DRAFT ENVIRONMENTAL IMPACT REPORT

San Francisco 2004 and 2009 Housing Element

Revised Alternatives Analysis

PLANNING DEPARTMENT
CASE NO. **2007.1275E**

STATE CLEARINGHOUSE NO. 2008102033

	Draft EIR Publication Date:	**June 30, 2010**
	Draft EIR Public Hearing Date:	**August 5, 2010**
	Draft EIR Public Comment Period:	**June 30, 2010 – August 16, 2010**
	Revised Draft EIR Publication Date	**December 18, 2013**
	Revised Draft EIR Public Hearing Date	**January 23, 2014**
	Revised Draft EIR Public Comment Period	**December 18, 2013 – February 3, 2014**

SAN FRANCISCO
PLANNING
DEPARTMENT

Written comments should be sent to:
Environmental Review Officer | 1650 Mission Street, Suite 400 | San Francisco, CA 94103

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PLANNING DEPARTMENT

MEMO

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 18, 2013

TO: Distribution List for the Recirculated Housing Element EIR

FROM: Sarah Jones, Environmental Review Officer

RE: Recirculation of Portions of the 2004 and 2008 Housing Element Draft EIR (Chapter VII Alternatives)

On March 24th 2011, the San Francisco Planning Commission certified the Final Environmental Impact Report (FEIR) for the 2004 and 2009 Housing Element. On June 21, 2011 the San Francisco Board of Supervisors adopted the 2009 Housing Element as the Housing Element of the San Francisco General Plan. However, pursuant to a court order concerning Chapter VII Alternatives of the FEIR, the Planning Department has revised Chapter VII Alternatives and is recirculating it for public review. The revisions are limited to the EIR Chapter VII Alternatives, and conforming changes to a sub-section from Chapter II Executive Summary. Copies of the revised Chapter VII Alternatives along with the full text of the EIR are available on the Planning Department website (http://tinyurl.com/sfceqadocs), and CDs and paper copies are available at the Planning Information Center (PIC) counter on the first floor of 1660 Mission Street, San Francisco.

The following summarizes the changes made to the revised Chapter VII Alternatives:

- A new subsection in Chapter VII Alternatives titled "Development Assumptions by Alternative" under the Analysis of Project Alternatives section. This discussion provides generalized assumptions regarding the location, density, and types of new housing anticipated under each alternative, based on the policies associated with each alternative.
- The environmental analysis of each alternative has been revised to provide additional clarification and substantiation of the impact conclusions. The impact conclusions provided within the previously circulated EIR have not been changed.
- The discussion in Chapter VII Alternatives, under the Alternatives Considered but Eliminated from Further Analysis section of the EIR, has been revised.
- Table VII-4, Comparison of Alternatives to the proposed Housing Elements, has been revised to correct errata in the previously circulated EIR and to reflect refinements to the revised Chapter VII Alternatives analysis.

In addition, the Department has made conforming changes to Chapter II Executive Summary to reflect the revisions made in the revised Alternatives Chapter VII.

The Planning Department is soliciting public comment on the revised Chapter VII Alternatives at a public hearing on January 23, 2014. After the public hearing, our office will prepare and publish a document titled "Revised Chapter VII Alternatives: Responses to Comments," which will contain a summary of all relevant comments on the Chapter VII Alternatives and our responses to those comments, along with copies of the comment letters received and a transcript of the January 23, 2013 public hearing. Public agencies and members of the public who testify at the hearing on the revised Chapter VII Alternatives and provide their mailing address will automatically receive a copy of the Revised Chapter VII Alternatives Responses to Comments document, along with notice of the date reserved for certification of the FEIR with the revised chapter; others may receive a copy of the Revised Chapter VII Alternatives Responses to Comments document and notice by request or by visiting our office. This revised Chapter VII Alternatives, together with the revised Chapter VII Alternatives Responses to Comments document and the unchanged portions of the previous FEIR, will be considered by the Planning Commission in an advertised public meeting and then certified as a Final EIR if deemed adequate.

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

Thank you for your interest in this project.

II. EXECUTIVE SUMMARY

The following text on pages II-5 through II-6 of Chapter II Executive Summary has been revised to reflect changes made in the EIR in Chapter VII Alternatives.

SUMMARY OF PROJECT ALTERNATIVES

Three alternatives to the proposed Housing Elements have been evaluated. The alternatives considered include the following:

1. Alternative A: The No Project/Continuation of 1990 Residence Element Alternative: CEQA Guidelines Section 15126.6(e)(3)(A) provides that "when the project is the revision of an existing land use or regulatory plan, policy or ongoing operation, the 'no project' alternative will be the continuation of the existing plan, policy or operation into the future." Under Alternative A: the No Project/Continuation of 1990 Residence Element Alternative, the 1990 Residence Element policies would remain in effect and neither the proposed 2004 Housing Element nor the 2009 Housing Element policies would be adopted or implemented. Housing development in the City would continue as encouraged under the 1990 Residence Element. However, this alternative would assume the adoption of the Data and Needs Analysis and the updated RHNA allocation because for the Alternative to meet the project objectives of having a housing element that substantially complies with state housing element law, the proposed Housing Elements must meet the most recent regional housing needs assessment. The analysis of this alternative would allow the decision-makers to compare the impacts of approving either the 2004 or 2009 Housing Elements with the impacts of not approving either of the proposed Housing Elements.

   This EIR concludes that Alternative A could result in a potentially ***significant*** impact to historic resources, but would avoid the significant unavoidable impact on the transit network anticipated under the proposed project. The EIR also concludes that with respect to noise, Alternative A could result in a ***significant impact*** that can be mitigated to ***less than significant*** with implementation of M-NO-1.

2. Alternative B: 2004 Housing Element–Adjudicated: This alternative includes the objectives, policies and implementation measures of the 2004 Housing Element excepting policies that were stricken by the court in the appeal of the 2004 Housing Element. Similar to Alternative A, this alternative would use the most recently identified RHNA allocation and an updated Data and Needs Analysis.

   This EIR concludes that Alternative B could result in a ***significant and unavoidable*** impact to the City's transit network. The EIR also concludes that with respect to noise, Alternative B could result in a ***significant impact*** that can be mitigated to ***less than significant*** with implementation of M-NO-1.

3. Alternative C: 2009 Housing Element–Intensified: This alternative includes concepts that more actively encourage housing development through zoning accommodations. These concepts were generated based on ideas and alternative concepts raised over the course of outreach for the 2009 Housing Element preparation process, but which were ultimately not included in the 2009 Housing Element. These concepts are intended to encourage housing by: 1) allowing for limited expansion of allowable building envelope for developments meeting the City's affordable housing requirement on site with units of two or more bedrooms; 2) requiring development to the full allowable building envelope in locations that are directly on Transportation Effectiveness Project (TEP) rapid transit network lines; 3) giving height and/or density bonuses for development that exceeds affordable housing requirements in locations that are directly on TEP rapid transit network lines; 4) allowing height and/or density bonuses for 100 percent affordable housing in all areas of the City except in RH–1 and RH–2 zones; and 5) granting of administrative variances (i.e. over the counter) for reduced parking spaces if the development is: a) in an RH–2 zoning district that allows for greater residential density (e.g., adding a second unit without required parking); b) in an area where additional curb cuts would restrict parking in areas with parking shortages; or c) on a Transit Preferential Street.[1]

   This EIR concludes that Alternative C could result in a ***significant and unavoidable*** impact to the City's transit network. The EIR also concludes that with respect to noise, Alternative C could result in a ***significant impact*** that can be mitigated to ***less than significant*** with implementation of M-NO-1.

[1] Transportation Element, San Francisco General Plan.

VII. ALTERNATIVES

INTRODUCTION

Legislative Framework

In accordance with CEQA Guidelines Section 15126.6, EIRs are required to include a discussion of alternatives to a proposed project. Section 15126.6(a) states that an EIR should describe a range of reasonable alternatives to a project that would attain most of the basic objectives of a project while reducing one or more of the significant impacts of the project, and should evaluate the comparative merits of those alternatives.

Public Resources Code Section 21002 states, in pertinent part:

> *In determining the nature and scope of alternatives to be examined in an EIR, the Legislature has decreed that local agencies shall be guided by the doctrine of "feasibility." It is the policy of the state that public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects. In the event specific economic, social, or other conditions make infeasible such project alternatives or such mitigation measures, individual projects may be approved in spite of one or more significant effects thereof.*

California has declared that the statutory requirements for consideration of alternatives must be judged against a rule of reason. CEQA Guidelines Section 15126.6(f) defines the "Rule of Reason," which requires that an EIR set forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to those that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only those that the lead agency determines could feasibly attain most of the basic objectives of the project. Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR is (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to offer substantial environmental advantages over the project proposal (CEQA Guidelines Section 15126.6(c)).

CEQA Guidelines Section 15126.6(e)(1) requires an analysis of the No Project Alternative. The purpose of describing and analyzing the No Project Alternative is to allow decision-makers to compare the impacts of approving a project with the impacts of not approving a project. CEQA Guidelines Section 15126.6(e)(3)(A) provides that "when the project is the revision of an existing land use or regulatory plan, policy or ongoing operation, the 'no project' alternative will be the continuation of the existing plan, policy or operation into the future." The No Project Alternative in this section discusses future conditions if the proposed 2004 Housing Element and 2009 Housing Element policies would not replace the 1990 Residence Element policies.

CEQA Guidelines Section 15126.6(f)(1) states that "the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries (projects with a regionally significant impact should consider the regional context), and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent)."

Analytic Method

This section describes the alternatives and identifies potential environmental impacts associated with implementation of the alternatives relative to the impacts of the proposed Housing Elements. To identify reasonable alternatives to the proposed Housing Elements, the Lead Agency (City and County of San Francisco Planning Department) considered the objectives of the proposed Housing Elements, those alternatives that are feasible to accomplish, and those alternatives that could reduce the impacts of the proposed Housing Elements.

The general process for identifying alternatives for consideration in the document included these steps:

1. Review the EIR analysis for any significant effects resulting from the proposed Housing Elements and identify possible strategies to avoid or lessen impacts;

2. Review the California Court of Appeal decision regarding the Negative Declaration prepared for the 2004 Housing Element;

3. Review ideas and alternative concepts suggested during the Notice of Preparation Public Scoping Period or at other points during the 2009 Housing Element and DEIR preparation process; and

4. Select and refine a final set of alternatives for CEQA analysis.

From this process, two alternatives, in addition to the required No Project Alternative, were selected for further evaluation and comparison to the proposed Housing Elements. In addition, each Housing Element should be considered an alternative to the other Housing Element. Together, this set of four alternatives to each Housing Element represents a broad range of options for the public and decision-makers consideration in terms of shaping how new residential development should occur.

The 2004 Housing Element and 2009 Housing Element do not include any changes to the land use objectives and policies in the City's Area Plans or Redevelopment Plans. However, the proposed Housing Elements include the use of specific neighborhood and area plans as part of the planning process. For example, Policy 11.6 in the 2004 Housing Element encourages a "Better Neighborhoods type planning process," and Policy 1.4 of the 2009 Housing Element would "Ensure community based planning processes are used to generate changes to land use controls". Thus, while implementation of the proposed Housing Elements would not directly affect existing Area Plans or Redevelopment Plans, they would nonetheless guide future development within plan areas and throughout the City, and could influence the

uses within future plan areas, such as whether an area allows mixed-use development or residential uses only.

The Association of Bay Area Governments (ABAG), in coordination with the California Department of Housing and Community Development (HCD), uses population and job growth projections from the State Department of Finance to determine the regional housing needs for the Bay Area and allocates housing to cities and counties within the Bay Area through the Regional Housing Needs Assessment (RHNA). Currently, the City's household and population growth is generally consistent with ABAG's projections. The extent of housing development in the City is driven by population growth and market forces, coupled with the regulatory framework of zoning and project review processes. The Housing Element, as required by State law, is a policy document that allows the City to plan for the housing needs of its current and future population. The Housing Element does not *cause* housing growth, but it helps shape where and how such growth is likely to occur. In short, residential development in the City would occur regardless of the proposed Housing Elements. Housing element law was enacted to ensure that localities plan and make land available for new housing in all income categories.

The proposed Housing Elements are policy documents that provide direction for accommodating new housing, at all income levels, driven by population growth. In providing direction for meeting regional housing needs, ABAG focuses on both the amount of housing and the affordability of housing. San Francisco has demonstrated that there is adequate land available for residential development to accommodate the total RHNA. However, market-rate development, housing construction costs and other obstacles in San Francisco present a challenge for meeting the RHNA's affordability goals solely through new development, , and therefore the Housing Elements also emphasize the use of the existing housing stock to meet San Francisco's affordable housing goals. To meet the City's share of the RHNA, both proposed Housing Elements aim to do the following: 1) preserve and upgrade existing housing units to ensure they do not become dilapidated, abandoned, or unsound; and 2) provide direction for how and where new housing development in the City should occur. With respect to the latter, the 2004 Housing Element encourages new housing in Downtown and in underutilized commercial and industrial areas. The 2004 Housing Element also encourages increased housing in neighborhood commercial districts and mixed use districts near Downtown. On the other hand, the 2009 Housing Element encourages housing integrated into new commercial or institutional projects, locating housing projects near major transit lines, and accommodating housing through community planning efforts.

Although adoption of the proposed Housing Elements would not directly result in the construction of residential units, they would shape how and where new residential development should be encouraged and ensure that there is adequate land available to meet future housing needs.

PROJECT OBJECTIVES

As discussed in Section IV (Project Description), the objectives of the proposed Housing Elements are to:

1. Provide a vision for the City's housing and growth management through 2014;

2. Maintain the existing housing stock to serve housing needs;

3. Ensure capacity for the development of new housing to meet the RHNA at all income levels;

4. Encourage housing development where supported by existing or planned infrastructure, while maintaining existing neighborhood character;

5. Encourage, develop and maintain programs and policies to meet projected affordable housing needs;

6. Develop a vision for San Francisco that supports sustainable local, regional and state housing and environmental goals; and

7. Adopt a housing element that substantially complies with California housing element law as determined by the California Department of Housing and Community Development.

SELECTED ALTERNATIVES

Three potentially feasible alternatives to the proposed Housing Elements have been evaluated. The analysis of all three alternatives assumes compliance with State Housing Element Law, which requires that the City's Housing Element reflects the current RHNA and includes an up-to-date Data and Needs analysis. Therefore, under all alternatives, it is assumed that the 2009-2014 RHNA and Part I (Data and Needs Analysis) of the 2009 Housing Element are in effect. The potentially feasible alternatives considered include the following:

- **Alternative A: The No Project/Continuation of 1990 Residence Element Alternative.** CEQA Guidelines Section 15126.6(e)(3)(A) provides that "when the project is the revision of an existing land use or regulatory plan, policy or ongoing operation, the 'no project' alternative will be the continuation of the existing plan, policy or operation into the future." Under Alternative A: the No Project/Continuation of 1990 Residence Element Alternative, the 1990 Residence Element policies would remain in effect and neither the proposed 2004 Housing Element nor the 2009 Housing Element policies would be adopted or implemented. Housing development in the City would continue as encouraged under the 1990 Residence Element. However, this alternative would assume the adoption of the 2009 Data and Needs Analysis and the updated RHNA allocation. The analysis of this alternative would allow the decision-makers to compare the impacts of approving either the 2004 or 2009 Housing Elements with the impacts of not approving either of the proposed Housing Elements. For reference, a summary of the Alternative A objectives and policies are included in Appendix B-1 to this EIR.

- **Alternative B: 2004 Housing Element–Adjudicated.** This alternative includes the objectives, policies and implementation measures of the 2004 Housing Element excepting policies that were stricken by the superior court. Similar to Alternative A, this alternative would use the most

recently identified RHNA allocation[1] and an updated Data and Needs Analysis. For reference, Alternative B objectives and policies are included in Appendix B-4 to this EIR.

- **Alternative C: 2009 Housing Element–Intensified.** This alternative includes concepts that more actively encourage housing development through zoning accommodations. These concepts were generated based on ideas and alternative concepts raised over the course of outreach for the 2009 Housing Element preparation process, but which were ultimately not included in the 2009 Housing Element. These concepts are intended to encourage housing by: 1) allowing for limited expansion of allowable building envelope for developments meeting the City's affordable housing requirement on site with units of two or more bedrooms; 2) requiring development to the full allowable building envelope in locations that are directly on Transportation Effectiveness Project (TEP) rapid transit network lines; 3) giving height and/or density bonuses for development that exceeds affordable housing requirements in locations that are directly on TEP rapid transit network lines; 4) allowing height and/or density bonuses for 100 percent affordable housing in all areas of the City except in RH–1 and RH–2 zones; and 5) granting of administrative variances (i.e. over the counter) for reduced parking spaces if the development is: a) in an RH–2 zoning district that allows for greater residential density (e.g., adding a second unit without required parking); b) in an area where additional curb cuts would restrict parking in areas with parking shortages; or c) on a Transit Preferential Street.[2] For reference, Alternative C objectives and policies are included in Appendix B-5 to this EIR.

Under CEQA, an EIR may consider and analyze one or more alternatives at an equal level of detail, or may identify a preferred project, and include an analysis of alternatives at a lesser level of detail. This EIR incorporates both approaches, because in addition to the alternatives described above, it also evaluates both the 2004 Housing Element and the 2009 Housing Element at an equal level of detail. Either version of the Housing Element may be adopted by the Board of Supervisors, or the Board could adopt a version of the Housing Element that combines policies from the two, or policies from one of the other alternatives.

ANALYSIS OF PROJECT ALTERNATIVES

This section provides an analysis of the environmental impacts of each of the alternatives, comparing the potential impacts of the alternatives to the proposed Housing Elements' impacts (if any), and identifies the impacts that would result from implementation of the alternatives themselves. For purposes of comparison, the discussion of impacts for each of the alternatives is identified by both significance level and whether the impact is greater than, similar to, or less than the impact of the proposed Housing Elements, even if the level of significance for the alternative is not different than the proposed Housing Elements.

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1 See above.

2 Transportation Element, San Francisco General Plan.

This alternatives analysis is structured to compare the impacts of each alternative to the two project options: the 2004 Housing Element and the 2009 Housing Element. The analysis discusses the impacts on each environmental issue area resulting from the specific alternative (i.e., Alternative A, B, or C) and compares the impacts to each of the proposed Housing Elements. To limit redundancy, in cases where the impacts of the alternative are similar to *both* the 2004 and the 2009 Housing Element, the analysis is combined.

Table VII-1 presents a generalized summary of the policies of each alternative that have the potential for environmental impacts. Certain policies of Alternative B are shown in ~~strikethrough,~~ in accordance with the Superior Court's determination, and indicate those policies deleted from the 2004 Housing Element. It is noted that the policies listed below for Alternative C are in addition to the objectives, policies, implementation measures and strategies for further review of the 2009 Housing Element.

Development Assumptions by Alternative

As noted previously, adoption of the proposed Housing Elements would not directly result in the construction of residential units, but instead would shape how and where new residential development would occur, while ensuring there is adequate land available to meet future housing needs. The number of housing units that would be constructed under each of the project alternatives would be substantially similar, as each alternative reflects the housing needs and population projections provided by ABAG. However, each alternative could differ in terms of how and where housing development would occur.

The analysis of alternatives that follows this discussion is based on the following generalized assumptions regarding the location, density, and type of new housing anticipated under each alternative. These assumptions in turn are based on the policies and implementation strategies particular to each project alternative, as listed in Table VII-1, and the Planning Department's and other City department staff experience and expertise related to residential development in San Francisco.

Alternative A: The No Project/Continuation of 1990 Residence Element Alternative

Under Alternative A, new residential development would continue to be encouraged based on the objectives and policies included in the 1990 Residential Element, in concert with adoption of the 2009 RHNA and Needs Assessment. This would generally result in patterns of residential development that are relatively dispersed throughout the City, compared to the 2004 Housing Element or the 2009 Housing Element. This is due in part to the particular policies and implementation measures provided in the 1990 Residential Element. For example, Objective 2 (To increase the supply of housing without overcrowding or adversely affecting the prevailing character of existing neighborhoods) and associated Policy 2.4 (Adopt specific zoning districts which conform to a generalized residential land use and density plan and the Master Plan) generally promote new housing that is consistent with existing land use patterns, as specifically provided for on the residential land use density maps of the Master Plan (a.k.a., the General Plan). In addition, Policy 12.5 (Relate land use controls to the appropriate scale for new and existing residential areas) and Policy 2.1 (Set allowable densities in established residential areas at levels which

Table VII-1
Comparison of Policies with the Potential for Environmental Impacts

Alternative A No Project (1990 Residence Element)	Alternative B 2004 Housing Element-Adjudicated	Alternative C 2009 Housing Element-Intensified
Policies that direct growth to certain areas of the City		
Policy 2.1: Set allowable densities in established residential areas at levels which will promote compatibility with prevailing neighborhood character. Policy 2.2: Encourage higher residential density in areas adjacent to downtown, in underutilized commercial and industrial areas proposed for conversion to housing and in neighborhood commercial districts where higher density will not have harmful effects, especially if the higher density provides a significant number of units that are permanently affordable to lower income households.	Policy 1.1: Encourage higher residential density in areas adjacent to downtown, in underutilized commercial and industrial areas proposed for conversion to housing and in neighborhood commercial districts where higher density will not have harmful effects, especially if the higher density provides a significant number of units that are affordable to lower income households. ~~Set allowable densities in established residential areas at levels which will promote compatibility with prevailing neighborhood scale and character where there is neighborhood support.~~	5. Granting of administrative variances (i.e. over the counter) for reduced parking spaces if the development is: a. In an RH-2 zoning district (allows for greater residential density); b. In an area where additional curb cuts would restrict parking in areas with parking shortages; or c. On a Transit Preferential Street.
	~~Implementation Measure 1.1.1: A Citywide action plan (CAP) should provide a comprehensive framework for the allocation of higher density, mixed use residential development in transit rich areas with stable urban amenities in place. In these areas, specific CAP strategies should include: higher densities and reduced parking requirements in downtown areas or through a Better Neighborhoods type planning process; pedestrian oriented improvements to enhance the attractiveness and use of transit.~~	

Table VII-1
Comparison of Policies with the Potential for Environmental Impacts

Alternative A No Project (1990 Residence Element)	Alternative B 2004 Housing Element-Adjudicated	Alternative C 2009 Housing Element-Intensified
	~~Policy 1.2: Encourage housing development, particularly affordable housing, in neighborhood commercial areas without displacing existing jobs, particularly blue-collar jobs or discouraging new employment opportunities.~~	
	~~Implementation Measure 1.2.1: The Planning Department will develop proposals in neighborhood commercial districts (NCDs) well served by transit to strengthen their functions as a traditional "town center" for the surrounding residential districts.~~	
Policy 1.2: Facilitate the conversion of underused industrial and commercial areas to residential use, giving preference to permanently affordable housing uses.	Policy 1.3: Identify opportunities for housing and mixed-use districts near downtown and former industrial portions of the City.	
Implementation Measure 1.1.3: Inclusion of housing in Downtown.	Implementation Measure 1.3.1: ~~Downtown areas and areas subject to a Better Neighborhoods type planning process will be expected to absorb major office and residential developments over the next decade. Planning and zoning code changes should include floor-to-area ratio exemptions.~~ These development bonuses would be conferred only in cases where in return the development will provide major public benefits to the community.	

Table VII-1
Comparison of Policies with the Potential for Environmental Impacts

Alternative A No Project (1990 Residence Element)	Alternative B 2004 Housing Element-Adjudicated	Alternative C 2009 Housing Element-Intensified
	Implementation Measure 1.3.2: The Planning Department will introduce zoning changes in the traditionally industrial eastern parts of the City. The areas under study are: Mission, South of Market, Showplace Square/Potrero Hill, Bayview Hunter's Point, and Visitacion Valley. Housing, especially affordable housing, will be encouraged in former industrial areas where residential neighborhoods are established and urban amenities are in place or feasible.	
Policy 1.4: Locate in-fill housing on appropriate sites in established neighborhoods.	Policy 1.4: Locate in-fill housing on appropriate sites in established residential neighborhoods.	
	Policy 1.6: Create incentives for the inclusion of housing, particularly permanently affordable housing, in new commercial development projects.	
	~~Implementation Measure 1.6.2: The Planning Department and the Redevelopment Agency will propose increasing height limits, eliminating density requirements and modifying off-street parking requirements in the Transbay/Rincon Hill Redevelopment survey areas. The Mid-Market redevelopment survey area will be rezoning to include mixed-use residential areas and reduced residential parking requirements.~~	

Table VII-1 Comparison of Policies with the Potential for Environmental Impacts		
Alternative A No Project (1990 Residence Element)	**Alternative B 2004 Housing Element-Adjudicated**	**Alternative C 2009 Housing Element-Intensified**
	Implementation Measure 1.6.4: The Planning Department will update the Land Use Element to define areas for mixed-use development focused along transit corridors that are determined to be served by sufficient and reliable transit.	
	Implementation Measure 1.8.1: The Board of Supervisors has introduced Planning Code amendments to allow secondary units in new buildings that are in close proximity to neighborhood commercial districts and public transit.	2. Requiring development to the full allowable building envelope in locations that are directly on Transportation Effectiveness Project (TEP) rapid transit network lines.
	Implementation Measure 2.4.2: As part of the Planning Department's current citywide action plan, planning efforts in the eastern neighborhoods of the City, where housing exists in commercial and industrially zoned districts, should address housing retention as new policies and zoning are established. Mixed use should be encouraged where appropriate.	

Table VII-1
Comparison of Policies with the Potential for Environmental Impacts

Alternative A No Project (1990 Residence Element)	Alternative B 2004 Housing Element-Adjudicated	Alternative C 2009 Housing Element-Intensified
Implementation Measure 1.1.1: Aggressive pursuit of development opportunities [on] underused public sites. Implementation Measure 1.1.4: In-fill housing on vacant or underused sites.	Implementation Measure 4.1.4: The City will work to identify underutilized, vacant, and Brownfield sites that are publicly or privately owned and suitable for affordable housing development. The City will work with for profit and non-profit housing developers to acquire these sites for permanently affordable housing.	
	Implementation Measure 4.1.6: Permanently affordable housing sites will be especially sought out in places where transportation and existing amenities are in place.	3. Giving height and/or density bonuses for development that exceeds affordable housing requirements in locations that are directly on TEP rapid transit network lines.
Policy 12.5: Relate land use controls to the appropriate scale for new and existing residential areas.	~~Policy 11.6: Employ flexible land use controls in residential areas that can regulate inappropriately sized development in new neighborhoods, in downtown areas and in other areas through a Better Neighborhoods type planning process while maximizing the opportunity for housing near transit.~~	
Policies that promote increased density-related development standards		

	~~Implementation Measure 11.6.1: The City will continue to promote increased residential densities in areas well served by transit and neighborhood compatible development with the support and input from local neighborhoods.~~	
Policy 2.1: Set allowable densities in established residential areas at levels which will promote compatibility with prevailing neighborhood character. Policy 2.2: Encourage higher residential density in areas adjacent to downtown, in underutilized commercial and industrial areas proposed for conversion to housing and in neighborhood commercial districts where higher density will not have harmful effects, especially if the higher density provides a significant number of units that are permanently affordable to lower income households.	Policy 1.1: Encourage higher residential density in areas adjacent to downtown, in underutilized commercial and industrial areas proposed for conversion to housing and in neighborhood commercial districts where higher density will not have harmful effects, especially if the higher density provides a significant number of units that are affordable to lower income households. ~~Set allowable densities in established residential areas at levels which will promote compatibility with prevailing neighborhood scale and character where there is neighborhood support.~~	4. Allowing height and/or density bonus for 100 percent affordable housing in all areas of the City except in RH-1 and RH-2 zones.
	~~Implementation Measure 1.1.1: A Citywide action plan (CAP) should provide a comprehensive framework for the allocation of higher density, mixed use residential development in transit rich areas with stable urban amenities in place. In these areas, specific CAP strategies should include: higher densities and reduced parking requirements in downtown areas or through a Better Neighborhoods type planning process; pedestrian oriented improvements to enhance the attractiveness and use of transit.~~	

Implementation Measure 1.1.3: Inclusion of housing in Downtown (allowing housing to exceed permitted Floor-Area-Ratios [FARs] in C-3-G and C-3-S Districts).	Implementation Measure 1.3.1: ~~Downtown areas and areas subject to a Better Neighborhoods type planning process will be expected to absorb major office and residential developments over the next decade. Planning and zoning code changes should include floor-to-area ratio exemptions.~~ These development bonuses would be conferred only in cases where in return the development will provide major public benefits to the community.	
Policy 1.3: Create incentives for the inclusion of housing, particularly permanently affordable housing, in new commercial development projects.	Policy 1.6: Create incentives for the inclusion of housing, particularly permanently affordable housing, in new commercial development projects.	
	~~Implementation Measure 1.6.2: The Planning Department and the Redevelopment Agency will propose increasing height limits, eliminating density requirements and modifying off-street parking requirements in the Transbay/Rincon Hill Redevelopment survey areas. The Mid-Market redevelopment survey area will be rezoning to include mixed-use residential areas and reduced residential parking requirements.~~	
	~~Policy 1.7: Encourage and support the construction of quality, new family housing.~~	

	~~Implementation Measure 1.7.1: In response to the increasing number of families in San Francisco, the Planning Department will develop zoning amendments to require a minimum percentage of larger family units ranging from two to four bedrooms, in new major residential projects. The Planning Department will also propose eliminating density requirements within permitted building envelopes in downtown areas and areas subject to a Better Neighborhoods type planning process to maximize family units constructed.~~	
Policy 1.5: Allow new secondary units in areas where their effects can be dealt with and there is neighborhood support, especially if that housing is made permanently affordable to lower income households.	Policy 1.8: Allow new secondary units in areas where their effects can be dealt with and there is neighborhood support, especially if that housing is made permanently affordable to lower income households.	
	Implementation Measure 1.8.1: The Board of Supervisors has introduced Planning Code amendments to allow secondary units in new buildings that are in close proximity to neighborhood commercial districts and public transit.	
	Implementation Measure 1.8.3: On-going planning will propose Planning Code amendments to encourage secondary units where appropriate.	
Policy 7.3: Grant density bonuses for construction of affordable or senior housing.	Policy 4.4: Consider granting density bonuses ~~and parking requirement exemptions~~ for the construction of affordable housing or senior housing.	

	Implementation Measure 4.4.1: The Planning Department will look at establishing uniform density bonus standards and equal requirements for affordable and senior housing development. Until then, affordable and senior housing will continue to be granted density bonuses and reduced parking requirements on a case-by-case basis.	
Policy 2.3: Allow flexibility in the number and size of units within permitted volumes of larger multi unit structures, especially if the flexibility results in creation of a significant number of dwelling units that are permanently affordable to lower income households.	Policy 4.5: Allow greater flexibility in the number and size of units within established building envelopes, potentially increasing the number of affordable units in multi-family structures.	1. Allowing for limited expansion of allowable building envelope for developments meeting the City's affordable housing requirement on site with units of two or more bedrooms.
Policy 12.5 Relate land use controls to the appropriate scale for new and existing residential areas.	~~Policy 11.6: Employ flexible land use controls in residential areas that can regulate inappropriately sized development in new neighborhoods, in downtown areas, and in other areas through a Better Neighborhoods type planning process while maximizing the opportunity for housing near transit.~~	
	~~Implementation Measure 11.6.1: The City will continue to promote increased residential densities in areas well served by transit and neighborhood compatible development with the support and input from local neighborhoods.~~	
	~~Policy 11.7: Where there is neighborhood support, reduce of remove minimum parking requirements for housing, increasing the amount of lot area available for housing units.~~	

	~~Implementation Measure 11.7.1: The Planning Department will work to reduce parking in older neighborhoods through a Better Neighborhoods type planning process with the support and input from local neighborhoods.~~	
	~~Policy 11.8: Strongly encourage project sponsors to take full advantage of allowable building densities in their housing developments while remaining consistent with neighborhood character.~~	
Policy 2.1: Set allowable densities in established residential areas at levels which will promote compatibility with prevailing neighborhood character.	~~Policy 11.9: Set allowable densities and parking standards in residential areas at levels that promote the City's overall housing objectives while respecting neighborhood scale and character.~~	

[1] *The intent of this list is to list all policies of Housing Element Alternatives A, B, and C with the potential to have physical impacts on the environment. Any policies not listed here that also may have physical impacts on the environment are likely to have substantially the same impacts as the policies included herein.*

[2] *The Housing Elements contain additional themes beyond what is presented in this table. However, those themes, which include (but are not limited to) Homelessness, Housing Condition, Seismic Safety, and Displacement, do not have associated policies that would result in potential environmental impacts.*

will promote compatibility with prevailing neighborhood character) also promote residential development that generally would harmonize with existing density patterns.

2004 Housing Element Comparison

In contrast, the 2004 Housing Element promotes housing in commercial and industrial areas, neighborhood commercial districts, housing near the Downtown (Policy 1.1), along transit corridors (Implementation Measure 1.6.1), and on underutilized, vacant, surplus lands and on Brownfield sites (Implementation Measure 4.1.4). Such policies that direct growth to these areas of the City could promote housing within areas predominantly characterized by non-residential uses (especially commercial and industrial areas). The 2004 Housing Element also promotes increased density by reducing or eliminating minimum density restrictions (Implementation Measure 1.3.1), eliminating density requirements (Implementation Measure 1.7.1), reducing parking requirements (Policy 11.7), (which can reduce the amount of space per parcel devoted to parking and increase the amount of space available for housing units); and support for secondary units (which could increase the number of second housing units in San Francisco) (Policy 1.8) and flexible land use controls (Policy 11.6). The anticipated increase in the density of residential housing under the 2004 Housing Element is detailed under Impact LU-2 in *Section V.B, Land Use and Land Use Planning.* Together or individually, these housing policies could introduce higher density development in certain areas of the City. However, because the adoption of the 2004 Housing Element does not include any changes to allowable land uses or building heights and bulk – and new residential projects would continue to be constrained by these existing controls – total development potential under the 2004 Housing Element would not be substantially greater than that under the 1990 Residence Element policies. Rather, 2004 Housing Element policies would support and encourage development concentrated in certain areas, rather than distributed throughout the City pursuant to the 1990 Residence Element policies.

2009 Housing Element Comparison

Compared to Alternative A, the 2009 Housing Element promotes housing near transit (Policy 13.1) and other infrastructure (Policy 4.6), and in proximity to neighborhood services, such as open space and child care (Policy 12.2). The 2009 Housing Element also promotes housing on underused, vacant and surplus lands, and housing within mixed-use neighborhoods and within mixed use developments (Policy 1.8). The 2009 Housing Element generally promotes increased residential density in areas where there has been a community planning process (Policy 1.4), encouragement of affordable housing (e.g., Policy 1.3 and Policy 7.5), and through strategies designed to reduce the amount of space required for non-housing functions (e.g., reduced parking area via Implementation Measure 12). Citywide the 2009 Housing Element does not, overall, promote increased residential densities more so than the 1990 Residence Element policies. The 2009 Housing Element promotes increased densities mostly as a strategy to be pursued during community planning processes and near transit. The anticipated changes to residential development patterns resulting from the 2009 Housing Element are further detailed under Impact LU-2 in *Section V.B, Land Use and Land Use Planning.*

In sum, for purposes of this EIR alternatives analysis, it is assumed that new housing development under Alternative A would generally result in patterns of residential development that are relatively dispersed

throughout the City, consistent with existing land use and density patterns, particularly as compared to the 2004 Housing Element or the 2009 Housing Element.

Alternative B: 2004 Housing Element–Adjudicated

New residential development patterns under Alternative B would generally be similar to those under the 2004 Housing Element. As listed in Table VII-1, Alternative B policies and implementation measures that mirror the 2004 Housing Element would similarly encourage new housing Downtown, in underutilized commercial and industrial areas, in all new commercial or institutional projects, near major transit lines, and through community planning efforts. Additionally, both the 2004 Housing Element and Alternative B would encourage increased housing in neighborhood commercial districts and mixed-use districts near Downtown.

2004 Housing Element Comparison

Due to the various policies and implementation measures included in the 2004 Housing Element but eliminated under Alternative B, density would not increase to the same extent under this Alternative. As shown in Table VII-1, Policies and Implementation Measures eliminated from Alternative B include Implementation Measure 1.1.1 (provide a framework for higher density development), Implementation Measure 1.3.1 (changes to floor to area ratio exemptions), Implementation Measure 1.6.2 (increasing height limits, reduced parking requirements), Policy 11.6 and Implementation Measure 11.6.1 (promote housing density near transit), and Policy 11.7 and Implementation Measure 11.7.1 (reduce minimum parking requirements). As a result, residential density could increase under Alternative B compared to existing densities, but potentially less so than under the 2004 Housing Element. However, the reduction in density is expected to affect the density of individual buildings rather than the number of buildings constructed. In other words, under both the 2004 Housing Element and Alternative B, similar numbers of buildings are likely to be constructed; however, policies in the 2004 Housing Element would encourage each building to include more units.

2009 Housing Element Comparison

Similar to the 2009 Housing Element, Alternative B policies and implementation strategies listed in Table VII-1 would encourage housing integrated into all new commercial or institutional projects (Policy 1.6), near major transit lines (Implementation Measure 1.6.4), and through community planning efforts (Implementation Measure 1.3.2). However, Alternative B would not increase density to the same extent as the 2009 Housing Element, due to the elimination of policies 1.2, 11.6, and 11.7 and implementation measures 1.1.1, 1.3.1, 1.6.2., and 11.1.1 (Table VII-1 and VII-2), and due to the inclusion of density-promoting policies included in the 2009 Housing Element (see Table IV-8 Policies 1.4, 1.5, 1.6, 7.5, and 11.4). Thus, the overall effect of Alternative B, as compared to the 2009 Housing Element, is housing development that could be relatively less dense because housing would not be encouraged in new commercial and institutional projects, near major transit lines, or in community plans.

In sum, for purposes of this EIR's alternatives analysis, it is assumed that new housing development under Alternative B would be encouraged Downtown, in underutilized commercial and industrial areas, in all new commercial or institutional projects, near major transit lines, and through community planning efforts. Additionally, Alternative B would encourage increased housing in neighborhood commercial districts and mixed-use districts near Downtown, but to a lesser degree than the 2004 or 2009 Housing Element.

Alternative C: 2009 Housing Element–Intensified

New housing development under Alternative C would be similar to that which would occur under the 2004 Housing Element and 2009 Housing Element. However, the intensified development concepts 1 through 5 provided under Alternative C would promote increased density and building mass to a greater extent than the 2004 and 2009 Housing Elements. Total new housing units would remain within ABAG projections.

Alternative C development concept 1 would promote intensified site development that meets specified affordable housing requirements. Alternative C concepts 2 and 3 specifically direct growth along transit lines, while concepts 4 and 5 direct growth more generally throughout the City. Similar to the 2004 Housing Element, polices provided under Alternative C would encourage housing on public lands and in secondary units, and would promote housing opportunities that would avoid displacement of existing or affordable housing

Similar to the 2004 and 2009 Housing Elements, Alternative C's intensified development concepts would direct growth to specified areas of the City to a greater degree than the 1990 Residence Element. However, the development concepts under Alternative C would also more aggressively encourage increased residential development along transit lines (concepts 2, 3, and 5) and generally throughout the City (concepts 1, 4, and 5) compared to the 2004 and 2009 Housing Elements.

In sum, for purposes of this EIR's alternative analysis, it is assumed that new housing development under Alternative C would locate in the same areas as under the 2004 and 2009 Housing Elements (e.g., along transit lines) and that any new development would likely include taller residential buildings, which can accommodate higher densities of residential uses.

Alternative A: No Project

CEQA Guidelines Section 15126.6(e)(3)(A) provides that "when the project is the revision of an existing land use or regulatory plan, policy or ongoing operation, the 'no project' alternative will be the continuation of the existing plan, policy or operation into the future." Under Alternative A: No Project, the 1990 Residence Element policies would remain in effect and the proposed 2004 Housing Element and 2009 Housing Element policies would not be implemented. Housing development in the City would continue as encouraged under the policies in the 1990 Residence Element. This analysis will allow the decision-makers to compare the impacts of approving one of the updated Housing Elements with the impacts of not approving either, while still meeting the goals of the most recent RHNA.

The No Project Alternative (Alternative A) assumes that the City would comply with state housing element law, which mandates the inclusion of an updated housing element in the City's General Plan. Thus, the No Project Alternative includes the objectives and policies contained in the 1990 Residence Element coupled with the most recently identified RHNA allocation and an updated Data and Needs Analysis.

Land Use

Similar to the 2004 Housing Element and 2009 Housing Element, Alternative A would not include any extensions of roadways or other development features through a currently developed area that could physically divide an established community. Areas for future housing development would occur primarily as infill development on individual underutilized or vacant parcels, and most future housing development would take place in established neighborhoods, with the exception of recently rezoned plan areas where such rezoning has substantially increased development capacity (e.g., Bayview/Hunters Point Redevelopment Project and Treasure Island). Promoting housing in recently rezoned Plan Areas would likely encourage build out of those areas, as anticipated under those plans. With respect to impacts from the division of a community, the policies in Alternative A would be similar to the policies in the 2004 Housing Element and 2009 Housing Element, which encourage additional residential growth in established areas, subject to established land use plans. As with the 2004 and 2009 Housing Elements, under Alternative A there would be ***no impact*** on land use from physically dividing an established community.

2004 Housing Element Comparison

Similar to the 2004 Housing Element, new development under Alternative A would be subject to the controls in existing Area Plans and Redevelopment Plans, and would serve to complement – and not conflict with – the policies and land uses in an Area Plan or Redevelopment Plan. Additionally, the policies in Alternative A would not conflict with any regional land use policies, the Regional Transportation Plan, or prevailing local plans, including San Francisco Bay Conservation and Development Commission (BCDC) policies, San Francisco planning policies (General Plan, Countywide Transportation Plan, Municipal Transportation Agency [MTA] Strategic Plan, Bicycle Plan, and Urban Forest Plan) for reasons substantially similar to those discussed in this EIR under Impact LU-1 in *Section V.B, Land Use and Land Use Planning*.

The 2004 Housing Element encourages new housing in Downtown, in underutilized commercial and industrial areas, and increased housing in neighborhood commercial districts and mixed-use districts near Downtown. As detailed in Impact LU-2 in *Section V.B, Land Use and Land Use Planning*, the 2004 Housing Element could affect neighborhood character by incrementally increasing allowable residential densities, and through policies that encourage residential development in areas of the City that have been historically non-residential, thus increasing the potential for land use conflicts. Alternative A does not include the same policies of the 2004 Housing Element, and would not increase residential densities to the same extent or identify particular locations that would provide housing opportunities. Instead, Alternative A promotes housing opportunities more generally throughout the entire City and not specifically to a

given location, and does not include policies that encourage residential development where housing is not the predominant existing land use. Because development would continue to be introduced similar to historic patterns under Alternative A, the potential for land use conflicts would be less than under the 2004 Housing Element. Therefore, Alternative A could result in incrementally fewer potential land use impacts than the 2004 Housing Element. However, similar to the 2004 Housing Element, overall impacts related to land use would be ***less than significant.***

2009 Housing Element Comparison

Similar to new development under the 2009 Housing Element, new development under Alternative A would be subject to the controls in existing Area Plans and Redevelopment Plans and would not substantially conflict with the existing policies and land uses in current Area Plans or Redevelopment Plans. Additionally, Alternative A would not conflict with any regional land use policies, the Regional Transportation Plan, or prevailing local plans, including BCDC policies, San Francisco planning policies (General Plan, Countywide Transportation Plan, MTA Strategic Plan, Bicycle Plan, and Urban Forest Plan) for reasons substantially similar to those discussed under Impact LU-1 in *Section V.B, Land Use and Land Use Planning.*

As detailed in the discussion of neighborhood character under Impact LU-2 in *Section V.B, Land Use and Land Use Planning,* the 2009 Housing Element encourages housing integrated into all new commercial or institutional projects, near major transit lines, and through community planning efforts. This encouragement for housing development, which could result in some land use conflicts, could occur to a greater extent under Alternative A than under the 2009 Housing Element because Alternative A encourages housing throughout the City (and not just along transit lines or in new commercial or institutional projects) and according to historical patterns. Thus, compared to the 2009 Housing Element, Alternative A could incrementally increase the likelihood of potential land use conflicts due to the encouragement of housing in more locations (and potentially in locations where land use conflicts might result). Therefore, impacts related to land use conflicts could be incrementally greater under Alternative A than the 2009 Housing Element. However, as discussed on page V.B-59, any new residential development would be required to be developed in accordance with the City's Residential Design Guidelines, the Urban Design Element of the General Plan and Chapter 35 of the City's Administrative Code, which further reduces the potential for incompatibility of uses to result in significant land use impacts. Therefore, similar to the 2009 Housing Element, impacts related to land use under Alternative A would be ***less than significant.***

Aesthetics

2004 Housing Element Comparison

As noted in the prior discussion of *Development Assumptions by Alternative*, Alternative A promotes increased density to a lesser extent than the 2004 Housing Element because the 2004 Housing Element contains more aggressive strategies to promote density. As a result, Alternative A could result in smaller buildings overall. If fewer numbers of taller residential buildings are constructed, Alternative A would

result in incrementally fewer potential impacts to scenic vistas, visual resources, and visual character compared to the 2004 Housing Element (refer to Impacts AE-1, AE-2, and AE-3 in *Section V.C. Aesthetics*). Both Alternative A and the 2004 Housing Element promote development on surplus vacant lands to a similar degree. However, under Alternative A, it is anticipated that fewer new, high density buildings would be constructed than under the 2004 Housing Element because Alternative A does not as aggressively promote full build out of the allowable building envelope. Because new taller, high density buildings tend to have more sources of light at higher elevations, thereby increasing the visibility of that light, and larger expanses of glass compared to typical residential uses, Alternative A could result in less additional light and glare from new residential sources than the 2004 Housing Element (refer to Impact AE-4 in *Section V.C. Aesthetics*). Therefore, the impact on aesthetics from new development under Alternative A would be ***less than significant***, and incrementally less than the potential impacts under the 2004 Housing Element.

2009 Housing Element Comparison

As noted previously in the discussion of *Development Assumptions by Alternative*, Alternative A promotes increased growth more generally throughout the entire City than the 2009 Housing Element, which promotes increased density only for affordable housing projects and through community planning projects. Therefore, compared to the 2009 Housing Element, Alternative A could result in more developments built to the maximum building heights more generally citywide, potentially increasing the height and number of new developments that affect a scenic vista (Impact AE-1 *Section V.C. Aesthetics*). In addition, impacts to scenic resources could be incrementally greater under Alternative A than under the 2009 Housing Element (Impact AE-2 in *Section V.C. Aesthetics*). Alternative A includes policies and guidelines for development that are intended to preserve neighborhood character and protect existing visual character, resulting in impacts similar to the 2009 Housing Element (Impact AE-3 in *Section V.C Aesthetics*). Under Alternative A, new housing units constructed throughout the City to the maximum building envelope could result in an incremental increase in the likelihood of light and glare impacts from new sources compared to the 2009 Housing Element (refer to Impact AE-4 in *Section V.C. Aesthetics*). Overall, the aesthetic impacts of Alternative A would increase slightly compared to the impacts of the 2009 Housing Element. It should be noted, however, that significant impacts to visual resources are rare for urban infill projects, as it is unusual for them to have the potential to result in substantial adverse effects under CEQA's significance criteria. Furthermore, because new development would be required to comply with the Urban Design Element of the General Plan, intended to accommodate new development within allowable height and bulk without adversely affecting identified scenic vistas, and because new development would be required to comply with Planning Code Section 311, the Residential Design Guidelines, and City Resolution 9212, aesthetic impacts of Alternative A would remain ***less than significant.***

Population and Housing

Similar to the 2004 Housing Element and 2009 Housing Element, residential development in the City would occur regardless of the policies contained in Alternative A or the proposed 2004 and 2009 Housing Elements (see discussion of population growth under Impact PH-1 in *Section V.D. Population and*

Housing). Additionally, under existing zoning, the City has available capacity to meet the total number of units identified in the RHNA[3]. Thus, similar to the 2004 Housing Element and 2009 Housing Element, development under policies contained in Alternative A would not trigger the need for roadway expansions or result in the extension of infrastructure into previously unserved areas, which could in turn induce substantial population growth, for the same reasons discussed under Impact PH-1 in *Section V.D Population and Housing*. Also similar to the 2004 Housing Element and 2009 Housing Element, the policies under Alternative A would not cause a substantial change in the workers-to-household ratio that would occur between 2005 and 2025, and there would be no impact to the City's jobs/housing balance (Impact PH-1).

2004 Housing Element Comparison

As discussed above under *Development Assumptions by Alternative,* similar to the 2004 Housing Element, Alternative A encourages new housing in Downtown, in underutilized commercial and industrial areas, and increased amounts of housing in neighborhood commercial districts and mixed-use districts near Downtown. However, as noted previously, Alternative A encourages increased density to a lesser extent than the 2004 Housing Element.

Alternative A would not result in substantial impacts related to the displacement of existing housing or creating demand for housing (Impact PH-2), or substantial impacts related to displacement of people (Impact PH-3), for similar reasons provided in *Section V.D. Population and Housing* under the impact analysis of these issues for the 2004 Housing Element. As noted in that section, similar to the 2004 Housing Element, compliance with existing Planning and Building Code requirements would minimize the potential to displace housing or people. Further, because the Housing Element does not *cause* housing growth, no additional demand for housing would occur as a result of Alternative A. Overall, similar to the 2004 Housing Element, impacts related to population and housing under Alternative A would be ***less than significant.***

2009 Housing Element Comparison

As discussed previously, the 2009 Housing Element encourages housing integrated into all new commercial or institutional projects, near major transit lines, and through community planning efforts. In contrast, Alternative A would promote increased housing on a broader, citywide scale to a greater extent because the policies of the 2009 Housing Element promote housing at limited locations in the City Alternative A would not result in substantial impacts related to the displacement of existing housing or creating demand for housing (Impact PH-2), or substantial impacts related to displacement of people (Impact PH-3), for similar reasons provided in *Section V.D. Population and Housing* under the impact analysis of these issues for the 2009 Housing Element. As noted in that section, similar to the 2009 Housing Element, compliance with existing Planning and Building Code requirements would minimize the potential to displace housing or people. Further, because the Housing Element does not *cause* housing

[3] *City and County of San Francisco, Planning Department, Draft Housing Element, Part I: Data and Needs Analysis, April 2009, at page 82.*

growth, no additional demand for housing would occur as a result of adopting Alternative A. Overall, similar to the 2009 Housing Element, impacts related to population and housing under Alternative A would be ***less than significant.***

Cultural Resources

2004 and 2009 Housing Elements Comparison

Similar to the 2004 and 2009 Housing Elements, Alternative A could result in a substantial adverse change to a historical resource by encouraging housing which results in inappropriate alterations and/or additions, inappropriate new construction, and demolition by neglect. That is, Alternative A could result in residential development that includes inappropriate alterations or additions to existing housing, or new construction that detracts from the historical or cultural significance of an existing building or area. In addition to impacts on individual properties, cumulative impacts could arise in certain areas over the course of time thereby diminishing the historic significance of the area.

Similar to the 2004 and 2009 Housing Elements, under Alternative A new construction, alterations, and demolitions would be required to undergo environmental review to determine if there are any impacts to historic resources which require mitigation or consideration of alternatives. In addition, the City has well-established review criteria and procedures to evaluate impacts to historic resources at the project level. For this and other similar reasons detailed under Impact CP-1 in *Section V.E. Cultural and Paleontological Resources*, Alternative A would not permit any new development or exempt any future projects from review for impacts to historic resources.

However, the policies in Alternative A reflect the historic preservation context of two decades ago, prior to substantial changes in both the City's approach to historic preservation and the requirements for review of historical resource impacts under CEQA. The Data and Needs Analysis supporting the 1990 Housing Element considered sites occupied by vacant, abandoned, and underutilized buildings as potential sites for residential development.[4] Many of these buildings are now considered potential historical resources under CEQA, and as a result the Data and Needs Analysis for the 2004 Housing Element specifically excluded properties with any substantial development from its identification of potential housing opportunity sites: "The Planning Department limited its assessment of potentially developable land to such sites with little or no lot improvements" (2004 Housing Element, p. 90). The conclusion that the policies in the 1990 Housing Element were adequate to accomplish the City's RHNA goals reflected the assumption that historical resources could represent housing opportunity sites. Therefore, if the 1990 Housing Element policies were in place, the City would either have a decreased ability to meet the RHNA, or there would be greater risk to historical resources if in fact development of these sites were pursued rather than the more targeted sites identified to support the 2004 or 2009 Housing Element documents.

[4] *The 1990 Housing Element includes "Soft Sites" in its definition of "Housing Opportunity Sites." "Soft Sites" are defined as sites which include older vacant buildings, unsafe buildings, and buildings and uses which underutilize the site.*

Because Alternative A does not contain policies that identify and protect historic resources to the same degree as either the 2004 or 2009 Housing Element, Alternative A could result in an incremental increase in historic resource impacts. While the 2004 and 2009 Housing Elements and Alternative A would protect landmark buildings and other historical resources to a similar degree, the 2004 and 2009 Housing Elements take a substantially more aggressive approach toward protecting historical resources by identifying them through comprehensive survey work and updating the City's Preservation Element (see 2004 Housing Element Policy 3.6 and corresponding Implementation Measures and 2009 Housing Element Policies 11.6 and Implementation Measures 81, 82, and 83). Section 15064.5 of the CEQA Guidelines specifies that any project that causes a substantial adverse change to a historical resource (e.g. through demolition or inappropriate addition) is a project that has a significant impact; therefore, if Alternative A incrementally increases the potential for development that is incompatible with surrounding historic buildings due to the absence of policies that identify and protect historic resources, such development could result in a significant impact on the environment. While the City's review procedures for historic resources would continue to act as a disincentive for such proposals, they do not prohibit changes that could result in impacts and any increase in the potential for impacts to a historic resource at a programmatic level would be significant under CEQA. Therefore, Alternative A could result in greater impacts on historic resources than the 2004 and 2009 Housing Element.

For reasons similar to those provided under Impact CP-2 and CP-3 in *Section V.E. Cultural and Paleontological Resources addressing the 2004 and 2009 Housing Elements*, development under Alternative A could result in a substantial adverse change to an archeological or paleontological resource. That is, impacts to archeological and paleontological resources could result due to the increase in density of development, which would result in incrementally heavier buildings with a greater potential to require deep foundations or soil improvements, by causing soils disturbance, or by directing housing to areas with a potential for archeological or paleontological deposits near the surface. As discussed under Impact CP-2 for both the 2004 and 2009 Housing Elements, the City's established review procedures ensure that any potential to affect archeological resources at the project-level can be addressed and reduced to a less-than significant level. Such procedures would also be applicable under Alternative A. Similarly, potential impacts of the 2004 and 2009 Housing Elements on paleontological resources discussed under Impact CP-3 would be subject to existing regulations, including the National Historic Preservation Act, and would also apply under Alternative A. Therefore, similar to the 2004 and 2009 Housing Elements, impacts of Alternative A on archeological and paleontological resources would be ***less than significant.***

Similar to the 2004 and 2009 Housing Elements, Alternative A would have the potential to disturb human remains. As discussed under Impact CP-4 in *Section V.E. Cultural and Paleontological Resources*, existing regulations, including Sections 7050.5, 7051, and 7054 of the California Health and Safety Code and Public Resource Code Section 5097.8 would address such impacts. Such regulations would also apply to new buildings development under Alternative A. Thus, similar to the 2004 and 2009 Housing Elements, this impact would be ***less than significant*** under Alternative A.

Overall, due to the fact that potential impacts to historic buildings could be somewhat greater than under Alternative A than under the 2004 and 2009 Housing Elements because Alternative A does not emphasize and prioritize the identification of the City's historic resources, there is a greater potential for such resources to be indirectly affected by, for example, development of housing that is not compatible with a surrounding historic district. Therefore, under Alternative A, impacts to cultural resources would be ***potentially significant.***

Transportation and Circulation

2004 and 2009 Housing Elements Comparison

Growth in Certain Areas

Alternative A (the 1990 Residence Element) contains Policy 2.2, which encourages higher residential density in areas adjacent to Downtown, in underutilized commercial and industrial areas, and in neighborhood commercial districts. Although the 2004 and 2009 Housing Elements contain similar policies directing higher densities to these general areas, increases in density under Alternative A would be less than increases encouraged by the policies in the 2004 and 2009 Housing Elements, as discussed above under the *Development Assumptions by Alternative*. It is therefore anticipated that under Alternative A, less future housing growth would occur in proximity to these job cores, services and/or along transit lines. As discussed in the analysis of the 2004 and 2009 Housing Elements under Impact TR-1 in *Section V.F. Transportation and Circulation*, policies that promote housing development close to jobs and services and/or along transit lines are intended to reduce citywide vehicle trips by promoting the ability to use alternative modes of transportation, including transit, bicycling and walking. Thus, without these policies that encourage housing near jobs and transit, it is more likely that the 37 intersections anticipated to operate at unacceptable levels of service under future 2025 Cumulative Conditions (refer to Table V.F-1 in *Section V.F. Transportation and Circulation*) would continue to operate unacceptably.

Policies in Alternative A would not encourage a mode shift to transit or alternative transportation options as strongly as either the 2004 or 2009 Housing Element. This is because Alternative A does not include policies provided in the 2004 and 2009 Housing Elements that promote housing development in areas along transit lines or on transit streets. Thus, unlike the proposed 2004 and 2009 Housing Elements, Alternative A would not increase the likelihood of exceeding Muni's capacity utilization standard of 85 percent. Therefore, Alternative A is expected to have a ***less than significant*** impact on the transit system under 2025 Cumulative Conditions, and would avoid the significant and unavoidable transit impact anticipated to occur from the 2004 and 2009 Housing Elements.

Parking Requirements

Alternative A does not contain any policies intended to reduce parking requirements or reduce the need for residential parking by explicitly promoting housing near transit. Parking-related policies are included in the 2004 and 2009 Housing Elements because reduced parking in residential projects reduces the construction cost and, in turn, the price of individual units, and can provide more space in buildings for

residential or commercial uses. As discussed in the Transportation Impact Study (TIS), a reduced parking requirement is also a transportation strategy designed to shift modes of transportation to transit, bicycling or walking. It is therefore anticipated that maintaining the current parking provisions would increase the number of vehicle trips citywide above those levels anticipated under the 2004 and 2009 Housing Elements, but not in excess of those anticipated under future 2025 Cumulative Conditions. Therefore, it is more likely that the 37 intersections anticipated to operate at unacceptable levels of service under future 2025 Cumulative Conditions would continue to operate unacceptably under Alternative A, though similar to the 2004 and 2009 Housing Elements the impact to these intersections would be less than significant.

Residential Density Provisions

As noted previously, the 2004 Housing Element includes policies that aim to increase residential density to a greater degree than Alternative A. As discussed above under *Development Assumptions by Alternative*, compared with the 2009 Housing Element, Alternative A promotes increased density on a broader, citywide scale. While the 2009 Housing Element contains policies that would increase residential density, it does so through more limited means (for affordable housing and through community planning processes) than the 2004 Housing Element. As discussed in the TIS, increased residential density is correlated with reduced auto ownership and reduced VMT, resulting in overall beneficial impacts to the City transportation network. Therefore, the 2004 Housing Element would provide more beneficial impacts to the City transportation network by promoting greater increased density compared to Alternative A. In contrast, increased housing densities associated with Alternative A and the 2009 Housing Element would overall provide roughly similar benefits to the transportation network by reducing auto ownership rates and associated vehicle trips. Similar to both the 2004 and 2009 Housing Elements, Alternative A would not be anticipated to affect the City's future roadway network under 2025 Cumulative conditions because it would not generate any new trips not already projected under cumulative conditions.

Conclusion

As discussed above, Alternative A can be expected to result in an overall increase in citywide vehicle trips as compared to the 2004 and 2009 Housing Elements because the location and density of new housing development under Alternative A does not encourage the use of alternative transportation to the same degree as the 2004 and 2009 Housing Elements. However, the effects of future development on the roadway network under Alternative A would not be expected to exceed projected 2025 Cumulative Conditions because Alternative A does not propose any new residential development and therefore would not directly generate any new person trips.

Additionally, Alternative A is not anticipated to affect projected 2025 Cumulative transit conditions (i.e., Muni ridership rates) and therefore would not have a significant impact on the City transit system because unlike the 2004 or 2009 Housing Elements, Alternative A does not encourage new housing near transit and does not reduce residential parking requirements that could result in an increased use of alternative transportation modes. Therefore, Alternative A would have a ***less than significant*** transit impact and would thus avoid the significant unavoidable transit impact anticipated under the 2004 and 2009 Housing

Elements (refer to Impact TR-1 in *Section V.F. Transportation and Circulation*). However, similar to the 2004 and 2009 Housing Elements, Alternative A would have ***no impact*** on citywide pedestrian or bicycle facilities, loading areas, emergency vehicle access, or impacts from construction for the same reasons as discussed in the analysis of the 2004 and 2009 Housing Elements under Impact TR-1 in *Section V.F. Transportation and Circulation.*

Noise

Similar to the conditions under the 2004 Housing Element and 2009 Housing Element, the City is neither within an airport land use plan area, nor within two miles of a public airport or public use airport, nor within the vicinity of a private airstrip. Therefore, Alternative A would have ***no impact*** with respect to airport noise.

2004 Housing Element Comparison

Alternative A promotes density to a lesser degree than the 2004 Housing Element. While the overall amount of new housing units constructed would be similar, the reduced density under Alternative A could result in less intensive noise-generating activity during construction due to the smaller scale of individual housing projects. Similar to the 2004 Housing Element, Alternative A would not result in an increase in the number of projects involving demolition, which would create demolition-related noise; both Alternative A and the 2004 Housing Element similarly recognize the need for the retention and maintenance of existing housing. Therefore, for reasons similar to the analysis of the 2004 Housing Element provided under Impact NO-1 in *Section V.G. Noise* (e.g. compliance with the City's noise ordinance), while the temporary noise impact from new housing construction under Alternative A could be incrementally less than under the 2004 Housing Element, the impact would remain ***less than significant***. Likewise, construction impacts related to the generation of excessive groundborne vibration or groundborne noise from construction activities would be ***less than significant*** under Alternative A, for reasons similar to those provided under Impact NO-2 in *Section V.G. Noise* for the 2004 Housing Element.

Both Alternative A and the 2004 Housing Element include policies that direct growth to certain areas of the City and policies that promote increased density. However, Alternative A promotes increased density and housing in non-residential areas to a lesser extent than the 2004 Housing Element. Regardless, impacts related to a substantial permanent increase in ambient noise levels would be ***less than significant*** under Alternative A for reasons similar to those provided in the analysis of the 2004 Housing Element under Impact NO-3 in *Section V.G Noise*. Namely, all new residential development that includes noise generating sources (e.g., HVAC equipment) would be subject to compliance with Article 29 of the San Francisco Police Code, effectively limiting the amount of noise that could be generated at a property line by noise sources, resulting in a less than significant impact.

Similar to the 2004 Housing Element, Alternative A promotes housing construction on in-fill sites in industrial and commercial areas. As assessed under Impact NO-4 in *Section V.G. Noise*, locating housing in such areas would result in a similar potential under Alternative A for exposing residents to higher noise

levels associated with these types of non-residential uses; therefore, this impact under Alternative A would be similar to the 2004 Housing Element. However, overall noise impacts under Alternative A could be incrementally less because Alternative A does not as aggressively promote increased density resulting in a reduced number of people exposed to non-residential noise sources. Regardless, as with the 2004 Housing Element, compliance with Title 24 under Alternative A may not mitigate exterior noise on private open space and/or other site-specific conditions may warrant acoustical monitoring and analysis beyond that required for Title 24 compliance. Therefore, as with the 2004 Housing Element, Alternative A, would result in a significant impact with respect to exposing noise sensitive receptors to noise levels in excess of established standards. Compliance with Mitigation Measure M-NO-1 would reduce Alternative A's impact on noise sensitive receptors to ***less than significant with mitigation***, similar to the 2004 Housing Element.

Overall, the noise impacts under Alternative A could be incrementally less than noise impacts under the 2004 Housing Element, but these impacts would remain ***less than significant with mitigation*** for Alternative A.

2009 Housing Element Comparison

Relative to the 2009 Housing Element, Alternative A promotes increased density on a broader, citywide, scale. By both directing growth to certain areas of the City and promoting increased density standards, the 2009 Housing Element would consolidate new construction within those areas and could incrementally increase average construction duration (i.e., by increasing the number of units per building), thereby resulting in a relatively greater temporary or periodic increase in ambient noise levels compared to Alternative A. Similar to the 2009 Housing Element, Alternative A would not result in an increase in demolition, which would create demolition-related noise; policies of both Alternative A and 2009 Housing Element similarly recognize the need for the retention and maintenance of existing housing. Therefore, for reasons similar to the analysis of the 2009 Housing Element provided under Impact NO-1 *Section V.G. Noise* (e.g. compliance with the City's noise ordinance), while the temporary noise impact from new housing construction under Alternative A could be incrementally less than under the 2009 Housing Element, the impact would remain ***less than significant***.

Because the policies of both the 2009 Housing Element and Alternative A serve to limit demolition of housing, construction impacts related to the generation of excessive groundborne vibration or groundborne noise from demolition would be less than significant under Alternative A, for reasons similar to those provided under Impact NO-2 in *Section V.G. Noise*. Further, since Alternative A would not as aggressively promote housing near transit infrastructure that could expose people to excessive groundborne vibration or groundborne noise levels, this impact would be less under Alternative A than under the 2009 Housing Element (see Impact NO-2), but would remain ***less than significant***.

As discussed under Impact NO-3 regarding a substantial permanent increase in noise, new residential developments typically do not generate noise levels in excess of established standards. However, new stationary sources, such as HVAC equipment, as well as new vehicle trips could incrementally increase noise levels. Noise generated by stationary sources is regulated by Title 29 of the Police Code. The

primary difference between the 2009 Housing Element and Alternative A, with respect to a permanent increase in noise is whether new vehicular trips would substantially increase noise levels. As noted previously under *Development Assumptions by Alternative*, unlike the 2009 Housing Element, Alternative A allows growth more generally throughout the City while the 2009 Housing Element concentrates that growth in community plan areas and along transit lines. Thus, the distribution of noise from new vehicle trips would generally be more dispersed under Alternative A, resulting in an incrementally lower potential for increases in vehicular noise levels at a particular location. Therefore, Alternative A impacts related to a substantial permanent increase in ambient noise levels could be incrementally less, but would remain less than significant for reasons similar to those provided in the analysis of the 2009 Housing Element under Impact NO-3 in *Section V.G Noise*. In particular, all new residential development would be subject to compliance with Title 29 of the Police Code, resulting in a ***less than significant*** impact.

Similar to the 2009 Housing Element, Alternative A proposes housing in commercial and industrial areas as well as in the Downtown. These areas also experience high ambient noise levels. However, unlike the 2009 Housing Element, Alternative A allows housing more generally throughout the City and does not concentrate that housing near transit. As discussed in Impact NO-4 regarding exposure of persons to noise, San Francisco's transit corridors typically experience noise levels in excess of 60 Ldn. Therefore, while both the 2009 Housing Element and Alternative A would direct growth to certain areas of the City that are noisy, Alternative A does not direct that growth specifically towards transit corridors, incrementally reducing exposure of new residents to transit noise sources. Similar to the 2009 Housing Element, compliance with Title 24 under Alternative A may not mitigate exterior noise on private open space and/or other site-specific conditions may warrant acoustical monitoring and analysis beyond that required for Title 24 compliance. Therefore, as with the 2009 Housing Element, Alternative A could result in a significant impact with respect to exposing noise sensitive receptors to noise levels in excess of established standards. Compliance with Mitigation Measure M-NO-1: Interior and Exterior Noise, would reduce Alternative A's impact on noise sensitive receptors to ***less than significant with mitigation***, similar to the 2009 Housing Element.

Overall noise impacts under Alternative A would be highly dependent on individual site locations; however, it is expected that these impacts would remain ***less than significant with mitigation.***

Air Quality

2004 and 2009 Housing Element Comparison

As discussed in *Section V.H. Air Quality*, consistency of the proposed Housing Elements with regional air quality plans as assessed under Impact AQ-1 can be determined by comparing the growth factors used to generate the City's RHNA allocation with those used in the most recently adopted regional air quality plan, the Bay Area 2005 Ozone Strategy. The 2005 Ozone Strategy growth assumptions for Bay Area communities are based on ABAG's Projections. The Housing Elements are based on the Regional Housing Needs Allocation (RHNA) evaluation. As both the 2004 and 2009 Housing Elements and the 2005 Ozone Strategy utilize ABAG projections, the 2004 and 2009 Housing Elements would not result in

a significant impact on regional air quality planning efforts. For reasons similar to those detailed under Impact AQ-1, Alternative A would result in a ***less than significant*** impact on regional air quality.

Although the adoption of the 2004 and 2009 Housing Elements would not directly result in the construction of residential units, by promoting increased density, the 2004 and 2009 Housing Elements policies could indirectly contribute to an existing or projected localized air quality violation by promoting increased density in certain areas of the City, thereby consolidating new construction within those areas and potentially contributing to localized air quality impacts. The policies in Alternative A do not promote increased density to the same degree as the policies in the 2004 Housing Element, but Alternative A would generally promote density Citywide compared to the 2009 Housing Element, which includes policies encouraging density in only certain locations, or for specific types of projects. Policies which encourage additional density under the 2004 and 2009 Housing Elements could result in longer construction durations, as the construction of buildings with more units generally takes longer, and concentrate development in a smaller number of areas, which could result in an increase in total construction emissions in those areas. Therefore, localized air quality impacts from construction emissions would be incrementally reduced under Alternative A, where policies would not encourage the concentration of higher density buildings in certain areas. However, for reasons similar to those provided under Impact AQ-2 in *Section V.H. Air Quality* analyzing air quality standards and the 2004 and 2009 Housing Elements, construction impacts under Alternative A would remain ***less than significant.*** Alternative A would encourage fewer housing units near transit than either the 2004 or 2009 Housing Elements and could therefore, during operation result in incrementally greater impacts to air quality due to an increase in Vehicle Miles Traveled.

Similar to the 2004 or 2009 Housing Elements, Alternative A would not directly expose residents to TACs, for reasons similar to those provided under Impact AQ-3 in *Section V.H. Air Quality*. Namely, all future housing units would be required to undergo environmental review which would include consideration of the location of nearby industrial sites or other sources of air pollution in the design of the residential building, to orient air intake away from the sources of pollution. Demonstrated feasible mitigation measures exist for foreseeable air quality impacts associated with new residential development. Furthermore, the Potential Roadway Exposure Zone Map, codified in Article 38 of the Health Code, provides a buffer around significant TRP emission sources using $PM_{2.5}$ as a proxy for TRP exposures. Therefore, policies contained in the Air Quality Element and Transportation Element of the General Plan, as well as rules codified in Article 38 of the Health Code, would reduce the air quality impacts of the Alternative A, as with the 2004 and 2009 Housing Elements (see Impact AQ-3), with respect to directing the development housing potentially located near sources of air pollution. For reasons similar to those provided under Impact AQ-3 addressing exposure of sensitive receptors to substantial pollutants, the impact under Alternative A would be ***less than significant.*** Similar to the 2004 and 2009 Housing Elements (see Impact AQ-4 in *Section V.H. Air Quality*), Alternative A would encourage the construction of housing and would not result in the creation of objectionable odors. Overall impacts to air quality under Alternative A could be similar to those under the 2004 and 2009 Housing Elements, and these impacts would remain ***less than significant.***

Greenhouse Gases

2004 Housing Element Comparison

Both Alternative A and the 2004 Housing Element include policies that would ultimately result in reduced GHG emissions per capita by encouraging: (1) housing in proximity to job cores, neighborhood services, and/or transit; (2) increased housing density; (3) infill development; (4) preservation of existing housing stock; and (5) energy efficiency. However, Alternative A does not contain policies that would specifically encourage housing in proximity to neighborhood commercial districts, or encourage increased density by removing parking requirements and increasing the amount of lot area available for residential use. Therefore, given that Alternative A does not include these policies that would actively reduce GHG, this impact (see Impact GH-1 under *Section V.I. Greenhouse Gas Emissions*) could be incrementally greater than under the 2004 Housing Element, although still ***less than significant***, as the City's land use pattern and development standards support reduction in GHG emissions to meet statewide goals.

2009 Housing Element Comparison

Both Alternative A and the 2009 Housing Element include policies that would ultimately result in reduced per capita GHG emissions. These policies include providing housing: (1) in proximity to job cores, neighborhood services, and/or transit (although Alternative A does not as aggressively direct housing to transit); (2) by increasing housing density; (3) encouraging infill development; (4) preservation of existing housing stock or adaptive reuse of existing buildings; and (5) promoting energy efficiency. Each of these strategies could result in GHG emissions reductions. Additionally, the 2009 Housing Element includes a number of additional policies that speak to housing in proximity to job cores, neighborhood services and along transit that are not included in Alternative A. However, Alternative A contains additional policies that promote increased density more generally throughout the city, while the 2009 Housing Element includes policies that increase density in a more limited way: more specifically as a strategy to pursue during community planning processes, for housing along transit lines, and for affordable housing projects. Both Alternative A and the 2009 Housing Element include policies that promote infill development, preservation the City's existing housing stock, and energy efficiency of new development. Although both Alternative A and the 2009 Housing Element would ultimately result in reduced per capita GHG emissions, overall GHG impacts from Alternative A could be incrementally greater than under the 2009 Housing Element due to the 2009 Housing Element's additional emphasis on housing near job cores, neighborhood services and transit, which could reduce overall vehicle miles traveled, thereby reducing transportation-related GHG emissions. However, the impact (see Impact GH-1 under *Section V.I. Greenhouse Gas Emissions*) of GHG emissions under Alternative A would still be ***less than significant*** as it would not be expected to impair the state's ability to achieve its GHG target levels.

Wind and Shadow

2004 and 2009 Housing Elements Comparison

As noted above under *Development Assumptions by Alternative*, compared to the 2004 and 2009 Housing Elements, Alternative A promotes density more generally throughout the city and not in specific zoning areas or locations, and could result in lower building heights in certain areas. However, wind impacts are project-specific and all projects would continue to be subject to the Planning Department's procedures requiring modification of any new building or addition that exceeds the wind criterion, regardless of Housing Element policies. Specifically, new residential units must comply with the applicable regulations including Sections 147, 148, 243(c)(9), 249.1(b)(2), and 263.11(c) of the San Francisco Planning Code, which effectively prohibit development that would result in wind speeds that exceed hazard levels. As assessed in Impact WS-1 in *Section V.J. Wind and Shadow*, the incremental change in wind impacts from existing conditions resulting from the 2004 and 2009 Housing Elements would not be substantial because wind impacts from new housing development would be subject to applicable regulations limiting such impacts. For similar reasons as those noted under Impact WS-1 (i.e., compliance with regulations noted above), wind impacts under Alternative A would not be substantial. Therefore, this impact would be the same as the 2004 Housing Element and would have a ***less than significant*** impact with respect to the alteration of wind patterns.

Because Alternative A promotes density more generally throughout the city and not as a strategy to be pursued in specific locations, this alternative could result in lower building heights in certain areas compared to the 2004 and 2009 Housing Elements. However, as discussed under Impact WS-2 in *Section V.J. Wind and Shadow*, shadow impacts are project-specific and all applications for new construction or additions to existing buildings above 40 feet in height are reviewed by the Planning Department to determine whether such shading would affect Recreation and Park property pursuant to Section 295 of the Planning Code. Further, applications for new development that could result in new shadow are evaluated for significance under CEQA. New residential units would comply with the applicable federal, state, and local regulations including Sections 146(a), 146(c), and 295 of the San Francisco Planning Code. Potential shadow impacts under Alternative A would be subject to the same processes and requirements as those noted in Impact WS-2 for the 2004 and 2009 Housing Elements. Therefore, this impact would be the same as the 2004 and 2009 Housing Elements and Alternative A would have a ***less than significant*** impact with respect to the creation of new shadows.

Recreation

Similar to the 2004 Housing Element and 2009 Housing Element, Alternative A would not directly increase the use of recreational facilities because it would not directly result in population growth or generate new development. However, as noted under Impact RE-2 in *Section V.K. Recreation*, both the 2004 and 2009 Housing Elements would have the potential for secondary effects on recreational facilities resulting from promoting new housing in certain areas and subsequently resulting in physical deterioration of existing recreation facilities in those areas. The City currently has a ratio of 7.0 acres of open space per 1,000 San Francisco residents and the City has not established a citywide target ratio of

parkland to residents, nor has it adopted a Quimby Act ordinance. Many open space acquisitions/expansions have been identified by the Planning Department and San Francisco Recreation and Park Department, independent of Housing Element policy. Furthermore, SFRPD would continue to acquire new open space/recreation facilities pursuant to Proposition C. New housing development would be required to comply with Planning Code requirements for open space.

2004 Housing Element Comparison

Alternative A does not propose any recreational facilities. Alternative A would not directly increase the use of recreational facilities because it would not directly result in population growth. Similar to the analysis provided under Impact RE-1 and Impact RE-2 in *Section V.K. Recreation*, Alternative A could result in an increase in the use of existing neighborhood and regional parks or other recreational facilities by directing new housing development to certain areas of the City. This could potentially result in an accelerated physical deterioration of the facilities serving these areas, or could create demand that requires the need for new facilities. Unlike the 2004 Housing Element Implementation Measure 11.8.1, which calls for studying reduced private open space and potential revisions to the Planning Code, Alternative A does not propose to allow reductions to private open space requirements. Reductions in private open space may increase the potential for greater use of public recreation facilities, accelerating deterioration or creating the need for new facilities. Any such impacts under Alternative A therefore would be expected to be incrementally less than under the 2004 Housing Element. Moreover, any specific proposals for the development of park space or recreation facilities would be subject to subsequent project-level environmental review. Therefore, similar to the 2004 Housing Element, impacts related to increased use or the construction or expansion of recreational facilities would be ***less than significant***.

2009 Housing Element Comparison

Policies in the 2009 Housing Element described under Impact RE-1 in *Section V.K Recreation* support more limited consideration of reductions to required open space compared to the 2004 Housing Element. Further, the 2009 Housing Element contains policies and implementation measures that would serve to discourage reductions to private open space requirements in areas that are currently underserved with recreational facilities. Alternative A does not propose to allow reductions to private open space requirements. Reductions in private open space may increase the potential for greater use of public recreation facilities, accelerating deterioration or creating the need for new facilities. However, the 2009 Housing Element also includes policies to ensure that new residential uses are developed in concert with both "hard" and "soft" infrastructure (Implementation Measure 85), including parks and open space. Therefore, the impacts of Alternative A would be expected to be similar to the 2009 Housing Element with regard to increased use of parks resulting in deterioration or the need for new facilities, for reasons similar to those provided under Impact RE-1 and Impact RE-2 in *Section V.K Recreation*. Alternative A would not directly increase the use of recreational facilities because it would not directly result in population growth. The City has not established a citywide target ratio of parkland to residents, nor has it adopted a Quimby Act ordinance. Therefore, the City would not be required to provide or construct additional recreational facilities in response to any population growth. Specific proposals for the

development of park space or recreation facilities would be subject to subsequent project-level environmental review. Similar to the 2009 Housing Element, impacts related to increased use of parks and recreational facilities, or the construction or expansion of recreational facilities would be ***less than significant.***

Utilities and Service Systems

2004 and 2009 Housing Elements Comparison

As discussed under *Section V.L. Utilities and Service Systems*, the City requires National Pollution Discharge Elimination System (NPDES) permits, as administered by the San Francisco Bay Regional Water Quality Control Board (SFBRWQCB), according to federal regulations for both point source discharges (a municipal or industrial discharge at a specific location or pipe) and nonpoint source discharges (diffuse runoff of water from adjacent land uses) to surface waters of the United States. For point source discharges, such as sewer outfalls, each NPDES permit contains limits on allowable concentrations and mass emissions of pollutants contained in the discharge. New construction could result in impacts related to water or wastewater treatment facilities if new housing would result in the additional need for water or wastewater treatment in areas that do not have the available capacity to transport or process the additional water or wastewater. This could require the construction or expansion of water or wastewater treatment facilities.

Alternative A, like the 2004 Housing Element and 2009 Housing Element, would not directly result in the construction of residential units, and all new development would be required to comply with all provisions of the NPDES program, as enforced by the RWQCB. Therefore, neither the proposed Housing Elements nor Alternative A would result in an exceedance of wastewater treatment requirements. Additionally, the NPDES Phase I and Phase II requirements would regulate discharge from construction sites. All new development would be required to comply with all applicable wastewater discharge requirements issued by the State Water Resources Control Board (SWRCB) and RWQCB. Therefore, adoption of either Housing Element would not exceed applicable wastewater treatment requirements of the RWQCB with respect to discharges to the sewer system or stormwater system within the City. Therefore, for reasons similar to the 2004 and 2009 Housing Element as assessed under Impact UT-1, Alternative A would have a ***less than significant*** impact with respect to the exceedance of wastewater treatment requirements.

As discussed under Impact UT-2 addressing new or expanded water or wastewater facilities, policies provided under the 2004 and 2009 Housing Element would not directly result in the construction of residential units. This is also the case under Alternative A. Further, all new housing development would be required to comply with all applicable regulations (e.g., Article 4.1 of the San Francisco Public Works Code), regardless of housing element policies. As explained under Impact UT-2, policies that increase density could be achieved by the construction of multifamily housing, which uses less water than single-family homes and may result in less landscaping that requires irrigation. Therefore, increasing multifamily housing may reduce the need for new or expanded water and sewer hookups. Alternative A does not promote increased density as aggressively as the 2004 Housing Element, so it is possible that

incrementally less multifamily housing would be constructed under Alternative A. With regards to the 2009 Housing Element, both policy plans promote increased density. However, Alternative A promotes increased density more generally citywide, while the 2009 Housing Element promotes increased density in certain areas. However, while incremental differences could result under Alternative A, for reasons similar to those provided under Impact UT-2, this impact would remain ***less than significant.***

Construction associated with housing could potentially result in an increase of impervious surfaces on sites that could increase the rate of runoff, exceeding the capacity of stormwater drainage facilities, as discussed under Impact UT-3 in *Section V.L. Utilities and Service Systems*. While housing element policies would not result in the construction of new residences, the policies included in the 2004 and 2009 Housing Elements and Alternative A would vary in how they promote housing density and where that growth would be directed. Therefore, the resulting stormwater runoff impacts may differ incrementally. However, as noted under Impact UT-3, all new housing development would be required to comply with applicable regulations, including the City's Green Building Ordinance and the Green Landscaping Ordinance. Therefore, similar to impacts from the 2004 and 2009 Housing Elements, stormwater impacts under Alternative A would be ***less than significant.***

This EIR considers the degree to which construction of housing could potentially result in the need for new or expanded water supply resources or entitlements because increased density could result in inadequate water supply. As noted under Impact UT-4 in *Section V.L. Utilities and Service Systems* assessing the 2004 and 2009 Housing Elements, all new housing development would be required to comply with applicable regulations, including the City's Green Building Ordinance, Article 21 of the San Francisco Public Works Code, and the Residential Water Conservation Ordinance. These regulations would also be applicable to Alternative A. Because Alternative A promotes increased density more generally throughout the City than the 2009 Housing Element, but less so than the 2004 Housing Element (refer to discussion of Development Assumptions by Alternative), Alternative A policies would result in more multi-family housing units compared to the 2009 Housing Element, but less than the 2004 Housing Element. Multi-family housing uses less water per person than single-family housing. Thus, the total water demand under Alternative A would be less than the 2009 Housing Element, but greater than the 2004 Housing Element. However, for reasons similar to those provided under Impact UT-4, impacts related to water demand would be ***less than significant***, and would not differ substantially from the 2004 and 2009 Housing Elements.

New housing would require solid waste disposal. As further discussed under *Section V.L. Utilities and Service Systems*, according to AB 939, all cities and counties in California are required to divert 25 percent of all solid waste to recycling facilities from landfill or transfer facilities by January 1, 1995, and 50 percent by January 1, 2000. As of 2006, the most recent year for which California Integrated Waste Management Board-reviewed rates are available, the City achieved a diversion rate of 70 percent. San Francisco currently recovers 72 percent of the materials it discards. Therefore, similar to the 2004 and 2009 Housing Element, Alternative A would have ***no impact*** related to compliance with solid waste statutes and regulations. As discussed under Impact UT-5, for the 2004 and 2009 Housing Elements additional collection trucks and personnel could be required to provide solid waste services to new housing. All new development would be required to comply with the previously discussed state and local

regulations, including the City's Green Building Ordinance, Ordinance No. 27-06, and the Mandatory Recycling and Composting Ordinance (all of which contribute to the City's goal of zero waste by 2020), regardless of housing element policies. Therefore, for the same reasons provided under Impact UT-5 and because the density of new housing would not be expected to substantially or predictably alter citywide solid waste generation, impacts to solid waste generation from Alternative A would be similar to the 2004 and 2009 Housing Elements and would be ***less than significant.***

Public Services

2004 and 2009 Housing Elements Comparison

Increased density pursuant to the policy direction in Alternative A could potentially result in an increase in the number of people requiring fire protection or police services or a change in the level of service required. As discussed under *Development Assumptions by Alternative*, Alternative A promotes increased density generally on a more Citywide basis, whereas the 2004 and 2009 Housing Elements promote increased density in certain areas of the City. As discussed in Impact PS-2, none of the analyzed Housing Elements would increase the City's overall population; rather the Housing Elements provide direction for where increased residential units should be developed. As the City grows, the service areas for public services including police, fire and health care facilities would be reevaluated and resources would be reallocated to accommodate the needs in specific parts of the City, if and when conditions warrant. New development would be required to comply with current seismic and life safety requirements of the San Francisco Building and Fire Code. Therefore, for reasons discussed in Impact PS-1, PS-2 and PS-5, impacts to police, fire and health care facilities under Alternative A would be similar to the 2004 and 2009 Housing Elements and would be ***less than significant.***

As discussed under Impact PS-3, residential development is assessed a development fee on a per square foot basis for school facilities. Therefore, for the reasons discussed in Impact PS-3, Alternative A would similarly result in a ***less than significant*** impact to school facilities. Lastly, as explained in PS-4, with regards to library facilities, the SFPL does not anticipate its facilities to reach capacity within the horizon year of this EIR and responds to increased population in certain areas by increasing service hours. Therefore, for the reasons described in PS-4, Alternative A would similarly result in ***less than significant*** impacts to library services.

Biological Resources

2004 and 2009 Housing Elements Comparison

Similar to the impacts detailed in *Section V.N. Biological Resources* for the 2004 and 2009 Housing Elements, Alternative A could result in impacts to biological resources if new projects result in disturbance from construction activities, tree removal, construction on or near wetlands or sensitive habitats or riparian areas, interference with migration, take of special status-species (e.g., development/redevelopment of abandoned buildings that provide habitat for bats could impact those species), application of pesticides and herbicides, construction of tall buildings with glass walls that could

increase bird strikes and possibly interrupt a migration corridor, or conflict with provisions of an adopted habitat conservation plan. Because Alternative A promotes increased density more generally throughout the City than does the 2009 Housing Element, but less intensely than the 2004 Housing Element, it can be expected that under Alternative A impacts related to biological resources would be greater than those that could be expected under the 2009 Housing Element, but less than what could be expected under either the 2004 Housing Element or 2009 Housing Element because new development would be promoted more generally through the City rather than concentrated in certain areas. Areas where new development is directed under both the 2004 and 2009 Housing Elements are generally already developed urban lands such as commercial and industrial areas. However, as with the 2004 and 2009 Housing Elements, all housing constructed under Alternative A would be required to comply with the Open Space Element of the San Francisco General Plan, Chapter 8 of the San Francisco Environment Code, San Francisco's Green Building Ordinance, San Francisco's IPM Ordinance, San Francisco Tree Protection Ordinance, and San Francisco's Urban Forestry Ordinance, which would further minimize impacts related to biological resources. Overall, impacts to biological resources under Alternative A would be incrementally greater than under the 2004 or 2009 Housing Elements, but would remain ***less than significant*** for similar reason to those provided under Impact BI-1 in *Section V.N Biological Resources.*

Geology and Soils

The San Francisco Bay Area and surrounding areas are characterized by numerous geologically young faults. However, there are no known fault zones or designated Alquist-Priolo Earthquake Fault Zones in the City. Therefore, similar to the 2004 and 2009 Housing Elements, there would be ***no impact*** with respect to rupture of a known earthquake fault under Alternative A. Additionally, Alternative A would not result in development that uses septic tanks or alternative wastewater disposal systems. Therefore, similar to the 2004 and 2009 Housing Elements, there would be ***no impact*** with respect to septic tanks or alternative wastewater disposal systems under Alternative A.

2004 and 2009 Housing Elements Comparison

New construction could expose people and structures to geologic risks, including from rupture of a known earthquake fault, groundshaking, ground failure, or liquefaction. Additionally, housing development could be located on expansive or unstable ground, or on or near an earthquake fault, or areas prone to landslides. Policies that promote increased density could also expose people to geologically hazardous areas. In addition, increasing density could result in heavier buildings, which could increase the weight on soil beyond what it has previously experienced. Such impacts resulting from the 2004 and 2009 Housing Elements are detailed under Impact GE-1 (seismic risk) and Impact GE-3 (unstable soils) in *Section V.O. Geology and Soils*. However, as noted in that analysis, federal, state, and local regulations have been adopted to reduce impacts from seismic hazards. These regulations include the San Francisco Building Code (Building Code), Earthquake Hazards Reduction Act, Alquist-Priolo Earthquake Fault Zoning Act, and Seismic Hazards Mapping Act of 1990. Therefore, for reasons similar to those provided under Impact GE-1 and Impact GE-3 for the 2004 and 2009 Housing Elements, impacts under Alternative A would remain ***less than significant.***

Housing construction under Alternative A could result in soil erosion through the need for grading activities. As noted under the assessment of this issue from the 2004 and 2009 Housing Elements under Impact GE-2, all new development would be required to comply with regulations, including State and City Building Codes that include regulations that have been adopted to reduce impacts from grading and erosion. Thus, similar to the 2004 and 2009 Housing Elements, impacts related to soil erosion under Alternative A would be ***less than significant.***

As noted under Impact GE-4, the State of California provides minimum standards for building design through the CBC, including standards that must be met for construction on expansive soils. Similar to the impacts described for the 2004 and 2009 Housing Elements, impacts related to expansive soils under Alternative A would be ***less than significant.***

Similar to the 2004 and 2009 Housing Elements, residential development consistent with the policies in Alternative A could require grading activities that have the potential to substantially change the topography or any unique geologic or physical features on project sites. However, as noted under the assessment of the 2004 and 2009 Housing Elements under Impact GE-5, grading impacts are project-specific and all grading and building permit applications for new construction or additions to existing buildings would be reviewed by the Planning Department to determine whether grading activities might occur with the potential to substantially change the topography of a project site. Furthermore, as part of the permitting process, construction activities for new residential units would be required to comply with the Building Code regulations related to grading and excavation activities. For reasons similar to those provided under Impact GE-5, under Alternative A this impact would be ***less than significant.*** Overall, impacts to geology and soils from Alternative A would be similar to the 2004 and 2009 Housing Elements and ***less than significant.***

Hydrology and Water Quality

2004 and 2009 Housing Elements Comparison

Similar to the 2004 and 2009 Housing Elements, housing and development with densities above existing densities could occur under Alternative A. However, as discussed under Impact HY-1 in *Section V.P. Hydrology and Water Quality*, while housing element policy would not by itself result in the construction of new housing, policies that promote how and where housing is developed could result in impacts related to water quality standards, waste discharge requirements, or otherwise degrade water quality. Regardless, all new housing would be subject to compliance with existing regulations that serve to limit such impacts, including Article 4.1 of the San Francisco Public Works Code and the City's industrial waste pretreatment program to regulate the discharge of pollutants into the sewage system, and Water Quality Protection Program. Therefore, for reasons similar to those provided under Impact HY-1, this impact would remain ***less than significant*** under Alternative A.

Similar to the discussion of the 2004 and 2009 Housing Elements under Impact HY-3 and Impact HY-4, Alternative A would potentially alter existing drainage patterns through grading and construction activities. Because the City is an urban setting and development typically involves the reuse of already

developed sites, new construction frequently has no long-term effect on existing drainage patterns. However, the City also has locations with steep slopes and development in these locations can affect drainage patterns. Similar to the 2004 and 2009 Housing Elements, development under Alternative A would be required to comply with the applicable regulations, including Article 4.1 of the San Francisco Public Works Code and the City's industrial waste pretreatment program to regulate the discharge of pollutants into the sewage system, and Water Quality Protection Program. Therefore, for reasons similar to those provided for the analysis of the 2004 and 2009 Housing Elements under Impact HY-3 and Impact HY-4, impacts with respect to the rate, volume, and quality of runoff would be ***less than significant*** under Alternative A.

The construction of new housing could require dewatering or result in groundwater drawdown. Similar to the discussion of the 2004 and 2009 Housing Elements under Impact HY-2 in *Section V.P. Hydrology and Water Quality*, although short-term construction groundwater dewatering may be necessary at certain locations (e.g., for installation of building foundations or underground utilities), dewatering would be regulated by the SFPUC and would have only a minor temporary effect on the groundwater table elevation in the immediate vicinity of the activity, and would not measurably affect groundwater supplies. For the same reasons, this impact under Alternative A would be similar to the 2004 Housing Element and would remain ***less than significant***.

Similar to the discussion of the 2004 and 2009 Housing Elements under Impact HY-5, development under Alternative A could result in the construction of housing in 100-year flood hazard areas that would be subject to or could impede or redirect flood flows. However, similar to the 2004 and 2009 Housing Elements, all new development would be required to comply with federal, state, and local regulations. Development under Alternative A would not specifically direct housing to a flood area as shown in Figure V.P-1 and V.P-2 in *Section V.P. Hydrology and Water Quality*. For reasons similar to those provided under Impact HY-5 for the 2004 and 2009 Housing Elements, the impact under Alternative A would be ***less than significant.***

Additionally, new construction could result in impacts related to flooding if housing is placed near aboveground reservoirs and tanks. However, the City monitors all reservoirs in the City and is completing a project that will significantly reduce any risks of flooding from the City's reservoirs, including the Sunset Reservoir. Therefore, impacts from development under Alternative A from dam inundation would be similar to those detailed under Impact HY-6 for the 2004 and 2009 Housing Elements, and would be ***less than significant.***

New construction under Alternative A could result in impacts related to seiche, tsunami, or mudflow if new housing is placed near open water, near bodies of water, or near steep slopes in the City. This impact is detailed under Impact HY-7 in *Section V.P. Hydrology and Water Quality*. Similar to development under the 2004 and 2009 Housing Elements, all new development under Alternative A would be required to comply with the applicable federal, state, and local regulations, including the Department of Building Inspection's approval of the final plans for any specific development; therefore, similar to the 2004 and 2009 Housing Elements assessed under Impact HY-7, this impact would be ***less than significant*** under Alternative A.

Hazards/Hazardous Materials

The City is neither within an airport land use plan area, nor within two miles of a public airport or public use airport, nor within the vicinity of a private airstrip. Therefore, similar to the 2004 Housing Element or 2009 Housing Element, development under Alternative A would have ***no impact*** with respect to air safety.

2004 and 2009 Housing Elements Comparison

Similar to the 2004 and 2009 Housing Elements, Alternative A could stimulate an increase in development that is more dense than existing development and/or could indirectly result in the construction of housing, potentially resulting in the increased transport, use, or disposal of hazardous materials and impacts related to the potential for hazardous materials upset or accident conditions. However, all new development would be required to comply with federal, state, and local regulations, including the Emergency Operations Plan (EOP), Hazard Mitigation Plan, San Francisco Public Works Code, All-Hazards Strategic Plan, and San Francisco Public Health Code. Similar to the 2004 and 2009 Housing Elements assessment provided under Impact HZ-1 in *Section V.Q. Hazards and Hazardous Materials*, impacts of Alternative A with respect to the routine transport, use, or disposal of hazardous materials from development under Alternative A would be ***less than significant.***

Development under Alternative A could result in impacts related to the risk of upset and accident conditions involving hazardous materials (Impact HZ-2) because new housing construction could increase the amount of transport of hazardous materials for delivery and disposal purposes, which could in turn increase the risk of upset and accident conditions during transport. The assessment for this issue for the 2004 and 2009 Housing Elements is provided under Impact HZ-2 in *Section V.Q. Hazards and Hazardous Materials*. Under Alternative A, this impact could be incrementally less than impacts from development under the 2004 and 2009 Housing Elements due to the decreased promotion of density and proportionate reduction in site-specific risk. However, new housing development would be required to comply with all applicable federal, state, and local regulations, including the EOP, Hazard Mitigation Plan, San Francisco Public Works Code, All-Hazards Strategic Plan, and San Francisco Public Health Code. Therefore, while this impact could be incrementally reduced under Alternative A compared to the 2004 and 2009 Housing Elements, for reasons similar to those provided under Impact HZ-2 this impact would remain ***less than significant.***

New development could occur on sites that have been identified as being contaminated from the release of hazardous substances in the soil, including industrial sites, sites containing leaking underground storage tanks, and large and small-quantity generators of hazardous waste. The assessment of this issue is provided under Impact HZ-3 and Impact HZ-4 in *Section V.Q. Hazards and Hazardous Materials*. As noted for the 2004 and 2009 Housing Elements, impacts related to hazardous waste sites are typically project-specific and projects on Brownfield sites would be subject to the review and/or mitigation by the City's Department of Public Health (SFDPH) and/or the applicable regulator of hazardous waste. Specific mitigation measures would be developed in consultation with the SFDPH based on the real or perceived

contaminants that may be onsite. Therefore, this impact would be similar to the 2004 and 2009 Housing Element and would be ***less than significant*** under Alternative A.

Development under Alternative A could result in a localized increase in congestion, which could interfere with an emergency evacuation route, similar to the 2004 and 2009 Housing Elements as assessed under Impact HZ-5 in *Section V.Q. Hazards and Hazardous Materials*. In the event of a natural disaster, increased congestion could slow an evacuation effort within the City. However, the City's Emergency Response Plan (ERP), prepared in April 2008, was developed to ensure allocation of and coordination of resources in the event of an emergency in the City. The existing street grid provides ample access for emergency responders and egress for residents and workers. Thus, similar to development under the 2004 and 2009 Housing Elements and the assessment of this issue under Impact HZ-5, development under Alternative A would neither directly nor indirectly alter that situation to any substantial degree and the impact would be ***less than significant***.

As described under Impact HZ-6 in *Section V.Q. Hazards and Hazards Materials*, new development could result in impacts related to risk associated with fire if housing is constructed in near areas with potential for wildland fires or if new housing would include certain features that would put residents or workers at risk. San Francisco ensures fire safety primarily through provisions of the San Francisco Building Code and Fire Code. Existing buildings are required to meet standards contained in these codes. All housing constructed under Alternative A, including high-rise residential buildings up to forty stories, would be required to meet standards for emergency access, sprinkler and other water systems, and other requirements specified in the San Francisco Fire Code. Standards pertaining to equipment access would also be met. Plan review for compliance with San Francisco Fire Code requirements, to be completed by Department of Building Inspection (DBI) and the San Francisco Fire Department (SFFD), would minimize fire-related emergency dispatches, reducing the demand for fire protection services in the City. For reasons similar to the assessment of the 2004 and 2009 Housing Elements under Impact HZ-6, this impact would be ***less than significant***.

Overall, impacts to hazards and hazardous materials from development under Alternative A would be ***less than significant***.

Mineral/Energy Resources

The City is not a designated area of significant mineral deposits and no area within the City is designated as a locally-important mineral resource recovery site. Therefore, similar to the 2004 and 2009 Housing Elements there would be ***no impact*** related to the loss of availability of a known mineral resource or the loss of availability of a locally important mineral resource recovery site.

2004 and 2009 Housing Elements Comparison

New development would be required to comply with the federal, state, and local regulations discussed under *Section V.R. Mineral and Energy Resources*. Therefore, similar to the 2004 and 2009 Housing Elements, projects constructed under Alternative A would be required to comply with the Environmental

Protection Element of the San Francisco General Plan, San Francisco's Green Building Ordinance, San Francisco Residential Energy Conservation Ordinance, and San Francisco Sustainability Plan. New development would also have the opportunity to participate in voluntary programs, such as GoSolarSF and San Francisco's Green Priority Permitting Program. Therefore, similar to the 2004 and 2009 Housing Elements, as assessed under Impact ME-1 in *Section V.R. Mineral and Energy Resources*, Alternative A would have a ***less than significant*** impact with respect to the use of large amounts of fuel, water, or energy.

Agricultural Resources

The entire City is identified as Urban and Built-Up Land by the Department of Conservation and does not contain any important farmland. The City does not participate in the Williamson Act Program and no land within City boundaries is under Williamson Act contract. Therefore, similar to the discussion of the 2004 and 2009 Housing Elements in *Section V.S. Agricultural and Forest Resources*, there would be ***no impact*** under Alternative A related to the direct conversion of Farmland to non-agricultural use, conflict with a Williamson Act contract, or the conversion of Farmland to non-agricultural use due to other changes in the existing environment.

Under Alternative A, there would be no changes to zoning or height and bulk districts. P Districts, which include most of the City's urban forest lands, would not be at risk for conversion to residential zoning. However, development under Alternative A could result in impacts if trees in other districts were removed, damaged, or otherwise physically affected by a new project. However, any project proposed consistent with Alternative A would be required to comply with the San Francisco Tree Protection Ordinance and the required replacement ratios to minimize impacts related to the urban forest. Therefore, similar to the 2004 and 2009 Housing Elements, there would be ***no impact*** related to forest land and timberland zoning or the loss or conversion of forest land.

2004 Housing Element

The San Francisco Recreation and Park Department (SFRPD) supports and manages a program of 40 community gardens on City-owned property. Community gardens are allowed on SFRPD lands zoned Public Use (P) District and allowed in all Residential (RH, RC, RM) Districts. New housing could include projects built to the maximum allowable height and bulk capacity, which could block sun on plots currently used for urban farming or community gardens or otherwise physically affect community gardens. New housing could also result in development of lots currently used for community gardens. Under Alternative A, there would be no changes to zoning or height and bulk districts and therefore, no new conflicts with existing zoning for agricultural uses. Therefore, for reasons similar to those provided under Impact AG-1 in *Section V.S. Agricultural and Forest Resources*, impacts under Alternative A would be similar to the 2004 Housing Element and ***less than significant.***

2009 Housing Element Comparison

Community gardens are allowed on SFRPD lands zoned P District and allowed in all R Districts. New housing could include projects built to the maximum allowable height and bulk capacity, which could block sun on plots currently used for urban farming or community gardens or otherwise physically affect community gardens. New housing could also result in development of lots currently used for community gardens. Under Alternative A, there would be no changes to zoning or height and bulk districts and therefore, no new conflicts with existing zoning for agricultural uses. Therefore, for reasons similar to those provided under Impact AG-1 in *Section V.S. Agricultural and Forest Resources*, impacts under Alternative A would be similar to the 2009 Housing Element and ***less than significant.***

Attainment of Project Objectives

As stated in above on page VII-3, the objectives of the proposed Housing Elements are to provide a vision for the City's housing and growth management through 2014; maintain the existing housing stock to serve housing needs; ensure capacity for the development of new housing to meet the RHNA at all income levels; encourage housing development where supported by existing or planned infrastructure, while maintaining existing neighborhood character; encourage, develop and maintain programs and policies to meet projected affordable housing needs; develop a vision for San Francisco that supports sustainable local, regional and state housing and environmental goals; and adopt a housing element that substantially complies with California housing element law as determined by the California Department of Housing and Community Development.

Under Alternative A: the No Project/Continuation of 1990 Residence Element Alternative, the 1990 Residence Element policies would remain in effect and neither the proposed 2004 Housing Element nor the 2009 Housing Element policies would be implemented. Housing development in the City would continue as encouraged under the 1990 Residence Element. However, this alternative would use the most recently identified RHNA allocation (which would need to be met) and an updated Data and Needs Analysis.

Alternative A would attain the following project objectives to the same degree as the 2004 Housing Element and the 2009 Housing Element:

- **Provide a vision for the City's housing and growth management through 2014.** Alternative A provides such a vision for the City's future residential development.

- **Maintain the existing housing stock to serve housing needs.** Alternative A contains policies that emphasize retention of the existing housing stock.

- **Ensure capacity for the development of new housing to meet the RHNA at all income levels.** Part I of the Housing Element would not differ from either the 2004 or the 2009 Housing Element under Alternative A. As Part I demonstrates, the City can accommodate the RHNA quantities within the existing zoning designations, so adequate capacity for new housing exists.

Alternative A would be less effective at attaining the following project objectives than either the 2004 or the 2009 Housing Element:

- **Encourage housing development where supported by existing or planned infrastructure, while maintaining existing neighborhood character.** As described in this analysis, Alternative A would less actively encourage residential development in areas served by transit than either the 2004 or 2009 Housing Element, whereas neither the 2004 or 2009 Housing Element would demonstrably alter neighborhood character. In particular, the 2009 Housing Element specifically emphasizes development in a manner that does not present conflicts with existing neighborhood character. Therefore, since Alternative A would be less effective at directing development to areas supported by existing or planned infrastructure, Alternative A would be less effective overall at meeting this objective compared to the 2004 or 2009 Housing Element.

- **Encourage, develop and maintain programs and policies to meet projected affordable housing needs.** Increased density and reduced parking requirements are both strategies for improving the affordability of new housing by reducing land and development costs per unit. While the policies and implementation measures in Alternative A would not preclude the use of such strategies, Alternative A does not promote the use of them to the same degree as the 2004 or 2009 Housing Element, and also does not contain alternative strategies that would be equally effective at achieving affordability.

- **Develop a vision for San Francisco that supports sustainable local, regional and state housing and environmental goals.** On a state and regional level, current planning efforts support increased residential development near transportation infrastructure (e.g. SB 375) and strategies to encourage more sustainable use of natural resources. Specifically, by not promoting increased density in transit corridors or reduced parking requirements, Alternative A does not encourage a development pattern that maximizes sustainability on a local or regional level.

- **Adopt a housing element that substantially complies with California housing element law as determined by the California Department of Housing and Community Development**. Given that Alternative A was successfully certified by HCD in the past, and that Part I of the Housing Element has been updated and demonstrates that the City has adequate capacity to accommodate the RHNA, it is assumed that Alternative A would meet this objective. However, since the Housing Element would be certified at the discretion of HCD, it is not possible to conclude with certainty that Alternative A meets this EIR objective.

Alternative B: 2004 Housing Element–Adjudicated

Alternative B includes the objectives, policies and implementation measures of the 2004 Housing Element minus those policies that were stricken by the court in the appeal of the 2004 Housing Element. Similar to Alternative A, this alternative would need to meet the most recently identified RHNA allocation and include an updated Data and Needs Analysis.

The following policies and implementation actions were struck by the San Francisco Superior Court based on the Court of Appeal's decision regarding the 2004 Housing Element, and are therefore NOT included in Alternative B:

- Policy 1.7: Encourage and support the construction of quality, new family housing.
- Implementation 1.7:
    - In response to the increasing number of families in San Francisco, the Planning Department will develop zoning amendments to require a minimum percentage of larger family units, ranging from two to four bedrooms, in new major residential projects. The Planning Department will also propose eliminating density requirements within permitted building envelopes in downtown areas and areas subject to a Better Neighborhoods type planning process to maximize family units constructed.
    - The Mayor's Office of Housing and the San Francisco Redevelopment Agency will continue to administer programs for development of affordable family rental housing. Priority will continue to be given to projects that include affordable family units for the homeless and those at-risk of homelessness, and include supportive services for residents.
    - The Planning Department will study the feasibility of "flexible" development projects to accommodate family growth, shrinkage, expansion, and extension. Loft sleeping areas, family rooms and master bedrooms could be designed to ease future conversion to efficiency apartments for family members, or as an income unit.
- Policy 11.1: Use new housing development as a means to enhance neighborhood vitality and diversity.
- Implementation 11.1:
    - The new Land Use Element will identify in-fill sites appropriate for mixed-use residential projects. Appropriate neighborhood serving retail, public facilities and supportive amenities should be encouraged.
    - The City will continue to implement its policy that the design of all housing sites and related amenities make a positive contribution to surrounding public space and to overall neighborhood vitality.

- The Planning Department will encourage historic preservation and adaptive reuse of older buildings to enhance neighborhood vibrancy.

- Policy 11.5: Promote the construction of well-designed housing that enhances existing neighborhood character.

- Implementation 11.5:

  - The Planning Department will continue to study the construction methods and design components of well-designed housing that enhances the existing urban fabric of San Francisco.

  - The Planning Department will continue to use the Residential Design Guidelines when reviewing projects.

  - Each project will be considered on its own merit and on its ability to make a positive contribution to the immediate neighborhood and the City.

- Policy 11.6: Employ flexible land use controls in residential areas that can regulate inappropriately sized development in new neighborhoods, in downtown areas and in other areas through a Better Neighborhoods type planning process while maximizing the opportunity for housing near transit.

- Implementation 11.6:

  - The City will continue to promote increased residential densities in areas well served by transit and neighborhood compatible development with the support and input from local neighborhoods.

- Policy 11.7: Where there is neighborhood support, reduce or remove minimum parking requirements for housing, increasing the amount of lot area available for housing units.

- Implementation 11.7:

  - The Planning Department will work to reduce parking in older neighborhoods and in other areas through a Better Neighborhoods type planning process with the support and input from local neighborhoods.

- Policy 11.8: Strongly encourage housing project sponsors to take full advantage of allowable building densities in their housing developments while remaining consistent with neighborhood character.

- Implementation 11.8:

- The Planning Department, with the support and input from local neighborhoods, study the impacts of reduced parking and private open space provisions and will consider revising the Planning Code accordingly.

- The Planning Department will work with housing advocates to educate residents on the benefits of traditional urban neighborhood supporting housing densities.

- Policy 11.9: Set allowable densities and parking standards in residential areas at levels that promote the City's overall housing objectives while respecting neighborhood scale and character.

- Implementation 11.9:

  - The City, through a Better Neighborhoods type planning process, will continue to work to improve and enhance housing with the goal of more housing and vital, attractive transit served neighborhoods.

  - The Planning Department will continue to employ Residential Design Guidelines and implement the General Plan to ensure new projects are compatible with established neighborhoods.

  - The new Land Use Element will, within the framework of a comprehensive citywide action plan (CAP), identify areas where higher densities are appropriate.

  - The updated Urban Design Element will reconcile the City's established and well formulated urban design principles with the City's housing objectives.

The following implementation actions were amended by the San Francisco Superior Court based on the decision by the Court of Appeal in its decision regarding the 2004 Housing Element:

- Implementation 1.6:

  - The Planning Department will review the following incentives for commercial project developments in the Downtown C-3 District: floor-to-area ratio (FAR) exemption for housing; ~~no residential parking requirement; and no density requirements for residential projects.~~ Housing in excess of the base FAR in the Downtown General (C-3-G) and Downtown Support (C-3-S) Districts has also been proposed by the Board of Supervisors.

  - ~~The Planning Department and the Redevelopment Agency will propose increasing height limits, eliminating density requirements and modifying off-street parking requirements in the Transbay/Rincon Hill redevelopment survey areas. The Mid-Market redevelopment survey area will be re-zoned to include mixed use residential areas and reduced residential parking requirements.~~

- The Planning Department will continue to implement the Van Ness Avenue Plan which requires residential units over commercial uses.

- The Planning Department will update the Land Use Element to define areas for mixed-use development focused along transit corridors that are determined to be served by sufficient and reliable transit.

The themes of Alternative B – the 2004 Housing Element Adjudicated – focus on increasing housing supply through higher density, encouraging family-sized housing, and reducing parking requirements to make more space available for housing units. Alternative B also focuses on infill and mixed-use development, affordable housing, and utilization of City-owned vacant or underused sites. In addition, the 2004 Housing Element and Alternative B encourage new housing in Downtown and increased housing in neighborhood commercial districts and mixed-use districts near Downtown. However, the primary difference between the 2004 Housing Element and Alternative B is the 2004 Housing Element's policies that more aggressively encourage increased density (such as Policies 1.1, 11.6, 11.9 and Implementation Measures 1.3.1, 1.6.2, and 1.7.1 shown on Table VII-1) have been removed. Thus, Alternative B would not increase density to the same degree as the 2004 Housing Element. Similarly, the 2009 Housing Element includes a number of implementation measures to promote increased density that are not included in Alternative B. This would result in smaller/less dense projects overall.

Land Use

Similar to the 2004 Housing Element and 2009 Housing Element, Alternative B would not include any extensions of roadways or other development features through a currently developed area that could physically divide an established community. Areas for future housing development would occur primarily as infill on individual parcels as most future housing development would take place in established neighborhoods. With respect to division of a community, Alternative B would be similar to the 2004 Housing Element and 2009 Housing Element by encouraging additional residential growth in established areas, and subject to an established land use plan, and hence there would be ***no impact.***

2004 Housing Element Comparison

Similar to the 2004 Housing Element, development under Alternative B would be subject to existing Area Plans and Redevelopment Plans and would serve to complement (and not conflict with) the policies and land uses in an Area Plan or Redevelopment Plan. Additionally, the policies in Alternative B would not conflict with any regional land use policies, the Regional Transportation Plan, or prevailing local plans, including BCDC policies, and the San Francisco planning policies (General Plan, Countywide Transportation Plan, MTA Strategic Plan, Bicycle Plan, and Urban Forest Plan) for reasons substantially similar to those discussed in this EIR under Impact LU-1 in *Section V.B, Land Use and Land Use Planning.*

As noted in the prior discussion of *Development Assumptions by Alternative*, similar to the 2004 Housing Element, Alternative B would encourage new housing in Downtown and in underutilized commercial and

industrial areas. Additionally, the 2004 Housing Element and Alternative B would encourage increased housing in neighborhood commercial districts and mixed-use districts near Downtown. While Alternative B would not increase density to the same extent as the 2004 Housing Element due to the elimination of certain policies as shown in Table VII-1, the resulting changes would be more likely to affect the density of housing (i.e. the number of units) within new buildings more than the number of buildings constructed. As such, the potential for land use conflicts from new housing that affect neighborhood character would not substantially differ under Alternative B compared to the 2004 Housing Element. This impact would remain ***less than significant*** under Alternative B for reasons similar to those provided for the 2004 Housing Element under Impact LU-2 in *Section V.B. Land Use and Planning*. Similar to the 2004 Housing Element, overall land use impacts would be ***less than significant.***

2009 Housing Element

Similar to new housing development under the 2009 Housing Element, development under Alternative B would be subject to the controls in existing Area Plans and Redevelopment Plans and would not substantially conflict with the policies and land uses in current Area Plans or Redevelopment Plans. Additionally, Alternative B would not conflict with any regional land use policies, the Regional Transportation Plan, or prevailing local plans, including BCDC policies and the San Francisco planning policies (General Plan, Countywide Transportation Plan, MTA Strategic Plan, Bicycle Plan, and Urban Forest Plan) for reasons substantially similar to those discussed under Impact LU-1 in *Section V.B, Land Use and Land Use Planning*.

As noted in the prior discussion of *Development Assumptions by Alternative*, similar to the 2009 Housing Element, Alternative B would encourage housing integrated into all new commercial or institutional projects, near major transit lines, and through community planning efforts (see Table VII-1; refer also to discussion of 2009 Housing Element under Impact LU-2 in *Section V.B, Land Use and Land Use Planning*). However, Alternative B would not increase density to the same extent as the 2009 Housing Element, which includes more density-promoting policies than Alternative B (refer to discussion of *Development Assumptions by Alternative*). Therefore, impacts related to land use conflicts and neighborhood character would be incrementally less under Alternative B than the 2009 Housing Element. However, for reasons similar to those provided in the assessment of the 2009 Housing Element under Impact LU-2, these impacts would be ***less than significant.***

Aesthetics

2004 and 2009 Housing Elements Comparison

As noted in the prior discussion of *Development Assumptions by Alternative*, Alternative B promotes density to a lesser degree than under the 2004 or 2009 Housing Element. As a result, incrementally smaller residential buildings might be constructed under Alternative A, resulting in incrementally fewer potential impacts to scenic vistas than the 2004 or 2009 Housing Elements. Alternative B might also reduce the potential for new development on vacant or undeveloped parcels or redevelopment of underutilized parcels to affect existing natural features (and scenic resources) as compared to the 2004

and 2009 Housing Elements. As noted in the prior discussion of *Development Assumptions by Alternative*, similar to the 2004 and 2009 Housing Elements, Alternative B includes policies to preserve landmark buildings and includes guidelines for development that are intended to preserve neighborhood character and that would protect existing visual character. For reasons similar to those provided under Impacts AE-1, AE-2, and AE-3 in *Section V.C. Aesthetics*, which address impacts on scenic vistas, visual resources, and visual character under the 2004 and 2009 Housing Elements, impacts under Alternative B would be ***less than significant***. Similarly, for reasons detailed in Impact AE-4, impacts to light and glare would be ***less than significant.***

Population and Housing

Similar to the 2004 Housing Element and 2009 Housing Element, San Francisco's population and development to meet that population would occur regardless of the housing development policies included in Alternative B (see discussion under Impact PH-1 in *Section V.D. Population and Housing*). Additionally, similar to the 2004 Housing Element and 2009 Housing Element, housing policies under Alternative B would not trigger the need for roadway expansions or result in the extension of infrastructure into previously unserved areas, which could induce additional population growth, for the same reasons discussed under Impact PH-1. Also similar to the 2004 Housing Element and 2009 Housing Element, the policies under Alternative B would not cause a substantial change in the workers-to-households ratio as compared to the 2004 and 2009 Housing Element policies. That is, between 2005 and 2020 no impact to the jobs/housing balance would occur under Alternative B. For reasons similar to those provided under the assessment of the 2004 and 2009 Housing Elements under Impact PH-1, impacts related to inducing a substantial amount of population growth would remain ***less than significant*** under Alternative B.

2004 Housing Element Comparison

As discussed above under *Development Assumptions by Alternative,* Alternative B promotes density to a lesser extent than the 2004 Housing Element. Therefore, impacts due to increased density would be less. However, similar to the 2004 Housing Element, residential development in the City would occur regardless of Alternative B. The overlapping policies of the 2004 Housing Element and Alternative B encourage development of housing on public lands and in secondary units, and also promote housing opportunities that would avoid displacement of existing or affordable housing. As noted previously, similar to the 2004 Housing Element, Alternative B encourages new housing in Downtown and in underutilized commercial and industrial areas (see Table VII-1). The 2004 Housing Element also encourages increased housing in neighborhood commercial districts and mixed use districts near Downtown. Impacts created by increases in population and housing would be the same as under the 2004 Housing Element. More specifically, impacts under Alternative B related to the displacement of existing housing or creating demand for housing (Impact PH-2), or substantial impacts related to displacement of people (Impact PH-3), would be ***less than significant***, for the same reason stated in the analysis of the 2004 Housing Element *Section V.D. Population and Housing*. As noted in that section, similar to the 2004 Housing Element, compliance with existing Planning and Building Code requirements would minimize the potential to displace housing or people. Further, because the Housing Element does not

cause housing growth, no additional demand for housing would result from implementation of Alternative B.

2009 Housing Element Comparison

As discussed previously under *Development Assumptions by Alternative*, housing density under Alternative B would be less than under the 2009 Housing Element. The 2009 Housing Element encourages housing in all new commercial or institutional projects, near major transit lines, and through community planning efforts. Impacts with regard to population and housing include the displacement of existing housing or creating demand for housing (Impact PH-2 in *Section V.D. Population and Housing*), or substantial impacts related to displacement of people (Impact PH-3). Alternative B would promote housing, but would not increase the density of housing supply to the extent that would occur under the 2009 Housing Element, and therefore could result in incrementally less dense developments. Regardless, impacts under Alternative B would be similar to, or less than those of the 2009 Housing Element, for the reasons provided under Impact PH-2 and PH-3, namely all new development will continue to comply with existing Planning and Building Code requirements that minimize the potential to displace housing or people, and development consistent with Alternative B would not induce additional demand for housing. Impacts under Alternative B would be ***less than significant***.

Cultural Resources

2004 and 2009 Housing Elements Comparison

Similar to the 2004 and 2009 Housing Elements, Alternative B could result in a substantial adverse change to a historical resource by promoting development that included inappropriate alterations and/or additions, inappropriate new construction, or demolition by neglect. That is, Alternative B could result in residential development that includes inappropriate alterations or additions to existing housing, or new construction that detracts from the historical or cultural significance of an existing building or area. In addition to impacts on individual properties, cumulative impacts could arise in certain areas over the course of time, thereby diminishing the historic significance of the area.

However, similar to the 2004 and 2009 Housing Elements, under Alternative B new construction, alterations, and demolitions would be required to undergo environmental review to determine if there are any impacts to historic resources, including individual resources and historic districts. In addition, the City has well-established review criteria and procedures to evaluate impacts to historic resources at the project level. For this and other similar reasons detailed under Impact CP-1 in *Section V.E. Cultural and Paleontological Resources*, adoption of Alternative B would not result in any new residential development or exempt any future housing projects from review for impacts to historic resources. However, due to the differing policies contained in the 2004 and 2009 Housing Elements, potential impacts (specifically from demolition of non-landmark historic buildings and resources) could be incrementally greater under Alternative B than under the 2004 or 2009 Housing Element, which would be a potentially significant impact. Specifically, Implementation Measure 11.1.3 from the 2004 Housing Element which promotes adaptive reuse and historic preservation, is not included in Alternative B.

Impacts to landmark buildings would be similar under Alternative B as under the 2004 Housing Element because Alternative B would retain some 2004 Housing Element policies encouraging the preservation and adaptive reuse of landmark buildings, such as encouraging consistency with historic districts and the strengthening of an area's sense of history. Overall, Alternative B could result in smaller/less dense residential projects and includes policies from the 2004 Housing Element that support historic preservation; therefore, for the same reason provided under Impact CP-1 in *Section V.E. Cultural and Paleontological Resources*, similar to the 2004 and 2009 Housing Elements these impacts under Alternative B would remain ***less than significant.***

For reasons similar to those provided under Impact CP-2 and CP-3 in *Section V.E. Cultural and Paleontological Resources* assessing the 2004 and 2009 Housing Elements, Alternative B could result in a substantial adverse change to an archeological or paleontological resource. Such impacts could result from increasing the potential for residential development with deep foundations or soil improvements (which are associated with taller buildings), soils disturbance, or directing housing to areas with high potential for archeological deposits near the existing surface. As discussed under Impact CP-2 for both the 2004 and 2009 Housing Elements, the City's established review procedures ensure that any potential to affect archeological resources at the project-level can be addressed and reduced to a less-than significant level. Such procedures would also be applicable under Alternative B. Similarly, potential impacts of the 2004 and 2009 Housing Elements on paleontological resources discussed under Impact CP-3 would be subject to existing regulations, including the National Historic Preservation Act, and would also apply under Alternative B. Therefore, similar to the 2004 and 2009 Housing Elements, potential impacts of adopting Alternative B on archeological and paleontological resources would be ***less than significant.*** Similar to development under the 2004 and 2009 Housing Elements, development under Alternative B would have the potential to disturb human remains. As discussed under Impact CP-4 in *Section V.E. Cultural and Paleontological Resources*, existing regulations, including Sections 7050.5, 7051, and 7054 of the California Health and Safety Code and Public Resource Code Section 5097.8 would address such impacts. Such regulations would also apply to development Alternative B. Thus, similar to the 2004 and 2009 Housing Elements, under Alternative B this impact would be ***less than significant.***

Transportation and Circulation

2004 and 2009 Housing Elements Comparison

The following Table VII-2 provides a comparison of policies under Alternative B that relate to transportation and circulation impacts in relation to existing conditions (i.e., policies under the 1990 Residence Element). Text below in strikeout represents policies from the 2004 Housing Element that are eliminated under Alternative B, consistent with the trial court ruling.

Table VII-2
Comparison of 1990 Residence Element and Alternative B Objectives, Policies, and Implementation Measures That Could Affect the City Transportation Network

Impact	Alternative B	Corresponding 1990 Residence Element
Policies Related to Directing Growth to Specific City Areas	Policy 1.1: Encourage higher residential density in areas adjacent to Downtown, in underutilized commercial and industrial areas proposed for conversion to housing and in neighborhood commercial districts where higher density will not have harmful effects, especially if the higher density provides a significant number of units that are affordable to lower income households. ~~Set allowable densities in established residential areas at levels which will promote compatibility with prevailing neighborhood scale and character where there is neighborhood support.~~	Policy 2.1: Set allowable densities in established residential areas at levels which will promote compatibility with prevailing neighborhood character.
		Policy 2.2: Encourage higher residential density in areas adjacent to Downtown, in underutilized commercial and industrial areas proposed for conversion to housing and in neighborhood commercial districts where higher density will not have harmful effects, especially if the higher density provides a significant number of units that are affordable to lower income households.
	~~Policy 1.2: Encourage housing development, particularly affordable housing, in neighborhood commercial areas without displacing existing jobs, particularly blue collar jobs or discouraging new employment opportunities.~~	No corresponding Policy
	~~Implementation Measure 1.1.1: A Citywide action plan (CAP) should provide a comprehensive framework for the allocation of higher density, mixed use residential development in transit rich areas with stable urban amenities in place. In these areas, specific CAP strategies should include: higher densities and reduced parking requirements in Downtown areas or through a Better Neighborhoods type planning process; pedestrian oriented improvements to enhance the attractiveness and use of transit.~~	No corresponding Implementation Measure
	~~Implementation Measure 1.2.1: The Planning Department will develop proposals in neighborhood commercial districts (NCDs) well served by transit to strengthen their functions as a traditional "town center" for the surrounding residential districts.~~	No corresponding Implementation Measure
	Policy 1.3: Identify opportunities for housing and mixed-use districts near Downtown and former industrial portions of the City.	Policy 1.2 Facilitate the conversion of underused industrial and commercial areas to residential use, giving preference to permanently affordable housing uses.

Table VII-2
Comparison of 1990 Residence Element and Alternative B Objectives, Policies, and Implementation Measures That Could Affect the City Transportation Network

Impact	Alternative B	Corresponding 1990 Residence Element
	Implementation Measure 1.3.1: ~~Downtown areas and areas subject to a Better Neighborhoods type planning process will be expected to absorb major office and residential developments over the next decade. Planning and zoning code changes should include floor to area ratio exemptions~~. These development bonuses would be conferred only in cases where in return the development will provide major public benefits to the community.	No corresponding Implementation Measure
	Implementation Measure 1.3.2: The Planning Department will introduce zoning changes in the traditionally industrial eastern parts of the City. The areas under study are: Mission, South of Market, Showplace Square/Potrero Hill, Bayview Hunter's Point, and Visitacion Valley. Housing, especially affordable housing, will be encouraged in former industrial areas where residential neighborhoods are established and urban amenities are in place or feasible.	No corresponding Implementation Measure, although Map 1 of the 1990 Residence Element depicts Housing Opportunity Areas, which generally cover the same areas mentioned in Alternative B Implementation Measure 1.3.2.
	Implementation Measure 1.6.1: The Planning Department will review the following incentives for commercial project developments in the Downtown C-3 District: Floor-to-area ratio (FAR) exemption for housing; ~~no residential parking requirement, and no density requirements for residential projects.~~ Housing in excess of the base FAR in the Downtown General (C-3-G) and Downtown Support (C-3-S) Districts has also been proposed by the Board of Supervisors.	No corresponding Implementation Measure
	Implementation Measure 1.6.2: ~~The Planning Department and the Redevelopment Agency will propose increasing height limits, eliminating density requirements and modifying off-street parking requirements in the Transbay/Rincon Hill Redevelopment survey areas. The Mid-Market redevelopment survey area will be re-zoned to include mixed-use residential areas and reduced residential parking requirements.~~	No corresponding Implementation Measure

Table VII-2
Comparison of 1990 Residence Element and Alternative B Objectives, Policies, and Implementation Measures That Could Affect the City Transportation Network

Impact	Alternative B	Corresponding 1990 Residence Element
	Implementation Measure 1.6.4: The planning Department will update the Land Use Element to define areas for mixed-used development focused along transit corridors that are determined to be served by sufficient and reliable transit.	No corresponding Implementation Measure
	Policy 1.8: Allow new secondary units in areas where their effects can be dealt with and there is neighborhood support, especially if that housing is made permanently affordable to lower-income households.	Policy 1.5: Allow new secondary units in areas where their effects can be dealt with and there is neighborhood support, especially if that housing is made permanently affordable to lower-income households.
	Implementation Measure 1.8.1: The Board of Supervisors has introduced Planning Code amendments to allow secondary units in new buildings that are in close proximity to neighborhood commercial districts and public transit.	No corresponding Implementation Measure
	Policy 1.9: Require new commercial developments and higher educational institutions to meet the housing demand they generate, particularly the need for affordable housing for lower income workers.	Policy 1.7: Obtain assistance from office developments and higher educational institutions in meeting the housing demand they generate, particularly the need for affordable housing for lower income workers and students.
	Implementation Measure 1.9.2: Institutions are required to have an Institutional Master Plan that conforms to the General Plan. The Planning Department will evaluate higher educational institution's student housing programs through the required Institutional Master Plan.	No corresponding Implementation Measure
	Implementation Measure 2.4.2: As part of the Planning Department's current citywide action plan, planning efforts in the eastern neighborhoods of the City, where housing exists in commercial and industrially zoned districts, should address housing retention as new policies and zoning are established. Mixed use should be encouraged where appropriate.	No corresponding Implementation Measure

Table VII-2
Comparison of 1990 Residence Element and Alternative B Objectives, Policies, and Implementation Measures That Could Affect the City Transportation Network

Impact	Alternative B	Corresponding 1990 Residence Element
	Implementation Measure 8.6.1: The City will continue to encourage and support the development of specialized housing types that meet the particular needs of various user groups. This housing will be especially encouraged in transit rich areas of the City, maximizing mobility and accessibility to services.	No corresponding Implementation Measure
	Implementation Measure 11.1.1: ~~The new Land Use Element will identify in-fill sites appropriate for mixed use residential projects. Appropriate neighborhood serving retail, public facilities and supportive amenities should be encouraged.~~	No corresponding Implementation Measure
	Implementation Measure 11.4.2: The City will work to require institutions to provide housing for workers and students.	No corresponding Implementation Measure
	Policy 11.6: ~~Employ flexible land use controls in residential areas that can regulate inappropriately sized development in new neighborhoods, in Downtown areas and in other areas through a Better Neighborhoods type planning process while maximizing the opportunity for housing near transit.~~	Policy 12.5: Relate land use controls to the appropriate scale for new and existing residential areas.
	Implementation Measure 11.6.1: ~~The City will continue to promote increased residential densities in areas well served by transit and neighborhood compatible development with the support and input from local neighborhoods.~~	No corresponding Implementation Measure
	Implementation Measure 11.9.1: ~~The City, through a Better Neighborhoods type planning process, will continue to work to improve and enhance housing with the goal of more housing and vital, attractive transit served neighborhoods.~~	No corresponding Implementation Measure
	Implementation Measure 11.9.3: ~~The new Land Use Element will, within the framework of a comprehensive citywide action plan (CAP), identify areas where higher densities are appropriate.~~	No corresponding Implementation Measure
Parking-related policies	Policy 4.4: Consider granting density bonuses and parking requirement exemptions for the construction of affordable housing or senior housing.	No corresponding Policy

Table VII-2
Comparison of 1990 Residence Element and Alternative B Objectives, Policies, and Implementation Measures That Could Affect the City Transportation Network

Impact	Alternative B	Corresponding 1990 Residence Element
	Policy 11.7: ~~Where there is neighborhood support, reduce or remove minimum parking requirements for housing, increasing the amount of lot area available for housing units.~~	No corresponding Policy
	Implementation Measure 1.1.1: ~~A citywide action plan (CAP) should provide a comprehensive framework for the allocation of higher density, mixed-user residential development in transit rich areas with stable urban amenities in place. In these areas, specific CAP strategies should include: higher densities and reduced parking requirements in Downtown areas or through a Better Neighborhoods type planning process; pedestrian oriented improvements to enhance the attractiveness and use of transit.~~	No corresponding Implementation Measure
	Implementation Measure 1.6.1: The Planning Department will review the following incentives for commercial project developments in the Downtown C-3 District; Floor-to-area ratio (FAR) exemption for housing; ~~no residential parking requirements, and no density requirement for residential projects~~. Housing in excess of the base FAR in the Downtown General (C-3-G) and Downtown Support (C-3-S) Districts has also been proposed by the Board of Supervisors.	No corresponding Implementation Measure
	Implementation Measure 1.6.2: ~~The Planning Department and the Redevelopment Agency will propose modifying off-street parking requirements in the Transbay/Rincon Hill Redevelopment survey areas. The Mid-Market redevelopment survey areas will be re-zoned to include mixed-use residential areas and reduced residential parking requirements.~~	No corresponding Implementation Measure
	Implementation Measure 1.8.3: The Planning Department will study the impacts of relaxing parking requirements for secondary units located in all neighborhoods.	No corresponding Implementation Measure

Table VII-2
Comparison of 1990 Residence Element and Alternative B Objectives, Policies, and Implementation Measures That Could Affect the City Transportation Network

Impact	Alternative B	Corresponding 1990 Residence Element
	Implementation Measure 4.4.1: Until the Planning Department establishes uniform requirements for affordable and senior housing development, affordable and senior housing projects will continue to be granted reduced parking requirements on a case-by-case basis.	No corresponding Implementation Measure
	Implementation Measure 4.4.2: The Planning Department will investigate appropriate parking requirements for all affordable or senior housing projects.	No corresponding Implementation Measure
	Implementation Measure 11.7.1: ~~The Planning Department will work to reduce parking requirements in older neighborhoods and in other areas through a Better Neighborhoods type planning process with the support and input from local neighborhoods.~~	No corresponding Implementation Measure
	Implementation Measure 11.8.1: ~~The Planning Department, with the support and input from local neighborhoods, will study the impacts of reduced parking and private open space provisions and will consider revising the Planning Code accordingly.~~	No corresponding Implementation Measure
Policies Related to Encouraging Residential Density	Objective 4: Support affordable housing production by increasing site availability and capacity.	Objective 7: To increase land and improve building resources for permanently affordable housing.
	Policy 4.4: Consider granting density bonuses and parking requirement exemptions for the construction of affordable housing or senior housing.	Policy 7.3: Grant density bonuses for the construction of affordable or senior housing.
	Policy 11.6: ~~Employ flexible land use controls in residential areas that can regulate inappropriately sized development in new neighborhoods, in Downtown areas and in other areas through a Better Neighborhoods type planning process while maximizing the opportunity for housing near transit.~~	Policy 12.5: Relate land use controls to the appropriate scale for new and existing residential areas.
	Policy 11.9: ~~Set allowable densities and parking standards in residential areas at levels that promote the City's overall housing objectives while respecting neighborhood scale and character.~~	Policy 2.1: Set allowable densities in established residential areas at levels which will promote compatibility with prevailing neighborhood character.

Table VII-2
Comparison of 1990 Residence Element and Alternative B Objectives, Policies, and Implementation Measures That Could Affect the City Transportation Network

Impact	Alternative B	Corresponding 1990 Residence Element
	Implementation Measure 1.7.1: ~~In response to the increasing number of families in San Francisco, the Planning Department will develop zoning amendments to require a minimum percentage of larger family units ranging from two to four bedrooms, in new major residential projects. The Planning Department will also propose eliminating density requirements within the permitted building envelopes in Downtown areas and areas subject to a Better Neighborhoods type planning process to maximize family units constructed.~~	No corresponding Implementation Measure
	Policy 1.8: Allow new secondary units in areas where their effects can be dealt with and there is neighborhood support, especially if that housing is made permanently affordable to lower income households.	Policy 1.5: Allow new secondary units in areas where their effects can be dealt with and there is neighborhood support, especially if that housing is made permanently affordable to lower income households.
	Implementation Measure 4.4.1: The Planning Department will look at establishing uniform density bonus standards and equal requirements for affordable and senior housing development. Until then, affordable and senior housing projects will continue to be granted density bonuses and reduced parking requirements on a case-by-case basis.	No corresponding Implementation Measure
	Implementation Measure 11.7.1: ~~The Planning Department will work to reduce parking requirements in older neighborhoods and in other areas through a Better Neighborhoods type planning process with the support and input from local neighborhoods.~~	No corresponding Implementation Measure
	Implementation Measure 11.8.1: ~~The Planning Department, with the support and input from local neighborhoods, will study the impacts of reduced parking and private open space provisions and will consider revising the Planning Code accordingly.~~	No corresponding Implementation Measure

Notes: [1] The policies in this Table are not exhaustive and, where necessary, this TIS also addresses potential physical environmental impacts associated with the objectives, implementation measures, and strategies in the Housing Elements and project Alternatives.

[2] The Housing Elements and Alternatives contain additional themes beyond what is presented in this Table. However, those themes, which include (but are not limited to) Homelessness, Housing Condition, Seismic Safety, and Displacement, do not have associated policies that could result in potential environmental impacts.

Growth in Certain Areas

Similar to the 2004 Housing Element, Alternative B includes policies that would direct growth to certain areas of the City, although to a lesser degree than the 2004 Housing Element due to the policies eliminated under the trial court ruling. Alternative B Implementation Measures 1.3.2, 1.6.1, 2.6.4, 1.8.1, 1.9.2, 2.4.2, 8.6.1, and 11.4.2 could all result in directing growth to certain areas of the City. Unlike the 2004 Housing Element, Alternative B does not include policies that pertain to directing new development to transit-rich areas of the city, neighborhood commercial districts, Downtown and mixed-use areas. Therefore, Alternative B does not as aggressively promote housing growth in proximity to job cores, commercial areas, and areas served by transit. It is therefore anticipated that under Alternative B, less future development would occur in proximity to job cores, services and/or along transit lines as compared to development under the 2004 Housing Element. The 2009 Housing Element contains policies that would direct development to community planning areas and areas near transit (refer to 2009 Housing Element Policies 1.6, 1.7, 4.6, 12.1, 12.2, 13.1 and Implementation Measures 6, and 14 in *Section V.G. Transportation and Circulation*). As discussed in the analysis of the 2004 and 2009 Housing Elements under Impact TR-1 in *Section V.G. Transportation and Circulation*, policies that promote development close to jobs and services and/or along transit lines are intended to reduce citywide vehicle trips and promote use of alternative modes of transportation, such as transit, bicycling and walking. Therefore, without these policies, it is more likely that the 37 intersections anticipated to operate at unacceptable levels of service under future 2025 Cumulative Conditions (refer to Table V.F-1 in *Section V.F. Transportation and Circulation*) would continue to operate unacceptably.

Policies included in Alternative B include policies that advocate for zoning changes in many areas of the City that have undergone area planning processes, measures that call for rezoning of the City's industrial and commercial districts to provide mixed use neighborhoods, and encouraging housing along transit for specialized housing types (See Table VII-2). Thus, while Alternative B could result in some portion of future person trips shifting from private vehicles to transit, the amount would be reduced compared to the 2004 and 2009 Housing Elements (as noted above, Alternative B would promote residential growth in proximity to job cores, commercial areas, and along transit lines, but not as aggressively as the 2004 and 2009 Housing Elements). The analysis of the 2004 and 2009 Housing Elements under Impact TR-1 found that impacts to transit would be potentially significant under Cumulative Conditions in the year 2025. Under Alternative B, it is possible that encouraging housing in mixed use districts and in industrial and commercial districts where either housing is located in proximity to jobs, services and/or transit could potentially shift some trips to transit, although to a lesser degree than the 2004 or 2009 Housing Element. Given that Alternative B could potentially encourage increases in transit ridership, potentially above Muni's capacity utilization standard of 85 percent, and that SFMTA's fiscal emergencies may not allow for expanded transit service, adoption of and development of housing under Alternative B may result in a potentially significant impact on the City's transit system. Therefore, while this alternative would not eliminate this significant impact of the 2004 and 2009 Housing Elements, it might reduce the impact below the level expected with either the 2004 or 2009 Housing Element as proposed.

Parking Requirements

Alternative B does not contain any policies that would specifically modify parking impacts. Therefore, Alternative B would have similar impacts as the No Project Alternative (Alternative A) with respect to parking regulations. As discussed in the TIS, a reduced parking requirement is a strategy to encourage a shift in modes of transportation from private vehicles to transit, bicycling or walking. It is therefore anticipated that maintaining existing parking provisions could increase the number of vehicle trips citywide compared to those anticipated for the 2004 Housing Elements (which include reduced parking strategies), but not in excess of those anticipated under future 2025 Cumulative Conditions. Therefore, it is more likely that the 37 intersections anticipated to operate at unacceptable levels of service under future 2025 Cumulative Conditions (refer to Table V.F-1 in *Section V.F. Transportation and Circulation*) would continue to operate unacceptably under Alternative B than under the 2004 Housing Element. However, no changes are anticipated to the transit system under 2025 Cumulative Conditions as a result of Alternative B's parking policies.

Residential Density Provisions

Alternative B is similar to the No Project Alternative (Alternative A) in that it does not as aggressively promote increased residential density as the 2004 Housing Element. However, Alternative B includes Policies 2.2 and 2.3 from the 2004 Housing Element could increase residential density more generally throughout the City, as compared to the 2009 Housing Element policies that generally limit encouragement of increased densities to affordable housing projects and through community planning processes. As discussed in the TIS, increased residential density is correlated with reduced auto ownership and reduced VMT, resulting in overall beneficial impacts to the City transportation network. Therefore, the 2004 Housing Element would generally result in more beneficial impacts to the City transportation network than Alternative B, and Alternative B would have generally similar impacts to the transportation network as the 2009 Housing Element policies. Housing policies under Alternative B that would increase residential density generally throughout the City could promote the use of alternative transportation, shifting a portion of trips to transit. As discussed previously and as shown in Table VII-2, residential density provisions under Alternative B would be similar to the No Project Alternative (Alternative A), and these specific policies would not be anticipated to affect future 2025 Cumulative transit conditions as they do not include policies that encourage mode shift to transit via reduced parking and/or increased density on transit corridors.

Conclusion

As discussed above, Alternative B can be expected to result in an overall increase in citywide vehicle trips as compared to the 2004 and 2009 Housing Elements because Alternative B does not promote the use of alternative transportation to the degree that the 2004 and 2009 Housing Elements do, through the inclusion of either policies encouraging increased density or reduced parking strategies. However, the effects of future development on the roadway network would not be expected to exceed 2025 Cumulative Conditions because the housing element policies do not result in population growth. Furthermore,

Alternative B does not in itself allow any new residential development, and therefore would not generate any new person trips.

Alternative B does contain policies that direct growth towards job cores, commercial areas and/or transit more so than the No Project Alternative/Alternative A (see Table VII-2), but not as aggressively as the 2004 and 2009 Housing Elements. Under 2025 Cumulative Conditions, the California Street and Market Street Subway transit corridors are anticipated to operate near Muni's transit capacity utilization standard of 85 percent in 2025 (refer to Table V.F-2 in *Section V.F. Transportation and Circulation*). Alternative B would not directly result in the development of housing and it would not add any new trips under 2025 Cumulative Conditions. However, as noted in the prior discussion of *Development Assumptions by Alternative*, Alternative B contains policies that encourage a mode shift to transit. A substantial mode shift to transit could adversely affect the public transit system. Given that Alternative B includes policies that could potentially encourage increases in transit ridership above Muni's capacity utilization standard of 85 percent, and that SFMTA's fiscal emergencies may not allow for expanded transit service, Alternative B may result in a potentially significant impact on the City's transit system. This is similar to the significant unavoidable transit impact anticipated under the 2004 and 2009 Housing Elements, but would be expected to occur to a lesser extent because prevailing residential densities and parking ratios would remain, resulting in less of a shift to transit.

Noise

Similar to the 2004 Housing Element and 2009 Housing Element, the City is neither within an airport land use plan area, nor within two miles of a public airport or public use airport, nor within the vicinity of a private airstrip. Therefore, Alternative B would have ***no impact*** with respect to airport noise.

2004 Housing Element Comparison

As noted under the discussion of *Development Assumptions by Alternative*, unlike the 2004 Housing Element, Alternative B would not promote increased density to the same degree as the 2004 or 2009 Housing Elements. Less density would result in a reduced intensity of housing construction, which would result in less noise-generating activity associated with new housing construction. Therefore, as with the 2004 Housing Element addressed under Impact NO-1 in *Section V.G. Noise*, Alternative B would not result in a significant noise impact during construction, due in part to expected compliance with the City's noise ordinance. Similar to the 2004 Housing Element, Alternative B would not result in an increase in demolition, which would create demolition-related noise. Both Alternative B and 2004 Housing Element recognize the need for the retention and maintenance of existing housing. Therefore, similar to the analysis of the 2004 Housing Element under Impact NO-2, impacts from exposure of people to or generation of excessive groundborne vibration or groundborne noise from demolition would be **less than significant**.

Both Alternative B and the 2004 Housing Element include policies that direct growth to certain areas of the City and policies that promote increased density (see Table VII-1). However, Alternative B promotes increased density and housing in non-residential areas to a lesser extent than the 2004 Housing Element,

due to the elimination of certain policies under Alternative B. Regardless, impacts related to a substantial permanent increase in ambient noise levels would be ***less than significant*** under Alternative B for reasons similar to those provided in the analysis of the 2004 Housing Element under Impact NO-3 in *Section V.G Noise*. Namely, all new residential development would be subject to compliance with existing laws and regulations applicable to this issue, resulting in a less than significant impact.

Alternative B would reduce the intensity of housing construction on in-fill sites in industrial and commercial areas as compared with the 2004 Housing Element. This would reduce the potential for exposing residents to higher noise levels associated with these types of non-residential uses; therefore, this impact would be incrementally less than under the 2004 Housing Element. However, as with the 2004 Housing Element, compliance with Title 24 may not mitigate exterior noise on private open space, or other site-specific conditions may warrant acoustical monitoring and analysis beyond that required for Title 24 compliance. Therefore, for reason similar to those provided in the analysis of the 2004 Housing Element under Impact NO-4, Alternative B could result in a significant impact with respect to exposing noise sensitive receptors to noise levels in excess of established standards and promoting residential development that may be substantially affected by existing noise levels. However, also similar to the 2004 Housing Element, compliance with Mitigation Measure M-NO-1 would reduce Alternative B's impact on noise sensitive receptors to ***less than significant with mitigation.***

2009 Housing Element Comparison

As noted under the discussion of *Development Assumptions by Alternative*, compared to the 2009 Housing Element, Alternative B would not promote as much increased housing density and, therefore, the intensity and duration of housing construction. This reduced intensity of housing construction would result in less noise-generating activity associated with new housing construction. Therefore, as with the 2009 Housing Element addressed under Impact NO-1 in *Section V.G. Noise*, Alternative B would not result in a significant noise impact during construction, due in part to expected compliance with the City's noise ordinance. Similar to the 2009 Housing Element, development under Alternative B would not result in an increase in demolition, which would create demolition-related noise. Both Alternative B and the 2009 Housing Element recognize the need for the retention and maintenance of existing housing. Alternative B's housing policies would promote housing construction in Downtown and other areas through floor-to-area ratio exemptions (Implementation Measure 1.6.1), which could increase density in these specific areas and increase construction-related noise and expose more future residents to traffic and stationary noise sources. Similar to the 2009 Housing Element, Alternative B would consider public health objectives when designating housing sites. Therefore, similar to the analysis of the 2009 Housing Element in *Section V.G. Noise*, Alternative B would not expose more people to excessive groundborne vibration or noise or locate residential uses near site unsuitable for housing (Impact NO-2), and this impact would be ***less than significant.*** Alternative B could result in incrementally less exposure of people to non-residential noise sources than the 2009 Housing Element due to the reduced promotion of density.

Both Alternative B and the 2009 Housing Element include policies that direct growth to certain areas of the City and policies that promote increased density. However, Alternative B promotes increased housing density to a lesser extent than the 2009 Housing Element. Regardless, impacts related to a substantial

permanent increase in ambient noise levels would be less than significant under Alternative B for reasons similar to those provided in the analysis of the 2009 Housing Element under Impact NO-3 in *Section V.G Noise*. Namely, all new residential development would be subject to compliance with existing laws and regulations applicable to this issue, resulting in a ***less than significant*** impact.

As with the analysis of the 2009 Housing Element provided under Impact NO-4 regarding exposure to or generation of noise levels in excess of applicable standards, compliance with Title 24 may not mitigate exterior noise on private open space or other site-specific conditions may warrant acoustical monitoring and analysis beyond that required for Title 24 compliance. Therefore, as with the 2009 Housing Element, Alternative B could result in a significant impact with respect to exposing noise sensitive receptors to noise levels in excess of established standards and promoting residential development that may be substantially affected by existing noise levels. Compliance with Mitigation Measure M-NO-1: Interior and Exterior Noise, would reduce Alternative B's impact on noise sensitive receptors to ***less than significant with mitigation***, similar to the 2009 Housing Element. Overall, these impacts would be less than noise impacts under the 2009 Housing Element due to the anticipated reduction in housing density (and intensity) under Alternative B, but would remain ***less than significant with mitigation.***

Air Quality

2004 and 2009 Housing Element Comparison

As discussed under Impact AQ-1 in *Section V.H. Air Quality*, consistency of the proposed Housing Elements with regional air quality plans can be determined by comparing the growth factors used for the proposed Housing Element with those used in the most recently adopted regional air quality plan, the Bay Area 2005 Ozone Strategy. The 2005 Ozone Strategy growth assumptions for Bay Area communities are based on ABAG's Projections. The Housing Elements are based on regional growth projections provided by the AGAG. This RHNA, in turn, is based on ABAG population projects. As both the 2004 and 2009 Housing Elements and the 2005 Ozone Strategy utilize ABAG projections, the 2004 and 2009 Housing Elements would not result in a significant impact on regional air quality planning efforts. For reasons similar to those detailed under Impact AQ-1, Alternative B would result in a ***less than significant*** impact on regional air quality.

Although the 2004 and 2009 Housing Elements would not directly result in the construction of residential units, 2004 and 2009 Housing Elements policies could indirectly contribute to an existing or projected air quality violation by promoting increased density in certain areas of the City, thereby consolidating new construction within those areas. The policies of Alternative B would not promote increased density to the same degree as the 2004 and 2009 Housing Elements. Thus, compared to Alternative B, increased density standards under the 2004 and 2009 Housing Elements could promote longer construction durations associated with construction of buildings containing a greater number of units, which could result in an increase in construction emissions for the construction project. Therefore, localized air quality impacts from construction emissions would be incrementally reduced under Alternative B. However, for reasons similar to those provided under Impact AQ-2 in *Section V.H. Air Quality* analyzing the 2004 and 2009 Housing Elements, construction impacts related to air quality standards under Alternative A would remain

less than significant. Alternative B would encourage fewer housing units near transit than either the 2004 or 2009 Housing Elements and therefore, development under Alternative B could result in incrementally greater impacts to air quality due to an increase in Vehicle Miles Traveled. However, any increase in Vehicle Miles Traveled associated with Alternative B would be minor, and for the reasons described under Impact AQ-2, impacts related to air quality standards due to development under Alternative B would be ***less than significant.***

Similar to the assessment of the 2004 or 2009 Housing Elements under Impact AQ-3, Alternative B would not expose residents to TACs because all future housing units would be required to undergo review which would include consideration of the location of industrial sites or other sources of air pollution in the design of the residential building, to orient air intakes away from the sources of pollution. Therefore, for reasons similar to those provided under Impact AQ-3 addressing exposure of sensitive receptors to substantial pollutants, the impact under Alternative B would be ***less than significant.***

Similar to the assessment of the 2004 and 2009 Housing Elements under Impact AQ-4 in *Section V.H. Air Quality*, Alternative B would encourage the construction of housing and would not result in the creation of objectionable odors.

Overall, impacts to air quality under Alternative B could be incrementally greater than under the 2004 and 2009 Housing Elements due to potential increases in Vehicle Miles Traveled. However, this impact would still be ***less than significant.***

Greenhouse Gases

2004 Housing Element Comparison

Both Alternative B and the 2004 Housing Element include policies that would ultimately result in reduced GHG emissions per capita by encouraging: (1) housing in proximity to job cores, neighborhood services, and/or transit; (2) increased housing density; (3) infill development; (4) preservation of existing housing stock; and (5) energy efficiency. However, development under Alternative B could result in smaller/less dense projects than development under the 2004 Housing Element and would therefore not result in the same energy savings as the 2004 Housing Element (energy savings is generally increased in denser development due to enhanced insulating qualities and other efficiencies). Therefore, given that Alternative B would not reduce GHG to the same extent as the 2004 Housing Element, this impact could be incrementally greater than under the 2004 Housing Element, but would remain ***less than significant,*** as discussed in Impact GH-1 under *Section V.I. Greenhouse Gas Emissions*.

2009 Housing Element Comparison

Both Alternative B and the 2009 Housing Element include policies that would ultimately result in reduced GHG emissions per capita. These policies include providing housing: (1) in proximity to job cores, neighborhood services, and/or transit; (2) by increasing housing density; (3) encouraging infill development; (4) preservation of existing housing stock or adaptive reuse of existing buildings; and (5)

promoting energy efficiency. Each of these strategies could result in GHG emissions reductions. Both Alternative B and the 2009 Housing Element include policies that promote infill development, preservation the City's existing housing stock, and energy efficiency of new development. However, Alternative B would not promote increased density to the same extent as the 2009 Housing Element, and denser development can result in a decrease in GHG's per capita. Therefore, overall impacts from Alternative B could be incrementally greater than the 2009 Housing Element, although ***less than significant*** for the reasons discussed in Impact GH-1 under *Section V.I. Greenhouse Gas Emissions*.

Wind and Shadow

2004 and 2009 Housing Elements Comparison

As noted above under *Development Assumptions by Alternative*, Alternative B promotes density to a lesser degree than the 2004 and 2009 Housing Elements. Additionally, Alternative B could result in the construction of smaller buildings. However, height limits would remain under the 2004 and 2009 Housing Elements and the difference in the size of buildings overall would only potentially be incremental. Wind impacts are project-specific and projects are subject to the Planning Department's procedures requiring modification of any new building or addition that exceeds the wind or criterion. Specifically, new residential units must comply with the applicable federal, state, and local regulations including Sections 147, 148, 243(c)(9), 249.1(b)(2), and 263.11(c) of the San Francisco Planning Code. As assessed in Impact WS-1 in *Section V.J. Wind and Shadow*, the incremental change in wind impacts from existing conditions resulting from the 2004 and 2009 Housing Elements would not be substantial because wind impacts from new housing development would be subject to applicable regulations limiting or, in the case of wind, avoiding such impacts. Thus, for similar reasons as those noted under Impact WS-1 (i.e., compliance with regulations noted above), wind impacts under Alternative B would not be substantial. Therefore, this impact would be the same as the 2004 and 2009 Housing Elements and would be ***less than significant*** impact with respect to the alteration of wind patterns.

Because Alternative B encourages density to a lesser extent, this alternative could result in lower building in certain areas compared to the 2004 and 2009 Housing Elements. Because Alternative B directs new housing to Downtown, where wind and shadow impacts are most commonly found, the potential for these impacts would be incrementally increased as compared to Alternative A (No Project). However, as discussed under Impact WS-2 in *Section V.J. Wind and Shadow*, shadow impacts are project-specific and all applications for new construction or additions to existing buildings above 40 feet in height are reviewed by the Planning Department to determine whether such shading might occur and if a project would result in new shadow, that shadow is evaluated for significance under CEQA. Furthermore, new residential units would comply with the applicable federal, state, and local regulations including Sections 146(a), 146(c), and 295 of the San Francisco Planning Code. Potential shadow impacts under Alternative B would be subject to the same processes and requirements as those noted in Impact WS-2 for the 2004 and 2009 Housing Elements. Therefore, this impact would be the same as the 2004 and 2009 Housing Elements and Alternative B would have a ***less than significant*** impact with respect to the creation of new shadows.

Recreation

Similar to the 2004 Housing Element and 2009 Housing Element, Alternative B would not directly increase the use of recreational facilities because it would not directly result in population growth or generate new development. However, as noted in *Section V.K. Recreation*, both the 2004 and 2009 Housing Element have the potential for secondary effects on recreational facilities resulting from promoting new housing in certain areas, and subsequently resulting in physical deterioration of existing recreation facilities. The City currently has a ratio of 7.0 acres of open space per 1,000 San Francisco residents and the City has not established a citywide target ratio of parkland to residents, nor has it adopted a Quimby Act ordinance. Many open space acquisitions/expansions have been identified by the Planning Department and San Francisco Recreation and Park Department, independent of Alternative B and the proposed Housing Elements. Furthermore, SFRPD would continue to acquire new open space/recreation facilities pursuant to Proposition C (open space fund discussed in *Section V.K. Recreation*). New housing development would be required to comply with Planning Code requirements for open space.

2004 Housing Element Comparison

Alternative B does not propose any recreational facilities. Alternative B would not directly increase the use of recreational facilities because it would not directly result in population growth.

Similar to the analysis provided under Impact RE-1 (impacts related to new or expanded recreational facilities) and Impact RE-2 (physical degradation of existing recreational facilities) in *Section V.K. Recreation*, Alternative B could result in an increase in 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, or could create the need for new facilities by directing the growth of new housing. Unlike the 2004 Housing Element Policy 11.8.1, which calls for studying reduced private open space and potential revisions to the Planning Code, Alternative B does not propose to allow reductions to private open space requirements. Reductions in private open space could increase the potential for greater use of public recreation facilities, accelerating deterioration of existing facilities or creating the need for new facilities. Any such impacts under Alternative B therefore would be expected to be incrementally less than under the 2004 Housing Element. Moreover, any specific proposals for the development of park space or recreation facilities would be subject to subsequent project-level environmental review. Therefore, similar to the 2004 Housing Element, impacts related to increased use or the construction or expansion of recreational facilities would be ***less than significant.***

2009 Housing Element Comparison

The 2009 Housing Element supports more limited consideration of reductions to required open space than the 2004 Housing Element, and contains policies and implementation measures that would serve to discourage such reductions in areas that are currently underserved with recreational facilities (Policy 12.2). Additionally, as discussed above, Alternative B does not propose to allow for the reduction of private open space. Therefore, the impacts of Alternative B would be expected to be somewhat less than

those of the 2009 Housing Element with regard to increased use of parks resulting in deterioration or the need for new facilities, for reason similar to those provided under Impact RE-1 and Impact RE-2 in *Section V.K Recreation.* Alternative B itself does not propose any recreational facilities. Alternative B would not directly increase the use of recreational facilities because it would not directly result in population growth. The City has not established a citywide target ratio of parkland to residents, nor has it adopted a Quimby Act ordinance. Therefore, the City would not be required to provide or construct additional recreational facilities in response to any population growth. Specific proposals for the development of park space or recreation facilities would be subject to subsequent project-level environmental review. Similar to the 2009 Housing Element, as discussed under Impact RE-1 and RE-2 in *Section V.K Recreation*, impacts related to increased use of parks and recreational facilities, or the construction or expansion of recreational facilities would be ***less than significant.***

Utilities and Service Systems

2004 and 2009 Housing Elements Comparison

As discussed under *Section V.L. Utilities and Service Systems*, the City requires NPDES permits, as administered by the SFBRWQCB, according to federal regulations for both point source discharges (a municipal or industrial discharge at a specific location or pipe) and nonpoint source discharges (diffuse runoff of water from adjacent land uses) to surface waters of the United States. For point source discharges, such as sewer outfalls, each NPDES permit contains limits on allowable concentrations and mass emissions of pollutants contained in the discharge. New construction could result in impacts related to water or wastewater treatment facilities if new housing would results in additional need for water or wastewater treatment in areas that do not have the available capacity to transport or process the additional water or wastewater. This could require the construction or expansion of water or wastewater treatment facilities. Although the 2004 Housing Element and 2009 Housing Element would not directly result in the construction of residential units, all new development would be required to comply with all provisions of the NPDES program, as enforced by the RWQCB. Therefore, adoption of the proposed Housing Elements would not result in an exceedance of wastewater treatment requirements. Additionally, the NPDES Phase I and Phase II requirements would regulate discharge from construction sites. All new development would be required to comply with all applicable wastewater discharge requirements issued by the SWRCB and RWQCB and would not exceed applicable wastewater treatment requirements of the RWQCB with respect to discharges to the sewer system or stormwater system within the City. Therefore, similar to the 2004 and 2009 Housing Element assessed under Impact UT-1 *Section V.L. Utilities and Service Systems*, Alternative B would have a ***less than significant*** impact with respect to the exceedance of wastewater treatment requirements.

As discussed under the assessment of new or expanded water or wastewater facilities under Impact UT-2, policies provided under the 2004 and 2009 Housing Element would not directly result in the construction of residential units. This is also the case under Alternative B. Further, all new housing development would be required to comply with all applicable regulations (e.g., Article 4.1 of the San Francisco Public Works Code), regardless of housing element policies. As explained under Impact UT-2, policies that increase density could be achieved by the construction of multifamily housing, which uses less water than

single-family homes and may result in less landscaping that requires irrigation. Therefore, increasing multifamily housing may reduce the need for new or expanded water and sewer hookups. Alternative B does not promote increased density as aggressively as the 2004 or 2009 Housing Elements, so it is possible that incrementally less multifamily housing would be constructed under Alternative B. However, while incremental differences could result under Alternative B, for reasons similar to those provided under Impact UT-2, this impact would remain ***less than significant***.

Development and construction under Alternative B could potentially result in an increase of impervious surfaces on sites that could increase the rate of runoff, exceeding the capacity of stormwater drainage facilities, as discussed under Impact UT-3 in *Section V.L. Utilities and Service Systems*. Alternative B would not increase the density of housing construction to the same extent as the 2004 and 2009 Housing Elements and could incrementally result in more buildings that are less dense. Therefore, the resulting stormwater runoff impacts under Alternative B may differ incrementally from the 2004 and 2009 Housing Elements. Regardless, all new residential development would be required to comply with federal, state, and local regulations, including the City's Green Building Ordinance, and the Green Landscaping Ordinance. Therefore, similar to the impacts from impervious surfaces from the 2004 and 2009 Housing Elements assessed under Impact UT-3, Alternative B impacts would be ***less than significant***, but incrementally smaller than the 2004 and 2009 Housing Elements due to the reduced density of housing units.

This EIR considers the degree to which construction of housing could potentially result in the need for new or expanded water supply resources or entitlements because increased density could result in inadequate water supply. However, as noted in the assessment of the 2004 and 2009 Housing Elements under Impact UT-4 in *Section V.L. Utilities and Services*, all new development would be required to comply with federal, state, and local regulations, including the City's Green Building Ordinance, Water Supply Availability Study, North Basin Groundwater Management Plan, WSIP, Article 21 of the San Francisco Public Works Code, and the Residential Water Conservation Ordinance. These would also apply under Alternative B. Therefore, impacts to water supply from Alternative B would be similar, but incrementally smaller than the 2004 and 2009 Housing Elements due to the decrease in the promotion of density. For reasons similar to those provided under Impact UT-4, impacts related to water demand from Alternative B would be ***less than significant***.

New housing constructed consistent with Alternative B would require solid waste disposal. As further discussed under *Section V.L. Utilities and Service Systems*, according to AB 939, all cities and counties in California are required to divert 25 percent of all solid waste to recycling facilities from landfill or transformation facilities by January 1, 1995, and 50 percent by January 1, 2000. As of 2006, the most recent year for which Board-reviewed rates are available, the City achieved a diversion rate of 70 percent. Additionally, City policies (including Chapter 19, "Mandatory Recycling and Composting Ordinance") require all persons located in San Francisco to separate recyclables, compostables and landfilled trash and participate in recycling and composting programs and provide enforcement mechanisms and penalties for violations. Alternative B would not be expected to change compliance levels with City ordinances. Therefore, similar to the 2004 and 2009 Housing Element, Alternative B would have ***no impact*** related to compliance with solid waste statutes and regulations

As discussed under Impact UT-5, Similar to the 2004 and 2009 Housing Elements, additional collection trucks and personnel could be required to provide solid waste services to new housing. However, all new development would be required to comply with the previously discussed state and local regulations, including the City's Green Building Ordinance, Ordinance No. 27-06, and the Mandatory Recycling and Composting Ordinance (all of which contribute to the City's goal of zero waste by 2020). Therefore, for the same reasons provided under Impact UT-5, impacts to solid waste disposal from Alternative B would ***less than significant.***

Public Services

2004 and 2009 Housing Elements Comparison

Overall population growth projected for San Francisco would result in an increase in the number of people requiring fire protection or police services. As discussed under *Development Assumptions by Alternative*, Alternative B would not as aggressively promote density as the 2004 or 2009 Housing Elements and would be more likely to result in smaller/less dense projects. As discussed in Impact PS-2, adoption of Housing Elements would not result in an increase the City's overall population; rather the Housing Elements provide direction for where increased residential units should be developed. As the City grows, the service areas for public services including police, fire and health care facilities would be reevaluated and resources would be reallocated to accommodate the needs in specific parts of the City, if and when conditions warrant. New development would be required to comply with current seismic and life safety requirements of the San Francisco Building and Fire Code. Therefore, for reasons discussed in Impact PS-1, PS-2 and PS-5 in *Section V.M. Public Services*, impacts to police, fire and health care facilities under Alternative B would be similar to the 2004 and 2009 Housing Elements and would be ***less than significant.***

As discussed under Impact PS-3 (assessing impacts on school facilities), new residential development is assessed a development fee on a per square foot basis for school facilities. Therefore, for the reasons discussed in Impact PS-3, Alternative B would similarly result in a ***less than significant*** impact to school facilities. Lastly, as explained in PS-4, with regards to library facilities, the SFPL does not anticipate its facilities to reach capacity within the horizon year of this EIR and responds to increased population in certain areas by increasing service hours. Therefore, for the reasons described in PS-4, Alternative B would similarly result in ***less than significant*** impacts to library services.

Biological Resources

2004 and 2009 Housing Element Comparison

Similar to the impacts detailed in *Section V.N. Biological Resources* for the 2004 and 2009 Housing Element, Alternative B could result in impacts related to biological resources if new projects result in disturbance from construction activities, tree removal, construction on or near wetlands or sensitive habitats or riparian areas, interference with migration, take of special status-species (e.g., development/redevelopment of abandoned buildings that provide habitat for bats could impact those

species), application of pesticides and herbicides, construction of tall buildings with glass walls that could increase bird strikes and possibly interrupt a migration corridor, or conflict with provisions of an adopted habitat conservation plan. All housing constructed under Alternative B would be required to comply with the Open Space Element of the San Francisco General Plan, Chapter 8 of the San Francisco Environment Code, San Francisco's Green Building Ordinance, San Francisco's IPM Ordinance, San Francisco's Tree Protection Ordinance, and San Francisco's Urban Forestry Ordinance, which would minimize impacts related to biological resources to less than significant levels. Overall, impacts to biological resources under Alternative B would be similar to the 2004 and 2009 Housing Element and would remain ***less than significant*** for similar reasons to those provided under Impact BI-1 in *Section V.N Biological Resources.*

Geology and Soils

The San Francisco Bay Area and surrounding areas are characterized by numerous geologically young faults. However, there are no known fault zones or designated Alquist-Priolo Earthquake Fault Zones in the City. Therefore, similar to the 2004 and 2009 Housing Elements as assessed in *Section V.O Geology and Soils*, there would be ***no impact*** with respect to rupture of a known earthquake fault under Alternative B. Additionally, development under Alternative B would not involve the use of septic tanks or alternative wastewater disposal systems. Therefore, similar to the 2004 and 2009 Housing Elements, there would be ***no impact*** with respect to septic tanks or alternative wastewater disposal systems under Alternative B.

2004 Housing Element Comparison

Similar to the 2004 Housing Element, new housing constructed consistent with Alternative B could expose people and structures to geologic risks, including from rupture of a known earthquake fault, groundshaking, ground failure, or liquefaction. Additionally, housing development could be located on expansive or unstable ground, or on or near an earthquake fault, or areas prone to landslides. New housing could also increase density in especially geologically hazardous areas or increase risk for housing units not constructed or maintained in a seismically sound manner. In addition, increasing density, though to a lesser extent under Alternative B, could result in heavier buildings, which could increase the weight on soil beyond what it has previously experienced. Such impacts resulting from development under Alternative B are similar to those from development under the 2004 Housing Element, as detailed under Impact GE-1 (seismic risks) and Impact GE-3 (unstable soils) in *Section V.O. Geology and Soils.* However, as noted in that analysis, federal, state, and local regulations have been adopted to reduce impacts from seismic hazards. These regulations include the SFBC, Earthquake Hazards Reduction Act, Alquist-Priolo Earthquake Fault Zoning Act, and Seismic Hazards Mapping Act of 1990. Therefore, for reasons similar to those provided under Impact GE-1 and Impact GE-3 for the 2004 Housing Element, impacts under Alternative B would remain ***less than significant.***

Housing construction under Alternative B could result in soil erosion through the need for grading activities. As noted under the assessment of this issue for the 2004 Housing Element under Impact GE-2, all new development would be required to comply with regulations, including State and City Building Codes that include regulations that have been adopted to reduce impacts from grading and erosion. Thus,

similar to the 2004 Housing Element, impacts related to soil erosion under Alternative B would be ***less than significant***.

As noted under Impact GE-4 assessing expansive soils, the State of California provides minimum standards for building design through the California Building Code, including standards that must be met for construction on expansive soils. Additionally, this impact might be further reduced under Alternative B compared to the 2004 Housing Element due to the decreased promotion of density if fewer sites and/or smaller buildings are developed. Similar to the reasons provided in the assessment of expansive soils impacts for the 2004 Housing Element under Impact GE-4, the impacts of Alternative B would be ***less than significant.***

Similar to the 2004 Housing Element, residential development policies of Alternative B could require grading activities that have the potential to substantially change the topography or any unique geologic or physical features on project sites. However, as noted under the assessment of the 2004 Housing Element under Impact GE-5, grading impacts are project-specific and all grading and building permit applications for new construction or additions to existing buildings would be reviewed by the Planning Department to determine whether grading activities might occur with the potential to substantially change the topography of a project site. Furthermore, as part of the permitting process, construction activities for new residential units would be required to comply with the SFBC regulations related to grading and excavation activities and project design plans would be subject to review by the City's Planning Department for consistency with policies related to land alteration. This impact would be further reduced under Alternative B due to the decreased promotion of density. Similar to Alternative B, this impact would be less than significant. Overall, impacts to geology and soils from Alternative B would be similar as the 2004 Housing Element and ***less than significant***.

2009 Housing Element Comparison

Similar to the 2009 Housing Element, new housing could expose people and structures to geologic risks, including from rupture of a known earthquake fault, groundshaking, ground failure, or liquefaction. Additionally, housing development could be located on expansive or unstable ground, or on or near an earthquake fault, or areas prone to landslides. New housing could also increase density in especially geologically hazardous areas or increase risk for housing units not constructed or maintained in a seismically sound manner. In addition, increasing density, though to a lesser extent under Alternative B than under 2009, could result in heavier buildings, which could increase the weight on soil beyond what it has previously experienced. Such impacts resulting from the 2009 Housing Element are detailed under Impact GE-1 (seismic risks) and Impact GE-3 (unstable soils) in *Section V.O. Geology and Soils*. However, as noted in that analysis, federal, state, and local regulations have been adopted to reduce impacts from seismic hazards. These regulations include the San Francisco Building Code (SFBC), Earthquake Hazards Reduction Act, Alquist-Priolo Earthquake Fault Zoning Act, and Seismic Hazards Mapping Act of 1990. Therefore, for reasons similar to those provided under Impact GE-1 and Impact GE-3 for the 2009 Housing Element, impacts under Alternative B would remain ***less than significant***.

Housing construction under Alternative B could result in soil erosion through the need for grading activities. As noted under the assessment of this issue from the 2009 Housing Element under Impact GE-2, all new development would be required to comply with regulations, including State and City Building Codes that include regulations that have been adopted to reduce impacts from grading and erosion. Thus, similar to the 2009 Housing Element, impacts related to soil erosion under Alternative B would be ***less than significant.***

As noted under Impact GE-4 (expansive soils), the State of California provides minimum standards for building design through the CBC, including standards that must be met for construction on expansive soils. Additionally, this impact would be further reduced under Alternative B due to the decreased promotion of density. Similar to the reasons provided in the assessment of expansive soils impacts for the 2009 Housing Element under Impact GE-4, the impacts under Alternative B would be ***less than significant.***

Similar to the 2009 Housing Element, residential development policies of Alternative B could require grading activities that have the potential to substantially change the topography or any unique geologic or physical features on project sites. However, as noted under the assessment of the 2009 Housing Element under Impact GE-5, grading impacts are project-specific and all grading and building permit applications for new construction or additions to existing buildings would be reviewed by the Planning Department to determine whether grading activities might occur with the potential to substantially change the topography of a project site. Furthermore, as part of the permitting process, construction activities for new residential units would be required to comply with the SFBC regulations related to grading and excavation activities and project design plans would be subject to review by the City's Planning Department for consistency with policies related to land alteration. Similar to the 2009 Housing Element, this impact would be less than significant. Overall, impacts to geology and soils from Alternative B would be similar as the 2009 Housing Element and ***less than significant.***

Hydrology and Water Quality

2004 and 2009 Housing Elements Comparison

Similar to the 2004 and 2009 Housing Elements, Alternative B would promote increased housing density. However, as discussed under Impact HY-1 in *Section V.P. Hydrology and Water Quality*, while adoption of the Housing Element would not by itself result in the construction of new housing, policies that promote how and where housing is developed could result in impacts related to water quality standards, waste discharge requirements, or otherwise degrade water quality. Regardless, all new housing would be subject to compliance with existing regulations that serve to limit such impacts, including Article 4.1 of the San Francisco Public Works Code and the City's industrial waste pretreatment program to regulate the discharge of pollutants into the sewage system, and Water Quality Protection Program. Therefore, for reasons similar to those provided under Impact HY-1 addressing water quality standards, this impact would remain ***less than significant*** under Alternative B.

Similar to the discussion of the 2004 and 2009 Housing Elements under Impact HY-3 and Impact HY-4, Alternative B would potentially alter existing drainage patterns through grading and construction activities. Because the City is an urban setting and development typically involves the reuse of already developed sites, new construction usually has no long-term effect on existing drainage patterns. However, the City also has locations with steep slopes and development in these locations can affect drainage patterns. This impact could be incrementally reduced under Alternative B in comparison to the 2004 and 2009 Housing Elements due to the decreased promotion of density under Alternative B. However, similar to the 2004 and 2009 Housing Elements, development under Alternative B would be required to comply with the previously discussed federal, state, and local regulations, including Article 4.1 of the San Francisco Public Works Code and the City's industrial waste pretreatment program to regulate the discharge of pollutants into the sewage system, Water Quality Protection Program, the City's Stormwater Management Plan, the City's Construction Site Runoff Pollution Prevention Program requirements that are described in the City's Construction Site Water Pollution Prevention Program, and forthcoming SFPUC development and redevelopment guidelines. Therefore, for reasons similar to those provided for in the analysis of the 2004 and 2009 Housing Elements under Impact HY-3 and Impact HY-4 in *Section V.P. Hydrology and Water Quality*, impacts with respect to the rate, volume, or quality of runoff would be ***less than significant*** under Alternative B.

Construction of housing consistent with Alternative B could require dewatering or result in groundwater drawdown. Similar to the discussion of the 2004 and 2009 Housing Elements under Impact HY-2 in *Section V.P. Hydrology and Water Quality*, although short-term construction groundwater dewatering may be necessary at certain locations (e.g., for installation of building foundations or underground utilities), dewatering would be regulated by the SFPUC and would have only a minor temporary effect on the groundwater table elevation in the immediate vicinity of the activity, and would not measurably affect groundwater supplies. For the same reasons, this impact under Alternative B would be similar to the 2004 and 2009 Housing Elements and would remain ***less than significant.***

Similar to the discussion of the 2004 and 2009 Housing Elements under Impact HY-5, new housing construction consistent with Alternative B could result in the construction of housing in 100-year flood hazard areas that would be subject to or could impede or redirect flood flows. However, similar to the 2004 and 2009 Housing Elements, all new development would be required to comply with federal, state, and local regulations. Development under Alternative B would not specifically direct housing to a flood area as shown in Figure V.P-1 and -2. However, if fewer units are constructed on a per parcel basis (i.e., reduced density of housing compared with the 2004 Housing Element) less units might be located within flood zones. For reasons similar to those provided under Impact HY-5 for the 2004 and 2009 Housing Elements, the impact under Alternative B would be ***less than significant.***

Additionally, new construction could result in impacts related to flooding if housing is placed near above ground reservoirs and tanks. However, the City monitors all reservoirs in the City and is completing a project that will significantly reduce any risks of flooding from the City's reservoirs, including the Sunset Reservoir. Therefore, impacts from development under Alternative B regarding dam inundation would be similar to those detailed under Impact HY-6 for the 2004 and 2009 Housing Elements, and would be ***less than significant.***

New construction under Alternative B could result in impacts related to seiche, tsunami, or mudflow if housing is placed near open water, near bodies of water, or near steep slopes in the City. This impact is detailed under Impact HY-7 in *Section V.P. Hydrology and Water Quality* Similar to the 2004 and 2009 Housing Elements, all new development under Alternative B would be required to comply with applicable federal, state, and local regulations, including the Department of Building Inspection's approval of the final plans for any specific development; therefore, similar to the 2004 and 2009 Housing Elements assessed under Impact HY-7, this impact would be ***less than significant*** under Alternative B.

Hazards/Hazardous Materials

The City is neither within an airport land use plan area, nor within two miles of a public airport or public use airport, nor within the vicinity of a private airstrip. Therefore, similar to the 2004 Housing Element or 2009 Housing Element, development under Alternative B would have ***no impact*** with respect to air safety.

2004 and 2009 Housing Elements Comparison

Similar to the 2004 and 2009 Housing Elements, Alternative B could promote increased density of housing construction compared to existing patterns, potentially resulting in the increased transport, use, or disposal of hazardous materials and impacts related to the potential for hazardous materials upset or accident conditions. Similar to the 2004 and 2009 Housing Elements, Alternative B encourages new housing in Downtown, in underutilized commercial and industrial areas, neighborhood commercial districts, and mixed use districts. This could result in construction of housing in areas where hazardous materials are used or have been used in the past. However, all new development would be required to comply with federal, state, and local regulations, including the EOP, Hazard Mitigation Plan, San Francisco Public Works Code, All-Hazards Strategic Plan, and San Francisco Public Health Code. Similar to the 2004 and 2009 Housing Elements assessment provided under impact HZ-1 in *Section V.Q. Hazards and Hazardous Materials*, impacts with respect to the routine transport, use, or disposal of hazardous materials from development under Alternative B would be ***less than significant.***

Development under Alternative B could result in impacts related to the risk of upset and accident conditions involving hazardous materials (Impact HZ-2) because new housing construction could increase the amount of transport of hazardous materials for delivery and disposal purposes, which could in turn increase the risk of upset and accident conditions during transport. The assessment for this issue for the 2004 and 2009 Housing Elements is provided under Impact HZ-2 in *Section V.Q. Hazards and Hazardous Materials*. All new housing development would be required to comply with all applicable federal, state, and local regulations, including the EOP, Hazard Mitigation Plan, San Francisco Public Works Code, All-Hazards Strategic Plan, and San Francisco Public Health Code. Therefore, this impact under Alternative B would remain ***less than significant*** compared to the 2004 and 2009 Housing Elements, for reasons similar to those provided under Impact HZ-2.

Under Alternative B, housing construction could occur on sites that have been identified as being contaminated from the release of hazardous substances in the soil, including industrial sites, sites

containing leaking underground storage tanks, and large and small-quantity generators of hazardous waste. The assessment of this issue is provided under Impact HZ-3 and Impact HZ-4 in *Section V.Q. Hazards and Hazardous Materials*. Similar to the 2004 and 2009 Housing Elements, Alternative B encourages new housing in Downtown, in underutilized commercial and industrial areas, neighborhood commercial districts, and mixed use districts. This could result in construction of housing in areas where hazardous materials are used or were used previously. This impact would be less under Alternative B than under the 2004 and 2009 Housing Elements, due to the reduced density of housing units constructed in these areas. However, as noted for the 2004 and 2009 Housing Elements in *Section V.Q. Hazards and Hazardous Materials*, impacts related to hazardous waste sites are typically project-specific and projects on Brownfield sites would be subject to the review and/or mitigation by the City's SFDPH and/or the applicable regulator of hazardous waste. Specific mitigation measures would be developed in consultation with the SFDPH based on the real or perceived contaminants that may be onsite. Therefore, this impact would be similar to the 2004 and 2009 Housing Elements and would be ***less than significant*** under Alternative B.

Development under Alternative B could result in a localized increase in congestion, which could interfere with an emergency evacuation route, for similar reasons discussed for the 2004 and 2009 Housing Elements under Impact HZ-5 in *Section V.Q. Hazards and Hazardous Materials*. In the event of a natural disaster, increased congestion could slow an evacuation effort within the City. However, the City's ERP, prepared in April 2008, was developed to ensure allocation of and coordination of resources in the event of an emergency in the City. The existing street grid provides ample access for emergency responders and egress for residents and workers. Thus, similar to development under the 2004 and 2009 Housing Elements and the assessment of this issue under Impact HZ-5, development under Alternative B would neither directly nor indirectly alter that situation to any substantial degree and the impact would be ***less than significant.***

Similar to the impacts of the 2004 and 2009 Housing Elements described under Impact HZ-6 in *Section V.Q. Hazards and Hazardous Materials*, Alternative B could result in impacts related to risk associated with fire if new housing is constructed in near areas with potential for wildland fires or if new housing would include certain features that would put residents or workers at risk. San Francisco ensures fire safety primarily through provisions of the San Francisco Building Code and Fire Code. Existing buildings are required to meet standards contained in these codes. All housing constructed under Alternative B, including any high-rise residential buildings, would be required to meet standards for emergency access, sprinkler and other water systems, and other requirements specified in the San Francisco Fire Code. Standards pertaining to equipment access would also be met. Plan review for compliance with San Francisco Fire Code requirements, to be completed by DBI and the SFFD, would minimize fire-related emergency dispatches, reducing the demand for fire protection services in the City. However, this impact would be less under Alternative B compared to under the 2004 and 2009 Housing Element due to the decreased promotion of density in Alternative B. However, for reasons similar to the assessment of the 2004 and 2009 Housing Elements under Impact HZ-6, this impact would be ***less than significant.***

Overall, impacts to hazards and hazardous materials from Alternative B would be reduced from the 2004 and 2009 Housing Elements due to the absence of policies related to density of housing units, and this impact would be ***less than significant***.

Mineral/Energy Resources

The City is not a designated area of significant mineral deposits and no area within the City is designated as a locally-important mineral resource recovery site. Therefore, similar to the 2004 and 2009 Housing Elements there would be ***no impact*** related to the loss of availability of a known mineral resource or the loss of availability of a locally important mineral resource recovery site.

2004 and 2009 Housing Elements Comparison

All new development would be required to comply with the previously discussed federal, state, and local regulations. Similar to the 2004 and 2009 Housing Elements, as assessed under Impact ME-1 in *Section V.R. Mineral and Energy Resources*, projects constructed under Alternative B would be required to comply with applicable federal, state and local regulations including: the Environmental Protection Element of the San Francisco General Plan, San Francisco's Green Building Ordinance, San Francisco Residential Energy Conservation Ordinance, and San Francisco Sustainability Plan. New development would also have the opportunity to participate in voluntary programs, such as GoSolarSF and San Francisco's Green Priority Permitting Program. Therefore, similar to the 2004 and 2009 Housing Elements, Alternative B would have a ***less than significant*** impact with respect to the use of large amounts of fuel, water, or energy.

Agricultural Resources

The entire City is identified as Urban and Built-Up Land by the Department of Conservation and does not contain any important farmland. The City does not participate in the Williamson Act Program and no land within City boundaries is under Williamson Act contract. Therefore, similar to the discussion of the 2004 and 2009 Housing Elements in *Section V.S. Agricultural and Forest Resources*, under Alternative B there would be ***no impact*** related to the direct conversion of Farmland to non-agricultural use, conflict with a Williamson Act contract, or the conversion of Farmland to non-agricultural use due to other changes in the existing environment.

Under Alternative B, there would be no changes to zoning or height and bulk districts. Most of the City's urban forest and timber resources are located in parks or other open space, which would not be at risk for conversion to residential uses under Alternative B. However, Alternative B could result in impacts related to the loss or conversion of forest land if trees in R districts were removed, damaged, or otherwise physically affected by a new project. However, any project proposed under Alternative B would be required to comply with the San Francisco Tree Protection Ordinance and the required replacement ratios to minimize impacts related to forest resources. Therefore, similar to the 2004 and 2009 Housing Elements, there would be ***no impact*** related to forest land and timberland zoning or the loss or conversion of forest land.

2004 and 2009 Housing Elements Comparison

The SFRPD supports and manages a program of 40 community gardens on City-owned property. Community gardens are allowed on SFRPD lands zoned P (public) District and allowed in all R (residential) (RH, RC, RM) Districts. New housing could include projects built to the maximum allowable height and bulk capacity, which could block sun on plots currently used for urban farming or community gardens or otherwise physically affect community gardens. New housing could also result in development of lots currently used for community gardens. Under Alternative B, there would be no changes to zoning or height and bulk districts and therefore, development under Alternative B would present no new conflicts with existing zoning for agricultural uses. Therefore, for reasons similar to those provided under Impact AG-1 in *Section V.S. Agricultural and Forest Resources*, impacts under Alternative B would be similar to the 2004 and 2009 Housing Elements and ***less than significant.***

Attainment of Project Objectives

Alternative B includes the objectives, policies and implementation measures of the 2004 Housing Element minus those policies that were stricken by the trial court in response to the Court of Appeal's decision regarding the environmental review of the 2004 Housing Element. Similar to Alternative A, Alternative B would use the most recently identified RHNA allocation (which would need to be met to comply with State Housing Element Law) and an updated Data and Needs Analysis.

Alternative B focuses on infill and mixed-use development directed toward specific areas, affordable housing, and utilization of City-owned vacant or underused sites. In addition, Alternative B encourages new housing in Downtown and encourages increased housing in neighborhood commercial districts and mixed use districts near Downtown. Since it does not contain the policies from the 2004 Housing Element that encourage increased density in established neighborhoods or reduction in parking (which would increase the ability to provide density and reduce the cost of new housing), the effectiveness of Alternative B at increasing the affordability of the City's housing supply and in turn achieving RHNA goals at all income levels would be reduced compared to the 2004 or 2009 Housing Element.

Alternative B would attain the following project objectives to the same degree as the 2004 Housing Element and the 2009 Housing Element:

- **Provide a vision for the City's housing and growth management through 2014.** Alternative B provides such a vision for the City's future residential development.

- **Maintain the existing housing stock to serve housing needs.** Alternative B contains policies that emphasize retention of the existing housing stock.

- **Encourage housing development where supported by existing or planned infrastructure, while maintaining existing neighborhood character.** Alternative B would direct housing toward Downtown and other portions of the City that have been identified as underused or areas in transition with existing or planned infrastructure, as well as capacity and opportunity

for new housing development and contains several policies designed to ensure that new housing maintains existing neighborhood character.

- **Adoption of a housing element that substantially complies with California State Housing Element law as determined by the California Department of Housing and Community Development.** In 2009 HCD determined that the 2004 Housing Element – Adjudicated would substantially comply with State Housing Element Law at that time. Although Part I of the Housing Element has been updated, and continues to demonstrate that the City has adequate capacity to accommodate the RHNA, it is likely, although not certain, that Alternative B would continue to be found substantially compliant with Housing Element law.

Alternative B would be less effective at attaining the following project objectives than either the 2004 or the 2009 Housing Element:

- **Encourage, develop and maintain programs and policies to meet projected affordable housing needs.** This objective articulates the need to have a Housing Element that maximizes the potential for the City to achieve the housing supply affordability goals established through the RHNA. Increased density and reduced parking requirements are both demonstrated strategies for improving the affordability of new housing and the quantity of housing that can be constructed on a given site, which also impacts housing affordability. While the policies and implementation measures in Alternative B would not preclude the use of such strategies, Alternative B does not promote the use of them to the same degree as the 2004 or 2009 Housing Element, and also does not contain alternative strategies that would be equally effective at achieving affordability..

- **Develop a vision for San Francisco that supports sustainable local, regional and state housing and environmental goals.** Without the emphasis on increased density and reduced parking requirements, Alternative B would not be as effective as either the 2004 or 2009 Housing Element at concentrating new housing along transit corridors, and thereby represents a less sustainable local and regional development model than the 2004 or 2009 Housing Element.

- **Ensure capacity for the development of new housing to meet the RHNA at all income levels.** Part I of the Housing Element would not differ from either the 2004 or the 2009 Housing Element under Alternative B. As Part I demonstrates, the City can accommodate the overall RHNA quantities within the existing zoning designations, so adequate capacity for new housing exists. However, as noted above, Alternative B does not encourage density or reduced parking requirement to the same degree as the 2004 or 2009 Housing Elements, or contain alternative strategies that would be equally effective at achieving affordability, and thus development under Alternative B would not be expected to meet the income categories in the City's RHNA as well as the 2004 or 2009 Housing Element.

Alternative C: 2009 Housing Element–Intensified

Alternative C includes themes and concepts raised during the Draft 2009 Housing Element process but were not included in the proposed 2009 Housing Element. Alternative C themes focus on Transit-Oriented Development, balancing growth with available infrastructure, utilization of City-owned vacant or underused sites, encouraging family-sized housing, comprehensive neighborhood planning to accommodate the need for housing, and public outreach around the housing planning process. Additionally, Alternative C would more aggressively encourage housing integrated into new commercial or institutional projects and housing projects near major transit lines. Alternative C includes the following concepts:

1. Allow for limited expansion of allowable building envelopes for those who provide family-size units in onsite affordable housing;

2. Require development to full allowable building envelope under zoning in locations that are directly on the rapid transit network lines identified in the SFMTA's Transportation Effectiveness Project (TEP), as shown in Figure VII-1;

3. Grant a height and/or density bonus for development that exceeds affordable housing requirements in locations that are directly on the rapid transit network lines identified in the TEP;

4. Grant a height and/or density bonus for 100 percent affordable housing in all zones except in RH-1 and RH-2 zones; and

5. Grant administrative exceptions (i.e., without a hearing by the Zoning Administrator) for required parking spaces if the development is:

    a. In an RH-2 zoning district (or greater);

    b. In an area where additional curb cuts would further exacerbate on-street parking deficits, such as in Residential Parking Program areas; or

    c. On a Transit Preferential Street, as shown in Figure VII-2.

Alternative C would include all policies under the 2009 Housing Element, with the incorporation of policies supporting the above concepts to more aggressively achieve the 2009 Housing Element housing vision, particularly the RHNA income goals.

Land Use

Similar to the 2004 Housing Element and 2009 Housing Element, Alternative C would not include any extensions of roadways or other development features through a currently developed area that could physically divide an established community. Areas for future housing development would occur primarily as infill development or on individual underutilized or vacant parcels, and most future housing

development would take place in established neighborhoods. With respect to division of a community, the policies in Alternative C would be similar to the policies in the 2004 Housing Element and 2009 Housing Element, which encourage additional residential growth in established areas, subject to established land use plans. As with the 2004 and 2009 Housing Elements, under Alternative C there would be ***no impact*** on land use from dividing an established community.

2004 and 2009 Housing Elements Comparison

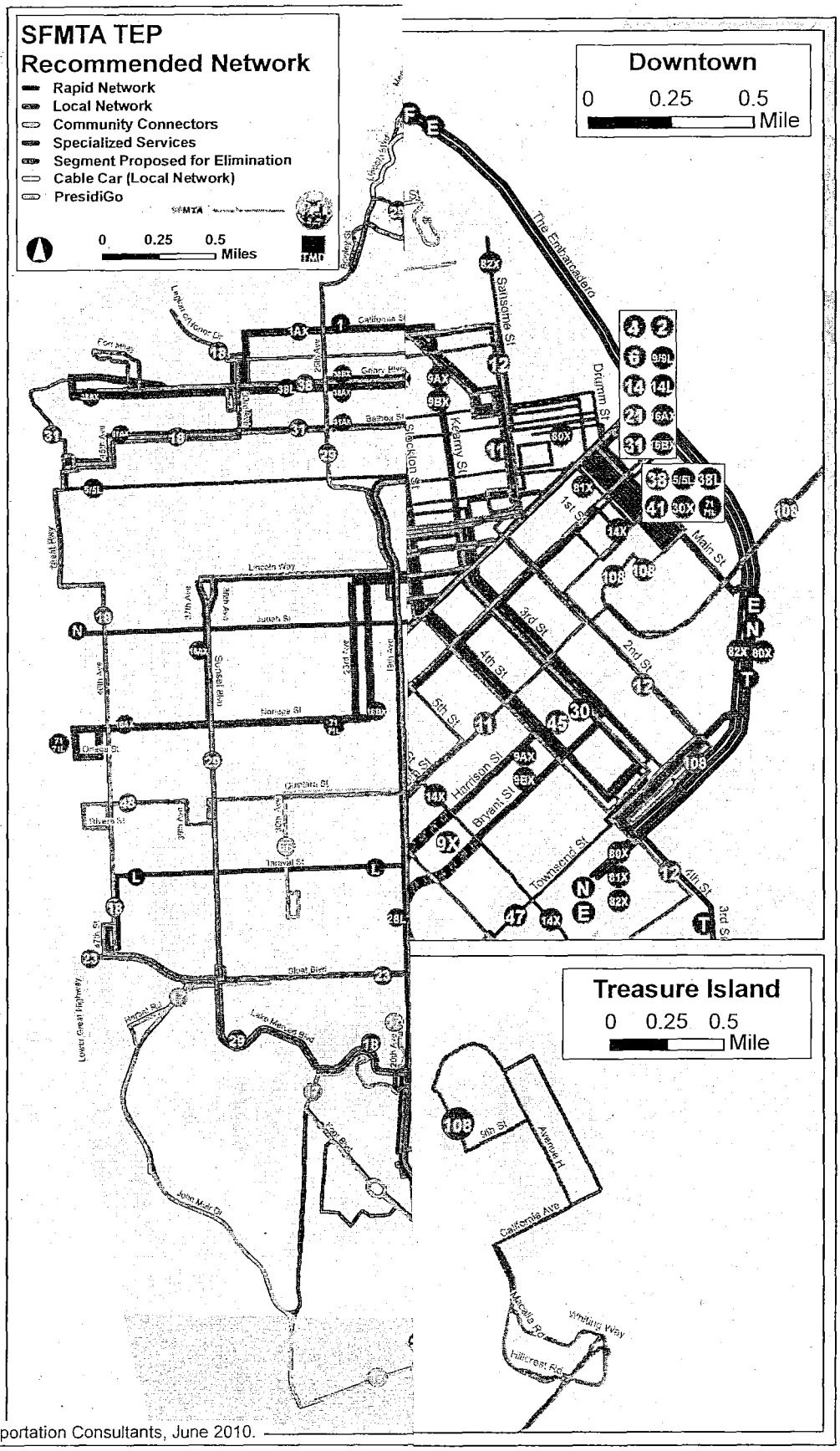
Similar to the 2004 and 2009 Housing Elements, new development under Alternative C would be subject to the controls in existing Area Plans and Redevelopment Plans and would serve to complement – and not conflict with – the policies and land uses in an Area Plan or Redevelopment Plan. Additionally, the policies in Alternative C would not conflict with any regional land use policies, the Regional Transportation Plan, or prevailing local plans, including BCDC policies, San Francisco planning policies (General Plan, Countywide Transportation Plan, MTA Strategic Plan, Bicycle Plan, and Urban Forest Plan) for reasons substantially similar to those discussed in this EIR under Impact LU-1 in *Section V.B, Land Use and Land Use Planning.*

As discussed previously under *Development Assumptions by Alternative*, Alternative C could potentially result in larger buildings and encourage more high-density housing, although the total amount of new housing units would remain within projections. As detailed under Impact LU-2 in *Section V.B. Land Use and Land Use Planning*, the 2004 Housing Element encourages new housing in Downtown, in underutilized commercial and industrial areas, and increased housing in neighborhood commercial districts and mixed use districts near Downtown. In locations where new housing could create land use conflicts, such as formerly industrial areas, the greater density supported by Alternative C could incrementally exacerbate conflicts. Therefore, impacts to land use conflicts and neighborhood character could be incrementally greater under Alternative C than the 2004 and 2009 Housing Elements. However, for reasons similar to those provided in the analysis of the 2004 and 2009 Housing Elements under Impact LU-2, overall these impacts would be ***less than significant.***

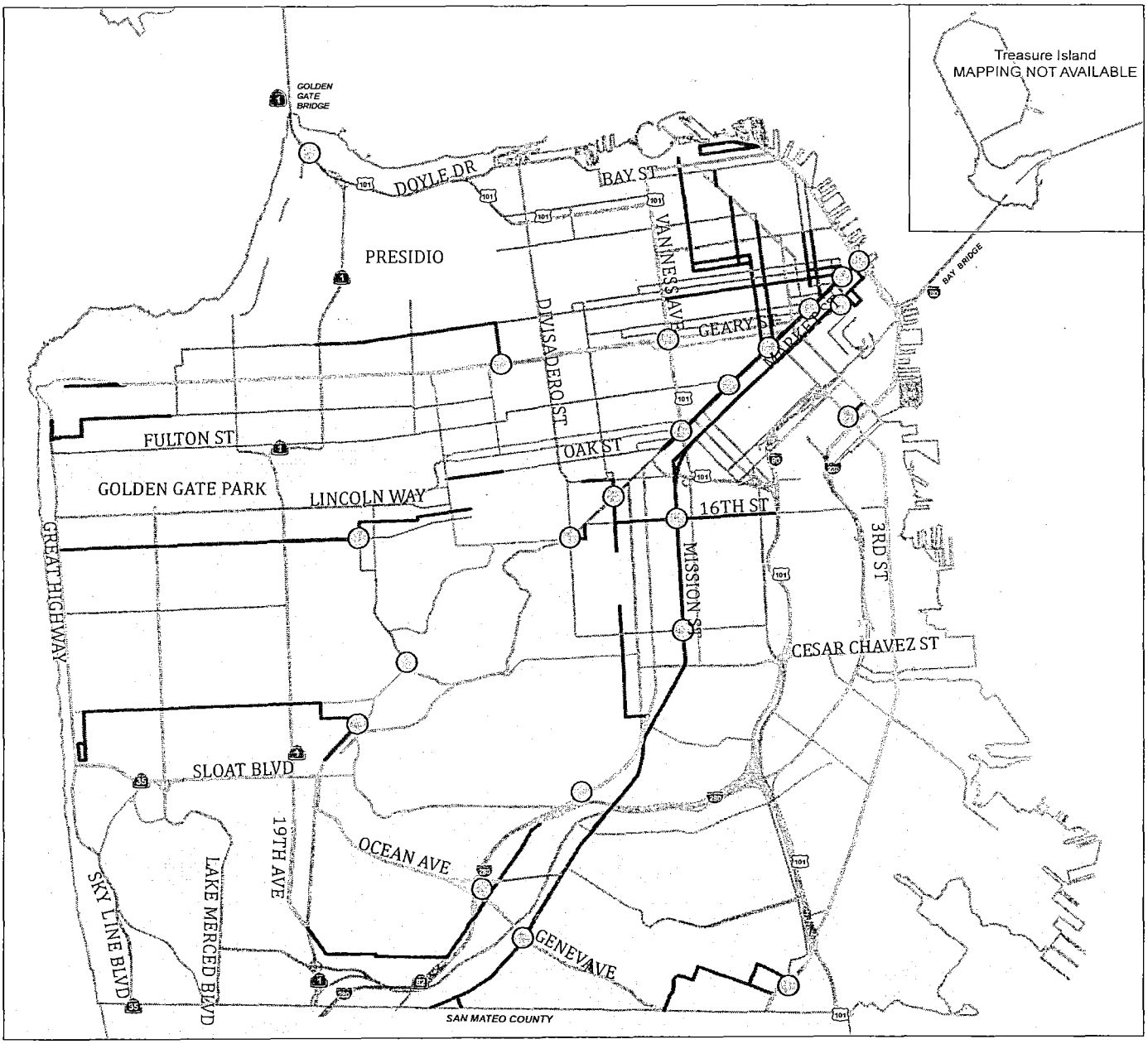
Aesthetics

2004 and 2009 Housing Elements Comparison

As noted in the prior discussion of *Development Assumptions by Alternative*, Alternative C promotes increased density and building mass to a greater extent than the 2004 and 2009 Housing Elements. As a result, taller residential buildings, which accommodate higher densities of residential uses, could be constructed under Alternative C, resulting in incrementally greater potential impacts to scenic vistas, visual resources, and visual character compared to the 2004 and 2009 Housing Elements (assessed under Impacts AE-1, AE-2, and AE-3 in *Section V.C. Aesthetics*). Such impacts could be also increase incrementally under Alternative C, as a result of policies that could increase new development on vacant or undeveloped parcels or redevelopment of underutilized parcels, and which could affect existing natural features (and scenic resources) as compared to the 2004 and 2009 Housing Elements. In addition, under Alternative C, increased density would be promoted, potentially resulting in an increase in impacts



Source: TJKM Transportation Consultants, June 2010.



- Transit Center
- Transit Oriented
- Transit Important
- Secondary Transit Street
- Parks
- Water

NORTH

0 0.5 1 1.5 2

Scale (Miles)

Source: San Francisco General Plan, Transportation Element, Map 9, June 2010.

Figure VII-2
Muni Transit Preferential Streets Network

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associated with light and glare from new sources, addressed under Impact AE-4 for the 2004 and 2009 Housing Elements. While this impact could be incrementally greater than under the 2004 and 2009 Housing Elements, the increase would not be expected to be sufficient to result in a significant impact. Thus, similar to the 2004 and 2009 Housing Elements, this specific impact and overall impacts from Alternative C would be less than significant.

Population and Housing

2004 and 2009 Housing Elements Comparison

As discussed above under *Development Assumptions by Alternative,* housing density under Alternative C would be greater than under the 2004 and 2009 Housing Elements. Therefore, impacts associated with increased density would be greater. However, similar to the 2004 and 2009 Housing Elements, residential development in the City would occur regardless of the policies under Alternative C.

Similar to the 2004 Housing Element, Alternative C encourages housing on public lands and in secondary units, and would promote housing opportunities that would avoid displacement of existing or affordable housing. This impact would be the same as under the 2004 Housing Element. Like Alternative C, the purpose of the 2004 Housing Element is to address housing supply; housing retention; housing condition; housing affordability; housing choice; homelessness; housing density, design, and quality of life; and regional and state housing needs.

Alternative C would not trigger the need for roadway expansions or result in the extension of infrastructure into previously unserved areas, which could induce population growth above that which is projected, for the same reasons discussed under Impact PH-1 in *Section V.D Population and Housing.* Also, similar to the 2004 and 2009 Housing Elements, the policies under Alternative C would not cause a substantial change in the workers-to-household ratio that would occur between 2005 and 2025, and there would be no impact to the City's jobs/housing balance (Impact PH-1). Therefore, for reasons similar to those provided under the assessment of the 2004 and 2009 Housing Elements under Impact PH-1, impacts related to inducing a substantial amount of population growth would remain ***less than significant*** under Alternative C.

Alternative C would not result in substantial impacts related to the displacement of existing housing or creating demand for housing (refer to Impact PH-2), or substantial impacts related to displacement of people (refer to Impact PH-3), for similar reasons provided in the analysis of these issues in *Section V.D. Population and Housing.* As noted in that section, similar to the 2004 and 2009 Housing Elements, compliance with existing planning and building code requirements would minimize the potential to displace housing or people. Further, no additional demand for housing above projected levels would occur as a result of Alternative C. Therefore, similar to the 2004 and 2009 Housing Elements, impacts related to population and housing under Alternative C would be ***less than significant.***

Cultural Resources

2004 and 2009 Housing Elements Comparison

Similar to the 2004 and 2009 Housing Elements, development consistent with Alternative C could result in a substantial adverse change to a historical resource by promoting inappropriate alterations and/or additions, inappropriate new construction, and demolition by neglect. That is, similar to the proposed 2004 and 2009 Housing Elements, Alternative C could result in inappropriate alterations, additions, or new construction that could affect historical or cultural resources. In addition to impacts to individual properties, cumulative impacts could arise in certain areas over the course of time thereby diminishing the historic significance of the area.

However, similar to the 2004 and 2009 Housing Elements, Alternative C would recognize the need to preserve landmark and historic buildings through the development review process and Secretary of Interior Standards for Treatment of Historic Properties. Impacts to landmark and historic buildings could be greater under Alternative C than under the 2004 Housing Element, due to the potential increase in density and intensity of development of residential projects. Overall, the more aggressive housing development policies under Alternative C could encourage denser residential projects with larger buildings; therefore, impacts to historic buildings could be greater than under the 2004 and 2009 Housing Elements. However, the City has well-established review criteria and procedures to evaluate impacts to historic resources at the project level. For this and other similar reasons detailed under Impact CP-1 in *Section V.E. Cultural and Paleontological Resources*, Alternative C would not permit any new development or exempt any future projects from review for impacts to historic resources. Therefore, similar to the 2004 and 2009 Housing Elements, this impact would be ***less than significant.***

For reasons similar to those provided under Impact CP-2 and CP-3 in *Section V.E. Cultural and Paleontological Resources* addressing the 2004 and 2009 Housing Elements, Alternative C could result in a substantial adverse change to an archeological or paleontological resource. That is, impacts to archeological and paleontological resources could result by increasing the potential to require deep foundations or soil improvements, soils disturbance, or directing housing to areas with high potential for archeological deposits near the existing surface as associated with denser, taller buildings. As discussed under Impact CP-2 for both the 2004 and 2009 Housing Elements, the City's established review procedures ensure that any potential to affect archeological resources at the project-level can be addressed and reduced to a less-than significant level. Such procedures would also be applicable under Alternative C. Similarly, potential impacts of the 2004 and 2009 Housing Elements on paleontological resources discussed under Impact CP-3 would be subject to existing regulations, including the National Historic Preservation Act, and would also apply under Alternative C. Therefore, similar to the 2004 and 2009 Housing Elements, impacts of Alternative A on archeological and paleontological resources would be ***less than significant.*** However, Alternative C would result in incrementally greater impacts to archaeological resources as compared to the 2004 and 2009 Housing Elements due to the fact that potentially larger projects would require more excavation.

Similar to the 2004 and 2009 Housing Elements, Alternative C would have the potential to disturb human remains. As discussed under Impact CP-4 in *Section V.E. Cultural and Paleontological Resources*, existing regulations, including Sections 7050.5, 7051, and 7054 of the California Health and Safety Code and Public Resource Code Section 5097.8 would address this impact. Such regulations would also apply under Alternative C. Thus, similar to the 2004 and 2009 Housing Elements, this impact would be ***less than significant*** under Alternative C. However, this impact could be incrementally greater under Alternative C due to the increase in housing units that could potentially be constructed on a per parcel basis. Overall, impacts to cultural resources under Alternative C would be greater to the 2004 and 2009 Housing Elements, although still ***less than significant.***

Transportation and Circulation

2004 and 2009 Housing Elements Comparison

Table VII-3, below, categorizes Alternative C housing development concepts by their potential to: (1) direct growth to particular locations within the city, (2) affect parking, and (3) increase residential density.

Table VII-3
Alternative C Concepts

Housing Concept	Direct Growth	Affect Parking	Increase Residential Density
1. Allow for limited expansion of allowable building envelopes for those who provide family-size units in onsite affordable housing.			X
2. Requirement for development to fully build to the allowable building envelope under zoning in locations that are directly on the Rapid transit network lines identified in the TEP. .	X		X
3. Height and/or density bonus for development that exceeds affordable housing requirements in locations that are directly on the Rapid transit network lines identified in the TEP.	X		X
4. Height and/or density bonus for 100% affordable housing in all zones except in RH-1 and RH-2 zones.	X		X
5. Granting of administrative variances (i.e. over-the-counter) for parking spaces required for additional units if the development is: a. in an RH-2 zoning district (or greater), b. in an area where additional curb cuts would further exacerbate on-street parking supply, such as in Residential Parking Program areas, or c. on a Transit Preferential Street.	X	X	X
Notes: [1] *It is acknowledged that increasing density could affect local parking conditions, however, policies that specifically encourage increased density, yet maintain existing parking requirements, were not determined to have an effect on parking because off-street parking would continue to be supplied as determined by Planning Code requirements.*			

Growth in Certain Areas

Alternative C analyzes additional housing element concepts designed to further encourage attainment of the City's housing needs. With respect to directing growth, Alternative C concepts more aggressively

encourage increased residential development along transit lines and generally throughout the City by allowing administrative parking reductions, and by requiring developers to build to the allowable building envelope. Similar to the 2004 and 2009 Housing Element, Alternative C includes additional policies that would direct growth to certain areas of the City to a greater degree than the 1990 Residence Element. While Alternative C concepts 2 and 3 (above) specifically direct growth along transit lines, concepts 4 and 5 allow growth more generally throughout the City. Concepts 2 and 3 could result in an overall mode shift towards transit by promoting development along transit lines. As discussed in the analysis of the 2004 and 2009 Housing Elements under Impact TR-1 in *Section V.F. Transportation and Circulation*, policies that promote development close to jobs and services and/or along transit lines are intended to reduce citywide vehicle trips by promoting the ability to use alternative modes of transportation, such as transit, bicycling and walking. It is therefore anticipated that under Alternative C, a greater amount of future residential growth would be located along transit lines, potentially reducing citywide vehicle trips from what otherwise would be expected. Because Alternative C could result in a greater amount of trips by alternative modes, it is more likely that some of the 37 intersections anticipated to operate at unacceptable levels of service under future 2025 Cumulative Conditions (refer to Table V.F-1 in *Section V.F. Transportation and Circulation*) would operate at improved, yet still unacceptable levels.

As noted above, Alternative C would promote residential growth in proximity to transit lines more so than the 2004 and 2009 Housing Element. The analysis of the 2004 and 2009 Housing Element under Impact TR-1 found that impacts to transit would be potentially significant because the 2004 and 2009 Housing Elements include policies that could result in a mode shift towards transit. Under 2025 Cumulative Conditions the California Street and Market Street Subway transit corridors are anticipated to operate near Muni's capacity utilization standard of 85 percent. The analysis of the 2004 and 2009 Housing Element policies found that increased transit ridership may exceed Muni's capacity utilization standard and that given SFMTA's current fiscal emergencies, SFMTA may not be able to respond with increased transit service, therefore this impact was found to be potentially significant. Given that Alternative C would include policies that could promote housing in proximity to transit even more so than the 2004 and 2009 Housing Elements, Alternative C would similarly result in a ***significant and unavoidable*** impact to the City's transit system.

Parking Requirements

Similar to the 2004 Housing Element, Alternative C would allow for reduced parking requirements under specified conditions. Compared to the 2009 Housing Element, Alternative C would allow for parking exemptions, while the 2009 Housing Element generally would not. Therefore, Alternative C would fall in between the 2004 and 2009 Housing Element in terms of effects related to parking requirements. As discussed in the TIS, a reduced parking requirement is a strategy to shift modes of transportation to transit, bicycling or walking. It is therefore anticipated that Alternative C could result in a greater portion of future residential trips shifting to alternative transportation modes based on reduced parking requirements than the 2009 Housing Element, and to a similar degree as the 2004 Housing Element policies. Any shift in transportation modes from vehicles to transit, bicycling or walking would be consistent with the City's Transit First Policy. However, as discussed above, any shift in transportation modes to transit could result in potentially significant impacts to the City's transit system under 2025

Cumulative Conditions. Therefore, transit impacts resulting from Alternative C could remain ***significant and unavoidable.***

Residential Density Provisions

Alternative C is intended to encourage greater attainment of new residential units to meet the City's housing needs at all income levels. Specifically, Alternative C, concepts 1-5 (above) are designed to result in increased residential density as compared to the 2004 and 2009 Housing Elements. As discussed in the TIS, increased residential density is correlated with reduced auto ownership and reduced VMT, resulting in overall beneficial impacts to the City transportation network. Therefore, Alternative C would result in greater beneficial impacts to the City roadway network than the 2004 and 2009 Housing Elements. However, as discussed above, any subsequent shift to transit could result in ridership that exceeds Muni's capacity utilization standard under 2025 Cumulative Conditions. Therefore, transit impacts resulting from Alternative C's density provisions would remain ***significant and unavoidable.***

Conclusion

Alternative C does not propose any new residential development, and would therefore, not generate any new person trips. In addition, Alternative C can be expected to result in an overall decrease in citywide vehicle trips as compared to the 2004 and 2009 Housing Elements because Alternative C generally encourages greater residential density throughout the City, reduced parking requirements, and increased density along transit lines as compared to the 2004 and 2009 Housing Elements. Therefore, the effects of future development on the roadway network would not be expected to exceed 2025 Cumulative Conditions.

Alternative C contains more aggressive policies that could encourage a greater shift towards alternative transportation, including transit. Therefore, similar to the 2004 and 2009 Housing Element, Alternative C could result in increased ridership that may exceed available transit capacity under 2025 Cumulative Conditions, resulting in ***significant and unavoidable*** impact to the City's transit system. Similar to the 2004 and 2009 Housing Elements, Alternative C would have no impact on citywide pedestrian or bicycle facilities, loading areas, emergency vehicle access, or impacts from construction for the same reasons as discussed in the analysis of the 2004 and 2009 Housing Elements under Impact TR-1 in *Section V.F. Transportation and Circulation.*

Noise

2004 and 2009 Housing Elements Comparison

Similar to the 2004 Housing Element and 2009 Housing Element, the City is neither within an airport land use plan area, nor within two miles of a public airport or public use airport, nor within the vicinity of a private airstrip. Therefore, Alternative C would have ***no impact*** with respect to airport noise.

Incentives provided under Alternative C would promote new housing development and, therefore, a temporary increase in noise-generating activity associated with construction. However, similar to the

analysis of the 2004 and 2009 Housing Elements under Impact NO-1 in *Section V.G. Noise*, temporary noise impacts from new housing construction would be subject to compliance with the City's noise ordinance, and the impact under Alternative C would remain ***less than significant.*** However, although less than significant, this impact could be incrementally greater than under the 2004 and 2009 Housing Elements due to the policies that promote increased density and intensity of residential development.

Alternative C and the 2004 and 2009 Housing Elements recognize the need for the retention and maintenance of existing housing, and therefore do not represent a shift in policy. Therefore, similar to the 2004 Housing Element, construction impacts from exposure of people to or generation of excessive groundborne vibration or groundborne noise from demolition would be less than significant under Alternative C, for the same reasons provided under Impact NO-2 in *Section V.G. Noise* for the 2004 and 2009 Housing Elements.

Alternative C and the 2004 and 2009 Housing Elements include policies that direct growth to certain areas of the City and policies that promote increased density. Regardless, impacts related to a substantial permanent increase in ambient noise levels would be ***less than significant*** under Alternative C for reasons similar to those provided in the analysis of the 2004 and 2009 Housing Elements under Impact NO-3 in *Section V.G Noise*. Namely, all new residential development would be subject to compliance with existing laws and regulations applicable to this issue, resulting in a less than significant impact.

Alternative C could promote the placement of housing in industrial and commercial areas and along transit lines and could increase housing density, housing construction, and housing in non-residential areas compared to the 2004 and 2009 Housing Elements, resulting in the exposure of people to more noise. Because Alternative C could result in the potential for exposing residents to higher noise levels associated with non-residential uses, noise impacts under Alternative C could be incrementally greater than the 2004 and 2009 Housing Elements due to the anticipated increase in housing density. As noted in the analysis of the 2004 and 2009 Housing Elements under Impact NO-4, compliance with Title 24 may not mitigate exterior noise on private open space or other site-specific conditions may warrant acoustical monitoring and analysis beyond that required for Title 24 compliance. Therefore, as with the 2004 and 2009 Housing Elements, Alternative C would result in a significant impact with respect to exposing noise sensitive receptors to noise levels in excess of established standards and promoting residential development that may be substantially affected by existing noise levels. Compliance with Mitigation Measure M-NO-1: Interior and Exterior Noise, in *Section V.G. Noise* would reduce Alternative C's impact on noise sensitive receptors to ***less than significant with mitigation***, similar to the 2004 and 2009 Housing Elements. Overall, these impacts under Alternative C could be greater than noise impacts under the 2004 and 2009 Housing Elements, but would remain ***less than significant with mitigation.***

Air Quality

As discussed under Impact AQ-1 in *Section V.H. Air Quality*, consistency of the proposed Housing Elements with regional air quality plans can be determined by comparing the growth factors used to generate the City's RHNA allocation with those used in the most recently adopted regional air quality plan, the Bay Area 2005 Ozone Strategy. The 2005 Ozone Strategy growth assumptions for Bay Area communities are based on ABAG's Projections. The Housing Elements are based on the Regional Housing Needs Allocation (RHNA) evaluation. This RHNA, in turn, is based on ABAG population projects. As both the 2004 and 2009Housing Elements and the 2005 Ozone Strategy utilize ABAG projections, the2004 and 2009 Housing Elements would not result in a significant impact on regional air quality planning efforts. For reasons similar to those detailed under Impact AQ-1, Alternative C would result in a ***less than significant*** impact on regional air quality planning efforts.

Although the 2004 and 2009 Housing Elements would not directly result in the construction of residential units, 2004 and 2009 Housing Elements policies could indirectly contribute to an existing or projected air quality violation by promoting increased density in certain areas of the City, thereby consolidating new construction within those areas. The policies in Alternative C would promote increased density over the 2004 and 2009 Housing Elements. The increased density standards compared to the 2004 and 2009 Housing Elements could promote longer construction durations associated with construction of buildings containing a greater number of units, which could result in an increase in construction emissions. Therefore, impacts from construction emissions could be incrementally greater under Alternative C. However, for reasons similar to those provided under Impact AQ-2 in *Section V.H. Air Quality* assessing air quality standards and the 2004 and 2009 Housing Elements, construction impacts under Alternative C would remain ***less than significant.***

However, because Alternative C would encourage more housing units and larger buildings near transit than either the 2004 or 2009 Housing Elements, it could therefore incrementally reduce impacts to air quality, including reduced CO concentrations due to a decrease in Vehicle Miles Traveled.

Similar to the 2004 or 2009 Housing Elements, Alternative C would not expose residents to TACs, for reasons similar to those provided under Impact AQ-3 in *Section V.H. Air Quality*. Namely, all future housing units would be required to undergo environmental review which would include consideration of the location of industrial sites or other sources of air pollution in the design of the residential building, to orient air intakes away from the sources of pollution. Furthermore, the Potential Roadway Exposure Zone Map, codified in Article 38 of the Health Code, provides a buffer around significant TRP emission sources using $PM_{2.5}$ as a proxy for TRP exposures. Policies contained in the Air Quality Element and Transportation Element of the General Plan, as well as rules codified in Article 38 of the Health Code, would reduce the air quality impacts of Alternative C, same as the 2004 and 2009 Housing Elements (see Impact AQ-3), with respect to directing the development housing potentially located near sources of air pollution. Therefore, for this and similar reasons provided under Impact AQ-3 addressing exposure of sensitive receptors to substantial pollutants, the impact under Alternative C would remain ***less than significant.***

Similar to the 2004 and 2009 Housing Elements (see Impact AQ-4 in *Section V.H. Air Quality*), Alternative C guides the construction of housing and would not result in the creation of objectionable orders. Overall, impacts to air quality under Alternative C would be incrementally reduced than under the 2004 and 2009 Housing Elements due to potential decreases in Vehicle Miles Traveled. However, this impact would still be ***less than significant.***

Greenhouse Gases

2004 Housing Element Comparison

Both Alternative C and the 2004 Housing Element include policies that would ultimately result in reduced GHG emissions per capita by encouraging: (1) housing in proximity to job cores, neighborhood services, and/or transit; (2) increased housing density; (3) infill development; (4) preservation of existing housing stock; and (5) energy efficiency. However, Alternative C would encourage a greater number of larger buildings, which would therefore result in more energy savings than the 2004 Housing Element because increased density provides better insulating qualities and other efficiencies. Given that Alternative C would reduce energy use (and resulting GHG emissions) on a per capita basis more than the 2004 Housing Element, this impact (see Impact GH-1 in *Section V.I. Greenhouse Gas Emissions*) would be incrementally less than under the 2004 Housing Element and remain ***less than significant.***

2009 Housing Element Comparison

Both Alternative C and the 2009 Housing Element include policies that would ultimately result in reduced per capita GHG emissions. Such policies include the 2009 Housing Element Policies (see Table IV-8) plus Alternative C concepts (see Table VII-1) that provide housing: (1) in proximity to job cores, neighborhood services, and/or transit; (2) by increasing housing density; (3) by encouraging infill development; (4) through preservation of existing housing stock or adaptive reuse of existing buildings; and (5) through policies promoting energy efficiency. Each of these strategies could result in reduced growth of GHG emissions for the same reasons discussed under Impact GH-1 in *Section V.I. Greenhouse Gas Emissions*. However, Alternative C would promote a greater number of larger buildings, as compared to the 2009 Housing Element. Both Alternative C and the 2009 Housing Element include policies that promote infill development, preservation the City's existing housing stock, and energy efficiency of new development, although Alternative C would do so to a greater extent. Therefore, overall impacts from Alternative C would be incrementally less than the 2009 Housing Element. However, the impact (see Impact GH-1 under *Section V.I. Greenhouse Gas Emissions*) of GHG emissions under Alternative C would still be ***less than significant.***

Wind and Shadow

2004 and 2009 Housing Elements Comparison

As noted above under *Development Assumptions by Alternative,* Alternative C promotes increased density and, in certain areas, building heights compared to the 2004 and 2009 Housing Elements. Taller buildings

have the potential to increase ground-level wind acceleration, thereby resulting in possible wind impacts. However, any increased building heights attributable to Alternative C would not be expected to be sufficient to exceed the City's wind hazard criterion level; wind impacts are project-specific, and all new residential projects would be subject to the Planning Department's procedures requiring modification of any new building or addition that exceeds the wind hazard criterion. New residential units would comply with federal, state, and local regulations including Sections 147, 148, 243(c)(9), 249.1(b)(2), and 263.11(c) of the San Francisco Planning Code, discussed in *Section V.J. Wind and Shadow*. For reasons similar to those noted under Impact WS-1 (i.e., compliance with regulations noted above), wind impacts under Alternative C would not be substantial. Therefore, this impact would be the same as the 2004 and 2009 Housing Elements and would have a ***less than significant*** impact with respect to the alteration of wind patterns.

Because Alternative C promotes some increased building heights compared to the 2004 and 2009 Housing Elements, an incremental increase in the potential for shading of parks or other protected locations could occur. This could result in a significant shadow impacts that would not otherwise occur. However, these impacts would be reduced or avoided as a result of the City review efforts. Specifically, because shadow impacts are project-specific, all applications for new construction or additions to existing buildings above 40 feet in height are reviewed by the Planning Department to determine whether such shading might occur, and if a project would result in new shadow, that shadow is evaluated for significance under CEQA. Furthermore, new residential units would comply with the federal, state, and local regulations discussed in *Section V.J. Wind and Shadow*, including Sections 146(a), 146(c), and 295 of the San Francisco Planning Code. Potential shadow impacts under Alternative C would be subject to the same processes and requirements as those noted in Impact WS-2 for the 2004 and 2009 Housing Elements. Therefore, this impact would be the same as the 2004 and 2009 Housing Elements and would be ***less than significant*** with respect to the creation of new shadows.

Recreation

2004 and 2009 Housing Elements Comparison

Similar to the 2004 Housing Element and 2009 Housing Element, Alternative C would not directly increase the use of recreational facilities because it would not directly result in population growth or generate new development. However, as noted in *Section V.K. Recreation*, both the 2004 and 2009 Housing Elements would have the potential for secondary effects on recreational facilities resulting from promoting new housing in certain areas and subsequently resulting in physical deterioration of existing recreational facilities. The City currently has a ratio of 7.0 acres of open space per 1,000 San Francisco residents and the City has not established a citywide target ratio of parkland to residents, nor has it adopted a Quimby Act ordinance. Many open space acquisitions/expansions have been identified by the Planning Department and San Francisco Recreation and Park Department, independent of Alternative C and the proposed Housing Elements. Furthermore, SFRPD would continue to acquire new open space/recreation facilities pursuant to Proposition C. New housing development would be required to comply with Planning Code requirements for open space.

Similar to the analysis provided under Impact RE-1 in *Section V.K. Recreation*, implementation of Alternative C could result in impacts related to an adverse physical effect on the environment due to the construction or expansion of recreational facilities in underserved areas, potentially requiring new or expanded facilities. Alternative C would more aggressively promote increased density and direct growth to certain areas of the City, including on transit lines. Alternative C would also encourage family-sized units (i.e., two or more bedrooms), resulting in increased use of some types of facilities. Similar to the analysis provided under Impact RE-2, the increased promotion of density and direction of growth to certain areas could increase the potential for greater use of certain public recreation facilities, accelerating deterioration or creating the need for new facilities. Such impacts under Alternative C could be incrementally greater than under the 2004 and 2009 Housing Elements. However, for reasons similar to those provided in the analysis of the 2004 and 2009 Housing Elements under Impact RE-1 and Impact RE-2 in *Section V.K. Recreation*, this impact would be ***less than significant.***

Utilities and Service Systems

2004 and 2009 Housing Elements Comparison

Although the 2004 Housing Element and 2009 Housing Element would not result directly in the construction of residential units, as discussed under Impact UT-1 in *Section V.L. Utilities and Service Systems*, all new development would be required to comply with all provisions of the NPDES program, as enforced by the RWQCB. Any construction that could occur under the proposed Housing Elements would be within treatment/service projections and would not result in an exceedance of wastewater treatment requirements. Additionally, the NPDES Phase I and Phase II requirements would regulate discharge from construction sites. All new development would be required to comply with all applicable wastewater discharge requirements issued by the State Water Resources Control Board (SWRCB) and RWQCB. Therefore, for reasons similar to those provided under Impact UT-1 assessing the 2004 and 2009 Housing Element, Alternative C would have a ***less than significant*** impact with respect to the exceeding of wastewater treatment requirements.

As discussed under *Section V.L. Utilities and Service Systems*, in accordance with AB 939, all cities and counties in California are required to divert 25 percent of all solid waste to recycling facilities from landfill or transformation facilities by January 1, 1995, and 50 percent by January 1, 2000. As of 2006, the most recent year for which Board-reviewed rates are available, the City achieved a diversion rate of 70 percent. Therefore, similar to the 2004 and 2009 Housing Element, Alternative C would have ***no impact*** related to compliance with solid waste statutes and regulations.

As discussed in the assessment of impacts from new or expanded water or wastewater facilities under Impact UT-2 in *Section V.L. Utilities and Service Systems*, new housing construction in industrial and commercial areas could result in an inadequate type and level of wastewater service capacity due to the introduction of new land uses. Alternative C would result in larger buildings, which could create greater density, potentially resulting in a greater number of people requiring water or wastewater treatment service as compared to the 2004 Housing Element and 2009 Housing Element. However, as noted under Impact UT-2, similar to the 2004 Housing Element and 2009 Housing Element, new development under

Alternative C would be required to comply with federal, state, and local regulations, including Article 4.1 of the San Francisco Public Works Code and the City's industrial waste pretreatment program to regulate the discharge of pollutants into the sewage system, Water Quality Protection Program, the City's Stormwater Management Plan, the City's Construction Site Runoff Pollution Prevention Program requirements, and forthcoming SFPUC development and redevelopment guidelines. Therefore, for reasons similar to those provided under Impact UT-2, impacts to wastewater service capacity from Alternative C would remain less than significant. However, while such impacts would be similar, they could be incrementally greater under Alternative C than the 2004 Housing Element and 2009 Housing Element due to the increased density of housing units.

Construction associated with housing could potentially result in an increase of impervious surfaces on sites that could increase the rate of runoff, exceeding the capacity of stormwater drainage facilities, as discussed under Impact UT-3 in *Section V.L. Utilities and Service Systems*. This increase in impervious surfaces could be greater than under the 2004 Housing Element and 2009 Housing Element due to the requirements to build out to the maximum building envelope; therefore, this impact could be incrementally increased. Regardless, all new residential development would be required to comply with federal, state, and local regulations, including the City's Green Building Ordinance, and the Green Landscaping Ordinance. Therefore, similar to the impacts from impervious surfaces from the 2004 and 2009 Housing Elements assessed under Impact UT-3, Alternative C impacts would be ***less than significant***, but incrementally greater than the 2004 and 2009 Housing Elements due to the increased density of housing units.

This EIR considers the degree to which construction of housing could potentially result in the need for new or expanded water supply resources or entitlements because increased density could result in inadequate water supply. However, as noted in the assessment of the 2004 and 2009 Housing Elements under Impact UT-4 in *Section V.L. Utilities and Service Systems*, all new development would be required to comply with federal, state, and local regulations, including the City's Green Building Ordinance, Water Supply Availability Study, North Basin Groundwater Management Plan, WSIP, Article 21 of the San Francisco Public Works Code, and the Residential Water Conservation Ordinance. As these would also apply to new housing developed under Alternative C, impacts related to water supply would be similar to the 2004 Housing Element and 2009 Housing Element, and the impact would be ***less than significant***.

New housing constructed under Alternative C would require solid waste disposal. As discussed under Impact UT-5, similar to the 2004 Housing Element and 2009 Housing Element, additional collection trucks and personnel could be required to provide solid waste services to new housing. However, all new development would be required to comply with the previously discussed state and local regulations, including the City's Green Building Ordinance, Ordinance No. 27-06, and the Mandatory Recycling and Composting Ordinance (all of which contribute to the City's goal of zero waste by 2020). Therefore, for the same reasons provided under Impact UT-5, impacts to solid waste disposal from Alternative C ***less than significant***, although incrementally greater than the 2004 Housing Element and 2009 Housing Element due to the increased density of housing units for which recycling and composting is expected to be more challenging.

Public Services

2004 and 2009 Housing Elements Comparison

As under all the other Alternatives, San Francisco's population is expected to grow, thus potentially resulting in an increase in the number of people requiring fire protection or police services by 2014or a change in the level of service required. As discussed in Impact PS-2, none of the analyzed Housing Elements would increase the City's overall population; rather the Housing Elements provide direction for where increased residential units should be developed. As the City grows, the service areas for public services including police, fire and health care facilities would be reevaluated and resources would be reallocated to accommodate the needs in specific parts of the City, if and when conditions warrant. New development would be required to comply with current seismic and life safety requirements of the San Francisco Building and Fire Code. Therefore, for reasons discussed in Impact PS-1, PS-2 and PS-5, impacts to police, fire and health care facilities under Alternative C would be similar to the 2004 and 2009 Housing Elements and would be ***less than significant.***

As discussed under Impact PS-3, residential development is assessed a development fee on a per square foot basis for school facilities. Therefore, for the reasons discussed in Impact PS-3, Alternative C would similarly result in a ***less than significant*** impact to school facilities. Lastly, as explained in PS-4, with regards to library facilities, the SFPL does not anticipate its facilities to reach capacity within the horizon year of this EIR and responds to increased population in certain areas by increasing service hours. Therefore, for the reasons described in PS-4, Alternative C would similarly result in ***less than significant*** impacts to library services.

Biological Resources

2004 and 2009 Housing Elements Comparison

Similar to the impacts detailed in *Section V.N. Biological Resources* for the 2004 and 2009 Housing Elements, Alternative C could result in impacts related to biological resources if new projects result in disturbance from construction activities, tree removal, construction on or near wetlands or sensitive habitats or riparian areas, interference with migration, take of special status-species (e.g., development/redevelopment of abandoned buildings that provide habitat for bats could impact those species), application of pesticides and herbicides, construction of tall buildings with glass walls that could increase bird strikes and possibly interrupt a migration corridor, or conflict with provisions of an adopted habitat conservation plan.

These impacts could be incrementally increased under Alternative C due to the increased promotion of density from development of larger buildings and/or more sites. However, all housing constructed under Alternative C would be required to comply with the Open Space Element of the San Francisco General Plan, Chapter 8 of the San Francisco Environment Code, San Francisco's Green Building Ordinance, San Francisco's IPM Ordinance, San Francisco's Urban Forest Plan, and San Francisco's Urban Forestry Ordinance, which would reduce impacts related to biological resources. Therefore, while overall impacts

to biological resources under Alternative C could be incrementally greater than under the 2004 and 2009 Housing Elements, for reasons similar to the those provided in the analysis of the 2004 and 2009 Housing Elements under Impact BI-1, impacts would be ***less than significant.***

Geology and Soils

2004 and 2009 Housing Elements Comparison

The San Francisco Bay Area and surrounding areas are characterized by numerous geologically young faults. However, there are no known fault zones or designated Alquist-Priolo Earthquake Fault Zones in the City. Therefore, similar to the 2004 and 2009 Housing Elements, there would be ***no impact*** with respect to rupture of a known earthquake fault under Alternative C. Additionally, development under Alternative A would not involve the use of septic tanks or alternative wastewater disposal systems. Therefore, similar to the 2004 and 2009 Housing Elements, there would be ***no impact*** with respect to septic tanks or alternative wastewater disposal systems under Alternative C.

Similar to the 2004 and 2009 Housing Elements, new development under Alternative C could expose people and structures to geologic risks, including from rupture of a known earthquake fault, groundshaking, ground failure, or liquefaction. Additionally, housing development could be located on expansive or unstable ground, or on or near an earthquake fault, or areas prone to landslides. New housing could also increase density in especially geologically hazardous areas or for housing units not constructed or maintained in a seismically sound manner. In addition, increasing density could result in heavier buildings, which could increase the weight on soil beyond what it has previously experienced. Such impacts resulting from the 2004 Housing Element are detailed under Impact GE-1 (seismic risks) and Impact GE-3 (unstable soils) in *Section V.O. Geology and Soils*. However, as noted in that analysis, federal, state, and local regulations have been adopted to reduce impacts from seismic hazards. These regulations include the San Francisco Building Code (SFBC), Earthquake Hazards Reduction Act, Alquist-Priolo Earthquake Fault Zoning Act, and Seismic Hazards Mapping Act of 1990. Therefore, for reasons similar to those provided under Impact GE-1 and Impact GE-3 for the 2004 and 2009 Housing Elements, impacts under Alternative C would remain ***less than significant.***

Housing construction under Alternative C could result in soil erosion through the need for grading activities. As noted under the assessment of this issue from the 2004 and 2009 Housing Element under Impact GE-2, all new development would be required to comply with regulations, including State and City Building Codes that include regulations that have been adopted to reduce impacts from grading and erosion. Thus, similar to the 2004 and 2009 Housing Elements, impacts related to soil erosion under Alternative C would be ***less than significant.***

As noted under Impact GE-4, the State of California provides minimum standards for building design through the CBC, including standards that must be met for construction on expansive soils. This impact would be increased under Alternative C due to the increased promotion of density (potentially heavier buildings on expansive soils). However, for reasons similar to those provided in the assessment of

expansive soils impacts for the 2004 and 2009 Housing Element under Impact GE-4, the impacts of Alternative C would be ***less than significant.***

Similar to the 2004 and 2009 Housing Elements, residential development policies of Alternative C could require grading activities that have the potential to substantially change the topography or any unique geologic or physical features on project sites. However, as noted under the assessment of the 2004 and 2009 Housing Elements under Impact GE-5, grading impacts are project-specific and all grading and building permit applications for new construction or additions to existing buildings would be reviewed by the Planning Department to determine whether grading activities might occur with the potential to substantially change the topography of a project site. Furthermore, as part of the permitting process, construction activities for new residential units would be required to comply with the Building Code related to grading and excavation activities and project design plans would be subject to review by the City's Planning Department for consistency with policies related to land alteration. This impact would be increased under Alternative C due to the increased promotion of density. However, for reasons similar those provided under the analysis of the 2004 and 2009 Housing Elements under Impact GE-5, this impact under Alternative C would be ***less than significant.*** Overall, impacts to geology and soils from Alternative C would be similar to the 2004 and 2009 Housing Elements and ***less than significant.***

Hydrology and Water Quality

2004 and 2009 Housing Elements Comparison

The following discussion evaluates the potential hydrology and water quality impacts of Alternative C compared to the proposed Housing Elements. However, as noted in the discussion of water quality standards under Impact HY-1 *in Section V.P. Hydrology and Water Quality*, while housing element policy would not by itself result in the construction of new housing, policies that promote how and where housing is developed could result in impacts related to water quality standards, waste discharge requirements, or otherwise degrade water quality. Regardless, all new housing would be subject to compliance with existing regulations that serve to limit such impacts, including Article 4.1 of the San Francisco Public Works Code and the City's industrial waste pretreatment program to regulate the discharge of pollutants into the sewage system, and Water Quality Protection Program. Therefore, for reasons similar to those provided under Impact HY-1, this impact would remain ***less than significant*** under Alternative C.

Similar to the discussion of the 2004 and 2009 Housing Elements under Impact HY-3 and Impact HY-4, Alternative C could potentially alter existing drainage patterns through grading and construction activities. This impact could be incrementally increased in comparison to the 2004 and 2009 Housing Elements due to the increased density of housing units that might be constructed under Alternative C (increased density may result in heavier buildings that require more robust foundations and result in more grading/construction related impacts). However, similar to the 2004 and 2009 Housing Elements, development under Alternative C would be required to comply with the previously discussed federal, state, and local regulations, including Article 4.1 of the San Francisco Public Works Code and the City's industrial waste pretreatment program to regulate the discharge of pollutants into the sewage system,

Water Quality Protection Program, the City's Stormwater Management Plan, the City's Construction Site Runoff Pollution Prevention Program requirements that are described in the City's Construction Site Water Pollution Prevention Program, and forthcoming SFPUC development and redevelopment guidelines. Therefore, for reasons similar to those provided for the analysis of the 2004 and 2009 Housing Elements under *Section V.P. Hydrology and Water Quality*, impacts with respect to the rate, volume, or quality of runoff would be ***less than significant*** under Alternative C.

Alternative C would also result in construction of new housing could require dewatering or result in groundwater drawdown. Similar to the discussion of the 2004 and 2009 Housing Elements under Impact HY-2 in *Section V.P. Hydrology and Water Quality*, although short-term construction groundwater dewatering may be necessary at certain locations (e.g., for installation of building foundations or underground utilities), dewatering would have only a minor temporary effect on the groundwater table elevation in the immediate vicinity of the activity, and would not measurably affect groundwater supplies. For the same reasons, this impact under Alternative C would be similar to the 2004 and 2009 Housing Elements and would remain ***less than significant.***

Similar to the discussion of the 2004 and 2009 Housing Elements under Impact HY-5, Alternative C could result in the construction of housing in 100-year flood hazard areas that would be subject to or could impede or redirect flood flows. However, for reasons similar to the analysis of the 2004 and 2009 Housing Elements under Impact HY-5 (e.g., all new development would be required to comply with federal, state, and local regulations) impacts under Alternative C would remain ***less than significant.***

Additionally, new construction could result in impacts related to flooding if housing is placed near aboveground reservoirs and tanks. This impact would be no different under Alternative C than under the 2004 and 2009 Housing Elements. Therefore, impacts under Alternative C from dam inundation would be similar to those detailed under Impact HY-6 for the 2004 and 2009 Housing Elements, and would be ***less than significant.***

New construction under Alternative C could result in impacts related to seiche, tsunami, or mudflow if housing is placed near open water, near bodies of water, or near steep slopes in the City. This impact is detailed under Impact HY-7 in *Section V.P. Hydrology and Water Quality.* Similar to the 2004 and 2009 Housing Elements, all new development would be required to comply with applicable federal, state, and local regulations, including the Department of Building Inspection's approval of the final plans for any specific development; therefore, similar to the 2004 and 2009 Housing Elements assessed under Impact HY-7, this impact would be ***less than significant*** under Alternative C. Overall, impacts to hydrology and water quality from Alternative C, although increased over the 2004 and 2009 Housing Elements due to the increased promotion of density, would remain ***less than significant.***

Hazards/Hazardous Materials

The City is neither within an airport land use plan area, nor within two miles of a public airport or public use airport, nor within the vicinity of a private airstrip. Therefore, similar to the 2004 Housing Element or

2009 Housing Element, development under Alternative C would have ***no impact*** with respect to air safety.

2004 and 2009 Housing Elements Comparison

Similar to the 2004 and 2009 Housing Elements, Alternative C would promote increased density of housing construction, potentially resulting in the increased transport, use, or disposal of hazardous materials and impacts related to the potential for hazardous materials upset or accident conditions. Similar to the 2004 Housing Element, Alternative C encourages new housing in Downtown, in underutilized commercial and industrial areas, neighborhood commercial districts, and mixed use districts. Additionally, similar to the 2009 Housing Element, Alternative C encourages new housing in commercial and institutional areas and near major transit lines. This could result in construction of housing in areas where hazardous materials are used. However, all new development would be required to comply with federal, state, and local regulations, including the EOP, Hazard Mitigation Plan, San Francisco Public Works Code, All-Hazards Strategic Plan, and San Francisco Public Health Code. Additionally, Alternative C could result in incrementally increased impacts from hazardous materials in comparison to the 2004 and 2009 Housing Elements, if more sites containing hazardous materials are developed under Alternative C policies. However, similar to the 2004 and 2009 Housing Elements assessment provided under impact HZ-1 in *Section V.Q. Hazards and Hazardous Materials*, impacts of Alternative C with respect to the routine transport, use, or disposal of hazardous materials from would be less than significant.

Development under Alternative C could result in impacts related to the risk of upset and accident conditions involving hazardous materials (Impact HZ-2) because new housing construction could increase the amount of transport of hazardous materials for delivery and disposal purposes, which could in turn increase the risk of upset and accident conditions during transport. The assessment for this issue for the 2004 and 2009 Housing Elements is provided under Impact HZ-2 in *Section V.Q. Hazards and Hazardous Materials*. All new housing development would be required to comply with all applicable federal, state, and local regulations, including the EOP, Hazard Mitigation Plan, San Francisco Public Works Code, All-Hazards Strategic Plan, and San Francisco Public Health Code. Therefore, this impact under Alternative C would remain ***less than significant*** compared to the 2004 and 2009 Housing Elements, for reasons similar to those provided under Impact HZ-2.

Under Alternative C, housing construction could occur on sites that have been identified as being contaminated from the release of hazardous substances in the soil, including industrial sites, sites containing leaking underground storage tanks, and large and small-quantity generators of hazardous waste. The assessment of this issue is provided under Impact HZ-3 and Impact HZ-4 in *Section V.Q. Hazards and Hazardous Materials*. Similar to the 2004 Housing Element, Alternative C encourages new housing in Downtown, in underutilized commercial and industrial areas, neighborhood commercial districts, and mixed use districts. This could result in construction of housing in areas where hazardous materials are used. This impact would be greater under Alternative C than under the 2004 Housing Element, due to the more dense housing projects that might be constructed under Alternative C. Similar to the 2009 Housing Element, Alternative C encourages increased density near major transit lines, which

could result in construction of housing in areas where hazardous materials are used or present. However, as noted for the 2004 and 2009 Housing Elements in *Section V.Q. Hazards and Hazardous Materials*, impacts related to hazardous waste sites are typically project-specific and projects on Brownfield sites would be subject to the review and/or mitigation by the City's SFDPH and/or the applicable regulator of hazardous waste. Specific mitigation measures would be developed in consultation with the SFDPH based on the real or perceived contaminants that may be onsite. Therefore, this impact would be similar to the 2004 and 2009 Housing Elements and would be ***less than significant*** under Alternative C.

Development under Alternative C could result in a localized increase in congestion, which could interfere with an emergency evacuation route, for reasons similar to those discussed for the 2004 and 2009 Housing Elements under Impact HZ-5 in *Section V.Q. Hazards and Hazardous Materials*. In the event of a natural disaster, increased congestion could slow an evacuation effort within the City. However, the City's ERP, prepared in April 2008, was developed to ensure allocation of and coordination of resources in the event of an emergency in the City. The existing street grid provides ample access for emergency responders and egress for residents and workers. Thus, similar to the 2004 and 2009 Housing Elements and the assessment of this issue Under Impact HZ-5, Alternative C would neither directly nor indirectly alter that situation to any substantial degree and the impact would remain ***less than significant.***

Similar to the impacts of the 2004 and 2009 Housing Elements described under Impact HZ-6 in *Section V.Q. Hazards and Hazardous Materials*, Alternative C could result in impacts related to risk associated with fire if new housing is constructed in near areas with potential for wildland fires or if new housing would include certain features that would put residents or workers at risk. San Francisco ensures fire safety primarily through provisions of the San Francisco Building Code and Fire Code. Existing buildings are required to meet standards contained in these codes. All housing constructed under Alternative C, including high-rise residential buildings up to forty stories, would be required to meet standards for emergency access, sprinkler and other water systems, and other requirements specified in the San Francisco Fire Code. Standards pertaining to equipment access would also be met. Plan review for compliance with San Francisco Fire Code requirements, to be completed by DBI and the SFFD, would minimize fire-related emergency dispatches, reducing the demand for fire protection services in the City. This impact would be increased under Alternative C due to the increased promotion of density. However, for reasons similar to the assessment of the 2004 and 2009 Housing Elements under Impact HZ-6, impacts would remain ***less than significant*** under Alternative C.

Overall, impacts to hazards and hazardous materials from Alternative C would be increased from the 2004 and 2009 Housing Elements due to the increased density housing units, but this impact would be ***less than significant.***

Mineral/Energy Resources

The City is not a designated area of significant mineral deposits and no area within the City is designated as a locally-important mineral resource recovery site. Therefore, similar to the 2004 and 2009 Housing Elements there would be ***no impact*** related to the loss of availability of a known mineral resource or the loss of availability of a locally important mineral resource recovery site.

Alternative C could result in greater incentives to redevelop sites, which could increase building demolition. Under Alternative C, density (and construction associated with housing) would be promoted to a greater degree than under the 2004 and 2009 Housing Elements, resulting in increased uses of fuel, water, and energy associated with demolition and construction. On the other hand, the promotion of housing near transit opportunities would reduce energy use associated with transportation. All new development would be required to comply with the previously discussed federal, state, and local regulations. Similar to the 2004 and 2009 Housing Elements as assessed under Impact ME-1 in *Section V.R. Mineral and Energy Resources*, projects constructed under Alternative C would be required to comply with the Environmental Protection Element of the San Francisco General Plan, San Francisco's Green Building Ordinance, San Francisco Residential Energy Conservation Ordinance, and San Francisco Sustainability Plan. New development would also have the opportunity to participate in voluntary programs, such as GoSolarSF and San Francisco's Green Priority Permitting Program. Similar to the 2004 and 2009 Housing Elements, Alternative C would have a ***less than significant*** impact with respect to the use of large amounts of fuel, water, or energy.

Agricultural Resources

The entire City is identified as Urban and Built-Up Land by the DOC and does not contain any important farmland. The City does not participate in the Williamson Act Program and no land within City boundaries is under Williamson Act contract. Therefore, similar to the discussion of the 2004 and 2009 Housing Elements in *Section V.S. Agricultural and Forest Resources*, under Alternative C there would be ***no impact*** related to the direct conversion of Farmland to non-agricultural use, conflict with a Williamson Act contract, or the conversion of Farmland to non-agricultural use due to other changes in the existing environment.

Under Alternative C, there would be no changes to zoning or height and bulk districts. P Districts, which include most of the City's forest and timber resources, would not be at risk for conversion to residential zoning. However, Alternative C could result in impacts related to the loss or conversion of forest land if trees in R districts were removed, damaged, or otherwise physically affected by a new project. However, any project proposed under Alternative C would be required to comply with the San Francisco Planning Code and the required replacement ratios to minimize impacts related to forest resources. Therefore, similar to the 2004 and 2009 Housing Elements, there would be ***no impact*** related to forest land and timberland zoning or the loss or conversion of forest land.

The SFRPD supports and manages a program of 40 community gardens on City-owned property. Community gardens are allowed on SFRPD lands zoned P District and allowed in all R Districts (RH, RC, RM). New housing could include projects built to the maximum allowable height and bulk capacity, which could block sun on plots currently used for urban farming or community gardens or otherwise physically affect community gardens. Although this impact could potentially increase under Alternative C, the incremental change would not be expected to substantially affect agricultural resources. New housing could also result in development of lots currently used for community gardens. Under Alternative C, there would be no changes to zoning or height and bulk districts and therefore, no new conflicts with existing zoning for agricultural uses. Therefore, for reasons similar to those provided under Impact AG-1

in *Section V.S. Agricultural and Forest Resources*, impacts under Alternative C would be similar to the 2004 and 2009 Housing Elements and ***less than significant.***

Attainment of Project Objectives

Alternative C themes focus on Transit-Oriented Development, balancing growth with available infrastructure, utilization of City-owned vacant or underused sites, encouraging family-sized housing, comprehensive neighborhood planning to accommodate the need for housing, and public outreach around the housing planning process. Additionally, similar to the 2009 Housing Element, Alternative C would encourage housing integrated into new commercial or institutional projects and housing projects near major transit lines. The additional policies and implementation measures in Alternative C are specific strategies intended to increase the number of units on individual sites.

As described below, Alternative C would attain all of the project objectives to the same or greater degree as the 2004 Housing Element and the 2009 Housing Element:

- **Provide a vision for the City's housing and growth management through 2014.** Alternative C provides such a vision for the City's future residential development.

- **Maintain the existing housing stock to serve housing needs.** Alternative C contains policies that emphasize retention of the existing housing stock.

- **Ensure capacity for the development of new housing to meet the RHNA at all income levels.** Part I of the Housing Element would not differ from either the 2004 or the 2009 Housing Element under Alternative C. As Part I demonstrates, the City can accommodate the RHNA quantities within the existing zoning designations, so adequate capacity for new housing exists. Increased density and reduced parking requirements are both strategies for improving the affordability of new housing by reducing land and development cost per unit. Therefore, Alternative C would be more likely to accommodate the RHNA at all income levels.

- **Encourage housing development where supported by existing or planned infrastructure, while maintaining existing neighborhood character.** Alternative C would more specifically encourage developers to maximize use of housing opportunity sites served by existing or planned infrastructure, although this might result in increased height and bulk on individual building sites, which could have more potential to alter existing neighborhood character in some locations.

- **Encourage, develop and maintain programs and policies to meet projected affordable housing needs.** Alternative C contains specific strategies for maximizing the number of units on residential sites, which would increase the City's likelihood of achieving its RHNA goals.

- **Develop a vision for San Francisco that supports sustainable local, regional and state housing and environmental goals.** The greater efficiency of residential development

supported by Alternative C is consistent with a sustainable approach on a local and regional level, given that San Francisco is a dense city with extensive urban services.

- **Adopt a housing element that substantially complies with California housing element law as determined by the California Department of Housing and Community Development.** Because Alternative C contains the most active strategies promoting housing supply and affordability, it is reasonable to assume that it would likely be certified by HCD.

ENVIRONMENTALLY SUPERIOR ALTERNATIVE

In addition to the discussion and comparison of impacts of the proposed projects and the alternatives, Section 15126.6 of the *CEQA Guidelines* requires that an "environmentally superior" alternative be selected and the reasons for such a selection disclosed. In general, the environmentally superior alternative is the alternative that would be expected to generate the least amount of significant impacts. Identification of the environmentally superior alternative is an informational procedure and the alternative selected may not be the alternative that best meets the goals or needs of the City.

Table VII-4 summarizes the comparative impacts of each of the alternatives when compared to the proposed Housing Elements. The table lists the level of significance of the impacts of the proposed projects to each environmental topic analyzed in Section V and shows whether the impacts anticipated under each proposed alternative would be lesser, similar, or greater than the proposed Housing Elements. The table provides a comparison of the ability of each alternative to avoid or substantially reduce the significant impacts of the proposed Housing Elements.

As shown in Table VII-4, Alternative A and B would reduce the impacts of the proposed Housing Elements. However neither Alternative A nor B would be expected to achieve the RHNA allocation as effectively as the 2004 or 2009 Housing Elements. Achievement of the RHNA is one of the key objectives of the project. However, Alternative B would come closer to meeting the RHNA allocation than Alternative A and would therefore come closer to meeting one of the key objectives of the proposed projects. Alternative A would also result in a potentially significant impact to historic resources. Therefore, Alternative B would be the environmentally superior alternative.

ALTERNATIVES CONSIDERED BUT ELIMINATED FROM FURTHER ANALYSIS IN THE EIR

Section 15126.6(c) of the CEQA Guidelines requires an EIR to identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process, and briefly explain the reasons underlying the lead agency's determination. Given the nature of the proposed Housing Elements, an off-site alternative was not feasible.

Bayview Waterfront Alternative: This alternative includes the 1990 Residence Element Objectives, Goals and Policies, and assumes the zoning in place at the time the 2009 Notice of Preparation for this

Table VII-4
Comparison of Alternatives to the Proposed Housing Elements

Environmental Issue Area	Proposed Housing Elements	ALTERNATIVE A No Project/ Continuation of 1990 Residence Element	ALTERNATIVE B 2004 Housing Element–Adjudicated	ALTERNATIVE C 2009 Housing Element–Intensified
Land Use and Land Use Planning	LTS	=	—	+
Aesthetics	LTS	=	—	+
Population and Housing	LTS	=	=	=
Cultural and Paleontological Resources	LTS	+	+	+
Transportation and Circulation	S	—	=	+
Noise	LTS/M	—	—	+
Air Quality	LTS	+	+	—
Greenhouse Gases	LTS	+	+	—
Wind and Shadow	LTS	=	=	+
Recreation	LTS	—	—	+
Utilities and Service Systems	LTS	—	—	+
Public Services	LTS	=	=	=
Biological Resources	LTS	=	=	=
Geology and Soils	LTS	=	=	+
Hydrology and Water Quality	LTS	=	—	+

Table VII-4
Comparison of Alternatives to the Proposed Housing Elements

Environmental Issue Area	Proposed Housing Elements	ALTERNATIVE A No Project/ Continuation of 1990 Residence Element	ALTERNATIVE B 2004 Housing Element–Adjudicated	ALTERNATIVE C 2009 Housing Element–Intensified
Hazards and Hazardous Materials	LTS	=	—	+
Mineral and Energy Resources	LTS	=	=	+
Agricultural and Forest Resources	LTS	=	=	=

Key:

S = Significant Impact

LTS = Less-than-Significant Impact

LTS/M = Less-than-Significant Impact with Mitigation

\+ = Impact greater than the proposed Housing Elements

= = Impact similar to the proposed Housing Elements

— = Impact less than the proposed Housing Elements

EIR was issued,[5] as well as a project-specific analysis of the Candlestick Point/Hunters Point Shipyard Project (previously referred to as the Bayview Waterfront project). This alternative was considered for its ability to concentrate new residential growth in this area of the City already undergoing substantial redevelopment. Ultimately, the Candlestick Point/Hunters Point Shipyard Project, which was an independent project not dependent on the adoption of the Housing Element, underwent its own environmental review in advance of completion of the EIR for the 2004 and 2009 Housing Elements.[6] The 2004 and 2009 Housing Element draft EIR analysis therefore reflected the Candlestick Point/Hunters Point Shipyard project in its analysis of potential future housing development because the Housing Element EIR assumed the development of the Candlestick Point Hunters Point Shipyard Project as a reasonably foreseeable project. Because of this, it was determined that the Bayview Waterfront Alternative was already within the range of the DEIR analysis and would not provide useful new information (see Table IV-6). Furthermore, this alternative would not reflect several reasonably foreseeable major planning and rezoning efforts underway, including development proposals for Treasure Island and Parkmerced, the Transit Center District Plan, and the Western SoMa Area Plan. Therefore, this alternative was eliminated from further consideration.

Focused Development Alternative: San Francisco's planning efforts over the last decade have concentrated on rezoning particular areas of the City. This alternative would actively direct growth to those plan areas, but would also include policies which allowed little or no growth to occur outside of these areas. Thus, the alternative considers potential Objectives, Policies and Implementation Measures that could be part of an updated housing element in tandem with a land use allocation (i.e. projection of growth by geographic area) based on existing conditions plus all area planning efforts. From a land use control standpoint, such a scenario would comprise existing zoning at the time of NOP issuance and rezoning connected to area plans in progress at that time (see Table IV-6). This alternative reflects interests raised during the EIR scoping process.

This alternative was eliminated from consideration during the process of preparing the Housing Element and this EIR because the City's existing zoning allows for residential development outside of area plans, and because locations outside of area plans contribute to the City's inventory of land available for residential development. Therefore, this alternative would have required downzoning or other limitations on development outside of area plans, which would require substantial regulatory changes (e.g., changes to use controls or height/bulk controls), requiring action by the Planning Commission and the Board of Supervisors. Limiting the supply of housing sites would also compromise the City's ability to achieve the RHNA goals for housing supply and affordability by severely restricting the amount of land within the City available for housing, especially affordable housing which requires the maximum number of potential opportunities in order to overcome the inherent constraints of developing affordable housing in an area with high land costs. Curtailing development in substantial portions of the City could also create conflicts with other General Plan policies encouraging sustainable and equitable development Citywide,

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[5] *This includes the zoning changes accompanying the Market/Octavia Area Plan, Eastern Neighborhood Area Plan, and Balboa Park Better Neighborhoods Plan.*

[6] *Planning Department Case File No 1994.061E*

such as Transportation Element Objective 2 (Use the transportation system as a means for guiding development and improving the environment), Objective 11 (Establish public transit as the primary mode of transportation in San Francisco and as a means through which to guide future development and improve regional mobility and air quality) and Policy 11.3 (Encourage development that efficiently coordinates land use with transit service, requiring that development address transit concerns as well as mitigate traffic problems) and Commerce and Industry Element Policy 6.3 (preserve and promote the mixed commercial and residential character in neighborhood commercial districts. Strike a balance between the preservation of existing affordable housing and needed expansion of commercial activity). For these reasons the alternative was determined to be infeasible.

Reduced Land Use Allocation Alternative: The land use allocation is the distribution of projected growth (i.e. new housing units and population increases) to identified geographic areas. Under a reduced land use allocation, less growth would be assumed Citywide. This alternative includes the 2004 Housing Element Objectives, Goals, Policies and Implementation Measures but assumes a lower total number of new housing units over the planning period of 2005-2025. The alternative was suggested during the EIR scoping process and represents an interest in a Housing Element that controls or limits the amount of residential growth that would occur in San Francisco. However, as described in the EIR, the growth projections that form the basis for the land use allocation are not based on Housing Element policies. The projections reflect regional growth trends as assessed by HCD and ABAG. In order to reduce the number of units developed in San Francisco, the Housing Element would actively need to preclude projected growth. Given that under state law a city's Housing Element must accommodate projected growth at all income levels, this alternative would not result in a Housing Element that complies with state Housing Element law, which is a primary objective of this effort. For these reasons, this alternative was eliminated from further consideration as infeasible.

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