



SAN FRANCISCO PLANNING DEPARTMENT

Certificate of Determination EXEMPTION FROM ENVIRONMENTAL REVIEW

Case No.: 2014.1201E
 Project Address: 2435-2445 16th Street
 Zoning: UMU – Urban Mixed Use District
 68-X Height and Bulk District
 Block/Lot: 3965/021
 Lot Size: 10,000 square feet
 Plan Area: Eastern Neighborhoods Area Plan (Mission Sub-Area Plan)
 Project Sponsor: Marc Dimalanta, D-Scheme Studio Architects; 415-252-0888
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PROJECT DESCRIPTION

The proposed project entails demolition of an approximately 10,000-square-foot (sf), one-story, 20-foot-tall auto repair and services shop built in 1924 and construction of a seven-story, approximately 68-foot-tall (78-foot-tall including elevator penthouse) mixed-use residential building with a basement-level parking garage. The approximately 54,180-gross-square-foot (gsf) building would consist of 53 dwelling units (5 three bedroom, 18 two bedroom and 30 one bedroom), approximately 3,265 sf of commercial space, and 7,155 sf of open space (6,370 common open space provided by second-floor rear yard and roof decks plus 785 sf provided by private decks). The approximately 7,485-sf basement level with a parking lot accessed via a ramp from Florida Street would contain 40 parking spaces for cars. A total of 60 Class I bicycle parking spaces would be provided (28 spaces in the basement and 32 spaces on the ground-level floor). Eight Class II bicycle spaces would also be provided on the sidewalk outside the proposed building (four on Florida Street and four on 16th Street). In addition to three separately entered units of

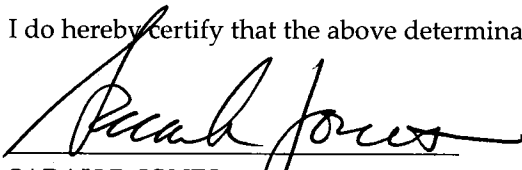
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EXEMPT STATUS

Exempt per Section 15183 of the California Environmental Quality Act (CEQA) Guidelines and California Public Resources Code Section 21083.3

DETERMINATION

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


 SARAH B. JONES
 Environmental Review Officer

March 22, 2016
 Date

cc: Marc Dimalanta, Project Sponsor; Supervisor Campos, District 9; Shaunn Mendrin, Current Planning Division; Virna Byrd, M.D.F.; Exemption/Exclusion File

PROJECT DESCRIPTION (continued)

commercial space fronting on 16th Street, the ground floor would also include two residential units, a lobby and outdoor decks. Four existing trees (two each on the Florida and 16th Street frontages) would be retained and six new trees would be planted (three each on the Florida and 16th Street frontages). Construction of the proposed building would involve soil disturbance over the entire project site and approximately 20 feet of below-grade excavation for the foundation (resulting in removal of about 7,040 cubic yards of soil).

PROJECT APPROVAL

The proposed project would require the following approvals:

Actions by the Planning Commission

- Large Project Authorization pursuant to Planning Code Section 329 for new construction of more than 25,000 gsf.

Actions by Other City Departments

- Demolition and Building Permits (Department of Building Inspection) for the demolition of the existing gas station and construction of the proposed project.

The Large Project Authorization approval by the Planning Commission is the Approval Action for the project. The Approval Action date establishes the start of the 30-day appeal period for this CEQA exemption determination pursuant to Section 31.04(h) of the San Francisco Administrative Code.

COMMUNITY PLAN EXEMPTION OVERVIEW

California Public Resources Code Section 21083.3 and CEQA Guidelines Section 15183 provide an exemption from environmental review for projects that are consistent with the development density established by existing zoning, community plan or general plan policies for which an Environmental Impact Report (EIR) was certified, except as might be necessary to examine whether there are project-specific significant effects which are peculiar to the project or its site. Section 15183 specifies that examination of environmental effects shall be limited to those effects that: a) are peculiar to the project or parcel on which the project would be located; b) were not analyzed as significant effects in a prior EIR on the zoning action, general plan or community plan with which the project is consistent; c) are potentially significant off-site and cumulative impacts that were not discussed in the underlying EIR; or d) are previously identified in the EIR, but which, as a result of substantial new information that was not known at the time that the EIR was certified, are determined to have a more severe adverse impact than that discussed in the underlying EIR. Section 15183(c) specifies that if an impact is not peculiar to the parcel or to the proposed project, then an EIR need not be prepared for the project solely on the basis of that impact.

This determination evaluates the potential project-specific environmental effects of the 2435-2445 16th Street project described above, and incorporates by reference information contained in the Programmatic EIR for the Eastern Neighborhoods Rezoning and Area Plans (PEIR)¹. Project-specific studies were

¹ Planning Department Case No. 2004.0160E and State Clearinghouse No. 2005032048.

prepared for the proposed project to determine if the project would result in any significant environmental impacts that were not identified in the Eastern Neighborhoods PEIR.

After several years of analysis, community outreach, and public review, the Eastern Neighborhoods PEIR was adopted in December 2008. The Eastern Neighborhoods PEIR was adopted in part to support housing development in some areas previously zoned to allow industrial uses, while preserving an adequate supply of space for existing and future production, distribution, and repair (PDR) employment and businesses. The Eastern Neighborhoods PEIR also included changes to existing height and bulk districts in some areas, including the project site at 2435-2445 16th Street.

The Planning Commission held public hearings to consider the various aspects of the proposed Eastern Neighborhoods Rezoning and Area Plans and related Planning Code and Zoning Map amendments. On August 7, 2008, the Planning Commission certified the Eastern Neighborhoods PEIR by Motion 17659 and adopted the Preferred Project for final recommendation to the Board of Supervisors.^{2,3}

In December 2008, after further public hearings, the Board of Supervisors approved and the Mayor signed the Eastern Neighborhoods Rezoning and Planning Code amendments. New zoning districts include districts that would permit PDR uses in combination with commercial uses; districts mixing residential and commercial uses and residential and PDR uses; and new residential-only districts. The districts replaced existing industrial, commercial, residential single-use, and mixed-use districts.

The Eastern Neighborhoods PEIR is a comprehensive programmatic document that presents an analysis of the environmental effects of implementation of the Eastern Neighborhoods Rezoning and Area Plans, as well as the potential impacts under several proposed alternative scenarios. The Eastern Neighborhoods Draft EIR evaluated three rezoning alternatives, two community-proposed alternatives which focused largely on the Mission District, and a “No Project” alternative. The alternative selected, or the Preferred Project, represents a combination of Options B and C. The Planning Commission adopted the Preferred Project after fully considering the environmental effects of the Preferred Project and the various scenarios discussed in the PEIR. The Eastern Neighborhoods PEIR estimated that implementation of the Eastern Neighborhoods Plan could result in approximately 7,400 to 9,900 net dwelling units and 3,200,000 to 6,600,000 square feet of net non-residential space (excluding PDR loss) built in the Plan Area throughout the lifetime of the Plan (year 2025). The Eastern Neighborhoods PEIR projected that this level of development would result in a total population increase of approximately 23,900 to 33,000 people throughout the lifetime of the plan.⁴

A major issue of discussion in the Eastern Neighborhoods rezoning process was the degree to which existing industrially-zoned land would be rezoned to primarily residential and mixed-use districts, thus reducing the availability of land traditionally used for PDR employment and businesses. Among other topics, the Eastern Neighborhoods PEIR assesses the significance of the cumulative land use effects of the rezoning by analyzing its effects on the City's ability to meet its future PDR space needs as well as its ability to meet its housing needs as expressed in the City's General Plan.

² San Francisco Planning Department. Eastern Neighborhoods Rezoning and Area Plans Final Environmental Impact Report (PEIR), Planning Department Case No. 2004.0160E, certified August 7, 2008. Available online at: <http://www.sf-planning.org/index.aspx?page=1893>, accessed August 17, 2012.

³ San Francisco Planning Department. San Francisco Planning Commission Motion 17659, August 7, 2008. Available online at: <http://www.sf-planning.org/Modules/ShowDocument.aspx?documentid=1268>, accessed August 17, 2012.

⁴ Table 2 Forecast Growth by Rezoning Option Chapter IV of the Eastern Neighborhoods Draft EIR shows projected net growth based on proposed rezoning scenarios. A baseline for existing conditions in the year 2000 was included to provide context for the scenario figures for parcels affected by the rezoning.

As a result of the Eastern Neighborhoods rezoning process, the project site has been rezoned to a UMU (Urban Mixed Use) District. The UMU District is intended to promote a vibrant mix of uses while maintaining the characteristics of this formerly industrially-zoned area. It is also intended to serve as a buffer between residential districts and PDR districts in the Eastern Neighborhoods. The proposed project and its relation to PDR land supply and cumulative land use effects is discussed further in the Community Plan Exemption (CPE) Checklist, under Land Use. The 2435-2445 16th Street site, which is located in the Mission District of the Eastern Neighborhoods, was designated as a site with building up to 68 feet in height with no bulk restrictions. Pursuant to Planning Code Section 260, the height limit for the project site is nominally 68 feet, with a maximum height of 78 feet to accommodate an elevator penthouse.

Individual projects that could occur in the future under the Eastern Neighborhoods Rezoning and Area Plans will undergo project-level environmental evaluation to determine if they would result in further impacts specific to the development proposal, the site, and the time of development, and to assess whether additional environmental review would be required. This determination concludes that the proposed project at 2435-2445 16th Street is consistent with and was encompassed within the analysis in the Eastern Neighborhoods PEIR. This determination also finds that the Eastern Neighborhoods PEIR adequately anticipated and described the impacts of the proposed 2435-2445 16th Street project, and identified the mitigation measures applicable to the 2435-2445 16th Street project. The proposed project is also consistent with the zoning controls and the provisions of the Planning Code applicable to the project site.^{5,6} Therefore, no further CEQA evaluation for the 2435-2445 16th Street project is required. In sum, the Eastern Neighborhoods PEIR and this Certificate of Exemption for the proposed project comprise the full and complete CEQA evaluation necessary for the proposed project.

PROJECT SETTING

The project site is a square 10,000-sf lot on the southeast corner of Florida and 16th Streets that gently slopes eastward towards Bryant Street. The block within which the project site resides – bounded by 16th Street to the north, Bryant Street to the east, 17th Street to the south and Florida Street to the west – is completely developed with a parking lot to the south, a cluster of eight residential dwellings to the southeast (on Bryant Street), and various other commercial and retail uses. The local vicinity is characterized by a wide variety of commercial, retail, PDR, public and residential uses. Franklin Square, a 4.5-acre park under the jurisdiction of the San Francisco Recreation and Park Department, is about 200 feet east of the project site. The Potrero Center (with a supermarket and various other retail/commercial establishments) is about 250 feet to the northeast, on the opposite side of 16th Street from the project site. There are no schools within 1,500 feet of the project site. Access to Highway 101 and Interstate 80 is about three-fifths of mile to the northwest at the on- and off-ramps located at South Van Ness Avenue and the Central Freeway. The project site is located within a quarter mile of Muni bus lines 9-San Bruno(L), 12-Folsom, 22-Fillmore, 27-Bryant, and 33-Ashbury. The project site is not within a designated historic district.

⁵ Susan Exline, San Francisco Planning Department, *Community Plan Exemption Eligibility Determination, Citywide Planning and Policy Analysis, 2435-2445 16th Street*, October 27, 2015. This document, and other cited documents, is available for review at the San Francisco Planning Department, 1650 Mission Street, Suite 400, as part of Case File No. 2014.1201E.

⁶ Jeff Joslin, *San Francisco Planning Department, Community Plan Exemption Eligibility Determination, Current Planning Analysis, 2435-2445 16th Street*, March 16, 2016.

POTENTIAL ENVIRONMENTAL EFFECTS

The Eastern Neighborhoods PEIR included analyses of environmental issues including: land use; plans and policies; visual quality and urban design; population, housing, business activity, and employment (growth inducement); transportation; noise; air quality; parks, recreation and open space; shadow; archeological resources; historic architectural resources; hazards; and other issues not addressed in the previously issued initial study for the Eastern Neighborhoods project. The proposed 2435-2445 16th Street project is in conformance with the height, use and density for the site described in the Eastern Neighborhoods PEIR and would represent a small part of the growth that was forecast for the Eastern Neighborhoods. Thus, the project analyzed in the Eastern Neighborhoods PEIR considered the incremental impacts of the proposed 2435-2445 16th Street project. As a result, the proposed project would not result in any new or substantially more severe impacts than were identified in the Eastern Neighborhoods PEIR.

Significant and unavoidable impacts were identified for the following Eastern Neighborhoods PEIR topics: land use, historic architectural resources, transportation and circulation, and shadow. As a result of the adoption of the Plan, the project site and immediate area were rezoned to UMU and a mix of uses, including residential use, was anticipated. Land use impacts were related to the cumulative loss of existing PDR space due to the implementation of the Eastern Neighborhoods Area Plan. Prior to adoption of the Plan, the project site was zoned Light Industrial (M-1) and it was included as part of the PDR land supply whose loss was considered a significant cumulative impact in the Eastern Neighborhoods PEIR. As discussed in the CPE Checklist for this project, the proposed project would not represent a significant conversion of a PDR use to a mixed residential/commercial use in comparison with that which was anticipated in the Eastern Neighborhoods PEIR. The proposed project would not result in demolition, alteration, or modification of any historic resources, or impair a historic or eligible historic district and, therefore, would not contribute to any historic resource impact. Traffic and transit ridership generated by the project would not considerably contribute to the traffic and transit impacts identified in the Eastern Neighborhoods PEIR. The proposed project would reach approximately 68 feet in height (78 feet in height including the elevator penthouse). A shadow study, discussed in the CPE Checklist for this project, determined that the proposed structure would add a maximum 0.030% annual increase in shadow as a percentage of the Theoretically Available Annual Sunlight for Franklin Square. This amount of net new shadow on Franklin Square would not result in a considerable contribution to the significant impact identified in the Eastern Neighborhoods PEIR due to the location and time of the new shadow.

The Eastern Neighborhoods PEIR identified feasible mitigation measures to address significant impacts related to noise, air quality, archeological resources, historical resources, hazardous materials, and transportation. **Table 1** below lists the mitigation measures identified in the Eastern Neighborhoods PEIR and states whether each measure would apply to the proposed project.

Table 1 – Eastern Neighborhoods PEIR Mitigation Measures

Mitigation Measure	Applicability	Compliance
F. Noise		
F-1: Construction Noise (Pile Driving)	Not Applicable: pile driving not proposed	N/A

Mitigation Measure	Applicability	Compliance
F-2: Construction Noise	Applicable: proposed project would result in temporary construction noise from use of heavy equipment.	Project Mitigation Measure 1 requires the project sponsor to develop and implement a set of noise attenuation measures during construction.
F-3: Interior Noise Levels	Not Applicable: proposed residential use is subject to Title 24; proposed retail is not a sensitive use.	N/A
F-4: Siting of Noise-Sensitive Uses	Not Applicable: Per <i>California Building Industry Association v. Bay Area Air Quality Management District</i> , CEQA does not generally require an agency to consider the effects of existing environmental conditions on a proposed project's future users or residents. ⁷	N/A. However, note that a Noise Study demonstrates that Title 24 standards could be met. ⁸
F-5: Siting of Noise-Generating Uses	Not Applicable: proposed project would not involve a noise-generating use.	N/A
F-6: Open Space in Noisy Environments	Not Applicable: Per <i>California Building Industry Association v. Bay Area Air Quality Management District</i> , CEQA does not generally require an agency to consider the effects of existing environmental conditions on a proposed project's future users or residents.	N/A. However, note that per Project Improvement Measure 1, the project sponsor should develop site-specific measures to attenuate noise in the area of the project's rooftop deck.
G. Air Quality		
G-1: Construction Air Quality	Not Applicable: Mitigation Measure G-1 has been superseded by the Construction Dust Control	Compliance with the portion of G-1 relating to construction dust will occur with compliance with the

⁷ *California Building Industry Association v. Bay Area Air Quality Management District*, December 17, 2015, Case No. S213478. Available at: <http://www.courts.ca.gov/opinions/documents/S213478.PDF>

⁸ Walsh, Norris & Associates, Inc. *Exterior Noise Evaluation 2435-2445 16th Street, San Francisco, CA*. October 7, 2014. This document, and other documents cited herein, is available for review at the San Francisco Planning Department, 1650 Mission Street, Suite 400, as part of the Case File No. 2013.1404E.

Mitigation Measure	Applicability	Compliance
	Ordinance (Health Code Article 22B). The portion of G-1 relating to diesel PM is not applicable as the project site is not within an identified Air Pollutant Exposure Zone.	Construction Dust Control Ordinance.
G-2: Air Quality for Sensitive Land Uses	Not Applicable: project site is not located within an identified Air Pollutant Exposure Zone.	N/A
G-3: Siting of Uses that Emit DPM	Not Applicable: the proposed project would not include uses that emit diesel PM.	N/A
G-4: Siting of Uses that Emit other TACs	Not Applicable: the proposed project would not include commercial, industrial or other uses that would generate toxic air contaminants.	N/A
J. Archeological Resources		
J-1: Properties with Previous Studies	Not Applicable: no archeological research design and treatment plan is on file for the project site.	N/A
J-2: Properties with no Previous Studies	Applicable: project site is located in an area with no previous archeological studies.	A Preliminary Archeological Review (PAR) prepared by Planning Department archeologists determined that the proposed project would have no effect upon archeological resources. ⁹ No further mitigation is required.
J-3: Mission Dolores Archeological District	Not Applicable: the project site is not within the Mission Dolores Archeological District.	N/A
K. Historical Resources		
K-1: Interim Procedures for Permit Review in the Eastern Neighborhoods Plan Area	Not Applicable: plan-level mitigation completed by Planning Department	N/A

⁹ Randall Dean, San Francisco Planning Department, *Environmental Planning Preliminary Archeological Review: 2435-2445 16th Street*, June 18, 2015.

Mitigation Measure	Applicability	Compliance
K-2: Amendments to Article 10 of the Planning Code Pertaining to Vertical Additions in the South End Historic District (East SoMa)	Not Applicable: plan-level mitigation completed by Planning Commission	N/A
K-3: Amendments to Article 10 of the Planning Code Pertaining to Alterations and Infill Development in the Dogpatch Historic District (Central Waterfront)	Not Applicable: plan-level mitigation completed by Planning Commission	N/A
L. Hazardous Materials		
L-1: Hazardous Building Materials	Applicable: project involves the partial demolition of a building with potentially hazardous materials.	Project Mitigation Measure 2 requires removal and disposal of any equipment containing PCBs or DEHP according to applicable federal, state, and local laws prior to the start of demolition.
E. Transportation		
E-1: Traffic Signal Installation	Not Applicable: plan level mitigation by SFMTA	N/A
E-2: Intelligent Traffic Management	Not Applicable: plan level mitigation by SFMTA	N/A
E-3: Enhanced Funding	Not Applicable: plan level mitigation by SFMTA & SFTA	N/A
E-4: Intelligent Traffic Management	Not Applicable: plan level mitigation by SFMTA & Planning Department	N/A
E-5: Enhanced Transit Funding	Not Applicable: plan level mitigation by SFMTA	N/A
E-6: Transit Corridor Improvements	Not Applicable: plan level mitigation by SFMTA	N/A
E-7: Transit Accessibility	Not Applicable: plan level mitigation by SFMTA	N/A
E-8: Muni Storage and Maintenance	Not Applicable: plan level mitigation by SFMTA	N/A
E-9: Rider Improvements	Not Applicable: plan level mitigation by SFMTA	N/A

Mitigation Measure	Applicability	Compliance
E-10: Transit Enhancement	Not Applicable: plan level mitigation by SFMTA	N/A
E-11: Transportation Demand Management	Not Applicable: plan level mitigation by SFMTA	N/A

Please see the attached Mitigation Monitoring and Reporting Program (MMRP) for the complete text of the applicable mitigation measures. With implementation of these mitigation measures the proposed project would not result in significant impacts beyond those analyzed in the PEIR.

PUBLIC NOTICE AND COMMENT

A “Notification of Project Receiving Environmental Review” was mailed on October 14, 2015 to adjacent occupants and owners of properties within 300 feet of the project site. The comment period was from October 16 to November 2, 2015. No comments were received.

CONCLUSION

As summarized above and further discussed in the CPE Checklist¹⁰:

1. The proposed project is consistent with the development density established for the project site in the Eastern Neighborhoods Rezoning and Area Plans;
2. The proposed project would not result in effects on the environment that are peculiar to the project or the project site that were not identified as significant effects in the Eastern Neighborhoods PEIR;
3. The proposed project would not result in potentially significant off-site or cumulative impacts that were not identified in the Eastern Neighborhoods PEIR;
4. The proposed project would not result in significant effects, which, as a result of substantial new information that was not known at the time the Eastern Neighborhoods PEIR was certified, would be more severe than were already analyzed and disclosed in the PEIR; and
5. The project sponsor will undertake feasible mitigation measures specified in the Eastern Neighborhoods PEIR to mitigate project-related significant impacts.

Therefore, the proposed project is exempt from further environmental review pursuant to Public Resources Code Section 21083.3 and CEQA Guidelines Section 15183.

¹⁰ The CPE Checklist is available for review at the Planning Department, 1650 Mission Street, Suite 400, San Francisco, in Case File No. 2014.1201E.

EXHIBIT C: MITIGATION MONITORING AND REPORTING PROGRAM AND IMPROVEMENT MEASURE

Adopted Mitigation Measures	MONITORING AND REPORTING PROGRAM			
	Responsibility for Implementation	Mitigation Schedule	Monitoring/ Reporting Responsibility	Monitoring Schedule
<p><u>Project Mitigation Measure 1 - Construction Noise (Eastern Neighborhoods PEIR Mitigation Measure F-2).</u></p> <p>The project sponsor shall develop a set of site-specific noise attenuation measures under the supervision of a qualified acoustical consultant. Prior to commencing construction, a plan for such measures shall be submitted to the Department of Building Inspection to ensure that maximum feasible noise attenuation will be achieved. These attenuation measures shall include as many of the following control strategies as feasible:</p> <ul style="list-style-type: none"> • Erect temporary plywood noise barriers around a construction site, particularly where a site adjoins noise-sensitive uses; • Utilize noise control blankets on a building structure as the building is erected to reduce noise emission from the site; • Evaluate the feasibility of noise control at the receivers by temporarily improving the noise reduction capability of adjacent buildings housing sensitive uses; • Monitor the effectiveness of noise attenuation measures by taking noise measurements; and • Post signs on-site pertaining to permitted construction days and hours and complaint 	Project Sponsor and Contractor	During construction	Project Sponsor to provide Planning Department with monthly reports during construction period.	Considered complete upon receipt of final monitoring report at completion of construction.

MONITORING AND REPORTING PROGRAM

Adopted Mitigation Measures	Responsibility for Implementation	Mitigation Schedule	Monitoring/ Reporting Responsibility	Monitoring Schedule
<p>procedures and who to notify in the event of a problem, with telephone numbers listed.</p>				
<p><u>Project Mitigation Measure 2 - Hazardous Building Materials (Eastern Neighborhoods Mitigation Measure L-1).</u> In order to minimize impacts to public and construction worker health and safety during demolition of the existing structure, the sponsor shall ensure that any equipment or fixtures containing PCBs or DEPH, such as fluorescent light ballasts, are removed and property disposed of according to applicable federal, state, and local laws prior to the start of renovation, and that any florescent light tubes, which could contain mercury, are similarly removed and properly disposed of. Any other hazardous materials identified, either before or during work, shall be abated according to applicable federal, state, and local laws.</p>	<p>Planning Department and DPH</p>	<p>Prior to approval of project.</p>	<p>Planning Department, in consultation with DPH; where Site Mitigation Plan is required, Project Sponsor or contractor shall submit a monitoring report to DPH, with a copy to Planning Department and DBI, at end of construction.</p>	<p>Considered complete upon receipt of final monitoring report at completion of construction.</p>
<p align="center">Improvement Measure</p> <p><u>Project Improvement Measure 1 – Reduce Noise on Rooftop Deck.</u> While the proposed project would not result in any significant noise impact to the users of the rooftop deck, the project sponsor should encourage development of a set of site-specific noise attenuation measures under the supervision of a qualified acoustical consultant. Prior to commencing construction, a plan for such measures should be submitted to the Planning Department to ensure that maximum feasible noise attenuation for users of the outdoor deck areas will be</p>	<p align="center">Responsibility for Implementation</p> <p>Project Sponsor and Architect</p>	<p align="center">Improvement Schedule</p> <p>Design measures to be incorporated into project design and evaluated in environmental/building permit review</p>	<p align="center">Monitoring/Reporting Responsibility</p> <p>Planning Department and Department of Building Inspection</p>	<p align="center">Monitoring Schedule</p> <p>Considered complete upon approval of final construction drawing set.</p>

MONITORING AND REPORTING PROGRAM

Adopted Mitigation Measures	Responsibility for Implementation	Mitigation Schedule	Monitoring/ Reporting Responsibility	Monitoring Schedule
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achieved. As determined feasible by the qualified acoustical consultant, these attenuation measures may include construction of noise barriers between noise sources and open space, consistent with other principles of urban design.