



SAN FRANCISCO PLANNING DEPARTMENT

MEMO

Notice of Electronic Transmittal

Planning Department Response to the Appeal of the Final Mitigated Negative Declaration (FMND) for the 110 The Embarcadero/115 Steuart Street Project

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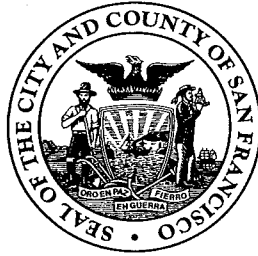
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DATE: January 16, 2015
TO: Angela Calvillo, Clerk of the Board of Supervisors
FROM: Sarah B. Jones, Environmental Review Officer – (415) 575-9034
Kansai Uchida, Case Planner – (415) 575-9048
RE: BOS File No. 141320 [Case No. 2011.1388E]
Appeal of FMND for the 110 The Embarcadero/115 Steuart
Street Project
HEARING DATE: January 27, 2015

In compliance with San Francisco's Administrative Code Section 8.12.5 "Electronic Distribution of Multi-Page Documents," the Planning Department submits a multi-page response to the Appeal of FMND for the 110 The Embarcadero/115 Steuart Street Project [BF 141320] in digital format (attached). A hard copy of the response is available from the Clerk of the Board. Additional hard copies may be requested by contacting Kansai Uchida of the Planning Department at 415-575-9048.


BOARD of SUPERVISORS



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Dr. Carlton B. Goodlett Place, Room 244
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Tel. No. 554-5184
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December 16, 2014

To: John Rahaim
Planning Director

From:  Angela Calvillo
Clerk of the Board of Supervisors

Subject: Appeal of the Mitigated Negative Declaration – 110 The Embarcadero

An appeal of the Mitigated Negative Declaration for 110 The Embarcadero was filed with the Office of the Clerk of the Board on December 15, 2014, by David Osgood, on behalf of the Rincon Point Neighbors Association.

Pursuant to Administrative Code, Chapter 31.16, I am forwarding this appeal, with attached documents, to the Planning Department's Office to determine if the appeal has been filed in a timely manner. The Planning Department's determination should be made within three (3) working days of receipt of this request.

If you have any questions, please feel free to contact Legislative Deputy, Rick Caldeira at (415) 554-7711, or Legislative Clerks, Joy Lamug at (415) 554-7712, or John Carroll at (415) 554-4445.

c: Jon Givner, Deputy City Attorney
Kate Stacy, Deputy City Attorney
Marlena Byrne, Deputy City Attorney
Scott Sanchez, Zoning Administrator, Planning Department
Sarah Jones, Environmental Review Officer, Planning Department
AnMarie Rodgers, Planning Department
Aaron Starr, Planning Department
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Rincon Point Neighbors Association

88 Howard Street
Post Office Box 193015
San Francisco, CA 94119

December 13, 2014

Angela Calvillo
Clerk of the Board of Supervisors
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San Francisco, CA 94102

RECEIVED
BOARD OF SUPERVISORS
SAN FRANCISCO
2014 DEC 15 PM 4:53
RP

Re: Appeal of Mitigated Negative Declaration, 110 The Embarcadero (2011.1388E)

Via email and USPS Priority Mail

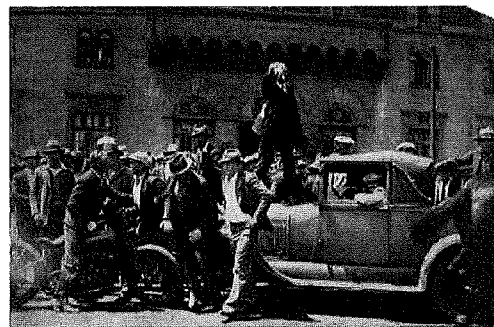
Dear Ms Calvillo:

The Rincon Point Neighbors Association, with the support of numerous individuals and approximately 20 community groups, hereby appeals the Planning Commission's denial of its appeal of the Mitigated Negative Declaration (MND) for the proposed project at 110 The Embarcadero. This proposal amounts to the destruction of one of the city's most historic buildings and one of the most important union-related buildings on the west coast. The ILWU unanimously called for landmarking this building at its 34th International Convention in Seattle.

Testimony shows that this project should have received an Environmental Impact Report. Historical issues have been glossed over and ignored. The building is eligible for listing on the California Register under Criterion A, association with important events, for its direct association with the 1934 waterfront and general strikes in San Francisco. The building was the headquarters of the International Longshoremen's Association (ILA) and its leader, Harry Bridges, during the 1934 longshoremen's strike. It was the site of one of the slayings on "Bloody Thursday," and was the location where the bodies of the slain men lay in state.

HISTORY IGNORED:

The Commonwealth Club and Planning Department are attempting to re-write history by ignoring the association of the building with the considerable contributions of the union and the leadership of Harry Bridges. They have the gall to state none of the building's occupants appear "to have made a significant contribution to local, state, or national history" (page 25, PMND). They have declared Harry Bridges was not present at the 1934 strike committee (which he led) or at the union local (where his leadership was consolidated during the 1934 strike). The historic



Embarcadero side of the YMCA

evidence overwhelmingly indicates this building was Harry Bridges' headquarters during the strike. This makes the building eligible for listing in the California Register under Criterion 2 (persons) and requires the building to be preserved. The Planning Department and Commonwealth Club do not want this historic building preserved. That is why they are re-writing history. Of course it was the city's powerful elite (mayor, downtown business interests, and the wealthy) who opposed the union in 1934. Today, their counterparts are still downplaying the union and Mr. Bridges by supporting the Commonwealth Club's plans.

History was made on the Embarcadero, but the Commonwealth Club would remove ALL character-defining features of the building's Embarcadero façade. The MND tries to excuse this by arbitrarily claiming "the significance of the property under Criterion 1 is most closely tied to the Steuart Street façade." That is nonsensical and there is no basis for this proclamation. The Commonwealth Club bought one building, not two. The slain men lay in state inside the building. The building (not the façade) was headquarters of the union during the strike. On Bloody Thursday the SFPD shot gas canisters through the windows on both sides of this building. Harry Bridges obviously worked at the headquarters of the union he headed which was housed inside the building. The claim that only the Steuart Street façade is significant is absurd. This seems to be based on a photograph of preparations of the slain men's funeral procession down Market Street. The great historic events focus on the strike, most of which took place on the Embarcadero. The personal leadership for these events emanated from this building.

In any event, the façade being proposed for the Steuart Street side would not be an accurate restoration anyway. The most visible first floor is completely different from 1934, and the newly inserted third floor would be visible and too close to the existing façade (set back only six- to eight-feet).

DESIGN CONCERNS:

This historic Classical Revival building has handsome columns flanking five large windows. It is the same design on both sides of the building. Though poorly painted at this time, the historic design needs to be maintained to stay in sync with the rest of the block.

The MND is incorrect when it states a new modern glass curtain wall "would not have a significant impact upon the existing character of the Project's vicinity."



This is the last block in the city of mostly 100-year old buildings on the waterfront. It deserves to become a historic district. It is even more important because it faces the open waterfront. One building on the block survived the earthquake and fire and still exists at the north end (the Audiffred Building). Most maintain much of their ornamentation, such as the YMCA. The rest of the buildings were designed with a dignified, classic look including the streamline moderne (a style developed in the 1930s) office building at the south end of the block. None have the uninteresting glass curtain wall appearance that the club is proposing. (Most world-class cities would protect a block of buildings on the water. For example, London, Paris, Florence, St. Petersburg, Amsterdam (right) and other great cities would require them to be either preserved or designed to maintain the historic look.)



EARLIER BOARD FINDINGS:

It should be noted that the San Francisco Board of Supervisors found on March 31, 2009 that some of these same issues were significant at this location. Their motion stated the following about this existing building:

- “There is substantial evidence that the existing building at 110 The Embarcadero, which also fronts 113-115 Steuart Street, is an historical resource.”
- “...there is substantial evidence in the record that the building retains integrity...”
- “...the building remains in its original location, the historic Audiffred Building remains next door and five of the buildings in the vicinity visible from a 1934 photograph still stand, resulting in a blockface the retains integrity. The massing and scale of the building, the shaped parapet with coping and the stucco cladding of the building remain the same as they were in 1934. Bradley Wiedmaier states that the second floor window opening dimension, the number of openings, the depth of the glazing from the wall surface and framing remain the same.”
- “...alterations (already made) to the façade details mentioned by Page and Turnbull are largely reversible.”
- “Given the substantial evidence in the record to support a determination that the building is an historical resource because it retains integrity associated with important historic events, there is a fair argument that the project, which proposed the demolition of the resource, may result in a substantial adverse change in the significance of an historical resource requiring the preparation of an EIR.”
- “Planning Department staff found the project inconsistent with Planning Code Section 101.1(b)(2), which calls for conserving and protecting ... neighborhood character.”
- “Written and oral testimony presented at the hearing identified the potentially significant impact on birds flying into the “mostly glass” walls...”

There is no reason demolition of the east façade of the building which faces the heavily traveled (pedestrian, bike, auto, streetcar) Embarcadero should be allowed now.

Members of the Rincon Point Neighbors Association and the Rincon Center Tenants Association have been actively tracking neighborhood projects since the 1990s. Residents have testified about the over-development of Rincon Park, the loss of the city's 125-year-old transit terminal in front of the Ferry Building, the proposal for 75 Howard that would be nearly 50% over the height limit, and the rejected Hines project previously proposed for 110 The Embarcadero.

Sincerely,

A handwritten signature in cursive script, appearing to read "Dave", written in black ink.

David Osgood
President

Cc: Environmental Review Officer

Enclosures



SAN FRANCISCO PLANNING DEPARTMENT

Subject to: (Select only if applicable)

- Affordable Housing (Sec. 415)
- Jobs Housing Linkage Program (Sec. 413)
- Downtown Park Fee (Sec. 412)
- First Source Hiring (Admin. Code)
- Child Care Requirement (Sec. 414)
- Other

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Planning Commission Motion No. 19277

HEARING DATE: NOVEMBER 13, 2014

Hearing Date: November 13, 2014
Filing Date: October 8, 2014
Case No.: **2011.1388EX**
Project Address: **110 THE EMBARCADERO/115 STEUART STREET**
Zoning: C-3-O (Downtown Office)
 84-X Height and Bulk District
Block/Lot: 3715/002
Applicant: Piper Kujac
 The Commonwealth Club of California
 595 Market Street, 2nd Floor
 San Francisco, CA 94105
Staff Contact: Pilar LaValley - (415) 575-9084
pilar.lavalley@sfgov.org

ADOPTING FINDINGS RELATED TO THE APPROVAL OF A SECTION 309 REVIEW, PURSUANT TO A REQUEST FOR HEARING OF A PROPOSED ADMINISTRATIVE APPROVAL UNDER PLANNING CODE SECTIONS 309(d) AND (g), FOR CONSTRUCTION OF A ONE-STORY VERTICAL ADDITION, ROOF DECK, AND CIRCULATION PENTHOUSE TO THE EXISTING TWO-STORY-OVER BASEMENT BUILDING, REPLACEMENT OF THE EMBARCADERO FAÇADE AND RESTORATION OF THE STEUART STREET FAÇADE, AND REHABILITATION OF THE BUILDING FOR ASSEMBLY AND ACCESSORY OFFICE USE, AT 110 THE EMBARCADERO/115 STEUART STREET (ASSESSOR'S BLOCK 3715, LOT 002), LOCATED WITHIN A C-3-O (DOWNTOWN OFFICE) DISTRICT AND 84-X HEIGHT AND BULK DISTRICT, AND ADOPTING FINDINGS UNDER THE CALIFORNIA ENVIRONMENTAL QUALITY ACT.

PREAMBLE

On August 1, 2013, Piper Kujac of the Commonwealth Club of California ("Project Sponsor"), filed Environmental Evaluation Application No. 2011.1388E with the Planning Department ("Department"), and on December 17, 2013, filed Building Permit Application No. 2013.12.17.4360 with the Department of Building Inspection, for construction of a one-story vertical addition, roof-deck, and circulation penthouse to the existing two-story-over basement building, replacement of the Embarcadero façade and restoration

of the Steuart Street façade, and rehabilitation of the building for assembly and accessory office use for the Commonwealth Club of California, at 110 The Embarcadero/115 Steuart Street, Lot 002 in Assessor's Block 3715, within the C-3-O Zoning District and the 84-X Height and Bulk District ("Project").

On June 25, 2014, a Draft Initial Study/Mitigated Negative Declaration (IS/MND) for the Project was prepared and published for public review; and

The Draft IS/MND was available for public comment until July 15, 2014; and

On July 14, 2014, an appeal of the Mitigated Negative Declaration was filed with the Department.

On September 18, 2014, the Commission conducted a duly noticed public hearing at a regularly scheduled meeting on the Appeal of the Mitigated Negative Declaration, 2011.1388E.

On September 18, 2014, the Commission voted unanimously to uphold the IS/MND and approved the issuance of the Final Mitigated Negative Declaration (FMND) as prepared by the Planning Department in compliance with CEQA, the State CEQA Guidelines and Chapter 31.

On September 30, 2014, the Planning Department issued the Final Mitigated Negative Declaration (FMND) and found that the contents of said report and the procedures through which the FMND was prepared, publicized, and reviewed complied with the California Environmental Quality Act (California Public Resources Code Sections 21000 et seq.) (CEQA), Title 14 California Code of Regulations Sections 15000 et seq. (the "CEQA Guidelines") and Chapter 31 of the San Francisco Administrative Code ("Chapter 31"); and

The Planning Department found the FMND was adequate, accurate and objective, reflected the independent analysis and judgment of the Planning Department and the Planning Commission, and approved the FMND for the Project in compliance with CEQA, the CEQA Guidelines and Chapter 31.

The Planning Department is the custodian of records, located in the File for Case No. 2011.1388E, at 1650 Mission Street, Fourth Floor, San Francisco, California.

Planning Department staff prepared a Mitigation Monitoring and Reporting program (MMRP), contained in Exhibit C, which material was made available to the public and this Commission for this Commission's review, consideration and action.

On September 25, 2014, the Department issued a Notice of Building Permit Application (Section 309) indicating that the project described in Building Permit Application No. 2013.12.17.4360 qualified for administrative approval under Planning Code Section 309(d) and providing required notice of such approval. The project qualifies for administrative approval as it requires no design modifications and no exceptions from Planning Code requirements.

On October 3, 2014, within the 10-day notice period outlined in Planning Code Section 309(d), the Department received a Request for Hearing of the proposed administrative approval of Building Permit No. 2013.12.17.4360 from David Osgood of Rincon Point Neighbors Association. The Request for Hearing

does not specify modifications to the project that the Planning Commission should impose nor does it allege that the project is not in compliance with the open space and streetscape requirements of the Planning Code.

On October 8, 2014, Piper Kujac of the Commonwealth Club of California ("Project Sponsor"), filed Downtown Project Authorization Application No. 2011.1388X per Planning Code Sections 309(d) and (g) with the Department.

On November 13, 2014, the Commission conducted a duly noticed public hearing at a regularly scheduled meeting on Case No. 2011.1388EX.

The Commission has heard and considered the testimony presented to it at the public hearing and has further considered written materials and oral testimony presented on behalf of the applicant, Department staff, and other interested parties.

MOVED, that the Commission hereby grants the Section 309 approval (Downtown Project Authorization) requested in Application No. 2011.1388EX, subject to the conditions contained in "EXHIBIT A" of this motion, based on the following findings:

FINDINGS

Having reviewed the materials identified in the preamble above, and having heard all testimony and arguments, this Commission finds, concludes, and determines as follows:

1. The above recitals are accurate and constitute findings of this Commission.
2. **Site Description and Present Use.** The project site, at 110 The Embarcadero/115 Steuart Street (Assessor's Block 3715, Lot 002), is a through lot on the west side of The Embarcadero and the east side of Steuart Street. The site is within the block bounded by The Embarcadero, Mission Street, Steuart Street, and Howard Street in the Financial District. The property is located within a C-3-O (Downtown Office) Zoning District with an 84-X Height and Bulk District. The project site presently contains a vacant, two-story-over-basement, 19,374-square-foot (sf), wood-frame commercial building constructed circa 1910.
3. **Surrounding Properties and Neighborhood.** The project site is located along The Embarcadero, the primary transportation corridor along San Francisco's bay frontage, at the eastern edge of the Financial District. This segment of The Embarcadero is characterized by expansive plazas, a wide boulevard configuration, median-running streetcar tracks, and waterfront-oriented pedestrian spaces. The project site is approximately one block south of Market Street, Justin Herman Plaza and the plazas surrounding the Ferry Building. Other adjacent land uses include office, residential, and hotel buildings, most of which have ground floor retail and service spaces. The site is within 2 ½ blocks of several major regional transit hubs, including the Embarcadero Bay Area Rapid Transit (BART)/San Francisco Municipal Railway (Muni) station, the Ferry Building, and the Temporary Transbay Terminal. The terrain of the area is largely level, due to its location on artificial fill.

On the subject block, none of the buildings are taller than eight stories, given the 84-foot height district. This height is typical of the adjacent blocks along The Embarcadero, though blocks on the west side of Steuart Street contain high-rise buildings. Nearby street-fronting businesses include restaurants, hotels, and other office and tourist-serving establishments. Residential developments are also present along The Embarcadero on blocks to the north and south of the project site.

The project site is next to the Audiffred Building, located on the south side of Mission Street between Steuart Street and The Embarcadero, which directly adjoins the northern wall of the existing project site building. The Audiffred Building was built in 1889, survived the 1906 earthquake and fire, and is designated as a historic landmark (San Francisco Landmark #7). Like the existing building at 110 The Embarcadero, it also played a central role in the 1934 Longshoreman's Strike. Other nearby historic resources include the Rincon Annex United States Post Office (180 Steuart Street), the YMCA Building (169 Steuart Street), and the Agriculture Building (101 The Embarcadero).

4. **Project Description.** The proposed project would involve interior improvements, rehabilitation, and the vertical addition of a third story, circulation penthouse, and roof deck to the existing building for use as offices and assembly functions for the Commonwealth Club of California, which would move from its current 595 Market Street location. As a result of the proposed project, the building would have 23,819 sf of floor space, of which 11,964 sf would be for assembly/circulation use, 6,770 sf would be for storage, and 5,085 would be for office use. The net addition to the building would total 4,445 sf. The total height of the building from street level to the top of the finish roof would be 51'-1" (62'-10" including rooftop features normally exempt from height calculations). The overall shell of the existing building would be retained and it would remain a through lot with exposed facades on The Embarcadero and Steuart Street. The cladding materials of the Embarcadero façade would be removed. The project would preserve the Steuart Street façade, which is associated with the significant historic events of 1934. The new third story would be set back between 6'-8" (at the south side of the building) and 11'-6" (at the north side of the building) from the Steuart Street frontage as part of the façade preservation. The proposed project would also include a plaque on the exterior of the Steuart Street façade dedicated to the labor history that occurred along Steuart Street in 1934. In the building, the Commonwealth Club would specifically curate historic archival materials related to labor events in 1934, including the building's association with the 1934 Longshoreman's Strike.
5. **Public Comment.** To date, the Department has received one comment in opposition to the project and the Project Sponsor has provided 20 letters in support of the project to the Department. These comment letters are contained in the attached Project Sponsor submittal.
6. **Planning Code Compliance:** The Commission finds that the Project is consistent with the relevant provisions of the Planning Code in the following manner:
 - A. **Floor Area Ratio (Section 124).** Section 124 establishes basic floor area ratios (FAR) for all zoning districts. As set forth in Section 124(a), the FAR for the C-3-O District is 9.0 to 1.

The Project Site has an area of approximately 6,297.5 square feet, thus the maximum development of the Property pursuant to Section 124 is 56,677.5 square feet of gross area. The project proposes a total

of approximately 24,908 gross square feet, or a FAR of approximately 4.3 to 1. Therefore, the Project complies with the FAR limitations of Section 124.

- B. **Section 134: Rear Yard.** Section 134 establishes minimum required rear yards in all zoning districts. The rear yard is a function of lot depth. Section 134(a)(1)(C) states that in C-3 Districts, "rear yards shall be provided at the lowest story containing a dwelling unit and at each succeeding level or story of the building."

The Project does not propose any dwelling units, and thus Section 134 does not apply.

- C. **Non-Residential Open Space (Section 138).** Planning Code Section 138 requires usable open space for uses other than dwelling units, except "institutional" uses, and uses in a predominantly retail building, in C-3 Districts where there is a proposal to construct a new building or an addition of gross floor area equal to 20 percent or more of an existing building.

The Project proposes assembly and accessory office use for the Commonwealth Club of California, which is an "institutional" use as defined by Planning Code Section 217(d) as a "Social service or philanthropic facility providing assistance of a charitable or public service nature." Therefore, no open space is required although the project will provide 227 sf of publicly accessible open space at building setback areas fronting on both The Embarcadero and Stuart Street.

- D. **Streetscape Improvements (Section 138.1).** Planning Code Section 138.1 requires that in any District, street trees shall be required under the following conditions: construction of a new building; relocation of a building; the addition of gross floor area equal to 20 percent or more of the gross floor area of an existing building; the addition of a new dwelling unit, a garage, or additional parking; or paving or repaving more than 200 square feet of the front setback. Each street tree must be a minimum of 24-inch box size for each 20 feet of frontage of the property along each street or public alley. Under Section 138.1(c), the Commission may also require the Project Sponsor to install additional sidewalk improvements such as lighting, special paving, seating and landscaping in accordance with the guidelines of the Downtown Streetscape Plan if it finds that these improvements are necessary to meet the goals and objectives of the General Plan.

The Project will include retention and replacement of required street trees on both The Embarcadero and Stuart Street elevations. Where installation of one replacement street tree is not feasible, an in lieu fee will be paid. Due to the size and nature of the project, no additional streetscape improvements pursuant to Planning Code Section 138.1(c) are required. The project complies with all open space and streetscape requirements.

- E. **Section 146: Shadows on Public Sidewalks.** In order to maintain direct sunlight on public sidewalks in certain downtown areas during critical use periods, Section 146(a) requires new structures to avoid penetrating a sun access plane defined by an angle sloping away from the street above a stipulated height at the property line as set forth in Table 146 on properties that are located along streets. Section 146(c) requires new buildings and additions to existing buildings in C-3 Districts to be shaped, if it can be done without creating an unattractive design and without unduly restricting the development potential of the site in question, to

reduce substantial shadow impacts on public sidewalks other than those protected by Section 146(a).

The Embarcadero and Steuart Street are not among the streets regulated by Section 146(a), and Section 146(a) sun access plane requirements do not apply.

The Department concluded in its Mitigated Negative Declaration that the Project-generated shadows would be minor relative to shadow currently generated by existing buildings in the vicinity. The shadows cast by the Project would not increase the total amount of shading in the neighborhood above levels that are common and generally accepted in urban areas. In sum, the Department's environmental review concluded that the shadows cast by the Project on public sidewalks would not be considered substantial, and thus the Project complies with Section 146(c) requirements.

- F. **Shadow (Section 147).** Planning Code Section 147 requires reduction of substantial shadow impacts on public plazas and other publicly accessible spaces other than those protected under Planning Code Section 295. Section 295 restricts new shadow, cast by structures exceeding a height of 40 feet, upon property under the jurisdiction of the Recreation and Park Commission.

The Shadow Analysis conducted for the Project indicates that the Project will not cast shadow upon Public, Publicly Accessible or Publicly Financed or Subsidized Open Space.

- G. **Section 148: Ground-Level Wind Currents, Exceptions From.** In C-3 Districts, buildings and additions to existing buildings shall be shaped, or other wind-baffling measures shall be adopted, so that the developments will not cause ground-level wind currents to exceed more than 10 percent of the time year round, between 7:00 a.m. and 6:00 p.m., the comfort level of 11 miles per hour equivalent wind speed in areas of substantial pedestrian use and seven miles per hour equivalent wind speed in public seating areas.

When preexisting ambient wind speeds exceed the comfort level, or when a proposed building or addition may cause ambient wind speeds to exceed the comfort level, the building shall be designed to reduce the ambient wind speeds to meet the requirements. An exception may be granted, in accordance with the provisions of Section 309, allowing the building or addition to add to the amount of time that the comfort level is exceeded by the least practical amount if (1) it can be shown that a building or addition cannot be shaped and other wind-baffling measures cannot be adopted to meet the foregoing requirements without creating an unattractive and ungainly building form and without unduly restricting the development potential of the building site in question, and (2) it is concluded that, because of the limited amount by which the comfort level is exceeded, the limited location in which the comfort level is exceeded, or the limited time during which the comfort level is exceeded, the addition is insubstantial.

Section 309(a)(2) permits exceptions from the Section 148 ground-level wind current requirements. No exception shall be granted and no building or addition shall be permitted that causes equivalent wind speeds to reach or exceed the hazard level of 26 miles per hour for a single hour of the year.

The Department concluded in its Mitigated Negative Declaration that the Project-generated wind would be minor relative to wind currently generated by the existing building and surrounding

buildings in the vicinity. Existing buildings on the same block as the project site are between two and eight stories in height, and surrounding blocks contain high-rise buildings. The existing building on the project site is 35 feet tall. The proposed project would add a third story to the existing building. The total height of the building with the proposed addition would be 51'-1" (62'-10" including parapets, rooftop access, and mechanical equipment). This addition would result in a minor addition to an existing building, and the buildings in the project vicinity are of similar height or taller, so the proposed project would not be expected to substantially increase ground-level winds. Thus, the proposed project would result in a less-than-significant wind impact; no exception for wind is being sought or is required.

- H. **Parking (Section 151.1).** Pursuant to Planning Code Section 151.1, no off-street parking is required for uses in C-3 Districts.

The existing building contains no parking and the Project proposes no new parking spaces.

- I. **Section 152.1: Loading.** Planning Code Section 152.1 establishes minimum requirements for off-street loading. In C-3 Districts, the loading requirement is based on the total gross floor area of the structure or use. Table 152.1 requires no off-street freight loading spaces to be provided for an assembly use that is less than 100,000 square feet in area.

With 18,353 gross square feet of assembly use, the Project is not required to provide any loading spaces. The Project does not provide any loading spaces, and thus complies with this requirement.

- B. **Height (Section 260(b)(1)(G)).** The project site is located in an 84-X Height and Bulk district.

The height of the new finished roof would be 51.5-feet, and the absolute height, including mechanical and elevator penthouse, would be 62-feet. As proposed, the project is well under the height and bulk limit of the 84-X district.

7. **Design Review.** Planning Code Section 309 lists ten aspects of design review in which a project must comply; the Planning Commission finds that the project is compliant with these nine aspects and does not require modifications as follows:

The proposed design, including the glass curtain wall facing The Embarcadero and the vertical addition, has been carefully reviewed by preservation staff in preparation of the Historic Resource Evaluation Report (HRER) and Final Mitigated Negative Declaration (FMND) and by the Department's Urban Design Team, and found to be compatible with the historic resource and the mixed architectural character of the surrounding block. The glass curtain wall will comply with all requirements of Title 24 and the Building Code, both of which are the purview of the Department of Building Inspection.

The Department recommends no design modifications to the proposed project as it appears to respect the proportion, scale, setbacks, materials, and parapet and fenestration treatment of the buildings on the surrounding block. The Project is not anticipated to negatively affect sidewalk shading or ground-level winds, and the height of the Project is consistent with surrounding buildings and the predominant streetwall. The Project has been designed to encourage pedestrian circulation and incorporates open space and streetscape features as required. No design modifications are proposed or required.

8. **General Plan Compliance.** The Project is, on balance, consistent with the following Objectives and Policies of the General Plan:

URBAN DESIGN ELEMENT

OBJECTIVE 3:

MODERATION OF MAJOR NEW DEVELOPMENT TO COMPLEMENT THE CITY PATTERN, THE RESOURCES TO BE CONSERVED, AND THE NEIGHBORHOOD ENVIRONMENT.

Policy 3.1: Promote harmony in the visual relationships and transitions between new and older buildings.

Policy 3.6: Relate the bulk of buildings to the prevailing scale of development to avoid an overwhelming or dominating appearance in new construction.

The Project vicinity consists of a variety of building designs and scales. The Project has been designed to complement the existing development and neighborhood

DOWNTOWN PLAN ELEMENT

OBJECTIVE 13 (URBAN FORM):

CREATE AN URBAN FORM FOR DOWNTOWN THAT ENHANCES SAN FRANCISCO'S STATURE AS ONE OF THE WORLD'S MOST VISUALLY ATTRACTIVE CITIES.

Policy 13.1:

Relate the height of buildings to important attributes of the city pattern and to the height and character of existing and proposed development.

The Project vicinity consists of a variety of building designs and scales. The Project has been designed to complement the existing development and neighborhood

TRANSPORTATION ELEMENT

Objectives and Policies

The Transportation Element of the General Plan contains the following relevant objectives and policies:

OBJECTIVE 2:

USE THE TRANSPORTATION SYSTEM AS A MEANS FOR GUIDING DEVELOPMENT AND IMPROVING THE ENVIRONMENT.

Policy 2.1:

Use rapid transit and other transportation improvements in the city and region as the catalyst for desirable development, and coordinate new facilities with public and private development.

The Project is located within an existing high-density urban context. The Downtown Core has a multitude of transportation options, and the Project Site is within walking distance of the Market Street transit spine. The Project would make good use of the existing and planned transit services available in this area. The Project proposes no off-street parking, encouraging tenants and patrons to seek transportation options other than private automobile use.

9. **Priority Policy Findings.** Section 101.1(b) establishes eight priority planning policies and requires the review of permits for consistency with said policies. The Project complies with these policies, on balance, as follows:

- A) The existing neighborhood-serving retail uses will be preserved and enhanced and future opportunities for resident employment in and ownership of such businesses will be enhanced:

The proposed project will not have any impact on neighborhood serving retail uses. The Project Site does not currently contain any retail uses, and none will be displaced by the Project.

- B) The existing housing and neighborhood character will be conserved and protected in order to preserve the cultural and economic diversity of our neighborhoods:

The Site does not currently contain any residential use, and thus the Project has no impact on the amount of existing housing.

- C) The City's supply of affordable housing will be preserved and enhanced:

The project will not reduce the affordable housing supply.

- D) The commuter traffic will not impede MUNI transit service or overburden our streets or neighborhood parking:

The proposed project will not result in commuter traffic impeding MUNI transit service or overburdening the streets or neighborhood parking. The Project Site is situated in the downtown core and is well served by public transit. The Project Site is located just one block from Market Street, a major transit corridor that provides access to various Muni and BART lines.

- E) A diverse economic base will be maintained by protecting our industrial and service sectors from displacement due to commercial office development. And future opportunities for resident employment and ownership in these sectors will be enhanced:

The Project Site does not contain any industrial or service sector uses, and thus none will be displaced by the Project. The proposal will retain a mix of uses including office, and assembly uses, contributing to the diverse economic base of downtown.

- F) The City will achieve the greatest possible preparedness to protect against injury and loss of life in an earthquake.

Preparedness against injury and loss of life in an earthquake is improved by the proposed work. The work will eliminate unsafe conditions at the site and all construction will be executed in compliance with all applicable construction and safety measures.

G) That landmark and historic buildings will be preserved:

The existing building is considered a historic resource and the significant character-defining features of the Steuart Street façade will be preserved and restored as documented in the Mitigated Negative Declaration.

H) Parks and open space and their access to sunlight and vistas will be protected from development:

The proposed project will not impact the access to sunlight or vistas for parks and open space.

10. The Project is consistent with and would promote the general and specific purposes of the Code provided under Section 101.1(b) in that, as designed, the Project would contribute to the character and stability of the neighborhood and would constitute a beneficial development.
11. The Commission hereby finds that approval of the Section 309 Downtown Project Authorization would promote the health, safety, and welfare of the City.

DECISION

That based upon the Record, the submissions by the Applicant, the staff of the Department and other interested parties, the oral testimony presented to this Commission at the public hearings, and all other written materials submitted by all parties, the Commission hereby **APPROVES** Application No. 2011.1388EX pursuant to Section 309, subject to the following conditions attached hereto as Exhibit A which are incorporated herein by reference as though fully set forth, in general conformance with the plans stamped Exhibit B and on file in Case Docket No. 2011.1388EX.

The Planning Commission has reviewed and considered the IS/MND and the record as a whole and finds that there is no substantial evidence that the Project will have a significant effect on the environment with the adoption of the mitigation measures contained in the MMRP to avoid potentially significant environmental effects associated with the Project, and hereby adopts the FMND.

The Planning Commission hereby adopts the MND and the MMRP attached hereto as Exhibit C and incorporated herein as part of this Resolution/Motion by this reference thereto. All required mitigation measures identified in the IS/MND and contained in the MMRP are included as conditions of approval.

APPEAL AND EFFECTIVE DATE OF MOTION: Any aggrieved person may appeal this Section 309 Downtown Project Authorization to the Board of Appeals within fifteen (15) days after the date of this Motion. The effective date of this Motion shall be the date of this Motion if not appealed OR the date of the decision of the Board of Appeals if appealed to the Board of Appeals. For further information, please contact the Board of Appeals in person at 1650 Mission Street, Room 304 or call (415) 575-6880.

I hereby certify that the Planning Commission **ADOPTED** the foregoing Motion on November 13, 2014.

Jonas P. Ionin
Commission Secretary

AYES: Commissioners Antonini, Fong, Hillis, Johnson, Moore, Richards, and Wu

NAYS: None

ABSENT: None

ADOPTED: November 13, 2014

EXHIBIT A

AUTHORIZATION

This authorization is for a Section 309 Determination of Compliance affirming an administrative approval to allow the construction of a one-story vertical addition, roof deck, and circulation penthouse to the existing two-story-over-basement building, replacement of The Embarcadero façade and restoration of the Steuart Street façade, and rehabilitation for office and assembly use (for Commonwealth Club of California) of the building located at 110 The Embarcadero/115 Steuart Street within the C-3-O District and the 84-X Height and Bulk District; in general conformance with plans, dated December 17, 2013, and stamped "EXHIBIT B" included in the docket for Case No. 2011.1388EX. This authorization and the conditions contained herein run with the property and not with a particular Project Sponsor, business, or operator.

RECORDATION OF CONDITIONS OF APPROVAL

Prior to the issuance of the building permit or commencement of use for the Project the Zoning Administrator shall approve and order the recordation of a Notice in the Official Records of the Recorder of the City and County of San Francisco for the subject property. This Notice shall state that the project is subject to the conditions of approval contained herein and reviewed and approved by the Planning Commission on November 13, 2014 under Motion No. 19277.

PRINTING OF CONDITIONS OF APPROVAL ON PLANS

The conditions of approval under the 'Exhibit A' of this Planning Commission Motion No. 19277 shall be reproduced on the Index Sheet of construction plans submitted with the Site or Building permit application for the Project. The Index Sheet of the construction plans shall reference to the Determination of Compliance and any subsequent amendments or modifications.

SEVERABILITY

The Project shall comply with all applicable City codes and requirements. If any clause, sentence, section or any part of these conditions of approval is for any reason held to be invalid, such invalidity shall not affect or impair other remaining clauses, sentences, or sections of these conditions. This decision conveys no right to construct, or to receive a building permit. "Project Sponsor" shall include any subsequent responsible party.

CHANGES AND MODIFICATIONS

Changes to the approved plans may be approved administratively by the Zoning Administrator. Significant changes and modifications of conditions shall require Planning Commission approval of a new Determination of Compliance authorization.

Conditions of Approval, Compliance, Monitoring, and Reporting

PERFORMANCE

1. **Validity.** The authorization and right vested by virtue of this action is valid for three (3) years from the effective date of the Motion. The Department of Building Inspection shall have issued a Building Permit or Site Permit to construct the project and/or commence the approved use within this three-year period.
For information about compliance, contact Code Enforcement, Planning Department at 415-575-6863, www.sf-planning.org
2. **Expiration and Renewal.** Should a Building or Site Permit be sought after the three (3) year period has lapsed, the project sponsor must seek a renewal of this Authorization by filing an application for an amendment to the original Authorization or a new application for Authorization. Should the project sponsor decline to so file, and decline to withdraw the permit application, the Commission shall conduct a public hearing in order to consider the revocation of the Authorization. Should the Commission not revoke the Authorization following the closure of the public hearing, the Commission shall determine the extension of time for the continued validity of the Authorization.
For information about compliance, contact Code Enforcement, Planning Department at 415-575-6863, www.sf-planning.org
3. **Diligent pursuit.** Once a site or Building Permit has been issued, construction must commence within the timeframe required by the Department of Building Inspection and be continued diligently to completion. Failure to do so shall be grounds for the Commission to consider revoking the approval if more than three (3) years have passed since this Authorization was approved.
For information about compliance, contact Code Enforcement, Planning Department at 415-575-6863, www.sf-planning.org
4. **Extension.** All time limits in the preceding three paragraphs may be extended at the discretion of the Zoning Administrator where implementation of the project is delayed by a public agency, an appeal or a legal challenge and only by the length of time for which such public agency, appeal or challenge has caused delay.
For information about compliance, contact Code Enforcement, Planning Department at 415-575-6863, www.sf-planning.org
5. **Conformity with Current Law.** No application for Building Permit, Site Permit, or other entitlement shall be approved unless it complies with all applicable provisions of City Codes in effect at the time of such approval.
For information about compliance, contact Code Enforcement, Planning Department at 415-575-6863, www.sf-planning.org

6. **Mitigation Measures.** Mitigation measures described in the MMRP attached as Exhibit C are necessary to avoid potential significant effects of the proposed project and have been agreed to by the project sponsor. Their implementation is a condition of project approval.

For information about compliance, contact Code Enforcement, Planning Department at 415-575-6863, www.sf-planning.org

DESIGN – COMPLIANCE AT PLAN STAGE

7. **Final Materials.** The Project Sponsor shall continue to work with Planning Department on the building design. Final materials, glazing, color, texture, landscaping, and detailing shall be subject to Department staff review and approval. The architectural addenda shall be reviewed and approved by the Planning Department prior to issuance.

For information about compliance, contact the Case Planner, Planning Department at 415-558-6378, www.sf-planning.org

8. **Garbage, composting and recycling storage.** Space for the collection and storage of garbage, composting, and recycling shall be provided within enclosed areas on the property and clearly labeled and illustrated on the building permit plans. Space for the collection and storage of recyclable and compostable materials that meets the size, location, accessibility and other standards specified by the San Francisco Recycling Program shall be provided at the ground level of the buildings.

For information about compliance, contact the Case Planner, Planning Department at 415-558-6378, www.sf-planning.org

9. **Rooftop Mechanical Equipment.** Pursuant to Planning Code 141, the Project Sponsor shall submit a roof plan to the Planning Department prior to Planning approval of the building permit application. Rooftop mechanical equipment, if any is proposed as part of the Project, is required to be screened so as not to be visible from any point at or below the roof level of the subject building.

For information about compliance, contact the Case Planner, Planning Department at 415-558-6378, www.sf-planning.org

10. **Street Trees.** Pursuant to Planning Code Section 138.1 (formerly 143), the Project Sponsor shall submit a site plan to the Planning Department prior to Planning approval of the building permit application indicating that street trees, at a ratio of one street tree of an approved species for every 20 feet of street frontage along public or private streets bounding the Project, with any remaining fraction of 10 feet or more of frontage requiring an extra tree, shall be provided. The street trees shall be evenly spaced along the street frontage except where proposed driveways or other street obstructions do not permit. The exact location, size and species of tree shall be as approved by the Department of Public Works (DPW). In any case in which DPW cannot grant approval for installation of a tree in the public right-of-way, on the basis of inadequate sidewalk width, interference with utilities or other reasons regarding the public welfare, and where installation of such tree on the lot itself is also impractical, the requirements of this Section 428 may be modified or waived by the Zoning Administrator to the extent necessary.

For information about compliance, contact the Case Planner, Planning Department at 415-558-6378, www.sf-planning.org

11. **Transformer Vault.** The location of individual project PG&E Transformer Vault installations has significant effects to San Francisco streetscapes when improperly located. However, they may not have any impact if they are installed in preferred locations. Therefore, the Planning Department recommends the following preference schedule in locating new transformer vaults, in order of most to least desirable:
1. On-site, in a basement area accessed via a garage or other access point without use of separate doors on a ground floor façade facing a public right-of-way;
 2. On-site, in a driveway, underground;
 3. On-site, above ground, screened from view, other than a ground floor façade facing a public right-of-way;
 4. Public right-of-way, underground, under sidewalks with a minimum width of 12 feet, avoiding effects on streetscape elements, such as street trees; and based on Better Streets Plan guidelines;
 5. Public right-of-way, underground; and based on Better Streets Plan guidelines;
 6. Public right-of-way, above ground, screened from view; and based on Better Streets Plan guidelines;
 7. On-site, in a ground floor façade (the least desirable location).

Unless otherwise specified by the Planning Department, Department of Public Work's Bureau of Street Use and Mapping (DPW BSM) should use this preference schedule for all new transformer vault installation requests.

For information about compliance, contact Bureau of Street Use and Mapping, Department of Public Works at 415-554-5810, <http://sfdpw.org>

PARKING AND TRAFFIC

12. **Managing Traffic During Construction.** The Project Sponsor and construction contractor(s) shall coordinate with the Traffic Engineering and Transit Divisions of the San Francisco Municipal Transportation Agency (SFMTA), the Police Department, the Fire Department, the Planning Department, and other construction contractor(s) for any concurrent nearby Projects to manage traffic congestion and pedestrian circulation effects during construction of the Project.

For information about compliance, contact Code Enforcement, Planning Department at 415-575-6863, www.sf-planning.org

PROVISIONS

13. **Transit Impact Development Fee.** Pursuant to Planning Code Section 411 (formerly Chapter 38 of the Administrative Code), the Project Sponsor shall pay the Transit Impact Development Fee (TIDF) as required by and based on drawings submitted with the Building Permit Application. Prior to the issuance of a temporary certificate of occupancy, the Project Sponsor shall provide the Planning Director with certification that the fee has been paid.

For information about compliance, contact the Case Planner, Planning Department at 415-558-6378, www.sf-planning.org

MONITORING - AFTER ENTITLEMENT

14. **Enforcement.** Violation of any of the Planning Department conditions of approval contained in this Motion or of any other provisions of Planning Code applicable to this Project shall be subject to the enforcement procedures and administrative penalties set forth under Planning Code Section 176 or Section 176.1. The Planning Department may also refer the violation complaints to other city departments and agencies for appropriate enforcement action under their jurisdiction.
For information about compliance, contact Code Enforcement, Planning Department at 415-575-6863, www.sf-planning.org
15. **Revocation due to Violation of Conditions.** Should implementation of this Project result in complaints from interested property owners, residents, or commercial lessees which are not resolved by the Project Sponsor and found to be in violation of the Planning Code and/or the specific conditions of approval for the Project as set forth in Exhibit A of this Motion, the Zoning Administrator shall refer such complaints to the Commission, after which it may hold a public hearing on the matter to consider revocation of this authorization.
For information about compliance, contact Code Enforcement, Planning Department at 415-575-6863, www.sf-planning.org

OPERATION

16. **Garbage, Recycling, and Composting Receptacles.** Garbage, recycling, and compost containers shall be kept within the premises and hidden from public view, and placed outside only when being serviced by the disposal company. Trash shall be contained and disposed of pursuant to garbage and recycling receptacles guidelines set forth by the Department of Public Works.
For information about compliance, contact Bureau of Street Use and Mapping, Department of Public Works at 415-554-5810, <http://sfdpw.org>
17. **Sidewalk Maintenance.** The Project Sponsor shall maintain the main entrance to the building and all sidewalks abutting the subject property in a clean and sanitary condition in compliance with the Department of Public Works Streets and Sidewalk Maintenance Standards.
For information about compliance, contact Bureau of Street Use and Mapping, Department of Public Works, 415-695-2017, <http://sfdpw.org>
18. **Noise Control.** The premises shall be adequately soundproofed or insulated for noise and operated so that incidental noise shall not be audible beyond the premises or in other sections of the building and fixed-source equipment noise shall not exceed the decibel levels specified in the San Francisco Noise Control Ordinance.
For information about compliance with the fixed mechanical objects such as rooftop air conditioning, restaurant ventilation systems, and motors and compressors with acceptable noise levels, contact the Environmental Health Section, Department of Public Health at (415) 252-3800, www.sfdph.org
For information about compliance with the construction noise, contact the Department of Building Inspection, 415-558-6570, www.sfdbi.org
For information about compliance with the amplified sound including music and television contact the Police Department at 415-553-0123, www.sf-police.org

19. **Community Liaison.** Prior to issuance of a building permit to construct the project and implement the approved use, the Project Sponsor shall appoint a community liaison officer to deal with the issues of concern to owners and occupants of nearby properties. The Project Sponsor shall provide the Zoning Administrator with written notice of the name, business address, and telephone number of the community liaison. Should the contact information change, the Zoning Administrator shall be made aware of such change. The community liaison shall report to the Zoning Administrator what issues, if any, are of concern to the community and what issues have not been resolved by the Project Sponsor.

For information about compliance, contact Code Enforcement, Planning Department at 415-575-6863, www.sf-planning.org

EXHIBIT C

MITIGATION MONITORING AND REPORTING PROGRAM
(Includes Text for Mitigation and Improvement Measures Agreed to by the Project Sponsor)

MITIGATION MONITORING AND REPORTING PROGRAM (Includes Text for Mitigation and Improvement Measures Agreed to by the Project Sponsor)				
	Responsibility for Implementation	Schedule	Monitoring/Report Responsibility	Status/Date Completed
MITIGATION MEASURES				
Cultural and Paleontological Resources				
<p>M-CP-2: Archeological Monitoring Program. Based on the reasonable potential that archeological resources may be present within the project site, the following measures shall be undertaken to avoid any potentially significant adverse effect from the proposed project on buried or submerged historical resources. The project sponsor shall retain the services of an archaeological consultant from the rotational Department Qualified Archaeological Consultants List (QACL) maintained by the Planning Department archaeologist. The project sponsor shall contact the Department archeologist to obtain the names and contact information for the next three archeological consultants on the QACL. The archeological consultant shall undertake an archeological monitoring program. All plans and reports prepared by the consultant as specified herein shall be submitted first and directly to the ERO for review and comment, and shall be considered draft reports subject to revision until final approval by the ERO. Archeological monitoring and/or data recovery programs required by this measure could suspend construction of the project for up to a maximum of four weeks. At the direction of the ERO, the suspension of <i>construction</i> can be extended beyond four weeks only if such a suspension is the only feasible means to reduce to a less than significant level potential effects on a significant archeological resource as defined in CEQA Guidelines Sect. 15064.5 (a)(c).</p> <p>Consultation with Descendant Communities: On discovery of an archeological site¹ associated with descendant Native Americans or the Overseas Chinese an appropriate representative² of the descendant group and the ERO shall be contacted. The representative of the descendant group shall be given the opportunity to monitor archeological field investigations of the site and to consult with ERO regarding appropriate archeological treatment of the site, of recovered data from the site, and, if applicable, any interpretative treatment of the associated archeological site. A copy of the Final Archaeological Resources Report shall be provided to the representative of the descendant group.</p> <p>Archeological monitoring program (AMP). The archeological monitoring program shall minimally include the following provisions:</p> <ul style="list-style-type: none"> The archeological consultant, project sponsor, and ERO shall meet and consult on the scope of the AMP reasonably prior to any project-related soils disturbing activities commencing. The ERO in consultation with the project archeologist shall 	Project sponsor	AMP development to occur prior to any project-related soils disturbing activities. Monitoring to occur during soils disturbing activities as specified in AMP.	Planning Department to review and approve AMP	As specified in AMP

¹ By the term "archeological site" is intended here to minimally include any archeological deposit, feature, burial, or evidence of burial.
² An "appropriate representative" of the descendant group is here defined to mean, in the case of Native Americans, any individual listed in the current Native American Contact List for the City and County of San Francisco maintained by the California Native American Heritage Commission and in the case of the Overseas Chinese, the Chinese Historical Society of America.

MITIGATION MONITORING AND REPORTING PROGRAM (Includes Text for Mitigation and Improvement Measures Agreed to by the Project Sponsor)				
	Responsibility for Implementation	Schedule	Monitoring/Report Responsibility	Status/Date Completed
<p>determine what project activities shall be archeologically monitored. In most cases, any soils disturbing activities, such as demolition, foundation removal, excavation, grading, utilities installation, foundation work, driving of piles (foundation, shoring, etc.), site remediation, etc., shall require archeological monitoring because of the potential risk these activities pose to archaeological resources and to their depositional context;</p> <ul style="list-style-type: none"> ▪ The archeological consultant shall advise all project contractors to be on the alert for evidence of the presence of the expected resource(s), of how to identify the evidence of the expected resource(s), and of the appropriate protocol in the event of apparent discovery of an archeological resource; ▪ The archeological monitor(s) shall be present on the project site according to a schedule agreed upon by the archeological consultant and the ERO until the ERO has, in consultation with the archeological consultant, determined that project construction activities could have no effects on significant archeological deposits; ▪ The archeological monitor shall record and be authorized to collect soil samples and artifactual/ecofactual material as warranted for analysis; ▪ If an intact archeological deposit is encountered, all soils disturbing activities in the vicinity of the deposit shall cease. The archeological monitor shall be empowered to temporarily redirect demolition/excavation/pile driving/construction crews and heavy equipment until the deposit is evaluated. If in the case of pile driving activity (foundation, shoring, etc.), the archeological monitor has cause to believe that the pile driving activity may affect an archeological resource, the pile driving activity shall be terminated until an appropriate evaluation of the resource has been made in consultation with the ERO. The archeological consultant shall immediately notify the ERO of the encountered archeological deposit. The archeological consultant shall, after making a reasonable effort to assess the identity, integrity, and significance of the encountered archeological deposit, present the findings of this assessment to the ERO. <p>If the ERO in consultation with the archeological consultant determines that a significant archeological resource is present and that the resource could be adversely affected by the proposed project, at the discretion of the project sponsor either:</p> <p>A) The proposed project shall be re-designed so as to avoid any adverse effect on the significant archeological resource; or</p> <p>B) An archeological data recovery program shall be implemented, unless the ERO determines that the archeological resource is of greater interpretive than research significance and that interpretive use of the resource is feasible.</p> <p>If an archeological data recovery program is required by the ERO, the archeological data recovery program shall be conducted in accord with an archeological data recovery plan (ADRP). The project archeological consultant, project sponsor, and ERO shall meet and consult on the scope of the ADRP. The archeological consultant shall prepare a draft</p>				

MITIGATION MONITORING AND REPORTING PROGRAM (Includes Text for Mitigation and Improvement Measures Agreed to by the Project Sponsor)				
	Responsibility for Implementation	Schedule	Monitoring/Report Responsibility	Status/Date Completed
<p>ADRP that shall be submitted to the ERO for review and approval. The ADRP shall identify how the proposed data recovery program will preserve the significant information the archeological resource is expected to contain. That is, the ADRP will identify what scientific/historical research questions are applicable to the expected resource, what data classes the resource is expected to possess, and how the expected data classes would address the applicable research questions. Data recovery, in general, should be limited to the portions of the historical property that could be adversely affected by the proposed project. Destructive data recovery methods shall not be applied to portions of the archeological resources if nondestructive methods are practical.</p> <p>The scope of the ADRP shall include the following elements:</p> <ul style="list-style-type: none"> ▪ <i>Field Methods and Procedures.</i> Descriptions of proposed field strategies, procedures, and operations. ▪ <i>Cataloguing and Laboratory Analysis.</i> Description of selected cataloguing system and artifact analysis procedures. ▪ <i>Discard and Deaccession Policy.</i> Description of and rationale for field and post-field discard and deaccession policies. ▪ <i>Interpretive Program.</i> Consideration of an on-site/off-site public interpretive program during the course of the archeological data recovery program. ▪ <i>Security Measures.</i> Recommended security measures to protect the archeological resource from vandalism, looting, and non-intentionally damaging activities. ▪ <i>Final Report.</i> Description of proposed report format and distribution of results. ▪ <i>Curation.</i> Description of the procedures and recommendations for the curation of any recovered data having potential research value, identification of appropriate curation facilities, and a summary of the accession policies of the curation facilities. <p><i>Human Remains, Associated or Unassociated Funerary Objects.</i> The treatment of human remains and of associated or unassociated funerary objects discovered during any soils disturbing activity shall comply with applicable State and Federal Laws, including immediate notification of the Coroner of the City and County of San Francisco and in the event of the Coroner's determination that the human remains are Native American remains, notification of the California State Native American Heritage Commission (NAHC) who shall appoint a Most Likely Descendant (MLD) (Pub. Res. Code Sec. 5097.98). The archeological consultant, project sponsor, ERO, and MLD shall make all reasonable efforts to develop an agreement for the treatment of, with appropriate dignity, human remains and associated or unassociated funerary objects (CEQA Guidelines, Sec. 15064.5(d)). The agreement should take into consideration the appropriate excavation, removal, recordation, analysis, curation, possession, and final disposition of the human remains and associated or unassociated funerary objects.</p> <p><i>Final Archeological Resources Report.</i> The archeological consultant shall submit a Draft</p>				

MITIGATION MONITORING AND REPORTING PROGRAM (Includes Text for Mitigation and Improvement Measures Agreed to by the Project Sponsor)				
	Responsibility for Implementation	Schedule	Monitoring/Report Responsibility	Status/Date Completed
<p>Final Archeological Resources Report (FARR) to the ERO that evaluates the historical significance of any discovered archeological resource and describes the archeological and historical research methods employed in the archeological testing/monitoring/data recovery program(s) undertaken. Information that may put at risk any archeological resource shall be provided in a separate removable insert within the draft final report.</p> <p>Copies of the Draft FARR shall be sent to the ERO for review and approval. Once approved by the ERO copies of the FARR shall be distributed as follows: California Archaeological Site Survey Northwest Information Center (NWIC) shall receive one (1) copy and the ERO shall receive a copy of the transmittal of the FARR to the NWIC. The Environmental Planning division of the Planning Department shall receive one bound, one unbound and one unlocked, searchable PDF copy on CD of the FARR along with copies of any formal site recordation forms (CA DPR 523 series) and/or documentation for nomination to the National Register of Historic Places/California Register of Historical Resources. In instances of high public interest or interpretive value, the ERO may require a different final report content, format, and distribution than that presented above.</p>				
<p>Air Quality</p> <p>A. Construction Emissions Minimization Plan. Prior to issuance of a construction permit, the project sponsor shall submit a Construction Emissions Minimization Plan (Plan) to the Environmental Review Officer (ERO) for review and approval by an Environmental Planning Air Quality Specialist. The Plan shall detail project compliance with the following requirements:</p> <p>1. All off-road equipment greater than 25 hp and operating for more than 20 total hours over the entire duration of construction activities shall meet the following requirements:</p> <p>a) Where access to alternative sources of power are available, portable diesel engines shall be prohibited;</p> <p>b) All off-road equipment shall have:</p> <p style="margin-left: 20px;">i. Engines that meet or exceed either U.S. Environmental Protection Agency (USEPA) or California Air Resources Board (ARB) Tier 2 off-road emission standards, and</p> <p style="margin-left: 20px;">ii. Engines that are retrofitted with an ARB Level 3 Verified Diesel Emissions Control Strategy (VDECS).</p> <p>c) Exceptions:</p> <p style="margin-left: 20px;">i. Exceptions to A(1)(a) may be granted if the project sponsor has submitted information providing evidence to the satisfaction of the ERO that an alternative source of power is limited or infeasible at the project site and that the requirements of this exception provision apply. Under this circumstance, the sponsor shall submit documentation of</p>				
	Project sponsor	Plan development to occur prior to issuance of building permit. Monitoring to occur during construction.	Planning Department to review and approve plan. Project sponsor to submit quarterly reports to Planning Department during construction, and final report six (6) months after construction.	As specified in plan

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EXHIBIT C**

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MITIGATION MONITORING AND REPORTING PROGRAM (Includes Text for Mitigation and Improvement Measures Agreed to by the Project Sponsor)																
	Responsibility for Implementation	Schedule	Monitoring/Report Responsibility	Status/Date Completed												
<p>compliance with A(1)(b) for onsite power generation. ii. Exceptions to A(1)(b)(ii) may be granted if the project sponsor has submitted information providing evidence to the satisfaction of the ERO that a particular piece of off-road equipment with an ARB Level 3 VDECS is: (1) technically not feasible, (2) would not produce desired emissions reductions due to expected operating modes, (3) installing the control device would create a safety hazard or impaired visibility for the operator, or (4) there is a compelling emergency need to use off-road equipment that are not retrofitted with an ARB Level 3 VDECS and the sponsor has submitted documentation to the ERO that the requirements of this exception provision apply. If granted an exception to A(1)(b)(ii), the project sponsor must comply with the requirements of A(1)(c)(iii). iii. If an exception is granted pursuant to A(1)(c)(ii), the project sponsor shall provide the next cleanest piece of off-road equipment as provided by the step down schedules in Table 3.</p> <p>Table 3 – Off-Road Equipment Compliance Step-down Schedule</p> <table border="1"> <thead> <tr> <th>Compliance Alternative</th> <th>Engine Emission Standard</th> <th>Emissions Control</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Tier 2</td> <td>ARB Level 2 VDECS</td> </tr> <tr> <td>2</td> <td>Tier 2</td> <td>ARB Level 1 VDECS</td> </tr> <tr> <td>3</td> <td>Tier 2</td> <td>Alternative Fuel*</td> </tr> </tbody> </table> <p>How to use the table: If the requirements of (A)(1)(b) cannot be met, then the project sponsor would need to meet Compliance Alternative 1. Should the project sponsor not be able to supply off-road equipment meeting Compliance Alternative 1, then Compliance Alternative 2 would need to be met. Should the project sponsor not be able to supply off-road equipment meeting Compliance Alternative 2, then Compliance Alternative 3 would need to be met.</p> <p>* Alternative fuels are not a VDECS.</p> <p>2. The project sponsor shall require the idling time for off-road and on-road equipment be limited to no more than two minutes, except as provided in exceptions to the applicable state regulations regarding idling for off-road and on-road equipment. Legible and visible signs shall be posted in multiple languages (English, Spanish, Chinese) in designated queuing areas and at the construction site to remind operators of the two minute idling limit.</p> <p>3. The project sponsor shall require that construction operators properly maintain and tune equipment in accordance with manufacturer specifications.</p> <p>4. The Plan shall include estimates of the construction timeline by phase with a description of each piece of off-road equipment required for every construction</p>					Compliance Alternative	Engine Emission Standard	Emissions Control	1	Tier 2	ARB Level 2 VDECS	2	Tier 2	ARB Level 1 VDECS	3	Tier 2	Alternative Fuel*
Compliance Alternative	Engine Emission Standard	Emissions Control														
1	Tier 2	ARB Level 2 VDECS														
2	Tier 2	ARB Level 1 VDECS														
3	Tier 2	Alternative Fuel*														

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MITIGATION MONITORING AND REPORTING PROGRAM (Includes Text for Mitigation and Improvement Measures Agreed to by the Project Sponsor)				
	Responsibility for Implementation	Schedule	Monitoring/Report Responsibility	Status/Date Completed
<p>phase. Off-road equipment descriptions and information may include, but is not limited to: equipment type, equipment manufacturer, equipment identification number, engine model year, engine certification (Tier rating), horsepower, engine serial number, and expected fuel usage and hours of operation. For VDECS installed: technology type, serial number, make, model, manufacturer, ARB verification number level, and installation date and hour meter reading on installation date. For off-road equipment using alternative fuels, reporting shall indicate the type of alternative fuel being used.</p> <p>5. The Plan shall be kept on-site and available for review by any persons requesting it and a legible sign shall be posted at the perimeter of the construction site indicating to the public the basic requirements of the Plan and a way to request a copy of the Plan. The project sponsor shall provide copies of Plan to members of the public as requested.</p> <p>B. Reporting. Quarterly reports shall be submitted to the ERO indicating the construction phase and off-road equipment information used during each phase including the information required in A(4). In addition, for off-road equipment using alternative fuels, reporting shall include the actual amount of alternative fuel used. Within six months of the completion of construction activities, the project sponsor shall submit to the ERO a final report summarizing construction activities. The final report shall indicate the start and end dates and duration of each construction phase. For each phase, the report shall include detailed information required in A(4). In addition, for off-road equipment using alternative fuels, reporting shall include the actual amount of alternative fuel used.</p> <p>C. Certification Statement and On-site Requirements. Prior to the commencement of construction activities, the project sponsor must certify (1) compliance with the Plan, and (2) all applicable requirements of the Plan have been incorporated into contract specifications.</p>				
IMPROVEMENT MEASURES				
Transportation				
<p>IM-TR-1a – Transportation Demand Management Program. The Proposed Project shall provide at least ten (10) secured bicycle storage locations in the basement for the employees to promote other modes of transportation. In addition, the project sponsor shall implement a Transportation Demand Management (TDM) Program for both employees and visitors that seeks to annually reduce the number of single occupancy vehicle (SOV) trips to and from the project site and encourage persons arriving/departing via alternative modes of transportation (e.g., walking, bicycling, transit). The project sponsor shall designate one or more TDM program managers/contacts, and provide training for these positions. Commonwealth Club shall document and make available upon request, biannually (every two years) monitoring reports, starting one year after certificate of occupancy for the building (baseline year), for</p>	Project sponsor	Prior certificate of occupancy issuance	Project sponsor to submit biannual reports to Planning Department starting one year after certificate of occupancy issuance	Continuous

MITIGATION MONITORING AND REPORTING PROGRAM (Includes Text for Mitigation and Improvement Measures Agreed to by the Project Sponsor)				
	Responsibility for Implementation	Schedule	Monitoring/Report Responsibility	Status/Date Completed
<p>review by the City, including the Planning Department. The biannual monitoring reports should include travel demand surveys (i.e., travel demand analysis information requested in the SF Guidelines³) of employees and visitors arriving and leaving the building for up to seven days of the reporting period. Generally, the TDM program shall be considered effective if in two consecutive reporting periods that there is a 10 percent reduction⁴ in SOV trips to and from the project site from the baseline year. The project sponsor shall consider and include some or all of the following TDM measures:</p> <ul style="list-style-type: none"> • Provide ongoing local and regional transportation information (e.g., transit maps and schedules, maps of bicycle routes, internet links) for new and existing employees and patrons, including providing a transportation insert for the invitation packet that would provide information on transit service (Muni and BART lines, schedules and fares), car- and bike-share information, information on where transit passes could be purchased, and information on the 511 Regional Rideshare Program. • Continue to participate in the Muni FastPass (loaded onto a Clipper card) program as part of the Commonwealth Club employee benefits package. • Provide information on transportation options, including updates and a "ride board" through which employees and patrons can offer/request rides, on the website and/or lobby bulletin board. • Encourage the use of bicycles by increasing the number of on-site and potentially on-street bicycle racks making them convenient and easy to use. Provide clear points of access to bicycle parking and storage through elevators and/or on the ground floor, and ensure signage indicates the location of these facilities (if public). • Consider providing discounted bike share membership passes for employees as part of the Commonwealth Club employee benefits package. • Promote the nearby bike share stations as part of travel information, providing links to additional information on use and membership. • Similarly, provide information regarding local car share programs. 				
<p>IM-TR-1b: Construction Deliveries. To further minimize the construction-related disruption of the general traffic flow on adjacent streets during the AM and PM peak periods, truck movements and deliveries shall be restricted to off-peak hours (generally outside of 7 AM to 9 AM and 4 PM to 6 PM on weekdays, but restrictions may include other times during Giants game days), or other times, as determined by SFMTA and its Transportation Advisory Staff Committee (TASC).</p>	Project sponsor	During construction	SFMTA to monitor compliance with TASC restrictions	Continues until completion of construction
<p>IM-TR-1c: Construction Management Plan – Additional Actions. The project sponsor</p>	Project Sponsor	Plan development to occur	Planning Department to	Continues until

³ City and County of San Francisco, Transportation Impact Analysis Guidelines for Environmental Review, October 2002, Chapter 3, Section 3.

⁴ The 10 percent reduction aligns with the reduction required between 2010 and 2018 for the San Francisco Municipal Transportation Agency to meet their 50 percent private automobile mode share goal outlined in the Strategic Plan, Fiscal year 2013 – Fiscal Year 2018.

MITIGATION MONITORING AND REPORTING PROGRAM (Includes Text for Mitigation and Improvement Measures Agreed to by the Project Sponsor)				
	Responsibility for Implementation	Schedule	Monitoring/Report Responsibility	Status/Date Completed
<p>shall be required to develop and implement a Construction Management Plan (CMP), addressing transportation-related circulation, access, staging, and potential lane and sidewalk closures. In addition to these requirements, the project sponsor shall consider implementing the following measures as part of the CMP:</p> <ul style="list-style-type: none"> • Construction and Transit Access for Construction Workers – to minimize parking demand and vehicle trips associated with construction workers, include methods to encourage carpooling and transit use to the project site by construction workers. • Project Construction Coordination and Updates for Adjacent Businesses, the Public and Residents: The project sponsor shall be required to consult with surrounding community members, including business and property owners near the project site to assist coordination of construction traffic management strategies as they relate to the needs of those adjacent to the project site. The project sponsor shall develop a public information plan to provide adjacent residents and businesses with regularly-updated information and a construction-management contact person who shall provide information on project construction activities and schedule, peak construction vehicle activities (e.g. concrete pours), travel detours or other lane closures. 		<p>prior to issuance of building permit. Monitoring to occur during construction.</p>	<p>review and approve CMP</p>	<p>completion of construction</p>



SAN FRANCISCO PLANNING DEPARTMENT

Planning Commission Motion [XXXX]

HEARING DATE: September 18, 2014

Hearing Date: September 18, 2014
Case No.: 2011.1388E
Project Address: 110 The Embarcadero/115 Steuart Street
Zoning: C-3-O (Downtown Office) Use District
84-X Height and Bulk District
Block/Lot: 3715/002
Project Sponsor: Piper Kujac, Owner's Representative and Building Project Manager, The Commonwealth Club of California
595 Market Street, 2nd Floor
San Francisco, CA 94105
Staff Contact: Kansai Uchida – (415) 575-9048
kansai.uchida@sfgov.org

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

Recapitol:
415.558.6378

Fax:
415.558.6409

Planning
Information:
415.558.6377

ADOPTING FINDINGS RELATED TO THE APPEAL OF THE PRELIMINARY MITIGATED NEGATIVE DECLARATION, FILE NUMBER 2011.1388E FOR THE PROPOSED DEVELOPMENT ("PROJECT") AT 110 THE EMBARCADERO/115 STEUART STREET.

MOVED, that the San Francisco Planning Commission (hereinafter "Commission") hereby AFFIRMS the decision to issue a Mitigated Negative Declaration, based on the following findings:

1. On August 1, 2013, pursuant to the provisions of the California Environmental Quality Act ("CEQA"), the State CEQA Guidelines, and Chapter 31 of the San Francisco Administrative Code, the Planning Department ("Department") received an Environmental Evaluation Application form for the Project, in order that it might conduct an initial evaluation to determine whether the Project might have a significant impact on the environment.
2. On June 25, 2014, the Department determined that the Project, as proposed, could not have a significant effect on the environment.
3. On June 25, 2014, a notice of determination that a Mitigated Negative Declaration would be issued for the Project was duly published in a newspaper of general circulation in the City, and the Mitigated Negative Declaration posted in the Department offices, and distributed all in accordance with law.
4. On July 15, 2014, an appeal of the decision to issue a Mitigated Negative Declaration was timely filed by David Osgood of Rincon Point Neighbors Association.
5. On July 15, 2014, phone comments and a comment letter concerning the decision to issue a Mitigated Negative Declaration were submitted by Bradley Wiedmaier. In response to clarifications requested

by Planning Department staff, Mr. Osgood indicated by e-mail on July 16, 2014 that the letter submitted by Mr. Wiedmaier is part of his appeal.

6. On July 17, 2014, a comment letter concerning the decision to issue a Mitigated Negative Declaration was submitted by Mike Buhler of SF Heritage.
7. A staff memorandum, dated September 11, 2014, addresses and responds to all points raised by the appellant in the appeal letter and by the commenters in the submitted comments. That memorandum is attached as Exhibit A and staff's findings as to those points are incorporated by reference herein as the Commission's own findings. Copies of that memorandum have been delivered to the City Planning Commission, and a copy of that memorandum is on file and available for public review at the San Francisco Planning Department, 1650 Mission Street, Suite 400.
8. On September 18, 2014, the Commission held a duly noticed and advertised public hearing on the appeal of the Preliminary Mitigated Negative Declaration, at which testimony on the merits of the appeal, both in favor of and in opposition to, was received.
9. All points raised in the appeal of the Preliminary Mitigated Negative Declaration at the September 18, 2014 City Planning Commission hearing have been responded to either in the Memorandum or orally at the public hearing.
10. After consideration of the points raised by appellant, both in writing and at the September 18, 2014 hearing, the San Francisco Planning Department reaffirms its conclusion that the proposed project could not have a significant effect upon the environment.
11. In reviewing the Preliminary Mitigated Negative Declaration issued for the Project, the Planning Commission has had available for its review and consideration all information pertaining to the Project in the Planning Department's case file.
12. The Planning Commission finds that Planning Department's determination on the Mitigated Negative Declaration reflects the Department's independent judgment and analysis.

The City Planning Commission HEREBY DOES FIND that the proposed Project, could not have a significant effect on the environment, as shown in the analysis of the Mitigated Negative Declaration, and HEREBY DOES AFFIRM the decision to issue a Mitigated Negative Declaration, as prepared by the San Francisco Planning Department.

I hereby certify that the foregoing Motion was ADOPTED by the City Planning Commission on September 18, 2014.

Jonas Ionin
Commission Secretary



Planning Department

September 18, 2014

SAN FRANCISCO PLANNING COMMISSION

Meeting Minutes

Commission Chambers, Room 400
City Hall, 1 Dr. Carlton B. Goodlett Place
San Francisco, CA 94102-4689

Thursday, September 18, 2014

12:00 p.m.

Regular Meeting

COMMISSIONERS PRESENT: Wu, Fong, Antonini, Hillis, Johnson, Moore, Richards

THE MEETING WAS CALLED TO ORDER BY PRESIDENT WU AT 12: 12 P.M.

STAFF IN ATTENDANCE: John Rahaim – Planning Director, Omar Masry, Aaron Starr, Elizabeth Watty, Jeff Speirs, Diego Sanchez, Kanishka Burns, Kansai Uchida, Wade Wietgreffe, Brittany Bendix, Sara Vellve, Michael Smith, Eillesh Tuffy, Glenn Cabrerros, and Jonas P. Ionin – Commission Secretary

SPEAKER KEY:

- + indicates a speaker in support of an item;
- indicates a speaker in opposition to an item; and
- = indicates a neutral speaker or a speaker who did not indicate support or opposition.

A. CONSIDERATION OF ITEMS PROPOSED FOR CONTINUANCE

The Commission will consider a request for continuance to a later date. The Commission may choose to continue the item to the date proposed below, to continue the item to another date, or to hear the item on this calendar.

1. 2014.0377C (J. SPEIRS:
(415) 575-9106)

2861-2865 SAN BRUNO AVENUE - east side between Wayland Street and Woolsey Street, Lot 022 in Assessor's Block 5457 - **Request for Conditional Use Authorization** pursuant to Planning Code Sections 711.36 and 317, to allow the residential conversion of two dwelling units at the second floor to two office spaces (Business or Personal Service) within a NC-2 (Neighborhood Commercial, Small Scale) Zoning District and 40-X Height and Bulk District. The project includes a third and fourth floor vertical addition to add two new dwelling units. This action constitutes the Approval Action for the project for the purposes of CEQA, pursuant to Section 31.04(h) of the San Francisco Administrative Code.

Preliminary Recommendation: Pending

(Proposed for Continuance to October 16, 2014)

SPEAKERS: None

ACTION: Continued to October 16, 2014

AYES: Wu, Fong, Antonini, Hillis, Johnson, Moore, Richards

- 2a. 2012.0678E!KUVX (E. WATTY: (415)
558-6620)

19-25 MASON STREET (AKA 2-16 TURK STREET) - northwest corner of Mason and Turk Streets; Lots 002, 005, 006 in Assessor's Block 0340 - **Request for Determination of Compliance** pursuant to Planning Code Section 309, with exceptions to the requirements for "Rear Yard" (Section 134), "Reduction of Ground-Level Wind Currents in C-3 Districts" (Section 148), and "Residential Accessory Parking" (Section 151.1(f)). The proposed project would remove an existing surface parking lot and construct a new, 12-story, 112,600 gsf, mixed-use building, with 109 dwelling units, 52 off-street parking spaces, and approximately 2,400 sf of ground-floor retail space. The project site is located within the C-3-G (Downtown General) Zoning District and 120-X Height and Bulk District.

(Continued from Regular Meeting of August 14, 2014)

(Proposed for Indefinite Continuance)

SPEAKERS: None

ACTION: Continued Indefinitely

AYES: Wu, Fong, Antonini, Hillis, Johnson, Moore, Richards

- 2b. 2012.0678E!KUVX (E. WATTY:
(415) 558-6620)

19-25 MASON STREET (AKA 2-16 TURK STREET) - northwest corner of Mason and Turk

Streets; Lots 002, 005, 006 in Assessor's Block 0340 - **Request for Variances**, pursuant to Planning Code Section 140, for dwelling unit exposure for 19 of the 109 units. The proposed project would remove an existing surface parking lot and construct a new, 12-story, 112,600 gsf, mixed-use building, with 109 dwelling units, 52 off-street parking spaces, and approximately 2,400 sf of ground-floor retail space. The project site is located within the C-3-G (Downtown General) Zoning District and 120-X Height and Bulk District.

(Proposed for Indefinite Continuance)

SPEAKERS: None

ACTION: ZA Continued Indefinitely

3. 2013.1668T (A)
STARR: (415) 558-6362)

BONA FIDE EATING PLACE - Planning Commission **consideration of an Ordinance [BF 131064] amending the Planning Code** to expand the definition of "bona fide eating place" to include a definition based on food sales per occupant and modifying the definition of a Bar to include establishments with an ABC License Type 47 that are not Bona Fide Eating Places; and making environmental findings and findings of consistency with the General Plan and the eight priority policies of Planning Code Section 101.1.

Preliminary Recommendation: Adopt a Recommendation for Approval with Modifications

(Continued from Regular Meeting of June 19, 2014)

(Proposed for Indefinite Continuance)

SPEAKERS: None

ACTION: Continued Indefinitely

AYES: Wu, Fong, Antonini, Hillis, Johnson, Moore, Richards

4. 2013.1620D (K)
BURNS: (415) 575-9112)

812 – 814 GREEN STREET - north side of Green Street, between Mason and Taylor Streets; Lot 010 in Assessor's Block 0119 - **Mandatory Discretionary Review**, pursuant to Planning Code Section 317(e), of Building Permit Application No. 2013.11.06.1249, proposing to make interior modifications to merge two dwelling units into one unit, resulting in the elimination of one unit in an existing three unit building within a RM-2 (Residential-Mixed, Moderate Density) Zoning District and 40-X Height and Bulk District. This action constitutes the Approval Action for the project for purposes of CEQA, pursuant to Section 31.04(h) of the San Francisco Administrative Code.

Preliminary Recommendation: Take Discretionary Review and Disapprove

(Continued from Regular Meeting of August 14, 2014)

(WITHDRAWN)

B. CONSENT CALENDAR

All matters listed hereunder constitute a Consent Calendar, are considered to be routine by the Planning Commission, and may be acted upon by a single roll call vote of the Commission. There will be no separate discussion of these items unless a member of the Commission, the public, or staff so requests, in which event the matter shall be removed from the Consent Calendar and considered as a separate item at this or a future hearing

5. 2012.0059C (O. MASRY;

(415) 575-9116)

431 BALBOA STREET - along the south side of Balboa Street, between 5th and 6th Avenues, Lot 047 in Assessor's Block 1639 - **Request for Conditional Use Authorization** under Planning Code Sections 711.83 and 303 to allow a macro wireless telecommunications services (WTS) facility operated by AT&T Mobility. The proposed macro WTS facility would feature nine (9) panel antennas screened by a combination of faux elements (vent pipes, rooftop mechanical screens, and a faux decorative parapet extension), on the roof of an existing three-story mixed-use building. Related electronic equipment would be located on the roof and in a ground floor room. The facility is proposed on a Location Preference 5 Site (Mixed-Use Building in a High-Density District) within a NC-2 (Neighborhood Commercial, Small-Scale) Zoning District, and 40-X Height and Bulk District. This action constitutes the Approval Action for the project for the purposes of CEQA, pursuant to Section 31.04(h) of the San Francisco Administrative Code.

Preliminary Recommendation: Approve with Conditions

SPEAKERS: + Ted Vriheas – Project presentation

- John Makibo – Views, light, RF emissions reports – not direct measurements
- Sho Lu Makibo – Aesthetics, notice
- (F) Speaker – Opposed, view
- Sue Chin Hung – Opposed, health
- Anne Chassey – No service need
- Daniel Wu – Radiation effects
- David Osgood – Opposition

ACTION: After being pulled off of Consent; Approved with Conditions

AYES: Wu, Fong, Antonini, Hillis, Johnson, Moore, Richards

MOTION: 19237

6. 2014.1240T (A)
STARR: (415) 558-6362

AMENDMENTS TO THE PLANNING CODE'S DEFINITION OF RESIDENTIAL UNIT AND RESIDENTIAL CONVERSION REQUIREMENTS [BOARD FILE NO. 140775] - Ordinance amending the Planning Code to amend the definition of Residential Unit and clarify the requirements for a Residential Conversion of a Residential Hotel Unit regulated under Administrative Code, Chapter 41; making environmental findings, and findings of consistency with the General Plan, and the eight priority policies of Planning Code, Section 101.1.

Preliminary Recommendation: Adopt a Recommendation for Approval

SPEAKERS: None

ACTION: After being pulled off of Consent; Adopted a Recommendation for Approval

AYES: Wu, Fong, Hillis, Johnson, Moore, Richards

NAYES: Antonini

RESOLUTION: 19238

C. COMMISSION MATTERS

7. Consideration of Adoption:
Draft Minutes for September 4, 2014

SPEAKERS: None
 ACTION: Adopted
 AYES: Wu, Fong, Antonini, Hillis, Johnson, Moore, Richards

Adoption of Commission Minutes – Charter Section 4.104 requires all commissioners to vote yes or no on all matters unless that commissioner is excused by a vote of the Commission. Commissioners may not be automatically excluded from a vote on the minutes because they did not attend the meeting.

8. Commission Comments/Questions

Inquiries/Announcements. Without discussion, at this time Commissioners may make announcements or inquiries of staff regarding various matters of interest to the Commissioner(s).

Future Meetings/Agendas. At this time, the Commission may discuss and take action to set the date of a Special Meeting and/or determine those items that could be placed on the agenda of the next meeting and other future meetings of the Planning Commission.

Commissioner Antonini:

A couple of things, last night I was able to go to see a preview of the renovated Masonic Auditorium. It had been before us and it was approved, as you know, and I think it was very well done and as we had mentioned during our discussions and as I voted, ultimately had been mostly to improve the facility, which I think in my opinion they did and made it a lot more functional. The other item I wanted to mention, I hope many of you have been able to watch Ken Burns' excellent series on PBS Channel 9, on the Roosevelt's, which is going to have its fifth night, tonight. I have seen three of the four nights and I think it's extremely well done, and from the histories I have read over the period, it seems to be very accurate and the nice thing about it is they don't hesitate to mention the warts, that is, the times when these individuals did things that might not have been the best or not made the best decisions. In any case, it is very important in the formation of the America we know today, the period of time characterized by both Presidents, Teddy Theodore Roosevelt and Franklin Roosevelt and of course Eleanor Roosevelt also is featured extensively in there. And the second episode ended with one of my favorite quotes by then President Theodore Roosevelt at the Sorbonne in 1905, the quote is known as, "It is not the critic that counts," but basically what Roosevelt was saying to his audience is, it's the one, the man in the arena, as he puts it, the one who is actually doing the deeds and risking his life and doing the best he can to do good is the one who really should get the credit not the person who just criticizes, and doesn't offer any constructive criticism or anything in replace of what is being proposed and the job that's being done by as he says, the man in the arena. I think it's one of my favorite quotes and it was a fitting ending to the second episode.

Commissioner Moore:

I'd like to ask the Director; if at all possible, the Commission received a letter from Perkins and Coie, who are now representing the Academy of Art, giving the Commission an update on the Academy. I believe that that update is a little thin relative to the detail many of us have spent on it over the years and I do think the public, just as well as, the Commission deserves a slightly more detailed update because we have asked more detailed questions. The second point is in yesterday's e-mail I received a wonderful copy of San Francisco Heritage with a draft on the Cultural History of the City. It takes, like snapshots of particular events and buildings and places. I understand the Historic Preservation Commission had a presentation by Heritage. I am wondering if we could have a similar presentation, because ultimately we at least should know -- while it does not influence what we do, it gives us a broader understanding of the larger issues which tie it all together. Would you consider that to be possible, Director Rahaim?

Director Rahaim:

Absolutely, we can work with the Chair to make that happen.

Commissioner Moore:

Thank you.

Commissioner Richards:

I guess parlaying off what Commissioner Moore said, I too was pleasantly surprised to receive these documents from San Francisco Heritage in the mail. I think, you know, we look at preservation through kind of a physical environment lens, the style of architecture, how old the building is, and maybe what happened there, but from a cultural point of view we have a little bit of catching up to do. I know the Gay and Lesbian Context Statement was adopted more than ten years ago. I know that there was an African American Context Statement that was adopted and I know it's in the works to have a Latino Context Statement that's coming, and I think, part of what makes San Francisco the wonderful place it is, is the social and cultural heritage that we have, and case in point, if you go online and look at the Heritage booklet on sustaining our living history, some of the most recent kind of things that have been publicized around changes in the social and cultural heritage started with the Pied Piper Bar and I think Commissioner Antonini, you could probably speak to that. That kind of started the ball rolling, on well wait a minute, if we had the Pied Piper go away and the Golden Dust Lounge go away and the Tonga Room go away, what is San Francisco going to look like? We had The Eagle go away which is a leather bar South of Market, went away for two years, it's come back, that's great, Esta Noche in the Mission is gone, the Roxy Theater's lease is up for renewal, I know Sam Wo is gone, they were there 100 years, Marcus Books is gone, and now the The End Up, which has been around, if you ever read *Tales of the City*, probably 40 years now, it's a fixture in the nightlife scene in the South of Market, their building is up for sale. So, I really think that getting our arms around what we can do strategically to prevent displacement for these kinds of businesses is good. And, actually on the back of one of the pamphlets, they talk about strategies that they would like to implement, that's why I would like them to also come to the Commission. The second thing I wanted to mention is, I asked Director Rahaim and staff if they could produce, I guess a pro forma in the pipeline report for the housing coming online. We keep referring to the income levels of housing, above moderate, is 120% of AMI, moderate is 80-120%, and then low income, lower than 80. I've only been here two meetings, we've had some discussion around what kinds of BMR units they are going to be, folks in the Mission want 55% or less or even lower than that. We hear that there is a big gap in the moderate income units to the point of, that we only produced about a quarter of what we need. And low income on 61 percent and we're way above moderate, at about 200 percent. I asked Director Rahaim if he could actually take a look at and maybe eyeball, for the 4,000 units coming, beyond 2014 in Hunters Point, Treasure Island and Park Merced, to give us an idea of what the world would look with those projects online. Would it move any of these numbers significantly or are we still, basically operating with the same deficit foundation in the low and moderate? I look forward to receiving that. My last point is, I struggle with the last two meetings with definition of family housing. I came across something on Twitter two days ago that what was retweeted by San Francisco Business Times and it was the First Republic Luxury Home Index. It kind of opened my eyes to, wow, this is what we are kind of dealing with. The luxury home defined by First Republic, and I'm sure that there's other barometers out there, is a home that's valued at \$3 million, it has three or more bedrooms, and it has 3,000 or more square feet. You can fit a family in that, of course, you can fit a family in a size less than that, but I think for my purposes and my lens moving forward, I'm going to call that definition a luxury family house, anything less than that would be family housing. So, the 26th and Clement we had called into a definition of what a family housing really would be. The 115 Telegraph Hill certainly is a luxury family house. That's kind of the lens I'm going to start looking at. If you want to refer to it, it's the First Republic Luxury Home Index, it's online. Thank you.

Commissioner Johnson:

Thank you very much. My first point here, I was thinking about this since our first meeting and would really like to request starting with a presentation from SFMTA. I would like to see how, starting with at least, starting how they are going to phase in the transportation improvements particularly in the area encompassed by the Eastern Neighborhoods Plan and eventually what will encompass the new Central SOMA Plan. We talk a lot about, there is a lot of maps of what the future state will look like, future, future, but I would like to understand what the phasing is going to look like and how that is going to come in over time, and how they are actually measuring when one phase is completed and when you need to move to the next phase in terms of density, in terms of intensification of various MUNI lines. I would like to have at least an informational presentation on that and potentially maybe in the future we can move to maybe a joint meeting or some other method of having a little bit more coordination between the Planning Department and SFMTA. My second one, is so minor, I almost hate myself for saying it. I noticed in our last few hearings when we had DR's, when it came time for comment that oftentimes individuals who technically are part of the project sponsor team, either they are co-owner of the property or they are related to the owner of the property or there is a very close relation would come up for comment and be confused as to why they couldn't speak because they should have been considered part of the project sponsor team. You are always going to have people who are unfamiliar with how the Planning Commission works, maybe they haven't come to a hearing before, so we are going to have to deal with that, but I think that one thing we could make a little bit easier is in our agendas we have standard language underneath the regular calendar that talks about the project sponsor team includes, colon, and then it lists off a few things. One of the first ones says the sponsor or their designee and I'd like to find a way to maybe add another clause that just clarifies who else would be considered part of the sponsor team, so if you have an ownership interest in the property or some sort of clarifying language I think that would be helpful. I wasn't going to say it the first couple of times, but then it happened a few more times and I want people to understand when they can make comment, what group

they should be a part of, who they should be communicating with, so they are not confused when they get here. Thank you.

Commissioner Wu:

I think that's something we can work on with the Commission Secretary.

Jonas Ionin, Commission Secretary:

If there is nothing further we can move on but, just quickly to respond to Commissioner Johnson. The Historic Preservation Commission just yesterday adopted new rules and regulations for their procedures, and as a part of that Commissioner Johns is actually working with staff on a handout that would go along with how to make a public presentation and what to expect. Maybe we can adopt something similar for the Planning Commission that could be a part of applications that go out to applicants.

D. DEPARTMENT MATTERS

9. Director's Announcements

Director Rahaim:

Thank you. Good Afternoon, Commissioners, just two things. With respect to the Academy of Art, we will be happy to prepare a more detailed memo on the status. Just so you do know, we are on track for the release of the Draft EIR in November, which has been the kind of date that we've been working toward for quite a few months. Secondly, I wanted to just let you know that we are working with the Office of Economic and Workforce Development and the developer of the Flower Mart. There has been a lot in the media about this; there has been a lot discussion in the community about this. There is no architectural design that is yet proposed but, but we believe it's possible given the size of the site to fully maintain a Flower Mart on that site. The developer is willing to work with us on this. Further, the Mayor has directed the Office of Economic and Workforce Development to work with us and the developer to ensure that the Flower Mart is actually maintained on site, with any new development that is there. We are very early on the process; they haven't even applied for their Preliminary Plan Assessment yet, but we will soon be working with them when they do make that application to ensure the Flower Mart does, in fact, stay on site. We anticipate that it's physically possible to do that. We will let you know as the applications come in, over the next twelve months or so on the status of that. That concludes my presentation. Happy to take any questions.

10. Review of Past Events at the Board of Supervisors, Board of Appeals and Historic Preservation Commission

LAND USE COMMITTEE:

Short-Term Rentals. Commissioners, you heard this item on August 7. At that time you recommended approval with 16 amendments be made to the legislation[1]. These requested changes were delivered to the Board. At the land use hearing, the Director emphasized the shared goal of created a legal avenue for this use and thanked the Supervisor for taking on this challenging issue. At the same time, the Director emphasized the need to focus on three key changes: 1) Ensure that the system is not abused by creating real limits on the number of days a unit can be rented. 2) Dedicated budget for enforcement staff. And 3) Limits for hosted units too. There was about 7 hours of public comment. A representative from one hosting platform, AirBNB, came to the hearing and addressed the Board.

As part of the Board discussions, there were Significant amendments were made to the V2 ordinance. Supervisor Chiu introduced 8 amendments which were incorporated into the ordinance. (person can only have 1 perm. residence, only 1 registrant per unit, suspend permission if there is an outstanding Code violation—until violation is cured, posting ads w/o registration is a violation, need a valid business registration, hosting platform shall maintain record of tax payment—not maintaining these records is a violation by the platform, hosting platform can respond to alleged violations at the administrative hearing). Supervisors Wiener (in consultation w/ Farrell) amended the ordinance to require that the Planning Department shall send mailed notice to the property owner when a resident applies for the registry. Supervisor Kim amended the ordinance to add the HOA (if any) related to the unit to the interested parties list who are eligible to sue. The Committee orally amended the Ordinance to limit the rentals to 265 every year and not just the year prior to getting on the registry.

Supervisor Kim stated that she wanted to create a 90-day limit for both hosted and non-hosted units. She was

interested in the funding to support the program and wanted to hear about how DBI's codes would come into play. Supervisor Chiu offered to bring the DBI director to a LU hearing the next week, but Supervisor Kim felt more time would be needed to resolve the outstanding questions. She referenced the 16 modifications of this commission. Supervisor Cohen suggested a two-week continuance and the committee voted to reconsider the issue on September 29.

FULL BOARD OF SUPERVISORS: No Planning items

INTRODUCTIONS:

140982 Arcades in the Upper Market Street Neighborhood Commercial Transit District. Ordinance amending the Planning Code to permit arcades in the Upper Market Street Neighborhood Commercial Transit District.

BOARD OF APPEALS:

Zoning Administrator Scott Sanchez:

The Board of Appeals did meet last night. One item that might be of interest to the Commission is 70 Crestline. This was before you as a Discretionary Review at the end of 2012. It was staff initiated. Staff had recommended denial of the application. The Commission approved it. It was for new construction of a 4-unit building in Twin Peaks. Subsequently to that, the neighbors who were opposed to the project appealed it to the Board of Appeals. The Board of Appeals denied the application. There was some question about whether or not there were some limitations associated with the subdivision that established this property back in 1962 and Public Works had issued a condition saying that you could not build on this area. They subsequently revoked that and asked the Planning Department and Building Department to look into it further. We researched that and actually did find evidence through minutes from 1962 Planning Commission hearings which did indicate that this was to be maintained as open space. So, we conditioned the subdivision, as such, that was issued earlier this year and it was not appealed to the Board of Supervisors, as such conditions could be. So those conditions are in full effect. Last night was a rehearing request brought by the project sponsor. The Board's noting that these conditions are in place and that they had previously denied the permit, denied the rehearing request, so their denial of the application stands and the project could not move forward. I'm available for any questions.

HISTORIC PRESERVATION COMMISSION:

Preservation Coordinator Tim Frye:

Good afternoon, Commissioners, Tim Frye, here to share with you the results of yesterday's Historic Preservation Commission hearing. To begin though, I do want to mention that Commissioner President Hasz appointed two members to a Cultural Heritage Assets Subcommittee at yesterday's hearing. Commissioners Hyland and Matsuda will form that Committee. I'm sure if we asked the Commission they would be delighted to have a member of the Planning Commission as part of that Subcommittee. They intend on meeting over the next month and provide specific recommendations how the Department and the Commissions can implement some of the recommendations in the San Francisco Architectural Heritage White Paper on Cultural Heritage Assets, but we are happy to relay the information to the Commission, if this Commission does want to participate in that Subcommittee. The hearing started with a meeting of the Architectural Review Committee. They reviewed the design for the Van Ness BRT that's going to run in front of City Hall and in the portion located within the Civic Center Landmark District. As you are probably aware, the Historic Preservation Commission, as well as, the Civic Design Review Committee of the Arts Commission is reviewing the design for the public realm improvements and platforms proposed by MTA as part of Van Ness BRT. There are still several meetings, design review meetings that need to take place before either Committee or either Commission make a final recommendation and we'll keep you posted on those results. Ultimately though, the Commissioners, the Design Review Committee was supportive of the project. They did request some more information in particular around replacement trees, minimizing some of the details of the platforms. They had some questions about the canopy structures and the wind screens. We will be preparing a memo of the Architectural Review Committee's recommendations. If you are interested we can certainly forward you a copy as well. The Commission then moved on to approve several Certificates of Appropriateness. Several were located in Liberty Hill Landmark District, one in the Alamo Square Landmark District, and one in the Jackson Square Landmark District. All were approved as recommended by staff. Finally, Preservation staff gave an overview of all Planning Code incentives related to preservation. It was more of an informational presentation to set the stage for the review of Supervisor Cohen's legislation regarding PDR conversion to office in landmark properties. Ultimately, during the discussion of the proposed legislation, the HPC continued the item to its October 2nd hearing. In the interim they are interested in providing a letter to this Commission for your consideration, just so you know some of the thoughts going on in their heads about how they believe the legislation could be more effective. Some of the questions they still have and staff is working on some response right now is, they want to be as useful as possible to the Zoning Administrator, Department staff, and this Commission as the final deciders on whether or not this PDR space should be converted to office. They do have some questions about process. They do want to have a better idea of what's expected to them and they discussed how they could provide some criteria so they are able to discuss the merits of proposals for buildings and really how these buildings could be rehabilitated provided that the PDR is converted to office. Like I said, we'll be providing this Commission a letter before your hearing on the item on October 2nd and they'll be having a discussion the day before to provide you some more robust recommendations on how they think they can be more effective in that process. Finally, just to let you know, at the beginning of the summer we presented an overview of the

Draft Preservation Element as part of the General Plan. The HPC spent the entire summer reviewing the Draft Preservation Element. We had our open house at the Old Mint last week. We had a great turnout; there were about 50 participants, a lot of folks providing great recommendations on how to make that part of the General Plan an effective document. We had various organizations, neighborhood organizations, SPUR, the National Trust and the Presidio Trust attended. There were a variety of preservation and design firms that participated and we are still continuing to receive written comments. Once we have compiled those comments, we will certainly forward them to you, as well as, the HPC before we bring that to you for adoption, we believe in early 2015. That concludes my comments to you and I'm happy to entertain any questions. Thank you.

E. GENERAL PUBLIC COMMENT – 15 MINUTES

At this time, members of the public may address the Commission on items of interest to the public that are within the subject matter jurisdiction of the Commission except agenda items. With respect to agenda items, your opportunity to address the Commission will be afforded when the item is reached in the meeting. Each member of the public may address the Commission for up to three minutes.

SPEAKERS: Patricia Vaughey – Renovations to historic buildings
 John Elberling – Everyday solutions and communicating
 Dino Adelfio – Policy from N. European cities to America

F. REGULAR CALENDAR

The Commission Hearing Procedures provide for presentations by staff, followed by the project sponsor team, followed by public comment for and against the proposal. Please be advised that the project sponsor team includes: the sponsor(s) or their designee, lawyers, architects, engineers, expeditors, and/or other advisors.

11. 2014.1193T (D. SANCHEZ; (415)
 575-9082)

ARCADES IN THE HAIGHT STREET NCD [BOARD FILE 140804] - Ordinance amending the Planning Code to permit arcades in the Haight Street Neighborhood Commercial District and update references in the Planning Code to Arcade regulations in the Police Code, affirm the Planning Department's determination under the California Environmental Quality Act, and make Planning Code Section 302 findings and findings of consistency with the General Plan and priority policies of Planning Code Section 101.1.

Preliminary Recommendation: Adopt a Recommendation for Approval with Modifications

SPEAKERS: + Conner Johnson, Aide to Supervisor Breed – Arcades
 + (M) Speaker – Assett to the neighborhood
 + Eric Wagensenner – Pinball

ACTION: Adopted a Recommendation for Approval as amended to include: "for the purposes of the Planning Code"

AYES: Wu, Fong, Hillis, Johnson, Moore, Richards

RESOLUTION: 19239

12. 2011.1388E (K. UCHIDA; (415)
 575-9048)

110 THE EMBARCADERO/115 STEUART STREET - through-lot fronting the west side of The Embarcadero and east side of Steuart Street between Mission and Howard Streets, Lot 002 in Assessor's Block 3715 - Appeal of Preliminary Mitigated Negative Declaration for: 1) vertical addition of a third story, roof deck, and circulation penthouse to the existing two-story-over-basement, 19,374 square-foot vacant building - a net increase of 4,445 square feet, raising the building's height from 35 feet to 51 feet;

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Memo. APPEAL 2011-1388E

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APPEAL OF FINAL MITIGATED NEGATIVE DECLARATION 110 The Embarcadero/115 Steuart Street

DATE: January 16, 2015

TO: Angela Calvillo, Clerk of the Board of Supervisors

FROM: Sarah B. Jones, Environmental Review Officer – (415) 575-9034
Kansai Uchida, Case Planner – (415) 575-9048

RE: File No. 141320, Planning Case No. 2011.1388E
Appeal of Final Mitigated Negative Declaration for the 110 The Embarcadero/115
Steuart Street Project

HEARING DATE: January 27, 2015

PROJECT SPONSOR: Piper Kujac, Owner's Representative and Building Project Manager, The
Commonwealth Club of California

APPELLANT: David Osgood, on behalf of Rincon Point Neighbors Association

INTRODUCTION:

This memorandum is a response ("Appeal Response") to the letter of appeal ("Appeal Letter") to the Board of Supervisors (the "Board") regarding the Planning Department's (the "Department") issuance of a Final Mitigated Negative Declaration ("FMND") under the California Environmental Quality Act ("CEQA Determination") for a project at 110 The Embarcadero/115 Steuart Street (the "project").

The Preliminary Mitigated Negative Declaration ("PMND") for the project was published on June 25, 2014. David Osgood of Rincon Point Neighbors Association filed an appeal of the PMND on July 15, 2015. At the appeal hearing, held on September 18, 2014, the Planning Commission (the "Commission") affirmed the Department's decision to issue a MND for the project. The FMND has now been appealed to the Board by the same Appellant that appealed the PMND to the Commission.

The decision before the Board is whether to uphold the Department's decision to issue a MND and deny the appeal, or to overturn the Department's decision to issue a MND and return the project to the Department staff for further environmental review.

SITE DESCRIPTION:

The project site, at 110 The Embarcadero/115 Steuart Street, is a through lot on the west side of The Embarcadero and the east side of Steuart Street. The site is within the block bounded by The Embarcadero, Mission Street, Steuart Street, and Howard Street in the Financial District. It is within the C-3-O (Downtown – Office) Use District and 84-X Height and Bulk District. The project site presently contains a two-story-over-basement, 19,374-square-foot (sf), wood-frame commercial building constructed circa 1910. The building is currently vacant.

PROJECT DESCRIPTION:

An environmental evaluation application (Case No. 2011.1388E) for the project at 110 The Embarcadero/115 Steuart Street was filed by the project sponsor, Piper Kujac of The Commonwealth Club of California, on August 1, 2013. The project would involve interior improvements, rehabilitation, and the vertical addition of a third story (5,085 sf), circulation penthouse, and roof deck to the existing building for use as offices and assembly functions for the Commonwealth Club of California, which would move from its current 595 Market Street location. As a result of the project, the building would have 23,819 sf of floor space, of which 11,964 sf would be for assembly/circulation use, 6,770 sf would be for storage, and 5,085 sf would be for office use. The net addition to the building would total 4,445 sf. The total height of the building from street level to the top of the finish roof would be 51'-1" (62'-10" including rooftop features normally exempt from height calculations). The overall shell of the existing building would be retained and it would remain a through lot with exposed facades on The Embarcadero and Steuart Street. The cladding materials of the Embarcadero façade would be removed. The project would preserve the Steuart Street façade, which is associated with significant events in labor history that occurred in 1934. The new third story would be set back between 6'-8" (at the south side of the building) and 11'-6" (at the north side of the building) from the Steuart Street frontage as part of the façade preservation. The project would also include a plaque on the exterior of the Steuart Street façade dedicated to the labor history that occurred along Steuart Street in 1934. In the building, the Commonwealth Club would curate an interpretive display of historic archival materials related to labor events in 1934, including the building's association with the 1934 Longshoreman's Strike.

The project requires the following project approvals, with the Planning Code Section 309 approval (Downtown Project Authorization) by the Planning Commission identified as the Approval Action under Chapter 31 of the San Francisco Administrative Code for the whole of the project:

- Planning Code Section 309 approval by the Planning Commission (received November 13, 2014)
- Building Permit approval by the Department of Building Inspection

APPELLANT ISSUES AND PLANNING DEPARTMENT RESPONSES:

The Appeal Letter (attached) includes the Appellant's concerns regarding the project. These concerns are related to: 1) the analysis of the project's potential effects on historic resources; 2) the potential for the

project to affect neighborhood character (land use); and 3) the analysis of the proposed project's potential to introduce bird hazards (effects on biological resources).

HISTORIC RESOURCES

Issue 1: The appellant asserts that the project would cause a substantial adverse change to a historic resource and that an Environmental Impact Report should be prepared, citing the building's association with labor history and the proposed changes to the Embarcadero façade.

The appellant claims that the subject building is eligible for listing on the California Register of Historic Resources (CRHR) under Criteria 1 and 2 due to its association with Harry Bridges, the International Longshoremen's Association (ILA), and the 1934 waterfront and general strikes in San Francisco. The appellant also claims that eligibility for listing on the CRHR under Criterion 2 requires the building to be preserved. The appellant further asserts that the MND ignores historic events associated with the subject building, and that the MND incorrectly concludes the historic significance of the property is more closely tied to the Steuart Street façade. To support this assertion, the appellant cites historic events that occurred along the Embarcadero.

Response 1:

As discussed on pages 24 through 28 of the FMND (attached), the environmental review process for the proposed project included thorough review and analysis of potential impacts to historic resources, including the subject property. The Department agrees with the appellant that the subject property is a historic resource. Page 25 of the FMND indicates that the property was found in the Department's Historic Resource Evaluation Response (HREER, attached) to be significant for its association with the 1934 Longshoreman's Strike and related events, including the Bloody Thursday shootings that occurred outside the subject building and the subsequent public funeral procession that started from the Steuart Street side of the subject building. The historic context of the building as the headquarters for the San Francisco Chapter of the International Longshoreman's Association (I.L.A.) is well established on pages 25 and 26 of the FMND, as well as in the Historic Resource Evaluation (HRE, attached) and HREER prepared for the project. As such, as noted on page 25 of the FMND, the building was found to be eligible for listing in the California Register under Criterion 1 (association 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). Although the property has not been listed as a San Francisco Landmark under Article 10 of the Planning Code nor has it been listed in the National Register of Historic Places or other official national, state or local inventory of historic properties, for the purposes of the environmental review for the proposed project, the subject property is considered a historic resource under CEQA.

As stated in the FMND, the building was not found to be eligible for listing in the California Register under Criterion 2 (Persons) due to lack of direct association of the subject building with Harry Bridges or any other person important to local, state or national history. Several steps are involved in determining whether a property is significant for its associative values under Criterion 2: First, the level of importance of the individual must be assessed; then the amount of time and nature of the association of the individual with the property must be ascertained; then the property must be compared to other properties associated with the individual; and lastly, it needs to be demonstrated that a building is directly associated with the productive life of a significant individual and this association needs to be

substantiated through documentation. The HRE technical study (dated November 26, 2013) and Request for Information Memorandum (dated May 22, 2008) prepared by Page & Turnbull consulted numerous sources, including: historical newspaper articles, oral history interviews with Harry Bridges and other ILA Union members the labor archives at San Francisco State University, and other books and articles about the 1934 Strike and general ILA labor history. The findings of the technical study determined that the property is not significantly associated with Bridges or any other person such that it would qualify for listing in the California Register under the Persons Criterion (Criterion 2). The Department agrees with the appellant that Harry Bridges was an important individual for his role as a strike organizer in 1934 and his long career as a union leader after the events of 1934. The location of the Union Hall at 113 Steuart Street from 1933-1935 does not have a specific association with Harry Bridges or any individual union member or leader, but is more generally associated with the 1934 Strike and actions of the Union during and after the strike when the victim's bodies laid in state in the Union Hall. The location of the ILA Union Hall on the second floor of 113 Steuart Street during the 1934 Strike has already been determined to be significant under California Register Criterion 1 (Events), which is the appropriate criteria under which to categorize this significance.

Given that the analysis considered the connection between Harry Bridges and the subject property, further substantial evidence would be needed to support a different determination regarding the eligibility of the building under Criterion 2. No such documentary evidence has been presented to demonstrate a direct significant association between Bridges and the subject property. However, the HRER still defines the building as an eligible historic resource under Criterion 1 (Events) and evaluates the proposed project for its potential to impact the eligible historic resource. Even if the building had been determined to also be eligible for listing in the California Register under Criterion 2, the evaluation of impacts to historic architectural resources would have been conducted in the same manner with regard to character-defining features, and this would not change the conclusion that the proposed project would not have a significant adverse impact on the eligibility of the historic resource. The subject building was determined to be an individual historic resource for the purposes of CEQA.

As stated on page 7 of the HRER, "... a high degree of alteration has occurred on both façades since the period of significance and many features that existed in 1934 have already been removed or altered. In particular, the ground floor of each façade has been removed in its entirety." Though the Embarcadero façade retains character-defining features from the period of significance, the Steuart Street façade is more directly associated with the significance of the building under Criterion 1 as the site of the Longshoreman's Strike and proceeding funeral procession, and the location of the entrance to the ILA Union hall. A determination of significance under Criterion 2 would not change the conclusion regarding character-defining features.

The FMND therefore defines the building as an eligible historic resource and finds that removal of the character-defining features of the Embarcadero façade would not impair the integrity of the building and its ability to convey significance under Criterion 1, which is most closely association with the Steuart Street façade. The FMND finds that the Steuart Street façade and the building's ability to convey significance under Criterion 1 would be preserved as part of the proposed project in the following ways:

- The proposed project would retain the character - defining features of the Steuart Street façade.
- The proposed third story addition to the building would be set back from the Steuart Street façade by 6' - 8" at the south side of the building and 11' - 6" at the

north side of the building.

- The proposed project would include a plaque on the exterior of the Steuart Street façade, central to the façade near the building entrance, dedicated to the labor history that occurred along Steuart Street in 1934, and
- In the building, the Commonwealth Club would specifically curate historic archival materials related to the labor events in 1934, including the building's association with the 1934 Longshoreman's Strike, with the objective of educating the public about the property's historic themes, associations, and lost character defining features within broader historical, social, and physical landscape contexts.

As such, the proposed project would preserve the Steuart Street façade, and removal of the Embarcadero façade would not impair the significance of the historic resource. The FMND therefore correctly concludes that the proposed project would not cause a significance adverse impact to historic resources. Because there is no substantial evidence supporting a fair argument that the proposed project could have a significant impact, an Environmental Impact Report is not required.

Issue 2: The appellant asserts that the project would have a significant impact on the existing character of the project's vicinity, which includes buildings over 100 years in age, and that the subject block should be considered a historic district. The appellant cites concerns regarding the project's design, which would include a glass curtain wall on The Embarcadero façade, and asserts that the design would be incompatible with the project's surroundings.

Response 2:

The Department disagrees with the appellant that the subject property is within a potential or eligible historic district. The HRE provides a thorough analysis of the surrounding historic resources in proximity to the subject property. The subject block has not been identified as part of a historic district and no substantial evidence has been submitted into the record to provide a basis for eligibility of the subject block as a historic district of post-earthquake construction. Although three of the nine buildings on this block date to the post-earthquake period, all of the buildings have experienced major alterations since their initial construction and do not appear to retain historic integrity. In order to qualify as an eligible historic district, the subject block would need to contain a significant concentration of properties associated with a theme of history. Moreover, even if they had integrity (which the Department found they do not), these three out of nine properties would not amount to a significant concentration. As such, no historic district of Post-earthquake construction was found to exist in the area.

The subject property is located across The Embarcadero from the Port of San Francisco Historic District, which is listed on the National Register of Historic Places. The proposed project is consistent with the overall scale and massing of buildings within the district. There are many contemporary buildings along the Embarcadero, and the proposed contemporary Embarcadero façade would be compatible with the neighborhood context. As noted on pages 28-29 of the HRE and confirmed in the HRER, the project was found not to have an effect on the Port of San Francisco Embarcadero Historic District. The HRE states that "The Agriculture Building is the only building within the Port of San Francisco Embarcadero Historic District that is within a close distance to 110 The Embarcadero." The HRE further details that: "The Agriculture Building is located across The Embarcadero to the east of the project site. The proposed

project would not have a direct impact on this historic resource, since the height is commensurate with surrounding buildings and the proposed style of the Embarcadero façade maintains a commercial aesthetic and a traditional division of parts, albeit through the use of contemporary materials. The proposed project would not change the Agriculture Building's ability to relate to nearby Port-associated buildings and structures on the east side of the Embarcadero. Thus, it does not appear to affect the Agriculture Building's eligibility for listing in any national, state, or local historical registers." Based on these observations, the HRE concludes that: "... The proposed project does not affect the essential form and integrity of the Port of San Francisco Embarcadero Historic District, and would therefore not affect the historic district's listing in the National Register." No other historic districts are located in proximity to the proposed project site. Therefore, the FMND correctly concludes that the proposed project would not have a significant impact on any listed or eligible historic districts.

Issue 3: The appellant asserts that a Board of Supervisors motion regarding a previous proposed project on the same parcel, dated March 31, 2009, identifies some of the same issues pertaining to historic resources raised in his letter as significant. The appellant's letter cites findings from the Board's 2009 motion indicating that the subject building is a historic resource, retains integrity, is proximate to other historic resources that retain integrity, and has undergone alterations that are largely reversible.

Response 3:

The Department agrees with the finding in the 2009 Board of Supervisors Motion (Board of Supervisors Motion No. 09-62) that the building is eligible for listing in the California Register under Criterion 1 for its association with the 1934 Longshoreman's Strike. The HRER (dated July 15, 2008) prepared for the previous proposed project's Mitigated Negative Declaration (MND) acknowledges the significance of the subject property under California Register Criterion 1 (Events), but found the existing building does not have sufficient integrity to convey this significance and was determined not to be an eligible historic resource. The San Francisco Board of Supervisors overturned this finding in Motion No. M09-62 (dated March 31, 2009), when the board determined that there was substantial evidence in the record that the building retains integrity, including information contained in a letter and testimony from Bradley Wiedmaier and in a letter and testimony from Michael R. Corbett. For the current proposed project's MND (the FMND in question for this appeal), the building was treated as an eligible historic resource and historic resource impacts were assessed. Therefore, the findings of the 2009 Board of Supervisors Motion informed the current environmental review.

The Board's 2009 motion was for an appeal of a different project, which was previously proposed on the same parcel. The previous proposed project was for the demolition of the existing building and construction of a new 123-foot-tall/10-story building and would have been taller than that proposed in the current project (approximately 51 feet/3 stories). The 2009 findings about the potential CEQA impacts of the previous proposed project are not relevant to the environmental review of the current proposed project. The current MND concludes that the proposed rehabilitation and addition project would not impair the eligible historic resource such that it would no longer be eligible for listing in the California Register under Criterion 1.

NEIGHBORHOOD CHARACTER (LAND USE)

Issue 4: The appellant asserts that a Board of Supervisors motion regarding a previous proposed project on the same parcel, dated March 31, 2009, identifies some of the same issues pertaining to neighborhood character raised in his letter as significant. The appellant's letter presents the following quotation from the 2009 Board of Supervisors motion: "Planning Department staff found the project inconsistent with Planning Code Section 101.1(b)(2), which calls for conserving and protecting ... neighborhood character."

Response 4: The previous proposed building (123 feet in height/10 stories) would have been taller than the current proposed project (approximately 51 feet/3 stories). The 2009 findings about the previous proposed building are not relevant to the environmental review of the current proposed project.

Board of Supervisors Motion No. 09-62 cited Planning Code Section 101.1(b)(2) with respect to the height of a previous proposed project on the subject parcel, a ten-story building that would have measured 123 feet in height. The 2009 motion indicated that the then-proposed 123-foot building, in an 84-X height and bulk district where the step-down to the water is to be preserved, could compromise the character of the area and overwhelm adjacent structures. The cited characteristics of the previous proposed project that resulted in inconsistency with Planning Code Section 101.1(b)(2) do not pertain to the current proposed project. As discussed on pages 19 and 21 of the FMND, the current proposed project would result in a total building height of three stories (approximately 51 feet). The FMND correctly reports that building heights on the subject block range from three to eight stories, and that the current proposed project would not exceed the scale of the surrounding buildings. The 2009 findings addressed the previous proposed project and are not relevant to the environmental review of the current proposed project. Additionally, compliance with height and bulk district restrictions is primarily a Planning Code compliance issue, and does not in and of itself constitute a significant impact under CEQA.

BIOLOGICAL RESOURCES

Issue 5: The appellant asserts that a Board of Supervisors motion regarding a previous proposed project on the same parcel, dated March 31, 2009, identifies some of the same issues pertaining to bird hazards raised in his letter as significant. The appellant's letter presents the following quotation from the 2009 Board of Supervisors motion: "Written and oral testimony presented at the hearing identified the potentially significant impact on birds flying into the "mostly glass" walls..."

Response 5:

The Board's 2009 motion was for a different project previously proposed on the same parcel, which would have involved demolition of the existing building and construction of a new 10-story building. As discussed in the FMND, the current proposed project involves a one-story addition to the existing building and is required to comply with San Francisco's Standards for Bird-Safe Buildings.

San Francisco's Standards for Bird-Safe Buildings, as adopted by the Planning Commission and Board of Supervisors in 2011 (Ordinance No. 199-11) after the appeal of the previous proposed project, apply to new building construction, alterations of existing buildings, and replacement facades. Pages 76 and 77 of the FMND correctly state that the project would be subject to these standards. The FMND indicates that

the project is sited in an area with location-related bird hazards due to proximity to San Francisco Bay, recognizes free-standing glass walls as a potential hazard to birds, and states that the Standards for Bird-Safe Buildings would require treatment of 100 percent of the glazing on such walls and conformance to lighting specifications that would serve to reduce bird strikes. Because the project would be required to comply with City-adopted regulations for bird-safe buildings, the project would not be expected to interfere with the movement of native resident or wildlife species or corridors. The FMND, therefore, correctly concludes that the project's potential bird hazard impact would be less than significant.

CONCLUSION

The Department conducted an in-depth and thorough analysis of the project at 110 The Embarcadero/115 Steuart Street, pursuant to CEQA Guidelines. The Appellant has not submitted any evidence that the project would result in any significant impacts under CEQA that cannot be reduced to a less-than-significant level. For the reasons stated in this Appeal Response and the FMND, the Department finds that the FMND fully complies with the requirements of CEQA and that the FMND was appropriately prepared.



SAN FRANCISCO PLANNING DEPARTMENT

Mitigated Negative Declaration

PMND Date: June 25, 2014
Case No.: **2011.1388E**
Project Title: **110 The Embarcadero/115 Steuart Street**
BPA No.: 201312174360
Zoning: C-3-O (Downtown Office) Use District
84-X Height and Bulk District
Block/Lot: 3715/002
Lot Size: 6,302 square feet
Project Sponsor: Piper Kujac, Owner's Representative and Building Project Manager, The Commonwealth Club of California (415) 597-6733
Lead Agency: San Francisco Planning Department
Staff Contact: Kansai Uchida – (415) 575-9048
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PROJECT DESCRIPTION:

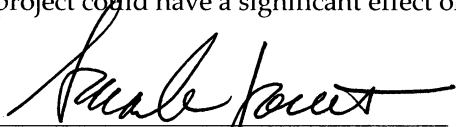
The project site, at 110 The Embarcadero/115 Steuart Street, is a through lot on the west side of The Embarcadero and the east side of Steuart Street. The site is within the block bounded by The Embarcadero, Mission Street, Steuart Street, and Howard Street in the Financial District. The project site presently contains a two-story-over-basement, 19,374-square-foot (sf), wood-frame commercial building constructed circa 1910. The building is currently vacant.

The proposed project would involve interior improvements, rehabilitation, and the vertical addition of a third story (5,085 sf), circulation penthouse, and roof deck to the existing building for use as offices and assembly functions for the Commonwealth Club of California, which would move from its current 595 Market Street location. As a result of the proposed project, the building would have 23,819 sf of floor space, of which 11,964 sf would be for assembly/circulation use, 6,770 sf would be for storage, and 5,085 would be for office use. The net addition to the building would total 4,445 sf. The total height of the building from street level to the top of the finish roof would be 51'-1" (62'-10" including rooftop features normally exempt from height calculations). The overall shell of the existing building would be retained and it would remain a through lot with exposed facades on The Embarcadero and Steuart Street. The cladding materials of the Embarcadero façade would be removed. The project would preserve the Steuart Street façade, which is associated with the significant historic events of 1934. The new third story would be set back between 6'-8" (at the south side of the building) and 11'-6" (at the north side of the building) from the Steuart Street frontage as part of the façade preservation. The proposed project would also include a plaque on the exterior of the Steuart Street façade dedicated to the labor history that occurred along Steuart Street in 1934. In the building, the Commonwealth Club would specifically curate historic archival materials related to labor events in 1934, including the building's association with the 1934 Longshoreman's Strike.

FINDING:

This project could not have a significant effect on the environment. This finding is based upon the criteria of the Guidelines of the State Secretary for Resources, Sections 15064 (Determining Significant Effect), 15065 (Mandatory Findings of Significance), and 15070 (Decision to prepare a Negative Declaration), and the following reasons as documented in the Initial Evaluation (Initial Study) for the project, which is attached. Mitigation measures are included in this project to avoid potentially significant effects. See Section F, Mitigation Measures.

In the independent judgment of the Planning Department, there is no substantial evidence that the project could have a significant effect on the environment.


SARAH B. JONES
Environmental Review Officer

September 30, 2014
Date of Issuance of Final Mitigated
Negative Declaration

cc: Piper Kujac, Project Sponsor
Pilar LaValley, Current Planner
Master Decision File

INITIAL STUDY TABLE OF CONTENTS

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Initial Study

110 The Embarcadero/115 Steuart Street

Planning Department Case No. 2011.1388E

A. PROJECT DESCRIPTION

Project Location and Site Characteristics

The project site at 110 The Embarcadero/115 Steuart Street is located in San Francisco's Financial District. The 6,302 square foot (sf) site (Assessors Block 3715, Lot 002) is on the block bounded by Mission Street to the north, The Embarcadero to the east, Howard Street to the south, and Steuart Street to the west (see **Figure 1, Project Location**). The site is on a through lot, with frontages along the west side of The Embarcadero and the east side of Steuart Street.

The project site is located on The Embarcadero, the primary transportation corridor along San Francisco's bay waterfront, and is visible from San Francisco Bay. The topography on the project site is flat, with no substantial grade change between the Embarcadero and Steuart Street frontages. There are two London plane trees on the sidewalk along the Embarcadero frontage, and four New Zealand Christmas trees on the sidewalk along the Steuart Street frontage. All six trees are defined as significant trees under the City's Public Works Code¹ (see **Figure 2, Project Site Photos – Existing Conditions**).

The site currently contains a 19,374 sf, two-story-over-basement, wood frame commercial building constructed circa 1910 that previously housed retail, office, and assembly uses. The height of the building reaches 35 feet above street level, plus rooftop parapets, skylights, and mechanical equipment. It is built in a utilitarian 20th-century commercial architectural style with a rectangular floor plan, stucco cladding, concrete panels, window awnings, and Classical Revival ornamentation on the upper level of the Embarcadero façade. The building covers the entire lot, and no off-street parking exists on the project site. The building is presently vacant, and has plywood coverings over both facades at street level to minimize intrusion and vandalism. Many of the ground floor interior features of the building have been removed.

The building has been determined to be eligible for the California Register of Historical Resources under Criterion 1 (association with events that have made a significant

¹ Public Works Code Section 801, et seq. A significant tree is a tree with diameter at breast height (4.5 feet above the ground surface surrounding the tree) greater than 12 inches, height greater than 20 feet, or canopy greater than 15 feet.

contribution to the broad patterns of California's history and cultural heritage), particularly for its association with the events of the 1934 Longshoremen's Strike.²

Proposed Project

The proposed project would involve interior improvements, rehabilitation, and the vertical addition of a third story (5,085 sf), circulation penthouse, and roof deck to the existing building for use as offices and assembly functions for the Commonwealth Club of California, which would move from its current 595 Market Street location. As a result of the proposed project, the building would have 23,819 sf of floor space, of which 11,964 sf would be for assembly/circulation use, 6,770 sf would be for storage, and 5,085 would be for office use. The net addition to the building would total 4,445 sf. The proposed height of the building from street level to the top of the finish roof would be 51'-1" (62'-10" including parapets, rooftop access, and mechanical equipment, which are excluded from building height calculations for planning purposes). Beyond addition of elevator shafts, no expansion or deepening of the existing basement would occur.

The overall shell of the existing building would be retained and it would remain a through lot with exposed facades on The Embarcadero and Steuart Street. The cladding materials of the Embarcadero façade would be removed. The height of the first floor would remain at 15'-10.5", and the third floor plate would be adjusted so that the height of the second floor would extend to 21 feet to accommodate a new auditorium. The height of the new third floor would be 14'-2.5", and the height to the top of the rooftop mechanical equipment would be 11'-9" (see **Figure 3, Proposed Site Plan; Figure 4, Proposed Floor Plans; and Figure 5, Proposed Elevations**). As part of the proposed project, the four existing street trees along Steuart Street would be removed and replaced with new trees during construction, pursuant to Department of Public Works (DPW) review and approval. The two existing trees along The Embarcadero would be protected and maintained.

The project would preserve the Steuart Street façade, which is associated with the significant historic events of 1934. The new third story would be set back between 6'-8" (at the south side of the building) and 11'-6" (at the north side of the building) from the Steuart Street frontage as part of the façade preservation (see **Figure 6a, Proposed Steuart Street Façade**). The proposed project would also include a plaque on the exterior of the Steuart Street façade dedicated to the labor history that occurred along Steuart Street in 1934. This plaque would be located central to the façade, near the Steuart Street building entrance, where it would be prominently visible to passersby. In the building, the Commonwealth Club would specifically curate historic archival materials related to labor events in 1934, including the building's association with the

² Historic Resource Evaluation Response, December 13, 2013. This document is available for public review at the San Francisco Planning Department, 1650 Mission Street, Suite 400, as part of Case File 2011.1388E.

1934 Longshoreman's Strike. Historic photographs of the existing building may be used to illustrate the property's history, with the objective being to educate the public about the property's historic themes, associations, and lost character-defining features within broader historical, social, and physical landscape contexts.

Project construction would occur over 14 months, and would be phased as follows: demolition and salvage; shoring and excavation; structural and building shell; and interior build-out. Construction equipment would include loaders, dump trucks, compressors, loaders/backhoes, mix trucks, a crane, debris and delivery trucks, a temporary elevator, and a scissor lift.

Project Approvals

The project would require a Planning Code Section 309 (Downtown Project Authorization) review by Planning Department staff and a building permit. Approval of the Section 309 review by the Zoning Administrator or Planning Commission is the Approval Action for the whole of the proposed project.

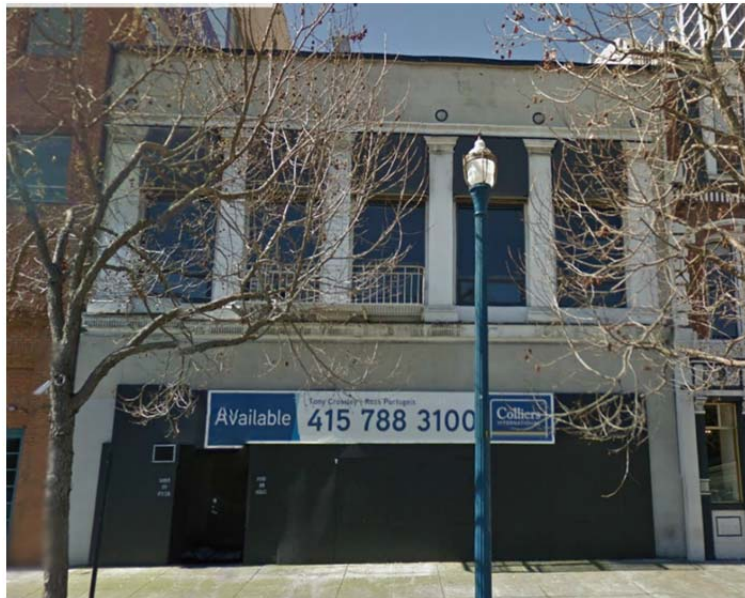
Figure 1: Project Location



Figure 2: Project Site Photos – Existing Conditions



115 Steuart Street façade



110 The Embarcadero façade

Figure 3: Proposed Site Plan

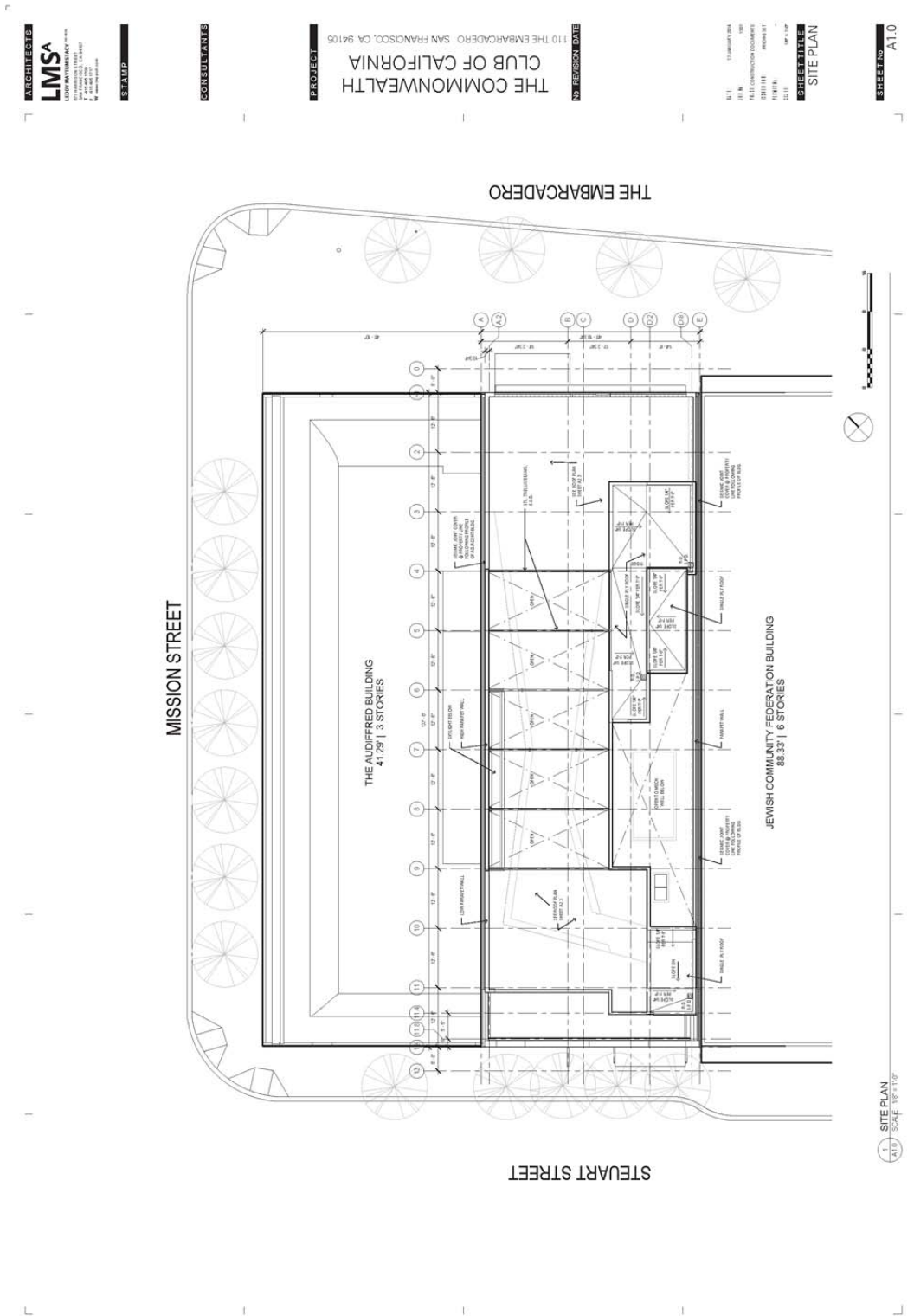


Figure 4a: Proposed Floor Plans (1 of 3)

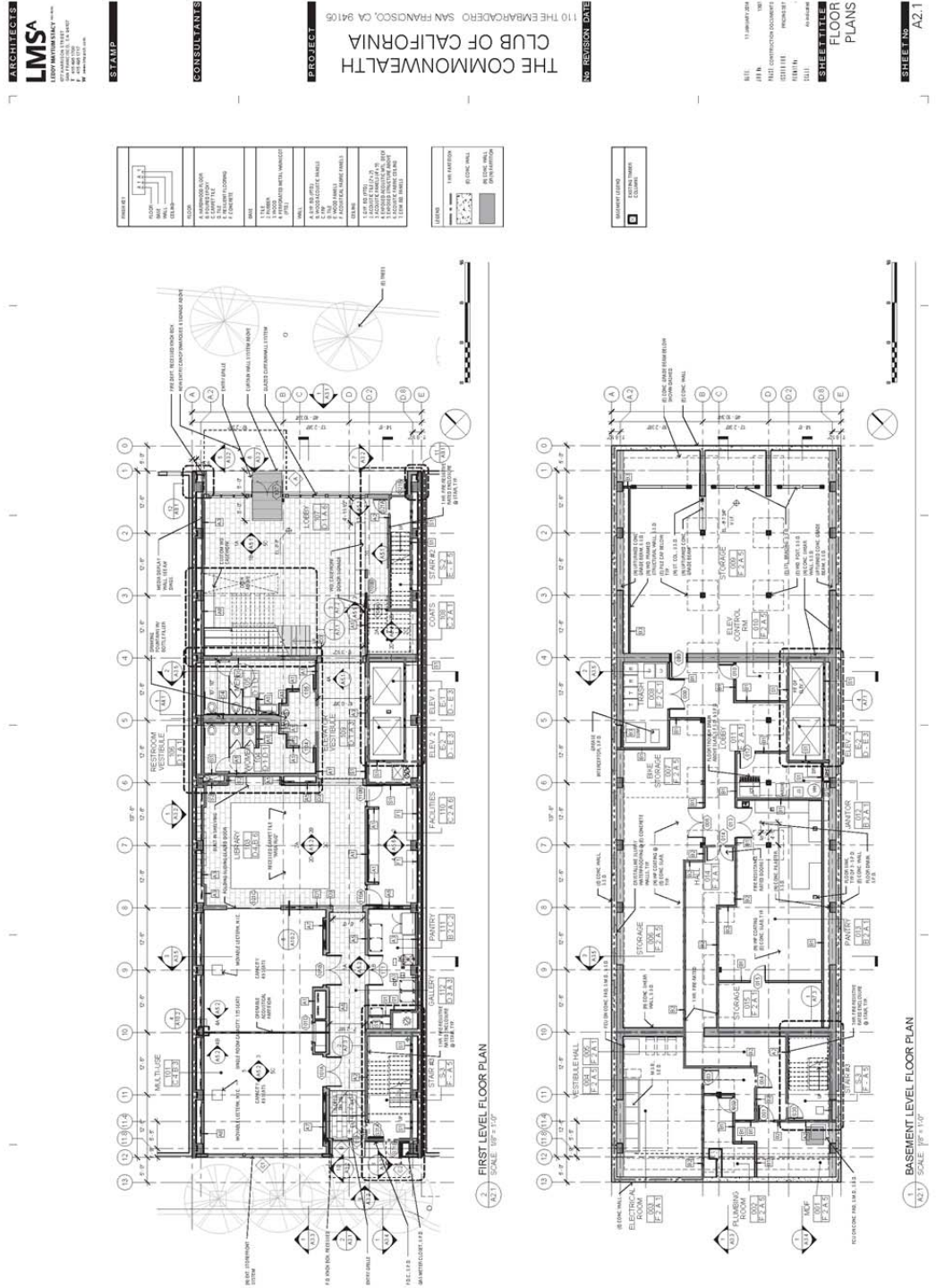


Figure 4b: Proposed Floor Plans (2 of 3)

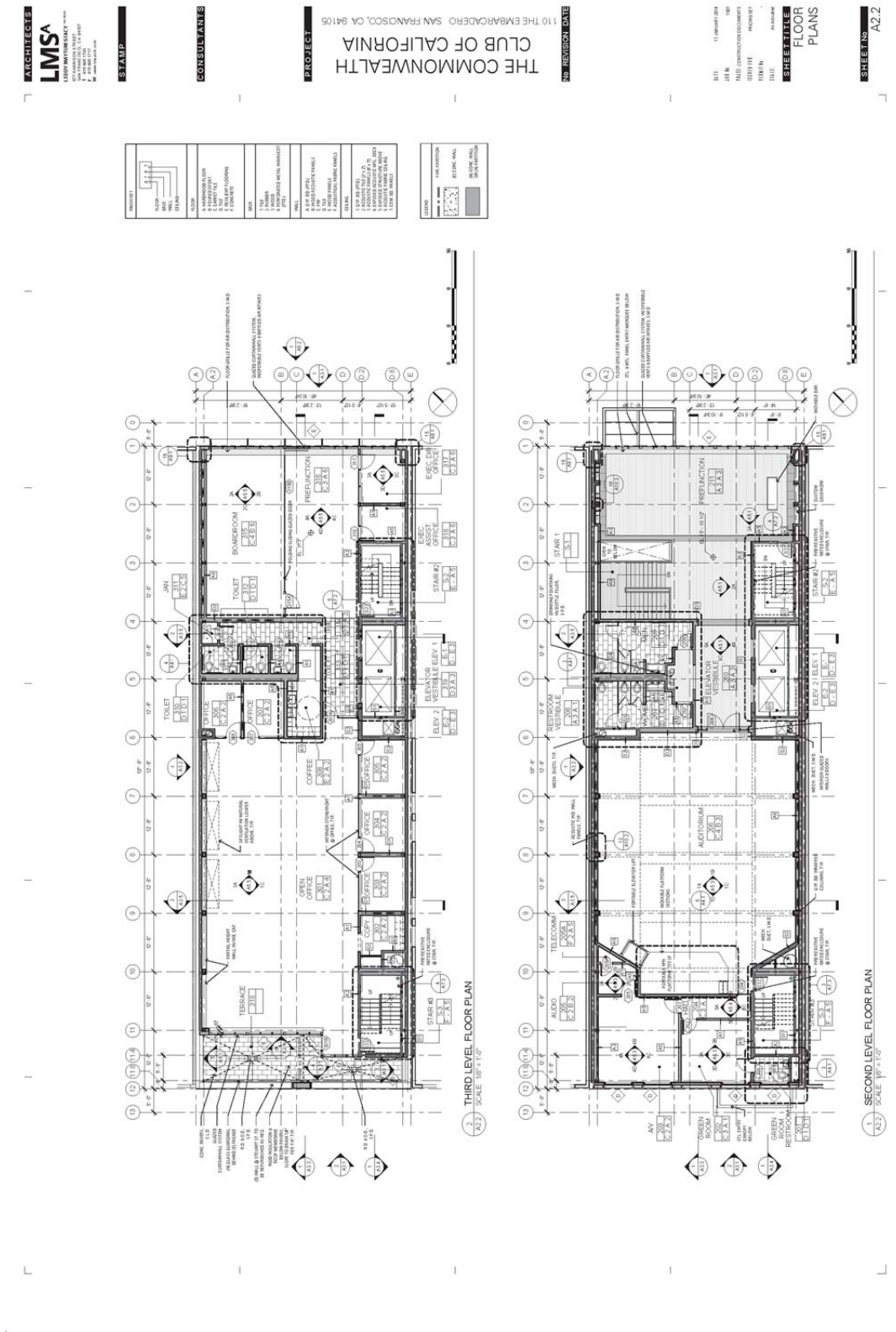


Figure 4c: Proposed Floor Plans (3 of 3)

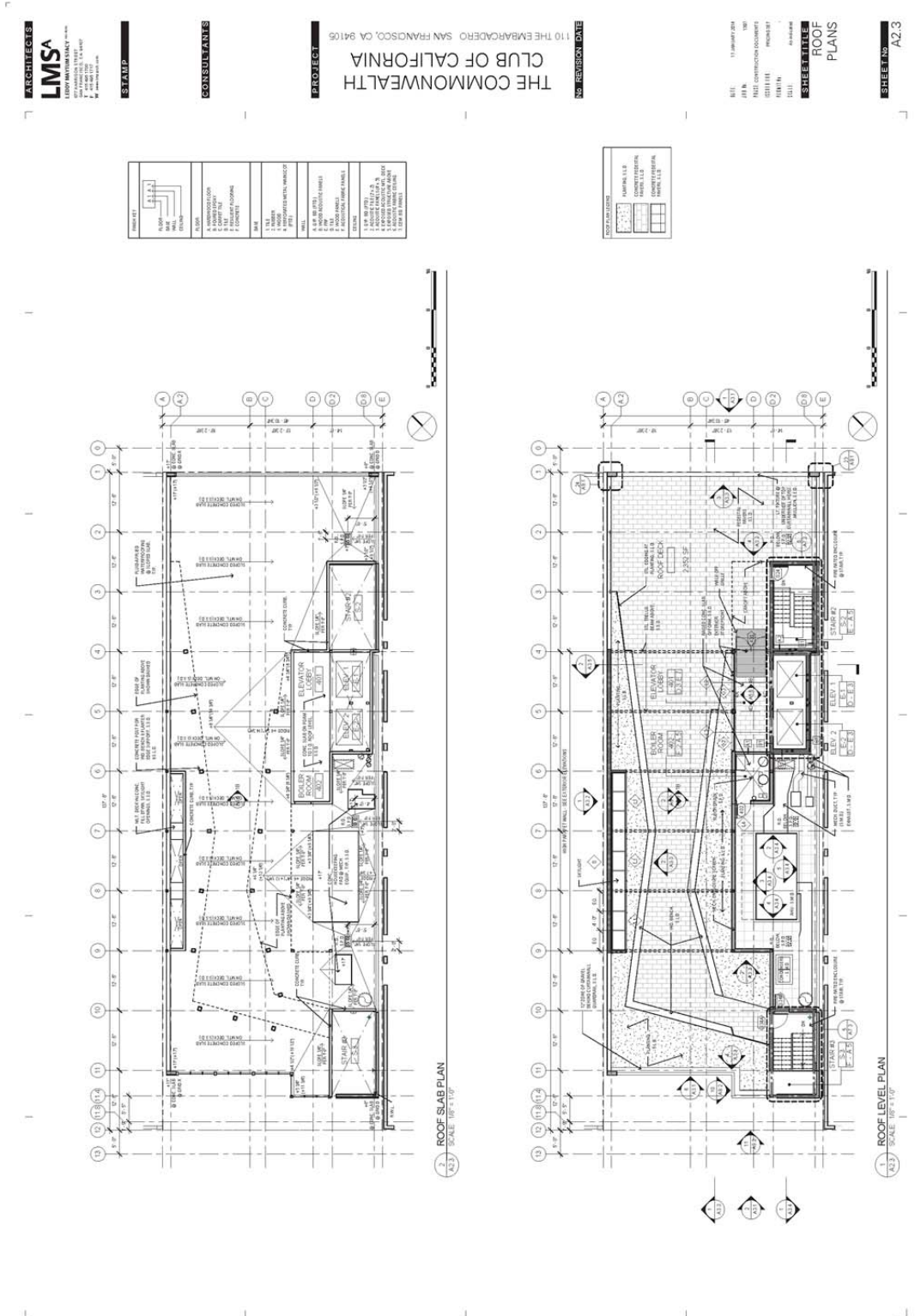


Figure 5: Proposed Elevations

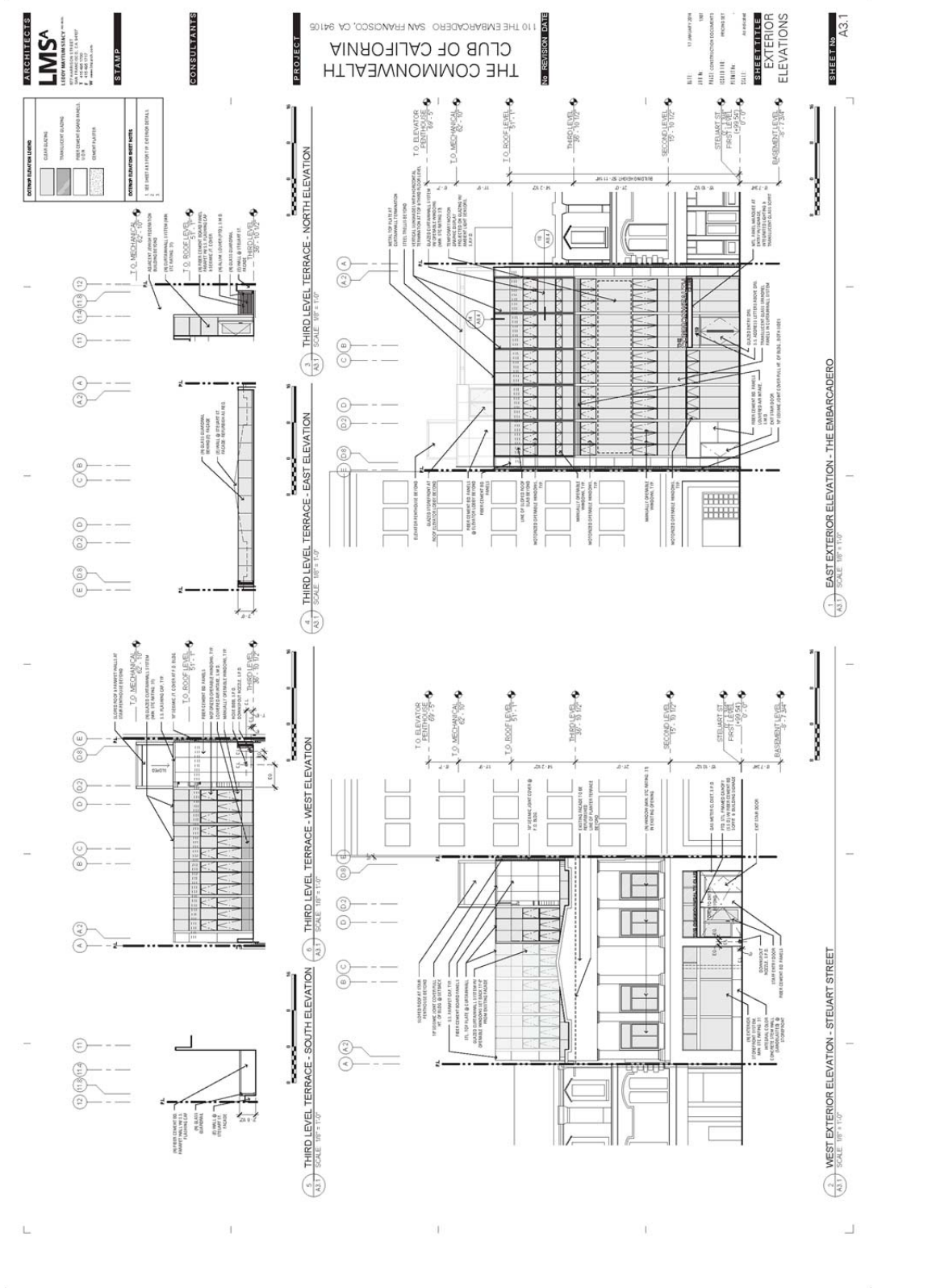


Figure 6a: Proposed Stuart Street Façade



Figure 6b: Proposed The Embarcadero Façade



B. PROJECT SETTING

The project site is located along The Embarcadero, the primary transportation corridor along San Francisco's bay frontage, at the eastern edge of the Financial District. This segment of The Embarcadero is characterized by expansive plazas, a wide boulevard configuration, median-running streetcar tracks, and waterfront-oriented pedestrian spaces. The project site is approximately one block (600 feet) south of Market Street, Justin Herman Plaza and the plazas surrounding the Ferry Building. Other adjacent land uses include office, residential, and hotel buildings, most of which have ground floor retail and service spaces. The site is within 2 ½ blocks (1,400 feet) of several major regional transit hubs, including the Embarcadero Bay Area Rapid Transit (BART)/San Francisco Municipal Railway (Muni) station, the Ferry Building, and the Temporary Transbay Terminal. The terrain of the area is largely level, due to its location on artificial fill.

The project site is within the C-3-O (Downtown – Office) Use District and an 84-X Height and Bulk District, which contains high-density office development centered around a concentration of local and regional transit services. Retail and service uses that support office development are also included. The surrounding blocks on the west side of The Embarcadero are also in the C-3-O Use District, with Height and Bulk Districts ranging from 65-X to 200-S. The public plazas mentioned above are zoned as P (Public) Use Districts, consistent with their use as public open spaces. To the east of the Embarcadero, across the street from the project site, most of the parcels are in a C-2 (Community Business) Use District. Much of the C-3-O Use District is characterized by high-rise office buildings, but those around the project site are mostly mid-rise in scale. On the subject block, none of the buildings are taller than eight stories, given the 84-foot height district. This height is typical of the adjacent blocks along The Embarcadero, though blocks on the west side of Steuart Street contain high-rise buildings. Nearby street-fronting businesses include restaurants, hotels, and other office and tourist-serving establishments. Residential developments are also present along The Embarcadero on blocks to the north and south of the project site.

The project site is next to the Audiffred Building, located on the south side of Mission Street between Steuart Street and The Embarcadero, which directly adjoins the northern wall of the existing project site building. The Audiffred Building was built in 1889, survived the 1906 earthquake and fire, and is designated as a historic landmark (San Francisco Landmark #7). Like the existing building at 110 The Embarcadero, it also played a central role in the 1934 Longshoreman's Strike. Other nearby historic resources

include the Rincon Annex United States Post Office (180 Steuart Street), the YMCA Building (169 Steuart Street), and the Agriculture Building (101 The Embarcadero).³

C. COMPATIBILITY WITH EXISTING 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 type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" type="checkbox"/>

San Francisco Planning Code

The *San Francisco Planning Code* (Planning Code), which incorporates the City’s Zoning Maps, governs permitted uses, densities, and configuration of buildings within San Francisco. Permits to construct new buildings, or to alter or 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) amendments to the *Planning Code* are included as part of the proposed project.

Use

The project site is located in a C-3-O (Downtown – Office) Use District. This district covers much of the Financial District, including the blocks to the west of the project site. The Planning Code describes the C-3-O Use District as: “...playing a leading national role in finance, corporate headquarters and service industries, and serving as an employment center for the region, consists primarily of high-quality office development. The intensity of building development is the greatest in the City, resulting in a notable skyline symbolizing the area’s strength and vitality. The district is served by City and regional transit reaching its central portions and by automobile parking at peripheral locations. Intensity and compactness permit face-to-face business contacts to be made conveniently by travel on foot. Office development is supported by some related retail and service uses within the area, with inappropriate uses excluded in order to conserve the supply of land in the core and its expansion areas for further development of major office buildings.” The proposed project, consisting of office and assembly uses, would

³ Page & Turnbull, *110 The Embarcadero/113-115 Steuart Street Historic Resource Evaluation, Part II*, November 26, 2013. This report is available for review at 1650 Mission Street, 4th Floor, as part of Case No. 2011.1388E.

be principally permitted within the C-3-O Use District and consistent with applicable zoning plans and policies.

Height and Bulk

The project site is located in an 84-X Height and Bulk District. The proposed project would add an additional story to the existing 35-foot-tall building, raising the height to 51'-1" (62'-10" including parapets, rooftop access, and mechanical equipment, which are excluded from building height calculations for planning purposes). The proposed building height would be less than 84 feet, and therefore compliant with the applicable Height and Bulk District limits.

Permit Review

The proposed project is located in a C-3-O Use District and would require a Planning Code Section 309 review. This section establishes a framework for review of projects within all types of C-3 districts to ensure conformity with the Planning Code and the San Francisco General Plan (General Plan).

Plans and Policies

San Francisco General Plan

The General Plan, which provides general policies and objectives to guide land use decisions, contains some policies that relate to physical environmental issues. The General Plan contains 10 elements (Commerce and Industry, Recreation and Open Space, Housing, Community Facilities, Urban Design, Environmental Protection, Transportation, Air Quality, Community Safety, and Arts) that set forth goals, policies, and objectives for the physical development of the City. The proposed project is located in the Northeastern Waterfront Plan Area, which encourages future commercial, office, neighborhood-oriented retail and service, and community and cultural facility uses in the area. No conflicts between the proposed project and policies that relate to physical environmental issues would occur, as discussed in Section E, Evaluation of Environmental Effects. The compatibility of the proposed project with General Plan policies that do not relate to physical environmental issues would be considered by decision-makers as part of their decision whether to approve or disapprove the proposed project, and any potential conflicts identified as part of that process would not alter the physical environmental effects of the proposed project.

Proposition M – 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, and the topics of the Evaluation of Environmental Effects addressing the environmental issues associated with the policies, are: (1) preservation and enhancement of neighborhood-serving retail uses; (2) protection of neighborhood character (Question 1c, Land Use); (3) preservation and enhancement of affordable housing (Question 3b, Population and Housing, with regard to housing supply and displacement issues); (4) discouragement of commuter automobiles (Questions 5a, b, f, and g, Transportation and Circulation); (5) protection of industrial and service land uses from commercial office development and enhancement of resident employment and business ownership (Question 1c, Land Use); (6) maximization of earthquake preparedness (Questions 13 a-d, Geology, Soils, and Seismicity); (7) landmark and historic building preservation (Question 4a, Cultural Resources); and (8) protection of open space (Questions 8a and b, Wind and Shadow, and Questions 9a and c, Recreation).

Prior to issuing a permit for any project that requires an Initial Study under the California Environmental Quality Act (CEQA), and prior to issuing a permit for any demolition, conversion, or change of use, and prior to taking any action that requires a finding of consistency 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 compatibility of the proposed project with the General Plan objectives and policies that do not relate to physical environmental issues will be considered by decision-makers as part of their decision whether to approve or disapprove the proposed project. Any potential conflicts identified as part of the process would not alter the physical environmental effects of the proposed project.

Regional Plans and Policies

The five principal regional planning agencies and their over-arching policy-plans to guide planning in the nine-county Bay Area include the Association for Bay Area Governments (ABAG) and Metropolitan Transportation Commission's *Plan Bay Area Jobs-Housing Connection Strategy*, the Bay Area Air Quality Management District's (BAAQMD) *Bay Area Clean Air Plan*, the San Francisco Regional Water Quality Control Board's *San Francisco Basin Plan*, and the San Francisco Bay Conservation and Development Commission's *San Francisco Bay Plan*. Due to the size, nature, and location of the proposed project, no anticipated environmental conflicts with regional plans would occur.

D. SUMMARY OF ENVIRONMENTAL EFFECTS

The proposed project could potentially affect the environmental factor(s) checked below. The following pages present a more detailed checklist and discussion of each environmental factor.

- | | | |
|---|--|--|
| <input type="checkbox"/> Land Use | <input checked="" type="checkbox"/> Air Quality | <input type="checkbox"/> Biological Resources |
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Greenhouse Gas Emissions | <input type="checkbox"/> Geology and Soils |
| <input type="checkbox"/> Population and Housing | <input type="checkbox"/> Wind and Shadow | <input type="checkbox"/> Hydrology and Water Quality |
| <input checked="" type="checkbox"/> Cultural and Paleo. Resources | <input type="checkbox"/> Recreation | <input type="checkbox"/> Hazards/Hazardous Materials |
| <input type="checkbox"/> Transportation and Circulation | <input type="checkbox"/> Utilities and Service Systems | <input type="checkbox"/> Mineral/Energy Resources |
| <input type="checkbox"/> Noise | <input type="checkbox"/> Public Services | <input type="checkbox"/> Agricultural and Forest Resources |
| | | <input checked="" type="checkbox"/> Mandatory Findings of Significance |

This Initial Study examines the proposed project to identify potential effects on the environment. For each item on the Initial Study checklist, the evaluation has considered the impacts of the proposed project both individually and cumulatively. All items on the Initial Study Checklist that have been checked "Less than Significant Impact with Mitigation Incorporated," "Less than Significant Impact," "No Impact" or "Not Applicable," indicate that, upon evaluation, staff has determined that the proposed project could not have a significant adverse environmental effect relating to that issue. A discussion is included for those issues checked "Less than Significant Impact with Mitigation Incorporated" and "Less than Significant Impact" and for most items checked with "No Impact" or "Not Applicable." For all of the items checked "No Impact" or "Not Applicable" without discussion, the conclusions regarding potential significant adverse environmental effects are based upon field observation, staff experience and expertise on similar projects, and/or standard reference material available within the Department, such as the Department's *Transportation Impact Analysis Guidelines for Environmental Review*, or the California Natural Diversity Data Base and maps, published by the California Department of Fish and Game. For each checklist item, the evaluation has considered the impacts of the proposed project both individually and cumulatively.

The items checked above have been determined to be “Less than Significant with Mitigation Incorporated.”

E. EVALUATION OF ENVIRONMENTAL EFFECTS

<u>Topics:</u>	<u>Potentially Significant Impact</u>	<u>Less Than Significant with Mitigation Incorporated</u>	<u>Less Than Significant Impact</u>	<u>No Impact</u>	<u>Not Applicable</u>
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"/>
c) Have a substantial impact upon the existing character of the vicinity?	<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)

The proposed project would rehabilitate the existing vacant building on the project site, and restore its office and assembly uses. The project includes addition of a new third story to the building, resulting in a net square footage gain of 4,445 sf. Additional building area would be added entirely within the existing boundaries of the lot and within the footprint of the existing building. The project would not interfere with or change the existing street plan nor impede the passage of persons or vehicles. Therefore, the proposed project would not physically divide an established community, and this impact would be less than significant.

Impact LU-2: The proposed project would be consistent with applicable land use plans, policies, and regulations of agencies with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect. (Less than Significant)

The proposed project would not substantially conflict with any applicable land use plan, policy, or regulation such that an adverse physical change would result (see Section C, Compatibility with Existing Zoning and Plans). Environmental plans and policies are those, like the BAAQMD 2010 Clean Air Plan, which directly address environmental issues and/or contain targets or standards, which must be met in order to preserve or improve characteristics of the City’s physical environment. Furthermore, the proposed

project would not conflict with the General Plan policies that relate to physical environmental issues. Therefore, this impact would be less than significant.

Impact LU-3: The proposed project would not have a significant impact upon the existing character of the project's vicinity. (Less than Significant)

The project site is currently developed with an existing vacant building, which previously contained office, assembly, and retail uses. The proposed project would rehabilitate the existing building, restore its former office and assembly uses, and add a new third floor. The existing building is the shortest building on the block, and the additional height would make the building similar in scale to the surrounding buildings on the same block, which range from three to eight stories. The proposed project's combined office and assembly use would not be out of character with that of the existing building or the office buildings typically found in the vicinity. The proposed project would restore active use of the vacant building and make it more consistent with the development intensity and compactness that characterizes the Financial District. Therefore, the impact of the proposed project on the existing character of project's vicinity would be less than significant.

Impact C-LU-1: The proposed project, in combination with past, present, and reasonably foreseeable future projects in the vicinity of the site, would not have a substantial adverse cumulative impact to land use. (Less than Significant)

Few other land use projects are planned or ongoing within a two block vicinity of the project site. The most notable proposed project would be located at 75 Howard Street, which consists of demolishing an existing eight-story parking structure (550 spaces) and constructing a 186-unit, 31-story residential building with a below-grade garage. The new garage would include residential parking and 100 additional parking spaces to serve surrounding commercial land uses that rely on the existing garage. The project would result in a noticeable physical change to the surrounding area, and would increase the number of people present. Given the nature of the proposed nearby project, there is no reason to expect that it would have land use impacts that could combine with the impacts of the proposed project at 110 The Embarcadero/115 Steuart Street. Further, even if these projects did have land use impacts, the proposed project would not contribute in a cumulatively considerable way to physical division of an established community; conflict with land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect; or change the existing neighborhood character. For these reasons, the proposed project, in combination with other past, present, and reasonably foreseeable future projects, would not result in a cumulatively considerable land use impact.

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

A visual quality/aesthetics analysis is somewhat subjective and considers the project in relation to the surrounding visual character, heights and building types of surrounding uses, its potential to obstruct scenic views or vistas, and its potential for light and glare. The proposed project's specific building design would be considered to have a significant adverse environmental effect on visual quality only if it would cause a substantial and demonstrative negative change.

Setting

The Northeast Waterfront Plan, part of the General Plan, identifies public views of the bay from adjacent open spaces, plazas, and grade level along certain streets (including Stuart Street) as an urban design resource. The Urban Design Element of the General Plan also establishes a policy to "recognize and protect major views in the city, with particular attention to those of open space and water" and identifies the bay as a focus of major views. The Urban Design Element also calls for preservation of views from streets and other public areas where they include water and open spaces.

The project site is located on The Embarcadero, which runs along the San Francisco Bay waterfront. The proposed project would increase the existing building's height from 35 feet to 51'-1" (62'-10" including parapets, rooftop access, and mechanical equipment, which are excluded from building height calculations for planning purposes). The existing building at the project site and the proposed addition would be visible from public open spaces and streets nearby, including, the Ferry Plaza, The Embarcadero, and Stuart Street. Buildings in the area consist of a mix of contemporary and historic styles.

Impact AE-1: The proposed project would not have a substantial adverse effect on scenic vistas. (Less than Significant)

A project would have a significant effect on scenic vistas if it would substantially degrade important public view corridors and obstruct scenic views from public areas viewable by a substantial number of people. View corridors are defined by physical elements such as buildings and structures that direct lines of sight and control view directions available to the public. As noted above, The Northeast Waterfront Plan and the Urban Design Element of the General Plan identify the bay as a focus of major views, particularly from open spaces and streets such as Justin Herman Plaza, the Ferry Plaza, The Embarcadero, Steuart Street, and San Francisco Bay. Although the existing building is visible from some of these public spaces, the proposed vertical addition of a third story and roof deck would not intersect lines of sight between these public spaces and San Francisco Bay and would not affect existing view corridors. The proposed addition would not exceed the scale of other buildings on the subject block, which range in height from three to eight stories. These new features and changes would be noticeable, but would not substantially alter scenic vistas or degrade or obstruct any publicly accessible scenic views. Although the project site directly adjoins the historic Audiffred Building, the proposed building addition would not be out of scale with and would not degrade the Audiffred Building's visual setting.

Project construction would occur over 14 months, and would be phased as follows: partial demolition and salvage; shoring and excavation; structural and building shell; and interior build-out. Although construction activities would diminish the existing visual character of the project site, these activities would be limited in duration. Therefore, the proposed project's construction would not have a significant impact on the existing visual character or quality of the site or its surroundings.

Although some reduced private views would be an unavoidable consequence of the proposed project, any change in views would not exceed that commonly accepted in an urban setting. Changes to private views would differ based on proximity to the project site, quality of the view currently experienced, and relative sensitivity of the viewer. Therefore, the proposed project's impact on scenic vistas would be less than significant. Although some reduced private views would be an unavoidable consequence of the proposed project, any change in private views would not exceed that commonly accepted in an urban setting. While this loss or change of views might be of concern to those property owners or tenants, it would not affect a substantial number of people and would not rise to a level considered to be a significant impact on the environment.

The proposed project would not substantially impact any existing public views or view corridors in the area, and the adverse effect upon private views would not be considered a significant impact on the environment, pursuant to CEQA.

Impact AE-2: The proposed project would not substantially damage any scenic resources which contribute to a scenic public setting. (Less than Significant)

Scenic resources are the visible physical features on a landscape (e.g. land, water, vegetation, animals, structures, or other features) which contribute to a scenic public setting. There are no trees or vegetation on the site. The two street trees in front of the building along The Embarcadero would be maintained, and the four street trees along the Steuart Street sidewalk would be removed and replaced with new trees following construction, pursuant to DPW review and approval. Therefore, the proposed project's impact on scenic resources would be less than significant.

Impact AE-3: The proposed project would result in a change to the existing visual character of the project site, but this change would not substantially degrade the visual character or quality of the site and its surroundings. (Less than Significant)

A project would have a significant adverse effect on visual quality under CEQA only if it would cause a substantial and demonstrable negative change to the project site or its surroundings. The existing visual character of the project site and vicinity is that of a heavily-travelled downtown corridor adjacent to open space plazas and waterfront-oriented land uses. Surrounding buildings are characterized by a variety of heights, time periods, and styles. The proposed project would add a third story to the existing building on the project site. The new addition would be set back from the western edge of the building, so as to retain the existing character of the Steuart Street façade. The Embarcadero façade would be replaced with a glass curtain wall that includes a motion graphic display which can be projected onto the glazing. Roof deck features would include a steel and wood trellis, an elevator and stair penthouse clad in fiber concrete panels, and other landscaped planters. These changes would be noticeable, but would not substantially alter the existing visual character of the site or its surroundings in a demonstrably adverse manner. The addition would not exceed the scale of other buildings on the subject block, which range in height from three to eight stories. The project site directly adjoins the historic Audiffred Building, but would not substantially alter its existing visual setting, which consists of a mix of contemporary and historic buildings. For the above reasons, this impact would be less than significant.

Project construction would occur over 14 months, and would be phased as follows: partial demolition and salvage; shoring and excavation; structural and building shell; and interior build-out. Although construction activities would diminish the existing visual character of the project site, these activities would be limited in duration. Therefore, the proposed project's construction would not result in a substantial degradation of the existing visual character or quality of the site or its surroundings.

Impact AE-4: The proposed project would create a new source of light and glare, but not to an extent that would adversely affect daytime or nighttime views in the area or which would substantially affect other people or properties. (Less than Significant)

The proposed project would comply with Planning Commission Resolution 9212 (1981) that establishes guidelines aimed at limiting glare from buildings. The proposed project would rehabilitate and expand the existing building at the project site, change the building's use from vacant space to a mix of office and assembly use, and add a glass curtain wall with motion graphic display projection capabilities. The inclusion of the display on the curtain wall would not add any additional glare. As such, the proposed project would result in minimal sources of light and glare beyond what currently exists (illumination from existing street lights and surrounding buildings). Because the proposed project would comply with Planning Commission Resolution 9212 and would minimally increase the amount of lighting on the project site, it would not have a substantial, negative impact. Based on the above analysis, impacts associated with light and glare would be less than significant.

Impact C-AE-1: The proposed project, in combination with past, present, and reasonably foreseeable future projects in the vicinity, would not have a substantial adverse cumulative impact to aesthetics. (Less than Significant)

Implementation of the proposed project, in combination with the cumulative projects described above in Section E.1 Land Use and Land Use Planning, would result in minimal change to the visual character of the project site vicinity and respective project site. The one notable cumulative project in the vicinity is the replacement of an eight-story parking structure with a 31-story mixed-use residential and commercial building at 75 Howard Street, which would be visually consistent with the surrounding dense urban setting. The project would also be required to comply with City regulations regarding light and glare. Therefore, the proposed project would not have a substantial adverse cumulative effect on a scenic vista, scenic resource, or existing visual character or quality of the site and its surroundings. For these reasons, the proposed project, in combination with other past, present, and reasonably foreseeable future projects, would not result in a cumulatively considerable aesthetics impact.

<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>
3. POPULATION AND HOUSING—					
Would the project:					
a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input 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>
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 induce substantial population growth in San Francisco, either directly or indirectly. (Less than Significant)

The proposed rehabilitation and expansion of the existing building on the project site, and addition of assembly uses would not be expected to trigger substantial demand for new residential units. The proposed project would not include new housing units or new businesses. The Commonwealth Club of California would relocate its offices and assembly events from its current location in the Financial District (595 Market Street) to the project site. As such, many of the jobs would be relocating to the site from within San Francisco. The total number of full-time employees on the project site would be approximately 38, plus 10 to 15 part-time seasonal interns (average of 45 employees each day). The project would not generate a substantial number of new jobs or demand for additional housing in the context of citywide employment growth.

While the proposed project would increase employment at the project site compared to existing conditions, project-specific impacts would not be significant relative to the number of area-wide residents and employees in the project’s Financial District setting. Overall, the increase in employment would be less than significant in the context of the expected increases in the population of San Francisco. The proposed project would not directly or indirectly induce substantial population growth in San Francisco, thus this impact would be less than significant.

Impact PH-2: The proposed project would not displace existing housing units, or substantial numbers of people, or create demand for additional housing, necessitating the construction of replacement housing. (Less than Significant)

The proposed project would not displace any housing, as there are no residential dwelling units on the project site. The proposed office and assembly use of the building would result in a minimal increase in employees. The proposed construction would result in a temporary additional demand for construction workers. Neither of these employment increases would generate a substantial demand for additional housing. The proposed project would not displace existing housing units or create substantial housing demand. Therefore, this impact would be less than significant.

Impact C-PH-1: The proposed project, in combination with past, present, and reasonably foreseeable future projects in the vicinity, would not result in significant cumulative impacts to population and housing. (Less than Significant)

The proposed project would not result in substantial growth or displace any residences. The project, in combination with other projects such as the one at 75 Howard Street discussed above in Section E.1 Land Use and Land Use Planning, would not have a significant impact on population or housing demand. The proposed project, in combination with other past, present, and reasonably foreseeable future projects, would not result in a cumulatively considerable population and housing impact.

<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. CULTURAL AND PALEONTOLOGICAL RESOURCES—Would the project:					
a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5, including those resources listed in Article 10 or Article 11 of the San Francisco Planning Code?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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) 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"/>
d) 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"/>

Impact CP-1: The proposed project would not result in a substantial change in the significance of an individually eligible historic resource. (Less than Significant)

Under CEQA, a property qualifies as a historic resource if it is listed in, or determined to be eligible for listing in, the California Register of Historical Resources, or if it is considered a contributor to a potential historic district. The Historic Resource Evaluation Response prepared by the Planning Department’s preservation staff⁴ evaluated the proposed project’s consistency with the *Secretary of the Interior’s Standards for Rehabilitation* (Secretary’s Standards) and is summarized as follows.

⁴ San Francisco Planning Department, *Historic Resource Evaluation Response, 110 Embarcadero/113-115 Steuart Street*, Case No. 2011.1388E December 13, 2013. This report is available for review at 1650 Mission Street, 4th Floor, as part of Case No. 2011.1388E.

To be eligible for the California Register of Historic Resources under Criterion 1 (events), the building cannot merely be associated with historic events or trends but must have a specific association to be considered significant. The San Francisco chapter of the International Longshoremen's Association (ILA) was headquartered at the subject property at 113 Steuart Street from 1932 to 1934. The second floor of the subject building contained the union hall of the ILA, which was accessed via an entrance from Steuart Street. During the 1934 Longshoremen's Strike, two men were shot on the street outside the ILA union hall entrance on "Bloody Thursday" and their bodies were laid in state at the union hall after the event. Several days after the event, a public funeral procession started at the subject property before travelling down Market Street. The union hall served as an important gathering place for the sailors before, during, and after the strike and shootings. The ILA Strike in San Francisco set off similar strikes elsewhere, which shut down all Pacific Coast ports and was a significant event in West Coast labor history. As the subject property is directly associated with the ILA, Bloody Thursday, the 1934 Longshoremen's Strike and related events, it is considered eligible for listing in the California Register under Criterion 1.

The original owner of the subject building is unknown. Subsequent owners and occupants include a variety of commercial tenants serving the waterfront uses and none appear to have made a significant contribution to local, state or national history. Therefore, the 110 Embarcadero/115 Steuart Street building is not considered eligible for listing in the California Register under Criterion 2 (persons).

The subject building is a typical reconstruction-era commercial building that was built in the aftermath of the 1906 earthquake and fire. The building is a modest example of the twentieth century commercial style and does not possess distinctive character such that it would qualify under Criterion 3 (architecture). Therefore, 110 Embarcadero/115 Steuart Street is not considered eligible for listing in the California Register under Criterion 3.

Based upon a review of information in the Departments records, the subject property is not significant under Criterion 4 (important in prehistory or history), which is typically associated with archaeological resources. Furthermore, the project site is not likely significant under Criterion 4, since this criterion typically applies to rare construction types when involving the built environment. The subject property is not an example of a rare construction type. Thus, the project site is not eligible for listing in the California Register under Criterion 4.

The project site is not located within the boundaries of any existing historic district or conservation district. It is adjacent to, but not part of, the Port of San Francisco Embarcadero Historic District, which is listed in the National Register of Historic Places. The neighborhood lacks uniform historic character due to numerous alterations to

properties and new construction in the area. While there are several historic resources in the area, they are each individually significant for their representation of distinct periods of the area's history, thus there does not appear to be a potential historic district in the area that could be affected by the project.⁵

To be a resource for the purposes of CEQA, a property must not only be shown to be significant under the California Register of Historical Resources criteria, but it also must retain integrity of location, design, setting, materials, workmanship, feeling, and association. Since its initial construction circa 1910 as a commercial building, many documented and undocumented alterations have occurred to the subject property. Alterations include: insertion of awnings above the second story windows, removal of all original storefront materials on the Embarcadero and Steuart Street façades, window replacement, removal of the pressed metal cornice on the Embarcadero façade and other ornamental features.

Since the period of significance in 1934, the subject property has retained its original location next to the Audiffred Building and across from the waterfront. Although the Financial District has grown up to the west of the project site, the area immediately adjacent to the project site is still relatively low in scale, and many historic buildings remain from the period of significance such that integrity of location, association, setting and feeling are retained. The form, massing, arrangement, and architectural details of the building are consistent with the utilitarian commercial architecture built during San Francisco's post-earthquake reconstruction period in the early twentieth century. The overall massing, scale, window and storefront openings, and parapets remain intact such that integrity of design, materials and feeling are retained. Due to the removal of the commercial storefronts and ornamental character-defining features, the workmanship of the building has been compromised such that integrity of workmanship is no longer retained. Overall, the subject property retains sufficient integrity to convey its significance as an individual resource eligible under California Register Criterion 1.

The character-defining features of the subject property include the overall two-story massing and rectangular plan and the stucco cladding. The character-defining features of the Steuart Street façade include the shaped parapet with coping, the fenestration size and pattern of the four window openings and one blind center window at the second story, and the concrete wall panels above the window openings. The character-defining features of the Embarcadero façade include the flat parapet, the fenestration size and pattern of five window openings at the second story, the concrete wall panels above the window openings at the second story, and the Classical Revival ornament, including six

⁵ Page & Turnbull, *110 The Embarcadero/113-115 Steuart Street Historic Resource Evaluation, Part II*, November 26, 2013. This report is available for review at 1650 Mission Street, 4th Floor, as part of Case No. 2011.1388E.

Tuscan pilasters between windows at the second story, reed molding (belt course) below the second story, the cornice above the second story windows, and the medallions above each pilaster.

Preservation staff concurs with the historic resource evaluation prepared for the proposed project.⁶ The proposed project would comply with the following five of the Secretary's Standards:

3. Each property will be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or elements from other historic properties, will not be undertaken.
4. Changes to a property that have acquired historic significance in their own right will be retained and preserved.
6. Deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature will match the old in design, color, texture, and, where possible, materials. Replacement of missing features will be substantiated by documentary and physical evidence.
7. Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.
8. Archeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.

The proposed project would not comply with the following five Secretary's Standards:

1. A property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces, and spatial relationships.
2. The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces, and spatial relationships that characterize a property will be avoided.
5. Distinctive materials, features, finishes, and construction techniques or examples of craftsmanship that characterize a property will be preserved.
9. New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work shall be differentiated from the old and will be compatible with the

⁶ Page & Turnbull, *Historic Resource Evaluation – Part II, 110 The Embarcadero/113-115 Steuart Street*, November 26, 2013. This report is available for review at 1650 Mission Street, 4th Floor, as part of Case No. 2011.1388E. pp. 23-27.

historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment.

10. New additions and adjacent or related new construction will be undertaken in such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

The proposed project would meet half of the Secretary's Standards and therefore would not comply with the Standards overall. However, the proposed project would not materially impair the significance of the individual historic resource under California Register Criterion 1, and would not cause a significant adverse impact to historic architectural resources because:

- The proposed project would include retention of the character-defining features of the Steuart Street façade
- The proposed third story addition to the building would be set back from the Steuart Street façade by 6'-8" at the south side of the building and 11'-6" at the north side of the building
- The proposed project would include a plaque on the exterior of the Steuart Street façade, central to the façade near the building entrance, dedicated to the labor history that occurred along Steuart Street in 1934, and
- In the building, the Commonwealth Club would specifically curate historic archival materials related to the labor events in 1934, including the building's association with the 1934 Longshoreman's Strike, with the objective of educating the public about the property's historic themes, associations, and lost character-defining features within broader historical, social, and physical landscape contexts.

The proposed project would include removal of all character-defining features of the Embarcadero façade, but since the significance of the property under Criterion 1 is most closely tied to the Steuart Street façade, the building would continue to convey its significance under Criterion 1. For the above reasons, this impact would be less than significant.

Impact CP-2: The proposed project would not cause a substantial adverse change in the significance of an archeological resource. (Less than Significant with Mitigation)

Based on the Preliminary Archeological Review performed by Planning Department archeology staff, the project site has been determined to be sensitive for historic-period archeological resources associated with the mid- to late 19th century development of the

waterfront, specifically piers and associated structures.⁷ The proposed project would retain and repurpose the existing building including a vertical addition, insertion of elevators, and a structural upgrade. The proposed project does not involve subgrade levels below the existing single-level basement. Excavation for the elevator pit would extend below the basement floor for approximately 6.6 feet to approximately 15 feet below ground level. Some additional excavation would be needed for structural upgrades, but would be less deep than the elevator pit. Excavation for utility work may also be necessary. Based on the geotechnical report and subsequent update letters⁸, drilled piers or a similar deep foundation system are not required. Excavation for the elevator pit and other project excavation beneath the existing basement have the potential to impact significant archeological resources. Archeological Mitigation Measure M-CP-2 below, to which the project sponsor has agreed, would reduce this potential impact to less than significant.

Mitigation Measure M-CP-2: Archeological Monitoring Program

Based on the reasonable potential that archeological resources may be present within the project site, the following measures shall be undertaken to avoid any potentially significant adverse effect from the proposed project on buried or submerged historical resources. The project sponsor shall retain the services of an archaeological consultant from the rotational Department Qualified Archaeological Consultants List (QACL) maintained by the Planning Department archaeologist. The project sponsor shall contact the Department archaeologist to obtain the names and contact information for the next three archeological consultants on the QACL. The archeological consultant shall undertake an archeological monitoring program. All plans and reports prepared by the consultant as specified herein shall be submitted first and directly to the ERO for review and comment, and shall be considered draft reports subject to revision until final approval by the ERO. Archeological monitoring and/or data recovery programs required by this measure could suspend construction of the project for up to a maximum of four weeks. At the direction of the ERO, the suspension of *construction* can be extended beyond four weeks only if such a suspension is the only feasible means to reduce to a less than significant level potential effects on a significant archeological resource as defined in CEQA Guidelines Sect. 15064.5 (a)(c).

⁷ San Francisco Planning Department, "Preliminary Archeological Review," February 21, 2008; and "Preliminary Archeological Review," May 22, 2014. These documents are available for review at 1650 Mission Street, 4th Floor, as part of Case No. 2011.1388E.

⁸ Treadwell & Rollo, "Geotechnical Investigation and Site Specific Response Spectra, 110 The Embarcadero (113-115 Steuart Street), San Francisco, CA," February 6, 2008; "Geotechnical Review of Structural Documents, Proposed Renovation, 110 The Embarcadero, San Francisco, California," December 17, 2013; and "Clarification – Geotechnical Review Letter dated 17 December 2013," May 19, 2014. These documents are available for review at 1650 Mission Street, 4th Floor, as part of Case No. 2011.1388E.

Consultation with Descendant Communities: On discovery of an archeological site⁹ associated with descendant Native Americans or the Overseas Chinese an appropriate representative¹⁰ of the descendant group and the ERO shall be contacted. The representative of the descendant group shall be given the opportunity to monitor archeological field investigations of the site and to consult with ERO regarding appropriate archeological treatment of the site, of recovered data from the site, and, if applicable, any interpretative treatment of the associated archeological site. A copy of the Final Archaeological Resources Report shall be provided to the representative of the descendant group.

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

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

⁹ By the term “archeological site” is intended here to minimally include any archeological deposit, feature, burial, or evidence of burial.

¹⁰ An “appropriate representative” of the descendant group is here defined to mean, in the case of Native Americans, any individual listed in the current Native American Contact List for the City and County of San Francisco maintained by the California Native American Heritage Commission and in the case of the Overseas Chinese, the Chinese Historical Society of America.

If in the case of pile driving activity (foundation, shoring, etc.), the archeological monitor has cause to believe that the pile driving activity may affect an archeological resource, the pile driving activity shall be terminated until an appropriate evaluation of the resource has been made in consultation with the ERO. The archeological consultant shall immediately notify the ERO of the encountered archeological deposit. The archeological consultant shall, after making a reasonable effort to assess the identity, integrity, and significance of the encountered archeological deposit, present the findings of this assessment to the ERO.

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

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

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

The scope of the ADRP shall include the following elements:

- *Field Methods and Procedures.* Descriptions of proposed field strategies, procedures, and operations.
- *Cataloguing and Laboratory Analysis.* Description of selected cataloguing system and artifact analysis procedures.

- *Discard and Deaccession Policy.* Description of and rationale for field and post-field discard and deaccession policies.
- *Interpretive Program.* Consideration of an on-site/off-site public interpretive program during the course of the archeological data recovery program.
- *Security Measures.* Recommended security measures to protect the archeological resource from vandalism, looting, and non-intentionally damaging activities.
- *Final Report.* Description of proposed report format and distribution of results.
- *Curation.* Description of the procedures and recommendations for the curation of any recovered data having potential research value, identification of appropriate curation facilities, and a summary of the accession policies of the curation facilities.

Human Remains, Associated or Unassociated Funerary Objects. The treatment of human remains and of associated or unassociated funerary objects discovered during any soils disturbing activity shall comply with applicable State and Federal Laws, including immediate notification of the Coroner of the City and County of San Francisco and in the event of the Coroner's determination that the human remains are Native American remains, notification of the California State Native American Heritage Commission (NAHC) who shall appoint a Most Likely Descendant (MLD) (Pub. Res. Code Sec. 5097.98). The archeological consultant, project sponsor, ERO, and MLD shall make all reasonable efforts to develop an agreement for the treatment of, with appropriate dignity, human remains and associated or unassociated funerary objects (CEQA Guidelines. Sec. 15064.5(d)). The agreement should take into consideration the appropriate excavation, removal, recordation, analysis, curation, possession, and final disposition of the human remains and associated or unassociated funerary objects.

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

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

may require a different final report content, format, and distribution than that presented above.

With implementation of this mitigation measure, the proposed project's impacts on archeological resources would be less than significant.

Impact CP-3: The proposed project would not directly or indirectly destroy a unique paleontological resource or site or unique geologic feature. (Less than Significant)

Paleontological resources, or fossils, are the remains, imprints, or traces of once-living organisms preserved in rocks and sediments. Paleontological resources include vertebrate, invertebrate, and plant fossils or the trace or imprint of such fossils. The fossil record is the only evidence that life on earth has existed for more than 3.6 billion years. Fossils are considered nonrenewable resources because the organisms from which they derive no longer exist. Thus, once destroyed, a fossil can never 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 and volcanic formations.

Excavation work resulting from the proposed project would not be expected to adversely affect paleontological resources. Subsurface construction for the proposed project would include shear walls and a new elevator pit up to five feet below the existing basement level (up to approximately 15 feet below existing grade). The soils underlying the project site consist of artificial fill, and the proposed project excavation would not be expected to affect soils at a depth greater than 15 feet below grade. As such, the proposed project would not be expected to affect geologic units that might contain paleontological remains or traces of paleontological remains. Therefore, the proposed project's impact on paleontological resources would be less than significant.

Impact CP-4: The proposed project would not disturb any human remains, including those interred outside of formal cemeteries. (Less than Significant with Mitigation)

Impacts on Native American burials are considered under Public Resources Code (PRC) Section 15064.5(d)(1). When an Initial Study identifies the existence of, or the likelihood of, Native American human remains within the project site, the CEQA lead agency is required to work with the appropriate tribal entity, as identified by the NAHC. The CEQA lead agency may develop an agreement with the appropriate tribal entity for testing or disposing of, with appropriate dignity, the human remains and any items associated with Native American burials. By implementing such an agreement, the project becomes exempt from the general prohibition on disinterring, disturbing, or removing human remains from any location other than the dedicated cemetery (Health and Safety Code Section 7050.5) and the requirements of CEQA pertaining to Native

American human remains. The project's treatment of human remains and of associated or unassociated funerary objects discovered during any soils-disturbing activity would comply with applicable state laws, including immediate notification of the City and County of San Francisco Coroner. If the Coroner were to determine that the remains are Native American, the NAHC would be notified and would appoint a Most Likely Descendant (PRC Section 5097.98). Mitigation measure M-CP-2, specified above, also contains language to ensure the sound handling of any encountered human remains. The project site has not been identified as a site with potential Native American burials. As such, the project is not anticipated to disturb any human remains, include Native American burials.

Impact CP-C-1: The proposed project, in combination with past, present, and reasonably foreseeable future projects in the vicinity, would not result in cumulative impacts to cultural resources. (Less than Significant)

As described above, the existing building on the project site was constructed circa 1910, and is considered a historic resource. The project site is not within the boundaries of a designated or potential historic district. It is located adjacent to the historic Audiffred Building (100 The Embarcadero), and near three other historic resources: the Rincon Annex United States Post Office (180 Steuart Street), the YMCA Building (169 Steuart Street), and the Agriculture Building (101 The Embarcadero). None of the active projects in the area are proposing alterations to historic resources. It is not expected that the proposed project in combination with other cumulative projects would have impacts that would contribute in a cumulatively considerable way to any substantial adverse effect on historic resources. Therefore, the proposed project and other cumulative projects would not have a significant impact on a historic district or off-site historic resource.

Project-related impacts on archeological resources, paleontological resources, and human remains are site-specific and generally limited to the proposed project's construction area. 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 on archeological resources, paleontological resources, or human remains.

<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. 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 project site is not located within an airport land use plan area or in the vicinity of a private airstrip. The proposed project would not interfere with air traffic patterns. Therefore, topic 5c is not applicable.

Setting

The project site is located in the Financial District on a through lot fronting The Embarcadero and Steuart Street, just south of Mission Street and is within the block bounded by Mission Street to the north, The Embarcadero to the east, Howard Street to the south, and Steuart Street to the west. In the vicinity of the project site, Mission Street is an east-west roadway, with one eastbound and two westbound travel lanes, parking on both sides, and a single non-revenue streetcar track adjacent to the subject block. The Embarcadero is primarily a north-south roadway, with three travel lanes in each direction, two median-running streetcar tracks, and parking on the west side. Howard Street is primarily a westbound one-way street, but has two travel lanes in each direction along the subject block where the project site is located, and parking on both

sides. Steuart Street is a southbound one-way street with a single travel lane and parking on both sides. Though it is striped as a single-lane street, it is wide enough for vehicles to pass a stopped truck or double-parked vehicle. The parking on the east side of Steuart Street is angled. The speed limit on Mission and Steuart Streets is 25 miles per hour, and the speed limit on Howard Street and The Embarcadero is 30 miles per hour. All intersections surrounding the subject block are signalized. A 14-Mission bus stop is located at the intersection of Mission and Steuart Streets, BART and Muni rail service is available two blocks away at Embarcadero Station, and several other bus lines operate along Market Street. Regional bus service is available nearby at the Temporary Transbay Terminal, located on the block bounded by Mission, Main, Howard, and Beale Streets. Mission and Howard Streets adjacent to the project site contain Class III bikeways, and The Embarcadero has Class II bikeways in both directions.¹¹

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, nor would the proposed project conflict with an applicable congestion management program. (Less than Significant)

Policy 10.4 of the Transportation Element of the General Plan states that the City will “Consider the transportation system performance measurements in all decisions for projects that affect the transportation system.” To determine whether the proposed project would conflict with a transportation- or circulation-related plan, ordinance or policy, this section describes the potential impacts that the proposed project would have on traffic, transit, pedestrian, bicycle, loading, parking, and emergency vehicle circulation, as well as any potential transportation impacts related to construction of the proposed project.

Trip Generation

Trip generation estimates for the proposed project were prepared using the *Transportation Impact Analysis Guidelines for Environmental Review*, October 2002 (*Transportation Guidelines*)¹² and Commonwealth Club survey data.¹³ Office-related trips were calculated using the Transportation Guidelines, and the assembly-related trips were calculated using the survey data. Assembly-related trip estimates used the conservative assumption of simultaneous maximum-capacity events in all of the

¹¹ Bikeways are typically classified as Class I, II, or III bikeways. “Class I bikeways are bicycle paths with exclusive right-of-way for use by bicyclists or pedestrians. Class II bikeways are bicycle lanes striped with the paved areas of roadways, and established for the preferential use of bicycles, while Class III bikeways are signed bicycle routes that allow bicycles to share streets or sidewalks with vehicles or pedestrians.” San Francisco Bicycle Plan FEIR, Volume 1, p. V.A.1-14. This document is one file and available for public review at the Planning Department, as part of Case File 2007.0347E.

¹² This document can be found at: <http://www.sfplanning.org/Modules/ShowDocument.aspx?documentid=6753>.

¹³ Stantec Consulting Services, *110 The Embarcadero Transportation Study Memo*, June 19, 2014. This document is available for review at 1650 Mission Street, 4th Floor, as part of Case No. 2011.1388E.

assembly rooms (435 attendees in total). During regular operation of the proposed project, assembly events would not occur every day, and not all events would reach maximum capacity. Based on the above assumptions, the proposed project would generate approximately 1,110 daily person-trips and approximately 120 daily vehicle-trips. During the PM peak hour, the proposed project would generate approximately 50 vehicle trips, 300 transit trips, and 70 walking trips.¹⁴ According to the survey data, less than one percent of trips would be by taxi.

Traffic

As set forth in the *Transportation Guidelines*, the Planning Department evaluates traffic conditions for the weekday PM peak hour conditions (between the hours of 4 PM to 6 PM), which typically represent the worst conditions for the local transportation network. Although the proposed project is estimated to generate approximately 470 PM peak hour person trips, with approximately 50 PM peak hour vehicle trips, these vehicle trips are not anticipated to substantially change the level of service at the intersections in the project vicinity, and would not be considered a substantial traffic increase relative to the existing capacity of the local street system. The trips associated with the project would be dispersed throughout the local roadway network. The majority of trips would also occur in the inbound direction during the PM peak hour, where there is typically excess capacity available. Therefore, the proposed project's impact on existing vehicular traffic is considered less than significant. Improvement Measure IM-TR-1a below, to which the project sponsor has agreed, would further reduce the less-than-significant traffic impacts.

Improvement Measure IM-TR-1a: Transportation Demand Management Program

The Proposed Project shall provide at least ten (10) secured bicycle storage locations in the basement for the employees to promote other modes of transportation. In addition, the project sponsor shall implement a Transportation Demand Management (TDM) Program for both employees and visitors that seeks to annually reduce the number of single occupancy vehicle (SOV) trips to and from the project site and encourage persons arriving/departing via alternative modes of transportation (e.g., walking, bicycling, transit). The project sponsor shall designate one or more TDM program managers/contacts, and provide training for these positions. Commonwealth Club shall document and make available upon request, biannually (every two years) monitoring reports, starting one year after certificate of occupancy for the building (baseline year), for review by the City, including the Planning Department. The biannual monitoring reports shall include travel demand surveys (i.e., travel demand analysis information

¹⁴ Ibid.

requested in the SF Guidelines¹⁵) of employees and visitors arriving and leaving the building for up to seven days of the reporting period. Generally, the TDM program shall be considered effective if in two consecutive reporting periods that there is a 10 percent reduction¹⁶ in SOV trips to and from the project site from the baseline year. The project sponsor shall consider and include some or all of the following TDM measures:

- Provide ongoing local and regional transportation information (e.g., transit maps and schedules, maps of bicycle routes, internet links) for new and existing employees and patrons, including providing a transportation insert for the invitation packet that would provide information on transit service (Muni and BART lines, schedules and fares), car- and bike-share information, information on where transit passes could be purchased, and information on the 511 Regional Rideshare Program.
- Continue to participate in the Muni FastPass (loaded onto a Clipper card) program as part of the Commonwealth Club employee benefits package.
- Provide information on transportation options, including updates and a “ride board” through which employees and patrons can offer/request rides, on the website and/or lobby bulletin board.
- Encourage the use of bicycles by increasing the number of on-site and potentially on-street bicycle racks making them convenient and easy to use. Provide clear points of access to bicycle parking and storage through elevators and/or on the ground floor, and ensure signage indicates the location of these facilities (if public).
- Consider providing discounted bike share membership passes for employees as part of the Commonwealth Club employee benefits package.
- Promote the nearby bike share stations as part of travel information, providing links to additional information on use and membership.
- Similarly, provide information regarding local car share programs.

Parking

Parking conditions are not static, as parking supply and demand varies from day to day, from day to night, from month to month, etc. Hence, the availability of parking spaces (or lack thereof) is not a permanent physical condition, but changes over time as people change their modes and patterns of travel. While parking conditions change over time, a substantial deficit in parking caused by a project that creates hazardous conditions or significant delays to traffic, transit, bicycles or pedestrians could adversely affect the physical environment. Whether a deficit in parking creates such conditions will depend on the magnitude of the shortfall and the ability of drivers to change travel patterns or

¹⁵ City and County of San Francisco, Transportation Impact Analysis Guidelines for Environmental Review, October 2002, Chapter 3, Section 3.

¹⁶ The 10 percent reduction aligns with the reduction required between 2010 and 2018 for the San Francisco Municipal Transportation Agency to meet their 50 percent private automobile mode share goal outlined in the Strategic Plan, Fiscal year 2013 – Fiscal Year 2018.

switch to other travel modes. If a substantial deficit in parking caused by a project creates hazardous conditions or significant delays in travel, such a condition could also result in secondary physical environmental impacts (e.g., air quality or noise impacts cause by congestion), depending on the project and its setting.

The absence of a ready supply of parking spaces, combined with available alternatives to auto travel (e.g., transit service, taxis, bicycles or travel by foot) and a relatively dense pattern of urban development, induces many drivers to seek and find alternative parking facilities, shift to other modes of travel, or change their overall travel habits. Any such resulting shifts to transit service or other modes (walking and biking), would be in keeping with the City's "Transit First" policy and numerous General Plan Polices, including those in the Transportation Element. The City's Transit First Policy, established in the City's Charter Article 8A, Section 8A.115, provides that "parking policies for areas well served by public transit shall be designed to encourage travel by public transportation and alternative transportation."

The transportation analysis accounts for potential secondary effects, such as cars circling and looking for a parking space in areas of limited parking supply, by assuming that all drivers would attempt to find parking at or near the project site and then seek parking farther away if convenient parking is unavailable. The secondary effects of drivers searching for parking is typically offset by a reduction in vehicle trips due to others who are aware of constrained parking conditions in a given area, and thus choose to reach their destination by other modes (i.e. walking, biking, transit, taxi). If this occurs, any secondary environmental impacts that may result from a shortfall in parking in the vicinity of the proposed project would be minor, and the traffic assignments used in the transportation analysis, as well as in the associated air quality, noise and pedestrian safety analyses, would reasonably address potential secondary effects.

No off-street parking would be provided on the project site, so all of the approximately 120 daily vehicle trips to the project site would represent unmet parking demand. Most people arriving by car would likely use nearby garages, street parking, and valet services. Ten indoor bicycle spaces would be provided for employees in the building's basement. The majority of employees and visitors are anticipated to arrive by transit due to the proposed project's location in the Financial District, which is a hub for regional and local transit service. Additionally, the project site is well served by pedestrian and bicycle facilities. Therefore, the unmet parking demand associated with the project would not materially affect the overall parking conditions in the project vicinity such that hazardous conditions or significant delays are created.

In summary, the proposed project would not result in a substantial parking deficit that would create hazardous conditions or significant delays affecting traffic, transit, bicycles or pedestrians. Therefore, impacts related to parking would be less than significant.

Improvement Measure IM-TR-1a above would further reduce these less-than-significant impacts.

Loading

Under Section 152 of the Planning Code, the proposed project would not be required to provide an off-street loading space. Loading for the building would occur in the four commercial loading spaces directly adjacent to the project site. It is expected that the existing on-street loading spaces would accommodate the loading demand of the proposed project. This amount of demand could be accommodated with street frontage on Steuart Street without creating potentially hazardous conditions or significant delays affecting traffic, transit, bicycles, or pedestrians. Some double parking was observed on Steuart Street near the project site during field work performed as part of the transportation analysis¹⁷. However, traffic volumes on Steuart Street were observed to be light, and the existing one-way configuration allows enough space for motorists to pass double-parked vehicles without creating any substantial congestion or hazards. Therefore, impacts related to loading would be less than significant.

Construction

Construction is expected to last approximately 14 months. Typical construction hours are expected to be between 7:00 am and 6:00 pm Monday through Friday. Work on Saturdays would be evaluated on a case-by-case basis. If typical construction activities need to occur on a Saturday the hours would be between 8:00 am and 4:00 pm. No construction activity is expected to take place on Sundays, recognized holidays or during “off hours” (i.e. any time frame not listed above) unless a specific urgent need arises. On some occasions working outside of the hours above may be required, i.e. to ensure safety, concrete pours that require long durations, etc. Any construction activity proposed to occur outside of the hours above would be evaluated on a case-by-case basis with appropriate approvals being issued before proceeding. As required, the project sponsor and construction contractors would meet with the City’s Transportation Advisory Staff Committee (TASC) to determine feasible methods to reduce traffic congestion, including effects on the transit system and pedestrian circulation impacts during construction of the proposed project. TASC consists of representatives from the Traffic Engineering Division of the Department of Parking and Traffic (DPT), the Fire Department, Muni, and the Planning Department. Given the temporary and intermittent nature of the construction activities, the proposed project’s construction-related activities would not result in a substantial transportation impact. Improvement Measures IM-TR-1b and IM-TR-1c, to which the project sponsor has agreed, would further reduce the less-than-significant impact.

¹⁷ Stantec Consulting Services, *110 The Embarcadero Transportation Study Memo*, June 19, 2014. This document is available for review at 1650 Mission Street, 4th Floor, as part of Case No. 2011.1388E.

Improvement Measure IM-TR-1b: Construction Deliveries

To further minimize the construction-related disruption of the general traffic flow on adjacent streets during the AM and PM peak periods, truck movements and deliveries shall be restricted to off-peak hours (generally outside of 7 AM to 9 AM and 4 PM to 6 PM on weekdays, but restrictions may include other times during Giants game days), or other times, as determined by SFMTA and its Transportation Advisory Staff Committee (TASC).

Improvement Measure IM-TR-1c: Construction Management Plan – Additional Actions

The project sponsor shall be required to develop and implement a Construction Management Plan (CMP), addressing transportation-related circulation, access, staging, and potential lane and sidewalk closures. In addition to these requirements, the project sponsor shall consider implementing the following measures as part of the CMP:

Construction and Transit Access for Construction Workers – to minimize parking demand and vehicle trips associated with construction workers, include methods to encourage carpooling and transit use to the project site by construction workers.

- Project Construction Coordination and Updates for Adjacent Businesses, the Public and Residents: The project sponsor shall be required to consult with surrounding community members, including business and property owners near the project site to assist coordination of construction traffic management strategies as they relate to the needs of those adjacent to the project site. The project sponsor shall develop a public information plan to provide adjacent residents and businesses with regularly-updated information and a construction-management contact person who shall provide information on project construction activities and schedule, peak construction vehicle activities (e.g. concrete pours), travel detours or other lane closures.

Impact TR-2: The proposed project would not substantially increase hazards due to a design feature or incompatible uses. (Less than Significant)

The project site is located on a developed block of San Francisco. The proposed project would result in the addition of a third story to an existing vacant building and rehabilitating it for office and assembly use. There are no project features that would substantially increase traffic-related hazards. In addition, as discussed in Section E.1, the project does not include incompatible land uses. Therefore, transportation hazard impacts due to a design feature or resulting from incompatible uses would be less than significant.

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

Emergency access would remain unchanged from existing conditions. Emergency vehicles would continue to access the site from Steuart Street and The Embarcadero. The proposed project would not inhibit emergency access to the project site. The proposed project would not be expected to affect emergency response times or access to other sites. It would not close off any existing streets or entrances to public uses. Therefore, the project would have a less than significant impact on emergency access to the project site or any other surrounding sites.

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 features. (Less than Significant)

Transit

The proposed project would generate approximately 300 PM peak-hour transit person-trips which would be dispersed among the various Muni, BART, ferry, and regional bus lines within the project vicinity. The trips associated with the project would be dispersed throughout the local transit network. The majority of the PM peak hour trips would be in the inbound direction for assembly events. Since the PM peak hour transit demand in the Financial District is primarily in the outbound direction, there is excess inbound capacity available to accommodate the trips generated by the proposed project. The estimated PM peak-hour transit trips would likely be distributed among the many transit lines within close proximity, each with several transit vehicles per hour. This increase in transit demand associated with the proposed development would not noticeably affect transit service levels in the project area or substantially affect transit operations. The proposed project would not conflict with adopted policies, plans or programs supporting alternative transportation. Therefore, the proposed project's impact on transit is considered less than significant.

Bicycle Facilities

The proposed project would not substantially interfere with bicycle accessibility to the project site or adjoining areas because no alterations to the adjacent streets are planned. Implementation of the proposed project could encourage more employees to bring their bicycle to the project site as the proposed project would provide employee bicycle parking. More persons bringing their bicycles to the project site would not create potentially hazardous conditions for bicyclists because Muni bus stops, sidewalks, and bikeways exist within close proximity of the project site. Visitors could therefore walk their bicycles safely along sidewalks from nearby Muni bus stops or bikeways or ride along the roadways to the project site. The proposed project would result in less-than-significant impacts related to bicyclists.

Pedestrian Facilities

Pedestrian trips generated by the proposed project would include walking trips to and from the project site (approximately 70 during the PM peak hour) as well as walking trips to and from local transit providers (approximately 300 during the PM peak hour). These additional walking trips would not result in substantial overcrowding on nearby public sidewalks. The proposed project would not include sidewalk narrowing, roadway widening, removal of center medians, or other conditions that could create potentially hazardous conditions or otherwise interfere with pedestrian accessibility to the site and adjoining areas. The area around the project site is characterized by wide sidewalks capable of handling large volumes of pedestrians. Therefore, the proposed project would result in a less-than-significant impact related to pedestrians.

Impact C-TR-1: The proposed project, in combination with past, present, and reasonably foreseeable future projects, would result in less-than-significant cumulative transportation impacts. (Less than Significant)

As described above, the proposed project's trips would not be a substantial proportion of the overall volume of trips in the area. The number of trips associated with cumulative projects in the vicinity would be dispersed throughout the local roadway and transit networks and would not have a substantial adverse impact on the transportation system. The majority of trips would also occur in the inbound direction during the PM peak hour, where there is typically excess capacity available. Growth of the city would occur over time, resulting in a greater number of trips in the future, but the number of trips generated by the proposed project would be relatively low and would not be considerable. The proposed project's construction timeline may overlap with other projects under construction or implementation at the same time, such as 75 Howard Street. While the proposed project's construction may occur concurrently with other projects, it is not expected that the construction schedule of the proposed project would be in conflict with other projects in the area. As required, the project sponsor and construction contractors would meet with the City's TASC to determine feasible methods to reduce traffic congestion, including effects on the transit system and pedestrian circulation impacts during construction of the proposed project. The TASC's analysis of the project would include coordination of construction-related lane closures resulting from other nearby projects. The impact from construction traffic would be temporary and would not cause a substantial adverse change on the transportation system. For these reasons, the proposed project, in combination with other past, present, and reasonably foreseeable future projects, would not result in a cumulatively considerable transportation and circulation impact.

<u>Topics:</u>	<u>Potentially Significant Impact</u>	<u>Less Than Significant with Mitigation Incorporated</u>	<u>Less Than Significant Impact</u>	<u>No Impact</u>	<u>Not Applicable</u>
6. NOISE—Would the project:					
a) Result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input 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"/>
d) Result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 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, topics 6e and 6f are not applicable.

Impact NO-1: The proposed project would not result in a substantial permanent increase in ambient noise levels in the project vicinity, expose persons to noise levels in excess of standards established in the local general plan or noise ordinance, or be substantially affected by existing noise levels.

Ambient noise levels in the vicinity of the project site are typical of noise levels in downtown San Francisco, which are dominated by vehicular traffic, including trucks, cars, Muni buses, emergency vehicles, and land use activities, such as commercial businesses and periodic temporary construction-related noise from nearby development, or street maintenance. Noises generated by such activities are common and generally accepted in urban areas. The proposed project does not include addition of new sensitive receptors (sleeping quarters), and would therefore not be substantially affected by existing noise levels.

Some sensitive receptors, primarily hotels, exist within one block of the project site. The proposed project would include the installation of new roof-mounted mechanical equipment for ventilation purposes, which would produce operational noise, but would not be perceptible in the project vicinity due to existing ambient noise levels. Therefore, the proposed project would not result in a substantial permanent increase in ambient noise levels in the project vicinity.

The San Francisco Noise Ordinance¹⁸ regulates noise generated within the City. Generally, the noise levels generated by non-entertainment commercial properties are from mechanical sources, such as air chillers and handlers. Commercial uses are limited by ordinance to a maximum increase of 8 dBA measured at the property line over the ambient noise level which is the lowest repeating level over a 10-minute period. An approximate doubling in traffic volumes in the area would be necessary to produce an increase in ambient noise levels barely perceptible to most people (a 3 dBA increase).¹⁹ As described in Section E.5. (Transportation and Circulation) above, the proposed project would not double traffic volumes in the project vicinity.

For the above reasons, the proposed project would not result in a substantial permanent increase in ambient noise levels in the project vicinity, expose persons to noise levels in excess of standards established in the local general plan or noise ordinance, or be substantially affected by existing noise levels. This impact would be less than significant.

Impact NO-2: During construction, the proposed project would result in a temporary or periodic increase in ambient noise levels and vibration in the project vicinity above existing levels, but any construction-related increase in noise levels and vibration would be limited in duration and would not be substantial. (Less than Significant)

The proposed project's construction activities would last 14 months. Construction activities would generate noise and possibly vibration that could be considered an annoyance by occupants of nearby properties. No heavy external excavation equipment, such as pile drivers, would be used during construction. Much of the construction work would occur inside the existing building. San Francisco Public Utilities Commission (SFPUC) would also review the proposed construction activities and may require implementation of a vibration monitoring plan to ensure that utility infrastructure is not negatively affected by construction activities. Construction noise would fluctuate depending on the construction phase, equipment type and duration of use, and distance between noise source and listener. Further, construction noise would be intermittent and

¹⁸ Article 29, Section 2909 of the San Francisco Police Code

¹⁹ A decibel is a unit of measurement describing the amplitude of sound, equal to 20 times the logarithm to the base 10 of the ratio of the pressure of the sound measured to the reference pressure, which is 20 micropascals.

limited to the period of construction. The closest sensitive receptors to construction activities would be residents adjacent to the east and west of the project site.

Construction noise is regulated by the San Francisco Noise Ordinance (Article 29 of the Police Code), which requires noise levels from individual pieces of construction equipment, other than impact tools, not exceed 80 dBA at 100 feet from the source. Impact tools must have both intake and exhaust muffled to the satisfaction of the Director of Public Works. Section 2908 of the Ordinance prohibits construction work between 8:00 PM and 7:00 AM if noise would exceed the ambient noise level by 5 dBA at the project property line, unless a special permit is authorized by the Director of Public Works.

Although construction noise could be annoying at times, it would not be expected to exceed noise levels commonly experienced in this urban environment and would not be considered significant. Because the proposed project would be subject to and would comply with regulations set forth in the Noise Ordinance, and due to the limited duration of proposed project construction, the proposed project’s construction noise impact would be less than significant.

Impact C-NO-1: The proposed project, in combination with past, present, and reasonably foreseeable future projects, would not result in substantial cumulative noise impacts. (Less than Significant)

The only other proposed project in the vicinity that would generate substantial noise, either due to construction or operation (e.g. traffic or mechanical noise), would be 75 Howard Street, located approximately 600 feet south of the project site. The proposed project at 75 Howard Street consists of demolishing an existing eight-story parking structure (550 spaces) and constructing a 186-unit, 31-story residential building with a below-grade garage. Both projects are located in the heavily-urbanized downtown business district. Given that the proposed project at 110 The Embarcadero/115 Steuart Street would not require heavy external excavation equipment, such as pile drivers, and much of the construction work would occur inside and above the existing building, the proposed project, in combination with past, present, and reasonably foreseeable future projects would not result in a significant cumulative noise impact.

<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>
7. AIR QUALITY—Would the project:					
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Topics:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Not Applicable
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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input 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"/>

Setting

Overview

BAAQMD is the regional agency with jurisdiction over the nine-county San Francisco Bay Area Air Basin (SFBAAB), which includes San Francisco, Alameda, Contra Costa, Marin, San Mateo, Santa Clara, and Napa Counties and portions of Sonoma and Solano Counties. The BAAQMD is responsible for attaining and maintaining air quality in the SFBAAB within federal and state air quality standards, as established by the federal Clean Air Act (CAA) and the California Clean Air Act (CCAA), respectively. Specifically, the BAAQMD has the responsibility to monitor ambient air pollutant levels throughout the SFBAAB and to develop and implement strategies to attain the applicable federal and state standards. The CAA and the CCAA require plans to be developed for areas that do not meet air quality standards, generally. The most recent air quality plan, the *2010 Clean Air Plan*, was adopted by the BAAQMD on September 15, 2010. The *2010 Clean Air Plan* updates the *Bay Area 2005 Ozone Strategy* in accordance with the requirements of the CCAA to implement all feasible measures to reduce ozone; provide a control strategy to reduce ozone, particulate matter, air toxics, and greenhouse gases in a single, integrated plan; and establish emission control measures to be adopted or implemented. The 2010 Clean Air Plan contains the following primary goals:

- Attain air quality standards;
- Reduce population exposure and protect public health in the San Francisco Bay Area; and
- Reduce greenhouse gas emissions and protect the climate.

The *2010 Clean Air Plan* represents the most current applicable air quality plan for the SFBAAB. Consistency with this plan is the basis for determining whether the proposed project would conflict with or obstruct implementation of air quality plans.

Criteria Air Pollutants

In accordance with the state and federal CAAs, air pollutant standards are identified for the following six criteria air pollutants: ozone, carbon monoxide (CO), particulate matter (PM), nitrogen dioxide (NO₂), sulfur dioxide (SO₂), and lead. These air pollutants are termed criteria air pollutants because they are regulated by developing specific public health- and welfare-based criteria as the basis for setting permissible levels. In general, the SFBAAB experiences low concentrations of most pollutants when compared to federal or state standards. The SFBAAB is designated as either in attainment²⁰ or unclassified for most criteria pollutants with the exception of ozone, PM_{2.5}, and PM₁₀, for which these pollutants are designated as non-attainment for either the state or federal standards. By its very nature, regional air pollution is largely a cumulative impact in that no single project is sufficient in size to, by itself, result in non-attainment of air quality standards. Instead, a project's individual emissions contribute to existing cumulative air quality impacts. If a project's contribution to cumulative air quality impacts is considerable, then the project's impact on air quality would be considered significant.²¹

Land use projects may contribute to regional criteria air pollutants during the construction and operational phases of a project. **Table 1** identifies air quality significance thresholds followed by a discussion of each threshold. Projects that would result in criteria air pollutant emissions below these significance thresholds would not violate an air quality standard, contribute substantially to an air quality violation, or result in a cumulatively considerable net increase in criteria air pollutants within the SFBAAB.

²⁰ "Attainment" status refers to those regions that are meeting federal and/or state standards for a specified criteria pollutant. "Non-attainment" refers to regions that do not meet federal and/or state standards for a specified criteria pollutant. "Unclassified" refers to regions where there is not enough data to determine the region's attainment status for a specified criteria air pollutant.

²¹ Bay Area Air Quality Management District (BAAQMD), *California Environmental Quality Act Air Quality Guidelines*, May 2011, page 2-1.

Table 1
Criteria Air Pollutant Significance Thresholds

Pollutant	Construction Thresholds	Operational Thresholds	
	Average Daily Emissions (lbs./day)	Average Daily Emissions (lbs./day)	Maximum Annual Emissions (tons/year)
ROG	54	54	10
NO _x	54	54	10
PM ₁₀	82 (exhaust)	82	15
PM _{2.5}	54 (exhaust)	54	10
Fugitive Dust	Construction Dust Ordinance or other Best Management Practices	Not Applicable	

Ozone Precursors. As discussed previously, the SFBAAB is currently designated as non-attainment for ozone and particulate matter. Ozone is a secondary air pollutant produced in the atmosphere through a complex series of photochemical reactions involving reactive organic gases (ROG) and oxides of nitrogen (NO_x). The potential for a project to result in a cumulatively considerable net increase in criteria air pollutants, which may contribute to an existing or projected air quality violation, are based on the state and federal Clean Air Acts emissions limits for stationary sources. To ensure that new stationary sources do not cause or contribute to a violation of an air quality standard, BAAQMD Regulation 2, Rule 2 requires that any new source that emits criteria air pollutants above a specified emissions limit must offset those emissions. For ozone precursors ROG and NO_x, the offset emissions level is an annual average of 10 tons per year (or 54 pounds (lbs.) per day).²² These levels represent emissions 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.

Particulate Matter (PM₁₀ and PM_{2.5}).²³ The federal New Source Review (NSR) program was created by the federal CAA to ensure that stationary sources of air pollution are constructed in a manner that is consistent with attainment of federal health based ambient air quality standards. For PM₁₀ and PM_{2.5}, the emissions limit under NSR is 15 tons per year (82 lbs. per day) and 10 tons per year (54 lbs. per day), respectively. These emissions limits represent levels at which a source is not expected to have an impact on air quality.²⁴ Although the regulations specified above apply to new or modified stationary sources, land use development projects result in ROG, NO_x, PM₁₀ and PM_{2.5} emissions as a result of increases in vehicle trips, architectural coating and construction

²² BAAQMD, *Revised Draft Options and Justification Report, California Environmental Quality Act Thresholds of Significance*, October 2009, page 17.

²³ PM₁₀ is often termed “coarse” particulate matter and is made of particulates that are 10 microns in diameter or smaller. PM_{2.5}, termed “fine” particulate matter, is composed of particles that are 2.5 microns or less in diameter.

²⁴ BAAQMD, *Revised Draft Options and Justification Report, California Environmental Quality Act Thresholds of Significance*, October 2009, page 16.

activities. Therefore, the above thresholds can be applied to the construction and operational phases of land use projects and those projects that result in emissions below these thresholds would not be considered to contribute to an existing or projected air quality violation or result in a considerable net increase in ozone precursors or particulate matter. Due to the temporary nature of construction activities, only the average daily thresholds are applicable to construction phase emissions.

Fugitive Dust. Fugitive dust emissions are typically generated during construction phases. Studies have shown that the application of best management practices (BMPs) at construction sites significantly control fugitive dust.²⁵ Individual measures have been shown to reduce fugitive dust by anywhere from 30 to 90 percent.²⁶ The BAAQMD has identified a number of BMPs to control fugitive dust emissions from construction activities.²⁷ The City's Construction Dust Control Ordinance (Ordinance 176-08, effective July 30, 2008) requires a number of fugitive dust control measures to ensure that construction projects do not result in visible dust. The BMPs employed in compliance with the City's Construction Dust Control Ordinance is an effective strategy for controlling construction-related fugitive dust.

Local Health Risks and Hazards

In addition to criteria air pollutants, individual projects may emit toxic air contaminants (TACs). TACs collectively refer to a diverse group of air pollutants that are capable of causing chronic (i.e., of long-duration) and acute (i.e., severe but of short-term) adverse effects to human health, including carcinogenic effects. Human health effects of TACs include birth defects, neurological damage, cancer, and mortality. There are hundreds of different types of TACs with varying degrees of toxicity. Individual TACs vary greatly in the health risk they present; at a given level of exposure, one TAC may pose a hazard that is many times greater than another.

Unlike criteria air pollutants, TACs do not have ambient air quality standards but are regulated by the BAAQMD using a risk-based approach to determine which sources and pollutants to control as well as the degree of control. A health risk assessment is an analysis in which human health exposure to toxic substances is estimated, and considered together with information regarding the toxic potency of the substances, to provide quantitative estimates of health risks.²⁸

²⁵ Western Regional Air Partnership. 2006. *WRAP Fugitive Dust Handbook*. September 7, 2006. This document is available online at http://www.wrapair.org/forums/dejff/dh/content/FDHandbook_Rev_06.pdf, accessed May 12, 2014.

²⁶ BAAQMD, *Revised Draft Options and Justification Report, California Environmental Quality Act Thresholds of Significance*, October 2009, page 27.

²⁷ BAAQMD, *CEQA Air Quality Guidelines*, May 2011.

²⁸ In general, a health risk assessment is required if the BAAQMD concludes that projected emissions of a specific air toxic compound from a proposed new or modified source suggest a potential public health

Air pollution does not affect every individual in the population in the same way, and some groups are more sensitive to adverse health effects than others. Land uses such as residences, schools, children's day care centers, hospitals, and nursing and convalescent homes are considered to be the most sensitive to poor air quality because the population groups associated with these uses have increased susceptibility to respiratory distress or, as in the case of residential receptors, their exposure time is greater than for other land uses. Therefore, these groups are referred to as sensitive receptors. Exposure assessment guidance typically assumes that residences would be exposed to air pollution 24 hours per day, 350 days per year, for 70 years. Therefore, assessments of air pollutant exposure to residents typically result in the greatest adverse health outcomes of all population groups.

Exposures to fine particulate matter (PM_{2.5}) are strongly associated with mortality, respiratory diseases, and lung development in children, and other endpoints such as hospitalization for cardiopulmonary disease.²⁹ In addition to PM_{2.5}, diesel particulate matter (DPM) is also of concern. The California Air Resources Board (ARB) identified DPM as a TAC in 1998, primarily based on evidence demonstrating cancer effects in humans.³⁰ The estimated cancer risk from exposure to diesel exhaust is much higher than the risk associated with any other TAC routinely measured in the region.

In an effort to identify areas of San Francisco most adversely affected by sources of TACs, San Francisco partnered with the BAAQMD to inventory and assess air pollution and exposures from mobile, stationary, and area sources within San Francisco. Areas with poor air quality, termed the "Air Pollutant Exposure Zone," were identified based on two health-protective criteria: (1) excess cancer risk from the contribution of emissions from all modeled sources greater than 100 per one million population, and/or (2) cumulative PM_{2.5} concentrations greater than 10 micrograms per cubic meter (µg/m³).

Excess Cancer Risk. The above 100 per one million persons (100 excess cancer risk) criteria is based on United State Environmental Protection Agency (USEPA) guidance for conducting air toxic analyses and making risk management decisions at the facility and community-scale level.³¹ As described by the BAAQMD, the USEPA considers a cancer risk of 100 per million to be within the "acceptable" range of cancer risk. Furthermore, in the 1989 preamble to the benzene National Emissions Standards for Hazardous Air Pollutants (NESHAP) rulemaking,³² the USEPA states that it "...strives

risk. The applicant is then subject to a health risk assessment for the source in question. Such an assessment generally evaluates chronic, long-term effects, estimating the increased risk of cancer as a result of exposure to one or more TACs.

²⁹ SFDPH, *Assessment and Mitigation of Air Pollutant Health Effects from Intra-Urban Roadways: Guidance for Land Use Planning and Environmental Review*, May 2008.

³⁰ California Air Resources Board (ARB), Fact Sheet, "The Toxic Air Contaminant Identification Process: Toxic Air Contaminant Emissions from Diesel-fueled Engines," October 1998.

³¹ BAAQMD, *Revised Draft Options and Justification Report, California Environmental Quality Act Thresholds of Significance*, October 2009, page 67.

³² 54 Federal Register 38044, September 14, 1989.

to provide maximum feasible protection against risks to health from hazardous air pollutants by (1) protecting the greatest number of persons possible to an individual lifetime risk level no higher than approximately one in one million and (2) limiting to no higher than approximately one in ten thousand [100 in one million] the estimated risk that a person living near a plant would have if he or she were exposed to the maximum pollutant concentrations for 70 years." The 100 per one million excess cancer cases is also consistent with the ambient cancer risk in the most pristine portions of the Bay Area based on BAAQMD regional modeling.³³

Fine Particulate Matter. In April 2011, the USEPA published *Policy Assessment for the Particulate Matter Review of the National Ambient Air Quality Standards*, "Particulate Matter Policy Assessment." In this document, USEPA staff concludes that the current federal annual PM_{2.5} standard of 15 µg/m³ should be revised to a level within the range of 13 to 11 µg/m³, with evidence strongly supporting a standard within the range of 12 to 11 µg/m³. The Air Pollutant Exposure Zone for San Francisco is based on the health protective PM_{2.5} standard of 11 µg/m³, as supported by the USEPA's Particulate Matter Policy Assessment, although lowered to 10 µg/m³ to account for uncertainty in accurately predicting air pollutant concentrations using emissions modeling programs.

Land use projects within the Air Pollutant Exposure Zone require special consideration to determine whether the project's activities would expose sensitive receptors to substantial air pollutant concentrations or add emissions to areas already adversely affected by poor air quality.

Construction Air Quality Impacts

Project-related air quality impacts fall into two categories: short-term impacts from construction and long-term impacts from project operation. The following addresses construction-related air quality impacts resulting from the proposed project.

Impact AQ-1: The proposed project's construction activities would generate fugitive dust and criteria air pollutants, but would not violate an air quality standard, contribute substantially to an existing or projected air quality violation, or result in a cumulatively considerable net increase in criteria air pollutants. (Less than Significant)

Construction activities (short-term) typically result in emissions of ozone precursors and PM in the form of dust (fugitive dust) and exhaust (e.g., vehicle tailpipe emissions). Emissions of ozone precursors and PM are primarily a result of the combustion of fuel from on-road and off-road vehicles. However, ROG's are also emitted from activities that involve painting, other types of architectural coatings, or asphalt paving. The proposed

³³ BAAQMD, *Revised Draft Options and Justification Report, California Environmental Quality Act Thresholds of Significance*, October 2009, page 67.

project includes addition of a new third floor to an existing building, excavation below the existing basement level for shear walls and an elevator pit, and interior work to convert the vacant building to office and assembly uses. During the project's approximately 14 month construction period, construction activities would have the potential to result in emissions of ozone precursors and PM, as discussed below.

Fugitive Dust

Project-related demolition, excavation, grading, and other construction activities may cause wind-blown dust that could contribute particulate matter into the local atmosphere. Although there are federal standards for air pollutants and implementation of state and regional air quality control plans, air pollutants continue to have impacts on human health throughout the country. California has found that particulate matter exposure can cause health effects at lower levels than national standards. The current health burden of particulate matter demands that, where possible, public agencies take feasible available actions to reduce sources of particulate matter exposure. According to the ARB, reducing particulate matter PM_{2.5} concentrations to state and federal standards of 12 µg/m³ in the San Francisco Bay Area would prevent between 200 and 1,300 premature deaths.³⁴

Dust can be an irritant causing watering eyes or irritation to the lungs, nose, and throat. Demolition, excavation, grading, and other construction activities can cause wind-blown dust that adds particulate matter to the local atmosphere. Depending on exposure, adverse health effects can occur due to this particulate matter in general and also due to specific contaminants such as lead or asbestos that may be constituents of soil.

In response, the San Francisco Board of Supervisors approved a series of amendments to the San Francisco Building and Health Codes generally referred hereto as the Construction Dust Control Ordinance (Ordinance 176-08, effective July 30, 2008) with the intent of reducing the quantity of dust generated during site preparation, demolition and construction work in order to protect the health of the general public and of onsite workers, minimize public nuisance complaints, and to avoid orders to stop work by the Department of Building Inspection (DBI).

The Ordinance requires that all site preparation work, demolition, or other construction activities within San Francisco that have the potential to create dust or to expose or disturb more than 10 cubic yards or 500 sf of soil comply with specified dust control measures whether or not the activity requires a permit from DBI. The Director of DBI may waive this requirement for activities on sites less than one half-acre that are unlikely to result in any visible wind-blown dust.

³⁴ ARB, *Methodology for Estimating Premature Deaths Associated with Long-term Exposure to Fine Airborne Particulate Matter in California*, Staff Report, Table 4c, October 24, 2008.

In compliance with the Construction Dust Control Ordinance, the project sponsor and the contractor responsible for construction activities at the project site would be required to use the following practices to control construction dust on the site or other practices that result in equivalent dust control that are acceptable to the Director. Dust suppression activities may include watering all active construction areas sufficiently to prevent dust from becoming airborne; increased watering frequency may be necessary whenever wind speeds exceed 15 miles per hour. Reclaimed water must be used if required by Article 21, Section 1100 et seq. of the San Francisco Public Works Code. If not required, reclaimed water should be used whenever possible. Contractors shall provide as much water as necessary to control dust (without creating run-off in any area of land clearing, and/or earth movement). During excavation and dirt-moving activities, contractors shall wet sweep or vacuum the streets, sidewalks, paths, and intersections where work is in progress at the end of the workday. Inactive stockpiles (where no disturbance occurs for more than seven days) greater than 10 cubic yards or 500 sf of excavated material, backfill material, import material, gravel, sand, road base, and soil shall be covered with a 10 mil (0.01 inch) polyethylene plastic (or equivalent) tarp, braced down, or use other equivalent soil stabilization techniques.

The proposed project site is less than one-half acre in size, so submittal of a Dust Control Plan would not be required.

Compliance with the regulations and procedures set forth in the San Francisco Dust Control Ordinance would ensure that potential dust-related air quality impacts would be reduced to a less-than-significant level.

Criteria Air Pollutants

As discussed above, construction activities would result in emissions of criteria air pollutants from the use of off- and on-road vehicles and equipment. To assist lead agencies in determining whether short-term construction-related air pollutant emissions require further analysis as to whether the project may exceed the criteria air pollutant significance thresholds shown in **Table 1**, above, the BAAQMD, in its *CEQA Air Quality Guidelines* (May 2011), developed screening criteria. If a proposed project meets the screening criteria, then construction of the proposed project would result in less-than-significant criteria air pollutant impacts. A project that exceeds the screening criteria may require a detailed air quality assessment to determine whether criteria air pollutant emissions would exceed significance thresholds. The *CEQA Air Quality Guidelines* note that the screening levels are generally representative of new development on greenfield³⁵ sites without any form of mitigation measures taken into consideration. In

³⁵ A greenfield site refers to agricultural or forest land or an undeveloped site earmarked for commercial, residential, or industrial projects.

addition, the screening criteria do not account for project design features, attributes, or local development requirements that could also result in lower emissions.

The proposed project includes the addition of a third story to the existing building on the project site. BAAQMD does not have criteria air pollutant screening sizes for combined office and assembly buildings, but the size of proposed construction activities would be below the criteria air pollutant screening sizes for any type of commercial or office building identified in the BAAQMD's *CEQA Air Quality Guidelines*. The total size of the building, including existing square footage and the 5,085 sf addition, would be 23,819 sf. The most restrictive commercial or office construction screening size is 277,000 sf. Construction would also not require extensive material transport, which is defined by the BAAQMD guidelines as greater than 10,000 cubic yards of soil import or export. Thus, quantification of construction-related criteria air pollutant emissions is not required and the proposed project's construction activities would result in a less-than-significant criteria air pollutant impact.

Impact AQ-2: The proposed project's construction activities would generate toxic air contaminants, including diesel particulate matter, which would expose sensitive receptors to substantial pollutant concentrations. (Less than Significant with Mitigation)

As discussed above, San Francisco, in partnership with BAAQMD, has modeled and assessed air pollutant impacts from mobile, stationary and area sources within the City. This assessment has resulted in the identification of the Air Pollutant Exposure Zone, based on significance thresholds discussed above for PM_{2.5} and excess cancer risk. The project site is located within an Air Pollutant Exposure Zone, meaning that existing excess cancer risk exceeds 100 per one million and/or ambient PM_{2.5} concentrations exceed 10 µg/m³. Sensitive land uses exist near the proposed project: residences located at 88 Howard Street, approximately 270 feet from the project site.

Off-road equipment (which includes construction-related equipment) is a large contributor to DPM emissions in California, although since 2007, the ARB has found the emissions to be substantially lower than previously expected.³⁶ Newer and more refined emission inventories have substantially lowered the estimates of DPM emissions from off-road equipment such that off-road equipment is now considered the sixth largest source of DPM emissions in California.³⁷ For example, revised PM emission estimates for the year 2010, which DPM is a major component of total PM, have

³⁶ ARB, *Staff Report: Initial Statement of Reasons for Proposed Rulemaking, Proposed Amendments to the Regulation for In-Use Off-Road Diesel-Fueled Fleets and the Off-Road Large Spark-Ignition Fleet Requirements*, p.1 and p. 13 (Figure 4), October 2010.

³⁷ ARB, *Staff Report: Initial Statement of Reasons for Proposed Rulemaking, Proposed Amendments to the Regulation for In-Use Off-Road Diesel-Fueled Fleets and the Off-Road Large Spark-Ignition Fleet Requirements*, October 2010.

decreased by 83 percent from previous 2010 emissions estimates for the SFBAAB.³⁸ Approximately half of the reduction in emissions can be attributed to the economic recession and half to updated methodologies used to better assess construction emissions.³⁹

Additionally, a number of federal and state regulations are requiring cleaner off-road equipment. Specifically, both the USEPA and California have set emissions standards for new off-road equipment engines, ranging from Tier 1 to Tier 4. Tier 1 emission standards were phased in between 1996 and 2000 and Tier 4 Interim and Final emission standards for all new engines would be phased in between 2008 and 2015. To meet the Tier 4 emission standards, engine manufacturers will be required to produce new engines with advanced emission-control technologies. Although the full benefits of these regulations will not be realized for several years, the USEPA estimates that by implementing the federal Tier 4 standards, NO_x and PM emissions will be reduced by more than 90 percent.⁴⁰ Furthermore, California regulations limit maximum idling times to five minutes, which further reduces public exposure to NO_x and PM emissions.⁴¹

In addition, construction activities do not lend themselves to analysis of long-term health risks because of their temporary and variable nature. As explained in the BAAQMD's *CEQA Air Quality Guidelines*:

“Due to the variable nature of construction activity, the generation of TAC emissions in most cases would be temporary, especially considering the short amount of time such equipment is typically within an influential distance that would result in the exposure of sensitive receptors to substantial concentrations. Concentrations of mobile-source diesel PM emissions are typically reduced by 70 percent at a distance of approximately 500 feet (ARB 2005). In addition, current models and methodologies for conducting health risk assessments are associated with longer-term exposure periods of 9, 40, and 70 years, which do not correlate well with the temporary and highly variable nature of construction activities. This results in difficulties with producing accurate estimates of health risk.”⁴²

Therefore, project-level analyses of construction activities have a tendency to produce overestimated assessments of long-term health risks. However, within the Air Pollutant Exposure Zone, as discussed above, additional construction activity may adversely

³⁸ ARB, “In-Use Off-Road Equipment, 2011 Inventory Model,” Query accessed online, May 12, 2014, http://www.arb.ca.gov/msei/categories.htm#inuse_or_category.

³⁹ ARB, *Staff Report: Initial Statement of Reasons for Proposed Rulemaking, Proposed Amendments to the Regulation for In-Use Off-Road Diesel-Fueled Fleets and the Off-Road Large Spark-Ignition Fleet Requirements*, October 2010.

⁴⁰ USEPA, “Clean Air Nonroad Diesel Rule: Fact Sheet,” May 2004.

⁴¹ California Code of Regulations, Title 13, Division 3, § 2485.

⁴² BAAQMD, *CEQA Air Quality Guidelines*, May 2011, page 8-6.

affect populations that are already at a higher risk for adverse long-term health risks from existing sources of air pollution.

The proposed project would require construction activities for the approximate 14-month construction period. Project construction activities would result in short-term emissions of DPM and other TACs. The project site is located in an area that already experiences poor air quality and project construction activities would generate additional air pollution, affecting nearby sensitive receptors and resulting in a significant impact. Implementation of Mitigation Measure M-AQ-2, Construction Emissions Minimization, would reduce the magnitude of this impact to a less-than-significant level. While emission reductions from limiting idling, educating workers and the public and properly maintaining equipment are difficult to quantify, other measures, specifically the requirement for equipment with Tier 2 engines and Level 3 Verified Diesel Emission Control Strategy (VDECS) can reduce construction emissions by 89 to 94 percent compared to equipment with engines meeting no emission standards and without a VDECS. Emissions reductions from the combination of Tier 2 equipment with level 3 VDECS is almost equivalent to requiring only equipment with Tier 4 Final engines, which is not yet available for engine sizes subject to the mitigation. Therefore, compliance with Mitigation Measure M-AQ-2, to which the project sponsor has agreed, would reduce potential construction emissions impacts to nearby sensitive receptors to a less-than-significant level. The project sponsor has provided a certification statement identifying construction phasing and equipment for the proposed project.⁴³ Revisions to the statement may be made as design of the proposed project progresses, but would still be consistent with Mitigation Measure M-AQ-2.

Mitigation Measure M-AQ-2: Construction Emissions Minimization

- A. *Construction Emissions Minimization Plan.* Prior to issuance of a construction permit, the project sponsor shall submit a Construction Emissions Minimization Plan (Plan) to the Environmental Review Officer (ERO) for review and approval by an Environmental Planning Air Quality Specialist. The Plan shall detail project compliance with the following requirements:
1. All off-road equipment greater than 25 hp and operating for more than 20 total hours over the entire duration of construction activities shall meet the following requirements:
 - a) Where access to alternative sources of power are available, portable diesel engines shall be prohibited;

⁴³ *Certification Statement, Commonwealth Club, 110 Embarcadero, San Francisco, CA.* This document is available for review at 1650 Mission Street, 4th Floor, as part of Case No. 2011.1388E.

- b) All off-road equipment shall have:
 - i. Engines that meet or exceed either U.S. Environmental Protection Agency (USEPA) or California Air Resources Board (ARB) Tier 2 off-road emission standards, and
 - ii. Engines that are retrofitted with an ARB Level 3 Verified Diesel Emissions Control Strategy (VDECS).⁴⁴
- c) Exceptions:
 - i. Exceptions to A(1)(a) may be granted if the project sponsor has submitted information providing evidence to the satisfaction of the ERO that an alternative source of power is limited or infeasible at the project site and that the requirements of this exception provision apply. Under this circumstance, the sponsor shall submit documentation of compliance with A(1)(b) for onsite power generation.
 - ii. Exceptions to A(1)(b)(ii) *may* be granted if the project sponsor has submitted information providing evidence to the satisfaction of the ERO that a particular piece of off-road equipment with an ARB Level 3 VDECS is: (1) technically not feasible, (2) would not produce desired emissions reductions due to expected operating modes, (3) installing the control device would create a safety hazard or impaired visibility for the operator, or (4) there is a compelling emergency need to use off-road equipment that are not retrofitted with an ARB Level 3 VDECS and the sponsor has submitted documentation to the ERO that the requirements of this exception provision apply. If granted an exception to A(1)(b)(ii), the project sponsor must comply with the requirements of A(1)(c)(iii).

⁴⁴ Equipment with engines meeting Tier 4 Interim or Tier 4 Final emission standards automatically meet this requirement, therefore a VDECS would not be required.

- iii. If an exception is granted pursuant to A(1)(c)(ii), the project sponsor shall provide the next cleanest piece of off-road equipment as provided by the step down schedules in **Table 2**.

Table 2 – Off-Road Equipment Compliance Step-down Schedule

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

How to use the table: If the requirements of (A)(1)(b) cannot be met, then the project sponsor would need to meet Compliance Alternative 1. Should the project sponsor not be able to supply off-road equipment meeting Compliance Alternative 1, then Compliance Alternative 2 would need to be met. Should the project sponsor not be able to supply off-road equipment meeting Compliance Alternative 2, then Compliance Alternative 3 would need to be met.

* Alternative fuels are not a VDECS.

- 2. The project sponsor shall require the idling time for off-road and on-road equipment be limited to no more than two minutes, except as provided in exceptions to the applicable state regulations regarding idling for off-road and on-road equipment. Legible and visible signs shall be posted in multiple languages (English, Spanish, Chinese) in designated queuing areas and at the construction site to remind operators of the two minute idling limit.
- 3. The project sponsor shall require that construction operators properly maintain and tune equipment in accordance with manufacturer specifications.
- 4. The Plan shall include estimates of the construction timeline by phase with a description of each piece of off-road equipment required for every construction phase. Off-road equipment descriptions and information may include, but is not limited to: equipment type, equipment manufacturer, equipment identification number, engine model year, engine certification (Tier rating), horsepower, engine serial number, and expected fuel usage and hours of operation. For VDECS installed: technology type, serial number, make, model, manufacturer, ARB verification number level, and installation date and hour meter reading on installation date. For off-road equipment using alternative fuels, reporting shall indicate the type of alternative fuel being used.

5. The Plan shall be kept on-site and available for review by any persons requesting it and a legible sign shall be posted at the perimeter of the construction site indicating to the public the basic requirements of the Plan and a way to request a copy of the Plan. The project sponsor shall provide copies of Plan to members of the public as requested.
- B. *Reporting.* Quarterly reports shall be submitted to the ERO indicating the construction phase and off-road equipment information used during each phase including the information required in A(4). In addition, for off-road equipment using alternative fuels, reporting shall include the actual amount of alternative fuel used.

Within six months of the completion of construction activities, the project sponsor shall submit to the ERO a final report summarizing construction activities. The final report shall indicate the start and end dates and duration of each construction phase. For each phase, the report shall include detailed information required in A(4). In addition, for off-road equipment using alternative fuels, reporting shall include the actual amount of alternative fuel used.

- C. *Certification Statement and On-site Requirements.* Prior to the commencement of construction activities, the project sponsor must certify (1) compliance with the Plan, and (2) all applicable requirements of the Plan have been incorporated into contract specifications.

With implementation of this mitigation measure, the proposed project's construction-related air quality impacts would be less than significant.

Operational Air Quality Impacts

Land use projects typically result in emissions of criteria air pollutants and toxic air contaminants primarily from an increase in motor vehicle trips. However, land use projects may also result in criteria air pollutants and toxic air contaminants from combustion of natural gas, landscape maintenance, use of consumer products, and architectural coating. The following addresses air quality impacts resulting from operation of the proposed project.

Impact AQ-3: During project operations, the proposed project would result in emissions of criteria air pollutants, but not at levels that would violate an air quality standard, contribute to an existing or projected air quality violation, or result in a cumulatively considerable net increase in criteria air pollutants. (Less than Significant)

As discussed above in Impact AQ-1, the BAAQMD, in its *CEQA Air Quality Guidelines* (May 2011), has developed screening criteria to determine whether a project requires an analysis of project-generated criteria air pollutants. If all the screening criteria are met by

a proposed project, then the lead agency or applicant does not need to perform a detailed air quality assessment.

The proposed project includes addition of a third story to an existing building, which would contain office and assembly uses. The proposed project would be below the criteria air pollutant screening sizes for any type of office use. The most restrictive office screening criteria identified in the BAAQMD's *CEQA Air Quality Guidelines* is for government office buildings (61,000 sf), and the proposed building including existing square footage and the 5,085 sf addition, would have 23,819 sf of floor area. Thus, quantification of project-generated criteria air pollutant emissions is not required, and the proposed project would not exceed any of the significance thresholds for criteria air pollutants, and would result in less than significant impact with respect to criteria air pollutants.

Impact AQ-4: The proposed project would not generate substantial amounts of toxic air contaminants, including diesel particulate matter, exposing sensitive receptors to substantial air pollutant concentrations. (Less than Significant)

As discussed above in "Local Health Risks and Hazards," San Francisco, in partnership with BAAQMD, has modeled and assessed air pollutant impacts from mobile, stationary and area sources within the City. This assessment has resulted in the identification of the Air Pollutant Exposure Zone, or areas within the City that deserve special attention when siting uses that either emit toxic air contaminants or uses that are considered sensitive to air pollution. Sensitive land uses exist near the proposed project: residences located at 88 Howard Street, approximately 270 feet from the project site. The proposed project would not add any new sensitive land uses.

Sources of Toxic Air Contaminants

Individual projects result in emissions of toxic air contaminants primarily as a result of an increase in vehicle trips. The BAAQMD considers roads with less than 10,000 vehicles per day "minor, low-impact" sources that do not pose a significant health impact even in combination with other nearby sources and recommends that these sources be excluded from the environmental analysis. The proposed project's approximately 120 daily vehicle trips would be well below this level and would be distributed among the local roadway network, therefore an assessment of project-generated TACs resulting from vehicle trips is not required and the proposed project would not generate a substantial amount of TAC emissions that could affect nearby sensitive receptors. The proposed project would not include an emergency diesel generator. Therefore, the proposed project would not present an operational health risk, and this impact would be less than significant.

Impact AQ-5: The proposed project would not conflict with, or obstruct implementation of, the 2010 Clean Air Plan. (Less than Significant).

The most recently adopted air quality plan for the SFBAAB is the *2010 Clean Air Plan*. The *2010 Clean Air Plan* is a road map that demonstrates how the San Francisco Bay Area will achieve compliance with the state ozone standards as expeditiously as practicable and how the region will reduce the transport of ozone and ozone precursors to neighboring air basins. In determining consistency with the *2010 Clean Air Plan* (CAP), this analysis considers whether the project would: (1) support the primary goals of the CAP, (2) include applicable control measures from the CAP, and (3) avoid disrupting or hindering implementation of control measures identified in the CAP.

The primary goals of the CAP are to: (1) reduce emissions and decrease concentrations of harmful pollutants, (2) safeguard the public health by reducing exposure to air pollutants that pose the greatest health risk, and (3) reduce greenhouse gas emissions. To meet the primary goals, the CAP recommends specific control measures and actions. These control measures are grouped into various categories and include stationary and area source measures, mobile source measures, transportation control measures, land use measures, and energy and climate measures. The CAP recognizes that to a great extent, community design dictates individual travel mode, and that a key long-term control strategy to reduce emissions of criteria pollutants, air toxics, and greenhouse gases from motor vehicles is to channel future Bay Area growth into vibrant urban communities where goods and services are close at hand, and people have a range of viable transportation options. To this end, the *2010 Clean Air Plan* includes 55 control measures aimed at reducing air pollution in the SFBAAB.

The measures most applicable to the proposed project are transportation control measures and energy and climate control measures. The proposed project's impact with respect to GHGs are discussed in the "Greenhouse Gas Emissions" section below, which demonstrates that the proposed project would comply with the applicable provisions of the City's Greenhouse Gas Reduction Strategy.

The compact development of the proposed project and high availability of viable transportation options ensure that residents could bicycle, walk, and ride transit to and from the project site instead of taking trips via private automobile. These features ensure that the project would avoid substantial growth in automobile trips and vehicle miles traveled. The proposed project's approximately 120 net new daily vehicle trips would result in a negligible increase in air pollutant emissions. Furthermore, the proposed project would be generally consistent with the General Plan, as discussed in the "Compatibility with Existing Plans and Zoning" section above. Transportation control measures that are identified in the *2010 Clean Air Plan* are implemented by the General Plan and the Planning Code, for example, through the City's Transit First Policy, bicycle parking requirements, and transit impact development fees. Compliance with these requirements would ensure the project includes relevant transportation control measures specified in the *2010 Clean Air Plan*. Therefore, the proposed project would

include applicable control measures identified in the CAP to meet the CAP's primary goals.

Examples of a project that could cause the disruption or delay of *Clean Air Plan* control measures are projects that would preclude the extension of a transit line or bike path, or projects that propose excessive parking beyond parking requirements. The proposed project would add office and assembly uses to a dense, walkable urban area (San Francisco's Financial District) near a concentration of regional and local transit service. It would not preclude the extension of a transit line or a bike path or any other transit improvement, and thus would not disrupt or hinder implementation of control measures identified in the CAP.

For the reasons described above, the proposed project would not interfere with implementation of the *2010 Clean Air Plan*, and because the proposed project would be consistent with the applicable air quality plan that demonstrates how the region will improve ambient air quality and achieve the state and federal ambient air quality standards, this impact would be less than significant.

Impact AQ-6: The proposed project would not create objectionable odors that would affect a substantial number of people. (Less than Significant)

Typical odor sources of concern include wastewater treatment plants, sanitary landfills, transfer stations, composting facilities, petroleum refineries, asphalt batch plants, chemical manufacturing facilities, fiberglass manufacturing facilities, auto body shops, rendering plants, and coffee roasting facilities. During construction, diesel exhaust from construction equipment would generate some odors. However, construction-related odors would be temporary and would not persist upon project completion. Observation indicates that the project site is not substantially affected by sources of odors, as observed during a site visit performed on May 30, 2014. Additionally, the proposed project consists of office and assembly uses, and would therefore not create a significant source of new odors. Therefore, odor impacts would be less than significant.

Cumulative Air Quality Impacts

Impact C-AQ-1: The proposed project, in combination with past, present, and reasonably foreseeable future development in the project area would contribute to cumulative air quality impacts. (Less than Significant with Mitigation)

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.⁴⁵ 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 (Impact AQ-1) and operational (Impact AQ-3) emissions would not exceed the project-level thresholds for criteria air pollutants, the proposed project would not be considered to result in a cumulatively considerable contribution to regional air quality impacts.

As discussed above, the project site is located in an area that already experiences poor air quality. The project would add new vehicle trips and include construction within an area already adversely affected by air quality, resulting in a considerable contribution to cumulative health risk impacts on sensitive receptors. This would be a significant cumulative impact. The proposed project would be required to implement Mitigation Measure M-AQ-2, Construction Emissions Minimization, as shown under Impact AQ-2 above, which could reduce construction period emissions by as much as 94 percent. Implementation of this mitigation measure would reduce the project's contribution to cumulative air quality impacts to a less-than-significant level.

<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>
8. GREENHOUSE GAS EMISSIONS— Would the project:					
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input 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"/>

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 contribute to global climate change and its associated environmental impacts.

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

⁴⁵ BAAQMD, *CEQA Air Quality Guidelines*, May 2011, page 2-1.

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 greenhouse gases and describes the required contents of such a plan. Accordingly, San Francisco has prepared *Strategies to Address Greenhouse Gas Emissions (GHG Reduction Strategy)*⁴⁶ which presents a comprehensive assessment of policies, programs, and ordinances that collectively represent San Francisco's Qualified GHG Reduction Strategy in compliance with CEQA guidelines. The actions outlined in the strategy have resulted in a 14.5 percent reduction in GHG emissions in 2010 compared to 1990 levels, exceeding the year 2020 reduction goals outlined in the BAAQMD's *2010 Clean Air Plan*, Executive Order S-3- 05,⁴⁷ and Assembly Bill 32 (also known as the Global Warming Solutions Act.)^{48,49}

Given that the City's local greenhouse gas reduction targets are more aggressive than the State and Region's 2020 GHG reduction targets and consistent with the long-term 2050 reduction targets, the City's Greenhouse Gas Reduction Strategy is consistent with the goals of EO S-3-05, AB 32, and the Bay Area 2010 Clean Air Plan. Therefore, proposed projects that are consistent with the City's Greenhouse Gas Reduction Strategy would be consistent with the goals of EO S-3-05, AB 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.

The following analysis of the proposed project's impact on climate change focuses on the project's contribution to cumulatively significant GHG emissions. Given the analysis is in a cumulative context, this section does not include an individual project-specific impact statement.

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

⁴⁷ Executive Order S-3-05, sets forth a series of target dates by which statewide emissions of GHGs need to be progressively reduced, as follows: by 2010, reduce GHG emissions to 2000 levels (approximately 457 million MTCO₂E); by 2020, reduce emissions to 1990 levels (estimated at 427 million MTCO₂E); and by 2050 reduce emissions to 80 percent below 1990 levels (approximately 85 million MTCO₂E).

⁴⁸ San Francisco Department of Environment (DOE), "San Francisco Community-Wide Carbon Emissions by Category." Excel spreadsheet provided via email between Pansy Gee, DOE and Wade Wietgreffe, San Francisco Planning Department. June 7, 2013.

⁴⁹ The *Clean Air Plan*, Executive Order S-3-05, and Assembly Bill 32 goals, among others, are to reduce GHGs in the year 2020 to 1990 levels.

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)

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 activity onsite by adding a third story to the existing building and rehabilitating it for office and assembly uses. Therefore, the proposed project would contribute to annual long-term increases in GHGs as a result of increased vehicle trips (mobile sources) and office and assembly operations that result in an increase in energy use, water use and wastewater treatment, and solid waste disposal. Construction activities would also result in temporary increases in GHG emissions.

The proposed project would be subject to and required to comply with several regulations adopted to reduce GHG emissions as identified in the GHG Reduction Strategy. The regulations that are applicable to the proposed project include the Commuter Benefits Ordinance, Emergency Ride Home Program, Transit Impact Development Fee, Bicycle Parking requirements, Street Tree Planting Requirements for New Construction, Mandatory Recycling and Composting Ordinance, and SF Green Building Requirements for Energy Efficiency, Water Efficient Irrigation requirements, Commercial Water Conservation Ordinance, Commercial Buildings Energy Performance Ordinance, Construction and Demolition Debris Recovery Ordinance, Light Pollution Reduction, and building material-related requirements.

These regulations, as outlined in San Francisco's *Strategies to Address Greenhouse Gas Emissions*, have proven effective as San Francisco's GHG emissions have measurably reduced when compared to 1990 emissions levels, 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. The proposed project was determined to be consistent with San Francisco's GHG Reduction Strategy.⁵⁰ Other existing regulations, such as those implemented through AB 32, will continue to reduce a proposed project's contribution to climate change. Therefore, the proposed project's GHG emissions would not conflict with state, regional, and local GHG reduction plans and regulations, and thus the proposed project's contribution to GHG emissions would not be cumulatively considerable or generate GHG emissions, either directly or indirectly, that would have a

⁵⁰ Greenhouse Gas Analysis: Compliance Checklist. June 6, 2014. This document is available for review at 1650 Mission Street, 4th Floor, as part of Case No. 2011.1388E.

significant impact on the environment. As such, the proposed project would result in a less-than-significant impact with respect to GHG emissions. 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>
9. WIND AND SHADOW—Would the project:					
a) Alter wind in a manner that substantially affects public areas?	<input type="checkbox"/>	<input type="checkbox"/>	<input 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. (Less than Significant)

Wind impacts are generally caused by large building masses extending substantially above their surroundings and by buildings oriented such that a large wall catches a prevailing wind, particularly if such a wall includes little or no articulation. Existing buildings on the same block as the project site are between two and eight stories in height, and surrounding blocks contain high-rise buildings. The existing building on the project site is 35 feet tall. The proposed project would add a third story to the existing building and rehabilitate it for office and assembly uses. The total height of the building with the proposed addition would be 51'-1" (62'-10" including parapets, rooftop access, and mechanical equipment). This addition would result in a minor addition to an existing building, and the buildings in the project vicinity are of similar height or taller, so the proposed project would not be expected to substantially increase ground-level winds. Thus, the proposed project would result in a less-than-significant wind impact.

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

Section 295 of the *Planning Code* was adopted in response to Proposition K (passed November 1984) in order to protect certain public open spaces under the jurisdiction of the Recreation and Park Commission from shadowing by new and altered structures during the period between one hour after sunrise and one hour before sunset, year round. Section 295 restricts new shadow upon public open spaces under the jurisdiction of the Recreation and Park Commission by any structure exceeding 40 feet in height unless the Planning Commission finds the shadow to be an insignificant effect. The nearest public open space to the project site is Justin Herman Plaza, approximately 375 feet to the north. The proposed project would add a third story to the existing building and rehabilitate it for office and assembly uses. The total height of the building with the

proposed addition would be 51'-6" (63'-3" including parapets, rooftop access, and mechanical equipment). A shadow study was prepared for the proposed project. The study found that shadows cast by existing buildings in the vicinity subsume any potential new shadow that the proposed project could cast on Justin Herman Plaza. At times when any new shadow would be cast by the proposed project that is not subsumed by existing shadows, the proposed project's shadow would not be long enough to reach Justin Herman Plaza.⁵¹ Therefore, the project's potential shadow impacts would be less than significant.

Impact C-WS-1: The proposed project, in combination with other past, present, or reasonably foreseeable future projects, would result in less-than-significant cumulative impacts to wind and shadow. (Less than Significant)

The proposed project, as discussed above, would not result in significant shadow or wind impacts. The design of other Financial District projects, including 75 Howard Street, would be required to comply with the applicable height and bulk requirements, as defined in the Planning Code. With such building scale and design conformity, the proposed project together with existing and future development would not combine with other nearby projects to result in a significant cumulatively considerable contribution to shadow or wind impacts.

<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. 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 parks or recreational facilities. (Less than Significant)

The nearest recreation facilities to the project site include Justin Herman Plaza and Sue Bierman Park, within two blocks of the project site. The proposed project would minimally increase the use of recreational facilities and parks due to an increase in

⁵¹ ESA, "110 The Embarcadero, San Francisco, Shadow Study," March 6, 2014. This document is available for review at 1650 Mission Street, 4th Floor, as part of Case No. 2011.1388E.

employees and visitors on the project site. This minor increase in the existing demand for public recreational facilities in this area would not result in substantial physical deterioration of existing recreational resources. Therefore, impacts on recreational activities and facilities would be less than significant.

Impact RE-2: The proposed project would not require the construction of recreational facilities that may have a significant effect on the environment. (Less than Significant)

The proposed project would result in a negligible increase in the use of existing recreational facilities and parks in the area due to the increase of employees and visitors at the project site. Therefore, it would not necessitate the construction of new recreational facilities or the expansion of existing facilities and the impact would be less than significant.

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

The proposed project would not result in the physical alteration or degradation of any recreational resource. The proposed project would add a third story to an existing building and rehabilitate it for office and assembly uses. Therefore, the proposed project would not result in physical degradation of any existing recreational resources.

Impact C-RE: The proposed project, in combination with past, present, and reasonably foreseeable future projects in the vicinity, would not considerably contribute to cumulative recreational impacts. (Less than Significant)

The use of recreational facilities in the vicinity of the project site is not expected to noticeably increase as a result of the proposed project. As mentioned above, the proposed project would add a third story to an existing building and rehabilitate it for office and assembly uses. The proposed project would include rooftop open space, and future developments would also be subject to Planning Code open space requirements. For these reasons, the proposed project, in combination with other past, present, and reasonably foreseeable future projects, would not result in a cumulatively considerable recreation impact.

<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. 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"/>

Impact UT-1: Implementation of the proposed project would not exceed wastewater treatment requirements, exceed the capacity of the wastewater treatment provider serving the project site, or result in the construction of new or expansion of existing wastewater treatment or stormwater drainage facilities. (Less than Significant)

Proposed project-related wastewater and stormwater would flow to the City's combined stormwater and 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 the Bay. The NPDES standards are set and regulated by the San Francisco Bay Area Regional Water Quality Control (RWQCB), therefore, the proposed project would not conflict with RWQCB requirements.

The project site is completely covered with impervious surfaces, and would remain completely covered with implementation of the proposed project. Therefore, the

proposed project would not substantially affect the amount of stormwater discharged from the project site. Compliance with the City's Stormwater Management Ordinance (Ordinance No. 83-10) will require the proposed project to maintain, reduce, or eliminate the existing volume and rate of stormwater runoff discharged from the project site. To achieve this, the proposed project would implement and install appropriate stormwater management systems that retain runoff onsite, promote stormwater reuse, and limit (or eliminate altogether) site discharges entering the combined sewer collection system. This in turn would limit the incremental demand on both the collection system and wastewater facilities resulting from stormwater discharges, and minimize the potential for upsizing or constructing new facilities. Therefore, the proposed project would not substantially increase the demand for wastewater or stormwater treatment and would result in a less than significant impact.

Impact UT-2: The SFPUC has sufficient water supply and entitlements to serve the proposed project and implementation of the proposed project would not require expansion or construction of new water treatment facilities. (Less than Significant)

The proposed project would increase the amount of water required to serve the project site. All large-scale projects in California subject to CEQA are required to obtain an assessment from a regional or local jurisdiction water agency to determine the availability of a long-term water supply sufficient to satisfy project-generated water demand under Senate Bill 610 and Senate Bill 221.45. Under Senate Bill 610, a Water Supply Assessment (WSA) is required if a proposed project is subject to CEQA in an Environmental Impact Report or Negative Declaration and is any of the following: (1) a residential development of more than 500 dwelling units; (2) a shopping center of business employing more than 1,000 persons or having more than 500,000 sf of floor space; (3) a commercial office building employing more than 1,000 persons or having more than 250,000 sf of floor space; (4) a hotel or motel with more than 500 rooms; (5) an industrial or manufacturing establishment housing more than 1,000 persons or having more than 650,000 sf or 40 acres; (6) a mixed-use project containing any of the foregoing; or (7) any other project that would have water demand at least equal to a 500 dwelling unit project. The proposed project would not exceed any of these thresholds and therefore would not be required to prepare a WSA.

In June 2011, the SFPUC adopted a resolution finding that the SFPUC's 2010 Urban Watershed Management Plan (UWMP) adequately fulfills the requirements of the water assessment for urban water suppliers. The UWMP uses year 2035 growth projections prepared by the Planning Department and Association of Bay Area Governments to estimate future water demand. The proposed project would not include residential uses, and would not result in a population increase. The proposed project is within the demand projections of the UWMP and would not exceed the water supply projections.

The proposed project would add a third story to the existing building on the project site and rehabilitate it for office and assembly uses. Although the total amount of restroom

fixtures would increase within the building, the rehabilitations would be designed to incorporate water-conserving measures, such as low-flush toilets and urinals, as required by the California State Building Code Section 402.0(c). Because the water demand could be accommodated by existing and planned water supply anticipated under the SFPUC's 2010 UWMP and would include water conservation devices, the proposed project would not result in a substantial increase in water use and would be served from existing water supply entitlements and resources. Therefore, the proposed project would not require the expansion of water facilities and would result in a less than significant impact.

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

The majority of San Francisco's solid waste that is not recycled is disposed of in the Altamont Landfill. As of March 2013, San Francisco's remaining capacity at the landfill was 1,052,815 tons out of the original 15 million ton capacity.⁵² At current disposal rates, San Francisco's available landfill space under the existing contract will run out in January 2015. However, as of the year 2005 (latest year of record), the landfill has a closure date in 2025 and a remaining capacity of 74 percent.⁵³ San Francisco Ordinance No. 27-06 requires a minimum of 65 percent of all construction and demolition debris to be recycled and diverted from landfills. San Francisco had a goal of 75 percent solid waste diversion by 2010 and has a goal of 100 percent solid waste diversion by 2020. San Francisco diverted 80 percent of their solid waste in the year 2010.⁵⁴

With implementation of the proposed project, new trash receptacles would be in place at the project site and occupants would participate in the City's recycling and composting programs and other efforts to reduce the solid waste disposal stream. Due to the existing and anticipated increase of solid waste recycling in the City and the Altamont Landfill's remaining capacity, any increase in solid waste from the project site would be accommodated by the existing landfill and thus would have less-than-significant impacts on solid waste facilities.

⁵² San Francisco Department of the Environment (DOE), "Zero Waste FAQ." Available online at: <http://www.sfenvironment.org/zero-waste/overview/zero-waste-faq>. Accessed August 1, 2013.

⁵³ CalRecycle, "Active Landfills Profile for Altamont Landfill and Resource Recv'ry (01-AA-0009)." Available online at: <http://www.calrecycle.ca.gov/SWFacilities/Directory/01-AA-0009/Detail/>. Accessed August 1, 2013.

⁵⁴ DOE, "Mayor Lee Announces San Francisco Reaches 80 Percent Landfill Waste Diversion, Leads All Cities in North America." Available online at: <http://www.sfenvironment.org/zero-waste/overview/goals>. Accessed August 1, 2013.

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

The California Integrated Waste Management Act of 1989 (Assembly Bill 939) requires municipalities to adopt an Integrated Waste Management Plan to establish objectives, policies, and programs relative to waste disposal, management, source reduction, and recycling. San Francisco Ordinance No. 27-06 requires a minimum of 65 percent of all construction and demolition debris to be recycled and diverted from landfills. San Francisco Ordinance No. 100-09 requires everyone in San Francisco to separate their solid waste into recyclables, compostables, and trash. The proposed project would be subject to and would comply with San Francisco Ordinance No. 27-06, San Francisco Ordinance No. 100-09 and all other applicable statutes and regulations related to solid waste. Therefore, the proposed project’s impact to solid waste would be less than significant.

Impact C-UT-1: The proposed project in combination with past, present, and reasonably foreseeable future projects in the vicinity, would result in less-than-significant cumulative impacts to utilities and service systems. (Less than Significant)

The proposed project would not substantially affect utility provision or service, and existing service management plans address anticipated growth in the region. For these reasons, the proposed project, in combination with other past, present, and reasonably foreseeable future projects, would not result in a cumulatively considerable utilities and service systems impact.

<u>Topics:</u>	<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. 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"/>

For a discussion of impacts on parks, refer to Topics 10a, b, and c above.

Impact PS-1: The proposed project would not substantially increase demand for police service and would not result in substantial adverse impacts associated with the provision of such service. (Less than Significant)

The project site currently receives police protection services from the San Francisco Police Department. The Southern police station at 850 Bryant Street, approximately 1.7 miles away, serves the project site. Adding a third story to the existing vacant building and rehabilitating it for office and assembly uses would incrementally increase demand for police services in the area. Given the nature and scale of the proposed project, it would not necessitate the construction of a new police station or alteration of an existing one in order to meet performance objectives. Impacts on police protection services would be less than significant.

Impact PS-2: The proposed project would not increase demand for fire protection services and would not result in substantial adverse impacts associated with the provision of such service. (Less than Significant)

The project site currently receives fire protection services from the San Francisco Fire Department. The nearest fire station to the project site is Station #35, located approximately 0.3 miles away at Pier 22 ½ (The Embarcadero and Harrison Street). The proposed project could increase the demand for fire protection service within the project area during construction and operation. The proposed construction would be subject to and would comply with the regulations of the California Fire Code, which establishes requirements pertaining to fire protection systems, including the provision of state-mandated fire alarms, fire extinguishers, appropriate building access and egress, and emergency response notification systems. Therefore, the proposed project would not necessitate the construction of a new fire station or physical alteration of an existing one in order to meet performance objectives. Impacts on fire protection services would be less than significant.

Impact PS-3: The proposed project would not directly or indirectly generate school students, and there would be no impact on existing school facilities. (No Impact)

The proposed project does not include dwelling units, and would not add new population to the area. It would not have an impact on schools or generate new student enrollment. Thus, the proposed project would not result in any additional demand for school facilities and would not necessitate new or physically altered school facilities. Therefore, the proposed project would have no impact on schools.

Impact PS-4: The proposed project would not increase the demand for government services, and there would be no impact on government facilities. (Less than Significant)

The proposed project does not include dwelling units, and would not result in a population increase. The project would not generate noticeable additional demand for

government services, and would not necessitate new or physically altered government facilities. Therefore, the proposed project would have a less than significant impact on government facilities.

Impact C-PS-1: The proposed project in combination with past, present, and reasonably foreseeable future projects in the vicinity, would result in less-than-significant cumulative impacts to public services. (Less than Significant)

Like other development in the vicinity, the proposed project would be expected to incrementally increase demand for public services, but not beyond levels anticipated and planned for by public service providers. The proposed project, in combination with other past, present, and reasonably foreseeable future projects, would not result in a cumulatively considerable public services impact.

<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>
13. BIOLOGICAL RESOURCES— Would the project:					
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<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 checked="" type="checkbox"/>	<input type="checkbox"/>
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

<u>Topics:</u>	<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>
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 not located within an adopted Habitat Conservation Plan area, Natural Community Conservation Plan area, or other approved local, regional, or state habitat conservation plan area. Therefore, Topic 13f is not applicable.

Impact BI-1: The proposed project would not have a substantial adverse effect, either directly or through habitat modifications, on any special-status species. (No Impact)

The project site contains an existing building and impermeable surfaces covering the entire land area. Six street trees are present adjacent to the project site: two on the Embarcadero frontage and four on the Steuart Street frontage. No special-status species are known to exist at the project site.

The proposed project would add a third story to the existing vacant building at the project site and rehabilitate it for office and assembly uses. The four street trees along the project site’s Steuart Street frontage would be removed and replaced with new trees during construction, pursuant to DPW review and approval. The project site does not provide habitat for any rare or endangered plant or animal species, and the proposed project would not affect or diminish plant or animal habitats. The project would not interfere with any resident or migratory species, or affect any rare, threatened or endangered species. Therefore, the proposed project would have no impact on special-status species.

Impact BI-2: The proposed project would not impact any sensitive natural communities or adversely affect any federally-protected wetlands. (No Impact)

The project site does not contain riparian habitat or other sensitive natural communities or a federally-protected wetland. No impact would occur.

Impact BI-3: The proposed project would not interfere with the movement of native resident or wildlife species or with established native resident or migratory wildlife corridors. (Less than Significant)

Structures in an urban setting may present risks for birds’ migratory paths from their location and/or their features. The City has adopted guidelines to describe the issue and provide regulations for bird-safe design within the City.⁵⁵ The regulations establish

⁵⁵ San Francisco Planning Department, “Standards for Bird-Safe Buildings.” Website provides the adopted *Standards for Bird-Safe Buildings* adopted by the Planning Commission, July 14, 2011 and Ordinance No.

bird-safe standards for new building construction, additions to existing buildings, and replacement facades to reduce bird mortality from circumstances that are known to pose a high risk to birds and are considered to be “bird hazards.” The two circumstances regulated are: 1) location-related hazards, where the siting of a structure creates increased risk to birds (defined as inside or within 300 feet of open spaces two acres and larger dominated by vegetation or open water) and 2) feature-related hazards, which may create increased risk to birds regardless of where the structure is located. For new building construction located where the location-related standard would apply, the standards include façade requirements consisting of no more than 10 percent untreated glazing and the use of minimal lighting. Lighting that is used shall be shielded without any uplighting. Feature-related hazards include free-standing glass walls, wind barriers, skywalks, balconies, and greenhouses on rooftops that have unbroken glazed segments 24 sf and larger in size. Any structure that contains these elements shall treat 100 percent of the glazing.

The project site consists of an existing building and impermeable surfaces covering the entire land area, across the street from San Francisco Bay. Therefore, the project site is located in an area where the standards for location-related hazards apply. Because the proposed project would be subject to and would comply with City adopted regulations for bird-safe buildings, the proposed project would not interfere with the movement of native resident or wildlife species or with established native resident or migratory wildlife corridors. Migrating birds do pass through San Francisco, but the project site and the adjacent street trees are unlikely to contain habitat to support migrating birds. Nesting birds, their nests, and eggs are fully protected by the California Fish and Game Code (Sections 3503 and 3503.5) and the federal Migratory Bird Treaty Act (MBTA). The proposed project would be subject to the MBTA, and would therefore have a less-than-significant impact on nesting birds.

Impact BI-4: 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)

The San Francisco Board of Supervisors adopted legislation that amended the City’s Urban Forestry Ordinance, Public Works Code Section 801 et. Seq., to require a permit from DPW to remove any protected trees.⁵⁶ If any activity is to occur within the dripline, prior to building permit issuance, a tree protection plan prepared by an International Society of Arborists-certified arborist is to be submitted to the Planning Department for review and approval. All permit applications that could potentially

199-11, adopted by the Board of Supervisors, October 7, 2011. Available online at: <http://www.sf-planning.org/index.aspx?page=2506>. Accessed May 14, 2014.

⁵⁶ “Required Checklist for Tree Planting and Protection, 110 The Embarcadero/115 Steuart Street,” December 12, 2013. This document is available for review at 1650 Mission Street, 4th Floor, as part of Case No. 2011.1388E.

impact a protected tree must include a Planning Department “Required Checklist for Tree Planting and Protection.” Protected trees include landmark trees, significant trees, or streets trees located on private or public property anywhere within the territorial limits of the City and County of San Francisco. Article 16 of the San Francisco Public Works Code, the Urban Forestry Ordinance, provides for the protection of landmark, significant, and street trees. Landmark trees are designated by the Board of Supervisors upon the recommendation of the Urban Forestry Council, which determines whether a nominated tree meets the qualification for landmark designations by using establish criteria (Section 810). Significant trees are those trees within the jurisdiction of the DPW or trees on private property within 10 feet of the public right-of-way that meet any of three size criteria. Significant trees must have a diameter at breast height in excess of 12 inches, or a height in excess of 20 feet, or a canopy in excess of 15 feet (Section 810(A)(a)). Street trees are any tree growing within the public right-of-way, including unimproved public streets and sidewalks, and any tree growing on land under the jurisdiction of the DPW (Section 802(w)). If a project would result in tree removal subject to the Urban Forestry Ordinance and the DPW would grant a permit, the DPW shall require that replacement trees be planted (at a one-to-one ratio) by the project sponsor or that an in-lieu fee be paid by the project sponsor (Section 806(b)).

As noted in the Required Checklist for Tree Planting and Protection prepared for the proposed project⁵⁷, the four trees along the project site’s Steuart Street frontage would be temporarily removed and replaced with new trees during construction, pursuant to DPW review and approval. Construction would last approximately 14 months. The two trees along the Embarcadero frontage would not be removed, and would be protected in place during construction.

Impact C-BI-1: The proposed project would result in no impact to biological resources; therefore, a discussion of cumulative impacts is not necessary. (Less than Significant)

Cumulative projects, including the nearby project proposed at 75 Howard Street, would be required to comply with the City’s Urban Forestry Ordinance and apply for a tree removal permit from the Department of Public Works (including requirements for tree replacement or in-lieu fees) if these projects propose tree removal. As such, it is unlikely that these cumulative projects would have biological impacts that could combine with the less-than-significant biological impacts of the proposed project. Further, the proposed project would not substantially contribute to any cumulative biological impact and the proposed project would not result in any significant cumulative biological impacts.

⁵⁷ Ibid.

<u>Topics:</u>	<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. 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 type="checkbox"/>	<input checked="" 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"/>

The project proposed project would not use septic tanks or alternative wastewater disposal systems. Therefore, topic 14e is not applicable.

Impact GE-1: The proposed project would not result in exposure of people and structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, expansive soils, seismic ground-shaking, liquefaction, lateral spreading, or landslides. (Less than Significant)

No portion of the project site is within Alquist-Priolo Earthquake Fault Zone,⁵⁸ and no active or potentially active faults have been mapped on the project site by the California Geological Survey⁵⁹ or the General Plan's October 2012 Community Safety Element (Community Safety Element). However, given the project site's proximity to the San Andreas Fault, approximately 9.2 miles to the southwest of the project site, the Community Safety Element identifies the potential for violent seismic ground shaking at the project site from a magnitude 7.2 earthquake on this fault. The Community Safety Element also projects very strong seismic ground shaking at the project site from a magnitude 6.5 earthquake on the Hayward Fault, approximately 9.5 miles to the northeast of the project site. The project site is located on artificial fill and the Community Safety Element maps it within a liquefaction zone (ground shaking that causes saturated soils to lose strength due to an increase in pore pressure), but not in a landslide zone (movement of a mass of soil down a steep slope when the soil loses strength and can no longer support the weight of overlying soil or rocks). It is likely that the project site would experience periodic minor or major earthquakes associated with a regional fault. The 2008 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. Like the entire San Francisco Bay Area, the project site is subject to groundshaking in the event of an earthquake.

The Geotechnical Report prepared for the proposed project indicates that a foundation with a combination of existing piles and new shear walls would be required. Such foundation would avoid impacts on the foundations of neighboring structures.⁶⁰ The final building foundation plans would be reviewed by DBI. In reviewing building plans, DBI refers to a variety of information sources to determine existing hazards and assess requirements to address these hazards. Sources reviewed include maps of Special Geologic Study Areas and known landslide areas in San Francisco as well as the building inspectors' working knowledge of areas of special geologic concern. Potential geologic hazards would be addressed during the permit review process. To ensure

⁵⁸ California Geological Survey (CGS), Alquist-Priolo Earthquake Fault Zone Maps. Available online at: <http://www.quake.ca.gov/gmaps/WH/regulatorymaps.htm>. Accessed May 14, 2014.

⁵⁹ CGS, 2010 Fault Activity Map of California. Available online at: <http://www.quake.ca.gov/gmaps/FAM/faultactivitymap.html>. Accessed May 14, 2014.

⁶⁰ Treadwell & Rollo, "Geotechnical Investigation and Site Specific Response Spectra, 110 The Embarcadero (113-115 Steuart Street), San Francisco, CA," February 6, 2008; "Geotechnical Review of Structural Documents, Proposed Renovation, 110 The Embarcadero, San Francisco, California," December 17, 2013; and "Clarification – Geotechnical Review Letter dated 17 December 2013," May 19, 2014. These documents are available for review at 1650 Mission Street, 4th Floor, as part of Case No. 2011.1388E.

compliance with all Building Code provisions regarding structure safety, when DBI reviews the geotechnical report and building plans for a proposed project, they will determine the adequacy of necessary engineering and design features. Past geological and geotechnical investigations would be available for use by DBI during its review of building permits for the site. Also, DBI could require that additional site-specific soils report(s) be prepared in conjunction with permit applications, as needed. Therefore, potential damage to structures from geologic hazards on the project site would be avoided through SF DBI's requirement for a geotechnical report and review of the building permit application pursuant to SF DBI implementation of the Building Code, thus this impact would be less than significant.

Impact GE-2: The proposed project would not result in substantial soil erosion or loss of topsoil. (No Impact)

The project site is located on artificial fill in a highly developed urban area, is occupied by an existing building, and is covered entirely by impervious surfaces. Therefore, the proposed project would not result in soil erosion or loss of topsoil. No impact would occur.

Impact GE-3: The proposed project could be located on expansive soil, but would not create substantial risks to life or property. (Less than Significant)

Expansive soils expand and contract in response to changes in soil moisture, most notably when near surface soils change from saturated to a low-moisture content condition, and back again. It is unknown if expansive soils are beneath the project site. However, the proposed project would be subject to and required to comply with recommendations from DBI, through its building permit review process, that would include an analysis of the potential for soil expansion impacts. Therefore, the proposed project would not create substantial risk to life or property from expansive soils and impacts would be less than significant.

Impact GE-4: The proposed project would not change substantially the topography or unique geologic or physical features of the site. (No Impact)

The topography of the project site is relatively flat and there are no notable topographic or unique geologic features present on the site. The entire project site is already developed, and no expansion of the building footprint would occur as a result of the proposed project. As such, no impact would occur.

Impact C-GE-1: The proposed project, in combination with the past, present, and reasonably foreseeable future projects in the site vicinity, would result in a less-than-significant cumulative impacts to geology and soils. (Less than Significant)

Geological impacts are generally site-specific and the proposed project would not have the potential to have cumulative effects with other projects. Cumulative development would be subject to the same DBI design review and safety measures as the proposed project. These measures would render the geologic effects of cumulative projects to less-

than-significant levels. For these reasons, the proposed project, in combination with other past, present, and reasonably foreseeable future projects, would not result in a cumulatively considerable geology and soils impact.

<u>Topics:</u>	<u>Potentially Significant Impact</u>	<u>Less Than Significant with Mitigation Incorporated</u>	<u>Less Than Significant Impact</u>	<u>No Impact</u>	<u>Not Applicable</u>
15. HYDROLOGY AND WATER QUALITY— Would the project:					
a) Violate any water quality standards or waste discharge requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

<u>Topics:</u>	<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>
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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Impact HY-1: The proposed project would not violate water quality standards or waste discharge requirements, substantially degrade water quality, or provide substantial additional sources of polluted runoff. (Less than Significant)

Proposed project-related wastewater would flow to the City’s combined stormwater and sewer system and would be treated to standards contained in the City’s NPDES permit for the Southeast Water Pollution Control Plant prior to discharge into San Francisco Bay. Because the NPDES standards are set and regulated by the RWQCB, the proposed project would not conflict with RWQCB requirements.

Groundwater is relatively shallow throughout the project site, approximately five to ten feet below grade. The proposed project’s excavation could potentially encounter groundwater, which could impact water quality. Groundwater encountered during construction of the proposed project would be subject to requirements of the City’s Sewer Use Ordinance (Ordinance Number 19-92, amended 116-97), as supplemented by Department of Public Works Order No. 158170, requiring a permit from the Wastewater Enterprise Collection System Division of the SFPUC. A permit may be issued only if an effective pretreatment system is maintained and operated. Each permit for such discharge shall contain specified water quality standards and may require the project sponsor to install and maintain meters to measure the volume of the discharge to the combined sewer system. SFPUC may also require water analysis prior to discharge per the City’s Industrial Waste Ordinance (Ordinance number 199-77). In addition, the geotechnical investigation⁶¹ states that dewatering wells may be needed to draw the groundwater down to three feet below the planned depths of excavation to provide for a workable excavation. Any dewatering wells needed for the proposed project would be subject to the requirements of the City’s Soil Boring and Well Regulation Ordinance (Ordinance Number 113-05), requiring a project sponsor to obtain a permit from the Department of Public Health prior to constructing a dewatering well. A permit may be issued only if the project sponsors use construction practices that would prevent the contamination or pollution of groundwater during the construction or modification of the well or soil boring. Also see the Maher Ordinance discussion under Impact HZ-2 below.

⁶¹ Treadwell & Rollo, “Geotechnical Investigation and Site Specific Response Spectra, 110 The Embarcadero (113-115 Steuart Street), San Francisco, CA,” February 6, 2008; “Geotechnical Review of Structural Documents, Proposed Renovation, 110 The Embarcadero, San Francisco, California,” December 17, 2013; and “Clarification – Geotechnical Review Letter dated 17 December 2013,” May 19, 2014. These documents are available for review at 1650 Mission Street, 4th Floor, as part of Case No. 2011.1388E.

During the proposed project's construction, the potential for erosion and transportation of soil particles would exist, but would be limited given that construction would consist of an addition to an existing building on a lot fully covered by impermeable surfaces. Therefore, due to the requirements of the existing regulations and the proposed project's minor amount of exterior construction, the proposed project would not violate water quality standards, substantially degrade water quality, or provide substantial additional sources of polluted runoff. Therefore, water quality impacts due to waste discharge would be less-than-significant.

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)

Groundwater is relatively shallow throughout the project site, approximately five to ten feet below grade. The proposed project's excavation could potentially encounter groundwater, which could impact groundwater supplies. Although dewatering could be required during construction, any effects related to lowering the water table would be temporary and would not be expected to substantially deplete groundwater resources. The proposed project would not require long-term, continuous dewatering following construction. The underground structure would be waterproofed to prevent groundwater seepage and constructed to withstand the hydrostatic pressure of the groundwater. The specifications for construction dewatering, potential groundwater recharge, and protection against long-term groundwater intrusion are outlined in the geotechnical investigation for the proposed project⁶² and will be reviewed by the Department of Building Inspection as part of the building permit process. In addition, the project site is located in the Downtown San Francisco Groundwater Basin.⁶³ This basin is not used as a drinking water supply and no plans for development of this basin exist for groundwater production.⁶⁴

The project site is entirely covered by the existing building and impervious surfaces, and this condition would not change as a result of the proposed project. As such, the proposed project would not change or interfere with existing groundwater supply or recharge. For the above reasons, this impact would be less than significant.

⁶² Ibid.

⁶³ California Department of Water Resources, "San Francisco Bay Hydrologic Region Map." Available online at: http://www.water.ca.gov/groundwater/bulletin118/san_francisco_bay.cfm. Accessed on May 15, 2014.

⁶⁴ San Francisco Planning Department, *Transit Center District Plan and Transit Tower Draft EIR*, September 2011. This document is available for review at the Planning Department in Case File Nos. 2007.0558E and 2008.0789E.

Impact HY-3: The proposed project would not result in altered drainage patterns that would cause substantial erosion or flooding or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems. (Less than Significant)

Development in the City and County of San Francisco must account for flooding potential. Areas located on fill or bay mud can subside to a point at which the sewers do not drain freely during a storm (and sometimes during dry weather) and there can be backups or flooding near these streets and sewers. The proposed project falls within an area in the City prone to flooding during storms, especially where ground stories are located below an elevation of 0.0 City Datum or, more importantly, below the hydraulic grade line or water level of the sewer.

The City has implemented a review process to avoid flooding problems caused by the relative elevation of the structure to the hydraulic grade line in the sewers. Applicants for building permits for either new construction, change of use (Planning) or change of occupancy (Building Inspection), or for major alterations or enlargements are referred to the SFPUC for a determination of whether the project would result in ground-level flooding during storms. The side sewer connection permits for these projects need to be reviewed and approved by the SFPUC at the beginning of the review process for all permit applications submitted to the Planning Department or the Department of Building Inspection. The SFPUC and/or its delegate (DPW, Hydraulics Section) will review the permit application and comment on the proposed application and the potential for flooding during wet weather. The SFPUC will receive and return the application within a two-week period from date of receipt. The permit applicant shall refer to PUC requirements for information required for the review of projects in flood-prone areas. Requirements may include provision of a pump station for the sewage flow, raised elevation of entryways, and/or special sidewalk construction and the provision of deep gutters.

No streams or rivers exist at the project site. Therefore, the proposed project would not alter the course of a stream or river. Furthermore, the proposed project would not substantially alter the existing drainage pattern of the project site or area.

During the proposed project's construction, the potential for erosion and transportation of soil particles would exist, but would be limited given that excavation would occur within the footprint of the existing building. The footprint of the building would not expand as a result of the proposed project. Therefore, due to the requirements of the existing regulations and the proposed project's lack of horizontal building expansion, the proposed project would not violate water quality standards, substantially degrade water quality, or provide substantial additional sources of polluted runoff.

As required, the sponsor for the proposed project would coordinate a review with SFPUC in order to determine if the project would result in ground-level flooding during storms and will incorporate any required design measures, as applicable. Therefore, the proposed project would not result in altered drainage patterns that would cause substantial erosion or flooding or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems and impacts would be less than significant.

Impact HY-4: The proposed project would not expose people, housing, or structures to substantial risk of loss due to flooding. (Less than Significant)

Flood risk assessment and some flood protection projects are conducted by federal agencies including the Federal Emergency Management Agency (FEMA) and the U.S. Army Corps of Engineers. The flood management agencies and cities implement the National Flood Insurance Program (NFIP) under the jurisdiction of FEMA and its Flood Insurance Administration. Currently, the City of San Francisco does not participate in the NFIP and no flood maps are published for the City. However, FEMA is preparing Flood Insurance Rate Maps (FIRMs) for the City and County of San Francisco for the first time. FIRMs identify areas that are subject to inundation during a flood having a 1 percent chance of occurrence in a given year (also known as a "base flood" or "100-year flood"). FEMA refers to the flood plain that is at risk from a flood of this magnitude as a special flood hazard area (SFHA).

FEMA has tentatively identified SFHAs along the City's shoreline in and along the San Francisco Bay consisting of Zone A (in areas subject to inundation by tidal surge) and Zone V (areas of coastal flooding subject to wave hazards). On June 10, 2008, legislation was introduced at the San Francisco Board of Supervisors to enact a floodplain management ordinance to govern new construction and substantial improvements in flood prone areas of San Francisco, and to authorize the City's participation in NFIP upon passage of the ordinance. Specifically, the proposed floodplain management ordinance includes a requirement that any new construction or substantial improvement of structures in a designated flood zone must meet the flood damage minimization requirements in the ordinance. The NFIP regulations allow a local jurisdiction to issue variances to its floodplain management ordinance under certain narrow circumstances, without jeopardizing the local jurisdiction's eligibility in the NFIP. However, the particular projects that are granted variances by the local jurisdiction may be deemed ineligible for federally backed flood insurance by FEMA.

The project site is not located within the mapped 100-year Flood Hazard Boundary⁶⁵ or within a dam failure area.⁶⁶ The building is within an area identified by the SFPUC as a

⁶⁵ Federal Emergency Management Agency, "Draft Special Flood Hazard Areas (San Francisco)," September 21, 2007.

flood prone area, where storm-related flooding of sewers could occur. Through the building permit review process for this project, the SFPUC would require design features necessary to minimize the potential of a sewer backup during storm events as well as to minimize the potential of street storm flow from entering the property. The proposed project would not expand the footprint of the existing building. Aside from addition of elevator shafts, the project also would not expand or deepen the building's basement level. Additionally, the proposed project would not include housing units. Therefore, potential impacts from flooding would be less than significant.

Impact HY-5: The proposed would not expose people or structures to a significant risk of loss, injury, or death involving inundation by seiche, tsunami, or mudflow. (Less than Significant)

The project site is located within a tsunami hazard area.⁶⁷ A seiche is an oscillation of a water body, such as a bay, which may cause local flooding. A seiche could occur on San Francisco Bay due to seismic or atmospheric activity. The project site is approximately 200 feet from San Francisco Bay. The proposed project would involve adding a third floor to an existing building, and would not expose the structure to any additional risk of inundation by seiche or tsunami. No mudslide hazards exist at the project site because the project site is not located near any landslide prone areas.⁶⁸ Therefore, the proposed project would not expose people or structures to a significant risk of loss, injury, or death involving inundation by seiche, tsunami, or mudflow. This impact would be less than significant.

Impact C-HY-1: The proposed project, in combination with the past, present, and reasonably foreseeable future projects in the site vicinity, would result in a less-than-significant cumulative impacts to hydrology and water quality. (Less than Significant)

Cumulative development in the project area could result in intensification of uses and thus a cumulative increase in wastewater generation. The SFPUC has accounted for such growth in its service projections. The cumulative development projects would be required to comply with construction-phase stormwater pollution control and dewatering water quality regulations, if necessary, similar to the proposed project. For these reasons, the proposed project, in combination with other past, present, and reasonably foreseeable future projects, would not result in a cumulatively considerable hydrology and water quality impact.

⁶⁶ City and County of San Francisco, "General Plan, Community Safety Element," June 2012, Map 6.

⁶⁷ *Ibid*, Map 5.

⁶⁸ *Ibid*, Map 4.

<u>Topics:</u>	<u>Potentially Significant Impact</u>	<u>Less Than Significant with Mitigation Incorporated</u>	<u>Less Than Significant Impact</u>	<u>No Impact</u>	<u>Not Applicable</u>
16. HAZARDS AND HAZARDOUS MATERIALS— Would the project:					
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input 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 type="checkbox"/>	<input checked="" 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, topics 16e and 16f are not applicable.

Impact HZ-1: The proposed project would not create a significant hazard through routine transport, use, or disposal of hazardous materials. (Less than Significant)

The proposed project would involve adding a third story to an existing building and rehabilitating it for office and assembly uses. The building would likely contain relatively small amounts of hazardous materials, such as common types of cleaners and disinfectants. 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. Employers are required by law to ensure employee safety by identifying hazardous materials in the workplace, providing safety information to workers who handle hazardous materials, and adequately training workers. For these reasons, hazardous materials used during project operation would not pose any substantial public health or safety hazards related to hazardous materials. Thus, the proposed project would result in less-than-significant impacts related to routine transport, use, or disposal of hazardous materials.

Impact HZ-2: The proposed project would not create a significant hazard to the public or the environment through the release of hazardous materials. (Less than Significant)

Testing documented in the Phase 1 Environmental Site Assessment (ESA)⁶⁹ prepared for the project indicates the presence of low to moderate level contaminants (polynuclear aromatic hydrocarbons (PAH) and arsenic) in the soil, and asbestos and lead paint in the existing building. The presence of these materials could cause a potential health risk due to the proposed excavation and alteration of the building. However, the proposed project would be required to remove the potential hazardous materials in compliance with federal, state and local regulations.

Soil and Groundwater

The proposed project would require excavation of at least 50 cubic yards of soil on a site with known prior manufacturing use. Therefore, the project is subject to Article 22A of the Health Code, also known as the Maher Ordinance, which is administered and overseen by the Department of Public Health (DPH). The Maher Ordinance requires the project sponsor to retain the services of a qualified professional to prepare a Phase I ESA that meets the requirements of Health Code Section 22.A.6. The Phase I would determine the potential for site contamination and level of exposure risk associated with the project. Based on that information, the project sponsor may be required to conduct soil and/or groundwater sampling and analysis. Where such analysis reveals the presence of hazardous substances in excess of state or federal standards, the project sponsor is required to submit a site mitigation plan (SMP) to DPH or other appropriate state or federal agency(ies), and to remediate any site contamination in accordance with an approved SMP prior to the issuance of any building permit. In compliance with the Maher Ordinance, the project sponsor has submitted a Maher Application to DPH and a Phase I ESA has been prepared to assess the potential for site contamination.

⁶⁹ PES Environmental, Inc. "Phase I Environmental Site Assessment, 110 The Embarcadero, San Francisco, California," October 2, 2012. This document is available for review at 1650 Mission Street, 4th Floor, as part of Case No. 2011.1388E.

The proposed project would be required to remediate potential soil and groundwater contamination described above in accordance with Article 22A of the Health Code. Thus, the proposed project would not result in a significant hazard to the public or environment from contaminated soil and groundwater and the proposed project would result in a less than significant impact.

Lead-Based Paint

Lead may cause a range of health effects, from behavioral problems and learning disabilities, to seizures and death. Children six years old and under are most at risk. Work must be conducted in compliance with Section 3425 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 interior or exterior lead-based paint on pre-1979 buildings, structures and properties and on steel structures use work practices that minimize or eliminate the risk of lead contamination of the environment.

Section 3425 contains performance standards, including establishment of containment barriers and identifies prohibited practices that may not be used in disturbance or removal of lead-based paint. Any person performing work subject to Section 3425 shall make all reasonable efforts to prevent migration of lead paint contaminants beyond containment barriers during the course of the work, and any person performing regulated work shall make all reasonable efforts to remove all visible lead paint contaminants from all regulated areas of the property prior to completion of the work.

Section 3425 also includes notification requirements, contents of notice, and requirements for project site signs. Prior to commencement of exterior work that disturbs or removes 100 or more sf or 100 or more linear feet of lead-based paint in total, the responsible party must provide the Director of the DBI with written notice that describes the address and location of the proposed project; the scope and specific location of the work; whether the responsible party has reason to know or presume that lead-based paint is present; the methods and tools for paint disturbance and/or removal; the approximate age of the structure; anticipated job start and completion dates for the work; whether the building is residential or nonresidential; whether it is owner-occupied or rental property; the approximate number of dwelling units, if any; the dates by which the responsible party has 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 Post Sign notifying the public of restricted access to work area, a Notice to Residential Occupants, Availability of Pamphlet related to protection from lead in the home, and Early Commencement of Work (by Owner, Requested by Tenant), and Notice of Lead Contaminated Dust or Soil, if applicable. Section 3425 contains provisions regarding inspection and sampling for compliance by DBI, and enforcement, and describes penalties for non-compliance with the requirements of the ordinance.

The proposed project would be subject to and would comply with the above regulations, therefore, impacts from lead-based paint would be less than significant.

Asbestos-Containing Building Material

People exposed to low levels of asbestos may be at elevated risk of lung cancer and mesothelioma. The risk is proportional to the cumulative inhaled dose (quantity of fibers) and increases with the time since first exposure. Although a number of factors influence the disease-causing potency of any given asbestos (such as fiber length and width, fiber type, and fiber chemistry), all forms are carcinogens. Section 19827.5 of the California Health and Safety Code, adopted January 1, 1991, requires that local agencies not issue alteration permits until an applicant has demonstrated compliance with notification requirements under applicable federal regulations regarding hazardous air pollutants, including asbestos. The BAAQMD is vested by the California legislature with authority to regulate airborne pollutants, including asbestos, through both inspection and law enforcement, and is to be notified ten days in advance of any proposed demolition or asbestos abatement work. The notification must include: (1) the names and addresses of the operations; (2) the names and addresses of persons responsible; and (3) the location and description of the structure to be altered, including size, age, and prior use, and the approximate amount of friable asbestos; (4) scheduled starting and completion dates of asbestos abatement work; (5) nature of the planned work and methods to be employed; (6) procedures to be employed to meet BAAQMD requirements; (7) and the name and location of the waste disposal site to be used. The BAAQMD randomly inspects asbestos removal operations. In addition, the BAAQMD will inspect any removal operation about which a complaint has been received. Any asbestos-containing building 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 the State Occupational Safety and Health Administration must also be notified of asbestos abatement to be carried out. Asbestos abatement contractors must follow State regulations contained in California Code of Regulations, Title 8, Section 1529 and Title 8, Section 341.6 through 341.14 where there is asbestos-related work involving 100 sf or more of asbestos-containing building material. Asbestos removal contractors must be certified as such by the Contractors Licensing Board of the State of California. 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 in Sacramento. 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 notice requirements described above. The proposed project would be subject to and would

comply with the above regulations, therefore, impacts from asbestos-containing building material would be less than significant.

Conclusions

With the existing regulations in place, the proposed rehabilitation and vertical expansion of the existing building would not have the potential to pose a direct (through material removal) or indirect (through transport of materials or accidental release) public health hazard to the surrounding neighborhood. Compliance with existing regulatory requirements, and permits would ensure that the proposed project would not result in significant effects due to hazardous materials or wastes. Therefore, the proposed project would have less-than-significant impacts related to hazardous materials use.

Impact HZ-3: The project site is not included on a list of hazardous materials sites compiled pursuant to California Government Code Section 65962.5. (No Impact)

The Phase I ESA submitted for the proposed project included a search of environmental databases covered by California Government Code Section 65962.5. The project site was not listed on any of the environmental databases searched⁷⁰. As such, no impact related to hazardous material sites would occur.

Impact HZ-4: The proposed project would not expose people or structures to a significant risk of loss, injury, or death involving fires, nor interfere with the implementation of an emergency response plan. (Less than Significant)

San Francisco ensures fire safety primarily through provisions of the *Building* and the *Fire Codes*. In addition, the San Francisco Fire Department (as well as DBI) reviews the final building plans to ensure conformance with these provisions. In addition, the proposed project is not located within a fire hazard severity zone.⁷¹ The proposed project would conform to these standards, which (depending on building type) may also include development of an emergency procedure manual and an exit drill plan. Therefore, potential emergency response and fire hazard impacts of the proposed project would be less-than-significant.

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 impacts related to hazards and hazardous materials. (Less than Significant)

Impacts from hazards are generally site-specific, and typically do not result in cumulative impacts. The proposed project would not have a significant impact due to hazardous material conditions on the project site or vicinity. There are no other existing,

⁷⁰ Ibid.

⁷¹ California Department of Forestry and Fire Protection (CalFire), "Draft Fire Hazard Severity Areas in LRA, San Francisco (Map)," September 17, 2007. Available online at: http://www.fire.ca.gov/fire_prevention/fhsz_maps_sanfrancisco.php. Accessed May 21, 2014.

proposed, or foreseeable developments in the project vicinity that would contribute considerably to cumulative effects. For these reasons, the proposed project, in combination with other past, present, and reasonably foreseeable future projects, would not result in a cumulatively considerable hazards and hazardous materials impact.

<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. 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 San Francisco, including the project site, is designated Mineral Resource Zone 4 (MRZ-4) by the California Division of Mines and Geology (CDMG) under the Surface Mining and Reclamation Act of 1975.⁷² This designation indicates that there is inadequate information available for assignment to any other MRZ and thus the project site is not designated area of significant mineral deposits. No operational mineral resource recovery sites exist in the project area whose operations or accessibility would be affected by the proposed project. Therefore, topics 17a and 17b are not applicable to the proposed project.

Impact ME-1: Implementation of 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)

Alterations to existing buildings in San Francisco are required to conform to green building (including fuel, water, and energy conservation) standards specified by Title 24 of the California Code of Regulations. Documentation showing compliance with these standards is submitted with the application for the building permit. Title 24 is enforced by DBI. Therefore, the proposed project would not cause a wasteful use of fuel, energy, or water and the effects related to such consumption would not be significant.

⁷² California Division of Mines and Geology, Open File Report 96-03 and Special Report 146 Parts 1 and II)

Impact C-ME-1: The proposed project, in combination with the past, present, and reasonably foreseeable future projects in the site vicinity, would result in less-than-significant cumulative impacts to energy and minerals. (Less than Significant)

No known minerals exist at the project site and thus, the proposed project would not contribute to any cumulative impact on mineral resources. The project-generated demand for electricity would be negligible in the context of overall demand within San Francisco, the greater Bay Area, and the State, and would not in and of itself require any expansion of power facilities. The City plans to reduce GHG emissions to 25 percent below 1990 levels by the year 2017 and ultimately reduce GHG emission to 80 percent below 1990 levels by 2050 which would be achieved through a number of different strategies, including energy efficiency. Therefore, the energy demand associated with the proposed project would not substantially contribute to a cumulative impact on existing or proposed energy supplies or resources. For these reasons, the proposed project, in combination with other past, present, and reasonably foreseeable future projects, would not result in a cumulatively considerable mineral and energy resources impact.

<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. 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"/>

<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>
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"/>

Impact AF-1: The proposed project would not result in the conversion of farmland or forest lands to non-farm or non-forest use, nor would it conflict with existing agricultural or forest use or zoning. (Not Applicable)

The project site is located within an urban area in the City and County of San Francisco. The California Department of Conservation’s Farmland Mapping and Monitoring Program identifies the site as Urban and Built-Up Land, which is defined as “... land [that] is used for residential, industrial, commercial, institutional, public administrative purposes, railroad and other transportation yards, cemeteries, airports, golf courses, sanitary landfills, sewage treatment, water control structures, and other developed purposes.” Because the project site does not contain agricultural uses and is not zoned for such uses, the proposed project would not convert any prime farmland, unique farmland, or Farmland of Statewide Importance to non-agricultural use, and it would not conflict with existing zoning for agricultural land or a Williamson Act contract, nor would it involve any changes to the environment that could result in the conversion of farmland or conversion of forest land to non-forest use. Therefore, topics 18a, 18b, 18c, 18d, and 18e 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>
19. 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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

<u>Topics:</u>	<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>
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 type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

The foregoing analysis identifies potentially significant impacts to archeological resources and air quality, which would all be mitigated through implementation of mitigation measures as described in this section. Mitigation measures are discussed in greater detail in Section F below.

- a. As discussed in Topic E.4 (Cultural and Paleontological Resources), it is possible that below-ground archeological resources may be present. Any potential adverse effect to CEQA-significant archeological resources resulting from soils disturbance from the proposed project would be reduced to a less-than-significant level by implementation of Mitigation Measure M-CP-2 (Archeological Monitoring Program), described in Section F of this Initial Study. Accordingly, the proposed project would not result in a significant impact on archeological resources through the elimination of examples of major periods of California history or prehistory.
- b. As discussed in Topic E.7, the proposed project, in combination with other past, present, and reasonably foreseeable future projects, would potentially have a cumulatively considerable air quality impact due to the addition of vehicle trips and construction activity in an area that already experiences poor air quality. With implementation of Mitigation Measure M-AQ-2 (Construction Emissions Minimization), the project’s contribution to cumulative air quality impacts would be reduced to a less-than-significant level. The proposed project would not result in any other cumulatively considerable impacts, as discussed in the preceding environmental topics in Section E of this Initial Study. Therefore, the proposed project would not result in significant cumulative impacts.
- c. As discussed in Topic E.7, the proposed project would have potential construction-related air quality impacts on nearby sensitive receptors due to equipment emissions. Mitigation Measure M-AQ-2 (Construction Emissions Minimization), described in Section F below, would reduce this impact to a less-than-significant level. Therefore, the proposed project would not result in a significant air quality impact.

F. MITIGATION MEASURES AND IMPROVEMENT MEASURES

The following mitigation measures have been adopted by the project sponsor and are necessary to reduce the potentially significant environmental impacts of the proposed project to less-than-significant levels. Improvement measures have also been adopted by the project sponsor to further reduce less-than-significant impacts.⁷³

Mitigation Measure M-CP-2: Archeological Monitoring Program

Based on the reasonable potential that archeological resources may be present within the project site, the following measures shall be undertaken to avoid any potentially significant adverse effect from the proposed project on buried or submerged historical resources. The project sponsor shall retain the services of an archaeological consultant from the rotational Department Qualified Archaeological Consultants List (QACL) maintained by the Planning Department archaeologist. The project sponsor shall contact the Department archeologist to obtain the names and contact information for the next three archeological consultants on the QACL. The archeological consultant shall undertake an archeological monitoring program. All plans and reports prepared by the consultant as specified herein shall be submitted first and directly to the ERO for review and comment, and shall be considered draft reports subject to revision until final approval by the ERO. Archeological monitoring and/or data recovery programs required by this measure could suspend construction of the project for up to a maximum of four weeks. At the direction of the ERO, the suspension of *construction* can be extended beyond four weeks only if such a suspension is the only feasible means to reduce to a less than significant level potential effects on a significant archeological resource as defined in CEQA Guidelines Sect. 15064.5 (a)(c).

Consultation with Descendant Communities: On discovery of an archeological site⁷⁴ associated with descendant Native Americans or the Overseas Chinese an appropriate representative⁷⁵ of the descendant group and the ERO shall be contacted. The representative of the descendant group shall be given the opportunity to monitor

⁷³ *Agreement to Implement Mitigation and Improvement Measures – 110 The Embarcadero/115 Steuart Street*, June, 17, 2014. This document is available for review at 1650 Mission Street, 4th Floor, as part of Case No. 2011.1388E.

⁷⁴ By the term “archeological site” is intended here to minimally include any archeological deposit, feature, burial, or evidence of burial.

⁷⁵ An “appropriate representative” of the descendant group is here defined to mean, in the case of Native Americans, any individual listed in the current Native American Contact List for the City and County of San Francisco maintained by the California Native American Heritage Commission and in the case of the Overseas Chinese, the Chinese Historical Society of America.

archeological field investigations of the site and to consult with ERO regarding appropriate archeological treatment of the site, of recovered data from the site, and, if applicable, any interpretative treatment of the associated archeological site. A copy of the Final Archaeological Resources Report shall be provided to the representative of the descendant group.

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

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

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

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

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

The scope of the ADRP shall include the following elements:

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

Human Remains, Associated or Unassociated Funerary Objects. The treatment of human remains and of associated or unassociated funerary objects discovered during any soils disturbing activity shall comply with applicable State and Federal Laws, including immediate notification of the Coroner of the City and County of San Francisco and in the event of the Coroner's determination that the human remains are Native American remains, notification of the California State Native American Heritage Commission (NAHC) who shall appoint a Most Likely Descendant (MLD) (Pub. Res. Code Sec. 5097.98). The archeological consultant, project sponsor, ERO, and MLD shall make all reasonable efforts to develop an agreement for the treatment of, with appropriate dignity, human remains and associated or unassociated funerary objects (CEQA Guidelines. Sec. 15064.5(d)). The agreement should take into consideration the appropriate excavation, removal, recordation, analysis, curation, possession, and final disposition of the human remains and associated or unassociated funerary objects.

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

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

Mitigation Measure M-AQ-2: Construction Emissions Minimization

- A. *Construction Emissions Minimization Plan.* Prior to issuance of a construction permit, the project sponsor shall submit a Construction Emissions Minimization Plan (Plan) to the Environmental Review Officer (ERO) for review and approval by an Environmental Planning Air Quality Specialist. The Plan shall detail project compliance with the following requirements:

1. All off-road equipment greater than 25 hp and operating for more than 20 total hours over the entire duration of construction activities shall meet the following requirements:
 - a) Where access to alternative sources of power are available, portable diesel engines shall be prohibited;
 - b) All off-road equipment shall have:
 - i. Engines that meet or exceed either U.S. Environmental Protection Agency (USEPA) or California Air Resources Board (ARB) Tier 2 off-road emission standards, and
 - ii. Engines that are retrofitted with an ARB Level 3 Verified Diesel Emissions Control Strategy (VDECS).⁷⁶
 - c) Exceptions:
 - i. Exceptions to A(1)(a) may be granted if the project sponsor has submitted information providing evidence to the satisfaction of the ERO that an alternative source of power is limited or infeasible at the project site and that the requirements of this exception provision apply. Under this circumstance, the sponsor shall submit documentation of compliance with A(1)(b) for onsite power generation.
 - ii. Exceptions to A(1)(b)(ii) *may* be granted if the project sponsor has submitted information providing evidence to the satisfaction of the ERO that a particular piece of off-road equipment with an ARB Level 3 VDECS is: (1) technically not feasible, (2) would not produce desired emissions reductions due to expected operating modes, (3) installing the control device would create a safety hazard or impaired visibility for the operator, or (4) there is a compelling emergency need to use off-road equipment that are not retrofitted with an ARB Level 3 VDECS and the sponsor has submitted documentation to the ERO that the requirements of this exception provision apply. If granted an exception to A(1)(b)(ii), the project sponsor must comply with the requirements of A(1)(c)(iii).

⁷⁶ Equipment with engines meeting Tier 4 Interim or Tier 4 Final emission standards automatically meet this requirement, therefore a VDECS would not be required.

- iii. If an exception is granted pursuant to A(1)(c)(ii), the project sponsor shall provide the next cleanest piece of off-road equipment as provided by the step down schedules in **Table 3**.

Table 3 – Off-Road Equipment Compliance Step-down Schedule

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

How to use the table: If the requirements of (A)(1)(b) cannot be met, then the project sponsor would need to meet Compliance Alternative 1. Should the project sponsor not be able to supply off-road equipment meeting Compliance Alternative 1, then Compliance Alternative 2 would need to be met. Should the project sponsor not be able to supply off-road equipment meeting Compliance Alternative 2, then Compliance Alternative 3 would need to be met.

* Alternative fuels are not a VDECS.

- 2. The project sponsor shall require the idling time for off-road and on-road equipment be limited to no more than two minutes, except as provided in exceptions to the applicable state regulations regarding idling for off-road and on-road equipment. Legible and visible signs shall be posted in multiple languages (English, Spanish, Chinese) in designated queuing areas and at the construction site to remind operators of the two minute idling limit.
- 3. The project sponsor shall require that construction operators properly maintain and tune equipment in accordance with manufacturer specifications.
- 4. The Plan shall include estimates of the construction timeline by phase with a description of each piece of off-road equipment required for every construction phase. Off-road equipment descriptions and information may include, but is not limited to: equipment type, equipment manufacturer, equipment identification number, engine model year, engine certification (Tier rating), horsepower, engine serial number, and expected fuel usage and hours of operation. For VDECS installed: technology type, serial number, make, model, manufacturer, ARB verification number level, and installation date and hour meter reading on installation date. For off-road equipment using alternative fuels, reporting shall indicate the type of alternative fuel being used.

5. The Plan shall be kept on-site and available for review by any persons requesting it and a legible sign shall be posted at the perimeter of the construction site indicating to the public the basic requirements of the Plan and a way to request a copy of the Plan. The project sponsor shall provide copies of Plan to members of the public as requested.
- B. *Reporting.* Quarterly reports shall be submitted to the ERO indicating the construction phase and off-road equipment information used during each phase including the information required in A(4). In addition, for off-road equipment using alternative fuels, reporting shall include the actual amount of alternative fuel used.

Within six months of the completion of construction activities, the project sponsor shall submit to the ERO a final report summarizing construction activities. The final report shall indicate the start and end dates and duration of each construction phase. For each phase, the report shall include detailed information required in A(4). In addition, for off-road equipment using alternative fuels, reporting shall include the actual amount of alternative fuel used.

- C. *Certification Statement and On-site Requirements.* Prior to the commencement of construction activities, the project sponsor must certify (1) compliance with the Plan, and (2) all applicable requirements of the Plan have been incorporated into contract specifications.

Improvement Measure IM-TR-1a: Transportation Demand Management Program

The Proposed Project shall provide at least ten (10) secured bicycle storage locations in the basement for the employees to promote other modes of transportation. In addition, the project sponsor shall implement a Transportation Demand Management (TDM) Program for both employees and visitors that seeks to annually reduce the number of single occupancy vehicle (SOV) trips to and from the project site and encourage persons arriving/departing via alternative modes of transportation (e.g., walking, bicycling, transit). The project sponsor shall designate one or more TDM program managers/contacts, and provide training for these positions. Commonwealth Club shall document and make available upon request, biannually (every two years) monitoring reports, starting one year after certificate of occupancy for the building (baseline year), for review by the City, including the Planning Department. The biannual monitoring reports should include travel demand surveys (i.e., travel demand analysis information requested in the SF Guidelines⁷⁷) of employees and visitors arriving and leaving the building for up to seven days of the reporting period. Generally, the TDM program shall be considered effective if in two consecutive reporting periods that there is a 10

⁷⁷ City and County of San Francisco, Transportation Impact Analysis Guidelines for Environmental Review, October 2002, Chapter 3, Section 3.

percent reduction⁷⁸ in SOV trips to and from the project site from the baseline year. The project sponsor shall consider and include some or all of the following TDM measures:

- Provide ongoing local and regional transportation information (e.g., transit maps and schedules, maps of bicycle routes, internet links) for new and existing employees and patrons, including providing a transportation insert for the invitation packet that would provide information on transit service (Muni and BART lines, schedules and fares), car- and bike-share information, information on where transit passes could be purchased, and information on the 511 Regional Rideshare Program.
- Continue to participate in the Muni FastPass (loaded onto a Clipper card) program as part of the Commonwealth Club employee benefits package.
- Provide information on transportation options, including updates and a “ride board” through which employees and patrons can offer/request rides, on the website and/or lobby bulletin board.
- Encourage the use of bicycles by increasing the number of on-site and potentially on-street bicycle racks making them convenient and easy to use. Provide clear points of access to bicycle parking and storage through elevators and/or on the ground floor, and ensure signage indicates the location of these facilities (if public).
- Consider providing discounted bike share membership passes for employees as part of the Commonwealth Club employee benefits package.
- Promote the nearby bike share stations as part of travel information, providing links to additional information on use and membership.
- Similarly, provide information regarding local car share programs.

Improvement Measure IM-TR-1b: Construction Deliveries

To further minimize the construction-related disruption of the general traffic flow on adjacent streets during the AM and PM peak periods, truck movements and deliveries shall be restricted to off-peak hours (generally outside of 7 AM to 9 AM and 4 PM to 6 PM on weekdays, but restrictions may include other times during Giants game days), or other times, as determined by SFMTA and its Transportation Advisory Staff Committee (TASC).

⁷⁸ The 10 percent reduction aligns with the reduction required between 2010 and 2018 for the San Francisco Municipal Transportation Agency to meet their 50 percent private automobile mode share goal outlined in the Strategic Plan, Fiscal year 2013 – Fiscal Year 2018.

Improvement Measure IM-TR-1c: Construction Management Plan – Additional Actions

The project sponsor shall be required to develop and implement a Construction Management Plan (CMP), addressing transportation-related circulation, access, staging, and potential lane and sidewalk closures. In addition to these requirements, the project sponsor shall consider implementing the following measures as part of the CMP:

Construction and Transit Access for Construction Workers – to minimize parking demand and vehicle trips associated with construction workers, include methods to encourage carpooling and transit use to the project site by construction workers.

- Project Construction Coordination and Updates for Adjacent Businesses, the Public and Residents: The project sponsor shall be required to consult with surrounding community members, including business and property owners near the project site to assist coordination of construction traffic management strategies as they relate to the needs of those adjacent to the project site. The project sponsor shall develop a public information plan to provide adjacent residents and businesses with regularly-updated information and a construction-management contact person who shall provide information on project construction activities and schedule, peak construction vehicle activities (e.g. concrete pours), travel detours or other lane closures.

G. PUBLIC NOTICE AND COMMENT

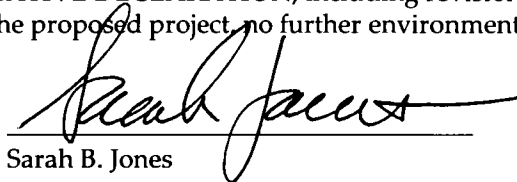
A “Notification of Project Receiving Environmental Review” was mailed on January 13, 2014 to owners of properties within 300 feet of the project site, adjacent occupants, and community organizations. One commenter expressed concern regarding recognition of the building as a historic resource, and the potential effects of adding a third story and roof deck. Analysis done to support this Initial Study finds that the subject building is a historic resource.⁷⁹ The project sponsor, in consultation with Planning Department preservation staff, has included a setback and other context-sensitive design features in the proposed project to preserve the Steuart Street façade and ensure that the project would not have significant impacts on the historic building. Other responses to the notice included requests to receive the environmental document upon completion and requests to view public records.

⁷⁹ San Francisco Planning Department, *Historic Resource Evaluation Response, 110 Embarcadero/113-115 Steuart Street*, Case No. 2011.1388E December 13, 2013. This report is available for review at 1650 Mission Street, 4th Floor, as part of Case No. 2011.1388E.

H. 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.



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

DATE June 25, 2014

I. INITIAL STUDY PREPARERS

Planning Department, City and County of San Francisco
Environmental Planning Division
1650 Mission Street, Suite 400
San Francisco, CA 94103

Environmental Review Officer: Sarah B. Jones
Senior Environmental Planner: Rick Cooper
Environmental and Transportation Planner: Kansai Uchida
Preservation Planner: Gretchen Hilyard
Archeologist: Allison Vanderslice

MITIGATION MONITORING AND REPORTING PROGRAM (Includes Text for Mitigation and Improvement Measures Agreed to by the Project Sponsor)				
	Responsibility for Implementation	Schedule	Monitoring/Report Responsibility	Status/Date Completed
MITIGATION MEASURES				
<i>Cultural and Paleontological Resources</i>				
<p>M-CP-2: Archeological Monitoring Program. Based on the reasonable potential that archeological resources may be present within the project site, the following measures shall be undertaken to avoid any potentially significant adverse effect from the proposed project on buried or submerged historical resources. The project sponsor shall retain the services of an archaeological consultant from the rotational Department Qualified Archaeological Consultants List (QACL) maintained by the Planning Department archaeologist. The project sponsor shall contact the Department archeologist to obtain the names and contact information for the next three archeological consultants on the QACL. The archeological consultant shall undertake an archeological monitoring program. All plans and reports prepared by the consultant as specified herein shall be submitted first and directly to the ERO for review and comment, and shall be considered draft reports subject to revision until final approval by the ERO. Archeological monitoring and/or data recovery programs required by this measure could suspend construction of the project for up to a maximum of four weeks. At the direction of the ERO, the suspension of <i>construction</i> can be extended beyond four weeks only if such a suspension is the only feasible means to reduce to a less than significant level potential effects on a significant archeological resource as defined in CEQA Guidelines Sect. 15064.5 (a)(c).</p> <p><i>Consultation with Descendant Communities:</i> On discovery of an archeological site¹ associated with descendant Native Americans or the Overseas Chinese an appropriate representative² of the descendant group and the ERO shall be contacted. The representative of the descendant group shall be given the opportunity to monitor archeological field investigations of the site and to consult with ERO regarding appropriate archeological treatment of the site, of recovered data from the site, and, if applicable, any interpretative treatment of the associated archeological site. A copy of the Final Archaeological Resources Report shall be provided to the representative of the descendant group.</p> <p><i>Archeological monitoring program (AMP).</i> The archeological monitoring program shall minimally include the following provisions:</p> <ul style="list-style-type: none"> ▪ The archeological consultant, project sponsor, and ERO shall meet and consult on the scope of the AMP reasonably prior to any project-related soils disturbing activities commencing. The ERO in consultation with the project archeologist shall determine what project activities shall be archeologically monitored. In most cases, any soils disturbing activities, such as demolition, foundation removal, 	Project sponsor	AMP development to occur prior to any project-related soils disturbing activities. Monitoring to occur during soils disturbing activities as specified in AMP.	Planning Department to review and approve AMP	As specified in AMP

¹ By the term “archeological site” is intended here to minimally include any archeological deposit, feature, burial, or evidence of burial.

² An “appropriate representative” of the descendant group is here defined to mean, in the case of Native Americans, any individual listed in the current Native American Contact List for the City and County of San Francisco maintained by the California Native American Heritage Commission and in the case of the Overseas Chinese, the Chinese Historical Society of America.

MITIGATION MONITORING AND REPORTING PROGRAM (Includes Text for Mitigation and Improvement Measures Agreed to by the Project Sponsor)				
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<p>excavation, grading, utilities installation, foundation work, driving of piles (foundation, shoring, etc.), site remediation, etc., shall require archeological monitoring because of the potential risk these activities pose to archaeological resources and to their depositional context;</p> <ul style="list-style-type: none"> ▪ The archeological consultant shall advise all project contractors to be on the alert for evidence of the presence of the expected resource(s), of how to identify the evidence of the expected resource(s), and of the appropriate protocol in the event of apparent discovery of an archeological resource; ▪ The archeological monitor(s) shall be present on the project site according to a schedule agreed upon by the archeological consultant and the ERO until the ERO has, in consultation with the archeological consultant, determined that project construction activities could have no effects on significant archeological deposits; ▪ The archeological monitor shall record and be authorized to collect soil samples and artifactual/ecofactual material as warranted for analysis; ▪ If an intact archeological deposit is encountered, all soils disturbing activities in the vicinity of the deposit shall cease. The archeological monitor shall be empowered to temporarily redirect demolition/excavation/pile driving/construction crews and heavy equipment until the deposit is evaluated. If in the case of pile driving activity (foundation, shoring, etc.), the archeological monitor has cause to believe that the pile driving activity may affect an archeological resource, the pile driving activity shall be terminated until an appropriate evaluation of the resource has been made in consultation with the ERO. The archeological consultant shall immediately notify the ERO of the encountered archeological deposit. The archeological consultant shall, after making a reasonable effort to assess the identity, integrity, and significance of the encountered archeological deposit, present the findings of this assessment to the ERO. <p>If the ERO in consultation with the archeological consultant determines that a significant archeological resource is present and that the resource could be adversely affected by the proposed project, at the discretion of the project sponsor either:</p> <p>A) The proposed project shall be re-designed so as to avoid any adverse effect on the significant archeological resource; or</p> <p>B) An archeological data recovery program shall be implemented, unless the ERO determines that the archeological resource is of greater interpretive than research significance and that interpretive use of the resource is feasible.</p> <p>If an archeological data recovery program is required by the ERO, the archeological data recovery program shall be conducted in accord with an archeological data recovery plan (ADRP). The project archeological consultant, project sponsor, and ERO shall meet and consult on the scope of the ADRP. The archeological consultant shall prepare a draft ADRP that shall be submitted to the ERO for review and approval. The ADRP shall identify how the proposed data recovery program will preserve the significant information the archeological resource is expected to contain. That is, the ADRP will identify what scientific/historical research questions are applicable to the expected resource, what data</p>				

MITIGATION MONITORING AND REPORTING PROGRAM (Includes Text for Mitigation and Improvement Measures Agreed to by the Project Sponsor)				
	Responsibility for Implementation	Schedule	Monitoring/Report Responsibility	Status/Date Completed
<p>classes the resource is expected to possess, and how the expected data classes would address the applicable research questions. Data recovery, in general, should be limited to the portions of the historical property that could be adversely affected by the proposed project. Destructive data recovery methods shall not be applied to portions of the archeological resources if nondestructive methods are practical.</p> <p>The scope of the ADRP shall include the following elements:</p> <ul style="list-style-type: none"> ▪ <i>Field Methods and Procedures.</i> Descriptions of proposed field strategies, procedures, and operations. ▪ <i>Cataloguing and Laboratory Analysis.</i> Description of selected cataloguing system and artifact analysis procedures. ▪ <i>Discard and Deaccession Policy.</i> Description of and rationale for field and post-field discard and deaccession policies. ▪ <i>Interpretive Program.</i> Consideration of an on-site/off-site public interpretive program during the course of the archeological data recovery program. ▪ <i>Security Measures.</i> Recommended security measures to protect the archeological resource from vandalism, looting, and non-intentionally damaging activities. ▪ <i>Final Report.</i> Description of proposed report format and distribution of results. ▪ <i>Curation.</i> Description of the procedures and recommendations for the curation of any recovered data having potential research value, identification of appropriate curation facilities, and a summary of the accession policies of the curation facilities. <p><i>Human Remains, Associated or Unassociated Funerary Objects.</i> The treatment of human remains and of associated or unassociated funerary objects discovered during any soils disturbing activity shall comply with applicable State and Federal Laws, including immediate notification of the Coroner of the City and County of San Francisco and in the event of the Coroner's determination that the human remains are Native American remains, notification of the California State Native American Heritage Commission (NAHC) who shall appoint a Most Likely Descendant (MLD) (Pub. Res. Code Sec. 5097.98). The archeological consultant, project sponsor, ERO, and MLD shall make all reasonable efforts to develop an agreement for the treatment of, with appropriate dignity, human remains and associated or unassociated funerary objects (CEQA Guidelines. Sec. 15064.5(d)). The agreement should take into consideration the appropriate excavation, removal, recordation, analysis, curation, possession, and final disposition of the human remains and associated or unassociated funerary objects.</p> <p><i>Final Archeological Resources Report.</i> The archeological consultant shall submit a Draft Final Archeological Resources Report (FARR) to the ERO that evaluates the historical significance of any discovered archeological resource and describes the archeological and historical research methods employed in the archeological testing/monitoring/data recovery program(s) undertaken. Information that may put at risk any archeological resource shall be provided in a separate removable insert within the draft final report.</p>				

MITIGATION MONITORING AND REPORTING PROGRAM (Includes Text for Mitigation and Improvement Measures Agreed to by the Project Sponsor)				
	Responsibility for Implementation	Schedule	Monitoring/Report Responsibility	Status/Date Completed
<p>Copies of the Draft FARR shall be sent to the ERO for review and approval. Once approved by the ERO copies of the FARR shall be distributed as follows: California Archaeological Site Survey Northwest Information Center (NWIC) shall receive one (1) copy and the ERO shall receive a copy of the transmittal of the FARR to the NWIC. The Environmental Planning division of the Planning Department shall receive one bound, one unbound and one unlocked, searchable PDF copy on CD of the FARR along with copies of any formal site recordation forms (CA DPR 523 series) and/or documentation for nomination to the National Register of Historic Places/California Register of Historical Resources. In instances of high public interest or interpretive value, the ERO may require a different final report content, format, and distribution than that presented above.</p>				
Air Quality				
<p>A. Construction Emissions Minimization Plan. Prior to issuance of a construction permit, the project sponsor shall submit a Construction Emissions Minimization Plan (Plan) to the Environmental Review Officer (ERO) for review and approval by an Environmental Planning Air Quality Specialist. The Plan shall detail project compliance with the following requirements:</p> <ol style="list-style-type: none"> 1. All off-road equipment greater than 25 hp and operating for more than 20 total hours over the entire duration of construction activities shall meet the following requirements: <ol style="list-style-type: none"> a) Where access to alternative sources of power are available, portable diesel engines shall be prohibited; b) All off-road equipment shall have: <ol style="list-style-type: none"> i. Engines that meet or exceed either U.S. Environmental Protection Agency (USEPA) or California Air Resources Board (ARB) Tier 2 off-road emission standards, and ii. Engines that are retrofitted with an ARB Level 3 Verified Diesel Emissions Control Strategy (VDECS). c) Exceptions: <ol style="list-style-type: none"> i. Exceptions to A(1)(a) may be granted if the project sponsor has submitted information providing evidence to the satisfaction of the ERO that an alternative source of power is limited or infeasible at the project site and that the requirements of this exception provision apply. Under this circumstance, the sponsor shall submit documentation of compliance with A(1)(b) for onsite power generation. ii. Exceptions to A(1)(b)(ii) may be granted if the project sponsor has submitted information providing evidence to the satisfaction of the ERO that a particular piece of off-road equipment with an ARB Level 3 VDECS is: (1) technically not feasible, (2) would not produce desired emissions reductions due to expected operating modes, (3) installing the control device would create a safety 	Project sponsor	<p>Plan development to occur prior to issuance of building permit. Monitoring to occur during construction.</p>	<p>Planning Department to review and approve plan. Project sponsor to submit quarterly reports to Planning Department during construction, and final report six (6) months after construction.</p>	As specified in plan

MITIGATION MONITORING AND REPORTING PROGRAM
(Includes Text for Mitigation and Improvement Measures Agreed to by the Project Sponsor)

	Responsibility for Implementation	Schedule	Monitoring/Report Responsibility	Status/Date Completed												
<p>hazard or impaired visibility for the operator, or (4) there is a compelling emergency need to use off-road equipment that are not retrofitted with an ARB Level 3 VDECS and the sponsor has submitted documentation to the ERO that the requirements of this exception provision apply. If granted an exception to A(1)(b)(ii), the project sponsor must comply with the requirements of A(1)(c)(iii). iii. If an exception is granted pursuant to A(1)(c)(ii), the project sponsor shall provide the next cleanest piece of off-road equipment as provided by the step down schedules in Table 3.</p> <p>Table 3 – Off-Road Equipment Compliance Step-down Schedule</p> <table border="1"> <thead> <tr> <th><u>Compliance Alternative</u></th> <th><u>Engine Emission Standard</u></th> <th><u>Emissions Control</u></th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Tier 2</td> <td>ARB Level 2 VDECS</td> </tr> <tr> <td>2</td> <td>Tier 2</td> <td>ARB Level 1 VDECS</td> </tr> <tr> <td>3</td> <td>Tier 2</td> <td>Alternative Fuel*</td> </tr> </tbody> </table> <p><u>How to use the table:</u> If the requirements of (A)(1)(b) cannot be met, then the project sponsor would need to meet Compliance Alternative 1. Should the project sponsor not be able to supply off-road equipment meeting Compliance Alternative 1, then Compliance Alternative 2 would need to be met. Should the project sponsor not be able to supply off-road equipment meeting Compliance Alternative 2, then Compliance Alternative 3 would need to be met. * Alternative fuels are not a VDECS.</p> <p>2. The project sponsor shall require the idling time for off-road and on-road equipment be limited to no more than two minutes, except as provided in exceptions to the applicable state regulations regarding idling for off-road and on-road equipment. Legible and visible signs shall be posted in multiple languages (English, Spanish, Chinese) in designated queuing areas and at the construction site to remind operators of the two minute idling limit. 3. The project sponsor shall require that construction operators properly maintain and tune equipment in accordance with manufacturer specifications. 4. The Plan shall include estimates of the construction timeline by phase with a description of each piece of off-road equipment required for every construction phase. Off-road equipment descriptions and information may include, but is not limited to: equipment type, equipment manufacturer, equipment identification number, engine model year, engine certification (Tier rating), horsepower, engine serial number, and expected fuel usage and hours of operation. For VDECS installed: technology type, serial number, make, model, manufacturer, ARB verification number level, and installation date and hour meter reading on installation date. For off-road equipment using alternative fuels, reporting shall indicate the type of alternative fuel being used. 5. The Plan shall be kept on-site and available for review by any persons requesting it and a legible sign shall be posted at the perimeter of the</p>	<u>Compliance Alternative</u>	<u>Engine Emission Standard</u>	<u>Emissions Control</u>	1	Tier 2	ARB Level 2 VDECS	2	Tier 2	ARB Level 1 VDECS	3	Tier 2	Alternative Fuel*				
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MITIGATION MONITORING AND REPORTING PROGRAM (Includes Text for Mitigation and Improvement Measures Agreed to by the Project Sponsor)				
	Responsibility for Implementation	Schedule	Monitoring/Report Responsibility	Status/Date Completed
<p>construction site indicating to the public the basic requirements of the Plan and a way to request a copy of the Plan. The project sponsor shall provide copies of Plan to members of the public as requested.</p> <p>B. Reporting. Quarterly reports shall be submitted to the ERO indicating the construction phase and off-road equipment information used during each phase including the information required in A(4). In addition, for off-road equipment using alternative fuels, reporting shall include the actual amount of alternative fuel used. Within six months of the completion of construction activities, the project sponsor shall submit to the ERO a final report summarizing construction activities. The final report shall indicate the start and end dates and duration of each construction phase. For each phase, the report shall include detailed information required in A(4). In addition, for off-road equipment using alternative fuels, reporting shall include the actual amount of alternative fuel used.</p> <p>C. Certification Statement and On-site Requirements. Prior to the commencement of construction activities, the project sponsor must certify (1) compliance with the Plan, and (2) all applicable requirements of the Plan have been incorporated into contract specifications.</p>				
IMPROVEMENT MEASURES				
<i>Transportation</i>				
<p>IM-TR-1a – Transportation Demand Management Program. The Proposed Project shall provide at least ten (10) secured bicycle storage locations in the basement for the employees to promote other modes of transportation. In addition, the project sponsor shall implement a Transportation Demand Management (TDM) Program for both employees and visitors that seeks to annually reduce the number of single occupancy vehicle (SOV) trips to and from the project site and encourage persons arriving/departing via alternative modes of transportation (e.g., walking, bicycling, transit). The project sponsor shall designate one or more TDM program managers/contacts, and provide training for these positions. Commonwealth Club shall document and make available upon request, biannually (every two years) monitoring reports, starting one year after certificate of occupancy for the building (baseline year), for review by the City, including the Planning Department. The biannual monitoring reports should include travel demand surveys (i.e., travel demand analysis information requested in the SF Guidelines³) of employees and visitors arriving and leaving the building for up to seven days of the reporting period. Generally, the TDM program shall be considered effective if in two consecutive reporting periods that there is a 10 percent reduction⁴ in SOV trips to and from the project site from the baseline year. The project sponsor shall consider and include some or all of the following TDM measures:</p>	Project sponsor	Prior certificate of occupancy issuance	Project sponsor to submit biannual reports to Planning Department starting one year after certificate of occupancy issuance	Continuous

³ City and County of San Francisco, Transportation Impact Analysis Guidelines for Environmental Review, October 2002, Chapter 3, Section 3.

⁴ The 10 percent reduction aligns with the reduction required between 2010 and 2018 for the San Francisco Municipal Transportation Agency to meet their 50 percent private automobile mode share goal outlined in the Strategic Plan, Fiscal year 2013 – Fiscal Year 2018.

MITIGATION MONITORING AND REPORTING PROGRAM (Includes Text for Mitigation and Improvement Measures Agreed to by the Project Sponsor)				
	Responsibility for Implementation	Schedule	Monitoring/Report Responsibility	Status/Date Completed
<ul style="list-style-type: none"> • Provide ongoing local and regional transportation information (e.g., transit maps and schedules, maps of bicycle routes, internet links) for new and existing employees and patrons, including providing a transportation insert for the invitation packet that would provide information on transit service (Muni and BART lines, schedules and fares), car- and bike-share information, information on where transit passes could be purchased, and information on the 511 Regional Rideshare Program. • Continue to participate in the Muni FastPass (loaded onto a Clipper card) program as part of the Commonwealth Club employee benefits package. • Provide information on transportation options, including updates and a “ride board” through which employees and patrons can offer/request rides, on the website and/or lobby bulletin board. • Encourage the use of bicycles by increasing the number of on-site and potentially on-street bicycle racks making them convenient and easy to use. Provide clear points of access to bicycle parking and storage through elevators and/or on the ground floor, and ensure signage indicates the location of these facilities (if public). • Consider providing discounted bike share membership passes for employees as part of the Commonwealth Club employee benefits package. • Promote the nearby bike share stations as part of travel information, providing links to additional information on use and membership. • Similarly, provide information regarding local car share programs. 				
<p>IM-TR-1b: Construction Deliveries. To further minimize the construction-related disruption of the general traffic flow on adjacent streets during the AM and PM peak periods, truck movements and deliveries shall be restricted to off-peak hours (generally outside of 7 AM to 9 AM and 4 PM to 6 PM on weekdays, but restrictions may include other times during Giants game days), or other times, as determined by SFMTA and its Transportation Advisory Staff Committee (TASC).</p>	Project sponsor	During construction	SFMTA to monitor compliance with TASC restrictions	Continues until completion of construction
<p>IM-TR-1c: Construction Management Plan – Additional Actions. The project sponsor shall be required to develop and implement a Construction Management Plan (CMP), addressing transportation-related circulation, access, staging, and potential lane and sidewalk closures. In addition to these requirements, the project sponsor shall consider implementing the following measures as part of the CMP:</p> <ul style="list-style-type: none"> • Construction and Transit Access for Construction Workers – to minimize parking demand and vehicle trips associated with construction workers, include methods to encourage carpooling and transit use to the project site by construction workers. • Project Construction Coordination and Updates for Adjacent Businesses, the Public and Residents: The project sponsor shall be required to consult with surrounding community members, including business and property owners near the project site to assist coordination of construction traffic management strategies as they relate to the needs of those adjacent to the project site. The project sponsor shall develop a public information plan to provide adjacent residents and businesses with regularly- 	Project Sponsor	Plan development to occur prior to issuance of building permit. Monitoring to occur during construction.	Planning Department to review and approve CMP	Continues until completion of construction

MITIGATION MONITORING AND REPORTING PROGRAM (Includes Text for Mitigation and Improvement Measures Agreed to by the Project Sponsor)				
	Responsibility for Implementation	Schedule	Monitoring/Report Responsibility	Status/Date Completed
updated information and a construction-management contact person who shall provide information on project construction activities and schedule, peak construction vehicle activities (e.g. concrete pours), travel detours or other lane closures.				



SAN FRANCISCO PLANNING DEPARTMENT

Historic Resource Evaluation Response

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

Reception:
415.558.6378

Fax:
415.558.6409

Planning
Information:
415.558.6377

Date December 13, 2013
Case No.: 2011.1388E
Project Address: 110 Embarcadero/113-115 Steuart Street
Zoning: C-3-O (Downtown-Office)
84-X Height and Bulk District
Block/Lot: 3715/002
Staff Contact: Gretchen Hilyard (Preservation Planner)
(415) 575-9109
gretchen.hilyard@sfgov.org

PART I: HISTORIC RESOURCE EVALUATION

Buildings and Property Description

The subject property at 110 Embarcadero/113-115 Steuart Street is located at the southeast corner of Steuart and Mission Streets in the Financial District of San Francisco. The subject property is located on a rectangular-shaped lot measuring approximately 137 ft. x 45 ft. within a C-3-O (Downtown-Office) Zoning District and an 84-X Height and Bulk District. The building fronts the San Francisco waterfront and the Embarcadero to the east.

The subject property contains a two-story commercial building constructed in circa 1910. The building is designed in a 20th-Century Commercial architectural style and notable historic features include: shaped parapet, vertical pilasters dividing the upper story windows, and five-part facade division.

Pre-Existing Historic Rating / Survey

The subject property was documented in a series of reports and findings between 2006 and 2009. The building was determined to be an eligible historic resource by the San Francisco Board of Supervisors in Motion No. M09-62 (March 31, 2009). The Board of Supervisors decision was related to the reversal of the approval of the Mitigated Negative Declaration for a previously proposed project. The motion concluded that there was substantial evidence in the record to conclude that the building retained sufficient historic integrity to convey its significance under California Register Criterion 1 for its association with the 1934 Longshoremen's Strike. The building is considered a "Category A.2" property (Resources listed on adopted local registers, and properties that have been determined to appear or may become eligible, for the California Register) for the purposes of the Planning Department's California Environmental Quality Act (CEQA) review procedures.

Neighborhood Context and Description

According to the Historic Resource Evaluation prepared by Page & Turnbull (dated November 26, 2013), "110 Embarcadero/113-115 Steuart is located on the west side of The Embarcadero between Mission and

Howard Streets. Historically, this area was associated with the development of the waterfront, and housed a variety of maritime uses including piers where ships docked, shipbuilding facilities, lumber yards, hiring halls, taverns and sailors' unions. Today the area features a mixture of residential and commercial uses in a built environment that is widely varied in size, materials and age."¹

1887 Sanborn Fire Insurance maps indicated that the subject property was originally occupied by Pier 7 and a hay barn. Other uses in the vicinity included a coal yard, small boat shops, and large lumber yards. The area was burned in the 1906 Earthquake and Fire and 110 Embarcadero/113-115 Steuart was built as part of the reconstruction effort after the disaster. "Throughout the 1920s and 1930s, the waterfront was the center for shipping and the labor force that supported it. Union halls and businesses catering to sailors were located near the piers.

The immediate vicinity of the subject property, particularly on Steuart Street, was the focal point of the 1934 Waterfront and General Strike and events that occurred on July 5, 1934, known as 'Bloody Thursday'.² A Union Hall was located near the subject property as early as 1900 and the San Francisco chapter of the International Longshoremen's Association (I.L.A.) was headquartered at the subject property at 113 Steuart Street from 1932 to 1934.

CEQA Historical Resource(s) Evaluation

Step A: Significance

Under CEQA section 21084.1, a property qualifies as a historic resource if it is "listed in, or determined to be eligible for listing in, the California Register of Historical Resources." The fact that a resource is not listed in, or determined to be eligible for listing in, the California Register of Historical Resources or not included in a local register of historical resources, shall not preclude a lead agency from determining whether the resource may qualify as a historical resource under CEQA.

Individual	Historic District/Context
<p>Property is individually eligible for inclusion in a California Register under one or more of the following Criteria:</p> <p>Criterion 1 - Event: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Criterion 2 - Persons: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Criterion 3 - Architecture: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Criterion 4 - Info. Potential: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Period of Significance: 1934</p>	<p>Property is located in an eligible California Register Historic District/Context under one or more of the following Criteria:</p> <p>Criterion 1 - Event: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Criterion 2 - Persons: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Criterion 3 - Architecture: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Criterion 4 - Info. Potential: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Period of Significance:</p> <p><input type="checkbox"/> Contributor <input type="checkbox"/> Non-Contributor</p>

¹ Page & Turnbull, "110 The Embarcadero/113-115 Steuart Street: Historic Resource Evaluation-Part II), November 26, 2013: 10.

² *Ibid*, 11.

Based on the information provided in the Historic Resource Evaluation prepared by Page & Turnbull (dated November 26, 2013), previous studies and findings related to the subject property, and information in Planning Department files, Preservation staff finds that the subject building is eligible for inclusion on the California Register as an individual resource under Criterion 1.

Criterion 1: Property is 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.

Based on the information found in the Planning Department files, staff confirms with previous findings that the subject building is eligible for inclusion on the California Register under Criterion 1 for its association with the 1934 Longshoremen's Strike. To be eligible under the event criterion, the building cannot merely be associated with historic events or trends but must have a specific association to be considered significant.

The San Francisco chapter of the International Longshoremen's Association (I.L.A.) was headquartered at the subject property at 113 Steuart Street from 1932 to 1934. The second floor of the subject building contained the union hall of the I.L.A., which was accessed via an entrance from Steuart Street. During the 1934 Longshoremen's Strike, two men were shot on the street outside the I.L.A. union hall entrance on "Bloody Thursday" and their bodies were laid in state at the union hall after the event. The public funeral procession started at the subject property before travelling down Market Street several days after the event. The union hall served as an important gathering place for the sailors before, during, and after the strike and shootings. The I.L.A. Strike in San Francisco set off similar strikes elsewhere, which shut down all Pacific Coast ports and was a significant event in west coast labor history. The subject property is directly associated with the I.L.A., Bloody Thursday, 1934 Longshoremen's Strike and related events and is therefore eligible for listing in the California Register under Criterion 1.

Criterion 2: Property is associated with the lives of persons important in our local, regional or national past.

The original owner of the subject building is unknown. Subsequent owners and occupants include a variety of commercial tenants serving the waterfront uses and none appear to have made a significant contribution to local, state or national history. Therefore, 110 Embarcadero/113-115 Steuart Street is not eligible for listing in the California Register under Criterion 2.

Criterion 3: Property embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master, or possesses high artistic values.

The subject building is a typical reconstruction-era commercial building that was built in the aftermath of the 1906 Earthquake and Fire. The building is a modest example of the 20th-century commercial style and does not possess distinctive character such that it would qualify under Criterion 3. Therefore, 110 Embarcadero/113-115 Steuart Street is not eligible for listing in the California Register under Criterion 3.

Criterion 4: Property yields, or may be likely to yield, information important in prehistory or history.

Based upon a review of information in the Departments records, the subject property is not significant under Criterion 4, which is typically associated with archaeological resources. Furthermore, the subject

property is not likely significant under Criterion 4, since this significance criteria typically applies to rare construction types when involving the built environment. The subject property is not an example of a rare construction type.

Step B: Integrity

To be a resource for the purposes of CEQA, a property must not only be shown to be significant under the California Register of Historical Resources criteria, but it also must have integrity. Integrity is defined as "the authenticity of a property's historic identity, evidenced by the survival of physical characteristics that existed during the property's period of significance." Historic integrity enables a property to illustrate significant aspects of its past. All seven qualities do not need to be present as long the overall sense of past time and place is evident.

The subject property has retained or lacks integrity from the period of significance noted in Step A:

Location:	<input checked="" type="checkbox"/> Retains	<input type="checkbox"/> Lacks	Setting:	<input checked="" type="checkbox"/> Retains	<input type="checkbox"/> Lacks
Association:	<input checked="" type="checkbox"/> Retains	<input type="checkbox"/> Lacks	Feeling:	<input checked="" type="checkbox"/> Retains	<input type="checkbox"/> Lacks
Design:	<input checked="" type="checkbox"/> Retains	<input type="checkbox"/> Lacks	Materials:	<input checked="" type="checkbox"/> Retains	<input type="checkbox"/> Lacks
Workmanship:	<input type="checkbox"/> Retains	<input checked="" type="checkbox"/> Lacks			

Since its initial construction in circa 1910 as a commercial building, many documented and undocumented alterations have occurred to the subject property. Alterations include: insertion of awnings above the second story windows, removal of all original storefront materials on the Embarcadero and Steuart street facades, window replacement, removal of the pressed metal cornice on the Embarcadero façade and other ornamental features.

Since the period of significance in 1934, the subject property has retained its original location next to the Audiffred Building and across from the waterfront. Although the financial district has grown up to the west of the subject property, the area immediately adjacent to the subject property along the Embarcadero is still relatively low in scale and many historic buildings remain from the period of significance such that integrity of location, association, setting and feeling are retained. The form, massing, arrangement and architectural details of the subject building are consistent with utilitarian commercial architecture built during San Francisco's reconstruction period in the early 20th century. The overall massing, scale, window and storefront openings, and parapets remain intact such that integrity of design, materials and feeling are retained.

Due to the removal of the commercial storefronts and ornamental character-defining features, the workmanship of the building has been compromised such that integrity of workmanship is no longer retained.

Overall, the subject property retains sufficient integrity to convey its significance as an individual resource eligible under California Register Criterion 1.

Step C: Character Defining Features

If the subject property has been determined to have significance and retains integrity, please list the character-defining features of the building(s) and/or property. A property must retain the essential physical features that enable it to convey its historic identity in order to avoid significant adverse impacts to the resource. These essential

features are those that define both why a property is significant and when it was significant, and without which a property can no longer be identified as being associated with its significance.

The character-defining features of the subject property include:

Overall:

- Two-story massing and rectangular plan.
- Stucco cladding.

Steuart Street Façade:

- Shaped parapet with coping.
- Fenestration size and pattern of four window openings and one blind center window at the second story.
- Concrete wall panels above the window openings.

Embarcadero Façade:

- Flat parapet.
- Fenestration size and pattern of five window openings at the second story.
- Concrete wall panels above the window openings at the second story.
- Classical Revival ornament, including six Tuscan pilasters between windows at the second story, reed molding (belt course) below the second story, cornice above the second story windows, and medallions above each pilaster.

CEQA Historic Resource Determination

- Historical Resource Present
- Individually-eligible Resource
- Contributor to an eligible Historic District
- Non-contributor to an eligible Historic District
- No Historical Resource Present

PART I: SENIOR PRESERVATION PLANNER REVIEW

Signature: Tina Tam

Date: 1-13-2014

Tina Tam, Senior Preservation Planner

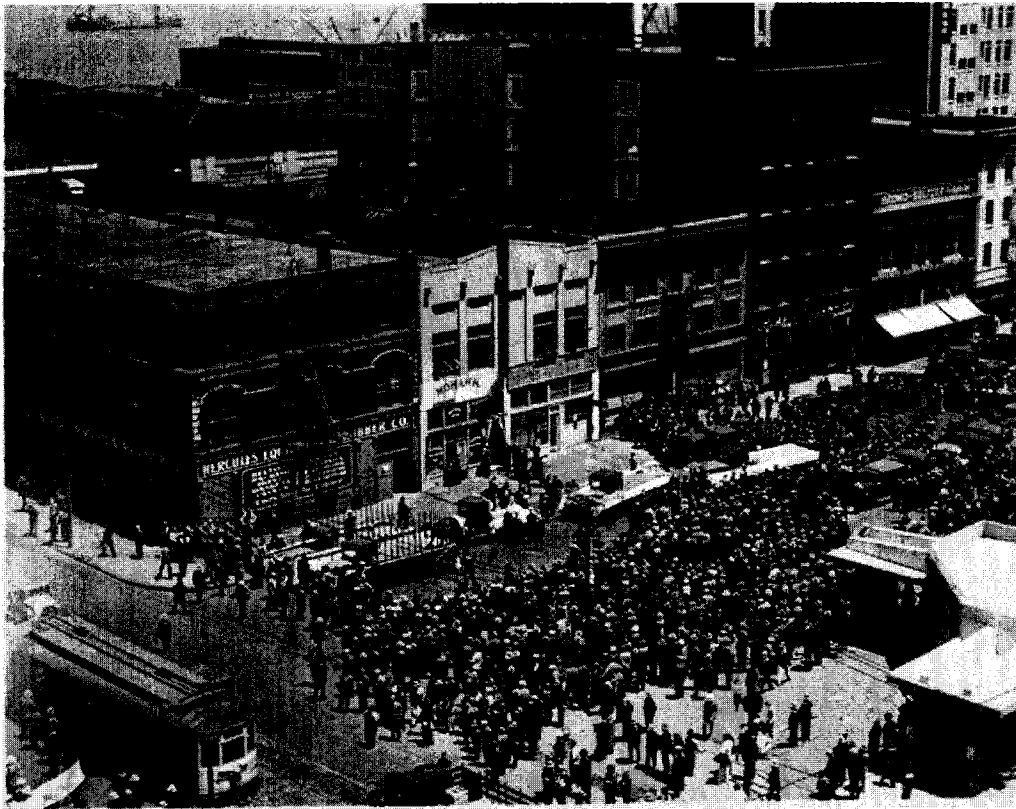
cc: Jeanie Poling, Environmental Planning
Pilar LaValley, Current Planning

GH: G:\Documents\HRER\110 Embarcadero\HRER\110 Embarcadero_HRER Part I.doc

IMAGES



Subject property, view of Steuart Street façade looking northeast.
Source: Leddy, Maytum, Stacy Architects, 2013.



Subject property, view of Steuart Street façade looking northeast, 1934.

Source: Online Archive of California, I0015726A

PART II: PROJECT EVALUATION

PRE-EXISTING HISTORIC RATING / SURVEY

The subject property at 110 Embarcadero/113-115 Steuart Street is located at the southeast corner of Steuart and Mission Streets in the Financial District of San Francisco. The subject property contains a two-story commercial building constructed in circa 1910. The building is designed in a 20th-Century Commercial architectural style. The subject property is not currently listed in any local, state or national historical register.

As stated in the Historic Resource Evaluation Response, Part I (dated December 13, 2013), the Department has determined that the subject property is eligible for inclusion on the California Register as an individual resource under Criterion 1.

110 Embarcadero/113-115 Steuart Street is therefore considered to be a "Category A.2 – Historical Resource" (Resources listed on adopted local registers, and properties that have been determined to appear or may become eligible, for the California Register) property for the purposes of the Planning Department's California Environmental Quality Act (CEQA) review procedures.

The character-defining features of the subject property are outlined on page 5 of this HRER.

Proposed Project Demolition Alteration

Per Drawings Dated: November 15, 2013 by Leddy, Maytum, Stacy Architects

Project Description

The proposed project involves the rehabilitation of an existing building including the construction of a one-story vertical addition, circulation penthouse and roof deck to create assembly and office space for the Commonwealth Club of California. The existing building is a 12,330 square foot, two-story, wood-frame commercial building. The overall shell of the existing building will be retained and it will remain a through-lot with exposed facades on the Embarcadero and Steuart Street. The cladding materials of the Embarcadero façade will be removed. The project preserves the Steuart Street façade, which is associated with the significant historic events of 1934. The heights of the first floor will remain 16'. The third story floor plate will be adjusted so that the height of the second floor will be extended to 21' to accommodate a new auditorium. The height of the new third floor will be 13' and the height to the top of the mechanical equipment will be 11'-9". The total height of the building to the top of the finish roof will be 51'-6". The design for the project is intended to achieve LEED Platinum certification.

Project Evaluation

If the property has been determined to be a historical resource in Part I, please check whether the proposed project would materially impair the resource and identify any modifications to the proposed project that may reduce or avoid impacts.

Subject Property/Historic Resource:

The project will not cause a significant adverse impact to the historic resource as proposed.

The project will cause a significant adverse impact to the historic resource as proposed.

California Register-eligible Historic District or Context:

The project will not cause a significant adverse impact to a California Register-eligible historic district or context as proposed.

The project will cause a significant adverse impact to a California Register-eligible historic district or context as proposed.

Staff concurs with the *Secretary of the Interior's Standards* (Standards) analysis prepared by Page & Turnbull and outlined on pages 23-27 of the Historic Resource Evaluation for 110 The Embarcadero/113-115 Steuart Street (dated November 26, 2013). The analysis concludes that the proposed project will comply with five Standards (#3, 4, 6, 7 and 8) and will not comply with five Standards (#1, 2, 5, 9 and 10). The project only meets half of the Standards and therefore does not comply with the Standards overall. Although compliance with the Standards generally means that a project would not cause a significant adverse impact, non-compliance does not necessarily mean that an impact would occur.

Staff finds that the proposed project would not cause a significant adverse impact to a historic resource such that the significance of a historic resource would be materially impaired. The proposed project includes the retention of the character-defining features of the Steuart Street façade of the property and removal of all character-defining features of the Embarcadero façade. Since the significance of the property under Criterion 1 is most closely tied to the Steuart Street façade, the building will continue to convey its significance under Criterion 1 after completion of the proposed project. The proposed project would not materially impair the significance of the individual historic resource under California Register Criterion 1 and would not cause a significant adverse impact.

Summary

The Department finds that the project is not consistent with the *Secretary of the Interior Standards for Rehabilitation*. However, as currently proposed, the project will not have a significant adverse impact upon a historic resource, as defined by CEQA.

PART II: SENIOR PRESERVATION PLANNER REVIEW

Signature: Tina Tam

Date: 1-13-2014

Tina Tam, *Senior Preservation Planner*

cc: Jeanie Poling, Environmental Planning
Pilar LaValley, Current Planning

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110 THE EMBARCADERO/113-115 STEUART STREET
HISTORIC RESOURCE EVALUATION- PART II

SAN FRANCISCO, CALIFORNIA
[13051]

Prepared for
THE COMMONWEALTH CLUB OF CALIFORNIA



PAGE & TURNBULL

imagining change in historic environments through design, research, and technology

NOVEMBER 26, 2013

FINAL

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I. INTRODUCTION

This Historic Resource Evaluation (HRE) has been prepared at the request of the Commonwealth Club for proposed alterations to the building at 110 The Embarcadero (APN 3715-002) in San Francisco's Waterfront area (**Figure 1**). 110 The Embarcadero is a two-story-over-basement, reinforced concrete commercial building constructed circa 1910 in the Commercial style. The building fronts onto both The Embarcadero and Stuart Street and is sometimes listed as 113-115 Stuart Street. Where the address "110 The Embarcadero" is used throughout this report, it is intended to denote the building as a whole, not just the Embarcadero façade.

The proposed project involves alteration of the existing building at 110 The Embarcadero and the addition of one vertical story and a circulation penthouse.

METHODOLOGY

This report follows the general outline provided by the San Francisco Planning Department for Historic Resource Evaluation Reports. Because the historic context has already been addressed in a Supplemental Information Form by ESA (2006) and the San Francisco Board of Supervisors determined in 2009 that there was substantial evidence that the building is a historical resource, this Historic Resource Evaluation does not include a building description, historic context statement, or evaluation of the property's eligibility for listing in the California Register. Rather, the report summarizes the previous evaluation process (with relevant documents included in the Appendix) and the property's historic significance. This report uses the previous documentation, additional historic photograph research, and a recent site visit to list character-defining features.

The Historic Resource Evaluation analyzes the proposed project under the provisions of the California Environmental Quality Act (CEQA) and the *Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring and Reconstructing Historic Buildings*. The existing building at 110 The Embarcadero is assessed for impacts caused by its alteration, and adjacent individual resources and the Port of San Francisco Embarcadero Historic District are assessed for impacts caused by the new construction.

Page & Turnbull conducted a site visit on August 1, 2013, and performed research to find additional historic photographs of both facades of the property.



Figure 1. Block map.

II. SUMMARY OF HISTORIC STATUS

California Historical Resource Status Code

Properties listed or under review by the State of California Office of Historic Preservation are assigned a California Historical Resource Status Code (Status Code) of "1" to "7" to establish their historical significance in relation to the National Register of Historic Places (National Register or NR) or California Register of Historical Resources (California Register or CR). Properties with a Status Code of "1" or "2" are either eligible for listing in the California Register or the National Register, or are already listed in one or both of the registers. Properties assigned Status Codes of "3" or "4" appear to be eligible for listing in either register, but normally require more research to

support this rating. Properties assigned a Status Code of “5” have typically been determined to be locally significant or to have contextual importance. Properties with a Status Code of “6” are not eligible for listing in either register. Finally, a Status Code of “7” means that the resource has not been evaluated for the National Register or the California Register, or needs reevaluation.

110 The Embarcadero is listed in the California Historic Resources Information System (CHRIS) with a status code of “7R,” which indicates that the property was “Identified in Reconnaissance Level Survey: Not Evaluated.”

Local Historic Districts

110 The Embarcadero is not located within the boundaries of any existing historic district or conservation district. It is adjacent to, but not part of, the Port of San Francisco Embarcadero Historic District, which is listed in the National Register of Historic Places (**Figure 2**).

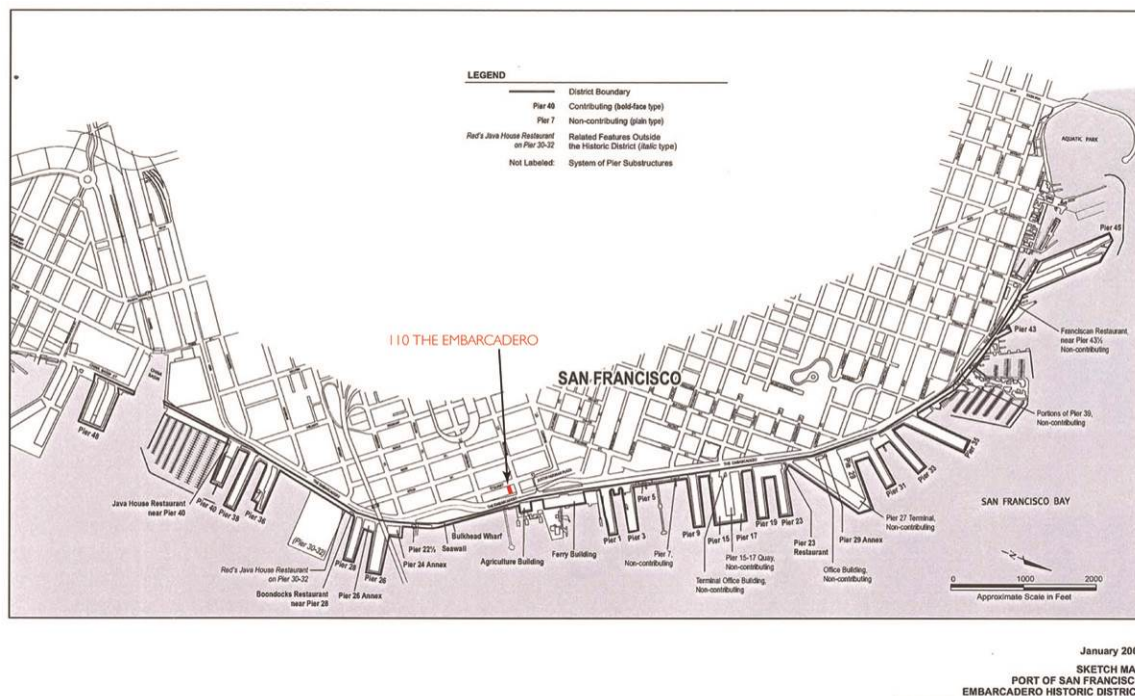


Figure 2. Port of San Francisco Embarcadero Historic District map with 110 The Embarcadero highlighted. 110 The Embarcadero is located outside the western boundary of the historic district.
Source: “Port of San Francisco Embarcadero Historic District,”
National Register Nomination Form (January 2006).

Historic Resource Evaluations

110 The Embarcadero was documented and evaluated for historic significance in a series of reports and findings between 2006 and 2009. The historic resource documents and motions associated with the property are appended to this report and include the following:

- *Supplemental Info Form for Historic Resource Evaluation* (ESA, November 27, 2006)
This document provided a historic context for the property. Research for this document did not uncover an association between the building and the 1934 Longshoreman’s Strike.
- *Historic Resource Analysis* (Page & Turnbull, July 25, 2007)
This report relied on the historic context from the Supplemental Information Form and contained no context, a brief evaluation of significance, and focused on impacts of a

previously proposed project (which involved demolition of the existing building and construction of a new multi-story building) on surrounding historic properties. The initial finding was that the building did not appear to be a historic resource and that the previously proposed project would not directly affect surrounding historic resources.

- *Addendum: Request for Information for 110 The Embarcadero/ 113-115 Steuart Street* (Page & Turnbull, May 22, 2008)
This memorandum addressed a request for additional context, analysis, and a finding of significance by the San Francisco Planning Department (email dated 1 May 2008). This document concluded that the building was significant under California Register Criterion A (Events) for its association with the 1934 Longshoremen's Strike. The building contained the union hall of the International Longshoremen's Association (I.L.A.) during the 1934 Longshoremen's Strike, and significant events occurred on the street outside the I.L.A. union hall entrance on "Bloody Thursday."
- *Addendum #2* (Page & Turnbull, July 10, 2008)
This memorandum addressed a request for a more in-depth integrity analysis by the San Francisco Planning Department. Though the building possesses significance, the document concluded that the building did not possess sufficient integrity to be eligible for listing as a historic resource in the California Register.
- *Historic Resource Evaluation Response (HRER)* (San Francisco Planning Department, June 9, 2008)
In this document, the Planning Department found that the building was significant under California Register Criterion 1 (Event) and that the building retained enough historic fabric and architectural details to convey its significance.
- San Francisco Board of Supervisors Motion No. M09-62 (March 31, 2009)
The Board of Supervisors voted on a motion adopting findings related to the reversal of the approval of the mitigated Negative Declaration for a previously proposed project. The motion concluded that there was substantial evidence in the record that the building retains integrity, including information contained in a letter and testimony from Bradley Wiedmaier and in a letter and testimony from Michael R. Corbett.

In recent informal communications, the San Francisco Planning Department indicated that it views this as the definitive document on whether the building is a historic resource.¹ Thus, the building is considered by the Planning Department (the Lead Agency) to be eligible for listing in the California Register and a historic resource for the purposes of CEQA.

¹ Email communication with Gretchen Hilyard, San Francisco Preservation Planner (September 11, 2013).

III. CHARACTER-DEFINING FEATURES

For a property to be eligible for national or state designation under one of the significance criteria, the essential physical features (or character-defining features) that enable the property to convey its historic identity must be evident. To be eligible, a property must clearly contain enough of those characteristics, and these features must also retain a sufficient degree of integrity. Characteristics can be expressed in terms such as form, proportion, structure, plan, style, or materials.

Based on the features listed in the Board of Supervisors motion, as well as information from Page & Turnbull's integrity analysis (July 2008), historic photographs, and a recent site visit, Page & Turnbull has developed a list of character-defining features for 110 The Embarcadero. The historic images below show the Steuart Street façade during the period of significance (the year 1934) and in the 1950s, and also include images from the 1950s of the Embarcadero facade that show original second story fenestration and ornamental features.

113-115 Steuart Street Historic Photographs



Figure 3. 113-115 Steuart Street, 1934.
Source: Online Archive of California, I0015726A.



Figure 4. 113-115 Steuart Street, 1934.
Source: Online Archive of California, I0015779A.



Figure 5. 113-115 Steuart Street, 1934.
Source: Online Archive of California, I0015721A.



Figure 6. 113-115 Steuart Street, 1957.
Source: San Francisco History Center, Assessor's Office
Negative Collection, sfp-
23_block_box2_block#3715_no.12_on_strip

110 The Embarcadero Historic Photographs



Figure 7. 110 The Embarcadero, 1950.
Source: San Francisco History Center, Assessor's Office
Negative Collection, sfp-
23_address_box1_embarcadero_100-114



Figure 8. 110 The Embarcadero, 1957.
Source: San Francisco History Center, Assessor's Office
Negative Collection, sfp-
23_block_box2_block#3715_no.g10_on_strip



Figure 9. 110 The Embarcadero (partial view on left), 1964.
Source: San Francisco Historical Photograph Collection, AAC-5090.

Current Photographs



Figure 10. 113-115 Steuart Street.
Source: Page & Turnbull, August 2013.



Figure 11. 113-115 Steuart Street, view of altered ground floor from the interior (boarded on exterior).
Source: Page & Turnbull, August 2013.



Figure 12. 110 The Embarcadero.
Source: Page & Turnbull, August 2013.



Figure 13. 110 The Embarcadero, view of second story.
Source: Page & Turnbull, August 2013.



Figure 13. 110 The Embarcadero, view of altered ground floor from interior (boarded on exterior).
Source: Page & Turnbull, August 2013.

CHARACTER-DEFINING FEATURES

The character-defining features of 110 The Embarcadero that represent its historic use and Classical Revival/Mission Revival architectural elements that were extant during the 1934 Longshoreman's Strike, include:

Overall:

- Two-story massing and rectangular plan
- Stucco cladding

Steuart Street façade:

- Shaped parapet with coping
- Fenestration size and pattern of four window openings and one blind center window at the second story
- Concrete wall panels above the window openings

Embarcadero façade:

- Flat parapet
- Fenestration size and pattern of five window openings at the second story
- Concrete wall panels above the window openings at the second story
- Classical Revival ornament, including six Tuscan pilasters between windows at the second story, reed molding (beltcourse) below the second story, cornice above the second story windows, and medallions above each pilaster.

It is important to note that a high degree of alteration has occurred on both façades since the period of significance and many features that existed in 1934 have already been removed or altered. In particular, the ground floor of each façade has been removed in its entirety. The list above indicates the features that remain. Though the Embarcadero façade retains more features from the period of significance due to the retention of some original ornament, the Steuart Street façade is more important in association with the Longshoreman's Strike and the entrance to the union hall was on Steuart Street (as indicated in all previous documentation of the property, listed on pages 2-3 of this report).

IV. SUMMARY OF HISTORIC CONTEXT AND SIGNIFICANCE

HISTORIC CONTEXT

The San Francisco chapter of the International Longshoremen's Association (I.L.A.) was headquartered in 110 The Embarcadero, also called 113 Steuart Street, from 1932 to 1934, and was headquarters during the 1934 Longshoremen's Strike.² According to Giulio Accornero, whose family owned the building from 1946 to 2012 and leased a commercial unit there beginning in 1933 for their Sierra Hills Winery, there was originally a wall that divided the Embarcadero retail uses from the Steuart Street retail.³ This wall is visible on historic Sanborn Fire Insurance maps, and though the divider wall has since been removed, there is also a central parapet wall that continues to exist on the roof with two roof structures on either side. In the early 1930s, the Steuart Street facade of the building had entrances to two commercial units on the ground floor and the union hall on the second floor.⁴ The union hall included a large meeting room that could accommodate about one hundred people.⁵

In May 1934, the I.L.A. rallied a dock strike to obtain better wages and a union-controlled hiring hall. Clashes followed between strikers and strike-breakers hired by the shipping companies. The union hall at 113 Steuart Street saw intense activity during the strike, as strikers gravitated to their headquarters. This was especially true on July 5, Bloody Thursday. That day, strikers and police faced each other on the waterfront. Police drove strikers up Rincon Hill where the picketers hurled bricks and the police threw tear gas.⁶ After police officers scattered the crowd off the hill, the strikers regrouped near the intersection of Mission and Steuart streets in what one newspaper called "the sanguinary stand in front of I.L.A. headquarters."⁷ Various witness accounts tell of police inspectors shooting into the crowd after their car was surrounded by angry strikers seeking to overturn it.⁸ Strikers Howard Sperry and Carl Olsen were shot on the south side of Mission Street, east of Steuart Street, on their way from the soup kitchen to the union hall.⁹

Sperry and Olsen were taken immediately to the Harbor Emergency Hospital and then the Mission Emergency Hospital, where Sperry was pronounced dead. At least twenty other wounded strikers were carried to the union hall, where a doctor treated them until police shot tear gas into the hall to force evacuation.¹⁰ A memorial was chalked on the sidewalk where Sperry and Olsen fell, which persisted despite police efforts to erase it.¹¹

² The I.L.A. Local 38-79 was reorganized in 1933 and had its union hall at 113 Steuart Street. Henry Schmidt, "Secondary Leadership in the ILWU, 1933-1966," an oral history conducted in 1974, 1975, 1981 by Miriam F. Stein and Estolv Ethan Ward (Regional Oral History Office, The Bancroft Library, University of California Berkeley, 1983), 52, 215.

³ Communication between Commonwealth Club and Giulio Accornero, 3 September 2013.

⁴ Catherine Powell, ed., *The San Francisco Labor Landmarks Guidebook: A Register of Sites and Walking Tours* (San Francisco: Labor Archives and Research Center, San Francisco State University, unpublished manuscript), 50. Manuscript courtesy of the Labor Archives and Research Center at San Francisco State University.

⁵ Schmidt, 100.

⁶ Paul Taylor and Norman Leon Gold, "San Francisco and the General Strike," *Survey Graphic*, 23:9 (September 1934), 405.

⁷ "Bloody Thursday Leaves San Francisco Bitter Taste of Civil War" (6 July 1934). Qtd. in *Coroner's Inquest Re: Howard Sperry and Nicholas Bordoise* (August 2, 1934), 1. File "San Francisco Maritime and General Strike" courtesy of the Labor Archives and Research Center at San Francisco State University.

⁸ Paul Taylor and Norman Leon Gold.

⁹ *Coroner's Inquest Re: Howard Sperry and Nicholas Bordoise* (August 2, 1934), 11. File "San Francisco Maritime and General Strike" courtesy of the Labor Archives and Research Center at San Francisco State University; Schmidt, 95.

¹⁰ Germain Bulcke, "Longshore Leader and ILWU-Pacific Maritime Association Arbitrator," an oral history conducted in 1983 by Estolv Ethan Ward (Regional Oral History Office, The Bancroft Library, University of California Berkeley, 1984), 178; *Coroner's Inquest*, 59; Louis Prisco, "San Francisco Waterfront" (unpublished, 2002), 10. Distributed as background for a

The same day, on Spear Street, police shot and killed Nicholas Bordoise, a cook who was volunteering in the I.L.A. soup kitchen.¹² A total of 32 people were shot and over 100 wounded on Bloody Thursday.¹³

The bodies of Sperry and Bordoise lay in state in the union hall at 113 Steuart Street on Sunday, July 8, and possibly for several days before.¹⁴ On July 9, the funeral procession left from the building after a former longshoreman gave a speech in the union hall.¹⁵ At least fifteen thousand people marched in the silent procession, which extended for a mile along Market Street and took one hour to pass.¹⁶

The events of Bloody Thursday and the solemn funeral procession influenced other unions' decisions to hold a General Strike in San Francisco.¹⁷ Author Paul Eliel said that the procession "provided the impetus that made events which followed inevitable":

...As the last marcher broke ranks, the certainty of a general strike, which up to this time had appeared to many to be the visionary dream of a small group of the most radical workers, became for the first time a practical and realizable objective.¹⁸

The General Strike lasted four days. Soon after, I.L.A. members voted to arbitrate the disputed issues under a presidential-appointed arbitration board.¹⁹ The longshoremen's strike ended on July 31.²⁰

The arbitration board presented its decision in October 1934.²¹ One of the results of the ruling was the establishment of a jointly-run hiring hall, which unions hoped would prevent the fierce competition and blacklisting that occurred in employer-run "shape-ups" on the docks. Initially, the hiring dispatcher operated out of the I.L.A. union hall at 113 Steuart Street.²² The July confrontation also played a role in bringing about not only greater workers' rights but the creation of the National Labor Relations Board (NLRB) signed into law by President Franklin D. Roosevelt on the one-year anniversary of Bloody Thursday.

The 1934 Strike and Bloody Thursday were also associated with the Audiffred Building next door to 113 Steuart Street because I.L.A. organizer Harry Bridges had his office inside the building at this time.²³ Sperry and Olson were shot outside the Audiffred Building.

walking tour of San Francisco. File "San Francisco Maritime and General Strike" courtesy of the Labor Archives and Research Center at San Francisco State University.

¹¹ Hedley, 8.

¹² *Coroner's Inquest*, 1.

¹³ Locals 10-39-75-91 & Pensioners, "Let Us Not Forget! Bloody Thursday" (San Francisco: unpublished pamphlet). File "San Francisco Maritime and General Strike" courtesy of the Labor Archives and Research Center at San Francisco State University.

¹⁴ Hedley, 9; Prisco, 11.

¹⁵ "Teamsters Vote to Widen Strike in San Francisco" (*New York Times*, 9 July 1934); Prisco, 11; Schmidt, 105.

¹⁶ David F. Selvin, *A Terrible Anger: The 1934 Waterfront and General Strikes in San Francisco* (Detroit: Wayne State University Press, 1996), 11; "Teamsters Vote."

¹⁷ Powell, 50; Hedley, 9; Bulcke, 180.

¹⁸ Paul Eliel, qtd. in Selvin, 16.

¹⁹ Selvin, 17, 230-31.

²⁰ *Ibid.*, 238.

²¹ *Ibid.*

²² Harry Bridges, with Harvey Schwartz, ed., "Harry Bridges: An Oral History About Longshoring, the Origins of the ILWU and the 1934 Strike," 27 July 2004, ILWU Oral History Collection (<http://www.ilwu.org/history/oral-histories/harry-bridges.cfm>, accessed 19 May 2008); Bulcke, 51.

²³ Larry D. Hatfield, "Audiffred Building: Shrine, Victory and Dream" (*San Francisco Examiner*, April 7, 1982), ZA1.

SIGNIFICANCE

Based upon this information, the existing building at 110 The Embarcadero/113-115 Steuart Street is significant under California Register of Historical Resources (California Register) Criterion A (Events) for its association with the 1934 Longshoremen's Strike. The building contained the union hall of International Longshoremen's Association (I.L.A.) during the 1934 Longshoremen's Strike, and significant events occurred on the street outside the I.L.A. union hall entrance on "Bloody Thursday." The events associated with the I.L.A. and this strike led to the 1934 General Strike.

The building was not found significant for association with people (Criterion B) or architecture/design (Criterion C).

V. CONTEXT & RELATIONSHIP

The content of this section is excerpted from Page & Turnbull's *Historic Resource Analysis* (July 25, 2007). A more extensive historical context, with information not directly related to the building's significance, can be found in ESA's Supplemental Information Form from 2006. The information and images below remain relevant and no changes have been made to the subject block or immediate surrounding blocks between 2007 and 2013.

IMMEDIATE NEIGHBORHOOD CONTEXT

110 The Embarcadero is located on the west side of The Embarcadero between Mission and Howard streets. Historically, this area was associated with the development of the waterfront, and housed a variety of maritime uses including piers where ships docked, shipbuilding facilities, lumber yards, hiring halls, taverns and sailors' unions. Today the area features a mixture of residential and commercial uses in a built environment that is widely varied in size, materials, and age.

Analysis of the 1887 Sanborn Fire Insurance Maps shows that this block originally held Piers 7-13. The project site was labeled as Pier 7, and held a hay barn owned by H. Dutton Jr. Other uses in the area included a coal yard, a few small boat shops, and a number of large lumber yards.

By 1900, the project site was still occupied by a hay barn, and the coal yard had expanded to include several coal sheds and a few rail spurs. The Sailors' Union Headquarters with shops and a saloon was constructed adjacent to the project site, and several hotels, saloons, restaurants, and boarding houses were constructed on nearby parcels.²⁵ This type of development was typical along the waterfront, and industries and services for sailors were common tenants in these waterfront establishments.

The 1906 Earthquake and Fire ravaged this portion of the city, and nearly all of the structures on the block (including the hay barn at the project site) were destroyed by either the fire itself or by the efforts of firefighters and soldiers to dynamite buildings as an attempt to prevent the fire from spreading further.²⁶ The city experienced a surge of building in the aftermath of the disaster, and 110 The Embarcadero was rebuilt as a small, two-story, reinforced concrete commercial building circa 1910 as part of this construction boom.

²⁵ Sanborn Fire Insurance Map, San Francisco (1899).

²⁶ San Francisco Architectural Heritage, Vertical Files, "Audiiffred Building."

Throughout the 1920s and 1930s, the waterfront was the center for shipping and the labor force that supported it. Union halls and businesses that catered to sailors were located near the piers. The immediate vicinity of the subject property, particularly on Steuart Street, was the focal point of the 1934 Waterfront and General Strike and events that occurred on July 5, 1934, known as “Bloody Thursday.”²⁷

During World War II, the port of San Francisco was largely occupied by the military, and was the second largest military port of embarkation in the country. After the war, the waterfront began to decline. The invention of container shipping in the 1950s changed the way ports operated, requiring larger wharves to accommodate larger ships and truck transportation. These changes made ports like San Francisco outdated and allowed ports with large open spaces like Oakland and Los Angeles to dominate California’s waterfront economy.

In the meantime, beginning in 1953, the city began building the Embarcadero Freeway, which connected the San Francisco-Oakland Bay Bridge to the Golden Gate Bridge via elevated freeways along the waterfront. Though only a 1.2 mile portion was built north to Broadway, this section physically severed the city from the port and waterfront views. By the 1960s, the deterioration of San Francisco’s port had also resulted in the decline of supporting maritime uses in the areas surrounding the waterfront, and the area just south of the Ferry Building became the skid row of the San Francisco waterfront.²⁸

Redevelopment efforts were prevalent throughout the city in the 1970s, and the waterfront was no exception. In the area immediately surrounding 110 The Embarcadero, many of the buildings either received major alterations or were replaced by large towers in the 1970s and 1980s as part of efforts to revitalize the area (**Figure 14**). Following the Loma Prieta Earthquake in 1989, the Embarcadero Freeway was demolished, thereby reconnecting the city to its waterfront. Further revitalization in the 1990s and 2000s in the immediate vicinity included establishing a pedestrian promenade on the west side of the Embarcadero, landscaping the new at-grade boulevard that replaced the Embarcadero Freeway, and extending the N-Judah and T-Third Street Muni Metro lines down the center of the boulevard. A rotating art program was also established on the waterfront, including one site at Pier 14, across the street from the subject property, where large-scale sculptures have been installed. The immediate neighborhood is currently characterized by a mixture of office, residential, and commercial uses; buildings ranging in height from three to twenty-seven stories; and masonry, concrete, or steel-and-glass construction (**Figures 15 to 20**).

²⁷ San Francisco Architectural Heritage, Vertical Files, “Audiffred Building.”

²⁸ “Port of San Francisco Embarcadero Historic District,” National Register Nomination Form (January 2006), 41-43.



Figure 14. Map of 110 The Embarcadero and surrounding area (construction dates of buildings shown in parentheses).

Source: City and County of San Francisco Parcel Map (altered by author).



Figure 15. West side of The Embarcadero, looking southwest from Mission Street. 110 The Embarcadero is the second building from the right.

Source: Page & Turnbull, June 2007. This view remains identical in 2013.



Figure 16. The Embarcadero, showing both east and west sides of the street. View south from the intersection with Mission Street.
Source: Google street view, 2013.



Figure 17. Mission Street; looking west from The Embarcadero. 110 The Embarcadero is the building at the far left.
Source: Page & Turnbull, June 2007. This view remains identical in 2013.



Figure 18. East side of Stuart Street, looking southeast from Mission Street. 110 The Embarcadero is the second building from the left.

Source: Page & Turnbull, June 2007. This view remains identical in 2013.



Figure 19. West side of Stuart Street, looking southwest from Mission Street.

Source: Page & Turnbull, June 2007. This view remains identical in 2013.



Figure 20. Steuart Street, looking north from Howard Street.
Source: Page & Turnbull, June 2007. This view remains identical in 2013.

NEIGHBORING HISTORIC RESOURCES

The following section is also excerpted from Page & Turnbull’s July 2007 *Historic Resource Analysis*. It includes a description of historic resources in the area surrounding 110 The Embarcadero.

Audiffred Building, 100 The Embarcadero

110 The Embarcadero is situated adjacent to the Audiffred Building (San Francisco Landmark #7), which is located at the southwest corner of Mission Street and The Embarcadero (**Figure 21**). Constructed in 1889 by French immigrant Hippolite d’Audiffret (later Anglicized to Audiffred) as a commercial building, it housed many shops and saloons, and was the home of the Coast Seaman’s Union (later renamed the Sailors’ Union of the Pacific and the International Seaman’s Union). The Audiffred Building was saved from destruction during the 1906 earthquake and fire by bribing soldiers and firefighters not to dynamite it; it also played a central role in the Waterfront Strike of 1934. In 1978, the building was gutted by a fire, and in 1981 it was reconstructed and designated as a local landmark.²⁹

²⁹ San Francisco Architectural Heritage, Vertical Files, “Audiffred Building.”



Figure 21. Audiffred Building (1889). View west from The Embarcadero.
Source: Page & Turnbull, June 2007.

Rincon Annex United States Post Office, 180 Steuart Street

Just west of 110 The Embarcadero is the Rincon Annex United States Post Office (San Francisco Landmark #107), which was constructed in 1940 and designed by architect G.S. Underwood (see **Figure 8**). The large reinforced concrete post office is an outstanding example of the Art Deco-Moderne style by one of the foremost architects of federal buildings of that era, and the interior features a 27-panel mural painted in 1946-1948 by artist Anton Refregier. The building is listed in the National Register of Historic Places, and was released by the Federal government for private development with the stipulation that the historic integrity of the architecture be preserved.³⁰ The post office has been incorporated into the large Rincon Center development, which was designed as a mixed-use commercial, office, and residential project. Rincon Center occupies the entire block bounded by Mission, Steuart, Howard, and Spear streets, and includes two large towers constructed in 1988 by Pereira Associates.

YMCA Building, 169 Steuart Street

Also nearby is the nine-story masonry YMCA building at 169 Steuart Street, constructed in 1926 (**Figure 22**). Originally constructed as an Army-Navy YMCA, it was opened to civilians in 1968 and has offered youth and community programs ever since. The building was renovated in 1991 and is currently occupied by the YMCA and the Harbor Court Hotel.³¹ It is listed in Article 11 as a Category II- Significant Building.

³⁰ Page & Turnbull, "Rincon Annex Post Office," Historic Preservation Certification Application: Part 2 (December 1985).

³¹ YMCA, "A Brief History," <http://www.ymcasf.org/Embarcadero/about.html> (accessed 3 July 2007).



Figure 22. YMCA Building (1926), looking southwest from The Embarcadero.
Source: Page & Turnbull, June 2007.

Agriculture Building, 101 The Embarcadero

The Agriculture Building is located across The Embarcadero from the project site (**Figure 23**). The Agriculture Building was constructed in 1915 and designed by architect A.A. Pyle of the State Department of Engineering as the Ferry Station Post Office Building. By 1930, the San Francisco branch of the Department of Agriculture had acquired the building; other subsequent tenants have included the Southern Pacific Commissary, the offices of the Oakland Alameda Ferry, the Fire Marshall of the Port, a U.S. Customs Office, and several private offices. The building is a contributor to the Port of San Francisco Embarcadero Historic District and currently houses a variety of commercial uses. It is the only building within the Historic District that is in proximity to 110 The Embarcadero.



Figure 23. Agriculture Building (1915), looking east from Mission Street.
Source: Page & Turnbull, June 2007.

V. PROJECT IMPACTS

This section analyzes the project-specific impacts of the proposed Commonwealth Club project at 110 The Embarcadero on the environment, as required by the California Environmental Quality Act (CEQA).

CALIFORNIA ENVIRONMENT QUALITY ACT (CEQA)

The California Environment Quality Act (CEQA) is state legislation (Pub. Res. Code §21000 et seq.), which provides for the development and maintenance of a high quality environment for the present-day and future through the identification of significant environmental effects.³² CEQA applies to “projects” proposed to be undertaken or requiring approval from state or local government agencies. “Projects” are defined as “...activities which have the potential to have a physical impact on the environment and may include the enactment of zoning ordinances, the issuance of conditional use permits and the approval of tentative subdivision maps.”³³ Historic and cultural resources are considered to be part of the environment. In general, the lead agency must complete the environmental review process as required by CEQA. In the case of the proposed project at 110 The Embarcadero, the City of San Francisco will act as the lead agency.

According to CEQA, a “project with an effect that may cause a substantial adverse change in the significance of an historic resource is a project that may have a significant effect on the environment.”³⁴ Substantial adverse change is defined as: “physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historic resource would be materially impaired.”³⁵ The significance of an historical resource is materially impaired when a project “demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance” and that justify or account for its inclusion in, or eligibility for inclusion in, the California Register.³⁶ Thus, a project may cause a substantial change in a historic resource but still not have a significant adverse effect on the environment as defined by CEQA as long as the impact of the change on the historic resource is determined to be less-than-significant, negligible, neutral or even beneficial.

A building may qualify as a historic resource if it falls within at least one of four categories listed in CEQA Guidelines Section 15064.5(a), which are defined as:

1. A resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources (Pub. Res. Code SS5024.1, Title 14 CCR, Section 4850 et seq).
2. A resource included in a local register of historical resources, as defined in Section 5020.1(k) of the Public Resources Code or identified as significant in an historical resource survey meeting the requirements of section 5024.1 (g) of the Public Resources Code, shall be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.

³² State of California, California Environmental Quality Act, http://ceres.ca.gov/topic/env_law/ceqa/summary.html, accessed 31 August 2007.

³³ Ibid.

³⁴ CEQA Guidelines subsection 15064.5(b).

³⁵ CEQA Guidelines subsection 15064.5(b)(1).

³⁶ CEQA Guidelines subsection 15064.5(b)(2).

3. 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 may be considered to be an historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the California Register of Historical Resources (Pub. Res. Code SS5024.1, Title 14 CCR, Section 4852).
4. The fact that a resource is not listed in, or determined to be eligible for listing in the California Register of Historical Resources, not included in a local register of historical resources (pursuant to section 5020.1(k) of the Pub. Resources Code), or identified in an historical resources survey (meeting the criteria in section 5024.1(g) of the Pub. Resources Code) does not preclude a lead agency from determining that the resource may be an historical resource as defined in Pub. Resources Code sections 5020.1(j) or 5024.1.³⁷

Based on the Board of Supervisors' motion, 110 The Embarcadero meets the criteria for listing in the California Register of Historical Resources. As such, the building falls within Category 3 and therefore qualifies as a historic resource under CEQA.³⁸

CITY AND COUNTY OF SAN FRANCISCO PLANNING DEPARTMENT CEQA REVIEW PROCEDURES FOR HISTORIC RESOURCES

As a certified local government and the lead agency in CEQA determinations, the City and County of San Francisco has instituted guidelines for initiating CEQA review of historic resources. The San Francisco Planning Department's "CEQA Review Procedures for Historical Resources" incorporates the State's CEQA Guidelines into the City's existing regulatory framework.³⁹ To facilitate the review process, the Planning Department has established the following categories to establish the baseline significance of historic properties based on their inclusion within cultural resource surveys and/or historic districts:

- **Category A – Historical Resources is divided into two sub-categories:**
 - **Category A.1 – Resources listed on or formally determined to be eligible for the California Register.** These properties will be evaluated as historical resources for purposes of CEQA. Only the removal of the property's status as listed in or determined to be eligible for listing in the California Register of Historic Resources by the California Historic Resources Commission will preclude evaluation of the property as an historical resource under CEQA.

³⁷ Pub. Res. Code SS5024.1, Title 14 CCR, Section 4850 et seq.

³⁸ According to CEQA Guidelines Section 15064.5(a), Category 3: "Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the California Register of Historical Resources."

³⁹ San Francisco Planning Department, *San Francisco Preservation Bulletin No. 16: City and County of San Francisco Planning Department CEQA Review Procedures for Historic Resources* (October 8, 2004).

- **Category A.2 – Adopted local registers, and properties that have been determined to appear or may become eligible, for the California Register.** These properties will be evaluated as historical resources for purposes of CEQA. Only a preponderance of the evidence demonstrating that the resource is not historically or culturally significant will preclude evaluation of the property as an historical resource. In the case of Category A.2 resources included in an adopted survey or local register, generally the “preponderance of the evidence” must consist of evidence that the appropriate decision-maker has determined that the resource should no longer be included in the adopted survey or register. Where there is substantiated and uncontroverted evidence of an error in professional judgment, of a clear mistake or that the property has been destroyed, this may also be considered a “preponderance of the evidence that the property is not an historical resource.”
- **Category B - Properties Requiring Further Consultation and Review.** Properties that do not meet the criteria for listing in Categories A.1 or A.2, but for which the City has information indicating that further consultation and review will be required for evaluation whether a property is an historical resource for the purposes of CEQA.
- **Category C - Properties Determined Not To Be Historical Resources or Properties For Which The City Has No Information indicating that the Property is an Historical Resource.** 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.⁴⁰

110 The Embarcadero is classified under **Category A.2 – Adopted local registers, and properties that have been determined to appear or may become eligible, for the California Register.** It is therefore considered by the City and County of San Francisco to be a historic resource under CEQA.

PROPOSED PROJECT DESCRIPTION

The following description of the proposed project is based on a package of architectural drawings produced by Leddy Maytum Stacy and dated August 22, 2013 with revised drawings dated November 15, 2013. The proposal intends to alter the existing two-story building and construct one vertical story and a circulation penthouse above the existing building.

The overall shell of the existing building will be retained and it will remain a through-lot with exposed facades on the Embarcadero and Steuart Street. The project preserves the Steuart Street façade, which is associated with the significant historic events of 1934. The height of the first floor will remain 16'. The third story floorplate will be adjusted so that the height of the second floor will be extended to 21'. The height of the new third floor will be 13' and the height to the top of the mechanical equipment will be 11'-9". The total height of the building to the top of the finish roof is 51'-6", whereas the height limit for the parcel is 84'. The design of this project is intended to achieve LEED Platinum certification.

⁴⁰ San Francisco Planning Department, “San Francisco Preservation Bulletin No. 16 – CEQA and Historical Resources” (May 5, 2004) 3-4.

Embarcadero (East) Façade

The existing façade on the Embarcadero (east) side of the building will be demolished and replaced with a contemporary glazed aluminum curtain wall system that will incorporate the new third story. The new façade will be divided into five bays, similar to the original façade and the second story of the Steuart Street façade. The outer edges of the façade at the north and south ends will be clad in fiber cement panels for the full three-story height. The ground floor will feature two entrances: a single exit stair door in the first (southern-most) bay, surrounded by fiber cement panels, and a pair of fully glazed aluminum doors in the fourth bay. Aside from the first bay, the rest of the ground floor storefront will be glazed with aluminum dividers that break up each bay into three vertical windows and a horizontal division toward the top to create a transom. A flat steel and glass canopy/marquee will project over the paired doors and will support three-dimensional lettering that reads “The Commonwealth Club.” Operable awning-sash windows will be located in the transom. Spandrel panels in the curtain wall system will be located above the transom and will horizontally divide the ground floor (base) from the upper stories (shaft) of the building, reflecting the façade organization of nearby historic buildings.

The upper two stories will be clad in an energy-efficient glazed curtain wall system that will maximize transparency for views into the Commonwealth Club community forum activities and views out to the Embarcadero and San Francisco Bay. The glazing features pronounced vertical aluminum muntins that divided the five bays, and narrower vertical and horizontal muntins that break up the façade into a grid of smaller units – three vertical muntins between each larger vertical muntin and horizontal muntins at the second and third stories. A horizontal louvered air intake separates the second from the third story. Operable awning and casement windows will be located at each of the upper stories: a ribbon of operable windows at the top and bottom of the second story and a ribbon at the top of the third story windows. Vertical sunshades with horizontal termination will project from the six pronounced muntins the length of the third story. The façade will terminate in a parapet with a metal top plate.

Steuart Street (West) Façade

The Steuart Street façade will retain much of the existing façade (both historic features and post-1934 ornamentation) while the third story addition will be recessed 6'-10" and 12'-6" behind the existing shaped parapet. The ground floor will feature a bulkhead and a new glazed aluminum storefront system in the three north bays, which feature vertical muntins to separate each bay. A horizontal muntin toward the top creates a transom with fixed glazing. This organization of the storefront system is reminiscent of the historic storefront that once existed on the Steuart Street façade. The two south bays contain two single doors (a staff entry door and exit stair door) surrounded by fiber cement panels and capped with a flat canopy, transom windows, and three dimensional lettering in the two south bays.

At the second story, the proposed design will retain and restore the stucco cladding, six Doric pilasters, beltcourses, and six medallions. The four windows will be replaced with new fixed three-lite windows similar in style to the historic windows, within the original openings.

According to sight-line renderings, much of the third story will be visible from the street when seen from the intersection of Steuart and Mission Streets, with less of the addition visible when looking northeast from the south due to the tall adjacent building. The third story addition will be set back 6'-10" on the south end and 12'-6" on the north end. The planter terrace will occupy 368 square feet total, and a glass guardrail will be located behind the existing second story parapet, projecting above it at most locations. The third story façade will be framed at the north and south ends by fiber cement panels. The four north bays will contain a glazed aluminum curtain wall system, with pronounced vertical muntins dividing the bays and smaller vertical and horizontal muntins that divide the glazing into smaller units. A ribbon consisting of two rows of operable awning windows

(motorized operable windows in the upper row and manually operable windows in the lower row) will be located within the glazing. The south bay will be clad in fiber cement panels. The third story will terminate in a glass guardrail at the roof level.

Rooftop Features

The roof will be used as an outdoor deck space. Two horizontal steel and wood trellises, supported by metal corner posts, will be located on the roof and recessed 18'-8" from the plane of the Embarcadero façade and 37' from the plane of the third story of the Steuart Street façade. The purpose of the trellises is to support greenery. Though little visible from a vantage point directly in front of the building's Embarcadero facade, when standing at the intersections of the Embarcadero and Mission Street or Steuart Street and Mission Street, the trellises will be visible above the roofline of the subject building and the rooftop of the neighborhood Audiffred Building. The elevator lobby for two elevators will be located south of the east trellis, with the southeast exit stair, elevator, and boiler room penthouse next to the adjacent building to the south. The southeast exit stair penthouse will be recessed 18'-8" from the parapet at the Embarcadero façade and will have a flat roof. The elevator lobby will be recessed 37'-2" from the parapet and will feature a glazed storefront to the north, fiber cement panel cladding to the south, and a flat roof. The penthouse for the southwest exit stair will be flush with the plane of the third story and will feature a shed roof. A cement panel wall will screen mechanical equipment between the boiler room and the southwest stair penthouse. A roof deck with pedestal pavers will be located at the east end of the roof, and high planters and vegetated roof will be situated to the north, west, and south. There will be three rectangular skylights, and the entire roof will be surrounded by a parapet.

Interior Floor Plans

The existing basement has a 7'-0" clear height and this height will be maintained to contain storage rooms with a center hall, an elevator lobby toward the east, and a trash room. An electrical room, furnace room, and exit stair will be located at the basement's west end.

The ground floor level will contain a lobby at the east end of the building, accessed directly from the Embarcadero. Stairs will climb to the second floor, and a media display will be located adjacent to the stairs. A separate exit stair will be located at the southeast corner of the building, accessed through one internal door and the exit door at the south end of the Embarcadero façade. West of the lobby is the elevator vestibule, two elevators, and women's and men's restrooms. The center of the ground floor contains a library, and the west end contains a gallery leading to a meeting room for public forums that can be divided into two by an acoustical operable partition. A pantry and second exit stair are located at the southwest end of the floor.

The second floor contains a prefunction room to the east, accessed by the main stair and the southeast exit stair. To the west are the elevator vestibule, elevator shaft, storage room, and restrooms. The main part of the second floor contains an auditorium with a temporary platform at the west end. Behind the auditorium are an AV room, audio room, green room, and small restroom, with access to the southeast exit stair.

The third floor contains a president's office, prefunction space, and boardroom at the east end, with access to the southwest access stair. Immediately to the west are the elevator vestibule, the elevator shaft, a copy room, kitchen, three individual restrooms, and two offices. An open office and three individual offices are located in the west half of the third floor, and have access to the southeast exit stair. There is an exterior platform at the west end of the floor where the third floor is recessed from the existing façade at Steuart Street.

SECRETARY OF THE INTERIOR'S STANDARDS FOR THE TREATMENT OF HISTORIC PROPERTIES

The *Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings (Secretary's Standards)* provide guidance for working with historic properties. The *Secretary's Standards* are used by Federal agencies and local government bodies across the country (including the San Francisco Historic Preservation Commission) to evaluate proposed rehabilitative work on historic properties. The *Secretary's Standards* are a useful analytic tool for understanding and describing the potential impacts of substantial changes to historic resources. Compliance with the *Secretary's Standards* does not determine whether a project would cause a substantial adverse change in the significance of an historic resource. Rather, projects that comply with the *Secretary's Standards* benefit from a regulatory presumption under CEQA that they would have a less-than-significant adverse impact on an historic resource. Projects that do not comply with the *Secretary's Standards* may or may not cause a substantial adverse change in the significance of an historic resource.

The *Secretary's Standards* offers four sets of standards to guide the treatment of historic properties: Preservation, Rehabilitation, Restoration, and Reconstruction. The four distinct treatments are defined as follows:

Preservation: The *Standards for Preservation* “require retention of the greatest amount of historic fabric, along with the building’s historic form, features, and detailing as they have evolved over time.”

Rehabilitation: The *Standards for Rehabilitation* “acknowledge the need to alter or add to a historic building to meet continuing new uses while retaining the building’s historic character.”

Restoration: The *Standards for Restoration* “allow for the depiction of a building at a particular time in its history by preserving materials from the period of significance and removing materials from other periods.”

Reconstruction: The *Standards for Reconstruction* “establish a limited framework for re-creating a vanished or non-surviving building with new materials, primarily for interpretive purposes.”⁴¹

Typically, one set of standards is chosen for a project based on the project scope. In this case, the proposed project scope includes the rehabilitation of 110 The Embarcadero to meet the evolving use of the building. Therefore, the *Standards for Rehabilitation* will be applied.

Standards for Rehabilitation

The following analysis applies each of the *Standards for Rehabilitation* to the proposed project at 110 The Embarcadero. This analysis is based upon a package of architectural drawings produced by Leddy Maytum Stacy and dated August 2, 2013 with revised drawings dated November 15, 2013, which are included as an attachment to this report (**See Appendix**).

⁴¹ Kay D. Weeks and Anne E. Grimmer, *The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring and Reconstructing Historic Buildings* (Washington, D.C.: U.S. Department of the Interior, 1995), 2.

Rehabilitation Standard 1: *A property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces and spatial relationships.*

Although the building is currently vacant and has been for several years, its historical uses were commercial retail on the ground floor and offices and a labor union hall for the International Longshoremen's Association (I.L.A.) on the second floor. The new project for the Commonwealth Club will maintain the primary historic use of the site (meeting hall) by reintroducing an auditorium for lectures and events, as well as offices for the organization. For this particular building, there is no use that is more compatible than re-use as a meeting hall.

The proposed alterations associated with the new use will not affect any historic spaces or spatial relationships that may be significant.

All character-defining features on the Steuart Street façade, where significant 1934 Longshoreman's Strike events occurred and where the entrance to the I.L.A. Union Hall existed, will be retained and rehabilitated.

All character-defining features on the second floor of the Embarcadero façade will be removed to accommodate a new façade that will better serve the meeting hall and office use.

As designed, the historic use of the building will be maintained and all character-defining features on the more significant façade of the building – the Steuart Street façade – will be retained and rehabilitated. Removal of character-defining features will be limited to the second story of the Embarcadero façade. Character-defining features that will be removed from this façade include wall cladding, fenestration openings, Classical Revival ornament, and the second-story parapet. Removal of the distinctive materials and features on the Embarcadero facade is in conflict with Standard 1.

Therefore, as designed, the proposed project will not be in compliance with Rehabilitation Standard 1.

Rehabilitation Standard 2: *The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces, and spatial relationships that characterize the property will be avoided.*

As proposed, the project will partially retain the historic character of the subject property. The proposed project will retain and restore the existing historic features on the Steuart Street façade of the building, including the stucco cladding, four fenestration openings and center blind opening, and wall panels above the windows. It will also retain the pilasters that post-date the period of significance. The third-story addition is stepped back from the second story parapet in order to distinguish the old from the new. Aspects of the new design also reference historic features of the building that have been removed, such as installing a contemporary storefront system that includes transom divisions and a bulkhead.

While the important labor union strike events occurred in the vicinity of the entrance to the I.L.A. union hall on Steuart Street, making that façade the most important feature of the building, the proposed design for the Embarcadero façade removes all features and materials from the period of significance on that façade and replaces them with a contemporary glass curtain wall that aligns with the plane of the new third story addition. Thus, the project removes distinctive materials and alters features that characterize the property. The historic building would be recognizable on Steuart Street but not on the Embarcadero, even though the curtain wall reimagines the five-bay organization of the original façade.

As designed, all character-defining features of the Steuart Street façade will be retained and all character-defining features of the Embarcadero façade will be removed. Due to the loss of character-defining features on the Embarcadero facade, the proposed project will not be in compliance with Rehabilitation Standard 2.

Rehabilitation Standard 3: *Each property will be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or elements from other historical properties, will not be undertaken.*

The proposed project will not create a false sense of history. All new construction will be built using modern materials such as aluminum, glass, and fiber cement panels, and will be recognized as a physical record of its time, place, and use. On the Steuart Street façade, no attempt will be made to remove ornament such as pilasters that post-date the period of significance or to restore missing features. Thus, no conjectural features or elements from other historical properties will be introduced.

As designed, the proposed project will be in compliance with Rehabilitation Standard 3.

Rehabilitation Standard 4: *Changes to a property that have acquired significance in their own right will be retained and preserved.*

110 The Embarcadero did not undergo any changes since 1934 that have acquired significance in their own right. Thus, only features that were extant during the 1934 Longshoremen's Strike are considered character-defining.

As designed, the proposed project will be in compliance with Rehabilitation Standard 4.

Rehabilitation Standard 5: *Distinctive materials, features, finishes and construction techniques or examples of craftsmanship that characterize a property will be preserved.*

As described under Standards 1 and 2, the extant historic materials, features, and finishes on the historically significant Steuart Street façade will be retained and rehabilitated. However, the distinctive materials on the Embarcadero façade, such as the stucco wall cladding, fenestration openings, Classical Revival pilasters, molded beltcourse and cornice, medallions, and flat parapet above the second story will be removed.

As designed, the proposed project will not be in compliance with Rehabilitation Standard 5.

Rehabilitation Standard 6: *Deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature will match the old in design, color, texture, and, where possible, materials. Replacement of missing features will be substantiated by documentary and physical evidence.*

Where historic features on the Stuart Street façade are retained, the proposed project involves repair rather than replacement.

As designed, the proposed project will be in compliance with Rehabilitation Standard 6.

Rehabilitation Standard 7: *Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.*

If the Steuart Street façade is cleaned during construction prior to being repainted, it will be cleaned with a warm-water wash followed by light-duty restoration cleaner, if needed.

As designed, the proposed project will be in compliance with Rehabilitation Standard 7.

Rehabilitation Standard 8: *Archeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measure will be undertaken.*

The proposed project includes minor excavation work to build an elevator shaft. If any archaeological material should be encountered during this project, construction should be halted and proper mitigation undertaken.

As designed, the proposed project will be in compliance with Rehabilitation Standard 8.

Rehabilitation Standard 9: *New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work shall be differentiated from the old and will be compatible with the historic materials, features, size, scale, proportion, and massing to protect the integrity of the property and environment.*

The proposed project includes alterations to the Steuart Street and Embarcadero facades and the construction of a new third story, circulation penthouses, and rooftop patio. As described in Standards 1, 2, and 5, the exterior alterations on the Embarcadero façade will remove historic materials and features that characterize the property. The Embarcadero façade will no longer read as a two-story building constructed ca. 1910. The third story will be clearly evident on the Embarcadero, and the rooftop trellises will also be visible above the roofline of the adjacent Audiffred Building. These features will alter the character of the building and its original massing along the Embarcadero.

On Steuart Street, the third story addition will be differentiated from the rehabilitated facade in terms of materials used for the structure, cladding, and ornament. The addition will be designed in a contemporary vocabulary using an aluminum and glass storefront system and fiber cement wall panels. These materials are compatible with the historic stucco cladding of the Steuart Street façade, which is the only remaining original material on this façade since the windows and ground floor storefront system have been replaced. The size and scale of the third story and circulation penthouses are in proportion with the original two stories below, although they are visible from the street.

Regarding compatibility with the environment, the building's scale and massing; placement of circulation penthouses next to a non-historic adjacent building to the south; clearly delineated base, middle, and top and five-bay division of the new Embarcadero façade; and use of storefront transoms on both facades will protect the integrity of the environment. (Note: The next section of this report discusses compatibility with surrounding historic resources in more detail).

The addition to the Steuart Street façade is compatible with the historic building and will not impact any character-defining features. As such, the proposed addition along this façade will be in compliance with Standard 9. The removal of character-defining features on the Embarcadero façade in order to accommodate a new façade will not be in compliance with Rehabilitation Standard 9.

As designed, the proposed project will not be in compliance with Rehabilitation Standard 9.

Rehabilitation Standard 10: *New additions and adjacent or related new construction will be undertaken in such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.*

The proposed project includes the demolition of the Embarcadero facade and construction of a new facade, replacement of the non-historic ground floor storefront and windows on the Steuart Street facade, a third story addition, circulation penthouses, and occupiable rooftop space. If the new additions and related new construction are removed in the future, the essential form and integrity of the historic property would be impaired—primarily due to the loss of a facade on the Embarcadero side.

As designed, the proposed project will not be in compliance with Rehabilitation Standard 10.

Summary of Secretary of the Interior's Standards Analysis

The proposed project for 110 The Embarcadero will comply with five Standards (#3, 4, 6, 7, and 8) and will not comply with five Standards (#1, 2, 5, 9, and 10), generally reflecting that features and materials will be preserved on the Steuart Street facade but will be removed from the Embarcadero facade.

In order to assess impacts pursuant to CEQA, compliance with the Standards must be either a 'yes' or 'no' finding; a 'yes' finding would be based on compliance with all or the vast majority of the Standards. Because the proposed project complies with half of the individual Standards, it does not meet the Secretary of the Interior's *Standards for Rehabilitation*.

IMPACTS ON SURROUNDING HISTORIC RESOURCES

The following section provides analysis of the potential impact of the proposed project on the surrounding neighborhood. The proposed project is located in an area with a number of historic resources, including the Audiffred Building (San Francisco Landmark #7), the Rincon Annex Post Office (San Francisco Landmark #107), the YMCA Building, and the Agriculture Building within the Embarcadero Historic District. Therefore, the project's potential impact on these surrounding resources should be evaluated independent of the existing building at 110 The Embarcadero.

Proposed Height within the Neighborhood

The neighborhood around 110 The Embarcadero is composed of buildings of varied height and massing, ranging from the three-story plus penthouse Audiffred Building on the corner of Mission Street and The Embarcadero to the 27-story Steuart Tower and 23-story Rincon Center Towers. The height of the proposed project is within the range currently found in the vicinity, so the new construction does not appear to impact the neighborhood character of this area due to its height.

Historic Resources

The neighborhood lacks uniform historic character due to numerous alterations to properties and new construction in the area. While there are several historic resources in the area, they are each individually significant for their representation of distinct periods of the area's history, so there does not appear to be a potential historic district in the area that could be affected by the project. A discussion of potential impacts on the individual historic resources in the immediate vicinity of 110 The Embarcadero follows:

The Audiffred Building (San Francisco Landmark #7) is located immediately north of 110 The Embarcadero, and would have the most likelihood for being affected by the proposed project. The historic building's integrity of setting has already been compromised by the alteration and replacement of other buildings in the area, so the proposed change to the project site does not appear to significantly affect this aspect of the Audiffred Building's integrity. The scale and proportions of the proposed addition are comparable to the Audiffred Building, maintaining the same width as the extant building and increasing the overall height by only one full floor. The penthouse features are pushed away from the Audiffred building, against the adjacent non-historic building to the south. Thus, spatial relationships will not affect the Audiffred Building to the extent that it would no longer be eligible for listing as a historic resource. The commercial character of 110 The Embarcadero and the surrounding area will be maintained in the new design through the retention of the Stuart Street façade and the use of contemporary commercial building materials. The proposed design divides the new Embarcadero façade into five bays and alludes to a traditional base, shaft, and terminating cap. In addition, the design incorporates transom windows on both facades to convey a traditional organization of ground floor storefronts. The project may have potential indirect impacts on the visual character and aesthetics of the landmark, as the Classical Revival style and punched fenestration openings of the existing Embarcadero façade, which is more akin to the Second Empire style Audiffred Building, will be replaced with a glass curtain wall façade. Despite the fact that the proposed design is not fully compatible with the historic character of the adjacent Audiffred Building, the proposed project would not affect the building's ability to convey its significance or its eligibility for listing in Article 10 of the San Francisco Planning Code.

The former Rincon Annex United States Post Office (San Francisco Landmark #107) is located across Stuart Street to the west of 110 The Embarcadero. The proposed project would not affect the Rincon Annex Post Office's eligibility for listing in Article 10. The Rincon Annex Post Office was incorporated into the new Rincon Center development in 1988, and the addition of a penthouse on the roof of the building and two tall towers on the adjacent parcel did not affect its historic character to the extent that the building was no longer eligible for listing as a landmark. The proposed new construction at 110 The Embarcadero is similar in scale to the Rincon Center project, retains the historic two-story Stuart Street façade that faces the Post Office, and uses a contemporary commercial vocabulary for the third story and penthouses. Furthermore, the third story is recessed behind the plane of the historic façade, away from the Rincon Annex United States Post Office. The proposed project therefore does not appear to have any additional effects on the historic Rincon Annex Post Office that would affect the building's integrity and affect its ability to convey its significance.

The YMCA Building is located on the same block as 110 The Embarcadero, but at the southeast end of the block. Constructed in 1926, this building is a historic resource, but it is located at a distance sufficiently removed from the project site that the proposed project would not affect the YMCA Building's ability to convey its significance or its eligibility for listing in any national, state, or local historical registers.

The Agriculture Building is located across The Embarcadero to the east of the project site. The proposed project would not have a direct impact on this historic resource, since the height is commensurate with surrounding buildings and the proposed style of the Embarcadero façade maintains a commercial aesthetic and a traditional division of parts, albeit through the use of contemporary materials. The proposed project would not change the Agriculture Building's ability to relate to nearby Port-associated buildings and structures on the east side of the Embarcadero. Thus, it does not appear to affect the Agriculture Building's eligibility for listing in any national, state, or local historical registers.

The Agriculture Building is the only building within the Port of San Francisco Embarcadero Historic District that is within a close distance to 110 The Embarcadero. The waterfront directly across the street from the subject building features a promenade and pedestrian pier. The proposed project does not affect the essential form and integrity of the Port of San Francisco Embarcadero Historic District, and would therefore not affect the historic district's listing in the National Register.

In conclusion, the proposed project at 110 The Embarcadero does not appear to have any direct or indirect impacts on any other known historic resources in the area to the extent that the buildings would no longer be eligible for listing as historic resources.

ANALYSIS OF PROJECT-SPECIFIC IMPACTS

Because the proposed project consists of the alteration of an individually eligible historic resource and removal of character-defining features on the building's Embarcadero facade, the project does not fully comply with the *Secretary of the Interior's Standards for the Treatment of Historic Properties*. Non-compliance with the Standards does not automatically indicate that there would be a significant impact to the resource, however.

The proposed treatment of the Steuart Street façade is in complete compliance with the *Standards*. The historic events that took place near the building's Steuart Street façade and the fact that the I.L.A. union hall entrance was located on Steuart Street are the primary factors in the building's significance. Therefore, we believe that the proposed rehabilitation of the Steuart Street façade would allow the building to retain sufficient integrity to convey its reason for significance and be eligible for listing in the California Register.

As the analysis in the previous section demonstrates, the project as currently designed appears to be compatible with the adjacent Audiffred Building, Rincon Annex U.S. Post Office, YMCA Building, as well as the Agricultural Building within the Port of San Francisco Embarcadero Historic District. It does not appear that the proposed project would affect the eligibility of these surrounding historic resources.

ANALYSIS OF CUMULATIVE IMPACTS

CEQA defines cumulative impacts as follows:

“Cumulative impacts” refers to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts. The individual effects may be changes resulting from a single project or a number of separate projects. 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 can result from individually minor but collectively significant projects taking place over a period of time.⁴²

The proposed project at 110 The Embarcadero does not appear to cause any cumulative impacts. No other known current projects or potential projects near the 110 The Embarcadero. In addition, there are no other known current or potential projects near the Audiffred Building, Rincon Annex U.S.

⁴² CEQA Guidelines, Article 20, subsection 15355.

Post Office, YMCA Building, and the Agricultural Building within the Port of San Francisco Embarcadero Historic District.

PROJECT IMPROVEMENT MEASURES

Page & Turnbull does not believe that the proposed alteration of the building at 110 The Embarcadero will affect the historic resource's eligibility for listing in the California Register. However, we recommend the following project improvement measures that may assist in lessening the impact of alterations to The Embarcadero façade.

Documentation

The project sponsor shall document the affected historical resource and its setting. Generally, this documentation shall be in accordance with Historic American Buildings Survey (HABS) Level III, which includes:

1. Drawings: sketch plan
2. Photographs: photographs with large-format negatives of exterior and interior views.
3. Written data: architectural data form.

HABS material standards regarding reproducibility, durability, and size shall be met.

Hard copies of the photographs and report should be presented to the San Francisco Planning Department, and to repositories such as the San Francisco Public Library's San Francisco History Center and the California Historical Society, which are invested in archiving the history of San Francisco. This improvement measure would create a collection of reference materials that would be available to the public and inform future research. Implementation of this improvement measure would assist in reducing project-specific impacts.

Interpretive Program

The project sponsor shall also install a permanent on-site interpretive display in a publicly-accessible location, such as the lobby or street frontage. The display shall focus on the subject building's association with the 1934 Longshoreman's Strike. Historic photographs and some of the HABS photos of the existing building may be used to illustrate the history. The primary goal is to educate the public about the property's historic themes, associations and lost character-defining features within broader historical, social, and physical landscape contexts.

In considering project improvement measures, the Lead Agency may consider that the Commonwealth Club has unique historical material as a result of its role as a major public forum in San Francisco during the labor events that occurred in 1934. The Club was the site of ongoing discussion and debate in San Francisco about the same labor issues that lay behind the strike. For example, the Club hosted President Roosevelt's Labor Secretary Frances Perkins to talk about labor in America; former coal breaker boy and Presbyterian Minister John McDowell on "Labor and Tomorrow"; California State Commerce Secretary Simon Lubin on agricultural labor battles in California's Central Valley; AFL President William Green on "Labor: Whither," and UMW President John L. Lewis on "Labor's Participation in Industrial Recovery." In conjunction with the telling of the history of 110 The Embarcadero and the I.L.A.'s role in the Longshoreman's Strike, the Club could contribute by bringing photos, transcripts, and other material from these events, which have not previously been publicly accessible, to light as part of the display.

VI. CONCLUSION

Originally constructed ca. 1910, the building at 110 The Embarcadero is significant under California Register Criterion 1 (Events) for its association with the 1934 Longshoremen's Strike. The building was headquarters of International Longshoremen's Association (I.L.A.) during the 1934 Longshoremen's Strike, and significant events occurred on the Steuart Street outside the I.L.A. union hall entrance on "Bloody Thursday." The events associated with the I.L.A. and this strike led to the 1934 General Strike. Consequently, 110 The Embarcadero is considered to be a historical resource for the purposes of CEQA, and the proposed project is therefore subject to review by the San Francisco Planning Department.

The proposed project at 110 The Embarcadero preserves the historic Steuart Street façade, where significant Longshoreman Strike events occurred in 1934. The project includes various alterations to the existing two-story building and construction of one vertical story and a circulation penthouse above the existing building. As the above analysis demonstrates, the proposed project will result in the removal of character-defining features on the building's Embarcadero façade but will carefully retain and rehabilitate the character-defining features that remain on the building's Steuart Street façade. Due to the relationship of historic events to the building's Steuart Street façade, we believe that the building will be able to communicate its significance once the project is complete and will therefore continue to be eligible for listing in the California Register.

The project does not appear to impact nearby historic resources and maintains the general height of surrounding historic buildings in the area.

Page & Turnbull has proposed project improvement measures to assist in reducing project-specific impacts.

VII. REFERENCES CITED

PUBLISHED WORKS

Page & Turnbull, Inc. "Rincon Annex Post Office." Historic Preservation Certification Application: Part 2. December 1985.

"Port of San Francisco Embarcadero Historic District." National Register Nomination Form. January 2006.

San Francisco Planning Department. *San Francisco Preservation Bulletin No. 16: City and County of San Francisco Planning Department CEQA Review Procedures for Historic Resources*. San Francisco: October 8, 2004.

Selvin, David F. *A Terrible Anger: The 1934 Waterfront and General Strikes in San Francisco*. Detroit: Wayne State University Press, 1996.

Weeks, Kay D. and Anne E. Grimmer. *The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring and Reconstructing Historic Buildings*. Washington, D.C.: U.S. Department of the Interior, 1995.

UNPUBLISHED WORKS

Coroner's Inquest Re: Howard Sperry and Nicholas Bordoise (August 2, 1934), 1. File "San Francisco Maritime and General Strike" courtesy of the Labor Archives and Research Center at San Francisco State University.

Hedley, George P. "The Strike as I Have Seen It: An Address Before the Church Council for Social Education" (Berkeley, CA: July 19, 1934), 6. File "Ephemera: San Francisco Maritime and General Strike" courtesy of the Labor Archives and Research Center at San Francisco State University.

Locals 10-39-75-91 & Pensioners, "Let Us Not Forget! Bloody Thursday" (San Francisco: unpublished pamphlet). File "San Francisco Maritime and General Strike" courtesy of the Labor Archives and Research Center at San Francisco State University.

Prisco, Louis. "San Francisco Waterfront" (unpublished, 2002). Distributed as background for a walking tour of San Francisco. File "San Francisco Maritime and General Strike" courtesy of the Labor Archives and Research Center at San Francisco State University.

Powell, Catherine, ed. *The San Francisco Labor Landmarks Guidebook: A Register of Sites and Walking Tours*. San Francisco: Labor Archives and Research Center, San Francisco State University, unpublished manuscript.

San Francisco Architectural Heritage. Vertical Files: "Audiffred Building."

PUBLIC RECORDS

San Francisco Assessor's Records.

Sanborn Fire Insurance Maps. San Francisco (1887, 1899, 1913, 1950).

NEWSPAPERS, JOURNALS, AND PERIODICALS

Hatfield, Larry D. "Audiffred Building: Shrine, Victory and Dream" *San Francisco Examiner* (April 7, 1982), ZA1.

"Scores Injured, Gassed as Police Battle Mobs; Cargo Moving Continues" *San Francisco Daily News* (5 July 1934).

"Teamsters Vote to Widen Strike in San Francisco" *New York Times* (9 July 1934).

INTERNET

State of California, California Environmental Quality Act,
http://ceres.ca.gov/topic/env_law/ceqa/summary.html, accessed 31 August 2007.

YMCA. "A Brief History." <http://www.ymcasf.org/Embarcadero/about.html> (accessed 3 July 2007).

OTHER

Germain Bulcke, "Longshore Leader and ILWU-Pacific Maritime Association Arbitrator," an oral history conducted in 1983 by Estolv Ethan Ward (Regional Oral History Office, The Bancroft Library, University of California Berkeley, 1984).

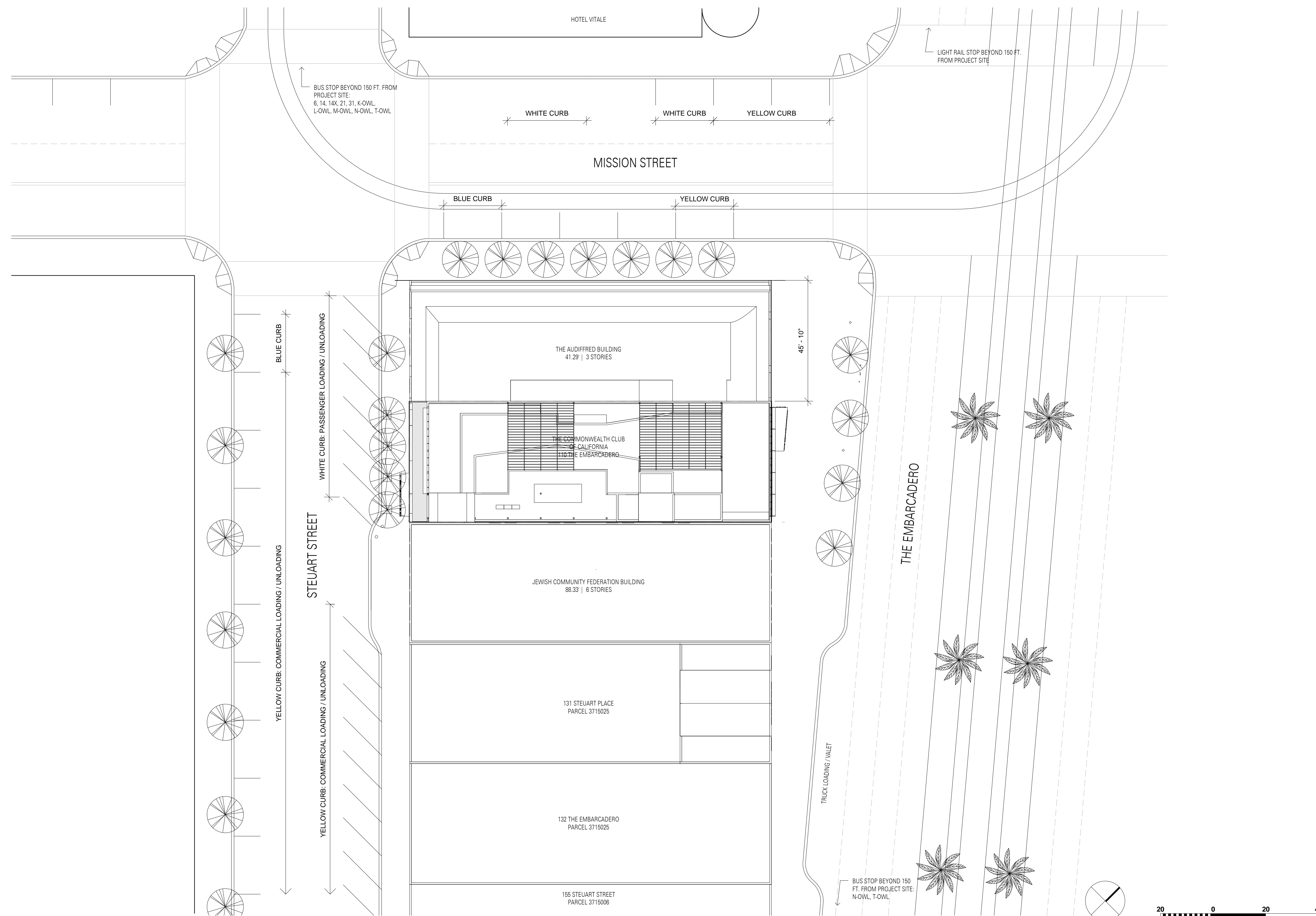
Harry Bridges, with Harvey Schwartz, ed., "Harry Bridges: An Oral History About Longshoring, the Origins of the ILWU and the 1934 Strike," 27 July 2004, ILWU Oral History Collection (<http://www.ilwu.org/history/oral-histories/harry-bridges.cfm>, accessed 19 May 2008)

Henry Schmidt, "Secondary Leadership in the ILWU, 1933-1966," an oral history conducted in 1974, 1975, 1981 by Miriam F. Stein and Estolv Ethan Ward. (Regional Oral History Office, The Bancroft Library, University of California Berkeley, 1983), 52, 215.

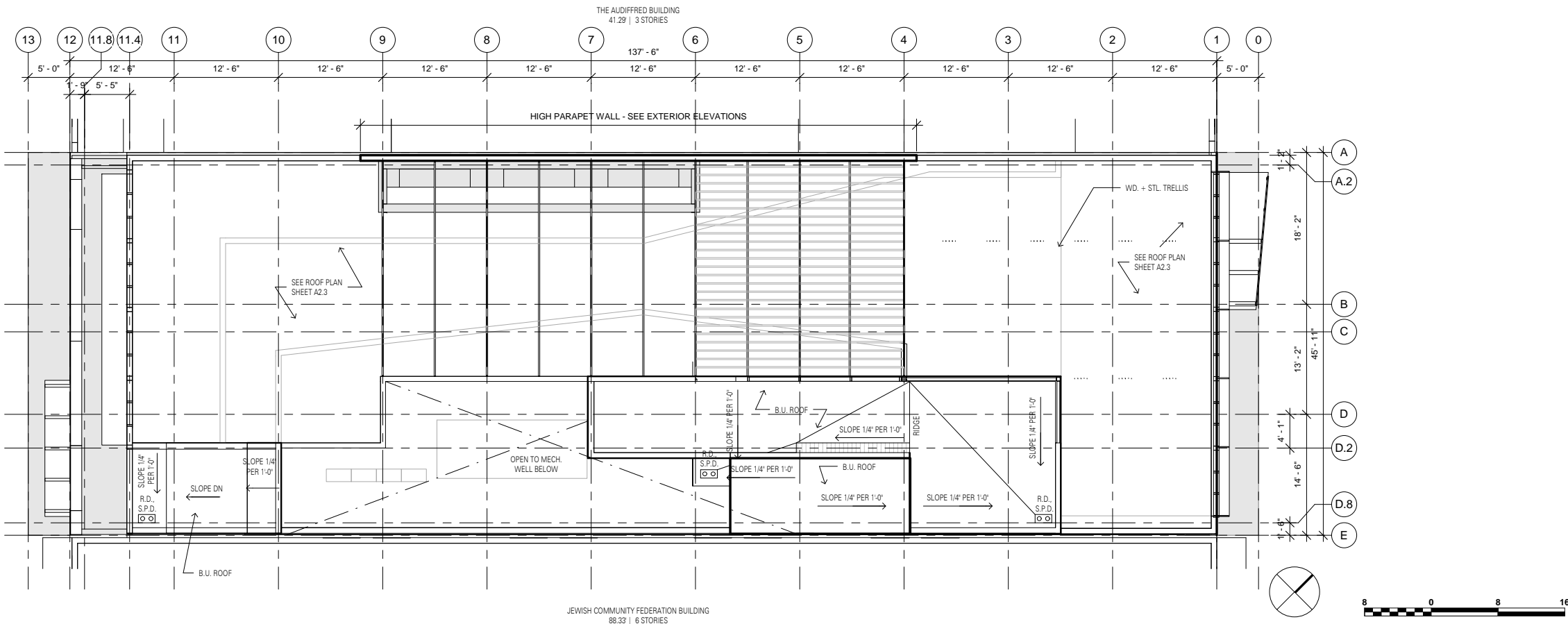
VIII. APPENDIX

DRAWINGS OF PROPOSED PROJECT

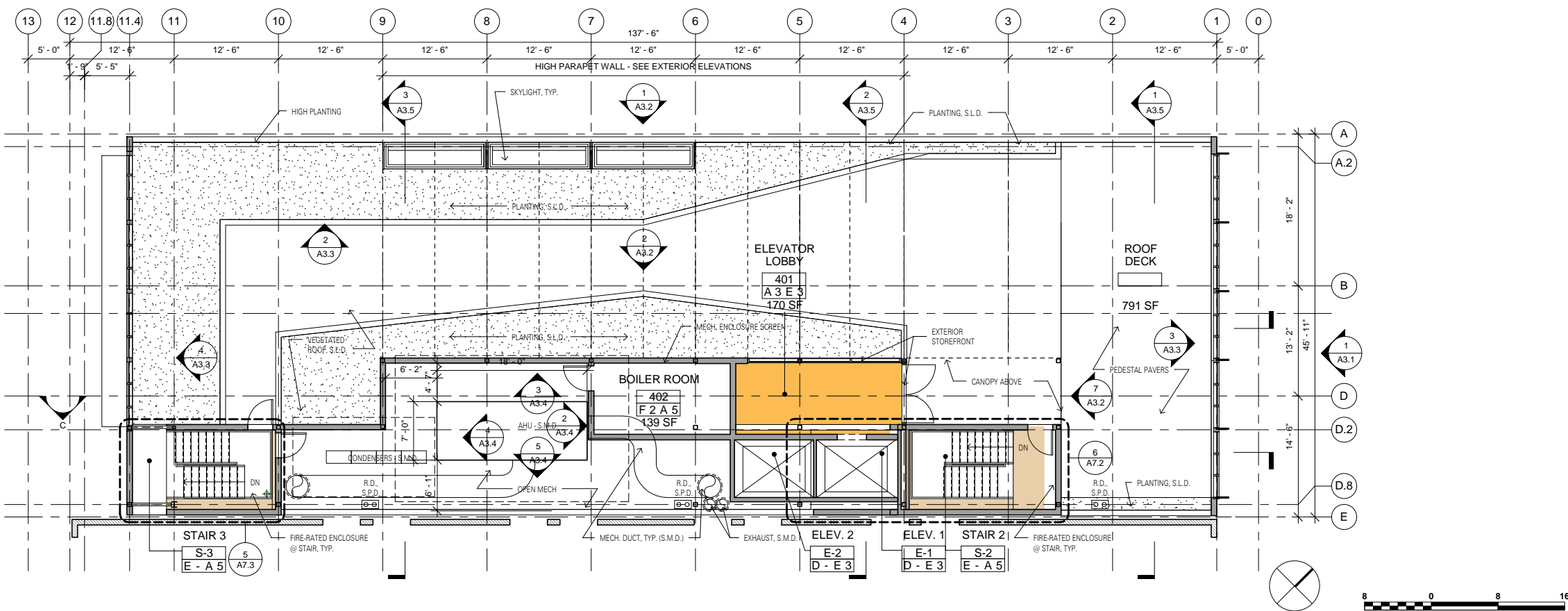
Please refer to the attached drawing set assembled by Leddy Maytum Stacy and dated August 22, 2013.



1 SITE PLAN
A1.0 SCALE: 1" = 20'-0"



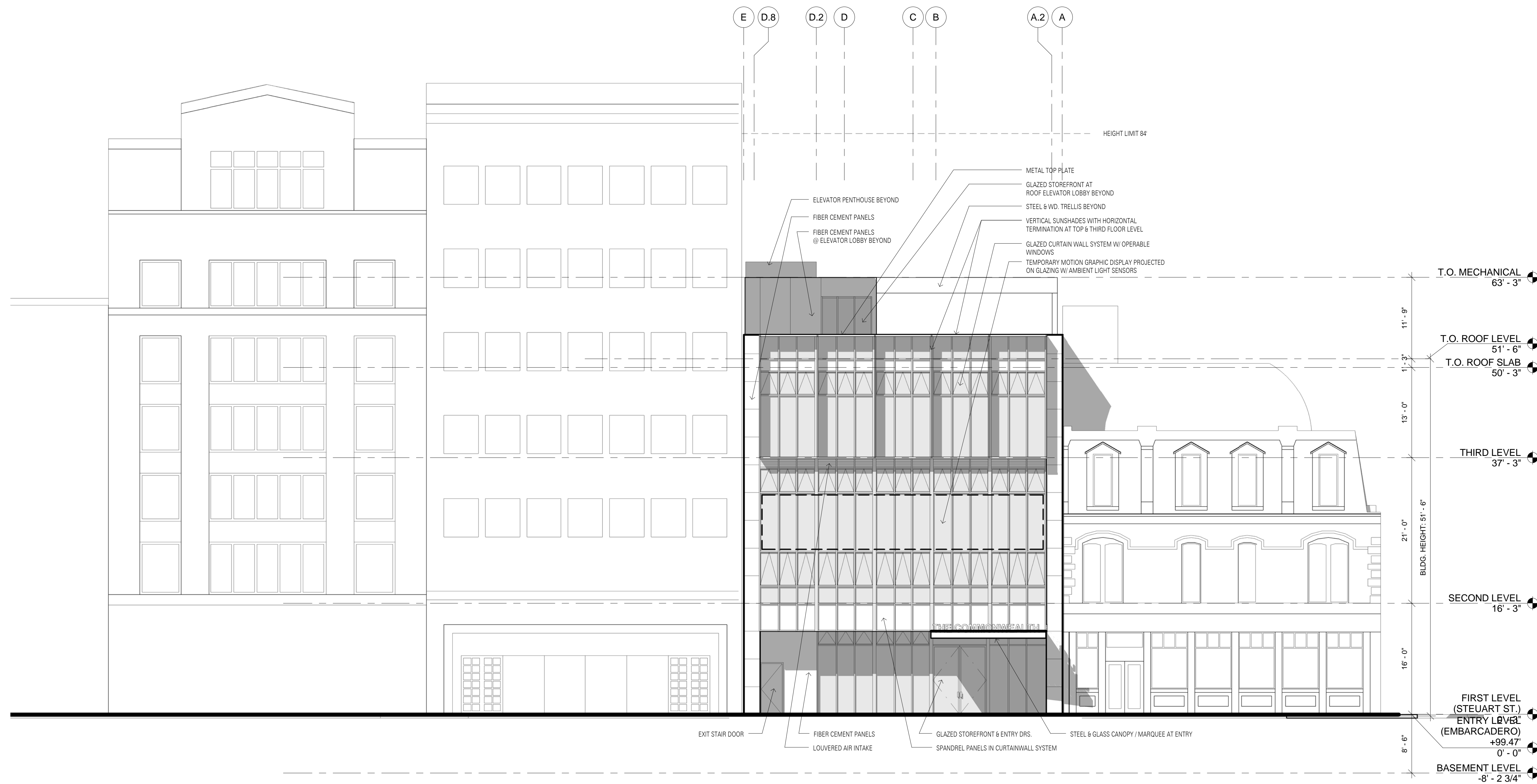
2 SITE PLAN
 A2.3 SCALE: 1/8" = 1'-0"



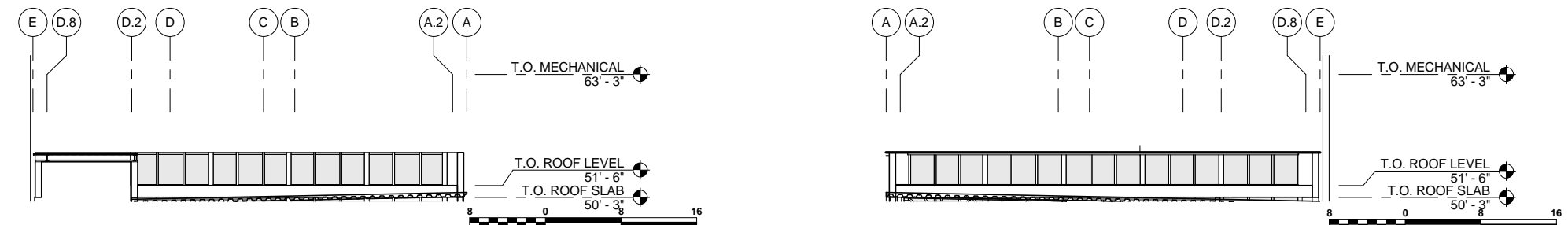
1 ROOF PLAN
 A2.3 SCALE: 1/8" = 1'-0"

THE DESIGN OF THE NEW EMBARCADERO FACADE WILL:

1. BE COMPRISED OF FIVE-PART DIVISION OF FACADE SIMILAR TO EXISTING
2. INCLUDE ENERGY-EFFICIENT CURTAIN WALL SYSTEM INCORPORATING OPERABLE WINDOWS & VERTICAL SUNSHADES
3. MAXIMIZE TRANSPARENCY FOR VIEWS INTO COMMONWEALTH CLUB ACTIVITIES AND VIEWS OUT TO BAY & CITY
4. INTEGRATE CAPABILITY FOR VIDEO PROJECTIONS
5. INCLUDE A STEEL & GLASS CANOPY / MARQUEE AT ENTRY

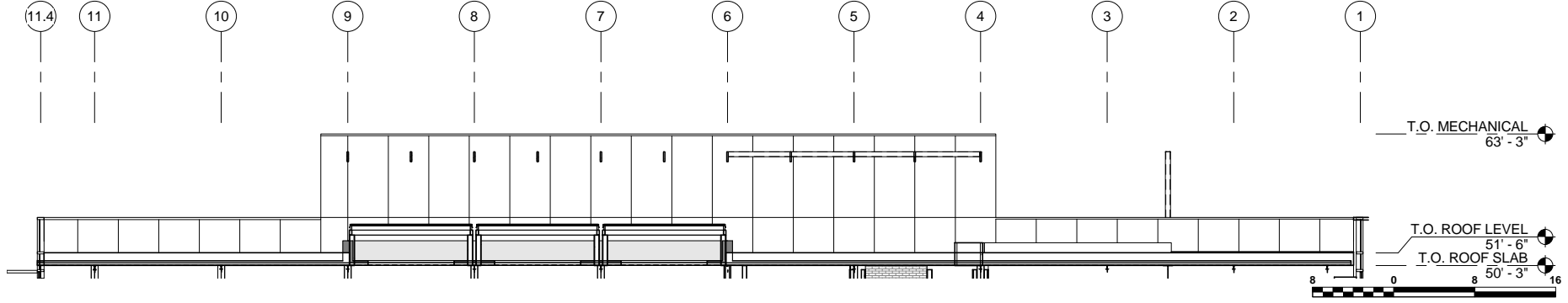


1 EAST EXTERIOR ELEVATION - THE EMBARCADERO
SCALE: 1/8" = 1'-0"

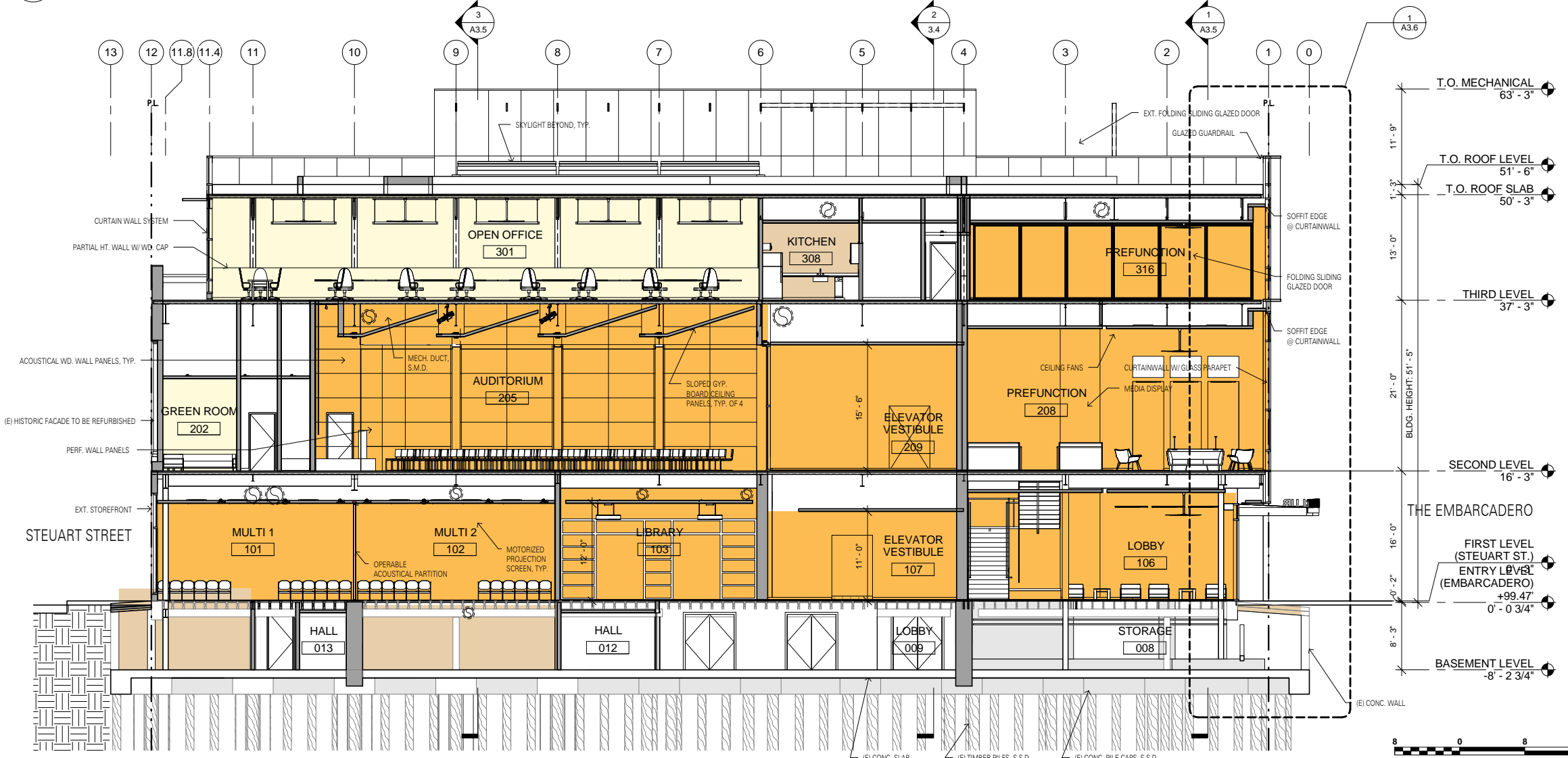


4 ROOF LEVEL - STEUART STREET GUARDRAIL - EAST ELEVATION
A3.3 SCALE: 1/8" = 1'-0"

3 ROOF LEVEL - EMBARCADERO GUARDRAIL - WEST ELEVATION
A3.3 SCALE: 1/8" = 1'-0"

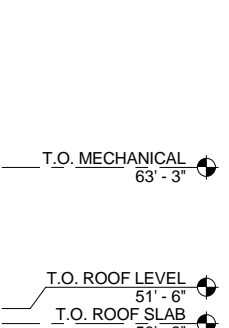
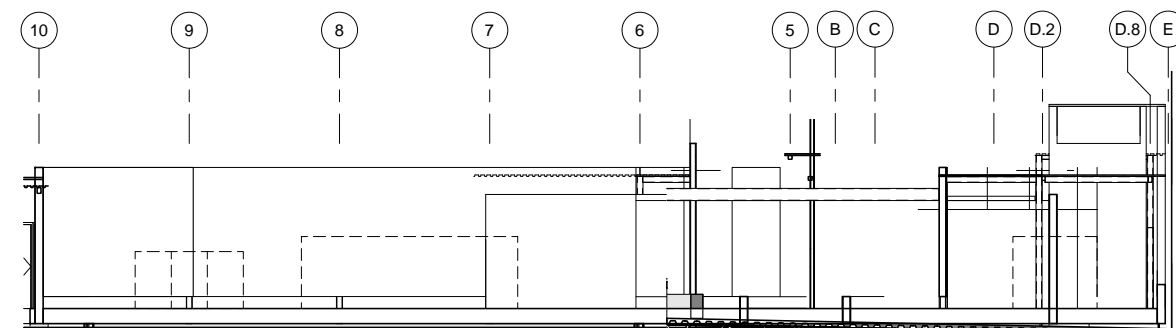
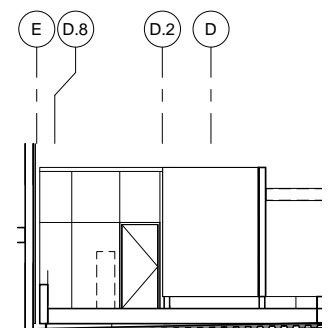
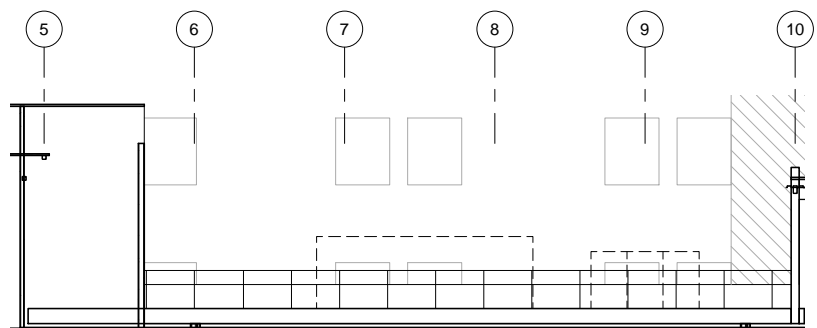


2 ROOF LEVEL - NORTH PARAPET - SOUTH ELEVATION
A3.3 SCALE: 1/8" = 1'-0"



1 BUILDING SECTION LOOKING NORTH
A3.3 SCALE: 1/8" = 1'-0"



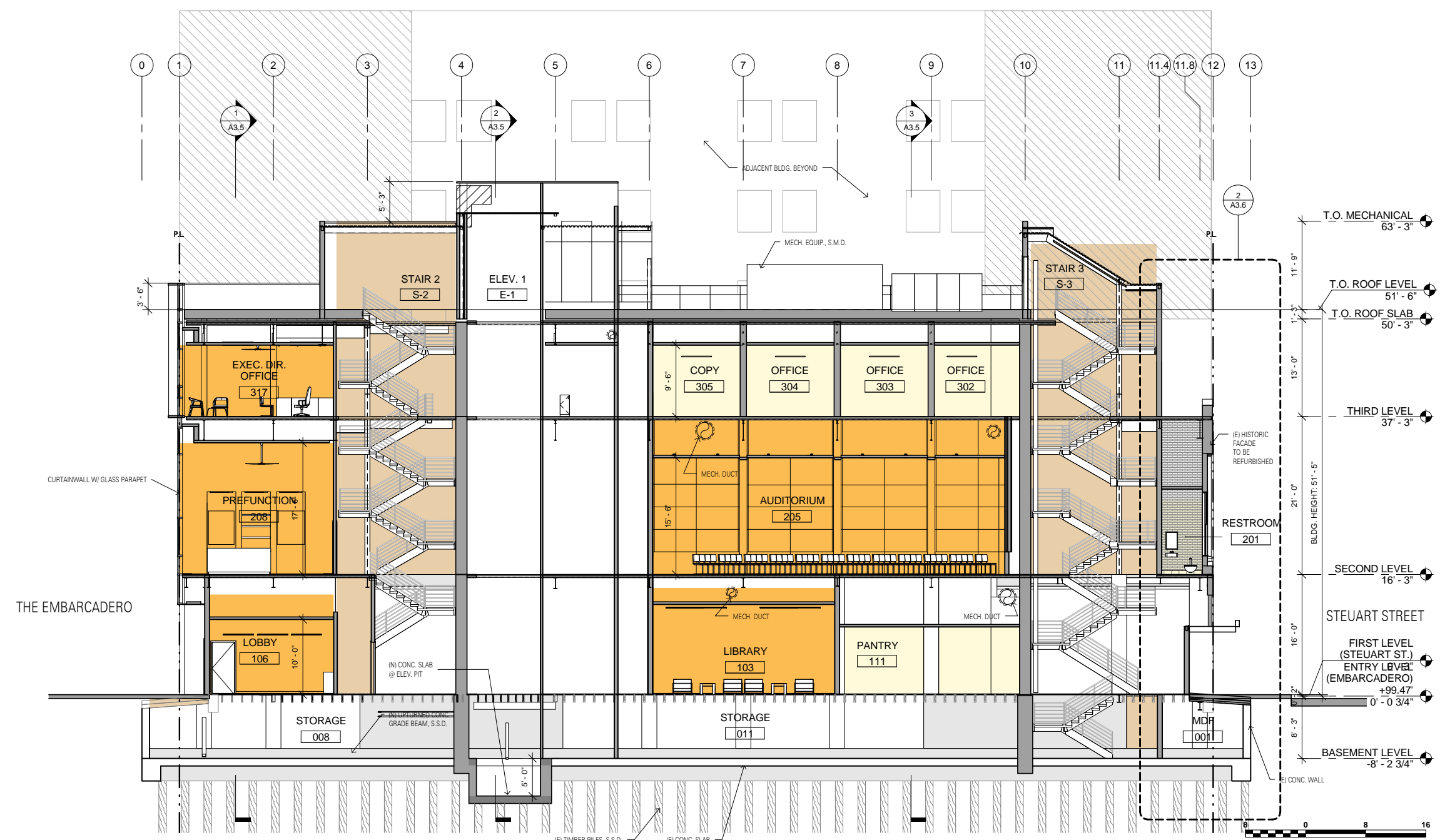


5 MECH. WELL - NORTH ELEVATION
A3.4 SCALE: 1/8" = 1'-0"

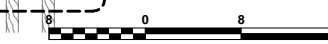
4 MECH. WELL - EAST
A3.4 SCALE: 1/8" = 1'-0"

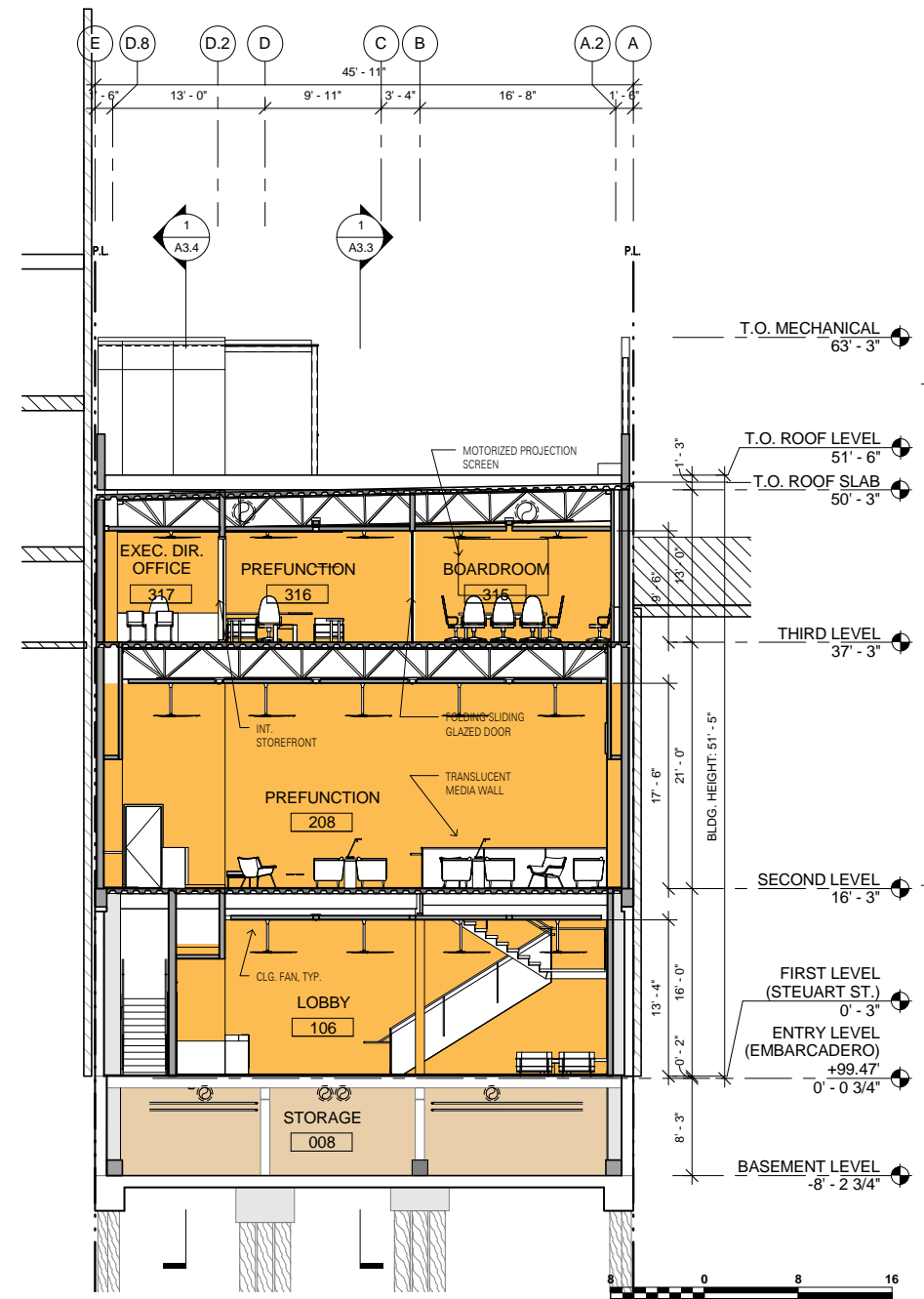
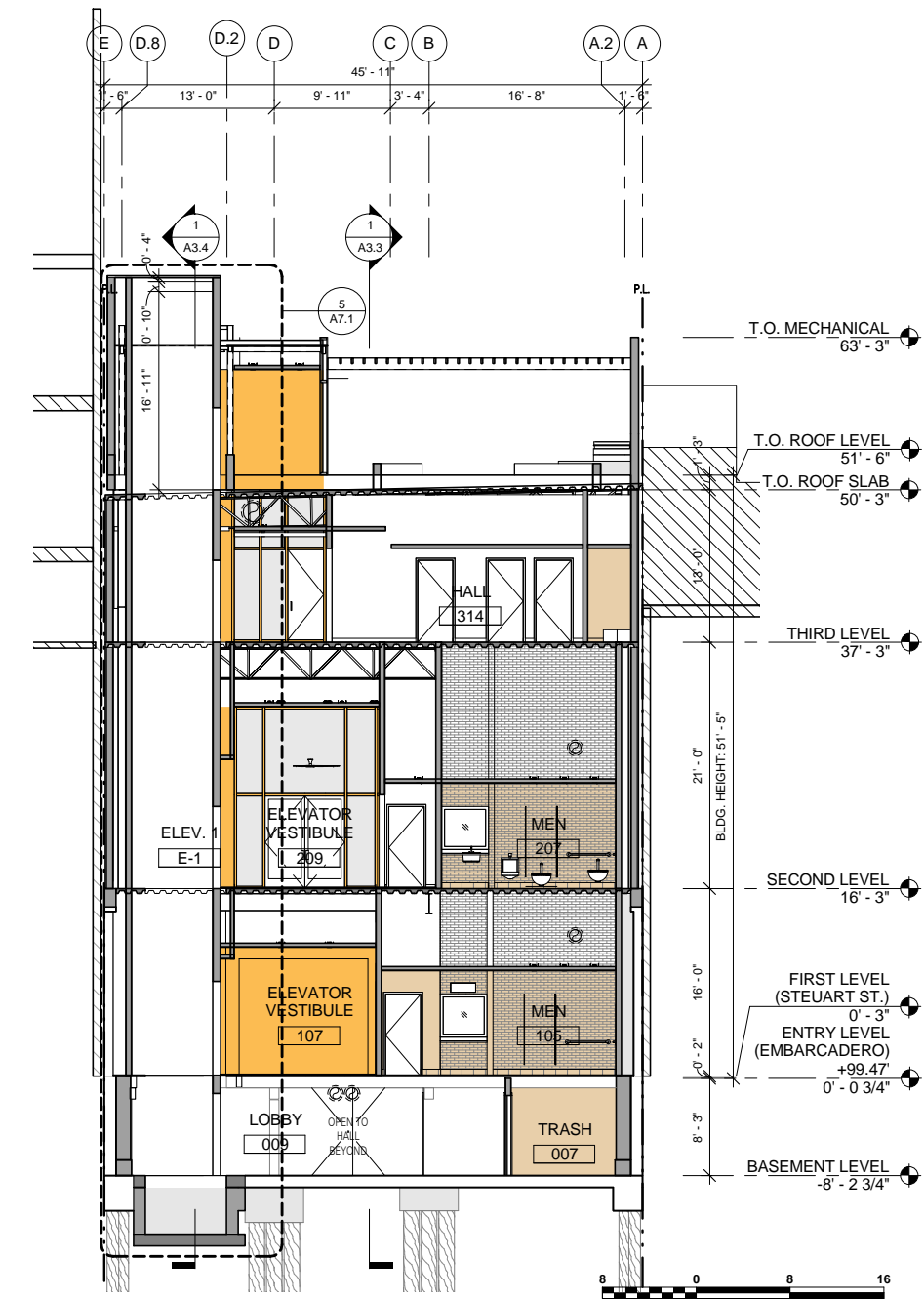
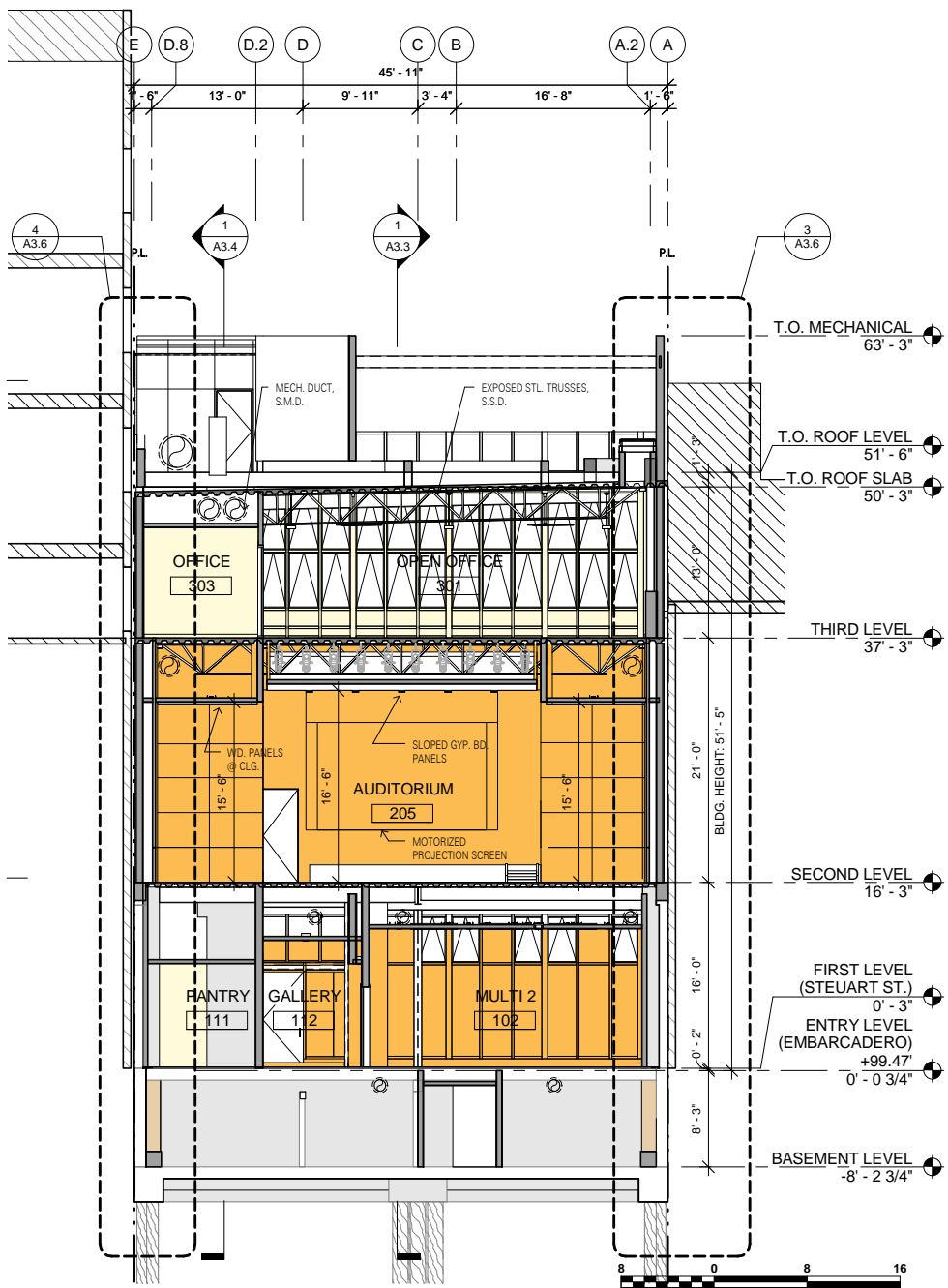
3 MECH. WELL - SOUTH ELEVATION
A3.4 SCALE: 1/8" = 1'-0"

2 MECH. WELL - WEST ELEVATION
A3.4 SCALE: 1/8" = 1'-0"



1 BUILDING SECTION LOOKING SOUTH
A3.4 SCALE: 1/8" = 1'-0"





3 BUILDING SECTION @ AUDITORIUM LOOKING WEST
SCALE: 1/8" = 1'-0"

2 BUILDING SECTION @ ELEVATOR LOOKING WEST
SCALE: 1/8" = 1'-0"

1 BUILDING SECTION @ LOBBY & PREFUNCTION LOOKING WEST
SCALE: 1/8" = 1'-0"



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STEUART STREET HISTORIC PHOTO

15 NOVEMBER 2013



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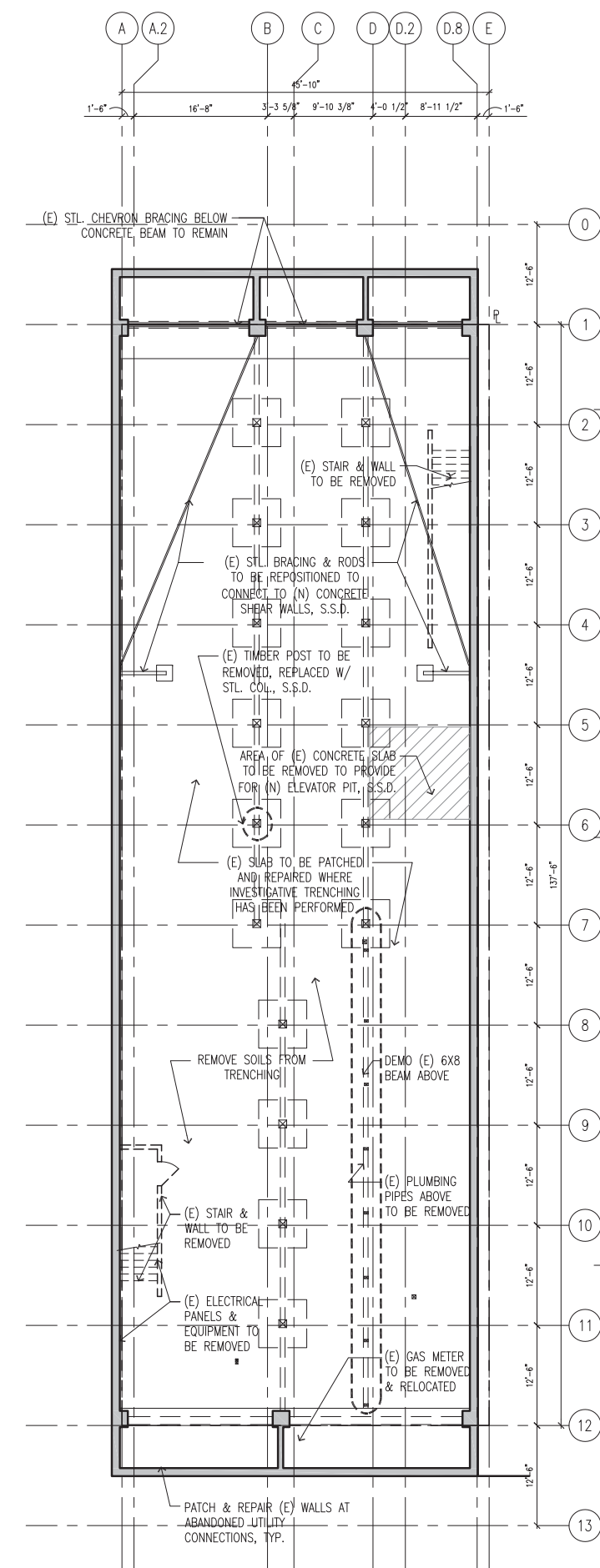
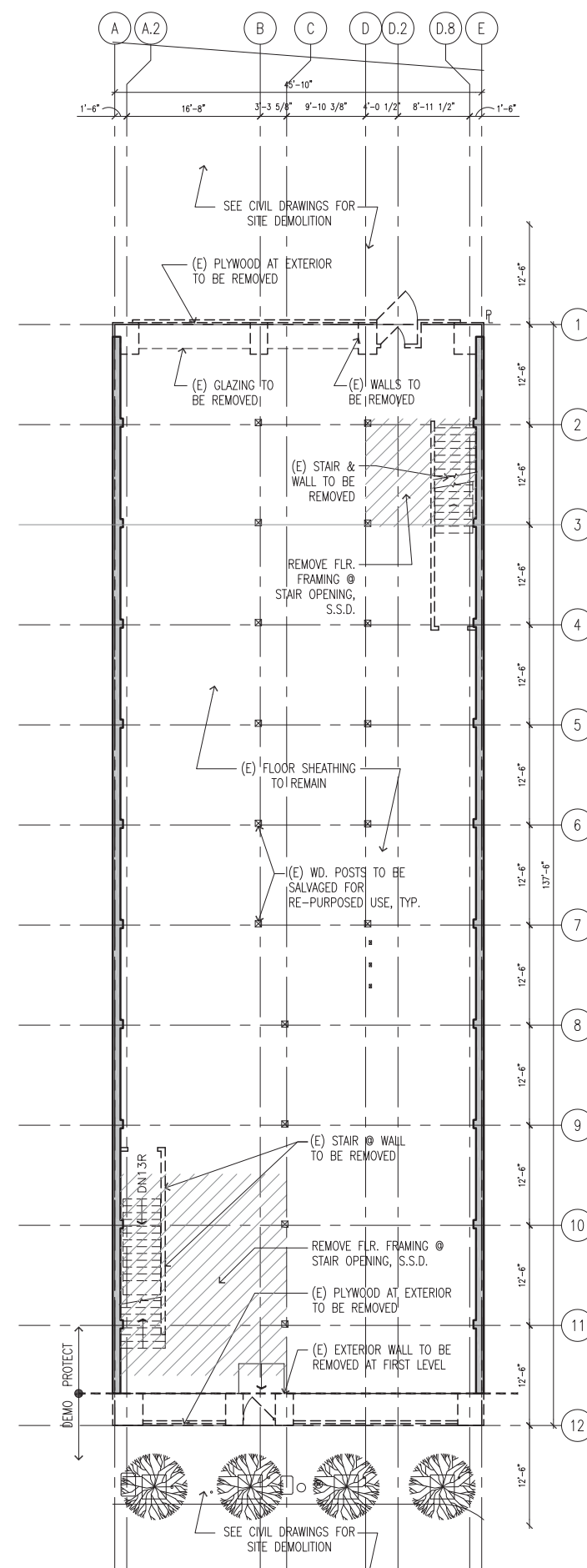
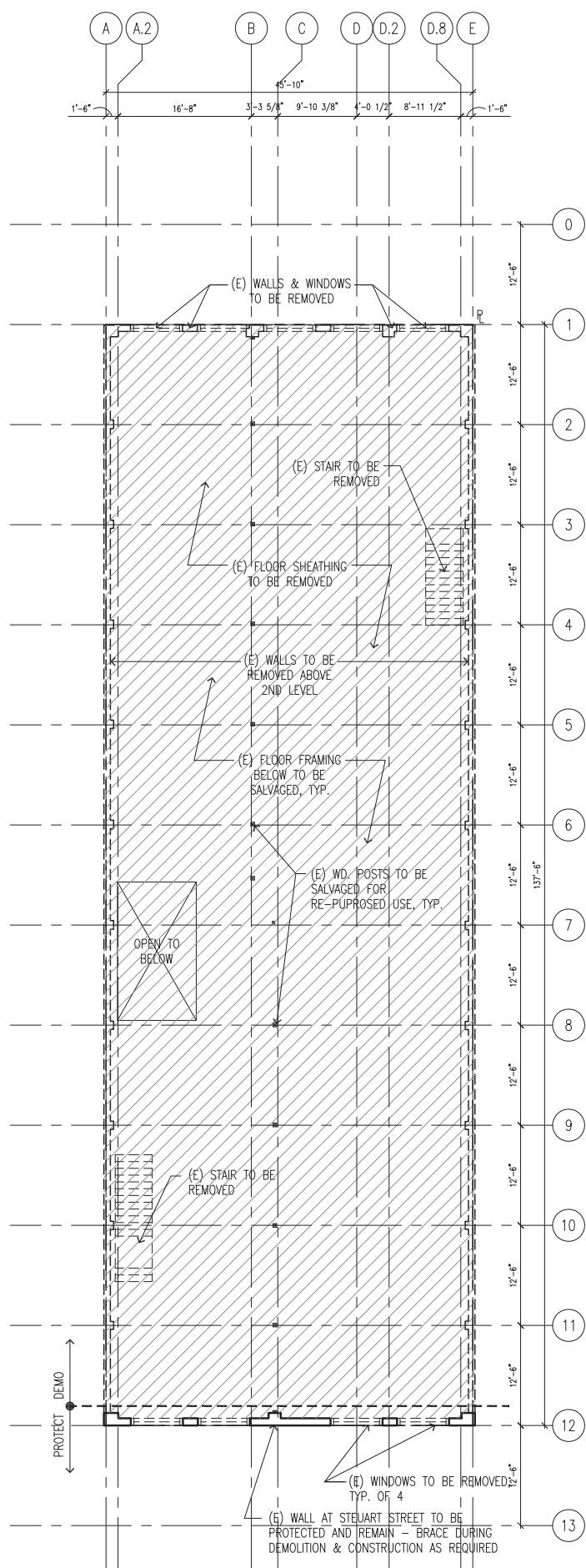
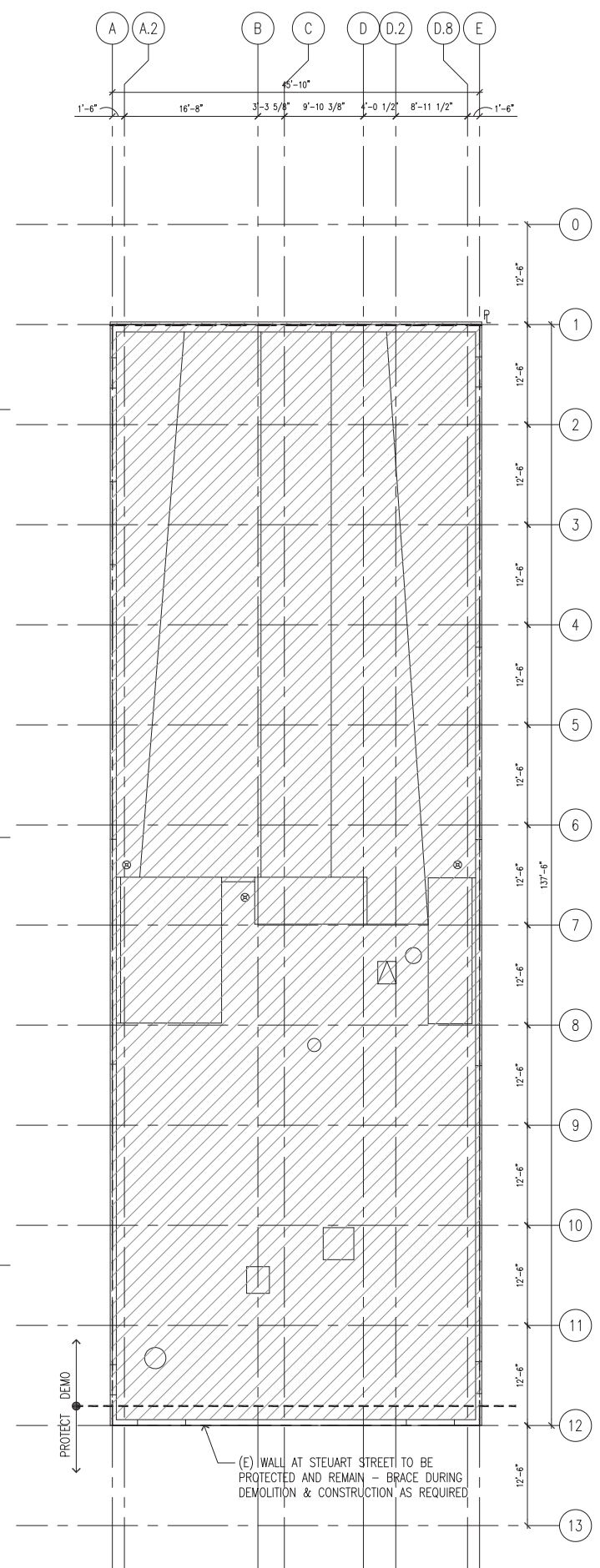
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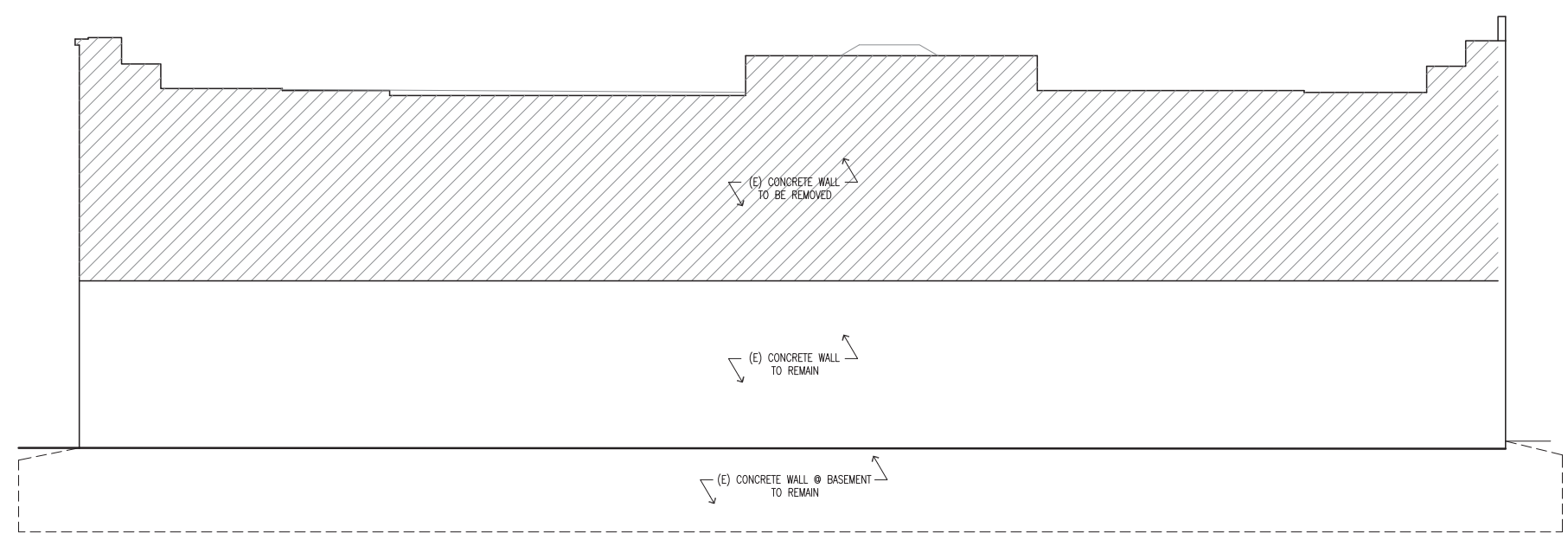


4 ROOF LEVEL DEMOLITION PLAN
A1.1 SCALE: 1" = 10'-0"

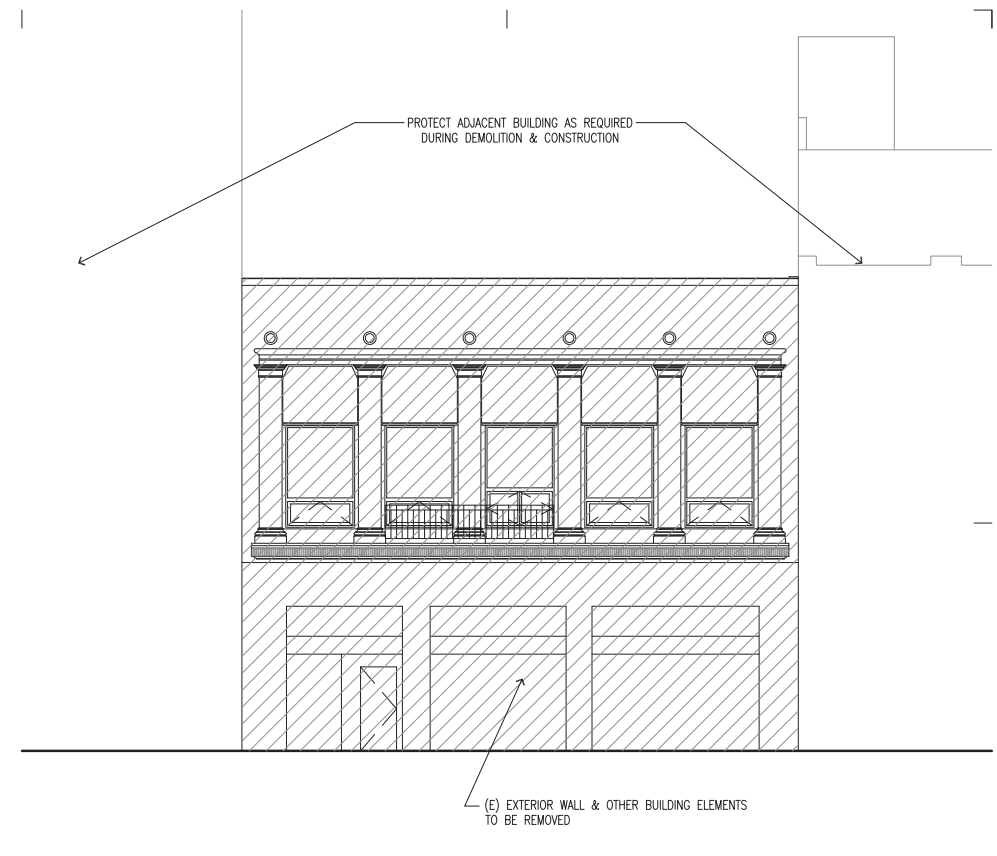
3 SECOND LEVEL DEMOLITION PLAN
A1.1 SCALE: 1" = 10'-0"

2 FIRST LEVEL DEMOLITION PLAN
A1.1 SCALE: 1" = 10'-0"

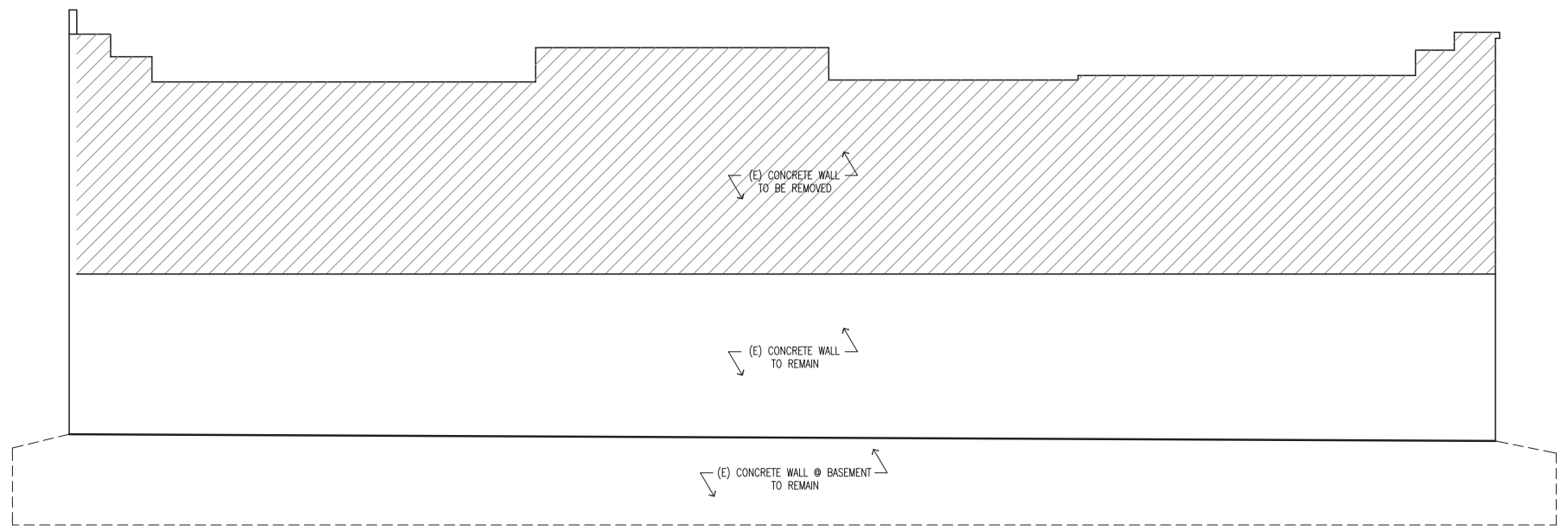
1 BASEMENT LEVEL DEMOLITION PLAN
A1.1 SCALE: 1" = 10'-0"



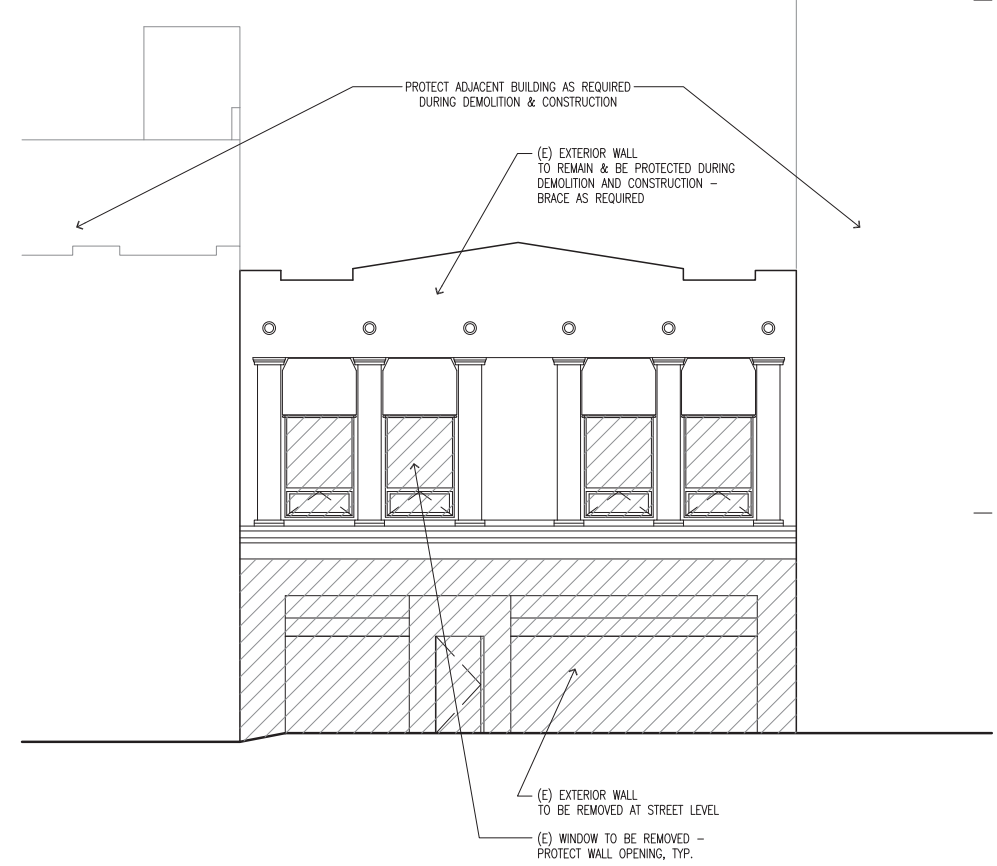
4 NORTH DEMOLITION EXTERIOR ELEVATION
SCALE: 1/8" = 1'-0"



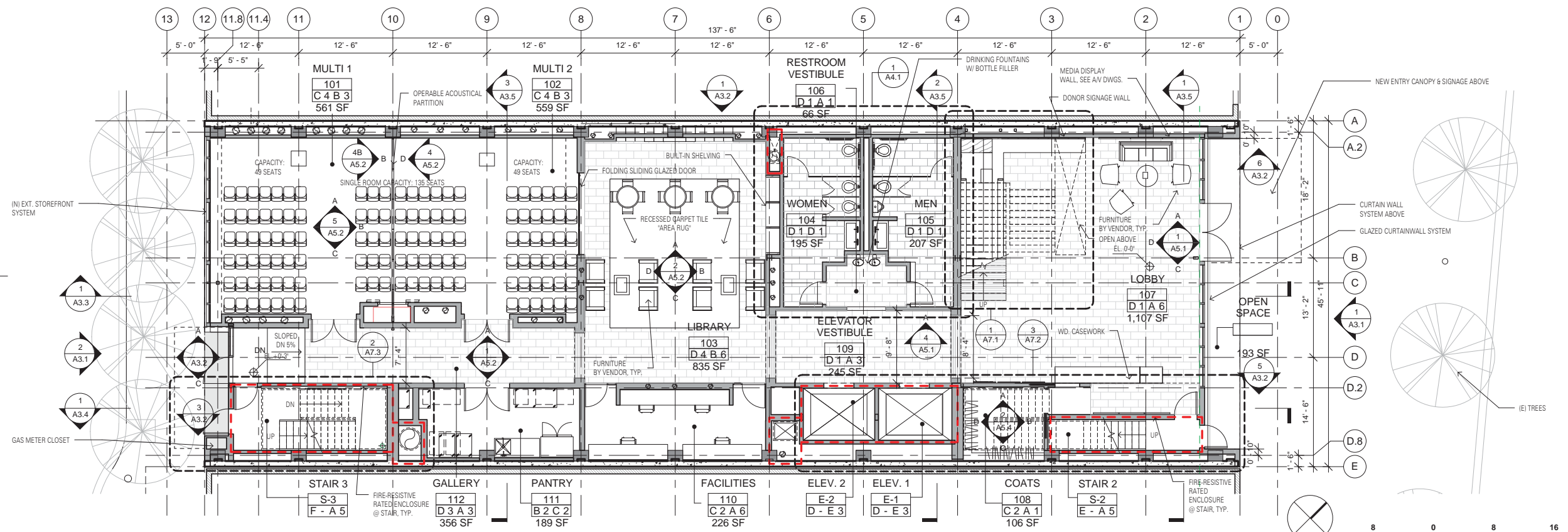
2 THE EMBARCADERO DEMOLITION EXTERIOR ELEVATION
SCALE: 1/8" = 1'-0"



3 SOUTH DEMOLITION EXTERIOR ELEVATION
SCALE: 1/8" = 1'-0"



1 STEUART STREET DEMOLITION EXTERIOR ELEVATION
SCALE: 1/8" = 1'-0"

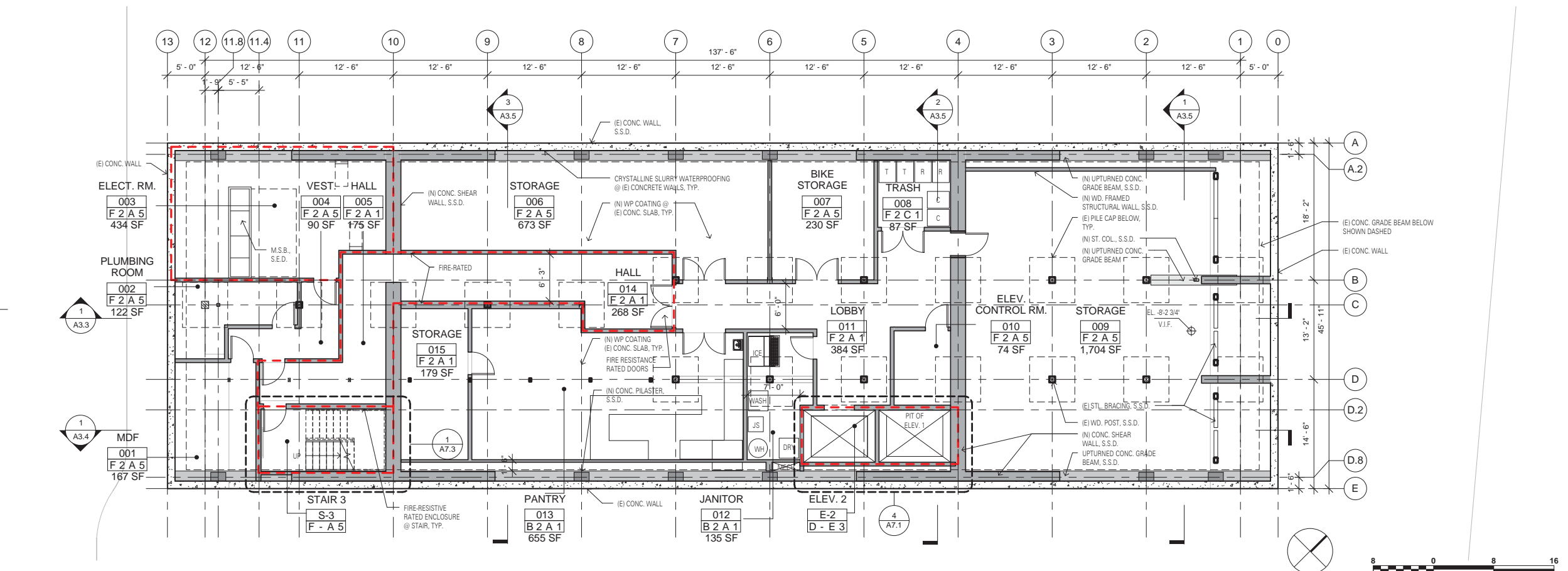


FINISH KEY	
	FLOOR
	BASE
	WALL
	CEILING
FLOOR	
A.	HARDWOOD FLOOR
B.	POURED EPOXY
C.	CARPET TILE
D.	TILE
E.	RESILIENT FLOORING
F.	CONCRETE
BASE	
1.	TILE
2.	RUBBER
3.	WOOD
4.	PERFORATED METAL WAINSCOT (PTD.)
WALL	
A.	GYP. BD. (PTD.)
B.	WOOD ACOUSTIC PANELS
C.	FRP
D.	TILE
E.	WOOD PANELS
CEILING	
1.	GYP. BD. (PTD.)
2.	ACOUSTIC TILE (2 x 2)
3.	ACOUSTIC PANELS (4 x 5)
4.	EXPOSED ACOUSTIC MTL. DECK
5.	EXPOSED STRUCTURE ABOVE
6.	ACOUSTIC FABRIC CEILING
7.	CEM. BD. PANELS

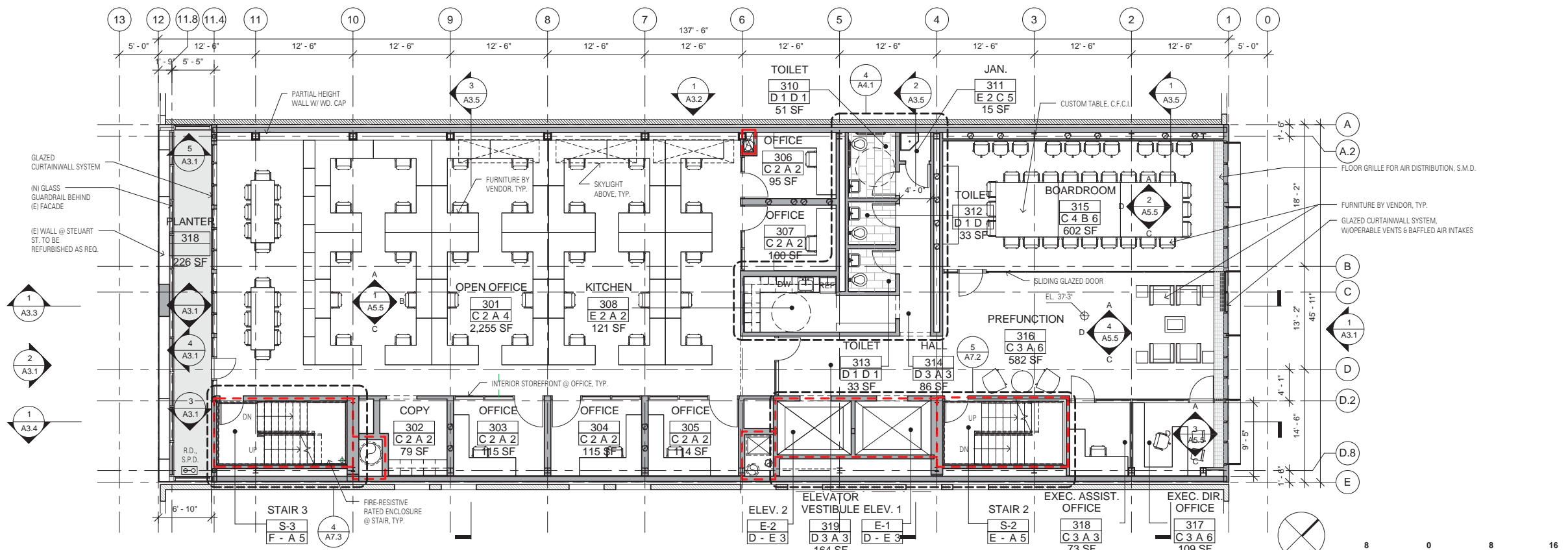
LEGEND	
	1 HR. PARTITION
	(E) CONC. WALL
	(N) CONC. WALL
	(N) PARTITION

BASEMENT LEGEND	
	EXISTING TIMBER COLUMNS
	LOW CLG. CLEARANCE BELOW SIDEWALK

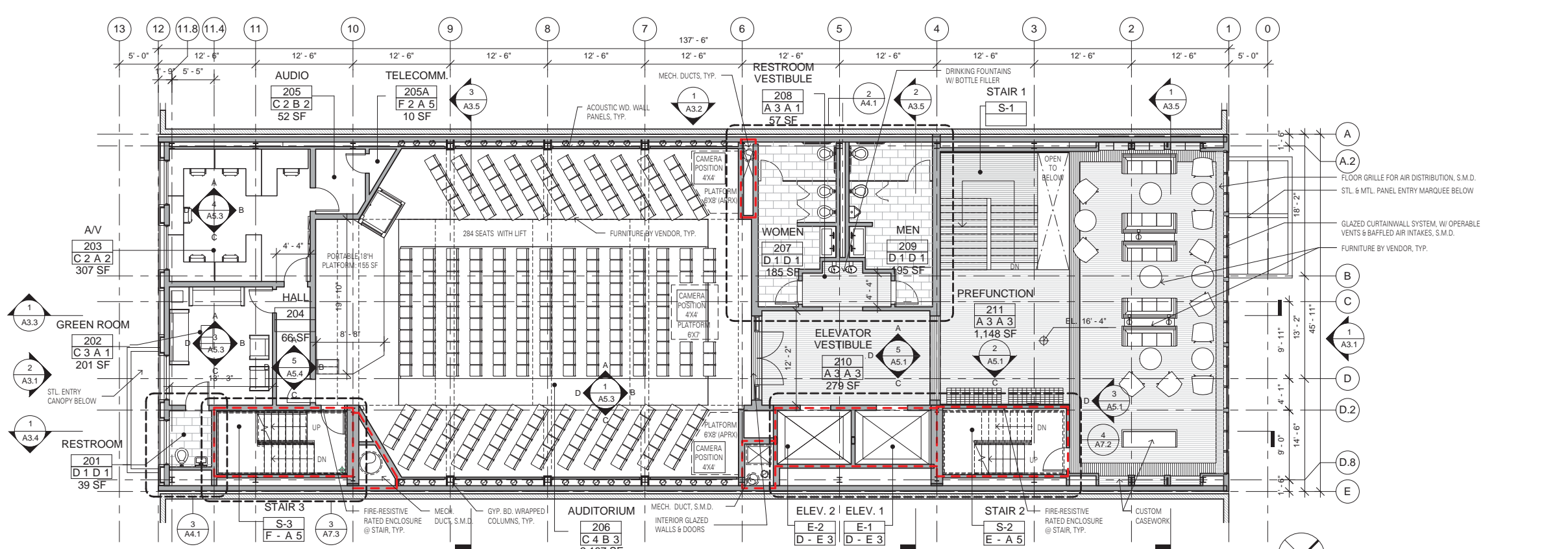
2 FIRST LEVEL FLOOR PLAN
SCALE: 1/8" = 1'-0"



1 BASEMENT LEVEL FLOOR PLAN
SCALE: 1/8" = 1'-0"



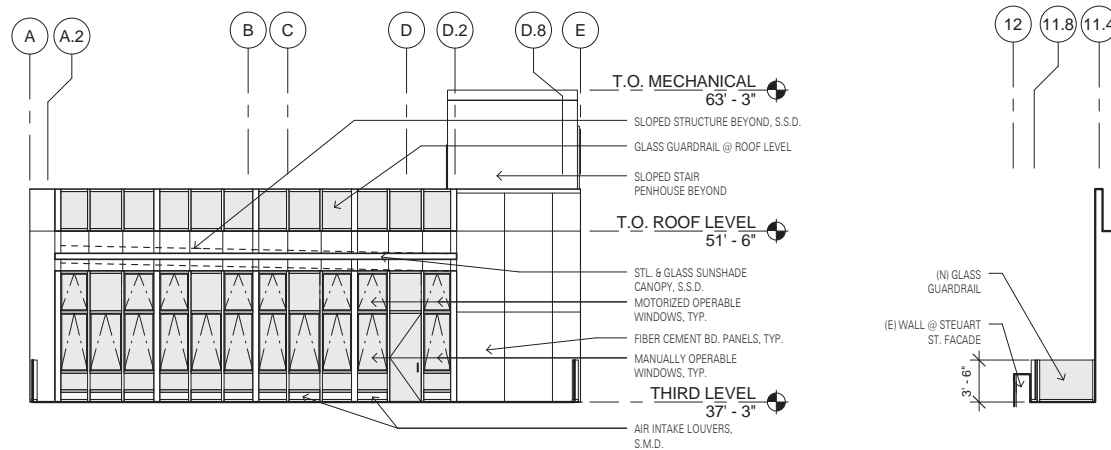
2 THIRD LEVEL FLOOR PLAN
 SCALE: 1/8" = 1'-0"



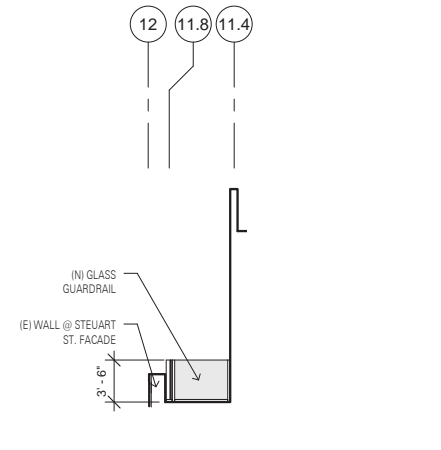
1 SECOND LEVEL FLOOR PLAN
 SCALE: 1/8" = 1'-0"

EXTERIOR ELEVATION LEGEND	
	WHL TYPE TAG
	CLEAR GLASS
	FIBER CEMENT BOARD
	XXX

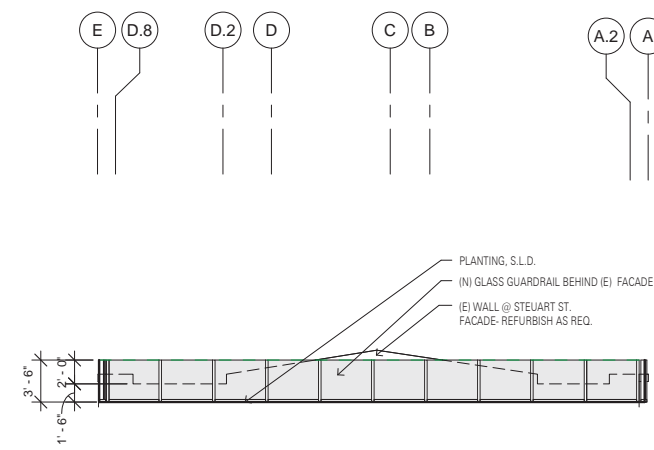
EXTERIOR ELEVATION SHEET NOTES	
1.	
2.	
3.	



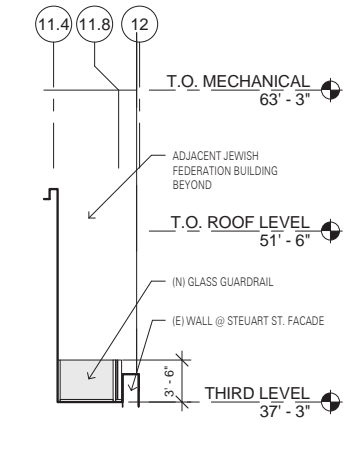
6 THIRD LEVEL PLANTER - WEST ELEVATION
A3.1 SCALE: 1/8" = 1'-0"



5 THIRD LEVEL PLANTER - SOUTH ELEVATION
A3.1 SCALE: 1/8" = 1'-0"



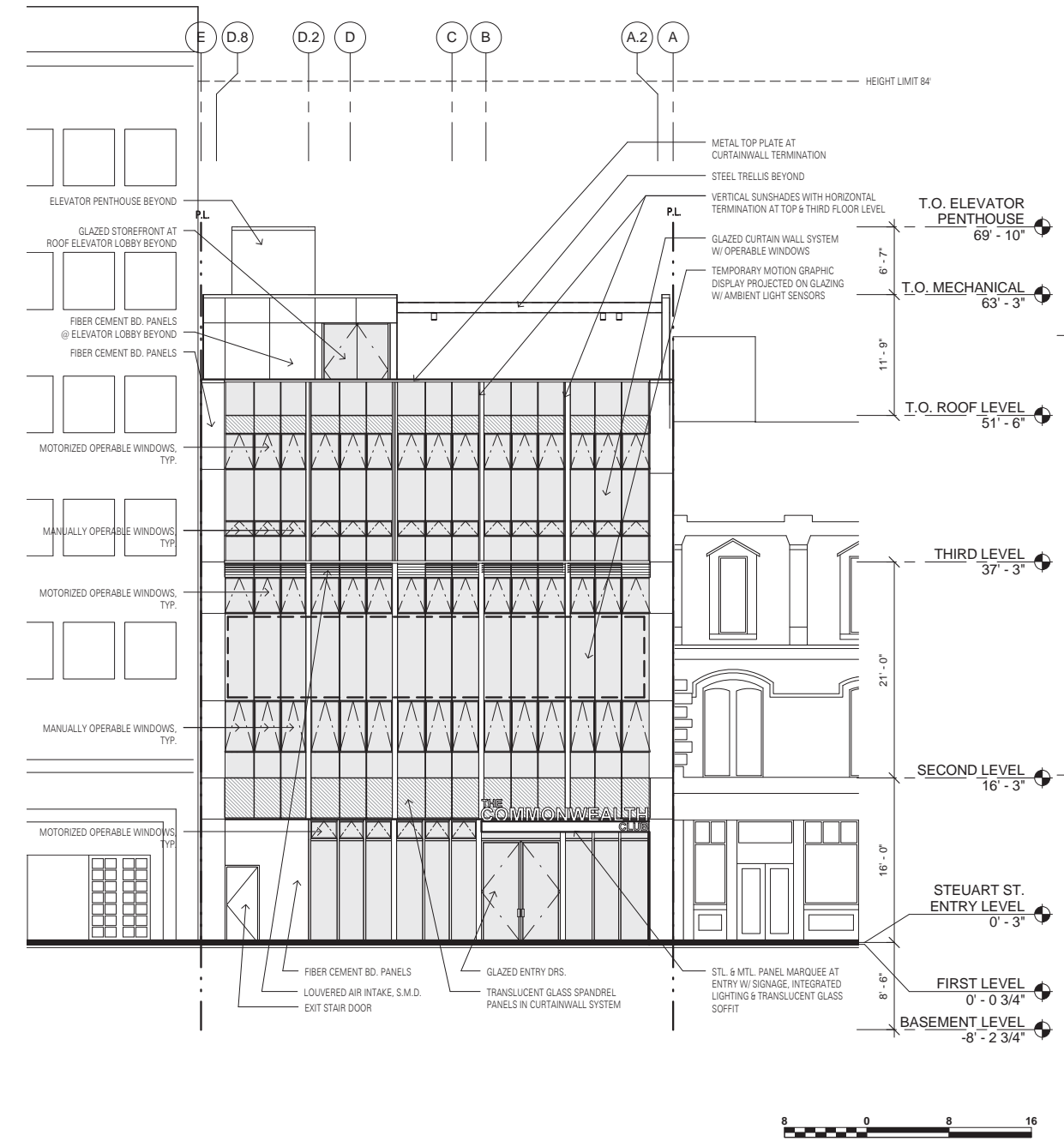
4 THIRD LEVEL PLANTER - EAST ELEVATION
A3.1 SCALE: 1/8" = 1'-0"



3 THIRD LEVEL PLANTER - NORTH ELEVATION
A3.1 SCALE: 1/8" = 1'-0"



2 WEST EXTERIOR ELEVATION - STEUART STREET
A3.1 SCALE: 1/8" = 1'-0"



1 EAST EXTERIOR ELEVATION - THE EMBARCADERO
A3.1 SCALE: 1/8" = 1'-0"



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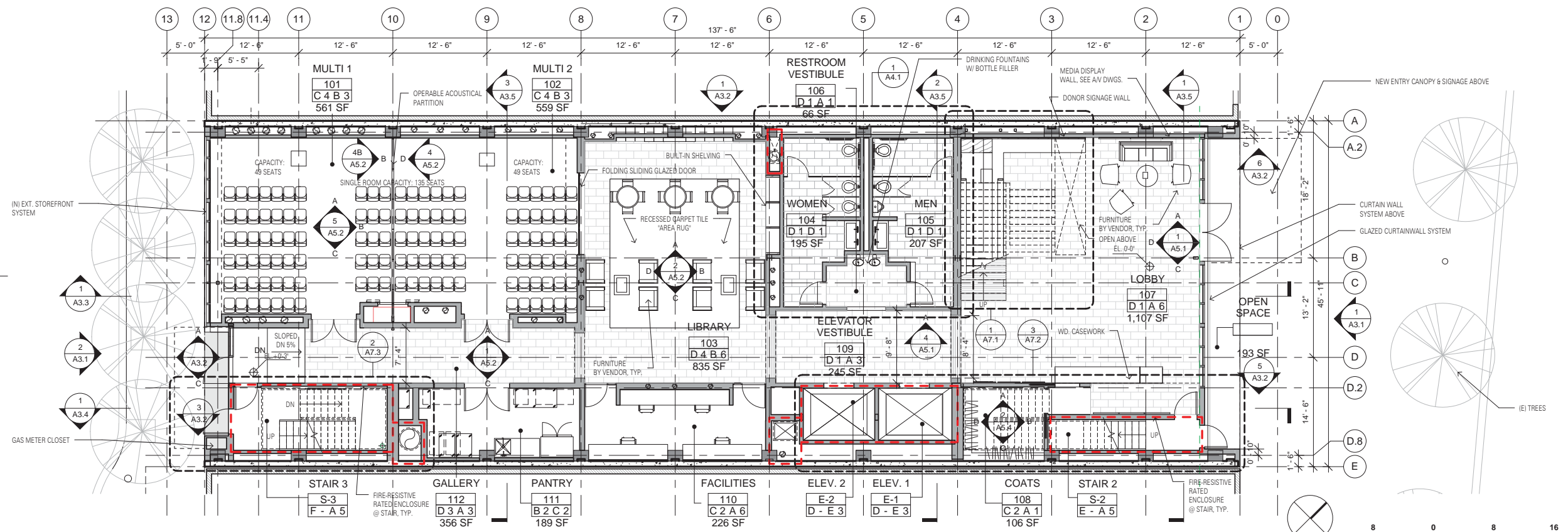
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STEUART STREET PREVIOUS DESIGN

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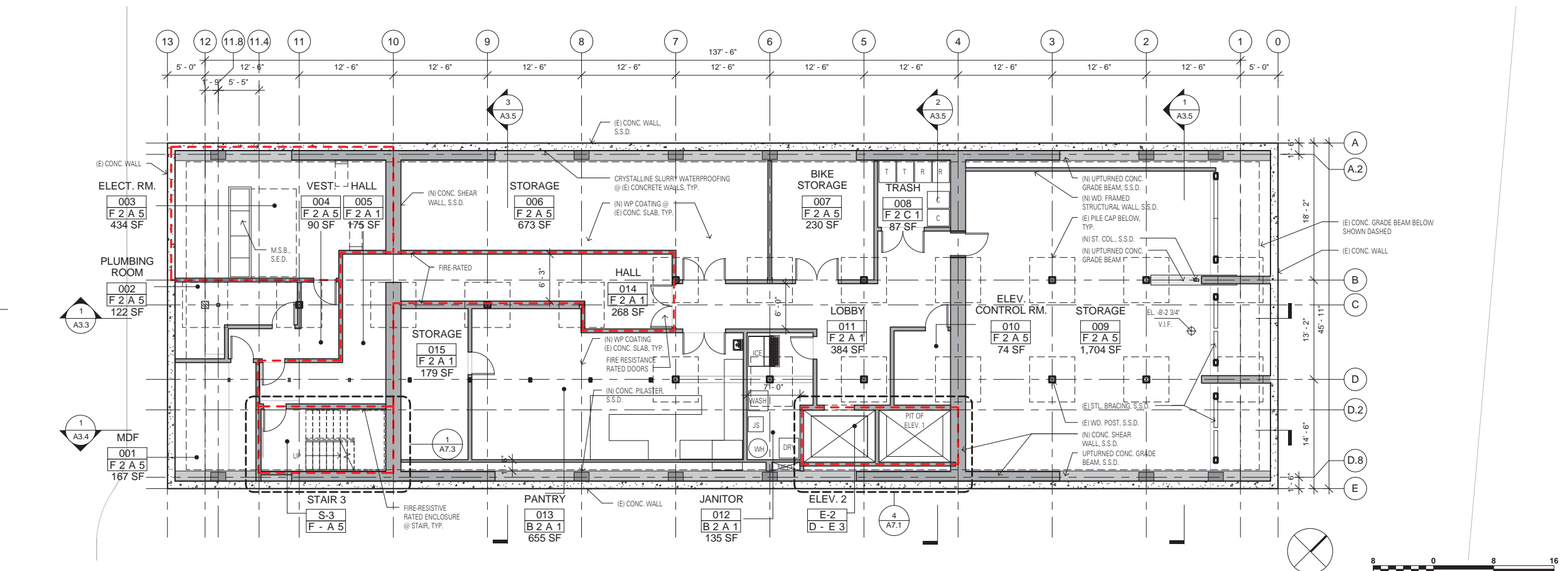


FINISH KEY	
	FLOOR
	BASE
	WALL
	CEILING
FLOOR	
A.	HARDWOOD FLOOR
B.	POURED EPOXY
C.	CARPET TILE
D.	TILE
E.	RESILIENT FLOORING
F.	CONCRETE
BASE	
1.	TILE
2.	RUBBER
3.	WOOD
4.	PERFORATED METAL WAINSCOT (PTD.)
WALL	
A.	GYP. BD. (PTD.)
B.	WOOD ACOUSTIC PANELS
C.	FRP
D.	TILE
E.	WOOD PANELS
CEILING	
1.	GYP. BD. (PTD.)
2.	ACOUSTIC TILE (2 x 2)
3.	ACOUSTIC PANELS (4 x 5)
4.	EXPOSED ACOUSTIC MTL. DECK
5.	EXPOSED STRUCTURE ABOVE
6.	ACOUSTIC FABRIC CEILING
7.	CEM. BD. PANELS

LEGEND	
	1 HR. PARTITION
	(E) CONC. WALL
	(N) CONC. WALL
	(N) PARTITION

BASEMENT LEGEND	
	EXISTING TIMBER COLUMNS
	LOW CLG. CLEARANCE BELOW SIDEWALK

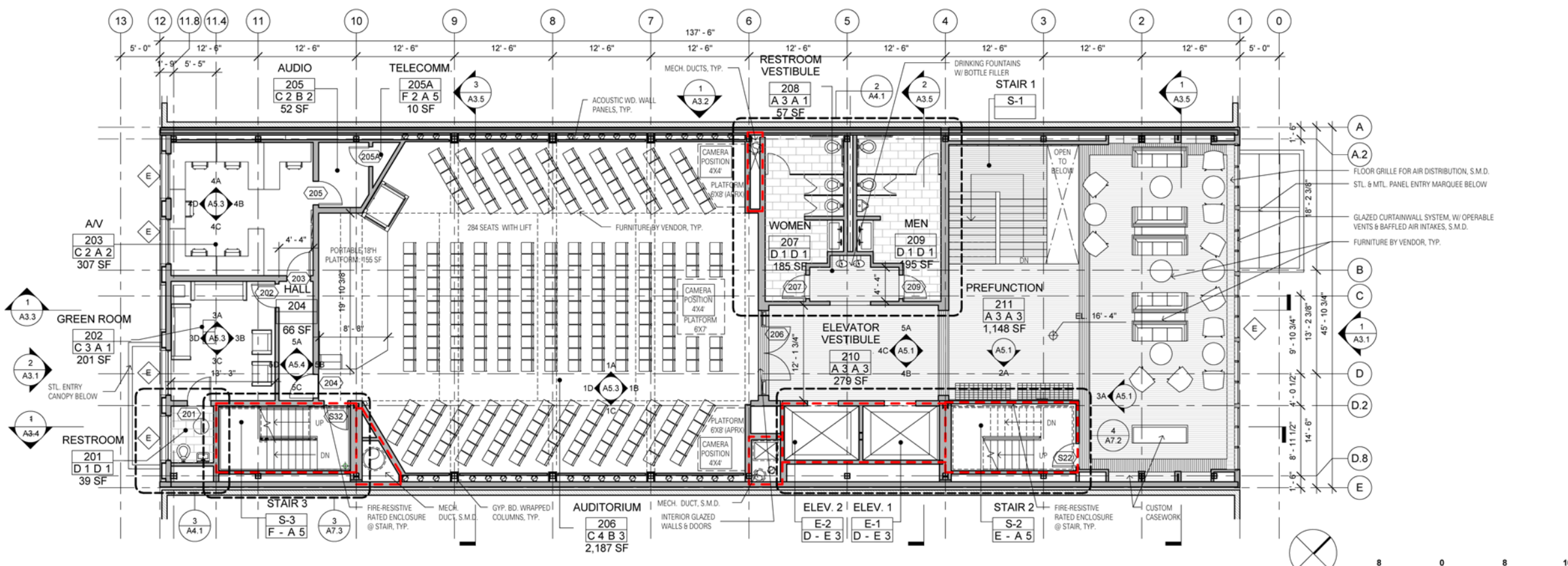
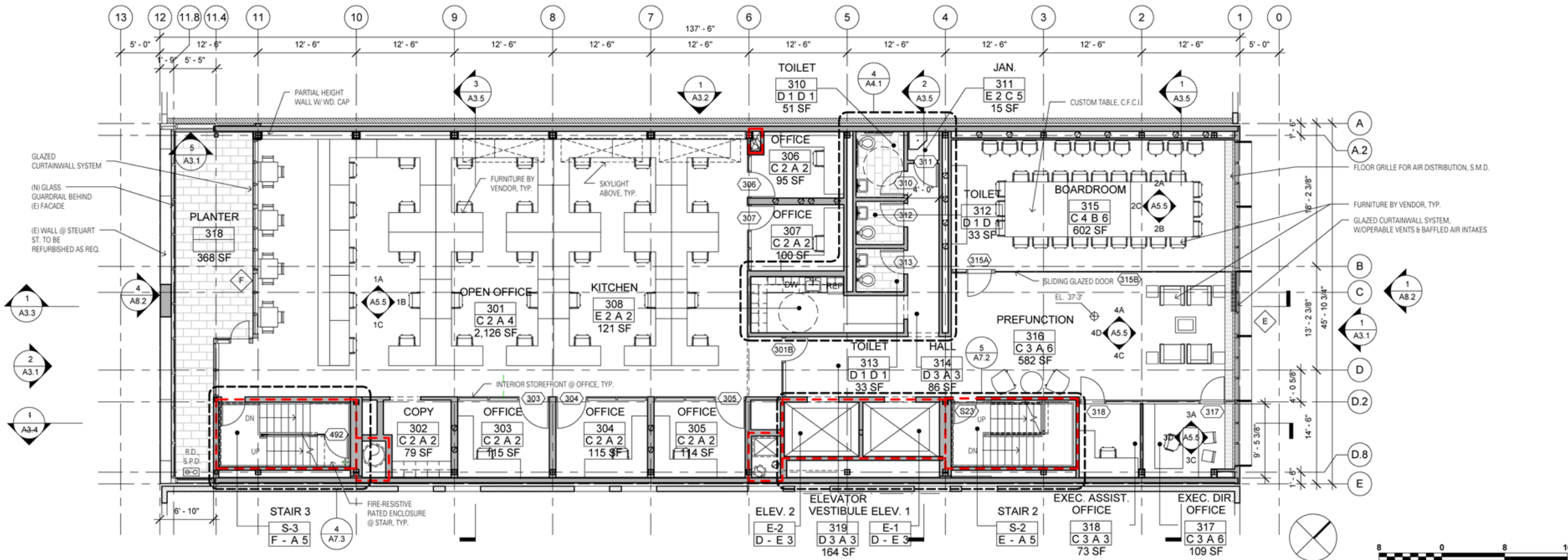
2 FIRST LEVEL FLOOR PLAN
SCALE: 1/8" = 1'-0"



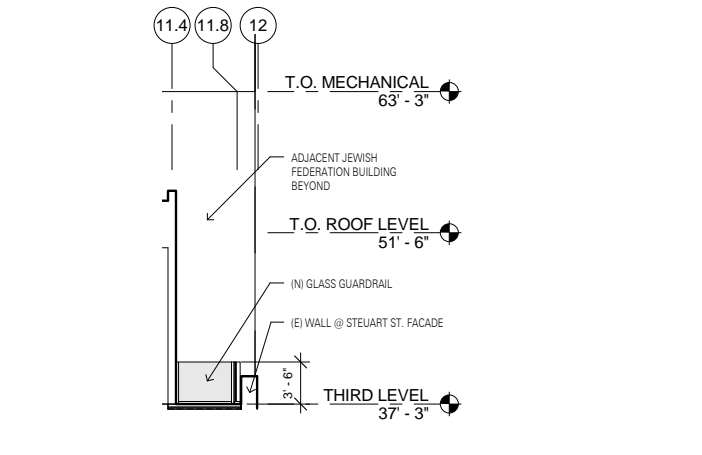
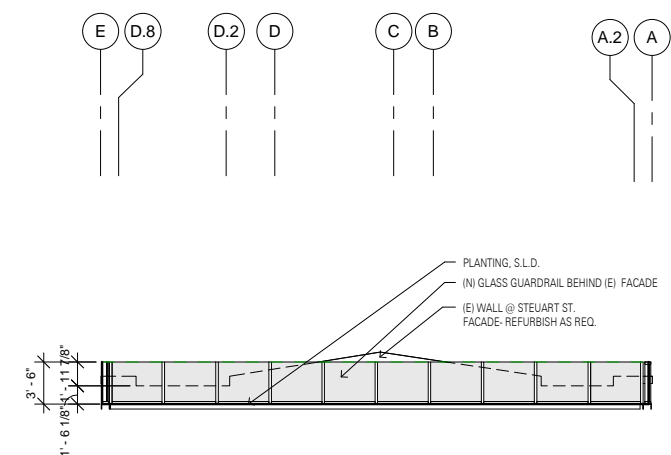
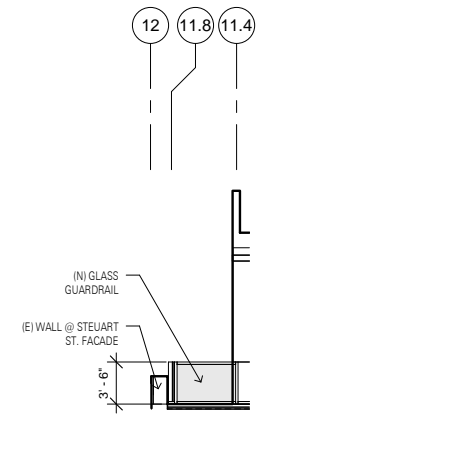
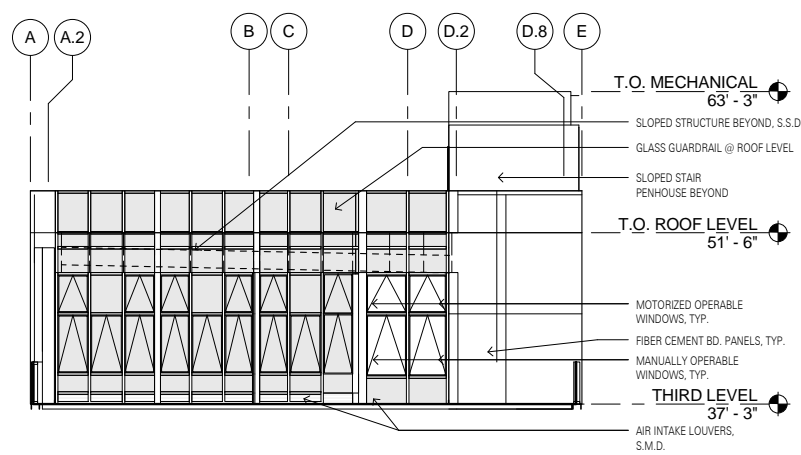
1 BASEMENT LEVEL FLOOR PLAN
SCALE: 1/8" = 1'-0"

FINISH KEY	
FLOOR	A1 A1 A1
BASE	
WALL	
CEILING	
FLOOR	
A.	HARDWOOD FLOOR
B.	POURED EPOXY
C.	CARPET TILE
D.	TILE
E.	RESILIENT FLOORING
F.	CONCRETE
BASE	
1.	TILE
2.	RUBBER
3.	WOOD
4.	PERFORATED METAL WAINSCOT (PTD.)
WALL	
A.	GYP. BD. (PTD.)
B.	WOOD ACOUSTIC PANELS
C.	FRP
D.	TILE
E.	WOOD PANELS
CEILING	
1.	GYP. BD. (PTD.)
2.	ACOUSTIC TILE (2' x 2')
3.	ACOUSTIC PANELS (4' x 5')
4.	EXPOSED ACOUSTIC MTL. DECK
5.	EXPOSED STRUCTURE ABOVE
6.	ACOUSTIC FABRIC CEILING
7.	CEM. BD. PANELS

LEGEND	
	1 HR. PARTITION
	(E) CONC. WALL
	(N) CONC. WALL
	(N) PARTITION



REVISED PER 11.15.13

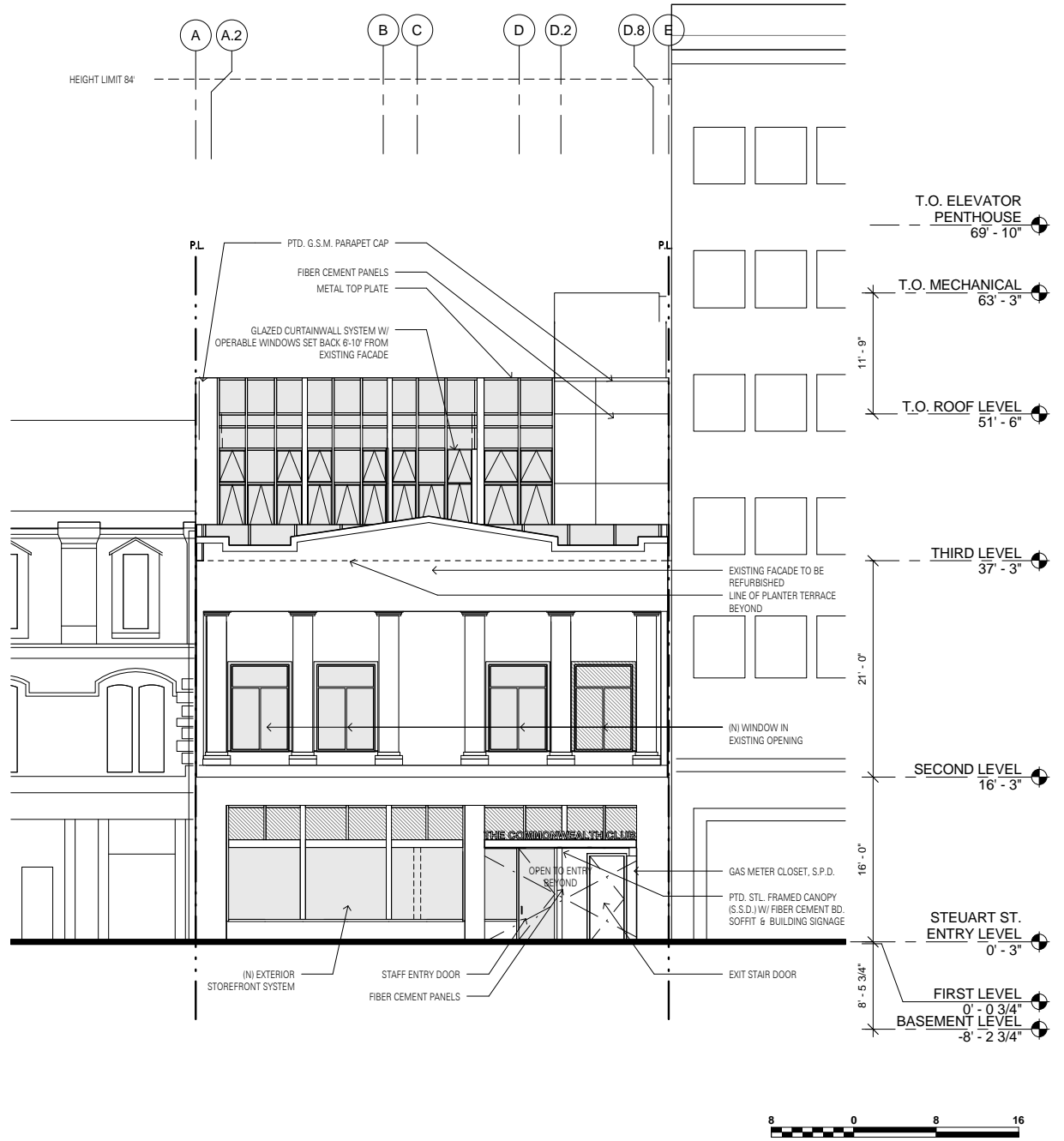


6 THIRD LEVEL PLANTER - WEST ELEVATION
A3.1 SCALE: 1/8" = 1'-0"

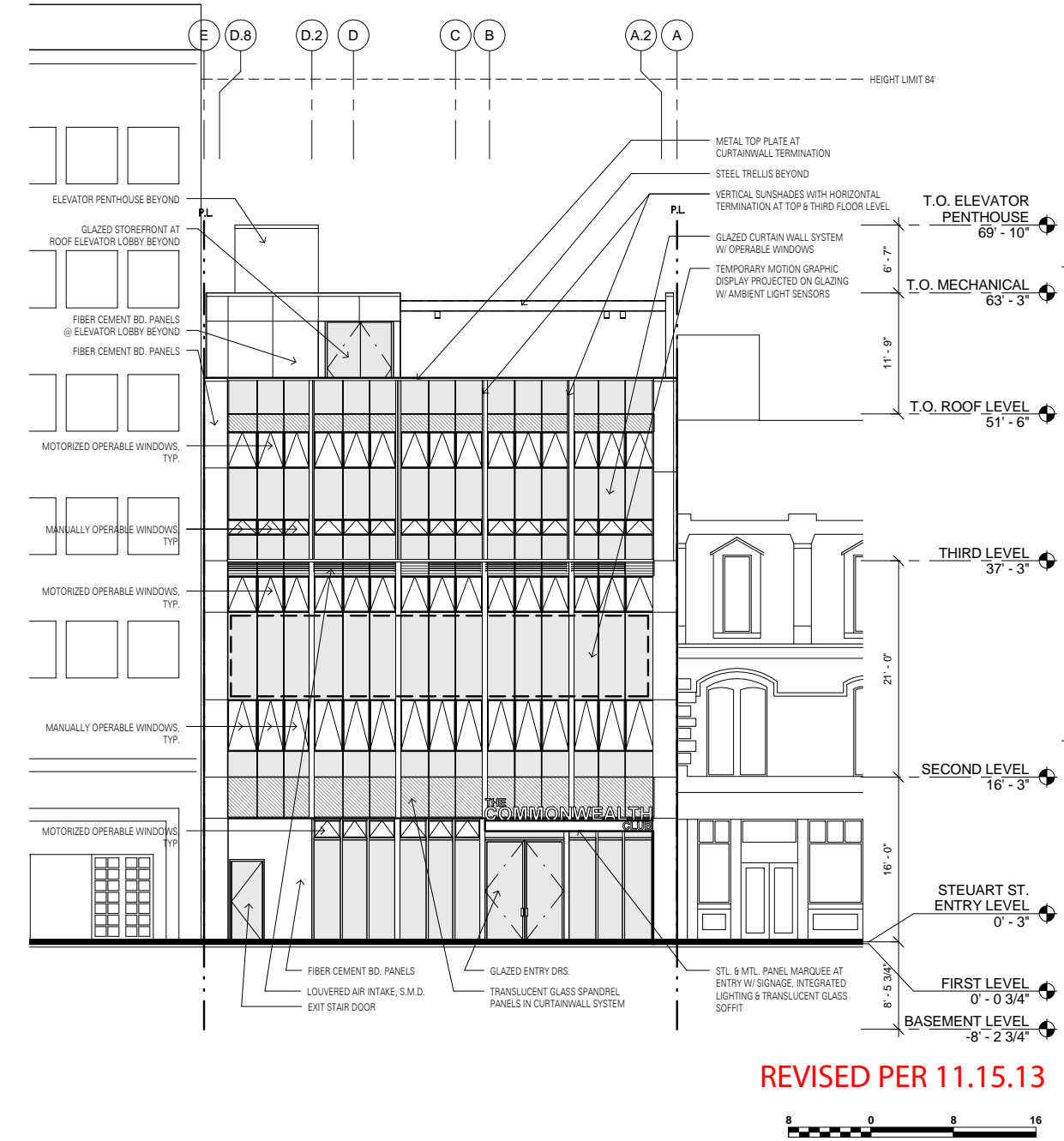
5 THIRD LEVEL PLANTER - SOUTH ELEVATION
A3.1 SCALE: 1/8" = 1'-0"

4 THIRD LEVEL PLANTER - EAST ELEVATION
A3.1 SCALE: 1/8" = 1'-0"

3 THIRD LEVEL PLANTER - NORTH ELEVATION
A3.1 SCALE: 1/8" = 1'-0"



2 WEST EXTERIOR ELEVATION - STEUART STREET
A3.1 SCALE: 1/8" = 1'-0"



1 EAST EXTERIOR ELEVATION - THE EMBARCADERO
A3.1 SCALE: 1/8" = 1'-0"

REVISED PER 11.15.13



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STEUART STREET PROPOSED

REVISED PER 11.15.13

15 NOVEMBER 2013



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