



ADDENDUM 1 TO ENVIRONMENTAL IMPACT REPORT

Date of Publication of Addendum: October 10, 2024
Date of EIR Certification: September 5, 2019
EIR Case No. **2015-014028ENV**
Project Title: **3333 California Street Mixed-Use Project**
Modified Project Case No.: **2015-014028ENV-02**
Block/Lot: 1032/003
Project Sponsor: Don Bragg, Laurel Heights Partners, LLC
(415) 857-9324
Lead Agency: San Francisco Planning Department
Staff Contact: Debra Dwyer – (628) 652-7576
debra.dwyer@sfgov.org

Remarks

Background

On September 5, 2019, the San Francisco Planning Commission certified a final environmental impact report (EIR) for the 3333 California Street Mixed Use Project under Motion No. 20512 in fulfillment of the requirements of the California Environmental Quality Act (CEQA).¹ The San Francisco Board of Supervisor’s upheld the EIR certification on appeal on November 12, 2019. The City and County of San Francisco decided to carry out or approve the project on November 27, 2019.² Revisions and clarifications to the project and project variant were provided as part of the Responses to Comments document (RTC) and an Errata memorandum provided for the certification hearing. The project approved September 5, 2019 is the project variant described (EIR Vol. 2, pp. 2.1 – 2.6, RTC Table 2.6) and analyzed in the RTC (EIR Vol. 2, pp. 2.29 – 2.47, pp. 6.6-6.30).³

Project site redevelopment includes a shift from office, research, childcare, landscaped open space, and parking uses to a mix of residential, retail, childcare, open space, and parking uses. The existing 455,000-gross-square-foot office building will be partially demolished and adaptively reused for residential use as two separate buildings (“Center Building A” and “Center Building B”) with up to three stories added to each

¹ San Francisco Planning Department, *3333 California Street Mixed-Use Project Final Environmental Impact Report*, Planning Department Case No. 2015-014028ENV, State Clearinghouse No. 2017092053, certified September 5, 2019. Available online at: [Environmental Review Documents | SF Planning](#), accessed August 2024.

² San Francisco Planning Department, *3333 California Street Mixed-Use Project Notice of Determination*, Planning Department Case No. 2015-014028ENV, State Clearinghouse No. 2017092053, certified December 2, 2019. Available online at: [Environmental Review Documents | SF Planning](#), accessed September 2024.

³ San Francisco Planning Department, *3333 California Street Mixed-Use Project Final Environmental Impact Report*, Planning Department Case No. 2015-014028ENV, State Clearinghouse No. 2017092053, certified September 5, 2019. Available online at: [Environmental Review Documents | SF Planning](#), accessed August 2024.

building. The existing 14,000-gross-square-foot annex building, surface parking lots, and ramp structures will be demolished. Thirteen new buildings ranging from four-story duplex townhouses to six-story apartment buildings, some as residential-only buildings (“Masonic,” “Euclid,” and “Mayfair” buildings and seven “Laurel Duplex” townhouses) and others as mixed-use buildings (“Plaza A,” “Plaza B,” and “Walnut” buildings) containing non-residential uses on the ground and second floors will also be constructed.

The final EIR described and analyzed the proposed project and a project variant. In addition, the RTC provided revisions and accompanying analysis for a revised project and a revised project variant. The revised project variant in the RTC is the approved project and will be referred to herein as the “approved project.” The approved development program includes 1,427,832 gross square feet of new and adaptively reused buildings with 744 housing units (558 market-rate and 186 affordable units⁴) within 977,437 gross square feet of residential floor area; 34,496 gross square feet of retail floor area, a 14,665-gross-square-foot childcare center, and 839 class 1 and class 2 bicycle spaces. The parking program includes 401,234 gross square feet of off-street parking with 859 parking spaces: 707 spaces for residential uses, 74 spaces for retail uses, 29 spaces for childcare use, and 10 carshare spaces. It will also provide 211,796 square feet of open areas, some of which will be public open space and some of which will be private open space exclusively for residents. The approved project will include the following streetscape improvements: a new at-grade street crossing; sidewalk expansion; enhanced paving; and installation of new street trees and street lighting on various public rights-of-way.

The EIR assumed that the 10.25-acre site would be redeveloped in four overlapping construction phases with full build-out of the approved project expected to occur approximately seven years after project entitlements.

The approved project described in this addendum includes changes at the time of EIR certification and subsequent changes.⁵ The planning department determined that subsequent project changes in April 2021 related to open space calculations; the removal of the southernmost Laurel Duplex and associated expansion of Euclid Green; modifications to the Presidio Steps (also referred to as Pine Street Steps); and a reduction in the number of new street tree plantings along Laurel Street and Euclid Avenue would not alter the final EIR conclusions and documented this determination with memorandum to the case file. Those project changes are incorporated by reference. See **Figure 1: Proposed Site Plan - Approved Project**, p. 4, **Figure 2: Proposed Site Plan - Modified Project**, p. 5, and **Table 1: Characteristics of Proposed Buildings on the Project Site – Modified Project**, pp. 6-7, and the description below for an overview of physical project modifications in comparison to the approved project.

Proposed Modifications to the Approved Project

Subsequent to the certification of the EIR and project changes made in April 2021, the approved project has been revised. This revision is referred to herein as the “modified project.” The modified project differs from the approved project analyzed in the EIR as described below.

⁴ A total of 25 percent of the approved project’s housing units will be deed-restricted, on-site affordable units designated for low-income senior households, i.e., 558 market-rate units and 186 affordable units). These affordable units will be in the proposed Walnut Building on California Street (185 studio and 1-bedroom units for seniors plus one on-site manager’s unit).

⁵ San Francisco Planning Department, *Errata to the Responses to Comments on the Draft Environmental Impact Report for the 3333 California Street Mixed-Use Project*, Planning Department Case No. 2015-014028ENV, August 29, 2019. Available online at: [Environmental Review Documents | SF Planning](#), accessed August 2024.

The modified project would include the construction of two separate buildings instead of one within the same footprint as the approved Walnut Building; minor massing modifications to the proposed Plaza B Building, Center Building A, and Center Building B; and changes to the off-street parking program, garage access, and site circulation. There would still be four construction phases, but the components constructed in each phase would be modified to deliver a greater number of residential units in Phase 1. However, there would be limited changes to the overall magnitude of demolition, soils disturbance, and excavation program analyzed in the final EIR which assumed that the depths of excavation would range from 7 to 40 feet below the existing grade. See **Table 1: Characteristics of Proposed Buildings on the Project Site - Modified Project**, pp. 6-7, and **Table 2: Parking Summary - Modified Project**, pp. 8-9 for a comparison of development program, including housing unit mix, and the parking program changes between the approved project described and analyzed in the final EIR and the modified project with changes shown in ~~striketrough~~ and double underline. **Table 3: Construction Phasing Program - Approved Project and Modified Project**, p. 9, summarizes the construction schedule and phasing changes between the approved project and the modified project.

DEVELOPMENT PROGRAM CHANGES

WALNUT BUILDING CHANGES

See **Table 1** and **Table 2**, pp. 6-7 and 8-9 for the comparison of approved project and modified project details. Under the modified project, two buildings would be constructed within the same footprint of the proposed Walnut Building with limited changes to the design, housing unit mix, and overall gross square footage. A senior affordable housing building (“Senior Housing”) with 125 affordable housing units on the north along California Street and a market rate housing building (“new Walnut Building”) with 60 housing units on the south along the proposed east-west Mayfair Walk would surround a single interior courtyard (see **Figure 1**, p. 4). The Walnut Building childcare and ground floor retail uses under the approved project would remain in the modified project but would be located within the new Walnut Building and would be slightly reduced in size (from 14,650-gross-square-feet of childcare uses to 13,933 gross square feet and from 18,800 gross square feet of ground-floor retail uses to 8,467 gross square feet retail). Under the modified project access to the California Street Garage would continue to be from Presidio Avenue and California Street/Walnut Drive and parking associated with the proposed uses in the senior affordable housing building and new Walnut Building would be reduced (from 185 spaces including 10 carshare spaces to 173 spaces including 5 carshare spaces).

(Continued below.)



Figure 1. Proposed Site Plan - Approved Project



Figure 2. Proposed Site Plan - Modified Project

Table 1. Characteristics of Proposed Buildings on the Project Site - Modified Project (changes shown in strikethrough and double underline)

Building Characteristics	Center Bldg. A	Center Bldg. B	Plaza A Building	Plaza B Building	Senior Housing Building	New Walnut Building	Masonic Building	Euclid Building	Laurel Duplexes	Mayfair Building	Totals
Location	Center of Site (Office Bldg. Renovation)		California Street (New Construction)				Presidio/Masonic/Euclid (New Construction)		Laurel Street (New Construction)		
Building Height	80 ft.	80 - 92 ft.	45 ft.	45 ft.	67 ft.	<u>67 ft.</u>	40 ft.	40 ft.	37 - 40 ft.	40 ft.	--
# of Stories	6	6 - 7	4	4	6	<u>6</u>	4 - 6	4 - 6	4	4	--
Use (gsf)	344,133 <u>359,568</u>		150,900 <u>140,192</u>	152,544 <u>133,393</u>	336,700 <u>94,674</u>	275,666	97,725 <u>102,503</u>	226,530 <u>231,997</u>	60,260 <u>48,700</u>	59,040 <u>54,607</u>	1,427,832 <u>1,440,254</u>
Residential	321,402 <u>329,001</u>		66,755 <u>77,015</u>	72,035 <u>85,382</u>	147,590 <u>94,674</u>	75,534	88,906 <u>81,703</u>	177,345 <u>188,764</u>	54,111 <u>42,200</u>	43,071 <u>46,284</u>	978,611 <u>1,025,488</u>
Retail	0		14,178 <u>13,593</u>	11,328 <u>16,034</u>	18,800	8,467	0	4,287 <u>0</u>	0	0	34,496 <u>38,094</u>
Childcare	0		0	0	14,665	13,933	0	0	0	0	14,665 <u>13,933</u>
Parking	22,731 <u>30,567</u>		69,329 <u>49,584</u>	69,329 <u>31,977</u>	165,945	170,939	14,220 <u>20,800</u>	42,360 <u>43,233</u>	4,960 <u>6,500</u>	12,360 <u>8,323</u>	401,234 <u>362,739</u>
Housing Units	190 <u>152</u>		67 <u>73</u>	61 <u>69</u>	186 <u>125</u>	60	57 <u>52</u>	139 <u>171</u>	14 <u>12</u>	30	744
Studio + 1 bedroom	75 <u>59</u>		40 <u>47</u>	30	185 <u>124</u>	28	22 <u>20</u>	55 <u>79</u>	0 <u>1</u>	12 <u>17</u>	419 <u>405</u>
2 bedrooms	60 <u>72</u>		23 <u>22</u>	25 <u>32</u>	1	32	25 <u>24</u>	54 <u>80</u>	0	7 <u>6</u>	195 <u>269</u>
3 bedrooms	40 <u>11</u>		4	6 <u>7</u>	0	0	10 <u>7</u>	31 <u>12</u>	1 <u>6</u>	10 <u>7</u>	103 <u>54</u>

Building Characteristics	Center Bldg. A	Center Bldg. B	Plaza A Building	Plaza B Building	Senior Housing Building	New Walnut Building	Masonic Building	Euclid Building	Laurel Duplexes	Mayfair Building	Totals
4 bedrooms	15 <u>10</u>		0	0	0	<u>0</u>	0 <u>1</u>	0	12 <u>5</u>	0	27 <u>16</u>
Bicycle Parking Spaces ^{Note C}	202 <u>160</u>		83	77	223 <u>140</u>	<u>67</u>	61 <u>55</u>	147 <u>178</u>	16 <u>13</u>	32	839 <u>814</u>
Residential Class 1/Class 2	190/12 <u>152/8</u>		7367 / 4	61/4 <u>69/3</u>	186/9 <u>125/6</u>	<u>60/3</u>	57/4 <u>52/3</u>	139/8 <u>171/7</u>	14/2 <u>12/1</u>	30 / 2	744 / 4534 <u>4534</u>
Retail Class 1 / Class 2 ^{Note D}	0		0/10 <u>2/4</u>	4/8 <u>1/4</u>	4/4	<u>1/3</u>	0	0 / 0	0	0	8/22 <u>4/11</u>
Childcare Class 1/Class 2	0		0	0	10/10 <u>9/9</u>		0	0	0	0	10/10 <u>9/9</u>

NOTES: Changes are shown in ~~striketrough~~ text and double underline.

^A Parking for Center Building A and Center Building B would be provided in Basement Level B1 under Center Building B and in Basement Level B1 of the proposed California Street Garage.

^B Includes the car-share spaces and Americans with Disabilities Act accessible spaces. Pursuant to San Francisco Green Building Code sections 4.106.4 and 5.106.5 up to 8 percent of parking spaces would be developed with electric vehicle charging stations and other spaces would be electric vehicle ready.

^C Residential class 1 spaces would be located within storage rooms in the proposed buildings. Class 2 spaces would be located along adjacent sidewalks near proposed retail and residential entrances.

^D Retail class 1 spaces would be located in two separate storage rooms in Basement Level B1 – one under the Plaza B Building and one under the Walnut buildings.

SOURCES: Laurel Heights Partners, LLC; BAR Architects; Solomon Cordwell Budenz; and Jensen Architects, August 2017, and April 2024

Table 2. Parking Summary- Modified Project (changes shown in strikethrough and double underline)

Garage	Primary Entrances	No. of Parking Spaces	Assigned Use
California Street Garage (Under Plaza A, Plaza B, and senior affordable housing and new Walnut buildings)	Laurel Street	128 <u>146</u>	Residential uses in Plaza A and Plaza B buildings
	Walnut Street	73 <u>56</u>	Retail uses in Plaza A; <u>and</u> Plaza B, Walnut, and Euclid buildings
		102 <u>163</u>	Residential uses in Center Building A and Center Building B
		10 <u>5</u>	Residential uses in Walnut Building <u>Car-share spaces for members</u>
	Presidio Avenue	60	<u>Residential uses in new Walnut Building</u>
		80 <u>61</u>	Office use <u>Residential uses in senior affordable housing</u>
		13 <u>18</u>	Retail use in <u>new</u> Walnut Building
		26	Renovated Basement B3 for residential uses Center Buildings A and B
		29	Childcare use in new Walnut Building
		11 <u>5</u>	<u>Car-share space for members</u>
62		Residential uses in Center Building A and Center Building B	
Masonic Garage (Under Masonic and Euclid buildings)	Masonic Avenue	57 <u>232</u>	Residential uses in <u>Euclid and</u> Masonic Buildings
		139	Residential uses in Euclid Building
		2	Residential use for one Laurel Duplex
Mayfair Garage (Under Mayfair Building)	Private drive off of Laurel Street	30	Residential uses in Mayfair Building
Laurel Garages (<u>6</u> Laurel Duplexes)	Mayfair Drive and private on-site drive	14 <u>12</u>	Residential uses in Laurel Duplexes

Garage	Primary Entrances	No. of Parking Spaces	Assigned Use
Total No. of Parking Spaces		857 <u>820</u> off-street parking spaces	<u>744707</u> for residential uses 74 for retail use 29 for childcare use <u>10</u> car-share spaces
NOTES: sf – gross square feet; changes from approved project shown in strike through text and <u>double underline</u> .			

SOURCES: LAUREL HEIGHTS PARTNERS, LLC; BAR ARCHITECTS; SOLOMON CORDWELL BUDENZ; AND JENSEN ARCHITECTS, AUGUST 2017, AND APRIL 2024, AND OCTOBER 7, 2024.

Table 3. Proposed Construction Phasing Program - Approved Project and Modified Project

Proposed Construction (Approved Project)			Proposed Construction (Modified Project)		
Phase	Building(s)	Total (gsf)	Phase	Building(s)	Total (gsf)
Phase 1 (2020–2022)	Masonic and Euclid	358,515	Phase 1 (June 2025–April 2027)	Masonic, Euclid, Mayfair, and Laurel Duplexes	443,554
Phase 2 (2021–2023)	Center Building A and Center Building B	342,146	Phase 2 (January 2026–September 2027)	Center Building A, Center Building B, new Walnut	628,441
Phase 3 (2022–2025)	Plaza A, Plaza B, Walnut	658,666	Phase 3 (January 2027–September 2028)	Senior Affordable Housing	94,674
Phase 4 (2025–2027)	Mayfair and Laurel Duplexes	117,660	Phase 4 (January 2029–September 2030)	Plaza A and Plaza B	273,585
Approved Project Total		1,476,987	Modified Project Total		1,440,254
NOTE: gsf – gross square feet					

SOURCES: Laurel Heights Partners, LLC and Webcor, September 2017, and April 2024

PLAZA B BUILDING CHANGES

See **Table 1** and **Table 2**, pp. 6-9. Under the modified project, the Plaza B Building would have a slightly different footprint and top floor massing but would be approximately the same shape and height as the approved project with a slight reduction in building square footage from 152,544 to 133,393 gsf (see **Figure 1**, p. 4). Under the modified project, the housing unit mix would be modified, the unit count would increase from 61 to 69 units, and the ground-floor retail component would increase (from 11,328 gross square feet to 16,034 gross square feet). Under the modified project access to the California Street Garage would continue to be from Laurel and California streets via Walnut Drive, and parking associated with the proposed uses in the Plaza A and Plaza B Building would change (from 184 spaces to 207 spaces including 5 carshare spaces).

CENTER BUILDING A AND CENTER BUILDING B CHANGES

Center Building A and Center Building B would have virtually the same footprints under the modified project as under the approved project (see **Figure 1**, p. 4). Under the modified project a similar program of select demolition, alteration, structural strengthening, and design interventions for adaptive reuse of the office buildings as two residential buildings would be implemented (see EIR p. 2.34). The massing changes under the modified project would maximize residential space and would include the removal of the connecting bridge at Floor 4 over the proposed north-south Walnut Walk; an inward shift of the Center Building B exterior wall along the proposed Walnut Walk; demolition of an existing stair at Floor 7; and level-by-level and floor-by-floor plan refinements for residential lobbies, common and private open space, and other amenities. Proposed building heights for Center Building A and Center Building B would be the same as for the approved project. Under the modified project access to the California Street and Masonic garages would continue to be from Presidio Avenue (two separate locations) and California Street and parking associated with the proposed uses in Center Building A and Center Building B would change (from 102 spaces to 163 spaces). Overall, there would be a decrease in the housing unit number and a change in the unit mix for Center Building A and Center Buildings B, as well as modifications to the proposed massing under the modified project but the total number of housing units in the overall project would remain unchanged from the approved project.

OTHER BUILDING PROGRAM CHANGES

Under the modified project, minor changes to the approved project shown in **Table 1** and **Table 2**, pp. 6-7 and 8-9, are a function of refined designs from the conceptual stage to 100 Percent Schematic Design. Changes to overall and building-by-building gross square footage, gross square footage by use, housing unit mix, and parking among other building and/or site characteristics since certification of the final EIR are provided. As shown, under the modified project the ground floor retail component of the Plaza A Building would be reduced from 14,816 gross square feet to 13,593 gross square feet. Overall, the building program changes (including changes to building footprints and massing) would be minor.

PARKING AND CIRCULATION CHANGES

Under the modified project, the proposed off-street parking garage layouts for the California Street, Masonic Avenue, and Laurel Street/Mayfair Drive garages would be slightly different than those assumed for the approved project. Under the modified project on-street commercial and passenger loading zone locations and widths would be essentially the same as the approved project as would the curb cuts and

driveway locations for entry and exit to the off-street garages (see **Figure 3: Proposed Site Access - Approved Project**, p. 13, **Figure 4a: Proposed Site Access - Modified Project**, p. 14, and **Figure 4b: Proposed Site Access - Modified Project**, p. 15).

Proposed changes to the housing unit mix and retail gross square footage would result in a reduced parking program---from 857 spaces under the approved project to 820 spaces under the modified project (see **Table 2**, p. 8-9). The modified project would provide 12 additional vehicle parking spaces accessible from the California Street/Walnut Street entrance (from 215 spaces to 227 spaces), 88 fewer spaces accessible from the Presidio Avenue entrance (from 261 spaces to 173 spaces), 14 fewer spaces accessible from Masonic Avenue, 2 fewer spaces accessible via Laurel Street/Mayfair Drive, and 14 additional vehicle parking spaces accessible from Laurel Street (from 128 spaces to 142 spaces).

CONSTRUCTION SCHEDULE AND PHASING CHANGES

Full-build out under the modified project would be expected in five years, rather than in seven years as described and analyzed in the EIR for the most conservative CEQA analysis. As shown in **Table 3**, p. 9, the preliminary construction schedule under the modified project assumes spring 2025 as the start of construction and spring 2030 as the end of construction. As shown in **Figure 5: Preliminary Construction Phasing Diagram - Approved Project** and **Figure 6: Preliminary Construction Phasing Diagram - Modified Project**, pp. 16 and 17, construction activities for the four development phases would be modified to develop a larger proportion of the residential component of the overall development program more expeditiously (i.e., more housing units earlier). Like the approved project the proposed development program would also be constructed over four overlapping construction phases but with minor modifications. Site redevelopment under the modified project is listed below Mayfair Building and Laurel Duplexes with Phase 1, as modified, rather than Phase 4, as approved; and Walnut Building (the market rate component) with Phase 2, as modified, rather than Phase 3, as approved.

- Phase 1 (Masonic, Euclid, and Mayfair buildings and Laurel Duplexes)
- Phase 2 (Center Building A, Center Building B, and new Walnut Building)
- Phase 3 (Senior Affordable Housing)
- Phase 4 (Plaza A and Plaza B Buildings)

In addition, construction activities within each development phase and among the overlapping development phases would continue to be sequenced, i.e., the Phase 2 demolition stage for the adaptive reuse of the existing office building (Center Building A and Center Building B) would commence during the exterior work for the proposed Masonic, Euclid, and Mayfair buildings and Laurel Duplexes in Phase 1.

Under the modified project there would be no change to the mat foundation types assumed under the approved project. Construction staging, including concrete truck staging, would remain unchanged from what is described in the FEIR. Even though construction would be expedited under the modified project all construction activities would occur as described in the final EIR and continue to comply with the San Francisco Noise Ordinance. Similar to the approved project, nighttime construction work is not anticipated, nor is construction anticipated to occur on Sundays or major legal holidays.

Construction changes associated with the development of two separate buildings within the footprint of the Walnut Building and minor massing changes to the Plaza B Building and Center Building A and Center

Building B as well as overall building design refinements to the Plaza A Building, the Masonic Building, the Euclid Building, the Mayfair Building, and the Laurel Duplexes would not require any changes in construction processes, additional construction equipment, or a change in the excavation, shoring and foundation program(s). Furthermore, as a “Type 3” priority project, the project sponsor has committed to the use of low-emission off-road diesel construction equipment that meets the City’s Priority Application Processing requirements for clean construction as described in Director Bulletin No. 2 Type 3 project require submittal of Clean Construction Plan prior to commencement of any construction activities. The Clean Construction Plan equipment and site requirements include the following:

1. All off-road equipment greater than 25 horsepower and operating for more than 20 total hours over the entire duration of construction activities shall have engines that meet or exceed either U.S. Environmental Protection Agency (USEPA) or California Air Resources Board (CARB) Tier 4 Interim or Tier 4 Final off-road emission standards.
2. Where grid power is available, portable diesel engines shall be prohibited.
3. All diesel engines, whether for off-road or on-road equipment or vehicles, shall not be left idling for more than two minutes, at any location, except as provided in exceptions to the applicable state regulations regarding idling for off-road and on-road equipment (e.g., traffic conditions, safe operating conditions). The project sponsor shall post legible and visible signs in English, Spanish, and Chinese, in designated queuing areas and at the construction site to remind operators of the two-minute idling limit.
4. The project sponsor shall cause for construction workers and equipment operators to be instructed on the maintenance and tuning of the construction equipment onsite and require that such workers and operators properly maintain and tune that equipment in accordance with manufacturer specifications.

(Continued below.)

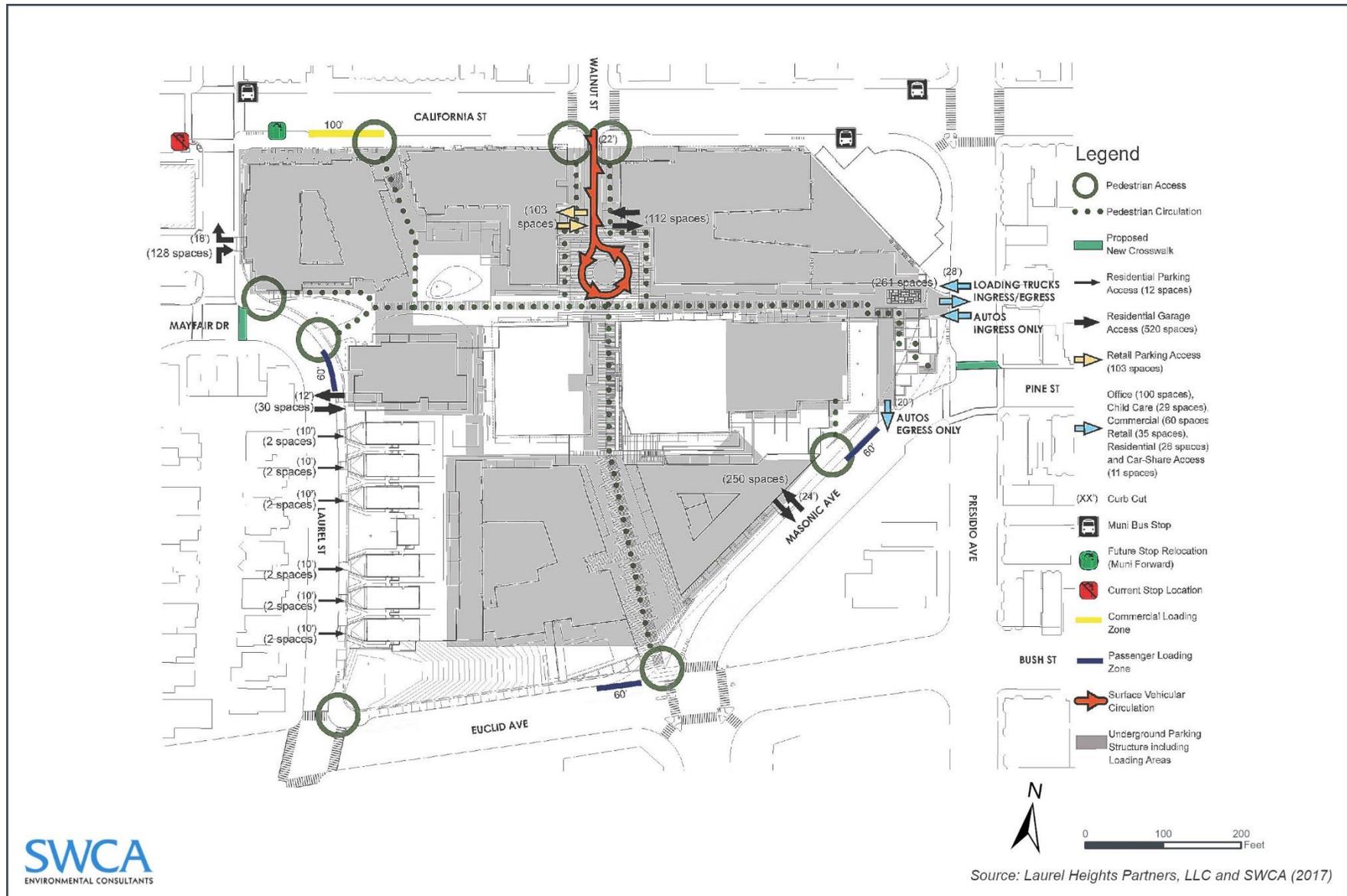


Figure 3. Proposed Site Access - Approved Project

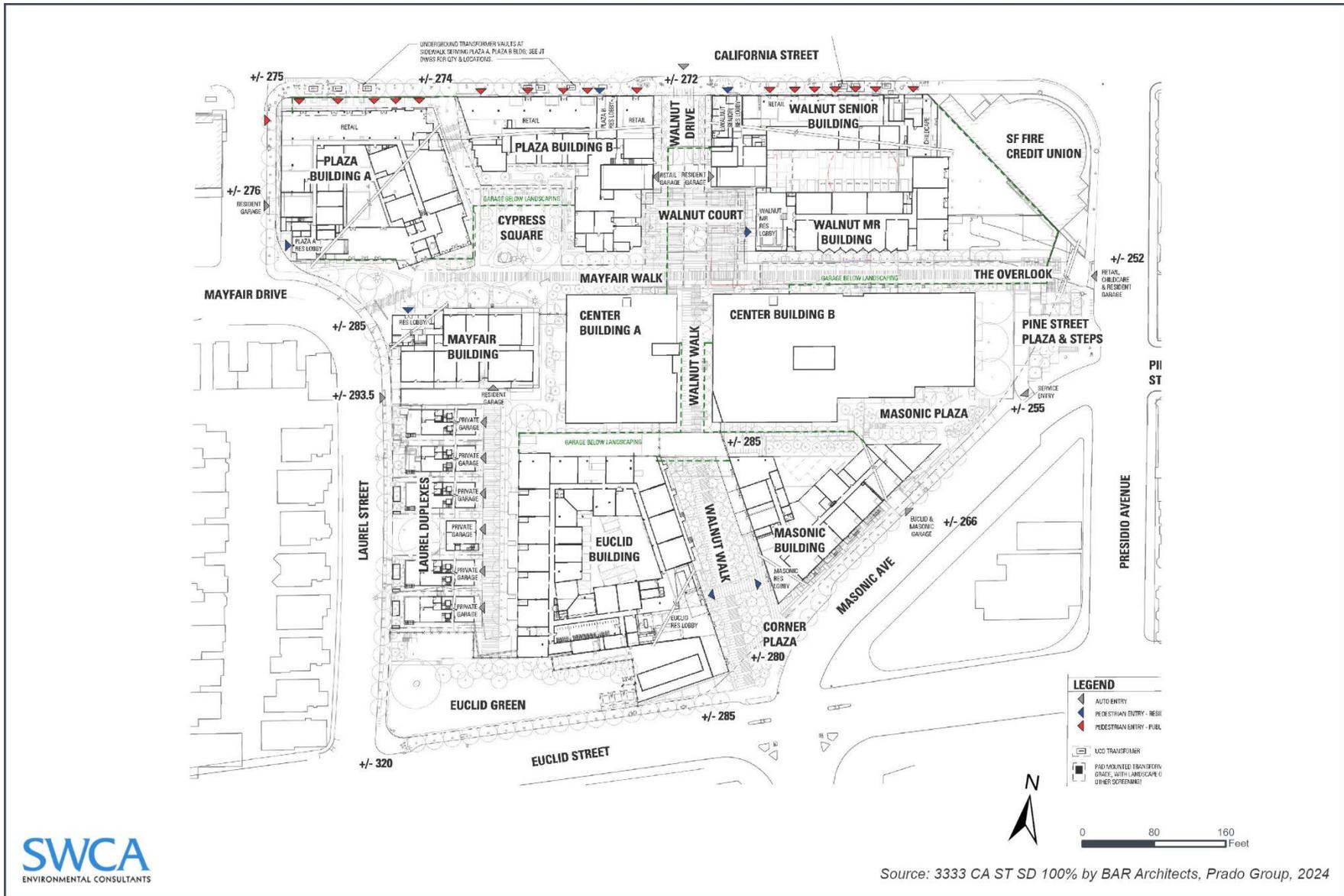


Figure 4a. Proposed Site Access – Modified Project



Figure 4b. Proposed Site Access - Modified Project

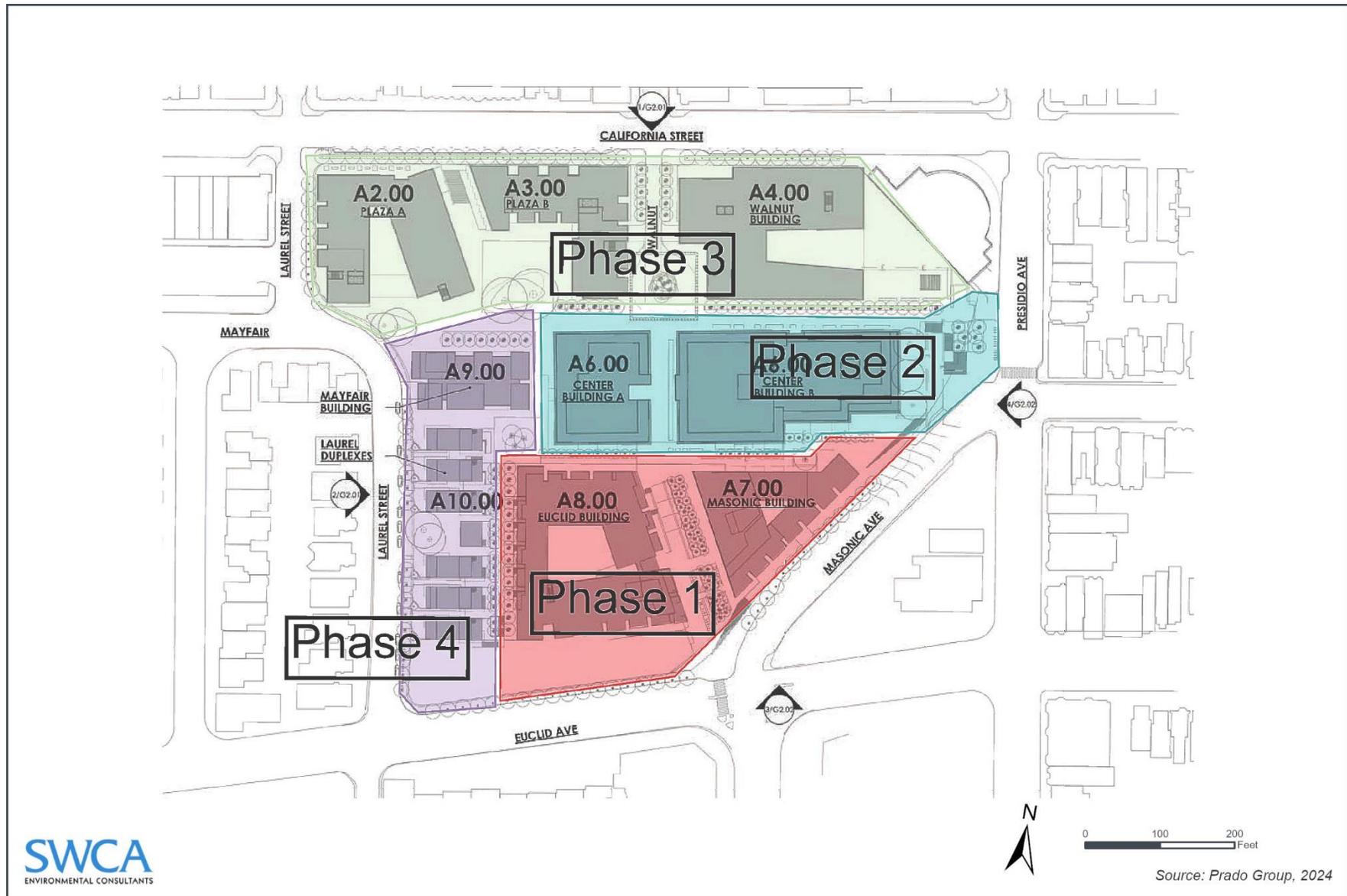


Figure 5. Preliminary Construction Phasing Diagram - Approved Project

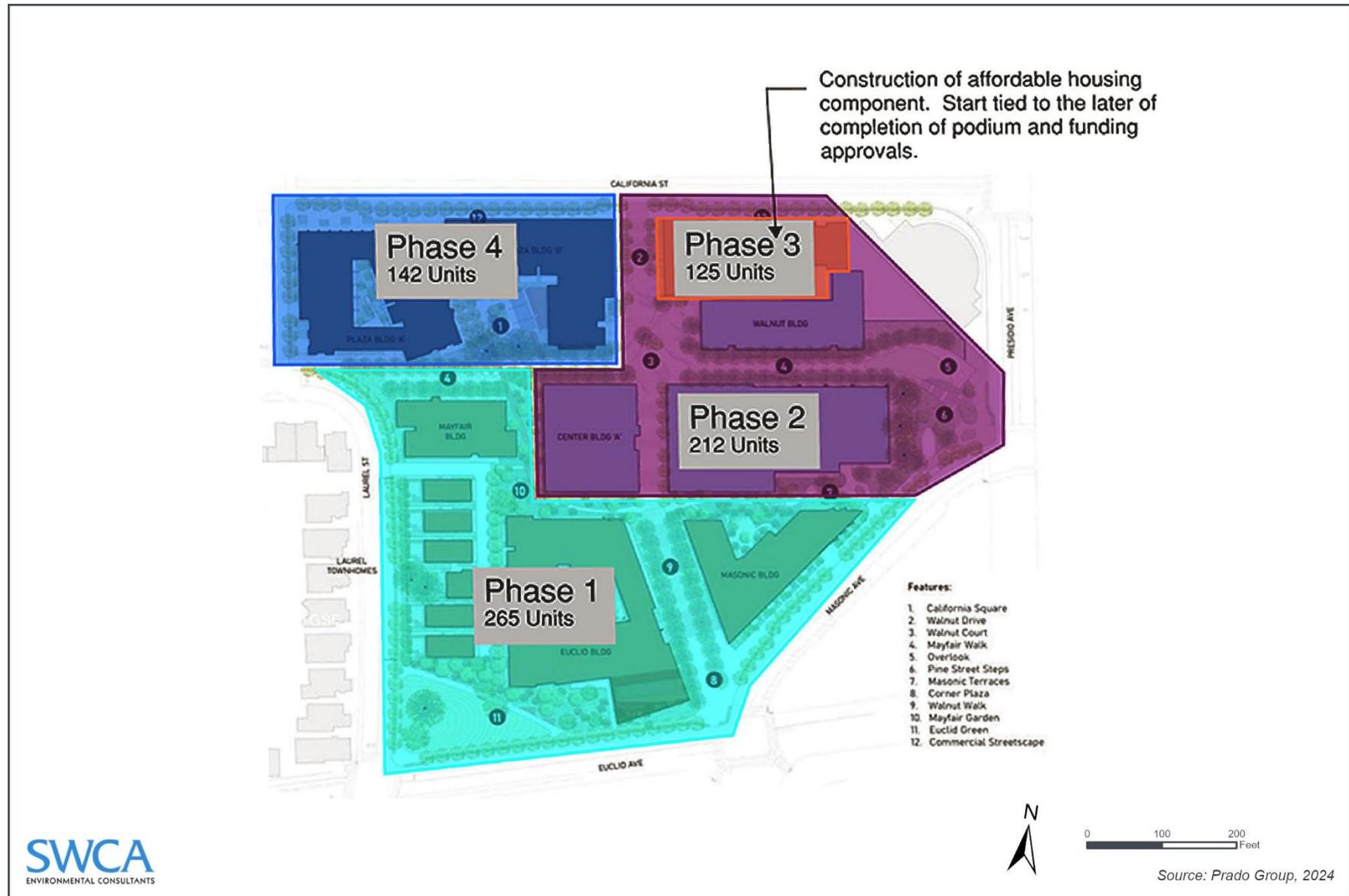


Figure 6. Preliminary Construction Phasing Diagram - Modified Project

SUMMARY

Changes to the proposed development program and the construction schedule and development phasing under the modified project, including level-by-level and floor-by-floor building design refinements since the conceptual design analyzed in the final EIR, would alter the housing unit mix (primarily through the change in the Walnut Building and refined building designs) and cadence of construction (through increased residential development during the initial development phases) (see **Table 1** and **Table 3**, pp. 6-7 and 9, respectively; and **Figure 5** and **Figure 6**, pp. 16 and 17, respectively). Overall, the proposed modifications would not increase the total number of housing units or the overall building program including the retail and childcare uses analyzed in the EIR. Furthermore, changes to the parking program and site circulation patterns to access the off-street parking garages as well as commercial and passenger loading spaces would be limited (see **Table 2**, p. 8-9, and **Figure 3** and **Figure 4a** and **Figure 4b**, pp. 13, 14 and 15, respectively). The development program and parking program changes with an expedited construction schedule combined with the project sponsor's enrollment in the City's Priority Applications Processing program for clean construction projects (Type 3) are among the changes that will be analyzed below for this addendum.

Development Agreement Amendments

As part of the modified project, the City and County of San Francisco and the project sponsor for the 3333 California Mixed Use project seek to amend the Development Agreement (DA). The Planning Commission will consider and make a recommendation to the Board of Supervisors regarding the amendments to the DA to: (1) extend the term of the DA, (2) modify the affordable housing requirements, (3) allow the project to qualify for the Temporary Fee Reduction Program under Planning Code Section 403, and (4) include a finance plan with a framework to use incremental property tax revenue to fund the modified project's public capital facilities and affordable housing. These amendments to the DA would not result in physical environmental impacts other than those in the final EIR.

The project sponsor also intends to submit refined plans reflecting the physical changes to the approved project plans (modified Walnut Building, unit mix, parking, circulation, and construction phasing) as described above. The anticipated changes to the approved project are incorporated into the modified project description, and environmental impacts of these changes are analyzed in this EIR Addendum 1.

Remarks (Continued)

Approach to and Analysis of Potential Environmental Effects

APPROACH

The proposed modifications to the approved project are reevaluated in accordance with California Environmental Quality Act (CEQA) Guidelines Section 21166 and CEQA Guidelines Sections 15162–15163 which provide that when an EIR has been certified for a project, no new, subsequent, or supplemental EIR shall be required unless one or more of the following events occurs: (1) substantial changes are proposed in the project, which will require major revisions of the EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; (2) substantial changes occur with respect to the circumstances under which the project is being undertaken, which will require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or (3) new information of substantial importance, which was not known and could not have been known at the time the EIR was certified, becomes available.

Additionally, Section 31.19(c)(1) of the San Francisco Administrative Code states that a modified project must be reevaluated and that, “If, on the basis of such reevaluation, the Environmental Review Officer determines, based on the requirements of CEQA, that no additional environmental review is necessary, this determination and the reasons therefor shall be noted in writing in the case record, and no further evaluation shall be required by this Chapter.”

CEQA Guidelines section 15164 provides for the use of an addendum to document the basis for a lead agency's decision not to require a subsequent FEIR for a project that is already adequately covered in a previously certified FEIR. An addendum to a certified final EIR may be prepared if some changes or additions are necessary, but none of the conditions described in section 15162 calling for the preparation of a supplemental or subsequent final EIR have occurred. This addendum evaluates whether the environmental impacts of the modified project are addressed in the final EIR that was certified on September 5, 2019. As shown in the analysis below, the modified project, which is the subject of this addendum, would not result in new environmental impacts, substantially increase the severity of the previously identified environmental impacts, nor require new mitigation measures. Additionally, no new information has emerged that would materially change the analyses or conclusions set forth in the final EIR. Therefore, as discussed in more detail below, the modified project would not change the analysis or conclusions reached in the final EIR.

UPDATES TO CEQA GUIDELINES

Since EIR certification, the CEQA Guidelines Appendix G Environmental Checklist Form has been updated to add the topics Tribal Cultural Resources and Wildfire. Accordingly, these topics are discussed in the analysis of potential environmental effects below, as applicable.

ANALYSIS

The final EIR and subsequent project modifications evaluated potential physical environmental impacts of the approved project and found that implementation would result in project-specific significant

environmental effects that could be mitigated to a less-than-significant level with implementation of mitigation measures, except for historic architectural resources, transit capacity utilization, and construction noise.

The project sponsor committed to a Mitigation Monitoring and Reporting Program, which was adopted as part of the conditions of approval for the approved project. All applicable mitigation measures from the approved project would be required for the modified project.

This addendum evaluates the modified project with respect to the resource topics discussed in the final EIR. Because the modified project remains within the boundaries of the project site analyzed and would be similar to the approved project evaluated in the final EIR, only those environmental topics with significant impacts or otherwise requiring additional analysis or new analysis are discussed in detail below.

Topics Addressed in the EIR

CULTURAL RESOURCES

HISTORIC ARCHITECTURAL RESOURCES

The EIR (pp. 4.B.36 – 4.B.50) and the initial study [Appendix B] determined that implementation of the Project Variant could cause a substantial adverse change in the significance of a historic resource as defined in CEQA Guidelines Section 15064.5. Under the modified project a similar program of select demolition, alteration, structural strengthening, and design interventions for adaptive reuse of the office building as two residential buildings would be implemented (see EIR p. 2.34). The limited massing changes under the modified project would include the removal of the proposed connecting bridge at Floor 4 over the proposed north-south Walnut Walk included in the approved project and level-by-level and floor-by-floor plan refinements. Similar to the approved project the remainder of the site would be redeveloped with a mix of new buildings and townhomes at similar scale and locations on the site. Therefore, the modified project would not result in any changes to the EIR findings and **Mitigation Measure M-CR-1a: Documentation of Historical Resource** and **Mitigation Measure M-CR-1b: Interpretation of the Historical Resource** applicable to the approved project would also apply to the modified project.

TRANSPORTATION AND CIRCULATION

The Transportation and Circulation Sections of the EIR (Vol. 1, pp. 4.C.68 – 4.C.101 and Vol. 2, RTC pp. 2.31 - 2.37) determined that implementation of the revised project variant or the approved project would result in an adverse transit capacity utilization impact for Muni route 43 Masonic during the weekday a.m. peak hour under baseline conditions. Page 2.31 of the final EIR (RTC) indicates that travel demand for the approved project would not have a demonstrable effect on trip generation for the project variant in the EIR. The modified project would provide the same number of residential units with fewer bedrooms and less childcare square footage. In addition, there would be a slight increase in retail square footage. Therefore, the modified project would have a similar number of vehicle trips and freight and passenger loading trips as compared to the approved project. These trips would follow the same general trip distribution pattern as the approved project with minor adjustments to the travel paths to account for redistribution of the

vehicle parking spaces provided onsite.⁶ The modified project would not result in any changes to the EIR findings and **Mitigation Measure M-TR-4: Monitor and Provide Fair-Share Contribution to Improve 43 Masonic Capacity** applicable to the approved project would also apply to the modified project.

The average daily vehicle miles traveled (VMT) per capita and per employee in the transportation analysis zone in which the project site is located are more than 15 percent below the existing regional average for each use in the project. Given the influence of parking supply on VMT, additional analysis was conducted to determine if there would be a significant VMT impact.

The analysis prepared for the modified project addressed the potential for substantial VMT related to parking supply for residential, retail and other uses (childcare). The analysis found that for residential uses, the modified project would have a parking rate of 0.95 spaces per unit compared with the neighborhood parking rate of 0.90 spaces per unit, a 5 percent increase. However, the VMT for the transportation analysis zone in which the project site is located is 62 percent below the existing regional average for residential use. Therefore, the additional residential parking supply would not increase VMT per capita to exceed the threshold of 15 percent below the regional average for residential use. The parking rate for retail uses in the project neighborhood is 1.55 spaces for every 1,000 square feet (sf) of retail use. The modified project would provide 74 vehicle parking spaces for retail which results in a parking rate of 1.94 vehicle parking spaces per 1,000 sf of retail use. This rate is 25 percent higher than the neighborhood retail parking rate of 1.55 parking spaces per 1,000 sf. However, the modified project would comply with **Mitigation Measure M-TR-2, Reduce Retail Parking Supply**, which would reduce the VMT impact related to retail parking supply to less than significant, as the retail parking rate would be below 2.14. The existing neighborhood parking rate for other non-residential (e.g., daycare) uses is approximately 1.44 spaces per 1,000 square feet. With 29 vehicle parking spaces dedicated to childcare use, the modified project would provide 2.08 vehicle parking spaces per 1,000 square feet of other non-residential use. This is about 45 percent higher than the existing neighborhood parking rate for this use. However, given the average daily VMT per other use employee for the TAZ is 40 percent below the existing regional average daily VMT, the likely increase in VMT per employee associated with provision of other non-residential (daycare) parking spaces would not increase VMT per employee enough to exceed the threshold of 15 percent below the regional average for these uses; moreover, the VMT estimates do not account for the TDM measures that may offset some of the VMT increases from the proposed project and project variant's parking rate. Accordingly, the VMT impacts of the modified project's other non-residential (office and daycare) uses would be less than significant.

Changes to the transportation circulation network in the project area related to construction activities would be conducted in compliance with City codes and regulations. Adherence to the established guidance in the blue book would ensure that construction work can be done both safely and with the least possible interference with pedestrians, bicycle, transit and vehicular traffic. Effects of construction resulting from the modified project would be expected to be similar or the same as those identified in the EIR.

Overall, the modified project with minor changes to the development program and changes to construction phasing would not result in new or more severe transportation and circulation impacts above those disclosed and discussed in the EIR for the approved project.

⁶ Kittelson and Associates, Inc. October 2024. 3333 California Street – Revised Project Transportation Assessment. Available in project record 2015-014028ENV-02 under Related Records through the San Francisco Property Information Map. Online at [Property Information Map](#). Accessed October 1, 2024.

NOISE AND VIBRATION

For the modified project, construction would continue to be sequenced over four development phases but would be developed over five years rather than seven years for the approved project (see **Table 3**, **Figure 5**, and **Figure 6**, pp. 9, 16 and 17, respectively). Further changes would include a slight re-ordering of the components of each of the four development phases, i.e. the Laurel Duplexes and Mayfair Building would shift from Phase 4 under approved project to Phase 1 under modified project. There would be limited changes to the site preparation, demolition, and excavation program. Most other important project features such as number and location of emergency diesel generators and equipment associated with heating ventilation air conditioning (HVAC) systems would also be essentially the same although in slightly different locations due to level-by-level and floor-by-floor refinements to the residential, retail, and childcare uses and to off-street parking layouts. The *2024 Updated Phasing Project Air Quality and Noise Analysis Results* are available for review.⁷

OPERATIONAL

Buildout operational noise emissions from the approved project are assumed to be the same as what was presented and analyzed for the approved project. **Mitigation Measure M-NO-3, Stationary Equipment Noise Controls**, for operational stationary noise sources would still apply to the modified project.

CONSTRUCTION

As described in the Updated Phasing Project Air Quality and Noise Analysis Results, the construction equipment horsepower rating, utilization rate, hours of operation, and construction trips remain the same for each specific subphase as what was analyzed for the approved project. In addition, reference noise and vibration levels for construction equipment from the Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA) have not changed since approval of the project. Because the equipment used for construction has not changed and the reference sound levels from the FHWA have not changed, the sound levels of construction equipment under the modified project remain unchanged from the approved project.

Regarding construction noise impacts, as outlined in the Updated Phasing Project Air Quality and Noise Analysis Results, pp. 3-4 and Tables 6-7⁸, while some of the changes in phasing result in new construction noise exposures for on-site and off-site receptors, none of the noise levels exceed the FTA general assessment threshold of 90 dBA, resulting in a less than significant impact, similar to the approved project.

Regarding increases in the existing daytime ambient due to construction activities, changes to the construction phasing and schedule under the modified project would change the dates over which significant impacts would occur but would not change the severity of the impacts. As noted in the Updated Phasing Project Air Quality and Noise Analysis Results, Table 8,⁹, the maximum increases in the existing

⁷ Ramboll, September 16, 2024. 2024 Updated Phasing Project Air Quality and Noise Analysis Results, 3333 California Street Project, San Francisco, CA. Available in project record 2015-014028ENV-02 under Related Records through the San Francisco Property Information Map. Online at [Property Information Map](#). Accessed October 1, 2024.

⁸ Ramboll, September 16, 2024. 2024 Updated Phasing Project Air Quality and Noise Analysis Results, 3333 California Street Project, San Francisco, CA. Available in project record 2015-014028ENV-02 under Related Records through the San Francisco Property Information Map. Online at [Property Information Map](#). Accessed October 1, 2024.

⁹ Ramboll, September 16, 2024. 2024 Updated Phasing Project Air Quality and Noise Analysis Results, 3333 California Street Project, San Francisco, CA. Available in project record 2015-014028ENV-02 under Related Records through the San Francisco Property Information Map. Online at [Property Information Map](#). Accessed October 1, 2024.

ambient noise levels due to construction activities would be no greater than those for the approved project. Implementation of the **Mitigation Measure M-NO-1, Construction Noise Control Measures**, as described in the EIR, would reduce construction noise levels and still be applicable; however, similar to EIR conclusions, resulting construction noise impacts would remain significant and unavoidable.

VIBRATION

The modified project's construction phasing would change the nearest phase of construction for some receptors, but it would not change the maximum anticipated construction vibration levels at offsite receptors and structures from the EIR, resulting in a less than significant impact like with the approved project.

As was the case for the approved project, construction vibration during Phase 3 construction at the SF Fire Credit Union could exceed the 0.5 in/sec PPV threshold for structural damage if construction equipment comes within 5 feet of the building. Implementation of the **Mitigation Measure M-NO-2, Vibration Monitoring Program for SF Fire Credit Union Building** as described in the EIR for the approved project, would reduce the modified project's off-site construction vibration to a less-than-significant impact.

For on-site receptors, construction vibration levels with the modified project could exceed the "strongly" perceptible standard level of 0.1 in/sec PPV at on-site receptors when using a vibratory roller within 20 feet of any newly occupied buildings, similar to the approved project. As with the approved project, use of vibratory rollers, which would result in the highest levels of potential vibration, would only be used for periods of several days at any one time in advance of paving activities, resulting in a less-than-significant on-site construction vibration impact for the modified project.

Overall, the modified project with minor changes to the development program and changes to construction phasing would not result in new or more severe noise or vibration impacts above those disclosed and discussed in the EIR for the approved project.

AIR QUALITY

For the modified project, construction would continue to be sequenced over four development phases but would be developed over five years rather than seven years for the approved project. The *2024 Updated Phasing Project Air Quality and Noise Analysis Results* are available for review.¹⁰ The analysis assumes that the generator parameters used in the EIR for the approved project would remain unchanged for the modified project. Previously, an 800kW tier 2 engine was assumed and if the modified project were to utilize a smaller engine size or a cleaner engine tier, then the health impacts from project operations would decrease.

CRITERIA AIR POLLUTANT EMISSIONS

Buildout operational emissions from the modified project are assumed to be the same as what was presented for the approved project in the EIR as the proposed revisions to the construction phasing program would does not affect buildout operation emissions. The CAP emissions from the modified

¹⁰ Ramboll, September 16, 2024. 2024 Updated Phasing Project Air Quality and Noise Analysis Results, 3333 California Street Project, San Francisco, CA. Available in project record 2015-014028ENV-02 under Related Records through the San Francisco Property Information Map. Online at [Property Information Map](#). Accessed October 1, 2024.

project's construction and interim operations are using the same conservative methods used in the EIR. Similar to the conclusions determined in the EIR for the approved project, the modified project's total estimated CAP emissions from project construction and operations were below the significance threshold for all pollutants.

HEALTH RISK ASSESSMENT

The Updated Phasing Project Air Quality and Noise Analysis Results , pp. 2-3 summarizes results of the revised health risk analysis for off-site receptors under the modified project. Compared to the approved project, the background risk values increased as a result of the Citywide Health Risk Assessment and Public Health's Air Pollutant Exposure Zone (APEZ) modeling performed by SF Planning in 2020. The operational values for cancer risk and PM_{2.5} concentration impacts for the modified project are unchanged from the approved project's EIR analysis since the updated phasing does not impact project operations. The cumulative lifetime excess cancer risk and PM_{2.5} concentration impacts remains below the APEZ criteria thresholds for the modified project; these results differ from those reported for the approved project's EIR analysis in that the cumulative results are greater due to higher background levels. The modified project's construction impacts are lower due to the revised schedule and commitment to comply with Section A of the San Francisco Planning Department's Priority Application Process for use of clean construction equipment (Type 3). Overall, similar to the approved project, the modified project would not result in any significant air quality impacts related to exposure of off-site receptors to excess cancer risk and PM_{2.5} concentrations.

The cumulative lifetime excess cancer risk and PM_{2.5} concentration impacts under the modified project at the on-site receptor are expected to decrease when compared to the approved project with the updated phasing schedule. In the EIR for the approved project, the cancer risk for the maximally exposed receptor was located at a Phase 1 resident and the risks were driven by project generator operations (22 out of 45 in a million); whereas construction emissions only accounted for 3.5 out of 45 in a million. While the generator exposure would be the same for the on-site receptors with the modified project¹¹, the onsite receptors exposure to risks from construction will decrease because the Phase 1 resident will no longer be exposed to the emissions from the construction of the townhomes along Laurel Street, which were previously planned to be constructed during Phase 4 but are now incorporated into Phase 1. The previous maximum PM_{2.5} concentration occurred at a Phase 2 resident and risks were driven by previous Phase 3 and previous Phase 4 construction overlap. The new phasing schedule would result in a smaller PM_{2.5} impact because the emissions from the construction of the townhomes along Laurel Street, previously included in phase 4, are now occurring during Phase 1.

Overall, the modified project does not result in increased air quality and health risk assessment impacts above thresholds, which is consistent with air quality findings discussed in the EIR for the approved project.

¹¹ Conservatively, the analysis assumes that the generator parameters used to analyze the approved project in the EIR would remain unchanged for the modified project. Previously, an 800kW tier 2 engine was assumed and if the modified project were to utilize a smaller engine size or a cleaner engine tier, then the health impacts would decrease compared to what was reported for the approved project.

Topics Addressed in the Initial Study (EIR Appendix B) and Initial Study Supplement (EIR Section 4.F)

The initial study found that the implementation of the approved project would have less-than-significant impacts for the following topics: land use and planning, population and housing, greenhouse gas emissions, wind and shadow, recreation, utilities and service systems, public services, hazards and hazardous materials, mineral and energy resources, and agriculture and forestry resources; and less-than-significant impacts with mitigation for the following topics: cultural resources (archeological resources, human remains, and tribal cultural resources), biological resources, and geology and soils.

As with the approved project, the following topics were analyzed for modified project build out not at the individual development phase thus the changes to expedite the construction schedule and alter the four development phases would have no impact and would not change determinations made in the initial study. Further with limited changes to the development and parking programs and the demolition, soils disturbance, and excavation program analyzed in the initial study construction and operations of the modified project with a slightly reduced and rebalanced development and parking programs would not require new mitigation measures and all mitigation measures applicable to the approved project would also be required for the modified project. Thus, the modified project would have similar or reduced impacts as the approved project and would not result in changes to the conclusions of impacts found to have no impact, less-than-significant impacts, or less-than-significant impacts with mitigation as follows:

- **Land Use and Land Use Planning:** The modified project would not physically divide the surrounding community or conflict with policies or regulations adopted for the purpose of avoiding or mitigating an environmental effect such that a substantial adverse physical change in the environment related would result. The modified project would include the same set of project approvals as the approved project. Thus, project and cumulative impacts would continue to be less-than-significant with regard to land use and planning.
- **Population and Housing:** The proposed modifications to the development program (a minor reduction) would not induce population growth or displace any existing housing, and therefore the modified project would continue to result in less-than-significant impacts with regard to population and housing and a less-than-significant cumulative impact.
- **Archaeological Resources:** Although the order in which the site preparation, demolition, grading, and the location or depth of excavation would occur under the modified project would change, it would not result in any changes to the cultural resources (archeological resources, human remains, and tribal cultural resources) findings. The initial study determined that the approved project could cause a substantial adverse change in the significance of an archeological resource, including human remains associated with the Laurel Hill Cemetery and tribal cultural resources. **Mitigation Measure M-CR-2a: Archaeological Testing, Monitoring, Data Recovery and Reporting, Mitigation Measure M-CR-2b: Interpretation** and **Mitigation Measure M-CR-4: Tribal Cultural Resources Interpretive Program** applicable to the approved project would also apply to the modified project, and therefore the modified project would continue to result in less-than-significant impacts with regard to cultural resources and a less-than-significant cumulative impact.
- **Greenhouse Gas Emissions:** As for the approved project, the modified project is subject to the regulations and requirements of the City's Greenhouse gas (GHG) Reduction Strategy. Compliance with the strategy by the modified project would result in less-than-significant impacts with regard to cumulative global climate change and GHG emissions.

- **Wind and Shadow:** The building and townhouse layout across the 10.25-acre project site as well as building heights under the modified project would be similar to that under the approved project (see **Figure 1**, p. 4). The proposed modifications are minor, and therefore would alter the analysis or conclusions regarding wind and shadow and a less-than-significant cumulative impact.
- **Utilities and Services Systems:** The proposed modifications to the construction program and development program (a minor reduction) would not result in increased water, wastewater, stormwater, or solid waste use, and therefore the modified project would continue to result in less-than-significant impacts with regard to utilities and service systems and a less-than-significant cumulative impact.
- **Recreation:** The minor reduction to the development program would not increase the use of or change the demand on recreation facilities, and therefore the modified project would continue to result in less-than-significant impacts with regard to recreation and a less-than-significant cumulative impact.
- **Public Services:** The minor reduction to the development program would not alter demand for fire, police, schools, parks, or library services, and therefore the modified project would continue to result in less-than-significant impacts with regard to public services and a less-than-significant cumulative impact.
- **Biological Resources:** Changes to the order of site preparation, demolition, grading, and the location or depth of excavation would not result in any changes to the biological resources findings. The initial study determined that the approved project could cause a substantial adverse change due to removal of trees and landscaped open areas on the 10.25-acre site as well as street trees on adjacent public rights-of way, i.e., habitat modification. **Mitigation Measure M-BI-1: Preconstruction Nesting Bird Surveys and Buffer Areas** applicable to the approved project would also apply to the modified project, and therefore the modified project would also continue to result in less-than-significant impacts with regard to biological resources and a less-than-significant cumulative impact.
- **Geology and Soils:** Changes to the order of site preparation, demolition, grading, and the location or depth of excavation would be limited, therefore the modified project would not result in any changes to the geology and soils findings. The initial study determined that the proposed earthwork for the approved project would result in less-than-significant impacts; however, the potential for inadvertent discovery of paleontological resources required standard mitigation to reduce to a less-than-significant level. **Mitigation Measure M-GE-5: Inadvertent Discovery of Paleontological Resources** applicable to the approved project would also apply to the modified project.
- **Hydrology and Water Quality:** Changes to site preparation, demolition, grading, and the location or depth of excavation would be limited therefore the modified project would not result in any changes to the hydrology and water quality findings. The initial study determined that the proposed earthwork for the approved project would result in less-than-significant impacts, and therefore the modified project would continue to result in less-than-significant impacts with regard to hydrology and water quality and a less-than-significant cumulative impact.
- **Hazards and Hazardous Materials:** The proposed modifications would not result in transport, use, handle, or distribute hazardous materials or be located on any open hazardous materials sites, within a wildfire hazards zone, within the proximity of any schools, or near any adjacent airport or airstrips, and therefore the modified project would continue to result in less-than-significant impacts with regard to hazards and hazardous materials and a less-than-significant cumulative impact.
- **Mineral Resources, Agriculture and Forestry Resources, and Wildfire:** There are no mineral resource recovery sites in the City and County of San Francisco, nor protected or designed agricultural lands, forest or timber lands, or wildfire hazard areas that could be exacerbated due to the modified project. These topics are not applicable to the modified project.

- **Energy:** The proposed modifications would not result in wasteful or inefficient energy use nor conflict with state or local renewable energy plans, and therefore the modified project would continue to result in less-than-significant impacts with regard to energy use and a less-than-significant cumulative impact.

The modified project would not change the analysis or conclusions reached in the final EIR and initial study on the environmental topics which would remain less than significant with mitigation or less than significant with mitigation agreed to by the project sponsor.

Conclusion

Based on the foregoing, the analyses conducted and the conclusions reached in the final environmental impact report certified on September 5, 2019, remain valid. No supplemental environmental review is required beyond that attached to this addendum. The proposed modifications to the project would not cause new significant impacts not identified in the final EIR, would not increase the severity of significant impacts, and no new mitigation measures would be necessary to reduce significant impacts. No changes have occurred with respect to circumstances surrounding the modified project that would cause significant environmental impacts to which the project would contribute considerably, and no new information has become available that shows that the project would cause significant environmental impacts. Therefore, no supplemental environmental review is required beyond this addendum.

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



Lisa Gibson
Environmental Review Officer

October 10, 2024

Date of Determination: October 10, 2024

cc: Don Bragg, Prado Group
Allie Stein, Prado Group
Jeff Horn, Current Planning
City Planning Commission
San Francisco Board of Supervisors
Distribution List