

DRAFT ENVIRONMENTAL IMPACT REPORT

1101–1123 Sutter Street Project

CITY AND COUNTY OF SAN FRANCISCO
PLANNING DEPARTMENT
CASE NO. 2019-022850ENV

STATE CLEARINGHOUSE NO. 2020120320

Public Draft Number 01	Draft EIR Publication Date:	AUGUST 18, 2021
	Draft EIR Public Hearing Date:	SEPTEMBER 15, 2021 AND SEPTEMBER 30, 2021
	Draft EIR Public Comment Period:	AUGUST 18, 2021 – OCTOBER 5, 2021



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ACRONYMS AND ABBREVIATIONS

APN	Assessor's Parcel Number
ARB	Air Resources Board
ARG	Architectural Resources Group
ARR	Archaeological Resources Report
BART	Bay Area Rapid Transit District
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
city	City and County of San Francisco
EIR	environmental impact report
ERO	Environmental Review Officer
HABS	Historic American Building Survey
LSM	Less-Than-Significant Impact with Mitigation
LTS	Less-Than-Significant Impact
MLD	Most Likely Descendant
NI	No Impact
NOP	notice of preparation
PPV	peak particle velocity
S	Significant Impact
SU	Significant and Unavoidable Impact, no Feasible Mitigation
SUM	Significant and Unavoidable Impact, after Feasible Mitigation

Chapter S

Summary

This summary chapter provides an overview of the topics and issues addressed in this environmental impact report (EIR), which has been prepared for the proposed 1101–1123 Sutter Street project (proposed project). The San Francisco Planning Department is the lead agency responsible for preparing this EIR in compliance with the California Environmental Quality Act (CEQA).

Following the sections summarizing the proposed project, the project sponsor’s objectives, and the project impacts and mitigation measures, a table presents the environmental impacts of the proposed project, the level of significance of the environmental impacts, and applicable mitigation measures identified to reduce or lessen the significant impacts. Another table presents the mitigation measures from the project’s initial study. This summary chapter also describes the alternatives to the proposed project that are addressed in this EIR and provides a table that compares the characteristics and environmental impacts of the alternatives to those of the proposed project, as well as other project alternatives. This summary chapter concludes with a summary of environmental issues to be resolved and areas of known controversy.

S.1 Project Synopsis

The project sponsor, 1101 Sutter Affordable, LP, proposes the redevelopment of 1101 and 1123 Sutter Street in San Francisco’s Downtown/Civic Center neighborhood. The project site is 0.68 acres (29,700 square feet) and includes two parcels, Assessor’s Parcel Numbers 0692-001 and 0692-019. The project site is composed of the eastern half of the block bounded by Larkin and Polk streets on the east and west, respectively, and Sutter and Hemlock streets on the north and south, respectively.

The proposed project would rehabilitate the existing three-story building at 1101 Sutter Street and demolish the existing building and surface parking lot at 1123 Sutter Street and construct a new 14-story, 150-foot-tall building (up to 161 feet to top of rooftop mechanical equipment). Together, the two buildings would provide 237,808 gross square feet of uses: 221 residential units (44 of which would be provided as very-low-income housing units); 8,330 square feet of commercial and childcare uses; 11,637 square feet of open space; 59 vehicle parking spaces; and 164 bicycle spaces.¹ Although the buildings would be separate structures, the design of the proposed project would create a single, cohesive development.

Chapter 2, Project Description, of this EIR provides a detailed description of the proposed project.

¹ The project as proposed includes a 50 percent increase in density as it meets the requirements of the state density bonus law based on the number of affordable units and level of affordability and would seek concessions and waivers, consistent with the law.

S.2 Project Sponsor's Objectives

The project sponsor and developer is 1101 Sutter Affordable, LP. The project sponsor's objectives for the proposed project are to:

- Develop a well-designed, financially feasible mixed-use project with residential housing units that contributes the following services to support the well-being of the community: new retail, restaurant, and commercial spaces for the benefit of neighborhood residents and businesses; and a childcare center for the benefit of both the project's and neighborhood's residents.
- Increase the supply of housing in the City and County of San Francisco, including affordable housing, in an area designated for higher density due to its proximity to downtown and accessibility to local and regional transit. Maximize housing on a site that currently has no housing and incorporate on-site affordable units.
- Create a more attractive, interesting, and engaging street-level experience for pedestrians, transit users, and future residents.
- Construct a single, cohesive development occupying the project site consisting of high-quality, contemporary urban design.
- Retain historic resources where it is economically and structurally feasible to rehabilitate the building's interior space for new commercial and residential uses.

S.3 Summary of Impacts and Mitigation Measures

The planning department published a notice of preparation of an EIR on December 17, 2020, announcing its intent to prepare and distribute an EIR.

The planning department determined that the proposed project would result in significant impacts on historic architectural resources. Therefore, this EIR is prepared to address these impacts.

The initial study checklist prepared by the planning department for the proposed project found that environmental impacts in the following areas would be less than significant or less than significant with implementation of the mitigation measures: land use and land use planning, population and housing, cultural resources (archeological resources only), 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. Therefore, these areas are not further evaluated in this EIR.

Table S-1, Summary of Impacts and Mitigation Measures Identified in the EIR, p. S-7, summarizes all impacts identified for the proposed project and lists their level of significance as either:

- **No Impact (NI).** No adverse changes (or impacts) to the environment expected
- **Less-Than-Significant Impact (LTS).** 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 (LSM).** Impact that is reduced to a less-than-significant level through implementation of the identified mitigation measure(s)

S.3. Summary of Impacts and Mitigation Measures

- **Significant Impact (S).** A substantial, or potentially substantial, adverse change or impact that meets the significance criteria, before mitigation
- **Significant and Unavoidable Impact, no Feasible Mitigation (SU).** 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
- **Significant and Unavoidable Impact, after Feasible Mitigation (SUM).** Impact that exceeds the defined significance criteria and can be reduced through compliance with existing local, state, and federal laws and regulations and/or implementation of all feasible mitigation measures, but cannot be reduced to a less-than-significant level

For any impacts found to be significant, corresponding mitigation measures are included and the level of significance after mitigation is indicated. As noted in Table S-1, the EIR identified project mitigation measures that would reduce, but not avoid, significant impacts on historic architectural resources.

The initial study identified mitigation measures that would avoid significant adverse impacts related to cultural resources (archeology and human remains), tribal cultural resources, air quality (construction-related impacts), and biological resources. Those mitigation measures are summarized in Table S-2, Mitigation Measures in the Initial Study, p. S-9, and these topics are not further addressed in this EIR.

Table S-1 Summary of Impacts and Mitigation Measures Identified in the EIR

Environmental Impacts	Significance Prior to Mitigation	Mitigation Measures	Significance after Mitigation
HISTORIC ARCHITECTURAL RESOURCES			
Impact CR-1: The proposed rehabilitation of the existing 1101 Sutter Street building would not cause a substantial adverse change to an individual historic architectural resource.	LTS	None required.	LTS
Impact CR-2: The proposed demolition of the existing 1123 Sutter Street building would have a substantial adverse effect on an individual historic architectural resource.	S	<p>Mitigation Measure M-CR-2a: Historical Documentation</p> <p>Prior to the issuance of demolition permits, the project sponsor shall undertake Historic American Building Survey (HABS)-level documentation of the subject property, structures, objects, materials, and landscaping. The documentation shall be funded by the project sponsor and 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 professional overseeing the documentation shall meet with San Francisco Planning Department staff for review and approval of a coordinated documentation plan before work on any one aspect may commence. The documentation shall consist of the following:</p> <ul style="list-style-type: none"> • Measured Drawings: A set of measured drawings that depict the existing size, scale, and dimension of the subject property. 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. • HABS-Level Photography: Digital photographs of the interior and the exterior of the subject property. 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 current National Park Service standards. The photography shall be undertaken by a qualified professional with demonstrated experience in HABS photography. • HABS Historical Report: A written historical narrative and report, per the HABS Historical Report Guidelines. 	SUM

Environmental Impacts	Significance Prior to Mitigation	Mitigation Measures	Significance after Mitigation
		<ul style="list-style-type: none"> Video Recordation of the Historic Resource: Digital video recordation shall be undertaken prior to the issuance of demolition or site permits. The project sponsor shall undertake video documentation of the affected historic resource and its setting. The video recordation will be scoped with and approved by planning department preservation staff prior to issuance of a site permit. The documentation shall be conducted and narrated by a qualified professional who meets the standards for history, architectural history, or architecture (as appropriate) set forth by the Secretary's 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 historic resource. The professional(s) shall prepare the documentation and the planning department shall monitor its preparation. The professional(s) shall submit the completed documentation for review and approval by the planning department preservation staff before issuance of building permits. The final approved documentation shall be provided to the planning department and offered to repositories including, but not limited to: the San Francisco Public Library; the Environmental Design Library at the University of California, Berkeley; the California Historical Resources Information System Northwest Information Center; San Francisco Architectural Heritage; and the California Historical Society. Further, a softcover book shall be produced that includes the content from the historical report, historical photographs, HABS photography, and measured drawings. The book shall be made available to the public for distribution. <p>Mitigation Measure M-CR-2b: Interpretation</p> <p>The project sponsor shall facilitate the development of an interpretive program focused on the history of the project site. The interpretive program should be developed and implemented by a qualified professional with demonstrated experience in displaying information and graphics to the public in a visually interesting manner, such as a museum or exhibit curator. As feasible, coordination with local artists should occur. The primary goal of the program is to educate visitors and future residents about the property's historical themes, associations, and lost contributing features within broader historical, social, and physical landscape contexts. These themes would include but not be limited to the subject property's historic significance as Halsted & Co.</p> <p>An outline for the interpretative program shall be prepared for review and approval by planning department staff. The outline will lay out the various components of the interpretive program that shall be developed in consultation with an</p>	

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S.3. Summary of Impacts and Mitigation Measures

Environmental Impacts	Significance Prior to Mitigation	Mitigation Measures	Significance after Mitigation
		<p>architectural historian who meets the Secretary of the Interior's Professional Qualification Standards, and approved by planning department staff prior to issuance of a site permit or demolition permit.</p> <p>The interpretative program may include but not be limited to the installation of permanent on-site interpretive displays or development of digital/virtual interpretive products. All interpretative material shall be publicly available. For physical interpretation the plan shall include the proposed format and accessible location of the interpretive content, as well as high-quality graphics and written narratives. The interpretative plan should also explore contributing to digital platforms that are publicly accessible, such as the History Pin website or phone applications. Interpretive material could include elements such as virtual museums and content, such as oral history, brochures, and websites.</p> <p>The detailed content, media and other characteristics of such interpretive program shall be approved by Planning Department Preservation staff prior to issuance of a Temporary Certificate of Occupancy.</p> <p>Mitigation Measure M-CR-2c: Historical Architectural Salvage</p> <p>Prior to the issuance of demolition permits that would remove character-defining features as part of construction of the proposed project, 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. The project sponsor shall prepare a salvage plan for review and approval by planning department staff prior to issuance of any site demolition permit.</p>	
Impact CR-3: The construction of the proposed new building on the project site would not have a substantial adverse effect on individual off-site historical resources or historic districts.	LTS	None required.	LTS
Impact C-CR-1: The proposed project, in combination with other past, present, and reasonably foreseeable	LTS	None required.	LTS

S.3. Summary of Impacts and Mitigation Measures

Environmental Impacts	Significance Prior to Mitigation	Mitigation Measures	Significance after Mitigation
future projects in the project vicinity, would not result in a significant cumulative impact on a historic architectural resource.			

NOTES:

LTS = less-than-significant impact, no mitigation required

S = significant impact

SUM = significant and unavoidable impact, with implementation of feasible mitigation

Table S-2 Mitigation Measures in the Initial Study

Environmental Topic	Mitigation Measures
Cultural Resources	<p>M-CR-2: Accidental Discovery</p> <p>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.</p> <p>The project sponsor shall distribute the planning department archeological resource “ALERT” sheet to the project prime contractor, and 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. 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.</p> <p>A preconstruction training shall be provided to all construction personnel performing or managing soil disturbing activities prior to the start of soils disturbing activities on the project. The training may be provided in person by a qualified archeologist or using a video and include a handout prepared by a qualified archeologist. The video and materials shall be provided by or 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>

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Environmental Topic	Mitigation Measures
	<p>The project sponsor shall provide the 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 taken the preconstruction training. 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 Qualified Archaeological Consultants List maintained by the planning department archeologist. The archeological 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 resource is a tribal cultural resource and will consult with affiliated Native Americans tribal representatives, if warranted.</p> <p>Measures might include preservation in situ of the archeological resource, an archeological monitoring program, an archeological testing program, or an archeological interpretation program. If an archeological interpretive, monitoring, and/or testing program is required, it shall be consistent with the Environmental Planning Division guidelines for such programs. The ERO may also require that the project sponsor immediately implement a site security program if the archeological resource is at risk from vandalism, looting, or other damaging actions.</p> <p>If human remains and associated or unassociated funerary objects are discovered during any soils disturbing activity, all applicable state and federal laws shall be followed, including immediate notification of the San Francisco Office of the Chief Medical Examiner, and in the event of the Medical Examiner's determination that the human remains are Native American remains, notification to the California State Native American Heritage Commission is required, who shall appoint a Most Likely Descendant (MLD) (California Public Resources Code, section 5097.98).</p> <p>The ERO shall also be immediately notified upon discovery of human remains. The archeological consultant, project sponsor, ERO, and MLD shall have up to but not beyond six days after the discovery to make all reasonable efforts to develop an agreement for the treatment of human remains and associated or unassociated funerary objects with appropriate dignity (CEQA Guidelines section 15064.5[d]). The agreement should take into consideration the appropriate excavation, removal, recordation, analysis, curation, possession, and final disposition of the human remains and associated or unassociated funerary objects. Nothing in existing state regulations or in this mitigation measure compels the project sponsor and the ERO to accept recommendations of an MLD. The archeological consultant shall retain possession of any Native American human remains and associated or unassociated burial objects until completion of any scientific analyses of the human remains or objects as specified in the treatment agreement if such an agreement has been made or, otherwise, as determined by the</p>

Environmental Topic	Mitigation Measures
	<p>archeological consultant and the ERO. If no agreement is reached state regulations shall be followed including the reinternment of the human remains and associated burial objects with appropriate dignity on the property in a location not subject to further subsurface disturbance (California Public Resources Code, section 5097.98).</p> <p>All plans and reports prepared by the consultant as specified herein shall be submitted first and directly to the ERO for review and comment, and shall be considered draft reports subject to revision until final approval by the ERO.</p> <p>The archeological consultant shall submit an Archeological Resources Report (ARR) to the ERO. The ARR shall evaluate the historical significance of any discovered archeological resource and describing the archeological and historical research methods employed in the archeological monitoring/data recovery program(s) undertaken. It shall include a curation and deaccession plan for all recovered cultural materials. Formal site recordation forms (CA DPR 523 series) shall be attached to the ARR as an appendix.</p> <p>The project archeological consultant shall also submit an Archeological Public Interpretation Plan if a significant archeological resource is discovered during a project. The Archeological Public Interpretation Plan shall describe the interpretive product(s), locations or distribution of interpretive materials or displays, the proposed content and materials, the producers or artists of the displays or installation, and a long-term maintenance program.</p> <p>Once approved by the ERO, copies of the ARR shall be distributed as follows: California Archeological Site Survey Northwest Information Center shall receive one copy, and the ERO shall receive a copy of the transmittal of the ARR to the Northwest Information Center. The Environmental Planning Division of the planning department shall receive one bound copy and one unlocked searchable PDF copy on of the ARR along with geographic information system shapefiles of the site and feature locations and 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. Digital files should be submitted via USB or other stable storage device. In instances of high public interest or interpretive value, the ERO may require a different final report content, format, and distribution than that presented above.</p> <p>M-TCR-1: Tribal Cultural Resources 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 would be both feasible and effective, then the archeological consultant shall prepare an Archeological Resource Preservation Plan, which shall be implemented by the project sponsor during construction. The consultant shall submit a draft Archeological Resource Preservation Plan to the planning department for review and approval.</p> <p>If the ERO, in consultation with the affiliated Native American tribal representatives and the project sponsor, determines that preservation in place of the tribal cultural resources is not a sufficient or feasible option, the project sponsor shall implement an interpretive program for the tribal cultural resource in consultation with affiliated tribal representatives. A Tribal Cultural Resources Interpretation Plan produced in consultation with the ERO and affiliated tribal representatives, at a minimum, and approved by the ERO would be required to guide the interpretive program. The plan shall identify, as appropriate, proposed</p>

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S.3. Summary of Impacts and Mitigation Measures

Environmental Topic	Mitigation Measures						
	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.						
Air Quality	<p>M-AQ-2: Clean Off-Road Construction Equipment</p> <p>The project sponsor shall comply with the following:</p> <p>A. Engine Requirements</p> <ol style="list-style-type: none">1. 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 4 Interim or Tier 4 Final off-road emission standards.2. Where access to alternative sources of power are available, portable diesel engines (e.g., generators) shall be prohibited.3. 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 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.4. The project sponsor 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>B. Waivers</p> <ol style="list-style-type: none">1. The planning department’s environmental review officer or designee (ERO) 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 contractor must submit documentation that the equipment used for on-site power generation meets the requirements of subsection (A)(1).2. The ERO may waive the equipment requirements of Subsection (A)(1) if a particular piece of Tier 4 off-road equipment is technically not feasible, the equipment would not produce desired emissions reduction due to expected operating modes, or there is a compelling emergency need to use off-road equipment that is not Tier 4 compliant. If the ERO grants the waiver, the contractor must use the next cleanest piece of off-road equipment, according to the following table, or another alternative that results in comparable reductions of diesel particulate matter. <table><tr><th colspan="3">Off-Road Equipment Compliance Step-down Schedule</th></tr><tr><th>COMPLIANCE ALTERNATIVE</th><th>ENGINE EMISSION STANDARD</th><th>EMISSIONS CONTROL</th></tr></table>	Off-Road Equipment Compliance Step-down Schedule			COMPLIANCE ALTERNATIVE	ENGINE EMISSION STANDARD	EMISSIONS CONTROL
Off-Road Equipment Compliance Step-down Schedule							
COMPLIANCE ALTERNATIVE	ENGINE EMISSION STANDARD	EMISSIONS CONTROL					

Environmental Topic	Mitigation Measures			
		1	Tier 2	ARB Level 3 VDECS
		2	Tier 2	ARB Level 2 VDECS
		3	Tier 2	ARB Level 1 VDECS
		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 contractor cannot supply off-road equipment meeting Compliance Alternative 1, then the contractor must meet Compliance Alternative 2. If the ERO determines that the contractor cannot supply off-road equipment meeting Compliance Alternative 2, then the contractor must meet Compliance Alternative 3.		
	C. Construction Emissions Minimization Plan			
	Before starting on-site construction activities, the contractor shall submit a construction emissions minimization plan (plan) to the ERO for review and approval. The plan shall state, in reasonable detail, how the contractor will meet the requirements of section A.			
	<div>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 (as reasonably available at the time of plan submission), 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.</div>			
	<div>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 project sponsor agrees to comply fully with the plan.</div>			
	<div>3. The project sponsor shall make the plan available to the public for review on site during working hours. The project sponsor 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 project sponsor 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.</div>			
	D. Monitoring			
	After start of construction activities, the contractor shall submit reports every six months to the ERO documenting compliance with the plan. After completion of construction activities and prior to receiving a final certificate of			

Environmental Topic	Mitigation Measures
	<p>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>
Biological Resources	<p>M-BI-1: Preconstruction Nesting Bird Surveys and Buffer Areas</p> <p>Nesting birds and their nests shall be protected during construction by implementation of the following measure:</p> <ul style="list-style-type: none"> a) To the extent feasible, the project sponsor shall conduct initial activities including, but not limited to, vegetation removal, tree trimming or removal, ground disturbance, building demolition, site grading, and other construction activities that may compromise breeding birds or the success of their nests outside of the nesting season (January 15 through August 31). b) If construction during the bird nesting season cannot be fully avoided, a qualified wildlife biologist shall conduct pre-construction nesting surveys within 7 days prior to the start of construction or demolition at areas that have not been previously disturbed by project activities or after any construction breaks of 7 days or more. Typical experience requirements for a “qualified biologist” include a minimum of four years of academic training and professional experience in biological sciences and related resource management activities and a minimum of two years of experience in biological monitoring or surveying for nesting birds. Surveys of suitable habitat shall be performed in publicly accessible areas within 100 feet of the project site in order to locate any active nests of common bird species and within 200 feet of the project site to locate any active raptor (birds of prey) nests. c) If active nests are located during the preconstruction nesting bird surveys a qualified biologist shall evaluate if the schedule of construction activities could affect the active nests; if so, the following measures shall apply, as determined by the biologist: <ul style="list-style-type: none"> i. If construction is not likely to affect the active nest or nesting behavior, construction may proceed without restriction; however, a qualified biologist shall regularly monitor the nest at a frequency determined appropriate for the surrounding construction activity to confirm there is no adverse effect. Spot-check monitoring frequency would be determined on a nest-by-nest basis considering the particular construction activity, duration, proximity to the nest, and physical barriers that may screen activity from the nest. The qualified biologist may revise their determination at any time during the nesting season in coordination with the planning department. ii. If it is determined that construction may affect the active nest, the qualified biologist shall establish a no-disturbance buffer around the nest and all project work shall halt within the buffer until a qualified biologist determines the nest is no longer in use. These buffer distances shall be equivalent to the survey distances (100 feet for passerines and 200 feet for raptors); however, the buffers may be adjusted if an obstruction, such as a building, is within line of sight between the nest and construction and the biologist determines the construction activity, including noise, is not affecting nesting behaviors. iii. Modifying nest buffer distances, allowing certain construction activities within the buffer, and/or modifying construction methods in proximity to active nests shall be done at the discretion of the qualified biologist and in

S.3. Summary of Impacts and Mitigation Measures

Environmental Topic	Mitigation Measures
	<p>coordination with the planning department, who would notify the California Department of Fish and Wildlife (CDFW). Necessary actions to remove or relocate an active nest shall be coordinated with the planning department and approved by CDFW.</p> <ul style="list-style-type: none"> iv. Any work that must occur within established no-disturbance buffers around active nests shall be monitored by a qualified biologist. If adverse effects in response to project work within the buffer are observed and could compromise the nest, work within the no-disturbance buffer(s) shall halt until the nest is vacated, young have fledged, and there is no evidence of a second attempt at nesting. v. Any birds that begin nesting within the project area and survey buffers amid construction activities are assumed to be habituated to construction-related or similar noise and disturbance levels, so exclusion zones around nests may be reduced or eliminated in these cases as determined by the qualified biologist in coordination with the planning department, who would notify CDFW. Work may proceed around these active nests as long as the nests and their occupants are not directly affected. <p>d) In the event inactive nests are observed within or adjacent to the project site at any time throughout the year, any removal or relocation of the inactive nests shall be at the discretion of the qualified biologist in coordination with the planning department, who would notify and seek approval from the CDFW, as appropriate. Work may proceed around these inactive nests.</p>

S.4 Summary of Project Alternatives

The four alternatives analyzed in chapter 5 of this EIR are the No Project Alternative, Full Preservation Alternative, Partial Preservation Alternative 1, and Partial Preservation Alternative 2, as shown in Table S-3, Comparison of Alternatives for CEQA Analysis, p. S-18. These alternatives represent a reasonable range of alternatives to the proposed project that would feasibly attain project objectives and would avoid or substantially lessen the significant adverse environmental impact to historic architectural resources. The selected alternatives were based on the Secretary of the Interior Standards and applicable land use regulations pertaining to the site. These alternatives are:

- **No Project Alternative.** Under this alternative, no changes would be made to the existing structures at 1101–1123 Sutter Street. The buildings on the site would continue with automotive repair/parking uses at 1101 Sutter Street and mortuary uses at 1123 Sutter Street, as described in Chapter 2, Project Description.
- **Full Preservation Alternative.** Under the Full Preservation Alternative, 1101 Sutter Street would be retained and rehabilitated, similar to the proposed project; 1123 Sutter Street would be retained, a two-level addition would be constructed above the existing building, and the interior would be redeveloped; and an 18-story, 200-foot tall residential tower would be constructed on the parking lot at the west side of the project site (on the existing surface parking lot). The overall size of the alternative would be smaller than the proposed project, with 115 dwelling units (approximately 110,736 gross square feet of residential uses), less amenity and open space, and the same amount of commercial, childcare, and garage uses as the proposed project.
- **Partial Preservation Alternative 1.** Under the Partial Preservation Alternative 1, both 1101 Sutter Street and 1123 Sutter Street would be retained, with a four-story addition above each building, and an 18-story, 200-foot-tall residential tower would be constructed on the parking lot at the west side of the project site (on the existing surface parking lot). The overall size of this alternative would be smaller than the proposed project, but larger than the Full Preservation Alternative, with 151 dwelling units (approximately 133,227 gross square feet of residential uses), less amenity and open space, and the same amount of commercial, childcare, and garage uses as the proposed project.
- **Partial Preservation Alternative 2.** Under the Partial Preservation Alternative 2, there would be no change to 1101 Sutter Street. There would be a 12-level addition to the existing building on 1123 Sutter Street and a new, stand alone 14-story building with a height of 150 feet. Overall this alternative would construct 182 dwelling units for a total of 168,153 residential square feet and would add a total of 26 new stories. There would be less amenity space and less open space, but the same amount of commercial, office, childcare, and garage space. Approximately 46,714 square feet within the two historic buildings would be retained for adaptive reuse. The overall size of this alternative would be smaller than the proposed project but larger than the Full Preservation Alternative and Partial Preservation Alternative 1.

Table S-3 compares the development program and impacts identified for the proposed project and the project alternatives. Table S-4 compares the alternatives ability to meet the project objectives. Table S-5 shows which character-defining features of 1101 and 1123 Sutter Street would be retained under each project alternative. Table S-6 compares the impacts for each alternative and the proposed project related to historic architectural resources and wind.

Table S-3 Comparison of Alternatives for CEQA Analysis

	Proposed Project	No Project Alternative (Existing Conditions)	Full Preservation Alternative	Partial Preservation Alternative 1	Partial Preservation Alternative 2
DESCRIPTION					
BUILDING HEIGHT/STORIES					
1101 Sutter Street	No change from existing	45 feet ^a Three stories plus partially below-grade garage	Same as project	85 feet 7 stories (existing building plus 4 additional levels, set back 20 feet along Sutter and Larkin streets)	Same as project
1123 Sutter Street, east side of parcel	150 feet ^a 14 stories	25 feet ^a 1 story with partial mezzanine plus partially below-grade garage	45 feet 3 stories (existing building plus 2-level addition, set back 25 feet along Sutter and Hemlock streets)	65 feet 5 stories (existing building plus 4-level addition, set back 25 feet along Sutter Street)	150 feet 14 stories (existing building plus 12 level addition, no setback)
1123 Sutter Street, west side of parcel		0 feet (surface parking lot)	200 feet/ 18 stories	200 feet/ 18 stories	150 feet/ 14 stories
RESIDENTIAL UNITS					
Number of Units	221	0	115	151	214
GROSS SQUARE FEET BY USE					
Residential	177,306	0	110,736	133,227	168,153
Common Amenities for Residents	12,201	0	3,378	3,378	3,378
Commercial	4,575	51,596	Same as project	Same as project	Same as project
Childcare	3,755	0	Same as project	Same as project	Same as project
Open Space	11,637	0	1,607	2,903	1,607
Garage/Vehicular and Bicycle Parking	15,125	Included in commercial	Same as project	Same as project	Same as project

SOURCE: David Baker Associates 2021.

NOTE:

^a Height above Sutter Street grade

Table S-4 Comparison of Alternatives Retention of Character-Defining Features

Character-Defining Feature	Full Preservation Alternative			Partial Preservation Alternative 1			Partial Preservation Alternative 2		
	R ^a	PR ^b	NR ^c	R	PR	NR	R	PR	NR
1101 Sutter Street:									
Three-story height and massing	X				X		X		
Concrete and brick masonry construction	X			X			X		
Stucco finish scored to resemble stone masonry	X			X			X		
Molded cement plaster ornament, with spandrel panels & urns	X			X			X		
Sheet metal cornice	X			X			X		
Grid-like fenestration pattern	X			X			X		
Divided-lite “industrial” wood sash windows	X			X			X		
1123 Sutter Street:									
One-story-with-mezzanine height		X			X				X
Simple rectangular form and massing		X			X				X
Primary façade element: seven bay symmetrical arrangement; two side entrances and one center entrance separated by two fenestration bays	X			X			X		
Primary façade element: recessed fenestration and entryways	X			X			X		
Primary façade element: custom, cast iron street light fixtures at each entrance along Sutter Street	X			X			X		
Primary façade element: pairs of wood casement windows and planter boxes	X			X			X		
Classical Revival style element: eight pairs of Doric columns	X			X			X		
Classical Revival style element: Plaster ornament in swag motif and circular medallions with geometric Greek key molding	X			X			X		
Metal clathri screens	X			X			X		
First floor interior element: reception area including rotunda and main corridor		X			X			X	
First floor interior element: west and east chapels			X			X			X
First floor interior element: three suites of interconnected bereavement rooms		X			X			X	

SOURCE: ARG 2021.

NOTES:

^a Retained

^b Partially Retained

c Not Retained

Table S-5 Comparison of Alternatives Ability to Meet Project Sponsor's Objectives

Objective/Alternative	Proposed Project	No Project	Full Preservation	Partial Preservation Alternative 1	Partial Preservation Alternative 2
Develop a well-designed, financially feasible mixed-use project with residential housing units that contributes the following services to support the well-being of the community: new retail, restaurant, and commercial spaces for the benefit of neighborhood residents and businesses; and a child care center for the benefit of both the project's and neighborhood's residents.	Meets	Does not meet	Partially meets. Would contribute services to the well-being of the community. However, there would be a 48% reduction in unit count from the proposed project	Partially meets. Would contribute services to the well-being of the community. However, there would be a 32% reduction in unit count from the proposed project	Partially meets. Would contribute services to the well-being of the community. However, there would be a 3% reduction in unit count from the proposed project
Increase the city's supply of housing, including affordable housing, in an area designated for higher density due to its proximity to downtown and accessibility to local and regional transit. Maximize housing on a site that currently has no housing and incorporate on-site affordable units.	Meets	Does not meet	Partially meets – 106 fewer units than proposed project	Partially meets - 70 fewer units than proposed project	Partially meets - 7 fewer units than proposed project
Create a more attractive, interesting and engaging street-level experience for pedestrians, transit users, and future residents.	Meets	Does not meet	Meets	Meets	Meets
Construct a single, cohesive development occupying the project site consisting of high-quality, contemporary urban design.	Meets	Does not meet	Meets	Meets	Meets

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Objective/Alternative	Proposed Project	No Project	Full Preservation	Partial Preservation Alternative 1	Partial Preservation Alternative 2
Retain historic resources where it is economically and structurally feasible to rehabilitate the building's interior space for new commercial and residential uses.	Partially Meets (fully preserves 1101 Sutter and demolishes 1123 Sutter)	Does not meet	Meets (fully preserves 1101 Sutter and retains the majority of character-defining features and some interior spaces at 1123 Sutter)	Partially meets (retains façade-related character-defining features at both 1101 and 1123 Sutter and some interior spaces at 1123 Sutter, but 4-story additions at both buildings only partially retain height- and massing-related character-defining features)	Partially meets (fully preserves 1101 Sutter and retains façade-related character-defining features and some interior spaces at 1123 Sutter, but 12-story addition on top of 1123 Sutter does not retain height- and massing-related character-defining features)

SOURCE: ARG 2021.

Table S-6 Comparison of Alternatives Historic Architectural Resources and Wind Impacts

Impact	Proposed Project	No Project	Full Preservation	Partial Preservation Alternative 1	Partial Preservation Alternative 2
HISTORIC ARCHITECTURAL RESOURCES					
Impact CR-1: 1101 Sutter Street	LTS	NI	LTS	SUM	LTS
Impact CR-2: 1123 Sutter Street	SUM	NI	LTS	SUM↓ ^a	SUM↓ ^a
Impact CR-3: Offsite Resources	LTS	NI	LTS	LTS	LTS
Impact C-CR-1: Cumulative	LTS	NI	LTS	LTS	LTS
WIND^c					
Impact WI-1: Wind Hazards	LTS	NI	SUM	SUM	LTS↑
Impact C-WI-1: Cumulative	LTS	NI	LTS	LTS	LTS↑

NOTES:

^a Significant and unavoidable impact with implementation of feasible mitigation but with reduced severity than the proposed project (↓)

^b Significant and unavoidable impact with implementation of feasible mitigation with an increase in severity than the proposed project (↑)

^c Evaluated in the initial study (see Appendix A).

LTS = less-than-significant impact, no mitigation required

NI = no impact

SUM = significant and unavoidable impact with implementation of feasible mitigation

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. However, the No Project Alternative would not meet any of the project sponsor's objectives. 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 environmentally superior alternative would be the Full Preservation Alternative. This alternative would reduce Impact CR-2 by proposing only a two-level addition to 1123 Sutter Street which would not substantially impact the historic resource's ability to convey its historic significance. However, this alternative would not avoid a wind hazard impact (Impact WI-1) due to a new 200-foot, 18-story building on the west side of the 1123 Sutter Street parcel.

S.5 Areas of Controversy and Issues to Be Resolved

Publication of the notice of preparation initiated a 30-day public review and comment period that began on December 17, 2020 and ended on January 22, 2021. Individuals and agencies that received these notices included owners of properties within 300 feet of the project site, and potentially interested parties, including regional and state agencies. During the review and comment period, a total of three commenters submitted comments to the planning department. The Native American Heritage Commission commented on Assembly Bill 52 tribal cultural resources notification and consultation requirements. Other commenters on the notice of preparation commented on impacts to the adjacent buildings, including construction noise and debris control; access to sunlight and views; and project merits. The planning department has considered the comments made by the public in preparation of the initial study and the draft EIR for the proposed project. There are no known areas of controversy or issues to be resolved.

Comments expressing support for the proposed project or opposition to it will be considered independently of the environmental review process by city decision makers as part of their decision to approve, modify, or disapprove the proposed project.

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Chapter 1

Introduction

This environmental impact report (EIR) analyzes the potential environmental effects associated with the proposed 1101–1123 Sutter Street project (proposed project). This chapter describes the type, purpose, and function of the EIR and describes the environmental review process for the project.

1.A Project Summary

The proposed project would involve rehabilitation of the existing three-story building at 1101 Sutter Street, along with demolishing the existing building and surface parking lot at 1123 Sutter Street, and constructing a new 14-story, 150-foot-tall building (up to 161 feet as measured to the top of rooftop mechanical equipment).^{1,2} Together, the rehabilitated building at 1101 Sutter Street and the new building at 1123 Sutter street would provide 237,808 gross square feet of uses – 221 residential units (44 of which would be very-low-income housing units); 8,330 square feet of commercial and childcare uses; 11,637 square feet of open space; 59 vehicular parking spaces; and 164 bicycle spaces.

1.B Purpose of This EIR

The San Francisco Planning Department, serving as lead agency responsible for administering the environmental review on behalf of the City and County of San Francisco (the city), determined that the proposed project required the preparation of an EIR.

The California Environmental Quality Act (CEQA) requires that before a decision can be made to approve a project that could pose potential adverse physical effects, an EIR must be prepared that fully describes the environmental effects of the project.³ The information contained in an EIR is reviewed and considered by the decision makers before arriving at a decision to approve, disapprove, or modify a project.

CEQA requires that the lead agency neither approve nor implement a project unless the project's significant environmental effects have been reduced to a less-than-significant level, essentially “eliminating, avoiding, or substantially lessening” the expected impact, except when certain findings are made. If the lead agency approves a project that will result in the occurrence of significant adverse impacts that cannot be mitigated to less-than-significant levels, the agency must state the reasons for its action in writing; demonstrate that its action is based on the EIR or other information in the record; and adopt a statement of overriding considerations.

The planning department has prepared this EIR to provide the public and responsible and trustee agencies reviewing the proposed project with information about the potential effects of the project on the environment. This EIR describes the potential environmental impacts resulting from implementation of the proposed project;

¹ Architectural Resources Group, *1123 Sutter Street Historic Resource Evaluation*, Draft, November 4, 2019.

² San Francisco Planning Department, *Historic Resource Evaluation Response*, Record No. 2019-022850ENV, 1101–1123 Sutter Street.

³ California Public Resources Code, Sections 21000–21189.3, California Environmental Quality Act (CEQA), as amended. The CEQA statutes are available at: https://leginfo.ca.gov/faces/codes_displayexpandedbranch.xhtml?tocCode=PRC&division=13.&title=&part=&chapter.

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1.C. Environmental Review Process

identifies mitigation measures for reducing impacts to a less-than-significant level where feasible; and evaluates alternatives to the project.

This document is a project-level focused EIR and is intended as an informational document that, in and of itself, does not determine whether a project will be approved but aids the planning and decision-making process by disclosing the potential for significant and adverse impacts. In conformance with CEQA, this EIR provides information addressing the environmental consequences of the project and identifies possible means of reducing or avoiding its potentially significant impacts. The CEQA Guidelines define the role and expectations for this EIR as follows:⁴

- **Informational Document.** An EIR is an informational document which will inform public agency decisionmakers and the public generally of the significant environmental effect[s] of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project. The public agency shall consider the information in the EIR along with other information which may be presented to the agency (Section 15121[a]).
- **Standards for Adequacy of an EIR.** An EIR should be prepared with a sufficient degree of analysis to provide decisionmakers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The courts have looked not for perfection but for adequacy, completeness, and a good faith effort at full disclosure (Section 15151).

1.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 initial study for the proposed project. Based on the analysis in the initial study (see Appendix A, Initial Study), the proposed project would result in significant impacts on historic architectural resources.

Therefore, further environmental review of the proposed project is required for the topic of historic architectural resources. This focused EIR has been prepared to examine the proposed project'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 that could substantially reduce or eliminate one or more significant impacts of the proposed project and could still feasibly attain most of the basic project objectives. The other environmental topics are addressed in the initial study, which determined that the

⁴ 14 CCR 15000–15387 and Appendices A–N, Guidelines for Implementation of the California Environmental Quality Act, as amended. The CEQA Guidelines are available at: [https://govt.westlaw.com/calregs/Browse/Home/California/CaliforniaCodeofRegulations?guid=I95DAAA70D48811DEBC02831C6D6C108E&originationContext=documenttoc&transitionType=Default&contextData=\(sc.Default\)](https://govt.westlaw.com/calregs/Browse/Home/California/CaliforniaCodeofRegulations?guid=I95DAAA70D48811DEBC02831C6D6C108E&originationContext=documenttoc&transitionType=Default&contextData=(sc.Default)).

proposed project'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 initial study.

1.C.1 Notice of Preparation of an EIR

1101 Sutter Affordable, LP, filed an environmental evaluation application with the planning department on December 12, 2019. 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 most recent proposed project plans dated June 7, 2021.

In accordance with CEQA Guidelines sections 15063 and 15082, the planning department, as lead agency, published and distributed an NOP (see Appendix B, Notice of Preparation of an EIR); the NOP includes a project description and indicates topics to be addressed in the EIR. The NOP anticipated that the EIR would include a focused assessment of impacts to historic architectural resources, and that the initial study would analyze environmental impacts related to the following topics: land use and land use planning, 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.

Publication of the NOP initiated a 30-day public review and comment period that began on December 17, 2020 and ended on January 22, 2021 (see Appendix B). During the review and comment period, a total of three commenters submitted letters to the planning department. The Native American Heritage Commission commented on Assembly Bill 52 tribal cultural resources notification and consultation requirements. Other commenters on the NOP commented on impacts to the adjacent buildings, including construction noise and debris control, access to sunlight and views, and project merits. The planning department has considered the comments made by the public in preparation of the initial study and draft EIR for the proposed project. There are no known areas of controversy or issues to be resolved.

1.C.2 Draft EIR and 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 Environmental Review Documents web page under the review category Environmental Impact Reports and Negative Declarations.⁵ 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 CPC.1101-1123SutterEIR@sfgov.org or (628) 652-7494 to make a request. Written comments should be addressed to David Young, San Francisco Planning Department, 49 South Van Ness Avenue, Suite 1400, San Francisco, CA 94103, or emailed to CPC.1101-1123SutterEIR@sfgov.org. The public comment period for this draft EIR is from August 18, 2021 to October 5, 2021.

⁵ San Francisco Planning Department, "Environmental Review Documents," web page, available at: <https://sfplanning.org/environmental-review-documents>, accessed February 2021.

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1.C. Environmental Review Process

The San Francisco 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 September 15, 2021 beginning 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.⁶

The planning commission will hold a public hearing on this EIR during the 45-day public review and comment period for the EIR to solicit public comment on the information presented in the draft EIR. The public hearing will be held on September 30, 2021, 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.⁷

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: David Young, Environmental Coordinator
49 South Van Ness Avenue, Suite 1400
San Francisco, CA 94103
CPC.1101-1123SutterEIR@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.

1.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; and (3) reflects the lead agency's independent judgment and analysis.

⁶ San Francisco Planning Department, website: <https://sfplanning.org>.

⁷ San Francisco Planning Department, website: <https://sfplanning.org>.

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.

1.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 as a condition of project approval in order to mitigate or avoid significant impacts on the environment (CEQA section 21081.6 and CEQA Guidelines section 15097).^{8,9} This EIR identifies and presents mitigation measures that would form the basis of such a monitoring and reporting program. Any mitigation and improvement measures adopted by the lead agency as conditions for approval of the project would be included in the monitoring and reporting program.

⁸ California Public Resources Code, Sections 21000–21189.3, California Environmental Quality Act (CEQA), as amended.

⁹ 14 CCR 15000–15387 and Appendices A–N, Guidelines for Implementation of the California Environmental Quality Act, as amended.

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Chapter 2

Project Description

This chapter describes the proposed 1101–1123 Sutter Street project (proposed project) evaluated in this environmental impact report (EIR). Topics addressed in this chapter include an overview of the project; a description of the project location and existing conditions at the site; the project sponsor’s objectives; a description of the project characteristics; and the intended uses of this EIR, including the required approvals.

2.A Project Overview

The project site includes 1101 and 1123 Sutter Street in San Francisco, California, as shown on Figure 2-1, Project Location, p. 2-6. The project site is 0.68 acres (29,700 square feet) and includes two parcels, Assessor’s Parcel Numbers (APNs) 0692-001 and 0692-019, shown on Figure 2-2, Project Site, p. 2-7. The project site is composed of the eastern half of the block bounded by Larkin and Polk streets on the east and west, respectively, and Sutter and Hemlock streets on the north and south, respectively. The project site is located in the Downtown/Civic Center neighborhood. A summary of the project site characteristics is provided in Table 2-1.

Table 2-1 Project Site Characteristics

Lot	Characteristics		
	1101 SUTTER STREET	1123 SUTTER STREET	TOTAL
Assessor’s Parcel Number	0692-001	0692-019	—
Area	9,000 square feet	20,700 square feet	29,700 square feet
Width	75 feet	172.5 feet	247.5 feet
Length	120 feet	120 feet	120 feet ^a

SOURCE: David Baker Architects 2020.

NOTE:

^a Total length is not additive.

The proposed project would involve rehabilitating the existing three-story building at 1101 Sutter Street and demolishing the existing building and surface parking lot at 1123 Sutter Street and constructing a new 14-story, 150-foot-tall building (up to 161 feet to the top of rooftop mechanical equipment). Together, the two buildings would provide 237,808 gross square feet of uses: 221 residential units (44 of which would be provided as very-low-income housing units); 8,330 square feet of commercial and childcare uses; 11,637 square feet of open space; 59 vehicle parking spaces; and 164 bicycle parking spaces.¹

Although the buildings would be separate structures, the design of the proposed project creates a single, cohesive development. The buildings would have shared residential lobbies, as well as shared common open

¹ The project as proposed includes a 50 percent increase in density as it meets the requirements of the state density bonus law based on the number of affordable units and level of affordability and would seek concessions and waivers, consistent with the law.

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spaces and residential amenities. In addition, both parking garages would be accessible to the residents and commercial users of both buildings. Mechanical equipment and service spaces, such as heating, ventilation, and air-conditioning units and the electrical and fire rooms, would be located in 1123 Sutter Street and would serve both buildings. The existing uses and proposed project characteristics are summarized in Table 2-2. Refer to Table 2-3, Project Characteristics, p. 2-13, for a detailed breakdown of the square footage by land use type.

The existing 35,876-square-foot three-story auto-repair and parking garage at 1101 Sutter Street, which has been determined eligible for listing in the National Register of Historic Places, would be rehabilitated for new uses;² it would become a mixed-use residential building with approximately 2,187 square feet of ground-floor commercial uses and 21 residential units on the ground, second, and third floors. The existing partially below-grade garage would provide 28 vehicle parking spaces and 24 bicycle parking spaces.³ The project sponsor is seeking Federal Rehabilitation Tax Credits for 1101 Sutter Street.^{4,5} Tax credits are available for the rehabilitation of buildings that are determined by the Secretary of the Interior, through the National Park Service, to be “certified historic structures” (see Appendix C). The State Historic Preservation Office and the National Park Service review rehabilitation work to ensure that it complies with the Secretary’s Standards for Rehabilitation. The rehabilitation of the existing building at 1101 Sutter Street would be completed in conformance with Secretary of the Interior’s Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring and Reconstructing Historic Buildings.^{6,7}

The existing 15,720-square-foot, one-story plus partial mezzanine mortuary building at 1123 Sutter Street, which is eligible for listing on the California Register of Historical Resources,^{8,9} would be demolished along with its surface parking lot, and an approximately 211,636-square-foot, 150-foot-tall mixed-use residential building with 6,163 square feet of ground-floor commercial and childcare uses and 200 residential units would be constructed. The building would include approximately 31 vehicle parking spaces and a total of 164 bicycle parking spaces. The vehicle parking spaces and 96 Class 1 bicycle parking spaces would be provided in a partially below-grade parking garage.^{10,11} The remaining 44 bicycle parking spaces would be provided within the Sutter Street ground-floor level of the building, accessible from the residential lobby, and 24 Class 2 bicycle parking spaces would be provided along the sidewalk on Hemlock and Sutter streets.

² National Park Service, *Historic Preservation Certification Application, State Historic Preservation Office Review & Recommendation Sheet, Significance – Part 1, Heald’s Engineering and Automobile School, 1101 Sutter Street, San Francisco, CA 94109*. Date application received by State Historic Preservation Office: July 12, 2019. Date of transmittal to National Park Service: August 23, 2019.

³ Due to downhill slope of project site, the garage is located below grade along Sutter Street and at grade along Hemlock Street.

⁴ VerPlanck, C., *National Park Service Historic Preservation Certification Application Part I – Evaluation of Significance*, prepared by VerPlanck Historic Preservation Consulting, San Francisco, CA, 2019. Submitted to the California Office of Historic Preservation.

⁵ VerPlanck, C., *National Park Service Historic Preservation Certification Application Part 2 – Description of Rehabilitation*, prepared by VerPlanck Historic Preservation Consulting, San Francisco, CA, 2019. Submitted to the California Office of Historic Preservation.

⁶ Weeks and Grimmer, *The Secretary of the Interior’s Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring & Reconstructing Historic Buildings*, National Park Service Technical Preservation Services, Washington, DC, 1995 (revised by A. Grimmer 2017).

⁷ National Park Service, *Historic Preservation Certification Application – Part 2, Description of Rehabilitation for Heald’s Engineering and Automobile School, 1101 Sutter Street, San Francisco, CA 94109*. Date application received by State Historic Preservation Office: July 12, 2019. Date of transmittal to National Park Service: August 23, 2019.

David Baker Architects, *Drawings for 1101 Sutter Street Rehabilitation for the State Office of Historic Preservation*, February 5, 2021.

⁸ Architectural Resources Group, *1123 Sutter Street Historic Resource Evaluation*, Draft, November 4, 2019.

⁹ San Francisco Planning Department, *Historic Resource Evaluation Response, Record No. 2019-022850ENV, 1101–1123 Sutter Street*.

¹⁰ The Hemlock Street grade is approximately 10 feet below the Sutter Street grade. Due to downhill slope of project site, the garage is located below grade along Sutter Street and at grade along Hemlock Street.

¹¹ As defined in planning code section 155.1, class 1 spaces are spaces in secure, weather-protected facilities intended for use as long-term, overnight, and work-day bicycle storage by dwelling unit residents, nonresidential occupants, and employees; class 2 spaces are spaces 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.

Table 2-2 Summary of Existing and Proposed Uses

	1101 Sutter Street		1123 Sutter Street			
Component/Use	EXISTING	PROPOSED	EXISTING	PROPOSED	Net Change	Project Total
GENERAL						
Number of Building(s)	1	1	1	1	No change	2
Number of Stories	Three stories plus partially below-grade garage	Same as existing	One story with partial mezzanine plus partially below-grade garage	14 stories plus partially below-grade garage	Increase of 11 stories above the tallest existing building	—
Building Height (feet)	45 feet above Sutter Street grade	Same as existing	25 feet above Sutter Street grade	150 feet above Sutter Street grade plus 11-foot-tall rooftop equipment enclosure	Increase of 105 feet above the tallest existing building	—
Total (gsf)	35,876	26,172	15,720	211,636	202,618	237,808
LAND USE						
Land Uses	Auto-repair and parking garage	Ground-floor commercial with 3-story residential	Mortuary with surface parking lot	Ground-floor commercial with 14-story residential	—	—
Number of Dwelling Units	0	20	0	200	221	221
Residential (gsf)	0	17,927	0	159,379	177,306	177,306
Common Amenities for Residents (gsf)	0	2,386	0	9,815	12,201	12,201
Commercial (gsf)	35,876	2,187	15,720	2,388	-47,021	4,575
Childcare (gsf)	0	0	0	3,755	3,755	3,755
Open Space (gsf/type)	0	0	0	11,637 ^a	11,637	11,637
Garage (gsf)	— ^b	5,135	— ^b	9,990	— ^b	15,125
PARKING						
Vehicle parking spaces	109	28 ^c	35 ^d	31 ^{c, e}	-85	59

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Component/Use	1101 Sutter Street		1123 Sutter Street		Net Change	Project Total
	EXISTING	PROPOSED	EXISTING	PROPOSED		
Bicycle parking spaces	0	24	0	140	164	164

SOURCE: David Baker Architects 2021.

NOTES:

gsf = gross square feet; — = not applicable.

^a The total open space consists of 8,630 square feet of common open space and 3,007 of private open space provided on balconies.

^b Garage space is accounted for in the commercial square footage.

^c Located in a partially below-grade garage.

^d The existing parking at 1101 Sutter consists of 12 spaces in garage and 23 spaces in surface parking lot.

^e A freight loading area for tenants moving in and out, delivery trucks, and other service vehicles would be provided at the Hemlock Street ground-floor level of the 1123 Sutter Street building adjacent to the garage entrance ramp.

2.A.1 Open Space

The proposed project would create approximately 11,637 square feet of private and common open space. All of the open space would be located within the proposed building at 1123 Sutter Street as follows: approximately 3,007 square feet of private open space would be provided in residential balconies and approximately 8,630 square feet of common open space would be provided at the outdoor entry court on Hemlock Street and rooftop decks on levels 7 and 14.¹² Residents of 1101 Sutter Street and commercial tenants of the proposed project would have access to the common open space.

2.A.2 Circulation

The circulation and access of the buildings would be designed such that pedestrian access to ground-floor commercial and childcare uses would primarily occur from Sutter Street. Pedestrian access to the residential units in both buildings would be provided from the main residential lobby on Sutter Street and a second residential entrance on Hemlock Street.

Vehicle access to the garages of both buildings would occur via *curb cuts* along Hemlock Street.¹³ The four existing curb cuts along Hemlock Street would be removed and replaced by a 34-foot-wide curb cut at the garage entrance to 1123 Sutter Street and an 18-foot-wide curb cut at the garage entrance to 1101 Sutter Street.

Pedestrian curb ramps, crosswalks, and signals are provided at the nearest intersection of Larkin Street and Sutter Street to facilitate pedestrian crossing, with the exception of a curb ramp at the southwest corner of the intersection for pedestrians traveling east–west across Larkin Street. The proposed project would add a curb ramp at this location.

2.A.3 Parking and Loading

As discussed above and summarized in Table 2-2, the proposed project would provide a total of 59 vehicle parking spaces in the 1123 and 1101 Sutter Street garages. In addition, the project would include reconfiguring the on-street parking along Sutter, Larkin, and Hemlock streets in the immediate vicinity of the project, resulting in a net removal of six parking spaces and construction of two new white-curb passenger loading zones. The

¹² Open space would not be provided within the 1101 Sutter Street building to rehabilitate it in accordance with the Secretary of the Interior's Standards for the Treatment of Historic Properties.

¹³ A *curb cut* is a solid ramp graded down from the top surface of a sidewalk to the surface of an adjoining street.

project would involve replacement of six existing parking spaces along the south side of Sutter Street with eight parking spaces and two white-curb passenger loading zones; three existing parking spaces along Larkin Street would be replaced with four parking spaces; and nine existing parking spaces on the south side of Hemlock Street across the street from the project would be eliminated to accommodate the new sidewalk on the north side of Hemlock Street.

2.A.4 Sidewalks and Streetscape

Sidewalk improvements and modification of parking and loading areas would occur along the project frontage on Sutter, Larkin, and Hemlock streets. The sidewalk on Hemlock Street would generally be widened from 7 feet to 14 feet to create a planter strip for street trees and to accommodate bicycle parking.

Two existing curb cuts along Sutter Street and two existing curb cuts along Larkin Street would be removed. The existing 12-foot-wide sidewalks along Sutter and Larkin streets would be maintained.

The three existing street trees located along Larkin Street would remain and the existing tree in the surface parking lot at 1123 Sutter Street would be removed. In addition, 15 new street trees would be planted along Sutter, Larkin, and Hemlock streets.



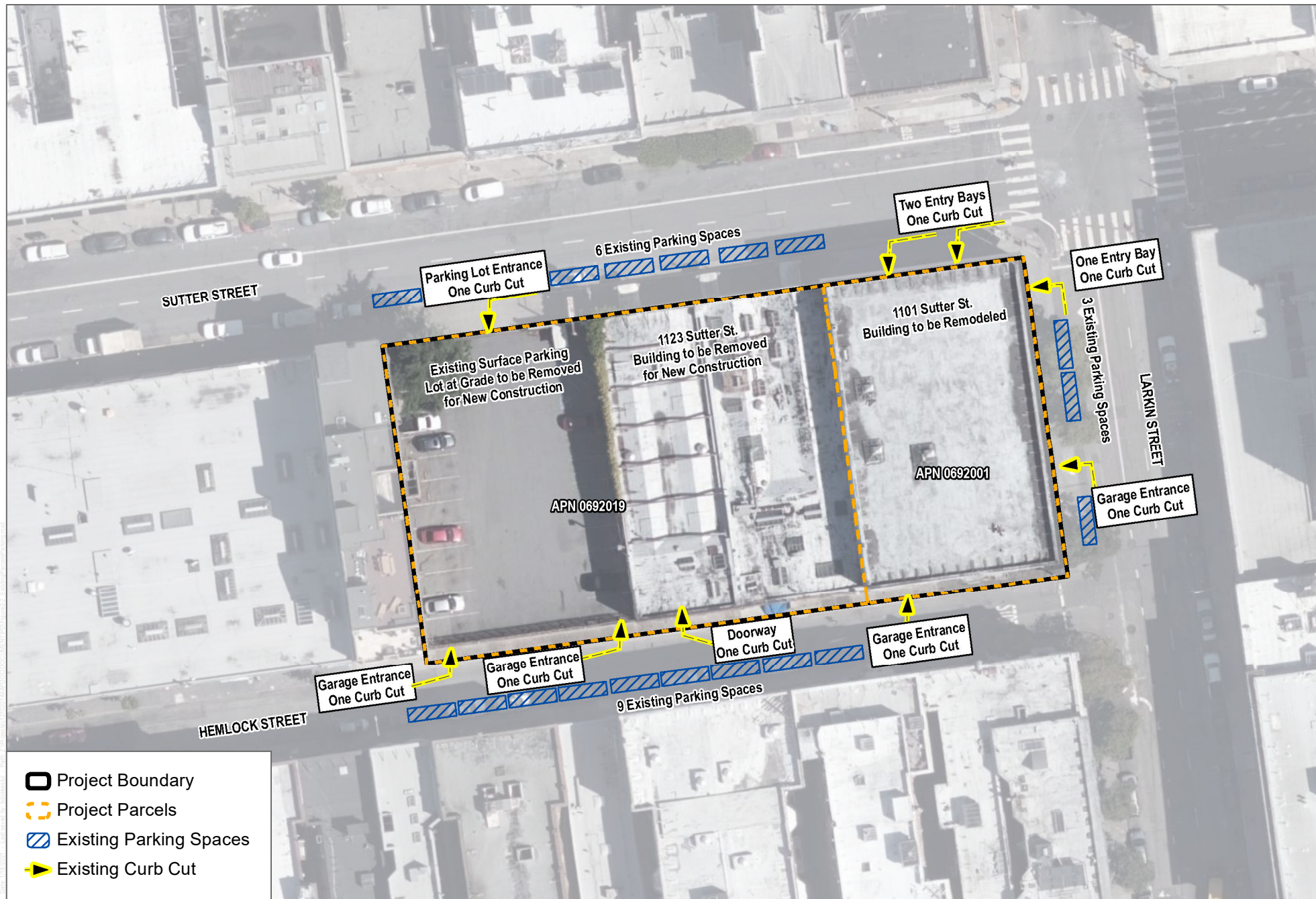
SOURCE: Esri Clarity Basemap 2020, San Francisco County 2020



FIGURE 2-1

Project Location

1101-1123 Sutter Street Project EIR



SOURCE: Esri Clarity Basemap 2020, San Francisco County 2020

FIGURE 2-2

Project Site

1101-1123 Sutter Street Project EIR

2.B Project Location

The project site is composed of the eastern half of the block bounded by Larkin and Polk streets on the east and west, respectively, and Sutter and Hemlock streets on the north and south, respectively, as shown on Figure 2-1, p. 2-6. The approximately 0.68-acre (29,700-square-foot) rectangular site comprises two adjacent lots (APNs 0692-001 and 0692-019). The two existing buildings and a surface parking lot on the site occupy the entire extent of the two lots. The project site slopes downhill from north to south, with an approximately 5 percent grade, from an elevation of approximately 130 feet to 123 feet.

Van Ness Avenue is the primary north–south road in the project vicinity and is 1.5 blocks west of the site. Sutter and Hemlock streets are one-way east–west roads, and Larkin and Polk streets are one-way north–south roads. The closest San Francisco Bay Area Rapid Transit District (BART) stop is at Civic Center, approximately 0.75 miles southeast of the site, and the closest San Francisco Municipal Railway Metro stop is at Polk Street and Sutter Street, about 0.5 blocks west of the site. The nearest bus stop is located on the north side of Sutter Street near the intersection with Larkin Street. The following San Francisco Municipal transit lines operate within a 0.25-mile radius of the project site: 2-Clement, 3-Jackson, 10-Townsend, 19-Polk, 27-Bryant, 38-Geary and 38R-Geary Rapid, 47-Van Ness, 49-Van Ness/Mission, 54-Felton, and 90-San Bruno Owl.

The project site is zoned NCD (Polk Street Neighborhood Commercial District). The maximum allowed floor area ratio for the non-residential uses on the site is 2.5:1, as specified in San Francisco Planning Code section 723.¹⁴ There is no floor area ratio requirement for residential uses within this zoning district.

2.C Project Vicinity and Surrounding Land Uses

The project site is within the Downtown/Civic Center neighborhood located approximately 0.5 miles north of the Civic Center, which includes the city hall and other government buildings, and the performing arts complex, which includes Davies Symphony Hall, the Opera House, and Herbst Theater. The surrounding area consists primarily of three- to six-story brick-and-concrete mixed-use buildings with commercial uses on the ground floor and apartments or residential hotel rooms on the upper floors. A two-story building with a grocery store and restaurants is on the same block, west of the project site, and a two-story community youth center is across Hemlock Street to the south of the project site. Buildings adjacent to and across the street from the project site range from about 20 to 60 feet in height and some buildings on adjacent blocks reach up to about 130 feet in height.

The buildings in the vicinity of the project site were constructed in the early 1900s, with the exception of the immediately adjacent building west of the site (1151 Sutter Street, a nine-unit condominium complex with office space on the ground floor), which was built in 2009.¹⁵ Many of the buildings to the north, east, and south of the project site are contributors to the Lower Nob Hill Apartment Hotel Historic District, which is listed in the National Register. However, the existing buildings on the project site are not contributors to this district, nor are other buildings on the block, west of the project site.¹⁶

¹⁴ As defined in planning code section 102.11, floor area ratio is the ratio of the gross floor area of all the buildings on a lot to the area of the lot. In cases where portions of the gross floor area of a building project horizontally beyond the lot lines, all such projecting gross floor area shall also be included in determining the floor area ratio.

¹⁵ National Park Service, *National Register of Historic Places Registration Form, Lower Nob Hill Apartment Hotel District*, June 24, 1991.

¹⁶ National Park Service, *National Register of Historic Places Registration Form, Lower Nob Hill Apartment Hotel District*, June 24, 1991.

The eastern portion of the site (1101 Sutter Street) is within the 130-E Height and Bulk District, and the western portion of the site (1123 Sutter Street) is located within the 65-A Height and Bulk District. The height and bulk districts surrounding the project site are 130-E, 80-A, and 80-T to the north, east, and south, and 65-A, 130-V, and 130-E to the west. The project site and the properties adjacent to and across the street from the project site are zoned NCD (Polk Street Neighborhood Commercial District). The NCD zoning extends to areas north of the project site, while areas to the east, south, and west are predominantly zoned RC-4 (High-Density Residential Commercial Combined District).

2.D Existing Conditions

Information pertaining to the two existing buildings on the project site is summarized in Table 2-2, p. 2-3, and a detailed description of these buildings, their uses, and surrounding streetscape is provided in this section.

2.D.1 1101 Sutter Street

1101 Sutter Street is a three-story building with a partially below-grade garage located on the smaller of the two parcels (APN 0692-001) that compose the project site, shown on Figure 2-2, p. 2-7. The property slopes downhill to the south, so the garage is at grade along Hemlock Street and below grade along Sutter Street. As illustrated in Photo 1 of Figure 2-3, Photos of Existing Buildings, the frame of the building is reinforced concrete, with brick infill. The surface of the building is clad in stucco that has been lightly scored to resemble masonry. The building was constructed in 1920 as a training school for automobile mechanics and related occupations. Primary vehicle access to the automobile repair portion of the building is from two automobile entry bays along Sutter Street and an entry bay along Larkin Street near the intersection with Sutter Street (shown on Figure 2-2, p. 2-7, and Photo 1 of Figure 2-3, p. 2-10). There is no dedicated pedestrian entrance; pedestrians also enter the building through these entry bays. There are also two garage entrances to the 1101 Sutter Street building, as indicated on Figure 2-2, p. 2-7; one is located along Hemlock Street and one is located along Larkin Street, near the intersection with Hemlock Street. A single curb cut serves the two entry bays along Sutter Street. There is also a curb cut at the entry bay along Larkin Street, a curb cut at the garage entrance along Larkin Street, and a curb cut at the garage entrance along Hemlock Street.

The building was determined eligible for listing in the National Register and the California Register and is considered a historical resource under the California Environmental Quality Act (CEQA).¹⁷ The building is currently used as a parking garage and for automobile repair.

¹⁷ National Park Service, *Historic Preservation Certification Application, State Historic Preservation Office Review & Recommendation Sheet, Significance – Part 1, Heald's Engineering and Automobile School, 1101 Sutter Street, San Francisco, CA 94109*. Date application received by State Historic Preservation Office: July 12, 2019. Date of transmittal to National Park Service: August 23, 2019.



Photo 1: View of 1101 Sutter Street from the intersection Sutter and Larkin streets, northwest of the project site.



Photo 2: View of 1123 Sutter Street from Sutter Street, north of the project site.

SOURCE: Google (Accessed 2020)

FIGURE 2-3

Photos of Existing Buildings

1101-1123 Sutter Street Project EIR

2.D.2 1123 Sutter Street

1123 Sutter Street is a one-story plus partial mezzanine building with a partially below-grade garage/basement located on the second parcel (APN 0692-019), shown on Figure 2-2, p. 2-6, and Photo 2 of Figure 2-3, p. 2-10. The building is currently used as a mortuary. A surface parking lot that serves the building is immediately to the west and is accessed from a curb cut/driveway on Sutter Street. The property slopes downhill to the south, so the garage is at grade along Hemlock Street at the rear of the property and below grade along Sutter Street at the front of the property. The building comprises two older commercial structures, both of which were constructed of brick and concrete with a combination of steel and heavy timber framing. These buildings were combined into one building in 1926 and given a new façade to unify the primary street frontage, shown on Photo 2 of Figure 2-3, p. 2-10; however, the building still visually appears as two buildings on the south façade along Hemlock Street. The building has undergone relatively few alterations since it was completed in 1926 and has been used as a funeral home since that time.

The Hemlock Street ground-floor level of 1123 Sutter Street contains 12 vehicle parking spaces, storage, mechanical rooms, and a casket showroom. The first floor contains a reception area, two chapels, three suites of interconnected bereavement rooms, and several toilet rooms. The mezzanine contains business offices, embalming/preparation rooms, a break room, and restrooms. Pedestrian access to the building occurs through the front entrance along Sutter Street. The building was determined eligible for listing in the California Register and is considered a historical resource under CEQA.¹⁸

2.D.3 Parking

On-street vehicle parking in the project vicinity is provided on Sutter, Larkin, Hemlock, and Polk streets. As shown on Figure 2-2, p. 2-7, there are six existing parking spaces along the south side of Sutter Street, three existing parking spaces along the west side of Larkin Street, and nine existing parking spaces on the south side of Hemlock Street across the street from the project. There are no permanent loading spaces along the project site, but the six parking spaces in front of 1123 Sutter Street are used as a loading zone during funeral services.

Parking is also located onsite at 1101 Sutter Street and 1123 Sutter Street. There are 109 parking spaces within 1101 Sutter Street, 12 within the garage at 1123 Sutter Street, and 23 on the surface parking lot at 1123 Sutter Street.

2.D.4 Street Trees

There are three street trees along the parcel frontage on Larkin Street, and there is one tree located within the surface parking lot at 1123 Sutter Street.

2.E Project Sponsor's Objectives

The project sponsor and developer is 1101 Sutter Affordable, LP. The project sponsor's objectives for the proposed project are to:

- Develop a well-designed, financially feasible mixed-use project with residential housing units that contributes the following services to support the well-being of the community: new retail, restaurant, and

¹⁸ Architectural Resources Group, *1123 Sutter Street Historic Resource Evaluation*, Draft, November 4, 2019.

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commercial spaces for the benefit of neighborhood residents and businesses; and a childcare center for the benefit of both the project's and neighborhood's residents.

- Increase the supply of housing in the City and County of San Francisco, including affordable housing, in an area designated for higher density due to its proximity to downtown and accessibility to local and regional transit. Maximize housing on a site that currently has no housing and incorporate onsite affordable units.
- Create a more attractive, interesting, and engaging street-level experience for pedestrians, transit users, and future residents.
- Construct a single, cohesive development occupying the project site consisting of high-quality, contemporary urban design.
- Retain historic resources where it is economically and structurally feasible to rehabilitate the building's interior space for new commercial and residential uses.

2.F Project Characteristics

The proposed project would involve rehabilitating the existing building at 1101 Sutter Street and demolishing the existing building and surface parking lot at 1123 Sutter Street and constructing a new 14-story, 150-foot-tall building (up to 161 feet to top of rooftop mechanical equipment). Together, the two buildings would provide 237,808 gross square feet of uses: 221 residential units; 8,330 square feet of commercial and childcare uses; 11,637 square feet of open space; 59 vehicle parking spaces; and 164 bicycle parking spaces. Each building is described further in this section.

The proposed project would rehabilitate the existing three-story parking garage at 1101 Sutter Street into a mixed-use residential building with ground-floor commercial and retail space and common amenities for residents. The ground, second, and third floors would contain 21 residential units. The existing partially below-grade garage would be converted to bicycle and vehicle parking.

The existing one-story plus partial mezzanine mortuary at 1123 Sutter Street would be demolished, and a new 14-story, 150-foot-tall building would be constructed (with maximum height up to 161 feet to top of rooftop mechanical equipment enclosure). The Sutter Street ground-floor level would contain commercial and retail space, a childcare center, and common amenities for residents. The proposed building at 1123 Sutter Street would provide the main residential lobby for both buildings and would have an interior connection to the 1101 Sutter Street building. The upper floors would contain 200 residential units, as well as common amenities and open space at the Hemlock Street ground-floor level and on the 7th and 14th levels. This building would also have partially below-grade garage with bicycle and vehicle parking and would include a second residential entrance and a commercial space accessed from Hemlock Street.

The project characteristics are summarized in Table 2-3 and the proposed site plan is shown on Figure 2-4, p. 2-15. Figures 2-5 through 2-8, pp. 2-16 through 2-19, show the proposed floor plans; Figure 2-9, p. 2-20, shows the proposed street parking and loading plan; Figure 2-10, p. 2-21, shows the proposed building cross-sections; and Figures 2-11 and 2-12, pp. 2-22 and 2-23, show visual simulations for the project.

Table 2-3 Project Characteristics

Characteristic	1101 Sutter Street	1123 Sutter Street	Total
LOT	DIMENSIONS		
Assessor's Parcel Number	0692-001	0692-019	—
Size	9,000 square feet	20,700 square feet	29,700 square feet
Width	75 feet	172.5 feet	247.5 feet
Length	120 feet	120 feet	120 feet
PROPOSED USES	AREA (GROSS SQUARE FEET)		
Residential	17,927	159,379	177,306
Common Amenities for Residents ^a	2,386	9,815	12,201
Commercial	2,187	2,388	4,575
Childcare	0	3,755	3,755
Circulation and Service ^b	3,672	36,300	39,972
Garage	5,135	9,990	15,125
Total	31,307	221,627	252,934
Total per Planning Code Section 102.9c	26,172	211,636	237,808
PROPOSED UNITS	AMOUNT (PERCENTAGE)		
Total Dwelling Units	21 (100%)	200 (100%)	221 (100%)
Studio	0 (0%)	82 (41%)	82 (37%)
1-Bedroom	14 (67%)	36 (18%)	50 (23%)
2-Bedroom	7 (33%)	82 (41%)	89 (40%)
Commercial	One space	One space	Two spaces
Childcare	None	One space	One space
Vehicle Parking Spaces	28 ^d	31 ^e	59
Bicycle Parking Spaces	24 ^f	140 ^g	164
OPEN SPACE	AREA (SQUARE FEET)		
Common (Ground Floor and Decks on Levels 7 and 14)	0	8,630 ^h	8,630
Private Balconies	0	3,007 ⁱ	3,007
Total Open Space	0	11,637	11,637
BUILDING CHARACTERISTICS	LEVELS/HEIGHT		
Levels	Three levels (ground floor –commercial and residential; two stories residential)	14 levels (ground floor – main residential lobby/commercial/childcare; 12 stories residential; one-story	—

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Characteristic	1101 Sutter Street	1123 Sutter Street	Total
		deck/common space); roof to contain solar panels and mechanical equipment)	
Height	45 feet above Sutter Street grade (same as existing)	150 feet above Sutter Street grade plus 11-foot-tall enclosure for rooftop mechanical equipment	—
Garage	One level partially below grade ⁱ	One level partially below grade ⁱ (parking garage/ outdoor entry court and second residential entrance/commercial)	—
Loading Areas	None in garage	A freight loading area for residents moving in and out, delivery trucks, and other service vehicles would be provided at the Hemlock Street ground floor level adjacent to the garage entrance ramp	Shared loading zones for project: two on-street white-curb passenger loading zones along Sutter Street and an off-street freight loading area within the 1123 Sutter Street building

SOURCE: David Baker Architects 2021.

NOTES:

— = not applicable.

^a Common amenities include residential lobbies on the Sutter Street and Hemlock Street ground-floor levels, and gym and other common spaces located on levels 7 and 14.

^b Circulation and service uses are those that support the main uses, such as hallways and service spaces for mechanical equipment.

^c Gross floor area per planning code section 102.9 excludes certain areas, such as garage and bicycle parking areas.

^d Vehicle parking spaces: 28 parking spaces would be located in the garage.

^e Vehicle parking spaces: 31 parking spaces would be located in the garage, of which 2 would be accessible to persons with disabilities. An additional two spaces would be car-sharing spaces.

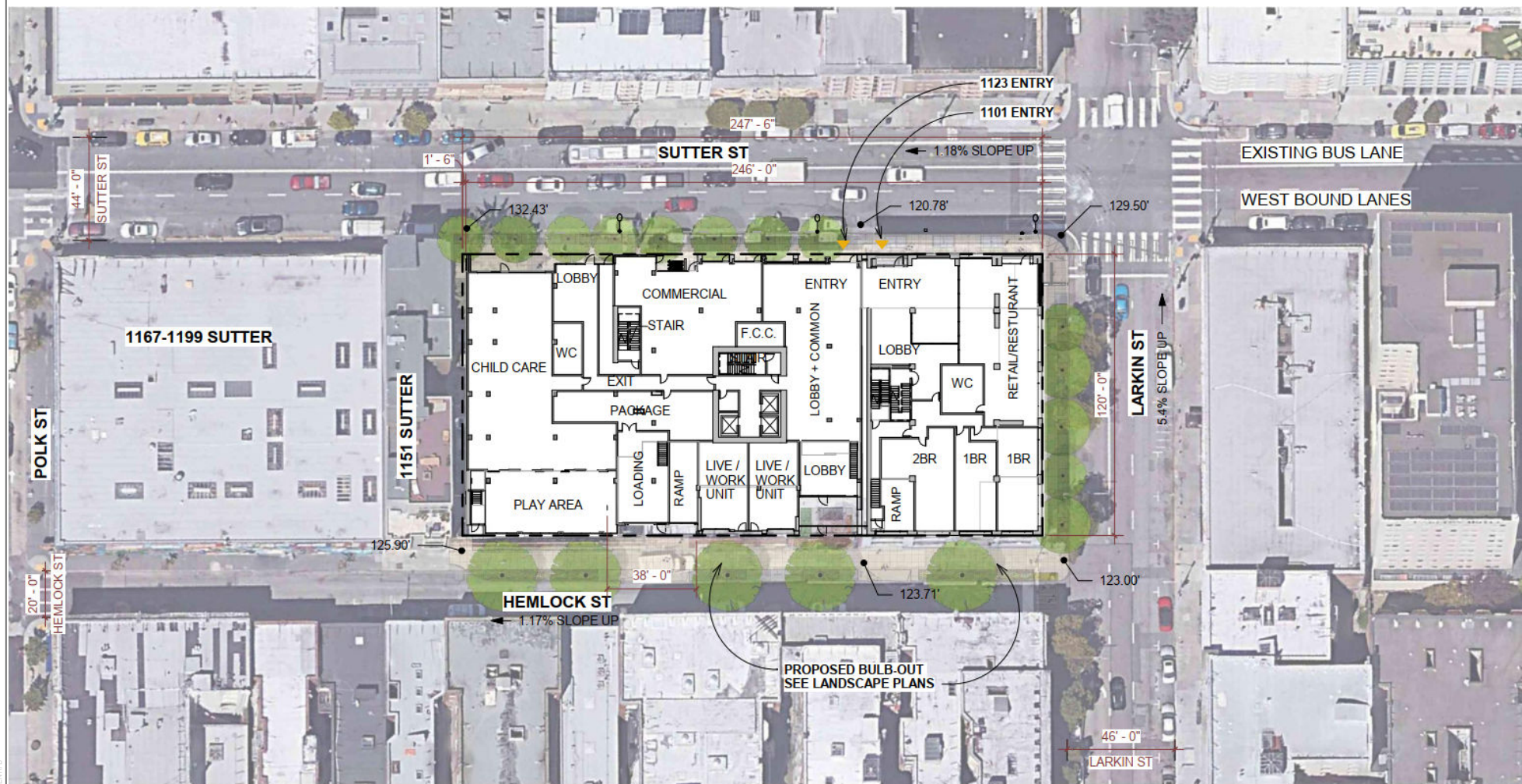
^f Bicycle parking spaces: 24 class 1 bicycle parking spaces would be located in the garage.

^g Bicycle parking spaces: 96 class 1 bicycle parking spaces would be located in the garage, 44 class 1 bicycle parking spaces would be located inside 1123 Sutter Street accessible at the Sutter Street ground-floor level, and 24 class 2 parking spaces would be located outside along Hemlock Street and Sutter Street.

^h Common open space: 336 square feet would be located at the outdoor entry court on Hemlock Street, 2,985 square feet would be located on a deck located on level 7, and 5,309 square feet would be provided on level 14.

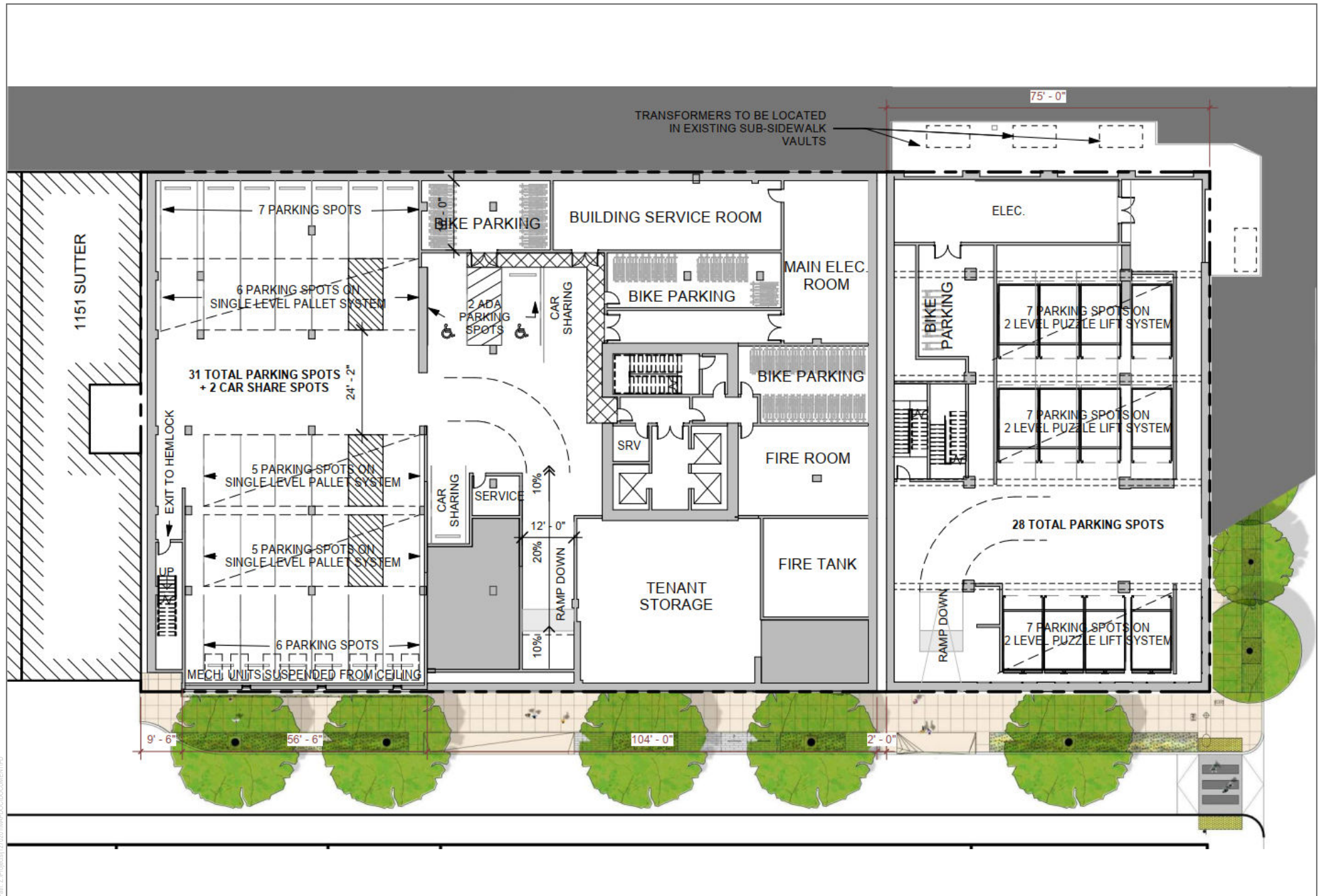
ⁱ Private open space: 3,007 square feet of private open space would be located across 46 balconies, providing an average of 65 square feet of private open space per unit.

^j Due to the downhill slope of the project site, the garage is located below grade along Sutter Street and at grade along Hemlock Street.



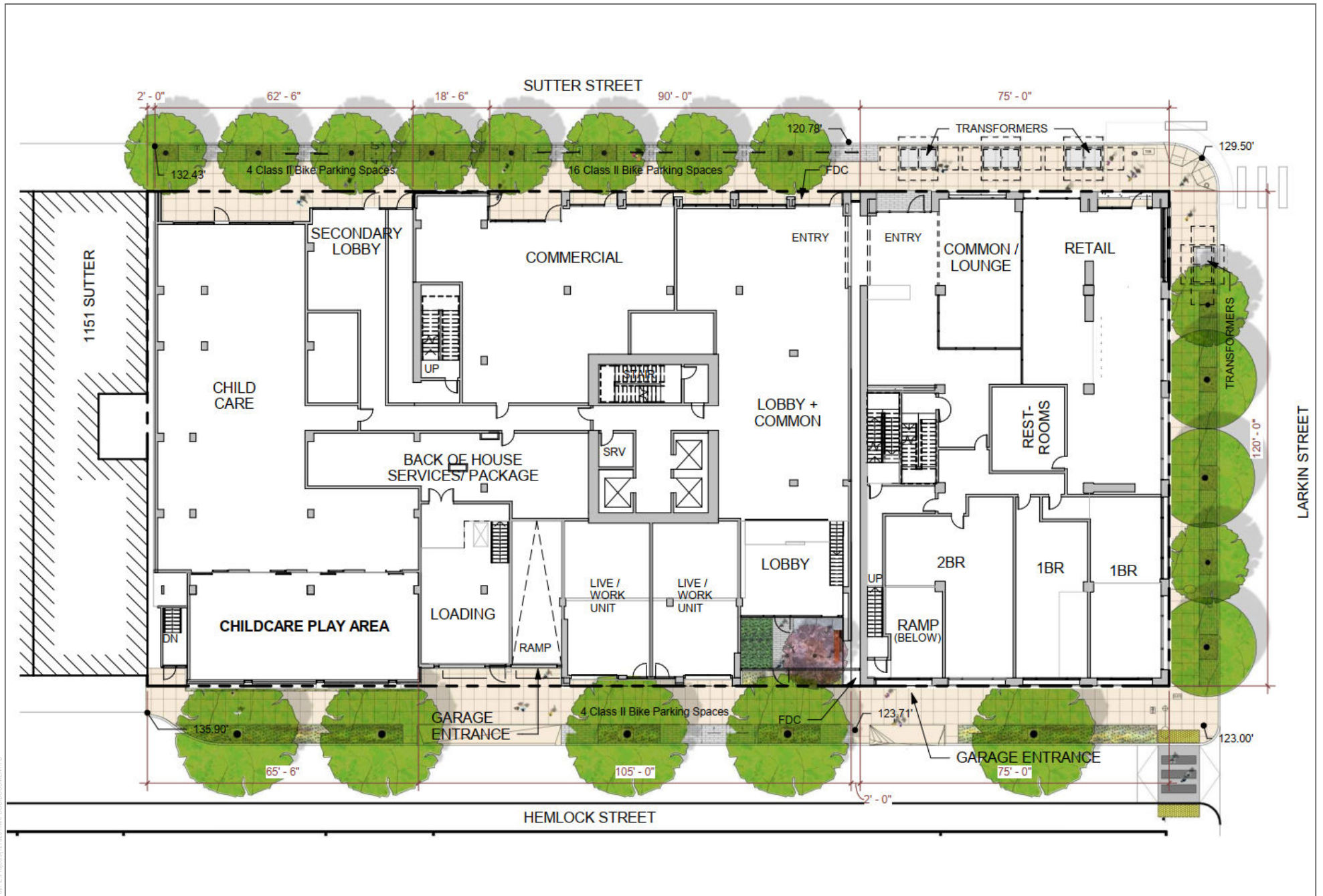
SOURCE: David Baker Architects 2021

FIGURE 2-4
Proposed Site Plan
 1101-1123 Sutter Street Project EIR



SOURCE: David Baker Architects 2021

FIGURE 2-5
Proposed Garage Plan
1101-1123 Sutter Street Project EIR



SOURCE: David Baker Architects 2021

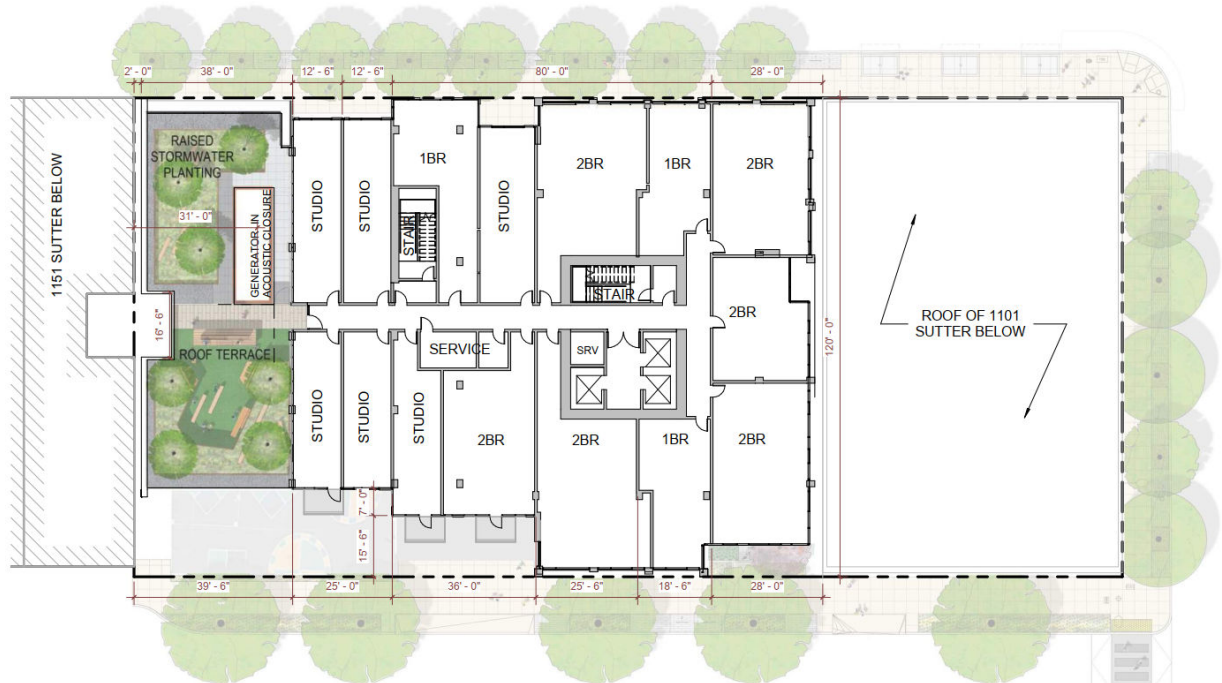
FIGURE 2-6
Proposed Sutter Street and Hemlock Street Ground Floor Level Plan

1101-1123 Sutter Street Project EIR



Note: The proposed floor plan for Levels 4 through 6 has a similar layout at 1123 Sutter Street, but 1101 Sutter Street is a three story building and does not contain any units at these levels.

Proposed Floor Plan - Levels 2 and 3



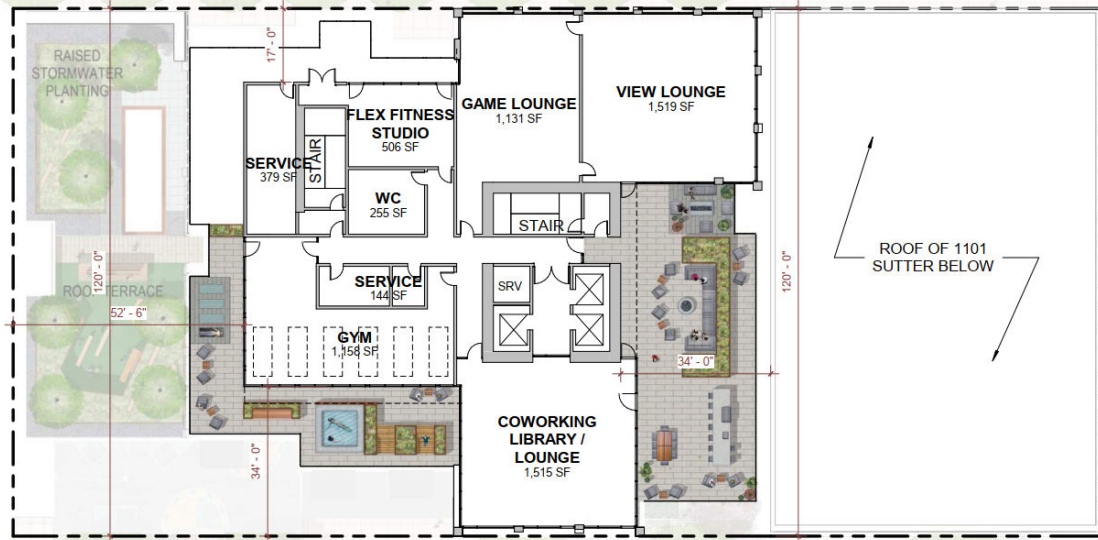
Proposed Floor Plan - Levels 7 through 13

SOURCE: David Baker Architects 2021

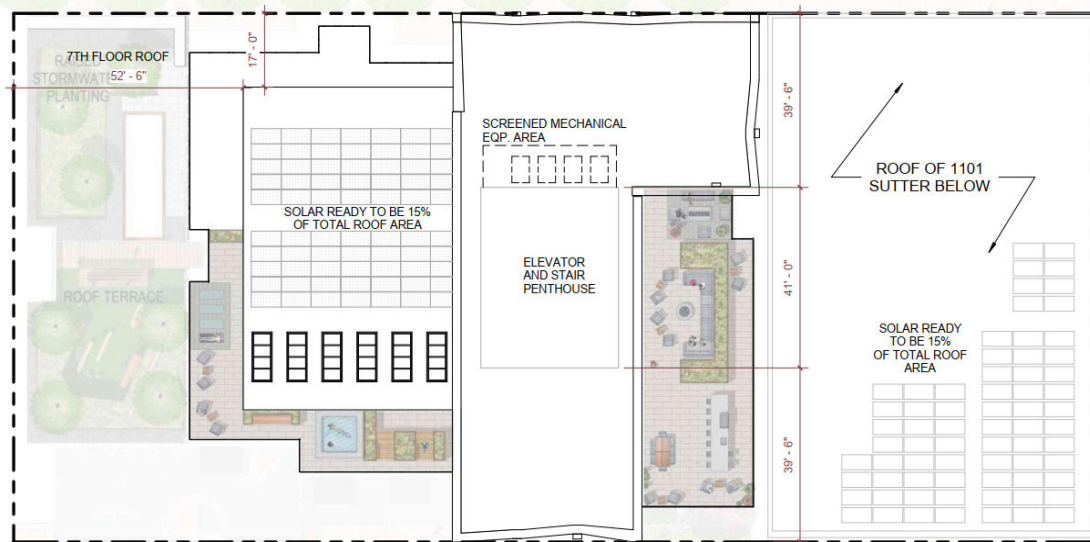
FIGURE 2-7

Proposed Floor Plans - Levels 2 through 13

1101-1123 Sutter Street Project EIR



Proposed Floor Plan - Level 14



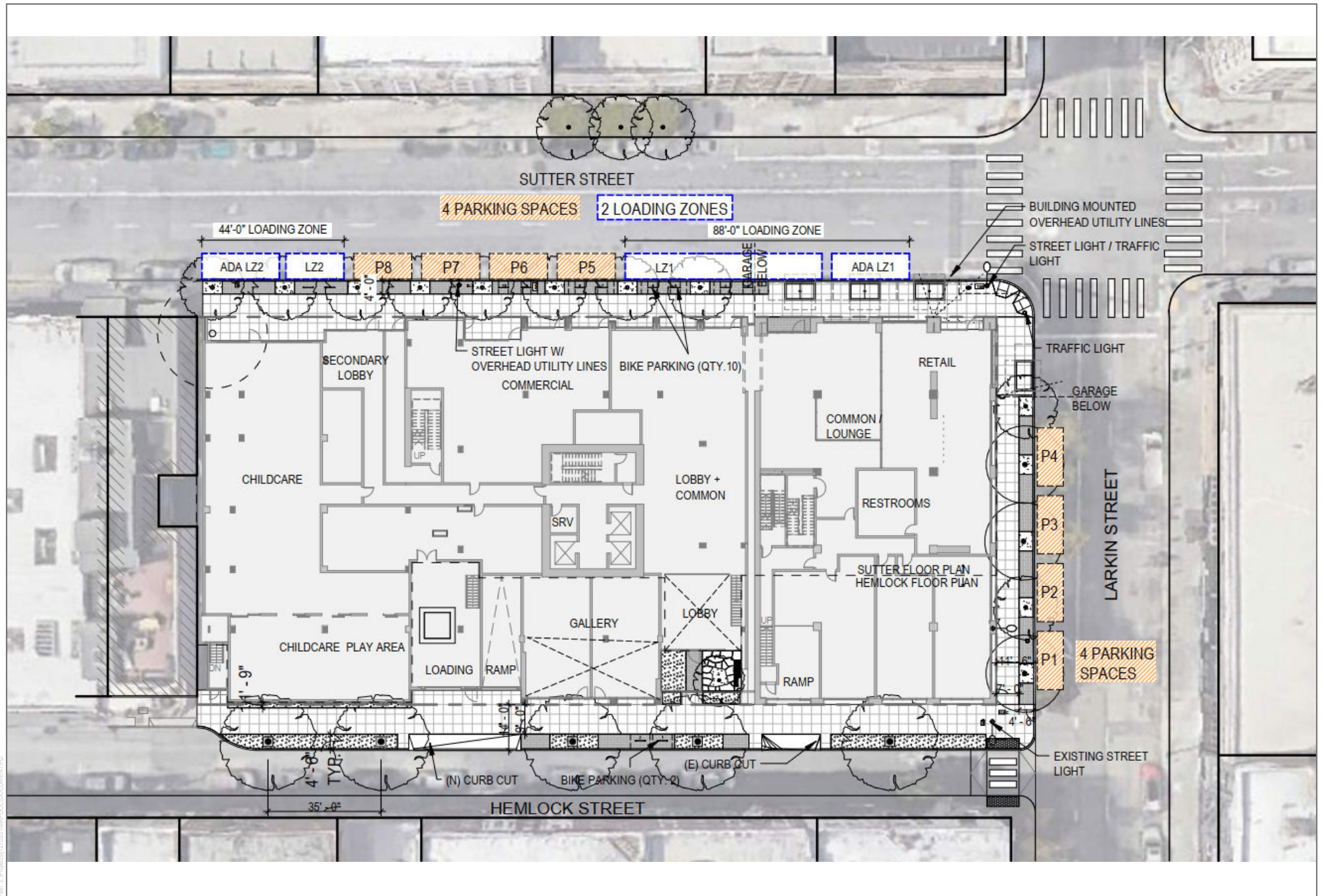
Roof Plan

SOURCE: David Baker Architects 2021

FIGURE 2-8

Proposed Floor Plans - Level 14 and Roof

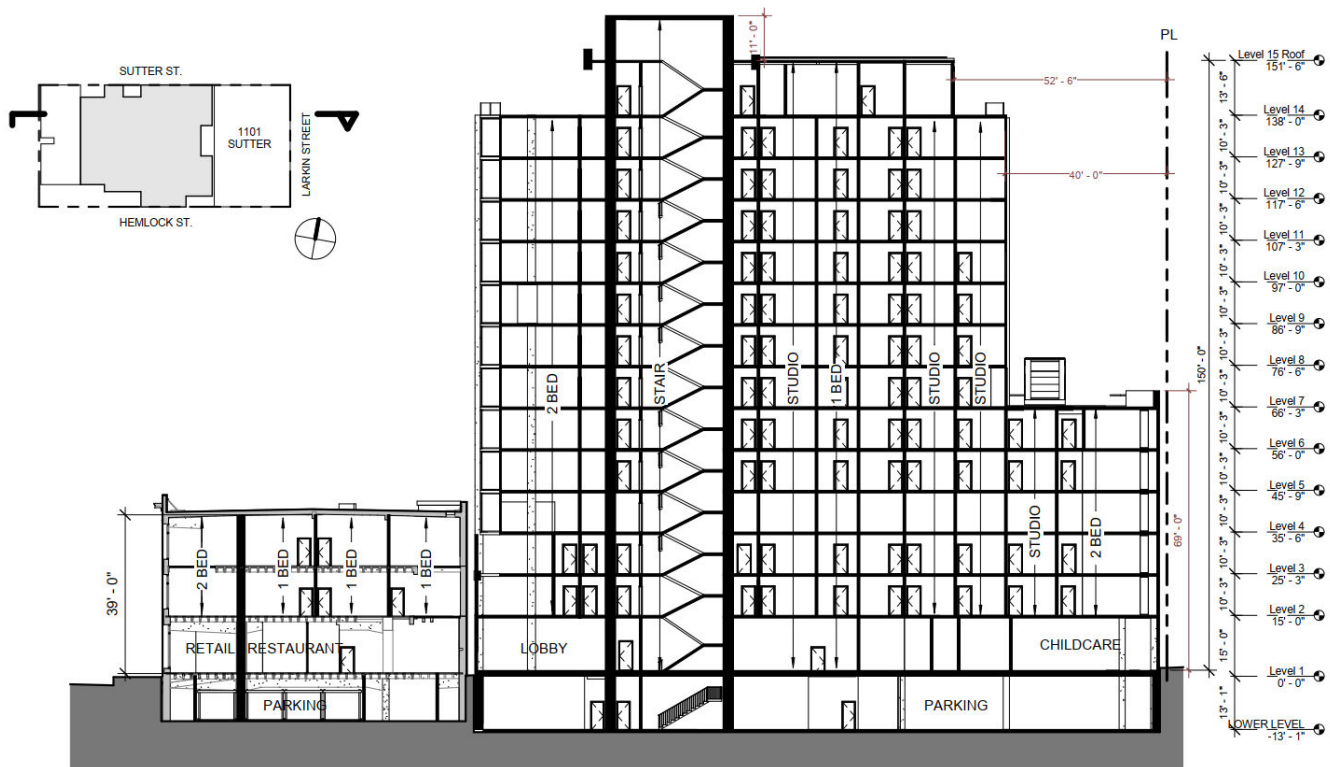
1101-1123 Sutter Street Project EIR



SOURCE: David Baker Architects 2021

FIGURE 2-9
Proposed Street Parking and Loading Plan

1101-1123 Sutter Street Project EIR



East-West Building Cross-Section



North-South Building Cross-Section

SOURCE: David Baker Architects 2021

FIGURE 2-10

Building Cross-Sections
1101-1123 Sutter Street Project EIR



Visual Simulation - View from corner of Larkin and Hemlock streets



Visual Simulation - View from east of the intersection of Sutter and Larkin streets

SOURCE: David Baker Architects 2021

FIGURE 2-11

Visual Simulations

1101-1123 Sutter Street Project EIR



SOURCE: David Baker Architects 2021

FIGURE 2-12
Visual Simulation - Aerial View from Northwest
1101-1123 Sutter Street Project EIR

2.F.1 Residential

As presented in Table 2-3, p. 2-13, the proposed project would involve constructing 221 residential units consisting of a mix of approximately 37 percent studio units, 23 percent one-bedroom units, and 40 percent two-bedroom units. The building at 1101 Sutter Street would be rehabilitated to contain 21 residential units (a mix of 67 percent one-bedroom units and 33 percent two-bedroom units), and the building constructed at 1123 Sutter Street would contain 200 residential units (a mix of 41 percent studios, 18 percent one-bedroom units, and 41 percent two-bedroom units). Figure 2-7, Proposed Floor Plans – Levels 2 through 13, p. 2-18, shows the typical proposed floor plan for levels 2 and 3 for 1101 Sutter Street and levels 2 through 6 and 7 through 13 for 1123 Sutter Street. The main residential lobby to both buildings would be accessed from Sutter Street, and a second residential entrance for both buildings would be accessed from Hemlock Street (shown on Figure 2-6, Proposed Sutter Street and Hemlock Street Ground-Floor Level Plan, p. 2-17).

The proposed project would be subject to planning code sections 415.1 through 415.11 (Inclusionary Affordable Housing Program). The proposed project would comply with planning code section 415 by providing 20 percent of the total project units as very-low-income housing units. This results in an additional 44 units provided at very-low-income. Under the state density bonus law, a project including this level of affordability is entitled to: (1) a 50 percent density bonus above the maximum allowable residential density under the City and County of San Francisco (city) general plan and planning code standards for the nearest residential district;¹⁹ (2) three concessions/incentives; and (3) waivers of development standards that would preclude development of the project with the bonus density. In this case, the 50 percent density bonus allows for 72 additional units above the 149-unit base project. Therefore, the proposed 221 residential units would be consistent with the state density bonus law. The concessions and waivers are described under Section 2.G.1, Required Approvals, p. 2-31.

2.F.2 Commercial

The proposed project would contain approximately 4,575 square feet of commercial uses at the Hemlock and Sutter street ground-floor levels of 1101 Sutter Street and 1123 Sutter Street, as shown on Figure 2-6, p. 2-17. The building at 1101 Sutter Street would be renovated to contain 2,187 square feet of ground-floor commercial space with frontage at the corner of Sutter and Larkin streets. The building at 1123 Sutter Street would contain 2,388 square feet of commercial space with frontage along Sutter Street, as shown on Figure 2-6, p. 2-17.

2.F.3 Childcare

The building at 1123 Sutter Street would provide an approximately 3,755-square-foot space intended for use as a childcare facility with an outdoor childcare play area that faces Hemlock Street (shown on Figure 2-6, p. 2-17). The primary access to this space would be from an entrance located on Sutter Street.

2.F.4 Parking Garage, Trash Storage, and Mechanical Equipment

Each building would have a separate garage, with access from Hemlock Street. Although physically separated, each garage would be accessible to residents and commercial users of both buildings. As shown in Figure 2-5, Proposed Garage Plan, p. 2-16, the garages would provide a total of 59 vehicle parking spaces. A total of 31 parking spaces would be located in the garage at 1123 Sutter Street, 2 of which would be accessible to persons

¹⁹ The nearest residential district is zoned RC-4 and allows a residential unit density of three units per lot or up to one unit per 200 square feet of lot area. The project site has a lot area of 29,700 square feet; therefore, 149 residential units is the base project before the density bonus is applied.

with disabilities. An additional 2 spaces would be car-sharing spaces. Except for the accessible and car-sharing spaces, vehicle parking at 1123 Sutter Street would be provided via a single-level puzzle system.²⁰ An additional 28 parking spaces would be located in the garage at 1101 Sutter Street. Parking at 1101 Sutter Street would be provided via a two-level puzzle system.²¹

Figure 2-5, p. 2-16, shows the bicycle and vehicle parking layout of the garages and Figure 2-6, p. 2-17, shows the bicycle parking available on the Sutter Street ground-floor level and sidewalks adjacent to the buildings. The garages would provide a total of 164 class 1 bicycle parking spaces, with 24 of the spaces located in the garage of 1101 Sutter Street and 96 located in the garage of 1123 Sutter Street, and an additional 44 class 1 bicycle parking spaces at the ground-floor level of 1123 Sutter Street. Four class 2 bicycle parking spaces would be provided along Hemlock Street near the entrance to the proposed retail space. An additional 20 class 2 bicycle parking spaces would be provided along Sutter Street near the entrances to the commercial space.

Trash storage would be located in the garage service areas of both buildings. The building's maintenance staff would move the trash from both buildings to the curb of Hemlock Street for pickup. The garage would be secured and accessible to residents and commercial tenants only.

The garage at 1123 Sutter Street would contain an electrical room and a fire room that would serve both buildings (see location indicated in Figure 2-5, p. 2-16). A backup 800-kilowatt emergency diesel generator would serve both buildings and would be contained in an acoustic enclosure on the level 7 deck at 1123 Sutter Street (see location indicated in Figure 2-7, p. 2-18). In addition, as shown in Figure 2-8, Proposed Floor Plans – Level 14 and Roof, p. 2-19, solar panels and mechanical equipment to serve both buildings would be installed on the roof of 1123 Sutter Street, including the heating, ventilation, and air-conditioning system; water heaters; and water storage tanks.

2.F.5 Circulation and Access

The project would include changes to the sidewalks and curb cuts adjacent to the project site. In total, six curb cuts would be removed and two would be replaced. Figure 2-2, p. 2-7, depicts existing conditions on the project site and Figure 2-9, Proposed Street Parking and Loading Plan, p. 2-20, depicts proposed changes to the streetscape of the project site. On Sutter Street, the existing 12-foot-wide sidewalk would be maintained; however, the existing curb cut leading to the surface parking lot at 1123 Sutter Street would be removed, and the existing curb cut leading to the entry bays of the garage at 1101 Sutter Street would be removed. On Larkin Street, the existing 12-foot-wide sidewalk would be maintained but the two existing curb cuts leading to the entry bay and the garage entrance would be removed.

On Hemlock Street, the existing 7-foot-wide sidewalk would be replaced by a 14-foot-wide sidewalk, as shown on Figure 2-9, p. 2-20. The four existing curb cuts leading to three garage entrances and one doorway of the existing Hemlock Street ground-floor levels at 1101 and 1123 Sutter Street would be removed and replaced with two new curb cuts. A 34-foot-wide curb cut would be located at the garage entrance to 1123 Sutter Street and would provide vehicle access to the garage and off-street freight loading area. An 18-foot-wide curb cut would be located at the garage entrance to 1101 Sutter Street and would provide access to this garage.

²⁰ A *puzzle system* (also known as a *pallet system*) is an automated parking system that moves cars using a grid of simple interconnected automated conveyors that slide vehicle pallets (with or without a vehicle on top) east, west, north, and south around the garage.

²¹ A *two-level puzzle system* is a similar automated parking system that allows vehicle pallets to be moved vertically across two levels, as well as east, west, north, and south around the garage.

Pedestrian curb ramps, crosswalks, and signals are provided at the nearest intersection of Larkin Street/Sutter Street to facilitate pedestrian crossing, with the exception of a curb ramp at the southwest corner of the intersection, for pedestrians traveling east-west across Larkin Street. The proposed project would include adding a curb ramp at this location.

Proposed on-street parking and loading alignments are shown on Figure 2-9, p. 2-20. The project would reconfigure the on-street parking along Sutter, Larkin, and Hemlock streets in the immediate vicinity of the project, resulting in a net removal of six parking spaces and construction of two white-curb passenger loading zones. The six existing parking spaces adjacent to the project site along the south side of Sutter Street would be replaced with two white-curb passenger loading zones and eight parking spaces. One loading zone would be at the front of 1101 Sutter Street and the other loading zone would be at the front of the proposed childcare facility at 1123 Sutter Street. The three existing parking spaces adjacent to the project site along the west side of Larkin Street would be replaced with four parking spaces. The nine existing parking spaces adjacent to the project site on the south side of Hemlock Street would be eliminated to provide space for the sidewalk widening along Hemlock Street. In addition to the on-street loading zones, a freight loading area for residents moving in and out, delivery trucks, and other service vehicles would be provided at the Hemlock Street ground-floor level of the 1123 Sutter Street building adjacent to the garage entrance ramp, as shown on Figure 2-6, p. 2-17.

As described previously, the primary residential entrances for both buildings would be accessed from Sutter Street. The residential entrance to 1123 Sutter Street would contain the main residential lobby to both buildings and would include a lounge and mailroom. An interior connection would be located between the main residential lobby at 1123 Sutter Street and the common space at 1101 Sutter Street. A second residential entrance would be accessed from the Hemlock Street ground-floor level, with stairs leading to the main residential lobby on the Sutter Street ground floor. One elevator located in 1101 Sutter Street would provide access to the building's residential units; three elevators located in 1123 Sutter Street would provide access to the building's residential units. A staircase would also be provided in each building.

Primary access to the bicycle parking on the ground floor of 1123 Sutter Street would be through the main residential lobby (shown on Figure 2-6, p. 2-17). Primary access to the bicycle parking area of the 1123 Sutter Street garage would be through the elevators in the main residential lobby (shown on Figure 2-5, p. 2-16).

2.F.6 Open Space

The proposed project would provide a total of 11,637 square feet of open space, with 49 square feet of common open space per unit and 65 square feet of private open space per unit, which exceeds the amount of open space required by planning code section 135.²² Approximately 8,630 square feet of common open space would be located at 1123 Sutter Street and would be accessible to residents of both 1101 Sutter Street and 1123 Sutter Street, as well as to commercial tenants of the building. The locations of proposed common open spaces are shown on Figures 2-6, 2-7, and 2-8, pp. 2-17 through 2-19, and would consist of an outdoor entry court along Hemlock Street, a common deck on level 7, and a common deck on level 14. The common open space areas would include both landscape and hardscape areas. Approximately 3,007 square feet of private open space would be provided in 46 private residential balconies at 1123 Sutter Street.

²² Planning code section 135 requires that a minimum of 36 square feet of private usable open space or 48 square feet of common usable open space be provided for each dwelling unit. The project provides 65 square feet of private open space per unit and 49 square feet of common open space per unit.

2.F.7 Street Trees

Planning code section 138.1 requires one street tree to be planted for every 20 feet of frontage. The project site has a total of approximately 247.5 feet of frontage along Sutter and Hemlock streets, and approximately 120 feet of frontage along Larkin Street. Therefore, 30 street trees are required for the proposed project.

The proposed project would remove the existing tree in the surface parking lot at 1123 Sutter Street. The three existing street trees located along Larkin Street would remain. In addition, 15 new street trees would be planted along Sutter, Larkin, and Hemlock streets (Figure 2-9, p. 2-20). Street-level landscaped areas totaling about 582 square feet would also be developed, providing an equivalent of seven street trees.²³ Therefore, development of the proposed project would provide a total of 25 equivalent street trees. Details of the streetscape plan, including the number and location of tree plantings, would be finalized during the building permit review process.

2.F.8 Building Design

Although the rehabilitated 1101 Sutter Street building and proposed 1123 Sutter Street building would be separate structures with different designs and façades, they would be a cohesive development with shared residential lobbies, shared common open spaces, and shared residential amenities. The parking garages would be separate but would be accessible to residents and commercial users of both buildings. Mechanical equipment and service spaces, such as heating, ventilation, and air-conditioning units and the electrical and fire rooms, would be located in 1123 Sutter Street and would serve both buildings. Visual simulations of the building are presented in Figure 2-11, Visual Simulations, and Figure 2-12, Visual Simulation – Aerial View from Northwest, pp. 2-22 and 2-23, respectively.

The project sponsor intends to rehabilitate the 1101 Sutter Street building in accordance with the Secretary of the Interior's Standards for the Treatment of Historic Properties.²⁴ Within the interior of the building, non-load-bearing walls, ramps, the basement slab, and the roof would be demolished, and the openings where the ramps are located would be infilled to create full floor plates. A new basement slab and structural upgrades would be installed. The exterior of the building would be maintained primarily as it currently is, with modifications to support the change in use from garage and automobile repair to commercial/residential uses on the ground floor, as further described below.

The primary change to the exterior of the building would be the enclosure of the entry bays along Sutter Street and Larkin Street with new glazed storefronts (Figure 2-11, p. 2-22). The southern Larkin Street garage entrance would be enclosed with stucco and a new window to match the size, configuration, and detailing of the adjacent windows. The garage entrance along Hemlock Street would remain open and would be used for entry into the garage of the rehabilitated building; however, the curb cut outside this garage entrance would be replaced as part of the sidewalk improvements described in Section 2.F.5, Circulation and Access, p. 2-25. The windows throughout the building would be either repaired or replaced in kind if the existing windows are too damaged for repair. The exterior finish and other decorative features would be repaired as needed. Section 3.B, Historic

²³ Where it is not feasible to place a street tree, San Francisco Public Works considers 75 square feet of landscaping equivalent to one street tree.

²⁴ National Park Service, *Historic Preservation Certification Application – Part 2, Description of Rehabilitation for Heald's Engineering and Automobile School, 1101 Sutter Street, San Francisco, CA 94109*. Date application received by State Historic Preservation Office: July 12, 2019. Date of transmittal to National Park Service: August 23, 2019.

David Baker Architects, Drawings for 1101 Sutter Street Rehabilitation for the State Office of Historic Preservation, February 5, 2021.

Chapter 2.

Project Description

2.F. Project Characteristics

Architectural Resources, provides a detailed discussion of the proposed rehabilitation of the historic character-defining features of the building.

As shown on Figure 2-12, p. 2-23, the proposed 1123 Sutter Street building would be composed of three different massing elements. The massing element adjacent to the 1101 Sutter Street building would be clad in a series of windows grouped together by a single façade element that would extend from the ground floor at Sutter Street and the ground floor at Hemlock Street to the top of the building. Next, the building mass would transition to a façade consisting of a panelized wall system made up of composite panels and large glass openings. The Hemlock Street elevation would have a series of projections to create balconies for each unit as shown on Figure 2-11, p. 2-22. The third massing element would step down at level 7 to a height of approximately 66 feet above Sutter Street grade to meet the height of the neighboring building at the western edge of the project site (1151 Sutter Street), which has a height of about 56 feet.

2.F.9 Construction Activities

Construction is anticipated to begin in May 2022 and would occur over approximately 30 months. Construction hours would typically be from 7 a.m. to 3:30 p.m., Monday through Friday. Limited evening work (3:30 p.m. to 5:30 p.m.) and work on Saturdays (7 a.m. to 3:30 p.m.) would be required. Construction workers would park at nearby parking lots or take public transportation to the site.

Construction would entail excavation to approximately 1 foot below the basement slab of the existing building at 1101 Sutter Street (to approximately 18 feet below the Sutter Street grade and 3 feet below the Hemlock Street grade) and an additional 3.5 to 5 feet at some locations for new footings and an elevator pit, respectively. Limited *permeation grouting* of the sand beneath the footings may be required to meet the bearing capacity recommendations for the building.²⁵ At the 1123 Sutter Street lot, construction would entail excavation to approximately 18 feet below the Sutter Street grade (approximately 8 feet below the Hemlock Street grade) and an additional 5 feet at two locations for elevator pits. A total of 9,320 cubic yards of soil would be hauled from the site. Details of construction for each building are described further below.

Hemlock Street and its northern sidewalk adjacent to the project site would be closed to traffic and pedestrians and used for construction staging for the duration of construction. Construction activities would also require the closure of a portion of the southern parking lane on Sutter Street adjacent to the project site; this area would also be used for construction staging. The sidewalks on Sutter Street and along Larkin Street would generally remain open, although temporary closures would be required to complete proposed streetscape improvements (i.e., curb cut removal and street tree planting).

A. 1101 SUTTER STREET

Construction activities at 1101 Sutter Street would generally include the following phases: (1) abatement and demolition; (2) excavation and structural upgrades; (3) construction of the interior components of the building; and (4) finishing of interiors and rehabilitation of the exterior. Abatement would be required for asbestos-containing materials and lead-based paint in the existing building.²⁶ This would be followed by demolition, which would consist of the removal of all non-concrete components of the building (e.g., non-load-bearing

²⁵ *Permeation grouting* refers to the process of injecting grout into small gaps within soil or rock, into small gaps between these materials and an existing structure, and/or into small cracks within structures themselves. Permeation grouting can be used to create or improve a water barrier and to reduce foundation and structure deformations under load.

²⁶ NorBay Consulting, Pre-Demolition Asbestos and Lead Inspection 1101 Sutter Street, San Francisco, California, April 3, 2019.

interior walls and wooden stairs) followed by the removal of concrete components (e.g., ramps and basement slab on grade) and roofing.²⁷ Concrete components removed would include the vehicle ramps inside the building; the openings where the ramps are located would be infilled to create full, usable floor plates. The existing basement slab would be removed, the ground underneath would be excavated up to approximately 1 foot, and a new basement slab would be installed. An elevator pit would be excavated to a depth of about 5 feet below the foundation. Structural upgrades would involve the installation of interior concrete *shear walls* and the installation of three new footings to a depth of about 3.5 feet below the foundation.²⁸ Limited permeation grouting of the sand beneath the footings may be required to meet the bearing capacity recommendations for the building. Rough-in, finishing of the interiors, and rehabilitation of the exterior would then occur.

Approximately 520 cubic yards of soil would be excavated and removed from the site. The excavated soils would be disposed of at an appropriate facility, depending on soil quality. It is not anticipated that any soil would be imported to the site. The proposed construction activities at 1101 Sutter Street would occur over an approximate duration of 22 months, concurrent with the construction of 1123 Sutter Street, described in the following section.

B. 1123 SUTTER STREET

Construction activities at 1123 Sutter Street would occur over approximately 30 months and would generally entail the following phases: (1) site preparation and demolition; (2) excavation and shoring; (3) foundation and below-grade construction; (4) construction of the building; and (5) finishing of interiors. Site preparation and demolition would occur over approximately one month and would include utility disconnection and hazardous materials abatement.²⁹ Abatement would be required for asbestos-containing materials and lead-based-paint in the existing building.³⁰

Excavation and shoring would occur over approximately two months. During this phase, the 1123 Sutter Street parcel would be cleared of existing fill and demolition debris and excavated. The elevations of the existing basements on the 1123 Sutter Street parcel range from 0 feet below Sutter Street grade at the northern side of the surface parking lot to 6 feet below Sutter Street grade at the southern side of the surface parking lot. The elevations of the existing basement of the mortuary building are approximately 8.5 feet below the Sutter Street grade at the western side of the building and approximately 11 feet below Sutter Street grade at the eastern side of the building. The proposed project would excavate the entire 1123 Sutter Street parcel to depths of approximately 18 feet below the Sutter Street grade (approximately 10 feet below the Hemlock Street grade). Additionally, two elevator pits would be excavated to a depth of about 5 feet below the foundation.

Approximately 8,800 cubic yards of soil would be excavated and removed from the site. The excavated soils would be disposed of at an appropriate facility, depending on soil quality. It is not anticipated that any soil would be imported to the site.

Foundation and below-grade construction would occur over approximately one month and would include installation of a reinforced mat foundation. Underpinning of the neighboring buildings to the west (1151 Sutter Street) and east (1101 Sutter Street) may be required to provide support of the building foundations during construction of the proposed building at 1123 Sutter Street. The underpinning would likely involve the

²⁷ A total area of approximately 8,600 square feet would be demolished.

²⁸ A *shear wall* is a wall designed to resist lateral forces, often for earthquake-safe design.

²⁹ A total area of approximately 45,400 square feet would be demolished.

³⁰ NorBay Consulting, Pre-Demolition Asbestos and Lead Inspection 1123 Sutter Street, San Francisco, California, April 4, 2019.

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Project Description

2.G. Intended Uses of the EIR

installation of hand-excavated piers combined with permeation grouting to harden the soils underneath the building and reduce caving potential.³¹

Pile-driving techniques would not be used to construct the foundation, although a shoring system involving *soldier pile* installation may be required around the perimeter of the construction excavation area.^{32, 33} The piles would be installed in pre-drilled holes and would not require the use of impact or vibratory driving methods.³⁴ No other use of piles is anticipated to occur during construction. *Tiebacks* may be needed on the north, south, and west sides of the site to support the shoring system.³⁵

The construction of the building, including framing and rough-in, exterior, and interior finishing, would occur over the remaining 26 months of the construction period.

2.G Intended Uses of the EIR

This is a project-specific EIR, intended to inform the public and decision makers of the impacts that the proposed project could have on historical architectural resources, and to present mitigation measures and feasible alternatives to avoid or reduce significant impacts.

The San Francisco Planning Department prepared an initial study for the proposed project indicating that the project would result in significant impacts on historical architectural resources (refer to Appendix A). For all the other environmental topics, the proposed project would result in less-than-significant impacts or impacts that would be reduced to less than significant through the implementation of mitigation measures. Therefore, the planning department has prepared this draft EIR to address the project's impacts on historical architectural resources.³⁶

This draft EIR is available for public review and comment during the public review period noted in Section 1.C.2, Draft EIR and Public Participation, p. 1-4, during which time the San Francisco Planning Commission will hold a public hearing on the draft EIR. Following the close of the public comment period, the planning department will prepare and publish a response to comments document, containing all substantive comments received on the draft EIR, as well as the planning department's responses to those comments. The document may also contain specific changes to the draft EIR. The draft EIR, together with the responses to comments document, including revisions to the draft EIR (if any) will be considered by the planning commission at a public meeting for certification and certified as a final EIR if deemed adequate, accurate, and objective. No discretionary approvals may be granted for the project until the planning commission certifies the EIR as adequate, accurate, and objective.

³¹ Rockridge Geotechnical, *Preliminary Geotechnical Investigation, Proposed Mixed-Use Development, 1101–1123 Sutter Street, San Francisco, California*, October 23, 2020.

³² *Piles* are a method by which the load of building weight can be distributed deep into the earth. *Soldier piles* are made of wide-flanged steel H sections that are driven into the ground prior to excavation; as excavation proceeds, horizontal wooden sheeting is inserted behind the H pile flanges.

³³ Rockridge Geotechnical, *Preliminary Geotechnical Investigation, Proposed Mixed-Use Development, 1101–1123 Sutter Street, San Francisco, California*, October 23, 2020.

³⁴ Rockridge Geotechnical, *Preliminary Geotechnical Investigation, Proposed Mixed-Use Development, 1101–1123 Sutter Street, San Francisco, California*, October 23, 2020.

³⁵ A tieback is a structural element commonly used to provide additional stability to retaining walls.

³⁶ Applicable CEQA regulations and guidelines are: California Public Resources Code section 21000 et seq.; CEQA Guidelines section 15000 et seq.; and San Francisco Administrative Code, chapter 31.

2.G.1 Required Approvals

The proposed project would be subject to compliance and permitting requirements under local regulations. The anticipated approvals necessary for the implementation of the proposed project are listed below.

A. ACTIONS BY THE SAN FRANCISCO PLANNING COMMISSION

- Approval of a conditional use authorization for new construction on a lot greater than 2,500 square feet (planning code section 121.1).
- Approval of a conditional use authorization to exceed the non-residential use size limit (planning code section 121.2).
- Certification of the final EIR and adoption of CEQA findings.

B. DENSITY BONUS WAIVERS AND CONCESSIONS

- Dwelling unit exposure waiver (planning code section 140) to allow for one studio unit per level, on levels 2 through 4 at 1123 Sutter Street, that would not meet the requirements for exposure to qualifying open space
- Height waiver (planning code section 260) to allow a maximum building height of 150 feet above the midpoint of Sutter Street, rather than the allowable maximum building height of 130 feet
- Bulk control waiver (planning code section 270) to allow the floors above 65 feet in height to be developed with a plan length of 131 feet and plan diagonal of 164 feet, rather than the allowable maximum plan length of 110 feet and maximum plan diagonal of 140 feet
- Rear yard waiver (planning code section 134) to allow the 3,000 square feet of required open area to be provided throughout the site rather than provided in a standard rear yard
- Setback waiver (planning code section 261.1) to allow 2,200 square feet of setback to be provided along Hemlock Street, which would meet the minimum required setback of 1,875 square feet but would not be within the standard 10-foot setback area from the street; rather, it would be at variable distances from the street (at some points more than 10 feet from the street, at some points less than 10 feet from the street).
- Active ground-floor use concession (planning code sections 145.4 and 145.1) to allow a 26-foot garage loading/entrance width at the proposed 1123 Sutter Street garage, in addition to the existing 12-foot garage entrance width at the existing 1101 Sutter Street garage, for a total of 38 feet, which exceeds the maximum allowable parking/loading entrance width of 20 feet.

C. ACTIONS BY CITY DEPARTMENTS

- Department of Public Health
 - Approval of project compliance with article 22A of the San Francisco Health Code (Maher ordinance) prior to commencement of any excavation work and approval of any soil mitigation plan that may be required
 - Approval of a ventilation plan demonstrating compliance with Article 38 of the health code that establishes air pollutant exposure zones and requires installation of enhanced ventilation systems in buildings located within these zones
 - Issuance of a certification of registration for a backup diesel generator
- Department of Building Inspection

Chapter 2.

Project Description

2.G. Intended Uses of the EIR

- Approval of site permit
 - Demolition, grading, and building permits for the demolition of the existing buildings and construction of the new building
- San Francisco Department of Public Works, Bureau of Streets and Mapping
 - Street and sidewalk permits for any modifications to public streets, sidewalks, protected trees, street trees, or curb cuts.
- San Francisco Department of Public Works
 - A waiver of the requirement for 30 equivalent street trees, as the proposed project would provide 25 equivalent street trees
 - Approval of a street space permit
- San Francisco Municipal Transportation Agency
 - Approval of the proposed curb modifications, parking modifications, parking garage operations plan, and special traffic permit (including traffic control plan)
- San Francisco Public Utilities Commission
 - Approval of any changes to sewer laterals
 - Approval of an erosion and sediment control plan prior to commencing construction
 - Compliance with post-construction stormwater design guidelines, including a stormwater control plan (which is required for projects that result in ground disturbance of an area greater than 5,000 square feet)

D. ACTIONS BY OTHER AGENCIES

- Bay Area Air Quality Management District
 - Issuance of permits for installation and operation of the emergency generator

Chapter 3

Environmental Setting, Impacts, and Mitigation Measures

3.A Introduction

This chapter provides a project-level impact analysis of the physical environmental effects of implementing the proposed 1101–1123 Sutter Street project (proposed project). The San Francisco Planning Department prepared an initial study for the proposed project indicating that the project would result in significant impacts on historic architectural resources (Appendix A). For all other environmental topics, the proposed project would result in less-than-significant impacts or impacts that would be reduced to less than significant through the implementation of mitigation measures. Therefore, this chapter focuses on the project's potential impacts to historic architectural resources.

3.A.1 Format of the Environmental Analysis

The environmental topic considered in this section, historic architectural resources, includes an introduction, a discussion of the environmental setting, regulatory framework, and impacts and mitigation measures. The information provided in the analysis 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 initial study; that is, impacts that were determined to result in a less-than-significant impact.
- **Regulatory Framework.** This subsection describes the relevant federal, state, and local regulatory requirements that are directly applicable to the environmental topic.
- **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 notice of preparation of an environmental impact report (EIR) in sufficient detail and breadth to allow a general understanding of the environmental impacts of the proposed project.
- **Impacts and Mitigation Measures.** This subsection evaluates the potential for the proposed project 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.

3.A.2 Significance Determinations

Under the California Environmental Quality Act (CEQA), a significant effect is defined as a substantial, or potentially substantial, adverse change in the physical environment. The CEQA Guidelines 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 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 the environmental impacts of the proposed project. The planning department's guidance is based on CEQA Guidelines Appendix G, with some modifications.¹ The specific significance criteria used to analyze historical architectural resources are presented before the discussion of impacts. The categories used to designate impact significance are as follows:

- **No Impact (NI).** An impact is considered not applicable (no impact) if there is no potential for impacts, or the environmental resource does not occur in the project area or the area of potential effect.
- **Less-Than-Significant Impact (LTS).** This determination applies if there is a potential for a limited 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 federal, state, and local laws and regulations.
- **Less-Than-Significant Impact with Mitigation (LSM).** This determination applies if the project would result in an adverse effect that meets the significance criteria, but feasible mitigation is available that would reduce the impact to a less-than-significant level.
- **Significant Impact (S).** This determination applies if the project would result in a substantial, or potentially substantial, adverse change that meets the significance criteria, before mitigation.
- **Significant and Unavoidable Impact, no Feasible Mitigation (SU).** This determination applies if the project would result in an adverse effect that meets the significance criteria, but for which there appears to be no feasible mitigation available to reduce the impact to a less-than-significant level. Therefore, the impact would be significant and unavoidable.
- **Significant and Unavoidable Impact, after Implementation of Feasible Mitigation (SUM).** This determination applies if it is certain that the project would result in an adverse effect that meets the significance criteria and mitigation is available to lessen the impact, but the residual effect after implementation of the measure would remain significant. Therefore, the impact is significant and unavoidable with mitigation.

3.A.3 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 for which this EIR and initial study 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 initial study 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

¹ 14 CCR 15000–15387 and Appendices A–N. Guidelines for Implementation of the California Environmental Quality Act, as amended. The CEQA Guidelines are available at: [https://govt.westlaw.com/calregs/Browse/Home/California/CaliforniaCodeofRegulations?guid=I95DAAA70D48811DEBC02831C6D6C108E&originationContext=documenttoc&transitionType=Default&contextData=\(sc.Default\)](https://govt.westlaw.com/calregs/Browse/Home/California/CaliforniaCodeofRegulations?guid=I95DAAA70D48811DEBC02831C6D6C108E&originationContext=documenttoc&transitionType=Default&contextData=(sc.Default)).

statements. Impacts and mitigation measures are numbered consecutively and include an abbreviated reference to the impact section (i.e., CR for Cultural Resources).

3.A.4 Approach to Analysis

A. PROJECT ANALYSIS

To evaluate the project impacts, this EIR addresses historic architectural impacts related to the rehabilitation of the existing 1101 Sutter Street building, a property determined to be eligible for listing in the National Register of Historic Places and the California Register of Historical Resources, and the demolition of the existing building and surface parking lot at 1123 Sutter Street, which is eligible for listing on the California Register of Historical Resources, and the construction of a new 14-story, 150-foot-tall building, as described in Chapter 2, Project Description.

B. CUMULATIVE ANALYSIS

CEQA defines cumulative impacts as “two or more individual effects, which, when considered together, are considerable, or which can compound or increase other environmental impacts.” Section 15130 of the CEQA Guidelines requires that an EIR evaluate potential environmental impacts that may be individually limited but cumulatively significant. These impacts could result from the proposed project alone, or together with other projects. The CEQA Guidelines state: “The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects.” Cumulative impacts could result from individually minor but collectively significant projects taking place over time.

As described in the initial study, this EIR uses a list-based approach to determine the appropriate reasonably foreseeable future projects for consideration in the cumulative analysis. As of the publication of the notice of preparation of an EIR (see Appendix B of this EIR), there were 10 development, renovation, and/or change-of-use projects within approximately a 0.25-mile radius of the project site that were considered in the cumulative analysis. Table 1, p. 14, of the initial study lists relevant projects, and the locations of the cumulative projects are shown on Figure 1, p. 16, of the initial study and also included in Table 3-1 below.

Table 3-1 Cumulative Projects within 0.25 miles of Project Site

Address	Record ID	Approximate Distance from Project Site (feet)	Project Description
955 Post Street	2015-015950PRJ	340	The project would demolish the existing two-story automobile repair garage building and construct an eight-story, 80-foot-tall mixed-use residential and commercial building over a basement with 69 residential units and approximately 1,538 square feet of ground-floor retail space. The residential portion of the project would include nine three-bedroom units, 36 two-bedroom units, and 24 one-bedroom units. In addition, the project would provide approximately 4,945 total square feet of common outdoor space at the basement level. Five dwelling units on the sixth story would also include private outdoor patios.
1033 Polk Street	2014.0914PRJ	410	The project would demolish the existing building and construct an eight-story, 85-foot-tall mixed-use residential building with ground-floor retail space and residential uses above. The ground floor would contain approximately 605 gross square feet of retail space, the residential lobby, and required mechanical space. The proposed project would include a total of 19 residential units, including 18 one-bedroom units and one two-bedroom unit, above the ground-floor retail space.
3 Meacham Place	2020-007597PRJ	460	The project would change the use of the existing buildings from single-family dwelling and office to group housing (congregate residence).
1000 Sutter Street	2020-008130PRJ	460	<p>The City and Episcopal Community Services, as co-applicants, propose to purchase the Granada Hotel and enter into an agreement with Episcopal Community Services to operate the project as permanent supportive housing for formerly homeless individuals. The Granada Hotel is located at 1000 Sutter Street, a 232-unit single-room occupancy hotel. Eighty units are currently occupied by low-income individuals, primarily reliant on short-term rental subsidy vouchers; 152 units are vacant. Episcopal Community Services and the City agree to restrict the property for at least 55 years to provide affordable housing and to serve households who are homeless, at risk of homelessness, or impacted by COVID-19.</p> <p>Episcopal Community Services plans to provide on-site support services that include intensive case management; individual health and wellness plans, which may include substance use disorder treatment and/or behavioral health services; financial assistance, including help with benefit programs and entitlements; and job-readiness, vocational, occupational, and educational training.</p>

Address	Record ID	Approximate Distance from Project Site (feet)	Project Description
1240 Bush Street	2020-004634PRJ	580	The project would add five new accessory dwelling units to an existing 16-unit building. Exposure is non-compliant for three of the proposed dwelling units.
1200 Van Ness Avenue	2015-012577PRJ	610	The project would construct a 13-story, 130-foot-tall building with 259,621 gross square feet of mixed use (retail/commercial/residential) space and a parking garage for 368 cars in five below-grade levels. The project retail uses could include a grocery store, medical offices and clinics on Level 2 through Level 5, and an eight-story residential tower with 95 dwelling units (71 one bedrooms and 24 two bedrooms).
1525 Pine Street	2015-009955PRJ	700	The project would demolish the existing one-story commercial restaurant and construct a new eight-story mixed-use commercial and residential building. The project relies on State Density Bonus provisions for an additional six units over the base density of 15 units, for a total of 21 residential units.
921 O'Farrell Street	2018-014727PRJ	1,030	The project would demolish the existing two-story commercial building and construct a 14-story, 130-foot-tall residential tower with ground-floor commercial and common space.
1501 Van Ness Avenue	2020-000549PRJ	1,140	The project would demolish a sales kiosk at an existing Chevron station and construct a new, larger sales kiosk; modify the existing fueling canopy structural columns; remove four existing underground fuel storage tanks and associated piping; and install three new underground fuel storage tanks and piping.
901 Van Ness Avenue	2018-001547PRJ	1,420	The project would remodel an existing automobile sales facility. Work would include demolition of existing non-original interior partitions and existing glazing for new entrance at Olive Street; construction of new offices at Historic Showroom and new mezzanine, stairs, landing, opening and entry at Olive Street; new vestibule and opening, partitions, finishes, and architectural features associated with these areas; and exterior restoration of original conditions.

SOURCE: San Francisco Planning Department, October 2020.

NOTE:

The anticipated construction periods of the cumulative projects are not known; therefore, the cumulative analyses assume that construction of the cumulative projects could overlap with construction of the proposed project.

3.B Historical Architectural Resources

3.B.1 Introduction

A *historical resource* is defined in CEQA Guidelines Section 15064.5(a) as one that is listed in, or determined eligible for listing in, the California Register of Historical Resources. This subsection describes historic architectural resources on the project site; identifies potential historic architectural resources in the vicinity of

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the project site; and evaluates potential direct and indirect impacts to those resources that could result from the proposed project.

For the purposes of this EIR, the term *historical architectural resource* is used to distinguish such resources from archeological resources, which may also be considered historical resources under CEQA. The initial study (see Appendix B) concluded that with implementation of standard mitigation measures for unanticipated discovery, the proposed project would not cause significant adverse impacts to archeological resources pursuant to CEQA Guidelines section 15064.5 or human remains. Therefore, further discussion of archeological and other cultural resources is not required in this EIR.

Project impacts on historical resources are analyzed in two steps. The first analysis determines whether a project may impact a resource that falls within the definition of historical resource(s) under CEQA. If the project is found to impact historical resources, a second analysis then determines whether the project would cause a substantial adverse change to the resource. A project that may cause a substantial adverse change in the significance of a historical resource is one that may have significant effects on the environment (CEQA Guidelines Section 21084.1).

This chapter is based on information provided in the Historical Resource Evaluation prepared by Architectural Resources Group (ARG) for 1123 Sutter Street for the proposed project (see Appendix D) and a part I and part II historic resource evaluation response prepared by the planning department for 1101–1123 Sutter Street that includes a determination regarding the historical resource status of the buildings on the project site and the potential project impacts to historic district resources.^{2, 3, 4} Photographs of the existing buildings are on the project site are shown on Figure 2-3, on p. 2-10.

3.B.2 Regulatory Framework

This subsection describes the applicable state and local laws and regulations that pertain to the identification and regulation of historic architectural resources. There are no federal laws or regulations that apply to this project site, because the project is not federally funded and does not require federal permitting.

However, as described in Chapter 2, Project Description, the project sponsor is seeking Federal Rehabilitation Tax Credits for 1101 Sutter Street (see Appendix C) and the project description specifically states that 1101 Sutter Street would be rehabilitated in conformance with the Secretary's Standards.^{5, 6} As such, modifications to this building are being reviewed by the National Park Service for conformance with the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings.⁷

² ARG, *1123 Sutter Street Historic Resource Evaluation*, prepared for Martin Building Company, November 4, 2019.

³ San Francisco Planning Department, Part I Historic Resources Evaluation Response for 1101–1123 Sutter Street, July 2020.

⁴ San Francisco Planning Department, Part II Historic Resources Evaluation Response for 1101–1123 Sutter Street, November 2020.

⁵ VerPlanck, C., *National Park Service Historic Preservation Certification Application Part I – Evaluation of Significance*, prepared by VerPlanck Historic Preservation Consulting, San Francisco, CA, 2019. Submitted to the California Office of Historic Preservation.

⁶ VerPlanck, C., *National Park Service Historic Preservation Certification Application Part 2 – Description of Rehabilitation*, prepared by VerPlanck Historic Preservation Consulting, San Francisco, CA, 2019. Submitted to the California Office of Historic Preservation.

⁷ Weeks and Grimmer, *The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring & Reconstructing Historic Buildings*, U.S. Department of the Interior, National Park Service, Technical Preservation Services, Washington, DC, 1995 (revised by A. Grimmer 2017).

A. FEDERAL

National Register of Historic Places

While there is no federal nexus for this project, as described above, resources were evaluated in consideration of National Register designation criteria. The National Register is the United States' official list of districts, sites, buildings, structures, and objects worthy of preservation. Overseen by the National Park Service, under the U.S. Department of the Interior, the National Register was authorized under the National Historic Preservation Act, as amended. Its listings encompass all national historic landmarks, as well as historic areas, administered by the National Park Service.

National Register guidelines for the evaluation of historical significance were developed to be flexible and to recognize the accomplishments of all who have made significant contributions to the nation's history and heritage. Its criteria are designed to guide state and local governments, federal agencies, and others in evaluating potential entries in the National Register. For a property to be listed in, or determined eligible for listing in, the National Register, it must be demonstrated to possess integrity and to meet at least one of the following criteria:

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

- A. That are associated with events that have made a significant contribution to the broad patterns of our history; or*
- B. That are associated with the lives of persons significant in our past; or*
- C. That embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or*
- D. That have yielded, or may be likely to yield, information important in prehistory or history.*

Integrity is defined in the National Register guidance, "How to Apply the National Register Criteria," as "the ability of a property to convey its significance. To be listed in the National Register of Historic Places, a property must not only be shown to be significant under the National Register criteria, but it also must have integrity."⁸ The National Register criteria recognize seven aspects or qualities that, in various combinations, define integrity. These are location, design, setting, materials, workmanship, feeling, and association:

- **Location** is the place where the historic property was constructed or the place where the historic event occurred.
- **Setting** is the physical environment of a historic property.
- **Design** is the combination of elements that create the form, plan, space, structure, and style of a property.

⁸ National Park Service, How to Apply the National Register Criteria for Evaluation, National Park Service, Cultural Resources, available at: https://www.nps.gov/subjects/nationalregister/upload/NRB-15_web508.pdf, 1990 (revised 1997).

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- **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

National Register guidance further asserts that properties must be completed at least 50 years ago to be considered for eligibility. Properties completed less than 50 years before evaluation must be proven to be "exceptionally important" (criteria consideration to be considered for listing).

B. STATE

CALIFORNIA OFFICE OF HISTORIC PRESERVATION

The State of California implements the National Historic Preservation Act through its statewide comprehensive cultural resource surveys and preservation programs. The California Office of Historic Preservation is part of the California Department of Parks and Recreation and implements the policies of the National Historic Preservation Act 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 who implements historic preservation programs in the state's jurisdiction and is housed at the historic preservation office.

CALIFORNIA ENVIRONMENTAL QUALITY ACT

CEQA Guidelines section 15064.5(a), in Title 14 of the California Code of Regulations,⁹ defines a historical resource as:

1. A resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources.
2. A resource included in a local register of historical resources, as defined in section 5020.1(k) of the Public Resources Code or identified as significant in an historical resource survey meeting the requirements section 5024.1(g) of the Public Resources Code, shall be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.
3. Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the California Register of Historical Resources...
4. The fact that a resource is not listed in, or determined to be eligible for listing in the California Register of Historical Resources, not included in a local register of historical resources (pursuant to

⁹ 14 CCR 15000–15387 and Appendices A–N, Guidelines for Implementation of the California Environmental Quality Act, as amended.

section 5020.1(k) of the Public Resources Code), or identified in an historical resources survey (meeting the criteria in section 5024.1(g) of the Public Resources Code) does not preclude a lead agency from determining that the resource may be an historical resource as defined in Public Resources Code sections 5020.1(j) or 5024.1.

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

CALIFORNIA REGISTER OF HISTORICAL RESOURCES

The California Register is “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.”¹⁰ The criteria for eligibility for listing in the California Register are based on National Register of Historic Places eligibility criteria.¹¹ Certain resources are determined by the statute to be automatically included in the California Register, including California properties formally determined eligible for or listed in the National Register.¹²

To be eligible for listing in the California Register 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 adapted from the CEQA Guidelines section 15064.5(a)(3)¹³:

- Criterion 1: Is associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage;
- Criterion 2: Is associated with the lives of persons important in our past;
- Criterion 3: Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
- Criterion 4: Has yielded, or may be likely to yield, information important in prehistory or history.

For a resource to be eligible for listing in the California Register, it must also retain enough *integrity* to be recognizable as a historical resource and to convey its significance.¹⁴ A resource that does not meet the National Register integrity threshold may still be eligible for listing in the California Register.

SECRETARY OF THE INTERIOR’S STANDARDS FOR THE TREATMENT OF HISTORIC PROPERTIES

Where a project has been determined to conform with the Secretary of the Interior’s Standards for the Treatment of Historic Properties (Secretary’s Standards), the project’s impact on historical resources would be considered mitigated to below a level of significance and therefore not significant, per section 15126.4(b)(1) of the CEQA

¹⁰ California Public Resources Code section 5024.1(a).

¹¹ California Public Resources Code section 5024.1(b).

¹² California Public Resources Code section 5024.1(d).

¹³ 14 CCR 15000–15387 and Appendices A–N, Guidelines for Implementation of the California Environmental Quality Act, as amended.

¹⁴ *Integrity* is defined as “the authenticity of an historical resource’s physical identity evidenced by the survival of characteristics that existed during the resource’s period of significance.” California Office of Historic Preservation, *Technical Assistant Series No. 7, How to Nominate a Resource to the California Register of Historic Resources*, Sacramento, CA: California Office of State Publishing, September 4, 2001.

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Guidelines. In most cases, a project that demonstrates conformance with the Secretary's Standards is categorically exempt from CEQA, as described in the CEQA Guidelines section 15126.4(b)(1):

Where maintenance, repair, stabilization, rehabilitation, restoration, preservation, conservation or reconstruction of the historical resource will be conducted in a manner consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings, the project's impact on the historical resource shall generally be considered mitigated below a level of significance and thus is not significant.

The Secretary's Standards is a series of concepts focused on maintaining, repairing, and replacing historic materials, as well as designing new additions or making alterations. The standards function as common-sense historic preservation principles that promote historic preservation best practices. There are four distinct approaches that may be applied to the treatment of historical resources:

- Preservation focuses on the maintenance and repair of existing historic materials and retention of a property's form as it has evolved over time.
- Rehabilitation acknowledges the need to alter or add to a historic property to meet continuing or changing uses while retaining the property's historic character.
- Restoration depicts a property at a particular period of time in its history, while removing evidence of other periods.
- Reconstruction recreates vanished or non-surviving portions of a property for interpretive purposes.

The choice of treatment depends on a variety of factors, including the property's historical significance, physical condition, proposed use, and intended interpretation. Rehabilitation was determined to be the most appropriate treatment option for the proposed project because it allows for a compatible use for the property through repair, alterations, and additions while preserving those portions or features that conveys its historical and architectural values.

The CEQA Guidelines provide general design and technical recommendations to assist in applying the Secretary's Standards to a specific property. Together, the Secretary's Standards and the CEQA Guidelines provide a framework that guides important decisions concerning proposed changes to a historic property.

Standards for Rehabilitation

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, 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.

C. LOCAL

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 and is still in progress by the planning department. However, the commitment of the City and County of San Francisco (the city) to historic preservation is codified generally in section 101.1 of the San Francisco 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 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 general plan's urban design element addresses historic preservation and includes the following objective and policies¹⁵:

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

¹⁵ San Francisco Planning Department, *San Francisco General Plan*, available online at <https://generalplan.sfplanning.org/>, 1945 (as amended).

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

PLANNING DEPARTMENT CEQA REVIEW PROCEDURES FOR HISTORICAL RESOURCES

As a *certified local government* and the lead agency in CEQA determinations,¹⁶ the city has instituted guidelines for initiating CEQA review of historic resources. The planning department's CEQA Review Procedures for Historical Resources incorporates the state's CEQA Guidelines into the city's existing regulatory framework.¹⁷ To facilitate the review process, the planning department has established the following categories to establish the baseline significance of historic properties based on their inclusion in cultural resource surveys and/or historic districts:

Category A – Historical Resources is divided into two sub-categories:

- **Category A.1** – Resources listed on or formally determined to be eligible for listing in the California Register. These properties will be evaluated as historical resources for purposes of CEQA. Only the removal of the property's status as listed in or determined to be eligible for listing in the California Register by the California Historic Resources Commission will preclude evaluation of the property as a historical resource under CEQA.
- **Category A.2** – Adopted local registers, and properties that have been determined to appear or may become eligible for inclusion in the California Register. These properties will be evaluated as historical resources for purposes of CEQA. Only a preponderance of the evidence demonstrating that the resource is not historically or culturally significant will preclude evaluation of the property as a historical resource. In the case of Category A.2 resources included in an adopted survey or local register, generally the "preponderance of the evidence" must consist of evidence that the appropriate decision maker has determined that the resource should no longer be included in the adopted survey or register.
 - Where there is substantiated and uncontroverted evidence of an error in professional judgment, of a clear mistake, or that the property has been destroyed, this may also be considered a "preponderance of the evidence that the property is not a historical resource."
- **Category B** – Properties Requiring Further Consultation and Review. Properties that do not meet the criteria for listing in Categories A.1 or A.2, but for which the city has information indicating that further consultation and review will be required for evaluation whether a property is a historical resource for the purposes of CEQA.
- **Category C** – Properties Determined Not to Be Historical Resources or Properties for which the City Has No Information Indicating that the Property is a Historical Resource. Properties that have been affirmatively determined not to be historical resources, properties less than 45 years of age, and properties for which the City has no information.

SAN FRANCISCO HISTORIC PRESERVATION COMMISSION AND PLANNING CODE, ARTICLES 10 AND 11

The San Francisco Historic Preservation Commission is 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 historic preservation commission reviews and provides comments on environmental documents under CEQA for projects affecting historical resources and reviews and comments

¹⁶ *Certified local government* means a local government that has been certified by the National Park Service to carry out the purposes of the National Historic Preservation Act of 1966 (16 USC section 470 et seq.) as amended, pursuant to section 101(c) of that act and the regulations adopted under the act that are set forth in Part 61 (commencing with section 61.1) of Title 36 of the Code of Federal Regulations.

¹⁷ San Francisco Planning Department, San Francisco Preservation Bulletin No. 16, City and County of San Francisco Planning Department CEQA Review Procedures for Historic Resources, March 31, 2008.

on any agreements proposed under the National Historic Preservation Act where the city would be a signatory. The historic preservation commission also approves certificates of appropriateness for landmarks and properties in article 10 historic districts. The city reviews the historical resources designated under articles 10 and 11 of the planning code when it evaluates project impacts on historical resources. Article 10 describes procedures regarding the preservation of sites and areas of special character or special historical, architectural, or aesthetic interest or value, such as officially designated city landmarks and buildings included in locally designated historic districts. Article 11 of the planning code designated six downtown conservation districts.

3.B.3 Environmental Setting

The project site is composed of the eastern half of the block bounded by Larkin and Polk streets on the east and west, respectively, and Sutter and Hemlock streets on the north and south, respectively. The project site is located in the Downtown/Civic Center neighborhood. The project site includes 1101 and 1123 Sutter Street, located on Assessor's Parcel Number (APN) 0692-001 and 0692-019, respectively.

The project site is located approximately 0.5 miles north of the Civic Center, which includes the city hall and other government buildings, and the performing arts complex, which includes Davies Symphony Hall, the opera house, and Herbst Theater. The surrounding area consists primarily of three- to six-story brick-and-concrete mixed-use buildings with commercial uses on the ground floor and apartments or residential hotel rooms on the upper floors. A two-story building with a grocery store and restaurants is on the same block, west of the project site, and a two-story community youth center is across Hemlock Street to the south of the project site. Buildings adjacent to and across the street from the project site range from about 20 to 60 feet in height and some buildings on adjacent blocks reach up to about 130 feet in height.

The buildings in the vicinity of the project site were constructed in the early 1900s, with the exception of the adjacent building immediately west of the site (1151 Sutter Street), which is a nine-unit condominium complex with office space on the ground floor that was built in 2009. Many of the buildings to the north, east, and south of the project site are contributors to the National Register-listed Lower Nob Hill Apartment Hotel Historic District. However, the existing buildings on the project site are not contributors to this district, nor are other buildings on the block, west of the project site.

The historical resources on the project site are summarized in Table 3-2. The existing buildings on the project site were examined in several historical studies, including the William Kostura report for 1101 Sutter Street, Historic Preservation Certification Application: Part 1 – Evaluation of Significance, prepared by Christopher VerPlanck, ARG 2019 report for 1123 Sutter Street and the two historic resource evaluation responses (parts I and II) prepared by the planning department.^{18, 19, 20, 21, 22} The historic resource evaluation prepared by ARG evaluated 1123 Sutter Street and found the building individually eligible for listing in the California Register under criteria 1, 2, and 3, but not eligible as a contributor to the adjacent historic district. ARG's findings received concurrence from the planning department in the part I historic resource evaluation response. The planning department summarized the historic status of 1101 Sutter Street as part of the part II historic resource evaluation response and agreed with previous evaluations that found the building eligible for listing in the California Register under

¹⁸ William Kostura, *Van Ness Auto Row Support Structures*, prepared for San Francisco Department of City Planning, 2010.

¹⁹ VerPlanck, C., *National Park Service Historic Preservation Certification Application Part I – Evaluation of Significance*, prepared by VerPlanck Historic Preservation Consulting, San Francisco, CA, 2019. Submitted to the California Office of Historic Preservation.

²⁰ ARG, *1123 Sutter Street Historic Resource Evaluation*, prepared for Martin Building Company, November 4, 2019.

²¹ San Francisco Planning Department, Part I Historic Resources Evaluation Response for 1101–1123 Sutter Street, July 2020.

²² San Francisco Planning Department, Part II Historic Resources Evaluation Response for 1101–1123 Sutter Street, November 2020.

criteria 1 and 3, but not eligible as a contributor to the adjacent historic district. Therefore, both 1101 and 1123 Sutter Street qualify as individually eligible historical resources under CEQA but are not contributors to the adjacent Lower Nob Hill Apartment Hotel historic district, nor are they within the boundaries of this historic district.

A. HISTORICAL ARCHITECTURAL RESOURCES ON THE PROJECT SITE

This section describes the two historical architectural resources on the project site – 1101 and 1123 Sutter Street (Table 3-2).

Table 3-2 Historic Architectural Resources Eligibility Status (within Project Site)

Building	APN	Date of Construction	Uses/Building Characteristics	Significance
1101 Sutter Street	0692-001	1920	Three-story reinforced concrete automobile repair/garage building	<ul style="list-style-type: none"> NR-eligible CRHR-eligible Historical resource for CEQA
1123 Sutter Street	0692-019	1926	One-story brick building/commercial retail uses	<ul style="list-style-type: none"> CRHR-eligible Historical resource for CEQA

SOURCE: William Kostura 2010; ARG 2019; San Francisco Planning Department 2019.

NOTES:

APN = Assessor's Parcel Number

NR = National Register of Historic Places

CRHR = California Register of Historical Resources

CEQA = California Environmental Quality Act

1101 SUTTER STREET

BUILDING DESCRIPTION

Built in 1920, the building at 1101 Sutter Street on APN 0692-001 is a three-story-over-basement, reinforced-concrete frame (with brick infill), commercial garage with a flat roof concealed behind a raised parapet, and is finished in stucco on the three street-facing façades.²³ Constructed as an automobile mechanics trade school, the otherwise utilitarian building exhibits a modest amount of Classical Revival ornament. Although all three of the street-facing façades are finished in stucco, only the north and east façades, which face Sutter and Larkin streets respectively, exhibit ornamentation. The stucco on these two façades is scored to imitate stone masonry construction. In contrast, the windowless west façade, which is mostly concealed behind the adjoining building at 1123 Sutter Street, is painted brick without any ornament or fenestration.

The north (primary) façade along Sutter Street contains the main entrance to the building. At street level, the first floor consists of two double-width, open-air vehicular bays. Created after 1935, these bays provide access to a small surface parking lot in the left bay (formerly a gas station) and a ramp up to the second and third floors in the right bay. Visible at the rear of the left bay is a corrugated-metal roll-up door and a pedestrian door protected behind a metal security gate. To the right of the pedestrian entrance is a small business office that projects into

²³ San Francisco Planning Department, Part I Historic Resources Evaluation Response for 1101–1123 Sutter Street, July 2020.

the parking lot area. A narrow band of scored stucco separates the first and second floors on the north façade. The second- and third-floor levels are identical, consisting of four rectangular window openings on each floor level. Each opening contains a multi-*lite* wood window divided into three sections by vertical *mullions*.^{24, 25} The narrow corner sections of each window contain operable pivot sashes divided into six lites each. The wider central section of each window is fixed and divided into 15 lites. A horizontal mullion runs along the top of the windows, forming a transom. Separating the second- and third-floor levels is a row of recessed *spandrels* ornamented with plaster urns.²⁶ The north façade is capped by a narrow plaster molding, a frieze embellished with *roundels*, a molded sheet-metal cornice, and a raised parapet.²⁷ There is a 1960s-era backlit blade sign that reads “PARK” attached to the northeast corner of the building.

The east façade of the building along Larkin Street is very similar to the north façade except that it is one bay longer. In addition, because the terrain slopes downhill toward the south, a portion of the basement is daylighted at the southeast end of the building. The first-floor level contains two vehicular entrances, including one in the second bay that provides access to the basement and an open-air entrance at the right that provides access to the previously described parking lot at the front of the building. The basement entrance contains a non-historic metal roll-up door with a hollow-core metal pedestrian door to the right. Above it is a band of plywood paneling that encloses an original window. The entrance to the parking lot contains no fenestration. The remaining three bays at the first-floor level contain multi-*lite* wood windows matching those previously described on the north façade, except that they are higher. Metal security bars are attached in front of the windows in the third and fourth bays. There is also a daylight window illuminating the basement level in the first bay. Above the first floor, the second- and third-floor levels are finished and detailed exactly like the north façade, including the windows, spandrels, and cornice.

The south façade of the subject property faces Hemlock Street, a narrow mid-block alley connecting Polk and Larkin streets. Similar to the north façade, the south façade is four bays wide and is finished in stucco, but the stucco is not scored, aside from a narrow return adjoining Larkin Street. More of the basement level is exposed on this façade than along Larkin Street. At the left side of the south façade is a vehicular entrance that provides access to the basement. It contains a non-historic, corrugated-metal roll-up door. Daylight windows are located in the remaining three bays. The first-floor level contains three large windows. The window in the left bay was modified in the early 1990s when the roll-up door was installed, and it now contains a non-historic anodized-aluminum window. The remaining three bays contain multi-*lite* wood windows that match those on the north and east façades. The second- and third-floor levels are identical, each containing four multi-*lite* wood windows. There is no ornament on the south facade, and it terminates with a blank frieze and raised parapet.

The west façade of the subject property faces the interior of the block. It is windowless and made of painted brick without any ornament.

BUILDING HISTORY

The building at 1101 Sutter Street was built in 1920 by architect Samuel S. Heiman and contractor Monson Brothers. In spring of 1921, Heald’s Business College’s Engineering and Automobile School moved into the new building at 1101 Sutter Street. Heald’s Business College was founded in San Francisco in 1863 by Edward P. Heald as a business college and trade school for working-class and lower-middle-class San Franciscans. The college,

²⁴ A *lite* is a single pane of glass.

²⁵ A *mullion* is a bar/element (real or simulated) dividing the panes of glass in a window.

²⁶ A *spandrel* refers to the space between the top of the window in one story and the sill of the window in the story above.

²⁷ A *roundel* is a circular decorative element, such as a disc or a round panel or window.

Chapter 3.

Environmental Setting, Impacts, and Mitigation Measures

3.B. Historical Architectural Resources

which offered courses in accounting, typewriting, mercantile law, banking, mechanical drawing, business English, and many other subjects, was the first business college in the western United States. The engineering and automobile school, which had previously been located at 1220 Post Street, near the heart of Van Ness Auto Row, decided to lease the building at 1101 Sutter Street because it was much larger than the school's previous facilities and enrollment was steadily growing. The engineering and automobile school remained at 1101 Sutter Street from 1921 until 1935, when it moved to 915 North Point Street.

In 1935, 1101 Sutter Street's new tenant commissioned several improvements to the building to convert it into a commercial parking garage. In addition to parking, Roy Court's Sutter-Larkin Garage offered ancillary services like lubrication and other light maintenance and repairs, washing and polishing, and sales of gasoline and oil. In early 1950, a new lessee named Leonard D. Salzberg took over Sutter-Larkin Garage. Like most other garage proprietors, Salzberg accepted hourly, daily, and monthly tenants and he offered a range of services, including washing and polishing, gasoline and oil sales, and light repairs.

In 1962, the building was leased to Halsted & Co., the funeral home located next door at 1123 Sutter Street. In April of that year, Halsted & Co. used the building to maintain and park its hearses, as well as to provide parking for its clients. Halsted & Co. did not occupy the entire building; Botta's Foreign Car Repair was also a tenant. The building also housed a small gas station operated at various times by Atlantic Richfield and Standard Oil Co. In 1972, Halsted & Co purchased the building, using a portion of the building for its funeral home business and leasing the rest to three separate auto service businesses.

From 1987 to present, the building has continued to function as a parking garage as well as supporting various other automotive-related businesses. By 1992, Halsted & Co. had relocated all of its public parking to a surface lot next to its mortuary and its hearse storage and maintenance facilities to a garage beneath the parking lot.

EVALUATION

The building at 1101 Sutter Street was previously evaluated as part of the Van Ness Automobile Row historic resources survey and was given a status code of 3CS, indicating it is individually eligible for listing in the California Register. The building was found to be eligible under Criterion 1 for its association with Heald's Business College's Engineering and Automobile School, an engineering and automobile school with a period of significance of 1920–1935. The building was also found to be eligible for its general automobile-related use as a school and garage with a period of significance extending to 1961. The building was most recently evaluated for National Register eligibility as part of the Federal Rehabilitation Tax Credit application. This application determined the building to be eligible for listing in the National Register under Criterion C as an excellent and well-preserved example of a commercial garage dating to the 1920s.²⁸

The planning department agrees with the previous evaluations from the Van Ness Automobile Row historic resources survey and the National Register eligibility form and finds the building to be individually eligible for listing in the California Register under criteria 1 and 3, with a period of significance extending from the building's construction in 1920 up until its last use as a public parking garage in 1961. With regard to the building's potential to contribute to the adjacent Lower Nob Hill Apartment Hotel Historic District, the city concurred with ARG's finding that the odd-numbered side of the block that includes the project site is not representative of the adjacent historic district's high concentration of apartment buildings constructed almost entirely between 1906 and 1925. The block containing the proposed project site includes an automobile garage (1101 Sutter Street), a

²⁸ San Francisco Planning Department, Part II Historic Resources Evaluation Response for 1101–1123 Sutter Street, November 2020.

funeral parlor with a surface parking lot (1123 Sutter Street), and a contemporary apartment building, all buildings which cannot be clearly associated with an apartment/hotel district.

BUILDING INTEGRITY

The former engineering and automobile school building at 1101 Sutter Street has undergone relatively few alterations in its almost a century of existence. The only notable alterations included the opening of the first-floor bays on Sutter Street in the 1950s to insert a small gas station, the replacement of two original wood vehicular doors with overhead roll-up doors in the 1990s, and the installation of metal security bars in front of several of the first-floor windows around the same time. Signage on the exterior has been changed periodically since 1935, but it is all easily reversible or removable.²⁹ Overall, the building retains sufficient integrity to convey its significance as an engineering and automobile school as well as a parking garage.

CHARACTER-DEFINING FEATURES

The character-defining features of this building are its height and massing; concrete and brick masonry construction; stucco finish scored to resemble stone masonry; molded cement plaster ornament, including spandrel panels and urns; sheet metal cornice; grid-like fenestration pattern; and divided-lite industrial sash windows.³⁰

1123 SUTTER STREET

BUILDING DESCRIPTION

The building at 1123 Sutter Street is a one-story-over-basement building with a partial mezzanine.³¹ The building comprises two older circa 1915 commercial structures, both of which are constructed of brick and concrete with a combination of steel and heavy timber framing. In 1926 the two structures were combined into one building and given a unified Sutter Street façade. The roof of the building is composed of several flat- and gable-roofed sections concealed behind a raised parapet. The interior contains three floor levels, including a basement, which contains storage, mechanical rooms, and a casket showroom. The first floor contains a reception area, two chapels, three suites of interconnected bereavement rooms, and several toilet rooms. The mezzanine contains business offices, embalming/preparation rooms, a break room, and toilet rooms. 1123 Sutter Street has undergone relatively few alterations since it was completed in 1926.

The primary façade of 1123 Sutter Street faces north. It is massed as a horizontal rectangle, seven bays wide, and articulated as an enframed window wall with the fenestration recessed back several feet from the sidewalk property line. The outer framing element is flush with the sidewalk and is embellished with a frieze consisting of a plaster swag motif and a flattish cornice/fascia embellished with an abstract, almost Art Deco, motif. Clad in either terra cotta or cast concrete, the enframing element is bounded along its inner sides by a Greek key molding and a repeating pattern of circular medallions. The frieze is supported by eight pairs of Doric columns. Entrances are located in the corner and center bays and consist of pairs of glazed, single-panel wood doors. Above the doors are metal *clathri* screens.³² Non-historic metal awnings extend out from the entrances above the sidewalk. Pairs of custom cast-iron street-light fixtures flank each of the entrances as well. The other four bays

²⁹ VerPlanck, C., *National Park Service Historic Preservation Certification Application Part I – Evaluation of Significance*, prepared by VerPlanck Historic Preservation Consulting, San Francisco, CA, 2019. Submitted to the California Office of Historic Preservation.

³⁰ San Francisco Planning Department, Part II Historic Resources Evaluation Response for 1101–1123 Sutter Street, November 2020.

³¹ ARG, *1123 Sutter Street Historic Resource Evaluation*, prepared for Martin Building Company, November 4, 2019.

³² *Clathri* refers to lattice-like screening made of wooden or iron bars.

contain pairs of wood casement windows and planter boxes at the first-floor level and metal clathri screens at the mezzanine level.

The west façade, which faces the parking lot, is entirely utilitarian. Finished in stucco over brick, the west façade is almost entirely concealed behind a heavy growth of vines. The rear section, which is kept free of vines, is simply articulated by a louvered vent and a pair of wood casement windows.

The south façade, which faces Hemlock Street, is clad in exposed brick laid in American common bond. Based on the south façade's fenestration pattern, as well as a visible seam, it is clear that the building was assembled from two structures. Entirely utilitarian, the south façade is articulated by an asymmetrical arrangement of door and window openings, most of which have been bricked in for security and seismic strengthening. At the lower part (basement level), there are three freight bays that have been partially infilled with brick; all are protected behind metal security bars. At the first-floor level are several windows that have been enclosed within metal flanges with security bars. At the mezzanine level is a pair of large double-hung wood windows at the far west end. Metal exhaust stacks and plumbing vents are attached all across the south façade.

BUILDING HISTORY

The original buildings on the current site appear to have been demolished in the 1906 earthquake, followed by two buildings constructed circa 1915. In 1925, William A. Halsted of Halsted & Co. acquired the site and engaged architect August Nordin to remodel two one-story (with basement) buildings (1119–1129 Sutter Street) into one building with a mezzanine for use as an undertaking establishment. The new mortuary was established at 1123 Sutter Street by 1926. In 1950, the property was still in use as an undertaking business, and a one-story private garage was added at the rear of the parking area to the west of the building. The garage was constructed of fireproof materials, with reinforced-concrete walls and concrete columns. Aside from the construction of the one-story garage (over basement) adjacent to the main building in 1950, 1123 Sutter Street has undergone only minor modifications since it was remodeled for use as a mortuary in 1926.³³

EVALUATION

The building at 1123 Sutter is individually eligible for listing in the California Register under criteria 1, 2, and 3. The building is significant under Criterion 1 for its association with Halsted & Co., one of the earliest and most prominent funeral establishments in San Francisco. The building is also significant under Criterion 2 for its association with William A. Halsted, a prominent representative of the undertaking profession and a foremost citizen who occupied a place of honor among San Francisco's funeral establishments. Finally, the building is significant under Criterion 3 as an early 20th century mortuary designed in the Classical Revival style by master architect August Nordin. The building has a period of significance of 1926–1930, which reflects the span from when it was rehabilitated by August Nordin for use as a mortuary by Halsted & Co. to the death of William A. Halsted, the firm's founder.³⁴ The building was not recommended as a contributor to the adjacent historic district, because the historic use of the building and its type is not compatible with the significance of the district.³⁵

BUILDING INTEGRITY

The building at 1123 Sutter Street retains all 7 aspects of integrity. 1123 Sutter Street has not been moved and retains integrity of location. The building has been minimally altered over time and retains integrity of design,

³³ ARG, *1123 Sutter Street Historic Resource Evaluation*, prepared for Martin Building Company, November 3, 2019.

³⁴ San Francisco Planning Department, Part II Historic Resources Evaluation Response for 1101–1123 Sutter Street, November 2020.

³⁵ ARG, *1123 Sutter Street Historic Resource Evaluation*, prepared for Martin Building Company, November 3, 2019.

materials, and workmanship. The built environment surrounding 1123 Sutter Street retains a high concentration of early 20th century buildings, including nearby contributors to the adjacent historic district; as such, the building retains integrity of setting and feeling. Although William A. Halsted passed away in 1930, the funeral business continued under his name until 2019 and the property maintains integrity of association. Therefore, the building at 1123 Sutter Street retains sufficient integrity to convey its significance as a mortuary establishment run by Halsted & Co., its association with William A. Halsted himself, and as an early 20th century mortuary designed by master architect August Nordin.

CHARACTER-DEFINING FEATURES

The character-defining features of this building include its one-story-with-mezzanine height; simple rectangular form and massing; its primary façade (including: seven-bay symmetrical arrangement of two side entrances and one center entrance separated by two fenestration bays; recessed fenestration and entryways; custom cast-iron street-light fixtures at each entrance along Sutter Street; and pairs of wood casement windows and planter boxes); its Classical Revival style on the primary façade (including: eight pairs of Doric columns; plaster ornament in swag motif and circular medallions with geometric Greek key molding; and metal clathri screens); and its first-floor interior spaces (including: reception area including rotunda and main corridor; west and east chapels; and three suites of interconnected bereavement rooms).³⁶

B. HISTORIC ARCHITECTURAL RESOURCES IN THE VICINITY

Known historic resources in the project vicinity include historic districts as described below. Historic district resources identified in an adopted local register of historical resources under CEQA Guidelines section 15064.5(a)(2) – as these nearby buildings and historic districts are – are considered historical resources under CEQA.

The project site is located on the south side of Sutter Street between Polk and Larkin streets in the Downtown/Civic Center neighborhood. The surrounding neighborhood consists of three- to six-story brick-and-concrete mixed-use buildings with commercial on the ground floor and apartments or residential hotel rooms on the upper floors. To the north and south of the project site is the National Register-listed Lower Nob Hill Apartment Hotel Historic District. North of the project site are three contributing multi-unit apartment buildings: 1114, 1122, and 1136 Sutter Street (Glen Arm Apartments). The entire block south of the project site, which is bounded by Hemlock and Post streets (to the north and south) and Polk and Larkin streets (to the west and east), is within the boundaries of the historic district.

HISTORIC DISTRICTS

As described previously, there is one National Register-listed historic district in the project vicinity – the Lower Nob Hill Apartment Hotel Historic District, which is adjacent to the project site. A brief description of this historic district is provided as follows.

The project site is adjacent to the western boundary of the National Register-listed historic district, which is characterized by three- to seven-story multi-unit residential buildings, most of which were constructed between 1906 and 1925. Listed in 1991, the district contains approximately 296 contributing and 35 non-contributing properties.³⁷ The district encompasses seven whole blocks and several partial blocks on the south slope of Nob

³⁶ San Francisco Planning Department, Part II Historic Resources Evaluation Response for 1101–1123 Sutter Street, November 2020.

³⁷ VerPlanck, C., *National Park Service Historic Preservation Certification Application Part I – Evaluation of Significance*, prepared by VerPlanck Historic Preservation Consulting, San Francisco, CA, 2019. Submitted to the California Office of Historic Preservation.

Hill within the area roughly bounded by Pine Street to the north, Stockton Street to the east, Geary Street to the south, and Polk Street to the west. According to the historic district's National Register nomination form:

*The Lower Nob Hill Apartment Hotel Historic District is significant under Criterion C as a very large, virtually intact, architecturally consistent, densely packed inner-city residential area hardly matched anywhere in California . . . It is [also] significant under Criterion A as the intense concentration of the dwellings of great numbers of persons, many of them white collar workers in the city's retail and financial centers, which were the largest and most important in all of California during most of the period of significance. The context for both kinds of significance is multiple unit residential buildings in California, 1870-1940.*³⁸

The district's period of significance is from 1906, when the 1906 Earthquake and subsequent fire obliterated much of the area, to 1940, an arbitrary date 50 years prior to the nomination's submission, so selected because the district's social significance continues into the present. Significant dates within the 1906–1940 period include 1906, the date of the earthquake and fire, and 1915, the year of the Panama-Pacific International Exposition in San Francisco, for which many of the district's buildings were constructed.³⁹

The character-defining features of the historic district include a *Sullivan-esque* composition with regard to the proportion of wall to windows, flat roofs, projecting cornices, and placement of ornamentation;⁴⁰ Classical ornamentation; parapets with heavily molded, galvanized-iron cornices; fire escapes; and slightly projecting bay windows. Cladding types include stucco and brick, or a combination thereof, and decorative detailing appears in marble, terra cotta, and tile accents.⁴¹

3.B.4 Impacts and Mitigation Measures

This section describes the impact analysis related to historic architectural resources for the proposed project. It describes the significance thresholds and the methods used to determine the impacts of the proposed project 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.

A. SIGNIFICANCE THRESHOLDS

Thresholds 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 purposes of this analysis, the following applicable threshold was used to determine whether implementation of the project would result in a significant historic architectural resources impact. Implementation of the proposed project would have a significant effect on historic architectural resources if the project would:

³⁸ U.S. Department of the Interior, National Park Service, *National Register of Historic Places Registration Form for the Lower Nob Hill Apartment Hotel District*, June 26, 1991.

³⁹ ARG, *1123 Sutter Street Historic Resource Evaluation*, prepared for Martin Building Company, November 4, 2019.

⁴⁰ The style was initiated by Louis Sullivan, a prominent turn-of-the-century architect and applies principles of Classical design to the new steel-framed skyscrapers arising in the 1890s. The style involves the use of ornament and design to delineate a tall building into three distinct parts – an entry level, a mid-section, and a top.

⁴¹ ARG, *1123 Sutter Street Historic Resource Evaluation*, prepared for Martin Building Company, November 4, 2019.

- Cause a substantial adverse change in the significance of a historical resource as defined in Public Resources Code section 21084.1 and CEQA Guidelines section 15064.5, including those resources listed in Article 10 or Article 11 of the San Francisco Planning Code,

CEQA Guidelines section 15064.5(b) establishes the criteria for assessing a significant environmental impact on historical resources. It states that a “project with an effect that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment.” The CEQA Guidelines section 15064.5(b)(1) defines “substantial adverse change in the significance of an historical resource” as a “physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired.” Per CEQA Guidelines section 15064.5(b)(2), the significance of a historic architectural resource is considered to be “materially impaired” when a project demolishes or materially alters in an adverse manner the physical characteristics that justify the inclusion of the resource in the California Register, or that justify the inclusion of the resource in a local register, or that justify its eligibility for inclusion in the California Register as determined by the lead agency for the purposes of CEQA.⁴²

B. 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 of the Interior’s Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings generally shall be considered to have mitigated impacts on a historical resource to a level below significance.⁴³ 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 California Register 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.

The analysis below summarizes the findings of the ARG 2019 report and historic resource evaluation responses parts I and II prepared by the planning department.

C. IMPACT EVALUATION

This section analyzes the proposed project’s impacts to historic architectural resources.

⁴² 14 CCR 15000–15387 and Appendices A–N, Guidelines for Implementation of the California Environmental Quality Act, as amended.

⁴³ 14 CCR 15000–15387 and Appendices A–N, Guidelines for Implementation of the California Environmental Quality Act, as amended.

Impact CR-1: The proposed rehabilitation of the existing 1101 Sutter Street building would not cause a substantial adverse change to an individual historic architectural resource. (Less than Significant)

As previously discussed, 1101 Sutter Street is a historical resource eligible for listing in the California Register under Criterion 1 for its association with Heald's Business College's Engineering and Automobile School, an engineering and automobile school with a period of significance of 1920–1935, and under Criterion 3 as an excellent and well-preserved example of a commercial garage dating to the 1920s. As noted in the project description, the project sponsor proposes to rehabilitate 1101 Sutter Street in conformance with the Secretary's Standards and is seeking Federal Rehabilitation Tax Credits for the rehabilitation, which is currently under review by the National Park Service.⁴⁴

The building would be rehabilitated with compatible new uses: it would become a mixed-use residential building with approximately 2,187 square feet of ground-floor commercial uses and 21 residential units on the ground, second, and third floors. The existing partially below-grade garage would provide 28 vehicle parking spaces and 24 bicycle parking spaces.

Conversion of the existing parking garage building into a residential building would require minimal changes to its distinctive materials, features, spaces, and spatial relationships and the historic character of the property would be rehabilitated in conformance with the Secretary's Standards. Rehabilitation is defined as "the act or process of making possible a compatible use for a property through repair, alterations, and additions while preserving those portions or features which convey its historical, cultural, or architectural values."⁴⁵ The details of the proposed rehabilitation were provided to the National Park Service as part of the historic preservation certification application to obtain Federal Rehabilitation Tax Credits for 1101 Sutter Street and were reviewed by planning department preservation staff.^{46, 47} The building would be rehabilitated for a compatible new use in a manner consistent with the Secretary's Standards such that distinctive materials, features, and finishes would be preserved and deteriorated materials would be repaired rather than replaced. Therefore, the planning department determined that rehabilitation of the building at 1101 Sutter Street would be completed in accordance with the Secretary's Standards.⁴⁸ According to CEQA Guidelines section 15064.5(b)(3), a project that follows the Secretary's Standards shall be considered as mitigated to a less-than-significant impact on the historical resource.⁴⁹ Therefore, the rehabilitation of 1101 Sutter Street would result in a less-than-significant impact under CEQA, with no mitigation required.

Impact CR-2: The proposed demolition of the existing 1123 Sutter Street building would have a substantial adverse effect on an individual historic architectural resource. (Significant and Unavoidable with Mitigation)

The proposed project would require the demolition of 1123 Sutter Street. As discussed above, 1123 Sutter Street is an individual historical resource eligible for listing in the California Register under criteria 1, 2, and 3. The

⁴⁴ Weeks and Grimmer, *The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring & Reconstructing Historic Buildings*, National Park Service, Technical Preservation Services, Washington, DC, 1995 (revised by A. Grimmer 2017).

⁴⁵ Weeks and Grimmer, *The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring & Reconstructing Historic Buildings*, p. 75, National Park Service, Technical Preservation Services, Washington, DC, 1995 (revised by A. Grimmer 2017).

⁴⁶ VerPlanck, C., *National Park Service Historic Preservation Certification Application Part I – Evaluation of Significance*, prepared by VerPlanck Historic Preservation Consulting, San Francisco, CA, 2019. Submitted to the California Office of Historic Preservation.

⁴⁷ VerPlanck, C., *National Park Service Historic Preservation Certification Application Part 2 – Description of Rehabilitation*, prepared by VerPlanck Historic Preservation Consulting, San Francisco, CA, 2019. Submitted to the California Office of Historic Preservation.

⁴⁸ San Francisco Planning Department, Part II Historic Resources Evaluation Response for 1101–1123 Sutter Street, November 2020.

⁴⁹ 14 CCR 15000–15387 and Appendices A–N, Guidelines for Implementation of the California Environmental Quality Act, as amended.

building is significant under Criterion 1 for its association with Halsted & Co., one of the earliest and most prominent funeral establishments in San Francisco. The building is also significant under Criterion 2 for its association with William A. Halsted, a prominent representative of the undertaking profession and a foremost citizen who occupied a place of honor among San Francisco's funeral establishments. Finally, the building is significant under Criterion 3 as an early 20th century mortuary designed in the Classical Revival style by master architect August Nordin. The building has a period of significance of 1926–1930, which reflects the span from when it was rehabilitated by August Nordin for use as a mortuary by Halsted & Co. to the death of Halsted, the firm's founder. Demolition of 1123 Sutter Street would materially impair the significance of the resource and would therefore cause a substantial adverse change to the individual historical resource, which is considered a significant impact under CEQA.

Implementation of Mitigation Measures M-CR-2a: Historical Documentation; M-CR-2b: Interpretation; and M-CR-2c: Historical Architectural Salvage, would lessen the impact of the proposed demolition of the historical resource at 1123 Sutter Street.

Mitigation Measure M-CR-2a: Historical Documentation. Prior to the issuance of demolition permits, the project sponsor shall undertake Historic American Building Survey (HABS)-level documentation of the subject property, structures, objects, materials, and landscaping. The documentation shall be funded by the project sponsor and 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 professional overseeing the documentation shall meet with San Francisco Planning Department staff for review and approval of a coordinated documentation plan before work on any one aspect may commence. The documentation shall consist of the following:

- **Measured Drawings:** A set of measured drawings that depict the existing size, scale, and dimension of the subject property. 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.
- **HABS-Level Photography:** Digital photographs of the interior and the exterior of the subject property. 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 current National Park Service standards. The photography shall be undertaken by a qualified professional with demonstrated experience in HABS photography.
- **HABS Historical Report:** A written historical narrative and report, per the HABS Historical Report Guidelines.
- **Video Recordation of the Historic Resource:** Digital video recordation shall be undertaken prior to the issuance of demolition or site permits. The project sponsor shall undertake video documentation of the affected historic resource and its setting. The video recordation will be scoped with and approved by planning department preservation staff prior to issuance of a site permit. The documentation shall be conducted and narrated by a qualified professional who meets the standards for history, architectural history, or architecture (as appropriate) set forth by the Secretary's qualification standards (36 CFR, part 61). The documentation shall include as much

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Environmental Setting, Impacts, and Mitigation Measures

3.B. Historical Architectural Resources

information as possible – using visuals in combination with narration – about the materials, construction methods, current condition, historic use, and historic context of the historic resource.

The professional(s) shall prepare the documentation and the planning department shall monitor its preparation. The professional(s) shall submit the completed documentation for review and approval by the planning department preservation staff before issuance of building permits. The final approved documentation shall be provided to the planning department and offered to repositories including, but not limited to: the San Francisco Public Library; the Environmental Design Library at the University of California, Berkeley; the California Historical Resources Information System Northwest Information Center; San Francisco Architectural Heritage; and the California Historical Society. Further, a softcover book shall be produced that includes the content from the historical report, historical photographs, HABS photography, and measured drawings. The book shall be made available to the public for distribution.

Mitigation Measure M-CR-2b: Interpretation. The project sponsor shall facilitate the development of an interpretive program focused on the history of the project site. The interpretive program should be developed and implemented by a qualified professional with demonstrated experience in displaying information and graphics to the public in a visually interesting manner, such as a museum or exhibit curator. As feasible, coordination with local artists should occur. The primary goal of the program is to educate visitors and future residents about the property's historical themes, associations, and lost contributing features within broader historical, social, and physical landscape contexts. These themes would include but not be limited to the subject property's historic significance as Halsted & Co.

An outline for the interpretative program shall be prepared for review and approval by planning department staff. The outline will lay out the various components of the interpretive program that shall be developed in consultation with an architectural historian who meets the Secretary of the Interior's Professional Qualification Standards, and approved by planning department staff prior to issuance of a site permit or demolition permit.

The interpretative program may include but not be limited to the installation of permanent on-site interpretive displays or development of digital/virtual interpretive products. All interpretative material shall be publicly available. For physical interpretation the plan shall include the proposed format and accessible location of the interpretive content, as well as high-quality graphics and written narratives. The interpretative plan should also explore contributing to digital platforms that are publicly accessible, such as the History Pin website or phone applications. Interpretive material could include elements such as virtual museums and content, such as oral history, brochures, and websites.

The detailed content, media and other characteristics of such interpretive program shall be approved by Planning Department Preservation staff prior to issuance of a Temporary Certificate of Occupancy.

Mitigation Measure M-CR-2c: Historical Architectural Salvage. Prior to the issuance of demolition permits that would remove character-defining features as part of construction of the proposed project, 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. The project sponsor shall prepare a salvage plan for review and approval by planning department staff prior to issuance of any site demolition permit.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

Mitigation Measures M-CR-2a, 2b, and 2c would be required in order to document and interpret the significance of 1123 Sutter Street for the public. These mitigation measures would create a collection of preservation materials that would be available to the public and inform future research. The mitigation would partially compensate for impacts associated with the proposed project through comprehensive documentation and memorialization of the resource. However, these measures would not be enough to avoid, rectify, reduce, or compensate for the loss of the building at 1123 Sutter Street. Because adverse change would still occur, the impact would be significant and unavoidable after application of mitigation.

Impact CR-3: The construction of the proposed new building on the project site would not have a substantial adverse effect on individual historical resources or offsite historic districts. (Less than Significant)

The increase in height adjacent to existing historical resources has the potential to bring significant changes to a historical resource's setting, thereby potentially compromising the integrity of the resource. In order to determine significant changes to the integrity of a historical resource's location and context it is important to understand the specific setting and context in question. The setting of 1101 Sutter is in the dense urban fabric of the Upper Tenderloin neighborhood that features a wide variety in the height and bulk of individual buildings. The wide variety of height and bulk of buildings in the subject project's vicinity would be considered part of the character of the neighborhood. As an example of this variation in height are two buildings across the street from the subject property at the southeast corner of Sutter and Larkin streets. On the southeast corner of Sutter and Larkin streets is the 2-story Portola Apartments at 1048 Sutter Street, while immediately adjacent is The Hotel Carlton at 1075 Sutter Street, a 9-story brick-clad Renaissance Revival hotel building. A 7-story change in height from one building to the next is common in this neighborhood and demonstrates the new construction of a 14-story tower next to the existing 3-story parking garage 1101 Sutter Street would not impact this historic resource's setting because it is located in a neighborhood where disparate heights and bulks from one building to the next are common. Additionally, the significance of 1101 Sutter Street is as the Heald's Engineering Automotive and Engineering School and as a commercial garage that has no significant association with the adjacent funeral home at 1123 Sutter Street, or the neighboring apartment/hotel buildings that contribute to the Lower Nob Hill Apartment Hotel historic district. Therefore, the new construction adjacent to 1101 Sutter Street would not interrupt any connection between this building and the surrounding historical resources.

One historic district is located in the project vicinity – the Lower Nob Hill Apartment Hotel Historic District. The existing buildings on the project site are not considered contributors to the district; therefore, the proposed project would not directly affect this resource. However, the construction of the proposed new building may indirectly affect the district by altering the existing visual setting of these offsite historical resources. The following analysis examines the proposed project's compatibility with and indirect impact to the adjacent historic district.

Although the proposed project is surrounded on three sides by the National Register-listed historic district, the size and scale of the new construction would not have indirect impacts on the setting of the district. The historic district is characterized almost exclusively by three- to seven-story residential buildings that fill their front lot lines and share a single stylistic orientation. The proposed project would be across the street from the historic district and would involve rehabilitation of 1101 Sutter Street and construction of a new mixed-use residential building (1123 Sutter Street) that would be 14 stories tall (up to 150 feet in height) and with no setbacks. Although the new construction would be taller than the contributing buildings within the historic district, the

overall massing and scale of the proposed building would be compatible with the dense urban character that defines the neighborhood, as discussed above, and the proposed project would not have an indirect impact on the district. Therefore, the proposed project would not impact the ability of the historic district to convey its historical significance.

Construction activities on the project site may result in varying degrees of temporary ground vibration, depending on the specific construction equipment used and operations involved. For the potential for continuous/frequent intermittent vibration to result in damage to structures, Caltrans indicates a threshold of 0.25 inches per second (in/sec) peak particle velocity (PPV) for “historic and some old buildings”. Project-generated groundborne noise and vibration levels at nearby sensitive receptors that are historic structures (including 1101 Sutter Street) are not predicted to exceed the Caltrans recommended damage criteria of 0.25 in/sec PPV for the potential to damage “historic and some older buildings”. At these locations, and in other surrounding areas where vibration would not be expected to cause cosmetic damage, vibration levels may still be perceptible. However, as with any type of construction, perceptible vibration would be anticipated.⁵⁰ See the discussion in the Initial Study under section E6, Noise starting on p. 46.

Therefore, implementation of the proposed project would not have a substantial adverse change on an offsite individual historic architectural resource or historic district. The proposed project would have a less-than-significant impact on offsite historic architectural resources, and no mitigation measures are required.

D. CUMULATIVE IMPACTS

Impact C-CR-1: The proposed project, in combination with other reasonably foreseeable projects, would not result in a significant cumulative impact on historic architectural resources. (Less than Significant)

The geographic scope for cumulative impacts to historic architectural resources includes the project site and adjacent properties, because construction on properties adjacent to a historic architectural resource may sometimes generate vibration that could damage the resource. In some cases, historic architectural resources are part of historic districts, so impacts can extend beyond the project site and adjacent properties into the rest of the district. Cumulative projects considered in this analysis are presented in the initial study (see Appendix A of this EIR) in Table 1, p. 14, and are shown on Figure 1, p. 16, of the initial study and also provided in Table 3-1, above.

The buildings on the project site are individually-eligible historical resources and do not contribute to any historic districts. In addition, there are no immediately adjacent historic resources, and as described in Section E.6, Noise, of the initial study (p. 47), construction would not result in vibration impacts to historical resources that are located across the street from the project site. Vibration effects are highly localized, and vibration attenuates rapidly from the source. Therefore, vibration impacts attributable to vibration generating activities generally would be limited to buildings and structures adjacent to the project site.⁵¹

⁵⁰ Dudek. *Environmental Noise and Vibration Assessment for the 1101-1123 Sutter Street Project (Case No. 2019-022850ENV)*, City of San Francisco, California. 2021. Submitted to the City of San Francisco Planning Department.

⁵¹ Dudek. *Environmental Noise and Vibration Assessment for the 1101-1123 Sutter Street Project (Case No. 2019-022850ENV)*, City of San Francisco, California. 2021. Submitted to the City of San Francisco Planning Department.

While several of the cumulative projects would entail the demolition of existing structures and historical resources may be adversely affected, the impacts of the cumulative projects would not combine with the impacts of the proposed project related to historic architectural resources to result in a significant cumulative impact because the adverse impacts to the historic resources on the project site are limited to the individually-eligible resource at 1123 Sutter Street. Therefore, the proposed project, in combination with other reasonably foreseeable future projects, would not result in a significant cumulative impact to historic architectural resources and cumulative impacts would be less than significant.

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Chapter 4

Other CEQA Issues

This chapter addresses the growth-inducement potential, significant environmental effects that cannot be avoided, and significant irreversible changes of the proposed 1101–1123 Sutter Street project (proposed project), as well as areas of controversy and issues to be resolved.

4.A Growth-Inducing Impacts

This section analyzes the growth-inducement potential of the proposed project, as required by the California Environmental Quality Act (CEQA). CEQA Guidelines section 15126.2(d) requires that an environmental impact report (EIR) evaluate the growth-inducing impacts of a project. A project is considered growth inducing if it would directly or indirectly foster substantial economic or population growth, or the construction of substantial amounts 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 project-specific demand or development of new residential subdivisions in areas that are sparsely developed or undeveloped. The environmental effects of project-induced growth are considered secondary or indirect impacts of the project. Growth can result in a variety of indirect environmental impacts, including increased demand on community services and public service infrastructure; increased traffic and noise; and degradation of air and water quality.

Assessing the growth-inducement potential of the proposed project involves determining whether or not construction of the project would remove an obstacle to population growth, and therefore directly or indirectly support more economic or population growth or residential construction in the surrounding environment, beyond that anticipated in planning documents.

The project site is located on an infill site, surrounded by urban uses; it would not result in the extension of infrastructure into undeveloped areas or the construction of a residential project in an area that is undeveloped. The proposed project would result in an incremental increase in population in the project area by replacing approximately 51,596 square feet of commercial uses on the site with approximately 177,306 gross square feet of residential uses (221 new dwelling units) and approximately 8,330 gross square feet of commercial and childcare uses. The proposed project is anticipated to have approximately 504 new residents and approximately 31 employees. As further described in Section E.2, Population and Housing, of the project's initial study (see Appendix A to this EIR), this growth would be consistent with applicable plans and policies for the area, including the San Francisco General Plan and the Association of Bay Area Governments' "Projections 2040" (a statistical compendium of demographic, economic, and land use changes in coming decades).

The proposed project would provide for high-density residential growth supported by existing facilities, and would not require expansion of existing infrastructure, public services, community facilities, public services, or public utilities. Although this growth might have otherwise occurred at other Bay Area locations, the proposed project would focus growth on an underused infill site that is near transit, employment areas, and public amenities.

Therefore, implementation of the proposed project, which would result in an incremental increase in population consistent with growth already envisioned in regional, local, and area plans, would not have a direct or indirect growth-inducing impact.

4.B Significant Unavoidable Impacts

In accordance with section 21067 of CEQA and sections 15126(b) and 15126.2(b) of the CEQA Guidelines, the purpose of this section is to identify project-related environmental impacts that could not be eliminated or reduced to a less-than-significant level with the implementation of all identified mitigation measures. The findings in this chapter are subject to final determination by the San Francisco Planning Commission as part of its certification of this EIR.

As described in Section 3.B, Historic Architectural Resources, of this EIR, under Impact CR-2, the proposed project would demolish 1123 Sutter Street, an individual historical resource eligible for listing on the California Register of Historical Resources and a CEQA historical resource. Demolition of 1123 Sutter Street would materially impair the significance of the resource and would therefore cause a substantial adverse change to the individual historical resource, which is considered a significant impact under CEQA. Implementation of Mitigation Measures M-CR-2a: Historical Documentation; M-CR-2b: Interpretation; and M-CR-2c: Historical Architectural Salvage, pp. 3-21 and 3-22, would lessen the impact of the proposed demolition of the historical resource at 1123 Sutter Street. However, even with implementation of these mitigation measures, the impact to this historic architectural resource would remain significant and unavoidable. 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.

4.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 nonrenewable 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 ensure 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.18, Energy Resources, p. 131 of the initial study (see Appendix A), consumption of nonrenewable energy would occur during the approximately 30-month construction period and during the operational phase of the proposed project. Construction-related energy use would be temporary, and compared to projects in other states and the country as a whole, construction projects in California and in the Bay Area use the most energy-efficient equipment available to meet state and local goals for criteria air pollutant and greenhouse gas emissions reductions. As a result, construction activities would not have a measurable effect on regional energy supplies or on peak energy demand and would not result in inefficient or wasteful use of fuel or energy. During

4.D. Areas of Known Controversy and Issues to Be Resolved

operations, compliance with state building code energy conservation standards would ensure that the proposed project would not have a measurable effect on regional energy supplies or on peak energy demand. The proposed project would also be consistent with the City and County of San Francisco's greenhouse gas reduction strategy. In addition, as discussed in Section E.5, Transportation and Circulation, p. 30 of the initial study, the project site is in a transit-rich area that has relatively low vehicle miles traveled per capita compared to the rest of the Bay Area. Therefore, implementation of the proposed project would not lead to a wasteful use of fuel.

As discussed in "No Impact or Not Applicable Environmental Topics," p. 11 of the initial study, the project site is within an urbanized area in the city that is not zoned for agricultural uses and does not contain any prime farmland, unique farmland, farmland of statewide importance, forest land, or land under a Williamson Act contract. 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; therefore, development of the proposed project would not result in the loss of access to mining reserves.

Therefore, the proposed project 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. 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.17, Hazards and Hazardous Materials, pp. 122-123 of the initial study). 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.

4.D Areas of Known Controversy and Issues to Be Resolved

Publication of the notice of preparation of an EIR initiated a 30-day public review and comment period that began on December 17, 2020 and ended on January 22, 2021 (see Appendix B). During the review and comment period, a total of three commenters submitted letters to the planning department. The Native American Heritage Commission commented on Assembly Bill 52 tribal cultural resources notification and consultation requirements. Other commenters on the notice of preparation commented on impacts to the adjacent buildings, including construction noise and debris control; access to sunlight and views; and project merits. The planning department has considered the comments made by the public in preparation of the initial study and draft EIR for the proposed project. There are no known areas of controversy or issues to be resolved.

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Chapter 5

Alternatives

5.A Introduction

This chapter describes and evaluates the four alternatives to the proposed 1101–1123 Sutter Street project (proposed project), including the No Project Alternative, Full Preservation Alternative, Partial Preservation Alternative 1, and Partial Preservation Alternative 2; analyzes the impacts to historic architectural resources for each alternative; analyzes the impacts to other topics; and describes the environmentally superior alternative. Alternatives considered but rejected from further consideration are also described.

The California Environmental Quality Act (CEQA) Guidelines section 15126.6(a) states that an environmental impact report (EIR) must describe and evaluate a reasonable range of alternatives to the proposed project that would feasibly attain most of the project’s basic objectives and would avoid or substantially lessen any significant adverse environmental effects of the project. An EIR need not consider every conceivable alternative to the proposed project. Rather, it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. The EIR must evaluate the comparative merits of the alternatives and include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project.

Specifically, the CEQA Guidelines set forth the following criteria for selecting alternatives¹:

- **Identifying Alternatives.** The discussion of alternatives shall focus on alternatives to the project or its location that are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives or would be more costly (CEQA Guidelines section 15126.6[b]).
- **Range of Alternatives.** The range of potential alternatives shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects (CEQA Guidelines section 15126.6[c]). The specific alternative of “No Project” (referred to as the No Project Alternative) shall also be evaluated along with its impacts (CEQA Guidelines section 15126.6[e][1]).
- **Evaluation of Alternatives.** The alternatives should be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project. The range of feasible alternatives shall be selected and discussed so as to foster meaningful public participation and informed decision-making (CEQA Guidelines section 15126.6[f]). An EIR is not required to consider alternatives that are infeasible (CEQA Guidelines section 15126.6[a]).

¹ 14 CCR 15000–15387 and Appendices A–N, Guidelines for Implementation of the California Environmental Quality Act, as amended. The CEQA Guidelines are available at: [https://govt.westlaw.com/calregs/Browse/Home/California/CaliforniaCodeofRegulations?guid=I95DAAA70D48811DEBC02831C6D6C108E&originationContext=documenttoc&transitionType=Default&contextData=\(sc.Default\)](https://govt.westlaw.com/calregs/Browse/Home/California/CaliforniaCodeofRegulations?guid=I95DAAA70D48811DEBC02831C6D6C108E&originationContext=documenttoc&transitionType=Default&contextData=(sc.Default)).
[https://govt.westlaw.com/calregs/Browse/Home/California/CaliforniaCodeofRegulations?guid=I95DAAA70D48811DEBC02831C6D6C108E&originationContext=documenttoc&transitionType=Default&contextData=\(sc.Default\)](https://govt.westlaw.com/calregs/Browse/Home/California/CaliforniaCodeofRegulations?guid=I95DAAA70D48811DEBC02831C6D6C108E&originationContext=documenttoc&transitionType=Default&contextData=(sc.Default)).

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Alternatives

5.B. Summary of Project Alternatives

As stated above, the intent of the alternatives analysis is to consider designs and development programs that could avoid or lessen significant and unavoidable impacts resulting from the proposed project. As identified in Section 3.B, Historic Architectural Resources, of this EIR, if implemented, the proposed project would result in a significant and unavoidable impact related to the demolition of 1123 Sutter Street, a historic resource under CEQA (see Impact CR-2 on p. 3-20). 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 initial study (see Appendix A to this EIR).

5.B Summary of Project Alternatives

Several alternatives and variations on the alternatives were considered for analysis in this EIR that would substantially reduce or avoid the significant unavoidable impact that was identified in this draft EIR. Many alternatives that were rejected were found to be infeasible or failed to meet the project sponsor's key project objectives and are described at the end of this chapter.

The four alternatives selected for detailed analysis in this EIR, including the No Project Alternative, represent a reasonable range of alternatives to the proposed project that would avoid or substantially lessen the significant adverse environmental impacts to historic architectural resources. These alternatives are as follows:

- No Project Alternative
- Full Preservation Alternative
- Partial Preservation Alternative 1
- Partial Preservation Alternative 2

The project sponsor; the project architects, David Baker Architects; and the historic preservation architects for the project, Architectural Resources Group (ARG), developed preservation alternatives for the proposed project in consultation with San Francisco Planning Department historic preservation staff. The screening process for identifying viable EIR alternatives included consideration of the following criteria: ability to meet the project objectives, including maximizing housing on the site; potential ability to substantially lessen or avoid significant environmental effects associated with the proposed project; and potential feasibility.

5.B.1 Alternatives Selection

A. PROJECT OBJECTIVES

As stated in Chapter 2, Project Description, the project sponsor's objectives for the proposed project are to:

- Develop a well-designed, financially feasible mixed-use project with residential housing units that contributes the following services to support the well-being of the community: new retail, restaurant, and commercial spaces for the benefit of neighborhood residents and businesses; and a childcare center for the benefit of both the project's and neighborhood's residents.
- Increase the supply of housing in the City and County of San Francisco, including affordable housing, in an area designated for higher density due to its proximity to downtown and accessibility to local and regional transit. Maximize housing on a site that currently has no housing and incorporate onsite affordable units.

- Create a more attractive, interesting, and engaging street-level experience for pedestrians, transit users, and future residents.
- Construct a single, cohesive development occupying the project site consisting of high-quality, contemporary urban design.
- Retain historic resources where it is economically and structurally feasible to rehabilitate the building's interior space for new commercial and residential uses.

During the development and selection process for the project alternatives, all potential alternatives were considered for their ability to meet the stated project objectives.

B. DEVELOPMENT OF ALTERNATIVES

Key issues and considerations in the development of the alternatives included the following:

- The process consisted of developing a range of schemes that would achieve either full or partial preservation of the two historic resources on the project site. The schemes had differing building heights and massing for the additions proposed to be constructed above the 1101 and 1123 Sutter Street buildings. Various setbacks up to 25 feet from the existing building façades were evaluated for the proposed additions above 1101 and 1123 Sutter Street to reduce potential impacts to the historic buildings. In addition, a tower with varying heights was proposed to be constructed on the surface parking lot of 1123 Sutter Street.
- In addition to historic preservation, a primary goal in the development of alternatives was to maximize the number of residential units on the site while avoiding potentially significant environmental impacts, primarily pertaining to wind and shadow, related to the increased building heights on the site. In order to maximize the number of residential units, the development of the alternatives took into account the height and bulk restrictions for each parcel.

Initial alternatives included building towers and additions with maximum heights of up to 150 feet, similar to the maximum height of the proposed project. After several initial schemes within this framework, taller alternatives were developed that further increased the building heights to 200 feet at the west side of 1123 Sutter Street in order to maximize housing. Three preservation alternatives were ultimately identified for presentation to the Historic Preservation Commission on February 3, 2021: a full preservation alternative and two partial preservation alternatives. The Full Preservation Alternative, Partial Preservation Alternative 1, and Partial Preservation Alternative 2B would each include a new 200-foot building on 1123 Sutter Street. However, a wind analysis conducted by RWDI for all three alternative schemes concluded that due to this height, wind speeds at several entrances along Sutter Street would likely exceed the comfort and hazard criteria, with Partial Preservation Alternative 2B creating the most severe wind conditions. RWDI recommended several design modifications such as planters, tall guardrails, and wind screens to achieve more favorable wind conditions. The intent in developing these alternatives was primarily to preserve the historical architectural resources at the site and to minimize impacting these resources to the extent possible while also meeting the objectives of the project to provide new residential units. Overall, the proposed alternatives reduced impacts compared to the proposed project on historic architectural resources, but would have increased wind impacts due to the 200-foot height of the tower designed to provide the required housing units. These alternatives were presented to the Historic Preservation Commission and modifications to the proposed alternatives were suggested in order to further reduce potential environmental impacts. The design of these alternatives went through a rigorous process attempting to balance the objectives of the project along with minimizing impacts to the historical

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5.B. Summary of Project Alternatives

architectural resources. Unfortunately, there was no design option available that accomplished all the project goals and did not create an increase in potential wind impacts as compared to the project.

C. HISTORIC PRESERVATION COMMISSION REVIEW AND COMMENT

Consistent both with Historic Preservation Commission resolution 0746 regarding evaluation of preservation alternatives in the EIR process and with planning department policy, the commission had the opportunity to provide early feedback on the draft alternatives. On February 3, 2021, planning department staff and the project sponsor presented the three draft preservation alternatives to the commission.² The commission generally found that the alternatives represented a reasonable range of alternatives for the EIR analysis, that with some revisions would meet objectives of avoiding or reducing the significant adverse effects of the proposed project on historic architectural resources. Some members of the Historic Preservation Commission found that Partial Preservation Alternative 2B was less successful in responding to the character-defining height and massing of the two historic resources on site. The Historic Preservation Commission encouraged modifications to the alternatives that would retain additional portions of the 1123 Sutter Street Mortuary building, including some of its interior spaces and existing openings to provide an active streetscape, and suggested modifying the additions to 1123 Sutter Street to reflect the architectural character of the building in all of the preservation alternatives. The commission also remarked on the unique architectural quality of the mortuary at 1123 Sutter Street.

In response to commission comments, exterior and interior modifications were made to the Full Preservation Alternative and Partial Preservation Alternative 1, and a new Partial Preservation Alternative 2 was developed to incorporate the retained elements of the façade and some interior spaces of 1123 Sutter Street, replacing the previous Partial Preservation Alternative 2B. The addition would display a fenestration pattern and would be clad in materials that respond to the character-defining features of 1123 Sutter Street. In addition, this revised alternative would avoid the significant wind impacts from the 200-foot-high tower on the western portion of the site by reducing the height of the tower to 150 feet, similar to the proposed project. With the building height limited to 150 feet, wind speeds for this alternative would be slightly more severe than the original design, but according to the RWDI wind analysis would remain appropriate for the intended use and would comply with the City's wind hazard criterion.

Along with the new Partial Preservation Alternative 2, this chapter analyzes the Full Preservation Alternative and Partial Preservation Alternative 1 originally presented to the commission with minor modifications to the building exterior and interior.

Table 5-1 provides a comparison of the alternative features and impact summary. The following discussion of historic resources impacts of the project alternatives is based on an analysis prepared by ARG that is included in Appendix D of this EIR.³ Table 5-2 provides a comparison of each alternative's ability to meet project objectives. Table 5-3 shows which character-defining features of 1101 and 1123 Sutter Street would be retained for each project alternative. Table 5-4 includes a comparison of historic architectural resources and wind impacts for each project alternative.

² San Francisco Historic Preservation Commission, *Memo From the Historic Preservation Commission Re Meeting Notes from Review and Comment at the February 3, 2021 HPC Hearing for Preservation Alternatives for 1011-1123 Sutter Street*, March 12, 2021.

³ ARG (Architectural Resources Group), *1101-1123 Sutter Street Preservation Alternatives Memorandum*, May 4, 2021. This document is included in the EIR as Appendix D.

Table 5-1 Comparison of Alternatives for CEQA Analysis

	Proposed Project	No Project Alternative (Existing Conditions)	Full Preservation Alternative	Partial Preservation Alternative 1	Partial Preservation Alternative 2
DESCRIPTION					
BUILDING HEIGHT/STORIES					
1101 Sutter Street	No change from existing	45 feet ^a Three stories plus partially below- grade garage	Same as project	85 feet 7 stories (existing building plus 4 additional levels, set back 20 feet along Sutter and Larkin streets)	Same as project
1123 Sutter Street, east side of parcel	150 feet ^a 14 stories	25 feet ^a 1 story with partial mezzanine plus partially below- grade garage	45 feet 3 stories (existing building plus 2-level addition, set back 25 feet along Sutter and Hemlock streets)	65 feet 5 stories (existing building plus 4- level addition, set back 25 feet along Sutter Street)	150 feet 14 stories (existing building plus 12 level addition, no setback)
1123 Sutter Street, west side of parcel		0 feet (surface parking lot)	200 feet/ 18 stories	200 feet/ 18 stories	150 feet/ 14 stories
RESIDENTIAL UNITS					
Number of Units	221	0	115	151	214
GROSS SQUARE FEET BY USE					
Residential	177,306	0	110,736	133,227	168,153
Common Amenities for Residents	12,201	0	3,378	3,378	3,378
Commercial	4,575	51,596	Same as project	Same as project	Same as project
Childcare	3,755	0	Same as project	Same as project	Same as project
Open Space	11,637	0	1,607	2,903	1,607
Garage/Vehicular and Bicycle Parking	15,125	Included in commercial	Same as project	Same as project	Same as project

SOURCE: David Baker Associates 2021.

NOTE:

^a Height above Sutter Street grade

Table 5-2 Comparison of Alternatives Ability to Meet Project Sponsor's Objectives

Objective/Alternative	Proposed Project	No Project	Full Preservation	Partial Preservation Alternative 1	Partial Preservation Alternative 2
Develop a well-designed, financially feasible mixed-use project with residential housing units that contributes the following services to support the well-being of the community: new retail, restaurant, and commercial spaces for the benefit of neighborhood residents and businesses; and a child care center for the benefit of both the project's and neighborhood's residents.	Meets	Does not meet	Partially meets. Would contribute services to the well-being of the community. However, there would be a 48% reduction in unit count from the proposed project	Partially meets. Would contribute services to the well-being of the community. However, there would be a 32% reduction in unit count from the proposed project	Partially meets. Would contribute services to the well-being of the community. However, there would be a 3% reduction in unit count from the proposed project
Increase the city's supply of housing, including affordable housing, in an area designated for higher density due to its proximity to downtown and accessibility to local and regional transit. Maximize housing on a site that currently has no housing and incorporate on-site affordable units.	Meets	Does not meet	Partially meets – 106 fewer units than proposed project	Partially meets - 70 fewer units than proposed project	Partially meets - 7 fewer units than proposed project
Create a more attractive, interesting and engaging street-level experience for pedestrians, transit users, and future residents.	Meets	Does not meet	Meets	Meets	Meets
Construct a single, cohesive development occupying the project site consisting of high-quality, contemporary urban design.	Meets	Does not meet	Meets	Meets	Meets

Objective/Alternative	Proposed Project	No Project	Full Preservation	Partial Preservation Alternative 1	Partial Preservation Alternative 2
Retain historic resources where it is economically and structurally feasible to rehabilitate the building's interior space for new commercial and residential uses.	Partially Meets (fully preserves 1101 Sutter and demolishes 1123 Sutter)	Does not meet	Meets (fully preserves 1101 Sutter and retains the majority of character-defining features and some interior spaces at 1123 Sutter)	Partially meets (retains façade-related character-defining features at both 1101 and 1123 Sutter and some interior spaces at 1123 Sutter, but 4-story additions at both buildings only partially retain height- and massing-related character-defining features)	Partially meets (fully preserves 1101 Sutter and retains façade-related character-defining features and some interior spaces at 1123 Sutter, but 12-story addition on top of 1123 Sutter does not retain height- and massing-related character-defining features)

SOURCE: ARG 2021.

Table 5-3 Comparison of Alternatives Retention of Character-Defining Features

Character-Defining Feature	Full Preservation Alternative			Partial Preservation Alternative 1			Partial Preservation Alternative 2		
	R ^a	PR ^b	NR ^c	R	PR	NR	R	PR	NR
1101 Sutter Street:									
Three-story height and massing	x				x		x		
Concrete and brick masonry construction	x			x			x		
Stucco finish scored to resemble stone masonry	x			x			x		
Molded cement plaster ornament, with spandrel panels & urns	x			x			x		
Sheet metal cornice	x			x			x		
Grid-like fenestration pattern	x			x			x		
Divided-lite "industrial" wood sash windows	x			x			x		
1123 Sutter Street:									
One-story-with-mezzanine height		x			x				x
Simple rectangular form and massing		x			x				x
Primary façade element: seven bay symmetrical arrangement; two side entrances and one center entrance separated by two fenestration bays	x			x			x		
Primary façade element: recessed fenestration and entryways	x			x			x		
Primary façade element: custom, cast iron street light fixtures at each entrance along Sutter Street	x			x			x		

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5.B. Summary of Project Alternatives

Character-Defining Feature	Full Preservation Alternative			Partial Preservation Alternative 1			Partial Preservation Alternative 2		
	R ^a	PR ^b	NR ^c	R	PR	NR	R	PR	NR
Primary façade element: pairs of wood casement windows and planter boxes	x			x			x		
Classical Revival style element: eight pairs of Doric columns	x			x			x		
Classical Revival style element: Plaster ornament in swag motif and circular medallions with geometric Greek key molding	x			x			x		
Metal clathri screens	x			x			x		
First floor interior element: reception area including rotunda and main corridor		x			x			x	
First floor interior element: west and east chapels			x			x			x
First floor interior element: three suites of interconnected bereavement rooms		x			x			x	

SOURCE: ARG 2021.

NOTES:

- ^a Retained
- ^b Partially Retained
- ^c Not Retained

Table 5-4 Comparison of Alternatives Historic Architectural Resources and Wind Impacts

Impact	Proposed Project	No Project	Full Preservation	Partial Preservation Alternative 1	Partial Preservation Alternative 2
HISTORIC ARCHITECTURAL RESOURCES					
Impact CR-1: 1101 Sutter Street	LTS	NI	LTS	SUM	LTS
Impact CR-2: 1123 Sutter Street	SUM	NI	LTS	SUM↓ ^a	SUM↓ ^a
Impact CR-3: Offsite Resources	LTS	NI	LTS	LTS	LTS
Impact C-CR-1: Cumulative	LTS	NI	LTS	LTS	LTS
WIND^c					
Impact WI-1: Wind Hazards	LTS	NI	SUM	SUM	LTS↑ ^b
Impact C-WI-1: Cumulative	LTS	NI	LTS	LTS	LTS↑ ^b

SOURCE: ARG 2021.

NOTES:

- ^a Significant and unavoidable impact with implementation of feasible mitigation but with less severity than the proposed project (↓)
- ^b Less-than-significant impact with implementation of feasible mitigation with an increase in severity than the proposed project (↑)
- ^c Evaluated in the initial study (see Appendix A).

LTS = less-than-significant impact, no mitigation required

NI = no impact

SUM = significant and unavoidable impact with implementation of feasible mitigation

N/A = not applicable

5.C No Project Alternative

5.C.1 Description

CEQA Guidelines section 15126.6(e)(3)(B) describes the “No Project” Alternative as the circumstance under which the proposed project does not proceed. Consideration of the No Project Alternative is required under section 15126(f) of the CEQA Guidelines. The purpose of describing and analyzing a No Project Alternative is to allow decision makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project, per CEQA Guidelines section 15126.6(e)(1).

Under the No Project Alternative, no changes would be made to the existing historic structures on the project site. The historic character-defining features of the parking garage at 1101 Sutter Street and the funeral home at 1123 Sutter Street would be retained; no modifications, repairs, or restoration activities would be conducted. No residential or childcare uses would be constructed on the site.

5.C.2 Impacts

The No Project Alternative would continue existing conditions on the project site. Under this alternative, the two existing buildings, both historic architectural resources, would not be rehabilitated or demolished. Therefore, the No Project Alternative would avoid the project’s significant unavoidable impact to historic architectural resources (Impact CR-2: NI; reduced).

5.C.3 Achievement of Project Objectives

The No Project Alternative would not achieve any of the project sponsor’s objectives listed in Section 2.E, Project Sponsor’s Objectives, of this EIR.

5.D Full Preservation Alternative

5.D.1 Description

Under the Full Preservation Alternative, 1101 Sutter Street would be retained and rehabilitated, similar to the proposed project; 1123 Sutter Street would be retained, a two-level addition would be constructed above the existing building, and the interior would be redeveloped; and an 18-story, 200-foot-tall residential tower would be constructed on the parking lot at the west side of the project site (on the existing surface parking lot; see Figure 5-1, Full Preservation Alternative).



SOURCE: David Baker Architects 2021

FIGURE 5-1

Full Preservation Alternative

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The overall size of the alternative would be smaller than the proposed project, with 115 dwelling units (approximately 110,736 gross square feet of residential uses), less amenity and open space, and the same amount of commercial, childcare, and garage uses as the proposed project.

Details about the buildings would be as follows:

- 1101 Sutter Street would remain as described for the proposed project at the exterior. The project proposes to rehabilitate the existing building with no additions or major changes to the building's design.
- 1123 Sutter Street would remain as in current conditions at the exterior, modified by the construction of a two-story addition. The addition would be set back 25 feet from both the north façade at Sutter Street and the south façade at Hemlock Street, with a maximum height of 45 feet, and its architectural design details, material palette, and fenestration pattern would generally reflect the color palate and pattern of fenestration of the primary façade of the existing historic building at 1123 Sutter Street. Interior demolition and new construction for adaptive reuse would partially retain and rehabilitate interior spaces including the lobby/waiting room and rotunda/main entry to a sufficient degree to provide a transition between the portion of the building that would be retained and new spaces behind. The west and east chapels, which are also interior character-defining features, would not be retained.
- The new residential tower on the existing surface parking lot would have architectural design details, material palette, and fenestration patterns that would be the same as or similar to those of the proposed project but would be 18 stories (200 feet in height) as opposed to the proposed project which would be 14 stories (150 feet in height).

The Full Preservation Alternative would minimally alter the façades, height, and massing of the existing buildings at the project site by locating the majority of new construction at the existing surface parking lot.

5.D.2 Impacts

Similar to the proposed project, 1101 Sutter Street would be retained and rehabilitated. Unlike the proposed project, the Full Preservation Alternative includes the retention of 1123 Sutter Street. In addition, the proposed new 200-foot-tall building on the existing surface parking lot would be similar in design to the proposed project.

Similar to the proposed project, the rehabilitation of 1101 Sutter Street in accordance with the Secretary of the Interior's Standards for the Treatment of Historic Properties would allow for the retention and reuse of the building and avoid any substantial adverse change to this individual historic architectural resource. The Full Preservation Alternative would retain all the character-defining features of 1101 Sutter Street. It would maintain the three street-facing façades of 1101 Sutter Street at Sutter, Larkin, and Hemlock streets. As such, all the character-defining features associated with fenestration, cladding, and façade details would be fully retained. The Full Preservation Alternative would fully retain the height and massing of 1101 Sutter Street. 1101 Sutter Street does not have any interior character-defining features; therefore, changes to the interior of the building would not affect the resource. Impacts under this alternative would be less than significant (**Impact CR-1: LTS; similar**).

The Full Preservation Alternative would retain many of the character-defining features of 1123 Sutter Street. The Full Preservation Alternative would maintain the primary (north) and rear (south) façades of 1123 Sutter Street. As such, all the character-defining features associated with fenestration, cladding, and façade details would be fully retained. The Full Preservation Alternative would include constructing a rectangular-plan addition atop 1123 Sutter Street that would be set back 25 feet from the north façade at Sutter Street and the south façade at

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5.D. Full Preservation Alternative

Hemlock Street, and as such would partially retain the character-defining features of that building relating to height and massing. The interior demolition and new construction for adaptive reuse would partially retain and rehabilitate interior spaces, and as such would partially retain the interior character-defining features of the building.

Overall, the new two-level addition to 1123 Sutter Street would not have significant adverse impacts on the historic resource's ability to convey its historic significance. Therefore, unlike the proposed project, the Full Preservation Alternative would not have a significant adverse impact to 1123 Sutter Street, and Project Mitigation Measures M-CR-2a: Historical Documentation; M-CR-2b: Interpretation; and M-CR-2c: Historical Architectural Salvage, identified for the proposed project, would not be applicable. Impacts under this alternative would be less than significant (**Impact CR-2: LTS; reduced**).

Similar to the proposed project, the Full Preservation Alternative would not materially alter offsite historic resources and would not have substantial adverse effects on the adjacent Lower Nob Hill Apartment Hotel Historic District. Impacts under this alternative would be less than significant (**Impact CR-3: LS; similar**). Also similar to the cumulative conditions under the proposed project, the Full Preservation Alternative, in combination with other cumulative projects, would not result in significant cumulative impacts. Therefore, potential cumulative impacts would be less than significant (**Impact C-CR-1: LTS; similar**).

However, unlike the proposed project, the proposed 200-foot-tower under this alternative has the potential to create significant wind impacts due to its location on the site and the substantially lower height of surrounding buildings. With the west tower height increased by 50 feet compared to the proposed project, wind conditions along adjacent sidewalks would be expected to be more severe than for the proposed project.⁴ The highest wind speeds are predicted downwind (east) of the project site, near the intersections of Sutter and Larkin streets, and further east along Sutter and Post streets. Therefore, the Full Preservation Alternative would be anticipated to cause an exceedance of the wind hazard criterion at public pedestrian areas near the project site and impacts could be significant. RWDI recommended several design modifications such as planters, tall guardrails, and wind screens to achieve more favorable wind conditions. However, these strategies would have to be tailored to fit the design intent of the building and would require further assessment of their impact on wind conditions. As such, while mitigation measures could be developed to reduce this impact, it is not known if this impact could be reduced to less-than-significant level and this analysis conservatively identifies this impact as significant and unavoidable, with implementation of mitigation (**Impact WI-1: SUM; increased**). Cumulative impacts would likely remain less than significant, similar to the proposed project, due to the already densely built surrounding environment and intervening buildings between the alternative and cumulative projects (**Impact C-WI-1: LTS; similar**).

Overall, the Full Preservation Alternative would have reduced impacts compared to the proposed project on historic architectural resources because it would retain 1123 Sutter Street and avoid the project's significant unavoidable impacts to the resource, but it would have increased wind impacts due to the 200-foot height of the tower (significant and unavoidable).

⁴ Rowan William Davies & Irwin Inc., *1101-1123 Sutter Street, Alternatives Screening-Level Wind Analysis*, January 21, 2021.

5.D.3 Achievement of Project Objectives

The Full Preservation Alternative would fully meet three of the project objectives listed in Section 2.E, Project Sponsor's Objectives, and would partially achieve two of the objectives, as described below. Overall, it would meet or partially meet the project objectives.

The Full Preservation Alternative would fully meet objectives 3, 4, and 5. Objective 3 is to create a more attractive, interesting, and engaging street-level experience and objective 4 is to construct a single, cohesive development occupying the project site consisting of high-quality, contemporary urban design. The Full Preservation Alternative would achieve both these objectives through the building design and articulation at the first floor, retention of both existing historic resources on the site, and their incorporation into the overall project design. Objective 5 is to retain historic resources where it is economically and structurally feasible to rehabilitate the building's interior space for new commercial and residential uses. The Full Preservation Alternative would meet this objective by fully preserving 1101 Sutter Street and retaining the majority of character-defining features and some interior spaces at 1123 Sutter Street to the extent that is economically and structurally feasible.

The Full Preservation Alternative would partially meet objectives 1 and 2. Objective 1 is for a well-designed, financially feasible mixed-use project with residential housing units that contributes services to support the well-being of the community. While the Full Preservation Alternative would contribute services to the well-being of the community, it would have a 48 percent reduction in unit count compared to the proposed project. Objective 2 is to increase the City and County of San Francisco's supply of housing, including affordable housing, and maximize housing on the site. The Full Preservation Alternative partially meets this objective, as it would provide 106 fewer units than the proposed project. Therefore, overall, the Full Preservation Alternative would meet or partially meet the project objectives as compared to the proposed project.

5.E Partial Preservation Alternative 1

5.E.1 Description

Under the Partial Preservation Alternative 1, both 1101 Sutter Street and 1123 Sutter Street would be retained, with a four-story addition above each building, and an 18-story, 200-foot-tall residential tower would be constructed on the parking lot at the west side of the project site (on the existing surface parking lot); see Figure 5-2, Partial Preservation Alternative 1.

The overall size of this alternative would be smaller than the proposed project but larger than the Full Preservation Alternative, with 151 dwelling units (approximately 133,227 gross square feet of residential uses), less amenity and open space, and the same amount of commercial, childcare, and garage uses as the proposed project.

Details about the buildings would be as follows:

- 1101 Sutter Street would remain as described for the proposed project at the exterior but would have a four-story addition that would be set back 20 feet from both Sutter and Larkin streets, with a height of up to 85 feet. The architectural design details, material palette, and fenestration pattern of the addition would generally reflect the color palate and pattern of fenestration of the primary façade of the existing historic building at 1123 Sutter Street. This alternative would maintain the three street-facing facades of 1101 Sutter

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5.E. Partial Preservation Alternative 1

Street at Sutter, Larkin, and Hemlock streets, and as such, all of the character-defining features associated with fenestration, cladding, and façade details would be fully retained.

- 1123 Sutter Street would remain as in the existing conditions at the exterior but would be modified with the construction of a four-story addition. The addition would be set back 25 feet from the north façade at Sutter Street and would have a maximum height of 65 feet. The architectural design details, material palette, and fenestration pattern of the addition would generally reflect the color palate and pattern of fenestration of the primary façade of the existing historic building at 1123 Sutter Street. This alternative would maintain the primary (north) and rear (south) facades of 1123 Sutter Street, and as such, all of the character-defining features associated with fenestration, cladding, and façade details would be fully retained. Interior demolition and new construction for adaptive reuse would partially retain and rehabilitate interior spaces including the lobby/waiting room and rotunda/main entry to a sufficient degree to provide a transition between the portion of the building that would be retained and new spaces behind. The west and east chapels, which are also interior character-defining features, would not be retained.
- The new tower on the existing surface parking lot would have architectural design details, material palette, and fenestration patterns that would be the same as or similar to those of the proposed project but would be 18 stories (200 feet in height) as opposed to the proposed project which would be 14 stories (150 feet in height).

The Partial Preservation Alternative 1 would retain character-defining features associated with fenestration, cladding, and façade details but would alter the height and massing of both existing buildings with vertical additions, while in-filling the former at-grade parking lot.



SOURCE: David Baker Architects 2021

FIGURE 5-2

Partial Preservation Alternative 1

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5.E.2 Impacts

Unlike the proposed project, the Partial Preservation Alternative 1 would include constructing a four-story addition on 1101 Sutter, although it would still retain the exterior of the building. While this alternative would also retain the exterior of 1123 Sutter Street – unlike the proposed project, which would demolish the structure – it would also construct a four-story addition on this building. In addition, the proposed new 200-foot-tall building on the existing surface parking lot would be similar in design to the proposed project but would have an increased height.

The Partial Preservation Alternative 1 would retain most of the character-defining features of 1101 Sutter Street. It would maintain the three street-facing façades of 1101 Sutter Street at Sutter, Larkin, and Hemlock streets, and as such, all the character-defining features associated with fenestration, cladding, and façade details would be fully retained. Unlike the proposed project, the Partial Preservation Alternative 1 would include constructing a rectangular-plan four-story addition atop 1101 Sutter Street, which would be set back 20 feet from the north façade at Sutter Street and the east façade at Larkin Street, and as such would only partially retain the building's character-defining features relating to height and massing. Due to the four-story addition atop the existing three-story building, the building's height and massing would be modified. This would be a substantial adverse change to the individual historical resource, which is considered a significant impact. Even with implementation of mitigation measures similar to those identified for the proposed project under Impact CR-2 (described below), this impact would remain significant and unavoidable (**Impact CR-1: SUM; increased**).

The Partial Preservation Alternative 1 would retain many of the character-defining features of 1123 Sutter Street. The Partial Preservation Alternative 1 would maintain the primary (north) and rear (south) façades of 1123 Sutter Street, and as such, all the character-defining features associated with fenestration, cladding, and façade details would be fully retained. The Partial Preservation Alternative 1 would include constructing a rectangular-plan four-story addition atop 1123 Sutter Street that would be set back 25 feet from the north façade at Sutter Street, and as such would partially retain the character-defining features of both buildings relating to height and massing. At 1123 Sutter Street, interior demolition and new construction for adaptive reuse would partially retain and rehabilitate interior spaces including the lobby/waiting room and rotunda/main entry to a sufficient degree to provide a transition between the portion of the building that would be retained and new spaces behind.

Despite the retention of the exterior of the building, the new four-level addition to 1123 Sutter Street would have significant adverse impacts on the historic resource's ability to convey its historic significance. While this impact would be reduced compared to the proposed project, the Partial Preservation Alternative 1 would still result in a significant adverse impact to 1123 Sutter Street, and Project Mitigation Measures M-CR-2a: Historical Documentation; M-CR-2b: Interpretation; and M-CR-2c: Historical Architectural Salvage, identified for the proposed project, would be applicable. Even with implementation of these mitigation measures, this impact would remain significant and unavoidable (**Impact CR-2: SUM; somewhat reduced**).

Similar to the proposed project, the Partial Preservation Alternative 1 would not materially alter offsite historic resources and would not have substantial adverse effects on the adjacent Lower Nob Hill Apartment Hotel Historic District. Impacts under this alternative would be less than significant (**Impact CR-3: LTS; similar**). Also similar to the cumulative conditions under the proposed project, the Partial Preservation Alternative 1, in combination with other cumulative projects, would not result in significant cumulative impacts. Therefore, potential cumulative impacts would be less than significant (**Impact C-CR-1: LTS; similar**).

However, unlike the proposed project, the proposed 200-foot-high tower has the potential to create significant wind impacts due to its location on the site and the substantially lower height of surrounding buildings. Under the

Partial Preservation Alternative 1, with the west tower height increased by 50 feet compared to the proposed project, wind conditions along adjacent sidewalks would be expected to be more severe than for the proposed project.⁵ The highest wind speeds are predicted downwind (east) of the project site, near the intersections of Sutter and Larkin streets, and farther east along Sutter and Post streets. Therefore, the Partial Preservation Alternative 1 would be anticipated to cause an exceedance of the wind hazard criterion at public pedestrian areas near the project site, and impacts could be significant. While mitigation measures could be developed to reduce this impact, it is not known whether this impact could be reduced to a less-than-significant level; therefore, this analysis conservatively identifies this impact as significant and unavoidable with implementation of feasible mitigation (**Impact WI-1: SUM; increased**). Cumulative impacts would likely remain less than significant, similar to the proposed project, due to the already densely built-up surrounding environment and the intervening buildings between the alternative project site and nearby cumulative projects (**Impact C-WI-1: LS; similar**).

Overall, while the Partial Preservation Alternative 1 would retain the exterior of both historic resources on the site in contrast with the proposed project that would only retain 1101 Sutter Street, it would have increased impacts (new significant unavoidable impacts) associated with 1101 Sutter Street, and somewhat reduced impacts, although still significant and unavoidable, associated with 1123 Sutter Street, compared to the proposed project. Although Partial Preservation Alternative 1 would have increased impacts on 1101 Sutter Street in comparison with the proposed project, this alternative sought to balance impacts to historic resources across the larger site by retaining portions of both 1101 and 1123 Sutter Street. The Partial Preservation Alternative 1 would have increased significant and unavoidable wind impacts due to the 200-foot height of the tower.

5.E.3 Achievement of Project Objectives

The Partial Preservation Alternative 1 would fully meet two of the project objectives listed in Section 2.E, Project Sponsor's Objectives, and would only partially achieve three of the objectives, as described below. Overall, it would meet or partially meet the project objectives.

The Partial Preservation Alternative 1 would fully meet objectives 3 and 4. Objective 3 is to create a more attractive, interesting, and engaging street-level experience and objective 4 is to construct a single, cohesive development occupying the project site consisting of high-quality, contemporary urban design. The Partial Preservation Alternative 1 would achieve both these objectives through the building design and articulation at the first floor, the retention of the exterior of the historic resources on the site, and their incorporation into the overall project design.

The Partial Preservation Alternative 1 would partially meet objectives 1, 2, and 5. Objective 1 is for a well-designed, financially feasible mixed-use project with residential housing units that contributes services to support the well-being of the community. While the Partial Preservation Alternative 1 would contribute services to the well-being of the community, it would have a 32 percent reduction in unit count (reduction of 70 units). Objective 2 is to increase the city's supply of housing, including affordable housing, and to maximize housing on the site. As noted above, this alternative would provide 70 fewer units than the proposed project; therefore, it only partially meets this objective. Objective 5 is to retain historic resources where it is economically and structurally feasible to rehabilitate the building's interior space for new commercial and residential uses. The Partial Preservation Alternative 1 partially meets this objective, as it retains many of the character-defining features at both 1101 and 1123 Sutter Street; however, the four-story additions on both buildings would only partially retain height- and massing-related character-defining features, and at 1123 Sutter Street, interior

⁵ Rowan William Davies & Irwin Inc., *1101–1123 Sutter Street, Alternatives Screening-Level Wind Analysis*, January 21, 2021.

demolition and new construction for adaptive reuse would partially retain and rehabilitate interior spaces including the lobby/waiting room and rotunda/main entry, resulting in significant and unavoidable impacts to both resources. Therefore, overall, the Partial Preservation Alternative 1 would have partial (moderate) achievement of the project objectives compared to the proposed project.

5.F Partial Preservation Alternative 2

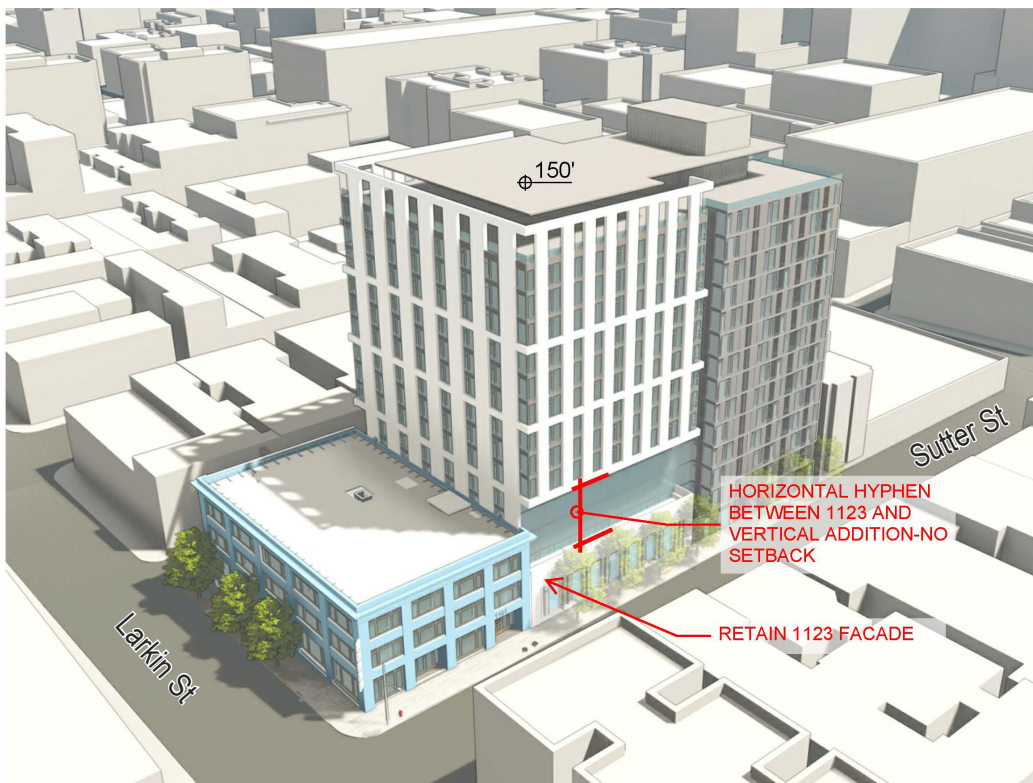
5.F.1 Description

Under Partial Preservation Alternative 2, a 14-story, 150-foot-tall tower at the site of the at-grade parking lot at the western edge of the project site would be constructed, with architectural design details and a material palette and fenestration pattern the same or similar to those of the proposed project; 1101 Sutter Street would have the same building exterior with no additions or major changes to the building's design; 1123 Sutter Street would have the primary (north) façade and some interior features retained but would be modified with construction of a 12-story vertical addition.

Details about the buildings are as follows:

- 1101 Sutter Street would remain as described for the proposed project, including the building exterior, with no additions or major changes to the building's design. All of the character-defining features associated with fenestration, cladding, and façade details would be fully retained. The height and massing of 1101 Sutter Street would also be fully retained.
- 1123 Sutter Street would maintain the primary (north) façade, but would include the construction of a 12-story addition up to a 150-foot height. A three-story, shallowly recessed horizontal hyphen consisting of mostly glass would separate the existing facade from the new tower above, which would not include a setback. The architectural design details, material palette, and fenestration pattern of the addition would generally reflect the color palette and pattern of fenestration of the primary façade of the existing historic building at 1123 Sutter Street. All the character-defining features associated with fenestration, cladding, and façade details would be fully retained, however, height and massing at 1123 Sutter Street would not be retained. Some interior character-defining features of the building, including the lobby/waiting room and rotunda/main entry, would be partially retained and rehabilitated to a sufficient degree to provide a transition between the portion of the building that would be retained and the new spaces. The west and east chapels, which are also interior character-defining features, would not be retained.
- The new tower on the existing surface parking lot would have architectural design details, material palette, and fenestration patterns that would be the same as or similar to those of the proposed project.

The Partial Preservation Alternative 2 would minimally alter the façades of the existing buildings at the project site, and would alter the height and massing of 1123 Sutter Street with a vertical addition, while in-filling the former at-grade parking lot (See Figure 5-3, Partial Preservation Alternative 2). This alternative would also retain some interior character-defining features of the existing building at 1123 Sutter Street.



SOURCE: David Baker Architects 2021

FIGURE 5-3

Partial Preservation Alternative 2

1101-1123 Sutter Street Project EIR

5.F.2 Impacts

Similar to the proposed project, 1101 Sutter Street would be retained and rehabilitated. Unlike the proposed project, the Partial Preservation Alternative 2 would retain some exterior and interior character-defining features of 1123 Sutter Street along with the construction of a 12-story addition to the existing building. The Partial Preservation Alternative 2 would also see the construction of a 14-story 150-foot-tall building on the existing surface parking lot that would be similar in design to the proposed project.

The Partial Preservation Alternative 2 would maintain the three street-facing facades of 1101 Sutter Street at Sutter, Larkin, and Hemlock streets. As such, all of the character-defining features associated with fenestration, cladding, and façade details would be fully retained. The Partial Preservation 2 Alternative would retain the height and massing of 1101 Sutter Street. 1101 Sutter Street does not have any interior character-defining features; therefore, changes to the interior of the building would not affect the resource. Impacts under this alternative would be less than significant (**Impact CR 1: LTS; similar**).

The Partial Preservation Alternative 2 would construct a 12-story vertical addition at 1123 Sutter Street, comprising a three-story, shallowly recessed horizontal connecting feature or ‘hyphen’ between the existing building and the remaining volume of the addition. This hyphen would be located above the historic building consisting mostly of glass, and a nine-story volume above the hyphen with no setback. The Partial Preservation Alternative 2 would maintain the primary (north) facade of 1123 Sutter Street, and as such, all of the character-defining features associated with fenestration, cladding, and façade details would be fully retained. Additionally, this alternative would retain some interior character-defining features of the building, including the lobby/waiting room and rotunda/main entry. Despite the retention of the exterior façade and some interior features of the building, the new 12-story addition to 1123 Sutter Street would not retain the character-defining features of height and massing of 1123 Sutter Street and would have significant adverse impacts on the ability of the building to convey its historic significance. Although the Partial Preservation Alternative 2 would lessen the impact on 1123 Sutter Street in comparison with the proposed project which proposes full demolition, it would still result in a significant adverse impact to 1123 Sutter Street, and Project Mitigation Measures M CR 2a: Historical Documentation; M CR 2b: Interpretation; and M CR 2c: Historical Architectural Salvage, identified for the proposed project, would be applicable. Even with implementation of these mitigation measures, this impact would remain significant and unavoidable (**Impact CR 2: SUM; somewhat reduced**).

Similar to the proposed project, the Partial Preservation Alternative 2 would not materially alter offsite historic resources (buildings) and would not have substantial adverse effects on the adjacent Lower Nob Hill Apartment Hotel Historic District. Impacts under this alternative would be less than significant (**Impact CR-3: LTS; similar**). Also similar to the cumulative conditions under the proposed project, the Partial Preservation Alternative 2, in combination with other cumulative projects, would not result in significant cumulative impacts. Therefore, potential cumulative impacts would be less than significant (**Impact C-CR-1: LTS; similar**).

The Partial Preservation Alternative 2 proposes a new 14-story 150-foot-tower at the site of the at-grade parking lot, along with a 12-story addition to the existing building at 1123 Sutter Street that would also reach 150 feet. With the same building heights as the proposed project, wind conditions along adjacent sidewalks would be expected to be similar to the proposed project. The wind analysis conducted by RWDI states that wind activity would be slightly more severe at building entrances, sideways, walkways, and above-grade terraces, but these slightly increased conditions would not exceed the wind hazard criterion. Therefore, the Partial Preservation Alternative 2 would not be anticipated to cause an exceedance of the wind hazard criterion at public pedestrian areas near the project site and impacts would be less than significant (**Impact WI-1: LTS; increased**). Cumulative

impacts would likely remain less than significant, similar to the proposed project, due to the building heights and already densely built surrounding environment and intervening buildings between the alternative and cumulative projects (Impact C-WI-1: LTS; increased).

5.F.3 Achievement of Project Objectives

The Partial Preservation Alternative 2 would fully meet two of the project objectives listed in Section 2.E, Project Sponsor's Objectives, and would only partially achieve three of the objectives, as described below. Overall, it would meet or partially meet the project objectives.

The Partial Preservation Alternative 2 would fully meet objectives 3 and 4. Objective 3 is to create a more attractive, interesting, and engaging street-level experience and objective 4 is to construct a single, cohesive development occupying the project site consisting of high-quality, contemporary urban design. The Partial Preservation Alternative 2 would achieve both these objectives through the building design and articulation at the first floor, retention of both existing historic resources on the site, and their incorporation into the overall project design.

The Partial Preservation Alternative 2 would partially meet objectives 1, 2, and 5. Objective 1 is for a well-designed, financially feasible mixed-use project with residential housing units that contributes services to support the well-being of the community. Since this alternative would result in a 3 percent reduction in unit count compared to the proposed project, it would not achieve this objective to the same extent as the proposed project. Objective 2 is to increase the City and County of San Francisco's supply of housing, including affordable housing, and maximize housing on the site. The Partial Preservation Alternative 2 would meet the objective of increasing housing supply; however, it would provide 7 fewer units than the proposed project. This alternative would still be subject to Section 415 of the San Francisco Planning Code which governs the provision of affordable housing (or an in-lieu fee). Objective 5 is to retain historic resources where it is economically and structurally feasible to rehabilitate the building's interior space for new commercial and residential uses. The Partial Preservation Alternative 2 partially meets this objective, similar to the determination for the proposed project. This alternative would fully retain all character-defining features at 1101 Sutter Street, similar to the proposed project; and, at 1123 Sutter Street, would fully retain the character-defining features that relate to fenestration, cladding, and façade details, unlike the proposed project. However, this alternative would only partially retain some character-defining interior spaces; and would not retain character-defining features that relate to building height and massing in regard to proposed changes at 1123 Sutter Street, but would retain more character-defining features than the proposed project. Therefore, overall, the Partial Preservation Alternative 2 would meet or partially meet the project objectives.

5.G Environmentally Superior Alternative

CEQA Guidelines section 15126.6(e)(2) requires identification of an environmentally superior alternative 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 some 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. However, the No Project Alternative would not meet any of the project sponsor's objectives. If the No Project

Chapter 5.

Alternatives

5.H. Alternatives Considered but Rejected





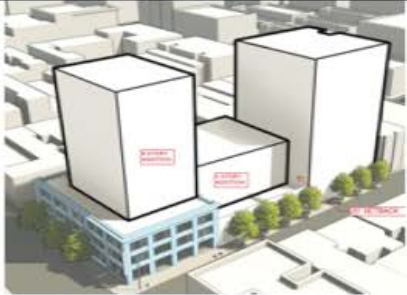




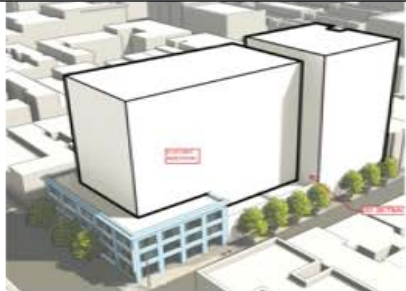
Alternative is environmentally superior, CEQA requires selection of the “environmentally superior alternative other than the no project alternative” from among the proposed project and the other alternatives evaluated.

The environmentally superior alternative would be the Full Preservation Alternative. This alternative would reduce Impact CR-2 by proposing only a two-level addition to 1123 Sutter Street which would not substantially impact the historic resource’s ability to convey its historic significance. However, this alternative could create a new significant and unavoidable wind hazard impact (Impact WI-1) due to a new 200-foot, 18-story building on the west side of the 1123 Sutter Street parcel. Therefore, this alternative would eliminate one significant impact while resulting in a different significant impact not associated with the proposed project.

5.H Alternatives Considered but Rejected

Pursuant to CEQA Guidelines section 15126.6(c), an EIR should “identify any alternatives that were considered by the lead agency but rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency’s determination.” As described above, the screening process for identifying viable EIR alternatives included consideration of the following criteria: ability to meet the project objectives, including maximizing housing on the site; potential ability to substantially lessen or avoid significant environmental effects associated with the proposed project; and potential feasibility.

As described in Section 5.A, Introduction, pp. 5-2 through 5-5, various heights for additions above 1101 and 1123 Sutter Street as well as various setbacks from the existing building façades were evaluated to reduce potential impacts to the historic buildings. Alternatives considered but rejected are shown in Figure 5-4. A tower with varying heights was evaluated for the surface parking lot of 1123 Sutter Street. Building heights for the alternatives considered but rejected were as follows: on the 1101 Sutter Street parcel, the schemes prepared had heights ranging from 55 feet (one-story addition) to 190 feet (15-story addition); on the 1123 Sutter Street building, the schemes had heights ranging from 35 feet (one-story addition) to 65 feet (four-story addition); and on the surface parking lot on 1123 Sutter Street, the schemes had heights ranging from 150 feet (14-story tower) to 200 feet (19-story tower). Previous alternatives considered were deemed infeasible due to various reasons: some rejected alternatives featured reduced setbacks that did not sufficiently preserve the character-defining features of the historic buildings, others would have required cost structural renovations for smaller additions that would only net a few additional residential units and did not meet project objectives, while others created potentially significant shadow impacts caused by the construction of taller additions on the 1101 Sutter Street site. Regarding shadow impacts, it was determined that alternatives involving a 190-foot tower at 1101 Sutter would cast a shadow onto the Redding Elementary School athletic field and playground. As discussed above, the Partial Preservation Alternative 2B was also rejected by the Historic Preservation Commission as they felt it did not sufficiently respond to the character-defining height and massing of the historic resources on the site and wanted to see an alternative that preserved some of the interior spaces at 1123 Sutter Street.

Full Preservation Alternative V1 	Full Preservation Alternative V2 	Partial Preservation Alternative 1 V1 	Partial Preservation Alternative 1 V2 
Partial Preservation Alternative 2 V1 	Partial Preservation Alternative 2 V2 	Partial Preservation Alternative 2 V3 	Partial Preservation Alternative 2 V4 
Partial Preservation Alternative V5 (formerly presented as Preservation Alternative 2B) 		Partial Preservation Alternative “Bulky” 	

SOURCE: ARG 2021

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