3333 CALIFORNIA STREET MIXED-USE PROJECT

DRAFT ENVIRONMENTAL IMPACT REPORT
VOLUME 1

CITY AND COUNTY OF SAN FRANCISCO
PLANNING DEPARTMENT: CASE NO. 2015-014028ENV
STATE CLEARINGHOUSE NO. 2017092053

DRAFT EIR PUBLICATION DATE: NOVEMBER 7, 2018
DRAFT EIR PUBLIC HEARING DATE: DECEMBER 13, 2018
DRAFT EIR PUBLIC COMMENT PERIOD: NOVEMBER 8, 2018 - DECEMBER 24, 2018

WRITTEN COMMENTS SHOULD REFERENCE THE CASE NO. AND BE SENT TO:
Kei Zushi, EIR Coordinator
San Francisco Planning Department
1650 Mission Street, Suite 400
San Francisco, CA 94103
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1650 Mission Street, Suite 400 • San Francisco, CA 94103 • Fax (415) 558-6409

NOTICE OF PUBLIC HEARING
AND AVAILABILITY OF A DRAFT ENVIRONMENTAL IMPACT REPORT

Hearing Date:	**December 13, 2018**
Time:	**Not before 1:00 PM**
Location:	**City Hall, 1 Dr. Carlton B. Goodlett Place, Room 400**
Case Type:	**Environmental (Draft Environmental Impact Report)**
Hearing Body:	**Planning Commission**

PROPERTY INFORMATION

Project Address:	3333 California Street
Cross Street(s):	California Street, Presidio Avenue, Masonic Avenue, Euclid Avenue, Laurel Street, & Mayfair Drive
Block /Lot No.:	1032/003
Zoning District(s):	Residential, Mixed, Low Density [RM-1] District 40-X Height and Bulk District
Plan Area:	Not applicable

APPLICATION INFORMATION

Case No.:	2015-014028ENV
Building Permit:	Not filed yet
Applicant/Agent:	Laurel Heights Partners, Don Bragg
Telephone:	(415) 857-9324
E-Mail:	dbragg@pradogroup.com#

PROJECT DESCRIPTION

The San Francisco Planning Department has prepared a draft environmental impact report (Draft EIR) in connection with this mixed-use project.

The project site is an approximately 10.25-acre parcel in San Francisco's Presidio Heights neighborhood. The proposed project would demolish the existing annex building, surface parking lots, and circular garage ramp structures. Also, the existing four-story office building, which has been determined to be an historic resource, would be partially demolished and divided into two separate buildings, vertically expanded to include new levels (proposed building heights of 80 and 92 feet), and adapted for residential use. Thirteen new buildings ranging in height from 37 to 45 feet would be constructed along the perimeter of the site: three multi-story buildings (residential, office, child care, and ground-floor retail uses) along California Street between Laurel Street and Presidio Avenue; a single multi-story building (residential uses) along Masonic Avenue; a single multi-story building (residential and ground-floor retail uses) near the intersection of Euclid and Masonic avenues; seven multi-story townhomes along Laurel Street; and a multi-story residential building near the intersection of Laurel Street and Mayfair Drive. Overall, the proposed project would include 558 dwelling units within 824,691 gross square feet of residential floor area; 49,999 gross square feet of office floor area; 54,117 gross square feet of retail floor area; a 14,690-gross-square-foot child care center; 428,773 gross square feet of parking with 896 parking spaces; and 236,000 square feet of open areas. Parking would be provided in four below-grade parking garages and six individual, two-car parking garages. New public pedestrian walkways are proposed through the site in a north-south direction between California Street and the intersection of Masonic and Euclid avenues approximately along the line of Walnut Street, and in an east-west direction between Laurel Street and Presidio Avenue along the line of Mayfair Drive.

A project variant that would replace the office space in the multi-story building along California Street between Walnut Street and Presidio Avenue with residential uses, would add three new residential floors (proposed building height of 67 feet), and would reduce the retail space is also being considered. Under the project variant there would be 186 additional residential units, for a total of 744 residential units within 978,611 gross square feet of residential floor area; no office space; 48,593 gross square feet of retail floor area; a 14,650-gross-square-foot child care center; 435,133 gross square feet of parking with 971 parking spaces; and 236,000 square feet of open areas on the project site.

Anticipated approvals required for the proposed project or project variant include the following: planning code and zoning map amendments; Special Use District including modification/waiver of Planning Commission Resolution 4109; conditional use authorization/planned unit development; development agreement, office allocation, and sidewalk widening legislation, among others listed in the Draft EIR project description.

The project site was included on the following list compiled pursuant to Section 65962.5 of the California Government Code: State Water Resources Control Board Leaking Underground Storage Tank Sites (GeoTracker ID T0607501246) on February 24, 2003 (GeoTracker website accessed October 17, 2018).

DRAFT EIR: The Draft EIR finds that the proposed 3333 California Street Mixed-Use Project would result in the following significant and unavoidable project-level environmental impacts with mitigation: historical architectural resources; transportation (transit), and construction noise. The Draft EIR provides a detailed project description, an analysis of the physical environmental effects of the project, and identification of feasible mitigation measures and alternatives that would avoid or lessen the severity of impacts. It is available for public review and comment on the Planning Department's website at http://www.sf-planning.org/sfceqadocs.

The purpose of the public hearing is for the Planning Commission and Department staff to receive comments on the adequacy of the EIR. The Planning Commission will not respond to any of the comments or take action on the project at this hearing. Certification of the Final EIR would take place at a later hearing. Call 415-558-6422 the week of the public hearing for a recorded message giving a more specific time for the hearing. Contact the planner below if you wish to be on the mailing list for future notices.

In addition, there will be a public hearing before the Historic Preservation Commission on Wednesday, December 5, 2018 at 12:30 p.m. or later in order for the Historic Preservation Commission to provide its comments on the Draft EIR.

Public comments on the Draft EIR will be accepted from November 8, 2018 to 5:00 p.m. on December 24, 2018.

NOTE: The Project Sponsor has applied to the Governor of the State of California to proceed as an Environmental Leadership Development Project under Public Resources Code Chapter 6.5 (commencing with section 21178), which provides, among other things, that any judicial action challenging the certification of the EIR or the approval of the project described in the EIR is subject to the procedures set forth in sections 21185 to 21186, inclusive, of the Public Resources Code. In accordance with Public Resources Code section 21186(a) and (b), documents and other materials placed in the record of proceedings can be found at *www.ab900record.com/3333cal*. If the Governor certifies this project as an Environmental Leadership Development Project, additional notice will be separately provided regarding such certification, in accordance with the requirements of the Public Resources Code.

FOR MORE INFORMATION OR TO SUBMIT COMMENTS ON THE EIR, PLEASE CONTACT:

Planner: Kei Zushi   Telephone: (415) 575-9038   E-Mail: CPC.3333CaliforniaEIR@sfgov.org

GENERAL INFORMATION ABOUT PROCEDURES

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

Only commenters on the Draft EIR will be permitted to file an appeal of the certification of the Final EIR to the Board of Supervisors.

CDs and paper copies of the Draft EIR are available at the Planning Information Center (PIC) counter on the first floor of 1660 Mission Street, San Francisco, and referenced materials are available for review by appointment (call the planner listed below). Hard copies are also available at the Main Library and Presidio Branch Library for review at the library. Written comments should be addressed to Kei Zushi, EIR Coordinator, San Francisco Planning Department, 1650 Mission Street, Suite 400, San Francisco, CA 94103, or emailed to **CPC.3333CaliforniaEIR@sfgov.org**. Comments received at the public hearing and in writing will be responded to in a Draft EIR Responses to Comments document.

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TABLE OF CONTENTS

3333 California Street Mixed-Use Project
Draft Environmental Impact Report

VOLUME 1

LIST OF FIGURES

LIST OF TABLES

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LIST OF ACRONYMS AND ABBREVIATIONS

ABAG	Association of Bay Area Governments
AC Transit	Alameda-Contra Costa Transit
ADT	Average Daily Traffic
APEZ	Air Pollutant Exposure Zones
AQI	Air Quality Index
BAAQMD	Bay Area Air Quality Management District
BART	Bay Area Rapid Transit
California Register	California Register of Historical Resources
Caltrans	Californian Department of Transportation
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resources Board
CEQA	California Environmental Quality Act
CO	carbon monoxide
CO2e	carbon dioxide equivalents
CPMC	California Pacific Medical Center
dB	decibel
dBA	decibel a-weighted
DBI	Department of Building Inspection
DEPH	diethylhexyl phthalate
DPM	diesel particulate matter
EIR	Environmental Impact Report
ERO	Environmental Review Officer
FAR	floor area ratio
FCC	Federal Communications Commission
FFIC	Fireman's Fund Insurance Company
GGT	Golden Gate Transit
GHG	greenhouse gases
HABS/HALS	Historic American Buildings/Historic American Landscape Survey
HMUPA	Hazardous Materials Unified Program Agency
HPC	Historic Preservation Commission
HRE	Historic Resource Evaluation
HRER	Historic Resource Evaluation Response
HVAC	heating, ventilation, and air conditioning
I-80	Interstate 80
in/sec	inches per second
JCCSF	Jewish Community Center of San Francisco
LEED	Leadership in Energy and Environmental Design
LOS	Level of Service
LT	Long-Term
MMRP	Mitigation Monitoring and Report Program
mph	miles per hour
MTC	Metropolitan Transportation Commission
Muni	San Francisco Municipal Railway
National Register	National Register of Historic Places
NOP	Notice of Preparation
NO_X	oxides of nitrogen
NO_2	nitrogen dioxide

NPDES	National Pollutant Discharge Elimination System
NPS	National Park Service
OPR	Office of Planning and Research
OSHA	Occupational Safety and Health Administration
O_3	ozone
Pb	lead
PCBs	polychlorinated biphenyls
PG&E	Pacific Gas & Electricity
PM	particulate matter
PM_{10}	PM composed of particulates that are 10 microns in diameter or less
$PM_{2.5}$	PM composed of particulates that are 2.5 microns in diameter or less
ppm	parts per million
PPV	peak particle velocity
ROG	reactive organic gases
ROSE	Recreational and Open Space Element
RWQCB	Regional Water Quality Control Board
Samtrans	San Mateo County Transit
SB	Senate Bill
SFMTA	San Francisco Municipal Transportation Agency
SFPUC	San Francisco Public Utilities Commission
SHPO	State Historic Preservation Office
SO_2	sulfur dioxide
SUD	Special Use District
TACs	toxic air contaminants
TASC	Transportation Advisory Staff Committee
TAZ	transportation analysis zone
TDM	Transportation Demand Management
TNC	transportation network companies
TOG	total organic gases
UC	University of California
UCSF	University of California, San Francisco
U.S.C.	United States Code
U.S. EPA	U.S. Environmental Protection Agency
U.S. 101	U.S. Highway 101
VMT	vehicle miles traveled
VOCs	volatile organic compounds
WETA	Water Energy Transportation Authority
$\mu g/m^3$	micrograms per cubic meter

SUMMARY

This Summary chapter is intended to highlight major areas of importance in the environmental analysis as required by section 15123 of the California Environmental Quality Act (CEQA) Guidelines. This chapter briefly summarizes the 3333 California Street Mixed-Use Project (referred to in this environmental impact report [EIR] as "the proposed project") and the Walnut Building Variant (referred to in this EIR as "the project variant"). Following the synopsis of the proposed project and its project variant, a summary table presents the environmental impacts of the proposed project and its project variant identified in the EIR by topic and the mitigation measures identified to reduce or lessen significant impacts. Improvement measures, which are not required to mitigate significant impacts but would further reduce the magnitude of less-than-significant effects, are also identified. Significant impacts identified in the initial study prepared for the proposed project and project variant are listed in a separate summary table, along with the mitigation measures that would reduce them to less-than-significant levels. Following these summary tables is a description of the alternatives to the proposed project and project variant that are addressed in this EIR and tables that compare the characteristics and environmental impacts of those alternatives with those of the proposed project and project variant as well as other project alternatives. The chapter concludes with a summary of environmental issues to be resolved and areas of known controversy.

Table S.1: Summary of Impacts of Proposed Project or Project Variant Identified in the EIR, beginning on p. S.6, provides an overview of the following:

- Environmental impacts with the potential to occur as a result of the proposed project or project variant;
- The level of significance of the environmental impacts before implementation of any applicable mitigation measures;
- Mitigation measures that would avoid or reduce significant environmental impacts;
- Improvement measures that would reduce less-than-significant impacts; and
- The level of significance for each impact after the mitigation measures are implemented.

S.1 PROJECT SYNOPSIS

The project site is an approximately 10.25-acre parcel in San Francisco's Presidio Heights neighborhood. The project sponsor, Laurel Heights Partners, LLC, owns the site and leases it to the Regents of the University of California, which uses the site for its University of California, San Francisco (UCSF) Laurel Heights Campus. Prior to the project sponsor's recent acquisition of fee title to the site, the project sponsor had entered into a 99-year pre-paid ground lease with the Regents in 2014. The campus contains a four-story, 455,000-gross-square-foot office building (including a 93,000-gross-square-foot, three-level, partially below-grade parking garage) at the center of the site; a one-story, 14,000-gross-square-foot annex building at the corner of California and Laurel streets; three surface parking lots; and landscaping or landscaped open space. Current uses on the campus are office, research, laboratory, child care, and parking. UCSF is in the process of shifting its uses to other campus locations in the city. The independently operated child care center would also be relocated, and the site would be completely vacated prior to the onset of any construction activities. UCSF's closure of the laboratory uses and the handling and disposal of all associated hazardous materials that are currently stored on-site would be conducted in accordance with all local, state and federal regulations as administered through the San Francisco and California departments of public health and as outlined in the UCSF Environmental Health and Safety Plan.[1]

The project sponsor proposes a mixed-use project for the 3333 California Street site. The existing annex building, surface parking lots, and circular garage ramp structures would be demolished. The existing office building would be partially demolished and divided into two separate buildings, expanded to include two to three new levels, and adapted for residential use. The proposed project also includes the construction of thirteen new residential and mixed-use buildings in different locations around the site. Overall, the proposed project would include 558 dwelling units within 824,691 gross square feet of residential floor area; 49,999 gross square feet of office floor area; 54,117 gross square feet of retail floor area; a 14,690-gross-square-foot daycare center; 428,773 gross square feet of parking with 896 parking spaces; and 236,000 square feet of open areas.

A total of 896 parking spaces would be provided in four below-grade parking garages and in six two-car parking garages serving a row of duplexes along Laurel Street, 353 more than are on the project site now and including replacing the 60 existing public parking spaces. New public pedestrian walkways would cross the site in a north-south direction between California Street and the intersection of Masonic and Euclid avenues approximately along the line of Walnut Street and in an east-west direction between Laurel Street and Presidio Avenue along the line of Mayfair Drive. The proposed project would be constructed over an approximately 7- to 15-year period in four phases. A preliminary phasing and construction program for a seven-year construction timeline that includes construction and site occupancy overlaps has been developed for purposes of evaluating project impacts; however, the order of the construction phasing may change.

A project variant is being considered that would change the uses and height of the proposed Walnut Building. With the variant, the building's proposed office space would be replaced with residential uses, three new residential floors would be added (for a total height of 67 feet), and the retail space and the daycare center space would be reduced. Overall, with the variant there would be 186 additional residential units, for a total of 744 residential units within 978,611 gross square feet of residential floor area; no office space; 48,593 gross square feet of retail floor area;

[1] University of California, San Francisco (UCSF) Office of Environmental Health and Safety (EHS), UCSF EHS Process for Decommissioning Facilities, September 17, 2018.

a 14,650-gross-square-foot child care center; and 435,133 gross square feet of parking with 970 parking spaces. The amount of space devoted to open areas would be the same as under the proposed project. The project variant would be developed under the same seven-year, four-phase construction program as the proposed project.

S.2 SUMMARY OF IMPACTS, MITIGATION MEASURES, AND IMPROVEMENT MEASURES

The Planning Department published a Notice of Preparation (NOP) of an Environmental Impact Report and Notice of Public Scoping Meeting on September 20, 2017, announcing its intent to prepare and distribute an EIR (the NOP is presented as EIR Appendix A). On April 25, 2018, the planning department published an initial study announcing its intent to prepare and distribute a focused EIR (the initial study is presented as EIR Appendix B). The initial study found that the proposed project or project variant would have potentially significant impacts in the areas of Cultural Resources (historic architectural resources), Transportation and Circulation, Noise and Vibration, and Air Quality. It also found that the proposed project's or project variant's impacts on other environmental topics (Land Use and Planning, Population and Housing, Cultural Resources (archeological resources, human remains, and tribal cultural resources), 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, and Agriculture and Forestry Resources) would either be less than significant or less than significant with mitigation, or that the proposed project or project variant would have no impact. Thus, topics analyzed in this EIR are Cultural Resources (Historic Architectural Resources), Transportation and Circulation, Noise and Vibration, and Air Quality.

All impacts of the proposed project or project variant and associated mitigation measures and improvement measures identified in this EIR are summarized in Table S.1. These impacts are listed in the same order as they appear in the text of Chapter 4, Environmental Setting and Impacts, of this EIR. For the topics evaluated in the EIR, the levels of significance of impacts before and after implementation of applicable mitigation measures are identified as:

- **No Impact** – No adverse changes (or impacts) to the environment are expected.
- **Less Than Significant** – Impact that does not exceed the defined significance criteria or would be eliminated or reduced to a less-than-significant level through compliance with existing local, state, and federal laws and regulations.
- **Less Than Significant with Mitigation** – Impact that is reduced to a less-than-significant level through implementation of the identified mitigation measure(s).
- **Significant and Unavoidable with Mitigation** – Impact that exceeds the defined significance criteria and can be reduced through compliance with existing local, state, and federal laws and regulations and/or implementation of all feasible mitigation measures, but cannot be reduced to a less-than-significant level.

- **Significant and Unavoidable** – Impact that exceeds the defined significance criteria and cannot be eliminated or reduced to a less-than-significant level through compliance with existing local, state, and federal laws and regulations and for which there are no feasible mitigation measures.

Where applicable, Table S.1 identifies project revisions or conditions, expressed as mitigation measures that would reduce the identified impact(s) to less-than-significant levels. The impact's level of significance after implementation of the required mitigation measure is provided in the column labeled "Level of Significance after Mitigation." All mitigation measures and improvement measures that are applicable to the proposed project are also applicable to the project variant.

Table S.1 should not be relied upon for a thorough understanding of the proposed project or its variant and their associated impacts and mitigation needs; it is presented for the reader as an overview of impacts, mitigation measures, and improvement measures of the proposed project and project variant. Please see the relevant environmental topic sections in Chapter 4, Environmental Setting and Impacts, of this EIR and the initial study, Section E, Evaluation of Environmental Effects (EIR Appendix B) for a thorough discussion and analysis of project level and cumulative environmental impacts and the mitigation measures identified to address those impacts, as well as the basis for any proposed improvement measures.

As described below in Table S.1, this EIR identifies three significant and unavoidable impacts with mitigation related to historic architectural resources, transportation and circulation, and noise and vibration. The proposed project or project variant would have significant and unavoidable impacts with mitigation because it would:

- Materially alter, in an adverse manner, the physical characteristics of the 3333 California Street Midcentury Modern-designed corporate campus that justify its inclusion in the California Register of Historic Resources;
- Result in an adverse transit capacity impact on San Francisco Municipal Railway (Muni) route 43 Masonic during the weekday a.m. peak hour under baseline plus project conditions; and
- Expose people to a substantial temporary or periodic increase in ambient noise levels along Euclid Avenue, Laurel Street, and California Street and on site after occupancy of the first phase of the four-phase construction program.

The proposed project or project variant would also result in a significant transportation-related impact related to vehicle miles traveled (VMT); however, this impact would be reduced with mitigation. All project impacts discussed in this EIR are identified in Table S.1 for the proposed project and project variant, with mitigation measures that would reduce significant impacts to less-than-significant levels, where feasible. Table S.1 also identifies improvement measures that could be implemented by the project sponsor to further reduce the less-than-significant impacts of the proposed project or project variant.

The initial study identified topics that were determined not to apply to the proposed project or project variant and topics where the proposed project or project variant would have no impact, a less-than-significant impact, or an impact that would be less-than-significant with mitigation. For significant impacts, mitigation measures are identified that would reduce these impacts to a less-than-significant level. As shown in Table S.2: Summary of Significant Impacts of Proposed Project or Project Variant Identified in the Initial Study (EIR Appendix B), beginning on p. S.27, the initial study identified five significant impacts related to cultural resources (archeological resources, human, remains, tribal cultural resources), biological resources, and geology and soils that would be reduced to less-than-significant levels with implementation of the mitigation measures identified.

Table S.1: Summary of Impacts of Proposed Project or Project Variant Identified in the EIR

Impact	Level of Significance before Mitigation	Mitigation and Improvement Measures	Level of Significance after Mitigation
Legend: NI = No Impact; LTS = Less than significant or negligible impact, no mitigation required; S = Significant; SM = Significant but mitigable; SU = Significant and unavoidable adverse impact, no feasible mitigation; SUM = Significant and unavoidable impact after mitigation; NA = Not Applicable			
Section 4.B, Cultural Resources (Historic Architectural Resources)			
CR-1: The proposed project or project variant would cause a substantial adverse change in the significance of a historical resource as defined in section 15064.5 of the CEQA Guidelines.	S	**Mitigation Measure M-CR-1a: Documentation of Historical Resource** Prior to issuance of demolition or site permits, the project sponsor shall undertake Historic American Building/Historic American Landscape Survey-like (HABS/HALS-like) documentation of the building and associated landscape features. The documentation shall be undertaken by a professional who meets the Secretary of the Interior's Professional Qualifications Standards for Architectural History, History, or Architecture (as appropriate) to prepare written and photographic documentation of 3333 California Street. The specific scope of the documentation shall be reviewed and approved by the Planning Department but shall include the following elements: **Measured Drawings** – A set of measured drawings shall be prepared that depict the existing size, scale, and dimension of the historic resource. Planning Department Preservation staff will accept the original architectural drawings or an as-built set of architectural drawings (e.g., plans, sections, elevations). Planning Department Preservation staff will assist the consultant in determining the appropriate level of measured drawings; **Historic American Buildings/Historic American Landscape Survey-Level Photographs** – Either Historic American Buildings/Historic American Landscape Survey (HABS/HALS) standard large-format or digital photography shall be used. The scope of the digital photographs shall be reviewed by Planning Department Preservation staff for concurrence, and all digital photography shall be conducted according to the latest National Park Service (NPS) standards. The photography shall be undertaken by a qualified professional with demonstrated experience in HABS/HALS photography. Photograph views for the data set shall include contextual views; views of each side of the building and interior views, including any original interior features, where possible; oblique views of the building; and detail views of character-defining features, including landscape elements.	SUM

Impact	Level of Significance before Mitigation	Mitigation and Improvement Measures	Level of Significance after Mitigation
Legend: NI = No Impact; LTS = Less than significant or negligible impact, no mitigation required; S = Significant; SM = Significant but mitigable; SU = Significant and unavoidable adverse impact, no feasible mitigation; SUM = Significant and unavoidable impact after mitigation; NA = Not Applicable			
		All views shall be referenced on a photographic key. This photographic key shall be on a map of the property and shall show the photograph number with an arrow to indicate the direction of the view. Historic photographs shall also be collected, reproduced, and included in the data set. **HABS/HALS Historical Report** – A written historical narrative and report shall be provided in accordance with the HABS/HALS Historical Report Guidelines. The written history shall follow an outline format that begins with a statement of significance supported by the development of the architectural and historical context in which the structure was built and subsequently evolved. The report shall also include architectural description and bibliographic information. **Video Recordation** – Video recordation shall be undertaken before demolition or site permits are issued. The project sponsor shall undertake video documentation of the affected historical resource and its setting. The documentation shall be conducted by a professional videographer, one with experience recording architectural resources. The documentation shall be narrated by a qualified professional who meets the standards for history, architectural history, or architecture (as appropriate) set forth by the Secretary of the Interior's Professional Qualification Standards (36 Code of Federal Regulations Part 61). The documentation shall include as much information as possible—using visuals in combination with narration—about the materials, construction methods, current condition, historic use, and historic context of the historical resource. This mitigation measure would supplement the traditional HABS/HALS documentation, and would enhance the collection of reference materials that would be available to the public and inform future research. **Softcover Book** – A Print-on-Demand softcover book shall be produced that includes the content from the historical report, historical photographs, HABS/HALS photography, measured drawings, and field notes. The Print-on-Demand book shall be made available to the public for distribution.	

Impact	Level of Significance before Mitigation	Mitigation and Improvement Measures	Level of Significance after Mitigation
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		The project sponsor shall transmit such documentation to the History Room of the San Francisco Public Library, San Francisco Architectural Heritage, the Planning Department, and the Northwest Information Center. The HABS/HALS documentation scope will determine the requested documentation type for each facility, and the project sponsor will conduct outreach to identify other interested groups. All documentation will be reviewed and approved by the Planning Department's Preservation staff before any demolition or site permit is granted for the affected historical resource. **Mitigation Measure M-CR-1b: Interpretation of the Historical Resource** The project sponsor shall facilitate the development of an interpretive program focused on the history of the project site. The interpretive program should be developed and implemented by a qualified professional with demonstrated experience in displaying information and graphics to the public in a visually interesting manner, such as a museum or exhibit curator. This program shall be initially outlined in a proposal for an interpretive plan subject to review and approval by Planning Department Preservation staff. The proposal shall include the proposed format and location of the interpretive content, as well as high-quality graphics and written narratives. The proposal prepared by the qualified consultant describing the general parameters of the interpretive program shall be approved by Planning Department Preservation staff prior to issuance of the architectural addendum to the site permit. The detailed content, media and other characteristics of such interpretive program shall be approved by Planning Department Preservation staff prior to issuance of a Temporary Certificate of Occupancy. The interpretative program shall include but not be limited to the installation of permanent on-site interpretive displays or screens in publicly accessible locations. Historical photographs, including some of the large-format photographs required by Mitigation Measure M-CR-1a, may be used to illustrate the site's history. The primary goal is to educate visitors and future residents about the property's historical	

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Legend: NI = No Impact; LTS = Less than significant or negligible impact, no mitigation required; S = Significant; SM = Significant but mitigable; SU = Significant and unavoidable adverse impact, no feasible mitigation; SUM = Significant and unavoidable impact after mitigation; NA = Not Applicable			
		themes, associations, and lost contributing features within broader historical, social, and physical landscape contexts. These themes would include but not be limited to the subject property's historic significance as a Midcentury Modern corporate campus designed by Edward B. Page with a landscape designed by Eckbo, Royston & Williams. The interpretive program should be developed in coordination with the archeological program, which would likely include interpretation of the subject property's inclusion in the larger site of California Registered Landmark 760, Former Site of Laurel Hill Cemetery.	
CR-2: The proposed project or project variant would not materially alter, in an adverse manner, the physical characteristics of any off-site historical resources that justify their inclusion in the California Register of Historical Resources.	LTS	None required	N/A
C-CR-1: The impacts of the proposed project or project variant, in combination with other past, present, and reasonably foreseeable future projects, would not materially alter, in an adverse manner, the physical characteristics of historical resources that justify their eligibility for inclusion in the California Register of Historical Resources, resulting in a cumulative impact.	LTS	None required	N/A

Impact	Level of Significance before Mitigation	Mitigation and Improvement Measures	Level of Significance after Mitigation
Legend: NI = No Impact; LTS = Less than significant or negligible impact, no mitigation required; S = Significant; SM = Significant but mitigable; SU = Significant and unavoidable adverse impact, no feasible mitigation; SUM = Significant and unavoidable impact after mitigation; NA = Not Applicable			
Section 4.C, Transportation and Circulation			
TR-1: Construction of the proposed project or project variant would not result in substantial interference with pedestrian, bicycle, or vehicle circulation and accessibility to adjoining areas thereby resulting in potentially hazardous conditions.	LTS	**Improvement Measure I-TR-1: Project Construction Updates** To minimize construction impacts on access for nearby residences, institutions, and businesses, the project sponsor should provide nearby residences and adjacent businesses with regularly updated information regarding construction, including construction activities, peak construction vehicle activities (e.g., concrete pours), travel or parking lane closures, and sidewalk closures via a newsletter and/or website.	N/A
TR-2: The proposed project or project variant would cause substantial additional VMT and/or substantially induce automobile travel.	S	**Mitigation Measure M-TR-2: Reduce Retail Parking Supply** The proposed project or project variant shall provide retail parking in an amount not to exceed the existing neighborhood rate of 1.55 spaces per 1,000 gross square feet by 38 percent (or 2.14 spaces per 1,000 gross square feet).	SM
TR-3: The proposed project or project variant would not cause major traffic hazards.	LTS	**Improvement Measure I-TR-3: Driveway Queue Abatement** It will be the responsibility of the owner/operator of the proposed parking garage to ensure that recurring vehicle queues do not occur on the public right-of-way. A vehicle queue is defined as one or more vehicles (destined to the parking facility) blocking any portion of any public street, alley or sidewalk for a consecutive period of three minutes or longer on a daily or weekly basis. If a recurring queue occurs, the owner/operator of the parking facility will employ abatement methods as needed to abate the queue. Appropriate abatement methods will vary depending on the characteristics and causes of the recurring queue, as well as the characteristics of the parking facility, the street(s) to which the facility connects, and the associated land uses. Suggested abatement methods include but are not limited to the following: redesign of facility to improve vehicle circulation and/or on-site queue capacity; ingress/egress	N/A

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		restrictions, such as limiting access to right-in/right-out; employment of parking attendants; installation of "LOT FULL" signs with active management by parking attendants; use of valet parking or other space-efficient parking techniques; use of parking occupancy sensors and signage directing drivers to available spaces; transportation demand management strategies such as customer/employee shuttles, delivery services; and/or parking demand management strategies such as parking time limits, paid parking, time-of-day parking surcharge, or validated parking. If the Planning Director, or his or her designee, suspects that a recurring queue is present, the department will notify the property owner in writing. Upon request, the owner/operator will hire a qualified transportation consultant to evaluate the conditions at the site for no less than seven days. The consultant will prepare a monitoring report to be submitted to the department for review. If the department determines that a recurring queue does exist, the facility owner/operator will have 90 days from the date of the written determination to abate the queue.	
TR-4: The proposed project or project variant would result in an adverse transit capacity utilization impact for Muni route 43 Masonic during the weekday a.m. peak hour under baseline conditions.	S	**Mitigation Measure M-TR-4: Monitor and Provide Fair-Share Contribution to Improve 43 Masonic Capacity** Based on an evaluation of the transit ridership generated by the proposed project or project variant, monitoring of transit capacity utilization for the 43 Masonic route shall be initiated when the first phase of development has been completed and occupied. The transit monitoring phase shall involve the following steps. • The project sponsor shall fund a transit capacity study to be reviewed and approved by the SFMTA. The project sponsor shall obtain current ridership on the 43 Masonic route from SFMTA and an assessment of the capacity utilization shall be conducted at the 43 Masonic route's maximum load point for weekday a.m. peak hour conditions. • If the capacity utilization exceeds 85 percent, a fair share contribution payment shall be made to SFMTA by the project sponsor, calculated in a Transit Mitigation Agreement, to contribute to the cost of providing additional bus service or otherwise improving service on the 43 Masonic route.	SUM

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		The fair share contribution as documented in EIR Appendix D shall not exceed the following amounts across all phases. Payment of the following fair share contribution levels would mitigate the impacts of the estimated transit ridership added by full development of the proposed project or project variant. • Proposed Project – $182,227 • Project Variant – $218,390 SFMTA will determine whether adding bus(es) or other measures are more desirable to increase capacity along the route and will use the funds provided by the project sponsor to implement the most desirable measure, which may include, but is not limited to, the following: 1. Instead of adding more buses to a congested route, increase travel speeds along the route, which would allow for buses to move faster, thus increasing efficiency and reliability. In this case, the project sponsor's fair share contribution may be used to fund a study to identify appropriate and feasible improvements and/or implement a portion of the improvements that would increase travel speeds enough to increase capacity along the bus route. Such improvements could include transit only lanes, transit signal priority, and transit boarding improvements. 2. Increase capacity along the corridor by adding a new Muni service route in this area. If this option is selected, the project sponsor's fair share contribution may fund the purchase of the new vehicles. If the capacity utilization with the proposed project or project variant based on SFMTA's ridership data is less than 85 percent after a particular phase of the proposed project or project variant is completed and occupied, then the project sponsor's fair share payment shall be $0 and the process shall repeat at the subsequent phase. Each subsequent fair share calculation shall take account of amounts paid for prior phases, to ensure that payments are not duplicative for the same transit rider impacts.	

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TR-5: The proposed project or project variant would not result in an adverse impact related to a substantial increase in transit delays.	LTS	None required	N/A
TR-6: The proposed project or project variant would not cause significant impacts on regional transit.	LTS	None required	N/A
TR-7: The proposed project or project variant would not result in substantial overcrowding on public sidewalks, create potentially hazardous conditions for pedestrians, or otherwise interfere with pedestrian accessibility to the site and adjoining areas.	LTS	None required	N/A
TR-8: The proposed project and project variant would not create potentially hazardous conditions for bicyclists and would not interfere with bicycle accessibility to the project site or adjoining areas.	LTS	None required	N/A

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TR-9: The proposed project's or project variant's freight loading demand would be met during the peak loading hour.	LTS	**Improvement Measure I-TR-9a: Schedule and Coordinate Deliveries** Per Planning Code section 169.5, the project will maintain a transportation demand management (TDM) coordinator.[2] The project's TDM coordinator will work with delivery providers and building tenants to schedule and coordinate loading activities to ensure that any freight loading/service vehicles can be accommodated either in the proposed on-street or on-site/off-street loading spaces. Loading and moving activities will be minimized during peak periods and spread across the day, thereby reducing activity during the peak hour for loading. The TDM coordinator will work with tenants to find opportunities to consolidate deliveries and reduce the need for peak period deliveries whenever possible. Deliveries will be scheduled to minimize loading activities during peak periods and reduce potential for conflicts with traffic, transit, bicyclists, and pedestrians on the surrounding street network. Freight loading/service vehicles will be monitored and actively discouraged from parking illegally or obstructing traffic, transit, bicycle, or pedestrian flow along the project frontages. **Improvement Measure I-TR-9b: Monitor Loading Activity and Implement Loading Management Strategies as Needed** After completion of the proposed project or project variant, the project sponsor will conduct a utilization study of commercial and passenger loading spaces. If the result of the study indicates that fewer than 15 percent of the loading spaces (e.g., 1 space) are available during the peak loading period, the project sponsor will implement loading management strategies and/or provide additional or expanded loading supply to meet the loading demand.	N/A

[2] The project sponsor of a development project subject to the requirements of planning code section 169 must designate a TDM coordinator. The TDM coordinator may be an employee for the development project (e.g., property manager) or the project sponsor may contract with a third-party provider(s) (e.g., transportation brokerage services as required for certain projects pursuant to planning code section 163). The TDM coordinator shall be delegated authority to coordinate and implement the TDM Plan.

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		Additional loading strategies could include (but are not limited to): • Expanding efforts to coordinate with parcel delivery companies to schedule deliveries during off-peak hours • Installing delivery supportive amenities such as lock boxes and unassisted delivery systems to allow delivery personnel access and enable off-peak hour deliveries • Coordinating delivery services across buildings to enable the delivery of several buildings' packages to a single location • Requiring deliveries to the retail and restaurant components of the proposed project or project variant to occur during early morning or late evening hours • Reserving on-street parking spaces for smaller delivery vehicles through the SFMTA Temporary Signage Program	
TR-10: The proposed project's or project variant's passenger loading demand would be met during the peak loading hour and would not create hazardous conditions or significant delays for transit, bicycles or pedestrians.	LTS	None required	N/A
TR-11: The proposed project or project variant would not result in significant impacts on emergency access to the project site or adjacent locations.	LTS	None required	N/A
C-TR-1: Construction of the proposed project or project variant, in combination with reasonably foreseeable future	LTS	None required	N/A

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projects, would not result in a cumulatively considerable contribution to cumulative construction-related transportation impacts.			
C-TR-2: The proposed project's or project variant's incremental effects on regional VMT would be significant, when viewed in combination with past, present, and reasonably foreseeable future projects.	S	See **Mitigation Measure M-TR-2: Reduce Retail Parking Supply**, above.	SM
C-TR-3: The proposed project or project variant would not contribute considerably to a major traffic hazard.	LTS	None required	N/A
C-TR-4: The proposed project or project variant would not contribute considerably to significant cumulative transit capacity impacts on Muni screenlines.	LTS	None required	N/A
C-TR-5: The proposed project or project variant would not contribute considerably to significant cumulative transit delay impacts.	LTS	None required	N/A

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C-TR-6: The proposed project or project variant would not contribute considerably to significant cumulative transit capacity impacts on regional transit routes.	LTS	None required	N/A
C-TR-7: The proposed project or project variant would not contribute considerably to significant cumulative pedestrian impacts.	LTS	None required	N/A
C-TR-8: The proposed project or project variant would not contribute considerably to a significant cumulative bicycle impact.	LTS	None required	N/A
C-TR-9: The proposed project or project variant would not contribute considerably to a significant cumulative freight loading impact.	LTS	None required	N/A
C-TR-10: The proposed project or project variant would not contribute considerably to a significant cumulative passenger loading impact.	LTS	None required	N/A
C-TR-11: The proposed project or project variant would not contribute considerably to a	LTS	None required	N/A

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significant cumulative impact on emergency vehicle access.			
Section 4.D, Noise and Vibration			
NO-1: Construction of the proposed project or project variant would expose people to or generate noise levels in excess of applicable standards or cause a substantial temporary or periodic increase in ambient noise levels.	S	**Mitigation Measure M-NO-1: Construction Noise Control Measures** The project sponsor shall implement a project-specific Noise Control Plan that has been prepared by a qualified acoustical consultant and approved by the Planning Department. The Noise Control Plan may include, but is not limited to, the following construction noise control measures. Implementation of applicable construction noise control measures shall apply to all phases of the construction period. • Muffle and maintain all equipment used on site. All internal combustion engine driven equipment shall be fitted with mufflers that are in good working condition. • Position stationary noise sources, such as temporary generators and pumps, as far from nearby receptors as possible, within temporary enclosures and shielded by barriers (which could reduce construction noise by as much as 5 dB) or other measures, to the extent feasible. • Use “quiet” models of air compressors and other stationary equipment where such technology exists. • Prohibit unnecessary idling of internal combustion engines. • Impact tools (e.g., jack hammers, pavement breakers, rock drills) used for project construction shall be “quiet” gasoline-powered compressors or electrically powered compressors, and electric rather than gasoline- or diesel-powered engines shall be used to avoid noise associated with compressed air exhaust from pneumatically powered tools. However, where the use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust shall be used; this muffler can lower noise levels from the exhaust by up to about 10 dBA. External jackets on the tools themselves shall be used, which could achieve a reduction of 5 dBA. Quieter equipment shall be used when feasible, such as drills rather than impact equipment. • Clearly post allowable construction hours (i.e., 7 a.m. to 8 p.m.) on signs around	SUM

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		the project site through the duration of construction.
		• During the excavation component of all construction phases and during building construction (framing of structure and major exterior work) of the Euclid and Masonic buildings, the Laurel Duplexes, and the Mayfair Building, prepare and implement a daytime construction-noise monitoring program (e.g., 7 a.m. to 7 p.m. during weekdays, and 7 a.m. to 3 p.m. on Saturdays). Three monitoring stations shall be required to provide continuous noise monitoring at the nearest potentially impacted receptors to the south (along Euclid Avenue), to the west (along Laurel Street), and to the north (along California Street). Selection of the three monitoring locations shall be coordinated between the Planning Department, construction contractor, and ultimately the affected residential property owners. The program shall be set up to alert the Construction Manager or other designated person(s) when noise levels exceed allowable limits (10 dBA above established ambient levels). If noise levels are found to exceed applicable noise limits due to construction-related activities, corrective action shall be taken, such as halting or moving specific construction activities, fixing faulty or poorly operating equipment, and installing portable barriers.
		• Designate a Construction Manager who shall:
		  ○ Clearly post his/her name and phone number(s) on signs visible during each phase of the construction program.
		  ○ Notify area residents of construction activities, schedules, and impacts.
		  ○ Receive and act on complaints about construction noise disturbances.
		  ○ Determine the cause(s) and implement remedial measures as necessary to alleviate potentially significant problems related to construction noise
		  ○ Request night noise permits from the San Francisco Department of Building Inspection (DBI) if any activity, including deliveries or staging, is anticipated outside of work hours that has the potential to exceed noise standards. If such activity is required in response to an emergency or other unanticipated conditions, night noise permits shall be requested as soon as feasible for any ongoing response activities.	

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		○ Notify the Planning Department's Development Performance Coordinator at the time that night noise permits are requested or as soon as possible after emergency/unanticipated activity causing noise with the potential to exceed noise standards has occurred. Plan Review, Implementation, and Reporting The Noise Control Plan shall be reviewed and approved by the San Francisco Planning Department prior to implementation. Noise monitoring shall be completed by a qualified noise consultant. A noise monitoring log report shall be prepared by the Construction Manager or other designated person(s) on a weekly basis and shall be made available to the Planning Department when requested. The log shall include any complaints received, whether in connection with an exceedance or not, as well as any complaints received through calls to 311 or DBI if the contractor is made aware of them (for example, via a DBI notice, inspection, or investigation). Any weekly report that includes an exceedance or for a period during which a complaint is received should be submitted to the Development Performance Coordinator within 3 business days following the week in which the exceedance or complaint occurred. A report also shall be submitted to the Planning Department Development Performance Coordinator at the completion of each construction phase. The report shall document noise levels, exceedances of threshold levels, if reported, and corrective action(s) taken.	
NO-2: Construction of the proposed project or project variant would expose structures to or generate excessive groundborne vibration levels but not excessive groundborne noise.	S	**Mitigation Measure M-NO-2: Vibration Monitoring Program for SF Fire Credit Union Building** Prior to excavation activities along California Street, including for the Walnut Building and California Street Garage, a detailed vibration assessment and monitoring plan shall be completed to ensure that construction activities and equipment are selected and designed to ensure groundborne vibration levels at the SF Fire Credit Union do not exceed levels protective of the structural integrity of the building. The project contractor shall:	SM

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		• Retain the services of a qualified structural engineer or vibration consultant to prepare a pre-construction building assessment and vibration monitoring plan of the SF Fire Credit Union building. • Prior to excavation activities for the Walnut Building and the California Street Garage, perform inspection of the SF Fire Credit Union building to document existing building conditions with written and photographic descriptions of the existing condition of visible exteriors and in interior locations upon permission of the owner. The assessment shall determine specific locations to be monitored and include annotated drawings to locate digital photo locations, survey markers, and/or other monitoring devices to measure vibrations. Based on the construction program for the proposed project or project variant and the condition of the SF Fire Credit Union building, the structural engineer and/or vibration consultant shall develop a vibration monitoring plan to protect the SF Fire Credit Union building. The pre-construction assessment and vibration monitoring plan shall be submitted to the Planning Department prior to issuance of construction permits for excavation for the Walnut Building and the California Street Garage. • Inform the SF Fire Credit Union of upcoming construction activities that may generate high levels of vibration, including excavator use that may occur within 15 feet of this building (thereby providing a 7-foot protective buffer to the 8-foot distance where damage may occur). • Perform vibration monitoring at the SF Fire Credit Union building during excavation activities for the Walnut Building and the California Street Garage when operating heavy equipment (i.e., excavators) within 15 feet of the building foundation. Vibration monitoring shall be conducted on a daily basis, as needed, when heavy equipment operates within 15 feet of the building foundation. When vibration levels exceed allowable threshold the Construction Manager, structural engineer, or other designated person(s) shall be alerted. • Should the measured vibration levels at the SF Fire Credit Union building during excavation for the Walnut Building and the California Street Garage exceed 0.5 PPV (in/sec) at any time, or if damage to the SF Fire Credit Union building is	

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		observed, construction personnel shall immediately cease excavation and implement vibration control measures such as adjustment of excavation methods to reduce vibration of soil or use of equipment that generates lower levels of vibration. Examples of equipment that may generate lower levels of vibration may include smaller sized back-hoes. • If damage to the SF Fire Credit Union building occurs, the building shall be remediated to its pre-construction condition at the conclusion of ground-disturbing activity, as shown in the pre-construction assessment, with the consent of the building owner. **Plan Review, Implementation, and Reporting** The Detailed Vibration Assessment Plan shall be reviewed and approved by the San Francisco Planning Department prior to implementation. Vibration measurements shall be completed by a qualified structural engineer or vibration consultant. A vibration monitoring log report is to be prepared by the Construction Manager or other designated person(s) on a weekly basis during excavation for the Walnut Building and California Street Garage, and shall be made available to the Planning Department Development Performance Coordinator and building department when requested. A final report on the vibration monitoring shall be submitted to the Planning Department following completion of Walnut Building and California Street Garage excavation and prior to the issuance of a Certificate of Occupancy. The report shall document vibration levels, exceedances of the threshold level, if reported, and corrective action(s) taken.	
NO-3: Operation of the proposed project or project variant would not result in a substantial permanent increase in ambient noise levels in the immediate project vicinity, or permanently expose persons to	S	**Mitigation Measure M-NO-3: Stationary Equipment Noise Controls** Noise attenuation measures shall be incorporated into all stationary equipment (including HVAC equipment) installed on all buildings that include such stationary equipment as necessary to meet noise limits specified in Section 2909 of the Police Code. Interior noise limits shall be met under both existing and future noise conditions. Noise attenuation measures could include provision of sound enclosures/barriers, addition of roof parapets to block noise, increasing setback distances from sensitive receptors, provision of louvered	SM

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noise levels in excess of standards in the San Francisco General Plan and the San Francisco Noise Ordinance.		vent openings, and location of vent openings away from adjacent residential uses.	
NO-4: Operation of the proposed project or project variant would not cause substantial permanent increases in ambient noise levels along roadway segments in the project site vicinity.	LTS	None required	N/A
NO-5: The proposed project's or project variant's occupants would not be substantially affected by future noise levels on the site.	LTS	None required	N/A
NO-6: Operation of the proposed project or project variant would not expose people and structures to or generate excessive groundborne vibration or noise levels.	LTS	None required	N/A
C-NO-1: Construction noise as a result of the proposed project or project variant, combined with construction noise from reasonably foreseeable projects in the project area, would not cause a substantial temporary or	LTS	None required	N/A

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periodic increase in ambient noise levels in the project vicinity during construction.			
C-NO-2: Operation of the proposed project or project variant, in combination with other development, would not cause a substantial permanent increase in ambient noise levels in the project vicinity.	LTS	None required	N/A
Section 4.E, Air Quality			
AQ-1: During construction, the proposed project or project variant would generate fugitive dust and criteria air pollutants which would not violate an air quality standard, contribute substantially to an existing or projected air quality violation, or result in a cumulatively considerable net increase in criteria air pollutants.	LTS	None required	N/A
AQ-2: At project build-out, the operation of the proposed project or project variant would not result in emissions of criteria air pollutants at levels that would violate an air quality standard, contribute to an existing or	LTS	None required	N/A

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projected air quality violation, or result in a cumulatively considerable net increase in criteria air pollutants.			
AQ-3: Construction and operation of the proposed project or project variant would not generate toxic air contaminants, including DPM, at levels which would expose sensitive receptors to substantial pollutant concentrations.	LTS	None required	N/A
AQ-4: The proposed project or project variant would not conflict with implementation of the 2017 Bay Area Clean Air Plan.	LTS	None required	N/A
C-AQ-1: The proposed project or project variant, in combination with past, present, and reasonably foreseeable future development in the project area, would not contribute to cumulative regional air quality impacts.	LTS	None required	N/A

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C-AQ-2: The proposed project or project variant, in combination with past, present, and reasonably foreseeable future development in the project area, would not contribute to cumulative health risk impacts on sensitive receptors.	LTS	None required	N/A

Source: SWCA

Table S.2: Summary of Significant Impacts of Proposed Project or Project Variant Identified in the Initial Study (EIR Appendix B)

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Cultural Resources			
CR-2: Construction activities of the proposed project or project variant could cause a substantial adverse change in the significance of an archaeological resource.	S	**Mitigation Measure M-CR-2a: Archaeological Testing, Monitoring, Data Recovery and Reporting** Based on a reasonable presumption that archaeological resources may be present within the project site, the following measures shall be undertaken to avoid any potentially significant adverse effect from the project on buried historical or prehistoric resources. The project sponsor shall retain the services of an archaeological consultant from rotation of the Department Qualified Archaeological Consultants List maintained by the Planning Department archaeologist. The project sponsor shall contact the Department archaeologist to obtain the names and contact information for the next three archaeological consultants on the qualified archaeological consultants list. The archaeological consultant shall undertake an archaeological testing program as specified in the Archaeological Research Design and Treatment Plan and outlined below. In addition, the consultant shall be available to conduct an archaeological monitoring program, as required pursuant to this measure. The archaeological consultant's work shall be conducted in accordance with this measure at the direction of the Environmental Review Officer (ERO). All plans and reports prepared by the consultant as specified herein shall be submitted first and directly to the ERO for review and comment, and shall be considered draft reports subject to revision until final approval by the ERO. Archaeological monitoring and/or testing programs required by this measure could suspend construction of the project for up to a maximum of four weeks. At the direction of the ERO, the suspension of construction can be extended beyond four weeks only if such a suspension is the only feasible means to reduce to a less than significant level potential effects on a significant archaeological resource as defined in CEQA Guidelines section 15064.5 (a) and (c).	SM

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		Consultation with Descendant Communities On discovery of an archaeological site[3] associated with descendant Native Americans, the Overseas Chinese, or other potentially interested descendant group, an appropriate representative[4] of the descendant group and the ERO shall be contacted. The representative of the descendant group shall be given the opportunity to monitor archaeological field investigations of the site and to consult with the ERO regarding appropriate archaeological treatment of the site, of recovered data from the site, and, if applicable, any interpretative treatment of the associated archaeological site per Mitigation Measure M-CR-2b (below). A copy of the Final Archaeological Resources Report shall be provided to the representative of the descendant group. Archaeological Testing Program The archaeological consultant shall prepare and submit to the ERO for review and approval an archaeological testing plan (ATP) that tiers off the Archaeological Research Design and Treatment Plan. The purpose of the archaeological testing program will be to determine to the extent possible the presence or absence of archaeological resources and to identify and to evaluate whether any archaeological resource encountered on the site constitutes an historical resource under CEQA. At the completion of the archaeological testing program, the archaeological consultant shall submit a written report of the findings to the ERO. If based on the archaeological testing program the archaeological consultant finds that significant archaeological resources may be present, the ERO in consultation with the archaeological consultant shall determine if additional measures are warranted. Additional measures that may be undertaken include additional archaeological	

3 The term “archaeological site” is intended here to minimally include any archaeological deposit, feature, burial, or evidence of burial.

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

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		testing, archaeological monitoring, and/or an archaeological data recovery program. If the ERO determines that a significant archaeological resource is present and that the resource could be adversely affected by the project, at the discretion of the project sponsor either: A) The project shall be redesigned so as to avoid any adverse effect on the significant archaeological resource; or B) A data recovery program shall be implemented, unless the ERO determines that the archaeological resource is of greater interpretive than research significance and that interpretive use of the resource is feasible. <u>Archaeological Monitoring Program</u> If the ERO in consultation with the archaeological consultant determines that an archaeological monitoring program (AMP) shall be implemented, the AMP would minimally include the following provisions: • The archaeological consultant, project sponsor, and ERO shall meet and consult on the scope of the AMP prior to any project-related soils disturbing activities commencing. The ERO in consultation with the archaeological consultant shall determine what project activities shall be archaeologically monitored. A single AMP or multiple AMPs may be produced to address project phasing. In most cases, any soils-disturbing activities, such as demolition, foundation removal, excavation, grading, utilities installation, foundation work, driving of piles (foundation, shoring, etc.), site remediation, etc., shall require archaeological monitoring because of the risk these activities pose to potential archaeological resources and to their depositional context. The archaeological consultant shall advise all project contractors to be on the alert for evidence of the presence of the expected resource(s), of how to identify the evidence of the expected resource(s), and of the appropriate protocol in the event of apparent discovery of an	

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		archaeological resource; • The archaeological monitor(s) shall be present on the project site according to a schedule agreed upon by the archaeological consultant and the ERO until the ERO has, in consultation with project archaeological consultant, determined that project construction activities could have no effects on significant archaeological deposits; and • The archaeological monitor shall record and be authorized to collect soil samples and artifactual/ecofactual material as warranted for analysis. If an intact archaeological deposit is encountered, all soils-disturbing activities in the vicinity of the deposit shall cease. The archaeological monitor shall be empowered to temporarily redirect demolition/excavation/pile driving/construction activities and equipment until the deposit is evaluated. If in the case of pile driving activity (foundation, shoring, etc.), the archaeological monitor has cause to believe that the pile driving activity may affect an archaeological resource, pile driving activity that may affect the archaeological resource shall be suspended until an appropriate evaluation of the resource has been made in consultation with the ERO. The archaeological consultant shall immediately notify the ERO of the encountered archaeological deposit. The archaeological consultant shall make a reasonable effort to assess the identity, integrity, and significance of the encountered archaeological deposit, and present the findings of this assessment to the ERO. If the ERO determines that a significant archaeological resource is present and that the resource could be adversely affected by the project, at the discretion of the project sponsor either: A) The project shall be redesigned so as to avoid any adverse effect on the significant archaeological resource; or B) A data recovery program shall be implemented, unless the ERO determines that the archaeological resource is of greater interpretive than research significance and that interpretive use of the resource is feasible.	

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		Whether or not significant archaeological resources are encountered, the archaeological consultant shall submit a written report of the findings of the monitoring program to the ERO. <u>Archaeological Data Recovery Program</u> If the ERO, in consultation with the archaeological consultant, determines that an archaeological data recovery program shall be implemented based on the presence of a significant resource, the archaeological data recovery program shall be conducted in accord with an archaeological data recovery plan (ADRP). No archaeological data recovery shall be undertaken without the prior approval of the ERO or the Planning Department archaeologist. The archaeological consultant, project sponsor, and ERO shall meet and consult on the scope of the ADRP prior to preparation of a draft ADRP. The archaeological consultant shall submit a draft ADRP to the ERO. The ADRP shall identify how the proposed data recovery program will preserve the significant information the archaeological resource is expected to contain. That is, the ADRP will identify what scientific/historical research questions are applicable to the expected resource, what data classes the resource is expected to possess, and how the expected data classes would address the applicable research questions. Data recovery, in general, shall be limited to the portions of the historical property that could be adversely affected by the proposed project. Destructive data recovery methods shall not be applied to portions of the archaeological resources if nondestructive methods are practical. The scope of the ADRP shall include the following elements: • *Field Methods and Procedures.* Descriptions of proposed field strategies, procedures, and operations. • *Cataloguing and Laboratory Analysis.* Description of selected cataloguing system and artifact analysis procedures.	

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		• *Discard and Deaccession Policy*. Description of and rationale for field and post-field discard and deaccession policies. • *Interpretive Program*. Consideration of an onsite/offsite public interpretive program during the course of the archaeological data recovery program. • *Security Measures*. Recommended security measures to protect the archaeological resource from vandalism, looting, and non-intentionally damaging activities. • *Final Report*. Description of proposed report format and distribution of results. • *Curation*. Description of the procedures and recommendations for the curation of any recovered data having potential research value, identification of appropriate curation facilities, and a summary of the accession policies of the curation facilities. Human Remains and Associated or Unassociated Funerary Objects The treatment of human remains and of associated or unassociated funerary objects discovered during any soils disturbing activity shall comply with applicable State and Federal laws. This shall include immediate notification of the ERO and the Medical Examiner of the City and County of San Francisco and in the event of the Medical Examiner's determination that the human remains are Native American remains, notification of the California State Native American Heritage Commission (NAHC) who shall appoint a Most Likely Descendant (MLD) (Public Resources Code section 5097.98). The archaeological consultant, project sponsor, ERO, and MLD shall make all reasonable efforts to develop an agreement for the treatment of, with appropriate dignity, human remains and associated or unassociated funerary objects (CEQA Guidelines section 15064.5(d)). The agreement shall take into consideration the appropriate excavation, removal, recordation, analysis, custodianship, curation, and final disposition of the human remains and associated or unassociated funerary objects. Nothing in existing State regulations or in this mitigation measure compels the project sponsor and the ERO to accept recommendations of an MLD. The	

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		archaeological consultant shall retain possession of any Native American human remains and associated or unassociated burial objects until completion of any scientific analyses of the human remains or objects as specified in the treatment agreement if such agreement has been made or, otherwise, as determined by the archaeological consultant and the ERO. Treatment of historic-period human remains and of associated or unassociated funerary objects discovered during any soil-disturbing activity will additionally follow protocols laid out in the Archaeological Research Design and Treatment Plan, the ATP, and any agreement established between the project sponsor, Medical Examiner and the ERO. <u>Final Archaeological Resources Report</u> The archaeological consultant shall submit a Final Archaeological Resources Report (FARR) to the ERO that evaluates the historical significance of any discovered archaeological resource and describes the archaeological and historical research methods employed in the archaeological testing/monitoring/data recovery program(s) undertaken. Information that may put at risk any archaeological resource shall be provided in a separate removable insert within the FARR. The FARR may be submitted at the conclusion of all construction activities associated with the project. Once approved by the ERO, copies of the FARR shall be distributed as follows: California Archaeological Site Survey Northwest Information Center (NWIC) shall receive one (1) copy and the ERO shall receive a copy of the transmittal of the FARR to the NWIC. The Environmental Planning division of the Planning Department shall receive one bound, one unbound and one unlocked, searchable PDF copy on CD of the FARR along with copies of any formal site recordation forms (CA Department of Parks and Recreation [DPR] 523 series) and/or documentation for nomination to the National Register of Historic Places (National register)/California Register of Historical Resources (California register). In instances of high public interest in or the high interpretive value of the resource, the ERO may require a different final	

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		report content, format, and distribution than that presented above. **Mitigation Measure M-CR-2b: Interpretation** Based on a reasonable presumption that archaeological resources may be present within the project site, and to the extent that the potential significance of some such resources is premised on the California register Criteria 1 (Events), 2 (Persons), and/or 3 (Design/Construction), the following measure shall be undertaken to avoid any potentially significant adverse effect from the project on buried historical resources if significant archaeological resources are discovered. The project sponsor shall implement an approved program for interpretation of significant archaeological resources. The project sponsor shall retain the services of a qualified archaeological consultant from the rotational qualified archaeological consultant list maintained by the Planning Department archaeologist having expertise in California urban historical and prehistoric archaeology. The archaeological consultant shall develop a feasible, resource-specific program for post-recovery interpretation of resources. The particular program for interpretation of artifacts that are encountered within the project site will depend upon the results of the data recovery program and will be the subject of continued discussion between the ERO, consulting archaeologist, and the project sponsor. Such a program may include, but is not limited to, any of the following (as outlined in the Archaeological Research Design and Treatment Plan): lectures, exhibits, websites, video documentaries, and preservation and display of archaeological materials. To the extent feasible, the interpretive program shall be part of a larger, coordinated public interpretation strategy for the project area. The archaeological consultant's work shall be conducted at the direction of the ERO, and in consultation with the project sponsor. All plans and recommendations for interpretation by the consultant shall be submitted first and directly to the ERO for review and comment, and shall be considered draft reports subject to revision until final approval by the ERO.	

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CR-3: Construction activities of the proposed project or project variant could disturb human remains, if such remains are present within the project site.	S	See **Mitigation Measures M-CR-2a and M-CR-2b**, above.	SM
CR-4: Construction activities of the proposed project or project variant could disturb tribal cultural resources, if such resources are present within the project site.	S	**Mitigation Measure M-CR-4: Tribal Cultural Resources Interpretive Program** If the Environmental Review Officer (ERO) determines that a significant archaeological resource is present, and if in consultation with the affiliated Native American tribal representatives, the ERO determines that the resource constitutes a tribal cultural resource (TCR) and that the resource could be adversely affected by the proposed project, the proposed project shall be redesigned so as to avoid any adverse effect on the significant tribal cultural resource, if feasible. If the ERO, in consultation with the affiliated Native American tribal representatives and the project sponsor, determines that preservation-in-place of the tribal cultural resources is not a sufficient or feasible option, the project sponsor shall implement an interpretive program of the TCR in consultation with affiliated tribal representatives. An interpretive plan produced in consultation with the ERO and affiliated tribal representatives, at a minimum, and approved by the ERO would be required to guide the interpretive program. The plan shall identify, as appropriate, proposed locations for installations or displays, the proposed content and materials of those displays or installation, the producers or artists of the displays or installation, and a long- term maintenance program. The interpretive program may include artist installations, preferably by local Native American artists, oral histories with local Native Americans, artifacts displays and interpretation, and educational panels or other informational displays.	SM

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C-CR-1: The proposed project or project variant, in combination with past, present, and reasonably foreseeable future projects in the vicinity, would result in a cumulatively considerable contribution to significant cumulative impacts on as-yet unknown archaeological resources, human remains, or tribal cultural resources.	S	See **Mitigation Measures M-CR-2a, M-CR-2b: and M-CR-4**, above.	SM
Biological Resources			
BI-1: The proposed project or project variant would have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service; and the proposed project or project variant would interfere substantially with the movement of native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.	S	**Mitigation Measure M-BI-1: Preconstruction Nesting Bird Surveys and Buffer Areas** Nesting birds and their nests shall be protected during construction by implementation of the following measures for each construction phase: a. To the extent feasible, conduct initial activities including, but not limited to, vegetation removal, tree trimming or removal, ground disturbance, building demolition, site grading, and other construction activities which may compromise breeding birds or the success of their nests outside of the nesting season (January 15 through August 15). b. If construction during the bird nesting season cannot be fully avoided, a qualified wildlife biologist* shall conduct pre-construction nesting surveys within 14 days prior to the start of construction or demolition at areas that have not been previously disturbed by project activities or after any construction breaks of 14 days or more. Surveys shall be performed for suitable habitat within 250 feet of the project site in order to locate any active nests of common bird species and within 500 feet of the project site to locate any active raptor (birds of prey) nests. c. If active nests are located during the preconstruction nesting bird surveys, a	SM

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		qualified biologist shall evaluate if the schedule of construction activities could affect the active nests and if so, the following measures would apply: i. If construction is not likely to affect the active nest, construction may proceed without restriction; however, a qualified biologist shall regularly monitor the nest at a frequency determined appropriate for the surrounding construction activity to confirm there is no adverse effect. Spot-check monitoring frequency would be determined on a nest-by-nest basis considering the particular construction activity, duration, proximity to the nest, and physical barriers which may screen activity from the nest. The qualified biologist may revise his/her determination at any time during the nesting season in coordination with the Planning Department. ii. If it is determined that construction may affect the active nest, the qualified biologist shall establish a no-disturbance buffer around the nest(s) and all project work shall halt within the buffer until a qualified biologist determines the nest is no longer in use. Typically, these buffer distances are 250 feet for passerines and 500 feet for raptors; however, the buffers may be adjusted if an obstruction, such as a building, is within line-of-sight between the nest and construction. iii. Modifying nest buffer distances, allowing certain construction activities within the buffer, and/or modifying construction methods in proximity to active nests shall be done at the discretion of the qualified biologist and in coordination with the Planning Department, who would notify CDFW. Necessary actions to remove or relocate an active nest(s) shall be coordinated with the Planning Department and approved by CDFW. iv. Any work that must occur within established no-disturbance buffers around active nests shall be monitored by a qualified biologist. If adverse effects in response to project work within the buffer are observed and could compromise the nest, work within the no-	

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		disturbance buffer(s) shall halt until the nest occupants have fledged. v. Any birds that begin nesting within the project area and survey buffers amid construction activities are assumed to be habituated to construction-related or similar noise and disturbance levels, so exclusion zones around nests may be reduced or eliminated in these cases as determined by the qualified biologist in coordination with the Planning Department, who would notify CDFW. Work may proceed around these active nests as long as the nests and their occupants are not directly impacted. d. In the event inactive nests are observed within or adjacent to the project site at any time throughout the year, any removal or relocation of the inactive nests shall be at the discretion of the qualified biologist in coordination with the Planning Department, who would notify and seek approval from the CDFW, as appropriate. Work may proceed around these inactive nests.	
C-BI-1: The proposed project or project variant, in combination with past, present, and reasonably foreseeable future projects, would result in a cumulatively considerable contribution to cumulative impacts related to biological resources.	S	**See Mitigation Measure M-BI-1**, above.	SM
Geology and Soils			
GE-5: The proposed project or project variant would directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.	S	**Mitigation Measure M-GE-5: Inadvertent Discovery of Paleontological Resources.** Before the start of any drilling or excavation activities, the project sponsor shall retain a qualified paleontologist, as defined by the Society of Vertebrate Paleontology, who is experienced in on-site construction worker training. The qualified paleontologist shall complete an institutional record and literature search and train all construction personnel who are involved with earthmoving activities,	LTSM

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		including the site superintendent, regarding the possibility of encountering fossils, the appearance and types of fossils that are likely to be seen during construction, and proper notification procedures should fossils be encountered. If potential vertebrate fossils are discovered by construction crews, all earthwork or other types of ground disturbance within 50 feet of the find shall stop immediately and the monitor shall notify the Environmental Review Officer. The fossil should be protected by an "exclusion zone" (an area approximately five feet around the discovery that is marked with caution tape to prevent damage to the fossil). Work shall not resume until a qualified professional paleontologist can assess the nature and importance of the find. Based on the scientific value or uniqueness of the find, the qualified paleontologist may record the find and allow work to continue, or recommend salvage and recovery of the fossil. The qualified paleontologist may also propose modifications to the stop-work radius based on the nature of the find, site geology, and the activities occurring on the site. If treatment and salvage is required, recommendations shall be consistent with Society of Vertebrate Paleontology's 2010 Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources, and currently accepted scientific practice, and shall be subject to review and approval by the Environmental Review Officer. If required, treatment for fossil remains may include preparation and recovery of fossil materials so that they can be housed in an appropriate museum or university collection [e.g., the University of California Museum of Paleontology], and may also include preparation of a report for publication describing the finds. The Planning Department shall ensure that information on the nature, location, and depth of all finds is readily available to the scientific community through university curation or other appropriate means.	

S.3. SUMMARY OF PROJECT ALTERNATIVES

Six alternatives are evaluated in this EIR: the No Project Alternative (Alternative A), as required by CEQA; four preservation alternatives that represent graduating intensities of change to the existing building and the project site (the Full Preservation – Office Alternative [Alternative B]); the Full Preservation – Residential Alternative [Alternative C]); the Partial Preservation – Office Alternative [Alternative D]); and the Partial Preservation – Residential Alternative [Alternative E]); and a Code-Conforming Alternative (Alternative F). These alternatives are summarized below and described in detail in Chapter 6, Alternatives.

Table S.3: Comparison of Characteristics of the Proposed Project, Project Variant, and EIR Alternatives, pp. S.49-S.51, presents a comparison of the characteristics of the proposed project and project variant to the alternatives. Table S.4: Comparison of Significant Impacts of the Proposed Project, Project Variant, and EIR Alternatives, pp. S.53-S.54, presents a comparison of the potential significant environmental impacts of the proposed project and project variant to those that may result from the alternatives.

ALTERNATIVE A: NO PROJECT ALTERNATIVE

CEQA Guidelines section 15126.6(e) requires that, among the project alternatives, a "no project" alternative be evaluated. CEQA Guidelines section 15126.6(e)(2) requires that the no project alternative analysis "discuss the existing conditions…as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and policies and consistent with the available infrastructure and community services."

The No Project Alternative assumes that:

- UCSF would relocate current uses to other campus locations in the city
- the existing site would continue to function as an office use, which would not constitute a change from existing conditions, but would be slightly more intensive
- the existing land use controls on the project site would continue to govern site development and would not be changed

Under Alternative A, the existing physical features on the project site would not change. The existing building at the center of the project site, its parking structure, and the single story, annex building at the northwest corner of the project site (near California and Laurel streets) would be retained in their current conditions. No major modifications, repairs, or restoration activities would be conducted; however, due to its existing condition, in-kind replacement of the glass curtain wall would be needed. The interior of the existing office building could be altered as part of tenant leasing agreements. Any such alterations would not result in a change to the amount of currently leasable office space. There would be no changes to the surrounding landscape, surface parking lots, or garage ramp structures beyond general maintenance and upkeep.

The parking program would not be altered and the existing 543 parking spaces (212 in the partially below-grade parking garage and 331 surface parking spaces on the north and west portions of the project site) and connecting internal roadways would remain. No new buildings or utility infrastructure would be constructed.

If Alternative A were implemented, none of the impacts associated with the proposed project or project variant, as described in Chapter 4 of the EIR and Section E of the initial study (see EIR Appendix B), would occur. Without the proposed project or project variant, incremental changes would be expected to occur in the vicinity of the project site as nearby reasonably foreseeable cumulative projects (see pp. 4.A.5-4.A.8) are approved, constructed, and occupied.

ALTERNATIVE B: FULL PRESERVATION – OFFICE ALTERNATIVE

Alternative B: Full Preservation – Office Alternative would limit development to the northern portion of the site. Existing conditions on the western, southern, and eastern portions of the project site would be maintained.

The existing four-story office building would be retained in its entirety and the office use would continue. A one-level vertical addition would be constructed on the roof to expand the usable space for office uses. The glass curtain wall would be replaced in-kind with a compatible design to accommodate the continued office use. The parking garage would be retained.

Two new multi-family residential buildings (the Plaza B and Walnut buildings) and the California Street Garage would be constructed in the areas currently occupied by the surface parking lots. Uses would include office (continued and expanded), some residential (in new construction), and parking; there would no retail or daycare uses. Alternative B would have a total of 831,856 gross square feet of new and rehabilitated space (187,668 gross square feet of residential floor area [167 residential units], 406,459 gross square feet of office space, and 237,729 gross square feet of parking). (See Table S.3, pp. S.49-S.51.) The land use program for Alternative B would be reduced compared to that for the proposed project and project variant. Alternative B would be constructed in approximately two years (5 to 13 years less than the proposed project or project variant) and in a single phase.

The majority of the site would be retained in its existing condition. The annex building, the perimeter brick wall that borders the north and west (partial) boundaries of the project site, and a portion of the surface parking lot on the western portion of the site, south of Mayfair Drive, would be retained.

Unlike the proposed project or variant, Alternative B would result in a less-than-significant impact on historic architectural resources, a less-than-significant vibration impact on the SF Fire

Credit Union building during construction, and a less-than-significant VMT impact without mitigation. Like the proposed project or project variant, Alternative B would generate significant and unavoidable impacts related to transportation and circulation (transit capacity) and construction noise, although the noise impacts would occur for a shorter duration due to the reduced development program. Operational noise (stationary sources) impacts would be less than significant with mitigation, the same as under the proposed project or project variant. As with the proposed project or project variant, air quality impacts would be less than significant. Significant impacts identified in the initial study for the proposed project or project variant, e.g., archeological resources (including human remains and tribal cultural resources), biological resources, and paleontological resources, would occur and would be reduced to less-than-significant levels with the applicable mitigation measures identified for the proposed project or project variant. No new significant impacts would occur.

ALTERNATIVE C: FULL PRESERVATION – RESIDENTIAL ALTERNATIVE

Alternative C: Full Preservation – Residential Alternative would limit new construction to the northern and western portions of the site adjacent to California Street and Laurel Street/Mayfair Drive. Because the Laurel Duplexes are not included in this alternative, development on the western portion of the site would not be as extensive as it would under the proposed project or project variant. Existing conditions on the southern and eastern portions of the project site would be maintained.

The existing office building would be mostly retained and converted to residential use. The glass curtain wall would be replaced with a compatible design to accommodate the residential use. A one-level vertical addition would be constructed on the roof to provide more space for the residential uses. A portion of the building's parking garage would be retained.

The annex building, perimeter brick wall, and surface parking lots on the north and northwest portions of the site would also be demolished to make way for new construction. Four new mixed-use multi-family residential buildings with ground-floor retail (the Plaza A, Plaza B, Walnut, and Mayfair buildings) and two garages (the California Street and Mayfair garages) would be constructed (as under the project variant), and Mayfair Walk would be developed. Up to 746 vehicle parking spaces would be provided in the California Street and Mayfair garages, the retained parking garage under the existing office building, and the retained surface parking lot south of the proposed Mayfair Building. On the western portion along Laurel Street and south of Mayfair Drive, the concrete pergola, terraced formal landscaping, and surface parking would be mostly retained. Alternative C would be constructed in approximately 5.5 years and in two phases.

Alternative C would have a total of 1,141,734 gross square feet of new and rehabilitated space (705,179 gross square feet of residential floor area [534 residential units], 44,306 gross square feet of ground-floor retail space, 377,599 gross square feet of parking, and 14,650 gross square feet of daycare center space). There would be no office use. (See Table S.3, pp. S.49-S.51.) The development program would be reduced compared to that for the proposed project and project variant.

Alternative C, unlike the proposed project or project variant, would result in a less-than-significant impact on historic architectural resources because it would retain the historical resource at 3333 California Street. The VMT impact would be reduced to a less-than-significant level with mitigation, the same as for the proposed project or project variant. Alternative C would generate significant and unavoidable impacts related to transportation and circulation (transit capacity) and construction noise as would the proposed project or project variant, although these impacts would be reduced somewhat by the less intensive development of the site. Construction vibration (damage to off-site structures) and operational noise (stationary sources) impacts would be less than significant with mitigation, the same as under the proposed project or project variant. As with the proposed project or project variant, air quality impacts would be less than significant. Significant impacts identified in the initial study for the proposed project or project variant, e.g., archeological resources (including human remains and tribal cultural resources), biological resources, and paleontological resources, would occur and would be reduced to less-than-significant levels with the applicable mitigation measures identified for the proposed project or project variant. No new significant impacts would occur.

ALTERNATIVE D: PARTIAL PRESERVATION – OFFICE ALTERNATIVE

Alternative D: Partial Preservation – Office Alternative would limit construction to the northern and western portions of the site. Existing conditions on the southern and eastern portions of the project site would be maintained. The existing office building would be retained and altered with a one-story rooftop addition. The building would continue and expand the existing office use. The glass curtain wall would be replaced in-kind with a compatible design to accommodate the continued office use. The parking garage under the existing building would be partly retained.

The annex building, circular garage ramp structures, surface parking lots, and open landscape areas on the northern and western portions of the site along California and Laurel streets would be replaced by ten new buildings (Plaza A, Plaza B, and Walnut buildings; Mayfair Building; and six Laurel Duplexes) and two garages (the California Street and Mayfair garages). The new California Street and Mayfair garages, the retained parking garage under the existing office building, and the five individual parking garages for the Laurel Duplexes would provide up to 1,132 vehicle parking spaces. Alternative D would be constructed in approximately 5.5 years and in three phases.

Alternative D would have a total of 1,348,702 gross square feet of new and rehabilitated space (475,247 gross square feet of residential floor area [456 residential units], 402,404 gross square feet of office floor area, 44,306 gross square feet of ground-floor retail spaces, 412,095 gross square feet of parking, and 14,650 gross square feet of daycare center space). (See Table S.3, pp. S.49-S.51.) The overall land use program would be slightly reduced compared to that for the proposed project and project variant, with less residential development, more office space, and similar amounts of retail and daycare space.

Alternative D would reduce the significant impact on the historic architectural resource, but not to a less-than-significant level as with the full preservation alternatives. Although the existing historic structure and some of the associated site and landscape features would be retained with more limited building and site demolition compared to the proposed project or project variant, changes to the building in combination with changes to the associated site and landscape features that convey the project site's corporate campus setting would be substantial enough to generate a similarly significant impact as the proposed project or project variant. Thus, as with the proposed project or project variant, Alternative D would result in a significant and unavoidable impact with mitigation on the historic architectural resource.

Unlike the proposed project and project variant, the VMT impact under Alternative D would be less than significant because parking for the retail and other non-residential uses would not be provided at rates substantially different from the neighborhood parking rate for those uses. Like the proposed project or project variant, Alternative D would generate significant and unavoidable impacts related to transportation and circulation (transit capacity) and construction noise. Construction vibration (damage to off-site structures) and operational noise (stationary sources) impacts would be less than significant with mitigation, as under the proposed project or project variant. Air quality impacts would be less than significant as with the proposed project or project variant. Significant impacts identified in the initial study for the proposed project or project variant, e.g., archeological resources (including human remains and tribal cultural resources), biological resources, and paleontological resources, would occur and would be reduced to less-than-significant levels with the applicable mitigation measures identified for the proposed project or project variant. No new significant impacts would occur.

ALTERNATIVE E: PARTIAL PRESERVATION – RESIDENTIAL ALTERNATIVE

Under Alternative E: Partial Preservation – Residential Alternative, development would occur on the northern, western, and southern portions of the project site. Existing conditions on the eastern portion of the project site along Masonic Avenue would be retained with minimal changes beyond the reconstruction of the southeast courtyard.

The existing office building would be partially retained and adapted for residential use, with a two-story addition on the roof. The glass curtain wall would be replaced with a compatible design to accommodate the residential use. The existing building’s south wing (and associated site and landscape features) would be removed. The parking garage under the existing building would be partially retained.

Twelve new buildings (the Plaza A, Plaza B, Walnut, Mayfair, and Euclid buildings, and seven Laurel Duplexes) and three below-grade garages (the California Street, Mayfair, and Euclid garages) would be constructed along California Street, Laurel Street, and Euclid Avenue. Alternative E would be constructed in approximately 6.5 years and in four phases.

Alternative E would have a total of 1,267,740 gross square feet of new and rehabilitated space (811,867 gross square feet of residential floor area [588 residential units], 44,306 gross square feet of ground floor retail spaces, 396,917 gross square feet of parking, and 14,650 gross square feet of daycare center space). As with the project variant, there would be no office uses. The new California Street, Mayfair, and Euclid garages, the retained parking garage, and individual parking garages for the Laurel Duplexes would provide up to 800 vehicle parking spaces. (See Table S.3, pp. S.49-S.51.) The overall land use program would be slightly reduced compared to the proposed project and project variant, with slightly less residential floor area (but more residential units) and similar amounts of retail and daycare space.

Alternative E would reduce the significant impact on the historic architectural resource, but not to a less-than-significant level as with the full preservation alternatives. Although the existing historic structure and some of the associated site and landscape features would be retained with more limited building and site demolition compared to the proposed project or project variant, changes to the building in combination with changes to associated site and landscape features that convey the project site’s corporate campus setting would be substantial enough to generate a significant impact similar to the proposed project or project variant. Thus, as with the proposed project or project variant, Alternative E would result in a significant and unavoidable impact with mitigation on the historic architectural resource.

The VMT impact would be reduced to a less-than-significant level with mitigation, as under the proposed project or project variant. Alternative E would generate significant impacts on transit capacity and construction noise. Impacts from construction vibration related to damage to off-site structures, and operational noise from new stationary sources would be less than significant with mitigation, as under the proposed project or project variant, and air quality impacts would be less than significant. Significant impacts identified in the initial study for the proposed project or project variant, e.g., archeological resources (including human remains and tribal cultural resources), biological resources, and paleontological resources, would occur and would be reduced to less-than-significant levels with the applicable mitigation measures identified for the proposed project or project variant. No new significant impacts would occur.

ALTERNATIVE F: CODE-CONFORMING ALTERNATIVE

Alternative F: Code-Conforming Alternative focuses on the maximum residential development potential of the site as allowed by the planning code within the RM-1 and 40-X zoning and height and bulk districts, respectively, and with respect to the conditions of Resolution 4109.[5] Under this alternative, only residential uses and limited retail uses would be included. There would be no daycare center or office uses. Rezoning of the site would not be required, as it would for the proposed project or project variant; however, a planned unit development would be requested which would allow the residential dwelling unit density and limited retail to support the development pursuant to planning code section 304(d)(5).

As with the proposed project or project variant, the existing office building's south wing and the auditorium under its east wing (along the building's south edge near Masonic Avenue) would be demolished. The existing office building would be adaptively reused for residential use (but not separated into two buildings as under the proposed project or project variant). The glass curtain wall would be replaced in-kind with a compatible design to accommodate the residential use. The parking garage under the existing office building would be partly retained.

Project site changes would be more extensive under this alternative than with the proposed project or project variant. Twenty-six new buildings (the Plaza A, Plaza B, Walnut, Masonic, and Euclid buildings and 21 Laurel and Euclid Duplexes) would be constructed on the full site, and the California Street and Masonic garages would be developed. As with the proposed project or project variant, the existing conditions on the south side of California Street and on the northern portion of the site would be altered with development of three new mixed-use multi-family residential buildings, with limited ground floor retail only in the Plaza A building. However, the proposed California Street buildings would all be 40 feet tall, as opposed to 45 feet (Plaza A and Plaza B buildings) and 67 feet (Walnut Building). The Laurel Duplexes would be developed on the southern and western portions of the project site along Euclid Avenue east of Laurel Street, and along Laurel Street south of Mayfair Drive (10 along Euclid Avenue and 11 along Laurel Street [no Mayfair Building]). Euclid Green would be replaced with the townhomes along Euclid Avenue. The new California Street and Masonic garages, the retained parking garage, and 21 individual two-car parking garages for the duplexes along Euclid Avenue and Laurel Street would provide up to 740 vehicle parking spaces. Alternative F would be constructed in four phases, over a construction timeframe similar to that for the proposed project and project variant.

Overall, Alternative F would have a total of 1,180,004 gross square feet of new and rehabilitated space (849,521 gross square feet of residential floor area [629 residential units], 14,995 gross

[5] Resolution 4109 includes restrictions on the size of buildings, the locations and types of buildings on the site, and specific considerations for development along Euclid Avenue and Laurel Street (see Chapter 2, Project Description, pp. 2.23-2.25 for a more detailed discussion).

square feet of ground-floor retail spaces, and 315,488 gross square feet of parking). (See Table S.**3**, pp. S.49-S.51.)

Alternative F would not reduce the significant impact on the historic architectural resource. Although the existing historic structure at 3333 California Street would be retained and demolition would be somewhat more limited without division of the building as compared to the proposed project or project variant, development of the site would be more intensive under Alternative F and would constitute a material change to the historic resource. Thus, as with the proposed project or project variant, the changes to the building in combination with changes to associated site and landscape features that convey the project site's corporate campus setting would be substantial enough to generate a similarly significant impact. Thus, as with the proposed project or project variant, Alternative F would result in a significant and unavoidable impact with mitigation on the historic architectural resource.

Alternative F would generate significant impacts related to transportation and circulation (vehicle miles traveled and transit), construction noise, construction vibration (damage to off-site structures), and operation noise (stationary sources), as would the proposed project or project variant. As with the proposed project or project variant, air quality impacts would be less than significant. Significant impacts identified in the initial study for the proposed project or project variant, e.g., archeological resources (including human remains and tribal cultural resources), biological resources, and paleontological resources, would occur and would be reduced to less-than-significant levels with the applicable mitigation measures identified for the proposed project or project variant. No new significant impacts would occur.

ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Pursuant to CEQA Guidelines section 15126.6(e)(2), if the no project alternative is the environmentally superior alternative, then an EIR is required to identify another environmentally superior alternative from among the alternatives evaluated. The proposed project or project variant would have significant impacts that cannot be mitigated to a less-than-significant level related to historical resources, transportation (transit), and noise (construction). The environmentally superior alternative is the alternative that best avoids or lessens any significant effects of the proposed project or project variant, even if the alternative would impede to some degree the attainment of the project objectives. Alternative A: No Project Alternative is considered the overall environmentally superior alternative, because it would not result in the significant impacts associated with implementation of the proposed project or project variant. Alternative A, however, would not meet any of the basic project objectives.

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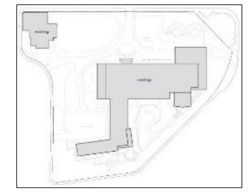
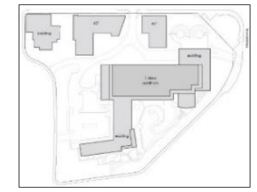
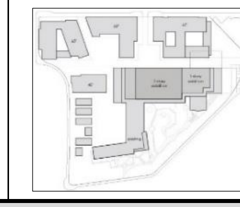
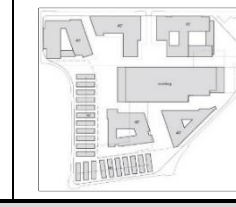
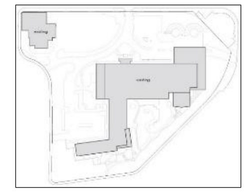
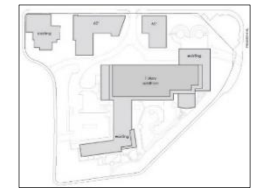
Table S.3: Comparison of Characteristics of the Proposed Project, Project Variant, and EIR Alternatives

	Proposed Project	**Project Variant**	**Alternative A: No Project Alternative**	**Alternative B: Full Preservation – Office Alternative**	**Alternative C: Full Preservation – Residential Alternative**	**Alternative D: Partial Preservation – Office Alternative**	**Alternative E: Partial Preservation – Residential Alternative**	**Alternative F: Code Conforming Alternative**
								
Characteristics of the Proposed Project, Project Variant, and Alternatives								
Building Height (feet)	37 – 92	37 – 92	55.5	18 – 67	40 – 67	37 – 80	37 – 80	40 – 55.5
Number of Stories	3 – 7 stories	3 – 7 stories	1 – 4 stories	1 – 6 stories	4 – 6 stories	4 – 6 stories	4 – 6 stories	4 stories
Number of New or Renovated Buildings	15	15	-	4	5	11	13	27
Site Disturbance	Full Site	Full Site	None	Northern Portion of Site	Northern and Western Portions of Site	Northern and Western Portions of Site	Northern, Western and Southern Portions of Site	Full Site
Excavation	Yes	Yes	No	Yes	Yes	Yes	Yes	Yes
Demolition debris and excavated soils (cubic yards [cy])	288,300 cy	288,300 cy	–	Less	Less	Less	Less	Similar
Construction Duration	7 – 15 years 4 phases	7 – 15 years 4 phases	–	2 years one phase	5.5 years two phases	5.5 years three phases	6.5 years four phases	7 – 15 years 4 phases
Use (gross square feet)	**1,372,270**	**1,476,987**	**469,000**	**831,856**	**1,141,734**	**1,348,702**	**1,267,740**	**1,180,004**
Residential	824,691	978,611	–	187,668	705,179	475,247	811,867	849,521
Office [NOTE A]	49,999	–	338,000 *(office bldg.)* 14,000 *(annex bldg.)*	392,459 *(office bldg.)* 14,000 *(annex bldg.)*	–	402,404 *(office bldg.)*	–	–
Retail	54,117	48,593	–	–	44,306	44,306	44,306	14,995
Daycare	14,690	14,650	11,500	–	14,650	14,650	14,650	–
Storage Space			12,500	–	–	–	–	–
Parking	428,773	435,133	93,000	237,729	377,599	412,095	396,917	315,488
Dwelling Units	**558**	**744**	–	**167**	**534**	**456**	**588**	**629**
Studio+1 bedroom	235	420	–	108	343	321	359	349
2 bedroom	195	196	–	48	117	97	140	167
3 bedroom	101	101	–	11	59	30	64	102
4 bedroom	27	27	–	–	15	8	25	11
Vehicle Parking Spaces	**896**	**970**	**543**	**765**	**746**	**1,132**	**800**	**740**
Residential	558	744	–	167	534	456	588	629
Retail	138	128	–	–	115	69	115	45
Commercial	60	60	–	–	60	–	60	60
Office	100	–	–	585	–	570	–	–
Daycare	29	29	–	–	29	21	29	–
Car Share	11	9	–	13	8	16	8	6

Notes:
NOTE A Existing office uses are inclusive of the accessory uses at the existing office building – the 11,500-gross-square-foot childcare use and 12,500 gross square feet of storage space.

(continued)

	Proposed Project	Project Variant	Alternative A: No Project Alternative	Alternative B: Full Preservation – Office Alternative	Alternative C: Full Preservation – Residential Alternative	Alternative D: Partial Preservation – Office Alternative	Alternative E: Partial Preservation – Residential Alternative	Alternative F: Code Conforming Alternative
								
Freight and Passenger Loading Zones	**10**	**10**	**5**	**6**	**5**	**6** NOTE B	**8**	**10**
On Street (Freight / Passenger)	4 (1 / 3)	4 (1 / 3)	0	1 (1 / 0)	2 (1 / 1)	3 (1 / 2)	3 (1 / 2)	4 (1 / 3)
Off Street	6 (freight)	6 (freight)	5	5 (freight [existing])	3 (freight)	3 (freight)	5 (freight)	6 (freight)
Bicycle Parking Spaces	**693**	**890**	**15**	**257**	**474**	**501**	**551**	**606**
Residential Class 1/Class 2	558 / 56	744 / 75	–	157 / 9	403 / 27	371 / 23	478 / 29	567 / 31
Retail Class 1/Class 2	14 / 33	14 / 37	–	–	6 / 18	6 / 18	6 / 18	2 / 6
Daycare Class 1/Class 2	10 / 10	10 / 10	–	–	10 / 10	10 / 10	10 / 10	–
Office Class 1/Class 2	10 / 2	–	–	81 / 10	–	53 / 10	–	–
***Character-Defining Features of the Property* NOTE C**								
Existing Office Building	Partially Retained	Partially Retained	Retained	Retained	Retained	Retained	Partially Retained	Partially Retained
Site and Landscape	Demolished	Demolished	Retained	Retained	Retained	Partially Retained	Partially Retained	Demolished
Transportation and Circulation Features								
Transportation Demand Management Measures	Yes NOTE D	Yes NOTE D		Yes	Yes	Yes	Yes	Yes
Streetscape Changes								
Curb Cuts								
California Street	1	1	1	1	1	1	1	1
Presidio Avenue	1	1	1	1	1	1	1	1
Masonic Avenue	2	2	None	None	1	1	1	2
Euclid Avenue	None	None	None	None	None	None	1	9
Laurel Street	7	7	2	2	3	6	8	13
Sidewalk Extensions								
Presidio and Masonic avenues (10 to 15 feet)	Yes	Yes	No	Yes	Yes	Yes	Yes	Yes
Euclid Avenue and Laurel Street (10 to 12 feet)	Yes	Yes	No	Yes	Yes	Yes	Yes	Yes
Intersection Improvements								
California and Walnut streets (bulbouts)	Yes	Yes	No	Yes	Yes	Yes	Yes	Yes
California and Laurel streets (bulbouts) NOTE E	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Euclid Avenue and Laurel Street (bulbout)	Yes	Yes	No	No	No	Yes	Yes	Yes

*Notes: **(continued)***

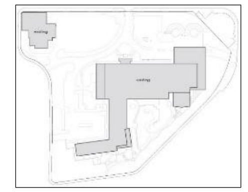
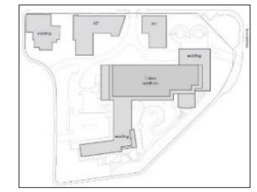
NOTE B Alternative D would increase the length of the proposed commercial freight loading zone from 100 feet to 180 feet.

NOTE C **Retained** – Most, if not all, of the character-defining features to be kept such that the property would convey its historical significance that justify its inclusion in the California Register. **Partially Retained** – Some of the character-defining features to be kept but the element has been demolished or materially altered in an adverse manner and no longer conveys its historical significance that justify its inclusion in the California Register. **Demolished** – Most, if not all, of the character-defining features to be removed such that the element has been demolished or materially altered in an adverse manner and no longer conveys its historical significance that justify its inclusion in the California Register.

NOTE D The measures in the Transportation Demand Management Plan that would be part of the proposed project or project variant (Improve Walking Conditions, Bicycle Parking, Showers and Lockers, Bicycle Repair Station, Car Share Parking, Delivery Supportive Amenities, Onsite Childcare, Multimodal Wayfinding Signage, Real Time Information Displays, Tailored Transportation Marketing, Unbundle Parking) are intended to reduce per capita vehicle miles traveled and may be refined during the planning review process for project entitlements. Alternatives would include these features as applicable.

NOTE E The transit stop shift (from the southwest to the southeast corner of California and Laurel streets) and the construction of a 90-foot-long transit bulbout at the southeast corner has occurred with implementation of the adjacent California Laurel Village Improvement Project and implementation of Muni Forward improvements.

(continued)

	Proposed Project 	**Project Variant** 	**Alternative A: No Project Alternative** 	**Alternative B: Full Preservation – Office Alternative** 	**Alternative C: Full Preservation – Residential Alternative** 	**Alternative D: Partial Preservation – Office Alternative** 	**Alternative E: Partial Preservation – Residential Alternative** 	**Alternative F: Code Conforming Alternative** 
Presidio Avenue/Pine Street/Masonic Avenue (Pine Street Steps and Plaza)	Yes	Yes	No	No	Yes	Yes	Yes	Yes
Masonic Avenue/Euclid Avenue (Corner Plaza)	Yes	Yes	No	No	No	No	No	Yes
Mayfair Drive/Laurel Street (bulbout)	Yes	Yes	No	No	Yes	Yes	Yes	Yes
On-Street Parking Spaces								
Number of Spaces Removed Along Adjacent Streets	36	36	0	5	16	26	32	59
Sustainability Features NOTE F								
LEED Certification Goal	LEED ND Gold	LEED ND Gold	–	LEED ND Gold	LEED ND Gold	LEED ND Gold	LEED ND Gold	LEED ND Gold
Utility Infrastructure								
Connect to existing water, sewer, natural gas, and electrical infrastructure systems (California and Laurel streets and Presidio Avenue)	Yes	Yes	–	Yes	Yes	Yes	Yes	Yes
New water line (connect center building/existing office building to existing water line [Laurel Street])	Yes	Yes	–	No	Yes	Yes	Yes	Yes
New hydrants (center building/existing office building)	Yes	Yes	–	No	Yes	Yes	Yes	Yes
New sewer line (Masonic Avenue)	Yes	Yes	–	No	No	No	No	Yes
New natural gas lines (Euclid and Masonic avenues)	Yes	Yes	–	No	No	No	No	Yes

Notes: ***(continued)***

NOTE F The proposed project and project variant would include non-potable water capture and reuse infrastructure, green roof infrastructure, solar photovoltaic system infrastructure, and roof-mounted solar thermal hot water infrastructure. Alternatives would include these features as applicable.

Source: Laurel Heights Partners, LLC, 2018; Kittelson & Associates, Inc., 2018; SWCA, 2018

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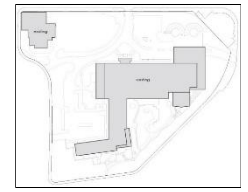
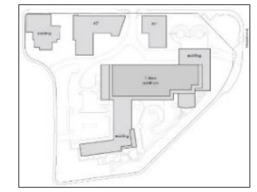
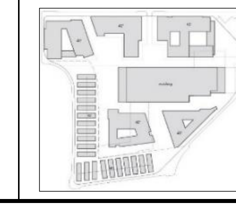
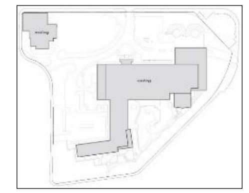
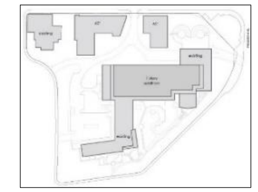
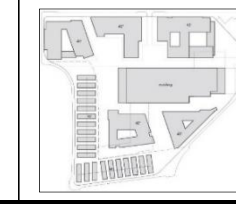
Table S.4: Comparison of Significant Impacts of the Proposed Project, Project Variant, and EIR Alternatives

	Proposed Project	**Project Variant**	**Alternative A: No Project Alternative**	**Alternative B: Full Preservation – Office Alternative**	**Alternative C: Full Preservation – Residential Alternative**	**Alternative D: Partial Preservation – Office Alternative**	**Alternative E: Partial Preservation – Residential Alternative**	**Alternative F: Code Conforming Alternative**
								
Legend: NI = No impact; LTS = Less than significant or negligible impact, no mitigation required; SM = Significant but mitigable; SU = Significant and unavoidable adverse impact, no feasible mitigation; SUM = Significant and unavoidable impact after mitigation; NA = Not Applicable								
Summary of Significant Impacts of the Proposed Project, Project Variant, and Alternatives								
Section 4.B: Cultural Resources (Historic Architectural) Impacts								
CR-1: The proposed project or project variant would materially alter, in an adverse manner, the physical characteristics of the historical resource that justify its inclusion in the California Register of Historical Resources.	SUM	SUM	NI	LTS	LTS	SUM (reduced)	SUM (reduced)	SUM
Section 4.C: Transportation and Circulation Impacts								
TR-2: The proposed project or project variant would cause substantial additional VMT and/or substantially induce automobile travel.	SM	SM	NI	LTS	SM	LTS	SM	SM
TR-4: The proposed project or project variant would result in an adverse transit capacity utilization impact for Muni route 43 Masonic during the weekday a. m. peak hour under baseline conditions.	SUM	SUM	NI	SUM (reduced)	SUM (reduced)	SUM (greater)	SUM (reduced)	SUM (reduced)
C-TR-2:The proposed project's or project variant's incremental effects on regional VMT would be significant, when viewed in combination with past, present, and reasonably foreseeable future projects.	SM	SM	NI	LTS	SM	LTS	SM	SM
Section 4.D: Noise and Vibration Impacts								
NO-1: Construction of the proposed project or project variant would expose people to or generate noise levels in excess of applicable standards or cause a substantial temporary or periodic increase in ambient noise levels.	SUM	SUM	NI	SUM (reduced)	SUM (reduced)	SUM (reduced)	SUM	SUM
NO-2: Construction of the proposed project or project variant would expose structures to or generate excessive groundborne vibration levels but not excessive groundborne noise.	SM	SM	NI	LTS	SM	SM	SM	SM
NO-3: Operation of the proposed project or project variant would result in a substantial permanent increase in ambient noise levels in the immediate project vicinity, or permanently expose persons to noise levels in excess of standards in the San Francisco General Plan and the San Francisco Noise Ordinance.	SM	SM	NI	SM	SM	SM	SM	SM

(continued)

	Proposed Project	Project Variant	Alternative A: No Project Alternative	Alternative B: Full Preservation – Office Alternative	Alternative C: Full Preservation – Residential Alternative	Alternative D: Partial Preservation – Office Alternative	Alternative E: Partial Preservation – Residential Alternative	Alternative F: Code Conforming Alternative
								
Legend: NI = No impact; LTS = Less than significant or negligible impact, no mitigation required; SM = Significant but mitigable; SU = Significant and unavoidable adverse impact, no feasible mitigation; SUM = Significant and unavoidable impact after mitigation; NA = Not Applicable								
Summary of Significant Impacts of the Proposed Project, Project Variant, and Alternatives Identified for Topics in the Initial Study								
Topic E.3, Cultural Resources (Archeological resources, Human Remains, Tribal Cultural Resources) Impacts								
CR-2: Construction activities of the proposed project or project variant could cause a substantial adverse change in the significance of an archaeological resource.	SM	SM	NI	SM	SM	SM	SM	SM
CR-3: Construction activities of the proposed project or project variant could disturb human remains, if such remains are present within the project site.	SM	SM	NI	SM	SM	SM	SM	SM
CR-4: Construction activities of the proposed project or project variant could disturb tribal cultural resources, if such resources are present within the project site.	SM	SM	NI	SM	SM	SM	SM	SM
Topic E.12, Biological Resources Impacts								
BI-1: The proposed project or project variant would have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service; and the proposed project or project variant would interfere substantially with the movement of native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.	SM	SM	NI	SM	SM	SM	SM	SM
Topic E.13, Geology and Soils Impacts								
GE-5: The proposed project or project variant would directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.	SM	SM	NI	SM	SM	SM	SM	SM

Source: Laurel Heights Partners, LLC, 2018, SWCA, 2018

Alternative B: Full Preservation – Office Alternative would be the environmentally superior alternative because it would have the fewest significant environmental impacts from among the alternatives evaluated. Alternative B would retain the existing office building, the annex building, and most of the corporate campus setting and would develop only two new multi-family residential buildings on the 10.25-acre site, and, as a result, it would avoid the significant adverse impact on the historical resource. Because of its reduced land use program, the significant mitigable VMT impact would be less than significant under Alternative B. The significant transit impact, although still significant and unavoidable, would be reduced relative to the proposed project and project variant. Significant noise impacts, while also still significant and unavoidable, would have a reduced duration. Significant but mitigable vibration impacts would be less than significant under Alternative B. Operational noise impacts would be significant but mitigable, similar to but reduced relative to the proposed project and variant. In addition, Alternative B would not result in any new significant impacts or substantially more severe impacts as compared to the proposed project or project variant.

Additionally, Alternative B: Full Preservation – Office Alternative would also lessen the impacts of the proposed project or project variant that were found to be less-than-significant with mitigation, related to the topics of Cultural Resources (archaeological resources including human remains and tribal cultural resources), Biological Resources (nesting birds and protected migratory birds), and Geology and Soils (paleontological resources).

S.4. AREAS OF KNOWN CONTROVERSY AND ISSUES TO BE RESOLVED

The Planning Department received an Environmental Evaluation Application for the proposed project on March 29, 2016. The filing of the application initiated the environmental review process. The Environmental Evaluation Application was revised on March 6, 2017. In accordance with CEQA Guidelines sections 15063 and 15082, the planning department published a NOP of an EIR and Notice of Public Scoping Meeting (Appendix A to this EIR) on September 20, 2017, announcing its intent to prepare and distribute a focused EIR and beginning the formal CEQA scoping process. The 30-day public review period began on September 21, 2017 and ended on October 20, 2017. Pursuant to CEQA Guidelines section 15083, the planning department held a public scoping meeting on October 16, 2017, starting at 6 p.m. at the Jewish Community Center’s Fisher Family Hall at 3200 California Street.

The purpose of the 30-day public review period (or scoping process) is to allow the public and government agencies to comment on the issues and provide input on the scope of the EIR. Individuals and agencies that received these notices include local, regional, and state agencies; property owners and adjacent residents and tenants within 300 feet of the project site; and other potentially interested parties that have requested such notice, including neighborhood organizations. During the public comment period, 54 comment letters, comment cards, and emails were submitted to the planning department and 28 speakers provided oral comments at the public scoping meeting. The planning department published an initial study on April 25, 2018. The initial study included a discussion and analysis of the potential environmental impacts of the proposed project or project variant with respect to all of the topics included in Appendix G of the CEQA Guidelines, as modified by the planning department. Following publication of the initial study, an additional 15 comment letters and emails were submitted to the planning department.

EIR Chapter 1, Introduction, pp. 1.4-1.17, provides summaries of the comments received during the NOP scoping period and following publication of the initial study. The summaries note where the issues are specifically addressed in the EIR or the initial study (EIR Appendix B). On the basis of public comments received, known areas of controversy and issues to be resolved are summarized in Chapter 5, Other CEQA Considerations, under "Areas of Known Controversy and Issues to be Resolved", pp. 5.7-5.8, as follows:

- Loss of neighborhood character
- The duration of the construction period as a burden on the community
- The loss of open green space
- The loss of existing mature on-site trees
- The loss of available on-street and off-street parking supply
- Proposed building heights above existing height limits
- The inclusion of commercial uses in development of the project site, with strong neighborhood support expressed for study of a code-conforming all-residential alternative, and
- The use of transportation network companies by residents, employees, and visitors at the site

Environmental concerns raised in public comment letters have been resolved as part of the project design or through mitigation measures to reduce impacts identified in the EIR impact analyses.

1. INTRODUCTION

Chapter 1, Introduction, presents a summary of the 3333 California Street Mixed-Use Project, outlines the purpose of this Environmental Impact Report (EIR), summarizes the environmental review process, and describes the organization of the EIR.

A. PROJECT SUMMARY

The project site is an approximately 10.25-acre parcel in San Francisco's Presidio Heights neighborhood. The project sponsor, Laurel Heights Partners, LLC, owns the site and leases it to the Regents of the University of California, which uses the site for its University of California, San Francisco (UCSF) Laurel Heights Campus. Prior to the project sponsor's recent acquisition of fee title to the site, the project sponsor had entered into a 99-year pre-paid ground lease with the Regents, the former owner of the site, in 2014. The campus contains a four-story, 455,000-gross-square-foot office building with a three-level, partially below-grade 93,000-gross-square-foot parking garage at the center of the site; a one-story, 14,000-gross-square-foot annex building at the corner of California and Laurel streets; three surface parking lots; and landscaping or landscaped open space. The project site does not include the SF Fire Credit Union building at the southwest corner of California Street and Presidio Avenue, which is on a separate parcel. Current UCSF uses on the Laurel Heights campus are office, research (including limited laboratory uses), and parking as well as an independently operated child care facility.

The project sponsor proposes a mixed-use project for the 3333 California Street site. Under the proposed project, the existing annex building, surface parking lots, and circular garage ramp structures would be demolished. The existing office building would be partially demolished and divided into two separate buildings (Center Buildings A and B), expanded to include new levels, and adapted for residential use. Thirteen new buildings would be constructed in different locations around the site: the Plaza A and Plaza B buildings (residential and retail uses) along California Street between Laurel and Walnut streets; the Walnut Building (office, retail, and child care uses) along California Street east of Walnut Street; the Masonic Building (residential uses) along Masonic Avenue; the Euclid Building (residential and retail uses) near the intersection of Euclid and Masonic avenues; the Laurel Duplexes (residential uses), comprised of seven townhomes, along Laurel Street; and the Mayfair Building (residential uses) near the intersection of Laurel Street and Mayfair Drive. Overall, the proposed project would include 558 dwelling units within 824,691 gross square feet of residential floor area; 49,999 gross square feet of office floor area; 54,117 gross square feet of retail floor area; a 14,690-gross-square-foot child care center; 428,773 gross square feet of parking with 896 parking spaces; and approximately 236,000 square feet of open areas.

Parking would be provided in four below-grade parking garages and six individual, two-car parking garages serving 12 of the 14 units in the Laurel Duplexes group. New public pedestrian walkways are proposed through the site in a north-south direction between California Street and the intersection of Masonic and Euclid avenues approximately along the line of Walnut Street and in an east-west direction between Laurel Street and Presidio Avenue along the line of Mayfair Drive.

A project variant, identified as the Walnut Building Variant, which would replace the office space in the proposed Walnut Building with residential uses, add three new residential floors, and reduce the retail space, is also being considered. Under the project variant there would be 186 additional residential units, for a total of 744 residential units within 978,611 gross square feet of residential floor area; no office space; 48,593 gross square feet of retail floor area; a 14,650-gross-square-foot child care center; 435,133 gross square feet of parking with 970 parking spaces; and approximately 236,000 square feet of open areas on the project site.

B. PURPOSE OF THIS ENVIRONMENTAL IMPACT REPORT

This EIR has been prepared by the San Francisco Planning Department (planning department) in the City and County of San Francisco, the Lead Agency for the proposed project, in compliance with the provisions of the California Environmental Quality Act (California Public Resources Code section 21000 et seq., "CEQA"), the CEQA Guidelines (California Code of Regulations Title 14, section 15000 et seq., "CEQA Guidelines"), and Chapter 31 of the San Francisco Administrative Code. The lead agency is the public agency that has the principal responsibility for carrying out or approving a project.

Pursuant to CEQA Guidelines section 15161, this is a project-level EIR, which examines the physical environmental impacts of a specific development project. As determined and guided by findings of the initial study (see Appendix B to this EIR), this focused EIR evaluates the potential for the proposed project or project variant to cause potentially significant impacts under the environmental topics of cultural resources (historic architectural resources), transportation and circulation, noise and vibration, and air quality. As defined in CEQA Guidelines section 15382, a "significant effect on the environment" is:

> . . . a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance. An economic or social change by itself shall not be considered a significant effect on the environment. A social or economic change related to a physical change may be considered in determining whether the physical change is significant.

On September 27, 2013, Governor Brown signed Senate Bill (SB) 743, which became effective on January 1, 2014. Among other provisions, SB 743 amended CEQA by adding Public Resources Code section 21099 regarding the analysis of aesthetics and parking impacts for certain urban infill projects in transit priority areas.[1,2] The proposed project meets the definition of a mixed-use residential project on an infill site located within a transit priority area as specified by California Public Resources Code section 21099, which provides that "aesthetics and parking impacts of a residential, mixed-use residential, or employment center project on an infill site located within a transit priority area shall not be considered significant impacts on the environment."[3] Accordingly, this EIR does not contain a separate discussion of the topic of aesthetics, which can no longer be considered in determining the proposed project's physical environmental effects under CEQA. The EIR nonetheless provides visual simulations for informational purposes as part of Chapter 2, Project Description (see Figure 2.7 through Figure 2.13 for project renderings, pp. 2.27-2.33). In addition, parking is discussed for informational purposes in Section 4.C, Transportation and Circulation. (See Section 4.A, Introduction to Chapter 4, pp. 4.A.4-4.A.5, for further discussion of SB 743 and California Public Resources Code section 21099.)

This EIR assesses potentially significant impacts of the proposed project and project variant. As stated in CEQA Guidelines section 15121(a), an EIR is an informational document intended to inform public agency decision-makers and the public of the significant environmental effects of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project. CEQA requires that public agencies not approve projects until all feasible means available have been employed to substantially lessen the significant environmental effects of such projects.

Before any discretionary project approvals may be granted for the proposed project or project variant, the San Francisco Planning Commission (planning commission) must certify the EIR as

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1 Senate Bill 743 is available online at https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill id=201320140SB743, accessed May 7, 2018.

2 A "transit priority area" is defined as an area within one-half mile of an existing or planned major transit stop. A "major transit stop" is defined in California Public Resources Code section 21064.3 as a rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods. A map of San Francisco Transit Priority Areas can be found online at http://sfmea.sfplanning.org/Map%20of%20San%20Francisco%20Transit%20Priority%20Areas.pdf, accessed May 7, 2018.

3 San Francisco Planning Department, *Eligibility Checklist: CEQA Section 21099 – Modernization of Transportation Analysis*, 3333 California Street, December 18, 2017. This document and all other documents cited in this EIR, unless otherwise noted, are available for review at the Planning Department, 1650 Mission Street, Suite 400, as part of Case No. 2015-010013ENV and are available online as part of the Assembly Bill 900 Record of Proceedings at www.ab900record.com/3333cal.

adequate, accurate, and objective. EIR adequacy is defined in CEQA Guidelines section 15151, Standards for Adequacy of an EIR, which states:

> An EIR should be prepared with a sufficient degree of analysis to provide decision-makers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The courts have looked not for perfection but for adequacy, completeness, and a good faith effort at full disclosure.

The degree of specificity required in an EIR should "correspond to the degree of specificity involved in the underlying activity which is described in the EIR" (CEQA Guidelines section 15146).

City decision-makers will use the certified EIR, along with other information and public processes, to determine whether to approve, modify, or disapprove the proposed project or project variant, and to require any feasible mitigation measures as conditions of project approval.

C. ENVIRONMENTAL REVIEW PROCESS

On March 29, 2016, the project sponsor submitted an Environmental Evaluation Application for the 3333 California Street Mixed-Use Project to the planning department, which was subsequently revised on March 6, 2017.[4] The environmental review process for the proposed project includes the following: Notice of Preparation (NOP) of an EIR and Notice of Public Scoping Meeting; an Initial Study; a Draft EIR; responses to public and agency comments on the Draft EIR; and certification of the Final EIR. These steps are described in more detail below.

Notice of Preparation of an Environmental Impact Report

On September 20, 2017, the planning department published a Notice of Preparation of an Environmental Impact Report and Notice of Public Scoping Meeting (Appendix A to this EIR), announcing its intent to solicit public comments on the scope of the environmental analysis and to prepare and distribute an EIR on the 3333 California Street Mixed-Use Project. The planning department mailed the Notice of Availability of an NOP and Notice of Public Scoping Meeting to the State Clearinghouse and relevant state and regional agencies; occupants of adjacent properties; property owners within 300 feet of the project site; and other potentially interested parties, including neighborhood organizations that have requested such notice. A legal notice in the newspaper was also published on Wednesday, September 20, 2017.

[4] Laurel Heights Partners, LLC, Environmental Evaluation Application for the 3333 California Street Mixed-Use Project, March 29, 2016 and March 6, 2017.

Public Review of and Comments on the Notice of Preparation

Publication of the NOP initiated a 30-day public review and comment period that ended on October 20, 2017. Pursuant to the California Public Resources Code section 21083.9 and CEQA Guidelines section 15206, the planning department held a public scoping meeting on October 16, 2017, to receive input on the scope of the environmental review for this project.[5] During the NOP review and comment period, a total of 54 comment letters, comment cards, and emails were submitted to the planning department and 28 speakers provided oral comments at the public scoping meeting. The comment letters received in response to the NOP and a copy of the transcript from the public scoping meeting are available for review at the planning department offices as part of Case File No. 2015-014028ENV. The planning department has considered the comments made by the public in preparation of the Draft EIR for the proposed project. Comments on the NOP that relate to environmental issues are summarized below and are addressed in this EIR.

The topics raised in the written and oral comments include, but are not limited to, the following environmental topics: population and housing, cultural resources, transportation and circulation, noise and vibration, air quality, wind and shadow, recreation, utilities and service systems, public services, biological resources, geology and soils, hazards and hazardous materials, mineral and energy resources, cumulative impacts, alternatives, design and aesthetics, the mix of uses, the duration of construction, and merits of the proposed project.

The topics raised in the NOP comment letters and at the public scoping meeting are summarized below and have been addressed in either the initial study published on April 25, 2018 (see EIR Appendix B) or in this EIR. Comments expressing support for, or opposition to, the proposed project or project variant will be considered independently of the environmental review process by City decision-makers as part of their decision to approve, modify, or disapprove the proposed project.

POPULATION AND HOUSING

Comments raised issues concerning the increased population on the project site and effects on infrastructure. These issues are addressed in Topic E.2, Population and Housing, and Topic E.10, Utilities and Service Systems, of the initial study (see EIR Appendix B).

[5] The public scoping meeting was held at the Jewish Community Center of San Francisco at 3200 California Street, San Francisco 94118 on Monday, October 16, 2017, between 6 p.m. and 8 p.m. A transcript of the proceedings is available as part of Case No. 2015-014028ENV.

CULTURAL RESOURCES

Historic Architectural Resources

Comments expressed interest in the protection of historic architectural resources. The proposed project and project variant's impacts on historic architectural resources are addressed in Section 4.B, Historic Architectural Resources, of this EIR. As identified in Impact CR-1, pp. 4.B.40–4.B.46, partial demolition of the Midcentury Modern-designed corporate campus at 3333 California Street under the proposed project or project variant would result in a significant and unavoidable impact on historic architectural resources. Chapter 6, Alternatives, presents a range of alternatives that would meet most of the project objectives and could avoid or substantially lessen significant effects of partial demolition under the proposed project or project variant. Chapter 6, Alternatives, includes preservation alternatives that would retain, in whole or in part, existing elements of the project site.

Archaeological Resources

Comments expressed interest in the effects on archaeological resources and human remains from excavation. In particular, comments stated concern over the potential for extant historic-era subsurface archaeological resources associated with the former Laurel Hill Cemetery. The proposed project's and project variant's impacts on archaeological resources, human remains, and tribal cultural resources are discussed on pp. 125-135 in Topic E.3, Cultural Resources, of the initial study (see EIR Appendix B). Mitigation measures for subsurface archeological resources including human remains and tribal cultural resources have been identified and agreed to by the project sponsor.

TRANSPORTATION AND CIRCULATION

Construction

Comments raised issues concerning construction truck traffic and safety concerns, particularly on Pine Street and Presidio Avenue, as well as cumulative construction transportation impacts. Impact TR-1, pp. 4.C.68-4.C.74, discusses traffic and safety during construction of the proposed project or project variant. Cumulative transportation impacts during construction are discussed under Impact C-TR-1 on pp. 4.C.101-4.C.102.

Traffic Circulation

Comments raised issues related to traffic circulation impacts from increased congestion on streets adjacent to the project site. Public Resources Code section 21099 requires the Office of Planning and Research to study the removal of automobile delay as a metric for evaluating transportation impacts and to develop alternative metrics that better match the state's policies around promoting infill development, promoting public health through active transportation, and reducing GHG emissions. As discussed in Section 4.A, Introduction to Chapter 4, under “Automobile Delay and Vehicle Miles Traveled Analysis” on p. 4.A.5, a resolution adopted by the San Francisco Planning Commission removed automobile delay as a significant impact on the environment and replaced it with a vehicle miles traveled (VMT) threshold for all CEQA analyses going forward. The VMT generated by operation of the proposed project or project variant is discussed in Section 4.C, Transportation and Circulation, of this EIR under Impact TR-2, pp. 4.C.74-4.C.80. Cumulative VMT impacts are addressed under Impact C-TR-2, pp. 4.C.102-4.C.103.

As identified under Impact TR-2, pp. 4.C.74-4.C.80, operation of the proposed project or project variant would cause substantial additional VMT and induced automobile travel due to the provision of parking for the proposed project and project variant retail (retail, restaurant, and commercial) uses. Implementation of Mitigation Measure M-TR-2: Reduce Retail Parking Supply would lessen VMT-related impacts. The VMT impacts of the proposed project or project variant would be considered less than significant with mitigation.

Safety

Comments also expressed concerns about pedestrian safety due to increased traffic. Impacts associated with traffic hazards and pedestrian safety are discussed in Impact TR-3, pp. 4.C.81-4.C.83, and Impact TR-7, pp. 4.C.91-4.C.94. Comments also raised issues related to impacts on emergency services, especially the San Francisco Fire Department, including the effects of proposed changes to the roadways near the Presidio Avenue/Masonic Avenue/Pine Street intersection. These issues are discussed in Impact TR-11, pp. 4.C.99-4.C.100.

Transit

Comments raised issues about the effects of projected growth on transit infrastructure, especially on Muni routes 1 California, 2 Clement, 3 Jackson, 43 Masonic on Presidio Avenue, California Street, and Walnut Street. Impacts of the proposed project or project variant on transit routes are discussed under Impact TR-4, pp. 4.C.83-4.C.88. Cumulative impacts on transit are discussed under Impact C-TR-4, pp. 4.C.105-4.C.108.

Loading

Comments raised issues related to traffic circulation impacts associated with transportation network companies (for-hire vehicles) and delivery services, the adequacy of onsite and offsite commercial and passenger loading spaces generated by the demand from the new mix of uses, and effects of traffic and passenger loading demand on existing passenger loading zones along California Street and the future loading zone on Laurel Street. Freight loading and passenger loading, including for-hire vehicles and delivery services, are discussed in Impact TR-9, pp. 4.C.95-4.C.98, and Impact TR-10, pp. 4.C.98-4.C.99, respectively.

Parking

Comments raised concerns regarding the loss of on-street parking spaces. As discussed above, Public Resources Code section 21099(d) provides that parking is no longer to be considered in determining whether a project has the potential to result in significant environmental impacts for certain infill projects in transit priority areas that meet the established criteria such as the proposed project or project variant. Although the adequacy of parking is no longer a factor in determining the significance of project impacts, a parking discussion is provided for informational purposes only. In addition, the transportation impact analysis considers any secondary physical impacts associated with constrained supply (e.g., queuing by drivers waiting for scarce on-site or on-street parking that affects the public right-of-way) as applicable. For example, the effect of the proposed project's or project variant's parking and loading program, as well as new vehicle trips and streetscape changes, on public rights-of-way in the project vicinity would result in the introduction of new traffic hazards, removal of on-street parking spaces, and VMT increases above projections. The noise and air quality analyses were based on traffic assignments used in the transportation analysis that reasonably address potential secondary effects of drivers searching for parking. Typically, this effect is offset by a reduction in vehicle trips due to others who are aware of constrained parking conditions in a given area. These issues are discussed in Section 4.C, Transportation and Circulation, under Impact TR-2 (VMT), TR-3 (Traffic Hazards), TR-7 (Pedestrians), TR-8 (Bicycle), TR-9 (Commercial Loading) and TR-10 (Passenger Loading) on pp. 4.C.74-4.C.83 and pp. 4.C.91-4.C.99; in Section 4.D, Noise and Vibration, under Impacts NO-4 and NO-5, pp. 4.D.62-4.D.67; and in Section 4.E, Air Quality, under Impacts AQ-1 and AQ-2, pp. 4.E.38--4.E.52. As provided under "Parking Information," on pp. 4.C.116-4.C.126, the absence of a ready supply of parking spaces, combined with available options other than auto travel (e.g., transit service, for-hire services including taxis, bicycles, or walking) and a relatively dense pattern of urban development, induces many drivers to seek and find alternative parking facilities, shift to other modes of travel, or change their overall travel habits. Any such resulting shifts to transit service or other modes (walking and biking) would be in keeping with the City's Transit-First Policy and numerous San Francisco General Plan (general plan) policies.

NOISE AND VIBRATION

Comments expressed the need for long-term and short-term noise measurements to properly determine how the project would affect existing noise conditions. Noise measurements of existing conditions are presented in Section 4.D, Noise and Vibration, in Table 4.D.2: Summary of Long-Term (LT) Noise Monitoring Results in the Project Vicinity, p. 4.D.9, and Table 4.D.3: Summary of Short-Term (ST) Noise Monitoring Results in the Project Vicinity, p. 4.D.10.

Comments raised issues concerning noise impacts over the length of the construction and during overlapping construction phases. Comments also expressed concern about the potential for combined construction- and operations-related noise impacts on nearby residents, other sensitive receptors, and users of the rooftop and courtyard spaces at the Jewish Community Center of San Francisco (JCCSF). Construction-related impacts associated with the proposed project or project variant are discussed in Impact NO-1, pp. 4.D.36-4.D.51, including estimates of construction noise levels at offsite sensitive receptors and peak noise levels during construction, shown in Table 4.D.12, p. 4.D.38, and calculated noise increases over ambient levels during construction, shown in Table 4.D.13, p. 4.D.40. Comments raised concerns over noise impacts resulting from project-generated vehicle trips and programmed events and cumulative development. Noise associated with operation of the proposed project or project variant is discussed in Impact NO-4, pp. 4.D.62-4.D.64.

Comments expressed concerns about construction-related groundborne vibration impacts on existing buildings. Impacts associated with groundborne noise and vibration are discussed in Impact NO-2, pp. 4.D.51-4.D.58.

Comments expressed concerns over the project's cumulative noise impacts. Cumulative noise impacts in the project area during construction and operation are discussed in Impact C-NO-1 and Impact C-NO-2, pp. 4.D.68-4.D.70.

AIR QUALITY

Comments raised issues regarding the length of the construction period and overlapping construction phases and the resulting air quality impacts on nearby residents. Impacts of the proposed project or project variant during the construction period are discussed in Section 4.E, Air Quality, under Impact AQ-1, pp. 4.E.38-4.E.49, and Impact AQ-3, pp. 4.E.52-4.E.60. Comments also expressed concerns over cumulative air quality impacts. Cumulative air quality impacts are discussed in Impact C-AQ-1, p. 4.E.66.

WIND AND SHADOW

Comments expressed concerns related to wind and shadow impacts on public streets and sidewalks and on existing private open space and recreational facilities, including JCCSF's rooftop and courtyard spaces. Comments also raised issues regarding shadow impacts on existing residences surrounding the project site. The proposed project and project variant's impacts on wind and shadow are discussed on pp. 151-162 in Topic E.8, Wind and Shadow, of the initial study (see EIR Appendix B).

RECREATION

Comments raised issues concerning the lack of recreational open space in the neighborhood and how the loss of the grass lawns along Euclid Avenue and along Masonic Avenue near Presidio Avenue would contribute to demand on public parks and recreational facilities. The proposed project and project variant's impacts on recreation are discussed in Topic E.9, Recreation, of the initial study (see EIR Appendix B).

BIOLOGICAL RESOURCES

Comments raised issues concerning the loss of mature onsite trees, the loss of landscaped space on the project site, and the potential loss of areas that could contain rare or endangered plant seeds or rare or endangered plants relevant to the historical significance of the site. Comments also expressed concern regarding the extent to which landscaped space would be replaced by the project. The proposed project and project variant's impacts on biological resources are discussed on pp. 197-204 in Topic E.12, Biological Resources, of the initial study (see EIR Appendix B).

UTILITIES AND SERVICE SYSTEMS

Comments expressed concerns regarding the project's demand on regional water supply and the potential for adverse effects on storm drain capacity or flow. These issues are discussed on pp. 173-182 in Topic E.10, Utilities and Service Systems, of the initial study (see EIR Appendix B).

PUBLIC SERVICES

Comments raised issues concerning the project's effects on police and fire department services. The proposed project and project variant's impacts on fire and emergency medical services and police services are discussed on pp. 189-193 in Topic E.11, Public Services, of the initial study (see EIR Appendix B).

GEOLOGY AND SOILS

Comments expressed concerns regarding the excavation and other site grading activities under the project and their effect on the topography of Laurel Hill. Comments also raised issues concerning the effect of ground settlement on adjacent buildings. The proposed project and project variant's impacts related to geology and soils are discussed on pp. 205-216 in Topic E.13, Geology and Soils, of the initial study (see EIR Appendix B).

HAZARDS AND HAZARDOUS MATERIALS

Comments raised issues concerning the effects of construction of the project, including excavation of contaminated soils containing petroleum, polychlorinated biphenyls, and other contaminants; excavation and effects of undiscovered human remains and contaminated soils on public health; and the potential for airborne contamination from office building demolition. Comments also expressed concerns regarding the potential for contamination from leaking underground storage tanks, and the use of chemicals for water treatment. These issues are discussed on pp. 227-240 in Topic E.15, Hazards and Hazardous Materials, of the initial study (see EIR Appendix B), and supplemented in Section 4.F of this EIR.

MINERAL AND ENERGY RESOURCES

Comments expressed concerns about the project's demand on energy supplies and potential effects on utility service in the project vicinity, especially during peak demand periods. These issues are discussed on pp. 240-246 in Topic E.16, Mineral and Energy Resources, of the initial study (see EIR Appendix B).

CUMULATIVE

Comments raised general concerns regarding the effects of the proposed project in combination with other cumulative development in the immediate neighborhood. The proposed project or project variant's impacts on the environment in combination with reasonably foreseeable projects are discussed in their respective topics of this EIR and the initial study (see EIR Appendix B).

ALTERNATIVES

Commenters requested the study of a code-compliant alternative that includes only residential uses. Alternatives to the proposed project or project variant analyzed in this EIR include alternatives developed to reduce significant environmental impacts of the proposed project or project variant. These alternatives and a code-conforming alternative are described and analyzed in Chapter 6, Alternatives.

DESIGN AND AESTHETICS

Comments expressed concern that the proposed project's architectural style, scale, mass, and choice of building materials would not be compatible with the neighborhood. Comments also raised issues regarding glare impacts from glass façades and project effects on sight lines and views. As noted in the initial study on pp. 105-106, Public Resources Code section 21099(d), effective January 1, 2014, provides that "aesthetics and parking impacts of a residential, mixed-use residential, or employment center project on an infill site located within a transit priority area shall not be considered significant impacts on the environment." Accordingly, aesthetics and parking are not considered in determining if a project has the potential to result in significant environmental impacts for projects that meet all of the following three criteria:

1) The project is in a transit priority area; and
2) The project is on an infill site; and
3) The project is residential, mixed-use residential, or an employment center.

The proposed project meets each of the criteria provided by Public Resources Code section 21099(d), and thus the determination of significance of project impacts under CEQA does not consider aesthetics.[6] For informational purposes, the project description includes renderings of the proposed project.

MIX OF USES

Comments raised concern about the project's increased residential density and changes to existing zoning, height limits, and land uses. Comments also stated that the proposed retail and office uses are not allowed under RM-1 zoning and Resolution 4109. Potential conflicts with applicable land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental impact are discussed on pp. 110-112 in Topic E.1, Land Use and Planning, of the initial study (see EIR Appendix B) and Chapter 3, Plans and Policies, of this EIR.

Some comments expressed support for land use programs other than the proposed project, including support for an all-residential project and support for eliminating office and retail uses from the proposed project. Alternatives to the proposed project, including a code-conforming alternative, are described and analyzed in Chapter 6.

Other comments raised concern about economic effects on local businesses caused by new commercial and office space. As stated in CEQA Guidelines section 15358(b), CEQA requires review of the effects of a project that are related to a physical change to the environment. Social or economic effects alone are not changes in physical conditions, and CEQA Guidelines section 15382 provides that social or economic effects may not be treated as significant effects on the environment. Evidence of social or economic effects (e.g., property values, rent levels, neighborhood demographics, etc.) that do not contribute to, or are not caused by, physical impacts on the environment is not substantial evidence of a significant effect on the environment. However, CEQA Guidelines section 15064(d)(e) provides that a social or economic change related to a physical change may be considered in determining whether the physical change is significant. Additionally, an EIR or other CEQA document must consider the reasonably foreseeable indirect environmental consequences or physical changes resulting from a project's economic or social changes. In short, social and economic effects are only relevant under CEQA if they would result in or are caused by an adverse physical impact on the environment and there is no such evidence here.

CONSTRUCTION DURATION

Comments raised concerns that the construction period would place an intolerable burden on the neighborhood, particularly impacts from noise, air quality, traffic and circulation, parking, and hazardous waste removal. A detailed discussion and illustrations of the preliminary construction

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[6] San Francisco Planning Department, *Eligibility Checklist: CEQA Section 21099 – Modernization of Transportation Analysis*, 3333 California Street, December 18, 2017.

phasing program and the strategies for staging, construction truck traffic, and work in the public right-of-way are described in Chapter 2, Project Description, pp. 2.91-2.99. Construction impacts of the proposed project or project variant associated with transportation and circulation (including construction worker parking), noise, and air quality are discussed in Section 4.C, Transportation and Circulation; Section 4.D, Noise and Vibration; and Section 4.E, Air Quality, respectively. Construction impacts and regulatory processes associated with hazardous materials and waste are discussed on pp. 228-231 in Topic E.15, Hazards and Hazardous Materials, of the initial study (see EIR Appendix B) and Section 4.F, Initial Study Supplement, of this EIR.

MERITS OF THE PROPOSED PROJECT

Comments raised issues concerning the loss of landscaped areas and the loss of open space at Euclid Avenue and Laurel Street and near Masonic and Presidio avenues. Although comments on the merits of the project do not raise issues concerning environmental impacts under CEQA, such comments may be considered and weighed by the decision-makers as part of their decision to approve, modify, or disapprove the proposed project or project variant. This consideration is carried out independent of the environmental review process.

Public Review of and Comments on the Initial Study

On April 25, 2018, the planning department published an initial study (Appendix B), which addresses environmental impacts related to land use and planning; population and housing; subsurface archaeological resources, including human remains and tribal cultural resources; 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; and agricultural and forest resources.

Significant impacts identified in the initial study include impacts on subsurface archaeological resources including human remains and tribal cultural resources; biological resources; and paleontological resources. Mitigation measures identified would reduce these impacts to less-than-significant levels. (See pp. 249-255 in Section F, Mitigation Measures and Improvements Measures, of the initial study [EIR Appendix B].) As part of the review process, significant impacts that cannot be mitigated to a less-than-significant level were identified for the following environmental topics that are addressed in this EIR: historic architectural resources, transportation and circulation, noise, and air quality.

Following publication of the initial study, a total of 15 comment letters and emails were submitted to the planning department. These comment letters are available for review at the planning department offices as part of Case File No. 2015-014028ENV. The planning department has considered the comments made by the public in preparation of the EIR for the proposed project and project variant.

Many of the comments raised on the initial study related to environmental issues reiterate land use and planning, transportation and circulation, noise, air quality, greenhouse gas emissions, wind and shadow, recreation, biological resources, hydrology and water quality, geology and soils, and hazards and hazardous materials concerns previously identified in comments received on the NOP and at the public scoping meeting, as summarized above. To the extent that the comments relate to environmental effects, the topics raised in the initial study comment letters have been addressed in either the initial study (see EIR Appendix B) or in this EIR.

Other comments raised new topics that were not previously identified related to land use and planning, growth inducement, transportation and circulation, air quality, shadow, biological resources, hydrology and water quality, geology and soils, hazards and hazardous materials, greenhouse gas emissions, and merits of the proposed project; these concerns are summarized below.

LAND USE AND PLANNING

Comments raised concerns over conflicts with the general plan including the Urban Design Element and residential design guidelines, zoning regulations, and other policies. Comments also expressed concern that rezoning the site to a Special Use District would infringe on the existing processes, protections, and rules established by current zoning regulations. Conflicts with existing city plans and policies, including the general plan and zoning ordinance, are discussed in Chapter 3, Plans and Policies, of this EIR. Comments presented concerns regarding impacts on the existing character of the project vicinity. However, as provided by Public Resources Code section 21099, the proposed project or project variant's changes to the aesthetic character of the project vicinity are not considered in determining if a project has the potential to result in significant environmental impacts.

TRANSPORTATION AND CIRCULATION

Comments expressed concern over congestion and safety of garage egress on Masonic Avenue and Presidio Avenue. Traffic safety impacts associated with the proposed project or project variant garage egress are discussed in Section 4.C, Transportation and Circulation, under Impact TR-3, pp. 4.C.81-4.C.83. Comments also noted the potential for congestion issues caused by loading along Laurel Street. Impacts associated with commercial freight and passenger loading are discussed under Impact TR-9, pp. 4.C.95-4.C.98. Comments raised concerns regarding the design of garage access and the proposed continental crosswalk on Presidio Avenue. Impacts associated with pedestrian hazards are discussed under Impact TR-7, pp. 4.C.91-4.C.94.

AIR QUALITY

Comments expressed concerns related to air quality effects of demolition and excavation. The legally required construction dust control plan (site is over 0.5 acre) and the asbestos dust mitigation plan (due to presence of serpentinite in the area of proposed excavation) are disclosed as part of the project in Chapter 2, Project Description, under “Preliminary Construction Schedule and Phasing,” pp. 2.91-2.99. These issues are also discussed in Topic E.15, Hazards and Hazardous Materials, pp. 227-237 of the initial study (see EIR Appendix B). A supplementary discussion of regulatory processes associated with hazards and hazardous materials is provided in Section 4.F, Initial Study Supplement, pp. 4.F.2-4.F.13 of this EIR. These requirements are also discussed as part of the air quality impact analysis in Section 4.E, Air Quality, pp. 4.E.38-4.E.49 of this EIR.

GREENHOUSE GAS EMISSIONS

Comments raised concerns regarding the methodology and significance thresholds used to analyze greenhouse gas emissions impacts. Comments noted that the EIR did not quantify greenhouse gas emissions for construction activities such as demolition and excavation or operations. The planning department’s methodology to determine impacts associated with greenhouse gas emissions is discussed in Topic E.7, Greenhouse Gas Emissions, pp. 146-150 of the initial study (see EIR Appendix B).

SHADOW

Comments noted concerns regarding the methodology and significance thresholds presented in the initial study with respect to shadow. Comments also presented concerns regarding shadow on areas not owned by the park department, such as residences, sidewalks, and public service facilities. The methodology and significance criteria for shadow analysis, including a discussion of nearby sidewalks and other existing open space currently open to the public, are discussed in Topic E.8, Wind and Shadow, pp. 151-162 of the initial study (see EIR Appendix B).

BIOLOGICAL RESOURCES

Comments raised concerns that the project could conflict with local policies protecting biological resources and that habitat modifications would adversely affect resident or migratory birds. Additionally, comments suggest that the effect of regulatory compliance cannot be determined because regulators have discretion in applying the applicable regulations. Chapter 2, Project Description, pp. 2.26 and 2.35, and Topic E.12, Biological Resources, pp. 201-202, of the initial study (see EIR Appendix B) describe the project’s bird safety features, which adhere to planning code section 139 requirements and planning department advisory guidelines. Biological impacts associated with the proposed project or project variant are discussed in Topic E.12, Biological Resources, pp. 197-204 of the initial study (see EIR Appendix B).

GEOLOGY AND SOILS

Comments raised concerns over the effects of soil erosion and loss of topsoil. Impacts associated with soil erosion and loss of topsoil are discussed in Topic E.13, Geology and Soils, under Impact GE-2 on pp. 210-211 in the initial study (see EIR Appendix B). Comments also suggested that the reliance on legally required regulatory processes associated with geotechnical considerations is not sufficient for building construction and other site activities such as shoring. Demolition, excavation, and other construction activities and certain legal requirements are discussed in Chapter 2, Project Description, under "Demolition, Excavation, and Soils Disturbance," pp. 2.94-2.100. As discussed on pp. 205-212 of the initial study in Topic E.13, Geology and Soils under Impacts GE-1, GE-3, and GE-4 (see EIR Appendix B), the site does not exhibit any unique geological concerns requiring special considerations beyond those typically encountered with similar construction in San Francisco.

HYDROLOGY AND WATER QUALITY

Comments expressed concerns that the technical background documents describing groundwater depth and groundwater flow direction provide conflicting information, and raised concern over the effects of dewatering. Comments also suggested that project impacts on subsurface drainage flow is not described nor adequately analyzed. The variability of groundwater depths and impacts associated with groundwater recharge are described in Topic E.14, Hydrology and Water Quality, under Impact HY-2, pp. 221-222 of the initial study. Impacts associated with construction-related groundwater dewatering are discussed under Impact HY-1, p. 219 of the initial study (see EIR Appendix B).

HAZARDS AND HAZARDOUS MATERIALS

Comments raised concerns that compliance with legally required regulatory processes associated with hazards and hazardous materials would not be adequate to mitigate hazard impacts on construction workers, nearby residents, and the general public. Impacts associated with hazards and hazardous materials are discussed in Topic E.15, Hazards and Hazardous Materials, p. 227 of the initial study (see EIR Appendix B). A supplementary discussion of regulatory processes associated with hazards and hazardous materials is provided in Section 4.F, Initial Study Supplement, pp. 4.F.2-4.F.11 of this EIR.

GROWTH INDUCEMENT

Comments raised concerns about expansion of public utility services (sewer, water, electricity, etc.) if those services are extended beyond what is necessary to serve uses proposed under the proposed project or project variant. Existing and proposed utility infrastructure to serve the site's proposed new uses is discussed in Chapter 2, Project Description, pp. 2-16-2.17 and pp. 2.88-2.91. The issue of increased use intensity (residents, employees, visitors on the site) and the demand generated on public recreational resources, public services, utilities and service systems, water supply are discussed in the respective topics of the initial study (see EIR Appendix B). Whether the proposed project or project variant would result in growth-inducing impacts associated with expansion of public utilities is discussed in Chapter 5, Other CEQA Considerations, pp. 5.1-5.3 of this EIR.

MERITS OF THE PROPOSED PROJECT

Comments expressed opinions regarding the following: the merits of the zoning change, including allowing a new mix of land uses and increases in height and density; the usability of new on-site open space; the reduction or elimination of existing views from publicly accessible open spaces; and changes to the existing character of the project vicinity. Although comments on the merits of the project do not raise issues concerning environmental impacts under CEQA, such comments may be considered and weighed by the decision-makers as part of their decision to approve, modify, or disapprove the proposed project or project variant. This consideration is carried out independent of the environmental review process.

Draft Environmental Impact Report

This Draft EIR has been prepared in accordance with CEQA and the CEQA Guidelines. It provides an analysis of the project-specific physical environmental impacts of construction and operation of the proposed project and project variant, and the proposed project's or project variant's contribution to the environmental impacts from foreseeable cumulative development in the project site vicinity and the City as a whole, as applicable.

Copies of the Draft EIR are available at the Planning Information Center, San Francisco Planning Department, 1660 Mission Street, 1st Floor, San Francisco, CA 94103. The Draft EIR is available for public review at the San Francisco Main Public Library and the Presidio Branch Library at 3150 Sacramento Street. The Draft EIR is also available for viewing or downloading at the planning department website, http://tinyurl.com/sfceqadocs, by choosing the link for Negative Declarations and EIRs under "Current Documents for Public Review" and searching for Case File No. 2015-014028ENV or 3333 California Street Mixed-Use Project. You may also request that a copy be sent to you by calling (415) 575-9038 or emailing the EIR Coordinator at CPC.3333CaliforniaEIR@sfgov.org.

All documents referenced in this Draft EIR are available for review at the San Francisco Planning Department, 1650 Mission Street, Suite 400, San Francisco, CA 94103, as part of Case File No. 2015-014028ENV, and at the Presidio Branch Library at 3150 Sacramento Street. All documents are also available online at www.ab900record.com/3333cal.

HOW TO COMMENT ON THE DRAFT ENVIRONMENTAL IMPACT REPORT

This Draft EIR was published on November 7, 2018. There will be a public hearing before the planning commission during the approximately 45-day public review and comment period for this EIR to solicit public comment on the adequacy and accuracy of information presented in this Draft EIR. The public comment period for this EIR is November 8, 2018 to December 24, 2018. The public hearing on this Draft EIR has been scheduled before the planning commission for December 13, 2018, in Room 400, City Hall, 1 Dr. Carlton B. Goodlett Place, beginning at 1:00 p.m. or later. Please call (415) 558-6422 the week of the hearing for a recorded message giving a more specific time.

A hearing has also been scheduled on December 5, 2018, in Room 400, City Hall, 1 Dr. Carlton B. Goodlett Place, beginning at 12:00 p.m. or later, before the historic preservation commission in order for the historic preservation commissioners to provide comments to the planning commission on the Draft EIR. Please note that public comments at the historic preservation commission hearing will not be treated as comments on the Draft EIR and will not be responded to in the Responses to Comments document.

In addition, during the public review and comment period, members of the public are invited to submit written comments on the adequacy of the document, that is, whether this Draft EIR identifies and analyzes the possible environmental impacts and identifies appropriate mitigation measures. Those who testify at the hearing on the Draft EIR or submit written comments and who provide an address (mailing or e-mail) will automatically receive a notification when the Responses to Comments document is available on the planning department website. Others may request such notification, or request a CD or paper copy, by contacting the EIR Coordinator, Kei Zushi at (415) 575-9038.

Written comments should be submitted to:

Kei Zushi
San Francisco Planning Department
1650 Mission Street, Suite 400
San Francisco, CA 94103

Or by e-mail to:

CPC.3333CaliforniaEIR@sfgov.org.

Comments must be received by **5:00 p.m.** on **Monday, December 24, 2018**. If attachments are provided as part of an e-mail comment on the Draft EIR, please provide in a text-searchable pdf format, if possible.

Commenters are not required to provide personal identifying information. All written or oral communications, including submitted personal contact information, may be made available to the public for inspection and copying upon request and may appear on the planning department's website or in other public documents.

Only commenters on the Draft EIR will be permitted to file an appeal of the certification of the Final EIR to the San Francisco Board of Supervisors (board of supervisors).

ASSEMBLY BILL 900

The project sponsor has filed an application with the Governor's Office of Planning and Research for certification of the proposed project or project variant as an environmental leadership development project under the Jobs and Economic Improvement through Environmental Leadership Act of 2011 (Assembly Bill 900 or AB 900, as updated to comply with Senate Bill 734 and Assembly Bill 246).[7] The application is available online and was subject to public review from August 24, 2018 through September 24, 2018.[8] The review process for certification is administered and conducted by the Governor's Office of Planning and Research. The California Air Resources Board reviews the calculation methodology and analysis of the project's greenhouse gas emissions.

AB 900[9] provides streamlining benefits under CEQA for environmental leadership development projects and defines an environmental leadership development project as the following:

- The project is residential, retail, commercial, sports, cultural, entertainment, or recreational in nature;
- The project, upon completion, will qualify for Leadership in Energy and Environmental Design (LEED) gold certification or better;
- The project will achieve at least 15 percent greater transportation efficiency than comparable projects;
- The project is located on an infill site and in an urbanized area; and
- For projects within a metropolitan planning organization's jurisdiction for which a sustainable communities strategy or alternative planning strategy is in effect, the infill project is consistent with the general use designation, density, building intensity and applicable policies specified for the project area in either a sustainable communities strategy or an alternative planning strategy, for which the California Air Resources Board

7 California Public Resources Code section 21178 to 21189.3.

8 Governor's Office of Planning and Research, California Jobs (AB 900), *Submitted Applications, 2017092053 – 3333 California Street Project*, http://opr.ca.gov/ceqa/california-jobs.html, accessed September 24, 2018.

9 California Public Resources Code 21178 et. seq. and Governor's Office of Planning and Research, California Jobs (AB 900), *Governor's Guidelines for Streamlining Judicial Review Under the California Environmental Quality Act Pursuant to AB 900, Updated to Comply with Senate Bill 734 and Assembly Bill 246*, http://opr.ca.gov/ceqa/california-jobs.html, accessed September 24, 2018.

> has accepted that the strategy would achieve the greenhouse gas emission reduction targets.[10]

In order for the Governor to certify a leadership project, the project (or project applicant) must: (1) result in a minimum investment of $100 million dollars in California upon completion of construction; (2) create high-wage, highly skilled jobs that pay prevailing wages and living wages and provide construction jobs and permanent jobs for Californians, and help reduce unemployment; (3) not result in any net additional greenhouse gas emissions; (4) comply with requirements for commercial and organic waste recycling; (5) have a binding agreement with the lead agency establishing the requirements set forth in Public Resources Code sections 21183(e) and (g); and (6) agree to pay the costs of the Court of Appeal in hearing and deciding any case.[11,12] Multifamily residential projects certified as environmental development leadership projects are also required to provide unbundled parking, such that private vehicle parking spaces are priced and rented or purchased separately from dwelling units.

As of the publication of this Draft EIR the California Air Resources Board has yet to determine if the proposed project or project variant would result in any net additional greenhouse gas emissions for purposes of certification under AB 900.

In accordance with the requirements of AB 900, the planning department has provided a record of proceedings for the proposed project and project variant that can be accessed and downloaded from the following website: www.ab900record.com/3333cal. The record of proceedings includes the EIR and all other documents and materials submitted to, or relied upon by, the lead agency in the preparation of the EIR or the approval of the project. In addition, a document prepared by the lead agency or submitted by the applicant after the date of the release of the draft EIR that is a part of the record of proceedings, and comments received on the draft EIR, will be made available to the public on this same website in a readily accessible electronic format within the timeframes specified by this act. Comments on this draft EIR should be emailed to CPC.3333CaliforniaEIR@sfgov.org.

Within 10 days of the Governor certifying the proposed project or project variant as an environmental leadership development project, the planning department is required to issue a public notice stating that the applicant has elected to proceed under chapter 6.5 (commencing with section 21178) of the Public Resources Code, which provides, among other things, that any judicial action challenging the certification of the EIR or the approval of the project described in

[10] California Public Resources Code Section 21180(b).
[11] California Public Resources Code Section 21183.
[12] Laurel Heights Partners, LLC, 3333 California Street, Applicant Acknowledgement of Obligations under Public Resources Code Section 21183(e), (f), and (g) with the City and County of San Francisco, August 8, 2018.

the EIR is subject to the procedures set forth in sections 21185 to 21186, inclusive, of the Public Resources Code.

As required by section 21185 of the Public Resources Code, the Judicial Council adopted rules of court that establish procedures applicable to actions or proceedings brought to attack, review, set aside, void, or annul the certification of the environmental impact report for an environmental leadership development project (certified by the Governor pursuant to this act) or the granting of any project approvals that require the actions or proceedings, including any potential appeals therefrom, be resolved, to the extent feasible within 270 days of the filing of the certified record of proceedings with the court. This creates an accelerated timeframe for CEQA litigation. The procedures can be found in California Rules of Court rules 3.2220 to 3.2231.

The provisions of AB 900 apply to projects that have been certified by the Governor as environmental leadership development projects by January 1, 2020. This act remains in effect until January 1, 2021.

Final Environmental Impact Report

Following the close of the Draft EIR public review and comment period, the planning department will prepare and publish a document entitled "Responses to Comments," which will contain a copy of all comments on this Draft EIR and the City's responses to those comments, and any necessary changes to the text, along with copies of the letters received and a transcript of the planning commission public hearing on the Draft EIR. This Draft EIR, together with the Responses to Comments document, will be considered by the planning commission in an advertised public meeting, and then certified as a Final EIR, if deemed adequate. The Responses to Comments document will indicate the date reserved for consideration of EIR certification at the planning commission.

The planning commission and the board of supervisors will use the information in the Final EIR in their deliberations on whether to approve, modify, or deny the proposed project or aspects of the proposed project. If the planning commission and the board of supervisors decide to approve the proposed project or project variant, their approval action must include findings that identify significant project-related impacts that would result; discuss mitigation measures or alternatives that have been adopted to reduce significant impacts to less-than-significant levels; and explain reasons for rejecting mitigation measures or alternatives if any are infeasible for legal, social, economic, technological, or other reasons.

A mitigation monitoring and reporting program (MMRP) must be adopted by the planning commission and the board of supervisors as part of the adoption of the CEQA findings and project approvals by those bodies. The MMRP identifies the measures included in the proposed project or project variant or imposed by the decision-makers as conditions of approval, the entities responsible for carrying out the measures, and the timing of implementation. If significant unavoidable impacts would remain after all feasible mitigation measures are implemented, the approving body, if it elects to approve the proposed project or project variant, must adopt a statement of overriding considerations explaining how the benefits of the proposed project or project variant would outweigh the significant environmental impacts.

D. ORGANIZATION OF THIS EIR

This focused EIR is organized into eight chapters, as described below.

The Summary chapter provides a concise overview of the proposed project and project variant and the necessary approvals; the environmental impacts that would result from the proposed project or project variant; mitigation measures identified to reduce or eliminate these impacts; project alternatives; and areas of known controversy and issues to be resolved.

Chapter 1, Introduction, provides a summary of the proposed project and project variant and describes the type, purpose, and function of the EIR; the environmental review process and comments received on the NOP and Initial Study; and the organization of the EIR.

Chapter 2, Project Description, presents details about the proposed project and project variant and the approvals required for implementation.

Chapter 3, Plans and Policies, describes inconsistencies of the proposed project or project variant with applicable state, regional, and local plans and policies.

Chapter 4, Environmental Setting and Impacts, includes an introductory chapter that describes the format of Chapter 4, a general discussion of the approach to the cumulative analysis, and a subsection on the existing land use setting. Chapter 4 addresses the following topics:

- Cultural Resources (historic architectural resources only),
- Transportation and Circulation (all topics except aviation-related ones),
- Noise (all topics except aviation-related ones), and
- Air Quality (all topics except odors).

Each topic section includes a description of existing conditions with respect to the particular environmental topic (environmental setting); the regulatory framework; the approach to analysis; identification and evaluation of project-specific and cumulative impacts; and mitigation measures and improvement measures, when appropriate.

In response to public comments on the initial study, Chapter 4 also includes a supplement to the initial study describing the regulatory processes associated with hazards and hazardous materials (see Section 4.F, Initial Study Supplement). Section 4.F also identifies minor corrections to the public services (schools only) and mineral and energy resources topics of the initial study.

Chapter 5, Other CEQA Considerations, addresses potential growth-inducing impacts of the proposed project and project variant and identifies significant effects that cannot be avoided if the proposed project or project variant is implemented, as well as significant irreversible impacts of the proposed project and project variant, and areas of known controversy and project-related issues that have not been resolved.

Chapter 6, Alternatives, presents and analyzes a range of alternatives to the proposed project or project variant. Six alternatives are described and evaluated: a No Project Alternative, which is required by CEQA; two Full Preservation Alternatives; two Partial Preservation Alternatives; and a Code-Conforming Alternative. This chapter also identifies the environmentally superior alternative. It discusses alternatives that were considered for analysis in the EIR but rejected, and gives the reasons for their rejection.

Chapter 7, Authors and Persons Consulted, identifies the EIR authors and the agencies, organizations, and individuals consulted during preparation of the Draft EIR. In addition, the project sponsor, their attorneys, and any consultants working on their behalf are listed.

The EIR has seven appendices, as follows:

- Appendix A: Notice of Preparation of an Environmental Impact Report and Notice of Public Scoping Meeting, September 20, 2017
- Appendix B: Initial Study – 3333 California Street Mixed-Use Project (including Water Supply Assessment), April 25, 2018
- Appendix C: Historic Architectural Resources Evaluations
- Appendix D: Transportation and Circulation Calculation Details and Supporting Information
- Appendix E: Noise Measurement and Calculation Data
- Appendix F: Air Quality Calculation Details and Supporting Information
- Appendix G: Alternatives Analysis – Transportation and Circulation

The EIR Appendices are provided on a CD attached to the back cover of this EIR. In addition, the appendices may be viewed by appointment at the planning department in the public viewing area of reception, Suite 400, 1650 Mission Street, San Francisco and at the Presidio Branch Library at 3150 Sacramento Street.

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2. PROJECT DESCRIPTION

A. PROJECT OVERVIEW

INTRODUCTION

The 3333 California Street Mixed-Use Project (proposed project) site is an approximately 446,490-square-foot, or 10.25-acre, parcel bounded by California Street to the north, Presidio Avenue to the east, Masonic Avenue to southeast, Euclid Avenue to the south, and Laurel Street/Mayfair Drive to the west, in San Francisco's Presidio Heights neighborhood, in the northwest portion of San Francisco (see Figure 2.1: Project Location, p. 2.3). The project sponsor, Laurel Heights Partners, LLC, owns the site and leases it to the Regents of the University of California, which uses the project site for its University of California, San Francisco (UCSF) Laurel Heights Campus. Prior to the project sponsor's recent acquisition of fee title to the site, the project sponsor had entered into a 99-year pre-paid ground lease with the Regents, the former owner of the site, in 2014. The project site does not include the San Francisco Fireman's Credit Union (now called SF Fire Credit Union) at the southwest corner of California Street and Presidio Avenue, which is on a separate parcel.

The project site is developed with a four-story, 455,000-gross-square-foot[1] office building including a three-level, 212-space, 93,000-gross-square-foot partially below-grade parking garage at the center of the site; a one-story, 14,000-gross-square-foot annex building at the corner of California and Laurel streets; three surface parking lots with a total of 331 spaces connected by internal roadways; two circular garage ramp structures leading to below-grade parking levels; and landscaping or landscaped open space (see Figure 2.2: Existing Site, p. 2.4). The campus serves as the primary location for UCSF's office and limited laboratory uses for its social, behavioral, and policy science research departments.

The proposed project consists of redevelopment of the site from office, research, child care, and parking uses to a mix of residential, retail, office, child care, and associated parking uses. These proposed uses would be located in 13 new buildings and in the adaptively reused office building, which would be divided into two separate residential buildings (see Figure 2.3: Proposed Site Plan, p. 2.5). Proposed parking would be provided in four below-grade parking garages[2] and six individual, two-car parking garages.[3] The proposed project would require demolition, soils

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1 Gross square footages and square footages presented for the existing and proposed uses are approximate.

2 The below-grade parking garages may be fully or partially integrated; however, the engineering feasibility of internal connections has yet to be determined.

3 The individual parking garages would serve six of the seven townhomes identified as the Laurel Duplexes.

disturbance, and excavation to depths ranging from 7 to 40 feet below the existing grade for construction of the below-grade parking garages, building foundations, and site terracing.

The project site has historically been occupied by large-scale uses. From 1854 to 1946 it was part of the larger Laurel Hill Cemetery (formerly Lone Mountain Cemetery). Laurel Hill Cemetery is listed in the California Register of Historical Resources as California Historical Landmark 760.[4] In 1946, the area was cleared and graded in anticipation of being developed by the San Francisco Unified School District (school district). In April 1953, the Fireman's Fund Insurance Company (Fireman's Fund) purchased the property from the school district. Fireman's Fund constructed the existing buildings and parking garage and developed the overall site in phases between 1955 and 1966, occupying the site from 1957 to 1982 as its corporate headquarters. In 1982, the property was sold and became the Presidio Corporate Center, during which time it underwent office renovations and was occupied with office tenants.

In January 1985, the UC Regents purchased the property and remodeled the space to suit the University's medical and scientific research uses. In July 2014, prior to the project sponsor's recent acquisition of fee title to the site, the project sponsor had entered into a 99-year pre-paid long-term ground lease with the UC Regents, the former owner of the site, allowing for the re-development of the project site. UCSF anticipates moving services and staff at the Laurel Heights Campus to other UCSF locations, such as the Mission Bay or Parnassus campuses prior to commencement of any construction activities.[5]

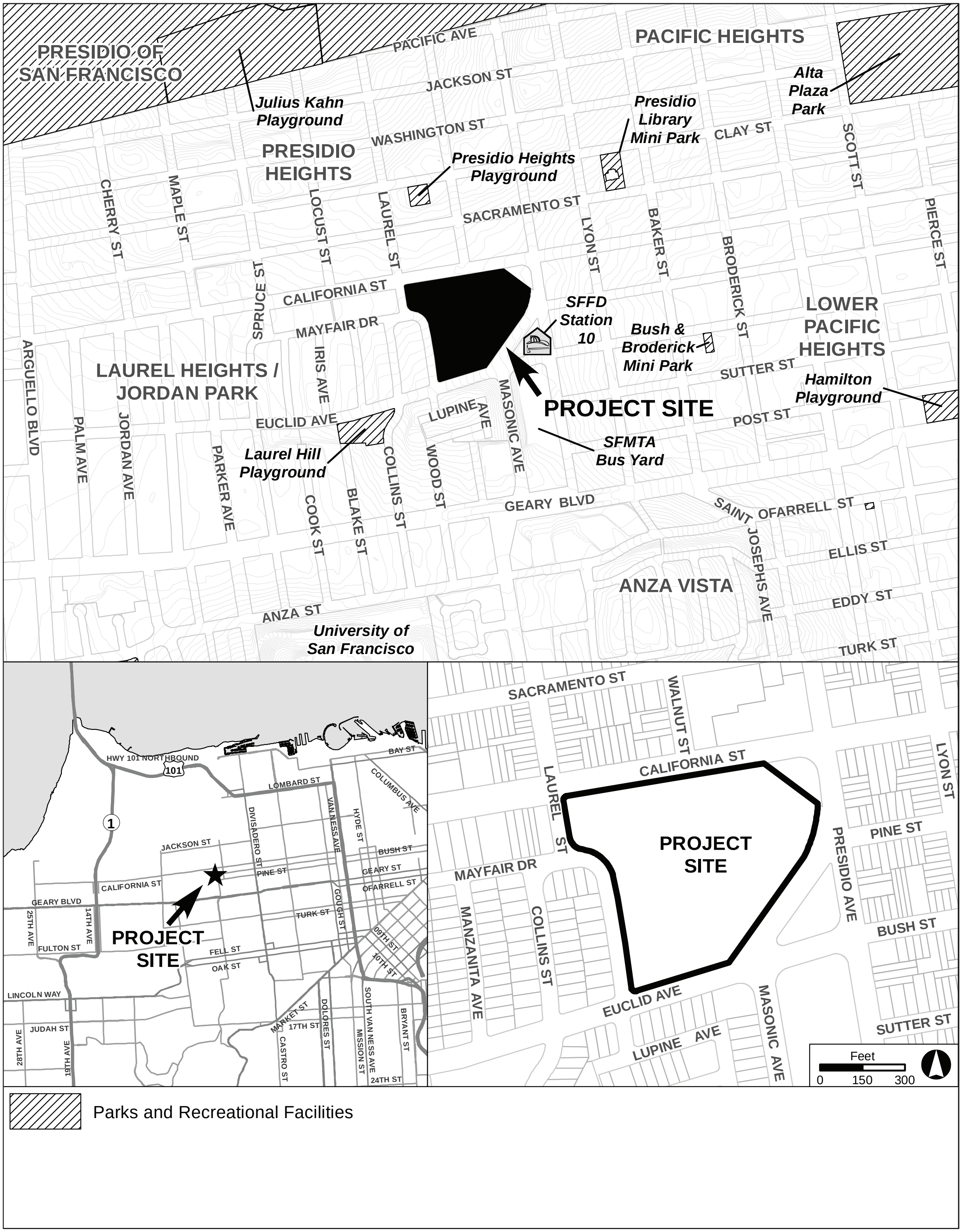
A National Register of Historic Places Registration Form for the Fireman's Fund Insurance Company Office at 3333 California Street was submitted to the California State Historic Preservation Office (SHPO) on February 9, 2018 and updated on April 19, 2018 and resubmitted.[6] The registration form was reviewed by the City and County of San Francisco Historic Preservation Commission, the planning department, and the SHPO. On May 16, 2018 the San Francisco Historic Preservation Commission supported the nomination,[7] and on

[4] Per California Public Resources Code section 5031(a): "All landmark registrations up to and including Register No. 769, which were approved without the benefit of criteria, shall be approved only if the landmark site conforms to the existing criteria as determined by the California Historical Landmarks Advisory Committee or as to approvals on or after January 1, 1975, by the State Historical Resources Commission."

[5] Regents of the University of California, University of California at San Francisco (UCSF) 2014 Long Range Development Plan Environmental Impact Report, p. 3-56, https://www.ucsf.edu/content/lrdp-environmental-impact-report-downloads, accessed May 25, 2018.

[6] Michael Corbett and Denise Bradley, National Register of Historic Places Registration Form for Fireman's Fund Insurance Company Office at 3333 California Street, San Francisco, California submitted to California State Historic Preservation Office, April 19, 2018.

[7] San Francisco Planning Department, Tim Frye, Historic Preservation Officer to the City and County of San Francisco Historic Preservation Commission, 3333 California Street National Register Nomination Certified Local Government Review, May 16, 2018.

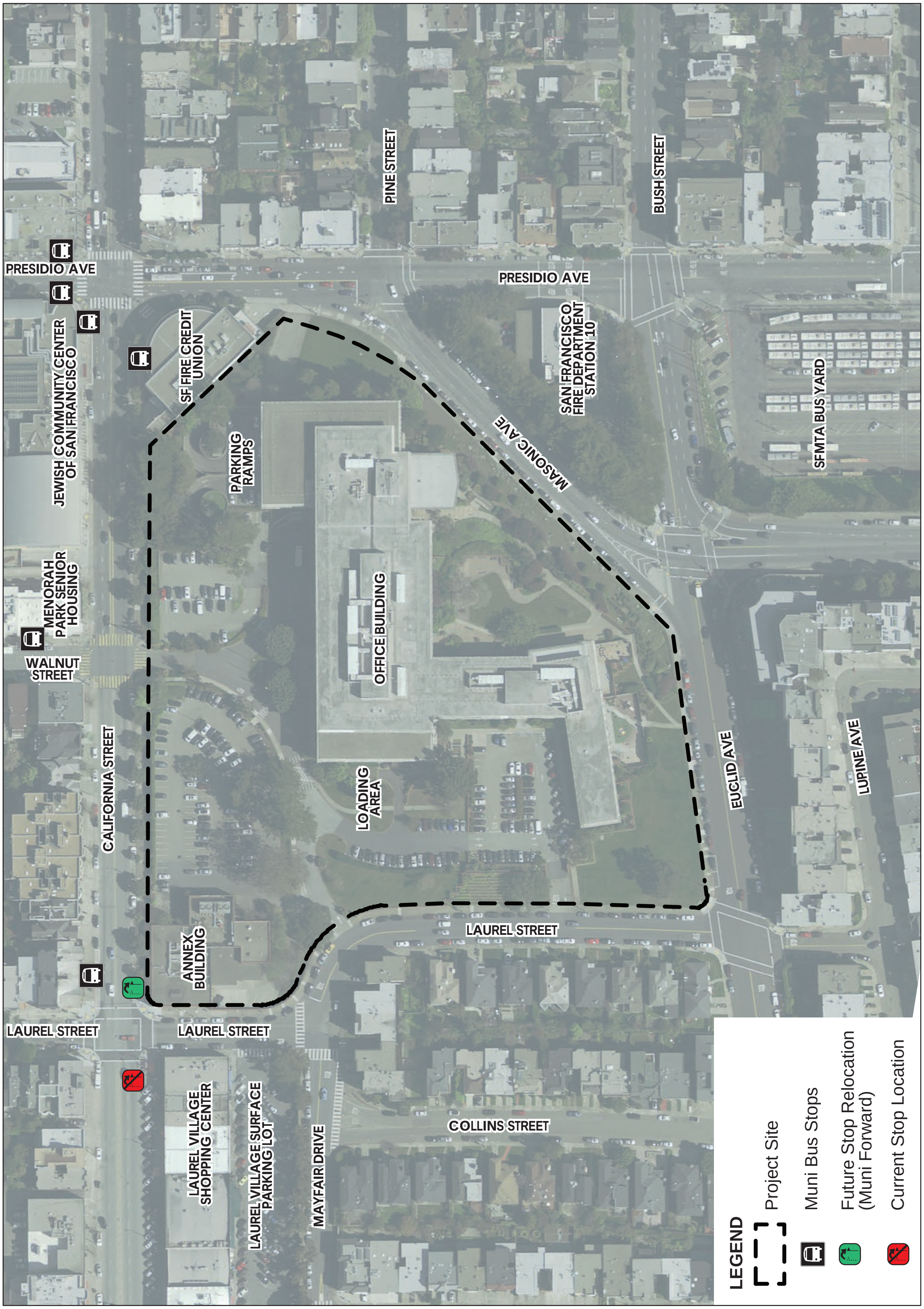


Source: SWCA (2017)

3333 CALIFORNIA STREET MIXED-USE PROJECT

2015-014028ENV

FIGURE 2.1: PROJECT LOCATION



Source: SWCA (2017)

3333 CALIFORNIA STREET MIXED-USE PROJECT

2015-014028ENV

FIGURE 2.2: EXISTING SITE

Source: Laurel Heights Partners, LLC and SWCA (2017)

3333 CALIFORNIA STREET MIXED-USE PROJECT

2015-014028ENV

FIGURE 2.3: PROPOSED SITE PLAN

May 17, 2018, the State Historical Resources Commission determined the property to be eligible for listing in the National Register of Historic Places and approved a motion that the subject property at 3333 California Street be accepted and directed the SHPO to forward the nomination to the Keeper of the National Register for final determination of eligibility.[8,9] The Keeper of the National Register issued a Determination of Eligibility on August 29, 2018.[10,11] Although the property cannot be listed in the National Register without the property owner's consent, the Keeper's Determination of Eligibility automatically lists the property in the California Register.

OVERVIEW OF PROPOSED PROJECT AND PROJECT VARIANT

The project sponsor is requesting rezoning and adoption of a Special Use District, Conditional Use authorization and approval of a planned unit development, and approval of a Development Agreement for a multiphase, mixed-use development on the project site to be developed over a 7- to 15-year construction timeframe. The project site plan is shown in Figure 2.3, p. 2.5. As envisioned, the proposed project would include phased development (four phases) of residential uses (anticipated to include both market-rate and affordable dwelling units), retail uses, office uses, a child care center, parking, streetscape improvements, and open space. The project sponsor is also studying a variant to the proposed project: the Walnut Building Variant that replaces the proposed office use in the Walnut Building with residential uses and less retail space.[12]

Under the proposed project, the existing annex building, surface parking lots, and circular garage ramp structures along California Street would be demolished. The existing approximately 55.5-foot-tall office building at the center of the site (exclusive of the approximately 13-foot-tall mechanical penthouse) would be partially demolished and adapted to serve as two separate buildings, Center Building A and Center Building B, connected by a covered bridge. Dividing the building would allow for the development of a linear north-south connection from California Street to Euclid Avenue through the middle of the project site. The proposed north-south connection would align with Walnut Street (the proposed Walnut Walk) incorporating the site into the surrounding street grid. Center Building A and Center Building B would be renovated,

8 Office of Historic Preservation State Historical Resources Commission, Quarterly Meeting of the California State Historical Resources Commission on May 17, 2018 – Meeting Summary, February 2, 2018 (draft).

9 San Francisco Planning Department, Tim Frye, Historic Preservation Officer to the City and County of San Francisco Historic Preservation Commission, 3333 California Street National Register Nomination Certified Local Government Review, May 16, 2018.

10 National Park Service, National Register of Historic Places, Weekly List of Actions Taken on Properties, August 16, 2018 through August 31, 2018, https://www.nps.gov/subjects/nationalregister/weekly-list-20180831.htm, accessed October 22, 2018.

11 Office of Historic Preservation, Fireman's Fund Insurance Company, Determination of Eligibility National Register of Historic Places, Letter to Dan Safier, Prado Group, September 24, 2018.

12 The project variant is also identified as the Mixed-Use Multi-Family Housing Variant in the technical background studies and background supporting documentation.

adapted for residential use, and strengthened to accommodate vertical additions (see Figure 2.3, p. 2.5). Two residential levels would be added to Center Building A for a building height of approximately 80 feet tall. Two residential levels would be added to the east portion of Center Building B and three residential levels would be added to the west portion, for a building height ranging from approximately 80 feet on the east portion to 92 feet on the west portion. The heights are measured from the proposed residential lobbies adjacent to the proposed Walnut Walk to the top of the roof. A total of 13 new buildings would be constructed along California Street, Masonic Avenue, Euclid Avenue, and Laurel Street, for a total of 15 buildings on site.

The new buildings would consist of the following:

- The Plaza A and Plaza B buildings, two four-story mixed-use residential buildings with ground floor retail along California Street between Laurel and Walnut streets with proposed heights of 45 feet[13]
- The Walnut Building, a three-story mixed-use office building with ground floor retail and child care space along California Street east of Walnut Street with a proposed height of 45 feet
- The Masonic Building, a four- to six-story residential building along Masonic Avenue with a proposed height of 40 feet
- The Euclid Building, a four- to six-story mixed-use residential building with limited ground floor retail and a proposed height of 40 feet. The retail space would front the south end of the proposed Walnut Walk near the intersection of Euclid and Masonic avenues
- The Laurel Duplexes, seven two-unit residential townhomes along Laurel Street with proposed heights of up to 40 feet
- The Mayfair Building, a four-story residential building near the Laurel Street and Mayfair Drive intersection with a proposed height of 40 feet

The proposed project would eliminate approximately 376,000 gross square feet of the existing uses, providing 49,999 gross square feet of office uses on the project site (to be located in the proposed Walnut Building) and renovating portions of the existing office building at the center of the site for residential use (see Table 2.1: Project Summary).

The proposed land use program would be predominantly residential with a mix of other uses (office, retail, and child care) proposed for the Plaza A, Plaza B, and Walnut buildings along California Street and ground-floor retail proposed for the Euclid Building. Overall, 1,372,270 gross square feet of new and rehabilitated space, comprising 824,691 gross square feet

[13] The overall heights referenced above, below and throughout the document are determined as described in Planning Code section 260 or will require a modification to the methodology through the planned unit development approval process.

Table 2.1: Project Summary

Use	Existing		Proposed Project	
	Existing Gross Square Footage or Number of Spaces	Location	Proposed Gross Square Footage or Number of Spaces	Proposed Location
Existing Uses Included in the Proposed Project				
Office	338,000 gsf	Office Bldg.	49,999 gsf	Walnut Building (new construction)
Accessory Office	14,000 gsf	Annex Bldg.	Not Applicable	Not Applicable
Child Care	11,500 gsf	Office Bldg.	14,690 gsf	Walnut Building (new construction)
Storage Spaces	12,500 gsf	Office Bldg.	Not Applicable	Not Applicable
Structured Parking	93,000 gsf	Parking Garage	428,773 gsf 93,000 gsf retained or moved	Center Building B Garage (two parking levels retained) NOTE A
			335,773 gsf new	California Street, Masonic, Mayfair, and Laurel Duplex garages (new construction)
Parking Spaces	543 spaces NOTE B (212 in garage plus 331 on surface lots)	Parking Garage and 3 surface lots	896 spaces NOTE C	Center Building B, California Street, Masonic, Mayfair, and Laurel Duplex garages
Freight Loading Spaces	5 spaces	West side of Office Bldg.	6 spaces	California Street Garage (3 spaces), Masonic Garage (3 spaces)
Bicycle Spaces	15 spaces	Parking Garage	693 spaces (592 class 1 and 101 class 2)	Center Buildings A and B and all new buildings (class 1) California Street, Masonic Avenue, Euclid Avenue, center of site (class 2)
Open Area	165,200 square feet NOTE D	See Note D	236,000 square feet NOTE E	Throughout project site, including California Plaza, Cypress Square, Mayfair and Walnut Walks, Presidio Overlook, Pine Street Steps and Plaza, Masonic Plaza, Euclid Green
New Uses Introduced by the Proposed Project				
Residential	None	Not Applicable	824,691 gsf	Throughout site (reuse and new construction total)
			189,919 gsf (adaptive reuse of Office Bldg.)	Center Buildings A and B (renovated Office Bldg. with additional floors)
			634,772 gsf new	Plaza A, Plaza B, Masonic, Euclid, and Mayfair buildings and Laurel Duplexes (new construction)
			558 dwelling units	All buildings except Walnut Building
Retail	None	Not Applicable	54,117 gsf	Plaza A, Plaza B, Walnut, and Euclid buildings (new construction)

Use	Existing		Proposed Project	
	Existing Gross Square Footage or Number of Spaces	**Location**	**Proposed Gross Square Footage or Number of Spaces**	**Proposed Location**
On-Street Commercial and Passenger Loading Zones	0	Not Applicable	4 zones (conversion of 15 parking spaces)	California Street and Laurel Street (1 commercial zone) Masonic Avenue, Euclid Avenue, Laurel Street (3 passenger zones)
TOTAL GROSS SQUARE FOOTAGE / NUMBER OF SPACES	**Existing:** **469,000 gsf / 543 spaces**		**Proposed Project:** **1,372,270 gsf / 896 spaces**	

Notes:

A With the adaptive reuse of Center Building B, a portion of Basement Level B1 and all of Basement Level B3 under the eastern portion of the existing office building would be retained for parking and integrated with the proposed California Street Garage (under the proposed Plaza A, Plaza B, and Walnut buildings) and, potentially, with the new below-grade parking under the proposed Masonic, Euclid, and Mayfair buildings.

B There are five existing car-share spaces in Basement Level B1 of the structured parking garage.

C Parking would include 11 car-share spaces and 26 Americans with Disabilities Act accessible spaces. Pursuant to San Francisco Green Building Code sections 4.106.4 and 5.106.5 up to 8 percent of parking spaces would be developed with electric vehicle charging stations and other spaces would be electric vehicle ready.

D Open area includes 51,900 square feet of existing privately owned open space. The existing green lawns at the corner of Euclid Avenue and Laurel Street (23,600 square feet) and along Presidio Avenue (10,700 square feet) are accessible to the general public. The internal private open spaces on the south and east sides of the existing office building (a 4,500-square-foot child care play space and a 13,100-square-foot private courtyard) are for UCSF's exclusive use. The remaining approximately 113,300 square feet of open area are inaccessible planted or landscaped areas. Open area does not include existing surface parking lots (approximately 139,000 square feet).

E Includes all landscaped areas and common open space and private open space for the proposed residential uses. A portion of the common open space would be open to the public. Private and common open space would be provided for each of the proposed new buildings and the renovated Center A and Center B Buildings as part of the development of each of these buildings and as part of the overall open space framework.

Source: Laurel Heights Partners, LLC; BAR Architects; SCB; Jensen (August 2017)

of residential floor area with 558 dwelling units; 49,999 gross square feet of office floor area; 54,117 gross square feet of retail floor area; and a 14,690-gross-square-foot child care center use would be developed under the proposed project.

The proposed project would provide 896 off-street parking spaces, 353 more than are now on the site. There would be four separate below-grade parking garages with access to 884 spaces, and six individual, two-car parking garages with access to 12 spaces for the Laurel Duplexes[14], as follows:

- Renovated below-grade parking levels (Basement Levels B1 and B3) under Center Building B

[14] Twelve of the fourteen proposed residential units in the Laurel Duplexes would have twelve parking spaces (one per residential unit) in the six independently accessible, two-car parking garages while the remaining two residential units would have two spaces in the proposed Masonic Garage.

- A below-grade parking garage under the Plaza A, Plaza B, and Walnut buildings with two and three levels (California Street Garage)
- Two below-grade, single-level parking garages with one under the Masonic and Euclid buildings and southern portion of the proposed Walnut Walk (Masonic Garage) and the other under the Mayfair Building (Mayfair Garage)

The proposed project would include affordable housing units as required under planning code section 415 and/or as set forth in a development agreement for the proposed project between the project sponsor and the City. The terms of the development agreement regarding provision of affordable housing and other matters are still under discussion, and, in addition, the project sponsor is gathering community input regarding this matter.

The project sponsor would seek amendments to the Zoning Height and Bulk District Map and the Special Use District Map, San Francisco Planning Code text amendments, and a waiver or modification of any applicable conditions of Planning Commission Resolution 4109 (Resolution 4109 [described in detail below on pp. 2.24-2.26]) in order to create a new special use district (SUD) applicable to the project site.[15] The SUD would establish certain land use zoning controls for the project site, including office and retail uses at the project site as permitted uses. In addition, the project sponsor is seeking approval of a conditional use authorization/planned unit development to permit development of buildings in excess of 50 feet in height, to provide for minor deviations from the provisions for measurement of height, to allow additional dwelling unit density (under the project variant), and to allow certain planning code exceptions. Under these approvals, height limits would remain at 40 feet except along California Street, where height limits would be increased from 40 to 45 feet to accommodate higher ceilings for ground-floor retail uses, and at the center of the site (from 40 feet to 80 and 92 feet) for the renovated buildings resulting from the adaptive reuse of the existing office building, which is approximately 55.5 feet tall as measured along the north elevation to the top of the roof (exclusive of the approximately 13-foot-tall mechanical penthouse).

Currently, the project site is a single legal parcel known as Block 1032, Lot 003. The project sponsor will seek approval from the City of a phased subdivision map pursuant to the Subdivision Code of the City and County of San Francisco (section 1300 et. seq. of the City and County of San Francisco Municipal Code). The subdivision map(s) would facilitate the subdivision of the existing parcel into separate legal parcels and would reserve the right to further subdivide the parcels into, for example, condominium units.

The proposed project would widen the existing 10-foot-wide sidewalks on Presidio and Masonic avenues (adjacent to the project site) to meet the recommended widths identified in the Better Streets Plan (15 feet). The existing sidewalks on Euclid Avenue (10.5 feet wide) and Laurel

[15] City and County of San Francisco, City Planning Commission Resolution 4109, November 13, 1952.

Street (10 feet wide) would be widened to meet the minimum widths identified in the Better Streets Plan (12 feet). The proposed project would include other streetscape changes such as plazas, corner bulbouts, new street trees, and other landscaping as part of a series of proposed improvements along Presidio Avenue, Masonic Avenue, Euclid Avenue, Laurel Street and Mayfair Drive. The proposed improvements would result in changes to the intersections of Presidio Avenue/Masonic Avenue/Pine Street, Masonic Avenue/Euclid Avenue, and Mayfair Drive/Laurel Street. Overall, approximately 53 percent of the project site (approximately 236,000 square feet – excluding rooftop space reserved for living (or green) roofs and solar photovoltaic systems) would be retained as open area. Approximately 103,000 square feet of the project site would be developed as common open space with portions open to the public, e.g., the proposed Mayfair and Walnut walks, Cypress Square, Presidio Overlook, and Euclid Green (discussed below, pp. 2.80-2.86). Private and common useable open spaces[16] for use by future residents and building users (e.g., child care use) would be developed in the form of balconies, rooftop decks, terraces, and courtyards.

The project sponsor is also considering the Walnut Building Variant, a variant to the proposed project that would change the use of the proposed 263,453-gross-square-foot Walnut Building from a mixed-use office building to a mixed-use residential building (see pp. 2.99-2.103). Under the project variant, the office use in the proposed Walnut Building would be replaced with residential uses, the retail floor area would be reduced, and the child care use would be retained but slightly reduced. With this project variant, 744 dwelling units would be developed on the project site (186 more than the proposed project) and 970 vehicle parking spaces, including nine car-share spaces (one fewer than the proposed project), would be provided in the below-grade parking garages (74 more than the proposed project). Under the project variant, the height of the proposed Walnut Building would be approximately 67 feet (three more levels [or 22 feet taller] than under the proposed project, requiring a change to the 40-foot height limit) to accommodate the new residential use. Under the project variant the proposed Walnut Building would be approximately 368,170 gross square feet with a residential floor area of approximately 153,920 gross square feet, a retail floor area of 18,800 gross square feet, an approximately 14,650-gross-square-foot child care center, and an approximately 180,800 gross-square-foot parking garage. Overall, 1,476,987 gross square feet of new and rehabilitated space, comprising 978,611 gross square feet of residential floor area; 48,593 gross square feet of ground floor retail spaces; and 14,650 gross square feet of child care center space would be developed under the Walnut Building Variant.

[16] Planning Code section 135 sets forth the requirements for private and common usable open space.

B. PROJECT SPONSOR'S OBJECTIVES

Laurel Heights Partners, LLC, seeks to achieve the following objectives by undertaking the proposed project or project variant:

- Redevelop a large underutilized commercial site into a new high quality walkable mixed-use community with a mix of compatible uses including residences, neighborhood-serving ground floor retail, on-site child care, potential office/commercial uses, and substantial open space.
- Create a mixed-use project that encourages walkability and convenience by providing residential uses, neighborhood-serving retail, on-site child care, and potential office/commercial uses on site.
- Address the City's housing goals by building new residential dwelling units on the site, including on-site affordable units, in an economically feasible project consistent with the City's General Plan Housing Element and ABAG's Regional Housing Needs Allocation for the City and County of San Francisco.
- Open and connect the site to the surrounding community by extending the neighborhood urban pattern and surrounding street grid into the site through a series of pedestrian and bicycle pathways and open spaces, including a north-south connection from California Street to Euclid Avenue that aligns with Walnut Street and an east-west connection from Laurel Street to Presidio Avenue.
- Create complementary designs and uses that are compatible with the surrounding neighborhoods by continuing active ground floor retail uses along California Street east from the Laurel Village Shopping Center, adding to the mix of uses and businesses in the area, and providing activated, neighborhood-friendly spaces along the Presidio, Masonic and Euclid avenue edges compatible with the existing multi-family development to the south and east.
- Provide a high quality and varied architectural and landscape design that is compatible with its diverse surrounding context, and utilizes the site's topography and other unique characteristics.
- Provide substantial open space for project residents and surrounding community members by creating a green, welcoming, walkable environment that will encourage the use of the outdoors and community interaction.
- Incorporate open space in an amount equal to or greater than that required under the current zoning, in multiple, varied types designed to maximize pedestrian accessibility and ease of use.
- Include sufficient off-street parking for residential and commercial uses in below-grade parking garages to meet the project's needs.
- Work to retain and integrate the existing office building into the development to promote sustainability and eco-friendly infill redevelopment.

C. PROJECT LOCATION AND SITE CHARACTERISTICS

The approximately 446,490-square-foot, or 10.25-acre, project site occupies Lot 003 on Assessor's Block 1032 in San Francisco's Presidio Heights neighborhood in the northwest portion of San Francisco (see Figure 2.1, p. 2.3). The irregularly shaped parcel is bounded by California Street to the north (an approximately 730-foot-long frontage), Presidio Avenue to the east (an approximately 280-foot-long frontage), Masonic Avenue to southeast (an approximately 422-foot-long frontage), Euclid Avenue to the south (an approximately 348-foot-long frontage), and Laurel Street/Mayfair Drive to the west (an approximately 742-foot-long frontage). The two-story building that houses the SF Fire Credit Union, located on a triangular-shaped lot at the northeast corner of Assessor's Block 1032 (corner of California Street and Presidio Avenue), is on a separate parcel and is not part of the project site.

Along California Street, the project site is bordered by an approximately 10-foot-tall brick wall with a pedestrian entrance and curb cut for the California Street entrance. The brick wall is set back 5 feet from the north property line, with a planting strip in the setback. At the corner of Laurel and California streets, the brick wall joins with the one-story annex building to wrap around the corner and along Laurel Street. It continues to border the project site to the west, with a pedestrian entrance and curb cut for the Mayfair entrance. South of the Mayfair entrance, the wall is set back behind a formally landscaped, stepped slope and terminates immediately north of the Laurel Street entrance. The existing office building has a brick perimeter wall along its Presidio Avenue and Masonic Avenue frontages and is set back at least 36 feet from the east (Masonic Avenue) property line. The eastern portion of the project site has a substantial number of mature trees, landscaping, and open space.

Approximately 63 percent of the site is covered by buildings or other impermeable surfaces (e.g., internal roadways and surface parking lots) and 37 percent is landscaping or landscaped open space. The project site's topography exhibits a generally southwest-to-northeast trending downslope. From its high point of 308 feet San Francisco City Datum[17] at the southwest corner (Euclid Avenue and Laurel Street) the site slopes downward to the north and east toward California Street and Presidio Avenue with a grade change of approximately 65 feet. The average slope gradient on the site is approximately 20 percent. However, the slope gradient varies from 5 to 15 percent on the northern portion of the site to greater than 20 percent on the southern portion. The project site is located in an area with known or suspected hazardous materials from former underground storage tanks and naturally occurring asbestos in bedrock beneath the site.

[17] San Francisco City Datum establishes the City's zero point for surveying purposes at approximately 8.6 feet above the mean sea level established by the 1929 U.S. Geological Survey datum.

EXISTING LAND USES

SITE VICINITY

The project site is in the Laurel Heights/Jordan Park area of San Francisco's Presidio Heights neighborhood. It is adjacent to the Pacific Heights and Western Addition[18] neighborhoods (to the east) and just north of the Anza Vista area of the Inner Richmond neighborhood. The parcel is located within an RM-1 Zoning District[19] and a 40-X Height and Bulk District. Low- to mid-rise residential uses surround the project site to the north, east, south, and west across California Street, Presidio Avenue, Euclid Avenue, and Laurel Street. Other land uses near the site include the SF Fire Credit Union, at the southwest corner of California Street and Presidio Avenue, adjacent to the project site; the Jewish Community Center of San Francisco (JCCSF), at the northwest corner of California Street and Presidio Avenue, across the street from the project site; San Francisco Fire Station No. 10, across Masonic Avenue southeast of the project site; the San Francisco Municipal Railway's (Muni) Presidio Division and Yard at 875 Presidio Avenue (a bus storage, maintenance depot, and administration building, across Euclid and Masonic avenues south of the project site); and the Laurel Village Shopping Center along California Street, across Laurel Street west of the project site.

PROJECT SITE

At the center of the project site is a four-story, 455,000-gross-square-foot office building that includes a three-level, 93,000-gross-square-foot partially below-grade parking garage (see Figure 2.2, p. 2.4). The existing office building was originally constructed in 1956-1957 and has north, south, and east wings. Between 1963 and 1966, the office building was expanded and a parking garage was constructed under the east wing. Due to the site's slope, the existing office building has three partially below-grade floors on the south and east elevations (along Masonic and Presidio avenues) and four above-grade floors on the north and west elevations (along California and Laurel streets). The building is approximately 55.5 feet tall as measured along the north elevation to the top of the roof (exclusive of the approximately 13-foot-tall mechanical penthouse).

Floors 1 through 4 and Basement Level B1 of the existing office building are devoted to approximately 349,500 gross square feet of office space for UCSF administrative, academic research, and social and behavioral science department uses (including limited laboratory uses,

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[18] This portion of the Western Addition neighborhood is also referred to as Lower Pacific Heights.

[19] The RM-1 Zoning District is designed to accommodate a mixture of houses and apartment buildings of generally low densities and a variety of building forms and sizes. In addition to residential uses, the RM-1 district also allows residential care facilities, child care facilities, group housing, and religious orders.

common areas and space for accessory uses and support programs, such as a child care center, a conference center/auditorium, and a cafeteria). The University Child Care Center at Laurel Heights is operated by Bright Horizons, and is licensed to serve 116 children. It is located in the building's south wing, with pick-up/drop-off accessed via the Laurel Street surface parking entrance closest to Euclid Avenue. An outdoor courtyard at the south end of the building is used as child play space (approximately 4,500 square feet).

The parking garage currently contains 93,000 gross square feet of parking (212 spaces) and circulation space on Basement Levels B1 through B3, 12,500 gross square feet of storage space on Basement Levels B1 through B3,[20] two electrical substations on Basement Level B2, and a 250-kilowatt/480-kilovolt-ampere emergency diesel generator on Basement Level B1. Diesel fuel for the emergency diesel generator is stored in a 1,000-gallon above-ground storage tank located immediately east of Basement Level B2.

A 14,000-gross-square-foot, one-story annex building is located on the northwest corner of the project site (at the corner of California and Laurel streets). The annex building houses the boilers, chillers, and water treatment facilities for the existing office building, other plant operations systems, office space for the physical plant engineers, and unused laboratory office space.

Three surface parking lots, two circular garage ramp structures that lead to below-grade parking levels, and landscaping or landscaped open space make up the remainder of the project site as described below.

EXISTING PARKING, CIRCULATION AND LOADING

The project site has three surface parking lots (331 spaces) located on the northern and western portions of the site, and a three-level, partially below-grade parking garage (212 spaces) located on the northeast corner of the site, for a total of 543 parking spaces. There are five freight loading spaces in the off-street freight loading dock, located at grade on the west end of the existing office building. This loading dock is used by service vehicles for all deliveries, for trash/waste pick-up, and for limited hazardous waste pick-up. Five car-share spaces and 15 bike parking spaces are provided on Basement Level B1 of the garage. There are approximately 102 on-street vehicle parking spaces (including two on-street car-share spaces along Euclid Avenue near Laurel Street) and no loading spaces along the curbs adjacent to the site.

The surface parking lots and the parking garage are connected by an internal roadway system and the circular garage ramp structures north of the existing office building's east wing. The surface parking lots, parking garage, and off-street freight loading dock can be accessed via the main

[20] San Francisco Planning Department, Letter of Determination re: 3333 California Street, March 5, 2015, pp. 11-21.

entrance on California Street through an existing 28-foot-wide curb cut with one inbound lane and one outbound lane. The intersection of California and Walnut streets and the project site main entrance is controlled by a four-way traffic signal. The Mayfair Drive (22-foot-wide curb cut) and Laurel Street (22-foot-wide curb cut) access driveways have one inbound lane and one outbound lane, with the outbound lane controlled by a stop sign. Access to the existing parking garage is also available from the Presidio Avenue driveway (28-foot-wide curb cut). Pedestrian access to the campus is provided at California Street, Laurel Street, and Euclid Avenue, and an internal sidewalk system leads to the existing office building's entrances along its north and west façades.

The surface parking lot on the northeast portion of the project site (east of the Walnut Street extension) is a 60-space paid public parking area used primarily by neighborhood residents and visitors and for overflow parking from the JCCSF across California Street. The surface parking lots on the northwestern (near the annex building) and western (along the western edge of the existing office building) portions of the project site as well as the existing parking garage are reserved for UCSF staff and require payment for monthly parking permits. Vehicular pick-up and drop-off for the child care center and freight loading operations occur along the western edge of the existing office building. Commercial trucks weighing over 3 tons are required to use the California Street entrance rather than the Laurel Street or Mayfair Drive entrances.

The project site is well-served by Muni transit service with the 1 California and 2 Clement bus routes on California Street; the 3 Jackson bus route on Presidio Avenue, California Street, and Walnut Street; and the 43 Masonic bus route on Presidio Avenue.[21] Outbound Muni bus stops are located at the northwest corner of California Street and Presidio Avenue for the 1 California, 2 Clement, 3 Jackson, and 43 Masonic, and at the northeast corners of California and Laurel streets for the 1 California and 2 Clement bus routes. Inbound bus stops are located at the southeast corner of California and Laurel streets and the southwest corner of California Street and Presidio Avenue for the 1 California and 2 Clement bus routes, the northeast corner of California Street and Presidio Avenue for the 43 Masonic bus route, and the east side of Walnut Street mid-block between California and Sacramento streets for the 3 Jackson bus route (see Figure 2.2, p. 2.4). During the weekday commute hours, the transit stops on California Street are also served by Muni express bus service (1BX California B Express).

The UCSF Laurel Heights Campus is served by UCSF's free inter-campus shuttle service, which connects the Laurel Heights Campus to all the other UCSF Campus sites as well as to select secondary campus locations. UCSF's Tan and Black shuttle routes, which operate with 20-minute headways, access the project site via the California Street entrance, stop at the shuttle bus stop near the main entrance to the existing office building (along its north side), and exit via Laurel

[21] In the vicinity of the project site, the outbound direction for the Muni routes on California Street is west; for routes on Presidio Avenue, it is south. The inbound direction for routes on California Street is east; for routes on Presidio Avenue, it is north.

Street/Mayfair Drive. UCSF's free inter-campus shuttle service is not available to the general public.

EXISTING INFRASTRUCTURE SYSTEMS

POTABLE WATER SYSTEM

The San Francisco Public Utilities Commission (SFPUC) provides potable water to the project site via 8-inch-diameter water lines that run underneath California Street and Euclid Avenue.[22] Other water lines in the vicinity of the project site include a 20-inch-diameter water line under California Street and 8-inch-diameter water lines under Presidio Avenue and Laurel Street. This system also provides low-pressure water for firefighting purposes from both California Street and Euclid Avenue. On the sidewalks immediately adjacent to the project site there are a total of three fire hydrants, one fire hydrant at each of the following intersections: California Street/Laurel Street, Masonic Avenue/Euclid Avenue, and Euclid Avenue/Laurel Street. There are up to 10 low-pressure fire hydrants located in the project site vicinity on opposite sides of Laurel and California streets and Presidio, Masonic, and Euclid avenues. The project site is not located in any of the seven sub-areas on the west side of San Francisco (e.g., Golden Gate Park and the Presidio) to which the City provides recycled (reclaimed) water.

WASTEWATER AND STORMWATER SYSTEM

The project site is served by the City's combined stormwater and sanitary sewer system (combined sewer system) operated by the SFPUC. The project site is located within the Bayside (eastern) drainage basin of San Francisco's combined sewer system. There is a 12-inch-diameter gravity sewer line under California Street that expands to 21 inches at the California Street/Walnut Street intersection, a 12-inch-diameter gravity sewer line under Presidio Avenue, an 8-inch-diameter gravity sewer line under Euclid Avenue that expands to 12 inches at the Masonic Avenue/Euclid Avenue intersection, and an 8-inch-diameter gravity sewer line under Laurel Street.[23] These sewer lines convey the combined stormwater and wastewater flows from the project site to the Southeast Water Pollution Control Plant for treatment prior to discharge to San Francisco Bay in accordance with the Bayside National Pollutant Discharge Elimination System permit for the Southeast Water Pollution Control Plant, North Point Wet Weather Facility, and all of the Bayside wet-weather facilities (Bayside NPDES Permit).

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[22] BKF, Laurel Heights Utility Plan (Existing), February 22, 2017 and Summary of Laurel Heights Initial Utility Investigation, September 12, 2014.

[23] Ibid. South of the Pine Street/Presidio Avenue intersection the sewer line under Presidio Avenue is 16 inches in diameter.

ELECTRICITY AND NATURAL GAS

Electrical service to the project site is provided by Pacific Gas & Electricity (PG&E) via a 12-kilovolt electrical distribution circuit.[24] The circuit runs underground in a 5-inch-diameter conduit from California Street (east of Walnut Street) into the project site that connects to the two electric substations in the existing parking garage. This line extends through the project site to the annex building via the electric substations and conduit located within an existing approximately 2,700-gross-square-foot mechanical tunnel that connects to Basement Level B1. Natural gas is delivered to the annex building through a 2-inch natural gas line that connects to the PG&E-owned 6-inch-diameter natural gas line under California Street.[25]

EXISTING LANDSCAPING AND OPEN SPACE

The project site has partially wooded and landscaped areas along its perimeter. The approximately 195 trees on the site are comprised of 48 different tree species, with New Zealand Christmas, Purple Leaf Plum, Olive, and Monterey Cypress as the most represented tree species.[26] There are a number of mature trees, e.g., Coast Redwood and Canary Island Pine trees in the open space closest to Presidio Avenue; Coast Redwood, English Oak, and Atlas Cedar trees in the open space just north of the circular garage ramp structures near California Street; Monterey Pine, Monterey Cypress, and Eucalyptus trees in the surface parking lots near California Street; Coast Live Oak trees near the existing Laurel Street and Mayfair Drive vehicular entrances; a Monterey Pine tree in the open space near the intersection of Laurel Street and Euclid Avenue; and an English Yew tree in the open space just west of the existing office building's south wing near Laurel Street. The project site does not contain any landmark trees, but it does have 19 significant trees as defined in the City's Urban Forestry Ordinance.[27,28] Additionally, there are 15 existing street trees along the site's California Street frontage; the Presidio Avenue, Masonic Avenue, Euclid Avenue, and Laurel Street frontages have no street trees.

There is approximately 165,200 square feet of open area on the project site with approximately 51,900 square feet of accessible open space and approximately 113,300 square feet of space in inaccessible planted areas, such as the formally landscaped area at the midblock of Laurel Street and the steeply sloped and densely-planted area along the southeastern portion of the site. Open

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[24] Ibid.

[25] Ibid.

[26] SBCA Tree Consulting, Arborist Report – Laurel Heights 3333 California St. Tree Survey Report, October 19, 2015 (amended), p. 1.

[27] San Francisco Department of the Environment, Landmark Trees in San Francisco, July 2016, https://sfenvironment.org/sites/default/files/fliers/files/official_list_of_landmark_trees_updated july_2016.pdf, accessed February 27, 2017.

[28] Significant trees are those trees within the jurisdiction of the public works department, or trees on private property within 10 feet of the public right-of-way, that meet certain size criteria (Public Works Code, Article 16, section 810(A)(a)).

area does not include existing surface parking lots (approximately 139,000 square feet). There are approximately 34,300 square feet of grass lawns at the corner of Euclid Avenue and Laurel Street, extending partially down Euclid Avenue (approximately 23,600 square feet), and at Presidio Avenue just north of the Masonic Avenue and Pine Street intersection (approximately 10,700 square feet). When UCSF owned the project site, it allowed the general public to have access to the grass lawns, and, as the current tenant of the project site, UCSF continues to do so. Following UCSF's departure from the site, the project sponsor intends to continue to allow such access until construction activities commence, at which time the grass lawns would be temporarily closed and eventually replaced with those portions of the proposed project's privately owned open space that will be accessible to the public per the terms of the development agreement. The remaining open space (approximately 17,600 square feet) is internal private open space: the approximately 13,100-square-foot landscaped courtyard, adjacent to the west side of the office building, and the approximately 4,500-square-foot outdoor children's play space, adjacent to the south side of the office building.

D. PROPOSED PROJECT CHARACTERISTICS

The proposed project would redevelop the project site with a mix of residential, retail, office, child care, open space, and parking uses. The existing 14,000-gross square-foot annex building and the two circular garage ramp structures would be demolished, and the existing 455,000-gross-square-foot office building, which includes a three-level, 93,000-gross-square-foot partially below-grade parking garage, would be partially demolished. The three existing surface parking lots would be removed, and the existing parking spaces would be relocated to new or renovated below-grade parking structures. The proposed project would include the adaptive reuse of the existing office building at the center of the site for residential uses (as Center Building A and Center Building B) and the construction of 13 new buildings along the California Street, Masonic Avenue, Euclid Avenue, and Laurel Street edges: the Plaza A, Plaza B, Walnut, Masonic, and Euclid buildings; the Laurel Duplexes; and the Mayfair Building. (See Figure 2.3: Proposed Site Plan, p. 2.5; Figure 2.4: Proposed Center Building A and Center Building B Elevations; Figure 2.5: Proposed California Street and Presidio/Masonic Avenue Elevations; and Figure 2.6: Proposed Euclid Avenue and Laurel Street Elevations.) The proposed renovated and new buildings are described in more detail in the following sections.

Overall, the proposed project would include 558 dwelling units within 824,691 gross square feet of residential floor area. All of the renovated or new buildings, except the Walnut Building, would contain residential uses. The proposed project would also provide 49,999 gross square feet of office floor area (in the proposed Walnut Building); 54,117 gross square feet of retail floor area (in the proposed Plaza A, Plaza B, Walnut, and Euclid buildings); and a 14,690-gross-square-foot child care center use (in the proposed Walnut Building). (See Table 2.2: Characteristics of Proposed Buildings on the Project Site.)

Source: Laurel Heights Partners, LLC (2017)

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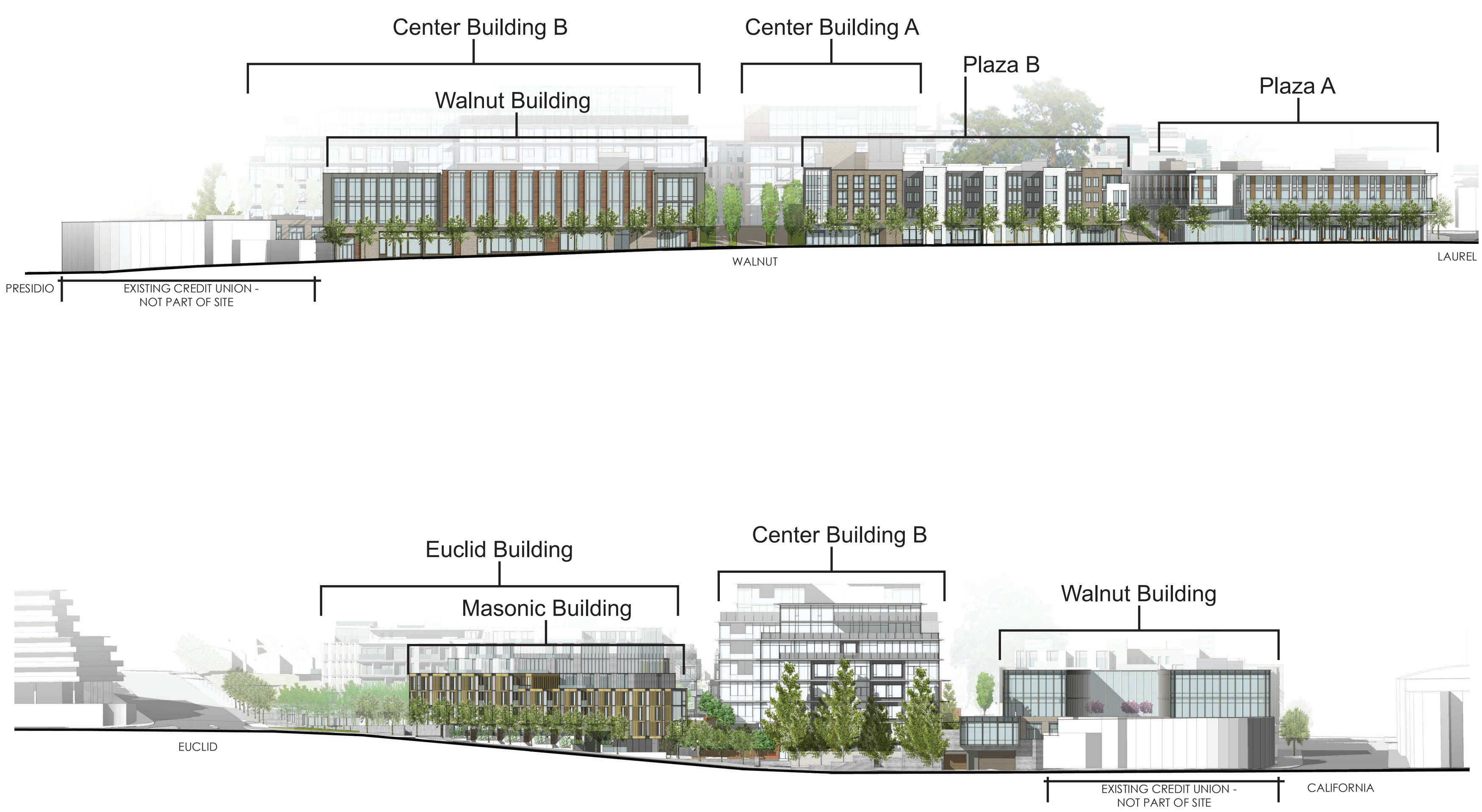
FIGURE 2.4: PROPOSED CENTER BUILDING A AND CENTER BUILDING B ELEVATIONS



Source: Laurel Heights Partners, LLC (2017)

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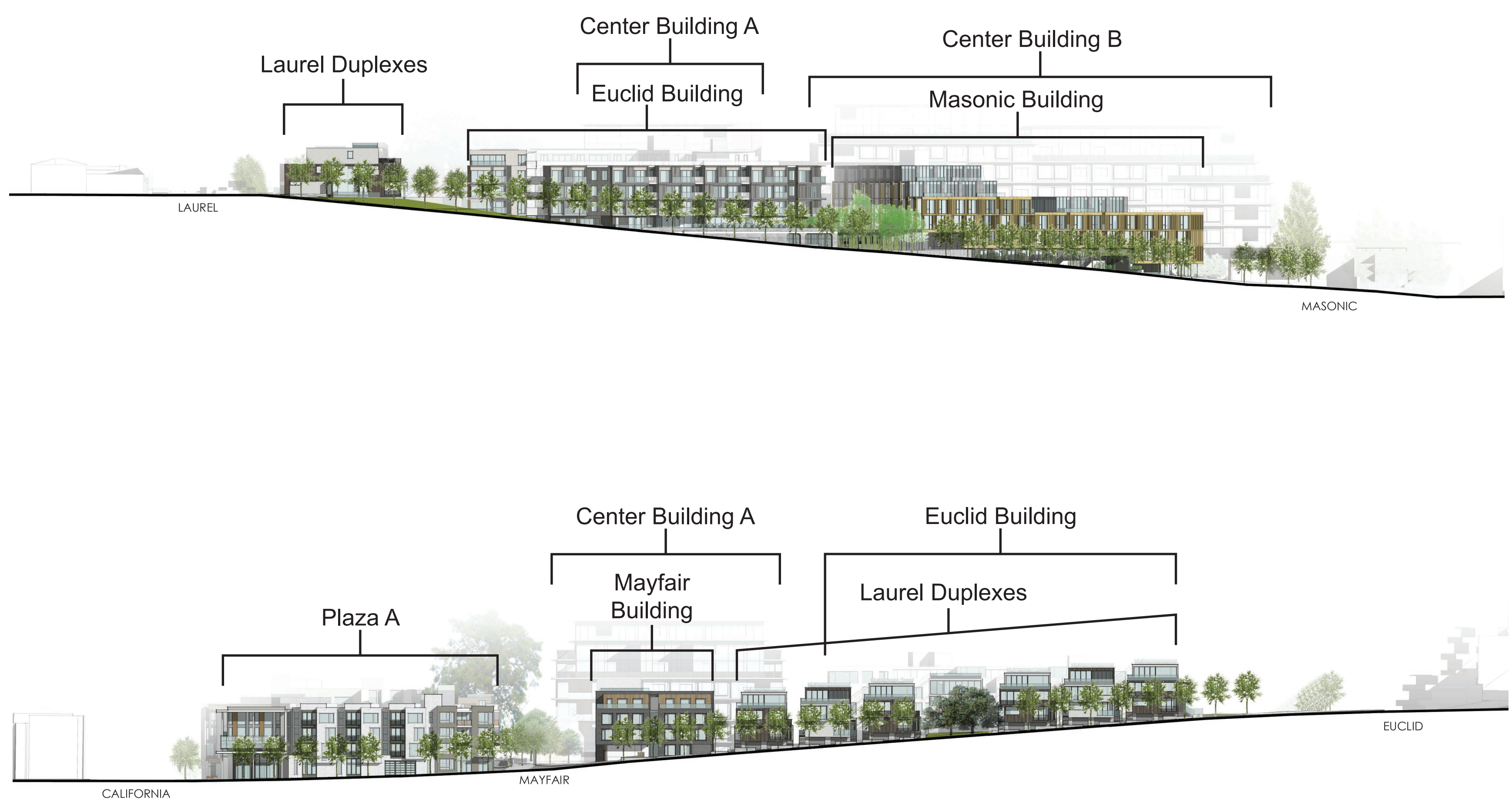
FIGURE 2.5: PROPOSED CALIFORNIA STREET AND PRESIDIO/MASONIC AVENUE ELEVATIONS



Source: Laurel Heights Partners, LLC (2017)

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FIGURE 2.6: PROPOSED EUCLID AVENUE AND LAUREL STREET ELEVATIONS

Table 2.2: Characteristics of Proposed Buildings on the Project Site

Building Characteristics	Center Bldg. A	Center Bldg. B	Plaza A Building	Plaza B Building	Walnut Building	Masonic Building	Euclid Building	Laurel Duplex (7)	Mayfair Building	Totals
Location	Center of Site (Office Bldg. Renovation)		California Street (New Construction)			Presidio/Masonic/Euclid (New Construction)		Laurel Street (New Construction)		
Building Height	80 ft.	80 – 92 ft.	45 ft.	45 ft.	45 ft.	40 ft.	40 ft.	37 - 40 ft.	40 ft.	--
Number of Stories	6	6 - 7	4	4	3	4 - 6	4 - 6	4	4	--
Use (gsf)	**89,465**	**252,681**	**144,878**	**145,618**	**263,453**	**124,892**	**233,623**	**58,839**	**58,821**	**1,372,270**
Residential	89,465	233,423	66,150	72,220	0	88,906	177,345	54,111	43,071	824,691
Office	0	0	0	0	49,999	0	0	0	0	49,999
Retail	0	0	14,178	11,328	24,324	0	4,287	0	0	54,117
Child Care	0	0	0	0	14,690	0	0	0	0	14,690
Parking	0	19,258	64,550	62,070	174,440	35,986	51,991	4,728	15,750	428,773
Dwelling Units	**51**	**139**	**67**	**61**	**0**	**61**	**135**	**14**	**30**	**558**
Studio+1 bedroom	24	50	40	30	0	27	50	0	14	235
2 bedroom	11	51	23	25	0	24	54	1	6	195
3 bedroom	10	29	4	6	0	10	31	1	10	101
4 bedroom	6	9	0	0	0	0	0	12	0	27
Vehicle Parking Spaces	**51** [Note A]	**139** [Note A]	**170**	**95**	**177**	**61**	**148**	**14** [Note B]	**30**	**896** [Note C]
Residential	51	139	67	61	0	61	137	12	30	558
Retail	0	0	43	34	48	0	13	0	0	138
Commercial	0	0	60	0	0	0	0	0	0	60
Office	0	0	0	0	100	0	0	0	0	100
Child Care	0	0	0	0	29	0	0	0	0	29
Bicycle Parking Spaces [Note D]	**56**	**153**	**96**	**77**	**40**	**67**	**156**	**15**	**33**	**693**
Residential Class 1/Class 2	51 / 5	139 / 14	67 / 7	61 / 6	0	61 / 6	135 / 14	14 / 1	30 / 3	558 / 56
Retail Class 1 [Note E]/Class 2	0	0	10 / 12	0 / 10	4 / 4	0	0 / 7	0	0	14 / 33
Child Care Class 1/Class 2	0	0	0	0	10 / 10	0	0	0	0	10 / 10
Office Class 1/Class 2	0	0	0	0	10 / 2	0	0	0	0	10 / 2

Notes:

A Parking for Center Buildings A and B would be provided in Basement Levels B1 and B3 under Center Building B (32 spaces), in Basement Level B1 of the proposed California Street Garage (106 spaces), and in Basement Level B1 of the proposed Masonic Garage (52 spaces).

B The two parking spaces for the Laurel Duplex without a private parking garage would be located within the proposed Masonic Garage.

C Includes the 11 car-share spaces and 26 Americans with Disabilities Act accessible spaces. Pursuant to San Francisco Green Building Code sections 4.106.4 and 5.106.5 up to 8 percent of parking spaces would be developed with electric vehicle charging stations and other spaces would be electric vehicle ready.

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

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

Source: Laurel Heights Partners, LLC; BAR Architects; Solomon Cordwell Buenz; and Jensen Architects (August 2017)

Four below-grade parking garages would provide 884 parking spaces serving all buildings on the project site except six of the seven Laurel Duplexes.

Parking for six of the Laurel Duplexes would be in six garages, each with 2 parking spaces (one for each residential unit), accessed via six separate driveways on Laurel Street (each with a 10-foot-wide curb cut). The seventh Laurel Duplex would have two parking spaces in the Masonic Garage. Thus, there would be a total of 896 parking spaces on the project site.

The proposed project would provide 592 class 1 bicycle parking spaces and 101 class 2 bicycle parking spaces.[29] The proposed project would include 8 freight loading spaces: 6 off-street freight loading spaces in two separate off-street loading docks and one on-street 100-foot-long commercial truck (yellow) loading zone along California Street. Three on-street 60-foot-long passenger (white) loading zones would also be requested along Laurel Street and Masonic and Euclid avenues.

PROPOSED PLANNING CODE AMENDMENTS

The project as proposed is not consistent with the provisions set forth in the planning code for the RM-1 Zoning District and would not comply with development restrictions identified in Resolution 4109, described below.[30] The existing office use within the project site, as well as the scale of the existing office building within the project site, does not conform to the low-density residential character described for the RM-1 Zoning District. In 1952, the property was reclassified from a First Residential District to a Commercial District pursuant to Resolution 4109, which allowed the property to be redeveloped as an office campus pursuant to the Commercial District Zoning controls. At the time, the school district owned the property and was the party seeking the zoning reclassification. Resolution 4109 contained additional conditions applicable to development of the property for commercial uses (including restrictions on the size of the commercial buildings; a requirement for one parking space per 500 square feet of commercial space; and a requirement that there be no large commercial buildings within 100 feet of Euclid Avenue and 100 feet of Laurel Street/Mayfair Drive). Resolution 4109 also contained separate, additional conditions applicable to development of residential buildings on the property (including restrictions on residential buildings within 100 feet of Euclid Avenue and 100 feet of

[29] Class 1 bicycle parking facilities are spaces in secure, weather-protected facilities intended for use as long-term, overnight, and workday bicycle storage by dwelling unit residents, non-residential occupants, and employees. Class 2 spaces are bicycle racks located in publicly-accessible, highly visible locations intended for transient or short-term use by visitors, guests, and patrons to the building or use. Class 2 bicycle racks allow the bicycle frame and one wheel to be locked to the rack (with one u-shaped lock), and provide support to bicycles without damage to the wheels, frame, or components (Planning Code section 155.1).

[30] City and County of San Francisco, City Planning Commission Resolution 4109, November 13, 1952.

Laurel Street/Mayfair Drive; restrictions limiting residential buildings to one- to two-family unit buildings no more than 40 feet in height on parcels no less than 3,300 square feet in size with 50 percent or less site coverage along Laurel Street and Euclid Avenue; requirements that there be a minimum distance of 12 feet between adjacent units, and a minimum setback distance of 10 feet from Laurel Street; and a requirement that there be no residential building on other portions of the subject property with a ground coverage in excess of 50 percent of the area allotted to the building).

The school district subsequently sold the property to Fireman's Fund Insurance Company (FFIC). FFIC redeveloped the property from 1955 to 1957 for commercial uses as its corporate headquarters in conformance with the Commercial District zoning and the additional conditions of Resolution 4109. The property's Commercial District zoning was changed to R-4 in 1960 and to RM-1 in 1978 as part of separate City-wide rezoning programs. The property is currently zoned RM-1. The property has been used for offices since its development in 1955-1957 and is currently used for UCSF administrative and research offices. Because the RM-1 zoning does not permit office uses, the current use of the property for offices is considered a legal, non-conforming use.[31]

The proposed project would include amendments to the planning code and zoning maps. These legislative changes would be sought to accommodate the proposed retail and office uses in the Walnut Building; the proposed retail uses in the Plaza A, Plaza B, and Euclid buildings; and the height limit changes for the renovated buildings and the new buildings that would be taller than 40 feet (at the center of the site and along California Street).

These changes would be implemented through the creation of a SUD that would modify existing land use zoning controls for the project site, including a waiver or modification of any applicable conditions of Resolution 4109. Establishment of the SUD would require the Planning Commission's recommendation of the required Height and Bulk District Map amendment, the Special Use District Map amendment, and of the SUD to the Board of Supervisors. In addition, the project sponsor would seek approval of a conditional use authorization/planned unit development to permit development of buildings in excess of 50 feet in height; to allow for more units than principally permitted in the RM-1 Zoning District; and to allow certain planning code exceptions.

Zoning map amendments would include changes to Sheets HT03 and SU03, which would be amended, respectively, to show the changes from the current heights to the proposed heights and to show the boundaries of the SUD. Maximum height limits would remain at 40 feet on the site except along California Street, where height limits would be increased from 40 to 45 feet, and at the center of the site, where height limits would be increased from 40 to 80 and 92 feet for the

[31] San Francisco Planning Department, Letter of Determination re: 3333 California Street, March 5, 2015.

renovated buildings (the adaptive reuse of the existing office building, which is approximately 55.5 feet tall as measured along the north elevation to the top of the roof [exclusive of the approximately 13-foot-tall mechanical penthouse]).

It is anticipated that the project sponsor would seek approval of a development agreement between the City and the project sponsor (which requires recommendation for approval by the Planning Commission and approval by the Board of Supervisors) with respect to, among other community benefits, the project sponsor's commitment to the amount of affordable housing developed as part of the proposed project or project variant and to develop and maintain privately owned, publicly accessible open space, and would vest the proposed project's or project variant's entitlements for a 15-year period.

PROPOSED PROJECT COMPONENTS

The proposed project would consist of the physical separation of the existing building at the center of the site into two renovated buildings and the construction of 13 new buildings along the California Street, Presidio Avenue, Masonic Avenue, Euclid Avenue, and Laurel Street frontages. The project site would be integrated with the surrounding land uses and circulation network through the development of physical and visual connections from Walnut Street south to Masonic and Euclid avenues, and from Mayfair Drive east to Presidio Avenue, Masonic Avenue, and Pine Street. The proposed north-south pedestrian promenade (Walnut Walk) and the proposed east-west pedestrian promenade (Mayfair Walk) would be open to the public and would provide the primary points of access to the common open spaces, plazas, squares, and vista points within the project site that would also be available for public use. Renderings of the proposed project from various publicly accessible viewpoints along the perimeter of the project site are shown on Figure 2.7: View of Proposed Plaza A, Plaza B, and Walnut Buildings Along California Street (Looking East); Figure 2.8: View of Proposed Center Buildings A and B From Walnut Street (Looking South); Figure 2.9: View of Proposed Walnut, Plaza A, and Plaza B Buildings Along California Street (Looking West); Figure 2.10: View of Proposed Center Building B and Masonic Building from Pine Street (Looking West); Figure 2.11: View of Proposed Masonic Building and Center Building B from Masonic Avenue (Looking Southwest); Figure 2.12: View of Proposed Euclid Building and Euclid Green Along Euclid Avenue (Looking East); and Figure 2.13: View of Proposed Mayfair Building and Laurel Duplexes Along Laurel Street (Looking South). The proposed buildings, including balconies, terraces, skybridges and other features, as well as any rooftop additions or elements that feature unbroken glazed segments 24 square feet or larger would be designed to be compliant with the bird-safe features outlined in Planning Code section 139, as applicable, in order to minimize potential effects of building feature-related hazards on bird safety.

Source: Steelblue (2017)

3333 CALIFORNIA STREET MIXED USE PROJECT

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FIGURE 2.7: VIEW OF PROPOSED PLAZA A, PLAZA B, AND WALNUT BUILDINGS ALONG CALIFORNIA STREET (LOOKING EAST)

Source: Steelblue (2017)

FIGURE 2.8: VIEW OF PROPOSED CENTER BUILDINGS A AND B FROM WALNUT STREET (LOOKING SOUTH)

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Source: Steelblue (2017)

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FIGURE 2.9: VIEW OF PROPOSED WALNUT, PLAZA B, AND PLAZA A BUILDINGS ALONG CALIFORNIA STREET (LOOKING WEST)

Source: Steelblue (2017)

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FIGURE 2.10: VIEW OF PROPOSED CENTER BUILDING B, MASONIC BUILDING, AND WALNUT BUILDING FROM PINE STREET (LOOKING WEST)

Source: Steelblue (2017)

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FIGURE 2.11: VIEW OF PROPOSED MASONIC BUILDING, MASONIC PLAZA, AND CENTER BUILDING B FROM MASONIC AVENUE (LOOKING SOUTHWEST)

FIGURE 2.12: VIEW OF PROPOSED EUCLID BUILDING AND EUCLID GREEN ALONG EUCLID AVENUE (LOOKING EAST)

Source: Steelblue (2017)

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Source: Steelblue (2017)

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FIGURE 2.13: VIEW OF PROPOSED MAYFAIR BUILDING AND LAUREL DUPLEXES ALONG LAUREL STREET (LOOKING SOUTH)

The proposed renovated and new buildings are described below. The descriptions are presented beginning with the renovated buildings at the center of the project site, then the new buildings by street location in a clockwise fashion from California Street.

CENTER OF PROJECT SITE

The existing office building and the three-level, partially below-grade parking garage at the center of the project site would be partially demolished. The remaining portion would be divided into two separate buildings, Center Building A and Center Building B, which would be adapted for residential use and strengthened to accommodate vertical additions (two stories would be added to Center Building A [80 feet tall] and two and three stories to the east and west portions of Center Building B [80 and 92 feet tall, respectively]). These new floor additions would equate to additional height of approximately 24 to 36 feet above the existing building's habitable floors.

Heights are measured from the residential lobbies of Center Building A and Center Building B, adjacent to the proposed Walnut Walk, to the top of the roof. The adaptive reuse strategy for the existing office building would include the following:

- Demolition of the south wing of the existing office building, the northerly extension of the east wing, and the auditorium on the south side of the east wing
- Removal of the existing fourth floor and main entrance on the north elevation, separation of the eastern and western sections of the existing office building into separate buildings with a connecting bridge at Floor 4 that would span the proposed Walnut Walk, and interior demolition to create an interior courtyard in Center Building B
- Reconstruction of the fourth floor and extension to the outer walls of the floor below (the third floor), addition of two new residential floors to the eastern portion of the east section (Center Building B) and the west section (Center Building A), and addition of three new residential floors to the western portion of the west section of Center Building B. All residential floor additions would be set back from the edge of the existing building

The adaptive reuse of the existing office building for residential uses, common areas, and ground floor residential amenity spaces (providing for recreational and social activities and other services for the residents) would require the renovation and/or installation of new building systems to meet current standards in the San Francisco Building and Fire codes and the reconstruction of some existing floors due to seismic and other building code considerations. New foundations would be required around new shear walls for the improved seismic systems.[32] The vertical additions to the newly separated and renovated buildings would be constructed using a metal stud framing system. The existing slightly recessed glass curtain and painted aluminum window wall system (on most sides and along all levels of the newly separated buildings) would be replaced.

[32] Shear walls are solid concrete walls that would extend vertically the height of the structure for the purpose of resisting lateral loads induced by seismic or wind forces.

The proposed façade as well as the vertical additions and connecting bridge at Floor 4 would incorporate glazing and other design features compliant with Planning Code section 139 in order to minimize potential effects of building feature-related hazards on bird safety.

The rooftop spaces on Center Buildings A and B would be designed to accommodate green roof infrastructure, and would also include mechanical rooms for the heating, ventilation, and air conditioning (HVAC) systems and cooling towers. Rooftop space on Center Building B would also be used for solar photovoltaic system infrastructure and/or roof-mounted solar thermal hot water systems. Screening of the mechanical rooms and/or equipment would not exceed the maximum height limit of 16 feet for permitted obstructions (Planning Code section 260(b)).

Center Building A

The adaptively reused Center Building A would be an 89,465-gross-square-foot residential building (including common areas and amenity space for residents) for 51 dwelling units (see Table 2.2, p. 2.23). Residential uses would be provided on renovated Levels 1 through 4 and the two new levels (Levels 5 and 6). Level 1 would have a residential lobby (entrance from the proposed Walnut Walk) and building common areas. Levels 5 and 6 would be set back from the perimeter of the lower floors of Center Building A. The depth of the proposed setbacks would range from approximately 12 to 43 feet with private terraces proposed for the setback areas on Level 5. The overall height of Center Building A would be approximately 80 feet as measured from the main lobby entrance adjacent to the proposed Walnut Walk. (See Figure 2.4, p. 2.20, and Figure 2.14: Proposed Center Building A and Center Building B Sections.)

Center Building B

Center Building B would be a 252,681-gross-square-foot building with 233,423 gross square feet of residential floor area (including common areas and amenity space for residents) for 139 dwelling units and 19,258 gross square feet of space for parking (see Table 2.2, p. 2.23). The building would have residential uses on the east portions of Basement Levels B1 and B2 (which is possible because the site's south-to-north and west-to-east downward-trending slope means that these levels are not completely subsurface at these "basement" levels). Basement Level B2 would include a new residential lobby on Masonic Avenue with pedestrian access via Masonic Plaza. The basement levels would also include building common areas, elevator lobbies, mechanical rooms, and a class 1 bicycle storage room with 190 spaces that would serve Center Buildings A and B. Residential and common area uses would also be provided on Center Building B's renovated Levels 1 through 4, the reconstructed level and three new levels on its central portion (Levels 5 to 7), and the reconstructed level and two new levels on its eastern portion (Levels 5 and 6). Level 1 would have a residential lobby (with an entrance from the proposed Walnut Walk) and building common areas.

Building common areas would also be developed at the center of Levels 1 and 2 and at Level 4. Center Building B would include an interior light court, starting at Level 3 and extending to the top of the building, to provide enhanced daylight for several of the residential units and common corridors. Levels 5 and 6 would be set back from the perimeter of the building's lower floors. The depth of the proposed setbacks on Levels 4 through 6 would range from approximately 12 to 30 feet and private terraces would be developed within these setback areas.

The overall height of Center Building B would be approximately 92 feet as measured from the main lobby entrance adjacent to the proposed Walnut Walk. The east portion of Center Building B would be 80 feet tall. (See Figure 2.4, p. 2.20, and Figure 2.14, p. 2.37.)

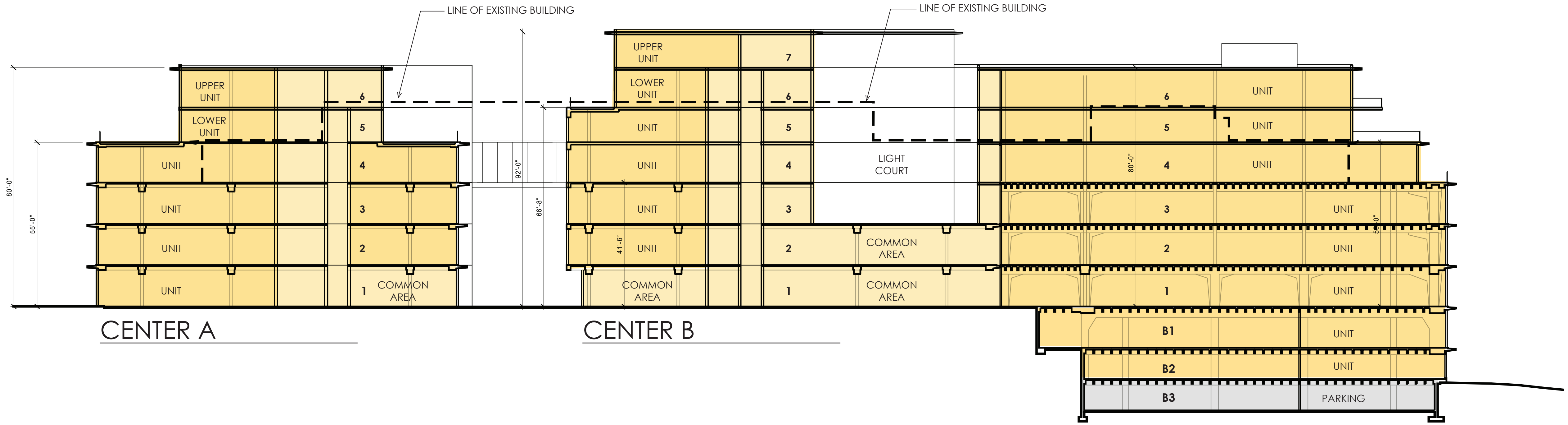
The existing basement levels in Center Building B would be renovated for residential uses, and portions of two levels (Basement Levels B1 and B3) would serve as the Center B Building Garage for residents of Center Buildings A and B. These residents could also park in the proposed California Street and Masonic garages. Access to the Center B Building, California Street, and Masonic garages would be provided from curb cuts and driveways on Presidio Avenue, Walnut Street, and Masonic Avenue. (See "Proposed Parking, Circulation and Loading" on pp. 2.61-2.75 for more detail regarding the parking and circulation program.) In addition to parking, Basement Level 3 would include mechanical rooms to accommodate fire pumps and two new 25,000-gallon water tanks to provide a fire-fighting water supply for Center Building B (required because this building would have an occupied floor above 75 feet).

CALIFORNIA STREET

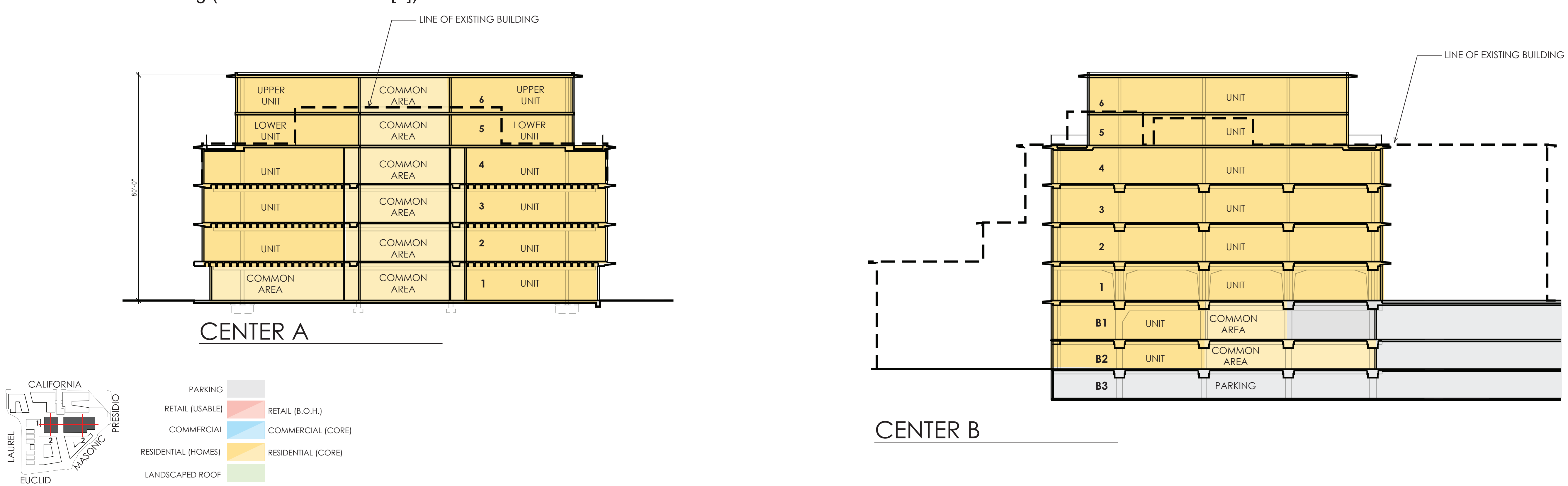
Three new mixed-use buildings – the proposed Plaza A, Plaza B, and Walnut buildings – would be constructed along California Street between Laurel Street and the adjacent lot on the northeast corner of the project site block at California Street and Presidio Avenue (the SF Fire Credit Union) and along a portion of Presidio Avenue to the south of the SF Fire Credit Union. Each of these buildings would be developed with ground-floor retail uses, and would include two or three levels of below-grade parking. The upper floors of the Plaza A and B buildings would be developed for residential uses and the upper floors of the Walnut Building would be developed with office uses. The proposed Mayfair Walk, an east-west pedestrian walkway connecting Laurel Street to Presidio Avenue, would be immediately south of these three buildings, and due to the site's west-to-east downward trending slope, would be above Basement Level B1 of the proposed Walnut Building at Presidio Avenue. The proposed Cypress Square open space would be formed by the inverted L-shaped Plaza B Building and the east side of the Plaza A Building.

The proposed California Street Garage would be developed underneath these proposed buildings and would connect with the Center Building B Garage. The proposed California Street Garage would provide parking for the residential, retail, office, and child care uses proposed for the

Center A and B Building (East/West Section[1])



Center A and B Building (North/South Section [2])



Source: Laurel Heights Partners, LLC (2017)

3333 CALIFORNIA STREET MIXED USE PROJECT

FIGURE 2.14: PROPOSED CENTER BUILDING A AND CENTER BUILDING B SECTIONS

Plaza A, Plaza B, and Walnut buildings; parking for the retail use proposed for the Euclid Building, parking for a portion of the proposed residential uses in Center Buildings A and B, car-share spaces, and commercial parking. (See “Proposed Parking, Circulation, and Loading” on pp. 2.61-2.75.) The basement levels of the proposed California Street Garage would also contain storage and mechanical rooms for building systems such as the non-potable water reuse system. The Plaza A, Plaza B, and Walnut buildings would be concrete below grade through the first level (and second level of the Plaza A Building) with wood frame construction above.

The rooftop spaces on each of these buildings would be designed to accommodate green roof and solar photovoltaic system infrastructure and/or roof-mounted solar thermal hot water systems, mechanical rooms, and elevator penthouses. The Plaza A and Plaza B buildings would also include rooftop decks for use by residents.

Plaza A Building

The Plaza A Building at the corner of Laurel and California streets would be a four-story, 45-foot-tall, 144,878-gross-square-foot building with 66,150 gross square feet of residential floor area (including common areas and amenity space for residents) for 67 dwelling units, 14,178 gross square feet of retail space, and 64,550 gross square feet of space for parking, circulation, and storage and mechanical rooms on two parking levels. (See Table 2.2, p. 2.23.) The proposed building would be approximately 155 feet wide along California Street and approximately 170 feet wide along Laurel Street. It would frame a trapezoidal-shaped interior courtyard and would be set back approximately 18 feet from the north (California Street) property line at Level 1 only. An approximately 3,300-square-foot plaza would be developed within this setback area (California Plaza). The proposed building would be constructed to the west (Laurel Street) property line except at its southwest corner (near Laurel Street and Mayfair Drive) where it would be set back from Laurel Street by approximately 13 feet and from Mayfair Drive by approximately 38 feet. The proposed setback from Mayfair Drive would increase to approximately 48 feet starting at Level 2. The primary residential entrance would be on Laurel Street, with secondary entrances on the proposed Mayfair Walk. Retail spaces would be accessed from California Street. (See Figure 2.15: Proposed Plaza A Building Elevations and Sections.)

Due to the site’s south-to-north and west-to-east downward-trending slope, the Plaza A Building would have a ground floor that would be partially below grade. At the building’s southwest corner near Laurel Street and Mayfair Drive, Basement Level B1 would have a residential lobby, an elevator lobby, parking, and a class 1 bicycle parking storage room (67 spaces) for residents, as well as retail space on Laurel and California streets. The retail space would have a floor-to-floor height of approximately 15 feet. Level 1 would have residential and retail uses, with above-grade residential uses arrayed along the western portion of the proposed building (near Laurel Street) and the interior courtyard, an at-grade lobby/amenity space on the south, and an at-grade retail space fronting the west edge of the proposed Cypress Stairs (a pedestrian pathway from California Street to the proposed Cypress Square).

The Plaza A Building would also have two levels of residential use (Levels 2 and 3). Parking for the residents of the Plaza A Building would be provided in the California Street Garage on Basement Level B1 (under the Plaza A Building) and Basement Level B2 (under the Plaza B Building) and would be accessed from the proposed driveway and garage ramp on Laurel Street. The proposed driveway and garage ramp on Laurel Street would be restricted to right-turn in and right-turn out movements. Parking for retail uses would be provided on Basement Level B2 (under the Plaza A Building) and would be accessed from the proposed driveway and garage ramp on the Walnut Street extension.

Plaza B Building

The Plaza B Building between the proposed Plaza A Building and the Walnut Street extension would be a four-story, 45-foot-tall, 145,618-gross-square-foot building with 72,220 gross square feet of residential floor area (including common areas and amenity space for residents) for 61 dwelling units, 11,328 gross square feet of retail space, and 62,070 gross square feet of space for parking, circulation, and storage and mechanical rooms on two parking levels (see Table 2.2, p. 2.23). The inverted L-shaped building would frame the proposed Cypress Square on two sides and would be constructed to the California Street property line. The proposed building would be approximately 215 feet wide along California Street and approximately 176 feet wide along the Walnut Street extension. The primary residential entrance would be on California Street, with secondary entrances on the Walnut Street extension and the proposed Cypress Square.

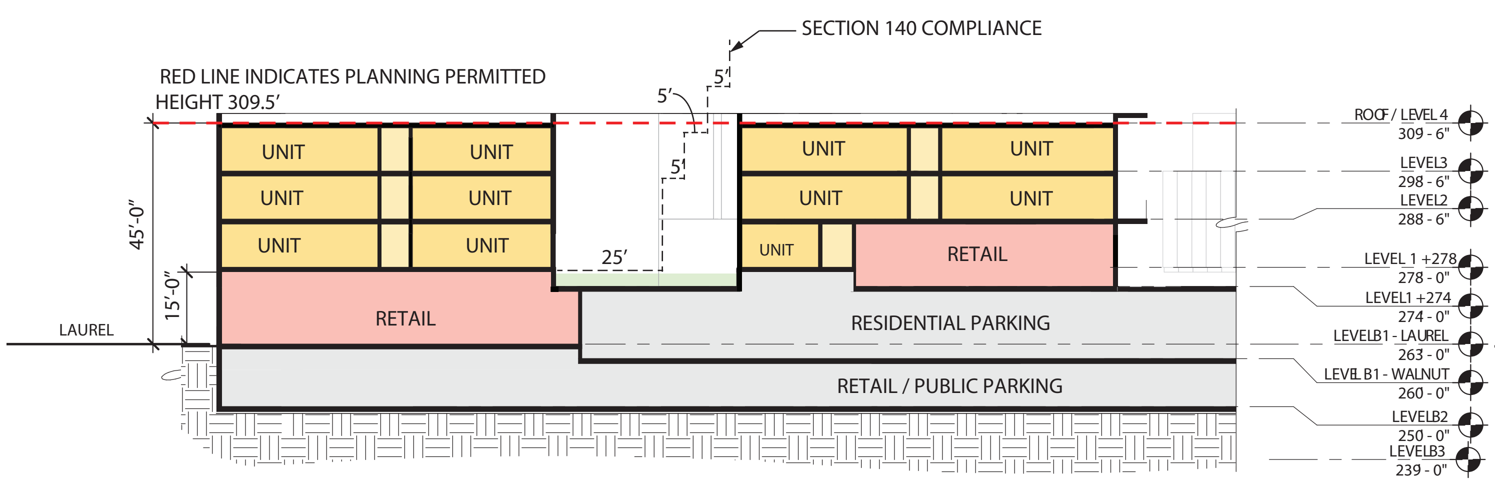
Retail spaces would be accessed from California Street. (See Figure 2.16: Proposed Plaza B Building Elevations and Sections, p. 2.43.) The Plaza B Building would have a partially below-grade basement level due to the site's south-to-north and west-to-east downward-trending slope (toward California Street and Presidio Avenue). Basement Level B1 would have retail space and a residential lobby on California Street, a class 1 bicycle parking storage room (10 spaces) for the retail uses, shower and locker facilities (six lockers) for the retail uses, residential parking for Center Building A and Center Building B, and a ramp from the Walnut Street extension to the retail parking on Basement Level B2 (under the Plaza A Building).

The retail space would have a floor-to-floor height of approximately 15 feet. Level 1 would have residential uses, with above-grade residential uses arrayed along the northern portion of the proposed building (near California Street), an at-grade residential amenity space fronting the north edge of the proposed Cypress Square, and an at-grade residential lobby and class 1 bicycle parking storage room (61 spaces) on the south. The Plaza B Building would also have three levels of residential uses (Levels 2, 3 and 4). Private terraces overlooking the proposed Cypress Stairs

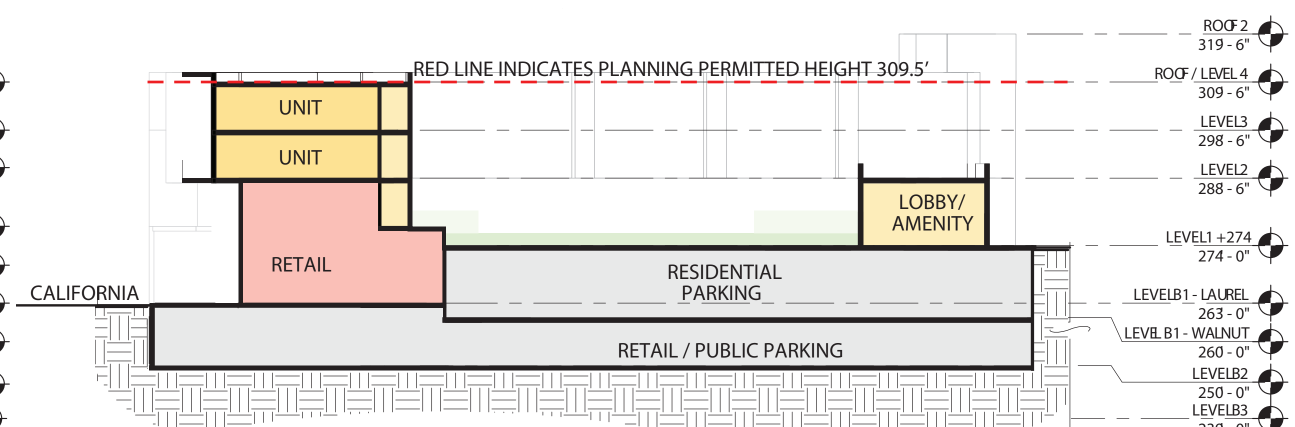
California Street Elevation (North)

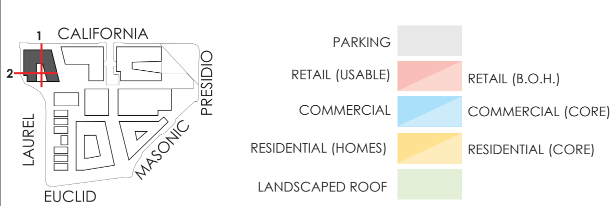
Laurel Street Elevation (West)

Plaza A Building (North/South Section [1])



Plaza A Building (East/West Section [2])





Source: Laurel Heights Partners, LLC (2017)

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FIGURE 2.15: PROPOSED PLAZA A BUILDING ELEVATIONS AND SECTIONS

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Source: Laurel Heights Partners, LLC (2017)

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FIGURE 2.16: PROPOSED PLAZA B BUILDING ELEVATIONS AND SECTIONS

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would be developed for residential units on the west elevation of Level 3 closest to California Street. Parking for residents of the Plaza B Building would be provided in the California Street Garage on Basement Level B2 and would be accessed from the proposed driveway and garage ramp on Laurel Street.

The proposed driveway and garage ramp on Laurel Street would be restricted to right-turn in and right-turn out movements. Parking for the retail uses would be provided on Basement Level B2 under the Plaza A Building and would be accessed from the proposed driveway and garage ramp off the Walnut Street extension.

Walnut Building[33]

The Walnut Building, east of the Walnut Street extension, would be a three-story, 45-foot-tall, 263,453-gross-square-foot mixed-use building with 24,324 gross square feet of retail space, 49,999 gross square feet of office space, 14,690 gross square feet of child care center space, and 174,440 gross square feet of space for parking, circulation, loading, and storage and mechanical rooms on three parking levels (see Table 2.2, p. 2.23). The U-shaped building would frame an interior courtyard on three sides. The proposed Walnut Building would be constructed to the California Street property line except at the northwest corner, where the building would be set back approximately 15 feet from the California Street property line and 70 feet from the Walnut Street sidewalk. The southwest corner of the proposed building would be set back approximately 34 feet from the Walnut Street sidewalk and approximately 70 feet from the proposed Mayfair Walk. The southeast corner of the proposed building would be set back approximately 20 feet from the Presidio Avenue sidewalk with Basement Levels B1 and B2 and topped by the eastern end of Mayfair Walk and the Presidio Overlook. The Walnut Building would be approximately 245 feet wide along California Street, approximately 176 feet wide along the Walnut Street extension, and approximately 70-feet wide along Presidio Avenue. Entrances to the retail, office, and child care center spaces would be from California Street. The portion of the proposed California Street Garage under the Walnut Building would be accessed from the proposed driveway and garage ramp off the Walnut Street extension and from the proposed driveway off Presidio Avenue. (See Figure 2.17: Proposed Walnut Building Elevations and Sections, p. 2.47.)

Due to the south-to-north and west-to-east downward-trending slope, the Walnut Building would have one below-grade and two partially below-grade basement levels. Basement Level B3 would be devoted to below-grade parking for the child care and retail uses and for commercial parking with access from the Presidio Avenue entry driveway and garage ramp and egress from the Masonic Avenue exit-only driveway. An internal garage ramp would provide access to Basement Level B2 and the parking spaces devoted to the office use. The north portion of Basement Level

33 The variant would replace the office use with residential uses, add two new residential floors, reduce the amount of retail space, and increase the number of parking spaces.

B2 (along California Street) would be developed with an at-grade, centrally located retail space and an elevator lobby for the proposed child care center space. These spaces would have a floor-to-floor height of approximately 15 feet. Basement Level B2 would also include a below-grade mechanical room at the proposed building's northwest corner, a class 1 bicycle parking storage room for the child care use (10 spaces) at the northeast corner, parking for the office uses, and space for circulation with ramp access to Basement Level B3 and the Presidio Avenue entry driveway and Masonic Avenue exit-only driveway. At-grade retail and office space elevator lobbies fronting California Street would be developed on the northwest portion of Basement Level B1, and an L-shaped child care center would be developed on its east portion, facing California Street and Presidio Avenue, with access to a triangular-shaped outdoor terrace overlooking the adjacent SF Fire Credit Union.[34]

The remainder of Basement Level B1 would be devoted to parking for residents of Center Building A and Center Building B, two separate class 1 bicycle parking storage rooms for the office (10 spaces) and retail (4 spaces) uses, and space for circulation with access from the proposed driveway and garage ramp off the Walnut Street extension. Level 1 would have retail uses along the west and south portions of the floor and office uses on the north portion. This level would include an interior courtyard that would overlook the triangular-shaped outdoor terrace for the proposed child care center. The top level would be devoted exclusively to office uses and would be accessed via the office space elevator lobby fronting California Street.

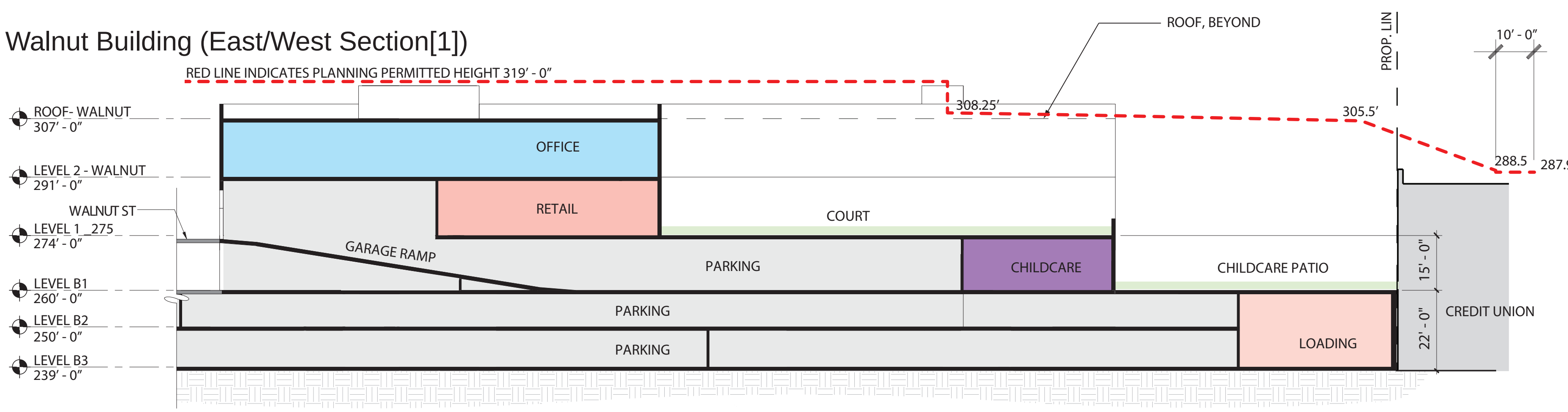
In addition, an off-street freight loading dock with access from the driveway and garage ramp off Presidio Avenue would be developed at Basement Level B3. As described below on pp. 2.77-2.78 under "Proposed Freight and Passenger Loading Program," the freight loading dock with three off-street spaces, one proposed 100-foot-long commercial truck (yellow) loading zone on California Street, and three proposed 60-foot-long passenger (white) loading zones on Masonic Avenue, Euclid Avenue, and Laurel Street, south of Mayfair Drive would serve the proposed residential, office, child care, and retail uses in Center Building A and Center Building B, and the Plaza A, Plaza B, and Walnut buildings. Each of the proposed new and renovated buildings would be connected to the off-street freight loading dock via service corridor(s). The residential move-in/move-out loading activities for the Plaza A and B buildings would take place near the off-street freight loading area or from curb space along Laurel Street or California Street (with a special time-limited permit from the San Francisco Municipal Transportation Agency [SFMTA] for use of on-street spaces).

[34] Child care drop-off and pick-up operations would be expected to occur at Basement Level B3 where the required parking spaces for the proposed child care use would be located adjacent to the elevator lobby for the proposed child care center space.

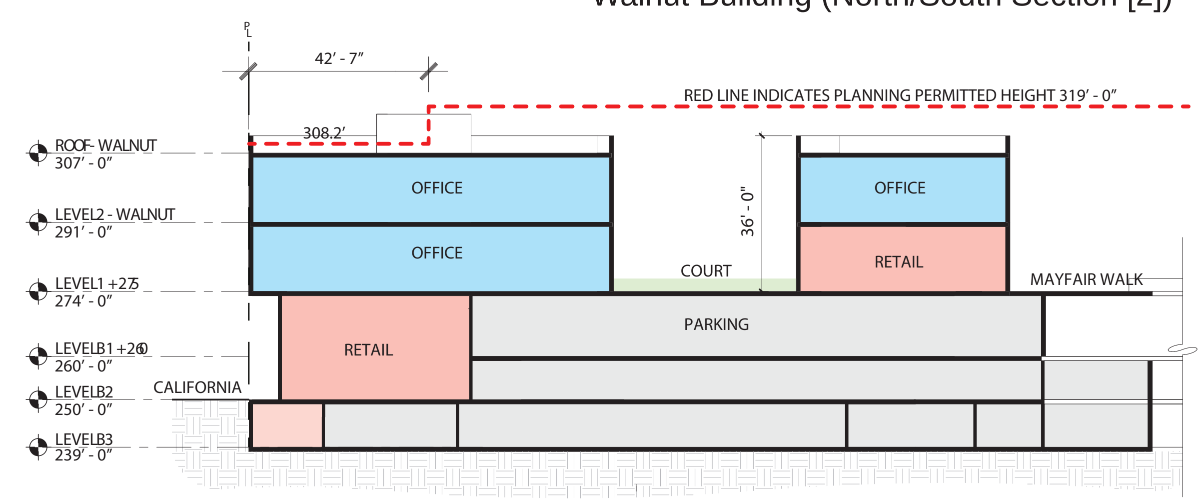
California Street Elevation (North)

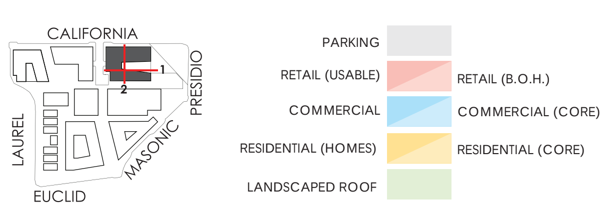
Presidio Avenue Elevation (East)

Walnut Building (East/West Section[1])



Walnut Building (North/South Section [2])





Source: Laurel Heights Partners, LLC (2017)

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FIGURE 2.17: PROPOSED WALNUT BUILDING ELEVATIONS AND SECTIONS

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PRESIDIO AVENUE/MASONIC AVENUE

Masonic Building

The triangular-shaped Masonic Building would be bounded by the proposed Walnut Walk on the west, the private terraces and landscaped area between the building and Center Building B on the north, and Masonic Avenue on the southeast. It would be a four- to six-story, 40-foot-tall, 124,892-gross-square-foot building with 88,906 gross square feet of residential floor area (including residential amenity space) for 61 dwelling units and 35,986 gross square feet of space for parking, circulation, and storage and mechanical rooms on a single parking level (see Table 2.2, p. 2.23). The Masonic Building would be approximately 238 feet wide along Masonic Avenue, approximately 177 feet wide along the proposed Walnut Walk, and approximately 210 feet wide along the area with private terraces and landscaping between the Masonic Building and Center Building B. The proposed building would be set back approximately 10 feet from the southeast (Masonic Avenue) property line. The proposed Masonic Plaza would be developed in the space between Center Building B and the Masonic Building. The residential entrances would be on Masonic Avenue and on the proposed Walnut Walk. (See Figure 2.18: Proposed Masonic Building Elevations and Sections.)

Due to the site's southwest-to-northeast downward-trending slope, the Masonic Building's first level (Basement Level B1) would be a partially below-grade parking garage (the Masonic Garage), with a residential lobby at the northeast corner of the floor adjacent to the proposed garage entry and driveway. The footprint for the proposed Masonic Garage would extend under the proposed Walnut Walk and Euclid Building. Basement Level B1 would be accessed from the proposed driveway off Masonic Avenue adjacent to the residential lobby at the northeast corner of the proposed building (see Figure 2.18). In addition to the residential lobby, Basement Level B1 would provide space for parking and circulation; an off-street freight loading area; a refuse staging area; a stormwater storage cistern; and storage, trash collection, and mechanical rooms including a mechanical room at its northeastern corner to accommodate a new 800-kilowatt/1,000-kilovolt-ampere emergency diesel generator with a 500-gallon fuel storage tank. At Level 1 the proposed residential uses would be located along Masonic Avenue on each side of the proposed garage entry and driveway and on the north portion of the floor facing Center Building B. The residential uses along Masonic Avenue and southwest of the proposed garage entry and driveway would have separate entrances via stoops, while those along the north portion would have separate private terraces (facing the landscaped area between Center Building B and the Masonic Building). Two separate residential common areas and a class 1 bicycle parking storage room (61 spaces) for residents would be provided at the center of this floor, and a residential common area at the northwest corner.

Level 2 would have residential uses along Masonic Avenue and in the northwest portion (with proposed at-grade private terraces fronting Walnut Walk) and the north portions of the floor. An at-grade residential lobby, with access from the proposed Walnut Walk, and a residential common area would be provided on the southwest portion of the floor. Two separate residential common areas and an internal courtyard would be provided at the center of this floor. Level 3 would have residential uses along each edge of the proposed building and a residential common area at the center of this floor. The top three floors (Level 4 – Level 6) would also have residential uses, with each floor successively set back from Masonic Avenue. Rooftop spaces would be designed to accommodate green roof infrastructure and would also include shared and private decks as well as mechanical rooms. A portion of the parking for the residential uses would be provided in mechanical stackers on the single-level parking garage (the Masonic Garage) accessed from Masonic Avenue. The mechanical stacker system would be a multicar, independently accessed system that residents would use to retrieve and return their own vehicles (i.e., they would be able to operate the system without assistance from a valet). The Masonic Building would be concrete below grade through the first level with wood frame construction above.

EUCLID AVENUE

Euclid Building

The Euclid Building would be a roughly square building surrounding an internal courtyard. The proposed building would be bounded by the private terraces and landscaped area between it and Center Building A on the north, the proposed Walnut Walk on the east, Euclid Avenue on the south, and the proposed private terraces on the west between it and the Laurel Duplexes. The Euclid Building would be a four- to six-story, 40-foot-tall, 233,623-gross-square-foot building with 177,345 gross square feet of residential floor area (including common areas) for 135 dwelling units, 4,287 gross square feet of retail space, and 51,991 gross square feet of space for parking and circulation in the single-level parking garage (the Masonic Garage) accessed from Masonic Avenue (see Table 2.2, p. 2.23). The proposed building would be 220 feet wide along Euclid Avenue, approximately 254 feet wide along the proposed Walnut Walk, approximately 158 feet wide along the landscaped area between it and Center Building A, and approximately 210 feet wide along the area with private terraces and landscaping between it and the Laurel Duplexes. The proposed building would be set back approximately 67 feet from the south (Euclid Avenue) property line. The proposed Euclid Green would be developed within this setback and would extend west to Laurel Street. The eastern portion of this space would be private open space (Euclid Terrace) associated with the Euclid Building amenity spaces. (See Figure 2.19: Proposed Euclid Building Elevations and Sections.)

Source: Laurel Heights Partners, LLC (2017)

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FIGURE 2.18: PROPOSED MASONIC BUILDING ELEVATIONS AND SECTIONS

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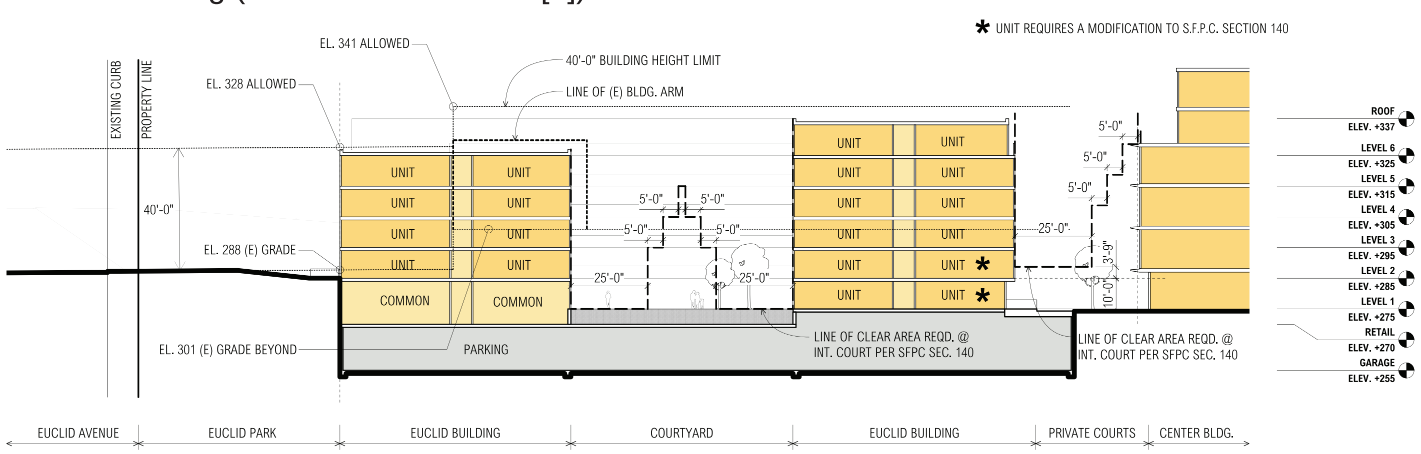
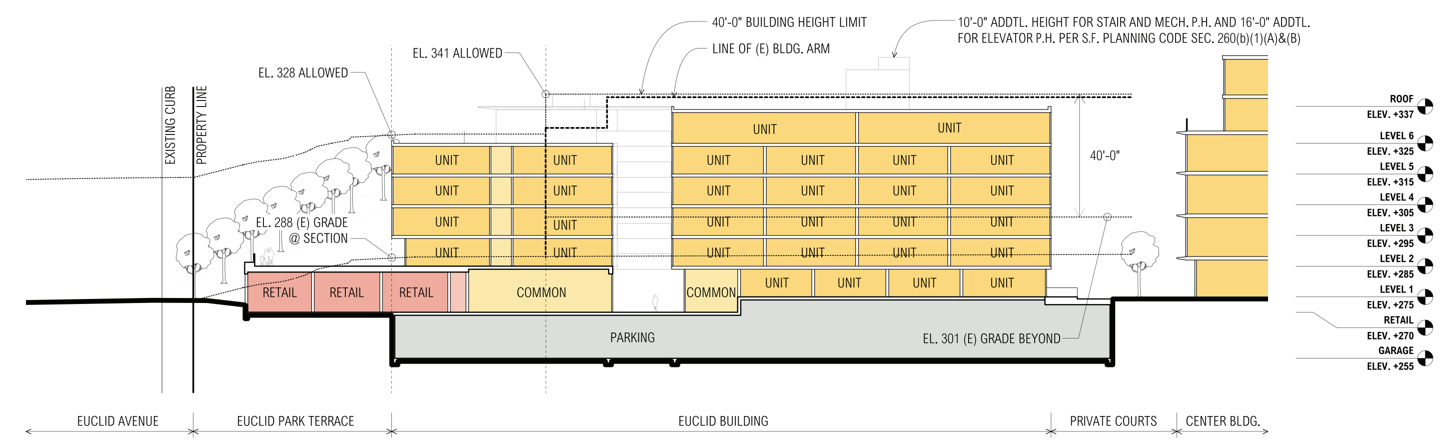
Euclid Street Elevation (South)

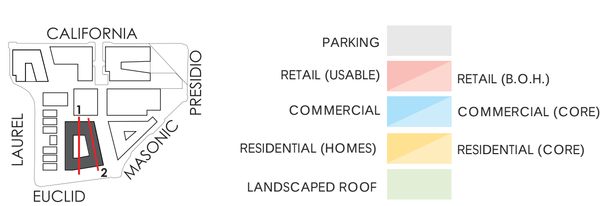
Walnut Walk Elevation (East)

Euclid Building (North/South Section [1])



Euclid Building (Northwest/Southeast Section [2])





Source: Laurel Heights Partners, LLC (2017)

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FIGURE 2.19: PROPOSED EUCLID BUILDING ELEVATIONS AND SECTIONS

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Due to the site's southwest-to-northeast downward-trending slope, the Euclid Building would have a partially below-grade floor. Level 1 would have at-grade residential uses arrayed around the internal courtyard along the north side, the northern portion of the east side, and the west side. The building would have separate at-grade entrances to the residential lobby, a residential common area, and an amenity space near the proposed Walnut Walk at the center of the east side. Separate partially below-grade common area spaces and a class 1 bicycle parking storage room (135 spaces) would be developed along the south (Euclid Avenue) side of this floor. Also on Level 1 there would be small retail spaces with separate at-grade entrances facing the south terminus of the proposed Walnut Walk, topped by the proposed Euclid Terrace.

The retail spaces would have a floor-to-floor height of approximately 15 feet. Level 2 would have residential uses arrayed around the internal courtyard. The residential common areas and lobby along the south portion of the floor would be connected to the residential common areas, lobby, and interior courtyard below. The next three floors (Level 3 – Level 5) would have residential uses along each side, surrounding the internal courtyard. The top floor (Level 6) would also have residential uses but only along the north, east, and west sides. At Level 6, the proposed building would be set back from the lower floors along its south elevation (Euclid Avenue). Rooftop spaces would be designed to accommodate infrastructure for a green roof and solar photovoltaic system and/or roof-mounted solar thermal hot water systems, and would also include shared decks as well as mechanical rooms, within the allowable height limit of the planning code.

The Euclid Building's proposed below-grade basement level would be part of the proposed Masonic Garage and would be accessed from Masonic Avenue. The basement level would include parking and circulation space, trash rooms, internal stairs, and elevator cores. A portion of the parking would be provided in multicar mechanical stackers. Residents would be able to retrieve and return their own vehicles (i.e., they would be able to operate the mechanical stacker system without assistance from a valet). The Euclid Building would be concrete below grade through the first level with wood frame construction above.

LAUREL STREET

Laurel Duplexes

Seven detached duplexes would be developed along Laurel Street between Euclid Avenue and the proposed Mayfair Building. Construction of the seven duplexes would result in the development of 58,839 gross square feet of total floor area with 54,111 gross square feet of residential floor area and 4,728 gross square feet of parking and storage space. (See Table 2.2, p. 2.23.) Each duplex would include four floors, would range in height from 37 to 40 feet, and would have a centralized building core for the elevators and stairs. Six of the seven duplexes would be set back 25 feet from Laurel Street. The fourth duplex in the row would be set back 60 feet from Laurel

Street to retain two existing Coast Live Oak trees. (See Figure 2.20: Proposed Laurel Duplex Elevations and Typical Section.)

Due to the site's south-to-north and west-to-east downward-trending slope, each duplex would include a full basement on the east portion of the floor and an independently accessible parking garage on its west portion (two garages per duplex with one parking space per unit). The exception would be the duplex behind the existing Coast Live Oak trees, which would not have a basement or a parking garage. The two parking spaces for this duplex would be provided in the proposed Masonic Garage. The proposed parking garages for the six duplexes would be accessed via six separate 10-foot-wide curb cuts and would be partially below-grade. Residential uses would be developed on the east portion of the first floor and on each successive floor. Six of the seven duplexes would include private balconies on Level 4 along the east and west sides, and all would have rooftop decks and mechanical rooms. All rooftops (except for the centrally located duplex) would be designed to accommodate solar photovoltaic system infrastructure and/or roof-mounted solar thermal hot water systems. The Laurel Duplexes would be wood-framed construction, excluding concrete foundations and retaining walls as necessary.

Mayfair Building

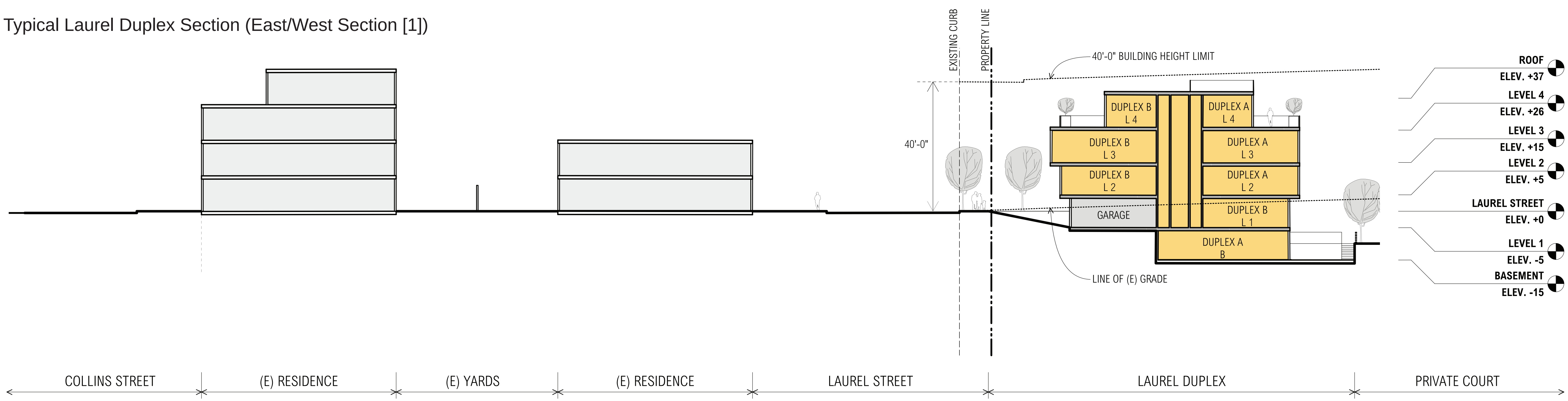
The rectangular Mayfair Building would be bounded by the proposed Mayfair Walk on the north, the proposed landscaped area to the east between it and Center Building A, the proposed Laurel Duplexes on the south, and Laurel Street on the west. The Mayfair Building would be a four-story, 40-foot-tall, 58,821-gross-square-foot building with 43,071 gross square feet of residential floor area (including common areas) for 30 dwelling units, and 15,750 gross square feet of space for parking, circulation, and storage and mechanical rooms on a single parking level (see Table 2.2, p. 2.23).

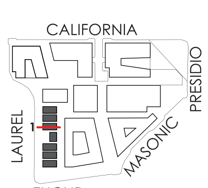
The proposed building would be approximately 138 feet wide along the proposed Mayfair Walk, approximately 77 feet wide along the proposed landscape area between the Mayfair Building and Center Building A, approximately 138 feet wide along the proposed Laurel Duplexes, and approximately 77 feet wide along the west (Laurel Street) property line. The proposed building would be set back approximately 6 to 23 feet (average 15 feet) from the west (Laurel Street) property line. (See Figure 2.21: Proposed Mayfair Building Elevations and Sections.)

Due to the site's south-to-north and west-to-east downward-trending slope, the Mayfair Building would have a below-grade parking level with access from Laurel Street. The basement level would provide space for residential parking (most of which would have mechanical lifts), circulation (including connections to the proposed California Street and Masonic garages), a mechanical room, and a class 1 bicycle parking storage room (30 spaces). Residents would be able to retrieve and return their own vehicles from the mechanical stacker (i.e., they would be

Laurel Street Elevation (West)

Typical Laurel Duplex Section (East/West Section [1])





PARKING
RETAIL (USABLE) RETAIL (B.O.H.)
COMMERCIAL COMMERCIAL (CORE)
RESIDENTIAL (HOMES) RESIDENTIAL (CORE)
LANDSCAPED ROOF

Source: Laurel Heights Partners, LLC (2017)

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FIGURE 2.20: PROPOSED LAUREL DUPLEXES ELEVATION AND TYPICAL SECTION

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Source: Laurel Heights Partners, LLC (2017)

3333 CALIFORNIA STREET MIXED USE PROJECT

FIGURE 2.21: PROPOSED MAYFAIR BUILDING ELEVATIONS AND SECTION

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able to operate the mechanical stacker system without assistance from a valet). The ground floor would be developed with a residential lobby (at the northwest corner) with stepped access from the proposed Mayfair Walk. The ground floor would also include residential uses with private terraces along the north and south sides. The top three floors would be developed with residential uses, with private balconies at the top floor along the west side. The rooftop space would be designed to accommodate green roof and solar photovoltaic system infrastructure and/or roof-mounted solar thermal hot water systems, and would also include a shared deck and a mechanical room. The Mayfair Building would be concrete below grade through the first level with wood frame construction above.

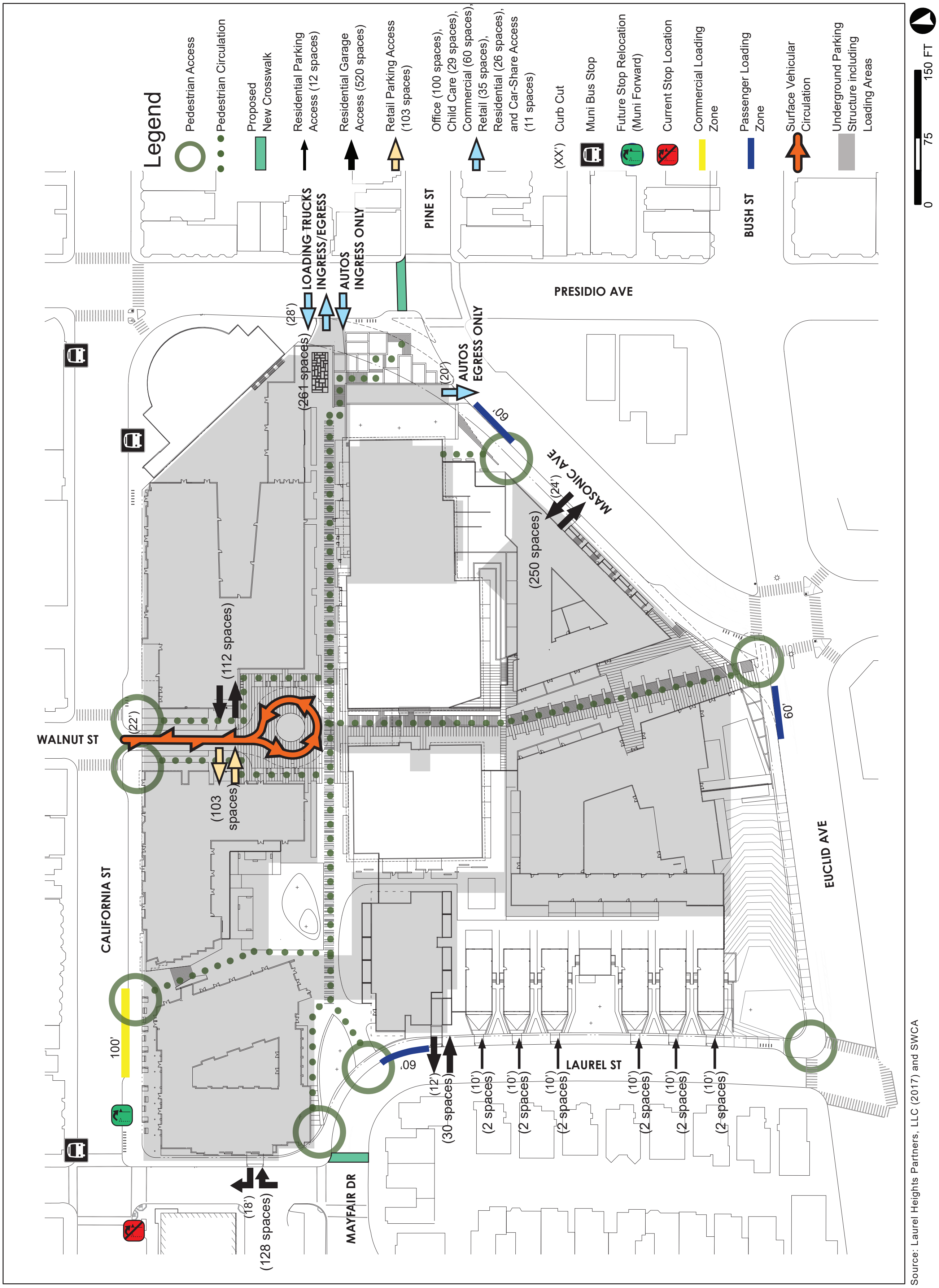
PROPOSED PARKING, CIRCULATION, AND LOADING

PROPOSED PARKING AND CIRCULATION

Off-Street Parking

The proposed project would provide four below-grade parking garages: the California Street Garage, which would be constructed under the Plaza A, Plaza B, and Walnut buildings; the Center Building B Garage, which would encompass the two renovated below-grade parking levels under Center Building B (Basement Levels B1 and B3); the Masonic Garage, which would be developed under the Masonic and Euclid buildings; and the Mayfair Garage, which would be developed under the Mayfair Building. (See Figure 2.22: Proposed Site Access, Figure 2.23: Proposed California Street Garage and Center Building B Garage - Basement Level B1, Figure 2.24: Proposed California Street Garage - Basement Level B2, Figure 2.25: Proposed California Street Garage and Center Building B Garage - Basement Level B3, Figure 2.26: Proposed Masonic Garage, and Figure 2.27: Proposed Mayfair Garage.) Six individual below-grade, independently accessible, two-car parking garages would also be provided for six of the seven Laurel Duplexes. The ten garages would total 428,773 gross square feet.

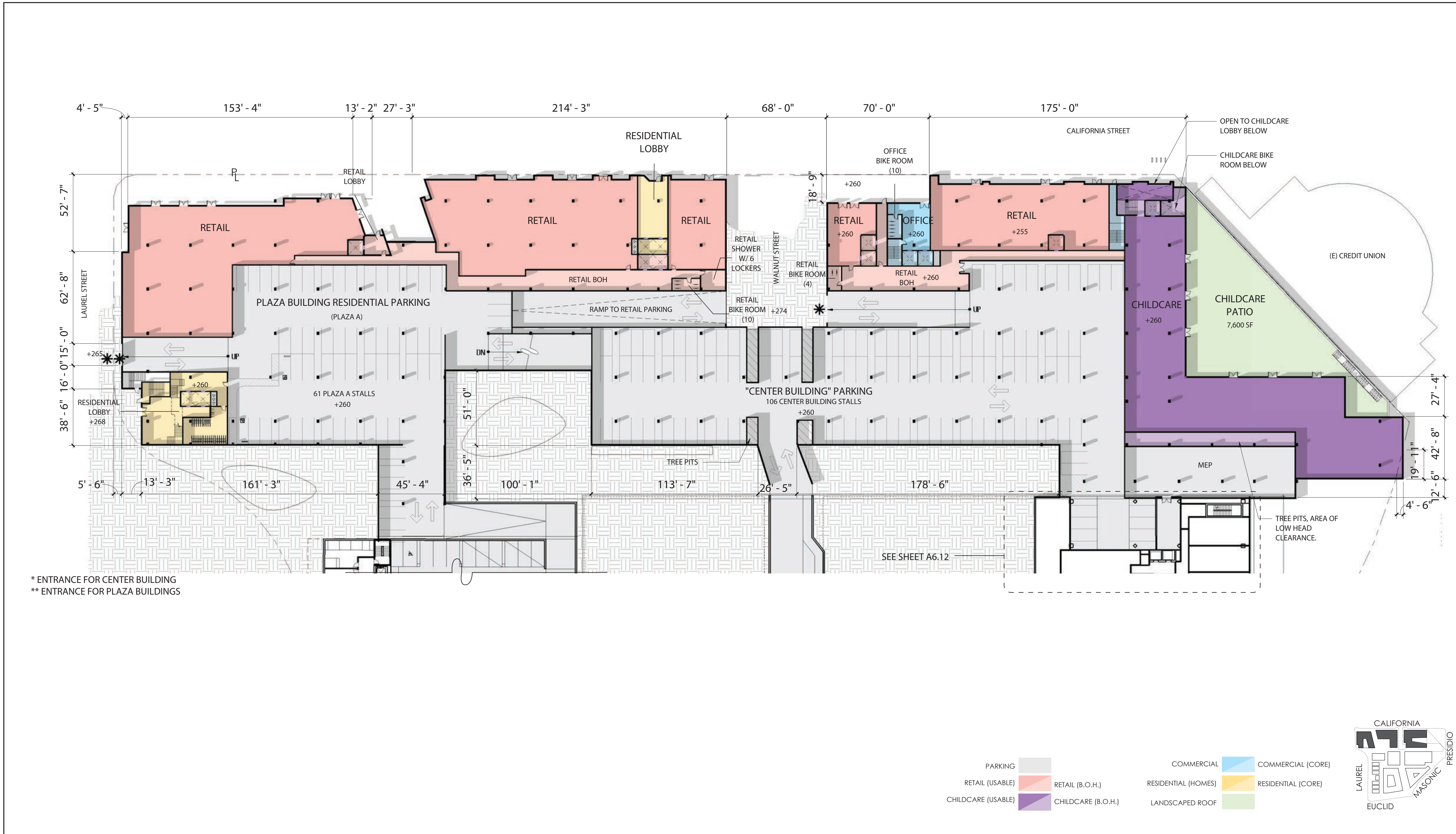
The proposed parking program would replace and expand the existing 543 surface and subsurface parking spaces on the project site. Overall there would be a total of 896 off-street parking spaces: 558 spaces for residential uses, 138 spaces for retail uses, 100 spaces for office uses, 29 spaces for the child care use, 60 commercial parking spaces, and 11 car-share spaces. (See Table 2.3: Parking Summary.)



3333 California Street Mixed-Use Project

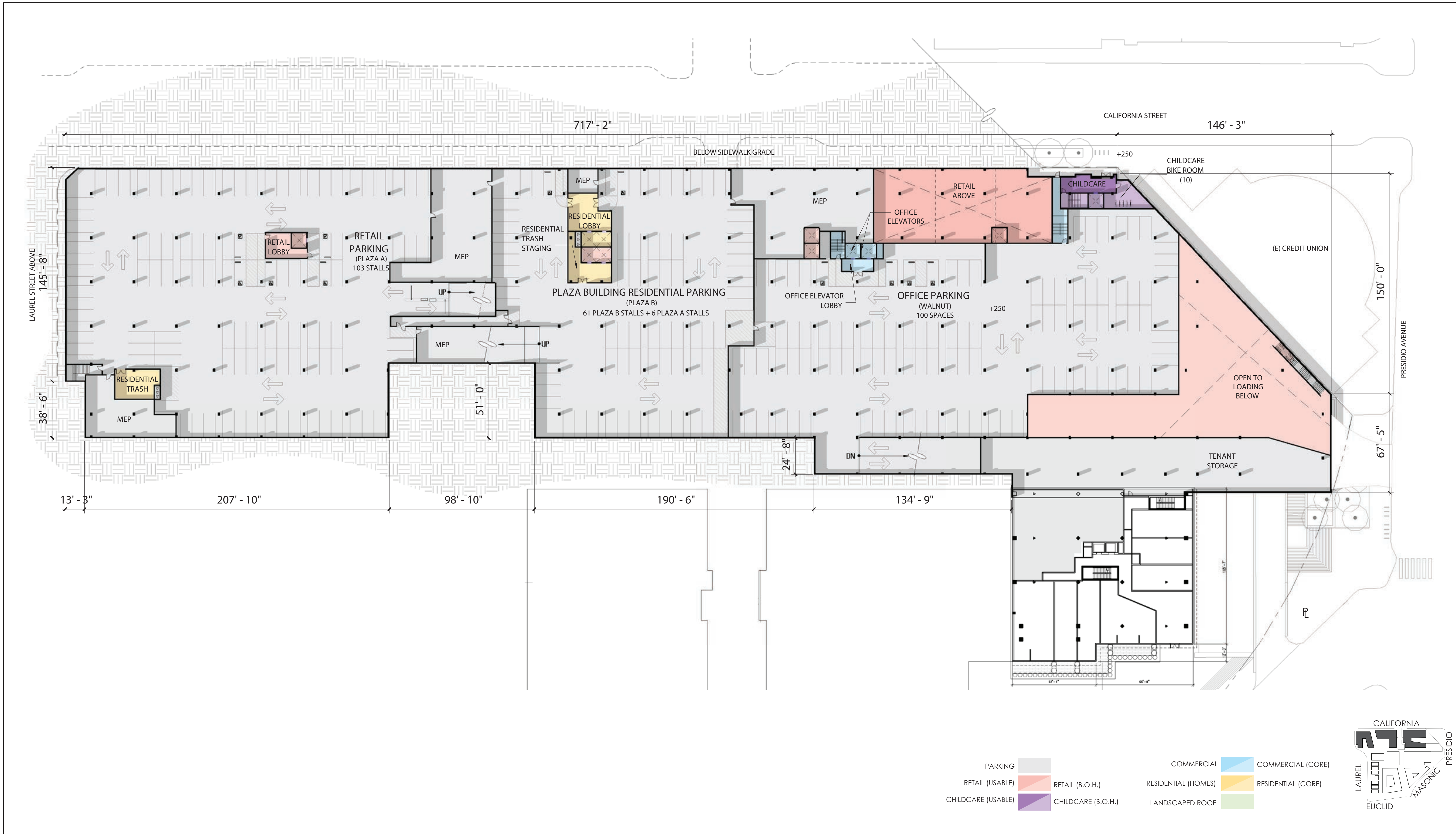
2015-014028ENV

FIGURE 2.22: PROPOSED SITE ACCESS



Source: Laurel Heights Partners, LLC (2017)

FIGURE 2.23: PROPOSED CALIFORNIA STREET GARAGE AND CENTER BUILDING B GARAGE - BASEMENT LEVEL B1



Source: Laurel Heights Partners, LLC (2017)

3333 CALIFORNIA STREET MIXED USE PROJECT

FIGURE 2.24: PROPOSED CALIFORNIA STREET GARAGE - BASEMENT LEVEL B2

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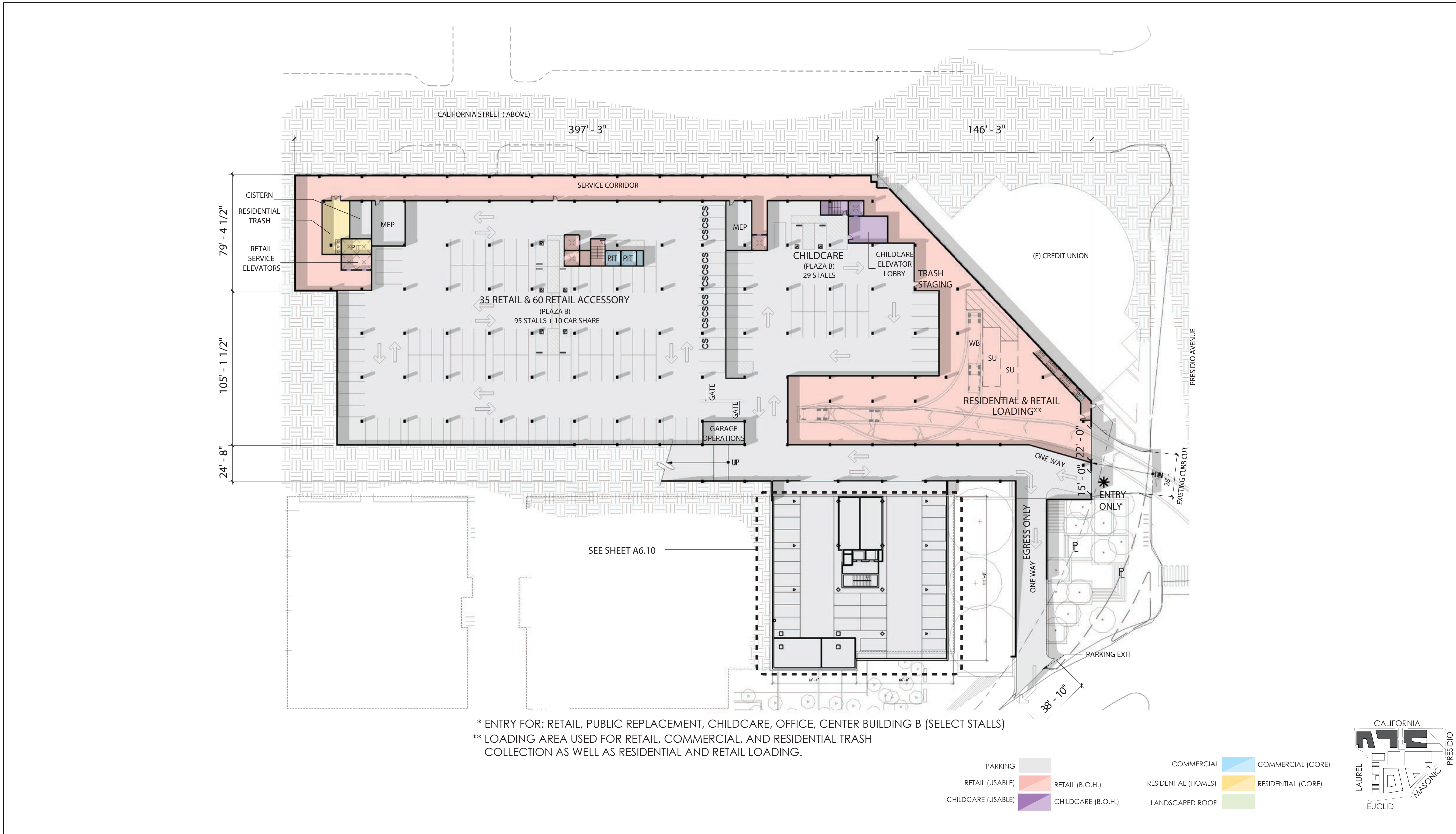

Source: Laurel Heights Partners, LLC (2017)

3333 CALIFORNIA STREET MIXED USE PROJECT

FIGURE 2.25: PROPOSED CALIFORNIA STREET GARAGE AND CENTER BUILDING B GARAGE - BASEMENT LEVEL B3

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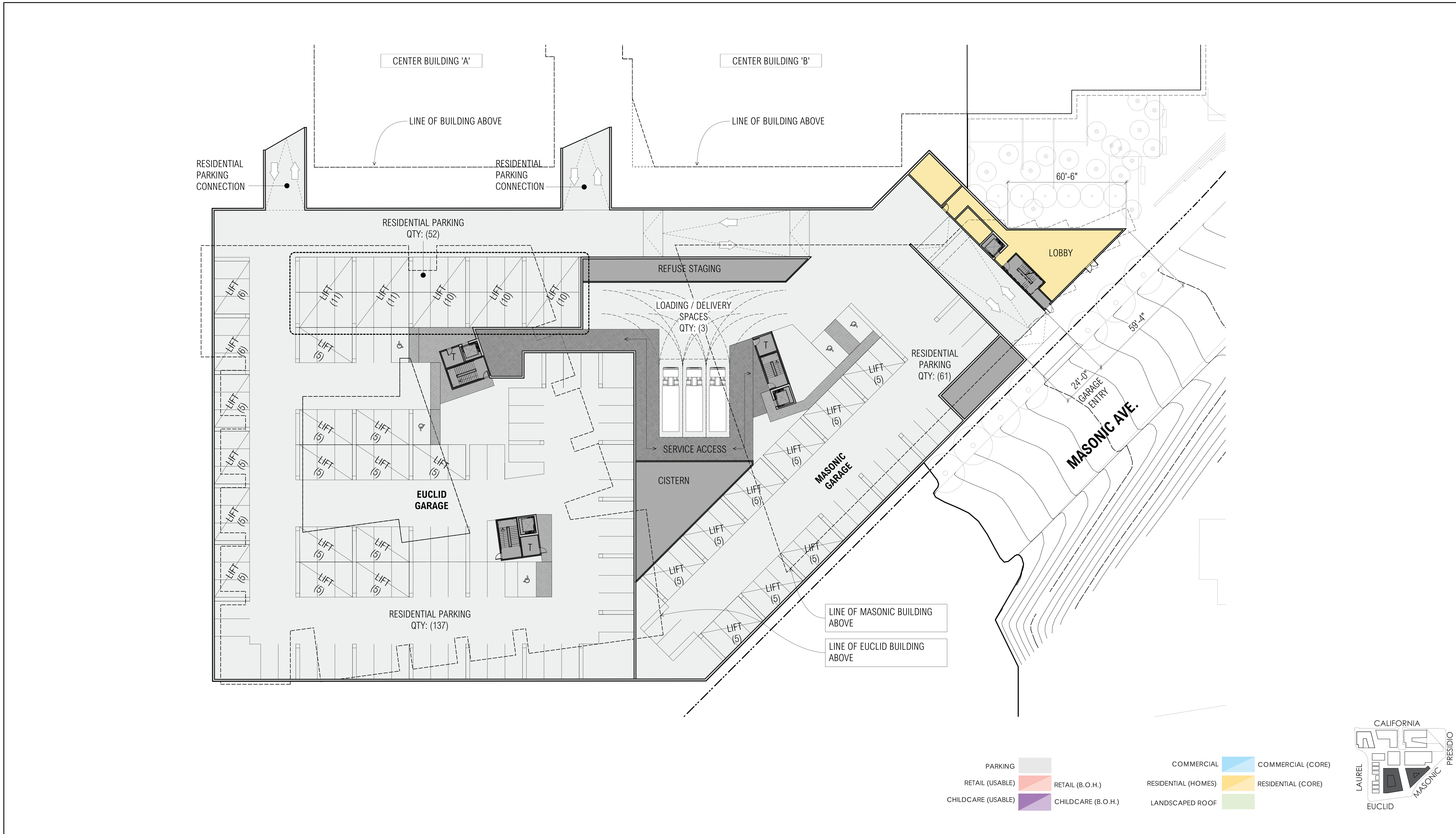

Source: Laurel Heights Partners, LLC (2017)

3333 CALIFORNIA STREET MIXED USE PROJECT

FIGURE 2.26: PROPOSED MASONIC GARAGE

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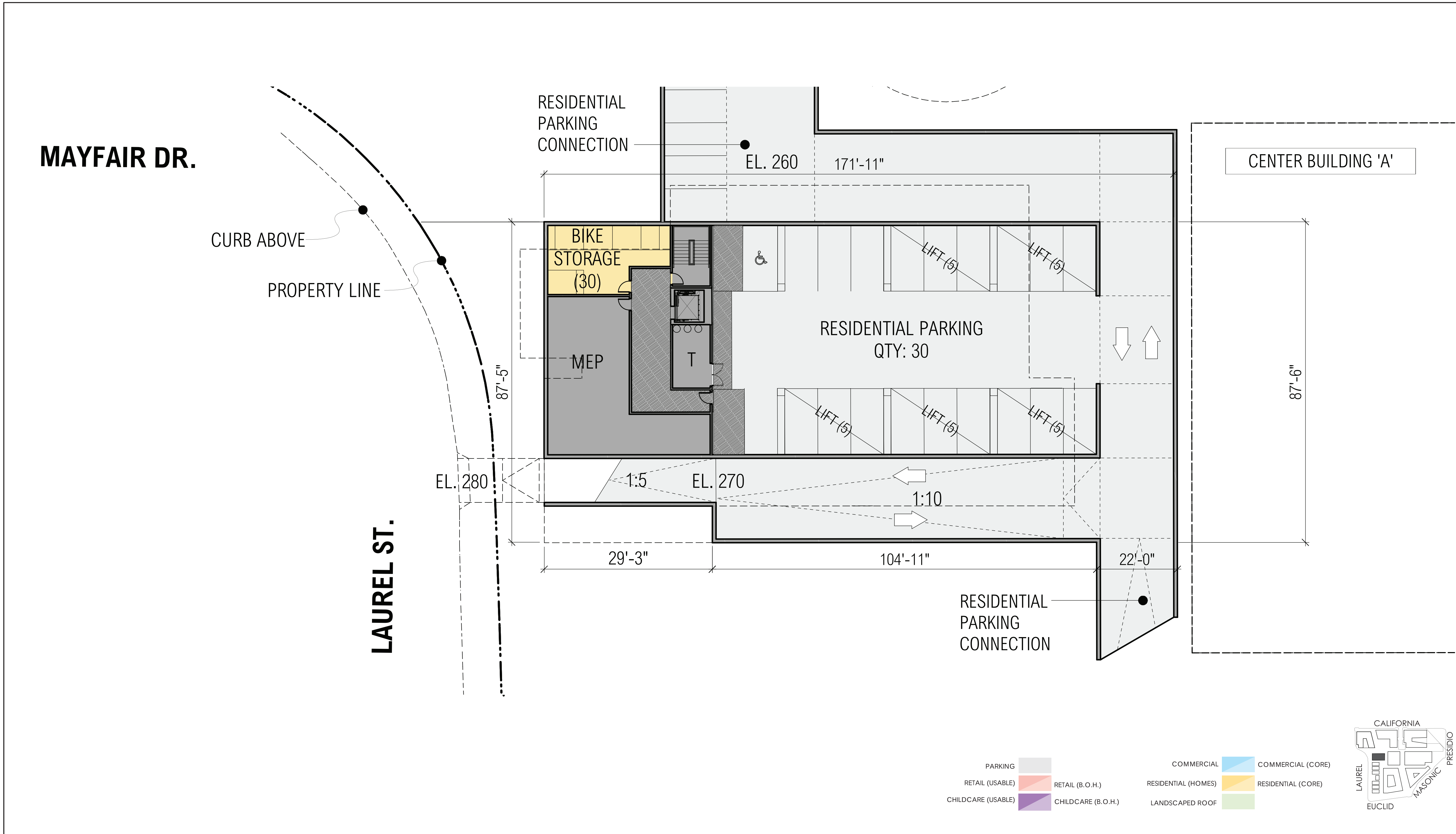


Source: Laurel Heights Partners, LLC (2017)

3333 CALIFORNIA STREET MIXED USE PROJECT

FIGURE 2.27: PROPOSED MAYFAIR GARAGE

Table 2.3: Parking Summary

Proposed Garage	Primary Entrances	No. of Parking Spaces	Assigned Use
California Street Garage *(Under Plaza A, Plaza B, and Walnut buildings)*	Laurel Street	128	Residential uses in Plaza A and Plaza B buildings
	Walnut Street	103	Retail uses in Plaza A, Plaza B, Walnut, and Euclid buildings
		106	Residential uses in Center Buildings A and B
	Presidio Avenue	100	Office use in Walnut Building
		35	Retail use in Walnut Building
		29	Child care use in Walnut Building
		11	Car-share space for members
		60	Commercial spaces for public
Center B Building Garage *(Renovated Parking Levels)*			
Basement Level B1	Walnut Street	6	Residential uses in Center Buildings A and B
Basement Level B3	Presidio Avenue	26	Residential uses in Center Buildings A and B
Masonic Garage *(Under Masonic and Euclid buildings)*	Masonic Avenue	52	Residential uses in Center Buildings A and B
		61	Residential uses in Masonic Building
		135	Residential uses in Euclid Building
		2	Residential use for one Laurel Duplex
Mayfair Garage *(Under Mayfair Building)*	Mayfair Drive	30	Residential uses in Mayfair Building
Laurel Garages *(Under 6 of 7 Laurel Duplexes)*	Laurel Street	12	Residential use in six Laurel Duplexes
Total No. of Parking Spaces		**896**	**558 for residential uses** **138 for retail uses** **100 for office use** **29 for child care use** **60 commercial spaces** **11 car-share spaces**

Source: Laurel Heights Partners, LLC; BAR Architects; Solomon Cordwell Buenz; and Jensen Architects (August 2017)

As shown in Table 2.3, residential parking would be located in the California Street Garage (234 spaces), the Masonic Garage (250 spaces), and the Mayfair Garage (30 spaces) as well as in the private garages for the Laurel Duplexes (12 spaces) and the Center Building B Garage (32 spaces). The number of parking spaces in the California Street and Masonic garages includes 106 and 52 spaces, respectively, for residents of Center Building A and Center Building B.

The number of parking spaces in the Masonic Garage would also include two spaces for one of the seven Laurel Duplexes. Retail parking would be located in the proposed California Street Garage (138 spaces), and parking for the office use (100 spaces) and child care use (29 spaces), as well as the 60 commercial parking spaces, would be located in the portion of the California

Street Garage under the Walnut Building. All 11 car-share spaces would be located in Basement Level B3 of the California Street Garage and would be accessed from the Walnut Building's retail elevator lobby entrance off California Street.

Vehicles would enter and exit the proposed parking garages from the following access points:

- An entry/exit driveway from California Street into the project site with separate entry/exit driveway driveways off each side of the Walnut Street extension into the California Street Garage (residential and retail uses).
- A shared driveway off Presidio Avenue. The driveway would have one entry/exit to the off-street freight loading dock in the California Street Garage. Another separate entry (ingress only) would lead to the office, child care, retail, car-share, and commercial parking spaces on Basement Levels B3 and B2 of the California Street Garage and to the residential parking in Basement Level B3 of the Center Building B Garage (residential, office, child care, retail, car-share, and commercial uses).
- An exit-only driveway onto Masonic Avenue near the intersection with Pine Street for the California Street and renovated Center B Building garages (residential, retail, office, child care, car-share, and commercial uses).
- An entry/exit driveway off Masonic Avenue for the Masonic Garage (residential uses only).
- Six individual driveways along Laurel Street for six of the Laurel Duplexes (residential uses only).
- An entry/exit driveway onto Laurel Street south of Mayfair Drive for the Mayfair Garage(residential uses only).
- A right-turn in entry/right-turn out exit driveway onto Laurel Street between California Street and Mayfair Drive for the California Street Garage (residential uses only).

The renovated below-grade parking levels under Center Building B would connect to Basement Levels B1 and B3 of the California Street Garage via the access driveway from Presidio Avenue and an internal garage ramp. Each of the proposed driveways to the California Street, Masonic, and Mayfair garages (along Laurel Street, the Walnut Street extension, Presidio Avenue, and Masonic Avenue) would be access-controlled with gates or doors, and would include audible warnings and signage to minimize pedestrian conflicts.

Circulation changes would include the introduction, elimination, or relocation of existing curb cuts on Presidio, Masonic, and Euclid avenues; on Laurel Street; and on Mayfair Drive as follows:

- The existing 28-foot-wide curb cut at the California Street entrance would be reduced to 22 feet with the development of curb bulb-outs at the extension of Walnut Street into the project site, which would terminate with a roundabout. The Walnut Street extension would provide access to two of the California Street Garage entrances.
- The existing 28-foot-wide curb cut on Presidio Avenue would remain, but would be adjusted slightly to follow the proposed modification to the alignment of the west curb on

Presidio Avenue, to be parallel to the existing east curb. The driveway would provide in and out access for the off-street freight loading area and separate in-only access to the California Street Garage for office, retail, child care, and residential parking uses as well as commercial parking.

- A new 20-foot-wide curb cut would be provided for vehicles exiting to Masonic Avenue from the California Street Garage and Basement Level B3 of Center Building B.
- A new 24-foot-wide curb cut on Masonic Avenue would provide in and out access to the proposed Masonic Garage.
- The existing 27-foot-wide curb cut on Laurel Street (between Mayfair Drive and Euclid Avenue) would be removed.
- The Laurel Duplexes would have independent access to their respective garages (12 independent parking spaces in total) via six separate 10-foot-wide curb cuts along Laurel Street, south of Mayfair Drive.
- The existing 22-foot-wide curb cut on Mayfair Drive would be relocated to the south and modified to be a 12-foot-wide driveway to provide in and out access to the proposed Mayfair Building's below-grade parking garage.
- A new 18-foot-wide curb cut on Laurel Street would provide right-turn in access to and right-turn out egress from the proposed California Street Garage.

Emergency vehicles would continue to have access to the perimeter of the project site to provide emergency services such as fire protection for the proposed new buildings along California Street, Presidio Avenue, Masonic Avenue, Euclid Avenue, and Laurel Street. They would be able to access the center of the site via the Walnut Street extension, the west end of the proposed Mayfair Walk, and the south end of the proposed Walnut Walk at the intersection of Masonic and Euclid avenues.

On-Street Parking

There are approximately 102 on-street vehicle parking spaces (including two car-share spaces on Euclid Avenue) and no loading spaces along the curbs adjacent to the site. The proposed project would reduce the number of on-street vehicle parking spaces to approximately 66 through the elimination of spaces for new curb cuts, the conversion of existing spaces to four new commercial and passenger loading zones, sidewalk widening, and other streetscape changes. One new parking space would be created as a result of the streetscape changes at the Presidio Avenue/Masonic Avenue/Pine Street intersection. Overall, there would be a net reduction of 36 on-street parking spaces.

PROPOSED BICYCLE PARKING

The proposed project would provide 592 class 1 bicycle parking spaces as follows: 558 spaces for residential uses, 10 spaces for office uses, 14 spaces for retail uses, and 10 spaces for the child care use. Each proposed multifamily residential and mixed-use building would include a class 1 bicycle parking storage room at street level or at Basement Levels B1 or B2 to accommodate the required class 1 bicycle parking spaces.

The proposed project would also provide 101 class 2 bicycle parking spaces as follows: 56 spaces for residential uses, 2 spaces for office uses, 33 spaces for retail uses, and 10 spaces for the child care use.[35] The proposed class 2 bicycle parking spaces would be located along the edges of the project site at pedestrian access points and near building entrances, and adjacent to the Walnut Building near the roundabout terminating the extension of Walnut Street into the project site, as follows:

- 48 spaces on the south side of California Street near Laurel Street (16), near Walnut Street (16), and near the eastern edge of the property (16)
- 14 spaces on the west side of Presidio Avenue at the Masonic Avenue/Pine Street intersection (near the proposed Pine Street Steps and Plaza)
- 14 spaces on the west side of Masonic Avenue at the Masonic Avenue/Euclid Avenue intersection (near the proposed Corner Plaza)
- 10 spaces on the north side of Euclid Avenue at the Euclid Avenue/Laurel Street intersection (near the proposed Euclid Green)
- 15 spaces at the center of the site adjacent to the Walnut Building near the roundabout at the end of the Walnut Street extension

PROPOSED PEDESTRIAN CIRCULATION

The project site would be integrated with the existing street grid. Pedestrian promenades would be developed to align with Walnut Street and connect to Masonic and Euclid avenues (north/south direction), and to align with Mayfair Drive and connect to Presidio and Masonic avenues and Pine Street (east/west direction) (see Figure 2.22, p. 62). The north-south running Walnut Walk and the east-west running Mayfair Walk would be closed to vehicular traffic. The northern portion of Walnut Walk would be the extension of Walnut Street into the project site, which would provide vehicular access to the California Street Garage and terminate at a roundabout. Pedestrians would be able to walk through the project site from Laurel, California, and Walnut streets to Presidio Avenue, Masonic Avenue, Pine Street, and Euclid Avenue. In addition, a pedestrian walkway between the Plaza A and Plaza B buildings (Cypress Stairs) would provide access from the California Street sidewalk (at the midblock between Laurel and Walnut streets) to Cypress Square, one of the proposed onsite plazas that would be open to the public. Pedestrian access would also be provided at Walnut Street, at Presidio Avenue near the corner of Pine Street at the eastern terminus of Mayfair Walk (the proposed Pine Street Steps and Plaza), at the intersection of Masonic and Euclid Avenues at the southern terminus of Walnut Walk (the proposed Corner Plaza), and at the western terminus of Mayfair Walk. In addition,

[35] Each bicycle rack would accommodate two bicycles.

access to the proposed Euclid Green would be developed at the corner of Laurel Street and Euclid Avenue. These spaces would be designed to be compliant with the Americans with Disabilities Act.

PROPOSED FREIGHT AND PASSENGER LOADING PROGRAM

The proposed project would provide six off-street commercial and residential freight loading spaces, with three located in the off-street freight loading area in the proposed California Street Garage, accessed from Presidio Avenue, and three located in the off-street freight loading area in the proposed Masonic Garage under the Masonic and Euclid buildings. The proposed off-street loading area in the California Street Garage would accommodate 40-foot-long Recology garbage trucks, 30-foot-long single-unit trucks, and 55-foot-long intermediate semitrailer trucks. The proposed off-street loading area in the Masonic Garage would accommodate 40-foot-long Recology garbage trucks and 30-foot-long single unit trucks. Vertical clearance for the proposed California Street and Masonic Garage entrances from Presidio Avenue and Masonic Avenue would be 15 feet. Residential move-in and move-out loading activities for the new and renovated buildings (except the Laurel Duplexes) would occur within these off-street freight loading areas in the proposed California Street and Masonic garages or from existing on-street spaces along California Street, Presidio Avenue, Masonic Avenue, Euclid Avenue, or Laurel Street (with a special time-limited permit from the SFMTA for use of existing on-street parking spaces). Residential move-in and move-out loading activities for the Laurel Duplexes would occur along Laurel Street (with a special time-limited permit from the SFMTA for use of on-street parking spaces) and/or from private parking garages, as described below. Commercial freight loading activities would occur at the off-street freight loading dock accessed from Presidio Avenue and would serve all future retail and office tenants via service corridors, elevators, and internal stairs.

In addition to these six proposed off-street freight loading spaces, the project sponsor would request from the SFMTA the conversion of 15 on-street parking spaces to create one 100-foot-long commercial loading zone and three separate 60-foot-long passenger loading zones at the following locations:

- South side of California Street near Laurel Street (commercial)
- West side of Masonic Avenue near Presidio Avenue and Pine Street (passenger)
- North side of Euclid Avenue near Masonic Avenue (passenger)
- East side of Laurel Street near Mayfair Drive (passenger)

Passenger loading would also occur at the proposed roundabout at the terminus of the Walnut Street extension into the project site. This proposed circulation feature would allow residents and guests to be picked up or dropped off at the center of the site. In addition, child care center pick-up/drop-off activities would occur at Basement Level B3 of the California Street Garage at a location adjacent to the elevator lobby for the proposed child care center space.

Trash Collection

Centralized trash rooms with combined chutes or bins for recyclable, compostable and trash would be located within each residential building on every floor. The combined chutes would terminate into separate recyclable, compostable, and trash bins using tri-waste sorters and would be held within trash collection rooms. If separated into bins at each floor by occupants or tenants the bins would be collected and transported via elevator to the trash collection rooms in the basement levels of each building. The solid waste bins would be transported via an electric tow tractor system to the off-street refuse staging areas adjacent to the off-street freight loading docks in the California Street and Masonic garages and compacted for offsite transport. Self-contained compactors for landfill materials, mixed recyclables, and compost would be located in both refuse staging areas with container capacity ranging from 15 to 25 cubic yards. Commercial solid waste management activities for the retail and office uses would be accommodated in the basement-level trash collection rooms with internal connections via service corridors, elevators, and internal stairs to the off-street refuse staging area in the California Street Garage. Solid waste would be picked up by Recology on a regularly scheduled service program (approximately six trips per week – three each at the proposed off-street freight loading areas within the proposed California Street and Masonic garages). Solid waste for the Laurel Duplexes and Mayfair Building would be collected from Laurel Street on a weekly basis, typically every Tuesday.

TRANSPORTATION DEMAND MANAGEMENT PLAN

San Francisco Planning Code section 169 identifies the applicability of the Transportation Demand Management (TDM) Program and establishes the TDM Program Standards for new development. New development projects are required to choose from a menu of options to develop a TDM Plan, subject to certain modifications that may be made for large projects (such as the proposed project) subject to a development agreement.[36] The project sponsor submitted a Transportation Demand Management (TDM) Plan Application to the planning department in August 2017 and has agreed to implement selected TDM measures to reduce per capita automobile use. The proposed project's TDM plan will require monitoring and reporting to the planning department to demonstrate compliance throughout the lifetime of the project. Selected TDM measures are summarized below:

- **Improve Walking Conditions (TDM Measure Active-1A):** Streetscape improvements proposed along California Street, Presidio Avenue, Masonic Avenue, Euclid Avenue and

[36] The project sponsor of a development project subject to the requirements of planning code section 169 must designate a TDM coordinator. The TDM coordinator may be an employee for the development project (e.g., property manager) or the project sponsor may contract with a third-party provider(s) (e.g., transportation brokerage services as required for certain projects pursuant to planning code section 163). The TDM coordinator shall be delegated authority to coordinate and implement the TDM Plan.

Laurel Street would be consistent with the Better Streets Plan. The proposed Mayfair and Walnut walks would integrate the 10-acre site with the existing pedestrian network.

- **Bicycle Parking (TDM Measure Active-2):** Bicycle parking would be provided for residential, office, and retail uses. For residential uses, the required class 1 space for each dwelling unit and two class 2 spaces for every 20 units would be provided. The number of spaces provided for office, child care, and retail uses would comply with the planning code.
- **Showers and Lockers (TDM Measure Active-3):** At least one shower and at least six clothes lockers would be provided for every 30 class 1 bicycle parking spaces. The number of showers and clothes lockers would meet planning code requirements.
- **Bicycle Repair Station (TDM Measure Active-5):** A bicycle repair station, with tools and supplies such as a bicycle pump and wrenches, would be located on the project site.
- **Car-Share Parking (TDM Measure Cshare-1):** Ten car-share spaces would be provided in Basement Level B3 of the California Street Garage in accordance with the planning code.
- **Delivery Supportive Amenities (TDM Measure Delivery-1):** An area for the receipt and temporary storage of package deliveries would be provided in the off-street loading areas or other location on the project site.
- **Onsite Childcare (TDM Measure Family-2):** An onsite childcare facility would be provided in the Walnut Building.
- **Multimodal Wayfinding Signage (TDM Measure Info-1):** Multimodal wayfinding signage that directs tenants, residents, visitors, and employees to nearby transportation services would be provided. Signage would comply with city standards.
- **Real Time Information Displays (TDM Measure Info-2):** Real time information displays (showing information about transit lines, walk time to transit locations, or the location of onsite car-share vehicles, for example) would be provided in prominent locations on the project site.
- **Tailored Transportation Marketing (TDM Measure Info-3):** Individualized, tailored marketing and communication campaigns regarding sustainable transportation modes would be implemented. A TDM coordinator would manage these marketing services, which would include promotions and welcome packets with information about transportation options. Personal consultations would be offered to new residents and retail employees along with a request for a commitment to try sustainable transportation options.
- **Unbundle Parking (TDM Measure Pkg-1):** All accessory parking for the proposed project would be leased or sold separately from the rental or purchase fees.

The project's proposed TDM Plan may be refined during the planning review process for project entitlements.

PROPOSED STREETSCAPE CHANGES

PRESIDIO AVENUE

The proposed project would include an encroachment at the eastern property boundary along Presidio Avenue, immediately north of the intersection with Pine Street and Masonic Avenue, to accommodate streetscape improvements. The proposed project would reconfigure the curb line in this area to regularize the property's frontage on Presidio Avenue. These proposed modifications to the eastern edge of the property would be combined with the removal of the triangular-shaped pedestrian island and the right-most travel lane for southbound traffic on Presidio Avenue merging onto Masonic Avenue, the construction of a corner bulb-out on the west side of the Masonic Avenue/Presidio Avenue/Pine Street intersection, the installation of a continental crosswalk crossing Presidio Avenue (to Pine Street), and the widening of the Presidio Avenue sidewalk (from 10 to 15 feet). These streetscape changes would result in an approximately 2,170-square-foot space that would be integrated with the proposed Pine Street Steps and Plaza. (See Figure 2.28a: Existing Streetscape and Proposed Streetscape Changes – Presidio Avenue.)

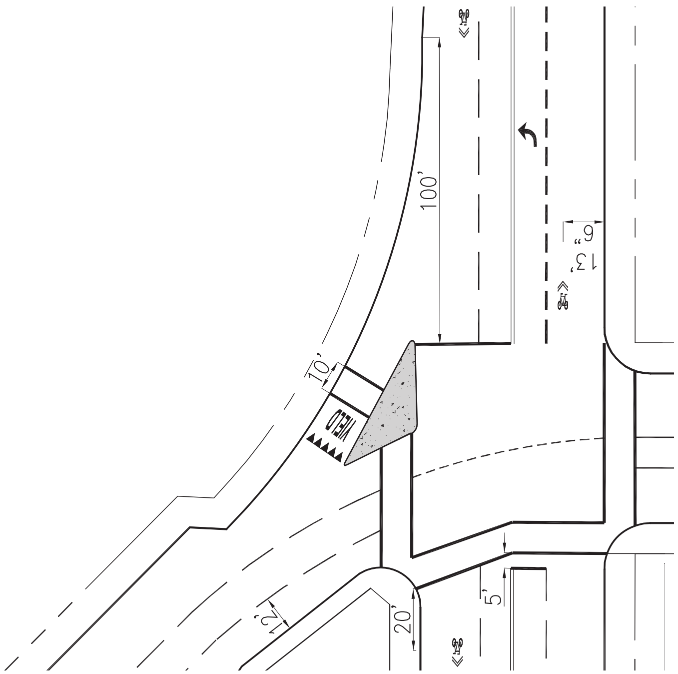
MASONIC AVENUE AND EUCLID AVENUE

The proposed project would also reconfigure the west curb line on Masonic Avenue at its intersection with Euclid Avenue (see Figure 2.28b: Existing Streetscape and Proposed Streetscape Changes – Masonic Avenue). The proposed project would remove the triangular-shaped pedestrian island and right-most travel lane for southbound traffic on Masonic Avenue merging onto Euclid Avenue to regularize the intersection of Masonic and Euclid avenues by eliminating the slip lane. The existing triangular-shaped pedestrian island would be incorporated into an approximately 4,000-square-foot open space (the proposed Corner Plaza) that would be integrated with the southern end of the proposed Walnut Walk. This open space would be activated by the proposed retail use in the adjacent Euclid Building, and the residential lobby and amenity spaces in the adjacent Masonic and Euclid buildings.

LAUREL STREET AND MAYFAIR DRIVE

The proposed project would add a corner bulb-out at the northeast corner of Laurel Street/Mayfair Drive and an eastside crosswalk at the three-way intersection (crossing Mayfair Drive). The redesigned intersection would be an approximately 650-square-foot space that would highlight the primary east-west pedestrian access to the site, the proposed Mayfair Walk.

MASONIC AND PRESIDIO AVENUE (EXISTING)



MASONIC AND PRESIDIO AVENUE (PROPOSED)

Source: Laurel Heights Partners, LLC (2017) and SWCA

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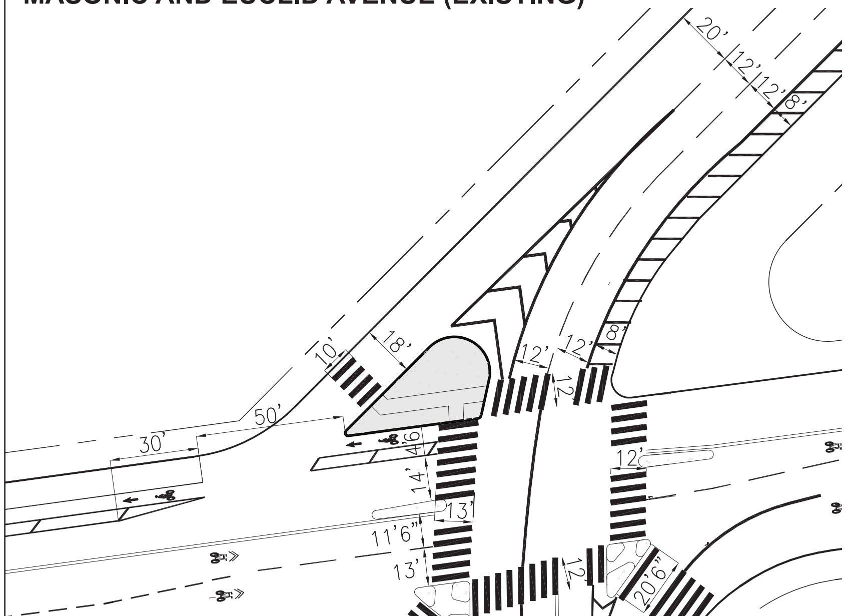
2015-014028ENV

FIGURE 2.28A: EXISTING STREETSCAPE AND PROPOSED STREETSCAPE CHANGES - PRESIDIO AVENUE

MASONIC AND EUCLID AVENUE (EXISTING)



MASONIC AND EUCLID AVENUE (PROPOSED)

Source: Laurel Heights Partners, LLC (2017) and SWCA

3333 CALIFORNIA STREET MIXED-USE PROJECT

2015-014028ENV

FIGURE 2.28B: EXISTING STREETSCAPE AND PROPOSED STREETSCAPE CHANGES - MASONIC AVENUE

OTHER IMPROVEMENTS

Streetscape changes would also include proposed sidewalk widening along Masonic Avenue (from 10 to 15 feet), along Euclid Avenue (from 10.5 to 12 feet), and along Laurel Street (from 10 to 12 feet); and proposed corner bulb-outs at the southwest corner of the California Street/Laurel Street intersection, at the southwest and southeast corners of the California Street/Walnut Street intersection, and at the northeast corner of the Laurel Street/Euclid Avenue intersection.

PROPOSED OPEN SPACE AND LANDSCAPING

OPEN SPACE

The proposed project would retain approximately 53 percent of the overall lot area (approximately 236,000 square feet, excluding green roofs) as open area with portions to be developed with a combination of common open space (some of which would be open to the public) and private open space (see Table 2.4: Proposed Open Space and Figure 2.29: Proposed Open Space, p. 2.85). The proposed project would include new landscaped open space throughout the project site as follows:

- California Plaza (approximately 3,300 square feet) within the setback of the proposed Plaza A Building along California Street, extending east from the Laurel Street/California Street intersection to the proposed Cypress Stairs
- Cypress Square (between the Plaza A and B buildings) and the western portion of the proposed east-west Mayfair Walk (approximately 28,150 square feet), accessed from the Cypress Stairs between the Plaza A and B buildings, Mayfair Walk, and Walnut Walk; the Cypress Square residential open space would be an approximately 1,570-square-foot private open space adjacent to Cypress Square and would serve the Plaza B Building
- Presidio Overlook (approximately 3,800 square feet) at the eastern terminus of Mayfair Walk, accessed from Mayfair Walk or the Pine Street Steps and Plaza
- Masonic Plaza (approximately 3,000 square feet), between Center Building B and the Masonic Building along Masonic Avenue
- Walnut Walk (north-south) to Masonic and Euclid avenues at Corner Plaza (approximately 16,760 square feet, excluding the Walnut Street Extension, roundabout and walkway between Center Building A and Center Building B)

Table 2.4: Proposed Open Space

Open Space	Approximate Size (Square Feet)	Location
Common Open Space NOTE A		
California Plaza	3,300	Within the setback of the proposed Plaza A Building along California Street, extending east from the Laurel Street/California Street intersection to the proposed Cypress Stairs
Cypress Square and western Mayfair Walk	28,150	Between the Plaza A and B buildings and the portion of the east-west walkway between the Plaza B Building and Laurel Street
Walnut Walk	16,760	The portion of the north-south walkway between Center Buildings A and B to Masonic and Euclid avenues at Corner Plaza
Euclid Green	18,760	Extending from the intersection of Euclid Avenue and Laurel Street at the southwest corner of the site toward the corner of Masonic and Euclid avenues
Presidio Overlook	3,800	At the eastern terminus of Mayfair Walk, accessed from Mayfair Walk or the Pine Street Steps and Plaza
Cypress Stairs	32,230	Between the Plaza A and B buildings
Walnut Extension and Roundabout		Between Plaza B and Walnut buildings
Eastern Mayfair Walk		Between Center Building B and the Walnut Building east of Walnut Extension and Roundabout
Pine Street Steps and Plaza		On east side of Walnut Building and Center Building B near intersection of Masonic and Presidio avenues
Masonic Plaza		Between Center Building B and the Masonic Building along Masonic Avenue
Subtotal	*103,000*	
Private Open Space NOTE B		
Ground-level terraces, interior courtyards and private internal walkways	85,000	Throughout the project site including the Cypress Square residential open space and the Euclid Residential Terrace

Notes:

[A] A portion of the common open space would be open to the public.

[B] The private open space does not include rooftop decks.

Source: Laurel Heights Partners, LLC, 2017

Source: Laurel Heights Partners, LLC (2017)

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2015-014028ENV

FIGURE 2.29: PROPOSED OPEN SPACE

- Euclid Green (approximately 18,760 square feet), extending from the intersection of Euclid Avenue and Laurel Street at the southwest corner of the site toward the corner of Masonic and Euclid avenues, and
- Other open spaces including, but not limited to, the Cypress Stairs, the eastern portion of the proposed east-west Mayfair Walk, and the Pine Street Steps and Plaza

None of the open spaces would include event programming or amplified sounds.

Overall, the proposed project would provide approximately 103,000 square feet of common useable open area that meets the Planning Code section 135 definition of open space. Portions of the open spaces described and illustrated above would be accessible to the public. There would also be approximately 85,000 square feet of private open space that does not include rooftop decks, but does include ground-level terraces, interior courtyards and private internal walkways. For example, the Euclid Residential Terrace would be an approximately 5,950-square-foot private open space adjacent to the proposed Euclid Green and would serve the Euclid Building residents.

In addition, the proposed improvements at the Presidio Avenue/Pine Street/Masonic Avenue intersection (the proposed Pine Street Steps and Plaza) and the Masonic Avenue and Euclid Avenue intersection (the proposed Corner Plaza) would be partially within the public right-of-way and would total approximately 10,000 square feet of open area. There would also be approximately 8,000 square feet of common useable open area adjacent to the Walnut Street extension and roundabout.

LANDSCAPING

There are 210 trees on and adjacent to the project site including the 15 existing street trees along the California Street frontage. Based on the arborist report, up to ten mature trees on the site could be retained with implementation of health maintenance and tree protection measures.[37] Those determined to be viable would be incorporated into the proposed project and 185 onsite trees would be removed to allow for demolition, excavation, and site preparation, including 19 onsite significant trees (i.e., trees within 10 feet of the public right-of-way that meet specific height, trunk diameter, and canopy width requirements). The 15 street trees along California Street would be removed and replaced. Thus, a total of 34 protected trees on and adjacent to the project site would be removed.[38]

The proposed project would add approximately 92 new street trees along California Street, Masonic Avenue, Euclid Avenue, and Laurel Street. A total of 20 trees would be planted on the

[37] SBCA Tree Consulting, Arborist Report – Laurel Heights 3333 California St. Tree Survey Report, October 19, 2015 (amended), pp. 4-5.

[38] SBCA Tree Consulting, Arborist Report – Laurel Heights 3333 California St. Tree Survey Report, October 19, 2015 (amended) and Protected Tree Survey March 24, 2017 (amended).

extension of Walnut Street into the project site; however, these do not count as street trees because the proposed Walnut Street extension would not be considered a public right-of-way. Thus, approximately 270 new trees would be planted within the project site along the extension of Walnut Street and the proposed Mayfair and Walnut walks as well as within other open areas, including private and common open spaces (a net gain of 85 trees from existing conditions). The proposed project would also retain ten mature existing trees, if viable, as follows:

- The western entrance to the proposed Mayfair Walk would be punctuated by two retained mature Coast Live Oaks that range in height from 30 to 40 feet tall with tree canopies that range in width from 50 to 55 feet wide.
- The proposed Cypress Square would be defined by the retention of two Cypress trees. One is 115 feet tall with a 65-foot-wide canopy, and the other is 65 feet tall with a 60-foot-wide canopy.
- At the proposed Pine Street Steps and Plaza (the eastern end of the proposed Mayfair Walk), a grove of three mature Coast Redwoods would be retained. These trees range in height from 70 to 85 feet tall with tree canopies of 30 feet wide.
- One mature 55-foot-tall Monterey Pine with a 55-foot-wide canopy would highlight the west end of the proposed Euclid Green.
- Two mature 25- to 60-foot-tall Coast Live Oaks with 50-foot-wide canopies would highlight the midblock of Laurel Street between Mayfair Drive and Euclid Avenue.

During the construction phases of the proposed project (described below on pp. 2.91-2.99), trees that would be retained would require anchored tree protection fencing placed at the outer limit of the designated tree root protection zone with direct supervision by the project arborist for any work activities that would occur inside the designated root protection zone. In addition, the 10 trees preliminarily identified for retention would be subject to a number of tree health-related measures to improve the chances for survival, i.e., mulching, pruning, pest control, and increased attention to irrigation and nutritional supplements through laboratory analysis of soil and plant tissue.[39]

PROPOSED INFRASTRUCTURE SYSTEMS

WATER SYSTEMS

Potable

The project site is served by San Francisco's water supply system. The SFPUC water supply piping under the California Street, Presidio Avenue, Euclid Avenue, and Laurel Street roadways that bound the project site consists primarily of 8-inch diameter ductile iron pipes. There is also a

[39] SBCA Tree Consulting, Arborist Report – Laurel Heights 3333 California St. Tree Survey Report, October 19, 2015 (amended), pp. 4-5 and Preliminary Tree Investigation in Four Areas, March 14, 2017.

20-inch-diameter water main under California Street. Water connections would be provided to the new and renovated existing buildings, with each building separately metered at the sidewalk. Domestic hot water would be provided separately at each building through natural gas domestic hot water heaters with storage. To reduce the use of potable water (drinking water) on a per-unit basis, the proposed project would provide water-efficient plumbing fixtures and appliances in new and renovated existing buildings. Low-pressure water for firefighting purposes would be provided from the three existing fire hydrants adjacent to the project site at California and Laurel streets, Masonic and Euclid avenues, and Euclid Avenue/Laurel Street. Two new fire hydrants would be located on the perimeter of the project site on the west side of Masonic Avenue – one near Pine Street and the other near Euclid Avenue. One new fire hydrant would be located near the intersection of the proposed Mayfair and Walnut walks near Center Buildings A and B. This hydrant would be connected via a new lateral under the proposed Mayfair Walk that would connect to the existing 8-inch-diameter water line under Laurel Street. Each of the proposed new and renovated buildings (except the Laurel Duplexes) would include wall-mounted fire connections on the primary facades on California Street, Presidio/Masonic Avenue, Euclid Avenue, and Laurel Street. In addition, fire-fighting water supply storage tanks would be located in Basement Level B3 of Center Building B because of its classification as a high-rise building.

Non-Potable

Each of the new buildings[40] would comply with San Francisco's Non-Potable Water Ordinance which requires the use of onsite "alternate water sources" of graywater (e.g., wastewater from bathtubs, showers, bathroom sinks, and clothes washing machines, but not from kitchen sinks, dishwashers or toilets), rainwater (e.g., precipitation collected from roofs and other above-ground collection surfaces, excluding stormwater runoff), and, if demand/supply is adequate, foundation drainage water (e.g., nuisance groundwater that is pumped out to maintain a building's or facility's structural integrity) to meet that building's toilet and urinal flushing and irrigation demands. The proposed project would include the diversion and reuse of graywater and rainwater for toilet and urinal flushing and irrigation (e.g., green roofs) and cooling towers (for buildings with cooling towers). Each of the renovated and new buildings would include piping and catchment systems for the capture of graywater and rainwater and its distribution and provide space in mechanical rooms in below-grade levels for filtration/treatment systems and holding tanks totaling around 30,000-60,000 gallons at full buildout. The Mayfair Building's proposed non-potable water system would connect to the pipes and catchment systems in the Laurel Duplexes, which would be served by the centralized filtration/treatment system and holding tank located in the basement level of the Mayfair Building.

[40] Only new buildings are required to comply with the Non-Potable Water Ordinance. Non-potable water systems for the Center Building A and Center Building B (the adaptively reused office building) would not need to comply with the Non-Potable Water Ordinance but would need to adhere to engineering and operation requirements consistent with those in the Non-Potable Water Ordinance.

Each of these individual non-potable water systems and the looped Laurel and Mayfair system would be designed, installed, tested and operated pursuant to San Francisco Department of Public Health Rules and Regulations Regarding the Operation of Alternate Water Source Systems.[41] In accordance with the Non-potable Water Ordinance, the project sponsor would be required to treat the alternate water supply to water quality criteria specified by the health department and conduct monitoring to demonstrate compliance with the specified water quality criteria.

WASTEWATER AND STORMWATER SYSTEM

The project site is served by the City's combined sewer system. The SFPUC sewer lines under the California Street, Presidio Avenue, Euclid Avenue, and Laurel Street roadways that bound the project site are primarily vitrified clay pipes that range from 8 to 21 inches in diameter. Sewer line connections would be provided to the new and renovated existing buildings and would include the construction of an approximately 8-inch-diameter, 180-foot-long sewer line extension under Masonic Avenue to connect to the 16-inch-diameter combined sewer main under Presidio Avenue that flows east down Pine Street.[42] The proposed project would be subject to the stormwater management requirements set forth in San Francisco's Stormwater Management Ordinance because it would create and/or replace 5,000 square feet or more of impervious surface. The proposed project would incorporate low impact design features such as bioretention planters located upstream of storm drain catch basins (as part of the proposed streetscape changes) to promote infiltration and limit the amount of stormwater entering the combined sewer system. The proposed project would also implement rainwater harvesting as part of a sitewide landscaping program that would increase permeable/planted areas (in comparison to existing conditions), including at-grade green spaces and green roofs, reducing stormwater from entering the combined sewer system. The proposed project would also capture stormwater on site in cisterns located in the proposed California Street and Masonic garages that would range in size from 150,000 to 200,000 gallons, depending on the amount of the site (including green roofs) that would be planted and permeable. The captured stormwater would be discharged to the combined sewer system and conveyed to the Southeast Water Pollution Control Plant. Proposed control measures would be designed to reduce the peak flow and volume for a 2-year 24-hour design storm event by at least 25 percent, as required.

41 San Francisco Department of Public Health, Director's Rules and Regulations Regarding the Operation of Alternate Water Source Systems, August 2017, https://www.sfdph.org/dph/files/EHSdocs/ehsWaterdocs/NonPotable/SFHC_12C_Rules.pdf, accessed April 9, 2018.

42 Chokshi, Mira, Principal Engineer, San Francisco Public Utilities Commission, e-mail correspondence with Debra Dwyer, Principal Environmental Planner, San Francisco Planning Department, March 6, 2018. City's sewer model indicated that sufficient capacity exists within the Presidio Avenue sewer line to accept wastewater flows from the project site.

ELECTRICITY AND NATURAL GAS

Electrical and natural gas service to the project site would be provided by PG&E from 12 kilovolt distribution lines under California Street and Euclid Avenue and natural gas lines under California Street and Presidio Avenue. Connections to the PG&E grid would be provided to the new and renovated existing buildings and would include the construction of new natural gas lines under Euclid Avenue between Laurel Street and Masonic Avenue (approximately 350 feet), under Masonic Avenue between Euclid and Presidio avenues (approximately 625 feet), and under Presidio Avenue (approximately 75 feet) at the intersection of Presidio Avenue//Masonic Avenue/Pine Street. The proposed extensions would connect to PG&E's existing natural gas infrastructure under Presidio Avenue, California Street and Laurel Street to form a loop around the project site. Each building would contain an electrical room in the basement level that would receive 400/277 Volt service and contain switchboards, panelboards, and secondary transformers. The proposed project would comply with San Francisco Green Building Requirements for energy efficiency in new buildings. Energy-efficient appliances and energy-efficient lighting would be installed in the renovated buildings.

One new emergency diesel generator would be required to serve emergency power loads, fire pumps, and the elevators for Center Building B.[43] The new 800 kilowatt/1,000 kilovolt-ampere emergency diesel generator with a 500-gallon fuel storage tank would be located in a generator room on Basement Level B1 of the Masonic Building. In accordance with Bay Area Air Quality Management District requirements, installation, operation, and testing of the emergency diesel generator would need air quality permits, and the diesel fuel storage tank would need to be registered with the health department.

Renewable Energy

The proposed project is required to meet the state's Title 24 and the San Francisco Green Building requirements for renewable energy, and San Francisco's Better Roof Requirements for Renewable Energy Standards. The proposed project would install roof-mounted solar photovoltaic system infrastructure on 11 of the 13 proposed buildings, except the Masonic Building and Center Building A. At least 15 percent of the roof area would include roof-mounted solar photovoltaic system infrastructure and/or roof-mounted solar thermal hot water systems that would be installed in residential and office buildings. Solar photovoltaic systems transform sunlight into electricity and would partially offset the energy demands of the associated buildings. No ground-mounted facilities are proposed.

[43] The existing emergency generator and related fuel storage and electrical substations in the basement levels of the existing parking garage would be removed as part of demolition activities.

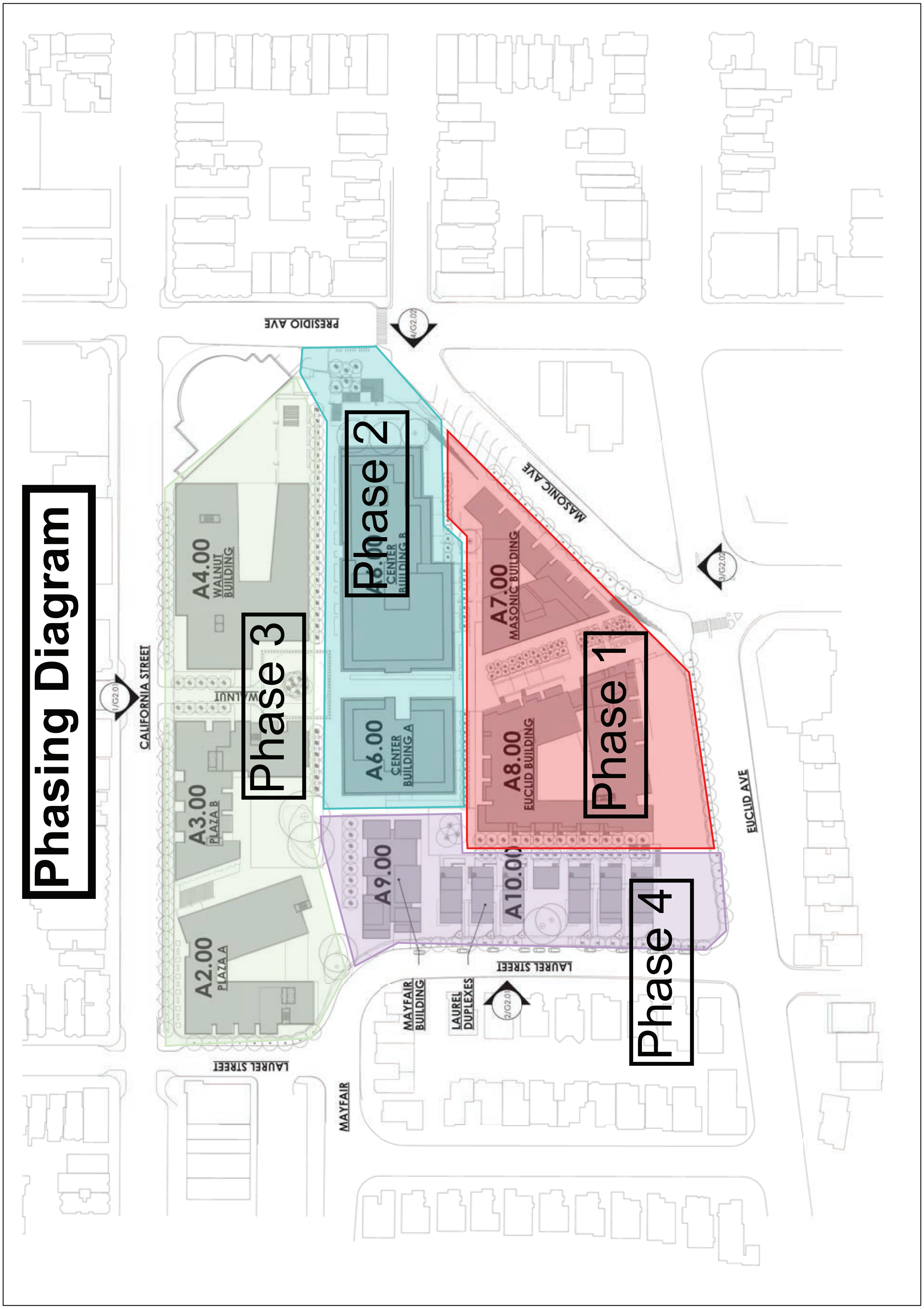
PROPOSED SUSTAINABILITY FEATURES

The project sponsor has committed to meeting and exceeding the requirements of the San Francisco Green Building Ordinance by achieving Leadership in Energy and Environmental Design (LEED) for Neighborhood Development certification at a minimum Gold level for the full development, targeting Platinum. To meet this goal, the project sponsor intends to pursue compliance strategies that promote increased energy efficiency, renewable energy production, and water conservation. The proposed project would incorporate smart building technologies and materials, such as living (or green) roofs, solar photovoltaic systems, and water smart landscaping. The proposed project would develop 8 percent of parking spaces with electric vehicle charging stations while other spaces would be electric vehicle ready.

The proposed project would provide a network of landscaped publicly accessible open areas and private and common open spaces planted with drought-tolerant species. The project sponsor intends to preserve 10 of the 195 existing onsite trees and would plant approximately 92 street trees along California Street, Presidio Avenue, Masonic Avenue, Euclid Avenue, and Laurel Street and approximately 270 trees (including 20 on each side of the proposed extension of Walnut Street) on the project site to replace the approximately 15 street trees and 185 onsite trees that would be removed (net gain of 85 trees).

PRELIMINARY CONSTRUCTION SCHEDULE AND PHASING

The proposed project would be constructed in four overlapping development phases, with full build-out expected to occur approximately seven years after project entitlements, if executed from start to finish of the prescribed overlapping development phases (see Figure 2.30: Preliminary Construction Phasing Diagram). The impact analyses are based on an approximately seven-year construction duration and four-phase program that would constitute maximum development on the site; however, the project sponsor may choose to develop the proposed project or project variant over a timeframe of up to 15 years. The project sponsor may also choose to develop the proposed project or project variant in a different order than the preliminary four-phase construction program described below, i.e., the California Street buildings (preliminarily identified as the Phase 3 development program) could be developed as the Phase 1 development program. For purposes of CEQA, an impact analysis under a seven-year timeframe is the most conservative (or worst case) analysis because it assesses continuous construction over a shorter time period (i.e., more concentrated). Under an up-to-15-year construction timeframe, the same development program would be implemented; however, periods of dormancy would be introduced between construction phases, and some construction activities currently assumed as concurrent would occur separately over a longer timeframe. Thus, potential physical



Source: P/SKS (2017)

3333 CALIFORNIA STREET MIXED USE PROJECT

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FIGURE 2.30: PRELIMINARY CONSTRUCTION PHASING DIAGRAM

environmental effects of the proposed project or project variant under a longer construction timeframe would be similar to, but less severe than, those under a condensed construction timeframe. A different order for the construction phases may result in a potential impact occurring at a different time period within the overall construction program; however, the magnitude or severity of any impact would be substantially the same as that under the preliminary phasing program.

The four development phases are preliminarily identified as Phase 1 (Masonic and Euclid buildings), Phase 2 (Center Buildings A and B), Phase 3 (Plaza A, Plaza B, and Walnut buildings), and Phase 4 (Mayfair Building and Laurel Duplexes). Construction would not commence until all existing uses at the UCSF Laurel Heights Campus, including the existing child care center, have vacated. UCSF anticipates moving services and staff at the Laurel Heights Campus to other UCSF locations, such as the Mission Bay or Parnassus campuses, prior to commencement of any construction activities on the project site.[44] As part of the move, UCSF would adhere to UC Environmental Health and Safety regulations including legally required local and state regulations related to the proper closure process for structural components of their operation (e.g., boilers and fuel storage tanks) as well as the handling and transport of all hazardous materials and waste (laboratory uses). All existing fume hoods, centrifuges, storage containers, piping, and other associated laboratory equipment previously used by UCSF for laboratory uses would be removed or decommissioned as required by applicable laws and regulations.[45]

The preliminary construction schedule assumes spring 2020 as the start of construction and spring 2027 as the end of construction (see Table 2.5: Preliminary Construction Phasing Program).

Construction activities for the four development phases would be sequenced and would last approximately seven years with overlapping construction stages, i.e., the Phase 2 demolition stage for the adaptive reuse of the existing office building (Center Buildings A and B) would commence during the exterior work for the proposed Masonic and Euclid buildings in Phase 1. Construction-related activities would typically occur Monday through Friday, between 7 a.m. and 7 p.m., although some work is anticipated to occur on Saturdays between 7 a.m. and 3 p.m.[46] The

[44] Regents of the University of California, University of California at San Francisco (UCSF) 2014 Long Range Development Plan Environmental Impact Report, p. 3-56, https://www.ucsf.edu/content/lrdp-environmental-impact-report-downloads, accessed May 25, 2018.

[45] University of California at San Francisco (UCSF) Office of Environmental Health and Safety (EHS), UCSF EHS Process for Decommissioning Facilities, September 17, 2018.

[46] Construction activities are allowed between 7 a.m. and 8 p.m. Noise Ordinance section 2908 states that noise from construction activities between the hours of 8 p.m. and 7 a.m. (including erecting, constructing, demolishing, excavating for, altering or repairing) shall not exceed 5 dBA over ambient levels at the nearest property plane unless a work permit has been applied for and granted by the Director of Public Works or the Director of Building Inspection.

contractor would need to comply with the San Francisco Noise Ordinance. Nighttime construction work is not anticipated, nor is construction anticipated to occur on Sundays or major legal holidays. However, if nighttime construction work is necessary for discrete events such as concrete pours or utility work, a special work permit granted by the Director of Public Works or the Director of Building Inspection would be required.

Table 2.5: Preliminary Construction Phasing Program

Phase	Building(s)	Proposed Construction					
		Residential (gsf / units)	**Retail (gsf)**	**Office (gsf)**	**Child Care (gsf)**	**Parking (gsf)**	**Total (gsf)**
Phase 1 (2020-2022)	Masonic and Euclid	266,251 / 196	4,287	--	--	87,977	358,515
Phase 2 (2021-2023)	Center A and Center B	322,888 / 190	--	--	--	19,258	342,146
Phase 3 (2022-2025)	Plaza A, Plaza B, Walnut	138,370 / 128	49,830	49,999	14,690	301,060	553,949
Phase 4 (2025-2027)	Mayfair and Laurel Duplexes	97,182 / 44	--	--	--	20,478	117,660
	TOTAL	***824,691 / 558***	***54,117***	***49,999***	***14,690***	***428,773***	***1,372,270***

Source: Laurel Heights Partners, LLC and Webcor, September 2017

PHASE 1

Phase 1 construction activities associated with the development of the Masonic and Euclid buildings would last approximately 30 months. Construction staging, including concrete truck staging, would occur onsite on the surface parking lots on the west side of the site closest to Laurel and California streets. Phase 1 would include the demolition of the existing annex building and the southern portion of the existing office building (including the auditorium); excavation for the parking garage and building foundations; construction of a sewer line extension under Masonic Avenue; construction of a gas line extension under Euclid, Masonic and Presidio avenues; and the construction of 266,251 gross square feet of residential uses (196 units), 4,287 gross square feet of retail uses, and 87,977 gross square feet of garage space, totaling 358,515 gross square feet of new construction. These demolition activities would entail the removal of the natural gas-fired boilers, chillers, and water treatment facilities within the existing annex building. Removal would be conducted in accordance with applicable regulations of the health department and public utilities commission. Open space improvements would include the development of Masonic Plaza between Center Building B and the Masonic Building, the southern portion of the proposed Walnut Walk, a portion of the proposed Euclid Green, and the proposed Euclid Terrace private open space (adjacent to the eastern end of the proposed Euclid Green), as well as adjacent public right-of-way improvements along portions of Masonic and Euclid avenues. Initial occupancy would be expected to occur as allowed by the building department, which may be prior to the overall construction completion of the phase (anticipated to be the final quarter of 2022).

PHASE 2

The rehabilitation and adaptive reuse of the existing office building at the center of the site under Phase 2 (Center Buildings A and B) would last 24 months, with demolition activities anticipated to commence in month 20 of Phase 1, during the exterior work on the Masonic and Euclid Buildings. Construction staging would occur on site on the surface parking lot at the northeast portion of the site closest to California Street and on the surface parking lot closest to Laurel Street. Concrete truck staging would occur on site on the internal roadway on the northwest portion of the site, on the west end of the proposed Mayfair Walk, and on the surface parking lot closest to Laurel Street. Phase 2 would include the demolition of the northern portion of the existing office building and the circular garage ramp structures; the partial demolition of the existing office building (to be separated into two structures); limited excavation; and interior renovations and seismic upgrades to adaptively reuse the existing office building as two separate residential buildings. These demolition activities would entail removing the emergency diesel generator and the two electrical substations within Basement Levels B1 and B2, respectively, and the above-ground diesel fuel storage tank located adjacent to Basement Level B2. The demolition and removal would be conducted in accordance with applicable regulations of the health department for fuel storage tank closure. Phase 2 development would result in the construction of 320,393 gross square feet of residential uses (190 units) and 23,227 gross square feet of garage space, totaling 343,620 gross square feet of construction. Initial occupancy would be expected to occur as allowed by the building department, which may be prior to the overall construction completion of the phase (anticipated to be the final quarter of 2023). Logistically, portions of the Phase 3 garage construction necessary to commission Phase 2 may occur during this phase.

PHASE 3

Construction of the Plaza A, Plaza B, and Walnut buildings along California Street would last approximately 36 months with demolition activities anticipated to commence on month 15 of Phase 2, during the exterior work on the Center A and B Buildings. Construction staging would occur on site on the surface parking lot closest to Laurel Street. The parking lanes along the south side of California Street and the east side of Laurel Street would be used for staging through the duration of Phase 3. Concrete truck staging would occur on site from the extension of Walnut Street and near the western terminus of the proposed Mayfair Walk. Concrete truck staging would also occur in the parking lane on the west side of Masonic Avenue (for dispatch) and the parking lane on the east side of Laurel Street. Phase 3 would include the demolition of the existing surface parking lots along California Street, excavation for the parking garage and building foundations; and construction of 138,370 gross square feet of residential uses (128 units), 49,830 gross square feet of retail uses, 49,999 gross square feet of office uses, 14,690 gross square feet of childcare space, and 301,060 gross square feet of garage space, totaling 553,949 gross square feet of new construction. Open space improvements would include the development of the northern portion of Walnut Walk, Mayfair Walk, Presidio Overlook, and Pine Plaza as well as adjacent public right-of-way improvements along California Street and Presidio Avenue. Initial occupancy would be expected to occur as allowed by the building department, which may be prior to the overall construction completion of the phase (anticipated to be the first quarter of 2026).

PHASE 4

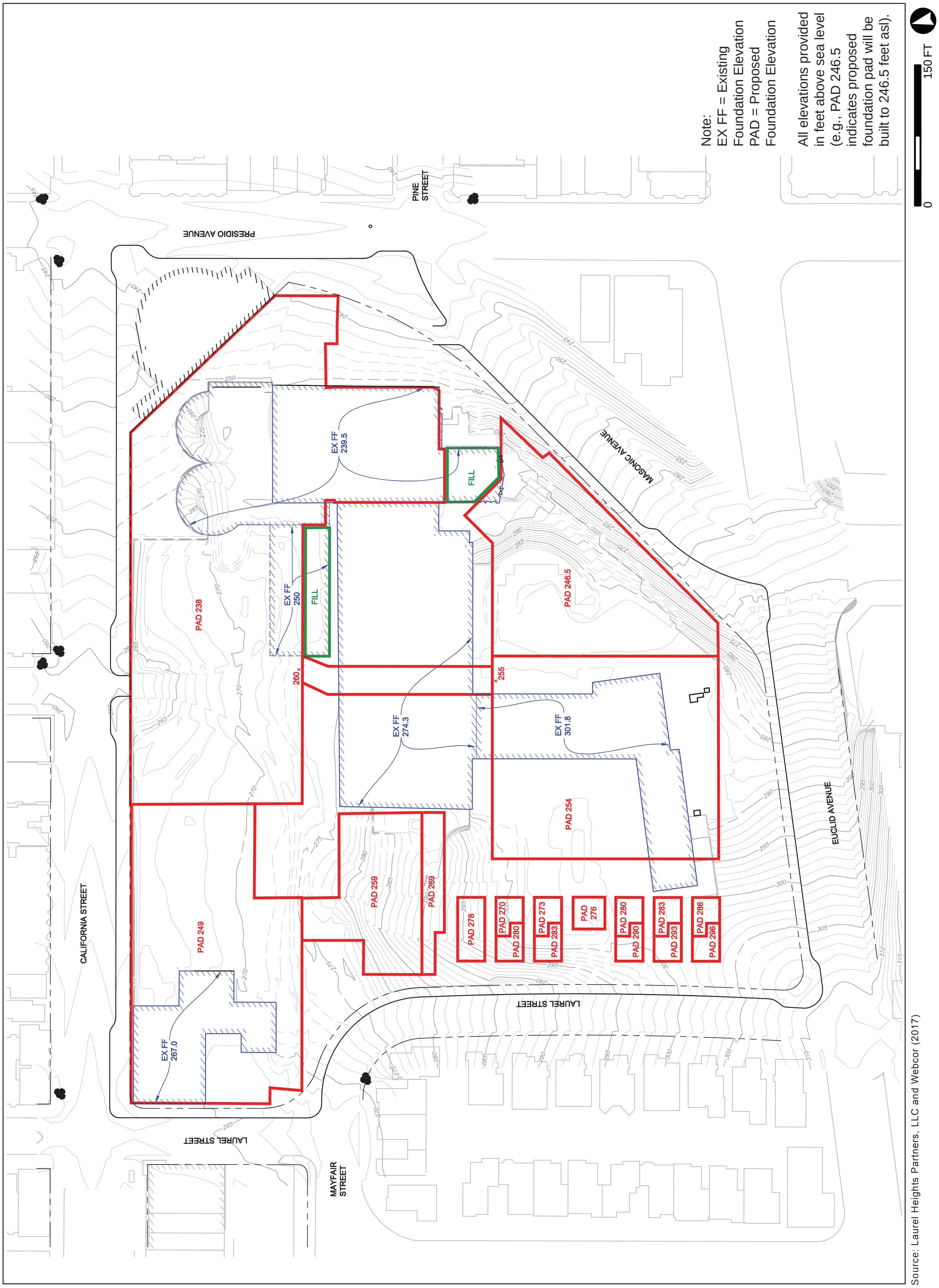
Phase 4 construction activities associated with the development of the Mayfair Building and Laurel Duplexes would last approximately 20 months, with demolition activities anticipated to commence on month 30 of Phase 3, during the interior work on the Plaza A, Plaza B, and Walnut Buildings. Construction staging would occur within the parking lane along the east side of Laurel Street and on a portion of the parking lane on the north side of Euclid Avenue (near Laurel Street), which would be used for staging through the duration of Phase 4. Concrete truck staging would occur in the parking lane on the west side of Masonic Avenue (for dispatch) and the parking lane on the east side of Laurel Street. Phase 4 would include a limited amount of demolition; limited excavation for the parking garage and building foundations; and the construction of 97,182 gross square feet of residential uses (44 units) and 20,478 gross square feet of garage space, totaling 117,660 gross square feet of new construction. Open space improvements would include the development of the western end of the proposed Euclid Green as well as adjacent public right-of-way improvements along Euclid Avenue and Laurel Street. Initial occupancy would be expected to occur as allowed by the building department, which may be prior to the overall construction completion of the phase (anticipated to be the second quarter of 2027).

DEMOLITION, EXCAVATION AND SOILS DISTURBANCE

The proposed project would result in the generation of approximately 47,000 cubic yards of demolition debris[47] and would involve substantial amount of soils disturbance and excavation, specifically for construction of the below-grade parking garages, building foundations, and site terracing (see Figure 2.31: Preliminary Excavation Plan). Approximately 274,000 square feet of the 446,479-square-foot project site would be modified as a result of the proposed project. The depths of excavation would range from 7 to 40 feet below the existing grade (including the elevators and automobile stacker pits) with a total of approximately 241,300 net cubic yards of excavated soils generated during the approximately seven-year construction period. Thus, approximately 288,300 cubic yards of demolition debris and excavated soils would be removed from the project site.[48]

[47] Denney, Brad, Vice President, Webcor, e-mail correspondence with Peter Mye, SWCA, about details of demolition and excavation totals, October 23, 2017.

[48] Approximately 3,700 cubic yards of excavated soils would be reused on the project site as fill.



Source: Laurel Heights Partners, LLC and Webcor (2017)

3333 CALIFORNIA STREET MIXED USE PROJECT

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FIGURE 2.31: PRELIMINARY EXCAVATION PLAN

Demolition and debris removal would be conducted in accordance with applicable regulations for asbestos, lead-based paint, universal waste, medical waste, and other hazardous building materials. Excavation and site grading would be conducted in accordance with the procedures established in a construction dust control plan that must be reviewed and approved by the health department pursuant to the construction dust control ordinance (article 22B of the health code), an asbestos dust mitigation plan that must be reviewed and approved by the Bay Area Air Quality Management District pursuant to the state Asbestos Airborne Toxic Substances Control Measure for Construction, and the site mitigation plan that must be reviewed and approved by the health department pursuant to the Maher ordinance (article 22A of the health code).

According to Langan Treadwell Rollo's 2014 *Preliminary Geotechnical Investigation*,[49] the project site is blanketed by fill extending between 3 to 10 feet below ground surface. The fill consists of loose to medium dense sand and gravel, and medium stiff to stiff clay, sandy clay, and clayey silt with wood and brick fragments. It is underlain by layers of stiff to very stiff clay and medium dense to dense sand and clayey sand to depths of approximately 7 to 31 feet below ground surface. Bedrock, consisting of sandstone and serpentinite, was encountered below the clay and sand deposits. Bedrock is relatively shallow, 7 to 17 feet below ground surface, at the southern and eastern portion of the site, and is relatively deep, at approximately 31 feet below ground surface, at the northwest end of the site. Pile driving is not proposed; however, rock fragmentation using earth moving equipment, such as loaders, heavy-duty backhoes, hoe-rams, dozers equipped with rippers, and jack hammers, would be expected.

Serpentinite contains naturally occurring asbestos and underlies a portion of the 10.25-acre project site. Due to the potential to encounter serpentinite, the size of the project site (over one-half of an acre), and the known presence of contaminated soils, an asbestos dust mitigation plan, a construction dust control plan, and a site mitigation plan would need to be prepared prior to any demolition or excavation. Bedrock handling and disposal would be performed in accordance with the asbestos dust mitigation plan. Excavated soils would be tested for the presence of contaminants in accordance with the site mitigation plan in order to divert contaminated soils to regional landfills licensed to handle hazardous waste and minimize the amount of off-haul soils requiring disposal at regional landfills. Any soils determined to be qualified for use as fill would be stockpiled on site and reused throughout the project site to the maximum extent feasible. If not needed for use on the project site, local demand for clean fill could be identified as part of a landfill diversion strategy in the documentation required for determining compliance with the Construction Demolition and Debris Recovery Ordinance.

Groundwater levels encountered in borings drilled at the site were generally between 18 and 39 feet below ground surface. Based on a 40-foot-deep maximum depth of excavation the bottom

[49] Langan Treadwell Rollo, *Preliminary Geotechnical Investigation, 3333 California Street, San Francisco*, December 3, 2014 (hereinafter referred to as "Geotechnical Investigation").

of the proposed excavation is expected to be below the groundwater level. Furthermore, groundwater or perched water could be encountered during the drilling of soldier pile foundations; therefore, dewatering may be needed.[50]

The proposed new buildings would be supported on continuous and/or individual foundations bearing on native stiff to very stiff clay, medium dense sand, or bedrock.[51] Any loose sand under the proposed buildings' footprints would be removed to ensure seismic stability. The perimeter walls of new buildings adjacent to the existing parking garage may need to be supported on drilled piers that gain support in the bedrock below the elevation of the bottom of the existing parking garage. Foundation work would not be required to support the proposed addition of up to a maximum of two residential floors to the adaptively reused Center Buildings A and B; however, where shear walls terminate at the foundation level, new or expanded footings would be required for the improved seismic systems for Center Buildings A and B.

As described above, streetscape, landscaping, and open space improvements would occur in tandem as the respective phases are developed. All construction materials storage would occur on the project site. No offsite staging areas would be needed. The number of construction workers on the site would vary from 75 to 175 depending on the stage of construction (i.e., Phase 1, Phase 2) and the types of construction activities (e.g., demolition, excavation, foundation work) being undertaken concurrently. Some construction worker parking would be provided on the project site; however, during Phase 1, the Phase 3 and 4 overlap, and Phase 4, offsite parking (with shuttle service to the project site) would be located within a mile of the project site. The construction cost estimate is approximately $400 million.

WALNUT BUILDING VARIANT

The project sponsor is considering a variant to a portion of the proposed project, referred to as the Walnut Building Variant (project variant). The project variant would allow for the development of 744 dwelling units on the project site; an increase of 186 dwelling units over the number in the proposed project. Under the project variant, the 49,999 gross square feet of office space in the proposed Walnut Building would instead be developed for housing. The proposed Walnut Building would have a total of 368,170 gross square feet, with 153,920 gross square feet of residential uses, 18,800 gross square feet of retail uses, a 14,650-gross-square-foot childcare use, and an 180,800-gross-square-foot below-grade parking garage with 252 parking spaces (74 more than under the proposed project). (See Table 2.6: Characteristics of Proposed Buildings on the Project Site under the Project Variant.) The overall height of the proposed Walnut Building under the project variant would be approximately 67 feet (compared to 45 feet with the proposed

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[50] Geotechnical Investigation, pp. 5, 9, and 11.
[51] Geotechnical Investigation, pp. 13-22.

Table 2.6: Characteristics of Proposed Buildings on the Project Site under the Project Variant

Building Characteristics (same as or *different* than proposed project)	Center Bldg. A (same)	Center Bldg. B (same)	Plaza A Building (same)	Plaza B Building (same)	*Walnut Building (different)*	Masonic Building (same)	Euclid Building (same)	Laurel Duplexes (same)	Mayfair Building (same)	*Total (different)*
Location	Center of Site (Office Bldg. Renovation)		*California Street (New Construction)*			Presidio/Masonic/Euclid (New Construction)		Laurel Street (New Construction)		
Building Height	80 ft.	80 – 92 ft.	45 ft.	45 ft.	*67 ft.*	40 ft.	40 ft.	37 - 40 ft.	40 ft.	--
Number of Stories	6	6 - 7	4	4	*6*	4 - 6	4 - 6	4	4	--
Use (gsf)	**89,465**	**252,681**	**144,878**	**145,618**	***368,170***	**124,892**	**233,623**	**58,839**	**58,821**	***1,476,987***
Residential	89,465	233,423	66,150	72,220	*153,920*	88,906	177,345	54,111	43,071	*978,611*
Retail	0	0	14,178	11,328	*18,800*	0	4,287	0	0	*48,593*
Child Care	0	0	0	0	*14,650*	0	0	0	0	*14,650*
Parking	0	19,258	64,550	62,070	*180,800*	35,986	51,991	4,728	15,750	*435,133*
Dwelling Units	**51**	**139**	**67**	**61**	***186***	**61**	**135**	**14**	**30**	***744***
Studio+1 bedroom	24	50	40	30	*185*	27	50	0	14	*420*
2 bedroom	11	51	23	25	*1*	24	54	1	6	*196*
3 bedroom	10	29	4	6	*0*	10	31	1	10	*101*
4 bedroom	6	9	0	0	*0*	0	0	12	0	*27*
Vehicle Parking Spaces	**51** [Note A]	**139** [Note A]	**170**	**95**	***253***	**61**	**148**	**14** [Note B]	**30**	***970*** [Note D]
Residential	51	139	67	61	*186*	61	135	14	30	*744*
Retail	0	0	43	34	*38*	0	13	0	0	*128*
Commercial	0	0	60	0	*0*	0	0	0	0	*60*
Child Care	0	0	0	0	*29*	0	0	0	0	*29*
Bicycle Parking Spaces [Note E]	**56**	**153**	**96**	**77**	***237***	**67**	**156**	**15**	**33**	***890***
Residential Class 1/Class 2	51 / 5	139 / 14	67 / 7	61 / 6	*186 / 19*	61 / 6	135 / 14	14 / 1	30 / 3	*744 /75*
Retail Class 1 [Note F]/Class 2	0	0	10 / 12	0 / 10	*4 / 8*	0	0 / 7	0	0	*14 / 37*
Child Care Class 1/Class 2	0	0	0	0	*10 / 10*	0	0	0	0	*10 / 10*

Notes:

A Parking for Center Buildings A and B would be provided in Basement Levels B1 and B3 under Center Building B (32 spaces), in Basement Level B1 of the proposed California Street Garage (106 spaces), and in Basement Level B1 of the proposed Masonic Garage (52 spaces).

B The two parking spaces for the Laurel Duplex without a private parking garage would be located within the proposed Masonic Garage.

C Includes the 9 car-share spaces and 26 Americans with Disabilities Act accessible spaces. Pursuant to San Francisco Green Building Code sections 4.106.4 and 5.106.5 up to 8 percent of parking spaces would be developed with electric vehicle charging stations and other spaces would be electric vehicle ready.

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

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

Source: Laurel Heights Partners, LLC; BAR Architects; Solomon Cordwell Buenz; and Jensen Architects (August 2017) project) and 5 levels over Basement Level B1 (compared to two levels with the proposed project). In addition, the shape of the proposed Walnut Building under the project variant would differ from that under the proposed project. For example, rather than being a U-shaped building open to the east, the proposed structure would be rectangular in shape with two interior courtyards. (See Figure 2.32: Project Variant Site Plan and Figure 2.33: Proposed Walnut Building Elevations and Sections for Project Variant.) The height of Level 1 in the project variant would remain the same as that for the proposed project (approximately 15 feet).

Under the project variant, there would be less space devoted to retail uses in the Walnut Building, 5,524 gross square feet less than in the proposed project. There would be 6,360 gross square feet more space devoted to mechanical and storage uses in the California Street Garage than in the proposed project. A portion of the parking on Basement Level B3 for the residential use in the Walnut Building would be provided in mechanical stackers. The mechanical stacker system would be a multicar, independently accessed system that residents would use to retrieve and return their own vehicles (i.e., they would be able to operate the system without assistance from a valet).

Overall, 1,476,987 gross square feet of new and rehabilitated space, comprising 978,611 gross square feet of residential floor area, 48,593 gross square feet of ground floor retail spaces, and 14,650 gross square feet of childcare center space, would be developed under the project variant. Up to 970 vehicle parking spaces, including nine car-share spaces, would be provided in multiple garages with up to three subterranean levels totaling 435,133 gross square feet. Approximately 236,000 square feet of the project site would be retained as open area, including the development of common and private open space throughout the site, the same open space and public access program that would be provided with the proposed project.

Under the project variant the footprints of the other proposed new buildings would not change and the design program would be similar to the one for the proposed project. The preliminary construction phasing plan would also be applicable to the project variant, described in detail on pp. 2.91-2.99, with the exception of Phase 3. Under the project variant, Phase 3 would include the development of 153,920 gross square feet of residential uses (186 units), substituting for 49,999 gross square feet of office space and 5,524 gross square feet of retail space in the Walnut Building. Under the project variant, Phase 3 garage space would increase by 6,360 gross square feet (from 301,060 gross square feet for the proposed project to 307,420 gross square feet).

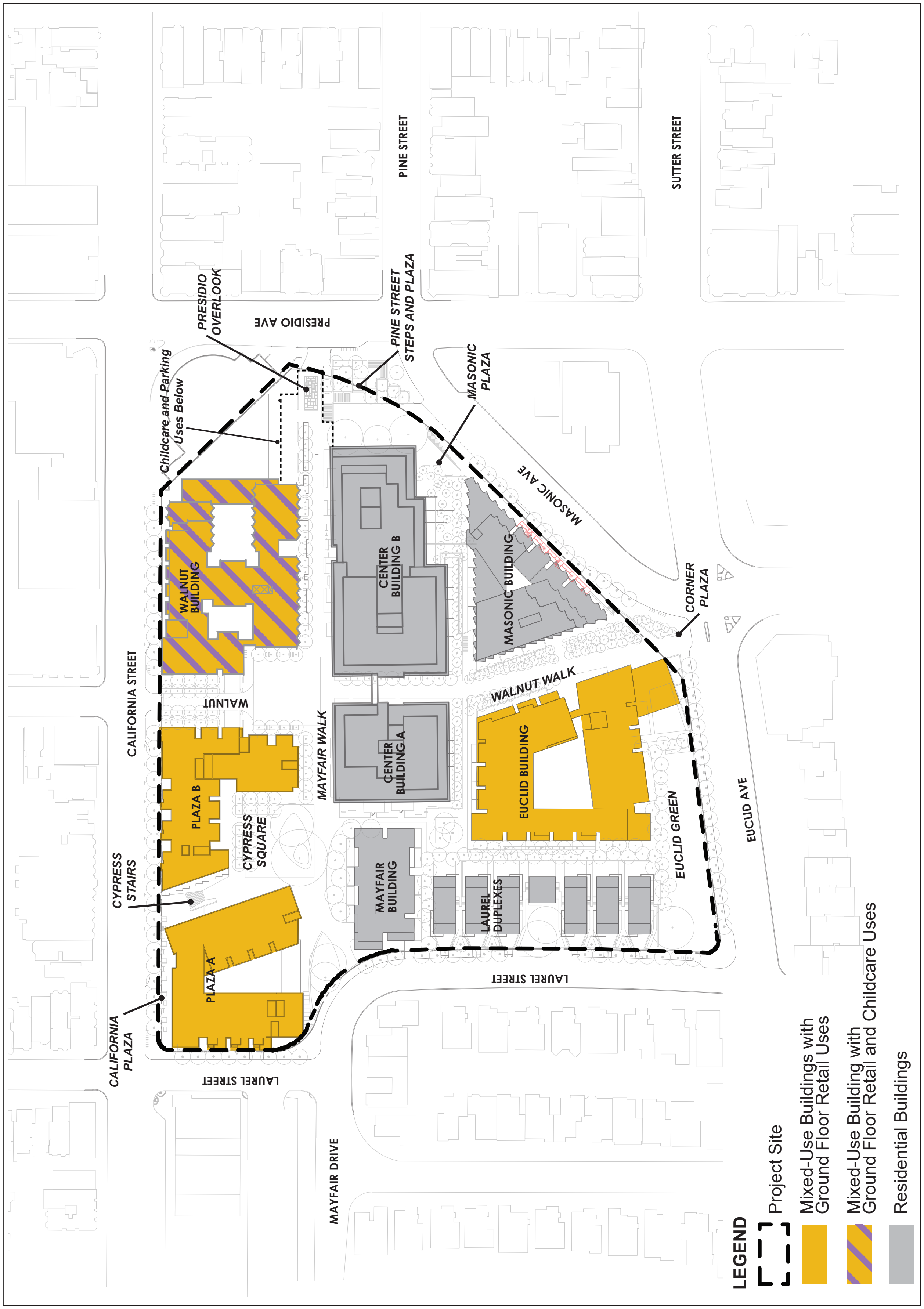
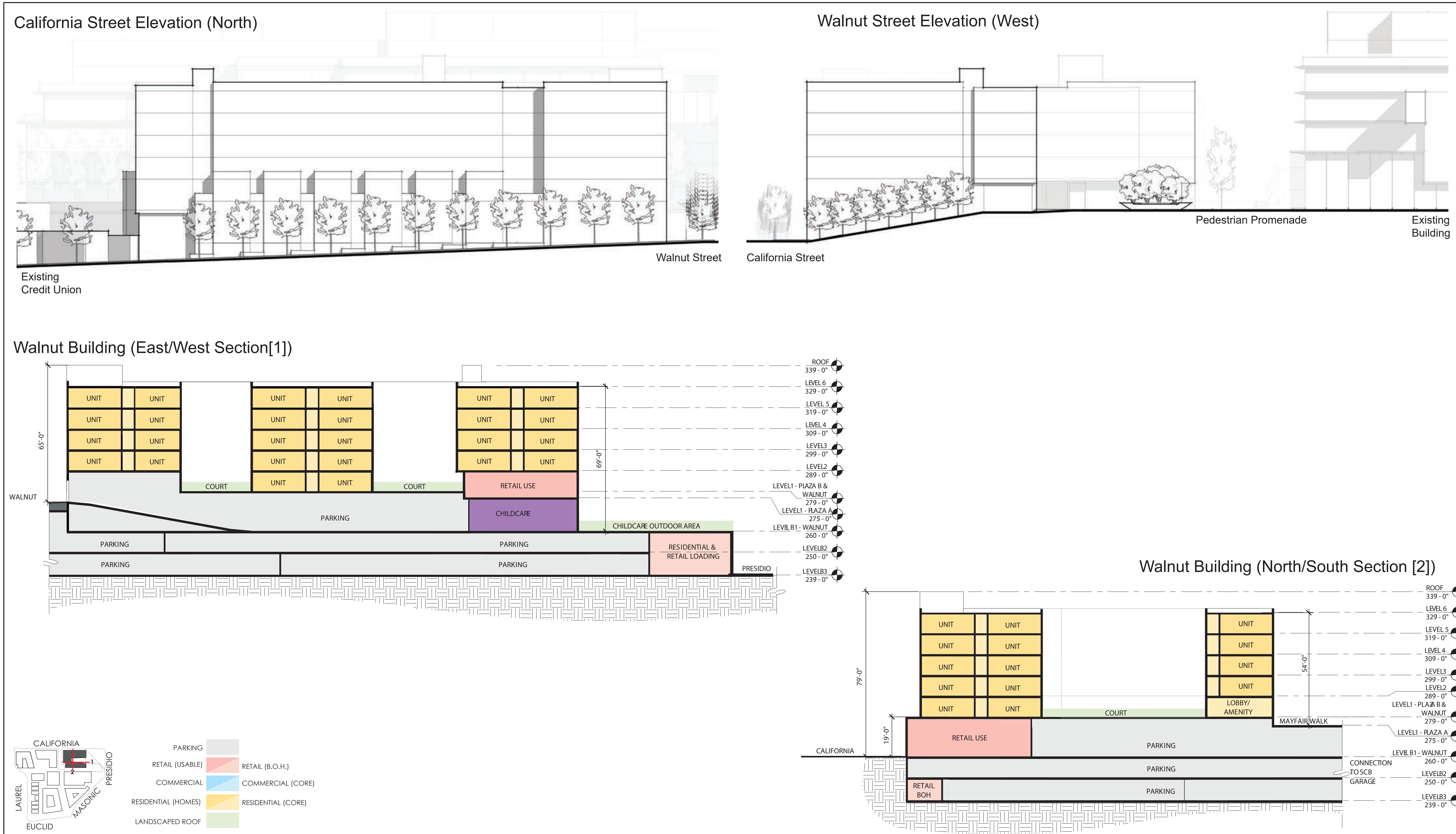


FIGURE 2.32: PROJECT VARIANT SITE PLAN

3333 CALIFORNIA STREET MIXED-USE PROJECT

2015-014028ENV



Source: Laurel Heights Partners, LLC (2017)

3333 CALIFORNIA STREET MIXED USE PROJECT

FIGURE 2.33: PROPOSED WALNUT BUILDING ELEVATIONS AND SECTIONS FOR PROJECT VARIANT

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E. INTENDED USES OF THE EIR

An EIR is an informational document that is intended to inform the public and the decision-makers of the environmental consequences of a proposed project and to present information about measures and feasible alternatives to avoid or reduce the proposed project's identified significant environmental impacts. This is a project-level EIR that provides the environmental information and evaluation that is necessary for decision-makers to approve the proposed 3333 California Street Mixed-Use Project, prepared by the City and County of San Francisco pursuant to the California Environmental Quality Act (California Public Resources Code section 21000 et seq. and California Code of Regulations Title 14, sections 15000 et seq., "CEQA Guidelines"). It analyzes construction and operation of the proposed project and project variant at a project-specific level.

Before any discretionary project approvals may be granted for the proposed project or project variant, the San Francisco Planning Commission (Planning Commission) must certify the EIR as adequate, accurate, and objective. This Draft EIR will undergo a public comment period (from November 8, 2018 to Monday December 24, 2018) as noted on the cover of this EIR, during which time the Planning Commission will hold a public hearing on the Draft EIR. Following the close of the public comment period, the Planning Department will prepare and publish a Responses to Comments document, containing all comments received on the Draft EIR and the Planning Department's responses to substantive environmental comments. It may also contain specific changes to the Draft EIR text and/or figures. The Draft EIR, together with the Responses to Comments document, including revisions to the Draft EIR, if any, will be considered for certification by the Planning Commission at a public hearing and certified as a Final EIR if deemed adequate, accurate, and objective.

ANTICIPATED APPROVALS

Implementation of the proposed project or project variant would require changes to existing development controls for the project site through planning code, and zoning map amendments including changes to allow office and retail as permitted uses and changes to allow increased heights along California Street (increasing from 40 to 45 feet to accommodate higher ceilings for ground-floor retail uses), and at the center of the site (from 40 feet to 80 and 92 feet) for the renovated buildings resulting from the adaptive reuse of the existing office building. The project sponsor would seek to create a new Special Use District (SUD), which would require a recommendation by the Planning Commission and approval by the Board of Supervisors. The project sponsor would also seek approval of a conditional use authorization/planned unit development to permit development of buildings with heights in excess of 50 feet and to provide for minor deviations from the provisions for measurement of height, to allow for more residential units than principally permitted in the RM-1 Zoning District, and to allow certain planning code exceptions. It is anticipated that the project sponsor would seek approval of a development agreement between the City and the project sponsor (which requires recommendation for approval by the Planning Commission and approval by the Board of Supervisors) with respect to, among other community benefits, the project sponsor's commitment to the amount of affordable housing developed as part of the proposed project or project variant and to develop and maintain privately owned, publicly accessible open space, and would vest the project's entitlements for a 15-year period.

The following is a preliminary list of San Francisco agencies' anticipated approvals for the proposed project and the project variant and is subject to change. These approvals may be reviewed in conjunction with the required environmental review, but may not be granted until after the required environmental review is completed.

Actions by the City Planning Commission

- Certification of Environmental Impact Report (EIR) and adoption of findings under CEQA.
- Adoption of Findings of Consistency with the general plan and priority policies of Planning Code section 101.1.
- Recommendation to the Board of Supervisors of an amendment to the Height and Bulk Map to increase height limits along California Street from 40 to 45 feet to accommodate higher ceilings for ground-floor retail uses, and at the center of the site (from 40 feet to 80 and 92 feet) for the renovated buildings resulting from the adaptive reuse of the existing office building.
- Recommendation to the Board of Supervisors of an amendment to the Special Use District Map to designate the boundaries of the Special Use District.
- Recommendation to the Board of Supervisors of a Special Use District to reflect other planning code compliance issues, including to allow office and retail uses at the project site and to modify or waive the requirements of Resolution 4109.
- Conditional Use/Planned Unit Development authorization to permit development of buildings with height in excess of 50 feet and provide for minor deviations from the provisions for measurement of height, to provide for additional dwelling unit density under the project variant, and to provide other exceptions to the planning code requirements applicable to the project site.
- Approval of office allocation for up to 49,999 square feet (Planning Code section 321).
- Recommendation to Board of Supervisors to approve a Development Agreement with respect to, among other community benefits, the project sponsor's commitment to the amount of affordable housing developed as part of the proposed project or project variant and to develop and maintain privately owned, publicly accessible open space and vesting the project's entitlements for a 15-year period.
- Approval of a Transportation Demand Management Plan (Planning Code section 169).

Actions by the San Francisco Board of Supervisors

- Adoption of findings under CEQA
- Adoption of Findings of Consistency with the General Plan and priority policies of Planning Code section 101.1
- Approval of planning code and zoning map amendments, including Special Use District
- Approval of Development Agreement
- Approval of sidewalk widening legislation
- Adoption of resolution to modify or waive Planning Commission Resolution 4109

Actions by Other City Departments

- San Francisco Public Works
  - Approval of Subdivision Map
  - Public hearing and approval of permits to remove and replace street trees on California Street and to remove protected trees on the project site within 10 feet of the public right-of-way
  - Approval of permits for streetscape improvements in the public right-of-way, including new curb cuts on Masonic Avenue (two) and Laurel Street (eight)
  - Approval of encroachment permit for the proposed development of the Corner Plaza at Masonic and Euclid avenues, the Pine Street Steps and Plaza at the Masonic/Pine/Presidio intersection, curb bulb-outs and associated streetscape improvements on the west side of Presidio Avenue at the intersection with Pine Street and Masonic Avenue, on the west side of Masonic Avenue at the intersection with Euclid Avenue, and on the east side of Laurel Street at the intersection with Mayfair Drive, and for sidewalk widening
  - Approval of a street space permit from the Bureau of Street Use and Mapping if sidewalk(s) are used for construction staging and pedestrian walkways are constructed in the curb lane(s)
  - Recommendation to Board of Supervisors to approve legislation for sidewalk widening
- San Francisco Municipal Transportation Agency
  - Approval of request for on-street commercial truck (yellow) and passenger (white) loading zones on Laurel Street, California Street, Masonic Avenue, and Euclid Avenue
  - Approval of a special traffic permit from the Sustainable Streets Division if sidewalk(s) are used for construction staging and pedestrian walkways are constructed in the curb lane(s)
  - Approval of construction within the public right-of-way (e.g., bulbouts and sidewalk extensions) to ensure consistency with the Better Streets Plan
  - Approval of the placement of bicycle racks on the perimeter sidewalks and within the project site

- San Francisco Department of Building Inspection
  - Review and approval of demolition, excavation, and site/building permits
  - Review and approval of construction permit for non-potable water system
  - Approval of a permit for nighttime construction if any night construction work is proposed that would result in noise greater than five dBA above ambient noise levels, as applicable.
  - Review and approval of plumbing plans for non-potable water reuse system per the Non-potable Water Ordinance
- San Francisco Public Utilities Commission
  - Review and approval of Erosion and Sediment Control Plan, in accordance with article 4.1 of the public works code
  - Review and approval of any changes to sewer laterals (connections to the City sewer system)
  - Review and approval of any changes to existing publicly-owned fire hydrants, water service laterals, water meters, and/or water mains
  - Review and approval of the size and location of new fire, standard, and/or irrigation water service laterals
  - Review and approval of post-construction stormwater design guidelines including a Stormwater Control Plan, in accordance with City's 2016 Stormwater Management Requirements and Design Guidelines
  - Review and approval of Landscape Plan per the Water Efficient Irrigation Ordinance
  - Approval of the use of dewatering wells per article 12B of the health code (joint approval by the health department)
  - Review and approval of documentation for non-potable water reuse system per the Non-potable Water Ordinance
- San Francisco Department of Public Health
  - Review and approval of Site Mitigation Plan, in accordance with San Francisco Health Code article 22A (Maher Ordinance)
  - Review and approval of a Construction Dust Control Plan, in accordance with San Francisco Health Code article 22B (Construction Dust Control Ordinance)
  - Approval of the use of dewatering wells per article 12B of the health code (joint approval by the San Francisco Public Utilities Commission)
  - Review and approval of design and engineering plans for non-potable water reuse system and testing prior to issuance of Permit to Operate

Actions by Other Government Agencies

- Bay Area Air Quality Management District
  - Approval of any necessary air quality permits for installation, operation, and testing (e.g., Authority to Construct/Permit to Operate) for individual air pollution sources, such as boilers and emergency standby diesel generator
  - Approval of Asbestos Dust Mitigation Plan for construction and grading operations

3. PLANS AND POLICIES

CEQA Guidelines section 15125(d) requires that an EIR discuss "any inconsistencies between the proposed project and applicable general plans, specific plans, and regional plans." Chapter 3, Plans and Policies, provides a summary of relevant local and regional plans and policies that are applicable to the proposed project or project variant, with a particular focus on the project's potential inconsistencies with applicable plans and policies that could result in environmental impacts.

Policy conflicts do not, in and of themselves, indicate a significant environmental effect within the meaning of CEQA. To the extent that physical environmental impacts may result from such conflicts, such impacts are analyzed in their specific topical sections in Chapter 4, Environmental Setting and Impacts, and in Section E, Evaluation of Environmental Effects, of the initial study that was published on April 25, 2018 (Appendix B to this EIR). The proposed project or project variant would intensify land uses on an urban infill site, and to the extent that there are conflicts between the proposed project or project variant and applicable plans, policies, and regulations, those conflicts would be considered by City decision-makers when they decide whether to approve, modify, or disapprove the proposed project or project variant. The staff reports and approval motions prepared for the decision-makers would include a comprehensive project analysis and findings regarding the consistency of the proposed project or project variant with applicable plans, policies, and regulations independent of the environmental review process.

A. SAN FRANCISCO GENERAL PLAN

The *San Francisco General Plan* (general plan) is the embodiment of the City's vision for the future of San Francisco. It provides general policies and objectives to guide land use decisions and contains some policies that relate to physical environmental issues. The general plan comprises a series of ten elements, each of which pertains to a particular topic that applies Citywide: Air Quality, Arts, Commerce and Industry, Community Facilities, Community Safety, Environmental Protection, Housing, Recreation and Open Space, Transportation, and Urban Design. The general plan also includes area plans, each of which focuses on a particular area of the City. The project site is not within any geographic area covered by an area plan.

The San Francisco Planning Department, Planning Commission, Board of Supervisors, and other City decision-makers will evaluate the proposed project or project variant for conformance with the objectives and policies of the general plan, and will consider potential inconsistencies as part of the decision-making process. The consideration of general plan objectives and policies is carried out independent of the environmental review process, as part of the decision to approve, modify, or disapprove a proposed project. Any potential conflict not identified in this EIR would be considered in that context and would not alter the analysis of physical environmental impacts found in this EIR.

Three general plan elements that are particularly applicable to planning considerations associated with the proposed project or project variant are the Housing, Urban Design, and Recreation and Open Space elements, as described below. Other elements of the general plan that are applicable to physical environmental impacts of the proposed project or project variant are the Transportation, Air Quality, and Environmental Protection elements, as described below. To the extent that the objectives or policies contained in these elements have been adopted for the purpose of addressing physical environmental impacts as defined by CEQA and are applicable to the proposed project or project variant, these environmental regulations are described in the appropriate topical sections in Chapter 4, Environmental Setting and Impacts, of this EIR or in the initial study (Appendix B of this EIR). No inconsistencies resulting in or associated with significant environmental impacts have been identified.

Housing Element

The 2014 Housing Element is a component of the general plan that establishes the City’s overall housing policies. California State Housing Element law (California Government Code sections 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. A particular focus of the Housing Element is on the creation and retention of affordable housing, which reflects intense demand for such housing, a growing economy (which itself puts increasing pressure on the existing housing stock), and a constrained supply of land (necessitating infill development and increased density). In general, the proposed project or project variant would support the goals of the 2014 Housing Element to increase the City’s housing supply (both market-rate and affordable housing), especially in areas that are close to the City’s job centers and are well-served by transit. The proposed project or project variant, both of which are mixed-use projects that include housing, would not obviously conflict with any objectives or policies in the 2014 Housing Element and would further various policies related to increasing production of housing, including affordable housing.

Urban Design Element

The general plan’s Urban Design Element addresses the physical character and order of the City, and the relationship between people and their environment. The Urban Design Element includes policies related to historic preservation (Policy 2.4) and rehabilitation of historic structures (Policy 2.5).

Implementation of the proposed project or project variant would result in the partial demolition of the Midcentury Modern-designed corporate campus (building and landscape), considered a historical resource under CEQA due to its eligibility for listing in the California Register of Historical Resources at the local level of significance as an individual property under Criterion A/1 (Events) and Criterion C/3 (Architecture/Design/Construction). Therefore, the proposed project or project variant could potentially conflict with Policy 2.4 of the Urban Design Element, to "preserve notable landmarks and areas of historic, architectural or aesthetic value, and promote the preservation of other buildings and features that provide continuity with past development." Associated physical environmental impacts are discussed in Section 4.B, Historical Architectural Resources, in this EIR.

Some of the proposed new buildings and the adaptively reused building in the proposed project or project variant would exceed the existing 40-foot height limit as set forth in the planning code and height maps (see Subsection B, San Francisco Planning Code, below). Urban Design Guidelines Map 4, "Urban Design Guidelines for Height of Buildings," and Policy 3.5, "Relate the height of buildings to important attributes of the city pattern and to the height and character of existing development" of the general plan provide general guidance on heights of buildings and their relationship with the urban form, but do not set limits on heights; thus, the proposed project or project variant would not obviously conflict with either Map 4 or Policy 3.5.

As noted in Chapter 1, Introduction, pp. 1.3-1.4, Public Resources Code section 21099(d), effective January 1, 2014, provides that "aesthetics and parking impacts of a residential, mixed-use residential, or employment center project on an infill site located within a transit priority area shall not be considered significant impacts on the environment." The proposed project and project variant meet each of the criteria provided by Public Resources Code section 21099(d), and thus the determination of significance of project impacts under CEQA does not consider aesthetics. However, the City may consider Urban Design Element policies during the subsequent design review process, separate from environmental review.

Recreation and Open Space Element

The general plan's Recreation and Open Space Element (ROSE), revised and updated in April 2014, addresses the character of the City's open spaces and calls for the preservation and enhancement of open spaces through community engagement. Specifically, the ROSE calls for the acquisition of open space in high needs areas (Policy 2.1) and supporting the development of civic-serving open spaces (Policy 2.6). The project site is not located in a high-needs area. The proposed project or project variant would comply with planning code section 135 requirements for open space, including more than 85,000 square feet of private open space and approximately 103,000 square feet of common open space, with some portion of the proposed common open space open to the public. The proposed project or project variant would not obviously conflict with any objectives or policies in the ROSE.

Transportation Element

The Transportation Element of the general plan is composed of objectives and policies that relate to the eight aspects of the citywide transportation system: general regional transportation, congestion management, vehicle circulation, transit, pedestrian, bicycles, citywide parking, and goods movement. The congestion management section of the element references San Francisco's Transit-First Policy, which encourages use of transit and other alternative modes of transportation, and gives priority to the maintenance and expansion of the local transit system and the improvement of regional transit coordination. Section 4.C, Transportation and Circulation, pp. 4.C.31-4.C.34, outlines policies applicable to the proposed project or project variant. In particular, Objective 11 of the congestion management section of the element is provided to establish public transit as the primary mode of transportation in San Francisco and as a means through which to guide future development and improve regional mobility and air quality. Policy 11.3 is provided under this objective to encourage development that efficiently coordinates land use with transit service, requiring that developers address transit concerns as well as mitigate traffic problems.

Although the proposed project or project variant would have a significant and unavoidable transit impact associated with Muni's 43 Masonic route, as project-generated transit ridership would cause ridership to increase from the current 84 percent capacity utilization to over 85 percent capacity utilization and contribute more than 5 percent on this route during the weekday a.m. peak hour, with implementation of mitigation the proposed project or project variant would be consistent with Policy 11.3 that requires developers to address transit concerns. Mitigation Measure M-TR-4: Monitor and Provide Fair-Share Contribution to Improve 43 Masonic Capacity to improve transit service and minimize effects of traffic on transit includes methods encouraged by Policy 14.2 (transit signal priority), Policy 14.4 (transit-only lanes), and Policy 14.7 (transit boarding improvements). With implementation of this mitigation measure, the proposed project or project variant would be consistent overall with the Transportation Element. See Section 4.C, Transportation and Circulation, for a more detailed discussion of transportation impacts.

Air Quality Element

The general plan includes the 1997 Air Quality Element, which focuses on adherence to regulatory air quality standards and the reduction of air pollution. Objectives applicable to the proposed project or project variant are provided in Section 4.E, Air Quality, p. 4.E.24-4.E.25. Implementation of the proposed project or project variant would not obviously conflict with the Air Quality Element. See Section 4.E, Air Quality, for a more detailed discussion of air quality impacts.

Environmental Protection Element

The Environmental Protection Element addresses the impact of urbanization on the natural environment. It pertains to the protection of plant and animal life; air, water, and noise pollution; conservation and management of energy; and reduction of hazardous materials use. As explained in initial study Topic E.12, Biological Resources, pp. 197-204, the project site does not contain suitable habitat for protected plant or animal species. Therefore, the proposed project or project variant would not obviously conflict with provisions of the element related to protection of plant and animal life. Air pollution issues are addressed in the discussion of the Air Quality Element, above.

Section 4.D, Noise and Vibration, pp. 4.D.19-4.D.22, describes operational noise-related objectives and policies applicable to the proposed project or project variant, including policies for avoiding or mitigating transportation noise and includes guidelines for determining the compatibility of land uses with noise levels. Policy 11.1 of the Environmental Protection Element of the general plan includes a land use compatibility chart for community noise exposure to provide a guideline that determines development compatibility within a given noise environment. The City's land use compatibility chart is presented in Table 4.D.7: San Francisco Land Use Compatibility Chart for Community Noise, p. 4.D.20. As discussed under Impact NO-3, p. 4.D.58, operation of the proposed project or project variant would not permanently expose persons to noise levels in excess of standards in the general plan. Therefore, the proposed project or project variant would be compatible within the noise environment, and implementation of the proposed project or project variant would not obviously conflict with the noise provisions of the Environmental Protection Element.

Objective 13 of the Environmental Protection Element encourages energy efficiency in municipal buildings and in existing and new housing. Objective 16 promotes the use of renewable energy. Energy conservation is discussed in initial study Topics E.8, Greenhouse Gas Emissions, and E.16, Mineral and Energy Resources (pp. 146-150 and 240-246). As explained there, energy conservation features would be included in the proposed project and project variant to meet state and local goals for greenhouse gas emission reductions and improved energy efficiency. In addition, the proposed project and project variant both include installation of solar energy facilities. The proposed project or project variant would not obviously conflict with the provisions of the Environmental Protection Element related to conservation and management of energy. Similarly, reduction in use of hazardous materials, management of hazardous materials in accordance with applicable regulations, and emergency response are discussed in Topic E.15, Hazards and Hazardous Materials, pp. 227-240. The proposed project or project variant would use small amounts of common household hazardous materials for routine purposes, and would not obviously conflict with the provisions of the Environmental Protection Element related to reduction of hazardous materials use and interference with emergency response plans (Objectives 19, 21 and 22).

B. SAN FRANCISCO PLANNING CODE

The San Francisco Planning Code (planning code), which incorporates by reference the City's zoning maps, governs permitted uses, densities, and the configuration of buildings within San Francisco. Permits to construct new buildings (or to alter or demolish existing ones) may not be issued unless the proposed project complies with the planning code, an exception or variance is granted pursuant to the provisions of the planning code, or legislative amendments to the planning code are included and adopted as part of the proposed project.

PRIORITY POLICIES

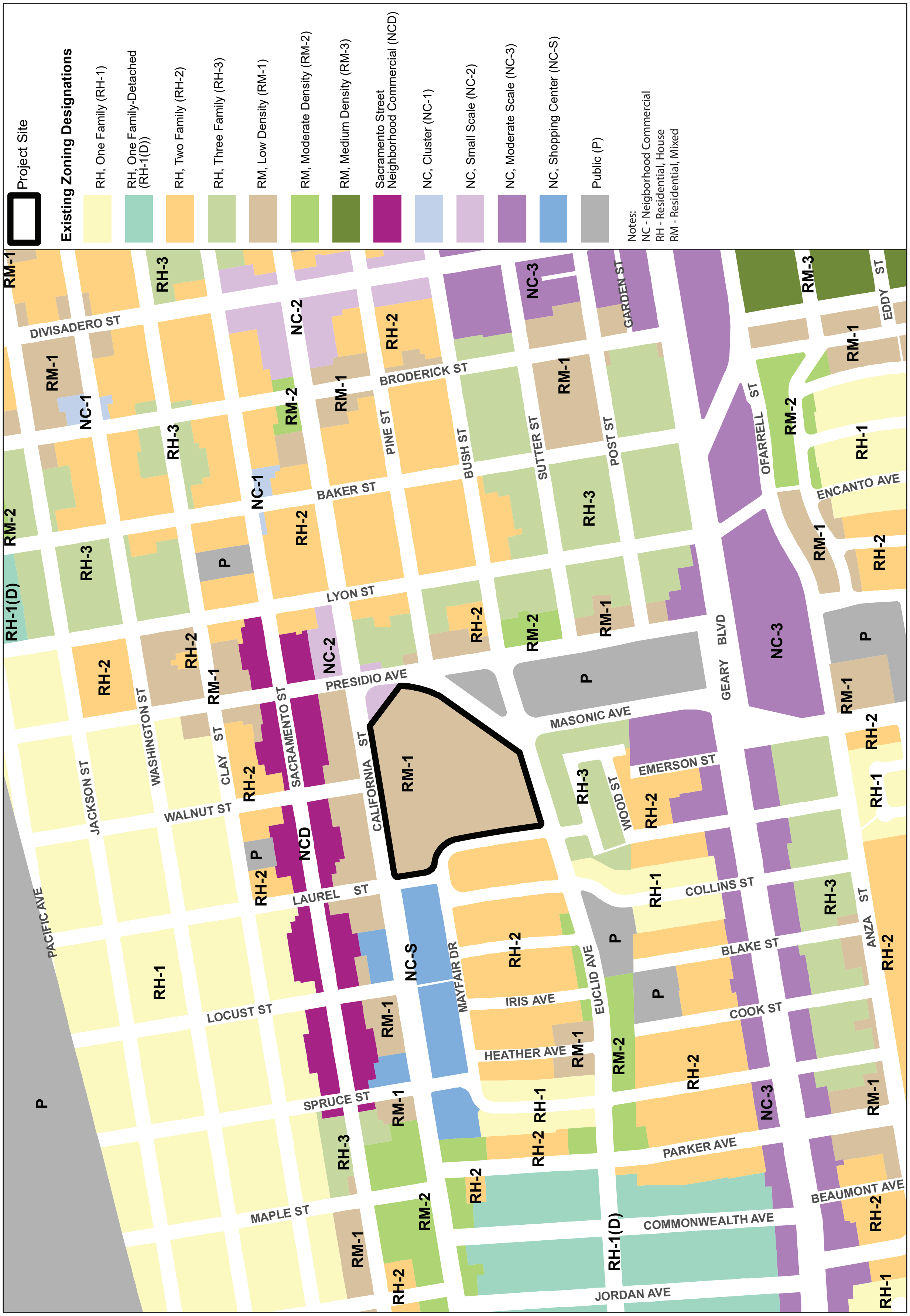
Planning Code section 101.1 establishes priority policies, which are also included in the preamble to the general plan, and this section is generally applicable to the proposed project and project variant. It requires that the City find that the proposed project or project variant on balance is consistent with eight priority policies. These policies are further discussed under "The Accountable Planning Initiative," below.

ZONING

As shown in Figure 3.1: Zoning Districts, the project site is located within an RM-1 (Residential Mixed, Low Density) District. As described in planning code section 209.2 for RM-1 Districts specifically,

> RM-1 Districts: Low Density. These Districts contain a mixture of the dwelling types found in RH Districts, but in addition have a significant number of apartment buildings that broaden the range of unit sizes and the variety of structures. A pattern of 25-foot to 35-foot building widths is retained, however, and structures rarely exceed 40 feet in height. The overall density of units remains low, buildings are moderately scaled and segmented, and units or groups of units have separate entrances. Outdoor space tends to be available at ground and upper levels regardless of the age and form of structures. Shopping facilities and transit lines may be found within a short distance of these districts. Nonresidential uses are often present to provide for the needs of residents.

Under the RM-1 zoning, office uses are generally not permitted. Because the existing office building and the associated annex building were lawfully constructed and occupied prior to the enactment of the RM-1 zoning in 1978, the existing office use within the project site is a legal, non-conforming use. Under the proposed project, the proposed office use in the Walnut Building, because it would be new construction, would not conform to the RM-1 zoning. (Under the project variant, the Walnut Building would not include any office uses.)



Source: P/SKS (2017)

3333 CALIFORNIA STREET MIXED-USE PROJECT

2015-014028ENV

FIGURE 3.1: ZONING DISTRICTS

Under the RM-1 zoning child care facilities are principally permitted. Under the RM-1 zoning and a planned unit development pursuant to planning code section 304(d)(5), commercial uses are limited to those that are necessary to serve residents of the immediate vicinity, subject to limitations for Neighborhood Commercial Cluster Districts (NC-1) Districts in planning code section 710. Proposed retail uses in the Plaza A, Plaza B, Walnut, and Euclid buildings, beyond those necessary to serve residents of the immediate vicinity, would not conform to the planning code.

The RM-1 District allows a residential density of one unit per 800 square feet of lot area (558 units for the 446,490-square-foot project site). The proposed project, at 558 residential units, would conform to the allowable residential density for the project site. The project variant, at 744 units, would exceed the RM-1 residential density for the project site but would be allowable with a conditional use authorization/planned unit development, under planning code section 304(d)(4), which permits up to one dwelling unit per 600 square feet of lot area (minus one unit).

HEIGHT AND BULK DISTRICTS

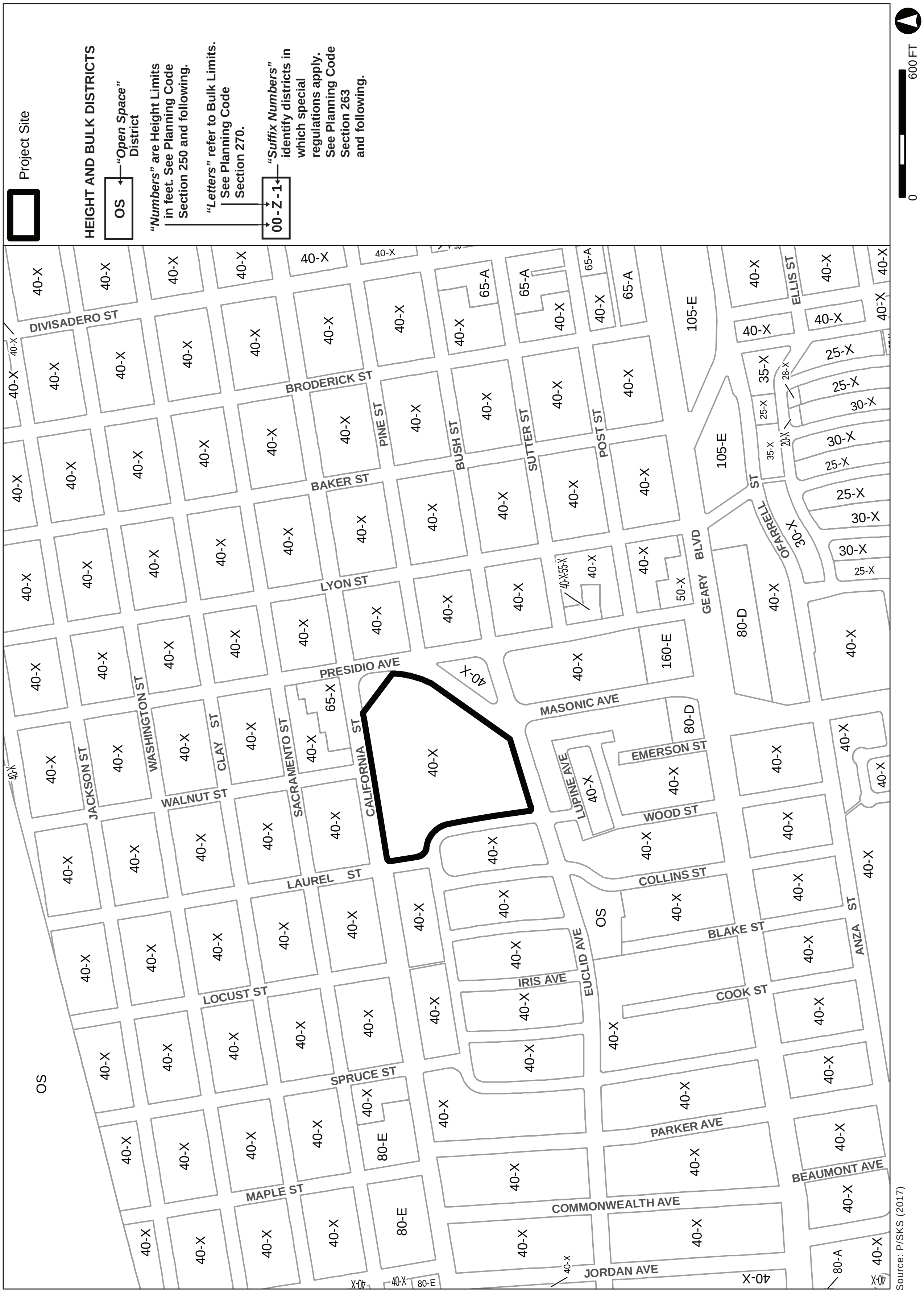
As shown in Figure 3.2: Height and Bulk Districts, the project site is also located within a 40-X Height and Bulk District, which limits the maximum allowable height on the site to 40 feet. An “X” bulk designation permits structures to cover the entire lot, without setbacks, up to the permitted height limit (subject to floor area ratio and other controls).

The existing office building is approximately 55.5 feet tall, as measured along the north elevation, to the top of the roof (exclusive of the approximately 13-foot-tall mechanical penthouse). As such, the existing office building is a non-conforming structure with respect to height but does not conflict with the existing “X” bulk designation.

The proposed project or project variant would require a modification to the existing 40-X Height and Bulk District to allow for the proposed 45-foot-tall buildings along California Street (Plaza A, Plaza B and Walnut buildings), and to allow for the 67-foot-tall Walnut Building along California Street under the variant.

The proposed project or project variant would also require a modification to the existing 40-X Height and Bulk District to allow for the proposed vertical additions to the existing nonconforming office building (to become Center Building A and Center Building B under the proposed project) that would increase its height from 55.5 feet to 80 and 92 feet, respectively.

The rest of the proposed buildings within the project site (Mayfair Building, Laurel Duplexes, Euclid Building, and Masonic Building) would conform to the existing 40-X Height and Bulk District.



3333 CALIFORNIA STREET MIXED-USE PROJECT

FIGURE 3.2: HEIGHT AND BULK DISTRICTS

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PROPOSED SPECIAL USE DISTRICT

As discussed in Chapter 2, Project Description, the project proposes to establish a new Special Use District (SUD) with respect to the project site. The SUD would require a recommendation by the planning commission and approval by the board of supervisors, including approval of zoning map amendments to modify allowable heights at the project site and to establish the boundaries of the SUD. In addition, the project sponsor would seek approval of a conditional use authorization/planned unit development to permit development of buildings in excess of 50 feet in height, to provide for additional dwelling unit density (project variant only), and to provide for minor deviations from the provisions for measurement of height. With adoption of the proposed SUD and the ordinance amending the zoning map, height map, and special use district map, the proposed project or project variant would be consistent with the planning code and applicable maps.

Planning code exceptions to open space requirements, dwelling unit exposure, and rear yard setback requirements applicable within the RM-1 Zoning District would also be sought through the conditional use authorization/planned unit development process. With respect to these exceptions, no conflict with land use plans and policies would occur as no planning code or general plan amendment would be required for these.

Zoning maps would be amended to reflect the proposed SUD and changes to the current height and bulk district (40-X) to the proposed designations.

PLANNING COMMISSION RESOLUTION 4109

As discussed on p. 3.10, the project site is subject to Resolution 4109, adopted in 1952, which allowed the property to be redeveloped as an office campus use pursuant to the Commercial District Zoning controls that were then applicable to the project site. Resolution 4109 contains additional conditions applicable to the existing development of the property for commercial uses as an office campus (including restrictions on the size of the commercial buildings; a requirement for one parking space per 500 square feet of commercial space; and a requirement that there be no large commercial buildings within 100 feet of Euclid Avenue and 100 feet of Laurel Street/Mayfair Drive).

Resolution 4109 also contains conditions applicable to development of residential buildings on the property (including restrictions on residential buildings within 100 feet of Euclid Avenue and 100 feet of Laurel Street/Mayfair Drive; restrictions limiting residential buildings to one- to two-family unit buildings no more than 40 feet in height on parcels no less than 3,300 square feet in size with 50 percent or less site coverage along Laurel Street and Euclid Avenue; requirements that there be a minimum distance of 12 feet between adjacent units, and a minimum setback distance of 10 feet from Laurel Street; and a requirement that there be no residential building on other portions of the subject property with a ground coverage in excess of 50 percent of the area allotted to the building).

The proposed redevelopment of the project site under the proposed project or project variant would not conform to Resolution 4109 conditions imposed on the project site in order to construct the existing office campus. A board of supervisors action to either modify or waive the requirements of Resolution 4109 would be needed, which the project sponsor would seek as part of the creation of the special use district applicable to the project site.

AFFORDABLE HOUSING

The proposed project or project variant would meet the requirements of the City's Residential Inclusionary Affordable Housing Program (planning code sections 415 et seq.), which requires projects of 10 or more residential units to contribute to the creation of affordable housing. The project sponsor is coordinating with City staff to ensure that the residential uses under the proposed project or project variant (558 or 744 residential units, respectively) would contribute the percentage(s) of affordable housing units required by the planning code.

The Accountable Planning Initiative

In November 1986, the voters of San Francisco approved Proposition M, the Accountable Planning Initiative, which added section 101.1 to the planning code and established eight priority policies. These policies are (1) preservation and enhancement of neighborhood-serving retail uses and future opportunities for resident employment in and ownership of such businesses; (2) conservation and protection of existing housing and neighborhood character to preserve the cultural and economic diversity of neighborhoods; (3) preservation and enhancement of affordable housing; (4) discouragement of commuter automobiles that impede Muni transit service or that overburden streets or neighborhood parking; (5) protection of industrial and service land uses from commercial office development and enhancement of resident employment and business ownership; (6) maximization of earthquake preparedness; (7) preservation of landmarks and historic buildings; and (8) protection of parks and open space and their access to sunlight and vistas.

As discussed under "Environmental Setting" in Section 4.B, Historic Architectural Resources, p. 4.B.2-4.B.30, the Midcentury Modern-designed corporate campus within the project site has been determined eligible for inclusion in the National Register of Historical Resources and has been listed on the California Register of Historical Resources under Criterion A/1 (Events) and Criterion C/3 (Architecture/Design/Construction). As such, the property is considered a "historical resource" for the purposes of CEQA. The demolition and new construction under the proposed project or project variant would alter the existing character of the site, and could impair the characteristics of the historic resource that justify its inclusion in the California Register. The proposed project or project variant may therefore be inconsistent with priority policy 7, preservation of landmarks and historic buildings.

Prior to issuing a permit approving any demolition, conversion, or change of use, and any action that requires a finding of consistency with the general plan, the City must find that the proposed project would be consistent with the priority policies, on balance. The staff reports and approval motions prepared for the decision-makers will include a comprehensive project analysis and findings regarding the consistency of the proposed project or project variant with the Priority Policies.

C. OTHER LOCAL PLANS AND POLICIES

In addition to the general plan and the planning code, other local plans and policies that are relevant to the proposed project are as follows:

- The *San Francisco Sustainability Plan*, which is a blueprint for achieving long-term environmental sustainability by addressing specific environmental issues including, but not limited to, air quality, climate change, energy, ozone depletion, and transportation. The goal of the *San Francisco Sustainability Plan* is to enable the people of San Francisco to meet their present needs without sacrificing the ability of future generations to meet their own needs.
- The *Climate Action Plan for San Francisco: Local Actions to Reduce Greenhouse Emissions*, which is a local action plan that examines the causes of global climate change and the human activities that contribute to global warming, provides projections of climate change impacts on California and San Francisco based on recent scientific reports, presents estimates of San Francisco's baseline greenhouse gas emissions inventory and reduction targets, and describes recommended actions for reducing the City's greenhouse gas emissions.
- The *Transit-First Policy* (City Charter, section 8A.115), a set of principles that underscore the City's commitment to give priority to traveling by transit, bicycle, and on foot over traveling by private automobile. These principles are embodied in the objectives and policies of the Transportation Element of the *General Plan*. All City boards, commissions, and departments are required by law to implement Transit First principles in conducting the City's affairs.
- The *San Francisco Bicycle Plan*, a citywide bicycle transportation plan that identifies short-term, long-term, and other minor improvements to San Francisco's bicycle route network. The overall goal of the *San Francisco Bicycle Plan* is to make bicycling an integral part of daily life in San Francisco.
- The *San Francisco Better Streets Plan*, which consists of illustrative typologies, standards, and guidelines for the design of San Francisco's pedestrian environment, with the central focus of enhancing the livability of the City's streets.
- The *Transportation Sustainability Program*, which calls for improved investment in transportation infrastructure, alignment of the City's environmental review processes with City policies, and adopting new practices supporting a shift in travel from single-occupant vehicles to other, more space-efficient modes of travel. The first component

enacted a transportation sustainability fee for investment in the transportation network to help offset the effects of growth. The second component involved adoption of a resolution to eliminate automobile delay as a significant impact on the environment and replaced it with a vehicle miles traveled (VMT) threshold for all CEQA environmental determinations going forward. The third component involved implementing a Transportation Demand Management Ordinance, which requires new developments to incorporate "design features, incentives, and tools" to reduce VMT, and requires monitoring and reporting to the planning department to demonstrate compliance.

- *Vision Zero*, which is a policy to eliminate all traffic deaths in San Francisco by the year 2024. The goal of Vision Zero is also to reduce severe injury inequities across neighborhoods, transportation modes, and populations. Vision Zero has been adopted by both the San Francisco Board of Supervisors and the San Francisco Municipal Transportation Agency. Some actions the San Francisco Municipal Transportation Agency has taken and will take to improve pedestrian safety include safer signal timing at intersections, adding "continental" crosswalks (crosswalks with zebra striping), "leading" pedestrian signals that allow pedestrians to get a head start at signalized intersections, red zones at intersections to improve visibility, and pedestrian bulbs to shorten pedestrian crossing distances.

The proposed project and project variant have been reviewed against these local plans and policies and would not obviously or substantially conflict with them.

D. REGIONAL PLANS AND POLICIES

In addition to local plans and policies, there are several regional planning agencies whose environmental, land use, and transportation plans and policies consider the growth and development of the nine-county San Francisco Bay Area. Some of these plans and policies are advisory, and some include specific goals and provisions that must be adhered to when evaluating a project under CEQA. The regional plans and policies that are relevant to the proposed project or project variant are as follows:

- *Plan Bay Area*, which was prepared by the Association of Bay Area Governments (ABAG) and the Metropolitan Transportation Commission (MTC), and includes the Regional Transportation Plan and Sustainable Communities Strategy for the San Francisco Bay Area. *Plan Bay Area* is a long-range integrated land use and transportation plan for the nine-county Bay Area that covers the period from 2010 to 2040. *Plan Bay Area* calls for concentrating housing and job growth around transit corridors, particularly within areas identified by local jurisdictions as Priority Development Areas.[1] Plan Bay Area 2040 is a limited and focused update of the region's previous integrated transportation and land use plan adopted in 2013.

[1] As described under initial study Topic E.2, Population and Housing, pp. 112-123, the project site is not located within a Priority Development Area; however, the proposed project or project variant would be consistent with ABAG priority development area goals and criteria; i.e., it is located on an infill site, is served by existing transit, and is in an area containing a mix of moderate density housing, services, retail, employment, and civic or cultural uses.

In addition, *Plan Bay Area* specifies strategies and investments for maintaining, managing, and improving the region's multi-modal transportation network and proposes transportation projects and programs to be implemented with reasonably anticipated revenue. *Plan Bay Area* also provides a list of transportation projects for highway, transit, rail, and related uses through 2040 for the nine Bay Area counties. *Plan Bay Area* was adopted on July 26, 2017, and will be updated every four years.

- ABAG's *Projections 2013*, which is an advisory policy document that includes population and employment forecasts to assist in the development of local and regional plans and policy documents.
- The Bay Area Air Quality Management District's *Bay Area 2017 Clean Air Plan*, which updated the 2010 Clean Air Plan, in accordance with the requirements of the California Clean Air Act, to implement feasible measures to reduce ozone and provide a control strategy to reduce ozone, particulate matter, air toxics, and greenhouse gases throughout the region.
- The Regional Water Quality Control Board's *Water Quality Control Plan for the San Francisco Bay Basin*, which is a master water quality control planning document. It designates beneficial uses and water quality objectives for waters of the state, including surface waters and groundwater, and includes implementation programs to achieve water quality objectives.

The proposed project and project variant have been reviewed against these regional plans and policies. Due to the limited size and nature of the proposed project and project variant, neither would obviously or substantially conflict with any of the above plans or policies.

4. ENVIRONMENTAL SETTING AND IMPACTS

A. INTRODUCTION

Chapter 4, Environmental Setting and Impacts, addresses the physical environmental effects of the proposed project. This introduction to Chapter 4 presents the general format of the environmental analysis in each environmental topic section. It provides a general description of the approach to the project's analysis of environmental impacts, including reasonably foreseeable future projects that are considered in the cumulative impact analyses. This section also describes the existing environmental conditions of the project area.

The San Francisco Planning Department (planning department) distributed a Notice of Preparation (NOP) of an EIR and Notice of Public Scoping Meeting on September 20, 2017, announcing its intent to prepare an EIR and to solicit comments from the public about the scope of this EIR (the NOP is presented as Appendix A to this EIR). The planning department subsequently published a Notice of Availability of an Initial Study and an initial study on the 3333 California Street Mixed-Use Project on April 25, 2018 (the initial study is presented as Appendix B to this EIR). The initial study determined that project-specific and cumulative impacts in certain topic areas would have no impact, less-than-significant impacts, or less-than-significant impacts with mitigation included in the proposed project or project variant, and therefore would not require analysis in this EIR. The topics of Land Use and Planning (all topics), Population and Housing (all topics), Cultural Resources (archaeological resources, human remains, tribal cultural resources), Transportation (aviation-related topics), Noise (aviation-related topics), Air Quality (odors), Greenhouse Gas Emissions (all topics), Wind and Shadow (all topics), Recreation (all topics), Utilities and Service Systems (all topics), Public Services (all topics), Biological Resources (all topics), Geology and Soils (all topics), Hydrology and Water Quality (all topics), Hazards and Hazardous Materials (all topics), Mineral and Energy Resources (all topics), and Agricultural and Forest Resources (all topics) are not discussed further in the EIR. Please refer to the initial study (EIR Appendix B) for a discussion of these topics.

The initial study determined that the proposed project or project variant could result in potentially significant impacts in the following topic areas: Cultural Resources (historic architectural resources only), Transportation and Circulation (all topics except aviation-related ones), Noise (all topics except aviation-related ones), and Air Quality (all topics except odors). These topics are analyzed in this chapter. The initial study determined that project-specific and cumulative impacts in all other topic areas would have no impact, less-than-significant impacts, or less-than-significant impacts with mitigation, and therefore would not require analysis in this EIR. Although the initial study determined that Land Use and Planning impacts would be less than significant and would thus not require further analysis in the EIR, the land use setting is discussed in this section for informational purposes only to orient the reader. In addition, written comments received on the initial study expressed concerns on a number of environmental topics, most of which were raised in comments on the NOP and at the public scoping meeting and are addressed in the initial study or in the EIR. However, certain comments on environmental topics discussed in the initial study, as well as issues identified by the planning department, resulted in a decision to provide additional information in the EIR. Section 4.F, Initial Study Supplement, provides additional information regarding compliance with regulatory requirements associated with hazards and hazardous materials (Topic E.15 of the initial study), clarifies information from the San Francisco Unified School District related to demand forecasts and the potential need for new public school facilities (Topic E.11, Public Services, of the initial study), and discusses minor updates to supporting documentation for the energy assessment (Topic E.16, Minerals and Energy Resources, of the initial study).

FORMAT OF THE ENVIRONMENTAL ANALYSIS

Each environmental topic considered in this chapter comprises three main subsections: Environmental Setting, Regulatory Framework, and Impacts and Mitigation Measures.

ENVIRONMENTAL SETTING

The Environmental Setting subsection describes the existing conditions at the project site and in the project site vicinity. As provided in the CEQA Guidelines section 15125(a), existing conditions are generally defined as the physical environmental conditions that exist at the time a notice of preparation is published, or if no notice of preparation is published, at the time the environmental analysis is commenced. Thus, the existing conditions for the proposed project and project variant are those at the time the Notice of Preparation was published on September 20, 2017. Existing conditions serve as the baseline for the analysis of environmental impacts (adverse physical changes) that could result from implementation of the proposed project or project variant, presented under the Impacts and Mitigation Measures subsection that follows for each topic.

REGULATORY FRAMEWORK

The Regulatory Framework subsection describes the relevant federal, state, and local regulatory requirements that are directly applicable to the environmental topic being analyzed.

IMPACTS AND MITIGATION MEASURES

The Impacts and Mitigation Measures subsection describes the physical environmental impacts (i.e., the changes to baseline physical environmental conditions) that could result from implementation of the proposed project or project variant, as well as any mitigation measures that could avoid, eliminate, or reduce identified significant impacts. This subsection begins with a listing of the significance criteria that have been developed by the planning department for use in determining whether an impact is significant. A “Project Features” discussion summarizes the particular aspects of the proposed project and project variant that are relevant to each topic. Environmental topic sections also include an "Approach to Analysis" subsection. This discussion explains the parameters, assumptions, and data used in the analysis.

Under the "Impact Evaluation" discussion, the project-level impact analysis for each topic begins with an impact statement that reflects one or more of the applicable significance criteria. Some significance criteria may be combined in a single impact statement, if appropriate. Each impact statement is keyed to a subject area abbreviation (e.g., TR for Transportation and Circulation) and an impact number (e.g., 1, 2, 3) for a combined alpha-numeric code (e.g., Impact TR-1, Impact TR-2, etc.).

When potentially significant impacts are identified, mitigation measures are presented that would avoid, eliminate, or reduce significant adverse impacts of the project. All mitigation measures will be required as conditions of project approval. Each mitigation measure corresponds to the impact statement and has an "M" in front to signify it is a mitigation measure (e.g., Mitigation Measure M-TR-1 for a mitigation measure that corresponds to Impact TR-1). If there is more than one mitigation measure for the same impact statement, the mitigation measures are numbered with a lowercase letter suffix (e.g., Mitigation Measures M-TR-1a and M-TR-1b).

Improvement measures are recommended actions, agreed to by the project sponsor, which would reduce or avoid impacts found to be less than significant. Identification of improvement measures is not required under CEQA, but they are often presented in San Francisco environmental documents to inform decision-makers of additional actions that could improve the proposed project by reducing the magnitude of less-than-significant effects. Improvement measures are designated with an "I" to signify "improvement measure," the topic code, and a letter (e.g., I-TR-A, I-TR-B, etc.).

Each impact statement describes the impact that would occur without mitigation. The level of significance of the impact is indicated in parentheses at the end of the impact statement based on the following terms:

- No Impact – No adverse physical changes (or impacts) to the environment are expected.
- Less Than Significant – Impact that would not exceed the defined significance criteria or would be eliminated or reduced to a less-than-significant level through compliance with existing local, state, and federal laws and regulations.
- Less Than Significant with Mitigation – Impact that is reduced to a less-than-significant level through implementation of the identified mitigation measures.
- Significant and Unavoidable with Mitigation – Impact that exceeds the defined significance criteria and cannot be reduced to less-than-significant levels through compliance with existing local, state, and federal laws and regulations and/or implementation of all feasible mitigation measures.

- Significant and Unavoidable – Impact that exceeds the defined significance criteria and cannot be eliminated or reduced to a less-than-significant level through compliance with existing local, state, and federal laws and regulations and for which there are no feasible mitigation measures.

APPROACH TO ANALYSIS

This EIR analyzes the physical environmental impacts associated with implementation of the proposed project or the project variant. The analysis includes consideration of environmental impacts associated with both construction and operation of the proposed project or project variant, as appropriate for the particular topic.

AESTHETICS AND PARKING ANALYSIS

Public Resources Code section 21099(d), effective January 1, 2014, provides that "aesthetics and parking impacts of a residential, mixed-use residential, or employment center project on an infill site located within a transit priority area shall not be considered significant impacts on the environment." Accordingly, aesthetics and parking are not considered in determining if a project has the potential to result in significant environmental effects for projects that meet all of the following three criteria:

1) The project is in a transit priority area; and
2) The project is on an infill site; and
3) The project is residential, mixed-use residential, or an employment center.

The proposed project or project variant meet each of the above three criteria, and thus this EIR does not consider aesthetics and the adequacy of parking in determining the significance of project impacts under CEQA.[1]

Public Resources Code section 21099(e) states that a Lead Agency maintains the authority to consider aesthetic impacts pursuant to local design review ordinances or other discretionary powers and that aesthetics impacts do not include impacts on historical or cultural resources. As such, there is no change in the planning department's methodology related to design and historic review.

The planning department recognizes that the public and decision-makers nonetheless may be interested in information pertaining to the aesthetic effects of a proposed project and may desire that such information be provided as part of the environmental review process. Therefore, some of the information that would have otherwise been provided in an aesthetics section of an initial study or EIR (such as "before" and "after" visual simulations) has been included Chapter 2, Project Description, pp. 2.27-2.33. However, this information is provided solely for informational

[1] San Francisco Planning Department, *Eligibility Checklist: CEQA Section 21099 – Modernization of Transportation Analysis*, 3333 California Street, December 18, 2017.

purposes and is not used to determine the significance of the environmental impacts of the project, pursuant to CEQA.

In addition, CEQA section 21099(d)(2) states that a Lead Agency maintains the authority to consider aesthetic impacts pursuant to local design review ordinances or other discretionary powers and that aesthetics impacts do not include impacts on historical or cultural resources.

AUTOMOBILE DELAY AND VEHICLE MILES TRAVELED ANALYSIS

CEQA section 21099(b)(1) requires that the Governor's Office of Planning and Research develop revisions to the CEQA Guidelines establishing criteria for determining the significance of transportation impacts of projects that "promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses." CEQA Guidelines section 21099(b)(2) states that, upon certification of the revised guidelines for determining transportation impacts pursuant to CEQA Guidelines section 21099(b)(1), automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment under CEQA.

In January 2016, the Office of Planning and Research published for public review and comment a *Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA*[2] with a draft recommendation that transportation impacts for projects (especially auto delay) be measured using a vehicle miles traveled (VMT) metric, rather than a Level of Service (LOS) metric. On March 3, 2016, in anticipation of the future certification of the revised CEQA Guidelines, the San Francisco Planning Commission adopted a resolution (consistent with the Office of Planning and Research's recommendation) to use a VMT metric instead of automobile delay (as measured by LOS) to evaluate the transportation impacts of projects (Resolution 19579). (Note: The VMT metric does not apply to the analysis of impacts on non-automobile modes of travel such as riding transit, walking, and bicycling.)

Accordingly, neither the initial study (EIR Appendix B) nor this EIR contains a discussion of automobile delay impacts. Instead, a VMT and induced automobile travel impact analysis is provided in the Transportation and Circulation analysis in the EIR. The topic of automobile delay, nonetheless, may be considered by decision-makers, independent of the environmental review process, as part of their decision to approve, modify, or disapprove the proposed project or project variant.

2 Governor's Office of Planning and Research, *Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA*, January 20, 2016, http://www.opr.ca.gov/docs/Revised_VMT_CEQA_Guidelines_Proposal_January_20_2016.pdf, accessed April 9, 2018.

APPROACH TO CUMULATIVE ANALYSIS

The CEQA Guidelines require that an EIR discuss cumulative impacts of a project. CEQA Guidelines section 15355 defines cumulative impacts in the following way:

> "Cumulative Impacts" refers to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts. The individual effects may be changes resulting from a single project or number of separate projects. The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time.

The discussion of cumulative impacts should reflect the severity of impact and their likelihood of occurrence, but the discussion need not provide as great detail as is provided for effects attributable to the project alone (CEQA Guidelines section 15130 (b)). It should be guided by the standards of practicality and reasonableness and should focus on the cumulative impacts to which the identified other projects contribute, rather than the attributes of other projects which do not contribute to the cumulative impact.

This EIR discusses the cumulative impacts analyzed for each environmental topic and the proposed project's or project variant's contribution to these cumulative impacts, if any. Two approaches to a cumulative impact analysis are provided in CEQA Guidelines section 15130(b)(1): (a) the analysis can be based on a list of past, present, and reasonably foreseeable future projects producing closely related impacts that could combine with those of a project; or (b) a summary of projections contained in a general plan or related planning document can be used to determine cumulative impacts. A list-based approach refers to "a list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside of the control of the agency" (CEQA Guidelines section 15130(b)(1)(A)). A projections-based approach refers to "a summary of projections contained in an adopted local, regional or statewide plan, or related planning document, that describes or evaluates conditions contributing to the cumulative effect. Such plans may include: a general plan, regional transportation plan, or plans for the reduction of greenhouse gas emissions" (CEQA Guidelines section 15130(b)(1)(B)).

The analysis of cumulative impacts in this EIR uses a combination of the two approaches. The projections-based approach is used, and augmented where applicable with the list-based approach, because there are other past, present, and reasonably foreseeable future projects in the project vicinity (typically defined as a quarter-mile radius around project site) that, when combined with the proposed project or project variant, could result in cumulative effects. The transportation analysis relies on a citywide growth projection model that also encompasses many individual development and transportation projects anticipated in the project vicinity. The projections model includes many of the larger, individual projects listed below and applies a quantitative growth factor to account for other growth that may occur in the area.

The analysis of cumulative impacts involves the following steps: determining the cumulative context or geographic scope and location of the cumulative projects relative to the affected resource's setting; assessing the potential for project impacts to combine with those of other projects, including the consideration of the nature of the impacts and the timing and duration of implementation of the proposed and cumulative projects; determining the significance of the cumulative impact; and assessing whether the project's contribution to a significant cumulative effect is considerable. CEQA does not prescribe the use of one specific approach to analyzing cumulative impacts. The rationale used to determine an appropriate list of projects considered in an individual project's cumulative analysis is explained in the discussion of cumulative impacts for each environmental topic in this EIR.

Cumulative impacts are presented in a separate subsection following each topic's project-level impact analysis. Cumulative impact statements are numbered consecutively with a combined alpha-numeric code that starts with "C" to signify it as a cumulative impact. For example, C-TR-1 refers to the first cumulative impact for Transportation and Circulation.

Projects Included in Cumulative Conditions Scenario

The cumulative conditions scenario considers past, present, and reasonably foreseeable projects within a quarter-mile radius of the project site. These projects are listed below and shown in Figure 4.A.1: Cumulative Projects, p. 4.A.12.

3700 California Street (Case No. 2017-003559ENV): The 213,733-square-foot project site spans 14 parcels on three blocks bounded by California Street to the south, Arguello Boulevard to the west, Sacramento Street to the north, and Spruce Street to the east in the Presidio Heights neighborhood. The project site contains seven buildings with hospital, medical office, and parking uses, and one nine-unit residential building at 401 Cherry Street. The project would demolish five buildings and retain and renovate the 401 Cherry Street residential building and the three-story medical building (former Marshall Hale Hospital) at 3698 California Street. The Marshall Hale building is proposed to become a 24-unit residential building. Thirty-one new residential buildings, consisting of 14 single-family homes and 17 multi-family buildings, ranging in height from three to seven stories (36 to 80 feet), would be constructed. In total, the project site would result in 33 buildings containing 273 dwelling units (9 existing and 264 new); 416 vehicle parking spaces; 433 bicycle parking spaces; and approximately 86,200 square feet of private and common open space. To accommodate the construction of the new buildings, the project would require excavation of approximately 61,800 cubic yards of soil to a maximum depth of 75 feet. There would be approximately 24,363 cubic yards of debris removal related to the demolition of existing structures on the project site.[3,4] This project is under environmental review.

- **726 Presidio Avenue (Case No. 2014-001576ENV):** This project would result in the demolition of an existing three-story multi-family residential building with three residential units and the construction of a four-story multi-family residential building with a below-grade basement level for parking and seven residential units. Environmental review has been completed.
- **2670 Geary Boulevard (Case No. 2014-002181ENV):** This project would result in the demolition of an existing one-story restaurant and construction of an 8-story mixed-use building with 95 residential dwelling units above approximately 1,800 square feet of ground-floor commercial space and 16 off-street parking spaces. Environmental review has been completed.
- **2675 Geary Boulevard (Case No. 2015-007917ENV):** This project proposes several new additions and buildings at the City Center Shopping Mall at Masonic Avenue and Geary Boulevard. One- and two-story horizontal additions to the existing two-story retail building would be constructed in parking lot D, totaling approximately 7,530 square feet. A new two-story retail building would be constructed in parking lot F, totaling approximately 22,072 square feet, and a new one-story retail building would be constructed on the northeast corner of Masonic Avenue and O'Farrell Street in parking lot A, totaling approximately 3,608 square feet. To expand parking lot B, an elevated parking deck would be constructed above parking lot A and the proposed new retail building at the corner of Masonic Avenue and O'Farrell Street. The additions would replace 57 parking spaces and increase the retail square footage on the property from 206,897 to 224,017 square feet, an increase of 17,120 square feet. Environmental review has been completed and this project is under construction.

In addition to the projects identified above, the following transportation infrastructure and streetscape plan projects are typically considered part of the cumulative setting:

- **California Laurel Village Improvement Project:**[5] This project, a joint effort between the San Francisco Municipal Transportation Agency (SFMTA) and Public Works, will implement measures to improve safety, enhance the pedestrian environment, and improve Muni travel time. Improvements include adding gateway plazas at the southwest corner of California and Laurel streets, at the midblock (California and Locust streets), and at southeast corner of California and Spruce streets; replacing sidewalks; adding landscaping, new lighting, street furniture, transit bulbouts, and code-compliant curb ramps; and relocating bus stops. Implementation of this project will also result in the repaving of California Street between Cherry and Laurel streets.[6] In addition, the

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3 San Francisco Planning Department, Notice of Preparation of an Environmental Impact Report, 3700 California Street, September 19, 2018 (Case No. 2017-003559ENV), http://sfmea.sfplanning.org/NOP_9.19.18_web.pdf, accessed October 15, 2018.

4 Michael Keinath, Ramboll, e-mail correspondence with Debra Dwyer, Principal Planner, San Francisco Planning Department, September 25, 2018.

5 San Francisco Public Works, California Laurel Village Improvement Project, http://sfpublicworks.org/laurel-village, accessed July 17, 2018.

6 Dustin White, Transportation Planner, San Francisco Municipal Transportation Agency, e-mail correspondence with Lana Russell-Hurd, Transportation Planner, San Francisco Planning Department, October 18, 2017.

construction of transit bulbouts at the northwest and southwest corners of the California Street/Jordan Avenue/Cherry Street intersection will be implemented as part of this project and will be coordinated with the proposed redevelopment of the CPMC California Campus, discussed above. Transit-related changes are coordinated with Muni Forward, described below. The project is under construction and expected to be complete in November 2018.

- **Laurel Heights/Jordan Park Traffic Calming Project:**[7] This is a phased SFMTA project that will implement traffic calming measures at various locations in the Laurel Heights/Jordan Park neighborhoods to slow traffic and improve safety and to discourage cut-through traffic. This project builds on previous traffic calming efforts in the southwestern portion of the Jordan Park neighborhood south of Euclid Avenue along Palm, Commonwealth, Jordan, and Parker avenues. The project area is roughly bounded by California Street to the north; Laurel Street, Euclid Avenue, and Masonic Avenue to the east; Geary Boulevard and Euclid Avenue (west of Spruce Street) to the south, and Spruce Street and Arguello Boulevard to the west.

  Most improvements have already been implemented as part of the first two phases of this project, with the remaining improvements to be implemented primarily along Euclid Avenue. The final phase of construction (Phase 3) was completed in March 2018. The Phase 3 improvements included the addition of speed humps on Euclid Avenue between Arguello Boulevard/Palm Avenue, Palm and Jordan avenues, and Iris and Manzanita avenues; two landscaped traffic circles at Euclid and Parker avenues and at Euclid Avenue/Collins Street; 10 landscaped traffic islands on Euclid Avenue at Spruce Street, Heather Street, Iris Street, Manzanita Street and Laurel Street; a channelizing island at Euclid Avenue/Laurel Street; and a 2-foot buffer to the existing bicycle lane.[8] In May/June 2018, after completion of a traffic operations evaluation of the new traffic circles along Euclid Avenue, the SFMTA installed 'Yield to Pedestrian' signs on all four legs of each intersection where traffic circles were constructed.

- **Muni Forward (formerly the Transit Effectiveness Project):**[9] This is a joint effort between the SFMTA, the planning department, and the controller's office to maximize Muni service delivery. The objectives of Muni Forward are to improve service reliability, reduce transit travel time, enhance customer experiences, and improve service effectiveness and efficiency. Muni Forward is comprised of four major categories: a service policy framework, service improvements, service-related capital projects, and travel time reduction proposals.

  Muni Forward changes along California Street between the intersections of California and Laurel streets and of California Street/Jordan Avenue/Cherry Street have been integrated with the California Laurel Village Improvement Project, described above. In the immediate vicinity of the project site improvements include a transit stop relocation

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[7] SFTMA, Laurel Heights/Jordan Park Traffic Calming Project, https://www.sfmta.com/sites/default/files/projects/Laurel%20Heights-Jordan%20Park%20Final%20Report.pdf, accessed April 9, 2018.

[8] Golier, Patrick, Transportation Planner, San Francisco Municipal Transportation Agency, e-mail correspondence with Debra Dwyer, Principal Environmental Planner, San Francisco Planning Department, October 11, 2017 and January 29, 2018.

[9] San Francisco Planning Department, Transit Effectiveness Project Final EIR, certified March 27, 2014, Case File No. 2011.0558E, http://www.sf-planning.org/index.aspx?page=2970#downloads, accessed March 8, 2018. The California Street corridor was studied programmatically in the TEP EIR, and the SFMTA may apply elements of the transit preferential streets toolkit for other segments of this corridor in the future.

from the southwest side of the California Street/Laurel Street intersection to the southeast side and the construction of an approximately 6-foot-wide and 90-foot-long transit bulbout. On the northeast side of the California Street/Laurel Street intersection, an approximately 6-foot-wide and 80-foot-long transit bulbout will be constructed at the existing bus stop. In order to accommodate the transit bulbouts on the east side of the Laurel Street/California Street intersection, the widths of the east and west travel lanes closest to the curbs will be slightly modified.

Further west along California Street, Muni Forward improvements will include an approximately 26-foot-long eastward and westward expansion of the pedestrian bulbout on the south side of the California Street/Locust Street intersection and traffic signal upgrades; a transit stop relocation from the southwest side of the California Street/Spruce Street intersection to the southeast side, and the construction of an approximately 20-foot-wide and 103-foot-long transit bulbout; a transit stop relocation from the northeast side of the California Street/Spruce Street intersection to the northwest side and the construction of an approximately 6-foot-wide and 93-foot-long transit bulbout; the removal of the bus stop at the northwest corner of the California Street/Maple Street intersection, and the construction of transit bulbouts at the northwest and southwest corners of the intersection of California Street/Jordan Avenue/Cherry Street.[10] As with the proposed improvements for the California Laurel Village Improvement Project, these related Muni Forward improvements are expected to be in place by November 2018.

- **Masonic Avenue Streetscape Project:**[11,12] This is a joint effort between SFMTA, Public Works, and the San Francisco Public Utilities Commission (SFPUC) to improve safety on the stretch of Masonic Avenue between Fell Street and Geary Boulevard. The project includes repaving the street, installing a new dual sewer system[13] and upgraded water distribution system, and removing approximately 167 parking spaces along Masonic Avenue. Removing the on-street parking spaces will create space for wider sidewalks, high-visibility crosswalks, pedestrian bulbouts, pedestrian-scale sidewalk lighting, raised bike lanes, enhanced bus stops, a landscaped center median, new street lighting, new street trees, and landscaping. The project also includes creating a new residential parking permit area and striping new parking spaces along Turk Street between Central Avenue and Baker Street and converting an existing triangular space and one-way roadway at the southwest portion of the Masonic Avenue and Geary Boulevard intersection into a new public plaza. The project was under construction at the time the Notice of Preparation was issued and was completed in September 2018.
- **Geary Bus Rapid Transit Project:** This is a program to improve Muni bus service along Geary Street/Geary Boulevard through the implementation of operational and physical improvements. Operational improvements would consist of designating bus-only lanes to allow buses to travel with fewer impediments, adjusting traffic signal timing to give buses more green lights at intersections, and providing passengers with real-time bus

[10] White, Dustin, Transportation Planner, San Francisco Municipal Transportation Agency, e-mail correspondence with Lana Russell-Hurd, Transportation Planner, San Francisco Planning Department, October 18, 2017.

[11] SFTMA, Masonic Avenue Streetscape Project Fact Sheet, https://www.sfmta.com/projects/masonic-avenue-streetscape-project, accessed April 9, 2018.

[12] San Francisco Public Works, Masonic Avenue Streetscape Project, http://sfpublicworks.org/masonic, accessed April 16, 2018.

[13] Sewer lines will be installed on each side of the street and the sewer line in the middle of Masonic Avenue will be abandoned due to the construction of a landscaped center median.

> arrival and departure information to allow them to manage their time more efficiently. Physical improvements would consist of building high-quality and well-lit transit stations to improve passenger safety and comfort, and providing streetscape improvements and amenities to make the street safer and more comfortable for pedestrians and bicyclists who access the transit stations. The two closest Bus Rapid Transit stations to the project site would be located on Geary Boulevard between Masonic and Presidio avenues. The project is expected to be completed in 2021.

Public Works also has a number of pavement renovation, sewer main replacement, and curb ramp installation projects through the city that are expected to begin in March 2019.[14] In the vicinity of the project site, pavement renovation projects are identified for the segments of Laurel Street between California Street and Mayfair Drive and Euclid and Lupine avenues. The California Laurel Village Improvement Project, including the Muni Forward improvements along the same segment of California Street, Laurel Heights/Jordan Park Traffic Calming Project, and Masonic Avenue Streetscape Project will be completed before construction for the proposed project or project variant begins. Because these sets of projects and the 726 Presidio Avenue project (described on p. 4.A.8) will be complete by the time the proposed project or project variant would be operational, the baseline conditions for the transportation analysis in Section 4.C, Transportation and Circulation, take these projects into account. A baseline plus project conditions transportation analysis more accurately reflects the conditions that would exist at the time the proposed project's or project variant's impacts would occur than an existing plus project transportation analysis would.

These same sets of projects were not considered in the existing (or baseline) conditions for the noise and air quality construction and impact analyses in Section 4.D, Noise and Vibration, and Section 4.E, Air Quality. Although these projects would be completed before construction of the proposed project or project variant begins, they are primarily transportation infrastructure and streetscape projects (with the exception of four net new residential units at 726 Presidio Avenue), and adding them to the baseline would not create a more accurate analysis for the existing plus project noise and air quality analyses; these projects are therefore discussed in the cumulative context. They would not site any stationary sources of criteria air pollutant or toxic air contaminant emissions, and they would generate a small number of vehicle trips (four net new residential units for the 726 Presidio Avenue project). Therefore, they would not combine with the proposed project or project variant to create significant cumulative noise or air quality impacts. The cumulative analyses for noise and air quality focus on the set of development, transportation, and streetscape improvement projects that could contribute to a cumulative impact and that have construction and operation timelines that coincide with those of the proposed project or project variant.

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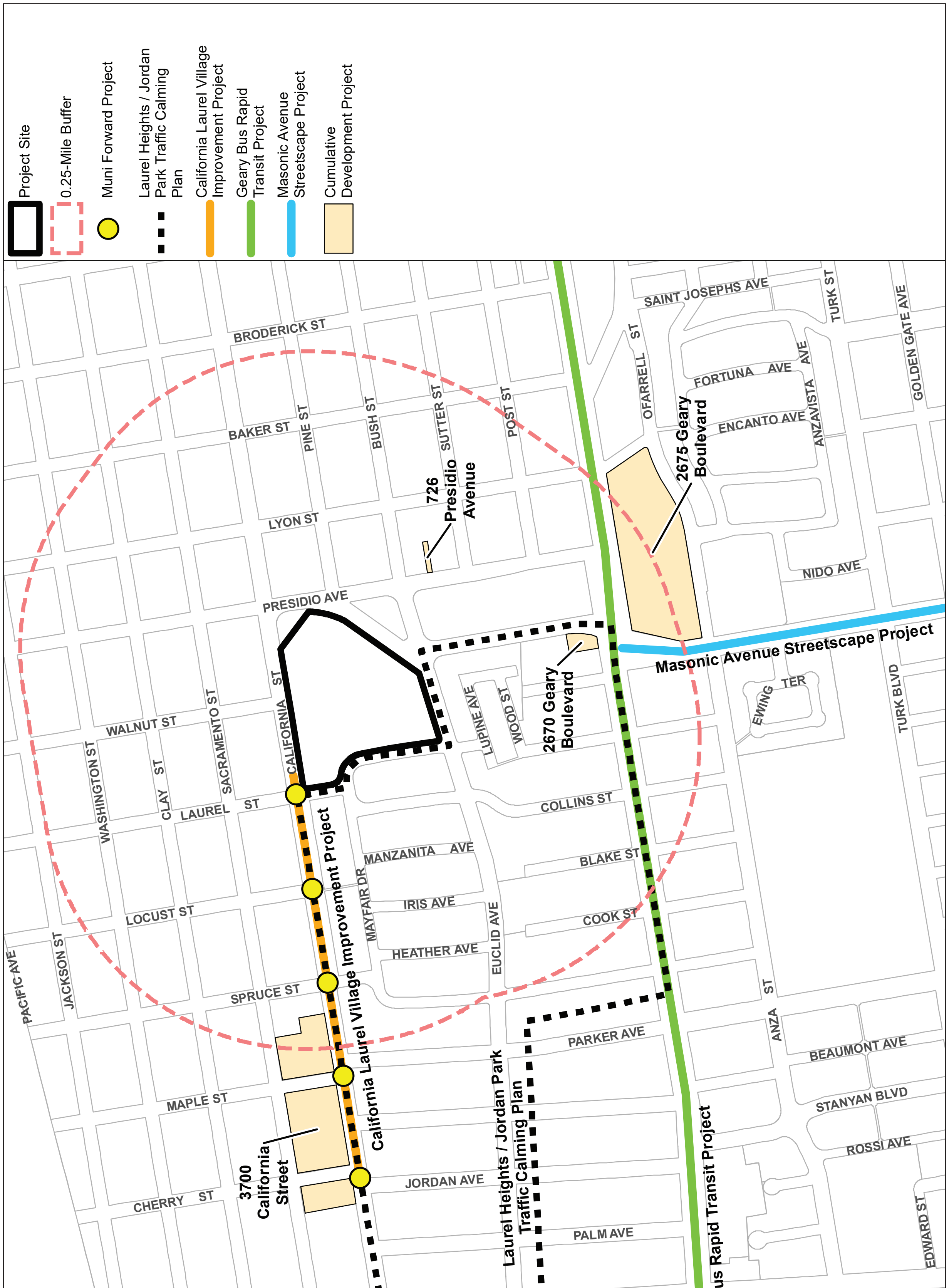
[14] San Francisco Public Works, Notice of Intent and Request for Information and Coordination, Contract No. 2928J, October 12, 2017.



Source: SWCA (2017), City and County of San Francisco

3333 CALIFORNIA STREET MIXED-USE PROJECT

2015-014028ENV

FIGURE 4.A.1: CUMULATIVE PROJECTS

Other active projects in the vicinity of the project site consist of minor modifications to existing residences, such as window replacements, installation of rooftop solar collection systems, and construction of decks. Given their minor scope, they would not combine with the proposed project or project variant in a way that could result in any cumulative impacts; therefore, they are not included in the cumulative context for any topic in this EIR.

LAND USE SETTING

EXISTING SETTING

The project site is located on Lot 003 of Assessor's Block 1032 at 3333 California Street in the Laurel Heights/Jordan Park area of San Francisco's Presidio Heights neighborhood. The approximately 10.25-acre site is adjacent to the Pacific Heights and Western Addition[15] neighborhoods (to the east) and just north of the Anza Vista area of the Inner Richmond neighborhood (see Figure 2.1, p. 2.3). The project site is occupied by the UCSF Laurel Heights Campus and contains two buildings (the existing office and annex buildings), parking (surface and underground) and roadways, and landscaped areas. The two-story building that houses the SF Fire Credit Union, at the southwest corner of California Street and Presidio Avenue, is not part of the project site.

The irregularly shaped 446,490-square-foot lot is bounded by California Street to the north (an approximately 730-foot-long frontage), Presidio Avenue to the east (an approximately 280-foot-long frontage), Masonic Avenue to southeast (an approximately 422-foot-long frontage), Euclid Avenue to the south (an approximately 348-foot-long frontage), and Laurel Street/Mayfair Drive to the west (an approximately 742-foot-long frontage). The project site's topography exhibits a generally southwest-to-northeast-trending downslope, with its high point of 308 feet at the southwest corner (Euclid Avenue and Laurel Street). The site slopes downward to the north and east toward California Street and Presidio Avenue with a grade change of approximately 65 feet. The average slope gradient on the site is approximately 20 percent. However, the slope gradient varies from 5 to 15 percent on the northern portion of the site to greater than 20 percent on its southern portion.

The roadway network surrounding the project site has a generally north-south and east-west grid orientation (see Figure 2.2 in Chapter 2, Project Description, p. 2.4). Adjacent to the project site, California Street has an approximately 85-foot-wide public right-of-way with sidewalks on both sides of the street, Presidio Avenue has an approximately 70-foot-wide public right-of-way with sidewalks on both sides of the street and a class III bicycle facility[16] with sharrows (shared lane markings), Masonic Avenue has an approximately 72-foot-wide public right-of-way with sidewalks on both sides of the street, Euclid Avenue has an approximately 80-foot-wide public

[15] This portion of the Western Addition neighborhood is also referred to as Lower Pacific Heights.
[16] Class III bikeways are signed bike routes.

right-of-way with sidewalks and bicycle lanes on each side of the street, and Laurel Street has an approximately 60-foot-wide public right-of-way[17] with sidewalks on both sides of the street.

LAND USES IN THE PROJECT VICINITY

Residential uses occupy most lots on surrounding blocks to the north, south, east, and west across California Street, Presidio Avenue, Euclid Avenue, and Laurel Street and range from single-story single-family homes to four-story multi-family residential buildings. To the north across California Street are four-story multi-family residential buildings, some of which are senior housing; to the east across Presidio Avenue are two-story multi-family residential buildings; to the south across Euclid Avenue are two- to four-story multi-family residential buildings; and to the west across Laurel Street single-family homes predominate. The single- and multi-family residential uses across Presidio Avenue are constructed in architectural styles typical for the late 19th or early 20th centuries, while those across California Street, Euclid Avenue, and Laurel Street were constructed after World War II. Commercial, retail, public, and institutional uses are intermixed with the low- to mid-rise residential uses. Building heights vary but most are approximately 15 to 45 feet in height, with a few exceptions such as the approximately 65-foot-tall Jewish Community Center of San Francisco (JCCSF) at 3200 California Street, at the northwest corner of California Street and Presidio Avenue.

The majority of the commercial and retail activity is located to the north and west along California and Sacramento streets and includes medical office uses associated with the California Pacific Medical Center (CPMC). The two-block-long Laurel Village commercial corridor, on the south side of California Street and immediately west of the project site across Laurel Street, is comprised of one- and two-story retail spaces fronting California Street served by a surface parking lot at its rear. Services include banking, restaurant, deli, clothing, grocery, and other specialty shops. The Sacramento Street commercial corridor, one block north of the project site, is a shopping area comprised of two- and three-story buildings with specialty stores and neighborhood-serving retail at the ground floor and mostly residential uses in the upper stories. A small-scale neighborhood commercial district is located to the northeast of the project site and includes the SF Fire Credit Union parcel on the southwest corner of California Street and Presidio Avenue, the Laurel Inn at the northeast corner of California Street and Presidio Avenue, and a mixed-use building with residential use over a restaurant and hair salon at the southeast corner of California Street and Presidio Avenue. Across Euclid Avenue, south of the project site, is a Trader Joe's supermarket (about 700 feet away on Masonic Avenue) and the City Center Shopping Mall (about 1,100 feet away on the south side of Geary Boulevard).

Public and institutional uses in the project site vicinity include the JCCSF directly north across California Street and the 4.9-acre, nine-building, multiple-parcel CPMC California Campus

[17] Narrows to a 54-foot-wide public right-of-way at the Mayfair Drive transition.

bounded by Sacramento Street, Spruce Street, California Street, and Cherry Street to the west. The CPMC California Campus includes inpatient and outpatient services, and its most prominent building is the six-story, 91-foot-tall hospital building at 3700 California Street (0.2 mile west of the project site). Other nearby medical uses include the UCSF Psoriasis and Skin Treatment Center (515 Spruce Street near Mayfair Drive), UCSF Medical Center and One Medical (3490 California Street), Pacific Heights Surgery Center (3000 California Street), San Francisco Endoscopy Center LLC (3468 California Street), On Lok Senior Health/Institute on Aging and Golden Gate Dialysis (2700 Geary Boulevard), and Radnet Medical Imaging (3440 California Street).

Across Masonic Avenue and east of the project site is San Francisco Fire Station No. 10 and the San Francisco Fire Department Museum and Safety Learning Center. Across Euclid Avenue, south and east of the project site, are the Presidio Division and Yard, and the recently opened Booker T. Washington Community Center. The Presidio Division and Yard, a San Francisco Municipal Railway (Muni) bus storage and maintenance depot/operator training and administrative center, extends from Geary Boulevard on the south to Euclid Avenue on the north and is bounded on the east and west by Presidio and Masonic avenues, respectively. The southern portion of the Presidio Division and Yard is occupied by a bus repair and administrative office building (two stories at the northern face and three stories at the southern face, and approximately 45 to 50 feet in height). The northern portion of the yard, which is diagonally across Euclid Avenue from the project site, contains a paved parking lot used for bus parking and maintenance. The five-story Booker T. Washington Community Center at 800 Presidio Avenue includes community-serving uses such as a gymnasium, fitness center, child-care and after-school programs, and open space; administrative office uses; and residential uses.

Other uses in the vicinity of the project site include the Presidio Branch Library and Mini-Park at 3150 Sacramento Street (northeast of the project site), several daycare facilities, open spaces, churches, and medical uses. The nearby daycare facilities include the Hellen Diller Family Preschool at the JCCSF,[18] the Laurel Hill Nursery School and Pre-K at 401 Euclid Avenue, and the Chibi Chan Preschool at the Booker T. Washington Community Center.[19] The nearby open spaces include Laurel Hill Playground, near the intersection of Euclid Avenue and Collins Street (about one block west of the project site), and the Presidio Heights Playground, on Clay Street between Walnut and Laurel streets (about two blocks north of the project site). The Bush and Broderick Mini Park is located on Bush Street, between Broderick and Baker streets, about three and a half blocks northeast of the project site. The 1,500-acre Presidio National Park is located about five blocks north of the project site.

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[18] Salgado, Craig, Chief Operating Officer, Jewish Community Center of San Francisco, e-mail correspondence with SWCA Environmental Consultants, October 27, 2017. The preschool serves children under the age of five and has a licensed capacity for 175. Actual enrollment may be greater as not all children are at the center at the same time.

[19] Information available at http://www.jcyc.org/chibichanpreschool.htm, accessed May 25, 2018.

EXISTING ZONING

The project site is located within an RM-1 Zoning District[20] and 40-X Height and Bulk District, which means that permitted uses are primarily residential uses and that the maximum allowable height on the site is 40 feet. Existing uses on the project site are characterized as office uses, and the existing office building is approximately 55.5 feet tall; however, the height varies due to the slope of the site. An X designation for building bulk, such as that applicable to the site, permits structures to cover the entire lot, without setbacks, up to the permitted height limit (subject to floor area ratio[21] and other controls). The uses and the height of the existing structures are nonconforming under the planning code.[22]

Zoning designations in the surrounding area are mainly residential (RH-1, RH-2, RH-3, and RM-l), neighborhood commercial (NCD, NC-S, NC-2, and NC-3), and institutional (P). See Figure 3.1 in Chapter 3, Plans and Policies, p. 3.7, for existing zoning districts. The 40-X Height and Bulk District is the predominant height and bulk district in the project vicinity; however, there are a few exceptions, such as the 65-X Height and Bulk District for the JCCSF (across California Street immediately north of the project site, the 80-E Height and Bulk District for most of the existing CPMC California Campus (to the west of the project site), and 80-D and 160-E Height and Bulk Districts for parcels at the intersection of Geary Boulevard and Masonic Avenue (to the south of the project site). See Figure 3.2, p. 3.9, for existing height and bulk districts.

TRANSIT SERVICE

The project site is located adjacent to and nearby several Muni transit lines. The 1 California, the 1BX California Express,[23] and 2 Clement bus routes run on California Street; the 3 Jackson bus route travels along Presidio Avenue, California Street, and Walnut Street; and the 43 Masonic bus route runs on Presidio Avenue.[24] Outbound Muni bus stops are located at the northwest corner of California Street and Presidio Avenue for the 1 California, 1BX California Express, 2 Clement, 3 Jackson, and 43 Masonic, and at the northeast corners of California and Laurel streets for the

[20] The RM-1 Zoning District is designed to accommodate a mixture of houses and apartment buildings of generally low densities and a variety of building forms and sizes. In addition to residential uses, the RM district also allows residential care facilities, child care facilities, group housing, and religious orders.

[21] Floor area ratio (sometimes called FAR) is the ratio of the sum of the gross floor area of all buildings on a lot to the area of the lot. The existing FAR for the UCSF Laurel Heights Campus Facility (existing office and annex buildings) is approximately 0.8.

[22] A nonconforming structure is a building that complied with regulations when it was constructed but, due to changes to the planning code, fails to comply with current regulations, including height restrictions. In some cases, nonconforming structures are permitted by the planning code to remain indefinitely in their nonconforming status.

[23] The 1BX California Express bus route runs only during AM and PM peak hours only, and only in one direction (inbound AM and outbound PM).

[24] In the vicinity of the project site, the outbound direction for the Muni routes on California Street is west, and for the Muni routes on Presidio Avenue it is south. The inbound direction for routes on California Street is east, and for the Muni routes on Presidio Avenue it is north.

1 California, 1BX California Express, and 2 Clement bus routes. Inbound bus stops are located at the southeast corner of California and Laurel streets[25] and the southwest corner of California Street and Presidio Avenue for the 1 California, 1BX California Express, and 2 Clement bus routes; at the northeast corner of California Street and Presidio Avenue for the 3 Jackson and 43 Masonic bus routes; and at the east side of Walnut Street mid-block between California and Sacramento streets for the 3 Jackson bus route (see Figure 2.2, p. 2.4).

[25] The current bus stop at Laurel and California streets was shifted from the southwest to the southeast corner as part of Muni Forward improvements for transit travel time reduction along California Street. Proposed improvements are being coordinated with the California Laurel Village Improvement Project.

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B. HISTORIC ARCHITECTURAL RESOURCES

Section 4.B, Historic Architectural Resources, assesses project impacts on "historical resources," as defined by CEQA Guidelines section 15064.5.[1] Other cultural resources topics (i.e., archaeological resources, human remains, and tribal cultural resources) were covered in the initial study (see EIR Appendix B, pp. 125-136). CEQA Guidelines section 15064.5(a), in Title 14 of the California Code of Regulations, defines a "historical resource" as:

(1) A resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources.

(2) A resource included in a local register of historical resources, as defined in section 5020.1(k) of the Public Resources Code or identified as significant in an historical resource survey meeting the requirements of section 5024.1(g) of the Public Resources Code, shall be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.

(3) Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the California Register of Historical Resources.

(4) The fact that a resource is not listed in, or determined to be eligible for listing in the California Register of Historical Resources, not included in a local register of historical resources (pursuant to section 5020.1(k) of the Public Resources Code), or identified in an historical resources survey (meeting the criteria in section 5024.1(g) of the Public Resources Code) does not preclude a lead agency from determining that the resource may be an historical resource as defined in Public Resources Code sections 5020.1(j) or 5024.1.

Therefore, under the CEQA Guidelines, even if a resource is not included on any local, state, or federal register, or identified in a qualifying historical resources survey, a lead agency may still determine that any resource is a historical resource for the purposes of CEQA if there is substantial evidence supporting such a determination. A lead agency must consider a resource to be historically significant if it finds that the resource meets the criteria for listing in the California Register of Historical Resources (California Register).

[1] California Code of Regulations, Title 14: Natural Resources, Division 6: Resources Agency, Chapter 3: Guidelines for Implementation of the California Environmental Quality Act, Article 5: Preliminary Review of Projects and Conduct of Initial Study, Section 15064.5: Determining the Significance of Impacts to Archeological and Historical Resources, http://www.parks.ca.gov/pages/1054/files/california%20code%20of%20regulations.pdf, accessed April 18, 2018.

The assessment of a project's impacts on historical resources is a two-step analysis: first, the project site is analyzed to determine if it contains a "historical resource(s)" as defined under CEQA; second, if the site is found to contain historical resources, an analysis is carried out to determine whether the project could cause a substantial adverse change to the resource. A project that may cause a substantial adverse change in the significance of a historical resource is a project that may have significant effect on the environment (Public Resources Code section 21084.1).

ENVIRONMENTAL SETTING

3333 California Street is a Midcentury Modern-designed corporate campus located on a 10.25-acre parcel in the Laurel Heights/Jordan Park neighborhood of San Francisco. Originally constructed in 1956-1957, the campus contains a four-story office building with three levels of partially below-grade parking; a one-story annex building at the northwestern corner of the project site; approximately 2.75 acres of surface parking; and 3 acres of designed landscape or landscaped open space.

The information and analysis in this section are based on Department of Parks and Recreation Primary 523 Forms prepared by Carey & Co., Inc,[2] *Historic Resource Evaluation, Part I* (HRE) prepared by LSA,[3] the National Register of Historic Places (National Register) nomination prepared by Michael Corbett (Architectural Historian) and Denise Bradley (Landscape Historian),[4] and the Historic Resource Evaluation Response (HRER) prepared by the San Francisco Planning Department (planning department).[5] These reports concluded that the project site meets the eligibility criteria for listing in the California Register.

The above-referenced documents provide a historic context for the 3333 California Street property and describe the physical features of the Midcentury Modern-designed corporate campus

[2] Carey & Co., *State of California Department of Parks and Recreation Primary Record and Building, Structure and Object Record – 3333 California Street, the Laurel Heights Building*, July 31, 2010, and Carey & Co., *State of California Department of Parks and Recreation Primary Record and Building, Structure and Object Record – 3333 California Street, the Laurel Heights Annex*, July 31, 2010. The evaluation was prepared at the request of UCSF as part of a facility-wide inventory and was not submitted to the State Historic Preservation Office. (See EIR Appendix C-1.)

[3] LSA, *Historic Resource Evaluation, Part I*, *3333 California Street*, December 2017. (See EIR Appendix C-2.)

[4] Michael Corbett (Architectural Historian) and Denise Bradley (Landscape Historian), *National Register of Historic Places Registration Form for Fireman's Fund Insurance Company Office at 3333 California Street, San Francisco, California*, submitted to California State Historic Preservation Office, April 19, 2018. (See EIR Appendix C-3.)

[5] Justin Greving, Preservation Planner, San Francisco Planning Department, *Historic Resource Evaluation Response (Part 1), Case No. 2015-014028ENV, 3333 California Street*, May 14, 2018. Minor revisions incorporated after consideration of the expert opinions expressed in the National Register Nomination form. (See EIR Appendix C-4.)

as the basis of its evaluation of the property for California Register eligibility. The HRER findings are summarized below.

PROPERTY DESCRIPTION

The project site is located on an irregularly shaped 10.25-acre parcel bounded by California Street to the north (an approximately 730-foot-long frontage), Presidio Avenue to the east (an approximately 280-foot-long frontage), Masonic Avenue to southeast (an approximately 422-foot-long frontage), Euclid Avenue to the south (an approximately 348-foot-long frontage), and Laurel Street/Mayfair Drive to the west (an approximately 742-foot-long frontage). The project site's topography exhibits a generally southwest-to-northeast trending downslope. From its high point of 308 feet San Francisco City Datum[6] at the southwest corner (Euclid Avenue and Laurel Street), the site slopes downward to the north and east toward California Street and Presidio Avenue with a grade change of approximately 65 feet. Approximately 63 percent of the site is covered by buildings or other impermeable surfaces (e.g., internal roadways and surface parking lots) and 37 percent is landscaping or landscaped open space.

Site Plan and Circulation

The project site is bordered along California Street by an approximately 10-foot-tall brick wall with a pedestrian entrance and curb cut for the California Street entrance, where Walnut Street intersects with California Street. The brick wall is set back 5 feet from the north property line, with a planting strip in the setback. The brick wall joins with the one-story annex building at the corner of Laurel and California streets and wraps around the corner to continue south along Laurel Street at the west property line. There is a pedestrian entrance and curb cut for the Mayfair entrance, where Mayfair Drive intersects with Laurel Street, south of which the brick wall is set back behind a formally landscaped, stepped slope and terminates immediately north of the Laurel Street entrance. The existing office building has a brick perimeter wall along its Presidio Avenue and Masonic Avenue frontages, set back at least 36 feet from the east (Masonic Avenue) property line. The eastern portion of the project site has a substantial number of mature trees, landscaping, and open space in this setback area.

The project site has three surface parking lots (331 spaces) on its north and west portions, and a three-level, partially below-grade parking garage (212 spaces) on its northeast corner, for a total of 543 parking spaces. The surface parking lots and the parking garage are connected by an internal roadway system and the circular garage ramp structures north of the existing office building's east wing. Access to the parking lots and garage and an off-street freight loading dock is available from the main entrance on California Street and from access driveways at Mayfair

[6] San Francisco City Datum establishes the City's zero point for surveying purposes at approximately 8.6 feet above the mean sea level established by the 1929 U.S. Geological Survey datum.

Drive, Laurel Street, and Presidio Avenue. Pedestrian access to the campus is provided at California Street, Laurel Street, and Euclid Avenue, and an internal sidewalk system leads to entrances along the office building's north and west façades.

Buildings

The 10.25-acre project site includes two buildings. The 455,000-gross-square-foot office building at the center of the site is four stories tall and includes the 93,000-gross-square-foot, three-level, partially below-grade parking garage. The annex building is a one-story, 14,000-gross-square-foot building located at the northwestern corner of the project site.

The office building was designed in 1955, constructed in 1956-1957, and, between 1964 and 1966, expanded with an additional floor (1964) and a new parking garage constructed under the east wing (1966). The office building has three wings, referred to in the HRE as the California Street wing, which is aligned east-west; the Laurel Street wing, which is aligned north-south; and the Euclid Avenue wing, which is aligned east-west. Due to the site's slope, the existing office building has three partially below-grade floors on the south and east elevations (along Masonic and Presidio avenues) and four above-grade floors on the north and west elevations (along California and Laurel streets). The building is approximately 55.5 feet tall as measured along the north elevation to the top of the roof (exclusive of the approximately 13-foot-tall mechanical penthouse).

The office building rests on a concrete slab and pier foundation and is covered by a flat roof. The building's irregularly shaped footprint and pronounced horizontal profile were designed to fit the site's topography. The primary entrance is located on the north side of the California Street wing. The office building walls are of steel-frame, reinforced concrete or masonry construction and consist of full-length and full-height glass curtain walls topped with a concrete cornice. A typical section of the window system is composed of an upper and lower band of spandrel glass with an alternating pattern of a fixed-pane picture window and a partial sash window, each set in an aluminum frame. Overhanging concrete ledges separate each floor. The use of glass and concrete is interrupted by sections of walls or attached planter boxes clad in V-pointed, running bond masonry.

The interior of the office building includes approximately 362,000 gross square feet of office space used by the University of California, San Francisco (UCSF) administrative, academic research, and social and behavioral science departments, including common areas and space for accessory uses and support programs, such as a conference center/auditorium, a cafeteria, and storage as well as an independently run child care center.

A 14,000-gross-square-foot, one-story annex building is located on the northwest corner of the project site (at the corner of California and Laurel streets). The walls of the annex building are of reinforced concrete construction and fully clad in V-pointed running bond masonry. The north façade faces California Street and is a solid wall. The west façade faces Laurel Street and contains three evenly spaced, horizontal-framed windows containing two metal-framed, opaque wire windows divided by a horizontal muntin.[7] The east façade includes the main entrance, which is located at the far left (south) side of the façade and is accessed via the parking lot northwest of the office building. The main entrance is a replacement single-pane entrance door and full-height sidelight set in an aluminum frame. The east façade also contains a large set of louvered metal vents, likely to facilitate cooling of utility equipment, and the south façade is a solid wall clad in V-pointed running bond masonry.

The annex building houses the boilers, chillers, and water treatment facilities for the existing office building, other plant operations systems, office space for the physical plant engineers, and unused laboratory office space. Shipping and receiving is accessed via a curved asphalt driveway along the south façade that wraps around to a loading dock on the west façade.

Landscaping and Open Space

The project site has partially wooded and landscaped areas along its perimeter. The approximately 195 trees on the site are comprised of 48 different tree species, with New Zealand Christmas, Purple Leaf Plum, Olive, and Monterey Cypress as the most represented tree species, along with some Coast Redwood, Canary Island Pine, English Oak, Atlas Cedar, Monterey Pine, Eucalyptus, Coast Live Oak, and English Yew trees. The project site does not contain any landmark trees, but it does have 19 significant trees as defined in the city’s Urban Forestry Ordinance. Additionally, there are 15 existing street trees along the site’s California Street frontage; the Presidio Avenue, Masonic Avenue, Euclid Avenue, and Laurel Street frontages have no street trees. A number of the mature Monterey Cypress trees on the north portion of the site on the grass lawn near the circular garage ramp structures and at the perimeter of the northwestern surface parking lot may have been young trees when the subject property was purchased by the Fireman’s Fund Insurance Company (FFIC) to build its corporate campus and are likely remnant trees from the Laurel Hill Cemetery landscape.[8]

The project site contains approximately 165,200 square feet of open area, with approximately 51,900 square feet of accessible open space and approximately 113,300 square feet of space in inaccessible planted areas, such as the formally landscaped area at the mid-block of Laurel Street and the steeply sloped and densely-planted area along the southeastern portion of the site. The term “open area” used here does not include the surface parking lots and internal vehicular circulation system. There are also grass lawns at the corners of Euclid Avenue and Laurel Street

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7 A muntin is the element separating and holding panes of glass in a window.

8 LSA, *Historic Resource Evaluation, Part I, Volumes 1 and 2, 3333 California Street,* December 2017. (See EIR Appendix C-2.)

and Presidio and Masonic avenues (approximately 23,600 square feet and 10,700 square feet, respectively). The remaining open space is internal private open space, composed of the landscaped courtyard at the southeast side of the office building (approximately 13,100 square feet), and the outdoor children's play space adjacent to the south side of the office building (approximately 4,500 square feet).

HISTORIC AND ARCHITECTURAL CONTEXT

The project site has been evaluated under the relevant historic and architectural contexts with which the site is associated. The Midcentury Modern-designed corporate campus on the project site is associated with the historic context themes of the development of the Laurel Heights/Jordan Park neighborhood; the FFIC; and the University of California, San Francisco. It is associated with the architectural context themes of the corporate campus development in the United States during the mid-20th century; Midcentury Modern architecture; Midcentury Modern landscape design; architect Edward B. Page; and the landscape architectural firm Eckbo, Royston & Williams. These themes serve as the framework within which the California Register significance criteria are applied to evaluate the eligibility of the campus. An overview of the historic and architectural contexts of the project site is presented below.

Historic Context

The Development of Laurel Heights/Jordan Park Neighborhood

Despite the rapid influx of population beginning with the 1849 Gold Rush, land west of Divisadero Street remained unincorporated until 1868, after which annexation legislation set aside land for parks and settled outstanding land claims. Large areas of undeveloped sand dunes that were relatively close to downtown were soon developed as burial grounds. What would become the Laurel Heights neighborhood was first developed in the 1850's as part of the larger 160-acre Lone Mountain Cemetery, which opened on May 30, 1854. Lone Mountain Cemetery was located on a rise and provided commanding views east toward downtown and west to the Pacific Ocean. The cemetery was the final resting place for San Franciscans of all classes. As demand for cemeteries increased, additional graveyards were established in the vicinity of Lone Mountain, which changed its name around this time to Laurel Hill Cemetery, including Calvary Cemetery (1860), the Masonic Cemetery (1864), and the Independent Order of Odd Fellows Cemetery and its columbarium (1865). Together, these graveyards were known as the "Big Four." The original Laurel Hill Cemetery was 55.4 acres in size and its boundaries were California Street on the north, Presidio Avenue on the east, just north of Geary Boulevard on the south, and Arguello Street on the west. The cemetery site's formerly barren and sandy soil was systematically transformed with ornamental plantings, exotic trees, and 20 miles of paths. With this transformation, the Big Four became popular recreation destinations before Golden Gate Park was established.

Approaching the turn of the 20th century, public attitudes toward cemeteries changed as residential development expanded. The board of supervisors prohibited burials within city limits after August 1, 1901, which effectively stopped sales of plots and burial services for the cemeteries. Predictably, the formerly lush grounds deteriorated, and maintenance and repair of vandalized monuments lapsed.

While three of the Big Four cemeteries soon relocated their graves and prepped for residential development, grave relocation and closure of Laurel Hill Cemetery did not begin until 1939, following protestations by the Native Sons of the Golden West and the Society of California Pioneers. By early 1941, 35,987 graves had been removed and relocated to Cypress Lawn Memorial Park in Colma. Grave relocation stopped during World War II, and Laurel Hill Cemetery was not completely cleared until 1947.

In 1942, the Laurel Hill Cemetery Association sold the entire 55.4-acre cemetery tract to Heyman Brothers, one of the largest land owners and developers of housing in the Sunset District. Heyman Brothers sold a 45-acre portion of the tract to the Mayfair Building Corporation in 1944 for $25,000,000, who constructed the residential subdivision of Laurel Village, west of the project site, in 1948-1950, and the Laurel Village Shopping Center, a collection of 28 commercial buildings built in 1948-1955 fronting California Street between Laurel Street on the east and mid-block between Parker and Spruce streets on the west. The portion of the tract that contains the project site was set aside for a new San Francisco Unified School District high school. However, the land was rezoned for commercial use, and in 1953 the FFIC purchased it and built the Midcentury Modern-designed corporate campus at the project site.

Fireman's Fund Insurance Company

COMPANY HISTORY

Early San Francisco was a boom town composed mostly of wooden structures, which were frequently destroyed by large fires. In 1863, William Holdredge saw an opportunity to provide affordable insurance to motivate volunteer fire fighters to aggressively fight fires. Holdredge created a firemen's retirement fund financed with 10 percent of the annual net profit from insurance premiums. Using the self-interest on the part of firefighters for a stable retirement, Holdredge incentivized aggressive firefighting, which in turn resulted in fewer claims, more revenue, and higher donations to the fund. The new firm was called the FFIC and opened for business May 1, 1863. The company's first office was located at 238 Montgomery Street in downtown San Francisco.

The company grew quickly, moving into the lucrative arena of insuring sailing vessels in 1871. Despite the daunting financial burden resulting from massive urban fires in the 1870s, FFIC survived and remained profitable. By 1885, the company expanded into a neighboring building at 407 California Street and began acquiring subsidiaries, including the Home Mutual Insurance

Company in 1892. By 1900, FFIC had absorbed 11 competitors, which opened new markets in New York, Georgia, Hong Kong, Shanghai, and the Philippines. By the end of 1905, FFIC had 6,000 independent agents, and by January 1906 it was offering the country's first nationwide auto insurance.

In April 1906, an earthquake and fire destroyed much of San Francisco. In the aftermath of the disaster, policyholders filed 8,600 claims covering $11.2 million while the company's assets were less than $7 million. FFIC took policyholders at their word and paid out claims half in cash and half in company stock. After settling earthquake claims, FFIC distributed its remaining assets to stockholders and closed. A new debt-free company, Fireman's Corporation, immediately took its place, and moved into FFIC's reconstructed headquarters at 407 California Street in 1915.

The re-formed company prospered during World War I. In the 1920s, the company began to underwrite film productions, where temporary movie sets of paper, wood, and fabric were a real fire danger. Despite the stock market crash in October 1929 and the subsequent Great Depression, the company retained a high annual income and in 1937 employed 1,500 regular staff and 10,000 agents.

In 1930, FFIC established the Fireman's Fund Indemnity Company to handle casualty business, and insured part of constructing the Golden Gate and San Francisco Bay bridges. The company continued to grow after World War II. By 1955, the company had purchased the National Surety Corporation and operated out of 128 district offices in the United States and Canada, serving over two million policyholders. FFIC was at that time the largest insurance group in the United States with headquarters on the West Coast.

3333 CALIFORNIA STREET HOME OFFICE

In 1956, during this period of strength, FFIC broke ground on a new home office at 3333 California Street. The new headquarters would provide room for new data processing systems designed to streamline operations. FFIC hired architect Edward B. Page, who spent a year studying the business, analyzing work flows within and between various departments, before starting his design for the new headquarters. FFIC also hired the prominent landscape architecture firm of Eckbo, Royston & Williams to design the landscape. FFIC's relocation to a new, modern campus within San Francisco was a move that struck some as unconventional, as many corporations during the postwar period were relocating to San Mateo and Santa Clara counties. FFIC attributed its choice to its long consideration of San Francisco as the company's home. FFIC moved into its completed new headquarters in 1957.

By the late 1970s, the insurance industry as a whole was making large profits and many new competitors entered the market. In response, FFIC and many other established firms cut premiums to retain the market share, which proved an expensive mistake, as profits dropped over

75 percent in one year. In 1982, FFIC began to gradually relocate to the northern Marin County community of Novato, and sold 3333 California Street to the private real estate investment group Chartered Associates of California, Ltd. In 1990, Munich-based Allianz AG Holding, purchased FFIC for $3.3 billion. In 2000, FFIC was Marin County's largest employer, with 2,400 employees. In 2015, FFIC relocated to the Sonoma County community of Petaluma.

Chartered Associates of California, Ltd. intended to repurpose the building and lease it as office and/or administrative space. The group sought to secure long-term leases from variously sized groups, especially to "emphasize its appropriateness for high technology client's administrative use." This new use triggered a shift from a corporate campus to an office park, whereby several smaller independent companies or branch offices would lease office space. The group's first client was FFIC, who leased back 60 percent of the building; this share steadily decreased as the company gradually relocated to Novato. On January 30, 1985, Chartered Associates of California, Ltd. sold 3333 California Street to the Regents of the University of California.

University of California, San Francisco

The University of California began in Oakland in 1853 as the Contra Costa Academy, which was renamed College of California in 1855. On March 23, 1868, the State Legislature merged the College of California's existing faculty, buildings, and land with the new, well-funded, yet rootless public university system to become the University of California (UC). In September 1873, UC relocated to its present campus in Berkeley. That same year, San Francisco-based physician Hugh H. Toland donated his medical college, Toland Medical School, to UC. In 1895, the new college, University of California, San Francisco (UCSF) moved to a 13-acre site on Parnassus Heights donated by San Francisco Mayor Adolph Sutro.

During the early to mid-20th century, UCSF expanded and received generous public support and large government research grants. By 1972 a new hospital, three research towers, and a nursing building had been built on an already crowded campus. Residents in neighborhoods surrounding the campus grew concerned by UCSF's continuous expansion and sued the school, claiming insufficient environmental analysis and CEQA violations. The outcome was a 1976 agreement that capped development at the Parnassus Heights campus. However, UCSF continued to attract faculty, students, and funding, and the UC Regents started to explore expansion to other areas of the city.

As described above, after FFIC left its headquarters at 3333 California Street in 1985, the UC Regents purchased the project site from Chartered Associates of California, Ltd. An additional investment of $30 million in renovations was proposed to provide needed space to take pressure off of the Parnassus Heights campus. However, local residents argued that using toxic chemicals, carcinogens, and radioactive substances was inappropriate in a residential setting. A residential advocacy group sued the UC Regents in San Francisco Superior Court, claiming the

EIR prepared for the UC Laurel Heights Campus did not comply with CEQA. The California Court of Appeal found the EIR inadequate and ordered a 90-day stop to all research and laboratory programs currently underway at Laurel Heights. However, this order was canceled by the California Supreme Court. By this time, the School of Pharmacy, Center of Deafness, Office of Research Affairs, Labor Relations, administrative offices, and satellite offices of UCSF Police and Environmental Health and Safety had already relocated to the Laurel Heights Campus at 3333 California Street.

Following appeal, the California Supreme Court set aside the original EIR and directed UC Regents to stop expansion and to prepare a new EIR. Following completion of the new EIR in 1990, another round of legal action from residential advocacy groups ensued, including an unsuccessful appeal from UC Regents to the California Supreme Court.

As a result of the litigation process, UCSF administrators limited UCSF uses at the Laurel Heights campus to desktop research, administration, a café, parking capacity for 543 vehicles, and an independently run child care center. In 2012, citing a feasibility study that concluded that significant funds would be required to maintain the facility for its 1,200 employees, school officials determined to sell the project site and relocate. The project site was recently purchased by the project sponsor, Laurel Heights Partners, LLC.

Architectural Context

The Corporate Campus

By 1950, with Europe and Japan still reeling from the effects of World War II and pent-up consumer demand after two decades of severe economic depression and wartime rationing, American businesses were anticipating a period of remarkable growth. The nation's cities were also changing, as Americans were relying on personal automobiles for transportation and favoring homes in the less-dense outlying and suburban areas. Mobile and affluent Americans no longer wanted to live and work in cities. Suburban areas, with their decentralized land use patterns that had areas of untouched "green space," strongly attracted Americans seeking to reconnect with a pastoral past.

The corporate campus first appeared in the late 1940s to manage research, attract university scientists, and use a high-minded institutional feel to create a corporate identity. The arrangement of buildings, roads, medians, verges, water features, infrastructure, green spaces, and parking lots was based on the design and layouts of universities. The corporate campus would evoke the feel of a university campus, where the mission is to ponder, research, and collaborate in a quiet, quasi-natural pastoral setting interspersed with stately buildings, which, it was believed, would enable progress. As more Americans went to college, a corporate campus that reminded them of their student days was an effective recruiting tool.

Landscape design played a major role in engineering a pastoral setting and feeling. Landscape architects demonstrated the restrained, functional, logical philosophy of Modernist design. Typical aspects in landscape design included linear tree lines, margins with evergreen ground cover, rectangles of open lawn, and thick plantings of uniformly spaced trees bordering the site. The park idea was reflected in the names given to these campuses, such as “research park,” “executive park,” “industrial park,” “business park,” “office park,” and “technology park.” Companies found that these new settings instilled a pride of place in their employees, and staff turnover dropped.

The emphasis on collaboration, mixing the informality of the academy with the formality of capitalism, and team-oriented thinking was reinforced by an open, flexible interior design and layout. The design of the interior spaces reflected a “systems engineering” approach, where floors would be open and departments logically arranged so those working in related fields could collaborate more easily. The flow and arrangement stressed the restrained, functional, unadorned Modernist design. Glass curtain walls allowed those inside to have a full view of the landscape and vegetation. Glass panels were framed with walls of glazed, colored brick. As the typical campus was located outside a city, land was cheaper and the buildings themselves could be shorter and spread out to cover more area. Elevators were not always required, and architects were free to design elaborate staircases.

The corporate campus significantly changed how the American post-war business community reorganized itself and accommodated itself to the sensibilities of the modern workforce. Many came to believe that a campus-like setting was necessary to realize progress and foster discovery and innovation. In northern California, IBM’s 650-acre Almaden Research Center in a then-rural Santa Clara County was considered the prime example of corporate campus design and philosophy. Today, these property types are found all over the world and continue to merge the worlds of capitalism and research.

Midcentury Modern Architecture

Midcentury Modern is an offshoot of the Modern/International style and has its roots in the rise of industrial manufacturing during the late 19th century. During this period of intense American industrial and commercial growth, a new form of building was needed to house workers in the increasingly dense and expensive downtown commercial core areas. Expanding horizontally was not a viable or affordable option, so the solution was to expand vertically. Practical innovations, including steel-framed superstructures, elevators, forced-air ventilators, and electrical and telephone systems, made this vertical expansion possible.

For architects, the boxed steel frame used in buildings made the use of heavy timbers, stone, or brick no longer necessary. The outer wall now became a veneer, and could be clad with metal, glass, porcelain, or tiles. In the early 20th century, architects grew to embrace the minimally decorated façade and remove historically sourced symbols and motifs from their commercial buildings. This shift also paralleled the embrace of the machine age, which favored a sleeker, more refined appearance. By the 1920s, an unparalleled period of Wall Street-driven prosperity found its architectural expression in the Art Deco, with zigzags, sunbursts, rich colors, and materials set in dramatic angles. Following the stock market crash of 1929 and the Great Depression of the 1930s, designers stripped away Art Deco's rich materials and ornamentation to emphasize smooth, clean lines, reflecting a hope held by many that science and technology would rejuvenate the economy. When applied to architecture, this subdued design aesthetic was known as Streamline Moderne, and set the stage for the rapid adoption and expansion of Modern architecture following World War II.

The 1930s set the stage for the Modern/International-styled design of European architects Mies van der Rohe and Le Corbusier. These and other architects applied existing construction principles to create buildings that required no load bearing exterior walls. Bricks and stone were replaced with sheets of glass or metal. This style found widespread favor in post-war American society and spread to all major cities and outlying areas. The style had economic advantages, as buildings had a simple design, devoid of elaborate ornamentation, that was easily replicated.

Midcentury Modern grew out of the Modern movement and reflected the emerging philosophy of indoor-outdoor living in sunny post-war California. Midcentury Modern's minimalist design aesthetic began in pre-war Scandinavia, and stressed clean lines, open floor plans with few interior walls, natural materials such as wood, stone and brick, minimal decoration or clutter, and functional design. The use of patios, pergolas, and interior courtyards created welcoming, shaded transition areas where the inside and outside merged.

The popularity of Midcentury Modern coincided with one of the longest stretches of economic prosperity in American history. In San Francisco, Midcentury Modern was most frequently applied to residential design, as the design of a minimalist container facilitated indoor-outdoor living and reduced material and labor costs for contractors and developers. The style is seen in housing tracts in San Francisco including Clarendon Heights, Diamond Heights, Midtown Terrace, Lakeshore Park, Twin Peaks, and eastern Bernal Heights.

Although residential architecture was the main vehicle for Midcentury Modern design, architects also applied it to civic buildings, union hiring halls and offices, commercial properties, recreation centers, and churches.

Midcentury Modern Landscape Design

Midcentury Modern's concept of indoor/outdoor living was embraced by landscape architects. Working together with architects, landscape architects created outdoor areas that were meant to be actively used rather than passively enjoyed as decorative scenery. The use of plants to structure an outdoor space became popular. Rather than creating gardens of many exotic plants, Modernist landscape architects preferred to design using a narrow variety of plants to create space or volume. Modern art was a source of inspiration, as asymmetry, irregular layouts, and cubist forms were translated onto the landscape.

Post-war landscape architects moved from designing individual residential projects to master planning larger projects, including college and university campuses, civic squares, and regional planning. In the San Francisco Bay Area, through efforts by professional landscape architectural organizations such as Telesis, a specific vision of a regional Bay Area design emerged. Telesis consisted of young, college-educated professionals who, through a shared experience in various New Deal work programs, believed that good design, based on education and scientific methods, could better society. They called for architects, landscape architects, planners, designers, and others to collaborate in regional planning. The efforts of Telesis were cut short by World War II, but its ideas re-emerged to influence post-war planning in San Francisco and the Bay Area.

Modernist landscape property types in San Francisco include private residential gardens, large-scale residential complexes, rooftop gardens, civic and institutional landscapes, and commercial and corporate landscapes. Most of San Francisco's corporate landscapes are located in the downtown area, and, due to limitations in available space, these landscapes are small and built around a small plaza or park, a pedestrian bridge over a water feature, or a detached building set within a park. Common design elements in Midcentury Modern landscape designs as applied to corporate landscapes include lighting features, benches and seating areas, grassy areas, signage, trees, walkways and pedestrian circulation, planters, fountains, and sculpture.

Architect Edward B. Page

Edward Bradford Page was a San Francisco-based architect who lived and worked in the Marin County communities of Bolinas and Sausalito. He designed buildings locally in the early to mid-20th century. Page was born in Alameda on December 27, 1905. He was the son of Charles Page, who served as FFIC's Chairman of the Board as well as a San Francisco City Fire Commissioner, and chairman of the Northern California War Finance Committee during World War II. Page graduated from Yale University's Sheffield Scientific School in 1930 and attained a Bachelor of Fine Arts in Architecture from Yale University's School of Fine Arts in 1932. In 1937, he was back in the Bay Area and took a job as a draftsman for the Golden Gate International Exposition. He also worked as a draftsman for several San Francisco-based architectural firms.

Following military service in World War II, Edward Page opened his own architectural firm, and became a member of the American Institute of Architects in 1949. By the 1960s, in addition to the subject property, Page had designed a housing project and two schools in San Francisco, and a private residence in the Marin County community of Belvedere which resulted in an American

Institute of Architects Award of Merit. In 1968, Page dissolved his firm and formed the San Francisco architectural firm of Page, Clowdsley & Baleix with John Upton Clowdsley and John Baleix. Edward Page died in 1996.

Edward Page is generally associated with the Modern architectural conventions, rather than any particular style, and is not included among other, more notable architects who designed buildings in the mid-20th century. In addition to the subject property, some examples of Page's designs include the Mason B. Wells House at 105 Acacia Avenue in Belvedere, Tiburon (1955, extant); a four-story parking garage containing 2,700 stalls constructed at San Francisco International Airport, designed as the first phase of the main terminal parking garage and considered at the time to be the "world's largest" (1964-1965, substantially altered by subsequent phases of construction); a remodeling of the airport's Central Terminal (1963, since demolished); a Fireman's Fund building in Fresno (1964, status unknown); and the Stanford Faculty Club at 439 Lagunita Drive in Stanford (1965, extant).

Landscape Architects Eckbo, Royston & Williams

Garrett Eckbo was born in New York in 1910 and moved to Alameda, California, in 1912. He attended the University of California, Berkeley and studied Landscape Design and Floriculture. After graduation in 1935, Eckbo moved south to Ontario, outside of Los Angeles, and learned about southern California plants. In 1939 Eckbo took a job with the Farm Security Administration and designed migrant-worker camps in California and other western states. During World War II he designed landscapes for defense housing projects in the Bay Area.

Through his education and work experience, Eckbo began to connect landscape design, architecture, and art to develop his style and approach to organizing space. He was part of an emerging school of landscape architecture interested in flexibility and mobility, and making design more fluid and adaptable.

After World War II, Eckbo founded the landscape architecture firm Eckbo, Royston & Williams, with Robert Royston, who had also studied landscape design at University of California, Berkeley, and Edward Williams, his brother-in-law and a fellow student at UC Berkeley. In 1946, Eckbo moved to Los Angeles to head up projects in southern California and, from 1948 to 1956, teach landscape architecture at the University of Southern California. Eckbo published numerous influential books on landscape design during the 1950s and 1960s, including Landscape for Living (1950), The Art of Home Landscaping (1956), Urban Landscape Design (1964), and The Landscape We See (1969).

When Eckbo moved to Los Angeles, Robert Royston remained in northern California and managed the high volume of work related to the post-war housing boom. Most of the workload was low-density suburban tracts, although he soon expanded to also design parks, plazas, and planned residential communities, often in collaboration with notable architects. His site plans emphasized the integration of indoor and outdoor space and elegant, functional garden rooms.

Eckbo, Royston & Williams dissolved in 1958, and Eckbo formed a new firm with Edward Williams and Donald Austin, which became EDAW. Eckbo returned to the San Francisco Bay Area in 1963 and taught Landscape Architecture at the University of California, Berkeley, eventually becoming Department Chair in 1965. He served in that capacity until 1969 and retired in 1978 as Professor Emeritus.

After leaving on amicable terms with Eckbo and Williams in 1958, Robert Royston formed a new firm with Asa Hanamoto. The firm developed into Royston, Hanamoto, Alley, and Abey, which is still in existence today. Eckbo gradually transitioned out of design work and explored more theoretical design applications and concepts. His work was acclaimed by clients and emulated by landscape architects nationwide. Edward Williams died in 1984; Garett Eckbo died in 2000; and Robert Royston died in 2008.

Between 1945 and the 1960s, Eckbo, Royston & Williams designed 19 landscapes for large, institutional properties similar to 3333 California Street, including landscapes for colleges, universities, civic centers, parks, and large housing developments. Many of these projects are located in southern California. One of the projects identified through archival research, St. Mary's Square, is located in San Francisco.

The underlying design approach that Eckbo, Royston & Williams used to arrange small and large landscapes for various clients is described in the San Francisco Modern Architecture and Landscape Design, 1935-1970 – Historic Context Statement:

> They [Eckbo, Royston & Williams] don't look upon gardens, parks and playgrounds as things in themselves attached to houses or communities of houses. To them, the house and garden is interrelated living area, some of which is enclosed by walls and roofs, some of which is open. Since they don't design houses they believe in close collaboration with the architect at all stages of the development of the house so that the living spaces which include both indoor and outdoor spaces are properly arranged with respect to each other as well as wind, views and sun.[9]

As applied to the project site, the firm oriented courtyard areas to face the south or east and be sheltered by the massing of the office building from cool, and often foggy, onshore winds. Arranging outdoor seating areas in this way provided visitors with warm places to sit. These seating areas combine informality with precision. The layouts are informal clusters of seating

[9] Mary Brown, San Francisco Planning Department, *San Francisco Modern Architecture and Landscape Design 1935 – 1970 Historic Context Statement*, February 2011, p. 147, http://commissions.sfplanning.org/hpcpackets/2011.0059U.pdf, accessed March 18, 2018.

areas (benches, tables, built-in seating) linked by pathways yet contained by a system of retaining walls consisting of geometrically arranged, square-shaped brick-clad raised planters.

The firm's underlying principle to integrate the indoor/outdoor approach by mixing the informality of the indoor/outdoor California aesthetic with geometric exactness is echoed by the design of the south-facing interior courtyard, the west-facing seating area, and the terraced plantings along Laurel Street. While the firm designed many larger, more elaborate landscapes for public and private clients, the designed area contained in the Midcentury Modern-designed corporate campus within the project site is an example of design adaptation into a more confined space.

HISTORIC RESOURCE EVALUATIONS OF THE PROJECT SITE

State of California Historical Landmark

The 10.25-acre project site is located on a portion of the 55.4-acre site of California Registered Historical Landmark No. 760, Former Site of Laurel Hill Cemetery. As outlined in California Public Resources Code section 5031(a), California Registered Historical Landmark Nos. 770 and above are automatically listed in the California Register, and California Registered Historical Landmark Nos. 769 and lower are not automatically listed in the California Register, because they are not presumed to have been evaluated using the evaluative framework currently required for California Register eligibility. Therefore, although the project site and surrounding areas are part of a California Registered Historical Landmark, because the landmark number is below 770, the Former Site of the Laurel Hill Cemetery is not listed in the California Register. Impacts related to discovery of archaeological resources and human remains related to the Laurel Hill Cemetery are discussed in the initial study (see EIR Appendix B, Topic E.3, Cultural Resources, pp. 125-135). Development of archaeological testing and monitoring programs, training and communication protocols for construction personnel, development of interpretive programs, and other elements of the mitigation measures would all be approved by the planning department and would reduce the impacts of the proposed project or project variant to a less-than-significant level.

Previous Evaluation by UCSF

In 2010, the office building and annex building were individually evaluated by a qualified expert for their eligibility for the National and California registers, and recorded using State of California Department of Parks and Recreation Primary (A) and Building, Structure, and Object (B) Records.[10] These evaluations were commissioned by UCSF for informational purposes, and the completed records were not filed with California Historical Resources Information System or the planning department. The evaluation determined that the office building was eligible for listing in the National and California registers under Criterion A/1 and under Criterion C/3. The office building was assigned the National Register status code of 3S, indicating that it appears eligible for listing in the National Register as an individual property through survey evaluation. The annex building was found not eligible for listing in either the National or California registers.

Historic Resource Evaluation

LSA, a planning department-approved historic architectural resources consultant, completed a Historic Resource Evaluation (HRE) for the project site in December 2017 consisting of a significance evaluation according to California Register eligibility criteria. The analysis was conducted at the direction of the planning department in connection with the CEQA evaluation and in accordance with an approved scope of work.

The HRE applied the California Register eligibility criteria and determined that the Midcentury Modern-designed corporate campus within the project site appears eligible under Criterion 1 as a unique adaptation of a suburban corporate property type, and under Criterion 3 for its uniform Midcentury Modern architectural qualities and designed landscape. The HRE determined that the Midcentury Modern-designed corporate campus within the project site retains sufficient integrity to convey its historic significance.

National Register of Historic Places Registration Form

Laurel Heights Improvements Association commissioned historians Michael Corbett and Denise Bradley to prepare a National Register registration form for 3333 California Street. The National Register registration form for 3333 California Street was submitted to the California State Office of Historic Preservation for review and comment on February 9, 2018. The National Register

[10] Carey & Co., *State of California Department of Parks and Recreation Primary Record and Building, Structure and Object Record – 3333 California Street, the Laurel Heights Building*, July 31, 2010, and Carey & Co., *State of California Department of Parks and Recreation Primary Record and Building, Structure and Object Record – 3333 California Street, the Laurel Heights Annex*, July 31, 2010. The evaluation was prepared at the request of UCSF as part of a facility-wide inventory and was not submitted to the State Historic Preservation Office. (See EIR Appendix C-1.)

registration form was updated on April 19, 2018.[11] The National Register registration form concludes that the property is eligible for listing in the National Register under Criterion A (Events) because of its association with the San Francisco insurance industry and the FFIC, and as an urban adaptation of a suburban property type. The National Register registration form also concludes that the property is eligible for listing under Criterion C (Architecture/Design/Construction) as the embodiment of Midcentury Modern design principles, and as the work of three masters: the architect Edward B. Page, the engineering firm of John J. Gould & H.J. Degenkolb/Henry J. Degenkolb & Associates, and the landscape architectural firm of Eckbo, Royston, & Williams (ERW)/Eckbo, Dean, Austin, and Williams (EDAW).

The planning department is recognized as a certified local government and conducts review for the State Office of Historic Preservation. In response to a March 15, 2018 request from the California State Office of Historic Preservation, the city reviewed the National Register registration form, prepared a staff response, conducted a duly noticed public hearing in front of the Historic Preservation Commission on May 16, 2018, and submitted comments along with a recommendation for the nomination of 3333 California Street to the National Register of Historic Places.[12] At the May 17, 2018, quarterly meeting of the California State Historical Resources Commission, the Commissioners unanimously determined that the property at 3333 California Street is eligible for listing in the National Register and that the nomination be forwarded to the Keeper of the National Register by the State Historic Preservation Officer.[13] Public notice to solicit comments was published in the Federal Register on July 9 and comments were accepted until July 24. On August 29, 2018, the property was determined eligible for listing in the National Register, and, as a result, was listed in the California Register; however, its listing in the National Register must be done with consent of the property owner.[14]

PLANNING DEPARTMENT CALIFORNIA REGISTER ELIGIBILITY DETERMINATION

The planning department, in its Historic Resource Evaluation Response (HRER), has reviewed and considered the State of California Department of Parks and Recreation Records, the HRE,

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[11] Michael Corbett (Architectural Historian) and Denise Bradley (Landscape Historian), *National Register of Historic Places Registration Form for Fireman's Fund Insurance Company Office at 3333 California Street, San Francisco, California*, submitted to California State Historic Preservation Office, April 19, 2018. (See EIR Appendix C-3.)

[12] San Francisco Planning Department, Tim Frye, Historic Preservation Officer to the City and County of San Francisco Historic Preservation Commission, 3333 California Street National Register Nomination Certified Local Government Review, May 16, 2018.

[13] California State Historical Resources Commission, Summary of Quarterly Meeting on May 17, 2018, Julianne Polanco, State Historic Preservation Officer, February 2, 2018 draft.

[14] California Department of Parks and Recreation, Office of Historic Preservation, Julianne Polanco, State Historic Preservation Officer, September 24, 2018.

and the National Register nomination and made the following determinations regarding the eligibility of 3333 California Street for listing in the California Register.

CRITERION 1 (EVENTS)

3333 California Street is eligible for individual listing in the California Register under Criterion 1 (Events) for its association with the broad pattern of development in San Francisco as a corporate campus adapted to an urban environment. The subject property represents an important and new approach to corporate office planning as a unique adaptation of the suburban corporate campus property type.

CRITERION 2 (PERSONS)

The subject property does not appear eligible for listing in the California Register under Criterion 2. No persons associated with the property, FFIC, or the UCSF Laurel Heights Campus have been identified that appear to make notable contributions to local or state history on this site such that it would be individually eligible under this criterion.

CRITERION 3 (ARCHITECTURE/DESIGN/CONSTRUCTION)

The subject property appears eligible for listing in the California Register under Criterion 3 for its overall Midcentury Modern architecture designed by Edward B. Page set within a Midcentury Modern landscape designed by Eckbo, Royston & Williams. The main building features a low-scale reinforced concrete construction with prominent floor plates that form projecting eaves at each floor and a glass curtain wall with a regular rhythm of aluminum frame windows that constitute the majority of the façade. The subject property was constructed in three distinct phases with Edward B. Page designing the original buildings along with their subsequent additions that included horizontal and vertical expansions of the main building and the service building. The building is set in the middle of a large Midcentury Modern landscape designed by Royston, Eckbo & Williams. This setting reinforces the notion of a corporate campus containing buildings set within large expanses of open space.

The subject property is also significant under Criterion 3 for its association with the engineering firm of John J. Gould & H. J. Degenkolb & Associates, masters in their field of engineering. Both Gould and Degenkolb were successful engineers who held prestigious positions in professional engineering associations and were widely recognized for their contributions to the field. While the engineering firm run by Gould had already made a name for itself with a number of prestigious Northern California projects, 3333 California would be the first large commission for the firm since Degenkolb was brought on as partner in 1956. As such, the subject property represents a significant period in the firm's expansion as Degenkolb took a leading role in the firm.

The subject property is also significant under Criterion 3 for its association with the master landscape firm Eckbo, Royston & Williams. Eckbo saw this project as an important commission and wrote extensively on the difficulties this specific site presented in his book on landscape architecture titled *Urban Landscape Design*, demonstrating the importance of the project in Eckbo, Royston & Williams' larger body of work.

CRITERION 4 (INFORMATION POTENTIAL)

Based upon the Archaeological Research Design and Treatment Plan prepared for the subject property, and through the preliminary archaeological review process, the planning department has determined the site to be significant under Criterion 4, which is typically associated with archaeological resources.[15] Impacts related to discovery of archaeological resources, human remains related to the Laurel Hill Cemetery, and tribal cultural resources are discussed in the initial study (see EIR Appendix B, Topic E.3, Cultural Resources, pp. 125-135). Development of archaeological testing and monitoring programs, training and communication protocols for construction personnel, development of interpretive programs, and other elements of the mitigation measures would all require approval by the planning department.

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

INTEGRITY

The HRER concurs with the determination in the HRE that the subject property retains sufficient integrity to convey its significance as a historic resource. Aside from substantial interior alterations, there have been relatively minor alterations to the site. The most substantial alterations include the construction of new entrance canopy off of California Street (1984), and modifications to the exterior landscape along Euclid Avenue for the construction of a children's playground. The HRER also acknowledges that the National Register nomination provides some additional information on major alterations to the main building and site that include tinting of the windows and spandrel panels of the main building between 1984-1985, and removal of a number of arbors over walkways between 1993 and 2001.

CHARACTER-DEFINING FEATURES

The HRER concurs with the list of character-defining features identified in the HRE prepared by LSA, which are listed in Table 4.B.1: 3333 California Street Character-Defining Features

[15] The May 14, 2018, HRER determined that the subject property is not eligible under Criterion 4 as it only reviewed the built environment (building, site and landscape features) and noted that review of archaeological resources was not included in that determination.

Identified in the HRER. See Figure 4.B.1: Character-Defining Features of 3333 California Street, p. 4.B.23, for an illustration of the character-defining features of the site.

Table 4.B.1: 3333 California Street Character-Defining Features Identified in the HRER

Site and Landscape Features	Office Building
– Corporate campus setting featuring an office building located on a large, open landscaped site across 10.25 acres	– Stepped multi-story massing built into the natural topography of the site
– Landscape utilizing curvilinear shapes in pathways, driveways, and planting areas; and other integrated landscape features (planter boxes, seating)	– Office building encompassing three distinct building phases that have all taken on significance
– Main entrance leading from Walnut and California streets	– Midcentury Modern architectural style with little ornamentation
– Brick perimeter walls, integrated planter boxes, and retaining walls of reinforced concrete and clad in stretcher bond pattern	– Flat, cantilevered roof with projecting eaves
– Mature trees around the corporate modern campus	– Continuous full-height, slightly recessed curtain wall glazing on most sides and along all levels of the building
– Open area along Euclid Avenue and Laurel Street	– Glass curtain wall composed of bronze powder-coated aluminum framing system in a regularly spaced pattern of mullions and muntins, typically with a small spandrel panel of obscure glass below a larger pane
– Concrete pergola atop terraced planting feature facing Laurel Street	

Source: LSA, 2017 and San Francisco Planning Department, 2018

California Register Eligibility Conclusion

Overall, the three reports on the subject property summarized above concur that the site is a historical resource under Criterion 1 (Events) and Criterion 3 (Architecture/Design/Construction). Based on the findings included in the planning department's HRER, for the purposes of environmental review under the CEQA, 3333 California Street, including its designed landscape spaces, is eligible for listing in the California Register as a historic resource under Criterion 1 for its association with the broad pattern of development in San Francisco as an urban adaptation of a typically suburban corporate property type, and under Criterion 3 because it embodies distinctive characteristics of Midcentury Modern commercial architecture, and for its association with master landscape architecture firm Eckbo, Royston & Williams and project engineers John J. Gould & H. J. Degenkolb & Associates. The period of significance is 1956-1966, which encompasses the period when the building was initially constructed to when the last major addition was completed. Despite some alterations that post-date the period of significance, most notably interior reconfiguration, changes to the primary entrance, and some changes to landscape elements, the project site retains sufficient integrity to convey its significance as a Midcentury Modern corporate campus. These conclusions were reached through comprehensive research of the property's history, associated historic contexts, an existing conditions survey, and evaluation.

As a property eligible for listing in the California Register, the property is considered a historical resource for the purposes of review under CEQA.

Summary of Differences Between the HRER and the National Register Registration Form

The HRER and the National Register nomination both determined that the project site is eligible for designation under Criteria A/1 (Events) and C/3 (Architecture/Design/Construction) but differ in specific findings within those eligibility criteria. The differences are minor and do not override the overall agreement of the studies that the property conveys its historical significance or affect the impact analysis. Under CEQA Guidelines section 15151, "Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The courts have looked not for perfection but for adequacy, completeness, and a good faith effort at full disclosure."[16]

The HRER's concurrence or nonconcurrence with some of the findings in both the HRE and the National Register nomination is summarized below.

- Although the HRER and the National Register nomination concur that the property is significant under Criterion A/1 (Events), the HRER does not concur with findings in the National Register nomination that the subject property is significant for its association with the FFIC as an important organization in San Francisco.
- Based on the information in the National Register nomination, the HRER concludes that the subject property is an important example of the engineering talents of John J. Gould & H. J. Degenkolb & Associates, which further supports the determination that the property is significant under Criterion C/3 (Architecture/Design/Construction).
- The information in the National Register nomination regarding the landscape architects Garrett Eckbo, Robert Royston, and Edward Williams further supports the determination that the property is significant under Criterion C/3 (Architecture/Design/Construction).
- Although the HRER and the National Register nomination concur that the property is significant under Criterion C/3 (Architecture/Design/Construction), the HRER does not concur with findings in the National Register nomination that the subject property is significant as the work of a master architect, Edward B. Page.

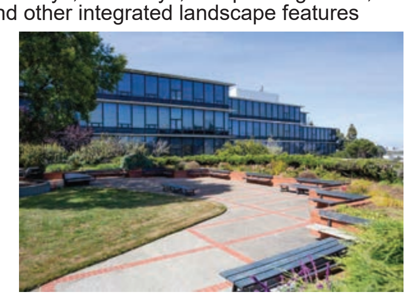
[16] California Code of Regulations, Title 14, Division 6, Chapter 3, Article 10: Considerations in Preparing EIRs and Negative Declarations, Section 15151: Standards for Adequacy of an EIR, https://govt.westlaw.com/calregs/Document/IBF6AC5A0D48811DEBC02831C6D6C108E?viewType=FullText&originationContext=documenttoc&transitionType=CategoryPageItem&contextData=(sc.Default), accessed May 25, 2018.

Site and Landscape Features

1. Corporate campus setting featuring an office building located on a large, open landscaped site across 10.25 acres

5. Mature trees around the corporate modern campus

2. Landscape utilizing curvilinear shapes in pathways, driveways, and planting areas; and other integrated landscape features

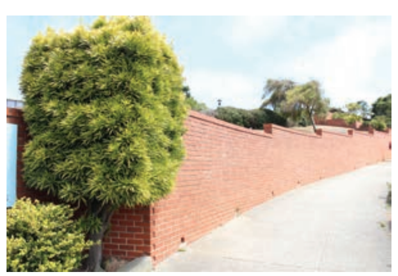


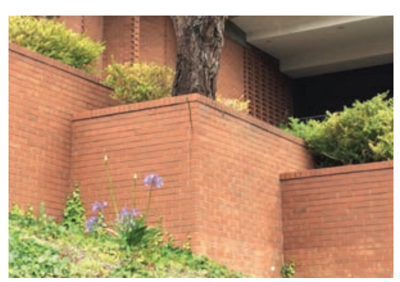
6. Open area along Euclid Avenue and Laurel Street

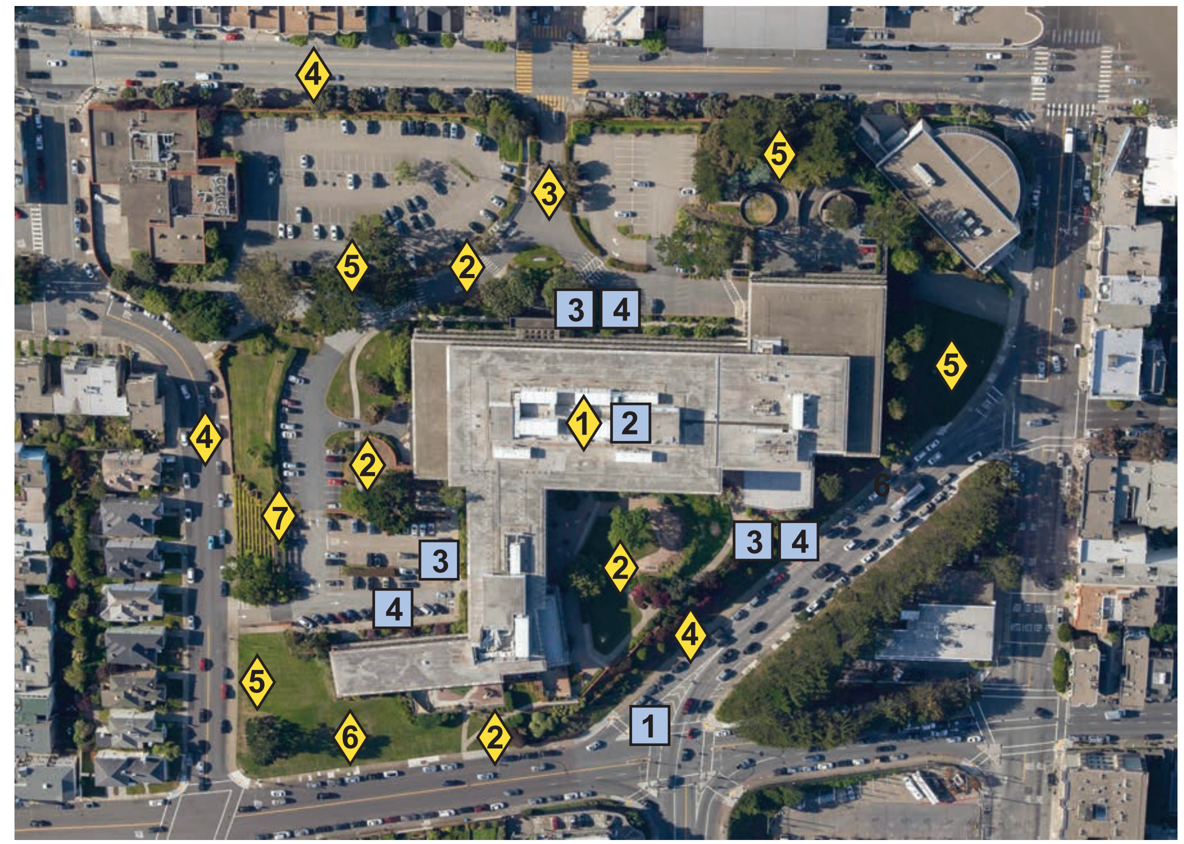
3. Main entrance leading from Walnut and California streets

7. Concrete pergola atop terraced planting feature facing Laurel Street

4. Brick perimeter walls, integrated planter boxes, and retaining walls of reinforced concrete and clad in stretcher bond pattern







Office Building Features

1. Stepped multi-story massing built into the natural topography of the site

2. Office building encompassing three distinct building phases that have all taken on significance

3. Midcentury Modern architectural style with little ornamentation

   Flat, cantilevered roof with projecting eaves

   Continuous full-height, slightly recessed curtain wall glazing on most sides and along all levels of the building

4. Glass curtain wall composed of bronze powder-coated aluminum framing system in a regularly spaced pattern of mullions and muntins, typically with a small spandrel panel of obscure glass below a larger pane

Source: LSA, December 2017; Laurel Heights Partners, LLC

3333 CALIFORNIA STREET MIXED USE PROJECT

FIGURE 4.B.1: CHARACTER DEFINING FEATURES OF 3333 CALIFORNIA STREET

- The HRER does not concur with the additional character-defining features that are listed in the National Register nomination and not listed in the HRE. In the case of architectural elements, the department finds that the additional listed elements, including the annex (service) building and circular garage ramp structures, were constructed within the period of significance but do not have prominent architectural interest. In the case of landscape elements, the department finds the identified character-defining features to be too closely aligned with a description of the landscape rather than a distillation of those essential features that communicate its significance as a Midcentury Modern landscape.

The additional character-defining features that are listed in the National Register nomination and not listed in the HRER inform the alternatives analysis. While the majority of experts who evaluated this property do not include the annex (service) building or circular garage ramp structures as character-defining features, the EIR includes a no project alternative and one full preservation alternative to address the retention of these additional features.

NEARBY HISTORIC RESOURCES OUTSIDE OF THE PROJECT SITE

Individual Resources

Fire Station No. 10 - 655 Presidio Avenue

One historic resource is located on the block faces that border the project site (the north side of California Street between Presidio Avenue and Laurel Street; the west side of Laurel Street between California Street and Euclid Avenue; the south side of Euclid Avenue between Laurel Street and Masonic Avenue; the southeast side of Masonic Avenue between Euclid Avenue and Presidio Avenue; and the east side of Presidio Avenue between Masonic Avenue and California Street). San Francisco Fire Station No. 10 is located directly southeast of the project site at 655 Presidio Avenue. This two-story reinforced concrete building was constructed in 1955 as part of the 1952 Firehouse Bond Act (Bond Act), which authorized the expenditure of $4.75 million to construct and rehabilitate firehouses throughout the city. The Bond Act was the Fire Department’s largest system-wide upgrade since the 1906 Earthquake and Fire, and it allowed for the rehabilitation of existing fire stations and for construction of new firehouses to provide faster response times in underserved areas. Station No. 10 was one of 19 new firehouses built as part of the Bond Act.

In 2010, Page & Turnbull cultural resources staff evaluated Firehouse No. 1 at 676 Howard Street. As a result of their research, Page & Turnbull concluded that Firehouse No. 1 was built as part of the Bond Act. Researching and surveying other firehouses built as a result of the Act indicated that a potential discontiguous historic district, tentatively named the San Francisco 1952 Firehouse Bond Act Thematic Historic District, was composed of 20 firehouses. This potential district appeared significant for its association with the Bond Act and the collective Late Moderne architectural qualities of its contributors.

Due to its date of construction, architectural style, and integrity, Station No. 10 appears to contribute to the potential San Francisco 1952 Firehouse Bond Act Thematic Historic District. Despite its proximity to the corporate campus at the project site and its near simultaneous year of construction, the corporate campus and Station No. 10 have no contextual or architectural relationship. The corporate campus was constructed on an open landscaped site across 10.25 acres, intended to insulate the campus from the urban environment. Conversely, by its nature, the fire station has a direct relationship with the street, in order to allow quick movement for the fire engines when needed. While deeply set back from any surrounding street, the corporate campus at the project site is nominally oriented to the north along California Street, and the fire station is oriented to the east along Presidio Avenue, with its rear façade facing west towards the project site. Topography also contributes to the lack of relationship between the two resources: the corporate campus at the project site sits atop a rise, while the fire station sits downhill of the project site and is not generally visible from the project site's main view lines. Additionally, while the two historic resources were constructed within one year of each other and are both generally designed in the Midcentury Modern architectural style, they express different interpretations of that broadly defined style. The fire station is more utilitarian in design and includes areas of stucco cladding and a low-pitched roof with overhanging eaves, while the corporate campus reflects uniformly higher-style design and emphasizes horizontality through the use of a flat roof and extensive areas of continuous glazing. Finally, the fire stations that are included in the San Francisco 1952 Firehouse Bond Act Thematic Historic District are discontiguously located within a variety of urban contexts, and do not depend on any one specific type of setting in order to be able to convey their historic significance. Overall, the corporate campus at the project site and the fire station at 655 Presidio Avenue do not share a contextual or architectural relationship.

There are no additional individual historic resources on the block faces that directly border the project site.

Broadening the scope of review to include historic resources located within a one-block radius of the project site, there are eight properties that are considered individual historic resources by the planning department, discussed below. These properties are residential, residential-over-commercial, or commercial, and were constructed between 1858 and 1923. None of the individual resources listed below have any contextual or architectural relationship with the corporate campus at the project site.

2908-2910 Bush Street

2908-2910 Bush Street, also known as the Milo Hoadley Residence, is a two-and-half-story, freestanding Italianate style residence that was constructed by an unknown builder in 1858, making it one of San Francisco's oldest homes. The building is San Francisco Landmark #216, and was placed on the local register in 1996, both for its architecture, as one of the only remaining examples of the once-common freestanding Italianate style, which predates the more common Italianate rowhomes later constructed in the city; and for its association with first owner Milo Hoadley, a surveyor who served as City Engineer starting in 1854. The building's wide lot, setback, generous width, square form, and covered porch are hallmarks of the 1850s and 1860s and distinguish it from the typical San Francisco residential streetscape.

2905 Bush Street, 2909 Bush Street, 2911 Bush Street, 2913-2915 Bush Street, and 2945-2947 Bush Street

2905 Bush Street, 2909 Bush Street, 2911 Bush Street, 2913-2915 Bush Street, and 2945-2947 Bush Street are near-contiguous, one- and two-story Queen Anne- and Italianate-style residences constructed between 1878 and 1885. All five of these buildings are considered historic resources by the City of San Francisco because they were included in the 1968 book *Here Today* and included in the accompanying survey, the findings of which were adopted by the Board of Supervisors on May 11, 1970 (Resolution No. 268-70; therefore, an adopted local register under CEQA).[17] All of these buildings derive their historic significance from their architecture, and include a high concentration of architectural detail that conveys the Queen Anne and Italianate styles and their era of construction.

3407-3421 Sacramento Street

3407-3421 Sacramento Street is a two-story Classical/Eclectic Revival-style residential-over-commercial building that was constructed in 1906. The building is considered a historic resource by the City of San Francisco because it was included in the 1968 book *Here Today* and included in the accompanying survey, the findings of which were adopted by the Board of Supervisors on May 11, 1970 (Resolution No. 268-70; therefore, an adopted local register under CEQA). The building derives its historic significance from its architecture, which includes a high concentration of architectural detail that conveys its Classical/Eclectic Revival style and its era of construction. The building may also be included in the Neighborhood Commercial Buildings Historic Resource Survey, which is currently being prepared by staff of the planning department but has not yet been adopted by the Historic Preservation Commission.

2690 Geary Boulevard

2690 Geary Boulevard is seven-story warehouse of reinforced concrete and masonry construction that was built in 1923. The property was evaluated and recorded in 1983 as part of a historic preservation tax credit program application. The building was found eligible for its association

[17] 2909 Bush Street was further evaluated by the planning department in an Historic Resource Evaluation Report (HRER) in 2013 (Case No. 2013.0219E); this HRER confirmed the historic status of 2909 Bush Street and focused its evaluation on an ancillary dwelling unit in the rear yard of the property that was constructed c. 1970 and determined not to be historic.

with the Bekins Company, its Renaissance Revival architectural qualities, and as a notable design example by architect Edward T. Flaherty. The building was subsequently assigned a California Historic Resource Status Code of "2S3," indicating that it was an "Individual Property to a district determined eligible for National Register by Part I Tax Certification. Listed in the California Register."

The building was reevaluated in 2003 by EarthTouch, Inc., archaeologist Lorna Billat as part of a Federal Communications Commission application to install a rooftop telecommunications antenna. The 2003 evaluation concurred with the earlier 1983 eligibility finding. In 2015, the building was evaluated a third time by architectural historian Alexandra Bevk. The 2015 evaluation reaffirmed the earlier 1983 and 2003 findings regarding its individual eligibility for inclusion in the National Register.

Historic Districts

Eligible California Street Historic District[18]

The south side of California Street between Baker and Lyon streets (the 3000 block) is eligible for listing in the California Register under Criterion 3 (Architecture/Design/Construction) because it features the full range of highly ornate Victorian styles, from Stick-Eastlake and Queen Anne single-family dwellings to Edwardian multi-family dwellings with prominent rounded bay windows. The south side of the block contains a sufficient concentration of historically and aesthetically related buildings such that it would be eligible for listing in the California Register. The boundaries of this historic district include buildings on the south side of the 3000 block of California Street; however, they may be subject to expansion should a more detailed survey of the Western Addition take place in the future. Contributors to the district are buildings constructed sometime between 1886 and 1905 that retain most original architectural detailing on their primary façades.

Eligible Presidio Heights Historic District[19]

The residential district bordered generally by Pacific Avenue at the north, Presidio Avenue at the east, Clay Street at the south, and Arguello Boulevard at the west, is eligible for listing in the California Register under Criterion 3 (Architecture/Design/Construction) because it exhibits a concentration of large, frequently formal dwellings, with an overall cohesive and consistent pattern of massing and setbacks, as well as an overall superior level of architectural detailing and

[18] San Francisco Planning Department, CEQA Categorical Exemption Determination, 3009 California Street Case No 2015-004339ENV, June 22, 2015 and Preservation Team Review Form, June 19, 2015.
[19] San Francisco Planning Department, Certificate of Determination Exemption from Environmental Review, 3591 Jackson Street (Case No 2013.1662E), February 13, 2015 and Historic Resource Evaluation Response, January 23, 2014.

materials. Collectively, the district also embraces a significant concentration of residences designed by master architects in San Francisco. The period of significance for the district is circa 1890 to 1930, although the vast majority of properties were constructed between 1905 and 1925. The district is almost exclusively residential and includes a few scattered examples of late-Victorian (typically Queen Anne) architecture; but is most frequently characterized by Shingle (or First Bay Region), Arts & Crafts, Classical Revival, Colonial Revival, Tudor Revival, French Provincial and Mediterranean Revival design influences.

Potentially Eligible California Street Neighborhood Commercial Shopping Center District

In the course of survey work for the Neighborhood Commercial Buildings Historic Resource Survey, the planning department identified the California Street Neighborhood Commercial Shopping Center District (referred to herein as the "Laurel Village Shopping Center"), directly west of the project site as a potential historic district. This commercial strip development is composed of 28 buildings built between 1948 and 1955 on the south side of California Street by the builder/developer Heyman Brothers for the Mayfair Building Company. The shopping center occupies an approximately 4.5-acre portion of the site of the former Laurel Hill Cemetery bounded by California Street, Mayfair Drive, Spruce Street, and Laurel Street. Massing and scale of the buildings are typically one story, with several two-story buildings covered with flat or very low-pitched roofs. Most buildings are sited with no setback from the sidewalk. Architectural styling is typically Midcentury Modern, with some added ornamentation such as stacked Roman brick trim, faux quoining (corner stones), canopies, and metal-trimmed box canopies, as well as other subsequent modifications or remodels by tenants and owners. Other aspects identified include wide sidewalks with pedestrian crosswalk bulb-outs, angled on-street parking, and "marbelite" (composite stone, resin, and pigment) street lamp posts.

Of the 28 buildings in the shopping center, planning department survey teams identified a cluster of 13 buildings associated with the first phase of development after Laurel Hill Cemetery closed and was cleared for development. This cluster was built between 1948 and 1955 in the Midcentury Modern style; most of the buildings "retain a high level of integrity."[20] The eastern boundary of this building cluster is adjacent to and across Laurel Street from the project site.

All 13 parcels identified in the cluster are contributors to the identified potential California Register-eligible district and have been assigned a 3CD status code, "appears eligible for CR [California Register] as a contributor to a CR [California Register] eligible district through a survey evaluation," in the California Office of Historic Preservation's Historic Resources Status

[20] San Francisco Planning Department, Neighborhood Commercial Buildings Historic Resource Survey, 2017, http://sf-planning.org/neighborhood-commercial-buildings-historic-resource-survey, accessed February 27, 2018.

codes.[21] The Neighborhood Commercial Buildings Historic Resource Survey is currently being prepared by staff of the planning department but has not yet been adopted by the Historic Preservation Commission.

REGULATORY FRAMEWORK

This subsection describes the federal, state, and local laws and regulations that pertain to the identification and regulation of historic architectural resources.

FEDERAL

National Register of Historic Places

The National Register of Historic Places is the nation's master inventory of cultural resources worthy of preservation. It is administered by the National Park Service, which is represented at the state level by the State Historic Preservation Officer. The National Register includes listings of buildings, structures, sites, objects, and districts that possess historic, architectural, engineering, archaeological, or cultural significance at the federal, state, or local level. Resources that are listed in or have been found by the State Historic Preservation Officer to be eligible for listing in the National Register are called historic properties. The National Register provides four evaluative criteria to determine eligibility of a resource:

> The quality of significance in American history, architecture, archeology and culture is present in districts, sites, buildings, structures, and objects of state and local importance that possess integrity of location, design, setting, materials, workmanship, feeling and association, and:
>
> - that are associated with events that have made a significant contribution to the broad patterns of history; or
> - that are associated with the lives of persons significant in our past; or
> - that embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
> - that have yielded or may likely yield information important in prehistory or history.[22]

[21] San Francisco Planning Department, California Street Neighborhood Commercial Shopping Center District (NC-S) (Maple Street – Laurel Street), http://50.17.237.182/docs/preservation/ncdsurvey/California%20NC-S.pdf, accessed March 14, 2018.

[22] Code of Federal Regulations, Title 36, Chapter 1, Part 60, Section 60.4.

Although there are exceptions, certain kinds of resources are not usually considered for listing in the National Register. These include religious properties, moved properties, birthplaces and graves, cemeteries, reconstructed properties, commemorative properties, and properties that have achieved significance within the past 50 years.

Integrity

In addition to qualifying for listing under at least one of the National Register criteria, a property must possess sufficient integrity to be considered eligible for listing in the National Register. According to the *National Register Bulletin: How to Apply the National Register Criteria for Evaluation*, integrity is defined as "the authenticity of an historical resource's physical identity evidenced by the survival of characteristics that existed during the resource's period of significance." The *National Register Bulletin* defines seven characteristics of integrity, as follows:

<u>Location</u> is the place where the historic property was constructed.

<u>Design</u> is the combination of elements that create the form, plans, space, structure, and style of the property.

<u>Setting</u> addresses the physical environment of the historic property inclusive of the landscape and spatial relationships of the buildings.

<u>Materials</u> refer to the physical elements that were combined or deposited during a particular period of time and in a particular pattern of configuration to form the historic property.

<u>Workmanship</u> is the physical evidence of the crafts of a particular culture or people during any given period in history.

<u>Feeling</u> is the property's expression of the aesthetic or historic sense of a particular period of time.

<u>Association</u> is the direct link between an important historic event or person and an historic property.

The Secretary of the Interior's Standards for the Treatment of Historic Properties

The *Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings* (the Secretary's Standards) were published in 1995 and codified as 36 Code of Federal Regulations 68.[23,24] Neither technical nor prescriptive, these standards are intended to promote responsible preservation practices that help protect irreplaceable cultural resources. The Secretary's Standards consist of ten basic principles created to help preserve the distinctive character of an historic building and its site while allowing for reasonable changes to meet new needs. The preamble to the Secretary's Standards states that they "are to be applied to specific rehabilitation projects in a reasonable manner, taking into consideration economic and technical feasibility." The following are the standards for Rehabilitation of a historic resource.

Standard 1: A property shall be used for its historic purpose or be placed in a new use that requires minimal change to the defining characteristics of the building and its site and environment.

Standard 2: The historic character of a property shall be retained and preserved. The removal of historic materials or alteration of features and spaces that characterize a property shall be avoided.

Standard 3: Each property shall be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or architectural elements from other buildings, shall not be undertaken.

Standard 4: Most properties change over time; those changes that have acquired historic significance in their own right shall be retained and preserved.

Standard 5: Distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a historic property shall be preserved.

Standard 6: Deteriorated historic features shall be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature shall match the old in design, color, texture, and other visual qualities and, where possible, materials. Replacement of missing features shall be substantiated by documentary, physical, or pictorial evidence.

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[23] U. S. Department of the Interior, National Park Service (Kay D. Weeks and Anne E. Grimmer), *The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstruction of Historic Buildings,* 1995, updated 2017, https://www.nps.gov/tps/standards/treatment-guidelines-2017.pdf and National Park Service Technical Preservation Services, Four Approaches to the Treatment of Historic Properties, https://www.nps.gov/tps/standards/four-treatments.htm, accessed May 3, 2018.

[24] Treatments are defined as follows: "Preservation" acknowledges a resource as a document of its history over time and emphasizes stabilization, maintenance, and repair of existing historic fabric. "Rehabilitation" is the most widely used standard; while also incorporating the retention of features that convey historic character, "Rehabilitation" also accommodates alterations and additions to facilitate continuing or new uses. "Restoration" involves the retention and replacement from a specific period of significance. "Reconstruction," the least-used treatment, provides a basis for re-creating a missing resource.

Standard 7: Chemical or physical treatments, such as sandblasting, that cause damage to historic materials shall not be used. The surface cleaning of structures, if appropriate, shall be undertaken using the gentlest means possible.

Standard 8: Significant archeological resources affected by a project shall be protected and preserved. If such resources must be disturbed, mitigation measures shall be undertaken.

Standard 9: New additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment.

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

STATE

Definition of Historical Resources under CEQA

CEQA Guidelines section 15064.5(a), in Title 14 of the California Code of Regulations, defines a "historical resource" as:

(1) A resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources.

(2) A resource included in a local register of historical resources, as defined in section 5020.1(k) of the Public Resources Code or identified as significant in an historical resource survey meeting the requirements of section 5024.1(g) of the Public Resources Code, shall be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.

(3) Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the California Register of Historical Resources.

(4) The fact that a resource is not listed in, or determined to be eligible for listing in the California Register of Historical Resources, not included in a local register of historical resources (pursuant to section 5020.1(k) of the Public Resources Code), or identified in an historical resources survey (meeting the criteria in section 5024.1(g) of the Public Resources Code) does not preclude a lead agency from determining that the resource may be an historical resource as defined in Public Resources Code sections 5020.1(j) or 5024.1.

Therefore, under the CEQA Guidelines, even if a resource is not included on any local, state, or federal register, or identified in a qualifying historical resources survey, a lead agency may still determine that any resource is a historical resource for the purposes of CEQA if there is substantial evidence supporting such a determination. A lead agency must consider a resource to be historically significant if it finds that the resource meets the criteria for listing in the California Register.

California Register of Historical Resources Criteria

The California Register is the authoritative guide to historical and archaeological resources that are significant within the context of California's history. Criteria for eligibility for inclusion in the California Register are based on, and therefore correspond to, National Register criteria for listing. A resource that meets at least one of the eligibility criteria for inclusion in the California Register is considered a historical resource for the purposes of CEQA. A resource is eligible for listing in the California Register if it:

(1) Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage (Events);

(2) Is associated with the lives of persons important in our past (Persons);

(3) Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values (Design/Construction); or

(4) Has yielded, or may be likely to yield, information important in prehistory or history (Information Potential).[25]

National Park Service guidance on evaluating the integrity of resources often informs the determination of eligibility under the California Register.

LOCAL

San Francisco Planning Code Section 101.1: Master Plan Priority Policies

Planning Code section 101.1 is generally applicable to the proposed project and project variant. It requires that the city find that the proposed project is consistent on balance with eight master plan priority policies. Priority Policy 7 is relevant to historical resources and establishes a priority policy "that landmarks and historic buildings be preserved."

[25] Public Resources Code section 5024.1.

San Francisco General Plan

The Urban Design Element of the *San Francisco General Plan* includes the following policy related to historic preservation:

Policy 2.4: Preserve notable landmarks and areas of historic, architectural or aesthetic value, and promote the preservation of other buildings and features that provide continuity with past development.

Policy 2.5: Use care in remodeling of older buildings, in order to enhance rather than weaken the original character of such buildings.

San Francisco Planning Department, CEQA Review Procedures for Historical Resources

The planning department prepared the *CEQA Review Procedures for Historic Resources* to provide guidance in determining whether a resource is considered a historical resource as defined by CEQA.[26] Three categories of properties are defined:

Category A. Category A has two subcategories:

- Category A.1. Resources listed in or formally determined to be eligible for the California Register.
- Category A.2. Resources listed in adopted local registers, or properties that appear eligible, or may become eligible, for the California Register.

Category B. Properties requiring further consultation and review.

Category C. Properties determined not to be historical resources, or properties for which the City has no information indicating that the property is an historical resource.

To determine if a property is eligible as a historical resource for the purposes of CEQA, the planning department (lead agency) requires an evaluation of a property's individual significance for listing in the California Register, as well as an examination of a property's relationship to any eligible historic district.

To assess impacts within historic districts, the planning department examines several factors including, but not limited to, size and significance of a historic district, number and location of contributing features/non-contributing features, district integrity, district boundaries, and the proposed project. Assessments within historic districts are examined on a case-by-case basis, due to the wide variety and unique nature of historical resources.

[26] San Francisco Planning Department, *Preservation Bulletin No. 16, CEQA Review Procedures for Historic Resources*, Draft, March 31, 2008.

IMPACTS AND MITIGATION MEASURES

SIGNIFICANCE THRESHOLDS

The thresholds for determining the significance of impacts in this analysis are consistent with the environmental checklist in Appendix G of the State CEQA Guidelines, which has been modified by the planning department. For the purpose of this analysis, the following applicable thresholds were used to determine whether implementing the proposed project or project variant would result in a significant impact related to historic architectural resources. Implementation of the proposed project or project variant would have a significant effect related to historic architectural resources if the project would:

- Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5, including those resources listed in Article 10 or Article 11 of the San Francisco Planning Code.

The CEQA Guidelines (section 15064.5(b)) establish the criteria for assessing a significant environmental impact on historical resources. They state, "[a] project with an effect that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment." The CEQA Guidelines define "substantial adverse change" as "physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired" (section 15064.5(b)(1)).

CEQA Guidelines section 15064.5(b)(2)(C) provides the significance threshold for evaluating impacts on historical resources under CEQA.

> The significance of an historical resource is materially impaired when a project [d]emolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA.

APPROACH TO ANALYSIS

As discussed in the "Environmental Setting" subsection, pp. 4.B.2-4.B.30, based on background research and analysis prepared by qualified architectural historians, and with independent review and concurrence from the planning department's preservation technical specialists, the planning department, as lead agency, has determined that the 3333 California Street property meets the eligibility criteria for inclusion in the California Register under Criterion 1 (Events) and Criterion 3 (Design/Construction). As such, it is considered a historical resource under CEQA Guidelines section 15064.5(a)(3). The HRER identifies the character-defining features of the resource that contribute to and convey its historic and architectural significance and that justify the resource's eligibility for inclusion in the California Register.

As discussed above under "Significance Thresholds," a project's impact on a historical resource is evaluated under CEQA's "material impairment" standard. Under that standard, a significant impact on a historical resource results when a project demolishes or materially alters the resource's physical characteristics that justify its eligibility for inclusion in the California Register. Generally, if a project follows the Secretary's Standards (as listed on pp. 4.B.31-4.B.32 under "Regulatory Framework"), the project would not cause significant impacts (CEQA Guidelines section 15064.5 (b)(3)). Although conformance with the Secretary's Standards indicates that a project would have a less-than-significant impact on an historical resource, a project that does not conform with the Secretary's Standards does not, per se, result in a significant impact under CEQA. Alterations that are not entirely in conformance with the Secretary's Standards may, or may not, result in a significant impact under the "material impairment" significance standard of CEQA Guidelines Section 15064.5(b)(1).

PROJECT FEATURES

The proposed project would demolish the annex building, surface parking lots, the circular garage ramp structures along California Street, and all of the project site's existing designed landscape elements and features. Under the proposed project, the office building would be reconfigured, through selective demolition and alterations, into two buildings, and 13 new buildings would be constructed along the California Street, Presidio Avenue, Masonic Avenue, Euclid Avenue, and Laurel Street frontages. The proposed renovated and new buildings and new landscape features are described below.

Alterations to the Existing Office Building

The existing office building at the center of the project site would be reconfigured, through selective demolition and alterations, into two buildings, Center Building A and Center Building B, both of which would be adapted to include residential use. To achieve this reconfiguration, areas of the office building would be demolished, including the following: the Laurel Street wing, the Euclid Avenue wing, and portions of the California Street wing including the existing fourth floor; the three-level, partially below-grade parking garage at the east end of the north elevation; the theater at the east end of the south elevation; and the primary entrance bay at the north elevation. A section of the middle of the building behind the current primary entrance would be removed, physically separating the existing office building into two buildings. The interior of the east building would be modified to create an interior courtyard for Center Building B, and a bridge at the fourth floor would connect the two adaptively reused buildings.

New construction would include reconstruction of the fourth floor at both Center Buildings A and B. Two new set-back stories at Center Building A would be constructed to a total height of 80 feet. Two and three new set-back stories at the east and west portions of Center Building B would be constructed to a total height of 80 and 92 feet, respectively. Both buildings would be residential and include a mix of residential units, lobbies, and amenity spaces.

At the retained portions of the office building, the existing horizontal floor lines would be restored, and this design motif is expected to be incorporated into the new upper stories. The existing spandrel panels would be replaced with a high-performance window system, and additional vertical articulation would be added through the installation of windows and recessed balconies. The material palette for exterior renovations would generally include high-performance vision glass, white metal for horizontal floor lines, graphite metal for window framing, and natural wood-toned accent panels, which would be used at ground-floor vertical elements and the top horizontal cornice line.

New Building Construction

The new buildings would be constructed along the perimeter of the project site and would consist of the following:

Plaza A and Plaza B Buildings

The Plaza A and Plaza B buildings would be two four-story, 45-foot-tall mixed-use residential buildings with ground-floor retail along California Street between Laurel and Walnut streets. The design of these buildings would be modern, although they would take design cues from the neighborhood context, including rhythmic vertical bays found at buildings with residential flats in the neighborhood; punched window forms found at multi-unit apartment buildings in the neighborhood; horizontal planes found at the office building at the project site and the Laurel Village Shopping Center, directly west of the project site on California Street; and stepped massing and railings found at Modern-style buildings with residential flats in the neighborhood. The material pallet for the Plaza B and Plaza A Buildings would include stucco, buff-colored brick veneer, white metal, horizontal and vertical siding, and porcelain tile.

Walnut Building

The proposed Walnut Building would be a three-story, 45-foot-tall mixed-use office building with ground-floor retail and child care space along California Street east of Walnut Street. The design of the Walnut Building would be modern, although it would take design cues from the neighborhood context, including vertical bays of framed windows found in larger scale buildings such as the Jewish Community Center on California Street, and the projecting box moldings found in smaller scale Midcentury Modern residential buildings west of the project site in the Laurel Heights subdivision. The Walnut Building would include large areas of glazing, and the material pallet would include glass, buff-colored brick veneer, board-formed concrete, charcoal metal, and porcelain tile.

The project variant would include residential units instead of the office space in the Walnut Building, which would result in no office space on the project site and a reduction in the amount of overall retail space. The Walnut Building would include two additional residential floors and would be 67 feet in height under this variant, rather than 45 feet as currently proposed.

Masonic Building

The Masonic Building would be a four- to six-story, 40-foot-tall residential building along Masonic Avenue where the site's topography changes. As a result of the slope (an approximately 65-foot difference from the southwest corner to the northeast corner), the proposed building would have up to six stories but not exceed 40 feet in height. The design of the Masonic Building would be modern, although it would take design cues from the neighborhood context, including rhythmic vertical bays found at residential buildings in the neighborhood. The material pallet would include fiber cement panels, vertically oriented siding, stucco, and large areas of glazing with mullions.

Euclid Building

The Euclid Building would be a four- to six-story, 40-foot-tall mixed-use building with limited ground-floor retail space fronting the south end of the proposed Walnut Walk near the intersection of Euclid and Masonic avenues. For the same reason as the Masonic Building (change in the site's topography), the Euclid Building would be up to six stories but not exceed 40 feet in height. The design of the Euclid Building would be modern, although it would take design cues from the neighborhood context, including rhythmic vertical bays found at residential buildings with in the neighborhood. The material pallet would include wood siding, stucco, vertical gardens, and large areas of glazing with mullions.

Laurel Duplexes

The Laurel Duplexes would consist of seven two-unit, 37-to-40-foot-tall residential townhomes along Laurel Street. The design of the duplexes would be modern, although they would take design cues from the neighborhood context, including horizontal planes found at the office building at the project site and the Laurel Village Shopping Center; and stepped massings and railings found at Modern-style residential buildings in the neighborhood. The material pallet would include board form concrete, wood slats, stucco, and large areas of glazing with mullions.

Mayfair Building

The Mayfair Building would be a four-story, 40-foot-tall residential building near the Laurel Street and Mayfair Drive intersection. The design of the Mayfair Building would be modern, although it would take design cues from the neighborhood context, including punched window forms found at multi-unit apartment buildings in the neighborhood; and stepped massing and railings found at Modern-style residential buildings in the neighborhood. The material pallet would include wood shingle, stucco, wood siding, and the façade would include large areas of glazing and window planter boxes.

Open Space and Landscaping

In addition to alterations to the existing office building and the construction of 13 new buildings, improvements made at the project site would include open space and landscaping. Installation of these improvements would require the demolition and removal of portions of the office building, the main entrance from California Street, curvilinear pathways, driveways and planting areas throughout the project site, and trees.

The proposed project or project variant would result in approximately 236,000 square feet of open area (approximately 53 percent of the site), to be developed with a combination of common open space, a portion of which would be available for public use, and private walkways, terraces, and internal courtyards. Two pedestrian promenades are planned: Walnut Walk, which would extend north-south through the project site between California Street and Masonic Avenue; and Mayfair Walk, which would extend east-west through the project site between Mayfair Street and Presidio Avenue. New landscaped spaces would be provided throughout the project site, including California Plaza (approximately 3,300 square feet) within the setback of the proposed Plaza A Building along California Street; Presidio Overlook (approximately 3,800 square feet) at the eastern terminus of Mayfair Walk; Masonic Plaza (approximately 3,000 square feet), between Center Building B and the Masonic Building along Masonic Avenue; and Euclid Green (approximately 18,760 square feet), extending from the intersection of Euclid Avenue and Laurel Street at the southwest corner of the site toward the corner of Masonic and Euclid avenues.

The proposed project or project variant would remove 185 on-site trees to allow for demolition, excavation, and site preparation. The proposed project would add approximately 92 new street trees along California Street, Masonic Avenue, Euclid Avenue, and Laurel Street. A total of 20 trees would be planted on the extension of Walnut Street into the project site. Approximately 250 new trees would also be planted within the project site along the proposed Mayfair and Walnut walks and other common open spaces that are open to the public as well as private and common open spaces (a net gain of 85 trees from existing conditions). The proposed project would also retain ten mature existing trees, if viable: two mature Coast Live Oak trees at the western entrance to the proposed Mayfair Walk; two Cypress trees at the proposed Cypress Square; three mature Coast Redwood trees at the eastern end of the proposed Mayfair Walk; one mature Monterey Pine tree at the west end of the proposed Euclid Green; and two mature Coast Live Oak trees mid-block on Laurel Street between Mayfair Drive and Euclid Avenue.

IMPACT EVALUATION

Impact CR-1: The proposed project or project variant would cause a substantial adverse change in the significance of a historical resource as defined in section 15064.5 of the CEQA Guidelines. ***(Significant and Unavoidable with Mitigation)***

The Midcentury Modern-designed corporate campus at 3333 California Street, built between 1956 and 1966, is eligible for listing in the California Register of Historical Resources as an individual property under Criterion 1 for its association with the broad pattern of development in San Francisco as a unique urban adaptation of a typically suburban property type (corporate campus) and under Criterion 3 for its uniform Midcentury Modern architectural qualities, and for its association with master landscape design firm Eckbo, Royston & Williams and master engineering firm of John J. Gould & H. J. Degenkolb & Associates. As such, the property is considered a "historical resource" for the purposes of the CEQA.

The HRER identifies "Character-Defining Features," presented on pp. 4.B.20-4.B.21, that are the distinctive qualities and characteristics of 3333 California Street site that convey the property's historic and architectural significance and justify its eligibility for listing in the California Register of Historical Resources.

The proposed project or the project variant would demolish portions of the office building, demolish the annex building, and remove all of the project site's existing designed landscape elements and features, including, but not limited to, the curvilinear shapes in pathways, driveways, and planting areas; integrated landscape features, including planter boxes and seating; brick perimeter walls; and the concrete pergola and terraced planting feature facing Laurel Street. The clearing of the perimeter of the site under the proposed project or project variant, including hardscape features and mature plantings, would eliminate most of these character-defining landscape features that contribute to and convey the historic and architectural significance of the project site as a Midcentury Modern corporate campus.

The proposed project or project variant would replace the landscaped and open setbacks that characterize the Midcentury Modern corporate campus with a mix of 13 new buildings and new designed landscapes along the periphery of the site. Construction of the proposed new infill buildings would line the street perimeter of the site, obstructing prominent views of the existing office building from public rights-of-way through open landscaped grounds to a greater degree than under current conditions.

Additionally, under the proposed project or project variant, the office building would undergo a series of alterations including demolition of approximately half of the building, including a parking garage, two wings, and a section of the middle of the building, effectively dividing one building into two; replacement of the existing glass curtain wall; replacement of the projecting floor plates with updated projecting floorplates; and construction of new projecting vertical bays. These alterations would materially alter the character-defining Midcentury Modern characteristics of the office building. Overall, the proposed project or project variant would result in substantial changes to the massing and materiality of the office building such that the project site would no longer convey its historic and architectural significance as a Midcentury Modern corporate campus.

The planning department's HRER evaluated project impacts using the relevant Secretary's Standards, which are described in full on pp. 4.B.31-4.B.32. The planning department determined that the proposed project or project variant would not be in conformance with the Secretary's Standards and would materially impair the historic resource at the project site.[27] Standard 1 states that "a property shall be used for its historic purpose or be placed in a new use that requires minimal change to the defining characteristics of the building and its site and environment." Regarding Standard 1, alteration of the main building for renovation into housing would entail demolition of approximately half of the building footprint and replacement of the existing glass curtain wall, which has been identified as a character-defining feature. Although the floor plates that reveal a deep eave would still be visible in the portions of the main building that would be retained, the changes proposed to adapt the building for a new use would be far beyond the minimal changes identified as being acceptable under Standard 1. Also, the large open landscaped site that contains design elements integrated with the existing office building, which has also been identified as a character-defining feature of the subject property, would largely be infilled with new construction and the site would no longer feel like a corporate campus, thus altering the environment of the property. Thus, the proposed project or project variant would not conform with Standard 1.

Standard 2 states that "the historic character of a property shall be retained and preserved. The removal of historic materials or alteration of features and spaces that characterize a property shall be avoided." Standard 5 states that "distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a historic property shall be preserved." Regarding Standard 2 and 5, the proposed project or project variant would involve substantial modifications to both the main building and surrounding landscape such that its historic character would not be retained or preserved. The proposed project or project variant would involve removal of many of the materials of the main building and surrounding landscape that have been identified as character-defining features. The setting would be lost with redevelopment of the open space and construction of 13 new buildings along the periphery of the site. The replacement of the glass curtain wall system would be with a system more weighted toward a residential design, which

[27] Justin Greving, Preservation Planner, San Francisco Planning Department, *Historic Resource Evaluation Response (Part 2), Case No. 2015-014028ENV, 3333 California Street*, May 14, 2018. (See EIR Appendix C-4.)

could result in material changes to its distinctive features and finishes, which are present on each of the building's façades. For this reason, the alterations to the building and landscape, through the infill of open spaces and removal of specific elements of the character-defining landscape features, would not conform with Standard 2 and would alter distinctive design elements of the building which would not conform with Standard 5. Additionally, the proposed alterations to the main building would also not preserve the historic character of the property. Altogether, the loss of 50 percent of the building footprint, which would include separating the main building into two distinct forms, and the removal and replacement of the glass curtain wall, would not conform with Standard 2 or 5.

Standard 3 states that "each property shall be recognized as a physical record of its time, place, and use," and, "changes that create a false sense of historical development, such as adding conjectural features or architectural elements from other buildings, shall not be undertaken." Because the proposed project does not include Rehabilitation of the building or retention of the landscape and does not introduce features or elements that create a false sense of historical development, Standard 3 does not apply.

Standard 4 states, "changes that have acquired historic significance in their own right shall be retained and preserved." Aside from the previously determined phases of construction that have all taken on significance, there are no other changes to the property that have taken on significance. Therefore Standard 4 does not apply.

Standard 6 states, "deteriorated historic features shall be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature will match the old in design, color, texture, and where possible, materials. Replacement of missing features will be substantiated by documentary and physical evidence." The proposed project or project variant will replace the glass curtain wall with a new glass curtain wall that will not match the existing glass curtain wall in design, color, texture or materials. Thus, the proposed project or project variant would not conform with Standard 6.

Standard 7 states that "chemical or physical treatments, such as sandblasting, that cause damage to historic materials shall not be used." Because the proposed project does not include the retention of historic materials, Standard 7 does not apply. Rehabilitation Standard 8 states that "significant archeological resources affected by a project shall be protected and preserved" and that "if such resources must be disturbed, mitigation measures shall be undertaken." Mitigation has been identified to reduce the potential impact to archaeological resources to a less-than-significant level (see Topic E.3, Cultural Resources, pp. 125-135, of the initial study [EIR Appendix B]). Thus, the proposed project or project variant would conform with Standard 8.

Standard 9 states that "new additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work will be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment." Regarding Standard 9, the proposed project or project variant would include the construction of 13 new buildings that would alter the spatial configuration of the large open designed landscape of the subject property, which is considered a character-defining feature. These open areas help create the campus-like feel of the subject property, and to infill these areas would alter the sense of a corporate campus setting. Other character-defining landscape details, such as curvilinear shapes within the pathways, driveways, and planting areas, and hardscape features such as the brick perimeter and retaining walls, integrated planter boxes and seating would also be removed. Exterior alterations to the main building would substantially alter the general form of the building, both in its general massing but also in the materiality of the exterior elevations. Although the casual observer may infer that the new construction does incorporate the existing building, the alterations in their entirety would not meet the goal of Standard 9 in protecting the integrity of the property and its surrounding environment. Thus, the proposed project or project variant would not conform with Standard 9.

Standard 10 states that "new additions and adjacent or related new construction will be undertaken in such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired." Regarding Standard 10, the proposed project or project variant would involve the removal of most character-defining landscape and site features and substantial modifications to the main building. If new construction were removed in the future, the landscape and site features would not be able to be replaced, and the changes to the main building could not be reversed, leaving the essential form and integrity of the historic property impaired. Thus, the proposed project or project variant would not conform with Standard 10.

For these reasons, including the removal of elements that convey the project site's history as a corporate campus, the construction of new buildings on formerly open and/or landscaped space at the project site, and the changes to the massing and materiality of the office building, the proposed project and project variant would not be in conformance with Standards 1, 2, 5, 6, 9, and 10, and would materially alter the physical characteristics of 3333 California Street that convey its historic significance and that justify its inclusion in the California Register. As such, the proposed project or project variant would cause a substantial adverse impact on 3333 California Street, a historical resource, and would be considered a significant impact under CEQA.

Chapter 6, Alternatives, presents a range of alternatives that would meet most of the project objectives and could avoid or substantially lessen significant effects of demolition under the proposed project. The Alternatives chapter includes alternatives that would retain, in whole or in part, existing elements of the project site.

Implementation of Mitigation Measures M-CR-1a: Documentation of Historical Resource and M-CR-1b: Interpretation of the Historical Resource, shown below, would lessen the impact of the proposed demolition and new construction within the project site by documenting and presenting the complex's history and character as a Midcentury Modern-designed corporate campus. However, these mitigation measures would not reduce this impact to a less-than-significant level.

Mitigation Measure M-CR-1a: Documentation of Historical Resource

Prior to issuance of demolition or site permits, the project sponsor shall undertake Historic American Building/Historic American Landscape Survey-like (HABS/HALS-like) documentation of the building and associated landscape features. The documentation shall be undertaken by a professional who meets the Secretary of the Interior's Professional Qualifications Standards for Architectural History, History, or Architecture (as appropriate) to prepare written and photographic documentation of 3333 California Street. The specific scope of the documentation shall be reviewed and approved by the Planning Department but shall include the following elements:

Measured Drawings – A set of measured drawings shall be prepared that depict the existing size, scale, and dimension of the historic resource. Planning Department Preservation staff will accept the original architectural drawings or an as-built set of architectural drawings (e.g., plans, sections, elevations). Planning Department Preservation staff will assist the consultant in determining the appropriate level of measured drawings;

Historic American Buildings/Historic American Landscape Survey-Level Photographs – Either Historic American Buildings/Historic American Landscape Survey (HABS/HALS) standard large-format or digital photography shall be used. The scope of the digital photographs shall be reviewed by Planning Department Preservation staff for concurrence, and all digital photography shall be conducted according to the latest National Park Service (NPS) standards. The photography shall be undertaken by a qualified professional with demonstrated experience in HABS/HALS photography. Photograph views for the data set shall include contextual views; views of each side of the building and interior views, including any original interior features, where possible; oblique views of the building; and detail views of character-defining features, including landscape elements.

All views shall be referenced on a photographic key. This photographic key shall be on a map of the property and shall show the photograph number with an arrow to indicate the direction of the view. Historic photographs shall also be collected, reproduced, and included in the data set.

HABS/HALS Historical Report – A written historical narrative and report shall be provided in accordance with the HABS/HALS Historical Report Guidelines. The written history shall follow an outline format that begins with a statement of significance supported by the development of the architectural and historical context in which the structure was built and subsequently evolved. The report shall also include architectural description and bibliographic information.

Video Recordation – Video recordation shall be undertaken before demolition or site permits are issued. The project sponsor shall undertake video documentation of the affected historical resource and its setting. The documentation shall be conducted by a professional videographer, one with experience recording architectural resources. The documentation shall be narrated by a qualified professional who meets the standards for history, architectural history, or architecture (as appropriate) set forth by the Secretary of the Interior's Professional Qualification Standards (36 Code of Federal Regulations Part 61). The documentation shall include as much information as possible—using visuals in combination with narration—about the materials, construction methods, current condition, historic use, and historic context of the historical resource. This mitigation measure would supplement the traditional HABS/HALS documentation, and would enhance the collection of reference materials that would be available to the public and inform future research.

Softcover Book – A Print-on-Demand softcover book shall be produced that includes the content from the historical report, historical photographs, HABS/HALS photography, measured drawings, and field notes. The Print-on-Demand book shall be made available to the public for distribution.

The project sponsor shall transmit such documentation to the History Room of the San Francisco Public Library, San Francisco Architectural Heritage, the Planning Department, and the Northwest Information Center. The HABS/HALS documentation scope will determine the requested documentation type for each facility, and the project sponsor will conduct outreach to identify other interested groups. All documentation will be reviewed and approved by the Planning Department's Preservation staff before any demolition or site permit is granted for the affected historical resource.

Mitigation Measure M-CR-1b: Interpretation of the Historical Resource

The project sponsor shall facilitate the development of an interpretive program focused on the history of the project site. The interpretive program should be developed and implemented by a qualified professional with demonstrated experience in displaying information and graphics to the public in a visually interesting manner, such as a museum or exhibit curator. This program shall be initially outlined in a proposal for an interpretive plan subject to review and approval by Planning Department Preservation staff. The proposal shall include the proposed format and location of the interpretive content, as well as high-quality graphics and written narratives. The proposal prepared by the qualified consultant describing the general parameters of the interpretive program shall be approved by Planning Department Preservation staff prior to issuance of the architectural addendum to the site permit. The detailed content, media and other characteristics of such interpretive program shall be approved by Planning Department Preservation staff prior to issuance of a Temporary Certificate of Occupancy.

The interpretative program shall include but not be limited to the installation of permanent on-site interpretive displays or screens in publicly accessible locations. Historical photographs, including some of the large-format photographs required by Mitigation Measure M-CR-1a, may be used to illustrate the site's history.

The primary goal is to educate visitors and future residents about the property's historical themes, associations, and lost contributing features within broader historical, social, and physical landscape contexts. These themes would include but not be limited to the subject property's historic significance as a Midcentury Modern corporate campus designed by Edward B. Page with a landscape designed by Eckbo, Royston & Williams. The interpretive program should be developed in coordination with the archaeological program, which would likely include interpretation of the subject property's inclusion in the larger site of California Registered Landmark 760, Former Site of Laurel Hill Cemetery.

Although the site's past use as the Laurel Hill Cemetery was not part of the determination of historic significance under this evaluation of the historic architectural resource, the former use of the project site as a cemetery was studied in the Cultural Resources section of the initial study (see EIR Appendix B, pp. 125-135). The initial study includes Mitigation Measure M-CR-2a: Archaeological Testing, Monitoring, Data Recovery and Reporting, pp. 129-132; Mitigation Measure M-CR-2b: Interpretation, p. 133; and Mitigation Measure M-CR-4: Tribal Cultural Resources Interpretive Program, p. 135; which require testing, monitoring, and data recovery, and preparation of interpretive programs to document the former use of the site as a cemetery as well as to document subsurface tribal cultural resources.

Impact CR-2: The proposed project or project variant would not materially alter, in an adverse manner, the physical characteristics of any off-site historical resources that justify their inclusion in the California Register of Historical Resources. *(Less than Significant)*

As discussed under "Nearby Historic Resources Outside of the Project Site" on pp. 4.B.25-4.B.30, there is one historic resource on the block faces that border the project site: San Francisco Fire Station No. 10 at 655 Presidio Avenue. San Francisco Fire Station No. 10 is located directly southeast of the project site across Masonic Avenue. This two-story reinforced concrete building was constructed in 1955 as part of the 1952 Firehouse Bond Act (Bond Act). In 2010, a potential discontiguous historic district, tentatively named the San Francisco 1952 Firehouse Bond Act Thematic Historic District and composed of 20 firehouses including Station No. 10, was identified.

Due to its date of construction, architectural style, and integrity, Station No. 10 appears to contribute to the potential San Francisco 1952 Firehouse Bond Act Thematic Historic District. Despite its proximity to the corporate campus at the project site and its near simultaneous year of construction, the corporate campus and Station No. 10 have no contextual or architectural relationship. Additionally, while the two historic resources were constructed with one year of each other and are both generally designed in the Midcentury Modern architectural style, they express different interpretations of that broadly defined style. The fire station is more utilitarian in design. It includes areas of stucco cladding and a low-pitched roof with overhanging eaves, while the corporate campus reflects uniformly higher-style design and emphasizes horizontality through the use of a flat roof and extensive areas of continuous glazing. Finally, the fire stations that are included in the San Francisco 1952 Firehouse Bond Act Thematic Historic District are discontiguously located within a variety of urban contexts, and do not depend on any one specific type of setting in order to be able to convey their historic significance. Overall, the corporate campus at the project site and the fire station at 655 Presidio Avenue do not share a contextual or architectural relationship. Thus, changes to the corporate campus at the project site would not have an impact on the historic significance of the fire station.

Broadening the scope of review to include historic resources located within a one-block radius of the project site, there are eight properties that are considered individual historic resources by the planning department. These properties are 2908-2910 Bush Street, 2905 Bush Street, 2909 Bush Street, 2911 Bush Street, 2913-2915 Bush Street, 2945-2947 Bush Street, 2690 Geary Boulevard, and 3407-3421 Sacramento Street. In addition to the adjacent potential California Register-eligible Laurel Village Shopping Center, there are also two California Register-eligible districts located near the project site, slightly outside of a one-block radius: the eligible California Street Historic District and the eligible Presidio Heights Historic District.

None of these nearby historic resources has a contextual or architectural relationship with the Midcentury Modern corporate campus at the project site. The proposed project would be visible from the Laurel Heights Shopping Center, but its visibility would not have any impact on the potential historic significance of the shopping center. New construction within the project site would be contemporary in design and materials and would not convey a false sense of historic development. The character-defining features and form of nearby historic architectural resources would continue to be clearly evident from surrounding streets. In addition, the significance of nearby historical resources and potential historical resources (like the Laurel Village Shopping Center) is not premised on their having a cohesive functional, design, or visual relationship with the existing project site.

For these reasons, the proposed project or project variant would not demolish or materially alter in an adverse manner the physical characteristics of these nearby historical or potentially historical resources that convey their historical significance and that justify their eligibility for inclusion in the California Register. No mitigation measures are necessary.

CUMULATIVE IMPACTS

Impact C-CR-1: The impacts of the proposed project or project variant, in combination with other past, present, and reasonably foreseeable future projects, would not materially alter, in an adverse manner, the physical characteristics of historical resources that justify their eligibility for inclusion in the California Register of Historical Resources, resulting in a cumulative impact. ***(Less than Significant)***

Cumulative land development and transportation projects that are within an approximately quarter-mile radius of the project site are described in Section 4.A, Introduction to Chapter 4, p. 4.A.7, and are shown on Figure 4.A.1: Cumulative Projects, p. 4.A.12. Transportation infrastructure projects are not considered in the cumulative analysis because there are no historic resources in the public rights-of-way that would be affected by implementation of the Laurel Heights/Jordan Park Traffic Calming Project, the California Laurel Village Improvement Project, the Geary Bus Rapid Transit Project, Muni Forward, or the Masonic Avenue Streetscape Project.

Discussed below are potential cumulative effects on the significance of the following historic resources, or potential historic resources: the 3333 California Street project site; nearby offsite historical resources; and Midcentury Modern commercial buildings collectively as a resource type in San Francisco.

The cumulative projects within the vicinity of the project site (at 2670 Geary Boulevard, 2675 Geary Boulevard, and 726 Presidio Avenue [to the south and east] and 3700 California Street [to the west]) would have no impact on the historic and architectural significance of the project site due to distance (i.e., these cumulative land development projects would not be implemented on the same or adjacent project site) and the fact that historically associated structures or landscape features are not present on these project sites. Rather, the significant material impairment of the 3333 California Street historical resource would result only from the proposed project or project variant itself, as discussed above under Impact CR-1. Thus, the proposed project's or project variant's impact on the 3333 California Street historical resource would not combine with those of related past, present or reasonably foreseeable future projects and no significant cumulative impact on the resource would result.

Implementation of the cumulative projects within the vicinity of the project site (at 2670 Geary Boulevard, 2675 Geary Boulevard, and 726 Presidio Avenue [to the south and east]) would not result in direct or indirect significant cumulative impacts on off-site historic architectural resources identified above on pp. 4.B.25-4.B.30 because these cumulative projects are not adjacent to any of the off-site historic architectural resources identified within the vicinity of the project site. Furthermore, there are no historic architectural resources present on the sites of the cumulative projects. However, there are known historic architectural resources on the 3700 California Street project site that date back to the early 19th century. Any potential historic architectural resource impacts resulting from implementation of the 3700 California Street project (to the west of the 3333 California Street project site) would be evaluated as part of its project-level review and would likely not combine with other cumulative projects to result in a significant cumulative impact to other off-site historic architectural resources not identified above on pp. 4.B.25-4.B.30. As discussed above under Impact CR-2, the proposed project or project variant would not contribute to any direct physical impacts on other off-site historic architectural resources in the vicinity. The proposed project or project variant could be visible from nearby off-site historic architectural resources; however, the integrity and historic significance of nearby off-site historic architectural resources is not premised on their possessing an intact and cohesive functional or visual relationship with the existing project site or the project site of the cumulative projects in the vicinity. As such, the impacts of the proposed project or project variant on the significance of the Midcentury Modern corporate campus at 3333 California Street would not combine with those of other past, present or reasonably foreseeable future projects to make a significant cumulative impact on historic architectural resources in the vicinity.

The proposed project or project variant would not make a cumulatively considerable contribution to a significant impact resulting from a larger collective loss of Midcentury Modern commercial resources from past, present, or future projects in San Francisco. The *San Francisco Modern Architecture and Landscape Design 1935 – 1970 Historic Context Statement* was developed by the planning department to provide the framework for consistent, informed evaluations of San Francisco's Modern buildings and landscapes. The context statement links specific property types to identified themes, geographic patterns, and time periods; identifies character-defining features of Modern architectural and landscape design; and documents significance, criteria considerations, and integrity thresholds. The context statement identifies 12 examples of Modern corporate designed landscapes in San Francisco, most of which are located downtown or in other eastern neighborhoods including Chinatown and Fisherman's Wharf, as well as Japantown. The designed landscape at 3333 California Street is not included on this list.[28] The context statement also identifies Midcentury Modern as the most common Modern style built in San Francisco between 1945 through 1970. In addition, unlike contributors to a contiguous historic district, the integrity and collective historic significance of Midcentury Modern commercial buildings throughout San Francisco is not premised on their possessing an intact and cohesive functional or visual relationship with each other or the existing project site. The proposed project or project variant would not materially impair the ability of remaining Midcentury Modern commercial buildings to continue to convey their individual and collective significance as exemplars of the Midcentury Modern commercial building type.

For these reasons, the impact of the proposed project or project variant on historical resources would not combine with those of past, present, and reasonably foreseeable future projects to result in a significant cumulative impact on historical resources. No mitigation measures are required.

[28] Mary Brown, San Francisco Planning Department, *San Francisco Modern Architecture and Landscape Design 1935 – 1970 Historic Context Statement*, February 2011, p. 4, http://commissions.sfplanning.org/hpcpackets/2011.0059U.pdf, accessed March 18, 2018.

C. TRANSPORTATION AND CIRCULATION

Section 4.C, Transportation and Circulation, addresses the impacts that transportation and land use changes related to the 3333 California Street Mixed-Use Project would have on vehicle miles traveled, traffic hazards, transit, pedestrians, bicycles, loading, and emergency vehicle access, as well as the transportation-related impacts of construction activities. Each of these transportation subtopics is considered in the discussions of existing conditions; baseline plus project conditions; and year 2040 cumulative conditions. This section describes existing transportation conditions on the project site and in the transportation study area, and presents the baseline transportation conditions against which project impacts are measured. The baseline scenario includes planned development and infrastructure projects that were either under construction or approved and funded for construction at the end of September 2017 and will be completed prior to operation of the proposed project or Walnut Building Variant (project variant). Project-specific impacts are presented for both the proposed project and the project variant, and mitigation measures, if any, are identified when feasible. A cumulative impact discussion is presented for each transportation mode. The cumulative scenario includes approved or proposed projects with uncertain development timelines and reasonably foreseeable transportation network improvements and forecast growth in jobs and employment in San Francisco by 2040. While parking is no longer considered in determining if a project has the potential to result in significant environmental impacts, this section presents the proposed project's and project variant's parking demand in relation to the proposed parking supply. This information is used to analyze secondary impacts of parking.

The analysis uses methods consistent with the 2002 San Francisco Transportation Impact Analysis Guidelines for Environmental Review (SF Guidelines) and San Francisco Planning Commission Resolution No. 19579[1], adopted on March 3, 2016. Planning Commission Resolution No. 19579 removes automobile delay as described solely by level of service (LOS) or similar measure of vehicular capacity or traffic congestion as a factor in determining significant transportation impacts on the environment, pursuant to the California Environmental Quality Act (CEQA). The resolution replaces automobile delay with vehicle miles traveled criteria, which are designed to promote the reduction of greenhouse gas (GHG) emissions, the development of multimodal transportation networks, and a diversity of land uses, consistent with proposed and forthcoming changes to the CEQA Guidelines by the Office of Planning and Research, as mandated by Senate Bill 743.

[1] San Francisco Planning Department, 2016. *Executive Summary: Resolution Modifying Transportation Impact Analysis*. Hearing date: March 3, 2016.

ENVIRONMENTAL SETTING

TRANSPORTATION STUDY AREA

The project site is a 10.25-acre parcel bounded by California Street to the north, Presidio Avenue to the east, Masonic Avenue to the southeast, Euclid Avenue to the south, and Laurel Street/Mayfair Drive to the west in San Francisco's Presidio Heights neighborhood. The project site is located within Superdistrict 2 (see Figure 4.C.1: Transportation Study Area and Study Intersections).[2] The transportation study area for the proposed project and project variant consists of the area bounded by Geary Boulevard, Presidio Avenue, Sacramento Street, and Spruce Street. The project location and site characteristics are described in Chapter 2, Project Description, pp. 2.12-2.18. The existing land use setting is described in Section 4.A, Introduction to Chapter 4, pp. 4.A.13-4.A.17.

The transportation study area includes all aspects of the transportation network within generally two blocks of the project site that may be substantially affected by trips generated by the proposed project or project variant. 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.

A total of 13 existing intersections within the transportation study area were identified as key locations that are likely to be affected by the proposed project or project variant. These study intersections are identified by number in Table 4.C.1: Study Intersections, p. 4.C.4, and shown on Figure 4.C.1: Transportation Study Area and Study Intersections. As part of the transportation technical analysis, observations or counts, including vehicle counts, were collected at these intersections, existing site driveways, and nearby sidewalks in December 2016, April 2017, and July 2017.[3] Intersections farther away were not analyzed as part of the study because project-generated travel remaining on local streets would be dispersed, and, consequently, the proposed project or project variant effects would be relatively small.

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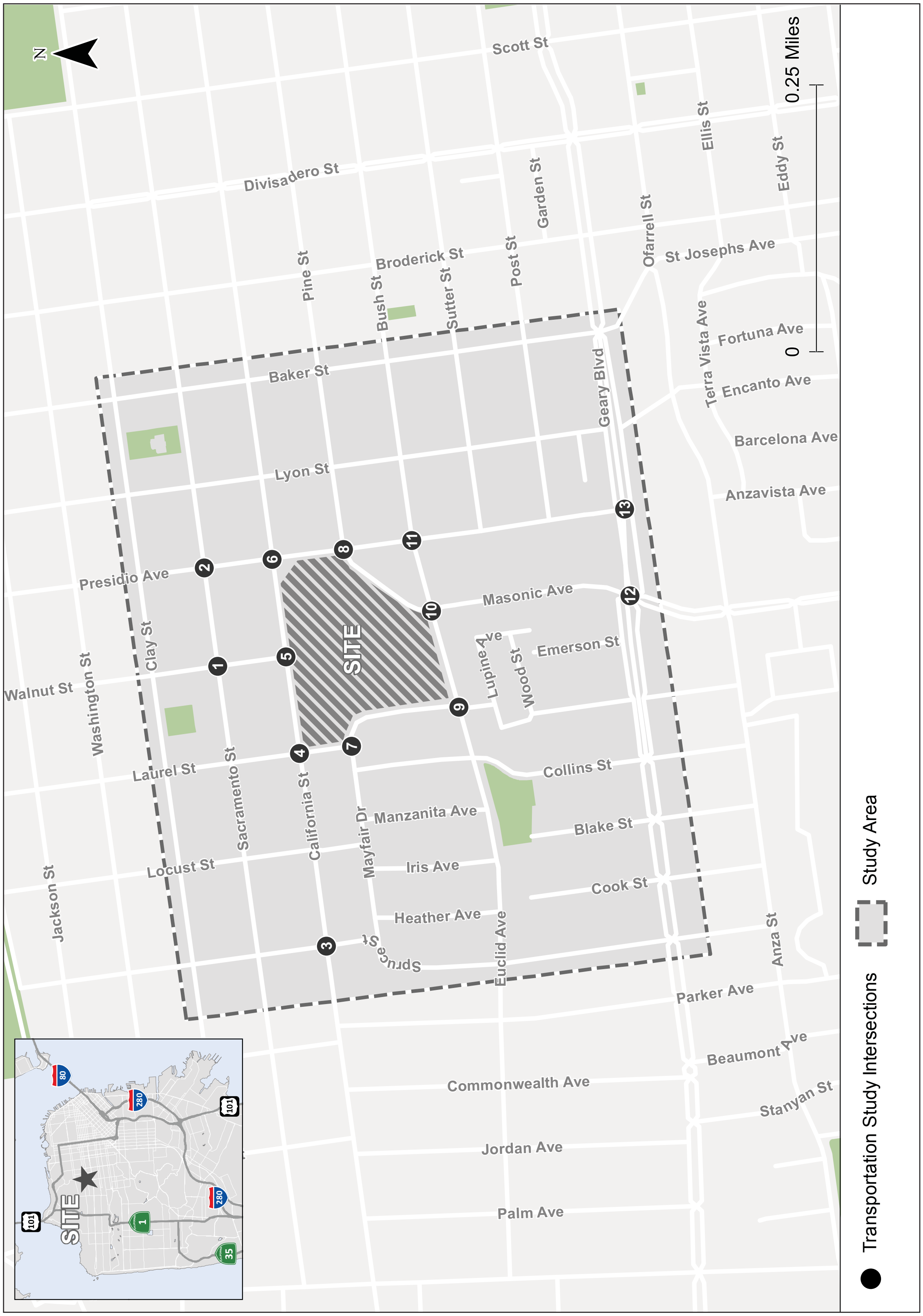
2 San Francisco is divided into four superdistricts, or geographic areas. Superdistrict 1 is the northeast quadrant, Superdistrict 2 is the northwest quadrant, Superdistrict 3 is the southeast quadrant, and Superdistrict 4 is the southwest quadrant.

3 A draft report by the San Francisco County Transportation Authority, *TNCs & Congestion* (October 2018) studied the factors that increased congestion between 2010 and 2016. The existing transportation conditions analysis for this EIR relies on data collected consistent with or subsequent to the later period in the *TNCs & Congestion* report. Transportation network company vehicles that passed through study area intersections during the collection period are included in the counts and thus are included as part of the existing conditions.



SOURCE: Kittleson & Associates

3333 CALIFORNIA STREET MIXED-USE PROJECT

2015-014028ENV

FIGURE 4.C.1: TRANSPORTATION STUDY AREA AND STUDY INTERSECTIONS

Table 4.C.1 Study Intersections

Number	Intersection	Existing Traffic Control
1	Sacramento Street / Walnut Street	All Way Stop Control
2	Sacramento Street / Presidio Avenue	Signal
3	California Street / Spruce Street	Signal
4	California Street / Laurel Street	Signal
5	California Street / Walnut Street	Signal
6	California Street / Presidio Avenue	Signal
7	Mayfair Drive / Laurel Street	All Way Stop Control
8	Presidio Avenue / Masonic Avenue / Pine Street	Signal
9	Euclid Avenue / Laurel Street	All Way Stop Control
10	Masonic Avenue / Euclid Avenue	Signal
11	Presidio Avenue / Euclid Avenue / Bush Street	Signal
12	Geary Boulevard / Masonic Avenue	Signal
13	Geary Boulevard / Presidio Avenue	Signal

Source: Kittelson & Associates, Inc. 2017

EXISTING CONDITIONS

Roadway Facilities

The study area is served by multiple local streets that provide access to the project site. Table 4.C.2: Roadway Facilities in the Study Area lists local and regional roadways in the study area by street name, direction (east-west or north-south), number of travel lanes, the streets' designation in the San Francisco General Plan (general plan), the streets' classification in the San Francisco Better Streets Plan (better streets plan), transit routes that use the street (if any), and bicycle facilities provided on the street (if any).

Local Roadways

Local access to the project site and study area is provided by an urban street grid network. California Street is the main east-west street in the study area that provides direct access to the project site. Direct access to the project site is also available from Euclid Avenue, Masonic Avenue, Presidio Avenue, Walnut Street, and Laurel Street. Each of the roadways provides on-street parking and sidewalks.

Regional Roadways

Regional access to the study area is provided by Interstate 80 (I-80) and U.S. Highway 101 (U.S. 101). I-80 provides the primary regional access to the project site from the East Bay to San Francisco where it becomes U.S. 101. The San Francisco-Oakland Bay Bridge is part of I-80 connecting San Francisco with the East Bay. Access to the project site from I-80 is via a variety of surface street options, including routes via the Oak Street/Fell Street couplet to/from South of Market on-/off-ramps at both Fifth and Eighth streets.

Table 4.C.2 Roadway Facilities in the Study Area

Street Name	Direction	Number of Lanes (typical) NOTE A	General Plan Designation	Better Streets Plan Classification	Transit Routes NOTE B	Bicycle Facilities (typical) NOTE C
Presidio Avenue	N-S	2	CMP and MTS Major Arterial	Neighborhood Commercial and Neighborhood Residential	2, 3, 43, 31BX, 38BX	Class III
Walnut Street	N-S	1	-	Neighborhood Residential	3	-
Masonic Avenue	N-S	3/2 NOTE D	CMP Arterial	Commercial Throughway and Residential Throughway	31AX, 31BX, 38AX, 43, NX	Class III
Laurel Street	N-S	1	-	Neighborhood Residential	-	-
Sacramento Street	E-W	1	-	Neighborhood Commercial	3, 33	-
California Street	E-W	2	CMP Arterial, MTS Primary Transit Oriented Street, Secondary Transit Street	Commercial Throughway and Residential Throughway	1, 1AX, 1BX, 2, 3	-
Pine Street	E-W	2	CMP and MTS Major Arterial	Residential Throughway	1AX, 31AX, 31BX, 38AX, 38BX, NX-	-
Euclid Avenue	E-W	4		Neighborhood Residential	-	Class II
Bush Street	E-W	3	CMP and MTS Major Arterial	Commercial Throughway and Residential Throughway	1AX, 31AX, 31BX, 38AX, 38BX, NX	-
Geary Boulevard	E-W	3	CMP Arterial, MTS Transit Preferential Street, Neighborhood Commercial Street	Commercial Throughway	31AX, 38, 38BX, 38R, NX	-

Notes: CMP = Congestion Management Plan. MTS = Metropolitan Transportation System. The descriptions associated with each street (General Plan Designation, Better Streets Plan Classification, Transit Routes, etc.) are those that apply to some portion of the street near the project site and may not apply to the entire length of the street.

[A] Number of lanes per direction.

[B] Transit routes listed include lines that operate on streets within the study area but do not have stops within the study area (i.e., 1AX, 31AX, 38AX, NX).

[C] Class I bikeways are bike paths with exclusive right-of-way for use by bicyclists. Class II bikeways are on-street bike lanes striped within the paved areas of roadways. Class III bikeways are signed bike routes. Class IV bikeways are on-street bike lanes that are protected from adjacent vehicular travel lanes by vertical separation such as curbs or soft-hit posts.

[D] Three southbound lanes from Pine Street to Euclid Avenue, two lanes in each direction south of Euclid Avenue.

Source: Kittelson & Associates, Inc. 2017; San Francisco General Plan; San Francisco Better Streets Plan

U.S. 101 provides regional access to both the north and south of San Francisco. Within the northern part of San Francisco, U.S. 101 operates on surface arterial streets (Van Ness Avenue, Lombard Street, and Richardson Avenue) until it reaches the Golden Gate Bridge. U.S. 101 connects San Francisco to the North Bay via the Golden Gate Bridge and East Bay via I-80 and the San Francisco-Oakland Bay Bridge. Within the eastern part of San Francisco, U.S. 101 provides freeway access to the Peninsula/South Bay, and connects to the East Bay via I-80. Access to and from the freeway segments of U.S. 101 from the project site is available from multiple routes, including a southern route via Masonic Avenue to the Oak Street/Fell Street couplet, with a connection to the U.S. 101 freeway via Octavia Boulevard. The freeway segments of U.S. 101 can also be accessed via Geary Boulevard and the Franklin Street/Gough Street couplet that connects with on-/off-ramps on South Van Ness Avenue.

Background Vehicle Miles Traveled in San Francisco and Bay Area

Many factors affect travel behavior. These factors include density, diversity of land uses, design of the transportation network, access to regional destinations, distance to high-quality transit, development scale, demographics, and transportation demand management.[4] Typically, low-density development at great distance from other land uses, located in areas with poor access to nonprivate vehicular modes of travel, generates more automobile travel compared to development located in urban areas, where a higher density, mix of land uses, and travel options other than private vehicles are available.

Given these travel behavior factors, San Francisco has a lower average vehicle miles traveled (VMT)[5] ratio than the nine-county San Francisco Bay Area region (hereinafter, the region). In addition, and for the same reasons, different areas of the City have different VMT ratios and some areas of the City have lower VMT ratios than others.

These geographic-based differences in VMT that are associated with different parts of the City and region are identified in transportation analysis zones (TAZs). TAZs are subdivisions of census tracts. There are 981 TAZs within San Francisco that vary in size from single city blocks in the downtown core, to multiple blocks in outer neighborhoods, to even larger geographic areas in historically industrial areas like the Hunters Point Shipyard. TAZs are used by planners as part of transportation planning models for transportation analysis and other planning purposes. All VMT data presented in this section are derived from the San Francisco Chained Activity Model Process (SF-CHAMP) travel demand model.

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4 California Smart-Growth Trip Generation Rates Study, Appendix A, University of California, Davis Institute of Transportation Studies, March 2013.

5 VMT data is expressed as a ratio which compares how many vehicle miles residents, employees, or visitors travel on a daily basis. Information on VMT per capita or per employee is referred to as a VMT ratio.

The project site comprises most of the area in TAZ 709, which is the area generally between Laurel/California streets, Presidio Avenue/California Street, Presidio/Euclid avenues and Laurel Street/Euclid Avenue. The project site is located close to major transit services and facilities, bicycle and pedestrian networks and facilities, and a diversity and density of land uses. A project located in TAZ 709 would have substantially reduced vehicle trips and shorter vehicle distance, and thus reduced VMT, compared to other areas of the region. This is demonstrated by comparing data on the average VMT for residential, office, and retail uses in the region to data for the project-site-specific TAZ 709. The following VMT rates are identified for each by category of use:

> *Regional VMT:* For residential development, the regional average daily VMT per capita is 17.2. For office and retail development, regional average daily work-related VMT per employee is 19.1 and 14.9, respectively.[6] San Francisco neighborhoods typically exhibit the lowest 20 percent of VMT per capita in the region. Conversely, neighborhoods within cities such as Novato and Orinda exhibit the highest 20 percent of VMT per capita in the region.

> *TAZ 709 VMT:* The average VMT estimates for each use category in TAZ 709 are projected to be substantially lower than the regional value. For residential development, the TAZ 709 average daily VMT per capita is 7.3. For office and retail development, the TAZ 709 average daily VMT per capita (measured in terms of employees) is 10.1 and 8.3, respectively.

The San Francisco Transportation Authority (transportation authority) uses SF-CHAMP to estimate VMT by private automobiles and taxis for different land use types within individual TAZs. Travel behavior in SF-CHAMP is calibrated by transportation authority staff based on observed behavior from the California Household Travel Survey 2010-2012, census data regarding automobile ownership rates and county-to-county worker flows, and observed vehicle counts and transit boardings. SF-CHAMP uses a synthetic population, which is a set of individual actors that represents the Bay Area's actual population, who make simulated travel decisions for a complete day. The transportation authority uses a tour-based analysis for office and residential uses, which examines the entire chain of trips over the course of a day, not just trips to and from the project.

For retail uses, the transportation authority uses a trip-based analysis, which counts VMT from individual trips to and from the project (as opposed to the entire chain of trips). A trip-based

[6] Includes VMT estimated by residential, retail, and office uses within TAZ 709 which includes the project site and its current use as the UCSF Laurel Heights Campus.

approach is necessary for retail projects because a "tour" is likely to consist of trips stopping in multiple locations; summarizing tour VMT to each location would overestimate VMT.[7,8,9]

Table 4.C.3: Existing Daily Vehicle Miles Traveled per Capita presents a summary of the daily VMT per capita for the region, City, and TAZ 709, in which the project site is located.

Table 4.C.3: Existing Daily Vehicle Miles Traveled per Capita

Land Use	Bay Area Regional Average	Citywide Average	TAZ 709
Households (Residential)	17.2	7.9	7.3
Employment (Office)	19.1	8.8	10.1
Visitors (Retail)	14.9	5.4	8.3

Source: San Francisco Planning Department Transportation Information Map, accessed May 25, 2018

Transit Facilities

The project site is served by local transit provided by the San Francisco Municipal Railway (Muni), operated by the San Francisco Municipal Transportation Agency (SFMTA). Regional transit provides service to the East Bay via the Bay Area Rapid Transit rail service (BART), Alameda-Contra Costa Transit buses, and ferries; to the North Bay via Golden Gate Transit buses and ferries; and to the Peninsula and South Bay via Caltrain, BART, and San Mateo County Transit (SamTrans) buses. Figure 4.C.2: Existing Transit Network presents the local and regional transit routes in the transportation study area.

Local Transit

MUNI

Muni provides transit service within the City and County of San Francisco, including bus (diesel, bio-diesel/electric hybrid and electric trolley), light rail (Muni Metro), cable car, and electric streetcar lines. Table 4.C.4: Local Muni Operations summarizes Muni service characteristics for

7 To state another way: a tour-based assessment of VMT at a retail site would consider the 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 analysts to apportion all retail-related VMT to retail sites without double-counting.

8 Retail travel is not explicitly captured in SF-CHAMP; 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" purpose travel generated by Bay Area households. The denominator of employment (including retail; cultural, institutional, and educational; and medical employment; school enrollment, and number of households) represents the size, or attraction, of the zone for this type of "Other" purpose travel.

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

SOURCE: Kittleson & Associates

3333 California Street Mixed-Use Project

2015-014028ENV

FIGURE 4.C.2: EXISTING TRANSIT NETWORK

Table 4.C.4: Local Muni Operations

Route	Headways NOTE A		Hours of Operation	Neighborhoods Served by Route
	Weekday a.m. Peak Period (7 a.m. – 9 a.m.)	Weekday p.m. Peak Period (4 p.m. – 6 p.m.)		
1	4	5	5:20 a.m.-12:30 a.m.	Seacliff, Outer Richmond, Inner Richmond, Presidio Heights, Pacific Heights, Pacific Heights, Nob Hill, Chinatown, Financial District
1BX	7	15	6:45 a.m.-10 a.m. (inbound) 4:05 p.m.-7:00 p.m. (outbound)	Inner Richmond, Presidio Heights, Pacific Heights, Financial District
2	15	18	6:50 a.m.-7:15 p.m.	Inner Richmond, Presidio Heights, Pacific Heights, Western Addition, Financial District
3	15	18	6:35 a.m.-11:30 p.m.	Inner Richmond, Presidio Heights, Pacific Heights, Union Square, Financial District
31BX	10	15	6:40 a.m.-9:05 a.m. (inbound) 4:05 p.m.-7:00 p.m. (outbound)	Inner Richmond, Presidio Heights, Western Addition, Downtown/Civic Center, Financial District
33	15	15	6:00 a.m.-12:30 a.m.	Presidio Heights, Inner Richmond, Golden Gate Park, Haight Ashbury, Twin Peaks, Castro/Upper Market, Mission
38	8	8	24 hours	Financial District, Western Addition, Presidio Heights, Inner Richmond, Outer Richmond, Seacliff
38BX	10	15	6:45 a.m.-9:05 a.m. (inbound) 4:05 p.m.-7:00 p.m. (outbound)	Financial District, Downtown/Civic Center, Western Addition, Presidio Heights, Inner Richmond, Outer Richmond, Seacliff
38R	4	5	7:00 a.m.-9:15 p.m.	Financial District, Presidio Heights, Inner Richmond, Outer Richmond, Seacliff
43	9	11	5:15 a.m.-12:30 p.m.	Marina, Presidio, Pacific Heights, Presidio Heights, Western Addition, Inner Richmond, Haight Ashbury, Inner Sunset, Twin Peaks, West of Twin Peaks, Outer Mission, Ocean View, Excelsior, Crocker Amazon

Notes: Transit routes shown have a bus stop within one half of a mile of the project site. Lines 1AX, 31AX, 38AX, and NX operate on streets within the study area but do not have a stop within one half of a mile of the project site.

[A] Headway is scheduled time between buses, presented in minutes. Headways shown are an average headway for the corresponding peak-hour headway schedule.

Source: Muni, 2017; Kittelson & Associates, Inc. 2017

the Muni routes operating within the study area with bus stops located within one half of a mile of the project site. Muni operates ten bus lines with stops located within about one half of a mile of the project site (1 California, 1BX California 'B' Express, 2 Clement, 3 Jackson, 31BX Balboa 'B' Express, 33 Ashbury-18th, 38 Geary, 38BX Geary 'B' Express, 38R Geary Rapid, and 43 Masonic).

Muni bus stops for outbound (service away from downtown or to the south) routes are located at the northwest corner of California Street and Presidio Avenue for the 1 California, 2 Clement, 3 Jackson, and 43 Masonic, and at the northeast corners of California and Laurel streets for the 1 California and 2 Clement bus routes. Inbound bus stops (with service toward downtown or to the north) are located at the southeast corner of California and Laurel streets and the southwest corner of California Street and Presidio Avenue for the 1 California and 2 Clement bus routes, the northeast corner of California Street and Presidio Avenue for the 43 Masonic bus route, and the east side of Walnut Street mid-block between California and Sacramento streets for the 3 Jackson bus route.

In addition to local Muni operations, the SFMTA Presidio Division and Yard, a 5.4-acre site southeast of the project site, includes a bus storage and maintenance facility and administrative building. The Presidio Division and Yard is bounded by Geary Boulevard to the south, Masonic Avenue to the west, Euclid Avenue to the north, and Presidio Avenue to the east. In addition to the in-service buses operating within the transportation study area, out-of-service buses use streets adjacent to the project site (primarily California Street and Presidio Avenue) to access the yard.

Muni transit operations in the study area were evaluated using capacity utilization and screenlines. Capacity utilization relates the number of passengers per transit vehicle to the design capacity of that vehicle.

A capacity utilization analysis was conducted for the routes providing direct access to the project site based on each route's peak capacity utilization at its maximum load point. The maximum load point is the location where the route has its highest number of passengers relative to its capacity.

Ridership and capacity data were obtained from the SFMTA's automated passenger count database.[10]

Capacity utilization during the weekday a.m. and p.m. peak periods was determined at the maximum load point for each route serving the study area. The capacity per vehicle includes both seated and standing capacity, where standing capacity is between 30 and 80 percent of seated capacity (depending on the transit vehicle configuration). The capacity of a standard bus is 63 passengers per vehicle.

Table 4.C.5: Muni Directional Line Analysis – Existing Conditions presents the weekday a.m. and p.m. peak ridership and capacities for transit routes serving the study area for the Muni operations inbound (toward downtown) and outbound (away from downtown) directions.

[10] San Francisco Planning Department, *Transit Data for Transportation Impact Studies*, May 2015. The memorandum references SFMTA's 2013 automated passenger count data as a foundation for the baseline and cumulative analysis.

Table 4.C.5: Muni Directional Line Analysis – Existing Conditions

Muni Line	Weekday A.M. Peak Hour			Weekday P.M. Peak Hour		
	Ridership	**Capacity**	**Utilization**	**Ridership**	**Capacity**	**Utilization**
Northbound						
43 Masonic	318	378	84%	140	315	44%
Subtotal	*318*	*378*	*84%*	*140*	*315*	*44%*
Southbound						
43 Masonic	246	378	65%	215	315	68%
Subtotal	*246*	*378*	*65%*	*215*	*315*	*68%*
Eastbound						
1 California	735	945	78%	290	630	46%
1BX California 'B'	555	705	79%	-	-	-
2 Clement	240	315	76%	140	315	44%
3 Jackson	240	315	76%	135	315	43%
33 Ashbury-18th St	116	252	46%	136	252	54%
31BX Balboa 'B'	280	360	78%	-	-	-
38 Geary	480	806	60%	489	806	61%
38R Geary Rapid	862	1,025	84%	-	-	-
38BX Geary 'B'	245	270	**91**%	-	-	-
Subtotal	*3,753*	*4,993*	*75%*	*1,190*	*2,318*	*51%*
Westbound						
1 California	583	1,080	54%	857	1,080	79%
1BX California 'B'	-	-	-	245	344	71%
2 Clement	125	315	40%	240	315	76%
3 Jackson	105	315	33%	185	315	59%
31BX Balboa 'B'	-	-	-	164	344	48%
33 Ashbury-18th St	116	252	46%	108	252	43%
38 Geary	429	806	53%	640	940	68%
38R Geary Rapid	-	-	-	927	1,025	**90%**
38BX Geary 'B'	-	-	-	209	282	74%
Subtotal	*1,358*	*2,768*	*49%*	*3,575*	*4,897*	*73%*

Note: **Bold** indicates capacity utilization of 85 percent or greater. "-" indicates value not applicable due to lines not in service. Transit routes shown have a bus stop within one half of a mile of the project site. Lines 1AX, 31AX, 38AX, and NX operate on streets within the study area but do not have a stop within one half of a mile of the project site.

Source: San Francisco Planning Department, *Transit Data for Transportation Impact Studies*, May 2015. See EIR Appendix D for Transit Line Capacity Calculations

On routes running in a north-south alignment, northbound is typically inbound and southbound is typically outbound. On routes running in an east-west alignment, eastbound is typically inbound and westbound is typically outbound.

As shown in Table 4.C.5, passenger loads on individual Muni lines range from 33 percent (3 Jackson) to 84 percent (43 Masonic) of capacity during the weekday a.m. peak hour. Passenger loads on individual Muni lines range from 43 percent (33 Ashbury-18th St and 3 Jackson) to 90 percent (38R Geary Rapid) of capacity during the weekday p.m. peak hour. Only the 38R

Geary Rapid Muni route has a passenger load exceeding 85 percent utilization, which is SFMTA's standard maximum acceptable utilization, at its maximum load point during the weekday p.m. peak hour.

Existing local transit conditions in San Francisco are also assessed by analyzing screenlines. Screenlines are hypothetical lines that would be crossed by persons traveling between downtown San Francisco and its vicinity (Superdistrict 1) to or from other parts of San Francisco and the region (Superdistricts 2, 3, and 4). The project site is located in Superdistrict 2. Four screenlines – northeast, northwest, southwest, and southeast – have been established in downtown San Francisco to facilitate the analysis of potential impacts of projects on Muni service. Subcorridors have been established within each screenline.

Table 4.C.6: Muni Lines Displayed by Screenline and Corridor (p. 4.C.14) shows the groups of Muni routes in each of the downtown screenlines. Table 4.C.7: Muni Downtown Screenlines – Existing Conditions(p. 4.C.15) presents the ridership and capacity utilization at the maximum load point for the routes crossing the downtown screenlines during the weekday a.m. and p.m. peak periods. The capacity utilization calculation uses weekday a.m. data for the inbound direction and weekday p.m. data for the outbound direction to align with the peak directions of travel and ridership loads for the Muni system.

As shown in Table 4.C.7, most downtown screenlines/corridors operate below Muni's 85 percent capacity utilization standard at their maximum load points during the weekday a.m. and p.m. peak periods. The Southwest Screenline and the following corridors currently exceed 85 percent capacity utilization:

- Fulton/Hayes corridor (Northwest Screenline) – 90 percent utilization during the weekday p.m. peak hour
- Third Street corridor (Southeast Screenline) – 99 percent utilization during the weekday p.m. peak hour
- Subway Lines corridor (Southwest Screenline) – 102 percent utilization during the weekday a.m. peak hour
- Southwest Screenline – 94 percent utilization during the weekday a.m. peak hour

Regional Transit

Regional transit provides service to the East Bay via BART commuter rail service, Alameda-Contra Costa Transit (AC Transit) buses, and Water Emergency Transportation Authority (WETA) ferries; service to the North Bay via Golden Gate Transit (GGT) buses and ferries; and service to the Peninsula/South Bay via Caltrain, BART, and San Mateo County Transit (SamTrans) buses. Regional transit services are generally not within walking distance of the

Table 4.C.6: Muni Lines Displayed by Screenline and Corridor

Screenline / Corridor	Muni Line		
Northeast			
Kearny/Stockton	30 Stockton 30X Marina Express	41 Union 45 Union-Stockton	8X Bayshore Express
Other lines	F Market & Wharves	10 Townsend	12 Folsom-Pacific
Northwest			
Geary	38 Geary 38R Geary Rapid	38AX Geary A Express	38BX Geary B Express
California	1 California	1AX California A Express	1BX California B Express
Sutter/Clement	2 Clement	3 Jackson	
Fulton/Hayes	5 Fulton	21 Hayes	
Balboa	31 Balboa	31AX Balboa A Express	31BX Balboa B Express
Southeast			
Third Street	T Third Street		
Mission	14 Mission 14R Mission Rapid	14X Mission Express	49 Van Ness-Mission
San Bruno/Bayshore	8 Bayshore 8AX Bayshore A Express	8BX Bayshore B Express 9 San Bruno	9R San Bruno Rapid
Other lines	J Church 10 Townsend	12 Folsom-Pacific 19 Polk	27 Bryant
Southwest			
Subway lines	K Ingleside L Taraval	M Ocean View	N Judah
Haight/Noriega	6 Parnassus 7 Haight-Noriega	7R Rapid Haight-Noriega NX Judah Express	7X Noriega Express
Other lines	F Market & Wharves		

Note: As of February 2018, the 8X Bayshore Express has been modified to the 8 Bayshore.

Source: San Francisco Planning Department, *Transit Data for Transportation Impact Studies*, May 2015

project site but can be reached by bicycle or from various Muni lines (some requiring a transfer). The project site is about 3 miles northwest of the Civic Center UN Plaza BART/Muni Metro station, about 4 miles west of the San Francisco Ferry Building and the Temporary Transbay Terminal, and about 4 miles northwest of the Fourth and King Caltrain Station. Regional transit providers and service are described below.

CALTRAIN

Caltrain provides passenger rail service on the Peninsula between San Francisco and Downtown San Jose with several stops in San Mateo County and Santa Clara County. Some service is also available south of San Jose. Caltrain operates either local or express trains between 4:30 a.m. and midnight inbound (northbound) and 5:00 a.m. to midnight outbound (southbound). Caltrain service headways for Limited-Stop and Express ("Baby Bullet") trains during the weekday a.m.

Table 4.C.7: Muni Downtown Screenlines – Existing Conditions

Muni Screenline / Corridor	Weekday A.M. Peak Hour (Inbound)			Weekday P.M. Peak Hour (Outbound)		
	Ridership	Capacity	Utilization	Ridership	Capacity	Utilization
Northeast						
Kearny/Stockton	2,211	3,050	73%	2,245	3,327	68%
Other lines	538	1,141	47%	683	1,078	63%
Screenline Total	*2,749*	*4,191*	*66%*	*2,928*	*4,405*	*67%*
Northwest						
Geary	1,821	2,490	73%	1,964	2,623	75%
California	1,610	2,010	80%	1,322	1,752	76%
Sutter/Clement	480	630	76%	425	630	68%
Fulton/Hayes	1,277	1,680	76%	1,184	1,323	**90%**
Balboa	758	1,019	74%	625	974	64%
Screenline Total	*5,946*	*7,828*	*76%*	*5,519*	*7,302*	*76%*
Southeast						
Third Street	350	793	44%	782	793	**99%**
Mission	1,643	2,509	66%	1,407	2,601	54%
San Bruno/Bayshore	1,689	2,134	79%	1,536	2,134	72%
Other lines	1,466	1,756	84%	1,084	1,675	65%
Screenline Total	*5,147*	*7,193*	*72%*	*4,810*	*7,203*	*67%*
Southwest						
Subway lines	6,330	6,205	**102%**	4,905	6,164	80%
Haight/Noriega	1,121	1,554	72%	977	1,554	63%
Other lines	465	700	66%	555	700	79%
Screenline Total	*7,916*	*8,459*	***94%***	*6,435*	*8,418*	*76%*
Muni Screenlines Total	*21,758*	*27,671*	*79%*	*19,693*	*27,328*	*72%*

Note: **Bold** indicates capacity utilization of 85 percent or greater. Totals may not add up due to rounding.

Source: San Francisco Planning Department, *Transit Data for Transportation Impact Studies*, May 2015. See EIR Appendix D for Transit Line Capacity Calculations

and p.m. peak periods are 10 minutes to 40 minutes, depending on the type of train. The peak direction of service is southbound during the weekday a.m. peak period (7:00 a.m. to 9:00 a.m.) and northbound during the weekday p.m. peak period (4:00 p.m. to 6:00 p.m.). Local service is not provided during peak periods.

Caltrain provides service to the 22nd Street Station and terminates at the San Francisco Station at Fourth and King streets. Both stations can be accessed directly by Muni transit and are served by local, limited, and express Baby Bullet trains. The Fourth and King Street Caltrain station can be reached by bus from the project site (1 California, 2 Clement, or 3 Jackson) with a transfer to the 30 Stockton, 45 Union/Stockton, or 10 Townsend. Caltrain also provides service to the 22nd Street Station, located between Indiana Street and Pennsylvania Avenue. This station can be reached by bus from the project site (1 California, 2 Clement, or 3 Jackson) with a transfer to the 22 Fillmore.

BART

BART provides regional commuter rail service between San Francisco and the East Bay (Pittsburg/Bay Point, Richmond, Dublin/Pleasanton and Fremont), as well as between San Francisco and San Mateo County (Daly City, SFO Airport, and Millbrae). Weekday hours of operation are between 4 a.m. and midnight. During the weekday p.m. peak period, headways are 5 to 15 minutes along each line. Within San Francisco, BART operates underground along Market Street to Civic Center Station where it turns south through the Mission District towards Daly City, running partially aboveground between Glen Park and Daly City stations. The BART stations nearest to the project study area are the Civic Center/UN Plaza Station at Market Street/Hyde Street (2.6 miles via 38 Geary), the Montgomery Station at Market Street/Second Street (2.9 miles via 2 Clement, 3 Jackson, or 38 Geary), and the Embarcadero Station at Market Street/Main Street (3.2 miles via 1 California, 1BX California 'B' Express, or 2 Clement).

AC TRANSIT

AC Transit provides local bus service in western Alameda and Contra Costa Counties and has routes to San Francisco and San Mateo counties. The majority of AC Transit Transbay routes terminate at the Temporary Transbay Terminal located at Main Street and Folsom Street, approximately 3.5 miles east of the project site. This station can be reached by three Muni bus routes (2 Clement, 38R Geary Rapid, or 38 Geary) that operate near the project site.

Most Transbay bus lines are for peak period and peak direction (to San Francisco during the weekday a.m. peak period and from San Francisco during the weekday p.m. peak period), with headways of 15 to 30 minutes per route. The peak direction of service is into San Francisco during the weekday a.m. peak period and out of San Francisco during the weekday p.m. peak period.

WETA

WETA is a regional public transit agency that operates ferry services on San Francisco Bay and coordinates the water transit response to regional emergencies. The San Francisco Ferry Terminal is located about 3.2 miles east of the project site and can be reached by Muni bus routes (1 California, 1BX California 'B' Express, 2 Clement, 38BX Geary 'B' Express). WETA services operate from eight terminals in Alameda, Oakland, San Francisco, South San Francisco, and Vallejo. Ferry routes operate with 30- to 60-minute headways, depending on time and day of the week.

SAMTRANS

SamTrans provides bus service between San Mateo County and San Francisco. SamTrans operates three bus lines that serve downtown San Francisco. The closest SamTrans bus stops to the project site are located at the Temporary Transbay Terminal (Main Street/Folsom Street) and First Street/Mission Street. The Temporary Transbay Terminal can be reached by two Muni bus routes (2 Clement or 38 Geary). Route KX operates as a peak-only express route (Temporary Transbay Terminal), Route 292 provides service throughout the day (Temporary Transbay Terminal), and Route 397 operates as a late-night route (First Street/Mission Street). Headways during the weekday p.m. peak period are approximately 60 minutes for Route KX and 20 to 30 minutes for Route 292.

GOLDEN GATE TRANSIT

Golden Gate Transit, operated by the Golden Gate Bridge and Highway Transportation District, provides bus service between the North Bay (Marin and Sonoma counties) and San Francisco. It operates 22 commuter bus routes, 9 basic bus routes, and 16 ferry feeder bus routes (ferry feeder bus routes do not operate in San Francisco). Golden Gate Transit carries approximately 8,750 bus passengers per day total across the Golden Gate Bridge. Most bus routes serve either the Civic Center (via Van Ness Avenue and Mission Street) or the Financial District (via Battery and Sansome streets). Basic bus routes operate with 15- to 90-minute headways, depending on the time and day of the week. Commute and ferry feeder bus routes operate at intervals that are more frequent in the mornings and evenings. Commute bus Route 92, within the study area, provides service to and from Marin County via stops in both directions on Geary Boulevard between Masonic and Presidio avenues, approximately one half of a mile south of the project site.

REGIONAL TRANSIT SCREENLINES

As is the case for Muni, transit service into and out of San Francisco on regional service providers is examined using a screenline analysis. The existing regional transit screenlines, as described in the Transportation Impact Analysis Guidelines for Environmental Review (SF Guidelines), were used to analyze regional transit capacity in the study area. Table 4.C.8: Regional Screenlines – Existing Conditions presents the ridership and capacity utilization at the maximum load point for the regional screenlines during the weekday a.m. and p.m. peak periods. For regional operators, the maximum load point is typically at the San Francisco city limit (the East Bay maximum load point would occur at the Bay Bridge, the North Bay maximum load point would occur at the Golden Gate Bridge, and the South Bay maximum load point would occur at the southern city border). The capacity utilization calculation analyzes the weekday a.m. data for the inbound direction and weekday p.m. data for the outbound direction to align with the peak directions of travel and ridership loads for the regional operators.

Table 4.C.8: Regional Screenlines – Existing Conditions

Screenline/Operator	Weekday A.M. Peak Hour (Inbound)			Weekday P.M. Peak Hour (Outbound)		
	Ridership	Capacity	Utilization	Ridership	Capacity	Utilization
East Bay						
BART	25,399	23,256	**109%**	24,488	22,784	**107%**
AC Transit	1,568	2,829	55%	2,256	3,926	57%
Ferries	810	1,170	69%	805	1,615	50%
Screenline Total	*27,777*	*27,255*	***102%***	*27,549*	*28,325*	*97%*
North Bay						
GGT Bus	1,330	2,543	52%	1,384	2,817	49%
Ferries	1,082	1,959	55%	968	1,959	49%
Screenline Total	*2,412*	*4,502*	*54%*	*2,352*	*4,776*	*49%*
South Bay						
BART	14,150	19,367	73%	13,500	18,900	71%
Caltrain	2,171	3,100	70%	2,377	3,100	77%
SamTrans	255	520	49%	141	320	44%
Ferries	-	-	-	-	-	-
Screenline Total	*16,576*	*22,987*	*72%*	*16,018*	*22,320*	*72%*
Regional Screenlines Total	*46,765*	*54,744*	*85%*	*45,919*	*55,421*	*83%*

Note: **Bold** indicates capacity utilization of 100 percent or greater. "-" indicates value not applicable.

Source: San Francisco Planning Department. *Updated BART Regional Screenlines – Revised*, October 2016. See EIR Appendix D for Transit Line Capacity Calculations

For regional transit providers (except for BART), the established capacity utilization threshold is equal to the number of seated passengers per vehicle. For BART, the established capacity utilization threshold is 107 passengers per car, which includes all seats and accounts for some standees. All of the regional transit operators have a one-hour load factor standard of 100 percent, which would indicate that all seats are full. As such, the San Francisco Planning Department (planning department) uses 100 percent capacity utilization as a threshold of significance for determining peak period transit demand impacts on regional transit.

As shown in Table 4.C.8, the East Bay screenline and BART currently exceed the established capacity utilization standard:

- East Bay Screenline – 102 percent utilization during the weekday a.m. peak hour
- BART (East Bay Screenline) – 107 percent utilization during the weekday a.m. peak hour and 109 percent utilization during the weekday p.m. peak hour

All other regional screenlines and operators operate within established utilization standards.

OTHER TRANSIT SERVICE PROVIDERS

UCSF LAUREL HEIGHTS CAMPUS SHUTTLE

The UCSF Laurel Heights Campus is served by UCSF's free inter-campus shuttle service, which connects the Laurel Heights Campus to all the other UCSF Campus sites as well as to select secondary campus locations. UCSF's Tan and Black shuttle routes, which operate with 20-minute headways, access the project site via the California Street entrance, stop at the shuttle bus stop near the main entrance to the existing office building (along its north elevation), and exit via Laurel Street/Mayfair Drive.

COMMUTER SHUTTLES

The SFMTA Board unanimously approved a Commuter Shuttle Program on February 12, 2017. The Commuter Shuttle Program provides permits to eligible commuter shuttle operators (e.g., those provided by employers, educational institutions, medical facilities, and various companies/office buildings) to use a network of designated streets and stops.

No designated shared Muni/commuter shuttle stops are located in the study area.[11] California Street, Pine Street, Bush Street, Masonic Avenue, Geary Boulevard, and Presidio Avenue are designated unrestricted arterials in the shuttle network. Laurel Street and Mayfair Drive are designated restricted arterials (trucks over 3 tons prohibited) in the shuttle network.

CHARIOT

Chariot is a commuter shuttle and charter vehicle service that operates public and private routes in several neighborhoods of San Francisco. The company operates 14-seat passenger vans along specific fixed routes, operating during morning and evening commute hours only. Passengers can reserve a seat on public routes using a phone-based application. The public routes operate inbound toward downtown during the morning commute hours and outbound away from downtown during the evening commute hours. Chariot operates the following public routes with stops located within the study area:[12]

- California Dreamin 'A'. Departs every 10 to 15 minutes from 6:15 a.m. to 9:30 a.m. Monday through Friday. The bus travels eastbound along California Street during the morning period, with the nearest stop located at 3183 California Street east of Presidio Avenue, less than one block from the project site.

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[11] SFMTA, Commuter Shuttles Program Stop Locations & Permitted Streets, February 23, 2017. The "a.m. and p.m. hours" refer to the time periods as defined by the Commuter Shuttle Program, http://sfgov.maps.arcgis.com/apps/webappviewer/index.html?id=9fa72be4a92b449c92bcf832bb1da1f1, accessed December 26, 2017.

[12] Chariot, Commuter Shuttle Route Map, https://www.chariot.com/routes, accessed February 26, 2018.

- California Dreamin 'B'. Departs every 10 to 15 minutes from 6:00 a.m. to 9:30 a.m. Monday through Friday. The bus travels eastbound along California Street during the morning period, with the nearest stop located at 3183 California Street east of Presidio Avenue, less than one block from the project site.
- Geary Galloper. Departs every 6 to 10 minutes from 3:30 p.m. to 8:00 p.m. Monday through Thursday and from 3:30 p.m. to 7:00 p.m. on Friday. The bus travels westbound along California Street during the evening, with the nearest stop located at 3200 California Street in the white passenger loading zone west of Presidio Avenue, directly across from the project site.
- Richmond Racer. Departs every 7 to 12 minutes from 6:15 a.m. to 10:00 a.m. Monday through Friday. The bus travels eastbound along Geary Boulevard during the morning, with the nearest stop located at 2675 Geary Boulevard east of Masonic Avenue, about a quarter of a mile from the project site.
- Pacific Rush. Departs every 7 minutes from 6:15 a.m. to 10:00 a.m. Monday through Friday and every 10 to 20 minutes from 4:30 p.m. to 7:40 p.m. Monday through Thursday and from 3:30 p.m. to 7:00 p.m. on Friday. The bus travels eastbound along Jackson Street, Broadway, and California Street during the morning, with the nearest stop located at 2689 Jackson Street east of Scott Street, about three-quarters of a mile from the project site. The bus travels westbound along California Street, Broadway, and Jackson Street during the evening, with the nearest stop located at 427 Presidio Avenue north of California Street, less than one block from the project site.

In addition to these public routes, Chariot also operates a number of private charter routes, including the Helix Divisadero, which stops on Arguello Boulevard south of California Street and continues south to Redwood City. No other private routes have stops within 1 mile of the project site.

Pedestrian Facilities and Circulation

A qualitative evaluation of existing pedestrian conditions was conducted during field visits to the transportation study area in December 2016, April 2017, and July 2017. Pedestrian counts were collected in December 2016 during the weekday a.m. and weekday p.m. peak periods and are included in EIR Appendix D: Transportation and Circulation Calculation Details and Supporting Information.[13]

Observations of pedestrian facilities included sidewalks, crosswalks, and curb ramps and pedestrian activity within the study area. Observations indicated pedestrian facilities were generally complete in the study area, with sidewalks provided continuously on both sides of the streets. Sidewalks adjacent to the project site on California Street are 15 feet wide while those on Laurel Street and Presidio, Masonic, Euclid avenues are about 10 feet wide. The effective clear widths of the sidewalks vary depending on the presence of landscaping, utility poles, parking

[13] Pedestrian count data was collected during the weekday a.m. and p.m. peak hours (7 to 9 a.m. and 4 to 6 p.m.) on Thursday, December 1, 2016, Wednesday, January 13, 2016, and Thursday, August 8, 2017.

meters, and other street furniture, e.g., the trees along California Street reduce the effective sidewalk width from 15 feet to about 10 to 11 feet in most locations. In addition, a utility box and traffic signal cabinet on the southeast corner of California and Laurel streets and concrete planter box along the building edge reduce the effective sidewalk width to about 9 feet. The bus stop, bench, and newspaper racks on the southwest corner of California Street/Presidio Avenue also reduce the effective sidewalk width to about 9 feet. The streetlights and utility poles on Presidio Avenue south of California Street reduce the effective sidewalk width from 10 feet to about 4 feet in some locations.[14]

There are marked crosswalks (high visibility markings at California Street/Presidio Avenue, Masonic Avenue/Euclid Avenue, and Laurel Street/Euclid Avenue), and pedestrian countdown signals are provided at all signalized intersections adjacent to the project site. General pedestrian impediments observed across the study area include the following:

- Channelized right turns (slip lanes) at California Street/Presidio Avenue, Presidio Avenue/Pine Street, and Masonic Avenue/Euclid Avenue
- Use of shared diagonal curb ramps at intersection corners and curb ramps that do not conform with Americans with Disabilities Act standards
- Unmarked crossing on the north leg of Masonic Avenue/Presidio Avenue/Pine Street
- Unmarked crossing on the east leg of Laurel Street/Mayfair Drive

Particularly challenging areas for vehicles and pedestrians were observed at the intersection corners where channelized right-turn lanes were present (specifically, California Street/Presidio Avenue; Presidio Avenue/Pine Street; and Masonic Avenue/Euclid Avenue). Vehicles approaching these right turn lanes were observed to travel at high speeds and to not yield to pedestrians crossing to the pedestrian island.

Currently, the project site has limited pedestrian facilities with limited Americans with Disabilities Act accessible entry points due to the topography of the site. There is no sidewalk on the east side of the Walnut Street extension leading into the site from the main California Street/Walnut Street entrance. Similarly, sidewalks are only provided on one side of the Laurel Street driveways. There is one pedestrian-only access to the site provided from Euclid Avenue. All other pedestrian access points are shared or adjacent to vehicle access points.

Observations and counts show a higher level of pedestrian activity on the project's California Street frontage near the Walnut Street entrance (about 80 pedestrians during the weekday a.m. peak hour and 150 pedestrians during the weekday p.m. peak hour) than on the Laurel Street frontage (fewer than 30 pedestrians during the weekday a.m. and p.m. peak hours). Pedestrian activity along Masonic and Euclid avenues was minimal, with fewer than 20 pedestrians walking

[14] The Americans with Disabilities Act requires a minimum effective width of 4 feet for compliance.

along the sidewalk during the weekday a.m. and p.m. peak hours. Along California Street, people were observed walking to and from various retail stores and restaurants at Laurel Village Shopping Center, the Jewish Community Center of San Francisco, and transit stops in the area. Despite the lack of pedestrian facilities in some locations and the higher level of pedestrian activity along California Street versus other street frontages, overall the sidewalk facilities were observed to have capacity to accommodate the observed levels of pedestrian activity.

In 2014, San Francisco adopted a Vision Zero policy. The goal of the Vision Zero policy is to create a culture that prioritizes traffic safety and ensures that mistakes on roadways do not result in serious injuries or death. In 2015, the City released a pedestrian, cyclist, and vehicle high injury corridor report (the Vision Zero "High Injury Network") along with a two-year action strategy and new protocols for tracking traffic fatalities and improving the City's understanding of Vision Zero's impact. The project site is not located directly on the High Injury Network. However, the following street segments near the project site are identified as part of the High Injury Network:[15]

- California Street between Lyon and Scott streets
- Post Street between Lyon and Steiner streets
- Geary Boulevard between 31st Avenue and Steiner Street

Pedestrian collision data from the Statewide Integrated Traffic Reporting System (2005-2012) reported 16 pedestrian injury collisions and no pedestrian fatalities within 500 feet of the project site.[16]

Bicycle Facilities and Circulation

A qualitative evaluation of existing bicycle conditions was conducted during field visits to the transportation study area in December 2016, April 2017, and July 2017. Bicycle counts were collected in December 2016 and July 2017 during the weekday a.m. and weekday p.m. peak periods (7 to 9 a.m. and 4 to 6 p.m.) and are included in EIR Appendix D.[17]

Bicycle facilities are typically classified into four classes, primarily based on the level of separation from vehicular traffic.

- Class I bikeway (bike path) – This is a dedicated path for bicyclists and/or pedestrians that does not permit motorized travel. No class I bikeways exist in the study area.

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[15] San Francisco Department of Public Health, Vision Zero High Injury Network: 2017, http://sfgov.maps.arcgis.com/apps/webappviewer/index.html?id=fa37f1274b4446f1bdddd7bdf9e708ff, accessed May 25, 2018.

[16] San Francisco Planning Department, Transportation Information Map, www.sftransportationmap.org, accessed May 25, 2018.

[17] Bicycle count data was collected during the weekday a.m. and p.m. peak hours (7 to 9 a.m. and 4 to 6 p.m.) on Thursday, December 1, 2016 and Thursday, July 6, 2017.

- Class II bikeway (bike lane) – This is a portion of the roadway network that has been striped and signed for bicycle use. Implementation of class II bicycle facilities requires sufficient right-of-way between the vehicle stream and the curb or curbside parking. Bicycle lanes are typically used along collector or arterial streets with medium to high traffic volumes, providing additional travel space for bicyclists along busy roadway segments.
- Class III bikeway (bike route) – This is a bikeway that primarily serves to connect other facilities and destinations in the bikeway network. These routes include signage but do not have roadway markings or striping to indicate reserved space for the bicyclists. Bicyclists traveling on class III facilities must share travel lanes with vehicle traffic.
- Class IV bikeway (cycle track) – This is a dedicated, separated and protected on-street lane for bicyclists. Cycle tracks (or protected bike lanes) are typically used along streets with high traffic volumes and high speeds, providing additional protection for bicyclists through the use of vertical separation, such as concrete curb or safe-hit posts. No class IV bikeways exist in the study area.

Existing on-street bicycle facilities, as designated by the SFMTA Bike Network Map, are shown in Figure 4.C.3: Existing Bicycle Network and described below.[18]

- Presidio Avenue – Class III facility runs north-south between Lincoln Boulevard in the Presidio, turns on Geary Boulevard and continues along Masonic Avenue to Page Street.
- Arguello Boulevard – Class II facility runs north-south from Washington Street in the Presidio to John F. Kennedy Drive in Golden Gate Park. Class III facility runs east-west on Clay Street from Cherry Street to Webster Street and continues north-south on Webster Street to Broadway, where it continues east-west to The Embarcadero.
- Euclid Avenue – Class II facility from Arguello Boulevard to Masonic Avenue. The facility continues as a class III bike route for one block to connect with Presidio Avenue.
- Post Street – Class II facility runs east-west from Presidio Avenue to Steiner Street. The facility continues as a one-way westbound class III bike route between Steiner Street and Market Street.

Observations and counts show a low level of bicycle activity on streets adjacent to the project site. Bicycle activity was observed to be highest along Presidio Avenue (class III facility), with 12 trips recorded during the weekday p.m. peak hour.

Bicyclists may avoid the streets immediately adjacent to the project site due to various conditions including, but not limited to, higher traffic volumes and vehicle speeds, presence of transit, lack of dedicated bicycle facilities, and topography. In addition, the population and land use density of the area is lower in the study area compared to other areas of the City with higher bicyclist activity. During the observation periods, the potential for conflicts between transit vehicles and

[18] SFMTA, San Francisco Bike Network Map, July 2016, https://www.sfmta.com/maps/san-francisco-bike-network-map, accessed May 25, 2018.

SOURCE: Kittleson & Associates

3333 CALIFORNIA STREET MIXED-USE PROJECT

2015-014028ENV

FIGURE 4.C.3: EXISTING BICYCLE NETWORK

bicycles was greatest when buses pulled in/out of the bus stops. Other curbside activities such as freight loading, taxi and general passenger boarding were observed to have the potential for conflicts for bicyclists along California Street and Presidio Avenue, although no actual conflicts were observed.

Bike Share Facilities

In 2013, Bay Area Bike Share was launched as a pilot program throughout the Bay Area to test the viability of a regional bike share system. The bike share system is operated by the firm Motivate, and service expansion is being supported through a 10-year sponsorship from Ford. The re-branded Ford GoBike bike share system will provide 7,000 bikes across San Francisco, the East Bay, and San Jose by 2019. According to the latest expansion map, additional stations are expected in the project study area in 2018.[19]

The nearest existing station (24 docks) is located at Divisadero Street/O'Farrell Street, which is approximately 1.1 miles southeast of the project site and located outside the study area.

Freight Loading

There are no existing designated on-street freight loading zones (yellow zones) on the streets bordering the project site. Off-street freight loading for the existing use occurs within the designated loading areas on the west portion of the project site with access from California Street and Laurel Street and within the existing garage with access from Presidio Avenue. Truck deliveries generally occur within the off-street freight loading dock (see Chapter 2, Project Description, Figure 2.2: Existing Site, p. 2.4). As shown in Figure 2.2, the loading area can be accessed from either driveway on Laurel Street or from California Street/Walnut Street intersection.

Passenger Loading

Passenger loading activity data was collected on site at Bright Horizons, the existing daycare use on the project site, and at the Jewish Community Center of San Francisco on July 6, 2017, during the weekday a.m. and weekday p.m. peak periods (7 to 9 a.m. and 4 to 6 p.m.). Data are included in EIR Appendix D.[20]

The Bright Horizons University Child Care Center at Laurel Heights operates Monday through Friday from 6:30 a.m. to 6:00 p.m. and offers full- and part-time daycare and education to children ages 6 weeks to 6 years. There are four existing off-street parking spaces reserved for

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[19] Ford GoBike San Francisco Expansion Map, https://d21xlh2maitm24.cloudfront.net/fgb/san-francisco.jpg?mtime=20170523174220, accessed May 25, 2018.

[20] Passenger loading count data was collected during the weekday a.m. and p.m. peak hours (7 to 9 a.m. and 4 to 6 p.m.) on Thursday, July 6, 2017.

daycare center drop-off and pick-up within the upper surface parking lot accessible from Laurel Street, near Euclid Avenue. All other parking spaces are reserved for UCSF permit holders or require payment weekdays between 8 a.m. and 9 p.m. Drop-off and pick-up for the existing Bright Horizons day care occurs within this lot. Staff were not observed to assist with pick-up or drop-off activities. Driveway counts and observations of the drop-off and pick-up activities show about 40 people dropped off children between 7 a.m. and 8 a.m. with an average drop-off dwell time of 5 minutes 44 seconds. About 40 people were observed to pick up children from the daycare center between 5 p.m. and 6 p.m. with an average pick-up dwell time of 13 minutes 5 seconds.

Because of the flexible hours of the day care, drop-offs and pick-ups were staggered and queues were not observed to develop. On occasions when all four designated drop-off/pick-up spaces were occupied, people used available parking spaces for passenger loading/unloading. During the weekday a.m. period, people were observed to stop and drop off their child while stopped in the drive aisle on four separate occasions. During the weekday p.m. period, nine internal roadway blockages were observed. These blockages occurred on the project site, within the parking lot, and lasted for an average duration of less than 30 seconds each. The blockages (or double-parking) did not cause queues to develop on-street during either time period.

Drop-off and pick-up for the Jewish Community Center of San Francisco occurs within the approximately 280-foot-long passenger loading zone on the north side of California Street, directly across from the project site. The passenger loading zone can accommodate about 14 vehicles (one passenger car per 20 feet). During field observations, Jewish Community Center staff were observed to assist with and monitor drop-off and pick-up activities.

During the peak hour of passenger loading activity (4 to 5 p.m.), approximately 40 vehicles used the curbside loading zone with a typical dwell time of around 40 seconds. On five occasions over the two-hour evening observation period, when the passenger loading zone was fully occupied, drivers were observed to pick-up their passenger while stopped in the roadway. On three occasions during the morning observation period and one occasion during the evening observation period, drivers were observed to stop in the bus zone and conduct passenger loading/unloading. No buses arrived when people were stopped in the bus zone. However, drivers in the rightmost travel lane attempting to access the passenger loading zone were observed to bypass and delay buses attempting to re-enter the travel lane. Passenger loading activity associated with the Jewish Community Center was observed to result in re-entry delay (less than 30 seconds) for two buses traveling westbound along California Street during the weekday p.m. peak hour of passenger loading activity.

Emergency Access

There are three fire stations located within a 2-mile radius of the project site. The closest fire station (San Francisco Fire Station No. 10) is located at 665 Presidio Avenue, across Masonic Avenue from the project site. Fire vehicles enter and exit the fire station from Presidio Avenue, between the intersections of Presidio Avenue/Masonic Avenue/Pine Street and Presidio Avenue/Euclid Avenue/Bush Street. San Francisco Fire Station No. 38 is located about 1 mile east of the project site at 2150 California Street. San Francisco Fire Station No. 5 is located about 1 mile southeast of the project site at 1301 Turk Street.[21]

There are two police stations located within a 2-mile radius of the project site. The closest police station (Richmond Police Station) is located at 461 Sixth Avenue, 1.3 miles southwest of the project site. The Northern District Police Station is located about 1.5 miles southeast of the project site at 1125 Fillmore Street.

The project site is located about a quarter of a mile east of the California Pacific Medical Center (California Campus) at 3700 California Street, one half of a mile north of Kaiser Permanente Medical Center at 2425 Geary Boulevard, and less than 1 mile west of the UCSF Medical Center at Mount Zion.

Emergency vehicles typically use major streets to access the study area when heading to and from an emergency or emergency facility. Arterial roadways allow emergency vehicles to travel at higher speeds and provide enough clearance space to permit other vehicles to maneuver out of the path and yield right-of-way to the emergency vehicle. Direct emergency vehicle access to the project site is currently provided from all frontages – California Street, Presidio Avenue, Masonic Avenue, Euclid Avenue, and Laurel Street. All streets providing direct access to the site are wide enough to provide adequate access for emergency vehicles. No traffic operational issues were observed related to emergency vehicle access.

BASELINE CONDITIONS

Baseline Projects for Operational Impacts

The analyses in CEQA documents typically present the existing environmental setting as the baseline conditions against which the project conditions are compared to determine whether an impact is significant. However, in the study area, some land use development projects are either recently occupied or under construction, and some transportation infrastructure projects are

[21] San Francisco Fire Station No. 5 is being reconstructed as part of the June 2010 Earthquake Safety & Emergency Response Bond, http://www.sfearthquakesafety.org/firestation5.html, accessed December 26, 2017. Fire Station No. 5 is scheduled to reopen in December 2018. Fire service will be uninterrupted during construction, relying on the deployment of apparatus and personnel from nearby Fire Station No. 6 (135 Sanchez Street) and Fire Station No. 38 (2150 California Street).

approved/funded. Because these projects will be complete by the time the proposed project or project variant is operational, the transportation analyses provide baseline conditions that take these conditions into account. Using an existing plus project transportation analysis would not accurately reflect the conditions that will exist at the time the proposed project's or project variant's impacts would actually occur; therefore, a baseline plus project conditions transportation analysis was used to provide a more accurate and conservative analysis. The projects that are taken into account in the baseline conditions, in addition to existing projects and transportation infrastructure projects, are as follows:[22]

- 800 Presidio Avenue (Case No. 2006.0868E). This project involves demolishing/ reconstructing the Booker T. Washington Community Service Center and constructing 50 units of affordable housing.[23]
- 2675 Geary Boulevard (Case No. 2015.007917). This project involves replacing 57 parking spaces and increasing retail square footage on the shopping center property by 17,120 square feet, from 206,897 sf to 224,017 square feet.
- Masonic Avenue Streetscape Project[24,25]
- California Laurel Village Improvement Project[26]
- Laurel Heights/Jordan Park Traffic Calming Project[27]

For a more detailed description of these land development and transportation infrastructure projects see Section 4.A, Introduction to Chapter 4, pp. 4.A.7-4.A.13 and Figure 4.A.1, p. 4.A.12.

Transit Network Baseline

Under baseline conditions, the following approved transit-related improvements will be constructed:

- California Laurel Village Improvement Project is under construction and expected to be complete in November 2018. This project would relocate the existing near-side bus stop at the southwest corner of California Street at Laurel Street to the far side and bus bulbs will be constructed on the northeast and southeast corners of the intersection. See Chapter 2, Figure 2.22: Proposed Site Access, p. 2.61, for the proposed transit stop

[22] These baseline projects were either under construction or approved and funded at the time the Notice of Preparation was issued (September 20, 2017).

[23] The Booker T. Washington development was constructed but not fully occupied when intersection counts (vehicle, bicycle, and pedestrian) were collected.

[24] SFTMA, Masonic Avenue Streetscape Project Fact Sheet, May 2016, https://www.sfmta.com/sites/default/files/projects/2016/Masonic%20Factsheet.pdf, accessed May 25, 2018.

[25] San Francisco Public Works, Masonic Avenue Streetscape Project, http://sfpublicworks.org/masonic, accessed May 25, 2018.

[26] San Francisco Public Works, California Laurel Village Improvement Project, http://sfpublicworks.org/project/california-laurel-village-improvement-project, accessed May 25, 2018.

[27] SFMTA, Laurel Heights/Jordan Park Traffic Calming Project, 2012, https://www.sfmta.com/sites/default/files/projects/Laurel%20Heights-Jordan%20Park%20Final%20Report.pdf, accessed May 25, 2018.

relocations and for the proposed bus bulb-out at the southeast corner of Laurel and California streets.

- Masonic Avenue Streetscape Project was under construction at the time transportation analysis commenced for this project and was completed in September 2018. With this project, bus stops will be constructed between Fell Street and Geary Boulevard. Enhancements may include additional seating, shelter, or other amenities.

These projects will generally improve transit conditions in the area. Construction of bus bulbs will provide additional space for passengers to wait and allow for more efficient boarding and alighting of passengers and re-entry into the travel lane.

The analysis of capacity utilization for local and regional transit services considers project contribution by screenline. Given the limited amount of new development in the surrounding area, ridership and capacity on local lines serving the site are expected to be the same under baseline conditions as under existing conditions. The baseline and baseline plus project conditions screenline analyses utilize local and regional screenlines and corridor information from the SF-CHAMP 2020 Model Run. Table 4.C.5 and Table 4.C.7, pp. 4.C.12 and 4.C.15, respectively, present the weekday a.m. and p.m. peak hour ridership and capacity utilization on the individual Muni lines and on Muni downtown screenlines for baseline conditions.

Pedestrian Network Baseline

Under baseline conditions, the following approved pedestrian-related changes will be constructed:

- California Laurel Village Improvement Project is under construction and expected to be complete in November 2018. This project would construct a bulb-out on the southwest corner of California Street/Laurel Street and a bulb-out and high-visibility crosswalk markings and concrete islands at Locust Street. The project will also add landscaping features along the California Street south sidewalk, west of Laurel Street.
- Masonic Avenue Streetscape Project was under construction at the time transportation analysis commenced for this project and was completed in September 2018. With this project, sidewalks on both sides of Masonic Avenue will be widened in some locations, sidewalk bulb-outs will be constructed, high-visibility crosswalks and new pedestrian-scale lighting will be installed, and a landscaped median will be constructed between Fell Street and Geary Boulevard.
- Laurel Heights/Jordan Park Traffic Calming Project (Phase 3) was completed in March 2018. With this project, speed cushions were installed on Euclid Avenue between Arguello/Palm, Palm/Jordan, and Iris/Manzanita. Two landscaped traffic circles were installed, one at Euclid Avenue/Parker Avenue and another at Euclid Avenue/Collins Street. Landscaped traffic islands were installed on Euclid Avenue at Spruce Street, Heather Street, Iris Street, Manzanita Street and Laurel Street. A channelizing island was constructed at Euclid Avenue/Laurel Street and a 2-foot buffer was added to the existing bicycle lane. In May/June 2018, after completion of a traffic operations evaluation of the new traffic circles along Euclid Avenue, the SFMTA installed ‘Yield to Pedestrian” signs on all four legs of each intersection where traffic circles were constructed.

These projects will generally improve pedestrian conditions in the area. Construction of high-visibility crosswalks and pedestrian-scale lighting will increase pedestrian visibility and create a safer place to walk. Additionally, installation of traffic calming treatments such as bulb-outs will slow vehicle traffic and reduce crossing distances for pedestrians.

Bicycle Network Baseline

The Masonic Avenue Streetscape Project was under construction at the time of the NOP and commencement of the transportation analyses and was completed in September 2018. Therefore, it is included in the baseline conditions. This project includes the construction of a class IV raised cycle track from Fell Street to Geary Boulevard. The Laurel Heights/Jordan Park Traffic Calming Project was completed in March 2018. The project included restriping Euclid Avenue between Arguello Boulevard and Masonic Avenue and installing a 2-foot buffer for the existing bike lane. These projects will not substantially change bicycle conditions in the area. While conditions along Euclid Avenue and Masonic Avenue will improve, relative to existing conditions, bicyclists may continue to avoid California Street and Presidio Avenue adjacent to the project site due to various conditions including, but not limited to, higher traffic volumes and vehicle speeds, presence of transit, lack of dedicated bicycle facilities, and topography. The potential for conflicts between bicycles and transit and freight/passenger loading vehicles accessing curbside bus stops or loading zones will remain.

Vehicle Miles Traveled Baseline

For purposes of the VMT analysis, the baseline conditions VMT for the region and the project's transportation analysis zone for each of the uses proposed by the project and project variant would be the same as existing. This conclusion is based on the fact that the development and changes to the transportation network that would occur under baseline conditions is not anticipated to have a substantive impact on per capita or per employee VMT in the study area. The conclusion is supported by the VMT analysis results for 2040 cumulative conditions, which is projected to be lower than VMT under existing conditions (see Table 4.C.23 on p. 4.C.102 below under Impact C-TR-2, Cumulative VMT Impacts). Therefore, the interim baseline conditions VMT could be lower than existing VMT. As such, this analysis can be considered conservative.

Freight and Passenger Loading Baseline

No major changes to existing on-street or off-street loading facilities are planned for the study area under baseline conditions. New developments near the project site will provide their own off-street loading facilities in compliance with planning code requirements. Drop-off and pick-up for the Jewish Community Center of San Francisco will continue to occur along California Street across from the project site. Observed and potential conflicts between passenger loading vehicles and buses on California Street will remain under baseline conditions.

Emergency Access Baseline

Under baseline conditions, the roadway network will generally remain the same with streetscape changes along Masonic Avenue and California Street and implementation of traffic calming devices along Euclid Avenue and within the Laurel Heights/Jordan Park area. While a small amount of background growth and growth attributable to the approved/under construction projects near the project site will result in some increased traffic levels and congestion, the roadway network will continue to accommodate emergency vehicle access to the project site.

REGULATORY FRAMEWORK

This section provides a summary of the plans and policies of the City and County of San Francisco, and regional, state, and federal agencies that have policy and regulatory control over the project site. These plans and policies include the San Francisco General Plan, the San Francisco Bicycle Plan, and the Transit-First Policy.

FEDERAL

There are no federal transportation regulations applicable to the proposed project or project variant.

STATE

Public Resources Code Section 21099

In 2013, the California State Legislature passed Senate Bill 743, which added section 21099 to CEQA. Section 21099(b)(1) requires that the State Office of Planning and Research (OPR) develop revisions to the CEQA Guidelines establishing criteria for determining the significance of transportation impacts of projects within transit priority areas. Specifically, Senate Bill 743 called on OPR to study the removal of automobile delay as a metric for evaluating transportation impacts and to develop alternative metrics that better match the state's policies around promoting infill development, promoting public health through active transportation, and reducing GHG emissions.

Additionally, Senate Bill 743 requires changes to the analysis of parking impacts for certain urban infill projects in transit priority areas.[28] Public Resources Code section 21099(d), effective January 1, 2014, provides that "… parking impacts of a residential, mixed-use residential, or

[28] A "transit priority area" is defined as an area within one half of a mile of an existing or planned major transit stop. A "major transit stop" is defined in Public Resources Code section 21064.3 as a rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods. A map of San Francisco's Transit Priority Areas is available online at http://sfmea.sfplanning.org/Map%20of%20San%20Francisco%20Transit%20Priority%20Areas.pdf.

employment center project on an infill site located within a transit priority area shall not be considered significant impacts on the environment." Accordingly, parking is no longer to be considered in determining whether a project has the potential to result in significant environmental effects for projects that meet all three criteria established in the statute.

REGIONAL

There are no regional transportation regulations applicable to the proposed project or project variant.

LOCAL

Transit-First Policy

In 1998, voters in San Francisco voters amended the City Charter (Charter Article 8A, section 8A.115) to include a Transit-First Policy, which was first articulated as a City priority policy by the Board of Supervisors in 1973. The Transit-First Policy is a set of principles that underscore the City's commitment that travel by transit, bicycle, and foot be given priority over the private automobile. These principles are embodied in the policies and objectives of the Transportation Element of the general plan. All City boards, commissions, and departments are required, by law, to implement transit-first principles in conducting City affairs.

San Francisco General Plan

The Transportation Element of the general plan is composed of objectives and policies that relate to the eight aspects of the citywide transportation system: General Regional Transportation, Congestion Management, Vehicle Circulation, Transit, Pedestrian, Bicycles, Citywide Parking, and Goods Management. The Transportation Element references San Francisco's Transit-First Policy in its introduction, and contains the following objectives and policies that are directly pertinent to consideration of the proposed project:

- Objective 2: Use the transportation system as a means for guiding development and improving the environment.
  - Policy 2.1: Use rapid transit and other transportation improvements in the city and region as the catalyst for desirable development, and coordinate new facilities with public and private development.
  - Policy 2.4: Organize the transportation system to reinforce community identity, improve linkages among interrelated activities, and provide focus for community activities.
  - Policy 2.5: Provide incentives for the use of transit, carpools, vanpools, walking, and bicycling and reduce the need for new or expanded automobile and automobile parking facilities.

- Objective 11: Establish public transit as the primary mode of transportation in San Francisco and as a means through which to guide future development and improve regional mobility and air quality.
  - Policy 11.3: Encourage development that efficiently coordinates land use with transit service, requiring that developers address transit concerns as well as mitigate traffic problems.
- Objective 14: Develop and implement a plan for operational changes and land use policies that will maintain mobility and safety, despite a rise in travel demand that could otherwise result in system capacity deficiencies.
  - Policy 14.2: Ensure that traffic signals are timed and phased to emphasize transit, pedestrian, and bicycle traffic as part of a balanced multimodal transportation system.
  - Policy 14.3: Improve transit operation by implementing strategies that facilitate and prioritize transit vehicle movement and loading.
  - Policy 14.4: Reduce congestion by encouraging alternatives to the single-occupancy auto through the reservation of right-of-way and enhancement of other facilities dedicated to multiple modes of transportation.
  - Policy 14.7: Encourage the use of transit and other alternative modes of travel to the private automobile through the positioning of building entrances and the convenient location of support facilities that prioritizes access from these modes.
- Objective 16: Develop and implement programs that will efficiently manage the supply of parking at employment centers throughout the city so as to discourage single-occupant ridership and encourage ridesharing, transit, and other alternatives to the single-occupant automobile.
  - Policy 16.5: Reduce parking demand through limiting the absolute amount of spaces and prioritizing the spaces for short-term and ride-share uses.
  - Policy 16.6: Encourage alternatives to the private automobile by locating public transit access and ride-share vehicle and bicycle parking at more close-in and convenient locations onsite, and by locating parking facilities for single-occupant vehicles more remotely.
- Objective 18: Establish a street hierarchy system in which the function and design of each street are consistent with the character and use of the adjacent land.
  - Policy 18.2: Design streets for a level of traffic that serves, but will not cause a detrimental impact on, adjacent land uses or eliminate the efficient and safe movement of transit vehicles and bicycles.
  - Policy 18.5: Mitigate and reduce impacts of automobile traffic in and around parks and along shoreline recreation area.
- Objective 23: Improve the city's pedestrian circulation system to provide for efficient, pleasant, and safe movement.
  - Policy 23.2: Widen sidewalks where intensive commercial, recreational, or institutional activity is present and where residential densities are high.

  - Policy 23.3: Maintain a strong presumption against reducing sidewalk widths, eliminating crosswalks, and forcing indirect crossings to accommodate automobile traffic.
  - Policy 23.6: Ensure convenient and safe pedestrian crossings by minimizing the distance pedestrians must walk to cross a street.
- Objective 24: Improve the ambiance of the pedestrian environment.
- Objective 28: Provide secure and convenient parking facilities for bicycles.
  - Policy 28.1: Provide secure bicycle parking in new governmental, commercial, and residential developments.
  - Policy 28.3: Provide parking facilities which are safe, secure, and convenient.
- Objective 30: Ensure that the provision of new or enlarged parking facilities does not adversely affect the livability and desirability of the city and its various neighborhoods.
  - Policy 30.1: Assure that new or enlarged parking facilities meet need, locational and design criteria.
  - Policy 30.5: In any large development, allocate a portion of the provided off-street parking spaces for compact automobiles, vanpools, bicycles and motorcycles commensurate with standards that are, at a minimum, representative of their proportion of the city's vehicle population.
  - Policy 30.8: Consider lowering the number of automobile parking spaces required in buildings where Class 1 bicycle parking is provided.
- Objective 34: Relate the amount of parking in residential areas and neighborhood commercial districts to the capacity of the city’s street system and land use patterns.
  - Policy 34.1: Regulate off-street parking in new housing so as to guarantee needed spaces without requiring excesses and to encourage low auto ownership in neighborhoods that are well served by transit and are convenient to neighborhood shopping.
  - Policy 34.3: Permit minimal or reduced off-street parking for new buildings in residential and commercial areas adjacent to transit centers and along transit preferential streets.
- Objective 35: Meet short-term parking needs in neighborhood shopping districts consistent with preservation of a desirable environment for pedestrians and residents.
  - Policy 35.1: Provide convenient on-street parking specifically designed to meet the needs of shoppers dependent upon automobiles.
  - Policy 35.2: Assure that new neighborhood shopping district parking facilities and other auto-oriented uses meet established guidelines.

San Francisco Better Streets Plan

The San Francisco Better Streets Plan focuses on creating a positive pedestrian environment through measures such as careful streetscape design and traffic calming measures to increase pedestrian safety. The plan includes guidelines for the pedestrian environment, defined as the areas of the street where people walk, sit, shop, play, or interact. In general, the guidelines are for design of sidewalks and crosswalks; however, in some cases, the better streets plan includes guidelines for other areas of the roadway, particularly at intersections. The minimum and recommended sidewalk widths in the plan for streets adjacent to the project site are summarized below:

- Residential Throughway. Minimum 12 feet wide, recommended 15 feet wide
  - California Street, from Laurel Street to Walnut Street
  - Masonic Avenue, from Presidio Avenue to Euclid Avenue
- Commercial Throughway. Minimum 12 feet wide, recommended 15 feet wide
  - California Street, from Walnut Street to Presidio Avenue
- Neighborhood Commercial. Minimum 12 feet wide, recommended 15 feet wide
  - Presidio Avenue, from California Street to Pine Street
- Neighborhood Residential. Minimum 10 feet wide, recommended 12 feet wide
  - Laurel Street, from California Street to Euclid Avenue
  - Euclid Avenue, from Laurel Street to Masonic Avenue/Bush Street

Vision Zero

Vision Zero is a policy adopted by both the San Francisco Board of Supervisors and the SFMTA to eliminate all traffic deaths in San Francisco by the year 2024. The goal of Vision Zero is also to reduce severe injury inequities across neighborhoods, transportation modes, and populations. Some actions SFMTA has and will take to improve pedestrian safety include safer signal timing at intersections, adding “continental” crosswalks (crosswalks with zebra striping), “leading” pedestrian signals that allow pedestrians to get a head start at signalized intersections, red zones at intersections to improve visibility, and pedestrian bulbs to shorten pedestrian crossing distances. The project site is not located adjacent to the high injury network. Within the study area, Geary Boulevard between 31st Avenue and Steiner Street, California Street between Lyon and Scott streets, and Post Street between Lyon and Steiner streets are on the high injury network.[29]

Transportation Sustainability Program

The Transportation Sustainability Program is an effort to reconcile the increasing demand for transportation within San Francisco with the very limited right-of-way available. The program aims to achieve a more efficient transportation system through a three-pronged approach. The program calls for improved investment in transportation infrastructure, alignment of the City’s environmental review processes with City policies, and adopting new practices supporting a shift in travel from single-occupant vehicles to other, more space-efficient modes of travel.

[29] San Francisco Department of Public Health, Vision Zero High Injury Network: 2017, http://sfgov.maps.arcgis.com/apps/webappviewer/index.html?id=fa37f1274b4446f1bdddd7bdf9e708ff, accessed May 25, 2018.

The Transportation Sustainability Program comprises three components: enhance transportation to support growth (invest), modernize environmental review (align), and encourage sustainable travel (shift). The first component was adopted in November 2015 by the Board of Supervisors when a transportation sustainability fee ordinance was enacted. The transportation sustainability fee provides for investment in the transportation network by having developers pay a portion of their fair share to help offset the effects of growth. The second component involved adoption of a resolution by the Planning Commission in March 2016. The resolution changed how the City analyzes the impacts of new developments on the transportation system so that it better aligns with the City's long-standing environmental policies (e.g., reducing GHG emissions, implementing active transportation improvements, and encouraging infill development). The Planning Commission resolution removed automobile delay as a significant impact on the environment and replaced it with a VMT threshold for all CEQA environmental determinations going forward. The third component involved implementing a TDM Ordinance, approved by the Board of Supervisors in February 2017, which requires new developments to incorporate "design features, incentives, and tools" to reduce VMT. New development projects are required to choose from a menu of options to develop an overall plan for TDM, subject to certain modifications that may be made for large projects (such as the proposed project) subject to a development agreement. Each development project's TDM plan will require monitoring and reporting to the planning department to demonstrate compliance.

Climate Action Plan

In response to overwhelming scientific evidence suggesting that human behavior is accelerating climate change, the City adopted a Climate Action Plan to address actions the City could take to reduce its contribution to climate change. The Climate Action Plan describes the effects that climate change may have on San Francisco based on scientific research and presents an inventory of San Francisco's contribution to greenhouse gas emissions – the leading human contributor toward accelerating climate change. The plan also recommends a greenhouse gas reduction target and describes specific measures that the City could take to reach its target – including recommendations for reducing trips by automobile.

IMPACTS AND MITIGATION MEASURES

This section describes the impact analysis related to transportation and circulation for the proposed project and project variant. This section also describes the methods used to determine the impacts of the proposed project and project variant and lists the thresholds used to conclude whether an impact would be significant. Measures to mitigate (i.e., avoid, minimize, rectify, reduce, eliminate, or compensate for) significant impacts accompany the discussion of each identified significant impact.

SIGNIFICANCE THRESHOLDS

The significance criteria listed below are organized by mode to facilitate the transportation impact analysis; however, the transportation significance thresholds are essentially the same as the ones in the environmental checklist (Appendix G of the State CEQA Guidelines) and incorporate San Francisco Planning Commission Resolution 19579 and supporting materials.[30,31] For the purpose of this analysis, the following applicable thresholds were used to determine whether implementing the proposed project or project variant would result in a significant impact on transportation and circulation:

- **Vehicle Miles Traveled**
  - The project would have a significant effect on the environment if it would cause substantial additional VMT.
  - The project would have a significant effect on the environment if it would substantially induce additional automobile travel by increasing physical roadway capacity in congested areas (i.e., by adding new mixed-flow travel lanes) or by adding new roadways to the network.
- **Traffic** – The project would have a significant adverse impact if it would cause major traffic hazards.
- **Transit** – A project would have a significant effect on the environment if it would cause a substantial increase in transit demand that could not be accommodated by adjacent transit capacity, resulting in unacceptable levels of transit service; or cause a substantial increase in delays or operating costs such that significant adverse impacts in transit service levels could result. With the Muni and regional transit screenlines analyses, the project would have a significant effect on the transit provider if project-related transit trips would cause the capacity utilization standard to be exceeded during the peak hour. For screenlines that already operate above the utilization standard during the peak hour, a project would have a significant effect on the transit provider if project-related transit trips were more than 5 percent of total transit trips during the peak hour.
- **Pedestrians** – A project would have a significant effect on the environment if it would result in substantial overcrowding on public sidewalks, create potentially hazardous conditions for pedestrians, or otherwise interfere with pedestrian accessibility to the site and adjoining areas.
- **Bicycles** – A project would have a significant effect on the environment if it would create potentially hazardous conditions for bicyclists or otherwise substantially interfere with bicycle accessibility to the site and adjoining areas.
- **Loading** – A project would have a significant effect on the environment if it would result in a loading demand during the peak hour of loading activities that could not be accommodated within proposed on-site loading facilities or within convenient on-street loading zones, and if it would create potentially hazardous conditions affecting traffic, transit, bicycles, or pedestrians or significant delays affecting transit.

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[30] San Francisco Planning Department, *Updated TIA Significance Thresholds*, September 13, 2016.
[31] San Francisco Planning Department, *TIA Significance Criteria Clarity Memo*, April 13, 2017.

- **Emergency Vehicle Access** – A project would have a significant effect on the environment if it would result in inadequate emergency access.
- **Construction** – Construction of the project would have a significant effect on the environment if, in consideration of the project site location and other relevant project characteristics, the temporary construction activities' duration and magnitude would result in substantial interference with pedestrian, bicycle, or vehicle circulation and accessibility to adjoining areas thereby resulting in potential hazardous conditions.
- **Parking** – The project would have a significant effect on the environment if it would result in a substantial parking deficit that could create hazardous conditions affecting traffic, transit, bicycles, or pedestrians or significant delays affecting transit and where particular characteristics of the project or its site demonstrably render use of other modes infeasible.

The project site is not located within an area covered by an airport land use plan or within 2 miles of a public airport or public use airport; nor is it within the vicinity of a private airstrip. Therefore, implementation of the proposed project or project variant would not result in a change in air traffic patterns, including either an increase in traffic levels, obstructions to flight, or a change in location, that results in substantial safety risks, and these issues are not addressed in this EIR.

PROJECT FEATURES

Proposed Project Development Program

The proposed project would include a total of 558 residential units (235 studios and one-bedroom units and 323 two or more bedroom units), 54,117 gross square feet of retail space (40,004 gross square feet of general retail space, 4,287 gross square feet of quality sit-down restaurant space, and 9,826 gross square feet of composite restaurant space), and 14,690 gross square feet of daycare space.

The proposed project would provide 896 vehicle parking spaces (100 office, 558 residential, 138 retail, 29 daycare, 60 public, and 11 car share) in four below-grade garages and six individual two-car parking garages.[32]

Walnut Building Variant Development Program

The project variant would change the use of the proposed Walnut Building from a mixed-use office building to a mixed-use residential building. Under the project variant, the 49,999 gross square feet of office would be replaced with 153,920 gross square feet of residential space for 186 residential units. Under the project variant, the proposed Walnut Building would be taller

[32] The parking garages may be interconnected; however, the engineering feasibility of internal connections has yet to be determined.

than under the proposed project to accommodate the additional residential floors.[33] The project variant would provide 744 dwelling units (186 more than the proposed project) consisting of 313 one-bedroom units and 431 two or more bedroom units. The project variant would provide 48,593 gross square feet of retail space (34,480 gross square feet of general retail space, 4,287 gross square feet of quality sit-down restaurant space, and 9,826 gross square feet of composite restaurant space), and 14,650 gross square feet of daycare space. Retail and daycare gross square footage space would be slightly reduced compared to the proposed project.

The project variant would include 970 vehicle parking spaces (744 residential, 128 retail, 29 daycare, 60 public, and 9 car share) in four below-grade garages and six individual two-car parking garages. The project variant would provide the freight and passenger loading spaces in the same number and location as the proposed project.

Project Transportation Changes Assumed in the Analysis

Roadway Network

STREETSCAPE CHANGES

The proposed project or project variant proposes streetscape modifications to Presidio Avenue, Masonic Avenue and Euclid Avenue, and Laurel Street and Mayfair Drive, as described below and illustrated in Figure 2.28a: Existing and Proposed Streetscape Changes – Presidio Avenue and Figure 2.28b: Existing and Proposed Streetscape Changes – Masonic Avenue in Chapter 2, Project Description, pp. 2.80-2.82.

- Presidio Avenue. The proposed project and project variant would include an encroachment at the eastern property boundary along Presidio Avenue, immediately north of the intersection with Pine Street and Masonic Avenue, to accommodate streetscape changes. The proposed project or project variant would reconfigure the curb line in this area to regularize the property's frontage on Presidio Avenue. These proposed modifications to the eastern edge of the property would be combined with the removal of the triangular-shaped pedestrian island and the right-most travel lane for southbound traffic on Presidio Avenue merging onto Masonic Avenue, the construction of a corner bulb-out on the west side of the Masonic Avenue/Presidio Avenue/Pine Street intersection, the installation of a continental crosswalk crossing Presidio Avenue (to Pine Street), and the widening of the Presidio Avenue sidewalk (from 10 to 15 feet).
- Masonic Avenue and Euclid Avenue. The proposed project or project variant would reconfigure the west curb line on Masonic Avenue and remove the triangular-shaped pedestrian island and right-most travel lane for southbound traffic on Masonic Avenue merging onto Euclid Avenue to regularize the intersection of Masonic and Euclid avenues. The existing triangular-shaped pedestrian island would be incorporated into an

[33] The proposed Walnut Building under the project variant would be 67 feet tall while under the proposed project it would be 45 feet tall.

approximately 4,000-square-foot open space (the proposed Corner Plaza) that would be integrated with the southern end of the proposed Walnut Walk.

- Laurel Street and Mayfair Drive. The proposed project or project variant would add a corner bulb-out at the northeast corner of Laurel Street/Mayfair Drive and an east-side crosswalk at the three-way intersection (crossing Mayfair Drive).
- Laurel Street and Euclid Avenue. The proposed project or project variant would add a corner bulb-out at the northwest corner of Laurel Street/Euclid Avenue.

CURB CUT MODIFICATIONS

Circulation changes implemented by the proposed project or project variant (see Figure 2.22, p. 2.61) would include the introduction, elimination, or relocation of existing curb cuts on Presidio, Masonic, and Euclid avenues; on Laurel Street; and on Mayfair Drive, as follows:

- The existing 28-foot-wide curb cut at the California Street entrance would be reduced to 22 feet with the development of curb bulb-outs at the extension of Walnut Street into the project site, which would terminate with a roundabout. The Walnut Street extension would provide access to two of the California Street parking garage entrances.
- The existing 28-foot-wide curb cut on Presidio Avenue would remain, but would be adjusted slightly to follow the proposed modification to the alignment of the west curb on Presidio Avenue, to be parallel to the existing east curb. The driveway would provide in and out access for the off-street freight loading area and separate in-only access to the California Street Garage for office, retail, daycare, and residential parking uses as well as commercial parking.
- A new 20-foot-wide curb cut would be provided for vehicles exiting to Masonic Avenue from the California Street Garage and Basement Level B3 of Center Building B.
- A new 24-foot-wide curb cut on Masonic Avenue would provide in and out access to the proposed Masonic and California Street garages.
- The existing 27-foot-wide curb cut on Laurel Street (between Mayfair Drive and Euclid Avenue) would be removed.
- Six of the seven Laurel Duplexes would have independent access to their respective garages (12 independent parking spaces in total) via six separate 10-foot-wide curb cuts along Laurel Street, south of Mayfair Drive.
- The existing 22-foot-wide curb cut on Mayfair Drive would be relocated to the south and modified to be a 12-foot-wide driveway to provide in and out access to the proposed Mayfair Building's below-grade parking garage.
- A new 18-foot-wide curb cut on Laurel Street would provide in and out access to the proposed California Street Garage.

The proposed streetscape and curb cut modifications on and adjacent to the roadway network would result in a net reduction of about 36 on-street parking spaces (including two car-share spaces on Euclid Avenue) and a net increase of about 180 feet of on-street passenger loading space (which can accommodate about 9 passenger vehicles) and 100 feet of on-street commercial loading space (which can accommodate up to three, 30-foot-long, single-unit trucks). As described below on pp. 4.C.42-4.C.43 and illustrated on Figure 2.22, p. 2.61, three 60-foot-long passenger loading zones would be located on the perimeter streets - one each on Masonic Avenue, Euclid Avenue, and Laurel Street - and a commercial loading zone would be located on California Street.

Bicycle Network Changes

The proposed project would provide 592 class 1 bicycle parking spaces: 558 spaces for residential uses, 10 spaces for office uses, 14 spaces for retail uses, and 10 spaces for the daycare use. Each proposed multi-family residential and mixed-use building would include a class 1 bicycle parking storage room at street level or at Basement Levels B1 or B2 to accommodate the required class 1 bicycle parking spaces.

The proposed project would also provide 101 class 2 bicycle parking spaces: 56 spaces for residential uses, 33 spaces for retail uses, 10 spaces for the daycare use, and 2 spaces for office uses.[34] The proposed class 2 bicycle parking spaces would be arranged along the edges of the project site at pedestrian access points and near building entrances, and adjacent to the Walnut Building near the roundabout terminating at the extension of Walnut Street into the project site, as follows:

- 48 spaces on the south side of California Street near Laurel Street (16), near Walnut Street (16), and near the eastern edge of the property (16)
- 14 spaces on the west side of Presidio Avenue at the Masonic Avenue/Pine Street intersection (near the proposed Pine Street Steps and Plaza)
- 14 spaces on the west side of Masonic Avenue at the Masonic Avenue/Euclid Avenue intersection (near the proposed Corner Plaza)
- 10 spaces on the north side of Euclid Avenue at the Euclid Avenue/Laurel Street intersection (near the proposed Euclid Green)
- 15 spaces at the center of the site adjacent to the Walnut Building near the roundabout at the end of the Walnut Street extension

The project variant would provide 768 class 1 bicycle parking spaces: 744 spaces for residential uses, 14 spaces for retail uses, and 10 spaces for the daycare use. The project variant would also provide 122 class 2 bicycle parking spaces: 75 spaces for residential uses, 37 spaces for retail uses, and 10 spaces for the daycare use. The proposed class 1 and 2 bicycle parking spaces would be provided in the same general locations as those for the proposed project. The proposed bicycle parking would not result in the removal of on-street parking spaces.

[34] Each bicycle rack would accommodate two bicycles.

Pedestrian Network Changes

The proposed project or project variant would widen the existing 10-foot-wide sidewalks on Presidio and Masonic avenues (adjacent to the project site) to meet the recommended widths identified in the better streets plan (15 feet). The existing sidewalks on Euclid Avenue (10.5 feet wide) and Laurel Street (10 feet wide) would be widened to meet the minimum widths identified in the better streets plan (12 feet). The proposed sidewalk widening on Masonic and Euclid avenues would contribute to the parking loss of 36 adjacent on-street parking spaces when combined with the development of the proposed Pine Street and Corner plazas at the intersections of Presidio Avenue/Masonic Avenue/Pine Street and Masonic Avenue/Euclid Avenue, respectively, and the proposed corner bulbout at the northeast corner of Euclid Avenue and Laurel Street.

The project site would be integrated with the existing street grid. Pedestrian promenades would be developed to align with Walnut Street and connect to Masonic and Euclid avenues (north/south direction), and to align with Mayfair Drive and connect to Presidio and Masonic avenues and Pine Street (east/west direction). The north-south running Walnut Walk and the east-west running Mayfair Walk would be closed to vehicular traffic. The northern portion of Walnut Walk would be the extension of Walnut Street into the project site, which would provide vehicular access to the California Street Garage and terminate at a roundabout. Pedestrians would be able to walk through the project site from Laurel, California, and Walnut streets to Presidio Avenue, Masonic Avenue, Pine Street, and Euclid Avenue. In addition, a pedestrian walkway between the Plaza A and Plaza B buildings (Cypress Stairs) would provide access from the California Street sidewalk (at the mid-block between Laurel and Walnut streets) to Cypress Square, one of the proposed on-site publicly accessible plazas. Pedestrian access would also be provided at Walnut Street, at Presidio Avenue between California and Pine Streets at the eastern terminus of Mayfair Walk (the proposed Pine Street Steps and Plaza), at the intersection of Masonic and Euclid Avenues at the southern terminus of Walnut Walk (the proposed Corner Plaza), and at the western terminus of Mayfair Walk. In addition, access to the proposed Euclid Green would be developed at the corner of Laurel Street and Euclid Avenue. These spaces would be designed to be compliant with the Americans with Disabilities Act.

Loading Supply

FREIGHT AND PASSENGER LOADING

The proposed project or project variant would provide six off-street commercial and residential freight loading spaces, with three located in the off-street freight loading area in the proposed California Street Garage, accessed from Presidio Avenue, and three located in the off-street freight loading area in the proposed Masonic Garage under the Masonic and Euclid buildings. The proposed off-street loading area in the California Street Garage would accommodate 40-foot-long Recology garbage trucks, 30-foot-long single unit trucks, and 55-foot-long intermediate semitrailer trucks. The proposed off-street loading area in the Masonic Garage would accommodate 40-foot-long Recology garbage trucks and 30-foot-long single unit trucks. Vertical clearance for the proposed California Street and Masonic garage entrances from Presidio Avenue and Masonic Avenue would be 15 feet.

Residential move-in and move-out loading activities for the new and renovated buildings (except the Laurel Duplexes) would occur within these off-street freight loading areas in the proposed California Street and Masonic garages or from existing on-street spaces along California Street, Presidio Avenue, Masonic Avenue, Euclid Avenue, or Laurel Street (with a special time-limited permit from the SFMTA for use of existing on-street parking spaces). Residential move-in and move-out loading activities for the Laurel Duplexes would occur along Laurel Street (with a special time-limited permit from the SFMTA for use of on-street parking spaces) and/or from private parking garages, as described below. Commercial freight loading activities would occur at the off-street freight loading dock accessed from Presidio Avenue and would serve all future retail and office tenants via service corridors, elevators, and internal stairs.

In addition to the six proposed off-street freight loading spaces, the project sponsor would request from the SFMTA the conversion of 15 on-street parking spaces to four separate loading zones, one commercial and three passenger zones, at the following locations:

- South side of California Street near Laurel Street (100-foot-long commercial)
- West side of Masonic Avenue near Presidio Avenue and Pine Street (60-foot-long passenger)
- North side of Euclid Avenue near Masonic Avenue (60-foot-long passenger)
- East side of Laurel Street near Mayfair Drive (60-foot-long passenger)

The proposed on-street loading zones would contribute to the loss of adjacent on-street parking spaces. Passenger loading would also occur at the proposed roundabout, which would terminate the Walnut Street extension into the project site. In addition, daycare center pick-up/drop-off activities would occur at Basement Level B3 of the California Street Garage at a location adjacent to the elevator lobby for the proposed daycare center space.

TRASH COLLECTION

Centralized trash rooms with combined chutes or bins for recyclable, compostable and trash would be located within each residential building on every floor. The combined chutes would terminate into separate recyclable, compostable, and trash bins using tri-waste sorters and would be held within trash collection rooms. If separated into bins at each floor by occupants or tenants, the bins would be collected and transported via elevator to the trash collection rooms in the basement levels of each building. The solid waste bins would be transported via an electric tow tractor system to the off-street refuse staging areas adjacent to the off-street freight loading docks in the California Street and Masonic garages and compacted for off-site transport. Self-contained compactors for landfill materials, mixed recyclables, and compost would be located in both refuse staging areas with container capacity ranging from 15 to 25 cubic yards. Commercial solid waste management activities for the retail and office uses would be accommodated in the basement-level trash collection rooms with internal connections via service corridors, elevators, and internal stairs to the off-street refuse staging area in the California Street Garage.

Transportation Demand Management Plan

San Francisco Planning Code section 169 identifies the applicability of the transportation demand management (TDM) Program and establishes the TDM Program Standards for new development. Based on these requirements, the proposed project and project variant are subject to the TDM Program and must submit a TDM Plan. The proposed TDM Plan is described in this section and the TDM Application is included in EIR Appendix D.

Based on the timing of the development application, the proposed project or project variant is subject to 50 percent of the applicable overall target requirement for each land use category.[35] As such, the proposed project would need 16 points for the retail use, 12 points for the office/daycare use, and 16 points for the residential use. The project variant would need 16 points for the retail use, 7 points for the daycare use, and 16 points for the residential use. The proposed TDM measures are summarized in Table 4.C.9: Transportation Demand Management Plan.

As shown in Table 4.C.9, the proposed project and project variant would meet or exceed established targets. Details of the TDM measures proposed as part of the proposed project or project variant are included in EIR Appendix D.

Consistent with requirements outlined in planning code section 169, the project sponsor commits to monitoring, reporting, and compliance throughout the life of the project to ensure the TDM Plan is being implemented correctly, on an on-going basis.

[35] Planning Code section 169.3(e) states that "Development Projects with a Development Application filed or an Environmental Application deemed complete on or before September 4, 2016 shall be subject to 50 percent of the applicable target, as defined in the Planning Commission's Standards. Development Projects with no Development Application filed or an Environmental Application deemed complete on or before September 4, 2016, but that file a Development Application on or after September 5, 2016, and before January 1, 2018, shall be subject to 75 percent of such target. Development Projects with a Development Application on or after January 1, 2018 shall be subject to 100 percent of such target." The project sponsor submitted a complete Environmental Evaluation Application on April 4, 2016; the proposed project is therefore subject to the 50 percent target.

Table 4.C.9: Transportation Demand Management Plan

TDM Measure	Description	Points Per Land Use Category		
		A: Retail	B: Office	C: Residential
Active-1A	Improve biking/walking conditions	1	1	1
Active-2A	Bicycle parking	1	1	-
Active-2B	Bicycle parking	-	-	2
Active-3	Showers and lockers	1	1	-
Active-5A	Bicycle repair station	1	1	1
Cshare-1A	Car share parking	1	1	1
Delivery-1	Delivery supportive amenities	1	-	1
Family-2	On-site childcare	2	2	2
Info-1	Multimodal wayfinding signage	1	1	1
Info-2	Real-time information displays	1	1	1
Info-3B	Tailored transportation marketing	2	-	2
Pkg-1D	Unbundled parking	4	4	4
	TDM Point Target (50 percent)	***16***	***12***	***16***
	Total Points Achieved	***16***	***13***	***16***

Notes: "-" indicates TDM measure not selected or not applicable to this land use category.
Source: Kittelson & Associates, Inc. 2017

Construction Schedule and Phasing

The proposed project and project variant would be constructed in four overlapping development phases with full build-out expected to occur approximately 7 to 15 years after project entitlements. The four development phases are Phase 1 (Masonic and Euclid buildings), Phase 2 (Center Buildings A and B), Phase 3 (Plaza A, Plaza B, and Walnut buildings), and Phase 4 (Mayfair Building and Laurel Duplexes). The preliminary construction schedule assumes spring 2020 as the construction start and construction may last from 7 to as many as 15 years. See Chapter 2, Project Description, Table 2.5: Preliminary Construction Phasing Program, p. 2.92, for a break-out of the seven-year construction program). Construction would not commence until all existing uses at the UCSF Laurel Heights Campus, including the existing daycare center, have vacated the site.

As noted, the proposed project or project variant may be developed over a 15-year timeframe. The preliminary order of the construction phases for the proposed project or phase variant may also change, but not the nature of the construction activities within each phase. The same development program would be implemented with the same number of anticipated haul trips and construction workers for each phase regardless of the duration or order of construction; however, periods of dormancy may be introduced between construction phases and some construction activities currently assumed as concurrent may occur separately with a lengthened construction duration. For purposes of CEQA, the construction and operational transportation impact analysis under a seven-year timeframe is the most conservative (or worst case) analysis because it assesses construction over a shorter time period where traffic would be more concentrated and construction phases would overlap. Additionally, advances in technology and transportation infrastructure may further reduce the potential for adverse impacts related to a longer construction timeframe. Thus, the analysis errs on the side of overstating impacts.

The preliminary construction schedule and phasing is described in more detail in Chapter 2, Project Description, pp. 2.92-2.97.

APPROACH TO ANALYSIS

This section presents the analysis methodologies, the approach to developing the travel demand forecasts for the proposed project and project variant, and cumulative 2040 conditions, including reasonably foreseeable development projects and transportation changes.

Analysis Methodology

This section presents the methodology for analyzing transportation impacts and information considered in developing travel demand for the proposed project or project variant.

The analysis of the proposed project or project variant impacts was conducted by comparing the baseline conditions described in the "Baseline Conditions" discussion (pp. 4.C.27-4.C.31), to conditions under full buildout of the proposed project or project variant. For the cumulative analysis, future year 2040 cumulative conditions are compared to project buildout conditions for the proposed project and project variant. The year 2040 was selected because it is the latest year that travel demand forecasts are available from the transportation authority's travel demand forecasting model, SF-CHAMP.

Public Resources Code Section 21099

As discussed in Section 4.A, Introduction to Chapter 4, pp. 4.A.4-4.A.5, and above in the "Regulatory Framework" subsection, p. 4.C.31, Senate Bill 743 amended CEQA by adding Public Resources Code section 21099 regarding the analysis of parking impacts for certain urban infill projects in transit priority areas.[36] Accordingly, parking is no longer to be considered in determining if a project has the potential to result in significant environmental effects for projects that meet all three criteria established in the statute. The proposed project and project variant meet all of the criteria, and thus the transportation impact analysis does not consider the adequacy of

[36] A "transit priority area" is defined as an area within one half of a mile of an existing or planned major transit stop. A "major transit stop" is defined in Public Resources Code section 21064.3 as a rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods. A map of San Francisco's Transit Priority Areas is available online at http://sfmea.sfplanning.org/Map%20of%20San%20Francisco%20Transit%20Priority%20Areas.pdf.

parking in determining the significance of project impacts under CEQA (e.g., whether existing parking would be replaced by the project). However, the planning department acknowledges that parking conditions may be of interest to the public and the decision-makers. Therefore, this EIR presents a parking demand analysis for informational purposes and considers any secondary physical impacts associated with constrained supply if the project results in a substantial parking deficit (e.g., queuing by drivers waiting for on-site parking spaces that affects the public right-of-way) as applicable in the following transportation impact analysis.

Additionally, CEQA section 21099(b)(1) requires that OPR develop revisions to the CEQA Guidelines establishing criteria for determining the significance of transportation impacts of projects within transit priority areas that promote the "reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses." CEQA section 21099(b)(2) states that upon certification of the revised CEQA Guidelines for determining transportation impacts pursuant to section 21099(b)(1), automobile delay, as described solely by level of service (LOS) or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment under CEQA. CEQA section 21099(c) provides that OPR also may adopt guidelines with alternative metrics to use for traffic levels of service for transportation impacts that apply outside transit priority areas.

In January 2016, OPR published for public review and comment a Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA[37] (proposed transportation impact guidelines) recommending that transportation impacts for projects be measured using vehicle miles traveled (VMT) as the primary metric. VMT is defined as a measurement of miles traveled by vehicles within a specified region for a specified time period.

On March 3, 2016, the San Francisco Planning Commission, by Resolution No. 19579, adopted VMT as the principal criterion for determining transportation impacts. The Planning Commission's resolution:

- Found that OPR's proposed transportation impact guidelines, as described in the OPR Technical Advisory,[38] provide substantial evidence that VMT is an appropriate standard to use in analyzing transportation impacts to protect environmental quality and a better indicator of greenhouse gas, air quality, and energy impacts than automobile delay;
- Found that automobile delay, as described solely by LOS or similar measures of vehicular capacity or traffic congestion, will no longer be considered a significant impact on the environment pursuant to CEQA, because it does not measure environmental impacts and therefore it does not protect environmental quality;

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[37] State of California, Governor's Office of Planning and Research, *Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA: Implementing Senate Bill 743*, January 20, 2016, http://www.opr.ca.gov/docs/Revised_VMT_CEQA_Guidelines_Proposal_January_20_2016.pdf, accessed May 25, 2018.
[38] Ibid.

- Directed the Environmental Review Officer to remove automobile delay as a factor in determining significant impacts pursuant to CEQA for all guidelines, criteria, and list of exemptions, and to update the Transportation Impact Analysis Guidelines for Environmental Review and Categorical Exemptions from CEQA to reflect this change; and
- Directed the Environmental Planning Division and Environmental Review Officer to replace automobile delay with VMT criteria which promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses that are consistent with proposed and forthcoming changes to the CEQA Guidelines by OPR.

Planning Commission Resolution No. 19579 became effective immediately for all projects that have not received a CEQA determination and all projects that have previously received CEQA determinations but require additional environmental analysis.

Accordingly, this EIR contains a focused discussion of whether the addition of project vehicle trips may impact bicycle or pedestrian safety, transit operations, and emergency and private vehicle access, but does not include a discussion of potential impacts to drivers associated with automobile delay (e.g., the delays to drivers along California or Walnut streets).

Vehicle Miles Traveled Analysis

As noted above, the Planning Commission's Resolution No. 19579 is consistent with the direction of CEQA section 21099(b)(2) and the updated CEQA Guidelines. Moreover, it is based on and consistent with the authority and deference CEQA provides to local agencies to identify the methodology to analyze an environmental impact.[39] Residential and office projects located in areas with low VMT that incorporate similar features (i.e., sufficient density, mix of uses, transit accessibility) will tend to exhibit similarly low VMT. OPR's Technical Advisory recognizes that there are various methods for assessing VMT and specifically acknowledges the efficacy of a map-based screening approach as is used by the City.

San Francisco, and other lead agencies, such as Oakland and Pasadena, use maps illustrating areas that exhibit below-threshold VMT to screen out projects that may not require a detailed VMT analysis. Under this approach, travel demand models or survey data provide the existing residential or office VMT, which can be modified for mixed-use projects by using each use-based map as a screen for the respective use-portion of the project, to then develop maps illustrating VMT for different areas in the City. Thus, the maps demonstrate whether a proposed project is in a transportation-efficient location (e.g., transit-oriented infill), with safe and adequate access to a multi-modal transportation system and key destinations, and that will help the City, region, and state reach their GHG reduction targets under Assembly Bill 32.

[39] California Public Resources Code section 21099(b)(1); 14 California Code of Regulations section 15064(b).

This mapping approach for VMT screening has also been recently acknowledged in the Caltrans Local Development Intergovernmental Review Program, Interim Guidance,[40] approved September 2, 2016. This Caltrans Guidance provides further support for use of a map-based screening approach. The Interim Caltrans Guidance replaces Caltrans' 2002 Guidelines, and is part of Caltrans' effort to support smart growth and efficient development. It is intended to help ensure that greenhouse gas emissions reduction, good community design, improved proximity to key destinations, and a safe multi-modal transportation system are all integral parts of the land use decision-making process.

The following identifies thresholds of significance and screening criteria used to determine if a land use project or plan would result in significant impacts under the VMT metric.

- For residential projects, a project would generate substantial additional VMT if it exceeds the regional household VMT per capita minus 15 percent. This metric is consistent with OPR's proposed transportation impact guidelines stating that a project would cause substantial additional VMT if it exceeds both the existing city household VMT per capita minus 15 percent and existing regional household VMT per capita minus 15 percent.
- For office projects, a project would generate substantial additional VMT if it exceeds the regional VMT per employee minus 15 percent.
- For retail projects, the planning department uses a VMT efficiency metric approach for retail projects: a project would generate substantial additional VMT if it exceeds the regional VMT per retail employee minus 15 percent.
- For mixed-use projects, each proposed land use is evaluated independently, per the significance criteria described above.

This approach is consistent with CEQA section 21099 and the thresholds of significance for other land uses recommended in OPR's Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA[41] (proposed transportation impact guidelines). OPR described a 15 percent threshold below existing development as being "both reasonably ambitious and generally achievable" for the following reasons.

First, section 21099 states that the criteria for determining significance must "promote the reduction in greenhouse gas emissions." It also states the legislature's intent that the analysis of transportation in CEQA better promote the state's goals of reducing greenhouse gas emissions. It cites in particular the reduction goals in the Global Warming Solutions Act and the Sustainable Communities and Climate Protection Act, both of which call for substantial reductions. The

[40] California Department of Transportation, Local Development – Intergovernmental Review Program Interim Guidance: Implementing Caltrans Strategic Management Plan 2015–2020 Consistent with SB 743 (Steinberg 2013). Approved September 2, 2016.

[41] This document is available online at http://www.opr.ca.gov/docs/Revised_VMT_CEQA_Guidelines_Proposal_January_20_2016.pdf, p. III:20, accessed May 25, 2018.

California Air Resources Board established long-term reduction targets for the largest regions in the state that ranged from 13 to 16 percent.

Second, Caltrans has developed a statewide VMT reduction target in its Strategic Management Plan. Specifically, it calls for a 15 percent reduction in per capita VMT, compared to 2010 levels, by 2020.

Third, according to the California Air Pollution Control Officers Association (CAPCOA), 15 percent reductions in VMT are typically achievable at the project level in a variety of place types.[42]

Fourth, the First Update to the Assembly Bill 32 Scoping Plan states, "[r]ecognizing the important role local governments play in the successful implementation of AB 32, the initial Scoping Plan called for local governments to set municipal and communitywide GHG reduction targets of 15 percent below then-current levels by 2020, to coincide with the statewide limit."[43]

Table 4.C.10: Average Daily Vehicle Miles Traveled – Existing Conditions presents a comparison of the VMT significance standards (Bay Area VMT minus 15 percent) to VMT data for TAZ 709, the TAZ in which the project site is located.

Table 4.C.10: Average Daily Vehicle Miles Traveled – Existing Conditions

Land Use	Bay Area VMT		TAZ 709
	Regional Average	Regional Average minus 15%	
Households (Residential)	17.2	14.6	7.3
Employment (Office)	19.1	16.2	10.1
Visitors (Retail)	14.9	12.6	8.3

Source: San Francisco Planning Department Transportation Information Map, accessed May 25, 2018

In addition to the map-based screening criterion, OPR has a Proximity to Transit Stations screening criterion that the City uses. OPR recommends that residential, retail, and office projects, as well projects that are a mix of these uses, proposed within one half of a mile of an existing major transit stop (as defined by CEQA section 21064.3) or an existing stop along a high-quality transit corridor (as defined by CEQA section 21155) would not result in a substantial increase in VMT. However, this presumption would not apply if the project would: (1) have a floor area ratio of less than 0.75; (2) include more parking for use by residents, customers, or

[42] California Air Pollution Control Officers Association, *Quantifying Greenhouse Gas Mitigation Measures: A Resource for Local Government to Assess Emission Reductions from Greenhouse Gas Mitigation Measures*, August 2010, p. 55, http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf, accessed May 25, 2018.

[43] California Air Resources Board, *First Update to the AB 32 Scoping Plan*, May 2014, p. 113, https://www.arb.ca.gov/cc/scopingplan/document/updatedscopingplan2013.htm, accessed May 25, 2018.

employees of the project than required or allowed, without a conditional use; or (3) is inconsistent with the applicable Sustainable Communities Strategy.[44]

OPR's proposed transportation impact guidelines do not provide screening criteria or thresholds of significance for other types of land uses, other than those projects that meet the definition of a small project, which does not apply to the proposed project. Therefore, the planning department provides additional screening criteria and thresholds of significance to determine if land uses similar in function to residential, office, and retail would generate a substantial increase in VMT.[45] The proposed project and project variant both include daycare uses, which fall under the screening criteria. Trips associated with daycare uses typically function similarly to trips associated with office uses. While some of these uses may have some visitor/customer trips associated with them (e.g., daycare drop-off), those trips are often a side trip within a larger tour. For example, the visitor/customer trips are influenced by the origin (e.g., home) and/or ultimate destination (e.g., work) of those tours. Therefore, these land uses are treated as office for screening and analysis.

Induced Automobile Travel Analysis

The proposed project or project variant would be a mixed-use development project that includes an internal network of walkways and paths, bicycle and pedestrian facilities, and intersection traffic control devices, including a traffic circle, and off-site improvements, including removal of channelized right-turn lanes, sidewalk widening and crosswalk upgrades.

Transportation projects may substantially induce additional automobile travel. However, OPR's proposed transportation impact guidelines include a list of transportation project types that would not likely lead to a substantial or measureable increase in VMT. If a project fits within the general types of projects (including combinations of types) described below, then it is presumed that VMT impacts would be less than significant and a detailed VMT analysis is not required:

- Active Transportation, Rightsizing (aka Road Diet), and Transit Projects:
  - Infrastructure projects, including safety and accessibility improvements, for pedestrians and bicyclists
- Other Minor Transportation Projects:
  - Installation, removal, or reconfiguration of traffic lanes that are not for through traffic, such as left, right, and U-turn pockets, or emergency breakdown lanes that are not used as through lanes
  - Addition of transportation wayfinding signage

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[44] A project is considered to be inconsistent with the Sustainable Communities Strategy if development is located outside of areas contemplated for development in the Sustainable Communities Strategy.

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

- Removal of off- or on-street parking spaces
- Adoption, removal, or modification of on-street parking or loading restrictions (including meters, time limits, accessible spaces, and preferential/reserved parking permit programs)

Transit Analysis

The local and regional transit analysis considers whether the addition of vehicle trips generated by the proposed project or project variant would have an impact on the transit system. The assessment of potential impacts on transit operations focuses on whether vehicles entering/exiting the projects site and queues from the project driveways would affect operations of the 1 California or other Muni lines on the surrounding street network.[46]

The transit analysis also considers the impact of additional transit riders generated by the proposed project or project variant using local and regional screenlines and directional Muni line analysis. Impacts on local and regional transit service were assessed by comparing the projected ridership from the proposed project or project variant with the available transit capacity at the maximum load point of various transit corridors, described above in the "Existing Conditions" subsection under the "Transit Facilities," pp. 4.C.8-4.C.20. Capacity utilization for the weekday a.m. and weekday p.m. peak periods was determined at the maximum load point for each route serving the study area. Capacity utilization relates the number of passengers per transit vehicle to the design capacity of the vehicle. For the local screenline analysis, Muni has established a capacity utilization standard of 85 percent, and for the regional screenline analysis, regional operators have established a capacity utilization standard of 100 percent. These capacity utilization standards were applied to the weekday a.m. and weekday p.m. weekday conditions analyzed.

Existing and baseline ridership and capacity data was obtained from the SFMTA's automated passenger count database and forecasted using the SF-CHAMP model outputs.[47]

Pedestrian Analysis

The pedestrian analysis considers whether the addition of vehicle trips generated by the proposed project or project variant would have an impact on the pedestrian network. The assessment of potential safety impacts on the pedestrian network focuses on whether vehicle queues would affect pedestrians at intersections and garage access points or if project vehicle trip movements would cause potentially hazardous conditions.

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[46] There is no regional public transit service provided in the immediate proximity to the project site.
[47] San Francisco Planning Department, *Transit Data for Transportation Impact Studies Memorandum.* May 2015. The memorandum references SFMTA's 2013 automated passenger count data as a foundation for the baseline and cumulative analysis.

Pedestrian trips generated by the proposed project and project variant include walking trips to and from nearby land uses and to and from the local transit stops. A qualitative assessment of pedestrian conditions was conducted to determine whether pedestrian facilities would be adequate to accommodate pedestrian trips, whether the proposed project or project variant would interfere with pedestrian accessibility, and whether any conditions hazardous to pedestrians would be created.

Bicycle Analysis

The bicycle analysis considers whether the addition of vehicle trips generated by the proposed project or project variant would have an impact on the bicycle network. The assessment of potential safety impacts on the bicycle network focuses on whether vehicle queues would affect bicyclists at intersections and garage access points or if project vehicle trip movements would cause potentially hazardous conditions.

The transportation analysis includes a qualitative assessment of bicycle conditions as they relate to the project site and bicycle parking, and to bicycle circulation in the study area. The analysis discusses bicycle safety and potential conflicts with traffic.

Loading Analysis

The analysis of loading conditions includes quantification of loading demand during the peak hour of loading activities and a comparison of that demand to proposed on- and off-street loading facilities located within the project site. If the demand is not accommodated, then an assessment of the secondary effects is conducted.

Emergency Access

The qualitative discussion of emergency access addresses access to the project site and access for emergency vehicles within the planned circulation pattern.

Construction Analysis

The construction impact evaluation qualitatively addresses temporary construction-related transportation impacts from construction worker trips, haul trips, materials delivery, staging locations, and lanes and/or sidewalk closures, and the potential for these activities to result in substantial interference with pedestrian, bicycle, or vehicle circulation and accessibility to adjoining areas, thereby resulting in potential hazardous conditions.

Travel Demand Analysis

Travel demand refers to the new vehicle, transit, bicycle, and pedestrian trips that would be generated by the proposed project and project variant. The travel demand data relates to localized impacts, not regional metrics such as VMT. Evaluating the travel data is necessary to address potential local effects on traffic hazards, transit, bicycle, pedestrian, emergency access, and loading facilities.

Forecasts of travel demand from the land use assumptions for the proposed project and project variant are presented in detail in a Travel Demand Memorandum, which is summarized below and included in EIR Appendix D.[48] The forecasts are based on methodology in the SF Guidelines and supplemented with information that accounts for the large-scale and mixed-use qualities of the project.

Trip Generation

Table 4.C.11: Person-Trip Generation (Internal and External Trips Combined) presents the weekday daily, a.m. peak hour, and p.m. peak hour person-trip generation estimates (internal and external combined) for the proposed project and project variant. The table presents trips that would occur within the project site (internal trips) and person-trips that would begin or end outside of the project site (external trips).

Table 4.C.11: Person-Trip Generation (Internal and External Trips Combined)

Land Use	Proposed Project				Project Variant			
	Size NOTE A	**Daily**	**A.M. Peak Hour**	**P.M. Peak Hour**	**Size** NOTE A	**Daily**	**A.M. Peak Hour**	**P.M. Peak Hour**
Residential NOTE B	558	5,002	732	865	744	6,670	974	1,155
Office	49,999	905	74	77	-	-	-	-
Retail	40,004	6,000	738	540	34,480	5,172	636	466
Sit-Down Restaurant	4,287	857	71	116	4,287	857	71	116
Composite Restaurant	9,826	5,896	537	796	9,826	5,896	572	796
Daycare	14,690	984	174	177	14,650	984	173	177
Total	-	***19,644***	***2,326***	***2,571***	-	***19,579***	***2,426***	***2,710***

Notes: Numbers may not sum to total due to rounding. Total includes both internal and external person-trips.
"-" indicates value not applicable.
A Size presented as number of dwelling units for residential land use and gross square feet for all other land uses.
B Proposed project assumes 235 one-bedroom and 323 two-bedroom units. Project variant assumes 313 one-bedroom and 431 two-bedroom units.

Source: Kittelson & Associates, Inc. 2017; *SF Guidelines*, 2002; *ITE Manual, 9th Edition*, 2012

48 Kittelson & Associates, Inc., *3333 California Street Travel Demand Memorandum*, March 9, 2018.

As shown in Table 4.C.11, the proposed project would generate 19,644 total daily person-trips on a typical weekday, 2,326 person-trips in the weekday a.m. peak hour, and 2,571 person-trips during the weekday p.m. peak hour (including both trips internal to the project site and external trips to or from locations outside of the project site).

Also as shown in Table 4.C.11, the project variant would generate 19,579 total daily person-trips on a typical weekday, 2,426 person-trips in the weekday a.m. peak hour, and 2,710 person-trips during the weekday p.m. peak hour (including both trips internal to the project site and external trips to or from locations outside of the project site).

Table 4.C.12: Person-Trip Generation (Internal Trip Capture) presents the weekday daily, a.m. peak hour, and p.m. peak hour person-trip generation estimates and internal trip capture rates for the proposed project and project variant.

Internal trip capture is the portion of trips generated by a mixed-use development that both begin and end within the development. These "internal" trips account for a portion of the total development's trip generation without using the external transportation network. As a result, a mixed-use development, such as the proposed project or project variant, creates less demand on the external transportation network than single-use developments generating the same number of trips. Given that the proposed project or project variant would include a mix of different integrated, complementary, and interacting land uses, such as office, retail, restaurants, and residential, and features internal connectivity – walkways, internal streets, and shared parking – the proposed project or project variant is anticipated to result in some level of internal trip capture.

Table 4.C.12: Person-Trip Generation (Internal Trip Capture)

Trip Type	Proposed Project NOTE A				Project Variant NOTE A			
	Weekday A.M. Peak Hour		Weekday P.M. Peak Hour		Weekday A.M. Peak Hour		Weekday P.M. Peak Hour	
	Number	Percent	Number	Percent	Number	Percent	Number	Percent
External	1,917	82.4%	2,086	81.1%	1,966	81.0%	2,189	80.8%
Internal	409	17.6%	485	18.9%	460	19.0%	521	19.2%
Total	***2,326***	***100%***	***2,571***	***100%***	***2,426***	***100%***	***2,710***	***100%***

Notes: Numbers may not sum to total due to rounding. Total includes both internal and external person-trips.
[A] Proposed project assumes 235 one-bedroom and 323 two-bedroom units. Project variant assumes 313 one-bedroom and 431 two-bedroom units.

Source: Kittelson & Associates, Inc. 2017; *SF Guidelines*, 2002; *ITE Manual, 9th Edition*, 2012

The SF Guidelines do not provide a specific methodology to assess the number of trips that could remain within a large, mixed-use project site and these trips would, therefore, be "double counted". Therefore, appropriate refinements to the standard travel demand analysis approach have been made to account for the size and land use mix of the project, which would be expected to have more than the typical proportion of project trips internal to the site than would be assumed using SF Guidelines methodology. To better estimate the trip-making patterns of the proposed project or project variant, a modified trip generation model specific to the proposed project and project variant was developed. The methodology was developed using the National Cooperative Highway Research Program Report 684[49] and the 2010 and 2011 Institute of Transportation Engineers Journal,[50] and is similar to the approach used in the analysis for other recently completed EIRs, including the Mission Rock Project at Seawall Lot 337 and Pier 48, and the Pier 70 Mixed Use District Project.

Internalization is dependent on the quantity and mix of uses as well as the varying levels of activity they generate at various times of day. As a result, the internalization percentage is different for the proposed project and project variant and each time period. The proposed methodology accounts for trips internal to the proposed project or project variant that would still occur but would not be made by automobile or transit, and would instead remain within the project site and would occur by walking, bicycling, and linked trips. The internal trip capture analysis is described more fully in the Travel Demand Memorandum (see EIR Appendix D).

As shown in Table 4.C.12, the proposed project and project variant are estimated to result in an internal trip capture rate of 17.6 percent (409 person-trips) and 19.0 percent (460 person-trips), respectively, during the weekday a.m. peak hour. During the weekday p.m. peak hour, the proposed project and project variant are estimated to result in an internal trip capture rate of 18.9 percent (485 person-trips) and 19.2 percent (521 person-trips), respectively.

Trip Distribution

External trips generated by the proposed project scenarios were distributed to the quadrants of San Francisco (Superdistricts 1, 2, 3, and 4), the East Bay, the North Bay, the South Bay/Peninsula, and outside the region based on the origin/destination of each trip using data from the SF Guidelines and the United States Census Bureau five-year estimates of commute trip travel behavior from the 2011–2015 American Community Survey for Census Tract 154, which includes the project site.

As shown in Table 4.C.13: Vehicle Trip Distribution, the majority of the project-generated vehicle trips would be within San Francisco, with the greatest proportion of trips related to Superdistrict 2 and Superdistrict 1. The remaining trips (about 35 percent) would be relatively

49 Transportation Research Board, National Cooperative Highway Research Program Report 684, *Enhancing Internal Trip Capture Estimation for Mixed-Use Developments*, 2011.

50 Federal Highway Administration and Texas Department of Transportation, *Improved Estimation of Internal Trip Capture for Mixed-Use Development*, February 2010 and Institute of Transportation Engineers Journal, *Alternative Approaches to Estimating Internal Traffic Capture of Mixed-Use Project*, November 2011.

evenly distributed among Superdistricts 3 and 4 and regional destinations (East Bay, North Bay, Peninsula/South Bay, and out of the area).

Table 4.C.13: Vehicle Trip Distribution

Origin/Destination	Proposed Project		Project Variant	
	Weekday A.M. Peak Hour	**Weekday P.M. Peak Hour**	**Weekday A.M. Peak Hour**	**Weekday P.M. Peak Hour**
Superdistrict 1	19%	20%	20%	21%
Superdistrict 2	44%	41%	44%	41%
Superdistrict 3	8%	9%	8%	8%
Superdistrict 4	8%	8%	7%	8%
East Bay	4%	5%	4%	5%
North Bay	4%	4%	4%	4%
South Bay	6%	6%	6%	6%
Out of Area	7%	7%	7%	7%
Total	**100.0%**	**100.0%**	**100.0%**	**100.0%**

Source: Kittelson & Associates, Inc., 2017; *SF Guidelines*, 2002

Travel Modes

Person-trips generated by the proposed project and project variant were distributed to San Francisco's four Superdistricts and the greater Bay Area, and then assigned to travel modes based on mode shares presented in the SF Guidelines in order to determine the number of auto, transit, walk, and "other" trips. The "other" mode includes trips taken by bicycle, motorcycle, for-hire vehicles such as transportation network companies, taxis, and other modes. The person-trips shown as "auto" person trips reflect the total number of persons traveling by automobile and some automobiles would transport more than one person or multiple people, each of whom is making one person trip. Vehicle trips are calculated as the number of auto person trips divided by the average vehicle occupancy. Mode shares and average vehicle occupancy rates for residential work trips are based on United States Census Bureau five-year estimates of commute trip travel behavior from the 2011–2015 American Community Survey for Census Tract 154, which includes the project site. External person-trip generation estimates by mode and vehicle trips are shown in Table 4.C.14: External Person-Trip Generation by Mode.

Based on Table 4.C.14, about 61 percent of daily person-trips generated by the proposed project would be auto person-trips, 14 percent would be transit trips, 21 percent would be walk trips, and 4 percent of trips would be taken by other modes, including bicycles, motorcycles, and for-hire vehicles. The proposed project would generate 1,917 external person-trips, including 1,197 auto person-trips, 295 transit trips, 376 walk trips, and 49 trips by other modes during the weekday a.m. peak hour. During the weekday p.m. peak hour, the proposed project would generate 2,086 external person-trips, including 1,298 auto person-trips, 330 transit trips, 398 walk trips, and 60 trips by other modes. Based on the expected mode share and average vehicle occupancy, the proposed project would generate 807 vehicle-trips during the weekday a.m. peak hour, and 752 vehicle-trips during the weekday p.m. peak hour.

Table 4.C.14: External Person-Trip Generation by Mode

Mode	Proposed Project			Project Variant		
	Daily	**A.M. Peak Hour**	**P.M. Peak Hour**	**Daily**	**A.M. Peak Hour**	**P.M. Peak Hour**
Auto	10,057	1,197	1,298	9,812	1,235	1,349
Transit	2,353	295	330	2,466	324	392
Walk	3,475	376	398	3,290	359	387
Other NOTE A	576	49	60	603	48	61
Total Person-Trips	***16,462***	***1,917***	***2,086***	***16,171***	***1,966***	***2,189***
Vehicle-Trips	**5,760**	**691**	**752**	**5,744**	**726**	**804**

Notes: Numbers may not sum to total due to rounding. Total includes external person-trips.
[A] "Other" mode includes trips taken by bicycle, motorcycle, transportation network companies, and other modes.
Source: Kittelson & Associates, Inc. 2018; *SF Guidelines*, 2002

Based on Table 4.C.14, about 61 percent of daily person-trips generated by the project variant would be auto person-trips, 15 percent would be transit trips, 20 percent would be walk trips, and 4 percent of trips would be taken by other modes, including bicycles, motorcycles, and for-hire vehicles. The project variant would generate 1,966 external person-trips, including 1,235 auto person-trips, 324 transit trips, 359 walk trips, and 48 trips by other modes during the weekday a.m. peak hour. During the weekday p.m. peak hour, the project variant would generate 2,189 external person-trips, including 1,349 auto person-trips, 392 transit trips, 387 walk trips, and 61 trips by other modes. Based on the expected mode share and average vehicle occupancy, the project variant would generate 847 vehicle-trips during the weekday a.m. peak hour and 804 vehicle-trips during the weekday p.m. peak hour.

Overall, on a daily basis, about 23 percent of auto person-trips (24 percent of vehicle trips), 50 percent of transit trips, 14 percent of walk trips, and 42 percent of other trips generated by the proposed project would be generated by the residential use. The general office use would account for about 4 percent of auto person-trips (4 percent of vehicle trips), 9 percent of transit trips, 3 percent of walk trips, and 7 percent of other trips generated by the proposed project. The general retail use would account for about 32 percent of auto person-trips (31 percent of vehicle trips), 18 percent of transit trips, 36 percent of walk trips, and 22 percent of other trips generated by the proposed project. The restaurant uses (quality sit-down restaurant and composite restaurant) would account for about 36 percent of auto person-trips (35 percent of vehicle trips), 20 percent of transit trips, 40 percent of walk trips, and 22 percent of other trips generated by the proposed project. The daycare center would account for the remaining between 3 and 6 percent of trips for each mode. During the weekday a.m. peak hour, the residential use would account for 30 percent of vehicle trips while the office use would account for 4 percent, retail use would account for 31 percent, restaurant uses would account for 28 percent, and daycare center would account for 7 percent. During the weekday p.m. peak hour, the residential use would account for 34 percent of vehicle trips while the office use would account for 3 percent, the retail use would account for 21 percent, restaurant uses would account for 35 percent, and daycare center would account for 7 percent.

Overall, on a daily basis, about 31 percent of auto person-trips (32 percent of vehicle trips), 64 percent of transit trips, 20 percent of walk trips, and 54 percent of other trips generated by the project variant would be generated by the residential use. The general retail use would account for about 28 percent of auto person-trips (27 percent of vehicle trips), 14 percent of transit trips, 32 percent of walk trips, and 18 percent of other trips generated by the project variant. The restaurant uses (quality sit-down restaurant and composite restaurant) would account for about 37 percent of auto person-trips (35 percent of vehicle trips), 19 percent of transit trips, 42 percent of walk trips, and 24 percent of other trips generated by the project variant. The daycare center would account for the remaining between 3 and 5 percent of trips for each mode. During the weekday a.m. peak hour, the residential use would account for 39 percent of vehicle trips while the retail use would account for 26 percent, restaurant uses would account for 28 percent, and daycare center would account for 7 percent. During the weekday p.m. peak hour, the residential use would account for 35 percent of vehicle trips while the retail use would account for 12 percent, restaurant uses would account for 46 percent, and daycare center would account for 6 percent.

Trip generation by land use and by mode is documented in the Travel Demand Memorandum and its technical appendix (see EIR Appendix D).

Trip Credits/Net New Vehicle Trips

The project site is currently occupied by a 362,000-gross-square-foot, four-story office building with a three-level, partially below-grade parking structure with 212 spaces; a one-story, 14,000-gross-square-foot annex building; and three surface parking lots with 331 vehicle parking spaces. To account for the existing activity at the site, field observations and counts were conducted at the site access points during the weekday a.m. and p.m. peak periods on a typical day of activity at the site: Thursday, December 1, 2016. Based on vehicle turning movement counts collected at the site driveways (California Street/Walnut Street, Mayfair Drive/Laurel Street, and the Laurel Street driveway between Mayfair Drive and Euclid Avenue), the existing use was observed to generate 266 vehicle-trips (190 inbound, 76 outbound) and 296 vehicle-trips (102 inbound, 194 outbound) during the weekday a.m. and p.m. peak hours, respectively. Vehicle-trip credits were applied to the external vehicle-trip generation estimates to calculate the net-new weekday a.m. and p.m. peak hour vehicle-trip generation for the proposed project and project variant, as summarized in Table 4.C.15: Net-New External Vehicle-Trips.

Table 4.C.15: Net-New External Vehicle-Trips

Scenario	Weekday A.M. Peak Hour			Weekday P.M. Peak Hour		
	In	Out	Total	In	Out	Total
Existing Uses	190	76	266	102	194	296
Proposed Project	312	379	691	418	334	752
Net-New	*122*	*303*	*425*	*316*	*140*	*456*
Project Variant	304	422	726	482	322	804
Net-New	*114*	*346*	*460*	*380*	*128*	*508*

Source: Kittelson & Associates, Inc. 2018; Quality Counts, 2016. See EIR Appendix D, Attachment D.

The net-new external vehicle-trip generation estimates represent the anticipated increase in weekday a.m. and p.m. peak hour vehicle trips resulting from the proposed project and project variant, as compared to existing conditions. As shown in Table 4.C.15, after applying the vehicle trip credits based on existing activity at the project driveways, the proposed project would generate a total of 425 net-new external vehicle-trips (122 inbound, 303 outbound) during the weekday a.m. peak hour and 456 net-new external vehicle-trips (316 inbound, 140 outbound) during the weekday p.m. peak hour. The project variant would generate a total of 460 net-new external vehicle-trips (114 inbound, 346 outbound) during the weekday a.m. peak hour and 508 net-new external vehicle-trips (380 inbound, 128 outbound) during the weekday p.m. peak hour.

Freight Delivery and Service Vehicle Demand

Freight loading demand consists of the number of delivery and service vehicle-trips generated by a project. The number of daily delivery/service vehicle trips is estimated based on the size of each land use and a truck trip generation rate (specific to each land use). The number of freight loading spaces necessary to accommodate this demand is based on the anticipated hours of operation, turnover of loading spaces, and an hourly distribution of trips. The information and rates used in the loading demand analysis were obtained from the SF Guidelines for the proposed land uses. To provide a conservative estimate of freight loading, no credits were applied to existing freight loading. Freight loading demand for the proposed project scenarios is summarized in Table 4.C.16: Freight Loading Demand.

As shown in Table 4.C.16, the proposed project would generate a demand for about 96 delivery/service vehicle-trips per day and is estimated to result in a demand for about 5 loading spaces during the average hour and about 6 loading spaces during the peak hour of loading activity. The project variant would generate a demand for about 89 delivery/service vehicle-trips per day and would result in a demand for about 5 loading spaces during the average hour and about 6 loading spaces during the peak hour of loading activity.

Table 4.C.16: Freight Loading Demand

Land Use	Proposed Project				Project Variant			
	Size (Gross Square Feet)	**Daily Truck Trip Generation**	**Average Hour Loading Space Demand**	**Peak Hour Loading Space Demand**	**Size (Gross Square Feet)**	**Daily Truck Trip Generation**	**Average Hour Loading Space Demand**	**Peak Hour Loading Space Demand**
Residential	824,691	24.7	1.2	1.4	978,611	29.4	1.4	1.7
Office	49,999	10.5	0.5	0.6	-	-	-	-
Retail	40,004	8.8	0.4	0.5	34,480	7.6	0.4	0.4
Sit-Down Restaurant	4,287	15.4	0.7	0.9	4,287	15.4	0.7	0.9
Composite Restaurant **NOTE A**	9,826	35.4	1.6	2.1	9,826	35.4	1.6	2.1
Daycare	14,690	1.5	0.1	0.1	14,650	1.5	0.1	0.1
Total	*943,497*	*96.3*	*4.5*	*5.6*	*1,041,854*	*89.3*	*4.2*	*5.2*

Notes: Loading demand is presented as the number of delivery/service vehicle trips per time period. The peak period of loading demand typically occurs between 10 a.m. and 1 p.m. and does not coincide with the weekday a.m. and p.m. peak periods.

Loading Demand Equation: Daily Trips = (GSF / 1,000) * R; Average Hour = (GSF / 1,000) * R / 9 / 2.4; Peak Hour = (GSF / 1,000) * (R * 1.25) / 9 / 2.4

[A] Composite restaurant is a fast casual or casual-style restaurant which offers table-side service.

Source: Kittelson & Associates, Inc. 2017; *SF Guidelines*, 2002

Passenger Loading Demand

Passenger loading demand is estimated for the proposed project and project variant to evaluate whether adequate space to accommodate curbside passenger pick-up/drop-off is provided. The extent of curbside space needed to accommodate this demand is based on the trip generation rates and methodology outlined in the SF Guidelines, Appendix H. The passenger loading demand and curbside loading space needs for the proposed project and project variant are detailed in the Travel Demand Memorandum (see EIR Appendix D). To provide a conservative estimate of passenger loading, no credits were applied to existing passenger loading. Passenger loading associated with the daycare center would be accommodated within Basement Level B3 of the California Street Garage in the dedicated parking spaces near the daycare facility's elevator lobby and would not occur within the proposed on-street curbside passenger loading spaces along Masonic Avenue, Euclid Avenue or Laurel Street (see Chapter 2, Project Description, Figure 2.22 and Figure 2.25: Proposed California Street Garage and Center Building B Garage -Basement Level B3, pp. 2.61 and 2.67).

A portion of the "other" trips would be for-hire vehicle trips such as taxi or transportation network company trips and would result in passenger pick-up/drop-off activities. Assuming all "other" trips are taxi or transportation network company trips,[51] the proposed project would generate 49 passenger drop-off/pick-up trips (24 drop-off, 25 pick-up) during the weekday a.m. peak hour and 60 passenger drop-off/pick-up trips (31 drop-off, 29 pick-up) during the weekday p.m. peak hour. About 30 vehicles would be anticipated to arrive during the peak 15-minute period, resulting in a peak demand for passenger loading during any one-minute equivalent to about three vehicles. Assuming an average vehicle length of 20 feet, this would be equivalent to about 60 linear feet of curb.

Assuming all "other" trips are taxi or transportation network company trips, the project variant would generate 48 passenger drop-off/pick-up trips (23 drop-off, 25 pick-up) during the weekday a.m. peak hour and 61passenger drop-off/pick-up trips (34 drop-off, 27 pick-up) during the weekday p.m. peak hour. About 31 vehicles would be anticipated to arrive during the peak 15-minute period, resulting in a peak demand for passenger loading during any one-minute equivalent to about four vehicles. Assuming an average vehicle length of 20 feet, this would be equivalent to about 80 linear feet of curb.

Future 2040 Cumulative Transportation Methodology

The cumulative impact analysis evaluates the long-term effects associated with full buildout of the proposed project or project variant following construction, based on future year 2040 conditions.

Cumulative VMT Methodology

OPR's proposed transportation impact guidelines do not specify a separate methodology for analyzing cumulative impacts using a VMT metric. Under CEQA, a project is considered to have "cumulatively considerable" impacts if the incremental effects of the individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects (CEQA Guidelines section 15065(a)(3)).

VMT by its very nature is largely a cumulative impact. In general, no single project by itself would be sufficient in size to prevent the region or state from meeting its VMT (and GHG) reduction goals. Rather, an individual project's VMT contributes cumulatively to the physical secondary environmental impacts associated with the VMT resulting from the distance that existing, currently proposed, and future projects would be expected to cause people to drive. VMT (and induced automobile travel) project-level significance thresholds are based on whether project VMT levels would be consistent with state and regional long-term greenhouse gas emission reduction targets and corresponding VMT per capita reduction targets.

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[51] This assumption is conservative because it assumes that there are no linked trips, i.e., a driver would not drop off one person and then pick up another from the same location.

The planning department has determined that a project's incremental VMT effects are not cumulatively considerable if the project site is located in an area where per capita VMT is more than 15 percent below the projected 2040 per capita regional average daily VMT for residential, office, and retail uses. This is an appropriate metric to assess cumulative VMT impacts, for the reasons set forth below.

The transportation authority uses SF-CHAMP to estimate VMT for different land use types within individual TAZs. For the cumulative scenario, San Francisco 2040 cumulative VMT conditions, including cumulative VMT conditions for the TAZ in which the project is located, were projected using a SF-CHAMP model run. This model run uses the same methodology as outlined for existing conditions, but includes forecasts of residential and job growth estimates and reasonably foreseeable transportation investments through 2040, based on the Association of Bay Area Governments' most recent Projections 2013 (with projected citywide growth in population and employment allocated to individual TAZs by the planning department).

As stated above, OPR's proposed use of a VMT metric is intended to implement Senate Bill 743's mandate to establish criteria for determining the significance of projects' transportation impacts that promote the "reduction of greenhouse gas emissions." Notably, San Francisco has been shown to have a significantly lower per-household carbon footprint than most other cities and counties in the San Francisco Bay Area region. Specifically, a December 2015 greenhouse gas consumption study published by the University of California, Berkeley, and funded by the Bay Area Air Quality Management District (air district),[52] concluded that the average San Francisco household produces 38.7 metric tons of carbon dioxide equivalents (CO2e) annually, which is 12.7 percent lower than the overall San Francisco Bay Area average household emissions of 44.3 metric tons of CO2e.

Maintaining per capita VMT that is 15 percent or more below the regional average is an essential component of the City's aggressive GHG reduction targets. Specifically, Ordinance No. 81-08, adopted in May 2008, established targets, including reducing GHG emissions by 25 percent below 1990 levels by 2017; reducing GHG emissions by 40 percent below 1990 levels by 2025; and reducing GHG emissions by 80 percent below 1990 levels by 2050 (which targets are consistent with – and in fact more ambitious than – those set forth in Governor Brown's recent Executive Order B-30-15 by targeting a 40 percent reduction by 2025 rather than by 2030).

Similarly, reducing per capita VMT is also a key component of the City's local GHG reduction plan, Strategies to Address Greenhouse Gas Emissions, recognized by the air district as meeting

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[52] Jones, Christopher and Daniel Kammen, *A Consumption-Based Greenhouse Gas Inventory of San Francisco Bay Area Neighborhoods, Cities and Counties: Prioritizing Climate Action for Different Locations*, December 2015, University of California, Berkeley, and Bay Area Air Quality Management District, http://www.baaqmd.gov/research-and-data/emission-inventory/consumption-based-ghg-emissions-inventory, accessed May 25, 2018.

the criteria of a qualified GHG Reduction Strategy. The City's Greenhouse Gas Reduction Strategy includes 30 specific regulations for new development that would reduce a project's GHG emissions. In fact, GHG reduction actions in San Francisco have resulted in a 23.3 percent reduction in GHG emissions in 2012 compared to 1990 levels, exceeding the year 2020 reduction goals in the air district's Bay Area 2010 Clean Air Plan, Executive Orders S-3-05 and B-30-15, and Assembly Bill 32. By complying with and exceeding Plan Bay Area targets, San Francisco is on a trajectory to meet the GHG reduction goals established by Assembly Bill 32 and Senate Bill 375.

The planning department's cumulative significance threshold of 15 percent below 2040 per capita regional average daily VMT by use category, is consistent with the sustainability targets of the *Plan Bay Area* adopted in 2013 (Plan Bay Area 2013). The project site is located in a TAZ with average daily VMT per capita for the mix of uses under the proposed project or project variant that is more than 15 percent below the regional averages by use, and site redevelopment would be evaluated for consistency with Plan Bay Area 2013 sustainability targets.

Plan Bay Area 2013 is designed to reach greenhouse gas reductions established by the California Air Resources Board for the Bay Area region, which targets include a 7 percent per capita reduction by 2020 and a 15 percent per capita reduction by 2035.[53] Plan Bay Area 2013 identified 10 performance targets, which include both mandatory and voluntary targets. One of the mandatory performance targets requires the Bay Area to reduce its per-capita CO2 emissions from cars and light duty trucks by 15 percent by 2040. Plan Bay Area 2013 achieves this milestone.[54] One of the voluntary targets includes decreasing automobile VMT per capita by 10 percent.[55] Plan Bay Area 2013 states that the average Bay Area resident traveled about 22 miles by car on a typical weekday in 2005; by 2040, the average resident is expected to travel 20 miles per day, a reduction of 9 percent. This near-achievement of the per-capita VMT target reflects the carefully targeted locations of envisioned housing and commercial development in Priority Development Areas with excellent transit service.[56] Even though Plan Bay Area 2013 achieves VMT reductions of 9 percent, which does not fully achieve the adopted 10 percent reduction target, Plan Bay Area 2013 nonetheless achieves the mandatory performance target to reduce per-capita CO2 emissions from cars and light duty trucks by 15 percent by 2040.[57]

[53] Association of Bay Area Governments and Metropolitan Transportation Commission, *Plan Bay Area*, July 18, 2013 (hereinafter "Plan Bay Area 2013"), p. 4.
[54] Plan Bay Area 2013, p. 5.
[55] Ibid, p. 106.
[56] Ibid.
[57] Ibid, p. 5.

Future 2040 Transportation Network Improvements

For the purposes of the transportation analysis for this EIR, the following transportation network improvements were assumed to be in place as part of the 2040 cumulative conditions.

- Geary Bus Rapid Transit. The Final EIR was certified by the San Francisco County Transit Authority Board on January 5, 2017.[58] The Geary Bus Rapid Transit system would be implemented in two phases. Phase 1 includes all improvements between Market and Stanyan streets. Phase 2 includes the remaining improvements in the Richmond District.
    - Phase 1: Implementation of Phase 1 is underway with the painting of the bus-only lanes and stop changes between Market and Stanyan streets. Other upgrades such as the installation of new traffic signal infrastructure and new pedestrian and bus bulbs would follow, with completion anticipated in 2021.
    - Phase 2: Next steps for Phase 2 including conceptual engineering, final design, approvals, and construction. Following additional design work, a more detailed construction schedule will be developed. Improvements would include many of the same features as Phase 1, i.e. painted bus only lanes, new traffic signal infrastructure, new pedestrian and bus bulbs, and sidewalk widening. Construction is anticipated to start in 2019, with anticipated completion in 2021.
- Muni Forward. The Muni Forward project provided a thorough review of San Francisco's public transit system by SFMTA. Based on this review, the SFMTA developed Muni Forward proposals aimed at improving reliability, reducing travel times, providing service that is more frequent, and updating Muni bus routes and rail lines to better match travel patterns. Muni Forward projects are being implemented based on funding and resource availability. Muni Forward recommendations included new routes and route realignments, more service on busy routes, and elimination or consolidation of certain routes or route segments with low ridership. Changes proposed by Muni Forward for routes serving the study area that are considered part of the 2040 cumulative conditions are shown in Table 4.C.17: Proposed Muni Forward Changes. Infrastructure improvements identified under Muni Forward, e.g., the transit bus bulbout at southeast corner of California and Laurel streets and the Muni stop shift (from the southwest corner to the southeast corner) would be implemented as part of the California Laurel Village Improvement Project, and, as noted above under "Baseline," p. 4.C.28, would be in place by November 2018.

[58] San Francisco County Transportation Authority, Geary Corridor Bus Rapid Transit Project Final Environmental Impact Report Certification Resolution, January 5, 2017, https://www.sfcta.org/sites/default/files/content/Executive/Meetings/board/2017/01-Jan/Signed-resos/R17-21%20Geary%20BRT%20Final%20EIR%20Certification.pdf , accessed September 7, 2018.

Table 4.C.17: Proposed Muni Forward Changes

Route	Proposed Muni Forward Changes
1 California	–Commute frequency would increase from every seven minutes to every six minutes.
1BX California A Express	–New transit stop would be added on Pine Street (p.m.) and Bush Street (a.m.) at Van Ness Avenue to improve transit connections to the Civic Center and the northern waterfront. –TTRP.1 is also proposed for the California Street corridor to reduce transit travel time. Certain changes to implement TTRP.1, such as transit stop relocations and bulb-outs at the northeast and southeast corners of Laurel Street/California Street would be implemented under baseline conditions.
2 Clement	–The recommended alternative for the 2 Clement service proposes an alternative alignment that would use existing overhead wires for trolley coach service on the entire route. –Instead of operating on Clement Street from Arguello Boulevard to Park Presidio Boulevard, the route would continue on California Street to Eighth Avenue, then south to Clement Street, east to Sixth Avenue and north to the California Street/Sixth Avenue terminal. This service variant would include a terminal loop at Sansome Street in the Downtown area. –Supplemental trolley coach service would be added between Downtown (Sansome/Market Streets) and Presidio Avenue to improve current transit frequencies on Sutter and Post Streets due to the reduced 3 Jackson service on this segment. –A 2 Clement service variant would continue service to the current terminal on Clement Street and 14th Avenue.
3 Jackson	–Commute frequency would increase on Sutter Street to every five minutes. –Transit headways on Sutter Street would be increased by adding supplemental trolley coach service on the 2 Clement between Downtown and Presidio Avenue. –Midday service frequency may be reduced from 20 minutes to 30 minutes.
38 Geary	–Midday frequency would increase from 16 to 15 minutes west of 33rd Avenue.

Note: TTRP refers to Muni Forward Travel Time Reduction Proposals.

Source: SFMTA, Transit Effectiveness Project Implementation Workbook, accessed September 28, 2017

Future 2040 Development Projects

In addition to the transportation improvements listed above, the cumulative transportation impact analysis includes forecasted growth in jobs and employment in San Francisco by the year 2040. The model includes a comprehensive projection of growth based on known and forecast development, including growth under adopted area plans that could affect San Francisco's transportation network. This growth includes, but is not limited to, the following:

- 2670 Geary Boulevard (Case No. 2014.002181). This project involves demolishing the existing one-story former restaurant and constructing an eight-story mixed-use building with 95 residential dwelling units above approximately 1,756 square feet of ground-floor commercial space and 16 off-street parking spaces.

- 3700 California Street (or California Pacific Medical Campus relocation and redevelopment) (Case No. 2017-003559ENV). The 213,733-square-foot project site spans 14 parcels on three blocks bounded by California Street to the south, Arguello Boulevard to the west, Sacramento Street to the north, and Spruce Street to the east in the Presidio Heights neighborhood. The project site contains seven buildings with hospital, medical office, and parking uses, and one nine-unit residential building at 401 Cherry Street. The project would demolish five buildings and retain and renovate the 401 Cherry Street residential building and the three-story medical building (former Marshall Hale Hospital) at 3698 California Street. The Marshall Hale building is proposed to become a 24-unit residential building. Thirty-one new residential buildings, consisting of 14 single-family homes and 17 multi-family buildings, ranging in height from three to seven stories (36 to 80 feet), would be constructed. In total the project site would result in 33 buildings containing 273 dwelling units (9 existing and 264 new); 416 vehicle parking spaces; 433 bicycle parking spaces; and approximately 86,200 square feet of private and common open space. To accommodate the construction of the new buildings, the project would require excavation of approximately 61,800 cubic yards of soil to a maximum depth of 75 feet. There would be approximately 24,363 cubic yards of debris removal related to the demolition of existing structures on the project site.[59,60]

The cumulative transportation analysis is projection-based; therefore, the projects listed here are examples of those that are accounted for in the growth forecast used in the travel demand forecasting model. The model includes a comprehensive projection of growth that is reasonably foreseeable in 2040, based on known and forecast development including growth under adopted area plans that could affect San Francisco's transportation network.

Cumulative Transportation Demand

Future year 2040 cumulative roadway volumes were derived from outputs from the transportation authority's travel demand forecasting model (SF-CHAMP). The SF-CHAMP model is an activity-based travel demand model that has been validated to represent existing and future transportation conditions in San Francisco. The model predicts all person-trips for a full day based on total and locations of population, housing units, and employment, which are then allocated to different periods throughout the day, using time of day sub-models. The model predicts person travel by mode for walking, auto, transit, and bicycle trips. The model also provides forecasts of vehicular traffic on regional freeways and major arterials and on the study area local roadway network, considering the available roadway capacity, origin-destination demand, and travel speeds when assigning the future travel demand to the roadway network.

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[59] San Francisco Planning Department, Notice of Preparation of an Environmental Impact Report, 3700 California Street, September 19, 2018 (Case No. 2017-003559ENV), http://sfmea.sfplanning.org/NOP_9.19.18_web.pdf, accessed October 15, 2018.

[60] Michael Keinath, Ramboll, e-mail correspondence with Debra Dwyer, Principal Planner, San Francisco Planning Department, September 25, 2018.

Future year 2040 cumulative transit ridership projections were developed based on transit growth projections developed for Muni Forward. Forecast future hourly ridership demand was then compared to expected hourly capacity, as determined by the likely route and headway changes to estimate capacity utilization under 2040 cumulative conditions.

IMPACT EVALUATION

CONSTRUCTION IMPACTS

Impact TR-1: Construction of the proposed project or project variant would not result in substantial interference with pedestrian, bicycle, or vehicle circulation and accessibility to adjoining areas thereby resulting in potentially hazardous conditions. (*Less than Significant*)

The discussion of construction impacts is based on currently available information from the project sponsor, as summarized in Chapter 2, Project Description, pp. 2.92-2.97, local and state regulations regarding use of the public right-of-way, and experience with typical construction practices in San Francisco. Buildout of the proposed project or project variant is anticipated to occur in four phases over a 7- to 15-year timeline. See discussion under "Preliminary Construction Schedule and Phasing" on p. 4.C.45. Construction impacts would be the same for both the proposed project and project variant with either construction timeline.

Changes to the transportation circulation network in the project area related to construction activities would be conducted in compliance with City codes and regulations, which typically ensure that construction activities do not result in potentially hazardous conditions for people walking, bicycling, taking transit and/or transit operations, as well as people driving.

Regulations Related to Construction-Related Transportation Impacts

Construction activities in San Francisco that have the potential to affect the transportation network are subject to the San Francisco Municipal Transportation Agency's *Regulations for Working in San Francisco Streets*, also known as the "blue book," as well as the public works code and public works department orders.[61] The authority for the blue book is derived from the San Francisco Transportation Code and primarily addresses construction activities affecting the public right-of-way. The blue book is a manual for City agencies (public works, SFMTA, public utilities commission, the port, etc.), utility crews, private contractors, and others doing work in San Francisco's public rights-of-way, and it establishes rules for working safely and in a manner that will cause the least possible interference with people walking, bicycling, taking transit and/or transit operations, as well as people driving. Should project construction activities not comply

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[61] San Francisco Municipal Transportation Agency, City and County of San Francisco Regulations for Working in San Francisco Streets, 8th Edition, January 2012, https://www.sfmta.com/sites/default/files/reports-and-documents/2017/10/blue_book_8th_edition_pdf.pdf, accessed June 12, 2018.

with regulations in the blue book, the contractor must apply for a special traffic permit from the SFMTA. SFMTA staff would specify conditions in the special traffic permit to ensure the safety of all travel modes in and around the project site. With respect to public works, it is the policy of public works that a safe and accessible path of travel be provided for all people walking, including those with disabilities, around and/or through construction sites.[62] To that end, the public works code includes requirements related to excavation in the public right-of-way and may require the development and implementation of a contractor parking plan. In addition to blue book and public works regulations, contractors are responsible for complying with all City, state and federal codes, rules and regulations.

As stated above, project construction activities that do not comply with regulations in the blue book require a special traffic permit from the SFMTA, which would specify conditions for ensuring safety for all travel modes in and around the project site. Examples of the types of work addressed through special traffic permits include all sidewalk and walkway closures, and all alley and street closures, temporary relocation of transit stops and/or routes, and closing or detouring a bicycle route. Additionally, all traffic control implemented as part of any special traffic permit conditions would be required to conform to the *California Manual of Uniform Traffic Control Devices*.[63]

Construction activities in San Francisco may be conducted between 7:00 a.m. and 8:00 p.m. daily.[64] Outside of those hours, night time construction activities, particularly related to noise, would be subject to a special permit as described in Article 29 of the police code. Construction-related activities for the proposed project or project variant generally would occur weekdays from 7:00 a.m. to 7:00 p.m. Construction is not anticipated to occur on the weekends or major legal holidays, but may occur on these days occasionally on an as-needed basis from 7:00 a.m. to 3:30 p.m. Should a special permit be issued, the hours of construction would be stipulated in the conditions of the permit by the relevant City agencies. Pursuant to public works code section 2.4.20, Action on Applications to Excavate, contractors are required to submit a contractor parking plan to public works for any permit application for major work that is 30 consecutive calendar days or longer.[65] The major requirements of the contractor parking plan include: identification of on-street parking spaces affected during construction, identification of on-street staging areas, the average number of construction personnel at the work site, the

[62] San Francisco Public Works, *Guidelines for the Placement of Barricades at Construction Sites* (ORDER NO. 167,840), 2008, http://sfpublicworks.org/sites/default/files/Guidelines_for_Placement_of_Barricades_0.pdf, accessed June 12, 2018.

[63] California Department of Transportation, 2014 California Manual of Uniform Traffic Control Devices Rev 3, March 2018, http://www.dot.ca.gov/trafficops/camutcd/, accessed June 12, 2018.

[64] San Francisco Department of Building Inspection, Frequently Asked Questions, November 2014, http://sfdbi.org/frequently-asked-questions, accessed June 12, 2018.

[65] San Francisco Public Works Code Section 2.4.20, Action on Applications for Permits to Excavate, http://library.amlegal.com/nxt/gateway.dll/California/publicworks/publicworkscode?f=templates$fn=default.htm$3.0$vid=amlegal:sanfrancisco_ca$sync=1, accessed June 12, 2018.

timeline and phasing of the project, the process for updates to public works, the availability of on-site parking opportunities, a proposal to reduce parking demand related to construction activities, and a proposal to make parking available for the public during those times when no work is scheduled. These requirements are intended to minimize the inconvenience to the neighborhood related to on-street parking availability within the project vicinity during project construction.

PROJECT CONSTRUCTION

Preliminary construction information has been developed by the sponsor and their contractor for the purpose of environmental review, but is subject to change once construction level plans are available and the construction logistics are reviewed by City agencies, as required. Regardless, the project sponsor would be required to comply with City regulations described above during all phases of project construction. Table 4.C.18: Construction Activity by Phase provides the anticipated duration for each of the four major phases of construction, and the average and maximum numbers of daily construction truck trips and workers.

Table 4.C.18: Construction Activity by Phase

Project Phase / Elements	Work Days	Construction Workers		Daily Truck Trips NOTE A	
		Average	Maximum	Average	Maximum
1 – Masonic/Euclid buildings	645	90	175	60	80
2 – Center Buildings A/B	515	75	150	10	10
3 – Plaza A/Plaza B/Walnut buildings	773	90	175	60	80
4 – Mayfair Building/Laurel Duplexes/ Euclid Park	429	75	175	60	80

Note:
A Number of daily truck trips reflects truck trips that would occur during demolition and excavation period.

Source: P/SKS and Webcor, Construction Phasing Documents, September and October 2017

At the onset of Phase 1, the entire site would accommodate construction staging and construction worker parking. As shown on the phasing diagram and logistics drawings (see Chapter 2, Project Description, Figure 2.30: Proposed Construction Phasing Diagram, p. 2.90), most construction vehicle and worker access would be contained on the project site. During Phase 1, activities in the public right of way would include installation of a new sewer line on Masonic Avenue and installation of a new gas line on both Euclid and Masonic avenues. No temporary parking lane or sidewalk closures would be required during Phase 1 or Phase 2 and parking for construction workers would be provided on site.

Temporary parking lane and sidewalk closures would be required during Phase 3 and Phase 4 of construction. Phase 3 and Phase 4 would require some staging on the sidewalk and parking lane along California and Laurel streets. Additionally, the parking lane on Masonic Avenue between Presidio and Euclid avenues would be used intermittently, as needed, for concrete truck staging subject to the conditions of a special traffic permit. The closures would be required to comply with the blue book regulations, would be subject to review by the SFMTA, and would be coordinated with City staff to minimize effects on people walking or taking transit, transit operations, local traffic, and circulation. The project sponsor and construction contractor(s) would prepare a construction logistics plan for each phase of construction for review and discussion with the SFMTA, who would identify the construction activities subject to special traffic permits and specify conditions, as appropriate. Proposed right-of-way changes for construction activities may be subject to review by the City's Transportation Advisory Staff Committee (TASC). TASC consists of representatives of City departments, including the transportation agency, public works, the fire department, police department, health department, the port, and the taxi commission.

Adherence to the established guidance in the blue book would ensure that construction work can be done both safely and with the least possible interference with pedestrians, bicycle, transit and vehicular traffic. Per requirements outlined in the blue book (Chapter 5 and Appendix E), any sidewalk closure, walkway closure or any other work that does not provide a continuous four-foot wide clear path of travel on the same side of the street would require a special traffic permit issued by SFMTA. The special traffic permit requires that the contractor post and maintain the appropriate pedestrian signs.[66] As part of the California Laurel Village Improvement Project, public works is building transit bulbs on the northeast and southeast corners of the California Street/Laurel Street intersection. These transit bulbs will extend along California Street at these corners for 90 feet from the intersection to the curb return. Temporary parking lane closures on California Street would block or impede bus movements into and out of the bus stop that will be located on the southeast corner of the California Street/Laurel Street intersection. Per requirements outlined in the blue book (Chapter 7.1), the contractor would request authorization for any work that may interfere with any existing passenger loading and unloading operation at least 10 days in advance of said work and SFMTA may authorize the temporary relocation of the affected bus stop.[67]

With adherence to the blue book, including development and implementation of a traffic control plan and construction management plan, the temporary sidewalk and parking lane closures on Laurel and California streets, and parking lane closures on Masonic Avenue would not create hazards for people walking, biking, taking transit, or driving.

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[66] San Francisco Municipal Transportation Agency, City and County of San Francisco Regulations for Working in San Francisco Streets, 8th Edition, Chapter 5 and Appendix E, https://www.sfmta.com/sites/default/files/reports-and-documents/2017/10/blue_book_8th_edition_pdf.pdf, accessed June 12, 2018.

[67] San Francisco Municipal Transportation Agency, City and County of San Francisco Regulations for Working in San Francisco Streets, 8th Edition, Chapter 7.1, https://www.sfmta.com/sites/default/files/reports-and-documents/2017/10/blue_book_8th_edition_pdf.pdf, accessed June 12, 2018.

Construction Truck Traffic. As shown in Table 4.C.18 (p. 4.C.70), the number of construction-related truck trips would range from 10 to 80 per day for material removal and soil hauling during demolition and excavation for each Phase of the construction program. Following demolition and excavation, the project sponsor estimates that there would be approximately two material and vendor delivery trucks per day over each of the four Phases of the construction program, which would translate into approximately 1,300 deliveries for Phase 1, approximately 1,000 deliveries for Phase 2, approximately 1,500 deliveries for Phase 3, and approximately 850 deliveries for Phase 4. In addition, concrete truck trips would be as follows: approximately 2,500 truck trips for Phase 1, approximately 500 truck trips for Phase 2, approximately 3,500 truck trips for Phase 3, and approximately 400 truck trips for Phase 4.

It is anticipated that primary access to and from the project site for construction truck traffic would be provided from California Street and Presidio and Masonic avenues, with few construction-related vehicles entering the project site from Euclid Avenue and Laurel Street.[68] The impact of construction truck traffic on these streets could result in a slight lessening of their capacities because of slower-moving vehicles but would not substantially affect weekday a.m. and weekday p.m. peak period conditions because construction work would typically be scheduled to avoid peak commute periods. Access to Muni bus stops would be maintained during all phases of construction. However, the increase in truck traffic may interfere with Muni bus service in the area, particularly along California Street, which would provide primary access to the site. The addition of construction truck traffic may result in increased intersection and transit re-entry delay because of the larger size, turn radius, and slower acceleration of the heavy vehicles. Disruptions would be temporary and would occur at intersections adjacent to the project site where construction vehicles are concentrated.

Construction Worker Trips. As shown in Table 4.C.18 (p. 4.C.70), the number of construction workers accessing the site would range from 75 to 175 workers per day and up to 175 parking spaces would be required to accommodate construction worker vehicle trips. On-site parking would be provided for construction worker vehicles during Phase 1, Phase 2, Phase 3 and the beginning of Phase 4. Nearby parking spaces (100 vehicle parking spaces) would be required to meet anticipated construction worker parking demand during the end of Phase 4. There are several parking garages and lots within walking distance (within one half of a mile) of the project site that could be used for construction worker vehicle parking during this time period. Nearby parking garages include 3490 California Street, 3657 Sacramento Street, and 2355 Post Street.[69]

[68] Construction trucks would follow the routes identified in the Vehicles and Parking – Truck Routes section of the SF Transportation Information Map, http://www.sftransportationmap.org/, accessed June 12, 2018.

[69] The existing parking garages at 3490 California Street and 3657 Sacramento Street would not be available under 2040 cumulative conditions as a result of proposed new development projects.

Off-site shuttles may be provided to transport construction workers between the project site and the parking garage(s).

As described above, pursuant to San Francisco Public Works Code section 2.4.20, Action on Applications for Permits to Excavate, the contractor would be required to submit a contractor parking plan to public works for permits for major work that has a duration of 30 days or longer.[70] The proposed project and project variant would be subject to this regulation. These requirements are intended to minimize the inconvenience to the neighborhood related to the availability of on-street parking within the project vicinity during project construction. The contractor parking plan would be reviewed and approved by public works.

The addition of the worker-related vehicle or transit trips would not substantially affect transportation conditions because the majority of employee construction trips occur prior to the morning and evening peak hours when traffic is heaviest and the construction contractor will be required to develop and implement a contractor parking plan. Additionally, impacts on local intersections or the transit network would be substantially less than those associated with the proposed project or project variant and temporary in nature.

The proposed project or project variant would be built out over a period of between 7 and 15 years in four phases with worker parking, staging, concrete pours, and other activities occurring onsite depending on the construction phase. Each construction phase would have a duration of less than three years and most construction vehicle staging and activity would be contained on the project site. Construction activities would be limited to select onsite locations based on the phasing program as shown on Figure 2.30, p. 2.90. Thus, construction truck traffic, worker parking, and other activities not accommodated on site would affect different roadways and access points over the four phases and 7- to 15-year construction program. Those construction activities as well as any activities that would occur offsite, such as temporary parking, sidewalk closures, and utility installation, are required to be conducted in accordance with the public works code, public works department orders, and the blue book, as applicable, in order to minimize the potential for hazardous conditions and to ensure safe travel in and around the site. The proposed project and project variant construction activities would not constitute a permanent condition. Construction would be conducted in compliance with City requirements such that they would not result in substantial interference with pedestrian, bicycle, transit, or vehicle circulation or result in hazardous conditions for pedestrians, bicycles, transit, or vehicles.

For reasons outlined above, construction-related activities for the proposed project or project variant would have a less-than-significant impact on transportation and no mitigation measures

[70] San Francisco Public Works Code Section 2.4.20, Action on Applications for Permits to Excavate, http://library.amlegal.com/nxt/gateway.dll/California/publicworks/publicworkscode?f=templates$fn=default.htm$3.0$vid=amlegal:sanfrancisco_ca$sync=1, accessed June 12, 2018.

would be required. However, Improvement Measure I-TR-1: Project Construction Updates is identified to further reduce less-than-significant construction impacts to nearby residents, institutions, and businesses.

Improvement Measure I-TR-1: Project Construction Updates

To minimize construction impacts on access for nearby residences, institutions, and businesses, the project sponsor should provide nearby residences and adjacent businesses with regularly updated information regarding construction, including construction activities, peak construction vehicle activities (e.g., concrete pours), travel or parking lane closures, and sidewalk closures via a newsletter and/or website.

OPERATIONAL IMPACTS

VMT Impacts

Impact TR-2: The proposed project or project variant would cause substantial additional VMT and/or substantially induce automobile travel. (*Less Than Significant with Mitigation*)

As shown in Table 4.C.10, existing average daily VMT per capita for residential uses is 7.3 for the TAZ in which the project site is located (TAZ 709). This is 58 percent below the existing regional average daily VMT per capita of 17.2 for residential uses. Existing average daily VMT per capita for office uses in TAZ 709 is 10.1, which is 47 percent below the existing regional average daily VMT per capita of 19.1 for office uses. Existing average daily VMT per employee for retail uses in TAZ 709 is 8.3, which is 44 percent less than the existing regional average daily VMT per employee of 14.8 for retail uses.

Influence of Parking on VMT

For the reasons set forth below, the amount of parking included in the proposed project or project variant would result in VMT that would be beyond the significance threshold for the non-residential use. Factors affecting travel behavior include the presence of parking, development density, the diversity of land uses, design of the transportation network, access to regional destinations, distance to high-quality transit, development scale, demographics, and transportation demand management. The transportation authority’s SF-CHAMP accounts for a variety of factors to estimate VMT throughout San Francisco, but SF-CHAMP is not sensitive to site-level characteristics such as project-specific TDM measures or the amount of parking provided on a site, which itself is considered a TDM measure.

As part of the Shift component of the Transportation Sustainability Program, the City adopted a TDM Program. The purpose of the TDM Program is to reduce VMT that is otherwise predicted to occur from new development (in SF-CHAMP or other transportation modeling software), based on the new development’s TAZ location. To achieve this VMT reduction, property owners must select from TDM measures (i.e., measures that reduce VMT by residents, tenants, employees, and visitors) that are under the control of the property owner. A reduction in VMT may result from shifting vehicle trips to sustainable travel modes or reducing the number of vehicle trips, increasing vehicle occupancy, or reducing the average vehicle trip length.

The TDM Technical Justification document[71] provides the technical basis for applicability, targets, and assignment of points to individual measures on the TDM menu used for the San Francisco TDM Program. The City assigned each of the TDM measures on the menu a number of points, reflecting its relative effectiveness in reducing VMT. The City grounded this relative effectiveness determination in literature review, local data collection, best practices research, and professional transportation expert opinion. One of the individual measures in the TDM menu that the City researched was parking supply, as described below.

In 2010, CAPCOA published a report that quantifies project-level land use, transportation, energy use, and other measures of effects on GHG emissions, based on a literature review of research conducted to date.[72] The CAPCOA report identifies a maximum 12.5 percent reduction in VMT related to parking supply (PDT-1). Recent research, described further below, indicates that an area with more parking influences higher demand for more automobile use.

A New York City study of three boroughs showed a clear relationship between guaranteed vehicular parking at home and a greater tendency to use the automobile for trips made to and from work, even when both work and home are well served by transit. The study also infers that driving to other non-work activities is also likely to be higher for households with guaranteed vehicular parking.[73] Related literature that focused on the relationship between the availability of free on-street parking and the number of cars per household supports the findings that the availability of parking increases private car ownership by approximately 9 percent.[74] A study of households within a 2-mile radius of 10 rail stations in New Jersey concluded that if development near transit stations is developed with a high parking supply (on- and off-street parking), then those developments will not reduce automobile use compared to developments located farther away from transit stations, and that parking supply can undermine the incentive to use transit.[75] A study of nine cities across the United States looked at the question of whether citywide changes in

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[71] City and County of San Francisco, *Transportation Demand Management Technical Justification*, January 2018 Update, http://default.sfplanning.org/plans-and-programs/emerging_issues/tsp/TDM_Technical_Justification_update2018.pdf, accessed April 12, 2018.

[72] California Air Pollution Control Officers Association, *Quantifying Greenhouse Gas Mitigation Measures: A Resource for Local Government to Assess Emission Reductions from Greenhouse Gas Mitigation Measures*, August 2010, http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf, accessed May 25, 2018.

[73] Weinberger, Rachel, Death by a Thousand Curb-cuts: Evidence on the Effect of Minimum Parking Requirements on the Choice to Drive, *Transport Policy 20*, March 2012, pp. 93-102.

[74] Zhan, Guo, Residential Street Parking and Car Ownership, *Journal of the American Planning Association* 79:1, 32-48, May 9, 2013.

[75] Chatman, Daniel, Does Transit-Oriented Development Need the Transit? *Access 47*, Fall 2015.

vehicular parking cause automobile use to increase or whether minimum parking requirements is an appropriate response to the already rising automobile use. The study concluded that "parking provision in cities is a likely cause of increased driving among residents and employees in those places."[76]

Research conducted in San Francisco focused on whether or not a relationship exists between the provision of off-street parking and the choice to drive among individuals traveling to or from the site (similar to the focus of one of the questions in the nine-city United States study). Following data collection and an empirical review of the data, this research found that reductions in off-street vehicular parking for office, residential, and retail developments reduce the overall automobile mode share associated with those developments, relative to projects with the same land uses in similar contexts that provide more off-street vehicular parking.[77] In other words, more off-street vehicular parking is linked to more driving, indicating that people without dedicated parking spaces are less likely to drive.

Based on the recent research, a reduced parking supply is one the most effective TDM measures available in the menu for the TDM Program. Eleven options (with points associated with them) are provided for this TDM measure in the TDM Program, depending on the development project's parking supply[78] compared to the neighborhood parking rate. The neighborhood parking rate is the number of existing parking spaces provided per dwelling unit or per 1,000 square feet of non-residential uses for each TAZ within San Francisco.[79]

Using the neighborhood parking rate as a basis for assigning points accounts for the variability in geography throughout San Francisco and the effect this can have on travel behavior. Although parking supply is not an input into SF-CHAMP, based on the recent research, the existing parking supply within a TAZ has a relationship with VMT for that TAZ. Even though parking is not specifically an input in SF-CHAMP, the amount of existing parking is captured in the estimates of VMT outputs from SF-CHAMP because it is an existing condition on the ground. Therefore, it is likely that a new development that does not propose parking at or below the neighborhood parking rate would not reduce VMT below the existing VMT per capita rate for that TAZ.

The analysis below compares the proposed project and project variant residential uses to the neighborhood parking rate, which accounts for residential units in TAZ 709 and other nearby TAZs (within three-quarters of a mile based on walking distance) with more distant land use and

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[76] McCahill, Chris, et al., *Effects of Parking Provision on Automobile Use in Cities: Inferring Causality.* Transportation Research Board 2016 Annual Meeting, November 13, 2015.
[77] Fehr and Peers, *Parking Analysis and Methodology Memo – Final*, April 27, 2015.
[78] This refers to accessory (or off-street) parking supply, which is defined in the TDM Program Standards.
[79] City and County of San Francisco, *Transportation Demand Management Technical Justification*, January 2018 Update, p. 33 and Appendix B, http://default.sfplanning.org/plans-and-programs/emerging_issues/tsp/TDM_Technical_Justification_update2018.pdf, accessed May 18, 2018.

parking given decreasing weight. The analysis splits non-residential into retail and other non-residential (office and daycare) uses and compares those to the neighborhood parking rate, which accounts for parking associated with retail and other non-residential uses along California Street and Sacramento Street near the project site.[80] This information is presented in Table 4.C.19: Parking Rate Summary and discussed below.

Table 4.C.19: Parking Rate Summary

Scenario/Land Use	Size	Vehicle Parking Spaces	Existing Neighborhood Parking Rate	Proposed Parking Rate	Change from Existing
Proposed Project					
Residential	558 units	558	0.9	1	11%
Retail	54,117 gsf	198	1.55	3.66	136%
Other Non-residential (Office & Daycare)	64,689 gsf	129	1.44	1.99	38%
Project Variant					
Residential	744 units	744	0.9	1	11%
Retail	48,593 gsf	188	1.55	3.87	150%
Other Non-residential (Daycare)	14,650 gsf	29	1.44	1.98	37%

Note: The existing parking rate for residential uses reflects data for TAZ 709 and other nearby TAZs (within three-quarters of a mile based on walking distance). The existing parking rate for retail and other non-residential uses reflects data from California and Sacramento streets, as provided by the planning department. The retail land use category for the proposed project and project variant includes the proposed 60 public parking (commercial) spaces on the project site. Car-share spaces are not included in the parking rate calculation as these would be publicly accessible spaces and would not be dedicated to residents or tenants of the proposed project or project variant.

Source: Kittelson and Associates, Inc. 2018; San Francisco Planning Department, 2018

RESIDENTIAL PARKING RATE

The existing neighborhood parking rate for the project site (TAZ 709) and surrounding area is approximately 0.90 spaces per residential unit.[81,82] The parking rate takes into account the number of parking spaces and residential units for multi-unit buildings in the TAZ itself and other nearby

80 Planning department staff reviewed assessor and planning department records and street view/aerial photos to estimate off-street parking associated with retail uses along California and Sacramento streets near the project site to derive the appropriate neighborhood parking rate for this analysis.

81 City and County of San Francisco, *Transportation Demand Management Technical Justification*, January 2018 Update, Appendix B, http://default.sfplanning.org/plans-and-programs/emerging_issues/tsp/TDM_Technical_Justification_update2018.pdf, accessed May 11, 2018.

82 The TDM Program assigns points for PKG-4 Parking Supply based upon the multi-unit residential neighborhood parking rate because the residential projects subject to the TDM Program are multi-unit buildings. For TAZ 709, that multi-unit residential neighborhood parking rate is approximately 0.90. For CEQA, the residential neighborhood parking rate accounts for both the single-family and multi-family buildings. Single-family residential buildings tend to have more parking spaces per unit, and TAZ 709 and the surrounding area contain numerous single-family residential buildings. Thus, the CEQA analysis reports a higher residential parking number for TAZ 709 than that used in the TDM Program for assignment of PKG-4 Parking supply points.

TAZs (within three-quarters of a mile, based on walking distance), with more distant parking spaces and residential units given decreasing weight.

The existing average daily VMT per capita for residential use in TAZ 709 is approximately 58 percent below the existing regional average daily VMT per capita for residential use. Therefore, in order to exceed the threshold of 15 percent below the regional average for residential use, the project would have to substantially increase VMT per capita for residential use.

In order to account for an increase or decrease in VMT per capita, the analysis compares the parking rate of the proposed project and project variant to the neighborhood parking rate for residential use. The proposed project would provide 558 parking spaces for the residential use or 1 space per unit. The project variant would provide 744 parking spaces for the residential use or 1 space per unit.[83]

The proposed project and project variant parking rates are 11 percent higher than the neighborhood average,[84] meaning that the proposed project and project variant residential uses would be expected to generate higher VMT rates than the forecasts from SF-CHAMP (which are designed to estimate the "average" project) would suggest. However, there are features of the proposed project and project variant that would influence travel behavior and VMT. The VMT estimates do not fully account for the reduction in VMT that would likely occur due to the proposed project's TDM Plan, which includes measures to reduce VMT. The TDM Technical Justification includes documentation regarding the estimated VMT reduction from many of the measures included in the proposed TDM Plan. For example, improving walking conditions (Active-1) could reduce VMT by up to 2 percent. Unbundled parking (Pkg-1) could reduce VMT by up to 4.5 percent.[85]

Given the average daily VMT per capita for residential use for the project site is 58 percent below the existing regional average daily VMT for residential use, the likely increase in VMT per capita associated with provision of residential parking spaces would not increase VMT per capita enough to exceed the threshold of 15 percent below the regional average for residential use; moreover, the VMT estimates do not account for the TDM measures that may offset some of the VMT increases from the proposed project and project variant's parking rate. Accordingly, the

[83] The car share spaces are not included in the parking rate calculation as these would be publicly accessible spaces and would not be dedicated to residents or tenants of the proposed project or project variant.

[84] Although the project variant includes more absolute parking than the proposed project, the parking rate for both the project variant and the proposed project are the same. Thus, both have the same percentage of parking rates above the neighborhood parking rate.

[85] City and County of San Francisco, *Transportation Demand Management Technical Justification*, January 2018 Update, pp. 25 and 31, http://default.sfplanning.org/plans-and-programs/emerging_issues/tsp/TDM_Technical_Justification_update2018.pdf, accessed May 11, 2018.

VMT impacts of the proposed project and project variant's residential uses would be less than significant.

OTHER NON-RESIDENTIAL PARKING RATES

Other Non-residential (Office and Daycare)

The existing neighborhood parking rate for other non-residential (office and daycare) uses is approximately 1.44 spaces per 1,000 square feet. The existing average daily VMT per office employee in TAZ 709 is approximately 47 percent below the existing regional average daily VMT per office employee. Therefore, in order to exceed the threshold of 15 percent below the regional average for these uses, the project would have to substantially increase VMT per office employee.

In order to account for an increase or decrease in VMT per employee, the analysis compares the parking rate of the proposed project and project variant to the existing neighborhood parking rate. As shown in Table 4.C.19, p. 4.C.77, the proposed project would provide 129 parking spaces for the other non-residential (office and daycare) uses, or 1.99 spaces per 1,000 square feet. The project variant would provide 29 parking spaces for the other non-residential (daycare) uses, or 1.98 spaces per 1,000 square feet.

The proposed project and project variant parking rates for other non-residential uses (office and daycare) are 38 percent and 37 percent higher than the existing neighborhood parking rate, respectively, meaning that the proposed project's and project variant's other non-residential (office and daycare) uses would be expected to generate higher VMT rates than the forecasts from SF-CHAMP (which are designed to estimate the "average" project) would suggest. Given the average daily VMT per office employee for the TAZ is 47 percent below the existing regional average daily VMT, the likely increase in VMT per employee associated with provision of other non-residential (office and daycare) parking spaces would not increase VMT per employee enough to exceed the threshold of 15 percent below the regional average for these uses; moreover, the VMT estimates do not account for the TDM measures that may offset some of the VMT increases from the proposed project and project variant's parking rate. Accordingly, the VMT impacts of the proposed project's and project variant's other non-residential (office and daycare) uses would be less than significant.

Retail

The existing neighborhood parking rate for retail uses is approximately 1.55 spaces per 1,000 square feet. The existing average daily VMT per retail employee in TAZ 709 is approximately 44 percent below the existing regional average daily VMT per retail employee. Therefore, in order to exceed the threshold of 15 percent below the regional average for retail uses, the project would have to substantially increase VMT per retail employee.

In order to account for an increase or decrease in VMT per employee, the analysis compares the parking rate of the proposed project and project variant to the existing neighborhood parking rate for retail uses. As shown in Table 4.C.19, p. 4.C.77, the proposed project would provide 198 parking spaces for the retail uses, or 3.66 spaces per 1,000 square feet.[86] The project variant would provide 188 parking spaces for the retail uses, or 3.87 spaces per 1,000 square feet.[87]

The proposed project's and project variant's parking rates are 136 percent and 150 percent higher than the existing neighborhood parking rate for retail uses, respectively, meaning that the proposed project's and project variant's retail uses would be expected to generate higher VMT rates than the forecasts from SF-CHAMP (which are designed to estimate the "average" project) would suggest. Given the average daily VMT per retail employee for the TAZ is 44 percent below the existing regional average daily VMT, the likely increase in VMT per employee associated with provision of retail parking spaces may increase VMT per employee enough to exceed the threshold of 15 percent below the regional average for retail uses. Implementation of Mitigation Measure M-TR-2: Reduce Retail Parking Supply would lessen the impact of the proposed project's or project variant's parking supply for retail uses to less-than-significant levels.

Mitigation Measure M-TR-2: Reduce Retail Parking Supply

The proposed project or project variant shall provide retail parking in an amount not to exceed the existing neighborhood rate of 1.55 spaces per 1,000 gross square feet by 38 percent (or 2.14 spaces per 1,000 gross square feet).

Implementation of Mitigation Measure M-TR-2 would reduce the amount of off-street parking provided by the proposed project or project variant. Therefore, the VMT impacts of the proposed project or project variant would be considered to be less than significant with implementation of this mitigation measure.

Impact of Project on Induced Travel and VMT

The proposed project and project variant are not transportation projects. However, the proposed project and project variant would include features that would alter the transportation network. These features include sidewalks, bicycle facilities, on-street loading zones, new curb cuts, the new Walnut Street extension, internal walkways, on-street safety strategies, and intersection traffic control, as described in Chapter 2, Project Description, on pp. 2.78-2.82. These features fit within the general types of projects that would not substantially induce automobile travel.

[86] This rate includes the 60 commercial/public parking spaces that would be made available for the general public, as visitors of non-residential uses at the project site or surrounding area would most likely use those spaces.

[87] Ibid.

Therefore, the VMT impact related to the proposed streetscape modifications or other project features would be less than significant.

Traffic Hazard Impacts

Impact TR-3: The proposed project or project variant would not cause major traffic hazards. (*Less than Significant*)

Project Driveways

An evaluation of traffic operations was conducted to assess potential hazards related to vehicle access and circulation and queueing at the project site driveways.[88] Based on a review of existing conditions, the addition of project-generated traffic could result in queues and potential conflicts with existing traffic operations in the vicinity of the proposed Laurel Street driveway between California Street and Mayfair Drive (see Figure 2.22, p. 2.61) with potential conflicts would be between vehicles entering/exiting the Laurel Village Shopping Center surface parking lot and vehicles accessing the proposed project's or project variant's below-grade parking garage from the Laurel Street northernmost driveway. Because of the layout of the Laurel Village Shopping Center surface parking lot, which has a single-lane one-way drive aisle, there is not sufficient room for drivers to bypass queued vehicles waiting to park. During times of peak demand, queues can spill back across the sidewalk and onto Laurel Street and affect operations of the adjacent, closely spaced intersections at California Street and at Mayfair Drive. To minimize the potential for traffic hazards, the Laurel Street northernmost driveway into the proposed project's or project variant's below-grade parking garage would operate as a right-in/right-out driveway. Left turn movements would be prohibited at all times. Left-turn maneuvers would be restricted by a channelizing island in the driveway throat.[89] Regulatory signs and pavement markings would be used to supplement channelization of the driveway. Right-turn arrow pavement markings and signage would be placed in the garage at the driveway approach to inform exiting drivers of the proper or desirable path for vehicles. Consistent with design specifications in the *Manual on Uniform Traffic Control Devices*, vehicles exiting the driveway would face a Stop (R1-1) sign followed by No Left Turn (R3-2) sign and vehicles entering the driveway would be provided a Keep Right (R4-7) sign at the beginning of the driveway.[90] The right-in/right-out channelization would reduce the frequency and severity of conflicts by reducing the number of conflict points –

[88] The driveway operations analysis and queue evaluation reports are included in EIR Appendix D.

[89] An island is a defined area between traffic lanes for control of vehicle movements. Islands vary widely in characteristics and design features. It may be an area delineated by a curb or a pavement area marked by paint. Painted (thermoplastic) or flush treatments are usually not appropriate for right-in right-out channelizations unless accompanied by devices that prohibit vehicles from driving through the area, such as batons, jiggle bars, or delineators. Raised traffic islands are typically used for right-in/right-out channelization.

[90] California Department of Transportation, 2014 California Manual of Uniform Traffic Control Devices Rev 3, March 2018, http://www.dot.ca.gov/trafficops/camutcd/, accessed June 12, 2018.

or points where the paths of two through or turning vehicles diverge, merge, or cross – at the driveway. This design also would eliminate the crossing conflicts that accompany left turn ingress and egress maneuvers.

With the left turn movement prohibition, vehicles accessing the parking garage would circulate around the project site and approach the driveway from northbound Laurel Street. Exiting vehicles would make a right turn onto northbound Laurel Street and continue through the California Street/Laurel Street intersection to their destination. Right-in/right-out operations of this driveway would minimize the potential for queues to form on Laurel Street and resolve potential hazards between vehicles entering/exiting the project driveway and vehicles accessing the Laurel Village Shopping Center surface parking lot across the street.

Although traffic hazard impacts would be less than significant, Improvement Measure I-TR-3: Driveway Queue Abatement is identified to further reduce the proposed project's or project variant's less-than-significant traffic hazard impacts.

Improvement Measure I-TR-3: Driveway Queue Abatement

It will be the responsibility of the owner/operator of the proposed parking garage to ensure that recurring vehicle queues do not occur on the public right-of-way. A vehicle queue is defined as one or more vehicles (destined to the parking facility) blocking any portion of any public street, alley or sidewalk for a consecutive period of three minutes or longer on a daily or weekly basis.

If a recurring queue occurs, the owner/operator of the parking facility will employ abatement methods as needed to abate the queue. Appropriate abatement methods will vary depending on the characteristics and causes of the recurring queue, as well as the characteristics of the parking facility, the street(s) to which the facility connects, and the associated land uses.

Suggested abatement methods include but are not limited to the following: redesign of facility to improve vehicle circulation and/or on-site queue capacity; ingress/egress restrictions, such as limiting access to right-in/right-out; employment of parking attendants; installation of "LOT FULL" signs with active management by parking attendants; use of valet parking or other space-efficient parking techniques; use of parking occupancy sensors and signage directing drivers to available spaces; transportation demand management strategies such as customer/employee shuttles, delivery services; and/or parking demand management strategies such as parking time limits, paid parking, time-of-day parking surcharge, or validated parking.

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

Implementation of Improvement Measure I-TR-3 would help ensure that recurring vehicle queues do not occur at the project driveways or on the public right-of-way. Therefore, the less-than-significant impacts related to traffic hazards would be further reduced.

Streetscape Changes

An evaluation of traffic operations was conducted to assess potential impacts and traffic hazards related to the proposed streetscape changes. The project proposes streetscape changes as part of a series of proposed modifications along Presidio Avenue, Masonic Avenue, Euclid Avenue, and Mayfair Drive, as illustrated in Figure 2.22, Figure 2.28a: Existing Streetscape and Proposed Streetscape Changes - Presidio Avenue, and Figure 2.28b: Existing Streetscape and Proposed Streetscape Changes - Masonic Avenue on pp. 2.61, 2.79 and 2.80.

The addition of the corner bulb-out and eastside crosswalk at Mayfair Drive/Laurel Street would increase pedestrian visibility and improve sight distance for drivers. The proposed changes would not introduce new lane configurations or traffic controls and would result in minimal changes to operations. The intersection operations analysis focuses on impacts resulting from removal of the channelized right turn lanes at Presidio Avenue/Masonic Avenue/Pine Street and Masonic Avenue/Euclid Avenue. A summary and results of the operations analysis are included in EIR Appendix D. Based on the analysis, the proposed streetscape changes would not substantially alter traffic operations, i.e., increase queue lengths or cause speed differentials, such that there would be increased risk of rear-end crashes or other hazards. Thus, the proposed streetscape changes would have a less-than-significant impact related to traffic hazards.

Transit Impacts

Impact TR-4: The proposed project or project variant would result in an adverse transit capacity utilization impact for Muni route 43 Masonic during the weekday a.m. peak hour under baseline conditions. (*Significant and Unavoidable with Mitigation*)

The assessment of transit conditions considers whether the proposed project or project variant would cause a substantial increase in transit demand that would not be considered to be fully accommodated by available transit capacity. The transit analysis evaluates ridership and capacity utilization for the project variant as this land use alternative would generate more transit riders and would therefore be more conservative for purposes of the analysis. Transit-related impacts resulting from the proposed project would be similar or less than those identified for the project variant. As described below, the proposed project or project variant would result in an adverse impact on the 43 Masonic Muni route by increasing ridership to exceed the 85 percent capacity utilization and contributing more than 5 percent on this route during the weekday a.m. peak hour under baseline conditions.

The proposed project or project variant would generate a substantial number of transit riders during the weekday a.m. peak hour and p.m. peak hours. As shown in Table 4.C.14, p. 4.C.58, the proposed project would generate 295 person-trips on transit during the weekday a.m. peak hour and 330 person-trips on transit during the weekday p.m. peak hour. The project variant would generate 324 person-trips on transit during the weekday a.m. peak hour and 392 person-trips on transit during the weekday p.m. peak hour. Of these transit trips, approximately 96 trips would cross the local screenlines during the weekday a.m. peak hour and 107 trips would cross the local screenlines during the weekday p.m. peak hour. Transit trips to and from the project site would use nearby Muni routes (1 California, 1BX California 'B' Express, 2 Clement, 3 Jackson, 31BX Balboa 'B' Express, 33 Ashbury-18th, 38 Geary, 38BX Geary 'B' Express, and 43 Masonic) to connect to and from local destinations and regional transit providers.

The project-generated transit trips would follow the geographic trip distribution patterns described earlier throughout San Francisco and the region (see Table 4.C.13, p. 4.C.55). Transit trips generated by the project variant were assigned to the individual transit routes based on the likely origins and destinations of the trips and the headways and available capacity on each route. Table 4.C.20: Muni Downtown Screenlines and Individual Routes – Baseline and Baseline Plus Project Variant Conditions presents ridership and capacity utilization data for Muni screenlines and sub-corridors with project-generated transit trips added to the baseline ridership for the project variant during the weekday a.m. and p.m. peak hours.

As shown in the Table 4.C.20, the Southwest Screenline exceeds Muni's capacity utilization standard of 85 percent during the weekday a.m. peak hour under baseline conditions. The addition of riders from the proposed project or project variant would increase capacity utilization but would not cause any screenlines that do not operate above 85 percent capacity utilization under baseline conditions to exceed 85 percent utilization, nor add more than 5 percent to the baseline ridership on a screenline that would exceed 85 percent utilization under baseline conditions. Therefore, the proposed project or project variant would have a less-than-significant impact on Muni screenlines or sub-corridors.

As shown in Table 4.C.20, none of the individual Muni routes exceed Muni's capacity utilization standard of 85 percent under baseline conditions. With the addition of transit trips generated by the proposed project or project variant, the 43 Masonic would exceed Muni's capacity utilization standard of 85 percent during the weekday a.m. peak hour. The proposed project or project variant would add 13 riders or 15 riders to the line, but that increase would contribute less than 5 percent.[91] This increase in transit demand could not be accommodated by adjacent transit

[91] As shown in Table 4.C.14 (p. 4.C.57), the proposed project would generate 9 percent fewer transit person-trips than the project variant and would have a similar transit trip distribution. As such, the proposed project would add 9 percent fewer riders to the 43 Masonic route than the project variant.

Table 4.C.20: Muni Downtown Screenlines and Individual Routes – Baseline and Baseline Plus Project Variant Conditions

Muni Screenline	Weekday A.M. Peak Hour						Weekday P.M. Peak Hour					
	Baseline			Baseline Plus Project Variant			Baseline			Baseline Plus Project Variant		
	Ridership	Capacity	Utilization	Project Trips	Ridership	Utilization	Ridership	Capacity	Utilization	Project Trips	Ridership	Utilization
Northeast												
Kearny/Stockton	2,273	3,157	72%	0	2,273	72%	2,444	3,327	73%	0	2,444	73%
Other lines	867	1,470	59%	0	867	59%	1,134	1,750	65%	0	1,134	65%
Screenline Total	*3,140*	*4,627*	*68%*	*0*	*3,140*	*68%*	*3,578*	*5,077*	*70%*	*0*	*3,578*	*70%*
Northwest												
Geary	2,302	3,763	61%	28	2,330	62%	2,913	3,621	80%	35	2,948	81%
California	1,436	2,010	71%	40	1,476	73%	1,349	1,752	77%	45	1,394	80%
Sutter/Clement	514	630	82%	28	542	86%	523	630	83%	27	550	87%
Fulton/Hayes	1,505	2,237	67%	0	1,505	67%	1,544	1,838	84%	0	1,544	84%
Balboa	553	1008	55%	0	553	55%	537	974	55%	0	537	55%
Screenline Total	*6,310*	*9,648*	*65%*	*96*	*6,406*	*66%*	*6,866*	*8,815*	*78%*	*107*	*6,973*	*79%*
Southeast												
Third Street	1,025	3,808	27%	0	1,025	27%	1,836	3,808	48%	0	1,836	48%
Mission	2,155	2,632	82%	0	2,155	82%	1,927	2,632	73%	0	1,927	73%
San Bruno/Bayshore	1,867	2,197	85%	0	1,867	85%	1,035	2,134	49%	0	1,035	49%
Other lines	1,577	1,712	**92%**	0	1,577	**92%**	1,213	1,612	75%	0	1,213	75%
Screenline Total	*6,624*	*10,349*	*64%*	*0*	*6,624*	*64%*	*6,011*	*10,186*	*59%*	*0*	*6,011*	*59%*
Southwest												
Subway lines	6,783	7,020	**97%**	0	6,783	**97%**	5,433	6,804	80%	0	5,433	80%
Haight/Noriega	1,178	1,596	74%	0	1,178	74%	1,065	1,596	67%	0	1,065	67%
Other lines	474	560	85%	0	474	85%	655	841	78%	0	655	78%
Screenline Total	*8,435*	*9,176*	***92%***	*0*	*8,435*	***92%***	*7,153*	*9,241*	*77%*	*0*	*7,153*	*77%*
Muni Screenlines Total	*24,509*	*33,800*	*73%*	*96*	*24,605*	*73%*	*23,608*	*33,319*	*71%*	*107*	*23,715*	*71%*

Muni Screenline	Weekday A.M. Peak Hour						Weekday P.M. Peak Hour					
	Baseline			Baseline Plus Project Variant			Baseline			Baseline Plus Project Variant		
	Ridership	Capacity	Utilization	Project Trips	Ridership	Utilization	Ridership	Capacity	Utilization	Project Trips	Ridership	Utilization
Individual Routes												
43 Masonic (IB)	318	378	84%	15	333	**88%**	140	315	44%	32	172	55%
43 Masonic (OB)	246	378	65%	37	283	75%	215	315	68%	14	229	73%
1 California (IB)	735	945	78%	12	747	79%	290	630	46%	46	336	53%
1 California (OB)	583	1,080	54%	61	644	60%	857	1,080	79%	13	870	81%
1BX California 'B' (IB)	555	705	79%	13	568	81%	-	-	-	-	-	-
1BX California 'B'(OB)	-	-	-	-	-	-	245	344	71%	12	257	75%
2 Clement (IB)	240	315	76%	17	257	82%	140	315	44%	27	167	53%
2 Clement (OB)	125	315	40%	20	145	46%	240	315	76%	17	257	82%
3 Jackson (IB)	240	315	76%	11	251	80%	135	315	43%	19	154	49%
3 Jackson (OB)	105	315	33%	13	118	37%	185	315	59%	10	195	62%
33 Ashbury-18th (IB)	116	252	46%	10	126	50%	136	252	54%	18	154	61%
33 Ashbury-18th (OB)	116	252	46%	14	130	51%	108	252	43%	13	121	48%
31BX Balboa 'B' (IB)	280	360	78%	15	295	82%	-	-	-	-	-	-
31BX Balboa 'B' (OB)	-	-	-	-	-	-	164	344	48%	20	184	53%
38 Geary (IB)	480	806	60%	24	504	63%	489	806	61%	71	560	69%
38 Geary (OB)	429	806	53%	48	477	59%	640	940	68%	10	650	69%
38R Geary Rapid (IB)	862	1,025	84%	4	866	84%	-	-	-	-	-	-
38R Geary Rapid (OB)	-	-	-	-	-	-	927	1,025	90%	10	937	91%
38BX Geary 'B' (IB)	245	315	78%	4	249	79%	-	-	-	-	-	-
38BX Geary 'B' (OB)	-	-	-	-	-	-	209	329	64%	15	224	68%

Note: **Bold** indicates capacity utilization of 85 percent or greater. Muni operations direction: IB = Inbound toward downtown, OB = Outbound away from downtown. Screenlines analyzed as inbound and outbound Muni operations direction for the weekday a.m. and p.m. peak hours, respectively.

Source: San Francisco Planning Department, *Transit Data for Transportation Impact Studies*, May 2015. See EIR Appendix D for Transit Line Capacity Calculations

capacity, given the 43 Masonic is the only transit line within one half of a mile that serves the northbound destinations for the assumed distribution of project trips. Therefore, the proposed project or project variant would have a significant impact on an individual Muni line.

Mitigation Measure M-TR-4: Monitor and Provide Fair-Share Contribution to Improve 43 Masonic Capacity, has been identified as a mechanism to monitor project-related impacts on the 43 Masonic route and to develop transit route improvements that would reduce impacts, as feasible, to the 43 Masonic transit headways.

Mitigation Measure M-TR-4: Monitor and Provide Fair-Share Contribution to Improve 43 Masonic Capacity

Based on an evaluation of the transit ridership generated by the proposed project or project variant, monitoring of transit capacity utilization for the 43 Masonic route shall be initiated when the first phase of development has been completed and occupied.

The transit monitoring phase shall involve the following steps.

- The project sponsor shall fund a transit capacity study to be reviewed and approved by the SFMTA. The project sponsor shall obtain current ridership on the 43 Masonic route from SFMTA and an assessment of the capacity utilization shall be conducted at the 43 Masonic route's maximum load point for weekday a.m. peak hour conditions.
- If the capacity utilization exceeds 85 percent, a fair share contribution payment shall be made to SFMTA by the project sponsor, calculated in a Transit Mitigation Agreement, to contribute to the cost of providing additional bus service or otherwise improving service on the 43 Masonic route.

The fair share contribution as documented in EIR Appendix D shall not exceed the following amounts across all phases. Payment of the following fair share contribution levels would mitigate the impacts of the estimated transit ridership added by full development of the proposed project or project variant.

- Proposed Project – $182,227
- Project Variant – $218,390

SFMTA will determine whether adding bus(es) or other measures are more desirable to increase capacity along the route and will use the funds provided by the project sponsor to implement the most desirable measure, which may include, but is not limited to, the following:

1. Instead of adding more buses to a congested route, increase travel speeds along the route, which would allow for buses to move faster, thus increasing efficiency and reliability. In this case, the project sponsor's fair share contribution may be used to fund a study to identify appropriate and feasible improvements and/or implement a portion of the improvements that would increase travel speeds enough to increase capacity along the bus route. Such improvements could include transit only lanes, transit signal priority, and transit boarding improvements.

2. Increase capacity along the corridor by adding a new Muni service route in this area. If this option is selected, the project sponsor's fair share contribution may fund the purchase of the new vehicles.

If the capacity utilization with the proposed project or project variant based on SFMTA's ridership data is less than 85 percent after a particular phase of the proposed project or project variant is completed and occupied, then the project sponsor's fair share payment shall be $0 and the process shall repeat at the subsequent phase. Each subsequent fair share calculation shall take account of amounts paid for prior phases, to ensure that payments are not duplicative for the same transit rider impacts.

Implementing transit route improvements as identified in Mitigation Measure M-TR-4 is expected to allow Muni to maintain transit headways, and would reduce the proposed project's or project variant's impact on the 43 Masonic to a less-than-significant level. However, because the options for providing additional service and SFMTA's ability to implement improvements is uncertain, the proposed project's or project variant's impact would be considered to be significant and unavoidable with mitigation.

Impact TR-5: The proposed project or project variant would not result in an adverse impact related to a substantial increase in transit delays. (*Less than Significant*)

The assessment addresses whether added project traffic could affect transit routes such as the 1 California, 2 Clement, and 3 Jackson on California Street and the 43 Masonic on Presidio Avenue by causing transit delays due to intersection congestion or due to queues of vehicle traffic at intersections and/or at entrances to the proposed garages. Due to the expected increase in vehicle traffic along California Street, localized impacts were evaluated at California Street/Presidio Avenue, California Street/Walnut Street, and California Street/Laurel Street. The analysis is summarized in the Travel Demand Memorandum (see EIR Appendix D). Based on the findings of the analysis, the project-related increase in traffic volumes would result in less than a two-second increase in intersection average delay and an increase of less than five seconds on any approach. Therefore, the proposed project and project variant would not result in substantial transit delays and the proposed project or project variant would result in a less-than-significant transit impact related to transit delay.

Impact TR-6: The proposed project or project variant would not cause significant impacts on regional transit. (*Less than Significant*)

The transit impact analysis for regional transit providers addresses potential impacts on transit capacity for regional transit service. The assessment addresses whether project-generated ridership could cause transit ridership on regional operators and screenlines to exceed capacity utilization thresholds identified on p. 4.C.18. Table 4.C.21: Regional Transit Screenlines – Baseline and Baseline Plus Project Variant Conditions – Weekday A.M. Peak Hour (Inbound)

Table 4.C.21: Regional Transit Screenlines – Baseline and Baseline Plus Project Variant Conditions – Weekday A.M. Peak Hour (Inbound)

Regional Screenline	Baseline Conditions			Baseline Plus Project Variant Conditions		
	Ridership	Capacity	Utilization	Project Trips	Ridership	Utilization
East Bay						
BART	28,000	25,680	**109%**	15	28,015	**109%**
AC Transit	1,596	2,829	56%	1	1,597	56%
Ferries	818	1,170	70%	0	818	70%
Screenline Total	*30,414*	*29,679*	***102%***	*16*	*30,430*	***103%***
North Bay						
Golden Gate Transit Bus	1,344	2,543	53%	4	1,348	53%
Ferries	1,088	1,959	56%	4	1,092	56%
Screenline Total	*2,432*	*4,502*	*54%*	*8*	2,440	54%
South Bay						
BART	16,000	21,400	75%	8	16,008	75%
Caltrain	2,258	3,100	73%	1	2,259	73%
SamTrans	266	520	51%	0	266	51%
Ferries	-		-	--	--	--
Screenline Total	*18,524*	*25,020*	*74%*	*9*	18,533	74%
Regional Screenlines Total	*51,370*	*59,201*	*87%*	*33*	51,403	87%

Note: **Bold** indicates capacity utilization of 100 percent or greater. Screenlines analyzed as inbound and outbound Muni operations direction for the weekday a.m. and p.m. peak hours, respectively.

Source: San Francisco Planning Department, *Updated BART Regional Screenlines – Revised*, October 2016. See EIR Appendix D for Transit Line Capacity Calculations

and Table 4.C.22: Regional Transit Screenlines – Baseline and Baseline Plus Project Variant Conditions – Weekday P.M. Peak Hour (Outbound) present ridership and capacity utilization data for regional screenlines with transit trips generated by the project variant added to weekday a.m. and weekday p.m. peak hour baseline ridership, respectively. Transit ridership generated by the proposed project would be less than that generated by the project variant. As such, ridership and capacity utilization analysis is presented for the project variant, and impacts identified for the proposed project would be similar or less than those identified for the project variant.

Development under the project variant would generate 46 regional transit trips during the weekday a.m. peak hour in the inbound direction (towards downtown): 16 transit person-trips from the East Bay, 8 transit person-trips from the North Bay, 9 transit person-trips from the South Bay, and 13 trips from out of the area in the inbound direction (towards downtown). In the outbound direction (away from downtown) during the weekday p.m. peak hour, the project variant would generate 56 transit trips: 20 transit person-trips to the East Bay, 10 transit person-trips to the North Bay, 11 transit person-trips to the South Bay, and 15 trips out of the area.

Development under the proposed project would generate fewer than 46 regional transit trips inbound (towards downtown) during the weekday a.m. peak hour and fewer than 56 regional transit trips outbound (away from downtown) during the weekday p.m. peak hour.

The East Bay regional transit screenline currently exceeds the 100 percent capacity utilization standards in the weekday a.m. peak hour under baseline conditions. The BART line to the East Bay currently exceeds the 100 percent capacity utilization threshold in the weekday a.m. and p.m. peak hours. The project variant would increase ridership on BART and at the East Bay regional transit screenline by less than 1 percent in the weekday a.m. and p.m. peak hour. Furthermore, the closest regional transit providers to the project site are Golden Gate Transit buses traveling along Geary Boulevard (to the south) and along Park Presidio Avenue (to the west). Given the distance from the site, the project-generated vehicle traffic would not result in substantial transit delays. Thus, the proposed project or project variant would result in a less-than-significant impact on regional transit service under baseline plus proposed project or project variant conditions.

Table 4.C.22: Regional Transit Screenlines – Baseline and Baseline Plus Project Variant Conditions – Weekday P.M. Peak Hour (Outbound)

Regional Screenline	Baseline Conditions			Baseline Plus Project Variant Conditions		
	Ridership	**Capacity**	**Utilization**	**Project Trips**	**Ridership**	**Utilization**
East Bay						
BART	27,000	25,680	**105%**	18	27,018	**105%**
AC Transit	2,297	3,926	59%	2	2,299	59%
Ferries	813	1,615	50%	1	814	50%
Screenline Total	*30,110*	*31,221*	*96%*	*20*	*30,130*	*97%*
North Bay						
Golden Gate Transit Bus	1,399	2,817	50%	6	1,405	50%
Ferries	973	1,959	50%	4	977	50%
Screenline Total	*2,372*	*4,776*	*50%*	*10*	2,382	50%
South Bay						
BART	15,000	21,400	70%	9	15,009	70%
Caltrain	2,472	3,100	80%	2	2,474	80%
SamTrans	147	320	46%	0	147	46%
Ferries	-	-	-	--	--	--
Screenline Total	*17,619*	*24,820*	*71%*	*11*	17,630	71%
Regional Screenlines Total	*50,101*	*60,817*	*82%*	*41*	50,142	82%

Note: **Bold** indicates capacity utilization of 100 percent or greater. Screenlines analyzed as inbound and outbound Muni operations direction for the weekday a.m. and p.m. peak hours, respectively.

Source: San Francisco Planning Department, *Updated BART Regional Screenlines – Revised*, October 2016. See EIR Appendix D for Transit Line Capacity Calculations

Pedestrian Impacts

Impact TR-7: The proposed project or project variant would not result in substantial overcrowding on public sidewalks, create potentially hazardous conditions for pedestrians, or otherwise interfere with pedestrian accessibility to the site and adjoining areas. (*Less than Significant*)

The analysis of pedestrian impacts considers whether the addition of project-generated pedestrians trips would have an impact on the pedestrian network proposed for the project site and whether the proposed project or project variant would create potentially hazardous conditions for pedestrians. The analysis also considers whether the proposed project or project variant would affect pedestrian accessibility.

Existing Conditions

As previously discussed in the “Pedestrian Facilities and Circulation” section (pp. 4.C.20-4.C.22), there are a number of existing challenges for pedestrians in the project area, such as channelized right turns (slip lanes) at California Street/Presidio Avenue, Presidio Avenue/Masonic Avenue/Pine Street, and Masonic Avenue/Euclid Avenue, and unmarked crossings on the north leg of Masonic Avenue/Presidio Avenue/Pine Street and the east leg of Laurel Street/Mayfair Drive. Particularly challenging conflict points between vehicles and pedestrians were observed at the intersection corners where channelized right-turn lanes are present (specifically, California Street/Presidio Avenue; Presidio Avenue/Masonic Avenue/Pine Street; and Masonic Avenue/Euclid Avenue). Vehicles approaching these right turn lanes were observed to travel at high speeds and did not yield to pedestrians. Additionally, the project site has limited Americans with Disabilities Act-accessible entry points due to the topography of the site.

Site Access and Accessibility

The proposed project and project variant would include numerous sidewalk network and intersection modifications that would enhance and define the pedestrian environment in the study area. Proposed streetscape modifications are illustrated in Figure 2.28a: Existing and Proposed Streetscape Changes – Presidio Avenue and Figure 2.28b: Existing and Proposed Streetscape Changes – Masonic Avenue in Chapter 2, Project Description pp. 2.81-2.82. The proposed designs for the streetscape modifications have been reviewed by SFMTA.

The proposed project would widen sidewalks, remove channelized right-turn lanes at Presidio Avenue/Masonic Avenue/Pine Street and Masonic Avenue/Euclid Avenue; construct corner bulb-outs at Laurel Street/Euclid Avenue, Laurel Street/Mayfair Drive, and Presidio Avenue/Masonic Avenue/Pine Street; and install marked crosswalks at the Laurel Street/Mayfair Drive and Presidio Avenue/Masonic Avenue/Pine Street intersections. These off-site streetscape modifications would improve pedestrian conditions by increasing visibility of people walking and improving sight lines at intersections, shortening crossing distances, slowing turning vehicles, and visually narrowing the roadway. These modifications would also increase the amount of space available for people walking and waiting for transit. In addition to these off-site improvements, the proposed project and project variant propose several new internal walkways that would enhance walkability, restrict non-emergency vehicle access, and prioritize safe pedestrian movement throughout the site. The proposed project and project variant would be designed to be compliant with the Americans with Disabilities Act, and pedestrian access would include elevators at selected entrances (for example, at the Plaza A Building near Cypress Stairs and at the Center Building B near the Pine Street Steps) and slope gradients that would enable people with disabilities to access the site at multiple locations. These features would improve conditions for people with disabilities relative to existing conditions. Overall, the proposed project's or project variant's site design would promote pedestrian accessibility into and through the site by connecting new pathways to the existing sidewalk network.

Pedestrian Activity

Pedestrian trips generated by the proposed project or project variant would include walking trips to and from the local transit stops primarily located along California Street and Presidio Avenue (1 California, 2 Clement, 3 Jackson, and 43 Masonic), as well as walking trips to and from nearby land uses, including stores and restaurants on site and the shops at Laurel Village Shopping Center. Walking trips between parked vehicles and buildings on the site are considered as auto person-trips and are not included in the pedestrian trips summarized in this section.

As presented in Table 4.C.14, p. 4.C.58, the proposed project would generate 671 pedestrian trips (376 walk trips and 295 transit trips) during the weekday a.m. peak hour and 728 pedestrian trips (398 walk trips and 330 transit trips) during the weekday p.m. peak hour. The project variant would generate 683 pedestrian trips (359 walk trips and 324 transit trips) during the weekday a.m. peak hour and 779 pedestrian trips (387 walk trips and 392 transit trips) during the weekday p.m. peak hour.

California Street and Presidio and Masonic avenues would be the primary routes for pedestrians traveling from off-site locations to and from the project site. Pedestrian travel generated by the proposed project or project variant could be accommodated on the internal pedestrian circulation network proposed for the project site, i.e. the Mayfair and Walnut walks and the external sidewalk network.

Project Driveways

The proposed parking garage driveways would be dispersed through the site with one vehicular access point (Walnut Street entrance) into the interior of the site along California Street leading to two parking garage driveways and the Walnut Street roundabout, three along Presidio and

Masonic avenues, and eight along Laurel Street between Euclid Avenue and California Street (see Figure 2.22, p. 2.61). Although these vehicular access points/driveways would be distributed along the perimeter of the project site and within the project site on the extension of Walnut Street, they could create conflicts with pedestrians, although not to levels that would create potentially hazardous conditions. Garage entrances would include pedestrian signage and audible warnings, which would reduce potential conflicts at these locations.

Conclusion

The pedestrian-related features of the proposed project and project variant would represent an improvement over existing conditions with respect to accessibility as both would include connections across the project site for pedestrians, which do not exist under baseline conditions. In addition, the proposed project or project variant would accommodate the pedestrian trips it would generate. Furthermore, while the proposed project and project variant would increase the number of vehicle trips in the study area and increase the number of vehicle entrance/exit points, the proposed project and project variant would also improve conditions in areas that currently exhibit challenges for pedestrians (e.g., channelized right turns). Therefore, the proposed project or project variant would have less-than-significant pedestrian impacts.

However, as noted above, although the parking facility access points would comply with appropriate design standards, implementation of Improvement Measure I-TR-3: Driveway Queue Abatement (see discussion under Impact TR-3, pp. 4.C.81-4.C.83) would further reduce the less-than-significant impacts related to vehicle queueing across sidewalks.

Impact TR-8: The proposed project and project variant would not create potentially hazardous conditions for bicyclists and would not interfere with bicycle accessibility to the project site or adjoining areas. (*Less than Significant*)

The proposed project and project variant would meet or exceed code requirements for the type, number, and location of bicycle parking spaces and showers and lockers. The proposed project and project variant would provide a variety of temporary and permanent bicycle storage options, including on-site class 2 bicycle spaces near pedestrian entrances to buildings and conveniently located secure class 1 spaces within the proposed garages. The proposed project and project variant would provide multimodal wayfinding signage directing people to the appropriate bicycle route or bicycle parking area. Lockers and showers and a bicycle repair station would also be provided to encourage bicycling.

The project site is located adjacent to designated citywide bicycle routes on Presidio and Euclid avenues and is located near several other streets that provide designated bicycle facilities. Bicyclists would be expected to travel along a combination of designated bicycle routes and other streets to access the site. It is likely that most bicyclists would enter the site at the proposed garage entrances, because these entrances would provide the most direct access to secure bicycle parking. The proposed project and project variant would include several design features that would have traffic calming effects and increase safety for bicyclists in the study area. In particular, the proposed sidewalk widening along Presidio Avenue would narrow the travel lanes and encourage slower vehicle speeds. Additionally, removal of the channelized right-turn lanes at Masonic Avenue/Euclid Avenue and Presidio Avenue/Masonic Avenue/Pine Street would have a traffic calming effect and reduce the speeds of right-turning vehicles at these locations. The proposed project or project variant would not remove or substantially alter existing bicycle facilities.

Queueing at the project driveways could result in temporary and minor disruptions to bicycle circulation along the surrounding streets, primarily concentrated during periods of high vehicular traffic activity into and out of the proposed garages. The increase in the number of access points and driveways could create conflicts with bicyclists on streets adjacent to the project site, particularly those traveling along California Street and Presidio Avenue where the entering/exiting vehicle volumes are higher. However, as noted above, the proposed driveways would be designed to comply with appropriate design standards, such as sight distance, and would include signage and audible warnings. These project design features would reduce potential for vehicles accessing the site to create hazardous conditions for bicyclists.

A review of common risk factors for bicycle-truck conflicts was conducted to evaluate the potential for project-generated heavy vehicle traffic to result in hazardous conditions for bicyclists. Common risk factors include right-turning truck versus through bicyclist, truck crossing the bicyclist path of travel to park on street, and visibility issues. Trucks accessing the proposed off-street loading docks in the California Street and Masonic garages would enter from the Presidio Avenue driveway and exit onto Masonic Avenue (California Street Garage) or enter/exit from Masonic Avenue (Masonic Garage). As illustrated in EIR Appendix D, trucks could turn into and out of the driveways without the need for multiple maneuvers and would not block the roadway or interfere substantially with bicycles. Furthermore, the proposed project's or project variant's proposed on-street commercial loading zone on California Street would not be adjacent to an on-street bicycle facility and bicycle volumes along California Street were observed to be low (less than five bicyclists during the weekday a.m. or p.m. peak periods).

As previously discussed in the "Bicycle Facilities and Circulation" section (pp. 4.C.22-4.C.25), observations and counts show a low level of bicycle activity on streets adjacent to the project site; however, bicycle activity would slightly increase due to the proposed project or project variant. Given the low volume of bicyclists who would be traveling on the surrounding streets, the design of the proposed driveways, and the location of the proposed on-street loading zones, the proposed project or project variant would not create potentially hazardous conditions for bicyclists. Therefore, the proposed project or project variant would have a less-than-significant impact on bicycle facilities and accessibility. Furthermore, with implementation of Improvement

Measure I-TR-3: Driveway Queue Abatement, the less-than-significant effect of vehicle queuing across sidewalks and onto streets would be minimized and bicycle travel on adjacent streets would be relatively unimpeded.

Freight Loading Impacts

Impact TR-9: The proposed project's or project variant's freight loading demand would be met during the peak loading hour. (*Less than Significant*)

The freight loading demand generated by the proposed project and project variant is presented in Table 4.C.16, p. 4.C.61. In the peak loading hour, the demand for loading spaces would be approximately six loading spaces for the proposed project and project variant. Commercial loading would occur within the six off-street loading spaces provided in two loading docks located within Basement Level B3 of the proposed California Street Garage (see Figure 2.25, p. 2.67) and Basement Level B1 of the Masonic Garage (see Figure 2.26, p. 2.69) or the proposed on-street 100-foot-long commercial loading space on California Street near the commercial retail space in the Plaza A and B buildings (see Figure 2.22, p. 2.61). The proposed supply of commercial loading spaces for both the proposed project and project variant would meet peak hour loading demand.

However, given the topography (i.e., an approximately 65-foot elevation change from southwest to northeast) and size of the site (10.25 acres), it is possible that delivery vehicles would concentrate near the uses they are attempting to serve, resulting in an uneven distribution of demand. For example, the majority of the retail uses would be located along California Street while there would not be as many active uses along Masonic Avenue. Therefore, delivery vehicles may choose to use the loading space on California Street instead of loading spaces in the proposed California Street and Masonic garages. The off-street loading dock in the proposed California Street Garage is approximately 400 feet away from the retail space in the proposed Walnut Building via a retail service elevator and corridor at Basement Level B3 along California Street. The proposed loading dock would be up to 700 feet away from the retail spaces in the proposed Plaza A and B buildings. The loading dock in the proposed Masonic Garage would be located further away from the retail spaces along California Street and would not have a dedicated service corridor. The retail space in the proposed Euclid Building could meet a portion of the demand from the off-street loading spaces and elevators within the proposed Masonic Garage.

The proposed supply of on-street and off-street loading spaces would meet the overall freight loading demand generated by the proposed project or project variant. A localized loading demand analysis was conducted to estimate the freight loading demand associated with the Plaza A and Plaza B buildings related to the proposed on-street loading zone on California Street, which would be more conveniently located to serve the retail use than the proposed off-street loading spaces. Based on these calculations, the Plaza A and Plaza B buildings would generate a peak hour demand of less than two trucks. Delivery vehicles would vary in size but based on information in the SF Guidelines, the majority (95 percent) would be two-axle trucks. The proposed 100-foot-long commercial loading space located along California Street (near the Plaza A and B buildings) would accommodate two two-axle trucks or one tractor-trailer. The estimated loading demand would therefore be met in terms of the overall number and location of proposed loading spaces.

Although loading impacts would be less than significant, Improvement Measures I-TR-9a: Schedule and Coordinate Deliveries and I-TR-9b: Monitor Loading Activity and Implement Loading Management Strategies are identified to further reduce the less-than-significant freight loading impacts.

Improvement Measure I-TR-9a: Schedule and Coordinate Deliveries

Per Planning Code section 169.5, the project will maintain a transportation demand management (TDM) coordinator.[92] The project's TDM coordinator will work with delivery providers and building tenants to schedule and coordinate loading activities to ensure that any freight loading/service vehicles can be accommodated either in the proposed on-street or on-site/off-street loading spaces. Loading and moving activities will be minimized during peak periods and spread across the day, thereby reducing activity during the peak hour for loading. The TDM coordinator will work with tenants to find opportunities to consolidate deliveries and reduce the need for peak period deliveries whenever possible. Deliveries will be scheduled to minimize loading activities during peak periods and reduce potential for conflicts with traffic, transit, bicyclists, and pedestrians on the surrounding street network. Freight loading/service vehicles will be monitored and actively discouraged from parking illegally or obstructing traffic, transit, bicycle, or pedestrian flow along the project frontages.

Improvement Measure I-TR-9b: Monitor Loading Activity and Implement Loading Management Strategies as Needed

After completion of the proposed project or project variant, the project sponsor will conduct a utilization study of commercial and passenger loading spaces. If the result of the study indicates that fewer than 15 percent of the loading spaces (e.g., 1 space) are available during the peak loading period, the project sponsor will implement loading management strategies and/or provide additional or expanded loading supply to meet the loading demand.

Additional loading strategies could include (but are not limited to):

- Expanding efforts to coordinate with parcel delivery companies to schedule deliveries during off-peak hours

[92] The project sponsor of a development project subject to the requirements of planning code section 169 must designate a TDM coordinator. The TDM coordinator may be an employee for the development project (e.g., property manager) or the project sponsor may contract with a third-party provider(s) (e.g., transportation brokerage services as required for certain projects pursuant to planning code section 163). The TDM coordinator shall be delegated authority to coordinate and implement the TDM Plan.

- Installing delivery supportive amenities such as lock boxes and unassisted delivery systems to allow delivery personnel access and enable off-peak hour deliveries
- Coordinating delivery services across buildings to enable the delivery of several buildings' packages to a single location
- Requiring deliveries to the retail and restaurant components of the proposed project or project variant to occur during early morning or late evening hours
- Reserving on-street parking spaces for smaller delivery vehicles through the SFMTA Temporary Signage Program

Implementation of Improvement Measure I-TR-9a would coordinate deliveries such that loading activity would be distributed across the site, and that peak-period demand would be reduced with deliveries to occur during off-peak hours. Implementation of Improvement Measure I-TR-9b would require ongoing monitoring, which would allow for adaptive management to ensure loading activities do not introduce hazards or substantial delays to transit.

Passenger Loading Impacts

Impact TR-10: The proposed project's or project variant's passenger loading demand would be met during the peak loading hour and would not create hazardous conditions or significant delays for transit, bicycles or pedestrians. (*Less than Significant*)

An evaluation of passenger loading demand and supply was conducted to assess potential impacts with on-street queues and traffic hazards at the proposed passenger loading zones. On-street passenger loading zones are proposed on the west side of Masonic Avenue near Presidio Avenue and Pine Street, on the north side of Euclid Avenue near Masonic Avenue, and on the east side of Laurel Street near Mayfair Drive (see Figure 2.22, p. 2.61) as part of the proposed project and project variant. These on-street zones would each be about 60 feet in length and could accommodate up to three passenger vehicles each. Passenger loading would also occur on site at the proposed roundabout at the terminus of the Walnut Street extension into the project site. This proposed circulation feature would allow residents and guests to be picked up or dropped off at the center of the site.

Passenger Loading

The proposed supply of on-street passenger loading spaces (three 60-foot-long zones which could support a total of three vehicles in each zone for a total of nine vehicles), and the Walnut Street roundabout, would exceed the projected passenger loading demand of four vehicles. The passenger loading demand estimates include demand for for-hire vehicles, e.g., transportation network companies, taxis (see the "Freight Delivery and Service Vehicle Demand" section and Table 4.C.16, p. 4.C.61). As such, it is anticipated that the proposed project or project variant would meet the demand for passenger loading. However, even if the proposed supply of loading spaces meets the overall passenger loading demand, if there is a mismatch in the location of the loading spaces, or a concentration of demand during a certain time period, there is potential for drivers to double park and impact operations on surrounding streets. Given that both the proposed passenger loading spaces and anticipated demand for passenger loading spaces would be distributed around the site, it is anticipated that the proposed supply would meet demand in terms of number, size, and location of spaces.

Passenger loading for the proposed project and project variant would not occur on California Street and would not impact existing queues at the Jewish Community Center of San Francisco as project-related loading activities would be accommodated on street on Masonic Avenue, Euclid Avenue, and Laurel Street, as well as at the Walnut Street roundabout within the project site.

Daycare Drop-Off and Pick-Up

The proposed daycare center would have a dedicated off-street area for pick-up and drop-off, which would accommodate people using the facility. Daycare center drop-off/pick-up activities would occur at Basement Level B3 of the California Street Garage at a location adjacent to the elevator lobby for the proposed daycare center. There would be 29 parking spaces dedicated to the daycare use. These daycare spaces would be used by parents or guardians to complete drop-off and pick-up as well as by staff and visitors. The proposed supply of on-site parking spaces would meet demand for daycare center drop-off and pick-up activities for the proposed project and project variant.

Thus, based on the supply and location of on-street passenger loading spaces, the roundabout at the end of the Walnut Street extension, and the dedicated off-street parking spaces at Basement Level B3 of the California Street Garage for the daycare use, the proposed project or project variant would not result in a passenger loading shortfall that would create hazardous conditions or significant delays for transit, bicycles or pedestrians. For these reasons, the proposed project and project variant would have a less-than-significant impact on passenger loading.

Emergency Access

Impact TR-11: The proposed project or project variant would not result in significant impacts on emergency access to the project site or adjacent locations. (*Less than Significant*)

Emergency access to the project site and nearby emergency treatment centers would be similar to existing conditions. Emergency vehicles would continue to have access to the perimeter of the project site to provide emergency services such as fire protection for the proposed new buildings along California Street, Presidio Avenue, Masonic Avenue, Euclid Avenue, and Laurel Street. They would be able to access the center of the site via the Walnut Street extension, the west end of the proposed Mayfair Walk, and the south end of the proposed Walnut Walk at the intersection of Masonic and Euclid avenues. Although there would be a general increase in vehicle traffic from the additional activity at the site, the proposed project or project variant would not inhibit emergency access to the project site.

The Walnut Street extension and proposed internal pedestrian network (Mayfair and Walnut walks) would provide a 20-foot (minimum) clear width. Clear widths would be sufficient to accommodate emergency vehicles and meet fire department requirements.[93] The proposed project or project variant would remove the triangular-shaped pedestrian island and the right-most travel lane for southbound traffic on Presidio Avenue merging onto Masonic Avenue, construct a corner bulb-out on the west side of the Masonic Avenue/Presidio Avenue/Pine Street intersection, and install a continental crosswalk crossing Presidio Avenue. The proposed project or project variant would reconfigure the west curb line on Masonic Avenue and remove the triangular-shaped pedestrian island and right-most travel lane for southbound traffic on Masonic Avenue merging onto Euclid Avenue to regularize the intersection of Masonic Avenue and Euclid Avenue. The proposed project or project variant would also add a corner bulb-out at the northeast corner of Euclid Avenue and Laurel Street, a corner bulb-out at the northeast corner of Laurel Street/Mayfair Drive and an eastside crosswalk at the three-way intersection (crossing Mayfair Drive). A fire access evaluation of turning radii indicates that emergency vehicles could access the project site from all directions and travel along the Mayfair and Walnut walks. Truck turning diagrams illustrating vehicle turning maneuvers are included in EIR Appendix D.

Emergency vehicles would access the site from the north via the Walnut Street/California Street intersection, from the west via Mayfair Drive, and from the south at the intersection of Masonic and Euclid avenues. The Walnut Street roundabout and Mayfair and Walnut walks have been designed to accommodate the truck turning movements of a City and County of San Francisco articulated fire truck and a ladder truck.

Development of the project site, and associated increases in vehicles, pedestrians, and bicycle travel would not substantially affect emergency vehicle access to other buildings or land uses in the area or to emergency treatment centers such as the one at 3700 California Street (California Pacific Medical Center's California Campus).[94] The fire department conducted a preliminary review of the development plans and streetscape changes as currently proposed.[95] Prior to finalizing the design and dimensions of Walnut Street, the Walnut Street roundabout, the on-site

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[93] San Francisco Fire Code, Chapter 5, Fire Service Features, Section 503, Fire Apparatus Access Roads, Section 503.2.1, http://sf-fire.org/501-street-widths-emergency-access, accessed May 25, 2018.

[94] Sutter Health's California Pacific Medical Center's California Campus at 3700 California Street is expected to close in 2020 when the new hospital on Van Ness Avenue is open. Planning Department Notice of Preparation of an EIR for 3700 California Street, Case No. 2017-003559ENV, September 19, 2018.

[95] San Francisco Fire Department Housing Decision Memo from Captain Mike Pratt to Public Works Infrastructure Taskforce, Department of Building Inspection re: Meeting Notes for 3333 California Project, May 14, 2018.

pedestrian network, and the streetscape modifications on Presidio/Masonic Avenue/Pine Street adjacent to San Francisco Fire Station No. 10, the project sponsor would coordinate the design details with the police and fire departments for final review and approval, as required, to minimize the potential for impacts on emergency vehicle access to the project site or adjacent locations. For these reasons, the proposed project or project variant would result in a less-than-significant impact on emergency access.

CUMULATIVE IMPACTS

The geographic context for the analysis of cumulative impacts is the transportation study area shown on Figure 4.C.1: Transportation Study Area and Study Intersections. The cumulative impacts analysis takes into account reasonably foreseeable probable future development projects in the study area that would contribute to use of the transportation system. Past, present, and reasonably foreseeable future projects within a quarter-mile radius are identified in Figure 4.A.1: Cumulative Projects, in Section 4.A, Introduction to Chapter 4, p. 4.A.12. The 2040 future cumulative scenario was established based on a review of planned and reasonably foreseeable future projects and SF-CHAMP travel demand model forecasts.

CUMULATIVE CONSTRUCTION IMPACTS

Impact C-TR-1: Construction of the proposed project or project variant, in combination with reasonably foreseeable future projects, would not result in a cumulatively considerable contribution to cumulative construction-related transportation impacts. (*Less than Significant*)

The construction of the proposed project or project variant may overlap with construction of other reasonably foreseeable future development and transportation infrastructure projects, including the 2670 Geary Boulevard project, the 3700 California Street project, and Geary Bus Rapid Transit project, all of which are within a radius of approximately a quarter-mile of the 3333 California Street project site. Construction of 2670 Geary Boulevard (to the south of the project site) is anticipated to begin within the next year and would likely be near completion during the demolition and excavation construction activities for Phase 1 (Masonic and Euclid buildings) of the construction program for the proposed project or project variant. Sutter Health is expected to vacate the California Pacific Medical Center campus located at 3700 California Street (to the west of the project site) and move to a new location by 2020. Construction of the proposed 3700 California Street project is anticipated to run concurrently with construction of 3333 California Street and would commence around the same time. The 3700 California Street project would develop up to 250 dwelling units; given the smaller scale of this project, contribution to cumulative construction activities would be minimal. Construction of the 2670 Geary Boulevard, 3700 California Street, and Geary Bus Rapid Transit projects would not combine to result in significant cumulative construction-related transportation impacts due to limited construction overlaps and the distances between these projects. There are no other planned development projects nearby, other than the proposed project or project variant, that would contribute to cumulative construction-related transportation impacts.

It is anticipated that construction of the proposed project or project variant would occur over a time period of 7 to 15 years. Construction of the reasonably foreseeable future projects in the vicinity of the project site could temporarily generate increased traffic at the same time and on the same roads as the proposed project or project variant. As part of the construction permitting process and similar to the requirements for the proposed project or project variant, each development project would be required to work with the various City departments to develop detailed and coordinated construction logistics and contractor parking plans, as applicable, that would address construction vehicle routing, traffic control, transit movement, pedestrian movement, and bicycle movement adjacent to the construction area. Overall, because the proposed construction activities of the cumulative projects would, to the maximum extent feasible, accommodate construction and staging activities on their respective project sites, and would also be required to conduct construction in accordance with City requirements, the proposed project or project variant in combination with past, present and reasonably foreseeable developments in San Francisco, would result in less-than-significant cumulative construction-related transportation impacts. As noted above under Impact TR-1 (pp. 4.C.68-4.C.74), the proposed project or project variant would implement Improvement Measure I-TR-1 to further reduce the less-than-significant contribution to cumulative construction-related impacts.

CUMULATIVE VMT IMPACTS

Impact C-TR-2: The proposed project's or project variant's incremental effects on regional VMT would be significant, when viewed in combination with past, present, and reasonably foreseeable future projects. (*Less than Significant with Mitigation*)

San Francisco 2040 cumulative conditions were projected using a SF-CHAMP model run, using the same methodology as outlined for existing conditions, but including residential and job growth estimates and reasonably foreseeable transportation investments through 2040, as shown in Table 4.C.23: Projected 2040 Average Daily Vehicle Miles Traveled – Cumulative Conditions.

Table 4.C.23: Projected 2040 Average Daily Vehicle Miles Traveled – Cumulative Conditions

Land Use	Bay Area VMT		TAZ 709
	Regional Average	Regional Average minus 15%	
Households (Residential)	16.1	13.7	6.6
Employment (Office)	17.1	14.5	8.9
Visitors (Retail)	14.6	12.4	7.8

Source: San Francisco Planning Department Transportation Information Map, accessed May 25, 2018

As shown in Table 4.C.23, projected 2040 average daily VMT per capita for residential uses is 6.6 for the TAZ in which the project is located (TAZ 709). This is 59 percent below the 2040 projected regional average daily VMT per capita of 16.1 for residential uses. Projected 2040 average daily VMT per employee for office uses is 8.9 for the project's TAZ, which is 48 percent below the 2040 projected regional average daily VMT of 17.1 per employee for office uses. Projected 2040 average daily VMT per employee for retail uses is 7.8 for the proposed project's TAZ, which is 47 percent less than the 2040 projected regional average daily VMT of 14.6 per employee for retail uses.

Influence of Parking on VMT

As discussed previously under Impact TR-2 "VMT Impacts", pp. 4.C.74-4.C.80, and shown in Table 4.C.19, p. 4.C.77, the proposed project would provide parking at a rate 11 percent higher than the neighborhood average for residential uses. The proposed project would provide parking at a rate 38 percent higher than the existing neighborhood average rate for other non-residential (office and daycare) uses, and 136 percent higher than the existing neighborhood average for retail uses.

The project variant would provide parking at a rate 11 percent higher than the existing neighborhood average for residential uses. The project variant would provide parking at a rate 37 percent higher than the existing neighborhood average rate for other non-residential (daycare) uses and 150 percent higher than the neighborhood average for retail uses. As mentioned on p. 4.C.79, more off-street vehicular parking is linked to more driving. Therefore, the amount of parking provided by the proposed project or project variant would increase the VMT of the proposed project or project variant relative to the TAZ average.

As shown in Table 4.C.23, the project site is in a TAZ with average daily VMT per capita for the mix of proposed uses that is more than 15 percent below the regional averages by use. With implementation of Mitigation Measure M-TR-2: Reduce Retail Parking Supply, pp. 4.C.80, the proposed retail parking supply would be reduced to a level that would not substantially increase VMT, resulting in a less-than-significant cumulative VMT impact. Therefore, the proposed project or project variant would not make a considerable contribution to cumulative increases in VMT because it would be below the planning department's cumulative threshold of 15 percent below the regional average. Furthermore, implementation of Mitigation Measure M-TR-2 would ensure that the proposed project or project variant would not conflict with the sustainability targets of *Plan Bay Area 2013*.

Impact of Proposed Project or Project Variant on Induced Travel and VMT

The proposed project and project variant are not transportation projects. However, the proposed project and project variant would include features that would alter the transportation network.

These features include widened sidewalks, bicycle facilities/amenities, on-street loading zones, new curb cuts, the new Walnut Street extension, internal walkways, and removal of channelized right-turns as described in Chapter 2, Project Description, on pp. 2.75-2.80. These features fit within the general types of projects that would not substantially induce automobile travel. Therefore, the VMT impact related to the proposed streetscape modifications and other project features would be less than significant.

CUMULATIVE TRAFFIC HAZARD IMPACTS

Impact C-TR-3: The proposed project or project variant would not contribute considerably to a major traffic hazard. (*Less than Significant*)

The proposed project or project variant would have a significant cumulative impact on traffic if the project, in combination with other long-term (by 2040) forecast growth, would cause a major traffic hazard in the study area and the project would make a considerable contribution to this cumulative traffic hazard. In general, the proposed project or project variant and other local and regional growth would add vehicle trips to surrounding roadways; however, a general increase in traffic in and of itself would not be considered a traffic hazard.

Consistent with the City's Better Streets Plan and Transit-First Policy, roadway improvements throughout the City, including the study area, are contemplated to improve overall safety and encourage sustainable modes of transportation. Similar to the proposed project or project variant, other cumulative development projects such as those located along Geary Boulevard south of the project site (the 2675 Geary Boulevard and 2670 Geary Boulevard projects) and those west of the project site along California Street, e.g., 3700 California Street, would be located on infill sites and would conform to the requirements of the Better Streets Plan, the Transit-First Policy, and the Transportation Demand Management program. In addition, other cumulative transportation infrastructure projects such as the Geary Boulevard Bus Rapid Transit project and the Muni Forward improvements along California Street would be implemented and would include design features that promote walking, bicycling and transit use. These cumulative projects would add additional vehicles to the study area, but the combination of roadway and safety improvements would not combine with the proposed project or project variant to create traffic hazards on roadways surrounding the project site.

Overall, the proposed project or project variant in combination with past, present and reasonably foreseeable cumulative development in the project vicinity would result in less-than-significant cumulative traffic hazard impacts.

Implementation of Improvement Measure I-TR-3: Driveway Queue Abatement, pp. 4.C.81-4.C.83, would further reduce the less-than-significant cumulative impacts related to traffic hazards by ensuring that recurring vehicle queues do not occur at the project driveways or on the public right-of-way and by further reducing hazards between vehicles entering/exiting the project driveway and vehicles accessing the Laurel Village Shopping Center surface parking lot across the street.

CUMULATIVE TRANSIT IMPACTS

Impact C-TR-4: The proposed project or project variant would not contribute considerably to significant cumulative transit capacity impacts on Muni screenlines. (*Less than Significant*)

Table 4.C.24: Muni Downtown Screenlines – Cumulative Conditions – Weekday A.M. Peak Hour (Inbound) and Table 4.C.25: Muni Downtown Screenlines – Cumulative Conditions – Weekday P.M. Peak Hour (Outbound) present ridership and capacity utilization data for Muni screenlines with transit trips generated by the project variant and percent contribution to the cumulative ridership for the weekday a.m. and weekday p.m. peak hours.

Future 2040 cumulative transit ridership projections were developed based on transit growth projections prepared for Muni Forward (previously the Transit Effectiveness Project). Transit ridership generated by the proposed project would be less than that generated by the project variant. As such, 2040 cumulative ridership and capacity utilization conditions are presented for the project variant, and impacts identified for the proposed project would be similar to or less than those identified for the project variant.

As shown in Tables 4.C.24 and 4.C.25, the following screenlines and corridors would exceed 85 percent capacity utilization in 2040:

- California corridor (Northwest Screenline) – 86 percent utilization during the weekday a.m. peak hour and 87 percent utilization during the weekday p.m. peak hour
- Sutter/Clement corridor (Northwest Screenline) – 99 percent utilization during the weekday p.m. peak hour
- Fulton/Hayes corridor (Northwest Screenline) – 99 percent utilization during the weekday a.m. peak hour and 94 percent utilization during the weekday p.m. peak hour
- Mission corridor (Southeast Screenline) – 104 percent utilization during the weekday a.m. peak hour and 89 percent utilization during the weekday p.m. peak hour
- San Bruno/Bayshore corridor (Southeast Screenline) – 89 percent utilization during the weekday a.m. peak hour and 85 percent utilization during the weekday p.m. peak hour
- Other lines corridor (Southeast Screenline) – 89 percent utilization during the weekday a.m. peak hour
- Subway Lines corridor (Southwest Screenline) – 90 percent utilization during the weekday a.m. peak hour
- Haight/Noriega corridor (Southwest Screenline) – 89 percent utilization during the weekday a.m. peak hour
- Northwest Screenline – 87 percent utilization during the weekday p.m. peak hour
- Southwest Screenline – 86 percent utilization during the weekday a.m. peak hour

Table 4.C.24: Muni Downtown Screenlines – Cumulative Conditions – Weekday A.M. Peak Hour (Inbound)

Muni Screenline	Baseline			Cumulative			Cumulative with Project Variant		
	Ridership	Capacity	Utilization	Ridership	Capacity	Utilization	Project Trips	Ridership	Percent Contribution
Northeast									
Kearny/Stockton	2,273	3,157	72%	7,394	9,473	78%	0	7,394	0.0%
Other lines	867	1,470	59%	758	1,785	42%	0	758	0.0%
Screenline Total	*3,140*	*4,627*	*68%*	*8,152*	*11,258*	*72%*	*0*	*8,152*	*0.0%*
Northwest									
Geary	2,302	3,763	61%	2,673	3,763	71%	28	2,701	1.0%
California	1,436	2,010	71%	1,989	2,306	**86%**	40	2,029	2.0%
Sutter/Clement	514	630	82%	581	756	77%	28	609	4.6%
Fulton/Hayes	1505	2,237	67%	1,962	1,977	**99%**	0	1,962	0.0%
Balboa	553	1008	55%	690	1,008	68%	0	690	0.0%
Screenline Total	*6,310*	*9,648*	*65%*	*7,895*	*9,810*	*80%*	*96*	*7,991*	*1.2%*
Southeast									
Third Street	1025	3808	27%	2422	5712	42%	0	2422	0.0%
Mission	2,155	2,632	82%	3,117	3,008	**104%**	0	3,117	0.0%
San Bruno/Bayshore	1,867	2,197	85%	1,952	2,197	**89%**	0	1,952	0.0%
Other lines	1,577	1,712	**92%**	1,795	2,027	**89%**	0	1,795	0.0%
Screenline Total	*6,624*	*10,349*	*64%*	*9,286*	*12,944*	*72%*	*0*	*9,286*	*0.0%*
Southwest									
Subway lines	6,783	7,020	**97%**	6,314	7,020	**90%**	0	6,314	0.0%
Haight/Noriega	1,178	1,596	74%	1,415	1,596	**89%**	0	1,415	0.0%
Other lines	474	560	85%	175	560	31%	0	175	0.0%
Screenline Total	*8,435*	*9,176*	***92%***	*7,904*	*9,176*	***86%***	*0*	*7,904*	*0.0%*
Muni Screenlines Total	*24,509*	*33,800*	*73%*	*33,237*	*43,188*	*77%*	*96*	*33,333*	*0.3%*

Note:

Bold indicates capacity utilization of 85 percent or greater. Screenlines analyzed as inbound and outbound Muni operations direction for the weekday a.m. and p.m. peak hours, respectively.

Source: San Francisco Planning Department, *Transit Data for Transportation Impact Studies*, May 2015. See EIR Appendix D for Transit Line Capacity Calculations

Table 4.C.25: Muni Downtown Screenlines – Cumulative Conditions – Weekday P.M. Peak Hour (Outbound)

Muni Screenline	Baseline			Cumulative			Cumulative with Project Variant		
	Ridership	Capacity	Utilization	Ridership	Capacity	Utilization	Project Trips	Ridership	Percent Contribution
Northeast									
Kearny/Stockton	2,444	3,327	73%	6,295	8,329	76%	0	6,295	0.0%
Other lines	1134	1,750	65%	1229	2,065	60%	0	1229	0.0%
Screenline Total	*3,578*	*5,077*	*70%*	*7,524*	*10,394*	*72%*	*0*	*7,524*	*0.0%*
Northwest									
Geary	2,913	3,621	80%	2,996	3,621	83%	35	3,031	1.2%
California	1,349	1,752	77%	1,766	2,021	**87%**	45	1,811	2.5%
Sutter/Clement	523	630	83%	749	756	**99%**	27	776	3.5%
Fulton/Hayes	1544	1,838	84%	1,762	1,878	**94%**	0	1762	0.0%
Balboa	537	974	55%	776	974	80%	0	776	0.0%
Screenline Total	*6,866*	*8,815*	*78%*	*8,049*	*9,250*	***87%***	*107*	*8,156*	*1.3%*
Southeast									
Third Street	1836	3808	48%	2300	5712	40%	0	2300	0.0%
Mission	1,927	2,632	73%	2,673	3,008	**89%**	0	2,673	0.0%
San Bruno/Bayshore	1,035	2,134	49%	1,817	2,134	**85%**	0	1,817	0.0%
Other lines	1,213	1,612	75%	1,582	1,927	82%	0	1,582	0.0%
Screenline Total	*6,011*	*10,186*	*59%*	*8,372*	*12,781*	*66%*	*0*	*8,372*	*0.0%*
Southwest									
Subway lines	5,433	6,804	80%	5,692	6,804	84%	0	5,692	0.0%
Haight/Noriega	1,065	1,596	67%	1,265	1,596	79%	0	1,265	0.0%
Other lines	655	841	78%	380	840	45%	0	380	0.0%
Screenline Total	*7,153*	*9,241*	*77%*	*7,337*	*9,240*	*79%*	*0*	*7,337*	*0.0%*
Muni Screenlines Total	*23,608*	*33,319*	*71%*	*31,282*	*41,665*	*75%*	*107*	*31,389*	*0.3%*

Note:

Bold indicates capacity utilization of 85 percent or greater. Screenlines analyzed as inbound and outbound Muni operations direction for the weekday a.m. and p.m. peak hours, respectively.

Source: San Francisco Planning Department, *Transit Data for Transportation Impact Studies*, May 2015. See EIR Appendix D for Transit Line Capacity Calculations

As shown in Tables 4.C.24 and 4.C.25, the project variant would add transit riders to the California and Sutter/Clement corridors that would exceed Muni's capacity utilization standard of 85 percent during the weekday a.m. or weekday p.m. peak hours. However, the addition of project trips would cause an increase in ridership of less than 5 percent on these corridors and screenlines operating above the established 85 percent utilization threshold and would not be considered significant.

Thus, the proposed project or project variant would not contribute considerably to significant cumulative transit capacity impacts on Muni screenlines and impacts would be less than significant.

Impact C-TR-5: The proposed project or project variant would not contribute considerably to significant cumulative transit delay impacts. (*Less than Significant*)

Traffic volumes would change in the study area as a result of implementation of the proposed project or project variant and 2040 cumulative conditions due to buildout of planned developments. Dedicated bus rapid transit lanes would be provided on Geary Boulevard. A detailed description of the assessment of the potential effects of the proposed project or project variant on transit delays that would affect operations of transit lines operating along California Street and/or Presidio Avenue, such as the 1 California, 2 Clement, 3 Jackson, and 43 Masonic is provided in Impact TR-5 (see p. 4.C.88). Based on the findings of this localized impact analysis of project-related volume, vehicle delay, and queueing, the project-related increase in traffic volumes would result in less than a two-second increase in intersection average delay and an increase of less than five seconds on any approach. The proposed project or project variant would result in an incremental increase in cumulative traffic volumes at study intersections and would not contribute substantially to increases in delay at the intersection or on any individual approaches. Furthermore, the closest regional transit providers to the project site are Golden Gate Transit buses traveling along Geary Boulevard and Park Presidio Avenue. Given the distance from the site and the incremental increase to cumulative traffic volumes attributable to the proposed project or project variant, any contribution to cumulative impacts on regional transit service would be less than significant. Thus, the proposed project or project variant would not contribute considerably to any significant cumulative transit delay impacts.

Impact C-TR-6: The proposed project or project variant would not contribute considerably to significant cumulative transit capacity impacts on regional transit routes. (*Less than Significant*)

As previously noted, transit ridership generated by the proposed project would be less than that generated by the project variant. As such, ridership and capacity utilization analysis is presented for the project variant and impacts identified for the proposed project would be similar or less than those identified for the project variant.

Transit trips were assigned to the regional routes based on the likely origins and destinations of the trips and the available capacity for each regional provider. Table 4.C.26: Regional Transit Screenlines – Cumulative Conditions – Weekday A.M. Peak Hour (Inbound) and Table 4.C.27: Regional Transit Screenlines – Cumulative Conditions – Weekday P.M. Peak Hour (Outbound) present the ridership and capacity utilization at regional screenlines with transit trips generated by the project variant and percent contribution to the cumulative ridership during the weekday a.m. and weekday p.m. peak hours.

As shown in the tables, all regional screenlines and most operators would operate within established utilization standards. The following regional operator would exceed the established capacity utilization standard of 100 percent in 2040:

- BART (East Bay Screenline) – 118 percent utilization during the weekday a.m. peak hour and 112 percent utilization during the weekday p.m. peak hour

The project variant would add transit riders to BART on the East Bay regional transit screenline, which would exceed capacity utilization standards in the weekday a.m. and p.m. peak hours under cumulative conditions. However, the addition of project trips would cause an increase in ridership of less than 5 percent on all regional operators and would not cause any of the regional screenlines or operators to exceed the 100 percent capacity utilization threshold and would not be considered significant.

Thus, the proposed project or project variant would not contribute considerably to significant cumulative transit capacity impacts on regional screenlines and impacts would be less than significant.

Table 4.C.26: Regional Transit Screenlines – Cumulative Conditions – Weekday A.M. Peak Hour (Inbound)

Regional Screenline	Baseline Conditions			Cumulative Conditions			Cumulative with Project Variant Conditions		
	Ridership	Capacity	Utilization	Ridership	Capacity	Utilization	Project Trips	Ridership	Percent Contribution
East Bay									
BART	28,000	25,680	**109%**	38,000	32,100	**118%**	15	38,015	0.05%
AC Transit	1,596	2,829	56%	7,000	12,000	58%	1	7,001	0.01%
Ferries	818	1,170	70%	4682	5,940	79%	0	4,682	0.00%
Screenline Total	*30,414*	*29,679*	***102%***	*49,682*	*50,040*	*99%*	*16*	49,698	*0.03%*
North Bay									
Golden Gate Transit Bus	1,344	2,543	53%	1,990	2,543	78%	4	1,994	0.17%
Ferries	1,088	1,959	56%	1,619	1,959	83%	4	1,623	0.18%
Screenline Total	*2,432*	*4,502*	*54%*	*3,609*	*4,502*	*80%*	*8*	3,617	*0.18%*
South Bay									
BART	16,000	21,400	75%	13,942	24,182	58%	8	13,950	0.03%
Caltrain	2,258	3,100	73%	2,310	3,600	64%	1	2,311	0.03%
SamTrans	266	520	51%	271	520	52%	0	271	0.03%
Ferries	-		-	59	200	30%	--		--
Screenline Total	*18,524*	*25,020*	*74%*	*16,582*	*28,502*	*58%*	*9*	16,591	*0.03%*
Regional Screenlines Total	*51,370*	*59,201*	*87%*	*69,873*	*83,044*	*84%*	*33*	69,906	*0.04%*

Note: **Bold** indicates capacity utilization of 100 percent or greater. Screenlines analyzed as inbound and outbound Muni operations direction for the weekday a.m. and p.m. peak hours, respectively.

Source: San Francisco Planning Department, *Updated BART Regional Screenlines – Revised*, October 2016. See EIR Appendix D for Transit Line Capacity Calculations

Table 4.C.27: Regional Transit Screenlines – Cumulative Conditions – Weekday P.M. Peak Hour (Outbound)

Regional Screenline	Baseline Conditions			Cumulative Conditions			Cumulative with Project Variant Conditions		
	Ridership	**Capacity**	**Utilization**	**Ridership**	**Capacity**	**Utilization**	**Project Trips**	**Ridership**	**Percent Contribution**
East Bay									
BART	27,000	25,680	**105%**	36,000	32,100	**112%**	18	36,018	0.06%
AC Transit	2,297	3,926	59%	7,000	12,000	58%	2	7,002	0.02%
Ferries	813	1,615	50%	5,319	5,940	90%	1	5,320	0.02%
Screenline Total	*30,110*	*31,221*	*96%*	*48,319*	*50,040*	*97%*	*20*	48,339	*0.04%*
North Bay									
Golden Gate Transit Bus	1,399	2,817	50%	2,070	2,817	73%	6	2,076	0.21%
Ferries	973	1,959	50%	1619	1,959	83%	4	1,623	0.21%
Screenline Total	*2,372*	*4,776*	*50%*	*3,689*	*4,776*	*77%*	*10*	3,699	*0.21%*
South Bay									
BART	15,000	21,400	70%	13,971	24,182	58%	9	13,980	0.04%
Caltrain	2,472	3,100	80%	2,529	3,600	70%	2	2,531	0.05%
SamTrans	147	320	46%	150	320	47%	0	150	0.03%
Ferries	-	-	-	59	200	30%	--		--
Screenline Total	*17,619*	*24,820*	*71%*	*16,709*	*28,302*	*59%*	*11*	16,720	*0.04%*
Regional Screenlines Total	*50,101*	*60,817*	*82%*	*68,717*	*83,118*	*83%*	*41*	68,758	*0.05%*

Note: **Bold** indicates capacity utilization of 100 percent or greater. Screenlines analyzed as inbound and outbound Muni operations direction for the weekday a.m. and p.m. peak hours, respectively.

Source: San Francisco Planning Department, *Updated BART Regional Screenlines – Revised*, October 2016. See EIR Appendix D for Transit Line Capacity Calculations

CUMULATIVE PEDESTRIAN CONDITIONS

Impact C-TR-7: The proposed project or project variant would not contribute considerably to significant cumulative pedestrian impacts. (*Less than Significant*)

In general, the proposed project or project variant and other local and regional growth would add vehicle and pedestrian trips to surrounding roadways; however, a general increase in traffic in and of itself would not be considered to result in a significant cumulative impact. As described in "Project Features" on pp. 4.C.38-4.C.43, the proposed project and project variant would include numerous sidewalks, traffic control modifications, and intersection pedestrian crossing treatments that would improve and define the pedestrian network adjacent to the project site. Additionally, the qualitative discussion and evaluation of pedestrian facilities and circulation in the study area on pp. 4.C.20-4.C.22 and a discussion of 2040 cumulative conditions transportation network improvements is provided on pp. 4.C.65-4.C.68.

Although the proposed project or project variant is expected to increase vehicle and pedestrian travel in the area, changes to local roadways are generally designed to adopted standards developed to ensure the safe circulation for all travel modes and to minimize conflict points between vehicles and pedestrians. Similar to the proposed project or project variant, past, present, and reasonably foreseeable future projects would be required to adhere to City policies, plans, and programs, which would include implementing transportation demand management measures to minimize vehicle travel and complying with Better Streets Plan requirements for sidewalk widths and streetscape modifications. Furthermore, as previously discussed, pedestrian network modifications including bulbouts, sidewalk widening, and traffic signal infrastructure upgrades would be implemented as part of the Geary Bus Rapid Transit Phase 2 improvements.

For the above reasons, the proposed project and project variant, in combination with past, present, and reasonably foreseeable development in the area, would result in less-than-significant cumulative pedestrian impacts.

CUMULATIVE BICYCLE CONDITIONS

Impact C-TR-8: The proposed project or project variant would not contribute considerably to a significant cumulative bicycle impact. (*Less than Significant*)

In general, the proposed project or project variant and other local and regional growth would add vehicle and bicycle trips to surrounding roadways; however, a general increase in traffic in and of itself would not be considered to result in a significant cumulative bicycle impact. The proposed project or project variant would include on-site bicycle facilities and amenities, on-street (class 2) and off-street (class 1) bicycle parking, streetscape modifications, and intersection crossing treatments that would improve the bicycle network on and adjacent to the project site. A qualitative discussion and evaluation of bicycle facilities and circulation in the study area is presented on pp. 4.C.22-4.C.25 and a discussion of 2040 cumulative conditions transportation improvements is presented on pp. 4.C.65-4.C.70.

Although the proposed project or project variant is expected to increase vehicle and bicycle travel in the area, changes to local roadways are generally designed to adopted standards developed to ensure the safe circulation for all travel modes and to minimize conflict points between vehicles and bicyclists. Similar to the proposed project or project variant, past, present, and reasonably foreseeable future projects would be required to adhere to City policies, plans, and programs, which would include implementing transportation demand management measures to minimize vehicle travel and complying with better streets plan requirements for streetscape modifications. As previously discussed, no major modifications to the bicycle network are under consideration for any reasonably foreseeable cumulative development or transportation improvement projects, and significant cumulative bicycle impacts would not be expected.

For the above reasons, the proposed project and project variant, in combination with past, present, and reasonably foreseeable development in the area, would result in less-than-significant cumulative bicycle impacts.

CUMULATIVE FREIGHT LOADING CONDITIONS

Impact C-TR-9: The proposed project or project variant would not contribute considerably to a significant cumulative freight loading impact. (*Less than Significant*)

While there would be a general increase in vehicle traffic and freight loading demand associated with planned and reasonably foreseeable development, loading impacts would be localized and site-specific and would not contribute to impacts from other development projects near the project site. Past, present, and reasonably foreseeable future projects would be required to provide freight loading facilities in accordance with planning code requirements.

The proposed project's or project variant's estimated freight loading demand, shown on pp. 4.C.61-4.C.62, would be met at the proposed on-site loading docks and the on-street commercial loading zones on the project site frontages. The nearest planned development is located over two blocks away at 3700 California Street. Overall, because loading tends to occur as close to the delivery point as possible, it is expected that loading demand associated with the proposed project or project variant would be accommodated by proposed loading facilities. Furthermore, because loading would occur near the delivery site, it is not likely that any unmet loading demand from other cumulative projects within the study area would interfere with the project site. Thus, there is no significant cumulative loading impact in the project area. Consequently, the project would not make a considerable contribution to cumulative loading impacts and cumulative impacts are less than significant.

Implementation of Improvement Measures I-TR-9a and I-TR-9b, pp. 4.C.97-4.C.98, would further reduce the less-than-significant cumulative impact related to freight loading.

Impact C-TR-10: The proposed project or project variant would not contribute considerably to a significant cumulative passenger loading impact. (*Less than Significant*)

While there would be a general increase in passenger loading demand associated with planned and reasonably foreseeable development, loading impacts are localized and site-specific and would not contribute to impacts from other development projects near the project site. The proposed project's or project variant's estimated passenger loading demand, shown on p. 4.C.61, would be met at the proposed on-street loading zones and on site at the Walnut Street roundabout and in Basement Level B3 of the California Street Garage.

Furthermore, passenger loading demand associated with planned developments in the project vicinity would be concentrated near each individual site and each development project would be required to address any project-related loading impacts. The nearest planned development is located over two blocks away at 3700 California Street. Passenger loading demand associated with this and other past, present, and reasonably foreseeable development would not be anticipated to affect passenger loading conditions at the project site or create a significant cumulative passenger loading impact.

For the above reasons, the proposed project and project variant, in combination with past, present, and reasonably foreseeable development in the area, would result in less-than-significant cumulative passenger loading impacts.

CUMULATIVE EMERGENCY ACCESS

Impact C-TR-11: The proposed project or project variant would not contribute considerably to a significant cumulative impact on emergency vehicle access. (*Less than Significant*)

As described above, the project site is immediately west of the San Francisco Fire Station No. 10, which is located on Presidio Avenue across Masonic Avenue between Pine and Bush streets. Vehicular and pedestrian access to the fire station is from Presidio Avenue. Fire truck ingress and egress occurs on Presidio Avenue, approximately 160 feet south of Pine Street. KEEP CLEAR markings are located in front of the 57-foot-wide driveway. Under cumulative conditions, emergency vehicle access to the project site and nearby land uses would be similar to existing conditions.

In general, the proposed project or project variant and other local and regional growth would add vehicle trips to surrounding roadways; however, these trips would be distributed over the network and would not be anticipated to substantially increase delays at nearby intersections or roadway segments that would result in a significant increase to emergency response times. Furthermore, the proposed project and project variant would be designed to not impede access and to ensure clear ingress/egress for the fire department's vehicles into Fire Station No. 10.

With implementation of the bus rapid transit project on Geary Boulevard and other changes to the transportation network, emergency vehicle providers may adjust travel routes to respond to incidents; however, emergency vehicle access in the area would not be substantially affected. Emergency vehicles would be permitted full use of transit-only lanes and would not be subject to any turn restrictions.

For the above reasons, the proposed project and project variant, in combination with past, present, and reasonably foreseeable development in the area, would result in less-than-significant cumulative emergency vehicle access impacts.

PARKING INFORMATION

This section includes a discussion of the existing parking supply, the overall availability of parking in the broader study area, the proposed project's and project variant's parking supply, Planning Code requirements, and the calculated project-generated parking demand. The proposed project and project variant meet the public resources code criteria as a residential, mixed use infill project in a transit priority area and therefore parking is not an environmental impact for the purposes of CEQA. As such, this section is provided for informational purposes only.

Parking conditions are not static, as parking supply and demand vary from day to day, from day to night, from month to month, etc. Hence, the availability of parking spaces (or lack thereof) is not a permanent physical condition but changes over time as people change their modes and patterns of travel. While parking conditions change over time, a substantial deficit in parking caused by a project that creates hazardous conditions or major delays to traffic, transit, bicycles, or pedestrians could adversely affect the physical environment. Whether a deficit in parking creates such conditions will depend on the magnitude of the shortfall and the ability of drivers to change travel patterns or switch to other travel modes. If a substantial deficit in parking caused by a project creates hazardous conditions or major delays in travel, such a condition also could result in secondary physical environmental impacts (e.g., air quality or noise impacts cause by congestion), depending on the project and its setting.

The absence of a ready supply of parking spaces, combined with available options other than auto travel (e.g., transit service, taxis, bicycles, or walking) and a relatively dense pattern of urban development, induces many drivers to seek and find alternative parking facilities, shift to other modes of travel, or change their overall travel habits. Any such resulting shifts to transit service or other modes (walking and biking) would be in keeping with the City's Transit First Policy and numerous general plan policies, including those in the transportation element, as discussed previously in the "Regulatory Framework," p. 4.C.31. The City's Transit First Policy, established in the City's Charter Article 8A, section 8A.115, provides that "parking policies for areas well served by public transit shall be designed to encourage travel by public transportation and alternative transportation."

Existing Parking Conditions

This section provides an inventory of existing parking provided on the project site as well as parking provided in on-street and off-street parking facilities in the study area.[96]

On-Site Parking

The project site currently provides 543 vehicle parking spaces. A total of 331 vehicle parking spaces, including 60 publicly available spaces, are provided in three surface parking lots on the project site. A total of 212 vehicle parking spaces are provided in a three-level partially below-grade parking garage. There are currently five car share parking spaces on the site.

The surface parking lot on the northeast portion of the project site (east of the Walnut Street extension) is a 60-space paid public parking area used primarily by neighborhood residents and visitors and for overflow parking from the Jewish Community Center of San Francisco across California Street. The surface parking lots on the northwest (near the annex building) and western (along the western edge of the existing office building) portions of the project site as well as the existing parking garage are reserved for UCSF staff and require payment for monthly parking permits. Vehicular pick-up and drop-off for the daycare center and freight loading operations occur along the western edge of the existing office building. Commercial trucks weighing over 3 tons are required to use the California Street entrance rather than the Laurel Street or Mayfair Drive entrances.

[96] Information on off-street and metered on-street parking is available through SFMTA's SFpark program, http://sfpark.org/, accessed June 12, 2018.

On-Street Parking

There are both general metered and unmetered vehicle parking spaces along both sides of streets adjacent to the project site. Unmetered parking spaces are provided on Presidio Avenue and are unregulated except during the street sweeping period, which is scheduled to occur between 11 a.m. and 1 p.m. on the first and third Thursday of the month. There are approximately 102 on-street vehicle parking spaces (including two car share spaces on Euclid Avenue) and no loading spaces along the curbs adjacent to the site. The proposed project would reduce the number of on-street vehicle parking spaces to approximately 66 through the elimination of spaces for new curb cuts and the conversion of existing spaces to five new commercial and passenger loading zones. One new parking space would be created as a result of the streetscape changes at the Presidio Avenue/Masonic Avenue/Pine Street intersection. Overall, the proposed project and project variant would result in a net reduction of 36 on-street parking spaces. On-street vehicle parking spaces were observed to be between 80 and 100 percent occupied during field observations.

Off-Street Parking

Public parking is provided in a combination of public and private off-street parking lots/garages near the project site, including 221 vehicle parking spaces provided in the Laurel Village Shopping Center surface parking lot accessible from Laurel Street (on the east) and Spruce Street (on the west).

Proposed Project Parking Information

A summary of the estimated parking demand, code requirements/allowances, and proposed supply for the proposed project and project variant is shown in Table 4.C.28: Parking Demand and Proposed Supply.

Proposed Parking Supply

The parking program would replace and expand the existing 543 surface and subsurface parking spaces on the project site. The proposed project would provide a total of 896 off-street parking spaces. The project variant would provide a total of 970 off-street parking spaces. Both the proposed project and project variant would provide 60 public parking spaces and the proposed project would provide 11 car share spaces while the project variant would provide 9 car share parking spaces in addition to what is shown in Table 4.C.28. With implementation of Mitigation Measure M-TR-2, p. 4.C.80, the proposed project would reduce the retail parking supply by an amount not to exceed 2.14 spaces per 1,000 gross square feet of retail floor area.

Table 4.C.28: Parking Demand and Proposed Supply

Land Use	Proposed Project					Project Variant				
	Demand			Supply	Code	Demand			Supply	Code
	Long-Term	Short-Term	Total			Long-Term	Short-Term	Total		
Residential	744	28	772	558	558	991	38	1,029	744	744
Office	95	16	111	100	100	-	-	-	-	-
Retail	60	16	76			52	14	66		
Sit-Down	6	3	9	138	192	6	3	9	128	169
Composite	15	23	38			15	23	38		
Daycare	28	29	57	29	8	28	29	57	29	8
Car Share **NOTE** A	-	-	-	11	11	-	-	-	9	9
Commercial ***NOTE*** A	-	-	-	60	-	-	-	-	60	-
Total	*949*	*116*	*1,063*	*896* ***NOTE A***	*858*	*1,092*	*108*	*1,199*	*970* ***NOTE A***	*921*

Notes: The estimates in the table are overly conservative because of the factors that affect travel behavior, including provision, pricing, and availability of parking and implementation of transportation demand management measures. Totals may not add up due to rounding.

[A] The demand associated with the public parking spaces and car share spaces cannot be calculated using SF Guidelines rates because they are not associated with a specific land use at the site.

Source: Kittelson & Associates, Inc. 2017; *SF Guidelines*, 2002

Parking would be provided in four below-grade parking garages – the California Street Garage, under the Plaza A, Plaza B, and Walnut buildings; the Center Building B Garage, encompassing the two renovated below-grade parking levels under Center Building B (Basement Levels B1 and B3); the Masonic Garage, under the Masonic and Euclid buildings; and the Mayfair Garage, under the Mayfair Building – and in six individual, two-car, parking garages for six of the seven Laurel Duplexes.

Code Requirements/Allowances

Based on planning code section 151, the proposed project and project variant would be required to provide vehicle parking spaces according to the number of residential dwelling units, the gross square footage and type of commercial space, and the number of children accommodated at the on-site daycare. The code requirements were calculated using the same breakdown of restaurant and retail space as was used for the travel demand estimates. As shown in Table 4.C.28, the proposed project would be required to provide a maximum of 858 vehicle parking spaces (558 for residential use, 100 for office use, 192 for retail use, 8 for daycare, and 11 car share spaces). The project variant would be permitted to provide 921 vehicle parking spaces (744 for residential use, 169 for retail use, 8 for daycare, and 9 car share spaces).

The supply proposed by the proposed project and project variant would meet San Francisco Planning Code allowances and requirements for number and type of off-street vehicle parking for the residential, office, and car share spaces for the proposed project and project variant. The supply proposed by the proposed project and project variant would fall short of planning code requirements for the retail/restaurant use and exceed planning code requirements for the daycare use. As noted in Section 151, the minimum off-street parking requirements shall be reduced, to the extent needed, when such reduction is part of a project's compliance with the Transportation Demand Management Program set forth in Section 169 of the planning code.

Estimated Parking Demand

The daily parking demand generated by the proposed project was estimated using the methodology described in the SF Guidelines. The estimated demand for parking that a project may generate is not necessarily the same as what is required by the planning code.

As shown in Table 4.C.28, the proposed project would generate a demand for 949 long-term parking spaces and 116 short-term parking spaces. The project variant would generate a demand for 1,092 long-term parking spaces and 108 short-term parking spaces. Based on this analysis, the proposed project would result in a shortfall of 167 spaces and the project variant would result in a shortfall of 229 spaces during the peak period of parking demand. Implementation of Mitigation Measure M-TR-2, p. 4.C.80, would reduce the number of retail parking spaces provided by the proposed project or project variant so as to not exceed 2.14 spaces per 1,000 gross square feet of retail floor area. However, as discussed on pp. 4.C.74-4.C.77, based on the recent research, a reduced parking supply is one the most effective TDM measures available in the menu for the TDM Program. As such, with the reduction in the supply of parking spaces, some people who drove to the site would switch modes, or carpool, resulting in an associated reduction in parking demand.

The evaluation of whether a parking deficit is substantial and could result in hazardous conditions or delays considers whether the parking demand could be met by the overall supply of parking in the general vicinity and whether the project site is adequately served by other modes of transportation. The analysis accounts for potential secondary effects, such as cars circling and looking for parking spaces in areas of limited parking supply, by assuming all drivers would attempt to find parking at or near their destination and then seek parking farther away if convenient parking is unavailable. The secondary effects of drivers searching for parking are typically offset by a reduction in vehicle trips due to others who are aware of constrained parking conditions and choose to use another mode to reach their destination.

On-street parking is provided on streets near the project site and there are multiple public parking facilities within 1 mile of the site. Given the project's location in proximity to high-quality local transit services with connections to regional transit, the implementation of transportation demand management measures, and the availability of on- and off-street public parking facilities, the proposed project and project variant would not create a substantial parking deficit.

The Planning Commission has wide latitude for decisions regarding the amount of parking that should be approved for a development and may use discretion to reduce the amount of parking provided on site if the reduction would not lead to a substantial parking deficit,[97] or significant impact. At times, the Planning Commission does not support the parking ratio proposed by a project sponsor and the ratio is substantially reduced. In some cases, particularly when the proposed project is in a transit-rich area, the Planning Commission does not support the provision of any off-street parking spaces. If the proposed project or project variant would substantially reduce its off-street parking, this would most likely not result in a substantial parking deficit for the various factors that affect travel behavior described above and the available parking in the vicinity. Even if substantial reduction would result in a substantial parking deficit, which is unlikely, any unmet parking demand associated with the proposed project or project would not result in hazardous conditions for traffic, transit, bicycles or pedestrians or in significant delays affecting transit, also because of the various factors that affect travel behavior.

[97] San Francisco Planning Department, California Environmental Quality Act: Vehicle Miles Traveled, Parking, For-Hire Vehicles, and Alternatives, February 23, 2017, http://commissions.sfplanning.org/cpcpackets/California%20Environmental%20Quality%20Act_Vehicle_Miles_Traveled_Parking_For-Hire_Vehicles_Alternatives.pdf, accessed May 25, 2018.

D. NOISE AND VIBRATION

This section describes the existing noise environment in the project area; evaluates the potential construction-related and operational noise and vibration impacts associated with implementation of the proposed project and project variant to adversely affect sensitive land uses; assesses the noise compatibility of proposed uses with the existing and future noise environment; and identifies mitigation measures to avoid or reduce potential adverse impacts.

The analysis is based on measurement of existing ambient noise conditions on the project site and in the project vicinity and review of applicable federal, state and local noise-related regulations and standards. Noise calculations were prepared to quantitatively assess the noise increases that would be attributable to the proposed project and project variant (see EIR Appendix E: Noise Measurement and Calculation Data); this information forms the basis of much of the assessment of noise impacts herein.

The noise impact methodologies and approaches to the analysis (described under "Approach to Analysis" on pp. 4.D.23-4.D.32) are based on an approximately seven-year construction duration and a four-phase construction program that would constitute maximum intensity of development on the site. Construction is estimated to start in 2020 and continue through 2027. (See Chapter 2, Project Description, pp. 2.91-2.96, for a detailed discussion of the four phases of the construction program.) The project sponsor may choose to develop the proposed project or project variant over a 15-year timeframe and may also develop the phases in a different order. For purposes of CEQA, the noise analysis under a seven-year timeframe and with the proposed phasing (including the phase overlaps) is the most conservative (or worst case) analysis because it assesses continuous construction over a shorter time period (i.e., more concentrated). Under a 15-year construction timeframe, the same development program would be implemented; however, periods of no construction or less intensive construction activity could occur between the four phases of the construction program, whereas under a 7-year timeframe there would be some overlap of construction phases, resulting in greater noise. Thus, the effects on ambient noise and future onsite and offsite sensitive land uses would be similar to those under a seven-year construction period, but less intensive. A different order for the construction phases may result in exposure of onsite and offsite sensitive receptors to construction noise at different time periods within the overall construction program and may also result in different exposure lengths for site occupancy/site construction overlaps with respect to onsite sensitive receptors. However, with no change to the portfolio of construction equipment and duration of daily use, phasing variations would not substantially change the magnitude or severity of any impact.

ENVIRONMENTAL SETTING

This subsection introduces the key concepts and terms that are used in the evaluation of noise and describes the existing noise environment of the project area.

SOUND FUNDAMENTALS

Noise is sometimes defined as unwanted sound, and the terms “noise” and “sound” are used more or less interchangeably in this analysis. The human ear responds to a very wide range of sound intensities. The decibel scale (dB) used to describe sound is a logarithmic rating system which accounts for the large differences in audible sound intensities. Using this scale, a change in noise level of 3 dBA is perceived as barely perceptible, 5 dBA is perceived as readily perceptible, and 10 dBA is perceived as a doubling or halving of noise loudness.[1] Therefore, a 70-dB sound level will sound about twice as loud as a 60-dB sound level. People generally cannot detect differences of 1 to 2 dB in a complex acoustical environment.

On this scale, a doubling of sound-generating activity (i.e., a doubling of the sound energy) causes a 3-dB increase in average sound produced by that source, not a doubling of the perceived loudness of the sound (which requires a 10-dB increase). For example, if traffic on a road is causing a 60-dB sound level at a nearby location, a doubling of the number of vehicles on this same road would cause the sound level at this same location to increase to 63 dB.

When addressing the effects of noise on people, it is necessary to consider the frequency response of the human ear, or those frequencies that people hear the best. Noise measuring instruments are therefore often designed to “weight” noises based on the way people hear. The frequency weighting most often used to evaluate environmental noise is “A weighting” because it best reflects how humans perceive noise. Measurements from instruments using this system, and associated noise levels, are reported in “A weighted decibels,” or dBA.

For any noise source, several factors affect the efficiency of noise transmission traveling from the source, which in turn affects the potential noise impact at offsite locations. Important factors include distance from the source, frequency of the noise, absorbency and roughness of the intervening ground (or water) surface, the presence or absence of obstructions and their absorbency or reflectivity, and the duration of the noise. Table 4.D.1: Representative Environmental Noise Levels presents typical noise levels of some familiar noise sources and activities.

[1] California Department of Transportation, Division of Environmental Analysis, Technical Noise Supplement to the Traffic Noise Analysis Protocol, September 2013, pp. 2-43 to 2-46 and Table 2-10, http://www.dot.ca.gov/hq/env/noise/pub/TeNS_Sept_2013B.pdf, accessed May 25, 2018.

Table 4.D.1: Representative Environmental Noise Levels

Common Outdoor Activities	Noise Level (dBA)	Common Indoor Activities
	110	Rock Band
Jet Fly-over at 100 feet		
	100	
Gas Lawnmower at 3 feet		
	90	
Diesel Truck going 50 mph at 50 feet		Food Blender at 3 feet
	80	Garbage Disposal at 3 feet
Noise Urban Area during Daytime		
Gas Lawnmower at 100 feet	70	Vacuum Cleaner at 10 feet
Commercial Area		Normal Speech at 3 feet
Heavy Traffic at 300 feet	60	
		Large Business Office
Quiet Urban Area during Daytime	50	Dishwasher in Next Room
Quiet Urban Area during Nighttime	40	Theater, Large Conference Room (background)
Quiet Suburban Area during Nighttime		
	30	Library
Quiet Rural Area during Nighttime		Bedroom at Night, Concert Hall (background)
	20	
		Broadcast/Recording Studio
	10	
	0	

Source: California Department of Transportation, Technical Noise Supplement to the Traffic Noise Analysis Protocol, September 2013, p. 2-20

Although a measured A-weighted noise level will adequately indicate the level of environmental noise at any instant in time, noise levels in populated communities typically vary by time. Several noise descriptors have been developed to characterize community noise by the total acoustical energy content of the noise over defined periods of time or by characterizing the loudest noise levels over a given time interval. Noise metrics used in this analysis are as follows:

L_{eq}: The equivalent sound level is the sound level corresponding to a steady-state sound level containing the same total energy as a time-varying signal over a given sample period. An L_{eq} is a single number representing the level of a constant sound containing the same amount of sound energy as the varying sound levels over a specific period. Thus, the L_{eq} is the "energy average" noise level for the measurement time interval.

L_{dn}: A 24-hour sound level metric similar to a 24-hour L_{eq}, except the L_{dn} includes an additional 10 dBA added to sound levels in each hour between 10 p.m. and 7 a.m. to account for increased sensitivity to noise during times when people are typically trying to sleep.

L_{90}: The sound level exceeded 90 percent of a specified time interval, often one hour. The L_{90} may be used as a conservative representation of ambient sound levels.

L_{max}: The instantaneous maximum noise level measured during a defined time interval.

EFFECTS OF NOISE ON PEOPLE

The effects of noise on people can be placed into the following categories:

- Interference with activities such as speech, sleep, and learning – The thresholds for speech interference indoors are about 45 dBA if the noise is steady and above 55 dBA if the noise is fluctuating.[2] Outdoors, the thresholds for speech interference are higher, generally by about 15 dBA, or 70 dBA. Interior residential standards for multifamily dwellings are set by the state at 45 dB L_{dn}.[3] The state standard is designed for sleep and speech protection and the same criterion is applied to all residential uses. According to the World Health Organization, sleep disturbance can occur when continuous indoor noise levels exceed 30 dBA (L_{eq}) or when intermittent interior noise levels reach or exceed 45 dBA (L_{max}), particularly if background noise is low. With a bedroom window slightly open (a reduction from outside to inside of 15 dB), the World Health Organization criteria would suggest exterior continuous (ambient) nighttime noise levels should be 45 dBA (L_{eq}) or below, and short-term events should not generate noise in excess of 60 dBA (L_{max}). The organization also notes that maintaining noise levels within the recommended levels during the first part of the night is believed to be effective for the ability to fall asleep. Exposure to noise levels greater than 85 dBA for 8 hours or longer can cause permanent hearing damage.[4]
- Subjective effects of annoyance, nuisance, and dissatisfaction[5] – The main causes for annoyance are interference with speech, radio and television, and house vibrations. The L_{dn} as a measure has been found to provide a valid correlation of noise level and the percentage of people annoyed. Three aspects of community noise are most important in determining subjective response: the level of sound, the frequency composition or spectrum of the sound, and the variation of sound level with time.[6]

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[2] World Health Organization, Guidelines for Community Noise, Chapter 3, p. 46, April 1999, http://apps.who.int/iris/bitstream/10665/66217/1/a68672.pdf, accessed May 25, 2018.

[3] Code of Federal Regulations, Title 24: Housing and Urban Development, Part 51, Environmental Criteria and Standards, Subpart B—Noise Abatement and Control, Section 51.101(a)(9).

[4] World Health Organization, Guidelines for Community Noise, Chapter 3, pp. 42-46, April 1999, http://apps.who.int/iris/bitstream/10665/66217/1/a68672.pdf, accessed May 25, 2018.

[5] Annoyance, nuisance, and dissatisfaction are not environmental impacts under CEQA unless it interferes with sleep.

[6] World Health Organization, Guidelines for Community Noise, Chapter 3, p. 56, April 1999, http://apps.who.int/iris/bitstream/10665/66217/1/a68672.pdf, accessed May 25, 2018.

- Physiological effects – Physiological effects include interference with sleep and rest, as well as hypertension and heart disease (after many years of constant exposure, often by workers, to high noise levels).[7]
- Hearing loss – Hearing loss occurs mainly due to chronic exposure to excessive noise, but may be due to a single event such as an explosion. Natural hearing loss associated with aging may also be accelerated from chronic exposure to loud noise.[8]

FUNDAMENTALS OF GROUNDBORNE VIBRATION

Equipment that creates blows or impacts on the ground surface produces vibrational waves, called groundborne vibration, that radiate along the surface of the earth and downward into the earth, potentially resulting in effects that range from annoyance to structural damage. As vibrations travel outward from the source, they excite the particles of rock and soil through which they pass and cause them to oscillate by a few ten-thousandths to a few thousandths of an inch. Differences in subsurface geologic conditions and distance from the source of vibration will result in different vibration levels characterized by different frequencies and intensities. Vibration levels decrease with increasing distance. The maximum rate or velocity of particle movement is the commonly accepted descriptor of the vibration "strength." This is referred to as the peak particle velocity (PPV) and is typically measured in inches per second.

Vibration energy spreads out as it travels through the ground, causing the vibration level to diminish with distance away from the source. High-frequency vibrations reduce much more rapidly than low frequencies, so that low frequencies tend to dominate the spectrum as distance from the source increases. Discontinuities in the soil strata can also cause diffractions or channeling effects that affect the propagation of vibration over long distances. When vibration encounters a building, the transfer of vibration from ground to the building foundation (referred to as "ground-to-foundation coupling") will usually reduce the overall vibration level; however, under certain circumstances, the ground-to-foundation coupling may also amplify the vibration level due to structural resonances of the floors and walls. High levels of vibration can damage fragile buildings or interfere with the operation of sensitive equipment. Depending on the age of the structure and type of vibration (transient, continuous, or frequent intermittent sources), vibration levels as low as 0.5 to 2.0 in/sec PPV can damage a structure.

Human response to vibration is difficult to quantify. Vibration can be felt or heard well below a level that would result in damage to a structure. Except for long-term occupational exposure, vibration levels rarely affect human health. Instead, most people consider vibration to be an annoyance that can affect concentration or disturb sleep. People may tolerate infrequent, short-

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[7] World Health Organization, Guidelines for Community Noise, Chapter 3, pp. 47-48, April 1999, http://apps.who.int/iris/bitstream/10665/66217/1/a68672.pdf, accessed May 25, 2018.

[8] World Health Organization, Guidelines for Community Noise, Chapter 3, pp. 39-42, April 1999, http://apps.who.int/iris/bitstream/10665/66217/1/a68672.pdf, accessed May 25, 2018.

duration vibration levels, but human annoyance to vibration becomes more pronounced if the vibration is continuous or occurs frequently. Human response to vibration often is described as the root-mean-square velocity level and is denoted in the decibel scale, or VdB. The typical background level in residential areas is about 50 VdB, and most people cannot detect levels below about 65 VdB, and generally do not consider levels below 70 VdB, or approximately 0.1 PPV, to be an annoyance.[9] However, the duration of a vibration event has an effect on human response, as does its frequency. Generally, as the duration of a vibration event increases, the potential for adverse human response increases, particularly if the vibration event disturbs sleep. In addition, while people have varying sensitivities to vibrations at different frequencies, in general they are most sensitive to low-frequency vibration.

Vibration in buildings caused by construction activities may be perceived as motion of building surfaces or rattling of windows, items on shelves, and pictures hanging on walls. Vibration of building components can also take the form of an audible low-frequency rumbling noise, which is referred to as groundborne noise. Groundborne noise is usually only a problem when the originating vibration spectrum is dominated by frequencies in the upper end of the range of vibration frequencies (i.e., 60 to 200 Hertz); when the structure and the construction activity are connected by foundations or utilities, such as sewer and water pipes; or when the airborne noise path is blocked, such as during tunneling activities.

EXISTING CONDITIONS

Noise

The project site is located in a mixed-use urban neighborhood. The existing noise environment is dominated by traffic noise along several area roadways, including California Street, Presidio Avenue, Euclid Avenue, and Masonic Avenue. Other sources of noise include occasional sirens and horns from vehicles exiting San Francisco Fire Station No. 10, located across from the project site on the east side of Masonic Avenue between Pine and Bush streets with frontage on Presidio Avenue, and miscellaneous neighborhood noises typical of an active urban area, such as voices and occasional car horns.

The San Francisco Planning Department has published a map of background noise levels over the entire city.[10] The map, dated 2009, identifies ambient L_{dn} noise levels, and includes the following sound level ranges: 50 dBA – 55 dBA, 55 dBA – 60 dBA, 60 dBA – 65 dBA, 65 dBA – 70 dBA,

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9 Federal Transit Administration, *Transit Noise and Vibration Impact Assessment*, May 2006, https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/FTA_Noise_and_Vibration_Manual.pdf, accessed August 7, 2018.

10 San Francisco Planning Department, Map 1: Background Noise Levels – 2009, 2009, http://generalplan.sfplanning.org/images/I6.environmental/ENV_Map1_Background_Noise%20Levels.pdf, accessed May 25, 2018.

and above 70 dBA. Along major roadways in the vicinity of the project site, the map shows existing noise levels as ranging from above 70 dBA L_{dn} immediately adjacent to major roadways such as California Street and Presidio Avenue, to 65 dBA – 70 dBA along Euclid Avenue and Laurel Street. This map is intended to provide an overview of approximate existing noise levels throughout the city and is suitable to define general ambient noise conditions.

To document existing noise levels on and near the project site, existing ambient sound level measurements were taken at multiple locations on and around the project site. Sound level measurements include a total of four long-term measurements (i.e., at least 48 hours in duration) and seven short-term measurements (i.e., approximately 15 minutes in duration).[11] Figure 4.D.1: Sound Level Measurements Locations shows the locations of both the long-term and short-term sound level measurements. A description of the existing noise environment's primary contributing noise sources, as documented during long-term and short-term sound level measurements, is provided in Table 4.D.2: Summary of Long-Term (LT) Noise Monitoring Results in the Project Vicinity (p. 4.D.9) and Table 4.D.3: Summary of Short-Term (ST) Noise Monitoring Results in the Project Vicinity (dBA) (p. 4.D.10).

Long-term measurement locations are representative of existing offsite and future onsite noise-sensitive receiving locations that may be affected by construction or onsite operations of the proposed project or project variant. The measurement locations were selected because they are most representative of the ambient noise environments around all sides of the project site. As indicated, the primary noise source in the project vicinity, and at each measurement location, was traffic on local and distant roadways. A summary of the long-term noise measurement data is presented in Table 4.D.2, p. 4.D.9 (see Tables NO-1 through NO-3 in EIR Appendix E for detailed information).

Short-term measurements were taken near noise-sensitive receiving locations such as homes, parks, or schools. The measured sound levels at each short-term measurement location are identified in Table 4.D.3, p. 4.D.10.

[11] Long-term and short-term sound level measurements were made using Larson Davis Model LxT ANSI S-1.4 Type I sound level meters, with microphones placed in acoustically-neutral wind screens positioned approximately five feet above relative ground height. The meters were factory calibrated within the previous 12 months and were field calibrated immediately prior to use.

SOURCE: Ramboll

3333 CALIFORNIA STREET MIXED-USE PROJECT

2015-014028ENV

FIGURE 4.D.1: SOUND LEVEL MEASUREMENT LOCATIONS

Table 4.D.2: Summary of Long-Term (LT) Noise Monitoring Results in the Project Vicinity

Measurement Location		Time Period	Average L_{dn} (dBA)	Primary Noise Sources
LT-1:	41-43 Lupine Avenue Meter located in yard facing Euclid Avenue, approximately 60 feet south of centerline of Euclid Avenue	Wednesday 10/18/17	59 dBA (L_{dn})	Traffic on Euclid Avenue, traffic on distant roadways
		Thursday 10/19/17	60 dBA (L_{dn})	
		Friday 10/20/17	60 dBA (L_{dn})	
		Saturday 10/21/17	60 dBA (L_{dn})	
		Sunday 10/22/17	58 dBA (L_{dn})	
		Average:	**60 dBA (L_{dn})**	
LT-2:	3333 California Street, UCSF Laurel Heights Campus North of West Entrance on Laurel Street, approximately 60 feet west of centerline of Laurel Street	Tuesday 10/10/17	62 dBA (L_{dn})	Traffic on Laurel Street, traffic on distance roadways, activity within UCSF Laurel Heights Campus
		Wednesday 10/10/17	62 dBA (L_{dn})	
		Thursday 10/12/17	59 dBA (L_{dn})	
		Average:	**61 dBA (L_{dn})**	
LT-3	3333 California Street, UCSF Laurel Heights Campus West of North Entrance on Laurel Street, approximately 50 feet south of centerline of California Street	Tuesday 10/10/17	68 dBA (L_{dn})	Traffic on California Street, traffic entering/existing UCSF Laurel Heights Campus, distant traffic, miscellaneous neighborhood activity
		Wednesday 10/11/17	68 dBA (L_{dn})	
		Thursday 10/12/17	67 dBA (L_{dn})	
		Average:	**68 dBA (L_{dn})**	
LT-4	At north end of property of SFFD Station #10, approximately 85 feet west of centerline of Presidio Avenue and 45 feet east of centerline of Masonic Avenue	Friday 10/13/17	68 dBA (L_{dn})	Traffic on Presidio Avenue, traffic on Masonic Avenue, traffic on distant roadways including Euclid Avenue, fire engines and sirens (when present), miscellaneous neighborhood activity
		Saturday 10/14/17	68 dBA (L_{dn})	
		Sunday 10/15/17	67 dBA (L_{dn})	
		Monday 10/16/17	66 dBA (L_{dn})	
		Average:	**67 dBA (L_{dn})**	

Note: Observations of primary noise sources were noted by field staff during equipment setup, periodic checks, and retrieval. Hourly measurement data are available in EIR Appendix E, Tables NO-1 through NO-3. See Figure 4.D.1, p. 4.D.8, for measurement locations.

Source: Ramboll, 2018

Table 4.D.3: Summary of Short-Term (ST) Noise Monitoring Results in the Project Vicinity (dBA)

Measurement Location		Time Period	Average L_{eq}	Primary Noise Sources
ST-1	Near intersection of Geary Boulevard and Masonic Avenue	Thursday 10/12/17 6:28 p.m., 15 min	70 dBA (L_{eq})	Traffic, children's voices
ST-2	Clay Street, between Walnut and Laurel streets	Thursday 10/12/17 5:27 p.m., 15 min	54 dBA (L_{eq})	Near play area, mostly voices, birds
ST-3	Near ball field SW corner of Euclid Avenue and Collins Street	Thursday 10/12/17 5:55 p.m., 15 min	55 dBA (L_{eq})	Traffic on Euclid Avenue, voices
ST-4	Bush Street, between Broderick and Baker streets	Thursday 10/12/17 4:30 p.m., 15 min	59 dBA (L_{eq})	Traffic on Bush Street, birds
ST-5	California Street, near intersection with Divisadero Street	Thursday 10/12/17 3:54 p.m., 15 min	63 dBA (L_{eq})	Traffic, children's voices
ST-6	Pine Street, between Baker and Lyon streets	Thursday 10/12/17 4:58 p.m., 15 min	71 dBA (L_{eq})	Traffic on Pine Street, mostly from light at Baker Street
ST-7	Masonic Avenue, near yard of 71 Lupine Avenue	Saturday 11/2/17 5:59 p.m., 15 min	72 dBA (L_{eq})	Traffic on Masonic Avenue

Note: Observations of primary noise sources were noted by field staff during measurements. See Figure 4.D.1, p. 4.D.8, for measurement locations.

Source: Ramboll, 2018

Vibration

There are no known sources of existing groundborne vibration in the vicinity of the project site. Heavy truck, bus, and fire engine traffic along area roadways generates airborne noise and surface vibration. However, the levels of vibration from these sources are considered negligible and typical of vibration levels generated along heavily used urban roadways.

EXISTING NOISE-SENSITIVE LAND USES

Human response to noise varies considerably from one individual to another. Effects of noise at various levels can include interference with sleep, concentration, and communication; physiological and psychological stress; and, at high levels of noise, hearing loss. Given these effects, some land uses are considered more sensitive to ambient noise levels than others.

Land uses are considered noise "sensitive receptors" where low noise levels are necessary to preserve their intended goals such as relaxation, education, health, and general state of well-being. Residential uses are considered most sensitive to noise because people spend extended periods of time and sleep at home. Other noise-sensitive receptors typically include hotels/motels, houses of worship, schools, libraries, hospitals, and daycare facilities.

The project site currently includes administrative, academic research, social and behavioral science departments, and onsite daycare uses associated with the University of California. These uses are located in the office building at the center of the site. All uses, including the daycare use, would be removed prior to the first phase of the construction program (Phase 1 [Masonic and Euclid buildings]), which would include the demolition of portions of the existing office building.

Numerous existing residences surround the site along California Street, Presidio Avenue, Euclid Avenue, and Laurel Street. Although most nearby and adjacent sensitive receptors are residences, there are also several schools/daycare centers within 1,000 feet of the project site, including Laurel Hill Nursery School, San Francisco University High School - South Campus, Little School, Helen Diller Preschool at the Jewish Community Center of San Francisco, and the Chibi Chan Preschool at the Booker T. Washington Community Center. The California Pacific Medical Center at 3700 California Street is the only in-patient care medical facility located within approximately 1,320 feet of the project site.[12] (See Figure 4.E.2 in Section 4.E, Air Quality, p. 4.E.30, for a graphical summary of all sensitive receptors in an approximately quarter-mile radius of the project site.) The California Pacific Medical Center was included as a noise-sensitive receptor, although noise levels at the medical center from project construction would be far less than levels anticipated at receptors much closer to the project site. Operational noise increases from project-related traffic along California Street at that location would be similar to what is experienced at receptors along the north side of California Street between Laurel Street and Presidio Avenue that were evaluated for this assessment.

Noise-sensitive land uses in the immediate vicinity of the project site include residential uses, a daycare center, and a hotel along the north side of California Street (multi-family residential buildings [including senior housing], the Jewish Community Center of San Francisco/Helen Diller Preschool, and the Laurel Inn [444 Presidio Avenue]); and residential uses along the east side of Presidio Avenue, the south side of Euclid Avenue, and the west side of Laurel Street (see Table 4.D.4: Sensitive Receptors in the Project Vicinity, and Figure 4.D.2: Representative Offsite Receptor Locations). These receptors range in distance to the nearest portion of the site from 60 to 240 feet.

[12] Massehian, Vahram, Sutter Health, e-mail correspondence with Don Lewis, Senior Environmental Planner, San Francisco Planning Department, January 12, 2018. Sutter Health is expected to vacate the California Pacific Medical Center campus and move to a new location at the end of 2019/beginning of 2020. Redevelopment of the site is expected to include residential uses.

Table 4.D.4: Sensitive Receptors in the Project Vicinity

Receptor ID	Type of Sensitive Receptor	Location	Minimum Approximate Distance from Site NOTES A, B, C
EXISTING SENSITIVE RECEPTORS			
R1	Residential	Euclid Avenue between Laurel Street and Masonic Avenue, south of site	80 feet
R2	Residential	Euclid Avenue between Laurel Street and Masonic Avenue, south of site	85 feet
R3	Residential	Laurel Street between Euclid Avenue and Mayfair Drive, west of site	70 feet
R4	Residential	Laurel Street between Euclid Avenue and Mayfair Drive, west of site	65 feet
R5	Residential	California Street between Walnut and Laurel streets, north of site	80 feet
R6	Community Center / Daycare Center	California Street between Walnut Street and Presidio Avenue, north of site	60 feet
R7	Hotel	California Street between Presidio Avenue and Lyon Street, northeast of site	240 feet
R8	Residential	Presidio Avenue between California Street and Masonic Avenue, east of site	70 feet

Notes:

[A] Minimum distance from receptor to nearest location of project site boundary.

[B] Measured using a geographic information system software, including locations of building footprints, to calculate the nearest distance between objects (receptors, buildings, etc.). Receptor locations, proposed buildings, and project construction boundaries were approximated based on existing aerial imagery and construction phasing drawings provided by the Prado Group and Webcor Builders. Receptors were selected to represent the variation in noise levels around the project site due to project construction and operation.

[C] Representative of the distance, rounded to the nearest 5 feet, between the receptors and project construction boundaries as illustrated in Figure 4.D.2, p. 4.D.13.

Source: Ramboll, 2018

SOURCE: Ramboll

3333 CALIFORNIA STREET MIXED-USE PROJECT

2015-014028ENV

FIGURE 4.D.2: REPRESENTATIVE OFFSITE RECEPTOR LOCATIONS

REGULATORY FRAMEWORK

FEDERAL REGULATIONS

U.S. Environmental Protection Agency

In 1972, the Noise Control Act (42 United States Code [U.S.C.] section 4901 et seq.) was passed by Congress to promote noise environments in support of public health and welfare. It also established the U.S. Environmental Protection Agency Office of Noise Abatement and Control to coordinate federal noise control activities. The agency established guidelines for noise levels that would be considered safe for community exposure without the risk of adverse health or welfare effects. The agency found that to prevent hearing loss over the lifetime of a receptor, the yearly average L_{eq} should not exceed 70 dBA, and the L_{dn} should not exceed 55 dBA in outdoor activity areas or 45 dBA indoors to prevent interference and annoyance.[13] In 1982, the agency phased out the office's funding as part of a shift in federal noise control policy to transfer the primary responsibility of regulating noise to state and local governments.

Federal regulations establish noise limits for medium and heavy trucks (more than 4.5 tons, gross vehicle weight rating) under Title 40 of the Code of Federal Regulations, Part 205, Subpart B. The federal truck passby noise standard is 80 dBA at 50 feet from the vehicle pathway centerline, under specified test procedures. These requirements are implemented through regulatory controls on truck manufacturers.

U.S. Department of Housing and Urban Development

The U.S. Department of Housing and Urban Development has set guidelines for acceptable noise levels in residential areas that include a goal (not a standard) for interior noise levels not to exceed 45 dBA L_{dn}.[14] The guidelines for acceptable noise levels are specified in Code of Federal Regulations, Title 24, Part 51, and are as follows:[15]

- **Acceptable** – 65 dBA L_{dn} or less, all projects may be approved
- **Normally unacceptable** – Above 65 dBA L_{dn} but not exceeding 75 dBA L_{dn}, require mitigation measures and each project needs to be individually evaluated for approval or denial
- **Unacceptable** – Above 75 dBA L_{dn}, require mitigation measures and the approval of the Assistant Secretary for Community Planning and Development or Certifying Officer

[13] U.S. Environmental Protection Agency, Information on Levels of Environmental Noise Requisite to Protect Public Health and Welfare with an Adequate Margin of Safety, p. 3, March 1974.

[14] U.S. Department of Housing and Urban Development, The Noise Guidebook, p. 12, https://www.hudexchange.info/resource/313/hud-noise-guidebook/, accessed May 25, 2018.

[15] Code of Federal Regulations, Title 24: Housing and Urban Development, Part 51, Environmental Criteria and Standards, Subpart B—Noise Abatement and Control, Section 51.103(c).

U.S. Federal Transit Administration

The U.S. Federal Transit Administration (Federal Transit Administration) has established general methodology guidelines and impact criteria for assessment of noise from construction activities in its document, Transit Noise and Vibration Impact Assessment. Guidelines are provided for both general assessment and detailed assessments of construction noise.[16]

The general assessment of construction noise impacts includes the following major elements:

- Predictions of construction noise are based on the two noisiest pieces of equipment expected to be used during each phase of the four-phase construction program.
- Equipment is assumed to operate at full power for an hour or more.
- Construction equipment is assumed to operate in the center of the construction site.
- Construction noise levels are to be calculated as hourly $L_{eqs.}$

When using the above method to estimate construction sound levels, the Federal Transit Administration provides guidelines for assessing the potential for adverse community reaction. In general, no substantial adverse reaction would be expected if the calculated hourly L_{eq} were to remain at or below 90 dBA at residential receptors during daytime hours and 80 dBA at night.

STATE REGULATIONS

California Government Code section 65302 encourages each local government entity to implement a noise element as part of its general plan.[17] In addition, the California Governor's Office of Planning and Research has developed guidelines for preparing noise elements, which include recommendations for evaluating the compatibility of various land uses as a function of community noise exposure. The City and County of San Francisco has developed guidelines that are described below starting on p. 4.D.17.

California Noise Insulation Standards

Title 24, Part 2, section 1207 of the California Code of Regulations contains requirements for the construction of new hotels, motels, apartment houses, and dwellings other than detached single-family dwellings, intended to limit the extent of noise transmitted into habitable spaces from exterior noise sources. Section 1207 states that walls, partitions, and floor/ceiling assemblies must have a sound transmission class of at least 50, meaning that partitions can reduce sound by

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[16] Federal Transit Administration, *Transit Noise and Vibration Impact Assessment*, pp. 12-1 – 12-9, May 2006, https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/FTA_Noise_and_Vibration_Manual.pdf, accessed May 25, 2018.

[17] California Government Code, Title 7, Division 1, Chapter 3, Section 65302(f)(1), June 27, 2017, https://leginfo.legislature.ca.gov/faces/codes_displayText.xhtml?lawCode=GOV&division=1.&title=7.&part=&chapter=3.&article=5, accessed May 25, 2018.

50 dB.[18] Section 1207.4 sets forth an interior standard of 45 dBA L_{dn} or CNEL (whichever descriptor is consistent with the local noise element) in any habitable room with all doors and windows closed.[19] These requirements are collectively known as the California Noise Insulation Standards.

California Department of Transportation

The California Department of Transportation (Caltrans) has published several documents characterizing assessment procedures and impact criteria related to traffic noise and groundborne vibration. Caltrans published the Technical Noise Supplement to the Traffic Noise Analysis Protocol in September 2013, which describes the measurement, modeling, and noise impact assessment procedures for evaluating noise from traffic. The document states the following, "Changes in noise levels are perceived as follows: 3 dBA as barely perceptible, 5 dBA as readily perceptible, and 10 dBA as a doubling or halving of noise."[20]

Caltrans has also provided guidance on the evaluation and impact criteria related to groundborne vibration, as documented in the Transportation and Construction Vibration Guidance Manual.[21] Table 4.D.5: Vibration Guidelines for Annoyance summarizes the Caltrans manual guidelines to assess the potential for annoyance, which can range from barely perceptible to severe, based on vibration PPV levels, with the potential for annoyance based on whether the vibration is transient (i.e., single, isolated vibration events, such as blasting or a dropped ball) or continuous or frequent (i.e., sources such as impact pile drivers, pogo-stick compactors, crack-and-seat equipment, vibratory pile drivers, and vibratory compaction equipment). Table 4.D.6: Vibration Guidelines for Potential Damage to Structures summarizes the Caltrans manual guidelines to assess the potential for damage to structures, based on vibration PPV levels, with the potential for damage based on building types (i.e., the fragility or strength of a building structure) and whether the vibration is transient or continuous or frequent.

[18] California Building Code section 1207.2, 2016, https://up.codes/viewer/california/ca-building-code-2016-v1/chapter/12/interior-environment#1207, accessed September 24, 2018.
[19] California Building Code section 1207.4, 2016, https://up.codes/viewer/california/ca-building-code-2016-v1/chapter/12/interior-environment#1207, accessed September 24, 2018.
[20] California Department of Transportation, Division of Environmental Analysis, *Technical Noise Supplement to the Traffic Noise Analysis Protocol*, September 2013, p. 6-5, http://www.dot.ca.gov/hq/env/noise/pub/TeNS_Sept_2013B.pdf, accessed May 25, 2018.
[21] California Department of Transportation, *Transportation and Construction Vibration Manual*, p. 38, September 2013, http://www.dot.ca.gov/hq/env/noise/pub/TCVGM_Sep13_FINAL.pdf, accessed May 25, 2018.

Table 4.D.5: Vibration Guidelines for Annoyance

Human Response	Maximum Peak Particle Velocity (in/sec, PPV)	
	Transient Sources [NOTE A]	Continuous/Frequent Intermittent Sources [NOTE B]
Barely perceptible	0.04	0.01
Distinctly perceptible	0.25	0.04
Strongly perceptible	0.90	0.10
Severe	2.00	0.10

Notes: in/sec = inches per second; PPV = peak particle velocity
[A] Transient sources create a single, isolated vibration event, such as blasting or drop balls.
[B] Continuous/frequent intermittent sources include impact pile drivers, pogo-stick compactors, crack-and-seat equipment, vibratory pile drivers, and vibratory compaction equipment.

Source: Caltrans, Transportation and Construction Vibration Guidance Manual, September 2013, Table 20, p. 38

Table 4.D.6: Vibration Guidelines for Potential Damage to Structures

Structure Type and Condition	Maximum Peak Particle Velocity (in/sec, PPV)	
	Transient Sources	Continuous/Frequent Intermittent Sources
Extremely fragile historic buildings, ruins, ancient monuments	0.12	0.08
Fragile buildings	0.2	0.1
Historic and some old buildings	0.5	0.25
Older residential structures	0.5	0.3
New residential structures	1.0	0.5
Modern industrial/commercial buildings	2.0	0.5

Notes: Transient sources create a single, isolated vibration event, such as blasting or drop balls. Continuous/frequent intermittent sources include impact pile drivers, pogo-stick compactors, crack-and-seat equipment, vibratory pile drivers, and vibratory compaction equipment.

Source: Caltrans, Transportation and Construction Vibration Guidance Manual, September 2013, Table 19, p. 38

LOCAL REGULATIONS AND GUIDELINES

Article 29 of the San Francisco Police Code

Article 29 of the San Francisco Police Code, "San Francisco Police Code Article 29: Regulation of Noise Guidelines for Noise Control Ordinance Monitoring and Enforcement" (San Francisco noise ordinance, or the noise ordinance) contains noise limits that are specific to construction activities. Construction of the proposed project or project variant would be subject to the city's noise limits and requirements during all stages of construction:

- Section 2907(a) and (b): Construction equipment must not emit sound levels in excess of 80 dBA when measured at a distance of 100 feet from the equipment. Exemptions to this requirement include impact tools and equipment, provided that such impact tools and equipment have intake and exhaust mufflers recommended by the manufacturer, and that pavement breakers and jackhammers are equipped with acoustically attenuating shields or shrouds recommended by the manufacturer and approved by the Director of Public

Works or the Director of Building Inspection as best accomplishing maximum noise attenuation.

- Section 2908: Between the hours of 8 p.m. and 7 a.m., noise from construction activities (including erecting, constructing, demolishing, excavating for, altering or repairing) shall not exceed 5 dBA over ambient levels at the nearest property plane unless a work permit has been applied for and granted by the Director of Public Works or the Director of Building Inspection.[22]

Article 29 also contains noise limits that are protective of noise-sensitive areas exposed to continuous noise from sources other than construction activity or from an exempt source (e.g., equipment used during emergencies).[23] Operation of the proposed project or project variant would be subject to the following city noise limits:

- Section 2901: The ambient noise level is defined as "the lowest sound level repeating itself during a minimum ten-minute period as measured with a type 1 precision sound level meter, using slow response and 'A' weighting." In most cases, the level of noise exceeded 90 percent of the time (the L_{90}) is a conservative representation of the ambient noise level. In no case shall the ambient noise level be considered to be less than 35 dBA for interior residential locations and 45 dBA in all other locations.
- Section 2904: Noise from waste disposal services, including from garbage trucks, shall be limited to a sound level of 75 dBA at a distance of 50 feet. This limit does not apply to crushing, impacting, dropping, or moving garbage on the truck, but only to the truck's mechanical processing system.
- Section 2909(a): Noise from residential uses shall not exceed a level of more than five dBA above the existing ambient noise levels at any point outside the property plane.
- Section 2909(b): Noise from operation of commercial uses shall not exceed existing ambient noise levels at any point outside of the property plane by more than 8 dBA.
- Section 2909(c): Noise generated from a source located on public property, such as a park or plaza, shall not exceed existing ambient noise levels by more than 10 dBA at locations greater than 25 feet from the source.
- Section 2909(d): To prevent sleep disturbance and protect public health, no fixed noise source may cause the noise level measured inside any sleeping or living room in any dwelling unit to exceed 45 dBA between the hours of 10 p.m. to 7 a.m. or 55 dBA between the hours of 7 a.m. to 10 p.m.

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22 Nighttime construction work is not proposed for the proposed project or project variant.

23 City of San Francisco, San Francisco Police Code Article 29: Regulation of Noise Guidelines for Noise Control Ordinance Monitoring and Enforcement, December 2014, https://www.sfdph.org/dph/files/EHSdocs/ehsNoise/GuidelinesNoiseEnforcement.pdf, accessed May 25, 2018.

San Francisco General Plan

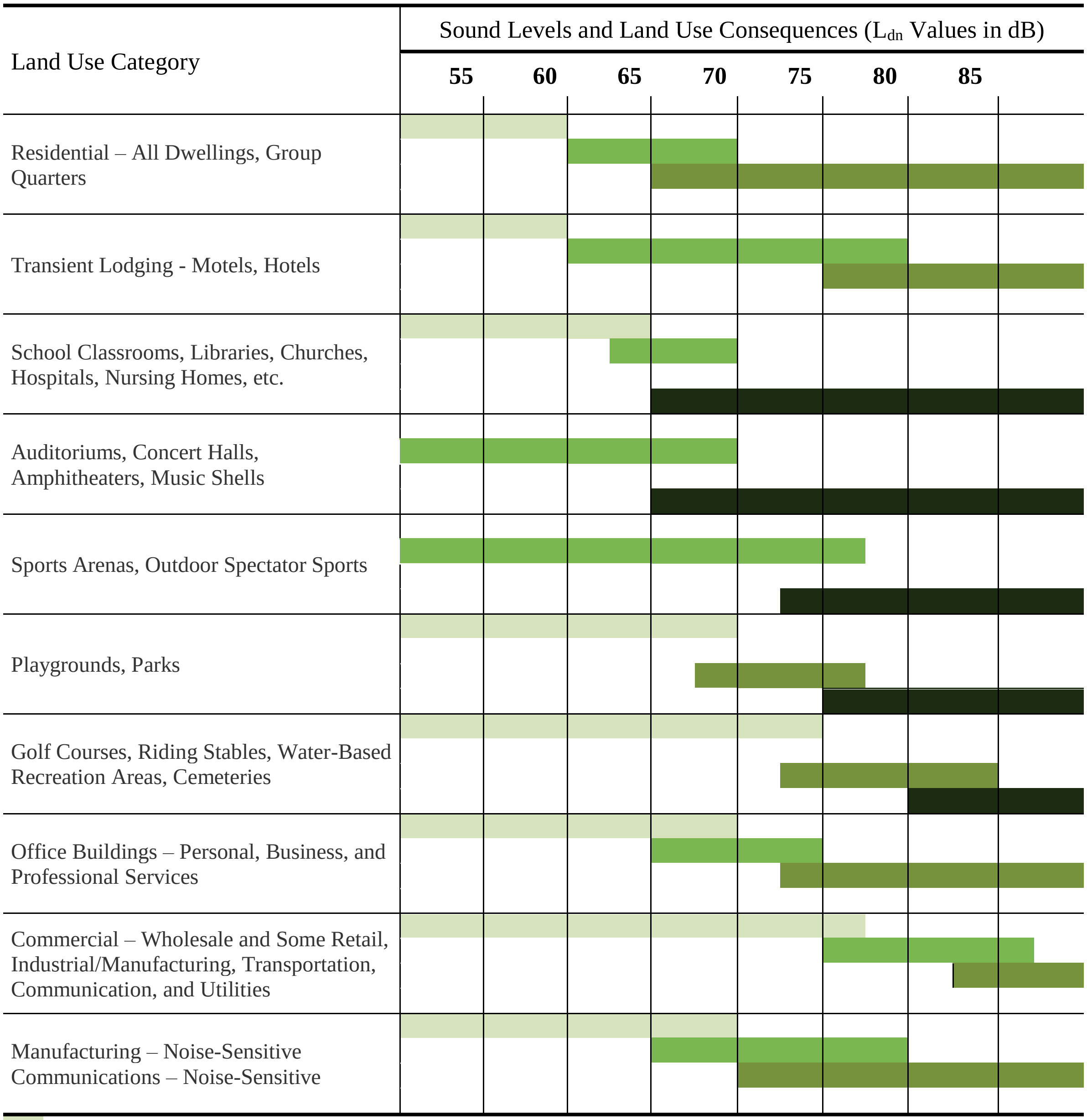
Environmental Protection Element

The San Francisco General Plan (general plan) contains policies for avoiding or mitigating transportation noise and includes guidelines for determining the compatibility of land uses with noise levels. Policy 11.1 of the Environmental Protection Element of the general plan (described below) includes a land use compatibility chart for community noise exposure. The chart provides guidelines for the compatibility of various development types with a given noise environment. The city's land use compatibility chart is presented in Table 4.D.7: San Francisco Land Use Compatibility Chart for Community Noise. According to these guidelines, the maximum "satisfactory, with no special insulation requirements" exterior noise level for residential land uses (including transient lodging such as hotels) is approximately 60 dBA L_{dn}. For office and most commercial land uses, the maximum "satisfactory, with no special insulation requirement," noise level is 70 dBA L_{dn}. If such uses are to be located in areas where noise levels exceed these guidelines, a detailed analysis of noise reduction requirements should be done, with noise insulation features included in the design. As within most large municipalities, the principal source of ambient noise is traffic. Traffic noise along city streets and highways often contributes the highest levels of ambient noise, and, as a result, it is the noise source most often reviewed when assessing project suitability. The following general plan Environmental Protection Element objectives and policies pertain to reducing noise impacts on land uses.[24]

- Objective 9: Reduce transportation-related noise. Much can be done to reduce noise at the source. Technological means are available for reducing vehicular noise emissions well below present levels.
  - Policy 9.2: Impose traffic restrictions to reduce transportation noise. Transportation noise levels vary according to the predominance of vehicle type, traffic volume, and traffic speed. Curtailing any of these variables ordinarily produces a drop in noise level. In addition to setting the speed limit, the City has the authority to restrict traffic on city streets, and it has done so on a number of streets. In addition, certain movement restraints can be applied to slow down traffic or divert it to other streets. These measures should be employed where appropriate to reduce noise.
  - Policy 9.6: Discourage changes in streets which will result in greater traffic noise in noise-sensitive areas. Widening streets for additional traffic lanes or converting streets to one-way direction can induce higher traffic volume and faster speeds. Other techniques such as tow-away lanes and traffic light synchronization also facilitate heavier traffic flows. Such changes should not be undertaken on residential streets if they will produce an excessive rise in the noise level of those streets.

[24] *San Francisco General Plan*, Environmental Protection Element, http://generalplan.sfplanning.org/I6_Environmental_Protection.htm, accessed May 25, 2018.

Table 4.D.7: San Francisco Land Use Compatibility Chart for Community Noise



Satisfactory, with no special noise insulation requirements. Noise levels in this range are considered "**Acceptable**."

New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Noise levels in this range are considered "**Conditionally Acceptable**."

New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design. Noise levels in this range are considered "**Conditionally Unacceptable**."

New construction or development should generally not be undertaken. Noise levels in this range are considered "**Unacceptable**."

- Objective 10: Minimize the impact of noise on affected areas. The process of blocking excessive noise from our ears could involve extensive capital investment if undertaken on a systematic, citywide scale. Selective efforts, however, especially for new construction, are both desirable and justified.
  - Policy 10.1: Promote site planning, building orientation and design, and interior layout that will lessen noise intrusion. Because sound levels drop as distance from the source increases, building setbacks can play an important role in reducing noise for the building occupants. (Of course, if provision of the setback eliminates liveable rear yard space, the value of the setback must be weighed against the loss of the rear yard.) Buildings sited with their narrower dimensions facing the noise source and sited to shield or be shielded by other buildings also help reduce noise intrusion. Although walls with no windows or small windows cut down on noise from exterior sources, in most cases it would not be feasible or desirable to eliminate wall openings. However, interior layout can achieve similar results by locating rooms whose use require more quiet, such as bedrooms, away from the street noise. In its role of reviewing project plans and informally offering professional advice on site development, the Department of City Planning can suggest ways to help protect the occupants from outside noise, consistent with the nature of the project and size and shape of the building site.
  - Policy 10.2: Promote the incorporation of noise insulation materials in new construction. State-imposed noise insulation standards apply to all new residential structures except detached single-family dwellings. Protection against exterior noise and noise within a building is also important in many non-residential structures. Builders should be encouraged to take into account prevailing noise levels and to include noise insulation materials as needed to provide adequate insulation.
  - Policy 10.3: Construct physical barriers to reduce noise transmission from heavy traffic carriers. If designed properly, physical barriers such as walls and berms along transportation routes can in some instances effectively cut down on the noise that reaches the areas beyond. There are opportunities for a certain amount of barrier construction, especially along limited access thoroughfares and transit rights-of-way (such as BART), but it is unlikely that such barriers can be erected along existing arterial streets in the city. Barriers are least effective for those hillside areas above the noise source. Where feasible, appropriate noise barriers should be constructed.
- Objective 11: Promote land uses that are compatible with various transportation noise levels. Because transportation noise is going to remain a problem for many years to come, attention must be given to the activities close to the noise. In general, the most noise-sensitive activities or land uses should ideally be the farthest removed from the noisy transportation facilities. Conversely, those activities that are not seriously affected by high outside noise levels can be located near these facilities.
  - Policy 11.1: Discourage new uses in areas in which the noise level exceeds the noise compatibility guidelines for that use. New development should be examined to determine whether background and/or thoroughfare noise level of the site is consistent with the guidelines for the proposed use. If the noise levels for the development site, as shown on Map 1 (which should be revised periodically to keep

> them current)[25], exceed the sound level guidelines established for that use, as shown in the accompanying land use compatibility chart [see Table 4.D.7, p. 4.D.20], then either needed noise insulation features should be incorporated in the design or else the construction or development should not be undertaken. Since the sound levels shown on the maps are estimates based on both traffic data and on a sample of sound level readings, actual sound levels for the site, determined by accepted measurement techniques, may be substituted for them.

IMPACTS AND MITIGATION MEASURES

SIGNIFICANCE THRESHOLDS

The thresholds for determining the significance of impacts in this analysis are consistent with the environmental checklist in Appendix G of the State CEQA Guidelines, which has been modified by the San Francisco Planning Department. For the purpose of this analysis, the following applicable thresholds were used to determine whether implementing the proposed project or project variant would result in a significant noise or vibration impact. The proposed project or project variant would have a significant impact related to noise and vibration if it were to:

- Result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies;
- Result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels;
- Result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project;
- Result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project;
- Be located within an airport land use plan area, or, where such a plan has not been adopted, in an area within two miles of a public airport or public use airport, resulting in exposure to excessive noise levels for people residing or working in the area; or
- Be located within the vicinity of a private airstrip, resulting in the exposure to excessive noise levels for people residing or working in the project area.

The project site is not within an airport land use plan area, nor is it within 2 miles of a public airport or public use airport or in the vicinity of a private airstrip. Therefore, these criteria are not applicable, and are not discussed further in the impacts evaluation.

[25] San Francisco Planning Department, Map 1: Background Noise Levels – 2009, 2009, http://generalplan.sfplanning.org/images/I6.environmental/ENV_Map1_Background_Noise%20Levels.pdf, accessed May 25, 2018.

APPROACH TO ANALYSIS

Methodology for Analysis of Construction Noise

Implementation of the proposed project or project variant would include the use of heavy equipment on the project site for demolition of existing structures, construction of new structures, and rehabilitation of onsite structures that would be retained. This assessment includes the construction equipment identified by the project sponsor as that likely to be used during project construction (see Table 4.D.11: Preliminary Construction Equipment List by Activity, p. 4.D.34). Noise from construction activity typically varies depending on the type of equipment in use, how many pieces of equipment are operating at any one time, the proximity of equipment to a noise receptor location (i.e., mobile equipment can be moved around a construction site), and the duration of equipment use. In addition, some equipment, such as an excavator with a hoe ram or a jackhammer, may generate "impulsive noise emissions" (i.e., impact noise).

Construction activities would occur intermittently on the project site over the seven-year construction program and could expose noise-sensitive receptors to temporary increases in noise levels substantially exceeding ambient levels. Project construction would also result in temporary increases in truck traffic noise along haul routes for off-hauling excavated materials and delivering materials to the site. The assessment of construction noise was completed for both existing offsite noise-sensitive receptors, as well as future onsite noise-sensitive receptors. For future onsite receptors, the analysis included noise-sensitive receptors (residences, daycare) within buildings that would be constructed in each phase of the four-phase construction program and occupied during at least some construction activities (demolition, excavation, and placement of foundations for structures; fabrication of structures; and exterior and interior work) associated with the subsequent phases of the construction program. As noted, changes in the order of construction phases relative to what was evaluated for this assessment may result in exposure of sensitive receptors to construction noise at different time periods within the overall construction program, including with regards to overlapping construction phases. However, with no change to the portfolio of construction equipment and duration of daily use, phasing variations would not substantially change the magnitude or severity of any impact.

Because construction noise is inherently variable, qualitative factors (e.g., duration and frequency of the noise, proximity to sensitive receptors) were also taken into consideration in the construction analysis for the proposed project and project variant, as applicable. Therefore, the criteria listed above are not strictly thresholds to be used for CEQA purposes, but quantitative information that is considered in combination with other qualitative factors to determine the significance of project-generated noise.

CITY NOISE ORDINANCE

Section 2907(a) of the San Francisco noise ordinance limits non-impact construction equipment noise to 80 dBA at a distance of 100 feet from equipment, or an equivalent sound level at some other convenient distance (e.g., 50 feet from the source).[26] For this analysis, the noise limit was compared to the sound level of the loudest non-impact equipment assumed to operate at peak capacity over a full hour.[27] Noise emitted from operation of construction equipment was estimated based on construction equipment noise data published by the U.S. Federal Highway Administration and the Federal Transit Administration. The agencies' construction equipment sound levels assuming peak operation over a full hour are shown in Table 4.D.8: Representative Construction Equipment Noise Levels – Peak Hourly Use.

Table 4.D.8: Representative Construction Equipment Noise Levels – Peak Hourly Use

Equipment	Peak Hourly L_{eq} at 50 feet (dBA) [NOTE A]	Peak Hourly L_{eq} at 100 feet (dBA) [NOTE A]
Aerial Lifts	75	69
Air Compressors	78	72
Caisson Drill [NOTE B]	81	75
Crawler Tractors with Rippers	84	78
Excavators	81	75
Excavators with Hoe Ram (impact)	**90**	**84**
Forklifts	79	73
Pavers	77	71
Paving Equipment	77	71
Pumps	81	75
Rollers	80	74
Rough Terrain Forklifts	79	73
Skid Steer Loaders (Bobcat)	79	73
Sweepers/Scrubbers	82	76
Tractors/Loaders/Backhoes	84	78

Notes: **Boldface values** indicate an exceedance of the noise ordinance limit of 80 dBA at a distance of 100 feet.
[A] Based on highest anticipated noise level, assuming 100 percent use during any one-hour period.
[B] Caisson drill noise predominantly from excavator that operates the caisson drill equipment; noise emissions assumed identical to excavator for the purposes of this study.

Source: Federal Highway Administration Roadway Construction Noise Model, February 2006

[26] Equals 86 dBA at 50 feet, based on a 6-dB increase per halving of distance to "point" source of noise.
[27] As noted under "Article 29 of the San Francisco Police Code" on p. 4.17, section 2907(b) exempts impact tools and equipment provided that such impact tools and equipment have intake and exhaust mufflers recommended by the manufacturer, and that pavement breakers and jackhammers are equipped with acoustically attenuating shields or shrouds recommended by the manufacturer.

FEDERAL TRANSIT ADMINISTRATION GENERAL ASSESSMENT GUIDANCE

For comparison to the Federal Transit Administration's general assessment guidance criterion of 90 dBA during daytime hours for residential properties, the analysis assumes the following:

- Concurrent operation of the two noisiest pieces of equipment during each phase of the four-phase construction program, including both impact and non-impact equipment.
- Construction equipment operates at full power for at least a full hour, represented by the construction noise levels shown in Table 4.D.8.
- The noise descriptor used to define construction equipment noise levels is the hourly L_{eq} for consideration of short-term construction noise.
- Construction noise attenuates at a rate of 6 dBA for every doubling of distance from the source.
- No consideration is applied for other attenuation factors such as intervening structures, ground types, and atmospheric attenuation.

For the purposes of evaluating noise from construction activities, construction equipment is presumed to operate at a central location within each building footprint as proposed new buildings are constructed during each phase of the four-phase construction program. Construction activities would include demolition, excavation, and placement of foundations for structures; fabrication of structures; and exterior and interior work. Demolition and construction activities would require the use of heavy trucks, excavators, material loaders, cranes, and other mobile and stationary construction equipment (see Table 4.D.11, p. 4.D.34).

The analysis of construction noise under the Federal Transit Administration's guidelines is based on the worst-case (i.e., loudest possible) construction noise hour (assuming the two loudest pieces of equipment would operate at full capacity continuously for at least a one-hour period) during each phase of the four-phase construction program, and during potential overlapping construction activities (i.e., to evaluate the potential for combined impact from overlapping construction activities within a phase or overlapping construction activities between Phases 1 and 2, between Phases 2 and 3, or between Phases 3 and 4). As noted, the four-phase construction program summarized under "Project Features," pp. 4.D.32-4.D.35, is preliminary and the phases could be developed in a different order. The preliminary construction phasing program is also described in Chapter 2, Project Description, pp. 2.91-2.96, with phase estimates shown in Table 2.5: Preliminary Construction Phasing Program and illustrated in Figure 2.30: Preliminary Construction Phasing Diagram.

The noise impact assessment also considers the potential for a 10-dBA increase over existing ambient levels at off-site receiving locations due to persistent construction noise. Persistent construction noise creating a 10-dBA increase over existing ambient levels for an extended duration would be considered a substantial temporary increase because, as discussed above under "Sound Fundamentals," pp. 4.D.2-4.D.4, it represents a perceived doubling of the existing noise level. Similar to the Federal Transit Administration's general assessment, for consideration of construction noise impacts due to temporary increases over existing levels, the hourly L_{eqs} from the two loudest pieces of equipment (impact and non-impact) during each phase of the construction program or overlapping construction activities of subsequent phases were compared to the ambient daytime L_{eqs} measured at nearby sensitive receptors. However, unlike the Federal Transit Administration's general assessment, the hourly L_{eqs} were calculated after typical usage factors were applied to the equipment, as provided in the FHWA Roadway Noise Construction Model (RCNM). The construction equipment sound levels are shown in Table 4.D.9: Representative Construction Equipment Noise Levels – Average Hourly Use.

The assessment was completed for noise-sensitive receptor areas around the perimeter of the project site with reference to specific modelled receptor locations on the north side of California Street, the east side of Presidio Avenue, the south side of Euclid Avenue, and west side of Laurel Street (see Figure 4.D.2, p. 4.D.13).

Attenuation of construction noise may be provided by sloping terrain or intervening buildings. However, as a conservative measure, these attenuating factors were not accounted for in this assessment, and construction noise that is received at offsite receptor locations may, at some locations, be lower than the conservative levels calculated for this assessment.

Table 4.D.9: Representative Construction Equipment Noise Levels – Average Hourly Use

Equipment	***Average Hourly L_{eq} at 50 feet (dBA)*** **NOTE A**	***Average Hourly L_{eq} at 100 feet (dBA)*** **NOTE A**
Aerial Lifts	68	62
Air Compressors	74	68
Caisson Drill **NOTE B**	77	71
Crawler Tractors with Rippers	80	74
Excavators	77	71
Excavators with Hoe Ram (impact)	83	77
Forklifts	75	69
Pavers	74	68
Paving Equipment	74	68
Pumps	78	72
Rollers	73	67
Rough Terrain Forklifts	75	69
Skid Steer Loaders (Bobcat)	75	69
Sweepers/Scrubbers	72	66
Tractors/Loaders/Backhoes	80	74

Notes:
[A] Based on average hourly noise level, assuming typical equipment operating capacities and usage factors.
[B] Caisson drill noise predominantly from excavator that operates the caisson drill equipment; noise emissions assumed identical to excavator for the purposes of this study.

Source: Federal Highway Administration Roadway Construction Noise Model, February 2006

Methodology for Analysis of Operations

Operational noise from the proposed project or project variant would result primarily through project-related increases in traffic, addition of stationary equipment, and introduction of new uses and activities on the project site. Operational noise evaluated in this section includes: (1) noise increases resulting from the proposed project's or project variant's stationary and mobile noise sources (Impacts NO-3 and NO-4, respectively); and (2) compatibility of the proposed project's or project variant's noise-sensitive uses and existing uses in the project site vicinity with future noise levels at the project site, as defined by the San Francisco Land Use Compatibility Guidelines for Community Noise (Impact NO-5). Additionally, any operations or activities with the potential to cause sleep disturbance were evaluated to determine if a significant noise impact would result (Impacts NO-4, NO-5 and NO-6).

TRAFFIC

The traffic noise assessment evaluates traffic conditions with and without the proposed project or project variant to determine whether increases in traffic-related noise are expected to result in a significant impact. To assess traffic noise impacts from the proposed project or project variant, traffic sound levels were calculated for existing volumes and for the increased traffic volumes under existing plus proposed project or project variant. To assess cumulative traffic noise impacts in the future from the proposed project or project variant, expected growth in traffic, and foreseeable future projects in the vicinity, traffic sound levels were calculated from horizon year (2040) volume estimates, with and without the proposed project or project variant traffic volumes.

Traffic noise modeling was completed using the Federal Highway Administration Traffic Noise Model (TNM) Lookup tool, version 2.1 (TNM Lookup). Traffic increases associated with the proposed project or project variant would result in traffic noise increases along local streets. In general, a traffic noise increase of less than 3 dBA is barely perceptible in active outdoor environments, while a 5-dBA increase is readily perceptible.[28] Therefore, a permanent increase in ambient noise of more than 5 dBA is considered a significant noise impact in any existing noise environment (as defined by the San Francisco Land Use Compatibility Chart for Community Noise [Table 4.D.7, p. 4.D.20]) when compared to existing plus project conditions. However, where the existing noise environment is "Conditionally Acceptable," "Conditionally Unacceptable," or "Unacceptable" based on the San Francisco Land Use Compatibility Chart for Community Noise, an increase greater than 3 dBA is considered a significant noise impact.

[28] California Department of Transportation, Division of Environmental Analysis, Technical Noise Supplement to the Traffic Noise Analysis Protocol, September 2013, Table 2-10, http://www.dot.ca.gov/hq/env/noise/pub/TeNS_Sept_2013B.pdf, accessed May 25, 2018.

To model traffic, peak-period traffic volumes were calculated using (1) average daily traffic (ADT) data from the transportation consultant,[29] and (2) temporal traffic patterns established using the long-term sound level measurements hourly Leq data. To calculate the 24-hour Ldn, the p.m. peak to Ldn ratio derived from the measured sound levels was applied to the model-calculated p.m. peak hourly traffic sound level. A summary of the project traffic data can be found in Table NO-4 in EIR Appendix E. Sound level measurement data can be found in Tables NO-1 through NO-3 in that appendix.

Traffic composition (i.e., percentage of cars and trucks) was based on the default values from the Synchro traffic volume model for all roadways,[30] and included 98 percent light-duty vehicles and 2 percent heavy-duty vehicles.[31] Speed limits were identified though onsite observations and from review of readily available online street images (i.e., Google Streetview). Online aerial imagery and geographic information system software was used to calculate distances between the center lines of roadways and the nearest existing residential receptor location. Project drawings were used to determine distances from roadways to future onsite receptors.

Traffic noise levels in the project vicinity were calculated for 15 roadway segments using traffic data provided for the intersections closest to the project site. The selected roadway segments were considered to have the highest potential for impact from traffic generated by the proposed project and project variant.

As stated above, the noise standards identified above (more than a 5-dBA increase, or 3-dBA increase where ambient noise levels are “Conditionally Acceptable”, “Conditionally Unacceptable”, or “Unacceptable” for noise-sensitive receptors) were applied to determine whether the incremental noise increases in traffic noise would be considered significant.

ONSITE SOURCES

The operational noise assessment considers the potential for noise from stationary equipment (e.g., air handling equipment, generators, etc.) to exceed the allowed operational noise limit of section 2909(a) (5 dBA above ambient at a residential property plane), section 2909(b) (8 dBA above ambient at a commercial property plane), and section 2909(d) of the noise ordinance (i.e., interior noise limits of 45 dBA between the hours of 10 p.m. to 7 a.m. or 55 dBA between the

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[29] Kittelson and Associates, Inc., 3333 California Street – Average Daily Traffic Volumes – Methodology and Results Memorandum, November 14, 2017. (See EIR Appendix F: Air Quality Calculation Details and Supporting Information.)

[30] Synchro is a computer program that analyzes and optimizes traffic scenarios. Synchro traffic data generated by the project traffic consultant, Kittelson and Associates, Inc., were utilized for this assessment.

[31] Kittelson and Associates, Inc., 3333 California Street – Final Travel Demand Memorandum, March 9, 2018. (See EIR Appendix D: Transportation and Circulation Calculation Details and Supporting Information.)

hours of 7 a.m. to 10 p.m., as discussed on p. 4.D.18). The limits are based on both absolute permanent increases over existing conditions due to operation of stationary sources such as heating/ventilation/air conditioning (HVAC) systems, generators and activities such as loading, (section 2909[a] and [b]) and interior sound level limits at residential receptors.

Summary of Limits and Performance Standards Applied in Noise Analysis

The following limits and performance standards are applied in this analysis for identifying potentially significant noise impacts:

CONSTRUCTION

- Section 2907(a): Construction equipment must not emit sound levels in excess of 80 dBA when measured at a distance of 100 feet from the equipment, or an equivalent sound level at some other convenient distance (e.g., 50 feet from the source). Impact tools and equipment are conditionally exempt from this requirement, provided that such impact tools and equipment have intake and exhaust mufflers recommended by the manufacturer, and that pavement breakers and jackhammers are equipped with acoustically attenuating shields or shrouds recommended by the manufacturer. These construction noise limits were applied in Impact NO-1, p. 4.D.36.
- The San Francisco noise ordinance does not identify noise limits for impact equipment or limit noise from combined construction activities or equipment at specific receptor locations. Therefore, this evaluation applies the Federal Transit Administration general assessment noise impact criteria to construction noise. Construction noise impacts would be expected if construction noise levels calculated using the general assessment methodology exceed an hourly L_{eq} of 90 dBA at exterior use areas of residential receptors during daytime hours. This is applied in Impact NO-1, p. 4.D.36.
- To assess the potential for impacts due to temporary daytime increases over ambient levels during construction, the Planning Department considers a persistent construction-related increase of 10 dBA or more over ambient levels to be a substantial increase. This is applied in Impact NO-1, p. 4.D.36.

OPERATION

- Section 2909(a): Noise from operation of residential uses shall not exceed existing ambient noise levels at residential receiving properties by more than 5 dBA. Existing ambient noise levels shall be defined by the L_{90} but, per section 2901, shall in no cases be considered to be less than 35 dBA for interior residential locations and 45 dBA in all other locations. These noise limits were applied in Impact NO-3, p. 4.D.58, to stationary sources.
- Section 2909(b): Noise from operation of commercial uses shall not exceed existing ambient noise levels at any point outside of the property plane by more than 8 dBA. Existing ambient existing noise levels shall be defined by the L_{90} but shall in no cases be considered to be less than 45 dBA. These noise limits also were applied in Impact NO-3, p. 4.D.58 to stationary sources.
- Section 2909(d): To prevent sleep disturbance and protect public health, no fixed noise source may cause the noise level measured inside any sleeping or living room in any

dwelling unit to exceed 45 dBA between the hours of 10 p.m. to 7 a.m. or 55 dBA between the hours of 7 a.m. to 10 p.m. This noise limit is applied in Impact NO-3, p. 4.D.58, to stationary sources that would be located near onsite or offsite residential uses.

- A substantial permanent increase in traffic noise levels of 3 dBA L_{dn} or more where the existing and/or resulting noise levels are in any category *other than* "Acceptable," according to the Land Use Compatibility Chart for Community Noise, and 5 dBA L_{dn} or more where the existing and/or resulting noise levels are "Acceptable," according to the Land Use Compatibility Chart for Community Noise (Table 4.D.7, p. 4.D.20). This standard is applied in Impact NO-4, p. 4.D.62, and Impact C-NO-2, p. 4.D.71.
- Title 24 of the California Building Code specifies a maximum interior noise limit of 45 dBA (L_{dn} or CNEL) for residential uses. This standard is applied in Impact NO-5, p. 4.D.64, to proposed new onsite residential uses.
- Exposure of new noise-sensitive uses to long-term (i.e., operational) sound levels exceeding those deemed "Acceptable" as identified in the Environmental Protection Element of the San Francisco General Plan (Table 4.D.7, p. 4.D.20). For residential uses, the maximum level considered "Acceptable" is 60 L_{dn}, and levels greater than 70 dBA are considered "Conditionally Unacceptable" where new construction is discouraged. For daycare facilities (considered equivalent to schools in this analysis), the maximum level considered "Acceptable" is 63 dBA L_{dn}. This standard is applied in Impact NO-5, p. 4.D.64.

Vibration

The following summarizes the methodology applied in this assessment to evaluate vibration-related impacts due to construction of the proposed project or project variant. Operation of the proposed project or project variant is not anticipated to generate perceptible levels of vibration at either onsite or offsite receptors. Most traffic anticipated during operation of the proposed project or project variant would be rubber-tired and operating on pavement that is in good condition. No major sources of vibration are anticipated within any of the proposed new structures. Garbage collection would occur at off-street locations, or would be completed along existing streets, but would be comparable to existing garbage collection activities, and therefore not a substantial vibration source. For these reasons, operational vibration is not considered further.

Methodology for Analysis of Construction Vibration Impacts

Project-related construction vibration is evaluated using methods identified in Federal Transit Administration guidance.[32] As discussed on p. 4.D.5 under "Fundamentals of Groundborne Vibration," groundborne vibration generated by construction equipment is generally evaluated by the maximum rate or velocity of particle movement, commonly referred to as the peak particle

[32] Federal Transit Administration, *Transit Noise and Vibration Impact Assessment*, pp. 12-10 – 12-12, May 2006, https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/FTA_Noise_and_Vibration_Manual.pdf, accessed May 25, 2018.

velocity (PPV), typically measured in inches per second (in/sec). Except for pile-driving activities, most construction activities typically range from between approximately 0.003 PPV and 0.21 PPV, when measured at 25 feet from the source. Vibration levels for typical construction equipment are shown in Table 4.D.10: Vibration Source Levels for Construction Equipment.

Table 4.D.10: Vibration Source Levels for Construction Equipment

Equipment	PPV_{ref} at 25 ft (in/sec) NOTE A	PPV at 50 ft (in/sec) NOTE B
Vibratory Roller	0.210	0.074
Hoe Ram	0.089	0.031
Large Bulldozer	0.089	0.031
Caisson Drilling	0.089	0.031
Loaded Trucks	0.076	0.027
Jackhammer	0.035	0.012
Small Bulldozer	0.003	0.001

Notes:
[A] PPV – Peak Particle Velocity. Groundborne vibration generated by construction equipment often is evaluated by the maximum rate – or velocity – of particle movement, commonly referred to as the peak particle velocity or PPV, typically measured in inches per second (in/sec).
[B] Based on $PPV_{ref} \times (25/D)^{1.5}$ where PPV_{ref} is the reference vibration level identified in the second column and D is the distance from the equipment to the receptor.

Source: Federal Transit Administration, *Transit Noise and Vibration Impact Assessment*, May 2006

The assessment of construction vibration impacts uses the following assumptions:

- No pile driving is proposed. Equipment may operate at the boundary of each phase of the four-phase construction program (see Figure 4.D.2, p. 4.D.13, for the boundaries).
- The vibration level at a receptor (i.e., a nearby building) is equal to $PPV_{ref} \times (25/D)^{1.5}$ where PPV_{ref} is the reference vibration level identified in Table 4.D.10, and D is the distance from the equipment to the receptor.

The calculated vibration levels at each receptor using the above assumptions are then compared to the level of "strong perceptibility" as identified by Caltrans (i.e., 0.1 in/sec) or the structural damage levels, which vary based on structure type (see Table 4.D.6, p. 4.D.17).

Limits and Performance Standards Applied in Vibration Analysis

The following limits and performance standards are applied in this analysis for identifying potentially significant vibration impacts:

- Generation of construction-related groundborne vibration levels exceeding the "strongly perceptible" level of 0.1 in/sec PPV at offsite sensitive receptors (i.e., annoyance) during nighttime hours.
- Generation of construction-related groundborne vibration levels exceeding the damage standards at onsite or offsite structures based on building classes identified in Table 4.D.6, p. 4.D.17). (i.e., structural damage).

These standards are applied in Impact NO-2, p. 4.D.51.

PROJECT FEATURES

The proposed project or project variant is a mixed-use development located on the block bounded by California Street to the north, Presidio Avenue to the east, Masonic Avenue to the southeast, Euclid Avenue to the south, and Laurel Street/Mayfair Drive to the west in San Francisco's Presidio Heights neighborhood.

The project site is currently developed with a four-story office building and partially below-grade parking garage at the center of the site; a one-story annex building at the corner of California and Laurel streets; three surface parking lots connected by internal roadways; two circular garage ramp structures leading to below-grade parking levels; and landscaping or landscaped open space. The office building contains UCSF administrative, academic research, social and behavioral science departments, and daycare uses. All uses, including the daycare center, would move to another UCSF campus before the first phase of the construction program begins. Phase 1 would include the demolition of the annex building and the south wing of the existing office building at the center of the site (including the auditorium at the southeast portion of the building). During excavation for Phase 1 near the location of the demolished south wing and outdoor courtyard of the existing office building (south central portion of site), rock fragmentation by a hoe ram would be required to remove bedrock that is near the surface.

Future Noise Sensitive Land Uses on the Project Site

Under the proposed project, future noise-sensitive land uses would include the proposed residential uses in the Masonic, Euclid, Center A, Center B, Plaza A, Plaza B, and Mayfair buildings, and the Laurel Duplexes and the proposed daycare use in the proposed Walnut Building. Under the project variant, future noise-sensitive land uses would be the same except that the proposed Walnut Building would include daycare, retail, and residential uses (rather than the proposed daycare, retail, and office uses under the proposed project).

Proposed Project and Phasing

For purposes of the construction noise analysis, the proposed project would be constructed in four phases, designated as Phase 1 (Masonic and Euclid buildings), Phase 2 (Center Buildings A and B), Phase 3 (Plaza A, Plaza B, and Walnut buildings), and Phase 4 (Mayfair Building and Laurel Duplexes); however, the order of the phases and the length of the phase overlaps may change. The preliminary construction phasing program is described in Chapter 2, Project Description, pp. 2.91-2.96, and summarized below. Preliminary phase estimates are shown in Table 2.5: Preliminary Construction Phasing Program, p. 2.94, and illustrated in Figure 2.30: Preliminary Construction Phasing Diagram, p. 2.92. The four construction phases would be sequential and would last a total of approximately seven years, with some overlap of the phases:

- Phase 1 (including approximately 2 months of demolition) would last 30 months. The Masonic and Euclid buildings – proposed to include 196 residential units, retail space, and a garage – as well as portions of the privately owned public open spaces would be constructed during Phase 1. A new sewer line under Masonic Avenue and natural gas lines under Masonic and Euclid avenues would also be constructed during Phase 1.
- Phase 2 would last approximately 24 months and would overlap with Phase 1 for approximately 11 months. Demolition during Phase 2 would include the separation of the existing building into two buildings (Center Buildings A and B), the creation of an interior light well in Center Building B (the easternmost building), and the removal of the northeast portion of the existing building and circular garage ramp structures (Center Building B). Rehabilitation would include interior remodeling, vertical additions, and associated structural and foundation shoring. Center Buildings A and B would include 190 residential units and two parking garage levels. Exterior and interior finishing work in Phase 2 would occur after the Masonic and Euclid buildings, constructed during Phase 1, were completed and, potentially, occupied.
- Phase 3 would take approximately 36 months and would overlap with Phase 2 for approximately 9 months. During Phase 3, the Plaza A, Plaza B, and Walnut buildings would be constructed along California Street. Phase 3 would include the construction of 128 residential units, retail space, offices, childcare space, and garages, as well as additional outdoor plazas and public spaces. Construction activities related to the foundation and structural work and the exterior and interior finish work of Phase 3 would occur after the Phase 2 Center Buildings A and B were completed and, potentially, occupied.
- Phase 4 would last approximately 20 months and would overlap with Phase 3 for 6 months. During Phase 4, the Mayfair Building and Laurel Duplexes would be constructed. Phase 4 would include construction of 44 residential units, garage space, and Euclid Green and right-of-way improvements. Construction activities related to the structural work and the exterior and interior finish work would occur after the Plaza A, Plaza B, and Walnut buildings were completed and occupied, including the new daycare facility in the Walnut Building.

Overall, each of the four phases of the construction program would include demolition, excavation, and placement of foundations for structures; fabrication of structures; and exterior and interior work. Demolition and construction activities would require the use of heavy trucks, excavators, material loaders, cranes, and other mobile and stationary construction equipment. During the proposed project's or project variant's approximately seven-year construction period, construction activities would result in levels of construction noise emissions that would vary as project development proceeds, and as phases of the construction program overlap and equipment and activities move around the project site. As previously noted, there would be some overlap of construction phases in the seven-year construction program. For a 15-year construction program, there may not be overlap of construction phases. Therefore, a seven-year construction program would result in greater noise levels for a shorter period of time. A change in the order of the phases would not change the results of the noise analysis; it would only change the timing of noise effects at various sensitive receptor locations, because the type of construction equipment and the conservative approach to estimating construction noise impacts would not change. A list of construction equipment expected to be used for the proposed project or project variant by phase and construction activity is shown in Table 4.D.11: Preliminary Construction Equipment List by Activity.

Table 4.D.11: Preliminary Construction Equipment List by Activity

Equipment NOTE A	Construction Activity NOTE B	Total Equipment Quantity	Peak Hourly L_{eq} at 50 feet NOTE C	Average Equipment Use Hourly L_{eq} at 50 feet NOTE D
Rough Terrain Forklifts	All	2	79	75
Sweepers/Scrubbers	All	1	82	72
Air Compressors	Demolition	2	78	74
Skid Steer Loaders (Bobcat)	Demolition	1	79	75
Crawler Tractors with Rippers	Excavation	1	84	80
Excavators	Excavation	2	81	77
Excavators with Hoe Ram (impact)	Excavation NOTE E	2	**90**	**83**
Tractors/Loaders/Backhoes	Excavation	2	84	80
Aerial Lifts	Exterior	2	75	68
Forklifts	Exterior	1	79	75
Pavers	Exterior	1	77	74
Paving Equipment	Exterior	1	77	74
Rollers	Exterior	1	80	73
Pumps	Structure	1	81	78

Notes: Construction equipment and phase usage adapted from information provided by the Prado Group and Webcor Builders, updated September 2017. **Boldface values** indicate an exceedance of the noise ordinance.

A This list does not include electrically powered equipment not expected to emit high noise levels.

B Applies to Phases 1 through 4 of the construction phasing program.

C Based on highest anticipated sound level, assuming 100 percent use during any one hour period.

D Based on average anticipated sound level, assuming typical hourly use per hour (% of hour).

E Two excavators could operate at any one time but only one excavator fitted with a hoe ram would complete hoe ram activities at any one time.

Source: Federal Highway Administration Roadway Construction Noise Model, February 2006

Project Variant

The project variant would increase the number of residential units that would be developed with the proposed project by 186 residential units, for a total of 744 residential units. Under the variant, office space in the proposed Walnut Building would instead be developed as residential space. The proposed Walnut Building would have three additional floors (for residential uses), increasing in height from 45 feet with the proposed project to 67 feet with the project variant. An additional 74 vehicle parking spaces would be provided under the project variant. In the project variant, the other proposed new building configurations would not change relative to the proposed project.

The preliminary construction phasing plan described above would also be applicable to the project variant with the exception of Phase 3. Under the project variant, Phase 3 would include the development of 153,920 gross square feet of residential uses (186 units), substituting for 49,999 gross square feet of office space. Under the project variant, Phase 3 garage space would increase by 6,360 gross square feet (from 301,060 gross square feet for the proposed project to 307,420 gross square feet). Although the parking garage would be larger and the Walnut Building would be taller under the project variant there would be no change in the amount of excavation or the construction durations for those components of Phase 3 [excavation, foundations, and building structure]. Additionally, operational differences that would result from development of the project variant are already captured in the operations analysis for the proposed project because it would generate more vehicle trips.

IMPACT EVALUATION

Construction Impacts on Existing and Future Land Uses

During each phase of the four-phase construction program, a range of activities requiring different types of equipment would take place concurrently at different locations, as shown in Table 4.D.11, p. 4.D.34. Construction activities are anticipated to occur Monday through Friday, between 7 a.m. and 7 p.m.[33] Some work could occur on Saturdays between 7 a.m. and 3 p.m. There is no proposed nighttime construction work. Although nighttime construction work is not anticipated, nor is construction anticipated to occur on Sundays or major legal holidays, if nighttime construction work is necessary for discrete events such as concrete pours or utility work, a special work permit granted by the Director of Public Works or the Director of Building Inspection as described in Article 29 of the police code would be required.

During construction, noise from construction activities and equipment could expose nearby existing offsite and future onsite sensitive receptors to temporary increases in noise levels that exceed ambient levels. The proposed project or project variant would be developed in four sequential phases lasting a total of approximately seven years. Residential units would be occupied once construction of each phase of the construction program is completed. New residences would also be exposed to noise from the excavation, demolition, and other construction activities of later phases of the construction program. Overlap between Phases 1 and 2, and between Phases 2 and 3 would occur, as described on p. 4.D.32. During each phase, construction activity would include demolition, excavation including rock fragmentation, placement of foundations for structures, fabrication of structures, and exterior and interior finishing work. Demolition and construction activities would require the use of heavy trucks,

[33] Construction activities are allowed during daytime hours between 7 a.m. and 8 p.m. every day of the week. As noted on p. 4.D.18, under Police Code Section 2908, noise from construction activities between the hours of 8 p.m. and 7 a.m. (including erecting, constructing, demolishing, excavating for, altering or repairing) shall not exceed 5 dBA over ambient levels at the nearest property plane unless a work permit has been applied for and granted by the Director of Public Works or the Director of Building Inspection.

excavators, material loaders, cranes, and other mobile and stationary construction equipment. Excavation would require use of excavators, crawler tractors with rippers, and loaders. The loudest equipment that would be used during project construction is an excavator equipped with a hoe ram, required for rock fragmentation during the excavation component of each phase of the construction program. In addition to onsite construction activities, trucks hauling materials to and from the project site may result in increased levels of offsite noise.

Impact NO-1: Construction of the proposed project or project variant would expose people to or generate noise levels in excess of applicable standards or cause a substantial temporary or periodic increase in ambient noise levels. (*Significant and Unavoidable with Mitigation)*

Construction Noise at Offsite Receptors

Offsite noise-sensitive receptors around the perimeter of the project site include residential dwellings along Euclid Avenue (represented by Receptors R1 and R2), Laurel Street (represented by Receptors R3 and R4), California Street (represented by Receptor R5), and Presidio Avenue (represented by Receptor R8); the Helen Diller Preschool at the Jewish Community Center of San Francisco on the north side of California Street between Presidio Avenue and Walnut Street (represented by Receptor R6); and a hotel at the northeast corner of California Street and Presidio Avenue (represented by Receptor R7). These receptors are listed in Table 4.D.4: Sensitive Receptors in the Project Vicinity (p. 4.D.12), and their locations are shown in Figure 4.D.2, p. 4.D.13. Noise-sensitive receptors range in distance to the nearest portion of the site from between 60 feet and 240 feet.

Generation of Noise Levels in Excess of City Noise Limits at Offsite Receptors

The noise limit for non-impact construction equipment, as summarized in section 2907(a) of the noise ordinance, is 80 dBA when measured at a distance of 100 feet from the source, which equates to 86 dBA at 50 feet.[34] To assess compliance with section 2907, noise levels from construction equipment were calculated at a distance of 100 feet from individual equipment. As indicated, impact equipment (e.g., hoe rams, jackhammers, etc.) was not considered in this assessment, per the conditional exemption provided in section 2907(b). Noise levels used for this evaluation of potential worst-case noise levels during construction were based on the highest (i.e., peak) L_{eq} noise levels during any one hour, assuming continuous equipment operation.

Excavation would be the loudest construction activity, and the loudest piece of non-impact equipment during excavation activities would be a loader or backhoe, both of which emit an hourly L_{eq} of 78 dBA at a distance of 100 feet, or 84 dBA at 50 feet (assuming continuous

[34] Based on a standard noise level increase from a point source of 6 dBA per halving of distance to the stationary noise source.

operation over an hour). See Table 4.D.8, p. 4.D.24, for a summary of sound level data from all construction equipment at 50 feet and 100 feet. Loader/backhoe equipment would comply with section 2907 of the noise ordinance, which limits noise levels to 80 dBA at 100 feet.

As shown in Table 4.D.8, p. 4.D.24, the estimated noise levels for all non-impact construction equipment are expected to be less than 80 dBA at 100 feet (or 86 dBA at 50 feet) and would comply with the limits in section 2907(a) of the noise ordinance. Therefore, impacts related to compliance with local standards related to construction noise from non-impact equipment would be less than significant. Although noise from construction equipment is expected to comply with section 2907(a) of the noise ordinance, it would be noticeable to nearby offsite receptors. Construction noise reduction strategies identified relative to the persistent construction noise increases associated with the simultaneous use of the two loudest pieces of equipment (discussed below under "Generation of Substantial Temporary Increase in Offsite Noise Levels", p. 4.D.47) would be implemented during project construction and would further reduce the less-than-significant noise impacts related to compliance with local standards for construction noise from non-impact equipment.

Generation of Combined Construction Equipment Noise Levels in Excess of the Federal Transit Administration Assessment Criteria at Offsite Receptors

During the excavation component of each phase of the construction phasing program, an excavator with a hoe ram would be required for rock fragmentation and would emit a noise level of 90 dBA at 50 feet during peak hourly equipment use (see Table 4.D.11, p. 4.D.34). As summarized in Table 4.D.13: Highest Noise Increases over Ambient Levels During Construction, p. 4.D.40, the shortest excavation period would be expected to occur during Phase 2 (1 month) and the longest period of excavation would be expected to occur during Phase 1 (7 months). An excavator with hoe ram represents the loudest construction equipment that would operate during project construction. It was assumed that only one hoe ram would operate at any one time, and it would operate concurrently with a loader (the second loudest equipment that would operate during construction).

A summary of the estimates of offsite construction noise levels is presented in in Table 4.D.12: Peak Construction Noise Levels at Offsite Receptors and Compliance with Federal Transit Administration Criteria. As shown in Table 4.D.12, the loudest offsite construction noise levels would be 83 dBA at Receptor R3 (representative of residences on the west side of Laurel Street). This level of construction noise would occur during excavation activities for Phase 4 (the Laurel Duplexes and Mayfair Building), during use of loaders. Estimated noise levels at all noise-sensitive receptors would be below the Federal Transit Administration 90-dBA L_{eq} noise impact standard (see p. 4.D.25). The construction noise estimates identified in Table 4.D.12 are considered conservative because they are based on the continuous peak noise emissions of the simultaneous operation of the two loudest pieces of construction equipment over a one-hour period. Construction noise impacts related to an exceedance of the Federal Transit Administration criteria for combined construction noise would be less than significant. However, construction noise reduction strategies identified relative to the persistent construction noise increases associated with the simultaneous use of the two loudest pieces of equipment (discussed below under "Generation of Substantial Temporary Increase in Offsite Noise Levels") would be implemented during project construction, and would therefore further reduce the less-than-significant noise impacts related to compliance with Federal Transit Administration standards for construction noise.

Generation of a Substantial Temporary Increase in Offsite Noise Levels

As summarized on p. 4.D.25, a significant impact would be expected if construction activities resulted in a persistent increase over the ambient daytime L_{eq} of 10 dBA or more for an extended duration. As indicated, to complete this assessment, construction equipment noise levels were based on U.S. Federal Highway Administration and Federal Transit Administration construction equipment noise data after standard usage factors were applied to the equipment prior to calculating the hourly L_{eqs} to account for average or typical use (i.e., not continual peak use). The resulting average construction equipment noise levels are shown in Table 4.D.9, p. 4.D.26.

Table 4.D.12: Peak Construction Noise Levels at Offsite Receptors and Compliance with Federal Transit Administration Criteria

Receptor NOTE A		Construction Activity and Peak Noise Level (dBA)			
ID	**Primary Use**	**Phase**	**Activity NOTE B**	**Location NOTE C**	**L_{eq}**
R1	Residential	Phase 1	Excavation	Euclid Building	80
R2	Residential	Phase 4	Excavation	Laurel Duplexes	79
R3	Residential	Phase 4	Excavation	Laurel Duplexes	83
R4	Residential	Phase 4	Excavation	Mayfair Building	81
R5	Residential	Phase 3	Excavation	Plaza B Building	82
R6	Daycare/Community Center	Phase 3	Excavation	Walnut Building	81
R7	Hotel	Phase 3	Excavation	Walnut Building	73
R8	Residential	Phase 2	Excavation	Center Building B	74

Notes: Construction noise estimates considered conservative, based on continuous peak noise levels over a 1-hour period of the simultaneous operation of the two loudest pieces of construction equipment for comparison with FTA 90-dBA noise impact standard.

[A] Receptor locations are shown on Figure 4.D.2, p. 4.D.13.

[B] Construction activity equipment includes one excavator with hoe ram (impact) and one loader; represents loudest two pieces of equipment that could operate at the same time.

[C] For purposes of noise modeling, construction equipment noise sources are centrally located within project building construction footprints.

Source: Ramboll, 2018

Using the average construction equipment noise levels in Table 4.D.9, noise levels by activity and overlapping phases of the construction program were identified at offsite receptor locations.[35] Similar to the Federal Transit Administration impact criteria comparison, construction equipment noise levels were calculated assuming the two loudest pieces of equipment would operate simultaneously for one hour at the approximate center of the closest activity. Unlike the Federal Transit Administration general assessment (i.e., 90-dBA noise impact standard), the following assessment evaluates the increases over ambient levels after adding construction noise to the existing noise levels. The calculated levels of preliminary construction phasing/activity combinations by receptor are displayed in Table 4.D.13.

Table 4.D.13 presents the preliminary phase/construction activity combinations that would result in an impact of greater than 10 dBA (+10 dBA) over existing sound levels, and the range of increases of existing sound levels for all other construction activities that are below the +10 dBA standard. (See Table NO-5 in EIR Appendix E for a complete list of results for all receptors during all periods of construction.)

Euclid Avenue

As summarized in Table 4.D.13, at residential uses located south of Euclid Avenue and represented by Receptors R1 and R2, increases over existing ambient sound levels would be 16 dBA and 11 dBA, respectively, with use of an excavator with a hoe ram during Phase 1 excavation activities, exceeding the impact standard of +10 dBA, and resulting in significant noise impacts at these locations. The excavation component of this phase of the construction program is anticipated to last for a total duration of approximately seven months. Increases of 16 dBA and 11 dBA would not be expected to occur at all times during this seven-month construction period, but they would occur periodically when hoe rams operate nearest these receptors.

During construction of the Euclid Building (Phase 1 [Structure]), sound levels at Receptor R1 (Euclid Avenue) would increase by up to 10 dBA over existing sound levels, resulting in significant noise impacts. The building construction component of this phase of the construction program is anticipated to last for a total duration of approximately five months. Noise during construction activities associated with the Euclid Building would fluctuate, and, depending on equipment usage and location, construction-related noise level increases would fall below the +10 dBA impact standard during some periods.

[35] Phasing order is considered preliminary for the purposes of this assessment, including the order of phases and length of phase overlaps. However, with no change to the portfolio of construction equipment and duration of daily use, phasing variations would not substantially change the magnitude or severity of any impact.

Table 4.D.13: Highest Noise Increases over Ambient Levels During Construction

Receptor ID	Receptor Primary Use	Existing Noise Level (L_{eq}, dBA) NOTE A	Phase / Construction Activity NOTE B	Activity Duration (months) NOTES B,C	Maximum Increase of Construction Noise Level over Existing Noise Level (L_{eq}, dBA) NOTE D
R1	Residential (Euclid)	58	Phase 1 Excavation	7	**16**
			Phase 1 Structure	5	**10**
			Phase 2 Excavation	1	**10**
			Phase 4 Excavation	2	**12**
			All Other	68	8
R2	Residential (Euclid)	58	Phase 1 Excavation	7	**11**
			Phase 4 Excavation	2	**15**
			Phase 4 Structure and Phase 4 Exterior (Overlap)	3	**10**
			All Other	70	9
R3	Residential (Laurel)	59	Phase 1 Excavation	7	**10**
			Phase 4 Excavation	2	**17**
			Phase 4 Structure	6	**13**
			All Other	68	9
R4	Residential (Laurel)	59	Phase 2 Excavation	1	**10**
			Phase 3 Excavation	7	**14**
			Phase 4 Excavation	2	**16**
			Phase 4 Structure	6	**11**
			All Other	68	9
R5	Residential (California)	67	Phase 3 Excavation	7	**10**
			All Other	82	6
R6	Daycare / Community Center (California)	67	All Phases and Activities	82	9
R7	Hotel (Presidio)	67	All Phases and Activities	82	3
R8	Residential (Presidio)	65	All Phases and Activities	82	5

Notes: Receptor locations are shown on Figure 4.D.2, p. 4.D.13. Construction noise estimates considered conservative, based on continuous typical usage noise levels over a 1-hour period of the two loudest pieces of construction equipment. **Boldface values** indicate an exceedance of the significance threshold criterion.

[A] Existing Noise Level L_{eq} based on complete period measurement between 7 a.m. and 7 p.m. of sound level measurement location closest to receptor.

[B] Order and duration of overlapping phases are considered preliminary; however, variations in phasing would not substantially change the magnitude or severity of any impact.

[C] Approximate duration, in months, based on preliminary construction schedule.

[D] Increases in L_{eq} from existing plus project of 10 dBA or more over ambient levels are considered to be substantial increases in ambient noise levels.

Source: Ramboll, 2018

During Phase 2 excavation activities, use of an excavator with a hoe ram would result in sound levels at Receptor R1 that reach the impact standard of +10 dBA, and would result in a significant noise impact. The excavation component of this phase of the construction program is anticipated to last for a total duration of approximately one month. Noise impacts at Receptor R1 during excavation for Phase 2 would not be expected to occur at all times, and mostly would occur during work at the south end of the Phase 2 footprint (see Figure 4.D.2, p. 4.D.13). During most of this one-month excavation activity, sound level increases would be lower, falling below the +10 dBA impact standard.

During excavation of Phase 4, sound levels at Receptors R1 and R2 (Euclid Avenue) would increase over existing sound levels by as much as 12 dBA and 15 dBA, respectively, resulting in significant noise impacts. The excavation component of this phase of the construction program is anticipated to last for a total duration of approximately two months. Noise impacts at Receptors R1 and R2 during excavation for Phase 4 would not be expected to occur at all times, and mostly would occur during work at the south end of the Phase 4 footprint (see Figure 4.D.2, p. 4.D.13). During this two-month excavation activity, noise levels during construction activities would fluctuate, and depending on equipment usage and location, construction-related noise level increases would fall below the +10 dBA impact standard during portions of the two months.

The preliminary construction phasing schedule would result in combined noise emissions from overlapping structure and exterior construction work at Phase 4 buildings (Laurel Duplexes and Mayfair Building). Sound levels at Receptor R2 (Euclid Avenue) during this overlap in phases would increase by as much as 10 dBA over existing sound levels, resulting in significant noise impacts. The building construction component of this phase of the construction program is anticipated to last for a total duration of approximately three months. During building construction work for Phase 4, noise levels at Receptor R2 (Euclid Avenue) would fluctuate, and depending on equipment usage and location, construction-related noise level increases would fall below the +10 dBA impact standard during portions of the three-month period.

Mitigation Measure M-NO-1: Construction Noise Control Measures, described below, requires implementation of noise control measures in accordance with a noise control plan approved by the Planning Department during all construction activities. In addition, a noise monitoring program would be required during all excavation activities, during building construction (i.e. framing of structure and major exterior work) of the Euclid and Masonic buildings (identified as Phase 1 building construction) and of the Laurel Duplexes and Mayfair building (identified as Phase 4 building construction). This mitigation measure would minimize the potential for noise impacts to the maximum extent feasible; however, construction noise impacts would remain significant and unavoidable with implementation of Mitigation Measure M-NO-1.

Construction Noise Mitigation

Mitigation Measure M-NO-1 identifies required noise control measures intended to reduce the potential for construction noise impacts at offsite receptors and future on-site receptors. As identified above on p. 4.D.38, and below on pp. 4.D.42-4.D.47, the temporary daytime construction noise increases at sensitive residential land uses on the south side of Euclid Avenue, the west side of Laurel Street, and the north side of California Street would be as high as 16 dBA, 17 dBA, and 10 dBA above ambient levels, respectively, during some phases of the construction program, which would be considered a substantial increase. Noise from construction activities at other locations is summarized in Table 4.D.13, p. 4.D.40.

Mitigation Measure M-NO-1: Construction Noise Control Measures

The project sponsor shall implement a project-specific Noise Control Plan that has been prepared by a qualified acoustical consultant and approved by the Planning Department. The Noise Control Plan may include, but is not limited to, the following construction noise control measures. Implementation of applicable construction noise control measures shall apply to all phases of the construction period.

- Muffle and maintain all equipment used on site. All internal combustion engine driven equipment shall be fitted with mufflers that are in good working condition.
- Position stationary noise sources, such as temporary generators and pumps, as far from nearby receptors as possible, within temporary enclosures and shielded by barriers (which could reduce construction noise by as much as 5 dB) or other measures, to the extent feasible.
- Use "quiet" models of air compressors and other stationary equipment where such technology exists.
- Prohibit unnecessary idling of internal combustion engines.
- Impact tools (e.g., jack hammers, pavement breakers, rock drills) used for project construction shall be "quiet" gasoline-powered compressors or electrically powered compressors, and electric rather than gasoline‑ or diesel‑powered engines shall be used to avoid noise associated with compressed air exhaust from pneumatically powered tools. However, where the use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust shall be used; this muffler can lower noise levels from the exhaust by up to about 10 dBA. External jackets on the tools themselves shall be used, which could achieve a reduction of 5 dBA. Quieter equipment shall be used when feasible, such as drills rather than impact equipment.
- Clearly post allowable construction hours (i.e., 7 a.m. to 8 p.m.) on signs around the project site through the duration of construction.
- During the excavation component of all construction phases and during building construction (framing of structure and major exterior work) of the Euclid and Masonic buildings, the Laurel Duplexes, and the Mayfair Building, prepare and implement a daytime construction-noise monitoring program (e.g., 7 a.m. to 7 p.m. during weekdays, and 7 a.m. to 3 p.m. on Saturdays). Three monitoring stations shall be required to provide continuous noise monitoring at the nearest potentially impacted receptors to the south (along Euclid Avenue), to the west (along Laurel

Street), and to the north (along California Street). Selection of the three monitoring locations shall be coordinated between the Planning Department, construction contractor, and ultimately the affected residential property owners. The program shall be set up to alert the Construction Manager or other designated person(s) when noise levels exceed allowable limits (10 dBA above established ambient levels). If noise levels are found to exceed applicable noise limits due to construction-related activities, corrective action shall be taken, such as halting or moving specific construction activities, fixing faulty or poorly operating equipment, and installing portable barriers.

- Designate a Construction Manager who shall:
  - Clearly post his/her name and phone number(s) on signs visible during each phase of the construction program.
  - Notify area residents of construction activities, schedules, and impacts.
  - Receive and act on complaints about construction noise disturbances.
  - Determine the cause(s) and implement remedial measures as necessary to alleviate potentially significant problems related to construction noise.
  - Request night noise permits from the San Francisco Department of Building Inspection (DBI) if any activity, including deliveries or staging, is anticipated outside of work hours that has the potential to exceed noise standards. If such activity is required in response to an emergency or other unanticipated conditions, night noise permits shall be requested as soon as feasible for any ongoing response activities.
  - Notify the Planning Department’s Development Performance Coordinator at the time that night noise permits are requested or as soon as possible after emergency/unanticipated activity causing noise with the potential to exceed noise standards has occurred.

Plan Review, Implementation, and Reporting

The Noise Control Plan shall be reviewed and approved by the San Francisco Planning Department prior to implementation. Noise monitoring shall be completed by a qualified noise consultant.

A noise monitoring log report shall be prepared by the Construction Manager or other designated person(s) on a weekly basis and shall be made available to the Planning Department when requested. The log shall include any complaints received, whether in connection with an exceedance or not, as well as any complaints received through calls to 311 or DBI if the contractor is made aware of them (for example, via a DBI notice, inspection, or investigation). Any weekly report that includes an exceedance or for a period during which a complaint is received should be submitted to the Development Performance Coordinator within 3 business days following the week in which the exceedance or complaint occurred. A report also shall be submitted to the Planning Department Development Performance Coordinator at the completion of each construction phase. The report shall document noise levels, exceedances of threshold levels, if reported, and corrective action(s) taken.

Implementation of construction-related noise control measures in Mitigation Measure M-NO-1 would reduce the proposed project’s or project variant’s temporary or periodic increases in ambient noise levels to the maximum extent feasible. However, these construction-related measures would not necessarily reduce noise increases at the sensitive residential land uses on the south side of Euclid Avenue (Receptors R1 and R2), the west side of Laurel Street (p. 4.D.44, Receptors R3 and R4), the north side of California Street (p. 4.D.46, Receptor R5), and future onsite receptors to below the +10 dBA standard over ambient conditions during construction activities that would generate high levels of noise (i.e., general excavation of all phases and building construction activities in Phases 1 and 4). Although construction-related impacts are considered temporary, they would be persistent over certain phases of construction during the seven-year construction period and would represent a 10-dBA increase over ambient noise levels; therefore, this impact is considered significant and unavoidable.

Laurel Street

As summarized in Table 4.D.13, p. 4.D.40, at residential uses located at the south end of Laurel Street, represented by Receptor R3, increases over existing ambient sound levels would be 10 dBA over existing ambient conditions during excavation for the Euclid Building (preliminarily identified under Phase 1 excavation), resulting in a significant noise impact. As indicated above, the excavation component of this phase of the construction program is anticipated to last for a total duration of approximately seven months with the last two months of excavation activities overlapping with foundation activities during the same construction phase. During most of the seven-month excavation, increases over ambient sound levels would be lower than presented in Table 4.D.13, p. 4.D.40, occasionally falling below the +10 dBA impact standard. During the approximate 2-month overlap period with foundation activities, increases of 10 dBA would not be expected to occur at all times, and increases of 10 dBA would only be expected during excavation activities, when the excavator with a hoe ram operates nearest the western portion of the site (see Figure 4.D.2, p. 4.D.13).

During excavation for the Laurel Duplexes and Mayfair Building (preliminarily identified under Phase 4 excavation), sound levels at Receptors R3 and R4 (Laurel Street) would increase by 17 dBA and 16 dBA, respectively, over existing sound levels, resulting in significant noise impacts. The excavation component of this phase of the construction program is anticipated to last for a total duration of approximately two months and would not overlap with other construction activities. During this two-month excavation activity, noise levels would fluctuate, and depending on equipment usage and location, construction-related noise level increases would fall below the +10 dBA impact standard for portions of the two months.

During excavation for Center Building A (preliminarily identified under Phase 2 excavation), sound levels at Receptor R4 (north end of Laurel Street) would increase by 10 dBA over existing sound levels, resulting in significant noise impacts. The excavation component of this phase of the construction program is anticipated to last for a total duration of approximately one month and, under the preliminary construction phasing schedule, would overlap with building (structure) construction of the Euclid Building (preliminarily identified under Phase1 building construction). However, increases of 10 dBA would not be expected to occur at all times during this phase of the construction program and such increases would only be expected during overlap between excavation for Center Building A (preliminarily identified under Phase 2 excavation) and building (structure) construction for the Euclid Building (preliminarily identified under Phase 1 building construction). During this one-month period of overlap of excavation for Center Building A and construction of the Euclid Building, as identified in the preliminary phasing schedule, construction noise levels would fluctuate, and depending on equipment usage and location, construction-related noise level increases would fall below the +10 dBA impact standard for portions of the period.

During excavation for the Plaza A Building (preliminarily identified under Phase 3 excavation), sound levels at Receptor R4 (north end of Laurel Street near Mayfair Drive) would increase by 14 dBA over existing sound levels, resulting in significant noise impacts. The excavation component of this phase of the construction program is anticipated to last for a total duration of approximately seven months, and under the preliminary construction phasing schedule, and would overlap during the first month of Center Building A building construction (preliminarily identified under Phase 2 building construction), and would also overlap during the last month of Plaza A Building foundation work (preliminarily identified under Phase 3 foundation). However, increases of 14 dBA would not be expected to occur at all times during this phase of the construction program and such increases would only be expected when the above overlapping activities are located in the western portion of the overlapping footprints. During this seven-month excavation activity, noise levels would fluctuate, and depending on equipment usage and location, construction-related noise level increases would fall below the +10 dBA impact standard at some times.

During building (structure) construction of the Laurel Duplexes and Mayfair Building (preliminarily identified under Phase 4 building construction), sound levels at Receptors R3 and R4 (Laurel Street) would increase by 13 dBA and 11 dBA, respectively, over existing sound levels, resulting in significant noise impacts. The building (structure) construction component of this phase of the construction program is anticipated to last for a total duration of approximately six months. During this six-month building construction activity, noise levels would fluctuate, and depending on equipment usage and location, construction-related noise level increases would fall below the +10 dBA impact standard at some times.

Mitigation Measure M-NO-1, pp. 4.D.42-4.D.43, includes the requirement to prepare a Noise Control Plan and implement noise control measures that would be employed during excavation of all phases, during building construction of the Laurel Duplexes and Mayfair Building (preliminarily identified as Phase 4 building construction), and during building construction of the Euclid and Masonic Buildings (preliminarily identified as Phase 1 building construction), to minimize the potential for noise impacts at residences along Laurel Street to the maximum extent feasible. However, the certainty of the construction noise reductions due to implementation of reduction strategies identified in Mitigation Measure M-NO-1 are not assured; thus, the impact would remain significant and unavoidable with mitigation.

California Street

At noise-sensitive receptors located on the north side of California Street, represented by Receptor R5, construction-related noise level increases would be 10 dBA over existing ambient conditions during excavation for Plaza A and Plaza B (preliminarily identified under Phase 3 excavation), resulting in a significant noise impact. The excavation component of this phase of the construction program is anticipated to last for a total duration of approximately seven months and would overlap with building (structure) construction of Center Buildings A and B (preliminarily identified under Phase 2 building construction) during the first month, and would overlap with the foundation phase of the Plaza A, Plaza B, and Walnut buildings (preliminarily identified under Phase 3 foundation) during the last month. During this seven-month excavation activity, noise levels would fluctuate, and depending on equipment usage and location, construction-related noise level increases would fall below the +10 dBA impact standard during portions of the seven months.

The loudest construction activity nearest California Street at the noise-sensitive receptors represented by Receptor R6 (north side of California Street near Presidio Avenue) would occur when excavation and foundation activities at the Walnut Building overlap (preliminarily identified under Phase 3 excavation and foundation, respectively). The overlap of excavation and foundation activities for the Walnut Building would occur during the last month of the seven-month duration of the excavation activities for the Plaza A, Plaza B, and Walnut buildings. Noise-sensitive receptors represented by Receptor R6 may experience increases of 9 dBA over ambient noise levels, resulting in a less-than-significant noise impact.

Mitigation Measure M-NO-1, pp. 4.D.42-4.D.43, includes the requirement to prepare a Noise Control Plan and implement noise control measures that would be employed during the excavation component of Plaza A, Plaza B, and the Walnut buildings (preliminarily identified under Phase 3 excavation), when occurring along California Street, to reduce the potential for noise impacts to below the +10 dBA standard. However, the certainty of the construction noise reductions due to implementation of reduction strategies identified in Mitigation Measure M-NO-1 is not assured; thus, the impact would remain significant and unavoidable with mitigation.

Presidio Avenue

At the hotel and residences east of Presidio Avenue, represented by Receptors R7 and R8, respectively, increases over ambient conditions would be less than 10 dBA during all phases of the four-phase construction program. The loudest construction activity nearest Presidio Avenue would occur during excavation activities for the Masonic Building (preliminarily identified under Phase 1 excavation) when occurring near the eastern portion of the Masonic Building footprint (see Figure 4.D.2, p. 4.D.13). Receptors along the east side of Presidio Avenue may experience increases of up to 5 dBA over ambient noise levels, resulting in a less-than-significant noise impact.

Construction Noise Impacts at Onsite Receptors

Onsite noise-sensitive receptors would include residential dwellings (in all-new and renovated buildings) and a daycare center in the proposed Walnut Building. The same set of onsite noise-sensitive receptors would also be part of the project variant except that residential dwellings would be included in the proposed Walnut Building along with the daycare center.

Generation of Noise Levels in Excess of City Noise Ordinance Limits

As identified on p. 4.D.36, the noise limit for non-impact construction equipment, as summarized in section 2907(a) of the noise ordinance, is 80 dBA when measured at a distance of 100 feet from the source. The assessment of compliance with section 2907 at onsite receptors is identical to the assessment for offsite receptors. That is, noise levels from construction equipment were calculated at a distance of 100 feet from individual equipment and compared with City's limit. As indicated on p. 4.D.36, noise levels used for this evaluation were based on the highest (i.e., peak) L_{eq} noise levels during any one hour, assuming continuous equipment operation.

As indicated on p. 4.D.36, excavation would be the loudest construction activity, and the loudest piece of non-impact equipment during excavation activities would be a loader or backhoe, both of which emit an hourly L_{eq} of 78 dBA at a distance of 100 feet (assuming continuous operation over an hour). Loader/backhoe equipment would comply with section 2907 of the noise ordinance, which limits noise levels to 80 dBA at 100 feet. Therefore, impacts related to compliance with local standards related to construction noise from non-impact equipment at onsite receptors would be less than significant.

Although noise from construction equipment is expected to comply with section 2907(a) of the noise ordinance, it would be noticeable to nearby onsite receptors. Construction noise reduction strategies identified under Mitigation Measure M-NO-1, pp. 4.D.42-4.D.43, which would include the requirement to prepare a Noise Control Plan and implement noise control measures during project construction, would further reduce the less-than-significant noise impacts related to compliance with local standards for construction noise from non-impact equipment.

Generation of Combined Construction Equipment Noise levels in Excess of the Federal Transit Administration Assessment Criteria at Onsite Receptors

Construction noise levels at onsite receptors, i.e., residential and daycare uses in the proposed new and renovated buildings, are summarized in Table 4.D.14: Onsite Construction Noise Levels and Compliance with Federal Transit Administration Criteria. The highest noise levels of onsite construction were determined by evaluating the loudest construction activity of each phase of the construction program at the nearest occupied onsite building constructed during an earlier phase, and comparing these estimated levels against the same Federal Transit Administration criterion defined on p. 4.D.25, i.e., 90 dBA at residential receptors during daytime hours.

Table 4.D.14: Onsite Construction Noise Levels and Compliance with Federal Transit Administration Criteria

Project Building		**Estimate of Noise Level, by Phase** NOTES A, B, C, D, E, F		
Name	**Phase**	**Phase 2**	**Phase 3**	**Phase 4**
Euclid Building	1	78	69	80
Masonic Building	1	77	69	69
Center Building A	2	-	75	78
Center Building B	2	-	76	70
Plaza A Building	3	-	-	78
Plaza B Building	3	-	-	74
Walnut Building	3	-	-	69

Notes:

[A] Order and duration of overlapping phases are considered preliminary; however, variations in phasing would not substantially change the magnitude or severity of any impact.

[B] Based on simultaneous operation of the loudest two pieces of construction equipment (occurs during excavation), including both impact and non-impact equipment, that could operate at the same time. Assumed continuously over a one-hour period, and therefore considered a conservative assessment of construction noise levels.

[C] Based on distance measured from the center of nearest building being constructed to façade of occupied building. Phase 1 not shown because onsite receptors would not exist until Phase 2 construction.

[D] Sound levels are considered conservative estimates for each construction phase, as received at each project building because only the loudest construction sources are assumed to operate continuously and at full capacity.

[E] Additional construction activities that would occur simultaneously during excavation would be farther from the onsite receptor that would be affected by excavation noise, and would contribute negligibly to the overall levels received at the affected receiver.

[F] A dash (“-”) indicates that the building would either be under construction or planned for a later phase and would not have been occupied during the phase in question.

Source: Ramboll 2018

For some building and phase combinations there are no estimates of onsite construction noise because the particular buildings would not have yet been constructed and occupied. As shown in Table 4.D.14, the estimated construction noise levels at all onsite receptors would be less than 90 dBA and would be less than significant. (See Table NO-6 in EIR Appendix E for supporting calculations.) Regardless, the construction noise control measures, identified in Mitigation Measure M-NO-1 (pp. 4.D.42-4.D.43), that would be part of the required Noise Control Plan and employed during excavation and building construction activities for the four phases of the construction program would further reduce less-than-significant construction noise levels at new residential receptors.

Generation of a Substantial Temporary Increase in Onsite Noise Levels

As identified on pp. 4.D.37 and 4.D.25, a significant impact would be expected if construction activities resulted in a persistent increase over the ambient daytime L_{eq} of 10 dBA or more. Future onsite sound levels are not yet known and will be based on a number of factors, including levels of traffic noise received at onsite receptors within the project site, the noise shielding effect of intervening buildings, and noises generated by use of the project buildings including traffic, commercial activities, and residential activities. Regardless of future ambient sound levels, it can be reasonably assumed based on the estimated sound levels for off-site receptors, that during construction of subsequent phases of the four-phase construction program, there would be periodic increases over ambient daytime noise levels of 10 dBA or more at onsite receptor locations, which would be a significant impact. Mitigation Measure M-NO-1 (pp. 4.D.42-4.D.43) would include the requirement to prepare a Noise Control Plan and implement noise control measures to reduce construction noise impacts at new onsite residential and daycare receptors. This measure would reduce noise levels during construction, however, the impact would remain significant and unavoidable with implementation of Mitigation Measure M-NO-1.

Project Variant

The calculated construction noise levels of the project variant would be expected to be the same as or similar to those for the proposed project. Calculated construction noise levels for the proposed project and project variant are below both the noise limits identified in the noise ordinance and the guideline impact criteria identified by the Federal Transit Administration. As with the proposed project, construction noise levels are expected to increase by 10 dBA or more along Euclid Street, Laurel Street, and California Street, as well as at future onsite receptor locations, resulting in significant noise impacts. Implementation of Mitigation Measure M-NO-1 (pp. 4.D.42-4.D.43) would include the requirement to prepare a Noise Control Plan and implement noise control measures that would reduce the potential for construction noise impacts; however, the impact would remain significant and unavoidable for both the proposed project and project variant with implementation of Mitigation Measure M-NO-1.

Offsite Haul Traffic

Approximately 288,000 cubic yards of soil and debris in total would be hauled away from the site during the excavation and demolition activities of the four phases of the construction program, resulting in a maximum of 80 round trips per day (160 one-way trips), including both off-haul of excavated soil and demolition spoils. For purposes of the noise analysis, these haul trips were allocated to the demolition and excavation components of each phase of the construction program plus two material/vendor trips per day for the duration of each phase. The analysis also includes a total of up to 50 concrete trucks per day required for pouring of concrete foundations during the foundation components of each phase of the construction program.[36,37] Excavation and demolition activities, over an assumed seven-year construction period, would occur for a combined total of approximately 2 years (or 24 months, with approximately 8 months for Phase 1, 5 months for Phase 2, 8 months for Phase 3, and 3 months for Phase 4, based on the preliminary construction phasing schedule [see Table NO-5 in EIR Appendix E]). However, during these periods at the beginning of each phase of the construction program, haul traffic would not be at maximum capacities at all times. Changes to the order of construction phases, or the duration of construction phases and thus a potential reduction in the number of trucks per day, would result in identical volumes of traffic as identified above, or potentially less, respectively.

As discussed in Section 4.C, Transportation and Circulation, pp. 4.C.68-4.C.70, construction of the proposed project or project variant, including construction hauling and concrete pour logistics, would be required to comply with Blue Book regulations and any needed special traffic permits. The number of inbound and outbound construction trucks would vary by phase and, depending on the phase, would use California Street, Pine Street, Bush Street, a portion of Presidio Avenue, and Masonic Avenue to Geary Boulevard, and Euclid Avenue. Along these routes, the average daily increase in traffic would be minor, comprising less than 2 percent of daily traffic. Assuming demolition and excavation haul trips are evenly distributed between 7:00 a.m. and 7:00 p.m., traffic-related noise levels may increase by up to 1 dBA during construction.[38] During most days, hauling activity is expected to occur between 7:00 a.m. and 3:30 p.m. Assuming the same number of trucks per day, traffic-related noise levels may increase by up to 1.4 dBA during these daytime hours, which is not a perceptible change (see EIR Appendix E, Tables NO-7 and NO-8). During concrete pouring, assuming concrete truck trips are evenly distributed between 7:00 a.m. and 3:30 p.m., traffic-related noise levels may increase by up to 2.0 dBA (0.6 dBA higher than without concrete trucks), which also is not a perceptible change (see EIR Appendix E, Tables NO-7 and NO-8). It is anticipated that the proposed project's or project variant's construction-related truck trips would travel on city-designated truck routes to minimize impacts related to construction traffic with primary access to and from the project site provided from California Street and Presidio and Masonic avenues, with fewer construction-related vehicles entering the project site

[36] Based on total number of concrete trucks anticipated per phase, divided by total individual concrete pouring days by phase. Total concrete trucks anticipated for Phases 1, 2, 3, and 4 are 2,500, 500, 3,500, and 400, respectively. Total concrete pouring days for Phases 1, 2, 3, and 4 are 50, 15, 70, and 12, respectively. Therefore, total additional concrete trucks during concrete pouring for Phases 1, 2, 3, and 4 are 50, 33, 50, and 33, respectively (e.g., for Phase 1: 2,500 divided by 50 pouring days equals 50 trucks per day).

[37] Bell, Joe, Webcor Builders, e-mail correspondence with Peter Mye at SWCA regarding construction information data, September 14, 2017.

[38] Existing hourly traffic distribution based on existing noise measurements and assuming 98 percent light duty vehicles and 2 percent heavy duty vehicles. Noise levels calculated using the TNM Lookup tool (described under "Traffic" subheading, p. 4.D.27).

from Euclid Avenue and Laurel Street.[39] Considering that the noise would increase by a maximum of 2.0 dBA along haul truck routes identified above, these noise levels would not result in a perceptible change in noise levels, and therefore noise impacts from temporary traffic increases from haul truck trips would be less than significant. Changes to the order of construction phases, or the duration of construction phases and thus a potential reduction in the number of trucks per day, would result in identical sound level increases, or potentially smaller increases, respectively.

Impact NO-2: Construction of the proposed project or project variant would expose structures to, or generate excessive groundborne vibration levels, but not excessive groundborne noise. (*Less than Significant with Mitigation)*

Groundborne Noise

Vibration in buildings caused by construction activities may be perceived as motion of building surfaces or rattling of windows, items on shelves, and pictures hanging on walls. Vibration of building components can also take the form of an audible low-frequency rumbling noise, which is referred to as groundborne noise. Groundborne noise is usually only a problem when the originating vibration spectrum is dominated by frequencies in the upper end of the range of vibration frequencies (i.e., 60 to 200 Hertz), when the structure and the construction activity are connected by foundations or utilities, such as sewer and water pipes, or when the airborne noise path is blocked, such as during tunneling activities. Construction activities related to the proposed project or project variant, including excavation activities where the highest levels of vibration are anticipated, would not include vibration of foundations or utilities that are connected to existing structures, and would not include tunneling operations. Therefore, impacts due to groundborne noise would be less than significant.

Groundborne Vibration

As indicated in the methodology discussion under "Vibration" on pp. 4.D.30-4.D.31, the performance standards that have been applied to identify potentially significant vibration impacts include construction-related groundborne vibration levels that exceed the Caltrans perceptibility and structural damage standards. A "strongly perceptible" level of 0.1 in/sec PPV or higher at existing offsite and future onsite sensitive receptors, during nighttime hours, would exceed the perceptibility standard.

Under the Caltrans guidelines, vibration level standards for structural damage are based on the building classes identified in Table 4.D.6, p. 4.D.17 (i.e., continuous or frequent intermittent

[39] Construction trucks would follow the routes identified in the Vehicles and Parking – Truck Routes section of the SF Transportation Information Map, http://www.sftransportationmap.org/, accessed June 12, 2018.

sources of vibration that exceed 0.25 in/sec PPV for historic or older buildings, 0.3 in/sec PPV for older residential structures, and 0.5 in/sec PPV for new residential structures or modern industrial/commercial buildings).[40] Lower standards exist for extremely fragile or fragile buildings; however, those types of buildings are not present in the project site vicinity or on the project site.

As summarized in Table 4.D.10, p. 4.D.31, vibratory rollers are expected to produce the highest levels of groundborne vibration. Vibratory rollers would be used during paving activities in all phases of the construction program. Vibration levels from all other equipment, including impact equipment such as a hoe ram (used for bedrock fragmentation), would generate lower levels of groundborne vibration. Vibration levels due to use of vibratory rollers were calculated at each of the nearest existing offsite receptors and structures, as well as at existing and future onsite receptors structures. Results of these calculated vibration levels were then compared to the Caltrans perceptibility and structural damage guidelines.

Groundborne Vibration Impacts at Offsite Receptors

Groundborne vibrations from construction have the potential to affect the existing offsite receptors nearest to the project site such as the residential land uses on the east side of Presidio Avenue (represented by Receptor 8 on Figure 4.D.2, p. 4.D.13) and the west side of Laurel Street (represented by Receptors R3 and R4 in Figure 4.D.2).

Table 4.D.15: Maximum Anticipated Construction Groundborne Vibration Levels at Offsite Sensitive Receptors summarizes the highest potential groundborne vibration, based on construction-related groundborne vibration levels predicted for each phase of the construction program, and based on distance to the nearest existing offsite sensitive receptors. Results are based on vibration emissions from a vibratory roller, which would be used periodically during the paving operations that would occur for several days during each phase. Vibration levels estimated for all offsite sensitive receptors are expected to be below 0.1 in/sec PPV, the level considered to be "strongly perceptible."

At the offsite residential receptor nearest to construction activity in Phase 3 (the residential land uses on the east side of Presidio Avenue, represented by Receptor 8, and the west side of Laurel Street, represented by Receptors R3 and R4), vibration levels would not exceed the perceptibility standard during use of the vibratory roller. Therefore, impacts to offsite sensitive receptors related to groundborne vibration from vibratory equipment use would be less than significant.

[40] As indicated in Table 4.D.6 (p. 4.D.17), the structural damage guidelines cited refer to vibration from continuous/intermittent operation of such equipment as vibratory rollers and a hoe ram.

Table 4.D.15: Maximum Anticipated Construction Groundborne Vibration Levels at Offsite Sensitive Receptors

Phase	Const. Equip.	PPV at 25 Feet (in/sec) NOTE A	Nearest Structures		PPV at Nearest Structure (in/sec)	Standard for Strongly Perceptible (PPV) NOTE C	Exceeds Standard?
			Representative Receptors	Distance (feet) NOTE B			
1	Vib. Roller	0.210	R1	120	0.02	0.1	No
2			R8	155	0.01		No
3			R5, R6	60	0.06		No
4			R3, R4	65	0.05		No

Notes:

[A] Based on operation of a vibratory roller, anticipated to generate the highest levels of vibration during all phases of the construction program. See Table 4.D.10 (p. 4.D.31) for a summary of vibration levels by equipment type.

[B] Based on Federal Transit Administration Transit Noise and Vibration Impact Assessment (May 2006). Calculation of PPV at distance is: PPV(distance) = PPV(ref) x $[(\text{Ref distance})/(\text{Distance to receiver})]^{1.5}$; see calculation detail in Table NO-9 in EIR Appendix E.

[C] Based on Caltrans, Transportation and Construction Vibration Guidance Manual, September 2013, Table 20, p. 38. See Table 4.D.5: Vibration Guidelines for Annoyance, p. 4.D.17.

Source: Ramboll, 2018

Groundborne Vibration Impacts at Offsite Structures

The buildings in the vicinity of the project site vary according to their structure type, age and condition. Older wood frame residential structures are located 60 to 155 feet from the project site along Presidio Avenue, Euclid Avenue and Laurel Street. The SF Fire Credit Union, which is located at the southwest corner of the California Street/Presidio Avenue intersection, is a newer commercial building that would be directly adjacent to construction activities on the project site. All other offsite structures would be located far enough from the project site construction activities to not be susceptible to structural damage, as shown in Table 4.D.16: Maximum Anticipated Construction Groundborne Vibration Levels at Offsite Structures. The SF Fire Credit Union building does not house sensitive receptors potentially subject to sleep interference but is located close enough to the construction site to be evaluated for potential structural damage.

Table 4.D.16 summarizes the highest potential construction-related groundborne vibration levels predicted for each phase of the construction program, based on distance to the nearest existing offsite structures. Results in Table 4.D.16 are based on vibration emissions from a vibratory roller. Vibration levels estimated for all offsite buildings are expected to be well below the structural damage standard of 0.25 in/sec PPV for historic or some old buildings and 0.3 in/sec PPV for older residential structures.

Table 4.D.16: Maximum Anticipated Construction Groundborne Vibration Levels at Offsite Structures

Phase	Const. Equip.	PPV at 25 Feet (in/sec) NOTE A	Nearest Structures		PPV at Nearest Structure (in/sec) NOTE B	Standard for Structural Damage (PPV) NOTE C	Exceeds Standard?
			Representative Receptors	Distance (feet)			
1	Vib. Roller	0.210	R1	120	0.02	0.3	No
2			R8	155	0.01		No
3			R5, R6 NOTE D	60	0.06		No
4			R3, R4	65	0.05		No

Notes:

[A] Based on operation of a vibratory roller, anticipated to generate the highest levels of vibration during all phases of the construction program. See Table 4.D.10 (p. 4.D.31) for a summary of vibration levels by equipment type.

[B] Based on Federal Transit Administration Transit Noise and Vibration Impact Assessment (May 2006). Calculation of PPV at distance is: PPV(distance) = PPV(ref) x [(Ref distance)/(Distance to receiver)]$^{1.5}$; see calculation detail in Table NO-9 in EIR Appendix E.

[C] Based on Caltrans, Transportation and Construction Vibration Guidance Manual, September 2013, Table 19, p. 38. See Table 4.D.6: Vibration Guidelines for Potential Damage to Structures, p. 4.D.17.

[D] Represents only Receptors R5 and R6, and does not represent Phase 3 construction activities that would occur within 20 feet of the SF Fire Credit Union building on the southwest corner of California Street and Presidio Avenue. See Table 4.D.17 (p. 4.D.55) for a summary of potential worst-case vibration levels near the SF Fire Credit Union.

Source: Ramboll, 2018

As identified in Table 4.D.16, most offsite structures, including historic buildings and some older buildings along Presidio Avenue and Masonic Avenue, and older residential structures along Euclid Avenue and Laurel Street, and newer residential and commercial structures along California Street, would be too distant from the proposed construction activities on the project site to be susceptible to structural damage.

As defined in Table 4.D.6, p. 4.D.17, structural damage at modern industrial/commercial buildings such as the SF Fire Credit Union may occur when vibration levels reach 0.5 PPV. Structural damage includes a range of damage, from cosmetic (e.g., paint cracking or peeling) to substantial foundational or building damage such as cracks in concrete or wall materials and shifting of structures or utilities. Heavy construction equipment, such as excavators operating as near as 5 feet to the SF Fire Credit Union building foundation, could result in structural damage because levels may exceed 0.5 in/sec PPV. Vibratory rollers are not expected to operate within close proximity to the SF Fire Credit Union building. Table 4.D.17: Maximum Anticipated Construction Groundborne Vibration Levels at SF Fire Credit Union Building provides a summary of the potential vibration levels from an excavator operating as near as 5 feet from the SF Fire Credit Union building. Table 4.D.17 also identifies the minimum distance at which structural damage would not be expected from excavator use, which is 8 feet.

Table 4.D.17: Maximum Anticipated Construction Groundborne Vibration Levels at SF Fire Credit Union Building

Phase	Construction Equipment	PPV at 25 Feet (in/sec) [NOTE A]	Distance to Nearest Structure (feet)	PPV at Nearest Structure (in/sec) [NOTE B]	Standard for Structural Damage (PPV) [NOTE C]	Exceeds Standard?
3	Excavator [NOTE A]	0.089	5	1.0	0.5	Yes
			8 [NOTE D]	0.49		No

Notes:

[A] Based on operation of an excavator, anticipated to generate the highest levels of vibration during Phase 3 construction nearest the SF Fire Credit Union building. See Table 4.D.10 (p. 4.D.31) for a summary of vibration levels by equipment type. Excavators are considered to emit vibration levels similar to large bulldozers for the purposes of this assessment.

[B] Based on Federal Transit Administration Transit Noise and Vibration Impact Assessment (May 2006). Calculation of PPV at distance is: PPV(distance) = PPV(ref) x [(Ref distance)/(Distance to receiver)]$^{1.5}$; see calculation detail in Table NO-9 in EIR Appendix E.

[C] Based on Caltrans, Transportation and Construction Vibration Guidance Manual, September 2013, Table 19, p. 38. See Table 4.D.6:Vibration Guidelines for Potential Damage to Structures, p. 4.D.17,.

[D] Eight feet has been identified as the distance beyond which structural damage would not occur from continuous use of an excavator near the offsite structure.

Source: Ramboll, 2018

As summarized in Table 4.D.17, excavators used during Phase 3 excavation work have the potential to cause structural damage at the nearest offsite structure, the SF Fire Credit Union building, when operating within 8 feet of this building. Therefore, Mitigation Measure M-NO-2: Vibration Monitoring Program for SF Fire Credit Union Building describes measures that would be required to ensure that structural damage impacts at the SF Fire Credit Union building would not occur.

Mitigation Measure M-NO-2: Vibration Monitoring Program for SF Fire Credit Union Building

Prior to excavation activities along California Street, including for the Walnut Building and California Street Garage, a detailed vibration assessment and monitoring plan shall be completed to ensure that construction activities and equipment are selected and designed to ensure groundborne vibration levels at the SF Fire Credit Union do not exceed levels protective of the structural integrity of the building.

The project contractor shall:

- Retain the services of a qualified structural engineer or vibration consultant to prepare a pre-construction building assessment and vibration monitoring plan of the SF Fire Credit Union building.
- Prior to excavation activities for the Walnut Building and the California Street Garage, perform inspection of the SF Fire Credit Union building to document existing building conditions with written and photographic descriptions of the existing condition of visible exteriors and in interior locations upon permission of the owner. The assessment shall determine specific locations to be monitored and include

annotated drawings to locate digital photo locations, survey markers, and/or other monitoring devices to measure vibrations. Based on the construction program for the proposed project or project variant and the condition of the SF Fire Credit Union building, the structural engineer and/or vibration consultant shall develop a vibration monitoring plan to protect the SF Fire Credit Union building. The pre-construction assessment and vibration monitoring plan shall be submitted to the Planning Department prior to issuance of construction permits for excavation for the Walnut Building and the California Street Garage.

- Inform the SF Fire Credit Union of upcoming construction activities that may generate high levels of vibration, including excavator use that may occur within 15 feet of this building (thereby providing a 7-foot protective buffer to the 8-foot distance where damage may occur).
- Perform vibration monitoring at the SF Fire Credit Union building during excavation activities for the Walnut Building and the California Street Garage when operating heavy equipment (i.e., excavators) within 15 feet of the building foundation. Vibration monitoring shall be conducted on a daily basis, as needed, when heavy equipment operates within 15 feet of the building foundation. When vibration levels exceed allowable threshold the Construction Manager, structural engineer, or other designated person(s) shall be alerted.
- Should the measured vibration levels at the SF Fire Credit Union building during excavation for the Walnut Building and the California Street Garage exceed 0.5 PPV (in/sec) at any time, or if damage to the SF Fire Credit Union building is observed, construction personnel shall immediately cease excavation and implement vibration control measures such as adjustment of excavation methods to reduce vibration of soil or use of equipment that generates lower levels of vibration. Examples of equipment that may generate lower levels of vibration may include smaller sized back-hoes.
- If damage to the SF Fire Credit Union building occurs, the building shall be remediated to its pre-construction condition at the conclusion of ground-disturbing activity, as shown in the pre-construction assessment, with the consent of the building owner.

Plan Review, Implementation, and Reporting

The Detailed Vibration Assessment Plan shall be reviewed and approved by the San Francisco Planning Department prior to implementation. Vibration measurements shall be completed by a qualified structural engineer or vibration consultant.

A vibration monitoring log report is to be prepared by the Construction Manager or other designated person(s) on a weekly basis during excavation for the Walnut Building and California Street Garage, and shall be made available to the Planning Department Development Performance Coordinator and building department when requested. A final report on the vibration monitoring shall be submitted to the Planning Department following completion of Walnut Building and California Street Garage excavation and prior to the issuance of a Certificate of Occupancy. The report shall document vibration levels, exceedances of the threshold level, if reported, and corrective action(s) taken.

Implementation of Mitigation Measure M-NO-2 would ensure that construction vibration impacts related to the proposed project or project variant would be reduced to a less-than-significant level.

Groundborne Vibration Impacts at Onsite Receptors

Table 4.D.18: Maximum Anticipated Construction Groundborne Vibration Levels at Onsite Receptors summarizes the highest potential construction-related groundborne vibration levels estimated for each phase of the construction program, based on distance to the nearest existing and future onsite receptors. Similar to the assessment for offsite sensitive receptors, results in Table 4.D.18 for onsite sensitive receptors are based on vibration emissions from a vibratory roller because all other equipment would generate lower levels of vibration when operating nearest these onsite sensitive receptor buildings.

Table 4.D.18: Maximum Anticipated Construction Groundborne Vibration Levels at Onsite Receptors

Phase	Construction Equipment	PPV at 25 Feet	Potential Distance to Nearest Receptor (feet)	PPV at Nearest Receptor (in/sec) NOTE A	Standard for Strongly Perceptible (PPV) NOTE B	Exceeds Standard?
All	Vibratory Roller	0.210 NOTE C	20	0.29	0.1	Yes

Notes:

[A] Based on Federal Transit Administration Transit Noise and Vibration Impact Assessment (May 2006). Calculation of PPV at distance is: PPV(distance) = PPV(ref) x [(Ref distance)/(Distance to receiver)]$^{1.51}$; see calculation detail in Table NO-9 in EIR Appendix E.

[B] Based on Caltrans, Transportation and Construction Vibration Guidance Manual, September 2013, Table 20, p. 38. See Table 4.D.5: Vibration Guidelines for Annoyance, p. 4.D.17.

[C] Based on operation of a vibratory roller, anticipated to generate the highest levels of vibration during all phases of the construction program.

Source: Ramboll, 2018

New onsite sensitive receptors at the project site could potentially be exposed to high levels of onsite groundborne vibration generated by nearby or adjacent construction-related vibratory activities. These onsite receptors include the following:

- Residents of the Masonic and Euclid buildings, constructed in Phase 1 (based on the preliminary construction schedule) and exposed to construction vibration during limited demolition and construction activities associated with the adaptive reuse of the remaining portion of the existing office building as Center Buildings A and B (preliminarily identified under Phase 2), and during limited excavation and construction activities associated with the Laurel Duplexes and Mayfair Building (preliminarily identified under Phase 4);
- Residents of Center Buildings A and B, constructed in Phase 2 (based on the preliminary construction schedule) and exposed to construction vibration during construction of the Plaza A, Plaza B, and Walnut buildings (preliminarily identified under Phase 3); and
- Residents of the Plaza A and Plaza B buildings exposed to construction vibration during construction of the Laurel Duplexes and Mayfair Building in Phase 4 (based on the preliminary construction schedule).

Construction vibration levels could exceed the “strongly perceptible” standard level of 0.1 in/sec PPV when using a vibratory roller within 20 feet of any newly occupied buildings. However, construction activities occurring within 20 feet of any occupied onsite building would be short-term in nature and occur during daytime hours only. Specifically, as indicated above, vibratory rollers, which would result in the highest levels of potential groundborne noise, would be used only for periods of several days at any one time in advance of paving activities. As no nighttime construction activities, including paving, are proposed, vibration effects from the use of a vibratory roller would not be expected to disturb sleep. Thus, impacts to onsite sensitive receptors related to groundborne vibration from vibratory equipment use would be less than significant.

As discussed above, a vibratory roller (typically the piece of construction equipment that generates the most vibratory effects) was used as the proxy to conservatively estimate the level of groundborne vibration that would be experienced at offsite and onsite receptor locations. Based on this assessment, impacts to existing offsite and new onsite sensitive receptors related to groundborne vibration from vibratory equipment use would be less than significant. No mitigation is necessary; however, with implementation of the Mitigation Measure M-NO-2 (pp. 4.D.55-4.D.56), management of the vibratory compaction equipment, as well as excavators, could result in the minimization of any temporary, yet perceptible, disturbance or annoyance generated by the construction activities for the proposed project or project variant.

Project Operation

Impact NO-3: Operation of the proposed project or project variant would not result in a substantial permanent increase in ambient noise levels in the immediate project vicinity, or permanently expose persons to noise levels in excess of standards in the San Francisco General Plan and the San Francisco Noise Ordinance. (*Less than Significant with Mitigation)*

Operation of the proposed project or project variant would generate relatively low levels of operational noise in the immediate vicinity of the project site. Noise from operation of air handling and other mechanical equipment, various building support services, and onsite traffic would be typical, both in level and in character, of noises commonly generated in a busy urban environment.

Stationary equipment associated with the proposed project or project variant includes HVAC systems, cooling towers, an emergency generator, ventilation systems, and trash compactors.

Cooling Equipment

Noise levels from HVAC system equipment vary and generally depend on equipment make/model and the size (capacity) of the HVAC system unit. Noise from typical commercial-scale HVAC system units can range from approximately 65 dBA to 75 dBA at 50 feet.[41] At the time of this assessment, details regarding proposed project or project variant HVAC system equipment were not known. However preliminary details suggest that such equipment would be located on the rooftops of project buildings. (See Chapter 2, Project Description, "Proposed Project Components", pp. 2.26-2.61.)

Cooling towers often can emit high levels of noise that range between approximately 70 to 85 dBA at a distance of 50 feet.[42] Preliminary project details show that a cooling tower would be located on the roof of Center Building B. (See Chapter 2, Project Description, "Proposed Project Components", p. 2.35.)

Assuming a conservative attenuation level of 20 dBA with windows closed (i.e., 20 dBA reduction of exterior noise), to ensure that indoor noise levels do not exceed the Title 24 noise standard of 45 dBA, HVAC system equipment must not exceed 65 dBA at a distance of 50 feet, and also must not be located closer than 50 feet from a noise-sensitive receiving window. Similarly, cooling towers must not exceed 75 dBA at a distance of 50 feet, and must be placed at least 150 feet from a noise-sensitive receiving window. Thus, it is possible that HVAC and cooling equipment at the proposed project buildings could result in excessive noise and Mitigation Measure M-NO-3: Stationary Equipment Noise Controls has been identified to reduce project-related effects on ambient noise conditions. Title 24 of the California Code of Regulations requires new residences to incorporate noise insulation to attenuate existing exterior noise such that interior noise levels are below 45 dBA L_{dn}.

As required by Mitigation Measure M-NO-3, stationary equipment would be subject to the Noise Ordinance (specifically, Section 2909[a], 2909[b], and 2909[d], which limits the project-related increase in noise to 5 dB and 8 dB for residential and commercial/industrial uses at the property line, respectively, and interior noise levels to 45 dBA between 10:00 p.m. and 7:00 a.m. and 55 dBA between 7:00 a.m. and 10:00 p.m.). Mitigation Measure M-NO-3 requires compliance with the Noise Ordinance through acoustical treatments to attenuate noise from stationary sources (e.g., installing enclosures or barriers around equipment, using quiet models of equipment, incorporating mufflers or silencers on exhaust fans, etc.) such that interior noise limits are met under both existing and future noise conditions, accounting for foreseeable changes in noise

[41] Based on multiple sound level measurements by Ramboll of HVAC system equipment of varying sizes, at various commercial or light industrial facilities. Ultimately, noise levels from cooling towers would depend on their cooling type (water versus air cooled), size, and rated capacity.

[42] Based on multiple sound level measurements by Ramboll of cooling towers of varying sizes, at various commercial or light industrial facilities.

conditions in the future (i.e., changes in onsite building configurations and locations of sensitive residential receptors). Acoustical treatments required by Mitigation Measure M-NO-3 would ensure that project equipment noise levels would comply with Police Code Section 2909 requirements with respect to both existing offsite and future onsite land uses. Therefore, with implementation of Mitigation Measure M-NO-3, potential noise impacts resulting from stationary equipment would be less than significant for onsite and off-site sensitive receptors.

Mitigation Measure M-NO-3: Stationary Equipment Noise Controls

Noise attenuation measures shall be incorporated into all stationary equipment (including HVAC equipment) installed on all buildings that include such stationary equipment as necessary to meet noise limits specified in Section 2909 of the Police Code. Interior noise limits shall be met under both existing and future noise conditions. Noise attenuation measures could include provision of sound enclosures/barriers, addition of roof parapets to block noise, increasing setback distances from sensitive receptors, provision of louvered vent openings, and location of vent openings away from adjacent residential uses.

Existing offsite receptors would be located farther from project-related cooling equipment than new onsite receptors and, with implementation of Mitigation Measure M-NO-3, noise from cooling equipment would result in less-than-significant impacts at existing offsite noise-sensitive receptors.

Therefore, impacts on existing and new sensitive receptors from onsite stationary equipment noise would be less than significant with implementation of Mitigation Measure M-NO-3.

Other Sources of Onsite Operational Noise

Noise from other onsite operational activities, including garbage trucks and delivery trucks operating above grade, as well as associated back-up alarms, miscellaneous clangs, horns, or related noises, may be audible at times to both existing offsite and new onsite noise-sensitive receptors. However, these noises would occur only for relatively short periods of time, would not be expected to occur frequently, and would be generally consistent with the character of noise typically associated with a busy urban area.

Additionally, as discussed under section 2904 of the police code, p. 4.D.18, noise emissions from the mechanical processing systems of waste collection vehicles is limited to a sound level limit of 75 dBA at a distance of 50 feet. Due to the close proximity of future onsite residential uses relative to potential garbage collection areas, noise from garbage collection within the project site should be limited to the City's limit of 75 dBA at a distance of 50 feet. Most on-site garbage collection activity would occur within Basement Levels B3 and B1 of the proposed off-street loading docks in the California Street and Masonic garages, respectively; therefore, noise from waste collection within the basement would be shielded by intervening walls. Off-site garbage collection that would occur along Laurel Street would emit noise that would be similar in character and scheduled frequency to existing garbage collection along this roadway.

As indicated, noise from garbage collection would be mostly contained within the loading docks at the basement levels of the California Street and Masonic garages, effectively shielding garbage collection noise from nearby residential uses and resulting in compliance with section 2904 of the police code. Adherence to the City's garbage collection noise performance standard would ensure compliance with section 2909(d) interior noise standards when operating during daytime hours. Conversely, garbage trucks that adhere to this limit also should be limited to daytime operation only. Garbage collection is not scheduled to occur onsite during nighttime hours.

Therefore, noise from these activities would not result in significant impacts and mitigation is not necessary.

Additional Equipment

A new 800-kW diesel emergency generator and 500-gallon fuel storage tank would be located in Basement Level B1 of the Masonic Building. The new emergency generator, as with the existing emergency generator, would be located below grade and would be completely shielded from existing and future noise-sensitive receptors. The exhaust for the generator would be vented to the roof of the building. Therefore, noise impacts during routine testing of the generator (i.e., approximately 50 hours over the course of a year) would be expected to be less than significant.

Trash compactors and loading docks would be located below grade within Basement Level B3 of the California Street Garage and Basement Level B1 of the Masonic Garage and would be shielded from exposure to nearby onsite and offsite uses. Noise from such equipment and activities would be expected to be either minimally audible or not audible.

Noise from Outdoor Use Areas

The proposed project and project variant would include the proposed Euclid Green, a landscaped green space at the northeast corner of Euclid Avenue and Laurel Street, extending partially down Euclid Avenue. In addition, the proposed project and project variant would include an outdoor courtyard at the northeast corner of the site that would be dedicated to the proposed daycare center in the Walnut Building. This space, as well as other open areas on the project site (including the proposed Euclid Green), may be used by children associated with the proposed onsite daycare center and residents of the project. Noise from use of these outdoor use areas, as well as any other spaces within the project site where people may gather, would be generated by unamplified human voices. However, activities at the open space areas would generate relatively low levels of noise. Such noise would not be subject to noise ordinance limits and would be consistent with the character of the existing neighborhood and generally would not result in sleep disturbance.[43] Therefore, noise from activities at the proposed outdoor use areas would not result in significant noise impacts, because it would not substantially increase ambient noise levels above existing conditions. No mitigation is necessary.

Impact NO-4: Operation of the proposed project and project variant would not cause substantial permanent increases in ambient noise levels along roadway segments in the project site vicinity. (*Less than Significant)*

As summarized above under "Methodology for Analysis of Operations", p. 4.D.27, to assess traffic noise impacts from the proposed project or project variant, traffic sound levels were calculated for existing traffic volumes and for the increased traffic volumes under existing plus the proposed project or project variant. According to the traffic volume analysis performed for the proposed project and project variant, traffic volumes would be lower with the project variant than with the proposed project; therefore, traffic sound levels would also be lower with the project variant than with the proposed project. Accordingly, the following analysis uses only the existing plus proposed project traffic information as the most conservative analysis. Twenty-four-hour sound levels (i.e., L_{dn}) were calculated using both average daily traffic volumes (ADT) along area roadways and hourly sound level data collected at long-term measurement locations (see Figure 4.D.1, p. 4.D.8).[44]

Operation of the proposed project would result in permanent increases in ambient noise levels along area roadways from project-related increases in traffic. Results of the off-site traffic noise analysis are summarized in Table 4.D.19: Project-Related Traffic Noise Levels Near Area Roadways.

Traffic composition, travel speeds, and receptor setback distances from each roadway segment were determined using the methodology described on p. 4.D.28. Details of traffic volumes, speed, and composition are summarized in Table NO-4 in EIR Appendix E.

[43] In general, noise from children is not considered a potential impact in San Francisco because (1) daycare, schools and playgrounds are common and necessary features of the urban environment, (2) unlike mechanical noise, child noise is not constant, but rises and falls over time; and (3) daycare noise occurs during the daytime hours and typically would not disturb sleep. Noise from children may be an annoyance to some nearby residences, but unless it is unusually loud (for example, a 10 dB increase or doubling of the existing ambient noise level) and constant, it would not represent a significant impact to the physical environment.

[44] Peak-period traffic volumes were calculated using (1) average daily traffic (ADT) data provided by Kittelson & Associates, and (2) temporal traffic patterns established using the long-term sound level measurement hourly L_{eq} data. To calculate the 24-hour L_{dn}, the p.m. peak to L_{dn} ratio derived from the measured sound levels was applied to the traffic noise model-calculated p.m. peak hourly sound level. Kittelson & Associates, Average Daily Traffic Volumes – Methodology and Results Memorandum, November 14, 2017. (See EIR Appendix F: Air Quality Calculation Details and Supporting Information.)

Table 4.D.19: Project-Related Traffic Noise Levels Near Area Roadways

Road Segment	Distance from Roadway to Nearest Structure (feet)	Land Use Compatibility Standard (dBA, L_{dn})	Existing (dBA, L_{dn})	Existing + Project (dBA, L_{dn})	Increase (dBA, L_{dn}) NOTE A
California Street west of Walnut Street	40	60	64	65	1
California Street between Walnut Street and Presidio Avenue	40	65	64	64	1
California Street east of Presidio Avenue	30	60	65	65	0
Laurel Street north of Mayfair Drive	45	65	59	60	1
Laurel Street south of Mayfair Drive	25	60	61	62	1
Euclid Avenue west of Masonic Avenue	50	60	63	63	0
Euclid Avenue between Masonic Avenue and Presidio Avenue	55	60	62	62	0
Euclid Avenue east of Presidio Avenue	30	60	64	64	0
Masonic Avenue north of Euclid Avenue	45	60	65	65	0
Masonic Avenue east of Presidio Avenue	20	60	69	69	0
Presidio Avenue north of California Street	50	60	60	61	1
Presidio Avenue south of California Street	40	60	61	61	1
Presidio Avenue south of Masonic Avenue	40	60	61	61	1
Masonic Avenue south of Euclid Avenue	50	60	65	65	0
Presidio Avenue south of Euclid Avenue	35	60	59	61	1

Note:
[A] Apparent calculation errors due to rounding of decimal values.

Source: Ramboll, 2018

The assessment included all roadways in the project vicinity where noise-sensitive receptor locations, including residences, hotels, schools, and daycare centers, may be subject to permanent increases in project-related traffic.

As shown in Table 4.D.19, traffic sound level increases along all area roadways would be 1 dBA or less with the proposed project. Traffic sound level increases with the project variant would be lower than with the proposed project. An increase of 1 dBA is acoustically negligible and would not be noticed in an active outdoor environment, such as along a busy roadway corridor within a mixed-use urban area.

Implementation of the proposed project or project variant would result in a less-than-significant impact related to traffic noise increases along roadway segments in the project site vicinity. No mitigation is necessary.

Impact NO-5: The proposed project's or project variant's occupants would not be substantially affected by future noise levels on the site. (*Less than Significant)*

The proposed project or project variant would introduce new noise-sensitive uses to a site that is exposed to noise conditions and levels that are typical of an active and dense urban area. The introduction of new stationary noise sources (i.e., HVAC systems, cooling towers, garbage collection) would exacerbate the existing noise environment. However, design and operation in accordance with the noise ordinance and implementation of performance standards for cooling equipment and garbage trucks, as summarized above under Impact NO-3 (pp. 4.D.58-4.D.62) and identified under Mitigation Measure M-NO-3 (p. 4.D.60), would ensure that the proposed project or project variant would not substantially alter ambient noise levels such that future occupants would be located within a noise environment that would be incompatible with the proposed uses.

Permanent noise increases at offsite receptors from operation of the proposed project or project variant would be due to increases in traffic noise. The increases in the ambient noise levels are summarized in Impact NO-4, pp. 4.D.62-4.D.64. As stated in Impact NO-4, and as summarized in Table 4.D.19, traffic noise impacts would be less than significant at all existing offsite receptors. Noise from project-generated traffic along roadways adjacent to the project site would also impact new noise-sensitive receptors within the project site. The following assessment therefore evaluates the potential impact of future traffic noise levels at these new noise-sensitive uses.

Future uses would include residential, commercial (office and retail), open space, and a daycare facility. Commercial (office and retail) uses and open space uses in urban areas are not considered to be sensitive to noise, and are not evaluated as part of this impact assessment. Future traffic noise levels at the new daycare and residential receptors were included in this assessment. To evaluate noise at future residential and daycare uses, existing traffic noise levels at these onsite receptor locations were compared with future traffic noise levels to determine if a significant impact would occur. In addition, to be conservative, the analysis takes into consideration traffic from reasonably foreseeable projects in the vicinity plus predicted regional traffic growth.[45] Traffic data

[45] Future traffic growth combined with future reasonably foreseeable projects are part of the cumulative future traffic noise condition that is evaluated in detail relative to existing offsite receptors under Impact C-NO-2, p. 4.D.71. The analysis presented here for project-related noise effects is conservative in that it accounts for more than project-generated traffic noise.

considered for this assessment include “Cumulative + Project” volumes, as summarized in Table NO-4 in EIR Appendix E.

The following assessment evaluates future sound levels at the façade of each new building that would be constructed for the proposed project or project variant,[46] accounting for increases in future traffic volumes due to the proposed project or project variant, to determine whether noise from project- or project variant-generated traffic would substantially exacerbate existing noise levels at onsite sensitive receptors. Traffic noise levels received at future onsite noise-sensitive receptors were estimated using traffic volumes for the nearest roadway (e.g., Euclid Avenue, Masonic Avenue, California Street, or Laurel Street), and the estimated setback from these roadways to the onsite receptor.

Table 4.D.20: Estimated Future Traffic Noise Levels at New Occupied Buildings summarizes each building that would contain a noise-sensitive use (i.e., residential or daycare), the nearest roadway (as described above), the distance from the receptor to the nearest roadway, the existing calculated noise levels, and the estimated future 24-hour L_{dn} sound levels at the receptor.

The general plan land use compatibility requirements are summarized in Table 4.D.7, p. 4.D.20. As summarized in Table 4.D.7, future sound levels at residential and daycare receptors that exceed 60 dBA L_{dn} and 63 dBA L_{dn}, respectively, would be considered “Conditionally Acceptable”. According to the general plan, planned uses with “Conditionally Acceptable” ambient noise environments should “…be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design.”

Future sound levels at residential and daycare receptors that exceed 65 dBA L_{dn} would be considered “Conditionally Acceptable to Unacceptable”. According to the general plan, planned residential uses within “Conditionally Acceptable to Unacceptable” environments should “…generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.”

The existing sound levels at the street exteriors of proposed onsite receptors are all at Conditionally Acceptable levels; however, each proposed new building and the adaptively reused building would be required to perform detailed acoustical analyses to ensure conformance with applicable Title 24 and Green Building Code requirements.

[46] Distances from roadways to proposed project building façades would be similar for the project variant.

Table 4.D.20: Estimated Future Traffic Noise Levels at New Occupied Buildings

Building	Primary Use	Nearest Roadway	Distance from Building to Nearest Roadway (feet) NOTE A	Estimated Level at Building Façade (dBA, L_{dn})		
				Existing	Cumulative + Project NOTE B	Increase NOTE C
Euclid Building	Residential	Euclid	95	61	62	0
Masonic Building	Residential	Masonic	55	64	64	0
Center Building A	Residential	Masonic	230	52	53 NOTE D	2
Center Building B	Residential	Masonic	75	62	63	1
Walnut Building (proposed project)	Office / Daycare	California	40	64	65	2
Walnut Building (project variant)	Residential / Daycare					
Plaza B Building	Residential	California	40	64	65	1
Plaza A Building	Residential	California	40	59	61	2
Mayfair Building	Residential	Laurel	45	59	61	2
Laurel Duplexes	Residential	Laurel	55	58	60	2

Notes:
[A] Approximate distance from building façade to centerline of nearest roadway, rounded to nearest 5 feet.
[B] Estimated noise levels at building façade for Cumulative + Project conditions are considered "Conditionally Acceptable" under general plan, except as indicated.
[C] Apparent calculation errors due to rounding of decimal values.
[D] Estimated future traffic noise level considered "Acceptable" under the general plan.

Source: Ramboll, 2018

As summarized in Table 4.D.20, future noise levels at the exterior façade of all onsite buildings would be 65 dBA L_{dn} or below. The change from existing noise levels would be 2 dBA or less at all onsite sensitive receptor locations. Thus, project-generated traffic, even in combination with traffic growth from regional sources and nearby future development, would not exacerbate the existing noise environment, and would not result in a significant environmental effect on new residents at the project site.

The sensitive receptors on the project site would be located in an area that is currently "conditionally acceptable to unacceptable" according to the general plan (see Table 4.D.7, p. 4.D.20), and would continue to be with future traffic noise. As noted above, new noise-sensitive development (residential uses and the daycare center use) located in an environment that is considered "conditionally acceptable to unacceptable" can only be undertaken "after a detailed analysis of the noise reduction requirements is made and needed noise insulation features [are] included in the design." Therefore, exterior noise levels would be reduced through implementation of a detailed noise analysis required as part of the building permit process, including ensuring that indoor levels are reduced to 45 dBA L_{dn} or lower, as specified in Title 24, Part 2 of the California Code of Regulation (see "California Noise Insulation Standards" on p. 4.D.15). As noted, HVAC systems are included in the project design. HVAC systems provide cooling during warm weather, allowing windows and doors to remain closed, and increasing the noise-reducing effect of the proposed building's structure.[47]

Additional onsite sources of operational noise, including those summarized in Impact NO-3, would not be expected to result in significant noise impacts at onsite receptors because they would be subject to the requirements under Mitigation Measure M-NO-3 regarding compliance with Article 29 and interior noise standards (see p. 4.D.60). In addition, performance-based standards have been provided for cooling equipment (see p. 4.D.64) and garbage collection (see p. 4.D.61). Further, generators and loading docks would be located underground and shielded from onsite receptors, and their use would be temporary and infrequent (i.e., delivery vehicles, including backup alarms) and generally would be consistent with the character of an urban environment within which the project site is located. The impacts of operational noise on onsite receptors would be less than significant. No mitigation is necessary.

Impact NO-6: Operation of the proposed project or project variant would not expose people and structures to or generate excessive groundborne vibration or noise levels. (*Less than Significant)*

No substantial sources of groundborne vibration are anticipated during operation of the proposed project or project variant. Onsite uses would include residential, commercial (office and retail), daycare, and open space uses, each of which would produce negligible vibration, similar to or less than existing facilities at the project site and surrounding residential and commercial uses. Therefore, vibration impacts related to operation of the proposed project or project variant would be less than significant and no mitigation is necessary.

CUMULATIVE IMPACTS

This section discusses the cumulative construction and operational noise impacts that could result from the proposed project or project variant in conjunction with past, present, and reasonably foreseeable future projects. Several potential cumulative projects have been identified within a quarter-mile radius of the project site, including new land development, transportation infrastructure, and streetscape projects. Descriptions of these past, present, and reasonably foreseeable future projects are provided in Section 4.A, Introduction to Chapter 4, pp. 4.A.7-4.A.12, and shown on Figure 4.A.1: Cumulative Projects (p. 4.A.12).

[47] Noise reduction provided by typical new building construction can increase from about 15 dBA, with windows open, up to 25 to 30 dBA or more with windows closed.

Construction

Impact C-NO-1: Construction noise as a result of the proposed project or project variant, combined with construction noise from reasonably foreseeable projects in the project area, would not cause a substantial temporary or periodic increase in ambient noise levels in the project vicinity during construction. (*Less than Significant)*

The potential for cumulative noise increases associated with construction of the proposed project or project variant would result if there are other projects located in the project vicinity that could be constructed at the same time, or that could substantially extend the duration of construction noise received at any nearby sensitive receptors.

Past, present, and reasonably foreseeable future projects in the vicinity include development projects and transportation infrastructure and streetscape projects (see Figure 4.A.1, p. 4.A.12). Development projects that are planned or currently under development are located at 3700 California Street, 2675 Geary Boulevard, 2670 Geary Boulevard, and 726 Presidio Avenue. These reasonably foreseeable future projects would include major construction elements such as demolition of existing structures and/or new building construction, requiring the use of heavy equipment. Refer to Section 4.E, Air Quality, Figure 4.E.2, p. 4.E.30, for a graphical representation of sensitive receptors within a roughly quarter-mile radius of the project site.

The closest past, present, and reasonably foreseeable future project that could overlap with construction of the proposed project or project variant is the redevelopment of the California Pacific Medical Center Campus located at 3700 California Street. The 3700 California Street project is located more than 1,320 feet west of the project site, along the north side of California Street, and would include the demolition of five existing buildings, excavation, the construction of 31 new buildings (single-family homes and multi-family residential buildings), and the adaptive reuse of two existing onsite structures. The nearest offsite noise-sensitive receptor in the direction of 3700 California Street is Receptor R5, representative of residential uses immediately north of the project site along the north side of California Street. Receptor R5 is located approximately 1,700 feet east of the 3700 California Street project site (see Figure 4.D.2, p. 4.D.13), and is subject to high levels of traffic noise from California Street, as described for Long Term Sound Measurement Location-3 (see Figure 4.D.1, p. 4.D.8). Long Term Sound Measurement Location-3 is representative of noise levels at receptors that face California Street, along the north or south side of this street, in the immediate vicinity of the project site. At this location, construction noise from the 3700 California Street project would not be expected to be audible due to the distance and the presence of intervening structures. Thus, the potential for construction-related noise from a site located more than 1,500 feet to the west in a densely developed urbanized area to combine with construction-related noise generated on the project site would be limited. Significant cumulative construction-related impacts would not be expected, and any contributions from the proposed project or project variant would be mitigated to the maximum extent feasible with implementation of Mitigation Measure M-NO-1 (pp. 4.D.41-4.D.43).

However, construction of the 3700 California Street project would occur over multiple years and would likely overlap with the proposed project's or project variant's construction activities. Therefore, haul truck traffic from construction of 3700 California Street is anticipated to overlap with the demolition, excavation, shoring and foundation installation, and exterior/interior finishing components of the different phases of the four-phase construction program for the proposed project or project variant. As a conservative estimate, assuming all traffic would travel along California Street, and assuming that the combined truck volume would be double that expected from the proposed project or project variant, cumulative truck traffic noise may increase by 2 dBA, a 1-dBA increase over haul traffic noise emissions from the proposed project or project variant only, which would not be noticeable in a busy urban environment. Thus, the effects of the proposed project or project variant combined with those of the 3700 California Street project would not result in cumulative construction noise impacts.

The nearest development projects to the project site are as follows:

- 726 Presidio Avenue, midblock between Bush and Sutter streets on south side of Presidio Avenue, approximately 450 feet southeast of the project site. The 726 Presidio Avenue project would result in the demolition of an existing three-story, multi-family residential building and, in its place, construction of a four-story multi-family residential building with below-grade parking resulting in an increase of four residential units for a total of seven.
- 2670 Geary Boulevard, at the northwest corner of Geary Boulevard and Masonic Avenue, approximately 800 feet south of the project site. The 2670 Geary Boulevard project would include the demolition of an existing one-story commercial building and the construction of a new eight-story mixed use building with up to 95 residential units, 1,800 gross square feet of ground floor retail, and parking.
- 2675 Geary Boulevard, within the parking lot of the existing City Center Shopping Mall, approximately 1,250 feet south of the project site. The 2675 Geary Boulevard project would include an approximately 17,100 gross square foot expansion of the retail square footage on the parking lot south of the existing City Center Shopping Mall structure.

Any project-related noise impacts associated with these reasonably foreseeable future projects would not combine to result in a significant cumulative construction noise impact due to their distance from each other and the relatively modest size of the development programs associated with the 726 Presidio Avenue and 2675 Geary Boulevard projects. Additionally, these projects (including the larger development at the 2670 Geary Boulevard site) would be completed prior to commencement of construction of the proposed project or project variant or, at a minimum, the loudest construction activities (demolition, excavation, and shoring/foundation installation) would have already been completed, thus minimizing any potential for combining with the loudest construction activities of the proposed project or project variant. Furthermore, and for the same reasons stated above, construction truck traffic noise associated with these development projects would not combine to result in a significant cumulative construction truck traffic impact. Thus, construction truck traffic associated with the cumulative projects would peak at different times due to earlier commencement of construction and would likely not overlap with the proposed project's or project variant's construction truck traffic, thus minimizing the potential for combined construction-related traffic noise increases. Therefore, cumulative construction noise impacts from these reasonably foreseeable future projects would not occur.

Past, present, and reasonably foreseeable future transportation infrastructure and streetscape projects include the Geary Bus Rapid Transit Project, the Laurel Heights/Jordan Park Traffic Calming Project, the California Laurel Village Improvement Project, Muni Forward (formerly the Transit Effectiveness Project), and the Masonic Avenue Streetscape Project.[48] The streetscape improvements associated with the Laurel Heights/Jordan Park Traffic Calming Project, the California Laurel Village Improvement Project, the Muni Forward improvements along California Street, and the Masonic Avenue Streetscape Project would be completed prior to construction of the proposed project or project variant. The Geary Bus Rapid Transit Project, located approximately 1,000 feet to the south, would be under construction during the same time as the proposed project or project variant; however, as a linear project with shifting work locations, construction noise would not affect the same sensitive receptors identified in the noise impact assessment for the proposed project or project variant. Thus, these transportation infrastructure and streetscape projects, when combined, would not result in any significant cumulative construction-related noise impacts.

As discussed above, none of the reasonably foreseeable future projects identified in the vicinity of the project site would result in construction noise impacts that could combine with those of the proposed project or project variant to substantially affect sensitive receptors in the vicinity of the 3333 California Street project site. This is primarily due to the distance of these future projects from the project site, the presence of intervening structures, and the construction timelines (i.e., would be completed prior to commencement of construction of the proposed project or project variant). Thus, cumulative construction noise impacts would be less than significant. No mitigation is necessary.

[48] The state clearinghouse number for the Geary Bus Rapid Transit Project is 2008772095. There is no corresponding local environmental case number. The state clearinghouse number for the Muni Forward (or Transit Effectiveness) Project is 2011112030 and its environmental case number is 2011.0558E.

Operation

Impact C-NO-2: Operation of the proposed project or project variant, in combination with other development, would not cause a substantial permanent increase in ambient noise levels in the project vicinity. (*Less than Significant)*

Noise from operation of mechanical equipment at the reasonably foreseeable development project sites would be localized and would be required to meet the performance standards for mechanical equipment identified in the noise ordinance. Due to the distance of the 3333 California Street project site from these sites, the typical rate of attenuation for noise, and the presence of intervening structures, the potential for combined noise effects from operation of stationary equipment would be extremely limited. In addition, the redevelopment of the 3700 California Street project site would result in the removal of existing sources of stationary noise (i.e. emergency diesel generators and other HVAC systems associated with the existing hospital use). Thus, operation of the proposed project or project variant in combination with the reasonably foreseeable development projects would result in less-than-significant cumulative noise impacts.

Traffic associated with expected cumulative development in the vicinity of the proposed project or project variant was added to future traffic volumes (based on expected regional growth) and project-related and project-variant traffic volumes. Cumulative development includes regional background growth plus all reasonably foreseeable projects in the vicinity of the project site that may contribute to traffic volumes along local roadways in the project's horizon year (i.e., 2040).

To evaluate the potential for impact due to the addition of cumulative projects, noise modeling was completed along the same roadway segments identified in Impact NO-4 (see Table 4.D.19, p. 4.D.63). Traffic noise modeling methods are described in "Methodology for Analysis of Operations", p. 4.D.27. Traffic model details for cumulative traffic data (volumes, speeds, composition) are found in EIR Appendix E, Table NO-4.

A cumulative traffic noise impact would occur if future cumulative + project traffic noise levels would exceed existing ambient traffic noise levels by more than 5 dBA, or by more than 3 dBA when ambient noise levels are "Conditionally Acceptable", "Conditionally Unacceptable", or "Unacceptable". Results of the cumulative traffic noise analysis are summarized in Table 4.D.21: Cumulative Traffic Noise Levels Near Area Roadways. As summarized in Table 4.D.21, cumulative noise level increases along area roadways would be 1 dBA L_{dn} or less with the proposed project or project variant when compared to without the proposed project or project variant. Future Cumulative (i.e., horizon year 2040) + Project compared to existing traffic noise levels would result in increases of 2 dBA L_{dn} or less. Cumulative noise impacts due to increases in offsite traffic attributable to projected growth to 2040 (including the land development, transportation infrastructure, and streetscape projects in the immediate vicinity of the 3333 California Street project site) would therefore be less than significant, and no mitigation is necessary.

Table 4.D.21: Cumulative Traffic Noise Levels Near Area Roadways

Roadway Segment	Distance from Roadway to Nearest Structure (feet)	Sound Level (dBA, L_{dn})				
		Existing	Cumulative	Cumulative + Project	Increase: Cumulative + Project Over NOTE A	
					Existing	Cumulative
California Street west of Walnut Street	40	64	64	65	1	1
California Street between Walnut Street and Presidio Avenue	40	64	65	65	2	1
California Street east of Presidio Avenue	30	65	65	65	0	0
Laurel Street north of Mayfair Drive	45	59	60	61	2	1
Laurel Street south of Mayfair Drive	25	61	62	63	2	1
Euclid Avenue west of Masonic Avenue	50	63	64	64	1	0
Euclid Avenue between Masonic Avenue and Presidio Avenue	55	62	63	63	1	0
Euclid Avenue east of Presidio Avenue	30	64	65	65	1	0
Masonic Avenue north of Euclid Avenue	45	65	65	65	0	0
Masonic Avenue east of Presidio Avenue	20	69	69	69	1	0
Presidio Avenue north of California Street	50	60	61	62	2	1
Presidio Avenue south of California Street	40	61	62	62	2	1
Presidio Avenue south of Masonic Avenue	40	61	62	62	2	1
Masonic Avenue south of Euclid Avenue	50	65	66	66	0	0
Presidio Avenue south of Euclid Avenue	35	59	60	61	2	1

Note:
[A] Apparent calculation errors due to rounding of decimal values

Source: Ramboll, 2018

E. AIR QUALITY

INTRODUCTION

Section 4.E, Air Quality, discusses the existing air quality conditions in the project area, presents the regulatory framework for air quality management, and analyzes the potential for the proposed project or project variant to affect existing air quality conditions, both regionally and locally, from activities that emit criteria and non-criteria air pollutants. It also analyzes the types and quantities of emissions that would be generated both on a temporary basis from proposed construction activities and over the long term from operation of the proposed project or project variant. The analysis determines whether those emissions are significant in relation to applicable air quality standards and identifies feasible mitigation measures for significant adverse impacts, if required. This section also includes an analysis of cumulative air quality impacts. Emissions of greenhouse gases (GHGs) and potential impacts on climate change and the city's and state's goals for GHG emissions are discussed in the initial study (see EIR Appendix B, Topic E.7, Greenhouse Gas Emissions).

The analysis is based on a review of existing air quality conditions in the Bay Area region and air quality regulations administered by the U.S. Environmental Protection Agency (U.S. EPA), the California Air Resources Board (air resources board), and the Bay Area Air Quality Management District (air district or BAAQMD). This analysis includes methodologies identified in the air district's updated CEQA Air Quality Guidelines[1] and its companion documentation. Calculations were prepared to quantitatively assess the air quality contributions of the proposed project and project variant (see EIR Appendix F: Air Quality Calculation Details and Supporting Information); this information forms the basis of much of the assessment of air quality impacts presented herein.

The air quality impact methodologies and approaches to the analysis (described under "Approach to Analysis" on pp. 4.E.26–4.E.27, and in the Air Quality Scope of Work included in EIR Appendix F[2]) are based on an approximately seven-year construction duration and a four-phase construction program that would constitute maximum development on the site, with construction estimated to start in 2020 and continue through 2027 (see Chapter 2, Project Description, pp. 2.91-2.96 for a detailed discussion of the preliminary construction phasing). The project sponsor may choose to develop the proposed project or project variant over a 15-year timeframe and may also develop the phases in a different order. For purposes of CEQA, the construction and operational air quality emissions analysis under a seven-year timeframe is the most conservative (or worst case) analysis

1 Bay Area Air Quality Management District (BAAQMD), CEQA Air Quality Guidelines, updated May 2017, http://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en, accessed May 25, 2018.

2 Changes to the methodology made since the Scope of Work was approved include (1) the hours assumed for the existing emergency generator; (2) the methodology for operational traffic; and (3) the methodology for the review of the 2040 cumulative conditions. Updated methodologies for these items are discussed in this EIR section and supersede the methodologies described in the Scope of Work.

because it assesses continuous construction over a shorter time period (i.e., construction activities would be more concentrated) and does not factor in technological advances beyond the seven-year construction period that could result in cleaner construction equipment, construction trucks, stationary equipment, or the vehicle fleet. Under a 15-year construction timeframe, the same development program would be implemented; however, periods of dormancy would be introduced between construction phases; some construction activities assumed in the analysis as concurrent would occur separately over a longer timeframe, reducing construction emissions at any one point in time; and construction equipment is likely to become cleaner over time as emissions standards become more stringent. Thus, under a longer construction timeframe, the effects on ambient air quality and future on-site and off-site sensitive land uses would be similar to, but less concentrated than, those under a seven-year construction timeframe. Additionally, while a different order for the construction phases may result in minor changes in air pollutant emissions for a particular phase, it would not substantially change the overall emissions. It may change the location of maximally exposed onsite and offsite sensitive receptor locations; however, due to the emissions staying roughly the same, the overall health impacts would stay substantially the same as well.

ENVIRONMENTAL SETTING

CLIMATE AND METEOROLOGY

The project site is in the San Francisco Bay Area Air Basin (air basin). The air basin's moderate climate steers storm tracks away from the region for much of the year, although storms generally affect the region from November through April. San Francisco's proximity to the onshore breezes stimulated by the Pacific Ocean provides for generally very good air quality in the city.

Annual temperatures in the project area average in the mid-50s (degrees Fahrenheit), generally ranging from the low 40s on winter mornings to the mid-70s during summer afternoons. Daily and seasonal changes in temperature are small because of the moderating effects of nearby San Francisco Bay. In contrast to the steady temperature regime, rainfall is highly variable and confined almost exclusively to the "rainy" period from November through April. Precipitation may vary widely from year to year as a shift in the annual storm track of a few hundred miles can mean the difference between a very wet year and drought conditions.

Atmospheric conditions such as wind speed, wind direction, and air temperature gradients interact with the physical features of the landscape to determine the movement and dispersal of air pollutants regionally. The project area is within the peninsula climatological subregion. Marine air traveling through the Golden Gate is a dominant weather factor affecting dispersal of air pollutants within the region. Wind measurements recorded on the San Francisco mainland indicate a prevailing wind direction from the west and an average annual wind speed of 10.1 miles per hour.[3] Increased temperatures create the conditions in which ozone formation can increase.

AMBIENT AIR QUALITY – CRITERIA AIR POLLUTANTS

As required by the 1970 Federal Clean Air Act, the U.S. EPA initially identified six criteria air pollutants that are pervasive in urban environments and for which state and federal health-based ambient air quality standards have been established. The U.S. EPA calls these pollutants "criteria air pollutants," because it has regulated them by developing specific public-health-based and welfare-based criteria as the basis for setting permissible levels. Ozone, carbon monoxide (CO), particulate matter (PM), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), and lead are the six criteria air pollutants originally identified by the U.S. EPA. Since adoption of the 1970 act, subsets of PM have been identified for which permissible levels have been established. These include PM of 10 microns in diameter or less (PM_{10}) and PM of 2.5 microns in diameter or less ($PM_{2.5}$).

The air district is the regional agency with jurisdiction for regulating air quality within the nine-county San Francisco Bay Area Air Basin. The region's air quality monitoring network provides information on ambient concentrations of criteria air pollutants at various locations in the San Francisco Bay Area. Table 4.E.1: Summary of San Francisco Air Quality Monitoring Data (2013-2017) presents a five-year summary of the highest annual criteria air pollutant concentrations, recorded at the air quality monitoring station operated and maintained by the air district at 16th and Arkansas streets (Potrero Hill), approximately 3 miles southeast of the project site. Table 4.E.1 also compares measured pollutant concentrations with the most stringent applicable ambient air quality standards (state or federal). These concentrations are health-based standards established with an ample margin of safety. To determine attainment with air quality standards, exceedances are assessed on a region-wide basis. Concentrations shown in boldface type indicate only a localized exceedance of the standard.

Ozone

Ozone is a secondary air pollutant produced in the atmosphere through a complex series of photochemical reactions involving reactive organic gases (ROG, also sometimes referred to as "volatile organic compounds" [VOCs] by some regulatory agencies) and oxides of nitrogen (NOx) in the presence of sunlight. The main sources of ROG and NOx, often referred to as "ozone precursors," are combustion processes (including motor vehicle engines) and the evaporation of solvents, paints, and fuels. In the Bay Area, automobiles are the single largest source of ozone precursors.

3 Western Regional Climate Center, website query, Prevailing Wind Direction and Average Monthly Wind Speed (2001-2011), https://wrcc.dri.edu/Climate/comp_table_show.php?stype=wind_dir_avg and https://wrcc.dri.edu/Climate/comp_table_show.php?stype=wind_speed_avg.2001-2011, accessed May 25, 2018.

Table 4.E.1: Summary of San Francisco Air Quality Monitoring Data (2013-2017)

Pollutant	Most Stringent Applicable Standard	Number of Days Standards Were Exceeded and Maximum Concentrations Measured [NOTE A]				
		2013	2014	2015	2016	2017
Ozone						
Maximum 1-Hour Concentration (ppm)	>0.09 [NOTE B]	0.069	0.079	0.085	0.070	0.087
Days 1-Hour Standard Exceeded		0	0	0	0	0
Maximum 8-Hour Concentration (ppm)	>0.070 [NOTES B & C]	0.059	0.069	0.067	0.057	0.054
Days 8-Hour Standard Exceeded		0	0	0	0	0
Carbon Monoxide (CO)						
Maximum 1-Hour Concentration (ppm)	>20 [NOTE B]	1.8	1.6	1.8	1.7	2.5
Days 1-Hour Standard Exceeded		0	0	0	0	0
Maximum 8-Hour Concentration (ppm)	>9.0 [NOTES B & C]	1.4	1.2	1.3	1.1	1.4
Days 8-Hour Standard Exceeded		0	0	0	0	0
Respirable Particulate Matter (PM_{10})						
Maximum 24-Hour Concentration ($\mu g/m^3$)	>50 [NOTE B]	44	36	47	29	**77**
Days 24-Hour Standard Exceeded [NOTE D]		0	0	0	0	2
Fine Particulate Matter ($PM_{2.5}$)						
Maximum 24-Hour Concentration ($\mu g/m^3$)	>35 [NOTE C]	**49**	33	**35**	19.6	**49.9**
Days 24-Hour Standard Exceeded		2	0	0	0	7
Annual Average ($\mu g/m^3$)	>12 [NOTES B & C]	10.1	7.7	9.6	7.5	9.7
Nitrogen Dioxide (NO_2)						
Maximum 1-Hour Concentration (ppm)	>0.100 [NOTE C]	0.07	0.08	0.07	0.06	0.07
Days 1-Hour Standard Exceeded		0	0	0	0	0

Notes: **Boldface** values are in excess of applicable standard; ppm = parts per million; µg/m3 = micrograms per cubic meter; > = greater than

[A] Number of days exceeded is for all days in a given year, except for PM_{10}, which has been monitored once every 12 days as of January 2013.

[B] State standard, not to be exceeded.

[C] Federal standard, not to be exceeded.

[D] Based on a sampling schedule of 1 out of every 12 days, for a total of approximately 30 samples per year.

Source: BAAQMD, Bay Area Air Pollution Summary, 2013-2017

Ozone is referred to as a "regional air pollutant" because its precursors are transported and diffused by wind concurrently with ozone production through the photochemical reaction process. Ozone causes eye irritation, airway constriction, and shortness of breath and can aggravate existing respiratory diseases, such as asthma, bronchitis, and emphysema. According to published data, and as shown in Table 4.E.1 the most stringent applicable standards for ozone (state 1-hour standard of 0.09 parts per million [ppm] and the federal 8-hour standard of 0.070 ppm) were not exceeded in San Francisco between 2013 and 2017. In 2015, the U.S. EPA strengthened the 8-hour ozone standard to 0.070 ppm, and the new standard became effective December 28, 2015.

Carbon Monoxide

CO is an odorless, colorless gas usually formed as the result of the incomplete combustion of fuels. The single largest source of CO is motor vehicles; the highest emissions occur during low travel speeds, stop-and-go driving, cold starts, and hard acceleration. Exposure to high concentrations of CO reduces the oxygen-carrying capacity of the blood and can cause headaches, nausea, dizziness, and fatigue; impair central nervous system function; and induce angina (chest pain) in persons with serious heart disease. Very high levels of CO can be fatal. As shown in Table 4.E.1, p. 4.E.4, the more stringent state CO standards were not exceeded between 2013 and 2017. Measurements of CO indicate hourly maximums ranging between 8 and 10 percent of the more stringent state standard, and maximum 8-hour CO levels that are approximately 12 to 16 percent of the allowable 8-hour standard.

Particulate Matter

Particulate matter is a class of air pollutants that consists of a complex mix of solid and liquid airborne particles from human-made and natural sources. Particulate matter is measured in two size ranges: PM_{10} and $PM_{2.5}$. In the Bay Area, motor vehicles generate about one-half of the San Francisco Bay Area Air Basin's particulates through tailpipe emissions as well as brake pad and tire wear. Wood burning in fireplaces and stoves, industrial facilities, and ground-disturbing activities such as construction are other sources of such fine particulates. These fine particulates are small enough to be inhaled into the deepest parts of the human lung and can cause adverse health effects. According to the air resources board, studies in the United States and elsewhere "have demonstrated a strong link between elevated particulate levels and premature deaths, hospital admissions, emergency room visits, and asthma attacks," and studies of children's health in California have demonstrated that particle pollution "may significantly reduce lung function growth in children."[4] The air resources board also reports that statewide attainment of PM standards could prevent thousands of premature deaths, lower hospital admissions for cardiovascular and

4 California Air Resources Board (CARB), Recent Research Findings: Health Effects of Particulate Matter and Ozone Air Pollution, November 2007, p. 1.

respiratory disease and asthma-related emergency room visits, and avoid hundreds of thousands of episodes of respiratory illness in California.[5]

Among the criteria pollutants that are regulated, particulates appear to represent a serious ongoing health hazard. As long ago as 1999, the air district was reporting, in its CEQA Air Quality Guidelines, that studies had shown that elevated particulate levels contribute to the death of approximately 200 to 500 people per year in the Bay Area. $PM_{2.5}$ is of particular concern because epidemiological[6] studies have demonstrated that people who live near freeways, especially people who live within 500 feet of freeways or high-traffic roadways and are exposed to vehicle-emitted $PM_{2.5}$, have poorer health outcomes, including increased asthma symptoms and respiratory infections and decreased pulmonary function and lung development in children.[7]

As shown in Table 4.E.1, p. 4.E.4, the state 24-hour PM_{10} standard was exceeded on two monitored occasions between 2013 and 2017 in San Francisco (both in 2017 during the wildfire period in the counties to the north of San Francisco). It is estimated that the state 24-hour PM_{10} standard of 50 micrograms per cubic meter ($\mu g/m^3$) was exceeded on up to 24 days per year between 2013 and 2017.[8] The federal 24-hour $PM_{2.5}$ standard was not exceeded between 2013 and 2017. The federal and state annual average $PM_{2.5}$ standards were not exceeded between 2013 and 2017.

Nitrogen Dioxide

NO_2 is a reddish-brown gas that is a byproduct of combustion processes. Automobiles and industrial operations are the main sources of NO_2. Aside from its contribution to ozone formation, NO_2 can increase the risk of acute and chronic respiratory disease and reduce visibility. NO_2 may be visible as a coloring component of the air on high-pollution days, especially in conjunction with high ozone levels. The current state 1-hour standard for NO_2 (0.18 ppm) is being met in San Francisco. In 2010, the U.S. EPA implemented a new 1-hour NO_2 standard (0.10 ppm), which is presented in Table 4.E.2: State and Federal Ambient Air Quality Standards and Attainment Status for the San Francisco Bay Area Air Basin. Currently, the air resources board is recommending that

5 California Air Resources Board (CARB), Recent Research Findings: Health Effects of Particulate Matter and Ozone Air Pollution, November 2007, p. 1.

6 Epidemiology is a branch of medical science that deals with the incidence, distribution, and control of disease in a population.

7 San Francisco Department of Public Health (SFDPH), *Assessment and Mitigation of Air Pollutant Health Effect from Intra-urban Roadways: Guidance for Land Use Planning and Environmental Review*, May 2008, p. 7.

8 PM_{10} was sampled every twelfth day; therefore, actual days over the standard can be estimated to be up to twelve times the numbers listed in the table. $PM_{2.5}$ is continuously monitored.

Table 4.E.2: State and Federal Ambient Air Quality Standards and Attainment Status for the San Francisco Bay Area Air Basin

Pollutant	Averaging Time	State (SAAQS NOTE A)		Federal (NAAQS NOTE B)	
		Standard	Attainment Status	Standard	Attainment Status
Ozone	1-hour	0.09 ppm	**N**	NA	See **NOTE C**
	8-hour	0.070 ppm	**N**	0.070 ppm NOTE D	**N**; see **NOTE E**
Carbon Monoxide (CO)	1-hour	20 ppm	A	35 ppm	A
	8-hour	9 ppm	A	9 ppm	A
Nitrogen Dioxide (NO_2)	1-hour	0.18 ppm	A	0.100 ppm	A **NOTE F**
	Annual	0.030 ppm	NA	0.053 ppm	A
Sulfur Dioxide (SO_2)	1-hour	0.25 ppm	A	0.075 ppm	See **NOTE G**
	24-hour	0.04 ppm	A	0.14 ppm	See **NOTE G**
	Annual	NA	NA	0.03 ppm	See **NOTE G**
Particulate Matter (PM_{10})	24-hour	50 µg/m³	**N**	150 µg/m³	U
	Annual NOTE H	20 µg/m³	**N** NOTE I	NA	NA
Fine Particulate Matter ($PM_{2.5}$)	24-hour	NA	NA	35 µg/m³	**N**
	Annual	12 µg/m³	**N** NOTE I	12 µg/m³	U/A
Sulfates	24-hour	25 µg/m³	A	NA	NA
Lead	30-day	1.5 µg/m³	A	NA	NA
	Cal. Quarter	NA	NA	1.5 µg/m³	A
	Rolling 3-month average	NA	NA	0.15	U; see **NOTE J**
Hydrogen Sulfide	1-hour	0.03 ppm	U	NA	NA
Visibility-Reducing Particles	8-hour	See **NOTE K**	U	NA	NA

Notes: A = Attainment; **N** = Non-attainment; U = Unclassified; NA = Not Applicable, no applicable standard; ppm = parts per million; µg/m³ = micrograms per cubic meter

[A] SAAQS = state ambient air quality standards (California). SAAQS for ozone, CO (except Lake Tahoe), SO_2 (1-hour and 24-hour), NO_2, PM, and visibility-reducing particles are values that are not to be exceeded. All other state standards shown are values not to be equaled or exceeded.

[B] NAAQS = national ambient air quality standards. NAAQS, other than ozone and particulates, and those based on annual averages or annual arithmetic means, are not to be exceeded more than once a year. The 8-hour ozone standard is attained when the 3-year average of the fourth highest daily concentration is 0.07 ppm or less. The 24-hour PM_{10} standard is attained when the 3-year average of the 99th percentile of monitored concentrations is less than the standard. The 24-hour $PM_{2.5}$ standard is attained when the 3-year average of the 98th percentile is less than the standard.

[C] The U.S. EPA revoked the national 1-hour ozone standard on June 15, 2005.

[D] This federal 8-hour ozone standard was approved by U.S. EPA in October 2015 and became effective on December 28, 2015.

[E] On October 1, 2015, the national 8-hour ozone primary and secondary standards were lowered from 0.075 to 0.070 ppm. An area will meet the standard if the fourth-highest maximum daily 8-hour ozone concentration per year, averaged over three years, is equal to or less than 0.070 ppm. U.S. EPA made recommendations on attainment designations for California on October 3, 2016. The deadline to issue final designations was extended to October 1, 2018.

[F] To attain this standard, the 3-year average of the 98th percentile of the daily maximum 1-hour average at each monitor within an area must not exceed 0.100 ppm (effective January 22, 2010).

Pollutant	Averaging Time	State (SAAQS [NOTE A])		Federal (NAAQS [NOTE B])	
		Standard	Attainment Status	Standard	Attainment Status

[G] On June 2, 2010, the U.S. EPA established a new 1-hour SO2 standard, effective August 23, 2010, which is based on the 3-year average of the annual 99th percentile of 1-hour daily maximum concentrations. The existing 0.030 ppm annual and 0.14 ppm 24-hour SO2 NAAQS, however, must continue to be used until one year following U.S. EPA initial designations of the new 1-hour SO2 NAAQS. U.S. EPA classified the San Francisco Bay Area Air Basin as being in Attainment/Unclassifiable in January 2018 (Federal Register Vol. 83, No. 6, pp. 1098-1172).

[H] State standard = annual geometric mean; national standard = annual arithmetic mean.

[I] In June 2002, the California Air Resources Board established new annual standards for $PM_{2.5}$ and PM_{10}.

[J] National lead standard, rolling 3-month average: final rule signed October 15, 2008. Final designations effective December 31, 2011.

[K] Statewide visibility-reducing particle standard (except Lake Tahoe Air Basin): Particles in sufficient amount to produce an extinction coefficient of 0.23 per kilometer when the relative humidity is less than 70 percent. This standard is intended to limit the frequency and severity of visibility impairment due to regional haze and is equivalent to a 10-mile nominal visual range.

Sources: BAAQMD, Standards and Attainment Status, last updated January 5, 2017; U.S. EPA National Ambient Air Quality Standards, last updated December 20, 2016.

the San Francisco Bay Area Air Basin be designated as an attainment area for the new standard.[9] As shown in Table 4.E.1, p. 4.E.4, this new federal standard was not exceeded at the San Francisco station between 2013 and 2017.

The U.S. EPA has also established requirements for a new monitoring network to measure NO_2 concentrations near major roadways in urban areas with a population of 500,000 or more. Sixteen new near-roadway monitoring sites are required in California, three of which are in the Bay Area. These monitors are located in Berkeley, Oakland, and San Jose. The Oakland station commenced operation in February 2014, the San Jose station in March 2015, and the Berkeley station in July 2016. The new monitoring data may result in a need to change area designations in the future. The air resources board will revise the area designation recommendations, as appropriate, once the new monitoring data become available.

Sulfur Dioxide

SO_2 is a colorless, acidic gas with a strong odor. It is produced by the combustion of sulfur-containing fuels such as oil, coal, and diesel. SO_2 has the potential to damage materials and can cause health effects at high concentrations. It can irritate lung tissue and increase the risk of acute and chronic respiratory disease.[10] Pollutant trends suggest that the San Francisco Bay Area Air Basin currently meets and will continue to meet the state standard for SO_2 for the foreseeable future.

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9 CARB, Recommended Area Designations for the 2010 Nitrogen Dioxide Standards, Technical Support Document, January 2011, https://www.arb.ca.gov/desig/NO2_Enclosure_1.pdf, accessed August 6, 2018.

10 BAAQMD, CEQA Air Quality Guidelines, May 2017, p. C-16, http://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en, accessed August 6, 2018.

In 2010, the U.S. EPA implemented a new 1-hour SO_2 standard, which is presented in Table 4.E.2, pp. 4.E.7-4.E.8. The EPA initially designated the air basin as an attainment area for SO_2. Similar to the new federal standard for NO_2, the U.S. EPA established requirements for a new monitoring network to measure SO_2 concentrations beginning in January 2013.[11] No additional SO_2 monitors are required for the Bay Area, because the air district's jurisdiction has never been designated as non-attainment for SO_2 and no state implementation plans or maintenance plans have been prepared for SO_2.[12]

Lead

Leaded gasoline (phased out from use in automobiles in the United States beginning in 1973), paint (on older houses, cars), smelters (metal refineries), and manufacture of lead storage batteries have been the primary sources of lead released into the atmosphere. Lead has a range of adverse neurotoxic health effects, which put children at special risk. Some lead-containing chemicals cause cancer in animals. Lead levels in the air have decreased substantially since leaded gasoline in automobiles was eliminated.

Ambient lead concentrations are monitored only on an as-warranted, site-specific basis in California. On October 15, 2008, the U.S. EPA strengthened the national ambient air quality standard for lead by lowering it from 1.50 $\mu g/m^3$ to 0.15 $\mu g/m^3$ on a rolling 3-month average. The U.S. EPA revised the monitoring requirements for lead in December 2010.[13] These requirements focus on airports and large urban areas and resulted in an increase in 76 monitors nationally. In the Bay Area, lead monitoring stations are located at Reid-Hillview Airport and at 158 East Jackson Street, both in San Jose. Another lead monitoring station, at San Carlos Airport, was discontinued as of April 11, 2017.

Air Quality Index

The U.S. EPA developed the Air Quality Index (AQI) scale to make the public health impacts of air pollution concentrations easily understandable. The AQI, much like an air quality "thermometer," translates daily air pollution concentrations into a number on a scale between 0 and 500 and assigns the number to one of the following six color-coded ranges that rank air quality:

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11 U.S. Environmental Protection Agency (U.S. EPA), Fact Sheet: Revisions to the Primary National Ambient Air Quality Standard, Monitoring Network, and Data Reporting Requirements for Sulfur Dioxide, June 2, 2010, https://www.epa.gov/sites/production/files/2016-05/documents/final_primary_naaqs_factsheet.pdf, accessed August 6, 2018.

12 BAAQMD, 2013 Air Monitoring Network Plan, July 2014, p. 27, http://www.baaqmd.gov/~/media/Files/Technical%20Services/2013_Network_Plan.ashx?la=en, accessed October 19, 2017.

13 U.S. EPA, Fact Sheet: Revisions to Lead Ambient Air Quality Monitoring Requirements, https://www.epa.gov/sites/production/files/2016-03/documents/leadmonitoring_finalrule_factsheet.pdf, accessed May 25, 2018.

- **Good (Green, AQI = 0–50):** Air quality is considered satisfactory, and air pollution poses little or no risk.
- **Moderate (Yellow, AQI = 51–100):** Air quality is acceptable; however, for some pollutants there may be a moderate health concern for a very small number of people who are unusually sensitive to air pollution. Unusually sensitive people should consider reducing prolonged or heavy outdoor exertion.
- **Unhealthy for Sensitive Groups (Orange, AQI = 101–150):** Although the general public is not likely to be affected at this AQI range, people with lung disease as well as older adults and children are at a greater risk from exposure to ozone, whereas persons with heart and lung disease, older adults, and children are at greater risk from the presence of particles in the air. Active children and adults, and people with respiratory disease, such as asthma, should limit prolonged or heavy outdoor exertion.
- **Unhealthy (Red, AQI = 151–200):** Everyone may begin to experience some adverse health effects, and members of the sensitive groups may experience more serious effects. Active children and adults, and people with respiratory disease, such as asthma, should avoid prolonged outdoor exertion; everyone else, especially children, should limit prolonged outdoor exertion.
- **Very Unhealthy (Purple, AQI = 201–300):** The rating of “very unhealthy” air quality would trigger a health alert signifying that everyone may experience more serious health effects. Active children and adults, and people with respiratory disease, such as asthma, should avoid prolonged outdoor exertion; everyone else, especially children, should limit outdoor exertion.
- **Hazardous (Maroon, AQI = 301–500):** The rating of “hazardous” air quality would trigger health warnings of emergency conditions. The entire population is more likely to be affected. Everyone, especially children, should limit outdoor exertion.

The AQI numbers refer to specific amounts of pollution in the air. They are based on the federal air quality standards for ozone, CO, NO_2, SO_2, PM_{10}, and $PM_{2.5}$. In most cases, the federal standard for these air pollutants corresponds to the number 100 on the AQI chart. If the concentration of any of these pollutants rises above its respective standard, the air quality can be unhealthy for the public. In determining the air quality forecast, local air districts, including the Bay Area Air Quality Management District, use the anticipated concentration measurements for each of the major pollutants, convert them into AQI numbers, and determine the highest AQI for each zone in a district.

Readings below 100 on the AQI scale would not typically affect the health of the general public (although readings in the moderate range of 50 to 100 may affect unusually sensitive people). Levels above 300 rarely occur in the United States, and readings above 200 have not occurred in the Bay Area in decades, with the exception of the October 2017 wildfires north of San Francisco.[14] As a result, the Air Quality Index in several neighboring counties reached the “very unhealthy” designation, ranging from values of 201 to 300. During that period, the air district issued “Spare

[14] BAAQMD, http://sparetheair.org/Stay-Informed/Todays-Air-Quality/Air-Quality-Index.aspx, accessed May 25, 2018.

the Air" alerts and recommended that individuals stay inside with windows closed and refrain from significant outdoor activity. However, this was an extraordinary event and is a rare occurrence in the Bay Area.

AQI statistics over recent years indicate that air quality in the Bay Area is predominantly in the "Good" or "Moderate" categories and healthy on most days for most people. Historical air district data indicate that the San Francisco Bay Area Air Basin experienced air quality in the red level (unhealthy) on seven days between 2013 and 2017. As shown in Table 4.E.3: Air Quality Index Statistics for the San Francisco Bay Area Air Basin for Ozone, the air basin had a total of 13 orange-level (unhealthy for sensitive groups) days in 2013, 9 days in 2014, 12 days in 2015, 11 days in 2016, and 3 days in 2017.

Table 4.E.3: Air Quality Index Statistics for the San Francisco Bay Area Air Basin for Ozone

Air Quality Index Levels	Number of Days by Year				
	2013	2014	2015	2016	2017
Unhealthy for Sensitive Groups (Orange)	13	9	12	11	3
Unhealthy (Red)	1	1	0	1	4

Source: BAAQMD, 2018

TOXIC AIR CONTAMINANTS AND LOCAL HEALTH RISKS AND HAZARDS

In addition to criteria air pollutants, individual projects may emit toxic air contaminants (TACs). TACs collectively refer to a diverse group of air pollutants that are capable of causing chronic (i.e., of long duration) and acute (i.e., severe but short-term) adverse effects on human health, including carcinogenic effects.[15] Human health effects of TACs include birth defects, neurological damage, cancer, and death. There are hundreds of different types of TACs with varying degrees of toxicity. Individual TACs vary greatly in the health risk they present; at a given level of exposure, one TAC may pose a hazard that is many times greater than another.

Unlike criteria air pollutants, TACs are not subject to ambient air quality standards but are regulated by the air district using a risk-based approach to determine which sources and pollutants to control as well as the degree of control. A health risk assessment is an analysis that estimates human health exposure to toxic substances and, when considered together with information regarding the toxic potency of the substances, provides quantitative estimates of health risks.[16]

[15] "Carcinogenic" indicates that scientific studies have shown that exposure to a substance or mixture of substances at certain levels for some period of time has the potential to promote the formation of cancer.

[16] In general, a health risk assessment is required if the air district concludes that projected emissions of a specific air toxic compound from a proposed new or modified source suggest a potential public health risk. The applicant is then subject to a health risk assessment for the source in question. Such an assessment generally evaluates chronic, long-term effects, estimating the increased risk of cancer as a result of exposure to one or more TACs.

Exposures to fine PM ($PM_{2.5}$) are strongly associated with mortality, respiratory diseases, and impaired lung development in children, as well as other end results, such as hospitalization for cardiopulmonary disease.[17] In addition to $PM_{2.5}$, diesel PM (DPM), a byproduct of diesel fuel combustion, is also of concern. The air resources board identified DPM as a TAC in 1998, primarily based on evidence demonstrating cancer effects in humans.[18] The estimated cancer risk from exposure to diesel exhaust is much higher than the risk associated with any other TAC routinely measured in the region.

San Francisco Modeling of Air Pollution Exposure Zones

In an effort to identify areas of San Francisco most adversely affected by sources of TACs, San Francisco partnered with the air district to inventory and assess air pollution and exposures from vehicles, stationary sources, and area sources within San Francisco. Citywide air quality dispersion modeling was conducted using AERMOD[19] to assess the emissions from the following primary sources: vehicles on local roadways, permitted stationary sources, port and maritime sources, and Caltrain. Emissions of PM_{10} (DPM is assumed equivalent to PM_{10}), $PM_{2.5}$, and total organic gases (TOG) were modeled on a 20-by-20-meter receptor grid covering the entire city. The citywide modeling results represent a comprehensive assessment of existing cumulative exposures to air pollution throughout the city. The methodology and technical documentation for modeling citywide air pollution is available in *The San Francisco Community Risk Reduction Plan: Technical Support Documentation*.[20] The San Francisco Planning and Public Health departments, along with the air district, are preparing a draft San Francisco Community Risk Reduction Plan, expected to be released in 2018, which will be a comprehensive and citywide plan to protect human health from the negative effects of air pollution within San Francisco.[21]

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

18 CARB, Fact Sheet: The Toxic Air Contaminant Identification Process: Toxic Air Contaminant Emissions from Diesel-fueled Engines, October 1998.

19 AERMOD is the EPA's preferred or recommended steady-state air dispersion plume model. Dispersion modeling uses mathematical formulations to characterize the atmospheric processes that disperse a pollutant emitted by a source. Based on emissions and meteorological inputs, a dispersion model can be used to predict concentrations at selected downwind receptor locations. These air quality models are used to determine compliance with National Ambient Air Quality Standards and other regulatory requirements such as the New Source Review regulation. For more information on AERMOD and to download the AERMOD Implementation Guide, see https://www.epa.gov/scram/air-quality-dispersion-modeling-preferred-and-recommended-models, accessed May 25, 2018.

20 BAAQMD, SFDPH, and San Francisco Planning Department, The San Francisco Community Risk Reduction Plan: Technical Support Documentation, December 2012, http://www.gsweventcenter.com/Appeal_Response_References/2012_1201_BAAQMD.pdf accessed May 25, 2018.

21 City and County of San Francisco. Air Quality Community Risk Reduction Plan, http://sf-planning.org/air-quality-community-risk-reduction-plan, accessed June 4, 2018.

Model results were used to identify areas in the city with poor air quality, termed Air Pollutant Exposure Zones (APEZs), based on the following health-protective criteria: (1) cumulative $PM_{2.5}$ concentrations greater than 10 μg/m^3; and/or (2) excess cancer risk from the contribution of emissions from all modeled sources greater than 100 per 1 million persons exposed.

An additional health vulnerability layer was incorporated in the APEZ for those San Francisco ZIP codes in the worst quintile of Bay Area Health Vulnerability scores (ZIP Codes 94102, 94103, 94105, 94124, and 94130). In these areas, the standard for identifying areas as being within the zone were lowered to (1) excess cancer risk from the contribution of emissions from all modeled sources greater than 90 per 1 million persons exposed; and/or (2) cumulative $PM_{2.5}$ concentrations greater than 9 μg/m^3.

Lastly, all parcels within 500 feet of a major freeway were also included in the APEZ, consistent with findings in the air resources board's *Air Quality and Land Use Handbook: A Community Health Perspective*, which suggests air pollutant levels decrease substantially at approximately 500 feet from a freeway.[22]

Citywide modeling results indicate that the project site at 3333 California Street is not located in an area that meets the APEZ criteria. The nearest area that meets the APEZ criteria is approximately 2,000 feet southeast of the project site.

Fine Particulate Matter

In April 2011, the U.S. EPA published *Policy Assessment for the Particulate Matter Review of the National Ambient Air Quality Standards*. In this document, U.S. EPA staff conclude that the then-current federal annual $PM_{2.5}$ standard of 15 μg/m^3 should be revised to a level within the range of 13 to 11 μg/m^3, with evidence strongly supporting a standard within the range of 12 to 11 μg/m^3. APEZs for San Francisco are based on the health-protective $PM_{2.5}$ standard of 11 μg/m^3, as supported by the U.S. EPA's *Policy Assessment for the Particulate Matter Review of the National Ambient Air Quality Standards*, although lowered to 10 μg/m^3 to account for uncertainty in accurately predicting air pollutant concentrations using emissions modeling programs.

Excess Cancer Risk

The 100-per-1-million-persons-exposed (100 excess cancer risk) criterion discussed in "San Francisco Modeling of Air Pollution Exposure Zones," pp. 4.E.12-4.E.13, is based on U.S. EPA guidance for conducting air toxic analyses and making risk management decisions at the facility

22 CARB, *Air Quality and Land Use Handbook: A Community Health Perspective*, April 2005, http://www.arb.ca.gov/ch/handbook.pdf, accessed May 25, 2018.

and community-scale level.[23] As described by the air district, the U.S. EPA considers a cancer risk of 100 per 1 million or less to be within the “acceptable” range of cancer risk. Furthermore, in the 1989 preamble to the benzene National Emissions Standards for Hazardous Air Pollutants rulemaking,[24] the U.S. EPA states that it “…strives to provide maximum feasible protection against risks to health from hazardous air pollutants by (1) protecting the greatest number of persons possible to an individual lifetime risk level no higher than approximately one in one million and (2) limiting to no higher than approximately one in ten thousand [100 in one million] the estimated risk that a person living near a plant would have if he or she were exposed to the maximum pollutant concentrations for 70 years.” The 100-per-1-million-excess-cancer-cases criterion is also consistent with the ambient cancer risk in the most pristine portions of the Bay Area based on the air district’s regional modeling.[25]

In addition to monitoring criteria pollutants, both the air district and the air resources board operate TAC monitoring networks in the San Francisco Bay Area Air Basin. These stations measure 10 to 15 TACs, depending on the station. The TACs selected for monitoring are those that traditionally have been found in the highest concentrations in ambient air and therefore tend to produce the most significant risk. The air district’s ambient TAC monitoring station nearest to the project area is at 10 Arkansas Street, approximately 3 miles southeast of the project site. The ambient concentrations of carcinogenic TACs measured at the Arkansas Street station are presented in Table 4.E.4: 2017 Annual Average Ambient Concentrations of Carcinogenic Toxic Air Contaminants. The estimated cancer risk from a lifetime exposure (70 years) to these substances is also shown in Table 4.E.4.

When TAC measurements at this station are compared to ambient concentrations of various TACs for the Bay Area as a whole, the cancer risks associated with mean TAC concentrations in San Francisco are similar to those for the Bay Area as a whole. Therefore, the estimated average lifetime cancer risk resulting from exposure to TAC concentrations monitored at the San Francisco station does not appear to be any greater than that for the Bay Area as a region.

Roadway-Related Pollutants

Motor vehicles are responsible for a large share of air pollution, especially in California. Vehicle tailpipe emissions contain diverse forms of particles and gases, and vehicles also contribute to particulates by generating road dust through tire wear. Epidemiological studies have demonstrated

[23] BAAQMD, Revised Draft Options and Justification Report, California Environmental Quality Act Thresholds of Significance, October 2009, p. 67, http://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/revised-draft-ceqa-thresholds-justification-report-oct-2009.pdf?la=en, accessed August 6, 2018.

[24] 54 Federal Register 38044, September 14, 1989.

[25] BAAQMD, Revised Draft Options and Justification Report, California Environmental Quality Act Thresholds of Significance, October 2009, p. 67.

Table 4.E.4: 2017 Annual Average Ambient Concentrations of Carcinogenic Toxic Air Contaminants

Substance	Concentration NOTE A	Cancer Risk per Million NOTE B
Gaseous TACs (ppb)		
Acetaldehyde	0.69	10
Benzene	0.216	56
1,3-Butadiene	0.036	39
Carbon Tetrachloride	*	*
Chloroform	0.028	2
Para-Dichlorobenzene	*	*
cis-1,3-Dichloropropene	0.05	10
trans-1,3-Dichloropropene	0.05	10
Ethyl Benzene	0.11	3
Ethylene Dibromide	*	*
Ethylene Dichloride	*	*
Formaldehyde	1.64	35
Methyl Tertiary-Butyl Ether (MTBE)	*	*
Methylene Chloride	0.114	1
Perchloroethylene	0.009	1
Trichloroethylene	0.010	0.3
Polycyclic Aromatic Hydrocarbons (ng/m^3)		
Benzo(a)pyrene	*	*
Benzo(b)fluoranthene	*	*
Benzo(k)fluoranthene	*	*
Dibenz(a,h)anthracene	*	*
Indeno(1,2,3-cd)pyrene	*	*
Particulate TACs (ng/m^3)		
Arsenic	0.92	9
Beryllium	0.150	1
Cadmium	0.70	9
Chromium (Hexavalent)	*	*
Lead	*	*
Nickel	3.2	2
Total Risk for All TACs		**188**

Notes: TACs = toxic air contaminants; BAAQMD = Bay Area Air Quality Management District; ppb = part per billion; ng/m^3 = nanograms per cubic meter; *= indicates that insufficient or no data were available to determine the value

A Measured at BAAQMD Monitoring Station at 10 Arkansas Street in San Francisco.

B The potential cancer risk estimates reflect the most recent risk assessment methodology finalized by the Office of Environmental Health Hazard Assessment on March 6, 2015. Information on the agency's new risk assessment methodology can be found at http://www.oehha.ca.gov/air/hot_spots/hotspots2015.html.

Source: CARB, Annual Toxics Summaries by Monitoring Site – 2017

that people living close to freeways or busy roadways have poorer health outcomes, including increased asthma symptoms and respiratory infections, and decreased pulmonary function and lung development in children. Air pollution monitoring conducted in conjunction with epidemiological studies has confirmed that roadway-related health effects vary with modeled exposure to PM and NO_2. In traffic-related studies, the additional non-cancer health risk attributable to roadway proximity was seen within 1,000 feet of the roadway and was strongest within 300 feet.[26] As a result, the air resources board recommends that new sensitive land uses not be located within 500 feet of a freeway or urban roads carrying 100,000 vehicles per day.

Diesel Particulate Matter

As stated on p. 4.E.12, the air resources board identified DPM as a TAC in 1998, primarily based on evidence demonstrating cancer effects in humans. The exhaust from diesel engines includes hundreds of different gaseous and particulate components, many of which are toxic. Mobile sources such as trucks and buses are among the primary sources of diesel emissions, and concentrations of DPM are higher near heavily traveled highways. The air resources board estimated that, as of 2000, the average Bay Area cancer risk from exposure to DPM, based on a population-weighted average ambient DPM concentration, is approximately 480 in 1 million, which is much higher than the risk associated with any other toxic air pollutant routinely measured in the region. The statewide risk from DPM as determined by the air resources board declined from 750 in 1 million in 1990 to 570 in 1 million in 1995; by 2000, the air resources board estimated the average statewide cancer risk from DPM at 540 in 1 million.[27,28]

In 2000, the air resources board approved a comprehensive Diesel Risk Reduction Plan to reduce diesel emissions from both new and existing diesel-fueled vehicles and engines. Subsequent regulations approved by the air resources board apply to new trucks and diesel fuel. With new controls and fuel requirements, a medium-heavy duty or heavy-heavy duty truck built in 2010 or later would have particulate exhaust emissions that are over 50 times lower than a medium-heavy duty or heavy-heavy duty truck built before 1990.[29] The regulations are anticipated to result in an 80 percent decrease in statewide diesel health risk in 2020 as compared with the diesel risk in 2000. Despite notable emission reductions, the air resources board recommends that proximity to sources of DPM emissions be considered in the siting of new sensitive land uses. The air resources board notes that these recommendations are advisory and should not be interpreted as defined "buffer zones," and that local agencies must balance other considerations, including transportation needs,

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[26] CARB, *Air Quality and Land Use Handbook: A Community Health Perspective*, April 2005, https://www.arb.ca.gov/ch/handbook.pdf, accessed May 25, 2018.

[27] CARB, *California Almanac of Emissions and Air Quality* - 2009 Edition, Table 5-44 and Figure 5-12, http://www.arb.ca.gov/aqd/almanac/almanac09/chap509.htm, accessed May 25, 2018.

[28] This calculated cancer risk value from ambient air exposure in the Bay Area can be compared against the lifetime probability of being diagnosed with cancer in the United States, from all causes, which for men is more than 40 percent (based on a sampling of 17 regions nationwide), or greater than 400,000 in 1 million, according to the American Cancer Society. American Cancer Society, last revised March 23, 2016, http://www.cancer.org/cancer/cancerbasics/lifetime-probability-of-developing-or-dying-from-cancer, accessed May 25, 2018.

[29] Pollution Engineering, New Clean Diesel Fuel Rules Start, July 2006 and CARB, Methods to Find the Cost-Effectiveness of Funding Air Quality Projects For Evaluating Motor Vehicle Registration Fee Projects and Congestion Mitigation and Air Quality Improvement (CMAQ) Projects, Table 5-A, https://www.arb.ca.gov/planning/tsaq/eval/evaltables.pdf, accessed May 25, 2018.

the benefits of urban infill, community economic development priorities, and other quality of life issues. The position of the air resources board is that with careful evaluation of exposure, health risks, and affirmative steps to reduce risk where necessary, infill development, mixed-use, higher density, transit-oriented development, and other concepts that benefit regional air quality can be compatible with protecting the health of individuals at the neighborhood level.[30]

SENSITIVE RECEPTORS

Air quality does not affect every individual in the population in the same way, and some groups are more sensitive to adverse health effects than others. Population subgroups sensitive to the health effects of air pollutants include the elderly and the young; those with higher rates of respiratory disease, such as asthma and chronic obstructive pulmonary disease; and those with other environmental or occupational health exposures (e.g., indoor air quality) that affect cardiovascular or respiratory diseases. The air district defines sensitive receptors as children, adults, and seniors occupying or residing in residential dwellings, schools, daycare centers, hospitals, and senior-care facilities. Workers are not considered sensitive receptors because all employers must follow regulations set forth by the Occupation Safety and Health Administration to ensure the health and well-being of their employees.[31]

The proximity of sensitive receptors to motor vehicles is an air pollution concern, especially in San Francisco where building setbacks are limited and roadway volumes are higher than most other parts of the Bay Area. Vehicles also contribute to particulates by generating road dust and through tire wear.

Existing receptors evaluated in this analysis include a representative sample of known residents (children and adults) in the surrounding neighborhood, and other sensitive receptors (school children, inpatient hospital/nursing home patients, etc.) located in the surrounding community and along the expected travel routes of the on-road delivery and haul trucks. The health risk impact analysis includes receptor locations out to a distance of 1,000 meters from the project site, which is conservative because the maximum impacts identified from the project and project variant would be adjacent to the site. In addition to the residential receptors, other sensitive receptors were identified within 1,000 meters of the project site. The closest non-residential sensitive receptors include Laurel Hill Nursery School, San Francisco University High School - South Campus, Little School, Havurah Youth Center, the Helen Diller Family Preschool at the Jewish Community Center of San Francisco, the Menorah Park Assisted Living Senior Housing Complex, and the Chibi Chan Preschool at the Booker T. Washington Community Center. There is also an in-patient care medical

[30] CARB, *Air Quality and Land Use Handbook: A Community Health Perspective*, April 2005, http://www.arb.ca.gov/ch/handbook.pdf, accessed May 25, 2018.
[31] BAAQMD, Recommended Methods for Screening and Modeling Local Risks and Hazards, May 2011, p. 12.

facility located at the California Pacific Medical Center's California Campus (3700 California Street).[32] These sensitive receptors were not evaluated separately from residences because the residences are closer to the project site and would have longer exposure durations and are therefore expected to have greater health impacts.

The project site is not located within an area that meets the APEZ criteria. Background cancer risk values on the project site are between 11 and 40 in 1 million, with background values ranging from 1.6 to 153 in 1 million within 1,000 meters of the site.[33] Background $PM_{2.5}$ concentrations range from 8.2 to 8.7 µg/m^3 on the project site, with background values varying between 8.1 and 10.5 µg/m^3 within 1,000 meters of the site. The nearest off-site receptors within an APEZ are located approximately 2,000 feet (about 610 meters) to the southeast.

EXISTING STATIONARY SOURCES OF AIR POLLUTION

The air district's inventory of permitted stationary sources of emissions shows approximately six permitted stationary emission sources within or near the 1,000-foot zone of influence[34] of the project site. These sources include two autobody shops, a drycleaner, a complex with retail and other businesses, the Jewish Community Center, and the San Francisco Municipal Railway's Presidio Division and Yard (a bus storage and maintenance depot at 875 Presidio Avenue, across Euclid and Masonic avenues south of the project site). In addition, the California Pacific Medical Center's California Campus at 3700 California Street is situated just beyond 1,320 feet to the west of the project site. Of these sources, emissions from the California Pacific Medical Center's California Campus results in the largest estimated cancer risk and $PM_{2.5}$ concentration because the California Pacific Medical Center's California Campus has the greatest number of stationary

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[32] Massehian, Vahram, Sutter Health, e-mail correspondence with Julie Moore, Senior Environmental Planner, San Francisco Planning Department, January 12, 2018. Sutter Health is expected to vacate the California Pacific Medical Center's California Campus and move to a new location at the end of 2019/beginning of 2020. Redevelopment of the site is expected to include residential uses. As such, this location was evaluated as a residential receptor.

[33] SFDPH, Article 38 of the San Francisco Health Code, https://www.sfdph.org/dph/eh/Air/Article38.asp, accessed May 25, 2018.

[34] For assessing community risks and hazards, an area of influence, i.e., a 1,000-foot radius distance buffer around the project site boundary, is recommended. The air district recommends that any proposed project that includes the siting of a new source or receptor assess associated impacts within 1,000 feet, taking into account both individual and nearby cumulative sources.

sources of air pollution.[35] All of these sources contribute to the background levels of cancer risk and $PM_{2.5}$ concentration discussed on p. 4.E.18.

MAJOR ROADWAYS CONTRIBUTING TO AIR POLLUTION

California Street, Masonic Avenue, Pine Street, Euclid Avenue, and Bush Street are arterial roadways in the existing local roadway system within 1,000 feet of the project site that carry at least 10,000 vehicles in annual average daily traffic, based on data provided by the transportation consultant and presented in the Travel Demand Memorandum.[36,37] This traffic contributes to concentrations of $PM_{2.5}$, DPM, and other air contaminants emitted from motor vehicles near the street level. Aside from the surrounding major roadways, the only other area of mobile-source activity or otherwise "non-permitted" sources (e.g., railyards, trucking distribution facilities, and high-volume fueling stations) located within 1,000 feet of the project site is the San Francisco Municipal Railway's Presidio Division and Yard. As noted above, the Presidio Division and Yard also operates stationary sources of air pollution.

REGULATORY FRAMEWORK

FEDERAL REGULATIONS

Federal Clean Air Act

The 1970 Clean Air Act (last amended in 1990) requires that regional planning and air pollution control agencies prepare a regional air quality plan to outline the measures by which both stationary and mobile sources of pollutants are planned to be controlled in order to achieve all standards by the deadlines specified in the act. These ambient air quality standards are intended to protect the public health and welfare, and they specify the concentration of pollutants (with an ample margin of safety) to which the public can be exposed without adverse health effects. They are designed in consideration of those segments of the public most susceptible to respiratory distress, including

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[35] Massehian, Vahram, Sutter Health, e-mail correspondence with Julie Moore, Senior Environmental Planner, San Francisco Planning Department, January 12, 2018. The California Pacific Medical Center's California Campus is expected to cease operation and be moved to a new location by the end of 2019/beginning of 2020 and is anticipated to be redeveloped as residential use, which would likely not use the stationary sources of air emissions currently in use at the hospital (e.g., large-scale emergency back-up generators). Therefore, because the cancer risk and $PM_{2.5}$ concentrations from the generators at the California Pacific Medical Center's California Campus have not been removed from the background levels for this analysis, the background risk and $PM_{2.5}$ concentrations from these sources would be conservative (i.e., higher than anticipated) as they would likely cease operation during the exposure period evaluated.

[36] Kittelson & Associates, Travel Demand Memorandum, Case No. 2015-014028ENV, March 9, 2018. (See EIR Appendix D: Transportation and Circulation Calculation Details and Supporting Information.)

[37] BAAQMD, Recommended Methods for Screening and Modeling Local Risks and Hazards, May 2011, p. 12. According to the air district, roads with less than 10,000 vehicles per day do not pose a significant health impact even in combination with other nearby sources. Thus, only arterial roadways with greater than 10,000 vehicles per day were included in this analysis.

asthmatics, the very young, the elderly, people weak from other illness or disease, or persons engaged in strenuous work or exercise. Healthy adults can tolerate occasional exposure to air pollution levels that are somewhat above ambient air quality standards without observing adverse health effects.

The current attainment status for the San Francisco Bay Area Air Basin, with respect to federal standards, is summarized in Table 4.E.2, pp. 4.E.7-4.E.8. In general, the air basin experiences low concentrations of most pollutants when compared to federal standards, except for PM (PM_{10} and $PM_{2.5}$) for which standards are exceeded periodically (see Table 4.E.1, p. 4.E.4).

Emission Standards for New Off-Road Equipment

Before 1994, there were no standards to limit the amount of emissions from off-road equipment, which includes construction equipment. In 1994, U.S. EPA established emission standards for hydrocarbons, NOx, CO, and PM to regulate new pieces of off-road equipment. These emission standards came to be known as Tier 1. Since that time, increasingly more stringent Tier 2, Tier 3, and Tier 4 (interim and final) standards were adopted by U.S. EPA, as well as by the air resources board. Each adopted emission standard was phased in over time. New engines built in and after 2015 across all horsepower sizes must meet Tier 4 final emission standards. In other words, new manufactured engines cannot exceed the emissions established for Tier 4 final emissions standards.

STATE REGULATIONS

California Clean Air Act

Although the Federal Clean Air Act established national ambient air quality standards, individual states retained the option to adopt more stringent standards and to include other pollution sources. California had already established its own air quality standards when federal standards were established, and because of the unique meteorological problems in California, there is considerable diversity between the state and national ambient air quality standards, as shown in Table 4.E.2, pp. 4.E.7-4.E.8. California ambient standards are at least as protective as national ambient standards and are often more stringent.

In 1988, California passed the California Clean Air Act (California Health and Safety Code sections 39600 et seq.), which, like its federal counterpart, required the designation of areas as attainment or non-attainment, but based these designations on state ambient air quality standards rather than the federal standards. As indicated in Table 4.E.2, pp. 4.E.7-4.E.8, the San Francisco Bay Area Air Basin is designated as “non-attainment” for state ozone, PM_{10}, and $PM_{2.5}$ standards, and as “attainment” or “unclassified” for other pollutants.

Toxic Air Contaminants

In 2005, the air resources board approved a regulatory measure to reduce emissions of toxic and criteria pollutants by limiting the idling of new heavy-duty diesel vehicles. The regulations generally limit idling of commercial motor vehicles (including buses and trucks) within 100 feet of a school or residential area for more than five consecutive minutes or periods aggregating more than five minutes in any one hour. Buses or vehicles also must turn off their engines upon stopping at a school and must not turn their engines on more than 30 seconds before beginning to depart from a school. Also, state law Senate Bill 352 was adopted in 2003 and limits locating public schools within 500 feet of a freeway or busy traffic corridor (Education Code section 17213; Public Resources Code section 21151.8).

Tanner Air Toxics Act and Air Toxics Hot Spots Information and Assessment Act

TACs in California are primarily regulated through the Tanner Air Toxics Act (Assembly Bill 1807) and the Air Toxics Hot Spots Information and Assessment Act of 1987 (Assembly Bill 2588), also known as the Hot Spots Act. To date, the air resources board has identified more than 21 TACs and has adopted U.S. EPA's list of hazardous air pollutants as TACs.

California Air Resources Board's In-Use Off-Road Diesel-Fueled Fleets Regulation

In 2007, the air resources board adopted a regulation to reduce diesel PM and NOx emissions from in-use off-road heavy-duty diesel vehicles in California.[38] The regulation imposes limits on vehicle idling and requires fleets to reduce emissions by retiring, replacing, repowering, or installing exhaust retrofits on older engines. In December 2010, major amendments were made to the regulation, including a delay of the first performance standards compliance date to no earlier than January 1, 2014.

REGIONAL REGULATIONS AND PLANS

Bay Area Air Quality Management District

The Bay Area Air Quality Management District is the regional agency with jurisdiction over the nine-county region located in the San Francisco Bay Area Air Basin. The Association of Bay Area Governments, Metropolitan Transportation Commission, county transportation agencies, cities and counties, and various non-governmental organizations also participate in the efforts to improve air quality through a variety of programs. These programs include the adoption of regulations and policies, as well as implementation of extensive education and public outreach programs. The air district is responsible for attaining and maintaining air quality in the region within federal and state air quality standards. Specifically, the air district has the responsibility to monitor ambient air

[38] California Code of Regulations, title 13, sections 2449, 2449.1, 2449.2, and 2449.3.

pollutant levels throughout the region and to develop and implement strategies to attain the applicable federal and state standards.

The air district does not have authority to regulate emissions from motor vehicles. Specific rules and regulations adopted by the air district limit the emissions that can be generated by various stationary sources, and identify specific pollution reduction measures that must be implemented in association with various activities. These rules regulate not only emissions of the six criteria air pollutants, but TAC emissions sources are also subject to these rules and are regulated through the district's permitting process and standards of operation.

Through this permitting process, including an annual permit review, the air district monitors the generation of stationary emissions and uses this information in developing its air quality plans. Any sources of stationary emissions constructed as part of the proposed project or project variant would be subject to the air district's Rules and Regulations. Both federal and state ozone plans rely heavily on stationary source control measures set forth in the air district's Rules and Regulations.

In accordance with its *Engineering Division Policy and Procedure Manual*,[39] the air district requires implementation of best available control technology for toxics and would deny an authority to construct or a permit to operate for any new or modified source of TACs that exceeds a cancer risk of 10 in 1 million or a chronic or acute hazard index of 1.0. The permitting process under the air district's Regulation 2, Rule 5 requires a health risk screening analysis, the results of which are posted on the air district's website.

2017 Bay Area Clean Air Plan

The air district adopted the *Bay Area Clean Air Plan: Spare the Air, Cool the Climate* on April 19, 2017, to provide a regional strategy to improve Bay Area air quality and meet public health goals.[40] The control strategy described in the 2017 Bay Area Clean Air Plan includes a wide range of control measures designed to reduce emissions and lower ambient concentrations of harmful pollutants, safeguard public health by reducing exposure to air pollutants that pose the greatest health risk, and reduce GHG emissions to protect the climate.

The 2017 Bay Area Clean Air Plan addresses four categories of pollutants: ground-level ozone and its key precursors, ROG and NOx; PM, primarily $PM_{2.5}$, and precursors to secondary $PM_{2.5}$; air toxics; and GHGs. The control measures are categorized based on the economic sector framework

39 BAAQMD, *Engineering Division Policy and Procedure Manual*, September 2015, http://www.baaqmd.gov/~/media/files/engineering/policy_and_procedures/engineering-policy-and-procedure-manual.pdf?la=en, accessed May 25, 2018.

40 BAAQMD, *2017 Bay Area Clean Air Plan: Spare the Air, Cool the Climate. A Blueprint for Clean Air and Climate Protection in the Bay Area*, April 19, 2017, http://www.baaqmd.gov/~/media/files/planning-and-research/plans/2017-clean-air-plan/attachment-a_-proposed-final-cap-vol-1-pdf.pdf?la=en, accessed May 25, 2018.

including stationary sources, transportation, energy, buildings, agriculture, natural and working lands, waste management, and water measures.

Particulate Matter Plan

To fulfil federal air quality planning requirements, the air district adopted a $PM_{2.5}$ emissions inventory for year 2010 at a public hearing on November 7, 2012. The 2017 Bay Area Clean Air Plan also included several measures for reducing PM emissions from stationary sources and wood burning. On January 9, 2013, U.S. EPA issued a final rule determining that the Bay Area has attained the 24-hour $PM_{2.5}$ national ambient air quality standard, suspending federal State Implementation Plan planning requirements for the San Francisco Bay Area Air Basin.[41] Despite this U.S. EPA action, the air basin will continue to be designated as non-attainment for the national 24-hour $PM_{2.5}$ standard until the air district submits a redesignation request and a maintenance plan to U.S. EPA, and U.S. EPA approves the proposed redesignation.

2001 Ozone Attainment Plan

BAAQMD adopted the *Bay Area Ozone Attainment Plan* in 2001 in response to U.S. EPA's finding that the Bay Area had failed to attain the national ambient air quality standard for ozone. The plan includes a control strategy for ozone and its precursors to ensure a reduction in emissions from stationary sources, mobile sources, and the transportation sector.[42]

Regulation 2, Rule 5

The air district regulates back-up emergency generators, fire pumps, and other sources of TACs through its New Source Review (Regulation 2, Rule 5) permitting process.[43] Although emergency generators are intended to be used only during periods of power outages, monthly testing of each generator is required; however, the air district limits testing to no more than 50 hours per year. Each emergency generator installed is assumed to meet a minimum of Tier 2 emission standards (before control measures). As part of the permitting process, the air district limits the excess cancer risk from any facility to no more than 10 per 1 million population for any permits that are applied for within a two-year period and would require any source that would result in an excess cancer risk greater than 1 per 1 million to install Best Available Control Technology for Toxics.

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[41] U.S. EPA, Determination of Attainment for the San Francisco Bay Area Nonattainment Area for the 2006 Fine Particle Standard; California; Determination Regarding Applicability of Clean Air Act Requirements, January 9, 2013, https://www.federalregister.gov/documents/2013/01/09/2013-00170/determination-of-attainment-for-the-san-francisco-bay-area-nonattainment-area-for-the-2006-fine, accessed May 25, 2018.

[42] BAAQMD, Revised San Francisco Bay Area Ozone Attainment Plan for the 1-Hour National Ozone Standard, adopted October 24, 2001, http://www.baaqmd.gov/~/media/files/planning-and-research/plans/2001-ozone-attainment-plan/oap_2001.pdf, accessed May 25, 2018.

[43] BAAQMD, Regulation 2, Permits; Rule 5, New Source Review of Toxic Air Contaminants, December 2016, http://www.baaqmd.gov/~/media/files/planning-and-research/rules-and-regs/reg-02/rg0205_120716-pdf.pdf?la=en, accessed October 19, 2017.

Association of Bay Area Governments and Metropolitan Transportation Commission Plan Bay Area

On July 18, 2013, the Metropolitan Transportation Commission and the Association of Bay Area Governments approved *Plan Bay Area*. *Plan Bay Area* includes integrated land use and transportation strategies for the region and was developed through OneBayArea, a joint initiative between the Association of Bay Area Governments, the air district, the Metropolitan Transportation Commission, and the San Francisco Bay Conservation and Development Commission. The plan's transportation policies focus on maintaining the extensive existing transportation network and using these systems more efficiently to handle density in Bay Area transportation cores.[44] Assumptions for land use development are from local and regional planning documents. Emission forecasts in the 2017 Bay Area Clean Air Plan rely on projections of vehicle miles traveled, population, employment, and land use projections made by local jurisdictions during development of *Plan Bay Area.*

In July 2017, the Metropolitan Transportation Commission and the Association of Bay Area Governments adopted an update to the 2013 plan: *Plan Bay Area 2040*. The updated plan addresses housing and economic issues and provides strategies to address the area's transportation and land use goals. The plan's land use and transportation pattern achieves the two mandated requirements for a reduction in per-capita CO_2 emissions from passenger vehicles and adequate housing for the Bay Area's expected population growth through 2040.[45]

LOCAL REGULATIONS AND PLANS

San Francisco General Plan Air Quality Element

The *San Francisco General Plan* (general plan) includes the 1997 Air Quality Element.[46] The objectives specified by the city include the following:

Objective 1: Adhere to state and federal air quality standards and regional programs.

Objective 2: Reduce mobile sources of air pollution through implementation of the Transportation Element of the General Plan.

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[44] Association of Bay Area Governments and Metropolitan Transportation Commission, Plan Bay Area: Regional Transportation Plan and Sustainable Communities Strategy for the San Francisco Bay Area, 2013–2040, adopted July 18, 2013, https://mtc.ca.gov/our-work/plans-projects/plan-bay-area-2040/plan-bay-area, accessed May 25, 2018.

[45] Association of Bay Area Governments and Metropolitan Transportation Commission, Plan Bay Area 2040: Regional Transportation Plan and Sustainable Communities Strategy for the San Francisco Bay Area, 2017–2040, adopted July 26, 2017, http://2040.planbayarea.org/reports and http://2040.planbayarea.org/cdn/farfuture/u_7TKELkH2s3AAiOhCyh9Q9QlWEZIdYcJzi2QDCZuIs/1510696833/sites/default/files/2017-11/Final_Plan_Bay_Area_2040.pdf, accessed May 25, 2018.

[46] San Francisco Planning Department, Air Quality Element of the *San Francisco General Plan*, July 1997, updated in 2000.

Objective 3: Decrease the air quality impacts of development by coordination of land use and transportation decisions.

Objective 4: Improve air quality by increasing public awareness regarding the negative health effects of pollutants generated by stationary and mobile sources.

Objective 5: Minimize particulate matter emissions from road and construction sites.

Objective 6: Link the positive effects of energy conservation and waste management to emission reductions.

San Francisco Construction Dust Control Ordinance

The city has adopted San Francisco Health Code article 22B and San Francisco Building Code section 106.A.3.2.6, which collectively constitute the Construction Dust Control Ordinance. The ordinance requires that all site preparation work, demolition, or other construction activities within San Francisco that have the potential to create dust or to expose or disturb more than 10 cubic yards or 500 square feet of soil comply with specified dust control measures whether or not the activity requires a permit from the Department of Building Inspection. For projects over 0.5 acre, the Construction Dust Control Ordinance requires that the project sponsor submit a dust control plan for approval by the San Francisco Department of Public Health prior to issuance of a building permit by the Department of Building Inspection.

Building permits will not be issued without written notification from the Director of Public Health stating that the applicant has a site-specific dust control plan, unless the director waives the requirement. The Construction Dust Control Ordinance requires project sponsors and contractors responsible for construction activities to control construction dust on the site or implement other practices that result in equivalent dust control that are acceptable to the Director of Public Health.

Dust suppression activities may include watering all active construction areas sufficiently to prevent dust from becoming airborne; increased watering frequency may be necessary whenever wind speeds exceed 15 miles per hour. Reclaimed water must be used if required by article 21, section 1100 et seq. of the San Francisco Public Works Code.

The project site is 10.25 acres in size, and therefore the project sponsor would be required to prepare a construction dust control plan for approval by the San Francisco Department of Public Health.

San Francisco Health Code Provisions for Urban Infill Development (Article 38)

San Francisco adopted article 38 of the San Francisco Health Code in 2008, with revisions that took effect in December 2014. The revised code requires that sensitive land use developments within mapped Air Pollutant Exposure Zones incorporate Minimum Efficiency Reporting Value 13

(MERV-13) or equivalent ventilation systems to remove particulates from outdoor air.[47] This regulation also applies to conversion of uses to a sensitive use (such as a residential use, a senior care facility, or a daycare center). Article 38 is not applicable to the proposed project or project variant because the project site is not located within a mapped Air Pollution Exposure Zone according to the San Francisco Department of Public Health.[48]

IMPACTS AND MITIGATION MEASURES

SIGNIFICANCE THRESHOLDS

For the impacts analyzed in this section, the proposed project or project variant would have a significant impact related to air quality if it were to:

- Conflict with or obstruct implementation of the applicable air quality plan;
- Violate any air quality standard or contribute substantially to an existing or projected air quality violation;
- Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions that exceed quantitative thresholds for ozone precursors); or
- Expose sensitive receptors to substantial pollutant concentrations.

APPROACH TO ANALYSIS

In general, a project would result in two types of potential air quality impacts: impacts from construction activities, and impacts from project operations due to increased vehicle travel and new stationary sources (e.g., one or more new emergency standby diesel generators). During the approximately seven-year (or longer) construction period for the proposed project or project variant, operation of earlier phases of the proposed project's or project variant's four-phase construction program would overlap with construction of later phases. Overlaps would also occur with a different ordering of the construction phases.

Each of these types of direct impacts is, in turn, separated into impacts from criteria air pollutant emissions, which are generally regional in nature, and impacts associated with exposure to $PM_{2.5}$ and TACs, which are localized health impacts expressed in terms of exposure to $PM_{2.5}$ concentrations and the probability of contracting cancer per 1 million persons exposed to TAC

[47] The MERV rating is a measurement scale designed by the American Society of Heating, Refrigerating and Air-Conditioning Engineers (ASHRAE) to rate the effectiveness of air filters. The scale is designed to represent the worst-case performance of a filter when dealing with particles in the range of 0.3 to 10 micrometers. The MERV rating system ranges from 1 to 16, with higher MERV ratings correspond to a greater percentage of particles captured on each pass.

[48] San Francisco Department of Public Health, Air Pollution Exposure Zone Maps, https://www.sfdph.org/dph/files/EHSdocs/AirQuality/AirPollutantExposureZoneMap.pdf, accessed May 25, 2018.

concentrations. The assessment of criteria air pollutant impacts addresses the second and third bulleted significance thresholds identified above. The assessment of exposure to $PM_{2.5}$ concentrations and excess cancer risk addresses the fourth bulleted significance threshold identified above.

The air quality analysis conducted for this impact assessment uses emission factors, models, and tools distributed by a variety of agencies, including the air resources board, the California Air Pollution Officers Association, the California Office of Environmental Health Hazard Assessment (March 2015), and the U.S. EPA. Additionally, the analysis includes methodologies identified in the BAAQMD CEQA Air Quality Guidelines (May 2017).

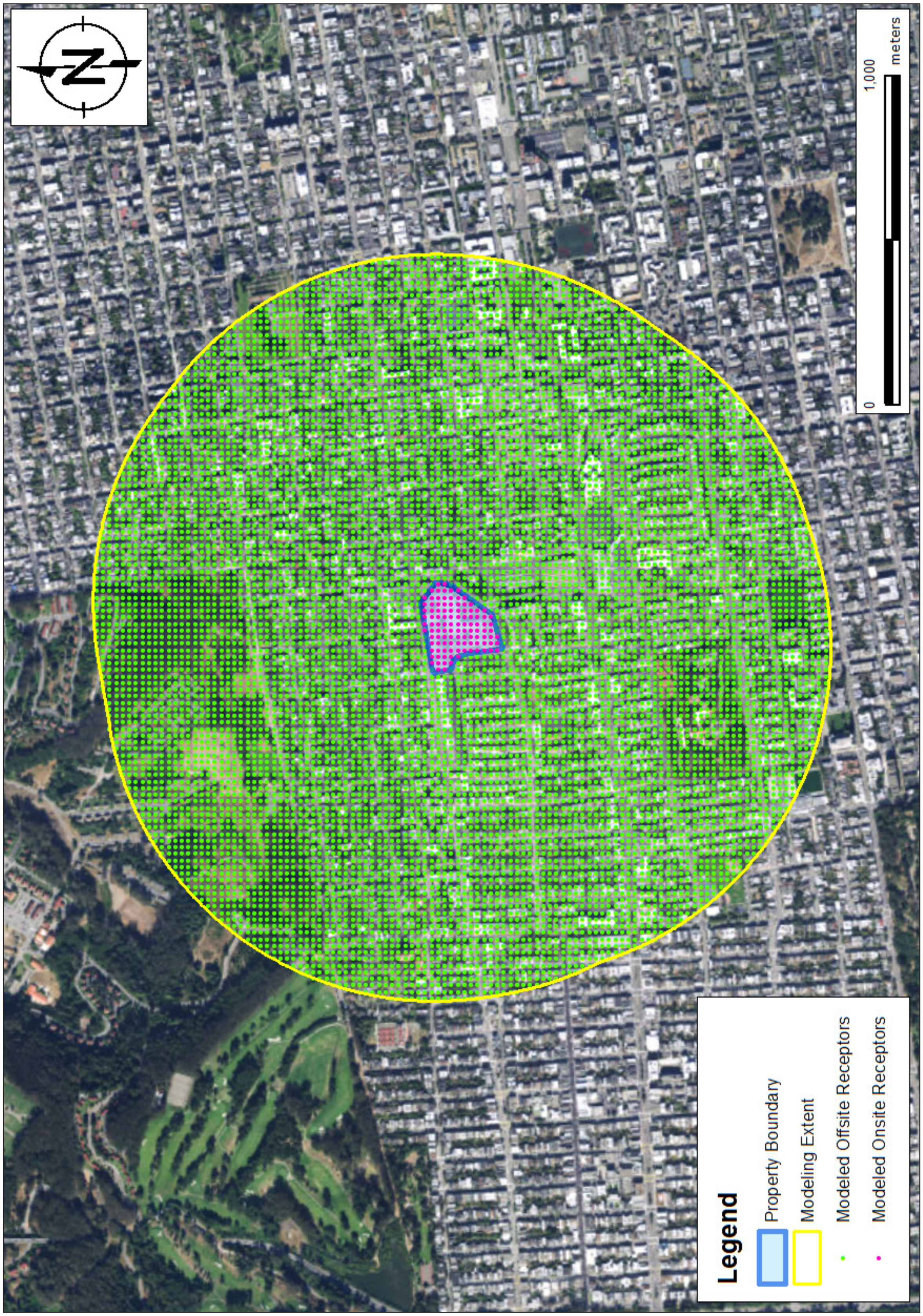
PROJECT FEATURES

Proposed Project

The proposed project would be a residential and commercial development located within a residential neighborhood. Figure 2.1: Project Location, p. 2.3, in Chapter 2, Project Description, shows the location of the proposed project within its neighborhood and the city; Figure 4.E.1: Project Boundary and Air Quality Modeling Extent, below, shows the extent of the area studied for air quality impacts. As discussed on p. 4.E.13, the project site is not located within an Air Pollutant Exposure Zone (APEZ), which is an area designated by the San Francisco Department of Public Health as having poor air quality.[49] The project site is currently developed with a four-story office building at the center of the site, a three-level parking garage, and a one-story annex building. The site currently has a diesel emergency generator located within Basement Level B1 (within a mechanical room in the easternmost circular garage ramp structure) and an above-ground fuel storage tank immediately east of Basement Level B2 near the Presidio Avenue entry driveway. The emergency diesel generator and above-ground fuel storage tank would be removed from the site during Phase 2 of construction, prior to the installation of a new emergency generator.

The existing buildings contain University of California, San Francisco (UCSF) administrative, academic research, social, behavioral, and policy science research department uses, and a daycare center. Prior to commencing Phase 1 of the four-phase construction program for the proposed project or project variant, all existing UCSF uses, including the daycare center, would be moved to other UCSF campuses. The air quality analysis assumes that the residential buildings constructed in each phase of the construction program (i.e., Phase 1, Phase 2, or Phase 3) would be occupied as subsequent phases of the construction program commence, and future residents or daycare center uses would therefore be considered on-site sensitive receptors. This air quality analysis assumes

[49] SFDPH and San Francisco Planning Department, Air Pollutant Exposure Zone Map – Citywide, April 10, 2014, https://www.sfdph.org/dph/files/EHSdocs/AirQuality/AirPollutantExposureZoneMap.pdf, accessed August 6, 2018.



SOURCE: Ramboll

3333 CALIFORNIA STREET MIXED-USE PROJECT

2015-014028ENV

FIGURE 4.E.1: PROJECT BOUNDARY AND AIR QUALITY MODELING EXTENT

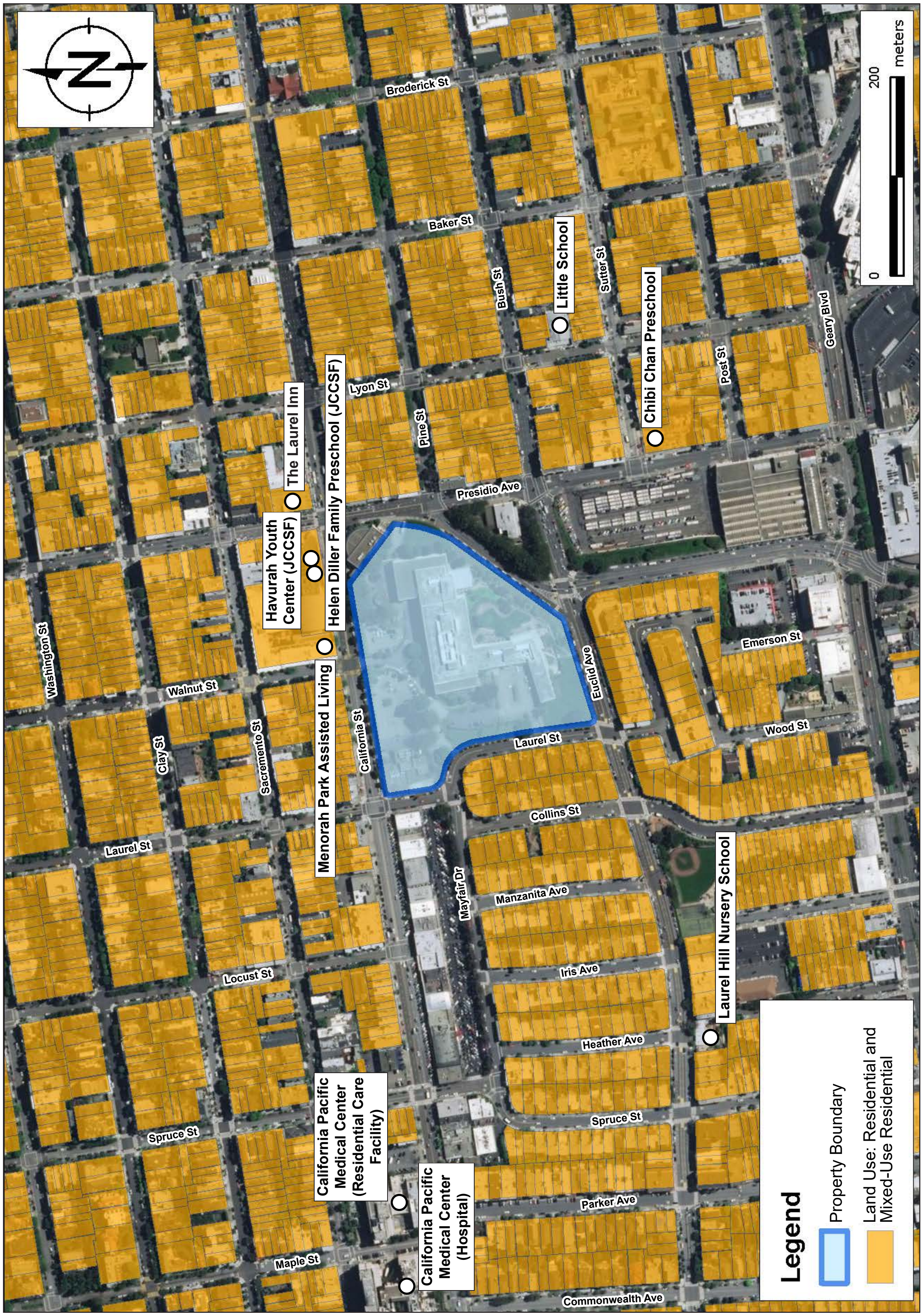
that the project site is surrounded by sensitive receptors, i.e., residential land uses. The locations of residential parcels surrounding the project site are presented in Figure 4.E.2: Sensitive Receptor Parcels in the Immediate Vicinity of Project Site.

The preliminary construction phasing program includes four overlapping phases, with the first phase of the construction program (Phase 1) to commence upon the transition of existing uses at the UCSF Laurel Heights campus to other campuses such as Parnassus and Mission Bay. Construction is expected to begin in 2020 and last approximately seven years or longer. The four-phase construction program is preliminary and the phases could be developed in a different order. Figure 4.E.3: Summary of Preliminary Phasing for Project Construction and Operation, p. 4.E.31, summarizes the anticipated phasing of project construction and operation, based on the conservative assumption that construction would occur over a period of seven years.

Phase 1, including demolition of the annex building and portions of the existing office building, is anticipated to last 30 months. Subsequent to demolition, Phase 1 would consist of the construction of the Masonic and Euclid buildings, proposed to include 196 residential units (266,251 gross square feet), 4,287 gross square feet of retail space, and 87,977 gross square feet of garage, as well as portions of the publicly accessible open spaces.

Phase 2 would last approximately 24 months and would overlap with Phase 1 for approximately 11 months. Demolition under Phase 2 would include, but not be limited to, the demolition of the northern portion of the existing office building and the circular garage ramp structures, the separation of the existing office building into two buildings, and the creation of an interior light well in the remaining portion of the building (on the east side), and its rehabilitation and interior remodel to consist of approximately 190 residential units (320,393 gross square feet) and 23,227 gross square feet of garage space. The existing emergency generator would be removed during this phase of the construction program. The room for the new emergency generator would be constructed as part of Phase 1, and the emergency generator would be installed in Phase 2.

The construction of the California Street buildings (Plaza A, Plaza B, and Walnut buildings) would occur in Phase 3 of the construction program and would take approximately 36 months, overlapping for approximately nine months with Phase 2. Phase 3 would include the construction of 128 residential units (138,370 gross square feet), 49,830 gross square feet of retail space, 49,999 gross square feet of office space, 14,690 gross square feet of daycare center space, and 301,060 gross square feet of garage space, as well as additional outdoor plazas and public spaces. The new daycare facility is planned to be occupied by the end of Phase 3 of the construction program.



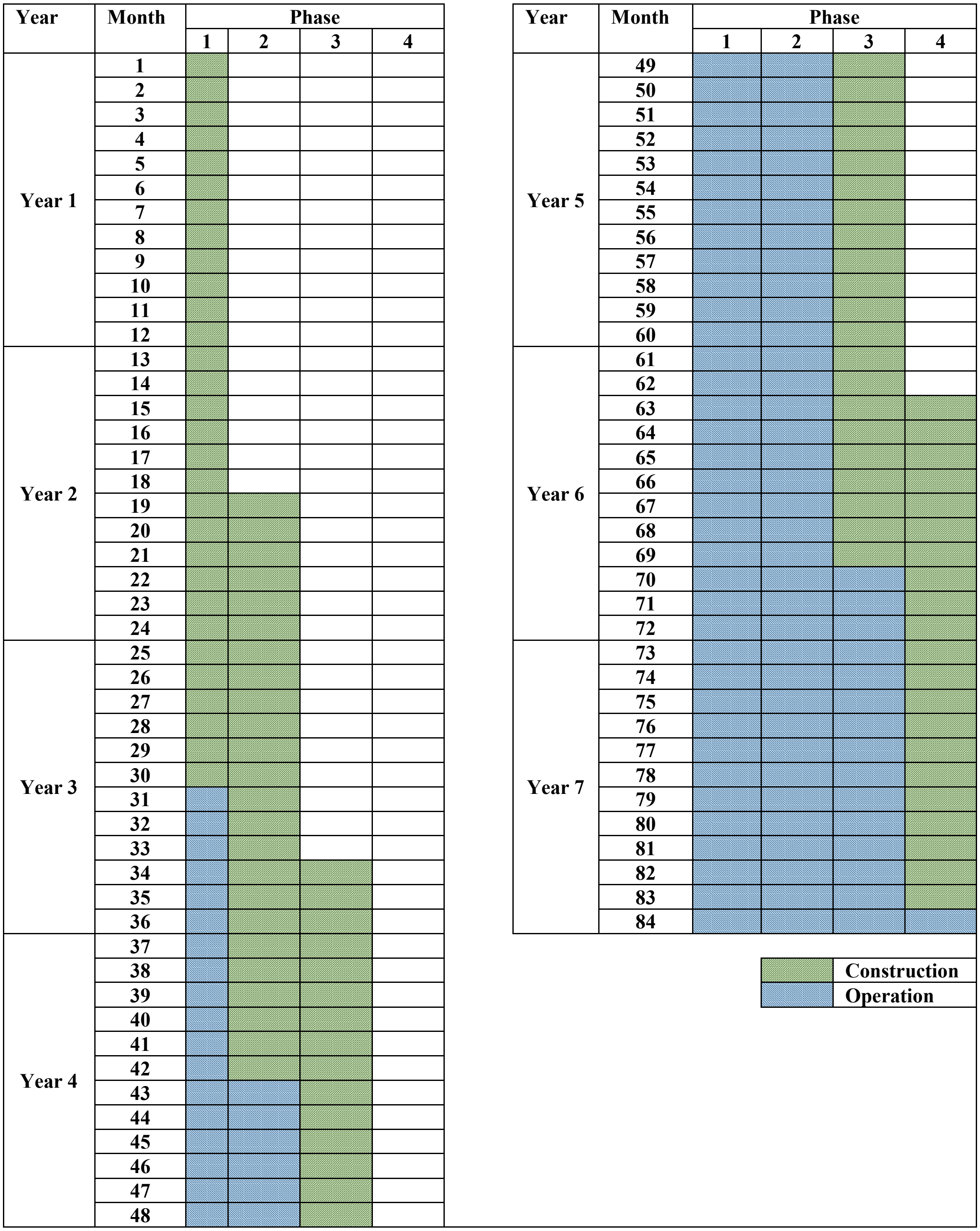
SOURCE: Ramboll

3333 CALIFORNIA STREET MIXED-USE PROJECT

2015-014028ENV

FIGURE 4.E.2: SENSITIVE RECEPTOR PARCELS IN THE IMMEDIATE VICINITY OF THE PROJECT SITE

Figure 4.E.3: Summary of Preliminary Phasing for Project Construction and Operation



Note:
This figure shows overlapping phases of construction and operation for an assumed seven-year construction period. Actual construction may be spaced out over a longer duration, in which case there would be less or no overlap of construction phases. Construction phases could also occur in different order; however, construction phase overlaps would remain but would be slightly different than shown here.

In Phase 4, the Mayfair Building and Laurel Duplexes would be constructed. This phase of the construction program would last approximately 20 months and would overlap for 6 months with Phase 3. Phase 4 includes construction of 97,182 gross square feet of residential space (44 units), 20,478 gross square feet of garage space, and Euclid Green and right-of-way improvements.

Project Variant

Under the Walnut Building Variant, 744 dwelling units would be developed on the project site (186 more than the proposed project). The 49,999 gross square feet of commercial office space in the proposed project's Walnut Building would be modified and expanded to become residential space, and the height of the proposed Walnut Building would be approximately 67 feet (three more levels [or 22 feet taller] than under the proposed project). Overall, the Walnut Building would be approximately 368,170 gross square feet, with 153,920 gross square feet of residential use, 18,800 gross square feet of retail use, 180,800 gross square feet of below-grade garage space, and 14,650 gross square feet of daycare center use. There would be an additional 76 vehicle parking spaces provided under the project variant. The other proposed new buildings would not change relative to the proposed project. The construction phasing program for the project variant would be the same as the proposed project (see Figure 4.E.3, p. 4.E.31).

AIR QUALITY PLAN

The applicable air quality plan is the Bay Area Air Quality Management District's 2017 Bay Area Clean Air Plan. Consistency with the 2017 Bay Area Clean Air Plan can be determined if the project supports the goals of the plan, includes applicable control measures from the plan, and would not disrupt or hinder implementation of any control measures from the plan. Consistency with the 2017 Bay Area Clean Air Plan is the basis for determining whether the proposed project or project variant would conflict with or obstruct implementation of an applicable air quality plan, the first bulleted significance criterion identified on p. 4.E.26.

CRITERIA AIR POLLUTANTS

As described above under "Regulatory Framework," p. 4.E.20, the San Francisco Bay Area Air Basin experiences low concentrations of most pollutants when compared to federal or state standards and is designated as either in attainment or unclassified for most criteria pollutants, with the exception of ozone, $PM_{2.5}$, and PM_{10}, for which these pollutants are designated as non-attainment for either the state or federal standards.

By definition, regional air pollution is largely a cumulative impact in that no single project is sufficient in size to, by itself, result in non-attainment of air quality standards. Instead, a project's individual emissions are considered to contribute to the existing, cumulative air quality conditions.

If a project's contribution to cumulative air quality conditions is considerable, then the project's impact on air quality would be considered significant.[50]

Table 4.E.5: Criteria Air Pollutant Thresholds identifies quantitative criteria air pollutant significance thresholds. The table is followed by a discussion of each threshold. Projects that would result in criteria pollutant emissions below these significance thresholds would not violate an air quality standard, contribute substantially to an air quality violation, or result in a cumulatively considerable net increase in criteria air pollutants within the air basin. Both of these thresholds (average daily and maximum annual) apply to operational emissions from a given project. Construction emissions are assessed solely with respect to the average daily thresholds, pursuant to the air district's guidance, because of the generally temporary nature of construction-related emissions.[51]

Table 4.E.5: Criteria Air Pollutant Thresholds

Pollutant	Average Daily Emissions (pounds per day)	Maximum Annual Emissions (tons per year)
ROG	54	10
NOx	54	10
PM_{10}	82	15
$PM_{2.5}$	54	10
Fugitive Dust	Construction dust ordinance or other best management practices to control fugitive dust emissions	

Source: BAAQMD, CEQA Air Quality Guidelines, May 2017

The thresholds of significance for criteria air pollutants are based on substantial evidence presented in Appendix D of the 2017 BAAQMD CEQA Air Quality Guidelines and 2009 Revised Draft Options and Justification Report concerning CEQA thresholds.[52]

The potential for a project to result in a cumulatively considerable net increase in criteria air pollutants that may contribute to an existing or projected air quality violation is based on the emissions limits for stationary sources set by the California and Federal Clean Air Acts. To ensure that new stationary sources do not cause or contribute to a violation of an air quality standard, the air district's Regulation 2, Rule 2 requires that any new source that emits criteria air pollutants above a specified emissions limit must offset those emissions. For ozone precursors ROG and NOx,

50 BAAQMD, CEQA Air Quality Guidelines, May 2017, http://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en, accessed May 25, 2018.

51 BAAQMD, CEQA Air Quality Guidelines, May 2017, p. 8-2, http://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en, accessed May 25, 2018.

52 BAAQMD, CEQA Air Quality Guidelines, May 2017, pp. 2-1 to 2-3 and Appendix D; BAAQMD, *Revised Draft Options and Justification Report, California Environmental Quality Act Thresholds of Significance*, October 2009, pp. 16-17.

the offset emissions level is an annual average of 10 tons per year (or 54 pounds per day).[53] These levels represent emissions below which new sources are not anticipated to contribute to an air quality violation or result in a considerable net increase in criteria air pollutants that could result in increased health effects.

The Federal New Source Review program was created under the Federal Clean Air Act to ensure that stationary sources of air pollution are constructed in a manner that is consistent with attainment of federal health-based ambient air quality standards. For PM_{10} and $PM_{2.5}$, the emissions limit under the New Source Review program is 15 tons per year (82 pounds per day) and 10 tons per year (54 pounds per day), respectively. These emissions limits represent levels below which a source alone is not expected to have a significant impact on air quality.[54]

Although the regulations specified above apply to new or modified stationary sources, land use development projects generate ROG, NOx, PM_{10}, and $PM_{2.5}$ emissions as a result of increases in vehicle trips, energy use, architectural coating, and construction activities. Therefore, the identified thresholds can be applied to the construction and operational phases of land use projects. Those projects that would result in emissions below these thresholds would not be considered to contribute to an existing or projected air quality violation or result in a considerable net increase in ozone precursors or PM.

Fugitive dust emissions are typically generated during construction phases. Studies have shown that the application of best management practices at construction sites significantly controls fugitive dust,[55] and individual measures have been shown to reduce fugitive dust by anywhere from 30 to 90 percent.[56] The air district has identified eight best management practices to control fugitive dust emissions from construction activities.[57] San Francisco's Construction Dust Control Ordinance requires a number of fugitive dust control measures to ensure that construction projects do not result in visible dust. The project would be subject to the requirements of the Construction Dust Control Ordinance, which is the basis for determining the significance of air quality impacts from fugitive dust emissions.

OTHER CRITERIA POLLUTANTS

Regional concentrations of CO and SO_2 in the Bay Area have not exceeded the state standards for over two decades. The primary source of CO emissions from development projects is vehicle

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[53] BAAQMD, *Revised Draft Options and Justification Report, California Environmental Quality Act Thresholds of Significance*, October 2009, p. 17.

[54] BAAQMD, *Revised Draft Options and Justification Report, California Environmental Quality Act Thresholds of Significance*, October 2009, p. 16.

[55] Western Regional Air Partnership, *WRAP Fugitive Dust Handbook,* September 7, 2006, wrapair.org/forums/dejf/fdh/content/FDHandbook_Rev_06.pdf, accessed October 2017.

[56] BAAQMD, *Revised Draft Options and Justification Report, California Environmental Quality Act Thresholds of Significance*, October 2009, p. 27.

[57] BAAQMD, CEQA Air Quality Guidelines, May 2011, p. 8-3.

traffic. Construction-related SO_2 emissions represent a negligible portion of the total basin-wide emissions, and construction-related CO emissions represent less than 5 percent of the Bay Area total basin-wide CO emissions. As discussed previously, the Bay Area is in attainment for both CO and SO_2. Furthermore, the air district has demonstrated, based on modeling, that to exceed the California ambient air quality standard of 9.0 ppm (8-hour average) or 20.0 ppm (1-hour average) for CO, project traffic in addition to existing traffic would need to exceed 44,000 vehicles per hour at affected intersections (or 24,000 vehicles per hour where vertical and/or horizontal mixing is limited[58]). The transportation analysis[59] indicates that the intersection in the project area with the greatest vehicle volumes would be Masonic and Euclid avenues, with average daily volumes of over 34,000 per day in year 2040 with the project variant and future traffic growth. However, this is less than 44,000 vehicles per hour. The transportation analysis also indicates that peak hour morning and afternoon traffic (existing plus project) at three nearby intersections (California Street/Laurel Street, California Street/Walnut Street, and California Street/Presidio Avenue) would range from 1,566 to 2,134 vehicles per hour during the peak morning and evening periods, which is well below 44,000 vehicles per hour.[60] Therefore, given the Bay Area's attainment status and the limited CO and SO_2 emissions that could result from the proposed project or project variant, the proposed project or project variant would not result in a cumulatively considerable net increase in CO or SO_2, and a quantitative analysis is not required.

LOCAL HEALTH RISKS AND HAZARDS

In addition to criteria air pollutants, individual projects may emit TACs. The analysis of other toxic substances that may become airborne, such as naturally occurring asbestos, is presented in the initial study (see EIR Appendix B, Topic E.15, Hazards and Hazardous Materials, pp. 232-237).

As part of the environmental review for the proposed project and project variant, a health risk assessment was conducted to provide quantitative estimates of health risks from exposures to TACs as a result of either the proposed project or project variant. The results are summarized below and are detailed in EIR Appendix F. The health risk assessment examines all sensitive receptors within 1,000 meters of the project boundary. Air pollution dispersion modeling is used to identify areas with elevated air pollutant concentrations and higher exposures.

Both the proposed project and project variant would locate new sensitive receptors (i.e., new residents and a daycare center) at the project site. With the proposed project, residents would occupy all buildings except the Walnut Building (located near the northeast corner of the project

[58] Such as a tunnel, underpass or urban canyon between buildings where free flow of air currents can be impeded.
[59] Kittelson & Associates, Average Daily Traffic Volumes – Methodology and Results Memorandum, Case No. 2015-014028ENV, November 14, 2017.
[60] Kittelson & Associates, Travel Demand Memorandum, Case No. 2015-014028ENV, March 9, 2018. (See EIR Appendix D: Transportation and Circulation Calculation Details and Supporting Information.)

site), which would include the proposed daycare center. The locations of on-site sensitive receptors would be the same for the project variant, except the Walnut Building would also have residents. For purposes of analysis of the proposed project and project variant, the entirety of the project site was conservatively assessed as a potential sensitive receptor using a 20-meter receptor grid, coincident with the Community Risk Reduction Plan (risk reduction plan) health risk assessment receptor locations. Exposure assessment guidance[61] establishes the assumption that people in residences would be exposed to air pollution 24 hours per day, 350 days per year, for 30 years as the basis for calculating cancer risk in any health risk assessments. Therefore, the assessment of air pollutant exposure to residents typically results in the greatest adverse health outcomes of all population groups.

According to OEHHA guidance,[62] the estimated excess lifetime cancer risk for a resident was adjusted using the age sensitivity factors recommended in the OEHHA Technical Support Document for Cancer Potency Factors.[63] This approach accounted for an "anticipated special sensitivity to carcinogens" of infants and children. Cancer risk estimates were weighted by a factor of 10 for exposures that occur from the third trimester of pregnancy to two years of age (labeled by OEHHA as "3rd trimester" and "0 < 2"), and by a factor of three for exposures that occur from two years through 15 years of age ("2 < 16"). No weighting factor (i.e., an age sensitivity factor of one, which is equivalent to no adjustment) was applied to ages 16 and older.

As discussed previously on pp. 4.E.17-4.E.18, neither the proposed project or project variant on-site receptors nor the nearest off-site receptors are located within an area that currently meets the APEZ criteria. For receptors not located in areas that meet the APEZ criteria, a health risk assessment was conducted to determine whether the proposed project or project variant would, in combination with other existing sources in the area, result in a given off-site or on-site receptor meeting the APEZ criteria (i.e., expanding the APEZ). If, as a result of the proposed project or project variant, a receptor point goes from below the APEZ criteria to above the APEZ criteria, then a significant project-related health risk impact could result. Specifically, this would be the case if the proposed project or project variant would contribute to $PM_{2.5}$ concentrations above 0.3 μg/m^3 or would result in an excess cancer risk greater than 10.0 per 1 million persons exposed. The 0.3 μg/m^3 $PM_{2.5}$ concentration and the excess cancer risk of 10.0 per 1 million persons exposed are

[61] Cal EPA, OEHHA, Air Toxics Hot Spots Program, Risk Assessment Guidelines, Guidance Manual for Preparation of Health Risk Assessments, February 2015, http://www.oehha.ca.gov/air/hot_spots/pdf/HRAguidefinal.pdf and https://oehha.ca.gov/media/downloads/crnr/2015guidancemanual.pdf, accessed May 25, 2018.

[62] Cal EPA, OEHHA, Air Toxics Hot Spots Program, Risk Assessment Guidelines, Guidance Manual for Preparation of Health Risk Assessments, February 2015, Chapter 8, http://www.oehha.ca.gov/air/hot_spots/pdf/HRAguidefinal.pdf and https://oehha.ca.gov/media/downloads/crnr/2015guidancemanual.pdf, accessed May 25, 2018.

[63] Cal EPA, OEHHA, Technical Support Document for Cancer Potency Factors, May 2009, https://oehha.ca.gov/air/crnr/technical-support-document-cancer-potency-factors-2009, accessed June 4, 2018.

the levels below which the air district considers new sources not to make a considerable contribution to cumulative health risks.[64]

CUMULATIVE IMPACTS

As discussed above, the contribution of a project's individual air emissions to regional air quality impacts is, by its nature, a cumulative effect. Emissions from past, present, and future projects in the vicinity also have or will contribute to adverse regional air quality impacts on a cumulative basis. No single project by itself would be sufficient in size to result in non-attainment of ambient air quality standards. Instead, a project's individual emissions contribute to existing cumulative air quality conditions.[65] As described above, the project-level thresholds for criteria air pollutants are based on levels by which new sources are not anticipated to contribute to an air quality violation or result in a considerable net increase in criteria air pollutants. Therefore, if a project's emissions are below the project-level thresholds, the project would not be considered to result in a considerable contribution to cumulative regional air quality impacts.

Similarly, the health risk assessment takes into account the cumulative contribution of localized health risks to sensitive receptors from sources included in the citywide health risk modeling plus the proposed project's sources. Other future projects, whose emissions have not been incorporated into the existing citywide health risk modeling, are also taken into consideration. However, unlike criteria air pollutants, health risks are localized impacts in that beyond 1,000 feet from an emission source, pollutant levels tend to return to background levels. Thus, cumulative health risks are typically assessed based on emissions sources within 1,000 feet of a project site. As a conservative measure, the cumulative impact analysis conducted here includes a receptor grid that extends 1,000 meters from the project site.

IMPACT EVALUATION

As discussed in the Air Quality subsection of the initial study under Impact AQ-4 (see pp. 145-146 of EIR Appendix B), construction of the proposed project or project variant and operation of the proposed land uses under either the proposed project or the project variant would not be expected to generate substantial odors during construction or operation. Therefore, the topic of odor is not included in this air quality impact evaluation.

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[64] BAAQMD, CEQA Air Quality Guidelines, May 2017, http://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en, accessed May 25, 2018.

[65] BAAQMD, CEQA Air Quality Guidelines, May 2017, p. 2-1, http://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en, accessed May 25, 2018.

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

During the proposed project's or project variant's construction period, construction activities would result in emissions of ozone precursors and PM in the form of dust (fugitive dust) and exhaust (e.g., vehicle tailpipe emissions), as discussed below in more detail. Emissions of ozone precursors and PM are primarily a result of the combustion of fuel from on-road and off-road vehicles. However, ROGs are also emitted from activities that involve paint, other types of architectural coatings, or asphalt paving.

The preliminary construction phasing program for both the proposed project and project variant is conceptual; however, it is expected to begin in 2020 and would be phased over a period of at least seven years. As discussed on p. 4.E.2, a seven-year construction period was used to provide a more conservative (worst-case) analysis than would be obtained using a longer construction period. Proposed development is expected to involve four phases, designated as Phases 1, 2, 3, and 4. The preliminary construction phasing program is described in Chapter 2, Project Description, pp. 2.91-2.96, with phasing estimates shown in Table 2.5: Preliminary Construction Phasing Program and illustrated in Figure 2.30: Preliminary Construction Phasing Diagram. The preliminary construction phasing program would also be applicable to the project variant with the exception of Phase 3. Under the project variant, Phase 3 would include the development of 153,920 gross square feet of residential uses (186 units), substituting for 49,999 gross square feet of office space and 5,524 gross square feet of retail space in the Walnut Building. Under the project variant, Phase 3 garage space would increase by 6,360 gross square feet (from 301,060 gross square feet for the proposed project to 307,420 gross square feet).

The components of each phase of the construction program would include demolition, excavation, and placement of foundations for structures; fabrication of structures; and exterior and interior work. Demolition and construction activities would require the use of heavy trucks, excavators, material loaders, cranes, and other mobile and stationary construction equipment.

Fugitive Dust

Project-related demolition, excavation, grading, and other construction activities may cause wind-blown dust that could contribute PM to the local atmosphere. Despite the established federal standards for air pollutants and ongoing implementation of state and regional air quality control plans, air pollutants continue to have impacts on human health throughout the country.

Dust can be an irritant causing watering eyes or irritation to the lungs, nose, and throat. Depending on exposure, adverse health effects can occur due to PM in general as well as specific contaminants, such as lead or asbestos that may be constituents of dust.

In response to these concerns, the San Francisco Board of Supervisors approved a series of amendments to the San Francisco Building and Health Codes, generally referred hereto as the Construction Dust Control Ordinance (Ordinance 176-08, effective July 30, 2008), with the intent of reducing the quantity of dust generated during site preparation, demolition, and overall construction work in order to protect the health of the general public and on-site workers, to minimize public nuisance complaints, and to avoid orders to stop work by the Department of Building Inspection (building department). The building department will not issue a building permit without written notification from the Director of Public Health that the applicant has an approved site-specific dust control plan. Because the project site is within 1,000 feet of sensitive receptors, the site-specific dust control plan submitted to the Director of Health is required to include a map showing sensitive receptor locations. This plan also must contain the following measures specified in section 106.3.2.6.3 of the building code: designate an individual who will be responsible for monitoring compliance with dust control requirements; water all active construction areas sufficiently to prevent dust from becoming airborne, using reclaimed water whenever possible; during excavation and dirt-moving activities, wet sweep or vacuum streets and sidewalks where work is in process; cover any inactive stockpiles; and use dust enclosures, curtains, and dust collectors as necessary.

In addition, the site-specific dust control plan may require the project sponsor to wet down areas of soil at least three times per day; provide an analysis of wind direction and install upwind and downwind particulate dust monitors; record particulate monitoring results; hire an independent, third-party to conduct inspections and keep a record of those inspections; establish shut-down conditions based on wind, soil migration, etc.; establish a hotline for surrounding community members who may be potentially affected by project-related dust; limit the area subject to construction activities at any one time; install dust curtains and windbreaks at the property lines, as necessary; limit the amount of soil in hauling trucks to the size of the truck bed and securing with a tarpaulin; enforce a 15-mile-per-hour speed limit for vehicles entering and exiting construction areas; sweep affected streets with water sweepers at the end of the day; install and use wheel washers to clean truck tires; terminate construction activities when winds exceed 25 miles per hour; and sweep off adjacent streets to reduce particulate emissions. Inactive stockpiles (where no disturbance occurs for more than 7 days) greater than 10 cubic yards or 500 square feet of excavated material, backfill material, import material, gravel, sand, road base, and soil must be covered with a 10 mil (0.01 inch) polyethylene plastic (or equivalent) tarp, braced down, or other equivalent soil stabilization techniques should be used. Reclaimed water must be used for dust suppression watering, when required by article 21, section 1100 et seq. of the San Francisco Public Works Code. Contractors must provide as much water as necessary to control dust (without creating run-off in any area of land clearing, and/or earth movement). The San Francisco Public Utilities Commission operates a recycled water fill station at the Southeast Water Pollution Control Plant, which provides recycled water at no charge.[66]

Implementation of dust control measures in compliance with the regulations and procedures set forth by the San Francisco Construction Dust Control Ordinance would ensure that potential dust-related construction air quality impacts of the proposed project or project variant would be less than significant.

Regarding asbestos, as discussed in the Hazards and Hazardous Materials subsection of the initial study under Impact HZ-2 (see pp. 235-236 of EIR Appendix B) and further discussed under Section 4.F, Initial Study Supplement, pp. 4.F.2-4.F.13, naturally occurring asbestos is known to be present in the bedrock beneath the site. As required, excavation and site grading would be conducted in accordance with the site mitigation plan required pursuant to the Maher Ordinance (article 22A of the health code); the Dust Control Plan, required pursuant to the Construction Dust Control Ordinance (article 22B of the health code); and the Asbestos Dust Mitigation Plan, required pursuant to the state Asbestos Airborne Toxic Control Measure for Construction, Grading, Quarrying, and Surface Mining Operations.[67] Thus, based on the required adherence to local, regional, and state construction dust control best management practices, particularly those that pertain to naturally occurring asbestos, any effects associated with the naturally occurring asbestos would be less than significant.

Criteria Air Pollutants

METHODOLOGY – CONSTRUCTION EMISSIONS

Construction emissions would be generated by many different construction sources, including off-road construction equipment such as excavators, loaders, backhoes, rollers, and cranes; and on-road trucks. The predominant source of emissions of NOx, PM_{10}, and $PM_{2.5}$ would be off-road equipment. The predominant source of ROG emissions would be off-gassing emissions from the application of architectural coating.

Construction-related emissions of criteria air pollutants were calculated using methods consistent with the latest CalEEMod emissions calculator model (version 2016.3.2) developed for the

[66] City Ordinance 175-91 requires the use of nonpotable water for soil compaction and dust control undertaken in conjunction with any construction or demolition project occurring within the boundaries of San Francisco, unless permission is obtained from the San Francisco Public Utilities Commission.

[67] California Code of Regulations Title 17, Section 93105, https://www.arb.ca.gov/toxics/atcm/asb2atcm.htm, accessed May 28, 2018. Pursuant to the authority in California Health and Safety Code, Section 39666, the Bay Area Air Quality Management District enforces these standards.

California Air Pollution Control Officers Association.[68] Emissions were calculated outside of CalEEMod using equivalent methods that account for overlapping construction components of the proposed project's or project variant's preliminary construction phasing program. Because the proposed project or project variant would be subject to the requirements of the San Francisco Construction Dust Control Ordinance, which is the basis for determining the significance of air quality impacts from fugitive dust emissions, only PM_{10} and $PM_{2.5}$ exhaust emissions were quantified in this analysis, consistent with recommendations in BAAQMD's CEQA Air Quality Guidelines. The analysis used the anticipated project-specific off-road equipment types and hours provided by the project sponsor for each component of each phase of the construction program (included in Table AQ-2 in EIR Appendix F).[69] Figure 4.E.4: Modeled Construction Sources for Preliminary Construction Phasing Program shows the location of construction sources corresponding to each phase of the construction phasing program. The air quality analysis used default horsepower and load factors represented in the CalEEMod model as assumptions for each phase of the construction program.

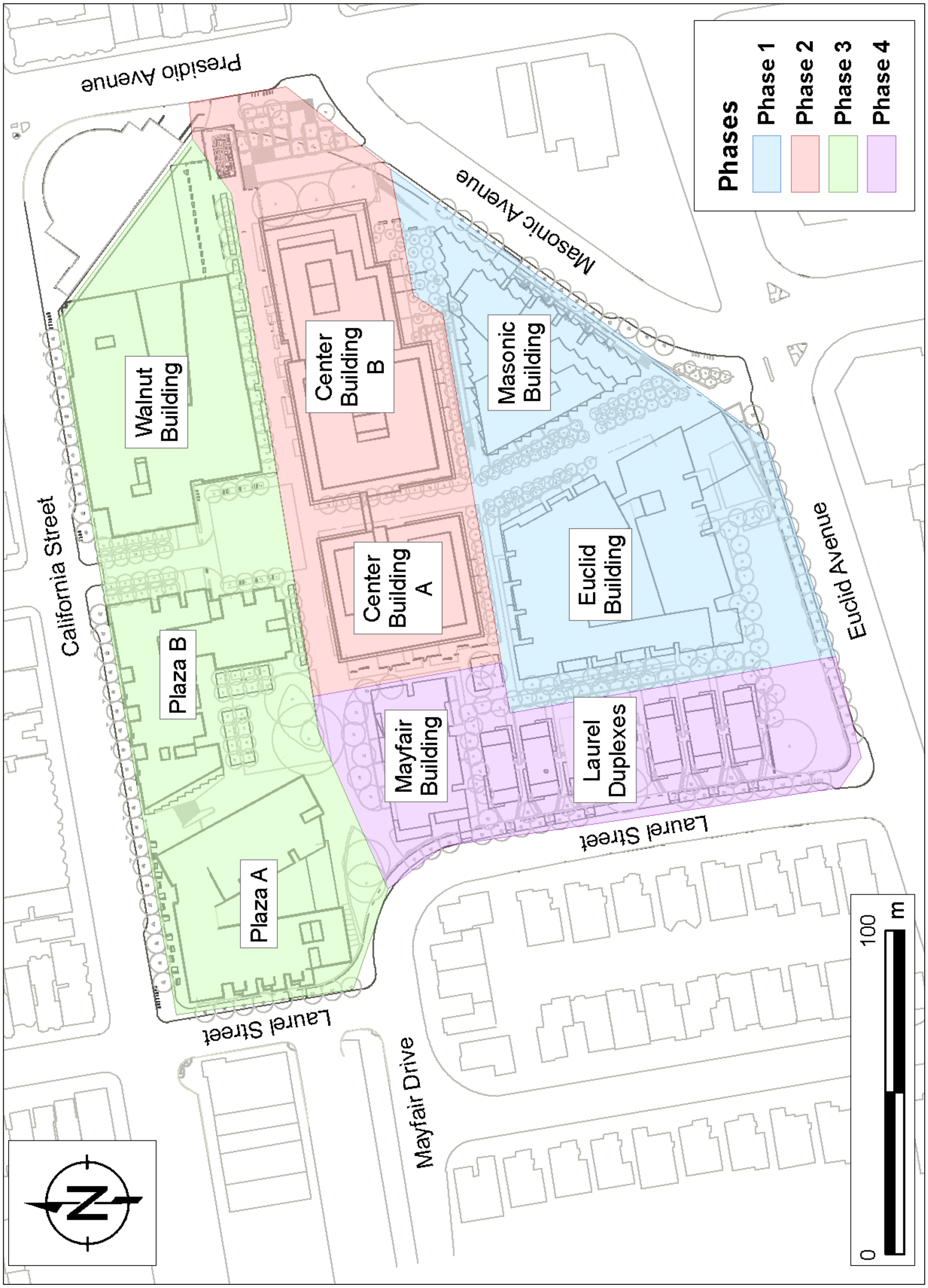
On-road haul truck traffic would primarily consist of material delivery to the site and removal of demolition and excavation materials. Approximately 288,000 cubic yards of soil and debris would be hauled away from the entire site over all four phases of the construction program, resulting in a maximum of 80 round trips per day (160 one-way trips), including both excavated soil off-haul and demolition spoils. These soil and demolition debris haul trips were allocated to the demolition and excavation components of each phase of the construction program. Additional trucks would be required for concrete delivery, plus two material/vendor trips per day for the duration of each phase of the construction program were assumed.

A variety of truck routes were evaluated as part of this analysis, including California Street, Pine Street, Bush Street, and Geary Boulevard. These routes were developed based on the best information available at the time the analysis was performed. Actual routes may vary, but these differences are not expected to have a material difference in air quality impacts because the total criteria air pollutant emissions would be virtually equivalent regardless of which route is selected.

Construction of the proposed project or project variant would occur in four phases over a period of seven years or longer, and buildings constructed in a given phase of the construction program would be occupied after completion of that phase. During all or a portion of the construction of Phase 2, Phase 1 is assumed to be operational. Therefore, the analysis adds together the construction

[68] On August 5, 2013, the Bay Area Air Quality Management District notified the public via its website that all future CEQA analysis of criteria pollutant emissions should be conducted using CalEEMod. However, this notification is no longer posted.

[69] Bell, Joe, Webcor Builders, e-mail correspondence with Peter Mye at SWCA regarding construction data, September 14, 2017.



SOURCE: Laurel Heights Partners, LLC and Ramboll

3333 CALIFORNIA STREET MIXED-USE PROJECT

2015-014028ENV

FIGURE 4.E.4: MODELED CONSTRUCTION SOURCES FOR PRELIMINARY CONSTRUCTION PHASING PROGRAM

emissions of Phase 2 and the operational emissions of Phase 1. The same is true for all of the subsequent phases of the construction program; when a phase of the construction program is being carried out, the previous phases are assumed to be operational and the emissions from the construction components of that phase (e.g., demolition, excavation, foundation installation, etc.) and the concurrent operational emissions from previously completed and occupied phases of the construction program are added together. The phases of the construction program may not be undertaken exactly as laid out in the preliminary construction phasing program diagram, so these emissions estimates are designed to provide a representative approximation. The analysis results are considered conservative (i.e., high end) estimates because they assume construction would occur during the first seven years, but emissions are expected to decrease over time as the off-road and on-road fleet incorporates newer, lower-emitting engines. (See Table AQ-4 in EIR Appendix F, which details methods for emissions calculations.)

Total construction emissions by phase were calculated for the proposed project and project variant using methods consistent with the latest version of CalEEMod, and total emissions were divided by the number of construction days by phase to derive average daily emissions for comparison against applicable significance thresholds.

As noted, the order of the construction phases is preliminary and may be altered; however, minor changes to construction-related air pollutant emissions for any particular phase, locational shifts for the maximally exposed onsite sensitive receptors, and potential variations in the duration of construction overlaps would not result in substantial changes to results reported for the preliminary phasing program.

METHODOLOGY – OPERATIONAL EMISSIONS

Since project operations would be phased in at the completion of each construction phase, operational emissions are considered in addition to construction emissions in the evaluation of Impact AQ-1. A discussion of operational impacts at project build-out is included under Impact AQ-2 on pp. 4.E.49-4.E.52.

The proposed project or project variant would generate operational emissions from a variety of sources, including stationary sources (diesel emergency generators); area sources (natural gas combustion in boilers/heaters and stoves, consumer products, architectural coatings, and landscape equipment); and from mobile sources (daily automobile and truck trips). Potential emissions from one emergency diesel generator (stationary source) were estimated based on CARB/EPA Tier 2 emission standards as described above under Regulation 2, Rule 5, pp. 4.E.23-4.E.24. The project sponsor indicated that the proposed diesel generator would be 800-kilowatt (or 1,073-horsepower) and would meet the Federal Tier 2 diesel engine standards for PM for diesel engines. It was assumed that the generator would be tested for 50 hours per year (consistent with the air district's permitting limits). The existing project site also includes one 380-horsepower diesel emergency generator that would be removed during Phase 2 of the construction program for the proposed project or project variant. This generator was assumed to operate for 20 hours per year (consistent with the generator's permit limit for reliability-related testing). Figure 4.E.5: Emergency Diesel Generator Locations shows the locations of both the existing and proposed generators.[70] Therefore, emissions from the existing generator were subtracted from emissions from the proposed generator to obtain net emissions from the proposed project or project variant. (See Table AQ-9 in EIR Appendix F for calculation of emissions from both generators.)

Area-source and energy emissions were calculated using the CalEEMod model based on the type and size of land uses associated with the proposed project or project variant. Area sources include natural gas combustion in stoves, hearths, consumer products, area architectural coatings, and landscaping equipment. San Francisco County-specific consumer product emission rate data were used in the CalEEMod model to estimate daily VOC emissions, as shown in Table 4.E.8: Emissions from the Proposed Project During Operations at Full Build-Out and Table 4.E.9: Emissions from the Project Variant During Operations at Full Build-Out, on pp. 4.E.51 and 4.E.53.

Mobile-source emissions would result from vehicle trips (auto and truck) associated with the proposed project or project variant and were also calculated using the CalEEMod model based on the number of vehicle trips estimated to be generated by the proposed project and project variant.[71] Operational emissions calculations for vehicle trips were based on net new trips, i.e., existing vehicle trips were subtracted from the total estimated vehicle trips associated with the proposed project or project variant. Operational emissions calculations for entrained road dust are based on San Francisco-specific silt loadings.[72] Figure 4.E.6: Modeled Operational Traffic Routes on p. 4.E.46 shows the routes used in modeling operational mobile-source emissions.

Project operational emissions of criteria pollutants from vehicle trips, stationary (back-up generators), energy use, and area sources are summed to determine total operational emissions. Ultimately, the vast majority of operational NOx (89 percent) and PM (99 percent) emissions are from mobile emissions sources. The largest fraction of project-related ROG emissions are generated from area sources, particularly the use of consumer products by building occupants (60 percent). A detailed quantification of operational-related criteria air pollutant emissions was conducted for both the proposed project and project variant at project build-out, as well as at the completion of each phase of the construction program. The criteria air pollutant significance thresholds are based on levels by which a project would contribute considerably to significant air

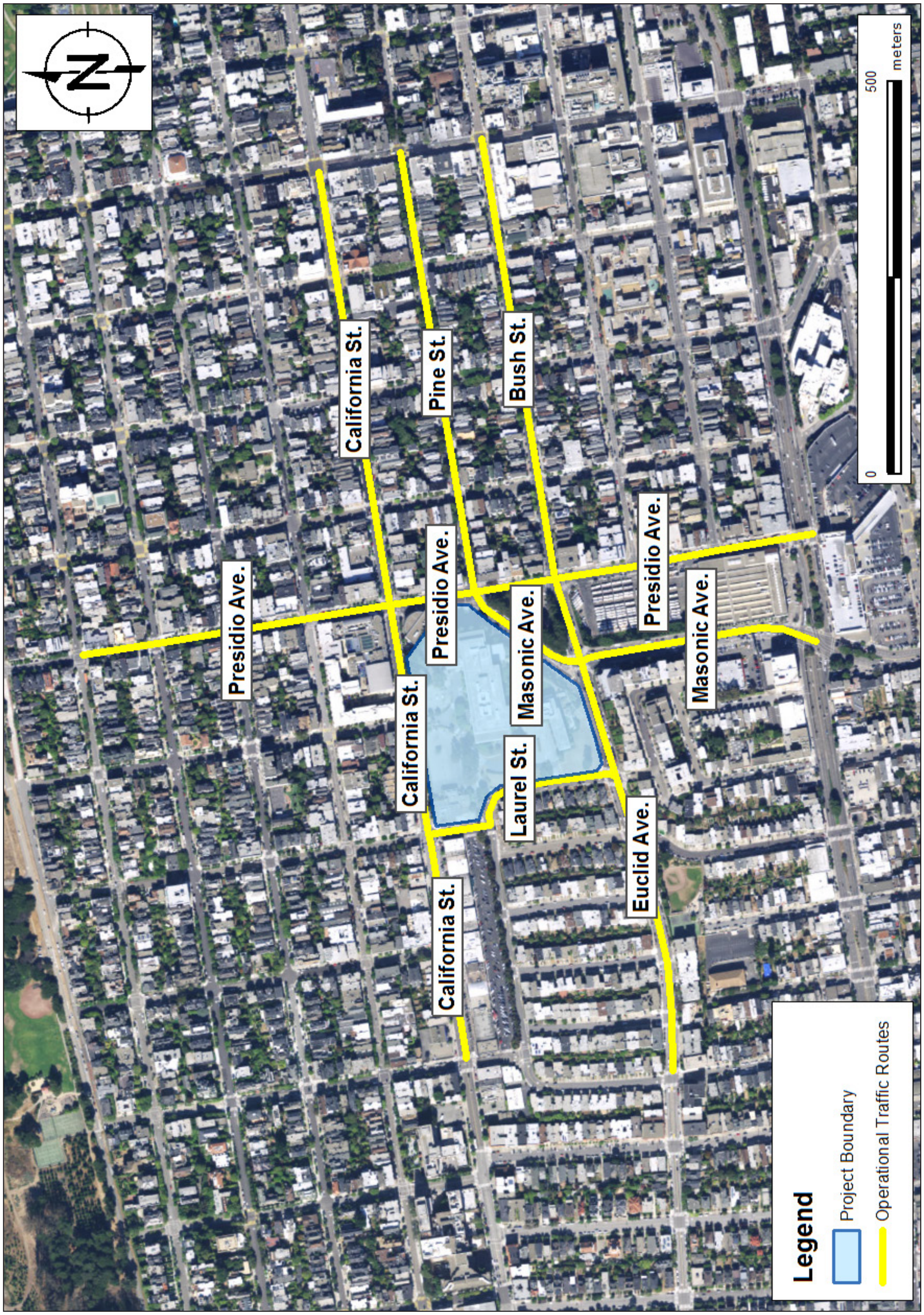
[70] As described above under Proposed Project, the current generator is located in Basement Level B1 and vents to the ground level near the SF Fire Credit Union. The proposed generator would be located in the garage below the Masonic Building and would vent to the roof of the Masonic Building.
[71] Kittelson & Associates, Travel Demand Memorandum, Case No. 2015-014028ENV, March 9, 2018.
[72] CARB, Miscellaneous Process Methodology 7.9, Entrained Road Travel, Paved Road Dust, revised April 2014, https://www.arb.ca.gov/ei/areasrc/fullpdf/full7-9_2016.pdf, accessed May 25, 2018.

Source: Ramboll

3333 CALIFORNIA STREET MIXED-USE PROJECT

2015-014028ENV

FIGURE 4.E.5: EMERGENCY DIESEL GENERATOR LOCATIONS



SOURCE: Ramboll

3333 CALIFORNIA STREET MIXED-USE PROJECT

2015-014028ENV

FIGURE 4.E.6: MODELED OPERATIONAL TRAFFIC ROUTES

quality impacts (the project being the sum of the emissions at any one time, whether the emissions are from operation or construction is inconsequential to the effect on the air basin). Consequently, operational emissions are added to construction emissions when they would occur simultaneously, to disclose and analyze the air quality impacts of the whole project.

Proposed Project

Table 4.E.6: Emissions from the Proposed Project During Construction and Operations, presents construction-period emissions that would result from the proposed project, which, due to the concurrent construction and operation of the proposed project, are calculated in terms of average daily emissions for the construction period including concurrent operational emissions. The maximum average daily emissions during construction of the proposed project is compared to significance thresholds to establish a significance determination.

Construction emissions include emissions from both off-road construction equipment and on-road construction vehicles, including haul trucks, concrete deliveries, and vendor trips. Construction of any single phase of the proposed project's construction phasing program would result in emissions of ROG, NOx, PM_{10}, and $PM_{2.5}$ that would be below the thresholds of significance when considered alone. Additionally, future phases of the preliminary construction program (Phases 2, 3, and 4) would overlap, and also would occur when operational emissions would be generated by the earlier phases. Emissions from overlapping phases of the preliminary construction program were calculated by summing the average daily emissions from each active phase during that time span (see Figure 4.E.3, p. 4.E.31, for a representation of overlapping phases). As shown in Table 4.E.6, construction-related emissions during each phase of the preliminary construction program, including the overlap of phases, would be less than significant. If the maximum daily construction and overlapping operational emissions for ROG, NOx, PM_{10}, and $PM_{2.5}$ were converted into annual emissions and reported in tons per year, the results would still be below the annual average criteria air pollutant significance thresholds shown in Table 4.E.5, p. 4.E.33. Additionally, since operations would begin at each area of the site as construction is completed, operational emissions were added to the construction emissions; the combined emissions were also found to be below significance thresholds.

Specifically, Table 4.E.6 indicates that the maximum average daily emissions (in pounds per day), after accounting for overlapping phases of the construction program plus operation, would be 38 for ROG, 39 for NOx, 21 for PM_{10}, and 6.4 for $PM_{2.5}$, each of which is below the respective thresholds of 54 for ROG, NOx, and $PM_{2.5}$, and 82 for PM_{10}.

Therefore, criteria pollutant emissions generated from the proposed project during simultaneous construction and operation would be a less-than-significant air quality impact.

Table 4.E.6: Emissions from the Proposed Project During Construction and Operations

Phase	Average Daily Emissions (lb/day) NOTES A &B			
	ROG	**NOx**	**PM_{10} NOTE C**	**$PM_{2.5}$ NOTE C**
Phase 1 Construction	7	17	0.49	0.45
Phase 1/2 Construction Overlap	16	23	0.71	0.66
Phase 2 Construction + Phase 1 Operation	33	28	21	6.1
Phase 2/3 Construction Overlap + Phase 1 Operation	38	39	21	6.4
Phase 3 Construction + Phase 1 - 2 Operation	29	34	21	6.2
Phase 3/4 Construction Overlap + Phase 1 - 2 Operation	33	37	21	6.3
Phase 4 Construction + Phase 1 - 3 Operation	28	27	21	6.0
Significance Threshold	*54*	*54*	*82*	*54*
Above Threshold?	No	No	No	No

Notes:

[A] Average daily emissions are calculated from values listed in EIR Appendix F Tables AQ-7 and AQ-10b by summing all emissions in the given phase of the construction program and dividing by the total number of days in that phase of the construction program.

[B] As a conservative assumption, area source emissions were calculated for full project build-out for all phases of the construction program. Similarly, since only maximum trips for project build-out were provided by the Transportation Engineer, these emissions conservatively include all traffic from full build-out (i.e., full project traffic is assumed starting at Phase 1 Operation though in reality it would not reach this level until Phase 4 Operation). On-road emission factors assuming an average fleet in 2022 were used as a conservative assumption, since fleets generally become cleaner over time. Operational generator emissions are added in after Phase 2 is constructed, when the new generator is installed.

[C] PM emissions shown include exhaust emissions only. Fugitive dust emissions are addressed by the San Francisco Construction Dust Control Ordinance and were not quantified.

Source: Ramboll, 2017, Tables AQ-7 and AQ-10b in EIR Appendix F

Project Variant

Table 4.E.7: Emissions from the Project Variant During Construction and Operations presents construction-period emissions for the project variant. Due to the similar nature of the proposed project and project variant, including similar overall square footages, construction equipment and schedules, construction emissions are expected to be the same. Operational area source emissions are slightly different for the project variant due to differences in land use, and thus the average daily emissions for construction and concurrent operations are presented for the project variant in Table 4.E.7.

As noted above, construction-period emissions are calculated in terms of average daily emissions due to the concurrent construction and operation of the project variant. The maximum average daily emissions is compared to significance thresholds to establish a significance determination for the project variant. Specifically, Table 4.E.7 indicates that the maximum average daily emissions (in

Table 4.E.7: Emissions from the Project Variant During Construction and Operations

Phase	Average Daily Emissions (lb/day) NOTES A & B			
	ROG	**NOx**	**PM_{10}** NOTE C	**$PM_{2.5}$** NOTE C
Phase 1 Construction	7	17	0.49	0.45
Phase 1/2 Construction Overlap	16	23	0.71	0.66
Phase 2 Construction + Phase 1 Operation	36	29	21	6.3
Phase 2/3 Construction Overlap + Phase 1 Operation	41	39	22	6.6
Phase 3 Construction + Phase 1 - 2 Operation	31	34	22	6.4
Phase 3/4 Construction Overlap + Phase 1 - 2 Operation	35	38	22	6.5
Phase 4 Construction + Phase 1 - 3 Operation	30	27	21	6.2
Significance Threshold	*54*	*54*	*82*	*54*
Above Threshold?	No	No	No	No

***Notes**:*
[A] Average daily emissions are calculated from values listed in EIR Appendix F Tables AQ-7 and AQ-11b by summing all emissions in the given phase of the construction program and dividing by the total number of days in that phase.
[B] As a conservative assumption, area source emissions were calculated for full project build-out for all phases of the construction program. Similarly, since only maximum trips for project build-out were provided by the Transportation Engineer, these emissions conservatively include all traffic from full build-out (i.e., full project traffic is assumed starting at Phase 1 Operation though in reality it would not reach this level until Phase 4 Operation). On-road emission factors assuming an average fleet in 2022 were used as a conservative assumption, since fleets generally become cleaner over time. Operational generator emissions are added in after Phase 2 is constructed, when the new generator is installed.
[C] PM emissions shown include exhaust emissions only. Fugitive dust emissions are addressed by the San Francisco Construction Dust Control Ordinance and were not quantified.

Source: Ramboll, 2017; Tables AQ-7 and AQ-11b in EIR Appendix F

pounds per day), after accounting for overlapping construction phases plus operation, would be 41 for ROG, 39 for NOx, 22 for PM_{10}, and 6.6 for $PM_{2.5}$, each of which is below the respective thresholds of 54 for ROG, NOx, and $PM_{2.5}$, and 82 for PM_{10}. Because combined emissions for the project variant would be nearly the same as for the proposed project shown above, the significance determination is also the same – less than significant. Additionally, if the maximum daily construction emissions were converted into annual emissions in units of tons per year, results would still be below significance thresholds.

Impact AQ-2: At project build-out, the operation of the proposed project or project variant would not result in emissions of criteria air pollutants at levels that would violate an air quality standard, contribute to an existing or projected air quality violation, or result in a cumulatively considerable net increase in criteria air pollutants. *(Less than Significant)*

Operation of the proposed project or project variant would have the potential to create air quality impacts, which would be associated primarily with mobile, area, stationary, and energy sources. Motor vehicle traffic would include daily resident-access, visitor, delivery truck, and employee trips. Area sources include landscaping equipment, architectural coatings and the associated off-gassing during reapplication, and consumer products (e.g., solvents, cleaning supplies, cosmetics, toiletries). Stationary sources include a proposed emergency diesel generator. Energy sources include natural gas combustion for space and water heating. Each of these sources was taken into account in calculating the proposed project's and project variant's long-term operational emissions.

Operational emissions at project build-out were quantified consistent with the methodology identified above for Impact AQ-1 for build-out year 2027. The operational emissions at project build-out for the proposed project and project variant are discussed below.

Proposed Project

The daily and annual increase in emissions associated with operation of the proposed project at project build-out is shown in Table 4.E.8 for ROG (precursor of ozone), NO_X (precursor of ozone), PM_{10}, and $PM_{2.5}$ with results showing the contribution by source. As shown in Table 4.E.8, the average daily emissions at full buildout (in pounds per day) would be 24 for ROG, 24 for NOx, 21 for PM_{10}, and 5.9 for $PM_{2.5}$, which are below the respective BAAQMD CEQA significance thresholds of 54 for ROG, NOx, and $PM_{2.5}$, and 82 for PM_{10}. The maximum annual operational emissions at full buildout (in tons per year) would be 4.4 for ROG, 4.3 for NOx, 3.8 for PM_{10}, and 1.1 for $PM_{2.5}$, which are also below the respective BAAQMD CEQA significance thresholds of 10 for ROG, NOx, and $PM_{2.5}$, and 15 for PM_{10}. ROG emissions would be generated primarily from area source emissions (77 percent) and mobile sources (21 percent). The area source emission component is primarily attributable to consumer product use by building occupants (60 percent). NOx and PM emissions would be generated primarily from mobile sources. Mobile source emissions were calculated using vehicle trip estimates for the uses proposed (see EIR Appendices D and F).[73,74] Internal trips and external trips by transit or walking were subtracted from the total operational trip count.

Therefore, because the proposed project's emissions would be below the operational significance criteria, the proposed project would have a less-than-significant impact on regional emissions of ozone precursors (ROG and NOx), PM_{10}, and $PM_{2.5}$.

73 Kittelson & Associates, Travel Demand Memorandum, Case No. 2015-014028ENV, March 9, 2018, Table 5. (See EIR Appendix D: Transportation and Circulation Calculation Details and Supporting Information.)

74 Ramboll, Addressing Traffic Data Discrepancies in the Draft EIR Air Quality Analysis, August 31, 2018 (See EIR Appendix F: Air Quality Calculation Details and Supporting Information.)

Table 4.E.8: Emissions from the Proposed Project During Operations at Full Build-Out

Emissions Source	Average Daily Emissions (lb/day) NOTES A, B & C			
	ROG	NOx	PM_{10}	$PM_{2.5}$ NOTE D
Net Generator Emissions	0.15	0.72	0.0028	0.0028
Architectural Coating	3.6	0.0	0.0	0.0
Consumer Products NOTE E	14	0.0	0.0	0.0
Hearths	0.0	0.11	0.0	0.0
Landscaping	0.68	0.26	0.13	0.13
Building Energy Use	0.19	1.6	0.13	0.13
On-Road Fugitive Dust	0.0	0.0	20	5.5
On-Road Exhaust	5.2	21	0.21	0.19
Total Project Emissions (lb/day)	*24*	*24*	*21*	*5.9*
Significance Threshold (lb/day)	***54***	***54***	***82***	***54***
Above Threshold?	No	No	No	No
Total Project Emissions (tons/year)	*4.4*	*4.3*	*3.8*	*1.1*
Significance Threshold (tons/year)	***10***	***10***	***15***	***10***
Above Threshold?	No	No	No	No

Notes:

[A] Emissions estimated using CalEEMod version 2016.3.2.

[B] Operational criteria air pollutant emissions were estimated for the full project build-out in 2027. On-road emission factors assuming an average fleet in 2022 were used as a conservative assumption, since fleets generally become cleaner over time. Operations during all other years (while construction would still be taking place) would have less emissions than the full build-out year presented above, since only a fraction of the proposed project or project variant would be operational prior to full build-out.

[C] Average daily emissions were calculated assuming 365 days of operation per year.

[D] $PM_{2.5}$ are assumed to be equivalent to PM_{10} emissions for the emergency generators.

[E] San Francisco's ROG emissions from consumer products was 5.30 tons and San Francisco's assumed square footage was 703,541,231 square feet (2011 Land Use data). Therefore, the emission factor would be (5.30 tons/day * 2000 lbs/ton)/703,541,231 = 1.51e-5 lbs/(sq. ft-day). This was used as the emission factor for ROG for the proposed project and project variant.

Source: Ramboll, 2017; Tables AQ-10a and AQ-10b in EIR Appendix F

Project Variant

The only differences in operational emissions between the proposed project and project variant would be emissions from area sources, including natural gas combustion in boilers/heaters and stoves, consumer products, architectural coatings, and landscape equipment. Operational traffic volumes for the project variant would be essentially the same as those for the proposed project (see EIR Appendix D).[75] The number of net new external vehicle trips would also essentially be the same for both weekday a.m. and p.m. peak hours (see EIR Appendix D).[76] Additionally, both the

[75] Kittelson & Associates, Travel Demand Memorandum, Case No. 2015-014028ENV, March 9, 2018, Table 11. (See EIR Appendix D: Transportation and Circulation Calculation Details and Supporting Information.)

[76] Kittelson & Associates, Travel Demand Memorandum, Case No. 2015-014028ENV, March 9, 2018, Table 12. (See EIR Appendix D: Transportation and Circulation Calculation Details and Supporting Information.)

proposed project and project variant would include removal of the existing generator and installation of a new, larger emergency generator (the new generator would be the same size and type for both the proposed project and project variant).

The daily and annual increase in criteria air pollutant emissions associated with operation of the project variant is shown in Table 4.E.9 for ROG, NO_X, PM_{10}, and $PM_{2.5}$ with results showing the contribution by source. As shown in Table 4.E.9, the average daily emissions at full buildout (in pounds per day) would be 26 for ROG, 24 for NOx, 21 for PM_{10}, and 6.1 for $PM_{2.5}$, which are below the respective BAAQMD CEQA significance thresholds of 54 for ROG, NOx, and $PM_{2.5}$, and 82 for PM_{10}. The maximum annual operational emissions at full buildout (in tons per year) would be 4.8 for ROG, 4.4 for NOx, 3.9 for PM_{10}, and 1.1 for $PM_{2.5}$, which would also be below the respective BAAQMD CEQA significance thresholds of 10 for ROG, NOx, and $PM_{2.5}$, and 15 for PM_{10}. Therefore, the project variant would also have a less-than-significant impact on regional emissions related to ozone precursors, PM_{10}, and $PM_{2.5}$.

Impact AQ-3: Construction and operation of the proposed project or project variant would not generate toxic air contaminants, including DPM, at levels which would expose sensitive receptors to substantial pollutant concentrations. *(Less than Significant)*

Construction activities, such as demolition, excavation, grading, foundation construction, building construction, and interior and exterior work, would affect localized air quality during the construction phases of the proposed project or project variant. Short-term emissions from construction equipment during these site preparation activities would include directly emitted PM ($PM_{2.5}$ and PM_{10}) and TACs such as DPM. Additionally, the long-term emissions from the proposed project's or project variant's mobile and stationary sources, as described under Impact AQ-1 and Impact AQ-2 (see pp. 4.E.38-4.E.53), would include PM ($PM_{2.5}$) and TACs such as DPM and some compounds or variations of ROGs. A health risk assessment was conducted for the proposed project and project variant to evaluate the potential health risks to nearby residents resulting from project implementation.

Because neither the proposed on-site receptors nor the nearest off-site receptors are located within an area that currently meets the APEZ criteria (100 in 1 million excess cancer risk or a $PM_{2.5}$ concentration of 10 $\mu g/m^3$), the health risk assessment was conducted to determine whether the proposed project or project variant would, in combination with other existing sources in the area, result in a given off-site or on-site receptor meeting the APEZ criteria.

Table 4.E.9: Emissions from the Project Variant During Operations at Full Build-Out

Emissions Source	Average Daily Emissions (lb/day) NOTES A, B & C			
	ROG	**NOx**	**PM_{10}**	**$PM_{2.5}$ NOTE D**
Net Generator Emissions	0.15	0.72	0.0028	0.0028
Architectural Coating	4.0	0.0	0.0	0.0
Consumer Products NOTE E	16	0.0	0.0	0.0
Hearths	0.016	0.14	0.011	0.011
Landscaping	0.91	0.35	0.17	0.17
Building Energy Use	0.21	1.8	0.14	0.14
On-Road Fugitive Dust	0.0	0.0	21	5.6
On-Road Exhaust	5.2	21	0.21	0.20
Total Project Emissions (lb/day)	*26*	*24*	*21*	*6.1*
Significance Threshold (lb/day)	***54***	***54***	***82***	***54***
Above Threshold?	No	No	No	No
Total Project Emissions (tons/year)	*4.8*	*4.4*	*3.9*	*1.1*
Significance Threshold (tons/year)	***10***	***10***	***15***	***10***
Above Threshold?	No	No	No	No

Notes:

[A] Emissions estimated using CalEEMod version 2016.3.2.

[B] Operational criteria air pollutant emissions were estimated for the full project build-out in 2027. On-road emission factors assuming an average fleet in 2022 were used as a conservative assumption, since fleets generally become cleaner over time. Operations during all other years (while construction would still be taking place) would have less emissions than the full build-out year presented above, since only a fraction of the proposed project or project variant would be operational prior to full build-out.

[C] Average daily emissions were calculated assuming 365 days of operation per year.

[D] $PM_{2.5}$ are assumed to be equivalent to PM_{10} emissions for the emergency generators.

[E] San Francisco's ROG emissions from consumer products was 5.30 tons and San Francisco's assumed square footage was 703,541,231 square feet (2011 Land Use data). Therefore, the emission factor would be (5.30 tons/day * 2000 lbs/ton)/703,541,231 = 1.51e-5 lbs/(sq. ft-day). This was used as the emission factor for ROG for the proposed project and project variant.

Source: Ramboll, 2017; Tables AQ-11a and AQ-11b in EIR Appendix F

Methodology

In general, a health risk assessment is used to determine if a particular chemical poses a significant risk to human health and, if so, under what circumstances. For the proposed project and project variant, a health risk assessment was conducted in order to identify maximum on-site and off-site health risks due to inhalation of $PM_{2.5}$ and TACs. The health risk assessment prepared for the proposed project and project variant focuses on $PM_{2.5}$ and TACs because these, more so than other types of air pollutants, pose significant health impacts at the local level.[77] A detailed discussion of the methods used for this analysis is provided in the Air Quality Scope of Work included in EIR Appendix F. Changes to the methodology made since the Scope of Work was approved include: (1) the hours assumed for the existing emergency generator due to additional information on their

[77] BAAQMD, *CEQA Air Quality Guidelines*, May 2017, p. 5-1.

permitted hours of operation (i.e., 20 hours per year vs. the 50 hours per year limit in the CARB Air Toxic Control Measure for stationary diesel engines); (2) the methodology for operational traffic (explicit evaluation rather than screening approach); and (3) the methodology for the review of the 2040 condition (a more explicit quantitative evaluation rather than qualitative discussion). Updated methodologies for these items are discussed in this report which supersedes the methodologies described in the Scope of Work dated September 1, 2017.

Using an air dispersion model, concentrations of $PM_{2.5}$ and TACs were estimated at nearby sensitive receptors, including residences, schools/daycare facilities, senior care facilities, and in-patient medical centers. These concentrations were then used in combination with toxicity and exposure information to estimate inhalation health risks following the most recent BAAQMD Recommended Methods for Screening and Modeling Local Risks and Hazards.[78]

The health risk analysis estimated DPM, speciated[79] total organic gas (TOG), and $PM_{2.5}$ concentrations based on data generated using EMFAC2014 (consistent with the method used by the CalEEMod model[80]) for construction and operational project vehicle traffic. Operational emissions from the emergency standby generator were based on calculations using emission rates published by the air resources board and the U.S. EPA.[81] DPM, TOG, and $PM_{2.5}$ emissions rates were used as inputs into AERMOD to predict worst case DPM, TOG, and $PM_{2.5}$ concentrations, respectively. AERMOD is also the model that was used by BAAQMD and the City in the citywide health risk modeling discussed above under "Environmental Setting" (see pp. 4.E.12-4.E.13). DPM and speciated TOG concentrations were then used to determine excess lifetime cancer risk based on the health risk assessment methodology published by the OEHHA in 2015. Construction activities were modeled as area sources, haul trips and operational trips as adjacent volume sources, and operational generators as point sources.[82]

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[78] BAAQMD, *Recommended Methods for Screening and Modeling Local Risks and Hazards,* May 2012, http://www.baaqmd.gov/~/media/Files/Planning%20and%20Research/CEQA/BAAQMD%20Modeling%20Approach.ashx, accessed May 25, 2018.

[79] Only certain compounds, or species, of total organic gases are also TACs.

[80] Since technical analyses for the EIR were completed, the ARB released a newer version of the EMFAC model (EMFAC2017). EMFAC2014 and EMFAC2017 differences were reviewed as they apply to analyses considered herein and documented in a separate memo entitled "Use of EMFAC Model Version in Draft EIR Air Quality Analysis" dated September 4, 2018, which is included in EIR Appendix F. As discussed in that memo, all impacts would be the same or lower than described here if the analysis were to use EMFAC2017 instead of EMFAC2014. All results using EMFAC2017 were the same as those generated with EMFAC2014 except that the EMFAC2017 resulted in a reduction in the NO_X emissions.

[81] CARB, ARB and U.S. EPA Off-Road Compression-Ignition (Diesel) Engine Standards (NMHC+NOx/CO/PM in g/bhp-hr), http://www.arb.ca.gov/msprog/ordiesel/documents/Off-Road_Diesel_Stds.xls, accessed May 25, 2018.

[82] In dispersion modeling, a point source is a source emanated from a discrete point on the modeling grid. An area source is a two-dimensional emissions source that is represented by polygon vertices. A volume source is a three-dimensional emissions source that is represented by a location, release height, and initial lateral and vertical plume sizes.

The DPM and $PM_{2.5}$ concentrations for each phase of construction, as well as for overlapping phases of construction due to construction activities and haul trips, were modeled separately by year of construction, to account for emissions specific to construction activities occurring in specific time periods.[83] Operational on-road traffic and emergency generator emissions were also modeled to determine pollutant concentrations at on- and off-site receptors. The excess cancer risk and $PM_{2.5}$ concentrations from all sources (ambient [for $PM_{2.5}$ only] plus project construction and operation) as well as the excess cancer risk from the sum of all existing emissions sources for each receptor point was then determined.

Near-field air dispersion modeling of DPM from project sources was conducted using the U.S. EPA's AERMOD model (version 16216).[84] This model requires inputs such as source parameters, meteorological parameters, topography information, and receptor parameters. The exposure parameters were obtained using risk assessment guidelines from the California Environmental Protection Agency[85] and the air district.[86] Exposure parameters include daily breathing rate, exposure time, exposure frequency, exposure duration, average time, and inhalation intake factors. (See Tables AQ-14a to AQ-16 in EIR Appendix F for details of the AERMOD modeling inputs, toxics analysis, and exposure parameters.)

Off-site child residents were assumed to be present at one location during the entire construction period and were evaluated for both the proposed project and the project variant. On-site child residents were assumed to be present beginning after Phase 1 of construction and were also evaluated for both the proposed project and project variant. Off-site and on-site residents were assumed to be present at one location for 30 years, consistent with OEHHA guidance.

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[83] Construction information used in this analysis was developed using the typical construction work day (Monday through Friday) from 7 a.m. – 3:30 p.m. and occasional weekend work. However, work hours are defined as 7 a.m. – 7 p.m., Monday through Friday, and 7 a.m. – 3:30 p.m. on Saturday to provide flexibility and as allowed under the Noise Ordinance and construction regulations. In order to capture the conservative case, construction activities were modeled for eight hours a day from 7 a.m. – 3 p.m., Monday through Friday (modeling must be done in full hour increments, so 3 p.m. was used instead of 3:30 p.m.). This is conservative because of meteorological conditions in San Francisco. The average wind speed is typically higher in the later hours of the day, which results in greater dispersion and lower pollutant concentrations. Further, a lower percentage of wind blows in the direction of the project's maximally exposed residential receptor during the later hours of the day, so the pollutant concentration at that receptor would be lower in the afternoon than for the earlier hours that were modeled.

[84] On November 9, 2005, the U.S. EPA promulgated final revisions to the Federal Guideline on Air Quality Models, in which it recommended that AERMOD be used for dispersion modeling evaluations of criteria air pollutant and toxic air pollutant emissions from typical industrial facilities. U.S. EPA Preferred/Recommended Models, *AERMOD Modeling System*, https://www.epa.gov/scram/air-quality-dispersion-modeling-preferred-and-recommended-models, accessed May 25, 2018.

[85] OEHHA, Air Toxics Hot Spots Program, Risk Assessment Guidelines, Guidance Manual for Preparation of Health Risk Assessment, February 2015, https://oehha.ca.gov/air/crnr/notice-adoption-air-toxics-hot-spots-program-guidance-manual-preparation-health-risk-0, accessed May 25, 2018.

[86] BAAQMD, Air Toxics NSR Program Health Risk Screening Analysis (HRSA) Guidelines, January 2010, http://www.baaqmd.gov/~/media/Files/Engineering/Air%20Toxics%20Programs/hrsa_guidelines.ashx, accessed May 25, 2018.

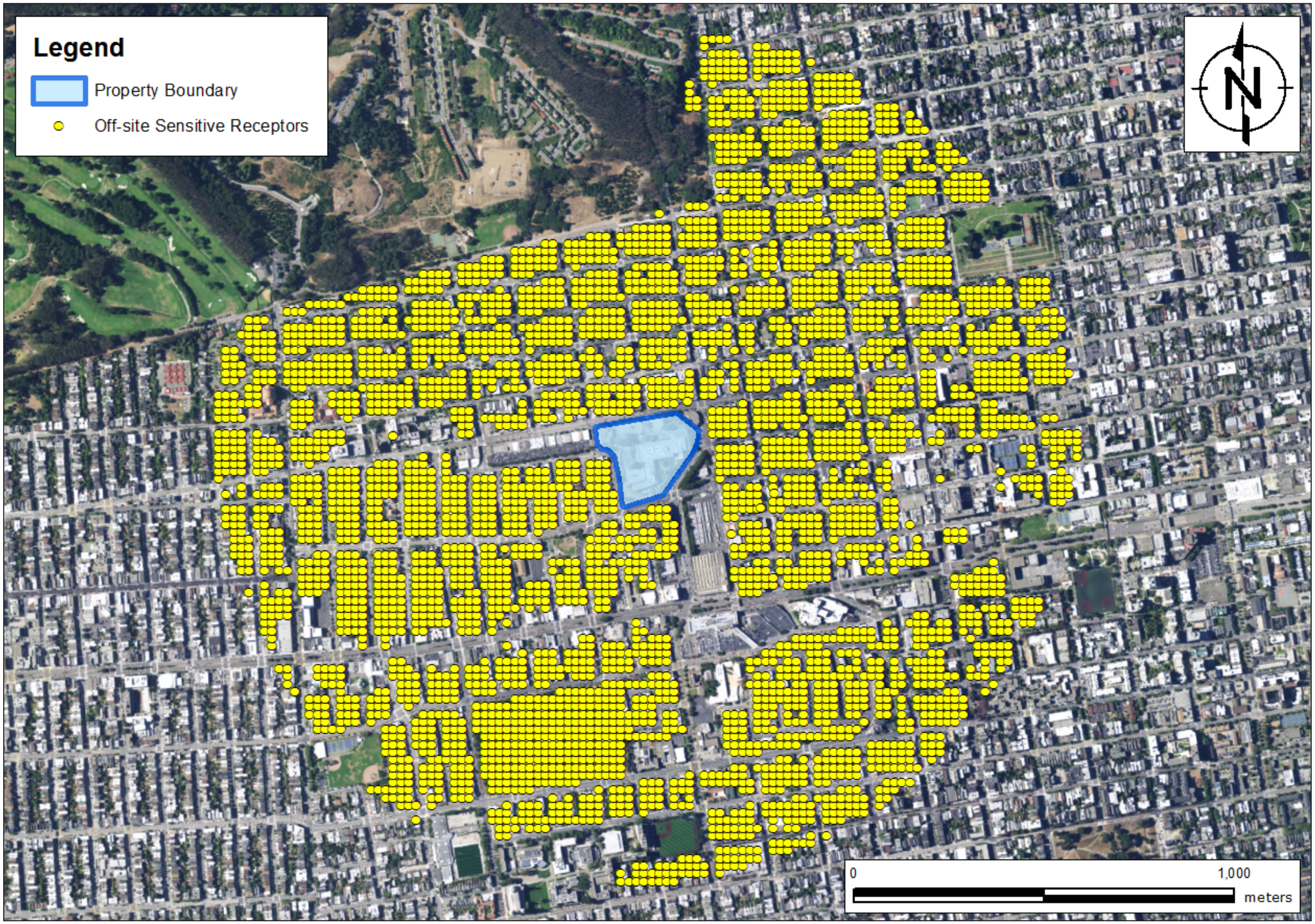
$PM_{2.5}$ concentrations are evaluated on an annual average basis. However, excess cancer risk is evaluated based on lifetime exposure to pollutant concentrations; therefore, the analysis evaluated excess cancer risk as a result of exposure to both construction and operational emissions together. The analysis uses the same conservative assumptions for both the proposed project and project variant, and the health risks are nearly the same for both; thus, only one set of results is presented.

Excess Cancer Risk from Construction and Operation Emissions at Off-Site Receptors. The locations of modeled off-site receptors are presented in Figure 4.E.7: Modeled Off-Site Sensitive Receptor Locations. The maximum estimated excess lifetime cancer risk from all project sources (assuming a receptor was born during construction and exposed to project-related emissions for 30 years) at off-site locations is presented for the proposed project and project variant in Table 4.E.10: Lifetime Cancer Risk and $PM_{2.5}$ Concentration Contributions from the Proposed Project and Project Variant at Maximally Exposed Off-Site Receptors, on p. 4.E.58.

Background risks available from San Francisco's risk reduction plan are from 2014, the most recent comprehensive citywide health risk assessment available to date. As shown in Table 4.E.10 health impacts resulting from the proposed project or project variant plus existing background health impacts from exposure to air emissions results in a total excess cancer risk at the maximally exposed individual sensitive receptor of 36 in 1 million, which is well below 100 in 1 million, the level for causing a new location to meet the APEZ excess cancer risk criteria. Therefore, the proposed project or project variant would result in a less-than-significant impact.

$PM_{2.5}$ Concentrations from Construction and Operational Emissions at Off-Site Receptors. The maximum estimated $PM_{2.5}$ concentrations from all project sources at off-site locations are presented for the proposed project and project variant in Table 4.E.10. As shown in Table 4.E.10, emissions from the proposed project or project variant in combination with existing background concentrations (from 2014) would result in $PM_{2.5}$ concentrations at the maximally exposed individual sensitive receptor of 8.3 $\mu g/m^3$ for both the proposed project and project variant. This is below 10 $\mu g/m^3$, which is the level for causing a new location to meet the APEZ $PM_{2.5}$ concentration criteria. Therefore, this would be a less-than-significant impact. The off-site and on-site maximally exposed individual sensitive receptor locations are presented in Figure 4.E.8: Maximally Exposed Individual Sensitive Receptor Locations.

Excess Cancer Risk from Construction and Operational Emissions at On-Site Receptors. Both the proposed project and the project variant would include development of residential units, which is considered a sensitive land use for purposes of air quality evaluation. The proposed project and project variant would result in construction-related TAC emissions that would affect the occupants of the first phases of the proposed project and project variant and a diesel back-up generator that may also impact these future residents. The estimated excess cancer risk from the emissions of both



SOURCE: Ramboll

Note: This figure does not explicitly identify sensitive receptors on residential locations in the Presidio despite being within the 1,000-meter analysis buffer. These Presidio locations are further away from the proposed project and, due to the nature of the emissions sources, impacts would be lower than for receptors that were explicitly evaluated between the proposed project and the Presidio, and much lower than receptors identified as maximally exposed individuals. Additionally, the maximum CRRP background results over buildings in the Presidio within the 1,000-meter buffer are lower than the background impacts at the receptors where maximum impacts were identified. Therefore, project-related impacts at the Presidio receptors also would not cause cumulative exceedances.

3333 CALIFORNIA STREET MIXED-USE PROJECT

2015-014028ENV

FIGURE 4.E.7: MODELED OFFSITE SENSITIVE RECEPTOR LOCATIONS

Table 4.E.10: Lifetime Cancer Risk and $PM_{2.5}$ Concentration Contributions from the Proposed Project and Project Variant at Maximally Exposed Off-Site Receptors

Source	Lifetime Excess Cancer Risk (in 1 million) NOTE A	$PM_{2.5}$ Concentration (µg/m3) NOTE B
Residential Receptor		
Background NOTE C	12	8.3
Construction - Off-road Emissions	24	0.064
Construction - Vehicle Traffic	0.21	0.00034
Operation - Emergency Generator NOTE D	-0.22	0.00020
Operation - Vehicle Traffic NOTE E	0.13	0.0013
Total	36	8.3
APEZ Criteria	*100*	*10.0*
Significant?	No	No

Notes:

[A] Lifetime excess cancer risk from construction and operations are combined since cancer risk is evaluated over a 30 year period, beginning during the first year of construction and through 23 years of project operations. Thus, the risk takes into account a receptor living near the project site beginning during construction and continuing through operations. The cancer risks were estimated using the equation specified in Tables AQ-18 and AQ-20, in EIR Appendix F.

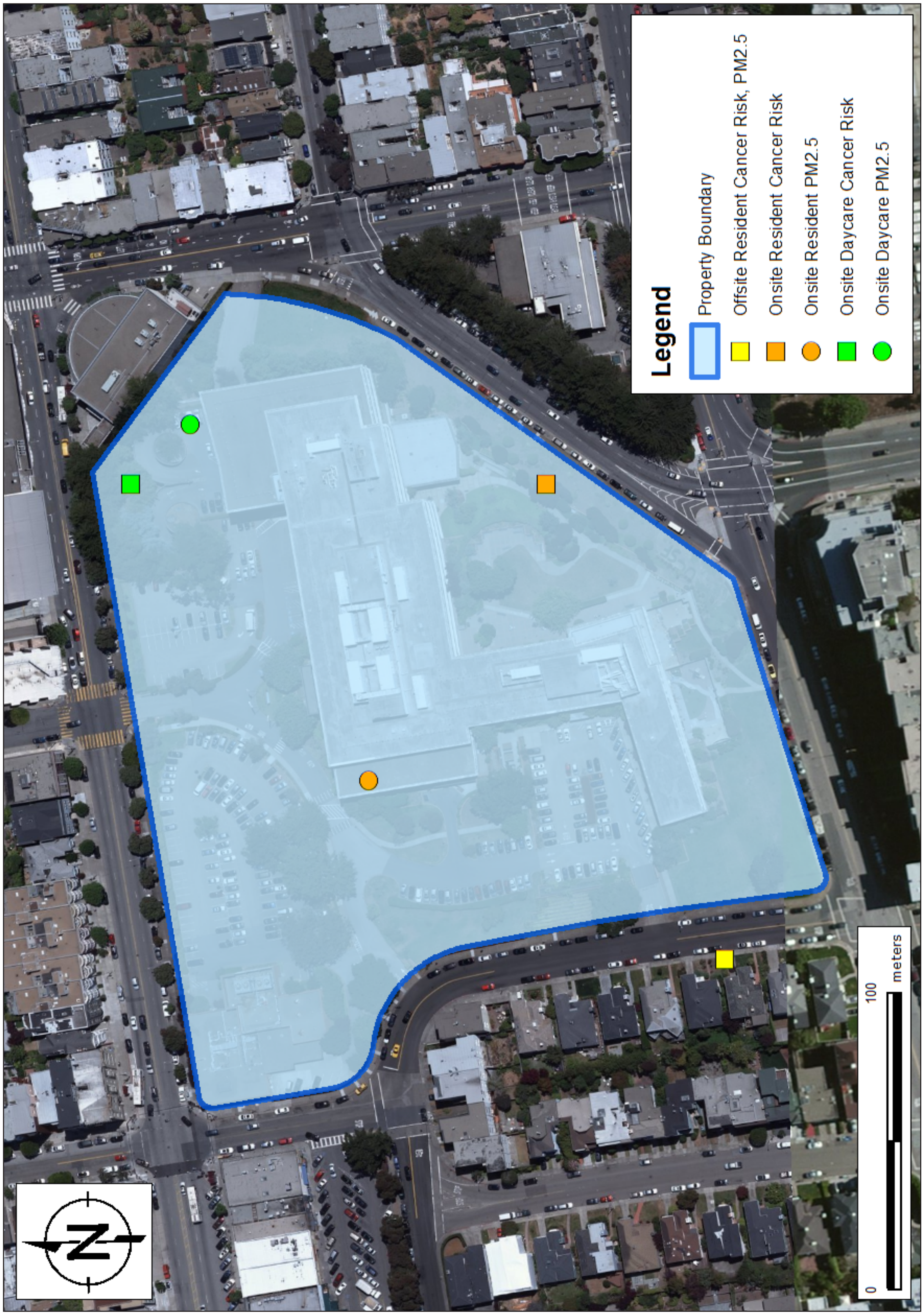
[B] The Maximum Annual Project $PM_{2.5}$ Concentration is the sum of the maximum annual $PM_{2.5}$ concentration that would be attributable to construction emissions and the maximum annual $PM_{2.5}$ concentration that would be attributable to operational emissions. The two maximum values would not necessarily occur at the same receptor location; thus, this is a conservative result. However, since operations would overlap with several of the construction phases, this result would account for that potential overlap. The total shown is the sum of all results prior to rounding.

[C] Background cancer risk and $PM_{2.5}$ concentrations are estimated 2014 background values from the risk reduction plan.

[D] The net impacts from the emergency generator would be the impacts from the proposed project's or project variant's generator emissions minus the impacts from the existing generator emissions that would be removed prior to the start of Phase 2 of the proposed project or project variant. The lifetime excess cancer result is negative (showing a reduction) and the $PM_{2.5}$ concentration is positive (showing an increase); these are different since the maximum project impact for each health endpoint occurs at different receptor locations.

[E] Operational traffic emissions were assumed to be maximum emissions at full project build-out for all years of operations (beginning when Phase 1 becomes operational) as a conservative assumption. On-road emission factors assuming an average fleet in 2022 were used as a conservative assumption, since fleets generally become cleaner over time. Operations during all other years (while construction would still be taking place) would have less emissions than the full build-out year presented above, since only a fraction of the proposed project or project variant would be operational prior to full build-out.

Source: Ramboll, 2017; Tables AQ-18, AQ-19, AQ-20, and AQ-21 in EIR Appendix F



SOURCE: Ramboll

3333 CALIFORNIA STREET MIXED-USE PROJECT

2015-014028ENV

FIGURE 4.E.8: MAXIMALLY EXPOSED INDIVIDUAL SENSITIVE RECEPTOR LOCATIONS

scenarios at the on-site maximally exposed individual sensitive receptor are presented in Table 4.E.11: Lifetime Cancer Risk and $PM_{2.5}$ Concentration Contributions from the Proposed Project and Project Variant at the Maximally Exposed On-Site Receptors. Background risks are available from San Francisco's risk reduction plan from 2014. The proposed project's or project variant's health impacts would combine with existing background health impacts from exposure to air pollution for a lifetime excess cancer risk at the maximally exposed on-site receptor of 45 in 1 million for residential receptors and 34 in 1 million for daycare center receptors.[87] Both cases would not exceed the APEZ excess cancer risk criteria of an excess cancer risk of 100 per 1 million persons exposed. Therefore, the impact with regard to increased cancer risk would be less than significant for on-site receptors for the proposed project and project variant.

$PM_{2.5}$ Concentrations from Construction and Operational Emissions at On-Site Receptors. The maximum estimated $PM_{2.5}$ concentrations from all proposed project and project variant sources at on-site locations are presented in Table 4.E.11. The proposed project's or project variant's emissions would combine with existing background $PM_{2.5}$ concentrations (from 2014) at the maximally exposed on-site receptor to result in $PM_{2.5}$ concentrations of 8.4 $\mu g/m^3$ for residential receptors and 8.7 $\mu g/m^3$ for daycare center receptors. These results would not exceed the APEZ excess $PM_{2.5}$ concentration of 10 $\mu g/m^3$. Therefore, the impact with regard to $PM_{2.5}$ concentrations would be less than significant for on-site receptors for the proposed project and project variant. In summary, the proposed project or project variant would result in a less-than-significant health risk impact on both off-site and on-site sensitive receptors.

Impact AQ-4: The proposed project or project variant would not conflict with implementation of the 2017 Bay Area Clean Air Plan. *(Less than Significant)*

The most recently adopted air quality plan for the San Francisco Bay Area Air Basin is the 2017 Bay Area Clean Air Plan.[88] The 2017 Bay Area Clean Air Plan is a road map that demonstrates how the Bay Area will, in accordance with the requirements of the California Clean Air Act, implement all feasible measures to reduce ozone precursors – ROG and NO_X – and reduce transport of ozone and its precursors to neighboring air basins. It also provides a climate and air pollution control strategy to reduce ozone, PM, toxic air contaminants, and GHGs that builds upon existing regional, state and national programs. In determining consistency with the 2017 Bay Area Clean Air Plan, this analysis considers whether the proposed project or project variant would (1) support the primary goals of the 2017 Bay Area Clean Air Plan, (2) include applicable control measures from the 2017 Bay Area Clean Air Plan, and (3) avoid disrupting or hindering implementation of control measures identified in the 2017 Bay Area Clean Air Plan.

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[87] The health risk assessment approach used in this analysis follows the recommended methodology from OEHHA and BAAQMD, which is protective of children's health and incorporates conservative assumptions for infants and children.

[88] BAAQMD, *2017 Bay Area Clean Air Plan*, April 19, 2017, http://www.baaqmd.gov/~/media/files/planning-and-research/plans/2017-clean-air-plan/attachment-a_-proposed-final-cap-vol-1-pdf.pdf?la=en, accessed May 25, 2018.

Table 4.E.11: Lifetime Cancer Risk and $PM_{2.5}$ Concentration Contributions from the Proposed Project and Project Variant at the Maximally Exposed On-Site Receptors

Source	Lifetime Excess Cancer Risk (in 1 million) NOTE A	$PM_{2.5}$ Concentration (µg/m3) NOTE B
Residential Receptor		
Background NOTE C	19	8.3
Construction – Off-road Emissions	3.5	0.095
Construction – Vehicle Traffic	0.049	0.000087
Operation – Emergency Generator NOTE D	22	0.030
Operation – Vehicle Traffic NOTE E	0.10	0.00016
Total	45	8.4
APEZ Criteria	100	10
Significant?	No	No
Daycare Center Receptor		
Background	33	8.5
Construction – Off-road Emissions	0.51	0.13
Construction – Vehicle Traffic	0.039	0.00017
Operation – Emergency Generator	0.092	0.00012
Operation – Vehicle Traffic	0.22	0.00057
Total	34	8.7
APEZ Criteria	100	10
Significant?	No	No

Notes:

[A] Lifetime excess cancer risk from construction and operations are combined since cancer risk is evaluated over a 30 year period, beginning during the first year of construction and through 23 years of project operations. Thus, the risk takes into account a receptor living at the project site following completion of Phase 1 construction and the remaining construction phases through operations. The cancer risks were estimated using the equation specified in Tables AQ-18 and AQ-20 in EIR Appendix F.

[B] The Maximum Annual Project $PM_{2.5}$ Concentration is the sum of the maximum annual $PM_{2.5}$ concentration that would be attributable to construction emissions and the maximum annual $PM_{2.5}$ concentration that would be attributable to operational emissions. The two maximum values would not necessarily occur at the same receptor location; thus, this is a conservative method. However, since operations would overlap with several of the construction phases, this would account for that potential overlap.

[C] Background cancer risk and $PM_{2.5}$ concentrations are estimated 2014 background values from the risk reduction plan.

[D] The net impacts from the emergency generator would be the impacts from the proposed project's or project variant's generator emissions minus the impacts from the existing generator emissions that would be removed prior to Phase 2 of the proposed project or project variant. The existing generator impacts were subtracted from the existing background impacts at the new on-site receptor locations since the background 2014 value includes the existing emergency generator.

[E] Operational traffic emissions were assumed to be maximum emissions at full project build-out for all years of operations (beginning when Phase 1 becomes operational) as a conservative assumption. On-road emission factors assuming an average fleet in 2022 were used as a conservative assumption, since fleets generally become cleaner over time. Operations during all other years (while construction would still be taking place) would have less emissions than the full build-out year presented above, since only a fraction of the proposed project or project variant would be operational prior to full build-out.

Source: Ramboll 2017; Tables AQ-18, AQ-19, AQ-20, and AQ-21 in EIR Appendix F

The goals of the 2017 Bay Area Clean Air Plan are to protect air quality and health at the regional and local scale and protect the climate. Air quality protection and the safeguarding of public health from harmful air pollutants is accomplished through meeting state and national ambient air quality standards. Climate protection is focused on reducing GHG emissions 40 percent below 1990 levels by 2030 and 80 percent below 1990 levels by 2050.[89] To meet these goals, the 2017 Bay Area Clean Air Plan recommends specific control measures and actions to reduce emissions and decrease concentrations of harmful air pollutants. To this end, the 2017 Bay Area Clean Air Plan includes 85 control measures aimed at reducing air pollutants in the air basin.[90] These control measures are grouped into various categories: stationary source sector, transportation sector, buildings sector, energy sector, agriculture sector, natural and working lands sector, waste sector, water sector, and super-GHG pollutants sector control measures. The 2017 Bay Area Clean Air Plan recognizes that, to a great extent, community design[91] dictates individual travel modes and that a key long-term control strategy to reduce emissions of criteria pollutants, toxic air contaminants, and GHGs from motor vehicles is to channel future Bay Area growth into mixed use pedestrian-friendly communities served by a range of viable transportation options where goods and services meet the day-to-day needs of residents and workers.

The control measures identified in the 2017 Bay Area Clean Air Plan that are most applicable to the proposed project or project variant are transportation sector, building sector, energy sector, natural and working lands sector, waste sector, and water sector control measures, some of which would be implemented as part of, but not limited to, the proposed project's or project variant's compliance with San Francisco's general plan, planning code, green building code, and greenhouse gas reduction strategy. The proposed project or project variant would develop a transportation demand management program (see Chapter 2, Project Description, pp. 2.78-2.79) that would include measures that promote the use of transit, walking and bicycling as viable options to privately owned vehicles.[92] Other transportation-related features that would be included with the proposed project or project variant include providing car-share parking spaces, pursuant to planning code section 166; unbundled parking, pursuant to planning code section 167; and development of electric vehicle charging stations for at least 8 percent of the parking program, pursuant to San Francisco Green Building Code section 5.106.5. Many of the transportation demand management

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89 The air district's 2030 GHG target is consistent with the California's GHG 2030 reduction target, per Senate Bill 32. The Air District's 2050 target is consistent with the state's 2050 GHG reduction target per Executive Order S-3-05.

90 BAAQMD, *2017 Bay Area Clean Air Plan*, Table 5-13.

91 For people who live (and/or work) in low-density, car-oriented developments, the motor vehicle is often the only viable transportation option. In such situations, even the most robust strategy to promote alternative modes of travel can have, at best, only a very modest effect. In contrast, compact communities with a mixture of land uses make it much easier to walk, cycle, or take transit for at least some daily trips.

92 Laurel Heights Partners, LLC, San Francisco Planning Department Transportation Demand Management Application for 3333 California Street, Case File No. 2015-014028, August 7, 2017. This application is being reviewed as part of project entitlements.

measures and other features of the proposed project or project variant would align with the transportation control measures identified in Table 5-13 of the 2017 Bay Area Clean Air Plan, e.g., TR2-Trip Reduction Programs, TR3-Local and Regional Bus Service, TR9-Bicycle and Pedestrian Access and Facilities, TR14-Cars and Light Trucks, and TR15-Public Outreach and Education.

Other features of the proposed project or project variant that would align with the buildings sector, energy sector, natural and working lands sector, waste sector, and water sector control measures of the 2017 Bay Area Clean Air Plan are as follows:

- Development of green roofs and solar photovoltaic infrastructure on 11 of the 13 new and/or adaptively reused buildings (Buildings Sector-B1 Green Buildings and BL4 Urban Heat Island Mitigation)
- Planting of up to 85 net new trees on the project site and its perimeter sidewalks (NW2-Urban Tree Planting)[93]
- Adherence to local policies that promote composting and that aim at achieving zero waste for both construction and operations (WA3-Green Waste Diversion and WA4-Recycling and Waste Reduction)
- Implementation of a non-potable water reuse system in all proposed new and adaptively-reused buildings (WR2-Support Water Conservation)

In addition, the proposed project's or project variant's impact with respect to GHGs is discussed in the initial study (see EIR Appendix B, Topic E.7, Greenhouse Gas Emissions). As stated there, the proposed project and project variant would be compliant with the City's Greenhouse Gas Reduction Strategy and thus would not result in any significant impacts associated with an increase in GHGs or conflict with measures adopted for the purpose of reducing such emissions. The city's greenhouse gas compliance checklist for private projects lists regulatory requirements, many of which are related to transportation, energy conservation, waste reduction, and water conservation and would align with those specific sectors of the 2017 Bay Area Clean Air Plan control measures.

The project site is located within one of the city's transit priority areas indicating that the proposed project or project variant would be developed at a site in a walkable urban area near a concentration of regional and local transit service. There are multiple Muni bus stops on California Street and Presidio Avenue, adjacent to the project site, and Golden Gate Transit bus stops on Geary Boulevard between Masonic and Presidio avenues, less than a quarter mile from the project site. In addition, other viable transportation options would also be available to the proposed residential, daycare, and employment population on the site, i.e., a complete network of sidewalks and bicycle lanes on two adjacent streets (Euclid Avenue and Presidio Avenue). The proposed development (under either the proposed project or the project variant) would be a compact urban infill development with neighborhood-serving uses in the immediate vicinity that would allow for many of the day-to-day needs to be met by walking, bicycling or transit to or from the project site instead

[93] The total number of new street trees could change as engineering designs are developed.

of taking trips via private automobile. These features of the proposed project or project variant would limit substantial growth in automobile trips and vehicle miles traveled. As discussed above under Impact AQ-2, the proposed project's or project variant's anticipated increase in net new a.m. peak hour vehicle trips and net new p.m. peak hour vehicle trips would result in a less than significant increase in air pollutant emissions.[94] Furthermore, transportation sector control measures that are identified in the 2017 Bay Area Clean Air Plan would be required under the general plan and the planning code, through the City's Transit First Policy, bicycle parking requirements, and transportation sustainability fees, along with the transportation demand management program. The transportation sector, building sector, energy sector, natural and working lands sector, waste sector, and water sector control measures would also be required under the general plan, planning code, and green building code. Compliance with these policies, requirements, and fees would ensure the proposed project or project variant includes relevant transportation sector, building sector, energy sector, natural and working lands sector, waste sector, and water sector control measures specified in the 2017 Bay Area Clean Air Plan. Therefore, the proposed project and project variant would include applicable control measures identified in the 2017 Bay Area Clean Air Plan and would support the primary goals of the 2017 Bay Area Clean Air Plan.

Examples of a project that could cause the disruption or delay of 2017 Bay Area Clean Air Plan sector control measures are projects that would preclude the extension of a transit line or bike path, or projects that propose excessive parking beyond city parking requirements. The proposed development (under either the proposed project or the project variant) would be a compact urban infill development located in a neighborhood well-served by local and regional transit. The proposed project or project variant would not preclude the extension of a transit line or a bike path or any other transit improvement. Parking would be provided for the proposed project's or the project variant's mix of uses in accordance with the minimum parking requirements in the planning code. Onsite commercial parking spaces (60) would be provided to replace parking spaces currently available to the public. Additional daycare center parking spaces (21 spaces above the minimum parking requirement) would be provided to serve the passenger loading demands of the daycare center facility. As discussed in Section 4.C, Transportation and Circulation, under Impact TR-2 (pp. 4.C.74-4.C.80), the proposed project's or variant's retail parking exceeds the neighborhood parking rate and it is possible that by doing so, the proposed project could result in VMT that would exceed the VMT significance threshold for the retail component of the project. Impact TR-2 identifies this as a significant impact. However, as explained in Impact AQ-2, even if the proposed project's or project variant's retail component were to result in increased VMT above that captured in the VMT analysis, the proposed project's or project variant's retail-related vehicle trips would need to more than double the total VMT from the proposed project or project variant to exceed the criteria air pollutant significance thresholds.

[94] Kittelson & Associates, Travel Demand Memorandum, Case No. 2015-014028ENV, March 9, 2018.

It is unlikely that providing higher levels of parking for the retail component of the project would result in increased vehicle trips or increased VMT that would exceed the significance thresholds in Impact AQ-2. Therefore, there is no evidence to suggest that the increased parking rate proposed for the project and variant's retail component would result in criteria air pollutant emissions that would hinder implementation of control measures identified in the 2017 Bay Area Clean Air Plan.

Furthermore, the proposed project or project variant would be required to implement Mitigation Measure M-TR-2: Reduce Retail Parking Supply (p. 4.C.80), which requires the proposed project or project variant to lower the number of retail parking spaces to more closely match the existing neighborhood parking rate for retail land uses (between 1.55 and 2.14 spaces per 1,000 gross square feet of the retail floor area).

For the reasons described above, the proposed project or project variant would not interfere with implementation of the 2017 Bay Area Clean Air Plan. As the proposed project or project variant would be consistent with the applicable air quality plan that demonstrates how the region will improve ambient air quality and achieve the state and federal ambient air quality standards, this impact would be less than significant, and no mitigation measures are necessary.

CUMULATIVE IMPACTS

This section discusses the cumulative impacts to air quality that could result from the proposed project or project variant in conjunction with past, present, and reasonably foreseeable future projects within a quarter-mile radius of the project site. The geographic scope of analysis for cumulative air quality construction or operational impacts varies depending on the specific impact. For regional criteria air pollutants, the cumulative area includes the San Francisco Bay Area Air Basin. For toxic air contaminants, the air district has identified a distance of 1,000 feet as an appropriate zone of influence for assessing health risk impacts[95] and specifies that cumulative sources represent the combined total risk values of each individual source within the 1,000-foot evaluation zone. The cumulative health risk analysis conservatively includes reasonably foreseeable projects within an approximately quarter-mile radius (or approximately 1,320 feet) of the project site. The contributions of toxic air contaminants from the proposed project or project variant to health risks beyond a quarter-mile radius of the site and the contributions from projects beyond the quarter-mile radius to health risks at and near this project site would be greatly attenuated through both distance and intervening structures, and their contribution would be expected to be minimal.

[95] BAAQMD, CEQA Air Quality Guidelines, May 2017, p. 5-2.

Impact C-AQ-1: The proposed project or project variant, in combination with past, present, and reasonably foreseeable future development in the project area, would not contribute to cumulative regional air quality impacts. *(Less than Significant)*

The contribution of a project's individual air emissions to regional air quality impacts is, by its nature, a cumulative effect. Emissions from past, present, and future projects in the region also have or will contribute to adverse regional air quality impacts on a cumulative basis. No single project by itself would be sufficient in size to result in non-attainment of ambient air quality standards. Instead, a project's individual emissions contribute to existing cumulative air quality conditions.[96] As described above, the project-level thresholds for criteria air pollutants are based on levels by which new sources are not anticipated to contribute to an air quality violation or result in a considerable net increase in criteria air pollutants. Therefore, because the proposed project's and project variant's emissions do not exceed the project-level thresholds, neither the proposed project or project variant would result in a considerable contribution to cumulative regional air quality impacts. Therefore, this impact would be less than significant.

Impact C-AQ-2: The proposed project or project variant, in combination with past, present, and reasonably foreseeable future development in the project area, would not contribute to cumulative health risk impacts on sensitive receptors. *(Less than Significant)*

The health risk assessment takes into account the cumulative contribution of existing localized health risks to sensitive receptors from sources included in the citywide modeling plus the proposed project's or project variant's sources. There are, however, other future projects, whose emissions have not been incorporated into the existing citywide health risk modeling because analysis with respect to CEQA for these future projects either has not yet been prepared or is pending. This section provides a cumulative health risk analysis that accounts for existing background risks, project risks, and risks from other cumulative sources. Each of these is further described below.

Background Health Risks and $PM_{2.5}$ Concentrations

Citywide modeling of future health risks under 2040 conditions has been conducted by the city. This modeling includes transportation emissions for year 2040 and was based on growth projections that would have reasonably accounted for the traffic emissions from projects listed in Section 4.A, Introduction to Chapter 4, pp. 4.A.6-4.A.13. In general, background (without project) cancer risks in 2040 would be expected to decrease due to newer engines and cleaner vehicle fleets. However, it is not as clear for $PM_{2.5}$ whether concentrations would increase or decrease in year 2040 as traffic volumes increase and a larger fraction of the overall $PM_{2.5}$ concentrations result from brake and tire wear, which are independent of engine exhaust emissions. The 2040 baseline citywide cancer risks and $PM_{2.5}$ concentration were compared to the 2014 existing citywide cancer risks and $PM_{2.5}$

[96] BAAQMD, CEQA Air Quality Guidelines, May 2017, p. 2-1.

concentration, as shown in the EIR Appendix F Tables AQ-20 and AQ-21. The higher of the 2014 and 2040 (and thus more conservative) of the background cancer risks and $PM_{2.5}$ concentrations are presented in this section below. The background values differ based on location and are therefore not the same for every receptor. The higher values (from either 2014 or 2040) are presented below to determine the most conservative cumulative results.

Project Contributions

The methodology for analyzing the proposed project's or project variant's health risk impact and $PM_{2.5}$ contributions at sensitive receptor locations is presented under Impact AQ-3, pp. 4.E.52-4.E.60.

Other Cumulative Projects

Citywide modeling for year 2040 does not include construction emissions from individual projects because these are variable and difficult to predict; however, this cumulative analysis evaluates known construction activities and their future operations within the zone of influence (1,000 feet) that could impact local air quality and affect health risk.[97] The cumulative risks and $PM_{2.5}$ concentrations are evaluated here and presented in Table 4.E.12: Cumulative Lifetime Cancer Risk and $PM_{2.5}$ Concentration Contributions from the Proposed Project at Maximally Exposed Off-Site Receptors and Table 4.E.13: Cumulative Lifetime Cancer Risk and $PM_{2.5}$ Concentration Contributions from the Proposed Project at the Maximally Exposed On-Site Receptors, on pp. 4.E.69.

Cumulative projects that are within an approximately quarter-mile radius (or 1,320 feet) of the project site are identified in Figure 4.A.1: Cumulative Projects, in Section 4.A, Introduction to Chapter 4, p. 4.A.12. There are 9 cumulative projects within this geographic scope (see Section 4.A, Introduction to Chapter 4, pp. 4.A.7-4.A.12, for the list of future projects reviewed and the figure indicating their location in relation to the project site). With the exception of two cumulative projects, the 3700 California Street project and the Geary Rapid Bus Transit Project, discussed further below, the other cumulative projects are much smaller in scale and would have a shorter construction duration than the proposed project and project variant, and they are all further from the proposed project's and project variant's maximally exposed individual sensitive receptors

[97] Future operational traffic from the known cumulative development projects in the project vicinity is captured in the cumulative analysis as part of the background health risk, but additional new stationary sources were not included as they are unknown at this time. However, this analysis did not remove stationary sources that are to be decommissioned as part of the known cumulative development projects. Specifically, any older generators at 3700 California Street that would be decommissioned as part of the site redevelopment would be captured in background health risks modeled in the risk reduction plan, but no new generators were added to this analysis, as none are proposed as part of that project.

Table 4.E.12: Cumulative Lifetime Cancer Risk and $PM_{2.5}$ Concentration Contributions from the Proposed Project at Maximally Exposed Off-Site Receptors

Source	Lifetime Excess Cancer Risk (in 1 million) NOTE A	$PM_{2.5}$ Concentration ($\mu g/m^3$) NOTE B
Residential Receptor		
CRRP Background NOTE C	12	8.3
Project		
Construction – Off-road Emissions	24	0.06
Construction – Vehicle Traffic	0.21	0.00034
Operation – Emergency Generator NOTE D	-0.22	0.00020
Operation – Vehicle Traffic NOTE E	0.13	0.0013
Cumulative Projects NOTE F	3.8	0.26
Cumulative Total	40	8.6
APEZ Criteria	*100*	*10.0*
Significant?	No	No

Notes:

[A] Lifetime excess cancer risk from construction and operations are combined since cancer risk is evaluated over a 30-year period, beginning during the first year of construction and through 23 years of project operations. Thus, the risk takes into account a receptor living near the project site beginning during construction and continuing through operations. The cancer risks were estimated using the equation specified in Tables AQ-18 and AQ-20 in EIR Appendix F.

[B] The Maximum Annual Project $PM_{2.5}$ Concentration is the sum of the maximum annual $PM_{2.5}$ concentration that would be attributable to construction emissions and the maximum annual $PM_{2.5}$ concentration that would be attributable to operational emissions. The two maximum values would not necessarily occur at the same receptor location; thus, this is a conservative result. However, since operations would overlap with several of the construction phases, this would account for that potential overlap.

[C] Background cancer risk are estimated 2014 background values from *The San Francisco Community Risk Reduction Plan: Technical Support Documentation.* Background $PM_{2.5}$ concentrations are estimated 2040 background values from the risk reduction plan (and adjusted for 2040 traffic volumes).

[D] The net impacts from the emergency generator would be the impacts from the proposed project's or project variant's generator emissions minus the impacts from the existing generator emissions that would be removed prior to the start of Phase 2 of the proposed project or project variant.

[E] Operational traffic emissions were assumed to be maximum emissions at full project build-out for all years of operations (beginning when Phase 1 becomes operational) as a conservative assumption.

[F] Cumulative Project results are the estimated values from the additional cumulative projects identified in Section 4.A, pp. 4.A.7-4.A.12, as well as impacts from cumulative traffic estimated by Ramboll.

Sources: Ramboll, 2017; Tables AQ-18, AQ-19, AQ-20, and AQ-21 in EIR Appendix F; BAAQMD, SFDPH, and San Francisco Planning Department, *The San Francisco Community Risk Reduction Plan: Technical Support Documentation*, 2012

Table 4.E.13: Cumulative Lifetime Cancer Risk and $PM_{2.5}$ Concentration Contributions from the Proposed Project at the Maximally Exposed On-Site Receptors

Source	Lifetime Excess Cancer Risk (in 1 million) NOTE A	$PM_{2.5}$ Concentration ($\mu g/m^3$) NOTE B
Residential Receptor		
CRRP Background NOTE C	20	8.4
Project		
Construction – Off-road Emissions	3.5	0.095
Construction – Vehicle Traffic	0.049	0.000087
Operation – Emergency Generator NOTE D	22	0.030
Operation – Vehicle Traffic NOTE E	0.10	0.00016
Cumulative Projects NOTE F	3.6	0.26
Cumulative Total	49	8.8
APEZ Criteria	100	10
Significant?	No	No
Daycare Center Receptor		
CRRP Background NOTE C	33	8.5
Project		
Construction – Off-road Emissions	0.51	0.13
Construction – Vehicle Traffic	0.039	0.00017
Operation – Emergency Generator	0.092	0.00012
Operation – Vehicle Traffic	0.22	0.00057
Cumulative Projects NOTE F	3.8	0.26
Cumulative Total	37	8.9
APEZ Criteria	100	10
Significant?	No	No

Notes:

[A] Lifetime excess cancer risk from construction and operations are combined since cancer risk is evaluated over a 30-year period, beginning during the first year of construction and through 23 years of project operations. Thus, the risk takes into account a receptor at the project site following completion of Phase 1 construction activities and for the duration of remaining construction phases continuing through operations. The cancer risks were estimated using the equation specified in Tables AQ-18 and AQ-20 in EIR Appendix F.

[B] The Maximum Annual Project $PM_{2.5}$ Concentration is the sum of the maximum annual $PM_{2.5}$ concentration that would be attributable to construction emissions and the maximum annual $PM_{2.5}$ concentration that would be attributable to operational emissions. The two maximum values would not necessarily occur at the same receptor location; thus, this is a conservative method. However, since operations would overlap with several of the construction phases, this would account for that potential overlap.

[C] CRRP background cancer risk and $PM_{2.5}$ concentrations are estimated 2040 background values from *The San Francisco Community Risk Reduction Plan: Technical Support Documentation* (and adjusted for 2040 traffic) for the on-site residential receptor. CRRP background cancer risk and $PM_{2.5}$ concentrations are estimated 2014 background values from the risk reduction plan for the on-site daycare center receptor.

[D] The net impacts from the emergency generator would be the impacts from the proposed project's or project variant's generator emissions minus the impacts from the existing generator emissions that would be removed prior to the start of Phase 2 of the proposed project or project variant. The existing generator impacts were removed from the new on-site receptors since the background 2040 value includes the existing emergency generator.

[E] Operational traffic emissions were assumed to be maximum emissions at full project build-out for all years of operations (beginning when Phase 1 becomes operational) as a conservative assumption.

[F] Cumulative Project results are the estimated values from the additional cumulative projects identified in Section 4.A, pp. 4.A.7-4.A.12, as well as impacts from cumulative traffic estimated by Ramboll.

Sources: Ramboll, 2017; Tables AQ-18, AQ-19, AQ-20, and AQ-21 in EIR Appendix F; BAAQMD, SFDPH, and San Francisco Planning Department, *The San Francisco Community Risk Reduction Plan: Technical Support Documentation*, 2012 than the proposed project and project variant. As such, their impacts would be de minimis at the proposed project's and project variant's off-site and on-site maximally exposed individual sensitive receptor locations.

The CEQA documentation for the proposed mixed-use project at 2670 Geary Boulevard (approximately 750 feet south of the project site) indicates that it is below the screening criteria for criteria air pollutant analysis and that a health risk assessment was not required. Therefore, this project was excluded from further analysis in this review because it would not generate substantial TACs. Additionally, four of the other future projects (the California Laurel Village Improvement Project, the Masonic Avenue Streetscape Project, the Laurel Heights-Jordan Park Traffic Calming Project, and the Muni Forward improvements along California Street) as well as the pavement renovation projects identified for the segments of Laurel Street between California Street and Mayfair Drive and Euclid and Lupine avenues were determined to be minor with respect to construction activity and air quality impacts near the proposed project's or project variant's maximally exposed individual sensitive receptor and were thus excluded from further analysis. Specifically, the projects will be limited in size and construction duration, and are therefore not expected to require heavy construction equipment that would negatively affect air quality for a substantial amount of time. Furthermore, these streetscape projects are expected to be completed prior to initiation of construction of the proposed project or project variant. The future projects located at 2675 Geary Boulevard (approximately 1,200 feet south of the project site) and 726 Presidio Avenue (approximately 400 feet southeast of the project site) were determined to be minor with respect to air quality health impacts based on screening criteria for project size and distance to the subject project site in the BAAQMD Screening Tables for Air Toxics Evaluation During Construction.[98]

The 3700 California Street project is of sufficient size and close enough in proximity to, although farther than 1,200 feet from, the proposed project or project variant that additional quantitative modeling was performed to evaluate cumulative construction impacts of this project. Default assumptions in CalEEMod and publicly available information about the location and size of the 3700 California Street project were used to estimate construction emissions. Similar to the methodology used for project construction, a construction area source covering the entire 3700 California Street site was modeled in AERMOD and combined with CalEEMod emissions results and health risk calculations to obtain an estimated risk at the proposed project's or project variant's maximally exposed individual sensitive receptor. Operational health risks from this project were not included in the analysis because existing onsite generators would be removed and the project would not result in any new stationary sources. Additionally, the project would redevelop a hospital with residential uses, thus the vehicle trips associated with the project would substantially decrease

98 BAAQMD, Screening Tables for Air Toxics Evaluation During Construction, May 2010, http://www.baaqmd.gov/~/media/Files/Planning%20and%20Research/CEQA/CEQA_Construction_Screening_Approach.ashx, accessed May 25, 2018.

below existing levels. Therefore, that project would result in a net reduction in operational health risks from existing conditions.

Additionally, the Geary Bus Rapid Transit project is of sufficient size and close enough in proximity to the proposed project or project variant that it should be included in the evaluation of cumulative construction impacts of the proposed project or project variant. Health impacts for the construction and operation of the Geary Bus Rapid Transit Project were calculated as part of that project's environmental review.[99] The maximum health risk impacts identified for the Geary Bus Rapid Transit Project were added to impacts at the proposed project's or project variant's maximally exposed individual sensitive receptor, which is very conservative. In reality, health risks from the Geary Bus Rapid Transit project are expected to be smaller at the proposed project's or project variant's maximally exposed individual sensitive receptor based on the fact that the proposed project's or project variant's maximally exposed individual sensitive receptor is much further from the Geary Bus Rapid Transit construction emissions sources.

Cumulative Results

Cumulative health risks are determined by summing the background risks, project risks, and risks from reasonably foreseeable cumulative projects not already included in the background risk and $PM_{2.5}$ assessment. Similarly, cumulative $PM_{2.5}$ concentrations are determined by summing the background $PM_{2.5}$ concentrations, project $PM_{2.5}$ concentrations, and $PM_{2.5}$ concentrations from reasonably foreseeable cumulative projects not already included in the background $PM_{2.5}$ assessment. Results of this analysis at the maximum off-site receptor are presented in Table 4.E.12. The cumulative lifetime excess cancer risk at the maximally exposed off-site residential receptor would be 40 in a million and the $PM_{2.5}$ concentration would be 8.6 $\mu g/m^3$.

Results of this analysis at the maximum on-site receptor are presented in Table 4.E.13. The cumulative lifetime excess cancer risk at the maximally exposed on-site residential receptor would be 49 in a million and the $PM_{2.5}$ concentration would be 8.8 $\mu g/m^3$. The cumulative lifetime excess cancer risk at the maximally exposed on-site daycare center receptor would be 37 in a million and the $PM_{2.5}$ concentration would be 8.9 $\mu g/m^3$.

As shown in the Table 4.E.12 and 4.E.13 addition of the proposed project's or project variant's cancer risk to 2040 conditions would not result in new locations meeting the APEZ criteria. Therefore, the proposed project or project variant plus existing background risks and cumulative development projects would not result in significant cumulative health risk impacts. Similarly, as shown in the tables below, addition of the proposed project's or project variant's $PM_{2.5}$

[99] City and County of San Francisco, Geary Corridor Bus Rapid Transit Project, Draft Environmental Impact Statement/Environmental Impact Report (EIS/EIR), September 2015, https://www.sfcta.org/sites/default/files/content/Planning/GearyCorridorBusRapidTransit/DraftEIR/Geary%20Corridor%20Bus%20Rapid%20Transit%20Project%20Draft%20EIS_EIR.pdf, accessed June 4, 2018. The EIR was certified in December 2016.

concentration to 2040 conditions would not result in new locations meeting the APEZ criteria. Therefore, the proposed project or project variant plus background $PM_{2.5}$ concentrations and cumulative development projects would not result in significant cumulative $PM_{2.5}$ impacts and the proposed project or project variant would not contribute considerably to a significant cumulative air quality impact. Therefore, no mitigation measures are necessary.

F. INITIAL STUDY SUPPLEMENT

INTRODUCTION

As discussed in Chapter 1, Introduction, the initial study for the 3333 California Street Mixed-Use Project was published and made available for public review on April 25, 2018 (see EIR Appendix B). The initial study was prepared to determine whether any aspect of the proposed project or project variant, either individually or cumulatively, would cause a significant effect on the environment. It narrowed the focus (or scope) of the environmental analysis by identifying which impacts would be less than significant (either without mitigation or with mitigation measures included in the proposed project or project variant), and, therefore, were adequately analyzed in the initial study, and which impacts were potentially significant requiring further analysis in the EIR.

The initial study found that the following potential individual and cumulative environmental impacts of the proposed project or project variant would result in less-than-significant impacts or less-than-significant impacts with mitigation and did not require further analysis in the EIR: land use and planning, population and housing, cultural resources (archeological resources, human remains, and tribal cultural resources), transportation and circulation (aviation-related topics), noise (aviation-related topics), air quality (odors only), greenhouse gas emissions, wind and shadow, recreation, utilities and services systems, public services, biological resources, geology and soils, hydrology and water quality, hazards and hazardous materials, mineral and energy resources, and agricultural and forest resources. As such, these topics are not further addressed in this EIR. The initial study determined that the proposed project or project variant could result in potentially significant environmental impacts in four environmental topic areas, analyzed earlier in this EIR in the following sections: Section 4.B, Historic Architectural Resources; Section 4.C, Transportation and Circulation; Section 4.D, Noise and Vibration; and Section 4.E, Air Quality.

PUBLIC COMMENTS ON THE INITIAL STUDY

Following publication of the initial study, 15 comment letters and emails were submitted to the planning department. The planning department considered the public comments in preparation of this EIR. Comments on the initial study that relate to environmental issues, as well those about project design, merits of the proposed project or project variant, and related concerns that are not physical environmental impacts, are summarized in Chapter 1, Introduction, pp. 1.5-1.17. Many of the comments received on the initial study either were addressed in the relevant sections of the initial study or are addressed in Section 4.B, Historic Architectural Resources; Section 4.C, Transportation and Circulation; Section 4.D, Noise and Vibration; or Section 4.E, Air Quality, of this EIR. However, as discussed below, this section clarifies and supplements the analysis in the initial study.

SUPPLEMENTAL INFORMATION

In response to issues raised in the initial study comments, and to incorporate clarifying information on select environmental topics, this initial study supplement describes the regulatory process for site remediation (or handling and cleanup) of known and suspected contaminated soils and other hazardous materials on the site in the Hazards and Hazardous Materials subsection below; provides additional information related to the demand for, and supply of, public school facilities in the Public Services subsection; and updates information related to energy consumption in the Mineral and Energy Resources subsection. In addition, calculation errors in the supporting documentation for the Mineral and Energy Resources section of the initial study were identified and corrected; these corrections do not change any of the conclusions related to energy resources. The revised Energy Assessment and Calculations memorandum has been added to the AB 900 Record of Proceedings.[1]

HAZARDS AND HAZARDOUS MATERIALS

Under federal and state laws, “discarded materials” and other “wastes” may be considered “hazardous waste” if they are specifically listed by statute as such or if they are poisonous (toxicity), can be ignited by open flame (ignitability), corrode other materials (corrosivity), or react violently, explode or generate vapors when mixed with water (reactivity). The term “hazardous material” is defined in state law as any material that, because of quantity, concentration, or physical or chemical characteristics, poses a significant present or potential hazard to human health and safety or to the environment.[2] A hazardous material can include a hazardous substance, hazardous waste, or any other materials where a potential risk to human health or the environment has been identified. Hazardous chemicals, radioactive materials, and biohazardous materials are generally referred to as hazardous materials. The term “hazardous chemicals” excludes radioactive materials and biological materials. A “radioactive material” is a special type of hazardous material that contains atoms with unstable nuclei that spontaneously emit ionizing radiation to increase their stability. A “biohazardous material” or “biohazard” could contain infectious agents (microorganisms, bacteria, molds, parasites, or viruses that normally contribute to increased human mortality). “Medical waste” refers to both biohazardous waste and sharps waste (devices capable of cutting or piercing, such as hypodermic needles, razor blades, and broken glass).

Federal and state laws require that hazardous materials be specially managed and that excavated soils having concentrations of contaminants such as, but not limited to, lead, gasoline, volatile organic compounds, and select industrial solvents that are higher than certain acceptable levels,

[1] SWCA, Revised Final 3333 California Street Mixed-Use Project Energy Assessment and Calculations, Case No. 2015-014028ENV, July 23, 2018.
[2] California Health and Safety Code, chapter 6.95, section 25501(o).

be specially managed, treated, transported, and/or disposed of as a hazardous waste. The California Code of Regulations (title 22, sections 66261.20-24) contains technical descriptions of characteristics that would cause a soil, once excavated and discarded, to be designated a hazardous waste. The state regulations are compliant with federal regulations and, in most cases, are more stringent.

CURRENT AND PAST SITE USE

Existing uses at the UCSF Laurel Heights Campus at 3333 California Street include instruction and research laboratories. Past site uses included a corporate office campus with an associated onsite automobile service station and the Laurel Hill Cemetery. The laboratory use includes on-site storage and use of hazardous chemicals and biohazardous and radioactive materials, as well as the generation and disposal of such wastes. The UCSF Laurel Heights Campus is currently permitted for use, storage, generation, transport, and disposal of hazardous materials and hazardous waste by local, regional, and state regulatory agencies such as the San Francisco Department of Public Health (health department), the Bay Area Air Quality Management District, the California Public Health Department's Radiologic Health Branch, and the California Environmental Protection Agency's Department of Toxic Substances Control. The laboratory uses could have resulted in the entrainment (or capture and settling) of radioactive materials in laboratory equipment including associated plumbing due to secondary washes. The past on-site uses included the use and storage of petroleum products, including underground fuel sand waste oil storage tanks. Use of such materials could have resulted in accidental release of hazardous substances resulting in subsurface contamination at the site.

The initial study disclosed the recognized environmental conditions related to current and past uses such as the UCSF laboratories and the former automobile service station. The closure history for underground fuel storage tanks as well as the presence of hazardous materials in the existing structures proposed for demolition and the underlying soils that would be excavated (naturally occurring asbestos) was disclosed in Section A, Project Description, pp. 74-81 of the initial study. These recognized environmental conditions for the 3333 California Street site were summarized in the initial study (pp. 228-231). Summary information was based on a review of Langan's *Phase 1 Environmental Site Assessment*, *Environmental Site Investigation Report*, *Additional Soils Investigation Report for Annex Building Area*, *Preliminary Geotechnical Investigation*; project sponsor and health department communications related to enrollment in the Maher Program and submission of Maher Application for review of required approach to site remediation in light of existing conditions; and Langan's *Site Assessment and Proposed Mitigation Letter* in response to the health department's request for the evaluation of soil gas results against residential screening levels. The hazards and hazardous materials issues associated with current and historic uses at the 3333 California Street site as well as subsurface characteristics such as the presence of naturally occurring asbestos, and the legal requirements for the proposed site redevelopment are evaluated in the initial study (see EIR Appendix B, pp. 231-240).

Existing Hazardous Materials Use

As described in the initial study, pp. 230-231, current use and disposal of hazardous materials (including radioactive materials) associated with UCSF uses are regulated, permitted, and licensed through a Radioactive Materials License issued by the California Department of Public Health's Radiologic Health Branch. UCSF employs laboratory quantities of radioactive[3], chemical, and biological materials consistent with bio-medical research activities. All hazardous materials use and removal is managed in accordance with federal, state, and local regulations. Radioactive, chemical, and biological waste is captured by University of California Environmental Health and Safety staff and disposed of through authorized, licensed vendors. Liquid biological waste is disinfected prior to drain disposal.

These substances are typical of those associated with numerous medical facilities throughout San Francisco, and in that respect do not pose any unusual hazards. However, if improperly handled or released, the use of chemicals, materials containing biohazards, and radioactive substances could cause injury, damage, or fire. The hazardous substances currently in use and stored in the UCSF laboratories are in small volumes that are readily contained, and activities involving them are conducted in accordance with specific containment standards that minimize the potential for releases. Bio-medical research is often performed in closed loop systems, which are designed to capture and collect waste. However, plumbing associated with laboratory uses (sinks, pipes, etc.) are not part of that system and wastewater flows are pre-treated in accordance with an industrial wastewater discharge permit prior to discharge to the combined sewer system.[4]

Hazardous materials transport is regulated at the federal[5] and state levels. Within California, the state agencies with primary responsibility for enforcing federal and state regulations and responding to transportation emergencies are the California Highway Patrol and the California Department of Transportation. Together, federal and state agencies determine driver training requirements, load labeling procedures, and container specifications. Although special requirements apply to transporting all hazardous materials, requirements for transporting

[3] Most laboratory work with radioactive materials involves handling relatively small quantities (typically less than one millicurie). The most common radionuclides handled are expected to be phosphorus-32 and sulfur-35, but others, such as carbon-14, tritium (hydrogen-3), and iodine-125, could also be used on occasion. Carbon-13 and tritium are long-lived; they have half-lives greater than 90 days. Any materials that come into contact with radioactive materials, e.g. containers, are also considered radioactive waste.

[4] Langan Treadwell Rollo, Phase I Environmental Site Assessment for 3333 California Street, December 3, 2014, pp. 19-21 and e-mail communication between Lisa Congdon, Project Manager, Prado Group, Inc and D. Travis Clark, Environmental Programs, UC San Francisco, September 17, 2018.

[5] The U.S. Department of Transportation regulates hazardous materials transportation between states.

hazardous waste are more stringent, and hazardous waste haulers must be licensed to transport hazardous waste on public roads.

The California Department of Public Health's Radiologic Health Branch administers the state's Radiation Control Law, which governs the storage, use, transportation, and disposal of sources of ionizing radiation (radioactive material and radiation-producing equipment) pursuant to the federal Atomic Energy Act, which requires states to assume responsibility for the use, transportation, and disposal of low-level radioactive material and for the protection of the public, radiation workers, and the environment from radiation hazards.[6] Radioactive material regulations require registration of sources of ionizing radiation, licensing of radioactive material, and protection against radiation exposure. The Radiologic Health Branch licenses institutions that use radioactive materials. It also regulates the transportation of radioactive materials and disposal of radioactive waste. Users of radioactive materials must maintain detailed records regarding the receipt, storage, transfer, and disposal of such materials. State regulations concerning radioactive substances are included in California Code of Regulations Title 17. The regulations specify appropriate use and disposal methods for radioactive substances, as well as worker safety precautions and worker health monitoring programs. In addition, UCSF is required to pretreat its wastewater before discharge to the combined sewer system , as governed under the San Francisco Industrial Wastewater Discharge Permit.

Medical waste handling is governed by the California Medical Waste Management Act. This act applies to the generation, transportation, treatment, storage, and disposal of medical waste, and imposes a cradle-to-grave tracking system and calibration and monitoring system for on-site treatment. The Emergency, Restoration, and Waste Management section of the Environmental Management Branch of the California Department of Public Health regulates the medical waste industry and coordinates the Medical Waste Management Program. Facilities in San Francisco that treat medical wastes must obtain a permit and are subject to audits by the health department. Medical waste is to be transported in closed red bags marked "biohazard" and placed inside hard-walled containers with lids.

Compliance with the legal requirements for the use, storage, generation, transport and disposal of hazardous materials is administered through the University of California Office of Environmental Health and Safety's policies, standards, rules, and regulations and Laurel Heights-specific transport plan for hazardous materials deliveries. The University of California Office of Environmental Health and Safety is required to decommission the laboratories and other portions

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[6] California Department of Public Health, Center for Environmental Health, https://www.cdph.ca.gov/Programs/CEH/Pages/CEH.aspx, Radiologic Health Branch, https://www.cdph.ca.gov/Programs/CEH/DRSEM/Pages/RHB.aspx, and Environmental Management Branch, https://www.cdph.ca.gov/Programs/CEH/DRSEM/Pages/EMB/MedicalWaste/MedicalWaste.aspx, accessed August 6, 2018.

of the premises where hazardous materials have been used or stored prior to vacating the site. Closure of all hazardous materials licenses and use permits would include inspections and approvals from applicable regulatory agencies, as well as transportation and disposal of all hazardous chemical, radioactive, and biohazardous materials in accordance with regulations that minimize the potential for releases and off-site exposure. All closure protocols related to the laboratory uses would be completed prior to any site disturbance. As described in Chapter 2, Project Description, all equipment, including fume hoods, centrifuges, sinks, pipes, and storage containers associated with laboratory uses (which could contain residual radioactive substances) would be decommissioned or removed in accordance with these regulations.

Contaminated Soils and Groundwater

Contaminated soils and/or groundwater would be encountered during excavation which would require handling hazardous materials and disposal of hazardous waste during construction of the proposed project or project variant. As described in the initial study, pp. 228-238, the project site is located in an area with known or suspected hazardous materials contamination and is included on hazardous materials site lists compiled pursuant to Government Code section 65962.5 (also known as the Cortese List). The Phase 1 Environmental Site Assessment prepared for the subject property indicates that the site was listed in the following governmental databases: California Facility Inventory Database Underground Storage Tanks (CA FID UST); Statewide Environmental Evaluation and Planning System Underground Storage Tanks (SWEEPS UST); Federal Insecticide, Fungicide, and Rodenticide Act/Toxic Substances Control Act Tracking System (FTTS); Historic Federal Insecticide, Fungicide, and Rodenticide Act/Toxic Substances Control Act Tracking System (HIST FTTS); Facility Index System/Facility Registry System (FINDS); Hazardous Substance Storage Container Underground Storage Tanks (HIST UST); Recovered Government Archive Leaking Underground Storage Tanks (RGA LUST); Resource Conservation and Recovery Act-Small Quality Generator (RCRA-SQG); Integrated Compliance Information System (ICIS); Hazardous Waste and Substances Site List (HIST CORTESE); Leaking Underground Storage Tanks (LUST); Active Underground Storage Tanks (UST); Facility and Manifest Data (HAZNET); Resource Conservation and Recovery Act Non Generators/No Longer Regulated (RCRA NonGen/NLR); and Emissions Inventory Data (EMI).[7] As described on pp. 230-231 of the initial study, the eight underground fuel storage tanks located on the north portion of the site (seven near the annex building and one near Presidio Avenue) were removed between 1988 and 1998. Contaminated soils have been identified in the vicinity of the removed underground storage tanks.

Federal and state laws and regulations relating to underground storage tanks include permitting, monitoring, closure, and cleanup requirements. The California Environmental Protection Agency

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7 Langan Treadwell Rollo, Phase I Environmental Site Assessment for 3333 California Street, December 3, 2014, pp. 9-13 and Appendix A, Environmental and Regulatory Records Documentation.

certified the San Francisco Department of Public Health as a Certified Unified Program Agency in 1996. Six state environmental programs (hazardous materials storage, hazardous waste generation, hazardous waste treatment, underground tanks, above ground petroleum storage, and regulated substances) and two local programs (chlorofluorocarbon recycling and medical waste) were consolidated and continue to be implemented by the health department under the Hazardous Materials and Waste Program, which is the state-designated enforcement program in San Francisco for the Hazardous Materials Unified Program Agency (HMUPA). The primary goal of HMUPA is to protect public health and the environment by promoting compliance with applicable laws and regulations. HMUPA accomplishes this goal through education, community and industry outreach, inspections and enforcement. Hazards regulations set forth construction monitoring standards, monitoring standards for existing tanks, release reporting requirements, and closure requirements. Typical site mitigation plans imposed under article 22A of the San Francisco health code (the Maher Ordinance) and developed in accordance with the site-specific health department requirements require protocols for notification and sampling to ensure adequate characterization of contaminated soils and building materials. Thus, the health department is designated to permit and inspect underground storage tanks, implement related regulations, and oversee the removal of underground storage tanks. The health department also has local jurisdiction over the use and storage of hazardous materials and waste. In conformance with state law, each removed tank on the project site has been registered with the health department and the San Francisco Bay Area Regional Water Quality Control Board (RWQCB).

The project sponsor submitted a Phase 1 Environmental Site Assessment and associated documentation to the health department in accordance with article 22A of the San Francisco health code (the Maher Ordinance). The health department reviewed the documentation of on-site contamination related to the current and past site uses, and, based on their assessment and the associated documentation, determined that a site mitigation plan would be required, and that further soil testing would be needed to determine the full scope of site remediation under the site mitigation plan as related to the potential presence of volatile organic compounds above residential screening levels established by the San Francisco Bay RWQCB.

As noted in the initial study (pp. 235-236) the project site is underlain by serpentine rock. Serpentinite commonly contains naturally occurring chrysotile asbestos or tremolite-actinolite, a fibrous mineral that can be hazardous to human health if airborne emissions are inhaled. The proposed project would involve construction throughout the project site. In the absence of proper controls, fugitive dust and airborne asbestos could become airborne during excavation and handling of excavated materials. On-site workers and the public could be exposed to airborne asbestos unless appropriate control measures are implemented. Although the California Air Resources Board has not identified a safe exposure level for asbestos in residential areas, exposure to low levels of asbestos for short periods of time poses minimal risk.[8] To address health concerns from exposure to airborne asbestos, the California Air Resources Board enacted an Asbestos Airborne Toxic Control Measure for Construction, Grading, Quarrying, and Surface Mining Operations in July 2001. The requirements established by the Asbestos Airborne Toxic Control Measure are contained in California Code of Regulations Title 17, section 93105 and are enforced by the Bay Area Air Quality Management District.

The Asbestos Airborne Toxic Control Measure requires that construction and grading operations that disturb more than one acre (such as the project site) must prepare and obtain air district approval for an asbestos dust mitigation plan. Asbestos dust mitigation plans must specify how the operation will minimize emissions and must address specific emission sources. Regardless of the size of the disturbance, activities must not result in emissions that are visible crossing the property line. The asbestos dust mitigation plan must contain dust mitigation measures addressing topics such as the control of dust tracked out from the construction site, the limitation of dust emissions from the offsite transportation of excavated soil, and the management of on-site soils. The Asbestos Airborne Toxic Control Measure also allows air districts to require that an asbestos dust mitigation plan provide for ambient air monitoring for asbestos. Typically, in an asbestos dust mitigation plan where a local air district requires air monitoring for asbestos at a specific site, the local air district will request that the asbestos dust mitigation plan establish specific action levels based on health risk assessment protocols established by the state Office of Environmental Health Hazard Assessment. These action levels, when exceeded based on air monitoring results, would require the construction contractors to implement more stringent measures or require construction to stop depending on the action level violated. And finally, asbestos dust mitigation plans require that records related to the applicability of the regulation or compliance with the specific provisions of the regulation or the asbestos dust mitigation plan be kept for seven years. The results of any air monitoring or bulk sampling required by a local air district, any bulk sampling to document the applicability of, or compliance with, the regulation, and any other records specified in the asbestos dust mitigation plan must be reported to the local air district. Thus, construction activities must be conducted in accordance with the asbestos dust mitigation plan that has been approved by the Bay Area Air Quality Management District.

In 2008, the San Francisco Board of Supervisors approved the Construction Dust Control Ordinance to reduce fugitive dust generated during construction activities. The requirements for construction dust control, as identified in the Construction Dust Control Ordinance, require the development of a construction dust control plan for sites over one-half acre with sensitive receptors within 1,000 feet. As noted in the initial study (p. 232), the project sponsor would be required to comply with the Construction Dust Control Ordinance (article 22B) and would

[8] California Air Resources Board, Fact Sheet #1 Health Information on Asbestos, 2002, http://www.arb.ca.gov/toxics/Asbestos/1health.pdf, accessed September 24, 2018.

develop a construction dust control plan that includes a suite of best management practices, e.g., limiting travel on unpaved areas of site, wetting and tarping soil piles, and procedures for perimeter PM_{10} monitoring. The health department would review and approve this plan prior to any site work and provide notice of its approval to the Department of Building Inspection. Furthermore, the site mitigation plan developed under article 22A also would include dust control and excavation management measures to ensure that the asbestos dust mitigation plan includes the application of best management practices for fugitive dust from construction, grading and excavation operations. The Asbestos Airborne Toxic Control Measure requires construction activities in areas where airborne asbestos is likely to be found to employ best available dust control measures.[9] The requirements for dust control as identified in the Construction Dust Control Ordinance are as effective as the dust control measures identified in the Asbestos Airborne Toxic Control Measure. Thus, the measures required in compliance with the Construction Dust Control Ordinance and the Asbestos Airborne Toxic Control Measure would protect the workers themselves as well as members of the public located further away from the sources of fugitive dust that may also contain airborne asbestos. The project sponsor would be required to comply with the Construction Dust Control Ordinance and the Asbestos Airborne Toxic Control Measure, which would ensure that significant exposure to airborne asbestos would not occur.

Thus, prior to any construction activities, site mitigation, construction dust control, and asbestos dust mitigation plans that reflect current regulatory requirements and risk management protocols and that are in accord with health department and air district oversight would be developed. The site mitigation plan would include protocols for identifying, handling, and characterizing suspect contaminated soils, and on-site monitoring. As described in the initial study (p. 232) the site mitigation plan for the proposed project would evaluate and mitigate the presence of hazardous materials in soil and groundwater. Any soil found to be contaminated would be removed from the project site and transported to a regulated hazardous waste disposal site under the oversight of the health department. Under oversight of the public utilities commission, like all construction sites throughout the city that plan to conduct non-routine, episodic, batch, or other temporary discharges to the combined sewer system[10], contaminated groundwater from this construction site would be handled in accordance with the requirements of an approved batch wastewater discharge permit. As described in the initial study (pp. 228-237) the excavation and removal of contaminated soils would be conducted in accordance with the approved site mitigation plan and state occupational safety and health administration regulations to ensure construction worker

[9] California Air Resources Board, Final Regulation Order, Asbestos Airborne Toxic Control Measure for Construction, Grading, Quarrying, and Surface Mining Operations, https://www.arb.ca.gov/toxics/atcm/asb2atcm.htm, accessed September 24, 2018.

[10] Examples of such discharges include: de-watering of construction sites; de-watering of wells drilled to investigate or mitigate a suspected contaminated site; power-washing of buildings or parking lots; or any other activity that generates wastewater, other than from routine commercial or industrial processes.

safety, including on-site monitoring. Together with the site mitigation plan requirements for sampling, notification, handling and disposal of contaminated soils and building materials, hazard impacts on construction workers and, by extension, nearby residents, visitors, and workers located further from the potential sources of contamination would be less than significant, as concluded in the initial study. All removal or remediation work would be completed prior to occupancy of the rehabilitated and adaptively reused structure, and the site mitigation plan would include site caps if necessary to protect future site occupants and nearby residents, visitors, and workers.

Contaminated Building Materials

The buildings on the site were constructed during a period of time when lead-based paint, asbestos and polychlorinated biphenyls (PCBs) could be present in the building materials. Changes to the interior of existing office building as part of its adaptive reuse for the Laurel Heights campus of UCSF have been conducted in accordance with applicable regulations for removal of lead-based paint, asbestos, and PCBs.[11] Based on this information hazardous building materials in the existing office building may have been removed; however, demolition activities would adhere to all applicable regulations because the existing office and annex buildings may contain lead-based paint, PCBs and asbestos. Disruption of these materials could pose health threats for construction workers, occupants, and members of the public if they are not handled and disposed of properly. Federal, state, and local regulations address hazardous building materials to ensure that they are properly handled during disturbance, removal, and disposal prior to the start of building demolition or renovation.

Asbestos-Containing Building Materials

Asbestos may be found in building materials such as insulation, acoustical ceilings, and roofing tiles. People may be exposed to asbestos fibers suspended in the air during building demolition and alteration. Asbestos fibers can penetrate body tissues and remain in the lungs and the tissue lining of the lungs and abdominal cavity.

The following regulations apply to asbestos-containing building materials:

- **Asbestos National Emission Standards for Hazardous Air Pollutants (40 CFR Part 61, Subpart M)** specify asbestos-related work practices for demolitions and renovations of all structures, installations, and buildings, such as requiring the building owner to notify the appropriate state agency before any demolition or renovations that could contain a certain threshold amount of asbestos or asbestos-containing material, and requirements regarding removal of asbestos-containing waste.

[11] Langan Treadwell Rollo, Phase I Environmental Site Assessment for 3333 California Street, December 3, 2014, Appendix C, Phase 1 ESA-1997, pp. 8, 10, and 11.

- **Federal Asbestos General Standard (29 CFR 1910.100)**—addresses permissible exposure limits, engineering controls, worker training, labeling, respiratory protection, and disposal of asbestos waste. The Occupational Safety and Health Administration (OSHA) implements these regulations.
- **Federal Asbestos Construction Standard (29 CFR 1926.1101)** covers construction work involving asbestos, including work practices during demolition and renovation, worker training, disposal of asbestos waste, and specification of permissible exposure limits. OSHA) implements these regulations.
- **California Health and Safety Code Section 19827.5** requires that local agencies not issue demolition or alteration permits until an applicant has demonstrated compliance with notification requirements under applicable federal regulations regarding hazardous air pollutants, including asbestos. California regulates the licensing of asbestos abatement contractors and certification of asbestos consultants, defines asbestos as hazardous waste, and requires contractors to identify asbestos in their work area before starting to work and to comply with applicable regulations for asbestos-related work they perform.
- **Bay Area Air Quality Management District (BAAQMD) Regulation 11, Rule 2** regulates the demolition and renovation of buildings and structures that may contain asbestos. The air district must be notified at least 10 business days before any renovation involving the removal of 100 square feet or more, or 35 cubic feet or more of asbestos; and before every demolition regardless of asbestos content.
- **San Francisco Building Code** requires, prior to issuance of a demolition permit, a survey of regulated asbestos containing materials. If the survey indicates the presence of asbestos, the applicant must submit a Form 3/8 application completed by a licensed asbestos handling contractor, and special inspection asbestos cleanup letter prior to final inspection.

Lead-Based Paint

Lead was widely used in interior and exterior house paint until 1978, when new laws greatly reduced the amount of lead allowed. In general, as lead paint ages, it breaks down and may chalk or flake into small lead dust particles. These lead dust particles settle on surfaces in the home and the soil, and stay in the environment forever. Lead dust is a hazard to young children because they commonly explore their world through touch and taste, and unintentionally swallow lead dust. Lead is a poison that is especially harmful to young children and fetuses because of its effects on brain development. In San Francisco, most homes built before 1978 have older layers of lead-containing paint.

The following regulations apply to lead-based paint:

- **Federal Residential Lead-based Paint Hazard Reduction Act of 1992** provides grants and guidelines for elimination of lead-based hazards in federally assisted housing; makes recommendations on expanding resources and efforts to evaluate and reduce lead-based paint hazards in private housing; provides guidelines for lead-based paint hazard evaluation and reduction activities; requires disclosure of information concerning lead upon transfer of residential property; requires contractor training and certification;

authorizes states to develop programs; and promotes a comprehensive program to promote safe, effective, and affordable monitoring, detection, and abatement of lead-based paint and other lead exposure hazards.

- **California Health & Safety Code Section 105250** establishes a program to accredit lead-related construction training providers and to certify individuals to conduct lead-related construction activities.
- **California Labor Code Sections 6716 to 1717** provides for the establishment of standards that protect the health and safety of employees who engage in lead-related construction work, including construction, demolition, renovation, and repair.
- **San Francisco Building Code Section 3407** governs activities that disturb or remove painted surfaces on the exterior of any pre-1979 building and steel structures; and in the interior of any pre-1979 building that contains residential, hotel, and childcare use. The law requires safe work practices for all activities resulting in the disturbance or removal of lead-based paint; notification and posting of such work; and lead-safe work methods for any activity that disturbs paint. DBI's Lead Abatement Division enforces this code. This code lists required performance standards and prohibited work practices that the property owner and/or their contractors must follow when performing work that disturbs or removes lead-based paint, including maintenance, renovation or demolition activities.
- **San Francisco Health Code** Section 581 (b)(10) prohibits lead hazards. Section 1603(w) defines lead hazard as any condition that exposes children to lead.

Other Hazardous Building Materials

Fluorescent light ballasts can contain polychlorinated biphenyl (PCBs) or diethylhexyl phthalate (DEHP). PCBs have been prohibited in most uses since 1978, although some electrical transformers still in use today use oils that contain PCBs. The U.S. EPA has classified DEHP as a probable human carcinogen. Switches, thermostats, and fluorescent light tubes can contain mercury, which can harm the brain, kidneys, lungs, and immune systems of people. The following regulations address the abatement, removal, and disposal of these hazardous building materials:

- **Federal Toxic Substances Control Act of 1976** (U.S. Code, Title 15, Chapter 53 and 40 Code of Federal Regulations [CFR] 761) provides the EPA with authority to require reporting, record-keeping and testing requirements, and restrictions relating to chemical substances, and places special attention on PCBs, asbestos, lead, and mercury. As part of the TSCA, the EPA identified DEHP as a chemical requiring an action plan; DEHP is listed as a hazardous waste under federal regulations (40 CFR 261.33).
- **California Universal Waste Rule** (22 CCR 66261.9) identifies fluorescent tubes and bulbs and mercury-containing equipment, including thermostats and switches, as a hazardous waste and regulates its disposal (22 CCR 66261.50).

As noted in the initial study (pp. 233-235) mandatory compliance with existing laws and regulatory requirements would ensure that construction activities would not create a significant hazard to the public or the environment from the handling or disposal of hazardous building materials.

Conclusion

Following decommissioning and removal of hazardous materials and the move of all UCSF Laurel Heights uses to other campuses in San Francisco (e.g., Parnassus and Mission Bay), demolition, excavation and construction would be performed in accordance with the site mitigation, construction dust control, and asbestos dust mitigation plans that have been reviewed and approved by the responsible regulatory agencies. In addition to these plans, the project sponsor would also implement the Spill Prevention Control and Countermeasure Plan (see p. 232 of the initial study) as well as the required erosion control and stormwater pollution prevention plans (see pp. 175-176 of the initial study) to further ensure that hazardous materials used, handled, or disposed of during construction do not migrate off site in case of accident or upset (see Chapter 2, Project Description, pp. 2.105-2.108, for all anticipated approvals). The procedures for storage, handling, and disposal established by mandatory plan compliance are comprised of best management practices routinely used at construction sites for the safe and lawful handling of hazardous materials to prevent potentially harmful exposures to construction workers, the public, or the environment.

The majority of the potential hazardous materials impacts would be associated with demolition and site excavation, which would occur at the beginning of each phase of the proposed four-phase construction program. Public health and safety laws and regulations related to hazards and hazardous materials at all governmental levels, with state, regional, and local laws and regulations typically more stringent then federal ones, are applicable to the proposed project and project variant. Conformance with these laws and regulations, such as the implementation of site mitigation, construction dust control, and asbestos dust mitigation plans to manage contaminated soils and to control dust, are assumed as part of the project as they are legal requirements.

Thus, the recognized environmental conditions on the project site were disclosed; the regulatory processes for site mitigation, dust control (including naturally occurring asbestos), and other legally required preventative actions were identified, including the use of best management practices during construction; and the potential physical environmental effects were evaluated (see pp. 227-240 of the initial study). Therefore, as discussed in the initial study, hazards and hazardous materials impacts would be less than significant with the required adherence to all regulatory requirements, including disposal of contaminated groundwater in accordance with a public utilities commission issued batch wastewater discharge permit and compliance with detailed, site-specific plans under the jurisdiction of the health department and the BAAQMD.

OPERATION-RELATED HAZARDS

Site operation under the proposed development program (for either the proposed project or project variant) would not involve the use, production, storage, or disposal of hazardous materials beyond that which would be reasonably expected for residential, daycare, office, and parking uses. Thus, as described in the initial study (pp. 236-240), the proposed project would not create a significant hazard to the public or the environment through the routine use, transport, storage, and disposal of hazardous materials or through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

PUBLIC SERVICES (SCHOOLS ONLY)

This section corrects minor errors in the discussion of schools in the initial study's Public Services analysis as a result of updated information provided by the San Francisco Unified School District. The Schools section (Topic E.11, pp. 194-195 of the initial study [see EIR Appendix B]) is shown in its entirety for ease of reading.

Changes to the initial study text are shown below. Deleted text is shown with a ~~strikethrough~~ and additions are shown with double underline.

SCHOOLS

The project site is within the attendance area for Peabody Elementary School, located at 251 Sixth Avenue.[222] Other nearby public schools are the Lilienthal K-2 Elementary School Madison Campus (3950 Sacramento Street), Cobb Elementary School (2725 California Street), Roosevelt Middle School (460 Arguello Boulevard), and Wallenberg High School (40 Vega Street). There are both attendance area and citywide schools in the San Francisco Unified School District (school district, or district).[223] Starting at the elementary school level, students can choose between the two categories and list their preferred choices on the application. There are a number of tie-breakers used to help place students in a requested school when the number of requests for a school exceeds spaces available. At the elementary school level, these tie-breakers include older siblings already attending the preferred school, whether the student attended a school district's Pre K, the test score area in which the student resides, and the attendance area in which the student resides.

The school district maintains a property and building portfolio that has capacity for ~~over 90,000~~ almost 64,000 students.[224] A decade-long decline in district enrollment ended in the 2008-2009 school year at 52,066 students, and total enrollment in the district has increased to about 54,063 ~~55,613~~ in the 2017~~6~~-2018~~7~~ school year, an increase of approximately 1,997 ~~3,547~~ students since 2008.[225,226] In addition, approximately 4,283 students enrolled in charter schools are operated by other organizations but located in school district facilities.[226A] Thus, even with increasing enrollment, ~~school district facilities throughout the city are underutilized and~~ the district currently has more classrooms district-wide than needed.[227] However, the net effect of housing development across San Francisco is expected to increase enrollment by at least 7,000 students by 2030 and eventually enrollment is likely to exceed the capacity of current facilities.[227A] Lapkoff & Gobalet Demographic Research, Inc. conducted a study in 2010 for the school district that projected student enrollment through 2040, which is being updated as additional information becomes available. Their review considered several new and ongoing large-scale developments (Mission Bay, Candlestick Point, Hunters Point Shipyard/San Francisco Shipyard, and Treasure/Yerba Buena Islands, Parkmerced, and others) as well as planned housing units outside those areas.[228] The study developed student yield assumptions informed by historical yield, building type, unit size, unit price, ownership (rented or owner-occupied), whether units are subsidized, whether subsidized units are in standalone buildings or in inclusionary buildings, and other site specific factors. For most developments, the study establishes a student generation rate of 0.80 Kindergarten through 12th grade students per unit in a standalone affordable housing site, 0.25 students per unit for inclusionary affordable housing units, and 0.10 students per unit for market-rate housing.[229]

Implementation of the proposed project would result in the construction of up to 558 residential units and an anticipated population increase of about 1,261 residents (744 dwelling units and 1,681 residents under the project variant). Some of the new residents would consist of families with school-aged children who might attend school district schools~~, while others might attend private schools~~. The residential uses under both the proposed project and the project variant would ~~be inclusionary and~~ contain a percentage of on-site affordable housing units as required by Planning Code section 415, to be determined in coordination with the city. To conservatively analyze student generation rates and effects on schools, this analysis assumes both market rate and affordable units would generate 0.25 students per unit. Based on this rate, implementation of the proposed project would result in the generation of approximately 140 students (186 students under the project variant).

The proposed project and project variant would generate a direct incremental increase in the demand for school services. The school district ~~is~~ currently ~~not a growth district~~ has capacity in current facilities for more students. ~~and, as discussed above, most of its facilities throughout the city are generally underutilized.~~ Therefore, the district currently has adequate capacity for the new students generated by the proposed project or project variant.

The Leroy F. Greene School Facilities Act of 1998, or SB 50, restricts the ability of local agencies to deny land use approvals on the basis that public school facilities are inadequate. SB 50, however, permits the levying of developer fees to address local school facility needs resulting from new development. Local jurisdictions are precluded under state law from imposing school-enrollment-related mitigation beyond the school development fees. The San Francisco Unified School District collects these fees, which are used in conjunction with other school district funds, to support efforts to complete capital improvement projects within the city. The school impact fees to be collected for residential, commercial, and retail developments are currently set at $3.48 per square foot for new residential construction, $0.192 per square foot for hotel/motel, $0.388 per square foot for retail space, $0.54 per square foot for office space, and $0.536 per square foot for research and development.[229A] The proposed project or variant would be subject to the School Impact Fees.

Ultimately, given the San Francisco Unified School District's overall capacity of almost 64,000 students, the estimated increase of up to 186 students under the proposed project or variant would not substantially change the demand for schools on its own.[229B] Project-generated growth would be within the existing available capacity of the San Francisco Unified School District system. ~~Furthermore, the proposed project or project variant would be required to pay a school impact fee based on the construction of net new residential square footage to fund school district facilities and operations. For these~~

> ~~reasons~~ Therefore, implementation of the proposed project or project variant would not result in a substantial unmet demand for school facilities and would not require the construction of new, or alteration of existing, school facilities based on current enrollment. This impact would be less than significant, and no mitigation measures are necessary. ~~This topic will not be discussed in the EIR.~~

The footnotes in the Schools discussion have also been revised and new footnotes have been added. Changes are shown below, with deleted text ~~struck through~~ and additions double underlined. New footnotes are also designated by a number and a lowercased letter.

[222] San Francisco Unified School District, 201~~6~~7-201~~7~~8 School Location Map, ~~http://www.sfusd.edu/en/assets/sfusd-staff/enroll/files/2016-17/2016-17_schools_map.pdf~~ http://www.sfusd.edu/en/assets/sfusd-staff/enroll/files/2017-18/2017-18_schools_map.pdf, accessed ~~October 30, 2017~~ September 11, 2018.

[223] Attendance areas are geographic boundaries defining the service area of most elementary schools. Citywide schools include K-5 language immersion schools, K-8 schools, middle and high schools, and do not serve a particular geographic area.

[224] ~~San Francisco Unified School District, San Francisco Unified School District Capital Plan 2010-2019. pp. 24–25, http://www.sfusd.edu/en/assets/sfusd-staff/about-SFUSD/files/capital-plan-final-2010-2019.pdf, accessed January 8, 2018.~~ This analysis was informed, in part, by a Target Enrollment Survey the San Francisco Unified School District performed of all schools in 2010.

[225] San Francisco Unified School District, Facts at a Glance, 2018~~7~~, http://www.sfusd.edu/en/assets/sfusd-staff/about-SFUSD/files/sfusd-facts-at-a-glance.pdf, accessed September 13, 2018~~October 30, 2017~~.

[226] Enrollment summaries do not include charter schools.

[226A] CDE DataQuest enrollment queries for charter schools using SFUSD facilities, which include the following: City Arts and Tech High, Creative Arts Charter, Edison Charter Academy, Gateway High, Gateway Middle, KIPP Bayview Academy, KIPP San Francisco Bay Academy, KIPP College Preparatory, Leadership High and Mission Preparatory, https://dq.cde.ca.gov/dataquest/, accessed October 19, 2018.

[227] ~~San Francisco Unified School District, Capital Plan FY 2010-2019, September 2009, pp. 19-20, http://www.sfusd.edu/en/assets/sfusd-staff/about-SFUSD/files/capital-plan-final-2010-2019.pdf, accessed October 30, 2017.~~ San Francisco Unified School District, San Francisco Bay Area Planning and Urban Research (SPUR) Forum Presentation, Growing Population, Growing Schools, August 31, 2016, https://www.spur.org/sites/default/files/events_pdfs/SPUR%20Forum_August%2031%202016.pptx_.pdf, accessed October 5, 2018.

[227A] Lapkoff & Gobalet Demographic Research, Inc., Demographic Analyses and Enrollment Forecasts for the San Francisco Unified School District, February 16, 2018, p. 2, http://www.sfusd.edu/en/assets/sfusd-staff/about-SFUSD/files/demographic-analyses-enrollment-forecast.pdf, accessed October 5, 2018.

[228] Lapkoff & Gobalet Demographic Research, Inc., Demographic Analyses and Enrollment Forecasts for the San Francisco Unified School District, February 16, 2018 ~~November 23, 2015~~, p. 2, http://www.sfusd.edu/en/assets/sfusd-staff/about-SFUSD/files/demographic-analyses-enrollment-forecast.pdf, accessed September 13, 2018 ~~October 30, 2016~~.

[229] Lapkoff & Gobalet Demographic Research, Inc., Demographic Analyses and Enrollment Forecasts for the San Francisco Unified School District, p. 36~~3~~.

[229A] San Francisco Planning Department, San Francisco Citywide Development Impact Fee Register, Updated December 1, 2017, Effective January 1, 2018, http://forms.sfplanning.org/Impact_Fee_Schedule_2018.pdf, accessed on August 28, 2018.

[229B] San Francisco Unified School District, SPUR Forum Presentation, Growing Population, Growing Schools, August 31, 2016, Slide 14, August 31, 2016, https://www.spur.org/sites/default/files/events_pdfs/SPUR%20Forum_August%2031%202016.pptx_.pdf, accessed May 23, 2018.

MINERAL AND ENERGY RESOURCES

This section corrects minor errors in the April 12, 2018 energy assessment and calculations prepared pursuant to Appendix F: Energy Conservation of the California Environmental Quality Act (CEQA) Guidelines. Minor errors are related to an incorrect conversion factor “1 kBTU=3.412 kWh”. In addition, one of the underlying formulas in the attached spreadsheets did not include all cell values.

The energy assessment provides the basis for the discussion in Topic E.16: Mineral and Energy Resources of the initial study, pp. 242-245 (see EIR Appendix B). The updated numbers are not substantially different from those in the original assessment; thus, conclusions regarding the effects of the construction and operation energy usage do not change.

The initial study text changes below are shown in double underline and strikethrough.

> The third sentence in the paragraph under the “Construction” subsection on initial study p. 243 should read as follows:
>
> > “Electricity use associated with electric construction equipment for the proposed project or the project variant would add an additional ~~6,000,000~~ 7,170,000 kWh.”
>
> Footnote 318 on p. 243 should read as follows:
>
> > “[318] 1 ~~kBTU~~ kWh = 3.412 ~~kWh~~ kBTU and 1 kBTU = 3.412 kWh
>
> The first full paragraph on p. 244 should read as follows:
>
> > “On-site generation is not included in the above building energy use estimates and would further reduce regional energy demand associated with the proposed project or project variant. During operation, the estimated renewable energy output would be ~~1,315,626~~ 1,314,666 kWh/year for solar photovoltaic systems and 2,084 MMBTU/year (610,786 kWh/year) for solar hot water heaters. The roof area that would be allocated to solar equipment would be the same under the proposed project or project variant; therefore, the estimated renewable energy production for the proposed project and project variant would be the same.”

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5. OTHER CEQA CONSIDERATIONS

Chapter 5, Other CEQA Considerations, discusses growth-inducing impacts, significant unavoidable impacts, significant irreversible impacts, and areas of known controversy related to the proposed project and project variant.

A. GROWTH-INDUCING IMPACTS

As required by section 15126.2(d) of the California Environmental Quality Act (CEQA) Guidelines, an environmental impact report (EIR) must consider the ways in which a proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Growth-inducing impacts can result from the elimination of obstacles to population growth, such as a major expansion of a wastewater treatment plant, or through economic growth that would, in turn, generate increased employment or demand for housing and public services.

Although the project site is not in a priority development area as designated by the Association of Bay Area Governments (ABAG), the proposed project or project variant would be consistent with San Francisco General Plan and Housing Element goals and policies, and ABAG priority development area goals and criteria; i.e., it is located on an infill site, is served by existing transit, and is in an area containing a mix of moderate density housing, services, retail, employment, and civic or cultural uses.[1] The proposed project conforms to densities allowed in the project site's zoning district and the project variant would conform with allowable densities under the San Francisco Planning Code (planning code) through the planned unit development process. As evaluated in the initial study (presented in EIR Appendix B), including Topics E.9, Recreation; E.10, Utilities and Service Systems; and E.11, Public Services, the proposed project or project variant would not require the expansion of roads, infrastructure, or public services that would accommodate additional increased development opportunities offsite that could cause additional off-site physical changes to the environment.

As stated under Impact PH-1, initial study p. 114, the proposed project and project variant would add approximately 1,261 and 1,681 new residents to the project site, respectively. The Association of Bay Area Governments, in *Projections 2013*, projected that the citywide population would be 890,400 in 2020, and that the citywide increase in population between 2020 and 2040 is anticipated to be about 195,300 persons.[2] As described on initial study p. 116, the population increase attributable to the proposed project and project variant would represent about 0.6 and 0.9 percent, respectively, of the projected growth between 2020 and 2040; therefore, the

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[1] ABAG, *Projections 2013,* pp. 6-7; ABAG, *Plan Bay Area 2040*, pp. 28-29.

[2] Association of Bay Area Governments (ABAG), *Projections 2013*, p. 75. ABAG's projected residential population for San Francisco is 890,400 persons in 2020 and 1,085,700 persons in 2040.

proposed project and project variant would not make up a substantial portion of citywide growth and the population increase would be accommodated within planned growth.

The population of census tracts within a quarter-mile radius of the project site is approximately 25,866 persons.[3] As described on initial study p. 116, the proposed project or project variant would increase the residential population near the project site (census tracts within a quarter-mile radius of the project site) by approximately 4.9 or 6.5 percent, respectively. When compared to existing conditions, the proposed project or project variant would create a noticeable increase in the local population. However, this population growth would not be substantial or unplanned, as no expansion of roads, infrastructure,[4,5] or public services would be needed to accommodate the project-related population.

As stated Impact PH-1, initial study p. 114, the proposed project or project variant would add approximately 395 or 206 new employees to the project site, respectively. The proposed project and project variant each would result in a decrease in the onsite employee population compared to existing conditions; however, the new office use in the proposed project would be staffed by new employees and the existing UCSF employees and jobs would be moved to another UCSF campus within the City. San Francisco's employment base in 2020 is projected to be 671,230 jobs, with an increase of approximately 88,270 jobs by 2040.[6] As discussed on initial study p. 117, the project-related employment would represent considerably less than 1 percent (0.45 percent under the proposed project and 0.23 percent under the project variant) of the City's estimated job growth between the years 2020 and 2040. This estimated change in employment would be negligible in the context of total jobs in San Francisco, and would not exceed projected employment growth. Although some of the new employees on the project site may already be employed in the City, and, as a result, would not contribute to an increase in housing demand within the City, this analysis does not assume that to be the case.

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[3] U.S. Census Bureau, 2012-2016 5-Year American Community Survey, San Francisco County and Census Tracts 133, 134, 153, 154, and 157, American Community Survey Demographic and Housing Estimates, https://factfinder.census.gov/faces/nav/jsf/pages/index.xhtml, accessed January 4, 2018.

[4] The proposed project or project variant would include the construction of an approximately 8-inch-diameter, 180-foot-long sewer line extension under Masonic Avenue to serve the project demand from the Masonic Building. This sewer line extension would be sized to serve project demands and would not result in additional service capacity such that adjacent developed parcels could be more intensely developed.

[5] The proposed project or project variant would include the construction of new natural gas lines under Euclid Avenue between Laurel Street and Masonic Avenue (approximately 350 feet), under Masonic Avenue between Euclid and Presidio avenues (approximately 625 feet), and under Presidio Avenue (approximately 75 feet) at the intersection of Presidio Avenue/Masonic Avenue/Pine Street. The proposed extensions would connect to PG&E's existing natural gas infrastructure under Presidio Avenue, California Street and Laurel Street to form a loop around the project site. This natural gas line loop would not result in additional service capacity such that adjacent developed parcels could be more intensely developed.

[6] ABAG, *Projections 2013*, p. 75.

According to ABAG's *Projections 2013*, San Francisco is projected to have an estimated 1.32 workers per household.[7] As discussed on initial study p. 118, the proposed project's or project variant's employees would generate a potential demand for about 299 or 156 new residential units, respectively, if all these employees relocated to San Francisco and required new housing. Projections 2013 estimates indicate that there will be approximately 379,600 households in San Francisco in 2020, with an increase of approximately 67,750 households between 2020 and 2040. The proposed project's or project variant's employment-related housing demand would represent 0.4 percent or 0.2 percent, respectively, of the City's estimated household growth over this 20-year time period. Therefore, employee-generated housing demand under the proposed project or project variant would not be substantial. Furthermore, the new housing that would be developed with the proposed project or project variant would contribute new units to the City's housing stock and could potentially accommodate some of the new employment-related housing demand.

In summary, the increase in the number of residents and employees on the project site would not result in a substantial or unplanned increase in the population of the project vicinity or the City. Furthermore, the proposed project and project variant would not result in the extension of infrastructure into undeveloped areas; the extension of infrastructure systems beyond what is needed to serve project-specific demand; construction of a residential project in an area that is undeveloped or sparsely developed; or removal of obstacles to population growth (such as provision of major new public services to an area where those services are not currently available).

B. SIGNIFICANT UNAVOIDABLE IMPACTS

In accordance with section 21100 (b)(2)(A) of CEQA and with sections 15126(b) and 15126.2(b) of the CEQA Guidelines, the purpose of this section is to identify significant environmental impacts that could not be eliminated or reduced to less-than-significant levels by implementation of mitigation measures.

The proposed project or project variant would result in significant and unavoidable project-level impacts described below.

HISTORIC ARCHITECTURAL RESOURCES

As identified in Section 4.B, Historic Architectural Resources, under Impact CR-1, p. 4.B.41, partial demolition of the Midcentury Modern-designed corporate campus at 3333 California Street under the proposed project or project variant would result in a significant and unavoidable impact. The campus is eligible for inclusion in the California Register of Historical Resources at

[7] ABAG, *Projections 2013*, pp. 74 and 75.

the local level of significance as an individual property under Criterion A/1 (Events) and Criterion C/3 (Architecture, Design, Construction) and is considered a historic resource under CEQA. Implementation of Mitigation Measures M-CR-1a: Documentation of Historical Resource and M-CR-1b: Interpretation of the Historical Resource, pp. 4.B.45-4.B.46, would lessen the impact of the proposed project or project variant; however, these mitigation measures would not reduce this impact to a less-than-significant level. Therefore, this impact would be considered significant and unavoidable.

Chapter 6, Alternatives, presents a range of alternatives that would meet most of the project objectives and could avoid or substantially lessen significant impacts of the partial demolition and site redevelopment under the proposed project or project variant. The chapter includes alternatives that would retain, in whole or in part, existing elements of the project site.

TRANSPORTATION AND CIRCULATION

The proposed project or project variant would result in a significant impact by increasing ridership to exceed 85 percent capacity utilization and contributing more than 5 percent on one individual Muni route (43 Masonic) during the weekday a.m. peak hour under baseline conditions, as described under Impact TR-4, p. 4.C.83. Muni's 43 Masonic route currently operates at 84 percent of its weekday a.m. peak hour transit capacity (see Section 4.C, p. 4.C.12). The project-related increase in transit demand could not be accommodated by adjacent transit capacity, given the 43 Masonic is the only transit route within one half of a mile that serves northbound destinations from the project site. Therefore, the proposed project or project variant would have a significant impact on an individual Muni route. Implementing transit route improvements, as identified in Mitigation Measure M-TR-4: Monitor and Provide Fair-Share Contribution to Improve 43 Masonic Capacity, pp. 4.C.87-4.C.88, is expected to allow Muni to maintain transit headways, and would reduce the proposed project's or project variant's impact on the 43 Masonic to a less-than-significant level. However, because the options for providing additional service and SFMTA's ability to implement improvements are uncertain, the proposed project's or project variant's impact would be considered significant and unavoidable with mitigation.

NOISE

As discussed in Section 4.D, Noise and Vibration, under Impact NO-1, p. 4.D.36, construction of the proposed project or project variant would expose people to or generate noise levels in excess of applicable standards or cause a substantial temporary or periodic increase in ambient noise levels. Implementation of construction noise control measures in Mitigation Measure M-NO-1: Construction Noise Control Measures, pp. 4.D.42-4.D.43, would reduce the proposed project's or project variant's temporary or periodic increases in ambient noise levels to the maximum extent feasible. However, these construction measures would not necessarily reduce noise increases at the sensitive residential land uses on the south side of Euclid Avenue, the west side of Laurel Street, and the north side of California Street to below the +10 dBA threshold over ambient conditions during particular construction activities that would generate high levels of noise (i.e., excavation with an excavator with a hoe ram in Phase 1, general excavation in Phases 1, 3, and 4, and building construction activities in Phases 1 and 4). On-site receptors would be subject to noise impacts by construction activities during subsequent phases. Although construction-related impacts are typically considered temporary, the impacts on offsite and onsite sensitive receptors would be a substantial temporary increase and significant because noise increase would represent a 10-dBA increase over ambient noise levels (or a doubling of the existing noise levels) and would persist due to the extended duration of the four-phase construction program. This would result in a significant and unavoidable impact.

C. SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

In accordance with section 21100(b)(2)(B) of CEQA, and section 15126.2(c) of the CEQA Guidelines, an EIR must identify any significant irreversible environmental changes that could result from implementation of the proposed project (or project variant). This may include uses of non-renewable resources during the initial and continued phases of a project that may be irreversible as a large commitment of resources makes removal or non-use thereafter unlikely, and secondary impacts that commit future generations to similar uses. Also irreversible damage can result from environmental accidents associated with a project. According to the CEQA Guidelines, irretrievable commitments of resources should be evaluated to ensure that such current consumption is justified.

The project site is currently an urban site developed with two buildings, several surface parking lots, landscaping and landscaped areas that would be redeveloped as a new residential mixed-use project with publicly-accessible open space. As such, no irreversible environmental changes, such as those that might result from construction of a large-scale mining project, hydroelectric dam, or other industrial project that specifically alters non-renewable resources would result from development of the proposed project or project variant.

No significant irreversible environmental damage related to environmental accidents is anticipated to occur with implementation of the proposed project or project variant (see Topic E.15, Hazards and Hazardous Materials, of the initial study). Compliance with federal, state, and local regulations related to the handling, transport, and disposal of hazardous materials during demolition, construction and operation, as well as the limited hazardous materials associated with residential and commercial uses, would reduce the potential for the proposed project or project variant to cause significant irreversible environmental damage.

Consumption of nonrenewable resources includes increased energy consumption, conversion of agricultural lands to urban uses, and loss of access to mineral reserves. No agricultural lands would be converted and no access to mining reserves would be lost with construction of the proposed project or project variant.

Resources consumed during construction would include lumber, concrete, gravel, asphalt, masonry, metals, and water. Similar to the existing uses on the project site, the proposed project or project variant would irreversibly use water and solid waste landfill resources. However, the proposed project or project variant would not involve a large commitment of resources relative to existing conditions or supply, nor would it consume any of those resources wastefully.

Operation of the proposed project or project variant would require the use of energy, including energy produced from nonrenewable fossil fuels. In California, energy consumption in buildings is regulated by Title 24 of the California Code of Regulations. Title 24 includes standards that regulate energy consumption for the heating, cooling, ventilation, and lighting of residential and nonresidential buildings. In San Francisco, documentation demonstrating compliance with Title 24 standards is required to be submitted with a building permit application. Compliance with Title 24 standards is enforced by the San Francisco Department of Building Inspection. The proposed project or project variant is an infill development that would include new construction and the adaptive reuse of an existing onsite building. The proposed project or project variant would be required to comply with the standards of Title 24 and the requirements of the 2016 San Francisco Green Building Ordinance. Because the proposed project or project variant would be required to meet or exceed the energy conservation requirements in the San Francisco Green Building Ordinance, which itself includes energy conservation requirements that exceed those in the California Building Code, energy would not be used in a wasteful, inefficient, or unnecessary manner.

Operation-related energy consumption would include electricity and natural gas, as well as vehicle fuel used by residents, employees, and visitors as expressed through vehicle miles traveled. Electricity and natural gas would be used for building space heating and lighting (uses that are covered by Title 24, discussed above) as well as for operation of equipment and machines.

Energy conservation design features to meet state and local goals for energy efficiency and renewable energy have been incorporated into the project design to reduce wasteful, inefficient, and unnecessary consumption of energy during construction and operation. The proposed project or project variant would be built to Leadership in Energy and Environmental Design for Neighborhood Development certification at a minimum Gold Standard, thus minimizing the amount of fuel, water, or energy used. Rooftops of the proposed new buildings and the adaptively reused office building would be developed with a mix of green roofs, solar photovoltaic systems, and/or roof-mounted solar hot water systems. The proposed project or project variant would also incorporate transportation demand management measures into its design, such as carshare parking and bicycle parking and repair stations, that would help to minimize the amount of transportation fuel consumed. Further, the project sponsor would be required to develop and/or reserve up to 8 percent of parking spaces for electric vehicles, which would also minimize the amount of transportation fuel consumed.

The proposed project or project variant would introduce new residential and commercial uses to the project site. As discussed in the initial study under Topic E.10, Utilities and Service Systems, p. 173, the project site is within an urban area that is served by water storage, treatment, and distribution facilities; combined wastewater and stormwater collection, storage, treatment and disposal facilities; and solid waste collection and disposal service systems. The proposed project or project variant would use best-practice water conservation devices and techniques. On June 13, 2017, the San Francisco Public Utilities Commission approved a water supply assessment for the proposed project and project variant and determined that adequate water supplies are available to meet project demand. Because the water demand estimated for the proposed project or project variant could be accommodated by the existing and planned supply anticipated under the commission's 2015 *Urban Water Management Plan*, it would not result in a substantial increase in water use on the project site such that existing water supply entitlements and water resources would need to be expanded. Furthermore, the project sponsor and general contractor would minimize the use of potable water during construction to the extent feasible, and would comply with Ordinance 175-91, which requires that non-potable water be used for dust-control activities when feasible. The proposed project or project variant would not involve the wasteful, inefficient, or unnecessary consumption of water resources.

D. AREAS OF KNOWN CONTROVERSY AND ISSUES TO BE RESOLVED

Chapter 1, Introduction, describes the public review process and summarizes the comments received on the Notice of Preparation (NOP) of an Environmental Impact Report as well as those received on the initial study issued separately. During the NOP review and comment period, a total of 54 comment letters, comment cards, and emails were submitted to the planning department and 28 speakers provided oral comments at the public scoping meeting. In addition, following publication of the initial study, a total of 15 additional comment letters and emails were submitted to the planning department.

Based on the number of comments received, the most evident controversial issues for the proposed project or project variant, as expressed by community members, include the following:

- Loss of neighborhood character
- The duration of the construction period as a burden on the community
- The loss of open green space
- The loss of existing mature on-site trees
- The loss of available on-street and off-street parking supply

- Proposed building heights above existing height limits
- The inclusion of commercial uses in development of the project site, with strong neighborhood support expressed for study of a code-conforming all-residential alternative
- The use of transportation network companies (for-hire vehicles) by residents, employees, and visitors to the site

6. ALTERNATIVES

A. INTRODUCTION

Chapter 6, Alternatives, presents the alternatives analysis for the 3333 California Street Mixed-Use Project, as required by the California Environmental Quality Act (CEQA). This chapter describes the scoping process used to develop a reasonable range of potentially feasible alternatives to the proposed project or project variant that attain most of the basic project objectives and could avoid or substantially lessen the significant impacts identified in this EIR (CEQA Guidelines section 15126.6(a)). It identifies the required "no project" alternative among the range of alternatives analyzed (CEQA Guidelines section 15126.6(e)). It contrasts the characteristics and impacts of the alternatives with those of the proposed project or project variant, and evaluates the comparative merits of the alternatives and the ability of each alternative to meet most of the basic project objectives. This chapter also identifies the environmentally superior alternative based on the impact analysis. The chapter concludes with a discussion of alternatives that were considered but eliminated from detailed consideration, along with the reasons for their elimination (CEQA Guidelines section 15126.6(c)).

Six alternatives are evaluated: a No Project Alternative (Alternative A), four preservation alternatives (Alternative B: Full Preservation – Office Alternative; Alternative C: Full Preservation – Residential Alternative; Alternative D: Partial Preservation – Office Alternative; and Alternative E: Partial Preservation – Residential Alternative), and a Code Conforming Alternative (Alternative F). See Table 6.1: Comparison of Characteristics of the Proposed Project, Project Variant, and EIR Alternatives, pp. 6.13-6.15, for a comparison of the main characteristics of the proposed project, project variant, and alternatives. Table 6.1 presents an overview of the characteristics of the alternatives compared to those of the proposed project and project variant; please refer to the more detailed discussion of each alternative in the sections below. The travel demand and parking rates for each of the alternatives are presented in Table 6.2: Comparison of Person-Trip and Vehicle-Trip Generation Estimates by Mode – External Trips, and Parking Rate Summary for the Proposed Project, Project Variant, and EIR Alternatives, p. 6.16.

CEQA REQUIREMENTS FOR ALTERNATIVES ANALYSIS

CEQA Guidelines section 15126.6(a) requires that an EIR evaluate "a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives." An EIR need not consider every conceivable alternative to a proposed project. Rather, it must consider a range of potentially feasible alternatives governed by the "rule of reason" in order to foster informed decision-making and public participation (CEQA Guidelines section 15126.6(f)).

CEQA Guidelines sections 15126.6(f)(1) and (f)(3) state that "among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries (projects with a regionally significant impact should consider the regional context), and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent)." The CEQA Guidelines also state that an EIR "need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative." The final determination of feasibility will be made by City decision-makers based on substantial evidence in the record, which includes, but is not limited to, information presented in the EIR, comments received on the Draft EIR, and responses to those comments.

PROJECT OBJECTIVES

As discussed in Chapter 2, Project Description, p. 2.12, the project sponsor has identified ten basic project objectives, listed below. As noted on p. 6.1, an EIR need only consider alternatives that would feasibly accomplish most of the project's basic objectives.

1. Redevelop a large underutilized commercial site into a new high quality walkable mixed-use community with a mix of compatible uses including residences, neighborhood-serving ground floor retail, on-site child care, potential office/commercial uses, and substantial open space.
2. Create a mixed-use project that encourages walkability and convenience by providing residential uses, neighborhood-serving retail, on-site child care, and potential office/commercial uses on site.
3. Address the City's housing goals by building new residential dwelling units on the site, including on-site affordable units, in an economically feasible project consistent with the City's General Plan Housing Element and the Association of Bay Area Government's Regional Housing Needs Allocation for the City and County of San Francisco.
4. Open and connect the site to the surrounding community by extending the neighborhood urban pattern and surrounding street grid into the site through a series of pedestrian and bicycle pathways and open spaces, including a north-south connection from California Street to Euclid Avenue that aligns with Walnut Street and an east-west connection from Laurel Street to Presidio Avenue.
5. Create complementary designs and uses that are compatible with the surrounding neighborhoods by continuing active ground floor retail uses along California Street east from the Laurel Village Shopping Center, adding to the mix of uses and businesses in the area, and providing activated, neighborhood-friendly spaces along the Presidio, Masonic and Euclid avenue edges compatible with the existing multi-family development to the south and east.
6. Provide a high quality and varied architectural and landscape design that is compatible with its diverse surrounding context, and utilizes the site's topography and other unique characteristics.

7. Provide substantial open space for project residents and surrounding community members by creating a green, welcoming, walkable environment that will encourage the use of the outdoors and community interaction.
8. Incorporate open space in an amount equal to or greater than that required under the current zoning, in multiple, varied types designed to maximize pedestrian accessibility and ease of use.
9. Include sufficient off-street parking for residential and commercial uses in below-grade parking garages to meet the project's needs.
10. Work to retain and integrate the existing office building into the development to promote sustainability and eco-friendly infill re-development.

The ability of each alternative to achieve the basic project objectives is discussed briefly at the end of the description of each alternative. See Table 6.3: Ability of Alternatives to Meet Basic Project Objectives, pp. 6.17-6.19, for a summary comparison of the ability of each alternative to achieve the basic project objectives.

SUMMARY OF SIGNIFICANT IMPACTS

As stated in CEQA Guidelines section 15126.6(a), project alternatives must avoid or reduce significant impacts of the proposed project. The significant impacts of the proposed project or project variant identified in Chapter 4, Environmental Setting and Impacts, and in the initial study (EIR Appendix B) are summarized below. (See Table 6.4: Comparison of Significant Impacts of the Proposed Project, Project Variant, and EIR Alternatives, pp. 6.21-6.22, for a comparison of the significant impacts of the proposed project and project variant to those of the alternatives, as well as the comparative effects amongst the alternatives.)

Significant and Unavoidable Impacts

As identified in Chapter 4, the proposed project or project variant would result in significant and unavoidable impacts in the following topic areas:

- Historic Architectural Resources (Impact CR-1 [substantial change in the significance of a historic resource due to demolition of a historic structure and associated site and landscape features and new construction] on pp. 4.B.41-4.B.47)
- Transportation and Circulation (Impact TR-4 [transit capacity exceedance on Muni 43 Masonic route during the weekday a.m. peak period] on pp. 4.C.83-4.C.87)
- Noise and Vibration (Impact NO-1 [construction noise events in excess of applicable standards at noise-sensitive receptors along Euclid Avenue, Laurel Street, and California Street] on pp. 4.D.36-4.D.51)

Implementation of Mitigation Measures M-CR-1a: Documentation of Historical Resource and M-CR-1b: Interpretation of the Historical Resource, p. 4.B.46, would not reduce the impact on the historic resource to a less-than-significant level. Thus, this impact would remain significant and unavoidable.

Mitigation Measure M-TR-4: Monitor and Provide Fair Share Contribution to Improve 43 Masonic Capacity, pp. 4.C.87-4.C.88, would reduce the impact to less-than-significant levels; however, the options for providing additional capacity and the SFMTA's ability to implement improvements are not certain. Thus, this transit capacity impact would remain significant and unavoidable after mitigation.

Mitigation Measure M-NO-1: Construction Noise Control Measures, pp. 4.D.42-4.D.43, would reduce the substantial temporary or periodic increase in ambient noise levels during construction; however, the required reductions from the highest estimated noise levels (i.e., those that result in a 10 dBA or greater increase above ambient levels for construction noise events such as rock fragmentation) may not be achieved. Thus, after implementation of the noise control measures, the impact would remain significant and unavoidable.

Significant Impacts Identified in the EIR and Initial Study

Chapter 4 describes the proposed project's and project variant's significant impacts that could be mitigated to less-than-significant levels with implementation of mitigation measures. Without mitigation measures, significant impacts would occur in the following topic areas:

- Transportation and Circulation (Impact TR-2 [vehicle miles traveled, or VMT, impact due to proposed provision of parking at a rate greater than that in the neighborhood for retail uses] on pp. 4.C.74-4.C.81)
- Noise and Vibration (Impact NO-2 [groundborne vibration impacts on adjacent SF Fire Credit Union building] and Impact NO-3 [siting of rooftop mechanical equipment and operational noise impacts on onsite receptors] on pp. 4.D.51-4.D.62)

Mitigation Measure M-TR-2: Reduce Retail Parking Supply (p. 4.C.80) would reduce the amount of parking provided for the retail uses to more closely match the existing neighborhood parking rate so that the project-related VMT impact would be reduced to a less-than-significant level.

Mitigation Measure M-NO-2: Vibration Monitoring Program for SF Fire Credit Union Building (pp. 4.D.55-4.D.56) would implement a vibration monitoring program developed by a qualified structural engineer or vibration consultant that includes vibration control measures to reduce the vibratory impacts of excavators and/or vibratory rollers when operating as close as 5 feet from the adjacent SF Fire Credit Union building to less-than-significant levels. Mitigation Measure M-NO-3: Stationary Equipment Noise Controls (p. 4.D.60) would reduce the operational noise impacts of rooftop mechanical equipment to less-than-significant levels by implementing noise control measures such as siting mechanical rooms away from the building edge, and using sound enclosures and noise barriers like roof parapets.

As described in the initial study, without mitigation, the proposed project or project variant would result in significant impacts in the following topic areas:

- Topic E.3, Cultural Resources (archaeological resources, human remains and tribal cultural resources [Impacts CR-2, CR-3, CR-4, and C-CR-1 on initial study pp. 125-136])
- Topic E.12, Biological Resources (nesting birds [Impact BI-1 on initial study pp. 200-201 and Impact C-BI-1 on initial study p. 204])
- Topic E.13, Geology and Soils (paleontological resources [Impact GE-5 on initial study pp. 212-215])

Implementation of Mitigation Measures M-CR-2a: Archaeological Testing, Monitoring, Data Recovery and Reporting; M-CR-2b: Interpretation, pp. 129-133, and M-CR-4: Tribal Cultural Resources Interpretive Program, p. 135, would reduce the impacts on archaeological cultural resources to less-than-significant levels.

Mitigation Measure M-BI-1: Preconstruction Nesting Bird Survey and Buffer Area, pp. 200-201, would schedule construction activities to occur during periods outside of the nesting period, to the maximum extent feasible; initiate preconstruction surveys prior to the onset of construction for each phase of the four-phase construction program, in order to establish buffer zones around any active nests; and implement monitoring, as necessary. Implementation of this measure would reduce impacts on nesting birds to less-than-significant levels.

Mitigation Measure M-GE-5: Inadvertent Discovery of Paleontological Resources, pp. 214-215, would require that a qualified paleontologist conduct record and literature research and train construction personnel in the identification and proper handling of fossils, if encountered, during any earthmoving activities. Implementation of this measure would reduce impacts related to the inadvertent discovery of a paleontological resource to a less-than-significant level.

ALTERNATIVES SCOPING PROCESS

As discussed on p. 6.1, alternatives selected for CEQA analysis must meet the following criteria: (1) they must attain most of the basic project objectives; (2) they must avoid or reduce any of the significant environmental impacts of the proposed project or project variant; and (3) they must be potentially feasible. The selected alternatives must also foster informed decision-making and public participation. As stated in CEQA Guidelines section 15126.6(f)(1), factors that may be considered when a lead agency is assessing the feasibility of alternatives include:

> site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries (projects with a regionally significant impact should consider the regional context), and whether the proponent can reasonably acquire, control, or otherwise have access to the alternative site (or the site is already owned by the proponent).

The scoping process for identifying viable EIR alternatives focused primarily on the development of alternatives that address the proposed project's and project variant's significant and unavoidable impacts. Impacts determined to be less than significant with mitigation were also considered in the scoping process but were not weighted as heavily because feasible and effective mitigation measures have been identified for avoiding or substantially reducing those impacts.

Development of the alternatives focused on preservation alternatives that could avoid or substantially lessen the substantial adverse change in the site's historical significance as a Midcentury Modern designed corporate campus. Therefore, the EIR includes alternatives that would fully preserve the historic resource as well as partial preservation alternatives. The significant and unavoidable transportation and noise impacts were also considered, with the underlying strategy for addressing both impacts being a reduced development alternative.

PRESERVATION ALTERNATIVES

The preservation staff of the San Francisco Planning Department (planning department), with assistance from the project sponsor and their preservation architectural specialists (Page & Turnbull), outlined various approaches to the retention of the character-defining features of the property in the development of preservation alternatives and ultimately settled on one full and two partial preservation alternatives in addition to the required no project alternative. The three preservation alternatives plus the no project alternative were included in a Preservation Alternatives Report prepared by Page & Turnbull and presented to the Architectural Review Committee (ARC) of the Historic Preservation Commission (HPC).[1] The report was prepared with guidance and direction of the planning department pursuant to HPC Resolution No. 0746.[2]

Multiple preservation alternatives were explored to determine if the significant impact of the partial demolition of the existing office building and new construction on the site's historic resource could be avoided or reduced. The preservation alternatives presented in the report reflect consideration of the character-defining features of the existing building and those of the site and landscape as identified in the planning department's Preservation Team Review Form.[3,4] This set of alternatives represented increasing development intensities for changes to the building and site

1 Page & Turnbull, Revised Draft 3333 California Preservation Alternatives Report and Graphics Package, prepared for Laurel Height Partners, LLC, March 2, 2018.

2 HPC Resolution No. 0746 (approved March 15, 2015) clarifies expectations for the evaluation of significant impacts to historic resources and the preparation of preservation alternatives in a Draft EIR.

3 Justin Greving, Preservation Planner, San Francisco Planning Department, *Preservation Team Review Form, Case No. 2015-014028ENV, 3333 California Street*, January 11, 2018. The Preservation Team Review Form was later superseded by the Planning Department's Historic Resource Evaluation Response (Part 1), dated May 7, 2018.

4 See Table 4.B.1, p. 4.B.21, in Section 4.B, Historic Architectural Resources, for the final list of character-defining features as identified in the planning department's Historic Resource Evaluation Response (see EIR Appendix C-4, *Historic Resource Evaluation Response (Part 1), Case No. 2015-014028ENV, 3333 California Street*, May 14, 2018).

including the continuation and expansion of the office use and new construction of residential buildings on the open area and surface parking lots that surround the building. The planning department acknowledged in the staff report to the ARC that the alternatives could adaptively reuse the existing building for residential use with differences limited to exterior alterations to the glass curtain wall system and other limited code-related changes necessary for residential use.

Architectural Review Committee of the Historic Preservation Commission

The planning department presented these preservation alternatives to the ARC on March 21, 2018, to solicit their early input on the development of CEQA-related, preservation-focused alternatives. The staff report included the Historic Resources Evaluation prepared by LSA, the planning department's Preservation Team Review Form, the Preservation Alternatives Report, and the draft National Register Nomination Form prepared by Michael Corbett and Denise Bradley.[5,6] The ARC opined that the treatment of the character-defining features in preservation alternatives required further refinements based on the relative importance of views of the property from public vantage points along the perimeter streets (especially from Masonic and Euclid avenues and Presidio Avenue/Pine Street) and the reduced residential component of the land use programs.[7] Revisions suggested by the ARC included the following:

- New construction should be focused on the northern and western portions of the site to balance preservation of the building and landscape, but with new building footprints and shapes sculpted to minimize impacts on particular features of the designed landscape that provide opportunity for their reconstruction, e.g., curvilinear pathways, courtyards, and mature trees.
- Additional height on new buildings along California Street could be added without a substantial effect on the character-defining features of the site because these features are not as discernible from vantage points along California Street.

The full and partial preservation alternatives presented to the ARC were subsequently refined in response to ARC input, and formed the basis for Alternative C, Alternative D, and Alternative E analyzed in this chapter. An additional full preservation alternative (Alternative B) was included in response to expert opinion presented in the National Register Nomination Form. As discussed on pp. 4.B.22 and 4.B.25 in Section 4.B, Historic Architectural Resources, the planning

5 San Francisco Planning Department, Staff Report for Architectural Review Committee of the Historic Preservation Commission re: Review and Comment for 3333 California Street Preservation Alternatives for Draft EIR, Case No. 2015-014028ENV, March 21, 2018.

6 Michael Corbett (Architectural Historian) and Denise Bradley (Landscape Historian), Draft National Register of Historic Places Registration Form for Fireman's Fund Insurance Company Office at 3333 California Street, San Francisco, California, prepared for the Laurel Heights Improvement Association, prepared February 5, 2018 and submitted to California State Historic Preservation Office on February 9, 2018.

7 San Francisco Planning Department, Meeting Summary for Architectural Review Committee of the Historic Preservation Commission re: Review and Comment for 3333 California Street Preservation Alternatives for Draft EIR, Case No. 2015-014028ENV, April 5, 2018.

department made minor revisions to its assessment in a Historic Resource Evaluation Response after consideration of the expert opinions expressed in the National Register Nomination form.[8] There were no changes to the list of the character-defining features identified in the planning department's initial assessment.

Factors of particular consideration in preserving the character-defining features of the property highlighted by the ARC in their recommendation to revise the preservation alternatives presented to them on March 21, 2018 included the following:

- Limit changes to the existing building (including additions) but explore conversion of office use to residential use to better meet one of the basic project objectives;
- Preserve character-defining site and landscape features that provide the site with its historically open corporate campus feel with greater development focus on the northern portion of the site to allow the southern portion of the site to remain free of development;
- Balance the retention of the character-defining features of the building and those of the site and designed landscape with emphasis on the retention of views of the southern portion of the site to better convey the integral relationship between the character-defining features of the building, the site, and the designed landscape;
- Preserve views of the site that best exemplify the integration of the character-defining features of the existing building and those of the site and designed landscape such as the building's stepped, multi-story massing and the curvilinear shapes in pathways, driveways, and planting areas; and other integrated landscape features such as the southeast courtyard, retaining wall and mature trees in dense landscaping evident from the south (Masonic and Euclid avenues) and east (Pine Street/Presidio Avenue); and
- Establish land use programs that focus development on limited portions of the site, but at greater intensities (e.g., additional height), particularly on the northern portion of the site along California Street, in order to incorporate more residential units.

Thus, the preservation alternatives scoping process resulted in the refinement of the full preservation alternative and the two partial preservation alternatives presented to the ARC with greater focus on retaining the character-defining features of the property that best convey the association between the building and its designed landscape and limiting new construction to the northern and western portions of the site (with increasing development intensities along California Street to better meet some of the basic project objectives [e.g., increase the housing supply]). One partial preservation alternative (Alternative E) includes the removal of the south wing of the existing office building and redevelopment on the southern portion of the site. As noted above, a new full preservation alternative (Alternative B) was developed to reflect expert opinions in the application for listing the 3333 California Street property on the National Register.

[8] Justin Greving, Preservation Planner, San Francisco Planning Department, *Final Historic Resource Evaluation Response (Part 1), Case No. 2015-014028ENV, 3333 California Street*, May 14, 2018 (see EIR Appendix C-4).

The preservation alternatives analyzed in this chapter include both office and residential uses for the existing office building in response to ARC input.

The four preservation alternatives (two full and two partial) present a reasonable range of alternatives to the proposed project and project variant, given the size of the project site and the diversity of character-defining features of the historic resource. They are the culmination of a scoping process that considered various site plans, building retention programs, building heights, views of the character-defining features, land use programs; feedback from the ARC; and information presented in the National Register Nomination Form. Descriptions and assumptions for each of the preservation alternatives are presented in this chapter (Alternatives B, C, D, and E). See Table 6.1, pp. 6.13-6.15, for a comparison of the main characteristics of the proposed project, project variant, and alternatives including a high-level summary of the retention of the historic resource.

The land use programs under certain preservation alternatives are also “reduced development” scenarios that could lessen the significant and unavoidable transit capacity and the duration of construction noise impacts as well as other significant impacts of the proposed project or project variant. For example, the significant and unavoidable impact related to increased transit demand and lack of transit capacity on the 43 Masonic route (Impact TR-4, pp. 4.C.83-4.C.88) is associated with the mix of land uses and the amount of development. At build-out, the proposed project or project variant would develop between 1.3 million to 1.5 million gross square feet of residential, retail, office, and other land uses, resulting in the introduction of up to 1,681 residents (project variant) and up to 395 employees (proposed project). (See Table 6.1, pp. 6.13-6.15, for a comparison of the land use programs for the proposed project, project variant, and alternatives.) Most of the selected alternatives represent some degree of reduced development compared to the proposed project or project variant; however, those with continued and/or expanded office uses (Alternatives B and D) would have slightly greater onsite daytime populations. The proposed alternatives with “reduced development” programs, depending on the mix of uses and related demand on transit, may result in the reduction in the severity of the transit impact. The significant and unavoidable impact related to the substantial temporary and periodic construction noise increases over existing levels (Impact NO-1, pp. 4.D.36-4.D.51) would occur with each alternative because it is based on a reasonable worst-case noise level analysis on any given day (based on the type of construction equipment, use characteristics, and site-specific issues such as the presence of bedrock near the surface). However, alternatives with excavation and building construction programs scaled down from that of the proposed project or project variant and taking a shorter period of time to build would result in fewer overall occurrences of adverse construction noise impacts. Although a reduced development alternative would limit the ability to fully achieve some of the basic project objectives, it could reduce the duration of construction noise as well as the overall amount of development and the associated residential, employment, and parking rate increases that generate significant transportation impacts.

CODE CONFORMING ALTERNATIVE

This chapter also includes a "code conforming" alternative (Alternative F). Alternative F addresses neighborhood requests for an "all-residential" or "code compliant alternative." Within the framework of a code conforming alternative, pursuant to Planning Code section 304(d)(5), planned unit developments within residential districts may include commercial uses only to the extent that such uses are necessary to serve residents of the immediate vicinity, subject to the limitations for neighborhood commercial cluster (NC-1) districts. Thus, the code conforming alternative includes limited ground-floor commercial uses.

FRAMEWORK FOR ANALYSIS OF THE ALTERNATIVES

The six alternatives to the proposed project and project variant adequately represent the range of feasible alternatives required under CEQA. They would each avoid or reduce one or more significant adverse impacts that were identified for the proposed project or project variant. Additionally, pursuant to CEQA requirements, all of the alternatives would meet most of the basic project objectives, with some achieving greater success than others (see Table 6.3, pp. 6.17-6. 19). The six alternatives are discussed below in sections 6.B through 6.G, following the comparative summary of the impacts of the alternatives relative to the proposed project and project variant in Table 6.4, pp. 6.21-6.22. The analysis here is generally qualitative relative to the identified impacts of the proposed project or project variant.

Each discussion begins with a description of the alternative and is followed by analysis of its impacts compared to those of the proposed project and project variant. Site plan, building massing, and site circulation graphics are presented for each alternative except the No Project Alternative, which only includes a site plan.

The historic resource impact analysis is based on the same environmental setting, significance thresholds, and approach to analysis as presented for the proposed project and project variant in Section 4.B. As discussed on p. 4.B.36 of that section, the CEQA Guidelines (section 15064.5(b)) establish the criteria for assessing a significant environmental impact on historical resources. They state, "[a] project with an effect that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment." CEQA Guidelines define "substantial adverse change in the significance of an historical resource" as a "physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired" (Section 15064.5(b)(1)). The significance of an historic architectural resource is considered to be "materially impaired" when a project demolishes or materially alters the physical characteristics that justify inclusion of the resource in the CRHR, or that justify inclusion of the resource in a local register, or that justify its eligibility for inclusion in the CRHR as determined by the lead agency for the purposes of CEQA (section 15064.5(b)(2)).

CEQA Guidelines section 15064.5(b)(3) includes a presumption that a project that conforms with *The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring and Reconstructing Historic Buildings*[9] (Secretary's Standards) "shall be considered as mitigated to a level of less than a significant impact on the historic resource."

Although conformance with the Secretary's Standards indicates that a project would have a less-than-significant impact on an historical resource, a project that does not conform with the Secretary's Standards does not, per se, result in a significant impact under CEQA. Alterations that are not entirely in conformance with the Secretary's Standards may, or may not, result in a significant impact under the "material impairment" significance standard of CEQA Guidelines Section 15064.5(b)(1). The relevant Secretary's Standards (Rehabilitation Standards 1, 2, 5, 9, and 10) are discussed for each alternative (excluding the No Project Alternative) as a framework for understanding and describing impacts on the historic architectural resource.

Secretary's Standards 3, 4, and 6-8 do not apply or do not require a detailed discussion for purposes of this section. Rehabilitation Standard 3 states that "each property shall be recognized as a physical record of its time, place, and use," and, "changes that create a false sense of historical development, such as adding conjectural features or architectural elements from other buildings, shall not be undertaken." There are no proposed changes under any of the preservation alternatives that would create a false sense of history or would be considered conjectural; therefore, the preservation alternatives would be in conformance with Standard 3. Rehabilitation Standard 4 states, "changes that have acquired historic significance in their own right shall be retained and preserved." Aside from the previously determined phases of construction that have all taken on significance, there are no other changes to the property that have taken on significance. Therefore Standard 4 does not apply to any of the alternatives. Rehabilitation Standard 6 states, "deteriorated historic features shall be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature will match the old in design, color, texture, and where possible, materials. Replacement of missing features will be substantiated by documentary and physical evidence." If there are character-defining features identified in the preservation alternatives that would be retained, they would be repaired or replaced in conformance with Standard 6; thus, the preservation alternatives would be in general conformance with Standard 6. A discussion of retained or replaced character-defining features is included for each preservation alternative. Rehabilitation Standard 7 states that "Chemical or physical treatments, such as sandblasting, that cause damage to historic materials shall not be used. The surface cleaning of structures, if appropriate, shall be undertaken using the

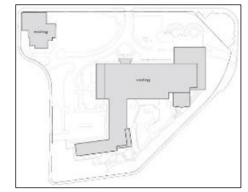
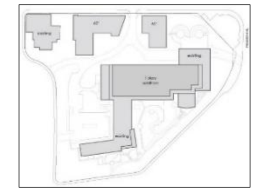
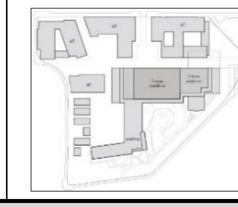
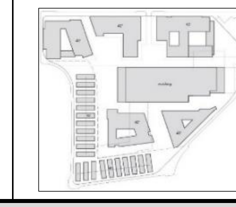
[9] U. S. Department of the Interior, National Park Service (Kay D. Weeks and Anne E. Grimmer), *The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstruction of Historic Buildings,* 1995, https://www.nps.gov/tps/standards/four-treatments.htm, accessed May 3, 2018.

gentlest means possible." If it is determined that chemical or physical treatments to historic materials are required, they would be undertaken using the gentlest means possible in conformance with Standard 7. Rehabilitation Standard 8 states that "significant archeological resources affected by a project shall be protected and preserved" and that "if such resources must be disturbed, mitigation measures shall be undertaken." Mitigation has been identified to reduce the potential impact to archaeological resources to a less-than-significant level. The same mitigation measures would be applicable to each of the alternatives. Thus, each alternative with mitigation incorporated would comply with Standard 8.

The alternatives analyses for Transportation and Circulation, Noise and Vibration, and Air Quality, where necessary, present a quantitative analysis in order to provide a more refined comparison of the severity of impacts of the alternatives relative to those of the proposed project and project variant. (See Table 6.2, p. 6.16, for travel demand and parking rates for each of the alternatives. It shows person-trips and vehicle-trips by mode for the weekday daily and a.m. and p.m. peak hours and parking rate summaries for the residential, retail, and other non-residential uses, using the same methodology as that for the proposed project and project variant.)

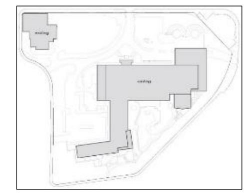
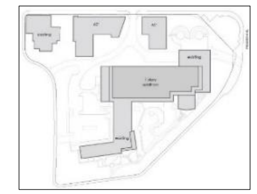
Following the analysis of the alternatives, Section 6.H, Environmentally Superior Alternative, pp. 6.210-6.214, identifies the environmentally superior alternative among the alternatives considered. The environmentally superior alternative is generally defined as the alternative that would result in the least adverse environmental impacts to the project site and affected environment. Table 6.4, pp. 6.21-6.22, provides a summary comparison of the significant impacts of the proposed project, project variant, and alternatives. Section 6.I, Alternatives Considered and Rejected, pp. 6.214-6.218, identifies alternatives that were considered by the lead agency and identifies the reasons for their elimination from detailed consideration in the EIR.

Table 6.1: Comparison of Characteristics of the Proposed Project, Project Variant, and EIR Alternatives

	Proposed Project	Project Variant	Alternative A: No Project Alternative	Alternative B: Full Preservation – Office Alternative	Alternative C: Full Preservation – Residential Alternative	Alternative D: Partial Preservation – Office Alternative	Alternative E: Partial Preservation – Residential Alternative	Alternative F: Code Conforming Alternative
								
Characteristics of the Proposed Project, Project Variant, and Alternatives								
Building Height (feet)	37 – 92	37 – 92	55.5	18 – 67	40 – 67	37 – 80	37 – 80	40 – 55.5
Number of Stories	3 – 7 stories	3 – 7 stories	1 – 4 stories	1 – 6 stories	4 – 6 stories	4 – 6 stories	4 – 6 stories	4 stories
Number of New or Renovated Buildings	15	15	-	4	5	11	13	27
Site Disturbance	Full Site	Full Site	None	Northern Portion of Site	Northern and Western Portions of Site	Northern and Western Portions of Site	Northern, Western and Southern Portions of Site	Full Site
Excavation	Yes	Yes	No	Yes	Yes	Yes	Yes	Yes
Demolition debris and excavated soils (cubic yards [cy])	288,300 cy	288,300 cy	–	Less	Less	Less	Less	Similar
Construction Duration	7 – 15 years 4 phases	7 – 15 years 4 phases	–	2 years one phase	5.5 years two phases	5.5 years three phases	6.5 years four phases	7 – 15 years 4 phases
Use (gross square feet)	**1,372,270**	**1,476,987**	**469,000**	**831,856**	**1,141,734**	**1,348,702**	**1,267,740**	**1,180,004**
Residential	824,691	978,611	–	187,668	705,179	475,247	811,867	849,521
Office NOTE A	49,999	–	338,000 *(office bldg.)* 14,000 *(annex bldg.)*	392,459 *(office bldg.)* 14,000 *(annex bldg.)*	–	402,404 *(office bldg.)*	–	–
Retail	54,117	48,593	–	–	44,306	44,306	44,306	14,995
Daycare	14,690	14,650	11,500	–	14,650	14,650	14,650	–
Storage Space			12,500	–	–	–	–	–
Parking	428,773	435,133	93,000	237,729	377,599	412,095	396,917	315,488
Dwelling Units	**558**	**744**	–	**167**	**534**	**456**	**588**	**629**
Studio+1 bedroom	235	420	–	108	343	321	359	349
2 bedroom	195	196	–	48	117	97	140	167
3 bedroom	101	101	–	11	59	30	64	102
4 bedroom	27	27	–	–	15	8	25	11
Vehicle Parking Spaces	**896**	**970**	**543**	**765**	**746**	**1,132**	**800**	**740**
Residential	558	744	–	167	534	456	588	629
Retail	138	128	–	–	115	69	115	45
Commercial	60	60	–	–	60	–	60	60
Office	100	–	–	585	–	570	–	–
Daycare	29	29	–	–	29	21	29	–
Car Share	11	9	–	13	8	16	8	6

Notes:
NOTE A Existing office uses are inclusive of the accessory uses at the existing office building – the 11,500-gross-square-foot childcare use and 12,500 gross square feet of storage space.

(continued)

	Proposed Project	Project Variant	Alternative A: No Project Alternative	Alternative B: Full Preservation – Office Alternative	Alternative C: Full Preservation – Residential Alternative	Alternative D: Partial Preservation – Office Alternative	Alternative E: Partial Preservation – Residential Alternative	Alternative F: Code Conforming Alternative
								
Freight and Passenger Loading Zones	**10**	**10**	**5**	**6**	**5**	**6** NOTE B	**8**	**10**
On Street (Freight / Passenger)	4 (1 / 3)	4 (1 / 3)	0	1 (1 / 0)	2 (1 / 1)	3 (1 / 2)	3 (1 / 2)	4 (1 / 3)
Off Street	6 (freight)	6 (freight)	5	5 (freight [existing])	3 (freight)	3 (freight)	5 (freight)	6 (freight)
Bicycle Parking Spaces	**693**	**890**	**15**	**257**	**474**	**501**	**551**	**606**
Residential Class 1/Class 2	558 / 56	744 / 75	–	157 / 9	403 / 27	371 / 23	478 / 29	567 / 31
Retail Class 1/Class 2	14 / 33	14 / 37	–	–	6 / 18	6 / 18	6 / 18	2 / 6
Daycare Class 1/Class 2	10 / 10	10 / 10	–	–	10 / 10	10 / 10	10 / 10	–
Office Class 1/Class 2	10 / 2	–	–	81 / 10	–	53 / 10	–	–
Character-Defining Features of the Property NOTE C								
Existing Office Building	Partially Retained	Partially Retained	Retained	Retained	Retained	Retained	Partially Retained	Partially Retained
Site and Landscape	Demolished	Demolished	Retained	Retained	Retained	Partially Retained	Partially Retained	Demolished
Transportation and Circulation Features								
Transportation Demand Management Measures	Yes NOTE D	Yes NOTE D		Yes	Yes	Yes	Yes	Yes
Streetscape Changes								
Curb Cuts								
California Street	1	1	1	1	1	1	1	1
Presidio Avenue	1	1	1	1	1	1	1	1
Masonic Avenue	2	2	None	None	1	1	1	2
Euclid Avenue	None	None	None	None	None	None	1	9
Laurel Street	7	7	2	2	3	6	8	13
Sidewalk Extensions								
Presidio and Masonic avenues (10 to 15 feet)	Yes	Yes	No	Yes	Yes	Yes	Yes	Yes
Euclid Avenue and Laurel Street (10 to 12 feet)	Yes	Yes	No	Yes	Yes	Yes	Yes	Yes
Intersection Improvements								
California and Walnut streets (bulbouts)	Yes	Yes	No	Yes	Yes	Yes	Yes	Yes
California and Laurel streets (bulbouts) NOTE E	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Euclid Avenue and Laurel Street (bulbout)	Yes	Yes	No	No	No	Yes	Yes	Yes

Notes: ***(continued)***

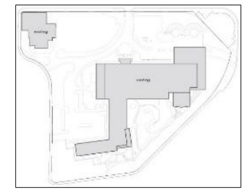
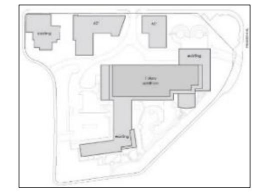
NOTE B Alternative D would increase the length of the proposed commercial freight loading zone from 100 feet to 180 feet.

NOTE C **Retained** – Most, if not all, of the character-defining features to be kept such that the property would convey its historical and architectural significance that justify its inclusion in the California Register. **Partially Retained** – Some of the character-defining features to be kept but the element has been demolished or materially altered in an adverse manner and no longer conveys its historical and architectural significance that justify its inclusion in the California Register. **Demolished** – Most, if not all, of the character-defining features to be removed such that the element has been demolished or materially altered in an adverse manner and no longer conveys its historical and architectural significance that justify its inclusion in the California Register.

NOTE D The measures in the Transportation Demand Management Plan that would be part of the proposed project or project variant (Improve Walking Conditions, Bicycle Parking, Showers and Lockers, Bicycle Repair Station, Car Share Parking, Delivery Supportive Amenities, Onsite Childcare, Multimodal Wayfinding Signage, Real Time Information Displays, Tailored Transportation Marketing, Unbundle Parking) are intended to reduce per capita vehicle miles traveled and may be refined during the planning review process for project entitlements. Alternatives would include these features as applicable.

NOTE E The transit stop shift (from the southwest to the southeast corner of California and Laurel streets) and the construction of a 90-foot-long transit bulbout at the southeast corner has occurred with implementation of the adjacent California Laurel Village Improvement Project and implementation of Muni Forward improvements.

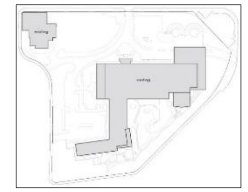
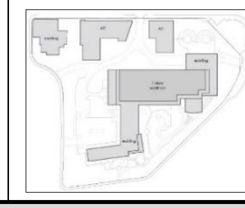
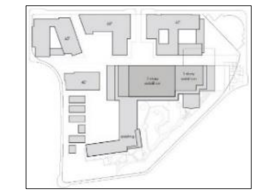
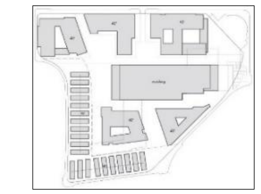
(continued)

	Proposed Project	Project Variant	Alternative A: No Project Alternative	Alternative B: Full Preservation – Office Alternative	Alternative C: Full Preservation – Residential Alternative	Alternative D: Partial Preservation – Office Alternative	Alternative E: Partial Preservation – Residential Alternative	Alternative F: Code Conforming Alternative
								
Presidio Avenue/Pine Street/Masonic Avenue (Pine Street Steps and Plaza)	Yes	Yes	No	No	Yes	Yes	Yes	Yes
Masonic Avenue/Euclid Avenue (Corner Plaza)	Yes	Yes	No	No	No	No	No	Yes
Mayfair Drive/Laurel Street (bulbout)	Yes	Yes	No	No	Yes	Yes	Yes	Yes
On-Street Parking Spaces								
Number of Spaces Removed Along Adjacent Streets	36	36	0	5	16	26	32 (four fewer)	59 (23 more)
Sustainability Features NOTE F								
LEED Certification Goal	LEED ND Gold	LEED ND Gold	–	LEED ND Gold	LEED ND Gold	LEED ND Gold	LEED ND Gold	LEED ND Gold
Utility Infrastructure								
connect to existing water, sewer, natural gas, and electrical infrastructure systems (California and Laurel streets and Presidio Avenue)	Yes	Yes	–	Yes	Yes	Yes	Yes	Yes
new water line (connect center building/existing office building to existing water line [Laurel Street])	Yes	Yes	–	No	Yes	Yes	Yes	Yes
new hydrants (center building/existing office building)	Yes	Yes	–	No	Yes	Yes	Yes	Yes
new sewer line (Masonic Avenue)	Yes	Yes	–	No	No	No	No	Yes
new natural gas lines (Euclid and Masonic avenues)	Yes	Yes	–	No	No	No	No	Yes

Notes: ***(continued)***
NOTE F The proposed project and project variant would include non-potable water capture and reuse infrastructure, green roof infrastructure, solar photovoltaic system infrastructure, and roof-mounted solar thermal hot water infrastructure. Alternatives would include these features as applicable.

Source: Laurel Heights Partners, LLC, 2018; Kittelson & Associates, Inc., 2018; SWCA, 2018

Table 6.2: Comparison of Person-Trip and Vehicle-Trip Generation Estimates by Mode – External Trips, and Parking Rate Summary for the Proposed Project, Project Variant, and EIR Alternatives

	Proposed Project	Project Variant	Alternative A: No Project Alternative	Alternative B: Full Preservation – Office Alternative	Alternative C: Full Preservation – Residential Alternative	Alternative D: Partial Preservation – Office Alternative	Alternative E: Partial Preservation – Residential Alternative	Alternative F: Code Conforming Alternative
								
Person-Trip and Vehicle-Trip Generation Estimates by Mode – External Trips NOTE A								
Daily								
Auto Trips	10,057	9,812	3,349	3,968	7,491	11,303	7,712	4,304
Transit Trips	2,353	2,466	1,480	1,953	1,658	3,219	1,767	1,420
Walk Trips	3,475	3,290	986	914	2,368	3,609	2,379	922
Other Trips	576	603	322	314	279	599	282	151
Total Daily Person Trips	***16,462***	***16,171***	***6,130***	***7,178***	***11,812***	***18,749***	***12,159***	***6,835***
Total Vehicle Trips	***5,760***	***5,744***	***1,955***	***2,343***	***4,156***	***6,368***	***4,287***	***2,465***
Weekday AM								
Auto Trips	1,197	1,235	308	360	901	1,216	933	554
Transit Trips	295	324	142	202	228	368	245	211
Walk Trips	376	359	92	75	270	377	272	106
Other Trips	49	48	20	22	35	57	36	20
Total Weekday A.M. Person Trips	***1,917***	***1,966***	***563***	***659***	***1,434***	***2,018***	***1,486***	***891***
Total Weekday A.M. Vehicle Trips	***691***	***726***	***211***	***255***	***519***	***736***	***539***	***340***
Weekday PM								
Auto Trips	1,298	1,349	320	388	1,082	1,307	1,120	630
Transit Trips	330	392	148	218	272	403	292	244
Walk Trips	398	387	90	80	328	392	332	127
Other Trips	60	61	19	25	48	64	50	30
Total Weekday P.M. Person Trips	***2,086***	***2,189***	***578***	***710***	***1,730***	***2,165***	***1,794***	***1,031***
Total Weekday P.M. Vehicle Trips	***752***	***804***	***219***	***275***	***624***	***791***	***649***	***388***
Neighborhood Parking Rate by Land Use Summary								
Residential (Existing Rate = 0.90)	1.00	1.00	N/A	1.00	1.00	1.00	1.00	1.00
Retail (Existing Rate = 1.55)	3.66	3.87	N/A	-	3.95	1.56	3.95	7.00
Other Non-residential (Existing Rate = 1.44)	1.99	1.98	1.44	1.44	1.98	1.44	1.98	-

Note:
NOTE A Numbers may not sum due to rounding.
Source: Kittelson & Associates, Inc., 2018; SWCA, 2018

Table 6.3: Ability of Alternatives to Meet Basic Project Objectives

Project Objectives	Alternative A: No Project Alternative	Alternative B: Full Preservation – Office Alternative	Alternative C: Full Preservation – Residential Alternative	Alternative D: Partial Preservation – Office Alternative	Alternative E: Partial Preservation – Residential Alternative	Alternative F: Code Conforming Alternative
Would the alternative meet this objective?						
1. Redevelop a large underutilized commercial site into a new high quality walkable mixed-use community with a mix of compatible uses including residences, neighborhood-serving ground floor retail, on-site child care, potential office/commercial uses, and substantial open space.	No	Partially	Partially	Partially	Yes	Partially
2. Create a mixed-use project that encourages walkability and convenience by providing residential uses, neighborhood-serving retail, on-site child care, and potential office/commercial uses on site.	No	Partially	Partially	Partially	Yes	Partially
3. Address the City's housing goals by building new residential dwelling units on the site, including on-site affordable units, in an economically feasible project consistent with the City's General Plan Housing Element and ABAG's Regional Housing Needs Allocation for the City and County of San Francisco.	No	Partially	Partially	Partially	Yes	Yes

Project Objectives	Alternative A: No Project Alternative	Alternative B: Full Preservation – Office Alternative	Alternative C: Full Preservation – Residential Alternative	Alternative D: Partial Preservation – Office Alternative	Alternative E: Partial Preservation – Residential Alternative	Alternative F: Code Conforming Alternative
Would the alternative meet this objective?						
4. Open and connect the site to the surrounding community by extending the neighborhood urban pattern and surrounding street grid into the site through a series of pedestrian and bicycle pathways and open spaces, including a north-south connection from California Street to Euclid Avenue that aligns with Walnut Street and an east-west connection from Laurel Street to Presidio Avenue.	No	No	Partially	Partially	Partially	Partially
5. Create complementary designs and uses that are compatible with the surrounding neighborhoods by continuing active ground floor retail uses along California Street east from the Laurel Village Shopping Center, adding to the mix of uses and businesses in the area, and providing activated, neighborhood-friendly spaces along the Presidio, Masonic and Euclid avenue edges compatible with the existing multi-family development to the south and east.	No	No	Partially	Partially	Partially	Partially
6. Provide a high quality and varied architectural and landscape design that is compatible with its diverse surrounding context, and utilizes the site's topography and other unique characteristics.	No	Yes	Yes	Yes	Yes	Partially

Project Objectives	Alternative A: No Project Alternative	Alternative B: Full Preservation – Office Alternative	Alternative C: Full Preservation – Residential Alternative	Alternative D: Partial Preservation – Office Alternative	Alternative E: Partial Preservation – Residential Alternative	Alternative F: Code Conforming Alternative
Would the alternative meet this objective?						
7. Provide substantial open space for project residents and surrounding community members by creating a green, welcoming, walkable environment that will encourage the use of the outdoors and community interaction.	No	Partially	Partially	Partially	Partially	Partially
8. Incorporate open space in an amount equal to or greater than that required under the current zoning, in multiple, varied types designed to maximize pedestrian accessibility and ease of use.	No	Partially	Partially	Partially	Partially	Partially
9. Include sufficient off-street parking for residential and commercial uses in below-grade parking garages to meet the project's needs.	No	Yes	Yes	Yes	Yes	Yes
10. Work to retain and integrate the existing office building into the development to promote sustainability and eco-friendly infill re-development.	No	Yes	Yes	Yes	Yes	Yes

Source: Laurel Heights Partners, LLC

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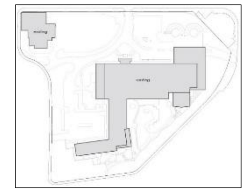
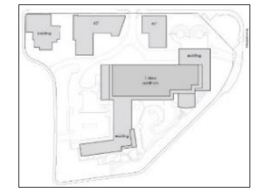
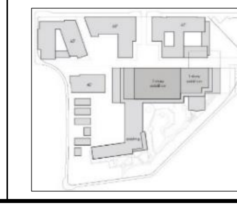
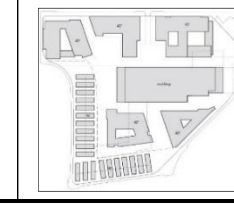
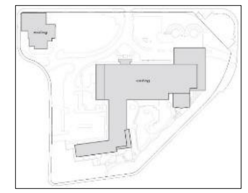
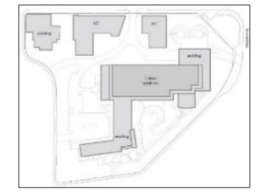
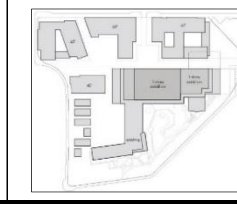
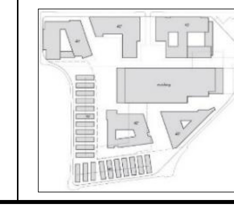
Table 6.4: Comparison of Significant Impacts of the Proposed Project, Project Variant, and EIR Alternatives

	Proposed Project	Project Variant	Alternative A: No Project Alternative	Alternative B: Full Preservation – Office Alternative	Alternative C: Full Preservation – Residential Alternative	Alternative D: Partial Preservation – Office Alternative	Alternative E: Partial Preservation – Residential Alternative	Alternative F: Code Conforming Alternative
								
Legend: NI = No impact; LTS = Less than significant or negligible impact, no mitigation required; SM = Significant but mitigable; SU = Significant and unavoidable adverse impact, no feasible mitigation; SUM = Significant and unavoidable impact after mitigation; NA = Not Applicable								
Summary of Significant Impacts of the Proposed Project, Project Variant, and Alternatives								
Section 4.B: Cultural Resources (Historic Architectural) Impacts								
CR-1: The proposed project or project variant would materially alter, in an adverse manner, the physical characteristics of the historical resource that justify its inclusion in the California Register of Historical Resources.	SUM	SUM	NI	LTS	LTS	SUM (reduced)	SUM (reduced)	SUM
Section 4.C: Transportation and Circulation Impacts								
TR-2: The proposed project or project variant would cause substantial additional VMT and/or substantially induce automobile travel.	SM	SM	NI	LTS	SM	LTS	SM	SM
TR-4: The proposed project or project variant would result in an adverse transit capacity utilization impact for Muni route 43 Masonic during the weekday a. m. peak hour under baseline conditions.	SUM	SUM	NI	SUM (reduced)	SUM (reduced)	SUM (greater)	SUM (reduced)	SUM (reduced)
C-TR-2: The proposed project's or project variant's incremental effects on regional VMT would be significant, when viewed in combination with past, present, and reasonably foreseeable future projects.	SM	SM	NI	LTS	SM	LTS	SM	SM
Section 4.D: Noise and Vibration Impacts								
NO-1: Construction of the proposed project or project variant would expose people to or generate noise levels in excess of applicable standards or cause a substantial temporary or periodic increase in ambient noise levels.	SUM	SUM	NI	SUM (reduced)	SUM (reduced)	SUM (reduced)	SUM	SUM
NO-2: Construction of the proposed project or project variant would expose structures to or generate excessive groundborne vibration levels but not excessive groundborne noise.	SM	SM	NI	LTS	SM	SM	SM	SM
NO-3: Operation of the proposed project or project variant would result in a substantial permanent increase in ambient noise levels in the immediate project vicinity, or permanently expose persons to noise levels in excess of standards in the San Francisco General Plan and the San Francisco Noise Ordinance.	SM	SM	NI	SM	SM	SM	SM	SM

(continued)

	Proposed Project	Project Variant	Alternative A: No Project Alternative	Alternative B: Full Preservation – Office Alternative	Alternative C: Full Preservation – Residential Alternative	Alternative D: Partial Preservation – Office Alternative	Alternative E: Partial Preservation – Residential Alternative	Alternative F: Code Conforming Alternative
								

Legend: NI = No impact; LTS = Less than significant or negligible impact, no mitigation required; SM = Significant but mitigable; SU = Significant and unavoidable adverse impact, no feasible mitigation; SUM = Significant and unavoidable impact after mitigation; NA = Not Applicable

	Proposed Project	Project Variant	Alternative A	Alternative B	Alternative C	Alternative D	Alternative E	Alternative F
Summary of Significant Impacts of the Proposed Project, Project Variant, and Alternatives Identified for Topics in the Initial Study								
Topic E.3, Cultural Resources (Archaeological Resources, Human Remains, Tribal Cultural Resources) Impacts								
CR-2: Construction activities of the proposed project or project variant could cause a substantial adverse change in the significance of an archaeological resource.	SM	SM	NI	SM	SM	SM	SM	SM
CR-3: Construction activities of the proposed project or project variant could disturb human remains, if such remains are present within the project site.	SM	SM	NI	SM	SM	SM	SM	SM
CR-4: Construction activities of the proposed project or project variant could disturb tribal cultural resources, if such resources are present within the project site.	SM	SM	NI	SM	SM	SM	SM	SM
Topic E.12, Biological Resources Impacts								
BI-1: The proposed project or project variant would have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service; and the proposed project or project variant would interfere substantially with the movement of native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.	SM	SM	NI	SM	SM	SM	SM	SM
Topic E.13, Geology and Soils Impacts								
GE-5: The proposed project or project variant would directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.	SM	SM	NI	SM	SM	SM	SM	SM

Source: Laurel Heights Partners, LLC, 2018, SWCA, 2018

B. ALTERNATIVE A: NO PROJECT ALTERNATIVE

CEQA Guidelines section 15126.6(e) requires that, among the project alternatives, a "no project" alternative be evaluated. CEQA Guidelines section 15126.6(e)(2) requires that the no project alternative analysis "discuss the existing conditions…as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and policies and consistent with the available infrastructure and community services." As noted in CEQA Guidelines section 15126.6, an EIR on "a development project on identifiable property" typically analyzes a no project alternative, i.e., "the circumstance under which the project does not proceed. Such a discussion would compare the environmental effects of the property remaining in its existing state against environmental effects that would occur if the project is approved. If disapproval of the project under consideration would result in predictable actions by others, such as the proposal of some other project, this 'no project' consequence should be discussed."

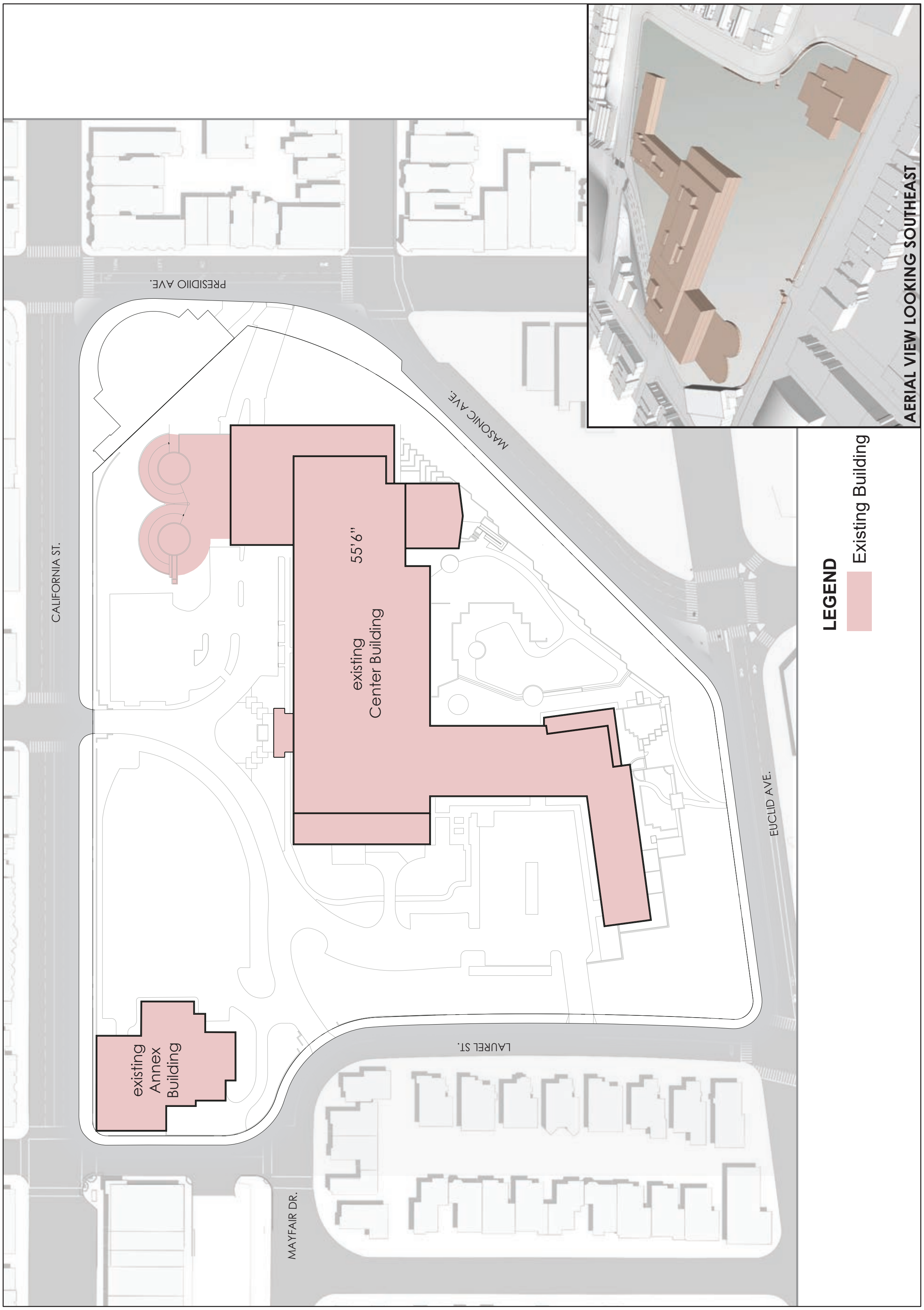
ASSUMPTIONS

Under the no project alternative, the existing land use controls on the project site would continue to govern site development and would not be changed. UCSF's departments and the childcare facility on the Laurel Heights campus would relocate. For the purposes of this analysis, it is assumed that under Alternative A the existing site would continue to function as an office use, which would not constitute a change from existing conditions, and that, based on the city's standard office occupancy rate of 276 gross square feet of space per employee (used for trip generation purposes), the alternative assumes there would be a slight increase in the number of onsite employees compared to existing conditions (from approximately 1,200 employees to approximately 1,362 employees).

DESCRIPTION OF THE NO PROJECT ALTERNATIVE

Under Alternative A, the existing physical features on the project site would not change (see Figure 6.1: Alternative A: No Project Alternative –Site **Plan**). The existing four-story, approximately 455,000-gross-square-foot building (approximately 362,000 gross square feet of office uses[10] plus the three-level, 212-space, approximately 93,000-gross-square-foot, partially below-grade parking garage), and the single-story, approximately 14,000-gross-square-foot annex building at the northwest corner of the project site would be generally retained in their current conditions.

[10] The existing office building's gross square footage includes UCSF's accessory 12,500 gross square feet of storage space and the 11,500-gross-square-foot childcare use.



Source: Laurel Heights Partners, LLC (2018)

3333 CALIFORNIA STREET MIXED-USE PROJECT

2015-014028ENV

FIGURE 6.1: ALTERNATIVE A: NO PROJECT ALTERNATIVE - SITE PLAN

The existing glazing has been modified from the original system and, based on current condition of the office building's glass curtain wall system, would likely require in-kind replacement.[11] No other modifications, repairs, or restoration activities would be conducted on the exterior. In addition, the interior of the existing office building could be altered as part of tenant leasing agreements. Any such alterations would not result in a change to the amount of currently leasable office space.

The development of the proposed project or project variant would not occur under Alternative A. Thus, there would be no change to the character-defining features of the existing office building or the associated site and landscape.

Under Alternative A, there would also be no change to existing site circulation. The parking program would not be altered, and the existing 543 parking spaces (212 in the partially below-grade parking garage and 331 surface parking spaces) and connecting internal roadways would remain. The 60-space paid public parking area (included in the 543-parking space count) at the northeast corner of the project site would also be retained and would continue to be available to neighborhood residents, visitors, and institutions. In addition, new or relocated curb cuts, sidewalk extensions, corner bulbouts, and streetscape improvements would not be constructed. The transit stop shift (from the southwest to the southeast corner of California and Laurel streets) and the construction of a 90-foot-long transit bulbout at the southeast corner would occur as part of the adjacent California Laurel Village Improvement Project and implementation of Muni Forward improvements. Because the existing site would continue to function as an office use, the existing physical features on the project site would not change nor would any new development take place. Therefore, Alternative A would not achieve any of the project objectives (see Table 6.3, pp. 6.17-6.19).

IMPACTS OF THE NO PROJECT ALTERNATIVE

This environmental analysis assumes that the existing structures and uses on the project site would not change and that the existing physical conditions described in Chapter 4, Environmental Setting and Impacts, and in Section E, Evaluation of Environmental Effects, in the initial study would remain the same.

If Alternative A were to proceed, no changes would be implemented, and none of the impacts associated with the proposed project or project variant, as described in Chapter 4 of the EIR and Section E of the initial study, would occur. However, incremental changes would be expected to occur in the vicinity of the project site as nearby reasonably foreseeable cumulative projects (see pp. 4.A.7-4.A.13) are approved, constructed, and occupied. With no change to existing site

[11] Alterations to the existing office building would be subject to planning department preservation staff review and issuance of a CEQA determination.

conditions under the No Project Alternative, land use activity on the project site would not contribute to significant cumulative impacts beyond existing levels.

HISTORIC ARCHITECTURAL RESOURCES

Under Alternative A, none of the existing buildings on the project site or the character-defining features of the site and landscape would be demolished. The only changes to the existing office building would be the compatible replacement of the glass curtain walls and general building maintenance and landscape management, where necessary; the current office use would be continued. Therefore, compared to the proposed project and the project variant, which would have a significant and unavoidable project-level impact on historic architectural resources (Impact CR-1), Alternative A would not have any impacts related to historic architectural resources.

TRANSPORTATION AND CIRCULATION

With existing uses retained, transportation and circulation conditions would remain as they are under existing conditions. Alternative A would not generate construction-related truck traffic or worker trips to and from the project site. Therefore, Alternative A would not have any construction-related transportation impacts and would not contribute to cumulative construction-related impacts on traffic, transit, pedestrian, and bicycle circulation from other construction projects in the vicinity. In contrast, the alternative would result in minor increases in operations-related travel to and from the project site over existing conditions associated with slight increase in employee population. Like the proposed project and project variant, Alternative A would have less-than-significant project-specific impacts on traffic hazards, pedestrian or bicycle travel, loading, and emergency vehicle access. No significant impacts associated with vehicle miles traveled or transit capacity would occur. Alternative A would not contribute to any cumulative impacts as none were identified. Therefore, none of the transportation and circulation mitigation measures identified for the proposed project or project variant (Mitigation Measure M-TR-2: Reduce Retail Parking Supply and Mitigation Measure M-TR-4: Monitor and Provide Fair Share Contribution to Improve 43 Masonic Capacity) would be applicable to Alternative A.

NOISE AND VIBRATION

Under Alternative A, the project site would continue to be used as an office complex and site conditions would not change. The significant and unavoidable construction-related noise increases (Impact NO-1), significant construction-related groundborne vibration effects (Impact NO-2), and significant operational noise increases from stationary equipment (Impact NO-3) that would be attributable to the proposed project or project variant would not occur. The mitigation measures identified for the proposed project or project variant (Mitigation Measure M-NO-1: Construction Noise Control Measures, Mitigation Measure M-NO-2: Vibration Monitoring Program for SF Fire Credit Union Building, and Mitigation Measure

M-NO-3: Stationary Equipment Noise Controls) would not be applicable, as no new construction would occur. Compared to the proposed project or project variant, Alternative A would not have any project-level noise and vibration impacts, and would not contribute to any cumulative impacts related to noise and vibration as none were identified.

AIR QUALITY

Under Alternative A, the project site would continue to be used as an office complex and site conditions would not change. Alternative A would not include demolition or construction activities on the project site, and, consequently, no new sources of construction-related air pollutants would be introduced. Existing stationary sources of air pollution on and near the project site and major roadways contributing to air pollution in the project vicinity would remain as they are under existing conditions. Alternative A would not result in project-level air quality impacts. In addition, no significant cumulative impact related to air quality has been identified. Alternative A would not conflict with the goals of the air district's *2017 Bay Area Clean Air Plan* and would not create any new source of odors. Thus, there would be no air quality impacts as a result of Alternative A, and impacts would be reduced compared with the less-than-significant air quality impacts under the proposed project and project variant.

INITIAL STUDY TOPICS

The initial study concluded that the proposed project and project variant would have no impacts, less-than-significant impacts, or less-than-significant impacts with mitigation in the following analysis areas: Land Use and Planning, Population and Housing, Cultural Resources (archaeological resources, human remains and tribal cultural resources), Greenhouse Gas Emissions, Wind and Shadow, Recreation, Utilities and Service Systems, Public Services, Biological Resources, Geology and Soils, Hydrology and Water Quality, Hazards/Hazardous Materials, Mineral/Energy Resources, and Agricultural and Forest Resources.

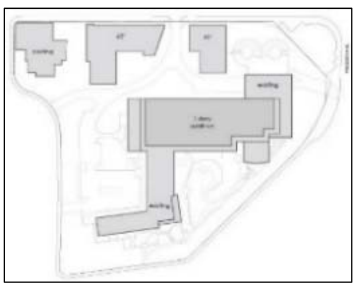
For the most part, Alternative A would result in no impacts related to any of these environmental topics, because this alternative would result in no changes to existing site conditions. However, the continued office use assumes a relatively small increase in the employed population and possible tenant improvements to accommodate a different type of commercial entity or multiple commercial entities. The employment increase would be minor and therefore impacts related to population would be less than significant. Because there would be no demolition or new building construction at the site under Alternative A, mitigation measures presented in the initial study in Section F would not be required under Alternative A.

CONCLUSION

Under Alternative A, existing conditions on the project site would not change. The existing buildings, surface parking lots, and landscaping would be retained in their current conditions;

there would be no alterations or additions to either of the existing buildings (beyond exterior modifications for maintenance and repair, replacement of the window wall system, and interior alterations to accommodate a new tenant mix); and new buildings on the perimeter of the site would not be constructed. There would also be no change to existing site circulation. Alternative A would have no significant impacts related to historic architectural resources, transportation and circulation, or noise and vibration. Alternative A would have less-than-significant impact or no impacts on topics determined in the EIR or initial study to be either less than significant or less than significant with mitigation under the proposed project or project variant, and would not require mitigation measures.

C. ALTERNATIVE B: FULL PRESERVATION – OFFICE ALTERNATIVE

Overview: 	Existing four-story office building and annex building retained in their entirety and office use continued. One-level vertical addition constructed on roof. Parking garage under existing office building retained. Plaza B and Walnut buildings and California Street Garage set back from California Street to retain brick perimeter wall. Majority of site retained in existing condition. Uses: Mostly office (continued and expanded), some residential (in new construction), and parking; no retail or daycare.
Character-Defining Features Retained:	Character-defining features of the existing building identified in the planning department's HRER and the National Register nomination form retained. Site and landscape features contributing to corporate campus setting identified in the National Register nomination, including those on the north portion of project site, mostly retained. Most prominent views of project site retained with minimal change.
General Comparison to Proposed Project and Variant:	• Reduced land use program with fewer residential uses, more office space, and no other uses. • Building and garage footprints different. • Heights of Plaza B and Walnut buildings - 60 feet. • Retained annex building and brick perimeter wall along California and Laurel streets. • Less parking provided. • More of project site retained as open space. • Due to reduced land use program, could address magnitude or severity of other significant impacts of proposed project or project variant, e.g., vehicle miles traveled, transit capacity for Muni's 43 Masonic route, noise along Laurel and Euclid avenues.

LAND USE PROGRAM

Alternative B would have a total of 831,856 gross square feet of new and rehabilitated space, as follows:

- 187,668 gross square feet of residential floor area (167 residential units)
- 406,459 gross square feet of office space
- 237,729 gross square feet of parking

Up to 765 vehicle parking spaces, including 13 car-share spaces, would be provided in the proposed California Street Garage (two levels), the retained parking garage under the existing office building (three levels), and a portion of the retained surface parking lots on the western portion of the site near Laurel Street. (See Table 6.1 on pp. 6.13-6.15.)

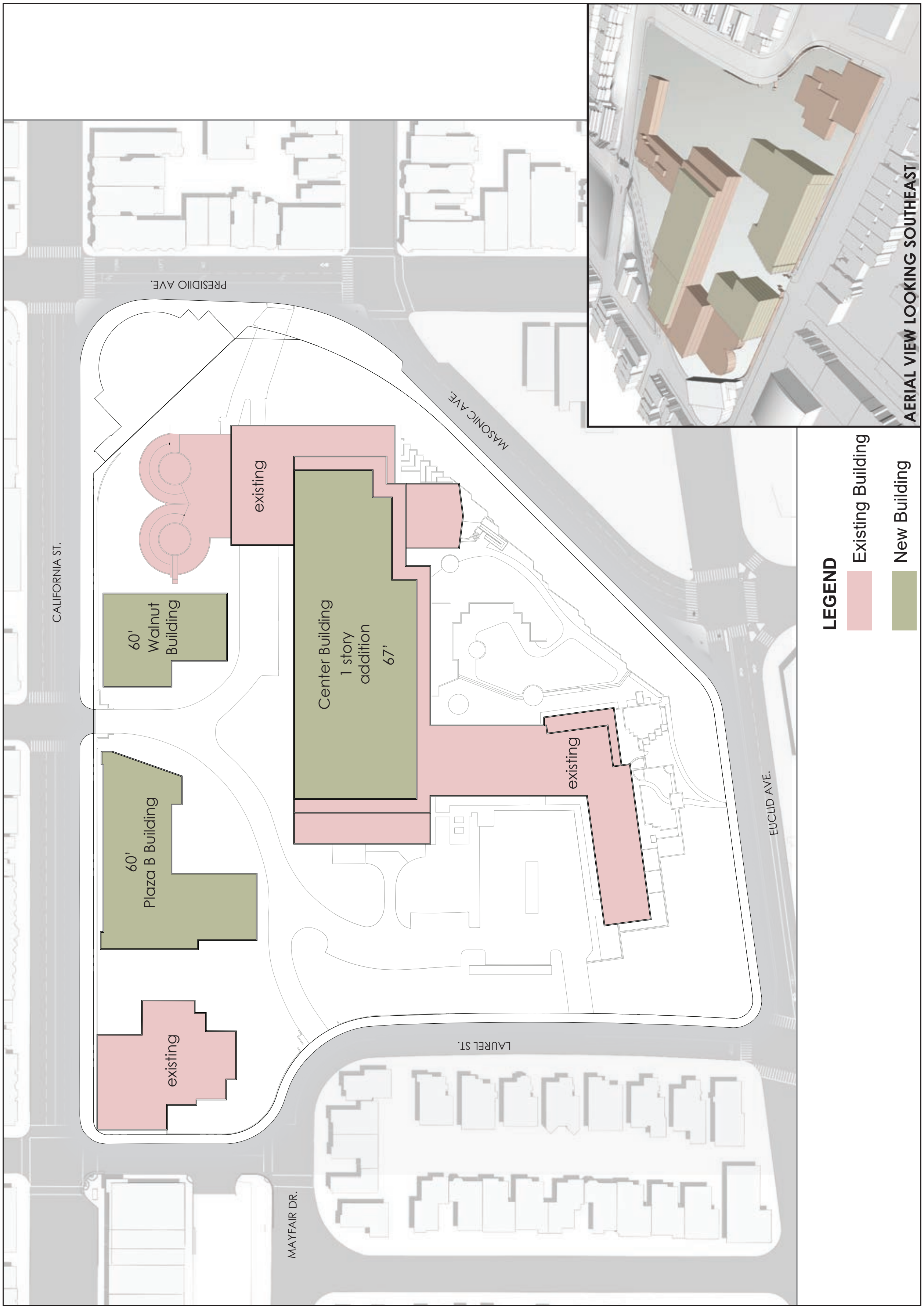
The land use program would be reduced by approximately 39 percent compared to the proposed project and 44 percent compared to the project variant.

OVERVIEW

Under Alternative B, the existing four-story office building would be retained in its entirety and would continue as office use. A one-level vertical addition would be constructed on the roof to expand the usable space for office uses, replacing the existing mechanical penthouse. As shown on Figure 6.2: Alternative B: Full Preservation – Office Alternative Site Plan, new construction on the project site would be limited to the northern portion of the site adjacent to California Street. Two new multi-family residential buildings (the Plaza B and Walnut buildings) and the California Street Garage would be developed in the areas occupied by the surface parking lots on that portion of the site. The annex building, the perimeter brick wall that borders the north and west (partial) boundaries of the project site, and a portion of the surface parking lot on the western portion of the site, south of Mayfair Drive, would be retained. Existing conditions on the southern and eastern portions of the project site would be maintained. The most prominent views of the project site, from the east on Pine Street (looking west) and from the south on Masonic Avenue (looking north), would be retained with minimal change as would views from Laurel Street (looking east).

REUSE OF EXISTING BUILDING

The footprint of the office building would remain the same as under existing conditions. Unlike the proposed project or project variant, the glass curtain and painted aluminum window wall system would be replaced in kind for the continued office use (i.e., full height curtain wall glazing with large panes of glass or with spandrels below and mullions and muntins). One floor of additional usable office space would be added. The building’s auditorium space would be retained as an amenity for the project.



Source: Laurel Heights Partners, LLC (2018)

3333 CALIFORNIA STREET MIXED-USE PROJECT

2015-014028ENV

FIGURE 6.2: ALTERNATIVE B: FULL PRESERVATION - OFFICE ALTERNATIVE SITE PLAN

As with the proposed project or project variant, the office building's 13-foot-tall mechanical equipment rooms would be relocated/removed to accommodate a vertical addition. The one-story vertical addition would increase the height of the office building from 55 feet 6 inches to 66 feet 8 inches. The addition would be set back 15 feet from the east, west, and south sides of the existing office building; would have a contemporary design with steel and glazing, and would be visually subordinate in relation to the overall size of the existing building.

With the vertical addition to the existing office building and the retention of the annex building, there would be a total of 406,459 gross square feet of office uses under Alternative B (or 30,459 more gross square feet of office use than under existing conditions, 356,460 more gross square feet than under the proposed project and 406,459 more gross square feet than under the project variant) (see Table 6.1 on pp. 6.13-6.15).

NEW CONSTRUCTION

The Plaza B and Walnut buildings would have different land uses, building footprints, and building heights compared to the proposed project or project variant. These new residential buildings would have no ground-floor retail along California Street or daycare uses as they would with the proposed project. (See Chapter 2, Project Description, Figures 2.3 and 2.32, pp. 2.5 and 2.102, respectively, and Figure 6.2, p. 6.30. See Figure 6.3: Alternative B: Full Preservation - Office Alternative Building Massing for proposed building massing on the project site from different locations around the site.)

The Plaza B and Walnut buildings along California Street would have a total of 187,668 gross square feet of residential use with 167 residential units. Unlike the proposed project or project variant, they would have no ground floor or pedestrian presence along California Street because the north edges of both buildings would be set back from the north property line to retain the brick wall along California Street. The L-shaped footprint of the Plaza B Building would be reoriented to preserve the main Walnut Street entrance and the curvilinear shape of the internal roadways and landscaped pathways on the north portion of the site. The Walnut Building's footprint would be reduced, allowing the retention of the northerly extension of the east wing of the office building, the circular parking garage ramp structures, the exposed concrete piers over the garage, and some of the open area, mature trees, and landscaping. The Plaza B and Walnut buildings would be 60 feet tall (the Plaza B Building would be 15 feet taller than under the proposed project or project variant, and the Walnut Building would be 15 feet taller than under the proposed project and 7 feet shorter than the project variant).

SITE ACCESS AND PARKING

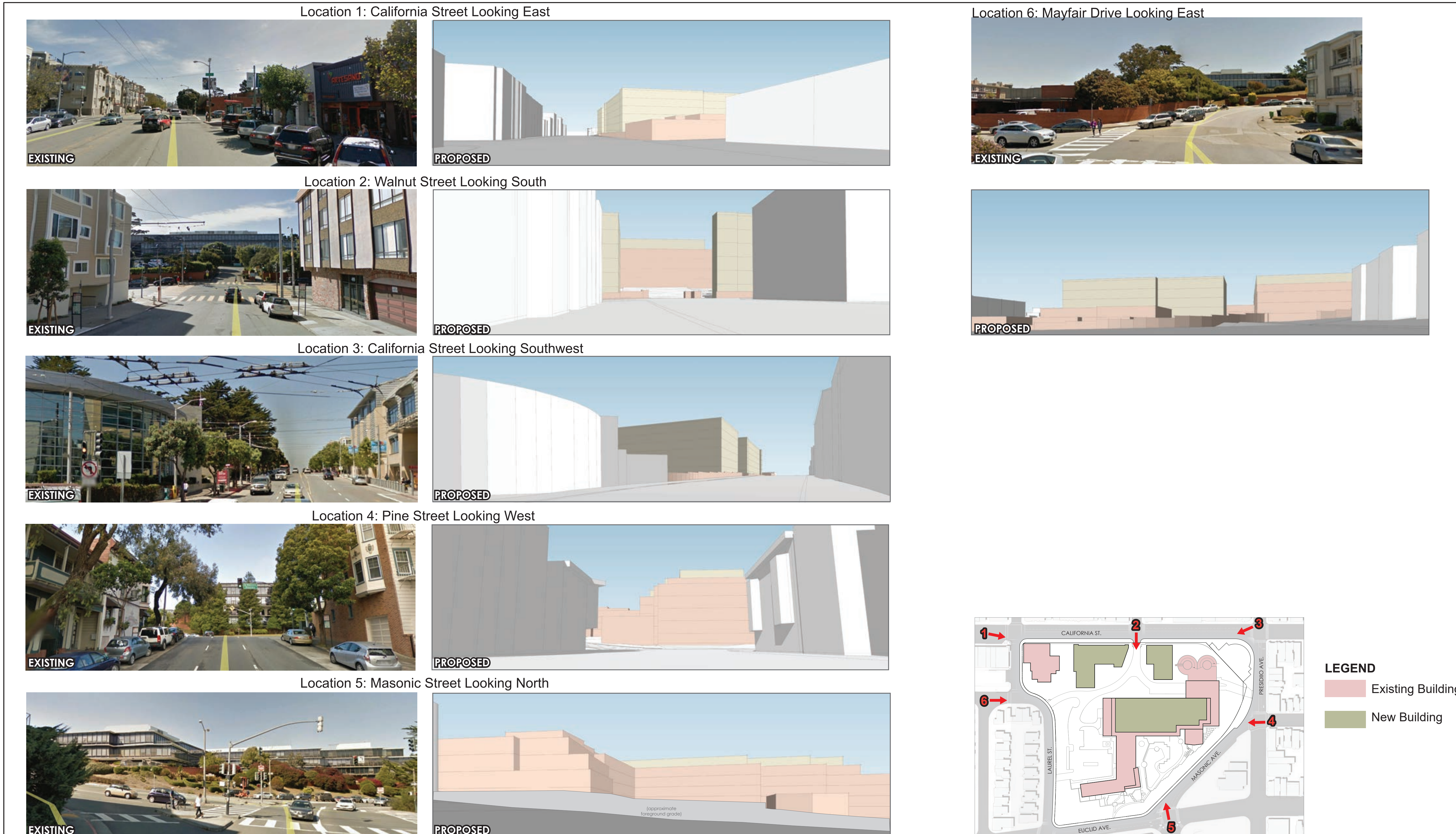
PARKING AND CIRCULATION

With Alternative B, one new below-grade parking garage (the California Street Garage) would be constructed. The California Street Garage would have two levels of below-grade parking rather than the two to three levels in the proposed project or project variant. The parking garage under the existing office building would be retained. (See Figure 6.4: Alternative B: Full Preservation - Office Alternative Site Access, for site and garage access points and the footprint of the retained and proposed parking garages.) The parking program for Alternative B would retain 102 of the 331 existing surface parking spaces on the project site; the remaining 229 surface parking spaces would be replaced by spaces in the new California Street Garage. The 212 parking spaces in the existing garage would be retained. Overall, there would be 765 off-street parking spaces: 167 spaces for residential uses, 585 spaces for office uses, and 13 car-share spaces. Thus, Alternative B would provide 131 fewer parking spaces than the proposed project and 205 fewer spaces than the project variant. Except for spaces in the retained surface parking lots, off-street parking (663 spaces) would be in the California Street Garage and the retained parking garage.

The curb cuts would remain the same as under existing conditions, with access to the site from California Street, Laurel Street (two points of access), and Presidio Avenue. Unlike the proposed project or project variant, vehicles would enter and exit the California Street Garage from the following access points:

- An entry/exit garage ramp on the west side of the Walnut Building accessed via the Walnut Street extension into the project site.
- The retained entry/exit garage ramps on the east side of the Walnut Building, which would lead to Basement Level B2 of the California Street Garage and the retained parking garage under the existing office building.
- An entry/exit garage ramp on the south side of the Plaza B Building accessed from the curvilinear internal roadway via Laurel or Walnut streets.

Alternative B would eliminate fewer on-street vehicle parking spaces than the proposed project or project variant would, because there would be no new curb cuts and fewer spaces would be converted to freight or passenger loading spaces. Overall, there would be a net reduction of five on-street parking spaces compared to existing conditions due to the new 100-foot-long commercial loading zone along California Street (31 fewer than under the proposed project or project variant). Emergency vehicles would continue to have access to the site via the existing Walnut Street and Laurel Street driveways.



Source: Laurel Heights Partners, LLC (2018)

FIGURE 6.3: ALTERNATIVE B: FULL PRESERVATION - OFFICE ALTERNATIVE BUILDING MASSING

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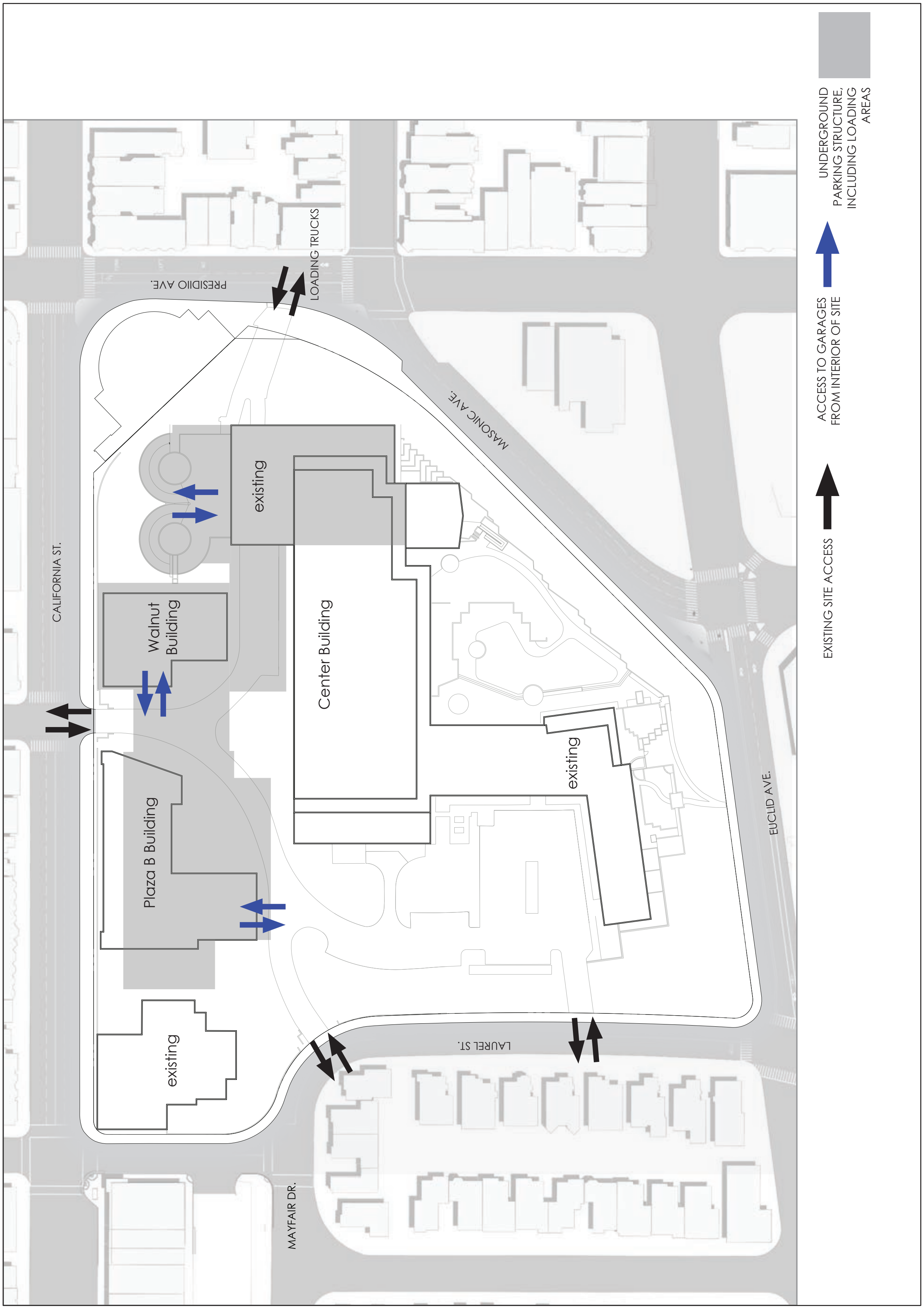

Source: Laurel Heights Partners, LLC (2018)

3333 CALIFORNIA STREET MIXED-USE PROJECT

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FIGURE 6.4: ALTERNATIVE B: FULL PRESERVATION - OFFICE ALTERNATIVE SITE ACCESS

PEDESTRIAN CIRCULATION

Unlike the proposed project or project variant, the project site would not be fully integrated with the existing street grid under Alternative B. Although access from Walnut Street would be the same as under existing conditions, the extension of Walnut Street into the project site terminating in a roundabout would not be developed. Pedestrians would be able to walk onto the project site from California and Walnut streets, and onto the surface parking lots through the two Laurel Street entrances. However, pedestrians would not be able to walk through the site to Presidio, Masonic, or Euclid avenues because the east-west Mayfair Walk and north-south Walnut Walk would not be developed with this alternative. Pedestrian access from California Street would be limited compared to the proposed project and project variant due to the retention of the 10-foot-tall perimeter wall. Access to the green lawn at the corner of Laurel Street and Euclid Avenue would be as under existing conditions, without improvements beyond general maintenance and upkeep.

FREIGHT AND PASSENGER LOADING PROGRAM

Unlike the proposed project or project variant, no new off-street commercial and residential freight loading spaces would be developed under Alternative B. The five loading spaces along the west side of the existing office building would be retained.

Commercial Freight Loading: Commercial freight loading activities would occur at the existing off-street freight loading area in the existing office building and would serve all office tenants via service corridors, elevators, and internal stairs. As with the proposed project or project variant, the project sponsor would request from the SFMTA the conversion of five on-street parking spaces on the south side of California Street near Laurel Street to create one 100-foot-long commercial loading zone.

Passenger Loading: The project sponsor would not seek the conversion of 10 on-street parking spaces into three separate 60-foot-long passenger loading zones because passenger loading would occur at the retained surface parking lot and/or along the internal roadway. Thus, under Alternative B, 10 fewer on-street spaces would be converted to commercial freight or passenger loading zones.

Residential Move-In and Move-Out Loading: Residential move-in and move-out loading activities for the new buildings would occur from the retained surface parking lot on the west side of the site near Laurel Street and from existing on-street parking spaces along California or Laurel streets (with a special time-limited permit from the SFMTA for use of existing on-street parking spaces).

Trash/Waste Pick-up: Similar to existing conditions, all deliveries for trash/waste pick-up would occur in the five freight loading spaces in the existing off-street freight loading dock.

STREETSCAPE CHANGES

As with the proposed project or project variant, Alternative B would include proposed sidewalk widening along Presidio Avenue, Masonic Avenue, Euclid Avenue, and Laurel Street. No other streetscape changes would be implemented under Alternative B. Site development under Alternative B would comply with the Urban Forestry Ordinance similar to the proposed project or project variant; and the removal of significant trees would require application and approval of a permit from public works.

CONSTRUCTION

Alternative B would be constructed in approximately two years, with excavation and site preparation for construction of the Plaza B and Walnut buildings and the California Street Garage and alterations to the existing office building occurring as part of a single phase (5 to 13 years less than the proposed project or project variant). As with the proposed project or project variant, excavation under Alternative B would encounter bedrock (including naturally occurring asbestos in serpentinite). Site disturbance would occur in an area of known soil and groundwater contaminants from past uses. Thus, site redevelopment would be conducted pursuant to a required site mitigation plan.

ABILITY TO MEET PROJECT OBJECTIVES

Alternative B would meet most of the basic project objectives, although in most cases to a lesser degree than would the proposed project or project variant. Alternative B would redevelop a large underutilized commercial site, but to a lesser degree and with a limited mix of uses, reducing walkability and convenience because no onsite daycare and retail uses would be provided (Objectives 1 and 2). This alternative would increase the City's housing supply (Objective 3) with 167 residential units, but to a significantly lesser extent than the proposed project or project variant, with 391 fewer units than the proposed project and 577 fewer than the project variant. Alternative B would not open and connect the site to the surrounding community because it would not construct the Walnut and Mayfair walks and thus would not extend the neighborhood urban pattern and surrounding street grid into the site; therefore, it would not meet Objective 4. This alternative would not provide active ground floor retail uses or activated neighborhood-friendly spaces along the adjacent streets, and therefore would not achieve Objective 5. Alternative B would provide a high quality and varied architectural and landscape design, utilizing the site's topography and other unique characteristics (Objective 6). Alternative B would construct some open spaces and retain some of the existing open space all of which would be usable by project residents and surrounding community members and would therefore achieve Objective 7. Alternative B would partially meet Objective 8 by providing code-required open space; however, open space would not be as varied or designed to maximize pedestrian accessibility. It would include sufficient off-street parking to meet the project's needs

(Objective 9), and it would retain and integrate the existing office building into the development (Objective 10).

IMPACTS OF ALTERNATIVE B: FULL PRESERVATION – OFFICE ALTERNATIVE

CULTURAL RESOURCES (HISTORIC ARCHITECTURAL RESOURCES)

Approach

The determination that the property at 3333 California Street is a historical resource under CEQA was not premised on its individual components, but on its unique combination of character-defining building and site and landscape features which, when considered together, constitute a Midcentury Modern-designed corporate campus.

The historic preservation approach for Alternative B was developed in response to the information presented in the National Register Nomination form. Alternative B focused on retaining all of the character-defining features of the building and most of the site and landscape as well as other non-historic features and continuing the historic office use. (See summary below for the disposition of the character-defining features under Alternative B, and Figure 6.2, p. 6.30). Views of the most prominent character-defining features of the property, from the east on Pine Street (looking west) and from the south on Masonic Avenue (looking north), would be retained with minimal change as would views from Laurel Street (looking east).

Retention of Character-Defining Features

The disposition of the character-defining features under Alternative B is as follows:

Character-Defining Features	Level of Retention (Alternative B)
Existing Office Building	**Retained**
Stepped multi-story massing built into the natural topography of the site	Retained
Office building encompassing three distinct building phases that have all taken on significance	Retained
Midcentury Modern architectural style with little ornamentation	Retained
Flat, cantilevered roof with projecting eaves	Retained
Continuous full-height, slightly recessed curtain wall glazing on most sides and along all levels of the building	Replaced in-kind for continued office use
Glass curtain wall composed of bronze powder-coated aluminum framing system in a regularly spaced pattern of mullions and muntins, typically with a small spandrel panel of obscure glass below a larger pane	Replaced in-kind for continued office use

(continued)

Character-Defining Features	Level of Retention (Alternative B)
Site and Landscape	**Retained**
Corporate campus setting featuring an office building located on a large, open landscaped site across 10.25 acres	Mostly retained, development limited to two new buildings on the surface parking lots on the northern portion of site
Landscape utilizing curvilinear shapes in pathways, driveways, and planting areas; and other integrated landscape features (planter boxes, seating)	Retained
– *elements near northern and western portions of the project site near the east wing of the office building and Mayfair Drive*	– *Removed with development of Plaza B and Walnut buildings*
– *elements of the private courtyard/landscaped areas on south and east sides of the existing office building*	– *Retained*
– *open space/sloped lawn on Laurel Street*	– *Retained*
– *open space/lawn at Presidio and Masonic avenues*	– *Retained*
Main entrance leading from Walnut and California streets	Retained
Brick perimeter walls, integrated planter boxes, and retaining walls of reinforced concrete and clad in stretcher bond pattern	Retained
– *Perimeter brick wall that borders north and west (partial) boundaries of project site*	– *Retained with development of Plaza B and Walnut buildings*
– *Brick retaining walls in the private courtyard/landscaped areas on south and east sides of existing office building*	– *Retained*
Mature trees around the corporate modern campus	Mostly retained, with removal of some mature trees along northern portion of site
Open area along Euclid Avenue and Laurel Street	Retained
Concrete pergola atop terraced planting facing Laurel Street	Retained

Changes to the existing office building would be limited to the in-kind replacement of the curtain wall glazing with large panes of glass or with spandrels below and mullions and muntins, the removal of the existing mechanical penthouse, and construction of a one-story addition. The building's footprint would remain the same, and all of its structural elements and floor plates would be retained or replaced in-kind. The proposed addition would replace the mechanical penthouse level; be flush with the north façade of the office building, and set back 15 feet from the east, west, and south façades of the office building. Overall, the proposed addition would increase the height of the existing office building; however, when viewed from the street level, the vertical addition would appear visually subordinate to the historic portion of the office building. Alternative B would retain the majority of the site in its existing condition, e.g., the grass lawn extending east from Laurel Street and Euclid Avenue to Masonic Avenue and private courtyards, and, unlike the proposed project or project variant, would retain more of the project site as open space including retention of the existing courtyards on the south and east sides of the building.

Alternative B would also include construction of the Plaza B and Walnut buildings and retention of the annex building, the northerly extension of the east wing of the office building, the exposed concrete piers above the garage, the circular garage ramp structures, and some of the site and landscape features on the northeast portion of the site. Changes to the site and landscape features would be concentrated on the northern portion of the site where the surface parking lots are located, while existing conditions on the southern and eastern portions of the site would be maintained.

Summary of Ability to Meet Secretary of Interior's Standards for Rehabilitation

As described above, Alternative B would retain all of the character-defining features of the existing office building and most of the character-defining features of the site and landscape. The relevant rehabilitation standards are discussed below with a short explanation regarding the alternative's ability to meet the standard. In general, the rehabilitation and adaptive reuse of the office building under Alternative B would conform with the Secretary's Standards.

Rehabilitation Standard 1 states that the "property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces and spatial relationships." As described above, under Alternative B the historic office use would be continued and there would be minimal changes to the building; a single-story vertical addition and in-kind replacement of the glass curtain window wall system. Although two new buildings with residential uses would be introduced on the northern portion of the site along California Street, the reorientation of the building's footprints and setbacks from the north property line would allow for the retention of elements of the site's open areas that create the corporate campus environment. All other historic site and landscape features would be retained. Thus, when considered together the changes to the building, site and landscape features would be limited and would generally conform with Rehabilitation Standard 1.

Rehabilitation Standard 2 states that the "historic character of a property shall be retained and preserved," and "removal of historic materials or alteration of features and spaces that characterize a property shall be avoided." Rehabilitation Standard 5 states that "distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a historic property shall be preserved." Under Alternative B the modifications to the existing building would be minor and would not alter the building's historic footprint. All of the existing office building's character-defining features, including the stepped multi-story massing built into the natural topography of the site; the multi-wing footprint; the Midcentury Modern architectural style with little ornamentation; and the flat cantilevered roof with projecting eaves would be retained; and the glass curtain wall system would be replaced in-kind. Additionally, new infill construction would be restricted to the northern portion of the site and would result in limited demolition of some of the curvilinear shapes in pathways, driveways, and planting areas and the removal of some mature trees. Thus, when considered together the limited changes to the building, site and landscape features would generally conform with Standards 2 and 5.

Rehabilitation Standard 9 states that "new additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property," and "new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property." Under Alternative B, as described above, the glass curtain wall system would be replaced in-kind; and the size, scale, materials, and design of the exterior alterations, i.e., the new rooftop addition, would distinguish it from the original building yet be compatible with Midcentury Modern design principles. Limited demolition would not alter the building's general form or massing. Additionally, new infill construction would demolish some of the curvilinear shapes and hardscape features of the site and landscape on the northern portion of the property; but new infill construction would not obscure the most prominent views of the property's character-defining features from the east and from the south when viewed from these directions. The essential character of the Midcentury Modern corporate campus would be retained. Thus, when considered together, the changes to the building, site and landscape features would generally conform with Standard 9.

Rehabilitation Standard 10 states that "new additions and adjacent or related new construction shall be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired." Under Alternative B, the limited demolition associated with the rooftop addition and development of two new buildings would not represent an irreversible change to the essential form and integrity of the building, site, and landscape. When considered together with new construction, which would remove some of the character-defining features of the site and landscape, the essential form and integrity of the Midcentury Modern designed corporate campus and its environment would be able to be restored to its previous state with removal of the two new buildings and the rooftop addition in the future. Therefore, Alternative B would be in general conformance with Standard 10.

Conclusion

Alternative B would continue the office use and retain all of the character-defining features of the existing office building, including the stepped multi-story massing; the multi-wing footprint; the Midcentury Modern architectural style with little ornamentation; the flat cantilevered roof with projecting eaves; and the varied glass curtain wall and framing system. Alternative B does not include demolition that would change the footprint of the existing building. The rooftop addition and replacement of existing mechanical penthouse in tandem with its setbacks would not result in a substantial change to the building's massing. The rooftop addition would have a contemporary design which would distinguish it from the original building, while steel and glazing materials would make it compatible with the original building.

Alternative B would introduce two new buildings to the project site (11 fewer than under the proposed project or project variant). The new construction would require minimal changes to the distinctive materials, features, spaces, and spatial relationships of the site. However, changes on the northern portion of the site would affect some of the character-defining site and landscape features.

Because Alternative B would retain all of the character-defining features of the existing office building and most of the site and landscape features, the property would continue to convey its significance overall. Alternative B would not result in substantial changes to the massing and materiality of the office building or the relationship between the building and the site and landscape. The changes to the subject property would not affect character-defining features of the property such that the significance of the historical resource would be "materially impaired" under CEQA Guidelines section 15064.5(b)(2).

Under Alternative B, the project site would continue to convey its historic and architectural significance as a Midcentury Modern-designed corporate campus. As such, Alternative B would not cause a substantial adverse impact on the historic resource at 3333 California Street. Mitigation Measure M CR-1a: Documentation of Historical Resource and Mitigation Measure M-CR-1b: Interpretation of the Historical Resource (pp. 4.B.45-4.B.46) would not be required for Alternative B.

Off-Site Historic Resources

As with the proposed project or project variant (see Impact CR-2, pp. 4.B.47-4.B.48), Alternative B, with more limited development, would have a less-than-significant impact on off-site historic architectural resources. This is because the significance of nearby historic resources is not premised on their having a contextual or architectural relationship with the Midcentury Modern-designed corporate campus at the project site, including the California Laurel Village Shopping Center.

Cumulative Impacts

Cumulative projects would not combine to generate significant cumulative historic architectural resource impacts that would affect the property at 3333 California Street or other historic resources in the project vicinity. This is due to distance and the fact that historically associated structures or site and landscape features are not present on these project sites. Like the proposed project or project variant, Alternative B, with more limited development, would not generate a significant cumulative impact because the cumulative projects within the vicinity of the project site would not combine with impacts of this alternative to result in significant cumulative historic architectural resource impacts (see Impact C-CR-1, pp. 4.B.48-4.B.50).

TRANSPORTATION AND CIRCULATION

Trip Generation

The travel demand for Alternative B was estimated for weekday daily and weekday a.m. and p.m. peak periods using the same approach and methodology as for the proposed project and project variant. A summary of the resulting external vehicle trips is shown in Table 6.5: Alternative B Vehicle-Trip Generation Comparison – External Trips.

As shown above in Table 6.2, p. 6.16, Alternative B would generate 659 external person-trips during the weekday a.m. peak period: 360 auto person-trips (255 vehicle trips), 202 transit trips, 75 walk trips, and 22 trips by other modes. During the weekday p.m. peak period, Alternative B would generate 710 external person-trips: 388 auto person-trips (275 vehicle trips), 218 transit trips, 80 walk trips, and 25 trips by other modes.

Table 6.5: Alternative B Vehicle-Trip Generation Comparison – External Trips

	Daily NOTE A	Weekday AM Peak Hour	Weekday PM Peak Hour
Alternative B	2,343	255	275
Proposed Project	5,760	691	752
Difference NOTE B	-3,417 or 59.3% reduction	-436 or 63.1% reduction	-477 or 63.4% reduction
Alternative B	2,343	255	275
Project Variant	5,744	726	804
Difference NOTE B	-3,401 or 59.2% reduction	-471 or 64.9% reduction	-529 or 65.8% reduction

Notes:
A The weekday AM peak hour internal trip rate was applied to the daily person-trips to estimate the number of external vehicle trips.
B Total reflects external vehicle trips.

Source: *SF Guidelines*, 2002; Kittelson & Associates, Inc, 2018; *3333 California Travel Demand Memo*, March 2018

As shown Table 6.5, Alternative B would result in fewer vehicle trips compared to the proposed project and project variant during the weekday a.m. and p.m. peak periods, and as a result would have reduced operational effects compared to those described for the proposed project or project variant.

Construction Transportation

Unlike the proposed project and project variant, Alternative B would be constructed in one phase over two years. Because of its reduced construction program and the shorter duration of construction activities compared to the proposed project and project variant, Alternative B would result in fewer and less substantial construction effects, and like the proposed project and project variant, would also result in less-than-significant construction-related transportation impacts.

Improvement Measure I-TR-1: Project Construction Updates, p. 4.C.74, could be implemented for Alternative B to further reduce the less-than-significant impact.

Operational Transportation Impacts

VMT Impacts

The average daily vehicle miles traveled per capita for the residential use and per employee for the retail use proposed in Alternative B would be the same as for those uses under the proposed project and project variant. Within the transportation analysis zone (TAZ) 709 that the project site is located in, the existing average daily VMT per capita for residential uses, or per employee for retail and office uses, are more than 15 percent below the existing and future regional averages. The analysis also compares the provision of parking for Alternative B residential and other non-residential (office) uses with the neighborhood parking rate. The residential parking rate accounts for residential units in TAZ 709 and other nearby TAZs (within three-quarters of a mile based on walking distance) with more distant land use and parking given decreasing weight. The retail and other non-residential parking rate accounts for parking associated with retail and other non-residential uses along California and Sacramento streets near the project site.[12] This information is presented in Table 6.6: Alternative B Parking Rate Summary.

As shown in Table 6.6, Alternative B would provide parking for residential uses at the same rate as under the proposed project and project variant. Alternative B would not include retail land uses or associated parking. Alternative B would provide other non-residential parking at the same rate as under existing conditions (1.44 spaces per 1,000 square feet) and at a lower rate than the proposed project and project variant. For the proposed project or project variant, the VMT impact was determined to be less than significant with mitigation; under Alternative B, the VMT impact would be less than significant without mitigation. Therefore, Mitigation Measure M-TR-2: Reduce Retail Parking Supply, p. 4.C.80, would not apply.

Traffic Hazard Impacts

As discussed above, Alternative B would result in about 63 and 66 percent fewer vehicle trips as compared to the proposed project and project variant during the weekday a.m. and p.m. peak periods, respectively. Unlike the proposed project and project variant, under Alternative B, the curb cuts would remain exactly the same as under existing conditions, with access to the site from California Street, Laurel Street (two points of access), and Presidio Avenue. As a result, Alternative B would result in reduced operational effects compared to those described for the proposed project or project variant under Impact TR-3, pp. 4.C.81-4.C.83, and traffic hazard

[12] Planning department staff reviewed assessor and planning department records and street view/aerial photos to estimate off-street parking associated with retail uses along California and Sacramento streets near the project site to derive the appropriate neighborhood parking rate for this analysis.

impacts under Alternative B would be less than significant. Implementation of Improvement Measure I-TR-3: Driveway Queue Abatement, p. 4.C.82, to further reduce the less-than-significant traffic hazard impacts under Alternative B, would not be necessary as there would be no project driveways that could result in queuing in the public rights-of-way.

Table 6.6: Alternative B Parking Rate Summary

Scenario/Land Use	Size	Vehicle Parking Spaces	Existing Neighborhood Parking Rate	Proposed Parking Rate	Change from Existing
Alternative B					
Residential	167 units	167	0.90	1.00	11%
Retail	0 gross square feet	0	1.55	-	-
Other Non-residential	406,459 gross square feet	585	1.44	1.44	0%
Proposed Project					
Residential	558 units	558	0.90	1.00	11%
Retail	54,117 gross square feet	198	1.55	3.66	136%
Other Non-residential	64,689 gross square feet	129	1.44	1.99	38%
Project Variant					
Residential	744 units	744	0.90	1.00	11%
Retail	48,593 gross square feet	188	1.55	3.87	150%
Other Non-residential	14,650 gross square feet	29	1.44	1.98	37%

Notes: The existing parking rate for residential uses reflects data for TAZ 709. The existing parking rate for retail and other non-residential uses reflects data from California Street and Sacramento Street, as provided by the planning department. The retail (retail, restaurant, and commercial) land use category for the proposed project and project variant includes the proposed 60 public parking (commercial) spaces on the project site. Car-share spaces are not included in the parking rate calculation.

Neighborhood Parking Rates:
Residential Parking Rate = 0.9 space/unit (neighborhood)
Retail Rate = 1.55/1,000 square feet (California and Sacramento)
Other Non-Residential Rate = 1.44/1,000 square feet (existing site)

Source: Kittelson and Associates, Inc. 2018; San Francisco Planning Department, 2018.

Transit Impacts

As shown in Table 6.2, p. 6.16, Alternative B would generate 202 transit trips in the a.m. peak period and 218 transit trips in the p.m. peak period. Alternative B would generate 93 (32 percent) and 112 (34 percent) fewer transit trips than the proposed project during the weekday a.m. and p.m. peak periods, respectively. Alternative B would generate 122 (38 percent) and 174 (44 percent) fewer transit trips than the project variant during the weekday a.m. and p.m. peak periods, respectively.

With the addition of transit trips generated by Alternative B, the 43 Masonic bus route would exceed Muni's capacity utilization standard of 85 percent during the weekday a.m. peak hour. Alternative B would add 9 riders to the 43 Masonic and, as with the proposed project and project variant, would result in adverse impacts on the 43 Masonic by increasing ridership to exceed the

85 percent capacity utilization during the weekday a.m. peak period under baseline conditions, although to a lesser degree. Therefore, similar to the proposed project and project variant, Alternative B would have a significant impact on an individual Muni line and mitigation would be required. Implementation of Mitigation Measure M-TR-4: Monitor and Provide Fair Share Contribution to Improve 43 Masonic Capacity, pp. 4.C.87-4.C.88, would reduce the impact to less-than-significant levels. Under Alternative B a fair share contribution of $109,900[13] would be conveyed to the SFMTA when monitoring, funded by the project sponsor beginning upon completion and occupancy of the first development phase, shows that capacity utilization has exceeded 85 percent. Similar to the proposed project or project variant, the SFMTA's ability to provide additional capacity or improve transit headways is uncertain; thus, the impact would remain significant and unavoidable after mitigation.

The proposed project and project variant would have less-than-significant impacts on regional transit routes. Since the number of peak hour transit trips on regional carriers would be lower for Alternative B compared to the proposed project and project variant, the impact of Alternative B would continue to be less than significant.

Pedestrian Impacts

Pedestrian access to the site under Alternative B would be similar to existing conditions with a limited number of site access points for pedestrians. Alternative B would include sidewalk widening along Presidio, Masonic, and Euclid avenues, and Laurel Street. However, unlike the proposed project or project variant, the project site would not be fully integrated with the existing street grid. Construction of the streetscape changes at Masonic Avenue/Presidio Avenue/Pine Street, including the elimination of the southbound slip lane and striping a new crosswalk at the north leg of this intersection; at Masonic Avenue/Euclid Avenue (including the elimination of the westbound slip lane); and at Laurel Street/Mayfair Drive (including the corner bulbout and crossing) would not occur. Additionally, Walnut Street would not be extended into the site and the east-west Mayfair Walk and north-south Walnut Walk would not be developed. Corner bulb-outs at select intersections would not be constructed under Alternative B.

As shown in Table 6.2, p. 6.16, Alternative B would generate about 277 pedestrian trips (202 walk trips and 75 transit trips) in the a.m. peak hour and 298 (218 walk trips and 80 transit trips) in the p.m. peak hour. This would be approximately 59 to 62 percent fewer pedestrian trips than the proposed project or project variant during weekday a.m. and p.m. peak hours. Therefore, overcrowding on public sidewalks would not occur.

[13] See EIR Appendix G: Alternatives Analysis – Transportation and Circulation, Attachment A, Transit Capacity Analysis and Fair Share Contribution Calculations, p. 104.

Alternative B would generate fewer vehicle trips and fewer pedestrian trips than the proposed project and project variant; therefore, the alternative would also not substantially alter traffic operations to create potentially hazardous conditions for pedestrians. Thus, pedestrian impacts under Alternative B, as with the proposed project or project variant, would be less than significant. Implementation of Improvement Measure I-TR-3: Driveway Queue Abatement, p. 4.C.82, to further reduce the less-than-significant traffic hazard impacts, would not be needed as there would be no project driveways that could result in queuing in the public rights-of-way, including sidewalks.

Bicycle Impacts

Under Alternative B, bicycle circulation to and through the site would be similar to existing conditions. Thus, bicycle accessibility would be limited compared to the proposed project or project variant.

Alternative B would generate fewer vehicle trips than the proposed project and project variant. As a result, changes in local traffic operations would not be as substantial and the potential to create hazardous conditions for bicyclists would be reduced compared to the proposed project's and project variant's less-than-significant bicycle impacts. Implementation of Improvement Measure I-TR-3: Driveway Queue Abatement, p. 4.C.82, to further reduce the less-than-significant impacts on bicyclists under Alternative B, would not be needed as there would be no project driveways that could result in queuing in the public rights-of-way creating potentially hazardous conditions as under the proposed project and project variant.

Loading Impacts

FREIGHT LOADING

As under the proposed project and project variant, Alternative B would generate an average and peak hour demand of five and six freight loading spaces, respectively. The existing five loading spaces would be retained and the conversion of five on-street parking spaces to one 100-foot-long on-street commercial loading zone on California Street would be requested. The supply would meet peak hour demand of six freight loading spaces. As with the proposed project and project variant, the freight loading impact would be less than significant. Similarly, implementation of Improvement Measure I-TR-9a: Schedule and Coordinate Deliveries and Improvement Measure I-TR-9b: Monitor Loading Activity and Implement Loading Management Strategies as Needed, pp. 4.C.97-4.C.98, would further reduce the less-than-significant freight loading impacts.

PASSENGER LOADING

Alternative B would generate 22 passenger drop-off/pick-up trips (17 drop-off, 5 pick-up) during the weekday a.m. peak hour and 25 passenger drop-off/pick-up trips (7 drop-off, 18 pick-up) during the weekday p.m. peak hour. This demand is equivalent to 40 linear feet (or 2 spaces) during the peak hour of demand. Unlike the proposed project or project variant, under Alternative B the project sponsor would not seek the conversion of on-street parking spaces into passenger loading zones. Passenger loading would occur along interior roadways and in the retained surface parking lot along Laurel Street. As with the proposed project and project variant, the supply would meet demand and the passenger loading impact would be less than significant.

Emergency Access Impacts

Under Alternative B emergency vehicles would continue to have access to the perimeter and interior of the project site to provide emergency services such as fire protection for the proposed new buildings along California Street and the rehabilitated building at the center of the site. They would be able to access the site via the Walnut Street entrance, driveways along Laurel Street (at Mayfair Drive and north of Euclid Avenue), and Presidio Avenue. As with the proposed project and project variant, emergency access impacts would be less than significant.

Cumulative Impacts

Compared to the proposed project and project variant, Alternative B would have a smaller construction program and land use program. Alternative B would contribute less to any cumulative construction-related transportation impacts in combination with past, present and reasonably foreseeable development in the project vicinity, and this cumulative impact would therefore remain less-than-significant. In addition, operational impacts related to vehicle miles traveled, traffic hazards, transit, pedestrians, bicycles, loading, and emergency access would not combine with operational transportation impacts from other past, present or reasonably foreseeable projects to result in significant cumulative impacts under 2040 conditions.

NOISE AND VIBRATION

Under Alternative B there would be less demolition, ground disturbance, and construction on the northern portion of the project site along California Street and at the center of the site, and no change to existing conditions on the southern portion of the project site fronting Laurel Street, Euclid Avenue, and Masonic and Presidio avenues (see Figure 6.4, p. 6.35, and Figure 2.22, p. 2.52).

Construction Noise

Under Alternative B, the two-year construction program would be 5 to 13 years shorter than that for the proposed project or project variant and would be completed in a single phase; however, the type of construction equipment and use characteristics would not change because demolition, excavation, and construction activities, even though more limited, would still occur. Under Alternative B, unlike the proposed project or project variant, buildings would not be under construction on the site while others constructed in earlier phases would be occupied. Therefore, construction noise impacts on on-site sensitive receptors do not need to be evaluated.

As identified for the proposed project or project variant, temporary construction-related noise impacts at off-site sensitive receptor locations along California Street, Euclid Avenue, and Laurel Street (see Impact NO-1, pp. 4.D.37-4.D.47) would be significant when the loudest pieces of construction equipment operate simultaneously; this would generate noise increases of 10 dBA over ambient levels along California Street, 16 dBA along Euclid Avenue, 17 dBA along Laurel Street, and 5 dBA along Presidio Avenue. With a construction program limited to the northern portion of the site and a shorter, single-phase construction schedule, the number of temporary construction-related noise events that could affect off-site sensitive receptor locations would be reduced from those under the proposed project or project variant. However, construction activities would be similar, e.g., the use of excavators with hoe rams to fracture and remove bedrock as part of the excavation for the California Street Garage. Therefore, the potential to generate substantial temporary and periodic noise increases of at least 10 dBA or greater increase over ambient noise levels at off-site locations would remain. Thus, under Alternative B, off-site sensitive receptors along the north side of California Street would be exposed to noise levels similar to those that would be generated under the proposed project or project variant while the off-site sensitive receptors along the west side of Laurel Street would be exposed to similar, but slightly lower, noise levels due to less construction along Laurel Street and the south side of the project site. In contrast, the off-site sensitive receptors along the east side of Presidio Avenue and along the south side of Euclid Avenue would not be as directly exposed to the temporary, construction-related noise increases because of the greater distance from, and the more limited nature of, the construction activities. However, as a result of the proximity of construction activities to off-site sensitive receptors along California and Laurel streets, the nature of the construction activities, and the potential for encountering bedrock, construction noise impacts under Alternative B (although more limited in terms of the number of noise events) would be significant and implementation of Mitigation Measure M-NO-1: Construction Noise Control Measures (see pp. 4.D.42-4.D.43) would be required.

As with the proposed project or project variant, construction noise impacts under Alternative B would remain significant and unavoidable with implementation of Mitigation Measure M-NO-1. Although the construction noise reduction strategies identified under Mitigation Measure M-NO-1 would not reduce the construction noise impact at off-site locations to a less-than-significant level, the measure would further reduce the less-than-significant noise impacts related to compliance with local standards for construction noise from non-impact equipment.

With a more limited construction program and shorter construction schedule, there would be less excavated material hauled off-site, less concrete used, and less material delivered to the site, resulting in fewer haul/concrete/delivery truck trips under Alternative B than the proposed project or project variant. Thus, construction-related noise attributable to construction truck traffic on local roadways would be reduced, and, like the proposed project or project variant, would be a less-than-significant impact.

Construction Vibration

Under Alternative B, as with the proposed project or project variant, construction activities that generate groundborne vibration would occur, e.g., the use of excavators and vibratory rollers, and the potential for structural damage to adjacent structures would remain. Unlike the proposed project or project variant, the excavation and other construction activities for the California Street Garage would not extend to the edge of the adjacent SF Fire Credit Union building. Thus, construction-related groundborne vibration impacts on the SF Fire Credit Union Building would be less than significant because the distance of the construction activities from the structure would be 8 feet or greater (see Table 4.D.17, p. 4.D.55). As such, construction-related groundborne vibration impacts under Alternative B would be reduced from those under the proposed project or project variant and Mitigation Measure M-NO-2: Vibration Monitoring Program for SF Fire Credit Union Building (see pp. 4.D.55-4.D.56) would not be required.

Operational Noise

Stationary Equipment

Under Alternative B, the emergency diesel generator that serves the existing office building would not be removed from its current location in Basement Level 1 and a new emergency diesel generator would not be needed. Heating, ventilation, and air conditioning (HVAC) equipment for the Plaza B and Walnut buildings would be located on the rooftops and could result in significant noise impacts. As with the proposed project or project variant, Mitigation Measure M-NO-3: Stationary Equipment Noise Controls (see p. 4.D.60) would still be required under Alternative B for any rooftop equipment to reduce this impact to a less-than-significant level.

Traffic

As shown in Table 6.5, p. 6.43, the reduced land use program in Alternative B would generate 3,417 fewer vehicle trips per weekday than the proposed project and 3,401 fewer vehicle trips per weekday than the project variant (a 59 percent reduction relative to the proposed project's or project variant's vehicle trips). With substantially less traffic generated under Alternative B, the traffic-related noise impact would be reduced and would be less than significant, as found for the proposed project and project variant (see Impact NO-4, pp. 4.D.62-4.D.64).

Land Use Compatibility

Like the proposed project or project variant, Alternative B would result in the introduction of new residential land uses along California Street. There would be fewer residential buildings along the perimeter of the site, and no new daycare use in the Walnut Building or retail uses at the ground floor of the Plaza B or Walnut buildings. The residential uses in Alternative B would be expected to have noise compatibility concerns with future noise levels similar to those identified for the proposed project or project variant, which were determined to be less-than-significant impacts (see Impact NO-5, pp. 4.D.64-4.D.67).

Cumulative Impacts

Construction-related noise and vibration impacts under Alternative B would be similar to those of the proposed project or project variant although of shorter duration. Construction-related cumulative noise and vibration impacts under Alternative B would be similar to those of the proposed project or project variant in combination with noise from construction of other nearby projects expected during the buildout period for the alternative, and also would be less than significant (see Impact C-NO-1, pp. 4.D.69-4.D.70). Under 2040 cumulative conditions with the proposed project or project variant, traffic noise increases of 2 dBA or less were identified, and the cumulative impact was determined to be less than significant (see Impact C-NO-2, pp. 4.D.71-4.D.72). Thus, any incremental increase in cumulative traffic noise levels along affected roadway segments of the local transportation network associated with cumulative growth plus the reduced land use program for Alternative B, which would generate less traffic than the proposed project or project variant, would also be less than significant.

AIR QUALITY

Under Alternative B, there would be less demolition, ground disturbance, and construction than under the proposed project or project variant. The majority of the project site would be undisturbed.

The expansion of the existing office use would be substantially offset by the large decrease in residential space on the project site compared to the proposed project and project variant. There would be no retail or daycare uses under Alternative B. Thus, Alternative B would be a reduction in the total gross square feet of floor area compared to the proposed project or project variant (approximately 39 and 44 percent less, respectively).

The emergency diesel generator and electrical substations in Basement Levels B1 and B2 of the existing parking garage would remain as well as the boilers, chillers and other equipment in the annex building. New emergency generators would not be sited at any other locations on the project site.

Construction

Construction would be completed in two years without any phasing. Thus, under Alternative B, unlike the proposed project or project variant, there would be no on-site sensitive receptors during construction. As described under Impact AQ-1, pp. 4.E.47-4.E.49, estimated construction-related emissions for criteria air pollutants for the proposed project or project variant would not exceed the applicable construction-related significance thresholds for reactive organic gases, nitrogen oxides, and particulate matter. Thus, under the more limited construction program of Alternative B, total construction-related criteria air pollutant emissions would be reduced in comparison to the proposed project or project variant.[14] Additionally, because Alternative B construction would not overlap with on-site operational activities, and because construction activities would be limited compared to the proposed project or project variant, the average daily construction emissions and annual emissions would not exceed BAAQMD thresholds and would be a less-than-significant impact, as with the proposed project or project variant.

Operations

As described under Impact AQ-2, pp. 4.E.49-4.E.52, estimated operational emissions for criteria air pollutants for the proposed project or project variant would not exceed the applicable significance thresholds for reactive organic gases, nitrogen oxides, and particulate matter. The reduced land use program under Alternative B would result in fewer area, stationary, and building energy sources of emissions, and consequently lower operational emissions compared to the proposed project or project variant. Alternative B would also generate lower mobile emissions from 3,410 to 3,417 fewer vehicle trips (an approximately 59 percent reduction) shown in Table 6.5, p. 6.43. As a result, the average daily criteria air pollutant emissions attributable to project operations under Alternative B would be reduced compared to the proposed project or project variant, and, like the proposed project or project variant, would result in a less-than-significant impact.

Toxic Air Contaminants

Similar to the proposed project or project variant, construction and operation of Alternative B would generate toxic air contaminants, including diesel particulate matter. Under Alternative B, a new (and larger) emergency diesel generator would not be needed to replace the existing one as under the proposed project or project variant, and emissions from the generator would be similar to existing conditions. As noted above, Alternative B would generate approximately 59 percent fewer vehicle trips per day than the proposed project or project variant. Thus, under the reduced construction and land use programs of Alternative B, less total construction and operational $PM_{2.5}$ and diesel particulate matter emissions would be generated than under the proposed project or project variant, and the maximum health risks for Alternative B would be similar to, or slightly

[14] This was determined by comparing the new gross square feet of construction for Alternative B and construction duration to a similar phase of construction for the proposed project (Phase 1); average daily emissions would be expected to be similar to that phase and would be lower than the maximum project construction emissions. This assumes construction emissions are directly proportional to new gross square footage.

less than, the maximum health risks from the proposed project or project variant.[15] With the occurrence of construction emissions in just two years for Alternative B (when exposure parameters for a child sensitive receptor are higher) the lower emissions from the reduced construction and land use programs would be offset somewhat such that the risk would trend closer to that for the proposed project or project variant, which was found to be less than significant. As with the proposed project or project variant, the addition of the health risks associated with Alternative B to the worst-case background scenario would also not exceed thresholds and would not result in the expansion of mapped Air Pollutant Exposure Zones. Therefore, as with the proposed project or project variant, project contributions under Alternative B, when added to background values, would not result in a significant health impact at the maximally exposed onsite and offsite sensitive receptors. As with the proposed project or project variant, annual average $PM_{2.5}$ contributions would be almost all from existing background levels, and excess cancer risk values would be well below thresholds (see Table 4.E.10, p. 4.E.58). Therefore, like the proposed project or project variant, TAC emissions would not result in off- or on-site sensitive receptor locations meeting the Air Pollutant Exposure Zone criteria for annual average $PM_{2.5}$ concentrations and excess cancer risk and would be less than significant.

Consistency with Clean Air Plan

As with the proposed project or project variant (see Impact AQ-4, pp. 4.E.60-4.E.65), Alternative B would support the primary goals of the *2017 Bay Area Clean Air Plan* and would include the plan's applicable transportation sector, building sector, energy sector, natural and working lands sector, waste sector, and water sector control measures. Under Alternative B, a transportation demand management program would be developed to promote the use of transit, walking, and bicycling as viable options to privately owned vehicles, pursuant to city ordinance. In addition, Mitigation Measure M-TR-4 would be implemented to improve local bus service. As with the proposed project or project variant, the inclusion of car-share parking, unbundled parking, and electric vehicle charging stations, as well as the measures in the transportation demand management program, would ensure consistency with applicable transportation control measures contained in the *2017 Bay Area Clean Air Plan*. Therefore, Alternative B would not conflict with, or obstruct implementation of the *2017 Bay Area Clean Air Plan*, and this impact, as with the proposed project or project variant, would be less than significant.

[15] This was determined by quantitatively comparing the exposure parameters for the decreased construction duration and the ratio of construction emissions assumed based on the new gross square footage. This also assumes a constant emission rate from construction. Because the construction activities would be located in a different location under this alternative, compared to the proposed project and project variant, and because there is no generator replacement, the location of the maximally exposed individual sensitive receptors would likely change.

Odors

Although there may be some potential for small-scale, localized odor issues around the construction site or the proposed site uses under Alternative B, e.g., from construction site activities or solid waste collection, substantial odor sources and consequent effects on sensitive receptors would be unlikely. Therefore, like the proposed project or project variant, Alternative B would not create objectionable odors that would affect a substantial number of people.

Cumulative Air Quality Impacts

As explained for the proposed project and project variant (see Impact C-AQ-1, p. 4.E.66), the contribution of a project's individual air pollutant emissions to regional air quality impacts is, by its nature, a cumulative effect. Thresholds for criteria air pollutants are based on levels that are not anticipated to contribute to an air quality violation. Therefore, if a project's emissions are below the project-level thresholds, the project would not be considered to result in a considerable contribution to cumulative regional air quality impacts. No significant cumulative air quality impact was identified for the proposed project or project variant. As discussed above, the air quality impacts of Alternative B would be less than under the proposed project or project variant and would not be significant. Therefore, Alternative B would not contribute considerably to a significant cumulative air quality impact.

Although there would be less construction and fewer operational emissions, including fewer vehicle trips, than the proposed project or project variant, Alternative B would result in a similar, or slightly reduced, health risk impact compared to that with the proposed project or project variant. Therefore, under Alternative B, in combination with existing background health risks and cumulative development, cumulative construction and operational related air quality impacts would be less than significant as with the proposed project or project variant, and mitigation would not be needed.

INITIAL STUDY TOPICS

Land Use and Planning

Alternative B would represent a more limited redevelopment of the existing 10.25-acre city block. Although it would not involve the construction of new mid-block walkways, and therefore would not integrate the site with the surrounding neighborhood as the proposed project or project variant would, site circulation in the vicinity of the project site would remain similar to existing conditions. For the same reasons as the proposed project and project variant, Alternative B would not present a new physical division of an existing community and would not conflict with land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect such that a substantial adverse physical change in the environment related to land use would result (see Topic E.1, Land Use and Planning, of the initial study, pp. 110-112). As such, Alternative B would have less-than-significant project-level impacts. No significant cumulative land use impact was identified for the proposed project or project variant in combination with other past, present and reasonably foreseeable cumulative land use changes in the project vicinity. As Alternative B would retain the existing office use with minor expansion and would result in less overall development on the project site than would the proposed project or project variant, the alternative also would not result in significant cumulative land use impacts.

Population and Housing

Under Alternative B, the residential population within the project site would be considerably reduced compared to the proposed project or project variant, but the existing office uses would be retained and expanded, and the office population would be greater than with the proposed project or project variant. However, the land use program would not be as diverse as the proposed project's or project variant's, i.e., limited residential, increased office use, and no retail or daycare uses and therefore fewer or no employees related to these uses.

Alternative B would introduce 377 residents to the site (884 fewer residents than the proposed project and 1,304 fewer residents than the project variant). It would increase the number of employees on site to 1,473 employees, compared to 395 with the proposed project and 206 with the project variant. This would represent an increase over the proposed project and project variant of approximately 1,078 employees and 1,267 employees, respectively.[16]

As with the proposed project and project variant, all employees are conservatively assumed to be new to the city. Thus, Alternative B would represent a larger percentage of the city's estimated employment growth between 2020 and 2040 than the proposed project and project variant (1.0 percent rather than 0.45 percent and 0.23 percent, respectively). The increase in office uses would not generate a substantial increase in employment over existing conditions. For the same reasons as the proposed project and project variant, employment growth associated with Alternative B would be negligible in the citywide context.

The increased demand for housing that would result from the increase in the employee population would be greater than that under the proposed project or project variant. Using the same methodology as for the proposed project and project variant, the new employees under Alternative B would generate a demand for approximately 1,116 new residential units (or approximately 870 to 960 more residential units than the proposed project and project variant, respectively). This would translate into a greater proportion of the city's estimated household growth between 2020 and 2040, although the proportion would remain low (approximately 1.6 percent versus 0.45 percent and 0.23 percent, respectively). Thus, for the same reasons as for

[16] Employee reductions for the other use categories not taken; thus, the net increase over the proposed project and project variant is conservative and impacts may be overstated.

the proposed project and project variant, employment growth associated with Alternative B and its resultant increase on the demand for housing would not be considered substantial in the context of total housing demand.

Like the proposed project or project variant, which would have less-than-significant population and housing impacts as described in Topic E.2, Population and Housing, of the initial study (pp. 112-120), this alternative would not induce substantial population growth, would not generate a substantial increase in employment-related housing demand, and would not displace any existing housing units or people. As such, Alternative B would have less-than-significant project-level impacts. No significant cumulative population and housing impacts were identified for the proposed project or project variant in combination with other past, present and reasonably foreseeable cumulative projects in the vicinity and at the citywide and regional levels. As Alternative B would retain the existing office use with minor expansion and would result in a decrease in the overall population (even with the increased daytime employment population) compared to the proposed project or project variant, Alternative B also would not result in significant population and housing impacts even with consideration to the continued and expanded office use in the existing building.

Cultural Resources (Archaeological Resources)

Compared with the proposed project and project variant, Alternative B would have less potential for impacts on archaeological resources (including human remains and tribal cultural resources) because it would have reduced grading and overall construction programs and consequently would disturb soils to a lesser degree. However, the nature of potential impacts related to archaeological resources, human remains, and tribal cultural resources would be substantially the same as those described for the proposed project and project variant because excavation would occur in areas with a high potential for encountering archaeological resources (see Topic E.3, Cultural Resources, pp. 125-135). Mitigation Measure M-CR-2a: Archaeological Testing, Monitoring, Data Recovery and Reporting, Mitigation Measure M-CR-2b: Interpretation, and Mitigation Measure M-CR-4: Tribal Cultural Resources Interpretive Program, identified for the proposed project and project variant, would be applicable to Alternative B and would reduce potential project-level impacts on archaeological resources to a less-than-significant level, and its contribution to the identified significant cumulative impact related to subsurface archaeological resources associated with the Laurel Hill Cemetery to less than considerable.

Greenhouse Gas Emissions

Alternative B would include approximately 39 percent less floor area than the proposed project (44 percent less than the project variant), the construction program and development footprint would be smaller than the proposed project or project variant, and the existing building would be retained. There would be a greater than 50 percent reduction in daily vehicle trips compared to the proposed project and project variant. Therefore, Alternative B would result in fewer construction and operation-related greenhouse gas emissions compared to the proposed project or project variant. Compliance with applicable regulations would ensure that Alternative B would be consistent with the City's GHG Reduction Strategy as well as regional and state plans and policies related to GHG emissions reduction efforts (see Topic E.7, Greenhouse Gas Emission, of the initial study, pp. 146-150). Thus, as with the proposed project and project variant, cumulative impacts related to GHG emissions would be less than significant.

Wind and Shadow

Under Alternative B, the Plaza B Building, at 60 feet, would be 15 feet taller than with the proposed project or project variant (45 feet), and the Walnut Building, at 60 feet, would be 7 feet shorter than the project variant and 15 feet taller than the proposed project. In addition, the Plaza B and Walnut buildings would be set back from the north property line and would have smaller footprints. The retained existing building at the center of the site would be approximately 25 feet shorter than under the proposed project or project variant (from 92 feet to 67 feet).

Wind

Under Alternative B, as with the proposed project or project variant, wind conditions along California Street would be altered; however, the change would be less pronounced under Alternative B because the Plaza A Building at the upwind north and west perimeters of the site would not be built and the height of the structures on the north side of California Street (ranging from 40 to 65 feet from the west to east) would be similar to the 60-foot-tall buildings proposed for the project site. Thus, the channelizing effects along California Street and the down-washing of the prevailing winds from the north and west would be somewhat reduced under Alternative B compared to the proposed project or project variant, and wind speeds along the adjacent sidewalks on California and Laurel streets (even with the increased heights of the two new buildings) would not exceed the wind hazard criterion. Wind conditions at other locations adjacent to the project site would be similar to existing conditions because new construction would be restricted to the north portion of the site. Therefore, for the same reasons as with the proposed project or project variant, project-level impacts under Alternative B, with less new development, also would be less than significant. Similarly, Alternative B would not combine with other cumulative projects in the vicinity to generate a significant cumulative impact related to wind.

Shadow

Under Alternative B, building heights would be lower than under the proposed project or project variant. Thus, due to distance and the presence of intervening structures, as with the proposed project or project variant, shadow under Alternative B would not reach the Laurel Hill Playground (west of the project site on Collins Street, approximately 385 feet west of the intersection of Euclid Avenue and Laurel Street) or the Presidio Heights Playground (between Walnut and Laurel streets on Clay Street, approximately 530 feet north of the project site). Under Alternative B, shadow cast on public sidewalks would not be as extensive because fewer buildings would be constructed along the perimeter of the site. Therefore, for similar reasons as with the proposed project or project variant, project-level shadow impacts under Alternative B, with less new development, would also be less than significant. Similarly, Alternative B would not combine with other cumulative projects in the vicinity to generate a significant cumulative impact related to shadow.

Recreation

Alternative B would have a smaller development footprint and would retain more of the existing on-site open space than the proposed project or project variant. The residential population on the project site would be considerably reduced due to the reduction in number of residential units under this alternative. Alternative B would introduce 377 new residents to the site, a reduction of 884 residents and 1,304 residents from the proposed project and project variant, respectively. Similar to the proposed project and project variant, Alternative B would develop common and private open space to accommodate new residential uses. The existing office uses would be retained and the employee population would be 1,078 to 1,276 persons greater than that of the proposed project or project variant. The increase in office space would generate approximately 273 more employees than currently work at the site; this is not a substantial increase in the daytime worker population. This increase in the daytime worker population would not substantially increase or accelerate the physical deterioration of existing parks and recreation facilities because workers would not be expected to frequent nearby recreation facilities.

Like the proposed project and project variant, which would have less-than-significant recreation impacts as described in Topic E.9, Recreation, of the initial study (pp. 163-70), this alternative, with less new development, would not increase the use of recreational facilities such that physical deterioration of the facilities would be accelerated, would not require construction of new or expanded recreational facilities, and would not physically degrade existing recreational resources. As such, Alternative B would have less-than-significant project-level impacts. No significant cumulative recreation impacts were identified for the proposed project or project variant in combination with other past, present and reasonably foreseeable population and employment increases in the project vicinity and at the citywide level. As Alternative B would retain the existing office use with minor expansion and would result in a decrease in the overall population compared to the proposed project or project variant (even with the increased daytime employment population), Alternative B also would not increase impacts to such a degree as to result in a cumulative impact on recreational resources.

Utilities and Service Systems

Similar to the proposed project and project variant, development under Alternative B would trigger the requirements of the City's Stormwater Management Requirements and Design Guidelines, and stormwater flows to the combined sewer system would be reduced by 25 percent. Alternative B would have 884 fewer residents than the proposed project and 1,304 fewer residents than the project variant. The employee population would increase over that under the proposed project or project variant with the retention and expansion of the office use (approximately 1,078 to 1,276 more on-site employees than under the proposed project or project variant). The employee population increase over existing conditions would not be substantial (approximately 273 employees). Water and wastewater demands under Alternative B would be less than that evaluated under the proposed project or project variant. Thus, water supply demand and demands on the wastewater system under Alternative B would be less than that for the proposed project or project variant. Because the wastewater flows under Alternative B would be less than under the proposed project or project variant, they would remain within the capacity of the Southeast Water Pollution Control Plant.

Like the proposed project and project variant, which would have less-than-significant impacts on utilities and service systems (see Topic E.10, Utilities and Service Systems, of the initial study, pp. 173-188), Alternative B would not exceed applicable wastewater treatment requirements; would not require construction or expansion of water, wastewater, or stormwater facilities; would not require new or expanded water supply resources or entitlements; would not result in a determination that that project has inadequate wastewater treatment capacity; would be served by a landfill with sufficient capacity; and would comply with federal, state and local statutes and regulations related to solid waste. As such, Alternative B would have less-than-significant project-level impacts. No significant cumulative impacts related to utilities and service systems were identified for the proposed project or project variant in combination with population and employment increases from cumulative projects in the vicinity and at the citywide and regional levels. Alternative B would retain the existing office use with minor expansion and residential population growth would be reduced relative to the proposed project and project variant; therefore, Alternative B would not result in utilities and service systems impacts even with the incremental contribution from the employment increase.

Public Services

The increase of approximately 650 residents and employees with Alternative B would be substantially less than the total number of residents and employees under the proposed project and project variant. Like the proposed project and project variant, which would have less-than-significant public services impacts (see Topic E.11, Public Services, of the initial study, pp. 189-197 and supplemented in Section 4.F), this alternative would not result in adverse physical impacts associated with any need for expanded public services or for facilities to provide such services. Alternative B also would not increase demand for public services in combination with other past, present and reasonably foreseeable development to such a degree as to result in a cumulative impact on public services.

Biological Resources

Compared with the proposed project and project variant, Alternative B would reduce impacts on biological resources because it would result in less ground disturbance, remove fewer trees and vegetation, and have a reduced overall construction program. Although demolition, excavation, and site preparation activities would be more limited than with the proposed project or project variant, potential impacts on biological resources would be substantially similar in character to those analyzed for the proposed project and project variant (see Topic E.12, Biological Resources, of the initial study, pp. 197-204).

The sky bridge would not be constructed, and the vertical addition to the retained office building would be shorter under this alternative; however, exterior alterations would include window replacement. These modifications would be potential obstacles for resident or migratory birds. Similar to the proposed project and project variant, the application of bird-safe glazing treatments (as outlined in Planning Code Section 139) would be included for all building feature-related hazards to ensure bird safety. Unlike the proposed project or project variant, the glazing treatments would also need to be historically appropriate).

Like the proposed project and project variant, Alternative B, although proposing less development, would still require nesting bird mitigation as described in the initial study on pp. 200-201. With mitigation, the alternative would not cause a significant impact on biological resources. Alternative B also would not combine with other past, present and reasonably foreseeable cumulative projects to create a significant cumulative impact on biological resources.

Geology and Soils

Alternative B would involve less excavation and soil disturbance and would have a smaller development footprint compared to the proposed project and project variant. Similar to the proposed project and project variant, Alternative B would require mitigation in the event of inadvertent discovery of paleontological resources (see Mitigation Measure M-GE-5: Inadvertent Discovery of Paleontological Resources, in Topic E.13, Geology and Soils, of the initial study, pp. 214-215). With implementation of this measure, any impact would be less than significant.

Similar to the proposed project and project variant, new development under Alternative B would be required to comply with building code requirements to reduce seismic hazards, as discussed in the initial study (pp. 208-210). Alterations and additions to the existing building would require compliance with the requirements of the San Francisco and/or Historical Building codes, following a seismic analysis. Because the extent of soil disturbance would be less than that with the proposed project or project variant, the potential for soil erosion, change in site topography, and creation of unstable slopes would be less than with the proposed project or project variant, and project-level impacts under Alternative B would remain less than significant.

As with the proposed project and project variant, Alternative B would not combine with other past, present and reasonably foreseeable cumulative changes in the project vicinity, resulting in a significant cumulative impact related to geology and soils. Thus, cumulative geology and soils impacts under this alternative, with less development and site disturbance, would also be expected to be less than significant.

Hydrology and Water Quality

The proposed project and project variant would have less-than-significant impacts related to hydrology and water quality. Alternative B would involve less ground disturbance and therefore would have fewer construction-related hydrology and water quality concerns compared to the proposed project or project variant. Similar to the proposed project and project variant, under Alternative B erosion and sediment control and stormwater pollution prevention plans would be required.

The wastewater demands under Alternative B would be less than those under the proposed project or project variant because of the reduced land use program. Similar to the proposed project and project variant, development under this alternative would trigger the applicability of the Stormwater Management Requirements and Design Guidelines, which require up to a 25 percent reduction in stormwater flows. Similar to the proposed project and project variant, this alternative would not require the construction of new or expanded off-site wastewater and stormwater infrastructure, other than to provide new connections to existing infrastructure.

Because the Alternative B development footprint would be smaller than that for the proposed project or project variant, there would be fewer changes to the existing site compared to the proposed project and project variant. Therefore, Alternative B would have reduced impacts related to impervious surfaces and stormwater flows, water quality, groundwater dewatering, alteration of drainage patterns, and groundwater depletion and interference with groundwater recharge than those described for the proposed project or project variant, and the impacts would continue to be less than significant. As with the proposed project and project variant, Alternative B would have no impacts associated with placing housing or structures within a 100-year flood hazard area, or exposing people or structures to significant risk of loss, injury, or death involving flooding or inundation by seiche, tsunami or mudflow.

Like the proposed project and project variant, Alternative B would have less-than-significant project-level impacts related to hydrology and water quality (see Topic E.14, Hydrology and Water Quality, of the initial study, pp. 216-227). No significant cumulative hydrology and water quality impact was identified for the proposed project or project variant, in combination with other past, present and reasonably foreseeable cumulative changes in the project vicinity and at the citywide and regional levels. Thus, cumulative hydrology and water quality impacts under Alternative B, with less development and site disturbance and in combination with other past, present and reasonably foreseeable cumulative projects, would also be expected to be a less-than-significant cumulative impact.

Hazards and Hazardous Materials

Under Alternative B, the demolition, excavation, and construction program and development footprint would be smaller than the proposed project and project variant. Alternative B would have approximately 39 percent less floor area than the proposed project and 44 percent less than the project variant, but similar land uses to the proposed project (residential and office). The existing annex building and office building would be retained, with demolition limited to interior renovations.

As with the proposed project or project variant, Alternative B would involve the removal of hazardous building materials and soils; however, the volume of demolished building materials and excavated soils that would be classified as hazardous would be substantially reduced due to the more limited excavation and building demolition program. In particular, Alternative B, with a smaller footprint for the California Street Garage and no Plaza A Building, would not disturb one of the main areas where contaminated soils have been identified, the existing annex building. Excavation would also occur in areas where bedrock containing serpentinite (i.e., naturally occurring asbestos) may be encountered, as with the proposed project or project variant. The overall excavation program would be reduced under Alternative B so the potential to encounter naturally occurring asbestos would also decrease. Therefore, compared to the proposed project or project variant, Alternative B would have reduced impacts related to the handling, transport, and disposal of hazardous materials during construction; reduced impacts related to the potential to encounter hazardous materials in the soil and groundwater during construction; and reduced impacts related to accidental releases of hazardous emissions within a quarter mile of a school. Nonetheless, Alternative B would be subject to the same regulatory requirements associated with the routine handling, transport, and disposal of hazardous materials, and the project sponsor would be required to create and implement a site mitigation plan, construction dust control plan, and asbestos dust control plan. Current UCSF laboratory uses would be removed in accordance with UC requirements and California Department of Public Health regulations for the closure and transport of hazardous materials associated with the laboratory use. For these reasons, as with the proposed project or project variant, hazardous materials impacts would be less than significant.

Under Alternative B common hazardous materials would likely be used during operation and, like the proposed project or project variant, routine use would result in less-than-significant impacts. Access to the site perimeter and into the site would be similar to existing conditions. Therefore, like the proposed project or project variant, Alternative B would not interfere with an adopted emergency response plan or emergency evacuation plan and the impact would be less than significant.

Like the proposed project and project variant, Alternative B would also have less-than-significant impacts related to hazards and hazardous materials impacts (see Topic E.15, Hazards and Hazardous Materials, of the initial study, pp. 227-240, supplemented in Section 4.F). No significant cumulative hazards and hazardous materials impact was identified for the proposed project or project variant, in combination with other past, present and reasonably foreseeable cumulative changes in the project vicinity. Thus, cumulative hazards and hazardous materials impacts under Alternative B, with less development and site disturbance and in combination with other past, present and reasonably foreseeable cumulative projects, would also be expected to be a less-than-significant cumulative impact.

Mineral and Energy Resources

There are no known mineral resources within the project site. Similar to the proposed project and project variant, Alternative B would have no impact on a mineral resource. The potential energy resources impacts related to the construction and operation of Alternative B would be less than those of the proposed project or project variant because there would be fewer buildings constructed and occupied. Alternative B would not involve large amounts of fuel, water, or energy use or use them in a wasteful manner, and impacts would be less than significant, as with the proposed project or project variant (see Topic E.16, Mineral and Energy Resources, of the initial study, pp. 242-245). As such, Alternative B, with less development and site disturbance, would not have any significant project-level impacts, and, like the proposed project and project variant, would not combine with other past, present and reasonably foreseeable cumulative changes in the project vicinity to generate a significant cumulative impact related to mineral and energy resources.

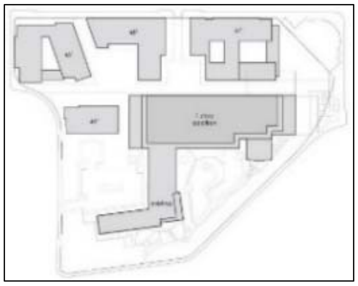
Agricultural and Forest Resources

As with the proposed project and project variant, Alternative B would not convert farmland, conflict with agricultural or forest land zoning or a Williamson Act contract, nor result in a loss or conversion of forest land or farm land. Therefore, as with the proposed project and project variant, there would be no impacts related to agricultural and forest resources under Alternative B.

CONCLUSION

By retaining most of the character-defining features of the historical resource at 3333 California Street, and rehabilitating in accordance to the Secretary's Standards, Alternative B, unlike the proposed project or project variant, would result in a less-than-significant impact on historic architectural resources. Alternative B would have less-than-significant vibration impacts on the SF Fire Credit Union building during construction based on the greater distance between construction equipment and that building, unlike the proposed project or project variant, which would be required to implement a mitigation measure to reduce the impact to a less-than-significant level. Under Alternative B, the VMT impact would be less than significant because there would be no parking allocated for retail uses (no retail would be developed), and the amount of parking allocated to the other non-residential use (office) would be equal to the neighborhood parking rate. Thus mitigation to reduce the retail parking supply would not be needed under Alternative B, as would be required under the proposed project and project variant (parking allocated for retail uses) to reduce the impact to a less-than-significant level. Like the proposed project or project variant, Alternative B would generate significant and unavoidable impacts related to transportation and circulation (transit capacity) and construction noise, although these impacts would be reduced somewhat due to the scaled down construction and land use programs. With regard to operational noise (stationary sources), impacts would be less than significant with mitigation, the same as under the proposed project or project variant. As with the proposed project or project variant, air quality impacts under Alternative B would be less than significant. Under Alternative B, no other significant impacts beyond those identified in the initial study for the proposed project or project variant, e.g., archaeological resources (including human remains and tribal cultural resources), biological resources, and paleontological resources would occur. As with the proposed project or project variant, the same mitigation measures identified in the initial study would be applicable to this alternative and impacts would be reduced to less-than-significant levels.

D. ALTERNATIVE C: FULL PRESERVATION - RESIDENTIAL ALTERNATIVE

Overview: 	Existing office building mostly retained and adapted for residential use. One-level vertical addition constructed on roof. Annex building demolished. Parking garage under existing office building partly retained. New construction limited to northern and western portions of the site adjacent to California Street and Laurel Street/Mayfair Drive. Plaza A, Plaza B, Walnut, and Mayfair buildings, the Mayfair Walk, and the California Street and Mayfair garages developed. Uses: Residential, retail, parking, and daycare; no office.
Character-Defining Features Retained:	Character-defining features of the existing building mostly retained. Site and landscape features contributing to corporate campus setting mostly retained. Most prominent views of project site retained with minimal change.
General Comparison to Proposed Project and Variant:	• Reduced construction program and slightly reduced land use program. • Retains more of existing building. • Nine fewer buildings constructed. • Less parking provided. • Due to fewer residential units and less retail space and no office, could address magnitude or severity of other significant impacts of proposed project or project variant.

LAND USE PROGRAM

Alternative C would have a total of 1,141,734 gross square feet of new and rehabilitated space, as follows:

- 705,179 gross square feet of residential floor area (534 residential units)
- 44,306 gross square feet of ground-floor retail space
- 377,599 gross square feet of parking
- 14,650 gross square feet of daycare center space

Up to 746 vehicle parking spaces, including 8 car-share spaces and 60 commercial parking spaces, would be provided in the California Street and Mayfair garages, the retained parking garage under the existing office building, and the retained surface parking lot south of the proposed Mayfair Building. (See Table 6.1, pp. 6.13-6.15.)

The development program would be reduced by approximately 17 percent compared to the proposed project and 23 percent compared to the project variant.

OVERVIEW

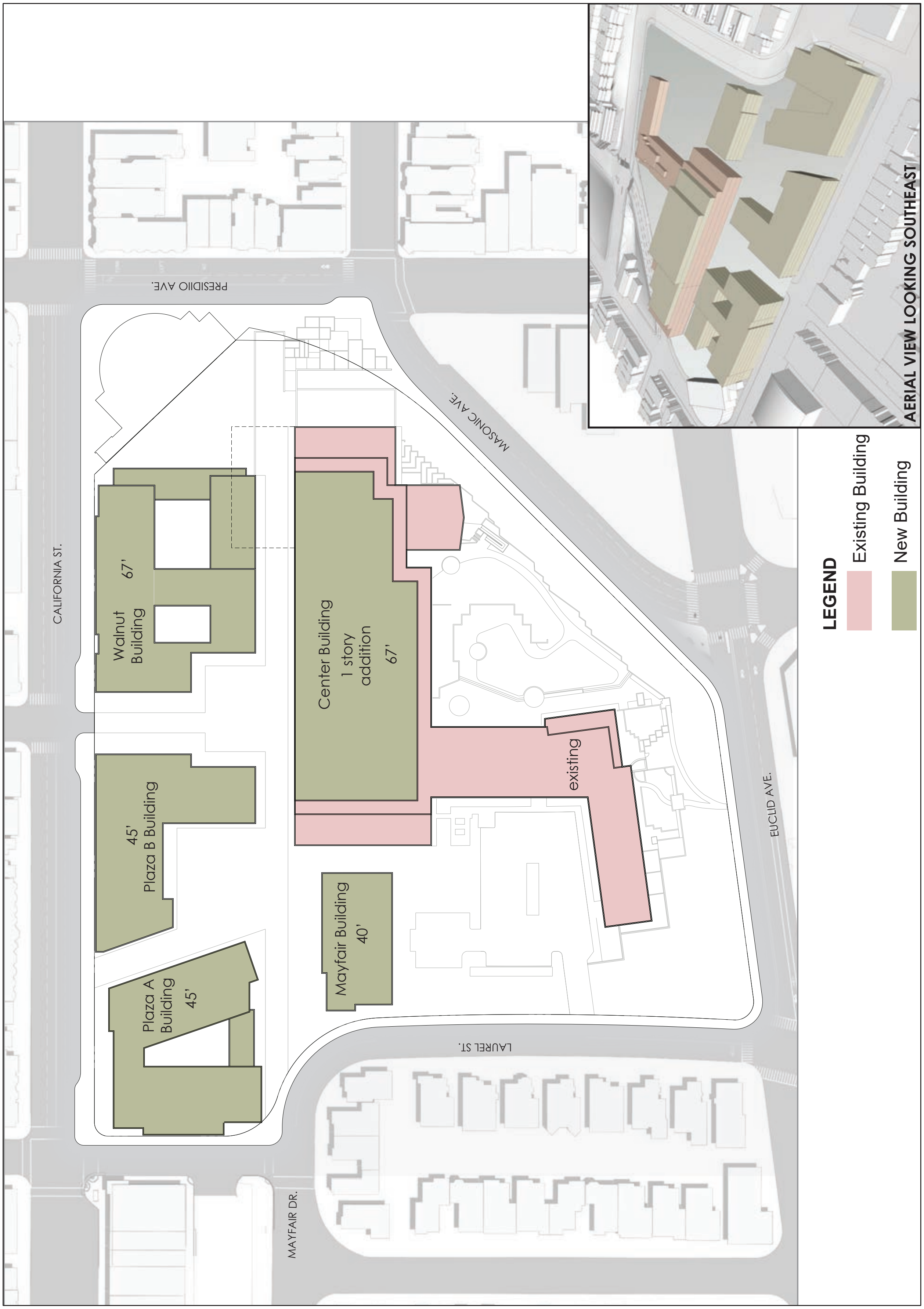
Under Alternative C, the existing office building would be mostly retained and converted to residential use. A one-level vertical addition would be constructed to add more space for the residential use. Elements of the office building that would not be retained are the north-facing entry, the northerly extension of the east wing, and the exposed concrete piers over the garage. A portion of the building's parking garage would be retained; however, the circular garage ramp structures would be demolished.

As shown on Figure 6.5: Alternative C: Full Preservation – Residential Alternative Site Plan, new construction would be restricted to the northern and western portions of the site adjacent to California Street and Laurel Street/Mayfair Drive. As under the project variant, three new mixed-use multi-family residential buildings with ground-floor retail (the Plaza A, Plaza B, and Walnut buildings), one new multi-family residential building (the Mayfair Building), and two garages (the California Street and Mayfair garages) would be constructed. The annex building, perimeter brick wall, and surface parking lots on the northern portion of the site would be demolished to make way for the new construction. On the western portion of the site along Laurel Street and south of Mayfair Drive, the concrete pergola, terraced formal landscaping, and surface parking would be mostly retained, and development would not be as extensive as it would under the proposed project or project variant because the Laurel Duplexes would not be constructed. Existing conditions on the southern and eastern portions of the project site would be maintained.

The view through the project site to the existing building from Laurel Street (looking west) would be altered with development of the Mayfair Building. The most prominent views of the project site, from the east on Pine Street (looking west) and from the south on Masonic Avenue (looking north), would be retained with minimal change.

REUSE OF EXISTING BUILDING

The footprint of the office building would be altered slightly from that under existing conditions and Alternative B. Unlike the proposed project and project variant, building demolition would be limited to the north-facing entry, the northerly extension of the east wing, and the exposed concrete piers over the garage along with the circular garage ramp structures. Similar to the proposed project or project variant, Alternative C would adaptively reuse the existing office building for residential use and would replace the glass curtain window wall system. Under Alternative C the new window wall system would be designed to be compatible with the character of the historic resource. Unlike the proposed project or project variant, the existing building would be retained as one building instead of being divided into two, and only one floor



Source: Laurel Heights Partners, LLC (2018)

3333 CALIFORNIA STREET MIXED-USE PROJECT

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FIGURE 6.5: ALTERNATIVE C: FULL PRESERVATION - RESIDENTIAL ALTERNATIVE SITE PLAN

of residential use would be added, instead of two to three floors. The existing office building's auditorium space would be retained as an amenity for future residents.

As with the proposed project and project variant, the existing building's 13-foot-tall mechanical equipment room would be relocated/removed to accommodate the vertical addition. The vertical addition would increase the height of the existing building from 55 feet 6 inches to 66 feet 8 inches. Its design and setbacks would be similar to those described for Alternative B (p. 6.31). With the addition of one floor to the existing building, there would be a total 369,818 gross square feet of residential space for 190 residential units in the building.

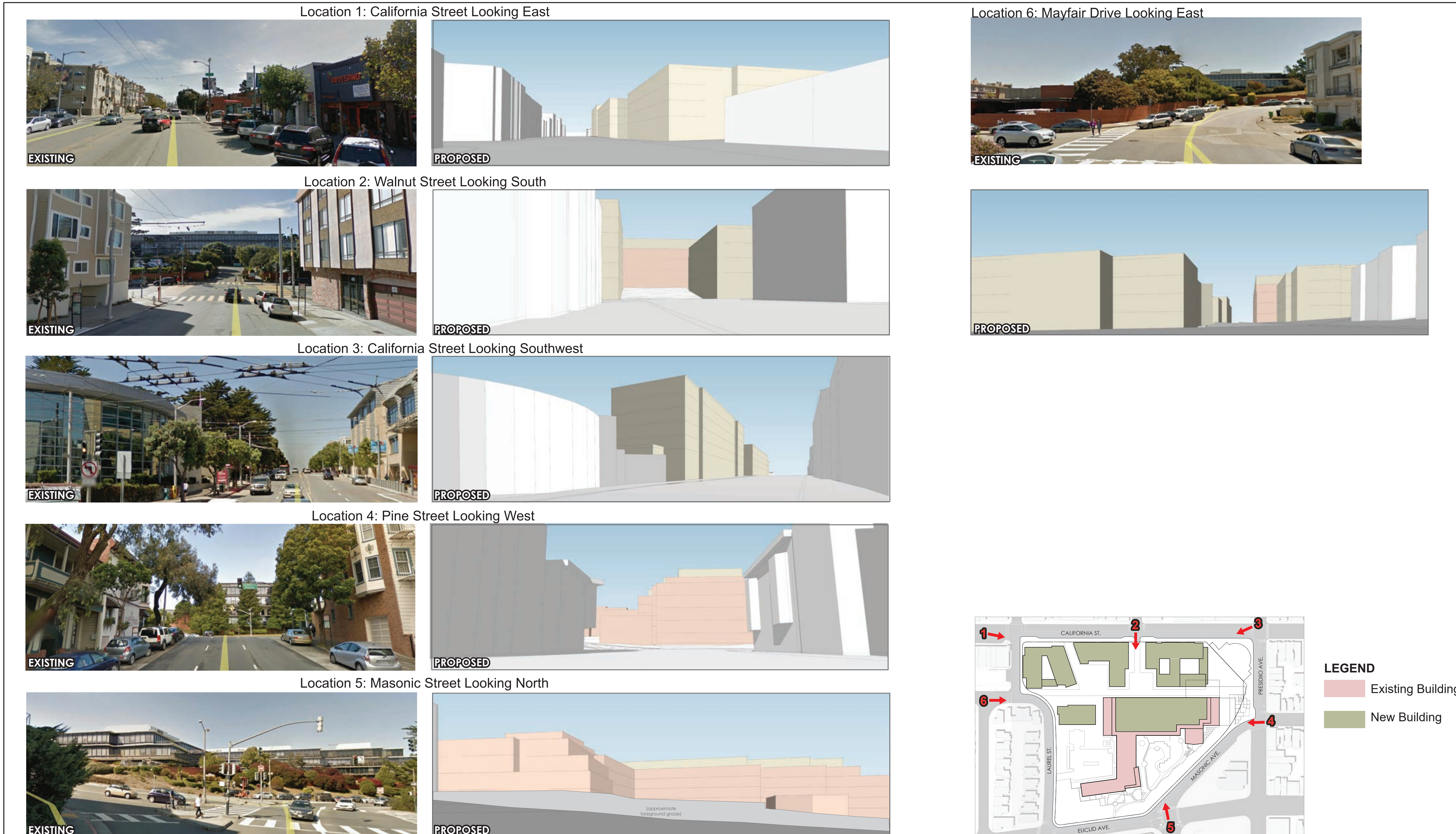
NEW CONSTRUCTION

The land use program, footprints, and heights for the Plaza A, Plaza B, Walnut, and Mayfair buildings would be the same as under the project variant. (See Chapter 2, Project Description, Figures 2.3 and 2.32, pp. 2.5 and 2.102, respectively, and Figure 6.5. See Figure 6.6: Alternative C: Full Preservation – Residential Alternative Building Massing, p. 6.69, for proposed building massing on the project site from different locations around the site.) Under Alternative C, similar to the project variant, development of the four new buildings along California and Laurel streets would total 335,361 gross square feet of residential use with 344 residential units, 14,650 gross square feet of daycare use, and 44,306 gross square feet of retail use. The Plaza A and Plaza B buildings would be 45 feet tall, with ground floor retail. The Walnut Building would be 67 feet tall and would include ground floor retail and daycare space. The Mayfair Building would be a four-story residential building with a proposed height of 40 feet. Overall, under Alternative C, there would be 119,512 fewer gross square feet of residential use than under the proposed project and 273,432 fewer gross square feet than under the project variant. (See Table 6.1, pp. 6.13-6.15.)

SITE ACCESS AND PARKING

PARKING AND CIRCULATION

Alternative C would provide two new below-grade parking garages (the California Street and Mayfair garages, one fewer than the proposed project and project variant); and partly retain the parking garage under the existing office building. The parking program would replace and expand the existing 543 surface and subsurface parking spaces on the project site. Unlike the proposed project or project variant, 80 of the 331 surface parking spaces on the project site would be retained. Overall, there would be a total of 746 off-street parking spaces under Alternative C: 534 spaces for residential uses, 115 spaces for retail uses, 29 spaces for the daycare use, 60 commercial parking spaces, and 8 car-share spaces. Thus, Alternative C would provide



Source: Laurel Heights Partners, LLC (2018)

3333 CALIFORNIA STREET MIXED USE PROJECT

FIGURE 6.6: ALTERNATIVE C: FULL PRESERVATION - RESIDENTIAL ALTERNATIVE BUILDING MASSING

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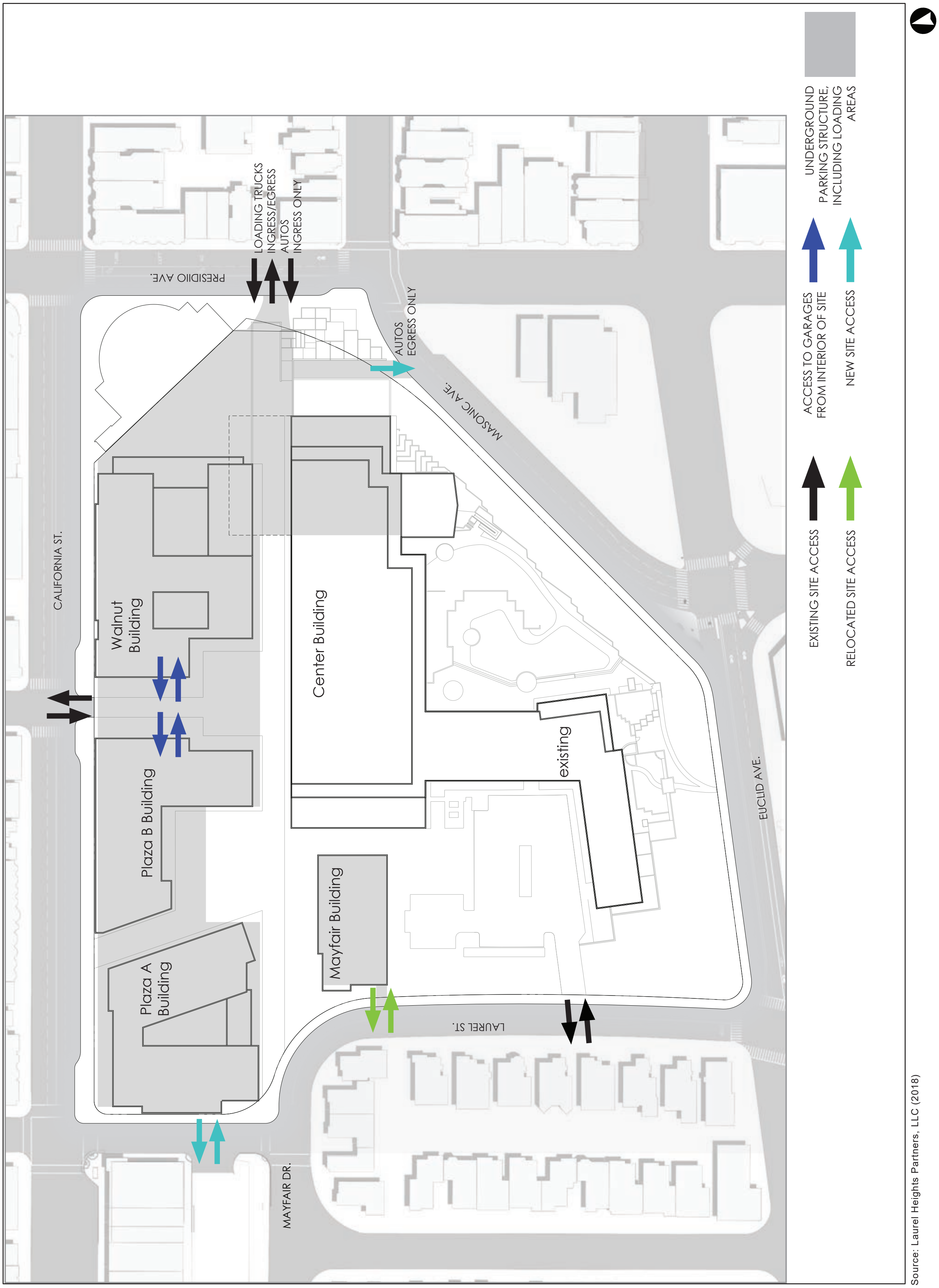
203 more off-street parking spaces than there are currently, 149 fewer spaces than the proposed project and 225 fewer spaces than the project variant. Except for the 30 off-street residential parking spaces for the Mayfair Building (as with the proposed project and project variant) and the 80 off-street residential parking spaces on the retained surface lot near Laurel Street south of the Mayfair Building, all other off-street parking associated with the residential use (424 spaces) would be in the California Street Garage and the retained parking levels under the adaptively reused residential building. All off-street parking associated with retail and daycare uses, the 60 commercial parking spaces, and the 8 car-share spaces would be located in the California Street Garage.

Unlike the proposed project or project variant, only one of the two new curb cuts on Masonic Avenue would be constructed; only one of the seven new curb cuts on Laurel Street south of Mayfair Drive would be constructed; and the existing curb cut on Laurel Street south of Mayfair Drive would be retained as the entry/exit driveway to the 80 onsite surface parking spaces. In all other respects the circulation changes under Alternative C would be similar to those for the proposed project or project variant, e.g., the existing 28-foot-wide curb cut at the California Street entrance would be reduced to 22 feet with the development of curb bulb-outs at the extension of Walnut Street into the project site and a new 18-foot-wide curb cut would be introduced at Laurel Street just south of California Street. Vehicles would enter and exit the California Street and Mayfair garages and the retained parking garage from the following access points (see Figure 6.7: Alternative C: Full Preservation – Residential Alternative Site Access for site and garage access points and the footprint of the retained and proposed parking garages):

- An entry/exit driveway for the California Street Garage off each side of the Walnut Street extension into the project site.
- A shared driveway off Presidio Avenue. The driveway would have one entry/exit to the off-street freight loading dock in the California Street Garage. Another separate entry (ingress only) would lead to the daycare, retail, car-share, and commercial parking spaces on Basement Levels B3 and B2 of the California Street Garage and to the residential parking in Basement Level B3 of the retained parking garage under the adaptively reused building.
- An exit-only driveway onto Masonic Avenue near the intersection with Pine Street for the California Street Garage and the retained parking garage under the adaptively reused building (residential, retail, commercial, daycare, and car-share parking spaces).
- An entry/exit driveway onto Laurel Street south of the Mayfair Building for the retained surface parking spaces (residential parking).
- An entry/exit driveway onto Laurel Street south of Mayfair Drive for the Mayfair Garage.
- A right-turn in entry/right-turn out exit driveway onto Laurel Street between California Street and Mayfair Drive for the California Street Garage (residential only).



Source: Laurel Heights Partners, LLC (2018)

3333 CALIFORNIA STREET MIXED-USE PROJECT

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FIGURE 6.7: ALTERNATIVE C: FULL PRESERVATION - RESIDENTIAL ALTERNATIVE SITE ACCESS

Overall, there would be a net reduction of 16 on-street parking spaces under Alternative C, 20 fewer than under the proposed project or project variant, because there would be fewer curb cuts introduced and fewer spaces would be converted to passenger loading spaces.

As with the proposed project or project variant, under Alternative C emergency vehicles would continue to have access to the perimeter of the project site. They would access the center of the site via the Walnut Street extension and the west end of Mayfair Walk.

PEDESTRIAN CIRCULATION

Unlike the proposed project or project variant, the project site would not be fully integrated with the existing street grid. Under Alternative C, the east-west Mayfair Walk would be constructed, but the north-south Walnut Walk would not. However, as with the proposed project or project variant, the extension of Walnut Street into the project site would be developed, would terminate at a roundabout, and would provide another point of access for pedestrians. Under Alternative C pedestrians would be able to walk onto the project site from California and Walnut streets, Mayfair Drive; and Presidio Avenue, Masonic Avenue, and Pine Street; however, pedestrians would not be able to travel through the site to, or access the site from, Masonic and Euclid avenues. As with the proposed project or project variant, Mayfair Walk would start at Mayfair Drive and Laurel Street and terminate near Presidio Avenue; and the eastern terminus would include the Presidio Overlook and steps to access Presidio Avenue, Masonic Avenue, or Pine Street. A pedestrian walkway between the Plaza A and Plaza B buildings (Cypress Stairs) would provide access to the site from the California Street sidewalk. Access to the green lawn at the corner of Laurel Street and Euclid Avenue would remain as under existing conditions; however, unlike the proposed project or project variant, under Alternative C no improvements would be introduced at this location.

FREIGHT AND PASSENGER LOADING PROGRAM

As with the proposed project or project variant, commercial freight loading activities would occur at the off-street freight loading area in the California Street Garage accessed from Presidio Avenue, and would serve all future retail tenants via service corridors, elevators, and internal stairs. The garage would have three freight loading spaces (not six as with the proposed project or project variant).

<u>On-Street Loading</u>: As with the proposed project and project variant, the project sponsor would request from the SFMTA the conversion of five on-street parking spaces on the south side of California Street near Laurel Street to create one 100-foot-long commercial loading zone. Unlike the proposed project or project variant, the project sponsor would not seek the conversion of seven on-street parking spaces into two separate 60-foot-long passenger loading zones on Masonic and Euclid avenues; however, the project sponsor would continue to seek the conversion

of three on-street parking spaces on Laurel Street near Mayfair Drive into a 60-foot-long passenger loading zone. Thus, under Alternative C, eight on-street spaces would be converted to freight or passenger loading zones instead of 15 under the proposed project or project variant.

In addition, as with the proposed project or project variant, passenger loading would also occur at the proposed roundabout at the terminus of the Walnut Street extension into the project site, and daycare center pick-up/drop-off activities would occur at Basement Level B3 of the California Street Garage at a location adjacent to the elevator lobby for the daycare center space.

Residential Move-In and Move-Out Loading Activities: As with the proposed project or project variant, residential move-in and move-out loading activities would occur in the off-street freight loading area in the California Street Garage, from existing on-street parking spaces along California or Laurel streets (with a special time-limited permit from the SFMTA), and additionally from the 80-space surface parking lot on the west portion of the site near Laurel Street that would be retained.

Trash/Waste Pick-up: As with the proposed project or project variant, under Alternative C solid waste would be collected at the off-street refuse staging area adjacent to the off-street freight loading dock in the California Street Garage and compacted for offsite transport. Solid waste from the off-street loading dock in the California Street Garage as well as from the Mayfair Building (placed at the Laurel Street curb) would be picked up by Recology on a regularly scheduled service program. Unlike the proposed project or project variant, a second off-street loading dock would not be needed.

STREETSCAPE CHANGES

Under Alternative C, as with the proposed project or project variant, the streetscape changes at the Masonic Avenue/Presidio Avenue/Pine Street intersection would be implemented and integrated with the Pine Street Steps and Plaza. See Chapter 2, Project Description, Figure 2.28a: Existing Streetscape and Proposed Streetscape Changes - Presidio Avenue, p. 2.81, for an illustration of the proposed change at the Masonic Avenue/Presidio Avenue/Pine Street intersection. As with the proposed project or project variant, a corner bulb-out would be constructed at the northeast corner of Laurel Street/Mayfair Drive at the three-way intersection along with an eastside crosswalk crossing Mayfair Drive. As with the proposed project or project variant, Alternative C would include sidewalk widening along the perimeter sidewalks and corner bulb-outs at the southeast and southwest corners of California and Walnut streets (see Table 6.1, pp. 6.13-6.15). Alternative C would not include streetscape changes at the intersection of Masonic and Euclid avenues, elimination of the westbound slip lane at that intersection, or a corner bulb-out at the northeast corner of the Laurel Street/Euclid Avenue intersection. Site development under Alternative C would comply with the Urban Forestry Ordinance similar to the proposed project or project variant; and the removal of significant trees would require application and approval of a permit from public works.

CONSTRUCTION

Alternative C would be constructed in approximately 5.5 years and two phases. Construction activities included in the phases are listed below; and as with the construction program for the proposed project and project variant the phases could be developed in a different order.

- First phase: Demolition of the circular garage ramp structures and the northerly extension of the east wing of the existing office building and alterations to the existing office building.
- Second phase: Demolition of the existing annex building and the surface parking lots on the north and west portions of the site, excavation and site preparation for construction of the California Street buildings and the Mayfair Building and associated garages.

As with the proposed project or project variant excavation under Alternative C would extend to a depth of approximately 40 feet below ground surface and would encounter bedrock (including naturally occurring asbestos). Site disturbance would occur in an area of known soil and groundwater contaminants from historic uses. Thus, site redevelopment would be conducted pursuant to a required site mitigation plan.

ABILITY TO MEET PROJECT OBJECTIVES

Alternative C would meet most of the basic project objectives, although in most cases to a lesser degree than would the proposed project or project variant. Alternative C would redevelop a large underutilized commercial site to a lesser degree than the proposed project or project variant, but with a similar mix of uses, improving and encouraging walkability and convenience (Objectives 1 and 2). This alternative would increase the City’s housing supply (Objective 3) with 534 residential units, but to a lesser extent than the proposed project or project variant, with 24 fewer units than the proposed project and 210 fewer units than the project variant. Alternative C would open and connect the site to the surrounding community by extending the neighborhood urban pattern and surrounding street grid into the site through a series of pedestrian pathways and open spaces, but to a lesser degree, as only Mayfair Walk, and not Walnut Walk, would be developed to extend through the entire site (Objective 4). Alternative C would provide a similar level of active ground floor retail uses, but fewer activated neighborhood-friendly spaces along the adjacent streets, and therefore would achieve Objective 5 to a lesser degree than the proposed project or project variant. Alternative C would provide a high quality and varied architectural and landscape design, utilizing the site's topography and other unique characteristics (Objective 6). Alternative C would construct some open spaces such as the plazas and Mayfair Walk that would be usable to project residents and surrounding community members, but not as many as the proposed project or project variant, and would therefore achieve Objective 7 to a lesser degree than the proposed project or project variant. Alternative C would partially meet Objective 8 by providing code-required open space; however, open space would not be as varied or designed to maximize pedestrian accessibility. Alternative C would include sufficient off-street parking to meet the project's needs (Objective 9), and it would retain and integrate the existing office building into the development (Objective 10).

IMPACTS OF ALTERNATIVE C: FULL PRESERVATION – RESIDENTIAL ALTERNATIVE

CULTURAL RESOURCES (HISTORIC ARCHITECTURAL RESOURCES)

Approach

The historic preservation approach for Alternative C focused on the adaptive reuse of the existing building for residential use and retaining the majority of the character-defining features of the building, site, and landscape that contribute to the Midcentury Modern-designed corporate campus property. (See summary below for the disposition of the character-defining features under Alternative C, and Figure 6.5 and Figure 6.6, pp. 6.67 and 6.69). As discussed below, under Alternative C the existing building, site, and landscape would be retained; however, fewer site and landscape features (including non-historic features) would be retained than under Alternative B. However, views of the most prominent character defining features of the property, from the east on Pine Street (looking west) and from the south on Masonic Avenue (looking north), would be preserved.

Retention of Character-Defining Features

The disposition of the site and landscape features under Alternative C is as follows:

Character-Defining Features	Level of Retention (Alternative C)
Existing Office Building	**Retained**
Stepped multi-story massing built into the natural topography of the site	Retained
Office building encompassing three distinct building phases that have all taken on significance	Mostly retained, partial demolition of east wing
Midcentury Modern architectural style with little ornamentation	Retained
Flat, cantilevered roof with projecting eaves	Retained
Continuous full-height, slightly recessed curtain wall glazing on most sides and along all levels of the building	Replaced with compatible residential window wall system
Glass curtain wall composed of bronze powder-coated aluminum framing system in a regularly spaced pattern of mullions and muntins, typically with a small spandrel panel of obscure glass below a larger pane	Replaced with compatible residential window wall system

(continued)

Character-Defining Features	Level of Retention (Alternative C)
Site and Landscape	**Retained**
Corporate campus setting featuring an office building located on a large, open landscaped site across 10.25 acres	Mostly retained, development limited to four new buildings on the surface parking lots and open areas on the northern and western portions of site
Landscape utilizing curvilinear shapes in pathways, driveways, and planting areas; and other integrated landscape features (planter boxes, seating)	Partially retained
– *elements on northern and western portions of the project site*	– *Demolished*
– *open space/sloped lawns on Laurel Street*	– *Demolished*
– *open space/lawn at Presidio and Masonic avenues*	– *Demolished*
– *elements of the private courtyard/landscaped areas on south and east sides of the existing office building*	– *Retained*
Main entrance leading from Walnut and California streets	Partially retained
Brick perimeter walls, integrated planter boxes, and retaining walls of reinforced concrete and clad in stretcher bond pattern	Retained
– *Perimeter brick wall that borders north and west (partial) boundaries of project site*	– *Mostly demolished, portion along Laurel Street associated with the concrete pergola and terraced landscape retained*
– *Brick retaining walls in the private courtyard/landscaped areas on south and east sides of existing office building*	– *Retained*
Mature trees around the corporate modern campus	Mostly retained, with removal of some mature trees along northern and western portions of project site
Open area along Euclid Avenue and Laurel Street	Retained
Concrete pergola atop terraced planting facing Laurel Street	Retained

Changes to the existing office building under Alternative C would be limited compared to the proposed project and project variant. Changes would include removal of the north-facing entry on its north façade, the northerly extension of the east wing, the exposed concrete piers along with the circular garage ramp structures, and the rooftop mechanical penthouse; the replacement of the existing glass curtain window wall system with a residential-based design; and construction of a one-story addition. The limited demolition would alter the building's historic footprint. The glass curtain window wall system would be replaced with a residential system that would be compatible with the historic character of the resource; e.g. operable windows with small panes divided by a mullion and muntins. The proposed vertical addition would replace the mechanical penthouse level; be flush with the north façade of the office building, and set back 15 feet from the east, west, and south façades of the building. Overall, the proposed addition would increase the height of the existing building (by approximately 12 feet for a total height of approximately 67 feet); however, when viewed from the street level, the vertical addition would appear visually subordinate to the historic portion of the building. Under Alternative C, new construction would be focused on the northern and western portions of the project site including an open space and public access program similar to that of the proposed project and project variant. The southern and eastern portions of the site, including the unimproved grass lawn extending east from Laurel Street and Euclid Avenue to Masonic Avenue and the private courtyards, landscaping, and trees, would be retained in their existing conditions.

Alternative C would include construction of the Plaza A, Plaza B, Walnut and Mayfair buildings and California Street and Mayfair garages on the northern and western portions of the project site as under the proposed project and project variant. The annex building and surface parking lots would be demolished along with the northerly extension of the existing office building's east wing and circular garage ramp structures for the new buildings and parking garages. Existing conditions on the southern and eastern portions of the site would be maintained. Thus, due to the more limited demolition, excavation, and site preparation activities less of the existing building and site and landscape, especially the portion that conveys a park-like setting typical of a corporate campus, would be removed.

Alternative C would also introduce new residential and retail uses to the project site. It would preserve the majority of the character-defining features of the existing office building, including the stepped multi-story massing; the multi-wing footprint; the Midcentury Modern architectural style with little ornamentation; the flat cantilevered roof with projecting eaves; and the varied glass curtain wall and framing system. Alternative C would include demolition that would change the footprint of the existing building. The rooftop addition and replacement of existing mechanical penthouse in tandem with its setbacks would not result in a substantial change to the building's massing. The rooftop addition would have a contemporary design which would distinguish it from the original building, while steel and glazing materials would make it compatible with the original building.

Summary of Ability to Meet Secretary of Interior's Standards for Rehabilitation

As described above, Alternative C would retain most of the existing office building's character-defining features and many of the character-defining features of the site and landscape. The relevant rehabilitation standards are discussed below with a short explanation regarding the alternative's ability to meet the standards. In general, the rehabilitation and adaptive reuse of the office building under Alternative C would conform with the Secretary's Standards.

Rehabilitation Standard 1 states that the "property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces and spatial relationships." As described above, the glass curtain wall system would be replaced with a system compatible with the historic resource. Other changes to the building's historic features would be minimal, i.e., two-story, stepped vertical addition and removal of the northerly extension of the east wing. New buildings with residential and retail uses would also be introduced on the northern and western portions of the site along California and Laurel streets resulting in changes to the site's open areas that create the corporate campus environment. The limited changes to the building when considered together with the limited changes to the site and landscape on the northern and western portions of the 10.25-acre site would not affect the distinctive materials, features, spaces, and spatial relationships of the building, site, and landscape features and therefore would conform with Standard 1.

Rehabilitation Standard 2 states that the "historic character of a property shall be retained and preserved," and "removal of historic materials or alteration of features and spaces that characterize a property shall be avoided." Rehabilitation Standard 5 states that" distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a historic property shall be preserved." Under Alternative C the modifications to the existing building, including minor changes to the building's historic footprint, as described above, would not be substantial. The majority of the existing office building's character-defining features, including the stepped multi-story massing built into the natural topography of the site, the multi-wing footprint, the Midcentury Modern architectural style with little ornamentation, and the flat cantilevered roof with projecting eaves would be retained with minimal to no change. The glass curtain wall system would be replaced with a compatible residential-based design. New infill construction would result in the demolition of some of the curvilinear shapes in pathways, driveways, and planting areas, integrated landscape features such as planter boxes and seating, and brick perimeter walls as well as the removal of some mature trees. However, the proposed site and landscape changes would be restricted to the northern and western portions of the site. When considered together the limited changes to the building, site and landscape features would conform with Standards 2 and 5.

Rehabilitation Standard 9 states that "new additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property," and "new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property." Under Alternative C, as described above, the size, scale, materials, and design of the exterior alterations including the new rooftop addition would distinguish it from the original building yet be compatible with Midcentury Modern design principles. Demolition would be limited such that the change to the building's footprint would not substantially alter the building's general form or massing. Infill construction of four new buildings would demolish most of the curvilinear shapes and hardscape features of the site and landscape on the northern and some on the western portions of the property. The site and landscape features on the southern and western portions of the site would be mostly retained. Thus, when considered together the limited changes to the building and the limited changes to the site and landscape features on the northern and western portions of the 10.25-acre site would conform with Standard 9.

Rehabilitation Standard 10 states that “new additions and adjacent or related new construction shall be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.” Under Alternative C, the demolition of a small portion of the building and the rooftop addition would not represent irreversible changes to the essential form and integrity of the building. When considered together with new construction, which would remove some of the character-defining features of the site and landscape, the essential form and integrity of the Midcentury Modern designed corporate campus and its environment could be restored to its previous state if the new buildings and rooftop addition were to be removed in the future. Therefore, Alternative C would conform with Standard 10.

Conclusion

Alternative C would introduce four new buildings to the project site (nine fewer than under the proposed project or project variant). New construction and changes to the existing office building would result in moderate changes to the distinctive materials, features, spaces and spatial relationships on the northern and western portions of the property. Changes on the northern and western portions of the project site would only affect some of the character-defining site and landscape features.

The loss of these character-defining features on the northern and western portions of the project site, in tandem with the construction of four new buildings, would result in a change to the site features and the spatial relationships that characterize the property. However, the change would be restricted to the northern and western portions of the project site that do not exhibit the most distinctive features and spatial relationships. The southern and eastern portions of the site, where the existing building’s stepped, multi-story massing is integrated with the site’s topography, open spaces with private courtyards, terraced landscaping, and mature trees, and the green lawn extending east along Euclid Avenue present the best example of the integration of the character-defining features of the property.

Because Alternative C would retain and/or rehabilitate most of the character-defining features of the existing building and retain many of the character-defining features of the site and landscape, it would preserve the ability of the property to convey its significance overall. Alternative C would not result in substantial changes to the massing and materiality of the historic building or the relationship between the building and the site and landscape. The changes to the subject property would not affect character-defining features of the project site such that the significance of the historical resource would be “materially impaired.” Thus, on balance, the property would continue to convey its historic and architectural significance as a Midcentury Modern-designed corporate campus. As such, Alternative C would not cause a substantial adverse impact on the historic resource at 3333 California Street. Mitigation Measure M-CR-1a: Documentation of

Historical Resource and Mitigation Measure M-CR-1b: Interpretation of the Historical Resource (see pp. 4.B.45-4.B.46) would not be required for Alternative C.

Off-Site Historic Resources: For the same reasons as the proposed project and project variant, Alternative C would have a less-than-significant impact on off-site historic architectural resources.

Cumulative Impacts: For the same reasons as the proposed project and project variant, Alternative C in combination with other cumulative development in the vicinity would not result in a significant cumulative impact on historic architectural resources.

TRANSPORTATION AND CIRCULATION

Trip Generation

The travel demand for Alternative C was estimated for weekday daily and weekday a.m. and p.m. peak periods. A summary of the resulting external vehicle trips generated under Alternative C is shown in Table 6.7: Alternative C Vehicle-Trip Generation Comparison – External Trips.

Table 6.7: Alternative C Vehicle-Trip Generation Comparison – External Trips

	Daily [NOTE A]	**Weekday AM Peak Hour**	**Weekday PM Peak Hour**
Alternative C	4,156	519	624
Proposed Project	5,760	691	752
Difference [NOTE B]	-1,604 27.8% reduction	-172 24.9% reduction	-128 17% reduction
Alternative C	4,156	519	624
Project Variant	5,744	726	804
Difference [NOTE B]	-1,588 or 27.6% reduction	-207 or 28.5% reduction	-180 or 22.4% reduction

Notes:
[A] The weekday AM peak hour internal trip rate was applied to the daily person-trips to estimate the number of external vehicle trips.
[B] Total reflects external vehicle trips.

Source: *SF Guidelines*, 2002; Kittelson & Associates, Inc, 2018; *3333 California Travel Demand Memo*, March 2018

As shown in Table 6.2, p. 6.16, Alternative C would generate 1,434 external person-trips during the weekday a.m. peak period: 901 auto person-trips (519 vehicle trips), 228 transit trips, 270 walk trips, and 35 trips by other modes. During the weekday p.m. peak period, Alternative C would generate 1,730 external person-trips: 1,082 auto person-trips (624 vehicle trips), 272 transit trips, 328 walk trips, and 48 trips by other modes.

As shown in Table 6.7, Alternative C would generate 172 (approximately 25 percent) and 128 (approximately 17 percent) fewer vehicle trips than the proposed project, respectively, and

207 (approximately 29 percent) and 180 (approximately 22 percent) fewer vehicle trips than the project variant, respectively. As a result, Alternative C would result in reduced operational effects compared to those of the proposed project and project variant.

Construction Transportation

Unlike the proposed project and project variant, Alternative C would be constructed in two phases over 5.5 years. Because of its reduced construction program and shorter duration of construction activities compared to the proposed project and project variant, Alternative C would result in fewer and less substantial construction transportation effects. Therefore, as with the proposed project or project variant, Alternative C would result in a less-than-significant construction-related transportation impact, and Improvement Measure I-TR-1: Project Construction Updates, p. 4.C.74, could be implemented to further reduce the less-than-significant impact.

Operational Impacts

VMT Impacts

The average daily vehicle miles traveled (VMT) per capita for residential uses in Alternative C and per employee for retail uses would be the same as under the proposed project and project variant. The existing average daily VMT per capita for residential and per employee for retail and office uses are more than 15 percent below the existing and future regional averages for the project site's location. The analysis also compares parking rates for Alternative C uses to the neighborhood parking rates for those uses, using the same methodology as for the proposed project, project variant, and all other alternatives, as summarized for Alternative B, p. 6.44. The residential parking rate accounts for residential units in the transportation analysis zone (TAZ) 709 and other nearby TAZs (within three-quarters of a mile based on walking distance) with more distant land use and parking given decreasing weight. The retail parking rate accounts for parking associated with retail uses along California and Sacramento streets near the project site. This information is presented in Table 6.8: Parking Rate Summary for Alternative C.

As shown in Table 6.8, Alternative C would provide parking for residential uses at the same rate as under the proposed project and project variant. Alternative C would provide 175 parking spaces[17] (3.95 spaces per 1,000 square feet) for the retail uses and 29 spaces (1.98 spaces per 1,000 square feet) for the other non-residential (daycare only) use. Alternative C would provide retail parking at a higher rate per square footage of retail space than the proposed project and project variant, respectively. Alternative C would provide other non-residential parking at about the same rate as the proposed project and project variant.

[17] Total includes the 60 public parking (commercial) spaces on the project site.

Table 6.8: Parking Rate Summary for Alternative C

Scenario / Land Use	Size	Vehicle Parking Spaces	Existing Neighborhood Parking Rate	Proposed Parking Rate	Change from Existing
Alternative C					
Residential	534 units	534	0.90	1.00	11%
Retail	44,306 gross square feet	175	1.55	3.95	155%
Other Non-residential	14,650 gross square feet	29	1.44	1.98	37%
Proposed Project					
Residential	558 units	558	0.90	1.00	11%
Retail	54,117 gross square feet	198	1.55	3.66	136%
Other Non-residential	64,689 gross square feet	129	1.44	1.99	38%
Project Variant					
Residential	744 units	744	0.90	1.00	11%
Retail	48,593 gross square feet	188	1.55	3.87	150%
Other Non-residential	14,650 gross square feet	29	1.44	1.98	37%

Notes: The existing parking rate for residential uses reflects data for TAZ 709. The existing parking rate for retail and other non-residential uses reflects data from California and Sacramento Streets, as provided by the planning department. The retail land use category for the proposed project and project variant would include the 60 public parking (commercial) spaces on the project site. Car-share spaces are not included in the parking rate calculation.
Neighborhood Parking Rates:
Residential Parking Rate = 0.9 space/unit (neighborhood)
Retail Rate = 1.55/1,000 square feet (California and Sacramento)
Other Non-Residential Rate = 1.44/1,000 square feet (existing site)

Source: Kittelson and Associates, Inc. 2018; San Francisco Planning Department, 2018.

Provision of retail parking spaces substantially above the neighborhood parking rate for retail use may increase VMT per retail employee enough to exceed the threshold of 15 percent below the regional average. As with the proposed project and project variant, the impact would be significant and implementation of Mitigation Measure M-TR-2: Reduce Retail Parking Supply, p. 4.C.80, would be required to reduce the impact to a less-than-significant level.

Traffic Hazard Impacts

As discussed above, Alternative C would result in between 17 and 29 percent fewer vehicle trips compared to the proposed project and project variant during the weekday a.m. and p.m. peak periods, respectively. Fewer curb cuts would be constructed on Masonic Avenue and Laurel Street compared to the proposed project and project variant, and the existing curb cut on Laurel Street, south of Mayfair Drive, would be retained as the entry/exit driveway to a surface parking lot with 80 parking spaces. As with the proposed project and project variant, the streetscape changes under Alternative C, e.g., the Pine Streets Steps and Plaza at the Presidio Avenue/Pine Street/Masonic Avenue intersection and the removal of the southbound slip lane, would not substantially alter traffic operations. In all other respects the circulation changes would be the same as those for the proposed project or project variant. Therefore, Alternative C would result in slightly reduced operational effects compared to those of the proposed project or project variant (see Impact TR-3, pp. 4.C.81-4.C.83), and traffic hazard impacts would be less than significant. Implementation of Improvement Measure I-TR-3: Driveway Queue Abatement, p. 4.C.82, could further reduce the less-than-significant traffic hazard impacts, as for the proposed project and project variant.

Transit Impacts

As shown in Table 6.2, p. 6.16, Alternative C would generate 228 transit trips in the weekday a.m. peak period and 272 transit trips in the weekday p.m. peak period. During the weekday a.m. and p.m. peak periods, Alternative C would generate 23 percent and 18 percent fewer transit trips than the proposed project, and 30 and 31 percent fewer transit trips than the project variant, respectively.

Alternative C would add 11 riders to the 43 Masonic bus route and, as with the proposed project and project variant, would result in adverse impacts on the 43 Masonic by increasing ridership to exceed the 85 percent capacity utilization during the weekday a.m. peak period under baseline conditions. Therefore, as with the proposed project and project variant, Alternative C would have a significant impact on an individual Muni line. Implementation of Mitigation Measure M-TR-4: Monitor and Provide Fair Share Contribution to Improve 43 Masonic Capacity, pp. 4.C.87-4.C.88, would reduce the impact to less-than-significant levels. A fair share contribution of \$146,063[18] would be conveyed to the SFMTA when monitoring, funded by the project sponsor beginning upon completion and occupancy of the first development phase, shows that capacity utilization has exceeded 85 percent. Similar to the proposed project or project variant, the SFMTA's ability to provide additional capacity or improve transit headways is uncertain; thus, the impact would remain significant and unavoidable after mitigation.

The number of peak hour transit trips on regional carriers would be lower for Alternative C compared to the transit trips generated by the proposed project or project variant. Therefore, Alternative C would have a similarly less-than-significant impact on regional transit routes.

Pedestrian Impacts

As with the proposed project or project variant, Alternative C would include sidewalk widening along Presidio Avenue, Masonic Avenue, Euclid Avenue, and Laurel Street. The number of curb cuts would be reduced under Alternative C. Only one of the two curb cuts on Masonic Avenue between Euclid and Presidio avenues and only one of the seven curb cuts on Laurel Street, south of Mayfair Drive, would be constructed. All corner bulbouts (to shorten crossing distances and provide additional pedestrian space) would be constructed except at the northeast corner of the Laurel Street/Euclid Avenue intersection. The streetscape changes at the intersection of Presidio

[18] EIR Appendix G: Alternatives Analysis – Transportation and Circulation, Transit Capacity Analysis and Fair Share Contribution Calculations, p. 104

Avenue/Masonic Avenue/Pine Street (Pine Street Steps and Plaza), including the roadway changes (e.g., elimination of the southbound slip lane and introduction of pedestrian crosswalk on at the north leg of the intersection) would be implemented; however, the streetscape changes at the intersection of Masonic and Euclid avenues (Corner Plaza) would not be implemented, and the westbound slip lane would not be eliminated.

Under Alternative C, pedestrians would be able to walk onto the project site from California and Walnut streets, Mayfair Drive, and Presidio Avenue/Masonic Avenue/Pine Street. However, unlike the proposed project or project variant, the project site would not be fully integrated with the existing street grid. Pedestrians would not be able to travel through the site to Masonic and Euclid avenues because the southern half of the north-south Walnut Walk would not be developed. Thus, compared to the proposed project or project variant, pedestrian access to the site under Alternative C would not be as complete, and would have fewer access points.

As shown in Table 6.2**,** p. 6.16, Alternative C would generate 498 pedestrian trips (270 walk trips and 228 transit trips) during the weekday a.m. peak hour and 600 pedestrian trips (328 walk trips and 272 transit trips) during the weekday p.m. peak hour. The alternative would generate 173 (26 percent) and 128 (18 percent) fewer pedestrian trips than the proposed project during the weekday a.m. and p.m. peak periods, and 185 (27 percent) and 179 (23 percent) fewer pedestrian trips than the project variant during the weekday a.m. and p.m. peak periods, respectively. The increase in pedestrian trips over existing conditions would be less than that under the proposed project and project variant and, similarly, would not result in substantial overcrowding on public sidewalks. Thus, pedestrian impacts of Alternative C would be reduced from the less-than-significant impacts of the proposed project and project variant.

Alternative C would generate fewer vehicle trips and would have fewer curb cuts than the proposed project and project variant; thus, this alternative would not substantially alter traffic operations such that it would create potentially hazardous conditions for pedestrians. As with the proposed project and project variant, the proposed streetscape changes would not create hazardous conditions or accessibility impacts for pedestrians. Thus, pedestrian impacts under Alternative C, as with the proposed project and project variant, would be less than significant. Implementation of Improvement Measure I-TR-3: Driveway Queue Abatement, p. 4.C.82, would further reduce the less-than-significant pedestrian impacts.

Bicycle Impacts

Unlike the proposed project or project variant, under Alternative C only one of the two curb cuts on Masonic Avenue and only one of the seven curb cuts on Laurel Street, south of Mayfair Drive, would be constructed. Thus, the number of driveway conflict points would be reduced in comparison to the proposed project and project variant. Without the complete Walnut Walk, bicycle accessibility to and through the site would be more limited than with the proposed project or project variant.

With fewer vehicle trips than the proposed project and project variant, changes in local traffic operations would not be as substantial under Alternative C as those under the proposed project and project variant, and the potential to create hazardous conditions or interfere with bicycle accessibility would be reduced. Thus, under Alternative C bicycle impacts associated with project-related hazardous conditions or interference with bicycle access to the site or adjoining areas would remain less than significant, as under the proposed project and project variant. Similarly, implementation of Improvement Measure I-TR-3: Driveway Queue Abatement, p. 4.C.82, would further reduce the less-than-significant bicycle impacts.

Loading Impacts

FREIGHT LOADING

Alternative C would generate an average and peak hour demand of four and five freight loading spaces respectively, one less than the proposed project and project variant. Under Alternative C, three (not six) off-street freight loading spaces would be developed. As with the proposed project and project variant, the conversion of five on-street parking spaces to one 100-foot-long on-street commercial loading zone would be requested. This commercial loading zone could accommodate up to three delivery vans or single-unit trucks (e.g., FedEx, Amazon Fresh) which are typically about 30 feet long. In combination, there would be six loading spaces under Alternative C. As with the proposed project and project variant, under Alternative C, the supply would meet demand and the freight loading impact would be less than significant. Similarly, implementation of Improvement Measure I-TR-9a: Schedule and Coordinate Deliveries and Improvement Measure I-TR-9b: Monitor Loading Activity and Implement Loading Management Strategies as Needed would further reduce the less-than-significant freight loading impacts (see pp. 4.C.97-4.C.98).

PASSENGER LOADING

Alternative C would generate 35 passenger drop-off/pick-up trips (16 drop-off, 19 pick-up) during the weekday a.m. peak period and 48 passenger drop-off/pick-up trips (27 drop-off, 21 pick-up) during the weekday p.m. peak period. This demand is equivalent to 60 linear feet (or 3 spaces) during the peak hour of demand. Unlike the proposed project or project variant, under Alternative C the project sponsor would seek the conversion of seven on-street parking spaces (not ten) into one (not three) 60-foot-long passenger loading zone. Passenger loading would also occur within Basement Level B3 of the California Street Garage (associated with the daycare use as with the proposed project or project variant), at the proposed roundabout at the terminus of the Walnut Street extension, and in the retained surface parking lot along Laurel Street. As with the proposed project and project variant, under Alternative C, the proposed supply would meet demand and the passenger loading impact would be less than significant.

Emergency Access Impacts

Under Alternative C emergency vehicles would continue to have access to the perimeter of the project site and would have access the center of the site via the Walnut Street extension and the west end of Mayfair Walk. As with the proposed project and project variant, emergency access impacts would be less than significant.

Cumulative Impacts

Compared to the proposed project and project variant, Alternative C would have less construction and a smaller land use program. Therefore, as with the proposed project and project variant, Alternative C, in combination with past, present and reasonably foreseeable development in the project vicinity, would result in a less-than-significant cumulative construction-related transportation impact and less-than-significant 2040 cumulative impacts related to traffic hazards, transit, pedestrians, bicycles, loading, and emergency access.

The incremental effects of Alternative C on regional VMT would be significant, when viewed in combination with past, present, and reasonably foreseeable future projects and the goal to remain at or below 15 percent below the regional VMT average. As with the proposed project and project variant, Alternative C would contribute to this cumulative VMT impact as a result of the provision of a retail parking supply substantially above the neighborhood parking rate for retail uses. Implementation of Mitigation Measure M-TR-2: Reduce Retail Parking Supply, p. 4.C.80, would reduce the proposed retail parking supply to a level that would not substantially increase VMT, resulting in a less-than-significant cumulative VMT impact. Therefore, like the proposed project and project variant, Alternative C with implementation of the mitigation measure M-TR-2 would not make a considerable contribution to cumulative increases in VMT.

NOISE AND VIBRATION

Under Alternative C, there would be a similar amount of demolition, ground disturbance, and construction as the proposed project and project variant on the northern portion of the project site along California Street, more limited construction activity along Laurel Street, and no change to existing conditions on the southern portion of the project site fronting Euclid Avenue, and Masonic and Presidio avenues (see Figure 6.7, p. 6.72, and Figure 2.22, p. 2.52). The existing office use would be discontinued with the adaptive reuse of the existing building for residential use, and land uses in the Plaza A, Plaza B and Walnut buildings would include residential, retail, and daycare uses, as under the project variant. The Mayfair Building would be a multi-family residential building as with the proposed project and project variant.

Construction Noise

Under Alternative C, the construction program would be shorter (5.5 years) than that for the proposed project or project variant and would be completed in two phases rather than four. However, the type of construction equipment and use characteristics would not change because demolition, excavation, and construction activities, even though more limited, would still occur. Thus, the potential to generate substantial temporary noise increases of at least 10 dBA over ambient levels at off-site locations along California Street, Euclid Avenue, and Laurel Street would remain (see Impact NO-1, pp. 4.D.36-4.D.47), and the noise impact would continue to be significant and unavoidable.

Similar to the proposed project or project variant, temporary construction-related noise impacts at off-site sensitive receptor locations along California Street, Euclid Avenue, and Laurel Street would generate noise increases over ambient levels of 10 dBA along California Street, 16 dBA along Euclid Avenue, 17 dBA along Laurel Street, and 5 dBA along Presidio Avenue. With a construction program limited to the northern portion of the site along California Street and Laurel Street (near Mayfair Drive) and a shorter, two-phase construction schedule, the number of temporary construction-related noise events that could affect off-site sensitive receptor locations would be reduced from that of the proposed project or project variant. However, similar construction activities would occur, e.g., the use of excavators with hoe rams to fracture and remove bedrock as part of the excavation for the California Street and Mayfair Building garages. Thus, under Alternative C, off-site sensitive receptors along the north side of California Street and east side of Presidio Avenue would be exposed to noise levels similar to those that would be generated under the proposed project or project variant. The off-site sensitive receptors along the west side of Laurel Street and south side of Euclid Avenue would be exposed to similar but slightly lower noise levels because less construction would occur on the western and southern portions of the project site. Thus, these off-site sensitive receptors would not be as directly exposed to the temporary, construction-related noise increases because of the slightly greater distance from, and the more limited nature of, the construction activities. However, impacts under Alternative C (although more limited in terms of the number of events) would remain significant. Implementation of Mitigation Measure M-NO-1: Construction Noise Control Measures (see pp. 4.D.42-4.D.43) would reduce but not eliminate the significant impact.

Overlapping construction phases under Alternative C would result in occupancy of the center building during the second construction phase. However, the resulting exposure of sensitive receptors to construction noise would be more limited under Alternative C compared to the proposed project or project variant. As identified for the proposed project or project variant, temporary construction-related noise during the second phase would be noticeable at on-site sensitive receptors occupying the adaptively reused center building renovated in the first phase (see Impact NO-1, pp. 4.D.47-4.D.49), with construction noise levels of up to 78 dBA (see Table 4.D.14, p. 4.D.48). As with the proposed project or project variant, construction activities during second phase of Alternative C could generate a persistent noise increase of 10 dBA or greater above ambient levels at the occupied building. Therefore, as with the proposed project or project variant, impacts would be significant and implementation of Mitigation Measure M-NO-1 would be required.

As with the proposed project or project variant, construction noise impacts at off-site and on-site locations under Alternative C would remain significant and unavoidable with implementation of Mitigation Measure M-NO-1. Although the noise reduction strategies identified under Mitigation Measure M-NO-1 would not reduce the construction noise impact at off-site and on-site locations to less-than-significant levels, it would further reduce the less-than-significant noise impacts related to compliance with local standards for construction noise from non-impact equipment.

With a more limited construction program and shorter construction schedule, there would be less excavated material hauled off-site, fewer concrete truck trips, and less material delivered to the site (i.e., fewer haul/concrete/delivery truck trips) under Alternative C than the proposed project or project variant. Thus, construction-related noise attributable to construction truck traffic on local roadways would be reduced in comparison to the proposed project or project variant, and, like the proposed project or project variant, would be a less-than-significant impact.

Construction Vibration

Under Alternative C, as with the proposed project or project variant, construction activities that generate groundborne vibration would occur, e.g., the use of excavators and vibratory rollers, and the potential for structural damage to adjacent structures would remain. Thus, under Alternative C, as with the proposed project or project variant, construction-related groundborne vibration impacts on the adjacent SF Fire Credit Union building would also be significant and implementation of Mitigation Measure M-NO-2: Vibration Monitoring Program for SF Fire Credit Union Building (see pp. 4.D.55-4.D.56) would be required. With implementation of Mitigation Measure M-NO-2, the significant impact on the SF Fire Credit Union Building would be reduced to a less-than-significant level, as it would with mitigation under either the proposed project or project variant.

Operational Noise

Stationary Equipment

Under Alternative C, the emergency diesel generator that serves the existing office building would be relocated from the easternmost circular garage ramp at Basement Level 1 to a different location within the retained parking garage under the existing building. HVAC equipment for the Mayfair, Plaza A, Plaza B and Walnut buildings would be located on the rooftops. As with the proposed project or project variant, Mitigation Measure M-NO-3: Stationary Equipment Noise Controls (see p. 4.D.60) would still be required under Alternative C for rooftop equipment to ensure that proper enclosures or other sound muffling measures would be implemented to meet regulatory requirements established in the Noise Ordinance. Therefore, like the proposed project or project variant, under Alternative C this impact would be mitigated to a less-than-significant level with implementation of Mitigation Measure M-NO-3.

Traffic

As shown in Table 6.7, p. 6.81, Alternative C would generate 1,604 fewer vehicle trips per weekday than the proposed project and 1,588 fewer vehicle trips per weekday than the project variant (a 28 percent reduction relative to the proposed project's or project variant's vehicle trips). Under the proposed project or project variant, traffic noise increases of 1 dBA or less were identified, and the impact was determined to be less than significant (see Impact NO-4, pp. 4.D.62-4.D.64). With less traffic generated under Alternative C, any incremental increase in traffic noise along affected local streets would also be less than significant.

Land Use Compatibility

Like the proposed project or project variant, Alternative C would result in the introduction of new residential land uses along California and Laurel streets. Unlike the proposed project or project variant, fewer new residential buildings would be developed along the perimeter of the site. Alternative C would be expected to have similar noise compatibility concerns with future noise levels as those identified for the proposed project or project variant, which were determined to be less-than-significant impacts (see Impact NO-5, pp. 4.D.64-4.D.67).

Cumulative Impacts

No significant cumulative construction noise impacts were identified in the analysis for the proposed project or project variant when considered in combination with cumultive projects in the vicinity. Since construction-related noise and vibration impacts under Alternative C would be similar to those of the proposed project or project variant, construction-related cumulative noise impacts under Alternative C would also be less than significant (see Impact C-NO-1, pp. 4.D.68-4.D.70). Under 2040 cumulative conditions with operation of the proposed project or project variant, traffic noise increases of 2 dBA or less were identified, and the cumulative impact was determined to be less than significant (see Impact C-NO-2, pp. 4.D.7`-4.D.72). Thus, any incremental increase in cumulative traffic noise levels along affected local streets associated with cumulative growth and the reduced land use program for Alternative C, which would generate less traffic than the proposed project or project variant, would also be less than significant.

AIR QUALITY

Alternative C would reduce the total gross square feet of floor area compared to the proposed project and project variant (approximately 17 and 23 percent less, respectively). Thus, under

Alternative C, there would be less demolition, ground disturbance, and construction than under the proposed project or project variant. Along the northern portion of the project site, demolition, ground disturbance, and construction would be similar to that under the proposed project or project variant.

The emergency diesel generator would be relocated within the retained parking garage under the adaptively reused building and replaced with a new similarly-sized emergency diesel generator.

Construction would be completed in 5.5 years and there would be a single overlap of construction with occupancy of the adaptively reused building while excavation and construction of the Mayfair and California Street buildings and associated subterranean garages were completed. Thus, under Alternative C, as with the proposed project or project variant, there would be on-site sensitive receptors on the project site during construction of a subsequent phase; however, overlaps under Alternative C would be reduced as there would be two fewer phases of the construction program compared to the proposed project or project variant.

Construction

As described under Impact AQ-1, pp. 4.E.47-4.E.49, estimated construction-related emissions of criteria air pollutants for the proposed project or project variant would not exceed the applicable construction-related significance thresholds for reactive organic gases (ROG), nitrogen oxides (NOx), and particulate matter (PM). Under the more limited construction program of Alternative C, the average daily and average annual construction-related criteria air pollutant emissions would be reduced in comparison to the proposed project or project variant and also would not exceed BAAQMD thresholds.[19] Thus, as for the proposed project and project variant, construction-related emissions of criteria air pollutants would result in a less-than-significant air quality impact.

Operations

As described under Impact AQ-2, pp. 4.E.49-4.E.52, the air quality impacts associated with estimated operational emissions of criteria air pollutants for the proposed project or project variant would not exceed the applicable significance thresholds for ROG, NOx, and PM. Because of the reduced land use program under Alternative C (e.g., fewer buildings and no upsizing for the on-site emergency diesel generator) there would be fewer area, stationary, and building energy sources of emissions, and, consequently, lower operational emissions compared to the proposed project or project variant. Alternative C would also generate fewer vehicle trips and thus lower

[19] This was determined by dividing the new gross square feet of construction for Alternative C (total gross square feet minus existing gross square feet) by the number of years of construction (5.5) and comparing this to the same ratio for the proposed project and project variant. This assumes construction emissions are directly proportional to new gross square footage.

mobile emissions. As shown in Table 6.7, p. 6.81, Alternative C would generate 1,604 fewer vehicle trips per weekday than the proposed project and 1,588 fewer vehicle trips per weekday than the project variant (a 28 percent reduction relative to proposed project's vehicle trips). Therefore, the average daily criteria air pollutant emissions attributable to project operations under Alternative C would be reduced in comparison to the proposed project or project variant, and, like the proposed project or project variant, would result in a less-than-significant impact.

Toxic Air Contaminants

Similar to the proposed project or project variant, construction and operation of Alternative C would generate toxic air contaminants, including diesel particulate matter. Under Alternative C, the existing emergency diesel generator would be replaced with one of a similar size in a different part of the retained parking garage rather than a larger version as under the proposed project or project variant in the Masonic Garage, which would not be constructed under this alternative. As noted above, Alternative C would generate approximately 28 percent fewer vehicle trips than the proposed project or project variant. Thus, under the reduced construction and land use programs of Alternative C, less construction and operational exhaust-emitted $PM_{2.5}$ and diesel particulate matter emissions would be generated than under the proposed project or project variant. As with the proposed project or project variant, project contributions, when added to background values, would not result in a significant health impact at the maximally exposed off-site and on-site receptors.[20] As with the proposed project or project variant, annual average $PM_{2.5}$ contributions would be almost all from background, and excess cancer risk values would be well below thresholds (see Table 4.E.10, p. 4.E.58). Therefore, like the proposed project or project variant, TAC emissions would not result in off- or on-site sensitive receptor locations newly meeting the Air Pollutant Exposure Zone criteria for annual average $PM_{2.5}$ concentrations and excess cancer risk and would be less than significant.

Consistency with Clean Air Plan

As with the proposed project or project variant (see Impact AQ-4, pp. 4.E.60-4.E.65), Alternative C would support the primary goals of the *2017 Bay Area Clean Air Plan* and would include the plan's applicable transportation sector, building sector, energy sector, natural and working lands sector, waste sector, and water sector control measures. Under Alternative C there would be fewer vehicle trips and the existing emergency diesel generator would be replaced by a similarly sized and newer model, resulting in fewer emissions. Under Alternative C, as with the proposed project or project variant, a transportation demand management program would be

[20] This was determined by quantitatively comparing the exposure parameters for the decreased construction duration and the ratio of construction emissions assumed based on the total gross square footage. Because the generator would be in a different location under this alternative compared to the proposed project and project variant, and construction activities would also be in different locations, the location of the maximally exposed individual sensitive receptors would likely change.

developed to promote the use of transit, walking and bicycling as viable options to privately owned vehicles, pursuant to city ordinance. In addition, Mitigation Measure M-TR-4 would be implemented to improve local bus service. Therefore, Alternative C would not conflict with or obstruct implementation of the *2017 Bay Area Clean Air Plan*, and this impact, as with the proposed project or project variant, would be less than significant.

Odors

Although there may be some potential for small-scale, localized odor issues around the construction site or the proposed site uses under Alternative C, e.g., from construction site activities and solid waste collection, substantial odor sources and consequent effects on sensitive receptors would be unlikely. Therefore, like the proposed project or project variant, Alternative C would not create objectionable odors that would affect a substantial number of people.

Cumulative Air Quality Impacts

As explained for the proposed project and project variant (see Impact C-AQ-1, p. 4.E.66), the contribution of a project's individual air pollutant emissions to regional air quality impacts is, by its nature, a cumulative effect. As with the proposed project or project variant, the air quality impacts of Alternative C would be less than significant. Therefore, Alternative C would not contribute considerably to significant cumulative regional air quality impacts.

Although there would be less construction and fewer operational emissions, including fewer vehicle trips, Alternative C would result in a slightly reduced but similar cumulative health risk impact to the impact of the proposed project or project variant, which was determined to be less than significant. As discussed for the proposed project or project variant (p. 4.E.68), 2040 cumulative heath risk modeling is based on growth projections that reasonably accounted for the traffic emissions from the reasonably foreseeable projects listed in Section 4.A, Introduction to Chapter 4, pp. 4.A.7-4.A.13. That modeling shows future background risks at some receptors are projected to be reduced in 2040 compared to existing conditions (2014 risks) as a result of improved vehicle fleets. Therefore, the higher 2014 background risks were used as the worst-case scenario for each receptor and were combined with the proposed project's or project variant's contribution to determine whether there would be significant cumulative impacts and if so, whether the proposed project's or project variant's contribution would be considerable. The maximum health risks for Alternative C would likely be less than the maximum health risks from the proposed project or project variant since overall emissions would be lower. As with the proposed project or project variant, the addition of the health risks associated with Alternative C to the worst-case 2014 background scenario would also not exceed thresholds and would not result in the expansion of mapped Air Pollutant Exposure Zones. Thus, under Alternative C, as with the proposed project or project variant, cumulative construction and operational related air quality impacts would be less than significant, and mitigation would not be needed.

INITIAL STUDY TOPICS

Land Use and Planning

Alternative C would be a new mixed-use development within an existing city block. The east-west running Mayfair Walk would be constructed (as under the proposed project or project variant) but the north-south Walnut Walk would not be. Without Walnut Walk, Alternative C would provide less integration with the surrounding neighborhood than the proposed project or project variant (see Topic E.1, Land Use and Planning, of the initial study, pp. 110-112). In all other respects, Alternative C would have the same less-than-significant project-level impacts as identified for the proposed project and project variant, and would not combine with other cumulative land use changes in the vicinity to generate a significant cumulative land use and land use planning impact.

Population and Housing

Alternative C would introduce 1,207 new residents to the site, a reduction of 54 residents and 474 residents from the proposed project and project variant, respectively. The mix of uses under Alternative C would be similar to the proposed project's and project variant's mix of uses except that there would be no office-related employment. Employment numbers would be similar to, or less than, those of the proposed project and project variant. Although Alternative C would eliminate existing jobs on site, these existing onsite employees would be moved to another UCSF campus location within the city. Overall, the land use program and the total square footage of uses would be smaller than with the proposed project or project variant.

Like the proposed project or project variant, which would have less-than-significant population and housing impacts as described in Topic E.2, Population and Housing, of the initial study (pp. 112-120), this alternative would not induce substantial population growth, would not generate a substantial increase in employment-related housing demand, and would not displace any existing housing units. As such, Alternative C would have less-than-significant project-level impacts and, with a slightly reduced land use program compared to the proposed project and project variant, would not combine with other cumulative projects in the vicinity and at the citywide level to create a significant population and housing cumulative impact.

Cultural Resources (Archaeological Resources)

Alternative C would have somewhat less but similar project-level and cumulative impacts on archaeological resources (including human remains and tribal cultural resources) as those identified for the proposed project and project variant, and substantially the same as those under Alternative B on pp. 6.38-6.42. The mitigation measures identified in the initial study on pp. 129-133 and p. 135 would continue to apply and would reduce the impact of the alternative to a less-than-significant level, as for the proposed project and project variant, and its contribution to the identified significant cumulative impact related to subsurface archaeological resources associated with the Laurel Hill Cemetery to less than considerable.

Greenhouse Gas Emissions

Alternative C would include approximately 17 percent less floor area than the proposed project and 23 percent less than the project variant; the construction program and development footprint would be smaller than the proposed project or project variant; and more of the existing building would be retained. Therefore, this alternative would result in fewer construction and operation-related greenhouse gas emissions compared to the proposed project and project variant. Compliance with applicable regulations and requirements that reduce GHG emissions would ensure that Alternative C would be consistent with the City's GHG reduction strategy as well as regional and state plans related to GHG emissions reduction efforts (see Topic E.7, Greenhouse Gas Emission, of the initial study, pp. 146-150). Thus, as with the proposed project or variant, cumulative impacts related to GHG emissions would be less than significant.

Wind and Shadow

Under Alternative C, the Plaza A, Plaza B, Walnut, and Mayfair buildings would be the same heights as in the project variant. The Laurel Duplexes and the Masonic and Euclid buildings would not be built. The retained existing building at the center of site would be approximately 25 feet shorter than under the proposed project or project variant.

Wind

Under Alternative C wind conditions along the public sidewalks on California and Laurel streets would be altered similar to the proposed project and project variant. However, as with the proposed project or project variant, any incremental changes to wind speeds would not exceed the wind hazard criterion. Wind conditions at other locations adjacent to the project site would be more similar to existing conditions because new construction would be restricted to the northern and western portions of the site with minor changes along Laurel Street due to the development of the Mayfair Building only. Thus, any changes to wind speeds on adjacent public sidewalks and public use areas attributable to Alternative C would not be as substantial as those under the proposed project or project variant. Therefore, as with the proposed project or project variant, wind impacts under Alternative C would be less than significant and would not combine with other cumulative projects in the vicinity to generate a significant cumulative impact related to wind.

Shadow

Under Alternative C, building height at the center of the site would be approximately 25 feet lower than under the proposed project and project variant (reduced from 92 feet to 67 feet).

Therefore, it would cast shorter shadows than the proposed project or project variant and would not shade public open space. Shadow cast on public sidewalks would not be as extensive because fewer buildings would be constructed along the perimeter of the site. Therefore, as with the proposed project or project variant, shadow impacts under Alternative C would be less than significant and would not combine with other cumulative projects in the vicinity to create a significant cumulative impact related to shadow.

Recreation

Alternative C would have a smaller development footprint and would retain more of the existing on-site open space than the proposed project or project variant. Office uses would not be retained but similar retail and daycare uses would be developed. The residential population on the project site would be reduced, with 54 fewer residents compared to the proposed project and 474 fewer residents compared to the project variant. Similar to the proposed project and project variant, Alternative C would develop common and private open space to accommodate new residential uses. Like the proposed project and project variant, which would have less-than-significant recreation impacts as described in Topic E.9, Recreation, of the initial study (pp. 163-170), this alternative would not increase the use of recreational facilities thereby accelerating physical deterioration of the facilities; would not require construction of new or expanded recreational facilities; and would not physically degrade existing recreational resources. As such, Alternative C would have less-than-significant project-level impacts, and, with a reduced land use program, would not combine with other project in the vicinity to generate significant cumulative recreation impacts.

Utilities and Service Systems

Similar to the proposed project and project variant, development under Alternative C would trigger the requirements of the City's Stormwater Management Requirements and Design Guidelines, and stormwater flows to the combined sewer system would be reduced by 25 percent. There would be fewer residents than with the proposed project and the project variant, and no office employees. With these reductions in residents and employees, project-level impacts on utilities and service systems would be less-than-significant. Similarly, Alternative C would not combine with other cumulative projects in the vicinity and at the citywide level to generate a significant cumulative impact related to utilities and service systems.

Public Services

Alternative C would have fewer residents than the proposed project and the project variant. Like the proposed project and project variant, Alternative C would have less-than-significant project-level impacts, and would not combine with cumulative projects in the vicinity and at the citywide level to generate a significant cumulative impact related to public services (see initial study Section 11, Public Services, pp. 189-197, supplemented in EIR Section 4.F).

Biological Resources

Alternative C would reduce impacts on biological resources because it would result in less ground disturbance, remove fewer trees and vegetation, and have a reduced overall construction program compared to the proposed project and project variant. Unlike the proposed project and project variant, a skybridge would not be constructed because the existing building would not be separated. The discussion of project-level and cumulative biological resources impacts for the proposed project and project variant on initial study pp. 197-204, the mitigation measure identified to reduce the project-level impact on nesting birds, and the conclusion of less-than-significant impacts with mitigation are applicable to Alternative C. Like the proposed project, Alternative C would not combine with cumulative projects in the vicinity of the city, or at the citywide level, to create a significant cumulative biological resources impact.

Geology and Soils

Alternative C would involve less excavation and soil disturbance and would have a smaller development footprint compared to the proposed project and project variant. As with the proposed project and project variant, Alternative C would require mitigation in the event of inadvertent discovery of paleontological resources (see initial study pp. 214-215). All other geology and soils issues would be the same as discussed for the proposed project and project variant in the initial study (pp. 205-216) and for Alternative B on pp. 6.60–6.61. Additions to the existing building and all new construction would be subject to the San Francisco and/or Historical Building codes. Project-level and cumulative impacts would remain less than significant.

Hydrology and Water Quality

The Alternative C development footprint would be smaller than that for the proposed project or project variant, and there would be less ground disturbance with fewer changes to the existing site. Therefore, impacts on hydrology and water quality during construction would remain less than significant as for the proposed project and project variant, as concluded in the initial study (see Topic E.14, Hydrology and Water Quality, pp. 216-227).

Other impacts related to hydrology and water quality would be similar to those identified for the proposed project or project variant, as discussed above for Alternative B on pp. 6.61-6.62, and the project-level and cumulative impacts would be less than significant.

Hazards and Hazardous Materials

Under Alternative C the demolition, excavation, and construction program and development footprint would be smaller than the proposed project and project variant. The existing annex building would be demolished. The existing office building would be retained with limited demolition in comparison to the proposed project and project variant for its adaptation for residential use.

Alternative C would involve the removal of hazardous building materials and soils as with the proposed project or project variant. The volume of demolished building materials and excavated soils that would be classified as hazardous waste would be similar. Excavation for the California Street Garage, and in particular the northwest corner (Plaza A Building) of the site, would be in areas where known hazardous contaminants persist in the subsurface soils due to historic uses on the site, and in areas where serpentinite (typically containing naturally occurring asbestos) may be encountered, as with the proposed project or project variant. The overall excavation program under Alternative C would be more limited than for the proposed project or project variant, so the potential to encounter naturally occurring asbestos would also decrease. Alternative C would be subject to the same regulatory requirements associated with the routine handling, transport, and disposal of hazardous materials, and the project sponsor would be required to create and implement a site mitigation plan, construction dust control plan, and asbestos dust control plan. Current UCSF laboratory uses would be removed in accordance with UC requirements and California Department of Public Health regulations for the closure and transport of hazardous materials associated with the laboratory use. For these reasons, as with the proposed project or project variant, hazardous materials impacts would be less than significant. Use of common hazardous materials during operation would continue to result in less-than-significant impacts.

Access to the site perimeter and into the site would be similar to the proposed project and project variant (i.e., Walnut Street extension and Mayfair Walk). Therefore, like the proposed project or project variant, Alternative C would not interfere with an adopted emergency response plan or emergency evacuation plan and the impact would be less than significant.

Like the proposed project and project variant (see Topic E.15, Hazards and Hazardous Materials, of the initial study, pp. 227-240, supplemented in Section 4.F), Alternative C would also have less-than-significant project-level impacts related to hazards and hazardous materials, and would not contribute to a significant cumulative impact related to hazards and hazardous materials because no cumulative hazards and hazardous materials impact was identified in the initial study.

Mineral and Energy Resources

Similar to the proposed project and project variant, Alternative C would have no impact on a mineral resource. As discussed for the proposed project and project variant, impacts on energy resources would be less than significant.

Agricultural and Forest Resources

As with the proposed project and project variant, Alternative C would have no impacts related to agricultural and forest resources.

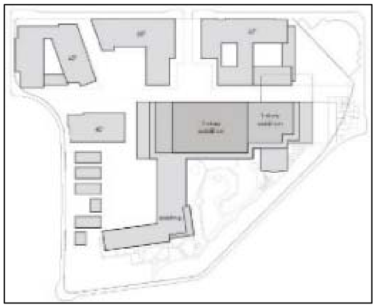
CONCLUSION

By retaining most of the character-defining features of the historic resource at 3333 California Street and rehabilitating the building in accordance to the Secretary's Standards, Alternative C, unlike the proposed project or project variant, would result in a less-than-significant impact on historic architectural resources. Although new development and interventions into the existing building would represent changes to some of the character-defining features of the property, it would not materially impair the property's ability to convey its significance.

Under Alternative C, the VMT impact would be reduced to a less-than-significant level with mitigation, the same as for the proposed project or project variant. Like the proposed project or project variant, Alternative C would generate significant and unavoidable impacts related to transportation and circulation (transit capacity) and construction noise, although the transit impact would be reduced somewhat by the less intense development and the number of significant construction-related noise events would be reduced as a result of a shorter overall construction duration. With regard to construction vibration (damage to off-site structures), and operational noise (stationary sources), impacts would be less than significant with mitigation, the same as under the proposed project or project variant. As with the proposed project or project variant, air quality impacts under Alternative C would be less than significant.

Under Alternative C, no other significant impacts beyond those identified in the initial study for the proposed project or project variant, e.g. archaeological resources (including those related to human remains and tribal cultural resources), biological resources, and paleontological resources would occur. As with the proposed project or project variant, the same mitigation measures found in the initial study would be applicable to this alternative and these impacts would be reduced to less-than-significant levels.

E. ALTERNATIVE D: PARTIAL PRESERVATION - OFFICE ALTERNATIVE

Overview: 	Existing office building retained and office use continued. Stepped, two-story addition constructed on roof. Annex building demolished. Parking garage under existing building partly retained. Ten new buildings (Plaza A, Plaza B, and Walnut buildings; Mayfair Building; and six Laurel Duplexes) constructed along California and Laurel streets. Mayfair Walk developed. California Street and Mayfair garages and five garages for the Laurel Duplexes constructed. Uses: Residential, office, retail, parking, and daycare.
Character-Defining Features Retained:	Character-defining features of existing building retained and rehabilitated. Site and landscape features contributing to corporate campus setting partially retained. View of project site from the east on Pine Street (looking west) and from the south on Masonic Avenue (looking north) toward the existing office building and open landscaped areas retained with minimal change.
General Comparison to Proposed Project and Variant:	• Center building as office, not residential, with a two-story addition rather than two to three stories. Replaces glass curtain wall glazing in-kind, rather than altered for residential use. • Plaza A and B buildings 20 feet taller. • Walnut Building 67 feet tall as in project variant. • Six Laurel Duplexes developed rather than seven, with modified footprints. • More office space and fewer residential units. • Land use program reduced. • No north-south Walnut Walk connecting to existing street grid. • More on-site parking; lower parking rates for non-residential uses. • One less curb cut each on Masonic Avenue and Laurel Street. • No improvements to grass lawn at Euclid Avenue and Laurel Street.

LAND USE PROGRAM

Alternative D would have a total of 1,348,702 gross square feet of new and rehabilitated space, as follows:

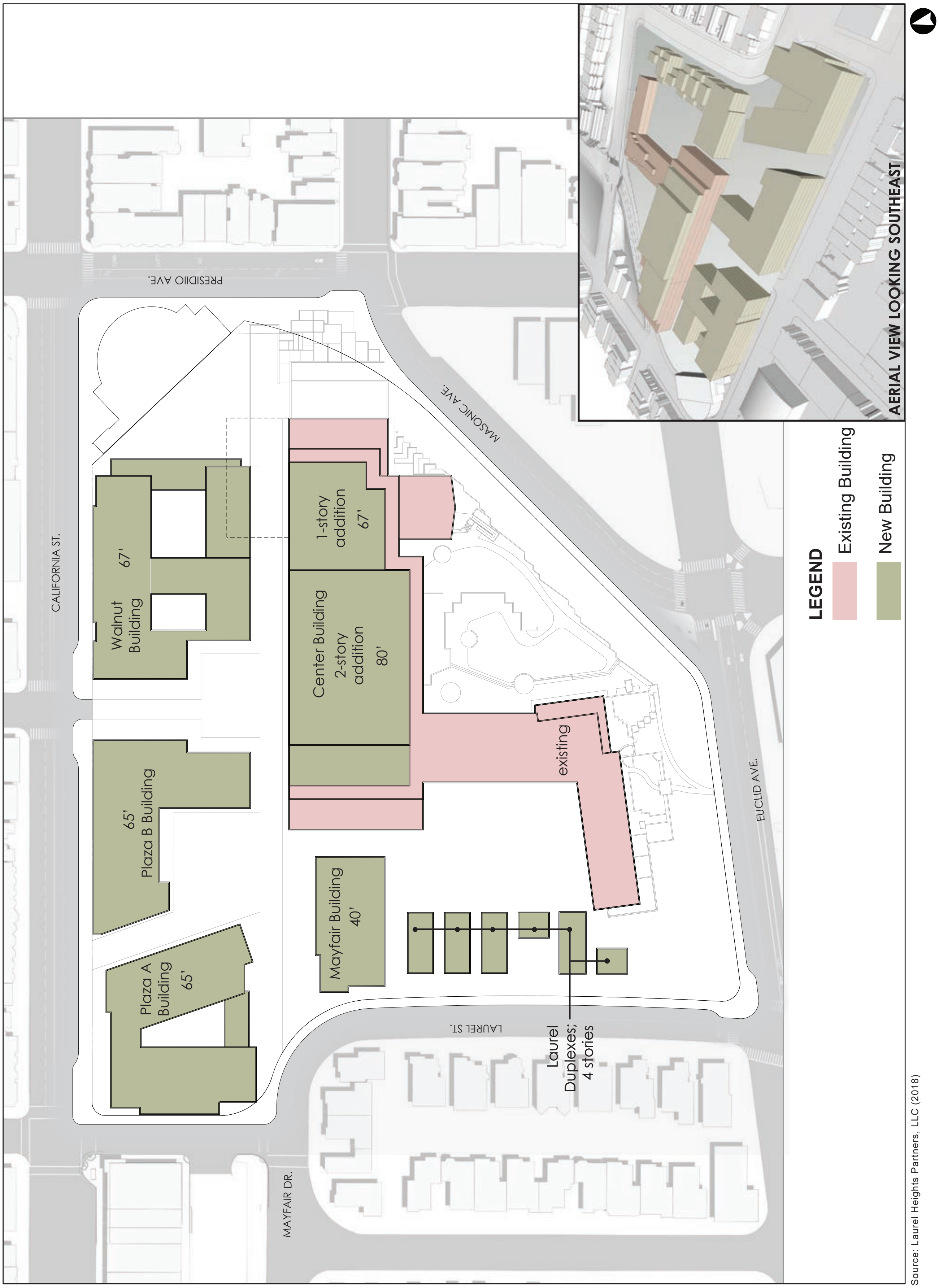
- 475,247 gross square feet of residential floor area (456 residential units)
- 402,404 gross square feet of office floor area
- 44,306 gross square feet of ground-floor retail spaces
- 14,650 gross square feet of daycare center space
- 412,095 gross square feet of parking

Office uses would be located in the existing building and the residential, retail, and child care uses would be located in the Plaza A, Plaza B, and/or Walnut buildings. The Mayfair Building and the Laurel Duplexes would be developed for residential uses only. The new California Street and Mayfair garages, the retained parking garage under the existing office building, and the individual parking garages for the Laurel Duplexes would provide up to 1,132 vehicle parking spaces, including 16 car-share spaces. See Table 6.1, pp. 6.13-6.15.

The overall land use program would be slightly reduced compared to the proposed project (2 percent) and project variant (9 percent), with less residential development, more office space, and similar amounts of retail and child care space.

OVERVIEW

Under Alternative D, the existing office building would be mostly retained for continued office use and altered with minor demolition. A two-story addition would be added to the roof to expand the office use. As shown on Figure 6.8: Alternative D: Partial Preservation - Office Alternative Site Plan, new construction on the project site would be limited to the northern and western portions of site. As under the project variant, three new mixed-use multi-family residential buildings with ground-floor retail (the Plaza A, Plaza B, and Walnut buildings), one new multi-family residential building (the Mayfair Building), and two garages (the California Street and Mayfair garages) would be constructed. The annex building, circular garage ramp structures, surface parking lots, and open and landscaped areas on the northern portion of the site along California and Laurel streets would be demolished to make way for the new construction. On the western portion of the site along Laurel Street and south of Mayfair Drive, the concrete pergola, terraced formal landscaping, brick retaining wall, and surface parking would be removed; however, development would not be as extensive as it would under the proposed project or project variant because one fewer Laurel Duplex would be constructed and footprints would be slightly different. Existing conditions on the southern and eastern portions of the project site would be maintained.



Source: Laurel Heights Partners, LLC (2018)

3333 CALIFORNIA STREET MIXED-USE PROJECT

2015-014028ENV

FIGURE 6.8: ALTERNATIVE D: PARTIAL PRESERVATION - OFFICE ALTERNATIVE SITE PLAN

The view through the project site to the existing building from Laurel Street (looking west) would be altered with development of the Mayfair Building and Laurel Duplexes. The most prominent views of the project site, from the east on Pine Street (looking west) and from the south on Masonic Avenue (looking north), would be retained with minimal change.

REUSE OF EXISTING BUILDING

Under Alternative D, the existing office building's north-facing entry, the northerly extension of the east wing, and the exposed concrete piers over the garage would be demolished, and the continuous full-height, slightly recessed curtain wall glazing and the glass curtain wall system would be replaced in kind for office use, rather than altered for residential use (see Figure 6.8, p. 6.102). The existing office building's auditorium space would be retained. A portion of the building's parking garage would be retained; however, the circular garage ramp structures would be demolished.

As with the proposed project and project variant, the existing office building's 13-foot-tall mechanical equipment room would be removed to accommodate a vertical addition. Alternative D's stepped, two-story, 24-foot-tall vertical addition would increase the height of the existing office building from 55 feet 6 inches up to 80 feet. The first story of the vertical addition would be set back 15 feet from the east, west, and south sides of the existing office building. The second story would be set back an additional 45 feet and 120 feet, respectively, from the east and west sides of the new floor addition immediately below. The addition would be designed with modern materials, such as steel and glazing, and would be visually subordinate to the existing structure matching its stepped approach.

With the addition of two floors to the existing office building and the enclosure of the northeastern portion of the existing office building (where the northerly extension of the east wing, exposed concrete piers over the garage, and circular garage ramp structures would be demolished), there would be a total 402,404 gross square feet of office space under Alternative D (26,404 more gross square feet than under existing conditions [with demolition of the existing 14,000-gross-square-foot annex building]), 352,405 more gross square feet than under the proposed project and 402,404 more gross square feet than under the project variant) (see Table 6.1, pp. 6.13-6.15).

NEW CONSTRUCTION

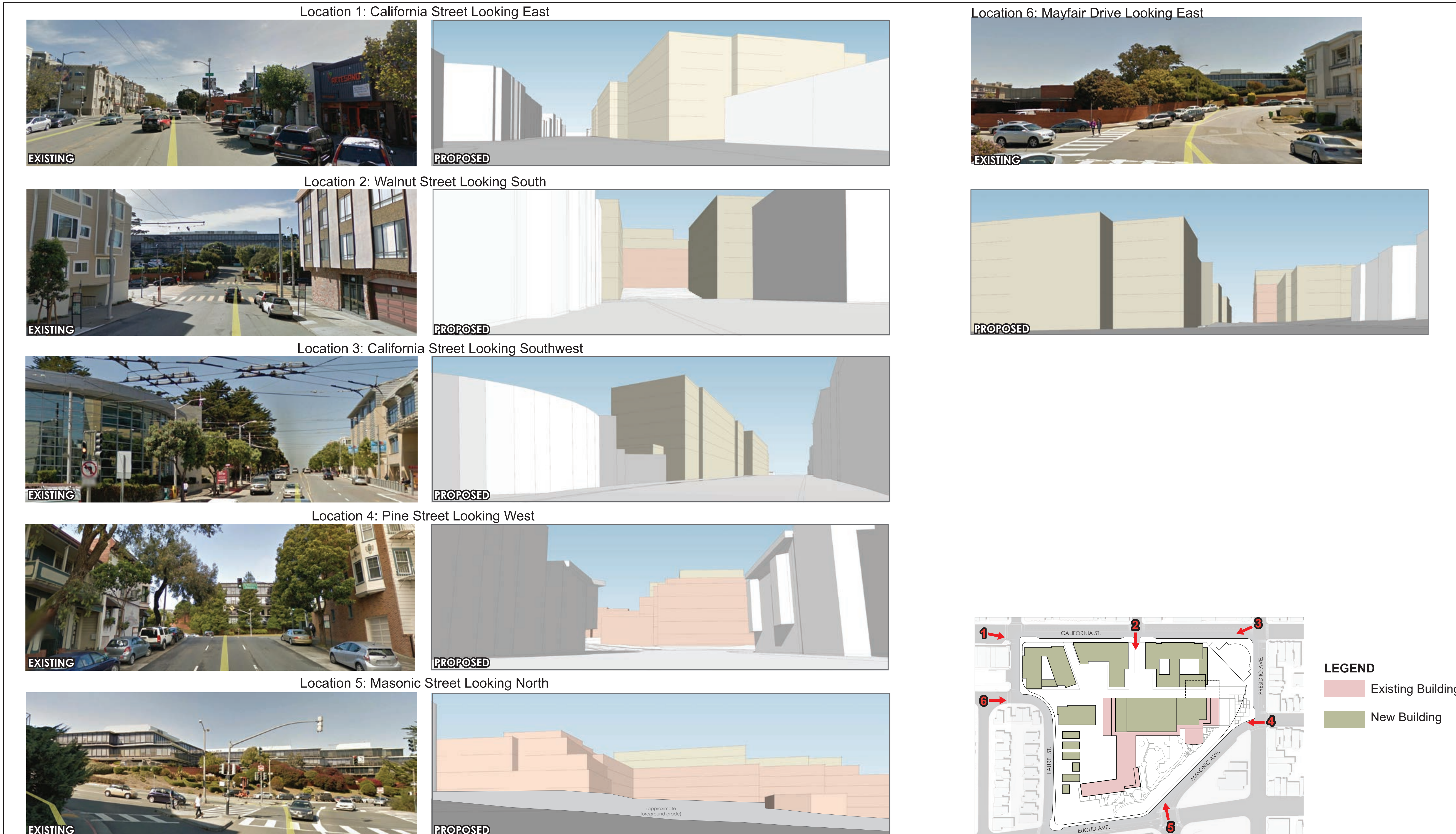
The footprints of the Plaza A, Plaza B, and Walnut buildings on California Street and the Mayfair Building on Laurel Street (including the California Street and Mayfair garages) would not change compared to the proposed project and project variant. The Plaza A and Plaza B buildings would be 65 feet tall, with ground floor retail (20 feet taller than the proposed project and project variant). As with the project variant, the Walnut Building would be 67 feet tall and would include ground floor retail and daycare space. The Mayfair Building would be a four-story residential building with a proposed height of 40 feet. Six Laurel Duplexes (not seven as with the proposed project and project variant) would be constructed along Laurel Street. Five would be set back 25 feet from Laurel Street, a similar setback as that for the proposed project or project variant. The fourth duplex in the row would be set back 60 feet from Laurel Street to retain two existing Coast Live Oak trees, as with the proposed project or project variant. The footprints would disturb slightly less surface area than under the proposed project or project variant because there would be one less building, and the last duplex on the south end would have a slightly smaller footprint in order to retain the south wing of the existing office building and a portion of the green lawn at the northeast corner of Euclid Avenue and Laurel Street. Each duplex would be four stories tall and building heights would range from 37 to 40 feet, as with the proposed project or project variant. (See Figure 6.9: Alternative D: Partial Preservation - Office Alternative Building Massing, for building massing on the project site from different locations around the site.)

SITE ACCESS AND PARKING

PARKING AND CIRCULATION

Alternative D would provide two new below-grade parking garages and five individual two-car parking garages, and would partially retain the three-level, partially below-grade parking garage as with the proposed project and project variant. The parking program for Alternative D would replace and expand the existing 543 surface and subsurface parking spaces on the project site. Overall, there would be a total of 1,132 off-street parking spaces: 456 spaces for residential uses, 69 spaces for retail uses, 570 spaces for office uses, 21 spaces for the daycare use, and 16 car-share spaces. Thus, Alternative D would provide 237 more parking spaces than the proposed project and 161 more spaces than the project variant. There would be 30 off-street residential parking spaces for the Mayfair Building; 10 spaces for the Laurel Duplexes would be in private, two-car parking garages. Off-street parking spaces for the remaining residential use (416 spaces) would be provided in the California Street Garage. All 69 off-street parking spaces for the retail use and all 21 spaces associated with the daycare use would also be located in the California Street Garage along with 16 car-share spaces. The 570 off-street parking spaces for the office use would be located in the California Street Garage (506 spaces) and the retained parking garage under the existing office building (64 spaces).

The primary differences between Alternative D and the proposed project or project variant in terms of parking and site circulation are one less curb cut on Masonic Avenue between Euclid and Presidio avenues and one less curb cut on Laurel Street south of Mayfair Drive.



Source: Laurel Heights Partners, LLC (2018)

FIGURE 6.9: ALTERNATIVE D: PARTIAL PRESERVATION - OFFICE ALTERNATIVE BUILDING MASSING

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Under Alternative D, there would be one less entry/exit driveway onto Masonic Avenue and one less driveway along Laurel Street for the Laurel Duplexes than the proposed project/project variant.[21] The renovated below-grade parking levels under the existing office building would connect to Basement Levels B1 and B3 of the California Street Garage via the eastern entry-exit off the Walnut Street extension for Basement Level B1, the access driveway from Presidio Avenue, and an internal garage ramp for Basement Level B3. (See Figure 6.10: Alternative D: Partial Preservation – Office Alternative Site Access for site and garage access points and the footprint of the retained and new parking garages.)

As with the proposed project or project variant, Alternative D would reduce the number of on-street parking spaces due to new curb cuts and the conversion of on-street parking to commercial and/or passenger loading zones. Overall, there would be a net reduction of 23 on-street parking spaces (versus 36 in the proposed project or project variant). Emergency vehicles would continue to have access to the perimeter of the project site; they would access the center of the site through the Walnut Street extension and the west end of Mayfair Walk.

PEDESTRIAN CIRCULATION

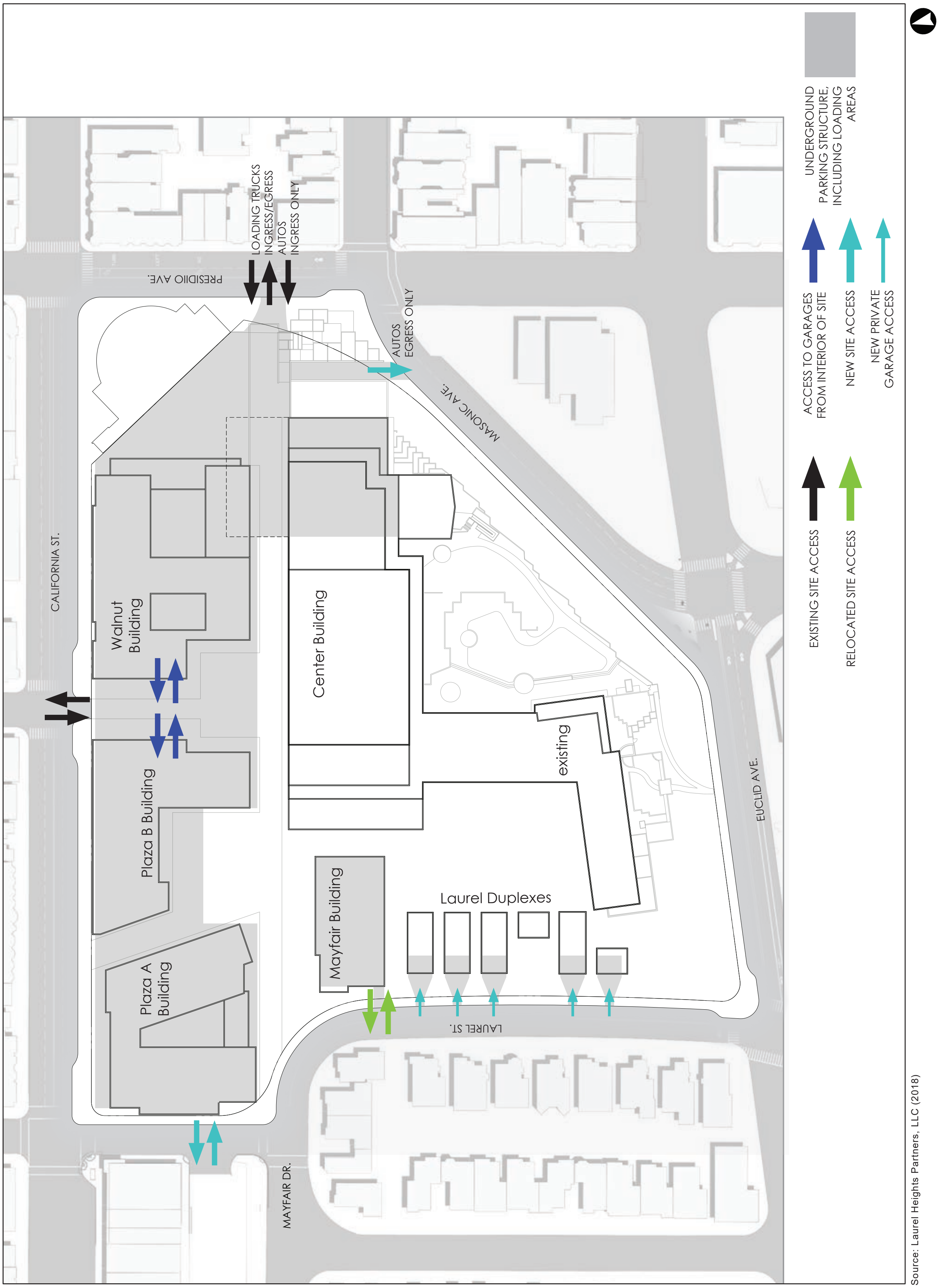
Under Alternative D, the project site would not be fully integrated with the existing street grid. Walnut Walk and Corner Plaza at Masonic and Euclid avenues would not be constructed. Mayfair Walk would be constructed between Mayfair Drive and Presidio Avenue. Thus, unlike the proposed project or project variant, pedestrians would not be able to walk through the site to Masonic and Euclid avenues. Public access to the green lawn at the corner of Laurel Street and Euclid Avenue would be provided, as with the proposed project and project variant.

FREIGHT AND PASSENGER LOADING PROGRAM

Under Alternative D, three (not six) off-street commercial and residential freight loading spaces would be developed in the off-street freight loading area in the California Street Garage, accessed from Presidio Avenue. Unlike the proposed project or project variant, there would be no second off-street loading dock.

Commercial Freight Loading: Commercial freight loading in the California Street Garage would serve all future retail and office tenants via service corridors, elevators, and internal stairs. Under Alternative D, ten (not five, as with the proposed project and project variant) on-street parking spaces on the south side of California Street near Laurel Street would be requested to be converted to create one on-street 180-foot-long (not 100-foot-long, as with the proposed project and project variant) commercial loading zone.

[21] The fourth Laurel Duplex would not include a private garage or driveway. Two parking spaces would be provided in the California Street Garage.



Source: Laurel Heights Partners, LLC (2018)

3333 CALIFORNIA STREET MIXED-USE PROJECT

2015-014028ENV

FIGURE 6.10: ALTERNATIVE D: PARTIAL PRESERVATION - OFFICE ALTERNATIVE SITE ACCESS

Passenger Loading: Seven (not ten, as with the proposed project and project variant) on-street parking spaces would be converted into two (not three) separate 60-foot-long passenger loading zones. Similar to the proposed project and project variant, under Alternative D passenger loading would also occur at the roundabout at the terminus of the Walnut Street extension into the project site, and daycare center pick-up/drop-off activities would occur at Basement Level B3 of the California Street Garage at a location adjacent to the elevator lobby for the daycare center space.

Thus, 16 on-street parking spaces would be converted to commercial freight and passenger loading zones (not 15 spaces as with the proposed project or project variant).

Residential Move-In and Move-Out Loading: As with the proposed project or project variant, residential move-in and move-out loading activities for the new buildings would occur in the off-street freight loading area in the California Street Garage or from existing on-street spaces along California and Laurel streets with a special time-limited permit from the SFMTA for use of existing on-street parking spaces.

Trash/Waste Pick-Up: Solid waste compaction, staging, and pickup would be the same as for the proposed project or project variant, and would occur adjacent to the off-street freight loading dock in the California Street Garage and from the Laurel Street curb for the Laurel Street Duplexes and Mayfair Building.

STREETSCAPE CHANGES

Under Alternative D streetscape changes would include the same sidewalk widening, corner bulb-outs, and most other features in the proposed project or project variant, including those at the intersection of Masonic and Presidio avenues (see Table 6.1, pp. 6.13-6.15). (See Chapter 2, Project Description, Figure 2.28a: Existing Streetscape and Proposed Streetscape Changes - Presidio Avenue, p. 2.81, for an illustration of the proposed change at the Masonic Avenue/Presidio Avenue/Pine Street intersection.) Unlike the proposed project and project variant, the streetscape changes at the intersection of Masonic and Euclid avenues would not be implemented and the westbound slip lane would not be eliminated. Site development under Alternative D would comply with the Urban Forestry Ordinance similar to the proposed project or project variant; and the removal of significant trees would require application and approval of a permit from public works.

CONSTRUCTION

Alternative D would be constructed in approximately 5.5 years in three phases. Construction activities included in the phases are listed below; and, as with the proposed project or project variant, the construction phases could be developed in a different order.

- First phase: Demolition of the circular garage ramp structures and the northerly extension of the east wing of the existing office building and alterations to the existing office building.
- Second construction phase: Demolition of the existing annex building and the surface parking lots on the north portion of the site and excavation and site preparation for construction of the California Street buildings and associated California Street Garage.
- Third phase: Demolition of the surface parking lot and associated landscaping on the west portion of the site near Laurel Street and excavation and site preparation for construction of the Mayfair Building (and associated Mayfair Garage) and the Laurel Duplexes.

As with the proposed project or project variant, excavation under Alternative D would extend to a depth of approximately 40 feet below ground surface and would encounter bedrock (including naturally occurring asbestos). Site disturbance would occur in an area with known soil and groundwater contamination from historic uses. Thus, site redevelopment would be conducted pursuant to a required site mitigation plan.

ABILITY TO MEET PROJECT OBJECTIVES

Alternative D would meet most of the basic project objectives, although in most cases to a lesser degree than would the proposed project or project variant. Alternative D would redevelop a large underutilized commercial site to a lesser degree than the proposed project or project variant, but with a similar mix of uses, improving and encouraging walkability and convenience (Objectives 1 and 2). This alternative would increase the City’s housing supply (Objective 3) with 456 residential units, but to a lesser extent than the proposed project or project variant, with 102 fewer units than the proposed project and 288 fewer units than the project variant. Alternative D would open and connect the site to the surrounding community by extending the neighborhood urban pattern and surrounding street grid into the site through a series of pedestrian pathways and open spaces, but to a lesser degree, as only Mayfair Walk, and not Walnut Walk, would be developed to extend through the entire site (Objective 4). Alternative D would provide a similar level of active ground floor retail uses, but fewer activated neighborhood-friendly spaces along the adjacent streets, and therefore would achieve Objective 5 to a lesser degree than the proposed project or project variant. Alternative D would provide a high quality and varied architectural and landscape design, utilizing the site's topography and other unique characteristics (Objective 6). Alternative D would construct some open spaces such as the plazas and Mayfair Walk that would be usable to project residents and surrounding community members, but not as many as the proposed project or project variant, and would therefore achieve Objective 7 to a lesser degree than the proposed project or project variant. Alternative D would partially meet Objective 8 by providing code-required open space; however, open space would not be as varied or designed to maximize pedestrian accessibility. Alternative D would include sufficient off-street parking to meet the project’s needs (Objective 9), and it would retain and integrate the existing office building into the development (Objective 10).

IMPACTS OF ALTERNATIVE D: PARTIAL PRESERVATION – OFFICE ALTERNATIVE

CULTURAL RESOURCES (HISTORIC ARCHITECTURAL RESOURCES)

Approach

The historic preservation approach for Alternative D focused on continuing the historic office use and retaining the majority of the character-defining features of the building, but only some of the character-defining features of the site and landscape that contribute to the Midcentury Modern-designed corporate campus property. (See summary below for the disposition of the character-defining features under Alternative D, and Figure 6.8 and Figure 6.9, p. 6.102 and 6.105). Under Alternative D most of the existing office building would be retained; however, site and landscape features would only be partially retained.

Retention of Character-Defining Features

The disposition of the site and landscape features under Alternative D is as follows:

Character-Defining Features	Level of Retention (Alternative D)
Existing Office Building	**Retained**
Stepped multi-story massing built into the natural topography of the site	Retained
Office building encompassing three distinct building phases that have all taken on significance	Mostly retained, partial demolition of east wing
Midcentury Modern architectural style with little ornamentation	Retained
Flat, cantilevered roof with projecting eaves	Retained
Continuous full-height, slightly recessed curtain wall glazing on most sides and along all levels of the building	Replaced in-kind for continued office use
Glass curtain wall composed of bronze powder-coated aluminum framing system in a regularly spaced pattern of mullions and muntins, typically with a small spandrel panel of obscure glass below a larger pane	Replaced in-kind for continued office use
Site and Landscape	**Partially Retained**
Corporate campus setting featuring an office building located on a large, open landscaped site across 10.25 acres	Partially retained, development limited to 10 new buildings on the surface parking lots and open areas on the northern and western portions of site

(continued)

Character-Defining Features	Level of Retention (Alternative D)
Landscape utilizing curvilinear shapes in pathways, driveways, and planting areas; and other integrated landscape features (planter boxes, seating)	Partially retained
– *elements on northern and western portions of the project site*	– *Demolished*
– *open space/sloped lawn on Laurel Street*	– *Demolished*
– *open space/lawn at Presidio and Masonic avenues*	– *Demolished*
– *elements of the private courtyard/landscaped areas on south and east sides of the existing office building*	– *Retained*
Main entrance leading from Walnut and California streets	Retained
Brick perimeter walls, integrated planter boxes, and retaining walls of reinforced concrete and clad in stretcher bond pattern	Partially retained
– *Perimeter brick wall and integrated planter boxes that border north and west (partial) boundaries of site*	– *Demolished portions along California and Laurel streets*
– *Brick retaining walls and integrated planter boxes in the private courtyard/landscaped areas on south and east sides of existing office building*	– *Retained*
Mature trees around the corporate modern campus	Mostly retained, with removal of some mature trees along northern and western portions of site
Open area along Euclid Avenue and Laurel Street	Retained
Concrete pergola atop terraced planting facing Laurel Street	Retained

Under Alternative D fewer changes would be made to the existing office building than would occur with the proposed project or project variant. Changes to the existing office building would include demolition of the north-facing entry on its north façade, the northerly extension of the east wing, the exposed concrete piers along with the circular garage ramp structures, a portion of the existing garage, and the rooftop mechanical penthouse; the in-kind replacement of the glass curtain wall system for continued office use; construction of a vertical addition; and additional structural support to accommodate the increased load from the two-story addition.

The limited demolition on the building's east wing and north façade would slightly alter the building's historic footprint, and the office use would be continued and expanded with a vertical addition. The stepped, two-story vertical addition (approximately 24 feet) would not be as tall as the vertical addition (two to three stories) under the proposed project or project variant. On its first story, the addition would be set back 15 feet from the east, west, and south sides of the existing office; at the second story, it would be set back an additional 45 feet and 120 feet from the east and west sides, respectively. As such, the rooftop addition would be spatially differentiated from the historic façade to preserve the horizontal massing and scale of the building. The new rooftop addition would be constructed of modern materials, such as steel and glazing, and would have a contemporary design, which would distinguish it from the original building. Overall, the vertical addition would increase the height of the existing office building;

however, when viewed from the street level (looking north and west to the project site from Euclid Avenue, Masonic Avenue, Presidio Avenue, or Pine Street) the vertical addition would appear visually subordinate to the historic portion of the office building. Additionally, the demolition of a small portion of the building and the minor change to its footprint would not result in a substantial change to the essential form and integrity of the building. Likewise, the differentiated yet compatible modern design of the rooftop addition, in tandem with its setbacks, would not result in a substantial change to the building's massing.

Alternative D would include the construction of ten new buildings, two new below-grade parking garages, and five individual two-car parking garages on the northern and western portions of the project site. The new buildings would be located along California and Laurel streets, and, with the exception of the former location of the annex building, would be located in areas that comprise a portion of the project site's open space, primarily landscaped pathways, driveways, and planting areas; grass lawns; groves of trees; and the pergola and the terraced landscape bordering the surface parking lot along Laurel Street. With development focused on the northern and western portions of the property, including demolition of the annex building, the removal of many of the project site's character-defining site and landscape features including some of the mature trees would be necessary.

Summary of Ability to Meet Secretary of Interior's Standards for Rehabilitation

As described above, Alternative D would retain most of the existing office building's character-defining features but not most of the character-defining features of the site and landscape. The relevant rehabilitation standards are discussed below with a short explanation regarding the alternative's ability to meet the standard.

Rehabilitation Standard 1 states that the "property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces and spatial relationships." As described above, under Alternative D the historic office use would be continued and changes to the building would be minimal; however, new buildings with residential and retail uses would be introduced on the northern and western portions of the site along California and Laurel streets resulting in changes to the site's open areas that create the corporate campus environment including the surface parking lots, grass lawns, and internal circulation network. These changes, and the resultant effect on the distinctive materials, features, spaces, and spatial relationships of the building, site, and landscape features, would be beyond the minimal changes acceptable under Standard 1. Thus, when considered together, the changes to the building, site and landscape features, although limited to the northern and western portions of the 10.25-acre site, would not fully conform with Standard 1.

Rehabilitation Standard 2 states that the "historic character of a property shall be retained and preserved," and "removal of historic materials or alteration of features and spaces that characterize a property shall be avoided." Rehabilitation Standard 5 states that "distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a historic property shall be preserved." Under Alternative D the modifications to the existing building including minor changes to the building's historic footprint, as described above, would not be substantial. The majority of the existing office building's character-defining features, including the stepped multi-story massing built into the natural topography of the site; the multi-wing footprint; the Midcentury Modern architectural style with little ornamentation; and the flat cantilevered roof with projecting eaves would be retained; and the glass curtain wall system would be replaced in-kind. However, new infill construction would result in the demolition/removal of most of the curvilinear shapes in pathways, driveways, and planting areas; integrated landscape features such as planter boxes and seating; brick perimeter walls; and the concrete pergola atop a terraced open area facing Laurel Street as well as the removal of mature trees. Thus, when considered together the changes to the building, site and landscape features, although limited to the northern and western portions of the 10.25-acre site, would not fully conform with Standards 2 and 5.

Rehabilitation Standard 9 states that "new additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property," and "new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property." Under Alternative D, as described above, the size, scale, materials, and design of the exterior alterations including the new rooftop addition would distinguish it from the original building yet be compatible with Midcentury Modern design principles. Demolition would be limited such that the change to the building's footprint would not substantially alter the building's general form or massing. However, as stated above, new infill construction would demolish/remove most of the curvilinear shapes and hardscape features of the site and landscape on the northern and western portions of the property. Thus, when considered together the changes to the building, site and landscape features, although limited to the northern and western portions of the 10.25-acre site, would not fully conform with Standard 9.

Rehabilitation Standard 10 states that "new additions and adjacent or related new construction shall be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired." Under Alternative D, the demolition of a small portion of the building and the rooftop addition would not represent irreversible changes to the essential form and integrity of the building. However, when considered together with new construction, which would remove most of the character-defining features of the site and landscape, the essential form and integrity of the Midcentury Modern designed corporate campus and its environment would not be able to be restored to its previous state even if new buildings and the rooftop addition were to be removed in the future. Therefore, Alternative D would not fully conform with Standard 10.

Conclusion

New construction (seven new buildings along Laurel Street and three along California Street) would obscure existing views from Laurel Street (looking east) of retained character-defining features of the site and building. The southern and eastern portions of the site, including the unimproved grass lawn extending east from Laurel Street and Euclid Avenue to Masonic Avenue and the private courtyards, landscaping, and trees, would be retained in their existing conditions. Thus, the most prominent view of the property, from the east on Pine Street (looking west) and from the south on Masonic Avenue (looking north), would be retained with minimal change. The view through the project site to the existing building from Laurel Street (looking west) would be altered with new development.

New construction and changes to the existing office building would result in moderate changes to the distinctive materials, features, spaces and spatial relationships on the northern and western portions of the property. Although the retention, rehabilitation, and reuse of the existing office building under Alternative D would avoid the physical loss of the office building, the removal of many of the character-defining site and landscape features in combination with the construction of ten new buildings along California and Laurel streets would be substantial enough to hinder the site's ability to convey its historically open feel such that the property could no longer convey its historic and architectural significance as a Midcentury Modern-designed corporate campus.

Although Alternative D would reduce the impact on the historic architectural resource, the extent of the alterations to the character-defining building, site, and landscape features would, on balance, materially alter the physical characteristics of the property at 3333 California Street that convey its historic and architectural significance and that justify its inclusion in the California Register. As such, Alternative D would reduce the magnitude of the impact compared to the proposed project and project variant, but not to a less-than-significant level, and the substantial adverse impact on the historic resource at 3333 California Street would remain. For this reason, as with the proposed project or project variant, implementation of Mitigation Measure M CR-1a: Documentation of Historical Resource and Mitigation Measure M-CR-1b: Interpretation of the Historical Resource (see pp. 4.B.45-4.B.46) would be required for Alternative D. Implementation of these mitigation measures would reduce the significant impact of Alternative D, but not to a less-than-significant level.

<u>Off-Site Historic Resources</u>: For the same reasons as the proposed project and project variant, Alternative D would have a less-than-significant impact on off-site historic architectural resources.

<u>Cumulative Impacts</u>: For the same reasons as the proposed project and project variant, Alternative D in combination with other cumulative development in the vicinity would not result in a significant cumulative impact on historic architectural resources.

TRANSPORTATION AND CIRCULATION

Trip Generation

The travel demand for Alternative D was estimated for weekday daily and weekday a.m. and p.m. peak hours and presented in Table 6.2**,** p. 6.16. As shown in Table 6.2**,** Alternative D would generate 2,018 external person-trips during the weekday a.m. peak period: 1,216 auto person-trips, 368 transit trips, 377 walk trips, and 57 trips by other modes. During the weekday p.m. peak period, Alternative D would generate 2,165 external person-trips: 1,307 auto person-trips, 403 transit trips, 392 walk trips, and 64 trips by other modes. A summary of the differences in external vehicle trips generated under Alternative D compared to the proposed project and project variant is shown in Table 6.9: Alternative D Vehicle-Trip Generation Comparison– External Trips.

Table 6.9: Alternative D Vehicle-Trip Generation Comparison– External Trips

	Daily NOTE A	**Weekday AM Peak Hour**	**Weekday PM Peak Hour**
Alternative D	6,368	736	791
Proposed Project	5,760	691	752
Difference NOTE B	+608 or 10.5% increase	+45 or 6.5% increase	+39 or 5.2% increase
Alternative D	6,368	736	791
Project Variant	5,744	726	804
Difference NOTE B	+624 or 10.9% increase	+10 or 1.4% increase	-13 or 1.6% reduction

Notes:
[A] The weekday AM peak hour internal trip rate was applied to the daily person-trips to estimate the number of external vehicle trips.
[B] Total reflects external vehicle trips.

Source: *SF Guidelines*, 2002; Kittelson & Associates, Inc, 2018; *3333 California Travel Demand Memo*, March 2018

Construction Transportation

Unlike the proposed project and project variant, Alternative D would be constructed in three phases over 5.5 years. Because of its reduced construction program and shorter duration of construction activities compared to the proposed project and project variant, Alternative D would result in fewer and less substantial construction transportation effects. Therefore, as with the proposed project or project variant, Alternative D would result in a less-than-significant construction-related transportation impact, and Improvement Measure I-TR-1: Project Construction Updates, p. 4.C.74, could be implemented to further reduce the less-than-significant impact.

Operational Transportation Impacts

Based on the information in Table 6.9, compared to the proposed project and project variant, Alternative D would result in an approximately 1 to 7 percent increase in vehicle trips during the weekday a.m. peak hour and an approximately 2 percent decrease and 5 percent increase in vehicle trips during the weekday p.m. peak hour. The increase in vehicle trip generation would primarily result from the increase in office square footage relative to the proposed project and project variant. Under Alternative D, the office use would generate 195 vehicle trips during the weekday a.m. peak hour and 204 vehicle trips during the weekday p.m. peak hour, or 171 and 170 more vehicle trips than the proposed project during the weekday a.m. and p.m. peak hours, respectively. The project variant would not include office space. As a result, Alternative D would result in slightly different operational effects than those described for the proposed project and project variant.

VMT Impacts

The average daily vehicle miles traveled (VMT) per capita by use for Alternative D would be the same as under the proposed project and project variant. The existing average daily VMT within TAZ 709 per capita for residential uses, or per employee for retail and office uses, are more than 15 percent below the existing and future regional averages for the project site's location. The analysis also compares the provision of parking for Alternative D residential, retail, and other non-residential (office and daycare) uses to the neighborhood parking rates for each use, using the same methodology as for the proposed project, project variant, and all other alternatives, as summarized for Alternative B on p. 6.44. The residential parking rate accounts for residential units in the transportation analysis zone (TAZ) 709 and other nearby TAZs (within three-quarters of a mile based on walking distance) with more distant land use and parking given decreasing weight. The retail and other non-residential parking rates account for parking associated with retail and other non-residential uses along California and Sacramento streets near the project site. This information is presented in Table 6.10: Parking Rate Summary for Alternative D.

As shown in Table 6.10, Alternative D would provide parking for residential uses at the same rate as under the proposed project and project variant. Alternative D would provide 69 parking spaces (1.56 spaces per 1,000 square feet) for the retail uses and 591 spaces (1.42 spaces per 1,000 square feet) for the other non-residential (office and daycare) uses. Although the total amount of off-street parking would increase with Alternative D compared to the proposed project and project variant, Alternative D would provide retail and other non-residential parking at the existing neighborhood rates for those uses, a lower rate than the proposed project and project variant. Thus, unlike the proposed project or project variant, under Alternative D the VMT impact would be less than significant and would not require mitigation. Therefore, Mitigation Measure M-TR-2: Reduce Retail Parking Supply, p. 4.C.80, would not apply to Alternative D.

Table 6.10: Parking Rate Summary for Alternative D

Scenario / Land Use	Size	Vehicle Parking Spaces	Existing Neighborhood Parking Rate	Proposed Parking Rate	Change from Existing
Alternative D					
Residential	456 units	456	0.90	1.00	11%
Retail	44,306 gross square feet	69	1.55	1.56	0.5%
Other Non-residential	417,054 gross square feet	591	1.44	1.42	-1.4%
Proposed Project					
Residential	558 units	558	0.90	1.00	11%
Retail	54,117 gross square feet	198	1.55	3.66	136%
Other Non-residential	64,689 gross square feet	129	1.44	1.99	38%
Project Variant					
Residential	744 units	744	0.90	1.00	11%
Retail	48,593 gross square feet	188	1.55	3.87	150%
Other Non-residential	14,650 gross square feet	29	1.44	1.98	37%

Notes: The existing parking rate for residential uses reflects data for TAZ 709. The existing parking rate for retail and other non-residential uses reflects data from California and Sacramento streets, as provided by the planning department. The retail land use category for the proposed project and project variant includes the proposed 60 public parking (commercial) spaces on the project site. Car-share spaces are not included in the parking rate calculation.

Neighborhood Parking Rates:

Residential Parking Rate = 0.9 space/unit (neighborhood)
Retail Rate = 1.55/ 1,000 square feet (California and Sacramento)
Other Non-Residential Rate = 1.44/ 1,000 square feet (existing site)

Source: Kittelson and Associates, Inc. 2018; San Francisco Planning Department, 2018.

Traffic Hazard Impacts

Alternative D would result in about 5 percent more vehicle trips in the weekday p.m. peak hour than the proposed project, and approximately 2 percent fewer than the project variant. There would be two fewer curb cuts. In all other respects the vehicle trips and circulation changes under Alternative D would be similar to those for the proposed project or project variant. Therefore, Alternative D would result in operational effects similar to those of the proposed project or project variant (see Impact TR-3, pp. 4.C.81-4.C.83, and traffic hazard impacts under Alternative D would remain less than significant. Implementation of Improvement Measure I TR-3: Queue Abatement, p. 4.C.82 would further reduce the less-than-significant traffic hazard impacts.

Transit Impacts

As shown in Table 6.2, p. 6.16, during the weekday a.m. and p.m. peak periods Alternative D would generate approximately 25 percent and 22 percent more transit trips than the proposed project, respectively, and approximately 14 percent and 3 percent more transit trips than the project variant, respectively, primarily due to the increase in office uses.

Alternative D would add 18 riders to the 43 Masonic bus route and, as with the proposed project and project variant, would result in adverse impacts on the 43 Masonic by increasing ridership to exceed the 85 percent capacity utilization during the weekday a.m. peak hour under baseline conditions. Therefore, Alternative D would have a significant impact on an individual Muni line and mitigation would be required. Implementation of Mitigation Measure M-TR-4: Monitor and Provide Fair Share Contribution to Improve 43 Masonic Capacity, pp. 4.C.87-4.C.88, would reduce the impact to less-than-significant levels. Under Alternative D a fair share contribution of $272,635[22] would be conveyed to the SFMTA when monitoring, funded by the project sponsor beginning upon completion and occupancy of the first development phase, shows that capacity utilization has exceeded 85 percent. Similar to the proposed project or project variant, the SFMTA's ability to provide additional capacity or improve transit headways is uncertain; thus, the impact would remain significant and unavoidable after mitigation.

While the number of peak hour transit trips on regional carriers would be higher for Alternative D compared to the proposed project and project variant, there would still be sufficient capacity on regional lines to accommodate the increase in regional transit trips. Therefore, Alternative D would have a less-than-significant impact on regional transit routes.

Pedestrian Impacts

Under Alternative D, pedestrians would be able to walk onto the project site from California and Walnut streets, Mayfair Drive, and Presidio Avenue/Masonic Avenue/Pine Street. However, unlike the proposed project and project variant, without the southern half of the north-south Walnut Walk, the project site would not be fully integrated with the existing street grid. Based on the information in Table 6.2, p. 6.16, Alternative D would generate about 745 pedestrian trips (368 walk trips and 377 transit trips) in the a.m. peak hour and 745 (403 walk trips and 392 transit trips) in the p.m. peak hour. This would be an increase of approximately 2 to 11 percent more pedestrian trips than the proposed project or project variant because there would be substantially more office space and fewer residential units. The incremental increase in pedestrian trips would not be substantial and would not result in overcrowding on public sidewalks.

Alternative D would generate about 7 percent more vehicle trips than the proposed project and project variant in the weekday a.m. peak hour; however, the increase would not be substantial enough to alter traffic operations such that potentially hazardous conditions for pedestrians would occur. There would be one less curb cut than in the proposed project or project variant. The same sidewalk widening, corner bulbouts, and most other streetscape features included in the proposed project or project variant would be constructed in Alternative D, with the exception of the streetscape improvements at the intersection of Masonic and Euclid avenues. Curb cuts and

[22] See EIR Appendix G: Alternatives Analysis – Transportation and Circulation, Attachment A, Transit Capacity Analysis and Fair Share Contribution Calculations, p. 104.

project driveways as well as the streetscape changes would not create hazardous conditions or accessibility impacts for pedestrians. In summary, pedestrian impacts under Alternative D would remain less than significant. Similarly, implementation of Improvement Measure I-TR-3: Driveway Queue Abatement, p. 4.C.82, would further reduce the less-than-significant pedestrian impacts.

Bicycle Impacts

Under Alternative D the number of driveway conflict points would be reduced in comparison to the proposed project and project variant. The Walnut Walk would not be constructed connecting California Street to Euclid and Masonic avenues. Thus, compared to the proposed project or project variant, under Alternative D, as with the full preservation alternatives, bicycle accessibility to and through the site would be more limited.

Alternative D would generate slightly more vehicle trips in the a.m. peak hour than the proposed project and project variant. However, the proposed streetscape and site changes combined with the incremental increase in vehicle trips would not create hazardous conditions or interfere with bicycle accessibility. Thus, impacts would remain less than significant. Similarly, implementation of Improvement Measure I-TR-3: Driveway Queue Abatement, p. 4.C.82, would further reduce the less-than-significant bicycle impacts.

Loading Impacts

FREIGHT LOADING

Alternative D would generate an average and peak hour demand of seven and nine freight loading spaces, respectively, two and three more than the proposed project and project variant. Under Alternative D, three (not six) off-street freight loading spaces would be developed. The project sponsor request for the conversion of five on-street parking spaces to one 100-foot-long on-street commercial loading zone on California Street would be expanded to request the conversion of nine spaces for a 180-foot-long on-street commercial loading zone under Alternative D. The on-street commercial loading zone could accommodate up to six delivery vans or single-unit trucks (e.g., FedEx, Amazon Fresh) which are typically about 30 feet in length. Combined there would be nine loading spaces, satisfying the peak hour loading demand. However, given the topography (i.e., an approximately 65-foot elevation change from southwest to northeast) and size of the site (10.25 acres), it is possible that delivery vehicles would concentrate near the uses they are attempting to serve, resulting in an uneven distribution of demand. Delivery vehicles associated with the retail uses may choose to use the loading zone on California Street instead of loading spaces in the California Street Garage, while the off-street loading dock would likely be used for deliveries to the office building.

A localized loading demand analysis was conducted to estimate the freight loading demand associated with the on-street and off-street loading spaces. Based on these calculations, the on-street loading zone would meet the peak hour demand of three spaces associated with the retail and residential uses, and would likely have extra loading space available at all times. The off-street loading dock could have a peak hour demand for six loading spaces associated with the office, some of the residential, and the daycare uses based on the locations of these uses. Thus, while the overall demand for nine freight loading spaces in the peak loading hour would be met by the six on-street spaces and three off-street spaces, the proposed supply would fall short of peak hour demand in terms of the location of the proposed loading spaces. Therefore, like the proposed project or project variant, the improvement measures identified for the proposed project or project variant to further reduce their less-than-significant freight loading impacts would also be applicable to Alternative D. Thus, implementation of Improvement Measure I-TR-9a: Schedule and Coordinate Deliveries and Improvement Measure I-TR-9b: Monitor Loading Activity and Implement Loading Management Strategies as Needed (see pp. 4.C.97-4.C.98) would reduce the less-than-significant commercial freight loading impact. Implementation of these measures would coordinate deliveries such that loading activities would be distributed across the site, would limit deliveries to off-peak hours to reduce peak hour demand; and would require ongoing monitoring to allow for adaptive management such that loading activities do not introduce hazards or substantial delays to transit.

PASSENGER LOADING

Alternative D would generate 57 passenger drop-off/pick-up trips (34 drop-off, 23 pick-up) during the weekday a.m. peak period and 64 passenger drop-off/pick-up trips (28 drop-off, 36 pick-up) during the weekday p.m. peak period. This demand would be slightly greater than that for the proposed project or project variant and is equivalent to 80 linear feet (or 4 spaces) during the peak hour of demand. Unlike the proposed project or project variant, under Alternative D the project sponsor would seek the conversion of seven on-street parking spaces into two separate 60-foot-long passenger loading zones (each loading zone would accommodate up to three passenger vehicles). Passenger loading would also occur within Basement Level B3 of the California Street Garage (associated with the daycare use as with the proposed project or project variant) and at the roundabout at the terminus of the Walnut Street extension. Under Alternative D, as with the proposed project and project variant, the passenger loading supply would meet demand and the passenger loading impact would be less than significant.

Emergency Access Impacts

Under Alternative D emergency vehicles would continue to have access to the perimeter of the project site, and would have access to the center of the site via the Walnut Street extension and the west end of Mayfair Walk. As with the proposed project and project variant, emergency access impacts would be less than significant.

Cumulative Impacts

As with the proposed project and project variant, Alternative D, in combination with past, present and reasonably foreseeable development in the project vicinity, would result in a less-than-significant cumulative construction-related transportation impact and less-than-significant 2040 cumulative impacts related to traffic hazards, transit, pedestrians, bicycles, loading, and emergency access. Unlike the proposed project or project variant, the incremental effects of Alternative D on regional VMT would not be significant, when viewed in combination with past, present, and reasonably foreseeable future projects, and Alternative D would not contribute considerably to a cumulative VMT impact. Mitigation Measure Mitigation Measure M-TR-2: Reduce Retail Parking Supply would not be required for Alternative D.

NOISE AND VIBRATION

Compared to the proposed project and project variant, under Alternative D there would be a similar amount of demolition, construction, and ground disturbance on the northern portion of the project site along California Street and slightly less construction activity along Laurel Street. Unlike the proposed project or project variant, Alternative D would result in no change to existing conditions on the southern and eastern portions of the project site fronting Euclid Avenue, and Masonic and Presidio avenues (see Figure 6.10, p. 6.108, and Figure 2.22, p. 2.62).

Construction Noise

The construction program for Alternative D would be completed in 5.5 years (not 7 to 15 years as with the proposed project and project variant) and in three phases rather than four. However, the type of construction equipment and use characteristics would not change because demolition, excavation, and construction activities, even though more limited, would still occur. Thus, the potential to generate substantial temporary noise increases of at least 10 dBA over ambient levels at off-site locations along California Street, Euclid Avenue, and Laurel Street would remain (see Impact NO-1, pp. 4.D.36-4.D.46), and the noise impacts from these activities under Alternative D would also be significant and unavoidable. Overlapping construction phases would continue to result in the occupancy of a new and/or renovated building from a previous phase by future residents during later construction phases. For these reasons, implementation of Mitigation Measure M-NO-1: Construction Noise Control Measures (see pp. 4.D.42-4.D.43) would be required.

Although the construction noise reduction strategies identified under Mitigation Measure M-NO-1 would not reduce the construction noise impact at off-site and on-site sensitive receptor locations to a less-than-significant level, as with the proposed project and project variant, implementation of Mitigation Measure M-NO-1 would further reduce the less-than-significant noise impacts related to compliance with local standards for construction noise from non-impact equipment.

With a more limited construction program and shorter construction schedule, there would be less excavated material hauled off-site, less concrete used, and less material delivered to the site under Alternative D than the proposed project or project variant. Thus, construction-related noise attributable to construction truck traffic on local roadways would be reduced in comparison to the proposed project or project variant, and, like the proposed project or project variant, would be a less-than-significant impact.

Construction Vibration

Under Alternative D, as with the proposed project or project variant, construction activities that generate groundborne vibration would occur, e.g., the use of excavators and vibratory rollers, and the potential for structural damage to adjacent structures would remain. Thus, under Alternative D, as with the proposed project or project variant, construction-related groundborne vibration impacts on the adjacent SF Fire Credit Union building would also be significant and implementation of Mitigation Measure M-NO-2: Vibration Monitoring Program for SF Fire Credit Union Building (see pp. 4.D.53-4.D.56) would be required. With implementation of Mitigation Measure M-NO-2 the significant impact on the SF Fire Credit Union Building under Alternative D would be reduced to a less-than-significant level, as with the proposed project or project variant.

Operational Noise

Stationary Equipment

Under Alternative D, the emergency diesel generator that serves the existing office building would be relocated within the retained parking garage under the existing building and would not result in a significant noise impact. HVAC equipment for the Laurel Duplexes, and the Mayfair, Plaza A, Plaza B and Walnut buildings would be located on the rooftops. As with the proposed project or project variant, Mitigation Measure M-NO-3: Stationary Equipment Noise Controls (see p. 4.D.60) would still be required under Alternative D for rooftop equipment to ensure that proper enclosures or other sound muffling measures would be implemented to meet regulatory requirements established in the Noise Ordinance. Therefore, like the proposed project or project variant, with mitigation this impact would be reduced to a less-than-significant level.

Traffic

The mix of uses in Alternative D would be different than the mix in the proposed project or project variant. The expansion of the existing office use would represent an approximately 88 percent increase over the amount of office in the proposed project, and a 100 percent increase over the project variant that proposes no office space. New residential uses would be developed under Alternative D, but with 102 fewer units than under the proposed project and 288 fewer than the project variant. As shown in Table 6.9, p. 6.116, Alternative D would generate 608 more daily vehicle trips per weekday than the proposed project and 624 more than the project variant, an approximately 11 percent increase in traffic volumes over the proposed project and project variant. However, during the weekday p.m. peak period Alternative D would generate 39 more vehicle trips than the proposed project and 13 fewer vehicle trips than the project variant. Therefore, the traffic noise increase would be similar to, or slightly greater than, the reported traffic noise increase of 1 dBA or less attributable to the proposed project or project variant, and would be less than significant (see Impact NO-4, pp. 4.D.62-4.D.64).

Land Use Compatibility

Like the proposed project or project variant, Alternative D would result in the introduction of new residential land uses along California and Laurel streets, but fewer new residential buildings would be developed along the perimeter of the site. Alternative D would have less-than-significant noise compatibility impacts related to future noise levels similar to those identified for the proposed project or project variant (see Impact NO-5, pp. 4.D.64-4.D.67).

Cumulative Impacts

Construction-related cumulative noise and vibration impacts under Alternative D would be similar to those of the proposed project or project variant in combination with noise from construction of other nearby projects expected during the buildout period for the alternative, and would continue to be less than significant (see Impact C-NO-1, pp. 4.D.68-4.D.70). Under 2040 cumulative conditions with the proposed project or project variant, a traffic noise increase of 2 dBA or less was identified resulting in a less-than-significant cumulative noise impact (see Impact C-NO-2, pp. 4.D.71-4.D.72). Alternative D would result in an approximately 10 percent increase in traffic compared to the proposed project or project variant, and in combination with forecast cumulative traffic growth in 2040 would not result in an ambient noise increase of over 3dBA and therefore would not be noticeable to most people. Therefore, cumulative noise impacts with operation of Alternative D would continue to be less than significant.

AIR QUALITY

Under Alternative D, there would be less demolition, less construction, and less ground disturbance than under the proposed project or project variant. Along the northern and western portions of the project site, demolition, construction, and ground disturbance would be similar to that under the proposed project or project variant; however, the majority of the southern portion of the project site would be undisturbed. Construction of Alternative D would be completed in 5.5 years in three overlapping phases rather than four.

As with the proposed project or project variant, under Alternative D the emergency diesel generator and electrical substations, and the boilers, chillers and other equipment in the annex building would be removed as part of the demolition of the circular garage ramp structures and annex building. The emergency diesel generator would be replaced with a similarly-sized generator in a new location in the retained parking garage under the expanded office building. New HVAC equipment for the new buildings would be located on rooftops.

Criteria Air Pollutants

Construction

As described under Impact AQ-1, pp. 4.E.47-4.E.49, estimated construction-related emissions for criteria air pollutants for the proposed project or project variant would not exceed the applicable construction-related significance thresholds for reactive organic gases (ROG), nitrogen oxides (NOx), and particulate matter (PM). Under the more limited construction program of Alternative D, the total construction-related criteria air pollutant emissions would be averaged over a shorter period of time and would thus be slightly higher in comparison to the proposed project or project variant. This was determined by dividing the new gross square feet of construction for Alternative D (total gross square feet minus existing gross square feet) by the number of years of construction (5.5) and comparing this to the same ratio for the proposed project and project variant. This assumes construction emissions are directly proportional to new gross square footage. Using this method, it is expected that daily and annual emissions could be approximately 25 percent higher than the project or project variant. This increase would not be large enough for Alternative D emissions to exceed BAAQMD thresholds, and would continue to result in a less-than-significant air quality impact.

Operation

As described under Impact AQ-2, pp. 4.E.49-4.E.52, the air quality impacts associated with estimated operational emissions for criteria air pollutants for the proposed project or project variant would be substantially below the applicable significance thresholds for ROG, NOx, and PM (see Tables 4.E.8 and 4.E.9 on pp. 4.E.54 and 4.E.56). Because of the reduced land use program under Alternative D (e.g., three fewer buildings and no upsizing for the on-site emergency diesel generator) there would be fewer area, stationary, and building energy sources of emissions; however, there would be increased emissions from mobile sources. As shown in Table 6.9, p. 6.116, Alternative D would generate 608 more vehicle trips per weekday than the proposed project and 624 more vehicle trips per weekday than the project variant (an approximately 11 percent increase relative to the proposed project's or project variant's vehicle trips). Consequently, the average daily criteria air pollutant emissions attributable to mobile sources under Alternative D would increase by no more than 11 percent compared to those generated under the proposed project or project variant, since only a portion of the criteria air pollutant emissions are from traffic, and emissions from other sources (area, stationary, and building energy) are decreasing. With this limited increase in mobile source emissions and some reduction in area, stationary, and building energy emissions, operational criteria pollutant emissions would remain below applicable thresholds and the impact would continue to be less than significant.

Toxic Air Contaminants

Similar to the proposed project or project variant, construction and operation of Alternative D would generate toxic air contaminants, including diesel particulate matter. As noted above, Alternative D would result in a reduction in the total gross square feet of floor area from that for the proposed project or project variant. Thus, Alternative D would generate less total construction-related, $PM_{2.5}$ and diesel particulate matter emissions than under the proposed project or project variant. Under Alternative D, a new, but similarly sized, emergency diesel generator would replace the existing one rather than a larger version as under the proposed project or project variant. The change in the mix of uses would generate 11 percent more daily vehicle trips than the proposed project or project variant during project operation. Therefore, slightly more operational toxic air contaminants would be generated than under the proposed project or project variant. Despite the reduction in total floor area, the shortened construction duration would result in a slightly higher construction emission rate, which increases health risks. As shown in Table 4.E.10 and Table 4.E.11 (see pp. 4.E.58 and 4.E.61), the contribution of operational vehicle traffic to the total cancer risk and $PM_{2.5}$ concentration for the proposed project and project variant at the maximally exposed off-site and on-site receptors would be very small. Therefore, an 11 percent increase in operational traffic would not increase the cancer risk or $PM_{2.5}$ concentration enough to exceed significance thresholds. Additionally, a 25 percent increase in the construction emission rate, resulting from a lower construction duration and therefore reduced exposure duration, would not increase the cancer risk or $PM_{2.5}$ concentration enough to exceed significance thresholds. Total excess cancer risk for the proposed project or project variant (36 in 1 million) would be well below the threshold of 100 in 1 million (see Table 4.E.10). Therefore, the slightly higher toxic air contaminant emissions attributable to construction and operations under Alternative D also would be below significance thresholds and would not result in off-site or on-site sensitive receptor locations meeting the Air Pollutant Exposure Zone criteria for annual average $PM_{2.5}$ concentrations and excess cancer risk. The impact would be less than significant.

Consistency with Clean Air Plan

As with the proposed project or project variant (see Impact AQ-4, pp. 4.E.60-4.E.65), Alternative D would support the primary goals of the *2017 Bay Area Clean Air Plan*. Alternative D would implement all applicable control measures including car-share parking, unbundled parking and electric vehicle charging stations; would develop a transportation demand management program to promote the use of transit, walking and bicycling as viable options to privately owned vehicles; and would pay a fair-share contribution to the SFMTA to improve local bus service as part of identified mitigation (see Mitigation Measure M-TR-4, pp. 4.C.87-4.C.88). Therefore, Alternative

D would not conflict with, or obstruct implementation of the *2017 Bay Area Clean Air Plan*, and this impact, as with the proposed project or project variant, would be less than significant.

Odors

Although there may be some potential for small-scale, localized odor issues around the construction site or the proposed site uses under Alternative D, e.g., from construction site activities and solid waste collection, substantial odor sources and consequent effects on sensitive receptors would be unlikely. Therefore, like the proposed project or project variant, Alternative D would not create objectionable odors that would affect a substantial number of people.

Cumulative Air Quality Impacts

As explained for the proposed project and project variant (see Impact C-AQ-1, p. 4.E.66), the contribution of a project's individual air pollutant emissions to regional air quality impacts is, by its nature, a cumulative effect. As with the proposed project or project variant, the air quality impacts of Alternative D would be less than significant. Therefore, Alternative D would not contribute considerably to significant cumulative regional air quality impacts.

Although Alternative D would generate more vehicle trips than the proposed project or project variant, as described above, the contribution of operational vehicle traffic to the total cumulative lifetime cancer risk and $PM_{2.5}$ concentration from the proposed project and project variant would be less than 1 percent (as shown in Table 4.E.12 and Table 4.E.13 for off-site and on-site receptors, respectively [see pp. 4.E.68-4.E.69]). Therefore, the 11 percent increase in operational vehicle trips would not be substantial enough for Alternative D to exceed significance thresholds for cancer risk and $PM_{2.5}$ concentration. Thus, Alternative D would result in a less than significant cumulative health risk impact, similar to that of the proposed project or project variant. As with the proposed project or project variant, the addition of the health risks associated with Alternative D, which would be similar to those for the proposed project or project variant, to the worst-case background risks would also not exceed thresholds and result in the expansion of the mapped Air Pollutant Exposure Zone. Thus, under Alternative D, as with the proposed project or project variant, cumulative construction and operational related air quality impacts would be less than significant, and mitigation would not be needed.

INITIAL STUDY TOPICS

Land Use and Planning

Alternative D would be a new mixed-use development within an existing city block. Without Walnut Walk, Alternative D would provide less integration with the surrounding neighborhood than the proposed project or project variant. In all other respects, Alternative D would have the same less-than-significant project-level impacts as the proposed project or project variant (see

Topic E.1, Land Use and Planning, of the initial study, pp. 110-112), and would not combine with other cumulative land use changes in the vicinity of the project site to create a significant land use and planning cumulative impact.

Population and Housing

Alternative D would introduce 1,031 new residents to the site, a reduction of 230 residents compared to the proposed project and 650 residents compared to the project variant. The office building in Alternative D would accommodate approximately 1,435 employees, an increase in on-site employment, and approximately 1,040 more employees than the proposed project and 1,229 more than the project variant. Although greater than that for the proposed project or project variant, employment growth associated with Alternative D, at approximately 1 percent of estimated citywide employment growth between 2020 and 2040, would not be substantial, would be negligible in the citywide context, and would be less than significant.

The demand for housing that would result from the increase in the employee population would be greater than that under the proposed project or project variant. The new employees under Alternative D would generate a demand for approximately 1,087 new residential units, approximately 788 or 931 more residential units than with the proposed project or project variant. This would be approximately 1.6 percent of the city's estimated household growth between 2020 and 2040. As with the proposed project or project variant, a portion of this housing demand might be satisfied with the proposed new residential units on the site. Although greater than that for the proposed project or project variant, employment growth and related housing demand associated with Alternative D would not be substantial in the context of total household growth in the city, and would be less than significant.

Like the proposed project or project variant, which would have less-than-significant population and housing impacts (see Topic E.2, Population and Housing, of the initial study [pp. 112-120]), this alternative would not induce substantial population growth, would not generate a substantial increase in employment-related housing demand, and would not displace any existing housing units or people. As such, Alternative D would have less-than-significant project-level impacts, and, like the proposed project or project variant, would not combine with other cumulative projects in the vicinity or at the citywide level to create a significant cumulative impact related to population and housing (inclusive of consideration of the continued and expanded office use).

Cultural Resources (Archaeological Resources)

Although Alternative D would have reduced grading and overall construction programs compared to the proposed project and project variant, it would have substantially the same project-level and cumulative impacts on archaeological resources (including impacts related to human remains and tribal cultural resources) as those identified for the proposed project and project variant. The mitigation measures identified in the initial study on pp. 129-133 and p. 135, would continue to apply and would reduce the project-level impacts to a less-than-significant level, as with the proposed project and project variant, and its contribution to the identified significant cumulative impact related to subsurface archaeological resources associated with the Laurel Hill Cemetery to less than considerable.

Greenhouse Gas Emissions

Alternative D would include approximately 2 percent less floor area than the proposed project and 9 percent less than the project variant; the construction program and development footprint would be slightly smaller than the proposed project or project variant; and more of the existing building would be retained. Therefore, Alternative D would result in fewer construction and operation-related greenhouse gas emissions compared to the proposed project and project variant. While the increased amount of office space would result in an up to 10 percent increase in daily vehicle trips compared to the proposed project or project variant, compliance with applicable regulations would ensure that Alternative D would be consistent with the City's GHG Reduction Strategy as well as regional and state plans and policies related to GHG emissions reduction efforts (see Topic E.7, Greenhouse Gas Emission, of the initial study, pp. 146-150). Thus, as with the proposed project or project variant, cumulative impacts related to GHG emissions would be less than significant.

Wind and Shadow

Under Alternative D, the building footprints of the new buildings along California Street would be the same as that for the project variant; however, the heights of the Plaza A and Plaza B buildings would each be 20 feet taller (65 feet, not 45 feet). The Walnut and Mayfair buildings and six (not seven) Laurel Duplexes would be the same heights as in the proposed project or project variant. The Masonic and Euclid buildings would not be built. The retained existing building at the center of site would be approximately 12 feet shorter than under the proposed project or project variant.

Wind

Under Alternative D wind conditions along the public sidewalks on California and Laurel streets would be altered, as with the proposed project or project variant. Wind conditions on public areas at the north and west edges of the project site would be similar to, but slightly more pronounced, than those described for the proposed project or project variant (see Topic E.8, Wind and Shadow, of the initial study, pp. 151-156). The channelizing effect of winds along California Street would also be slightly more pronounced because the new buildings would be slightly taller than some of the upwind structures on the north side of California Street (ranging from 40 to 65 feet from the west to east). Overall, incremental change to wind speeds from a 20-foot height increase to the Plaza A and Plaza B buildings would not be substantial enough to cause new wind hazards.

Wind conditions at all other locations (the grass lawn at Laurel Street and Euclid Avenue and public sidewalks on Laurel Street and Euclid, Masonic, and Presidio avenues) would be similar to, or slightly reduced from, conditions with the proposed project or project variant because new buildings would not be constructed on the southern or eastern portions of the project site.

Thus, any changes to wind speeds in public areas would not be substantial enough to contribute to an exceedance of the wind hazard criterion, and wind impacts would remain less than significant. Although Alternative D would have increased building heights along California Street compared to the proposed project or project variant, it also would not combine with cumulative projects in the vicinity of the project site to generate a significant cumulative wind impact.

Shadow

Under Alternative D, building height at the center of the site would be approximately 12 feet lower than under the proposed project or project variant and therefore would cast shorter shadows than the proposed project or project variant and would not shade public open space. The increased height of the proposed Plaza A and B buildings would not result in shadow on the Laurel Hill Playground or the Presidio Heights Playground because of the distance from the project site and the presence of intervening structures. Under Alternative D, shadow cast on public sidewalks would not be as extensive because fewer buildings would be constructed along the perimeter of the site. Therefore, as with the proposed project or project variant, shadow impacts under Alternative D would be less than significant and, even with increased building heights along California Street compared to the proposed project or project variant, would not combine with cumulative projects in the vicinity of the project site to create a significant cumulative impact related to shadow.

Recreation

Alternative D, with 456 residential units, would introduce 1,031 new residents to the site, a reduction of 230 residents and 650 residents from the proposed project and project variant, respectively. Similar to the proposed project and project variant, Alternative D would develop common and private open space to accommodate new residential uses, and more of the existing open and landscaped areas would be retained. Therefore, the new residential use would generate less demand for recreational resources compared to the proposed project and project variant and similarly would not substantially increase the use of existing recreational facilities or require construction of new or expanded facilities. The existing office uses would be retained and the employee population would be greater than that under the proposed project or project variant. The increase in the worker population would not substantially increase over the existing employee population (an increase of 225 employees) and would not accelerate the physical deterioration of existing parks and recreation facilities nearby, because workers would not be expected to frequent these facilities on a regular basis due to their distance from the office building.

Alternative D would continue to have less-than-significant project-level impacts as described in Topic E.9, Recreation, of the initial study (pp. 163-170), and, as with the proposed project or project variant, would not combine with other cumulative projects in the vicinity or at the citywide level to create a significant cumulative impact related to recreation.

Utilities and Service Systems

There would be fewer residents and more employees in Alternative D than the proposed project and project variant, approximately 225 more employees than work at the site now. Water and wastewater demand under Alternative D would increase relative to existing conditions, but would be slightly less than that evaluated under the proposed project or project variant. Compliance with the Non-Potable Water Ordinance and other required conservation measures would reduce water use as well as some wastewater flows for all alternatives, as with the proposed project or project variant. Because wastewater flows would be less than under the proposed project or project variant, they would remain within the capacity of the Southeast Water Pollution Control Plant, as discussed in Topic E.10, Utilities and Service Systems, of the initial study, pp. 173-188. No new facilities would be required. Thus, the impact on these utilities would be less than that for the proposed project or project variant, and would remain less than significant.

Development would trigger the requirements of the City's Stormwater Management Requirements and Design Guidelines, and stormwater flows to the combined sewer system would be reduced by 25 percent. Similarly, ordinances requiring recycling and composting related to reducing solid waste in landfills would apply. Therefore, Alternative D would not result in substantially different impacts on the combined stormwater/wastewater system or landfill facilities than described for the proposed project or project variant in the initial study.

Alternative D would have less-than-significant project-level impacts on utilities and service systems, and would not combine with cumulative projects in the site vicinity to generate a significant cumulative impact related to utilities and service systems.

Public Services

Alternative D would have fewer residents and more employees than the proposed project and project variant. For the same reasons identified for the proposed project and project variant in the initial study (pp. 189-197), supplemented in Section 4.F, Alternative D would have less-than-significant project-level impacts, and would not combine with cumulative projects in the site vicinity to generate a significant cumulative impact related to public services.

Biological Resources

Compared with the proposed project and project variant, Alternative D would reduce impacts on biological resources because it would result in slightly less ground disturbance, remove fewer trees and vegetation, and have a reduced overall construction program. No skybridge would be constructed under this alternative. As with the proposed project and project variant, Alternative D would require mitigation as described on initial study pp. 200-201). The discussion of project-level and cumulative biological resources impacts for the proposed project or project variant on initial study pp. 197-204, the mitigation measure identified to reduce impacts on nesting birds, and the conclusion of less-than-significant impacts with mitigation are applicable to Alternative D. Like the proposed project, Alternative D would not combine with cumulative projects in the vicinity of the site, or at the citywide level, to create a significant cumulative biological resources impact.

Geology and Soils

Alternative D would involve less excavation and soil disturbance and would have a slightly smaller development footprint compared to the proposed project and project variant. As with the proposed project and project variant, Alternative D would require mitigation in the event of inadvertent discovery of paleontological resources (see initial study pp. 214-215). All other geology and soils issues would be the same as discussed for the proposed project or project variant on initial study pp. 205-216, and, with a reduced development program, Alternative D's project-level and cumulative impacts (in combination with the same cumulative projects) would remain less than significant.

Hydrology and Water Quality

The Alternative D development footprint would be slightly smaller than that for the proposed project or project variant and there would be less ground disturbance with fewer changes to the existing site. Therefore, impacts on hydrology and water quality during construction would remain less than significant as with the proposed project and project variant (see Topic E.14, Hydrology and Water Quality, initial study pp. 216-227). Operational impacts related to hydrology and water quality would also be similar to or less than those identified for the proposed project or project variant, as discussed. Thus, with a reduced development program, Alternative D's project-level and cumulative impacts (in combination with the same cumulative projects) would be less than significant.

Hazards and Hazardous Materials

Under Alternative D the demolition, excavation, and construction program and development footprint would be smaller than the proposed project and project variant. The existing annex building would be demolished. The existing office building would be retained with limited demolition in comparison to the proposed project and project variant for its continued use as an office building.

Alternative D would involve the removal of hazardous building materials and soils as with the proposed project or project variant. The volume of demolished building materials and excavated soils that would be classified as hazardous waste would be reduced due to the more limited building demolition and excavation program, i.e., less ground disturbance than the proposed project or project variant. As discussed under Topic E.15, Hazards and Hazardous Materials, initial study pp. 227-240 and supplemented in Section 4.F, excavation for the California Street Garage, and in particular the northwest corner (Plaza A Building) of the site, would be in areas where known hazardous contaminants persist in the subsurface soils due to historic uses on the site, and in areas where serpentinite (typically containing naturally occurring asbestos) may be encountered, as with the proposed project or project variant. Because the overall excavation program would be more limited under Alternative D, the potential to encounter naturally occurring asbestos would also decrease. Alternative D would be subject to the same regulatory requirements associated with the routine handling, transport, and disposal of hazardous materials, and the project sponsor would be required to create and implement a site mitigation plan, construction dust control plan, and asbestos dust control plan. Current UCSF laboratory uses would be removed in accordance with UC requirements and California Department of Public Health regulations for the closure and transport of hazardous materials associated with the laboratory use. For these reasons, as with the proposed project or project variant, hazardous materials impacts would be less than significant. As discussed for the proposed project and project variant, use of common hazardous materials during operation would also result in less-than-significant impacts for this alternative.

Access to the site perimeter would be similar to existing conditions, and new access into the site would be provided with the Walnut Street extension and Mayfair Walk. Therefore, like the proposed project or project variant, Alternative D would not interfere with an adopted emergency response plan or emergency evacuation plan and the impact would be less than significant impact.

Therefore, like the proposed project and project variant, Alternative D would also have less-than-significant project-level impacts related to hazards and hazardous materials. With a reduced development program, Alternative D’s cumulative impact related to hazards and hazardous materials (in combination with the same cumulative projects) would be less than significant.

Mineral and Energy Resources

As with the proposed project and project variant, Alternative D would have no impact on a mineral resource (see Topic E.17, Mineral and Energy Resources, initial study pp. 240-246). With a reduced development program, including a smaller construction program) impacts on energy resources would be less than significant, like the proposed project and project variant. As with the proposed project or project variant, Alternative D would not combine with cumulative projects in the vicinity or at the citywide level to generate a significant cumulative impact related to mineral and energy resources.

Agricultural and Forest Resources

As with the proposed project, project variant, and all other alternatives, Alternative D would have no impacts related to agricultural and forest resources.

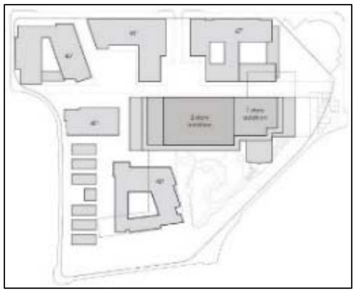
CONCLUSION

By retaining many of the character-defining features of the historic resource at 3333 California Street (the existing historic structure [with minor modifications] and some of the associated site and landscape features) and limiting demolition compared to the proposed project or project variant, Alternative D would reduce the significant impact on the historic architectural resource, but not to a less-than-significant level. With new construction, changes to the site and landscape features that convey the project site's corporate campus setting would be substantial enough to generate a similar impact as the proposed project or project variant. Thus, as with the proposed project or project variant, Alternative D would implement Mitigation Measures M-CR-1a and M-CR-1b, but the impact on the historic architectural resource would remain significant and unavoidable.

Unlike the proposed project and project variant, under Alternative D the VMT impact would be less than significant without mitigation because the retail and other non-residential uses would provide parking at rates that would be similar to the neighborhood parking rates for those uses. Like the proposed project or project variant, Alternative D would generate significant and unavoidable impacts related to transportation and circulation (transit capacity) and construction noise. With regard to construction vibration (damage to off-site structures) and operational noise (stationary sources), impacts would be less than significant with mitigation, the same as under the proposed project or project variant. As with the proposed project or project variant, air quality impacts under Alternative D would be less than significant.

Under Alternative D no other significant impacts beyond those identified in the initial study for the proposed project or project variant, i.e. archaeological resources (including human remains and tribal cultural resources), biological resources, and paleontological resources would occur. The same mitigation measures for the proposed project and project variant identified in the initial study would also be applicable to Alternative D, and impacts would be reduced to less-than-significant levels.

F. ALTERNATIVE E: PARTIAL PRESERVATION – RESIDENTIAL ALTERNATIVE

Overview: 	Existing office building partially retained and adapted for residential use. Two-story addition constructed on roof. Annex building demolished. Parking garage under existing building partially retained. Twelve new buildings (Plaza A, Plaza B, Walnut, Mayfair, and Euclid buildings, and 7 Laurel Duplexes) constructed along California Street, Laurel Street, and Euclid Avenue on the northern, western, and southern portions of the site. California Street, Mayfair, and Euclid garages and six garages for Laurel Duplexes constructed. Uses: Residential, retail, daycare, and parking; no office.
Character-Defining Features Retained:	Character-defining features of existing building partially retained. Site and landscape features contributing to corporate campus setting partially retained. View of project site from the east on Pine Street (looking west) and from the south on Masonic Avenue (looking north) toward the existing office building and open landscaped site altered.
General Comparison to Proposed Project and Variant:	• Slightly reduced overall land use program; one less new building (Masonic Building). • Modified Euclid Building footprint to accommodate retention of private courtyard on southeast side of building. • Euclid Building shorter with smaller footprint. Greater setback along Euclid Avenue.

LAND USE PROGRAM

Alternative E would have a total of 1,267,740 gross square feet of new and rehabilitated space, as follows:

- 811,867 gross square feet of residential floor area (588 residential units)
- 44,306 gross square feet of ground floor retail spaces
- 396,917 gross square feet of parking
- 14,650 gross square feet of daycare center space

The Plaza A and Plaza B buildings would contain residential and retail uses; the Walnut Building would contain residential, retail, and daycare uses; and the adaptively reused building, the Mayfair and Euclid buildings, and the Laurel Duplexes would contain residential uses. As with the project variant, there would be no office uses. Four garages with up to three subterranean levels (the new California Street, Mayfair, and Euclid garages, the retained parking garage under the existing office building, and individual parking garages for the Laurel Duplexes) would provide up to 800 vehicle parking spaces, including 8 car-share spaces and 60 commercial spaces. (See Table 6.1, pp. 6.13-6.15.)

The overall land use program would be slightly reduced compared to the proposed project (8 percent) and project variant (14 percent), with slightly less residential floor area (but more residential units than the proposed project and fewer than the project variant) and similar amounts of retail and daycare space. The mix of studio, one-bedroom, and two-bedroom residential units would be different under this alternative. (See Table 6.1, pp. 6.13-6.15, for a comparison to the proposed project and project variant.)

OVERVIEW

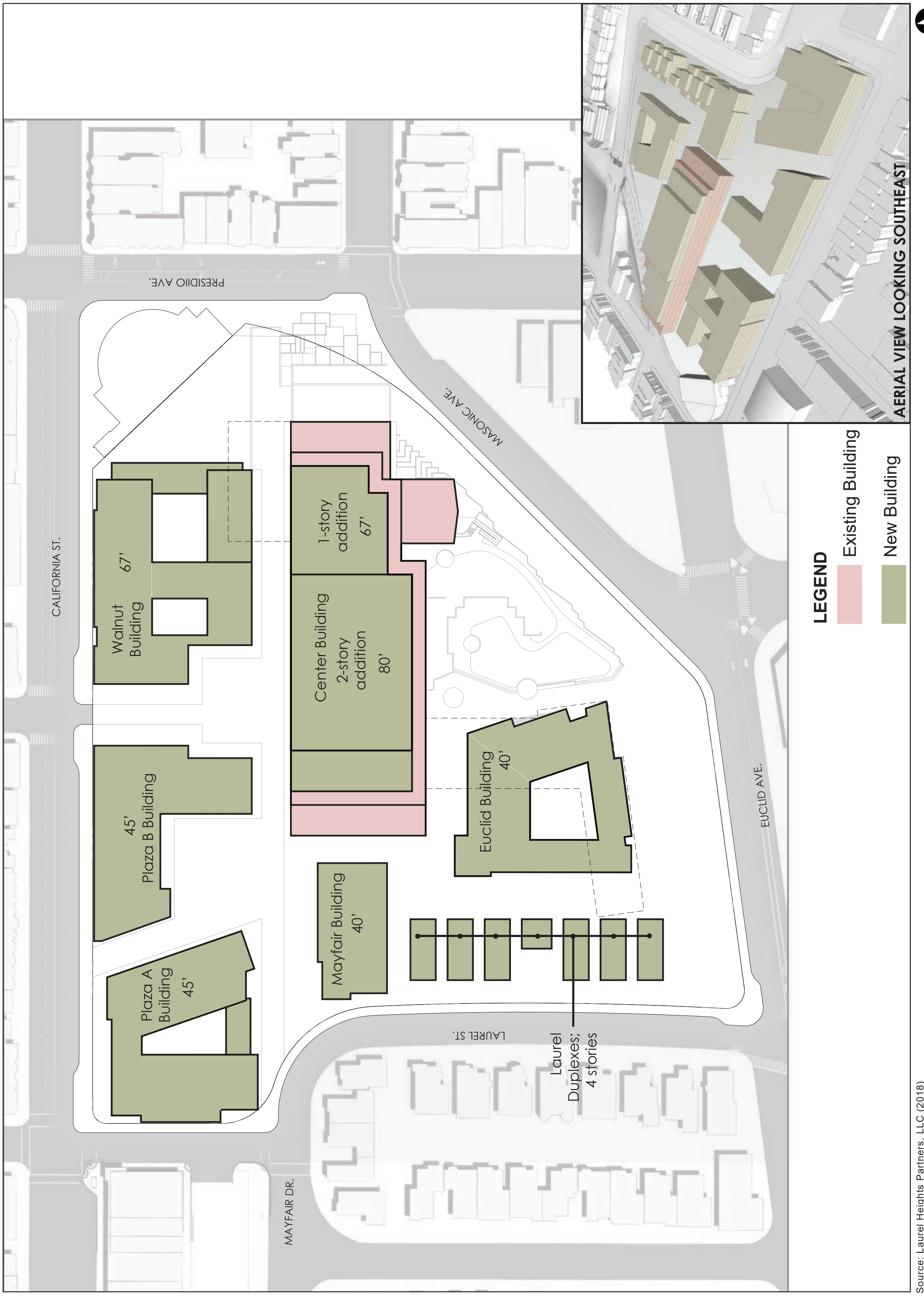
Under Alternative E, the existing office building would be partially retained as a single building and adapted for residential use, with a two-story addition on the roof. The existing building's south wing and the private courtyards on its south and east sides would be removed. The private courtyard on the east side of the building would be partially reconstructed.

As shown on Figure 6.11: Alternative E: Partial Preservation - Residential Alternative Site Plan, 12 new buildings (the Plaza A, Plaza B, Walnut, Mayfair, and Euclid buildings, and seven Laurel Duplexes), three below-grade garages (California Street Mayfair, and Euclid garages), and six individual parking garages (for Laurel Duplexes) would be constructed along California Street, Laurel Street, and Euclid Avenue on the northern, western, and southern portions of the site. As with the proposed project and project variant, the southern portion of the project site would be redeveloped but with one new multi-unit building instead of two. Existing conditions on the eastern portion of the project site along Masonic Avenue would be retained with minimal changes beyond the partial reconstruction of the southeast courtyard as part of the adaptive reuse of the existing building.

The most prominent views of the project site, from the east on Pine Street (looking west) and from the south on Masonic Avenue (looking north), would be altered. Views from the west along Laurel Street looking east to the site and existing building would also be obscured as under the proposed project or project variant.

REUSE OF EXISTING BUILDING

Under Alternative E, the footprint of the building would be altered but less so than under the proposed project and project variant. While the south wing and associated landscape and the northerly extension of the east wing would be demolished, like the proposed project and project variant, the center of the remaining existing building would not be removed to create two separate buildings connected by a bridge. A two-story addition, set back on all sides except the north side, would be constructed above the existing building; this addition would be shorter and less noticeable than the additions for the proposed project or project variant and the setbacks would make the addition more visually subordinate to the existing building. As with the proposed



Source: Laurel Heights Partners, LLC (2018)

3333 CALIFORNIA STREET MIXED-USE PROJECT

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FIGURE 6.11: ALTERNATIVE E: PARTIAL PRESERVATION - RESIDENTIAL ALTERNATIVE SITE PLAN

project and project variant, the existing office building's mechanical equipment rooms would be removed to accommodate the vertical addition. Unlike the proposed project or project variant, the existing auditorium space would be retained as an amenity for future residents.

The glass curtain wall system would be replaced with a compatible design that reflects the new residential use. A portion of the three-level, partially below-grade parking garage would also be retained; however, the circular garage ramp structures and the annex building and perimeter brick wall that borders the north and west (partial) boundaries of the project site would be demolished.

With the addition of two floors and the enclosure of the northeastern and southwestern portions of the existing building (i.e., where the northerly extension of the east wing and the whole south wing would be demolished), there would be a total of 330,282 gross square feet of residential uses (or 162 residential units) in the adaptively reused residential building (see Table 6.1, pp. 6.13-6.15).

NEW CONSTRUCTION

The land use program, footprints, and heights for the Plaza A, Plaza B, Walnut, and Mayfair buildings and the Laurel Duplexes would be similar to the project variant. New construction under Alternative E would be more limited than under the proposed project and project variant but expanded from that under the full preservation alternatives and Alternative D to add development along Euclid Avenue on the southern portion of the site. There would be no new construction along Masonic Avenue southeast of Euclid Avenue, as the Masonic Building would not be built. The footprint of the Euclid Building would be reduced compared to the proposed project or project variant to retain the existing private courtyard to the east, and the building would be four stories tall instead of six.

The Euclid Building would be bounded by the private terraces and landscaped area between it and the adaptively reused residential building on the north, the adaptively reused residential building's courtyard on the east, Euclid Avenue on the south, and by the private terraces and landscaped area between it and the Laurel Duplexes on the west. It would be set back approximately 100 feet from the south (Euclid Avenue) property line, instead of 67 feet as under the proposed project or project variant. The Euclid Building would not include a retail use, as under the proposed project and project variant. (See Figure 6.12: Alternative E: Partial Preservation - Residential Alternative Building Massing, for building massing on the project site from different locations around the site.)

Source: Laurel Heights Partners, LLC (2018)

3333 CALIFORNIA STREET MIXED USE PROJECT

FIGURE 6.12: ALTERNATIVE E: PARTIAL PRESERVATION - RESIDENTIAL ALTERNATIVE BUILDING MASSING

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SITE ACCESS AND PARKING

PARKING AND CIRCULATION

Parking

Alternative E would provide three new below-grade parking garages: the California Street, Mayfair, and Euclid garages; and would partly retain the parking garage under the existing building. The Masonic Garage would not be built. Each of the Laurel Duplexes (except the fourth duplex at the Laurel Street midblock) would have private, two-car parking garages. The Euclid Garage would have a smaller footprint than the Masonic Garage planned for the proposed project and project variant.

As with the proposed project or project variant, the parking program would replace and expand the existing 543 surface and subsurface parking spaces on the project site. Overall, there would be a total of 800 off-street parking spaces: 588 spaces for residential uses, 115 spaces for retail uses, 29 spaces for the daycare use, 60 commercial parking spaces, and 8 car-share spaces. Alternative E would provide 96 fewer parking spaces than the proposed project and 170 fewer spaces than the project variant. The Mayfair and Euclid garages would provide 166 off-street residential parking spaces for the adaptively reused residential building (66 spaces), Euclid Building (68 spaces), Mayfair Building (30 spaces), and the Laurel Duplexes (2 spaces). The other 12 off-street residential parking spaces for the Laurel Duplexes would be provided within the private, two-car parking garages for all but one of the Laurel Duplexes.[23]

All other off-street parking associated with the residential use (410 spaces) would be in the California Street Garage and the retained parking garage under the adaptively reused residential building. All off-street parking associated with retail (115 spaces) and daycare (29 spaces) uses and the commercial parking spaces (60) and car-share spaces (8) would be located in the California Street Garage.

As with the proposed project or project variant, Alternative E would reduce the number of on-street vehicle parking spaces due to the introduction of new curb cuts and the conversion of on-street parking spaces to commercial and passenger loading zones. Overall, there would be a net reduction of 32 on-street parking spaces (four fewer than under the proposed project or project variant).

[23] The two parking spaces for the fourth Laurel Duplex would be provided within the Euclid Building Garage.

Circulation

Vehicles would enter and exit the California Street and Mayfair garages and the Laurel Duplexes from the same access points as under the proposed project and project variant, except that there would be one less entry/exit driveway on Masonic Avenue and a new entry/exit driveway onto Euclid Avenue between Masonic Avenue and Laurel Street. The renovated below-grade parking levels in the retained garage would connect to Basement Levels B1 and B3 of the California Street Garage via the eastern entry-exit off the Walnut Street extension for Basement Level B1, the access driveway from Presidio Avenue, and an internal garage ramp for Basement Level B3. (See Figure 6.13: Alternative E: Partial Preservation – Residential Alternative Site Access for site and garage access points and the footprint of the retained and new parking garages.) Emergency vehicles would continue to have access to the perimeter of the project site; they would access the center of the site via the Walnut Street extension and the west end of Mayfair Walk.

Circulation changes under Alternative E would be similar to the proposed project and project variant. The primary difference would be the addition of one new curb cut on Euclid Avenue, and the removal of one of the two proposed curb cuts on Masonic Avenue between Euclid and Presidio avenues. In all other respects the circulation changes under Alternative E would be similar to that for the proposed project or project variant.

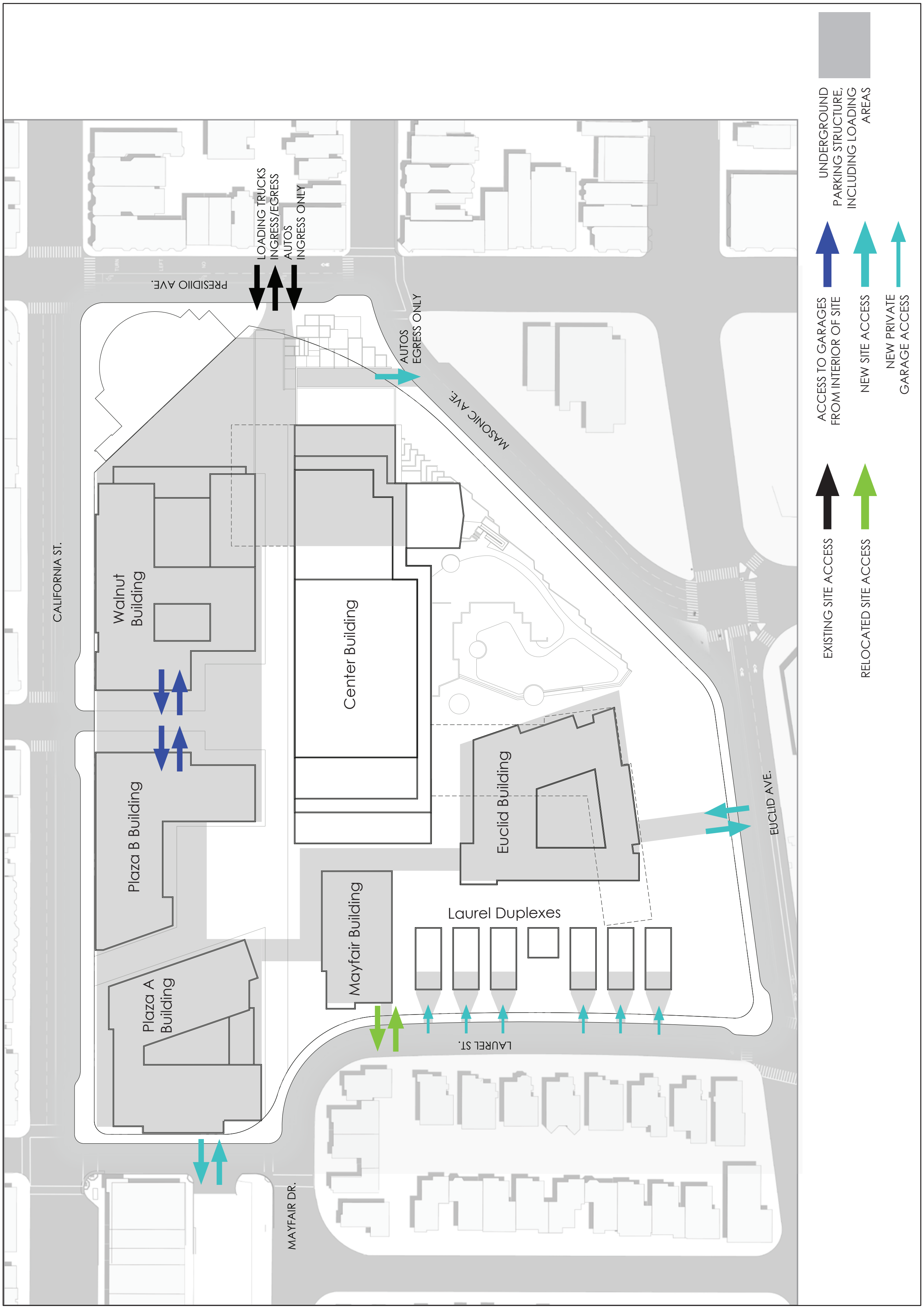
PEDESTRIAN CIRCULATION

Under Alternative E the project site would not be fully integrated with the existing street grid. Pedestrians would not be able to walk through the site to Masonic and Euclid avenues because Walnut Walk and the Corner Plaza would not be constructed. Public access to the green lawn (Euclid Green) at the corner of Laurel Street and Euclid Avenue would be provided, as with the proposed project or project variant.

FREIGHT AND PASSENGER LOADING PROGRAM

There would be eight on-street freight and passenger loading spaces, two fewer than the proposed project or project variant, and five off-street freight loading spaces, one fewer than the proposed project or project variant.

Freight and Passenger Loading: Five off-street commercial and residential freight loading spaces (not six as with the proposed project and project variant) would be developed: three spaces in the off-street freight loading area in the California Street Garage, accessed from Presidio Avenue, and two new spaces in the off-street freight loading area in the Euclid Garage, accessed from Euclid Avenue. Alternative E's off-street and on-street freight-loading spaces would be in locations similar to those of the proposed project and project variant, resulting in the removal of five on-street parking spaces. There would be two rather than three on-street passenger loading zones,



Source: Laurel Heights Partners, LLC (2018)

3333 CALIFORNIA STREET MIXED-USE PROJECT

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FIGURE 6.13: ALTERNATIVE E: PARTIAL PRESERVATION - RESIDENTIAL ALTERNATIVE SITE ACCESS

one each on Euclid Avenue and Laurel Street, converting six instead of ten on-street parking spaces. In addition, under Alternative E, as with the proposed project or project variant, passenger loading would occur at the roundabout at the terminus of the Walnut Street extension into the project site, and daycare center pick-up/drop-off activities would occur at Basement Level B3 of the California Street Garage.

Residential Move-In and Move-Out Loading: Under Alternative E residential move-in and move-out loading activities for the new buildings would occur in the same garage and on-street locations as with the proposed project or project variant. Residential move-in and move-out loading activities for Alternative E would also occur in the Euclid Garage.

Trash/Waste Pick-Up: As with the proposed project or project variant, solid waste would be collected at the refuse staging area adjacent to the off-street freight loading dock in the California Street Garage and compacted for offsite transport. There would be a second off-street loading dock for solid waste pick-up in the Euclid Garage in Alternative E (not the Masonic Garage). As with the proposed project or project variant, solid waste from the off-street loading docks and at the Laurel Street curb would be picked up by Recology on a regularly scheduled service program.

STREETSCAPE CHANGES

Most streetscape changes under Alternative E would be the same as those in the proposed project or project variant (see Table 6.1, pp. 6.13-6.15). Unlike the proposed project or project variant, the streetscape and roadway changes at the intersection of Masonic and Euclid avenues would not be constructed. Site development under Alternative E would comply with the Urban Forestry Ordinance similar to the proposed project or project variant; and the removal of significant trees would require application and approval of a permit from public works.

ABILITY TO MEET PROJECT OBJECTIVES

Alternative E would meet most of the basic project objectives, although in most cases to a lesser degree than would the proposed project or project variant. Alternative E would redevelop a large underutilized commercial site at about the same development intensity and with a similar mix of uses (except for the office use), improving and encouraging walkability and convenience (Objectives 1 and 2). This alternative would increase the City's housing supply (Objective 3) with 588 residential units, 30 more units than the proposed project, but 156 fewer units than the project variant. Alternative E would open and connect the site to the surrounding community by extending the neighborhood urban pattern and surrounding street grid into the site through a series of pedestrian pathways and open spaces, but to a lesser degree, as only Mayfair Walk, and not Walnut Walk, would be developed to extend through the entire site (Objective 4). Alternative E would provide a similar level of active ground floor retail uses, but fewer activated neighborhood-friendly spaces along the adjacent streets, and therefore would achieve Objective 5 to a lesser degree than the proposed project or project variant. Alternative E would provide a high quality and varied architectural and landscape design, utilizing the site's topography and other unique characteristics (Objective 6). Alternative E would construct some open spaces such as the plazas and Mayfair Walk that would be usable to project residents and surrounding community members, but not as many as the proposed project or project variant, and therefore would achieve Objective 7 to a lesser degree than the proposed project or project variant. Alternative E would meet Objective 8 by providing code-required open space; however, open space would not be as varied or designed to maximize pedestrian accessibility. Alternative E would include sufficient off-street parking to meet the project's needs (Objective 9), and it would retain and integrate the existing office building into the development (Objective 10).

CONSTRUCTION

Alternative E would be constructed in approximately 6.5 years in four phases. Construction activities included in each of the phases are listed below; and, as with the proposed project or project variant the order of the construction phases may change.

- First phase: Demolition of the existing annex building, circular garage ramp structures, the northerly extension of the east wing of the existing office building, and the south wing of the existing office building; and excavation and site preparation for construction of the Euclid Building (and associated Euclid Garage).
- Second phase: Rehabilitation and adaptive reuse of the existing office building.
- Third phase: Demolition of the surface parking lots on the north portion of the site and excavation and site preparation for construction of the California Street buildings and associated California Street Garage.
- Fourth phase: Demolition of the surface parking lot and associated landscaping on the west portion of the site near Laurel Street for construction of the Mayfair Building (and associated Mayfair Garage) and the Laurel Duplexes.

As with the proposed project or project variant, excavation for Alternative E would extend to a depth of approximately 40 feet below ground surface and would encounter bedrock (including naturally occurring asbestos); however, the total volume of excavated soils and construction demolition debris would be less than that for the proposed project or project variant. Site disturbance would occur in an area with known soil and groundwater contamination from historic uses. Thus, site redevelopment would be conducted pursuant to a required site mitigation plan.

IMPACTS OF ALTERNATIVE E: PARTIAL PRESERVATION – RESIDENTIAL ALTERNATIVE

CULTURAL RESOURCES (HISTORIC ARCHITECTURAL RESOURCES)

Approach

The historic preservation approach for Alternative E focused on the adaptive reuse of the existing building for residential uses and retaining some character-defining features of the building, site, and landscape. (See Table 6.1, pp. 6.13-6.15 for the disposition of the character-defining features under Alternative E, and Figure 6.11 and Figure 6.12, p. 6.137 and 6.139). Under Alternative E the existing office building would be partially retained. Site and landscape features would also be partially retained, but to a lesser extent than Alternative D.

Retention of Character-Defining Features

The disposition of the site and landscape features under Alternative E is as follows:

Character-Defining Features	Level of Retention (Alternative E)
Existing Office Building	**Partially Retained**
Stepped multi-story massing built into the natural topography of the site	Partially retained
Office building encompassing three distinct building phases that have all taken on significance	Partially retained, partial demolition of east wing and whole south wing
Midcentury Modern architectural style with little ornamentation	Retained
Flat, cantilevered roof with projecting eaves	Retained
Continuous full-height, slightly recessed curtain wall glazing on most sides and along all levels of the building	Replaced with compatible residential window wall system
Glass curtain wall composed of bronze powder-coated aluminum framing system in a regularly spaced pattern of mullions and muntins, typically with a small spandrel panel of obscure glass below a larger pane	Replaced with compatible residential window wall system
Site and Landscape	**Partially Retained**
Corporate campus setting featuring an office building located on a large, open landscaped site across 10.25 acres	Partially retained, development limited to 12 new buildings on the surface parking lots and open areas on the northern, western, and southern portions of site
Landscape utilizing curvilinear shapes in pathways, driveways, and planting areas; and other integrated landscape features (planter boxes, seating)	Partially retained
– *elements on northern and western portions of the project site*	– *Demolished*
– *open space/sloped lawn on Laurel Street*	– *Demolished*
– *open space/lawn at Presidio and Masonic avenues*	– *Demolished*

(continued)

Character-Defining Features	Level of Retention (Alternative E)
– *elements of the private courtyard/landscaped areas on south and east sides of the existing office building*	– *Partially retained and reconstructed*
Main entrance leading from Walnut and California streets	Retained
Brick perimeter walls, integrated planter boxes, and retaining walls of reinforced concrete and clad in stretcher bond pattern	Demolished
– *Perimeter brick wall that borders north and west (partial) boundaries of project site*	– *Demolished*
– *Brick retaining walls in the private courtyard/landscaped area on south side of existing office building*	– *Demolished*
– *Brick retaining walls in the private courtyard/landscaped area on east side of existing office building*	– *Partially retained and reconstructed*
Mature trees around the corporate modern campus	Mostly retained, with removal of some mature trees along northern and western portions of site
Open area along Euclid Avenue and Laurel Street	Partially retained, new driveway developed in open area between Laurel Street and Masonic Avenue
Concrete pergola atop terraced planting facing Laurel Street	Demolished

Under Alternative E fewer changes would be made to the existing office building than would occur with the proposed project or project variant. The major differences between Alternative E and the proposed project and project variant are the retention of the building as one structure, the retention of the auditorium, and the reconstruction of the character-defining features on the southeast portion of the site, which includes the open area and distinctive landscape features of the private courtyard on the east side of building. Under Alternative E, new construction would be focused on the northern, western, and southern portions of the site. The southeastern portion of the site would be not be altered as substantially as it would under the proposed project or project variant.

Changes to the existing office building would include demolition of the north-facing entry on its north façade, the northerly extension of the east wing, the exposed concrete piers along with the circular garage ramp structures, and the whole south wing. Demolition of the building’s east wing and whole south wing would alter the building’s historic footprint. Other changes would include replacement of the glass curtain and painted aluminum window wall system with a compatible residential-based design; removal of the rooftop mechanical equipment rooms; construction of a vertical addition; and additional structural support to accommodate the increased load from the two-story addition. The stepped, two-story vertical addition would be set back 15 feet from the east, west and south sides of the building, and the second story would be set back an additional 45 feet and 120 feet, respectively, from the east and west sides. Overall, the vertical addition would increase the height of the existing office building (from about 56 feet to 80 feet); however, when viewed from the street level (looking north and west to the project site from Euclid, Masonic, and Presidio avenues, or Pine Street) the vertical addition would appear visually subordinate to the historic portion of the office building.

Summary of Ability to Meet Secretary of Interior's Standards for Rehabilitation

CEQA Guidelines section 15064.5(b)(3) includes a presumption that a project that conforms with the Secretary's Standards would generally have a less-than-significant impact on a historical resource. As described above, Alternative E would retain some of the existing office building's character-defining features but most of the character-defining features of the site and landscape would be demolished/removed. The relevant rehabilitation standards are discussed below with a short explanation regarding the alternative's ability to meet the standard.

Rehabilitation Standard 1 states that the "property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces and spatial relationships." As described above, under Alternative E the historic office use would be discontinued and changes to the building would include the removal of a portion of the east wing and its whole south wing and replacement of the window wall system with a compatible residential-based design. Additionally, new buildings with residential, retail, and daycare uses would be introduced on the northern, western, and southern portions of the site along California and Laurel streets and Euclid Avenue resulting in changes to the site's open areas that create the corporate campus environment. These changes, and the resultant effect on the distinctive materials, features, spaces, and spatial relationships of the building, site, and landscape features, would be beyond the minimal changes acceptable under Standard 1. Thus, when considered together, the changes to the building, site and landscape features would not conform with Standard 1.

Rehabilitation Standard 2 states that the "historic character of a property shall be retained and preserved," and "removal of historic materials or alteration of features and spaces that characterize a property shall be avoided." Rehabilitation Standard 5 states that "distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a historic property shall be preserved." Under Alternative E the modifications to the existing building would include the replacement of the window wall system with a compatible residential-based design and changes to the building's historic footprint through removal of a portion of the east wing and the whole south wing. Changes to the building would be substantial in that close to 50 percent of the building would be removed. The size and setbacks of the rooftop addition would be spatially differentiated from the historic façade to preserve the horizontal massing and scale of the building, and would have a contemporary design that would distinguish it from the original building while steel and glazing materials would make it compatible with the original building. Although Alternative E would preserve some of the character-defining features of the existing office building, e.g., the Midcentury Modern architectural style with little ornamentation and the flat cantilevered roof with projecting eaves, other historic features would be compromised by the proposed changes and new development, e.g., the stepped multi-story massing built into the natural topography of the site and the building's three distinctive phases of construction. New infill construction would result in the demolition/removal of most of the curvilinear shapes in pathways, driveways, and planting areas; integrated landscape features such as planter boxes and seating; brick perimeter walls; and the concrete pergola atop a terraced open area facing Laurel Street as well as the removal of mature trees. Thus, when considered together the changes to the building, site, and landscape features would not fully conform with Standards 2 and 5.

Rehabilitation Standard 9 states that "new additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property," and "new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property." Under Alternative E, as described above, the size, scale, materials, and design of the exterior alterations including the new rooftop addition would distinguish it from the original building yet be compatible with Midcentury Modern design principles. Demolition would change the building's footprint, substantially altering the building's general form and massing. As stated above, new infill construction would demolish/remove most of the curvilinear shapes and hardscape features of the site and landscape on the northern, western, and southern portions of the property. Thus, when considered together the changes to the building, site, and landscape features would not fully conform with Standard 9.

Rehabilitation Standard 10 states that "new additions and adjacent or related new construction shall be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired." Under Alternative E, the demolition of the northeast and south portions of the building would represent an irreversible change to the essential form and integrity of the building, but the rooftop addition would not. Thus, when considered together with new construction, which would remove most of the character-defining features of the site and landscape, the essential form and integrity of the Midcentury Modern designed corporate campus and its environment would not be able to be restored to its previous state even if new buildings and the rooftop addition were to be removed in the future. Thus, Alternative E would not conform with Standard 10.

Conclusion

Alternative E would include the construction of 12 new buildings on the northern, western, and southern portions of the project site (one less than the proposed project and project variant). As with the proposed project and project variant, redevelopment of the northern, western and southern portions of the site under Alternative E would remove most of the project site's character-defining site and landscape features that, together with the existing office building, convey the open park-like corporate campus setting. The majority of the southeast-facing courtyard would be retained and reconstructed along with the landscape, brick retaining walls, the green lawn stretching toward Presidio Avenue, and parts of the formal landscape and mature trees, unlike the proposed project or project variant. Thus, the most prominent views of the project site, from the east on Pine Street (looking west) and from the south on Masonic Avenue (looking north) toward the terraced southeastern slope and existing building with the stepped, two-story rooftop addition, would be altered with the development of the Euclid Building.

Under Alternative E, as with the proposed project and project variant, most of the site (except for part of the southeastern portion) would be redeveloped and altered from an open, landscaped corporate campus to a densely developed mixed-use site with residential, retail and daycare uses. With the introduction of 12 new buildings (eight along Laurel Street, three along California Street, and one along Euclid Avenue) under Alternative E most of the character-defining site and landscape features along the northern, western and southern portions of the site would be demolished/removed. New construction combined with changes to the existing office building would, like the proposed project and project variant, result in material changes to the distinctive materials, features, spaces and spatial relationships of the property. Development of the 12 new buildings would also alter and/or obscure existing views of character-defining features of the site and building when viewed from the west, the south, and the east.

The loss of these character-defining features on the northern, western, and southern portions of the project site, in tandem with the construction of 12 new buildings, would result in a material change to the site features and the spatial relationships that characterize the property. The changes to the building and changes to site and landscape features on the northern and western portions of the project site that do not exhibit the most distinctive features and spatial relationships would be the same as the proposed project and project variant. The changes on the southern and eastern portions of the site, where the existing building's stepped, multi-story massing is integrated with the site's topography, open spaces with private courtyards, terraced landscaping, and mature trees, and the green lawn extending east along Euclid Avenue that represents the best example of the integration of the character-defining features of the property, would be altered under Alternative E, but not as extensively as with the proposed project and project variant.

New construction and changes to the existing office building would result in substantial changes to the distinctive materials, features, spaces and spatial relationships on the northern, western, and southern portions of the property. Although the retention and adaptive reuse of a portion of the existing office building under Alternative E would avoid the physical loss of the office building, the removal of character-defining site and landscape features, in combination with the construction of 12 new buildings along California Street, Laurel Street, and Euclid Avenue, would be substantial enough to hinder the site's ability to convey its historically open feel such that the property could no longer convey its historic and architectural significance as a Midcentury Modern-design corporate campus.

Although Alternative E would reduce the impact on the historic architectural resource compared to the proposed project or project variant, the extent of the alterations to the character-defining building, site, and landscape features would, on balance, materially alter the physical characteristics of 3333 California Street that convey its historic significance and that justify its inclusion in the California Register. As such, Alternative E would reduce the magnitude of the impact compared to the proposed project and project variant, but not to a less-than-significant level, and the substantial adverse impact on the historic resource at 3333 California Street would remain. For this reason, as with the proposed project or project variant, under Alternative E implementation of Mitigation Measure M CR-1a: Documentation of Historical Resource and Mitigation Measure M-CR-1b: Interpretation of the Historical Resource (see pp. 4.B.45-4.B.46) would be required. Implementation of these mitigation measures would reduce the significant impact of Alternative E, but not to a less-than-significant level.

Off-Site Historic Resources: For the same reasons as the proposed project and project variant, Alternative E would have a less-than-significant impact on off-site historic architectural resources.

Cumulative Impacts: For the same reasons as the proposed project and project variant, Alternative E in combination with other cumulative development in the vicinity would not result in a significant cumulative impact on historical architectural resources.

TRANSPORTATION AND CIRCULATION

Trip Generation

The travel demand for Alternative E was estimated for weekday daily and weekday a.m. and p.m. peak hours. A summary of the external vehicle trips generated under Alternative E is shown in Table 6.11: Alternative E Vehicle-Trip Generation Comparison – External Trips.

As shown in Table 6.2**,** p. 6.16, Alternative E would generate 1,486 external person-trips during the weekday a.m. peak hour: 933 auto person-trips (or 539 vehicle trips), 245 transit trips, 272 walk trips, and 36 trips by other modes. During the weekday p.m. peak hour, Alternative E would generate 1,794 external person-trips: 1,120 auto person-trips (or 649 vehicle trips), 292 transit trips, 332 walk trips, and 50 trips by other modes.

As shown in Table 6.11, Alternative E would generate 152 (22 percent) and 103 (14 percent) fewer vehicle trips than the proposed project during the weekday a.m. and p.m. peak periods, respectively. This alternative would generate 187 (26 percent) and 155 (19 percent) fewer vehicle trips than the project variant during the weekday a.m. and p.m. peak periods, respectively. Because of its incrementally reduced land use program compared to the proposed project or project variant (different mix of residential unit types, slightly less retail and no office), Alternative E would result in a range of about 14 percent fewer vehicle trips compared to the proposed project and 26 percent fewer vehicle trips than the project variant during the weekday a.m. and p.m. peak periods. As a result, Alternative E would result in slightly reduced operational effects compared to those described for the proposed project or project variant.

Table 6.11: Alternative E Vehicle-Trip Generation Comparison – External Trips

	Daily [NOTE A]	Weekday AM Peak Hour	Weekday PM Peak Hour
Alternative E	4,287	539	649
Proposed Project	5,760	691	752
Difference [NOTE B]	-1,473 or 25.6% reduction	-152 or 22% reduction	-103 or 13.7% reduction
Alternative E	4,287	539	649
Project Variant	5,744	726	804
Difference [NOTE B]	-1,457 or 25.4% reduction	-187 or 25.8% reduction	-155 or 19.3% reduction

Notes:

[A] The weekday AM peak hour internal trip rate was applied to the daily person-trips to estimate the number of external vehicle trips.

[B] Total reflects external vehicle trips.

Source: *SF Guidelines*, 2002; Kittelson & Associates, Inc, 2018; *3333 California Travel Demand Memo*, March 2018

Construction Transportation

Construction-related activities would take approximately 6.5 years rather than 7 to 15 years expected for the proposed project or project variant. As with the proposed project or project variant, Alternative E would be constructed in four phases. Alternative E would have incrementally reduced construction effects compared to the proposed project and project variant and result in a less-than-significant construction-related transportation impact. As with the proposed project or project variant, Improvement Measure I-TR-1: Project Construction Updates, p. 4.C.74, would further reduce the less-than-significant impact.

Operational Transportation Impacts

VMT Impacts

The average daily vehicle miles traveled per capita or per employee for uses in Alternative E would be the same as under the proposed project or project variant. The existing average daily VMT per capita for residential uses, and per employee for retail and office uses are more than 15 percent below the existing and future regional averages for the project site's location. The analysis also compares parking rates for Alternative E uses to the neighborhood parking rates for those uses, using the same methodology as for the proposed project, project variant, and other alternatives, as summarized for Alternative B on p. 6.44. The residential parking rate accounts for residential units in the transportation analysis zone (TAZ) 709 and other nearby TAZs (within three-quarters of a mile based on walking distance) with more distant land use and parking given decreasing weight. The retail parking rate accounts for parking associated with retail uses along California and Sacramento streets near the project site. This information is presented in Table 6.12: Parking Rate Summary for Alternative E.

Table 6.12: Parking Rate Summary for Alternative E

Scenario / Land Use	Size	Vehicle Parking Spaces	Existing Neighborhood Parking Rate	Proposed Parking Rate	Change from Existing
Alternative E					
Residential	588 units	588	0.90	1.00	11%
Retail	44,306 gross square feet	175	1.55	3.95	155%
Other Non-residential	14,650 gross square feet	29	1.44	1.98	37%
Proposed Project					
Residential	558 units	558	0.90	1.00	11%
Retail	54,117 gross square feet	198	1.55	3.66	136%
Other Non-residential	64,689 gross square feet	129	1.44	1.99	38%
Project Variant					
Residential	744 units	744	0.90	1.00	11%
Retail	48,593 gross square feet	188	1.55	3.87	150%
Other Non-residential	14,650 gross square feet	29	1.44	1.98	37%

Notes: The existing parking rate for residential uses reflects data for TAZ 709. The existing parking rate for retail and other non-residential uses reflects data from California Street and Sacramento Street, as provided by the planning department. The retail land use category for the proposed project and project variant includes the proposed 60 public parking (commercial) spaces on the project site. Car-share spaces are not included in the parking rate calculation.
Neighborhood Parking Rates:
Residential Parking Rate = 0.9 space/unit (neighborhood)
Retail Rate = 1.55/ 1,000 square feet (California and Sacramento)
Other Non-Residential Rate = 1.44/ 1,000 square feet (existing site)

Source: Kittelson and Associates, Inc. 2018; San Francisco Planning Department, 2018.

As shown in Table 6.12, Alternative E would provide parking for residential uses at the same rate as under the proposed project and project variant. It would provide 175 parking spaces (3.95 spaces per 1,000 square feet) for the retail uses and 29 spaces (1.98 spaces per 1,000 square feet) for the other non-residential use (daycare center). Alternative E would provide retail parking at a higher rate per square footage of retail space than the proposed project or project variant, and other non-residential parking at about the same rate as the proposed project or project variant.

The increase in VMT per employee associated with provision of retail parking spaces may increase VMT per employee enough to exceed the threshold of 15 percent below regional average for the retail use. As with the proposed project and project variant, Mitigation Measure M-TR-2: Reduce Retail Parking Supply, p. 4.C.80, would be applicable to Alternative E and would reduce the impact to less-than-significant levels.

Traffic Hazard Impacts

As discussed above, Alternative E would result in between 14 and 26 percent fewer vehicle trips compared to the proposed project and project variant during the weekday a.m. and p.m. peak hours. Only one of the two curb cuts on Masonic Avenue between Euclid and Presidio avenues would be constructed. Unlike the proposed project or project variant, one new curb cut on Euclid Avenue would be constructed to provide access to the Euclid Garage. Vehicles accessing the Euclid Garage (68 spaces) would enter/exit from Euclid Avenue. While the introduction of a new curb cut and driveway along Euclid Avenue would increase the number of conflict locations compared with the proposed project and project variant, the number of vehicle trips at this location would be low. During the weekday a.m. peak hour, a total of 6 vehicles would exit and 18 vehicles would enter the Euclid Garage. During the weekday p.m. peak hour, a total of 21 vehicles would enter and 7 vehicles would exit the Euclid Garage. Furthermore, there would be space within the garage, on the approximately 100-foot-long driveway ramp, for up to four vehicles to queue. As such, potential for queues to spill back across the sidewalk or westbound travel lane would be minimized and vehicles accessing these driveways would not create traffic hazards or impede movement of vehicles traveling along Euclid Avenue. Thus, due to its incrementally reduced land use program, Alternative E would result in slightly reduced operational effects than those described for the proposed project and project variant because there would be fewer vehicles on the affected streets. Although Alternative E would have a slightly different circulation program compared to the proposed project or project variant, traffic hazard impacts would be less than significant as with the proposed project and project variant. Implementation of Improvement Measure I-TR-3: Driveway Queue Abatement, p. 4.C.82, would further reduce the less-than-significant traffic hazard impacts associated with the new curb cuts and project driveways.

Transit Impacts

As shown in Table 6.2**,** p. 6.16, Alternative E would generate 245 transit trips in the a.m. peak hour and 292 transit trips in the p.m. peak hour. During the weekday a.m. and p.m. peak periods Alternative E would generate 17 percent and 12 percent fewer transit trips than the proposed project, and 24 percent and 26 percent fewer transit trips than the project variant.

Alternative E would add 11 riders to the 43 Masonic bus route and, as with the proposed project and project variant, would result in adverse impacts by increasing ridership to exceed the 85 percent capacity utilization during the weekday a.m. peak hour under baseline conditions. Therefore, as with the proposed project and project variant, Alternative E would have a significant impact on an individual Muni line and mitigation would be required. Implementation of Mitigation Measure M-TR-4: Monitor and Provide Fair Share Contribution to Improve 43 Masonic Capacity, pp. 4.C.87-4.C.88, would reduce the impact to less-than-significant levels.

Under Alternative E a fair share contribution of $146,063[24] would be conveyed to the SFMTA when monitoring, funded by the project sponsor beginning when the first development phase is completed and occupied, shows that capacity utilization has exceeded 85 percent. Similar to the proposed project or project variant, the SFMTA's ability to provide additional capacity or improve transit headways is uncertain; thus, the impact would remain significant and unavoidable after mitigation.

Since the number of peak hour regional transit trips would be lower for Alternative E compared to the proposed project and project variant, Alternative E would have a less-than-significant impact on regional transit routes.

Pedestrian Impacts

As with the proposed project or project variant, Alternative E would include widening of adjacent sidewalks; the introduction, elimination, and relocation of curb cuts; and the construction of corner bulbouts (to shorten crossing distances). However, one less curb cut would be introduced along Masonic Avenue and one new curb cut would be introduced on Euclid Avenue between Laurel Street and Masonic Avenue. Under Alternative E, the east-west running Mayfair Walk would be constructed; however, the north-south running Walnut Walk would not. As with the proposed project and project variant, the streetscape change at the intersection of Presidio Avenue/Masonic Avenue/Pine Street (Pine Street Steps and Plaza) would be implemented. However, the changes at the intersection of Masonic and Euclid avenues (Corner Plaza) would not. The pedestrian-related features of Alternative E would represent an improvement over existing conditions with respect to accessibility as it would include east-west connections across the project site for pedestrians that do not currently exist.

Under Alternative E, pedestrians would be able to walk onto the project site from California and Walnut streets, Mayfair Drive, and Presidio Avenue/Masonic Avenue/Pine Street. However, without Walnut Walk the site would not be fully integrated with the existing street grid and pedestrians would not be able to travel through the site to Masonic and Euclid avenues as under the proposed project and project variant. Thus, compared to the proposed project and project variant, pedestrian access to the site and circulation through the site would not be as complete under Alternative E, which would have fewer access points.

As shown in Table 6.2**,** p. 6.16, Alternative E would generate 517 pedestrian trips (272 walk trips and 245 transit trips) during the weekday a.m. peak hour and 624 pedestrian trips (332 walk trips and 292 transit trips) during the weekday p.m. peak hour. Alternative E would generate 154 (23 percent) and 104 (14 percent) fewer pedestrian trips than the proposed project during the

[24] See EIR Appendix G: Alternatives Analysis – Transportation and Circulation, Attachment A, Transit Capacity Analysis and Fair Share Contribution Calculations, p. 104.

weekday a.m. and p.m. peak periods, respectively. Alternative E would generate 166 (24 percent) and 155 (20 percent) fewer pedestrian trips than the project variant during the weekday a.m. and p.m. peak periods, respectively. Thus, with fewer pedestrian trips than the proposed project and project variant, Alternative E also would not result in overcrowding on public sidewalks.

Alternative E would generate fewer vehicle trips and fewer pedestrian trips than the proposed project and project variant; thus, this alternative would not substantially alter traffic operations or create potentially hazardous conditions or accessibility impacts for pedestrians. As with the proposed project and project variant, the curb cuts and project driveways as well as the streetscape changes would not create hazardous conditions or accessibility impacts on pedestrians. Thus, pedestrian impacts under Alternative E would remain less than significant. Similarly, implementation of Improvement Measure I-TR-3: Driveway Queue Abatement, p. 4.C.82, would further reduce the less-than-significant pedestrian impacts.

Bicycle Impacts

Under Alternative E, unlike the proposed project or project variant, one curb cut would be added on Euclid Avenue to provide access to the Euclid Garage, and only one of the two curb cuts on Masonic Avenue between Euclid and Presidio avenues would be constructed. Overall, the number of driveway conflicts points would be the same as under the proposed project and project variant; however, unlike the proposed project or project variant, vehicles would cross the class II (westbound) bicycle lane on the north side of Euclid Avenue to enter/exit the Euclid Garage. In all other respects, streetscape changes such as curb cuts and corner bulbouts would be similar to those under the proposed project and project variant except for the development of Corner Plaza at Masonic and Euclid avenues.

Alternative E would generate fewer vehicle trips than the proposed project and project variant. As a result, changes in local traffic operations would not be as substantial as those under the proposed project or project variant. While the introduction of a new curb cut and site access driveway along Euclid Avenue would increase the number of bicycle conflict locations compared with the proposed project and project variant, the number of vehicle trips at this curb cut would be low (less than two vehicle trips entering/exiting per minute during the weekday a.m. or p.m. peak hour) and there would be space within the garage, on the approximately 100-foot-long driveway ramp, for up to four vehicles to queue. As such, potential for queues to develop and spillback across the sidewalk and block the westbound bicycle lane or create hazardous conditions or accessibility impacts for bicyclists would be minimized. Furthermore, given the low volume of bicyclists traveling on Euclid Avenue (less than 5 bicyclists observed during the peak hour) the probability of a conflict is low. Thus, under Alternative E, as with the proposed project and project variant, the curb cuts and project driveways would not create hazardous conditions for bicyclists.

As with the proposed project and project variant, bicycle impacts associated with project-related hazardous conditions or interference with bicycle access to the site or adjoining areas would be less than significant. Similarly, implementation of Improvement Measure I-TR-3: Driveway Queue Abatement, p. 4.C.82, would further reduce the less-than-significant bicycle impacts.

Loading Impacts

FREIGHT LOADING

Alternative E would generate an average and peak hour demand of four and five freight loading spaces, respectively, one less than the proposed project or project variant. Under Alternative E there would be five (not six) off-street commercial and residential freight loading spaces and one 100-foot-long on-street commercial loading zone would be requested. As with the proposed project and project variant, the proposed supply would meet demand and the freight loading impact would be less than significant. Similarly, implementation of Improvement Measure I-TR-9a: Schedule and Coordinate Deliveries and Improvement Measure I-TR-9b: Monitor Loading Activity and Implement Loading Management Strategies as Needed, pp. 4.C.97-4.C.98, would further reduce the less-than-significant freight loading impacts.

PASSENGER LOADING

Alternative E would generate 36 passenger drop-off/pick-up trips (16 drop-off, 20 pick-up) during the weekday a.m. peak period and 50 passenger drop-off/pick-up trips (28 drop-off, 22 pick-up) during the weekday p.m. peak period. This demand is equivalent to 60 linear feet (or 3 parking spaces) during the peak hour of demand. The project sponsor would seek the conversion of six on-street parking spaces into two separate 60-foot-long passenger loading zones along Euclid Avenue and Laurel Street. Passenger loading would also occur within Basement Level B3 of the California Street Garage (associated with the daycare) and at the roundabout at the terminus of the Walnut Street extension, as with the proposed project and project variant. The passenger loading supply would meet demand and the passenger loading impact would continue to be less than significant.

Emergency Access Impacts

Emergency vehicles would continue to have access to the perimeter of the project site and would be able to access the center of the site via the Walnut Street extension and the west end of Mayfair Walk. As with the proposed project and project variant, emergency access impacts would be less than significant.

Cumulative Impacts

As with the proposed project and project variant, Alternative E, in combination with past, present and reasonably foreseeable development in the project vicinity, would result in a less-than-significant cumulative construction-related transportation impact and less-than-significant 2040 cumulative impacts related to traffic hazards, transit, pedestrians, bicycles, loading, and emergency access.

Implementation of Mitigation Measure M-TR-2: Reduce Retail Parking Supply, p. 4.C.80, would reduce the proposed retail parking supply to a level that would not substantially increase VMT, resulting in a less-than-significant cumulative VMT impact. Therefore, like the proposed project and project variant, Alternative E with mitigation would not make a considerable contribution to cumulative increases in VMT because it would be below the planning department's cumulative threshold of 15 percent below the regional average.

NOISE AND VIBRATION

Compared to the proposed project and project variant, under Alternative E there would be a similar amount of demolition, construction, and ground disturbance on the northern, eastern, and western portions of the project site along California Street, Presidio Avenue, and Laurel Street; more limited construction activity on the southern portion of the project site fronting Euclid Avenue; and no change to existing conditions along Masonic Avenue beyond improvements to the existing office building and its exterior as part of its adaptive reuse as a residential building (see Figure 6.12, p. 6.139, and Figure 2.22, p. 2.62).

Construction Noise

Under Alternative E, the construction program would be slightly shorter (6.5 years) than that for the proposed project or project variant and would be completed in the same number of phases. The type of construction equipment and use characteristics would not change because although durations would be slightly more limited, the same types of demolition, excavation, and construction activities would still occur, generating noise increases of 10 dBA or more over ambient levels at off-site locations (see Impact NO-1, pp. 4.D.36-4.D.46). Therefore, construction noise impacts from these activities would remain significant and unavoidable.

Overlapping construction phases would continue to result in the occupancy of new and/or renovated buildings from previous phases by future residents. Although exposure of on-site sensitive receptors to construction noise would be slightly more limited under Alternative E compared to the proposed project or project variant, the impact would remain significant and unavoidable.

As with the proposed project or project variant, implementation of Mitigation Measure M-NO-1: Construction Noise Control Measures (see pp. 4.D.42-4.D.43) would be required to address noise impacts at off-site and on-site receptors. Although significant noise impacts would occur over a slightly shorter duration, impacts at sensitive receptor locations under Alternative E would remain significant and unavoidable with implementation of the mitigation measure. Implementation of this mitigation measure under Alternative E, as with the proposed project or project variant, would ensure that construction noise from use of non-impact equipment would comply with local standards for construction noise.

With a slightly more limited construction program and construction schedule, there would be incrementally less excavated material hauled off-site, less concrete used, and less material delivered to the site resulting in slightly fewer haul/concrete/delivery truck trips under Alternative E than the proposed project or project variant. The incremental change in the number of construction truck trips would not be substantial and, like the proposed project or project variant, noise from construction truck traffic would be a less-than-significant impact.

Construction Vibration

Under Alternative E, as with the proposed project or project variant, construction activities that generate groundborne vibration would occur, e.g., the use of excavators and vibratory rollers, and the potential for structural damage to adjacent structures would remain. Thus, under Alternative E, as with the proposed project or project variant, construction-related groundborne vibration impacts on the adjacent SF Fire Credit Union building would also be significant and implementation of Mitigation Measure M-NO-2: Vibration Monitoring Program for SF Fire Credit Union Building (see pp. 4.D.55-4.D.56) would be required. With implementation of Mitigation Measure M-NO-2, the significant impact on the SF Fire Credit Union under Alternative E would be reduced to a less-than-significant level, as with the proposed project or project variant.

Operational Noise

Stationary Equipment

Under Alternative E, the emergency diesel generator that serves the existing office building would be relocated within the retained parking garage under the existing building and would not result in a significant noise impact. HVAC equipment for the Mayfair, Plaza A, Plaza B, Walnut, and Euclid buildings as well as the Laurel Duplexes would be located on the rooftops. As with the proposed project or project variant, Mitigation Measure M-NO-3: Stationary Equipment Noise Controls (see p. 4.D.60) would still be required under Alternative E for rooftop equipment to ensure that proper enclosures or other sound muffling measures would be implemented to meet regulatory requirements established in the Noise Ordinance. Therefore, like the proposed project or project variant, with mitigation this impact would be reduced to a less-than-significant level.

Traffic

As shown in Table 6.11, p. 6.152, Alternative E would generate 1,473 fewer vehicle trips per weekday than the proposed project and 1,457 fewer vehicle trips per weekday than the project variant (an approximately 26 percent reduction relative to the proposed project's or project variant's vehicle trips). Under the proposed project or project variant traffic noise increases of 1 dBA or less were identified, and the impact was determined to be less than significant (see Impact NO-4, pp. 4.D.62-4.D.64). With less traffic generated under Alternative E, any incremental increase in traffic noise along affected streets would also be less than significant.

Land Use Compatibility

Like the proposed project or project variant, Alternative E would result in the introduction of new residential land uses along California and Laurel streets and Euclid Avenue, but with one less new residential building developed along the perimeter of the site on Masonic Avenue. Alternative E would have less-than-significant noise compatibility impacts related to future noise levels similar to those identified for the proposed project or project variant (see Impact NO-5, pp. 4.D.64-4.D.67).

Cumulative Impacts

Construction-related cumulative noise and vibration impacts under Alternative E would be similar to those of the proposed project or project variant in combination with noise from construction of other nearby projects expected during the buildout period for the alternative, and would continue to be less than significant (see Impact C-NO-1, pp. 4.D.68-4.D.70). Under 2040 cumulative conditions with the proposed project or project variant, a traffic noise increase of 2 dBA or less was identified, resulting in a less-than-significant cumulative noise impact (see Impact C-NO-2, pp. 4.D.71-4.D.72). Alternative E would result in substantially fewer vehicle trips than the proposed project or project variant. Therefore, cumulative noise impacts with operation of Alternative E would remain less than significant.

AIR QUALITY

Under Alternative E, there would be slightly less demolition, less construction, and less ground disturbance than under the proposed project or project variant. Along the northern and western portions of the project site, demolition, construction, and ground disturbance would be similar to that under the proposed project or project variant.

Alternative E would be a reduction in the total gross square feet of floor area compared to the proposed project or project variant (approximately 8 and 14 percent less, respectively). Construction would be completed in 6.5 years (a slightly shorter period than the proposed project or project variant) in the same number of overlapping phases. Thus, there would be on-site sensitive receptors during construction of later phases.

As with the proposed project or project variant, under Alternative E the emergency diesel generator and electrical substations, and the boilers, chillers and other equipment in the annex building would be removed as part of the demolition of the circular garage ramp structures and annex building. The emergency diesel generator would be replaced with a similarly sized generator in a new location in the retained parking garage under the adaptively reused building. New emergency generators would not be sited at any other locations on the project site.

Criteria Air Pollutants

Construction

As described under Impact AQ-1, pp. 4.E.47-4.E.49, estimated construction-related emissions for criteria air pollutants for the proposed project or project variant would not exceed the applicable construction-related significance thresholds for reactive organic gases (ROG), nitrogen oxides (NOx), and particulate matter (PM). Under the slightly more limited construction program of Alternative E and a similar construction schedule, the average daily construction-related criteria air pollutant emissions would be similar to or lower than the proposed project or project variant, and would also be a less-than-significant impact.[25]

Operations

As described under Impact AQ-2, pp. 4.E.49-4.E.52, the air quality impacts associated with estimated operational emissions for criteria air pollutants for the proposed project or project variant would not exceed the applicable significance thresholds for ROG, NOx and PM. With the slightly reduced land use program under Alternative E there would be fewer area, stationary, and building energy sources of emissions, and, consequently, lower operational emissions compared to the proposed project or project variant. Alternative E would also generate 1,473 to 1,457 fewer daily vehicle trips, as shown in Table 6.11, p. 6.152, about a 26 percent reduction, and thus lower mobile emissions. As a result, the average daily criteria air pollutant emissions attributable to project operations under Alternative E would be reduced in comparison to the proposed project or project variant, and, like the proposed project or project variant, would remain less than significant.

Toxic Air Contaminants

Similar to the proposed project or project variant, construction and operation of Alternative E would generate toxic air contaminants, including diesel particulate matter. Under Alternative E, a new (but similarly sized) emergency diesel generator would replace the existing one in the easternmost circular garage ramp structure in Basement Level B1, rather than a larger version as under the proposed project or project variant. As noted above, Alternative E would generate

[25] This was determined by dividing the new gross square feet of construction for Alternative E (total gross square feet minus existing gross square feet) by the number of years of construction (6.5) and comparing this to the same ratio for the proposed project and project variant. This assumes construction emissions are directly proportional to new gross square footage.

approximately 26 percent fewer vehicle trips than the proposed project or project variant. Thus, under the reduced construction and land use programs of Alternative E, less construction and operational $PM_{2.5}$ and diesel particulate matter emissions would be generated than under the proposed project or project variant.

As with the proposed project or project variant, project contributions under Alternative E, when added to background values, would not result in a significant health impact at the maximally exposed off-site and on-site individual receptors.[26] Because the generator would be in a different location under this alternative compared to the proposed project and project variant, and construction activities would also be in different locations, the location of the maximally exposed individual sensitive receptors would likely change. As with the proposed project or project variant, annual average $PM_{2.5}$ contributions would be almost all from background, and excess cancer risk values would be well below thresholds (see Table 4.E.10, p. 4.E.58). Therefore, toxic air contaminant emissions attributable to project construction and operations under Alternative E would be similar to, or slightly reduced, in comparison to the proposed project or project variant, and would not result in off- or on-site sensitive receptor locations meeting the Air Pollutant Exposure Zone criteria for annual average $PM_{2.5}$ concentrations. Excess cancer risk would continue to be less than significant.

Consistency with Clean Air Plan

As with the proposed project, project variant, the full preservation alternatives, and Alternative D (see Impact AQ-4, pp. 4.E.60-4.E.65), Alternative E would support the primary goals of the *2017 Bay Area Clean Air Plan.* Alternative E would implement all applicable control measures; would develop a transportation demand management program to promote the use of transit, walking and bicycling as viable options to privately owned vehicles; would pay a fair share contribution to the SFMTA to improve local bus service (see Mitigation Measure M-TR-4, pp. 4.C.87-4.C.88); and would include car-share parking, unbundled parking, and electric vehicle charging stations. Therefore, Alternative E would not conflict with, or obstruct implementation of the *2017 Bay Area Clean Air Plan*, and this impact, as with the proposed project or project variant, would be less than significant.

Odors

Although there may be some potential for small-scale, localized odor issues around the construction site or the proposed site uses under Alternative E, e.g., from construction site activities and solid waste collection, substantial odor sources and consequent effects on sensitive

[26] This was determined by quantitatively comparing the exposure parameters for the decreased construction duration and the ratio of construction emissions assumed based on the total gross square footage.

receptors would be unlikely. Therefore, like the proposed project or project variant, Alternative E would not create objectionable odors that would affect a substantial number of people.

Cumulative Air Quality Impacts

As explained for the proposed project and project variant (see Impact C-AQ-1, p. 4.E.66), the contribution of a project's individual air pollutant emissions to regional air quality impacts is, by its nature, a cumulative effect. Alternative E would generate approximately 26 percent fewer vehicle trips, would replace the emergency diesel generator for the existing office building with a new similarly sized emergency diesel generator, and would not require emergency diesel generators for any new buildings. Therefore, the alternative would result in a slightly reduced contribution to any cumulative criteria pollutant emissions or health risk impact compared to the proposed project or project variant, which were determined to be less than significant. Therefore, the health risks associated with Alternative E, in combination with other present or reasonably foreseeable future projects would not exceed thresholds and result in the expansion of the mapped Air Pollutant Exposure Zone. Thus, under Alternative E, as with the proposed project or project variant, cumulative construction and operational related air quality impacts would be less than significant, and mitigation would not be needed.

INITIAL STUDY TOPICS

Land Use and Planning

Alternative E would be a new mixed-use development within an existing city block. The east-west Mayfair Walk would be constructed but the north-south Walnut Walk would not be. Without Walnut Walk, Alternative E would provide less integration with the surrounding neighborhood than the proposed project or project variant. In all other respects, Alternative E would have the same less-than-significant project-level land use impacts as the proposed project and project variant (see Topic E.1, Land Use and Planning, of the initial study, pp. 110-112), and would not combine with other cumulative land uses changes to generate a significant cumulative land use and land use planning impact.

Population and Housing

Alternative E would have 30 more residential units and increase the residential population on the project site by approximately 68 persons compared to the proposed project, and would have 156 fewer residential units and decrease the residential population by 352 compared to the project variant. Alternative E would be similar to the proposed project's mix of uses except that there would be no office-related employment, like the project variant. Thus, employment would be less than that of the proposed project because the alternative would not include office uses, and less than that of the project variant because there would be 156 fewer residential units. Overall, the land use program and the total square footage of uses would be slightly smaller than with the proposed project or project variant.

Like the proposed project or project variant, which would have less-than-significant population and housing impacts as described in Topic E.2, Population and Housing, of the initial study (pp. 112-120), this alternative, with a similar land use program, would not induce substantial population growth, would not generate a substantial increase in employment-related housing demand, and would not displace any existing housing units. As such, Alternative E would have less-than-significant project-level impacts and would not combine with other cumulative projects in the vicinity and at the citywide level to generate a significant cumulative impact related to population and housing.

Cultural Resources - Archaeological Resources

Alternative E would have substantially the same project-level and cumulative impacts on archaeological resources (including human remains and tribal cultural resources) as those identified for the proposed project or project variant because excavation would occur in areas of high sensitivity and the amount of excavation and site disturbance would be roughly similar. The mitigation measures identified in the initial study on pp. 129-133 and p. 135 would continue to apply and would reduce the project-level impact to a less-than-significant level, as with the proposed project and project variant, and would reduce its contribution to the identified significant cumulative impact related to subsurface archaeological resources associated with the Laurel Hill Cemetery to less than considerable.

Greenhouse Gas Emissions

Alternative E would include approximately 8 percent less floor area than the proposed project and 14 percent less than the project variant; the construction program and development footprint would be smaller than the proposed project or project variant; and more of the existing building would be retained. Therefore, this alternative would result in fewer construction and operation-related greenhouse gas emissions compared to the proposed project and project variant. Compliance with applicable regulations would ensure that Alternative E would be consistent with the City's GHG Reduction Strategy as well as regional and state plans and policies related to GHG emissions reduction efforts (see Topic E.7, Greenhouse Gas Emission, of the initial study, pp. 146-150.) Alternative E would generate approximately 14 to 26 percent fewer vehicle trips than the proposed project or project variant. Thus, operational-related GHG emissions from mobile sources would be similar to or less than mobile source emissions from the proposed project or project variant. As with the proposed project or project variant, cumulative impacts related to GHG emissions would be less than significant.

Wind and Shadow

Under Alternative E, the building footprints and heights of the new buildings along California and Laurel streets would be the same as for the project variant. The Euclid Building would be developed at the same height as in the proposed project and project variant, but would have a smaller footprint. The retained existing building at center of site would be shorter than under the proposed project or project variant.

Wind

Under Alternative E, wind conditions along the public sidewalks on California and Laurel streets would be similar to conditions with the proposed project or project variant. Wind conditions at all other locations (public sidewalks on Euclid, Masonic, and Presidio avenues) would be similar to existing conditions because the Euclid Building would be located at the center of the site and the Masonic Building on the east portion of the project site would not be constructed. Thus, due to the slightly reduced building program, any changes to wind speeds on adjacent public sidewalks and public use areas attributable to Alternative E, like those attributable to the proposed project or project variant, would not be substantial enough to contribute to an exceedance of the wind hazard criterion. Therefore, as with the proposed project and project variant, wind impacts under Alternative E would remain less than significant and would not combine with cumulative projects in the vicinity of the project site to generate a significant cumulative wind impact.

Shadow

Under Alternative E, building height at the center of the site would be approximately 12 feet lower than under the proposed project and project variant (reduced from 92 feet to 80 feet) and therefore would cast shorter shadow than the proposed project or project variant and would not shade public open space. Shadow cast on public sidewalks would not be as extensive because the Masonic building would not be constructed and the Euclid Building would be set back further from the sidewalk. Therefore, as with the proposed project or project variant, shadow impacts under Alternative E would be less than significant and would not combine with cumulative projects in the vicinity of the project site to create a significant cumulative impact related to shadow.

Recreation

Alternative E would have a slightly smaller development footprint and retain more of the existing on-site open space (particularly along Masonic Avenue) than the proposed project or project variant. Similar to the proposed project and project variant, Alternative E would involve the development of common and private open space to accommodate new residential uses. A program of open spaces along the northern portion of the site and in the open area along Euclid Avenue near Laurel Street would be developed under Alternative E and would be accessible to the public.

As discussed above under Population and Housing for this alternative, with 588 residential units there would be about 68 more residents than the proposed project but about 352 fewer than the project variant. Office uses are not proposed under this alternative. Therefore, the new resident population on the project site would not be substantially different from that of the proposed project or project variant, and, similarly, would not increase the use of existing recreational facilities in the vicinity or require construction of new or expanded facilities.

Alternative E would continue to have less-than-significant project-level impacts, as described for the proposed project and project variant in Topic E.9, Recreation, of the initial study (pp. 163-170), and would not combine with cumulative projects in the vicinity or at the citywide level to generate a significant cumulative impact related to recreation resources.

Utilities and Service Systems

Similar to the proposed project or project variant, development under Alternative E would trigger the provisions of the City's Stormwater Management Requirements and Design Guidelines, and stormwater flows to the combined sewer system would be reduced by 25 percent. As discussed above under Population and Housing for this alternative, while there would be more residents than the proposed project, there would be fewer residents than the project variant and fewer employees than either the proposed project or project variant. Water and wastewater demand under this alternative would be less than that evaluated under the proposed project or project variant. Because wastewater flows would be less than under the proposed project or project variant, they would remain within the capacity of the Southeast Water Pollution Control Plant. Like the proposed project and project variant, compliance with local ordinances would limit impacts on landfills.

Thus, impacts on utilities and service systems under Alternative E would be similar to those described for the proposed project or project variant, and would also be less than significant, as discussed for the proposed project and project variant in Topic E.10, Utilities and Service Systems, of the initial study (pp. 173-188). Similarly, Alternative E would not combine with cumulative projects in the site vicinity or at the citywide level to generate a significant cumulative impact related to utilities and service systems.

Public Services

As discussed above under Population and Housing for this alternative, the residential population on the project site would be slightly greater than the proposed project but less than the project variant, and the employed population would be less than both the proposed project or project variant.

Like the proposed project and project variant, as discussed in Topic E.11, Public Services, of the initial study (pp. 189-197) and supplemented in Section 4.F, Alternative E, with a roughly similar, but slightly reduced, land use program, would have less-than-significant project-level impacts, and would not combine with other cumulative projects in the vicinity to such a degree as to generate a significant cumulative impact related to public services.

Biological Resources

Compared with the proposed project and project variant, although the same number of protected trees would be removed, Alternative E would reduce impacts on biological resources because it would result in less ground disturbance, remove fewer trees and less vegetation, and have a reduced overall construction program. There would be no skybridge as under the proposed project or project variant and the vertical addition to the office building would not be as tall; however, window replacement, as with the proposed project or project variant, would need to be conducted in accordance with planning department guidance for bird-safe glazing. The discussion of biological resources impacts in Topic E.12, Biological Resources, of the initial study (pp. 197-204), the mitigation measure identified to reduce the impact on nesting birds, and the conclusion of less-than-significant impacts with mitigation are applicable to Alternative E. The alternative would not combine with other cumulative projects in the vicinity to create a significant cumulative impact on biological resources, as found for the proposed project and project variant.

Geology and Soils

Alternative E would involve slightly less excavation and soil disturbance and would have a slightly smaller development footprint compared to the proposed project and project variant. As with the proposed project and project variant, Alternative E would require mitigation in the event of inadvertent discovery of paleontological resources (see initial study pp. 214-215). Similar to the proposed project and project variant, new development under Alternative E would be required to comply with the building code standards to reduce seismic hazards. All other geology and soils issues would be the same as discussed for the proposed project or project variant on initial study pp. 205-216. As found in the initial study and with a reduced development program, Alternative E's project-level impacts related to geology and soils would remain less than significant, and it would not combine with other nearby projects to produce a significant cumulative impact.

Hydrology and Water Quality

The Alternative E development footprint would be slightly smaller than that for the proposed project or project variant and there would be slightly less ground disturbance. Therefore, impacts on hydrology and water quality during construction would remain less than significant as for the proposed project and project variant, as concluded in the initial study (see Topic E.14, Hydrology and Water Quality, pp. 216-227). Operational impacts related to hydrology and water quality would also be similar to or less than those identified for the proposed project or project variant, as discussed. Thus, with a reduced development program, Alternative E's project-level impacts would continue to be less than significant and the alternative would not combine with other nearby projects to cause a significant cumulative impact on hydrology or water quality.

Hazards and Hazardous Materials

Under Alternative E the demolition, excavation, and construction program and development footprint would be slightly smaller than the proposed project and project variant. Alternative E would include approximately 8 percent less floor area than the proposed project (14 percent less than the project variant) and similar land uses (residential, retail and daycare, but not office). The existing annex building would be demolished. The existing office building would be retained with some demolition, including demolition of the south wing, for its adaptation for residential use.

Alternative E would involve the removal of hazardous building materials and soils as with the proposed project or project variant. The volume of demolished building materials and excavated soils containing hazardous materials would be slightly reduced compared to the proposed project or project variant. As discussed under Topic E.15, Hazards and Hazardous Materials, initial study pp. 227-240 and supplemented in EIR Section 4.F, excavation would be in areas where known hazardous contaminants persist in the subsurface soils due to historic uses such as those in the annex building. Excavation would also occur in areas where bedrock containing serpentinite (i.e., naturally occurring asbestos) may be encountered, as with the proposed project or project variant. Because the overall excavation program would be slightly more limited under Alternative E, the potential to encounter naturally occurring asbestos would also decrease. Alternative E would be subject to the same regulatory requirements associated with the routine handling, transport, and disposal of hazardous materials, and the project sponsor would be required to create and implement a site mitigation plan, construction dust control plan, and asbestos dust control plan. Current UCSF laboratory uses would be removed in accordance with UC requirements and California Department of Public Health regulations for the closure and transport of hazardous materials associated with the laboratory use. For these reasons, as with the proposed project or project variant, hazardous materials impacts would be less than significant. As discussed for the proposed project or project variant, use of common household hazardous materials during operation would also result in less-than-significant impacts.

Access to the perimeter of the site would be similar to existing conditions, and access to the interior of the site would be provided with the addition of the Walnut Street extension and Mayfair Walk. Therefore, like the proposed project or project variant, Alternative E would have a less-than-significant impact related to emergency response.

Like the proposed project and project variant, as described in Topic E.15, Hazards and Hazardous Materials, of the initial study, Alternative E, with a slightly reduced development program, would have less-than-significant project-level impacts, and would not (in combination with the same cumulative projects) generate a significant cumulative impact related to hazards and hazardous materials.

Mineral and Energy Resources

As with the proposed project and project variant, Alternative E would have no impact on a mineral resource. Impacts of Alternative E on energy resources, with a slightly reduced construction program and land use program, would be less than significant, like the proposed project and project variant. Similarly, Alternative E would not combine with other cumulative projects in the vicinity or at the citywide or regional level to generate a significant cumulative impact related to mineral and energy resources.

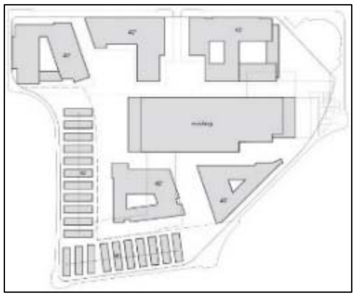
Agricultural and Forest Resources

As with the proposed project and project variant, Alternative E would have no impacts related to agricultural and forest resources.

CONCLUSION

By retaining much of the existing historic structure at 3333 California Street and reducing demolition and new construction compared to the proposed project or project variant, Alternative E would reduce the significant impact on the historic resource, but not to a less-than-significant level. As with the proposed project or project variant, the changes to the building, site and landscape features that convey the project site's corporate campus setting would be substantial enough to generate a similar significant impact, i.e., materially impair the property's ability to convey its historic significance. Thus, as with the proposed project or project variant, Mitigation Measures M-CR-1a and M-CR-1b would be required for this alternative and, similarly, would not reduce the significant and unavoidable impact on the historic architectural resource. Under Alternative E, the VMT impact would be reduced to a less-than-significant level with mitigation, as under the proposed project or project variant. Like the proposed project and project variant, Alternative E would generate significant and unavoidable impacts on transit capacity and construction noise. Impacts from construction vibration related to damage to off-site structures, and operational noise from new stationary sources would be less than significant with mitigation, as under the proposed project or project variant; and air quality impacts would be less than significant, also as under the proposed project or project variant. No other significant impacts beyond those identified in the initial study for the proposed project or project variant, e.g. archaeological resources (including human remains and tribal cultural resources), biological resources, and paleontological resources would occur. The same mitigation measures for the proposed project and project variant identified in the initial study would also be applicable to Alternative E, and impacts would be reduced to less-than-significant levels.

G. ALTERNATIVE F: CODE CONFORMING ALTERNATIVE

Overview: 	Considers maximum residential development potential of site as allowed by the planning code within the RM-1 and 40-X zoning and height and bulk districts, respectively, and with respect to Resolution 4109 conditions. Existing office building would be retained and adapted for residential use, up to 629 residential units. No addition to rooftop. Annex building demolished. Parking garage under existing office building partly retained. Twenty-six buildings (Plaza A, Plaza B, Walnut, Masonic, and Euclid buildings and 21 Laurel and Euclid Duplexes) constructed on full site. California Street and Masonic garages constructed. Mayfair Walk and extension of Walnut Street developed. Uses: Residential, limited retail; no office or daycare.
Character-Defining Features Retained:	• Limited character-defining features of existing building retained. • Compatible replacement of glass curtain wall system. • Most historic site and landscape features removed.
Comparison to Proposed Project and Variant:	• Changes to project site more extensive. • Develops 12 more buildings on project site. • Lower heights for Plaza A and B buildings and Walnut Building. • No vertical addition to existing office building. • No Walnut Walk on south portion of site or Euclid Green.

LAND USE PROGRAM

Alternative F would have a total of 1,180,004 gross square feet of new and rehabilitated space, as follows:

- 849,521 gross square feet of residential floor area (629 residential units)
- 14,995 gross square feet of ground-floor retail spaces
- 315,488 gross square feet of parking

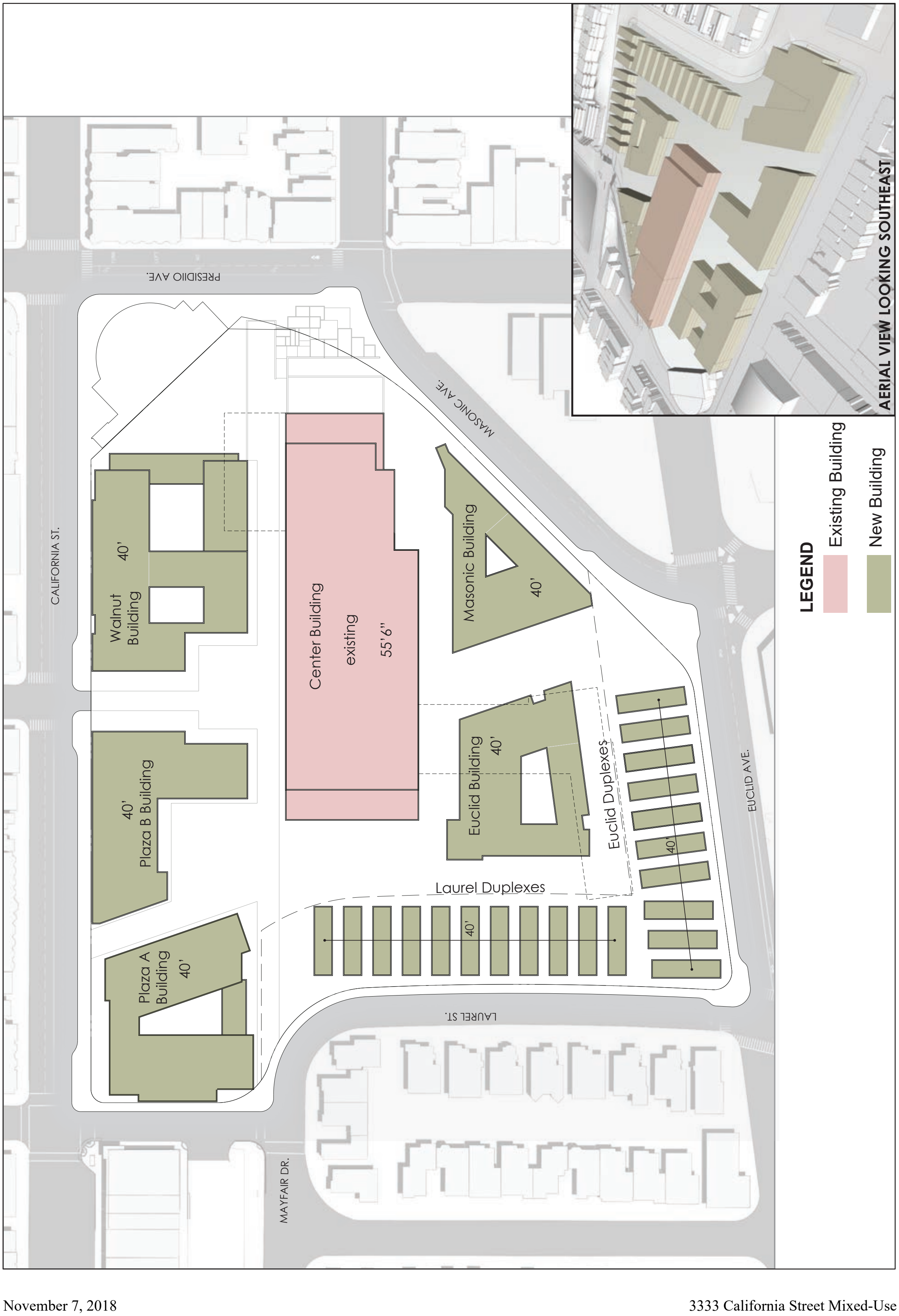
Similar to the project variant, there would be no office uses under Alternative F. Unlike the proposed project and project variant, retail uses would be located in the Plaza A Building only and there would be no daycare center use in the Walnut Building. With 629 residential units there would be 71 more than the proposed project and 115 fewer than the project variant. Three garages with up to three subterranean levels (the new California Street and Masonic garages and the retained parking garage under the adaptively reused residential building), and 21 individual two-car parking garages for the duplexes along Euclid Avenue and Laurel Street would provide up to 740 vehicle parking spaces, including 6 car-share spaces and 60 commercial parking spaces. (See Table 6.1, pp. 6.13-6.15.)

OVERVIEW

The approach to site planning and the land use program for Alternative F focused on the maximum residential development potential of the site as allowed by the planning code within the RM-1 and 40-X zoning and height and bulk districts, and with respect to the conditions of Resolution 4109. Resolution 4109 includes restrictions on the size of buildings, the locations and types of buildings on the site, and specific considerations for development along Euclid Avenue and Laurel Street (see Chapter 2, Project Description, pp. 2.24-2.26, for a more detailed discussion). Under Alternative F, the 3333 California Street project site would be redeveloped with residential uses and limited retail uses and would eliminate daycare center and office uses. Unlike the proposed project or project variant, rezoning would not be required; however, a planned unit development would be requested which would allow increased density and limited retail to support the development pursuant to planning code section 304(d)(5).[27]

Under Alternative F, 26 new buildings would be constructed (13 more than under the proposed project or project variant) and the existing office building would be adaptively reused for residential use without being separated into two different structures, for a total of 27 buildings (see Figure 6.14: Alternative F: Code Conforming Alternative - Site Plan and Table 6.1, pp. 6.13-6.15). Project site changes would be greater than those under the proposed project or project variant. Under Alternative F, as with the proposed project and project variant, the existing conditions on the northern portion of the site would be altered with development of three new buildings. However, the California Street buildings would all be 40 feet tall, shorter than under the proposed project or project variant. As with the proposed project or project variant, demolition of the south wing of the existing office building and the auditorium under the east wing of the existing office building (along its south edge near Masonic Avenue) would allow for the development of the Masonic and Euclid buildings and the associated Masonic Garage on the southern and eastern portions of the project site. The footprint of the Euclid Building would be smaller than with the proposed project or project variant to allow for development on the grass lawn along the edge of Euclid Avenue. Existing conditions on the southern and western portions of the project site along Euclid Avenue east of Laurel Street, and along Laurel Street south of Mayfair Drive, would be altered more substantially with development of 21 separate, two-unit, four-story townhomes. There would be 10 townhomes along Euclid Avenue instead of the Euclid

[27] Pursuant to Planning Code Section 304(d)(5), Planned Unit Developments shall, within R Districts, include commercial uses only to the extent that such uses are necessary to serve residents of the immediate vicinity, subject to the limitations for NC-1 Districts.



Source: Laurel Heights Partners, LLC (2018)

3333 CALIFORNIA STREET MIXED-USE PROJECT

2015-014028ENV

FIGURE 6.14: ALTERNATIVE F: CODE CONFORMING ALTERNATIVE - SITE PLAN

Green (publicly-accessible open space) and the Euclid Terrace (private open space). Along Laurel Street 11 new townhomes would be developed instead of the multi-family Mayfair Building and seven Laurel Duplexes.

REUSE OF EXISTING BUILDING

Under Alternative F, the northerly extension of the east wing, a portion of the existing parking garage, the auditorium under the east wing, and the whole south wing would be demolished. The retained building would be adaptively reused as a residential building and the glass curtain and painted aluminum window wall system would be replaced with a compatible design that reflects the change in use from office to residential. However, unlike the proposed project or project variant, the existing building would not be separated into two residential buildings and vertical additions would not be constructed. Therefore, the retained building's rooftop mechanical equipment rooms would likely remain.

As with the proposed project or project variant, the adaptive reuse of the existing office building for residential use, common areas, and ground floor residential amenity spaces would require the renovation and/or installation of new building systems. With partial demolition, the footprint of the retained building would be altered from that under existing conditions and the proposed project or project variant. (See Chapter 2, Project Description, Figures 2.3 and 2.32, pp. 2.5 and 2.102, respectively, and Figure 6.14, p. 6.172.) There would be a total 259,157 gross square feet of residential uses (135 residential units) in the adaptively reused residential building (see Table 6.1, pp. 6.13-6.15).

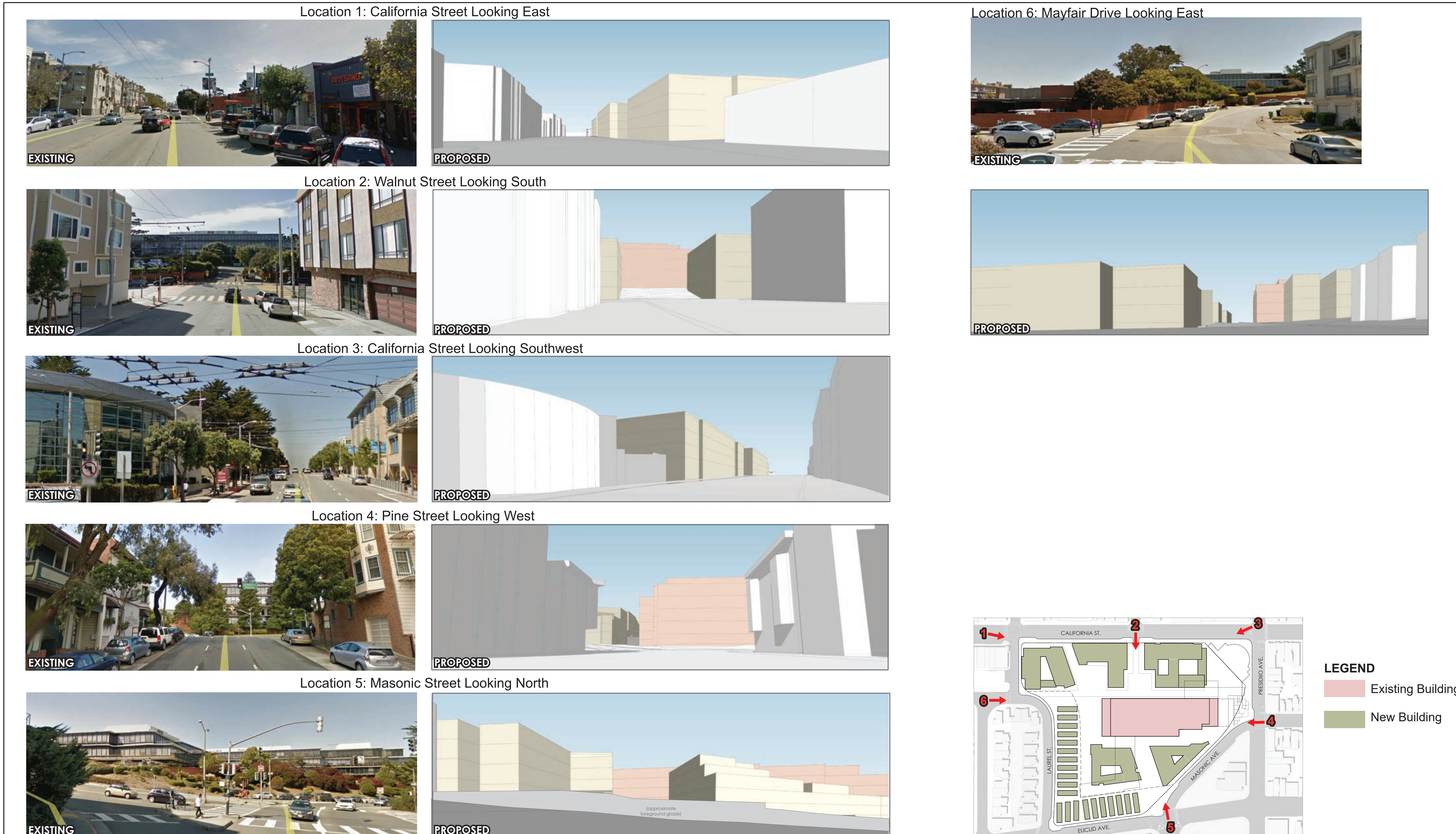
NEW CONSTRUCTION

The footprints of the Plaza A, Plaza B, and Walnut buildings on California Street and the Masonic Building along Masonic Avenue would be the same as with the proposed project or project variant. (See Chapter 2, Project Description, Figures 2.3 and 2.32, pp. 2.5 and 2.102, respectively, and Figure 6.14, p. 6.172.) However, the footprint of the Euclid Building along Euclid Avenue, just south of the adaptively reused residential building, would be smaller than that with the proposed project or project variant, and the Mayfair Building would not be developed. The Euclid Avenue and Laurel Street frontages would be developed with 21 duplexes, instead of seven duplexes and the Mayfair Building along Laurel Street. (See Figure 6.15: Alternative F: Code Conforming Alternative – Building Massing, for building massing on the project site from different locations around the site.)

As with the proposed project or project variant, the Plaza A, Plaza B, and Walnut buildings would be constructed along California Street; however, the design and program for these buildings would be slightly different to meet the 40-foot-height limit and the limitations on retail uses. Under Alternative F, the Plaza A and Plaza B buildings would be 40 feet tall, rather than 45 feet in the proposed project or project variant. The Plaza A Building would have 14,995 gross square feet of ground floor retail, and there would be no retail in the Plaza B or Walnut buildings. Under Alternative F, the Walnut Building would be 40 feet tall (not 45 or 67 feet as with the proposed project or project variant, respectively).

As with the proposed project or project variant, the southern and eastern portions of the project site along Euclid and Masonic avenues and immediately south of the adaptively reused residential building would be developed with the Masonic and Euclid buildings. The Masonic and Euclid residential buildings would be the same height as those in the proposed project or project variant: 40 feet tall with four to six stories. Unlike the proposed project or project variant, the Euclid Building under Alternative F would have a smaller footprint and would not include a retail use. The Euclid Building would be surrounded by private terraces and landscaped areas on the north, east and west sides, similar to the proposed project or project variant but without Walnut Walk on the east side. It would be set back approximately 135 feet from the south (Euclid Avenue) property line. Unlike the proposed project or project variant, under Alternative F a 100-foot-deep portion of the grass lawn that extends east along Euclid Avenue from Laurel Street on the west to the intersection of Masonic and Euclid avenues would be redeveloped with 10 separate, two-unit duplexes. Each of the duplexes would be set back from the south property line by 10 feet, would be four stories tall, and would be 40 feet in height. There would be a 47-foot rear yard between the duplexes along Euclid Avenue and the south edge of the Euclid Building.

Eleven duplexes (rather than seven duplexes and the Mayfair Building with the proposed project or project variant) would be constructed along Laurel Street within a 100-foot-deep portion of the site (as measured from the west [Laurel Street] property line). The duplexes would be four stories and 40 feet tall, as they would be with the proposed project or project variant, and would have below-grade, two-car parking garages. The duplexes would be set back 10 feet from Laurel Street (not 25 feet [or 60 feet for the fourth duplex only under the proposed project or project variant]). The two existing mature Coast Live Oak trees and one Monterey Pine along the western portion of the site (within the area proposed as Euclid Green under the proposed project or project variant) would not be retained, unlike the proposed project or project variant. In addition, there would be a 56-foot rear yard between the duplexes along Laurel Street and the west edge of the Euclid Building.



Source: Laurel Heights Partners, LLC (2018)

3333 CALIFORNIA STREET MIXED USE PROJECT

FIGURE 6.15: ALTERNATIVE F: CODE CONFORMING ALTERNATIVE - BUILDING MASSING

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SITE ACCESS AND PARKING

PARKING AND CIRCULATION

Off-Street Parking and Circulation

Alternative F would provide two new below-grade parking garages: the California Street Garage, which would be constructed under the Plaza A, Plaza B, and Walnut buildings and the Masonic Garage, which would be developed under the Masonic and Euclid buildings. The parking garage under the existing office building would be partly retained. In addition, each of the duplexes along Euclid Avenue and Laurel Street would have private, two-car parking garages. Unlike the proposed project or project variant the Mayfair Garage would not be constructed because the Mayfair Building would not be part of Alternative F.

Overall, there would be a total of 740 off-street parking spaces under Alternative F: 629 spaces for residential uses, 45 spaces for retail uses, 60 commercial parking spaces, and 6 car-share spaces. Thus, Alternative F would provide 156 fewer parking spaces than the proposed project and 230 fewer spaces than the project variant. A total of 287 off-street residential parking spaces for the adaptively reused residential building (82 spaces), the Euclid Building (102 spaces), the Masonic Building (61 spaces), and the duplexes along Euclid Avenue and Laurel Street (42 spaces) would be provided within the Masonic Garage and within the private, two-car parking garages for the Euclid and Laurel duplexes. All other off-street parking associated with the residential use (342 spaces) would be provided in the California Street Garage and the retained parking garage under the adaptively reused residential building. All off-street parking associated with retail uses (45 spaces) would also be located in the California Street Garage along with the commercial parking spaces (60 spaces) and car-share spaces (6 spaces).

Under Alternative F vehicles would enter and exit the California Street and Masonic garages and the retained parking garage from the same access points as with the proposed project or project variant:

- An entry/exit driveway from California Street into the project site with separate entry/exit driveways off each side of the Walnut Street extension into the California Street Garage.
- A shared driveway off Presidio Avenue. The driveway would have one entry/exit to the off-street freight loading dock in the California Street Garage. Another separate entry (ingress only) would lead to the parking spaces on Basement Levels B3 and B2 of the California Street Garage and to the parking spaces in Basement Level B3 of the existing parking garage.
- An exit-only driveway onto Masonic Avenue near the intersection with Pine Street for the California Street Garage and the renovated garage under the existing office building.
- An entry/exit driveway off Masonic Avenue for the Masonic Garage.

- A right-turn in entry/right-turn out exit driveway onto Laurel Street between California Street and Mayfair Drive for the California Street Garage.

Unlike the proposed project or project variant, under Alternative F the private garages for each of the duplexes along Euclid Avenue and Laurel Street would be accessed from 21 individual driveways (9 along Euclid Avenue and 12 along Laurel Street).[28] (See Figure 6.16: Alternative F: Code Conforming Alternative – Site Access for site and garage access points and the footprint of the retained and new parking garages.)

Except on Euclid Avenue and Laurel Street, the circulation changes under Alternative F would be similar to those for the proposed project or project variant as the same changes to curb cuts along California Street, Presidio Avenue, and Masonic Avenue would occur. Unlike the proposed project or project variant, due to development of additional duplexes, there would be five additional curb cuts on Laurel Street and nine curb cuts on Euclid Avenue under Alternative F.

As with the proposed project or project variant, emergency vehicles would continue to have access to the perimeter of the project site to provide emergency services such as fire protection. Emergency vehicles would be able to access the center of the site via the Walnut Street extension and the west end of Mayfair Walk.

On-Street Parking

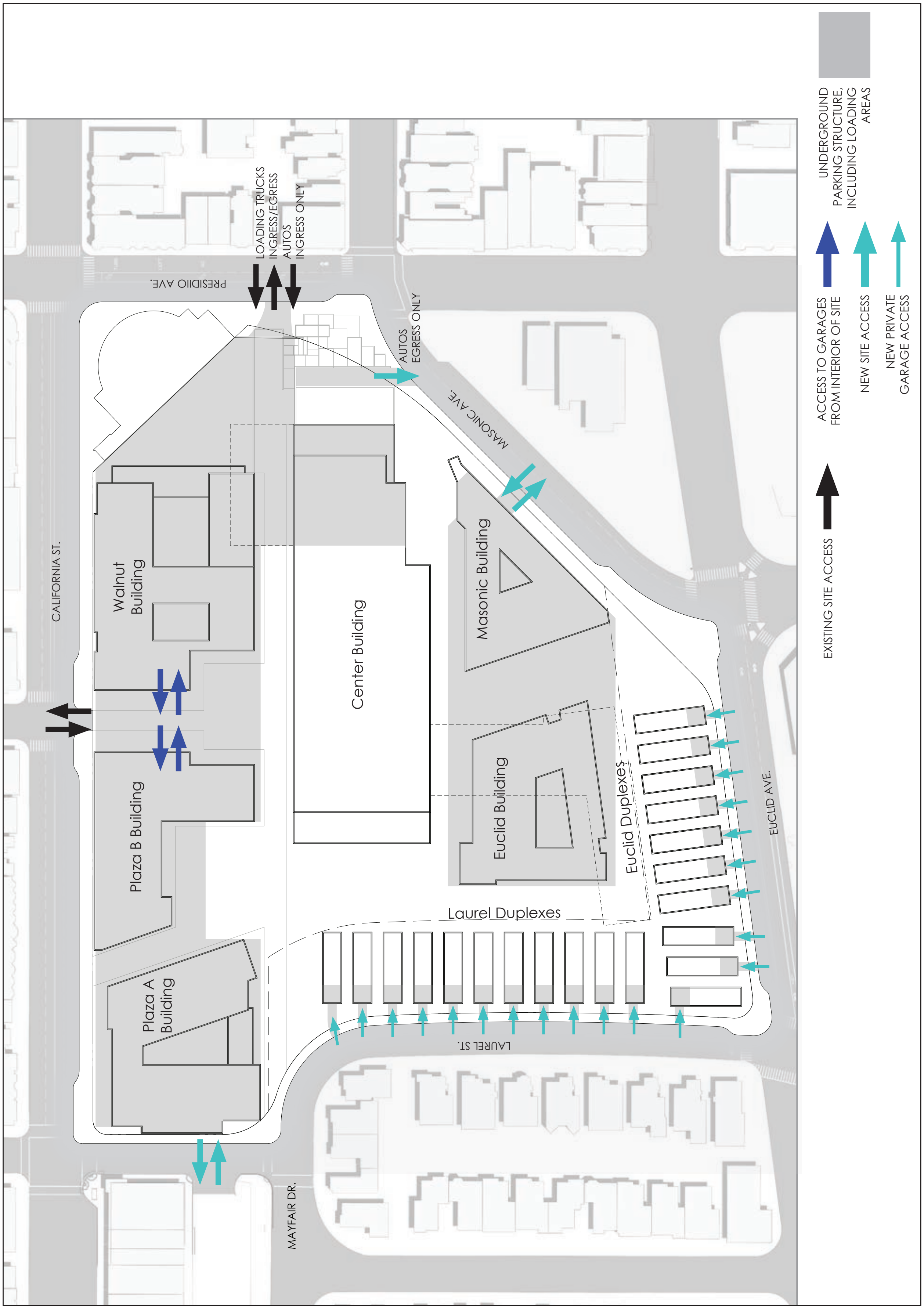
Alternative F would reduce the number of on-street vehicle parking spaces, as would the proposed project or project variant. It would remove more of these spaces than the proposed project or project variant would, because there would be more curb cuts introduced on Euclid Avenue and Laurel Street and the same number of spaces would be converted to on-street loading spaces. Overall, there would be a net reduction of 59 on-street parking spaces under Alternative F (23 more than under the proposed project or project variant).

PEDESTRIAN CIRCULATION

Under Alternative F, unlike the proposed project or project variant, the project site would be only partially integrated with the existing street grid. Mayfair Walk and the extension of Walnut Street would be developed; however, Walnut Walk would not. Pedestrian access would be provided at the following locations:

- at the western (Mayfair Drive) and eastern (Presidio Avenue and Pine Street) ends of Mayfair Walk with access to Presidio Avenue and Pine Street via the proposed Pine Street Steps and Plaza

[28] The westernmost townhome along Euclid Avenue would be accessed from a driveway on Laurel Street.



Source: Laurel Heights Partners, LLC (2018)

3333 CALIFORNIA STREET MIXED-USE PROJECT

2015-014028ENV

FIGURE 6.16: ALTERNATIVE F: CODE CONFORMING ALTERNATIVE - SITE ACCESS

- from a walkway between the Plaza A and Plaza B buildings (Cypress Stairs) at the midblock of California Street between Laurel and Walnut streets
- from the extension of Walnut Street into the project site, which would terminate at a roundabout

Public access from the corner of Masonic and Euclid avenues or Laurel Street and Euclid Avenue would not be provided, unlike the proposed project or project variant, because lower Walnut Walk would not be developed near Corner Plaza, and the space along Euclid Avenue east of Laurel Street toward Corner Plaza would be developed with a row of duplexes rather than as an open space.

FREIGHT AND PASSENGER LOADING PROGRAM

There would be ten on-street freight and passenger loading spaces, and six off-street freight loading spaces in Alternative F, the same as the proposed project and project variant.

Commercial Freight and Passenger Loading: As with the proposed project or project variant, under Alternative F six off-street commercial and residential freight loading spaces would be developed in the California Street and Masonic garages, accessed from Presidio and Masonic avenues. These freight loading spaces would accommodate trucks up to 55 feet long and would provide the required 15-foot vertical clearance for the entrances. As with the proposed project or project variant, under Alternative F commercial freight loading activities would occur at the off-street freight loading area in the California Street Garage and would serve all retail tenants via service corridors, elevators, and internal stairs. Five on-street parking spaces on the south side of California Street near Laurel Street would be converted to create one 100-foot-long on-street commercial loading zone. As with the proposed project or project variant, under Alternative F the conversion of 10 on-street parking spaces into three separate 60-foot-long passenger loading zones along Masonic Avenue, Euclid Avenue, and Laurel Street would be sought. Thus, the same number of on-street spaces (15) would be converted to commercial freight or passenger loading zones. In addition, under Alternative F, as with the proposed project or project variant, passenger loading would also occur at the roundabout at the terminus of the Walnut Street extension into the project site.

Residential Move-In and Move-Out Loading Activities: As with the proposed project or project variant, under Alternative F residential move-in and move-out loading activities for the new and renovated buildings would occur within the off-street freight loading areas in the California Street and Masonic garages or from existing on-street spaces along California Street, Masonic Avenue, Euclid Avenue, and Laurel Street (with a special time-limited permit from the SFMTA for use of existing on-street parking spaces).

Trash/Waste Pick-Up: As with the proposed project or project variant, solid waste would be collected at the off-street refuse staging area adjacent to the freight loading areas in the California Street and Masonic garages and compacted for offsite transport. Solid waste from the off-street loading areas and Euclid Avenue and Laurel Street curbs would be picked up by Recology on a regularly scheduled service program.

STREETSCAPE CHANGES

Under Alternative F, as with the proposed project or project variant, the streetscape changes at the Masonic Avenue/Presidio Avenue/Pine Street and Masonic Avenue/Euclid Avenue intersections would be implemented and integrated with adjacent landscape or open space features, i.e., the Pine Street Steps and Plaza and Corner Plaza. (See Chapter 2, Project Description, Figure 2.28a and Figure 2.28b, pp. 2.81 and 2.82, for an illustration of the proposed changes at these two locations.) Under Alternative F, the proposed streetscape changes at these two locations would also entail elimination of the westbound slip lanes and incorporation of the pedestrian refuge islands into the proposed plazas. The corner bulb-out at the northeast corner of Laurel Street/Mayfair Drive at the three-way intersection along with an eastside crosswalk crossing Mayfair Drive would also be constructed, as with the proposed project or project variant.

Streetscape changes under Alternative F, as with the proposed project or project variant, would include sidewalk widening along Presidio Avenue, Masonic Avenue, Euclid Avenue, and Laurel Street; and corner bulb-outs at the southeast corner of the California Street/Laurel Street intersection,[29] at the southwest and southeast corners of the California Street/Walnut Street intersection, and at the northeast corner of the Laurel Street/Euclid Avenue intersection.

OPEN SPACE AND LANDSCAPING

OPEN SPACE

As with the proposed project or project variant, under Alternative F a similar open space and public access program would be developed along the northern portion of the site with construction of the proposed mixed-use residential buildings, i.e., Mayfair Walk, California Street Plaza, Cypress Stairs, Cypress Square, Presidio Overlook, and Pine Street Steps and Plaza. As described above, under Alternative F the southern and eastern portions of the site would be developed with the Masonic Building, the Euclid Building, and the duplexes along Euclid Avenue and Laurel Street. As with the proposed project or project variant, the Corner Plaza, Mayfair Walk, and Masonic Plaza would be developed; however, unlike the proposed project or project variant, the lower Walnut Walk and Euclid Green would not be developed. Under Alternative F,

[29] The corner bulb-outs at the northeast and southeast corners of the California Street/Laurel Street intersection would be built as part of the California Laurel Village Improvement Project and related Muni Forward improvements.

unlike the proposed project or project variant, up to 7 (not 10) mature trees on the site would be retained and protected during construction, 22 (not 19) onsite significant trees would be removed, and 15 street trees along California Street would be removed and replaced. Site development under Alternative F would comply with the Urban Forestry Ordinance similar to the proposed project or project variant; and the removal of significant trees would require application and approval of a permit from public works.

ABILITY TO MEET PROJECT OBJECTIVES

Alternative F would meet most of the basic project objectives, although in most cases to a lesser degree than would the proposed project or project variant. Alternative F would redevelop a large underutilized commercial site at about the same development intensity but with a limited mix of uses (residential with limited retail space, no daycare or office uses), reducing walkability and convenience (Objectives 1 and 2). This alternative would increase the City's housing supply (Objective 3) with 629 residential units, 71 more units than the proposed project, but 115 fewer units than the project variant. Alternative F would open and connect the site to the surrounding community by extending the neighborhood urban pattern and surrounding street grid into the site through a series of pedestrian pathways and open spaces, but to a lesser degree, as only Mayfair Walk, and not Walnut Walk, would be developed to extend through the entire site (Objective 4). Alternative F would provide a significantly reduced level of active ground floor retail uses, and fewer activated neighborhood-friendly spaces along the adjacent streets, and therefore would achieve Objective 5 to a lesser degree than the proposed project or project variant. Alternative F would be less effective at providing high quality and varied architectural and landscape design, without retention of the Euclid Green, and therefore would achieve Objective 6 to a lesser degree than the proposed project or project variant. Alternative F would construct some open spaces such as the plazas and Mayfair Walk that would be usable to project residents and surrounding community members but without retention of the Euclid Green and, therefore, would achieve Objective 7 to a lesser degree than the proposed project or project variant. Alternative F would meet Objective 8 by providing code-required open space; however, open space would not be as varied or designed to maximize pedestrian accessibility. Alternative F would include sufficient off-street parking to meet the project's needs (Objective 9), and it would retain and integrate the existing office building into the development (Objective 10).

CONSTRUCTION

As with the proposed project or project variant, Alternative F would be constructed in four phases, over a similar 7-year construction timeframe. Similar to the proposed project or project variant, development could extend up to 15 years, depending on market conditions. Construction activities included in the representative phases are listed below, but note that similar to the proposed project or project variant, the construction phases could be implemented in a different order.

- First phase: Demolition of the circular garage ramp structures, the northerly extension of the east wing of the existing office building, the auditorium under the east wing of the existing office building, and the south wing of the existing office building; excavation on the southern and eastern portions of the site and site preparation and construction of the Masonic and Euclid buildings (and associated Masonic Garage) as well as the duplexes along Euclid Avenue.
- Second phase: Alterations to the existing office building for its adaptive reuse as a residential building.
- Third phase: Demolition of the existing annex building and the surface parking lots on the north portion of the site and excavation and site preparation for construction of the California Street buildings and associated California Street Garage.
- Fourth phase: Demolition of the surface parking lot and associated landscaping on the west portion of the site near Laurel Street and excavation and site preparation for construction of the duplexes along Laurel Street.

As with the proposed project or project variant, excavation under Alternative F would extend to a depth of approximately 40 feet below ground surface and would encounter bedrock; however, the ground disturbance and total volume of excavated soils would be similar to that for the proposed project or project variant.

IMPACTS OF ALTERNATIVE F: THE CODE CONFORMING ALTERNATIVE

CULTURAL RESOURCES (HISTORIC ARCHITECTURAL RESOURCES)

Approach

The approach for Alternative F focused on the adaptive reuse of the existing building for residential uses while still retaining some character-defining features of the building. No consideration was given to retaining the site and landscape features as the full site would be redeveloped with new buildings. Thus, under Alternative F elements of the existing office building would be retained but a limited number of the site and landscape features would be retained. (See Table 6.1, pp. 6.13-6.15 for the disposition of the character-defining features under Alternative F, and Figure 6.14 and Figure 6.15, pp. 6.172 and 6.175).

Retention of Character-Defining Features

The disposition of the site and landscape features under Alternative F is as follows:

Character-Defining Features	Level of Retention (Alternative F)
Existing Office Building	**Partially Retained**
Stepped multi-story massing built into the natural topography of the site	Partially retained
Office building encompassing three distinct building phases that have all taken on significance	Partially retained, partial demolition of east wing, including auditorium, and whole south wing
Midcentury Modern architectural style with little ornamentation	Retained
Flat, cantilevered roof with projecting eaves	Retained
Continuous full-height, slightly recessed curtain wall glazing on most sides and along all levels of the building	Replaced with compatible residential window wall system
Glass curtain wall composed of bronze powder-coated aluminum framing system in a regularly spaced pattern of mullions and muntins, typically with a small spandrel panel of obscure glass below a larger pane	Replaced with compatible residential window wall system
Site and Landscape	**Demolished**
Corporate campus setting featuring an office building located on a large, open landscaped site across 10.25 acres	Demolished, development of whole site with 26 new buildings
Landscape utilizing curvilinear shapes in pathways, driveways, and planting areas; and other integrated landscape features (planter boxes, seating)	Demolished
– *elements on northern and western portions of the project site*	– *Demolished*
– *open space/sloped lawn on Laurel Street*	– *Demolished*
– *open space/lawn at Presidio and Masonic avenues*	– *Demolished*
– *elements of the private courtyard/landscaped areas on south and east sides of the existing office building*	– *Demolished*
Main entrance leading from Walnut and California streets	Retained
Brick perimeter walls, integrated planter boxes, and retaining walls of reinforced concrete and clad in stretcher bond pattern	Demolished
– *Perimeter brick wall that borders north and west (partial) boundaries of project site*	– *Demolished*
– *Brick retaining walls in the private courtyard/landscaped area on south side of existing office building*	– *Demolished*
– *Brick retaining walls in the private courtyard/landscaped area on east side of existing office building*	– *Demolished*
Mature trees around the corporate modern campus	Mostly removed, with retention of some mature trees along northern and eastern portions of site
Open area along Euclid Avenue and Laurel Street	Demolished, redeveloped with 10 new duplexes
Concrete pergola atop terraced planting facing Laurel Street	Demolished

Under Alternative F, fewer changes would be made to the existing office building than under the proposed project or project variant. The major differences between Alternative F and the retained building under the proposed project and project variant would be its retention as one structure without a vertical addition. Under Alternative F, new construction would infill the open area around the perimeter of the site more extensively than the proposed project or project variant.

Changes to the existing office building would include demolition of the north-facing entry on its north façade, the northerly extension of the east wing, the exposed concrete piers along with the circular garage ramp structures, the auditorium under the south portion of the east wing, and the whole south wing.

Summary of Ability to Meet Secretary of Interior's Standards for Rehabilitation

CEQA Guidelines section 15064.5(b)(3) includes a presumption that a project that conforms with the Secretary's Standards would generally have a less-than-significant impact on a historical resource. As described above, Alternative F would retain some of the existing office building's character-defining features, but nearly all of the character-defining features of the site and landscape would be demolished. The relevant rehabilitation standards are discussed below with a short explanation regarding the alternative's ability to meet the standards.

Rehabilitation Standard 1 states that the "property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces and spatial relationships." As described above, under Alternative F the historic office use would be discontinued and changes to the building would include the removal of its whole south wing, portions of the east wing, and replacement of the window wall system with a compatible residential-based system. Additionally, new buildings with residential, and retail, and daycare uses would be introduced to the site. The new buildings would be constructed all around the site resulting in changes to the site's open areas that create the corporate campus environment. These changes, and the resultant effect on the distinctive materials, features, spaces, and spatial relationships of the building, site, and landscape features, would be beyond the minimal changes acceptable under Standard 1. Thus, when considered together the changes to the building, site, and landscape features would not conform with Standard 1.

Rehabilitation Standard 2 states that the "historic character of a property shall be retained and preserved," and "removal of historic materials or alteration of features and spaces that characterize a property shall be avoided." Rehabilitation Standard 5 states that "distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a historic property shall be preserved." Under Alternative F the modifications to the existing building would include the replacement of the window wall system with a compatible residential-based design and changes to the building's historic footprint through removal of portions of the east wing and the whole south wing. Changes to the building would be substantial in that close to

50 percent of the building would be removed. Although Alternative F would retain some of the character-defining features of the existing office building, e.g., the Midcentury Modern architectural style with little ornamentation and the flat cantilevered roof with projecting eaves, other historic features would be compromised by the proposed changes and new development, e.g., the stepped multi-story massing built into the natural topography of the site and the building's three distinctive phases of construction. New infill construction would result in the demolition/removal of all of the curvilinear shapes in pathways, driveways, and planting areas; integrated landscape features such as planter boxes and seating; brick perimeter walls; and the concrete pergola atop a terraced open area facing Laurel Street as well as the removal of mature trees. Thus, when considered together the changes to the building, site, and landscape features would not conform with Standards 2 and 5.

Rehabilitation Standard 9 states that "new additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property," and "new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property." Under Alternative F, as described above, the size, scale, materials, and design of the exterior alterations would distinguish it from the original building yet be compatible with Midcentury Modern design principles. Demolition would change the building's footprint, substantially altering the building's general form and massing. As stated above, new infill construction would demolish/remove all of the curvilinear shapes and hardscape features of the site and landscape on the property. Thus, when considered together the changes to the building, site, and landscape features would not conform with Standard 9.

Rehabilitation Standard 10 states that "new additions and adjacent or related new construction shall be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired." Under Alternative F, the demolition of portions of the east wing and the whole south wing of the building would represent an irreversible change to the essential form and integrity of the building. Thus, when considered together with new construction, which would remove nearly all of the character-defining features of the site and landscape, the essential form and integrity of the Midcentury Modern designed corporate campus and its environment would not be able to be restored to its previous state even if new buildings were to be removed in the future. Thus, Alternative F would not conform with Standard 10.

Conclusion

Demolition of the building's south wing and portions of its east wing would alter the historic footprint, and the stepped multi-story massing built into the natural topography of the site would only be partially retained due to demolition and new construction. These changes would alter the footprint and massing of the building, which express the building's phased construction. The

Midcentury Modern architectural style with little ornamentation and the flat, cantilevered roof with projecting eaves would be retained; however, alterations for residential use would result in the replacement of the glass curtain and painted aluminum window wall system.

Alternative F would include the construction of 26 new buildings along California Street, Presidio Avenue/Masonic Avenue, Euclid Avenue, and Laurel Street. Under Alternative F the site would be densely developed with residential uses, limited retail uses, and no daycare or office uses; a change from the site's historic use. Unlike the proposed project and project variant, the open area along Euclid Avenue and Laurel Street would be redeveloped with ten new buildings; thus, more of the site would be redeveloped and altered from an open, landscaped corporate campus. As with the proposed project or project variant, construction of the Masonic and Euclid buildings would alter the most prominent views of the project site, from the east on Pine Street (looking west) and from the south on Masonic Avenue (looking north) toward the terraced southeastern slope and existing building with its stepped, multi-story massing integrated with the site's topography, open spaces with private courtyards, terraced landscaping, and mature trees, and the green lawn extending east along Euclid Avenue.

Changes to the character-defining features of the building, site, and landscape, in tandem with the construction of 26 new buildings, would result in a material change to the property's distinctive materials, features and spatial relationships that convey its historic and architectural significance as an urban adaptation of a suburban corporate campus model. New construction and changes to the existing office building would result in substantial adverse changes to the distinctive materials, features, spaces, and spatial relationships on the property. Although the retention, rehabilitation, and reuse of the existing office building under Alternative F would avoid the physical loss of the office building, the removal of character-defining site and landscape features, in combination with the construction of 26 new buildings along California Street, Laurel Street, Masonic Avenue, and Euclid Avenue, would be more substantial than that under the proposed project or project variant, which was significant and unavoidable with mitigation.

The extent of the alterations to the character-defining building, site and landscape features would materially alter the physical characteristics of 3333 California Street that convey its historic and architectural significance as a Midcentury Modern-designed corporate campus and that justify its inclusion in the California Register. As such, Alternative F would cause a substantial adverse impact on 3333 California Street. Changes to the existing office building would not be as substantial as those under the proposed project or project variant (no vertical addition and no building separation) but more of the historic site and landscape would be removed (open area along Euclid Avenue). On balance the historic resource impacts of Alternative F would be comparable in degree to those of the proposed project or project variant. For this reason, as with the proposed project or project variant, under Alternative F implementation of Mitigation Measure M CR-1a: Documentation of Historical Resource and Mitigation Measure M-CR-1b:

Interpretation of the Historical Resource (see pp. 4.B.45-4.B.46) would be required. Implementation of these mitigation measures would reduce the significant impact of Alternative F, but not to a less-than-significant level.

<u>Off-site Historic Resources:</u> For the same reasons as the proposed project and project variant, Alternative F would have a less-than-significant impact on off-site historic architectural resources.

<u>Cumulative Impacts:</u> For the same reasons as the proposed project and project variant, Alternative F in combination with cumulative development in the vicinity of the project site would not result in a significant cumulative impact on historic architectural resources.

TRANSPORTATION AND CIRCULATION

Trip Generation

The travel demand for Alternative F was estimated for weekday daily and weekday a.m. and p.m. peak hours. A summary of the resulting external vehicle trips generated under Alternative F is shown in Table 6.13: Alternative F Vehicle-Trip Generation Comparison – External Trips.

Table 6.13: Alternative F Vehicle-Trip Generation Comparison – External Trips

Vehicle Trips	Daily [NOTE A]	Weekday AM Peak Hour	Weekday PM Peak Hour
Alternative F	2,465	340	388
Proposed Project	5,760	691	752
Difference [NOTE B]	-3,295 or 57.2% reduction	-351 or 50.8% reduction	-364 or 48.4% reduction
Alternative F	2,465	340	388
Project Variant	5,744	726	804
Difference [NOTE B]	-3,279 or 57.1% reduction	-386 or 53.2% reduction	-416 or 51.7% reduction

Notes:
[A] The weekday AM peak hour internal trip rate was applied to the daily person-trips to estimate the number of external vehicle trips.
[B] Total reflects external vehicle trips.

Source: *SF Guidelines*, 2002; Kittelson & Associates, Inc, 2018; *3333 California Travel Demand Memo*, March 2018

As shown in Table 6.2**,** p. 6.16, Alternative F would generate 891 external person-trips during the weekday a.m. peak hour: 554 auto person-trips (or 340 vehicle trips), 211 transit trips, 106 walk trips, and 20 trips by other modes. During the weekday p.m. peak hour, Alternative F would generate 1,031 external person-trips: 630 auto person-trips (or 388 vehicle trips), 244 transit trips, 127 walk trips, and 30 trips by other modes.

As shown in Table 6.13, Alternative F would result in between approximately 48 and 53 percent fewer vehicle trips as compared to the proposed project or project variant during the weekday a.m. and p.m. peak periods. As a result, Alternative F would result in slightly reduced operational transportation and circulation effects than those described for the proposed project and project variant.

Construction Transportation

Alternative F construction activities would occur on a similar timeframe and schedule as under the proposed project and project variant, and the same city requirements would apply. As with the proposed project or project variant, Alternative F would also result in a less than significant construction-related transportation impact. Although Alternative F would have a less-than-significant construction-related transportation impact, like the proposed project or project variant, Improvement Measure I-TR-1: Project Construction Updates, p. 4.C.74, could be implemented to further reduce the less-than-significant impact.

Operational Impacts

VMT Impacts

The average daily vehicle miles traveled per capita or per employee for the uses proposed in Alternative F would be the same as those described for the same uses under the proposed project and project variant. The existing average daily VMT per capita for residential uses, and per employee for retail uses are more than 15 percent below the existing and future regional averages for the project site's location. The analysis also compares parking rates for Alternative F's residential and retail uses to the neighborhood parking rates for those uses. Unlike the proposed project or project variant, Alternative F would not provide parking for other non-residential (office and daycare) uses because those uses would not be developed under this alternative. The residential parking rate accounts for residential units in the transportation analysis zone (TAZ) 709 and other nearby TAZs (within three-quarters of a mile based on walking distance) with more distant land use and parking given decreasing weight. The retail parking rate accounts for parking associated with retail uses along California and Sacramento streets near the project site. This information is presented in Table 6.14: Parking Rate Summary for Alternative F.

As shown in Table 6.14, Alternative F would provide parking for residential uses at the same rate as under the proposed project and project variant. Alternative F would provide 105 parking spaces (7.00 spaces per 1,000 square feet) for the retail uses, including 60 parking spaces that are allowable as accessory spaces. Alternative F would provide retail parking at a higher rate per square footage of retail use than the proposed project and project variant, respectively.

Table 6.14: Parking Rate Summary for Alternative F

Scenario/Land Use	Size	Vehicle Parking Spaces	Existing Neighborhood Parking Rate	Proposed Parking Rate	Change from Existing
Alternative F					
Residential	629 units	629	0.90	1.00	11%
Retail	14,995 gross square feet	105	1.55	7.00	352%
Other Non-residential	-	0	1.44	-	-
Proposed Project					
Residential	558 units	558	0.90	1.00	11%
Retail	54,117 gross square feet	198	1.55	3.66	136%
Other Non-residential	64,689 gross square feet	129	1.44	1.99	38%
Project Variant					
Residential	744 units	744	0.90	1.00	11%
Retail	48,593 gross square feet	188	1.55	3.87	150%
Other Non-residential	14,650 gross square feet	29	1.44	1.98	37%

Notes: The existing parking rate for residential uses reflects data for TAZ 709. The existing parking rate for retail and other non-residential uses reflects data from California Street and Sacramento Street, as provided by the planning department. The retail land use category for the proposed project and project variant includes the proposed 60 public parking (commercial) spaces on the project site. Car-share spaces are not included in the parking rate calculation.
Neighborhood Parking Rates:
Residential Parking Rate = 0.9 space/unit (neighborhood)
Retail Rate = 1.55/ 1,000 square feet (California and Sacramento)
Other Non-Residential Rate = 1.44/ 1,000 square feet (existing site)

Source: Kittelson and Associates, Inc. 2018; San Francisco Planning Department, 2018.

The increase in average daily VMT per employee associated with provision of retail parking spaces may increase VMT per capita enough to exceed the threshold of 15 percent below the regional average. As with the proposed project and project variant, the impact would be significant and implementation of Mitigation Measure M-TR-2: Reduce Retail Parking Supply, p. 4.C.80, would reduce the impact to less-than-significant levels.

Traffic Hazard Impacts

As discussed above, Alternative F would result in about 48 and 53 percent fewer vehicle trips than the proposed project and project variant during the weekday a.m. and p.m. peak hours. As a result, Alternative F would result in slightly reduced operational transportation effects compared to those described for the proposed project and project variant.

As with the proposed project or project variant, circulation changes under Alternative F would include the introduction, elimination, relocation, or retention of existing curb cuts on California Street; on Presidio and Masonic avenues; on Laurel Street; and on Mayfair Drive. Unlike the proposed project or project variant, under Alternative F there would 9 curb cuts on Euclid Avenue between Masonic Avenue and Laurel Street (not zero) and there would be 12 curb cuts on Laurel Street, south of Mayfair Drive (not seven).

While the introduction of new curb cuts and site access points along Euclid Avenue and Laurel Street would increase the number of conflict locations compared with the proposed project and project variant, the number of vehicle trips at these curb cuts would be low (less than one vehicle trip during the peak hours). As such, queues would not develop and vehicles accessing these driveways would not create traffic hazards or impede movement of vehicles traveling along Euclid Avenue and Laurel Street. Therefore, Alternative F would not substantially alter traffic operations. Thus, as with the proposed project and project variant, traffic hazard impacts would be less than significant and implementation of Improvement Measure I-TR-3: Driveway Queue Abatement, p. 4.C.82, would further reduce the less-than-significant traffic hazard impacts.

Transit Impacts

As shown in Table 6.2, p. 6.16, Alternative F would generate about 211 transit trips in the a.m. peak hour and about 244 in the p.m. peak hour, resulting in between 26 percent and 38 percent fewer transit trips than the proposed project or project variant in those periods.

Alternative F would add 10 riders to the 43 Masonic bus route and, as with the proposed project and project variant, would result in adverse impacts by increasing ridership to exceed the 85 percent capacity utilization during the weekday a.m. peak hour under baseline conditions. Therefore, as with the proposed project and project variant, Alternative F would have a significant impact on an individual Muni line and mitigation would be required. Implementation of Mitigation Measure M-TR-4: Monitor and Provide Fair Share Contribution to Improve 43 Masonic Capacity, pp. 4.C.87-4.C.88, would reduce the impact to less-than-significant levels. Under Alternative F, a fair share contribution of $127,982[30] would be conveyed to the SFMTA when monitoring, funded by the project sponsor beginning upon completion and occupancy of the first development phase, shows that capacity utilization has exceeded 85 percent. Similar to the proposed project or project variant, the SFMTA's ability to provide additional capacity or improve transit headways is uncertain; thus, the impact would remain significant and unavoidable after mitigation.

Since the number of peak hour transit trips is lower for Alternative F, compared to the proposed project and project variant, Alternative F would have a less-than-significant impact on regional transit routes.

Pedestrian Impacts

As with the proposed project or project variant, Alternative F would include widening of adjacent sidewalks; the introduction, elimination, and relocation of curb cuts; and the construction of

[30] See EIR Appendix G: Alternatives Analysis – Transportation and Circulation, Attachment A, Transit Capacity Analysis and Fair Share Contribution Calculations, p. 104.

corner bulbouts. However, Alternative F would introduce 9 new curb cuts on Euclid Avenue and 5 additional curb cuts on Laurel Street (for a total of 12). Similar to the proposed project or project variant Alternative F would include construction of Mayfair Walk. However, Alternative F would not include Walnut Walk. Alternative F would include the following streetscape changes as in the proposed project and project variant: the Pine Street Steps and Plaza, the Corner Plaza, and those at the Presidio Avenue/Masonic Avenue/Pine Street intersection and at Masonic and Euclid avenues. Unlike the proposed project and project variant, no public access from the corner of Laurel Street and Euclid Avenue would be provided due to development of duplexes rather than open space (i.e., the Euclid Green).

The pedestrian-related features of Alternative F would represent an improvement over existing conditions with respect to site accessibility, as they would include connections across the project site for pedestrians that do not exist under existing conditions; however, the site would not be fully integrated with the existing street grid. Pedestrian access would not be available from the south and east from Masonic and Euclid avenues or through the open space at Euclid Avenue and Laurel Street, because Walnut Walk and Euclid Green would not be developed. Thus, compared to the proposed project and project variant, pedestrian access to the site and circulation through the site would not be as complete under Alternative F with fewer access points.

As shown in Table 6.2, p. 6.16, Alternative F would generate approximately 317 pedestrian trips (211 walk trips and 106 transit trips) in the a.m. peak hour and 371 pedestrian trips (244 walk trips and 127 transit trips) in the p.m. peak hour. This would be between 47 percent and 54 percent fewer pedestrian trips than the proposed project or project variant during the weekday a.m. and p.m. peak periods. With fewer pedestrian trips than the proposed project and project variant, Alternative F also would not result in overcrowding on public sidewalks.

Alternative F would generate fewer vehicle trips than the proposed project and project variant; thus, this alternative would not substantially alter traffic operations creating potentially hazardous conditions or accessibility impacts for pedestrians. The decreased number of pedestrian and vehicle trips would not create hazardous conditions or accessibility impacts on pedestrians. As discussed in the traffic hazard impacts section, Alternative F would introduce nine additional curb cuts on Euclid Avenue and five additional curb cuts on Laurel Street, but overall would have the same number of conflict points compared with the proposed project or project variant. In addition, the number of vehicle trips at these curb cuts would be low (less than one vehicle trip during the peak hours). As such, queues would not develop, and vehicles would not block the sidewalk or create hazardous conditions or accessibility impacts for pedestrians.

As with the proposed project and project variant, the curb cuts and project driveways as well as the streetscape changes under Alternative F would not create hazardous conditions or accessibility impacts for pedestrians. Thus, pedestrian impacts under Alternative F, as with the proposed project and project variant, would be less than significant. Similarly, implementation of

Improvement Measure I-TR-3: Driveway Queue Abatement, p. 4.C.82, would further reduce the less-than-significant pedestrian impacts.

Bicycle Impacts

As stated above, Alternative F would increase the number of curb cuts along Euclid Avenue and Laurel Street compared to the proposed project or project variant. Overall, the number of driveway conflicts points under Alternative F would be the same as under the proposed project and project variant; however, unlike the proposed project or project variant, vehicles accessing the individual driveways on Euclid Avenue would cross the class II (westbound) bicycle lane on the north side of Euclid Avenue to enter/exit their private garages. In all other respects, streetscape changes would be similar to those under the proposed project and project variant, e.g., locations of other curb cuts (and driveways) and corner bulbouts. Thus, in comparison to the proposed project or project variant, under Alternative F bicycle accessibility to and through the site would be more limited.

Alternative F would generate fewer vehicle trips than the proposed project and project variant. As a result, changes in local traffic operations would not be as substantial as those under the proposed project and project variant. However, the presence of multiple driveways on Euclid Avenue would increase the potential for pullout, left cross and right hook conflicts between vehicles and bicyclists on Euclid Avenue compared to the proposed project and project variant. While the introduction of new curb cuts and site access points along Euclid Avenue and Laurel Street would increase the number of conflict locations compared with the proposed project and project variant, the number of vehicle trips at these curb cuts would be low (less than one vehicle trip during the peak hours). As such, queues would not develop, and vehicles would not block the bike lane or create hazardous conditions or accessibility impacts for bicyclists. Furthermore, given the low volume of bicyclists traveling on Euclid Avenue (less than 5 bicyclists observed during the peak hour) the probability of a conflicts is low. Thus, under Alternative F, as with the proposed project and project variant, the curb cuts and project driveways would not create hazardous conditions for bicyclists.

Under Alternative F, as with the proposed project and project variant, bicycle impacts associated with project-related hazardous conditions or interference with bicycle access to the site or adjoining areas would be less than significant. Similarly, implementation of Improvement Measure I-TR-3: Driveway Queue Abatement, p. 4.C.82, would further reduce the less-than-significant bicycle impacts.

Loading Impacts

FREIGHT LOADING

Alternative F would generate the same average and peak hour demand for five and six freight loading spaces, respectively, as the proposed project and project variant and would provide the same number of off-street freight loading spaces in the California Street and Masonic garages. As with the proposed project and project variant, the conversion of five on-street parking spaces to one 100-foot-long off-street commercial loading zone along California Street would be requested. As with the proposed project and project variant, under Alternative F, the proposed supply would meet demand and the freight loading impact would be less than significant. Similarly, implementation of Improvement Measure I-TR-9a: Schedule and Coordinate Deliveries and Improvement Measure I-TR-9b: Monitor Loading Activity and Implement Loading Management Strategies as Needed, pp. 4.C.97-4.C.98, would further reduce the less-than-significant freight loading impacts.

PASSENGER LOADING

Alternative F would generate 20 passenger drop-off/pick-up trips (9 drop-off, 11 pick-up) during the weekday a.m. peak period and 30 passenger drop-off/pick-up trips (17 drop-off, 13 pick-up) during the weekday p.m. peak period. This demand is equivalent to 40 linear feet (or 2 spaces) during the peak hour of demand. As with the proposed project or project variant, under Alternative F the project sponsor would seek the conversion of ten on-street parking spaces into three separate 60-foot-long passenger loading zones along Euclid Avenue, Laurel Street, and Masonic Avenue. Under Alternative F, passenger loading would also occur at the roundabout at the terminus of the Walnut Street extension; however, there would be no passenger loading associated with a daycare use as that use would not be developed under Alternative F, unlike the proposed project and project variant. As with the proposed project and project variant, under Alternative F the passenger loading supply would meet demand and the passenger loading impact would be less than significant.

Emergency Access Impacts

Under Alternative F emergency vehicles would continue to have access to the perimeter of the project site, and would be able to access the center of the site via the Walnut Street extension and the west end of Mayfair Walk. As with the proposed project and project variant, emergency access impacts would be less than significant.

Cumulative Impacts

As with the proposed project and project variant, Alternative F, in combination with past, present and reasonably foreseeable development in the project vicinity, would result in a less-than-significant cumulative construction-related transportation impact and less-than-significant

2040 cumulative impacts related to traffic hazards, transit, pedestrians, bicycles, loading, and emergency access.

The incremental effects of Alternative F on regional VMT would be significant, when viewed in combination with past, present, and reasonably foreseeable future projects and the goal to remain at or below 15 percent below the regional VMT average. As with the proposed project and project variant, Alternative F would contribute to this cumulative VMT impact as a result of the provision of retail parking supply substantially above the neighborhood parking rate for retail uses. Implementation of Mitigation Measure M-TR-2: Reduce Retail Parking Supply, p. 4.C.80, would reduce the proposed retail parking supply to a level that would not substantially increase VMT, resulting in a less-than-significant cumulative VMT impact. Therefore, like the proposed project and project variant, Alternative F with mitigation would not make a considerable contribution to cumulative increases in VMT.

Parking Discussion

As with the proposed project or project variant, a reduction in the number of on-street vehicle parking spaces would occur under Alternative F. Overall, there would be a net reduction of 59 on-street parking spaces under Alternative F (23 more than under the proposed project or project variant). This increase would be primarily attributable to the introduction of curb cuts along Euclid Avenue and Laurel Street. Additionally, Alternative F would provide 156 fewer parking spaces than the proposed project and 230 fewer spaces than the project variant.

NOISE AND VIBRATION

Under Alternative F the existing office building would be retained and adaptively reused for residential uses as described for the proposed project or project variant with the major differences being that Alternative F would not separate the building into two buildings and would not include a vertical addition. Under Alternative F, the Plaza A, Plaza B, and Walnut buildings would be developed as under the proposed project and project variant, but with shorter heights and a predominantly residential program. The footprint for the California Street Garage would be the same as under the proposed project or project variant. The Mayfair Building and associated below-grade parking garage would not be constructed; however, development along Laurel Street would occur with eleven Laurel Duplexes, compared to seven duplexes under the proposed project or project variant. Under Alternative F, the Euclid Building would be developed with a smaller footprint in order to provide the required setback from the ten new Euclid Duplexes along Euclid Avenue and the eleven Laurel Duplexes along Laurel Street. The Laurel and Euclid duplexes would each include below grade private parking garages. As with the proposed project or project variant, under Alternative F the Masonic Building would be constructed with the associated Masonic Garage developed underneath the Masonic and Euclid buildings; however, the footprint of the Masonic Garage would be smaller than that under the proposed project or project variant. Thus, under Alternative F excavation and site disturbance would be similar to the proposed project and project variant because development would occur on much of the project site (see Figure 6.16, p. 6.179, and Figure 2.22, p. 2.62). Under Alternative F land uses in all new buildings would be limited to residential uses except for the Plaza A Building, which would include ground-floor retail uses.

Construction Noise

The construction program under Alternative F would be the same as the proposed project or project variant (7 years), although it could expand to up to 15 years as discussed for the proposed project or project variant. The type of construction equipment and use characteristics would not change because demolition, excavation, and construction activities would still occur and would be similar to those of the proposed project or project variant. As with the proposed project or project variant, there would be overlapping construction phases under Alternative F that would result in the occupancy of a new and/or renovated building from a previous phase by future residents.

The temporary construction-related noise impacts of Alternative F would affect the same off-site sensitive receptor locations along California Street, Euclid Avenue, and Laurel Street as the proposed project or project variant. With a phased construction program similar to that for the proposed project or project variant, the number of temporary, construction-related noise events that could affect off-site sensitive receptor locations would be similar to or the same as under the proposed project and project variant. Similar construction activities would occur under Alternative F, using similar equipment such as excavators and hoe rams to facture and remove bedrock as part of excavation; thus, the potential to generate substantial temporary noise increases at off-site receptor locations would remain with this alternative because the proximity of construction activities, the nature of the construction activities, and the potential for encountering bedrock would not change. Construction noise impacts on off-site sensitive receptors under Alternative F would be significant.

As identified for the proposed project or project variant, temporary construction-related noise impacts at on-site sensitive receptor locations (see Impact NO-1, pp. 4.D.47-4.D.49) would be noticeable with construction noise increases from the simultaneous use of the loudest construction equipment generating noise levels of up to 80 dBA at the Euclid Building, which would be occupied (along with the Masonic Building and Euclid Duplexes) during the construction activities associated with the adaptive reuse of the existing structure, the construction of the California Street buildings, and the construction of the Laurel Duplexes (see Table 4.D.14, p. 4.D.48). As with the proposed project or project variant, construction activities under Alternative F could generate a persistent noise increase of 10 dBA or greater above ambient levels at the on-site sensitive receptors. Construction noise impacts on on-site sensitive receptors under Alternative F would be significant.

Implementation of Mitigation Measure M-NO-1: Construction Noise Control Measures (see pp. 4.D.42-4.D.43) would be required. Although the construction noise reduction strategies identified under Mitigation Measure M-NO-1 would not reduce the construction noise impact at off-site and on-site sensitive receptor locations to a less-than-significant level, it would further reduce the less-than-significant noise impacts related to compliance with local standards for construction noise from non-impact equipment.

With a similar construction program and construction schedule, there would be roughly the same haul, concrete, and delivery truck trips) with Alternative F as with the proposed project or project variant. Any incremental change in the number of construction truck trips would likely not be substantial enough to alter the temporary increase to ambient noise levels expected for the number of haul/concrete/delivery truck trips under the proposed project or project variant. Thus, under Alternative F, construction-related noise attributable to construction truck traffic on local roadways would be similar to that for the proposed project or project variant, and, like the proposed project or project variant, would be a less-than-significant impact.

Construction Vibration

Under Alternative F, as with the proposed project or project variant, construction activities that generate groundborne vibration would occur, e.g., the use of excavators and vibratory rollers, and the potential for structural damage to adjacent structures would remain. Thus, under Alternative F, as with the proposed project or project variant, construction-related groundborne vibration impacts on the SF Fire Credit Union building would also be significant and implementation of Mitigation Measure M-NO-2: Vibration Monitoring Program for the SF Fire Credit Union Building (see pp. 4.D.55-4.D.56) would be required. With implementation of Mitigation Measure M-NO-2 the significant impact on the SF Fire Credit Union building under Alternative F would be reduced to a less-than-significant level, as with the proposed project or project variant.

Operational Noise

Stationary Equipment

Under Alternative F, the emergency diesel generator that serves the existing office building would be relocated from the easternmost circular garage ramp at Basement Level 1 to Basement Level B1 of the Masonic Garage, as under the proposed project and project variant. HVAC equipment for the Plaza A, Plaza B, Walnut, Euclid and Masonic buildings as well as the Laurel and Euclid duplexes would be located on the rooftops. As with the proposed project or project variant, Mitigation Measure M-NO-3: Stationary Equipment Noise Controls (see p. 4.D.60) would still be required under Alternative F for rooftop equipment to ensure that proper enclosures or other sound muffling measures would be implemented to meet regulatory requirements established in the Noise Ordinance. Therefore, like the proposed project or project variant, under Alternative F this impact would be mitigated to a less-than-significant level with implementation of Mitigation Measure M-NO-3.

Traffic

As shown in Table 6.13, p. 6.188, Alternative F would generate 3,295 fewer vehicle trips per weekday than the proposed project and 3,279 fewer vehicle trips per weekday than the project variant (an approximately 57 percent reduction relative to the proposed project's or project variant's vehicle trips). During the weekday p.m. peak period Alternative F would generate 364 fewer vehicle trips than the proposed project and 416 fewer vehicle trips than the project variant. Under the proposed project or project variant traffic noise increases of 1 dBA or less were identified, and the impact was determined to be less than significant (see Impact NO-4, pp. 4.D.62-4.D.64). With less traffic generated under Alternative F, any incremental increase in traffic noise along affected streets would also be less than significant.

Land Use Compatibility

Like the proposed project or project variant, Alternative F would result in the introduction of new residential land uses along California and Laurel streets and Euclid and Masonic avenues. Unlike the proposed project or project variant, there would be one less new multi-family residential building developed along the perimeter of the site; but 14 more duplexes. Alternative F would have similar noise compatibility concerns with future noise levels as those identified for the proposed project or project variant, which were determined to be less-than-significant impacts (see Impact NO-5, pp. 4.D.64-4.D.67).

Cumulative Impacts

Since construction-related noise and vibration impacts under Alternative F would be similar to those of the proposed project or project variant, construction-related cumulative noise impacts under Alternative F in combination with noise from construction of other nearby projects expected during the buildout period for the alternative would continue to be less than significant (see Impact C-NO-1, pp. 4.D.68-4.D.70). Under 2040 cumulative conditions with the proposed project or project variant, traffic noise increases of 2 dBA or less were identified, and the cumulative impact was determined to be less than significant (see Impact C-NO-2, pp. 4.D.71-4.D.72). Thus, any incremental increase in traffic noise levels along affected local streets associated with cumulative growth plus the reduced land use program for Alternative F, which would generate less traffic than the proposed project or project variant, would also have a less-than-significant cumulative impact.

AIR QUALITY

Under Alternative F, there would be slightly less demolition, construction, and ground disturbance than under the proposed project or project variant but more than any of the other project alternatives. Along the northern portion of the project site demolition, construction, and ground disturbance would be similar to that under the proposed project or project variant; however, along the western and southern portions it would be slightly more limited because of the smaller footprints for below-grade parking garages.

Changes to the existing building at the center of the site and development of the 26 new building along the perimeter of the site would result in a reduction in the total gross square feet of floor area under the proposed project or project variant (approximately 14 and 20 percent less, respectively).

As with the proposed project or project variant, under Alternative F the emergency diesel generator and electrical substations in Basement Levels B1 and B2 of the existing parking garage, and the boilers, chillers and other equipment in the annex building would be removed as part of the demolition of the circular garage ramp structures and annex building, respectively. The emergency diesel generator would be relocated within the Basement Level B1 of the Masonic Garage, as under the proposed project and project variant. New emergency generators would not be sited at any other locations on the project site.

Construction would be completed in 7 to 15 years with construction overlap related to the demolition, excavation, foundation and exterior and finishing components of the standard construction process as well as the overlap of phases. The construction program would be similar to that for the proposed project or project variant. Thus, under Alternative F, as with the proposed project or project variant, there would be on-site sensitive receptors on the project site during construction of a subsequent phase and, use of on-site equipment that contribute to area source emissions, e.g. emergency diesel generator.

Construction

As described under Impact AQ-1, pp. 4.E.47-4.E.49, estimated construction-related emissions for criteria air pollutants for the proposed project or project variant would not exceed the applicable construction-related significance thresholds for reactive organic gases, nitrogen oxides, and particulate matter. Thus, under the slightly more limited construction program of Alternative F and a similar construction schedule, the average daily construction-related criteria air pollutant emissions would be similar to, or incrementally reduced from, those of the proposed project or project variant, and, like the proposed project or project variant, would also be a less-than-significant impact. This assumes construction emissions are directly proportional to new gross square footage.

Operations

As described under Impact AQ-2, pp. 4.E.49-4.E.52, the air quality impacts associated with estimated operational emissions for criteria air pollutants for the proposed project or project variant would not exceed the applicable significance thresholds for reactive organic gases, nitrogen oxides, and particulate matter. The alteration to the mix of land uses under Alternative F and the resultant maximization of residential uses under Alternative F would increase the number of new and renovated buildings on the site; however, overall square footage would be reduced compared to the proposed project and project variant. This would result in a lower number of area and building energy sources of emissions. Alternative F would also generate fewer vehicle trips and thus lower mobile emissions, which make up the majority of operational NOx and PM emissions. As shown in Table 6.13, p. 6.188, Alternative F would generate 3,295 fewer vehicle trips per weekday than the proposed project and 3,279 fewer vehicle trips per weekday than the project variant (an approximately 57 percent reduction relative to the proposed project's or project variant's vehicle trips). As a result, the average daily criteria air pollutant emissions attributable to project operations under Alternative F would be reduced in comparison to the proposed project or project variant, and, like the proposed project or project variant, would also be a less-than-significant impact.

Toxic Air Contaminants

Similar to the proposed project or project variant, construction and operation of Alternative F would generate toxic air contaminants, including diesel particulate matter. Under Alternative F, a new and larger emergency diesel generator would replace the existing one and would be located in Basement Level B1 of the Masonic Garage as under the proposed project or project variant. Thus, under Alternative F, as with the proposed project or project variant, the same amount of diesel particulate matter associated with the use and/or regular monthly testing of the emergency diesel generator would be emitted. Because the generator would be located in the same location under this alternative as the proposed project and project variant, the location of the maximally exposed individual sensitive receptors would remain the same. As noted above, Alternative F would generate approximately 57 percent fewer vehicle trips than the proposed project or project variant. Thus, under the slightly reduced construction program and the altered land use program of Alternative F, slightly less construction and operational $PM_{2.5}$ and diesel particulate matter emissions would be generated than under the proposed project or project variant. As with the proposed project or project variant, project contributions under Alternative F, when added to background values, would not exceed $PM_{2.5}$ concentration and excess cancer risk thresholds and result in a significant health risk impact at the maximally exposed off-site and on-site individual receptors. As with the proposed project or project variant, annual average $PM_{2.5}$ contributions would be almost all from background, and excess cancer risk values would be well below thresholds (see Table 4.E.10, p. 4.E.58). Therefore, toxic air contaminant emissions attributable to project construction and operations under Alternative F would be similar to, or slightly reduced from, those for the proposed project or project variant, and, like the proposed project or project variant, would not result in off- or on-site sensitive receptor locations meeting the Air Pollutant Exposure Zone criteria for annual average $PM_{2.5}$ concentrations and excess cancer risk and would be less than significant.

Consistency with Clean Air Plan

As with the proposed project, project variant, and the full and partial preservation alternatives impacts related to consistency with the *2017 Bay Area Clean Air Plan* for Alternative F would be less than significant. Under Alternative F there would be fewer vehicle trips and the existing emergency diesel generator would be replaced with a newer but slightly larger model (as with the proposed project and project variant), resulting in fewer overall emissions. As with the proposed project or project variant (see Impact AQ-4, pp. 4.E.60-4.E.65), Alternative F would support the primary goals of the *2017 Bay Area Clean Air Plan* and would implement all applicable control measures; would develop a transportation demand management program to promote the use of transit, walking and bicycling as viable options to privately owned vehicles; would pay a fair share contribution to the SFMTA to improve local bus service (see Mitigation Measure M-TR-4, pp. 4.C.87-4.C.88), and would include car-share parking, unbundled parking, and electric vehicle charging stations to ensure consistency with applicable transportation control measures contained in the *2017 Bay Area Clean Air Plan*. Therefore, Alternative F would not conflict with, or obstruct implementation of the *2017 Bay Area Clean Air Plan*, and this impact, as with the proposed project or project variant, would be less than significant.

Odors

Although there may be some potential for small-scale, localized odor issues around the construction site or the proposed site uses under Alternative F, e.g., from construction site activities and solid waste collection, substantial odor sources and consequent effects on sensitive receptors would be unlikely. Therefore, like the proposed project or project variant, Alternative F would not create objectionable odors that would affect a substantial number of people.

Cumulative Air Quality Impacts

As explained for the proposed project and project variant (see Impact C-AQ-1, p. 4.E.66), the contribution of a project's individual air pollutant emissions to regional air quality impacts is, by its nature, a cumulative effect. As with the proposed project or project variant, the cumulative air quality impacts of Alternative F would be less than significant.

Although Alternative F would generate fewer vehicle trips, would replace the emergency diesel generator for the existing office building with a new but larger emergency diesel generator, and would not require emergency diesel generators for any new buildings, Alternative F would result in a similar cumulative health risk impact, but slightly reduced compared to that of the proposed project or project variant, which was determined to be less than significant. As discussed for the proposed project or project variant, 2040 cumulative heath risk modeling is based on growth projections that would have reasonably accounted for the traffic emissions from the reasonably foreseeable projects listed in Section 4.A, Introduction to Chapter 4, pp. 4.A.7-4.A.13. That modeling shows future background risks are projected to be reduced in 2040 at some receptors compared to existing conditions (2014 risks) as a result of improved vehicle fleets. The higher 2014 background risks were used as the worst-case scenario for each receptor and were combined with the proposed project's or project variant's contribution. As with the proposed project or project variant, the addition of the health risks associated with Alternative F, which would be similar to, or slightly less than, that for the proposed project or project variant, to the worst-case background risks would also not exceed thresholds and result in the expansion of mapped Air Pollution Exposure Zones that otherwise would not. Thus, under Alternative F, as with the proposed project or project variant, cumulative construction and operational related air quality impacts would be less than significant, and mitigation would not be needed.

INITIAL STUDY TOPICS

Land Use and Planning

Alternative F would be a new residential development within an existing city block and would not conflict with applicable land use plans, policies, regulations. Mayfair Walk would be developed but the north-south Walnut Walk would not. Therefore, Alternative F would provide less integration with the surrounding neighborhood than the proposed project or project variant. In all other respects, Alternative F would have the same or similar less-than-significant project-level impacts as described for the proposed project or project variant (see Topic E.1, Land Use and Planning, of the initial study in EIR Appendix B, pp. 110-112), and would not combine with other cumulative land use changes in the vicinity to create a significant cumulative impact related to land use and planning.

Population and Housing

Under Alternative F, there would be approximately 1,422 new residents on the project site, about 161 more than the proposed project but 259 fewer than the project variant. The existing office uses would be removed and all UCSF employees would relocate to other UCSF facilities. Alternative F would have fewer employees with limited retail use and no office or daycare center uses and would not generate a substantial increase in the daytime population. Like the proposed project or project variant, which would have less-than-significant population and housing impacts as described in Topic E.2, Population and Housing, of the initial study, Alternative F, with a similar population increase, would not induce substantial population growth in relation to citywide growth forecasts and would not displace any existing housing units or current on-site employees. As such, Alternative F would have less-than-significant project-level impacts and would not combine with cumulative projects in the vicinity or citywide level to generate a significant cumulative impact related to population and housing.

Cultural Resources - Archaeological Resources

Alternative F would have substantially the same project-level and cumulative impacts on archaeological resources (including human remains and tribal cultural resources) as those for the proposed project or project variant because excavation and site disturbance would be substantially the same and would occur in areas with a high potential for encountering archaeological resources. Thus, Mitigation Measure M-CR-2a: Archaeological Testing, Monitoring, Data Recovery and Reporting, Mitigation Measure M-CR-2b: Interpretation, and Mitigation Measure M-CR-4: Tribal Cultural Resources Interpretive Program, identified for the proposed project and project variant on initial study pp. 129-133 and p. 135, would also be applicable to Alternative F. Similarly, implementation of the mitigation measure would reduce Alternative F's project-level impact on archaeological resources to a less-than-significant level, and its contribution to the identified significant cumulative impact related to subsurface archaeological resources associated with the Laurel Hill Cemetery to less than considerable.

Greenhouse Gas Emissions

Excavation and ground disturbance under Alternative F would be substantially the same, or incrementally greater, than that for the proposed project and project variant. More of the existing building would be retained and 26 new buildings (5, 4-story buildings and 21, 4-story, duplexes) would be constructed. Overall, Alternative F would include approximately 14 percent less floor area than the proposed project (20 percent less than the project variant). Therefore, Alternative F would result in substantially similar construction and operation-related greenhouse gas emissions compared to the proposed project or project variant. Compliance with applicable regulations would ensure that Alternative F would be consistent with the City's GHG Reduction Strategy as well as regional and state plans and policies related to GHG emissions reduction efforts (see Topic E.7, Greenhouse Gas Emission, of the initial study, pp. 146-150). With residential uses, limited retail uses, and no daycare or office uses compared to the proposed project or project variant, vehicle trips would be reduced. With implementation of Mitigation Measure M-TR-2, p. 4.C.80, Alternative F would also reduce its retail parking supply to be substantially the same as the neighborhood parking rate to ensure that project-related VMT would not rise above the average VMT for TAZ 709. Thus, operational-related GHG emissions associated with mobile sources would similar to, or less than mobile source emissions from the proposed project or project variant. As with the proposed project or project variant, project-level and cumulative GHG impacts of Alternative F would be less than significant.

Wind and Shadow

Under Alternative F, the building footprints of the Plaza A, Plaza B, and Walnut buildings would be the same as that for the proposed project or project variant; however, the heights would be 40 feet (shorter than under the proposed project or project variant). The height of the retained building would remain at 55 feet 6 inches (shorter than under the proposed project or project variant). Along Laurel Street, the Mayfair Building would not be constructed. Instead, eleven 37- to 40-foot-tall Laurel Duplexes would occupy the Laurel Street full frontage (four more than under the proposed project or project variant). Unlike the proposed project or project variant, ten 40-foot-tall Euclid Duplexes would be developed along Euclid Avenue. As with the proposed project or project variant, the Masonic and Euclid buildings would be developed as 40-foot-tall buildings however the Euclid Building would have a smaller footprint than under the proposed project or project variant.

Wind

As with the proposed project or project variant, under Alternative F wind conditions along the public sidewalks on California and Laurel streets would be altered. Due to the decreased height of the Plaza A Building, public sidewalks on California and Laurel streets near the Plaza A Building, near building corners, near the Laurel Street/California Street and Laurel Street/Mayfair Drive intersections, and the Mayfair Walk pedestrian site access point would be similar to, but slightly less pronounced than, those described for the proposed project or project variant. The channelizing effect on wind conditions along California Street would also be slightly less pronounced because the building heights would be similar to those of the upwind structures on the north side of California Street which range in height from 40 to 65 feet from the west to east).

Under Alternative F, wind conditions along Laurel Street would be similar to, but slightly more pronounced than, those described for the proposed project or project variant due to the slight increase in the number of structures on the perimeter of the west property line, i.e., four more Laurel Duplexes and one less multi-family building (the Mayfair Building). As with the proposed project or project variant, the 11 Laurel Duplexes would not be taller than upwind structures and would not capture and channelize a substantial amount of wind along Laurel Street. Furthermore, the Laurel Duplexes would not form a solid horizontal mass; thus, as with the proposed project or project variant, prevailing winds from north and west would flow over or through building interstices. However, with a greater number of structures occupying the full length of Laurel Street, winds at the Laurel Street/Euclid Avenue intersection may be more noticeable with winds accelerating around the corner of the southernmost structure.

Under Alternative F, wind conditions along Euclid Avenue would be similar to, but slightly more pronounced than, those described for the proposed project or project variant due to the introduction of new structures on the perimeter of the south property line, i.e., ten Euclid

Duplexes rather than a proposed open space (Euclid Green). The ten Euclid Duplexes would not be taller than upwind structures; thus, the potential to capture and redirect substantial winds to the ground level would be minimal. Channelizing effects along public sidewalks along Euclid Avenue would also be minimal due to the width of the public right-of-way (80 feet) and the presence of backyards along the south side of Euclid Avenue. However, with the presence of structures along Euclid Avenue south of Laurel Street, winds at the Laurel Street/Euclid Avenue intersection may be more noticeable with winds accelerating around the corners of the westernmost structure along Euclid Avenue and the southernmost structure along Laurel Street. Wind conditions at all other locations (public sidewalks on Masonic and Presidio avenues) would be similar to those under the proposed project or project variant.

Thus, due to the altered building program that would result in the development of a greater number of structures on the perimeter of the site and with consideration of the decreased height of the Plaza A, Plaza B, and Walnut buildings along California Street, any changes to wind speeds on adjacent public sidewalks and public use areas attributable to Alternative F, like those attributable to the proposed project or project variant, would not be substantial enough to contribute to an exceedance of the wind hazard criterion. Therefore, as with the proposed project or project variant, wind impacts under Alternative F would be less than significant and the alternative would not combine with cumulative projects in the vicinity of the project site to generate a significant cumulative wind impact.

Shadow

Under Alternative F, building heights along California Street and at the center of the site would be lower. Unlike the proposed project or project variant, there would be more structures developed along the edges of Laurel Street and Euclid Avenue. The Laurel Hill Playground, west of the project site on Collins Street, is approximately 385 feet west of the intersection of Euclid Avenue and Laurel Street. The 40-foot-tall duplexes along Laurel Street and Euclid Avenue would not cast new shadow that would reach the Laurel Hill Playground due to distance, topography, and the presence of intervening structures. Thus, as with the proposed project or project variant, shadow would not reach the Laurel Hill Playground, nor would it reach the Presidio Heights Playground (between Walnut and Laurel Streets along Clay Street, approximately 530 feet north of the project site's California Street property line). The shadowing of public sidewalks would be more extensive under Alternative F because 13 more buildings would be constructed along the perimeter of the site. Therefore, as with the proposed project or project variant, shadow impacts under Alternative F would be less than significant and would not combine with cumulative projects in the vicinity of the project site to result in a significant cumulative shadow impact.

Recreation

Alternative F would introduce 1,422 new residents to the project site, about 161 more than the proposed project but 259 fewer than the project variant. Alternative F would include common and private open space to accommodate the new residential use but would have a larger development footprint than the proposed project and project variant. As such less of the site would be developed as open space. Under this alternative, the existing office uses would be removed, no new office space would be added, and less retail space would be built; therefore, this alternative would have a smaller daytime worker population on site than under the proposed project or project variant.

Alternative F, with a slightly reduced daytime population (residents plus workers) compared to the proposed project or project variant, would not increase the use of recreational facilities such that physical deterioration of the facilities would be accelerated, would not require construction of new or expanded recreational facilities, and would not physically degrade existing recreational resources. As such, impacts under Alternative F would be similar to those described in Topic E.9, Recreation, of the initial study for the proposed project or project variant. Thus, Alternative F would have less-than-significant project-level impacts, and would not combine with cumulative projects in the vicinity of the project site to generate a significant cumulative impact related to recreation.

Utilities and Service Systems

Similar to the proposed project and project variant, development under Alternative F would trigger the requirements of the City's Stormwater Management Requirements and Design Guidelines, and stormwater flows to the combined sewer system would be reduced by 25 percent. As discussed above under Population and Housing for this alternative there would be more residents than under the proposed project but fewer than under the project variant. Water or wastewater demand under Alternative F would increase relative to existing conditions but would be less than that evaluated under the project variant, because there would be fewer residents than under the project variant and fewer on-site workers than under either the proposed project or project variant. Because the wastewater flows under Alternative F would be less than under the proposed project or project variant, the flows would remain within the capacity of the Southeast Water Pollution Control Plant. Like the proposed project or project variant, compliance with federal, state, and local statutes and regulations related to solid waste would limit impacts on landfills.

Thus, impacts on utilities and service systems under Alternative F would be similar to those described for the proposed project or project variant in Topic E.10, Utilities and Service Systems, of the initial study (pp. 173-188). Similarly, Alternative F would have less-than-significant project-level impacts, and would not combine with cumultive projects in the vicinity of the project site or at the citywide level to generate a significant cumulative impact related to utilities and service systems.

Public Services

As discussed above under Population and Housing on p. 6.202, Alternative F would introduce 1,422 new residents to the project site, about 161 more than the proposed project but 259 fewer than the project variant; the existing office uses would be removed; and less new retail space and no daycare center space would be developed. Like the proposed project and project variant, which would have less-than-significant public services impacts as described in Topic E.11, Public Services, of the initial study, and in Section 4.F, Initial Study Supplement (for schools), pp. 4.F.14-4.F.17, this alternative, with a similar scale of development, would have less-than-significant project-level impacts, and would not combine with cumulative projects in the vicinity of the project site or at the citywide level to generate a significant cumulative impact related to public services.

Biological Resources

Compared with the proposed project or project variant, Alternative F would have a similar potential for impacts on biological resources due to the incrementally greater development of the site. A total of 37 protected trees on and adjacent to the project site would be removed, 3 more than with the proposed project or project variant. Under this alternative, a similar number of other onsite trees would be removed. Thus, implementation of Mitigation Measure M-BI-1: Preconstruction Nesting Bird Surveys and Buffer Areas, in the initial study, pp. 200-201, would also be required for Alternative F to reduce potentially significant impacts on nesting birds. Alternative F would include 26 new buildings up to 40 feet in height, compared to 40 to 67 feet under the proposed project and project variant. There would be no sky bridge or vertical addition on the retained building. However, exterior alterations would include window replacement. These modifications would be potential obstacles for resident or migratory birds. Similar to the proposed project and project variant, the application of bird-safe glazing treatments (as outlined in Planning Code Section 139) would be required for all building feature-related hazards to ensure bird safety. Unlike the proposed project or project variant the glazing treatments would be historically appropriate. As with the proposed project and project variant, Alternative F would comply with the Urban Forestry Ordinance.

Like the proposed project and project variant, which would have less-than-significant biological resources impacts with mitigation, as described in Topic E.12, Biological Resources, of the initial study (pp. 197-204), Alternative F, with mitigation, would not have project-level impacts, and would not combine with cumulative projects in the vicinity of the project site to create a significant cumulative impact related to biological resources.

Geology and Soils

Alternative F would involve more soil disturbance from excavation with a slightly expanded development footprint compared to the proposed project and project variant. Similar to the proposed project and project variant, new development under Alternative F would be required to comply with the building code standards to reduce seismic hazards. Because the extent of soil disturbance would be similar to the proposed project or project variant, the potential for soil erosion, change in site topography, creation of unstable slopes, and disturbance of paleontological resources would be similar, for which impacts related to these topics would be less than significant or less than significant with mitigation. Similar to the proposed project and project variant, implementation of Alternative F would require mitigation in the event of inadvertent discovery of paleontological resources (see Mitigation Measure M-GE-5: Inadvertent Discovery of Paleontological Resources, pp. 214-215 in Topic E.13, Geology and Soils of the initial study).

Like the proposed project and project variant, Alternative F would comply with the requirements of the building code and therefore would not expose people or structures to seismic risks. Similarly, Alternative F , with mitigation, would not result in substantial soil erosion or the loss of topsoil, would not be located on a geologic unit or soil that is unstable, and would not substantially change the topography or any unique geologic or physical features of the site, including paleontological resources. As such, project-level impacts would continue to be less-than-significant with mitigation, and Alternative F would not combine with cumultive projects to create a significant cumulative impact related to geology and soils.

Hydrology and Water Quality

Alternative F would increase the development footprint compared to the proposed project or project variant resulting in slightly greater ground disturbance. Like the proposed project and project variant, under Alternative F erosion and sediment control and stormwater pollution prevention plans would be required. Thus, Alternative F would have similar construction-related water quality impacts when compared to the proposed project or project variant, for which impacts would be less than significant. The wastewater demands under Alternative F would increase relative to existing conditions but would be less than under the proposed project or project variant, a less-than-significant impact. Therefore, as described in Topic E.14, Hydrology and Water Quality, of the initial study, pp. 216-227, for the proposed project and project variant, Alternative F, with a similar scale of development, would have less-than-significant project-level impacts, and would not combine with cumulative projects in the vicinity or at the citywide level to create a significant cumulative impact related to hydrology and water quality.

Hazards and Hazardous Materials

Under Alternative F the demolition, excavation, and construction program and development footprint would be similar to that for the proposed project and project variant. The existing annex building would be demolished. The existing office building would be retained with more limited demolition needed for its adaptation for residential use compared to the proposed project or project variant due to the fact that the existing building would not be separated into two structures.

Alternative F would involve the removal of hazardous building materials and soils as with the proposed project or project variant. The volume of demolished building materials and excavated soils classified as hazardous waste, and the potential to encounter naturally occurring asbestos would be the same as described for the proposed project or project variant in Topic E.15, Hazards and Hazardous Materials, of the initial study, pp. 227-240, as supplemented in EIR Section 4.F. Alternative F would be subject to the same regulatory requirements associated with the routine handling, transport, and disposal of hazardous materials, and the project sponsor would be required to create and implement a site mitigation plan, construction dust control plan, and asbestos dust control plan. For these reasons, as with the proposed project or project variant, hazardous materials impacts under Alternative F would be less than significant. Furthermore, as described for the proposed project or project variant, Alternative F would likely exhibit the same level of operational risk as the proposed project or project variant with regard to the use of common household and commercial hazardous materials.

Access to the site perimeter and into the site would be similar to the proposed project and project variant (i.e., Walnut Street extension and Mayfair Walk). Therefore, like the proposed project or project variant, Alternative F would not interfere with an adopted emergency response plan or emergency evacuation plan and the impact would be less than significant.

As such, Alternative F would have less-than-significant project-level impacts, and would not (in combination with the same set of cumulative projects) generate a significant cumulative impact related to hazards and hazardous.

Mineral and Energy Resources

Like the proposed project or project variant, as described in Topic E.16, Mineral and Energy Resources, of the initial study, pp. 242-245, there are no known mineral resources within the project site. Similarly, Alternative F, with a slightly reduced construction and development programs, would not involve large amounts of fuel, water, or energy use or use them in a wasteful manner. Similar to the proposed project and project variant, Alternative F would have no impact on a mineral resource, and the potential energy resources impacts related to construction and operation of Alternative F would be less than those of the proposed project or project variant. As such, Alternative F would not have any significant project-level impacts, and would not combine with other cumulative projects in the vicinity (or at the citywide or regional level) to generate a significant cumulative impact related to mineral and energy resources.

Agricultural and Forest Resources

Similar to the proposed project and project variant, there would be no impacts related to agricultural and forest resources under Alternative F.

CONCLUSION

Although the existing historic structure at 3333 California Street would be partially retained and demolition would be limited compared to the proposed project or project variant, when considered together with the full development of the site, Alternative F would not reduce the significant impact on the historic resource to a less-than-significant level. Changes to the existing office building would not be as substantial as those under the proposed project or project variant (no vertical addition and no building separation) but more of the historic site and landscape would be removed (open area along Euclid Avenue). On balance the historic resource impacts of Alternative F would be similar to those of the proposed project or project variant. As with the proposed project or project variant, Alternative F would materially impair the property's ability to convey its historic and architectural significance, and Mitigation Measures M-CR-1a and M-CR-1b would be required. Similarly, implementation of mitigation measures would not reduce the significant and unavoidable impact on the historic architectural resource. Like the proposed project or project variant, Alternative F would generate significant and unavoidable impacts related to transit capacity and construction noise. With regard to VMT (retail parking supply), construction vibration (damage to off-site structures), and operational noise (stationary sources), impacts would be less than significant with mitigation, the same as under the proposed project or project variant. As with the proposed project or project variant, air quality impacts under Alternative F would be less than significant. Under Alternative F no other significant impacts beyond those identified in the initial study for the proposed project or project variant, e.g. archaeological resources (including impacts related to human remains and tribal cultural resources), biological resources, and paleontological resources would occur. The same mitigation measures identified in the initial study for the proposed project and project variant would also be applicable to Alternative F, and impacts would be reduced to less-than-significant levels.

H. ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Pursuant to CEQA Guidelines section 15126.6(e)(2), if the No Project Alternative is the environmentally superior alternative, then an EIR is required to identify another environmentally superior alternative from among the alternatives evaluated if the proposed project or project variant has significant impacts that cannot be mitigated to a less-than-significant level. The environmentally superior alternative is the alternative that best avoids or lessens any significant effects of the proposed project, even if the alternative would impede to some degree the attainment of the project objectives. Alternative A: No Project Alternative is considered the overall environmentally superior alternative, because it would not result in the significant impacts associated with implementation of the proposed project or project variant. Alternative A, however, would not meet any of the objectives of the project sponsor.

COMPARISON OF SIGNFICANT IMPACTS OF THE PROPOSED PROJECT, PROJECT VARIANT, AND EIR ALTERNATIVES

To identify the environmentally superior alternative in accordance with CEQA Guidelines, Table 6.4, pp. 6.21-6.22, presents a comparison of the significant impacts of the proposed project and project variant to those of the alternatives, as well as the comparative effects amongst the alternatives. The proposed project or project variant would result in significant impacts related to historic architectural resources, transportation and circulation, and noise and vibration.

As shown in Table 6.4, Alternative A: No Project Alternative would represent a continuation of existing conditions on the project site and would not result in any significant impacts.

The two full preservation alternatives (Alternatives B and C) and the two partial preservation alternatives (Alternatives D and E) would each retain more of the character-defining features of the existing building and surrounding site and landscape than the proposed project or project variant would. However, only the two full preservation alternatives would reduce the significant and unavoidable impact on the historic architectural resource to a less-than-significant level. The two partial preservation alternatives would reduce the impact, but not to a less-than-significant level. Although Alternative F would retain more of the existing office building than the proposed project or project variant, more of the site would be developed with new buildings necessitating removal of more contributing site and landscape features. Thus, impacts related to historic resources under Alternative F would be comparable in degree to those identified for the proposed project and project variant.

As shown in Table 6.1, pp. 6.13-6.15`, each of the project alternatives except for Alternative D would provide less parking than the proposed project or project variant, although any of the alternatives could ultimately be approved with less parking without substantially affecting the results of the analysis. As shown in Table 6.2, p. 6.16, the parking programs for Alternatives B and D would be provided at a similar parking rate as that in the neighborhood for the various proposed land uses. Thus, Alternatives B and D would reduce this significant impact of the proposed project or project variant without mitigation. Alternatives C, E, and F would each provide parking programs with retail parking supplies substantially above the neighborhood parking rate for that land use.

Thus, with different land use programs and trip generation, as well as different parking programs, Alternative B with no retail uses and Alternative D with less square footage of retail uses would reduce the significant VMT impact related to the provision of retail parking substantially above the neighborhood parking rate[31] and would not require implementation of Mitigation Measure M-TR-2: Reduce Retail Parking Supply, p. 4.C.80. With implementation of Mitigation Measure M-TR-2, Alternatives C, E, and F would reduce the impacts to less-than-significant levels, similar to the proposed project or project variant. Each of the alternatives would result in a significant and unavoidable transit impact that could be reduced with implementation of Mitigation Measure M-TR-4: Monitor and Provide Fair Share Contribution to Improve 43 Masonic Capacity, pp. 4.C.87-4.C.88, but not to a less-than-significant level.

Alternatives B through D would have reduced construction durations, reduced site disturbance, and reduced construction programs compared to the proposed project or project variant, with intensity of development increasing progressively under each alternative. These differences would thereby reduce the overall number of adverse noise events and duration of the significant and unavoidable construction-related noise impact but would not reduce this impact to a less-than-significant level even with implementation of Mitigation Measure M-NO-1: Construction Noise Controls, pp. 4.D.42-4.D.43. Alternatives E and F would have virtually the same construction-related noise impacts as the proposed project or project variant because the construction duration, site disturbance, and construction programs would not be substantially different. Although Alternative B would not eliminate the significant and unavoidable construction-related noise impact of the proposed project or project variant it would reduce the duration of the impact because it has the most limited construction program and the shortest construction duration of all alternatives except for Alternative A, No Project.

Alternative B would not have a construction-related vibration impact and would not require mitigation; thus, reducing a significant impact of the proposed project or project variant. However, each of the other alternatives, as with the proposed project or project variant would require mitigation. Thus, Alternatives C through F would reduce the construction-related vibration impact to less-than-significant levels with implementation of Mitigation Measure M-NO-2: Vibration Monitoring Program for SF Fire Credit Union Building, pp. 4.D.55-4.D.56.

Alternatives B through F, as with the proposed project or project variant, would site stationary equipment on new buildings and renovated buildings. In order to ensure that regulatory requirements established in the Noise Ordinance would not be exceeded each alternative would be required to implement Mitigation Measure M-NO-3: Stationary Equipment Noise Controls, p. 4.D.60, to reduce operational noise.

Alternative D and Alternative E would both reduce, but not to a less-than-significant level, Impact CR-1 (historic architectural resources) compared to the proposed project or project variant. Thus, Alternatives D and E would not reduce as many of the significant impacts of the

[31] Alternative D would include retail parking supply that is not substantially greater than the neighborhood parking rate for retail uses.

proposed project or project variant as the full preservation alternatives, and would not be the environmentally superior alternative.

Alternative F would have comparable significant impacts of the proposed project or project variant and would result in a similar significant and unavoidable historic architectural resources impact. Thus, Alternative F would not be the environmentally superior alternative

Alternative C: Full Preservation – Residential Alternative, unlike the proposed project or project variant, would result in less-than-significant impacts related to the historic resource. Alternative C would continue to have significant impacts related to vehicle miles traveled related to the provision of retail parking substantially greater than the neighborhood parking rate which, like the proposed project or project variant, could be reduced with mitigation. Impacts on transit capacity would remain significant and unavoidable with mitigation. Alternative C would also have similar construction-related noise and vibration impacts as the proposed project or project variant. Thus, on balance this alternative would not be the environmentally superior alternative.

Alternative B, unlike the proposed project or project variant, would result in less-than-significant impacts related to the historic resource (the existing office building and associated site and landscape features). Alternative B would most effectively reduce the impact on the historic architectural resources because it would retain to the greatest degree the character-defining features of the existing building and its corporate campus setting than the other alternatives. Alternative B would reduce the VMT impact to a less than significant level and would not require implementation of Mitigation Measure M-TR-2: Reduce Retail Parking Supply, as would other alternatives for which this mitigation measure is applicable. The significant transit impact on the 43 Masonic bus route could also be reduced with implementation of Mitigation Measure M-TR-4, but, as with the proposed project or project variant, not to a less-than-significant level. Alternative B would also reduce the significant construction noise impact with implementation of Mitigation Measure M-NO-1, but, as with the proposed project or project variant, not to a less-than-significant level. Alternative B would reduce the significant construction vibration impact to a less than significant level but would not require implementation of Mitigation Measure M-NO-2, as would other alternatives for which this mitigation measure is applicable. Moreover, besides the no project alternative, Alternative B would require the least amount of physical alteration to the historic resource at 3333 California Street: it would retain the existing historic structure with limited new construction or exterior alterations (a single-story addition to the existing office building, in-kind replacement of the glass curtain wall for continued office use, and two new buildings) and the majority of the character-defining features of the site and landscape. Additionally, as the alternative with the least amount of physical alteration, Alternative B would result in the fewest physical impacts on the environment. Thus, Alternative B: Full Preservation – Office Alternative would be the environmentally superior alternative.

Alternative B would also further reduce impacts of the proposed project or project variant that were found to be less than significant, or less than significant with mitigation, related to the topics of land use and planning, population and housing, cultural resources (archaeological resources including human remains and tribal cultural resources), greenhouse gas emissions, wind and shadow, recreation, utilities and service systems, public services, biological resources, geology and soils, and hydrology and water quality. Impacts associated with hazards and hazardous materials would be similar to those of the proposed project or project variant.

I. ALTERNATIVES CONSIDERED BUT REJECTED

Several alternative strategies were considered as part of the alternatives scoping process for this EIR (see pp. 6.XX-6.XX). CEQA Guidelines section 15126.6(c) states that an EIR should "identify any alternatives that were considered by the lead agency but rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency's determination." The scoping process for identifying viable EIR alternatives included consideration of the following criteria: ability to meet the basic project objectives; potential to substantially lessen or avoid significant environmental effects associated with the proposed project or project variant; and potential feasibility. As stated in CEQA Guidelines section 15126.6(f)(1), factors that may be considered when a lead agency is assessing the feasibility include:

> site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries (projects with a regionally significant impact should consider the regional context), and whether the proponent can reasonably acquire, control, or otherwise have access to the alternative site (or the site is already owned by the proponent).

Several alternatives were considered but rejected from further analysis because of infeasibility and/or because they would either address issues similar to the full and partial preservation alternatives but would not effectively reduce or lessen any significant impacts and would meet fewer project objectives. The discussion below describes the alternatives considered and the reasons why they were eliminated from consideration in the EIR.

PRESERVATION ALTERNATIVES CONSIDERED AND REJECTED

As stated above, development of the alternatives to the project was informed by comments from the Architectural Review Committee (ARC) of the Historic Preservation Commission (HPC). The planning department's staff report and its attachments including the preservation alternatives report were evaluated by the commissioners at the March 21, 2018 public hearing and ARC comments were summarized by planning department preservation staff. Each of the preservation scenarios presented are briefly described below with reasons for their rejection.

PRELIMINARY FULL PRESERVATION ALTERNATIVE

The preliminary full preservation scenario was similar to Alternative C: Full Preservation - Residential Alternative with respect to changes to the existing building (both demolition and the vertical addition) and new construction with a similar site plan. However, this scenario would continue the office use, similar to Alternative B: Full Preservation - Office Alternative, and consequently would only partially meet the project objective of increasing housing supply. Although this scenario would include a mix of residential, office, retail, daycare, and parking uses similar to the proposed project, it would have fewer residential dwelling units than the proposed project or project variant (344 versus 558 for the proposed project and 744 for the project variant).

The planning department determined that this full preservation scenario was covered within the range of alternatives analyzed in this chapter, specifically by Alternative B and Alternative C. Alternative B responds to the determination that the subject property is eligible for listing on the National Register by continuing the office use and retaining the entirety of the building; and by retaining a greater proportion of the site and landscape features due to limited new construction (only two new buildings, at greater heights and with different footprints and building shapes, would be built). Alternative C also retains a substantial portion of the character-defining features of the property but increases the amount of housing compared to Alternative B in response to the ARC recommendation for adaptive residential reuse of the existing building and additional height for residential buildings on the northern portion of the site. Thus, Alternative B and Alternative C would more appropriately represent the range of environmental impacts that could be expected under this full preservation scenario and more fully achieve project objectives. Therefore, this preliminary full preservation scenario was rejected from further consideration.

PRELIMINARY PARTIAL PRESERVATION ALTERNATIVE (1)

The preliminary partial preservation scenario (1) was similar to Alternative D: Partial Preservation - Office Alternative with respect to changes to the existing building (both limited demolition and the vertical addition), but less so for new construction. This alternative would develop eight three-story townhomes along Masonic Avenue and five four-story townhomes along Euclid Avenue in addition to the three California Street buildings and the Laurel Duplexes along Laurel Street. Furthermore, it would only partially meet the project objective of increasing the housing supply. Although the scenario would include a mix of residential, office, retail, daycare, and parking uses similar to the proposed project, it would have fewer residential dwelling units than the proposed project or project variant (369 versus 558 for the proposed project and 744 for the project variant).

The planning department determined that this partial preservation scenario is covered within the range of alternatives analyzed in this chapter, specifically by Alternative D and Alternative E.

Alternative D, and to a lesser degree Alternative E, responds to the ARC recommendation to include an alternative in which development along Masonic and Euclid avenues on the southern and southeastern portions of the site does not remove as many of the character-defining features of the property and obscure prominent views of the site from Masonic and Euclid avenues looking north and west that convey the relationship between the building and the designed landscape. Alternative E retains less of the character-defining features of the property but increases the amount of housing compared to Alternative D. Thus, Alternative D and Alternative E would more appropriately represent the range of environmental impacts that could be expected under this partial preservation scenario. This preliminary partial preservation scenario was rejected from further consideration because it was determined to have too great an impact on the southern portion of the site and on the assemblage of character-defining building, site, and landscape features that best conveys the relationship between the stepped, multi-story massing of the building, the site topography, and the designed landscape.

PRELIMINARY PARTIAL PRESERVATION ALTERNATIVE (2)

The preliminary partial preservation scenario (2) was similar to Alternative E: Partial Preservation - Residential Alternative with respect to changes to the existing building (both partial demolition and the vertical addition), but less so for new construction. This partial preservation scenario would develop the Euclid Building as under the proposed project and project variant rather than with a smaller footprint as under Alternative E. Furthermore, it would meet the project objective of increasing the housing supply and, as with partial preservation alternative (1) above, it would include fewer residential dwelling units than the proposed project of project variant (493 versus 558 for the proposed project and 744 for the project variant).

The planning department determined that this preservation scenario is covered by Alternatives D and E. Alternative D and, to a lesser degree Alternative E, respond to the ARC comment that development along Masonic and Euclid avenues would remove too many of the character-defining features of the property and obscure prominent views of the site that convey the relationship between the building and the designed landscape. Alternative E would sculpt the Euclid Building to adhere to the footprint of the demolished south wing of the existing building to retain more of the character-defining features on the southern portion of the site. Thus, this preliminary partial preservation scenario was rejected from further consideration.

OTHER PRESERVATION ALTERNATIVES

Further variations on the amount, mix, and intensity of development on the southern portion of the site were explored, such as a variation of preliminary Partial Preservation Alternative (2) with eight, three-story townhomes along Masonic Avenue and either residential or office use of the existing building. For the same reasons as noted above, these variations were rejected from further consideration.

OTHER ALTERNATIVES CONSIDERED AND REJECTED

MAXIMUM OFFICE AND RESIDENTIAL ALTERNATIVE

The maximum office and residential alternative scenario was raised during the alternatives scoping process as an alternative that could meet all project objectives. This scenario was a variation on the proposed project and project variant under which the existing building would be modified to create two separate buildings and would continue as office use.

The planning department determined that this scenario would not address any of the significant environmental impacts. Therefore, this alternative scenario was rejected from further consideration.

OFF-SITE ALTERNATIVE

CEQA Guidelines section 15126.6(f)(2) states that alternative locations should be considered if they would avoid or substantially lessen any of the significant effects. An off-site alternative would consist of a project with design and programming similar to the proposed project or project variant, but in a different, though comparable, infill location within the City and County of San Francisco.

While an alternative location would avoid the impacts associated with demolition of the historic resource, the project sponsor does not have control of, or otherwise have access to, another site large enough for a mixed-use project that could achieve the project objectives. Furthermore, the project sponsor has not indicated any plans to acquire such development rights in the near future were a comparable parcel of land to become available. Additionally, there are not many similarly-sized underutilized infill sites (approximately 10.25 acres) in the city that are designated for residential use, near downtown, and well-served by local transit. As such, an off-site alternative would not feasibly attain many of the project objectives. For these reasons, an off-site alternative was rejected from further consideration.

DESIGN ALTERNATIVES

The project sponsor considered numerous design and site planning concepts for the site. After choosing the initial development concept, the sponsor submitted an Environmental Evaluation Application to the planning department in March 2016 and initiated a neighborhood outreach process to solicit feedback. After receiving input and direction from the planning department, other city agencies, and neighbors, the sponsor revised the concept, which ultimately became the proposed project and its variant, as amended in March 2017, analyzed in this EIR.

As none of these early design and site planning concepts were developed for the purpose of reducing significant environmental impacts, the planning department did not consider these preliminary design concepts as part of CEQA environmental review.

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