Addendum #1 to Environmental Impact Report

Addendum Date:	October 9, 2019
Case No.:	**2008.0586E**
Project Title:	**Academy of Art University Project EIR Addendum**
Zoning/Plan Area:	1069 Pine Street – RM-4/Not in Plan Area
	1055 Pine Street – RM-4/Not in Plan Area
	700 Montgomery Street – C-2/Not in Plan Area
	2295 Taylor Street – NCD/Not in Plan Area
	2340 Stockton Street – C-2/Northeast Waterfront Plan Area
	1946 Van Ness Avenue – RC-4/Van Ness Avenue Corridor Plan Area
	1142 Van Ness Avenue – RC-4/Van Ness Avenue Corridor Plan Area
	2550 Van Ness Avenue – RM-3/RC-3/Not in Plan Area
	2801 Leavenworth Street – C-2/Northeast Waterfront Plan Area
	2225 Jerrold Avenue – PDR-2/Bay View Hunters Point Plan Area
	460 Townsend Street – CMUO/Western SoMa & Central SoMa Plan Areas
	150 Hayes Street – G-3-G/Civic Center & Downtown Plan Area
	121 Wisconsin Street – UMU/Showplace Square/Potrero Hill Plan Area
	168 Bluxome Street – MUG/Western SoMa & Central SoMa Plan Areas
Block/Lot:	Multiple
Lot Size:	Multiple
Project Sponsor:	Academy of Art University
Staff Contact:	Ryan Shum; ryan.shum@sfgov.org; 415-575-9021

1.0 PURPOSE OF THE ADDENDUM

Section 31.19(c)(1) of the San Francisco Administrative Code states that a modification to a previously approved project be reevaluated as follows: "If, on the basis of such reevaluation, the Environmental Review Officer determines, based on the requirements of CEQA, that no additional environmental review is necessary, this determination and the reasons (addendum) therefor shall be noted in writing in the case record, and no further evaluation shall be required by this Chapter." Under CEQA Guidelines section 15164, an addendum to an adopted EIR shall be prepared if only minor technical changes or additions are necessary or none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred. In addition, CEQA section 21166 and CEQA Guidelines sections 15162-15164 provide that when an EIR has been adopted for a project, no subsequent or supplemental EIR shall be required unless one or more of the following events occurs: (1) substantial changes are proposed in the project which will require major revisions of the EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; (2) substantial changes occur with respect to the circumstances under which the project is being undertaken which will require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or (3) new information of substantial importance, which was not known and could not have been known at the time the EIR was

certified complete, becomes available. Under CEQA Guidelines section 15164, the lead agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary, but none of these events has occurred.

Consistent with Section 15164 of the CEQA Guidelines, the purpose of this addendum is to document the Planning Department's determination that no supplemental CEQA review is required for the proposed revised project. This addendum, which is intended to be used in the planning and decision-making process, concludes that the proposed changes to the original project would not result in any new significant environmental impacts or substantial increases in the significance of already identified effects in the Final Environmental Impact Report (Final EIR) certified on July 28, 2016. Thus, no supplemental environmental review for the revised project is required.

2.0 BACKGROUND

The Academy of Art University (AAU), located within the City and County of San Francisco (the city), is a private postsecondary academic institution established in 1929 that currently occupies 40 buildings[1] in the city (predominantly in the northeast quadrant) for its existing educational programs, recreational activities, and student housing. In 2007, AAU occupied 34 buildings; in 28 of those buildings, AAU had implemented various tenant improvements and changes of use without benefit of required building permits or other entitlements. In order to evaluate the potential impacts associated with bringing these 28 buildings into compliance with the San Francisco Planning Code and to analyze AAU's then-proposed plans for growth, an environmental impact report was prepared between 2010 and 2016. During this period, affiliates of AAU acquired an additional six buildings beyond the 34 already occupied, bringing the total number of properties owned or occupied by AAU and its affiliates to 40. The San Francisco Planning Comission certified the Final EIR for the 40 properties included in the AAU project (original project) on July 28, 2016.[2] Table 1 below summarizes the properties analyzed in the Final EIR.

Table 1: Properties Analyzed in the Final EIR

#	Property	#	Property
1.	2340 Stockton Street	21.	1900 Jackson Street
2.	2295 Taylor Street	22.	1916 Octavia Street
3.	2151 Van Ness Avenue	23.	1153 Bush Street
4.	1849 Van Ness Avenue	24.	1080 Bush Street
5.	950 Van Ness Avenune	25.	860 Sutter Street
6.	1069 Pine Street	26.	817-825 Sutter Street
7.	740 Taylor Street	27.	736 Jones Street
8.	625-629 Sutter Street	28.	1055 Pine Street

[1] This figure is approximate in that AAU is in the process of or has already effectively ceased operations in some properties that are to be vacated as described below.

[2] San Francisco Planning Department, *Academy of Art University Project Final Environmental Impact Report*, SCH No. 2010092080, Planning Department Case No. 2008-0586E, certified July 28, 2016. Available online at http://sf-planning.org/environmental-impact-reports-negative-declarations. Accessed March 8, 2018.

Table 1: Properties Analyzed in the Final EIR			
#	**Property**	#	**Property**
9.	491 Post Street	29.	680-688 Sutter Street
10.	540 Powell Street	30.	620 Sutter Street
11.	410 Bush Street	31.	655 Sutter Street
12.	77-79 New Montgomery Street	32.	560 Powell Street
13.	180 New Montgomery	33.	575 Harrison Street
14.	58-60 Federal Street	34.	168 Bluxome Street
15.	601 Brannan Street	35.	2801 Leavenworth Street
16.	460 Townsend Street	36.	700 Montgomery Street
17.	466 Townsend Street	37.	625 Polk Street
18.	1727 Lombard Street	38.	150 Hayes Street
19.	2211 Van Ness Avenue	39.	121 Wisconsin Street
20.	2209 Van Ness Avenue	40.	2225 Jerrold Avenue

The original project analyzed in the Final EIR included four components of future AAU growth based on AAU's proposed expansion and its projected increase in on-site student[3] enrollment to approximately 17,282 students by 2020, which would have included a total increase of approximately 6,100 students (or approximately a five percent increase in students per year), as compared to a reported 2010 on-site student enrollment of 11,181 students. In addition, AAU also anticipated an increase of 1,220 faculty and staff, beyond the reported 2,291 faculty and staff that were employed by AAU in 2010, which would have resulted in a projected total of 3,511 faculty and staff by 2020.

The growth in student and faculty population projected for the original project and analyzed in the Final EIR has not occurred. Instead, as of fall 2018, the total reported on-site student enrollment was 6,710 students, a decline of 4,471 students from the 2010 reported enrollment, and less than one half of the 16,062 on-site students that were projected in the original project for 2017.[4] Despite these declining enrollment numbers, and in order to provide for a conservative analysis of potential environmental impacts, this addendum analyzes a projected three percent (3%) annual growth rate that would result in a total on-site enrollment of 7,119 students in 2020; again, less than one half of the 17,282 students projected for the original project.

As explained below, the original project's four components included program-level growth, project-level growth, legalization of certain prior unauthorized changes, and shuttle expansion:

1. Program-level growth of approximately 110,000 net square feet of additional residential uses (to house approximately 400 students, equivalent to about 220 rooms) and approximately 669,670

[3] For purposes of the Final EIR and this addendum, "on-site student" refers to any student that takes at least one classroom class (as opposed to online) on the AAU campus in a given semester.

[4] Academy of Art University, *2019 Institutional Master Plan*, July 5, 2019. Available online at: https://sfplanning.org/sites/default/files/za/AAU_2019-012970IMP.pdf. Accessed August 13, 2019.

square feet of additional institutional space within 12 study areas that AAU and the Planning Department identified where AAU could occupy buildings;

2. Project-level growth at six specific project sites including 393,537 square feet of institutional uses and 17,533 square feet of recreational uses;[5]

3. Legalization of certain prior unauthorized changes of use and minor physical alterations at 28 of AAU's then existing 34 locations; and

4. Future shuttle system expansion to the 12 study areas in which program-level growth is anticipated.

In the Final EIR, the Planning Department determined that the project would not have significant adverse environmental effects regarding land use; aesthetics; greenhouse gases; wind and shadow; recreation; utilities and service systems; public services; biological resources; geology and soils; hydrology and water quality; mineral and energy resources; and agricultural resources. Certain potentially significant adverse environmental effects regarding cultural and paleontological resources; transportation and circulation; noise; air quality; and hazardous materials were determined to be less than significant with implementation of required mitigation measures. Two project-level impacts were determined to be signficant and unavoidable:

- Impact PH-2.1 determined that the project, including growth in the 12 study areas, would displace substantial numbers of people, or existing housing units, or create demand for additional housing, necessitating the construction of replacement housing elsewhere, or displace a substantial number of businesses or employees.

- Impact PH-2.3 determined that the project, including growth in the 12 study areas and at the six project sites, would displace substantial numbers of people, or existing housing units or create demand for additional housing, necessitating the construction of replacement housing elsewhere, or displace a substantial number of businesses or employees.

In addition, the following cumulative impacts were determined to be significant and unavoidable:

- Impact C-TR-2.1a/2.2a/2.3a identified a significant and unavoidable cumulative impact from a substantial increase in local transit demand that could not be accomodated by adjacent Muni transit capacity at the Kearny/Stockton and Geary corridors under 2035 cumulative plus project conditions.

- Impact C-PH-1 identified a significant and unavoidable impact on population and housing resulting from implementation of the original project, in combination with past, present, and reasonably forseeable future projects in the vicinity.

The changes to the original project, referred to in this addendum as the revised project, are being proposed under a Term Sheet for Global Resolution (Term Sheet) entered into by the city and AAU on November 15,

[5] The six project sites include the following addresses: Project Site 1 (PS-1), 2801 Leavenworth Street (The Cannery); PS-2, 700 Montgomery Street; PS-3, 625 Polk Street; PS-4, 150 Hayes Street; PS-5, 121 Wisconsin Street; and PS-6, 2225 Jerrold Avenue.

2016, as updated by a Supplement to Term Sheet dated July 10, 2019 (collectively, "Term Sheet").[6] As required by the Term Sheet, AAU filed an application for a Development Agreement on December 19, 2016 (Case No. 2008.0586DVA). The Development Agreement identifies certain changes to the original project, as described below. The Term Sheet modifications analyzed in this addendum are considered in the context of a current and projected AAU project size that is substantially reduced from that evaluated in the Final EIR.[7]

3.0 PROPOSED REVISIONS TO THE PROJECT

Under the revised project, AAU would immediately vacate nine of its existing 40 campus properties, thereby reducing existing AAU properties analyzed in the Final EIR to 31. In addition to these 31 existing properties, three properties not currently occupied by AAU would be converted to AAU use for educational programs and student housing. As revised, the AAU campus would therefore be comprised of 34 properties. In addition to the changes described above, the revised project also includes revisions to the proposed uses at two properties previously analyzed in the Final EIR (2801 Leavenworth and 2225 Jerrold). These revisions are summarized in Table 2 and described in more detail below. For 29 of the 31 existing AAU properties analyzed in the Final EIR and included in the proposed AAU campus, there are no material physical changes or changes of use that were not considered in the Final EIR or otherwise required by City code regulations; as a result, these 29 properties will not be evaluated further in this addendum. See section 3.3.2 of this addendum for additional details. The comprehensive list of the 34 AAU properties and their proposed changes and/or modifications as part of the revised project are indentified in Appendix A.

[6] The Term Sheet sets forth generally the terms on which the City and AAU intend to work together to resolve all of the known outstanding issues now pending between them relating to land use matters for properties in San Francisco that AAU uses or controls and establish appropriate principles and processes for AAU land use compliance for the future. The Term Sheet will be implemented through a Development Agreement, Settlement Agreement, Stipulated Injunction and related documents which are subject to final approval by the Planning Commission and Board of Supervisors.

[7] The Development Agreement and Term Sheet referenced in this addendum are included in the Planning Department's Executive Summary of AAU's July 5, 2019 Institutional Master Plan, available at this web link: http://commissions.sfplanning.org/cpcpackets/2019-012970IMP.pdf.

Table 2: Proposed Revisions to the Academy of Arts University Campus			
	Property	**Academy Use Type**	**Size (square feet)**
New[1]	1946 Van Ness Avenue	Institutional	25,040
	1142 Van Ness Avenue	Institutional	50,221
	2550 Van Ness Avenue	Residential	76,402 // 306 beds
Withdrawn[2]	700 Montgomery Street	Institutional	8,159
	1069 Pine Street	Institutional	1,875
	2295 Taylor Street	Institutional	20,000
	2340 Stockton Street	Institutional	44,530
	460 Townsend Street	Institutional	25,920
	150 Hayes Street	Institutional	80,330
	121 Wisconsin Street	Institutional	1,140
	1055 Pine Street	Residential	36,213 // 155 beds
	168 Bluxome Street	Residential	73,822 // 219 beds
Other[3]	2801 Leavenworth Street	AAU's application for 2801 Leavenworth Street (the Cannery) would be modified under the revised project to retain active, publicly accessible ground floor uses. Under the revised project, non-public ground floor space currently used for AAU would be approved for publicly accessible retail uses (including possible use as publicly accessible gallery space related to AAU's programs) pursuant to the Term Sheet. Existing AAU uses in the remainder of the building would continue.	
	2225 Jerrold Avenue	AAU's application for 2225 Jerrold Avenue would be modified to convert a portion of the existing commercial storage uses to a community facility, instead of an AAU recreational space.	

[1] Properties proposed for AAU use that were not analyzed in the FEIR
[2] Properties analyzed in FEIR from which AAU would withdraw uses
[3] Properties analyzed in the FEIR for which AAU has revised their proposed uses

Features of the revised project outlined above are summarized below, followed by a more detailed description of the proposed changes in Section 2.1 of this document.

AAU would vacate a combined total of approximately 172,394 square feet of institutional uses located at 1069 Pine Street, 700 Montgomery Street, 2295 Taylor Street, 2340 Stockton Street, 460 Townsend Street, 150 Hayes Street and 121 Wisconsin Street. AAU also would vacate approximately 374 total beds of existing student housing at 1055 Pine Street (155 beds in 81 group housing bedrooms) and 168 Bluxome (219 beds in 61 live-work units), while converting the existing tourist hotel at 2550 Van Ness Avenue (currently known as the Da Vinci Hotel) to student housing, where 136 rooms would accommodate an estimated 306 beds of student housing. This would result in a net decrease of 6 bedrooms/units and approximately 68 beds, for student housing. AAU has prepared, and the Planning Department has reviewed, detailed plans for each property AAU will continue to occupy in order to determine the maximum numbers of beds that could be supported at AAU's existing student housing properties, without any major interior or exterior

modifications or expansions. Based on this review, the department has determined that a number of AAU student housing properties can support more beds than originally analyzed in the Final EIR (see Appendix A). As a result, it is anticipated that AAU would have a total of approximately 1,839 beds available for students at completion of the revised project. In addition, AAU would activate approximately 75,261 square feet of new institutional uses at 1946 Van Ness Avenue and 1142 Van Ness Avenue.

Under the revised project, AAU would also modify its application for 2801 Leavenworth Street (the Cannery) to require retail or other active uses on the ground floor that are physically accessible to members of the public during the normal retail hours of operation customary in the neighborhood, which uses may include Academy galleries, and limiting AAU institutional uses to the mezzanine, second and third floors of the building.

Under the revised project, AAU would vacate the six-story building at 1055 Pine Street and the one-story building at 1069 Pine Street. The revised project prohibits any future owner of 1055 or 1069 Pine from using the properties for student housing or other accessory uses for AAU's benefit. Future uses at 1055 and 1069 Pine Street are currently unknown; however, any modification to the last-legal uses of 1055 Pine Street or 1069 Pine Street would require authorization from the City through the City's ordinary land use approval process, subject to all applicable San Francisco codes and, if required, appropriate California Environmental Quality Act (CEQA) review at the time such changes (if any) are proposed. As discussed below under section 2.0, the 155 beds currently provided at 1055 Pine Street would be relocated to the Da Vinci Hotel at 2550 Van Ness Avenue (see discussion below). The small gymnasium at 1069 Pine Street would be replaced by an existing, similarly sized gymnasium at 1142 Van Ness Avenue (site of the former Concordia Club).

Under the revised project, AAU would modify its change of use application for 2225 Jerrold to convert a portion of the existing commercial storage uses to a community facility, instead of an AAU recreational space. The Final EIR analyzed the site as containing AAU office space (in the southeast corner of the building), storage areas for AAU bus operations, mechanical/janitorial functions, and other miscellaneous storage for AAU purposes, as well as space used by the San Francisco Fire Department (SFFD) for storage and office space for the Department's Toy Program and an AAU basketball court and weight room to be used for recreational purposes. As part of the revised project, AAU will revise its change of use application to replace the initially proposed AAU recreational facilities with an approximately 15,084 square foot community facility, including a multi-purpose recreation room and indoor and outdoor community facility lounge spaces. AAU would be permitted to use the facility on an accessory basis, subject to regulation under the Development Agreement. The revised project includes modifications to the Jerrold frontage of the property to enhance safe pedestrian and bicycle access to and amenities for the community facility.

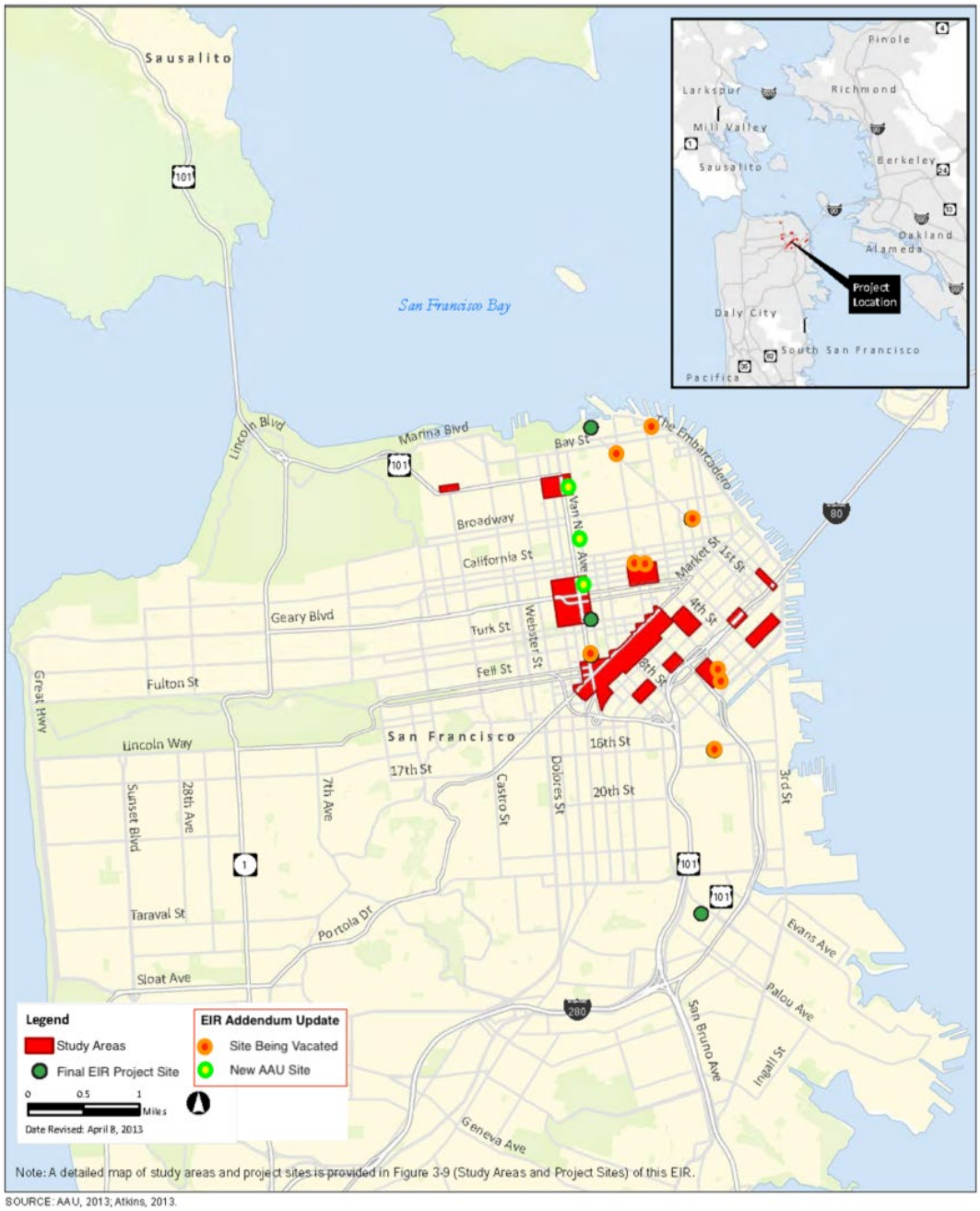
Figure 1 below shows the location of the proposed changes relative to the study areas and project sites analyzed in the Final EIR. Figure 2 shows the location of AAU's existing sites, as analyzed in the Existing Sites Technical Memorandum (ESTM), which was considered by the Planning Commission on July 28, 2016 in connection with its certification of the Final EIR.[8] The purpose of the ESTM was to assess potential pre-Notice of Preparation (NOP)[9] effects that resulted from previously unauthorized changes of use and/or

[8] San Francisco Planning Department, *Academy of Art University Project Existing Sites Technical Memorandum*, May 4, 2016. Available online at: http://sf-planning.org/environmental-impact-reportsnegative-declarations. Accessed March 8, 2018.

[9] The Notice of Preparation for the EIR was published on September 29, 2010. This document (and all other documents cited in this addendum, unless otherwise noted) is available for review at the San Francisco Planning Department, 1650 Mission Street, Suite 400 as part of Case File No. 2010.0586E.

alterations at AAU's 34 then-existing sites and to discuss the required modifications and approvals to legalize those uses and alterations. As previously discussed, the 34 sites and their proposed changes and/or modifications are identified in Appendix A.

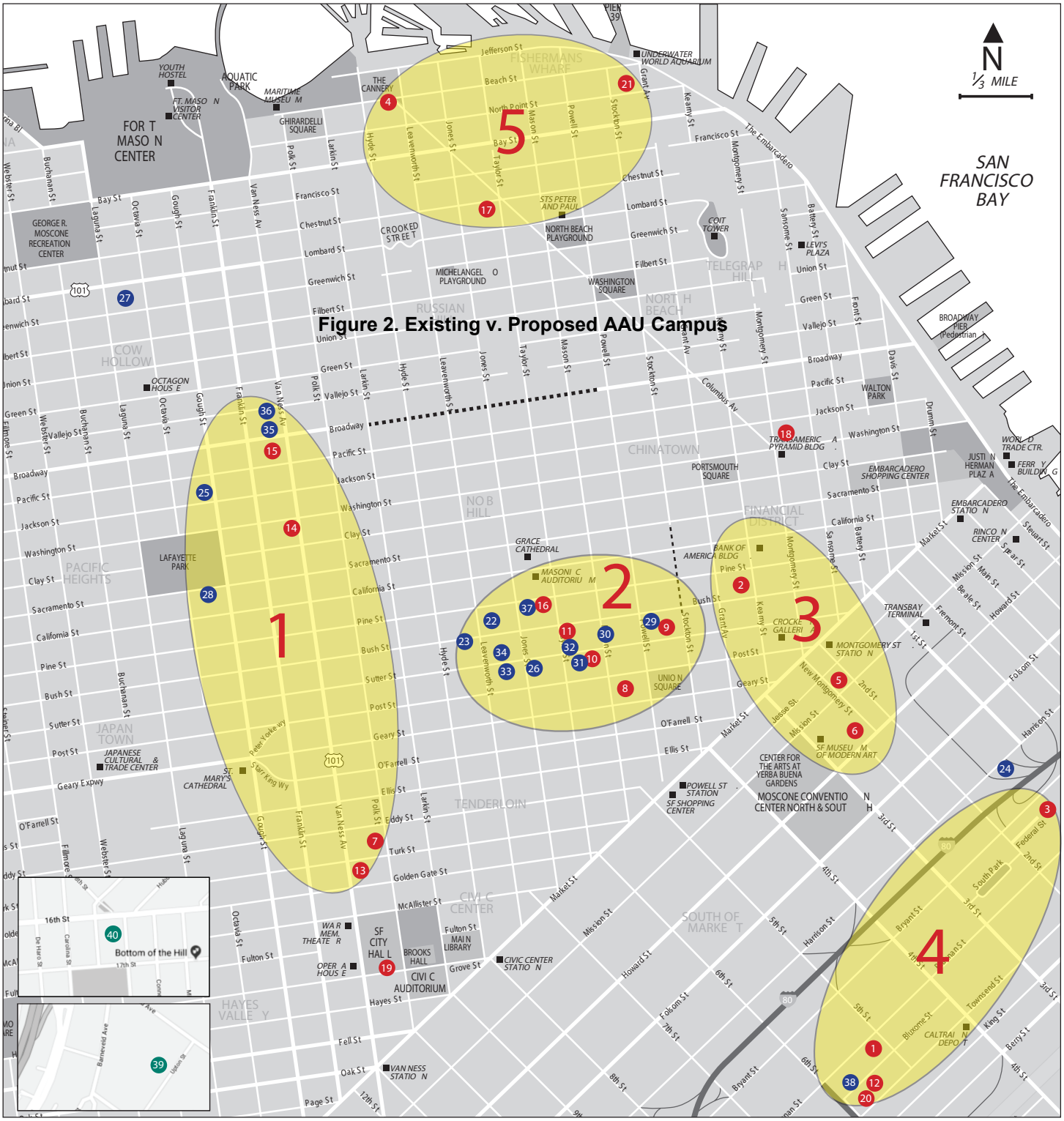
Figure 1. Project Location



SOURCE: AAU, 2013; Atkins, 2013.

Figure 2. Existing v. Proposed AAU Campus

Existing Campus



Legend: Existing Campus

Institutional Sites

1. 601 Brannan St.
2. 410 Bush St.
3. 58-60 Federal St.
4. 2801 Leavenworth St.
5. 77-79 New Montgomery St.
6. 180 New Montgomery St.
7. 625 Polk St.
8. 491 Post St.
9. 540 Powell St.
10. 625-629 Sutter St.
11. 740 Taylor St.
12. 466 Townsend St.
13. 950 Van Ness Ave./963 O'Farrell St.
14. 1849 Van Ness Ave.
15. 2151 Van Ness Ave.
16. 1069 Pine St.
17. 2295 Taylor St.
18. 700 Montgomery St.
19. 150 Hayes St.
20. 460 Townsend St.
21. 2340 Stockton St.

Residential Sites

22. 1080 Bush St.
23. 1153 Bush St.
24. 575 Harrison St.
25. 1900 Jackson St.
26. 736 Jones St.
27. 1727 Lombard St.
28. 1916 Octavia St.
29. 560 Powell St.
30. 620 Sutter St.
31. 655 Sutter St.
32. 680-688 Sutter St.
33. 817-831 Sutter St.
34. 860 Sutter St.
35. 2209 Van Ness Ave.
36. 2211 Van Ness Ave.
37. 1055 Pine St.
38. 168 Bluxome St.

Other

39. 2225 Jerrold Ave. Commercial Storage & Private Parking Garage (and lot) with Accessory Office
40. 121 Wisconsin St. (Vehicle Storage)

Clusters

1. Van Ness Transit Corridor
2. Union Square
3. Financial District
4. South of Market
5. Fisherman's Wharf

Source: AAU

Proposed Campus

Legend: Proposed Campus

Institutional Sites

1. 601 Brannan St.
2. 410 Bush St.
3. 58-60 Federal St.
4. 2801 Leavenworth St.
5. 77-79 New Montgomery St.
6. 180 New Montgomery St.
7. 625 Polk St.
8. 491 Post St.
9. 540 Powell St.
10. 625-629 Sutter St.
11. 740 Taylor St.
12. 466 Townsend St.
13. 1849 Van Ness Ave.
14. 2151 Van Ness Ave.
15. 1946 Van Ness Ave.
16. 1142 Van Ness Ave.

Residential Sites

17. 1080 Bush St.
18. 1153 Bush St.
19. 575 Harrison St.
20. 1900 Jackson St.
21. 736 Jones St.
22. 1727 Lombard St.
23. 1916 Octavia St.
24. 560 Powell St.
25. 620 Sutter St.
26. 655 Sutter St.
27. 680-688 Sutter St.
28. 817-831 Sutter St.
29. 860 Sutter St.
30. 2209 Van Ness Ave.
31. 2211 Van Ness Ave.
32. 2550 Van Ness Ave.

Other

33. 2225 Jerrold Ave.
(Commercial Storage & Private Parking Garage (and lot) with Accessory Office; Community Facility)

34. 950 Van Ness Ave./963 O'Farrell St.
Private Parking Garage with groundfloor classic car museum ancillary to museum located at 1849 Van Ness Ave.

Clusters

1. Van Ness Transit Corridor
2. Union Square
3. Financial District
4. South of Market

Source: AAU

3.1 Changes to AAU Properties

The discussion below presents detailed descriptions of the changes proposed at each location included as part of the revised project. As contemplated by the Term Sheet, the entitlement for the approved uses would be authorized contemporaneously with and through the city's final approval of a Master Conditional Use Permit issued pursuant to the Development Agreement. The Master Conditional Use Permit Application will include updated plan sets for each property. The plan sets do not contemplate any substantial new development, but do address applicable Planning Code improvement requirements, as well as Planning Code-compliant signage proposals.

1055 and 1069 Pine Street – Withdraw Pending Change-of-Use Applications

AAU currently uses 1055 Pine Street for student housing (155 beds) and 1069 Pine Street for recreation (approximately 1,875 square feet of exercise equipment). Both sites are located between Jones and Taylor Streets on Pine Street, within the RM-4 (Residential-Mixed, High Density) zoning district and a 65-A height and bulk district. Under the revised project, AAU would vacate these two sites.

Under the revised project, AAU would vacate its uses at the six-story building at 1055 Pine Street and the one-story building at 1069 Pine Street and make those sites available to a third-party unrelated to AAU. The revised project includes an agreement that prohibits any future owner of 1055 Pine Street or 1069 Pine Street from using the properties for student housing or other accessory uses for AAU's benefit. Future uses at 1055 Pine Street and 1069 Pine Street are currently unknown; however, any future modification to the last-legal use of 1055 Pine Street or 1069 Pine Street would require authorization from the City through the City's ordinary land use approval process, subject to all applicable San Francisco codes and, if required, appropriate California Environmental Quality Act (CEQA) review at the time such changes (if any) are proposed. The 155 beds currently provided at 1055 Pine Street would be relocated to the Da Vinci Hotel at 2550 Van Ness Avenue (see discussion below). The 1069 Pine Street building contains a small gymnasium which would be replaced by a similarly sized gymnasium at 1142 Van Ness Avenue (the former Concordia Club).

700 Montgomery Street, 2295 Taylor Street, 2340 Stockton Street; 168 Bluxome Street; 150 Hayes Street; 460 Townsend Street; and 121 Wisconsin Street – Withdraw Existing Uses and/or Pending Change of Use and Conditional Use Applications

Under the revised project, the following properties would be vacated by AAU, and all outstanding change of use, Conditional Use (CU), or Certificate of Appropriateness applications associated with these sites would be withdrawn:

- 700 Montgomery Street: conditional use authorization; Certificate of Appropriateness. Analyzed as Project Site 2 in the Final EIR, this approximately 11,455 square foot building provided administrative, restaurant and classroom uses.
- 2295 Taylor Street: conditional use. Analyzed as Existing Site 2 in the ESTM, this approximately 10,440 square foot building was used for graduate studio and office space.
- 2340 Stockton Street: change of use. Analyzed as Existing Site 1 in the ESTM, this approximately 44,530 square foot building provided 16 classrooms, labs, art studios, offices, and student and faculty lounges.

- 168 Bluxome Street: no pending applications. Analyzed as Existing Site 32 in the ESTM, this approximately 73,820 square foot building provided 61 live/work units with capacity for 219 beds.
- 150 Hayes Street: change of use. Analyzed as Project Site 4 in the Final EIR, this approximately 80,330 square foot building was used for one of the Academy's regional headquarter offices.
- 460 Townsend Street: conditional use. Analyzed as Existing Site 33 in the ESTM, this approximately 25,920 square foot building provided six classrooms, art studios, and student and faculty lounges.
- 121 Wisconsin Street: no pending application. Analyzed as Project Site 5 in the Final EIR, this approximately 20,000 square foot lot was used for storage of Academy shuttle buses.

1946 Van Ness Avenue (the Bakery) – Change of Use

1946 Van Ness Avenue is an approximately 25,040-square-foot building that was acquired in December 2012 by 1946 Van Ness Avenue, LLC, an entity affiliated with AAU. It is located at the corner of Jackson Street and Van Ness Avenue. The property is located in an RC-4 (Residential-Commercial, High Density) zoning district. Previously issued building permits established the building use as ground floor retail and above ground retail and/or light manufacturing; however, the building had been vacant for some years prior to 1946 Van Ness Avenue, LLC's acquisition of the building. While this site was neither analyzed as a project nor located in any of the 12 study areas analyzed in the Final EIR, it is located between and within blocks of study areas two and three (SA-2 and SA-3), and is situated in a similar setting as other properties within these study areas that are located along the Van Ness corridor.

As part of the revised project, AAU proposes to convert the property to a post-secondary educational institutional use. The conversion for post-secondary educational institutional use would require modifications to the base building core and shell to bring the building into compliance with current life safety codes (e.g., fire sprinkler/fire alarm upgrades). The proposed scope of work includes installation of new aluminum storefronts with tempered glass in the existing openings for both the Van Ness Avenue and Jackson Street facades. On the upper floors, broken or missing windows would be repaired or replaced, as appropriate, to match existing glazing. Further repair includes the in-kind replacement of doors on Jackson Street, restoration of prior window replacements with windows to match in material and design, and removal of mechanical features, such as ventilation flues, and general maintenance of the property. Improvements to the 1946 Van Ness Avenue property would be consistent with *Secretary of the Interior's Standards for Rehabilitation* (Secretary's Standards).

Interior alterations would be related to the conversion of the building for post-secondary educational institutional use, and include the construction of partition walls, introduction of new sanitary facilities, construction of interior stairs, and other tenant improvements to support its institutional use. More specifically, the space would be divided to accommodate a number of vocational rooms, or classrooms to serve AAU's Industrial Design and Auto Restoration Programs, including a ground floor auto instructional work space and display. The conversion for post-secondary educational institutional use would be limited to open flexible space for AAU's use.

As proposed, the ground floor, mezzanine level, and second and third floors would comprise a number of vocational rooms, or classrooms, for the Academy's Auto Restoration and Industrial Design Programs. In order to activate the ground floor, and in association with the Auto Restoration Program, the ground floor will likely contain an automobile display and instructional work space, and an instructional auto body

paint shop. The mezzanine level would comprise of one large classroom and one small lab, also in association with the Auto Restoration Program. The second and third levels would house the Industrial Design program. Each floor would include one single open space. These floors would include movable floating partitions, but no permanent walls.

There would be four different start times for classes commencing between 8 a.m. and 10 p.m. daily. Classes would range in duration from three to five hours. Daily student population would range from 75 to 100 students at peak period with approximately six to ten staff on site. Class start times and duration would range, with classes lasting from three to five hours.

Any future interior improvements for specific programs would require separate permits. Sign proposals, floor plans, and property improvements and renovations necessary for or associated with the change of use would be approved under the Master CU application. The property would be served by existing AAU shuttle lines on Van Ness Avenue as well as the shuttle stop at 625 Polk. The proposal includes Class I and Class II bike parking.

1142 Van Ness Avenue (the Concordia Club) – Change of Use

1142 Van Ness Avenue is an approximately 50,221-square-foot building that was acquired in December 2014 by 1142 Van Ness LLC, an affiliate of AAU. It is located at the corner of Post Street, Cedar Street, and Van Ness Avenue. Previously issued building permits have established the building use as a private community facility. The property is located within an RC-4 (Residential-Commercial, High Density) zoning district. Under the revised project, AAU proposes to use 1142 Van Ness Avenue for post-secondary educational institutional use. Sign proposals would be submitted with the Master CU application. The property would be served by existing AAU shuttle lines on Van Ness Avenue as well as the shuttle stop at 625 Polk.

Physical changes to the property would be limited to minor exterior improvements, including: an in-kind replacement of an egress door and security gate on Post Street, and security camera replacement at the corner of Van Ness Avenue and Cedar Street consistent with the Secretary's Standards. The current configuration of the building would remain as-is to support the Academy's Fashion program; larger spaces would be used for fashion studios, labs, and occasional event hosting space, while smaller rooms would be used for classrooms and/or offices. The basement includes recreational space (including a swimming pool) that would be available to AAU students, faculty and staff. Daily student population is estimated to range from 115-300 students, with approximately 10 staff on site. The daily (Monday through Friday) schedule is expected to include four different class periods: one in the morning, two in the afternoon, and one in the evening. There would also be a limited number of classes on Saturday.

Any future interior improvements for specific programs would require separate permits. Sign proposals, floor plans, and property improvements necessary for the change of use would be approved under the Master CU application. It is anticipated that students using AAU's shuttle system will utilize the stop at 625 Polk, three and a half blocks from 1142 Van Ness. The proposal includes Class I and Class II bike parking.

2550 Van Ness Avenue (the Da Vinci Hotel) – Change of Use

2550 Van Ness Avenue, also known as the Da Vinci Hotel, is an approximately 76,402-square-foot building located at the corner of Filbert Street and Van Ness Avenue. The building was acquired in September 2010 by 2550 VN Pool, LLC, an affiliate of AAU, and has been leased to a third-party hotel operator.

Previously issued building permits have established the building use as a tourist hotel/motel, with a ground floor restaurant use. The property straddles two zoning districts: RM-3 (Residential-Mixed, Medium Density), and RC-3 (Residential-Commercial, Medium Density). The Da Vinci Hotel at 2550 Van Ness Avenue currently has a total of 136 rooms. Under the revised project, AAU proposes to use all 136 of these rooms (approximately 306 beds) as student housing, including replacement housing for students vacated from the 155 beds at 1055 Pine Street. The existing ground floor restaurant use, which was recently vacated by the existing tenant, would be converted to a code-compliant restaurant/retail space that may be operated by the Academy, but would remain open and accessible to members of the public pursuant to requirements set forth in the Development Agreement. The proposed change from rooms used by tourists to group housing for students would require approval of a change of use through the Master CU. Students would be housed at 2550 Van Ness Avenue according to a metering formula (discussed below under Additional Term Sheet Requirements) which requires a minimum amount of student housing to be provided according to the number of enrolled full-time students. The conversion to housing is also dependent upon the schedule for the relocation of students from 1055 Pine Street. The only proposed interior changes at the property would be replacing hotel furnishings with student dormitory furnishings. Sign proposals, floor plans, and property improvements necessary for the change of use would be submitted with the Master CU application. AAU would make use of existing shuttle lines on Van Ness Avenue to serve the property; the closest shuttle stop is located at 1604 Broadway, about four blocks to the south. AAU proposes class I and class II bike parking, including converting existing off-street parking spaces into class I bike parking.

2801 Leavenworth Street (the Cannery) – Modify Change of Use Application

2801 Leavenworth Street (identified as Project Site 1 in the Final EIR), is located in San Francisco's Fisherman's Wharf at the corner of Beach Street and Leavenworth Street and includes two wings totaling approximately 124,981 square feet. 2801 Leavenworth Street is owned by 2801 Leavenworth-Cannery, LLC in 2011, an affiliate of AAU. AAU uses a portion of the building (approximately 80,900 square feet) for office, gallery, and multi-use/event space. The original project analyzed AAU's proposed use of 133,675 square feet of this site as post-secondary educational institutional use to accommodate approximately 1,600 students and 18 faculty/staff per day. There are two classroom spaces on the first floor of this building, only one of which is currently in use. As part of the revised project, AAU would modify the application for 2801 Leavenworth Street to retain retail or other active uses on the ground floor that are physically accessible to members of the public during normal retail hours of operation (as are customary in the neighborhood). Retail uses, as described below, may include AAU galleries, while other AAU uses would be limited to the mezzanine, second and third floors of the building. Sign proposals, floor plans, and property improvements necessary for the change of use would be submitted with the Master CU application.

2801 Leavenworth is comprised of two buildings separated by a wide public walkway. The first level includes approximately 39,150 square feet, of which approximately 22,669 square feet is being utilized for restaurants and approximately 6,880 square feet is being used for retail purposes. Under the revised project,

the remaining 9,300 square feet of vacant space would be used for AAU's Fine Arts program, which includes sculpture, print, painting, ceramics, and jewelry, along with visual merchandising.

The multi-functional space would include active, street-level retail space, as well as a smaller interior space for workshops and lectures (institutional use). The total occupancy for the 9,300 square feet would be no more than 172 students and faculty/staff.

Retail uses would be available to the public and could include art galleries, visual merchandise, and sale of fine arts items created by students and alumni of AAU. The dynamic multi-functional space is intended to widen the reach of AAU artists and designers to the general public by providing them a platform to showcase their work. Retail space may have rotating art installations and provide a specialized browsing experience for visitors. As this is primarily a retail use, students/staff would not use the retail space on a regular basis. However, occasional workshops/lectures may be held once to twice per month, with attendance not to exceed 18 students. Bi-monthly events are likely to be held during the weekdays. The proposed retail use would be open to the public Monday-Saturday 9 a.m. to 6 p.m.

2225 Jerrold Avenue

2225 Jerrold Avenue (identified as Project Site 6 in the Final EIR), is a lot totaling 125,581 square feet, containing a 91,367 square foot building, located in the southeasterly portion of a trapezoidal block bounded by Jerrold Avenue to the north, Upton Street to the east, McKinnon Avenue to the south, and Barneveld Avenue to the west in the Bayview Hunters Point neighborhood. The Final EIR analyzed the site as containing AAU office space (in the southeast corner of the building), storage areas for AAU bus operations, mechanical/janitorial functions, and other miscellaneous storage for AAU purposes, along with approximately 22,683 square feet used by the San Francisco Fire Department (SFFD) for storage and accessory office space for the Department's Toy Program. The Final EIR analyzed the inclusion of an approximately 17,533 square foot AAU basketball court and weight room for recreational purposes. As part of the revised project, AAU will revise its change of use application to replace the initially proposed AAU recreational facilities with an approximately 15,084 square foot community facility, including a multi-purpose recreation room and indoor and outdoor community facility lounge spaces. Construction of the revised project would not require any substantial ground and soil disturbance activities. AAU would be permitted to use the facility on an accessory use basis, subject to regulation under the Development Agreement. The revised project includes modifications to the Jerrold frontage of the property to enhance safe pedestrian and bicycle access to amenities and community facility uses in the building. Proposed plans, including floor plans, signage plans and streetscape plans would be submitted with the Master CU application.

3.2 Shuttle Service

The revised project would modify some elements of the existing shuttle service provided by AAU. Existing shuttle service stops would be removed at 150 Hayes, 2340 Stockton, 168 Bluxome, 1069 Pine and 1055 Pine due to AAU vacating these properties. However, AAU would add new shuttle stops to the "M" route at 1604 Broadway and 1916 Octavia. In addition (and as described below in greater detail under section 2.3.3 below), AAU has prepared a Shuttle Management Plan (included as Attachment H to the Term Sheet) in compliance with the EIR Mitigation Measure M-TR-3.1 Shuttle Demand, Service Monitoring, and Capacity Utilization Performance Standard and EIR Improvement Measure I-TR-2 AAU Shuttle Activities

Monitoring (included as a condition of approval to the project). The Shuttle Management Plan is described in more detail below.

3.3 Additional Term Sheet Requirements

3.3.1 Student Housing

As described in the Term Sheet, the Supplement to the Term Sheet and the Development Agreement application, AAU will (either through limiting enrollment or developing new code-compliant student housing, including any required study under CEQA) make the following commitments regarding the provision of student housing in the future, subject to the process described in the Development Agreement for deferring these increases if occupancy rates do not support them:

- By July 1, 2022, AAU will house in San Francisco at least 36 percent of its full-time students taking up to one class online; and
- By July 1, 2023, AAU will house in San Francisco at least 38 percent of it full time students taking no more than one class online.

After July 1, 2023, the Academy will use good faith efforts to house in San Francisco at least 45 percent of its full-time students taking no more than one class online. Those commitments will be documented in a binding Development Agreement.

3.3.2 Approval of Existing Uses and Minor Physical Changes

The Term Sheet requires approval of existing uses and minor physical changes (for example, required Planning Code improvements for a change of use and new signage proposals) at the 31 sites previously discussed above. As previously discussed, the uses and material physical changes of the 31 properties described in Appendix A were analyzed in the Final EIR (except 2550 Van Ness, 1946 Van Ness and 1142 Van Ness).

As indicated in Appendix A, seven properties require legislative amendments and associated conditional use authorizations and building permits, ten properties require conditional use authorizations and associated building permits, and ten properties require change of use permits. These approvals (and other variances/exceptions from technical requirements provided for under the Planning Code) will be addressed in a single Master CU. The Master CU will also be required as a prerequisite to building permit approval for properties not otherwise requiring Conditional Use authorization so as to better memorialize the legality of AAU's use at the time of the approval of the Development Agreement, and to provide a cohesive and comprehensive review and approval process. As discussed above, these 31 properties have already been described in the ESTM (or in the Final EIR in the case of 2801 Leavenworth Street, 625 Polk Street, and 2225 Jerrold Avenue) and found to have no impact on the environment in the Final EIR. Ten of the 34 sites are designated in Article 11 of the Planning Code and four[10] of the 34 sites are designated in Article 10 of the Planning Code and, as such, were determined by the ESTM (or Final EIR in the case of 625 Polk Street) to require Historic Preservation Commission approval of Permits to Alter or Certificates of

[10] 491 Post is designated in both Articles 10 and 11 of the Planning Code.

Appropriateness for work performed without benefit of a permit.[11] (The required alterations and approvals are discussed below under Cultural Resources.) Alterations at these properties included typical tenant improvements such as interior construction (drywall, paint, and lighting), security system installation, fire sprinkler/fire alarm upgrades, elevator modernization, and exterior signage. For some buildings, tenant improvements might include seismic retrofit work, replacement of windows and lighting, and addition of awnings and exterior lighting. As stated in the ESTM: "These improvements would cause minimal impact to the architectural features of the properties and would be unlikely to cause the removal of character defining features of a historical resource, such that the historic significance of the property could no longer be conveyed."[12] Likewise, the Final EIR concluded with regard to 625 Polk that none of the proposed alterations would constitute a substantial change to the significance of the resource. Since the Final EIR, AAU and the Planning Department have engaged in further permit history research to determine the exact required scope of alterations required to bring historic AAU buildings into compliance with pertinent code regulations and historic standards.

The requirement for approval of existing uses at the 34 sites (other than 1946 Van Ness, 1142 Van Ness and 2550 Van Ness described below) was evaluated in the ESTM and/or Final EIR, and the legalization of the prior unauthorized uses was found to have no impact on the environment in the Final EIR. As no other material physical changes or changes of use not considered in the Final EIR or otherwise required by City code regulations to legalize AAU's uses are proposed by AAU for these 34 properties, they will not be evaluated further in this addendum.

In addition, the Term Sheet includes the following requirements related to future AAU expansion and operation:

- Preparation of an Institutional Master Plan prior to approval of the Development Agreement between the city and AAU, and timely maintenance of an Institutional Master Plan as required by Planning Code section 304.5. At a July 25, 2019 hearing, the Planning Commission accepted an Institutional Master Plan submitted by AAU to the Planning Department on July 5, 2019.[13]

- Compliance with all applicable laws concerning future construction, alterations and changes in use to all properties that AAU may own.

- No conversion for any purpose of any structures currently used or occupied as housing or for which the last legal use was residential.

[11] A Permit to Alter is the entitlement required to alter a Significant or Contributory building or any building within an article 11 conservation district. Depending upon the scope of the alteration, a major or minor permit to alter may be required. The former requires a hearing before the Historic Preservation Committee; the latter is approved by Planning Department Preservation staff and do not require a hearing before the Historic Preservation Commission. The specific alterations and approvals are discussed in the Cultural Resources section of this addendum.

[12] San Francisco Planning Department, *Academy of Art University Project Existing Sites Technical Memorandum*, p. 4.5-62-63, May 4, 2016. Available online at: http://sf-planning.org/environmental-impact-reportsnegative-declarations. Accessed March 8, 2018.

[13] San Francisco Planning Department, *2019 Institutional Master Plan*. Available at: https://sfplanning.org/sites/default/files/za/AAU_2019-012970IMP.pdf. Accessed August 13, 2019.

- No submission of an application by the Academy or any of its affiliates for change of use, new construction, or demolition of any building owned, occupied, or operated by the Academy without prior notice to and consultation with the department.
- With limited exception, in no event may more than one half of future Student Housing be provided in converted tourist hotels.

These additional Term Sheet requirements, do not involve potential impacts to the environment and are not further analyzed in this addendum.

3.3.3 Shuttle Management Plan

The Term Sheet includes a requirement for AAU to develop and implement a shuttle management plan as required by EIR Mitigation Measure M-TR-3.1 Shuttle Demand, Service Monitoring, and Capacity Utilization Performance Standard and EIR Improvement Measure I-TR-2 AAU Shuttle Activities Monitoring (included as a condition of approval to the project). The shuttle management plan is primarily intended to address AAU meeting the peak hour transportation needs of AAU students and staff through its shuttle service such that unmet shuttle demand does not impact the city's transit and transportation system. Annual capacity utilization analysis is required to determine if demands for shuttle services are being adequately met such that shifts to other travel modes that could impact the city's transit and transportation system is avoided.

In compliance with EIR Mitigation Measure M-TR-3.1 and the Term Sheet, AAU will submit an annual report to the Planning Department documenting actually travelled shuttle routes, ridership numbers and received complaints. The report will be submitted on an annual basis covering the recurring year-long period to be determined in consultation with the Planning Department and the SFMTA. The report format will be approved by Planning Department and SFMTA staff, and will comply with the requirements set forth in Mitigation Measure M-TR-3.1 and the Term Sheet. As described in Mitigation Measure M-TR-3.1, the data from the reports will help inform potential adjustments to the shuttle program to address shuttle demand, avoid regular exceedances of the capacity utilization standard, and ensure that shuttle activities do not substantially impede or interfere with traffic, adjacent land use, transit, pedestrians, commercial or passenger loading, and bicycles in the public right-of-way.

3.4 Student Enrollment

The original project analyzed a projected total on-site enrollment of approximately 17,282 on-site students (full- and part-time students taking at least one course in San Francisco) by 2020, which represented an average increase of approximately 5 percent per year starting from a 2010 baseline of 11,182. This projected enrollment represented an increase of 6,100 students between 2010 and 2020. Actual enrollment is significantly lower than would have occurred under the Final EIR's assumed rate of growth. Based on the rate of growth assumed under the original project, on-site enrollment would have been 16,062 students in 2018. However, actual enrollment of on-site students declined from 11,181 to 6,710 students between 2011 and 2018. Thus, actual enrollment is currently less than 50 percent of projected enrollment under the Final EIR. Table 3 provides additional information on projected versus actual enrollment.

AAU currently operates approximately 1,810 beds of student housing. The original project studied program-level growth that would result in an additional 400 beds of student housing, for a total future capacity of 2,210 beds. Under the revised project, the relocation of student housing from 1055 Pine (155

beds) to 2550 Van Ness (306 beds) would result in an increase of approximately 151 beds; however, AAU would also withdraw from 168 Bluxome Street, which currently provides 219 beds. Building permits for each residential property would allow the maximum number of beds permissible at the existing AAU residential properties (without any significant wall modifications or floor area expansions) allowable under pertinent code regulations. Factoring in these modifications since the Final EIR, the revised project would result in a net increase of 29 beds for a total capacity of 1,839 beds. This is within the total future capacity studied in the Final EIR.

Table 3 Actual and Projected Enrollment

	2010	*2011*	*2012*	*2013*	*2014*	*2015*	*2016*	*2017*	*2018*	*2019*	*2020*
On Site Students											
Actual Enrollment[1]	11,181	11,636	11,493	10,766	10,261	9,449	8,406	7,588	6,710	-	-
Change in Actual Enrollment from Prior Year	-	4.1%	-1.2%	-6.3%	-4.7%	-7.9%	-11%	-9.7%	-11.6%	-	-
Projected Enrollment in original project[2]	-	11,792	12,402	13,012	13,622	14,232	14,842	15,452	16,062	16,672	17,282
Difference of Actual/Projected Enrollment	-	(156)	(909)	(2,246)	(3,361)	(4,783)	(6,436)	(7,864)	(9,352)	-	-

[1] Source: Office of Institutional Research, Academy of Art University (data as of Census); confirmed as of 3/22/2018.
[2] Calculations: 2010 baseline with 2020 Final EIR projected approximate increase of 610 students/year (represents roughly 5.5% annual growth).

AAU has the policy of first offering housing to first-year, full-time graduate students (enrolled in at least 9 units) and full-time undergraduate students (enrolled in at least 12 units) taking all of their courses on-site in San Francisco. To the extent beds remain available, other full-time graduate and undergraduate students taking all of their courses on-site in San Francisco and full-time graduate and undergraduate students taking no more than one class online per semester may apply to fill any remaining beds. Only to the extent beds remain available after the student populations above have had the opportunity to apply for housing will the Academy consider applications for housing from full-time students that take two or more online classes or part-time students. The Academy gives lower priority to full-time students electing to take two or more online courses per semester, as it is the policy of the Academy. AAU currently uses 17 buildings for housing. From fall 2015 to fall 2018, on-campus student enrollment declined from prior years and demand for campus housing correspondingly decreased. Under the revised project, AAU would operate 16 buildings for housing, intended to provide a sufficient amount of housing for the revised growth assumptions (as regulated by the Development Agreement housing amount regulations described in Section 2.3.1).

3.5 Project Approvals

Before discretionary project approvals may be granted for the revised project by the city or a Responsible Agency, the San Francisco Planning Commission, as the approval body of the lead agency, will review and consider the information presented in the EIR Addendum. In addition to the approvals for changes of use and physical alterations reflected in the ESTM and EIR (see Appendix A), at the end of this section is a list

of discretionary, nondiscretionary approvals, and other related actions which would or may be required to implement the revised project, if approved, although other approvals may also be necessary.

As noted above, a single "Master" Conditional Use Authorization will be required in connection with all required discretionary approvals, regardless of whether a Conditional Use Authorization would otherwise be required, and in-lieu of any other waivers, modifications, or Variances required. Through this process, AAU's public review and approval process will be conducted in the most comprehensive and consolidated fashion possible. A similar approach will be required for a single "Master" Certificate of Appropriateness and "Master" Permit to Alter, which will each address all properties subject to the review processes of Articles 10 and 11, respectively.

- **1055 and 1069 Pine Street** – Withdraw pending conditional use and building permit applications;
- **2801 Leavenworth Street** – Modify the change of use application (application number 201211134023) for 2801 Leavenworth Street to retain retail or other active uses on the ground floor that are physically accessible to members of the public during normal retail hours of operation (as are customary in the neighborhood).
- **2550 Van Ness Avenue (the Da Vinci Hotel)** – Change of use from tourist hotel/motel to student housing (136 rooms with 306 beds) for a postsecondary educational institution within a RM- 3 (residential – mixed, medium density), and RC-3 (residential – commercial, medium density) district requiring conditional use authorization (San Francisco Planning Code section 303), and under Section 209.2 and 209.3 and San Francisco Planning Code section 171, which requires a building permit to change the planning code use category of a property. Therefore, a building permit (i.e., a "change of use" permit from tourist hotel/motel to institutional use) would also be required.
- **1946 Van Ness Avenue (the Bakery)** – Change of use from automobile sales/showroom and office for a postsecondary educational institution (classroom, labs and ground-floor auto museum) within a RC-4 (Residential-Commercial High Density) district. The proposed change requires conditional use authorization (San Francisco Planning Code section 303), and under Section 209.3 and San Francisco Planning Code section 171, a building permit to change the planning code use category of a property. Therefore, a building permit (i.e., a "change of use" permit from automobile sales/showroom and office to institutional use) would also be required.
- **1142 Van Ness Avenue (the Concordia Club)** – Change in use from office/club for a postsecondary educational institution (classroom, office, fashion studios and labs, and events space) within a RC-4 (Residential-Commercial High Density) district. The proposed change requires conditional use authorization (San Francisco Planning Code section 303), and under Section 209.3 and San Francisco Planning Code section 171, a building permit to change the planning code use category of a property. Therefore, a building permit (i.e., a "change of use" permit from office/club to institutional use) would also be required.

4.0 ANALYSIS OF POTENTIAL ENVIRONMENTAL EFFECTS

The Final EIR analyzed the environmental effects of implementing a significantly larger original AAU project. As discussed above, the current on-site student enrollment is less than half of what was projected for 2017 in the Final EIR analysis. The currently projected growth in on-site enrollment for 2020 is similarly expected to be about half of what was considered in the Final EIR. In addition, AAU would vacate the nine buildings at 1055 Pine Street, 1069 Pine Street, 700 Montgomery Street, 2295 Taylor Street, 2340 Stockton Street, 168 Bluxome Street, 150 Hayes Street, 460 Townsend Street, and 121 Wisconsin Street. The projected growth within the 12 study areas that was analyzed in the Final EIR (110,000 net square feet of additional residential uses and approximately 669,670 square feet of additional institutional space) has not yet occurred and is not proposed to occur under the revised project..

The revised project has been further refined and modified from the original project to centralize and consolidate its educational programs and student housing to existing buildings on the Van Ness corridor, where a significant portion of AAU's campus is already concentrated; however, as shown in the analysis below, the revised project would not result in new environmental impacts, substantially increase the severity of the previously identified environmental impacts, or require new mitigation measures, and no new information has emerged that would materially change the analyses or conclusions set forth in the original project. Therefore, as discussed in more detail below, the revised project would not change the analysis or conclusions reached in the EIR for the original project, nor would substantially greater impacts occur.

4.1 Land Use and Planning

The Final EIR determined that the original project would not physically divide an established community, resulting in no impact, or have a substantial impact upon the existing character of the vicinity, resulting in a less-than-significant impact within the study areas and at the project sites. Similarly, the Final EIR also determined that the original project, in combination with past, present, and reasonably foreseeable future projects in the vicinity, would not contribute considerably to a cumulative impact on land use. No mitigation measures were required by the Final EIR with respect to land use and planning.

As with the original project, the revised project would not physically divide an established community because AAU would accommodate its growth through the occupation and change of use of existing buildings for educational, student residential, or recreational purposes. Institutional uses would be consistent with the existing pattern of development or range of existing uses in the study areas, all of which exist in a dense urban context. In general, AAU residential and institutional uses would be consistent with the existing character and scale of development and range of existing uses in and around the vicinity of the study areas and project sites. There would be no new significant environmental effects or a substantial increase in the severity of previously identified impacts related to physically dividing an established community or the existing character of the vicinity. Therefore, the revised project would not change the conclusions reached in the Final EIR regarding physically dividing an established community or the existing character of the vicinity, and no new mitigation is required.

Land use impacts are also considered to be significant if the project would conflict with any plan, policy, or regulation adopted for the purpose and avoiding or mitigating an environmental effect. The Final EIR for the original project determined that the project would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project adopted for avoiding or mitigating an

environmental effect, resulting in a less-than-significant impact. As with the original project, the revised project would not conflict with any plan, policy, or regulation adopted for the purpose and avoiding or mitigating an environmental effect, as discussed below.

1055 Pine Street, 1069 Pine Street, 700 Montgomery Street, 2295 Taylor Street, 2340 Stockton Street, 168 Bluxome Street; 150 Hayes Street; 460 Townsend Street; and 121 Wisconsin Street

Under the revised project, 1055 Pine Street, 1069 Pine Street, 700 Montgomery Street, 2295 Taylor Street, 2340 Stockton Street, 168 Bluxome Street; 150 Hayes Street; 460 Townsend Street; and 121 Wisconsin Street would be vacated by AAU, and any outstanding change of use or conditional use authorization applications associated with these sites would be withdrawn. Because each of these properties would be vacated under the revised project, there would be no potential for their uses to conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Any future changes of use or conditional use authorization applications would be subject to separate CEQA review. This impact would continue to be less than significant. No mitigation measures are necessary. There would be no new significant or substantially more severe impacts related to conflicts with applicable land use plans, policies, or regulations of an agency with jurisdiction over the project at 1055 Pine Street, 1069 Pine Street, 700 Montgomery Street, 2295 Taylor Street, 2340 Stockton Street 168 Bluxome Street, 150 Hayes Street, 460 Townsend Street, and 121 Wisconsin Street.

1946 Van Ness Avenue (the Bakery)

1946 Van Ness Avenue is located in an RC-4 (Residential-Commercial, High Density) zoning district. Previously issued building permits established the building use as retail and/or light manufacturing. As part of the revised project, AAU proposes to convert the property for a post-secondary educational institutional use, requiring a conditional use authorization (San Francisco Planning Code section 303) to change the planning code use category of the property. However, because the uses are conditional under the planning code, they would not conflict with the planning code. As discussed under Section 4.4 below, the proposed alterations at 1946 Van Ness Avenue are minor in scope and would not conflict with regulations and policies related to historic resources. Therefore, as with the original project, the revised project would not conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect, and this impact would continue to be less than significant. No mitigation measures are necessary. There would be no new significant impacts related to conflict with applicable land use plans, policies, or regulations of an agency with jurisdiction over the project at 1946 Van Ness Avenue.

1142 Van Ness Avenue (the Concordia Club)

1142 Van Ness Avenue is located within an RC-4 (Residential-Commercial, High Density) zoning district. Previously issued building permits have established the building use as private community facility. Under the revised project, AAU proposes to use 1142 Van Ness for post-secondary educational institutional use, requiring a conditional use authorization (San Francisco Planning Code section 303) to change the planning code use category of the property. However, because the uses are conditional under the planning code, they would not conflict with the planning code. As discussed under Section 4.4 below, the proposed alterations at 1142 Van Ness Avenue are minor in scope and would not conflict with regulations and policies related to historic resources. Therefore, as with the original project, the revised project would not conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect, and this impact would continue to be less than significant. No

mitigation measures are necessary. There would be no new significant impacts related to conflict with applicable land use plans, policies, or regulations of an agency with jurisdiction over the project at 1142 Van Ness Avenue.

2550 Van Ness Avenue (the Da Vinci Hotel)

2550 Van Ness Avenue straddles two zoning districts: RM- 3 (Residential-Mixed, Medium Density), and RC-3 (Residential-Commercial, Medium Density). Previously issued building permits have established the building use as a tourist hotel/motel. Under the revised project, AAU proposes to use 2550 Van Ness as 136 units (approximately 306 beds) of student housing, including replacement housing for students vacated from the existing building at 1055 Pine Street, requiring a change of use. This change of use would require a CU authorization (San Francisco Planning Code section 303) to change the planning code use category of the property. However, because the uses are conditional under the planning code, they would not conflict with the planning code. As discussed under Section 4.4 below, the proposed alterations at 2550 Van Ness Avenue are minor in scope and would not conflict with regulations and policies related to historic resources. Therefore, as with the original project, the revised project would not conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect, and this impact would continue to be less than significant. No mitigation measures are necessary. There would be no new significant impacts related to conflict with applicable land use plans, policies, or regulations of an agency with jurisdiction over the project at 2550 Van Ness Avenue.

2801 Leavenworth Street (The Cannery)

The original project analyzed AAU's proposed use of 133,675 square feet of this site as post-secondary educational institutional use to accommodate approximately 1,600 students and 18 faculty/staff per day. There are two classroom spaces on the first floor of this building, only one of which is currently in use. At 2801 Leavenworth Street, under the revised project, AAU would modify the application to retain retail or other active ground floor uses that would be physically accessible to members of the public during the normal retail hours of operation customary in the neighborhood. This proposed change would make the revised project more consistent with Northeastern Waterfront Plan policies that prefer office uses to be above the ground floor and for active ground-floor retail uses. As discussed under Section 4.4 below, the proposed ground floor change of use at 2801 Leavenworth are minor in scope and would not conflict with regulations and policies related to historic resources. Therefore, no conflict with plans or policies would result from this change and this impact would continue to be less than significant. No mitigation measures are necessary. There would be no new significant impacts and the revised project would not conflict with applicable land use plans, policies, or regulations of an agency with jurisdiction over the project at 2801 Leavenworth Street.

2225 Jerrold Avenue

The original project analyzed AAU's proposed use as AAU office space, storage area for AAU bus operations, mechanical/janitorial functions, and other miscellaneous storage for AAU purposes, along with approximately 22,683 square feet for SFFD storage use. In addition, the original project analyzed the inclusion of an approximately 17,533 square-foot AAU basketball court and weight room for recreational purposes. Under the revised project, AAU would revise its change of use application to replace the initially proposed AAU recreational facilities with an approximately 15,084 square foot community facility that is open to the public and includes a multi-purpose recreation room and indoor and outdoor community

facility lounge spaces. This proposed change would provide for more active community uses and would not conflict with existing plans, policies, or regulations for the site. Therefore, this impact would be less than significant. No mitigation measures are necessary. There would be no new significant impacts and the revised project would not conflict with applicable land use plans, policies, or regulations of an agency with jurisdiction over the project at 2225 Jerrold Avenue.

Conclusion

The revised project would not change any of the Final EIR's findings with respect to land use and planning impacts. There is no new information of substantial importance, such as new regulations, a change of circumstances (e.g., physical changes to the environment as compared to 2016), or changes to the project that would give rise to new significant environmental effects or a substantial increase in the severity of previously identified effects. Therefore, the revised project would not change the conclusions reached in the Final EIR regarding conflicts with applicable land use plans, policies, or regulations, and no new mitigation is required. This analysis does not result in any different conclusions than those reached in the Final EIR related to land use and plans, either on a project-related or cumulative basis.

4.2 Aesthetics

The Final EIR determined that the original project would not substantially affect scenic vistas or visual resources visible from publicly accessible areas in the study areas or at the project sites, would not substantially degrade the existing visual character or quality of the sites and their surroundings, and would not create a new source of substantial light or glare which would adversely affect day or nighttime views or which would substantially impact other people or properties, resulting in less-than-significant impacts within the study areas and at the project sites. Similarly, the Final EIR determined that implementation of the original project, in combination with other past, present, and reasonably foreseeable future projects would not result in a cumulatively considerable contribution to a significant aesthetic impact. No mitigation measures were required with respect to aesthetics. The revised project would not change any of these findings, as further discussed below.

1055 Pine Street, 1069 Pine Street, 700 Montgomery Street, 2295 Taylor Street, 2340 Stockton Street, 168 Bluxome Street; 150 Hayes Street; 460 Townsend Street; and 121 Wisconsin Street

Under the revised project, AAU would vacate 1055 Pine Street, 1069 Pine Street, 700 Montgomery Street, 2295 Taylor Street, 2340 Stockton Street 168 Bluxome Street; 150 Hayes Street; 460 Townsend Street; and 121 Wisconsin Street. AAU would not make any interior or exterior modifications to these buildings and the change of use applications would be withdrawn, resulting in no additions or changes to the roofline or height and bulk of these buildings. Any future modifications or changes of use at these sites would be subject to separate CEQA review.

Therefore, because no modifications at 1055 Pine Street, 1069 Pine Street, 700 Montgomery Street, 2295 Taylor Street, 2340 Stockton Street, 168 Bluxome Street, 150 Hayes Street, 460 Townsend Street, and 121 Wisconsin Street would occur, the revised project at these locations would not result in a substantial adverse impact on a scenic vista or visual resource, would not result in a demonstrable negative change, disrupt the existing visual character within the vicinity of the project site, or have a substantial impact on existing scenic vistas, and would not create a new source of substantial light or glare that would adversely affect day or nighttime views at the project site or that would substantially impact other people or properties. There would be no impact. No mitigation measures are necessary. There would be no new

significant impacts related to aesthetics at 1055 Pine Street, 1069 Pine Street, 700 Montgomery Street, 2295 Taylor Street, 2340 Stockton Street, 168 Bluxome Street, 150 Hayes Street, 460 Townsend Street, and 121 Wisconsin Street. Therefore, the revised project would not change the conclusions reached in the Final EIR regarding aesthetics, and no new mitigation is required.

1946 Van Ness Avenue (the Bakery)

Under the revised project, AAU proposes to convert 1946 Van Ness Avenue for a post-secondary educational institutional use. The conversion for post-secondary educational institutional use would require minor modifications to the base building core and shell to bring the building into compliance with current life safety codes. Aesthetic improvements would include replacement of existing boarded storefronts with aluminum storefronts in the openings of both the west façade facing Van Ness and the North façade facing Jackson Street. On the upper floors, broken or missing windows would be replaced with clear glazing. All improvements would be compatible with the existing character defining features of the building, and would generally improve the visual character of the building.

Interior improvements would be related to the conversion of the building for post-secondary educational institutional use. More specifically, the space would be divided to accommodate a number of vocational rooms, or classrooms, to serve AAU's Industrial Design and Auto Restoration Programs, including an auto display and instructional work space. Sign proposals, floor plans and property improvements necessary for the change of use would be submitted with the Master CU application. Because the revised project would be limited to interior improvements associated with the change of use and exterior improvements designed to bring the building into compliance with safety codes and to improve its accessibility and appearance, the revised project would not result in any major additions or changes to the roofline or height and bulk of the building. There would be minimal changes to the existing lighting and changes would be limited to the replacement of existing broken, worn out, or unsafe fixtures in the interior of the building. Additionally, any installation of signs would be required to comply with the planning code. 1946 Van Ness Avenue is in a RC-4 (Residential-Commercial, High Density) zoning district and, as such, any sign installation would be required to comply with San Francisco Planning Code Article 6, Section 607.1, for signs placed in Residential-Commercial districts. Section 607.1 contains regulations designed to limit sign height, location, size, projection, and illumination controls.

Should any exterior lighting be installed in addition to what already exists, building lighting would be angled towards building surfaces for aesthetic purposes and/or to illuminate signs. Additionally, the revised project would comply with Planning Commission Resolution 9212, which prohibits the use of mirrored or reflective glass. Furthermore, because 1946 Van Ness Avenue is located in a lighted, urban area, the addition of exterior lighting as a result of the revised project would not substantially increase ambient lighting. Because the revised project would comply with Planning Commission Resolution 9212 and would minimally change the amount of lighting on site, light and glare impacts would not be expected to have a substantial, demonstrable negative aesthetic impact.

Therefore, because modifications at 1946 Van Ness Avenue would include interior improvements associated with the change of use and exterior improvements that would be consistent with the existing historic character of the building, the revised project at 1946 Van Ness Avenue would not result in a substantial adverse impact on a scenic vista or visual resource, would not result in a demonstrable negative change, disrupt the existing visual character within the vicinity of the project site, or have a substantial impact on existing scenic vistas, and would not create a new source of substantial light or glare that would

adversely affect day or nighttime views at the project site or that would substantially impact other people or properties. These impacts would be less than significant. No mitigation measures are necessary. There would be no new significant impacts related to aesthetics at 1946 Van Ness Avenue. Therefore, the revised project would not change the conclusions reached in the Final EIR regarding aesthetics, and no new mitigation is required.

1142 Van Ness Avenue (the Concordia Club)

Under the revised project, AAU proposes to convert 1142 Van Ness Avenue for a post-secondary educational institutional use. No physical improvements are proposed at 1142 Van Ness Avenue for the change of use, as the current configuration supports educational, office, and as-needed event hosting space. Sign proposals, floor plans and property improvements necessary for the change of use would be submitted with the Master CU application. Because the revised project would be limited to exterior signage, the revised project would not result in any major additions or changes to the roofline or height and bulk of the building. There would be minimal changes to the existing lighting and changes would be limited to the replacement of existing broken, worn out, or unsafe fixtures in the interior of the building. Additionally, any installation of signs would be required to comply with the planning code. 1142 Van Ness Avenue is located in a RC-4 (Residential-Commercial, High Density) zoning district and, as such, any sign installation would have to comply with San Francisco Planning Code Article 6, Section 607.1, for signs placed in Residential-Commercial districts. Section 607.1 contains regulations designed to limit sign height, location, size, projection, and illumination controls.

Should any exterior lighting be installed in addition to what already exists, building lighting would be angled towards building surfaces for aesthetic purposes and/or to illuminate signs. Additionally, the revised project would comply with Planning Commission Resolution 9212, which prohibits the use of mirrored or reflective glass. Furthermore, because 1142 Van Ness Avenue is located in a lighted, urban area, the addition of exterior lighting as a result of the revised project would not substantially increase ambient lighting. Because the revised project would comply with Planning Commission Resolution 9212 and would minimally change the amount of lighting on site, light and glare impacts would not be expected to have a substantial, demonstrable negative aesthetic impact.

Therefore, because no physical modifications are proposed at 1142 Van Ness Avenue beyond new furnishing, signage, and lighting, the revised project at 1142 Van Ness Avenue would not result in a substantial adverse impact on a scenic vista or visual resource, would not result in a demonstrable negative change, disrupt the existing visual character within the vicinity of the project site, or have a substantial impact on existing scenic vistas, and would not create a new source of substantial light or glare that would adversely affect day or nighttime views at the project site or that would substantially impact other people or properties. These impacts would be less than significant. No mitigation measures are necessary. There would be no new significant impacts related to aesthetics at 1142 Van Ness Avenue. Therefore, the revised project would not change the conclusions reached in the Final EIR regarding aesthetics, and no new mitigation is required.

2550 Van Ness Avenue (the Da Vinci Hotel)

Under the revised project, AAU proposes to use 2550 Van Ness Avenue (the Da Vinci Hotel) as 136 units (approximately 306 beds) of student housing, including replacement housing for students vacated from the existing building at 1055 Pine Street. Sign proposals, floor plans and property improvements necessary for

the change of use would be submitted with the Master CU application. This would require a change of use approval. The only interior changes at the property would be replacing hotel furnishings with dormitory furnishings. Because the revised project would be limited to interior improvements associated with the change of use and exterior signage, the revised project would not result in any major additions or changes to the roofline or height and bulk of the building. There would be minimal changes to the existing lighting and changes would be limited to the replacement of existing broken, worn out, or unsafe fixtures in the interior of the building. Additionally, any installation of signs would be required to comply with the planning code. 2550 Van Ness Avenue is located in two zoning districts, RM-3 (Residential-Mixed, Medium Density), and RC-3 (Residential-Commercial, Medium Density) and, as such, any sign installation would have to comply with San Francisco Planning Code Article 6, Section 606 and Section 607.1, for signs placed in Residential-Mixed and Residential-Commercial districts. Section 606 and Section 607.1 contains regulations designed to limit sign height, location, size, projection, and illumination controls.

Should any exterior lighting be installed in addition to what already exists, building lighting would be angled towards building surfaces for aesthetic purposes and/or to illuminate signs. Additionally, the revised project would comply with Planning Commission Resolution 9212, which prohibits the use of mirrored or reflective glass. Furthermore, because 2550 Van Ness Avenue is located in a lighted, urban area, the addition of exterior lighting as a result of the revised project would not substantially increase ambient lighting. Because the revised project would comply with Planning Commission Resolution 9212 and would minimally change the amount of lighting on site, light and glare impacts would not be expected to have a substantial, demonstrable negative aesthetic impact.

Therefore, because modifications at 2550 Van Ness Avenue would include minor interior improvements associated with the change of use and exterior signage, the revised project at 2550 Van Ness Avenue would not result in a substantial adverse impact on a scenic vista or visual resource, would not result in a demonstrable negative change, disrupt the existing visual character within the vicinity of the project site, or have a substantial impact on existing scenic vistas, and would not create a new source of substantial light or glare that would adversely affect day or nighttime views at the project site or that would substantially impact other people or properties. These impacts would be less than significant. No mitigation measures are necessary. There would be no new significant impacts related to aesthetics at 2550 Van Ness Avenue. Therefore, the revised project would not change the conclusions reached in the Final EIR regarding aesthetics, and no new mitigation is required.

2801 Leavenworth Street (the Cannery)

2801 Leavenworth Street has an Article 10 rating as a "Structure of Merit" and a Planning Department Historic Resource Status of "A" (Known Historic Resource) and is therefore considered a visual resource. The closest visual resources to 2801 Leavenworth Street are the San Francisco Bay and shoreline, which are not visible from any ground level public viewing areas in the immediate vicinity of the building.

The revised project would modify the application for 2801 Leavenworth Street to retain retail or other active ground floor uses that would be physically accessible to members of the public during the normal retail hours of operation customary in the neighborhood. Retail uses could include AAU art galleries with space for rotating art exhibitions and fine art sales. Because the revised project would be limited to interior improvements associated with the proposal, the revised project would not result in any major additions or changes to the roofline, height, and bulk of the building, or exterior modifications to the building. There would be minimal changes to the existing lighting and changes would be limited to installation of

temporary partitions and the replacement of existing broken, worn out, or unsafe fixtures in the interior of the building.

Therefore, because modifications at 2801 Leavenworth Street would include only interior changes resulting from the proposal, the revised project at 2801 Leavenworth Street would not result in a substantial adverse impact on a scenic vista or visual resource, would not result in a demonstrable negative change, disrupt the existing visual character within the vicinity of the project site, or have a substantial impact on existing scenic vistas, and would not create a new source of substantial light or glare that would adversely affect day or nighttime views at the project site or that would substantially impact other people or properties. These impacts would be less than significant. No mitigation measures are necessary. There would be no new significant impacts related to aesthetics at 2801 Leavenworth Street. Therefore, the revised project would not change the conclusions reached in the Final EIR regarding aesthetics, and no new mitigation is required.

2225 Jerrold Avenue

2225 Jerrold Avenue is one of the project sites identified in the Final EIR that received a project-level analysis. 2225 Jerrold Avenue is in the Bayview Hunters Point neighborhood in a heavy industrial area. The flat project site contains a warehouse and parking facilities in the front and rear of the warehouse. The area immediately surrounding the project site is visually defined by light industrial, one to two-story warehouses and open storage yards. The project site is not a historical resource.

The original project analyzed AAU's proposed use as AAU office space, storage area for AAU bus operations, mechanical/janitorial functions, and other miscellaneous storage for AAU purposes, along with approximately 22,683 square feet for SFFD storage use. In addition, the original project analyzed the inclusion of an approximately 17,533 square-foot AAU basketball court and weight room for recreational purposes. Under the revised project, AAU will revise its change of use application to replace the initially proposed AAU recreational facilities with an approximately 15,084 square foot community facility that is open to the public and includes a multi-purpose recreation room and indoor and outdoor community facility lounge spaces.

Because the revised project would be limited to interior improvements associated with the proposal, the revised project would not result in any substantial additions or changes to the roofline, height, and bulk of the building, or exterior modifications to the building. There would be minimal exterior modifications related to safe pedestrian and bicycle infrastructure to provide access to amenities and the community facility uses in the building. However, these exterior changes would not result in a substantial adverse impact on a scenic vista or visual resource, would not result in a demonstrable negative change, disrupt the existing visual character within the vicinity of the project site, or have a substantial impact on existing scenic vistas, and would not create a new source of substantial light or glare that would adversely affect day or nighttime views at the project site or that would substantially impact other people or properties. These impacts would be less than significant. No mitigation measures are necessary. There would therefore be no new significant impacts related to aesthetics at 2225 Jerrold Avenue. Therefore, the revised project would not change the conclusions reached in the Final EIR regarding aesthetics, and no new mitigation is required.

Conclusion

The revised project would not change any of the Final EIR's findings with respect to aesthetics impacts. There is no new information of substantial importance, such as new regulations, a change of circumstances (e.g., physical changes to the environment as compared to 2016), or changes to the project that would give rise to new significant environmental effects or a substantial increase in the severity of previously identified effects. Therefore, the revised project would not result in a substantial adverse impact on a scenic vista or visual resource, would not result in a demonstrable negative change, disrupt the existing visual character within the vicinity of the project site, or have a substantial impact on existing scenic vistas, and would not create a new source of substantial light or glare that would adversely affect day or nighttime views at the project site or that would substantially impact other people or properties, and these impacts would be less than significant. This analysis does not result in any different conclusions than those reached in the original project EIR related to aesthetics, either on a project-related or cumulative basis.

4.3 Population, Housing, and Employment

The Final EIR determined that the original project would not induce substantial population growth in an area, either directly or indirectly, resulting in a less-than-significant impact within the study areas and at the project sites. However, the original project was determined to result in a significant and unavoidable impact in the study areas and at the project sites through displacement of substantial numbers of people, or existing housing units, or through the creation of demand for additional housing, necessitating the construction of replacement housing elsewhere. No mitigation measures were required.

As discussed in Section 2.1, the original project analyzed a projected on-site (full-time and part-time students taking at least one course in San Francisco) enrollment of 17,282 students by 2020, which represented an increase of 5 percent per year, starting with a 2010 on-site enrollment of 11,182. This projected enrollment would represent an increase of 6,100 students between 2010 and 2020. Actual enrollment is significantly lower than would have occurred under the Final EIR's assumed rate of growth. Based on the rate of growth assumed under the original project, on-site enrollment would have been 16,062 students in 2018. Actual on-site enrollment in fall 2018 was 6,710 students. Thus, actual enrollment is less than 50 percent of the projected enrollment analyzed in the Final EIR. Table 3 provides additional information on projected versus actual enrollment.

The original project studied an additional 400 beds of student housing, resulting in a total future capacity of 2,210 beds. As noted above under Student Enrollment, AAU currently operates approximately 1,810 beds in its student housing. Based on recent enrollment trends, the revised project includes an assumed growth rate of approximately 3 percent per year through 2022. Under the revised project, the relocation of student housing from 1055 Pine (155 beds) to 2550 Van Ness (306 beds) would result in an increase of 151 beds. However, with the removal of 168 Bluxome Street, which currently provides 219 beds, the revised project would result in a net increase of approximately 29 beds for a total capacity of approximately 1,839 beds.

Population Growth

Due to the substantial decrease in projected enrollment, all potential population impacts under the revised project would be less than the impacts analyzed in the Final EIR. None of the changes of use or permit withdrawals at the project sites would affect the projected AAU enrollment or contribute to population or

job growth beyond what was analyzed in the Final EIR. The growth in population and jobs that would result from the revised project have been anticipated and accommodated by local and regional plans, as specified in the Final EIR. Therefore, the revised project would not be expected to induce substantial population or employment growth, either directly or indirectly, and this impact would be less than significant. No mitigation measures are necessary. There would be no new significant impacts related to population growth at any of the project sites. Therefore, the revised project would not change the conclusions reached in the Final EIR regarding population growth, and no new mitigation is required.

Housing Demand

Impacts under the revised project would be less than those described for the original project due to the decreases in existing and projected enrollment as compared to that analyzed in the Final EIR. The Final EIR determined that the original project would result in approximately 5,400 new residents to the city, creating substantial demand of approximately 2,203 units of housing in San Francisco. The relocation of student housing from 1055 Pine (155 beds) to 2550 Van Ness (306 beds) would result in a net increase of 151 beds; however, AAU would also withdraw from 168 Bluxome Street, which currently provides 219 beds Ultimately, the revised project would result in a net increase of 29 beds for a total capacity of 1,839 beds, which would help reduce the revised project's impact on housing.

As described above under section 2.2.1, the following commitments (implemented either by limiting enrollment or developing new code-compliant student housing, including any required CEQA review) will be documented in the Development Agreement regarding the provision of student housing in the future, subject to the process described in the Development Agreement for deferring these increases if occupancy rates do not support them:

- By July 1, 2022, AAU will house in San Francisco at least 36 percent of its full-time students taking up to one class online; and
- By July 1, 2023, AAU will house in San Francisco at least 38 percent of it full-time students taking no more than one class online.

After July 1, 2023, the Academy will use good faith efforts to house in San Francisco at least 45 percent of its full-time students taking no more than one class online. The revised project would result in a net increase of 29 beds for a total capacity of 1,839 beds for student housing. As a result, despite the commitments by AAU to provide housing for its on-campus students, as described above, the revised project's impact upon housing would remain significant and unavoidable as determined by the EIR. The revised project would continue to create a substantial demand for additional housing, although the demand would be less than what was analyzed in the Final EIR due to the decreases in existing and projected enrollment. As with the original project, the addition of residential uses to sufficiently mitigate this impact or reduction of institutional growth sufficient to avoid any increase in housing demand would fundamentally alter the revised project. As a result, there is no feasible mitigation for this impact. Therefore, as with the original project, the revised project's impact on housing demand would be significant and unavoidable. The revised project would not change the conclusions reached in the Final EIR regarding housing demand.

Displacement

Business displacement would not occur at 1055 Pine Street or 1069 Pine Street, or at 700 Montgomery Street, 2295 Taylor Street, 2340 Stockton Street, 150 Hayes, 460 Townsend, and 121 Wisconsin, because any existing

AAU employees at these locations would be transferred to a different AAU location within San Francisco. The revised project would change the use at 1946 Van Ness Avenue, 1142 Van Ness Avenue, and 2550 Van Ness Avenue. However, the building at 1946 Van Ness is currently vacant and no existing businesses would be displaced; and there are no existing businesses at 1142 Van Ness. 2550 Van Ness Avenue is currently used as a tourist hotel, so an existing business would be displaced when AAU occupies this site. However, the number of employees displaced at this location would not be substantial, and these employees would be expected to locate similar work elsewhere in San Francisco. At 2801 Leavenworth Street, the revised project would modify the application to retain retail or other active ground floor uses; no businesses would be displaced, as the space that AAU would occupy is currently vacant. Therefore, as with the original project, implementation of the revised project at these locations would not displace a substantial number of people or businesses, and this impact would be less than significant. No mitigation measures are necessary. There would be no new significant impacts related to displacement at any of the project sites. Therefore, the revised project would not change the conclusions reached in the Final EIR regarding displacement, and no new mitigation is required.

Conclusion

Although the revised project would still result in a significant and unavoidable impact with regard to a substantial demand for housing, it would not change any of the Final EIR's findings with respect to population, housing, and employment impacts. As discussed above, there is no new information of substantial importance, such as new regulations, a change of circumstances (e.g., physical changes to the environment as compared to 2010), or changes to the project that would give rise to new significant environmental effects or a substantial increase in the severity of previously identified significant effects. This analysis does not result in any different conclusions than those reached in the Final EIR related to population, housing, and employment, either on a project-related or cumulative basis.

4.4 Cultural and Paleontological Resources

The Final EIR concluded that the original project would not result in a substantial adverse change in the significance of historical resources either within the study areas or at the project sites. The Final EIR also determined that the original project would not cause a substantial adverse change in the significance of archaeological resources and human remains at the project level; and could cause a substantial adverse change in the significance of archaeological resources and human remains within the study areas and at the project sites with implementation of a Mitigation Measure M-CP-2.1 that would require preparation of project-specific preliminary archeological assessments for future projects involving soils-disturbing or soils-improving activities. The Final EIR also determined that the original project would not directly or indirectly destroy a unique paleontological resource or site or unique geological feature. Furthermore, the Final EIR determined that the original project would not result in a cumulatively considerable contribution to a significant cumulative historical, archaeological, or paleontological resources impact, or to a significant cumulative disturbance of human remains. The revised project would not change any of these findings, as further discussed below.

1055 Pine Street and 1069 Pine Street

1055 Pine Street and 1069 Pine Street were not among the six project sites analyzed for project-level growth in the Final EIR nor are they located within one of the 12 study areas analyzed for program-level growth. Thus, the Final EIR did not consider project activities at these two sites with regards to cultural and

paleontological resource impacts. 1055 Pine Street and 1069 Pine Street were analyzed in the ESTM, which, as noted above, was prepared by the city to assess any potential effects that resulted from previous unauthorized changes of uses and/or appearance at AAU's 34 existing sites and to discuss the required legalization approvals for these sites.

Under the revised project, AAU would vacate the six-story building at 1055 Pine Street and the one-story building at 1069 Pine Street. The 155 beds currently provided at 1055 Pine Street would be relocated to the Da Vinci Hotel at 2550 Van ness Avenue (see discussion below). The 1069 Pine Street building contains a small gymnasium which would be relocated to an existing, similarly-sized gymnasium at 1142 Van Ness Avenue (the site of the former Concordia Club). Future uses at 1055 Pine Street and 1069 Pine Street are unknown at this time; however, changes of use and/or physical modifications at both buildings would be subject to all applicable San Francisco codes and, if required, appropriate California Environmental Quality Act (CEQA) review at the time such changes (if any) are proposed.

Historical Resources

1055 Pine Street is a six-story, Classical Revival-style building constructed in 1910 as a hospital facility. According to the planning department's online Property Information Map,[14] 1055 Pine Street was determined to be eligible for listing in the National Register of Historic Places in 2002 through the Section 106 review process. This determination was concurred with by the California State Historic Preservation Officer, and the building is listed in the California Register of Historical Resources (CRHR). Thus 1055 Pine Street qualifies as a historical resource for the purposes of CEQA review.

1069 Pine Street is a one-story, rectangular plan commercial building constructed in 1921. A Historic Resource Evaluation (HRE) Part 1 completed in May 2016 by SWCA Environmental Consultants recommended that 1069 Pine Street does not appear to be eligible for listing in the CRHR under any criterion, and this was finalized in the ESTM. Thus, 1069 Pine Street does not qualify as a historical resource for the purposes of CEQA review. Furthermore, the project site is not located within a CRHR-listed or –eligible historic district, such that new construction in the location of 1069 Pine Street would not have the potential to cause an impact to historic districts.

As noted, with vacation of the buildings at 1055 Pine Street and 1069 Pine Street, their future disposition is unknown. As stated in the Final EIR, future activities related to the implementation of the project that involve alterations to CEQA historical resources would undergo project-specific environmental review, as administered by the planning department. If required, modifications would be analyzed for adherence to the *Secretary of the Interior's Standards for Rehabilitation* (Secretary's Standards),[15] and prior to the issuance of building permits, the revised project would be subject to standard CEQA review procedures for historical resources.[16] For the purposes of the present analysis, the revised project to vacate 1055 Pine Street would not involve physical changes to the building's character-defining features. 1069 Pine Street is not considered a historic resource, and thus the revised project at 1055 Pine Street and 1069 Pine Street would

[14] San Francisco Planning Department *Property Information Map*, available online at: http://propertymap.sfplanning.org/. Accessed March 8, 2018.

[15] The Secretary of the Interior's *Standards for the Treatment of Historic Properties* are used by federal and state agencies, local governments, organizations and individuals in making decisions about the identification, evaluation, registration and treatment of historic properties.

[16] The building permit application and full plans for 1055 Pine Street were filed on February 2, 2018 (BPA 201802020222).

not change the conclusion reached in the Final EIR that the project would not cause a significant impact related to historical resources. No new mitigation is required.

Archaeological Resources, Paleontological Resources, and Human Remains

As the revised project would not involve any ground disturbing activities at 1055 Pine Street and 1069 Pine Street that were not analyzed in the Final EIR, the revised project would not change the conclusion reached in the Final EIR that the project would not cause a significant impact related to archaeological resources, paleontological resources, and human remains. No new mitigation is required.

700 Montgomery Street, 2295 Taylor Street, 2340 Stockton Street, 168 Bluxome Street, 150 Hayes Street, 460 Townsend Street, and 121 Wisconsin Street

700 Montgomery Street, 150 Hayes Street, and 121 Wisconsin Street were among the six project sites that received project-level analysis in the Final EIR. The 700 Montgomery Street project described in the Final EIR involved the conversion of the site to accommodate classroom, office, and restaurant space. The original project also proposed new signage at the Washington Street and Montgomery Street façades and interior tenant improvements, including interior construction and system upgrades. The 150 Hayes Street project described in the Final EIR involved the conversion of the site to accommodate offices for AAU use, potential classroom space, and parking; new signage for the site was also analyzed. The 121 Wisconsin Street project described in the Final EIR involved changes to accommodate the use of the site as a bus storage yard, lounge, office, restroom, and storage space; at full occupancy, the site would accommodate approximately two staff in the trailers and 30 shuttle buses.

While 2295 Taylor Street, 2340 Stockton Street, 168 Bluxome Street, and 460 Townsend Street were included in the ESTM, only the legalization of previous changes in use or appearance at these sites was considered in the Final EIR. Thus, the Final EIR did not consider project activities at 2295 Taylor Street,2340 Stockton Street, 168 Bluxome Street, and 460 Townsend Street with regards to cultural and paleontological resource impacts.

As part of the revised project, AAU would vacate the building at 700 Montgomery Street and would withdraw the active CU and Certificate of Appropriateness applications associated with the property. AAU would also vacate the buildings at 2295 Taylor Street, 2340 Stockton Street, 168 Bluxome Street, 150 Hayes, 460 Townsend Street, and 121 Wisconsin Street and would withdraw any respective CU and change of use applications associated with the properties.

Historical Resources

700 Montgomery Street, a three-story Classical Revival-style building, was constructed in 1904–1905 as the Columbus Savings Bank. The building was designated as city Landmark #212 under Article 10 of the planning code. Additionally, the building is listed as a contributor to the Jackson Square Historic District, which is listed under Article 10 and in the National Register of Historic Places (NRHP) and CRHR. For these reasons, 700 Montgomery Street qualifies as a historical resource for the purposes of CEQA review. The Final EIR reported that the Planning Department prepared a Historic Resource Evaluation Response (HRER) for the proposed project, which determined that the exterior signage and interior improvements would adhere to the Secretary's Standards and thus would have a less-than-significant impact on 700 Montgomery Street and the Jackson Square Historic District for the purposes of CEQA review. No mitigation measures were incorporated.

150 Hayes Street is the former American Automobile Association building that was constructed in 1959. The six-story, rectangular-plan, concrete-framed building features glass and metal spandrel curtain walls on the front façade and metal curtain walls on the remainder. A historic resource evaluation was conducted for the site in compliance with the National Historic Preservation Act of 1966 and determined that 150 Hayes Street is not a historical resource and not eligible for listing in the NRHP and CRHR. Because the site is not a historical resource for the purposes of CEQA and because the proposed project involved a change of use and exterior modifications were limited, the Final EIR determined that the project would not have a significant impact historical resources.

121 Wisconsin Street is used as a bus parking lot. Two trailers and a small shed, all less than 50 years old, are present on-site and none hold or merit local, state, or federal designation as a historical resource. Therefore, 121 Wisconsin Street is not a historical resource under CEQA and the project would have no impact on historical resources.

2295 Taylor Street is a two-story, Mission Revival-style, concrete building constructed in 1919 as an automobile garage. 2295 Taylor Street was documented at the reconnaissance level in the c.1980s North Beach Survey and identified as a contributor to the North Beach Historic District. However, the building does not appear to have received a comprehensive historic resource evaluation at that time. The ESTM considered the CRHR eligibility of 2295 Taylor Street and determined that the building does not retain integrity, as many of its original character-defining features have been removed. Consequently, the ESTM determined that 2295 Taylor Street does not appear to be eligible for listing in the CRHR under any criterion. Thus, 2295 Taylor Street does not qualify as a historical resource for the purposes of CEQA review.

2340 Stockton Street is a three-story, modern-style building designed by the architectural firm Wurster, Bernardi, and Emmons and constructed in 1970 to provide administrative facilities for the Otis Elevator Company. As described in the ESTM, 2340 Stockton Street has not been listed in, or found eligible for listing in, any historical register. An HRE Part 1 completed in May 2016 by SWCA Environmental Consultants found that 2340 Stockton Street does not appear to be eligible for listing in the CRHR under any criterion, and this determination was finalized in the ESTM. Thus, 2340 Stockton Street does not qualify as a historical resource for the purposes of CEQA review.

168 Bluxome Street is currently used for student housing. The university has leased 61 units at 168 Bluxome for use as student housing for approximately 219 students. This property contains live/work lofts. Each unit features a private kitchen and bath. The building has a Manager's office, a recreation room and a study room. 168 Bluxome Street was surveyed in the adopted South of Market Area historic Resource Survey and found to not be a historical resource.

460 Townsend Street is a two-story, rectangular warehouse building constructed in 1915 that was used as a wholesale facility prior to AAU's occupation in 2009. After AAU moved into the building, the site was used for classrooms, labs, studios, offices, and student and faculty lounges. 460 Townsend Street is a relatively modest industrial warehouse property and one of a number of similar properties in the neighborhood. As a result, the property does not appear individually eligible for the CRHR. However, the site was previously found to be a contributor to the locally eligible Bluxome and Townsend Warehouse Historic District identified in the adopted South of Market Area Historic Resource Survey. At the local level, the property derives its significance as part of a cohesive grouping of related industrial/warehouse buildings in the area. As the building still exhibits many of the features that convey the significance of the

district, the property retains sufficient historic integrity. Thus, for the purposes of CEQA, 460 Townsend Street is considered a historical resource.

Because no physical alterations of 700 Montgomery Street and 460 Townsend Street or their immediate surroundings would occur under the revised project and AAU would withdraw its use of these sites, the revised project would not cause impacts on the characteristics that qualify 700 Montgomery Street for listing as an Article 10 city landmark or impair the historic resource status of the Jackson Square Historic District. Similarly, the revised project would not cause impacts on the characteristics that qualify 460 Townsend Street as a contributor to a locally eligible historic district. Therefore, the revised project scope at 700 Montgomery Street and 460 Townsend Street would not change the conclusion reached in the Final EIR that the project would not cause a significant impact related to historical resources.

Because no physical alterations of 2295 Taylor Street, 2340 Stockton Street, 150 Hayes Street, 168 Bluxome, and 121 Wisconsin Street or these properties' immediate surroundings would occur under the revised project and AAU would withdraw its use of these sites, and because these properties are not historical resources under CEQA, the revised project at 2295 Taylor Street, 2340 Stockton Street, 150 Hayes Street, 168 Bluxome, and 121 Wisconsin Street would not change the conclusion reached in the Final EIR that the project would not cause a significant impact related to historical resources. No new mitigation is required.

Archaeological Resources, Paleontological Resources, and Human Remains

As the revised project would not involve any ground disturbing activities at 700 Montgomery Street, 2295 Taylor Street, 2340 Stockton Street, 168 Bluxome, 150 Hayes, 460 Townsend, and 121 Wisconsin that were not analyzed in the Final EIR, the revised project scope at the three project sites would not change the conclusion reached in the Final EIR that the project would not cause a significant impact related to archaeological resources, paleontological resources, and human remains.

1946 Van Ness Avenue (the Bakery)

The original project did not include any project-level activities at 1946 Van Ness Avenue, nor is the building located within one of the 12 study areas. Thus, the Final EIR did not consider project activities at 1946 Van Ness Avenue in program-level or project-level analysis with regards to cultural and paleontological resource impacts.

As part of the revised project, 1946 Van Ness Avenue would be converted for post-secondary educational institutional use. The proposed scope of work includes installation of new aluminum storefronts with tempered glass in the existing openings for both the Van Ness Avenue and Jackson Street facades. On the upper floors, broken or missing windows would be repaired or replaced, as appropriate, to match existing glazing. Further repair includes the in-kind replacement of doors on Jackson Street, restoration of prior window replacements with windows to match in material and design, and removal of mechanical features, such as ventilation flues, and general maintenance of the property. Improvements to the 1946 Van Ness Avenue property would be consistent with the Secretary's Standards. Interior alterations include the construction of partition walls, introduction of new sanitary facilities, construction of interior stairs, and other tenant improvements to support its institutional use.

Historical Resources

1946 Van Ness Avenue is a three-story building constructed in 1920 by the firm MacDonald and Kahn, an engineering and contracting firm, for Leon Lewin, a coffee importer. The building originally housed the California-Oakland Motor Company, an automobile dealership. In 1938, the building was converted for use as the Ahrens Bakery, which it housed until the 1980s. 1946 Van Ness Avenue was documented via Department of Parks and Recreation forms in 2010 as part of the Automotive Support Structures Survey conducted by William Kostura. The 2010 recordation determined that 1946 Van Ness Avenue appears eligible for listing in the CRHR under Criterion 3 (Architecture). The San Francisco Historic Preservation Commission adopted the findings of the Automotive Support Structures Survey; thus 1946 Van Ness Avenue qualifies as a historical resource for the purposes of CEQA review.

The reinforced concrete building is three stories in height and clad in scored stucco to resemble masonry. The building derives its architectural expression from the rhythm and proportions of its bays, the skeletal treatment of the upper stories, and its details and texturing, with a ground story featuring a storefront system along Van Ness Avenue and the northwest corner of Jackson Street capped by a simple cornice. The upper floors feature window bays with a three-by-three grid of steel windows, each featuring three-over-three mullion divisions. Analysis by William Kostura in 2010 found that the property is significant under Criterion 3 (Architecture), as a notable example of reinforced concrete construction by MacDonald and Kahn, an important firm of engineers and contractors.[17] 1946-1960 Van Ness is the surviving building that best exemplifies Kahn's architectural philosophy of uniting utility with beauty through clarity of expression and a restrained use of ornament. The period of significance for the property is 1920, the date of construction.

The character defining features of this building are its height and width, its scored stucco surface, all of its industrial steel sash windows, the parapet, the cornices at the base of the parapet and at the second floor level, the molding and piers that frame the bays, the storefront windows with their frames in the first story, and the wooden vehicle entrance doors on the Jackson Street side of the building. No interior features were found to be significant.

As described above, the revised project is anticipated to include installation of new matte powder coat or similar finish aluminum storefronts with tempered glass in the existing openings for both the Van Ness and Jackson Street facades. On the upper floors, broken or missing windows would be replaced with clear glazing to match existing glazing. Further repair includes restoration of prior window replacements with windows to match in material and design, removal of mechanical features, such as ventilation flues, and general maintenance of the property. The wooden vehicle entrance doors on Jackson Street would be replaced in kind. The revised project would be fully in compliance with the Secretary's Standards, as all work would be restorative in nature and preserve the greatest amount of historic fabric as possible.[18] As such, the revised project would not have the potential to affect any adjacent known historic resources. Physical alterations at 1946 Van Ness Avenue would be in compliance with the Secretary's Standards and

[17] Kostura, William. 2010. "1946-1960 Van Ness Avenue." State of California Department of Parks and Recreation Primary Record and Building, Structure, and Object Record. *Van Ness Auto Row Support Structures*. San Francisco: San Francisco Department of City Planning.

[18] San Francisco Planning Department, *Preservation Team Review Form for 1946 Van Ness Avenue*, February 22, 2018.

would not change the conclusion reached in the Final EIR that the project would not cause a significant impact related to historical resources. No new mitigation is required.

Archaeological Resources, Paleontological Resources, and Human Remains

As the revised project would not involve any ground disturbing activities at 1946 Van Ness Avenue that were not analyzed in the Final EIR, the project scope proposed at 1946 Van Ness Avenue would not change the conclusion reached in the Final EIR that the project would not cause a significant impact related to archaeological resources, paleontological resources, and human remains. No new mitigation is required.

1142 Van Ness Avenue (the Concordia Club)

The Final EIR did not propose any project activities at 1142 Van Ness Avenue. The building, however, is located within SA-3, one of the 12 study areas analyzed for program-level growth. The Final EIR proposed a change of use for buildings within SA-3 to provide up to approximately 400 beds of student housing. The Final EIR did not identify specific buildings within the study areas where project-related activities would occur, and thus did not determine specific impacts on cultural and paleontological resources within SA-3. Rather, the Final EIR assumed that the building(s) selected for change in use under the proposed project would undergo tenant improvements, such as interior construction, systems upgrades, and exterior signage, in addition to possible scopes of work such as seismic strengthening, window and lighting replacement, and the installation of exterior awnings and lighting, and analyzed the general effects associated with these types of improvements.

As part of the revised project, 1142 Van Ness Avenue would be converted for post-secondary educational institutional use. Physical improvements at 1142 Van Ness Avenue to accommodate the change of use include gate and door replacements, security camera relocation, and the installation of new signage. The proposed alterations would be fully compliant with the Secretary's Standards.

Historical Resources

1142 Van Ness Avenue is a three-story, Classical Revival-style building constructed in 1909 and characterized by a two-part façade composition. At the primary (Van Ness) façade, the upper two stories feature three rounded windows flanked by projecting piers at the corners of the building. 1142 Van Ness Avenue is identified as a "significant building" in the Van Ness Area Plan, which qualifies it as a historical resource for the purposes of CEQA review.

The Final EIR reported that the city prepared an HRER for program-level growth in 2013 that determined the proposed project would not result in substantial adverse change to historical resources within SA-3. The Final EIR stated that the proposed program-level activities constitute scopes of work that would involve minimal impacts on the significant architectural features of identified historical resources, and thus the project would have a low potential of materially impairing the character-defining features of any historical resource within Study Area-3. Physical alterations at 1142 Van Ness Avenue would be limited to the installation of new signage, requiring standard city review procedures, and would not change the conclusion reached in the Final EIR that the project would not cause a significant impact related to historical resources. No new mitigation is required.

Archaeological Resources, Paleontological Resources, and Human Remains

The Final EIR determined that the original project had the potential to cause a significant impact on archaeological resources and human remains within the study areas and at the project sites, because specific future project activities associated with the change of use of AAU buildings within the 12 study areas were not known. The Final EIR specified that the incorporation of Mitigation Measure M-CP-2.1, requiring a project-specific preliminary archaeological assessment for individual project components involving ground-disturbing activities within the 12 studies areas, would ensure the project's impact on archaeological resources and human would be less-than-significant level. Furthermore, the Final EIR stated that it was not anticipated that the original project would involve more than minor excavation (no soil disturbance lower than 10 feet below ground surface). As a result, the Final EIR concluded that proposed project activities in the 12 study areas would result in a less-than-significant impact on paleontological resources. No mitigation measures were incorporated for impacts on paleontological resources.

As the revised project would not involve any ground disturbing activities at 1142 Van Ness Avenue that were not analyzed in the Final EIR, the project scope proposed at 1142 Van Ness Avenue would not change the conclusion reached in the Final EIR that the project would not cause a significant impact related to archaeological resources, paleontological resources, and human remains. Additionally, as no ground disturbing activities are proposed, the revised project would not require the application of Mitigation Measure M-CP-2.1. No new mitigation is required.

2550 Van Ness Avenue (the Da Vinci Hotel)

The Final EIR did not propose any project activities at 2550 Van Ness Avenue. The building, however, is located within SA-2, one of the 12 study areas analyzed for program-level growth. The Final EIR proposed a change of use for buildings within SA-2 to provide up to approximately 400 beds of student housing. The Final EIR did not identify specific buildings where specific project-related activities would occur, and thus did not determine specific impacts on cultural and paleontological resources within SA-2. Rather, the Final EIR assumed that the building(s) selected for change in use under the proposed project would undergo tenant improvements, such as interior construction, systems upgrades, and exterior signage, in addition to possible scopes of work such as seismic strengthening, window and lighting replacement, and the installation of exterior awnings and lighting, and analyzed the general effects associated with these types of improvements.

As part of the revised project, 2550 Van Ness Avenue would be leased by AAU and would undergo a change of use from tourist hotel to group student housing. Proposed exterior improvements include new signage. No other exterior or interior physical improvements are proposed at 2550 Van Ness Avenue to accommodate the change of use.

Historical Resources

2550 Van Ness Avenue is a mid-century modern-style motel building constructed in 1959. A Draft HRE Part 1 completed in November 2017 by ICF found that 2550 Van Ness Avenue does not appear to be eligible for listing in the CRHR under any criterion.[19] The Planning Department has prepared a Preservation Team

[19] ICF. 2017. *2550 Van Ness Avenue, San Francisco Historic Resource Evaluation Part 1*. Draft. November 2017. San Francisco, CA. Prepared for the Academy of Art University, San Francisco, CA.

Review Form, dated February 6, 2018, that accepts the findings of the 2017 HRE Part 1.[20] Thus, 2550 Van Ness Avenue does not qualify as a historical resource for the purposes of CEQA review.

Because 2550 Van Ness Avenue is not a historical resource under CEQA, the project scope at 2550 Van Ness Avenue would not change the conclusion reached in the Final EIR that the project would not cause a significant impact related to historical resources. No new mitigation is required.

Archaeological Resources, Paleontological Resources, and Human Remains

The Final EIR determined that the proposed project had the potential to cause a significant impact on archaeological resources and human remains at the program level, as well as at the program level combined with project-level activities, because future project activities associated with the change of use of AAU buildings within the 12 study areas were not definitely known. The incorporation of Mitigation Measure M-CP-2.1, requiring a project-specific preliminary archaeological assessment for individual project components involving ground-disturbing activities within the 12 studies areas, reduced the project's impact on archaeological resources and human remains to a less than significant level. Furthermore, the Final EIR stated that it was not anticipated that the original project would involve more than minor excavation (no soil disturbance lower than 10 feet below ground surface). As a result, the Final EIR concluded that proposed project activities in the 12 study areas would result in a less-than-significant impact on paleontological resources. No mitigation measures were incorporated for paleontological resources.

As the revised project would not involve any ground disturbing activities at 2550 Van Ness Avenue that were not analyzed in the Final EIR, the revised project proposed at 2550 Van Ness Avenue would not change the conclusion reached in the Final EIR that the project would not cause a significant impact related to archaeological resources, paleontological resources, and human remains. Additionally, as no ground disturbing activities are proposed, the revised project would not require the application of Mitigation Measure M-CP-2.1. No new mitigation is required.

2801 Leavenworth Street (the Cannery)

2801 Leavenworth Street was one of the project sites identified in the Final EIR that received a project-level analysis. The project described in the Final EIR involved the conversion of the building's retail use to accommodate classroom, office, restaurant, and event spaces. Proposed exterior alterations included installation of signage in various locations at the Leavenworth Street, Jefferson Street, and Beach Street façades. Proposed alterations not visible from the public right-of-way included general tenant improvements, repairs, and systems upgrades.

As part of the revised project, AAU would modify the change of use application in order to retain publicly accessible retail or other uses at the ground floor. Additional details are not currently available regarding the interior tenant improvements that would occur in order to support the proposed uses of the building.

Historical Resources

The building at 2801 Leavenworth Street, also referred to as the Cannery, is a three-story brick industrial building constructed in 1907-1909 and used as a fruit canning facility until 1936. The Cannery was

[20] San Francisco Planning Department, *Preservation Team Review Form for 2550 Van Ness Avenue*, February 6, 2018.

rehabilitated in the late 1960s by modernist architect Joseph Esherick, involving numerous interventions to the property. The Junior League of San Francisco surveyed the building and included it in the book *Here Today: San Francisco's Architectural Heritage*, published in 1968. The findings of the *Here Today* survey were adopted by the San Francisco Board of Supervisors in 1970, and the survey is considered an official local historical register under CEQA. Additionally, the Final EIR stated that the Cannery is eligible for listing in the CRHR under Criteria 1 (Events) and 3 (Architecture). Due to its inclusion in *Here Today* and its CRHR eligibility, the Cannery qualifies as a historical resource under CEQA. Additionally, in 2011 the Planning Department completed an HRER for 2801 Leavenworth Street, which identified a period of significance, 1907-1967, that encompasses Esherick's rehabilitation design. The HRER also lists the character-defining features of the property, some of which are located at the interior. Interior character-defining features include interior stairs illuminated by skylights, as well as interior elements referred to as the Hearst Estate interiors.

The Final EIR reported that the Planning Department completed an HRER for the original project, which determined that the exterior signage would adhere to the Secretary's Standards and thus would have a less than significant effect on 2801 Leavenworth Street for the purposes of CEQA review.

It is not anticipated that the revised project would result in changes to the building's exterior or interior character-defining features. The first level totals 39,150 square feet, comprised of approximately 22,669 square feet of restaurants, 6,880 square feet of retail space, and 9,300 square feet of vacant space. The proposal to activate the ground floor relates to the remaining 9,300 square feet of vacant space and does not require any physical changes to this vacant space. As stated in the Final EIR, future activities related to the implementation of the project that involve alterations to CEQA historical resources would undergo project-specific environmental review, as administered by the planning department. Once the project scope at 2801 Leavenworth Street is further developed to the level at which it can be analyzed for adherence to the Standards, and prior to the issuance of building permits, the revised project would be subject to the planning department's standard CEQA review procedures for historical resources. For the purposes of the present analysis, the revised project to modify the change of use application does not involve physical changes to the building's character-defining features, and thus the revised project scope at 2801 Leavenworth Street would not change the conclusion reached in the Final EIR that the project would not cause a significant impact related to historical resources. No new mitigation is required.

Archaeological Resources, Paleontological Resources, and Human Remains

As the revised project would not introduce ground disturbing activities at 2801 Leavenworth Street that were not analyzed in the Final EIR, the revised project scope at 2801 Leavenworth Street would not change the conclusion reached in the Final EIR that the project would not cause a significant impact related to archaeological resources, paleontological resources, and human remains. No new mitigation is required.

2225 Jerrold Avenue

2225 Jerrold Avenue was one of the project sites identified in the Final EIR that received a project-level analysis. The original project analyzed AAU's proposed use as AAU office space, storage area for AAU bus operations, mechanical/janitorial functions, and other miscellaneous storage for AAU purposes, along with approximately 22,683 square feet for SFFD storage use. In addition, the original project analyzed the inclusion of an approximately 17,533 square-foot AAU basketball court and weight room for recreational purposes. Under the revised project, AAU will revise its change of use application to replace the initially

proposed AAU recreational facilities with an approximately 15,084 square foot community facility that is open to the public and includes a multi-purpose recreation room and indoor and outdoor community facility lounge spaces. No ground disturbing activities would be required.

Historical Resources

2225 Jerrold Avenue is in the Bayview Hunters Point neighborhood in a heavy industrial area. The 125,581 square-foot lot contains a warehouse and parking facilities in the front and rear of the warehouse. The area immediately surrounding the project site is visually defined by light industrial, one to two-story warehouses and open storage yards. The topography of the area is flat. The project site is not a historical resource. The project does not propose any substantial exterior changes and would comply with Planning Code regulations to ensure that the revised project would not negatively change or disrupt the visual character of the site or vicinity. Implementation of the revised project would not affect a historic resource. Thus, the revised project at 2225 Jerrold Avenue would not change the conclusions reached in the Final EIR that the project would not cause a significant impact related to historical resources. No new mitigation is required.

Archaeological Resources, Paleontological Resources, and Human Remains

As the revised project would not introduce ground disturbing activities at 2225 Jerrold Avenue that were not analyzed in the Final EIR, the revised project scope at 2225 Jerrold Avenue would not change the conclusion reached in the Final EIR that the project would not cause a significant impact related to archaeological resources, paleontological resources, and human remains. No new mitigation is required.

Preservation Entitlements

As discussed above under Additional Term Sheet Requirements, eight of the 34 sites to be approved by the Master CU are designated in Article 11 of the Planning Code, three of the 34 sites are designated in Article 10 of the Planning Code, and one site is designated within both Article 10 and 11. As such, these sites have been determined to require Historic Preservation Commission approval of permits to alter and/or certificates of appropriateness. Preservation entitlement for these properties would be approved under a Master Certificate of Appropriateness (COA) or Master Permit to Alter (PTA) and would require the acquisition of either Administrative or full COAs or Major and Minor PTAs, as appropriate, in general accordance with Article 10 and Article 11 of the Planning Code.

The properties that require Administrative or full COAs are summarized below:

Requires an Administrative COA:

- 491 Post Street

Requires a COA:

- 58 Federal Street
- 601-625 Polk Street
- 2151 Van Ness Avenue

The properties that require Major and Minor PTAs are summarized below.

Requires a Minor PTA:

- 79 New Montgomery Street
- 680 Sutter Street

Requires a Major PTA

- 180 New Montgomery Street
- 620 Sutter Street
- 625 Sutter Street
- 655 Sutter Street
- 540 Powell Street
- 410 Bush Street

Overall, the revised projects would require the above preservation entitlements and therefore would not impact the integrity or character defining features of Article 10 or 11 buildings such that the historical significance of the respective properties could no longer be conveyed.

Conclusion

The revised project would not change any of the original project EIR's findings with respect to cultural and paleontological resources. There is no new information of substantial importance, such as new regulations, a change of circumstances (e.g., physical changes to the environment as compared to 2016), or changes to the project that would give rise to new significant environmental effects or a substantial increase in the severity of previously identified effects. This analysis does not result in any different conclusions than those reached in the original project EIR related to aesthetics, either on a project-related or cumulative basis.

4.5 Transportation and Circulation

The Final EIR concluded that, with mitigation, the original project would not result in a substantial adverse impact at any of the study or project site intersections during peak hours, or cause major traffic hazards;[21] would neither result in a substantial increase in local or regional transit demand that could not be accommodated by local or regional transit capacity, nor affect transit operating conditions such that adverse impacts on local or regional transit service could occur; and would not result in substantial overcrowding on public sidewalks or otherwise interfere with pedestrian accessibility, or create potentially hazardous conditions for pedestrians, resulting in less-than-significant impacts. It was also determined that the original project would not result in potentially hazardous conditions for bicyclists or otherwise substantially interfere with bicycle accessibility within the study areas or adjacent to the project sites; would not substantially increase loading demand; would not substantially increase parking demand nor would it cause unsafe or delayed conditions for other transportation activities; would not result in inadequate emergency access; and would not result in construction-related transportation impacts, also resulting in less-than-significant impacts.

The Final EIR concluded that the original project could result in a substantial increase in shuttle demand within the study areas and at the project site that could not be accommodated by planned shuttle capacity so as to avoid an impact on the city's transit or transportation system during the peak hour; however, this

[21] Automobile delay (as measured by level of service) was analyzed in the Final EIR under impacts TR-1.1, 1.2, 1.3 and C-TR-1.1, 1.2 and 1.3. On March 3, 2016, the San Francisco Planning Commission adopted Resolution 19579 to use the vehicle miles travelled metric instead of automobile delay to evaluate the transportation impacts of projects.

impact was determined to be less than significant with implementation of Mitigation Measure M-TR-3.1, which requires AAU to develop, implement, and provide to the city a shuttle management plan to address meeting the peak hour shuttle demand needs associated with its then-projected growth. With implementation of Mitigation Measure M-TR-3.1, the Final EIR determined that operation of AAU's shuttle service would not cause substantial conflicts with traffic, public transit, pedestrian, bicycles, or commercial loading, resulting in a less than significant impact with respect to these travel modes.

In regards to cumulative transportation and circulation impacts, the Final EIR also determined that growth in the 12 study areas and the six project sites, in combination with past, present, and reasonably foreseeable future projects in the vicinity of the study areas, could result in a substantial increase in local transit demand that could not be accommodated by adjacent Muni transit capacity on the Kearny/Stockton and Geary corridors under 2035 cumulative plus project conditions. This impact was found to be significant and unavoidable even with implementation of Mitigation Measure C-M-TR-2.1a, which requires AAU to make a fair share contribution to mitigate the cumulative transit demand impact related to AAU growth in transit ridership on the Kearny/Stockton corridor of the Northeast screenline and on the Geary corridor of the Northwest screenline to the municipal transit agency. The revised project would not change any of these findings, as further discussed below.

The Final EIR also includes the improvement measures summarized below that are intended to further reduce the less than significant impacts associated with single-occupancy vehicles, shuttle operation:

- Improvement Measure I-TR-1 requires AAU to implement a Transportation Demand Management (TDM) Program that seeks to minimize the number of single-occupancy vehicle trips generated by the original project for the lifetime of the project. The TDM Program targets a reduction in single-occupancy vehicle trips by encouraging persons to select other modes of transportation, including walking, bicycling, transit, car-share, carpooling, and/or other modes.

- Improvement Measure I-TR-2 requires AAU to develop and monitor a shuttle bus operation program or group of policies, such as the AAU Shuttle Bus Policy, to ensure shuttle activities do not on a recurring basis substantially impede or interfere with traffic, adjacent land use, transit, pedestrians, commercial or passenger loading, and bicycles on the public right-of-way.

- Improvement Measure I-TR-3 would improve pedestrian conditions at and around the 2225 Jerrold Avenue recreation facility by requiring AAU to create a clear pedestrian walkway between the proposed AAU shuttle stop and adjacent parking lot to the building entrance, in addition to making other changes to at this project site. This improvement measure has been incorporated into the plans submitted by AAU as part of its Master CU application

- Improvement Measure I-TR-4 would improve less-than-significant impacts related to bicycle parking and conditions for bicyclists by requiring AAU to add on- or off-street (or some combination thereof) bicycle parking facilities at the six project and future project sites. This improvement measure has been incorporated into the plans submitted by AAU as part of its Master CU application

- Improvement Measure I-TR-5 would improve less-than-significant impacts related to commercial loading by requiring AAU to monitor and efficiently manage their commercial loading activities

over time and as needed, adjusting times of deliveries or applying for additional on-street commercial loading spaces from the San Francisco Municipal Transit Agency.

- Improvement Measure I-TR-6 would further reduce less-than-significant construction-related transportation impacts by limiting truck movements to the hours between 9:00 a.m. and 3:30 p.m. (or other times, if approved by the municipal transit agency).

- Improvement Measure I-TR-7 would further reduce less-than-significant construction-related impacts to transportation by requiring AAU to develop construction management plans that improve carpool and transit access for construction workers (thereby reducing parking demand) and providing project construction updates to nearby businesses and neighborhoods regarding project construction schedules and contact information for specific construction concerns.

These improvement measures and all mitigation measures are included in the proposed Term Sheet as conditions of approval and would apply to all revised project circumstances as applicable.

The revised project would withdraw from nine existing AAU properties: 700 Montgomery Street, 1055 Pine Street, 1069 Pine Street, 2295 Taylor Street, 2340 Stockton Street, 460 Townsend Street, 150 Hayes Street, 121 Wisconsin Street, and 168 Bluxome Street. Since these properties would be vacated, there would not be additional project person trips generated from these projects as a result of implementation of the revised project. The revised project includes three new AAU sites (1142 Van Ness Avenue, 1946 Van Ness Avenue, and 2550 Van Ness Avenue) and changes of use at two existing AAU properties (2801 Leavenworth Street and 2225 Jerrold Avenue). Travel demand for these five properties was calculated by using the trip generation rates developed for each type of AAU use. Table 4 below presents the number of person trips for each project site under the existing condition, the existing plus project condition, and a net change between the two conditions. The revised project at these five sites would increase the total person trips by 430 trips during the PM peak hour.

Table 4 Revised Project Person Trips during PM Peak Hour

	Daily			*PM Peak Hour*		
Project Site	***Existing***	***Revised Project***	***Net Change***	***Existing***	***Revised Project***	***Net Change***
1. 1142 Van Ness Avenue	N/A	2,815	N/A	-	239	+239
2. 1946 Van Ness Avenue	N/A	1,386	N/A	-	118	+118
3. 2550 Van Ness Avenue	N/A	921	N/A	34	159	+125
4. 2801 Leavenworth Street	7,172	7,172	0	610	610	0
5. 2225 Jerrold Avenue	999	657	-342	105	53	-52
Total	**8,171**	**12,951**	**4,780**	**749**	**1,179**	**430**

Source: CHS Consulting 2018.

Table 5 below presents the number of vehicle trips, transit person-trips, and bike person-trips for 1142, 1946, and 2550 Van Ness Avenue, 2801 Leavenworth Street, and 2225 Jerrold Avenue under the existing condition, the existing plus project condition (i.e. revised project), and the net change between the two conditions. The revised project at these five sites would result in an increase of approximately 10 vehicle trips, 22 shuttle passenger trips, 10 bike trips, and 73 transit trips, and a decrease of approximately 14 carpool trips.

Table 5 Revised Project PM Peak Hour Trips by Mode

Project Site	Person Trips							Vehicle Trips
	Drive Alone	Carpool	Transit	Shuttle	Bike	Walk	Total	
Existing Condition								
1. 2225 Jerrold Avenue	15	5	0	85	0	0	105	17
2. 2801 Leavenworth Street	86	29	309	82	17	87	610	99
3. 1142 Van Ness Avenue	-	-	-	-	-	-	-	-
4. 1946 Van Ness Avenue	-	-	-	-	-	-	-	-
5. 2550 Van Ness Avenue	-	34	-	-	-	-	34	17
Total	**101**	**68**	**309**	**167**	**17**	**87**	**749**	**133**
Revised Project								
1. 2225 Jerrold Avenue	8	20	9	0	1	15	53	17
2. 2801 Leavenworth Street	52	18	187	49	10	53	369	60
3. 1142 Van Ness Avenue	34	11	121	32	7	34	239	39
4. 1946 Van Ness Avenue	17	6	60	16	3	17	118	19
5. 2550 Van Ness Avenue	-	-	8	91	6	54	159	-
Total	**111**	**55**	**385**	**188**	**27**	**173**	**938**	**135**
Net Change								
1. 2225 Jerrold Avenue	(7)	15	9	(85)	1	15	(52)	0
2. 2801 Leavenworth Street	(34)	(12)	(122)	(32)	(7)	(34)	(241)	(39)
3. 1142 Van Ness Avenue	34	11	121	32	7	34	239	39
4. 1946 Van Ness Avenue	17	6	60	16	3	17	118	19
5. 2550 Van Ness Avenue	-	(34)	8	91	6	54	125	(17)
Total	**10**	**(14)**	**73**	**22**	**10**	**86**	**189**	**2**

Source: CHS Consulting 2018.
Note: A number in parenthesis means the net balance is negative.

1055 Pine Street, 1069 Pine Street, 700 Montgomery Street, 2295 Taylor Street, 2340 Stockton Street, 168 Bluxome Street, 150 Hayes Street, 460 Townsend Street, and 121 Wisconsin Street

The Final EIR analyzed AAU's proposed conversion and occupation of 700 Montgomery Street, 2295 Taylor Street, and 2340 Stockton Street for AAU institutional use. However, as part of the revised project, AAU would not occupy any portion of these sites. In addition, AAU will no longer occupy 1055 Pine Street, 1069 Pine Street, 168 Bluxome Street, 150 Hayes Street, 460 Townsend Street or 121 Wisconsin Street. Future use of these sites is unknown at this time. As AAU would not occupy any portion of the project sites, vehicular, transit, shuttle, pedestrian, bicycle, and truck trips to or from these project sites would be reduced (see Tables 15 and 16 in Appendix B).[22] Therefore, there would be no impacts related to VMT, transit, shuttle, pedestrians, bicycles, loading, traffic hazards, emergency vehicle access, construction, and parking.

[22] CHS Consulting. 2018. Transportation Memo. February, 2019.

Transportation impacts will be analyzed through the entitlement and environmental review process once future uses for these project sites are identified. No mitigation measures are necessary. There would be no new significant impacts related to transportation at any of the project sites. Therefore, the revised project would not change the conclusions reached in the Final EIR regarding transportation and circulation, and no new mitigation is required.

1946 Van Ness Avenue (the Bakery)

Vehicle Miles Traveled

A project would have a significant effect on the environment if it would cause substantial additional Vehicle Miles Traveled (VMT). The State Office of Planning and Research's Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA ("proposed transportation impact guidelines") recommends screening criteria to identify types, characteristics, or locations of projects that would not result in significant impacts on VMT. If a project meets the screening criteria, then it is presumed that VMT impacts would be less than significant for the project, and a detailed VMT analysis is not required.

As noted above, AAU proposes to convert 1946 Van Ness Avenue to a post-secondary educational institutional use under the revised project. The 1946 Van Ness Avenue site is located in TAZ 343. Regional average daily work-related VMT is 16.2 per capita for office development. Table 6 includes the TAZ in which the project site is located, 343.

Table 6 Daily Vehicle Miles Traveled (Existing Condition)

	Bay Area		
Land Use	*Regional Average*	*Regional Average Minus 15%*	*TAZ 343*
Office	16.2	13.8	8.0

Source: CHS Consulting 2018.
VMT = vehicle miles travelled; TAZ = transportation analysis zone.

As shown in Table 6, existing average daily VMT per capita for residential uses in TAZ 343 is 8.0 miles. This is approximately 51 percent below the existing regional average daily VMT per capita of 16.2 miles. Given that the project site is located in an area where existing VMT is more than 15 percent below the existing regional average, the revised project would not result in substantial additional VMT and impacts would be less than significant. No mitigation measures are necessary. There would be no new significant impacts related to VMT at 1946 Van Ness Avenue. The revised project would not change the conclusions reached in the Final EIR regarding VMT, and no new mitigation is required.

Transit

The revised project would generate 60 additional transit trips (approximately 22 in and 38 out) during the PM peak hour at 1946 Van Ness Avenue. These trips would be dispersed throughout the transit network in the project vicinity using nearby Muni bus lines to reach their destinations or to access regional transit providers such as BART, Caltrain, SamTrans, AC Transit, and Golden Gate Transit, as needed. Nearby Muni bus routes 10-Townsend, 12-Folsom/Pacific, 19-Polk, 27-Bryant, 47-Van Ness, and 49-Van Ness-Mission currently operate at 71 percent, 57 percent, 66 percent, 46 percent, 58 percent, and 47 percent of their capacity, respectively, during the PM peak hour. The 60 PM peak hour transit trips are not anticipated to cause a substantial increase in transit demand that could not be accommodated by adjacent transit

capacity or exceed the SFMTA's performance standard of 85 percent capacity utilization during the PM peak hour.

The revised project at 1946 Van Ness would generate 19 additional vehicle trips to adjacent streets during the PM peak hour. Since the project site does not provide any off-street parking spaces, it is reasonable to assume that these vehicle trips would be spread among nearby streets. Based on the level and likely distribution of the additional vehicle traffic, the revised project would not add vehicle traffic to the degree that it would cause a substantial increase in transit delays or operating costs. The revised project would not cause a substantial conflict with the operation of transit vehicles on Van Ness Avenue. Therefore, transit impacts related to the proposed change of use at 1946 Van Ness Avenue would be less than significant. No mitigation measures are necessary. The revised project would not change the conclusions reached in the Final EIR regarding transit, and no new mitigation is required.

Shuttle

The revised project at 1946 Van Ness Avenue would generate approximately 16 shuttle riders during the PM peak hour. AAU would utilize the existing shuttle service on Van Ness Avenue (Route M) to serve this demand. In the spring semester of 2017, Route M operated every 20 minutes and traveled along portions of Polk Street, Van Ness Avenue, Laguna Street, Lombard Street, Broadway, Sacramento Street, Bush Street, Sutter Street, and Post Street, connecting students on Lombard Street, Van Ness Avenue, and Octavia Street to and from the AAU facilities located along Sutter Street. A new shuttle stop will also be added at 1604 Broadway in lieu of 2209 Van Ness Avenue.

In the spring semester of 2010, when capacity utilization data was last collected, this route operated at 44 percent of the total seated capacity (i.e., 65 seats) at the maximum load point during the PM peak hour. The shuttle frequency of Route M has since increased from a 50-minute headway to a 20-minute headway, increasing its peak hour capacity to an estimated 162 seats. Based on the increased capacity in 2017, the estimated shuttle demand of 16 shuttle riders would be accommodated with the existing shuttle route M.

AAU would not add any new shuttle stop for this project site, and instead would utilize a nearby shuttle stop in front of 1849 Van Ness Avenue (located approximately 300 feet south of the project site across Van Ness Avenue) to serve the estimated shuttle demand at this site. A new shuttle service stop would also be added at 1604 Broadway. Therefore, shuttle impacts would be less than significant. No mitigation measures are necessary. There would be no new significant impacts related to shuttle service at 1946 Van Ness Avenue. The revised project would reduce the impact identified in the Final EIR regarding shuttle service, and no new mitigation is required.

Pedestrians

Pedestrian trips generated by the revised project would include walk trips to and from transit stops, shuttle stops as well as nearby businesses and commercial uses. Overall, the revised project would add up to 92 pedestrian trips during the PM peak hour including 60 transit-access trips, 15 shuttle-access trips, and 17 walk trips. These additional pedestrian trips would be distributed onto surrounding sidewalks and are not anticipated to cause a substantial overcrowding on public sidewalks.

In the vicinity of the project site, Van Ness Avenue and Polk Street are High Injury corridors in the city's Vision Zero network. The 19 additional vehicle trips generated by the revised project would be distributed onto multiple streets, and the level of traffic added onto these streets would not exacerbate an existing

hazard for pedestrians. The revised project would not include any hazardous design features or result in unusual pedestrian conflict points.

Students traveling to the nearest Muni bus stop, as well as the shuttle stop at 1849 Van Ness Avenue, would likely cross Van Ness Avenue and travel along the existing sidewalks on Van Ness Avenue. Adjacent to the project site, the intersection of Van Ness Avenue and Post Street is controlled by traffic signals that include pedestrian crossing signal heads and have crosswalk markings with Americans with Disabilities Act-compliant curbed ramps at all four corners of the intersections. The revised project would not create barriers that could adversely affect pedestrian accessibility to the project site or adjoining areas. Therefore, pedestrian impacts would be less than significant. No mitigation measures are necessary. There would be no new significant impacts related to pedestrians at 1946 Van Ness Avenue. The revised project would not change the conclusions reached in the Final EIR regarding pedestrians, and no new mitigation is required.

Bicycles

The revised project would generate three additional bicycle trips and 19 additional vehicle trips during the PM peak hour at 1946 Van Ness Avenue. Although the revised project would result in an increase in both vehicle and bicycle trips in the vicinity of the project site, this increase would not be substantial enough to cause potential conflicts between bicycles and vehicles. This site has two off-street loading docks with a door fronting the south side of Jefferson Street. Vehicle access to these loading docks is not located on a bicycle route and would not create new collision risks through inadequate sight distance or substantial conflicts with bicyclists.

The revised project would be required to provide one class I and two class II bicycle parking spaces per San Francisco Planning Code section 155.2. While the number of proposed bicycle parking spaces is unknown at this time, the class I bicycle parking spaces would be located near the site's Van Ness Avenue entrance and the class II spaces would be on Jackson Street. The revised project would not include any design elements that could adversely affect bicycle accessibility to the project site or adjoining areas. Therefore, bicycle impacts would be less than significant. No mitigation measures are necessary. There would be no new significant impacts related to bicycles at 1946 Van Ness Avenue. The revised project would not change the conclusions reached in the Final EIR regarding bicycles, and no new mitigation is required.

Loading

The revised project would generate a total of three daily truck trips, which corresponds to a demand for up to one space during the average loading hour or the peak loading hour (see Table 16 Appendix B). The project site has two off-street loading docks with a door fronting the south side of Jefferson Street. In addition, there is one on-street freight loading space located on the east side of Van Ness Avenue, adjacent to the project site. These spaces can be potentially used to accommodate the project loading demand. The revised project is not required to provide any off-street freight loading spaces per San Francisco Planning Code section 152.1. Therefore, the revised project would be in compliance with the planning code and loading impacts would be less than significant. No mitigation measures are necessary. There would be no new significant impacts related to bicycles at 1946 Van Ness Avenue. The revised project would not change the conclusions reached in the Final EIR regarding bicycles, and no new mitigation is required.

Traffic Hazards

The project site would have two vehicle ingress/egress driveways on Jackson Street for access to the loading docks. Jackson Street carries approximately 320 vehicles during the PM peak hour. Vehicles attempting to enter the loading docks (three daily truck trips) would be required to stop for a gap in traffic along Jackson Street prior to entering the loading docks, if approaching from the westbound direction. Because the level of the existing traffic on Jackson Street is low, no extended queues would be expected to occur and potential conflicts between the truck trips and the existing traffic on Jackson Street would be low. Trucks exiting the loading docks would yield to any vehicles traveling along the Jackson Street, and would not cause adverse traffic impacts related to safety. The revised project would not include any design elements that would create new collision risks through inadequate sight distance or substantial conflicts to vehicles. Therefore, traffic impacts would be less than significant. No mitigation measures are necessary. There would be no new significant impacts related to traffic hazards at 1946 Van Ness Avenue. The revised project would not change the conclusions reached in the Final EIR regarding traffic hazards, and no new mitigation is required.

Emergency Vehicle Access

The street network serving the project site currently accommodates the movements of emergency vehicles that travel to the project site. In the event of an emergency, vehicles would access the project site from Van Ness Avenue or Jackson Street immediately adjacent to the site in the same way as under the existing condition. Furthermore, although the revised project would generate additional traffic in the area, such an increase in vehicles would be a 1 percent increase (i.e., 19 vehicle trips over 1,830 existing vehicle trips on Van Ness Avenue during the PM peak hour) over the existing traffic volumes along Van Ness Avenue and would not impede or hinder the movement of emergency vehicles in the project area, for example from the nearest fire stations (i.e., Fire Department Fire Station No. 41 at 1325 Leavenworth Street). Therefore, emergency vehicle access impacts would be less than significant. No mitigation measures are necessary. There would be no new significant impacts related to emergency vehicle access at 1946 Van Ness Avenue. The revised project would not change the conclusions reached in the Final EIR regarding emergency vehicle access, and no new mitigation is required.

Construction

Detailed plans for renovation activities at 1946 Van Ness Avenue are not available at this time, but because the revised project would involve the reuse of an existing building, the majority of improvements would be internal to the building, with minimal construction-related activities to the exterior of the building or other portions of the project site. Because the revised project would not involve demolition or grading, it is unlikely that the project would generate a substantial amount of trips associated with haul trucks, which are commonly used for import of fill materials/equipment and export of spoils.

Construction contractor(s) would be required to coordinate with Transportation Advisory Staff Committee (TASC) and other agencies (as appropriate) and prepare and implement a Construction Management Plan, which would address issues of circulation (traffic, pedestrians, and bicycle), safety, parking, and other project construction in the area. Therefore, construction impacts would be less than significant. No mitigation measures are necessary. There would be no new significant impacts related to construction at 1946 Van Ness Avenue. The revised project would not change the conclusions reached in the Final EIR regarding construction, and no new mitigation is required.

Parking

The revised project would not include any off-street parking spaces, nor is it required to provide any off-street parking space per San Francisco Planning Code section 151.1. Therefore, the revised project would be in compliance with the planning code. No mitigation measures are necessary. There would be no new significant impacts related to parking at 1946 Van Ness Avenue. The revised project would not change the conclusions reached in the Final EIR regarding parking, and no new mitigation is required.

1142 Van Ness Avenue (the Concordia Club)

Vehicle Miles Traveled

The 1142 Van Ness Avenue site is located in TAZ 699. Regional average daily work-related VMT is 16.2 per capita for office development. As shown in Table 7, existing average daily VMT per capita for residential uses in TAZ 699 is 7.2 miles.

Table 7 Daily Vehicle Miles Traveled (Existing Condition)

Land Use	*Bay Area VMT (miles)*		*TAZ 699 VMT (miles)*
	Regional Average	*Regional Average Minus 15%*	
Office	16.2	13.8	7.2

SOURCE: CHS Consulting 2018.
VMT = vehicle miles travelled; TAZ = transportation analysis zone.

This is approximately 56 percent below the existing regional average daily VMT per capita of 16.2 miles. Given that the project site is located in an area where existing VMT is more than 15 percent below the existing regional average, the revised project would not result in substantial additional VMT and impacts would be less than significant. No mitigation measures are necessary. There would be no new significant impacts related to VMT at 1142 Van Ness Avenue. The revised project would not change the conclusions reached in the Final EIR regarding VMT, and no new mitigation is required.

Transit

The revised project would generate 121 additional transit trips (approximately 45 in and 76 out) during the PM peak hour at 1142 Van Ness Avenue. Nearby Muni bus routes include 2-Clement, 3-Jackson, 19-Polk, 38-Geary, 38R-Geary Rapid, 47-Van Ness, and 49-Van Ness-Mission. Each of these lines currently operates below the SFMTA's performance standard of 85 percent capacity utilization during the PM peak hour, except for the 38R-Geary Rapid which operates at 90 percent of its capacity. While the revised project would generate a total of 121 additional transit trips, only 45 of these trips would occur in the inbound direction and contribute to the capacity utilization in the peak direction during the PM peak hour. These 45 transit trips would be dispersed throughout multiple Muni bus lines in the vicinity of the project site. Therefore, the increased transit demand would not constitute a substantial contribution to the existing transit service in the area.

The revised project would generate 39 additional vehicle trips to adjacent streets during the PM peak hour. Since the project site does not provide any off-street parking space, it is reasonable to assume that these vehicle trips would be distributed onto nearby streets. Based on the level and likely distribution of the additional vehicle traffic, the revised project would not cause substantial increase in transit delays or operating costs. Therefore, transit impacts would be less than significant. No mitigation measures are

necessary. There would be no new significant impacts related to transit at 1142 Van Ness Avenue. The revised project would not change the conclusions reached in the Final EIR regarding transit, and no new mitigation is required.

Shuttle

The revised project at 1142 Van Ness Avenue would generate approximately 32 shuttle riders during the PM peak hour. AAU would utilize the existing shuttle service on Van Ness Avenue (route M) to serve the increased demand. In the spring semester of 2017, Route M operated every 20 minutes and traveled along portions of Polk Street, Van Ness Avenue, Laguna Street, Lombard Street, Broadway, Sacramento Street, Bush Street, Sutter Street, and Post Street, connecting students on Lombard Street, Van Ness Avenue, and Octavia Street to and from the AAU facilities located along Sutter Street. As part of the revised project, a new shuttle stop would be added at 1604 Broadway in lieu of 2209 Van Ness Avenue.

In the spring semester of 2010, when capacity utilization data was collected, this route operated at 44 percent of the total seated capacity (i.e., 65 seats) at the maximum load point during the PM peak hour. The shuttle frequency of Route M has since increased from 50-minute headway to 20-minute headway, increasing its peak hour capacity to an estimated 162 seats. Based on the increased capacity in 2017, the estimated shuttle demand of 32 shuttle riders would be accommodated with the existing shuttle route M.

AAU would add a new shuttle stop for this project site using the existing white passenger loading zone in front of the project site on Van Ness Avenue. New shuttle service stops would also be added at 1604 Broadway. Shuttle buses are expected to fully pull into the designated shuttle bus zone without substantial conflicts with Muni transit vehicles. Van Ness Avenue is not a designated bicycle route. Therefore, the new AAU shuttle stop would not directly conflict with bicycle traffic. Therefore, shuttle impacts would be less than significant. No mitigation measures are necessary. There would be no new significant impacts related to shuttle service at 1142 Van Ness Avenue. The revised project would reduce the impact identified in the Final EIR regarding shuttle service, and no new mitigation is required.

Pedestrians

Pedestrian trips generated by the revised project at 1142 Van Ness Avenue would include walk trips to and from transit stops, as well as nearby businesses and commercial uses. Overall, the revised project would add up to 155 pedestrian trips during the PM peak hour including 121 transit-access trips and 34 walk trips. These additional pedestrian trips would be spread onto surrounding sidewalks and would not be anticipated to cause substantial overcrowding on public sidewalks.

Near the project site, Van Ness Avenue, Polk Street, Post Street, Geary Street, and O'Farrell Street are designated as High Injury corridors in the city's Vision Zero network. The 39 additional vehicle trips generated by the revised project would be distributed onto multiple streets, and the level of traffic added onto these streets would not exacerbate any existing hazards for pedestrians. The revised project would not include any hazardous design features or result in unusual pedestrian conflict points.

Students traveling to the nearest Muni bus stop would travel along the existing sidewalks on Van Ness Avenue. Adjacent to the project site, the intersection of Van Ness Avenue and Post Street is controlled by traffic signals that include pedestrian crossing signal heads and have crosswalk markings with Americans with Disabilities Act-compliant curb ramps at all four corners of the intersections. The revised project would not create barriers that could adversely affect pedestrian accessibility to the project site or adjoining

areas. Therefore, pedestrian impacts would be less than significant. No mitigation measures are necessary. There would be no new significant impacts related to pedestrians at 1142 Van Ness Avenue. The revised project would not change the conclusions reached in the Final EIR regarding pedestrians, and no new mitigation is required.

Bicycles

The revised project at 1142 Van Ness Avenue would generate seven additional bicycle trips and 39 additional vehicle trips during the PM peak hour. Although the revised project would result in an increase in both vehicle and bicycle trips in the vicinity of the project site, this increase would not be substantial enough to cause potential conflicts between bicycles and vehicles. The revised project would not have any vehicle ingress/egress driveway and would not cause new collision risks with bicyclists.

The revised project would be required to provide two class I and four class II bicycle parking spaces meeting or exceeding the San Francisco Planning Code section 155.2 requirement. Accordingly, the revised project at 1143 Van Ness Avenue includes two class I bicycle parking spaces and four class 2 bicycle parking spaces on the property's Van Ness Avenue frontage. The revised project would not include any design elements that could adversely affect bicycle accessibility to the project site or adjoining areas. Therefore, bicycle impacts would be less than significant. No mitigation measures are necessary. There would be no new significant impacts related to bicycles at 1142 Van Ness Avenue. The revised project would not change the conclusions reached in the Final EIR regarding bicycles, and no new mitigation is required.

Loading

The revised project at 1142 Van Ness Avenue would generate a total of five daily truck trips, which corresponds to a demand for up to one space during the average loading hour or the peak loading hour (see Table 16 in Appendix B). The project site does not have any off-street loading onsite. However, commercial deliveries to the site could temporarily utilize the existing 45-foot-long white passenger loading spaces in front of the project site or on-street parking spaces on Van Ness Avenue. The revised project is not required to provide any off-street freight loading spaces per San Francisco Planning Code section 152.1 and the revised project would therefore comply with the planning code. Therefore, loading impacts would be less than significant. No mitigation measures are necessary. There would be no new significant impacts related to loading at 1142 Van Ness Avenue. The revised project would not change the conclusions reached in the Final EIR regarding loading, and no new mitigation is required.

Traffic Hazards

The 1142 Van Ness Avenue project site would not have any vehicle ingress/egress driveway and would not cause major vehicle conflicts. The revised project would not include any design elements that would create new collision risks through inadequate sight distance or substantial conflicts with vehicles. Therefore, traffic impacts would be less than significant. No mitigation measures are necessary. There would be no new significant impacts related to traffic hazards at 1142 Van Ness Avenue. The revised project would not change the conclusions reached in the Final EIR regarding traffic hazards, and no new mitigation is required.

Emergency Vehicle Access

The street network serving the 1142 Van Ness Avenue project site currently accommodates the movements of emergency vehicles that travel to the project site. In the event of an emergency, vehicles would access the project site from Van Ness Avenue immediately adjacent to the site in the same way as under the existing condition. Furthermore, although the revised project would generate additional traffic in the area, such an increase in vehicles would be a less than 2 percent increase (i.e., 39 vehicle trips over the current 1,960 existing vehicle trips during the PM peak hour) over the existing traffic volumes along Van Ness Avenue and would not impede or hinder the movement of emergency vehicles in the project area, for example from the nearest fire stations (i.e., Fire Department Fire Station No. 3 at 1067 Post Street). Therefore, emergency vehicle access impacts would be less than significant. No mitigation measures are necessary. There would be no new significant impacts related to emergency vehicle access at 1142 Van Ness Avenue. The revised project would not change the conclusions reached in the Final EIR regarding emergency vehicle access, and no new mitigation is required.

Construction

Detailed plans for renovation activities for 1142 Van Ness Avenue are not available at this time, but because the revised project would involve the reuse of an existing building, the majority of construction activities would be internal to the building, with minimal construction-related activities to the exterior of the building or other portions of the project site. Because the revised project would not involve demolition or grading, it is unlikely that the project would generate substantial trips from haul trucks, which are commonly used for import of fill materials/equipment and export of spoils.

Construction contractor(s) would be required to coordinate with TASC and other agencies (as appropriate) and prepare a Construction Management Plan, which would address issues of circulation (traffic, pedestrians, and bicycle), safety, parking, and other project construction in the area. Therefore, construction impacts would be less than significant. No mitigation measures are necessary. There would be no new significant impacts related to construction at 1142 Van Ness Avenue. The revised project would not change the conclusions reached in the Final EIR regarding construction, and no new mitigation is required.

Parking

The revised project would not include any off-street parking spaces and it is not required to provide any off-street parking space per San Francisco Planning Code section 151.1. Therefore, the revised project would be in compliance with the planning code. No mitigation measures are necessary. There would be no new significant impacts related to parking at 1142 Van Ness Avenue. The revised project would not change the conclusions reached in the Final EIR regarding parking, and no new mitigation is required.

2550 Van Ness Avenue (the Da Vinci Hotel)

Vehicle Miles Traveled

The 2550 Van Ness Avenue site is located in TAZ 367. Regional average daily work-related VMT is 16.2 per capita for office development. As shown in Table 8, existing average daily VMT per capita for residential uses in TAZ 367 is 9.1 miles.

Table 8 Daily Vehicle Miles Traveled (Existing Condition)

Land Use	Bay Area VMT (miles)		TAZ 367 VMT (miles)
	Regional Average	Regional Average Minus 15%	
Office	16.2	13.8	9.1

SOURCE: CHS Consulting 2018
VMT = vehicle miles travelled; TAZ = transportation analysis zone.

This is approximately 44 percent below the existing regional average daily VMT per capita of 16.2 miles. Given that the project site is located in an area where existing VMT is more than 15 percent below the existing regional average, the revised project would not result in substantial additional VMT and impacts would be less than significant. No mitigation measures are necessary. There would be no new significant impacts related to VMT at 2550 Van Ness Avenue. The revised project would not change the conclusions reached in the Final EIR regarding VMT, and no new mitigation is required.

Transit

The revised project would generate eight additional transit trips (approximately four in and four out) during the PM peak hour at 2250 Van Ness Avenue. Nearby Muni bus routes include 19-Polk, 41-Union, 45-Union/Stockton, 47-Van Ness, and 49-Van Ness-Mission. Each of these lines currently operates below the SFMTA's performance standard of 85 percent capacity utilization during the PM peak hour, except for 41-Union which operates at 90 percent of its capacity. While the revised project would generate a total of eight additional transit trips, only four of these trips would occur in the inbound direction and contribute to the capacity utilization in the peak direction during the PM peak hour. These four transit trips would be dispersed throughout multiple Muni bus lines in the vicinity of the project site. Therefore, the increased transit demand would not be a substantial contribution to the existing transit service in the area.

The revised project would cause a reduction of 17 vehicle trips in adjacent streets during the PM peak hour with the change in use at this site. Therefore, the revised project would not cause a substantial increase in transit delays or operating costs. AAU would not add a new shuttle stop for this project site, and instead would utilize the existing shuttle service on Van Ness Avenue (Route M). A new shuttle service stop would be added at 1604 Broadway. Since there would be no new shuttle stop, the revised project would not cause a substantial conflict with the operation of transit vehicles on Van Ness Avenue. Therefore, transit impacts would be less than significant. No mitigation measures are necessary. There would be no new significant impacts related to transit at 2550 Van Ness Avenue. The revised project would not change the conclusions reached in the Final EIR regarding transit, and no new mitigation is required.

Shuttle

The revised project would generate approximately 91 shuttle riders during the PM peak hour. AAU would utilize the existing shuttle service on Van Ness Avenue (Route M) to serve the demand. In the spring semester of 2017, Route M operated every 20 minutes and traveled along portions of Polk Street, Van Ness Avenue, Laguna Street, Lombard Street, Broadway, Sacramento Street, Bush Street, Sutter Street, and Post Street, connecting students on Lombard Street, Van Ness Avenue, and Octavia Street to and from the AAU facilities located along Sutter Street. As part of the revised project, a new shuttle stop will also be added at 1604 Broadway in lieu of 2209 Van Ness Avenue.

In the spring semester of 2010, when capacity utilization data was collected, this route operated at 44 percent of the total seated capacity (i.e., 65 seats) at the maximum load point during the PM peak hour. The

shuttle frequency of Route M has since increased from 50-minute headway to 20-minute headway, increasing its peak hour capacity to an estimated 162 seats. Based on the increased capacity in 2017, the estimated shuttle demand of 91 shuttle riders would be accommodated with the existing shuttle Route M.

As noted, a new shuttle stop would be added at 1604 Broadway in lieu of 2209 Van Ness Avenue to serve the estimated shuttle demand. Therefore, shuttle impacts would be less than significant. No mitigation measures are necessary. There would be no new significant impacts related to shuttle service at 2550 Van Ness Avenue. The revised project would reduce the impact identified in the Final EIR regarding shuttle service, and no new mitigation is required.

Pedestrians

Pedestrian trips generated by the revised project would include walk trips to and from transit stops, shuttle stops as well as nearby businesses and commercial uses. Overall, the revised project would add up to 153 pedestrian trips during the PM peak hour including eight transit-access trips, 91 shuttle-access trips, and 54 walk trips. These additional pedestrian trips would be spread onto surrounding sidewalks and would not be anticipated to cause a substantial overcrowding on public sidewalks.

In the vicinity of the project site, Van Ness Avenue and Polk Street are High Injury corridors in the city's Vision Zero network. The revised project would cause a net reduction in 16 vehicle trips and thereby reduce existing hazards for pedestrians. The revised project would not include any hazardous design features or result in unusual pedestrian conflict points.

Students traveling to the nearest Muni bus stop, as well as the shuttle stops at 2151 Van Ness Avenue or 1604 Broadway, would likely cross Van Ness Avenue and travel along the existing sidewalks on Van Ness Avenue. Adjacent to the project site, the intersection of Van Ness Avenue and Filbert Street is controlled by traffic signals and has crosswalk markings with Americans with Disabilities Act-compliant curbed ramps at all four corners of the intersections. The revised project would not create barriers that could adversely affect pedestrian accessibility to the project site or adjoining areas. Therefore, pedestrian impacts would be less than significant. No mitigation measures are necessary. There would be no new significant impacts related to pedestrians at 2550 Van Ness Avenue. The revised project would not change the conclusions reached in the Final EIR regarding pedestrians, and no new mitigation is required.

Bicycles

The revised project at 2550 Van Ness Avenue would generate six additional bicycle trips and 17 additional vehicle trips during the PM peak hour at 2550 Van Ness Avenue. Although the revised project would result in an increase in both vehicle and bicycle trips in the vicinity of the project site, this increase would not be substantial enough to cause potential conflicts between bicycles and vehicles. This site has two off-street loading docks with a door fronting the south side of Jefferson Street. Vehicle access to these loading docks is not located on a bicycle route and would not create new collision risks through inadequate sight distance or substantial conflicts to bicyclists.

The revised project would be required to provide 99 class I and 15 class II bicycle parking spaces per San Francisco Planning Code section 155.2. There are currently only four class I bicycle parking spaces provided on site near the loading area on Filbert Street. The revised project at 2550 Van Ness Avenue includes 99 class I bicycle parking spaces along the property's Filbert Street frontage and 16 class II bicycle parking spaces along the property's Van Ness Avenue frontage. The revised project would not include any design

elements that could adversely affect bicycle accessibility to the project site or adjoining areas. Therefore, bicycle impacts would be less than significant. There would be no new significant impacts related to bicycles at 2550 Van Ness Avenue. The revised project would not change the conclusions reached in the Final EIR regarding bicycles, and no new mitigation is required.

Loading

The revised project would generate a total of two daily truck trips, which corresponds to a demand for up to one space during the average loading hour or the peak loading hour. The project site does not include an off-street loading area. However, there is a 60-foot-long on-street freight loading (yellow curb) space on the east side of Van Ness Avenue adjacent to the project site. This loading area would help meet the project loading demand. The revised project is not required to provide any off-street freight loading spaces per San Francisco Planning Code section 152.1. Therefore, the revised project would be in compliance with the planning code and loading impacts would be less than significant. No mitigation measures are necessary. There would be no new significant impacts related to loading at 2550 Van Ness Avenue. The revised project would not change the conclusions reached in the Final EIR regarding loading, and no new mitigation is required.

Traffic Hazards

The project site would have three vehicle ingress/egress driveways on Filbert Street for access to the parking areas. Filbert Street carries approximately 250 vehicles during the PM peak hour. Vehicles attempting to enter the parking areas would be required to stop for a gap in traffic along Filbert Street prior to entering the loading areas, if approaching from the westbound direction. Because the level of the existing traffic on Filbert Street is low, no extended queues are expected to occur and potential conflicts between the truck trips and the existing traffic on Filbert Street would be low. Vehicles exiting the parking areas would yield to any vehicles traveling along the Filbert Street, and would not cause adverse traffic impacts related to safety. The revised project would not include any design elements that would create new collision risks through inadequate sight distance or substantial conflicts with vehicles. Therefore, traffic impacts would be less than significant. No mitigation measures are necessary. There would be no new significant impacts related to traffic hazards at 2550 Van Ness Avenue. The revised project would not change the conclusions reached in the Final EIR regarding traffic hazards, and no new mitigation is required.

Emergency Vehicle Access

The street network serving the project site currently accommodates the movements of emergency vehicles that travel to the project site. In the event of an emergency, vehicles would access the project site from Van Ness Avenue or Filbert Street immediately adjacent to the site in the same way as under the existing condition. Furthermore, the revised project would cause a net reduction in 17 vehicle trips and would not impair the movement of emergency vehicles in the project area, for example from the nearest fire stations (i.e., Fire Department Fire Station No. 41 at 1325 Leavenworth Street). Therefore, emergency vehicle access impacts would be less than significant. No mitigation measures are necessary. There would be no new significant impacts related to emergency vehicle access at 2550 Van Ness Avenue. The revised project would not change the conclusions reached in the Final EIR regarding emergency vehicle access, and no new mitigation is required.

Construction

Detailed plans for renovation activities at 2550 Van Ness Avenue are not available at this time, but because the revised project would involve the reuse of an existing building, any construction activities would be internal to the building, with minimal improvements to the exterior of the building or other portions of the project site. Because the revised project would not involve demolition or grading, it is unlikely that the project would generate a substantial amount of haul trucks, which are commonly used for import of fill materials/equipment and export of spoils.

Construction contractor(s) would be required to coordinate with TASC and other agencies (as appropriate) and prepare a Construction Management Plan, which would address issues of circulation (traffic, pedestrians, and bicycle), safety, and parking and other project construction in the area. Therefore, construction impacts would be less than significant. No mitigation measures are necessary. There would be no new significant impacts related to construction at 2550 Van Ness Avenue. The revised project would not change the conclusions reached in the Final EIR regarding construction, and no new mitigation is required.

Parking

The revised project would provide 43 off-street parking spaces for AAU faculty and staff use (approved by conditional use authorization), three parking spaces for the existing restaurant use, and one car share space for a total reduction of six spaces from the existing 53 spaces. Therefore, the revised project would be in compliance with the planning code. No mitigation measures are necessary. There would be no new significant impacts related to parking at 2550 Van Ness Avenue. The revised project would not change the conclusions reached in the Final EIR regarding parking, and no new mitigation is required.

2801 Leavenworth Street (the Cannery)

AAU currently uses a portion of the building at 2801 Leavenworth Street (80,908 square feet) for office, gallery, and multi-use/event space. Other tenants include a mix of office, retail, commercial, and restaurant uses. The Final EIR analyzed the conversion and occupation of the entire 133,675 square foot site by AAU for institutional use. However, as part of the revised project, AAU would modify its application to retain retail or other active uses on the ground floor that are physically accessible to members of the public during the normal retail hours of operation customary in the area. AAU may have galleries on the ground floor and limit other uses to the mezzanine, second and third floors of the building.

Since AAU would reduce its footprint at 2801 Leavenworth Street by modifying its application, compared to the Final EIR, AAU would reduce vehicular, transit, shuttle, pedestrian, bicycle, truck trips to or from this project site (see Tables 15 and 16 in Appendix B). Therefore, impacts related to VMT, transit, shuttle, pedestrians, bicycles, loading, traffic hazards, emergency vehicle access, construction, and parking would be reduced as compared to the previously proposed project. There would be no new significant impacts related to transportation at any of the project sites. Therefore, the revised project would not change the conclusions reached in the Final EIR regarding transportation and circulation, and no new mitigation is required.

2225 Jerrold Avenue

The Final EIR analyzed the 2225 Jerrod Avenue site for vehicle and commercial storage uses, office space, and AAU recreational uses that included a gym and basketball courts. Under the revised project, AAU would revise its change of use application to replace the initially proposed AAU recreational facilities with a community facility that is open to the public and includes a multi-purpose recreation room and indoor and outdoor community facility lounge spaces.

Compared to the Final EIR, the revised project would not result in increased vehicle trips, including shuttle trips, to and from the site. The proposed project would, however, increase other mode trips during the PM peak hour, including nine transit trips, one bike trip, and 15 pedestrian trips. These trips are considered low volume. The revised project would not include any hazardous design features or barriers that could adversely affect pedestrian and bicycle accessibility to the project site or surrounding area. The revised project would not result in new significant impacts related to VMT, transit, shuttle, pedestrians, bicycles, loading, traffic hazards, emergency vehicle access, construction and parking compared to the previously proposed project. The revised project would not change the conclusions reached in the Final EIR regarding transportation and circulation, and no new mitigation is required.

Conclusion

The revised project would not change any of the Final EIR's findings with respect to transportation and circulation impacts. There is no new information of substantial importance, such as new regulations, a change of circumstances (e.g., physical changes to the environment as compared to 2010), or changes to the project that would give rise to new significant environmental effects or a substantial increase in the severity of previously identified significant effects. Conclusions from this analysis remain the same as those reached in the Final EIR related to transportation and circulation, both on a project-related and cumulative basis. In addition, note that all transportation and circulation mitigation and improvement measures would continue to apply to the revised project as applicable. Thus Mitigation Measures M-TR-3.1 (Shuttle Demand, Service Monitoring, and Capacity Utilization) and C-M-TR-2.1a (AAU Fair Share Contribution to Cumulative Transit Impact) would ameliorate conditions related to shuttle demand and operation as they may affect the revised project. Similarly, less-than-significant impacts of the revised project related to single-occupancy vehicles, monitoring of shuttle activities, bicycle parking conditions, commercial loading activities, and construction activities would be further reduced by Improvement Measures I-TR-1, I-TR-2, I-TR-4, I-TR-5, I-TR-6, and TR-7, respectively.

4.6 Noise

The Final EIR's analysis of potential noise impacts associated with the original project included (1) noise generated by construction activities, (2) traffic and stationary source noise generated by future AAU operations, (3) consistency of potential future uses with San Francisco Land Use Compatibility Guidelines for Community Noise (Figure 4.7-8, City of San Francisco Land Use Compatibility Guidelines, p. 4.7-21), and (4) vibration. Potential contributions to cumulative noise impacts were evaluated in the context of the then-existing, proposed, and reasonably foreseeable future development expected in the vicinity of the original project, with the assumption that it would be limited to occupancy and change of use of existing buildings in already developed areas of the city. The Final EIR determined that the potential siting of noise-generating stationary equipment (such as pumps, fans, air-conditioning apparatus or refrigeration machines) at future study area locations could result in health effects associated with exposure to chronic

high levels of environmental noise and with exposure to short-term spikes in noise occurring during the typical hours of sleep. To reduce such a potential impact the Final EIR includes Mitigation Measure M-NO-2.1c, which requires AAU to prepare an analysis of noise that may occur with the installation of new mechanical equipment or ventilation units as part of a building change of use that would be expected to increase ambient noise levels by 5 dBA or more, either short-term, at nighttime, or as a 24-hour average, in the proposed project site vicinity.[23] Furthermore, all such mechanical equipment is subject to section 2909(a) and (b) of the Noise Ordinance, which limit mechanical equipment noise from residential and commercial properties at the property plane to no more than 5 and 8 dBA above the ambient noise level.

The Final EIR concluded that the original project would not expose people to temporary or permanent increases in noise levels substantially in excess of ambient levels, result in noise levels in excess of standards established in the San Francisco General Plan or Noise Ordinance, create excessive ground borne vibration, or result in any cumulative noise impacts in combination with past, present, and future projects. The revised project would not change any of these findings, as further discussed below.

The revised project includes the following activities related to noise and vibration:

- Construction activities involving minor, largely interior alterations at 1946 Van Ness Avenue, 1142 Van Ness Avenue, 2550 Van Ness Avenue, and 2801 Leavenworth Street;

- Minor changes in the volumes and distribution of traffic associated with the changes of use proposed by the revised project; and

As analyzed below, the potential temporary noise impacts associated with the revised project would be associated with construction activities, while the potential permanent noise impacts would be associated with operation of the buildings (primarily noise associated with stationary equipment and changes in traffic volumes and distribution).
As discussed previously, under the revised project AAU would vacate the six-story building at 1055 Pine Street and the one-story building at 1069 Pine Street. The 155 beds currently provided at 1055 Pine Street would be relocated to the Da Vinci Hotel at 2550 Van Ness Avenue (see discussion below). The 1069 Pine Street building contains a small gymnasium which would be relocated to an existing, similarly-sized gymnasium at 1142 Van Ness Avenue (the site of the former Concordia Club). Future uses at 1055 Pine Street and 1069 Pine Street are unknown at this time; however, changes of use and/or physical modifications at both buildings would be subject to all applicable San Francisco codes and, if required, appropriate California Environmental Quality Act (CEQA) review at the time such changes (if any) are proposed. No substantial noise-generating activities would occur with the vacation of these two properties. Therefore, the revised project would not change the conclusions reached in the Final EIR regarding noise, and no new mitigation is required.

[23] The Final EIR also included two mitigation measures (M-NO-2.1a and 2.1b) intended to address potential noise impacts to new residential uses that would be sited in noisy environments. However, the California Supreme Court has held that CEQA does not generally require an agency to consider the effects of existing environmental conditions on a proposed project's future users or residents except where a project or its residents may exacerbate existing environmental hazards (California Building Industry Association v. Bay Area Air Quality Management District, December 17, 2015, Case No. S213478. Available at: http://www.courts.ca.gov/opinions/documents/S213478.PDF).

1055 Pine Street, 1069 Pine Street, 700 Montgomery Street, 2295 Taylor Street, 2340 Stockton Street, 168 Bluxome Street, 150 Hayes Street, 460 Townsend Street and 121 Wisconsin Street

Under the revised project, AAU would vacate 1055 Pine Street, 1069 Pine Street, 700 Montgomery Street, 2295 Taylor Street, 2340 Stockton Street, 168 Bluxome Street, 150 Hayes Street, 460 Townsend Street and 121 Wisconsin Street. AAU would not make any interior or exterior modifications to these buildings and the pending change of use applications would be withdrawn, resulting in no additions or changes to any of the buildings. Any future modifications or changes of use at these sites would be subject to separate CEQA review.

Therefore, because no modifications at 1055 Pine Street, 1069 Pine Street, 700 Montgomery Street, 2295 Taylor Street, 2340 Stockton Street, 168 Bluxome Street, 150 Hayes Street, 460 Townsend Street and 121 Wisconsin Street would occur, the revised project at these properties would not add new or change the magnitude of existing noise or vibration sources, because no construction or renovation activities would occur, no new vehicle trips would be generated, and no other stationary sources of noise would be added to the sites. As determined in the transportation analysis conducted for the revised project, vacation of each of these sites would result in a net decrease in trips relative to the existing conditions. Consequently, the ambient noise environment under the existing conditions would be unchanged. There would be no impact, and no mitigation measures are necessary. There would be no new significant impacts related to noise at 1055 Pine Street, 1069 Pine Street, 700 Montgomery Street, 2295 Taylor Street, 2340 Stockton Street, 168 Bluxome Street, 150 Hayes Street, 460 Townsend Street and 121 Wisconsin Street. Therefore, the revised project would not change the conclusions reached in the Final EIR regarding noise, and no new mitigation is required.

1946 Van Ness Avenue (the Bakery)

Temporary Noise Impacts

The conversion for post-secondary educational institutional use at 1946 Van Ness Avenue would require minor modifications to the base building core and shell to bring the building into compliance with current life safety codes. This tenant improvement work would primarily occur both on the exterior and within the interior of the building; however, it would not be expected to require heavy-duty equipment, such as excavators, concrete mixers, etc. Consequently, the type and magnitude of noise that would be generated by the modifications to the building core and shell would be similar to the tenant improvement activities evaluated in the Final EIR. As discussed in the Final EIR, San Francisco Noise Ordinance Sections 2907 and 2908 limit noise from any individual piece of non-impact construction equipment to 80 dBA at 100 feet, and prohibit construction noise that exceeds 5 dBA over the ambient noise level at the nearest property line during the nighttime hours (i.e., between 8:00 p.m. and 7:00 a.m.), respectively. The same requirements would apply to the tenant improvement activities at 1946 Van Ness Avenue. Additionally, no pile driving or other construction equipment that could result in ground borne vibration would be used for the tenant improvements. Therefore, the additional tenant improvement work at 1946 Van Ness Avenue would primarily occur indoors and would be shielded from adjacent land uses, would not likely require heavy-duty construction equipment, and would be required to adhere to the San Francisco Noise Ordinance. Consequently, temporary noise impacts would be less than significant, and no mitigation measures are necessary. There would be no new significant impacts related to noise at 1946 Van Ness Avenue. Therefore, the revised project would not change the conclusions reached in the Final EIR regarding noise, and no new mitigation is required.

Permanent Noise Impacts

Long-term, operational sources of potential noise at 1946 Van Ness Avenue would include increased traffic, stationary sources, and student-generated noise. The institutional use proposed for 1946 Van Ness Avenue would be a non-sensitive use and thus no new sensitive receptors would be exposed to noise. The transportation analysis conducted for the revised project has determined that AAU's use of 1946 Van Ness Avenue would result in 1,386 daily person trips to and from the site. The majority of trips, however, would be associated either with a low-noise mode of transport (i.e., bicycle or walking), or with the existing transportation infrastructure (i.e., existing bus or AAU shuttle routes). The revised project would not require any additional transit or AAU shuttle trips to accommodate the use at 1946 Van Ness Avenue. All other trips (19 trips in the PM peak hour) would occur with a passenger vehicle. According to the revised project transportation analysis, existing volumes on Van Ness near 1946 Van Ness Avenue are approximately 1,830 vehicles in the PM peak hour. Existing volumes on Jackson and Washington Streets, two smaller streets adjacent to the site, are 320 and 200 vehicles in the PM peak hour, respectively. There would only be an increase in 19 vehicles in the PM peak hour, which is approximately 1 percent of current volumes on Van Ness and less than 10 percent of current volumes on Jackson and Washington Streets. Traffic noise typically produces a noticeable increase in noise (i.e., 3 decibels) when there is a doubling of the existing traffic volumes on a roadway. Because the increase in volumes from 1946 Van Ness Avenue would be comparatively small on any of the 3 adjacent roadways, the increase in noise would be less than 3 decibels, not detectable, and less than significant based on the criteria used in the EIR. Therefore, the revised project would not change the conclusions reached in the Final EIR regarding traffic noise, and no new mitigation is required.

The use at 1946 Van Ness Avenue could involve the installation and use of new stationary equipment, such as pumps, fans, air-conditioning apparatus, etc. Any stationary equipment currently located at the site would be considered to be part of the existing conditions and is not evaluated. These types of noise sources were evaluated in the EIR and were found to be less than significant with implementation of Mitigation Measure M-NO-2.1c, which requires demonstration that new mechanical equipment is compliant with Section 2909 of the city's Noise Ordinance. Compliance with Section 2909 of the city's Noise Ordinance would ensure that operational noise from new stationary sources at 1946 Van Ness Avenue would not increase substantially above ambient noise and would not result in noise levels considered to be incompatible with existing residential uses nearby (greater than 45 dBA between the hours of 10:00 p.m. to 7:00 a.m. or 55 dBA between the hours of 7:00 a.m. to 10:00 p.m. with windows open). Consequently, the revised project would not change the conclusions reached in the Final EIR regarding operational stationary source noise, and no new mitigation is required.

Student noise at 1946 Van Ness Avenue would be another potential source of operational noise. The Final EIR determined that, while the introduction of students in institutional sites could lead to loud music or other entertainment-related noise, any increase in noise would be consistent with a highly urbanized downtown environment. The instructional and classroom uses proposed for 1946 Van Ness Avenue would not be expected to include students yelling or the playing of loud music. Additionally, the Final EIR cited the city's Noise Ordinance as a method through which excessive noise could be satisfactorily addressed via complaints to the San Francisco Police Department. Therefore, noise impacts resulting from the introduction of students and faculty to 1946 Van Ness Avenue would be less than significant. The same conclusion would apply to 1946 Van Ness Avenue and any potential noise generated by students. Consequently, the revised project would not change the conclusions reached in the Final EIR regarding student noise, and no new mitigation is required.

1142 Van Ness Avenue (the Concordia Club)

Temporary Noise Impacts

Because no physical improvements are proposed at 1142 Van Ness Avenue, no noise-generating construction or renovation-related equipment would be used at the site. There would be no exterior changes to the building, and the changes to the interior of the building would be limited to the replacement of existing broken, worn out, or unsafe fixtures. The physical act of replacing fixtures is not considered to be a noise-intensive activity, because it would not involve noisy, heavy-duty equipment. Any noise that would occur from small hand tools or other minor equipment would be indoors and would not be audible at any nearby noise-sensitive land uses. Consequently, there would be no appreciable sources of noise that could generate temporary noise levels that are substantially above existing ambient noise levels, and the revised project temporary noise impacts would be less-than-significant. Therefore, the revised project would not change the conclusions reached in the Final EIR regarding temporary noise impacts, and no new mitigation is required.

Permanent Noise Impacts

Long-term, operational sources of potential noise at 1142 Van Ness Avenue would include increased traffic, stationary sources, and student-generated noise. The land use at 1142 Van Ness Avenue would not include residential or other sensitive uses and thus no new sensitive receptors would be exposed to noise. The transportation analysis conducted for the revised project has determined that AAU's use of 1142 Van Ness Avenue would result in 2,815 daily person trips to and from the site. The majority of trips, however, would either be with a low-noise mode of transport (i.e., bicycle or walking), or with the existing transportation infrastructure (i.e., existing bus or AAU shuttle routes). The revised project would not require any additional transit or AAU shuttle trips to accommodate the use at 1142 Van Ness Avenue. All other trips (39 trips in the PM peak hour) would occur with a passenger vehicle. According to the revised project transportation analysis, existing volumes on Van Ness near 1142 Van Ness Avenue are approximately 1,959 vehicles in the PM peak hour. Existing volumes on Geary Boulevard and Post Street are 750 and 620 vehicles in the PM peak hour, respectively. There would be an increase in 39 vehicles in the PM peak hour, which is approximately 2 percent of current volumes on Van Ness and less than 7 percent of current volumes on Geary Boulevard and Post Street. Traffic noise typically produces a noticeable increase in noise (i.e., 3 decibels) when there is a doubling of the existing traffic volumes on a roadway. Because the increase in volumes from 1142 Van Ness Avenue would be comparatively small on any of the three roadways, the increase in noise would be less than 3 decibels, a level that is not detectable, and would be less than

significant based on the criteria used in the EIR. Therefore, the revised project would not change the conclusions reached in the Final EIR regarding traffic noise, and no new mitigation is required.

The use at 1142 Van Ness Avenue could involve the installation and use of new stationary equipment, such as pumps, fans, air-conditioning apparatus, etc. Any stationary equipment current located at the site would be considered to be part of the existing conditions and is not evaluated. These types of noise sources were evaluated in the EIR and were found to be less than significant with implementation of Mitigation Measure M-NO-2.1c, which requires demonstration that new mechanical equipment is compliant with Section 2909 of the city's Noise Ordinance. Compliance with Section 2909 of the city's Noise Ordinance would ensure that operational noise from new stationary sources at 1142 Van Ness Avenue does not increase substantially above ambient noise and does not result in noise levels considered to be incompatible with existing residential uses nearby (greater than 45 dBA between the hours of 10:00 p.m. to 7:00 a.m. or 55 dBA between the hours of 7:00 a.m. to 10:00 p.m. with windows open). Consequently, the revised project would not change the conclusions reached in the Final EIR regarding operational stationary source noise, and no new mitigation is required.

Student noise at 1142 Van Ness Avenue would be another potential source of operational noise. The Final EIR determined that, while the introduction of students in institutional sites could lead to loud music or other entertainment-related noise, any increase in noise would be consistent with a highly urbanized downtown environment. Similar to the proposed change of use at 1946 Van Ness, the proposed instructional and classroom use at 1142 Van Ness Avenue would not be expected to include loud music or other entertainment-related noise. Additionally, the Final EIR cited the city's Noise Ordinance as a method through which excessive noise could be handled via complaints to the San Francisco Police Department. The same conclusion would apply to 1142 Van Ness Avenue and any potential noise generated by students. Consequently, the revised project would not change the conclusions reached in the Final EIR regarding student noise, and no new mitigation is required.

2550 Van Ness Avenue (the Da Vinci Hotel)

Temporary Noise Impacts

The revised project would result in permitting changes at 2550 Van Ness Avenue but would involve minimal physical changes to the building. To convert the building from a tourist hotel to student housing, tenant improvements would occur within the interior of the building but would be limited to the replacement of hotel furnishings with student dormitory furnishings. The physical act of replacing the furnishings is not considered to be a noise-intensive activity, because it would not involve noisy, heavy-duty equipment. Any noise that does occur from small hand tools or other minor equipment would be indoors and would not be audible at any nearby noise-sensitive land uses. Delivery and removal of furnishings to/from the site would likely involve moving trucks on the surrounding roadways, but it is unlikely that the number of moving truck trips required to replace the furnishings at a 136 room hotel would change the existing roadway noise levels in the vicinity of the building in a noticeable manner. Because no heavy-duty construction equipment would be required that could potentially create temporary substantial increases in noise or vibration, the revised project would continue to result in a less-than-significant impact. Therefore, the revised project would not change the conclusions reached in the Final EIR regarding temporary noise impacts, and no new mitigation is required.

Permanent Noise Impacts

The changes occurring at 2550 Van Ness Avenue would result in minor changes to the current operational noise sources located at the site. The transportation analysis conducted for the revised project has determined that AAU's use of 2550 Van Ness Avenue would result in a net decrease of 17 passenger vehicle trips to and from the site relative to the current use as a tourist hotel. The number of trips to and from the site using any mode of transport would increase overall, but most of the trips would use a low-noise mode of transport (i.e., bicycle or walking), or the existing transportation infrastructure (i.e., existing bus or AAU shuttle routes), which would not increase the existing noise environment. Students are more likely to use bicycle, walking, or public transit modes of transport than the users of a tourist hotel, who would be more likely to use passenger vehicles. As such, there would be 17 fewer noise-generating trips as a student dormitory according to the transportation analysis. The use of 2550 Van Ness Avenue, then, would not result in any additional traffic noise, because there would be fewer passenger vehicles traveling to the site. Therefore, the revised project would not change the conclusions reached in the Final EIR regarding traffic noise, and no new mitigation is required.

The use at 2550 Van Ness Avenue could involve the installation and use of new stationary equipment, such as pumps, fans, air-conditioning apparatus, etc. Any stationary equipment current located at the site would be considered to be part of the existing conditions and is not evaluated. These types of noise sources were evaluated in the EIR and were found to be less than significant with implementation of Mitigation Measure M-NO-2.1c, which requires demonstration that new mechanical equipment is compliant with Section 2909 of the city's Noise Ordinance. Compliance with Section 2909 of the city's Noise Ordinance would ensure that operational noise from new stationary sources at 2550 Van Ness Avenue does not increase substantially above ambient noise and does not result in noise levels considered to be incompatible with existing residential uses nearby (greater than 45 dBA between the hours of 10:00 p.m. to 7:00 a.m. or 55 dBA between the hours of 7:00 a.m. to 10:00 p.m. with windows open). Consequently, the revised project would not change the conclusions reached in the Final EIR regarding operational stationary source noise, and no new mitigation is required.

Under the revised project, the 136 rooms currently serving tourists at the Da Vinci Hotel would become rooms for up to 306 students. While some increase in noise from students may periodically occur, it would not be substantially greater in magnitude to the current user noise at the hotel. As such, the use of 2550 Van Ness Avenue would not significantly change the level of noise from site users (i.e., music and other entertainment-related noise) in an appreciable manner. Consequently, the revised project would not change the conclusions reached in the Final EIR regarding student noise, and no new mitigation is required.

The current building at 2550 Van Ness Avenue is a tourist hotel and is considered a noise-sensitive land use. Converting the building to a student dormitory, which also would be a noise-sensitive land use, could result in an increase in the potential number of individuals who could be exposed to potentially significant ambient noise levels. The tourist hotel likely has a number of vacant rooms on any given day or rooms that are occupied by a single person, while the student dormitory would more likely be fully occupied on most days with two occupants per room. Consequently, converting 2550 Van Ness Avenue from a tourist hotel to a student dormitory would site new sensitive receptors, and, as such, Mitigation Measure M-NO-2.1b would apply. Mitigation Measure M-NO-2.1b, Siting of Noise-Sensitive Uses, requires the preparation of a noise analysis that includes a site survey to identify noise-generating uses within 900 feet of, and with a direct line-of-sight to, the project site, and at least one 24-hour noise measurement. The analysis required

by this mitigation measure would need to demonstrate that the acceptable interior noise levels consistent with the Title 24 Standards can be attained, prior to project approval. With implementation of Mitigation Measure M-NO-2.1b, new sensitive receptors at 2550 Van Ness Avenue would not be exposed to noise in excess of the Title 24 Standards. The revised project would not change the conclusions reached in the Final EIR regarding sensitive receptor exposure, and no new mitigation is required.

2801 Leavenworth Street (the Cannery)

Temporary Noise Impacts

The revised project would result in permitting changes at 2801 Leavenworth Street but would involve few physical changes at the building. There would be no exterior changes to the building, and the changes to the interior of the building would be limited to the replacement of existing broken, worn out, or unsafe fixtures. The physical act of replacing fixtures is not considered to be a noise-intensive activity, because it would not involve noisy, heavy-duty equipment. Any noise that does occur from small hand tools or other minor equipment would be indoors and would not be audible at any nearby noise-sensitive land uses. Because no heavy-duty construction equipment would be required that could potentially create temporary substantial increases in noise or vibration, the revised project would continue to result in a less-than-significant impact. Therefore, the revised project would not change the conclusions reached in the Final EIR regarding temporary noise impacts, and no new mitigation is required.

Permanent Noise Impacts

The changes occurring at 2801 Leavenworth Street would, overall, result in minor changes to the current operational noise sources located at the site. As determined in the transportation analysis conducted for the revised project, the changes to 2801 Leavenworth Street would result in a net decrease of 39 vehicle trips relative to the existing conditions. The use of 2801 Leavenworth Street, then, would not result in any additional traffic noise, because there would be 39 fewer noise-generating passenger vehicles traveling to the site. Therefore, the revised project would not change the conclusions reached in the Final EIR regarding traffic noise, and no new mitigation is required.

The permitting changes at 2801 Leavenworth Street would not drastically change the types of uses in the building; thus, it is unlikely that any changes to stationary equipment, such as pumps, fans, air-conditioning apparatus, etc. would be required. Stationary source noise impacts, then, would remain unchanged from the Final EIR. In the event that any new stationary equipment is required at 2801 Leavenworth Street, it would comply with the city's Noise Ordinance. Stationary source noise was evaluated in the EIR and was found to be less than significant with implementation of Mitigation Measure M-NO-2.1c, which requires demonstration that new mechanical equipment is compliant with Section 2909 of the city's Noise Ordinance. Compliance with Section 2909 of the city's Noise Ordinance would ensure that operational noise from new stationary sources, if necessary, at 2801 Leavenworth Street does not increase substantially above ambient noise and does not result in noise levels considered to be incompatible with existing residential uses nearby (greater than 45 dBA between the hours of 10:00 p.m. to 7:00 a.m. or 55 dBA between the hours of 7:00 a.m. to 10:00 p.m. with windows open). Consequently, the revised project would not change the conclusions reached in the Final EIR regarding operational stationary source noise, and no new mitigation is required.

Student and other site-user noise at 2801 Leavenworth Street would be approximately the same as discussed for the Final EIR, because the site uses would not drastically change as a result of the revised

project. Consequently, the revised project would not change the conclusions reached in the Final EIR regarding student noise, and no new mitigation is required.

2225 Jerrold Avenue

Temporary Noise Impacts

The revised project at 2225 Jerrold Avenue would consist primarily of interior modifications and minor exterior modifications related to pedestrian and bicycle infrastructure to provide safe access to the community facility on-site. Interior changes to the existing building would not involve heavy equipment and indoor construction noise would largely be shielded from any nearby noise-sensitive uses in the surrounding area. Exterior construction would also be limited and would not require heavy equipment or substantial ground disturbance and excavation, except for improvements to pedestrian and bicycle infrastructure. Such construction would be temporary in nature and would not generate substantial construction-related noise.

Because no heavy-duty construction equipment would be required that could potentially create temporary substantial increases in noise or vibration, the revised project would continue to result in a less-than-significant impact. Therefore, the revised project would not change the conclusions reached in the Final EIR regarding temporary noise impacts, and no new mitigation is required.

Permanent Noise Impacts

The revised project would change the uses on-site from a recreational facility for AAU students and staff to community use. The revised project would not increase vehicle trips to the site, including shuttles. Therefore, the revised project would not result in additional traffic noise and the conclusions reached in the Final EIR regarding traffic noise would not change. No new mitigation is required.

If any new noise-generating stationary equipment such as fan or air-conditioning apparatuses are required, it would comply with the city's Noise Ordinance. Stationary source noise was evaluated in the EIR and was found to be less than significant with implementation of Mitigation Measure M-NO-2.1c, which requires demonstration that new mechanical equipment is compliant with Section 2909 of the city's Noise Ordinance. Compliance with Section 2909 of the city's Noise Ordinance would ensure that operational noise from new stationary sources, if necessary, at 2225 Jerrold Avenue would not increase substantially above ambient noise and would not result in noise levels considered to be incompatible with existing residential uses nearby (greater than 45 dBA between the hours of 10:00 p.m. to 7:00 a.m. or 55 dBA between the hours of 7:00 a.m. to 10:00 p.m. with windows open). Consequently, the revised project would not change the conclusions reached in the Final EIR regarding operational stationary source noise, and no new mitigation is required.

Conclusion

The revised project would not change any of the Final EIR's findings with respect to noise and vibration impacts. There is no new information of substantial importance, such as new regulations, a change of circumstances (e.g., physical changes to the environment as compared to 2010), or changes to the project that would give rise to new significant environmental effects or a substantial increase in the severity of previously identified significant effects. Conclusions from this analysis remain the same as those reached

in the Final EIR related to noise and vibration, both on a project-related and cumulative basis. As discussed above, Mitigation Measure M-NO-2.1c would continue to apply to the revised project.

4.7 Air Quality

The air quality analysis in the Final EIR assessed air quality impacts under both a full occupancy scenario and a partial occupancy scenario. The partial occupancy scenario was developed to capture worst case ROG emissions, and assumes occupancy of all but 200,000 square feet of the 779,670 square feet of the space AAU might occupy under the original project; the remaining 200,000 square feet would be under rennovation while the other 579,670 square feet would be in operation by AAU. The full occupancy scenario represents the combined total of all AAU operations from the project sites and study areas.

The Final EIR evaluated the impact of tenant improvements, such as painting, seismic retrofit work, and installing fire sprinkler systems, and determined that simultaneous renovation of 100,000 square feet of building space, as part of a partial occupancy scenario[24], would not exceed the air quality district's significance thresholds. Mitigation Measure M-AQ-3.3 of the Final EIR limits renovation to a maximum of 100,000 square feet of building space at a time.

The Final EIR determined that the original project would not violate an air quality standard or contribute substantially to an existing violation during the renovation activities in the study areas and at the project sites either under the full occupancy operational scenario or under the partial occupancy scenario. The Final EIR also determined that neither construction activities nor operations, including growth in shuttle bus emissions, would result in toxic air contaminant emissions that would expose sensitive receptors to substantial pollution concentrations; nor would the original project conflict with an applicable air quality plan or generate objectionable odors, as concluded in the Final EIR. The revised project would not change any of these findings, as further discussed below.

1055 Pine Street, 1069 Pine Street, 700 Montgomery Street, 2295 Taylor Street, 2340 Stockton Street, 168 Bluxome Street, 150 Hayes Street, 460 Townsend Street and 121 Wisconsin Street

Under the revised project, AAU would vacate 1055 Pine Street, 1069 Pine Street, 700 Montgomery Street, 2295 Taylor Street, 2340 Stockton Street, 168 Bluxome Street, 150 Hayes Street, 460 Townsend Street and 121 Wisconsin Street. AAU would not make any interior or exterior modifications to these buildings and the change of use application would be withdrawn, resulting in no additions or changes to any of the buildings. Any future modifications or changes of use at these sites would be subject to separate CEQA review.

Therefore, because no modifications at 1055 Pine Street, 1069 Pine Street, 700 Montgomery Street, 2295 Taylor Street, 2340 Stockton Street, 168 Bluxome Street, 150 Hayes Street, 460 Townsend Street and 121 Wisconsin Street would occur the sites would be vacated, the revised project at these properties would not increase fugitive dust, criteria pollutant, toxic air contaminant, or odor emissions. Emissions associated with renovation and operation of these three buildings, as analyzed in the Final EIR, would no longer be

[24] The partial occupancy scenario is defined as the occupancy of all but 200,000 square feet of the 779,670 square feet space that AAU was assumed to have occupied in the Final EIR. Emissions from the Partial Study Area Occupancy scenario of the Final EIR are the combined total of operational emissions (shuttle bus emissions, non-shuttle vehicle emissions, natural gas combustion, and landscaping emissions) from the Final EIR project sites and 579,670 sf of the Final EIR study areas, plus the construction emissions from the final 200,000 sf of remaining study area renovations.

generated when AAU vacates these properties. The transportation analysis conducted for the revised project determined that vacating each of these sites would result in a net decrease in trips relative to the existing conditions and hence a decrease in VMT and the corresponding criteria pollutant emissions. The revised project at 1055 Pine Street, 1069 Pine Street, 700 Montgomery Street, 2295 Taylor Street, 2340 Stockton Street, 168 Bluxome Street, 150 Hayes Street, 460 Townsend Street and 121 Wisconsin Street would not conflict with the air quality district's 2017 Clean Air Plan, because vacating these buildings would result in less criteria pollutant emissions than was evaluated in the Final EIR.

The revised project involves AAU vacating 1055 Pine Street, 1069 Pine Street, 700 Montgomery Street, 2295 Taylor Street, 2340 Stockton Street, 168 Bluxome Street, 150 Hayes Street, 460 Townsend Street and 121 Wisconsin Street and converting other existing buildings for AAU use. Vacation of 1055 Pine Street, 1069 Pine Street, 700 Montgomery Street, 2295 Taylor Street, 2340 Stockton Street, 168 Bluxome Street, 150 Hayes Street, 460 Townsend Street and 121 Wisconsin Street would not worsen any air quality impacts discussed in the Final EIR. Consequently, the revised project would not change the conclusions reached in the Final EIR, and no new mitigation is required.

1946 Van Ness Avenue (the Bakery)

Construction

The conversion to a post-secondary educational institutional use at 1946 Van Ness Avenue would require minor modifications to the base building core and shell to bring the building into compliance with current life safety codes. This tenant improvement work would primarily occur within the interior of the building and would not be expected to require heavy-duty equipment, such as excavators, concrete mixers, etc., and this requirement would apply to any tenant improvement activities at 1946 Van Ness Avenue. Therefore, the revised project would not change the conclusions reached in the Final EIR, and no new mitigation is required.

With respect to construction sources of toxic air contaminant emissions, tenant improvements at 1946 Van Ness Avenue would involve minimal use of diesel-powered equipment. Because the site is not located in an air pollution exposure zone, it would not be subject to the construction emissions minimization plan requirement that is specified in the Final EIR. Although the amount of diesel equipment required is anticipated to be minor if it is required at all, the use of diesel equipment outside of an air pollution exposure zone for the tenant improvement activities is not considered to be a significant impact, based on the criteria used in the Final EIR. Further, the Mitigation Measure M-AQ-3.3 limit of 100,000 square feet of building space at a given time would apply to any improvement activities at 1946 Van Ness Avenue. Therefore, the revised project would not change the conclusions reached in the Final EIR with respect to construction toxic air contaminant emissions, and no new mitigation is required.

Operation

With respect to criteria air pollutant emissions, the transportation analysis conducted for the revised project determined that the change of use at 1946 Van Ness Avenue would result in an increase of 19 daily vehicle trips to and from the site that could result in additional emissions. Regarding operation of the building, the proposed use of 1946 Van Ness Avenue would result in approximately 25,840 square feet of AAU-operated institutional space. Building-related emissions would be associated with heating, ventilation and air conditioning.

The addition of 19 vehicle trips during the peak hour (see Table 5) with the change of use at 1946 Van Ness Avenue would not affect the conclusion in the Final EIR with respect to local carbon monoxide impacts when considering the net loss of 19 vehicle trips indicated in Table 5 that would occur with implementation of the revised project. The additional 25,840 square feet of institutional space proposed for 1946 Van Ness Avenue would not result in a substantial increase in emissions analyzed in the Final EIR when considering the relatively minor net increase in total institutional space of 454 square feet and 29 beds that would occur with implementation of the revised project.

With respect to toxic air contaminants, the use of 1946 Van Ness Avenue would not include any substantial sources of toxic air contaminants. No diesel generator is currently located at 1946 Van Ness Avenue, and there is no intention to add one at the site. The Final EIR evaluated the worst-case scenario for mobile source toxic air contaminant emissions from the AAU shuttles. According to the transportation analysis, the use of 1946 Van Ness Avenue would not require an increase in the number of shuttles that AAU would operate; however, an additional shuttle stop is proposed at 1604 Broadway. The addition of a shuttle stop without any increase in the number of shuttles would not result in more emissions than the worst-case analysis from the Final EIR, which accounted for growth in shuttle use commensurate with the higher student growth projections evaluated in the Final EIR. However, as discussed above, student growth is anticipated to be substantially lower than projected. Consequently, there would be no further impacts pertaining to operational toxic air contaminant emissions at 1946 Van Ness Avenue from the revised project.

Additionally, implementation of the revised project at 1946 Van Ness Avenue would not conflict with the air quality district's 2017 Clean Air Plan, and it would not change the conclusions reached in the Final EIR, and no new mitigation is required.

1142 Van Ness Avenue (the Concordia Club)

Construction

The conversion of 1142 Van Ness Avenue to a post-secondary educational institutional use would include no exterior changes to the building, and the changes to the interior of the building would be limited to some re-painting of walls and to the replacement of existing broken, worn out, or unsafe fixtures. The replacement of fixtures would not be an activity that would be of concern regarding air quality, because it would not likely involve the use of gas- or diesel-powered equipment, or substantial paint application that could result in off-gassing related emissions. Therefore, substantial air quality impacts are not anticipated for the limited construction activities that could occur at 1142 Van Ness Avenue. Further, the Mitigation Measure M-AQ-3.3 limit of 100,000 square feet of building space at a given time would apply to any improvement activities at 1142 Van Ness Avenue. Therefore, the revised project would not change the conclusions reached in the Final EIR, and no new mitigation is required.

With respect to construction sources of toxic air contaminant emissions, the limited tenant improvements at 1142 Van Ness Avenue would not likely involve the use of diesel-powered equipment. Because the site is not located in an air pollution exposure zone, it would not be subject to the construction emissions minimization plan requirement that is specified in the Final EIR. Although the amount of diesel equipment required is anticipated to be minor if it is required at all, the use of diesel equipment outside of an air pollution exposure zone for the tenant improvement activities is not considered to be a significant impact, based on the criteria used in the Final EIR. Therefore, the revised project would not change the conclusions

reached in the Final EIR with respect to construction toxic air contaminant emissions, and no new mitigation is required.

Operation

With respect to criteria air pollutant emissions, the transportation analysis conducted for the revised project determined that the change of use at 1142 Van Ness Avenue would result in a net increase of 39 daily vehicle trips to and from the site that could result in additional emissions. Regarding operation of the building, the proposed use of 1142 Van Ness Avenue would result in approximately 50,221 square feet of AAU-operated institutional space. Building-related emissions would be associated with heating, ventilation and air conditioning.

The addition of 39 vehicle trips during the peak hour (see Table 5) with the change of use at 1142 Van Ness Avenue would not affect the conclusion in the Final EIR with respect to local carbon monoxide impacts when considering the net loss of 19 vehicle trips indicated in Table 5 that would occur with implementation of the revised project. The additional 25,840 square feet of institutional space proposed for 1142 Van Ness Avenue would not result in a substantial increase in emissions analyzed in the Final EIR when considering the relatively minor net increase in total institutional space of 454 square feet and 29 beds that would occur with implementation of the revised project.

With respect to toxic air contaminants, the use of 1142 Van Ness Avenue would not include any substantial sources of toxic air contaminants. No diesel generator is currently located at 1946 Van Ness Avenue, and there is no intention to add one at the site. The Final EIR evaluated the worst-case scenario for mobile source toxic air contaminant emissions from the AAU shuttles. According to the transportation analysis, the use of 1142 Van Ness Avenue would not require an increase in the number of shuttles that AAU would operate; however, an additional shuttle stop is proposed at 1604 Broadway Avenue. The addition of a shuttle stop without any increase in the number of shuttles would not result in more emissions than the worst-case analysis from the Final EIR, which accounted for growth in shuttle use commensurate with the higher student growth projections evaluated in the Final EIR. However, as discussed previously, student growth is anticipated to be substantially lower than projected. Consequently, there would be no further impacts pertaining to operational toxic air contaminant emissions at 1142 Van Ness Avenue from the revised project.

Additionally, implementation of the revised project at 1142 Van Ness Avenue would not conflict with the air quality district's 2017 Clean Air Plan, and it would not change the conclusions reached in the Final EIR, and no new mitigation is required.

2550 Van Ness Avenue (the Da Vinci Hotel)

Construction

The revised project would result in the use of 2550 Van Ness Avenue to replace student housing space vacated at other AAU buildings. There would be no exterior changes to the building, and the changes to the interior of the building would be limited to the replacement of hotel furnishings with student furnishings. The replacement of furnishings would not generate substantial air emissions, because it would not likely involve the use of gas- or diesel-powered equipment, or substantial paint application that could result in off-gassing related emissions. Therefore, substantial air quality impacts are not anticipated for the limited construction activities that could occur at 2550 Van Ness Avenue. Further, the Mitigation Measure

M-AQ-3.3 limit of 100,000 square feet of building space at a given time would apply to any improvement activities at 2550 Van Ness Avenue. Therefore, the revised project would not change the conclusions reached in the Final EIR, and no new mitigation is required. Therefore, the revised project would not change the conclusions reached in the Final EIR, and no new mitigation is required.

With respect to construction sources of toxic air contaminant emissions, the use of 2550 Van Ness Avenue would not likely involve the use of diesel-powered equipment. Because the site is not located in an air pollution exposure zone, it would not be subject to the construction emissions minimization plan requirement that is specified in the Final EIR. Although the amount of diesel equipment required is anticipated to be minor if it is required at all, the use of diesel equipment outside of an air pollution exposure zone for the tenant improvement activities is not considered to be a significant impact, based on the criteria used in the Final EIR. Therefore, the revised project would not change the conclusions reached in the Final EIR with respect to construction toxic air contaminant emissions, and no new mitigation is required.

Operation

With respect to criteria air pollutant emissions, the transportation analysis conducted for the revised project determined that the change of use at 2550 Van Ness Avenue would result in a net decrease of 17 PM peak hour vehicle trips to and from the site that could result in additional emissions. Regarding operation of the building, the proposed use of 2550 Van Ness Avenue would result in approximate maximum of 54,298 square feet of AAU-operated residential space. Building-related emissions would be associated with heating, ventilation and air conditioning.

The decrease of 17 vehicle trips during the peak hour (see Table 5) with the change of use at 2550 Van Ness Avenue would not affect the conclusion in the Final EIR with respect to local carbon monoxide impacts when considering the net loss of 19 vehicle trips indicated in Table 5 that would occur with implementation of the revised project. The additional 25,840 square feet of institutional space proposed for 2550 Van Ness Avenue would not result in a substantial increase in emissions analyzed in the Final EIR when considering the relatively minor net increase in total institutional space of 454 square feet and 29 beds that would occur with implementation of the revised project. Further, the change of use at 2550 Van Ness Avenue would result in a decrease in VMT relative to the existing conditions, according to the transportation analysis. Students are more likely to use bicycle, walking, or public transit modes of transport than the users of a tourist hotel, who would be more likely to use passenger vehicles. As such, there would not be any additional emissions from vehicles associated with 2550 Van Ness Avenue. Furthermore, as shown in Table 5, the net effect of the revised project would be a decrease in 17 PM peak hour vehicle trips per day.

With respect to toxic air contaminants, the use of 2550 Van Ness Avenue would not include any substantial sources of toxic air contaminants. No diesel generator is currently located at 2550 Van Ness Avenue, and there is no intention to add one at the site. According to the transportation analysis, the use of 2550 Van Ness Avenue would not require an increase in the number of shuttles that AAU would operate; however, additional shuttle stops are proposed at 2151 Van Ness Avenue, 1604 Broadway, and 1142 Van Ness Avenue. The addition of three shuttle stops without any increase in the number of shuttles would not result in more emissions than the worst-case analysis from the Final EIR, which accounted for growth in shuttle use commensurate with the higher student growth projections evaluated in the Final EIR. However, as discussed above, student growth is anticipated to be substantially lower than projected. Consequently,

there would be no further impacts pertaining to operational toxic air contaminant emissions at 2550 Van Ness Avenue from the revised project.

Additionally, implementation of the revised project at 2550 Van Ness Avenue would not conflict with the air quality district's 2017 Clean Air Plan, and it would not change the conclusions reached in the Final EIR, and no new mitigation is required.

2801 Leavenworth Street (the Cannery)

Construction

The revised project would result in the use of the ground floor of 2801 Leavenworth Street as a publicly-accessible retail space. There would be no exterior changes to the building, and the changes to the interior of the building would be limited to minor renovations. These minor renovations would not generate substantial air emissions because they would not likely involve the use of gas- or diesel-powered equipment, or substantial paint application that could result in off-gassing related emissions. Therefore, substantial air quality impacts are not anticipated for the limited construction activities that could occur at 2801 Leavenworth Street. Furthermore, Mitigation Measure M-AQ-3.3 would limit the amount of construction to 100,000 square feet of building space at a given time would apply to any improvement activities at 2801 Leavenworth Street. Therefore, the revised project would not change the conclusions reached in the Final EIR, and no new mitigation is required. Therefore, the revised project would not change the conclusions reached in the Final EIR, and no new mitigation is required.

With respect to construction sources of toxic air contaminant emissions, the change of use at 2801 Leavenworth Street would not likely involve the use of diesel-powered equipment. However, because the site is in the air pollution exposure zone, any use of diesel equipment that is required would be subject to Mitigation Measure M-AQ-2.1 from the Final EIR. If diesel equipment is used at the site, the project sponsor is required to submit a construction emissions minimization plan to the city for review that documents compliance with measures to reduce emissions from diesel equipment. Thus, diesel construction emissions at 2801 Leavenworth Street would be minimized if they occur at all and would be less than significant. Therefore, the revised project would not change the conclusions reached in the Final EIR, and no new mitigation is required.

Operation

The changes occurring at 2801 Leavenworth Street would result in minor changes to operational emissions. While the Final EIR evaluated the entire 133,675 square foot 2801 Leavenworth building as institutional space, the revised project would change 4,142 square feet to retail space, 2,745 square feet to multi-functional space, and 409 square feet to storage. These modifications would not result in an appreciable change in the building's operational emissions as compared to what was evaluated in the Final EIR, because the sources of operational emissions for institutional, retail, multi-functional, and storage space are of a similar nature and magnitude. Additionally, the building would be used in the same fundamental manner despite the change in use (i.e. institutional and retail space would both use natural gas, require occasional landscaping equipment, and generate consumer product emissions). There would be no further impacts pertaining to operational criteria pollutant emissions at 2801 Leavenworth Street from the revised project.

The change of use at 2801 Leavenworth Street would result in a decrease in VMT relative to the existing conditions, according to the transportation analysis. As such, there would not be any additional emissions

from vehicles associated with 2801 Leavenworth Street. Furthermore, as shown in Table 5, the net effect of the revised project would be a decrease in 17 vehicle trips during the PM peak hour period.

With respect to operational sources of toxic air contaminant emissions, the change of use at 2801 Leavenworth Street would not include the use of any substantial sources of toxic air contaminants. There is no diesel generator at 2801 Leavenworth, and there is no intention to add one at the site. The Final EIR evaluated the worst-case scenario for mobile source toxic air contaminant emissions from the AAU shuttles, and, because the change of use at 2801 Leavenworth Street would decrease the number of students riding the AAU shuttles[25], the revised project would not result in more emissions than the worst case analysis from the Final EIR. Consequently, there would be no further impacts pertaining to operational toxic air contaminant emissions at 2801 Leavenworth Street from the revised project.

2225 Jerrold Avenue

Construction

The original project analyzed AAU's proposed use as AAU office space, storage area for AAU bus operations, mechanical/janitorial functions, and other miscellaneous storage for AAU purposes, along with approximately 22,683 square feet for SFFD storage use. In addition, the original project analyzed the inclusion of an approximately 17,533 square-foot AAU basketball court and weight room for students and staff. Under the revised project, AAU would revise its change of use application to replace the initially proposed AAU recreational facilities with an approximately 15,084 square foot community facility that is open to the public and includes a multi-purpose recreation room and indoor and outdoor community facility lounge spaces.

The proposed change of use to a community facility would not require substantial construction activities that would generate substantial air emissions because they would not likely involve the use of gas- or diesel-powered equipment, or substantial paint application that could result in off-gassing related emissions. Therefore, substantial air quality impacts are not anticipated for the limited construction activities that could occur at 2225 Jerrold Avenue. Furthermore, Mitigation Measure M-AQ-3.3, which would limit the amount of construction to 100,000 square feet of building space on AAU properties at a given time, would include any improvement activities at 2225 Jerrold Avenue. Therefore, the revised project would not change the conclusions reached in the Final EIR, and no new mitigation is required. Therefore, the revised project would not change the conclusions reached in the Final EIR, and no new mitigation is required.

With respect to construction sources of toxic air contaminant emissions, the change of use at 2225 Jerrold Avenue would not likely involve the use of diesel-powered equipment. However, because the site is in the Article 38 Air Pollution Exposure Zone, any use of diesel equipment that is required would be subject to Mitigation Measure M-AQ-2.1 from the Final EIR. If diesel equipment is used at the site, the project sponsor is required to submit a construction emissions minimization plan to the city for review that documents compliance with measures to reduce emissions from diesel equipment. Thus, diesel construction emissions at 2225 Jerrold Avenue would be minimized if they occur at all and would be less than significant.

[25] This conclusion is based on the transportation analysis conducted for the revised project.

Therefore, the revised project would not change the conclusions reached in the Final EIR, and no new mitigation is required.

Operation

The revised project would change the use of the site from a recreational facility for AAU students and staff to a publicly accessible community facility. In addition, the revised project includes pedestrian and bicycle infrastructure improvements to provide safe access to the site. These modifications would not result in an appreciable change in the building's operational emissions as compared to what was evaluated in the Final EIR because the sources of operational emissions would be the same and the building would be used in the same fundamental manner, despite the change of use. There would be no further impacts pertaining to operational criteria pollutant emissions at 2225 Jerrold Avenue from the revised project.

The change of use at 2225 Jerrold Avenue would not result in a substantial change in VMT relative to the existing conditions, according to the transportation analysis. As such, there would not be any additional emissions from vehicles associated with 2225 Jerrold Avenue.

With respect to operational sources of toxic air contaminant emissions, the change of use at 2225 Jerrold Avenue would not include the use of any substantial sources of toxic air contaminants. There is no diesel generator at 2225 Jerrold Avenue, and there is no proposal to add one at the site. The Final EIR evaluated the worst-case scenario for mobile source toxic air contaminant emissions for the site, and because the change of use at 2225 Jerrold Avenue would not change the number of vehicle trips to the project site, including shuttles, the revised project would not result in more emissions than the worst-case analysis from the Final EIR. Consequently, there would be no additional impacts pertaining to operational toxic air contaminant emissions at 2225 Jerrold Avenue from the revised project.

Conclusion

The revised project would not change any of the Final EIR's findings with respect to air quality impacts. There is no new information of substantial importance, such as new regulations, a change of circumstances (e.g., physical changes to the environment as compared to 2010), or changes to the project that would give rise to new significant environmental effects or a substantial increase in the severity of previously identified significant effects. This analysis does not result in any different conclusions than those reached in the Final EIR related to air quality impacts, either on a project-related or cumulative basis.

4.8 Greenhouse Gas Emissions

The Final EIR determined that the original project would not generate greenhouse gas emissions that would result in a cumulatively considerable impact on the environment, or conflict with any policy, plan, or regulation, adopted for reducing greenhouse gas emissions within the study areas or at the project sites.

As discussed in the Final EIR, the original project would be consistent with San Francisco's energy and conservation standards, as reflected in San Francisco's Greenhouse Gas (GHG) Reduction Strategy, and compliance with the strategy would reduce specific sources of GHG emissions that would otherwise occur. San Francisco has been successful in meeting its stated GHG reduction goal through implementation of the strategy, and those goals are consistent with state GHG reduction goals. Therefore, the revised project, if

consistent with the GHG Reduction Strategy, would also be consistent with the GHG emissions reduction goals of EO S-3-05, EO B-30-15, AB 32, SB 32, and the Bay Area 2017 Clean Air Plan.

1055 Pine Street, 1069 Pine Street, 700 Montgomery Street, 2295 Taylor Street, 2340 Stockton Street, 168 Bluxome Street, 150 Hayes Street, 460 Townsend Street and 121 Wisconsin Street

Under the revised project, AAU would vacate 1055 Pine Street, 1069 Pine Street, 700 Montgomery Street, 2295 Taylor Street, 2340 Stockton Street, 168 Bluxome Street, 150 Hayes Street, 460 Townsend Street and 121 Wisconsin Street. AAU would not make any interior or exterior modifications to these buildings and the change of use applications would be withdrawn, resulting in no additions or changes to any of the buildings. Any future modifications or changes of use at these sites would be subject to separate CEQA review.

Therefore, because no modifications at 1055 Pine Street, 1069 Pine Street, 700 Montgomery Street, 2295 Taylor Street, 2340 Stockton Street, 168 Bluxome Street, 150 Hayes Street, 460 Townsend Street and 121 Wisconsin Street would occur, the revised project at 1055 Pine Street, 1069 Pine Street, 700 Montgomery Street, 2295 Taylor Street, 2340 Stockton Street, 168 Bluxome Street, 150 Hayes Street, 460 Townsend Street and 121 Wisconsin Street would not increase greenhouse gas emissions. Consequently, the revised project would not change the conclusions reached in the Final EIR, and no new mitigation is required.

1946 Van Ness Avenue (the Bakery)

The revised project at 1946 Van Ness Avenue would be subject to and required to comply with several regulations adopted to reduce GHG emissions as identified in the GHG Reduction Strategy. Regulations applicable to 1946 Van Ness Avenue include the Commuter Benefits Ordinance, the Commercial Water Conservation Ordinance, and the Mandatory Recycling and Composting Ordinance. The consistency of the proposed 1946 Van Ness Avenue use with the city's GHG Reduction Strategy is demonstrated by the city's Compliance Checklist.[26]

Because the revised project at 1946 Van Ness Avenue would be consistent with the city's GHG Reduction Strategy, it would not conflict with any plans adopted for reducing GHG emissions and would not exceed San Francisco's applicable GHG emissions threshold of significance. Moreover, the additional use of 1946 Van Ness Avenue would not change the consistency of the original project with the city's GHG Reduction Strategy. As such, the revised project would not result in a significant increase in GHG emissions compared to the GHG emissions analyzed in the Final EIR. No mitigation measures are necessary.

1142 Van Ness Avenue (the Concordia Club)

The revised project at 1142 Van Ness Avenue would be subject to and required to comply with several regulations adopted to reduce GHG emissions as identified in the GHG Reduction Strategy. Regulations applicable to 1142 Van Ness Avenue include the Commuter Benefits Ordinance, the Emergency Ride Home Program, and the Mandatory Recycling and Composting Ordinance. The consistency of the proposed 1142 Van Ness Avenue use with the city's GHG Reduction Strategy is demonstrated by the city's Compliance Checklist.[27]

[26] San Francisco Planning Department, Greenhouse Gas Analysis: Compliance Checklist for 1946 Van Ness Avenue, February 23, 2019.

[27] San Francisco Planning Department, Greenhouse Gas Analysis: Compliance Checklist for 1142 Van Ness Avenue, February 23, 2019.

Because the revised project at 1142 Van Ness Avenue would be consistent with the city's GHG Reduction Strategy, it would not conflict with any plans adopted for reducing GHG emissions and would not exceed San Francisco's applicable GHG emissions threshold of significance. Moreover, the additional use of 1142 Van Ness Avenue would not change the consistency of the original project with the city's GHG Reduction Strategy. As such, the revised project would not result in a significant increase in GHG emissions compared to the GHG emissions analyzed in the Final EIR. No mitigation measures are necessary.

2550 Van Ness Avenue (the Da Vinci Hotel)

The revised project at 2550 Van Ness Avenue would not result in an appreciable increase in GHG emissions, because there would be no exterior changes to the building, and the changes to the interior of the building would be limited to the replacement of hotel furnishings with student furnishings. The revised project at 2550 Van Ness Avenue would be subject to and required to comply with several regulations adopted to reduce GHG emissions as identified in the GHG Reduction Strategy. Regulations applicable to 2550 Van Ness Avenue include the Commuter Benefits Ordinance, the Transportation Sustainability Fee, and the Mandatory Recycling and Composting Ordinance. Consistency of 2250 Van Ness Avenue with the city's GHG Reduction Strategy is demonstrated by the city's Compliance Checklist.[28]

Because the revised project at 2550 Van Ness Avenue would be consistent with the city's GHG Reduction Strategy, it would not conflict with any plans adopted for the purpose of reducing GHG emissions and would not exceed San Francisco's applicable GHG emissions threshold of significance. Moreover, the additional use of 2550 Van Ness Avenue would not change the consistency of the original project with the city's GHG Reduction Strategy. As such, the revised project would not result in a significant increase in GHG emissions compared to the GHG emissions analyzed in the Final EIR. No mitigation measures are necessary.

2801 Leavenworth Street (the Cannery)

The revised project would result in permitting changes at 2801 Leavenworth Street but would involve minimal physical changes to the building. There would be no exterior changes to the building, and the changes to the interior of the building would be limited to the replacement of existing broken, worn out, or unsafe fixtures. There would also be a net decrease in VMT relative to the existing conditions, according to the transportation analysis. As such, there would not be any additional emissions from vehicles associated with 2801 Leavenworth Street. Because the revised project at 2801 Leavenworth Street would not result in additional GHG emissions, it would not conflict with any plans adopted for the purpose of reducing GHG emissions. As such, the revised project would not result in a significant increase in GHG emissions compared to the GHG emissions analyzed in the Final EIR. No mitigation measures are necessary.

2225 Jerrold Avenue

Compared to the original project, the revised project at 2225 Jerrold Avenue would involve minimal changes to the interior of the building and limited exterior modifications related to safe pedestrian and bicycle infrastructure to provide public access to the community amenities on-site. There would be not be a substantial change in VMT relative to existing conditions as the number of vehicle trips would stay the

[28] San Francisco Planning Department, Greenhouse Gas Analysis: Compliance Checklist for 2550 Van Ness Avenue, February 23, 2019.

same under the revised project. As such, there would not be any additional emissions from vehicles associated with 2225 Jerrold Avenue. Because the revised project at 2225 Jerrold Avenue would not result in additional GHG emissions, it would not conflict with any plans adopted for the purpose of reducing GHG emissions. As such, the revised project would not result in a significant increase in GHG emissions compared to the GHG emissions analyzed in the Final EIR. No mitigation measures are necessary.

Conclusion

The revised project would not change any of the Final EIR's findings with respect to greenhouse gas emissions impacts. There is no new information of substantial importance, such as new regulations, a change of circumstances (e.g., physical changes to the environment as compared to 2016), or changes to the project that would give rise to new significant environmental effects. This analysis does not result in any different conclusions than those reached in the Final EIR related to greenhouse gas emissions, either on a project-related or cumulative basis. No mitigation is required.

4.9 Wind and Shadow

The Final EIR determined that the original project would not alter wind in a manner that could substantially affect public areas, nor would it create new shadow in a manner that could substantially affect outdoor recreation facilities or other public areas. No impacts in the study areas or at the project sites were identified. Under the revised project, 1055 Pine Street, 1069 Pine Street, 700 Montgomery Street, 2295 Taylor Street, and 2340 Stockton Street would be vacated by AAU, and no wind or shadow impacts would occur at these sites. Similar to the original project, construction activities under the revised project at 1946 Van Ness Avenue, 1142 Van Ness Avenue, 2550 Van Ness Avenue, and 2801 Leavenworth Street related to changes in use would be limited to tenant improvements, including interior construction, fire sprinkler/alarm upgrades, and/or the addition of exterior signage.

As discussed previously, under the revised project AAU would vacate the six-story building at 1055 Pine Street and the one-story building at 1069 Pine Street. Future uses at 1055 Pine Street and 1069 Pine Street are unknown at this time; however, changes of use and/or physical modifications at both buildings would be subject to all applicable planning and building codes and, if required, appropriate California Environmental Quality Act (CEQA) review at the time such changes (if any) are proposed.

Because the revised project would not involve any new development or additions at these locations that would change the height and bulk of existing structures, it would not alter wind environments, alter shadows, or be subject to the requirements of San Francisco Planning Code section 295 (see discussion below under Wind). Furthermore, any future changes would be required to comply with all applicable policies and regulations, including San Francisco Planning Code section 148, intended to reduce wind impacts, and all applicable policies and regulations intended to reduce shadow impacts. Therefore, as with the original project, the revised project at these locations would not alter wind in a manner that substantially affects public areas and would not create new shadow in a manner that substantially affects outdoor recreation facilities or other public areas; there would be no impacts related to wind and shadow. No mitigation measures are necessary. There would be no new significant impacts related to wind and shadow at any of the project sites. Therefore, the revised project at 1055 Pine Street, 1069 Pine Street, 700 Montgomery Street, 2295 Taylor Street, 2340 Stockton Street, 460 Townsend Street, 1946 Van Ness Avenue, 1142 Van Ness Avenue, 2550 Van Ness Avenue, 168 Bluxome Street, 121 Wisconsin Street, 150 Hayes Street,

121 Wisconsin Street, 2801 Leavenworth Street, and 2225 Jerrold Avenue. would not change the conclusions reached in the Final EIR regarding wind and shadow impacts, and no new mitigation is required.

Conclusion

The revised project would not change any of the Final EIR's findings with respect to wind and shadow impacts. There is no new information of substantial importance, such as new regulations, a change of circumstances (e.g., physical changes to the environment as compared to 2010), or changes to the project that would give rise to new significant environmental effects or a substantial increase in the severity of previously identified significant effects. This analysis does not result in any different conclusions than those reached in the Final EIR related to wind and shadows, either on a project-related or cumulative basis.

4.10 Recreation

The Final EIR determined that the original project would not increase the use of or physically degrade existing recreational facilities such that substantial physical deterioration of those facilities would occur or be accelerated or require construction or expansion of recreational facilities in a way that would adversely affect the environment, resulting in a less-than-significant impact in the study areas and at the project sites. The revised project would be limited to the occupation, change of use, and vacation of existing buildings in already developed areas of the city and would not result in new development or major additions at all locations. Although the recreational facility at 1069 Pine Street would be vacated, AAU students, faculty, and staff would still be able to use other AAU recreational facilities at 620 Sutter Street, 655 Sutter Street, 601 Brannan Street, 1142 Van Ness Avenue and 2225 Jerrold Avenue.[29]

The revised project would result in a net increase of 29 beds, for a total capacity of 1,839 beds, due to the proposed occupation of 2550 Van Ness Avenue by AAU for use as student housing. AAU students at 2550 Van Ness Avenue would have access to existing AAU recreational resources. Further, the new student housing facility at 2550 Van Ness Avenue would be required to meet the open space requirements for student housing, as specified in San Francisco Planning Code section 135. In addition, the revised project proposes new open space, including a basketball half court and a picnic area, at 1727 Lombard Street.

The revised project also could increase the demand for recreational resources around the properties not previously occupied by AAU—1946 Van Ness Avenue and 1142 Van Ness Avenue—due to the additional residents, students, faculty, and staff that the revised project would bring to the area. Conversely, the revised project would result in a decrease in the demand for recreational resources around the properties to be vacated by AAU (1055 Pine Street, 1069 Pine Street, 700 Montgomery Street, 2295 Taylor Street, 150 Hayes Street, 168 Bluxome Street, 460 Townsend Street, 121 Wisconsin Sreet, and 2340 Stockton Street). Conditions and demand for recreational resources at 2801 Leavenworth Street would stay the same under the revised project because the change of use permit would be modified, and the only new uses proposed at the site would be retail uses.

In addition to the increased demand for recreational resources at some locations, the revised project would remove the existing recreational facilities currently provided for AAU students, faculty, and staff at 1069 Pine Street. AAU also facilitates access for students, faculty, and staff at other nearby facilities, as listed in

[29] As discussed on page 4.11-18 in the Final EIR, 2225 Jerrold Avenue would be used on an accessory basis as recreational space for AAU.

Table 4.11-2 of the Final EIR, where practice and game space is provided for various AAU athletic programs.

Despite increases in the demand for recreational use that could occur around some sites under the revised project, and even with the removal of the existing recreational uses at 1069 Pine Street, the demand for recreational uses would be less under the revised project than under the original project due to the substantial decrease in projected AAU enrollment, and the continued availability of recreational resources, both specifically designated for AAU student, faculty and staff, and generally available within the neighborhoods near revised project sites.[30] Therefore, the amount of additional demand for and use of recreational resources under the revised project would be less than under the original project. Further, based on the significant decline in enrollment since 2012, and because the revised project would result in only a gradual increase of net population throughout the project sites, the growth would be less than that analyzed in the Final EIR, and ample recreational facilities would be available for resident, student, faculty and staff use within and immediately adjacent to the project sites. Therefore, the increase in population as a result of the revised project would not result in the degradation or deterioration of existing recreational facilities, or include or result in the need to expand or construct new facilities. Additionally, future occupation and change of use of existing buildings would be required to comply with San Francisco Planning Code sections 135 and 102.36 for open space requirements.

Conclusion

As with the original project, this impact would be less than significant, and no mitigation measures are necessary. There would be no new significant impacts related to recreation at any of the project sites. Therefore, the revised project would not change the conclusions reached in the Final EIR regarding recreation, and no new mitigation is required.

4.11 Utilities and Service Systems

The Final EIR determined that the original project would not require or result in the construction of substantial new water treatment facilities, and the city would have sufficient water supplies available to serve the original project (including growth in the study areas and at the project sites) from existing entitlements and resources. The Final EIR also concluded that the original project would not require new or expanded water supply resources or entitlements, would not require or result in the expansion or construction of new wastewater treatment or stormwater facilities, exceed capacity of the wastewater treatment provider when combined with other commitments, or exceed wastewater treatment requirements of the Regional Water Quality Control Board, and would be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs and would comply with federal, state, and local statutes and regulations related to solid waste, resulting in less-than-significant impacts in the study areas and at the project sites.

The revised project would result in a net increase of 454 square feet of institutional uses and a net increase of approximately 29 beds for student housing, for a total capacity of approximately [1,839] beds as compared to the original project. This increase in institutional and residential use would result in a small

[30] Final EIR Tables 4.11-1 and 4.11-2 provide comprehensive lists of parks and recreational facilities in the vicinity of the 12 study areas and six project sites, including those near the mid Van Ness Avenue 2801 Leavenworth area, and existing athletic facilities used by AAU.

increase in the demand for utilities and service systems around the properties requiring a change of use or construction (1946 Van Ness Avenue, 1142 Van Ness Avenue, and 2550 Van Ness Avenue) due to additional residents, students, faculty, and staff in the area.

However, as previously discussed, under the revised project AAU would vacate the six-story building at 1055 Pine Street and the one-story building at 1069 Pine Street. The 155 beds currently provided at 1055 Pine Street would be relocated to the Da Vinci Hotel at 2550 Van Ness Avenue (see discussion below). The 1069 Pine Street building contains a small gymnasium. This use would be relocated to an existing, similarly-sized gymnasium at 1142 Van Ness Avenue (the site of the former Concordia Club). Accordingly, expanded demand in utilities and service systems associated with vacation of these two properties would not occur. Future uses at 1055 Pine Street and 1069 Pine Street are unknown at this time; however, changes of use and/or physical modifications at both buildings would be subject to all applicable planning and building codes and, if required, appropriate California Environmental Quality Act (CEQA) review at the time such changes (if any) are proposed.

While the revised project would result in an increase in the demand for public services and utilities around some sites that would be occupied by AAU, the revised project would decrease the growth of AAU uses and demand for utilities and service systems around the properties to be vacated (700 Montgomery Street, 2295 Taylor Street, 168 Bluxome Street, 121 Wisconsin Street, 150 Hayes Street, 460 Townsend Street, and 2340 Stockton Street). Demand for utilities and service systems at 2801 Leavenworth Street would remain the same under the revised project because the change of use permit would be modified, and the proposed uses would continue to be ground-floor retail. Similarly, demand for utilities and service systems at 2225 Jerrold Avenue would remain the same under the revised project because the proposed use would continue to be a community recreation facility.

Overall, due to the significant decrease in projected enrollment under the revised project, all potential impacts on utilities and service systems under the revised project would be less than the impacts analyzed in the Final EIR. The Final EIR determined that even with the increase in student, faculty, and staff populations, which would result in an increase in the demand for utilities and service systems, sufficient water supplies would be available to serve the original project; construction of new water, wastewater, or stormwater facilities would not be required; and sufficient landfill capacity would be available to serve the original project. Taking into account reduced growth under the revised project, utilities and service systems would still each have adequate resources and capacity to meet demand and avoid the need for construction of new facilities. As under the original project, the revised project would result in incremental, dispersed growth that could be accommodated without resulting in an adverse effect to utilities and service systems.

Additionally, newly occupied buildings would be required to comply with the San Francisco's Residential Water Conservation Ordinance that would require installation of water conservation equipment (such as low-flow showerheads, faucets, and toilets) prior to making major improvements. AAU would also be required to adhere to the applicable federal, state, and local regulations associated with reduction of construction-related and operational solid waste, including the Mandatory Recycling and Composting Ordinance, which requires everyone in San Francisco to separate their refuse into recyclables, compostables, and trash. With adherence to applicable regulations, the increasing rate of diversion through recycling, composting, and other methods would result in a decreasing share of total waste that would be disposed in the Hay Road Landfill in Solano County. Moreover, all new development projects within the

city are required to comply with applicable requirements of the city's Sustainability Plan, Climate Action Plan, Green Building Ordinances, and Title 24 requirements.

Conclusion

As discussed above in the Project Description, AAU's current and projected enrollment are substantially lower than that predicted in the Final EIR. The revised project would result in a gradual increase of net population throughout the project sites that would be less than what was analyzed in the Final EIR. As such, utility and service systems would still have adequate resources and capacity to meet demand. Therefore, the increase in AAU uses as a result of the revised project would not result in the need for new or expanded utility and service systems, or construction of new facilities. Therefore, the amount of additional demand for and use of utilities and service systems under the revised project would be less than under the original project, which would result in fewer impacts than analyzed in the Final EIR, and as with the original project, this impact would be less than significant. No mitigation measures are necessary. There would be no new significant impacts related to utility and service systems at any of the project sites. Therefore, the revised project would not change the conclusions reached in the Final EIR regarding utility and service systems, and no new mitigation is required.

4.12 Public Services

The Final EIR concluded that the original project would not result in substantial adverse physical impacts associated with the provision of, or the need for, new or physically altered fire or police protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for fire and police protection, would not result in substantial adverse physical impacts associated with the provision of, or the need for, new or physically altered school facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives for schools, and would not result in substantial adverse physical impacts associated with the provision of, or the need for, new or physically altered library facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives for libraries, resulting in less-than-significant impacts in the study areas and at the project sites.

As discussed previously, under the revised project AAU would vacate the six-story building at 1055 Pine Street and the one-story building at 1069 Pine Street. The 155 beds currently provided at 1055 Pine Street would be relocated to the Da Vinci Hotel at 2550 Van Ness Avenue (see discussion below). The 1069 Pine Street building contains a small gymnasium, the use of which would be relocated to an existing, similarly-sized gymnasium at 1142 Van Ness Avenue (the site of the former Concordia Club). Demand for public services near these two properties would decrease with vacation of these two properties. Future uses at 1055 Pine Street and 1069 Pine Street are unknown at this time; however, changes of use and/or physical modifications at both buildings would be subject to all applicable planning and building codes and, if required, appropriate California Environmental Quality Act (CEQA) review at the time such changes (if any) are proposed.

The revised project would result in a net increase of 454 square feet of institutional uses and a net increase of 29 beds for student housing, for a total capacity of approximately 1,839 beds as compared to the original project. This increase in institutional and student housing use could result in a small increase in the demand for public services around the properties requiring a change of use or construction (1946 Van Ness Avenue,

1142 Van Ness Avenue, and 2550 Van Ness Avenue) due to additional residents, students, faculty, and staff in the area.

While the revised project would result in an increase in the demand for public services around some sites that would be occupied by AAU under the revised project, the revised project would decrease the growth of AAU uses and demand for public services around the properties to be vacated (700 Montgomery Street, 2295 Taylor Street, 168 Bluxome Street, 121 Wisconsin Street, 150 Hayes Street, 460 Townsend Street, and 2340 Stockton Street). As discussed above in Section 4.11 Utilities and Service Systems, demand for utilities and service systems at 2801 Leavenworth Street and 2225 Jerrold Avenue would remain the same under the revised project.

Overall, due to the substantial decrease in projected enrollment under the revised project, all potential impacts on public services under the revised project would be less than the impacts analyzed in the Final EIR. The Final EIR determined that even with the increase in student, faculty and staff populations, which would result in an increase in the demand for fire and police protection services, the San Francisco Fire Department and San Francisco Police Department each have adequate resources to meet demand for fire and police protection that would be associated with growth under the original project and construction of new facilities would not be required. Similarly, the San Francisco Unified School District and San Francisco Public Library system have adequate capacity to accommodate growth from the original project. Taking into account less growth under the revised project, the San Francisco Fire Department, San Francisco Police Department, San Francisco Unified School District, and San Francisco Public Library system would still each have adequate resources and capacity to meet demand for fire and police protection, and school and library services, avoiding the need for construction of new facilities. As under the original project, the revised project would result in incremental, dispersed growth that could be accommodated without resulting in an adverse effect to police or fire protection services or school or library services.

Conclusion

Because current enrollment is substantially lower than that predicted in the Final EIR, and the revised project would result in only a gradual increase of net population throughout the project sites, it would be less than what was analyzed in the Final EIR, and public services would still have adequate resources and capacity to meet demand, the increase in population as a result of the revised project would not result in the need for new or expanded public services, or construction of new facilities. Therefore, the amount of additional demand for and use of utilities and service systems under the revised project would be less than under the original project, which would result in fewer impacts than analyzed in the Final EIR, and as with the original project, this impact would be less than significant. No mitigation measures are necessary. There would be no new significant impacts related to public services at any of the project sites. Therefore, the revised project would not change the conclusions reached in the Final EIR regarding public services, and no new mitigation is required.

4.13 Biological Resources

The Final EIR determined that there would be no impact on riparian habitat or other sensitive natural community, federally protected wetlands, conflict with any local policies or ordinances protecting biological resources, or conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. The Final EIR also concluded that the original project would not 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 would not interfere substantially with the movement of any 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, resulting in less-than-significant impacts in the study areas and at the project sites.

As discussed previously, under the revised project AAU would vacate 1055 Pine Street, 1069 Pine Street, 700 Montgomery Street, 2295 Taylor Street, 168 Bluxome Street, 121 Wisconsin Street, 150 Hayes Street, 460 Townsend Street, and 2340 Stockton Street. No activities would occur with the vacation of these properties that would result in a substantial impact to a native resident or migratory fish or wildlife species, or with an established native resident or migratory wildlife corridor. Future uses at 1055 Pine Street and 1069 Pine Street are unknown at this time; however, changes of use and/or physical modifications at both buildings would be subject to all applicable planning and building codes and, if required, appropriate California Environmental Quality Act (CEQA) review at the time such changes (if any) are proposed. In addition, the proposed changes of use at 2801 Leavenworth Street and 2225 Jerrold Avenue would largely occur within the buildings and not result in a substantial impact to native resident or migratory fish or wildlife species, or with an established native resident or migratory wildlife corridor.

Similar to the original project, the revised project is located within highly urbanized areas and does not support or provide habitat for any rare, endangered, or protected wildlife or plant species. Because the study areas are in fully developed urban areas with no natural vegetation communities remaining, the revised project would also not affect any special-status plants. Work at the revised project locations would involve minor (largely interior) alterations and no trees would be removed, thus avoiding disturbance or destruction of nesting habitat for bird species.

Additionally, the revised project would not substantially interfere with the movement of a native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors due to the highly developed and urbanized nature of the project setting. As with the original project, the revised project would utilize existing buildings in all locations and would not increase building heights or result in construction on previously undeveloped sites. The revised project therefore would likely have limited or no impacts on migration patterns or migratory wildlife corridors or increase any bird hazards.

Conclusion

As with the original project, potential impacts to biological resources would be less than significant. No mitigation measures are necessary. There would be no new significant impacts related to biological resources at any of the project sites. Therefore, the revised project would not change the conclusions reached in the Final EIR regarding biological resources, and no new mitigation is required.

4.14 Geology and Soils

The Final EIR determined that the original project would not result in impacts within the study areas or at the project sites related to fault rupture, landslides, erosion and loss of topsoil, wastewater disposal, and change in topography. The Final EIR also concluded that the original project would result in less-than-significant impacts in the study areas or at the project sites related to exposure of people or structures to the risk of loss, injury, or death involving strong seismic ground shaking and seismic-related ground failure

such as liquefaction, geologic or soil units that are unstable, or that could become unstable, and expansive soil.

No excavation would occur for any of the revised project structures. For those buildings which would be subject only to minor alterations, the revised project would result in the same or similar impacts as the original project on geology and soils.

As discussed previously, under the revised project AAU would vacate 1055 Pine Street, 1069 Pine Street, 700 Montgomery Street, 2295 Taylor Street, 168 Bluxome Street, 121 Wisconsin Street, 150 Hayes Street, 460 Townsend Street, and 2340 Stockton Street. No activities that could result in an impact related to geologic hazards would occur with the vacation of these properties. In addition, the proposed changes of use at 2801 Leavenworth Street and 2225 Jerrold Avenue would not result in any geologic hazard impacts beyond the less than significant impacts disclosed in the Final EIR.

In addition, the revised project includes a change of use from tourist hotel/motel to student housing at 2550 Van Ness Avenue, a change of use from retail and light industry to postsecondary educational institution at 1946 Van Ness Avenue, and a change of use from private community facility to postsecondary educational institution at 1142 Van Ness Avenue. Similarly, the changes of use at 2550 Van Ness Avenue, 1946 Van Ness Avenue, and 1142 Van Ness Avenue would not result in impacts related to geologic hazards. Future uses at 1055 Pine Street and 1069 Pine Street are unknown at this time; however, changes of use and/or physical modifications at both buildings would be subject to all applicable San Francisco codes and, if required, appropriate California Environmental Quality Act (CEQA) review at the time such changes (if any) are proposed.

The revised project at all other locations would not expose people or structures to the risk of loss, injury, or death involving strong seismic ground shaking and seismic-related ground failure such as liquefaction, would not be located on geologic or soil units that are unstable, or that could become unstable as a result of the revised project, and would not be located on expansive soil and, therefore, would not create substantial risks to life or property. Impacts would be the same because the project sites under the revised project are within the same geologic units and have the same potential for ground shaking and liquefaction. AAU would be required to ensure that building occupants at facilities it intends to occupy are protected from unstable soil hazards to the extent required under existing San Francisco Building Code regulations as administered by the Department of Building Inspection. The Department of Building Inspection review would address hazards such as liquefaction, lateral spreading, ground failure, and compressible soils. Occupancy permits would not be issued until structural upgrades, as deemed necessary through site-specific investigation, have been implemented; therefore, impacts would be less than significant.

This analysis conservatively assumes that AAU could occupy buildings in areas where artificial fill and/or Bay Mud is present and thus could be located on expansive soils. Therefore, the revised project could create substantial risks to life or property. However, if a permit from the Department of Building Inspection is required prior to AAU's occupancy of a building and the issuance of occupancy permits, AAU would be required to comply with all applicable building code regulations as administered by the Department of Building Inspection. This may include implementation of a site-specific structural survey and Department of Building Inspection permit review, compliance with current building code requirements and the requirements of San Francisco's unreinforced masonry building ordinance (ordinance 225-92, adopted in 1992) and Soft Story Program.

Conclusion

Compliance with these regulations would avoid or minimize adverse effects associated with expansive soils in the study areas, and like the original project, this impact would be less than significant. No mitigation measures are necessary. There would be no new significant impacts related to geology and soils at any of the project sites. Therefore, the revised project would not change the conclusions reached in the Final EIR regarding geology and soils, and no new mitigation is required.

4.15 Hydrology and Water Quality

The Final EIR determined that there would be no impacts within the study areas or at the project sites related to deletion of groundwater supplies/interference with groundwater recharge, alteration of drainage patterns, failure of a dam or levee, seiche and mudflows, or placing housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other authoritative flood hazard delineation map, or placing within a 100-year flood hazard area structures that would impede or redirect flood flows. The Final EIR also determined the original project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade water quality, would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on site or off site, or create or contribute runoff water that would exceed the capacity of existing or planned storm sewer systems or provide substantial additional sources of polluted runoff and would not expose people or structures to inundation by tsunami, resulting in less-than-significant impacts in the study areas and at the project sites.

The revised project would result in the same impacts as described under the original project. The revised project would result in the change of use of certain buildings, withdrawal of change of use permits, and vacation of existing buildings. Due to these changes in use, there would be modest changes in wastewater flows. However, the revised project would not result in substantial increases in wastewater and stormwater generation beyond that which is associated with projected population growth, and revised project flows would be accommodated by existing wastewater treatment facilities and improvements identified in the San Francisco Public Utilities Commission Sewer System Improvement Project.[31] Further, the projected AAU enrollment in the Final EIR was significantly greater than what has actually occurred; as such, wastewater generation would be reduced under the revised project as compared to the original project analyzed in the Final EIR.

The wastewater flows would continue to flow into the city's combined stormwater and sewer system and would continue to be treated to the standards contained in the city's National Pollutant Discharge Elimination System permit for the Southeast Water Pollution Control Plant or the National Pollutant Discharge Elimination System permit for the North Point Water Pollution Control Plant, depending on the location of the project site. Therefore, project stormwater flows can be accommodated with little, if any, change in wastewater characteristics, the contribution of those flows from the project sites would have little, if any, effect on the quality of wastewater treated at and discharged from the city's permitted

[31] The public utilities commission sewer system improvement project is a 20-year, 6.9-billion-dollar citywide program to upgrade the city's aging sewer system infrastructure to ensure a reliable and seismically safe system. More about the project may be found here: http://sfwater.org/index.aspx?page=116. Accessed March 30, 2018.

combined sewer system facilities. Therefore, the revised project would not cause water quality violations or water quality degradation.

Additionally, none of the proposed tenant improvements at the project sites would involve activities that meet the criteria for the National Pollutant Discharge Elimination System General Permit for Discharges of Stormwater Associated with Construction Activities and/or the city's Stormwater Management Ordinance. Because there would be limited or no new runoff containing additional pollutants, and the revised project would be required to comply with applicable wastewater and water quality requirements, the potential for violations of water quality standards or degradation of water quality as a result of activities at the project sites would be negligible. Therefore, the revised project would not cause any violations of water quality standards or waste discharge requirements, or otherwise degrade water quality, and this impact would be less than significant.

Regarding increases in stormwater runoff, the revised project is limited to interior tenant improvements and exterior construction activities such as removing or changing signage and minor renovations, which would not substantially change the amount of impervious surfaces at any of the project sites. Therefore, the revised project would not generate additional stormwater flows. The revised project would not substantially alter the existing drainage pattern of the site or area or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on site or off site, or create or contribute runoff water that would exceed the capacity of existing or planned storm sewer systems or provide substantial additional sources of polluted runoff, and this impact would be less than significant.

None of the project sites evaluated in this addendum are within a potential flood hazard area and only 2801 Leavenworth Street could be susceptible to sea level rise by end-of-century (2100) according to BCDC forecast scenarios for sea level rise, although no housing is proposed at this location. Therefore, the revised project would not place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other authoritative flood hazard delineation map, or place within a 100-year flood hazard area structures that would impede or redirect flood flows, and no impact would occur.

The only site evaluated in this addendum with the potential to expose people or structures to inundation by tsunami is 2801 Leavenworth Street; all other sites have no potential for impact. 2801 Leavenworth Street could be susceptible to tsunami run-up of up to approximately 10 feet. The building could be susceptible to damage, which could pose a safety risk to occupants and visitors. Under the revised project, AAU would modify the application to retain retail or other active ground floor uses that would be physically accessible to members of the public during the normal retail hours of operation customary in the neighborhood. This change would not involve modifications to the building's structural components. As such, the revised project would not change how the building could perform if a tsunami were to reach the building. However, if a tsunami were to occur, this could expose building occupants or visitors to risk of injury or death. The city has developed tsunami response procedures through its Emergency Response Plan: Tsunami Annex and its Emergency Operations Plan, which would be implemented in the event of a tsunami to help minimize losses. In addition, AAU has a campus safety plan that addresses emergency evacuation procedures and is intended to reduce the possibility of death and injury to members of the campus community, which would cover all AAU campus property including 2801 Leavenworth Street. Therefore, the revised project at 2801 Leavenworth Street would not expose people or structures to inundation by tsunami, and this impact would be less than significant.

Therefore, as with the original project, all impacts related to hydrology and water quality would be either no impact or less than significant. No mitigation measures are necessary. There would be no new significant impacts related to hydrology and water quality at any of the project sites. Therefore, the revised project would not change the conclusions reached in the Final EIR regarding hydrology and water quality, and no new mitigation is required.

4.16 Hazards and Hazardous Materials

The Final EIR concluded that the original project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, would not expose the public or the environment to unacceptable levels of known or newly discovered hazardous materials as a result of a site being located on a hazardous materials list site, and would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan, resulting in less-than-significant impacts within the study areas and at the project sites. The Final EIR determined that the original project could create a potentially significant hazard to the public or the environment within the study areas and at the project sites through reasonably foreseeable upset and accident conditions involving the release of hazardous building materials into the environment, including within 0.25 mile of a school. However, with implementation of Mitigation Measure M-HZ-2.1 (Testing and Removal of Hazardous Building Materials), this impact would be less than significant. The revised project would not change any of these findings, as further discussed below.

1055 Pine Street, 1069 Pine Street, 700 Montgomery Street, 2295 Taylor Street, 2340 Stockton Street, 168 Bluxome Street, 150 Hayes Street, 460 Townsend Street and 121 Wisconsin Street

Under the revised project, AAU would vacate these properties. Any future changes of use, tenant improvements, or building occupancy would be subject to separate CEQA review. Therefore, there would no impacts related to hazards and hazardous materials at 1055 Pine Street, 1069 Pine Street, 700 Montgomery Street, 2295 Taylor Street, 2340 Stockton Street, 168 Bluxome Street, 150 Hayes Street, 460 Townsend Street and 121 Wisconsin Street and no mitigation measures are necessary. There would be no new significant impacts related to hazards and hazardous materials at these project sites. Therefore, the revised project would not change the conclusions reached in the Final EIR regarding hazards and hazardous materials, and no new mitigation is required.

1946 Van Ness Avenue (the Bakery)

Routine Transport, Use, or Disposal of Hazardous Materials

As part of the revised project, AAU proposes to convert 1946 Van Ness Avenue to a post-secondary educational institutional use. Tenant improvements could use materials such as drywall, paint and related finish work materials, and welding products, some of which contain products that are considered hazardous materials. Due to the limited types and amounts of products that would be used during tenant improvements, and given that such use would be temporary and required to comply with applicable law, renovation activities would not pose a substantial hazard, such that a significant impact would occur.

1946 Van Ness Avenue would also use common types of hazardous materials, such as cleaners, water-based paint, disinfectants, and chemical agents required to maintain the sanitation of the site. AAU proposes to utilize 1946 Van Ness Avenue for its auto restoration and industrial design programs, which may involve the use of materials such as paints, lacquers and solvents, plasters, photographic chemicals,

and ceramic materials, some of which would be regulated as hazardous materials, and would generate hazardous waste. These commercial products are labeled to inform users of potential risks and to instruct them in appropriate handling and disposal procedures. Hazardous waste is hauled away by licensed hazardous waste haulers.

1946 Van Ness Avenue would be required to receive a Hazardous Materials Unified Program Agency (HMUPA) certificate of registration. Hazardous materials use at 1946 Van Ness Avenue would be subject to the certification and Hazardous Materials Business Plan (HMBP) requirements under San Francisco Health Code Article 21. Hazardous waste management would also be regulated by San Francisco Health Code Article 22. As described above, tenant improvements would involve limited and temporary use of hazardous materials that would also be required to comply with applicable law. Therefore, the revised project at 1946 Van Ness Avenue would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, and this impact would be less than significant. No mitigation measures are necessary. There would be no new significant impacts related to the routine transport, use, or disposal of hazardous materials. Therefore, the revised project would not change the conclusions reached in the Final EIR regarding the routine transport, use, or disposal of hazardous materials, and no new mitigation is required.

Reasonably Foreseeable Upset and Accident Conditions

Interior and exterior tenant improvements could involve handling or removing nonstructural elements such as insulation, flooring, ceilings, paint, lighting fixtures, and electrical equipment. Some of these nonstructural features could contain ACMs (e.g., old fireproofing and flooring materials), lead-based paint (LBP), or PCBs (e.g., in electrical equipment and lighting fixtures), particularly if the work is being done in older buildings, unless previous renovations have removed those materials or other protective measures have been implemented. A potential upset and accident condition involving the release of hazardous materials into the environment could occur if renovation debris contains those materials at levels that require special handling and their removal and disposal is not properly managed.

The removal of any ACM and LBP would be managed through compliance with air quality district and DBI permitting procedures, which would require testing and, if necessary, abatement. Abatement, if necessary, would occur in conjunction with issuance of building permits for tenant improvements and compliance with the established regulatory framework would reduce the impacts on less than significant. However, if fixtures containing PCBs, DEHP, or mercury are present and are removed and improperly disposed, this could result in upset or accident conditions, including to schools within 0.25 mile of the revised project, which would be a significant impact. Implementation of Mitigation Measure M-HZ-2.1 – Testing and Removal of Hazardous Building Materials, would reduce the impact of the revised project at 1946 Van Ness Avenue to a less-than-significant level. There would be no new significant impacts related to upset or accident conditions. Therefore, the revised project would not change the conclusions reached in the Final EIR regarding upset or accident conditions, and no new mitigation is required.

Hazardous Materials List Site

1946 Van Ness Avenue is not included on the Cortese List; however, it is located within an area subject to Article 22A, the Maher Ordinance, indicating it is known or suspected to contain contaminated soils and/or groundwater. Minor interior and exterior tenant improvements to the base building core and shell to bring the building into compliance with current life safety codes and exterior rehabilitation of the building would

be required at the site. The revised project is not proposing work that would result in ground disturbance that could disturb soil or groundwater contamination. Thus, the revised project at 1946 Van Ness Avenue would not result in a significant hazard to the public or environment from contaminated soil or groundwater, and the revised project would result in a less-than-significant impact. No mitigation is required. There would be no new significant impacts related to significant hazards to the public or environment. Therefore, the revised project would not change the conclusions reached in the Final EIR regarding significant hazard to the public or environment, and no new mitigation is required.

Emergency Response Plan or Emergency Evacuation Plan

AAU interior and exterior tenant improvements at 1946 Van Ness Avenue would generally be within building interiors or to install exterior improvements such as signage or rehabilitation of the building, which would not require detours for vehicles or pedestrians. Therefore, construction of AAU tenant improvements would neither impair implementation of nor physically interfere with an adopted emergency response or evacuation plan.

The revised project at 1946 Van Ness Avenue would not cause intersection levels of service to deteriorate or cause increased delays (see Section 4.5, Transportation and Circulation). Therefore, the revised project at 1946 Van Ness Avenue would not increase congestion such that implementation of the city's emergency response plan would be affected and impacts on emergency response would be less than significant. No mitigation is required. There would be no new significant impacts on emergency response. Therefore, the revised project would not change the conclusions reached in the Final EIR regarding impacts on emergency response, and no new mitigation is required.

1142 Van Ness Avenue (the Concordia Club)

Routine Transport, Use, or Disposal of Hazardous Materials

As part of the revised project, AAU proposes to convert 1142 Van Ness to a post-secondary educational institutional use. No interior improvements are proposed, as the current configuration supports educational, office, and as-needed event hosting space. 1142 Van Ness Avenue would use common types of hazardous materials, such as cleaners, water-based paint, disinfectants, and chemical agents required to maintain the sanitation of the site. AAU proposes to utilize 1142 Van Ness Avenue for its fashion program, which may involve the use of materials such as paints, lacquers and solvents, plasters, photographic chemicals, and ceramic materials, some of which would be regulated as hazardous materials, and would generate hazardous waste. These commercial products are labeled to inform users of potential risks and to instruct them in appropriate handling and disposal procedures. Hazardous waste is hauled away by licensed hazardous waste haulers.

1142 Van Ness Avenue would be required to receive an HMUPA certificate of registration. Hazardous materials use at 1142 Van Ness Avenue would be subject to the certification and HMBP requirements under SFHC Article 21. Hazardous waste management would also be regulated by SFHC Article 22. As described above, tenant improvements would involve limited and temporary use of hazardous materials that would also be required to comply with applicable law. Therefore, the revised project at 1142 Van Ness Avenue would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, and this impact would be less than significant. No mitigation measures are necessary. There would be no new significant impacts related to the routine transport, use, or disposal of hazardous materials. Therefore, the revised project would not change the conclusions reached in the

Final EIR regarding the routine transport, use, or disposal of hazardous materials, and no new mitigation is required.

Reasonably Foreseeable Upset and Accident Conditions

Because no tenant improvements would occur at 1142 Van Ness Avenue, no potential upset and accident condition involving the release of hazardous materials into the environment could occur. No mitigation measures are necessary. There would be no new significant impacts related to upset or accident conditions. Therefore, the revised project would not change the conclusions reached in the Final EIR regarding upset or accident conditions, and no new mitigation is required.

Hazardous Materials List Site

1142 Van Ness Avenue is not included on the Cortese List; however, it is partially located within an area subject to Article 22A, the Maher Ordinance, indicating it is known or suspected to contain contaminated soils and/or groundwater. However, no physical improvements are proposed at 1142 Van Ness Avenue for the change of use, as the current configuration supports educational, office, and as-needed event hosting space. The revised project is not proposing work that would result in ground disturbance that could disturb soil or groundwater contamination. Thus, the revised project at 1142 Van Ness Avenue would not result in a significant hazard to the public or environment from contaminated soil or groundwater, and the revised project would result in a less-than-significant impact. No mitigation is required. There would be no new significant impacts related to significant hazards to the public or environment. Therefore, the revised project would not change the conclusions reached in the Final EIR regarding significant hazard to the public or environment, and no new mitigation is required.

Emergency Response Plan or Emergency Evacuation Plan

There would be no tenant improvements at 1142 Van Ness Avenue, avoiding the need for detours for vehicles or pedestrians. Therefore, the change of use at 1142 Van Ness Avenue would neither impair implementation of nor physically interfere with an adopted emergency response or evacuation plan.

The revised project at 1142 Van Ness Avenue would not cause intersection levels of service to deteriorate or cause increased delays (see Section 4.5, Transportation and Circulation). Therefore, the revised project at 1142 Van Ness Avenue would not increase congestion such that implementation of the city's emergency response plan would be affected, and impacts on emergency response would be less than significant. No mitigation is required. There would be no new significant impacts on emergency response. Therefore, the revised project would not change the conclusions reached in the Final EIR regarding impacts on emergency response, and no new mitigation is required.

2550 Van Ness Avenue (the Da Vinci Hotel)

Routine Transport, Use, or Disposal of Hazardous Materials

Under the revised project, AAU proposes to use all 136 of the hotel rooms (approximately 306 beds) as student housing, including replacement housing for students vacated from the 155 beds at 1055 Pine Street. The only interior changes at the property would be replacing hotel furnishings with student dormitory furnishings. The project site would use common types of hazardous materials, such as cleaners, disinfectants, and chemical agents required to maintain the sanitation of the site. These commercial products are labeled to inform users of potential risks and to instruct them in appropriate handling and

disposal procedures. In addition, hazardous waste such as light bulbs would be collected at this site, and hauled away regularly by licensed hazardous waste haulers.

The proposed uses would not require an HMUPA certificate for the project site. If there is an increase in the quantities of hazardous materials stored that would exceed the quantities triggering HMBP requirements, AAU would be required to obtain an HMUPA certificate, as required by SFHC Article 21. Even if the project site does not require a HMBP, under SFHC Article 22, if hazardous waste would be generated, AAU would be required to obtain any necessary registrations, which would be determined in consultation with the San Francisco Department of Public Health. There would be no changes to the existing above ground storage tank (AST) and the AST would be maintained in compliance with SFHC Article 21. Therefore, the revised project at 2550 Van Ness Avenue would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, and this impact would be less than significant. No mitigation measures are necessary. There would be no new significant impacts related to the routine transport, use, or disposal of hazardous materials. Therefore, the revised project would not change the conclusions reached in the Final EIR regarding the routine transport, use, or disposal of hazardous materials, and no new mitigation is required.

Reasonably Foreseeable Upset and Accident Conditions

Because only minor tenant improvements associated with replacing hotel furnishings with student dormitory furnishings would occur at 2550 Van Ness Avenue, no potential upset and accident condition involving the release of hazardous materials into the environment could occur. No mitigation measures are necessary. There would be no new significant impacts related to upset or accident conditions. Therefore, the revised project would not change the conclusions reached in the Final EIR regarding upset or accident conditions, and no new mitigation is required.

Hazardous Materials List Site

2550 Van Ness Avenue is not included on the Cortese List; however, it is located within an area subject to Article 22A, the Maher Ordinance. Only minor interior improvements associated with replacing hotel furnishings with student dormitory furnishings would occur at the site. The revised project is not proposing work that would result in ground disturbance that could disturb soil or groundwater contamination. Thus, the revised project at 2550 Van Ness Avenue would not result in a significant hazard to the public or environment from contaminated soil or groundwater, and the revised project would result in a less-than-significant impact. No mitigation is required. There would be no new significant impacts related to significant hazards to the public or environment. Therefore, the revised project would not change the conclusions reached in the Final EIR regarding significant hazard to the public or environment, and no new mitigation is required.

Emergency Response Plan or Emergency Evacuation Plan

Only minor tenant improvements associated with replacing hotel furnishings with student dormitory furnishings would occur at 2550 Van Ness Avenue, avoiding the need for detours for vehicles or pedestrians. Therefore, the change of use at 2550 Van Ness Avenue would neither impair implementation of nor physically interfere with an adopted emergency response or evacuation plan.

The revised project at 2550 Van Ness Avenue would not cause intersection levels of service to deteriorate or cause increased delays (see Section 4.5, Transportation and Circulation). Therefore, the revised project

at 2550 Van Ness Avenue would not increase congestion such that implementation of the city's emergency response plan would be affected, and impacts on emergency response would be less than significant. No mitigation is required. There would be no new significant impacts on emergency response. Therefore, the revised project would not change the conclusions reached in the Final EIR regarding impacts on emergency response, and no new mitigation is required.

2801 Leavenworth Street (the Cannery) and 2225 Jerrold Avenue

Routine Transport, Use, or Disposal of Hazardous Materials

As part of the revised project, AAU would modify the application for 2801 Leavenworth Street to retain retail or other active ground floor uses that would be physically accessible to members of the public during the normal retail hours of operation customary in the neighborhood. Uses may include AAU galleries, and limiting other uses to the mezzanine, second and third floors of the building. The project site would use common types of hazardous materials, such as cleaners, water-based paint, disinfectants, and chemical agents required to maintain the sanitation of the site. These commercial products are labeled to inform users of potential risks and to instruct them in appropriate handling and disposal procedures. Hazardous waste is hauled away by licensed hazardous waste haulers.

As part of the revised project, AAU would modify the application for 2225 Jerrold Avenue to replace the initially proposed AAU recreational facilities with an approximately 15,084 square foot community facility, including a multi-purpose recreation room and indoor and outdoor community facility lounge spaces. AAU would be permitted to use the facility on an accessory basis, subject to regulation under the Development Agreement. The revised project includes modifications to the Jerrold frontage of the property to enhance pedestrian and bicycle access and amenities for the community facility uses in the building. The project site would use common types of hazardous materials such as cleaners, disinfectants, and chemical agents required to maintain the sanitation of the site.

The Final EIR concluded that 2801 Leavenworth Street and 2225 Jerrold Avenue would be required to receive respective HMUPA certificates of registration and will be subject to the certification and HMBP requirements under SFHC Article 21, and SFHC Article 22. These regulations would still apply under the revised project. Therefore, the revised project at 2801 Leavenworth Street and 2225 Jerrold Avenue would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, and this impact would be less than significant. No mitigation measures are necessary. There would be no new significant impacts related to the routine transport, use, or disposal of hazardous materials. Therefore, the revised project would not change the conclusions reached in the Final EIR regarding the routine transport, use, or disposal of hazardous materials, and no new mitigation is required.

Reasonably Foreseeable Upset and Accident Conditions

Minor interior improvements associated with modifying the permit application could cause upset and accident conditions because ACM and LBP are present at the project site. The removal of any ACM and LBP would be managed through compliance with air quality district and DBI permitting procedures, which would require testing and, if necessary, abatement. Abatement, if necessary, would occur in conjunction with issuance of building permits for tenant improvements and compliance with the established regulatory framework would reduce the impacts to less than significant. However, if fixtures containing PCBs, DEHP, or mercury are present and are removed and improperly disposed, this could result in upset or accident

conditions, including to schools within 0.25 mile of the project site, which would be a significant impact. Implementation of Final EIR Mitigation Measure M-HZ-2.1 – Testing and Removal of Hazardous Building Materials, would reduce the impact of the revised project at 2801 Leavenworth Street and 2225 Jerrold Avenue to a less-than-significant level. There would be no new significant impacts related to upset or accident conditions. Therefore, the revised project would not change the conclusions reached in the Final EIR regarding upset or accident conditions, and no new mitigation is required.

Hazardous Materials List Site

2801 Leavenworth Street and 2225 Jerrold Avenue are not included on the Cortese List; however, both project sites are located within an area subject to Article 22A, the Maher Ordinance. At 2801 Leavenworth Street, only minor interior improvements associated with modifying the permit application would occur at the site. The revised project at 2801 Leavenworth Street is not proposing work that would result in ground disturbance that could disturb soil or groundwater contamination. At 2225 Jerrold Avenue, the revised project consists of interior work and ground-level enhancements on the Jerrold property frontage. The revised project would not include work that would result in ground disturbance that could disturb soil or groundwater contamination; however, if work would be required prior to receiving a change of use permit that would result in ground disturbance, that work would be subject to Article 22A, the Maher Ordinance.

Thus, the revised project at 2801 Leavenworth Street and 2225 Jerrold Avenue would not result in a significant hazard to the public or environment from contaminated soil or groundwater, and the revised project would result in a less-than-significant impact. No mitigation is required. There would be no new significant impacts related to significant hazards to the public or environment. Therefore, the revised project would not change the conclusions reached in the Final EIR regarding significant hazard to the public or environment, and no new mitigation is required.

Emergency Response Plan or Emergency Evacuation Plan

AAU tenant improvements at 2801 Leavenworth Street and 2225 Jerrold Avenue would generally be within building interiors or to install exterior improvements such as signage, which would not require detours for vehicles or pedestrians. Therefore, construction of AAU tenant improvements would neither impair implementation of nor physically interfere with an adopted emergency response or evacuation plan.

The revised project at 2801 Leavenworth Street and 2225 Jerrold Avenue would not cause intersection levels of service to deteriorate or cause increased delays (see Section 4.5, Transportation and Circulation). Therefore, the revised project at 2801 Leavenworth Street and 2225 Jerrold Avenue would not increase congestion such that implementation of the city's emergency response plan would be affected, and impacts on emergency response would be less than significant. No mitigation is required. There would be no new significant impacts on emergency response. Therefore, the revised project would not change the conclusions reached in the Final EIR regarding impacts on emergency response, and no new mitigation is required.

Conclusion

The revised project would not change any of the Final EIR's findings with respect to hazards and hazardous materials impacts. There is no new information of substantial importance, such as new regulations, a change of circumstances (e.g., physical changes to the environment as compared to 2016), or changes to the project that would give rise to new significant environmental effects or a substantial increase in the severity

of previously identified significant effects. This analysis does not result in any different conclusions than those reached in the EIR related to hazards and hazardous materials, either on a project-related or cumulative basis. No mitigation measures are required.

4.17 Mineral and Energy Resources

The Final EIR found that the original project would not encourage activities within the study areas or at the project sites that would result in the use of large amounts of fuel, water, or energy, or use these in a wasteful manner. As with the original project, the revised project would have no impact on mineral resources because the sites are not a designated area of significant mineral deposits or locally important mineral resource recovery sites. There would be no new significant impacts related to mineral resources under the revised project.

The revised project involves the vacation of use at nine properties, three new properties, and changes of use of two properties. As discussed previously, under the revised project AAU would vacate the six-story building at 1055 Pine Street and the one-story building at 1069 Pine Street. The 155 beds currently provided at 1055 Pine Street would be relocated to the Da Vinci Hotel at 2550 Van Ness Avenue (see discussion below). The 1069 Pine Street building contains a small gymnasium, the use of which would be relocated to an existing, similarly-sized gymnasium at 1142 Van Ness Avenue (the site of the former Concordia Club). Vacation of these two properties would not involve activities that would use large amounts of fuel, water, or energy, or use these in a wasteful manner. Future uses at 1055 Pine Street and 1069 Pine Street are unknown at this time; however, changes of use and/or physical modifications at both buildings would be subject to all applicable planning and building codes and, if required, appropriate California Environmental Quality Act (CEQA) review at the time such changes (if any) are proposed.

AAU's use of existing buildings would result in an increase in water, fuel, and energy use under the assumption that the buildings were vacant prior to AAU's occupancy. However, AAU's compliance with the city's Commuter Benefits Ordinance, Emergency Ride Home Program, Energy Performance Ordinance, Light Pollution Reduction Ordinance, and other requirements would reduce fuel and energy consumption associated with AAU uses. Additionally, the revised project would make use of existing shuttles along Van Ness Avenue to serve 1946 Van Ness Avenue, 1142 Van Ness Avenue, and 2550 Van Ness Avenue, avoiding a substantial increase in transit trips and fuel.

Therefore, similar to the original project, the revised project would not result in the use of large amounts of fuel, water, or energy, or use these in a wasteful manner, and this impact would be less than significant. No mitigation measures are necessary. There would be no new significant impacts related to energy resources. Therefore, the revised project would not change the conclusions reached in the Final EIR regarding mineral and energy resources, and no new mitigation is required.

4.18 Agricultural and Forest Resources

Similar to the original project, the revised project would have no impact on agriculture and forest resources, because the project sites are located in various urban, developed locations of San Francisco and are not zoned for agriculture, nor are they zoned as forest or timberland. There would be no new significant impacts related to agriculture and forest resources. Therefore, the revised project would not change the conclusions reached in the Final EIR regarding agriculture and forest resources, and no new mitigation is required.

5.0 MITIGATION MEASURES

Mitigation measures established in the Final EIR that would still apply to the revised project are presented below.

Noise

Mitigation Measure M-NO-2.1c – Siting of Noise-Generating Equipment. If AAU proposes, as part of a change of use new (as opposed to replacement) mechanical equipment or ventilation units that would be expected, to increase ambient to noise levels by 5 dBA or more, either short-term, at nighttime, or as 24-hour average, in the proposed Project site vicinity, the San Francisco Planning Department shall require the preparation of an analysis that includes, at a minimum, a site survey to identify potential noise-sensitive uses (primarily, residences, and also including schools and child care, religious, and convalescent facilities and the like) within 900 feet of, and that have a direct line-of-sight to, the project site, and at least one 24-hour noise measurement (with average and maximum noise level readings taken so as to be able to accurately describe maximum levels reached during nighttime hours), prior to the first project approval action. The analysis shall be conducted prior to issuance of a building permit. The analysis shall be prepared by persons qualified in acoustical analysis and/or engineering and shall demonstrate with reasonable certainty that the proposed equipment would not cause a conflict with the use compatibility requirements in the *San Francisco General Plan* and would not violate Noise Ordinance Section 2909. If necessary to meet these standards, the proposed equipment shall be replaced with quieter equipment, deleted entirely, or mitigated through implementation of site-specific noise reduction features or strategies.

Air Quality

Mitigation Measure M-AQ-2.1 – Construction Emissions Minimization within an Air Pollution Exposure Zone. This mitigation measure is applicable to renovation activities occurring within an Air Pollution Exposure Zone and where off-road diesel-powered equipment is required and would operate for more than 20 total hours over the duration of construction at any one site.

A. *Construction Emissions Minimization Plan.* Prior to issuance of a construction permit, the project sponsor shall submit a Construction Emissions Minimization Plan (Plan) to the Environmental Review Officer (ERO) for review and approval by an Environmental Planning Air Quality Specialist. The Plan shall detail project compliance with the following requirements:

1. All off-road equipment greater than 25 hp and operating for more than 20 total hours over the entire duration of construction activities shall meet the following requirements:

a) Where access to alternative sources of power is available, portable diesel engines shall be prohibited.

b) All off-road equipment shall have:

i. Engines that meet or exceed either U.S. Environmental Protection Agency (USEPA) or California Air Resources Board (ARB) Tier 2 off-road emission standards, and

ii. Engines that are retrofitted with an ARB Level 3 Verified Diesel Emissions Control Strategy (VDECS).[32]

c) Exceptions:

i. Exceptions to A(1)(a) may be granted if the project sponsor has submitted information providing evidence to the satisfaction of the ERO that an alternative source of power is limited or infeasible at the project site and that the requirements of this exception provision apply. Under this circumstance, the sponsor shall submit documentation of compliance with A(1)(b) for on-site power generation.

ii. Exceptions to A(1)(b)(ii) *may* be granted if the project sponsor has submitted information providing evidence to the satisfaction of the ERO that a particular piece of off-road equipment with an ARB Level 3 VDECS is (1) technically not feasible, (2) would not produce desired emissions reductions due to expected operating modes, (3) installing the control device would create a safety hazard or impaired visibility for the operator, or (4) there is a compelling emergency need to use off-road equipment that are not retrofitted with an ARB Level 3 VDECS and the sponsor has submitted documentation to the ERO that the requirements of this exception provision apply. If granted an exception to A(1)(b)(ii), the project sponsor must comply with the requirements of A(1)(c)(iii).

iii. If an exception is granted pursuant to A(1)(c)(ii), the project sponsor shall provide the next cleanest piece of off-road equipment as provided by the step down schedules in Table 5-1, Off-Road Equipment Compliance Step-Down Schedule.

Table 5-1 Off-Road Equipment Compliance Step-Down Schedule

Compliance Alternative	*Engine Emission Standard*	*Emissions Control*
1	Tier 2	ARB Level 2 VDECS
2	Tier 2	ARB Level 1 VDECS
3	Tier 2	Alternative Fuel*

How to use the table: If the requirements of (A)(1)(b) cannot be met, then the project sponsor would need to meet Compliance Alternative 1. Should the project sponsor not be able to supply off-road equipment meeting Compliance Alternative 1, then Compliance Alternative 2 would need to be met. Should the project sponsor not be able to supply off-road equipment meeting Compliance Alternative 2, then Compliance Alternative 3 would need to be met.

* Alternative fuels are not a VDECS.

[32] Equipment with engines meeting Tier 4 Interim or Tier 4 Final emission standards automatically meet this requirement, therefore a VDECS would not be required.

2. The project sponsor shall require the idling time for off-road and on-road equipment be limited to no more than two minutes, except as provided in exceptions to the applicable state regulations regarding idling for off-road and on-road equipment. Legible and visible signs shall be posted in multiple languages (English, Spanish, and Chinese) in designated queuing areas and at the construction site to remind operators of the two minute idling limit.

3. The project sponsor shall require that construction operators properly maintain and tune equipment in accordance with manufacturer specifications.

4. The Plan shall include estimates of the construction timeline by phase with a description of each piece of off-road equipment required for every construction phase. Off-road equipment descriptions and information may include, but is not limited to: equipment type, equipment manufacturer, equipment identification number, engine model year, engine certification (Tier rating), horsepower, engine serial number, and expected fuel usage and hours of operation. For VDECS installed: technology type, serial number, make, model, manufacturer, ARB verification number level, and installation date and hour meter reading on installation date. For off-road equipment using alternative fuels, reporting shall indicate the type of alternative fuel being used.

5. The Plan shall be kept on-site and available for review by any persons requesting it and a legible sign shall be posted at the perimeter of the construction site indicating to the public the basic requirements of the Plan and a way to request a copy of the Plan. The project sponsor shall provide copies of Plan to members of the public as requested.

B. *Reporting.* Monthly reports shall be submitted to the ERO indicating the construction phase and off-road equipment information used during each phase including the information required in A(4). In addition, for off-road equipment using alternative fuels, reporting shall include the actual amount of alternative fuel used.

Within six months of the completion of construction activities, the project sponsor shall submit to the ERO a final report summarizing construction activities. The final report shall indicate the start and end dates and duration of each construction phase. For each phase, the report shall include detailed information required in A(4). In addition, for off-road equipment using alternative fuels, reporting shall include the actual amount of alternative fuel used.

C. *Certification Statement and On-Site Requirements.* Prior to the commencement of construction activities, the project sponsor must certify (1) compliance with the Plan and (2) all applicable requirements of the Plan have been incorporated into contract specifications.

Mitigation Measure M-AQ-3.3 – Maximum Daily Construction Activities. Construction activities shall be limited to the renovation (including architectural coating) of a maximum of 100,000 square feet of building space at a time.

Mitigation Measure M-AQ-4.1a – Best Available Control Technology for Diesel Generators. All new (i.e., not replacement) diesel generators shall have engines that (1) meet Tier 4 Final or Tier 4

Interim emission standards, or (2) meet Tier 2 emission standards and are equipped with a California Air Resources Board (ARB) Level 3 Verified Diesel Emissions Control Strategy (VDECS).

Mitigation Measure M-AQ-4.1b – Best Available Control Technology for Boilers. All new (i.e., not replacement) boilers shall be natural gas operated. If infeasible, all boilers shall be equipped with Best Available Control Technologies, such as fuel gas filters, or baghouse or electrostatic precipitators. BACTs shall be approved by BAAQMD through the permitting process.

Hazards and Hazardous Materials

Mitigation Measure M-HZ-2.1 – Testing and Removal of Hazardous Building Materials. AAU shall ensure that for any existing building where tenant improvements are planned, the building is surveyed for hazardous building materials including PCB-containing electrical equipment, fluorescent light ballasts containing PCBs or DEHP, and fluorescent light tubes containing mercury vapors. The results of testing shall be provided to DBI. The materials not meeting regulatory standards shall be removed and properly disposed of prior to the start of tenant improvements for buildings in the study areas. Old light ballasts that are removed during renovation shall be evaluated for the presence of PCBs. In the case where the presence of PCBs in the light ballast cannot be verified, the light ballast shall be assumed to contain PCBs and handled and disposed of as such, according to applicable laws and regulations. Any other hazardous building materials identified either before or during demolition or renovation shall be abated according to federal, state, and local laws and regulations.

6.0 CONCLUSION

Based on the foregoing, it is concluded that the analyses conducted and the conclusions reached in the Final EIR certified on July 28, 2016 remain valid. The proposed revisions to the project would not cause new significant impacts not identified in the Final EIR, and no new mitigation measures would be necessary to reduce significant impacts. No changes have occurred with respect to circumstances surrounding the revised project that would cause significant environmental impacts to which the project would contribute considerably, and no new information has become available that shows that the revised project would cause significant environmental impacts. Therefore, no additional environmental review is required beyond this addendum.

Date of Determination:

October 9, 2019
Date

Lisa Gibson
Lisa Gibson
Environmental Review Officer

cc: Kristen Jensen, Deputy City Attorney

Nicholas Roosevelt, J. Abrams Law, P.C.

Appendices

Appendix A: Existing Sites Technical Memorandum Sites

Appendix B: Transportation Memorandum

Appendix A

AAU's Existing Institutional and Residential Sites

Appendix B
Transportation Memorandum