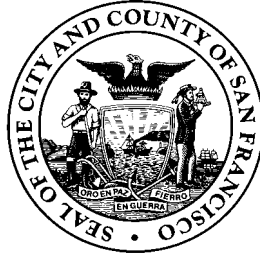


BOARD of SUPERVISORS



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April 30, 2019

**File No. 19437**

Lisa Gibson  
Environmental Review Officer  
Planning Department  
1650 Mission Street, Suite 400  
San Francisco, CA 94103

Dear Ms. Gibson:

On April 23, 2019, the following proposed Charter Amendment and Initiative Ordinance for the November 5, 2019, Election was received by the Board of Supervisors' Rules Committee:

**File No. 190437**

**Charter Amendment (First Draft) to amend the Charter of the City and County of San Francisco to provide for streamlined review of eligible affordable housing and housing for teachers and employees of the San Francisco Unified School District or Community College District by limiting discretionary review by City boards and commissions and providing for Planning Department ministerial review in lieu of approvals by or certain appeals to City boards and commissions; an Initiative Ordinance to make corresponding amendments to the Planning Code and the Business and Tax Regulations Code; and affirming the Planning Department's determination under the California Environmental Quality Act; at an election to be held on November 5, 2019.**

This legislation is being transmitted to you for environmental review.

Angela Calvillo, Clerk of the Board

A handwritten signature in black ink that reads "Victor Young".

By: Victor Young, Assistant Clerk  
Rules Committee

Attachment

c: Devyani Jain, Deputy Environmental Review Officer  
Joy Navarrete, Environmental Planning  
Laura Lynch, Environmental Planning

CEQA Clearance under Planning Department Case  
No. 2019-006081ENV Addendum 5 to Environmental  
Impact Report, San Francisco 2004 and 2009  
Housing Element, (2007.1275E).



# SAN FRANCISCO PLANNING DEPARTMENT

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## Addendum 5 to Environmental Impact Report

*Addendum Date:* June 5, 2019  
*Case No.:* 2019-006081ENV  
*Project Title:* **BOS File No. 190437: Non-Discretionary Review of 100 Percent Affordable Housing and Teacher Housing Projects**  
*EIR:* San Francisco 2004 and 2009 Housing Element, 2007.1275E  
SCL No. 2008102033, certified March 24, 2011, recertified April 24, 2014  
*Project Sponsors:* Mayor London Breed; Supervisors Brown and Safai  
*Sponsor Contact:* Kate Conner, (415) 575-6914, [kate.conner@sfgov.org](mailto:kate.conner@sfgov.org)  
*Lead Agency:* San Francisco Planning Department  
*Staff Contact:* Michael Li, (415) 575-9107, [michael.j.li@sfgov.org](mailto:michael.j.li@sfgov.org)

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### REMARKS

This document is an addendum to the 2004 and 2009 Housing Element Final Environmental Impact Report (“2004 and 2009 Housing Element FEIR” or “FEIR”). Its purpose is to explain and substantiate the Planning Department’s determination that no supplemental or subsequent environmental review is required prior to adoption of proposed legislation to streamline the review process for eligible projects that would provide 100% affordable housing or housing for teachers and employees of the San Francisco Unified School District (“SFUSD”) or Community College District (“modified project”). As described more fully below, the modified project implements the policies and programs of the 2014 Housing Element. The Planning Department has determined that the environmental impacts of the modified project have been adequately identified and analyzed under CEQA in the 2004 and 2009 Housing Element FEIR, and the proposed legislation would not result in any new or more severe environmental impacts than were identified in the FEIR.

### Background

On April 24, 2014, the San Francisco Planning Commission (“Planning Commission”) certified the 2004 and 2009 Housing Element FEIR pursuant to the California Environmental Quality Act (“CEQA”).<sup>1</sup>

On June 17, 2014, the San Francisco Board of Supervisors (“Board”) adopted the 2009 Housing Element as the Housing Element of the *San Francisco General Plan* (“General Plan”).

In response to the proposed 2014 Housing Element, which updated the Data and Needs Analysis of the 2009 Housing Element and added five additional policies, the San Francisco Planning Department

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<sup>1</sup> San Francisco Planning Department, *2004 and 2009 Housing Element Final Environmental Impact Report*, April 24, 2014. Case No. 2007.1275E, <https://sfgov.org/sfplanningarchive/environmental-impact-reports-negative-declarations>, accessed on May 16, 2019. Unless otherwise noted, all documents cited in this report are available for review at the San Francisco Planning Department, 1650 Mission Street, Suite 400, San Francisco, California, as part of Case No. 2019-006081ENV.

("Planning Department") prepared Addendum 1 to the 2004 and 2009 Housing Element FEIR. Based on Addendum 1, issued by the Planning Department on January 22, 2015, the Board found that no additional environmental review was required beyond the review in the FEIR.<sup>2</sup> On April 27, 2015, the Board adopted the 2014 Housing Element.

In response to proposed legislation to amend the locations in which accessory dwelling units ("ADUs") may be constructed, the Planning Department prepared Addendum 2 to the 2004 and 2009 Housing Element FEIR. Based on Addendum 2, issued by the Planning Department on July 14, 2015, the Board found that no additional environmental review was required beyond the review in the FEIR.<sup>3</sup> On September 8, 2015, the Board adopted the proposed legislation allowing the construction of ADUs in Supervisorial Districts 3 and 8.

In response to proposed legislation that would create a program allowing the construction of taller and denser buildings in exchange for a higher number of affordable dwelling units (the "Affordable Housing Bonus Program" or the "AHBP," now known as "HOME-SF"), the Planning Department prepared Addendum 3 to the 2004 and 2009 Housing Element FEIR. The Planning Department issued Addendum 3 on January 14, 2016.<sup>4</sup> On June 6, 2017, the Board adopted the proposed legislation creating the HOME-SF program.

In response to proposed legislation that would allow the construction of ADUs on a citywide basis, the Planning Department prepared Addendum 4 to the 2004 and 2009 Housing Element FEIR.<sup>5</sup> On May 2, 2017, the Board adopted the proposed legislation allowing the construction of ADUs on a citywide basis.

### *San Francisco 2014 Housing Element*

The Housing Element is a component of the *General Plan* and establishes the City's overall housing policies. California State Housing Element law (California Government Code Section 65580 et seq.) requires local jurisdictions to adequately plan for and address the housing needs of all segments of its population in order to attain the region's share of projected statewide housing goals. This law requires local governments to plan for their existing and projected housing needs by facilitating the improvement and development of housing and removing constraints on development opportunities. San Francisco's 2014 Housing Element was required to plan for an existing and projected housing need of 28,869 new dwelling units. The

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<sup>2</sup> San Francisco Planning Department, *Addendum to 2004 and 2009 Housing Element Final Environmental Impact Report, 2014 Housing Element*, January 22, 2015, Case No. 2014.1327E. Available at [http://sfmea.sfplanning.org/2014.1327E\\_Add.pdf](http://sfmea.sfplanning.org/2014.1327E_Add.pdf), accessed on May 10, 2019.

<sup>3</sup> San Francisco Planning Department, *Addendum 2 to 2004 and 2009 Housing Element Final Environmental Impact Report, Accessory Dwelling Units in Supervisorial Districts 3 and 8*, July 14, 2015, Case No. 2015-005350ENV. Available at [http://sfmea.sfplanning.org/2015-005350ENV\\_Addendum%20to%20Housing%20Element%20EIR\\_D3%20and%20D8%20ADU%20Leg%20\(2\).pdf](http://sfmea.sfplanning.org/2015-005350ENV_Addendum%20to%20Housing%20Element%20EIR_D3%20and%20D8%20ADU%20Leg%20(2).pdf), accessed on May 10, 2019.

<sup>4</sup> San Francisco Planning Department, *Addendum 3 to 2004 and 2009 Housing Element Final Environmental Impact Report, Affordable Housing Bonus Program*, January 14, 2016, Cases No. 2014.1304E and 2014-001503GPA. Available at [http://sfmea.sfplanning.org/2014.1304E\\_AHBP\\_Addendum03\\_011416%20Final.pdf](http://sfmea.sfplanning.org/2014.1304E_AHBP_Addendum03_011416%20Final.pdf), accessed on May 10, 2019.

<sup>5</sup> San Francisco Planning Department, *Addendum 4 to 2004 and 2009 Housing Element Final Environmental Impact Report, Construction of Accessory Dwelling Units*, June 15, 2016, Case No. 2016-004042ENV. Available at [http://sfmea.sfplanning.org/2016-004042ENV\\_Addendum.pdf](http://sfmea.sfplanning.org/2016-004042ENV_Addendum.pdf), accessed on May 10, 2019.

2014 Housing Element includes the following objectives and policies related to providing permanently affordable housing and streamlining the review process:

- OBJECTIVE 8: Build public and private sector capacity to support, facilitate, provide and maintain affordable housing.
  - Policy 8.1: Support the production and management of permanently affordable housing.
  - Policy 8.2: Encourage employers located within San Francisco to work together to develop and advocate for housing appropriate for employees.
- OBJECTIVE 10: Ensure a streamlined, yet thorough, and transparent decision-making process.
  - Policy 10.1: Create certainty in the development entitlement process, by providing clear community parameters for development and consistent application of these regulations.
  - Policy 10.2: Implement planning process improvements to both reduce undue project delays and provide clear information to support community review.

## PROPOSED LEGISLATION

On April 23, 2019, Mayor Breed introduced legislation (Board File No. 190437) to the Board that would amend the City Charter, the Planning Code, and the Business and Tax Regulations Code to streamline the review process for eligible projects that would provide 100% affordable housing or housing for teachers and employees of the SFUSD or Community College District by (1) limiting discretionary review by City boards and commissions and (2) providing for ministerial review by the Planning Department in lieu of approvals by or appeals to certain City boards and commissions. The modified project would implement the objectives and policies of the 2014 Housing Element discussed above.

The modified project defines affordable housing as a project where at least two-thirds of the gross building square footage is designated for residential use, which would be entirely restricted as affordable housing, defined to be residential units that are deed-restricted to be affordable to households with an income up to 140% of the unadjusted area median family income (AMI).

Teacher housing is defined to be a project with at least two-thirds of the gross building square footage designated for residential use, of which no less than two-thirds of the residential units would be deed restricted to occupancy by at least one employee of the SFUSD or Community College District. The residential units that are deed-restricted to occupancy by these employees would also be deed-restricted to be affordable to households with an income up to 140% of the unadjusted AMI.

In order to use the streamlined process, a project may not be located on a site that (a) is designated open space under the jurisdiction of the Recreation and Park Department that is used as a public park, (b) is in a zoning district that prohibits dwelling units, (c) is located in an RH-1, RH-1(D), or RH-2 zoning district, or (d) causes any removal or demolition of a designated state or national landmark, or designated City landmark or contributory building in a designated historic district, or a Significant Building designated Category I or II.

The modified project provides that the eligible affordable or teacher housing projects that comply with the Zoning Maps, Height and Bulk Maps and objective standards of the Planning Code, including but not

limited to modifications permitted by Planning Code Sections 206 *et seq.*, any discretionary approval that could be authorized under the Planning Code, and the State Density Bonus Law, would be deemed consistent with the Planning Code and would be considered ministerial actions. If an affordable or teacher housing project would be permitted with a conditional use authorization, such project would be considered a principally permitted use, consistent with the Planning Code, and would not require a conditional use permit or authorization from the Planning Commission.

The proposed legislation requires the Planning Director, in consultation with the Environmental Review Officer, to adopt objective standard measures that would be incorporated, as applicable, into the housing projects. The measures could address, but are not limited to, relevant topics such as archeology, air quality, greenhouse gas emissions, noise, historic resources, water supply, wind, and shadow. The proposed legislation intends to exempt eligible affordable and teacher housing projects from any requirements for discretionary approvals by the City, including but not limited to the Planning Commission, Historic Preservation Commission, Arts Commission, Board of Supervisors, and Board of Appeals.

The modified project would change how eligible projects are reviewed and approved; it would not change zoning controls to allow housing in areas where housing is currently not permitted, would not increase residential density limits, and would not increase height limits.

### **Project Approvals**

The proposed legislation consists of amendments to the City Charter, the Planning Code, and the Business and Tax Regulations Code and requires the Board of Supervisors to vote to submit the amendments to the voters for the November 5, 2019 election.

### **PROJECT SETTING**

San Francisco is a consolidated city and county located on the tip of the San Francisco Peninsula with the Golden Gate Strait to the north, San Francisco Bay to the east, San Mateo County to the south, and the Pacific Ocean to the west. San Francisco has an area of approximately 49 square miles. Although San Francisco is densely developed, there are vacant and underused lots that can be developed or redeveloped. These lots are located throughout San Francisco, and many are currently zoned to allow residential uses.

San Francisco already has several programs that streamline affordable housing. For example, Planning Code Section 206.4 applies to a 100% affordable housing bonus project, which is a housing project that is exclusively affordable, providing housing for households making up to 80% of Area Median Income. The 100% affordable housing bonus program allows for certain objective zoning modifications in association with development bonuses, including a density bonus and height increase, and streamlined review.

Planning Code Section 315 also provides for streamlined review of housing projects that are 100% affordable, which is considered to be housing for households making up to 120% of Area Median Income. These affordable housing projects are considered a principally permitted use and must comply with administrative review procedures provided in Planning Code Section 315. These kinds of affordable housing projects may seek exceptions to Planning Code requirements that may otherwise be available through the Planning Code without a Planning Commission hearing. The Planning Department will grant an exception that is equal to or less than the zoning modifications automatically granted to a 100% affordable housing bonus project in

Planning Code Section 206.4. Any project granted such an exception will be considered to be consistent with the objective controls of the Planning Code.

Planning Code Section 206.6 implements the California Density Bonus Law, for projects that provide on-site affordable housing in compliance with State law. The State Law offers three categories of benefits to incentivize on-site affordable housing - 35% additional density; up to three incentives or concessions (generally, defined as a reduction of development standards, modifications of zoning code requirements, or approval of mixed use zoning); and waivers from any local development standard if needed to construct on-site affordable housing. The amount of the density bonus and the number of incentives and concessions depends on the amount and level of affordability of the affordable units in the project.

State law has also provided for streamlined review of certain kinds of affordable housing projects. Senate Bill (SB) 35 provides for streamlined, non-discretionary review of certain kinds of eligible residential projects that are 50% affordable housing, which is considered to be for households making up to 80% of the Area Median Income. SB 35 requires the City to streamline the approval of eligible housing projects by providing a ministerial approval process, removing the requirement for CEQA analysis, and removing the requirement for Conditional Use Authorization or other similar discretionary entitlements granted by the Planning Commission. Similarly, Assembly Bill (AB) 2162 requires that supportive housing must be a use that is permitted by right in zones where multifamily and mixed-use development is permitted. AB 2162 requires local entities to streamline the approval of housing projects containing a minimum amount of supportive housing by providing a ministerial approval process, removing the requirement for CEQA analysis, and removing the requirement for Conditional Use Authorization or other similar discretionary entitlements granted by a local Planning Commission.

## **ANALYSIS OF POTENTIAL ENVIRONMENTAL EFFECTS**

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

CEQA Guidelines Section 15164 provides for the use of an addendum to document the basis of a lead agency’s decision not to require a Subsequent or Supplemental EIR for a change to a project that has been analyzed in a certified EIR. The lead agency’s decision to use an addendum must be supported by substantial evidence that the conditions that would trigger the preparation of a Subsequent EIR, as provided in CEQA Guidelines Section 15162, are not present.

The modified project, which would streamline the review process for affordable and teacher housing projects, would not result in any new significant environmental impacts, substantially increase the severity of previously identified impacts, or necessitate implementation of additional or considerably different mitigation measures than those identified in the FEIR or the previous addenda. The impacts associated with the modified project would be substantially the same as those disclosed in the FEIR, and thus no supplemental or subsequent EIR is required. In addition, any changes to the rate and types of housing applications and review of such applications in San Francisco would not be substantially different from the

local programs that are already established, as well as the streamlined review required by SB 35 and AB 2162. The proposed legislation expands the definition of affordable housing up to households earning 140% of local AMI, but this difference in AMI is not expected to lead to any different kinds of impacts. The following discussion provides further explanation for this conclusion.

### **Environmental Impacts of the 2004 and 2009 Housing Element FEIR**

The 2009 Housing Element adopted policies that generally encouraged housing and higher density housing along transit lines and in proximity to other infrastructure and neighborhood services, such as open space and childcare providers. The 2009 Housing Element policies also encouraged higher density through a community planning process and, for affordable housing projects, promoted the construction of multifamily housing.

The 2004 and 2009 Housing Element FEIR identified less-than-significant environmental impacts for the following environmental topics:

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

Detailed discussions of these less-than-significant impacts were included in Addendum 3 and Addendum 4 to the 2004 and 2009 Housing Element FEIR, and the discussions and findings from those previous addenda are incorporated herein by reference.

The FEIR found that adoption of the 2009 Housing Element would potentially result in significant environmental impacts on the transit network that could not be mitigated to less-than-significant levels with implementation of feasible mitigation measures.

The FEIR found that significant impacts related to encouraging new residential development along streets with noise levels above 75 dBA  $L_{dn}$  could be avoided or reduced to less-than-significant levels with mitigation, and a mitigation measure addressing this issue (Mitigation Measure M-NO-1: Interior and Exterior Noise ) was incorporated into the adopted Housing Element as an implementation measure.<sup>6, 7</sup> Mitigation Measure M-NO-1 requires a noise analysis to be conducted for any new residential development located along a street with ambient noise levels exceeding 75 dBA  $L_{dn}$  in order to demonstrate that the noise

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<sup>6</sup> The standard method used to quantify environmental noise involves evaluating the sound with an adjustment to reflect the fact that human hearing is less sensitive to low-frequency sound than to mid- and high-frequency sound. This measurement adjustment is called "A" weighting, and the data are reported in A-weighted decibels (dBA).

<sup>7</sup> The  $L_{dn}$  is the  $L_{eq}$ , or Energy Equivalent Level, of the A-weighted noise level over a 24-hour period, obtained after the addition of 10 dB to sound levels during nighttime hours (10:00 p.m. to 7:00 a.m). The  $L_{eq}$  is the level of a steady noise which would have the same energy as the fluctuating noise level integrated over the time period of interest.

standards set forth in Title 24 can be met. In addition, any required open space for a new residential development must be protected to the maximum extent feasible from ambient noise that could be annoying or disruptive to users of the open space. Mitigation Measure M-NO-1 was adopted as Implementation Measures 17 and 18 in both the 2009 Housing Element and the 2014 Housing Element.

The policies in the 2014 Housing Element were substantially the same as those in the 2009 Housing Element, and the adoption of the 2014 Housing Element did not change the conclusions in the FEIR.

### *Changed Circumstances Since the Certification of the FEIR*

Since the certification of the FEIR, a number of revisions have been made to the Planning Code, *General Plan*, and other city policies and regulations (e.g., the Inclusionary Housing Program, Standards for Bird-Safe Buildings, the Transportation Sustainability Fee) related to housing and development in San Francisco. Most changes to the Planning Code and other documents can be found on the Planning Department's website: <http://sf-planning.org/planning-code-change-summaries>. Those changes were independent from the adoption of the Housing Element and have undergone independent review under CEQA. The revisions primarily pertain to neighborhood-specific issues, and none of them would result in changes that substantially deviate from the overarching goals and objectives that were articulated in the 2009 or 2014 Housing Element (such as directing growth to certain areas of the City, promoting preservation of residential buildings, etc.) in a way that could render the conclusions in the FEIR invalid or inaccurate. These revisions to the regulatory environment also would not be expected to increase the severity of impacts discussed in the FEIR. Furthermore, no new information has emerged that would materially change the analyses or conclusions set forth in the FEIR. Any additional draft amendments proposed for adoption, but not yet adopted, would be reviewed for environmental impacts prior to adoption.

### *Changes to Housing Projections*

The FEIR contains population and housing projections that have since been updated. As reported in the 2014 Housing Element, the 2012 American Community Survey estimated San Francisco's population to be about 807,755.<sup>8</sup> The Association of Bay Area Governments projects continued population growth to 981,800 by 2030 or an overall increase of about 174,045 people who will need to be housed over the next 18 years.<sup>9</sup> In comparison, the 2009 Housing Element projected San Francisco's population at 934,000 by 2030. Household growth, an approximation of the demand for housing, currently indicates a need for some 72,530 new units in the 18 years from 2012 to 2030. As with the 2009 and 2014 Housing Elements, the modified project would not change the population and housing projections, because those projections are due to and influenced by births, deaths, migration rates, and employment growth. Rather, the modified project would streamline the review process for certain types of housing units (100% affordable housing and housing for teachers and employees of the SFUSD or Community College District) that would be constructed to meet demand.

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<sup>8</sup> San Francisco Planning Department, *2014 Housing Element, Part I*, p. I.4.

<sup>9</sup> Association of Bay Area Governments, *Projections 2013*, p. 75.



## **Environmental Impacts of the Modified Project**

As discussed above, the modified project would change how a certain group of eligible projects are reviewed and approved. Streamlining the review process could result in eligible projects being constructed and occupied more quickly than under existing procedures.

The modified project would not change zoning controls to allow housing in areas where housing is currently not permitted, would not increase residential density limits, and would not increase height limits. For these reasons, the modified project would not result in the construction of housing units in excess of the number of housing units analyzed in the FEIR and the previous addenda. Therefore, the environmental impacts of housing proposed under the modified project have already been analyzed in the FEIR and the previous addenda. The modified project would not result in any new significant environmental impacts, substantially increase the severity of previously identified impacts, or necessitate implementation of additional or considerably different mitigation measures than those identified in the FEIR or the previous addenda.

Since the impacts of the modified project would not be greater than the impacts of the HOME-SF and citywide ADU legislation, the analysis conducted as part of previous addenda are applicable to the modified project. Detailed discussions of the environmental impacts of constructing housing under HOME-SF and constructing ADUs on a citywide basis were included in Addendum 3 and Addendum 4 to the 2004 and 2009 Housing Element FEIR, respectively. The discussions and findings from those previous addenda are applicable to the modified project and are incorporated herein by reference.

### ***Applicability of FEIR Noise Mitigation Measure***

As discussed above, the 2004 and 2009 Housing Element FEIR identified Mitigation Measure M-NO-1: Interior and Exterior Noise, to mitigate the potentially significant impact related to interior and exterior noise to a less-than-significant level. Mitigation Measure M-NO-1 requires a noise analysis to be conducted for any new residential development located along a street with ambient noise levels exceeding 75 dBA L<sub>dn</sub> in order to demonstrate that the noise standards set forth in Title 24 can be met. In addition, any required open space for a new residential development must be protected to the maximum extent feasible from ambient noise that could be annoying or disruptive to users of the open space.

Housing proposed under the modified project would be required to comply with City requirements such as the noise standards set forth in Title 24 of the California Code of Regulations as well as the provisions of the San Francisco Noise Ordinance. In addition, CEQA does not generally require an agency to consider the effects of existing environmental conditions on a proposed project's future users or residents except where a project or its residents may exacerbate existing environmental hazards. The addition of housing under the modified project is not expected to exacerbate existing environmental hazards. Residential uses generally do not generate excessive levels of noise like some types of commercial or industrial uses (e.g., nightclubs or auto repair facilities). The impacts related to noise were already analyzed in the FEIR and previous addenda, and the modified project would not result in any new significant environmental impacts or substantially increase the severity of previously identified impacts related to noise. For these reasons, FEIR Mitigation Measure M-NO-1 is not applicable to the modified project.

*New Topics in the Environmental Checklist Form*

At the time of the preparation of the FEIR, the topics of forest resources and wildfire were not part of the Environmental Checklist Form (CEQA Guidelines, Appendix G). For this reason, the FEIR did not analyze impacts related to forest resources or wildfire.

In 2010, the topic of forest resources was added to the Environmental Checklist Form. San Francisco does not contain forest land or timberland as defined in Public Resources Code Section 12220(g) and Public Resources Code Section 4526, respectively. The modified project would not convert forest land or timberland to non-forest use and would not conflict with existing zoning related to forest use. For these reasons, the modified project would have no impact on forest resources, would not result in new significant impacts beyond those identified in the FEIR, and would not require new mitigation measures.

In 2019, the topic of wildfire was added to the Environmental Checklist Form. According to the California Department of Forestry and Fire Protection, San Francisco is not in or near a state responsibility area or a local responsibility area that is classified as a Very High Fire Hazard Severity Zone.<sup>10</sup> For this reason, the modified project would have no impact related to wildfire, would not result in new significant impacts beyond those identified in the FEIR, and would not require new mitigation measures.

**MITIGATION MEASURES**


As discussed above, FEIR Mitigation Measure M-NO-1 is not applicable to the modified project. No other FEIR mitigation measures are applicable, and no new mitigation measures have been identified in this Addendum 5.

**CONCLUSION**

Based on the foregoing, it is concluded that the analyses conducted and the conclusions reached in the Final EIR certified on April 24, 2014 remain valid. The modified project would not cause new significant impacts not identified in the FEIR, and no new mitigation measures would be necessary to reduce significant impacts. No changes have occurred with respect to circumstances surrounding the modified project that would cause significant environmental impacts to which the modified project would contribute considerably, and no new information has become available that shows that the modified 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.

DATE 6/5/2019

  
\_\_\_\_\_  
Lisa Gibson, Environmental Review Officer  
for John Rahaim, Director of Planning

<sup>10</sup> California Department of Forestry and Fire Protection, *Fire Hazard Severity Zones in State Responsibility Areas*, available at [http://frap.fire.ca.gov/webdata/maps/statewide/fhszs\\_map.pdf](http://frap.fire.ca.gov/webdata/maps/statewide/fhszs_map.pdf), accessed on May 24, 2019, and *Draft Fire Hazard Severity Zones in Local Responsibility Areas*, available at [http://frap.fire.ca.gov/webdata/maps/statewide/fhszl06\\_1\\_map.pdf](http://frap.fire.ca.gov/webdata/maps/statewide/fhszl06_1_map.pdf), accessed on May 24, 2019.