rate the landfill would have capacity to accommodate solid waste until approximately 2034. At present, the landfill receives an average of approximately 1,850 tons per day from all sources, with approximately 1,200 tons per day from San Francisco; at this rate landfill closure would occur in 2041. The City's contract with the Recology Hay Road Landfill is set to terminate in 2031 or when 5 million tons have been disposed, whichever occurs first. At that point, the City will either further extend the Recology Hay Road Landfill contract or find and entitle another landfill site. The proposed project, which would include demolition and construction waste and operational waste associated with the residential use, would generate a minimal amount of solid waste to be deposited at the landfill. Therefore, the proposed project would be served by landfills with sufficient permitted capacity to accommodate its solid waste disposal needs. This impact would be less than significant and no mitigation measures would be required. This topic will not be discussed in the EIR.

Impact UT-4: Construction and operation of the proposed project would comply with all applicable statutes and regulations related to solid waste. (*Less-Than-Significant Impact*)

The California Integrated Waste Management Act of 1989 (AB 939) requires municipalities to adopt an Integrated Waste Management Plan (IWMP) to establish objectives, policies, and programs relative to waste disposal, management, source reduction, and recycling. Reports filed by the San Francisco Department of the Environment showed the City generated approximately 870,000 tons of waste material in 2000. By 2010, that figure decreased to approximately 455,000 tons. Waste diverted from landfills is defined as recycled or composted.⁶⁰ San Francisco has a goal of 75 percent landfill diversion by 2010 and 100 percent by 2020. As of 2012 (the most recent year reported), 80 percent of

⁵⁹ San Francisco Planning Department, *Agreement for Disposal of San Francisco Municipal Solid Waste at Recology Hay Road Landfill in Solano County Final Negative Declaration*, Planning Department Case No. 2014.0653, May 21, 2015. Available online at: sfmea.sfplanning.org/2014.0653E_Revised_FND.pdf.

⁶⁰ CalRecycle, Jurisdiction Diversion/Disposal Rate Detail. Available online at: www.calrecycle.ca.gov/LGCentral/Reports/Viewer.aspx?P=OriginJurisdictionIDs%3d438%26ReportYear%3d2013%26ReportName%3dReportEDRSJurisDisposalByFacility.

San Francisco's solid waste was being diverted from landfills, indicating that San Francisco met the 2010 diversion target.⁶¹

In September, 2015, the City approved an Agreement with Recology, Inc., for the transport and disposal of the City's municipal solid waste at the Recology Hay Road Landfill in Solano County. The City began disposing its municipal solid waste at Recology Hay Road Landfill in January, 2016, and that practice is anticipated to continue for approximately nine years, with an option to renew the Agreement thereafter for an additional six years. San Francisco had a goal of 75 percent solid waste diversion by 2010, which it exceeded at 80 percent diversion, and has a goal of 100 percent solid waste diversion or "zero waste" to landfill or incineration by 2020. San Francisco Ordinance No. 27-06 requires mixed construction and demolition debris be transported by a Registered Transporter and taken to a Registered Facility that must recover for reuse or recycling and divert from landfill at least 65 percent of all received construction and demolition debris. The San Francisco Green Building Code also requires certain projects to submit a Recovery Plan to the Department of the Environment demonstrating recovery or diversion of at least 75 percent of all demolition debris. San Francisco's Mandatory Recycling and Composting Ordinance No. 100-09 requires all properties and everyone in the city to separate their recyclables, compostables, and landfill trash.

Therefore, given the above, the construction and operation of the project would result in a less-than-significant impact regarding compliance with all applicable statutes and regulations related to solid waste. No mitigation measures would be required and this topic will not be discussed in the EIR.

Impact C-UT-1: The proposed project, in combination with past, present, and reasonably foreseeable future projects, would not result in a cumulative impact related to utilities or service systems. (*Less-Than-Significant Impact*)

⁶¹ San Francisco Department of the Environment, Zero Waste Program, "San Francisco Sets North American Record for Recycling and Composting with 80 Percent Diversion Rate." Available online at www.sfenvironment.org/news/press-release/mayor-lee-announces-san-francisco-reaches-80-percent-landfill-waste-diversion-leads-all-cities-in-north-america.

Cumulative development in the project site vicinity would incrementally increase demand on citywide utilities and service systems, but not beyond levels anticipated and planned for by public service providers. The SFPUC has accounted for such growth in its water demand and wastewater service projections, and the City has implemented various programs to divert 80 percent of its solid waste from landfills. Nearby cumulative development projects would be subject to the same water conservation, wastewater discharge, recycling and composting, and construction demolition and debris ordinances applicable to the proposed project. Compliance with these ordinances would reduce the effects of nearby cumulative development projects to less-than-significant levels. For these reasons, the proposed project would not combine with past, present, and reasonably foreseeable future projects in the project vicinity to create a significant cumulative impact on utilities and service systems. No mitigation measures would be required and this topic will not be discussed in the EIR.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
11. PUBLIC SERVICES— Would the project:					
a) Result in substantial adverse physical impacts associated with the provision of, or the need for, new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any public services such as fire protection, police protection, schools, parks, or other services?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

The proposed project's impacts on parks and recreation are discussed under **Section H.9, Recreation**. Impacts to other public services are discussed below.

Impact PS-1: The proposed project would not result in a substantial adverse physical impact associated with the provision of police services. (*Less-Than-Significant Impact*)

The project site currently receives police services from the San Francisco Police Department (SFPD). The proposed project would result in the addition of four residential units on the currently unoccupied project site and is unlikely to result in an increase in demand for police service calls in the

project area. Police protection is provided by the Mission Police Station located at 630 Valencia Street, approximately 1.2 miles east of the project site. The Mission Station would be able to provide the necessary police services and crime prevention in the area. Meeting the service demand associated with four residential units at the project site would not require the construction of new police facilities that could cause significant environmental impact. As such the impact would be less than significant and no mitigation measures would be required. This topic will not be discussed in the EIR.

Impact PS-2: The proposed project would not result in a substantial adverse physical impact associated with the provision of fire services. (*Less-Than-Significant Impact*)

The project site receives fire protection services from the San Francisco Fire Department (SFFD). Fire stations located nearby include Station 24, at 100 Hoffman Avenue approximately 0.6 miles southeast of the project site; Station 6 at 135 Sanchez Street approximately 0.7 miles from the project; and Station 12, at 1145 Stanyan Street approximately 1.2 miles northwest of the project site. The proposed project would result in the addition of four residential units on the currently unoccupied project site and is unlikely to result in an increase in demand for fire service calls in the project area. Moreover, the proposed project would be required to comply with all applicable building and fire code requirements, which identify specific fire protection systems, including, but not limited to, the provision of State-mandated smoke alarms, fire alarm and sprinkler systems, fire extinguishers, fire-rated walls, the required number and location of egress with appropriate distance separation, and emergency response notification systems. Compliance with all applicable building and fire codes, would further reduce the demand for Fire Department service and oversight.

Given that the proposed project would not result in a fire service demand beyond the projected growth for the area or the city, the proposed project would not result in the need for new fire protection facilities, and would have no adverse impact on the physical environment related to the construction of new or physically altered fire protection facilities. This impact would be less than significant and no mitigation measures would be required. This topic will not be discussed in the EIR.

Impact PS-3: The proposed project would not result in a substantial adverse physical impact associated with the provision of school services. (*Less-Than-Significant Impact*)

The San Francisco Unified School District (SFUSD) provides public primary and secondary education in the City and County of San Francisco. The Harvey Milk Civil Rights Elementary School at 4235 19th Street is approximately 0.1 miles southeast of the project site. Everett Middle School at 450 Church Street is located approximately 0.8 miles northeast of the site. The nearest high school to the project site is Mission High School at 3750 18th Street, approximately 0.8 miles east of the project site.

Based on a student generation rate employed by SFUSD of 0.203 students per dwelling unit, the four residential units that would be built as part of the proposed project could generate approximately one K-12 student. Similar to other City-wide developments, the proposed project would be assessed \$2.42 per gross square foot for the increase in residential space. The estimated one additional new student would not require the construction or expansion of school facilities. It is anticipated that the new student could be accommodated by existing schools under the jurisdiction of the SFUSD since the SFUSD is currently not experiencing high growth rates, and facilities throughout the City and County are generally underutilized. The SFUSD is not planning to construct new schools near the project site. Given that SFUSD has adequate facilities to accommodate growth, the new student generated by the proposed project would not substantially increase demand for school facilities in San Francisco and would not result in a significant impact. In addition, as with all new development, the project sponsor would be required to pay one-time school impact fees under Government Code Section 65995(b)(3), as stated above, which could be used by SFUSD for costs associated with providing facilities for new students.

In addition, The Leroy F. Greene School Facilities Act of 1998, or Senate Bill 50 (SB 50), restricts the ability of local agencies, such as the City of San Francisco, to deny land use approvals on the basis that public school facilities are inadequate. SB 50 establishes the base amount of allowable developer fees for school facilities at \$2.24 per square foot of residential construction and \$0.21 per square foot of commercial construction as of 2006. These fees are intended to address local school facility needs resulting from new development. Public school districts may, however, impose higher fees provided they meet the conditions outlined in the act.

Based on the foregoing, the proposed project would not result in a substantially increased demand for school facilities, and would not require new or expanded school facilities. Therefore, this impact would be less than significant and no mitigation measures would be required. This topic will not be discussed in the EIR.

Impact PS-4: The proposed project would not result in a substantial adverse physical impact associated with the provision of other public services, such as libraries. (*Less-Than-Significant Impact*)

Implementation of the proposed project would add approximately 8 residents to the project site which would increase the demand for other public services such as libraries. This increase in demand would not be substantial given the overall demand for library services on a citywide basis. The San Francisco Public Library (SFPL) operates 28 branches throughout the City and it is anticipated that the Eureka Valley Branch Center, which is located 0.5 miles northeast of the project site, would be able to accommodate the minor increase in demand for library services generated by the proposed project. For these reasons, the proposed project would not require the construction of new or alteration of existing governmental facilities. This impact would be less than significant and no mitigation measures would be required. This topic will not be discussed in the EIR.

Impact PS-5: The proposed project, in combination with past, present, and reasonably foreseeable projects, would not result in a cumulative impact on public services. (*Less-Than-Significant Impact*)

Cumulative development in the project vicinity would result in a minor intensification of land uses and a cumulative increase in the demand for fire protection, police protection, school services, and other public services. The Fire Department, the Police Department, the SFUSD, SFPL, and other City agencies have accounted for such growth in providing public services to the residents of San Francisco. Nearby cumulative development projects would be subject to many of the same development impact fees applicable to the proposed project. For these reasons, the proposed project would not combine with past, present, and reasonably foreseeable future projects in the project vicinity to create a significant cumulative impact on public services. This impact would be less than significant and no mitigation measures would be required. This topic will not be discussed in the EIR.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
12. BIOLOGICAL RESOURCES— Would the project:					
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<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 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The project site is located within a built environment and does not contain riparian habitat or other sensitive natural communities as defined by the California Department of Fish and Wildlife and the United States Fish and Wildlife Service; therefore, Topic 12.b is not applicable to the proposed project. In addition, the project area does not contain wetlands as defined by Section 404 of the Clean Water Act; therefore, Topic 12.c is also not applicable. Finally, there are no adopted Habitat Conservation Plans, Natural Community Conservation Plans, or other approved local, State, or regional habitat conservation plans applicable to the project site. Therefore, implementation of the proposed project could not conflict with the provisions of any such plan and Topic 12.f is not applicable to the proposed project.

Impact BI-1: The proposed project would not have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species, riparian habitat or sensitive natural communities, and would not interfere substantially with any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites. (*Less-Than-Significant Impact*)

The project site is a developed lot in a built urban environment and does not include any candidate, sensitive, or special-status species, any riparian habitat, or other sensitive natural community identified in regional plans, policies, or regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service, nor would it interfere substantially with any native resident or migratory species, or species movement or migratory corridors.

Migrating birds do pass through San Francisco. Nesting birds, their nests, and eggs are fully protected by *California Fish and Game Code* (Sections 3503, 3503.5) and the federal Migratory Bird Treaty Act (MBTA). Although the proposed project would be subject to the MBTA, the site does not contain habitat supporting migratory birds.

San Francisco is within the Pacific Flyway, a major north-south route of travel for migratory birds along the western portion of the Americas. Planning Code Section 139, Standards for Bird-Safe Buildings, establishes building design standards to reduce avian mortality rates associated with bird strikes. This ordinance focuses on location-specific hazards and building feature-related hazards. Location-specific hazards apply to buildings in, or within 300 feet of and having a direct line of sight to, an Urban Bird Refuge, which is defined as an open space “two acres and larger dominated by vegetation, including vegetated landscaping, forest, meadows, grassland, or wetlands, or open water.” The project site is not in or within 300 feet of an Urban Bird Refuge, so the standards related to location-specific hazards are not applicable to the proposed project. Feature-related hazards, which can occur on buildings anywhere in San Francisco, are defined as freestanding glass walls, wind barriers, skywalks, balconies, and greenhouses on rooftops that have unbroken glazed segments of 24 sf or larger. The proposed project would comply with the feature-related standards of Planning Code Section 139 by using bird-safe glazing treatment on 100 percent of any feature-related hazards.

Implementation of the proposed project would not modify any natural habitat and this impact would be less than significant with compliance with City-adopted regulations for bird safe buildings. No mitigation measures would be required and this topic will not be addressed in the EIR.

Impact BI-2: The proposed project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. (No Impact)

The City's Urban Forestry Ordinance, *Public Works Code* Sections 801 et. seq., requires a permit from San Francisco Public Works to remove any protected trees. There are no existing trees or other vegetation on the project site that would be removed as part of the proposed project, and as previously discussed, the two existing street trees that front the project site would be retained. The proposed project would not conflict with any local policies or ordinances that protect biological resources, and no impact would occur. This topic will not be addressed in the EIR.

Impact C-BI-1: The proposed project, in combination with past, present, and reasonably foreseeable future projects, would not result in a cumulative impact related to biological resources. (Less-Than-Significant Impact)

Cumulative development in the project vicinity would result in the construction of multi-story buildings that can injure or kill birds in the event of a collision and would result in the removal of existing street trees or other vegetation. Nearby cumulative development projects would be subject to the same bird-safe building and urban forestry ordinances applicable to the proposed project. Compliance with these ordinances would reduce the effects of nearby cumulative development projects to less-than-significant levels. Moreover, there are no candidate, sensitive, or special-status species, any riparian habitat, or other sensitive natural community in the project vicinity. For these reasons, the proposed project would not combine with past, present, and reasonably foreseeable future projects in the project vicinity to create a significant cumulative impact on biological resources. This impact would be less than significant and no mitigation measures would be required. This topic will not be addressed in the EIR.

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

The project site would be connected to the City's existing sewer system and would not require use of septic systems. Therefore, Topic 13.e would not be applicable to the project site.

The analysis in this section is based, in part, on the Geotechnical Investigation prepared for the proposed project.⁶² The project site is underlain by Quaternary-age surficial deposits and firm to very

⁶² H. Allen Gruen, Geotechnical Engineer, *Geotechnical Investigation, Planned Development at 150 Eureka Street, San Francisco, California*, November 28, 2016. This document is available for review at the San Francisco Planning Department, 1650 Mission Street, Suite 400, as part of Case File No. 2015-011274ENV.

stiff, sandy lean clay as well as firm to hard, lean clay with varying amounts of sand from the ground surface to depths of 10 feet. Groundwater was not encountered at the maximum boring depth of 10 feet. The Geotechnical Investigation concluded that the proposed project would be supported on a conventional spread footing foundation bearing in competent earth materials. If the spread footings would cover a substantial portion of the building area, a mat foundation may be used as an alternative to reduce forming and steel bending costs. The maximum depth of excavation would be 4.5 feet in the northwest corner of the 142-146 Eureka Street Building.

Impact GE-1: The proposed project would not increase the exposure of people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, seismic groundshaking, liquefaction, lateral spreading, or landslides. (*Less-Than-Significant Impact*)

Due to the potential for strong ground shaking in the San Francisco Bay Area, this impact would be considered significant if the proposed project increased the exposure of people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, seismic groundshaking, liquefaction, lateral spreading, or landslides. Currently, the existing church building is vacant and unoccupied. The proposed project would result in the construction of residential uses on the site, increasing the number of residents on the site by approximately eight persons. However, as discussed below, the project site is not located in an area that would substantially increase the risk of exposure to seismic hazards; therefore, this impact would be less than significant.

The project site is not located within an Earthquake Fault Zone as defined by the Alquist-Priolo Earthquake Fault Zoning Act and no known or potentially active fault exists on the site.⁶³ No active faults have been mapped on the project site by the United States Geological Survey (USGS) or the

⁶³ California Department of Conservation, California Geological Survey, Alquist-Priolo Fault Zones in Electronic Format, 2010. This document is available for review at www.quake.ca.gov/gmaps/ap/ap_maps.htm and at the San Francisco Planning Department, 1650 Mission Street, Suite 400, as part of Case File No. 2015-011274ENV.

California Geological Survey (CGS).⁶⁴ In a seismically active area, such as the San Francisco Bay Area, the possibility exists for future faulting in areas where no faults previously existed. However, since faults with known surface rupture have been mapped in California, and no evidence of active faulting on the site has been found, the potential for impacts to the proposed project due to fault rupture are less than significant.

However, the project site is located within a seismic hazard zone and like the entire San Francisco Bay Area, is subject to ground shaking in the event of an earthquake on regional fault lines.⁶⁵ The site is located approximately 5.5 miles northeast of the San Andreas Fault and 11 miles west of the northern Hayward Fault. The 2007 Working Group on California Earthquake Probabilities estimates that there is a 63 percent chance that a magnitude 6.7 or greater earthquake will occur in the San Francisco Bay Area within 30 years. The Association of Bay Area Governments (ABAG) has classified the Modified Mercalli Intensity Shaking Severity Level of ground shaking in the project vicinity due to an earthquake on the North Golden Gate segment of the San Andreas Fault System as “VIII-Very Strong.”⁶⁶ Therefore, it is likely that the site would experience periodic minor or major earthquakes associated with a regional fault, resulting in strong to very strong ground shaking.

Ground shaking associated with an earthquake on one of the regional faults around the project site may result in ground failure, such as that associated with soil liquefaction, lateral spreading, and differential compaction. The project site lies within a liquefaction potential zone as mapped by the California Division of Mines and Geology. However, borings at the site indicate that the liquefaction potential at the site is low and that post-liquefaction settlements of less than 1 inch would occur.

⁶⁴ U.S. Geological Survey and California Geological Survey, Quaternary Fault and Fold Database for the United States, 2010. This document is available for review at www.earthquake.usgs.gov/hazards/qfaults and at the San Francisco Planning Department, 1650 Mission Street, Suite 400, as part of Case File No. 2015-011274ENV.

⁶⁵ California Division of Mines and Geology, State of California Seismic Hazard Zones, City and County of San Francisco Official Map, November 17, 2000. This document is available for review at gmw.consrv.ca.gov/shmp/download/pdf/ozn_sf.pdf.

⁶⁶ Association of Bay Area Governments, Earthquake Shaking Hazard Map, San Francisco Scenario, North Golden Gate Segment of the San Andreas Fault System, 2003. This document is available for review at resilience.abag.ca.gov/earthquakes.

Because the project site is generally flat and the liquefaction potential is low, lateral spreading would be unlikely to occur. Risks associated with liquefaction and differential compaction would be reduced with implementation of standard building engineering and design measures.

As shown on the official State of California Seismic Hazards Zone Map for San Francisco prepared under the Seismic Hazards Mapping Act of 1990,⁶⁷ the project site is not located within an area subject to landslides (see Map 5 of the Community Safety Element). Therefore, the proposed project would result in less-than-significant landslide-related impacts.

Given the above, the proposed project would not increase the exposure of people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, seismic groundshaking, liquefaction, lateral spreading, or landslides. This impact would be less than significant and no mitigation measures would be required. This topic will not be addressed in the EIR.

Impact GE-2: The proposed project would not result in substantial loss of topsoil or erosion. (*Less-Than-Significant Impact*)

The proposed project is currently covered with impervious surfaces and does not contain native top soil. Although excavation would occur as part of the proposed project, compliance with the City's Construction Site Water Pollution Prevention Program,⁶⁸ which would require the project sponsor to prepare and implement an erosion and sediment-control plan (subject to review by the City). Compliance with this regulation would reduce and control site runoff during construction activities and reduce the potential for erosion to a less-than-significant level. No mitigation measures would be required and this topic will not be discussed in the EIR.

⁶⁷ The Seismic Hazards Mapping Act was developed to protect the public from the effects of strong ground shaking, liquefaction, landslides, or other ground failure, and from other hazards caused by earthquakes. This Act requires the State Geologist to delineate various seismic hazard zones and requires cities, counties, and other local permitting agencies to regulate certain development projects within these zones.

⁶⁸ San Francisco Municipal Code (Public Works Code) Part II. Chapter 10. Article 4.1. 40 GF Section 403.

Impact GE-3: The proposed project would not be located on a geologic unit 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. (*Less-Than-Significant Impact*)

The project site and vicinity do not include any hills or cut slopes that could cause or be subject to a landslide. Temporary slopes would be necessary during site excavations. If excavations undermine or remove support from the existing and adjacent structures, it may be necessary to underpin those structures. The final design of the foundation system would be included in a design-level geotechnical investigation that is based on site-specific data in accordance with building code requirements. According to the Geotechnical Investigation, soils at the site are capable of supporting a conventional spread footing or mat foundation in accordance with industry standards and building code requirements. Drilled piers may also be utilized to support the foundation or for shoring and underpinning. Excavation activities would require the use of shoring and underpinning in accordance with the recommendations of the geotechnical report and *San Francisco Building Code* requirements. Groundwater is not anticipated to be encountered during excavation and grading activities.

Adherence to San Francisco Building Code requirements would ensure that the project applicant include analysis of and mitigation for any potential impacts related to unstable soils as part of the design-level geotechnical investigation prepared for the proposed project; therefore, any potential impacts related to unstable soils would be less than significant and no mitigation measures would be required. This topic will not be discussed in the EIR.

Impact GE-4: The proposed project could be located on expansive soil, as defined in the California Building Code, creating substantial risk to life or property. (*Less-Than-Significant Impact*)

Expansive soils expand and contract in response to changes in soil moisture, most notably when near surface soils vacillate between a saturated, low-moisture, and a saturated, high-moisture content condition. The presence of expansive soils is typically determined based on site specific data. As noted above, the site is underlain by firm to very stiff, sandy lean clay as well as firm to hard, lean clay with varying amounts of sand. Expansive soils may be encountered at the site; the San Francisco Building Code includes a requirement that the project applicant include analysis of the potential for soil expansion as part of the design-level geotechnical investigation prepared for the proposed

project. Compliance with existing building code requirements (which the design-level geotechnical report would be required to comply with), would ensure that any potential impacts related to expansive soils would be less than significant. No mitigation measures would be required and this topic will not be addressed in the EIR.

Impact GE-5: The proposed project would not substantially change the topography of the site or any unique geologic or physical features of the site. (*Less-Than-Significant Impact*)

The project site is located on a site that is generally flat and that contains no unique topography. Minor excavations would be required to support the building foundation. Therefore, the proposed project would have no impact with respect to alterations to topographical features. This impact would be less than significant and no mitigation measures would be required. This topic will not be addressed in the EIR.

Impact GE-6: The proposed project would not indirectly destroy a unique paleontological resource or site or unique geologic feature. (*Less-than-Significant Impact*)

Paleontological resources include fossilized remains or traces of animals, plants, and invertebrates, including their imprints, from a previous geological period. Collecting localities and the geologic formations containing those localities are also considered paleontological resources as they represent a limited, non-renewable resource and once destroyed, cannot be replaced.

Paleontological resources are lithologically dependent; that is, deposition and preservation of paleontological resources are related to the lithologic unit in which they occur. If the rock types representing a deposition environment conducive to deposition and preservation of fossils are not favorable, fossils will not be present. Lithological units that may be fossiliferous include sedimentary formations.

Within San Francisco, geologic conditions associated with the Colma Formation are known to contain fossils. Significant fossils, including mammoth and bison, have been recovered from the Colma Formation. The project site is underlain by fill and sandy to clayey soils within what is known as the Franciscan Complex. Because of the way in which the Franciscan Complex was formed and because

no conditions associated with the Colma Formation were encountered, the site is considered to be of low paleontological sensitivity. Furthermore, site foundations are not expected to reach below a depth of 4.5 feet. Because the likelihood of accidental discovery of paleontological resources or unique geological features is small, there would be a less-than-significant impact on unique paleontological resources or geologic features. Therefore, the potential accidental discovery of paleontological resources or unique geologic features during construction would be a less-than-significant impact and no mitigation measures would be required. This topic will not be addressed in the EIR.

Impact C-GE-1: The proposed project, in combination with past, present, and reasonably foreseeable future projects, would not result in a cumulative impact related to geology and soils. (*Less-Than-Significant Impact*)

The proposed project would result in less-than-significant impacts related to topographical features and risk of injury or death involving landslides. Impacts related to rupture of an earthquake fault, seismic ground shaking or ground failure, unstable soil, or the loss of top soil would be less than significant. Impacts to paleontological resources and geologic features would also be less than significant. Geology and soils impacts are generally site-specific and localized and do not have cumulative effects with other projects. These impacts are specific to the project and would not combine with similar impacts associated with past, present, and reasonably foreseeable future projects in the site vicinity. These impacts would be less than significant and no mitigation measures would be required. This topic will not be addressed in the EIR.

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

The project is located well inland from both the San Francisco Bay and the Pacific Ocean, and is not subject to seiche or potential inundation in the event of a levee or dam failure or tsunami occurring along the San Francisco coast (Maps Five, Six and Seven of the Community Safety Element of the General Plan).⁶⁹ In addition, the developed area of the project site would not be subject to mudflow. Therefore, Topic 14.j does not apply. The project site is also not located within a 100-year flood hazard area designated on the City's interim floodplain map, and would not place housing or structures within a 100-year flood hazard area that would impede or redirect flood flows.⁷⁰ Therefore, Topics 14.g, 14.h, and 14.i are also not applicable.

Impact HY-1: The proposed project would not violate water quality standards or otherwise substantially degrade water quality. (*Less-Than-Significant Impact*)

Wastewater and stormwater flows generated on the project site flow into the City's combined sewer system and into the Southeast Water Pollution Control Plant, where they are treated prior to discharge into San Francisco Bay. Treatment is undertaken consistent with the effluent discharge standards established by the plant's National Pollutant Discharge Elimination System (NPDES) permit. In accordance with the permit, discharges of treated wastewater and stormwater into San Francisco Bay meet the requirements of the Clean Water Act, Combined Sewer Overflow Control Policy, and associated State requirements in the Water Quality and Control Plan for the San Francisco Bay Basin and do not violate water quality standards.

The San Francisco Stormwater Design Guidelines, which were adopted by the SFPUC on January 12, 2010, require project applicants proposing development or redevelopment projects disturbing more than 5,000 square feet of ground surface to manage stormwater on-site. Based on the Stormwater Design Guidelines, the discharge of stormwater must be reduced to the maximum extent practicable using management practices, control techniques, and system, design, and engineering methods. The

⁶⁹ San Francisco, City and County of, *San Francisco General Plan, Community Safety Element*, April 2007. This document is available for review at the Planning Department in Case File No. 2011.0409E.

⁷⁰ Federal Emergency Management Agency, Preliminary Flood Insurance Rate Map, 2016. Available online at: sfgsa.org/sites/default/files/Document/SF_NE.pdf.

proposed project would result in the disturbance of more than 5,000 square feet of ground surface and would therefore be required to comply with the Stormwater Design Guidelines. For residential development such as the proposed project, the Stormwater Design Guidelines recommend the use of features such as green roofs, permeable paving, cisterns, and bio-retention planters to capture runoff. It is expected that a mixture of these features would be implemented on the project site. These features are categorized under the umbrella of low-impact design (LID), a design method characterized by the use of ecological and landscape-based strategies to manage stormwater. In particular, LID strategies direct runoff to design elements and landscape features that capture, filter, and slow stormwater runoff.

The implementation of LID strategies on the project site, in accordance with the Stormwater Design Guidelines, would reduce the amount of stormwater entering the City's sewer system, reducing the need for treatment, the risk of treatment system overflows (due to capacity limits), and the possibility of flooding due to system overloads. Treatment system overloads and associated flooding also result in degradation of water quality. Therefore, implementation of Stormwater Design Guidelines as part of the proposed project would also reduce impacts to water quality associated with the inability of City infrastructure to adequately capture and treat stormwater during periods of high precipitation, and would aid in meeting City water quality standards. Therefore, the proposed project would not be expected to otherwise degrade water quality nor violate water quality standards. This impact would be less than significant and no mitigation measures would be required. This topic will not be addressed in the EIR.

Impact HY-2: The proposed project would not 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. (*Less-Than-Significant Impact*)

The proposed project would reduce the amount of impervious surfaces currently on the project site through implementation of LID and other measures identified in the Stormwater Design Guidelines. Because the proposed project would introduce new pervious open space to the site in the form of the new rear yard, the project would not adversely affect groundwater recharge (and could incrementally improve recharge). Compliance with requirements of the City's Industrial Waste Ordinance and implementation of LID and other measures identified in the Stormwater Design Guidelines would

ensure that the project would not 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. This impact would be less than significant and no mitigation measures would be required. This topic will not be addressed in the EIR.

Impact HY-3: The proposed project would not result in altered drainage patterns that would cause substantial erosion or flooding. (*Less-Than-Significant Impact*)

The project site is covered with impervious surfaces and no streams or creeks occur on the project site. The proposed project would incrementally reduce the amount of impervious surface currently located on the project site through implementation of LID and other measures identified in the Stormwater Management Ordinance. Surface coverage would not substantially change from existing conditions as part of the proposed project and drainage patterns would remain similar to existing conditions. Therefore, the proposed project would not be expected to result in substantial erosion or flooding associated with changes in drainage patterns. This impact would be less than significant and no mitigation measures would be required. This topic will not be addressed in the EIR.

Impact HY-4: The proposed project would not contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. (*Less-Than-Significant Impact*)

During operation of the proposed project, all wastewater and stormwater runoff from the project site would be treated at the Southeast Water Pollution Control Plant. Treatment would be provided pursuant to the effluent discharge standards contained in the City's NPDES permit for the plant. During construction and operation, the proposed project would be required to comply with all local wastewater discharge and water quality requirements including the San Francisco Stormwater Design Guidelines. The Stormwater Design Guidelines would ensure that all stormwater generated by the proposed project is managed on-site such that the project would not contribute additional volumes of polluted runoff to the City's stormwater infrastructure. Therefore, the proposed project would not exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. As such, this impact would be less than significant and no mitigation measures would be required. This topic will not be addressed in the EIR.

Impact C-HY-1: The proposed project, in combination with past, present, and reasonably foreseeable future projects in the site vicinity, would result in less-than-significant cumulative impacts to hydrology and water quality. (*Less-Than-Significant Impact*)

As stated above, the proposed project would result in no impacts or less-than-significant impacts related to water quality, groundwater levels, alteration of drainage patterns, capacity of drainage infrastructure, 100-year flood zones, failure of dams or levees, and/or seiche, tsunami, and/or mudflow hazards. The proposed project would adhere to the same water quality and drainage control requirements that apply to all land use development projects in San Francisco. Since all development projects would be required to follow the same drainage, dewatering and water quality regulations, peak stormwater drainage rates and volumes for the design storm would gradually decrease over time with the implementation of new, conforming development projects. Thus, no substantial adverse cumulative effects with respect to drainage patterns, water quality, stormwater runoff, or stormwater capacity of the combined sewer system would occur.

Further, San Francisco's limited use of groundwater would preclude any significant adverse cumulative effects to groundwater levels, and the proposed project would not contribute to any cumulative effects with respect to groundwater. In general, hazards related to 100-year flood zones, failure of dams or levees, and/or seiche, tsunami, and/or mudflows are extremely unusual and are not considered to be substantive impacts in San Francisco such that any cumulative significant impacts would be anticipated, particularly in the interior areas of the city where the project site is located. Cumulative impacts are not anticipated since all development projects would be required to follow the same drainage, dewatering and water quality regulations as the proposed project. Thus, the proposed project would not combine with past, present, and reasonably foreseeable future projects in the project vicinity to create significant cumulative hydrology and water quality impacts. This impact would be less than significant and no mitigation measures would be required. This topic will not be addressed in the EIR.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
15. HAZARDS AND HAZARDOUS MATERIALS— Would the project:					
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
h) Expose people or structures to a significant risk of loss, injury or death involving fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

The project site is not located within an airport land use plan area or in the vicinity of a private airstrip. Therefore, Questions 15.e and 15.f are not applicable.

Impact HZ-1: The proposed project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. (*Less-Than-Significant Impact*)

Construction activities would require the use of limited quantities of hazardous materials such as fuels, oils solvents, paints, and other common construction materials. The City would require the project sponsor and its contractor to implement Best Management Practices (BMPs) as part of their construction activities, including hazardous materials management measures, which would reduce the hazards associated with short-term construction-related transport, and use and disposal of hazardous materials to less-than-significant levels.

The proposed project's residential uses would involve the use of relatively small quantities of hazardous materials such as cleaners and disinfectants for routine purposes. These products are labeled to inform users of potential risks and to instruct them in appropriate handling procedures. Most of these materials are consumed through use, resulting in relatively little waste. For these reasons, the proposed project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. This impact would be less than significant and no mitigation measures would be required. This topic will not be addressed in the EIR.

Impact HZ-2: The proposed project would not create a significant hazard to the public or the environment through reasonably foreseeable conditions involving the release of hazardous materials into the environment. (*Less-Than-Significant Impact*)

The project site is not located in a Maher Area, meaning that it is not known or suspected to contain contaminated soils and/or groundwater.⁷¹ The Phase I Environmental Site Assessment⁷² conducted at the project site did not identify any hazardous conditions at the site, with the exception of potential asbestos-containing materials (ACMs) and lead-based paint.

⁷¹ San Francisco Planning Department, Expanded Maher Map Area, March 2015. This document is available for review at: www.sf-planning.org/ftp/files/publications_reports/library_of_cartography/Maher%20Map.pdf.

⁷² Innovative and Creative Environmental Solutions, Phase I Environmental Site Assessment, 150 Eureka Street, San Francisco, California, November 3, 2016. This document is available for review at the San Francisco Planning Department, 1650 Mission Street, Suite 400, as part of Case File No. 2015-011274ENV.

The California Department of Toxic Substance Control considers asbestos hazardous, and removal of ACMs is required prior to demolition or construction activities that could result in disturbance of these materials. Asbestos-containing materials must be removed in accordance with local and State regulations, BAAQMD, the California Occupational Safety and Health Administration (Cal OSHA), and California Department of Health Services requirements.

Section 19827.5 of the California Health and Safety Code requires that local agencies not issue demolition or alteration permits until an applicant has demonstrated compliance with notification requirements under applicable federal regulations regarding hazardous air pollutants, including asbestos. The California legislature vests the BAAQMD with the authority to regulate airborne pollutants, including asbestos, through both inspection and law enforcement, and the BAAQMD is to be notified 10 days in advance of any proposed demolition or abatement work. Any asbestos-containing material disturbance at the project site would be subject to the requirements of BAAQMD Regulation 11, Rule 2: Hazardous Materials—Asbestos Demolition, Renovation, and Manufacturing. The local office of Cal OSHA must also be notified of asbestos abatement to be carried out. Asbestos abatement contractors must follow State regulations contained in Title 8 of California Code of Regulations Section 1529 and Sections 341.6 through 341.14, where there is asbestos-related work involving 100 gsf or more of asbestos-containing material. The owner of the property where abatement is to occur must have a Hazardous Waste Generator Number assigned by and registered with the Office of the California Department of Health Services. The contractor and hauler of the material are required to file a Hazardous Waste Manifest that details the hauling of the material from the site and the disposal of it. Pursuant to California law, DBI would not issue the required permit until the applicant has complied with the requirements described above. These regulations and procedures already established as part of the building permit review process would ensure that any potential impacts due to asbestos would be reduced to a less-than-significant level.

Work that could result in disturbance of lead paint must comply with Section 3426 of the San Francisco Building Code, Work Practices for Lead-Based Paint on Pre-1979 Buildings and Steel Structures. Where there is any work that may disturb or remove lead paint on the exterior of any building built prior to 1979, Section 3426 requires specific notification and work standards, and identifies prohibited work methods and penalties.

Section 3426 applies to the exterior of all buildings or steel structures on which original construction was completed prior to 1979 (which are assumed to have lead-based paint on their surfaces, unless demonstrated otherwise through laboratory analysis), and to the interior of residential buildings, hotels, and child care centers. The ordinance contains performance standards, including establishment of containment barriers, at least as effective at protecting human health and the environment as those in the U.S. Department of Housing and Urban Development Guidelines (the most recent Guidelines for Evaluation and Control of Lead-Based Paint Hazards) and identifies prohibited practices that may not be used in disturbances or removal of lead-based paint. Any person performing work subject to the ordinance shall, to the maximum extent possible, protect the ground from contamination during exterior work; protect floors and other horizontal surfaces from work debris during interior work; and make all reasonable efforts to prevent migration of lead paint contaminants beyond containment barriers during the course of the work. Clean-up standards require the removal of visible work debris, including the use of a High Efficiency Particulate Air Filter (HEPA) vacuum following interior work.

The ordinance also includes notification requirements and requirements for signs. Prior to the commencement of work, the responsible party must provide written notice to the Director of DBI, of the address and location of the project; the scope of work, including specific location within the site; methods and tools to be used; the approximate age of the structure; anticipated job start and completion dates for the work; whether the building is residential or nonresidential, owner-occupied or rental property; the dates by which the responsible party has fulfilled or will fulfill any tenant or adjacent property notification requirements; and the name, address, telephone number, and pager number of the party who will perform the work. Further notice requirements include a Posted Sign notifying the public of restricted access to the work area, a Notice to Residential Occupants, Availability of Pamphlet related to protection from lead in the home, and Notice of Early Commencement of Work (by Owner, Requested by Tenant), and Notice of Lead Contaminated Dust or Soil, if applicable. Section 3426 contains provisions regarding inspection and sampling for compliance by DBI, as well as enforcement, and describes penalties for non-compliance with the requirements of the ordinance.

Demolition would also be subject to the Cal OSHA Lead in Construction Standard (8 CCR Section 1532.1). This standard requires development and implementation of a lead compliance plan when materials containing lead would be disturbed during construction. The plan must describe activities that could emit lead, methods that will be used to comply with the standard, safe work practices, and a plan to protect workers from exposure to lead during construction activities. Cal/OSHA would require 24-hour notification if more than 100 square feet of materials containing lead would be disturbed.

Implementation of procedures required by Section 3426 of the Building Code and the Lead in Construction Standard would ensure that potential impacts of demolition or renovation of structures with lead-based paint would be less than significant.

Based on mandatory compliance with existing regulatory requirements and the information and conclusions from the Phase I, the proposed project would not result in a significant hazard to the public or environment from contaminated soil and/or groundwater, asbestos, or lead-based paint, and the proposed project would result in a less-than-significant impact with respect to these hazards and no mitigation would be required. This topic will not be addressed in the EIR.

Impact HZ-3: The proposed project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 miles of an existing school. (*Less-Than-Significant Impact*)

Marin Preparatory School located at 117 Diamond Street, located about 510 feet east (0.01 miles) of the project site, is the only school located within 0.25 miles of the project site. However, as noted above, the proposed project would not result in the storage, handling, or disposal of significant quantities of hazardous materials and would not otherwise include any uses that would result in the emission of hazardous substances. Demolition activities would comply with applicable regulations governing the removal of asbestos-containing and lead-based materials. As such, the proposed project would have a less-than-significant impact related to hazardous emissions or the handling of hazardous materials within 0.25 miles of a school and this impact would be less than significant. This topic will not be addressed in the EIR.

Impact HZ-4: The project site is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, and the proposed project would 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. (*Less-Than-Significant Impact*)

The project site is not included on a list of hazardous materials sites compiled by the California Department of Toxic Substance Control pursuant to Government Code Section 65962.5 and, as previously discussed, the project site is not located in a Maher Area. As such, the proposed project is not included on a list of hazardous materials sites and the proposed project would not result in the accidental release of hazardous materials into the environment. This impact would be less than significant and no mitigation measures would be required. This topic will not be addressed in the EIR.

Impact HZ-5: The proposed project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan and would not expose people or structures to a significant risk of loss, injury, or death involving fires. (*Less-Than-Significant Impact*)

The proposed project would redevelop the existing site with residential uses and would not alter the existing street grid. The proposed project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

The City requires that existing and new buildings meet fire safety standards through compliance with the applicable provisions of the Building Code and Fire Code. In addition, the San Francisco Fire Department and DBI review final building plans of projects containing more than two residential units to ensure code compliance. The proposed project would include four residential units and would be subject to compliance with all Building Code and Fire Code standards. Therefore, the proposed project's compliance with Building Code and Fire Code requirements would result in a less-than-significant impact related to the exposure of persons or structures to fire risks. This topic will not be addressed in the EIR.

Impact C-HZ-1: The proposed project, in combination with past, present, and reasonably foreseeable future projects in the site vicinity, would result in less-than-significant cumulative impacts related to hazards and hazardous materials. (*Less-Than-Significant Impact*)

Hazards-related impacts are generally site-specific and typically do not combine with impacts from other planned and foreseeable projects to result in significant cumulative impacts. New developments in the vicinity of the project site would be subject to the same regulatory requirements as the proposed project. Therefore, large, unexpected releases of hazardous materials of the type that would contribute to significant cumulative impacts are not expected. Compliance with existing regulations pertaining to the treatment and management of hazardous materials would ensure that the proposed project would not make a significant cumulative contribution to the release of hazardous materials. Therefore, the proposed project would not combine with past, present, and reasonably foreseeable future projects in the project vicinity to create significant cumulative hazards impacts. This impact would be less than significant and no mitigation would be required. This topic will not be addressed in the EIR.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
16. MINERAL AND ENERGY RESOURCES— Would the project:					
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State?	<input type="checkbox"/>	<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 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

All land in the City of San Francisco, including the project site, is designated by the CGS as Mineral Resource Zone Four (MRZ-4) under the Surface Mining and Reclamation Act of 1975. The MRZ-4 designation indicates that adequate information does not exist to assign the area to any other MRZ; thus, the area is not designated to have significant mineral deposits. The project site has previously been developed, and future evaluations of the presence of minerals at this site would therefore not be affected by the proposed project. Further, the development and operation of the proposed project would not have an impact on any off-site operational mineral resource recovery sites. Therefore, Topics 16.a and 16.b are not applicable to the proposed project.

Impact ME-1: The proposed project would not encourage activities which would result in the use of large amounts of fuel, water, or energy, or use these in a wasteful manner. (*Less-Than-Significant Impact*)

Development of new residential uses as part of the proposed project would not result in the consumption of large amounts of fuel, water, or energy. As a new building in San Francisco, the proposed project is required to conform to energy conservation standards specified by the San Francisco Building Code, including the San Francisco Green Building Ordinance. The measures required by the San Francisco Green Building Ordinance are intended to reduce greenhouse gas emissions associated with new construction and rehabilitation activities, increase energy efficiency, reduce water use, and realize other environmental gains. Compliance with the San Francisco Green Building Ordinance would reduce the use of energy and water by the proposed project.

Based on the above information, the proposed project would not result in the consumption of large amounts of fuel, water, or energy. This impact would be less than significant and no mitigation measures would be required. This topic will not be addressed in the EIR.

Impact C-ME-1: The proposed project, in combination with past, present, and reasonably foreseeable future projects in the site vicinity, would result in less-than-significant cumulative impacts to minerals and energy. (*Less-Than-Significant Impact*)

As described above, no known mineral resources exist at the project site, and therefore the proposed project would not contribute to any cumulative impacts related to mineral resources. Compliance with current State and local standards regarding energy consumption and conservation, including

Title 24 of the California Code of Regulations and the San Francisco Green Building Ordinance, would ensure that the project would not in and of itself require a major expansion of power facilities. Therefore, the energy demand associated with the proposed project would result in a less-than-significant physical environmental effect. The proposed project would not contribute to cumulatively considerable impacts related to energy and natural resources. Overall, the proposed project would not result in cumulatively considerable impacts related to mineral and energy resources. This impact would be less than significant and no mitigation measures would be required. This topic will not be addressed in the EIR.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
17. AGRICULTURE AND FOREST RESOURCES In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the State's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.					
—Would the project:					
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input 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 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 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 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 type="checkbox"/>	<input checked="" type="checkbox"/>

The project site is located within an urbanized area of San Francisco. No land in San Francisco County has been designated by the California Department of Conservation's Farmland Mapping and Monitoring Program as agricultural land. The project site does not contain agricultural uses and is not zoned for such uses. As such, the proposed project would not require the conversion of any land designated as prime farmland, unique farmland, or Farmland of Statewide Importance to non-agricultural use. The proposed project would not conflict with any existing agricultural zoning or Williamson Act contracts and the California Department of Conservation designates the project site as "Urban and Built-Up Land." No land in San Francisco is designated as forest land or timberland by the State Public Resource Code. Therefore, the proposed project would not conflict with zoning for forest land, cause a loss of forest land, or convert forest land to a different use. For these reasons, Topics 17.a, 17.b, 17.c, 17.d, and 17.e are not applicable to the proposed project.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
18. MANDATORY FINDINGS OF SIGNIFICANCE— Would the project:					
a) Have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have impacts that would be individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Have environmental effects that would cause substantial adverse effects on human beings, either directly or indirectly?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

The foregoing analysis identifies potentially significant impacts to cultural resources, which would be further analyzed in the EIR.

- (a) As discussed, the proposed project is anticipated to have less-than-significant impacts on the environmental topics identified in this Initial Study. However, the project could result in potentially significant impacts due to the demolition of the existing church building, which is considered to be individually eligible for listing on the California Register of Historic Places due to its association with the City's LGBTQ community.
- (b) The proposed project in combination with past, present and foreseeable projects as described in Section E, would not result in cumulative impacts to land use, aesthetics, population and housing, transportation and circulation, noise, air quality, wind and shadow, GHG emissions, recreation, utilities and service systems, public services, biological resources, geology and soils, hydrology and water quality, hazards and hazardous materials, mineral and energy resources, and agricultural and forest resources. However, the proposed project in combination with the past, present and foreseeable projects could result in cumulative impacts to historic architectural resources and associated plans and policies that protect these resources, which will be further analyzed in the EIR.
- (c) The proposed project, as discussed above, would not result in significant adverse impacts on human beings, either directly or indirectly. No further analysis will be required in the EIR.

I. MITIGATION MEASURES AND IMPROVEMENT MEASURES

The following mitigation measures have been identified to reduce potentially significant environmental impacts resulting from the proposed project to less-than-significant levels.⁷³

Mitigation Measures

Mitigation Measure M-CP-2: Accidental Discovery of Archeological Resources. The following measures shall be implemented should construction activities result in the accidental discovery of a cultural resource:

The following mitigation measure is required to avoid any potential adverse effect from the proposed project on accidentally discovered buried or submerged historical resources as defined in CEQA Guidelines Section 15064.5(a)(c).

The project sponsor shall distribute the Planning Department archeological resource “ALERT” sheet to the project prime contractor; to any project subcontractor (including demolition, excavation, grading, foundation, etc. firms); or utilities firm involved in soils disturbing activities within the project site. Prior to any soils disturbing activities being undertaken each contractor is responsible for ensuring that the “ALERT” sheet is circulated to all field personnel including, machine operators, field crew, supervisory personnel, etc. The project sponsor shall provide the ERO with a signed affidavit from the responsible parties (prime contractor, subcontractor(s), and utilities firm) to the ERO confirming that all field personnel have received copies of the Alert Sheet.

⁷³ Agreement to Implement Mitigation Measures, Case No. 2015-011274ENV, 150 Eureka Street, April 27, 2017.

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

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

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

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

Copies of the Draft FARR shall be sent to the ERO for review and approval. Once approved by the ERO, copies of the FARR shall be distributed as follows: California Archeological Site Survey Northwest Information Center (NWIC) shall receive one (1) copy and the ERO shall receive a copy of the transmittal of the FARR to the NWIC. The Environmental Planning division of the Planning Department shall receive one bound copy, one unbound copy and one unlocked, searchable PDF copy on CD 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 Historic Places. 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.

Mitigation Measure M-CP-3: Human Remains and Associated or Unassociated Funerary Objects. The treatment of human remains and of associated or unassociated funerary objects discovered during any soils disturbing activity shall comply with applicable State and Federal laws. This shall include immediate notification of the Coroner of the City and County of San Francisco and in the event of the Coroner's determination that the human remains are Native American remains, notification of the California State Native American Heritage Commission (NAHC) who shall appoint a Most Likely Descendant (MLD) (Pub. Res. Code Sec. 5097.98). The archeological consultant, project sponsor, ERO, and MLD shall have up to but not beyond six days after the discovery to make all reasonable efforts to develop an agreement for the treatment of human remains and associated or unassociated funerary objects with appropriate dignity (CEQA Guidelines. Sec. 15064.5(d)). The agreement should take into consideration the appropriate excavation, removal, recordation, analysis, custodianship, curation, and final disposition of the human remains and associated or unassociated funerary objects. Nothing in existing State regulations or in this mitigation measure compels the project sponsor and the ERO to accept recommendations of an MLD. The archeological consultant shall retain possession of any Native American human remains and associated or unassociated burial objects until completion of any scientific analyses of the human remains or objects as specified in the treatment agreement if such as agreement has been made or, otherwise, as determined by the archeological consultant and the ERO.

Mitigation Measure M-CP-4: Tribal Cultural Resources Interpretive Program: If the ERO determines that a significant archeological resource is present, and if in consultation with the affiliated Native American tribal representatives, the ERO determines that the resource constitutes a tribal cultural resource (TCR) and that the resource could be adversely affected by the proposed project, the proposed project shall be redesigned so as to avoid any adverse effect on the significant tribal cultural resource, if feasible.

If the ERO, in consultation with the affiliated Native American tribal representatives and the project sponsor, determines that preservation-in-place of the tribal cultural resources is not a sufficient or feasible option, the project sponsor shall implement an interpretive program of the TCR in consultation with affiliated tribal representatives. An interpretive plan produced in consultation with the ERO and affiliated tribal representatives, at a minimum, and approved by the ERO would be required to guide the interpretive program. The plan shall identify, as appropriate, proposed locations for installations or displays, the proposed content and materials of those displays or installation, the producers or artists of the displays or installation, and a long-term maintenance program. The interpretive program may include artist installations, preferably by local Native American artists, oral histories with local Native Americans, artifacts displays and interpretation, and educational panels or other informational displays.

Mitigation Measure M-NO-2: Construction Noise Reduction The project contractor shall implement the following measures during construction of the project:

- Conduct noise monitoring at the beginning of major construction phases (e.g., demolition, excavation) to determine the need and the effectiveness of noise-attenuation measures.
- Erect temporary plywood noise barriers around the construction site where the site adjoins noise-sensitive receivers.
- Utilize noise control blankets on the building structures adjacent to the proposed project - and possibly other noise-sensitive receivers - as the building is erected to reduce noise emission from the site.

- Post signs on-site pertaining to permitted construction days and hours, complaint procedures, and who to notify in the event of a problem, with telephone numbers listed.
- Notify the Department of Building Inspection (DBI) and neighbors in advance of the schedule for each major phase of construction and expected loud activities.
- When feasible, select "quiet" construction methods and equipment (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures and acoustically-attenuating shields or shrouds).
- Require that all construction equipment be in good working order and that mufflers are inspected to be functioning properly. Avoid unnecessary idling of equipment and engines.
- Mobile noise-generating equipment (e.g., dozers, backhoes, and excavators) shall be required to prepare the entire site. However, the developer will endeavor to avoid placing stationary noise generating equipment (e.g., generators, compressors) within noise-sensitive buffer areas (measured at linear 20 feet) between immediately adjacent neighbors.
- The project sponsor shall require the general contractor to use impact tools (e.g., jack hammers, pavement breakers, and rock drills) that are hydraulically or electrically powered wherever possible to avoid noise associated with compressed air exhaust from pneumatically powered tools. Where use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust shall be used, along with external noise jackets on the tools.
- Ensure that all general construction related activities are restricted to between 7:00 a.m. and 8:00 p.m.

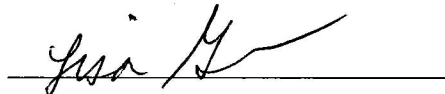
J. PUBLIC NOTICE AND COMMENT

Concurrently with this Initial Study, the San Francisco Planning Department has issued a Notice of Preparation (NOP) of an Environmental Impact Report for the 150 Eureka Street Project. Together, the NOP and this Initial Study are called the NOP/Initial Study. The NOP/Initial Study (or a Notice of Availability of a NOP/Initial Study) is sent to owners of properties within 300 feet of the project site, neighborhood organizations, and other interested parties. Publication of the NOP/Initial Study initiates a 30-day public review and comment period. Comments received on the NOP/Initial Study will be considered in preparation of the EIR analysis.

K. DETERMINATION

On the basis of this Initial Study:

- ☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- ☐ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- ☒ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- ☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- ☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, no further environmental documentation is required.



Lisa M. Gibson
Environmental Review Officer
for
John Rahaim
Director of Planning

DATE 5/24/17

L. INITIAL STUDY PREPARERS

REPORT AUTHORS

Planning Department, City and County of San Francisco Environmental Planning Division

165 Mission Street, Suite 400
San Francisco, CA 94103

Environmental Review Officer: Lisa M. Gibson
Senior Environmental Planner: Joy Navarrete
Environmental Planner: Jenny Delumo
Historic Preservation Planner: Marcelle Boudreaux

ENVIRONMENTAL CONSULTANTS

LSA Associates, Inc.

2215 Fifth Street
Berkeley, CA 94701

Principal-in-Charge: Judith H. Malamut, AICP
Project Manager: Theresa Wallace, AICP
Planner: Matt Kawashima
Air Quality/Noise Specialist: Amy Fischer
Air Quality/Planner: Cara Carlucci
Support Staff: Patty Linder, Charis Hanshaw

PROJECT SPONSOR

150 Eureka Street LLC

3501 California Street, Suite 200
San Francisco, CA 94118

Project Sponsor: David Papale

Reuben, Junius & Rose, LLP

One Bush Street, Suite 600
San Francisco, CA 94104

Project Attorney: David Silverman

Gary Gee Architects

98 Brady Street, #8
San Francisco, CA 94103

Project Architect: Gary Gee, AIA

**PLACE
POSTAGE
HERE**

San Francisco Planning Department
Environmental Planning Division
1650 Mission Street, Suite 400
San Francisco, California 94103

Attn: Jenny Delumo, Environmental Planner
Case No. 2015.011274ENV
150 Eureka Street Project

PLEASE CUT ALONG DOTTED LINE

RETURN REQUEST REQUIRED FOR FINAL
ENVIRONMENTAL IMPACT REPORT

REQUEST FOR FINAL ENVIRONMENTAL IMPACT REPORT

TO: San Francisco Planning Department, Environmental Planning Division

- Check one box: ☐ Please send me a copy of the Final EIR on CD
☐ Please send me a paper copy of the Final EIR

Signed: _____

Print Your Name and Address in the Box Below: