



DRAFT ENVIRONMENTAL IMPACT REPORT

550 O'Farrell Street Project

CITY AND COUNTY OF SAN FRANCISCO
PLANNING DEPARTMENT
CASE NO. **2017-004557ENV**

STATE CLEARINGHOUSE NO. **2019039039**

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SAN FRANCISCO
PLANNING
DEPARTMENT

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550 O'Farrell Street Draft Environmental Impact Report

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ACRONYMS AND ABBREVIATIONS

| | |
|----------------|---|
| ABAG | Association of Bay Area Governments |
| BART | Bay Area Rapid Transit |
| Basin Plan | Water Quality Control Plan for the San Francisco Bay Basin |
| Bay Delta Plan | San Francisco Bay/Sacramento-San Joaquin Delta Estuary Plan |
| CEQA | California Environmental Quality Act |
| CFR | Code of Federal Regulations |
| CRHR | California Register of Historical Resources |
| City | City and County of San Francisco |
| DEIR | Draft Environmental Impact Report |
| EIR | Environmental Impact Report |
| EPA | Environmental Protection Agency |
| FARR | Final Archeological Resources Report |
| general plan | San Francisco General Plan |
| GHG | greenhouse gases |
| gsf | gross square foot |
| HABS | Historic American Building Survey |
| Heritage | San Francisco Architectural Heritage |
| HRE | Historic Resource Evaluation |
| IS | Initial Study |
| LSM | Less than Significant Impact with Mitigation |
| LTS | Less than Significant Impact |
| MMRP | Mitigation Monitoring and Reporting Program |
| MTC | Metropolitan Transportation Commission |
| Muni | Municipal Railway |
| N/A | Not applicable |
| NHPA | National Historic Preservation Act |
| NI | No Impact |
| NOP | Notice of Preparation |

| | |
|---------------------|--|
| NRHP | National Register of Historic Places |
| OPR | State Office of Planning and Research |
| Planning Code | San Francisco Planning Code |
| Planning Commission | San Francisco Planning Commission |
| PM | Particulate Matter |
| PRC | Public Resources Code |
| PTR | San Francisco Planning Department: Preservation Team Review Form |
| RC-4 | Residential-Commercial, High Density Zoning District |
| S | Significant Impact |
| sf | square foot |
| SFMTA | San Francisco Municipal Transportation Agency |
| SFPW | San Francisco Public Works |
| SU | Significant and Unavoidable Impact |
| SUM | Significant and Unavoidable Impact with Mitigation |
| TDM | Transportation Demand Management |
| UTHD | Uptown Tenderloin Historic District |
| Variant | Project Variant |
| VDECS | Verified Diesel Emission Control Strategy |
| VMT | Vehicle miles traveled |

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SUMMARY

A. INTRODUCTION

This document is a draft *environmental impact report* (EIR) for the proposed 550 O'Farrell Street Project (proposed project). This chapter of the EIR provides a summary of the proposed project and project variant, the project sponsor's objectives, a summary of anticipated environmental impacts of the proposed project and project variant and identified mitigation measures, a summary of alternatives including identification of the environmentally superior alternative, and areas of controversy to be resolved.

B. PROJECT SUMMARY

The project sponsor, Sandhill O'Farrell, LLC, proposes to redevelop an approximately 11,800-square-foot (sf) site located at 550 O'Farrell Street in San Francisco's Downtown/Civic Center neighborhood. This EIR evaluates the proposed project, with retained elements of the existing 550 O'Farrell Street structure, and a project variant that would involve complete demolition of the existing building and construction of a proposed building.¹ The intent of analyzing both versions of the proposed project is that it will provide decision-makers with the option of choosing either the retained elements design of the proposed project or the complete demolition design of the project variant.

B.1 Proposed Project

For the proposed project, the project sponsor, Sandhill O'Farrell, LLC, would demolish most of the existing, approximately 35,400-sf, two-story-over-basement parking garage and construct an approximately 104,960-sf, 13-story-over-basement mixed-use building. The proposed project would retain the O'Farrell Street façade of the existing building. The existing building, constructed in 1924, is a contributory building to the Uptown Tenderloin Historic District (UTHD or the district), listed on the National Register of Historic Places, and has been previously determined to also be individually eligible for listing on the California Register of Historical Resources. The proposed project would include 111 residential dwelling units (20 percent, or 22 units, of which would be affordable inclusionary units), a 1,300-sf ground-floor retail/residential amenity space, and basement-level and ground-level space accommodating 156 *class 1* bicycle parking spaces. The class 1 bicycle parking spaces would be provided in two bicycle storage

¹ As discussed in chapter 3, section B, Historic Architectural Resources, "retained elements" or retention of existing building elements in new development would be subject to planning commission guidelines that establish methods for how to retain a portion of an existing structure in an intentional and sensitive manner to maintain neighborhood character.

rooms; eight *class 2* bicycle parking spaces would be installed on the sidewalk along the site's O'Farrell Street frontage.² The proposed project would not provide any vehicle parking.

B.2 Project Variant

The project variant would demolish the existing parking garage and construct an approximately 106,515-sf, 13-story-over-basement mixed-use building. The project variant would include 116 residential dwelling units (20 percent, or 23 units, of which would be affordable inclusionary units) and a 1,300-sf ground-floor retail/residential amenity space. As with the proposed project, the project variant would include basement-level and ground-level space accommodating 156 class 1 bicycle parking spaces, and eight class 2 bicycle spaces on the O'Farrell Street sidewalk. The project variant would not provide any vehicle parking.

Chapter 2, Project Description, pp. 2-1 to 2-36, provides a detailed description of the proposed project and project variant.

C. PROJECT SPONSOR'S OBJECTIVES

The project sponsor, Sandhill O'Farrell, LLC, seeks to achieve the following objectives by undertaking the proposed 550 O'Farrell Street Project:

1. Develop a high-density mixed-income residential development consistent with the purposes of the North of Market Residential Special Use District by fully using the site's zoning capacity of up to 118 dwelling units, within project site constraints, and incorporating on-site affordable units.
2. Replace an outdated private parking garage with a mix of uses compatible with the surrounding Tenderloin neighborhood.
3. Contribute to the city's goal of creating 30,000 additional housing units in an area identified in the General Plan for high density housing in close proximity to downtown and local and regional public transportation.
4. Construct a new building that is compatible with the character of the Uptown Tenderloin Historic District, listed in the National Register.

² San Francisco Municipal Code section 155.1 defines class 1 bicycle parking spaces as "spaces in secure, weather-protected facilities intended for use as long-term, overnight, and work-day bicycle storage by dwelling unit residents, non-residential occupants, and Employees." Class 2 bicycle parking spaces are "bicycle racks located in a publicly-accessible, highly visible location intended for transient or short-term use by visitors, guests, and patrons to the building or use."

5. Provide adequate light and air to all housing units in the new building.
6. Develop a project that is financially feasible and able to support the equity and debt returns required by investors and lenders to finance multi-family residential developments.

D. SUMMARY OF IMPACTS AND MITIGATION MEASURES

This EIR analyzes the potential environmental effects of the proposed project, as identified in the *Notice of Preparation* (NOP) of an EIR, issued March 6, 2019. It is noted that the proposed project described in the NOP³ differs in some details of design and program from the proposed project and project variant analyzed in this EIR. The *Initial Study* (IS) included in Appendix A found that the proposed project or the project variant could result in significant impacts associated with historic architectural resources.

The IS also found that environmental impacts in the following areas would be less than significant or less than significant with implementation of the mitigation measures identified in the IS, and are therefore, not further evaluated in this EIR: land use and land use planning, aesthetics, population and housing, cultural resources (only archeological resources), tribal cultural resources, transportation and circulation, noise, air quality, greenhouse gas emissions, wind, shadow, recreation, utilities and services systems, public services, biological resources, geology and soils, hydrology and water quality, hazards and hazardous materials, mineral resources, energy, agriculture and forest resources, and wildfire.

Table S-1: Summary of Environmental Effects and Mitigation Measures Identified in the EIR, p. S-5, provides an overview of the analysis contained in **chapter 3, Environmental Setting and Impacts**, categorized by the type of impact as follows:

No Impact. No adverse physical changes (or impacts) to the environment are expected.

Less-Than-Significant Impact. An impact that does not exceed the defined significance criteria or would be eliminated or reduced to a less-than-significant level through compliance with existing local, state, and federal laws and regulations.

Less-Than-Significant Impact with Mitigation. An impact that is reduced to a less-than-significant level through implementation of the identified mitigation measure.

Significant and Unavoidable Impact with Mitigation. An adverse physical environmental impact that exceeds the defined significance criteria and can be reduced through compliance with existing

³ As discussed in section G of the Initial Study, the NOP was filed with the County Clerk at a later date, June 10, 2019, and the comment period was extended to July 10, 2019.

local, state, and federal laws and regulations and/or implementation of all feasible mitigation measures but cannot be reduced to a less-than-significant level.

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

With mitigation measures incorporated, the proposed project or the project variant would have project-level significant and unavoidable impacts on historic architectural resources.

The EIR identified mitigation measures that would reduce, but not avoid significant impacts on historic architectural resources, as noted in **Table S-1: Summary of Environmental Effects and Mitigation Measures Identified in the EIR** below. The IS identified mitigation measures that would avoid significant adverse impacts related to cultural resources (archeology and human remains), tribal cultural resources, construction noise, construction vibration, and construction and operational air quality. Those mitigation measures are summarized in **Table S-2: Mitigation Measures in the Initial Study**, p. S-10, and these topics are not further addressed in this EIR.

Table S-1: Summary of Environmental Effects and Mitigation Measures Identified in the EIR

| Environmental Impacts | Significance before Mitigation | Mitigation Measures | Significance after Mitigation |
|---|--------------------------------|--|---|
| <i>Historic Architectural Resources</i> | | | |
| Impact CR-1: The <i>proposed project</i> would demolish most of the existing 550 O'Farrell Street building and cause a substantial adverse change in the significance of a historical resource as defined in the California Environmental Quality Act (CEQA) Guidelines section 15064.5. | Significant | <p>Mitigation Measure M-CR-1a: Documentation Prior to the issuance of demolition or site permits, the project sponsor shall undertake Historic American Building Survey (HABS)-like documentation of the building, structures, objects, materials, and landscaping. The documentation shall be undertaken by a qualified professional who meets the standards for history, architectural history, or architecture (as appropriate), as set forth by the Secretary of the Interior's Professional Qualification Standards (36 CFR, Part 61). The specific scope of the documentation shall be reviewed and approved by the planning department prior to fulfilling documentation but shall consist of the following:</p> <ul style="list-style-type: none"> • <u>Measured Drawings:</u> A set of measured drawings that depict the existing size, scale, and dimension of the building. The planning department preservation staff will accept the original architectural drawings or an as-built set of architectural drawings (plan, section, elevation, etc.). The planning department preservation staff will assist the consultant in determining the appropriate level of measured drawings. • <u>HABS-Level Photography:</u> Digital photographs of the interior and the exterior of building. Large format negatives are not required. The scope of the digital photographs shall be reviewed by planning department preservation staff for concurrence, and all digital photography shall be conducted according to the latest National Park Service standards. The photography shall be undertaken by a qualified professional with demonstrated experience in HABS photography. <p>Photograph views shall include contextual views; views of each side of the building and interior views, including any original interior features, where possible; oblique views of the building; and detail views of character-defining features.</p> <p>All views shall be referenced on a photographic key. This photographic key shall be on a map of the property and shall show the photograph number with an arrow</p> | Significant and Unavoidable with Mitigation |

Table S-1: Summary of Environmental Effects and Mitigation Measures Identified in the EIR

| Environmental Impacts | Significance before Mitigation | Mitigation Measures | Significance after Mitigation |
|-----------------------|--------------------------------|---|-------------------------------|
| | | <p>to indicate the direction of the view. Historic photographs shall also be collected, reproduced, and included.</p> <ul style="list-style-type: none"> <u>HABS-level Historical Report</u> – A written historical narrative and report shall be provided in accordance with the Historic American Building Survey/Historic American Landscape Survey/HABS/HALS Historical Report Guidelines. The written history shall follow an outline format that begins with a statement of significance supported by the development of the architectural and historical context in which the structure was built and subsequently evolved. The report shall also include architectural description and bibliographic information. <u>Softcover Book</u> – A Print-on-Demand softcover book shall be produced that includes the content from the historical report, historical photographs, HABS/HALS photography, measured drawings, and field notes. The Print-on-Demand book shall be made available to the public for distribution. <p>The professional shall prepare the documentation and submit it for review and approval by the planning department's preservation specialist prior to the issuance of demolition permits. The documentation shall be disseminated to the planning department, San Francisco Main Library History Room, Northwest Information Center-California Historical Resource Information System, and San Francisco Architectural Heritage.</p> <ul style="list-style-type: none"> Video recordation shall be undertaken prior to the issuance of demolition or site permits. The project sponsor shall undertake video documentation of the affected historical resource and its setting. The documentation shall be conducted by a professional videographer, preferably one with experience recording architectural resources. The documentation shall be narrated by a qualified professional who meets the standards for history, architectural history, or architecture (as appropriate) set forth by the Secretary of the Interior's Professional Qualification Standards (36 CFR, Part 61). The documentation shall include as much information as possible – using visuals in combination with narration – about the materials, | |

Table S-1: Summary of Environmental Effects and Mitigation Measures Identified in the EIR

| Environmental Impacts | Significance before Mitigation | Mitigation Measures | Significance after Mitigation |
|-----------------------|--------------------------------|---|-------------------------------|
| | | <p>construction methods, current condition, historic use, and historic context of the historical resource. Archival copies of the video documentation shall be submitted to the planning department and to repositories including but not limited to the San Francisco Main Library History Room, Northwest Information Center-California Historical Resource Information System, and San Francisco Architectural Heritage.</p> <p>The video documentation shall be reviewed and approved by the planning department's preservation staff prior to issuance of a demolition permit or site permit.</p> <p>Mitigation Measure M-CR-1b: Interpretation</p> <p>The project sponsor shall provide a permanent display of interpretive materials concerning the history and architectural features of the original 550 O'Farrell Street building and its operation during the period of significance. Interpretation of the site's history shall be supervised by an architectural historian or historian who meets the Secretary of the Interior's Professional Qualification Standards. The interpretative materials (which may include but are not limited to a display of photographs, news articles, memorabilia, and/or video) shall be placed in a prominent setting on the project site visible to pedestrians.</p> <p>A proposal describing the general parameters of the interpretive program shall be approved by the planning department preservation staff prior to issuance of a site permit. The content, media, and other characteristics of such interpretive display shall be approved by the planning department preservation staff prior to issuance of a Temporary Certificate of Occupancy.</p> | |

Table S-1: Summary of Environmental Effects and Mitigation Measures Identified in the EIR

| Environmental Impacts | Significance before Mitigation | Mitigation Measures | Significance after Mitigation |
|---|--------------------------------|--|---|
| Impact CR-2: The <i>project variant</i> would demolish all of the existing 550 O'Farrell Street building and cause a substantial adverse change in the significance of a historical resource as defined in the California Environmental Quality Act (CEQA) Guidelines section 15064.5. | | <p>Mitigation Measures M-CR-1a and 1b, above, would apply to both the proposed project and to the project variant. Mitigation Measure M-CR-2 would apply to the project variant only.</p> <p>Mitigation Measure M-CR-2: Salvage Prior to any demolition that would remove character-defining features, the project sponsor shall consult with planning department preservation staff as to whether any such features may be salvaged, in whole or in part, during demolition/alteration. The project sponsor shall make a good faith effort to salvage materials of historical interest to be utilized as part of the interpretative program. This could include salvage of the gargoyles on the primary façade.</p> | Significant and Unavoidable with Mitigation |
| Impact CR-3: Development of the <i>proposed project</i> or <i>project variant</i> would not cause a substantial adverse change in the significance of the Uptown Tenderloin Historic District. | Less than Significant | None required. | N/A |
| Impact CR-4: Construction activities for the <i>proposed project</i> or <i>project variant</i> could result in physical damage to adjacent historic resources. | Potentially Significant | Mitigation Measure M-NO-2: Construction Vibration Controls (see Table S-2 Mitigation Measures in the Initial Study below). | Less than Significant with Mitigation |

Table S-1: Summary of Environmental Effects and Mitigation Measures Identified in the EIR

| Environmental Impacts | Significance before Mitigation | Mitigation Measures | Significance after Mitigation |
|--|--------------------------------|--|---------------------------------------|
| Impact C-CR-1: The <i>proposed project or project variant</i> , in combination with past, present, and reasonably foreseeable future projects in the vicinity would not result in a significant cumulative impact to historic architectural resources or to the UTHD. | Less than Significant | None required. | N/A |
| The <i>proposed project or project variant</i> , in combination with past, present, and reasonably foreseeable future projects in the project vicinity could result in significant cumulative construction vibration impacts on district contributors. | Potentially Significant | Mitigation Measure M-NO-2: Construction Vibration Controls (in Table S-2 Mitigation Measures in the Initial Study). | Less than Significant with Mitigation |

Source: TRC 2020.

Table S-2: Mitigation Measures in the Initial Study

| Environmental Topic | Mitigation Measures | Significance after Mitigation |
|-------------------------|--|---------------------------------------|
| Archeological Resources | <p>Mitigation Measure M-CR-5: Accidental Discovery The following mitigation measure is required to avoid any potential adverse effect from the proposed project on accidentally discovered buried or submerged historical resources as defined in CEQA Guidelines Section 15064.5(a) and (c), on tribal cultural resources as defined in CEQA Statute Section 21074, and on human remains and associated or unassociated funerary objects. The project sponsor shall distribute the Planning Department archeological resource “ALERT” sheet to the project prime contractor; to any project subcontractor (including demolition, excavation, grading, foundation, pile driving, etc. firms); or utilities firm involved in soils disturbing activities within the project site. Prior to any soils disturbing activities being undertaken each contractor is responsible for ensuring that the “ALERT” sheet is circulated to all field personnel including, machine operators, field crew, pile drivers, supervisory personnel, etc.</p> <p>A preconstruction training shall be provided to all construction personnel performing or managing soils disturbing activities by a qualified archeologist prior to the start of soils disturbing activities on the project. The training may be provided in person or using a video and include a handout prepared by the qualified archeologist. The video and materials will be reviewed and approved by the ERO. The purpose of the training is to enable personnel to identify archeological resources that may be encountered and to instruct them on what to do if a potential discovery occurs. Images of expected archeological resource types and archeological testing and data recovery methods should be included in the training.</p> <p>The project sponsor shall provide the Environmental Review Officer (ERO) with a signed affidavit from the responsible parties (prime contractor, subcontractor(s), and utilities firm) to the ERO confirming that all field personnel have received copies of the Alert Sheet and have taken the preconstruction training.</p> <p>Should any indication of an archeological resource be encountered during any soils disturbing activity of the project, the project Head Foreman and/or project sponsor shall immediately notify the ERO and shall immediately suspend any soils disturbing activities in the vicinity of the discovery until the ERO has determined what additional measures should be undertaken.</p> <p>If the ERO determines that an archeological resource may be present within the project site, the project sponsor shall retain the services of an archeological consultant from the pool of qualified archeological consultants maintained by the planning department archeologist. The archeological</p> | Less than Significant with Mitigation |

Table S-2: Mitigation Measures in the Initial Study

| Environmental Topic | Mitigation Measures | Significance after Mitigation |
|---------------------|---|-------------------------------|
| | <p>consultant shall advise the ERO as to whether the discovery is an archeological resource, retains sufficient integrity, and is of potential scientific/historical/cultural significance. If an archeological resource is present, the archeological consultant shall identify and evaluate the archeological resource. The archeological consultant shall make a recommendation as to what action, if any, is warranted. Based on this information, the ERO may require, if warranted, specific additional measures to be implemented by the project sponsor. The ERO may also determine that the archeological resources is a tribal cultural resource and will consult with affiliated Native Americans tribal representatives, if warranted, as detailed under M-TCR-1 for this project.</p> <p>Measures might include: preservation in situ of the archeological resource; an archeological monitoring program; an archeological testing program; and an interpretative program. If an archeological monitoring program, archeological testing program, or an interpretative program is required, it shall be consistent with the Environmental Planning (EP) division guidelines for such programs and reviewed and approved by the ERO. The ERO may also require that the project sponsor immediately implement a site security program if the archeological resource may be at risk from vandalism, looting, or other damaging actions.</p> <p>The treatment of human remains and of associated or unassociated funerary objects discovered during any soils disturbing activity shall comply with applicable State and federal laws. This shall include immediate notification of the Medical Examiner of the City and County of San Francisco and, in the event of the Medical Examiner's determination that the human remains are Native American remains, notification of the California State Native American Heritage Commission, which will appoint a Most Likely Descendant (MLD). The MLD will complete his or her inspection of the remains and make recommendations or preferences for treatment within 48 hours of being granted access to the site (Public Resources Code section 5097.98). The ERO also shall be notified immediately upon the discovery of human remains.</p> <p>The project sponsor and ERO shall make all reasonable efforts to develop a Burial Agreement ("Agreement") with the MLD, as expeditiously as possible, for the treatment and disposition, with appropriate dignity, of human remains and associated or unassociated funerary objects (as detailed in CEQA Guidelines section 15064.5(d)). The Agreement shall take into consideration the appropriate excavation, removal, recuration, scientific analysis, custodianship, curation, and final disposition of the human remains and associated or unassociated funerary objects. If the MLD agrees to scientific analyses of the remains and/or associated or unassociated funerary objects, the archeological</p> | |

Table S-2: Mitigation Measures in the Initial Study

| Environmental Topic | Mitigation Measures | Significance after Mitigation |
|---------------------|---|-------------------------------|
| | <p>consultant shall retain possession of the remains and associated or unassociated funerary objects until completion of any such analyses, after which the remains and associated or unassociated funerary objects shall be reinterred or curated as specified in the Agreement.</p> <p>Nothing in existing State regulations or in this mitigation measure compels the project sponsor and the ERO to accept treatment recommendations of the MLD. However, if the ERO, project sponsor and MLD are unable to reach an Agreement on scientific treatment of the remains and associated or unassociated funerary objects, the ERO, with cooperation of the project sponsor, shall ensure that the remains and/or mortuary materials are stored securely and respectfully until they can be reinterred on the property, with appropriate dignity, in a location not subject to further or future subsurface disturbance.</p> <p>Treatment of historic-period human remains and of associated or unassociated funerary objects discovered during any soil-disturbing activity; additionally, shall follow protocols laid out in the project's archeological treatment documents, and in any related agreement established between the project sponsor, Medical Examiner and the ERO.</p> <p>The archeological consultant shall submit a Draft Final Archeological Resources Report (FARR) to the ERO that evaluates the historical significance of any discovered archeological resource and describes the archeological and historical research methods employed in the archeological testing/monitoring/data recovery program(s) undertaken. The Draft FARR shall include a curation and deaccession plan for all recovered cultural materials. The Draft FARR shall also include an Interpretation Plan for public interpretation of all significant archeological features.</p> <p>Copies of the Draft FARR shall be sent to the ERO for review and approval. Once approved by the ERO, the consultant shall also prepare a public distribution version of the FARR. Copies of the FARR shall be distributed as follows: California Archeological Site Survey Northwest Information Center (NWIC) shall receive one (1) copy and the ERO shall receive a copy of the transmittal of the FARR to the NWIC. The Environmental Planning division of the planning department shall receive one bound and one non-encrypted, searchable PDF file on CD of the FARR along with copies of any formal site recordation forms (CA DPR 523 series) and/or documentation for nomination to the National Register of Historic Places/California Register of Historical Resources. In instances of public interest in or the high interpretive value of the resource, the ERO may require a different or additional final report content, format, and distribution than that presented above.</p> | |

Table S-2: Mitigation Measures in the Initial Study

| Environmental Topic | Mitigation Measures | Significance after Mitigation |
|---------------------------|--|---------------------------------------|
| Tribal Cultural Resources | <p>Mitigation Measure M-TCR-1: Tribal Cultural Resources Archeological Resource Preservation Plan and/or Interpretive Program</p> <p>In the event of the discovery of an archeological resource of Native American origin, the Environmental Review Officer (ERO), the project sponsor, and the tribal representative, shall consult to determine whether preservation in place would be feasible and effective. If it is determined that preservation-in-place of the tribal cultural resource (TCR) would be both feasible and effective, then the archeological consultant shall prepare an archeological resource preservation plan (ARPP), which shall be implemented by the project sponsor during construction.</p> <p>If the ERO in consultation with the project sponsor and the tribal representative determines that preservation-in-place of the TCR is not a sufficient or feasible option then archeological data recovery shall be conducted, as detailed under M-CR-2a for this project. In addition, the project sponsor shall prepare an interpretive program of the TCR in consultation with affiliated Native American tribal representatives. The plan shall identify proposed locations for installations or displays, the proposed content and materials of those displays or installation, the producers or artists of the displays or installation, and a long-term maintenance program. The interpretive program may include artist installations, preferably by local Native American artists, oral histories with local Native Americans, artifacts displays and interpretation, and educational panels or other informational displays. Upon approval by the ERO and prior to project occupancy, the interpretive program shall be implemented by the project sponsor.</p> | Less than Significant with Mitigation |
| Construction Noise | <p>Mitigation Measure M-NO-1: Construction Noise Controls</p> <ol style="list-style-type: none"> The project sponsor shall develop a set of site-specific noise attenuation measures under the supervision of a qualified acoustical consultant to ensure that maximum feasible noise attenuation will be achieved for the duration of construction activities. Prior to commencement of demolition and construction activities, the project sponsor shall submit the construction noise control plan to the San Francisco Planning Department for review and approval. Noise attenuation measures shall be implemented to meet a goal of not increasing noise levels from construction activities by more than 10 dBA above the ambient noise level at sensitive receptor locations. Noise measures may include but are not limited to those listed below. Equip all internal combustion engine-driven equipment with mufflers, which are in good condition and appropriate for the equipment. | Less than Significant with Mitigation |

Table S-2: Mitigation Measures in the Initial Study

| Environmental Topic | Mitigation Measures | Significance after Mitigation |
|-----------------------------------|--|-------------------------------|
| Construction Noise (continued) | 3. Use “quiet” models of air compressors and other stationary noise sources where technology exists. | |
| | 4. Locate stationary equipment as far away as possible from adjacent land uses and/or construct temporary noise barriers, where feasible, to screen such equipment. Temporary noise barrier fences would provide a 5-dBA noise reduction if the noise barrier interrupts the line-of-sight between the noise source and receptor and if the barrier is constructed in a manner that eliminates any cracks or gaps. | |
| | 5. Unnecessary idling of internal combustion engines should be strictly prohibited. | |
| | 6. The construction staging area should be located on O’Farrell Street and as far as feasible from noise-sensitive receptors. Locate material stockpiles, as well as maintenance/equipment staging and parking areas, as far as feasible from residential receptors. | |
| | 7. Control noise from construction workers’ radios to a point where they are not audible at existing residences bordering the project site. | |
| | 8. Where feasible, temporary power service from local utility companies should be used instead of portable generators. | |
| | 9. Locate cranes as far from adjoining noise-sensitive receptors as possible. | |
| | 10. During final grading, substitute graders for bulldozers, where feasible. Wheeled heavy equipment are quieter than track equipment and should be used where feasible. | |
| | 11. Substitute nail guns for manual hammering, where feasible. | |
| | 12. Avoid the use of hydra break rams and hoe rams during demolition. | |
| | 13. Avoid the use of concrete saws, circular saws, miter/chop saws, and radial arm saws near the adjoining noise-sensitive receptors. Where feasible, shield saws with a solid screen with material having a minimum surface density of 2 pounds per sf (e.g., such as ¾-inch plywood). | |
| | 14. During interior construction, the exterior windows facing noise-sensitive receptors should be closed. | |
| | 15. During interior construction, locate noise-generating equipment within the building to break the line-of-sight to the adjoining receptors. | |
| | 16. The contractor shall prepare a detailed construction schedule for major noise-generating construction activities. The construction plan shall identify a procedure for coordination with adjacent residential land uses so that construction activities can be scheduled to minimize noise disturbance. | |
| | 17. Designate a Construction Manager who shall: | |

Table S-2: Mitigation Measures in the Initial Study

| Environmental Topic | Mitigation Measures | Significance after Mitigation |
|------------------------|--|---------------------------------------|
| | <p>a. Clearly post his/her name and phone number(s) on signs visible during each phase of the construction program.</p> <p>b. Notify area residents of construction activities, schedules, and impacts.</p> <p>c. Receive and act on complaints about construction noise disturbances.</p> <p>d. Determine the cause(s) and implement remedial measures as necessary to alleviate potentially significant problems related to construction noise.</p> <p>e. Request night noise permits from the San Francisco Department of Building Inspection if any activity, including deliveries or staging, is anticipated outside work hours that has the potential to exceed noise standards. If such activity is required in response to an emergency or other unanticipated conditions, night noise permits shall be requested as soon as feasible for any ongoing response activities.</p> <p>f. Notify the planning department's Development Performance Coordinator at the time that night noise permits are requested or as soon as possible after emergency/unanticipated activity causing noise with the potential to exceed noise standards has occurred.</p> <p>18. A noise monitoring log report shall be prepared by the construction manager or other designated person(s) on a weekly basis and shall be made available to the planning department when requested. The log shall include any complaints received, whether in connection with an exceedance or not, as well as any complaints received through calls to 311 or the department of building inspection if the contractor is made aware of them (for example, via a department of building inspection notice, inspection, or investigation). Any weekly report that includes an exceedance or for a period during which a complaint is received should be submitted to the Development Performance Coordinator within 3 business days following the week in which the exceedance or complaint occurred. A report also shall be submitted to the planning department at the completion of each construction phase. The report shall document noise levels, exceedances of threshold levels, if reported, and corrective action(s) taken.</p> | |
| Construction Vibration | <p>Mitigation Measure M-NO-2: Construction Vibration Controls</p> <p>The project sponsor shall retain the services of a qualified structural engineer or vibration consultant and preservation architect that meet the Secretary of the Interior's Historic Preservation Professional</p> | Less than Significant with Mitigation |

Table S-2: Mitigation Measures in the Initial Study

| Environmental Topic | Mitigation Measures | Significance after Mitigation |
|---------------------------------------|---|-------------------------------|
| Construction Vibration (continued) | <p>Qualification Standards to conduct a Pre-Construction Assessment at buildings determined to be historic by the planning department.</p> <p>Prior to any demolition or ground-disturbing activity, a Pre-Construction Assessment shall be prepared to establish a baseline and shall contain written and photographic descriptions of the existing condition of the visible exteriors from public rights-of-way of the adjacent historic buildings and in interior locations upon permission of the owners of the adjacent properties. The Pre-Construction Assessment shall determine specific locations to be monitored and include annotated drawings of the buildings to locate accessible digital photo locations and locations of survey markers and/or other monitoring devices to measure vibrations. The Pre-Construction Assessment shall be submitted to the planning department along with the demolition and site permit applications.</p> <p>The structural engineer and/or vibration consultant in consultation with the preservation architect shall develop, and the project sponsor shall implement, a <i>vibration management and monitoring plan</i> to protect nearby historic buildings against damage caused by vibration or differential settlement caused by vibration during project construction activities. In this plan, the maximum vibration level not to be exceeded at each building shall be 0.25 inches per second, or a level determined by the site-specific assessment made by the structural engineer and/or the vibration consultant in coordination with the preservation architect for the project. The <i>vibration management and monitoring plan</i> shall document the criteria used in establishing the maximum vibration level for the project. The plan shall include pre-construction surveys and continuous vibration monitoring throughout the duration of the major construction project activities that would require heavy-duty equipment to ensure that vibration levels do not exceed the established standard. The <i>vibration management and monitoring plan</i> shall be submitted to Planning Department Preservation staff prior to issuance of any demolition or construction permits. The plan shall include but not be limited to these measures:</p> <ol style="list-style-type: none"> 1. The project sponsors shall incorporate into construction specifications for the proposed project a requirement that the construction contractor(s) use all feasible means to avoid damage to the adjacent buildings including, but not limited to, staging of equipment and materials as far as possible from adjacent buildings to limit damage; using techniques during demolition, excavation, shoring, and construction that create the minimum feasible vibration; maintaining a buffer zone when possible between heavy equipment and adjacent contributing resource(s); | |

Table S-2: Mitigation Measures in the Initial Study

| Environmental Topic | Mitigation Measures | Significance after Mitigation |
|--------------------------|--|---------------------------------------|
| | <p>enclosing construction scaffolding to avoid damage from falling objects or debris; and ensuring appropriate security to minimize risks of vandalism and fire.</p> <ol style="list-style-type: none"> Place operating equipment on the construction site as far as possible from vibration-sensitive receptors. Use smaller equipment to minimize vibration levels below the limits. Avoid using vibratory rollers and tampers near sensitive areas. Select demolition methods not involving impact tools. Modify/design or identify alternative construction methods to reduce vibration levels below the limits. Avoid dropping heavy objects or materials. <p>Should vibration levels be observed in excess of the standard, or if damage to adjacent buildings is observed, construction shall be halted and alternative techniques put in practice, to the extent feasible. The structural engineer and/or vibration consultant and the historic preservation consultant shall conduct regular periodic inspections of digital photographs, survey markers, and/or other monitoring devices during ground-disturbing activity at the project site. The buildings shall be protected to prevent further damage and remediated to pre-construction conditions as shown in the Pre-Construction Assessment with the consent of the building owner. Any remedial repairs shall not require building upgrades to comply with current San Francisco Building Code standards. A final report on the vibration monitoring shall be submitted to Planning Department Preservation staff prior to the issuance of a Certificate of Occupancy.</p> | |
| Construction Air Quality | <p>Mitigation Measure AQ-2: Construction Emissions Minimization</p> <p>The project sponsor or the project sponsor's construction contractor shall comply with the following:</p> <p><i>A. Engine Requirements.</i></p> <ol style="list-style-type: none"> All off-road equipment greater than 25 horsepower and operating for more than 20 total hours over the entire duration of construction activities shall have engines that meet or exceed either U.S. Environmental Protection Agency or California Air Resources Board (ARB) Tier 2 off-road emission standards and have been retrofitted with an ARB Level 3 Verified Diesel Emissions | Less than Significant with Mitigation |

Table S-2: Mitigation Measures in the Initial Study

| Environmental Topic | Mitigation Measures | Significance after Mitigation |
|---|---|-------------------------------|
| Construction Air Quality (continued) | <p>Control Strategy (VDECS). Equipment with engines meeting Tier 4 Interim or Tier 4 Final off-road emission standards automatically meet this requirement.</p> <ol style="list-style-type: none"> Where access to alternative sources of power are available, portable diesel engines shall be prohibited. Diesel engines, whether for off-road or on-road equipment, shall not be left idling for more than two minutes, at any location, except as provided in exceptions to the applicable state regulations regarding idling for off-road and on-road equipment (e.g., traffic conditions, safe operating conditions). The construction contractor shall post legible and visible signs in English, Spanish, and Chinese, in designated queuing areas and at the construction site to remind operators of the two-minute idling limit. The construction contractor shall instruct construction workers and equipment operators on the maintenance and tuning of construction equipment and require that such workers and operators properly maintain and tune equipment in accordance with manufacturer specifications. <p><i>B. Waivers.</i></p> <ol style="list-style-type: none"> The planning department's Environmental Review Officer (ERO) or designee may waive the alternative source of power requirement of subsection (A)(2) if an alternative source of power is limited or infeasible at the project site. If the ERO grants the waiver, the construction contractor must submit documentation that the equipment used for on-site power generation meets the requirements of Subsection (A)(1). The ERO may waive the equipment requirements of subsection (A)(1) if: a particular piece of off-road equipment with an ARB Level 3 VDECS is technically not feasible; the equipment would not produce a desired emissions reduction due to expected operating modes; installation of the equipment would create a safety hazard or impaired visibility for the operator; or, there is a compelling emergency need to use off-road equipment that is not retrofitted with an ARB Level 3 VDECS. If the ERO grants the waiver, the construction contractor must use the next cleanest piece of off-road equipment, according to the table below. | |

Table S-2: Mitigation Measures in the Initial Study

| Environmental Topic | Mitigation Measures | Significance after Mitigation | | | | | | | | | | | | |
|---|---|-------------------------------|--------------------------|-------------------|---|--------|-------------------|---|--------|-------------------|---|--------|-------------------|--|
| Construction Air Quality (continued) | <p>Off-Road Equipment Compliance Step-down Schedule</p> <table><tr><th>Compliance Alternative</th><th>Engine Emission Standard</th><th>Emissions Control</th></tr><tr><td>1</td><td>Tier 2</td><td>ARB Level 2 VDECS</td></tr><tr><td>2</td><td>Tier 2</td><td>ARB Level 1 VDECS</td></tr><tr><td>3</td><td>Tier 2</td><td>Alternative Fuel*</td></tr></table> <p>How to use the table: If the ERO determines that the equipment requirements cannot be met, then the project sponsor would need to meet Compliance Alternative 1. If the ERO determines that the construction contractor cannot supply off-road equipment meeting Compliance Alternative 1, then the construction contractor must meet Compliance Alternative 2. If the ERO determines that the construction contractor cannot supply off-road equipment meeting Compliance Alternative 2, then the Contractor must meet Compliance Alternative 3.</p> <p>*Alternative fuels are not a VDECS.</p> | 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* | |
| | 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* | | | | | | | | | | | | |
| | <p>C. Construction Emissions Minimization Plan. Before starting on-site construction activities, the construction contractor shall submit a <i>Construction Emissions Minimization Plan</i> (Plan) to the ERO for review and approval. The Plan shall state, in reasonable detail, how the construction contractor will meet the requirements of section A.</p> <p>1. 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. The description 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, the description may include 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, the description shall also specify the type of alternative fuel being used.</p> <p>2. The project sponsor shall ensure that all applicable requirements of the Plan have been incorporated into the contract specifications. The Plan shall include a certification statement that the construction contractor agrees to comply fully with the Plan.</p> | | | | | | | | | | | | | |

Table S-2: Mitigation Measures in the Initial Study

| Environmental Topic | Mitigation Measures | Significance after Mitigation |
|-------------------------|---|---------------------------------------|
| | <p>3. The construction contractor shall make the Plan available to the public for review on site during working hours. The construction contractor shall post at the construction site a legible and visible sign summarizing the Plan. The sign shall also state that the public may ask to inspect the Plan for the project at any time during working hours and shall explain how to request to inspect the Plan. The construction contractor shall post at least one copy of the sign in a visible location on each side of the construction site facing a public right-of-way.</p> <p><i>D. Monitoring.</i> After start of Construction Activities, the construction contractor shall submit quarterly reports to the ERO documenting compliance with the Plan. After completion of construction activities and prior to receiving a final certificate of occupancy, the project sponsor shall submit to the ERO a final report summarizing construction activities, including the start and end dates and duration of each construction phase, and the specific information required in the Plan.</p> | |
| Operational Air Quality | <p>M-AQ-4. Best Available Control Technology for Diesel Generators.</p> <p>The project sponsor shall ensure that the backup diesel generator meets or exceeds one of the following emission standards for PM: (1) Tier 4 certified engine, or (2) Tier 2 or Tier 3 certified engine that is equipped with a California ARB Level 3 VDECS. A non-verified diesel emission control strategy may be used if the filter has the same PM reduction as the identical California ARB-verified model and if the air district approves of its use. The project sponsor shall submit documentation of compliance with the air district's New Source Review permitting process (Regulation 2, Rule 2, and Regulation 2, Rule 5) and the emission standard requirement of this mitigation measure to the planning department for review and approval prior to issuance of a permit for a backup diesel generator from any city agency.</p> | Less than Significant with Mitigation |

E. SUMMARY OF PROJECT ALTERNATIVES

Chapter 5 of this EIR analyzes the No Project Alternative, Full Preservation Alternative, and Partial Preservation Alternative. These alternatives represent a reasonable range of potentially feasible alternatives to the proposed project that could attain project objectives and would avoid or substantially lessen the significant adverse environmental impacts to historic architectural resources. The selected alternatives were based on the Secretary of the Interior's Standards for Treatment of Historic Properties (secretary's standards) and applicable land use regulations pertaining to the site. These alternatives are:

- The No Project Alternative, under which the project site would not be redeveloped with the proposed project. The existing building would remain in its current condition and would continue to be occupied by parking uses.
- The Full Preservation Alternative would retain and rehabilitate the 550 O'Farrell Street building as part of the proposed project and would retain a majority of character-defining features of the historic resource at 550 O'Farrell Street in whole. The building's massing and reinforced concrete construction with arched wood-truss roof system would be partially retained. All other character-defining features and spatial relationships would be fully retained. This alternative would have 36 residential units and 1,000 sf of ground-floor retail/residential amenity space. It would also include 17 vehicle parking spaces and six total stories for a building height of about 72 feet. Approximately 16,200 sf (about 46 percent) of the historic building would be retained for adaptive re-use. The Full Preservation Alternative would maintain the front half of the historic building with a four-story addition; the first two stories would be set back 30 feet from the primary (south) façade of the historic building and the top two stories would be set back about 67 feet from the primary façade. The existing structure (floors, ceilings, and columns) would be retained in the front half of the historic building and would be reused for the new building.

This alternative would retain the parking access from O'Farrell Street with adjacent store-front openings. New construction and new uses in the front half of the historic building would require the removal of vehicular circulation ramps and would alter the appearance of the existing interior structure of the building such that it would not resemble the original structure. The rear of the historic building would be demolished to accommodate the addition. Some of the existing building's concrete construction and all of the character-defining plaster finish of the south façade would be retained; however, a new, modern materials palette would be introduced at the addition. The façades of the new addition would be designed with a durable modern material, such as precast concrete, metal paneling or an integrated composite system. The use of the property would change from parking to mixed-

use residential/retail/residential amenity space. The primary façade would be rehabilitated in compliance with the Secretary of the Interior’s Standards for Rehabilitation.

- The Partial Preservation Alternative would retain a majority of the character-defining features of the historic resource at 550 O’Farrell Street in whole; however, it would significantly alter the historic resource’s spatial relationships with its site and environment. The building’s low-scale two-story massing and reinforced concrete construction with an arched wood-truss roof system would not be retained. The Partial Preservation Alternative would include 111 residential units, 1,840 gsf of ground-floor retail/residential amenity space, and 156 bicycle parking stalls. The new structure would be 13 stories and 130 feet in height. Approximately 200 sf of the historic building would be retained at the primary (south) O’Farrell Street façade. The Partial Preservation Alternative would feature a new 13-story building with an 18-foot setback from the primary façade of the historic building. Residential and other uses on levels 2 through 13 of the Partial Preservation Alternative would be similar to the proposed project and project variant floor plans but would be set back 18 feet from the existing garage façade, compared to the proposed project and project variant, where the upper floors would rise directly above the existing façade plane, except for a three- to four-foot-deep setback at the fourth floor. The north façade, east façade, west façade, roof, and interior of the historic building would be demolished to accommodate the new structure. The rear yard of the Partial Preservation Alternative would be reduced to 13 feet in depth, requiring the Zoning Administrator to grant a rear yard modification and a unit exposure variance.

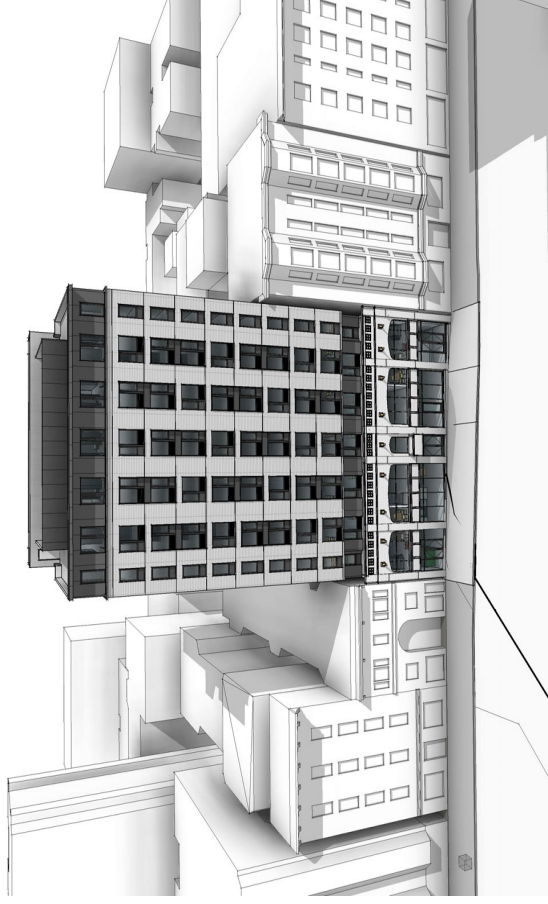
With the Partial Preservation Alternative, some of the building’s concrete construction and all of the character-defining plaster finish would be retained; a new, modern materials palette would be introduced. The façades of the new building would be designed with a durable modern material, such as precast concrete, metal paneling or an integrated composite system.

Figure S-1: Proposed Project, Project Variant and Preservation Alternatives Overview, p. S-23, provides illustrations of the proposed project, the project variant, the full preservation alternative, and the partial preservation alternative. **Table S-3: Comparison of Alternatives for CEQA Analysis**, p. S-25, compares the development program and impacts identified for the proposed project, project variant, and project alternatives.

The Full Preservation Alternative would be the environmentally superior alternative because it would result in less-than-significant impacts related to historic architectural resources and avoid the significant unavoidable impact resulting from the proposed project. The Full Preservation Alternative would retain the historical resource on the project site, rehabilitate its primary façade, and add a four-story addition in compliance with the Secretary of the Interior’s Standards for Treatment of Historic Properties, allowing the building to continue to convey its historic significance.

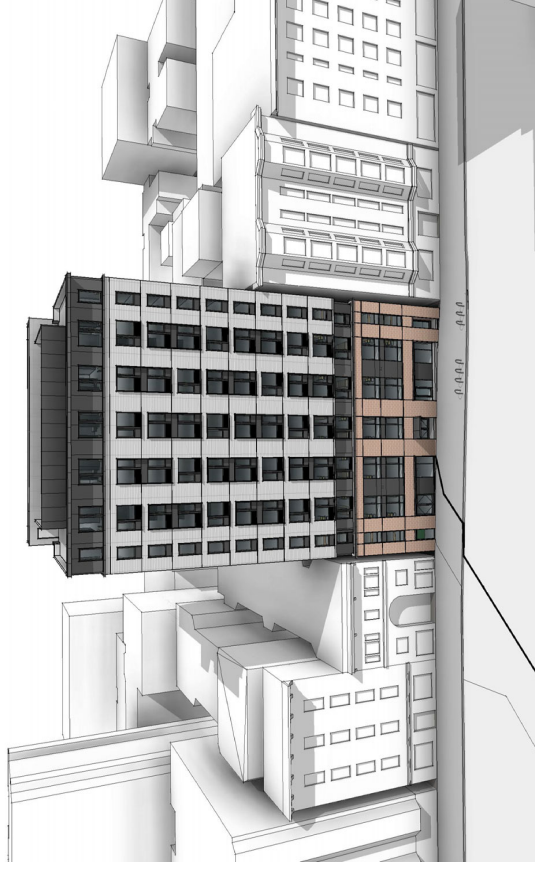
PROPOSED PROJECT

Maintain Existing Facade with 13 Levels of Type I Construction with no Setback from O'Farrell Street. A Vertical Hyphen at Level 4 is Set back from O'Farrell Street Creating Visual Separation Between Existing and New.



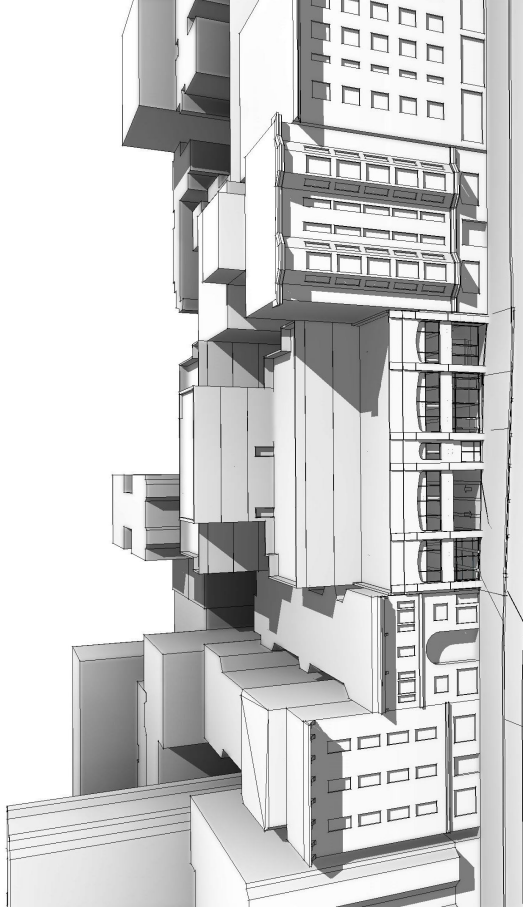
PROJECT VARIANT

13 Levels of Type I Construction with No Setback from O'Farrell Street. A Vertical Hyphen at Level 4 is Setback from O'Farrell Street Creating Visual Separation between Base and Tower Elements



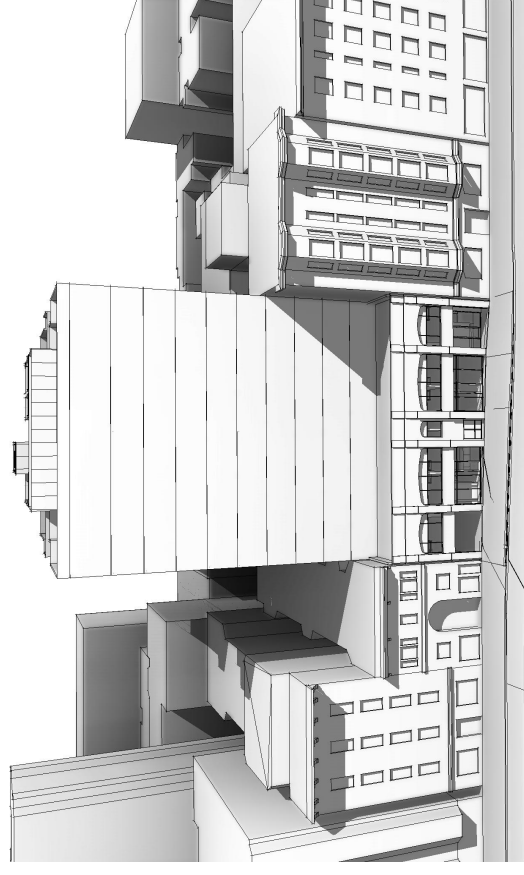
FULL PRESERVATION ALTERNATIVE

Maintain Front Half of Existing Building and Adaptively Re-use Interior. 2 Story Addition Set back 30 Feet with 2 Additional Stories at Rear of Building.



PARTIAL PRESERVATION ALTERNATIVE

Maintain Existing Facade with 13 Levels of Type I Construction Set back 18 Feet from O'Farrell Street.



550 O'FARRELL STREET PROJECT

FIGURE S-1: Proposed Project, Project Variant, & Alternatives Overview

The Partial Preservation Alternative would reduce the impact on the historic architectural resource, when compared to the proposed project and project variant, but that impact would remain significant and unavoidable. Thus, the Full Preservation Alternative would be the environmentally superior alternative.

F. AREAS OF KNOWN CONTROVERSY AND ISSUES TO BE RESOLVED

Publication of the NOP initiated a 30-day public review and comment period that began on March 6, 2019 and ended on April 6, 2019.⁴ During the review and comment period, a total of 15 comments were submitted to the San Francisco Planning Department by interested parties. San Francisco Public Utilities Commission staff commented on water supply information to be addressed in the environmental documents. The Native American Heritage Commission commented on AB 52 tribal cultural resources notification and consultation requirements. Thirteen other responses commented on the NOP review schedule, project merits, construction noise and air quality impacts, views, parking, historic resources, and project alternatives.

The planning department has considered the comments made by the public in preparation of the IS and Draft EIR for the proposed project and project variant. There are no known areas of controversy or issues to be resolved.

⁴ The NOP was filed with County Clerk at a later date, June 10, 2019, and the comment period was extended to July 10, 2019.

| Table S-3: Comparison of Alternatives for CEQA Analysis | | | | | | |
|---|--|---|---|--|---|--|
| | Proposed Project | Project Variant | No Project Alternative | Full Preservation Alternative | Partial Preservation Alternative | |
| Description | | | | | | |
| Project Height | 130 feet | 130 feet | 40 feet | 72 feet | 130 feet | |
| Number of stories | 13 stories | 13 stories | Two above-ground off-set parking levels | 6 stories | 13 stories | |
| <i>Total number of residential units</i> | 111 | 116 | 0 | 36 | 111 | |
| Total Building Area and Parking | | | | | | |
| Residential (includes lobby, amenity, mechanical, open space) | 104,960 gsf | 106,515 gsf | 0 | 42,033 gsf | 108,650 gsf | |
| Retail or other active use | 1,300 gsf | 1,300 gsf | 0 | 1,000 gsf | 1,840 gsf | |
| Bicycle parking spaces - class 1 | 156 | 156 | 0 | 72 | 156 | |
| Bicycle parking spaces - class 2 | 8 | 8 | 0 | 8 | 8 | |
| <i>Vehicle parking spaces</i> | 0 | 0 | 119 | 17 | 0 | |
| Ability to Meet Project Sponsor's Objectives | | | | | | |
| | Proposed Project would meet all of the project sponsor objectives. | Project Variant would meet all of the project sponsor objectives. | No Project Alternative would meet none of the project sponsor objectives. | Full Preservation Alternative would meet some of the project sponsor objectives. | Partial Preservation Alternative would meet some of the project sponsor objectives. | |

Table S-3: Comparison of Alternatives for CEQA Analysis

| | Proposed Project | Project Variant | No Project Alternative | Full Preservation Alternative | Partial Preservation Alternative |
|---|--|---|------------------------|---|---|
| Historic Architectural Resources | | | | | |
| Historic Architectural Resources | <u>Impact CR-1:</u> The proposed project would retain the existing façade of 550 O'Farrell Street, with its Gothic-Revival detail, but demolition of most of the 550 O'Farrell Street building would result in a substantial adverse change to the significance of an individual historical architectural resource as defined by CEQA Guidelines section 15064.5(b). (SUM) | <u>Impact CR-2:</u> The demolition of the 550 O'Farrell Street building would result in a substantial adverse change to the significance of an individual historical architectural resource as defined by CEQA Guidelines section 15064.5(b). (SUM) | No impact. | Less than significant impact compared to the proposed project or the project variant. (LTS) | Similar impacts as the proposed project and project variant and would result in a substantial adverse change to the significance of an individual historical resource as defined by CEQA Guidelines section 15064.5(b). Compared to the project variant, the Partial Preservation Alternative would have less impact. (SUM) |
| Off-Site Historic Resources | <u>Impact CR-3:</u> Demolition of most of the 550 O'Farrell Street building and new construction with the proposed project would not result in a substantial adverse change in the significance of the Uptown Tenderloin Historic District. (LTS) | <u>Impact CR-3:</u> Demolition of the 550 O'Farrell Street building and new construction with the project variant would not result in a substantial adverse change in the significance of the Uptown Tenderloin Historic District. (LTS) | No impact. | Same as the proposed project and project variant. (LTS) | Same as the proposed project and project variant. (LTS) |

Table S-3: Comparison of Alternatives for CEQA Analysis

| | Proposed Project | Project Variant | No Project Alternative | Full Preservation Alternative | Partial Preservation Alternative |
|--|--|--|------------------------|--|--|
| Construction Impacts | <u>Impact CR-4:</u> Proposed project construction would generate excessive groundborne vibration or groundborne noise levels that could damage historic resources. (LSM) | <u>Impact CR-4:</u> Project variant construction would generate excessive groundborne vibration or groundborne noise levels that could damage historic resources. (LSM) | No impact. | Similar impacts as the proposed project and project variant. (LSM) | Similar impacts as the proposed project and project variant. (LSM) |
| Cumulative | <u>Impact C-CR-1:</u> The proposed project, in combination with other past, present, and reasonably foreseeable future projects in the project vicinity, would not result in a significant cumulative impact on a historical architectural resource or the UTHD. (LTS) The proposed project could result in significant cumulative construction vibration impacts on district contributors. (LSM) | <u>Impact C-CR-1:</u> The project variant, in combination with other past, present, and reasonably foreseeable future projects in the project vicinity, would not result in a significant cumulative impact on a historical architectural resource or the UTHD. (LTS) The project variant could result in significant cumulative construction vibration impacts on district contributors. (LSM) | No impact. | Same as the proposed project or the project variant. (LTS) | Same as the proposed project or the project variant. (LTS) |
| NI = no impact; LTS = less than significant; LSM = less than significant with mitigation; S = significant; SU = significant unavoidable; SUM = significant and unavoidable impact with mitigation. | | | | | |

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1. INTRODUCTION

This *Environmental Impact Report* (EIR) analyzes potential environmental effects associated with the 550 O'Farrell Street project (proposed project) and a proposed project variant. This chapter describes the type, purpose, and function of the EIR and describes the environmental review process for the project.

A. PROJECT SUMMARY

The project sponsor, Sandhill O'Farrell, LLC, proposes to redevelop an approximately 11,800-square-foot (sf) site located at 550 O'Farrell Street in San Francisco's Downtown/Civic Center neighborhood. This EIR evaluates the proposed project, with retained elements of the existing 550 O'Farrell Street structure, and a project variant that would involve complete demolition of the existing building. The intent of analyzing both versions of the proposed project is that it will provide decision-makers with the option of choosing either the retained elements design of the proposed project or the complete demolition design of the project variant.

A.1 Proposed Project

For the proposed project, the project sponsor, Sandhill O'Farrell, LLC, would demolish most of the existing, approximately 35,400-sf, two-story-over-basement parking garage and construct an approximately 104,960-sf, 130-foot-tall, 13-story-over-basement mixed-use building. The proposed project would retain the O'Farrell Street façade of the existing building. The existing building, constructed in 1924, is a contributory building to the Uptown Tenderloin Historic District, listed on the National Register of Historic Places, and has been previously determined to also be individually eligible for listing in the California Register of Historical Resources. The proposed project would include 111 residential dwelling units (20 percent of which would be affordable inclusionary units), a 1,300-sf ground-floor retail/residential amenity space, and basement-level and ground-level space accommodating 156 *class 1* bicycle parking spaces. The *class 1* bicycle parking spaces would be provided in two bicycle storage rooms; eight *class 2* bicycle parking spaces would be installed on the sidewalk along the site's O'Farrell Street frontage. The proposed project would not include any vehicle parking.

A.2 Project Variant

The project variant would demolish the existing parking garage and construct an approximately 106,515-sf, 130-foot-tall, 13-story-over-basement, mixed-use building. The project variant would include 116 residential dwelling units (20 percent of which would be affordable inclusionary units), a 1,300-sf ground-floor retail/residential amenity space. As with the proposed project, the project variant would include basement-level and ground-level space accommodating 156 *class*

1 bicycle parking spaces and install eight class 2 bicycle parking spaces on the sidewalk along the site's O'Farrell Street frontage. The project variant would not include any vehicle parking.

B. PURPOSE OF THIS EIR

This EIR analyzes the physical environmental effects associated with implementation of the proposed project or the project variant. This EIR has been prepared by the San Francisco Planning Department (planning department) in the City and County of San Francisco, the lead agency for the proposed project, in compliance with the provisions of the California Environmental Quality Act (CEQA) and the CEQA Guidelines (California Public Resources Code sections 21000 et seq., and California Code of Regulations [CCR] Title 14, sections 15000 et seq., "CEQA Guidelines"), and San Francisco Administrative Code chapter 31. The lead agency is the public agency that has the principal responsibility for carrying out or approving a project.

As described by CEQA and in the CEQA Guidelines, public agencies are charged with the duty to avoid or substantially lessen significant environmental effects, where feasible. In undertaking this duty, a public agency has an obligation to balance a project's significant effects on the environment with its benefits, including economic, social, technological, legal, and other non-environmental characteristics.

As defined in CEQA Guidelines section 15382, a "significant effect on the environment" is:

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

CEQA requires an EIR be prepared before a discretionary decision can be made to approve a project that may cause a significant effect on the environment that cannot be mitigated. The EIR is a public information document for use by governmental agencies and the public to identify and evaluate potential environmental impacts of a project, to identify mitigation measures to lessen or eliminate significant adverse impacts, and to examine feasible alternatives to the project. The City must consider the information in this EIR and make certain findings with respect to each significant effect that is identified. The information contained in this EIR, along with other information available through the public review processes, will be reviewed and considered by the decision-makers prior to a decision to approve or modify the proposed project, or to adopt an alternative to the proposed project.

C. ENVIRONMENTAL REVIEW PROCESS

The environmental review process for a focused EIR per CEQA Guidelines section 15183 includes the following steps: publication of a Notice of Preparation (NOP) of an EIR; publication of a Draft EIR for public review and comment; preparation and publication of responses to public and agency comments on the Draft EIR; and certification of the Final EIR. The EIR process provides an opportunity for the public to review and comment on the proposed project's potential environmental effects and to further inform the environmental analysis.

The planning department prepared an IS for the proposed 550 O'Farrell Street project. Based on the analysis in the IS (see Appendix A), the proposed project or the project variant would result in significant impacts on historic architectural resources.

Therefore, further environmental review of the proposed project and project variant is required for the topic of historic architectural resources. This focused EIR has been prepared to examine the proposed project's or the project variant's specific impacts on historic architectural resources; identify mitigation for potentially significant impacts; and analyze whether proposed mitigation measures would reduce the significant environmental impacts to less-than-significant levels. This focused EIR also analyzes alternatives to the proposed project or the project variant that could substantially reduce or eliminate one or more significant impacts of the proposed project but could still feasibly attain most of the basic project objectives. The other environmental topics are addressed only in the IS, which determined that the proposed project's or project variant's potential impacts on those topics would be less than significant or would be reduced to less-than-significant levels with implementation of mitigation measures identified in the IS.

C.1 Notice of Preparation of an EIR

Sandhill O'Farrell LLC filed an Environmental Evaluation application with the planning department on July 19, 2017. The filing of the application initiated the environmental review process. During the subsequent review process, the project sponsor revised the project plans. This EIR evaluates the proposed project and project variant plans dated October 1, 2019.

In accordance with CEQA Guidelines sections 15063 and 15082, the planning department, as lead agency, published and distributed an NOP; the NOP includes a project description, and indicates topics to be addressed in the EIR. The NOP anticipated that the EIR will include a focused assessment of impacts to historic architectural resources. Environmental impacts related to land use and land use planning, aesthetics, population and housing, subsurface cultural (archeological) resources and human remains, tribal cultural resources, transportation and circulation, noise, air quality, greenhouse gas emissions, wind, shadow, recreation, utilities and service systems, public services, biological resources, geology and soils, paleontological resources, hydrology and water quality, hazards and hazardous materials, mineral resources,

energy, agriculture and forest resources, and wildfire were anticipated to be analyzed in the IS. (It is noted that the proposed project described in the NOP differs in some details of design and program from the proposed project and project variant analyzed in this EIR).

Publication of the NOP initiated a 30-day public review and comment period that began on March 6, 2019 and ended on April 5, 2019.⁵ (See Appendix B for the Notice of Availability of the NOP). During the review and comment period, a total of 15 comments were submitted to the planning department by interested parties. San Francisco Public Utilities Commission staff commented on water supply information to be addressed in the environmental documents. The Native American Heritage Commission commented on AB 52 tribal cultural resources notification and consultation requirements. Thirteen other responses commented on the NOP review schedule, project merits, construction noise and air quality impacts, views, parking, historic resources, and project alternatives.

The planning department has considered the comments made by the public in preparation of the IS and Draft EIR for the proposed project and project variant. There are no known areas of controversy or issues to be resolved.

C.2 Draft EIR and IS Public Review and Opportunities for Public Participation

The CEQA Guidelines and San Francisco Administrative Code chapter 31 encourage public participation in the planning and environmental review processes. The City will provide opportunities for the public to present comments and concerns regarding this EIR and its CEQA process. These opportunities will occur during a public review and comment period and a public hearing before the San Francisco Planning Commission.

The Draft EIR is available for public review and comment on the planning department's Negative Declarations and EIRs web page (<http://tinyurl.com/sfceqadocs>). A USB or paper copy of the Draft EIR will be mailed upon request. Referenced materials will also be made available for review upon request. Please contact the project planner, Jennifer McKellar, at CPC.550OFarrellStEIR@sfgov.org or (415) 575-8754 to make a request. Written comments should be addressed to Jennifer McKellar, San Francisco Planning Department, 1650 Mission Street, Suite 400, San Francisco, CA 94103, or emailed to CPC.550OFarrellStEIR@sfgov.org. The public comment period for this Draft EIR is from May 21, 2020, to July 7, 2020.

The historic preservation commission will hold a public hearing on this Draft EIR to consider providing its comments on the Draft EIR. The public hearing will be held June 17, 2020, beginning

⁵ The NOP was filed with the San Francisco Office of the County Clerk at a later date, June 10, 2019, and the comment period was extended to July 10, 2019.

at 12:30 p.m. Please be advised that due to the COVID-19 emergency, the historic preservation commission may be required to conduct this hearing remotely. Additional information may be found on the planning department's website at www.sfplanning.org.

The planning commission will hold a public hearing on this EIR during the 45-day public review and comment period for this EIR to solicit public comment on the information presented in this Draft EIR. The public hearing will be held on June 25, 2020, beginning at 1 p.m. or later. Please be advised that due to the COVID-19 emergency, the planning commission may be required to conduct this hearing remotely. Additional information may be found on the planning department's website at www.sfplanning.org.

In addition, members of the public are invited to submit written comments on the adequacy and accuracy of the Draft EIR. Written public comments may be submitted to:

San Francisco Planning Department
 Attention: Jennifer McKellar, Environmental Coordinator
 1650 Mission Street, Suite 400
 San Francisco, CA 94103
CPC.550OFarrellStEIR@sfgov.org

Comments are most helpful when they address the environmental analysis itself or suggest specific alternatives and/or additional measures that would better mitigate significant environmental impacts of the proposed project.

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

C.3 Final EIR and EIR Certification

Following the close of the public review and comment period, the City will prepare and publish a document titled "Responses to Comments," which will contain all written and recorded oral comments on this Draft EIR and written responses to those comments, along with copies of the letters or emails received, a transcript of the public hearing, and any necessary revisions to the Draft EIR. The Draft EIR and the Responses to Comments document will constitute the Final EIR. Not less than 10 days prior to the Planning Commission hearing to consider certification of the Final EIR, the Final EIR will be made available to the public and to any board(s), commission(s) or department(s) that will carry out or approve the proposed project. The Planning Commission, in an advertised public meeting(s), will consider the documents and, if found adequate, will certify that the Final EIR: (1) has been completed in compliance with CEQA; (2) was presented to

the Planning Commission, which then reviewed and considered the information contained in the Final EIR prior to approving the proposed project or project variant; and (3) reflects the lead agency's independent judgment and analysis.

CEQA requires that agencies shall neither approve nor implement a project unless the project's significant environmental impacts have been reduced to a less-than-significant level, essentially eliminating, avoiding, or substantially lessening the potentially significant impacts, except when certain findings are made. If an agency approves a project that would result in the occurrence of significant adverse impacts that cannot feasibly be mitigated to less-than-significant levels (that is, significant and unavoidable impacts), the agency must state the reasons for its action in writing, demonstrate that mitigation is infeasible based on the EIR or other information in the record, and adopt a statement of overriding considerations.

C.4 Mitigation Monitoring and Reporting Program

At the time of project approval, CEQA and the CEQA Guidelines require agencies to adopt a mitigation monitoring and reporting program (MMRP) that it has made a condition of project approval in order to mitigate or avoid significant impacts on the environment (CEQA section 21081.6; CEQA Guidelines section 15097). This EIR identifies and presents mitigation measures and improvement measures that would form the basis of such a monitoring and reporting program. Any mitigation and improvement measures adopted by the agency and City as conditions for approval of the project would be included in the MMRP.

D. ORGANIZATION OF THE DRAFT EIR

This EIR has been organized as follows:

Summary. This chapter summarizes the EIR by providing a concise overview of the proposed project and project variant, the environmental impacts that would result from the proposed project, mitigation and improvement measures identified to reduce or eliminate these impacts, project alternatives and their comparative environmental effects, and controversial areas and issues to be resolved.

Chapter 1, Introduction. This chapter includes a discussion of the purpose of the EIR, a discussion of the environmental review process, a summary of the comments received on the scope of the EIR, and a brief outline of this document's organization.

Chapter 2, Project Description. This chapter provides a detailed description of the proposed project and the project variant, including the project background and objectives, project location, existing site land use characteristics, project components and characteristics,

development schedule (including anticipated construction activities), and identifies project approvals and the intended uses of the EIR.

Chapter 3, Environmental Setting and Impacts. This chapter provides analysis for the historic architectural resources topic previously identified for further analysis. This topic contains a description of the environmental setting (or existing conditions), regulatory framework, approach to the analysis, project-level and cumulative impacts, and mitigation measures as applicable.

Chapter 4, Other CEQA Issues. This chapter describes any growth-inducing impacts that could result from the proposed project or project variant, irreversible changes to the environment, significant and unavoidable environmental impacts, and presents any areas of controversy left to be resolved.

Chapter 5, Alternatives. This chapter analyzes alternatives to the proposed project or project variant including the required No Project Alternative, compares their environmental effects to those of the proposed project and project variant, and identifies the environmentally superior alternative. Alternatives evaluated in this chapter include the following:

- No Project Alternative
- Full Preservation Alternative
- Partial Preservation Alternative

Chapter 6, Report Preparers. This chapter presents a list of persons involved in preparation of this EIR.

Appendices. The following appendices are included in this EIR:

Appendix A: Initial Study

Appendix B: Notice of Availability of Notice of Preparation of an Environmental Impact Report

Appendix C: Historic Resource Evaluations

C-1: Historic Resource Evaluation Part 1

C-2: Historic Resource Evaluation Part 2-Compatibility & Impacts Analysis

C-3: San Francisco Planning Department Preservation Team Review Form

C4: Preservation Alternatives Memorandum

Appendix D: Noise and Vibration Assessment

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2. PROJECT DESCRIPTION

A. PROJECT OVERVIEW

The project site is located at 550 O'Farrell Street, between Leavenworth and Jones streets, in the Downtown/Civic Center neighborhood of San Francisco. A public parking garage currently occupies the rectangular, approximately 11,800-square-foot (sf) project site (Assessor's Block 0318, Lot 009).

This EIR evaluates the proposed project, with retained elements of the existing 550 O'Farrell Street structure, and a project variant that would involve complete demolition of the existing building. This will provide decision-makers with the option of choosing either the retained elements design of the proposed project or the complete demolition design of the project variant.

In summary, for the proposed project, the project sponsor, Sandhill O'Farrell, LLC, would demolish most of the existing, approximately 35,400-sf, two-story-over-basement parking garage and construct an approximately 104,960-sf, 13-story-over-basement mixed-use building. The proposed project would retain the O'Farrell Street façade of the existing building. The existing building, constructed in 1924, is a contributory building to the Uptown Tenderloin Historic District (the district), listed on the National Register of Historic Places, and has been previously determined to also be individually eligible for listing on the California Register of Historical Resources. The proposed project would include 111 residential dwelling units (20 percent of which would be affordable inclusionary units), a 1,300-sf ground-floor retail/residential amenity, and basement-level and ground-level space accommodating 156 *class 1* bicycle parking spaces. The class 1 bicycle parking spaces would be provided in two bicycle storage rooms; eight class 2 bicycle parking spaces would be installed on the sidewalk along the site's O'Farrell Street frontage.⁶ The proposed project would not include any vehicle parking.

The project variant would demolish the existing parking garage and construct an approximately 104,960-sf, 13-story-over-basement mixed-use building. The project variant would include 116 residential dwelling units (20 percent of which would be affordable inclusionary units) and a 1,300-sf ground-floor retail/residential amenity space. As with the proposed project, the project variant would include basement-level and ground-level space accommodating 156 class 1 bicycle

⁶ San Francisco Municipal Code section 155.1 defines class 1 bicycle parking spaces as "spaces in secure, weather-protected facilities intended for use as long-term, overnight, and work-day bicycle storage by dwelling unit residents, non-residential occupants, and Employees." Class 2 bicycle parking spaces are "bicycle racks located in a publicly-accessible, highly visible location intended for transient or short-term use by visitors, guests, and patrons to the building or use."

parking spaces; eight class 2 bicycle parking spaces would be installed on the sidewalk along the site's O'Farrell Street frontage. The project variant would not include any vehicle parking.

The project description chapter includes text and figures relevant to both the proposed project and the project variant, such as the project location and site characteristics. The chapter then presents the proposed project's characteristics and design, with accompanying figures, and the project variant's characteristics and design, with accompanying figures. Where proposed project and project variant floor plans and elevations area essentially the same, the project variant references the proposed project figures.

B. PROJECT LOCATION AND SITE CHARACTERISTICS

The project site is located on the north side of O'Farrell Street on the block bounded by O'Farrell Street to the south, Geary Street to the north, Jones Street to the east, and Leavenworth Street to the west (see **Figure 2-1: Project Site Location**, p. 2-4). The project site is within an RC-4 (Residential-Commercial, High Density) zoning district, 80-T-130-T height and bulk district, and the North of Market Residential Special Use District No. 1. The height limit in the 80-T-130-T height and bulk district is 130 feet, but a conditional use authorization is required for the construction of a building exceeding a height of 80 feet. The "T" bulk designation limits the bulk of buildings above the setback height established pursuant to Planning Code section 132.2 to a maximum length dimension of 110 feet and a maximum diagonal dimension of 125 feet unless a conditional use authorization exception is granted for greater bulk. The O'Farrell Street sidewalk slopes down from west to east with elevations along the front of the building varying between 105 feet and 101 feet.⁷ The adjacent properties fronting Geary Street to the north of the site are at higher grades because the site vicinity slopes up to the north.

The project site consists of an 86-foot-wide by 138-foot-deep rectangular lot, developed as and currently used as a public parking garage (see **Figure 2-2: Project Site and Surrounding Land Uses**, p. 2-5). The existing two-story-over-basement parking garage is approximately 35,400 sf in size and approximately 40 feet tall. An approximately 11.5-foot-deep partial basement level extends under the sidewalk along O'Farrell Street. Two existing, approximately 26- to 28-foot-wide curb cuts provide access to the garage from O'Farrell Street. The existing building, constructed in 1924, is located in and a contributor to the National Register-listed Uptown Tenderloin Historic District and has been previously determined to be individually eligible for

⁷ Elevations are based on San Francisco 2013 Vertical Datum.

listing in the California Register of Historical Resources⁸ (see **Figure 2-3: Existing Building Photograph and Building Section**, p. 2-6).

As shown on **Figure 2-2: Project Site and Surrounding Land Uses**, p. 2-5, four adjacent properties border the site (one to the east, one to the west, and two to the north). A two-story hotel building over ground-floor retail, at 570 O'Farrell Street, occupies the site to the west. A six-story apartment building, at 540 O'Farrell Street, occupies the site to the east. The adjacent properties to the north include a five-story apartment building at 665 Geary Street and a vacant lot containing the brick rubble remains of a demolished structure at 651 Geary Street.

B.1 Proposed Project

The proposed project would demolish most of the existing, approximately 35,400-sf, two-story-over-basement parking garage and construct an approximately 104,960-sf, 130-foot-tall, 13-story-over-basement mixed-use building. The proposed project would retain the O'Farrell Street façade of the existing building. The proposed project would include 111 residential dwelling units (20 percent of which would be affordable inclusionary units), a 1,300-sf ground-floor retail/residential amenity space, and basement-level and ground-level space accommodating 156 class 1 bicycle parking spaces. The class 1 bicycle parking spaces would be provided in two bicycle storage rooms; eight class 2 bicycle parking spaces would be installed on the sidewalk along the site's O'Farrell Street frontage (see **Figure 2-4: Proposed Project - Basement Level Plan** through **Figure 2-10: Proposed Project - Level 13 Plan**, pp. 2-8 to 2-14). The proposed project would provide three new street trees on the O'Farrell Street sidewalk. The residential uses would occupy approximately 78,990 gross square feet (gsf) of the proposed building. The dwelling unit mix would include 35 one-bedroom units, 62 two-bedroom units, and 14 three-bedroom units; 20 percent of the total units (or 22 units) would be affordable inclusionary units.⁹

⁸ Carey & Co. Inc., *Historic Resource Evaluation—Part 1. 550 O'Farrell Street, San Francisco California*, September 1, 2017. This document (and all other documents cited in this report, unless otherwise noted) is available at the San Francisco Planning Department, 1650 Mission Street, Suite 400 as part of Case File No. 2017-004557ENV.

⁹ The planning code requirement is 25 percent on-site below-market-rate units, payment of an Affordable Housing Fee based on 33 percent below market rate units, or a combination of the above within the North of Market Special (Use District. The proposed project and the project variant would provide a combination of 20 percent on-site units, 22 or 23 units, respectively (20 percent of the total number of units), and payment of a partial Affordable Housing Fee in compliance with planning code requirements.



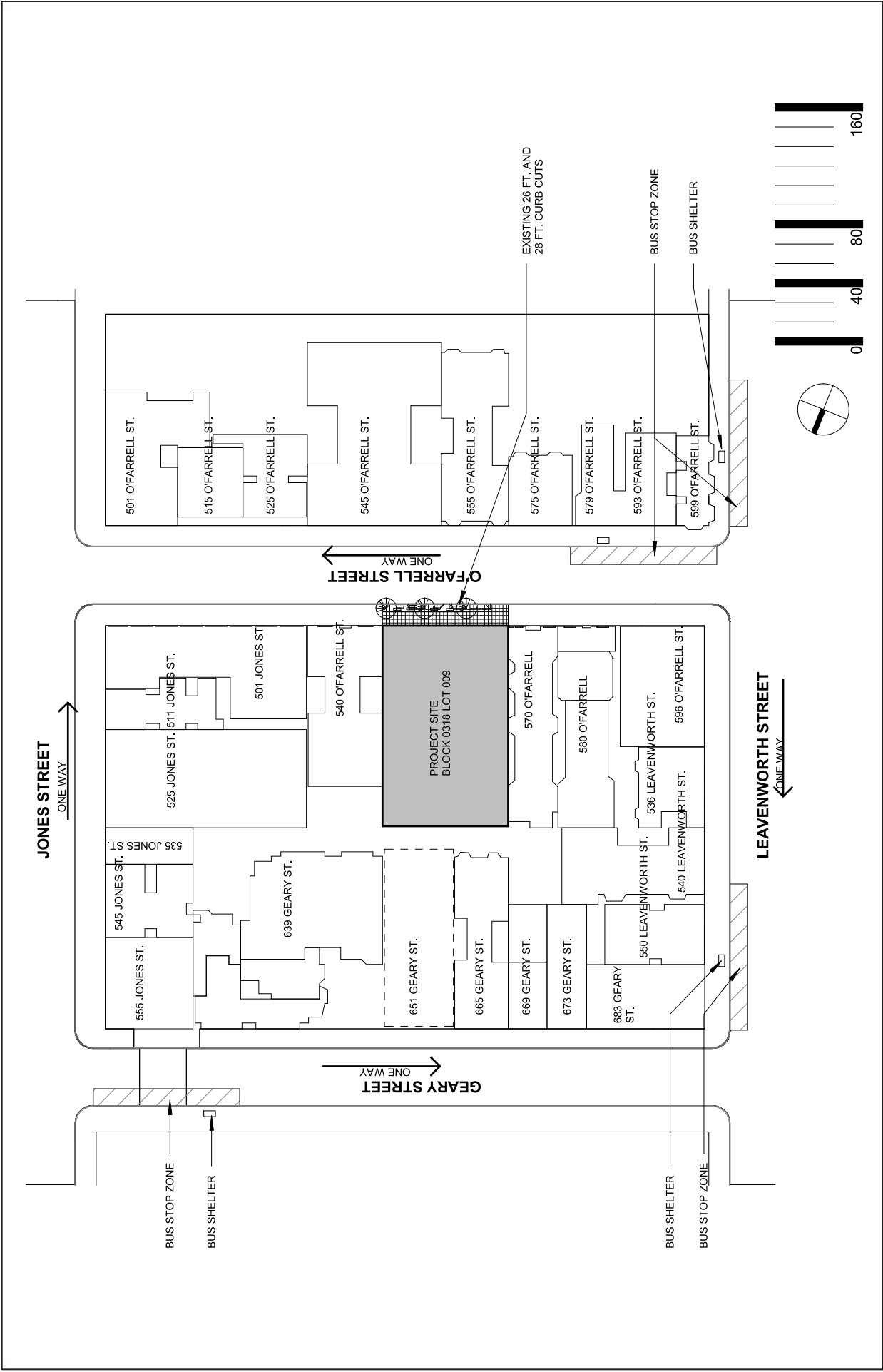
SOURCE: City and County of San Francisco Planning Department



550 O'FARRELL STREET PROJECT

Case No. 2017-004557ENV

FIGURE 2-1: Project Site Location

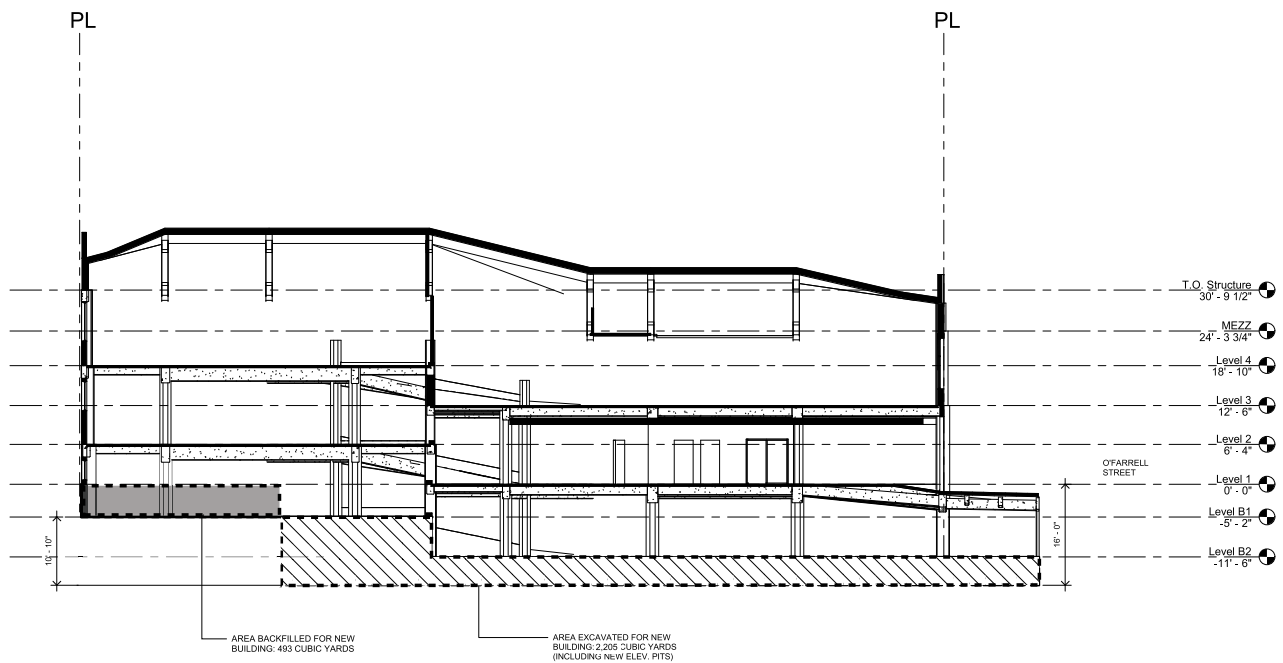


SOURCE: BRICK INC.

550 O'FARRELL STREET PROJECT

Case No. 2017-004557ENV

FIGURE 2-2: Project Site and Surrounding Land Uses



SOURCE: BRICK INC.

550 O'FARRELL STREET PROJECT

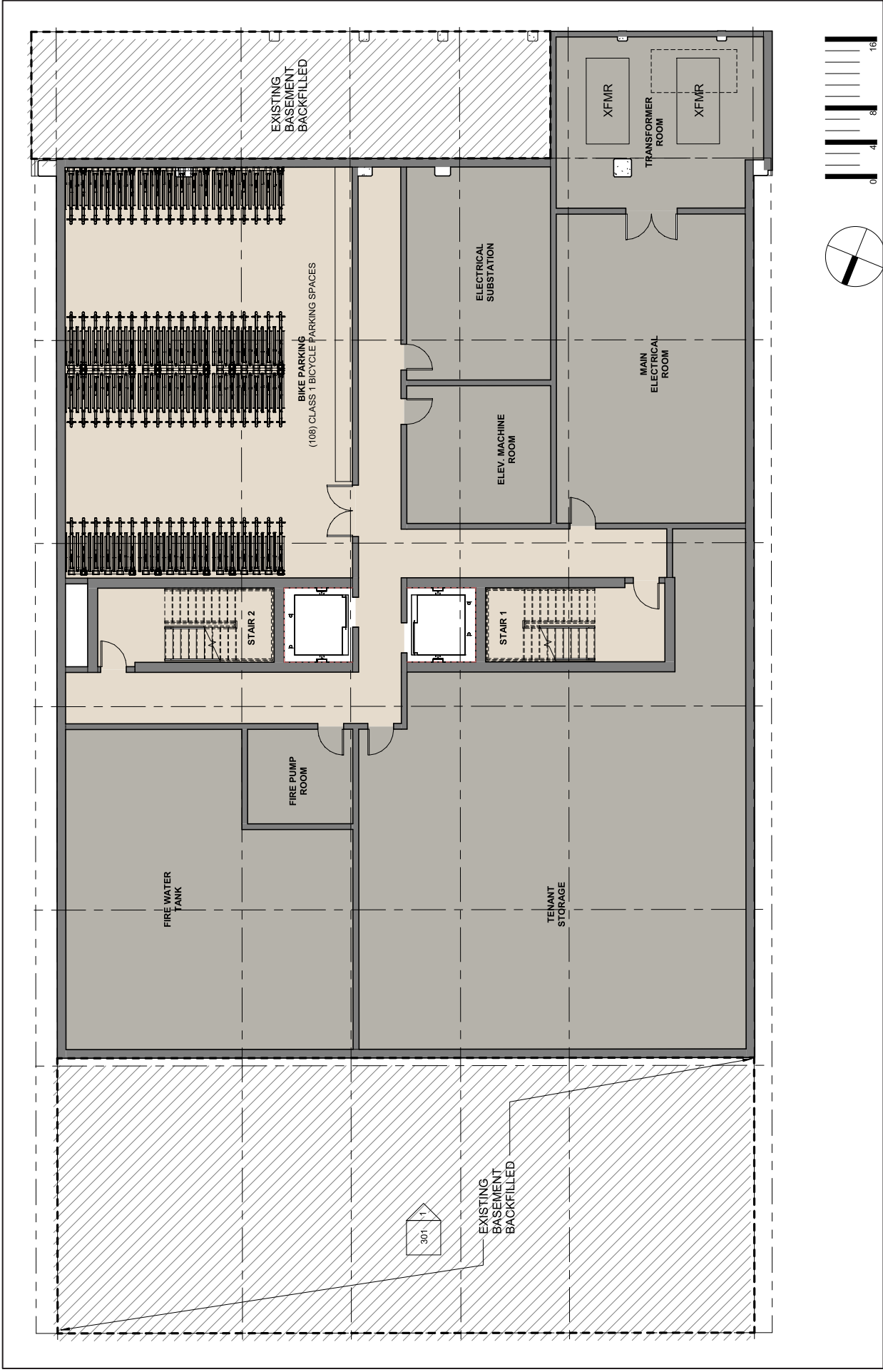
Case No. 2017-004557ENV

Figure 2-3: Existing Building Photograph and Building Section

The proposed building would be 13 stories tall, reaching 130 feet in height (146 feet in height to the top of the elevator penthouse). The building's parapet wall would be 2 feet in height, the mechanical and stair penthouse would be 10 feet in height, and the elevator penthouse would be 16 feet above the roofline, respectively (see **Figure 2-12: Proposed Project - South (O'Farrell Street) Elevation** through **Figure 2-15: Proposed Project - West Elevation**, pp. 2-19 to 2-22). Parapets and mechanical, stair, and elevator penthouses are exempt from overall building height limits pursuant to Planning Code section 260(b)(1)(F). The proposed building would be set back approximately 31 feet from the rear property line.

The basement level of the proposed building would include a bicycle storage room with 108 class 1 bicycle parking spaces, tenant storage, and mechanical space (see **Figure 2-4: Proposed Project - Basement Level Plan**, p. 2-8). The basement level would include a transformer vault below part of the O'Farrell Street sidewalk. The existing 550 O'Farrell Street building includes basement level space below the sidewalk that would be partially filled for the proposed project.) The ground floor (level 1) would contain four residential units (3 one-bedroom units and 1 three-bedroom unit), retail or residential amenity space, residential lobby, leasing office, mechanical space, and 48 class 1 bicycle parking spaces (see **Figure 2-5: Proposed Project - Site Plan and Ground Floor (Level 1) Plan**, p. 2-9 and **Figure 2-6: Proposed Project - Level 2 Plan**, p. 2-10). Level 1 would also include an approximately 2,100-sf common open space terrace, and private open space for the four residential units. The retail/residential amenity space, located in the southeast corner of the ground floor, and the residential lobby would be accessed from separate entrances fronting O'Farrell Street. Eight class 2 bicycle parking spaces would be provided on the sidewalk on O'Farrell Street.

The 111 residential units would be located on levels 1 through 13. As previously noted, level 1 would contain four residential units. Level 2 would include seven residential units (2 one-bedroom, 2 two-bedroom, and 3 three-bedroom units) and a 1,600-sf fitness center/amenity space for the residential uses. About 950 sf of amenity space would be on level 3 as would the lofts associated with the 2 three-bedroom units on level 2, (see **Figure 2-6: Proposed Project - Level 2 Plan**, p. 2-10 and **Figure 2-7: Proposed Project Level 3 Plan**, p. 2-11). The remaining 100 units (one-, two-, and three-bedroom units) would be located on levels 3 through 13 (see **Figure 2-8: Proposed Project - Level 4 Plan**, p. 2-12, **Figure 2-9: Proposed Project - Levels 5-12 Plans**, p. 2-13, and **Figure 2-10: Proposed Project - Level 13 Plan**, p. 2-14). Level 13 would include approximately 3,225 sf of common residential open space, four 2-bedroom units and one 1-bedroom unit. The roof level would include a mechanical penthouse (see **Figure 2-11: Proposed Project - Roof Plan**, p. 2-18). A diesel-powered combustion engine backup generator equipped with best available control technology for emissions control would be installed on the roof level within the enclosed mechanical penthouse structure. The generator would supply emergency power for exit lighting, fire alarm, fire pumps, smoke-control systems, and other loads such as security systems. Other rooftop equipment would include a cooling tower, exhaust fans, and heat pumps. **Table 2-1: Proposed Project and Project Variant Characteristics**, p. 2-15, summarizes the proposed project and project variant uses and dimensions.



SOURCE: BRICK INC.

550 O'FARRELL STREET PROJECT

Case No. 2017-004557ENV

FIGURE 2-4: Proposed Project – Basement Level Plan



SOURCE: BRICK INC.

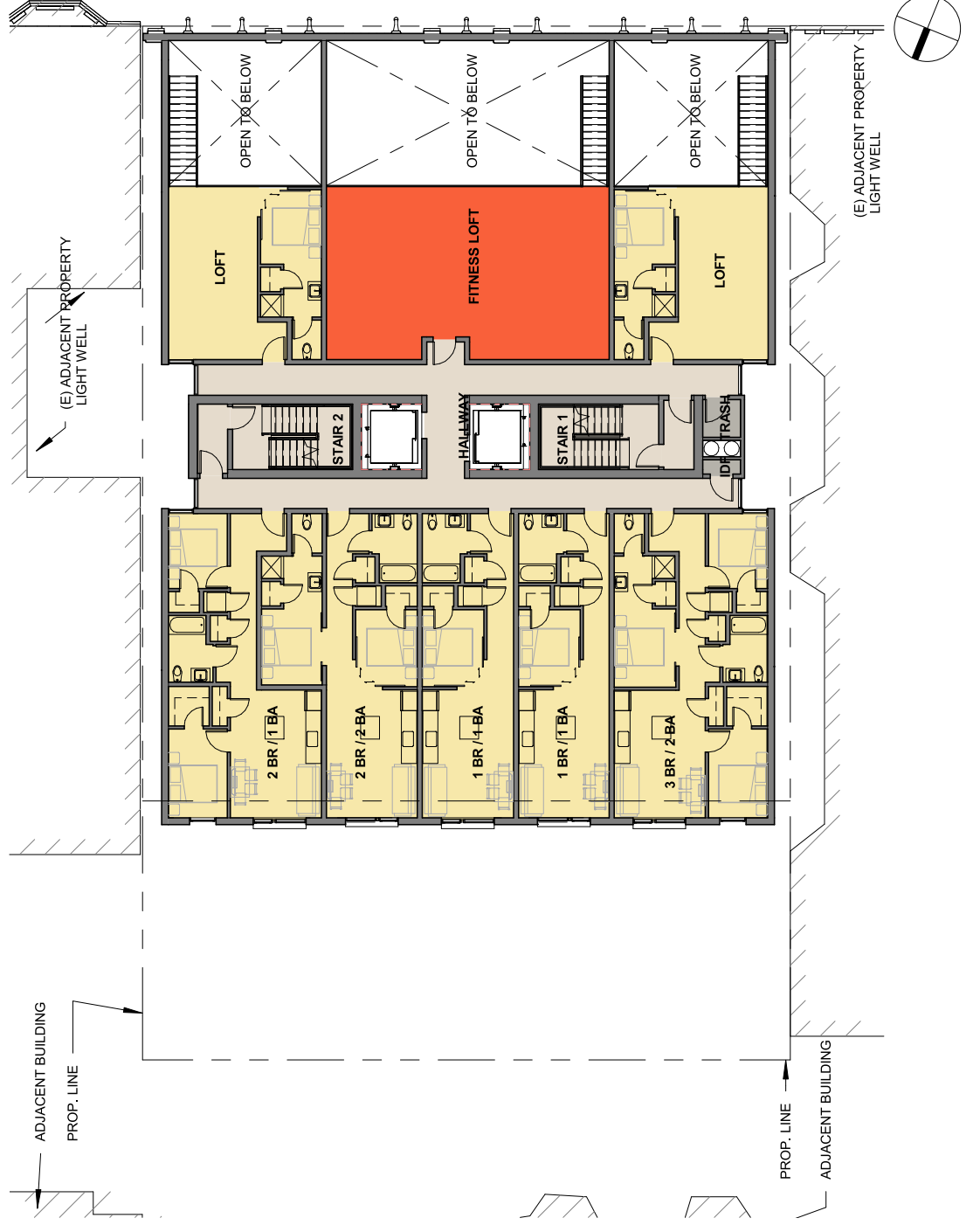
550 O'FARRELL STREET PROJECT

Case No. 2017-004557ENV

FIGURE 2-5: Proposed Project – Site Plan and Ground Floor (Level 1) Plan



550 O'FARRELL STREET PROJECT

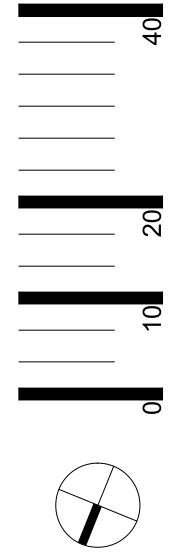
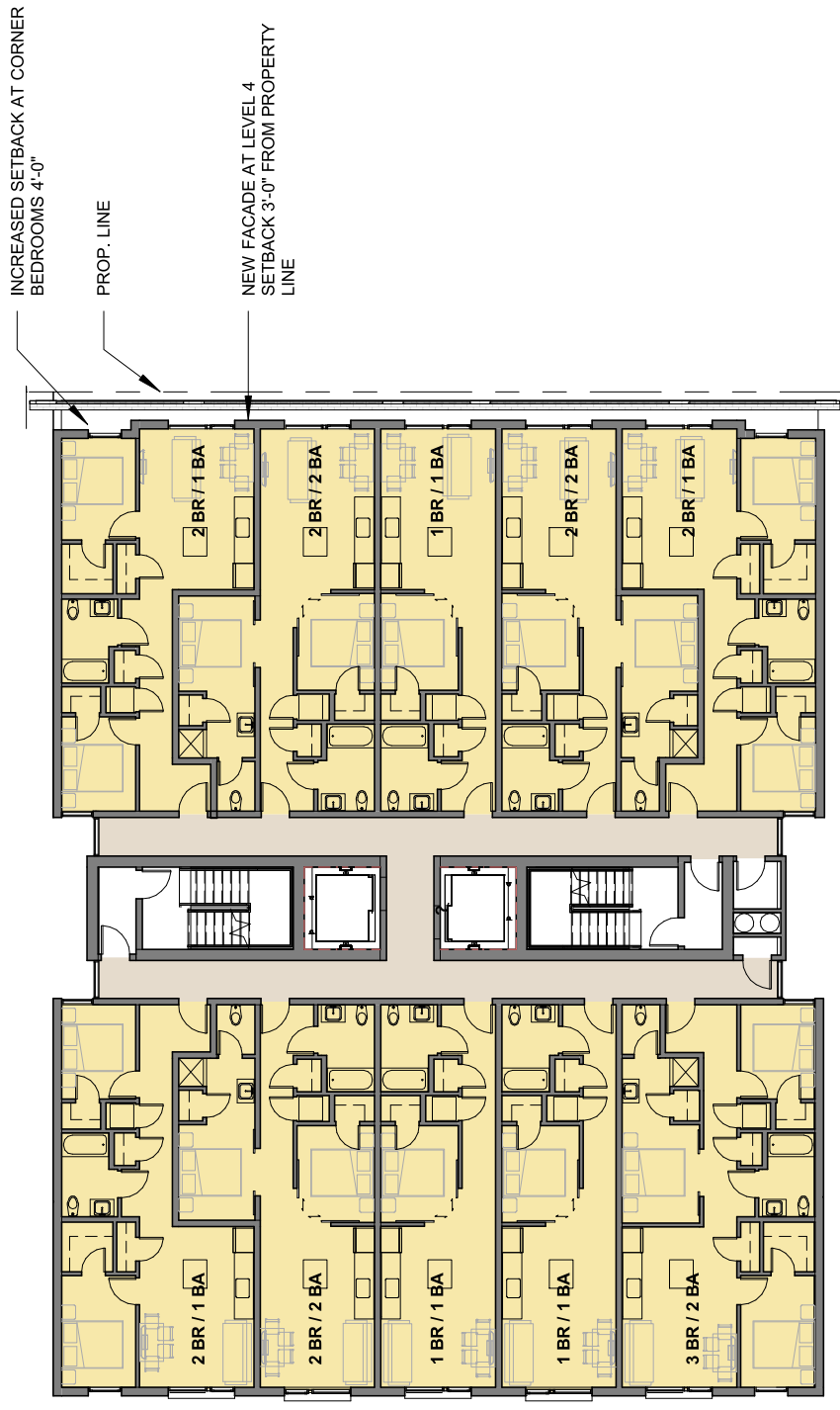


SOURCE: BRICK INC.

550 O'FARRELL STREET PROJECT

Case No. 2017-004557/ENV

FIGURE 2-7: Proposed Project – Level 3 Plan

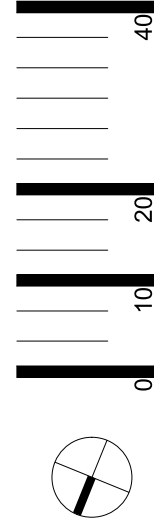
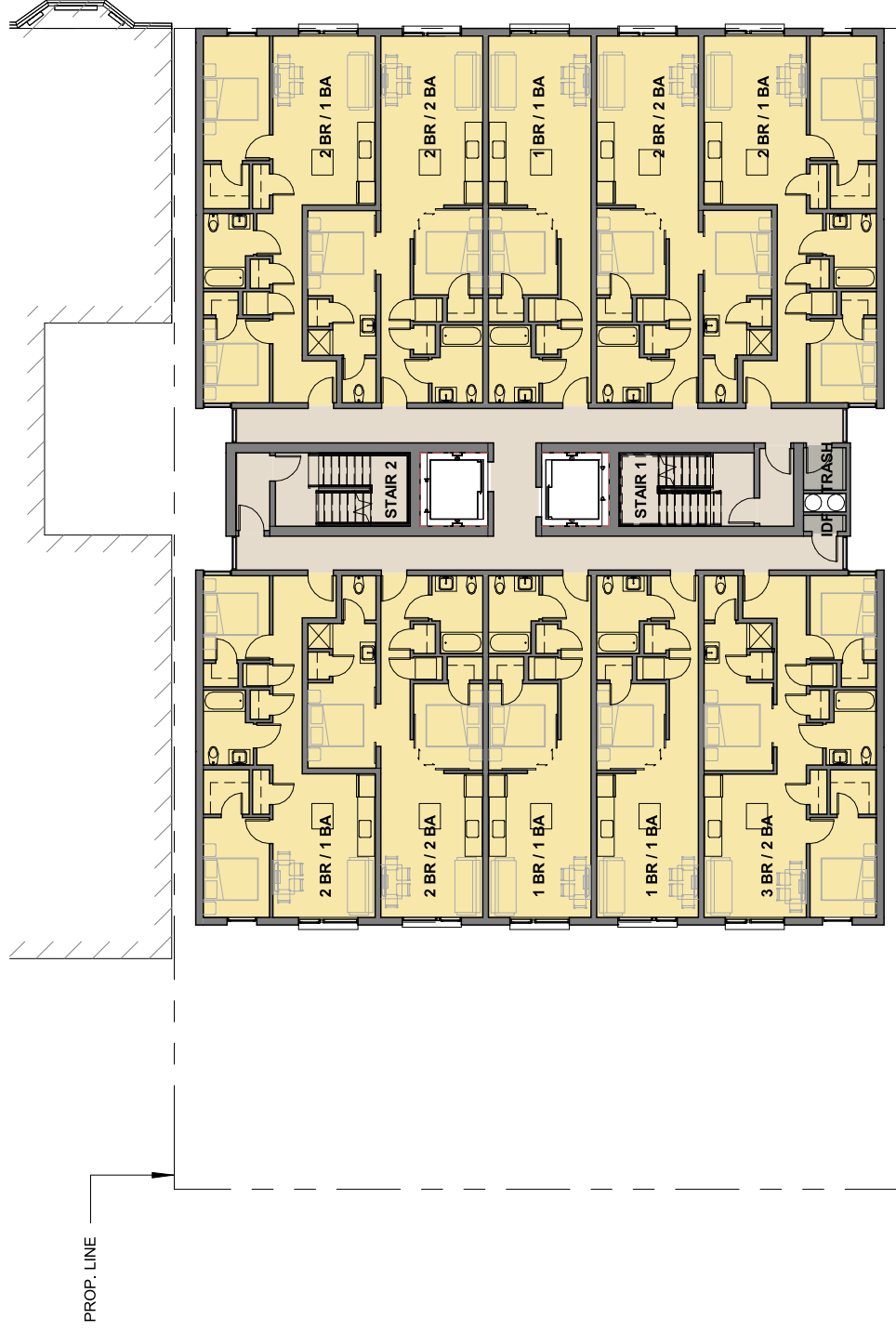


SOURCE: BRICK INC.

550 O'FARRELL STREET PROJECT

Case No. 2017-004557ENV

FIGURE 2-8: Proposed Project – Level 4 Plan

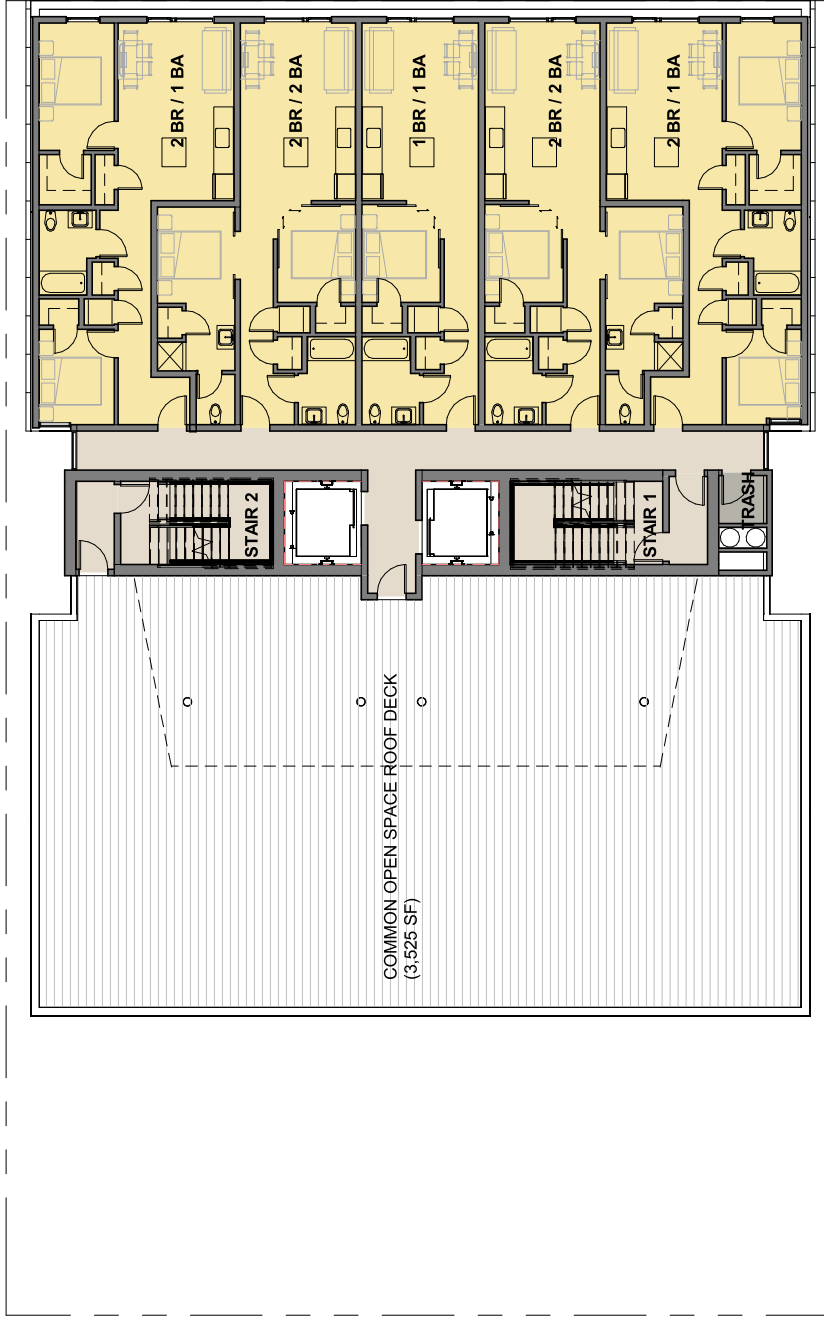


SOURCE: BRICK INC.

550 O'FARRELL STREET PROJECT

Case No. 2017-004557ENV

FIGURE 2-9: Proposed Project – Levels 5-12 Plans



SOURCE: BRICK INC.

550 O'FARRELL STREET PROJECT

Case No. 2017-004557ENV

FIGURE 2-10: Proposed Project – Level 13 Plan

Table 2-1: Proposed Project and Project Variant Characteristics

| Project Use/Space | Proposed Project Totals | Project Variant Totals |
|--|--|--|
| Lot Size | 11,800 sf | 11,800 sf |
| Residential | 78,990 sf | 81,710 sf |
| Common residential open space | 5,655 sf (excluded from gsf) | 5,655 sf (excluded from gsf) |
| Private residential open space | 480 sf (excluded from gsf) | 480 sf (excluded from gsf) |
| Retail/residential amenity space | 1,300 gsf | 1,300 gsf |
| Tenant amenity space | 2,550 gsf | 1,650 gsf |
| Other (residential lobby/mechanical) | 4,525 gsf | 4,525 gsf |
| Total¹ | 104,960 gsf | 106,515 gsf |
| Dwelling Units | 111 | 116 |
| Height of building ² (feet) | 130 feet (146 feet to top of elevator penthouse) | 130 feet (146 feet to top of elevator penthouse) |
| Number of stories | 13 | 13 |
| Bicycle parking spaces | 156 class 1 and 8 class 2 spaces | 156 class 1 and 8 class 2 spaces |

Source: Sandhill O'Farrell, LLC

Notes:

¹Totals do not add up due to rounding and some building areas being excluded from table (i.e., basement tenant storage).

²Parapets, and mechanical, stair and elevator penthouses are exempt from building heights pursuant to Planning Code section 260(b)(1)(F).

Proposed Project - Building Form and Design

The building design would include articulated front, rear, and side elevations. The building exterior would be constructed with a durable modern material, such as precast concrete, metal paneling, or an integrated composite system and include the retained façade of the existing garage, discussed below. See **Figure 2-12: Proposed Project - South (O'Farrell Street) Elevation**, p. 2-19, **Figure 2-13: Proposed Project - North Elevation**, p. 2-20, **Figure 2-14: Proposed Project - East Elevation**, p. 2-21, **Figure 2-15: Proposed Project - West Elevation**, p. 2-22, and **Figure 2-16: Proposed Project - Building Section**, p. 2-23, illustrate the overall vertical organization of building space.

The main elevation on O'Farrell Street would be organized in a vertical tripartite division similar to the surrounding buildings that comprise the Uptown Tenderloin Historic District. The base of the building would be the retained façade of the existing 550 O'Farrell Street garage, with plaster finish scored to resemble masonry, and decorative panels. **Figure 2-3: Existing Building Photograph and Building Section**, p. 2-6, also illustrates this façade. See also EIR **section 3.B, Historic Architectural Resources**, for further description of the existing façade. Level 4 would be set back three to four feet from the façade. The middle section of the building would have deep inset punched windows organized into single and vertically paired doubles, creating an offset fenestration pattern. The top of the building would be set back from the middle section by 2.5 feet.

The rear, north elevation of the building would be a two-part volume with a base and upper façade, with large punched window openings. The east and west sides of the building would be articulated as two distinct volumes straddling the core, which is recessed 4 feet to provide light and air to the lightwells of the adjacent buildings. The building core would be constructed of panel-formed concrete and exposed to the exterior at the side elevations.

Retained Elements Design Guidelines

New development that incorporates retained elements of an existing structure recognizes and maintains neighborhood character and design. The following criteria are used in determining inclusion of a retained element:

- Determine the visual contributions of an existing structure as a component of the broader neighborhood context.
- Technically evaluate the existing structure to see if it can be feasibly integrated.
- Determine the fundamental site relationships, massing, spatial, or compositional ideas found in the existing architecture.
- If a new building is proposed in lieu of the existing one, evaluate its replacement.

The application of these guidelines would not achieve conformance with the secretary's standards and would not avoid an otherwise significant adverse impact on historic architectural resources under CEQA.

The decision to retain the existing façade of the building as the base of the project is based on a recommendation by the planning department to utilize the Retained Elements Special Topic Design Guidelines (RE-STDG). On December 5, 2019, the planning commission approved a resolution to adopt the RE-STDG to be applied at the discretion of the planning and historic preservation commissions for projects that propose retention of existing building elements in new development.¹⁰ The guidelines establish methods for developers to decide when and how to retain in new development all or a portion of an existing structure "in an intentional and sensitive manner to maintain neighborhood character."¹¹

The guidelines would apply in instances where visible parts of existing buildings are incorporated into new development in all zoning districts. The guidelines are meant to work in concert with the City's urban design guidelines. Consistency with both sets of guidelines is

¹⁰ San Francisco Planning Commission. Resolution No. 20585 adopting Retained Elements Special Topic Design Guidelines. December 5, 2019.

¹¹ San Francisco Planning Department. *Designing for Context with Retained Elements: Special Topic Design Guidelines*. Review Draft. January 22, 2019.

mandatory in the planning commission approval process. These guidelines do not apply to properties identified as City landmarks or in landmark districts under planning code article 10 or to Significant or Contributory Buildings (Category I-IV) under article 11.

The planning commission further determined that the RE-STDGs are consistent with the general plan urban design element policies and objectives by encouraging new development that emphasizes characteristic patterns of individual neighborhoods, while maintaining a physical connection to the past. The RE-STDGs further recognize that buildings, when seen together, produce a total effect that characterizes the city and its districts. For historical resources, a project applicant should only use the RE-STDGs when directed by planning department staff or the HPC.

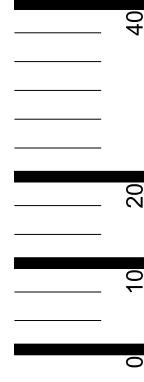
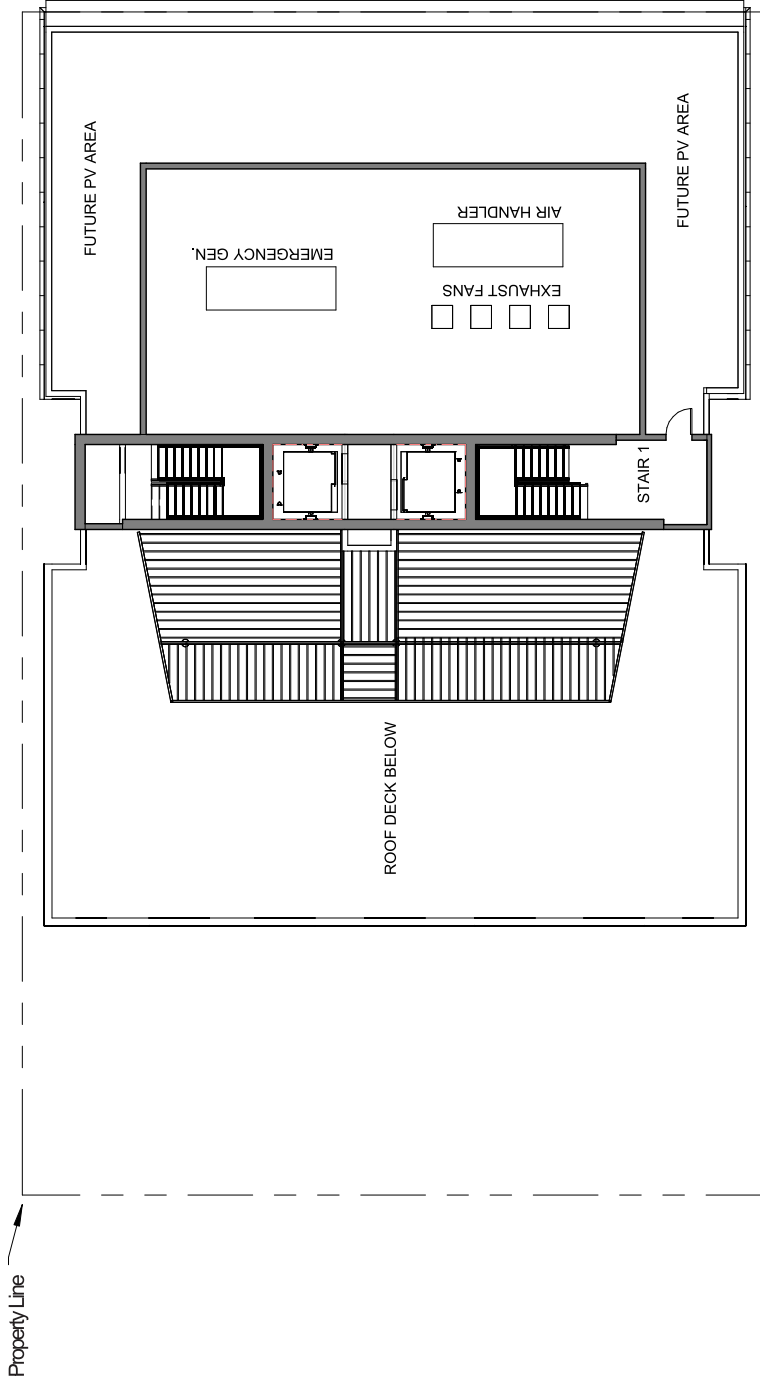
Proposed Project - Open Space and Landscaping

The proposed project would provide approximately 6,150 gsf of useable open space to the residential occupants, including 5,655 gsf of common open space and approximately 480 gsf of private open space. The common open space would consist of an approximately 2,130-sf terrace within the level 1 rear yard and an approximately 3,525-sf roof deck facing the rear yard at level 13 (see **Figure 2-5: Proposed Project - Site Plan and Ground Floor (Level 1) Plan**, p. 2-9, and **Figure 2-10: Proposed Project - Level 13 Plan**, p. 2-14); those areas would include hardscape pavers, decking, planting areas, and shade trellises. The private open space would consist of four private decks within the level 1 rear yard.

B.2 Project Variant

The project variant would demolish the existing building and construct an approximately 106,515-sf, mixed-use building with 116 dwelling units, approximately 1,300 sf of ground-floor retail/residential amenity space, and basement and ground-level space accommodating 156 class 1 bicycle parking spaces. (see **Table 2-1: Proposed Project and Project Variant Characteristics**, p. 2-15). The project variant would also include eight class 2 bicycle parking spaces along the O'Farrell Street frontage. The project variant would provide three new street trees on the O'Farrell Street sidewalk. The residential uses would occupy approximately 81,710 gsf. The dwelling unit mix would include 36 one-bedroom units, 66 two-bedroom units, and 14 three-bedroom units; 20 percent of the total units (or 23 units) would be affordable inclusionary units.

As with the proposed project, the project variant would be 13 stories tall, reaching 130 feet in height (146 feet in height to the top of the elevator penthouse). The building's parapet wall would be 2 feet in height, the mechanical and stair penthouse would be 10 feet in height, and the elevator penthouse would be 16 feet above the roofline. Parapets and mechanical, stair, and elevator penthouses are exempt from overall building height limits pursuant to planning code section 260(b)(1)(F).

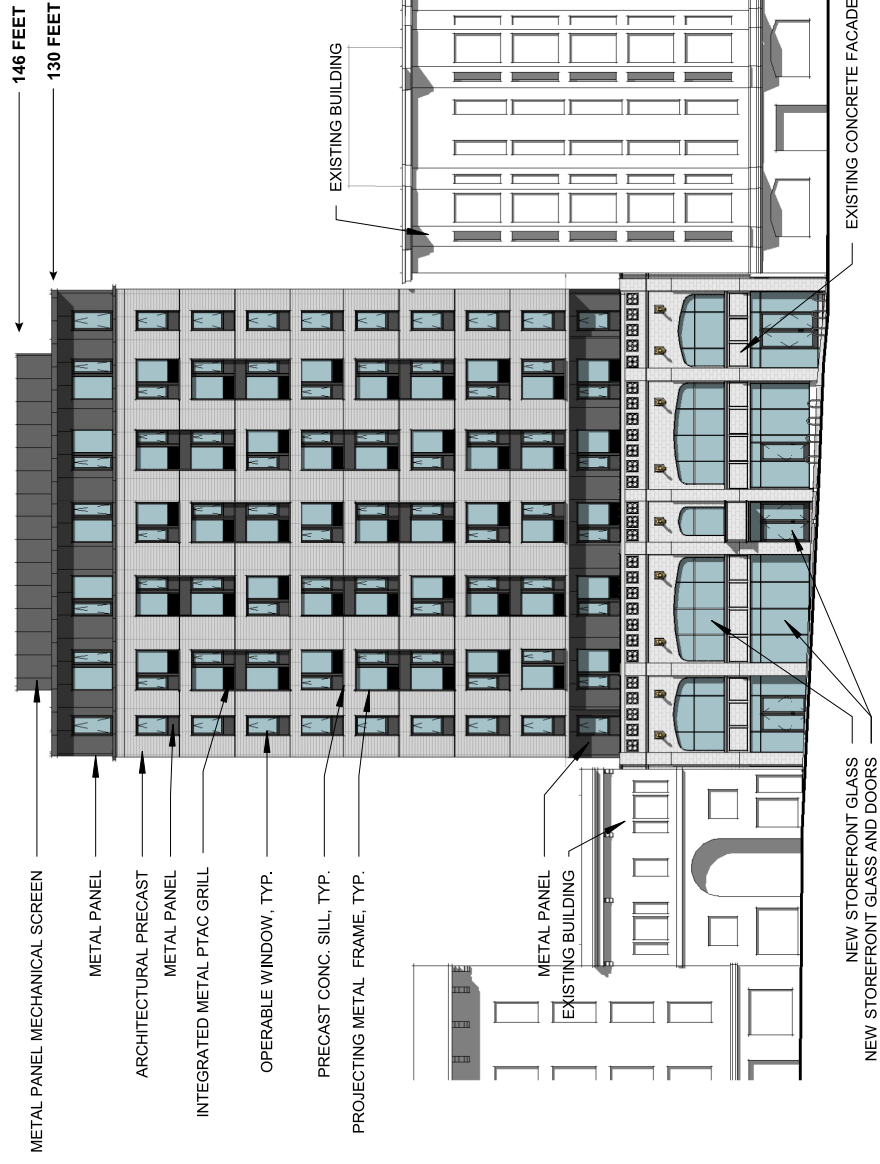


SOURCE: BRICK INC.

550 O'FARRELL STREET PROJECT

Case No. 2017-004557ENV

FIGURE 2-11: Proposed Project – Roof Plan

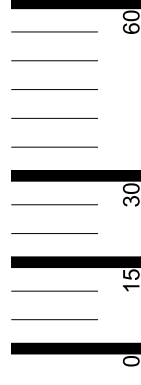


SOURCE: BRICK INC.

550 O'FARRELL STREET PROJECT

Case No. 2017-004557ENV

FIGURE 2-12: Proposed Project – South (O'Farrell Street) Elevation

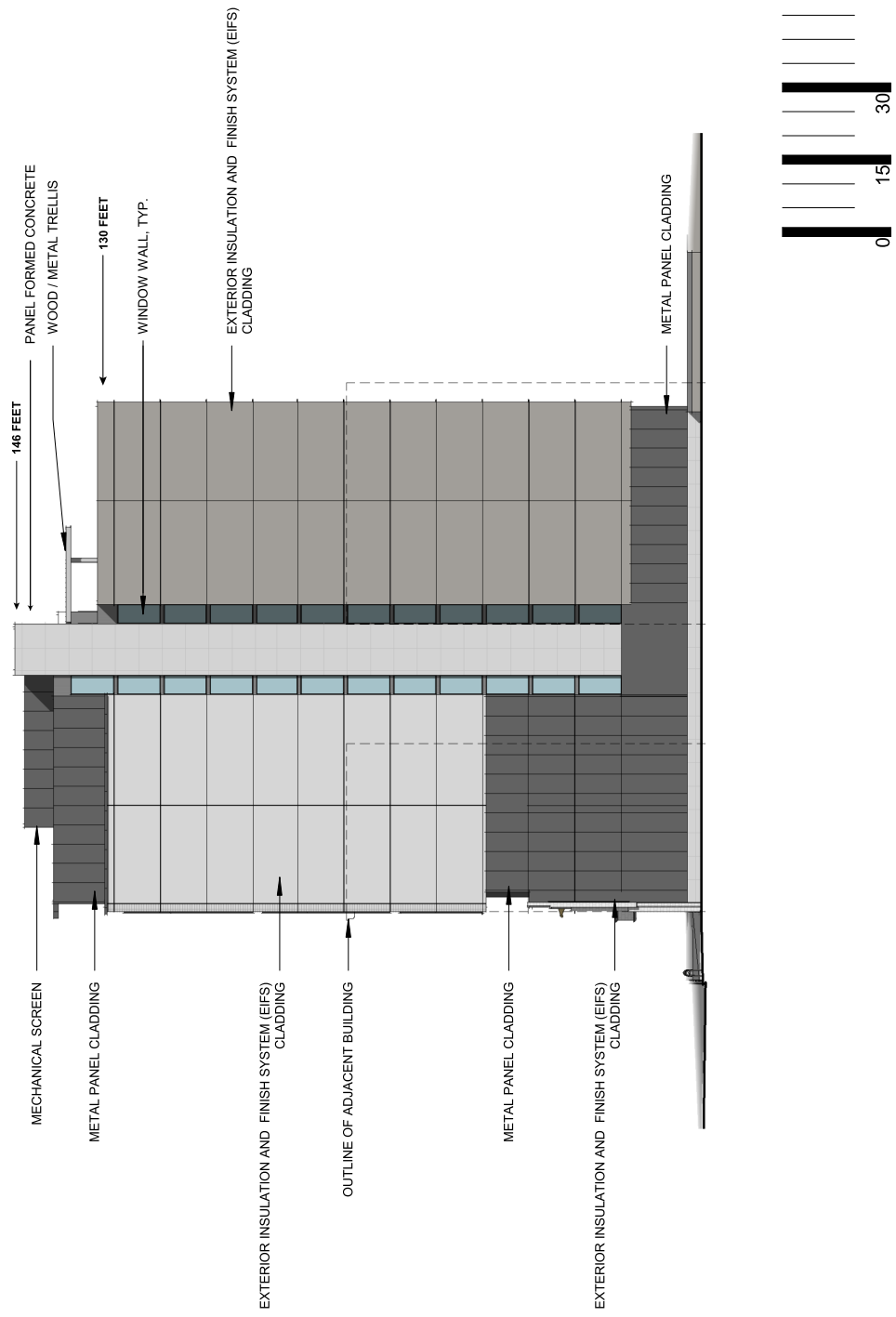


SOURCE: BRICK INC.

550 O'FARRELL STREET PROJECT

Case No. 2017-004557ENV

FIGURE 2-13: Proposed Project – North Elevation

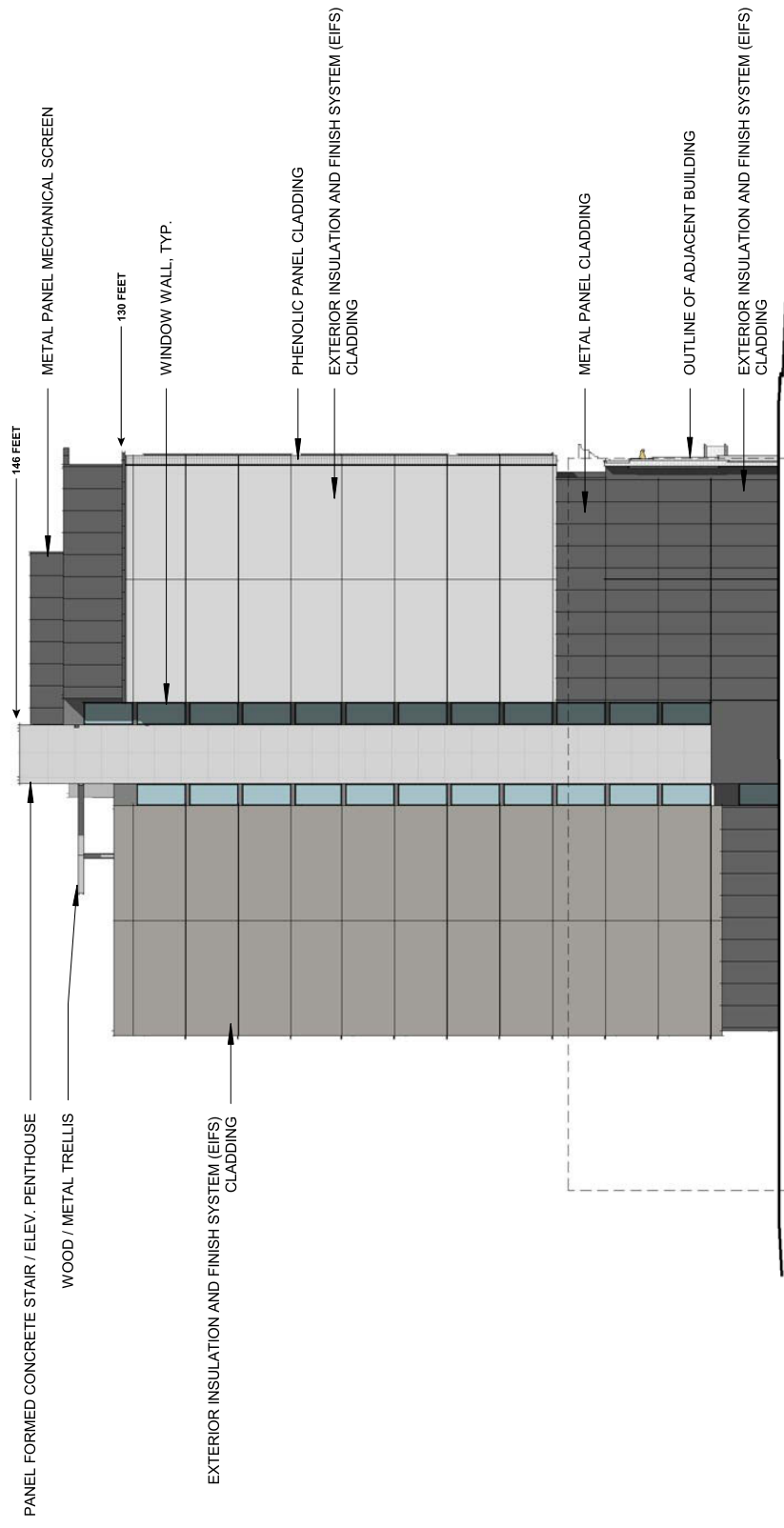


SOURCE: BRICK INC.

550 O'FARRELL STREET PROJECT

Case No. 2017-004557ENV

FIGURE 2-14: Proposed Project – East Elevation

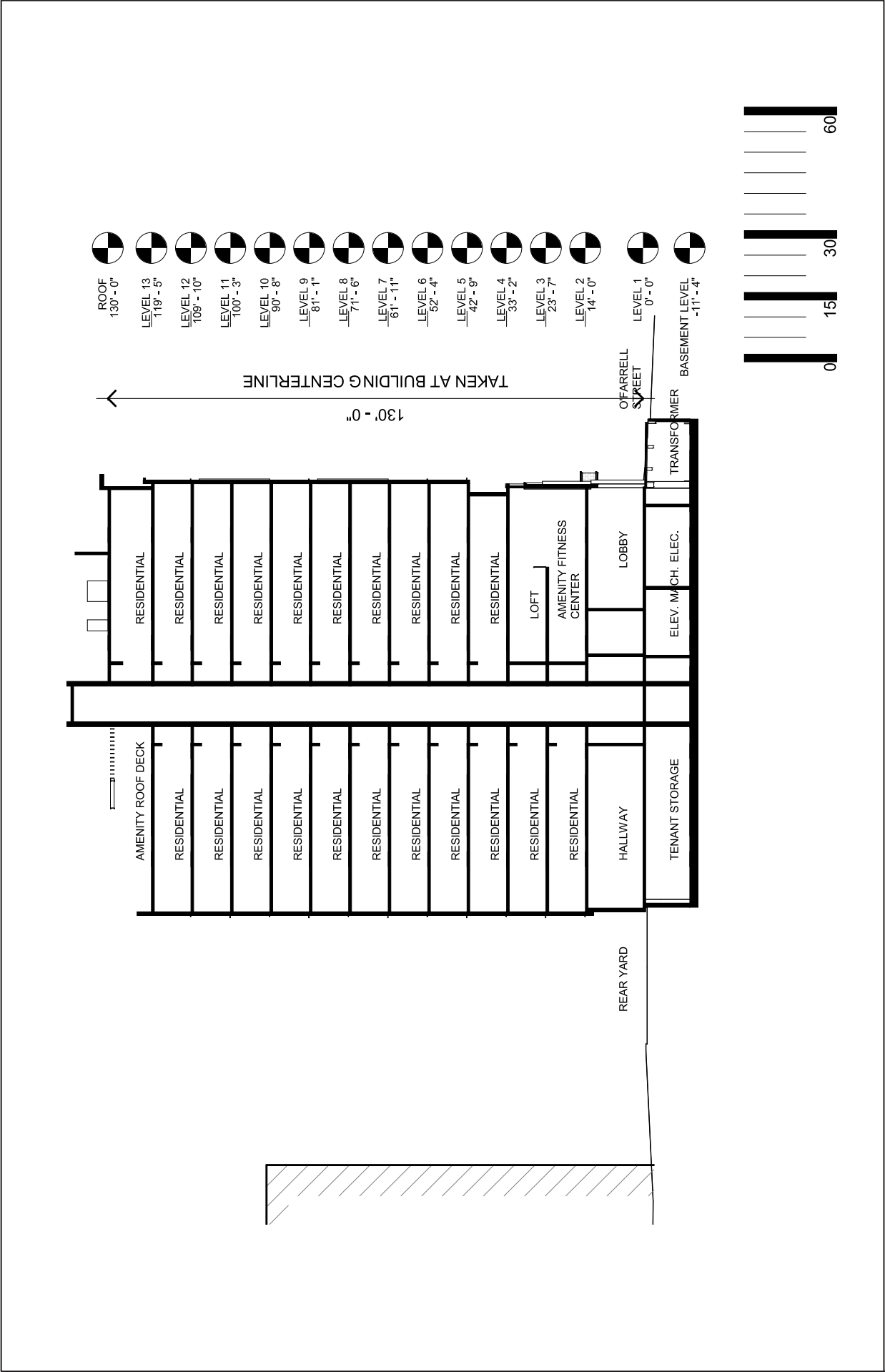


SOURCE: BRICK INC.

550 O'FARRELL STREET PROJECT

Case No. 2017-004557ENV

FIGURE 2-15: Proposed Project – West Elevation



SOURCE: BRICK INC.

550 O'FARRELL STREET PROJECT

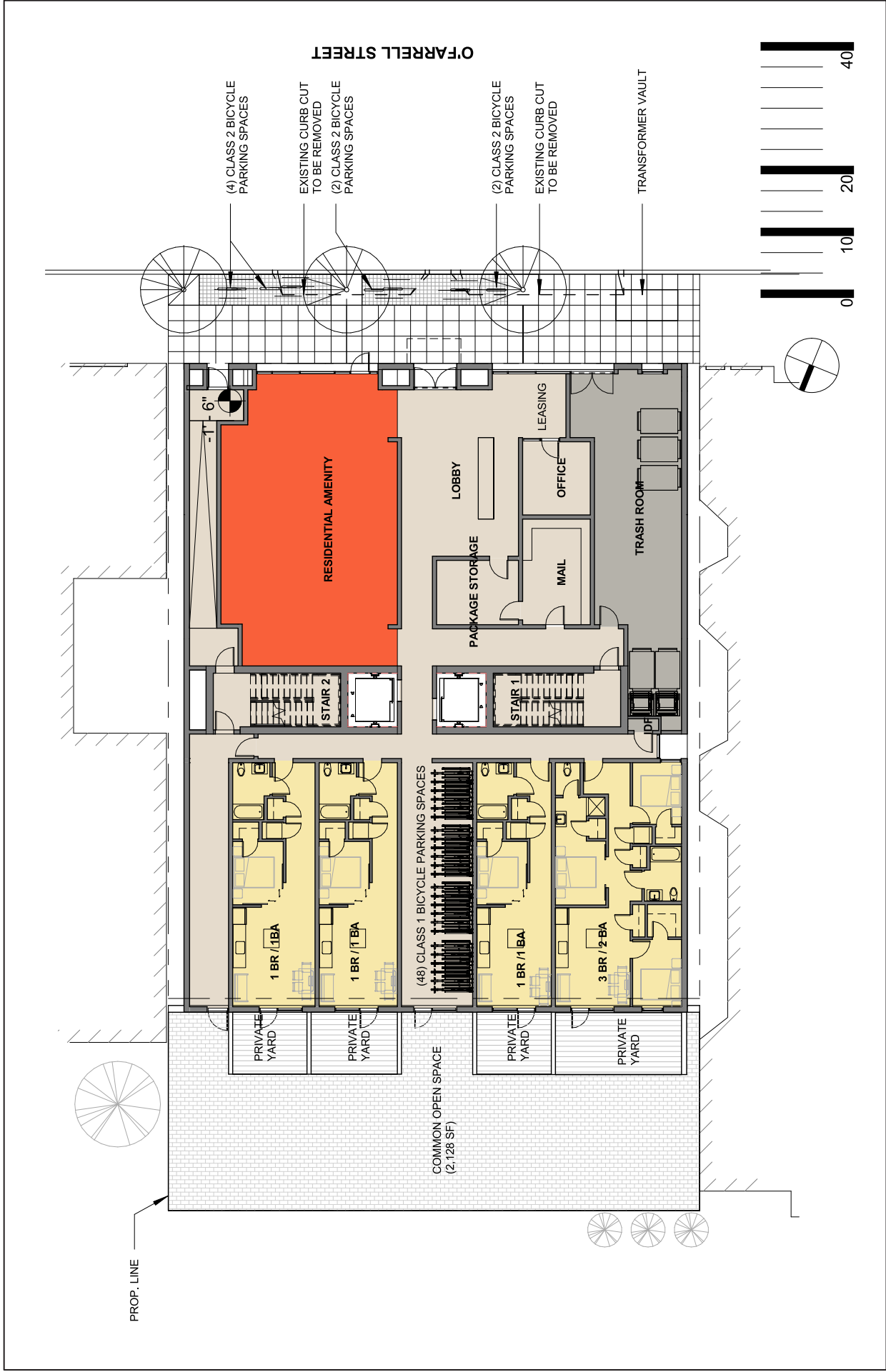
Case No. 2017-004557ENV

FIGURE 2-16: Proposed Project – Building Section

The basement level of the project variant would include a bicycle storage room with 108 class 1 bicycle parking spaces, tenant storage, and mechanical space. This would be similar to the proposed project basement level. The basement level would include a transformer vault below part of the O'Farrell Street sidewalk. The existing 550 O'Farrell Street building includes basement level space below the sidewalk that would be partially filled for the project variant (see **Figure 2-4: Proposed Project - Basement Level Plan**, p. 2-8). The project variant ground floor (level 1) would contain four residential units (3 one-bedroom units and 1 three-bedroom unit), retail/residential amenity space, residential lobby, leasing office, mechanical space, and 48 class 1 bicycle parking spaces (**Figure 2-17: Project Variant - Site Plan and Ground Floor (Level 1) Plan**, p. 2-25). The retail/residential amenity space, in the southeast corner of the ground floor, and the residential lobby would be accessed from separate entrances fronting O'Farrell Street.

The 116 residential units would be on levels 1 through 13. As previously noted, level 1 would contain four residential units facing the rear yard. Level 2 would include seven residential units (2 one-bedroom, 2 two-bedroom, and 3 three-bedroom units) and a 1,650-sf fitness center/amenity space (see **Figure 2-18: Project Variant - Level 2 Plan**, p. 2-27). The remaining 105 units (one-, two-, and three-bedroom units) would be located on levels 3 through 13 (see **Figure 2-19: Project Variant - Level 3 Plan**, p. 2-28, **Figure 2-20: Project Variant - Level 4 Plan**, p. 2-29, and **Figure 2-21: Project Variant - Levels 5-12 Plans**, p. 2-30). Level 13 would be similar to the proposed project on **Figure 2-10: Proposed Project - Level 13 Plan**, p. 2-14, and would include 3,525 sf of common residential open space.

A diesel-powered combustion engine backup generator equipped with best available control technology for emissions control would be installed on the roof within the enclosed mechanical penthouse structure, similar to the proposed project on **Figure 2-11: Proposed Project – Roof Plan**, p. 2-18. The generator would supply emergency power for exit lighting, fire alarm, fire pumps, smoke-control systems, and other loads such as security systems. Other rooftop equipment would include a cooling tower, exhaust fans, and heat pumps.



SOURCE: BRICK INC.

550 O'FARRELL STREET PROJECT

Case No. 2017-004557ENV

FIGURE 2-17: Project Variant – Site Plan and Ground Floor (Level 1) Plan

Project Variant - Building Form and Design

The building exterior would be constructed with a durable modern material, such as precast concrete, metal paneling or an integrated composite system. The three-story base of the O'Farrell Street elevation would have terra-cotta facing (**Figure 2-22: Project Variant - South (O'Farrell Street) Elevation**, p. 2-31). The main elevation on O'Farrell Street would be organized in a vertical tripartite division similar to the surrounding buildings that compose the Uptown Tenderloin Historic District. Level 4 would be set back about 3 feet from the level 3 façade. The middle section of the building would have deep inset punched windows organized into single and vertically paired doubles, creating an offset fenestration pattern. The top of the building would be set back from the middle section by 2.5 feet.

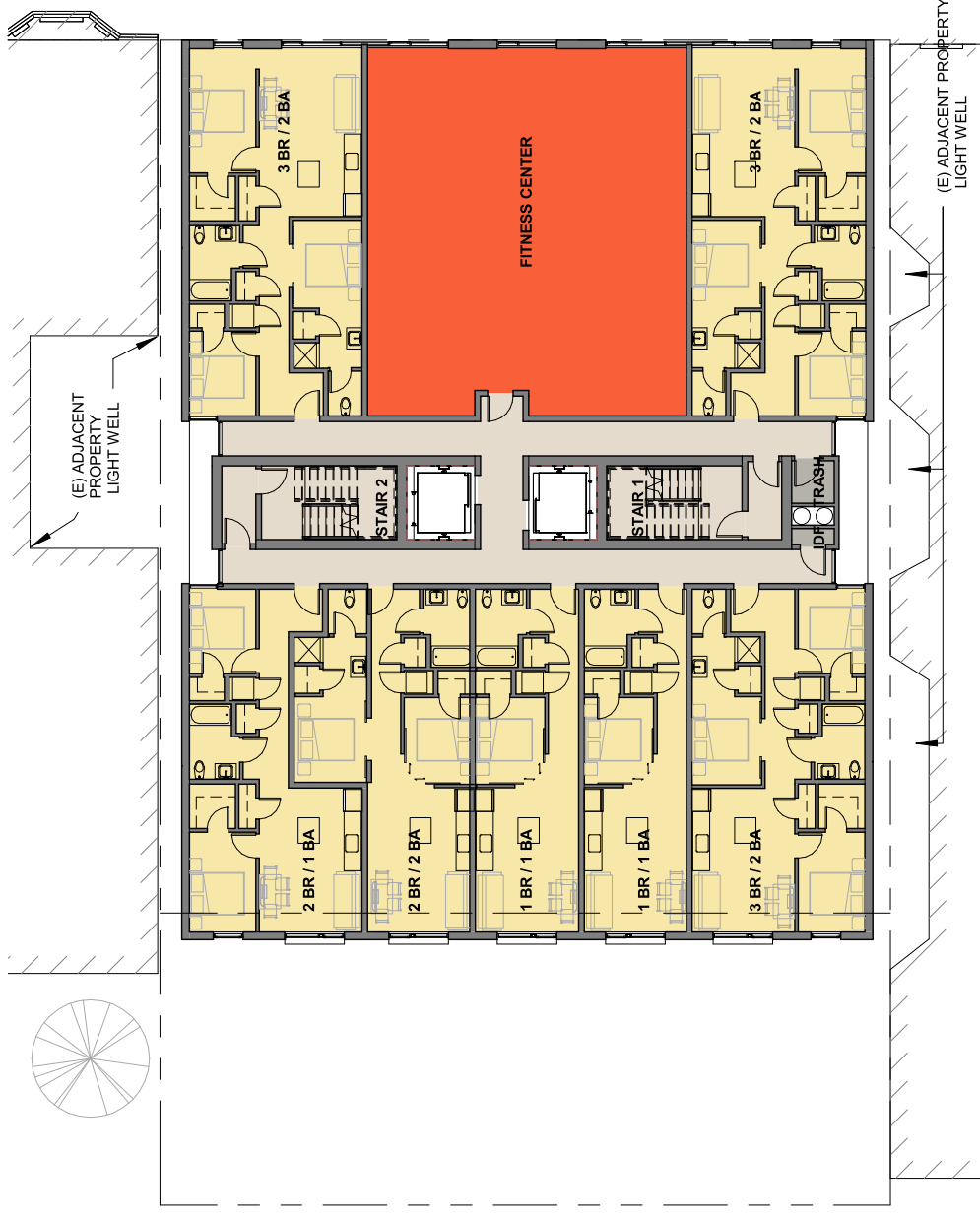
The rear north elevation of the project variant would be a two-part volume with a base and upper façade, with large punched window openings similar to the proposed project on **Figure 2-13: Proposed Project - North Elevation**, p. 2-20. The east and west sides of the building would be articulated as two distinct volumes straddling the core, which is recessed 4 feet to provide light and air to the lightwells on the adjacent buildings. Those elevations would have minor differences at the southeast and southwest corners compared to the proposed project elevations, which have elements of the retained façade visible, but overall would be similar to **Figure 2-14: Proposed Project - East Elevation**, p. 2-21, and **Figure 2-15: Proposed Project - West Elevation**, p. 2-22. The building core would be constructed of panel-formed concrete and exposed to the exterior at the side elevations. **Figure 2-23: Project Variant - Building Section**, p. 2-32, illustrates the overall vertical organization of the building.

Project Variant - Open Space and Landscaping

The project variant would provide approximately 6,150 gsf of useable open space to the residential occupants, including 5,650 gsf of common open space and approximately 480 gsf of private open space. The common open space would consist of an approximately 2,130-sf terrace within the level 1 rear yard (see **Figure 2-17: Project Variant - Site Plan and Ground Floor (Level 1) Plan**, p. 2-25) and an approximately 3,525-sf roof deck, similar to the proposed project on **Figure 2-10: Proposed Project - Level 13 Plan**, p. 2-14; those areas would include hardscape pavers, decking, planting areas, and shade trellises. The private open space would consist of four private decks within the level 1 rear yard.

Proposed Project and Project Variant - Access and Bicycle Parking

Pedestrian access to the residential lobby and retail space/residential amenity would be from separate entrances along O'Farrell Street. As previously described, the proposed project would provide 156 class 1 bicycle spaces distributed across the basement and ground levels. and eight class 2 bicycle spaces on the O'Farrell Street sidewalk. Two existing approximately 26- to 28-foot-wide curb cuts on O'Farrell Street would be removed. Pedestrian access to the basement bicycle storage would be via elevators serving all floors of the new building. The proposed project and project variant would not provide any vehicle parking.



SOURCE: BRICK INC.

550 O'FARRELL STREET PROJECT

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FIGURE 2-18: Project Variant – Level 2 Plan

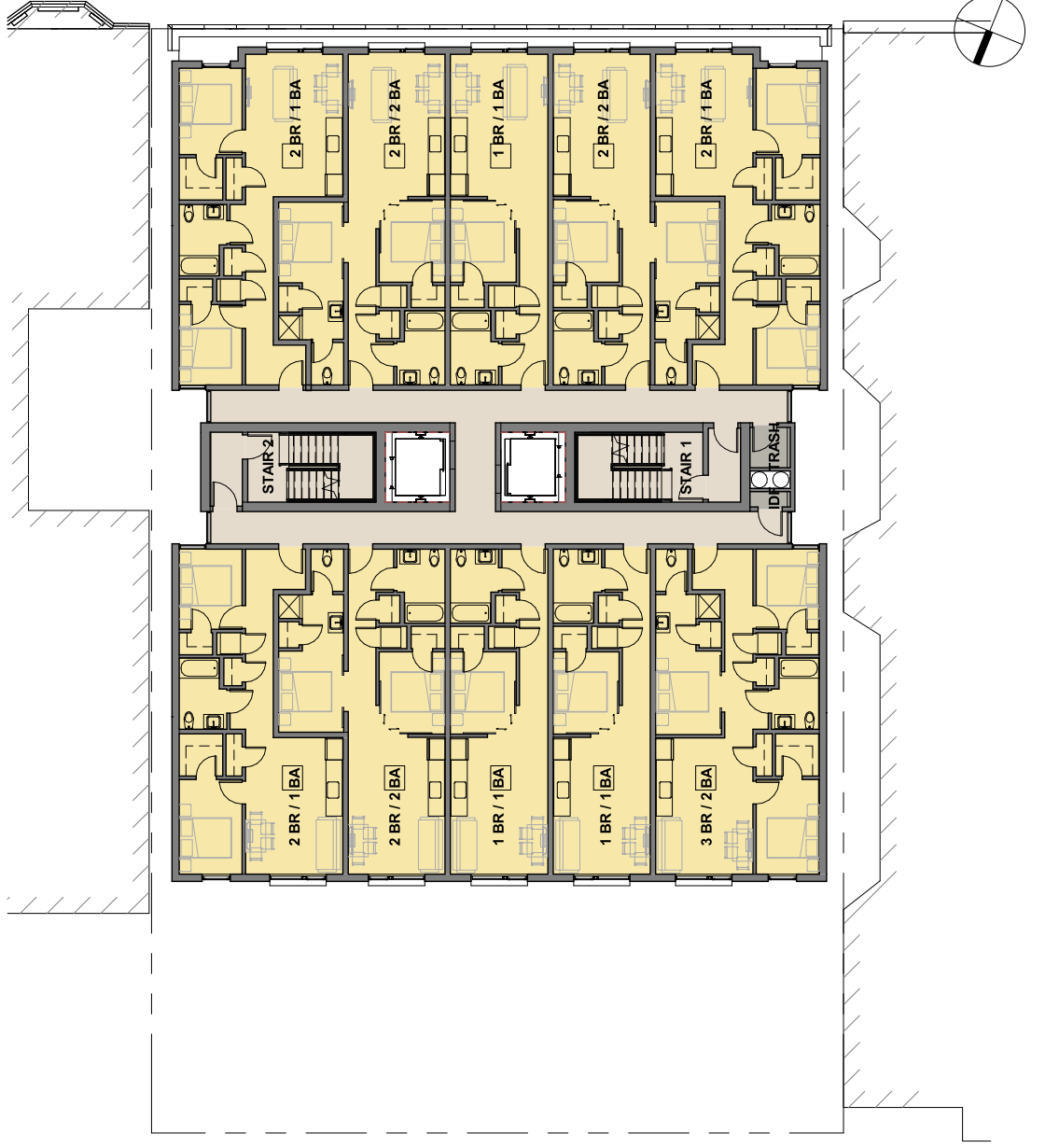


SOURCE: BRICK INC.

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Case No. 2017-004557ENV

FIGURE 2-19: Project Variant – Level 3 Plan

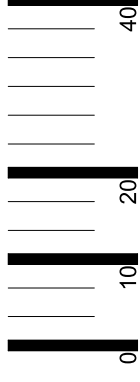
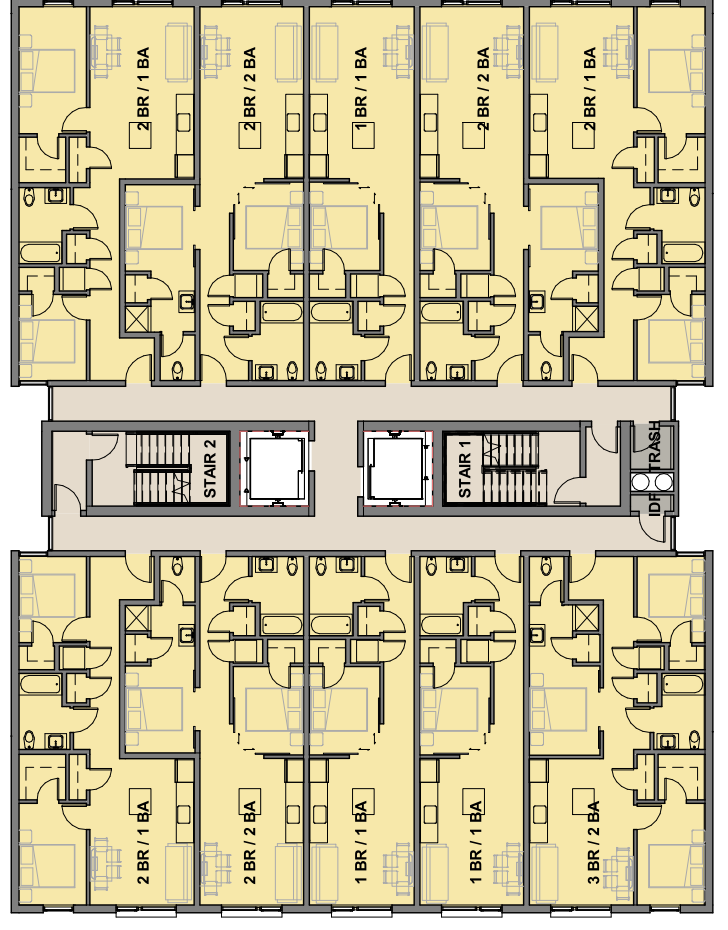


SOURCE: BRICK INC.

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FIGURE 2-20: Project Variant – Level 4 Plan



SOURCE: BRICK INC.

550 O'FARRELL STREET PROJECT

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FIGURE 2-21: Project Variant – Levels 5-12 Plan



SOURCE: BRICK INC.

550 O'FARRELL STREET PROJECT

Case No. 2017-004557ENV

FIGURE 2-22: Project Variant – South (O'Farrell Street) Elevation

SOURCE: BRICK INC.

550 O'FARRELL STREET PROJECT

Case No. 2017-004557ENV

FIGURE 2-23: Project Variant – Building Section

Proposed Project and Project Variant - Demolition and Construction

The proposed project or project variant would have an estimated 4.5-foot-deep excavation along the front half of the building (accounting for the existing garage basement depth) to a total depth of 16 feet below sidewalk grade, and 11-foot-deep excavation along part of the north end of the existing basement (see **Figure 2-3: Existing Building Photograph and Building Section**, p. 2-6; **Figure 2-16: Proposed Project - Building Section**, p. 2-23, and **Figure 2-21: Project Variant - Levels 5-12 Plans**, p. 2-30). This would remove enough soil for the new mat slab foundation. Up to approximately 2,200 cubic yards of soil would be removed from the proposed project site, and about 500 cubic yards of imported material would be used as backfill to level the rear yard open space and the portion of the existing sidewalk vault that would not be retained. The excavated material would be exported off site.

Alternatively, the proposed project or the project variant would not backfill any of the existing basement space and would instead extend the 11-foot-deep excavation to the north property line creating an additional 1,110 cubic yards of soil to be removed from the site. That space would be developed into additional tenant storage or other service space. Total excavation would then be about 3,300 cubic yards. As shown on **Figure 2-5: Proposed Project - Site Plan and Ground Floor (Level 1) Plan**, p. 2-9, and **Figure 2-17: Project Variant - Site Plan and Ground Floor (Level 1) Plan**, p. 2-25, both the proposed project and project variant would include a landscaped rear yard above the backfilled area or above the full basement. (Proposed project and project variant plans herein assume the backfill option would be implemented.). In addition, the proposed project or the project variant would backfill about 330 cubic yards at the east end of the existing sidewalk vault.

Minor reconstruction of sidewalks along the project frontage would also be necessary. No trees would be removed to accommodate project construction; however, proposed project improvements include planting three street trees along O'Farrell Street.

The project sponsor anticipates that construction would begin in spring 2021, span approximately 21 months and be conducted in three phases: (1) demolition, (2) excavation and shoring, and (3) construction. Demolition would last approximately one month, excavation and shoring approximately two months, and construction approximately 18 months. Heavy construction equipment, such as front loaders, backhoes, drilling equipment, tractors, graders, and trucks would be used for the project. In addition, jackhammers, cranes, pumps, and generators (to a limited degree) would be used. Pile driving is not currently proposed as the proposed project would use a mat slab foundation system, which does not require pile driving. However, if piles were to be required, the project sponsor would implement torque-down piles that do not generate excessive noise or vibration. Proposed project construction would require the temporary removal of the sidewalk along O'Farrell Street, with pedestrian traffic redirected to a protected temporary sidewalk occupying the parking lane.

C. REQUIRED PROJECT APPROVALS AND PERMITS

The proposed 550 O'Farrell Street project or project variant would require the following approvals from the City and County of San Francisco:

Actions by the Planning Commission

- Approval of a conditional use authorization to construct a building exceeding a height of 50 feet in an RC zoning district (Planning Code section 253) and exceeding a height of 80 feet in an 80-T-130-T height and bulk district (Planning Code section 263.7).
- Approval of a conditional use authorization to exceed building bulk limits (Planning Code section 270); the project would seek to increase the maximum allowed diagonal dimension at the setback height established pursuant to Planning Code section 132.2 from 125 feet to 130 feet.

Actions by the Zoning Administrator

- Approval of a rear yard modification (Planning Code section 134) and dwelling unit exposure variance (Planning Code section 140) to reduce the depth of the rear yard from approximately 34 feet to approximately 31 feet.

Actions by Other City Departments and Government Agencies

- Approval of demolition, grading, and building permits (Department of Building Inspection).
- Waiver of requirement for four street trees and payment of an in-lieu fee, to provide three street trees on the O'Farrell Street sidewalk (Department of Public Works).
- Approval of an encroachment permit to install the transformer vault below part of the O'Farrell Street sidewalk (Department of Public Works).
- Approval of a request for color curb and on-street parking changes on O'Farrell Street (San Francisco Municipal Transportation Agency).
- Approval of a Stormwater Control Plan and project compliance with the Stormwater Design Guidelines (San Francisco Public Utilities Commission).
- Approval of project compliance with the Maher Ordinance prior to the commencement of any excavation work and approval of any soil mitigation plan as may be required (San Francisco Department of Public Health).
- Approval of a San Francisco Health Code article 38 ventilation plan prior to submitting plans for a mechanical permit (San Francisco Department of Public Health and Department of Building Inspection).
- Issuance of a certification of registration for a diesel backup generator (San Francisco Department of Public Health).

- Approval of a permit for the installation, operation, and testing of a diesel-powered backup generator (Bay Area Air Quality Management District).

D. PROJECT SETTING

As previously described, the project site is located within an RC-4 (Residential-Commercial, High Density) zoning district, 80-T-130-T height and bulk district, and the North of Market Residential Special Use District No. 1. The land uses surrounding the project site consist primarily of mixed-use residential-commercial-retail buildings with high-density residences situated above commercial space. Other uses common in the area include small food and beverage stores and restaurants. Institutional uses are also nearby; Glide Memorial United Methodist Church is located two blocks southeast of the project site on Ellis Street between Jones and Taylor streets.

Buildings in the project vicinity vary widely in height, ranging from single-story (30-foot-tall) retail buildings to a 24-story apartment building on the 600 block of O'Farrell Street. The Union Square hotel and retail area, about two blocks to the east, includes a range of structures. The 30-story (approximately 400-foot-tall) Westin St. Francis Hotel is four blocks northeast of the project site. The 46-story Hilton Union Square is two blocks east of the project site on O'Farrell Street at Taylor Street. Structures along Jones Street are mostly two- to six-story (40- to 80-foot-tall) hotel or residential uses with ground-level restaurants, parking, and commercial uses. Three blocks to the west and three blocks to the east, the buildings along Geary Street are typically six stories (80 feet tall). Most nearby structures are two to seven stories in height, or about 40 to 90 feet tall. Nearly all structures extend to the lot line with no front setbacks. Vegetation in the area is generally limited to street trees. The nearest park/open space facilities to the project site are Boeddeker Park at Eddy and Jones streets, the Tenderloin Children's Recreation Center on Ellis Street between Leavenworth and Hyde streets, and Sgt. John Macaulay Park, at Larkin and O'Farrell streets, each located two to three blocks from the project site.

O'Farrell Street has two one-way eastbound travel lanes and a dedicated bus lane. O'Farrell Street between Franklin Street and Market Street is a one-way eastbound pair with westbound Geary Street. O'Farrell Street also provides access from Van Ness Avenue (U.S. 101) and Interstate 80 (I-80).

As noted above, the 550 O'Farrell Street garage that currently occupies the project site includes 119 vehicle parking spaces available for public use. Additional parking facilities within 500 feet of this garage include three parking garages on Eddy Street, Ellis Street, and Jones Street, respectively, as well as a surface lot on Eddy Street. On-street parking is available on the north and south sides of O'Farrell Street. The project vicinity has moderate pedestrian foot traffic. There are no dedicated bicycle lanes on adjacent streets. The closest bicycle routes are westbound along Sutter Street and eastbound on Post Street.

Muni bus lines in the area include routes 38R Geary Rapid and 38 Geary along O'Farrell and Geary streets; 27 Bryant along Jones and Leavenworth streets; 2 Clement and 3 Sutter along Post and Sutter streets; 47 Van Ness and 49 Van Ness-Mission along Van Ness Avenue; and 19 Polk along Polk Street. Other nearby transit includes the Muni California Street cable car from Market Street to Van Ness Avenue six blocks north of the project site. Bay Area Rapid Transit and Muni Metro subway lines also serve the area at the Powell station, approximately 0.5 miles southeast on Market Street.

E. PROJECT SPONSOR'S OBJECTIVES

The project sponsor, Sandhill O'Farrell, LLC, seeks to achieve the following objectives by undertaking the proposed 550 O'Farrell Street Project:

1. Develop a high-density mixed-income residential development consistent with the purposes of the North of Market Residential Special Use District by fully using the site's zoning capacity of up to 118 dwelling units, within project site constraints, and incorporating on-site affordable units.
2. Replace an outdated private parking garage with a mix of uses compatible with the surrounding Tenderloin neighborhood.
3. Contribute to the city's goal of creating 30,000 additional housing units in an area identified in the General Plan for high density housing in close proximity to downtown and local and regional public transportation.
4. Construct a new building that is compatible with the character of the Uptown Tenderloin Historic District.
5. Provide adequate light and air to all housing units in the new building.
6. Develop a project that is financially feasible and able to support the equity and debt returns required by investors and lenders to finance multi-family residential developments.

F. INTENDED USES OF THE EIR

An EIR is an informational document that is intended to inform the public and the decision makers of the environmental consequences of a proposed project, and project variant in this case, and to present information about measures and feasible alternatives to avoid or reduce the environmental effects of the proposed project or project variant. It examines the potential significant physical environmental impacts that could result from the proposed project or project variant. This EIR provides the environmental information and evaluation necessary for decision-makers to adopt and implement the proposed 550 O'Farrell Street Project or its proposed variant. This Draft EIR has been prepared by the City and County of San Francisco pursuant to the

California Environmental Quality Act (CEQA) (California Public Resources Code section 21000 et seq. and California Code of Regulations Title 14, sections 15000 et seq., “CEQA Guidelines”).

This EIR is a project-level EIR. That is, it analyzes implementation of the proposed project or project variant at a project-specific level. Before any discretionary project approvals may be granted for the project or project variant, the San Francisco Planning Commission Planning Commission) must certify the EIR as adequate, accurate, and objective. This EIR will undergo a public comment period (from May 21, 2020 to July 7, 2020) as noted on the cover of this EIR, during which time the planning commission will hold a public hearing on the EIR. Following the close of the public comment period, the planning department will prepare and publish a Responses to Comments document, containing all substantive comments received on the EIR and the Planning Department’s responses to those comments.

The Responses to Comments document may also contain specific changes to the EIR text and/or figures. The EIR, together with the Responses to Comments document, including revisions to the EIR, if any, will be considered for certification by the planning commission at a public hearing and certified as a Final EIR if deemed adequate, accurate, and objective. As noted, no approvals or permits may be issued prior to certification of the Final EIR.

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3. ENVIRONMENTAL SETTING AND IMPACTS

A. INTRODUCTION

A.1 Overview

This chapter provides a project-level impact analysis of the physical environmental impacts of implementing the 550 O'Farrell Street Project (proposed project or the project variant) as described in **chapter 2, Project Description**. This chapter describes the environmental setting, assesses impacts (off-site, on-site, construction-related, operational, direct, and indirect) and cumulative impacts, and identifies mitigation measures that would reduce or avoid identified significant environmental impacts.

A.2 Scope of Analysis

Sandhill O'Farrell, LLC, the project sponsor, filed an environmental review application on August 30, 2017 and a project application on September 1, 2017. The CEQA environmental review process provides an opportunity for the public to review and comment on the proposed project's potential environmental effects and to further inform the environmental analysis. The San Francisco Planning Department (planning department) determined that an EIR was required and published a Notice of Preparation (NOP) of an EIR announcing this requirement on March 6, 2019, and requested that agencies and interested parties comment on environmental issues that should be addressed in the EIR. As discussed in section G of the Initial Study, the NOP was filed with the County Clerk at a later date, June 10, 2019, and the comment period was extended to July 10, 2019. The planning department then prepared an Initial Study (IS), included in Appendix A. The IS considered whether the proposed project or project variant would result in significant impacts. The IS concluded that the proposed project or project variant would not result in significant effects, with the exception of historic architectural resources. The proposed project or project variant would not result in significant environmental effects in the following topical areas: land use and land use planning, aesthetics, population and housing, cultural resources (as it pertains to archeological resources), tribal cultural resources, transportation and circulation, noise, air quality, greenhouse gas emissions, wind, shadow, recreation, utilities and services systems, public services, biological resources, geology and soils, hydrology and water quality, hazards and hazardous materials, mineral resources, energy, agriculture and forest resources, and wildfire.

As noted above, the IS determined that the proposed project or project variant could result in potentially significant impacts on Historic Architectural Resources (section B).

A.3 Approach to Cumulative Analysis

Section 15130 of the CEQA Guidelines stipulates that EIRs must consider the significant environmental effects of a proposed project as well as “cumulative impacts.” A cumulative impact is defined as an impact that is created as a result of the combination of the project evaluated in the EIR together with other projects that cause related impacts (CEQA Guidelines Section 15355). As stated in the CEQA Guidelines, Section 15130(a)(1), the cumulative impacts discussion in an EIR need not discuss impacts that do not result in part from the project evaluated in the EIR. Cumulative impacts may be analyzed by considering a list of past, present, and probable future projects that produce related or cumulative impacts (CEQA Guidelines Section 15130(b)(1)(A)).

The approach used to determine an appropriate list of projects considered in an individual project’s cumulative analysis is explained in the discussion of cumulative impacts for historic architectural resources in this EIR. As of publication of the NOP and initial study (see **Appendix A** of this EIR), there were eighteen development, renovation, and/or change-of-use projects in the Uptown Tenderloin Historic District. See the description of cumulative projects in **Table 3-1: Proposed, Ongoing, and Completed Projects in the Uptown Tenderloin Historic District**, p. 3-22.

A.4 CEQA Methodological Requirements

CEQA Guidelines section 15151 describes standards for the preparation of an adequate EIR. Specifically, the standards under section 15151 are listed below.

- An EIR should be prepared with a sufficient degree of analysis to provide decision-makers with information that enables them to make a decision that intelligently takes into account environmental consequences.
- An evaluation of the environmental impacts of a project need not be exhaustive; rather, the sufficiency of an EIR is to be reviewed in light of what is reasonably feasible.
- Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts.

In practice, the above points indicate that EIR preparers should adopt a reasonable methodology upon which to estimate impacts. This approach means making reasonable assumptions using the best information available. In some cases, typically, when information is limited or where there are possible variations in project characteristics, EIR preparers will employ a “reasonable worst-case analysis” in order to capture the largest expected potential change from existing baseline conditions that may result from implementation of a project.

A.5 Format of the Environmental Analysis

The environmental topic considered in this section, Historical Architectural Resources, includes an introduction, a discussion of the environmental setting, regulatory framework, and impacts and mitigation measures. The information provided in each section is as follows:

Introduction

This subsection includes a brief description of the types of impacts that are analyzed, as well as a summary of the impacts that were scoped out in the IS; that is, impacts that were determined to result in a less-than-significant impact.

Environmental Setting

This subsection presents a description of the existing, baseline physical conditions of the project site and surroundings (e.g., existing land uses, building descriptions), at the time of issuance of the NOP in sufficient detail and breadth to allow a general understanding of the environmental impacts of the proposed project.

Regulatory Framework

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

Impacts and Mitigation Measures

This subsection evaluates the potential for the proposed project or project variant to result in adverse effects on the existing physical environment. The significance criteria for evaluating environmental impacts are defined at the beginning of the impact analysis section, followed by the approach to analysis, a discussion of the impacts of the proposed project, and mitigation measures, if required. Project-specific impacts are discussed first, followed by cumulative analysis.

A.6 Determination of Impact Significance

Under CEQA, a significant effect is defined as a substantial, or potentially substantial, adverse change in the environment. The guidelines implementing CEQA direct that this determination be based on scientific and factual data, including the entire record for the project, and not on argument, speculation, or unsubstantiated evidence. The significance thresholds (or criteria) used in this EIR are based on the planning department's Environmental Planning Division guidance regarding the thresholds of significance used to assess the severity of environmental impacts of the proposed project. EP guidance is based on CEQA Guidelines Appendix G, with procedures as set forth in San Francisco Administrative Code chapter 31.10. The significance thresholds used to analyze an environmental resource topic are presented in **section 3.B** before the discussion of impacts. The impacts of the proposed project and project variant are organized into separate

categories based on the criteria listed in each topical section. Project-specific impacts are discussed first, followed by cumulative analysis.

The categories used to designate impact significance are described as follows:

- **No Impact.** A no-impact conclusion is reached if there is no potential for impacts or the environmental resource does not occur within the project area or the area of potential effects.
- **Less-than-Significant Impact.** This determination applies if the impact does not exceed the defined significance criteria or would be eliminated or reduced to a less-than-significant level through compliance with existing local, state, and federal laws and regulations. No mitigation is required for impacts determined to be less than significant.
- **Less-than-Significant Impact with Mitigation.** This determination applies if the project would result in a significant effect, exceeding the established significance criteria, but feasible mitigation is available that would reduce the impact to a less-than-significant level.
- **Significant and Unavoidable Impact with Mitigation.** This determination applies if the project would result in an adverse effect that exceeds the established significance criteria, and although feasible mitigation might lessen the impact, the residual effect would remain significant, and, therefore, the impact would be unavoidable.
- **Significant and Unavoidable Impact.** This determination applies if the project would result in an adverse effect that exceeds the established significance criteria, and there is no feasible mitigation available to reduce the impact to a less-than-significant level.

A.7 Mitigation Measures and Improvement Measures

Mitigation measures are identified, where feasible, for impacts considered significant or potentially significant consistent with CEQA Guidelines section 15126.4, which states that an EIR “shall describe feasible measures which could minimize significant adverse impacts.” CEQA requires that mitigation measures have an essential nexus and be roughly proportional to the significant effect identified in the EIR. The project sponsor has indicated that, if the project were approved, they would incorporate all mitigation measures identified in this EIR as part of the project.

Pursuant to CEQA Guidelines section 15126.4, mitigation measures are not required for environmental impacts that are not found to be significant. Therefore, for resource topics in which this EIR and IS found the proposed project’s physical environmental impact to be less than significant, the planning department could identify measures that would further lessen the already less-than-significant impacts of the project; these measures would be identified as “improvement measures.” At this time, the EIR and IS have not identified such improvement measures.

Impacts are numbered and shown in bold type, and the corresponding mitigation measures, where identified, are numbered and indented, and follow impact statements. Impacts and mitigation measures are numbered consecutively and include an abbreviated reference to the impact section (i.e., CR for Cultural Resources).

B. HISTORIC ARCHITECTURAL RESOURCES

B.1 Introduction

This subsection describes the historic architectural resources within the project site and evaluates potential direct and indirect impacts to those resources that could result from the proposed project. This section is based on the *Historic Resource Evaluations* (HREs) parts 1¹² and 2¹³ (and associated appendices) prepared for the proposed project and project variant, as well as the planning department-prepared *Preservation Team Review Form* (PTR) that includes a determination regarding the historic resource status of the building on the 550 O'Farrell Street project site.¹⁴ The HREs and PTR form are attached as Appendix C to this EIR.

Project impacts on a "historical resource," as defined by CEQA, are analyzed through a two-step process. The first step determines whether a project may impact a resource that falls within the definition of "historical resource" under CEQA. If the project may impact a historical resource, the second step determines whether the project would cause a "substantial adverse change in the significance of the historical resource." A project that may cause a substantial adverse change in the significance of a historical resource is one that may have a significant effect on the environment (CEQA Guidelines section 15064.5(b)(1)(2)).

B.2 Regulatory Framework

The following subsection describes pertinent laws and regulations regarding the identification and regulation of historic architectural resources.

Federal

National Historic Preservation Act

The National Historic Preservation Act (NHPA) of 1966 was passed primarily to acknowledge the importance of protecting our nation's heritage from rampant federal development. It was the

¹² Carey and Co. *Historic Resource Evaluation Part 1*, 550 O'Farrell Street, San Francisco, California, September 1, 2017.

¹³ TreanorHL, *Historic Resource Evaluation Part 2-Compatibility & Impacts Analysis*, 550 O'Farrell Street, San Francisco, California, July 29, 2019.

¹⁴ San Francisco Planning Department. *Preservation Team Review Form - 550 O'Farrell Street*. October 2, 2018.

triumph of more than a century of struggle by a grassroots movement of committed preservationists. The NHPA:

- Sets the federal policy for preserving our nation’s heritage,
- Establishes a federal-state and federal-tribal partnership,
- Establishes the National Register of Historic Places and National Historic Landmarks Programs,
- Mandates the selection of qualified State Historic Preservation Officers,
- Establishes the Advisory Council on Historic Preservation,
- Charges federal agencies with responsible stewardship, and
- Establishes the role of Certified Local Governments within the States.

While the NHPA sets federal policy for historic preservation, the actual regulations can be found in 36 Code of Federal Regulations (CFR) Part 800 “Protection of Historic Properties.” This provides guidelines on how to follow the policy set forth in the NHPA.

National Register of Historic Places

The National Register of Historic Places (NRHP, National Register) is the nation’s master inventory of cultural resources worthy of preservation. It is administered by the National Park Service, which is represented at the state level by the state historic preservation officer. The NRHP includes listings of buildings, structures, sites, objects, and districts that possess historic, architectural, engineering, archeological, or cultural significance at the federal, state, or local level. Resources that are listed in or have been found by the state historic preservation officer to be eligible for listing in the NRHP are called historic properties.

Under the NHPA, a property is considered significant if it meets the NHPA listing criteria in 36 CFR 60.4, as follows:

The quality of a significance in American history, architecture, archeology, and culture that is present in districts, sites, buildings, structures, and objects of state and local importance that possess integrity of location, design, setting, materials, workmanship, feeling, and association and that:

- a. Properties that are associated with events that have made a significant contribution to the broad patterns of U.S. history.
- b. Properties that are associated with persons of historic significance.

- c. Properties located in a geographic district that embody the characteristics of a type, period, or method of construction, or that represent works of “a master, “or that possess high artistic value, or that represents a significant and distinguishable entity whose components may lack individual distinction.
- d. Properties that have yielded or may yield, information important to history or prehistory.

Although there are exceptions, certain kinds of resources are not usually considered for listing in the NRHP: religious properties, moved properties, birthplaces and graves, cemeteries, reconstructed properties, commemorative properties, and properties that have achieved significance within the past 50 years.

A resource can be significant to American history, architecture, archeology, engineering, and/or culture at the national, state, or local level. In addition to meeting at least one of the four criteria, a property or district must retain integrity, meaning that it must have the ability to convey its significance through the retention of seven aspects, or qualities, that in various combinations define integrity:

- Location: Place where the historic property was constructed;
- Design: Combination of elements that create the form, plans, space, structure, and style of the property;
- Setting: The physical environment of the historic property, inclusive of the landscape and spatial relationships of the buildings;
- Materials: The physical elements that were combined or deposited during a particular period of time and in a particular pattern of configuration to form the historic property;
- Workmanship: Physical evidence of the crafts of a particular culture or people during any given period in history;
- Feeling: The property’s expression of the aesthetic or historic sense of a particular period of time; and
- Association: Direct link between an important historic event or person and an historic property.

U.S. Secretary of the Interior’s Standards for Treatment of Historic Properties

The Secretary of the Interior is responsible for establishing standards for all programs under departmental authority and for advising federal agencies on the preservation of historic properties listed in or eligible for listing in the NRHP. The Secretary of the Interior’s Standards (secretary’s standards) for Treatment of Historic Properties includes standards for preservation,

rehabilitation, restoration, and reconstruction.¹⁵ The secretary's standards for rehabilitation (rehabilitation standards) have been adopted by local government bodies across the country, including the City and County of San Francisco, for reviewing work to historic properties under local preservation ordinances. Developed by the National Park Service for reviewing certified rehabilitation tax credit projects, the rehabilitation standards provide guidance for reviewing work to historic properties.

The rehabilitation standards are as follows:

1. A property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces, and spatial relationships.
2. The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces, and spatial relationships that characterize a property will be avoided.
3. Each property will be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or elements from other historic properties, will not be undertaken.
4. Changes to a property that have acquired historic significance in their own right will be retained and preserved.
5. Distinctive materials, features, finishes, and construction techniques or examples of craftsmanship that characterize a property will be preserved.
6. Deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature will match the old in design, color, texture, and, where possible, materials. Replacement of missing features will be substantiated by documentary and physical evidence.
7. Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.
8. Archeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.
9. New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work will be differentiated from the old and will be compatible with the historic materials,

¹⁵ National Park Service. The Secretary of the Interior's Standards for Treatment of Historic Properties <https://www.nps.gov/tps/standards/rehabilitation/rehab/stand.htm>. Website accessed June 4, 2019.

features, size, scale, and proportion, and massing to protect the integrity of the property and its environment.

10. New additions and adjacent or related new construction will be undertaken in such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

The secretary's standards are a useful analytic tool for understanding and describing the potential impacts of changes to historic resources.

Conformance with all rehabilitation standards does not determine whether a project would cause a substantial adverse change in the significance of a historical resource under CEQA. Rather, projects that comply with the standards benefit from a regulatory presumption that they would have a less-than-significant adverse impact on a historic resource. Projects that do not comply with the rehabilitation standards may or may not cause a substantial adverse change in the significance of a historic resource and would require further analysis to determine whether the historic resource would be "materially impaired" by the project under CEQA Guidelines section 15064.5(b).

State

California Register of Historical Resources

The California Register of Historical Resources (CRHR, California Register) "an authoritative listing and guide to be used by state and local agencies, private groups, and citizens in identifying the existing historical resources of the state and to indicate which resources deserve to be protected, to the extent prudent and feasible, from substantial adverse change" (Public Resources Code Section 5024.1(a)). The criteria for eligibility for the California Register are based on National Register criteria (Public Resources Code Section 5024.1(b)). Certain resources are determined by the statute to be automatically included in the California Register, including those formally determined eligible for or listed in the National Register. To be eligible for the CRHR as a historical resource, a prehistoric or historic-period resource must be significant at the local or state level under one or more of the following criteria (Public Resources Code Section 5024.1(c)):

- Criterion 1 (Events): Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
- Criterion 2 (Persons): Is associated with the lives of persons important in our past;
- Criterion 3 (Architecture): Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or

- Criterion 4 (Information Potential): Has yielded, or may be likely to yield, information important in prehistory or history (CEQA Guidelines Section 15064.5(a)(3)).

Integrity

For a resource to be eligible for the CRHR, it must also retain enough integrity to be recognizable as a historical resource and convey its significance. A resource that does not meet the NRHP criteria may still be eligible for listing in the CRHR. While a property's significance relates to its role within a specific historic context, its integrity refers to "a property's physical features and how they relate to its significance."¹⁶ To determine if a property retains the physical characteristics corresponding to its historic context, the NRHP has identified seven aspects of integrity, which the CRHR closely follows:¹⁷

- Location is the place where the historic property was constructed or the place where the historic event occurred.
- Design is the combination of elements that create the form, plan, space, structure, and style of a property.
- Setting is the physical environment of a historic property.
- Materials are the physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property.
- Workmanship is the physical evidence of the crafts of a particular culture or people during any given period in history or prehistory.
- Feeling is a property's expression of the aesthetic or historic sense of a particular period of time.
- Association is the direct link between an important historic event or person and a historic property.

California Office of Historic Preservation

The State of California implements the NHPA through its statewide comprehensive cultural resource surveys and preservation programs. The California Office of Historic Preservation is an office of the California Department of Parks and Recreation and implements the policies of the NHPA on a statewide level. The Office of Historic Preservation also maintains the California Historical Resources Inventory. The State Historic Preservation Officer is an appointed official

¹⁶ U.S. Department of the Interior, National Park Service. 1997. How to Apply the National Register Criteria for Evaluation. National Register Bulletin No. 15 (Washington, D.C.): 44.

¹⁷ *Ibid.*

who implements historic preservation programs in the state's jurisdiction and is housed at the California Office of Historic Preservation.

California Environmental Quality Act

CEQA defines a "historical resource" as a resource that is listed in, or determined eligible for listing in, the CRHR. A resource is presumed to be a historical resource, absent evidence to the contrary, if it is identified as significant in a local register of historical resources or identified in a historical resources survey which meets state requirements. Finally, a lead agency may determine that a resource is a historical resource based on other information. CEQA applies to all discretionary projects undertaken or subject to approval by the state's public agencies.¹⁸ CEQA states that it is the policy of the State of California to "take all action necessary to provide the people of this state with...historic environmental qualities...and preserve for future generations examples of the major periods of California history."¹⁹ Under the provisions of CEQA, "A project with an effect that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment."²⁰ CEQA thus requires that historical resources be taken into consideration during the planning process.²¹ If feasible, adverse effects to the significance of historical resources must be avoided, or the effects mitigated.²²

CEQA guidelines section 15064.5(a) defines a "historical resource" if it is:

- Listed in, or determined eligible for listing in, the CRHR by the State Historical Resources Commission; or
- Listed in a local register of historical resources, as defined in PRC section 5020.1(k) or identified as significant in a historical resource survey meeting the requirements of PRC section 5024.1(g); or
- Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California; or

¹⁸ California Code of Regulations (CCR) 14(3) section 15002(i).

¹⁹ Public Resources Code (PRC) section 21001(b), (c).

²⁰ CCR 14(3) section 15064.5(b).

²¹ CCR 14(3) section 15064.5; PRC section 21083.2.

²² CCR 14(3) section 15064.5(b)(4).

- Determined to be a historical resource by a project's lead agency.²³

Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing in the California Register of Historical Resources.²⁴

San Francisco

San Francisco General Plan

The draft Preservation Element of the San Francisco General Plan, which contains objectives and policies that promote the protection and preservation of historic architectural resources, was published in 2007, but has not been formally adopted. However, the City of San Francisco's commitment to historic preservation is codified generally in section 101.1 of the planning code, which sets forth eight Priority Policies, including Policy 7, which requires that landmarks and historic buildings be preserved, and further states: "The purpose of the Preservation Element of Accountable Planning Initiative²⁵ of the San Francisco General Plan is to provide background information related to historic preservation and to outline a comprehensive set of objectives and policies for the preservation and enhancement of San Francisco's historic resources. Historic resources include buildings, sites, structures, cultural landscapes, districts, and objects that are historically and/or archaeologically significant."

The San Francisco General Plan Urban Design Element addresses historic preservation and includes the following policies:

Policy 2.4: Preserve notable landmarks and areas of historic, architectural, or aesthetic value, and promote the preservation of other buildings and features that provide continuity with past development.

- Objective 2: Conservation of resources that provide a sense of nature, continuity with the past, and freedom from overcrowding.

Policy 2.4: Preserve notable landmarks and areas of historic, architectural, or aesthetic value, and promote the preservation of other buildings and features that provide continuity with past development.

²³ CCR 14(3) section 15064.5(a).

²⁴ CCR 14(3) section 15064.5(a)(3).

²⁵ The Accountable Planning Initiative (Proposition M of 1986) added eight priority policies to the Planning Code and to the preamble to the General Plan that "shall be the basis upon which inconsistencies in the General Plan are resolved" (Planning Code section 101.1). Priority policy 7 is "that landmarks and historic buildings be preserved."

Policy 2.5: Use care in remodeling of older buildings, in order to enhance rather than weaken the original character of such buildings.

Policy 2.6: Respect the character of older development nearby in the design of new buildings.

San Francisco Planning Code

Article 10

Adopted in 1967, planning code article 10 provides for the identification, designation, and protection of historical resources and establishes an adopted local register of historic resources that includes designated City landmarks and historic districts. San Francisco landmarks are buildings, properties, structures, sites, districts, and objects of “special character or special historical, architectural or aesthetic interest or value and are an important part of the city’s historical and architectural heritage.” Historic districts are defined generally as areas of multiple historic resources that are contextually united. Designated landmarks and historic districts are important to the city’s history and help to provide significant and unique examples of the past that are irreplaceable. The City landmarks and historic district designation process uses the NRHP criteria as the basis of evaluation for historic buildings.

Article 11

Adopted in 1985, planning code article 11 provides for the conservation of buildings in the downtown that “possess concentrations of buildings that together create a unique historic, architectural, and aesthetic character which contributes to the beauty and attractiveness of the City.” Article 11 of the planning code designated individual buildings and six historic conservation districts.

Articles 10 and 11 of the planning code protect City landmarks and historic districts from inappropriate alterations and demolitions through review by the San Francisco Historic Preservation Commission (HPC), a seven-member body that makes recommendations to the San Francisco Board of Supervisors on landmark designations, historic district designations, and individual resource designations in historic districts. The HPC reviews and provides comments on environmental documents under CEQA for projects affecting historical resources, and the HPC reviews and comments on any agreements proposed under the NHPA where the City of San Francisco would be a signatory party. The HPC also approves Certificates of Appropriateness for landmarks and properties in article 10 historic districts. The City and County of San Francisco reviews the historical resources designated under articles 10 and 11 of the planning code when it evaluates project impacts on historical resources.

B.3 Environmental Setting

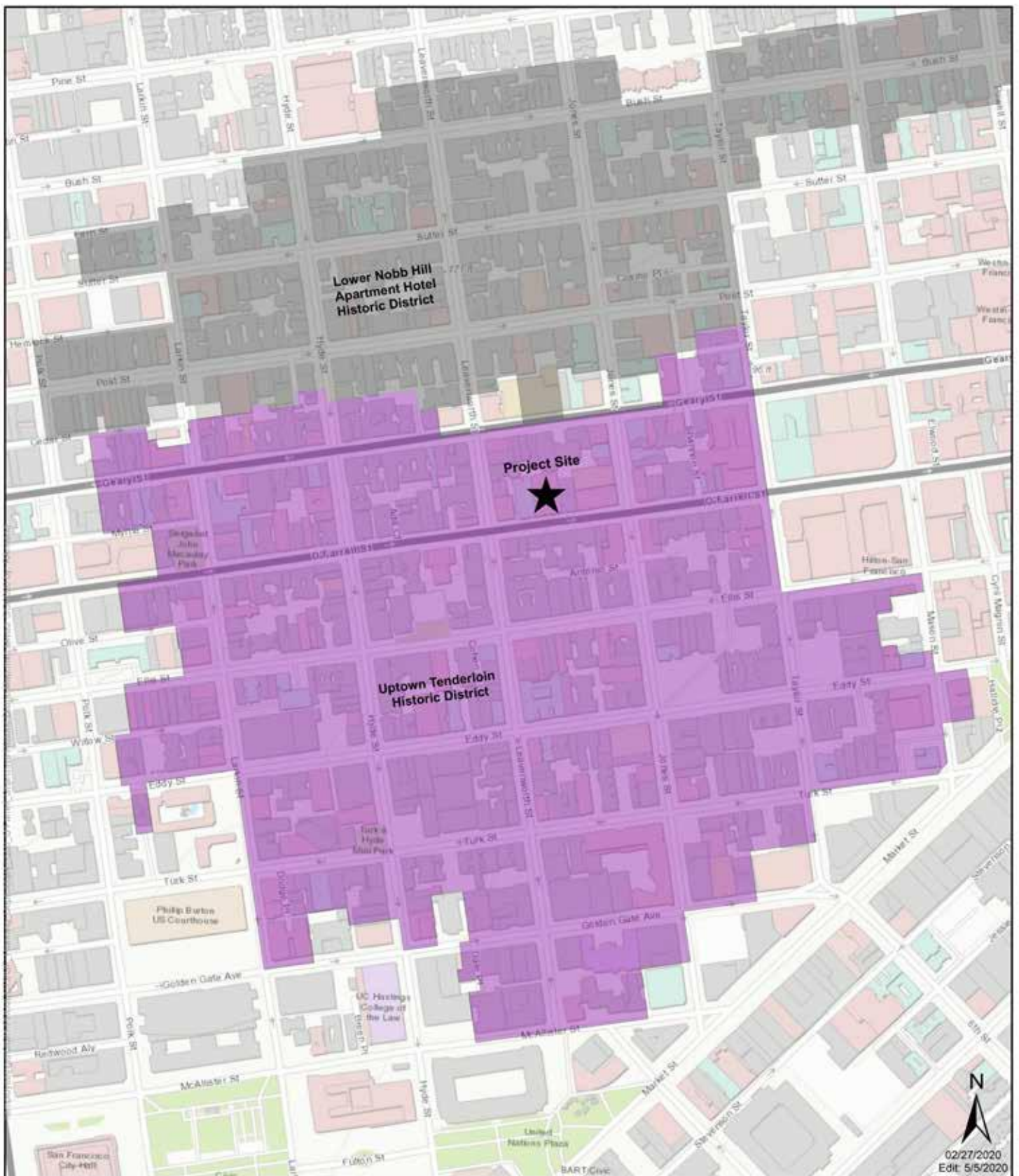
Historical Context

The project site is within a 16-block area identified as the Uptown Tenderloin Historic District (UTHD), listed in the National Register. The district is bounded roughly by Mason and Taylor streets to the east, Geary Street to the north, Larkin Street to the west, and Golden Gate Avenue and McAllister Street to the south (see **Figure 3-1: Uptown Tenderloin Historic District Map**, p. 3-15).

The district is formed around its predominant building types: three- to seven-story, multi-unit apartments, hotels, or apartment/hotels constructed of brick or reinforced concrete. Architectural ornamentation of buildings within the district was applied as a revival of a historical style (such as Spanish Colonial Revival) or influenced by a mix of influences ranging from the Renaissance to Baroque architecture. On the exteriors, sometimes only signage clearly distinguishes between these related building types. Because virtually the entire district was constructed in the quarter-century between 1906 and the early 1930s, a limited number of architects, builders, and clients produced a harmonious group of structures that share a single, classically oriented visual image using similar materials and details.

The buildings in the Uptown Tenderloin Historic District include many similar characteristics. Following the 1906 earthquake and fire, the buildings were required to be of fire-resistant construction and include fire escapes. They contain bay windows on street facades with double-hung windows in early buildings and casement windows in later buildings. Roofs are flat and surrounded by parapets with decorative cornices. Common façade cladding includes terra-cotta, molded galvanized steel, or cast concrete. The buildings are composed in a two-part or three-part vertical composition depending on type and rise up from the sidewalk creating a continuous wall.

Among the predominantly residential buildings are examples of other building types that support residential life, including churches, stores, garages, a YMCA complex, and a bathhouse. In addition, there are a few building types that are not directly related to the residential neighborhood: machine shops, office buildings, union halls, and film exchanges. Although not necessarily related to residential life, the union halls (for example, those serving waitresses and musicians) and the film exchanges are related to the overlay of entertainment businesses in and around the neighborhood.



SOURCE: City and County of San Francisco Planning Department

550 O'FARRELL STREET PROJECT

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FIGURE 3-1: Uptown Tenderloin Historic District Map

Garages

Parking garages in the Uptown Tenderloin Historic District were reinforced concrete structures with two to five stories, often with a basement. The early 20th century garages are “infill buildings presenting a composed and ornamented façade to the street, and they are related to other commercial, utilitarian, popular, and service-oriented buildings conforming to this template.”²⁶ A typical garage comprised an architectural front and a transportation shed behind. The façades of these garages employed a traditional architectural vocabulary—similar to the exteriors of civic and institutional buildings of the period but simpler. The utilitarian shed mostly featured exposed structure and unfinished surfaces.

The majority of the parking garages within the district were built after World War I. Located in and scattered throughout the southern part of the district, they were built to serve residents of the apartments and hotels and also customers of the area's businesses. The garages in the district are mostly two- to five-story reinforced concrete structures with Renaissance/Baroque, Mission Revival, Moderne, and Gothic Revival ornamentation. Examples of the Gothic Revival style include the subject building at 550 O’Farrell Street, as well as 265 Eddy Street and 640 O’Farrell Street.²⁷ Among 21 contributing garage buildings within the district, three have been converted to different uses (two to commercial uses and one to a police station).

550 O’Farrell Street

550 O’Farrell Street is a two-story garage with a Gothic Revival façade on O’Farrell Street. The garage also includes a flat roof and plaster finish that has been scored with an ashlar masonry pattern (see **Figure 3-2: 550 O’Farrell Street Building Character-Defining Features**, p. 3-18). The primary façade is divided into five bays separated by buttress piers. On the first floor, the westernmost bay includes an aluminum-sash storefront with a recessed entrance. Two roll-up garage doors occupy the second and fourth bays while the remaining bays contain aluminum-sash fixed windows.

The façade includes decorative panels between the first and second floors. The second floor features shallow arched openings with aluminum-sash slider windows. The rear and side windows are multi-lite steel sash. Notable features include a small balcony with ogee arches and decorative brackets at the center bay, a row of attached gargoyles above the second floor, and a parapet with blind quatrefoil panels. The remaining three bays feature arched windows embedded in concrete. The interior of the garage is rudimentary with exposed concrete walls, concrete floors, and wood trusses.

²⁶ Corbett and Bloomfield, Uptown Tenderloin Historic District, Section 7, p. 10; Section 8, p. 28

²⁷ *Ibid*, p. 3-5, footnote 12.

The architect was William C. Crim, Jr. The garage was built in 1924 for the Abbey Land Improvement Company and from 1925 to 1978 was occupied by the Abbey Garage and Towing service. Major exterior alterations include window replacement and the construction of a new storefront (1985), parapet bracing (1987), and removal of the original skylights (1991).

Evaluation of Historical Significance

Individual Significance

Based on the findings of the HRE Part 1 as summarized in the PTR, the planning department confirmed the eligibility of 550 O'Farrell Street for individual listing in the California Register of Historical Resources under Criterion 3 as a good example of the Gothic Revival architectural style designed by William C. Crim, Jr., who is generally regarded as a master in the field of architecture. The building at 550 O'Farrell Street retains integrity of location and setting as the structure has never been moved and is largely surrounded by buildings that were present at the time of its construction. It remains in use as a garage and thus retains integrity of association. The building has undergone few alterations including window replacements and a new storefront; however, the changes do not affect the major character-defining features. The building retains integrity of design, workmanship, materials, and feeling. Overall, the building retains sufficient physical integrity to convey its significance as an individual resource.

550 O'Farrell Street is not listed as an article 10 City Landmark, nor is it within an article 11 conservation district.

Character-Defining Features

Character-defining features include architectural ornament, engineering systems, construction details, massing, materials, craftsmanship, site features, and landscaping built within the period of significance. The period of significance for 550 O'Farrell has been established as 1924, when it was constructed. The character-defining features of 550 O'Farrell include the following:

- Low-scale two-story massing
- Primary façade organization of five-bays separated by piers
- Reinforced concrete construction with arched wood truss roof system
- Plaster finish scored to look like ashlar masonry at the primary facade
- Large openings on the first floor
- Arched windows on the second floor
- Decorative panels
- Balcony with ogee arches and decorative brackets at the center bay
- Row of attached gargoyles
- Parapet with blind quatrefoil panels



CHARACTER-DEFINING FEATURES OF 550 O'FARRELL STREET

1. Low-scale two-story massing
2. Primary Facade organization of five bays separated by piers
3. Reinforced concrete construction with arched wood truss roof system
4. Plaster finish scored to look like Ashlar Masonry at the primary facade
5. Large openings on the first floor

6. Arched windows on second floor
7. Decorative Panels
8. Balcony with ogee arches with decorative brackets at the center bay
9. Row of attached gargoyles
10. Parapet with blind quatrefoil panels

SOURCE: BRICK INC.

550 O'FARRELL STREET PROJECT

Case No. 2017-004557/ENV

FIGURE 3-2: 550 O'Farrell Street Building Character-Defining Features

Uptown Tenderloin Historic District

The project site is also located within the Uptown Tenderloin Historic District (UTHD) which is listed on the National Register. As noted above, districts listed on the National Register are also listed on the California Register. The district is considered significant under two National/California Register criteria:

- Criterion A/1 (Events) in the area of social history for its association with the development of hotel and apartment life in San Francisco during a critical period of change, and for being a distinctive residential area that is associated with commercial activity, entertainment, and vice; and
- Criterion C/3 (Design/Construction) in the area of architecture for its distinctive mix of building types that served a new urban population of office and retail workers.

The period of significance for the district is 1906-1957. At the time of listing the UTHD comprised 477 buildings and sites, 409 of which were identified as contributing resources and 68 that were identified as noncontributing resources. The UTHD is comprised predominantly of the apartment hotel building type that ranges from three to seven-story multi-unit apartment buildings constructed of brick or reinforced concrete detailed in classically oriented imagery. Mixed in with the apartment buildings are other buildings that support the residential life of the neighborhood and include churches, stores, and garages. Since the district was listed in the National Register in 2009 there have been only 3 contributing resources demolished (101 Golden Gate Ave, 651 Geary Blvd, and 719 Larkin St). The contributing resources included a garage that had been converted into an office building, a one-story commercial store, and a film exchange office. One non-contributing resource has been demolished and replaced. This leaves the total number of district contributors at 406. Although a few district contributors have been demolished, the district still maintains a high ratio of contributors to non-contributors and the district retains its range of significant building types and styles. Therefore, the Uptown Tenderloin Historic District continues to convey its historic significance under criteria A and C through the remaining over 400 contributing resources.

As noted above, parking garages in the district are two-to-five story reinforced concrete structures primarily built after World War I. These buildings functioned as support structures for the primary residential and business uses of the district during its period of significance. Among the 21 contributing garage buildings within the district, three have been converted to different uses (two to commercial uses and one to a police station).

As a garage constructed in 1924, 550 O'Farrell Street is also a contributor to the Uptown Tenderloin Historic District. 550 O'Farrell Street retains sufficient integrity to convey its significance as a contributor to the district.

B.4 Impacts and Mitigation Measures

This section describes the impact analysis related to historic architectural resources for the proposed project and project variant. It describes the significance criteria and the methods used to determine the impacts of the proposed project and project variant and evaluates the impacts on historic architectural resources to conclude whether an impact would be significant. Measures to mitigate (i.e., avoid, minimize, rectify, reduce, eliminate, or compensate for) significant impacts accompany the discussion of each identified significant impact.

Significance Criteria

The criteria for determining the significance of impacts in this analysis were determined and are consistent with the environmental checklist in Appendix G of the CEQA guidelines, which has been adopted and modified by the planning department. For the purpose of this analysis, the following applicable thresholds were used to determine whether implementation of the proposed project would result in a significant historic architectural resources impact. Implementation of the proposed project or the project variant would have a significant effect on historic architectural resources if the project would:

Cause a substantial adverse change in the significance of a historical resource as defined in CEQA guidelines section 15064.5, including those resources listed in article 10 or article 11 of the planning code, or conflict with an applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to, the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect related to historic resources.

The Regulatory Framework - California Environmental Quality Act discussion above presents the section 15064.5 definition of an historical resource in detail.

Approach to Analysis

Once a resource has been identified as significant, it must be determined whether the project would cause a “substantial adverse change” that materially impairs the significance of the resource. For historic buildings and structures, CEQA guidelines section 15064.5(b)(3) provides that a project that follows the secretary’s standards generally shall be considered to have mitigated impacts on a historical resource to a level below significance. A project that complies with the secretary’s standards benefits from a regulatory presumption that it would have a less-than-significant adverse impact on the environment. Projects that do not comply with the secretary’s standards may or may not cause a substantial adverse change in the significance of a historic resource and would require further analysis by the planning department to determine whether the historic resource would be “materially impaired” by the project under CEQA guidelines section 15064.5(b).

Material impairment occurs when there is demolition or alteration of the resource's physical characteristics that convey its historical significance and that justify its inclusion in the CRHR or other applicable listing. Mitigation for effects on historical architectural resources may involve avoidance of the resource, revision of a proposed project to minimize the effect, or, where avoidance or minimization is not feasible, documentation of the resource, which would not reduce effects on a historical architectural resource to a less-than-significant level.

Approach to Cumulative Analysis

The cumulative analysis for the proposed project or project variant focuses on potential impacts to identified historic districts, as the project is within, and is a contributor to the Uptown Tenderloin Historic District. With respect to vibration impacts on historic resources, the cumulative approach includes cumulative development projects in the vicinity that would have the potential to generate vibration that could potentially cause structural damage to the adjacent historic resource. **Table 3-1: Proposed, Ongoing, and Completed Projects in the Uptown Tenderloin Historic District**, p. 3-22, provides the addresses of cumulative projects, identifies whether the buildings are contributors to the district, and provides the status of each project and furthermore, identifies which projects include demolitions of existing structures. Of the 18 projects listed in the table, ten are sites with contributory structures, and eight are non-contributory.

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Table 3-1: Proposed, Ongoing, and Completed Projects in the Uptown Tenderloin Historic District

| Address | Property Type (Existing) | Property Status | Project Description | Building Permit Status |
|--------------------------|---|----------------------------|--|--|
| 246 Eddy St. | Club house | NC | Clubhouse demolished; new construction of replacement club house. | Complete |
| 430 Eddy St. | Parking | NC | New construction of an eight-story mixed-use building on a vacant lot. | Approved |
| 469 Eddy St. | Garage | C | Preserve the existing façade. New construction of a six-story mixed-use building and retention of existing façade. | Issued |
| 538 Eddy St. | Parking lot of PG&E building | NC | New construction of a two-story, electrical switchgear building for PG&E. | Complete |
| 229/231 Ellis St. | Mixed-use (Bath) | C | Exterior modifications, rehabilitation, and one-story vertical addition to four-story over basement mixed use building. | Issued |
| 479 Ellis St. | Stores | C | Façade modifications and alterations to an existing building. | Issued |
| 519 Ellis St. | Parking lot | NC | New construction of an eight-story mixed-use building on vacant lot. | Filed (Approved by Planning Department) |
| 651-661 Geary St. | Garage, converted to offices | C | Converted garage demolished; new construction of a 13-story mixed-use building. | Demolition complete; new construction not commenced |
| 101/121 Golden Gate Ave. | Film exchange & offices, later social services center | C | Film exchange building demolished, new construction of a 10-story mixed use building. | Complete |
| 135 Hyde St. | Garage | C | Demolition of a garage building; new construction of eight-story mixed-use building. | Approved |
| 245 Hyde St. | Film exchange | C | Develop the site for an eight-story, mixed-use project with ground floor commercial and seven floors of residential units. | No permit application filed |
| 719 Larkin St. | Stores | C | Commercial building demolished; new construction of eight-story mixed-use building. | Complete |

Table 3-1: Proposed, Ongoing, and Completed Projects in the Uptown Tenderloin Historic District

| Address | Property Type (Existing) | Property Status | Project Description | Building Permit Status |
|---|------------------------------------|-----------------|---|------------------------|
| 145 Leavenworth | Parking lot | NC | New construction of a nine-story mixed-use building on parking lot. | Issued |
| 19-25 Mason | Parking lot | NC | New construction of a 12-story mixed-use building on parking lots. | Issued |
| 450 O'Farrell St. 474 O'Farrell St. 532 Jones St. | Church Commercial Commercial | C | Demolish 450 O'Farrell (church), 474 O'Farrell (commercial building), and 532 Jones streets (commercial building); new construction of a 13-story mixed-use building. | Filed |
| 210/238 Taylor St. | Parking lot | NC | New construction of eight-story mixed-use building on parking lot. | Issued |
| 361 Turk | Parking lot | NC | New construction of nine-story mixed-use building on parking lot. | Issued |
| 180 Jones | Parking lot | NC | New construction of nine-story mixed use building on parking lot. | Filed |

Notes:

Table adapted from TreanorHL, *Historic Resource Evaluation Part 2-Compatibility & Impacts Analysis, 550 O'Farrell Street*

Demolition of district contributors and new development are shown in bold

C: Contributor to the Uptown Tenderloin Historic District (UTHD)

NC: Non-contributor to the UTHD

Under Review: Initial review

HRER: Historic resource evaluation response

SOIS: Secretary of the Interior's Standards

Impact CR-1: Demolition of the 550 O'Farrell Street Structure with Retained Façade

Impact CR-1: The proposed project would demolish most of the 550 O'Farrell Street building, causing a substantial adverse change in the significance of a historical resource as defined in CEQA guidelines section 15064.5. (Significant and Unavoidable with Mitigation)

The 550 O'Farrell Street garage has been determined to be individually eligible for listing on the CRHR.²⁸ The proposed project would demolish most of the 550 O'Farrell Street building. The proposed project, a 13-story, 111-unit residential mixed-use building, would retain the garage's primary façade that contains much of the character-defining features and recognized historic elements of Gothic Revival architecture. The proposed project would incorporate retained elements of the existing façade into the lower floors of the O'Farrell Street frontage. However, demolition of the remainder of the building would result in a loss of character-defining low-scale, two-story massing, reinforced concrete construction, and the building's arched wood-truss roof, contributing to a substantial loss of historic building materials and form. Therefore, demolition of most of the existing 550 O'Farrell Street building would have a significant adverse effect on a historic resource.

Mitigation Measures

Implementation of the following mitigation measures would apply to the proposed project. The mitigation measures would lessen the impact of the proposed demolition of most of 550 O'Farrell Street with the proposed project. However, the mitigation measures would not reduce those impacts to a less-than-significant level and impacts would remain significant and unavoidable.

Mitigation Measure M-CR-1a: Documentation

Prior to the issuance of demolition or site permits, the project sponsor shall undertake HABS-like documentation of the building, structures, objects, materials, and landscaping. The documentation shall be undertaken by a qualified professional who meets the standards for history, architectural history, or architecture (as appropriate), as set forth by the Secretary of the Interior's Professional Qualification Standards (36 CFR, Part 61). The specific scope of the documentation shall be reviewed and approved by the planning department prior to fulfilling documentation but shall consist of the following:

- Measured Drawings: A set of measured drawings that depict the existing size, scale, and dimension of the building. The planning department preservation staff will accept the original architectural drawings or an as-built set of architectural drawings (plan, section, elevation, etc.). The planning department preservation

²⁸ Carey & Co. Inc., *Historic Resource Evaluation—Part 1. 550 O'Farrell Street*, San Francisco California, September 1, 2017, and Treanor HL *Historic Resource Evaluation—Part 2*, March 11, 2019.

staff will assist the consultant in determining the appropriate level of measured drawings.

- HABS-Level Photography: Digital photographs of the interior and the exterior of building. Large format negatives are not required. The scope of the digital photographs shall be reviewed by planning department preservation staff for concurrence, and all digital photography shall be conducted according to the latest National Park Service standards. The photography shall be undertaken by a qualified professional with demonstrated experience in HABS photography.

Photograph views shall include contextual views; views of each side of the building and interior views, including any original interior features, where possible; oblique views of the building; and detail views of character-defining features.

All views shall be referenced on a photographic key. This photographic key shall be on a map of the property and shall show the photograph number with an arrow to indicate the direction of the view. Historic photographs shall also be collected, reproduced, and included.

- HABS-level Historical Report – A written historical narrative and report shall be provided in accordance with the HABS/HALS Historical Report Guidelines. The written history shall follow an outline format that begins with a statement of significance supported by the development of the architectural and historical context in which the structure was built and subsequently evolved. The report shall also include architectural description and bibliographic information.
- Softcover Book – A Print-on-Demand softcover book shall be produced that includes the content from the historical report, historical photographs, HABS/HALS photography, measured drawings, and field notes. The Print-on-Demand book shall be made available to the public for distribution.

The professional shall prepare the documentation and submit it for review and approval by the planning department's preservation specialist prior to the issuance of demolition permits. The documentation shall be disseminated to the planning department, San Francisco Main Library History Room, Northwest Information Center-California Historical Resource Information System, and San Francisco Architectural Heritage.

- Video recordation shall be undertaken prior to the issuance of demolition or site permits. The project sponsor shall undertake video documentation of the affected historical resource and its setting. The documentation shall be conducted by a professional videographer, preferably one with experience recording architectural resources. The documentation shall be narrated by a qualified professional who meets the standards for history, architectural history, or architecture (as

appropriate) set forth by the Secretary of the Interior’s Professional Qualification Standards (36 CFR, Part 61). The documentation shall include as much information as possible—using visuals in combination with narration—about the materials, construction methods, current condition, historic use, and historic context of the historical resource. Archival copies of the video documentation shall be submitted to the planning department and to repositories including but not limited to the San Francisco Main Library History Room, Northwest Information Center-California Historical Resource Information System, and San Francisco Architectural Heritage.

The video documentation shall be reviewed and approved by the planning department’s preservation staff prior to issuance of a demolition permit or site permit.

Mitigation Measure M-CR-1b: Interpretation

The project sponsor shall provide a permanent display of interpretive materials concerning the history and architectural features of the original 550 O’Farrell Street building, its operation during the period of significance, and its relationship to the Uptown Tenderloin Historic District and surrounding neighborhood. Interpretation of the site’s history shall be supervised by an architectural historian or historian who meets the Secretary of the Interior’s Professional Qualification Standards. The interpretative materials (which may include but are not limited to a display of photographs, news articles, memorabilia, and/or video) shall be placed in a prominent setting on the project site visible to pedestrians.

A proposal describing the general parameters of the interpretive program shall be approved by the planning department preservation staff prior to issuance of a site permit. The content, media, and other characteristics of such interpretive display shall be approved by the planning department preservation staff prior to issuance of a Temporary Certificate of Occupancy.

Impact CR-2: Demolition of the 550 O’Farrell Street Structure

Impact CR-2: The project variant would demolish the 550 O’Farrell Street building, causing a substantial adverse change in the significance of a historical resource as defined in CEQA guidelines section 15064.5. (Significant and Unavoidable with Mitigation)

As stated above, the 550 O'Farrell Street garage has been determined to be individually eligible for listing on the CRHR.²⁹ The project variant would completely demolish and replace the existing garage with a 13-story, 116-unit, mostly residential building. The project variant would not include retained elements of the existing historic structure. Demolition of the building would result in a loss of character-defining Gothic Revival façade, low-scale, two-story massing, reinforced concrete construction, and arched wood-truss roof. Therefore, demolition of the existing 550 O'Farrell Street building would have a significant adverse effect on a historic resource.

Mitigation Measures

Implementation of mitigation measures M-CR-1a and 1b (described above) would also apply to the project variant. The mitigation measures would lessen the impact of the complete demolition of 550 O'Farrell Street with the project variant. Implementation of the following **Mitigation Measure M-CR-2: Salvage** would only apply to full demolition of the garage with the project variant.

Mitigation measures M-CR-1a, 1b, and 2 would not lessen the severity from the loss of an individual resource and this impact of the project variant would remain significant and unavoidable.

Mitigation Measure M-CR-2: Salvage

Prior to any demolition that would remove character-defining features as part of construction of the project variant, the project sponsor shall consult with planning department preservation staff as to whether any such features may be salvaged, in whole or in part, during demolition/alteration. The project sponsor shall make a good faith effort to salvage materials of historical interest to be utilized as part of the interpretative program. This could include salvage of the gargoyles on the primary façade. Salvaging activities would not lessen the severity from the loss of an individual district contributor, and this impact would remain significant and unavoidable.

Impact CR-3: Development at 550 O'Farrell Street under the proposed project or project variant would not cause a substantial adverse change in the significance of the Uptown Tenderloin Historic District. (Less than Significant)

As discussed in the Environmental Setting section above, 550 O'Farrell Street is also a contributor to the National Register-listed Uptown Tenderloin Historic District. The district is listed in the National Register under Criterion A for its association with the development of hotel and

²⁹ Carey & Co. Inc., *Historic Resource Evaluation—Part 1. 550 O'Farrell Street*, San Francisco California, September 1, 2017, and Treanor HL *Historic Resource Evaluation—Part 2*, March 11, 2019.

apartment life in San Francisco during a critical period of change, and as a distinctive residential area associated with commercial activity, entertainment and vice. The historic district is listed under Criterion C for its distinctive mix of building types that served a new urban population of office and retail workers.

Demolition

Proposed Project

The proposed project would demolish most of the 550 O'Farrell Street structure, a two-story parking garage that is a contributor to the National Register-listed Uptown Tenderloin Historic District. The proposed project would include retained elements of the existing façade, with its character-defining features incorporated into the lower floors of the O'Farrell Street frontage. Those elements would relate to the character of other contributing buildings in the district. The proposed project would, however, destroy other historic materials, features, and spatial relationships that characterize the property as a contributor to the district. As concluded above under Impact CR-1, the proposed project would have a significant adverse impact on an individual historical resource.

Nevertheless, the loss of a single contributor to the district would occur within the larger context. The district originally had a total of 409 extant contributing buildings and sites and 68 non-contributing buildings and sites. To date there have only been 3 contributing buildings demolished within the district (See Table 3-1). With the large ratio of contributing to non-contributing buildings, the loss of one contributing building, bringing the total loss of contributing buildings to 4, would not substantially reduce the ratio of contributory to non-contributory buildings. Additionally, the 550 O'Farrell Street structure is identified as a support structure for the significant residential use of the district and is one of 21 garage structures within the district. Therefore, the loss of this one garage building would not prevent the district from conveying its historical significance. The proposed project would not result in a substantial adverse change to the Uptown Tenderloin Historic District and impacts would be less than significant.

Project Variant

The project variant would demolish a single two-story parking garage located in an National Register-listed historic district and would destroy historic materials, features, and spatial relationships that characterize the property as a contributor to the district. As concluded above under Impact CR-2, the project variant would have a significant adverse impact on a historic resource. As stated above for the proposed project, the loss of a single contributor to the district would occur within the larger context of the district and would not prevent the district from conveying its historical significance. The project variant would not result in a substantial adverse change to the district and impacts would be less than significant.

New Construction

Proposed Project

The proposed project would construct a 13-story, 130-foot-tall (with an additional 16 feet for the mechanical penthouse) mixed-use building with up to 111 dwelling units and retail/residential amenity space on the ground floor. The proposed building would be roughly rectangular in plan. The proposed project would include retained elements of the existing façade and its character-defining features incorporated into the lower floors of the O'Farrell Street frontage. The building massing would maintain the continuous street wall along O'Farrell Street

The historic district compatibility analysis in HRE Part 2,³⁰ and subsequent review by the planning department found that, in general, the proposed 550 O'Farrell Street project would be compatible with the character-defining features of the Uptown Tenderloin Historic District in terms of size and scale, massing and composition, and materials. The proposed project would be 13-stories tall on O'Farrell Street. At 13 stories, the building would not be the tallest on the block or even on the adjacent blocks. While the character-defining features of the district describe buildings that are anywhere between three and seven stories, many of the contributing buildings in the immediate neighborhood are in fact much taller than seven stories. Most contributing buildings in the district occupy the entire width of the lot and create a continuous street wall. The proposed project would continue the rhythm of street walls on the block by retaining the existing façade.

The composition of the proposed project would follow the typical tripartite composition of contributing buildings within the district. The base of the building in the proposed project would be the façade of the existing garage with new storefront windows and entrances on the ground floor to accommodate the new uses of the building. The middle portion of the new building would incorporate a regular rhythm of punched vertical openings from floors 5 through 12. Windows would feature a deep recess from the building wall and while there would be some minor differences in window configuration and operation, the overall rhythm would be that of a unified composition across the façade. The building would terminate at the 13th floor with a floor slightly recessed and finished in a different material from the floor below. Capping the 13th floor would be a decorative metal cornice that projects slightly from the floor below.

The general composition of the building, with its three-part façade that would retain the existing façade of the garage, regularly punched openings, and use of a simple metal cornice as an architectural cap to the building, would be compatible with the overall character of the historic district. A vertical hyphen would be incorporated at the fourth floor of the proposed project so as

³⁰ TreanorHL, *Historic Resource Evaluation Part 2-Compatibility & Impacts Analysis, 550 O'Farrell Street, San Francisco, California*, December 18, 2018.

to provide a visual and physical separation between the façade of the garage and the upper floors. The hyphen would be recessed behind the existing building by approximately three feet and the material of the floors at this level would be differentiated so as to emphasize an aesthetic separation.

The materials of the proposed project have been determined to be compatible with the character of the historic district. The center element of the tripartite composition would be finished in an architectural precast concrete organized in a thin horizontal composition while the fenestration would be vertically oriented fixed and awning windows set within a metal panel.

In conclusion, although the proposed project would demolish most of an existing structure, the proposed project would not adversely affect the eligibility of the historic district as a whole because the design has been determined to be compatible with the character of the historic district, including retaining Gothic Revival elements of the existing façade. Therefore, this impact would be less than significant.

Project Variant

The project variant would construct a 13-story, 130-foot-tall (with an additional 16 feet for the elevator penthouse) mixed-use building with up to 116 dwelling units and retail/residential amenity space on the ground floor. The proposed building would be roughly rectangular in plan. The building massing would maintain the continuous street wall along O'Farrell Street.

In general, the project variant would be compatible with the character-defining features of the district in terms of size and scale, massing and composition, and materials. Because the design of the project variant is identical in composition to the proposed project from the fourth floor up, overall the design would be compatible with the size and scale, massing and composition, and materials as mentioned above. However, the project variant would not retain the front façade of the historical resource and instead would incorporate a three-story base consisting of a regular rhythm of punched openings in a terra-cotta rainscreen. The project variant would not adversely affect the eligibility of the historic district as a whole because the design has been determined to be compatible with the character of the historic district. Therefore, this impact would be less than significant.

Impact CR-4: Construction activities for the proposed project or project variant could result in physical damage to adjacent historic resources. (Less than Significant with Mitigation)

Proposed Project or Project Variant.

Appendix A herein, the initial study in **section E.7, Noise**, analyzes potential construction vibration effects on adjacent structures. The initial study found that proposed project or project variant construction would generate vibration levels exceeding the threshold of 0.25 inches per second PPV at historic properties within 20 feet of the site. Such vibration levels would be capable

of cosmetically damaging the adjacent buildings to the east and west, 540 O'Farrell Street and 570 O'Farrell Street. The initial study **section F, Mitigation Measures** includes **Mitigation Measure M-NO-2: Construction Vibration Controls**, which would avoid substantial adverse vibration effects on adjacent buildings. Implementation of **Mitigation Measure NO-2** would reduce vibration-related impacts during project demolition and construction activities to less-than-significant levels.

Therefore, proposed project or project variant vibration impacts on adjacent historic architectural resources would be less than significant with mitigation incorporated.

Cumulative Impacts

Impact C-CR-1: The proposed project or project variant, in combination with past, present, and reasonably foreseeable future projects in the project vicinity, could result in a significant cumulative impact on historic architectural resources in the Uptown Tenderloin Historic District. (Less than Significant)

Proposed Project and Project Variant

The geographic context for an evaluation of cumulative impacts on the Uptown Tenderloin Historic District (UTHD, district) is that area within the district boundaries. The proposed project or project variant would involve demolition of most or all of one historic resource and construction of a new building within the boundaries of the district. As described above under Impact CR-3, the proposed project or the project variant would not adversely affect the eligibility of the historic district as a whole because their designs have been determined to be compatible with the character of the historic district in terms of size and scale, massing and composition, and materials.

The planning department has identified environmental cases within the district boundaries as a means to analyze potential adverse, cumulative effects on the UTHD. Projects either under review or approved since the establishment of the historic district are listed in **Table 3-1: Proposed, Ongoing, and Completed Projects in the Uptown Tenderloin Historic District**, p. 3-22.

As noted above, three contributors have been previously demolished, which resulted in 406 remaining contributors. The demolition of an individual resource and district contributor at 121 Golden Gate Avenue was identified as causing a significant impact to the district in 2011 (2005.0869E; EIR certified March 24, 2011).³¹ The analysis for this project found that the demolition would have a measurable adverse impact on this historic district, and that the proposed project

³¹ 121 Golden Gate Avenue Project Final EIR, San Francisco Planning Department Case No 2005.0869ECV, Adopted March 24, 2011. Accessed May 16, 2020. <https://commissions.sfplanning.org/cpcpackets/2005.0869ECV.pdf>

would have a cumulative historic architectural resource impact. In this scenario, it was determined that the demolition of a highly visible contributor at the corner of Golden Gate Avenue and Jones Street at the southernmost edge of the UTHD boundary would have a significant impact on the cohesiveness of the district by removing a substantial architectural corner feature and reducing the legibility of the district's boundary. Despite the loss of this district contributor, the department determined that the proposed project would enhance the urban character of the neighborhood, and more importantly would be compatible with the UTHD (2005.0869ECV, Planning Commission Motion 18301, March 24, 2011, p. 10).³²

The department determined that the other two demolition projects regarding contributors would not cause an impact to the district. The department determined that the demolition of the contributing building at 651 Geary Street, a garage that was later converted into an office building, would not have an impact on the district, and furthermore, found the new construction of a 13-story mixed-use building to be compatible with the character-defining features of the district (2014.0482ENV, categorical exemption issued June 20, 2016). The department also determined the demolition of 719 Larkin Street, a one-story commercial building, would not cause an impact on the District because the block would still contain a large number of contributing buildings and the District still contained numerous one-story commercial contributing buildings throughout the district. The department also found the new construction of the 8-story mixed use building to be compatible with the character defining features of the district (2015-005329ENV, categorical exemption issued May 11, 2017). Therefore, the department concluded that the district continues to express its historical significance through the remaining over 400 contributors.

In addition to the proposed development at 550 O'Farrell Street, **Table 3-1: Proposed, Ongoing, and Completed Projects in the Uptown Tenderloin Historic District**, p. 3-22, six proposed or ongoing projects that involve contributing structures. Two projects do not involve demolition of the contributing structures (229 Ellis Street, 2016-007593ENV, categorical exemption issued February 12, 2018; and 479 Ellis Street, 2016-015401ENV, categorical exemption issued July 17, 2017). Four proposed or ongoing projects on sites that involve substantial alterations or demolition of contributory structures (469 Eddy Street, 135 Hyde Street, 450 O'Farrell Street, and 245 Hyde Street). Two of these projects were found not to result in substantial adverse changes to the district (469 Eddy Street, 2014.0562ENV, categorical exemption issued February 16, 2016; and 135 Hyde Street, 2015-015203ENV, categorical exemption issued March 5, 2018), one project was previously found to not result in adverse changes to the district but is currently under review

³² *Ibid*, footnote 31, p. 3-31

again (450 O'Farrell Street), and one project is only in the preliminary stages of review (245 Hyde Street).

Seven proposed or ongoing projects are located on noncontributing properties: all are infill construction on parking lots or vacant sites. The new development with six of those projects were determined to be compatible with the character of the district. Therefore, those projects would not result in substantial adverse changes to the district. One infill project on a noncontributing site is under review and no determination of impacts on the district has been made (180 Jones).

Therefore, there are three projects within the UTHD currently under review, two which affect contributing buildings (450 O'Farrell Street and 245 Hyde Street), and one of which is an infill project on a parking lot (180 Jones Street). 450 O'Farrell Street, which includes demolition of three district contributors, was previously found to not cause a significant project or cumulative impact to the district with mitigation (2013.1535ENV, EIR certified November 13, 2018). The department found that the loss of these contributing buildings, located along the district's eastern boundary, would not impact the district to a degree that its cohesiveness and comprehensibility as a historic resource would be materially impaired. Revisions to the proposed design are currently under review. The other project that involves a demolition or substantial alteration to a contributor is 245 Hyde Street, although this project is currently under review and impacts to the district have not been determined. Lastly, there is one project currently under review that involves infill on parking lot.

In terms of loss of building types, among 21 contributing garage buildings within the district, three have been converted to different uses (two commercial and one police station). As listed in **Table 3-1: Proposed, Ongoing, and Completed Projects in the Uptown Tenderloin Historic District**, above, one approved project will retain the façade of an existing garage and two projects that will demolish existing garages have been approved. Therefore, about 77 percent of contributing garage buildings would remain in that use after the proposed partial or complete demolition of 550 O'Farrell Street or other projects under review or development.

In summary, the total number of original contributors to the UTHD was 409 at the time of its listing. Three total contributors have been demolished since listing (651 Geary, 121 Golden Gate, and 719 Larkin), bringing the total number of extant contributors to 406. In summary there are a total of six contributing buildings that are currently proposed for demolition or substantial alteration as part of current or ongoing projects, in addition to the proposed project. Two contributing buildings are proposed to be demolished or substantially altered under the projects at 469 Eddy and 135 Hyde, another three are proposed for demolition or alteration under the project at 450 O'Farrell, and a sixth building potentially proposed for demolition or substantial alteration under the project at 245 Hyde. The proposed project at 550 O'Farrell would bring the number to seven total demolition or substantial alterations currently under consideration. This

seven is in addition to the three contributors that have already been demolished, bringing the total number of contributors down to 399 from the original 409.

Construction of cumulative projects that involve impact equipment (e.g., pile driving, impact hammers/hoe rams, jackhammers) could generate ground-borne vibration that could damage adjacent historical resources. It is possible that the proposed project or project variant and cumulative projects in the vicinity could undergo construction activities that would use impact equipment simultaneously that could affect the same receptor(s). Initial study **section E.7, Noise** analyzes potential cumulative groundborne vibration and noise impacts. As discussed in that section, the proposed project or project variant in combination with cumulative project construction could result in significant cumulative vibration impacts on adjacent historic resources, to which the proposed project or project variant would make a substantial contribution. However, the proposed project or project variant would be required to implement **Mitigation Measure M-NO-2: Construction Vibration Controls**, as detailed in initial study **section F, Mitigation Measures**, which would reduce its contribution to these impacts to less-than-significant levels.

Based on the above analysis, the planning department has determined that the concentration of past, present, and reasonably foreseeable future projects within the Uptown Tenderloin Historic District would not affect the historic fabric or character such that the district would no longer be eligible for listing on the National Register or the California Register. The identified demolitions are found primarily along the edges of the district and not primarily concentrated in any specific locus. Nor are the proposed projects removing or altering a significant building type or style such that a significant property type would no longer be represented in the district. In a district of almost 400 contributing resources, the Uptown Tenderloin Historic District would retain and express its historic significance. As discussed above, there is a potential for cumulative vibration impacts on adjacent historic resources that contribute to the Uptown Tenderloin Historic District. However, implementation of **Mitigation Measure M-NO-2: Construction Vibration Controls** would reduce groundborne vibration and protect adjacent historical resources during construction and would therefore reduce the contribution of the project or project variant to any cumulative vibration impacts to less than significant levels. Overall, cumulative development projects proposed, under review, or approved in the historic district would not result in adverse impacts on the historic district's integrity or eligibility for the National Register or the California Register.

The proposed project or the project variant would therefore not contribute to a substantial adverse cumulative change to the Uptown Tenderloin Historic District and cumulative impacts would be less than significant.

4. OTHER CEQA ISSUES

This chapter discusses the following topics in relation to the proposed project: growth inducement potential, significant environmental effects that cannot be avoided if the project is implemented, significant irreversible environmental changes that would result if the proposed project is implemented, and areas of controversy and issues to be resolved.

A. GROWTH-INDUCING IMPACTS

This section analyzes the growth-inducement potential of the proposed project, as required by CEQA Guidelines section 15126.2(d). A project is considered growth-inducing if it would directly or indirectly foster substantial employment or population growth, or the construction of substantial number of additional housing units. Examples of projects likely to result in significant adverse growth inducement include extensions or expansions of infrastructure systems beyond what is needed to serve planned growth, and development of new residential subdivisions in areas that are sparsely developed or undeveloped. The project would be located on an infill site, surrounded on all sides by urban uses, and would not result in the extension of infrastructure into undeveloped areas. Population growth that would result from the proposed project or project variant would be limited to the project site itself and the proposed project or project variant would not directly or indirectly induce growth beyond the project site.

As discussed in **section E.3, Population and Housing**, p. 20, in the IS (see Appendix A), the proposed project or project variant would result in a net increase in housing and a net increase in jobs on the project site as follows: an increase of 111 to 116 dwelling units and approximately 255 to 267 residents, and an increase of approximately 1,300 sf of ground-floor retail/residential amenity space. Based on the retail uses on the project site, the new businesses would employ approximately five full-time employees. The project would also employ about three persons for leasing, management, and maintenance services. The proposed project or project variant's inclusion of 111 to 116 new dwelling units would provide additional housing that could be used by future employees at the site.

The proposed project or the project variant also would not indirectly induce substantial population growth in the project area because it would be located on an infill site in an urbanized area and would not involve any extensions to area roads or other infrastructure that could enable additional development in currently undeveloped areas.

For the above reasons, the additional residents and employees associated with the proposed project or project variant would have a less-than-significant impact related to unplanned population growth, both directly and indirectly, and would not have a direct or indirect growth-inducing impact.

B. SIGNIFICANT UNAVOIDABLE IMPACTS

In accordance with CEQA section 21067 and CEQA Guidelines sections 15126(b) and 15126.2(b), this section identifies significant environmental impacts that could not be eliminated or reduced to less-than-significant levels by implementation of all identified mitigation measures. The findings of significant impacts are subject to final determination by the San Francisco Planning Commission as part of the certification process for this draft EIR.

As identified in **section 3.B, Historic Architectural Resources**, pp. 3-5, under Impact CR-1, the proposed project or project variant would demolish most or all, respectively, of the 550 O'Farrell Street building, a historic resource as defined by CEQA. This complete or partial demolition would materially impair the significance of the 550 O'Farrell Street building and thus cause a substantial adverse impact on an individual historic resource; therefore, demolition or partial demolition of the 550 O'Farrell Street building would be considered a significant impact under CEQA. Implementation of mitigation measures **M-CR-1a: Documentation**, **M-CR-1b: Interpretation**, and **M-CR-2: Salvage**, would lessen the impact of the proposed demolition (complete or partial) of the 550 O'Farrell Street building. However, these mitigation measures would not reduce this impact to a less-than-significant level. Moreover, there is no feasible mitigation measure that could avoid this project-related historic architectural resource impact. Therefore, the impact to the individually eligible historic resource on the project site would remain significant and unavoidable.

C. SIGNIFICANT IRREVERSIBLE CHANGES

In accordance with sections 15126.2(c) and 15127 of the CEQA Guidelines, an EIR must identify any significant irreversible environmental changes that could result from implementation of the proposed project. Such significant irreversible environmental changes may include current or future uses of non-renewable resources, secondary or growth-inducing impacts that commit future uses of nonrenewable resources, and secondary or growth-inducing impacts that commit future generations to similar uses. According to the CEQA Guidelines, irretrievable commitments of resources should be evaluated to assure that such current consumption is justified. In general, such irreversible commitments include the uses of resources, such as energy and materials used to construct a proposed project, as well as the energy and natural resources (including water) that would be required to sustain a project and its inhabitants or occupants over the usable life of the project.

Consumption of nonrenewable resources includes increased energy consumption, conversion of agricultural lands, and lost access to mining reserves. As discussed in **section E.20, Energy**, pp. 136-138 and **section E.21, Agriculture and Forest Resources**, p. 138 of the IS (see **Appendix A**), the State Department of Conservation designates the site as "Urban and Built-Up Land," and the

site is located in an urbanized area of San Francisco. Therefore, no existing agricultural lands would be converted to non-agricultural uses. In addition, the project site does not contain known mineral resources and does not serve as a mining reserve; thus, development of the proposed project or project variant would not result in the loss of access to mining reserves. Refer to **section E.19, Mineral Resources**, p. 135 of the IS in **Appendix A**. Construction of the proposed project or project variant would require the use of energy, including energy produced from nonrenewable resources. Energy consumption would also occur during the operational period of the proposed project. As discussed in **section E.6, Transportation and Circulation** of the IS in **Appendix A**, pp. 32 to 47, the project site is in an area that is transit-rich and has relatively low vehicle miles travelled per capita compared to the rest of the Bay Area. Thus, implementation of the proposed project or project variant would not lead to a wasteful use of fuel. The proposed project or project variant would be required to incorporate green building features consistent with the City's Green Building Ordinance that are anticipated to result in additional reductions in energy use and greenhouse gas emissions. As discussed in **section E.9, Greenhouse Gas Emissions** of the IS in **Appendix A**, pp. 88 to 91, the proposed project or project variant would not result in any significant impacts associated with an increase in greenhouse gas emissions or conflict with measures adopted for the purpose of reducing such emissions because the project would be compliant with the City's Greenhouse Gas Reduction Strategy. Additionally, the proposed project or project variant would not require the construction of major new lines to deliver energy or natural gas as these services are already provided in the area. Therefore, the proposed project or project variant would not result in a significant impact associated with the consumption of nonrenewable resources.

No significant environmental damage, such as accidental spills or an explosion of a hazardous material, is anticipated with implementation of the proposed project or project variant. Compliance with federal, state, and local regulations would ensure that construction and operation activities at the project site would not result in the release of hazardous materials into the environment and that associated impacts would be less than significant (refer to **section E.18, Hazards and Hazardous Materials**, pp. 128 to 135 of the IS in **Appendix A**). As such, no irreversible changes – such as those that might result from construction of a large-scale mining project, a hydroelectric dam project, or other industrial project – would result from development of the proposed project or project variant.

D. AREAS OF KNOWN CONTROVERSY AND ISSUES TO BE RESOLVED

Publication of the NOP initiated a 30-day public review and comment period that began on March 6, 2019 and ended on April 5, 2019.³³ During the review and comment period, a total of 15 comments were submitted to the San Francisco Planning Department by interested parties. San Francisco Public Utilities Commission staff commented on water supply information to be addressed in the environmental documents. The Native American Heritage Commission commented on AB 52 tribal cultural resources notification and consultation requirements. Thirteen other responses commented on the NOP review schedule, project merits, construction noise and air quality impacts, views, parking, historic resources, and project alternatives.

The planning department has considered the comments made by the public in preparation of the IS and Draft EIR for the proposed project and project variant. There are no known areas of controversy or issues to be resolved.

³³ The NOP was filed with County Clerk at a later date, June 10, 2019, and the comment period was extended to July 10, 2019.

5. ALTERNATIVES

A. INTRODUCTION

This chapter identifies alternatives to the proposed project and the project variant and discusses potential environmental impacts associated with each alternative. CEQA Guidelines require the analysis of a reasonable range of alternatives to the proposed project or to the location of the project, which would feasibly attain most of the basic objectives of the project and avoid or substantially lessen any of the significant effects of the project (CEQA Guidelines section 15126.6). The range of alternatives required in an EIR is governed by a “rule of reason” that requires the EIR to set forth only those alternatives necessary to permit informed public participation and an informed and reasoned choice by the decision-making body (CEQA Guidelines section 15126.6(f)).

CEQA generally defines “feasible” to mean the ability to be accomplished successfully within a reasonable period of time, considering economic, environmental, social, technological, and legal factors. The following factors may also be taken into consideration when assessing the feasibility of alternatives: site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and the ability of the proponent to attain site control (CEQA Guidelines section 15126.6(f)(1)). An EIR need not consider every conceivable alternative but must consider a reasonable range of alternatives that will foster informed decision-making and public participation. City decision-makers could adopt an alternative instead of approving the proposed project or project variant if that alternative would substantially reduce or eliminate significant environmental impacts identified for the proposed project or project variant, the alternative is feasible, and the alternative would achieve most of the proposed project’s objectives. The final determination of feasibility will be made by decision-makers based on substantial evidence in the record, which includes but is not limited to information presented in the draft EIR, comments received on the draft EIR, and responses to those comments.

CEQA also requires that a No Project Alternative be evaluated (CEQA Guidelines section 15126.6[e]); the analysis of the No Project Alternative is based on the assumption that the project would not be approved. In addition, an environmentally superior alternative must be identified among the alternatives considered. The environmentally superior alternative is generally defined as the alternative that would result in the least adverse environmental impacts to the project site and affected environment. If the No Project Alternative is found to be the environmentally superior alternative, the EIR must identify an environmentally superior alternative among the other alternatives.

CEQA Guidelines section 15126.6(c) also requires an EIR to identify and briefly discuss any alternatives that were considered by the lead agency but were rejected as infeasible during the

scoping process. In identifying alternatives, primary consideration was given to alternatives that would reduce significant impacts while still meeting most of the basic project objectives. Those alternatives that would have impacts identical to or more severe than the proposed project or project variant, or that would not meet most of the project objectives, were rejected from further consideration.

As identified in **chapter 3, Environmental Setting and Impacts**, if implemented, the proposed project would result in a significant and unavoidable impact related to demolition of a historic architectural resource. Alternatives were selected that would substantially reduce or avoid most of the significant unavoidable impacts identified in this draft EIR.

The focus of the alternatives analysis is on the topic of historic architectural resources. All other environmental topics were identified as less than significant or less than significant with mitigation in the IS.

A.1 Summary of Project Alternatives.

The project sponsor; the project architects, Brick Architecture & Interiors; and historic preservation architects, Page & Turnbull, developed preservation alternatives for the 550 O'Farrell Street project. In consultation with planning department historic preservation staff, three preservation alternatives were identified: one full preservation alternative and two partial preservation alternatives. Page & Turnbull drafted a preservation alternatives memorandum presenting those alternatives in detail, including elevations and floor plans by the project architect.

The full preservation alternative included a four-story addition at the rear of the building. The two partial preservation alternatives would retain the main O'Farrell Street façade of the existing structure, with a new 13-story residential structure. The first partial preservation alternative would have the new tower set back about four feet from the O'Farrell Street façade. The second partial preservation would set back the new tower about 20 feet from the O'Farrell Street façade.

Consistent with Historic Preservation Commission resolution 0746 regarding evaluation of preservation alternatives in the EIR process, and planning department policy, the commission had the opportunity to provide early feedback on the draft alternatives.³⁴ On April 17, 2019, the commission reviewed the three draft preservation alternatives.³⁵ The commission found that those three alternatives represented a reasonable range of alternatives for EIR analysis that would avoid or reduce the significant adverse effects of the proposed project on historic architectural resources. Commission comments also noted that the four-story addition with the full

³⁴ 550 O'Farrell Street - Draft Project Preservation Alternatives, Page & Turnbull Architects, March 29, 2019.

³⁵ Meeting Notes from Review and Comment at the April 17, 2019 HPC Hearing for Preservation Alternatives for 550 O'Farrell Street, Case No. 2017-004557ENV, May 1, 2019.

preservation alternative could be increased by one or two floors with further setbacks, the setback above the retained façade with the second partial preservation alternative could be increased, and the lightwells of the partial preservation alternative should closely match those of adjoining buildings.

This EIR analyzes the proposed project with the retained elements design, which is a modified version of one of the partial preservation alternatives reviewed by the commission. This chapter analyzes the full preservation alternative and partial preservation alternative. In response to commission comments, the proposed project with retained elements has an increased hyphen above the retained façade, and the full preservation alternative is modified to include six stories with a stepped setback. The project team explored the possibility of having the light wells in the partial preservation alternative more closely match the neighboring lightwells but ultimately was not able to address that comment. Overall, the proposed project and the two preservation alternatives respond to the comments of the commission. This chapter thus compares three alternatives to the proposed project and the project variant:

- No Project Alternative,
- Full Preservation Alternative, and
- Partial Preservation Alternative.

Table 5-1: Comparison of Alternatives for CEQA Analysis below provides a comparison of the alternative features and impact summary. **Figure 5-1: Project Alternatives Overview**, p. 5-7, also illustrates the main design features of the proposed project, the project variant, and alternatives. The following discussion of historic resources impacts of the project alternatives is based upon an analysis prepared by Page & Turnbull included in **Appendix C-4** of this EIR.³⁶

A.2 No Project Alternative

CEQA Guidelines section 15126.6(e) requires that, among the project alternatives, a “no project” alternative be evaluated. CEQA Guidelines section 15126.6(e)(2) requires that the No Project Alternative analysis “discuss the existing conditions...as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and policies and consistent with the available infrastructure and community services.” As noted in CEQA Guidelines section 15126.6, “[s]uch a discussion would compare the environmental effects of the property remaining in its existing state against environmental effects that would occur if the project is approved” and “[i]f disapproval of the project under consideration would result in predictable actions by others, such as the proposal of some other project, this ‘no project’ consequence should be discussed.”

³⁶ 550 O’Farrell Street – Revised Project Preservation Alternatives, Page & Turnbull Architects, February 14, 2020.

Table 5-1: Comparison of Alternatives for CEQA Analysis

| | Proposed Project | Project Variant | No Project Alternative | Full Preservation Alternative | Partial Preservation Alternative |
|---|--|---|---|---|--|
| Description | | | | | |
| Project Height | 130 feet | 130 feet | 40 feet | 72 feet | 130 feet |
| Number of stories | 13 stories | 13 stories | 2 above-ground off-set parking levels | 6 stories | 13 stories |
| Total number of residential units | 111 | 116 | 0 | 36 | 111 |
| Depth of rear yard | 31 | 31 | 0 | 10 | 13 |
| Total Building Area (sf) | | | | | |
| Residential (includes lobby, amenity, mechanical, open space) | 104,960 gsf | 106,515 gsf | 0 | 42,030 gsf | 108,650 gsf |
| Retail/residential amenity | 1,300 gsf | 1,300 gsf | 0 | 1,000 gsf | 1,840 gsf |
| Bicycle spaces - class 1 | 156 | 156 | 0 | 72 | 156 |
| Bicycle spaces - class 2 | 8 | 8 | 0 | 8 | 8 |
| Parking spaces | 0 | 0 | 119 | 17 | 0 |
| Ability to Meet Project Sponsor's Objectives | | | | | |
| | Proposed Project would meet all of the project sponsor objectives. | Project Variant would meet all of the project sponsor objectives. | No Project Alternative would meet none of the project sponsor objectives. | Full Preservation Alternative would meet some of the project sponsor objectives. | Partial Preservation Alternative would meet some of the project sponsor objectives. |
| Historic Architectural Resources | | | | | |
| Historic Architectural Resources | Impact CR-1: The proposed project would retain the existing façade of 550 O'Farrell Street, with its Gothic-Revival detail, but demolition of most of the 550 O'Farrell Street building would result in a substantial adverse change to the significance of an individual historical | Impact CR-2: The demolition of the 550 O'Farrell Street building would result in a substantial adverse change to the significance of an individual historical architectural resource as defined by CEQA | No impact | Less-than-significant impact compared to the proposed project or the project variant. (LTS) | Similar impacts as the proposed project and project variant and would result in a substantial adverse change to the significance of an individual historical resource. Compared to the project variant, the Partial Preservation |

Table 5-1: Comparison of Alternatives for CEQA Analysis

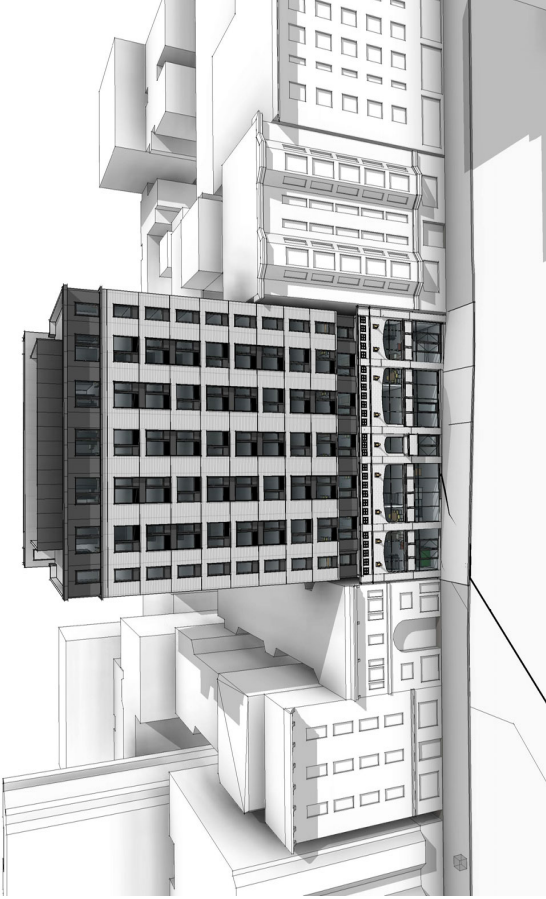
| | Proposed Project | Project Variant | No Project Alternative | Full Preservation Alternative | Partial Preservation Alternative |
|-----------------------------|---|--|------------------------|--|--|
| | architectural resource as defined by CEQA Guidelines section 15064.5(b). (SUM) | Guidelines section 15064.5(b). (SUM) | | | Alternative would have less impact. (SUM) |
| Off-Site Historic Resources | <u>Impact CR-3:</u> Demolition of most of the 550 O'Farrell Street building and new construction with the proposed project would not result in a substantial adverse change in the significance of the Uptown Tenderloin Historic District. (LTS) | <u>Impact CR-3:</u> Demolition of the 550 O'Farrell Street building and new construction with the project variant would not result in a substantial adverse change in the significance of the Uptown Tenderloin Historic District. (LTS) | No impact | Same as the proposed project. (LTS) | Same as the proposed project. (LTS) |
| Construction Impacts | <u>Impact CR-4:</u> Proposed project construction would generate excessive groundborne vibration or groundborne noise levels that could damage historic resources. (LSM) | <u>Impact CR-4:</u> Project variant construction would generate excessive groundborne vibration or groundborne noise levels that could damage historic resources. (LSM) | No impact. | Similar impacts as the proposed project and project variant. (LSM) | Similar impacts as the proposed project and project variant. (LSM) |

Table 5-1: Comparison of Alternatives for CEQA Analysis

| | Proposed Project | Project Variant | No Project Alternative | Full Preservation Alternative | Partial Preservation Alternative |
|---|---|--|------------------------|--|--|
| Cumulative | Impact C-CR-1: The proposed project, in combination with other past, present, and reasonably foreseeable future projects in the project vicinity, would not result in a significant cumulative impact on a historical architectural resource or the UTHD. (LTS) | Impact C-CR-1: The project variant, in combination with other past, present, and reasonably foreseeable future projects in the project vicinity, would not result in a significant cumulative impact on a historical architectural resource or the UTHD. (LTS) | No impact | Same as the proposed project or the project variant. (LTS) | Same as the proposed project or the project variant. (LTS) |
| | The proposed project could result in significant cumulative construction vibration impacts on district contributors. (LSM) | The project variant could result in significant cumulative construction vibration impacts on district contributors. (LSM) | No impact. | Same as the proposed project or the project variant. (LSM) | Same as the proposed project or the project variant. (LSM) |
| NI = no impact; LTS = less than significant impact; LSM = less than significant impact with mitigation; S = significant impact; SU = significant and unavoidable impact; SUM = significant and unavoidable impact with mitigation | | | | | |

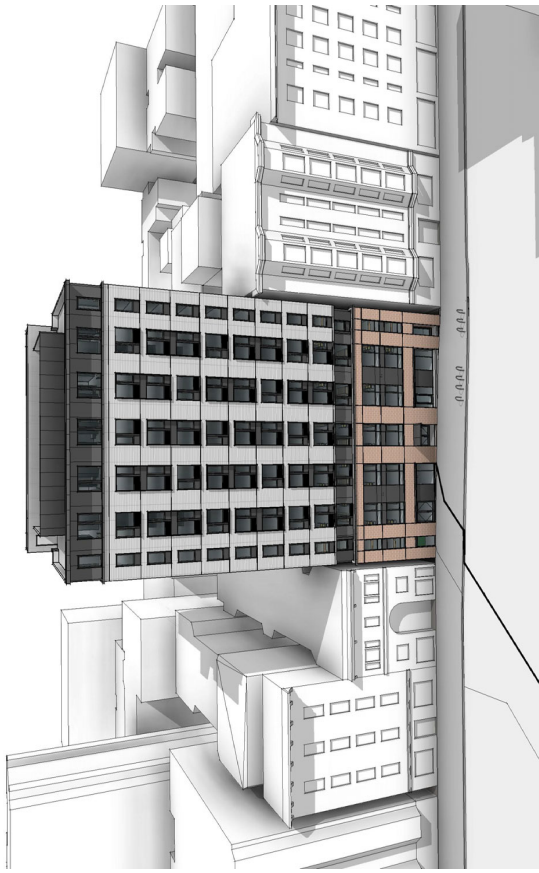
PROPOSED PROJECT

Maintain Existing Facade with 13 Levels of Type I Construction with no Setback from O'Farrell Street. A Vertical Hyphen at Level 4 is Setback from O'Farrell Street Creating Visual Separation Between Existing and New.



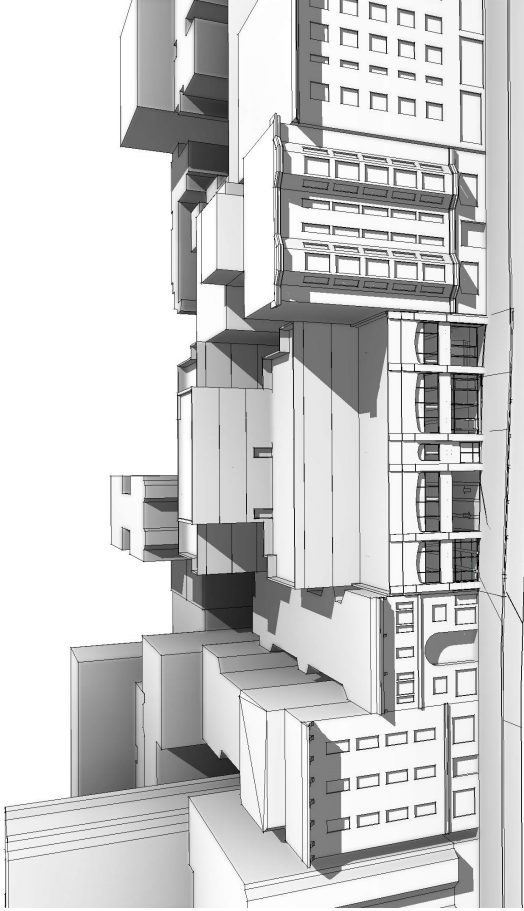
PROJECT VARIANT

13 Levels of Type I Construction with No Setback from O'Farrell Street. A Vertical Hyphen at Level 4 is Setback from O'Farrell Street Creating Visual Separation between Base and Tower Elements



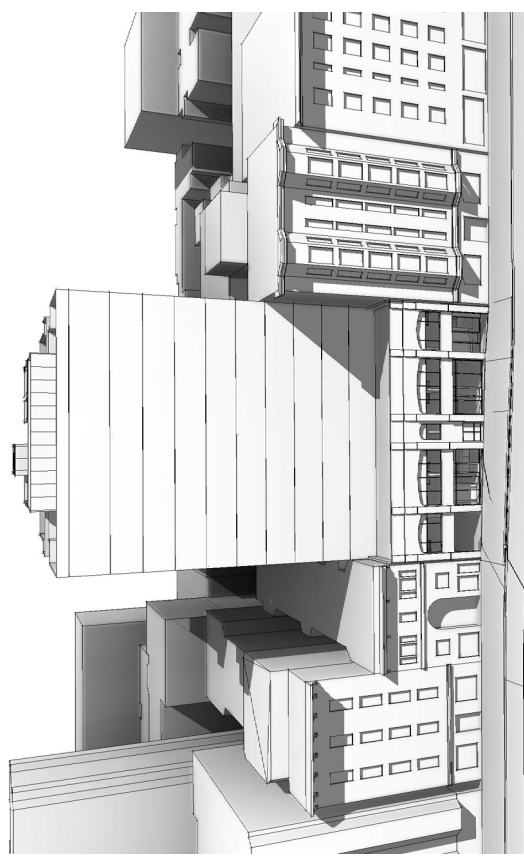
FULL PRESERVATION ALTERNATIVE

Maintain Front Half of Existing Building and Adaptively Re-use Interior. 2 Story Addition Setback 30 Feet with 2 Additional Stories at Rear of Building.



PARTIAL PRESERVATION ALTERNATIVE

Maintain Existing Facade with 13 Levels of Type I Construction Set back 18 Feet from O'Farrell Street.



550 O'FARRELL STREET PROJECT

SOURCE: BRICK, INC.

Description

Under the No Project Alternative, the existing conditions characterizing the 11,800-sf 550 O'Farrell project site would not change. Compared to the proposed project or the project variant, there would be no new construction of a mixed-use (residential and retail) building consisting of a 130-foot-tall tower, with 111 to 116 residential units, and 1,300 sf of retail/residential amenity space. There would be no changes to the circulation system that serves the project site. The No Project Alternative would not preclude future development of the site with a range of land uses that are permitted under existing zoning and land use regulations. The project site would remain under the existing zoning, density, and height and bulk standards, as defined by the planning code. Under the No Project Alternative, it is assumed that existing land uses – principally garage uses – would remain into the near future.

Impacts

Historic Architectural Resources

Under the No Project Alternative, the existing building at 550 O'Farrell Street would not be demolished. The building, which is a contributor to the Uptown Tenderloin Historic District and has been determined to be eligible for listing on the California Register of Historical Resources (CRHR), and thus is a historic resource under CEQA for purposes of this EIR, would be retained. Therefore, compared to the proposed project or the project variant, which would result in significant unavoidable project-level impacts to historic architectural resources, the No Project Alternative would not result in any impacts related to historic architectural resources.

Other Environmental Topics

Because there would be no physical changes on the project site under the No Project Alternative, the No Project Alternative would not change conditions in the following areas: land use and land use planning, population and housing, archeological resources and tribal cultural resources, transportation and circulation, noise, air quality, greenhouse gas emissions, wind, shadow, recreation, utilities and service systems, public services, biological resources, geology and soils, hydrology and water quality, hazards and hazardous materials, mineral resources, energy, agriculture and forest resources, and wildfire. Additionally, compared to the proposed project, the No Project Alternative would not have any significant impacts.

Ability to Meet Project Objectives

Because the project would not be implemented, the No Project Alternative would not achieve any of the project sponsor's objectives for the proposed project or project variant. In particular, objectives to create a high-density mixed-income residential development by fully using the site's zoning capacity of up to 118 dwelling units and incorporating on-site affordable units, replace an outdated parking garage with a mix of uses compatible with the surrounding Tenderloin

neighborhood, contribute to the City's goal of creating 30,000 additional housing units in an area identified for high-density housing in proximity to public transportation, and construct a new building that is compatible with the character of the Uptown Tenderloin Historic District (the district), an identified architectural resource, would not be achieved. Refer to **chapter 2, Project Description**, p. 2-1, for a complete list of the project objectives.

A.3 Full Preservation Alternative

Description

With the Full Preservation Alternative, the 550 O'Farrell Street building would be retained and rehabilitated as part of the proposed project. This alternative would have 36 residential units for a total of 42,030 residential sf (including residential common, circulation and mechanical space areas); one 1,000 sf ground-floor retail/residential amenity space; 17 vehicle parking spaces (14 basement-level spaces and three ground-level spaces); 72 class 1 bicycle parking stalls (all on ground level) and 8 class 2 bicycle parking spaces on the O'Farrell Street sidewalk. The alternative would have six total stories for a building height of about 72 feet. Approximately 16,200 sf (about 46 percent) of the historic building would be retained for adaptive re-use.

The Full Preservation Alternative would maintain the front half of the historic building with a four-story addition; the first two stories would be set back 30 feet from the primary (south) façade of the historic building and the top two stories would be set back about 67 feet from the primary façade, with a 10-foot deep rear yard. The existing structure (floors, ceilings, and columns) would be retained in the front half of the historic building and would be reused for the new building. The alternative would retain the parking access from O'Farrell Street with adjacent store-front openings. New construction and new uses in the front half of the historic building would require the removal of vehicular circulation ramps and would alter the appearance of the existing interior structure of the building such that it would not resemble the original structure. (See **Figure 5-2: Full Preservation Alternative - Basement Level Plan**, p. 5-12, **Figure 5-3: Full Preservation Alternative - Ground Floor (Level 1) Plan**, p. 5-13, **Figure 5-4: Full Preservation Alternative - Level 2 Plan**, p. 5-14, **Figure 5-5: Full Preservation Alternative - Levels 3 and 4 Plan**, p. 5-15, and **Figure 5-6: Full Preservation Alternative - Levels 5 and 6 Plan**, p. 5-16, illustrating uses and floor plans.)

The addition would be constructed behind and connected to the retained portion of the historic building and abut the west, north, and east property lines; there would be lightwells along the side façades. The rear of the historic building would be demolished to accommodate the addition. Some of the existing building's concrete construction and all of the character-defining plaster finish of the south façade would be retained; however, a new, modern materials palette would be introduced at the addition. The façades of the new addition would be designed with modern materials, such as precast concrete, metal paneling, or an integrated composite system. The Full

Preservation Alternative would require excavation for the foundation and structural work, as well as for the below-grade parking garage (see **Figure 5-7: Full Preservation Alternative - Building Section**, p. 5-17). **Figure 5-8: Full Preservation Alternative - Street-Level Views**, p. 5-18, illustrates the alternative.

The use of the property would change from parking to mixed-use residential/retail. The primary façade would be rehabilitated in conformance with the Secretary of the Interior's Standards for Rehabilitation, described in **chapter 3, section B. Historic Architectural Resources**, p. 3-5, above, with non-character-defining features removed, including the main entrance and the filled-in storefronts on the first-floor level. These missing features would be replaced with new features that would be compatible with the unchanged portions of the primary façade.

As with the proposed project or the project variant, the project sponsor anticipates that construction of the Full Preservation Alternative would span approximately 21 months, with three phases: (1) partial demolition, (2) excavation and shoring, and (3) construction. The construction equipment and staging for this alternative would also be similar to the proposed project or the project variant.

B. IMPACTS

B.1 Historic Architectural Resources

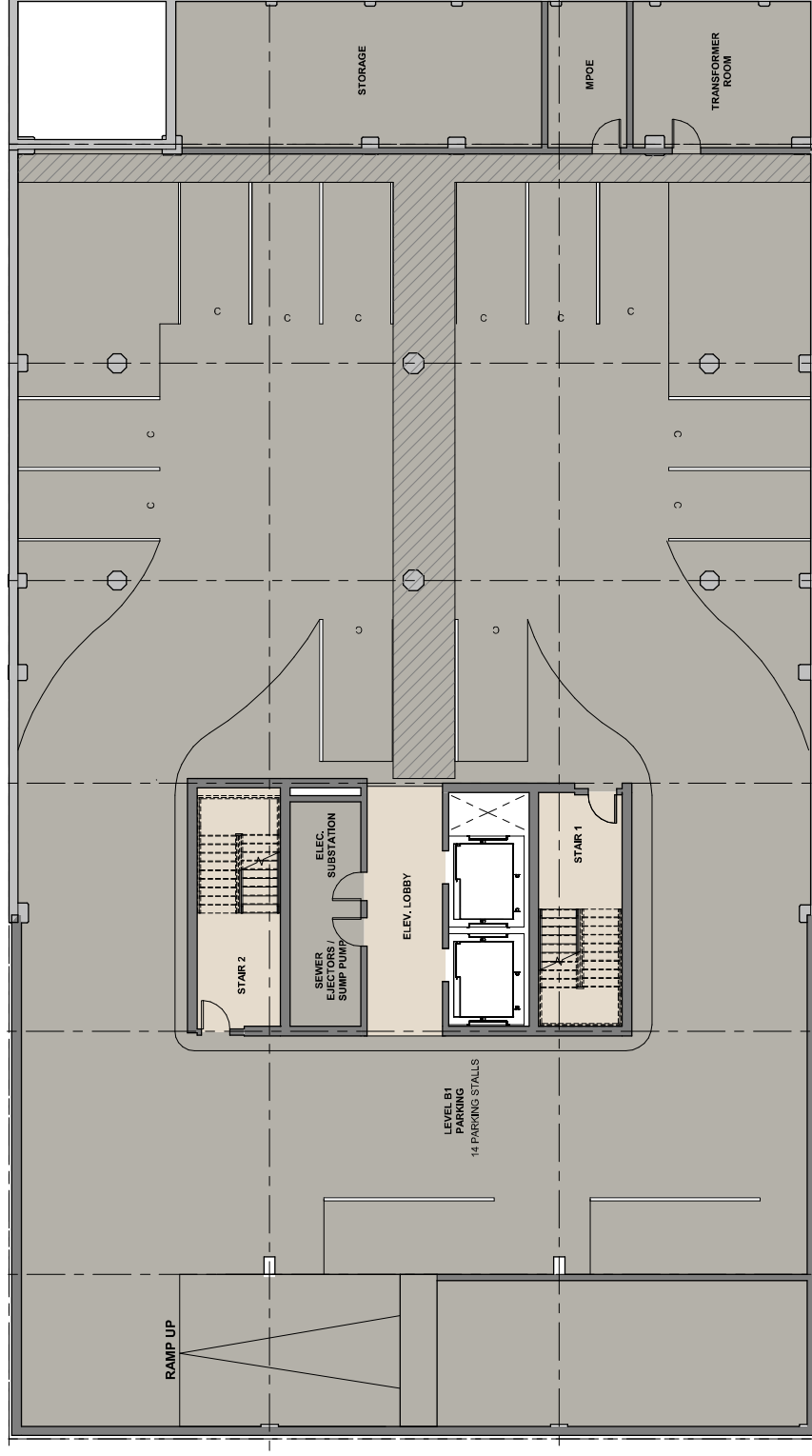
The Full Preservation Alternative would retain a majority of character-defining features of the historic resource at 550 O'Farrell Street in whole (see **Figure 3-2: 550 O'Farrell Street Building Character-Defining Features**, p. 3-18). The building's massing and reinforced concrete construction with arched wood-truss roof system would be partially retained. All other character-defining features and spatial relationships would be fully retained. The Full Preservation Alternative would meet all of the Secretary of the Interior's Standards for Rehabilitation, described in **section 3.B.1 Historic Architectural Resources**, p. 3-5 above, and would avoid the physical loss of an individually significant historical resource. CEQA guidelines section 15064.5(b)(3) includes a presumption that a project that complies with the secretary's standards would generally have a less-than-significant impact on a historical resource. Therefore, no mitigation measures for historic resource impacts would be required for the Full Preservation Alternative, unlike with the proposed project or the project variant. As the Full Preservation Alternative would comply with the rehabilitation standards, it would not adversely affect the historic resource, and would not have a significant impact under CEQA, as compared to the significant unavoidable impacts of the proposed project or the project variant. As with the proposed project and the project variant, with the large ratio of contributing to non-contributing buildings, the loss of one contributing building in the district would not substantially reduce the ratio of contributory to non-contributory buildings and would not prevent the district from conveying its historical significance. As with the proposed project and the project variant, the Full

Preservation Alternative would implement mitigation measures to reduce groundborne vibration and protect adjacent historical resources during construction. As with the proposed project and the project variant, the Full Preservation Alternative would not result in an impact on the Uptown Tenderloin Historic District nor would the project contribute to adverse cumulative impacts on the district.

B.2 Environmental Topics Analyzed in the Initial Study

Under the Full Preservation Alternative with its reduced development, project impacts related to the intensity of development as identified in the IS, such as population and housing, recreation, utilities and service systems, and public services, would be correspondingly reduced as compared to the proposed project or the project variant, and would continue to be less than significant. Operational impacts related to transportation, noise, air quality, greenhouse gas emissions, and energy also would be reduced given the reduced building size, compared with the proposed project or project variant, and also would be less than significant. Other impacts for environmental topics related to the footprint and location of the proposed development, such as land use and land use planning, hazards and hazardous materials, mineral resources, agriculture and forest resources, and wildfire would be the same as or very similar to the impacts of the proposed project and would be less than significant, as with the proposed project or project variant.

Construction-related activity associated with development of the project site would result in comparable impacts under the proposed project, the project variant, and the Full Preservation Alternative for environmental topics such as archeological resources, tribal cultural resources, noise, and air quality. This is because excavation and construction would be similar for the proposed project, project variant, and the alternative. As with the proposed project, these impacts would be less than significant with implementation of applicable mitigation measures identified in the IS, which would be applicable to the Full Preservation Alternative.

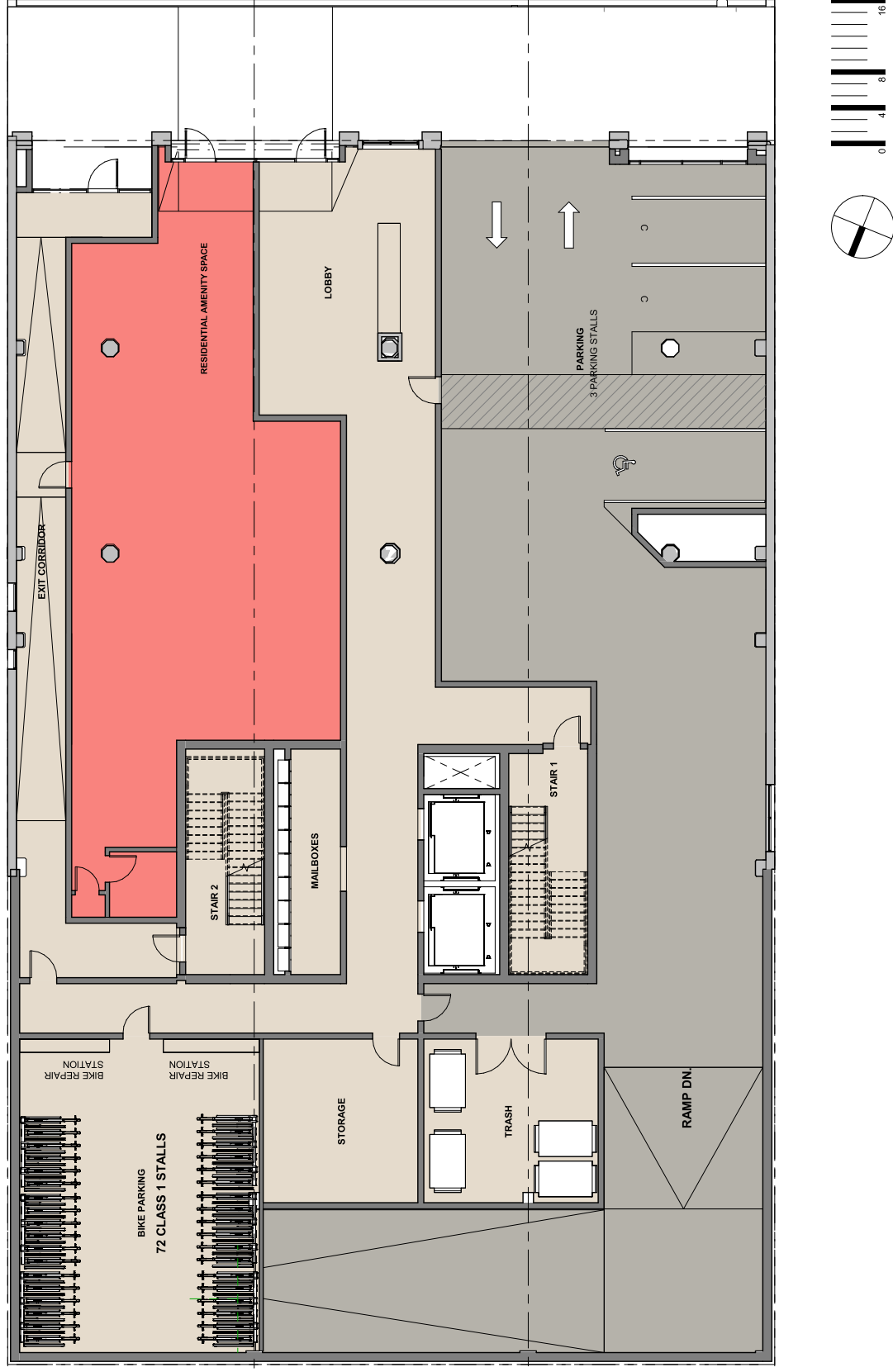


SOURCE: BRICK INC.

550 O'FARRELL STREET PROJECT

Case No. 2017-004557ENV

FIGURE 5-2: Full Preservation Alternative – Basement Plan

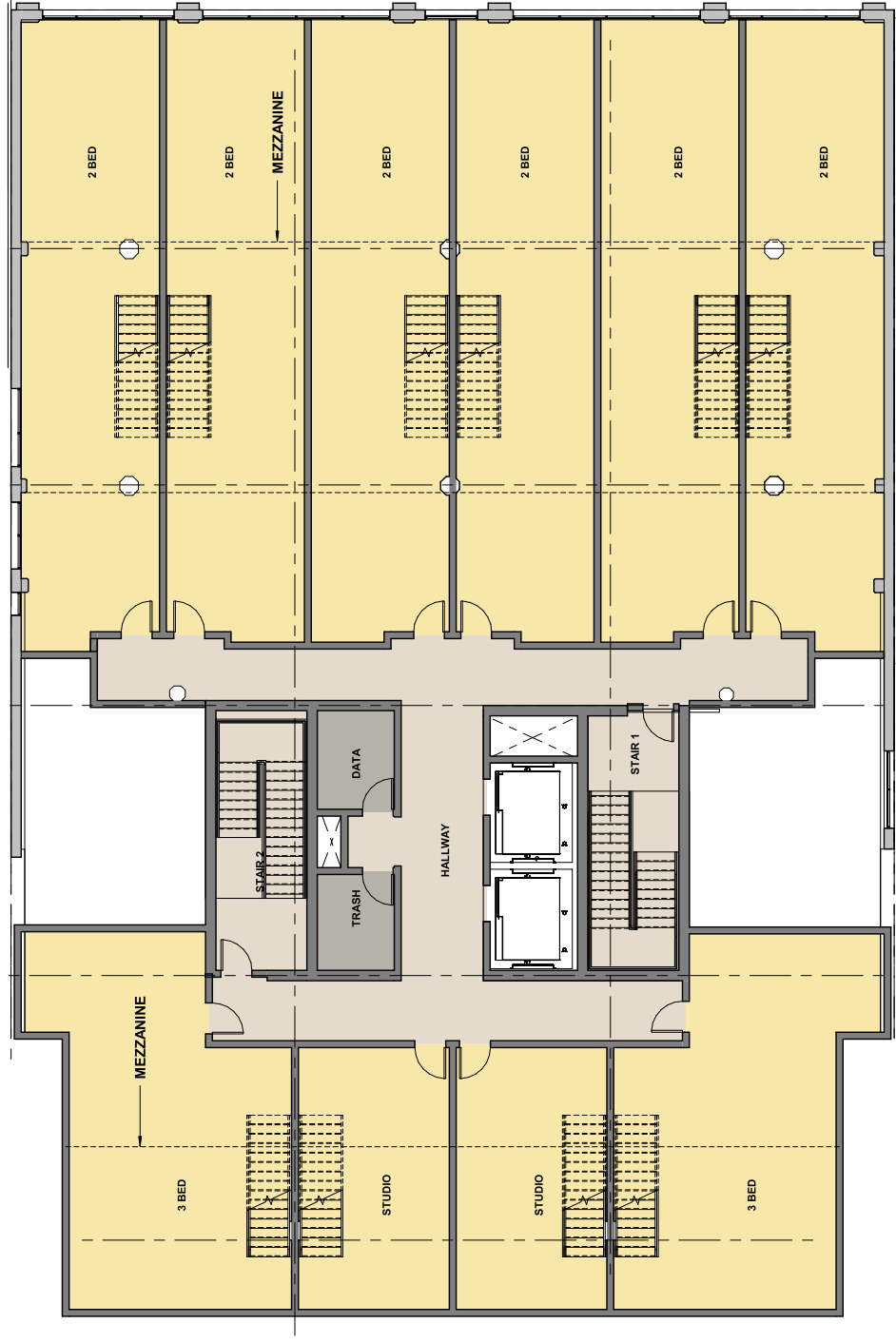


SOURCE: BRICK INC.

550 O'FARRELL STREET PROJECT

Case No. 2017-004557ENV

FIGURE 5-3: Full Preservation Alternative – Ground Floor (Level 1) Plan

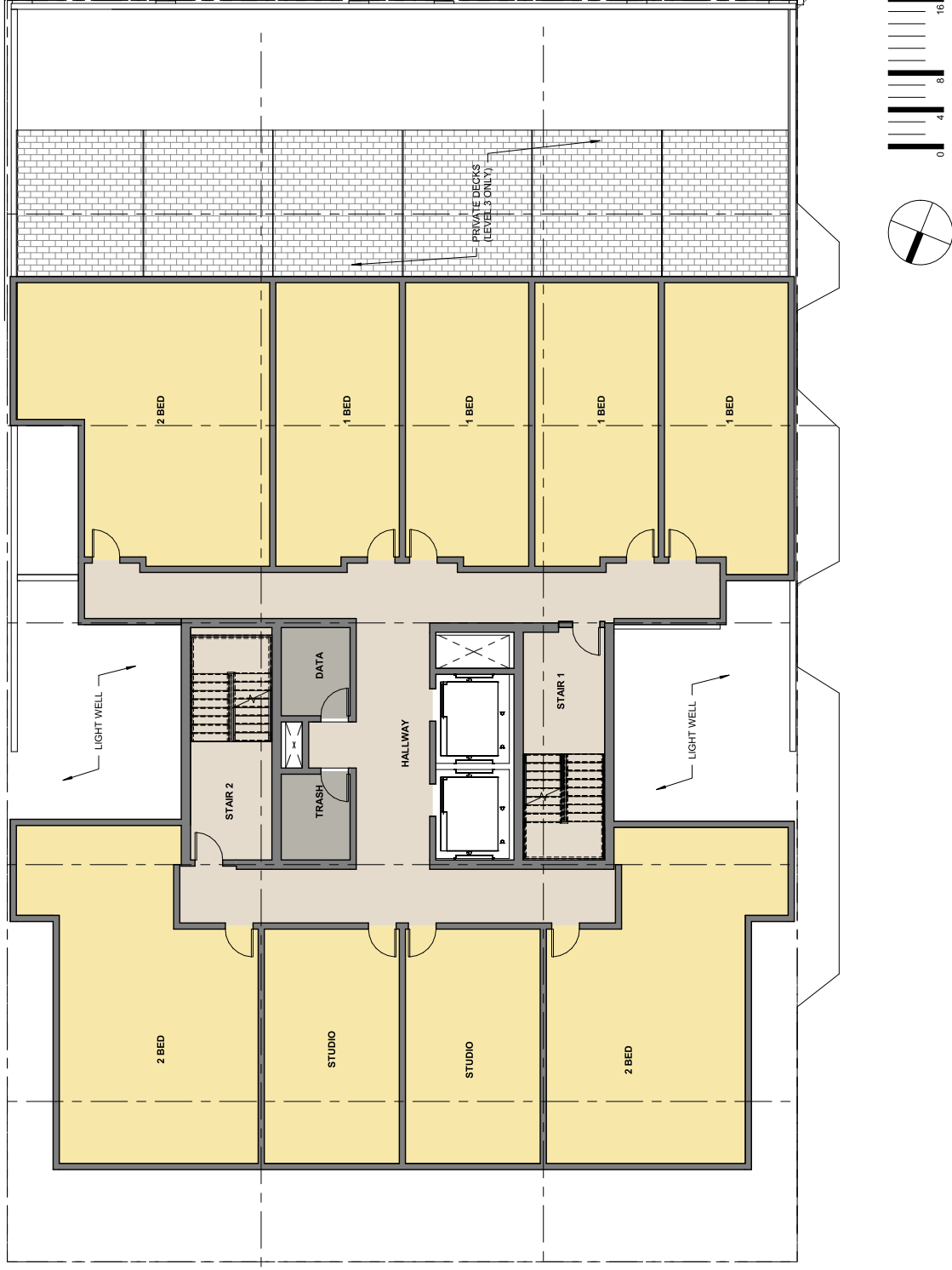


SOURCE: BRICK INC.

550 O'FARRELL STREET PROJECT

Case No. 2017-004557ENV

FIGURE 5-4: Full Preservation Alternative – Level 2 Plan

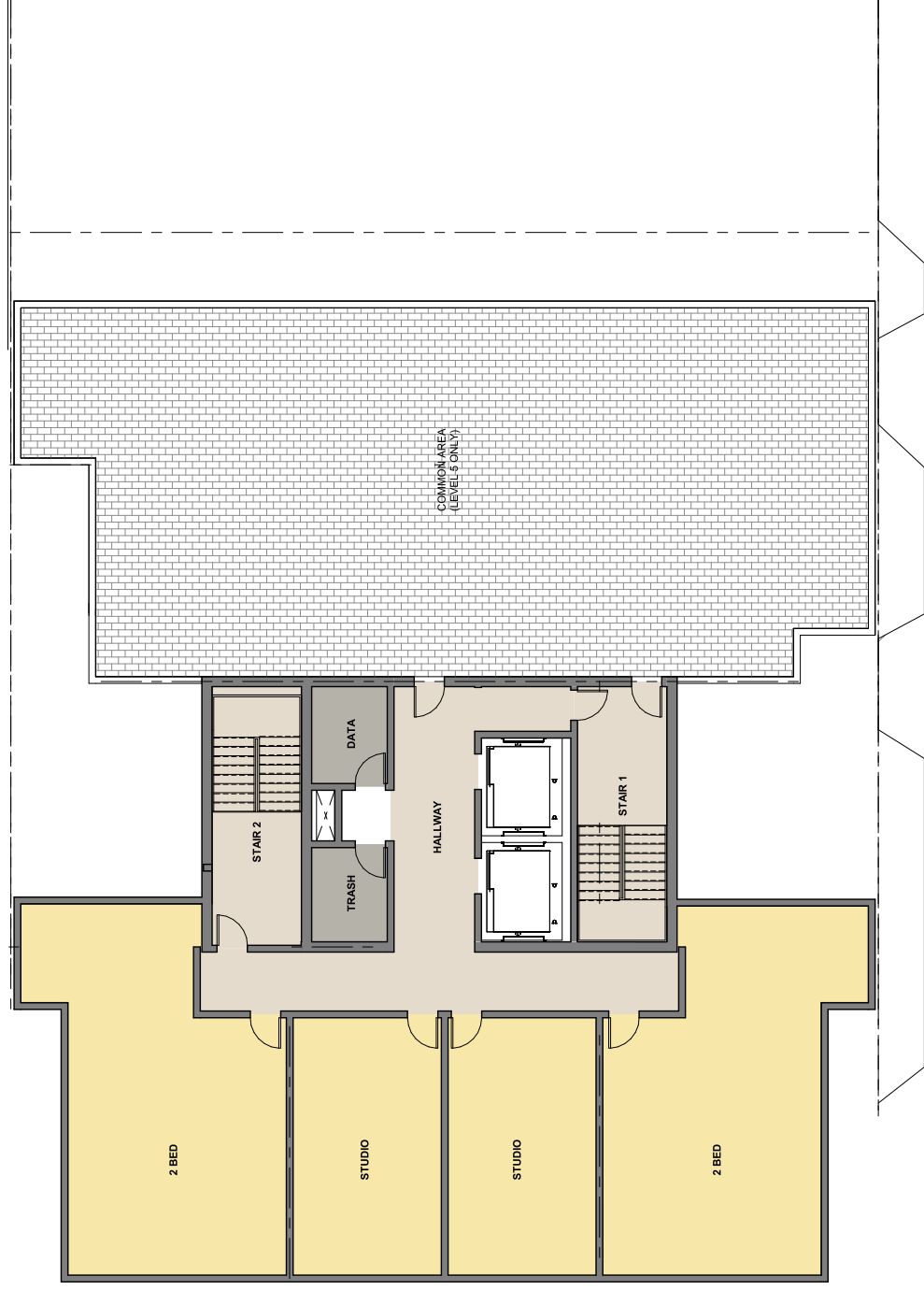


SOURCE: BRICK INC.

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FIGURE 5-5: Full Preservation Alternative – Levels 3 and 4 Plan

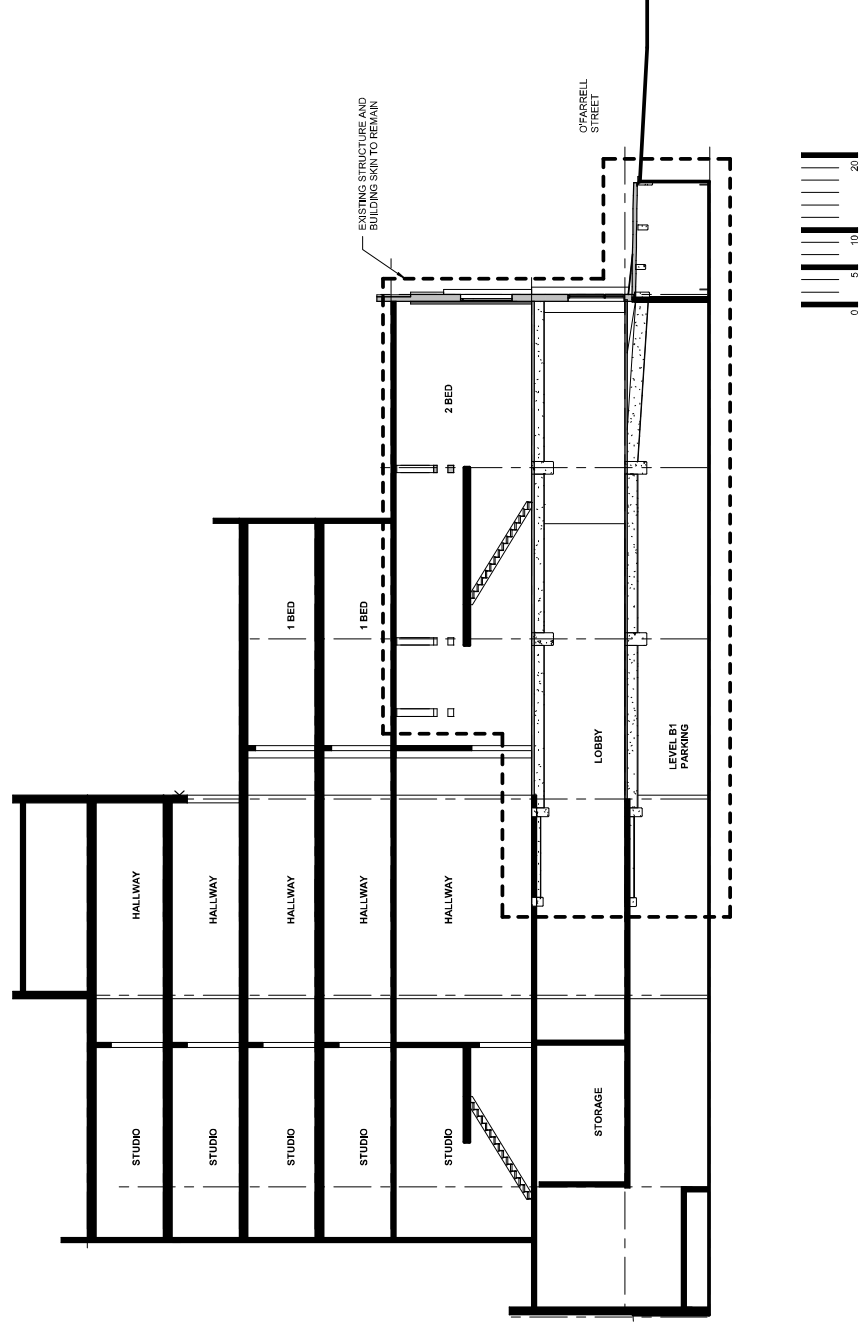


SOURCE: BRICK INC.

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FIGURE 5-6: Full Preservation Alternative – Levels 5 and 6 Plan

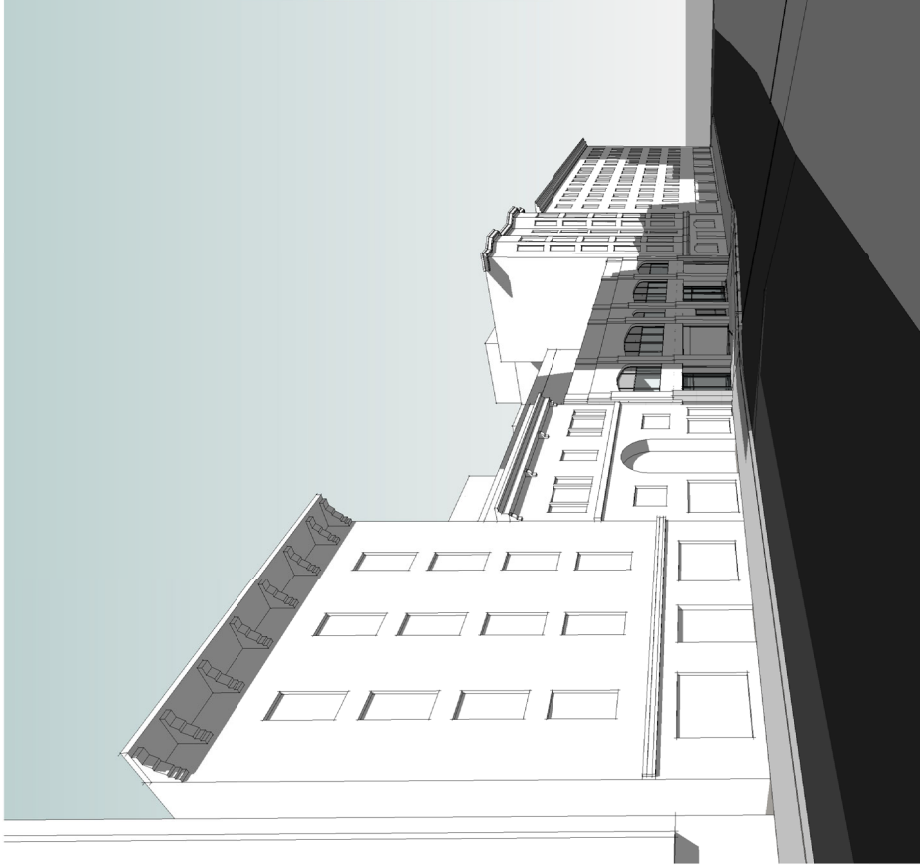


SOURCE: BRICK INC.

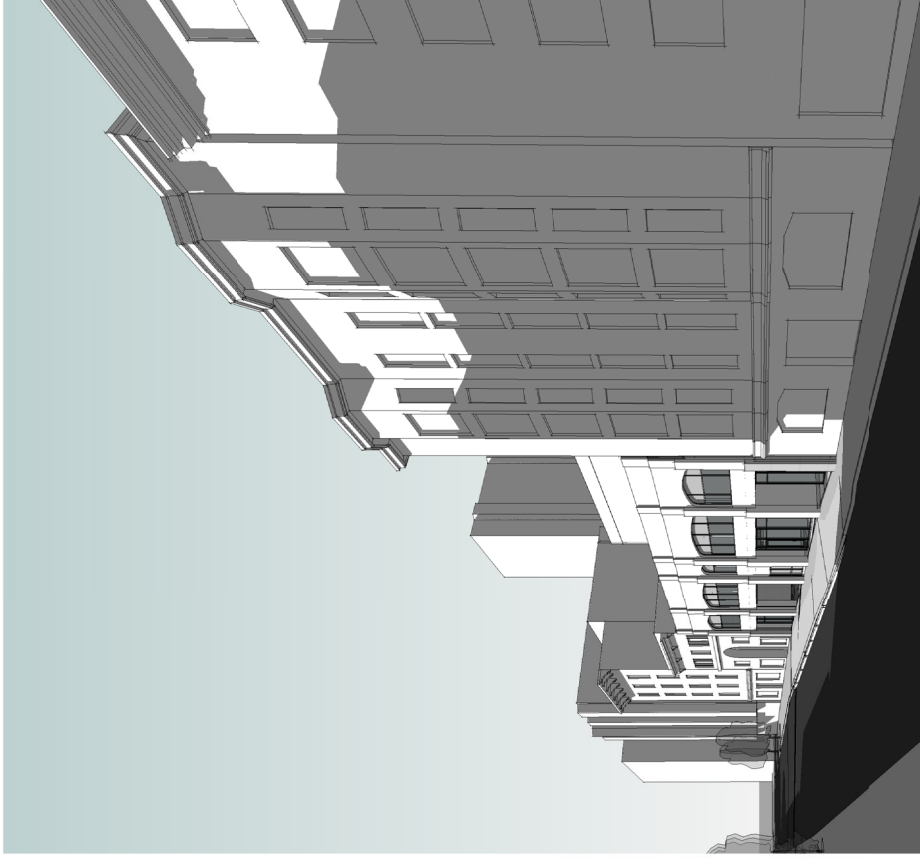
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FIGURE 5-7: Full Preservation Alternative – Building Section



1 PERSPECTIVE LOOKING EAST



2 PERSPECTIVE LOOKING WEST

SOURCE: BRICK INC.

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FIGURE 5-8: Full Preservation Alternative – Street Level Views

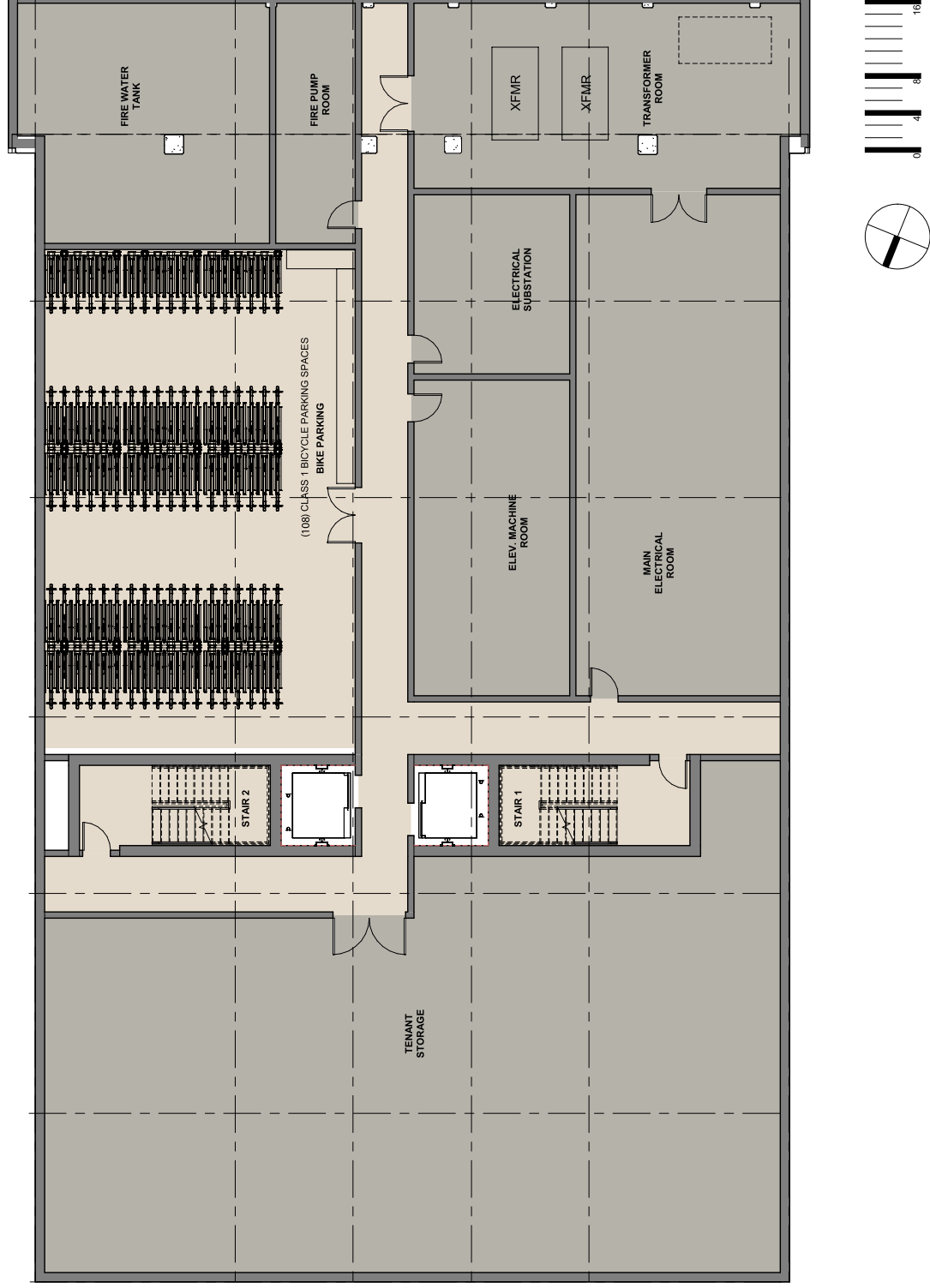
B.3 Ability to Meet Project Objectives

The Full Preservation Alternative would meet some of the project objectives, including the redevelopment of an underused site. In particular, objectives to replace an outdated parking garage with a mix of uses compatible with the surrounding Tenderloin neighborhood and incorporating on-site affordable units; contribute to the City’s goal of creating 30,000 additional housing units in an area identified for high-density housing in proximity to public transportation; and construct a new building that is compatible with the character of the district, and provides adequate access to light and air for all housing units. By reducing the size of the residential building, the Full Preservation Alternative would provide 36 units, 75 to 80 fewer units (about 60 percent fewer) as compared to the proposed project with 111 units or the project variant with 116 units, with a corresponding reduction in affordable housing units, and thus would not meet the objective to create a high-density mixed-income residential development using the site’s zoning capacity of up to 118 units. The Full Preservation Alternative would not meet the project objective of providing adequate access to light and air to all housing units because the rear yard would be only 10 feet in depth. As with the proposed project and the project variant, this alternative would require the Zoning Administrator to grant a rear yard modification. As a result, this alternative would not fully meet the project objectives of developing the site at an intensity and density that takes advantage of the area’s transit resources. In addition, the cost to construct the Full Preservation Alternative would be only slightly lower than the proposed project, but the reduction in units would result in a lower economic return, which would not fully meet the project objective related to economic feasibility. See **chapter 2, Project Description, section 2.B, Project Sponsor Objectives**, p. 2-43, for a complete description of the project objectives.

B.4 Partial Preservation Alternative

Description

The Partial Preservation Alternative would include 111 residential units for a total of 108,650 residential sf (including residential common and circulation areas); one 1,840 sf ground floor retail/residential amenity space; 156 class 1 bicycle parking stalls (108 basement-level stalls and 48 ground-level stalls), and 8 class 2 bicycle parking spaces on the O’Farrell Street sidewalk. The alternative would have 13 stories for a building height of 130 feet. The addition would be set back 18 feet from the O’Farrell Street façade, and the rear yard would be reduced with a width of 13 feet. See **Figure 5-9: Partial Preservation Alternative - Basement Level Plan**, p. 5-20, **Figure 5-10: Partial Preservation Alternative - Ground Floor (Level 1) Plan**, p. 5-21, **Figure 5-11: Partial Preservation Alternative - Level 2 Plan**, p. 5-21., **Figure 5-12: Partial Preservation Alternative - Level 3 Plan**, p. 5-23, **Figure 5-13: Partial Preservation Alternative - Level 4 Plan**, p. 5-24, **Figure 5-14: Partial Preservation Alternative - Levels 5-12 Plan**, p. 5-25, and **Figure 5-15: Partial Preservation Alternative - Level 13 Plan**, p. 5-26, illustrating uses and floor plans. Approximately 200 sf of the historic building would be retained at the primary (south) O’Farrell Street façade.

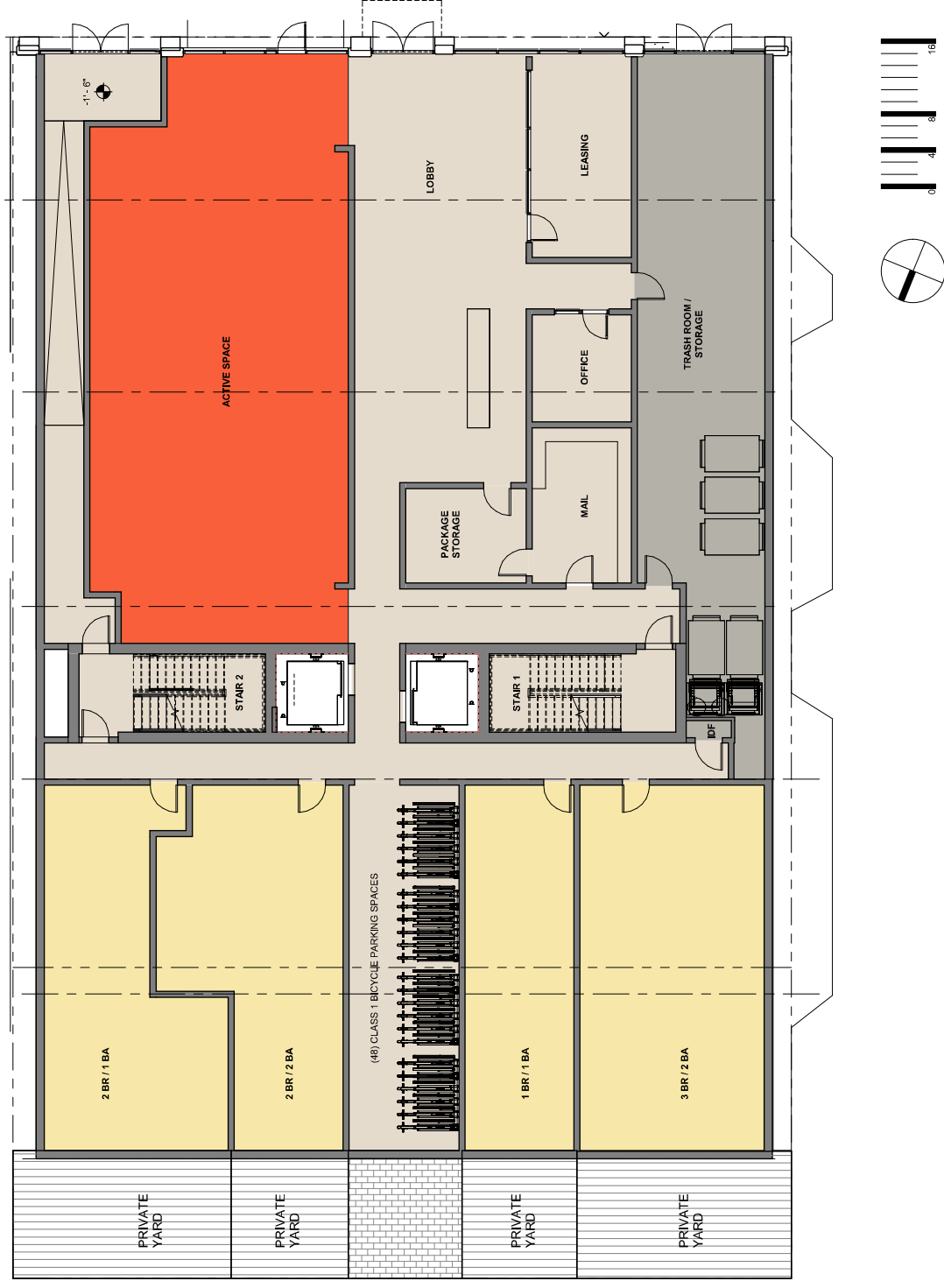


SOURCE: BRICK INC.

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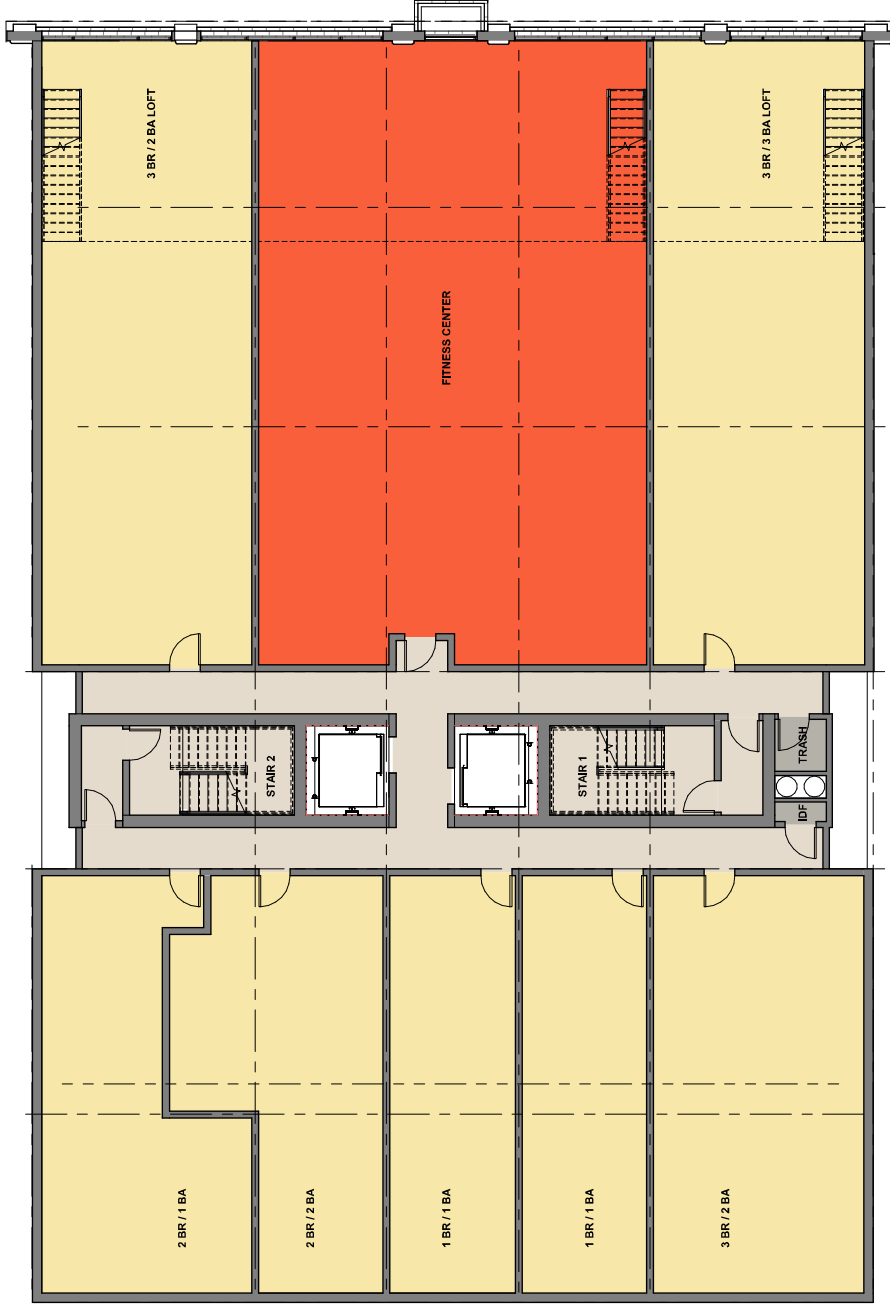
FIGURE 5-9: Partial Preservation Alternative – Basement Level Plan



SOURCE: BRICK INC.

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FIGURE 5-10: Partial Preservation Alternative – Ground Floor (Level 1) Plan

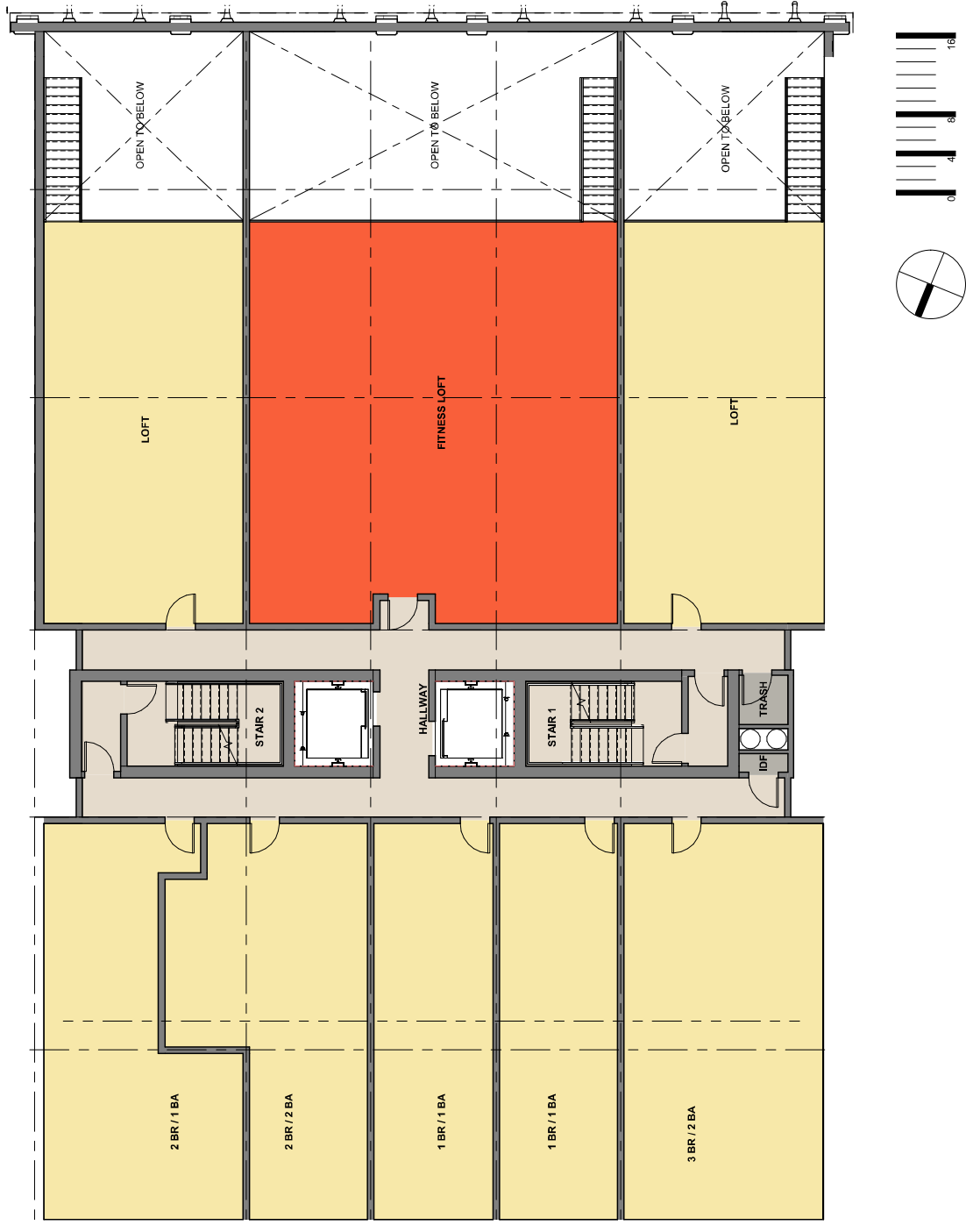


SOURCE: BRICK INC.

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FIGURE 5-11: Partial Preservation Plan – Level 2 Plan



SOURCE: BRICK INC.

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FIGURE 5-12: Partial Preservation Alternative – Level 3 Plan

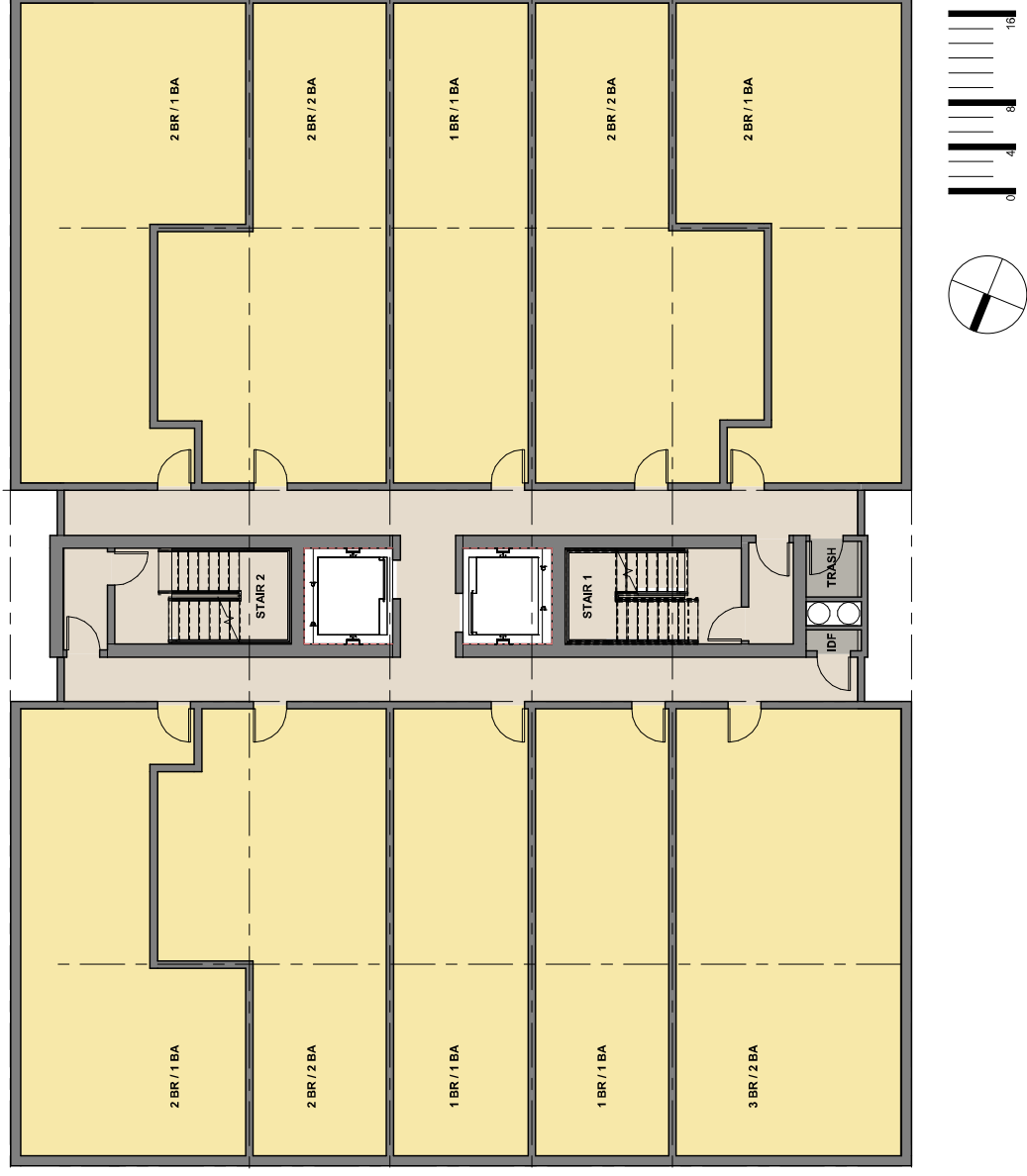


SOURCE: BRICK INC.

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FIGURE 5-13: Partial Preservation Alternative – Level 4 Plan

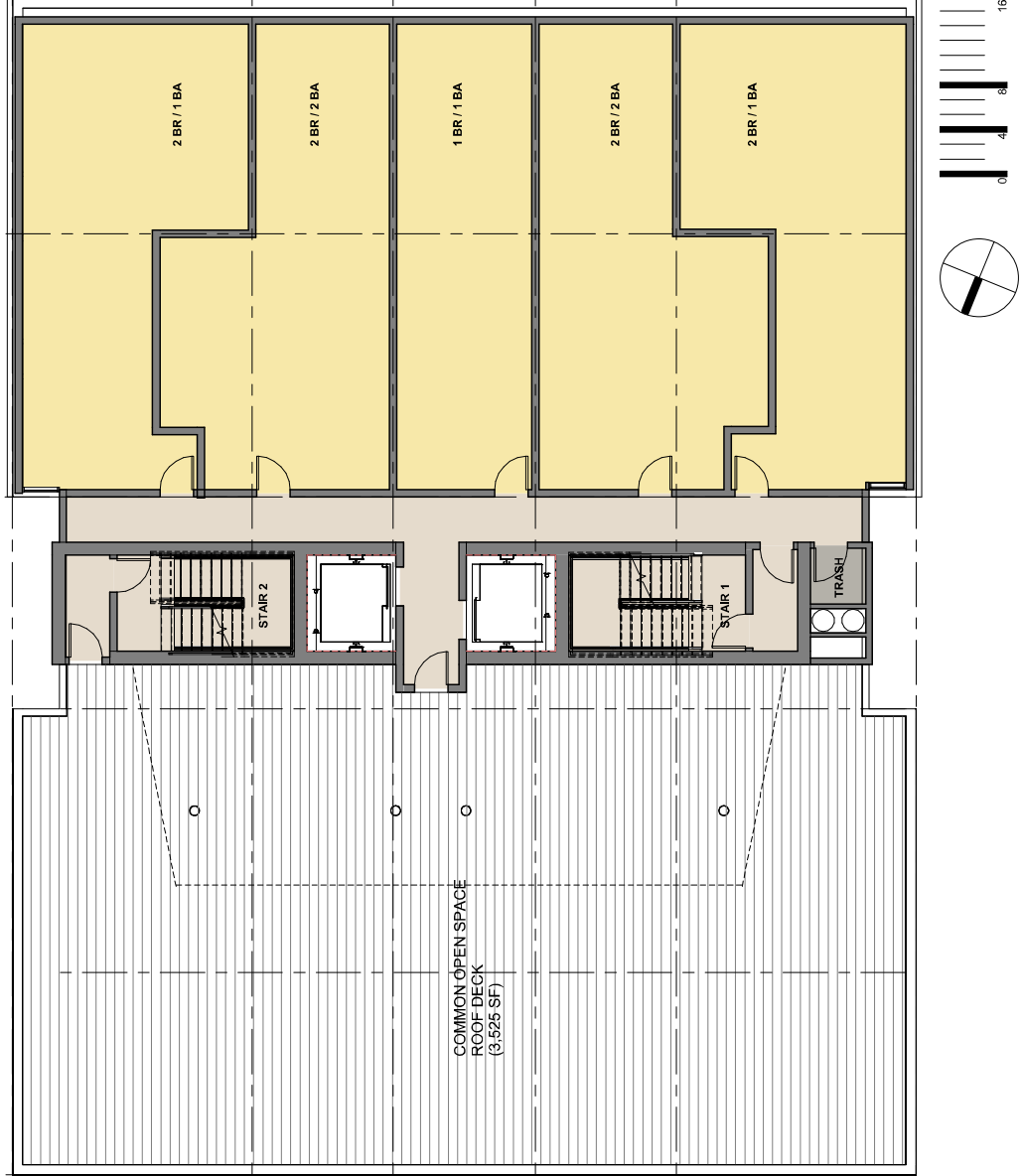


SOURCE: BRICK INC.

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FIGURE 5-14: Partial Preservation Alternative – Levels 5-12 Plan



SOURCE: BRICK INC.

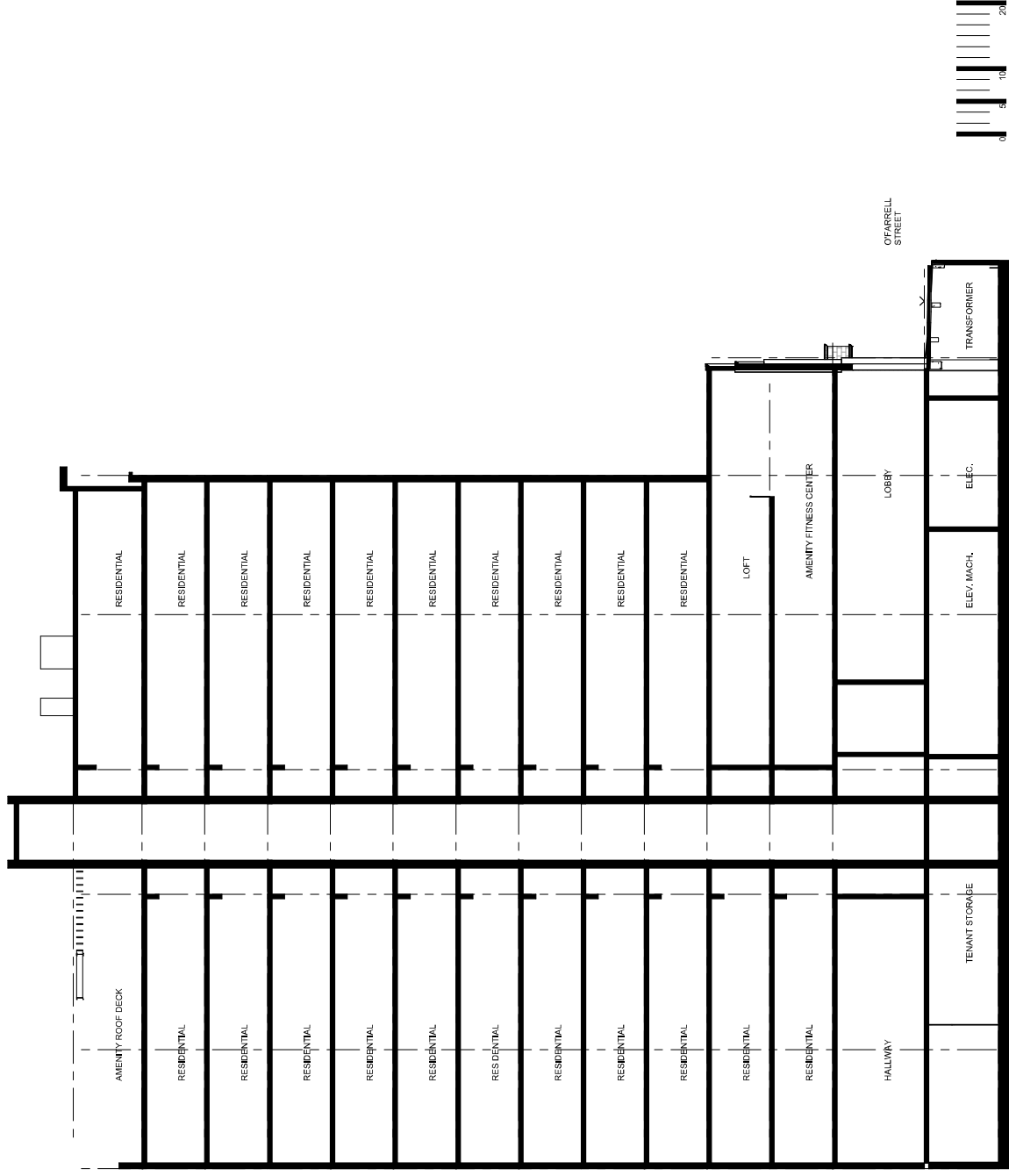
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FIGURE 5-15: Partial Preservation Alternative – Level 13 Plan

The Partial Preservation Alternative would feature a new 13-story building with an 18-foot setback from the primary façade of the historic building. Residential and other uses on levels 2 through 13 of the Partial Preservation Alternative would be similar to the proposed project and project variant floor plans but, as noted above, would be set back 18 feet from the existing garage façade, compared to the proposed project or project variant where the upper floors would rise directly above the existing façade plane, except for a 3-foot-deep setback at the fourth floor. The rectangular-plan building would abut the west and east property lines and be set back 13 feet from the north property line. The north façade, east façade, west façade, roof, and interior of the historic building would be demolished to accommodate the new structure. The rear yard of the Partial Preservation Alternative would be reduced to 13 feet in depth, requiring the Zoning Administrator to grant a rear yard modification and a unit exposure variance. With the Partial Preservation Alternative, some of the building's concrete construction and all of the character-defining plaster finish of the O'Farrell Street façade would be retained; a new, modern materials palette would be introduced. The façades of the new building would be designed with a durable modern material, such as precast concrete, metal paneling, or an integrated composite system. The Partial Preservation Alternative would require excavation for the foundation and structural work (see **Figure 5-16: Partial Preservation Alternative - Building Section**, p. 5-28). **Figure 5-17: Partial Preservation Alternative - Street-Level Views**, p. 5-29, illustrates the alternative.

As with the proposed project or the project variant, the project sponsor anticipates that construction of the Partial Preservation Alternative would span approximately 21 months and would be conducted in three phases: (1) demolition, (2) excavation and shoring, and (3) construction. The construction equipment and staging for this alternative would also be similar to the proposed project.

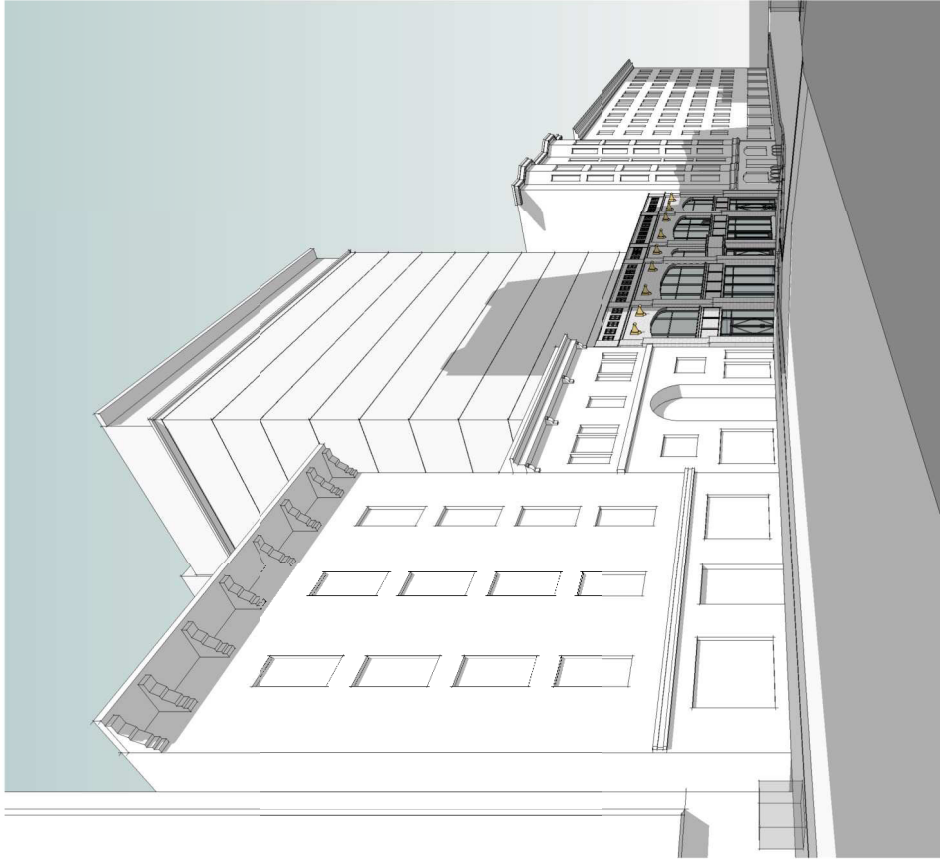


SOURCE: BRICK INC.

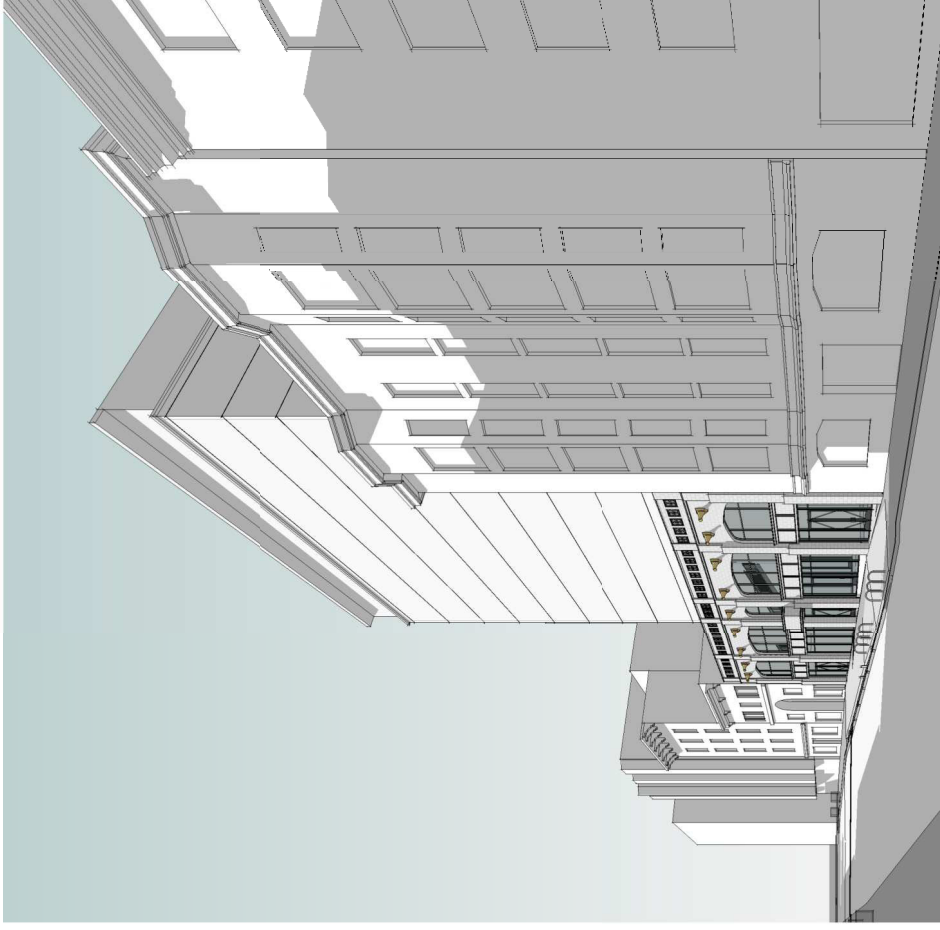
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FIGURE 5-16: Partial Preservation Alternative – Building Section



1. O'FARRELL VIEW EAST



2. O'FARRELL VIEW WEST

SOURCE: BRICK INC.

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FIGURE 5-17: Partial Preservation Alternative – Street Level Views

Impacts

Historic Architectural Resources

The purpose of the Partial Preservation Alternative is to consider a plan that would lessen the significant impacts of the proposed project on the existing historic resource. A Partial Preservation Alternative “would preserve as many features of the resource that convey its historic significance as possible while taking into account the potential feasibility of the proposed alternative and the project objectives.”³⁷ The Partial Preservation Alternative would retain the architecturally significant primary façade of the existing historic resource at 550 O’Farrell Street and construct a new 13-story, mixed-use (primarily residential) building behind it, where the ten stories above the historic primary façade would have an 18-foot setback. Although the primary façade contains a majority of the historic resource’s character-defining features that would be preserved, the demolition of the remainder of the building (including the loss of the character-defining low-scale two-story massing and reinforced concrete construction with arched wood-truss roof system) would destroy a fair amount of the resource’s historic materials and form. The Partial Preservation Alternative would significantly alter the historic resource’s spatial relationships with its site and environment. The building’s low-scale two-story massing and reinforced concrete construction with arched wood-truss roof system would not be retained.

The Partial Preservation Alternative would comply with five of the ten Secretary of the Interior’s Standards for Rehabilitation.³⁸ As with the proposed project, the Partial Preservation Alternative would also partially retain the historic resource, including its distinctive Gothic-Revival façade; the structure and spaces that constitute the historic resource as a building would be demolished. The Partial Preservation Alternative’s 18-foot setback of the new 13-story tower would allow the lower scale of the retained portion of the garage to be perceived from the street, compared to the new tower with the proposed project rising directly above the garage façade with no setback.

Compared to the project variant, which would demolish all of the 550 O’Farrell Street structure, the Partial Preservation Alternative, which would retain the primary façade, would have less impact on the historic resource.

Overall, the Partial Preservation Alternative would, therefore, cause a material impairment to the historic resource, and the impact would continue to be significant and unavoidable with mitigation. In comparison, the Full Preservation Alternative would reduce the impact to a less-than-significant level. The Partial Preservation Alternative would have a significant adverse effect on an individually significant resource. As with the proposed project and the project variant, with

³⁷ Historic Preservation Commission Resolution No. 0746, March 18, 2015.

³⁸ *550 O’Farrell Street – Revised Project Preservation Alternatives*, Page & Turnbull Architects, February 14, 2020.

the large ratio of contributing to non-contributing buildings, the loss of one contributing building in the district would not substantially reduce the ratio of contributory to non-contributory buildings and would not prevent the district from conveying its historical significance. As with the proposed project and the project variant, the Partial Preservation Alternative would implement mitigation measures to reduce groundborne vibration and protect adjacent historical resources during construction. Compared to the proposed project and project variant, the Partial Preservation Alternative would not maintain the district's pattern of buildings built to the street without setbacks. Nonetheless, the Partial Preservation Alternative would not result in a substantial adverse change to the district and cumulative impacts would be less than significant.

Environmental Topics Analyzed in the IS

With the Partial Preservation Alternative, operational impacts such as population and housing, transportation, noise, air quality, wind, shadow, greenhouse gas emissions, recreation, utilities and service systems, and public services and energy would be similar to the proposed project and the project variant. These impacts would be increased relative to the Full Preservation Alternative but would remain less than significant. Because the excavation and footprint of the building would be the same, impacts for environmental topics related to the footprint and location of the proposed development, such as land use and land use planning, hazards and hazardous materials, mineral resources, agriculture and forest resources, and wildfire would be the same as or very similar to the impacts of the proposed project and the project variant and would be less than significant, as with the Full Preservation Alternative.

Construction-related activity associated with development of the project site would result in comparable impacts under the proposed project, the project variant, and the Partial Preservation Alternative for environmental topics such as archeological resources, tribal cultural resources, noise, and air quality. This is because excavation and construction would be similar for the proposed project and this alternative. As with the proposed project, these impacts would be less than significant with implementation of applicable mitigation measures identified in the IS, which would be applicable to the Partial Preservation Alternative.

Ability to Meet Project Objectives

The Partial Preservation Alternative would meet most of the project objectives, including the redevelopment of an underused site. In particular, objectives to create a high-density mixed-income residential development using the site's zoning capacity of to 118 units and incorporating on-site affordable units; replace an outdated parking garage with a mix of uses compatible with the surrounding Tenderloin neighborhood; contribute to the City's goal of creating 30,000 additional housing units in an area identified for high-density housing in proximity to public transportation; and construct a new building that is compatible with the character of the district. The Partial Preservation Alternative would provide 111 units, as with the proposed project, and

compared to 116 units with the project variant. The Partial Preservation Alternative would not meet the project objective of providing adequate access to light and air to all housing units because the rear yard would be only 13 feet in depth.

In addition, the cost to construct the Partial Preservation Alternative would be higher than the proposed project or project variant, which would not fully meet the project objective related to economic feasibility. See **chapter 2, Project Description, section 2.B, Project Sponsor Objectives**, p. 2-1, for a complete description of the project objectives.

C. ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Pursuant to CEQA Guidelines section 15126.6(e)(2), an EIR is required to identify the environmentally superior alternative from among the alternatives evaluated if the proposed project has significant impacts that cannot be mitigated to a less-than-significant level. The Environmentally Superior Alternative is the alternative that best avoids or lessens any significant effects of the proposed project, even if the alternative would impede to some degree the attainment of the project objectives. The No Project Alternative is considered the overall environmentally superior alternative, because the significant impacts associated with implementation of the proposed project would not occur with the No Project Alternative. The No Project Alternative, however, would not meet any of the objectives of the project sponsor.

If the No Project Alternative is environmentally superior, CEQA requires selection of the “environmentally superior alternative other than the no project alternative” from among the proposed project and the other alternatives evaluated. The proposed project and the project variant would result in significant and unavoidable project-level impacts related to historic architectural resources. The Full Preservation Alternative would result in less-than-significant impacts related to historical architectural resources. The Full Preservation Alternative would comply with the rehabilitation standards, it would not adversely affect the historic resource, and would not have a significant impact under CEQA, as compared to the significant unavoidable impacts of the proposed project or the project variant. Thus, the Full Preservation Alternative would be the environmentally superior alternative.

D. ALTERNATIVES CONSIDERED BUT REJECTED

CEQA Guidelines section 15126.6(c) also requires an EIR to identify and briefly discuss any alternatives considered by the lead agency but were rejected as infeasible during the scoping process. In identifying alternatives, primary consideration was given to alternatives that would reduce significant impacts while still meeting most of the basic proposed project objectives. The discussion below describes the alternatives considered and provides the reasons for eliminating other alternatives from detailed consideration in the EIR.

As discussed in **B. Summary of Project Alternatives**, above, this EIR analyzes the proposed project with the retained elements design, one of the two partial preservation alternatives reviewed by the Historic Preservation Commission, and the full preservation alternative and a second partial preservation alternative in this chapter. In response to commission comments, the proposed project with retained elements would have an increased setback above the retained façade and the tower above, and the full preservation alternative was modified to include six stories with a stepped setback. The proposed project, project variant, and the two preservation alternatives are consistent with those presented to the commission,

No other alternatives that would avoid or reduce project impacts on historic architectural resources and which would feasibly attain most of the basic objectives of the project were identified or considered.

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