Addendum to Environmental Impact Report

Date:	June 13, 2022
Case No.:	2018-015785ENV
Project Title:	Transbay Block 4 Redevelopment Project
EIR Case No.:	Case No. 2000.048E
State Clearinghouse No.:	95063004, certified April 22, 2004
Project Sponsor:	Allie Stein, Hines; allie.stein@hines.com (415.399.6257)
Agency Contact:	José Campos, Office of Community Investment and Infrastructure, jose.campos@sfgov.org (415.749.2554)
Staff Contact:	Michael Li, San Francisco Planning Department, michael.j.li@sfgov.org (628.652.7538)

CONCLUSION

Based on the further analysis provided below, it is concluded that the analyses conducted and the conclusions reached in the final EIS/EIR certified on April 22, 2004, remain valid. The proposed revisions to land use controls established by the Redevelopment Plan for the Transbay Redevelopment Project Area and the Development Controls and Design Guidelines for the Transbay Redevelopment Project, and accompanying development of Transbay Block 4 would not cause new significant impacts that were not identified in the EIS/EIR, nor would the Proposed Project cause significant impacts that were previously identified in the EIS/EIR to become substantially more severe. No new mitigation measures would be necessary to reduce significant impacts. No changes have occurred with respect to circumstances surrounding the Proposed Project that would cause significant environmental impacts to which the Proposed Project would contribute considerably, and no new information has become available that shows that the Proposed Project would cause significant environmental impacts. Therefore, no supplemental environmental review is required beyond this addendum.

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

José Campos

Manager of Planning and Design Review

Office of Community Investment and Infrastructure

June 13, 2022

Date of Determination

REMARKS

The Successor Agency to the Redevelopment Agency of the City and County of San Francisco (commonly referred to as the Office of Community Investment and Infrastructure or "OCII"), proposes to approve a residential development project on Block 4 of the Transbay Redevelopment Project Area and a new segment of Tehama Street, which includes the following actions (collectively, the Proposed Project): (1) authorize and recommend for approval to the Board of Supervisors of the City and County of San Francisco (City) an amendment to the Redevelopment Plan for the Transbay Redevelopment Project Area (Redevelopment Plan) to increase the maximum height on Transbay Block 4 from 450 feet to 513 feet and increase the maximum floor plate sizes on Block 4 from 7,500 square feet to 13,500 square feet for buildings between 85 feet and 250 feet in height and from 13,000 square feet to 15,200 square feet for buildings between 500 feet and 550 feet in height but limited to the portion of such buildings that is between 85 feet and 122 feet in height; (2) an amendment to the Development Controls and Design Guidelines for the Transbay Redevelopment Project Area (DCDG) to make conforming and related modifications to certain height and bulk restrictions, setback requirements, and other development controls; and (3) authorization of a Disposition and Development Agreement (DDA) and approval of a Schematic Design governing development of the residential development project on Block 4 and a new segment of Tehama Street. As shown in Figure 1, the Project Site consists of Assessor's Block 3739 Lot 010 (Block 4) and Lot 011 (new Tehama Street).

A. PROJECT DESCRIPTION

As shown in Figure 2, the proposed residential development on Transbay Block 4 is a mixed-use development consisting of a Tower Project, a Mid-Rise Project, a Podium that includes the Shared Parking Garage and Public Open Space (each as further described below), and associated streetscape improvements that includes a new segment of Tehama Street. Overall, the Proposed Project would include approximately 955,259 gross square feet[1] (gsf), including approximately 839,341 gsf of residential space and approximately 8,389 gsf of ground-floor retail space. The proposed buildings at the Project Site, as depicted in Figure 3 and Figure 4, would include the following:

- The Tower Project would combine a proposed 513-foot-tall, 47-story mixed-use residential high-rise tower at the corner of Howard Street and Main Street with an adjacent 71-foot-tall, six-story townhouse building, facing Tehama Street. The top of the mechanical enclosure would extend up to 39 feet above the roof of the tower; therefore, the tallest point on the Tower Project would be up to 552 feet above grade. The proposed program at the Tower Project would include ground-floor retail spaces fronting Howard Street, 324 apartment units, 20 townhouse units, and 135 condominium units, along with amenity spaces.
- The Mid-Rise Project would include a 163-foot-tall, 16-story mixed-use residential mid-rise building, facing Howard Street and Beale Street. The top of the mechanical enclosure would extend up to 16 feet above the roof; therefore, the total height of the Mid-Rise Project would be up to 179 feet when the mechanical penthouse is included. The Mid-Rise Project would include 202 apartment units, community rooms, laundry rooms, and other indoor amenities, along with

[1] The total gsf includes residential gsf and retail gsf as well as approximately 107,529 gsf for major utilities, underground parking, and loading and related back-of-house areas on the ground floor.

roof terraces. The ground-floor area of the Mid-Rise Project would include retail space along Howard and Tehama streets.

- The Podium building would consist of a Shared Parking Garage located on three basement levels that would include major utilities, trash areas, tenant storage areas, and parking for users of the Proposed Project. Vehicular parking would consist of approximately 224 physically marked stalls providing parking for up to 275 vehicles (including two car-share vehicles), through a combination of valet parking and vehicle stackers. The Proposed Project would provide a minimum of 556 class I combined bicycle parking spaces within the basement levels of the proposed garage, also serviced by valet staff. In addition, the Podium building would consist of an up to a 20-foot high single-story above ground, connected to and shared by both the Tower Project and the Mid-Rise Project and the basement levels below the entire Proposed Project. The Podium would house utility rooms and related back-of-house services, loading dock, ground-floor valet parking drop-offs, one parking space, and drive aisles and driveway ramps. The roof of the Podium would contain a minimum of 4,250 square feet of Public Open Space, which would be connected by a stairway and a stepped terrace open space connections to Howard and Tehama streets (respectively) at ground level.

Vehicular access to the Project Site would be provided from a new 24-foot-wide curb cut and two-way driveway at Main Street. Off-street commercial loading would occur within the loading dock, which would be accessible from a new 24-foot-wide curb cut on Beale Street. Approximately 340 linear feet of curb would be designated for commercial or passenger loading (i.e., 120 feet on Howard Street, 40 feet on Main Street, 180 feet on Tehama Street). This amount of curb space would equate to 17 passenger loading spaces (assuming 20 feet per space) or about 10 commercial loading spaces (assuming 30 to 35 feet per space). Passenger loading would be in effect 24 hours per day, seven days per week. Commercial loading would be in effect Monday through Saturday from 7 a.m. to 4 p.m., consistent with commercial loading zones in the area. The specific allocation of curb space between passenger and commercial loading has not been defined, and all color curb changes would be subject to review and approval by the San Francisco Municipal Transportation Agency (SFMTA).

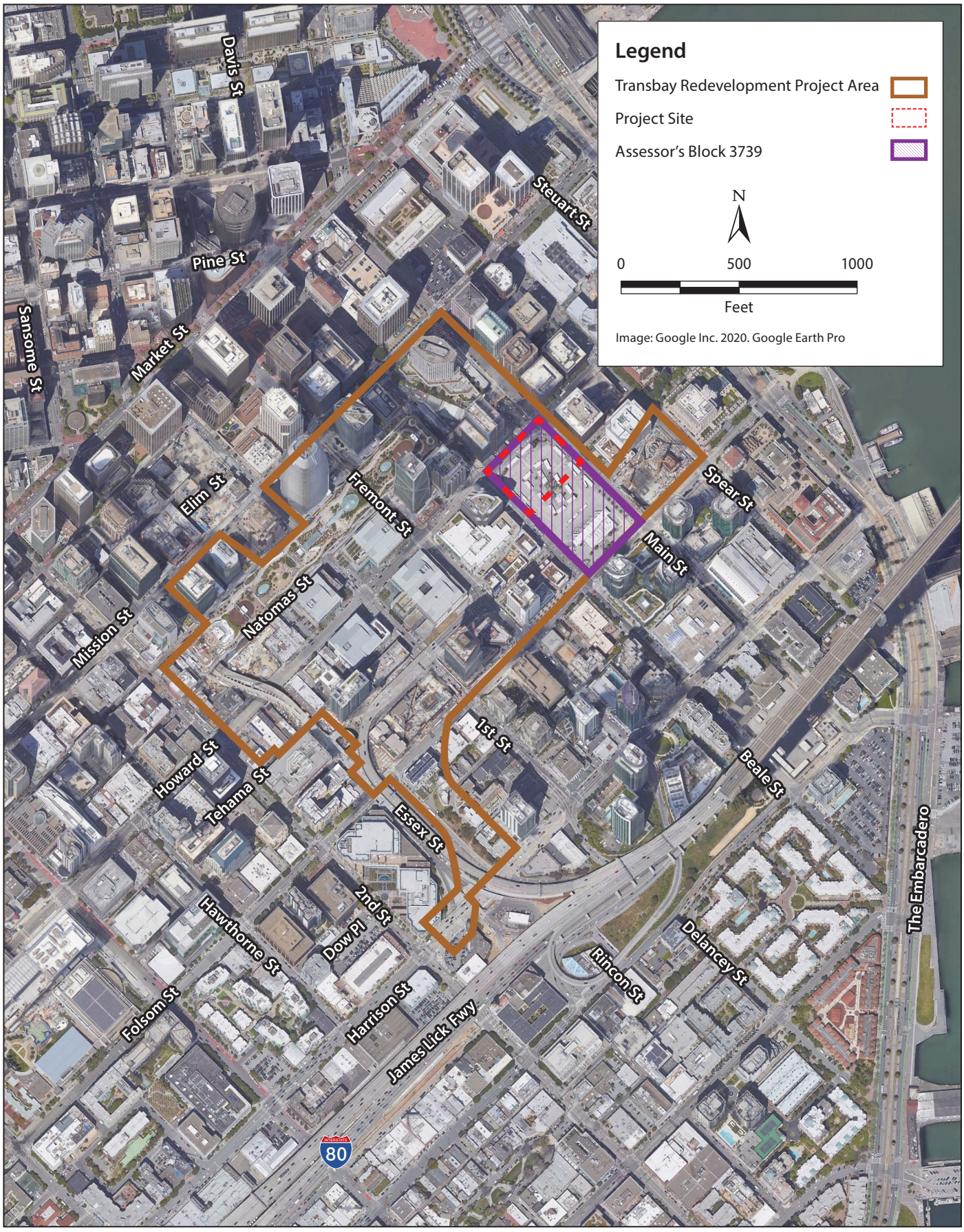

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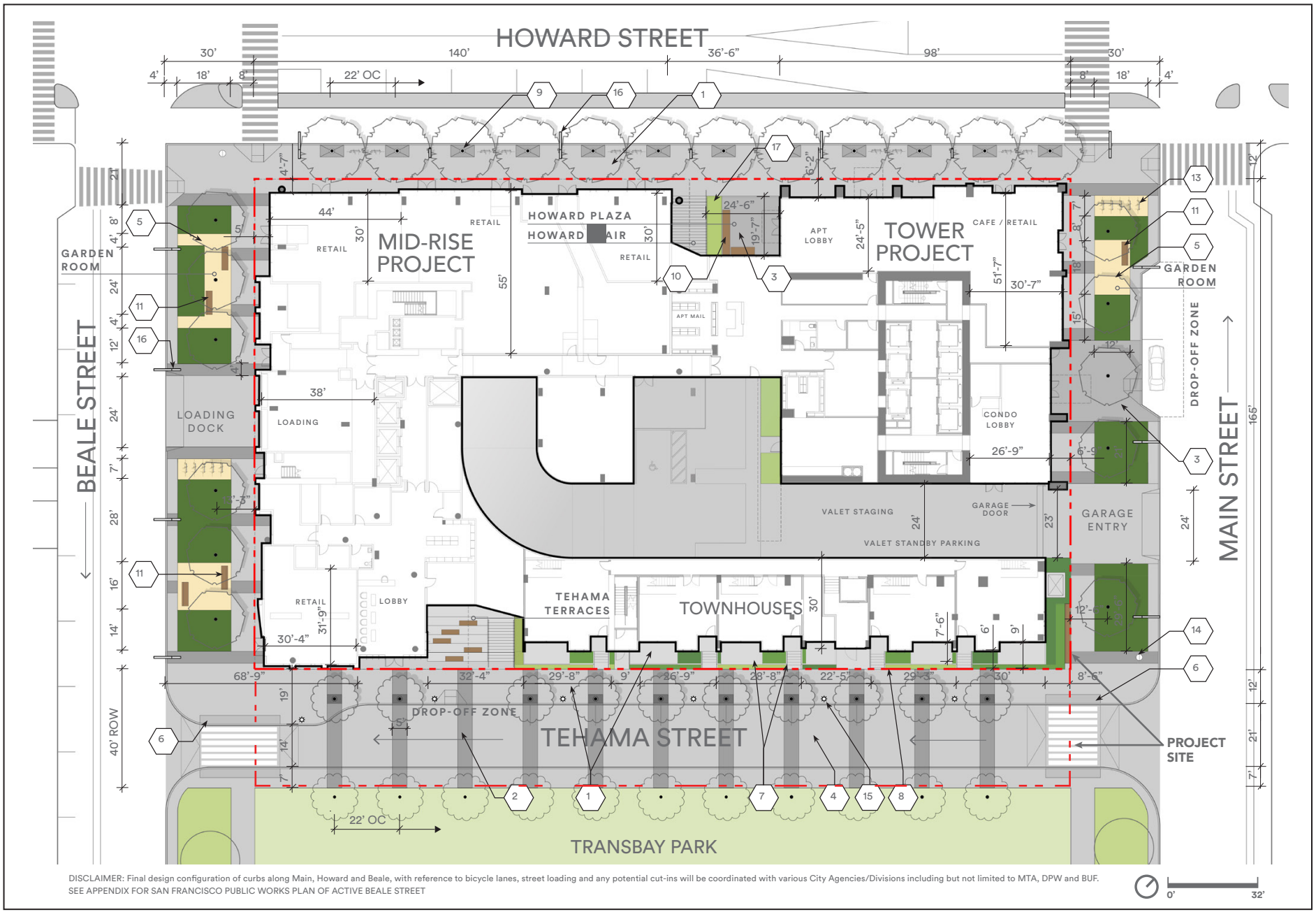
Figure 1
Project Location



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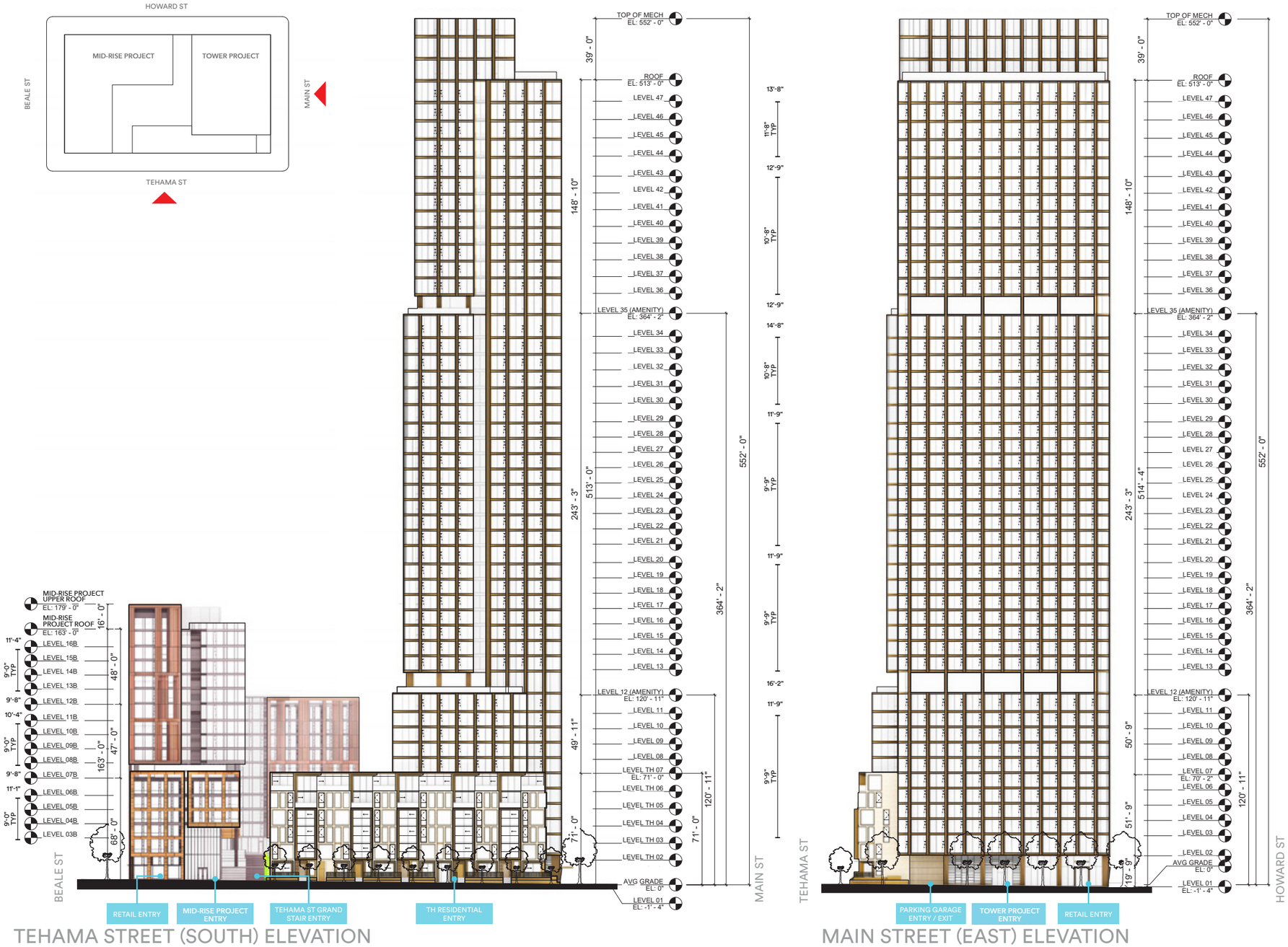
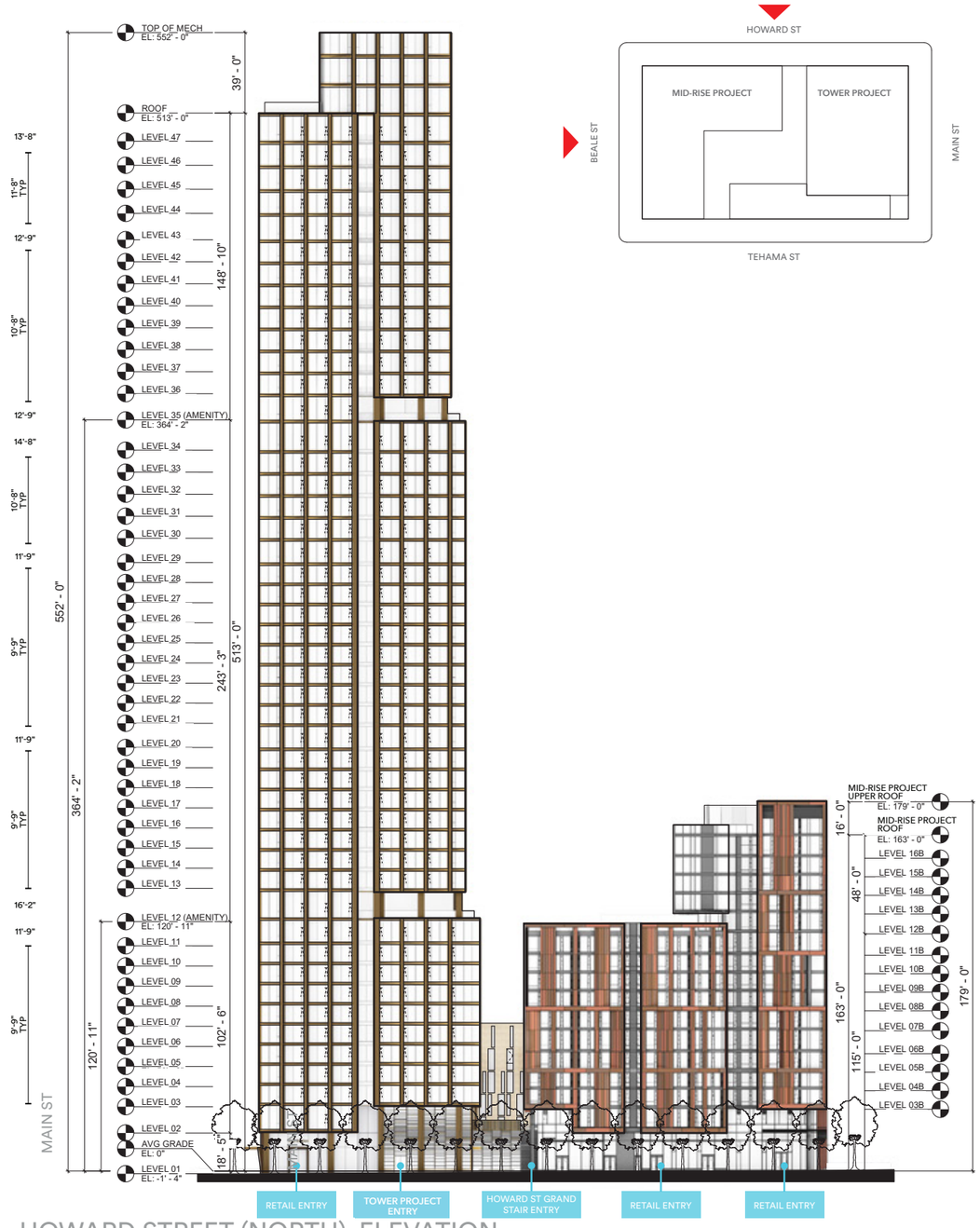
Source: Hines, 2020.

Figure 2
Proposed Site Plan

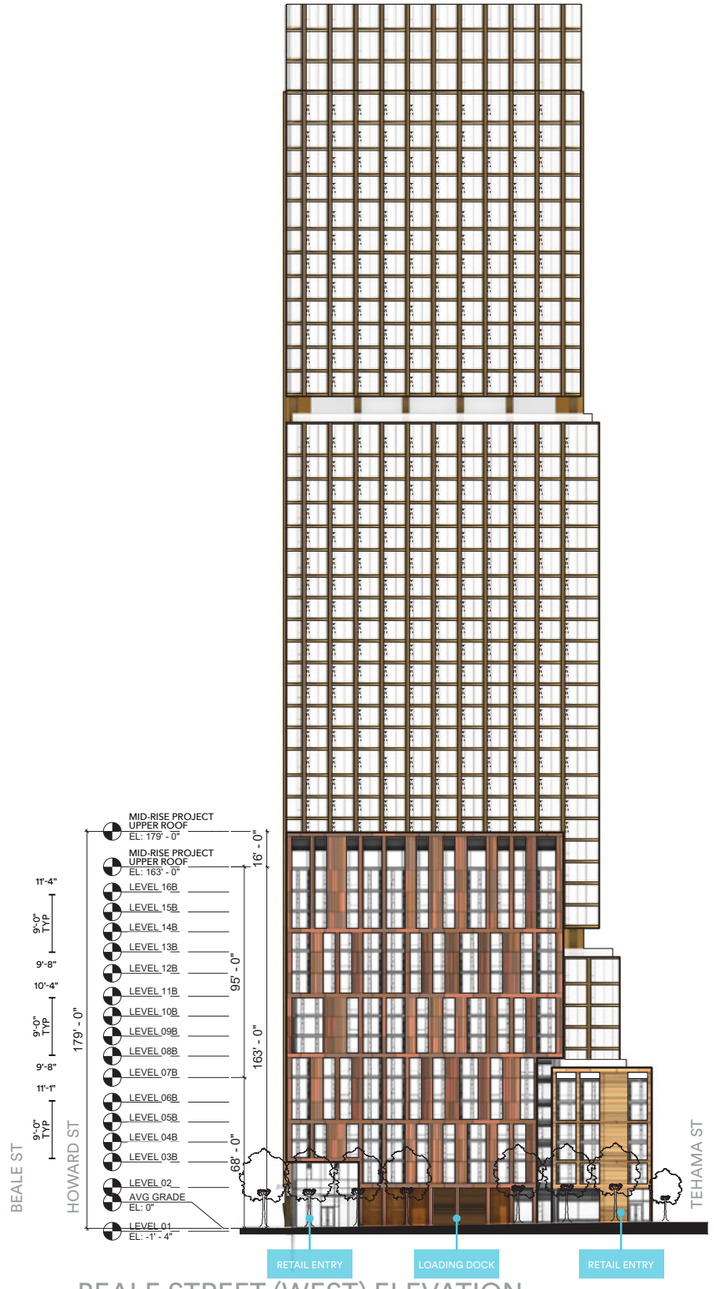


Source: Hines, 2022.

Figure 3
Proposed Elevations - Tehama Street (South) & Main Street (East)



HOWARD STREET (NORTH) ELEVATION



BEALE STREET (WEST) ELEVATION

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Source: Hines, 2022.

Figure 4
Proposed Elevations - Howard Street (North) & Beale Street (West)

Streetscape modifications adjacent to the Project Site would be consistent with the *Transbay Redevelopment Project Area Design for Development* (Design for Development) document published in October 2003 and described and defined in the Redevelopment Plan. The Design for Development provides a development framework for the Transbay Redevelopment Project Area as well as specific design recommendations that apply to all development in the area, including the Proposed Project. For Tehama Street, the Project Sponsor would be responsible for implementing all of the streetscape improvements described below. For Beale Street, Howard Street, and Main Street, the Project Sponsor would be responsible for implementing the streetscape improvements between the property line and the curb; the City would implement the streetscape improvements beyond the curb. Proposed modifications to streets adjacent to the Project Site are as follows:

- **Tehama Street.** The Proposed Project would make Tehama Street a new midblock alley (i.e., a 40-foot right-of-way) between Beale Street and Main Street. The Tehama Street roadway would be approximately 21 feet wide and have one westbound vehicle travel lane, approximately 14 feet wide. A total of nine passenger or commercial loading spaces (about 180 feet long), including two accessible spaces with curb ramps, would be provided on the north side of the street. Raised crosswalks would be provided at the Beale Street and Main Street intersections, connecting the Project Site with the south-adjacent (future) Transbay Block 3 Park. A 12-foot-wide sidewalk with an 8.5 feet clear walkway and curbside tree zone would be constructed on the north side of the street, and a 7-foot-wide sidewalk would be constructed on the south side of the street. A bulb-out would be constructed at the northeast corner of the Tehama Street/Beale Street intersection, increasing the sidewalk width to 19 feet (from 12 feet) and reducing the Tehama Street crossing distance from 21 feet to 14 feet.
- **Beale Street.** Vehicle travel lanes would be reduced from three southbound travel lanes (two mixed-flow lanes and one bus-only lane) to two southbound mixed-flow lanes. A curbside casual carpool lane would be provided on the west side of the street, along with a 6-foot-wide southbound bicycle lane and a 2-foot, 6-inch buffer to separate the bicycle lane from the travel lane. Under the Design for Development program, the east sidewalk would be widened from 10 feet to 30 feet and include a 9-foot-wide clear path of travel adjacent to the building, a 17-foot-wide landscaped area, and a 4-foot-wide hardscaped area along the east curb. A 24-foot-wide curb cut would be constructed to provide vehicle access to the proposed off-street loading dock. However, the City has approved the Active Beale Project, which, instead, would consist of a 12-foot-wide two-way bicycle track and an 8-foot buffer and would be constructed by the City to separate the bicycle lanes from the travel lanes. The Project Sponsor would be responsible for constructing the east sidewalk, which would be widened from 10 feet to 17 feet, 6 inches near the Howard Street intersection and include a 9-foot-wide clear path of travel adjacent to the building; a 6-foot, 6 inch-wide landscaped area; and a 2-foot-wide hardscaped area along the east curb.
- **Howard Street.** Vehicle travel lanes would be reduced from four travel lanes (two westbound mixed-flow lanes, one eastbound mixed-flow lane, and one eastbound bus-only left-turn lane) to two travel lanes (one westbound mixed-flow lane and one eastbound mixed-flow lane), with an eastbound left-turn lane at Main Street. A 12-foot-wide, two-way protected cycle track (class I) would be constructed on the south side of the street, and the existing class III lanes (sharrows) would be removed. Six passenger or commercial loading spaces (about 120 feet long) would be marked on the Project Site frontage, and five passenger or commercial loading spaces (about

100 feet long) would be marked on the opposite (north) side of Howard Street, near the intersection with Beale Street. The existing 12-foot-wide sidewalk with new trees on curbside zone and the 16-foot-wide sidewalk on the north side would be maintained on the street.

- **Main Street.** Vehicle travel lanes would be reduced from three northbound travel lanes (two mixed-flow lanes and one bus-only lane) to two northbound mixed-flow lanes. A northbound 6-foot-wide curbside bicycle lane, with a 2-foot, 6-inch buffer to separate it from the travel lanes, would be provided on the east side of the street. On the west side of the street, two passenger or commercial loading spaces would be marked in an approximately 40-foot-long bulb-in on the Project Site frontage north of the proposed garage driveway. Under the Design for Development program, the west sidewalk would be widened from 15 feet to 30 feet and include a 9-foot-wide clear path of travel adjacent to the Tower Project and two configurations for landscaped and hardscaped areas. North of the driveway, the landscaped area would be reduced to 12.5 feet in width, and the hardscaped area would be reduced to 2.5 feet in width at the loading cut-in. South of the garage driveway would be a 17-foot-wide landscaped area and a 4-foot-wide hardscaped area along the curb. A 24-foot-wide curb cut would be constructed to provide vehicular access to the proposed valet parking in the below-grade garage. The City is studying the design of a new one-way protected bicycle lane on the east side of Main Street, which, if approved, would reduce the sidewalk expansion at the Project Site from the proposed 30 feet to 25 feet, 6 inches.

Detailed construction plans have not been finalized. However, based on preliminary plans, it is anticipated that construction activities would take up to approximately 48 months to complete. Work is expected to occur Monday through Friday from 7 a.m. to 8 p.m. On occasion, construction may also take place on Saturdays from 8 a.m. to 4 p.m. on an as-needed basis and subject to compliance with the San Francisco Noise Ordinance and Department of Building Inspection permit provisions. Construction staging would occur primarily within the confines of the Project Site but occasionally use portions of the public right-of-way along Howard, Main, and Beale streets. Travel-lane, parking-lane, and sidewalk closures would most likely be needed. During periods of travel-lane and sidewalk closures, wayfinding signs and pedestrian protection would be erected, as appropriate, in accordance with the public works code and the blue book.[2]

The Proposed Project described above would require amendments to the Transbay Redevelopment Plan and DCDG, as follows:

Redevelopment Plan Amendments

No.	*Topic*	*Plan Standards*	*Proposed Changes*
1	Tower Maximum Height	Maximum height on Block 4 is 450 feet	Increase maximum height to 513 feet on Block 4
2	Increase Bulk Limit on Tower (maximum floor plate area)	Maximum floor plate area is 13,000 square feet (sf) for the portions of a 513-foot-tall Tower higher than 85 feet	Increase maximum floor plate area on Block 4 to 15,200 sf for buildings over 500 feet tall, but limited to the portion of said

[2] San Francisco Municipal Transportation Agency, *Regulations for Working in San Francisco Streets*, 8th edition, revised October 202, https://www.sfmta.com/sites/default/files/reports-and-documents/2022/05/blue_book_8th_ed_accessible_rev_5-2022_v3.7.4.pdf, accessed June 14, 2022.

			buildings between 85 feet and 122 feet in height
3	Increase Bulk Limit on Mid-Rise Project (maximum floor plate area)	Maximum floor plate area of 7,500 sf for buildings with heights in the range of 85 feet to 250 feet (height of Mid-Rise Project)	Increase maximum floor plate area to 13,500 sf for buildings on Block 4 with heights in the range of 85 feet to 250 feet

Overall Block 4 DCDG Amendments

No.	*Topic*	*DCDG Standards*	*Proposed Changes*
1	Parcel, Setback, & Height Maps	Proposed Project is not compliant with restrictions on Parcel Map 3, Setback Map 4, and Height Map 5	Add alternative to parcel, setback, and height maps to match the Proposed Project
2	Construction over Open Space Parcel	Construction over Open Space Parcel allowed on only one block fronting Folsom Street to accommodate expansion of a ground-floor commercial use, with open space on roof	Allow construction over Open Space Parcel on Block 4 to accommodate ground-floor parking and drive aisles, with open space on roof
3	Townhouse Frontage	Required on Main and Beale streets on Block 4	Eliminate requirement for Townhouse frontages on Main and Beale streets
4	Setbacks on Beale, Howard, Main, and Tehama Streets	Six-foot to 10-foot setbacks required	Eliminate setback requirement on Beale and Howard streets, reduce setback length on Main Street frontage to coincide with Townhouse building, and remove setback requirement on Mid-Rise Project's Tehama Street frontage
5	Off-street Parking on Ground Floor	Off-street parking not allowed on ground floor	Permit off-street handicapped parking and temporary valet parking on the ground floor of Block 4

Tower Project DCDG Amendments

No.	*Topic*	*DCDG Standards*	*Proposed Changes*
6	Tower Building Maximum Height	Maximum height is 450 feet on Block 4	Increase maximum height of Tower Parcel to 513 feet on Block 4
7	Tower Building Maximum Screening Height	Maximum of 10% of building height, or 51 feet, for a 513-foot-tall Tower	Maximum of 39 feet of screening above Tower roofline—must adequately screen mechanical equipment

8	Townhouse Parcel Height	Maximum height of Townhouse Parcels is 50 feet	Increase maximum height of Townhouse Parcel to 71 feet on Block 4
9	Townhouse Maximum Number of Floors	Maximum of four floors	Increase to maximum of six floors for Townhouses on Block 4
10	Maximum Plan Dimension	Maximum plan dimension of 130 feet for buildings with heights between 501 and 550 feet	Increase maximum plan dimension to 150 feet for buildings with heights between 501 and 550 feet on Block 4
11	Maximum Floor Plate Aspect Ratio	Maximum 1:1.2 for buildings with heights between 501 and 550 feet	Increase to 1:1.46
12	Maximum Floor Plate Area	Maximum 13,000 sf above 85 feet for buildings with heights between 501 feet and 550 feet	Increase maximum floor plate area on Block 4 to 15,200 sf for the portions of a Tower over 500 feet tall between 85 feet and 122 feet in height
13	Townhouse Width	Maximum of 30-foot-wide Townhouse modules between unit demising walls	Apply to architectural expression of façade/modulation on Block 4

Mid-Rise Project DCDG Amendments

No.	*Topic*	*DCDG Standards*	*Proposed Changes*
14	Block 4 Podium 1 Parcel Height	Maximum of 65 feet	Increase height to maximum 163 feet, redesignate as Mid-Rise Parcel
15	Block 4 Podium 2 Parcel Height	Maximum of 85 feet	Increase height to maximum 115 feet, redesignate as Mid-Rise Parcel
16	Maximum Plan Dimension	Maximum plan dimension of 100 feet for buildings with heights in the range of 85 feet to 250 feet	Increase maximum plan dimension for buildings with heights in the range of 85 feet to 250 feet on Block 4 to 147 feet
17	Maximum Floor Plate Aspect Ratio	Maximum 1:1.6 for buildings with heights in the range of 85 feet to 250 feet	Increase to 1:1.7 for buildings with heights in the range of 85 feet to 250 feet on Block 4
18	Maximum Floor Plate Area	Maximum 7,500 sf for buildings heights in the range of 85 feet to 250 feet	Increase maximum floor plate area to 13,500 sf for buildings with heights in the range of 85 feet to 250 feet on Block 4
19	Mid-rise Parcel Designation	Designated previously as Townhouse Parcel	Redesignate about 75-foot-long portion of Townhouse Parcel to the Block 4 Mid-Rise Parcel

20	Mid-rise Parcel Height at Tehama & Beale	Maximum height of Townhouse Parcel is 50 feet	Portion of Townhouse Parcel redesignated as Mid-Rise Parcel includes maximum height increase to 68 feet

BACKGROUND

A final environmental impact statement/environmental impact report for the Transbay Terminal/Caltrain Downtown Extension/Redevelopment Project (EIS/EIR Project),[3] San Francisco Planning Department (Planning Department) case number 2000.048E and State Clearinghouse number 95063004, was certified on April 22, 2004, at a joint hearing of the San Francisco Planning Commission and the Transbay Joint Powers Board. The EIS/EIR Project consisted of (1) alternative designs for the new Transbay Terminal; (2) an underground extension to the Caltrain commuter rail system, extending 1.3 miles from its current terminus at Fourth and King streets to downtown San Francisco; and (3) several land use redevelopment alternatives as part of the Transbay Redevelopment Plan. The Transbay Terminal/Caltrain Downtown Extension/Redevelopment Project EIS/EIR has been supplemented with eight addenda issued by the co-lead agencies and/or the responsible agencies administering the EIS/EIR Project.

The Transbay Redevelopment Plan sets forth land use and zoning standards as well as public street and streetscape improvements south of the Transbay Terminal, providing additional office, retail/hotel, and residential development, including affordable housing, in the area. Under the Transbay Redevelopment Plan, OCII, as the successor agency to the Redevelopment Agency of the City, has land use authority over Zone One of the Transbay Redevelopment Plan/Redevelopment Project Area and is the California Environmental Quality Act (CEQA) lead agency for approval actions under the Redevelopment Plan.

Development of Assessor's Block 3739 was included in the Transbay Redevelopment Plan and EIS/EIR analysis. Table 1, below, provides an overview of the development on Assessor's Block 3739 analyzed in the EIS/EIR under the Full Build Alternative and the Reduced Scope Alternative as well as the proposed development on Block 4 under the Proposed Project. The EIS/EIR studied the two alternatives as representations of the range of reasonable development that could occur. As shown in Table 1, the EIS/EIR analyzed development on Assessor's Block 3739 of up to 1,758,375 gsf of residential space (1,465 dwelling units), 397,360 gsf of office space, and 98,935 gsf of retail space under the Full Build Alternative and up to 878,400 gsf of residential space (732 dwelling units) and 58,400 gsf of retail space under the Reduced Scope Alternative.

[3] U.S. Department of Transportation, Federal Transit Administration, City and County of San Francisco, Peninsula Corridor Joint Powers Board, and San Francisco Redevelopment Agency, *Transbay Terminal/Caltrain Downtown Extension/Redevelopment Project Final Environmental Impact Statement/Environmental Impact Report and Section 4(f) Evaluation*, March 2004. Available: <https://tjpa.org/documents/final-eiseir>. Accessed September 2, 2020.

Table 1. Overview of EIS/EIR Full Build Alternative and Reduced Scope Alternative Assumptions Compared to Proposed Project

Square Footage	EIS/EIR Full Build Alternative Assumptions for Assessor's Block 3739	EIS/EIR Reduced Scope Alternative Assumptions for Assessor's Block 3739	Proposed Project
Residential (number of d.u.)	1,758,375 gsf (1,465 d.u.)	878,400 gsf (732 d.u.)	839,341 gsf (681 d.u.)
Office	397,360 gsf	0 gsf	0 gsf
Retail	98,935 gsf	58,400 gsf	8,389 gsf
Total	***2,254,670 gsf***	***936,800 gsf***	***847,730 gsf***[a]

Source: Hines, 2022.

Note:

[a] The total includes residential gsf and retail gsf, plus areas such as lobbies and other shared spaces. The total does not include the area for underground parking, major utilities, or loading on the ground floor. Accounting for all of the aforementioned areas, the Proposed Project would construct a total of approximately 955,259 gsf.

d.u. = dwelling unit; gsf = gross square feet

The DCDG added further specificity to the proposed bulk/massing on the Project Site by calling for townhouses up to 50 feet in height on the southwestern portion of the Project Site; a mid-rise building[4] up to 65 feet in height on the northwestern portion of the Project Site; a mid-rise building up to 85 feet in height on the northern portion of the Project Site; and a tower up to 450 feet in height on the eastern portion of the Project Site, with open space in the central core of the Project Site.[5]

The EIS/EIR characterized the anticipated development in the Transbay Redevelopment Project Area as transit-oriented land uses in the vicinity of the Transbay Terminal, providing a mix of residential and commercial space. The land use plan studied in the EIS/EIR identified a development program for the Block 4 site, consisting of primarily residential uses, with some office and ground-floor retail uses and services.

B. PROPOSED REVISIONS TO THE EIS/EIR PROJECT

The Transbay Redevelopment Plan divided Assessor's Block 3739 into three separate areas: Block 2 (fronting Folsom Street),[6] Block 3 (proposed to include a public park), and Block 4 (fronting Howard Street).

4 DCDG nomenclature refers to these mid-rise buildings as "podium" buildings, but for sake of clarity they are referred to herein as "mid-rise" buildings, as distinguished from the actual Podium building in the Proposed Project.

5 San Francisco Redevelopment Agency, *Development Controls and Design Guidelines for the Transbay Redevelopment Project*, January 25, 2005 (as amended), https://sfocii.org/sites/default/files/20180906_TB_DCDG_Revision.pdf, accessed June 6, 2022.

6 A Request for Proposals (RFP) was released by OCII in August 2020 for the development of mixed-use affordable family and senior rental housing units at Transbay Block 2.

The Project Site, and the focus of this EIR addendum, includes Block 4 and a new segment of Tehama Street immediately adjacent to the southeast.

The Proposed Project differs from the development described in the EIS/EIR in that a 513-foot-tall tower with slightly larger massing at heights between 85 to 122 feet (the Tower Project) is now proposed at the eastern edge of Block 4 instead of the previously analyzed 450-foot-tall tower, and permits larger maximum floor plates (up to 15,200 square feet) that portion of the tower between 85 feet and 122 feet in height. In addition, the mid-rise components of the Proposed Project would be taller than the height and have greater bulk/massing than the limits studied in the EIS/EIR. Table 2, below, compares the development on Assessor's Block 3739 analyzed in the EIS/EIR under the Full Build Alternative to the proposed development on Block 4 under the Proposed Project.

Table 2. Detailed Comparison of EIS/EIR Full Build Alternative Assumptions to Proposed Project

Features	EIS/EIR Full Build Alternative Assumptions for Assessor's Block 3739	Proposed Project
Demolition	All existing structures and parking lots on the site.	All existing structures and parking lots on the site.
Land Use Types	Residential, retail, office	Residential, retail
Total Square Footage	2,254,670 gsf[a]	847,730 gsf[b]
Residential Square Footage	1,758,375 gsf	839,341 gsf
Number of d.u.[b]	1,465 d.u.[a]	681 d.u.
Retail Square Footage	98,935 gsf[a]	8,389 gsf
Tower Height	Up to 450 feet	513 feet*
Townhouse Height	Up to 50 feet	71 feet*
Podium Height (northwest)	Up to 65 feet	163 feet*
Podium Height (north)	Up to 85 feet	115 feet*

Source: Hines, 2022.

Notes:

a. Includes Full Build Alternative for all of Assessor's Block 3739.

b. The total includes residential gsf and retail gsf, plus areas such as lobbies and other shared spaces. The total does not include the area for underground parking, major utilities, or loading on the ground floor. Accounting for all of the aforementioned areas, the Proposed Project would construct a total of approximately 955,259 gsf.

* Indicates non-conformance with the Transbay Redevelopment Plan and the EIS/EIR analysis. Refer to the lists of required amendments to the Transbay Redevelopment Plan and DCDG in Section A, Project Description.

d.u. = dwelling unit; gsf = gross square feet

As shown in Table 2, all features of the Proposed Project would conform to the Redevelopment Plan land use program studied in the EIS/EIR, with the exception of the building heights and bulk/massing. At 513 feet tall, the Proposed Project's tower would be 63 feet taller than the 450-foot height limit established in the Transbay Redevelopment Plan and analyzed in the EIS/EIR. In addition, the increased townhouse and

podium (mid-rise) heights would be 21 to 98 feet taller than the respective height limits. OCII is therefore seeking amendments to the Transbay Redevelopment Plan and DCDG together with its authorization of a DDA and approval of a Schematic Design for the Block 4 Project.

As discussed above, the Transbay Redevelopment Plan divided Assessor's Block 3739 into three separate areas: Block 2 (fronting Folsom Street), Block 3 (proposed to include a public park), and Block 4 (fronting Howard Street). The Proposed Project would not include any potential development on Block 2. The EIS/EIR assumed a maximum buildout on an assessor's block level as the basis for the impact conclusions. To understand the maximum buildout on Assessor's Block 3739 and whether the Proposed Project would fall within the development assumptions for Assessor's Block 3739 in the EIS/EIR, the Proposed Project and the potential development on Block 2 need to be considered together. Table 3, below, provides an overview of the development on Assessor's Block 3739 analyzed in the EIS/EIR under the Full Build Alternative, the proposed development on Block 4 under the Proposed Project, and the potential development on Block 2. As shown in Table 3, the total proposed development on Blocks 2 and 4 would be within the parameters analyzed in the EIS/EIR under the Full Build Alternative for residential, office, and retail square footage; total square footage; and total number of dwelling units. Therefore, this EIR addendum will focus on the proposed increases in heights and bulk/massing at Block 4 compared to the heights and bulk/massing analyzed in the EIS/EIR.

Table 3. Overview of EIS/EIR Full Build Alternative Assumptions Compared to Block 2 and Proposed Project

Square Footage	EIS/EIR Full Build Alternative Assumptions for Assessor's Block 3739	Block 2 (Potential)[a]	Block 4 (Proposed Project)	Total Proposed Development at Blocks 2 and 4
Residential (number of d.u.)	1,758,375 gsf (1,465 d.u.)	239,200 gsf (341 d.u.)	839,341 gsf (681 d.u.)	1,078,541 gsf (1,022 d.u.)
Office	397,360 gsf	0 gsf	0 gsf	0 gsf
Retail	98,935 gsf	12,800 gsf[b]	8,389 gsf	21,189 gsf
Total[c]	***2,254,670 gsf***	***252,000 gsf***	***847,730 gsf***	***1,099,730 gsf***

Sources: Hines, 2022; OCII, 2022.

Notes:

a. Development includes potential buildout at Block 2, but the project at Block 2 is not analyzed in this EIR addendum.

b. The retail square footage includes the proposed childcare uses at Block 2.

c. The total includes residential gsf and retail gsf, plus areas such as lobbies and other shared spaces. The total does not include the area for underground parking, major utilities, or loading on the ground floor. Accounting for all of the aforementioned areas, the Proposed Project would construct a total of approximately 955,259 gsf.

d.u. = dwelling unit; gsf = gross square feet

C. REQUIRED PROJECT APPROVALS

As shown in Table 2, all features of the Proposed Project would conform to the Redevelopment Plan land use program studied in the EIS/EIR, with the exception of building heights and bulk/massing. At 513 feet tall, the Proposed Project's tower would be 63 feet taller than the 450-foot height limit established in the Redevelopment Plan and analyzed in the EIS/EIR. In addition, the townhouse and podium heights would be 21 to 98 feet taller than the respective height limits. OCII is therefore seeking an amendment to the Redevelopment Plan and DCDG to increase the height limit on the Block 4 site from 450 feet to 513 feet and approval of a DDA and a Schematic Design for the Proposed Project.

The following approvals are required for the Proposed Project:

OCII Commission

- Redevelopment Plan Amendment
- Report to Board of Supervisors on Redevelopment Plan Amendment
- DCDG Amendment
- DDA
- Schematic Design

Planning Commission

- General Plan Amendment
- Zoning Map Amendment
- General Plan Consistency Findings - Report and Recommendation to Board of Supervisors

Board of Supervisors

- General Plan Amendment
- Zoning Map Amendment
- Redevelopment Plan Amendment
- Property Disposition Report/Findings

D. ANALYSIS OF POTENTIAL ENVIRONMENTAL EFFECTS

CEQA Guidelines Section 15164 provides that the lead agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions requiring a subsequent or supplemental EIR have occurred. The lead agency's decision to use an addendum must be supported by substantial evidence that the conditions that would trigger preparation of a subsequent EIR, as provided in CEQA Guidelines Section 15162, are not present. The following analysis of environmental effects provides the basis for that determination.

No new or more severe significant impacts beyond those studied in the EIS/EIR would occur, as discussed in Section D, Analysis of Potential Environmental Effects, and the preliminary checklist. Thus, as discussed in Section B, Proposed Revisions to the EIS/EIR Project, the only substantive modifications

to the Proposed Project that were not previously studied in the EIS/EIR are the height change from 450 feet to 513 feet and the change to bulk/massing. Therefore, the only CEQA topics that require additional evaluation are those for which impacts could worsen because of the additional building height: wind and shadow. Wind and shadow studies for the Proposed Project are included as part of the addendum to the EIS/EIR. Moreover, as a transit-oriented infill project, neither aesthetic nor parking impacts are considered significant impacts on the environment.[7] Although not required under CEQA, aesthetics is discussed below. In addition, although the Proposed Project would not generate more trips than anticipated in the EIS/EIR, transportation is analyzed in detail below to allow a full discussion of design-specific site circulation issues. A transportation study for the Proposed Project is included as part of the addendum to the EIS/EIR. Based on the aforementioned reasons, aesthetics, transportation, wind, and shadow are discussed in the subsections below. All other features of the Proposed Project, including demolition, land use types, building square footage, retail square footage, and the number of dwelling units, would be consistent with the maximum development for Assessor's Block 3739 as analyzed in the EIS/EIR. CEQA topics that were evaluated with respect to those features would not require further analysis because no new or more severe significant impacts beyond those studied in the EIS/EIR would occur, and no new mitigation measures would be required.

Based on the analysis in the preliminary checklist, no further analysis is required for the following CEQA topics:

- Agricultural and Forest Resources
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Population and Housing
- Public Services
- Recreation
- Tribal Cultural Resources
- Utilities and Service Systems

The prior addenda to the EIS/EIR generally covered changes to the transportation infrastructure related to the Transbay Terminal/Caltrain downtown rail extension (DTX) portions of the EIS/EIR and were administered by the Transbay Joint Powers Authority (TJPA) and the Golden Gate Bridge Highway and Transportation District. In addition, an environmental review document also analyzed transportation infrastructure related to the Transbay Program Phase 2 (i.e., the Transbay Terminal/Caltrain DTX as well as other transportation improvements and development opportunities associated with the Transbay Program).[8] In November 2018, the Federal Transit Administration, in conjunction with the Federal Railroad Administration and the TJPA, published the Final Supplemental Environmental Impact Statement/ Environmental Impact Report (SEIS/SEIR) to evaluate refinements to the Caltrain DTX component of the

[7] The Proposed Project meets the definition of a mixed-use project on an infill site within a transit priority area, as specified by CEQA section 21099.

[8] The Transbay Terminal/Caltrain Downtown Extension/Redevelopment Project is referred to as the Transbay Program in the SEIS/SEIR.

Transbay Program. On July 22, 2019, the Federal Transit Administration issued an Amended Record of Decision for the Transbay Program's Final Supplemental EIS/EIR; this document amends the 2005 Record of Decision for the Transbay Program and covers the required environmental analysis of refinements to the DTX and other transportation improvements in the vicinity of the Transit Center. The SEIS/SEIR does not contain information that would alter the determination not to require a subsequent or supplemental EIR in connection with the proposed plan amendment and the Proposed Project, pursuant to CEQA Guidelines section 15164. The project evaluated in the SEIS/SEIR includes refinements to the DTX component of the Transbay Program, some additional transportation improvements in the Transbay Redevelopment Area, and potential new development opportunities. However, the draft SEIS/SEIR project does not propose modifications at or adjacent to Block 4 or changes to the Transbay Redevelopment Plan component of the Transbay Program.

Overall land use impacts from the project analyzed in the draft SEIS/SEIR would be minimal, and none of the proposed components would conflict with any applicable land use, policy, or regulation in the Transbay Program area. The potential above-grade development opportunities analyzed under the draft SEIS/SEIR would be compatible with the development intensity and uses nearby. The proposed above-grade development would have no shadow impact on any parks under the jurisdiction of the San Francisco Recreation and Park Department (draft SEIS/SEIR, p. 3.3-20 and 3.3-21.) The draft SEIS/SEIR notes that the proposed intercity bus facility would occupy the roof level of the Transit Center and, therefore, would be adjacent to the proposed City park (now the existing Salesforce Park). However, the elevation of this facility would be only slightly higher than the elevation of the park (approximately 5 feet) and, therefore, would not cast shadow onto the park that would alter the analysis conducted for the proposed plan amendment and the Proposed Project.

As discussed in this EIR addendum, the changes in the Proposed Project would not require major revisions to the EIS/EIR. The number of dwelling units and the total square footage of the Proposed Project, including the square footage of retail uses, would not exceed the assumptions studied in the EIS/EIR Project. In addition, the Proposed Project would not cause new significant impacts not identified in the EIS/EIR. Therefore, no new mitigation measures are necessary to reduce significant impacts. No changes have occurred with respect to circumstances surrounding the Proposed Project that would cause significant environmental impacts to which the Proposed Project would contribute considerably. No new information has become available that shows that the Proposed Project would cause significant environmental impacts that were not previously discussed in the EIS/EIR, that previously examined significant effects would be substantially more severe than shown in the EIS/EIR, that mitigation measures or alternatives that were previously found infeasible are feasible, or that new mitigation measures or alternatives that are considerably different from those in the EIS/EIR would substantially reduce significant impacts.

AESTHETICS

Transbay EIS/EIR

The visual and aesthetics analysis in the EIS/EIR anticipated that the Redevelopment Plan would cause a relatively large increase in the number and size of buildings in the Transbay Redevelopment Project Area. The EIS/EIR also found that public views within and across the Transbay Redevelopment Project Area would generally be limited by new development. The EIS/EIR found that new buildings and vehicles would produce

additional glare, although it would not be expected to result in a substantial visual change. Visual simulations were prepared for the EIS/EIR, based on the 2003 *Transbay Redevelopment Project Area Design for Development Vision (*also known as the Design for Development). The EIS/EIR noted that actual development proposals would undergo individual environmental review for aesthetics in subsequent steps of the redevelopment process, if necessary. The EIS/EIR determined that, although the proposed new development would alter the existing aesthetic nature of the area, the visual features that would be introduced by the Proposed Project are commonly accepted in urban areas and would not substantially degrade the existing visual quality, obstruct publicly accessible views, or generate obtrusive light or glare. For those reasons, no significant impacts were identified, and no mitigation measures were proposed.

Proposed Project and Cumulative Conditions

The Proposed Project meets the definition of a mixed-use project on an infill site within a transit priority area, as specified by CEQA section 21099.[9] Accordingly, this EIR addendum does not contain an in-depth discussion of the topic of aesthetics, which, pursuant to section 21099, cannot be considered in determining the significance of the physical environmental effects of such projects under CEQA. Therefore, the proposed height increase could not result in significant aesthetic impacts under CEQA, and no mitigation measures are necessary.

The Proposed Project would increase the height of the Tower Project from 450 feet to 513 feet. The 513-foot height would match the height of towers constructed in the immediate vicinity of Block 4. However, the tower would be the sole tower on Block 4, providing ample separation from nearby towers. Between Block 4 and the waterfront are Rincon Park, The Embarcadero, and two to three blocks that contain high-rise buildings with podiums and towers. Directly across Howard Street, north of the Project Site, is a newly constructed tower with a roof height of 550 feet. Buildings to the north, between the Project Site and the waterfront, generally step down in height. In addition, considering the approved building heights within districts north, west, and the south of Block 4, which include approved heights between 400 and 1,000 feet, the Proposed Project's height would blend appropriately into the San Francisco skyline, as planned (Figure 5).

TRANSPORTATION

As noted above, the Proposed Project would not exceed the EIS/EIR assumptions for retail, residential, and total square footage, as well as the number of dwelling units, at the Block 4 site. Therefore, the Proposed Project would not generate more person trips or vehicle trips than previously analyzed and would not cause traffic to worsen to a greater degree than reported in the EIS/EIR, as explained further below.

Transportation impact studies prepared by the Planning Department for CEQA purposes estimate future cumulative traffic volumes, based on cumulative development and growth identified by the San Francisco County Transportation Authority's (SFCTA's) SF-CHAMP travel demand model. The SF-CHAMP model uses zoning as part of the basis for its growth calculations. SF-CHAMP data prepared after adoption of the Transbay Redevelopment Plan takes into account the revised zoning for the Transbay Redevelopment

[9] San Francisco Planning Department. September 29, 2020. *Eligibility Checklist: CEQA Section 21099 Modernization of Transportation Analysis.* Record No. 2018-015785ENV, 200 Folsom Street/200-272 Main Street. This document is available for review at the San Francisco Planning Department, 49 South Van Ness Avenue, Suite 1400, as part of Case File No. 2018-015785ENV.

Area, including the Zone One TB DTR (Transbay Downtown Residential) Use District and 50/85/450-TB Height and Bulk District established for the Block 4 site. Therefore, CEQA transportation impact studies prepared after adoption of the Transbay Redevelopment Plan include the potential growth enabled by the plan in their cumulative analyses.

A transportation circulation study was prepared for the Proposed Project,[10] as summarized below and included in Appendix A. The transportation circulation study assumed 683 dwelling units and 8,282 gsf of ground-floor retail space. Subsequent to the preparation of the transportation circulation study, the Proposed Project was revised to include 681 dwelling units and 8,389 gsf of ground-floor retail space. These minor revisions to the Proposed Project were evaluated (refer to Appendix A) and it was determined that there are no changes required to the conclusions in the transportation circulation study.[11]

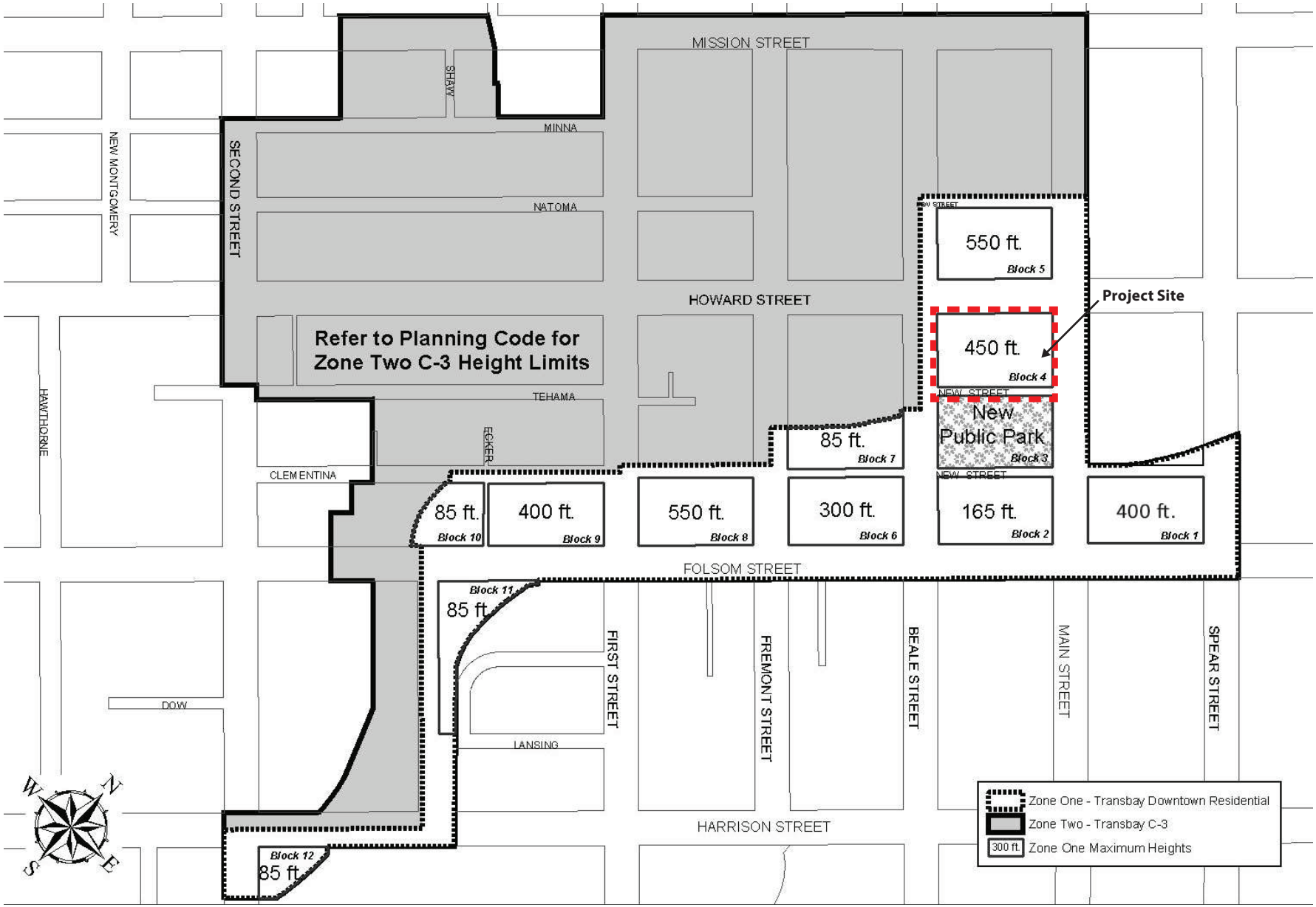
The transportation study area includes all aspects of the transportation network in the vicinity of the block bounded by Howard Street to the north, a new midblock alley section of Tehama Street (and Folsom Street) to the south, Main Street to the east, and Beale Street to the west. The transportation study area consists of travel corridors and facilities such as transit routes and stations, bicycle routes and amenities, pedestrian sidewalks and crossings, and the overall vehicular roadway network that residents, employees, and visitors would use in traveling to and from the Project Site.

The following scenarios were evaluated to identify potential transportation impacts of the Proposed Project:

- **Existing Conditions.** Existing land use and transportation conditions on the block (refer to Appendix A for a summary of existing conditions).
- **Existing-plus-Project Conditions.** Existing land use and transportation conditions with the addition of the Proposed Project. This scenario includes changes to the transportation network since the analysis for the Transbay EIS/EIR was conducted and identifies if these modifications would affect the conclusions of the Transbay EIS/EIR.
- **Cumulative Conditions.** Land use and transportation conditions, considering background growth and development, reasonably foreseeable changes to the transportation network, and incremental growth and development. This scenario includes a review of currently planned cumulative development and streetscape projects and identifies if these modifications would affect the conclusions of the Transbay EIS/EIR.

[10] Kittelson & Associates, *Transbay Block 4 Transportation Circulation Study*, July 17, 2020.

[11] Kittelson & Associates, *Transbay Block 4 – Supplemental Transportation Assessment*, June 8, 2022.



Note: For a detailed map of the permitted height ranges within each block, refer to Map 5 and Figure 3 in the DCDG.

Source: Redevelopment Plan for the Transbay Redevelopment Project Area, 2016.

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Figure 5
Maximum Heights in Transbay Redevelopment Area (Zone One)

The assessment in the transportation circulation study, summarized below, documents the land use and transportation network changes as a result of the Proposed Project and their effects on circulation on transportation modes in the study area. The Proposed Project as well as cumulative conditions are reviewed for impacts related to vehicle miles traveled (VMT), driving hazards, pedestrians, bicyclists, public transit, emergency access, and loading. For each transportation-related topic, an assessment is conducted to determine whether the change in Block 4 would result in changes to the transportation-related findings in the Transbay EIS/EIR. The 2020 impact analysis uses the data and guidance within the Planning Department's 2019 *Transportation Impact Analysis Guidelines* (TIA Guidelines). OCII acknowledges and accepts the use of the TIA Guidelines for the analysis of the Proposed Project's transportation impacts.

Proposed Project Trip Generation

Trip generation refers to the number of estimated trips people would take to and from the Project Site, regardless of the way they travel. Table 4, below, presents the person-trip rates and estimates the number of daily and PM Peak-Hour person trips by land use. Proposed Project person trips were assigned to travel modes (automobile, taxi/transportation network company [TNC], transit, walking, bicycling), based on the mode shares presented in the TIA Guidelines for the Proposed Project's district (district 2, South of Market [SoMa]) and placetype (placetype 1, urban high density). Table 5, below, provides the estimated percentage and number of PM Peak-Hour Proposed Project trips by mode. Table 6, below, presents Proposed Project vehicle trip generation estimates by direction (inbound and outbound).

Table 4. Person-Trip Generation Rates and Estimates by Land Use for the Proposed Project

Land Use	Daily Rate	PM Peak-Hour Percentage, Daily	Daily Person Trips	PM Peak-Hour Person Trips
Residential (1,156 bedrooms)	5/bedroom	8.9%	5,202	459
Restaurant Composite (8,282 gsf)[a]	600/1,000 gsf	13.5%	4,969	670

Sources: 2019 TIA Guidelines; Kittelson, 2020.

Notes:

a. The retail tenants are not known at this time. For conservative purposes with respect to estimating the maximum adverse effect on trip generation, a "composite rate" restaurant is assumed. In addition, the retail area has been increased slightly as part of the conservative scenario.

Table 5. Person-Trip Generation Estimates by Mode and Land Use for the Proposed Project

Mode	Mode Share		Weekday PM Peak-Hour Person Trips		
	Residential	Restaurant Composite	Residential	Restaurant Composite	Total
Auto	25%	11%	115	76	**191**
Taxi/Transportation Network Company	6%	5%	28	31	**59**
Transit	28%	25%	129	170	**299**
Walking	38%	55%	174	368	**542**
Bicycling	3%	4%	13	25	**38**
Total	100%	100%	459	670	1,129
Sources: 2019 TIA Guidelines; Kittelson, 2020.					

Table 6. Proposed Project Vehicle Trip Generation Estimates by Land Use

Land Use	Weekday PM Peak-Hour Vehicle Trips		
	Inbound	Outbound	Total
Residential	60	17	77
Restaurant Composite	14	34	48
Total Private Vehicle Trips	**74**	**51**	**125**
Taxi/TNC	35	35	70
Total Private Vehicle and Taxi/Transportation Network Company Trips	109	86	195
Sources: 2019 TIA Guidelines; Kittelson, 2020.			

As shown in Table 4 and Table 5, the Proposed Project would generate a total of 1,129 person trips (459 generated by the residential component and 670 generated by the restaurant component) during the weekday PM Peak Hour. Of these 1,129 total person trips, 542 would be people walking to and from the site, 299 would be people taking transit, 191 would be automobile person trips, 59 would be taxi/TNC trips, and 38 trips would be made by bicycle. As shown in Table 6, the 191 automobile person trips would result in a total of 125 vehicle trips (77 generated by the residential component and 48 generated by the restaurant component) during the weekday PM Peak Hour. Of these 125 vehicle trips, 74 would be traveling inbound to the Project Site, and 51 would be departing the Project Site. The 59 taxi/TNC person trips would result in a total of 70 taxi/TNC vehicle trips, 35 inbound and 35 outbound. The taxi/TNC vehicle trip generation accounts for trips to and from the Project Site.

Vehicle Miles Traveled

Transbay EIS/EIR

The Transbay EIS/EIR evaluated four traffic scenarios: 1) existing conditions, 2) year 2020 with no project, 3) year 2020 plus project (the Transbay Terminal and Transbay Redevelopment Plan), and 4) a

2020 cumulative scenario that included concurrent and reasonably foreseeable projects. The EIS/EIR analysis showed that background traffic volumes would grow over time and traffic delays would lengthen at nearly all 27 intersections studied, even without implementation of the Transbay Redevelopment Plan. The EIS/EIR identified significant traffic impacts at seven intersections under the 2020 plus-project and the 2020 cumulative scenarios.

The EIS/EIR stated that improvements at individual intersections and implementation of an integrated transportation management system could somewhat reduce localized congestion but may not fully mitigate the impact of increased traffic congestion resulting from the Transbay Terminal and Transbay Redevelopment Plan to a less-than-significant level. The EIS/EIR therefore concluded that the significant traffic impacts would be unavoidable. No mitigation measures applicable to individual development projects were identified.

Existing-plus-Project Conditions

Since preparation of the Transbay EIS/EIR, the Office of Planning and Research and the Natural Resources Agency issued new CEQA Guidelines for analyzing transportation impacts. By July 1, 2020, all CEQA lead agencies must analyze a project's transportation impacts using VMT rather than congestion levels at intersections. On March 3, 2016, the San Francisco Planning Commission adopted the Office of Planning and Research's recommendation to use the "vehicle miles traveled" (VMT) metric instead of automobile delay to evaluate the transportation impacts of projects (Resolution 19579). On October 15, 2019, the OCII Commission adopted, by Resolution No. 25-2019, criteria for determining the significance of transportation impacts based on VMT.[12] A VMT-based approach was used to prepare the transportation analysis for this EIR addendum, which is consistent with Section 21099 of the Public Resources Code, Section 15064.3 of the CEQA Guidelines, the Governor's Office of Planning and Research publication *Technical Advisory on Evaluating Transportation Impacts Under CEQA* (December 2018), and the Planning Department's publication *Transportation Impact Analysis Guidelines* (February 2019).

Consistent with CEQA Guidelines at the time, the Transbay EIS/EIR included an evaluation of automobile delay (vehicle level of service [LOS]), as summarized above; it did not include an evaluation of VMT. As a result, VMT is not specifically addressed in the Transbay EIS/EIR, and no relevant mitigation measures were identified. For the purposes of CEQA, the Proposed Project would not result in significant impacts related to automobile delay (vehicle LOS). No mitigation measures are necessary, and automobile delay is not discussed further in this document (for additional information, refer to Appendix A).

VMT per person (or per capita) is a measurement of the amount and distance that a resident, employee, or visitor drives; it also accounts for the number of passengers within a vehicle. Many interdependent factors affect the amount and distance a person might drive. In particular, the built environment affects how many places a person can access within a given distance or time, and at a given cost, using different ways to travel (e.g., private vehicle, public transit, bicycling, walking, etc.). Typically, low-density development located at great distances from other land uses, and in areas with few options for ways to travel, provides less access than a location with high density, a mix of land uses, and numerous ways

[12] Commission on Community Investment and Infrastructure, Resolution No. 25-2019, October 15, 2019.

to travel. Therefore, low-density development typically generates higher VMT rates than a similarly sized development in an urban area.

Given these behavior travel factors, on average, persons living or working in San Francisco have lower VMT rates than persons living or working elsewhere in the nine-county San Francisco Bay Area region. On a more granular level, persons living or working in some areas of San Francisco have, on average, lower VMT rates per person than persons living or working elsewhere in San Francisco. The City establishes different VMT rates per capita geographically through transportation analysis zones (TAZs).

The SFCTA uses SF-CHAMP to estimate VMT by private automobiles and taxis for different TAZs. The model estimates daily VMT for residential, office, and retail land use types. For residential and office uses, the SFCTA uses tour-based analysis. A tour-based analysis examines the entire chain of trips over the course of a day, not just trips to and from a site. For retail uses, the SFCTA uses trip-based analysis. A trip-based analysis counts VMT from individual trips to and from a site (as opposed to an entire chain of trips). A trip-based approach, as opposed to a tour-based approach, is necessary for retail sites because a tour is likely to consist of trips that stop at multiple locations; therefore, summarizing tour VMT to each location would over-estimate VMT.[13,14,15]

The Project Site is in TAZ 764. Existing average daily VMT per capita in TAZ 764 is below regional average daily VMT per capita, as follows:

- For residential uses, the existing average household daily VMT per capita is 3.2, which is about 81 percent below the existing regional average household daily VMT per capita of 17.2.
- For the retail uses, the average daily VMT per retail employee is 9.2, which is about 32 percent below the existing regional average daily retail VMT per employee of 14.8.

Given the Project Site is in an area where existing VMT is more than 15 percent below the existing regional average, the Proposed Project's residential and retail uses would not cause substantial additional VMT. Furthermore, because of its location within 0.5 mile of an existing major transit stop, the Project Site meets the "proximity to transit stations" screening criterion, which also indicates that the Proposed Project's uses would not cause substantial additional VMT. The Proposed Project would not include features that would substantially induce automobile travel (e.g., additional roadway capacity). For these reasons, VMT-related impacts for the Proposed Project would be less than significant.

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[13] To state another way, a tour-based assessment of VMT at a retail site would consider VMT for all trips in the tour for any tour with a stop at the retail site. If a single tour stops at two retail locations, for example, a coffee shop on the way to work and a restaurant on the way back home, then both retail locations would be allotted the total tour VMT. A trip-based approach allows us to apportion all retail-related VMT to retail sites without double counting.

[14] Retail travel is not explicitly captured in the San Francisco chained activity modeling process; rather, there is a generic "other" purpose, which includes retail shopping, medical appointments, visiting friends or family, and all other non-work, non-school tours. The retail efficiency metric captures all of the "other" travel generated by Bay Area households. The denominator of employment, including retail; cultural, institutional, and educational; medical employment; school enrollment; and number of households, represents the size, or attraction, of the zone for this type of "other" travel.

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

Cumulative Conditions

Cumulative average daily VMT per capita in TAZ 764 is below regional average daily VMT per capita, as follows:

- For the residential uses, the cumulative average household daily VMT per capita is 2.4, which is about 85 percent below the cumulative regional average household daily VMT per capita of 16.1.
- For the retail uses, the cumulative average daily VMT per retail employee is 8.3, which is about 42 percent below the cumulative regional average daily retail VMT per employee of 14.5.[16]

As with the existing-plus-project analysis, the Project Site meets the "proximity to transit stations" screening criterion and is in an area where cumulative VMT would be more than 15 percent below the cumulative regional average. The Proposed Project's residential and retail uses would not cause substantial additional VMT. Therefore, no significant cumulative VMT impacts would occur.

Driving Hazards

Transbay EIS/EIR

This section provides a qualitative assessment of the effect of the Proposed Project on conditions for people driving. It considers whether the Proposed Project could create potentially hazardous conditions for people driving or result in new or substantially more severe transportation impacts than those identified in the Transbay EIS/EIR. However, driving hazards were not specifically addressed in the Transbay EIS/EIR. Therefore, no relevant mitigation measures were identified in the Transbay EIS/EIR.

Existing-plus-Project Conditions

The Proposed Project would consist of parking for up to 275 vehicles (including two car share vehicles) within 224 physical stalls and additional space provided by car stackers, , all serviced exclusively by valet staff, which would be accessible via a 24-foot-wide curb cut and a two-way driveway along Main Street. The garage driveway would provide entry and exit lanes on the left-hand side; the directionality would be reversed from a typical orientation so that inbound and outbound left turns would not overlap. The reversed directionality would reduce the potential for conflicts while entering or exiting the driveway. During the PM Peak Hour, demand from the Proposed Project would generate 74 inbound and 51 outbound vehicle trips. Outbound vehicle trips would be naturally metered by the rate at which valet operations occur. The proposed staging area would accommodate inbound valet trips onsite rather than in the public right-of-way or along the driveway. Inbound drivers would make the left turn from the leftmost travel lane. Outbound drivers would have a generally unobstructed view of northbound traffic as they turn left onto Main Street.

The Project Site would also include a 24-foot-wide curb cut along its Beale Street frontage to provide freight access to the proposed off-street loading dock, which would include two 10-foot-wide loading bays. The Proposed Project would generate a demand for four freight and delivery service-vehicle loading spaces

[16] Retail travel is not explicitly captured in the San Francisco chained activity modeling process; rather, there is a generic "other" purpose, which includes retail shopping, medical appointments, visiting friends or family, and all other non-work, non-school tours. The retail efficiency metric captures all of the "other" travel generated by Bay Area households. The denominator of employment, including retail; cultural, institutional, and educational; medical employment; school enrollment; and number of households, represents the size, or attraction, of the zone for this type of "other" travel.

during the peak hour and two spaces during the average hour. The proposed supply of on- and off-street freight loading spaces would meet expected peak-hour demand. To access the loading dock, trucks would need to reverse into the loading dock, which may temporarily block one or both vehicle travel lanes on Beale Street while they maneuver. Freight and delivery service vehicles would be traveling at speeds of less than 5 miles per hour (mph) as they maneuver into/out of the loading dock. Given the signalized intersection spacing and the observed vehicle speed and progression along the corridor, people driving would also be traveling at relatively slow speeds. They would have clear sight lines and be able to see and react to downstream truck activity. For these reasons, the curb cut would constitute a temporary obstruction for through traffic but would not cause potentially hazardous conditions for people driving.

The proposed extension of Tehama Street to allow one-way (westbound) travel between Main and Beale streets would provide improved multi-modal and vehicle circulation in the study area. Raised crosswalks along Tehama Street at Main and Beale streets would reduce the speed of vehicles while entering and exiting Tehama Street and minimize the potential for conflicts.

Given the traffic volume and site design, the Proposed Project would not result in vehicle queuing or circulation issues that would create potentially hazardous conditions for people driving. Furthermore, the Proposed Project would decrease residential, retail, and office space, compared to the EIS/EIR Full Build Alternative assumptions for the Project Site, resulting in a net reduction in the number of vehicle trips as well as anticipated commercial loading activity. As such, the potential for hazardous conditions for people driving would be less than that analyzed in the Transbay EIS/EIR. Impacts of the Proposed Project would be less than significant, and no mitigation measures are required.

Implementation of Improvement Measure I-TR-1 and Improvement Measure I-TR-2 is recommended to further reduce these less-than-significant impacts.[17]

Improvement Measure I-TR-1: Driveway and Loading Operations Plan (DLOP). The property owner shall implement the following measures to reduce potential conflicts related to driveway operations, including loading activities and people walking, biking, and driving:

- *Trash/Recycling/Compost Collection Design and Management.* The property owner shall provide convenient off-street trash, recycling, and compost storage room(s) for the Proposed Project and a procedure for collection. The transportation coordinator or building manager shall implement these procedures.
- *Color Curb Application.* The property owner shall submit documentation to the Environmental Review Officer to confirm that he or she applied to the SFMTA for on-street color curb zones.
- *Attendant.* The transportation coordinator shall ensure that building management employs a loading dock attendant(s) for the Proposed Project's off-street loading dock. The loading dock attendant shall be stationed at the loading dock driveway to direct vehicles while entering and exiting the loading dock, avoid any safety-related conflicts with public right-of-way users, and ensure proper allocation of freight and delivery service vehicles to available spaces. The loading dock shall be attended during business operating hours, which are anticipated to be 8 a.m. to 10 p.m. every day.

[17] The analysis herein assumes implementation of these improvement measures as conditions of Proposed Project approval, and the Project Sponsor has agreed to them.

- *Driveway Operational Safety.* The transportation coordinator shall provide notifications and information to users of the Project Site regarding driveway operational safety, including the maximum vehicle size and height for the loading dock. The loading dock would be limited to use by vehicles shorter than 30 feet; vehicles longer than 30 feet would be directed to on-street loading zones.
- *Signage/Warning Devices.* The property owner shall install "FULL" signage near the off-street loading dock entrance. The transportation coordinator shall indicate "FULL" if the off-street facility is fully occupied or if the coordinator anticipates it will be occupied by a forthcoming delivery (i.e., in the next 10 minutes). The property owner shall also install signage at the off-street facility to alert drivers to people walking or bicycling who may be behind a vehicle or in a driver's blind spot during access or egress. The property owner shall also install audible warning devices at locations where the off-street facility interfaces with the public right-of-way to alert other public right-of-way users of vehicles entering or exiting the off-street facility.
- *Large Truck Access.* The property owner shall identify convenient on-street loading spaces (i.e., within 250 feet of the site) that could accommodate large trucks (i.e., trucks longer than 30 feet), which the off-street loading facility cannot accommodate. The property owner shall also identify procedures for reserving these spaces from the SFMTA as well as procedures for guiding large trucks to the spaces. The transportation coordinator shall implement these procedures.

The property owner shall prepare a DLOP that documents the Proposed Project's compliance with the measures described above. The details of the DLOP shall be developed in coordination with the Planning Department and the SFMTA and reviewed and approved by the Environmental Review Officer, or designee, of the Planning Department and the Sustainable Streets Director, or designee, of the SFMTA. The final DLOP shall be included as a condition of approval for the Proposed Project. The transportation coordinator shall provide oversight and be responsible for implementation of the DLOP for the Proposed Project. The plan shall be evaluated by a qualified transportation professional, as retained by the Project Sponsor, upon building occupancy and once a year going forward until such time when the SFMTA determines that the evaluation is no longer necessary or could be done at less frequent intervals. The content of the evaluation report shall be determined by SFMTA, in consultation with the Planning Department, and include an assessment of on-street loading conditions, including actual loading demand; observations regarding loading operations; and an assessment of how the Proposed Project meets the requirements. If ongoing conflicts are occurring, based on the assessment, the evaluation report shall put forth additional measures to address conflicts associated with loading operations. The evaluation report shall be reviewed by SFMTA, which shall make the final determination regarding whether ongoing conflicts are occurring. In the event that ongoing conflicts are occurring, the above requirements may be altered (e.g., the hours and days when the loading dock attendant is stationed onsite).

Improvement Measure I-TR-2: Queue Abatement. The property owner, or designee, shall prevent vehicle queues by using proactive abatement methods. A vehicle queue is defined as one or more vehicles waiting to access the Proposed Project's off-street facility and blocking any portion of any public right-of-way for a combined two minutes during the peak consecutive 60 minutes for the adjacent public right-of-way or a combined 15 minutes between the hours of 6 a.m. and 10 p.m. for at least three 24-hour periods in any consecutive seven-day period. The proactive abatement methods shall depend on the characteristics of the Proposed Project's off-street facility, the characteristics of the

street to which the off-street facility connects, and the associated land uses. The proactive abatement methods may include, but are not limited to, installation of "FULL" signs, with active management by parking attendants; use of additional valet parking attendants or other space-efficient parking techniques; and implementation of transportation demand management strategies.

If the planning director, or designee, suspects that a recurring queue is present, the Planning Department shall notify the property owner in writing. Upon request, the owner/operator shall hire a qualified transportation consultant to evaluate conditions at the site for no less than seven days. The consultant shall prepare a monitoring report, which shall be submitted to the Planning Department for review. If the Planning Department determines that a recurring queue does exist, the facility owner/operator shall have 90 days from the date of the written determination to the queue.

Implementation of Improvement Measure I-TR-1 would reduce a less-than-significant impact through active management of the loading dock by an attendant; this would increase driver awareness of other public right-of-way users and reduce the potential for delivery vehicles to double park and obstruct vehicle travel lanes, thereby minimizing potentially hazardous conditions for people driving. Implementation of Improvement Measure I-TR-2 would ensure that vehicle queues related to the Proposed Project would not propagate along the public right-of-way.

Cumulative Conditions

Under cumulative conditions, traffic associated with people walking, bicycling, or driving on the surrounding street network would increase as a result of the Proposed Project, other development projects within the study area, and background growth elsewhere in the city and region. This would generally be expected to lead to an increase in the potential for conflicts between people driving and people walking, bicycling, and public transit operations. However, a general increase in traffic in and of itself would not be considered a potentially hazardous condition.

Under cumulative conditions, with implementation of the Active Beale Street Project, the on-street bicycle lane (class II) along Beale Street would be replaced with a two-way separated bicycle lane (class IV) on the east side of the street; a protected intersection corner would be constructed on the southeast corner of the Howard Street/Beale Street intersection. This shift in bicycle lane location, as well as construction of a concrete island, would increase the offset of the left-turn vehicle movement from Howard Street to Beale Street, potentially slowing turning vehicles and increasing protection for bicyclists at this location. The effects of the Active Beale Street Project and the South Downtown Design + Activation (Soda) plan will be subject to separate study and environmental review.

The Proposed Project would make Tehama Street a new midblock alley between Beale and Main streets; it would also construct a loading dock driveway on Beale Street between Howard Street and Tehama Street. Vehicles accessing the loading dock and vehicles exiting Tehama Street onto Beale Street would turn across the bicycle lane. These vehicle turning movements are not expected to create potentially hazardous conditions for drivers because drivers would generally have unobstructed sight lines and/or adequate sight distance to see approaching vehicles. The presence of the raised crosswalk across Tehama Street would slow vehicles on the intersection approach. Implementation of Improvement Measure I-TR-1 would reduce potential conflicts between freight and delivery service vehicles and people driving by requiring a visual warning device that would alert other right-of-way users when the loading dock is in use, employing a loading dock attendant to manage traffic flow, and requiring vehicles exceeding 30 feet in length to load in on-street zones on Howard Street, Main Street, or Tehama Street rather than in the loading dock.

For these reasons, the Proposed Project in combination with cumulative projects would not create potentially hazardous conditions for people driving. Therefore, there would be a less-than-significant cumulative impact related to driving hazards.

Pedestrians

Transbay EIS/EIR

An assessment of pedestrian conditions in the area surrounding the Transbay Terminal was included in the Transbay EIS/EIR. The evaluation considered pedestrian LOS at five intersections (crosswalks and corners); sidewalk widths, with qualitative analysis of on-sidewalk conditions throughout the study area; and the origin/destination of pedestrian traffic. The evaluation accounted for an increase in pedestrians due to the new Transbay Terminal and Caltrain extension as well as the Transbay Redevelopment Plan. Changes in pedestrian volumes were developed by using output from SF-CHAMP and rerouting pedestrians to and from the Transbay Terminal facility.

The Transbay EIS/EIR found 11 corners and two crosswalks that would operate at LOS F for pedestrians, including all four corners and the north crosswalk at Howard Street and Fremont Street. The crosswalks and corners at the study intersections closest to the Project Site (i.e., Mission Street/Fremont Street and Folsom Street/Beale Street) were found to operate better than LOS F. The Transbay EIS/EIR noted that the EIS/EIR Project itself did not cause the LOS F conditions, concluding that the 9,000 additional walking trips generated by the Transbay Terminal and Transbay Redevelopment Plan by 2020 would not be a considerable contribution to the overall increase in the number of pedestrian trips and determining that the Transbay Redevelopment Plan would not have a significant pedestrian impact. No mitigation measures to address pedestrian impacts were identified.

The Transbay EIS/EIR suggested improvement measures that included wide sidewalks, building setbacks in future construction, enhanced crosswalks with countdown signals, warning lights, and signalized crossings.

Existing-plus-Project Conditions

Access for people walking would be provided on all four of the Proposed Project's street frontages, with an apartment and condominium entry on Howard Street and Main Street, respectively; lobby access for the Mid-Rise Project and the townhouses on Tehama Street; and two retail entrances on Beale Street. The Proposed Project would revise the conditions identified in the DCDG to remove setback requirements along Beale, Howard, Main, and Tehama streets.[18,19] The Proposed Project would include streetscape improvements, such as widened sidewalks, landscaping and street trees, commercial and passenger loading areas, and bicycle facilities, consistent with the Design for Development. The Proposed Project would also provide an internal courtyard on the building's second level that would occupy the inner portion of the Project Site. The courtyard would be accessible from stairs on Howard Street and Tehama Street.

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[18] The DCDG define a *setback* as the open space provided between the property line and the primary built structure, creating an expanded area along the sidewalk and providing a transition between the street and private use on the property. Setbacks may be required to be dedicated for public use or remain as a private space between the public right-of-way and the building mass.

[19] The DCDG (p. 16) identified a setback requirement of 6 to 8 feet along Tehama Street and a setback of 8 to 10 feet along Beale, Main, and Howard streets.

In accessing the Project Site, people walking would cross curb cuts at the proposed garage entry on Main Street and at the loading dock along Beale Street. The sidewalk design would allow exiting vehicles to cross the path of people walking without obstructing their path of travel while waiting to turn onto Main Street. Conversely, inbound vehicles would be able to turn from Main Street into the driveway, with adequate separation between the traveled way and walking paths along the sidewalk. Valet operations would include an adequate short-term staging area to prevent queue spillback into pedestrian travel paths. People driving would generally have unobstructed sight lines and/or adequate sight distance and would not create potentially hazardous conditions related to vehicle entry or exit. Implementation of Improvement Measure I-TR-2 would reduce the potential for conflicts between vehicles accessing the proposed garage and people walking by ensuring that queues would not spill back onto the public right-of-way.

Trucks would access the site using Fremont Street and Howard Street, the nearest truck routes. Trucks accessing the loading docks would cross the proposed 30-foot-wide sidewalk along Beale Street. Some minor conflicts may arise between people walking and trucks backing into the loading docks, most likely in the form of a short delay until the 30-foot-wide sidewalk is unobstructed. Implementation of Improvement Measure I-TR-1 would reduce the potential for conflicts between freight and delivery service vehicles and people walking.

The proposed sidewalk widening and widths along the Project Site frontages would allow an adequate public right-of-way that would accommodate furnishing, throughway, and frontage zones with the removal of building setback requirements on the adjacent streets. The construction of raised crosswalks along Tehama Street at Beale Street and Main Street would help manage vehicle speeds along Tehama Street and reduce speeds as vehicles enter and exit Tehama Street, thereby minimizing the potential for conflicts between vehicles and people walking.

The Proposed Project would generate 841 walking trips (including 299 walking trips to transit) during the PM Peak Hour. Although travel demand analysis does not include assigning walking trips to specific routes, a substantial proportion of these walking trips could be expected to be at the north crosswalk or any of the four corners at the Howard Street and Fremont Street intersection, an area where the Transbay EIS/EIR identified pedestrian LOS impacts. However, a net reduction in the anticipated number of daily and weekday PM Peak-Hour walking trips is expected with the currently proposed land use program on Block 4 relative to the analysis in the Transbay EIS/EIR. Furthermore, the current 2019 TIA Guidelines no longer consider pedestrian crowding to be an impact.

The Proposed Project would not create any potentially hazardous conditions for people walking or interfere with accessibility of people walking to and from the Project Site and adjoining areas. Furthermore, the Proposed Project would decrease the proposed residential, retail, and office space, compared to the EIS/EIR Full Build Alternative assumptions for the Project Site, resulting in a net reduction in Proposed Project–generated trips. As such, the Proposed Project would not result in any new or more severe significant impacts on walking/accessibility compared with those identified in the Transbay EIS/EIR, and no mitigation measures are necessary.

Cumulative Conditions

Under cumulative conditions, traffic from people walking, bicycling, and driving on the surrounding street network would increase as a result of the Proposed Project, other development projects within the study area, and background growth elsewhere in the city and region. However, a general increase in traffic in and of itself would not be considered a potentially hazardous condition. Under cumulative conditions, land use

development within the Transbay Redevelopment Area would conform to the requirements of the Design for Development document, which was created to incorporate public improvements, including sidewalk widening, pedestrian-oriented alleyways, and public plazas, and account for the increased demand for pedestrian and bicycle facilities with the new Transbay Terminal and the new development throughout the Transbay Redevelopment Area.

Although not required, implementation of Improvement Measure I-TR-1 would reduce potential conflicts between freight and delivery service vehicles and people walking. Implementation of Improvement Measure I-TR-2 would reduce the potential for conflicts between vehicles accessing the proposed garage and people walking on Main Street. For these reasons, the Proposed Project in combination with cumulative projects would not create potentially hazardous conditions for people walking. Therefore, there would be a less-than-significant cumulative impact related to walking/accessibility.

Bicycles

Transbay EIS/EIR

A qualitative evaluation of bicycle conditions, particularly, the anticipated increase in bicycle activity with the EIS/EIR Project, was conducted as part of the Transbay EIS/EIR. Increases in bicycle volumes were developed using output from SF-CHAMP. This included additional riders from the Transbay Terminal, Caltrain extension, and the Transbay Redevelopment Plan. The Transbay EIS/EIR estimated that the Transbay Terminal and Transbay Redevelopment Plan could add up to 425 bicycle trips at the five intersections studied during the peak 15-minute window, compared to a total of 45 people bicycling in 2001. The Transbay EIS/EIR noted that there is no standard for determining bicycle LOS and concluded that the increase in bicycle volumes could be accommodated on area streets. No bicycling mitigation measures were identified.

Existing-plus-Project Conditions

The Proposed Project would add an on-street bicycle lane (class II) along the west side of Beale Street as well as the east side of Main Street, which would connect to a bicycle lane (class II) along Folsom Street. The Proposed Project would also provide a separated bicycle lane (class IV) along Howard Street that would connect the bicycle lanes along Beale Street and Main Street. The bicycle infrastructure proposed as part of the Proposed Project would provide dedicated space for bicyclists within the study area, which would reduce the potential for conflicts.

The Project Site would be near several roads that are on the City's Vision Zero High-Injury Network, including Fremont Street, one block southwest of the Project Site, and Folsom Street, west of Beale Street. Folsom Street is a bicycle route that connects inbound bicycle traffic from other parts of the city to the Project Site with continuous bicycle lanes (class II) east of Essex Street through to The Embarcadero. The Proposed Project's provision of connecting bicycle facilities on Beale and Main streets would reduce the potential conflicts for people bicycling to and from this portion of the high-injury network. People bicycling to the Project Site would be unlikely to use Fremont Street for access; they would most likely favor Main Street and Beale Street, which front the Project Site.

Vehicle and truck (i.e., commercial loading) traffic traveling to and from the Project Site would access the driveway and loading dock on Main Street and Beale Street, respectively. Both of these Proposed Project driveways would be on the left side of the street; bicycle facilities would be provided on the right side of each street, thereby limiting conflicts between the two modes at the vehicle access points. Implementation of Improvement Measure I-TR-1 would reduce the potential for conflicts between freight

and delivery service vehicles and people bicycling by requiring a visual warning device that would alert people bicycling when the loading dock is in use, employing a loading dock attendant to manage traffic flow, and requiring vehicles exceeding 30 feet in length to load in on-street zones on Howard, Main, or Tehama streets rather than in the loading dock.

Onsite class I bicycle parking would be provided in the Proposed Project's garage, which would require people bicycling to make a left turn from the proposed right-side bicycle lane (class II) on Main Street and cross two northbound vehicle lanes or dismount at Folsom Street or Howard Street and access the driveway from the sidewalk. All such maneuvers would be made from dedicated bicycle infrastructure. Within the Proposed Project driveway, people bicycling would share the ramp with motor vehicles and navigate the valet staging area. The vehicle speeds on the ramp and within the valet operations area would not pose potentially hazardous conditions. Because class II bicycle parking would be provided along the public right-of-way near each building entrance, people bicycling would access that parking by dismounting and walking on the sidewalk to the appropriate location. Implementation of Improvement Measure I-TR-2 would reduce the potential for conflicts between vehicles accessing the Proposed Project garage and people bicycling by ensuring that queues would not spill back onto the public right-of-way.

The Proposed Project's bicycle parking supply (556 class I spaces) was compared to the Design for Development requirements. That document requires the following:

- A minimum of 12 secure (i.e., class I) bicycle parking spaces in any garage, regardless of development intensity. This would result in 12 required class I spaces for the Proposed Project.
- One additional class I bicycle parking space for every four residential units. This would result in an additional 171 class I spaces for the Proposed Project.
- For non-residential uses, one additional bicycle parking space for every 10 off-street automobile parking spaces provided. None of the proposed vehicle parking would be provided for retail use; therefore, no additional class I bicycle parking would be required.

The total class I bicycle parking requirement for the Proposed Project would be 183 spaces based on the Design for Development document. The Proposed Project would exceed the class I bicycle parking requirement and provide three times the number of spaces required.

The Proposed Project would conform to the commercial and residential density envisioned in the Transbay Redevelopment Plan and would not create potentially hazardous conditions for people bicycling. Furthermore, the Proposed Project would decrease the proposed residential, retail, and office space, compared to the EIS/EIR Full Build Alternative assumptions for the Project Site, resulting in a net reduction in Proposed Project–generated. As such, the Proposed Project would not result in new or more severe impacts related to people bicycling than those identified in the Transbay EIS/EIR, and no mitigation measures are necessary.

Cumulative Conditions

Under cumulative conditions, traffic from people walking, bicycling, and driving on the surrounding street network would increase as a result of the Proposed Project, other development projects within the study area, and background growth elsewhere in the city and region. However, a general increase in traffic in and of itself would not be considered a potentially hazardous condition.

Under cumulative conditions, land use development within the Transbay Redevelopment Area would conform to the requirements of the Design for Development document, which was created to incorporate public improvements, including sidewalk widening, pedestrian-oriented alleyways, and public plazas, and account for the increased demand for pedestrian and bicycle facilities with the new Transbay Terminal and the new development throughout the Transbay Redevelopment Area.

With implementation of the Active Beale Street Project, the on-street bicycle lane (class II) along Beale Street would be replaced with a two-way separated bicycle lane (class IV) on the east side of the street, and a protected corner would be constructed at the southeast corner of the Howard Street/Beale Street intersection. As currently planned, the introduction of a separated two-way facility on Beale Street would improve bicycle circulation by providing more separation between people biking and people driving, a more direct north/south connection, and more options for travel between east/west bicycle facilities on Howard and Folsom streets. Although the effects of the Active Beale Street Project and the Soda plan will be subject to separate study and environmental review, it is anticipated that people biking through the Howard Street/Beale Street intersection would be provided more separation from motor vehicles compared with the existing-plus-project condition as a result of inclusion of a more substantial corner safety island.

The east side bicycle lane would introduce the potential for conflicts between people bicycling and trucks accessing the Proposed Project's loading dock. Truck drivers accessing the loading dock would be required to cross over a future two-way bicycle track, with people bicycling in both directions along the east side of Beale Street between Howard and Folsom streets, that would connect to a proposed bicycle lane on Howard Street. While trucks are reversing into the loading dock, drivers' ability to see people bicycling along Beale Street may be limited. Implementation of Improvement Measure I-TR-1 would reduce the potential for conflicts between freight and delivery service vehicles and people bicycling by requiring a visual warning device that would alert other right-of-way users when the loading dock is in use, employing a loading dock attendant to manage traffic flow, and requiring vehicles exceeding 30 feet in length to load in on-street zones on Howard, Main, or Tehama streets rather than in the loading dock.

The combination of the visual warning device provided at the loading dock to alert drivers and people bicycling and the low truck speeds needed to complete the turning maneuvers into and out of the loading dock would minimize potential hazards for people bicycling. In addition, coordination with the SFMTA, as part of the Proposed Project review process and as part of the Active Beale Street Project, would further reduce the potential for conflicts and minimize hazards for people bicycling. Implementation of Improvement Measure I-TR-2 would reduce the potential for conflicts between vehicles accessing the garage and people bicycling on Main Street by ensuring that queues would not spill back onto the public right-of-way.

For these reasons, the Proposed Project in combination with cumulative projects would not create potentially hazardous conditions for people bicycling. Therefore, there would be a less-than-significant cumulative impact related to bicycling.

Public Transit

Transbay EIS/EIR

For transit, the Transbay EIS/EIR focused on changes in operations for the bus lines that would serve the new Transbay Terminal, the capacity of the terminal facility, and changes in ridership with the extension

of Caltrain. With respect to the Transbay Redevelopment Plan component of the EIS/EIR Project, no quantitative analysis was conducted. In general, it was decided that new development as part of the Transbay Redevelopment Plan would result in increased transit usage, which would help defray the cost of the new transit facilities. The Transbay EIS/EIR estimated that Assessor's Block 3739 (Transbay Blocks 2, 3, and 4) would cause linked transit trips to increase by about 10,000 per day throughout the region. Because the projects at Assessor's Block 3739 would enhance transit connectivity, the Transbay EIS/EIR found no significant transit impacts, and no mitigation measures were identified.

Existing-plus-Project Conditions

The Proposed Project does not include any transit network features, such as modifications to transit service, operations, or amenities. There are no design features that would cause substantial delay for local or regional transit lines operating along streets fronting the Project Site.

Implementation of Improvement Measure I-TR-1 would reduce the potential for conflicts between freight and delivery service vehicles and transit by requiring a visual warning device that would alert transit vehicle drivers when the loading dock is in use, employing a loading dock attendant to manage traffic flow, and requiring vehicles exceeding 30 feet in length to load in on-street zones on Howard, Main or Tehama streets rather than in the loading dock. Implementation of Improvement Measure I-TR-2 would reduce the potential for conflicts between vehicles accessing the garage and transit vehicles on Main Street by ensuring that queues would not spill back onto the public right-of-way. Furthermore, the Proposed Project would decrease the residential, retail, and office space, compared to the EIS/EIR Full Build Alternative assumptions for the Project Site, resulting in a net reduction in Proposed Project–generated trips. As such, the Proposed Project would not result in new or more severe impacts related to transit than those identified in the Transbay EIS/EIR, and no mitigation measures are necessary.

Cumulative Conditions

Under cumulative conditions, there would be a general increase in the number of people riding transit as a result of the Proposed Project, other development projects within the study area, and background growth elsewhere in the city and region. Consistent with the Transbay EIS/EIR assessment, increases in transit ridership are a benefit rather than a potential impact, and the land use and transportation changes assumed to occur as part of cumulative conditions would not create potentially hazardous conditions for transit operations. Furthermore, implementation of Improvement Measure I-TR-1 would reduce the potential for conflicts between freight and delivery service vehicles and transit by requiring a visual warning device that would alert transit vehicle drivers when the loading dock is in use, employing a loading dock attendant to manage traffic flow, and requiring vehicles exceeding 30 feet in length to load in on-street zones on Howard, Main, or Tehama streets rather than in the loading dock. Implementation of Improvement Measure I-TR-2 would reduce the potential for conflicts between vehicles accessing the garage and transit vehicles on Main Street by ensuring that queues would not spill back onto the public right-of-way. In addition, the Proposed Project would decrease the residential, retail, and office space, compared to the EIS/EIR Full Build Alternative assumptions for the Project Site, resulting in a net reduction in Proposed Project–generated trips. As such, the Proposed Project in combination with cumulative projects would result in a less-than-significant cumulative impact related to public transit.

Emergency Access

Transbay EIS/EIR

The Transbay EIS/EIR did not find any significant impacts related to emergency vehicle access to the individual development parcels identified in the Transbay Redevelopment Plan. No mitigation measures to address impacts on emergency vehicle access were identified.

Existing-plus-Project Conditions

The Proposed Project would not include the introduction of physical impediments to emergency vehicle access. Rather, the Proposed Project's extension of Tehama Street could enhance emergency vehicle access. Consistent with the Design for Development, the Proposed Project would include lane restriping to reduce the total lane count. The number of lanes would be reduced from four to two along Howard Street, three to two along Main Street, and three to two along Beale Street. These changes would constitute a reduction in total number of vehicle travel lanes. Some of the reallocation would not serve general mixed-flow traffic but would still provide for emergency vehicle access needs. On Main Street, a portion of the cross-section reallocation would be dedicated to an on-street bike lane (class II), which would still be available roadway space and help serve emergency vehicle access needs. On Beale Street, the curbside casual carpool lane could also be used to serve emergency vehicle needs.

Buildings would be accessible from frontages along four streets (Howard, Tehama, Main, and Beale streets) and designed to meet building code standards for egress and emergency vehicle access. The streetscape designs are being evaluated in consultation with the SFMTA and the San Francisco Fire Department to determine emergency vehicle access needs.

Implementation of Improvement Measure I-TR-1 would reduce the potential for conflicts between freight and delivery service vehicles and emergency access by employing a loading dock attendant to manage traffic flow. Implementation of Improvement Measure I-TR-2 would reduce the potential for conflicts between vehicles accessing the garage and emergency vehicles on Main Street by ensuring that queues would not spill back onto the public right-of-way. Furthermore, the Proposed Project would conform to the development density specified in the Transbay Redevelopment Plan and decrease the residential, retail, and office space, compared to the EIS/EIR Full Build Alternative assumptions for the Project Site, resulting in a net reduction in Proposed Project–generated trips and a reduction in demand for emergency services. As such, the Proposed Project would not result in new or more severe impacts related to emergency vehicle access, and no mitigation measures are necessary.

Cumulative Conditions

Under cumulative conditions, traffic from people walking, bicycling, and driving on the surrounding street network would increase as a result of the Proposed Project, other development projects within the study area, and background growth elsewhere in the city and region. However, a general increase in traffic in and of itself would not be considered a potentially hazardous condition.

Under cumulative conditions, with implementation of the Active Beale Street Project, the on-street bicycle lane (class II) along Beale Street would be replaced with a two-way separated bicycle lane (class IV) on the east side of the street, and a protected intersection corner would be constructed on the southeast corner of the Howard Street/Beale Street intersection. As currently planned, this shift in bicycle lane location would not reduce roadway capacity or prohibit emergency vehicle access. The proposed streetscape designs are being evaluated in consultation with the SFMTA and the San Francisco Fire Department to assess

emergency vehicle access needs, including design detail recommendations, and ensure that emergency vehicle access can be maintained with the proposed bicycle lane and corner safety islands on Beale and Howard streets.

Although there would be a general increase in vehicle traffic from cumulative development projects, prior to finalizing the design and dimensions of any proposed transportation network changes, fire department and police department personnel would review and approve the streetscape modifications, as required, to ensure emergency vehicle access is acceptable. As a result, cumulative development and transportation projects are not expected to inhibit emergency access to the Project Site or materially affect emergency vehicle response. Implementation of Improvement Measure I-TR-1 would reduce the potential for conflicts between freight and delivery service vehicles and emergency access by employing a loading dock attendant to manage traffic flow. Implementation of Improvement Measure I-TR-2 would reduce the potential for conflicts between vehicles accessing the garage and emergency vehicles on Main Street by ensuring that queues would not spill back onto the public right-of-way. For these reasons, the Proposed Project in combination with cumulative projects would result in a less-than-significant cumulative impact related to emergency access.

Loading

Transbay EIS/EIR

The Transbay EIS/EIR did not identify any significant impacts related to commercial or passenger loading associated with the Transbay Redevelopment Plan. No mitigation measures to address impacts on commercial or passenger loading were identified.

Existing-plus-Project Conditions

The Proposed Project would include an off-street loading dock along Beale Street, with two spaces serving SU-30 trucks and smaller from a 24-foot-wide curb cut and driveway. Additional proposed locations for commercial and passenger loading include the nine spaces along Tehama Street, including two accessible spaces with curb ramps; two spaces along Main Street north of the garage driveway; and six spaces along the Project Site side of Howard Street. Loading/unloading zones would be located near building entrances.

Commercial (Freight and Delivery Service) Loading. Based on the travel demand estimates, the Proposed Project would generate demand for four commercial loading spaces in the midday peak hour of commercial loading. The analysis assumes that deliveries would occur primarily from standard box trucks, which are between 30 and 35 feet in length. That demand would be met by the combination of the off-street loading dock (two spaces) and the on-street loading spaces to be provided (340 linear feet of curb along Tehama, Main, and Howard streets on the Project Site frontage). The number of commercial versus passenger loading spaces has not yet been determined and would be subject to SFMTA review and approval. Commercial loading activity would be generated primarily by the retail land uses fronting Howard, Beale, and Main streets; therefore, the spaces along those streets nearest the retail building entrances would be the appropriate locations for designated commercial loading spaces.

This analysis assumes that at least 100 linear feet of the 340 total linear feet would be designated for commercial loading, and the peak commercial loading demand for four freight loading spaces would be met. Furthermore, implementation of Improvement Measure I-TR-1 would reduce the potential for conflicts between freight and delivery service vehicles and transit by employing a loading dock attendant to manage traffic flow and requiring vehicles exceeding 30 feet in length to load in on-street zones on

Howard, Main, or Tehama streets rather than in the loading dock. Furthermore, the Proposed Project would decrease the proposed residential, retail, and office space, compared to the EIS/EIR Full Build Alternative assumptions for the Project Site, resulting in a net reduction in Proposed Project–generated trips. As such, the Proposed Project would not result in any new or substantially more severe significant impacts with respect to commercial loading, and no mitigation measures are necessary.

Passenger Loading. Based on the travel demand estimates, the Proposed Project would generate demand for two passenger loading spaces (approximately 40 linear feet) during any one minute during the peak 15 minutes of the average peak period (one space, or 20 linear feet, of demand associated with both the residential and restaurant use). The proposed 340 total linear feet of passenger and commercial loading supply (approximately 17 spaces) along Tehama (180 linear feet), Main (40 linear feet), and Howard (120 linear feet) streets would serve this level of demand. Although the distribution of commercial versus passenger loading supply along these streets has not yet been determined, 17 spaces (340 linear feet) would adequately serve both needs. The nine spaces (180 linear feet) proposed on the north side of Tehama Street would be located along a one-way westbound street that would be extended as part of the Proposed Project. Two of these nine loading spaces would be accessible spaces with curb ramps. The two spaces along the west side of Main Street would be located within a 40-foot-long bulb-in, thereby minimizing the potential for conflicts with other road users and modes. The six spaces (120 linear feet) proposed on Howard Street would be provided along the south side of the roadway, in front of the Proposed Project.

The supply and siting of on-street loading spaces would meet passenger loading needs at the most convenient location and avoid any significant impacts. Furthermore, the Proposed Project would decrease the residential, retail, and office space, compared to the EIS/EIR Full Build Alternative assumptions for the Project Site, resulting in a net reduction in Proposed Project–generated trips and passenger loading demand. The Proposed Project would not result in any new or substantially more severe significant impacts with respect to passenger loading, and no mitigation measures are necessary.

Cumulative Conditions

Under cumulative conditions, freight and passenger loading activity on the surrounding street network would increase as a result of development projects within the study area. Commercial loading demand is typically hyperlocal, confined to the block faces of the buildings being served. Freight and passenger loading demand generated by cumulative development projects would not be anticipated to use the on-site freight loading dock or on-street freight and passenger loading spaces. However, if cumulative loading demand does increase on the block with the Proposed Project, the supply of on-street loading spaces (up to 17 total spaces, or 340 linear feet) would be enough to support increases in demand under cumulative conditions.

Under cumulative conditions, the on-street bicycle lane (class II) along Beale Street would be replaced with a two-way separated bicycle lane (class IV) on the east side of the street. As currently planned, the introduction of vertical separation between the bicycle lane and the vehicle travel lane would limit the ability of trucks to conveniently complete turning movements into and out of the loading dock. The effects of the Active Beale Street Project and Soda plan will be subject to separate study and environmental review. Further coordination with the SFMTA, as part of this review process and as part of the Active Beale Street Project, will include design detail recommendations to reduce the potential for conflicts and minimize potential hazards associated with commercial loading activities.

Implementation of Improvement Measure I-TR-1 would reduce the potential for conflicts between freight and delivery service vehicles and transit by employing a loading dock attendant to manage traffic flow and requiring vehicles exceeding 30 feet in length to load in on-street zones on Howard, Main, or Tehama streets rather than in the loading dock. The Proposed Project would decrease the residential, retail, and office space, compared to the EIS/EIR Full Build Alternative assumptions for the Project Site, resulting in a net reduction in Proposed Project–generated trips. For these reasons, the Proposed Project in combination with cumulative projects would have less-than-significant cumulative impacts related to loading.

WIND

Transbay EIS/EIR

A wind tunnel test was performed for the Transbay EIS/EIR, using conservative assumptions for the buildings that would be constructed in accordance with the land use program on the redevelopment parcels, including Block 4. The land use program ultimately adopted for the Block 4 site as part of the Transbay Redevelopment Plan included a maximum tower height of 450 feet, which was included in the wind tunnel test. Wind speeds were modeled at 69 locations throughout the Transbay Redevelopment Area, including four locations at the Project Site. The full build alternative modeling resulted in nine locations exceeding the comfort criterion (ground-level speeds in excess of 11 mph) and one location exceeding the hazard criterion (ground-level wind speeds in excess of 26 mph). The Reduced Scope Alternative modeling resulted in seven locations exceeding the comfort criterion and one location exceeding the hazard criterion. None of the comfort criterion or hazard criterion exceedances were located on Block 4 or adjacent blocks. For the purposes of CEQA, only exceedances of the hazard criterion are considered significant impacts.

To address the modeled hazard criterion exceedances, the Transbay EIS/EIR included a mitigation measure that required wind tunnel testing to be performed for all subsequent individual development projects proposed within the Transbay Redevelopment Area. If any exceedances of the hazard criterion occurred, design modifications or other mitigation measures would be required to mitigate or eliminate the exceedances.

Proposed Project and Cumulative Conditions

A wind tunnel test was performed for the Proposed Project, with conclusions outlined in the wind tunnel report summarized below and included in Appendix B.[20] The test modeled the proposed massing with a 550-foot tower (511 feet plus 39 feet for screening of mechanical equipment) with a 175-foot-tall podium and a 65-foot-tall townhouse building.[21] Three scenarios were examined:

(1) Existing Conditions

(2) Existing Conditions plus Proposed Project

(3) Cumulative Conditions plus Proposed Project

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[20] CPP, Inc., *Pedestrian-Level Winds Report: Wind Tunnel Tests for Transbay Block 4*, July 14, 2020.

[21] Regarding the "massing changes" to the Proposed Project, the massing itself has not changed relative to the massing evaluated in CPP's assessment; the methodology for measuring building height has since changed resulting in minor shifts in height (all less than 5 feet) to the proposed buildings.

The cumulative conditions included buildings that are not yet approved or completed that have been added to the Proposed Project configuration, such as high-rise developments studied in the Transbay EIS/EIR. As shown in Table 7, below, wind speeds were modeled at 48 to 50 test points on and near the Project Site. Test points were selected to sample an area that is larger than the area within which wind speeds may be adversely affected by the Proposed Project. The measurement points were chosen to determine the degree of pedestrian comfort or discomfort at locations where relatively severe conditions are frequently found, such as at building corners, near entrances, on adjacent sidewalks with heavy pedestrian traffic, and in open plaza areas. All measurements were made without landscaping in place; therefore, the results may be considered representative of worst-case conditions, as required by the Planning Department. The addition of landscaping features is likely to reduce wind speeds in some locations.

The wind tunnel test assumed the Proposed Project would include a 550-foot tower (511 feet plus 39 feet for screening of mechanical equipment) with a 175-foot-tall podium and a 65-foot-tall townhouse building. Subsequent to the preparation of the wind tunnel test, the methodology used to measure the building heights was clarified, the cumulative conditions changed to include additional developments, and revisions to the massing of the potential development at Block 2. These minor clarifications and revisions to the cumulative conditions were evaluated (refer to Appendix B) and it was determined that there are no changes required to the conclusions in the wind tunnel test.[22]

Table 7. Overview of Wind Comfort and Hazard Criterion Exceedances for the EIS/EIR Full Build Alternative and Reduced Scope Alternative Compared to Proposed Project

Wind Study Scenario	Number of Test Points Studied	Comfort Criterion Exceedances	Hazard Criterion Exceedances
EIS/EIR[a]			
Full Build Alternative	69	9	1
Reduced Scope Alternative	69	7	1
Proposed Project[b]			
Existing Configuration Conditions	48	14	none
Project Configuration Conditions	50	16	none
Cumulative Configuration Conditions	50	6	none

Sources:

a. Federal Transit Administration/City and County of San Francisco, 2004.

b. CPP, Inc., *Pedestrian-Level Winds Report: Wind Tunnel Tests for Transbay Block 4*, July 14, 2020. CPP, Inc., *Potential Model Changes and Expected Impact on Previous Wind Tunnel Test Results for Transbay Block 4*, May 5, 2020. CPP, Inc., *Massing and Cumulative Building Changes and Expected Impact for Transbay Block 4 Redevelopment*, June 7, 2022.

[22] CPP, Inc., *Potential Model Changes and Expected Impact on Previous Wind Tunnel Test Results for Transbay Block 4*, May 5, 2020. CPP, Inc., *Massing and Cumulative Building Changes and Expected Impact for Transbay Block 4 Redevelopment*, June 7, 2022.

Wind Comfort

The EIS/EIR included analysis of the [Project] based on pedestrian comfort criteria established in Planning Code section 148, *Reduction of Ground-level Wind Currents in C-3 Districts*, , which call for equivalent wind speeds of 7 mph in public seating areas and 11 mph in areas of substantial pedestrian use not to be exceeded more than 10 percent of the time year-round between 7 a.m. and 6 p.m. The comfort criteria are not used to determine whether a proposed project would result in a significant wind impact under CEQA. The following discussion is provided for informational purposes only.

Exceedances of the comfort criteria were found at 14 locations under existing conditions. With implementation of the Proposed Project, exceedances of the comfort criteria would increase with the addition of two locations, for a total of 16 locations, but decrease to six locations under cumulative conditions. All locations along Folsom Street, between Main Street and Spear Street, exceed the comfort criteria in the existing configuration. The addition of the Proposed Project would not change the comfort rating at these locations; however, the cumulative configuration provides shelter for some of these locations and eliminates eight comfort exceedances compared with the existing configuration.

Wind Hazards

The EIS/EIR established the wind hazard criterion, as stated in the planning code, as the threshold of significance for environmental impact associated with wind. The criterion is based on wind speeds that are averaged hourly. When based on one-minute averages, as is the case for the comfort criteria, this criterion is increased to 36 mph.[23] The test results for hazardous winds prepared for the Proposed Project used the one-minute average of 36 mph for the wind hazard criterion. No exceedances of the hazard criterion were found under existing conditions, with the Proposed Project, or under the cumulative scenarios. Therefore, no design modification of the Proposed Project, in accordance with the Transbay EIS/EIR wind mitigation measure, would be required. The wind impacts of the Proposed Project would be less than significant.

Based on the analysis in the wind report for the Proposed Project, although the height of the proposed tower would increase compared to what was analyzed in the Transbay EIS/EIR, no significant wind impacts would occur. No new mitigation measures are necessary.

SHADOW

Transbay EIS/EIR

The EIS/EIR included a shadow analysis performed in accordance with CEQA and Planning Code section 295. The methodology analyzes the potential shadow impacts of the Proposed Project on public parks and open spaces as a percentage of theoretical annual available sunlight (TAAS) consumed. TAAS is a measure of the square-foot-hours (sfh) of sunlight that would theoretically be available at a given park or open space during a typical year, assuming that it is sunny during all daylight hours. The first hour of the day after sunrise and the last hour before sunset are excluded from TAAS calculations.

[23] Arens, E., D. Ballanti, C. Bennett, S. Guldman, and B. White, *Developing the San Francisco Wind Ordinance and Its Guidelines for Compliance,* 1989, in *Building and Environment*, Volume 24, No. 4, pp. 297–303.

The EIS/EIR shadow analysis found that the Transbay Terminal and development under the Transbay Redevelopment Plan would not cast shadow on any parks or open spaces subject to section 295.[24] Other public parks and open spaces not subject to section 295 were also evaluated for potential impacts under CEQA. In San Francisco, a significant shadow impact would occur under CEQA if a project were to create new shadow in a manner that would substantially affect outdoor recreation facilities or other public areas.[25] The EIS/EIR indicated that some publicly accessible open spaces would see a reduction in sunlight during certain periods of the day and year, but that additional shading would not amount to a significant impact requiring mitigation measures. The EIS/EIR required all subsequent development projects in the Transbay Redevelopment Area to undergo a shadow analysis.

Proposed Project and Cumulative Conditions

In accordance with the requirements of the EIS/EIR, a shadow analysis was prepared for the Proposed Project (Appendix C).[26] Throughout the analysis, a comparison is made between three shadow-casting scenarios:

- *Existing Conditions:* The shadows cast by existing and anticipated structures in the San Francisco downtown area.
- *DCDG-Compliant Massing:* The additional shadows, relative to existing conditions, that would be cast by Block 4 development that would comply with the current Transbay Redevelopment Plan, the Transbay Design for Development, and the DCDG massing controls previously approved for the site under Transbay Redevelopment Plan legislation. This scenario is consistent with the scenario analyzed in the EIS/EIR.
- *Proposed Project:* The additional shadows, relative to existing conditions, that would be cast by the Proposed Project.

An initial shadow fan analysis prepared for the Proposed Project identified two existing publicly owned open spaces that might be affected by the Proposed Project. These are the recently opened Salesforce Park and the diamond-shaped Rincon Park, which lies between The Embarcadero and the Bayfront Trail. In addition, the analysis included an evaluation of potential shadow on seven smaller, neighboring privately

[24] Section 295 of the planning code applies only to public parks and open spaces that are under the jurisdiction of the San Francisco Recreation and Park Commission.

[25] Prior to 2019, the CEQA significance criterion for shadow was similar to the criterion used under Planning Code Section 295 to determine if net new project shadow would have an adverse impact on the use of any property under the jurisdiction of the San Francisco Recreation and Park Commission. The Section 295 criterion includes the consideration of the quantity of net new project shadow (i.e., the number of square-foot-hours of shadow expressed as a percentage of the total amount of annual sunlight on the affected park[s]). In 2019, the San Francisco Planning Department revised the CEQA significance criterion for shadow to focus less on the quantitative aspect of analyzing shadow impacts under Section 295. Under the revised CEQA significance criterion, a project would result in a significant shadow impact if it would create new shadow that would substantially and adversely affect the use and enjoyment of publicly accessible open spaces. OCII acknowledges and accepts the use of the revised CEQA significance criterion for the analysis of the Proposed Project's shadow impact. For consistency with prior addenda to the EIS/EIR, quantitative information regarding the Proposed Project's shadow is included in this analysis.

[26] Fastcast. 2022. *Shadow Analysis Report – Block 4 San Francisco, CA*. June 2022.

owned public open spaces (POPOS),[27] including Spear Street Terrace, Howard Fremont Plaza, Main Street Plaza, 201 Mission, Salesforce Plaza, Urban Park, and 50 Beale Plaza. The future Block 3 publicly owned open space, Transbay Block 3 Park, is also discussed for informational purposes.

For each of the 10 identified open spaces, a baseline value was calculated that represents the highest theoretical amount of sunlight that each of these open spaces would receive if there were no structures casting shadows on them. This baseline maximum value is referred to as the TAAS, expressed in sfh of sunlight. The TAAS is calculated by multiplying the area of the park/open space by the total number of annual hours that fall between one hour after sunrise and one hour before sunset. Comparing the existing shadow, future shadow, and TAAS values to each other (all expressed in sfh) provides a quantitative summary of key shadow impacts. Table 8 and Table 9, below, summarize the TAAS (shown as a percentage), comparing shadows from existing buildings, existing buildings plus the DCDG-Compliant Massing, and the Proposed Project.

The shadow analysis for the Proposed Project included qualitative impacts on the affected spaces, based on (1) the nature of existing shadow profiles, (2) size and duration of existing versus potential new shadows, and (3) whether or not the identified new shadows could be considered adverse to the quality of observed and established usage. These observations follow the prescribed method in CEQA for characterizing environmental impacts associated with increased shading. These include the shadow characteristics (size, duration, and location of new shadows) as well as the relative importance of sunlight for the identified activity (time of day and year and location for new shadows versus observed open space use).

This section analyzes the net increase of shadows from the Proposed Project (maximum building height at the Project Site at 513 feet) compared to both the DCDG-Compliant Massing scenario (maximum building height at the Project Site at 450 feet, i.e. the scenario analyzed in the EIS/EIR) and, for informational purposes, existing conditions.

Table 8. Shadows on Affected Publicly Owned Open Spaces

	Salesforce Park	**Rincon Park**	**Transbay Block 3 Park (Future)**
Total Shadow from Existing Buildings	49.27%	30.61%	47.46%
Existing Buildings plus DCDG-Compliant Massing			
Total Shadow from Existing Buildings plus DCDG-Compliant Massing	49.29%	30.67%	47.47%
Increase Due to DCDG-Compliant Massing Using Existing Baseline	0.02%	0.06%	0.01%
Existing Buildings + Proposed Project			

[27] The San Francisco General Plan Recreation and Open Space Element characterizes privately owned public open spaces in the denser neighborhoods of the city as "…a critical strategy to promote livability and provide much-needed spaces for relaxation, enjoyment of greenery, and socializing with others." Although these spaces are not subject to the provisions of section 295 of the planning code, the recreation and open space element is clear in that protecting sunlight access to these spaces, especially in the areas and times of highest use, should be a high priority for City officials and private groups.

Total Shadow from Existing Buildings plus Proposed Project	49.30%	30.74%	47.51%
Increase Due to Proposed Project Using Existing Baseline	0.03%	0.13%	0.05%
DCDG-Compliant Massing Compared to Proposed Project			
Additional Increase Due to Proposed Project Beyond Increase Due to DCDG-Compliant Massing	0.01%	0.07%	0.04%
Source: Fastcast, 2022.			

Table 9. Shadows on Affected Privately Owned Public Open Spaces

	Spear Street Terrace	**Howard/ Fremont Plaza**	**Main Street Plaza**	**201 Mission**	**Salesforce Plaza**	**Urban Park**	**50 Beale Plaza**
Total Shadow from Existing Buildings	78.14%	84.68%	65.06%	65.81%	89.46%	53.05%	95.03%
Existing Buildings plus DCDG-Compliant Massing							
Total Shadow from Existing Buildings plus DCDG-Compliant Massing	78.30%	84.74%	68.26%	67.44%	89.47%	64.14%	95.11%
Increase Due to DCDG-Compliant Massing Using Existing Baseline	0.16%	0.06%	3.20%	1.63%	0.01%	11.09%	0.08%
Existing Buildings + Proposed Project							
Total Shadow from Existing Buildings plus Proposed Project	78.45%	85.04%	69.10%	67.69%	89.48%	65.02%	95.13%
Increase Due to Proposed Project Using Existing Baseline	0.31%	0.36%	4.04%	1.88%	0.02%	11.97%	0.10%
DCDG-Compliant Massing Compared to Proposed Project							
Additional Increase Due to Proposed Project Beyond Increase Due to DCDG-Compliant Massing	0.15%	0.30%	0.84%	0.25%	0.01%	0.88%	0.02%
Source: Fastcast, 2022.							

Salesforce Park

Salesforce Park is a 208,072-square-foot (4.78-acre) publicly accessible park located on the roof of the Salesforce Transit Center. The 1,400-foot-long elevated park features a variety of activities and amenities, including gardens, trails, open grass areas, children's play areas, an outdoor amphitheater, as well as space for a future restaurant. The children's play areas are in the central and southwestern portions of the park, and the outdoor amphitheater is in the southwest portion of the park. Salesforce Park is used extensively throughout the day during the week. It is not as busy but still experiences substantial use on weekends.

The DCDG-Compliant Massing would contribute 125,414 sfh (0.02 percent) of new shading approximately four months of the year (mid-April to mid-August). The daily duration of net new shadow on the park under this scenario would range from less than 1 minute to a maximum of 51 minutes, with the average daily duration being about 33 minutes. In comparison, the Proposed Project would contribute 199,311 sfh (0.03 percent) new shading approximately eight months of the year (early January to early March, mid-April to mid-August, and early October to early December). The daily duration of net new Proposed Project shadow would range from less than 1 minute to a maximum of 1 hour and 16 minutes, with the average daily duration being about 44 minutes.

Both the DCDG-Compliant Massing and the Proposed Project would shadow Salesforce Park in the morning, affecting some areas with fixed seating in the northeastern end of the park. Shadow from both scenarios would move off the park around 8:45 a.m. to 9:00 a.m. and would not occur during the middle of the day when many nearby office workers might use the park during their lunch breaks.

The building height increase due to the Proposed Project would result in a net increase in shadow of 0.03 percent compared to existing conditions, and a net increase of 0.01 percent compared to the DCDG-Compliant Massing analyzed in the EIS/EIR. Given the limited duration of shadow and the limited area of the park that would be affected, shadow from the Proposed Project would not substantially and adversely affect the public's use and enjoyment of the park. Therefore, the Proposed Project's shadow impact on Salesforce Park would be less than significant, and no mitigation measures are necessary.

Rincon Park

Rincon Park is an urban diamond-shaped waterfront open space sited between the Embarcadero and the Bay Front Trail just south of the western Bay Bridge anchorage. The park features inviting expanses of lawn, canted and oriented to provide maximum views to the bay. The lawns are edged with a series of low seat walls. Tucked within and between the seat walls are shrub and perennial plantings native to California and coastal areas. Dominating the mounded landform is the Cupid's Span sculpture. Rincon Park is heavily used throughout the day both during the week and on weekends. The park is used for passive recreation (e.g., smoking, informal socializing, eating during lunch breaks, sunbathing). Although the park does not feature any active recreation facilities, cyclists and runners often pass through the park; the eastern boundary of the park abuts the San Francisco Bay Trail.

The DCDG-Compliant Massing would contribute 279,239 sfh (0.06 percent) of new shading approximately 9 months of the year (mid-April to early May, early August to mid-August, and late August to early April). The daily duration of net new shadow on the park under this scenario would range from less than 1 minute to a maximum of 1 hour, with an average daily duration of about 33 minutes. By comparison, the Proposed Project would contribute 607,662 sfh (0.13 percent) of new shading 10 months of the year, between early August and early May. The daily duration of net new shadow from the Proposed Project on the park would range from less than 1 minute to a maximum of 1 hour and 15 minutes, with an average duration of about 43 minutes.

Both the DCDG-Compliant Massing and the Proposed Project would shadow the park in the afternoon and early evening. Compared to shadow from the DCDG-Compliant Massing, shadow from the Proposed Project would be very similar in time of occurrence, duration, and location. Like the DCDG-Compliant Massing, the Proposed Project would not cast net new shadow on the park before 2:30 p.m. on any day of the year. Shadow from the Proposed Project would not occur during the morning and early afternoon when the park is heavily used. Shadow from the Proposed Project would occur during the afternoon and early evening when much of the park is already shadowed by existing buildings and activity levels within the park have decreased substantially.

The building height increase due to the Proposed Project would result in a net increase of 0.13 percent compared to existing conditions, and 0.07 percent compared to the DCDG-Compliant Massing analyzed in the EIS/EIR. The additional shadow from the Proposed Project is not expected to substantially and adversely affect the public's use and enjoyment of the park. Therefore, Proposed Project's shadow impact on Rincon Park would be less than significant, and no mitigation measures are necessary.

Spear Street Terrace (POPOS)

Spear Street Terrace is a 31,716-square-foot (0.73-acre) publicly accessible private open space in the Financial District of San Francisco (Assessor's Block 3741/Lot 032). The plaza is northwest of 2 Folsom Street; the "panhandle" portion is between a parking structure to the northeast and the 201 Spear Street building to the southwest. Access to the plaza is via Steuart Street to the northeast and Spear Street to the southwest as well as a narrower "panhandle" pedestrian passageway from Howard Street to the northwest. Spear Street Terrace is used primarily for passive activity by nearby office workers and as a pedestrian passage between Spear, Howard, and Steuart streets. The plaza experiences its maximum use around lunchtime.

The DCDG-Compliant Massing would contribute 185,116 sfh (0.16 percent) of new shading approximately 4.5 months of the year (late February to early May and early August to mid-October). The daily duration of net new shadow on the park under this scenario would range from less than 1 minute to a maximum of 1 hour and 15 minutes, with the average daily duration being about 50 minutes. By comparison, the Proposed Project would contribute 371,002 sfh (0.31 percent) of new shading approximately six months of the year (early February to early May and early August to early November. With the Proposed Project, the daily duration of net new shadow on the park would range from less than 1 minute to a maximum of 1 hour and 15 minutes, with the average daily duration being about 49 minutes.

Both the DCDG-Compliant Massing and the Proposed Project would shadow the plaza in the afternoon. Shadow from the Proposed Project would occur on the plaza for more days of the year (early February to early May and early August to early November) than shadow from the DCDG-Compliant Massing (late February to early May and early August to mid-October). From mid-August until early October, the Proposed Project would cast a larger shadow on the southwest (Spear Street) entrance to the plaza than the DCDG-

Compliant Massing. Shadow from the Proposed Project would not reach the plaza before 2:45 p.m. and would not occur during the plaza's period of maximum use (11:00 a.m. to 1:00 p.m. for nearby workers' lunch breaks).

The building height increase due to the Proposed Project would result in a net increase of 0.31 percent compared to existing conditions, and 0.15 percent compared to the DCDG-Compliant Massing analyzed in the EIS/EIR. Net new shadow from the Proposed Project would not substantially and adversely affect the public's use and enjoyment of the park. The Proposed Project's shadow impact on Spear Street Terrace would be less than significant, and no mitigation measures are necessary.

Howard/Fremont Plaza (POPOS)

Howard Fremont plaza is an 8,724-square-foot (0.20-acre) urban open space located in the Financial District of San Francisco on Assessor's Blocks 3738/Lots 016 and 017. The T-shaped open space is framed by high rises on the northwest and east and the 50-foot-tall 342 Howard Street Tower Project at the corner of Howard Street and Fremont Street. Howard Fremont Plaza attracts a high number of visitors during lunchtime, including many nearby office workers.

The DCDG-Compliant Massing would contribute 19,471 sfh (0.06 percent) of new shading approximately 4.5 months of the year (early April to mid-April, late April to mid-August, and late August to early September). The daily duration of net new shadow on the park under this scenario would range from 1 minute to a maximum of 30 minutes, with the average daily duration being about 21 minutes. In comparison, the Proposed Project would contribute 117,410 sfh (0.36 percent) of new shading approximately five months of the year (early April to early September). With the Proposed Project, the daily duration of net new shadow on the park would range from 1 minute to a maximum of 1 hour and 45 minutes, with the average daily duration being about 1 hour and 6 minutes.

Both the DCDG-Compliant Massing and the Proposed Project would shadow the southeast (Howard Street) entrance of the plaza during the morning from mid-April until late August. From early May until early August, shadow from the Proposed Project would occur for a longer duration each day than shadow from the DCDG-Compliant Massing (an average of 90 minutes compared to an average of 15 to 30 minutes). Shadow from the Proposed Project would move off the plaza by 9:15 a.m. and would not occur during the plaza's period of maximum use (11:00 a.m. to 1:00 p.m. for nearby workers' lunch breaks).

The building height increase due to the Proposed Project would result in a net increase of 0.36 percent compared to existing conditions, and 0.30 percent compared to the DCDG-Compliant Massing analyzed in the EIS/EIR. Net new shadow from the Proposed Project would not substantially and adversely affect the public's use and enjoyment of the park. The Proposed Project's shadow impact on Howard/Fremont Plaza would be less than significant, and no mitigation measures are necessary.

Main Street Plaza (POPOS)

Main Street Plaza has 4,657 square feet (0.11 acre) of publicly accessible urban open space in the Financial District of San Francisco on Assessor's Block 3740/Lots 033 and 034. The Main Street entry of the plaza, which benefits from a sunny exposure, has two concrete benches, three planters that double as seating along the edges, and modest landscaping. At the eastern edge of the plaza is an expansive fenced play lot for children. Main Street Plaza is used primarily for passive activity by nearby office workers and as a pedestrian passage between Main and Spear streets. The plaza experiences its maximum use around lunchtime.

The DCDG-Compliant Massing would contribute 554,982 sfh (3.20 percent) of new shading during all 12 months of the year. The daily duration of net new shadow on the park under this scenario would range from less than 1 minute to a maximum of 2 hours and 15 minutes, with the average daily duration being about 1 hour and 8 minutes. In comparison, the Proposed Project would contribute 700,136 sfh (4.04 percent) of new shading during all 12 months of the year. With the Proposed Project, the daily duration of net new shadow on the park would range from less than 1 minute to a maximum of 2 hours and 30 minutes, with the average daily duration being about 1 hour and 21 minutes.

Both the DCDG-Compliant Massing and the Proposed Project would shadow the southwest (Main Street) entrance of the plaza during the afternoon throughout the year. From late September until mid-March, shadow from the Proposed Project would reach the plaza about 15 to 30 minutes earlier than shadow from the DCDG-Compliant Massing, but this would occur after 2:00 p.m. Therefore, shadow from the Proposed Project would not occur during the plaza's period of maximum use (11:00 a.m. to 1:00 p.m. for nearby workers' lunch breaks).

The building height increase due to the Proposed Project would result in a net increase of 4.04 percent compared to existing conditions, and 0.84 percent compared to the DCDG-Compliant Massing analyzed in the EIS/EIR. Net new shadow from the Proposed Project would not substantially and adversely affect the public's use and enjoyment of the park. The Proposed Project's shadow impact on Main Street Plaza would be less than significant, and no mitigation measures are necessary.

201 Mission (POPOS)

The 0.31-acre parcel at 201 Mission is a lunch and break space with a surplus of movable seating and dining, buffered from Beale Street by dense planting. The open space at 201 Mission Street is presumed to be used primarily for passive activity by nearby office workers.[28] Given its proximity to high rise office buildings, the open space likely experiences its heaviest use around lunchtime.

The DCDG-Compliant Massing would contribute 825,497 sfh (1.63 percent) of new shading more than 11 months of the year, from late December to mid-December. The daily duration of net new shadow on the park under this scenario would range from less than one minute to a maximum of 6 hours and 45 minutes, with the average daily duration being about 3 hours and 41 minutes. In comparison, the Proposed Project would contribute 948,754 sfh (1.88 percent) of new shading almost nine months of the year, from early January to mid-May and from late July to early December. With the Proposed Project, the daily duration of net new shadow on the park would range from less than one minute to a maximum of 1 hour and 45 minutes, with the average daily duration being about 1 hour and 9 minutes.

Both the DCDG-Compliant Massing and the Proposed Project would shadow the open space in the morning before 9:15 a.m., with shadow from the Proposed Project lasting about 30 minutes longer per day from mid-November until late January. Shadow from the Proposed Project would not occur during the open space's presumed period of maximum use (11:00 a.m. to 1:00 p.m. for nearby workers' lunch breaks).

The building height increase due to the Proposed Project would result in a net increase of 1.88 percent compared to existing conditions, and 0.25 percent compared to the DCDG-Compliant Massing analyzed in the EIS/EIR. Net new shadow from the Proposed Project would not substantially and adversely affect the

[28] Due to an indefinite citywide shelter-in-place order effective March 17, 2020, observations of this open space were not possible at the time that this analysis was prepared.

public's use and enjoyment of the park. The Proposed Project's shadow impact on the 201 Mission open space would be less than significant, and no mitigation measures are necessary.

Salesforce Plaza (POPOS)

Salesforce Plaza, an open hardscape area at the southern corner of Mission and Fremont streets, is framed by Salesforce Tower to the southwest and Salesforce Transit Center to the southeast. Salesforce Plaza is used primarily by pedestrians while en route to Salesforce Transit Center or the high-rise office buildings and businesses in the area. It is also the location of the cable car that ferries pedestrians to the elevated Salesforce Park. The plaza contains a small amount of fixed seating and landscaping in the northern corner of the site, adjacent to the cable car. The use of the plaza for purposes other than pedestrian access to and from the Salesforce Transit Center and Salesforce Park is presumed to be minimal.[29]

The DCDG-Compliant Massing would contribute 7,031 sfh (0.01 percent) of new shading about 9 months of the year, from late January to early March and-mid-March to late September. The daily duration of net new shadow on the park under this scenario would range from less than 1 minute to a maximum of 1 hour and 45 minutes, with the average daily duration being about 53 minutes. In comparison, the Proposed Project would contribute 13,803 sfh (0.02 percent) of new shading about three months of the year, between mid-April and late May as well as mid-July to mid-August. With the Proposed Project, the daily duration of net new shadow on the park would range from less than 1 minute to a maximum of 1 30 minutes, with the average daily duration being about 24 minutes.

Both the DCDG-Compliant Massing and the Proposed Project would shadow the northern third of the plaza in the morning, with shadow from the Proposed Project covering an additional area along the eastern edge of the plaza. Shadow from the Proposed Project would occur on the plaza for fewer days of the year (mid-April to late May and mid-July to mid-August) than shadow from the DCDG-Compliant Massing (late January to early March and mid-March to late September).

The building height increase due to the Proposed Project would result in a net increase of 0.02 percent compared to existing conditions, and 0.01 percent compared to the DCDG-Compliant Massing analyzed in the EIS/EIR. Shadow from the Proposed Project is not anticipated to substantially and adversely affect the use of the plaza for pedestrian access. The Proposed Project's shadow impact on Salesforce Plaza would be less than significant, and no mitigation measures are necessary.

Urban Park (POPOS)

Urban Park, located on the western corner of Howard Street and Main Street, is a new open space, seemingly inspired by traditional Japanese raked-gravel gardens. Based on its design, the park is expected to be used primarily for passive activity by nearby residents and workers.[30]

The DCDG-Compliant Massing would contribute 8,810,597 sfh (11.09 percent) of new shading to Urban Park. New shading would be introduced at the plaza every day of the year. The daily duration of net new shadow on the park under this scenario would range from less than 1 minute to a maximum of 4 hours and 45 minutes, with the average daily duration being about 3 hours and 58 minutes. In

[29] Due to an indefinite citywide shelter-in-place order effective March 17, 2020, observations of this open space were not possible at the time that this analysis was prepared.

[30] Due to an indefinite citywide shelter-in-place order, effective March 17, 2020, observations of this open space were not possible when this analysis was prepared.

comparison, the Proposed Project would contribute 9,501,966 sfh (11.97 percent) of new shading. New shading would be introduced at the plaza every day of the year. With the Proposed Project, the daily duration of net new shadow on the park would range from less than 1 minute to a maximum of 5 hours and 30 minutes, with the average daily duration being about 4 hours and 15 minutes.

Both the DCDG-Compliant Massing and the Proposed Project would shadow the park from the early morning until the early afternoon throughout the year. Compared to shadow from the DCDG-Compliant Massing, shadow from the Proposed Project would be very similar in time of occurrence, duration, and location.

The building height increase due to the Proposed Project would result in a net increase of 0.88 percent compared to the DCDG-Compliant Massing analyzed in the EIS/EIR. Park users who prefer sunlight to shadow would be affected by the net new shadow and most likely would not use the park during the morning and early afternoon. Such individuals would be able to visit other parks and open spaces in the neighborhood that receive more sunlight. This would be the case under both the DCDG-Compliant Massing and the Proposed Project. Since the shadow from the Proposed Project would be very similar in time of occurrence, duration, and location to the shadow from the DCDG-Compliant Massing, the Proposed Project would not result in a more severe shadow impact on Urban Park when compared to the DCDG-Compliant Massing.

50 Beale Street Plaza (POPOS)

This large, square-shaped urban park opens onto Beale Street on its east side. Surrounded on three sides by towers and heavily landscaped with bushes and mature trees, the park generally stays shady. There is ample bench seating but no movable seating. Although crisscrossed by office workers heading to the nearby towers or cutting through the block, the park is generally empty in the evening and on weekends. Based on its design, the park is presumed to be used primarily for passive activity or as a mid-block pedestrian passage by nearby office workers and residents. Given its proximity to high rise office buildings, the park likely experiences its heaviest use around lunchtime.[31]

The DCDG-Compliant Massing would contribute 57,097 sfh (0.08 percent) of new shading about 3 months of the year, from early February to mid-March as well as late September to early November. The daily duration of net new shadow on the park under this scenario would range from less than 1 minute to a maximum of 45 minutes, with the average daily duration being about 30 minutes. In comparison, the Proposed Project would contribute 69,967 sfh (0.10 percent) of new shading approximately 4 months of the year, from early February to mid-March, mid-September to early November, and early December to early January. With the Proposed Project, the daily duration of net new shadow on the park would range from less than 1 minute to a maximum of 45 minutes, with the average daily duration being about 27 minutes.

Like the DCDG-Compliant Massing, the Proposed Project would not cast net new shadow on the plaza after 9:45 a.m. on any day of the year. Therefore, shadow from the Proposed Project would not occur during the plaza's presumed period of maximum use (11:00 a.m. to 1:00 p.m. for nearby workers' lunch breaks).

The building height increase due to the Proposed Project would result in a net increase of 0.10 percent compared to existing conditions, and 0.02 percent compared to the DCDG-Compliant Massing analyzed in

[31] Due to an indefinite citywide shelter-in-place order, effective March 17, 2020, observations of this open space were not possible when this analysis was prepared.

the EIS/EIR. Net new shadow from the Proposed Project would not substantially and adversely affect the public's use and enjoyment of the plaza. The Proposed Project's shadow impact on 50 Beale Street Plaza would be less than significant, and no mitigation measures are necessary.

Future Transbay Block 3 Park

The following discussion is provided for informational purposes only. Since Transbay Block 3 Park is not an existing park, shadow from the Proposed Project could not result in an impact under CEQA.

Transbay Block 3 Park is a proposed 47,885-square-foot (1.10-acre) public park in the Financial District of San Francisco, on portions of Assessor's Block 3739/Lots 002, 006, and 008 (Transbay Block 3). The future park space will occupy land that was used as the temporary Transbay Terminal while the Salesforce Transit Center was being built. The design and programming of this park are still under development and have not yet been finalized.

The DCDG-Compliant Massing would contribute 9,441 sfh (0.01 percent) of new shading approximately four months of the year. The daily duration of net new shadow on the park under this scenario would range from less than 1 minute to a maximum of 1 hour and 30 minutes, with the average daily duration being about 43 minutes. In comparison, the Proposed Project would contribute 81,454 sfh (0.05 percent) of new shading approximately 7 months of the year. With the Proposed Project, the daily duration of net new shadow on the park would range from less than 1 minute to a maximum of 1 hour and 45 minutes, with the average daily duration being about 57 minutes. The building height increase due to the Proposed Project would result in a net increase of 0.04 percent compared to the DCDG-Compliant Massing analyzed in the EIS/EIR.

Both the DCDG-Compliant Massing and the Proposed Project would shadow the northern (Tehama Street) edge of the future park during the late afternoon and early evening. Shadow from the Proposed Project would occur on the future park for more days of the year (mid-March until early October) than shadow from the DCDG-Compliant Massing (mid-March until mid-April, late May until mid-July, late August until early October). Given the limited area along the northern edge of the future park that would be affected, it is anticipated that shadow from the Proposed Project would not substantially and adversely affect the public's use and enjoyment of the future park.