



PRELIMINARY MITIGATED NEGATIVE DECLARATION

Date: August 24, 2022
Case No.: **2021-001922ENV**
Project Title: **3150 California Street**
Zoning: NC-2 (Neighborhood Commercial Small-Scale) Use District
40-X Height and Bulk District
Block/Lot: 1022/013
Lot Size: 20,000 square feet
Project Sponsor: Michael Novak, San Francisco University High School
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Project Description:

The project sponsor, San Francisco University High School (SFUHS), is proposing construction of a new academic and athletic facility building at 3150 California Street in the Pacific Heights neighborhood of San Francisco. The proposed project consists of demolishing the existing building and parking lot and constructing a 48,000-square-foot, three-story-over-partial-basement building that would be 40 feet tall (plus a 10-foot-tall mechanical penthouse) and would contain classrooms, laboratories, athletic facilities, administrative facilities, a food service and dining area, a student center, and outdoor roof terrace gathering area. The proposed project would expand SFUHS's facilities and allow a gradual increase in student enrollment from 410 to 550 students over approximately five to ten years. SFUHS would also employ an additional 21 teachers, 4 administrators, and 8 staff members to accommodate the increase in enrollment. The attached initial study contains a detailed project description.

Finding:

This project could not have a significant effect on the environment. This finding is based upon the criteria of the Guidelines of the State Secretary for Resources, Sections 15064 (Determining Significant Effect), 15065 (Mandatory Findings of Significance), and 15070 (Decision to prepare a Negative Declaration), and the following reasons as documented in the Initial Evaluation (Initial Study) for the project, which is attached.

Mitigation measures are included in this project to avoid potentially significant effects. See pages 27, 34, 60, 75, and 104.

cc: Mary Woods, Current Planning Division

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INITIAL STUDY

3150 California Street
Planning Department Case No. 2021-001922ENV

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Project Description

Overview

The project sponsor, San Francisco University High School (SFUHS), is proposing construction of a new academic and athletic facility building at 3150 California Street in the Pacific Heights neighborhood of San Francisco. The 3150 California Street Project (proposed project) consists of demolishing the existing building and parking lot on this site and constructing a 48,000-square-foot, three-story-plus-partial-basement building. The proposed building would be 40 feet tall (plus a 10-foot-tall mechanical penthouse) and would contain classrooms, laboratories, athletic facilities, administrative facilities, a food service and dining area, a student center, and outdoor roof terrace gathering area. The proposed building would be the fifth SFUHS campus building (Figure 1). The four existing buildings that comprise the existing SFUHS campus include the Upper Building at 3065 Jackson Street, the Middle Building at 3150 Washington Street, the Lower Building at 3185 Washington Street, and the South Building at 3220 Sacramento Street. The SFUHS campus also includes the Paul Goode Field athletic complex, located on land within and leased from the Presidio, and the home for the head of the school, located at 3954 Washington Street. The proposed project would expand SFUHS's facilities and allow a gradual increase in student enrollment by 35 percent, from 410 to 550 students over approximately five to ten years. SFUHS would also employ an additional 21 teachers, 4 administrators, and 8 staff members to accommodate the increase in enrollment. The increase of 140 students and 33 staff would be distributed across all five campus buildings.

Project Site Location and Existing Uses

The rectangularly-shaped project site is located on the north side of California Street between Presidio Avenue and Lyon Street. It is within 200 feet of the University of California, San Francisco Laurel Heights Campus and the Jewish Community Center complex. The project block is bounded by California Street to the south, Presidio Avenue to the west, Sacramento Street to the north, and Lyon Street to the east. Buildings adjacent to the project site include a four-story-over-basement-parking hotel (The Laurel Inn) to the west, a four-story-over-basement-parking residential building to the east, and multi-family residential uses to the north. The project site's California Street frontage has a 12-foot grade change, sloping up from east to west. The project site also has a 21-foot grade change when measured diagonally, sloping up from its southeast corner to the northwest corner.

The project site encompasses approximately 20,000 square feet (approximately 0.46 acres) and currently is occupied by a 9,750-square-foot, L-shaped, two-story wood-framed commercial/office building, which was originally constructed in 1942 and rehabilitated in 1956 and again in 1977, and a 10,139-square-foot, 22-space, asphalt-paved parking lot (Figure 2, p. 7). The existing building contains SFUHS business, development and technology offices, a retail pet store, and administrative office spaces. In total, the project site contains approximately 6,000 gross square feet (gsf) of commercial uses, 11,815 gsf of parking space, 3,330 gsf of office uses, and 2,410 gsf of institutional uses. Access to the project site is via California Street. There are two approximately 12-foot-long curb cuts and four street trees along the project site's California Street frontage. The project site is zoned as a Neighborhood Commercial, Small-Scale District (NC-2) and is in a 40-X height and bulk district.

FIGURE 1 **EXISTING SFUHS CAMPUS BUILDINGS AND PROPOSED PROJECT SITE**



Sources: (USGS, 2016; Tele Atlas North America, Inc, 2018; State of California, 2021)

Nearby transit lines include the San Francisco Municipal Railway's (Muni's) 43-Masonic and 1-California bus lines, with stops located approximately 200 feet west of the project site on the west side of the intersection of Presidio Avenue and California Street.

Project Characteristics

The proposed project consists of demolishing the existing 2-story, 20-foot-tall, wood-framed building and surface parking lot and constructing a 48,000-square-foot, three-story-plus-partial-basement building that would be 40 feet tall (plus a 10-foot-tall mechanical penthouse) and would contain classrooms, a student center, athletic facilities, a food service and dining area, faculty and administrative offices, and outdoor roof terrace gathering area at the north side of the third level (Figure 2, p. 7). All of the proposed facilities would be used by SFUHS. Uses and facilities by floor would be as follows:

Basement Level: mechanical space for pumps, firefighting water, minimum point of entry, stormwater cistern, an electrical room, and storage (Figure 3, p. 8)

First Floor/Level 1: main entry and lobby to the building on California Street, bike storage, administrative offices, a gym, and a common area for students (Figure 4, p. 9)

Second Floor/Level 2: a food service and dining area, a transformer room, common areas for students, and classroom (Figure 5, p. 10)

Third Floor/Level 3: laboratories and general classrooms, additional administrative space, and a roof terrace (Figure 6, p. 11)

Roof Level: a mechanical area, electrical closet, elevator overrun and solar photovoltaic array, installed on approximately 13,375 square feet of the roof (Figure 7, p. 12)

The proposed project would include approximately 2,840 gsf of open space (which includes a patio area running parallel to California Street, an outdoor terrace on the second floor, and a large roof terrace). Forty-eight Class I bicycle parking spaces would be provided on the first floor of the building and one bike rack containing 2 Class II bicycle parking spaces would be provided on the California Street sidewalk in front of the new building.¹ Four to ten Class II bicycle parking spaces would be provided in front of the other existing school buildings. The proposed project would not include any automobile parking. Project characteristics are summarized in Table 1 below.

1 Class I bicycle parking spaces are spaces in secure, weather-protected facilities intended for use as long-term, overnight, and work-day bicycle storage by students and staff. Class II bicycle parking 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.

Table 1 **Project Characteristics**

Project Characteristics	Existing	Proposed	Net Change
Land Uses (gsf)			
Parking	11,815	0	-11,815
Commercial Use	6,000	0	-6,000
Office Use	3,330	0	-3,330
Cultural, Institutional, Educational Use	2,410	47,551	+45,141
Useable Open Space	0	2,840	+2,840
Building Characteristics			
Height (feet)	20	40	+20
Parking and Loading			
Off Street Parking (spaces)	22	0	-22
Passenger Loading (feet)	0	78	+78
Accessible Parking (feet)	0	22	+22
Bicycle Parking (spaces)			
Class I	0	48	+48
Class II	0	12	+12

Source: (SFUHS, 2022)

Demolition of the existing building and parking lot and construction of the proposed project would require removal and replacement of two of the four existing street trees. Demolition would also require removal of several small shrubs and three small, unprotected trees in the building planters adjacent to the parking lot. Two existing street trees (at the western end of the property) would remain, and one additional street tree would be planted. Landscaping would be added along the southern boundary of the project site, on the ground level of the building, and on the third-floor terrace. Overall, the proposed project would include the addition of eight trees (two street trees and six non-street trees); approximately 650 shrubs, grasses, or ferns; and approximately 80 succulents.

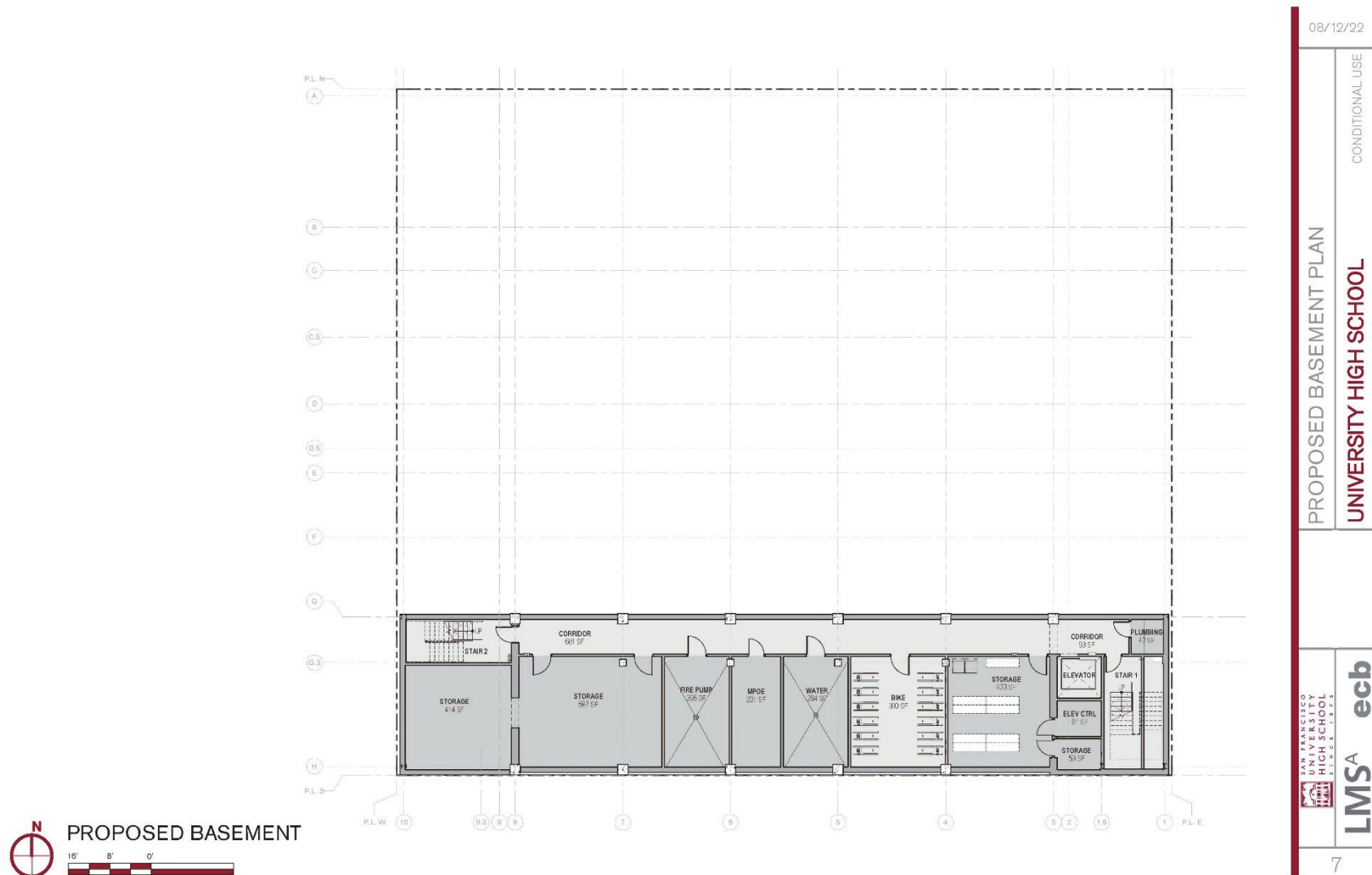
Sidewalk and streetscape changes along California Street would include removal of two curb cuts, each approximately 12 feet in length and installation of a 152-foot passenger loading zone, which would include 132 feet of white curb, two accessible loading spaces, and two 10-foot curb ramps. The purpose of the sidewalk and streetscape changes would be to accommodate student pick-up and drop-off.

FIGURE 2 **PROPOSED PROJECT SITE**



Sources: (USGS, 2016; Tele Atlas North America, Inc, 2018; San Francisco County, 2021)

FIGURE 3 FLOOR PLANS: BASEMENT LEVEL



Source: (SFUHS, 2022)

FIGURE 4 FLOOR PLANS: LEVEL 1



08/12/22

CONDITIONAL USE

PROPOSED LEVEL 1 PLAN
UNIVERSITY HIGH SCHOOL

SAN FRANCISCO
UNIVERSITY
HIGH SCHOOL
JULY 1, 1991
LMSA ecb

8

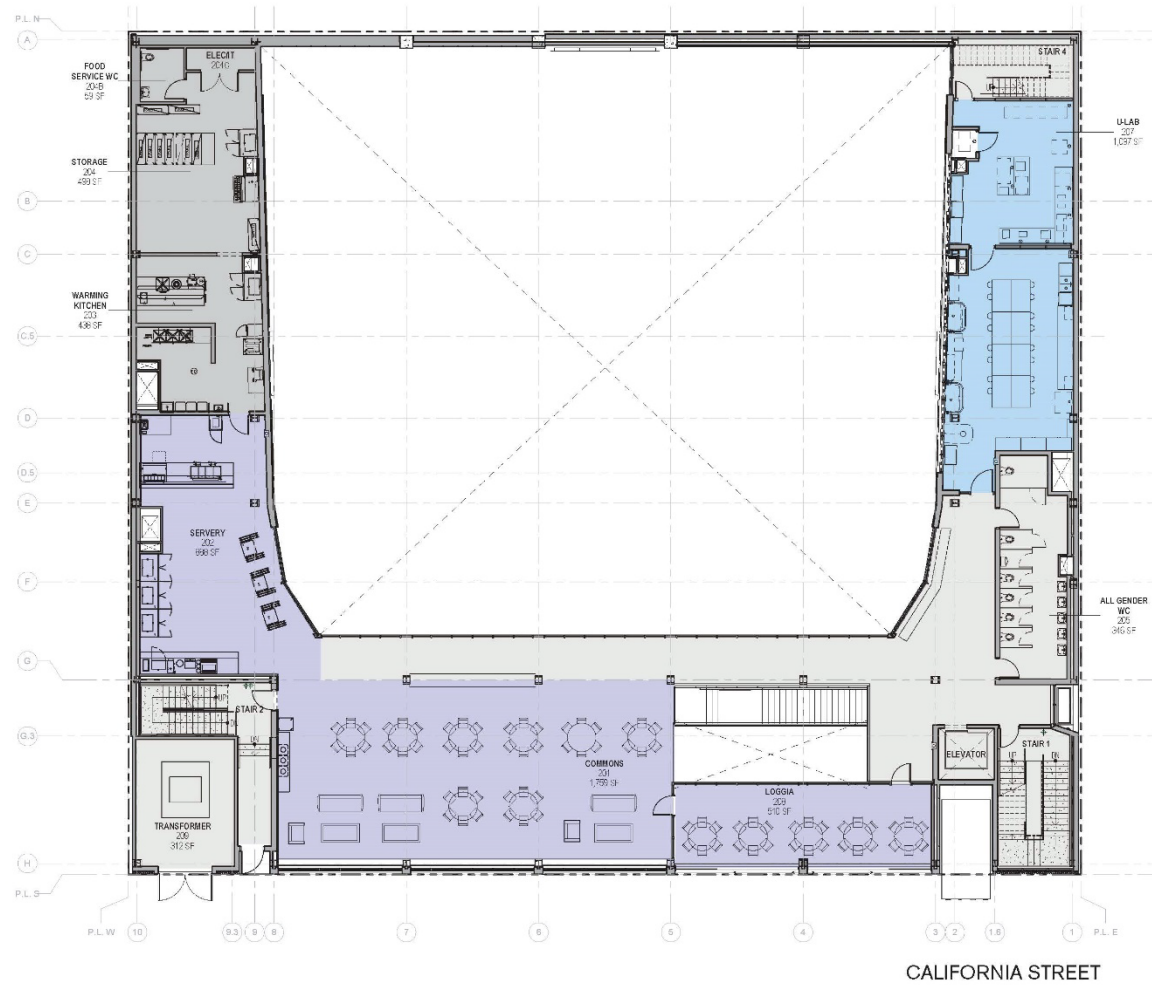


Source: (SFUHS, 2022)

FIGURE 5 FLOOR PLANS: LEVEL 2



Source: (SFUHS, 2022)



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CONDITIONAL USE

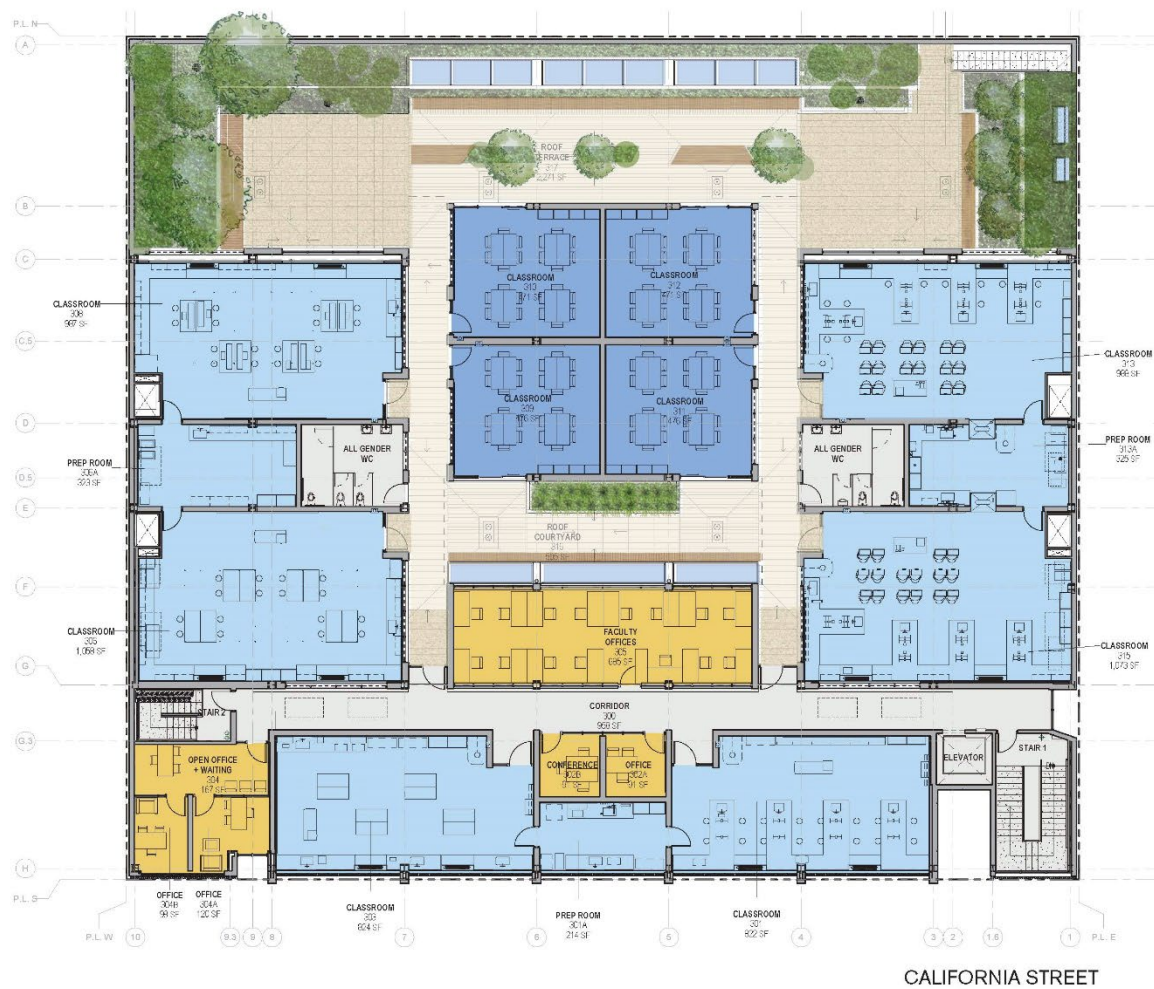
PROPOSED LEVEL 2 PLAN
UNIVERSITY HIGH SCHOOL



LMSA ecb

9

FIGURE 6 FLOOR PLANS: LEVEL 3



08/12/22

CONDITIONAL USE

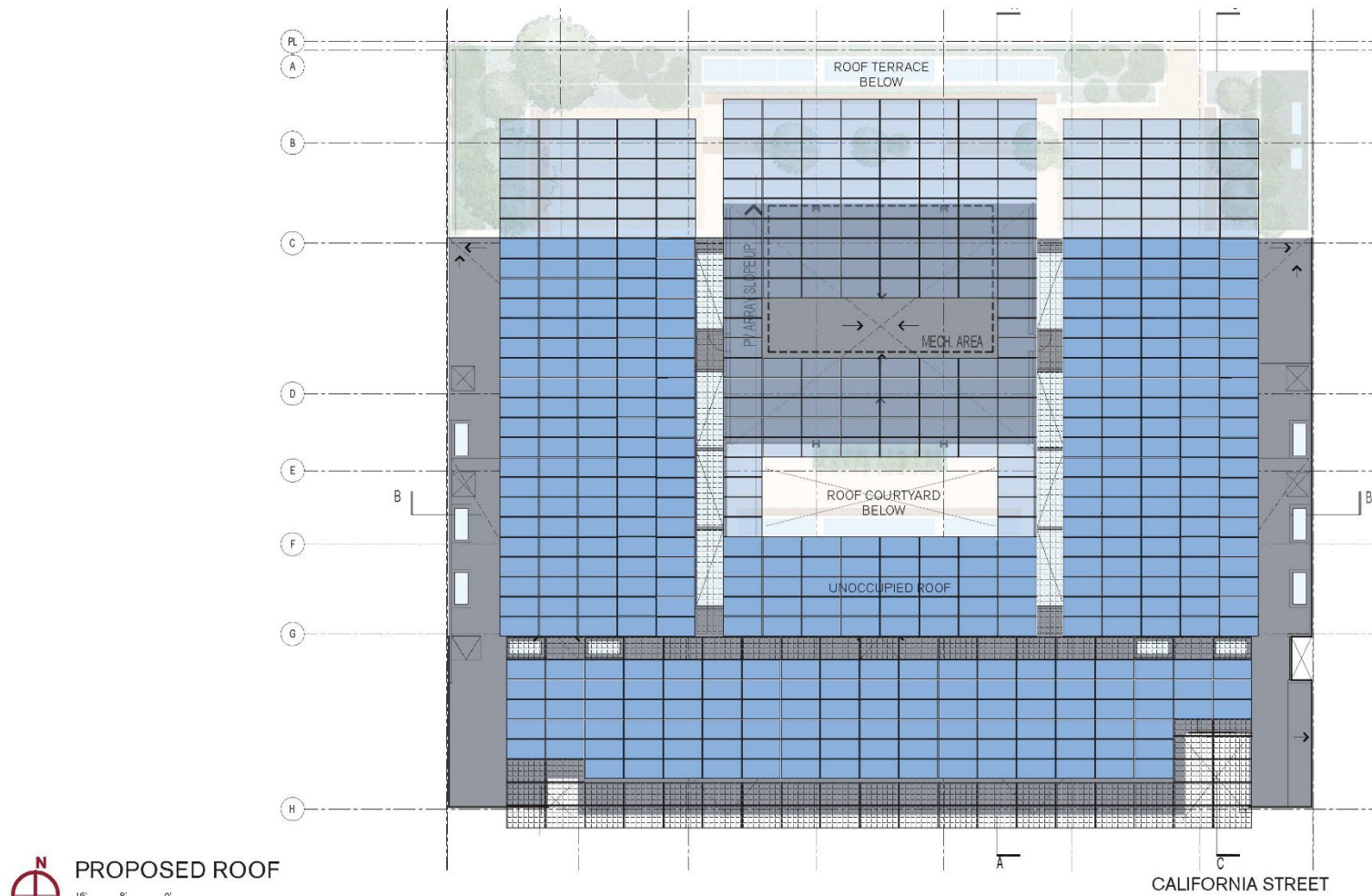
PROPOSED LEVEL 3 PLAN
UNIVERSITY HIGH SCHOOL

SAN FRANCISCO
UNIVERSITY
HIGH SCHOOL
JULY 1, 2021
LMSA ecb

10

Source: (SFUHS, 2022)

FIGURE 7 FLOOR PLANS: ROOF



08/12/22

CONDITIONAL USE

PROPOSED ROOF PLAN

UNIVERSITY HIGH SCHOOL

SAN FRANCISCO
UNIVERSITY
HIGH SCHOOL
JULY 1, 1971

LMSA ecb

11

Source: (SFUHS, 2022)

Project Construction

Project Construction Overview and Schedule

Project construction is anticipated to begin in June 2023 and last approximately 20 months.² The anticipated construction schedule is summarized in Table 2.

Table 2 Construction Schedule

Project Phase	Approximate Start Date	Approximate End Date	Approximate Duration (calendar days)
Demolition	6/13/2023	7/27/2023	42
Shoring and Excavation	7/28/2023	11/17/2023	111
Foundation and Utilities	11/10/2023	1/19/2024	71
Structural Steel and Concrete Decks	9/14/2024	4/29/2024	137
Roofing and Façade	4/3/2024	7/20/2024	77
Interiors	3/26/2023	11/9/2024	227
Startup, Inspections, and Furniture	11/29/2024	1/17/2025	50
Total	6/13/2023	1/17/2025	582

Soil Excavation and Disturbance

Project construction would require excavation to a depth of approximately 10 to 26 feet below ground surface, with an anticipated total soil excavation volume of approximately 14,000 cubic yards. The depth of excavation would depend on the elevation of the ground surface, which varies across the project site. The proposed project is expected to require little or no fill material. If fill material is required, it would likely consist of excavated on-site soil or imported soil and drain rock. The new building would rest on a mat foundation. Pile driving would not be required.

Construction Staging Areas

The project site has limited space for on-site vehicle and equipment staging, and therefore most vehicle and equipment staging would occur offsite and in limited areas on site. The sidewalk area along the southern boundary of the new building would be used for loading and unloading materials. Two staging areas would be next to the sidewalk along the southern boundary of the new building (along the California Street sidewalk) and would contain dumpsters, construction offices, and a fenced laydown area. A covered pedestrian walkway would be constructed within the existing on-street parking spaces at 3150 California Street, because the sidewalk would be closed to pedestrian traffic during construction. A standard 8-foot-tall chain link construction fencing with green vision fabric would be installed on the southern boundary of the project site, along the north side of the pedestrian pathway. Two gates would be installed along the pedestrian pathway to allow ingress/egress of construction vehicles during the demolition, shoring, and excavation phases.

² The Health Risk Assessment prepared for the 3150 California Street Project utilizes the 19-month construction duration and a slightly modified construction schedule than the 20-month duration and construction schedule identified in this Initial Study. The difference in construction duration and schedule would not be anticipated to change the results of the health risk assessment or the analysis in this Initial Study.

Construction Schedule and Workforce

Typical construction activities would occur between 7:00 a.m. and 3:30 p.m. Monday through Friday. Shoring and other selected construction activities may require 10-hour workdays, with work occurring between 7:00 a.m. and 5:30 p.m. An average of 41 construction workers are expected to be on site daily during weekdays throughout the duration of project construction, with a maximum of 81 construction workers on site at any one time. Work may occur on Saturdays, on an as-needed basis. If Saturday work is required, an average of nine construction workers are expected to be on site, with a maximum of 20 construction workers on site. Nighttime work is not anticipated, but on-site security lighting may be used during off-hours. There may be security personnel on site during any periods of dewatering, as well as camera surveillance throughout construction.

Operations

Operational activities at the new building would be similar to the ongoing activities at the existing SFUHS campus facilities. These activities would include classroom instruction, drop-off and pick-up of students, administrative work, vegetation management/landscaping, and routine facility maintenance. School hours for the new building at 3150 California Street would be the same as the existing campus, and would be from approximately 8:00 a.m. to 3:00 p.m., with some students staying later for sports or other after school activities. The typical first day of school for the existing SFUHS campus and the new building would be in mid-August, and the typical last day of school would be at the end of May or beginning of June. The proposed building may also be used for SFUHS's Summerbridge program, a year-round and summer intensive academic enrichment and advocacy program, during the months when school is not in session. Additionally, the proposed building at 3150 California Street may occasionally be used by local non-profits when not in use by SFUHS, similar to existing SFUHS operations and hours of use.

The new building would use surveillance cameras and badged entry for faculty, staff, and students, similar to the existing SFUHS buildings. As discussed above, the proposed project would allow an increase in student enrollment from 410 to 550 students over approximately five to ten years. To accommodate the increase in enrollment, SFUHS would employ an additional 21 teachers, 4 administrators, and 8 staff members, increasing the total number of employees from 147 to 180. Similar to the increase in students, the increase in staff would be distributed across all five campus buildings and implemented incrementally.

The new building at 3150 California Street would be used for sporting events, including but not limited to basketball, volleyball, badminton, and fencing, and all-school or grade-wide meetings. These events are currently held in the existing gym and existing auditorium at the upper and middle campus buildings. Sporting events occur approximately three to eight times per month during the school year and may occur during the week but also on the weekends. Sporting events typically occur in the late afternoon and early evening.

After construction of the new building is completed, student pick-up and drop-off activity would be evenly split between the Washington Street and California Street buildings, based on the proposed classrooms and activity centers at the new building. Crossing monitors are stationed at the mid-block crosswalk on Washington Street and at the intersection of Lyon Street and Clay Street to facilitate student and faculty movement through the neighborhood to the various buildings that comprise the SFUHS campus. Additional crossing monitors may be needed with implementation of the proposed project.

A School Drop-off and Pick-up Management Plan³ was developed to guide the proposed project's student loading activities and develop strategies to minimize impacts to the California Street and Washington Street travel lanes. As described in the plan, one or two staff monitors (as needed) would manage morning drop-off and afternoon pick-up operations during the peak 15 to 30 minutes of each loading period at the new loading zone on California Street and the existing loading zone on Washington Street. Positioning staff monitors at the loading zone during the peak period would ensure that the loading zone is used effectively and that the queue does not spill into the California Street travel lane or block public transit.

Project Approvals

The proposed project would require the following approvals:

Planning Commission

- Conditional Use Authorization for the following:
 - develop a lot more than 10,000 square feet in the NC-2 District
 - institutional use more than 4,000 square feet in the NC-2 District
 - institutional use on a second floor and above in the NC-2 District
 - modifications to conditions of approval under Planning Commission Motions No. 13578 (1993), 17102 (2005), and 19066 (2014), for a Planned Unit Development (PUD) for an enrollment increase from 410 to 550 students in the Residential–House, Three-Family District (Section 209.1), NC-2 (Section 711), and the Sacramento Street Neighborhood Commercial District (Section 724); and to include the proposed project in the PUD and for modifications to the rear yard in the NC- 2 District.

Department of Building Inspection

- Shoring and Underpinning Permits
- Demolition Permit
- Site Permit and Addenda
- Solar Photovoltaic (PV) System permit for installation of roof building PV system

Municipal Transportation Agency

- Colored curb approval for passenger loading zone and accessible parking zone
- Temporary alteration to the overhead Muni wires, if required.

Department of Public Works

- Temporary Sidewalk Use permit for the parking spaces on California Street, where construction barricades would be installed in the parking lane
- Street Improvement permit for impacts on facilities in the public right-of-way
- Minor Sidewalk Encroachment permit for the shoring of the southern property line at the public right-of-way
- Side Sewer permit for construction of a new sanitary line
- Tree Planting and Tree Removal Permits

3 Fehr & Peers, 20221, UHS 3150 California Avenue Transportation Circulation Study –Final Memorandum, Appendix C, School Drop-off and Pick-up Management Plan

- Minor encroachment permit for door swings at the back edge of the California Street sidewalk for an “in building” PG&E transformer room

Public Utilities Commission

- Stormwater Control Plan for creation of 5,000 square feet or more of impervious surface
- Erosion and Sediment Control Plan for ground disturbance between 5,000 square feet and 1 acre
- Domestic water service
- Irrigation water service
- Fire Suppression water service

Department of Public Health

- Article 38 Enhanced Ventilation Requirement approval
- Food Service permit

Conditional use authorization by the Planning Commission would constitute approval action for the proposed project. The approval action date would establish the start of the 30-day appeal period for the Final Mitigated Negative Declaration to the Board of Supervisors pursuant to section 31.04(h)(3) of the San Francisco Administrative Code.

Project Setting

Project Site and Surrounding Land Uses

The project site is a mid-block site on the north side of California Street, between Presidio Avenue and Lyon Street, in the Pacific Heights neighborhood of San Francisco. The project block is bounded California Street to the south, Presidio Avenue to the west, Sacramento Street to the north, and Lyon Street to the east. California Street is a two-way throughfare with two lanes in each direction. The topography of the project site has a 12-foot grade change, sloping up from east to west, along California Street and a 21-foot grade change when measured diagonally from the southeast corner (lowest point) to the northwest corner (highest point) of the site.

Buildings in the immediate project vicinity vary in height from one to four stories. As noted above, under Project Site Location and Existing Uses, the Laurel Inn, west of the project site on the northeast corner of California Street and Presidio Avenue, is a four-story building over a partially subterranean garage. The property adjacent to and east of the project site is occupied by a four-story building with residential uses above ground-floor commercial use and a subterranean garage. Other buildings on California Street between Lyon Street and Presidio Avenue vary in height and have residential and commercial uses. The surrounding neighborhood includes a university campus (University of California, San Francisco Laurel Heights Campus, which is slated to become a residential property)⁴, community centers, commercial buildings, and residential uses. The project site is in close proximity to public transportation. Muni’s 43-Masonic and 1-California bus lines operate on Presidio Avenue and California Street, respectively. The 31-Balboa and 38-Geary bus routes also operate one block and two blocks south of the project site, respectively.

4 3333 California Street Mixed-Use Project, Final Environmental Impact Report, 2019, Case No. 2015-014028ENV

Cumulative Context

CEQA Guidelines section 15130(b)(1) provides two methods for cumulative impact analysis: the “list-based approach,” and the “projections-based approach.” The list-based approach uses a list of projects (within approximately a quarter-mile radius of the project site and for which the Planning Department has a project application on file) producing closely related impacts that could combine with those of a proposed project to evaluate whether the project would contribute to significant cumulative impacts. The projections-based approach uses projections contained in a general plan or related planning document to evaluate the potential for cumulative impacts. This analysis employs both the list-based and projections-based approaches, depending on which approach best suits the resource topic being analyzed.

The cumulative analysis for certain localized impact topics (e.g., cumulative shadow and wind effects) uses the list-based approach. The following is a list of reasonably foreseeable projects within the project vicinity (approximately one-quarter mile) that are included:

Case No. 2015-014028ENV: 3333 California Street (demolition of the existing medical office buildings and redevelopment of the 10.25-acre site with up to 744 dwelling units, approximately 35,000 square feet of commercial space, 15,000 square feet of childcare space, 754 parking spaces, and 839 bicycle parking spaces)

Case No. 2014-001576ENV: 726 Presidio Avenue (residential remodel to add four units and seven parking spaces to an existing three-unit building)

Case No. 2018-014021ENV: 2601 Sutter Street (demolition of the existing commercial building and construction of a four-story, three-unit building with three parking spaces)

Implementation of the nearby cumulative development projects would result in construction of a total of 754 dwelling units, approximately 35,000 square feet of commercial space, 15,000 square feet of childcare space, 764 automobile parking spaces, and 839 bicycle parking spaces within one-quarter mile of the project site. The cumulative projects are shown in [Figure 8](#).

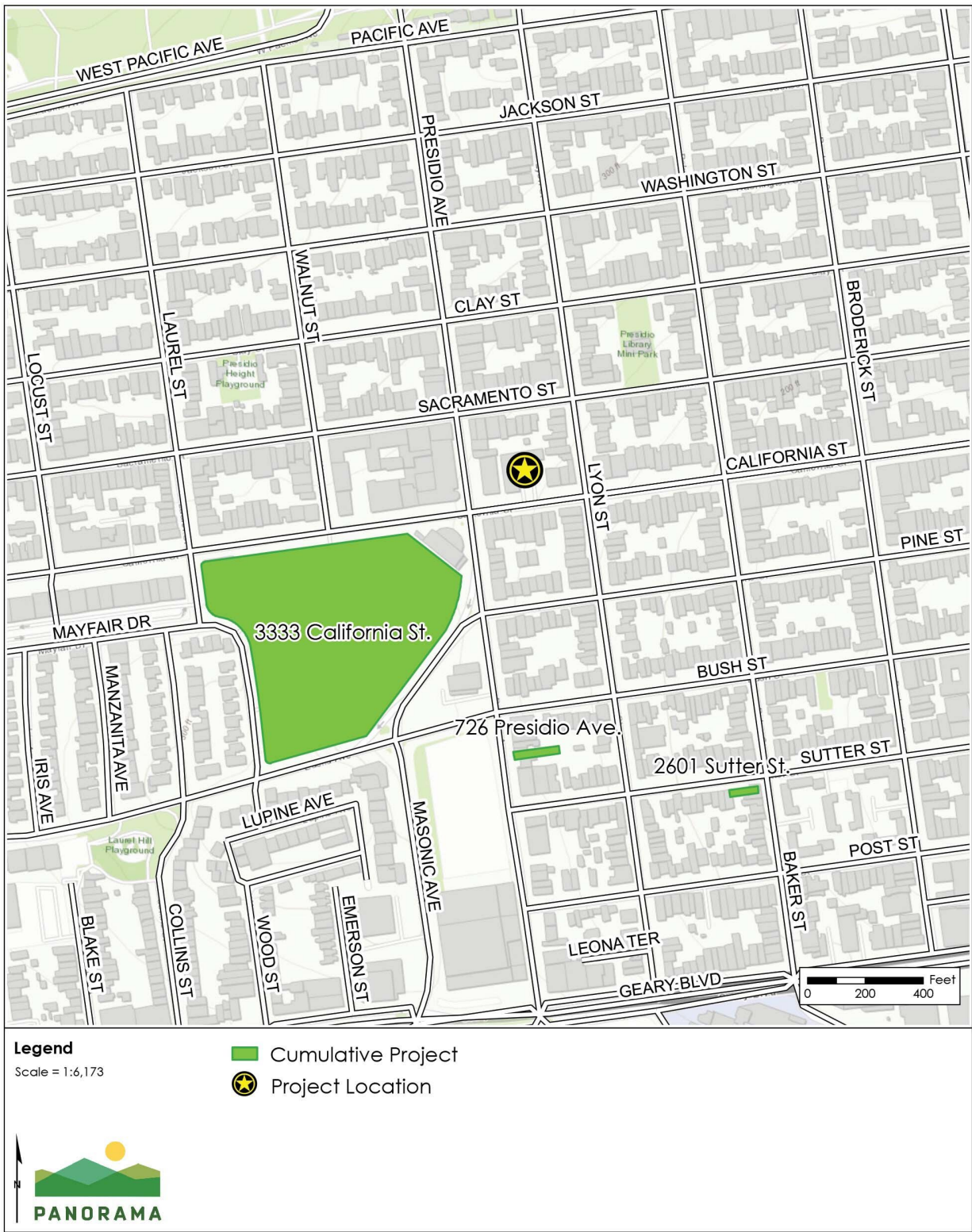
Summary of Environmental Effects

The proposed project potentially could result in adverse physical effects on the environmental resources checked below, and where those impacts are significant or potentially significant, CEQA requires identification of mitigation measures to reduce the severity of the impacts to a less-than-significant level to the extent feasible. This Initial Study presents a more detailed checklist and discussion of each environmental resource, unless otherwise noted below.

- | | | |
|---|--|---|
| ☐ Land Use and Planning | ☐ Greenhouse Gas Emissions | ☐ Hydrology and Water Quality |
| ☐ Aesthetics | ☐ Wind | ☐ Hazards and Hazardous Materials |
| ☐ Population and Housing | ☐ Shadow | ☐ Mineral Resources |
| ☒ Cultural Resources | ☐ Recreation | ☐ Energy |
| ☒ Tribal Cultural Resources | ☐ Utilities and Service Systems | ☐ Agriculture and Forestry Resources |
| ☐ Transportation and Circulation | ☐ Public Services | ☐ Wildfire |
| ☒ Noise | ☐ Biological Resources | ☐ Mandatory Findings of Significance |
| ☒ Air Quality | ☒ Geology and Soils | |

This Initial Study examines the proposed project to identify potential effects on the environment. For each item on the Initial Study checklist, the evaluation has considered the impacts of the proposed project both individually and cumulatively. All items on the Initial Study checklist that have been checked “Less than Significant Impact with Mitigation Incorporated,” “Less than Significant Impact,” “No Impact,” or “Not Applicable” indicate that, upon evaluation, the Planning Department has determined that the proposed project could not have a significant adverse environmental effect relating to that issue. A discussion is included for those issues checked “Less than Significant Impact with Mitigation Incorporated” and “Less than Significant Impact,” and for most items checked with “No Impact” or “Not Applicable.” For all of the items checked “No Impact” or “Not Applicable” without discussion, the conclusions regarding potential significant adverse environmental effects are based upon field observation, staff experience and expertise on similar projects, and/or standard reference material available within the Planning Department, such as the Transportation Impact Analysis Guidelines for Environmental Review or the California Natural Diversity Data Base and maps, published by the California Department of Fish and Wildlife. The items checked above have been determined to be “Less than Significant with Mitigation Incorporated.”

FIGURE 8 CUMULATIVE PROJECTS



Source: (ESRI, 2022; DATASF, 2022; CALTRANS, 2022)

NO IMPACT OR NOT APPLICABLE ENVIRONMENTAL TOPICS

The proposed project would have no impact on the following environmental topics, and therefore they are not discussed further in this Initial Study: Aesthetics, Agriculture and Forestry Resources, Mineral Resources, and Wildfire. This section briefly describes why these topics would have no impact or are not applicable to the proposed project.

Aesthetics and Parking

In accordance with CEQA Section 21099: Modernization of Transportation Analysis for Transit-Oriented Projects, aesthetics and parking shall not be considered in determining if a project has the potential to result in significant environmental effects, provided the project meets all of the following three criteria:

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

The proposed project meets each of the above criteria; therefore, this Initial Study does not consider aesthetics or parking in determining the significance of project impacts under CEQA.⁵

Automobile Delay and Vehicle Miles Traveled

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

In January 2016, the OPR published for public review and comment a Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA⁶ recommending that transportation impacts for projects be measured using a vehicle miles traveled (VMT) metric. On March 3, 2016, in anticipation of the future certification of the revised CEQA Guidelines, the San Francisco Planning Commission adopted the OPR's recommendation to use the VMT metric instead of automobile delay to evaluate the transportation impacts of projects (Resolution No. 19579). The VMT metric does not apply to the analysis of project impacts on non-automobile modes of travel such as riding transit, walking, and bicycling. Accordingly, this initial study does not contain a discussion of impacts regarding automobile delay. Instead, an impact analysis regarding VMT and induced automobile travel is provided in Section E.5, Transportation and Circulation.

Agriculture and Forestry Resources

The project site is within an urbanized area in the city and county of San Francisco and does not contain any prime farmland, unique farmland, or farmland of statewide importance; forest land; or land under

5 San Francisco Planning Department, Eligibility Checklist for CEQA Section 21099: Modernization of Transportation Analysis, 3150 California Street, December 7, 2021.

6 Governor's Office of Planning and Research, Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA, January 20, 2016. Available at: http://opr.ca.gov/docs/Revised_VMT_CEQA_Guidelines_Proposal_January_20_2016.pdf. Accessed August 23, 2020.

Williamson Act contract. The project site is not zoned for any agricultural uses. Therefore, the proposed project would have no impact, either individually or cumulatively, on agriculture or forest resources.

Mineral Resources

The project site is not in an area with known mineral resources, and the proposed project would not extract mineral resources. Therefore, the proposed project would have no impact on mineral resources and would not contribute to any cumulative mineral resource impact.

Wildfire

The project site is not in or near state responsibility lands for fire management or lands classified as very high fire hazard severity zones. Therefore, this topic is not applicable to the proposed project.

Evaluation of Environmental Effects

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact	Not Applicable
1. LAND USE AND PLANNING. Would the project:					
a) Physically divide an established community?	☐	☐	☒	☐	☐
b) Cause a significant physical environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐	☐

Impact LU-1: The proposed project would not physically divide an established community. (*Less than Significant*)

Land use impacts related to the physical division of an established community typically involve construction of a physical barrier to neighborhood access, such as a new freeway, or removal of an existing means of access, such as a bridge or a roadway. The proposed project would not permanently close any streets and would not construct a physical barrier to neighborhood access or remove an existing means of access, such as a bridge or roadway, that would create an impediment to the passage of persons or vehicles. Although the sidewalk on the southern boundary of the project site would be closed temporarily to pedestrian traffic during project construction, a covered pedestrian detour route would be established within the existing on-street parking spaces to allow unimpeded pedestrian access along California Street for the duration of the sidewalk closure. The project may require closure of the right westbound travel lane on California Street to accommodate construction activities. The left westbound travel lane would remain open to vehicle traffic and the temporary lane closure would not impede vehicle traffic along California Street. Thus, the proposed project would not physically divide an established community. The impact would be less than significant. No mitigation would be required.

Impact LU-2: The proposed project would not cause a significant physical environmental impact due to a conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. (*Less than Significant*)

Land use impacts could be potentially significant if the proposed project would conflict with any plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental impact. Environmental plans and policies are those that directly address environmental issues and/or contain targets or standards that must be met in order to preserve or improve characteristics of the City's physical environment.

Examples of such plans, policies, or regulations include the Bay Area Air Quality Management District's *2017 Clean Air Plan* and the San Francisco Regional Water Quality Control Board's *San Francisco Basin Plan*. As discussed in Section E.7, Air Quality, Section E.8, Greenhouse Gas Emissions, and Section E.14, Biological Resources, the proposed project would not conflict with any plan, policy or regulation adopted for the purpose of avoiding or mitigating an environment effect, including the *2017 Clean Air Plan*, San Francisco's *Strategies to Address Greenhouse Gas Emissions* (GHG Reduction Strategy), and the San Francisco Urban Forestry Ordinance, respectively. The impact would be less than significant. No mitigation would be required.

Impact C-LU-1: The proposed project, in combination with cumulative projects, would not result in a significant cumulative impact related to land use and planning. (*Less than Significant*)

The cumulative context for land use effects is typically localized, within the immediate project vicinity or at the neighborhood level. Cumulative development in the project vicinity (within 0.25-mile of the project site) would include all projects listed in Section B. The cumulative development projects would introduce new infill residential, commercial, and institutional uses in the project vicinity.

The nearby cumulative development projects would not physically divide an established community by constructing a physical barrier to neighborhood access or removing a means of access. Like all projects proposed in San Francisco, the nearby cumulative development projects would be required to comply with applicable plans, policies, and regulations, including those adopted for the purpose of avoiding or mitigating an environmental effect such as the *2017 Clean Air Plan*, San Francisco's GHG Reduction Strategy, and the San Francisco Urban Forestry Ordinance.

Therefore, the proposed project, in combination with cumulative development projects, would not result in a significant cumulative impact related to the physical division of an established community or a conflict with a land use plan, policy, or regulation adopted for the purpose of mitigating an environmental impact. The cumulative impact would be less than significant. No mitigation would be required.

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact	Not Applicable
2. POPULATION AND HOUSING. Would the project:					
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☒	☐	☐
b) Displace substantial numbers of existing people or housing units, necessitating the construction of replacement housing?	☐	☐	☒	☐	☐

Impact PH-1: The proposed project would not induce substantial unplanned population growth, either directly or indirectly. (*Less than Significant*)

In general, a project would be considered growth-inducing if its implementation would result in substantial unplanned population growth or new development that might not otherwise occur without the project. The proposed project would involve construction and operation of one additional building to the existing four buildings comprising the San Francisco University High School (SFUHS) campus. Although the addition of this fifth campus building would increase SFUHS's student capacity, and student enrollment gradually would increase by 140 students (a 34 percent increase) over a 5-to-10-year period, the student increase would be distributed across all five campus buildings. To accommodate the increase in enrollment, SFUHS would employ an additional 21 teachers, 4 administrators, and 8 staff members. No new housing, which could directly induce population growth, would be developed by project implementation.

Project construction is expected to take approximately 20 months, during which time an average of 41 construction workers per day would be on site, with a maximum number of 81 construction workers per day on site during peak construction. According to the California Employment Development Department, approximately 42,400 individuals worked in construction jobs in San Francisco and San Mateo counties in 2018, and the workforce is projected to grow to approximately 43,400 construction workers by 2028.⁷ Because of the relatively large size of the regional construction workforce, construction workers for the proposed project would be expected to be drawn primarily from the local and regional construction workforce. Construction workers who do not live in the project vicinity most likely would commute from elsewhere in San Francisco or the Bay Area, rather than relocate from more distant cities or towns. Consequently, project construction would not induce population growth by attracting a substantial number of construction workers from outside the region. Project construction would not create a demand for additional housing or other facilities and services associated with growth. Construction of the proposed project would not indirectly induce substantial population growth in the project vicinity because it would not extend any roads or other infrastructure into areas where roads or other infrastructure currently do not exist.

⁷ California Employment Development Department. 2021. 2018–2028 Industry Employment Projections, San Francisco-Redwood City – South San Francisco Metropolitan Division.

The proposed project would require an increase in the SFUHS workforce by 33 additional staff members, a 22 percent increase from SFUHS's existing staff. The proposed project may indirectly induce growth by establishing new permanent employment opportunities that could stimulate population growth. The 2020 U.S. Census reported a population of 873,965 in San Francisco and 4,344 in Census Tract 133 (the Pacific Heights neighborhood) where the proposed project is located⁸. The addition of 140 students and 33 staff, assuming the students and staff currently are not residents of the city and Pacific Heights neighborhood, would increase San Francisco's and Pacific Heights' population by 0.01 percent and 3.9 percent, respectively. The potential increase in population would not be substantial. Furthermore, a portion of the additional 140 students and 33 staff are expected already to reside in San Francisco or the San Francisco Bay Area, and the project implementation would not result in their relocation from outside the region.

For these reasons, the proposed project would not substantially induce population growth, directly or indirectly. The impact related to unplanned population growth would be less than significant. No mitigation would be required.

Impact PH-2: The proposed project would not displace substantial numbers of existing people or housing units, necessitating the construction of replacement housing. (*Less than Significant*)

Implementation of the proposed project would require the displacement or relocation of several existing businesses on the project site, including a retail pet store and SFUHS's development and technology offices. However, no housing units exist on the project site. Therefore, the proposed project would not involve displacement of any existing people or housing units. As such, the proposed project would have no direct impact related to the displacement of housing units and would not necessitate construction of any replacement housing elsewhere that could result in physical environmental effects. Impacts would be less than significant.

Impact C-PH-1: The proposed project, in combination with cumulative projects, would not result in a significant cumulative impact related to population and housing. (*Less than Significant*)

The geographic scope for population and housing cumulative impact analysis encompasses the Pacific Heights neighborhood. The cumulative projects that contain housing components within this geographic scope include 3333 California Street, 726 Presidio Avenue, and 2601 Sutter Street. The cumulative projects would add approximately 751 residential units and would increase the residential population of the cumulative project area. The proposed project could have a cumulative impact in combination with these projects if the proposed project developed new housing or created new jobs that would induce housing and population growth.

As discussed under Impact PH-2, while the proposed project would require the displacement or relocation of several existing businesses on the project site, it would not displace any housing or result in the need for replacement housing.

As described under Impact PH-1, project construction would require an average of 41 workers per day and a maximum number of 81 crew members at any given time. Although construction employment associated with the proposed project would be temporary, it could coincide with construction employment generated

⁸ U.S. Census. 2020. Available at: <https://www.census.gov/quickfacts/fact/table/sanfranciscocounty/california/AGE115210?>

by the cumulative projects, depending on the timing and duration of cumulative project construction. As noted under Impact PH-1, above, the California Employment Development Department has estimated that San Francisco and San Mateo counties' combined construction workforce will grow to approximately 43,400 construction workers by 2028. The construction labor force in San Francisco County is expected to accommodate the demand for construction labor, including those related to the proposed project and cumulative projects. If non-local workers were relocated to the region during project construction and/or construction of the cumulative projects, their potential impacts on housing in the region would be minor and short-term, extending only through the duration of active construction. Therefore, the cumulative impact on population and housing related to project construction, in combination with cumulative projects, would be less than significant.

Plan Bay Area 2050 estimates that the number of households in San Francisco will increase from 366,000 in 2015 to 578,000 in 2050.⁹ The cumulative projects would add approximately 751 residential units. Considering the projected household increase of 212,000 between 2015 to 2050, the addition of 751 residential units would represent 0.4 percent of the total projected increase in households and would not be substantial. For these reasons, the proposed project would not combine with past, present, and reasonably foreseeable future projects in the project vicinity to create a significant population and housing impact.

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact	Not Applicable
3. CULTURAL RESOURCES. Would the project:					
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5, including those resources listed in article 10 or article 11 of the San Francisco Planning Code?	☐	☐	☒	☐	☐
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☒	☐	☐	☐
c) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☒	☐	☐	☐

Impact CR-1: The proposed project would not cause a substantial adverse change in the significance of a historical resource. (*Less than Significant*)

Historical resources are those properties that meet the terms of the definitions in Public Resources section 21084.1 and CEQA Guidelines section 15064.5. Historical resources include properties listed in, or formally determined eligible for listing in, the California Register of Historic Resources (California Register) or listed in an adopted local historic register. The term “local historic register” or “local register of historical resources”

⁹ Plan Bay Area 2050. 2021.. Available at: https://www.planbayarea.org/sites/default/files/FinalBlueprintRelease_December2020_GrowthPattern_Jan2021Update.pdf.

refers to a list of resources that officially are designated or recognized as historically significant by a local government pursuant to resolution or ordinance. Historical resources also include resources identified as significant in a historical resource survey, meeting certain criteria. In addition, a property that is not listed but otherwise is determined to be historically significant based on substantial evidence also would be considered a historical resource. Specifically, a property may be considered a historical resource if it meets any of the California Register criteria related to (1) events, (2) persons, (3) architecture, or (4) information potential that make it eligible for listing in the California Register, or if it is considered a contributor to an existing or potential historic district. The significance of a historical resource is materially impaired when a project “demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance.” The following discussion regarding historical resources at the project site is based on a Part I Historic Resource Evaluation completed for the building at 3150 California Street and the planning department’s response.^{10,11}

As outlined in Section A, Project Description, the project site consists of a two-story L-shaped building constructed in 1942 and an asphalt-paved parking lot. The Part I Historic Resource Evaluation for the building was completed in November 2021, and planning department staff reviewed and agreed with the findings of the evaluation. Staff subsequently issued the Part I Historic Resource Evaluation Response in November 2021, determining that the property at 3150 California Street is not eligible for listing in the California register—not individually, as a stand-alone historic district, or as a district contributor. Therefore, no historical resources are located on the project site. In addition, the project site is not directly adjacent to any known historical resources. The nearest historic district to the project site, the California Register-eligible California Street Historic District, is approximately 175 feet southeast, on the south side of California Street between Lyon Street and Baker Street. Furthermore, as discussed in Section E.7, Noise, project construction would not result in vibration levels that could affect structures in this historic district. Therefore, the proposed project would not cause a substantial adverse change in the significance of a historical resource. The impact would be less than significant. No mitigation would be required.

Impact CR-2: The proposed project could cause a substantial adverse change in the significance of an archaeological resource. (*Less than Significant with Mitigation Incorporated*)

Archeological resources are defined as those that: 1) are significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California; 2) meet the criteria for listing in the California Register; or 3) are defined as a unique archeological resource.¹² Determining the potential for encountering archeological resources is based on relevant factors that include the location, depth, and amount of excavation proposed as well as any recorded information on known resources in the area.

10 Knapp Architects Historic Preservation, Historical Resource Evaluation, 3150 California Street, San Francisco CA 94115, November 10, 2020.

11 San Francisco Planning Department, Historic Resource Evaluation Response, 3150 California Street, November 19, 2021.

12 A unique archeological resource is one for which “without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria: 1) contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information; 2) has a special and particular quality such as being the oldest of its type or the best example of its type; or 3) is directly associated with a scientifically recognized important prehistoric or historic event or person.” (CEQA section 21083.2 [g]).

Project construction would require excavation to depths ranging from 10 to 26 feet below ground surface and removal of approximately 14,000 cubic yards of soil. A preliminary archeological review was performed by a planning department staff archeologist to determine the potential for encountering archeological resources during project construction.¹³ The review determined that although no archeological resources have been recorded in the project area, and the project site is modeled as having low sensitivity for surface and buried prehistoric resources, the project site is modeled as having high sensitivity for historic-period archeological resources. The preliminary archaeological review indicates that Sanborn maps from the nineteenth and twentieth centuries show that development was present on the block of California Street where the project site is located. Therefore, historic-period archaeological resources from the nineteenth century occupation of California Street could be present in the project site.

The project site is underlain by fill and dune sand, which has the potential to contain resources related to the nineteenth century occupation of the project site. An excavation of 10 to 26 feet in depth would extend into the fill and dune sand underlying the project site and could damage or destroy unknown subsurface archeological resources, causing a significant impact on these resources if present. Implementation of Mitigation Measure M-CR-2, Archeological Monitoring would require the project sponsor to retain the services of an archeologist from the planning department's list of qualified archeological consultants to develop and implement an archeological monitoring program (AMP). With implementation of Mitigation Measure M-CR-2, the impact on archeological resources would be reduced to a less-than-significant level. The impact would be less than significant with mitigation incorporated.

Mitigation Measure M-CR-2: Archeological Monitoring

Based on the reasonable potential that archeological resources may be present within the project site, the following measures shall be undertaken to avoid any potentially significant adverse effect from the proposed project on buried or submerged historical resources. The project sponsor shall retain the services of a qualified archeological consultant having expertise in California prehistoric and urban historical archeology. The archeological consultant shall undertake an archeological monitoring program. 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. Archeological monitoring and/or data recovery programs required by this measure could suspend construction of the project for up to a maximum of four weeks. At the direction of the ERO, the suspension of construction can be extended beyond four weeks only if such a suspension is the only feasible means to reduce to a less than significant level potential effects on a significant archeological resource as defined in CEQA Guidelines Sect. 15064.5 (a)(c).

Archeological Monitoring Program. The archeological monitoring program shall minimally include the following provisions:

- The archeological consultant, project sponsor, and ERO shall meet and consult on the scope of the Archeological Monitoring Plan (AMP) reasonably prior to any project-related soils disturbing activities commencing. The ERO in consultation with the project archeologist shall determine what project activities shall be archeologically monitored. In most cases, any soils disturbing

13 San Francisco Planning Department, Environmental Planning Preliminary Archeological Review, 3150 California Street, September 1, 2021.

activities, such as demolition, foundation removal, excavation, grading, utilities installation, foundation work, driving of piles (foundation, shoring, etc.), site remediation, etc., shall require archeological monitoring because of the potential risk these activities pose to Archeological resources and to their depositional context;

- The archeological consultant shall advise all project contractors to be on the alert for evidence of the presence of the expected resource(s), of how to identify the evidence of the expected resource(s), and of the appropriate protocol in the event of apparent discovery of an archeological resource;
- The Archeological monitor(s) shall be present on the project site according to a schedule agreed upon by the archeological consultant and the ERO until the ERO has, in consultation with the archeological consultant, determined that project construction activities could have no effects on significant archeological deposits;
- The archeological monitor shall record and be authorized to collect soil samples and artifactual/ecofactual material as warranted for analysis. Ecofacts are biological or geological objects or deposits related to human activity, but not manufactured by humans. Examples of ecofactual materials include animal bones, charcoal, plants, and pollen that can tell us about past diet or environments.

Paleoenvironmental analysis of paleosols. When a submerged paleosol is identified during monitoring, irrespective of whether cultural material is present, samples shall be extracted and processed for dating, flotation for paleobotanical analysis, and other applicable special analyses pertinent to identification of possible cultural soils and for environmental reconstruction.

Discovery Treatment Determination. If an intact archeological deposit is encountered, all soils disturbing activities in the vicinity of the deposit shall cease. The archeological monitor shall be empowered to temporarily redirect demolition/excavation/pile driving/construction crews and heavy equipment until the deposit is evaluated. The archeological consultant shall immediately notify the ERO of the encountered archeological deposit. The archeological consultant shall, after making a reasonable effort to assess the identity, integrity, and significance of the encountered archeological deposit, present the findings of this assessment to the ERO.

If the ERO in consultation with the archeological consultant determines that a significant archeological resource or tribal cultural resource is present and that the resource could be adversely affected by the proposed project, the ERO, in consultation with the project sponsor, shall determine whether preservation of the resource in place is feasible. If so, the proposed project shall be re-designed so as to avoid any adverse effect on the significant archeological resource and 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 preservation plan to the planning department for review and approval. If preservation in place is not feasible, a data recovery program shall be implemented, unless the ERO determines that the archeological resource is of greater interpretive than research significance and that interpretive use of the resource is feasible.

Consultation with Descendant Communities. On discovery of an archeological site associated with descendant Native Americans, the Overseas Chinese, or other potentially interested descendant group an appropriate representative of the descendant group and the ERO shall be contacted. The

representative of the descendant group shall be given the opportunity to monitor archeological field investigations of the site and to offer recommendations to the ERO regarding appropriate archeological treatment of the site, of recovered data from the site, and, if applicable, any interpretative treatment of the associated archeological site. A copy of the Archeological Resources Report (ARR) shall be provided to the representative of the descendant group.

Archeological Data Recovery Plan. An archeological data recovery program shall be conducted in accordance with an Archeological Data Recovery Plan (ADRP) if all three of the following apply: 1) a resource has potential to be significant, 2) preservation in place is not feasible, and 3) the ERO determines that an archeological data recovery program is warranted. The project archeological consultant, project sponsor, and ERO shall meet and consult on the scope of the ADRP. The archeological consultant shall prepare a draft ADRP that shall be submitted to the ERO for review and approval. The ADRP shall identify how the proposed data recovery program will preserve the significant information the archeological resource is expected to contain. That is, the ADRP will identify what scientific/historical research questions are applicable to the expected resource, what data classes the resource is expected to possess, and how the expected data classes would address the applicable research questions. Data recovery, in general, should be limited to the portions of the historical property that could be adversely affected by the proposed project. Destructive data recovery methods shall not be applied to portions of the archeological resources if nondestructive methods are practical.

The scope of the ADRP shall include the following elements:

- Field Methods and Procedures. Descriptions of proposed field strategies, procedures, and operations.
- Cataloguing and Laboratory Analysis. Description of selected cataloguing system and artifact analysis procedures.
- Discard and Deaccession Policy. Description of and rationale for field and post-field discard and deaccession policies.
- Security Measures. Recommended security measures to protect the archeological resource from vandalism, looting, and non-intentionally damaging activities.
- Final Report. Description of proposed report format and distribution of results.
- Curation. Description of the procedures and recommendations for the curation of any recovered data having potential research value, identification of appropriate curation facilities, and a summary of the accession policies of the curation facilities.

Human Remains and Funerary Objects. The treatment of human remains and funerary objects discovered during any soil-disturbing activity shall comply with applicable State and federal laws. This shall include immediate notification of the Medical Examiner of the City and County of San Francisco. The ERO also shall be notified immediately upon the discovery of human remains. In the event of the Medical Examiner's determination that the human remains are Native American remains, the Medical Examiner shall notify the California State Native American Heritage Commission, which will appoint a Most Likely Descendant (MLD). The MLD will complete his or her inspection of the remains and make recommendations or preferences for treatment within 48 hours of being granted access to the site (Public Resources Code section 5097.98(a)).

The project sponsor and ERO shall make all reasonable efforts to develop a Burial Agreement (“Agreement”) with the MLD, as expeditiously as possible, for the treatment and disposition, with appropriate dignity, of human remains and associated or unassociated funerary objects (as detailed in CEQA Guidelines section 15064.5(d)). The Agreement shall take into consideration the appropriate excavation, removal, recordation, scientific analysis, custodianship, curation, and final disposition of the human remains and associated or unassociated funerary objects. If the MLD agrees to scientific analyses of the remains and/or associated or unassociated funerary objects, the archeological consultant shall retain possession of the remains and associated or unassociated funerary objects until completion of any such analyses, after which the remains and associated or unassociated funerary objects shall be reinterred or curated as specified in the Agreement.

If human remains cannot be permanently preserved in place, the landowner shall consult with the project archeologist, project sponsor, ERO, and the MLD on feasible recovery and treatment alternatives. The landowner shall then make all reasonable efforts to develop a Burial Agreement (“Agreement”) with the MLD, as expeditiously as possible, for the treatment and disposition, with appropriate dignity, of human remains and associated or unassociated funerary objects (as detailed in CEQA Guidelines section 15064.5(d)). Per PRC 5097.98 (c)(1), the Agreement shall address, as applicable and to the degree consistent with the wishes of the MLD, the appropriate excavation, removal, recordation, scientific analysis, custodianship prior to reinterment or curation, and final disposition of the human remains and associated or unassociated funerary objects.

Both parties are expected to make a concerted and good faith effort to arrive at an Agreement, consistent with the provisions of PRC 5097.98. However, if the landowner and the MLD are unable to reach an Agreement, the landowner, ERO, and project sponsor shall ensure that the remains and/or mortuary materials are stored securely and respectfully until they can be reinterred on the property, with appropriate dignity, in a location not subject to further or future subsurface disturbance, consistent with state law.

Treatment of historic-period human remains and of associated or unassociated funerary objects discovered during any soil-disturbing activity, additionally, shall follow protocols laid out in the project’s Archeological treatment documents, and in any related agreement established between the project sponsor, Medical Examiner and the ERO.

Archeological Public Interpretation Plan. The project archeological consultant shall submit an Archeological Public Interpretation Plan (APIP) if a significant archeological resource is discovered during a project. If the resource to be interpreted is a tribal cultural resource, the APIP shall be prepared in consultation with and developed with the participation of local Native American representatives. The APIP 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. The APIP shall be sent to the ERO for review and approval. The APIP shall be implemented prior to occupancy of the project.

Archeological Resources Report. Whether or not significant archeological resources are encountered, the archeological consultant shall submit a written report of the findings of the monitoring program to the ERO. The archeological consultant shall submit a draft Archeological Resources Report (ARR) to the ERO that evaluates the historical significance of any discovered archeological resource, describes the archeological and historical research methods employed in

the archeological testing/monitoring/data recovery program(s) undertaken, and if applicable, discusses curation arrangements. Formal site recordation forms (CA DPR 523 series) shall be attached to the ARR as an appendix.

Once approved by the ERO, copies of the ARR shall be distributed as follows: California Historical Resources Information System, Northwest Information Center (NWIC) shall receive one (1) copy and the ERO shall receive a copy of the transmittal of the approved ARR to the NWIC. The environmental planning division of the planning department shall receive one (1) bound hardcopy of the ARR. Digital files that shall be submitted to the environmental division include an unlocked, searchable PDF version of the ARR, GIS shapefiles of the site and feature locations, 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. The PDF ARR, GIS files, recordation forms, and/or nomination documentation should be submitted via USB or other stable storage device. If a descendant group was consulted during archeological treatment, a PDF of the ARR shall be provided to the representative of the descendant group.

Curation. Significant archeological collections and paleoenvironmental samples of future research value shall be permanently curated at an established curatorial facility. The facility shall be selected in consultation with the ERO. Upon submittal of the collection for curation the sponsor or archeologist shall provide a copy of the signed curatorial agreement to the ERO.

Impact CR-3: The proposed project could disturb human remains, including those interred outside of formal cemeteries. (*Less than Significant with Mitigation Incorporated*)

A U.S. Coast Survey map from 1857 indicates that the project site overlaps the eastern boundary of Lone Mountain Cemetery, approximately 770 feet from the Bush Street entrance to the cemetery. Human remains associated with the Lone Mountain Cemetery are not anticipated to be found in the project site because it falls outside the portion of the cemetery that likely was used for burial.¹⁴ However, tombstones removed from the big four¹⁵ cemeteries on Lone Mountain are scattered around the Richmond district of San Francisco and could be disturbed during excavation activities associated with the proposed project. In the event that human remains are encountered during construction, any inadvertent damage to human remains would be a significant impact. Mitigation Measure M-CR-2, Archeological Monitoring, includes the required procedures to address, protect, and treat human remains if any are discovered during construction. With implementation of Mitigation Measure M-CR-2, the impact would be reduced to a less-than-significant level. The impact would be less than significant with mitigation incorporated.

14 San Francisco Planning Department, Environmental Planning Preliminary Archeological Review, 3150 California Street, September 1, 2021.

15 Lone Mountain in the Laurel Heights and Richmond districts was home to the "Big Four" cemeteries, which included Laurel Hill to the north, Odd Fellows to the west, Masonic to the south, and Calvary to the east. All four were built between 1854 and 1865.

Impact C-CR-1: The proposed project, in combination with cumulative projects, would not result in a significant cumulative impact related to cultural resources. (*Less than Significant*)

As discussed under Impact CR-1 and Impact NO-2, the proposed project would not cause a substantial adverse change in the significance of a historical resource. The proposed project would not have setting or vibration impacts on nearby historical resources. Therefore, the proposed project would not contribute to any potential cumulative impact associated with an adverse change to a historical resource. No cumulative impact would occur.

The geographic scope for archaeological resources and human remains generally is site-specific and limited to the construction area of an individual development project. The closest cumulative project is 3333 California Street, approximately 200 feet southwest of the project site, but 3333 California Street is a sufficient distance from the project site such that cumulative impacts on archeological resources and human remains would be unlikely to occur. Therefore, the cumulative impact would be less than significant. No mitigation would be required.

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact	Not Applicable
4. TRIBAL CULTURAL RESOURCES. Would the project:					
a) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, or cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:					
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	☐	☒	☐	☐	☐
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☒	☐	☐	☐

Impact TCR-1: The proposed project could result in a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code section 21074. (*Less than Significant with Mitigation Incorporated*)

Pursuant to CEQA section 21074, tribal cultural resources are defined as sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that also are either (a) included or determined to be eligible for inclusion in the California Register or (b) included in a local register of historical resources, as defined in CEQA section 5020.1(k).

Pursuant to CEQA section 21080.3.1(d), on January 5, 2022, the planning department contacted Native American individuals and organizations in the San Francisco area, providing a description of the proposed project and requesting comments on the identification, presence, and significance of tribal cultural resources in the project vicinity.¹⁶ During the 30-day comment period, no Native American tribal representatives responded to the planning department's request for consultation.

Nonetheless, the potential to encounter unknown tribal cultural resources during excavation activities still would exist. In the event that construction activities disturb unknown archeological sites that are considered to be tribal cultural resources, any inadvertent damage would be a significant impact. Mitigation Measure M-TCR-1: Tribal Cultural Resources Archeological Resource Preservation Plan and/or Interpretive Program

¹⁶ San Francisco Planning Department, Tribal Notification Regarding Tribal Cultural Resources and CEQA, January 5, 2022.

would address impacts related to the discovery of previously unknown tribal cultural resources. With implementation of Mitigation Measure M-TCR-1, the impact on tribal cultural resources would be reduced to a less-than-significant level. The impact would be less than significant with mitigation incorporated.

Mitigation Measure M-TCR-1: Tribal Cultural Resources Program

Preservation in place. 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 (ARPP), which shall be implemented by the project sponsor during construction. The consultant shall submit a draft ARPP to Planning for review and approval.

Interpretive Program. 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, then archeological data recovery shall be implemented as required by the ERO and in consultation with affiliated Native American tribal representatives. In addition, the project sponsor shall implement an interpretive program of the tribal cultural resource in consultation with affiliated tribal representatives. A Tribal Cultural Resources Interpretation Plan (TCRIP) produced in consultation with the ERO and affiliated tribal representatives, at a minimum, and approved by the ERO would be required to guide the interpretive program. The plan shall identify, as appropriate, proposed locations for installations or displays, the proposed content and materials of those displays or installation, the producers or artists of the displays or installation, and a long-term maintenance program. The interpretive program may include artist installations, preferably by local Native American artists, oral histories with local Native Americans, cultural displays and interpretation, and educational panels or other informational displays. Upon approval by the ERO and affiliated Native American tribal representatives, and prior to project occupancy, the interpretive program shall be implemented by the project sponsor.

Impact C-TCR-1. The proposed project, in combination with cumulative projects, would not result in a significant cumulative impact on tribal cultural resources. (*Less than Significant*)

Environmental impacts on tribal cultural resources generally are site-specific and limited to the construction area of an individual development project. The nearest cumulative project is 3333 California Street, approximately 200 feet southwest of the project site. Because of the distance between the project sites, the proposed project would not combine with any cumulative projects to create a significant cumulative impact on tribal cultural resources. The impact would be less than significant. No mitigation would be required.

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact	Not Applicable
5. TRANSPORTATION AND CIRCULATION. Would the project:					
a) Involve construction that would require a substantially extended duration or intensive activity, and the effects would create potentially hazardous conditions for people walking, bicycling, or driving, or public transit operations; or interfere with emergency access or accessibility for people walking or bicycling; or substantially delay public transit?	☐	☐	☒	☐	☐
b) Create potentially hazardous conditions for people walking, bicycling, or driving or public transit operations?	☐	☐	☒	☐	☐
c) Interfere with accessibility of people walking or bicycling to and from the project site, and adjoining areas, or result in inadequate emergency access?	☐	☐	☒	☐	☐
d) Substantially delay public transit?	☐	☐	☒	☐	☐
e) Cause substantial additional vehicle miles traveled or substantially induce additional automobile travel by increasing physical roadway capacity in congested areas (i.e., by adding new mixed-flow travel lanes) or by adding new roadways to the network?	☐	☐	☒	☐	☐
f) Result in a loading deficit, and the secondary effects would create potentially hazardous conditions for people walking, bicycling, or driving; or substantially delay public transit?	☐	☐	☒	☐	☐
g) Result in a substantial vehicular parking deficit, and the secondary effects would create potentially hazardous conditions for people walking, bicycling, or driving; or interfere with accessibility for people walking or bicycling or inadequate access for emergency vehicles; or substantially delay public transit?	☐	☐	☒	☐	☐

Usually, when performing environmental review of proposed projects under CEQA, lead agencies compare the expected conditions with a proposed project to the conditions existing at the project site at the time the environmental review commences. These existing conditions are also known as the “baseline” for environmental review (CEQA Guidelines Section 15125). However, “where existing conditions change or fluctuate over time, and where necessary to provide the most accurate picture practically possible of the project’s impacts,” CEQA authorizes lead agencies to define existing conditions by referencing historic conditions. This analysis uses historical conditions, or those conditions that existed in San Francisco prior to the COVID-19 emergency as the baseline. This approach is consistent with the CEQA Guidelines and provides a more accurate, as well as a conservative approach to the environmental impacts resulting from the proposed project. The city made changes along Clay Street, within the project vicinity, as part of the temporary emergency Slow Streets Phase 3 project, which temporarily changed the physical environment in San Francisco, but this analysis does not use that changed environment in its existing

conditions. The transportation analysis was performed using field observations and surveys conducted prior to the COVID-19 local health emergency. This is a conservative approach to the traffic analysis because traffic volumes were higher prior to the COVID-19 emergency in the city than current conditions. As such, for the purpose of this environmental review, Existing Conditions for the analysis describe the physical conditions that existed prior to the COVID-19 local health emergency and implementation of the temporary emergency Slow Streets Phase 3 project.

The transportation analysis was prepared in accordance with the planning department's 2019 Transportation Impact Analysis Guidelines for Environmental Review (SF Guidelines)¹⁷ and examines the transportation-related impacts of the proposed project's construction and operational activities on hazardous conditions, accessibility, public transit, vehicle miles traveled (VMT), and loading. Supporting information is provided in the transportation study prepared for the proposed project.¹⁸

The proposed project would satisfy the eligibility criteria for a "transit-oriented infill project" under CEQA section 21099(d)(1) because it would consist of employment-center uses; would be located on an infill site; and would be located within a transit priority area.¹⁹ Therefore, the proposed project's vehicular parking impacts shall not be considered significant impacts on the environment under CEQA. Furthermore, the proposed project would not result in a substantial parking deficit because it meets the map-based screening criterion for vehicle miles traveled impacts as discussed below. Since a substantial parking deficit would not occur, the proposed project does not require a parking analysis to determine if any secondary effects would create potentially hazardous conditions for people walking, bicycling, or driving; interfere with accessibility for people walking or bicycling or inadequate access for emergency vehicles; or substantially delay public transit. For these reasons, impacts related to topic E.5(g) would be less than significant, and the topic is not discussed further in this initial study.

TRANSPORTATION SETTING

The project site is located on California Street between Presidio Avenue and Lyon Street and has 150 feet of frontage on California Street. Access to the project site by transit, on foot, or by bicycle is available from existing bus transit services, sidewalks, streets, and crosswalks near the site.

Roadways. California Street runs in an east-west direction, has two travel lanes in each direction, and is designated as a secondary arterial in the San Francisco General Plan and a commercial thoroughway in the Better Streets Plan. California Street also has a permanent transit lane in the westbound curbside travel lane. Lyon Street is a two lane-street that runs in a north-south direction and is located east of the project site. Presidio Avenue is a north-south street, west of the project site, that transitions from a two-lane street north of Sacramento Street to a four-lane street south of California Street. All four roadways have parking lanes in each direction.

17 San Francisco Planning, 2019, Transportation Impact Analysis Guidelines for Environmental Review, Available at: <https://sfplanning.org/project/transportation-impact-analysis-guidelines-environmental-review-update#impact-analysis-guidelines>

18 Fehr & Peers, 2022, UHS 3150 California Avenue Transportation Circulation Study – Final Memorandum.

19 San Francisco Planning Department, Eligibility Checklist: CEQA section 21099 Modernization of Transportation Analysis, December 7, 2021.

Bicycle Facilities. Bicycle facilities near the proposed project include two Class III²⁰ facilities on Clay Street and Presidio Avenue. California Street east of Lyon Street is on the Vision Zero High Injury Network.²¹ Clay Street between Steiner Street and Arguello Boulevard during the COVID-19 pandemic was designated a temporary Slow Street²² during the COVID-19 pandemic to provide additional space for people to walk and bike while social distancing. At this time, Clay Street’s post-pandemic future as a Slow Street is uncertain.

Pedestrian Facilities. All streets in the project vicinity have sidewalks on both sides of the street, including California Street, Sacramento Street, Lyon Street, and Presidio Avenue. Pedestrian crosswalks and American Disabilities Act-access curb ramps are provided at the signalized intersections at California Street and Presidio Avenue and at California Street and Lyon Street.

Transit. Primary public transit to the project site is provided by Muni bus service. Muni operates three bus routes (1-California, 24-Divisadero, and 43-Masonic) in the vicinity of the project site. The 1-California runs every 10 mins, and the 24-Divisadero and 43-Masonic run every 10 to 20 minutes. There is a Muni bus stop for the 1-California route on the north side of California Street at Presidio Avenue, approximately 175 feet west of the project site. A Muni bus stop for the 43-Masonic route is located on the west side of Presidio Avenue at California Street, approximately 150 feet west of the project site. Additionally, there is a permanent transit lane in the westbound curbside travel lane on California Street.

SFUHS contracts a school bus, shared with two other independent schools, for students traveling from Marin County. Approximately 10 students are subscribed to take the Marin County bus, and additional students can purchase tickets for occasional use. The drop-off location for the bus is on Washington Street in front of the Middle Lower Building at the existing passenger loading zone (white curb). The bus drops students off Monday through Thursday at 8:15 a.m. and Friday at 8:25 a.m. Return service occurs at two different times to accommodate after-school athletics. The departure of the afternoon buses is at 3:50 p.m. and 6:20 p.m. Additionally, students participating in after-school sports activities may take school vans or buses to offsite locations, such as Paul Goode Field.

Loading. There are no loading zones on the block where the project site is located. Currently, SFUHS has two passenger loading zones on Washington Street, at the entrances to the Middle and Lower buildings. The school encourages student pick-ups and drop-offs at the 23-foot-long passenger loading zone on the north side of Washington Street, at the entrance to the Middle Building. The SFUHS school bus drops off and picks up students at the 23-foot-long white passenger loading zone on the south side of Washington Street, at the entrance to the Lower Building. Use of the loading zone at the Lower building is generally limited to SFUHS bus operations.

PROJECT TRIP GENERATION

As described in section A, Project Description, the proposed project would add academic facilities, a small dining facility, a new gymnasium, and common gathering spaces at 3150 California Street. The proposed project would also involve gradually increasing the school’s enrollment from 410 students to 550 students over approximately five to 10 years and gradually increasing the school’s staff from 147 members to 180 staff

20 Class III facilities consist of designated and signed bicycle routes where bicyclists share the roadway with vehicles. They may or may not be marked with arrows and are usually signed.

21 <https://sfgov.maps.arcgis.com/apps/webappviewer/index.html?id=fa37f1274b4446f1bddd7bdf9e708ff>

22 <https://www.sfmta.com/projects/slow-streets-program>

over the same period. With the introduction of the 3150 California Street building, the school will develop two distinct activity nodes: one around the existing Upper building on Jackson Street and Middle and Lower buildings on Washington Street and one around the existing South building on Sacramento Street and the proposed California Street site.

Estimated weekday daily and afternoon *peak-hour project person-trip generation*²³ for student and faculty/staff was performed pursuant to methodologies outlined in the SF Guidelines. Table 3 presents student-trip generation under existing and proposed conditions during the morning and afternoon peak periods. During the morning peak period, approximately 199 students (65 percent) travel to SFUHS by vehicle, 63 students (20 percent) walk, and 45 students (15 percent) take Muni. During the afternoon peak period, approximately 30 percent of students travel from SFUHS by vehicle, 38 percent by walking, and 32 percent by Muni or school bus. Table 4 presents faculty/staff-trip generation during the same peak periods. Approximately 60 to 65 percent of faculty/staff drive to campus, and approximately 15 to 20 percent take public transportation.

Table 5, p. 40, presents the estimated number of student and faculty/staff vehicle trips generated under existing and proposed conditions during the morning and afternoon peak periods. Overall, the project would generate approximately 59 additional vehicle trips during the morning peak hour and 34 additional vehicle trips during the afternoon peak hour, the majority of which are student trips. Trip generation shows the estimated number of student and faculty/staff vehicle trips for the maximum increase in enrollment (550 students) and faculty (180 staff); however, the estimated number of student vehicle trips would increase proportionally to the gradual increase of student enrollment over approximately five to ten years. The detailed methodology and results for the travel demand is included in the *travel demand memorandum*.²⁴

The new facilities on California Street would shift approximately 50 percent of the existing loading demand for students and faculty from the north side of Washington Street to the southern part of the campus. The length of the proposed project frontage (approximately 152 feet along California Street) would include a 132-foot white-color curb and two 10-foot curb ramps to accommodate this new passenger loading during school loading hours.²⁵ The proposed 152-foot-long loading zone on California Street would serve this pick-up/drop-off demand for the southern activity node of the campus while the existing loading zone on the north side of Washington Street would continue to serve the northern activity node of the campus. The Marin County bus would continue to drop-off and pick-up students at the current bus loading zone, on the south side of Washington Street. School buses associated with after-school athletic activities would also use the southern Washington Street loading zone during the afternoon pick-up period. The average and maximum queue lengths on northern Washington Street and California Street during the peak 15 minutes of the morning and afternoon peak periods are shown for existing and proposed conditions in Table 6, p. 40 and Table 7, p. 40. The proposed loading demand and queue lengths were estimated by extrapolating the observed loading demand and queue lengths and splitting the demand evenly between Washington Street and California Street to reflect the anticipated even split in classrooms and other activity generators.

23 Fehr & Peers, 2022, UHS 3150 California Avenue Transportation Circulation Study – Final Memorandum.

24 Ibid.

25 The current passenger loading hours at the Washington Street loading zone are between 7:30 and 9:00 a.m. and between 2:00 and 5:00 p.m. on weekdays. The proposed loading zone on California Street would be active during the same timeframes.

Table 3 Student Person-Trip Generation

Mode of Transportation	Existing		Proposed		Net changes	
	Morning peak hour	Afternoon peak hour	Morning peak hour	Afternoon peak hour	Morning peak hour	Afternoon peak hour
Dropped off / picked up (includes taxi/TNC)	193	71	259	96	66	25
Drove self	6	12	8	17	2	5
Muni	45	65	61	88	16	23
School bus (from Marin)	-	16	-	21	-	5
Bicycle	-	-	-	-	-	-
Walk	63	99	85	133	22	34
Total	308	264	413	354	105	90

SOURCES: Fehr & Peers, 2022

NOTES:

- ^a The morning peak hour is 8:00 a.m., and the afternoon peak hour is 2:45 to 3:45 p.m.
- ^b The travel demand estimates do not include a credit to subtract the existing vehicle trips with the office and retail uses at 3150 California Street from the future roadway volumes.

Table 4 Faculty/Staff Person-Trip Generation

Mode of Transportation	Existing		Proposed		Net changes	
	Morning peak hour	Afternoon peak hour	Morning peak hour	Afternoon peak hour	Morning peak hour	Afternoon peak hour
Auto	31	53	38	65	7	12
Dropped off / picked up (includes taxi/TNC)	2	-	3	-	-	-
Muni	11	11	13	13	2	2
Bicycle	2	6	3	8	-	1
Walk	7	4	8	5	1	1
Total	53	75	64	91	12	17

SOURCES: Fehr & Peers, 2022

NOTES:

- ^a The morning peak hour is 8:00 a.m., and the afternoon peak hour is 2:45 to 3:45 p.m.
- ^b The travel demand estimates do not include a credit to subtract the existing vehicle trips with the office and retail uses at 3150 California Street from the future roadway volumes.

Table 5 **Vehicle-Trip Generation**

Time Period	Vehicle trip generation		Existing (410 students)		Proposed (550 students)		Net changes		
	Students	Faculty/staff	Students	Faculty/staff	Students	Faculty/staff	Students	Faculty/staff	Total
Morning peak hour 8:00–9:00 a.m.	0.38	0.19	155	28	208	34	53	6	59
Afternoon peak hour 2:45–3:45 p.m.	0.17	0.30	70	44	94	53	24	10	34

SOURCES: Fehr & Peers, 2022

NOTES:

- ^a The travel demand estimates do not include a credit to subtract the existing vehicle trips with the office and retail uses at 3150 California Street from the future roadway volumes.

Table 6 **Morning Peak-Hour Loading Demand (Peak 15 Minute Queues)**

Location	Loading zone	Morning Peak (8 to 9 a.m.) 15 Minute queue length ^a average (maximum)			
		Existing (410 students)		Proposed (550 students)	
	Length (feet)	Number of vehicles	Queue Length (feet)	Number of vehicles	Queue Length (feet)
Washington Street	23	5 (9)	110 (198)	4 (6)	88 (132)
California Street	132	n/a	n/a	4 (6)	88 (132)

SOURCES: Fehr & Peers, 2022

NOTES:

- ^a The new California Street loading zone would be 152 feet and accommodate passenger loading for six vehicles, two of which would be accessible spaces. The loading zone would include 132 feet of white curb and two 10-foot curb ramps.
- ^b Queue lengths rounded up to the nearest whole vehicle and based on an average vehicle length of 22 feet, consistent with SFMTA standards.
- ^c Travel demand does not account for existing vehicle trips or loading associated with the office and retail uses at 3150 California Street.

Table 7 **Afternoon Peak-Hour Loading Demand (Peak 15 Minute Queues)**

Location	Loading zone	Afternoon Peak (2:45 to 3:45 p.m.) 15 minute queue length ^a average (maximum)			
		Existing (410 students)		Proposed (550 students)	
	Length (feet)	Number of vehicles	Queue Length (feet)	Number of vehicles	Queue Length (feet)
Washington Street	23	4 (7)	88 (154)	3 (5)	66 (110)
California Street	132	N/A	N/A	3 (5)	66 (110)

SOURCES: Fehr & Peers, 2022

NOTES:

- ^a The new California Street loading zone would be 152 feet and accommodate passenger loading for six vehicles, two of which would be accessible spaces. The loading zone would include 132 feet of white curb and two 10-foot curb ramps.
- ^b Queue lengths rounded up to the nearest whole vehicle and based on an average vehicle length of 22 feet, consistent with SFMTA standards.
- ^c Travel demand does not account for existing vehicle trips or loading associated with the office and retail uses at 3150 California Street.

Impact TR-1: The proposed project would not involve construction that would require a substantially extended-duration or intensive activity, where the secondary effects would create potentially hazardous conditions for people walking, bicycling, or driving or for public transit operations, interfere with emergency access or accessibility for people walking or bicycling, or substantially delay public transit. (*Less than Significant*)

The SF Guidelines Construction Analysis Screening Criteria Checklist²⁶ sets forth screening criteria for types of construction activities that typically would not result in significant construction-related transportation effects based on project-site context and construction duration and magnitude. The proposed project would result in approximately 14,000 cubic yards of material removed from the project site, which is less than the site-context screening criteria threshold of 20,000 cubic yards. Additionally, the project's construction is not expected to require substantial extended-duration or intense activity, as described below.

During the approximately 20-month construction period, there would be a flow of construction-related trucks and vehicles to and from the project site, which could result in temporary lower capacities of local streets due to the slower movement and larger turning radii of trucks. The number of construction trucks traveling to and from the project site would vary depending on the type of construction activity. Daily construction truck trips would average approximately 8 vendor trips per day and approximately 33 haul truck trips per day during the shoring and excavation phase of construction. Construction activities would also generate construction worker trips and temporary demand for vehicle parking and public transit. Construction workers primarily would be working onsite between 7 a.m. and 3:30 p.m., with most workers arriving to the project site before the morning-commute peak hour and departing before the afternoon-commute peak hour. To reduce worker-vehicle demand, construction workers would be encouraged to carpool, walk, bike, or take public transportation to the project site. Truck-haul trips generally would be confined to the midday period, between the morning and afternoon peak-hour commute periods.

The project site has limited space for vehicle and equipment staging, and therefore most staging would occur offsite and in limited areas onsite. The existing curb cuts and sidewalk area along the southern boundary of the new building would be used for truck ingress/egress and the staging of dumpsters, construction offices, and a laydown area. The sidewalk would be temporarily closed to pedestrians during construction; however, a pedestrian walkway would be constructed within the existing parking lane along the 3150 California Street frontage. Project construction may require the closing of the right westbound travel lane on California Street to accommodate the delivery of large construction equipment (e.g., a crane) and excavation activities. Lane closures would be temporary, and emergency access and public transit access would be maintained throughout construction.

The SFMTA's San Francisco Regulations for Working in San Francisco Streets, also known as the Blue Book, sets the rules and guidance for work within San Francisco streets. The Blue Book is a manual for all City agencies (San Francisco Public Works [public works], SFMTA, the San Francisco Public Utilities Commission, the Port of San Francisco [the port], etc.), utility crews, private contractors, and others who work in San Francisco's public rights-of-way. The purpose of the Blue Book is to ensure that work in public-rights-of-way is performed safely and in a manner that results in the least possible interference with people walking, bicycling, taking transit, or driving, and transit operations. Prior to construction of the proposed project the

²⁶ San Francisco Transportation Impact Analysis Guidelines, Appendix N Construction, October 2019, available at: <https://sfplanning.org/project/transportation-impact-analysis-guidelines-environmental-review-update#impact-analysis-guidelines>

project sponsor and construction contractor(s) would be required to meet with public works and SFMTA staff to develop and review the project's construction plans in preparation for obtaining relevant construction permits. This may include reviewing truck routing plans for the disposal of excavated materials, material delivery and storage, as well as staging for construction vehicles. Per the blue book, construction activities that affect travel lanes or transit lane on California Street are restricted between 4 p.m. and 6 p.m. on the north side and 7 a.m. and 9 a.m. on the south side.²⁷ Coordination with SFMTA and public works would be required to temporarily relocate the pedestrian right-of-way and Muni overhead lines during construction. Depending on SFMTA plan review requirements, the proposed project may be required to consult with SFMTA Muni operations before the start of construction to address potential effects on nearby transit operations.

Overall, construction activities would be temporary (approximately 20 months) and would not involve a substantially intense activity and would be conducted in accordance with city requirements. Based on the above, the proposed project would not involve construction that would require a substantially extended duration or intensive activity, and the secondary effects would not create potentially hazardous conditions for people walking, bicycling, or driving or for public transit operations. The impact would be less than significant.

Impact TR-2: The proposed project would not create potentially hazardous conditions for people walking, bicycling, or driving or for public transit operations. (*Less than Significant*)

DRIVING AND TRANSIT OPERATIONS

The primary point of vehicular ingress and egress to the project site would be provided via California Street. California Street has two travel lanes in each direction, a permanent transit lane in the westbound curbside travel lane, and on-street parallel parking on both sides. The proposed project would remove the two existing curb cuts and install a 152-foot-long passenger loading zone along the project site's California Street frontage for student pick-up and drop-off. The loading zone would include 132 feet of white curb and two 10-foot curb ramps. As presented in Table 5, p. 40, with operation of the proposed project, the SFUHS campus would generate approximately 208 morning-peak-hour and 94 afternoon-peak-hour student-vehicle trips and 34 morning-peak-hour and 53 afternoon-peak-hour faculty-vehicle trips. This equates to a net increase of 53 student and six faculty new vehicle trips during the morning peak hour and 24 student and 10 faculty new vehicle trips during the afternoon peak hour compared to current operations at the SFUHS campus. As discussed above, the new net change of vehicle trips would be split approximately evenly between the existing Washington Street loading area (north side) and the proposed project loading area on California Street. The queue lengths on Washington Street and California Street during the peak morning and afternoon periods are shown in Table 6, p. 40, and Table 7, p. 40. This amount of vehicle traffic equates to a net increase in vehicle traffic of less than one vehicle per minute, which would be split approximately evenly between two activity nodes and distributed across the surrounding grid network. This would not represent a substantial number of additional project vehicle trips that would result in hazardous conditions.

As shown in, p. 39 the estimated length of the average and maximum morning and afternoon queues for project passenger loading on California Street would be less than or equal to the length of the proposed 152-foot-long passenger loading zone along the project frontage (as shown in Figure 9 and Figure 10). The

27 San Francisco Municipal Transit Agency, 2021. Regulations for Working in San Francisco Streets

proposed loading zone would be able to accommodate the passenger-loading demand on California Street. Because there is no loading deficit at the California Street loading zone, the proposed project would not result in a significant loading deficit that could create potentially hazardous conditions for people walking, bicycling, or driving or for public transit operations. Removal of the existing curb cuts would reduce potential conflicts between vehicles and pedestrians since vehicles associated with the existing uses at the project site would no longer be entering or leaving the site.

Although the proposed project would reduce the existing loading demand on the north side of Washington Street by shifting approximately 50 percent of the loading demand to California Street, the estimated maximum peak hour passenger-loading demand on the north side of Washington Street would continue to exceed the existing 23-foot-long passenger loading zone's capacity under plus-project conditions by 109 feet (five vehicles) during the peak morning period and by 87 feet (four vehicles) during the afternoon peak period, compared with a loading demand exceedance of 175 feet (eight vehicles) and 129 feet (six vehicles), respectively, under existing conditions. This results in double-parking in the westbound travel lane on Washington Street. No transit lines or bicycle facilities operate in the project vicinity on Washington Street or Baker Street. Under existing conditions, the maximum vehicle queues on the north side of Washington Street do not extend into the intersection with Baker Street, and therefore do not create hazards such as vehicle conflicts or blocking of sightlines by extending into the intersection. Washington Street traffic volumes are low during peak loading periods and a monitor would be present at the midblock crosswalk to guide vehicle traffic and students. Additionally, SFUHS's traffic management guidelines instruct those dropping students off at the school to not leapfrog the queue. Therefore, double-parking in the travel lane does not lead to hazardous conditions from vehicle conflicts or blocking of sightlines at the midblock crosswalk. The proposed project would reduce the existing loading demand on the north side of Washington Street and would not exacerbate the existing conditions.

A School Drop-off and Pick-up Management Plan was developed to guide the proposed project's student loading activities and develop strategies to minimize impacts to the California Street and Washington Street travel lanes. As described in the plan, two staff monitors would manage morning drop-off and afternoon pick-up operations during the peak 15 to 30 minutes of each loading period at the new loading zone on California Street. One staff monitor would be positioned at either end of the loading zone to direct vehicles. The staff monitors would direct vehicles to circle the block or an offsite waiting area if loading demand were to exceed the available curb space and vehicle queues were to spill out into the travel lane. Positioning staff monitors at the loading zone during the peak period would ensure that the loading zone is used effectively and that the queue does not spill into the California Street travel lane or block public transit or the adjacent driveway at 3110 California Street. The proposed project would not create potentially hazardous conditions for people driving or for public transit. The impact would be less than significant. However, the project sponsor would be required to implement Improvement Measure TR-1, which would further reduce the less than significant impacts on loading conditions.

WALKING

Pedestrian access to the main entry and lobby of the proposed building would be on California Street. During the morning and afternoon peak hours, the proposed project would add 23 morning and 35 afternoon new student and faculty walking trips. These trips would be primarily along California Street and Lyon Street. The additional walking trips would be accommodated by the sidewalks and crosswalks at intersections without creating overcrowded conditions that could lead to potentially hazardous conditions. Crossing monitors are also located midblock on Washington Street and at the intersection of Lyon Street and Clay Street during

school operations to manage traffic while students and faculty walk to classes in the various SFUHS campus buildings. Therefore, the proposed project would not create potentially hazardous conditions for people walking.

BICYCLE

Bicycle access to the project site would be via designated bicycle routes on Presidio Boulevard or Clay Street. The proposed project would not add any morning-peak-hour bicycle trips and would add one afternoon-peak-hour bicycle trip. The addition of one bicycle trip would not represent a substantial increase in bicycle traffic nor result in potential conflicts with vehicles and transit along Presidio Boulevard, Clay Street, or other surrounding streets. The proposed project would not create potentially hazardous conditions for people bicycling.

In addition, the proposed project would not alter the existing street grid, reconfigure the intersections near the project site, or introduce other physical features that would create potentially hazardous conditions for people driving, walking, or bicycling or for public transit operations. The impact would be less than significant.

Impact TR-3: The proposed project would not interfere with accessibility of people walking or bicycling to and from the project site and adjoining areas or result in inadequate emergency access (*Less than Significant*)

As discussed above, the proposed project would generate a net increase of 59 new vehicle trips during the morning peak hour and 34 new vehicle trips during the afternoon peak hour for students and faculty. The proposed project would also add 23 morning-peak-hour and 35 afternoon-peak-hour student and faculty walking trips and one afternoon faculty bicycle trip. The proposed project does not involve substantial changes to the street network that would interfere with accessibility for people walking or bicycling to and from the project site or result in inadequate emergency access.

FIGURE 9 MORNING STUDENT DROP-OFF DEMAND



Sources: Fehr & Peers, 2022, University High School 3150 California Avenue Transportation Circulation Study – Final Memorandum

Figure 10 AFTERNOON STUDENT DROP-OFF DEMAND



Sources: Fehr & Peers, 2022, University High School 3150 California Avenue Transportation Circulation Study - Final Memorandum

EMERGENCY ACCESS

The proposed project would continue to accommodate emergency access to the project site via California Street. Project operations would not change any emergency access routes compared to existing conditions. Although the proposed project would generate additional vehicle trips in the area, the increase in vehicle trips would not be substantial enough to impede or hinder the movement of emergency vehicles in the project area. Furthermore, the proposed project would not introduce any new design features that could impede or hinder the movement of emergency vehicles in the project area. The proposed project would result in less-than-significant impacts related to accessibility for emergency service providers

PEDESTRIAN AND BICYCLE ACCESS

Existing student pedestrian activity in the project vicinity occurs along Lyon Street, Sacramento Street, Washington Street, and Jackson Street. Pedestrian access would occur from Presidio Avenue and Lyon Street during morning and afternoon peak hours. Pedestrian access to the project site would occur primarily from Lyon Street during school hours as this is the closest pedestrian route from the other SFUHS campus buildings to the project site. As noted above in the Transportation Setting, Class II bicycle facilities are currently located on Presidio Boulevard and Clay Street west and north of project site, respectively. The proposed project would generate one afternoon-peak-hour bicycle trip, and the low number of bicycle trips would not substantially conflict with or result in unsafe conditions to nearby bicycle paths or facilities. Implementation of the proposed project would not remove or change any of the existing bicycle facilities. The proposed project would also not make changes to the right-of-way that would conflict with nearby pedestrian or bicycle facilities. Therefore, the proposed project would result in less than significant impacts related to accessibility for people walking or bicycling to and from the project site.

Impact TR-4: The proposed project would not substantially delay public transit. (*Less than Significant*)

The SF Guidelines set forth a screening criterion for projects that would typically not result in significant public transit delay effects. During the morning and afternoon peak period, the proposed enrollment increase is estimated to add an additional 53 peak morning vehicle trips and 24 peak afternoon student vehicle trips, which would be split between the school's two loading areas. The approximately 39 peak vehicle trips added to California Street is much lower than the department's threshold for quantitative transit delay analysis (approximately 300 vehicle trips) and would therefore be unlikely to delay public transit.²⁸ The proposed project would not add a substantial number of new peak hour vehicle trips to roadways with transit service. Thus, the proposed project's impact on transit service delay would be less than significant.

28 SF Planning Department, Transportation Impact Analysis (TIA) Guidelines. Available at: http://default.sfplanning.org/publications_reports/TIA_Guidelines.pdf. Appendix I of the TIA Guidelines describes the transit delay screening criteria.

Impact TR-5: The proposed project would not cause substantial additional vehicle miles traveled or substantially induce additional automobile travel by increasing physical roadway capacity in congested areas or by adding new roadways to the network. (*Less than Significant*)

CEQA statute and CEQA guidelines identify vehicle miles traveled (VMT) efficiency metrics as potential metrics to evaluate transportation impacts. *VMT per person* (or per capita) is a measurement of the amount and distance that a resident, an employee, or a visitor drives, accounting for the number of passengers within a vehicle. In general, higher VMT areas are associated with more air pollution, including GHG emissions and energy use, than lower VMT areas. Many interdependent factors affect the amount and distance a person may drive. In particular, the built environment affects how many places a person can access within a given distance, time, and cost, using different ways of travel (e.g., private vehicle, public transit, bicycling, walking). Typically, low-density development at great distances from other land uses and in areas with few options for ways of travel provides less access than locations with high density, mix of land uses, and numerous ways of travel. Therefore, low-density development typically generates more VMT compared to a similarly sized development in urban areas, such as the project site.

Given these travel behavior factors, on average, people living or working in San Francisco contribute to lower VMT per person than people living or working elsewhere in the nine-county San Francisco Bay Area region. In addition, on average, people living or working in some areas of San Francisco result in lower VMT per person than people living or working elsewhere in San Francisco.

San Francisco displays different amounts of VMT per capita geographically through *transportation analysis zones* (TAZs). TAZs are used in transportation planning models for transportation analysis and other planning purposes. The San Francisco County Transportation Authority uses the San Francisco Chained Activity Modeling Process to estimate VMT by private automobiles and for-hire vehicles for different TAZs.²⁹ The transportation authority calibrates travel behavior in the model based on observed behavior from the California Household Travel Survey 2010–2012. The model uses a synthetic population, which is a set of individual actors that represents the Bay Area’s actual population, who make simulated travel decisions for a complete day. The project site is located within TAZ 843.

Office-type projects are used as a proxy for institutional uses in calculating VMT. The proposed project falls within the map-based screening area for office projects. The SF Guidelines uses a map-based screening criterion to identify the locations of office land use projects that would not exceed this VMT quantitative threshold of significance. The SF Guidelines identify the following quantitative thresholds of significance for office projects to determine whether the proposed project would generate substantial additional VMT if it exceeded the regional VMT per employee minus 15 percent. The nine-county San Francisco Bay Area average daily regional VMT per employee is 19.1. Thus, the threshold of significance is 16.2. Table 8 presents the existing average daily VMT per employee for office uses in TAZ 843, which is approximately 37.1 percent lower than the regional Bay Area average. The proposed project would have a VMT of more than 15 percent below existing regional averages and would not contribute to any substantial cumulative increase in VMT. For the reasons described above, the proposed project impacts related to VMT and induced automobile travel would be less than significant and no mitigation would be required.

²⁹ San Francisco Planning Department, 2019, Transportation Impact Analysis Guidelines, Appendix L Vehicle Miles Traveled (VMT)/ Induced Automobile Travel

Table 8 Existing Average Daily Vehicle Miles Traveled in TAZ 843

Land use	Bay Area regional average	Bay Area regional average minus 15 percent (significance threshold)	TAZ 843
Office	19.1	16.2	10.19

SOURCES: Eligibility Checklist: CEQA Section 21099 Modernization of Transportation Analysis, 2021.

Impact TR-6: The proposed project would not result in a loading deficit, the secondary effects of which would create potentially hazardous conditions for people walking, bicycling, or driving or substantially delay public transit. (*Less than Significant*)

The new facilities on California Street would shift approximately 50 percent of the loading demand for students from the northern side of Washington Street to the southern part of the campus, mirroring the distribution of classrooms and other activity centers across the campus. As stated under Impact TR-2, the passenger loading demand on California Street can be accommodated by the proposed 152-foot-long passenger loading zone and therefore, the proposed project would not generate vehicle queues that could substantially delay public transit or create potentially hazardous conditions for people walking, bicycling, or driving. The SFUHS Drop-off and Pick-up Management Plan would be implemented to ensure the loading zone is used effectively and that the queue does not spill into the California Street transit lane or block public transit. Although the loading demand on the northern side of Washington Street would continue to exceed the 23-foot-long passenger loading zone under the proposed project, no transit lines or bicycle facilities operate in the vicinity of Washington Street, and vehicle queues would not extend into or block the intersection of Washington Street and Baker Street under plus-project conditions. Additionally, the proposed project would reduce the existing loading demand on Washington Street by shifting approximately 50 percent of the loading demand to California Street and would not result in the loading deficit on Washington Street. Additionally, the School Drop-off and Pick-up Management Plan would be implemented at the northern Washington Street load zoning zone. For these reasons, the proposed project would not result in a loading demand that could cause a loading deficit. The impact would be less than significant. However, the project sponsor would be required to implement Improvement Measure TR-1, which would further reduce the less than significant impacts on loading conditions.

Improvement Measure TR-1: Loading Demand Management

The property owner or their designee will prevent the vehicle queues at the California Street loading zone and northern Washington Street loading zone from spilling into the adjacent travel lane and from backing up into nearby property frontages or intersections. A vehicle queue is defined as one or more vehicles waiting to access the proposed project's passenger loading zone and blocking any portion of any public right-of-way for a combined two minutes during the peak consecutive 60 minutes for the adjacent public right-of-way or a combined 15 minutes between the hours of 6 a.m. and 10 p.m.; and for at least three 24-hour periods in any consecutive seven-day period. If, despite implementation of the strategies described in the School Drop-off and Pick-up Management Plan, vehicle queues at the loading zones on California Street or northern Washington Street do spill into the adjacent travel lane, UHS will manage demand by reducing or shifting loading demand associated with student drop-offs and pickups. This would be accomplished by implementing the following additional operational improvements:

- Coordinate with SFMTA and UHS neighbors to identify additional ways to manage student loading activities, such as:

Submitting an application to the SFMTA Color Curb Program to extend the northern loading zone on Washington Street along UHS frontage or the passenger loading zone on California Street to better accommodate existing and existing plus project loading queues or

Identifying a designated location away from the California Street loading zone and northern Washington Street loading zone where vehicles can wait to enter the loading zones if they are full;

- Assign additional staff monitors at the next downstream intersection from the California Street loading zone and the northern Washington Street loading zone to observe the potential for queues and direct vehicles elsewhere to avoid queues from occurring and blocking travel lanes, intersections, or driveways; and
- Employ real-time shared pick-up/drop-off information to reduce vehicle dwell times at the California loading zone and northern Washington Street loading zone (e.g. an app for parents or guardians to indicate what time they will be dropping off and picking up their student).

In addition to the operational improvements described above, the following strategies would help the school reduce overall vehicle loading demand, and would be implemented when the above strategies are not sufficient for managing loading operations:

- Establish a carpool-matching system to help parents/guardians with carpooling;
- Increase education, marketing, or financial incentives to make non-automobile modes more attractive and encourage more students to walk, bike, or take transit to school;
- Stagger pick-up and drop-off for different classes (e.g. first, second, third-, and fourth-year students start classes and are required to be dropped off at staggered times);
- Promote a flexible, as needed, extended day program; and
- Shift the location of morning or afternoon classes or activities to better balance the loading demand between loading zones.

If the Planning Director, or their designee, suspects that a vehicle queue is occurring, the Planning Department will notify the property owner in writing. Upon request, the property owner will hire a qualified transportation consultant to evaluate the conditions at the site for no less than seven days. The consultant will prepare a monitoring report to be submitted to the Planning Department for review. If the Planning Department determines that a recurring queue does exist, the property owner will have 90 days from the date of the written determination to select from the measures described above and implement them.

Impact C-TR-1. The proposed project, in combination with cumulative projects, would not result in a significant cumulative impact on transportation and circulation. (*Less than Significant*)

The cumulative transportation impact assessment includes the following nearby cumulative development projects: 3333 California Street, 726 Presidio Avenue, and 2601 Sutter Street. The 3333 California Street

project would generate 425 net new morning and 456 net new afternoon-peak-hour vehicle trips³⁰. The 726 Presidio Avenue³¹ and 2601 Sutter Street³² cumulative projects did not require transportation studies because these cumulative projects would provide a total of seven residential units and 10 off-street parking spaces in the buildings, and therefore would not contribute substantial net new vehicle trips to the area.

CONSTRUCTION

The construction cumulative analysis considers construction-phase traffic of the proposed project and cumulative projects where construction schedules would overlap. The geographic scope for potential cumulative impacts includes roadways where the cumulative projects would have the potential for overlapping effects with the proposed project (i.e., use of same roadways). Construction of the proposed project could overlap with the construction of the following projects: 3333 California Street, 726 Presidio Avenue, and 2601 Sutter Street. Construction of the proposed project and cumulative projects could result in a significant cumulative transportation impact if combined construction activities would result in potentially hazardous conditions or interfere with access for people walking, bicycling, or driving, or for transit operations, and emergency vehicles in areas where construction-related traffic congestion would overlap and road closures would overlap on nearby roadways.

As discussed under Impact TR-1, the sidewalk and right westbound transit lane on California Street may be temporarily closed during construction. Construction staging would occur onsite and would not require lane closures. A pedestrian walkway would be constructed within the existing parking spaces at the southern boundary of the project site to maintain access to the sidewalk during construction. The proposed project would not contribute to a cumulative impact on people bicycling or walking because public access to bicycle lanes and sidewalks would be maintained during construction.

Given required compliance with SFMTA blue book regulations and the San Francisco Public Works Code concerning construction activities within the public right-of-way, construction activities associated with cumulative projects combined with that of the proposed project would not result in cumulative construction-related transportation impacts. In addition, the proposed project and cumulative projects would also coordinate with SFMTA and other appropriate agencies to develop traffic management measures to reduce traffic congestion during construction. Thus, no significant cumulative construction-related transportation impacts would occur, and this impact would be less than significant. No mitigation would be required.

HAZARDOUS CONDITIONS

Future land use development anticipated under cumulative conditions is not expected to result in substantial changes to traffic circulation that could lead to potentially hazardous conditions for people walking, bicycling, driving, or riding transit. Under cumulative conditions, trips by people walking, bicycling, or driving on the surrounding street network would increase due to the proposed project, other development projects identified above, and growth elsewhere in the city and region. This would generally be expected to lead to an increase in the potential for conflicts between people driving, people walking or

30 San Francisco Planning Department, 2018, Draft Environmental Impact Report Volume 1

31 San Francisco Planning Department, 2018, 726 Presidio Avenue Environmental Evaluation

32 San Francisco Planning Department, 2021, 2601 Sutter Street CEQA Categorical Exemption Determination.

bicycling, and public transit operations. However, a general increase in cumulative travel by all modes in and of itself would not be considered a potentially hazardous condition.

Cumulative projects, including the proposed project, would be required to be consistent with city policies' design standards, including the Better Streets Plan, and therefore would not create potentially hazardous conditions. Thus, no significant cumulative impacts related to potentially hazardous conditions would occur and the impact would be less than significant.

ACCESSIBILITY

Cumulative projects and citywide growth would contribute to increasing the number of people walking, bicycling, driving, or riding transit on streets surrounding the project site under cumulative conditions.

The 3333 California Street project could result in an increase in vehicle, pedestrian, and bicycle traffic within the immediate vicinity of the project site. The 3333 California Street project would improve pedestrian and bicycle accessibility by including numerous sidewalks, traffic control modifications, intersection crossing treatments, on-site bicycling facilities and parking, offsite bicycle parking, and streetscape modifications. The 3333 California Street project would not impede accessibility for pedestrians or bicyclists or create conditions inadequate for emergency access.

The 726 Presidio Avenue and 2601 Sutter Street cumulative projects would not affect vehicular circulation in the project vicinity and would not impede emergency access. The 726 Presidio Avenue and 2601 Sutter Street cumulative projects would establish a total of seven residential units and 10 off-street parking spaces in the buildings. The cumulative projects are not anticipated to result in substantial changes to pedestrian or bicycle facilities along the project frontages on Presidio Avenue and Sutter Street that could interfere with or hinder pedestrian access to and from the project site and adjoining areas. As a result, cumulative projects would not impede accessibility for pedestrians or bicyclists or create conditions inadequate for emergency access, and the cumulative impact would be less than significant.

PUBLIC TRANSIT

As discussed under Impact TR-4, the SF Guidelines set forth a screening criterion for projects that would typically not result in significant public transit delay effects. The proposed project would generate 59 net new vehicle trips during the morning peak hour and 34 total net new vehicle trips during the afternoon peak hour, which is less than the screening criterion of 300 peak-hour vehicle trips. Under cumulative conditions, it is anticipated that the cumulative projects could result in substantial increases in vehicle traffic to surrounding roadways on which public transit would operate. The 3333 California Street project would generate 456 afternoon-peak-hour vehicle trips, which would be above the planning department's transit delay screening criterion of 300 afternoon peak hour vehicle trips under cumulative conditions. However, the 3333 California street project-related increases in traffic volumes would only result in a two-second increase in intersection average delay and an increase of less than five seconds on approaches, thus transit delays would not be substantial. The 726 Presidio Avenue and 2601 Sutter Street cumulative projects are residential projects and would not substantially affect vehicular circulation or increase peak hour vehicle or transit trips in the project vicinity as to result in substantial transit delay. For these reasons, the proposed project would not combine with cumulative projects to result in a substantial transit delay. No significant cumulative transit impacts would occur, and the impacts would be less than significant.

VMT

VMT by its nature is largely a cumulative impact. The number and distance of vehicular trips associated with cumulative projects might contribute to the secondary physical environmental impacts associated with VMT. It is likely that no single project by itself would be sufficient in size to prevent the region or state in meeting its VMT reduction goals. Instead, a project's individual VMT contributes to cumulative VMT impacts. As described under Impact TR-5, the project would meet the project-level screening criteria and therefore would not result in significant VMT impacts. As presented in Table 9, the future (2040) average daily VMT per employee for office uses in TAZ 843 is approximately 38.1 percent lower than the regional Bay Area average. The proposed project has a VMT of more than 15 percent below future (2040) regional averages and would not contribute to any substantial cumulative increase in VMT. For the reasons stated above, the proposed project would result in less-than-significant cumulative VMT impacts.

Table 9 Cumulative 2040 Average Daily Vehicle Miles Traveled in TAZ 843

Land Use	Bay Area Regional Average	Bay Area Regional Average minus 15 percent (Significance Threshold)	TAZ 843
Office	17.1	14.5	8.97

SOURCES: Eligibility Checklist; CEQA Section 21099 Modernization of Transportation Analysis, 2021.

LOADING

Under cumulative conditions, loading activities for the cumulative development projects would occur in the vicinity of their respective project sites and would not combine with the proposed project's loading demand. As discussed under Impact TR-6, the proposed project would include an on-street passenger loading area to accommodate student pick-up and drop-off. The passenger loading demand would be split between the project site and the existing loading area on the north side of Washington Street. The passenger loading area at the project site would be able to accommodate passenger loading demand during peak morning and afternoon periods. While the north side of Washington Street loading area would continue to not be sufficient to accommodate the loading demand under existing-plus-project conditions, the vehicle queues would not extend into the intersection of Washington Street and Baker Street, and no transit lines are located within the vicinity. The closest cumulative project, 3333 California Street, would include three on-street and one on-site passenger loading areas and an off-street area for childcare passenger loading, which would be able to accommodate that cumulative project's passenger loading demand. As noted in the 3333 California EIR, all loading would be accommodated on-site and loading demand would not conflict with other nearby land uses, such as the Jewish Community Center at 3200 California Street.³³ Because people arriving at or leaving a building or other destination typically do so as close to the entrance as possible, loading impacts are localized and do not extend beyond the site frontage when sufficient loading spaces are provided to meet the anticipated demand. Because passenger and freight loading activity for the cumulative land use projects would be accommodated off-street or at the curb adjacent to the cumulative projects and are therefore not expected to compete with loading demand for the proposed project, the proposed project would not combine with cumulative projects to result in cumulative loading impacts.

33 3333 California Mixed-Use Project Final EIR, Case No. 2015-014028ENV.

Therefore, passenger-loading activity generated by the proposed project and nearby cumulative projects would not combine to create potentially hazardous conditions for people walking, bicycling, or driving or substantially delay public transit due to unmet passenger-loading demand. Thus, the cumulative passenger-loading impacts of the proposed project, in combination with the cumulative projects, would be less than significant.

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact	Not Applicable
6. NOISE. Would the project result in:					
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐	☐
b) Generation of excessive groundborne vibration or groundborne noise levels?	☐	☒	☐	☐	☐
c) For a project located within the vicinity of a private airstrip or an airport land use plan area or, where such a plan has not been adopted, in an area within two miles of a public airport or public use airport, would the project expose people residing or working in the area to excessive noise levels?	☐	☐	☐	☐	☒

The project is not within an area covered by an airport land use plan or within 2 miles of a public airport or a public use airport. Therefore, E.6(c) would not be applicable to the proposed project.

Impact NO-1: The proposed project would generate a substantial temporary or permanent increase in ambient noise levels in the project vicinity, in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. (*Less than Significant*)

CONSTRUCTION

The construction period for the proposed project would last approximately 20 months and would not involve construction activities at night. Construction equipment and activities would generate noise that could be considered an annoyance by occupants of nearby properties. Construction noise levels would fluctuate depending on construction phase, equipment type and duration of use, distance between noise source and affected receptor, and the presence (or absence) of barriers. Impacts would generally be limited to periods during which excavation occurs, new foundations are installed, and exterior structural and facade elements are altered. Interior construction noise would be substantially reduced by exterior walls.

Construction of the proposed project would require excavation of the project site to a depth of 10 to 26 feet below ground surface. The proposed building would rest on a mat foundation; pile driving would not be

required. Therefore, there would be no noise impacts associated with pile driving during construction of the proposed project.

The City of San Francisco regulates noise by the San Francisco Noise Ordinance (article 29 of the San Francisco Police Code, sections 2907 and 2908. Section 2907 of the police code requires that noise levels from individual pieces of construction equipment not exceed 80 A-weighted decibels (dBA)³⁴ when measured at a distance of 100 feet from the source, which is equivalent to 86 dBA at 50 feet.³⁵ Exemptions from this requirement include impact tools with approved mufflers, pavement breakers and jackhammers with approved acoustic shields, and construction equipment used in connection with emergency work. Table 10 provides typical noise levels produced by various types of construction equipment that would be employed for construction of the proposed project. The proposed project would be required to comply with the regulations set forth in the noise ordinance.

Section 2908 of the police code prohibits construction between 8:00 p.m. and 7:00 a.m. if noise would exceed the ambient noise level by 5 dBA at the nearest property line unless the City has issued a special permit. The construction period for the proposed project would last approximately 20 months and would not involve construction activities at night. Project construction typically would occur between 7:00 a.m. and 3:30 p.m., Monday through Friday. Shoring and other construction activities may occur between 7:00 a.m. and 5:30 p.m. Work may occur on Saturdays, as needed. Therefore, the proposed project would comply with section 2908 of the police code.

The nearest sensitive receptors to the project site are the Laurel Inn, immediately adjacent the west, an immediately adjacent residential building to the east, and the residences to the north with the closest buildings located 55 feet away. Residences also are located 85 feet to the south of the project site across California Street.

The adjacent and nearby residences would likely experience temporary and intermittent increases in noise levels associated with construction activities as well as the passage of construction trucks to and from the project site. As stated above, the proposed project would be required to comply with the regulations set forth in the noise ordinance, which requires that noise levels from individual pieces of construction equipment not exceed 80 dBA at a distance of 100 feet from the source. As shown in Table 10, construction equipment used for the proposed project would operate within the constraints of the noise ordinance (section 2907 of the police code). Project-related construction activities would not expose individuals to temporary increases in noise levels that are substantially greater than ambient noise levels. Construction-related noise impacts would be less than significant, and no mitigation measures are necessary.

34 The decibel (dB) scale is used to quantify sound intensity. When addressing the effects of noise on people, it is necessary to consider the frequency response of the human ear, or those frequencies that people hear the best. The frequency weighting most often used to evaluate environmental noise is “A weighting” because it best reflects how humans perceive noise. Measurements from instruments using this system, and associated noise levels, are reported in dBA.

35 San Francisco Planning Department, *Noise Impact Analysis Guidelines – DRAFT*, Table 5.1, March 2020.

Table 10 Typical Noise Levels from Proposed Project Construction Equipment^{36,}

Construction Equipment	Noise Level (dBA, L _{eq} at 50 feet)	Noise Level (dBA, L _{eq} at 100 feet)
Excavators	81	75
Backhoe	78	72
Bulldozer	82	76
Crane	81	75
Front End Loader	79	73
Vibratory Roller/Compactor	83	77
Shoring Drill Rig	79	73
Air Compressor	78	72
Dump/Concrete Trucks	79	73
Concrete Pump	81	75
Manlift	75	69
Generator	81	75

NOTES:

dBA = A-weighted decibels; L_{eq} = equivalent continuous sound level

The above L_{eq} noise levels are calculated assuming a 100 percent usage factor at full load (i.e., L_{max} noise level 100 percent) for the 1-hour measurement period.

Forklifts are not considered heavy construction equipment, and therefore are not presented in the table.

OPERATION

Project implementation would add a fifth building to the SFUHS campus. Vehicular traffic makes the largest contribution to ambient noise levels throughout most of San Francisco. Generally, traffic would need to double in volume to produce a noticeable 3-dBA increase in ambient noise levels in the project vicinity.³⁷ The SFMTA collected traffic counts for two intersections near the project site: California/Laurel (2.5 blocks west) and California/Baker (1.5 blocks east). Traffic counts recorded more than 6,000 daily vehicles at California/Laurel and more than 7,400 daily vehicles at California/Baker.³⁸ The proposed project would generate 270 daily vehicle trips.³⁹ Project-generated vehicle trips would not cause traffic volumes to double on nearby streets; as a result, project-generated traffic noise would not have a noticeable effect on ambient

36 Federal Highway Administration, Roadway Construction Noise Model User's Guide, 2006, p. 3. Available online at http://www.fhwa.dot.gov/environment/noise/construction_noise/rcnm/rcnm.pdf, accessed January 4, 2021.

37 Federal Highway Administration, 2011 (December), Highway Traffic Noise: Analysis and Abatement Guidance, available at: http://www.fhwa.dot.gov/environment/noise/regulations_and_guidance/analysis_and_abatement_guidance/revguidance.pdf, accessed January 31, 2022.

38 Federal Highway Administration, Roadway Construction Noise Model User's Guide, 2006, p. 3. Available online at http://www.fhwa.dot.gov/environment/noise/construction_noise/rcnm/rcnm.pdf, accessed January 4, 2021.

39 Federal Highway Administration, 2011 (December), Highway Traffic Noise: Analysis and Abatement Guidance, available at: http://www.fhwa.dot.gov/environment/noise/regulations_and_guidance/analysis_and_abatement_guidance/revguidance.pdf, accessed January 31, 2022.

noise levels in the project vicinity. The impact would be less than significant. No mitigation would be required.

Mechanical building equipment (e.g., heating, ventilation, and air conditioning [HVAC] systems) as well as other noise-generating devices (e.g., amplified sound systems) associated with institutional uses would generate operational noise. However, the noise sources would be subject to the noise limits specified in the noise ordinance, specifically police code section 2909(b) and 2909(d).^{40,41} The HVAC system and other mechanical equipment included as part of the proposed project would be housed in a mechanical well on the building roof and shielded by a solid noise barrier. The noise barrier would range from three feet above the roof at the southern end of the well to nine feet above the roof at the northern end and would incorporate sound-absorptive media on the surface facing the equipment. In addition, the vertical portions of the shafts from the air handling units to the roof would be lined with a minimum one-inch-thick internal acoustical lining.

A operational noise memorandum was prepared to analyze the proposed project’s potential operational noise impacts on adjacent properties.⁴² The memorandum includes a noise analysis of the outdoor mechanical equipment at the nearest property planes and calculated sound levels from all equipment, assuming each piece of equipment would run simultaneously during any hour day or night. **Table 11** summarizes the mechanical noise levels at the various property planes with respect to Police Code Section 2909(b). All project mechanical equipment noise levels would comply with the noise ordinance criterion.

Table 11 Mechanical Equipment Noise Levels at Nearest Property Planes

Location	Noise Level (dBA)	Police Code Section 2909(b) Criterion (dBA)
North Property Plane	48	53
East Property Plane	51	
South Property Plane, facing California Street	49	
West Property Plane.	48	

Mechanical equipment noise levels were also calculated at the nearest indoor receptor with respect to Police Code Section 2909(d). **Table 12** summarizes the calculated interior noise levels, assuming open windows. Noise levels from mechanical equipment at the nearest indoor receptor would comply with the noise ordinance criterion of 45 dBA.

40 San Francisco Police Code section 2909(b) limits noise to 8 dBA above ambient at the property plane of a commercial property.

41 San Francisco Police Code section 2909 (d) limits interior noise to 45 dBA between the hours of 10 p.m. and 7 a.m. or 55 dBA between the hours of 7 a.m. and 10 p.m. at the nearest sensitive receptor.

42 Salter, 2022 (July 21), UHS 3150 California Street Environmental Noise Assessment (Case no. 2021-001922ENV) Salter Project 21-0453.

Table 12 **Calculated Mechanical Equipment Noise Levels at Nearest Noise Sensitive Receivers to Police Code Section 2909(d)**

Location	Distance (feet)	Calculated Noise Level (dBA)	Police Code Section 2909(b) Criterion (dBA)
3110 California Street	0.5	36	45
444 Presidio Avenue – The Laurel Inn	0.5	33	
1809 Lyon Street	11	35	

The proposed project would have internal amplified sound systems within the building envelope with the potential to exceed operational noise limits in police code section 2909(b), without proper noise attenuation. Speakers associated with the amplified sound systems would be installed within the building, and offsite sensitive noise receptors would be shielded by the exterior façade. Additional noise control measures that would be incorporated into the new building design (e.g., high efficiency windows and skylights) would attenuate internal amplified sound systems and minimize disturbances to adjacent properties. The noise memorandum analyzed the proposed project’s potential operational noise impacts and includes an estimate of the proposed project’s amplified speech and music transmission to adjacent property lines to determine if the proposed project would exceed operational noise limits of the Police Code.⁴³ The memorandum concludes that the amplified sound system, through the use of a governor/limiter, would not exceed 53 dBA at the adjacent property lines and would comply with the operational noise limits in police code section 2909(b).

The proposed project would include an outdoor roof terrace-gathering area on the northern portion of the building’s third level. Noise from students and staff utilizing the outdoor roof terrace during school hours would generate noise. Spoken word from students and staff utilizing the outdoor roof terrace during school hours is not regulated by the City noise ordinance and does not require review under CEQA. The roof terrace is set back from the edge of the building, which would increase distance between the terrace and adjacent offsite sensitive noise receptors. Additionally, a concrete parapet with a glass wall would be installed along the edge of the outdoor terrace, which would further attenuate noise to adjacent properties.

For the reasons discussed above, the proposed project would not generate a substantial permanent increase in ambient noise levels in the project vicinity in excess of standards established in the local general plan or noise ordinance or applicable standards of other agencies. The impact would be less than significant.

Impact NO-2: The proposed project would generate excessive groundborne vibration or groundborne noise levels. (*Less than Significant with Mitigation Incorporated*)

The following discussion is based on a vibration study prepared for the proposed project.⁴⁴ Vibration usually consists of the excitation of a structure or surface and consists of an amplitude and frequency. Vibration can

43 Salter, 2022 (August 16), UHS 3150 California Street Environmental Noise Assessment (Case no. 2021-001922ENV) Salter Project 21-0453.

44 Baseline Environmental Consulting, 2022 (March 9), Vibration Technical Memorandum, 3150 California Street, San Francisco, California.

be measured in terms of acceleration, velocity, or displacement. Groundborne vibration from construction activities can produce detectable vibration at nearby buildings, infrastructure, and sensitive receptors. The main concerns associated with construction-generated vibration include sleep disturbance, building damage, and interference with vibration-sensitive instruments or machinery, such as that used in research laboratories or hospitals.

The primary vibration-sensitive receptors in the project area would be existing structures, which could be susceptible to damage, and people, who could be susceptible to vibration-related annoyance, particularly during nighttime hours. As nighttime work is not anticipated to occur, vibration annoyance impacts on people within residential buildings related to nighttime construction would not occur. Because no hospitals are near the project site that may contain vibration sensitive equipment, such as magnetic resonance imaging equipment or high-resolution lithographic, optical, or electron microscopes, the proposed project would not cause vibration that would affect vibration-sensitive equipment and such potential impacts are not considered in the following analysis.

A common practice is to monitor vibration measures in terms of peak particle velocities (PPVs) in inches per second (in/sec). Caltrans has developed vibration thresholds based on PPV⁴⁵ values to evaluate the potential impact of construction vibration on structures. Construction vibrations that are equal to or exceed the vibration thresholds could result in potential damage to structures. Construction vibrations would include transient sources (i.e., a single, isolated vibration event), such as construction blasting, and continuous or frequent intermittent sources, such as impact pile drivers, vibratory pile drivers, and vibratory compaction equipment. The Caltrans vibration thresholds to prevent damage to buildings are shown in Table 13.

Table 13 **Vibration Thresholds for Structural Impacts—Damage**

Structure and Conditions	Maximum PPV (in/sec)	
	Transient Sources	Continuous or Frequent Intermittent Sources
Extremely fragile historic buildings, ruins, ancient monuments	0.12	0.08
Fragile buildings	0.2	0.1
Historic and some old buildings	0.5	0.25
Older residential structures	0.5	0.3
New residential structures	1.0	0.5
Modern industrial/commercial buildings	2.0	0.5

Source: California Department of Transportation, 2020 (April), *Transportation and Construction Vibration Guidance Manual*, Table 19.

CONSTRUCTION

Groundborne vibration levels generated during project construction were estimated using data published by the Federal Transit Administration.⁴⁶ Typical vibration levels resulting from heavy-duty construction

45 The maximum rate or velocity of particle movement is the commonly accepted descriptor of the vibration “strength.” This is referred to as the peak particle velocity and typically is measured in inches per second.

46 Federal Transit Administration, 2018 (September), *Transit Noise and Vibration Impact Assessment Manual*, FTA Report No.0123, available at: https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-ftareport-no-0123_0.pdf, accessed December 9, 2021.

equipment at the Federal Transit Administration reference distance of 25 feet is shown in Table 14. The most vibration-intensive types of construction equipment that are expected to be used for the proposed project are the vibratory roller and caisson drill. The buffer distances at which vibration levels would be reduced below the calculated damage thresholds for structures are shown in Table 14.

Table 14 Building Damage Buffer Distances

Vibration-Generating Equipment	PPV at 25 feet	Source Character	Required Buffer Distance from Sources ^a		
			Historic and Some Old Buildings Damage Thresholds (0.25 in/sec PPV for Continuous/Frequent Intermittent sources; 0.5 in/sec PPV for transient sources)	New Residential Structures Damage Thresholds (0.5 in/sec PPV for Continuous/Frequent Intermittent sources; 1.0 in/sec PPV for Transient sources) ^a	Modern Industrial/Commercial Buildings Damage Thresholds (0.5 in/sec PPV for Continuous/Frequent Intermittent sources; 2.0 in/sec PPV for Transient sources) ^b
Vibratory Roller	0.21	Continuous/Frequent Intermittent Sources	22	14	14
Caisson Drilling	0.089	Continuous/Frequent Intermittent Sources	13	8	8
Large Bulldozer	0.089	Transient Sources	8	5	3
Loaded Trucks	0.076	Transient Sources	7	4	3
Small Bulldozer	0.003	Transient Sources	1	1	<0

Notes:

All measurements are shown in feet.

^a The minimum distance required to avoid vibratory impacts

^b Thresholds for “new residential structures” were used for nearby residential buildings.

^c Thresholds for “modern industrial/commercial buildings” were used for the hotel.

There are no historic buildings within 22 feet of the project site that could be affected by vibration from construction equipment. However, the residential buildings at 1809 Lyon Street, 1811 Lyon Street, 3110 California Street, and 424 Presidio Avenue and the hotel at 444 Presidio Avenue would be within the 14-foot buffer at which vibration damage could occur. Therefore, construction vibration potentially could exceed the Caltrans damage thresholds at the residential buildings adjacent to the project site.

Implementation of Mitigation Measure M-NO-2: Protection of Adjacent Buildings/Structures and Vibration Monitoring during Construction would require the project applicant to conduct surveys before and after project construction to determine whether project construction caused any damage to these buildings. The impact would be less than significant with mitigation incorporated.

Mitigation Measure M-NO-2: Protection of Adjacent Buildings/Structures and Vibration Monitoring during Construction

Prior to issuance of any demolition or building permit, the property owner shall submit a project-specific Pre-construction Survey and Vibration Management and Monitoring Plan to the planning department for approval. The plan shall identify all feasible means to avoid damage to potentially affected buildings (1809 Lyon Street, 1811 Lyon Street, 3110 California Street, 424 Presidio Avenue, and 444 Presidio Avenue). The property owner shall ensure that the following requirements of the Vibration Management and Monitoring Plan are included in contract specifications.

Pre-construction Survey. Prior to the start of any ground-disturbing activity, the project sponsor shall engage a consultant to undertake a pre-construction survey of potentially affected buildings. If potentially affected buildings and/or structures are not potentially historic, a structural engineer or other professional with similar qualifications shall document and photograph the existing conditions of the potentially affected buildings and/or structures. The project sponsor shall submit the survey to the lead agency for review and approval prior to the start of vibration-generating construction activity. If nearby affected buildings are potentially historic, the project sponsor shall engage a historic architect or qualified historic preservation professional and a structural engineer or other professional with similar qualifications to undertake a pre-construction survey of potentially affected historic buildings. The pre-construction survey shall include descriptions and photographs of both the exterior and interior of all identified historic buildings including all facades, roofs, and details of the character-defining features that could be damaged during construction, and shall document existing damage, such as cracks and loose or damaged features. The report shall also include pre-construction drawings that record the pre-construction condition of the buildings and identify cracks and other features to be monitored during construction. The historic architect or qualified historic preservation professional should be the lead author of the pre-construction survey if historic buildings and/or structures could be affected by the project. These reports shall be submitted to the lead agency for review and approval prior to the start of vibration-generating construction activity.

Vibration Management and Monitoring Plan. The project sponsor shall undertake a monitoring plan to avoid or reduce project-related construction vibration damage to adjacent buildings and/or structures and to ensure that any such damage is documented and repaired. The vibration management and monitoring plan shall apply to all potentially affected buildings and/or structures. Prior to issuance of any demolition or building permit, the project sponsor shall submit the vibration management and monitoring plan that lays out the monitoring program to the lead agency for approval. If historic buildings could be affected, the vibration management and monitoring plan shall also be submitted to the lead agency's preservation staff for review and approval, if applicable.

The *vibration management and monitoring plan* shall include, at a minimum, the following components, as applicable:

- **Maximum Vibration Level.** Based on the anticipated construction and condition of the affected buildings and/or structures on adjacent properties, a qualified acoustical/vibration consultant in coordination with a structural engineer (or professional with similar qualifications) and, in the case of potentially affected historic buildings/structures, a historic architect or qualified historic preservation professional, shall establish a maximum vibration level that shall not be exceeded at each building/structure on adjacent properties, based on existing conditions, character-defining features, soil conditions, and anticipated construction practices (common standards are a peak particle velocity [PPV] of 0.25 inch per second for historic and some old buildings, a PPV of 0.3 inch per second for older residential structures, and a PPV of 0.5 inch per second for new residential structures and modern industrial/commercial buildings).
- **Vibration-generating Equipment.** The plan shall identify all vibration-generating equipment to be used during construction (including, but not limited to, site preparation, clearing, demolition, excavation, shoring, foundation installation, and building construction).

- **Alternative Construction Equipment and Techniques.** The plan shall identify potential alternative equipment and techniques that could be implemented if construction vibration levels are observed in excess of the established standard (e.g., smaller, lighter equipment could be used in some cases).
- **Buffer Distances.** The plan shall identify buffer distances to be maintained based on vibration levels and site constraints between the operation of vibration-generating construction equipment and the potentially affected building and/or structure to avoid damage to the extent possible
- **Vibration Monitoring.** The plan shall lay out the method and equipment for vibration monitoring. To ensure that construction vibration levels do not exceed the established standard, the acoustical consultant shall monitor vibration levels at each affected building and/or structure on adjacent properties and prohibit vibratory construction activities that generate vibration levels in excess of the standard.
 - Should construction vibration levels be observed in excess of those established in the plan, the contractor(s) shall halt construction and put alternative construction techniques identified in the plan into practice, to the extent feasible.
 - The historic architect or qualified historic preservation professional (for effects on historic buildings and/or structures) and/or structural engineer (for effects on historic and non-historic buildings and/or structures) shall inspect each affected building and/or structure in the event the development project exceeds the established standards.
 - If vibration has damaged nearby buildings and/or structures that are not historic, the structural engineer shall immediately notify the lead agency and prepare a damage report documenting the features of the building and/or structure that has been damaged.
 - If vibration has damaged nearby buildings and/or structures that are historic, the historic preservation consultant shall immediately notify the lead agency and prepare a damage report documenting the features of the building and/or structure that has been damaged.
 - If no damage has occurred to nearby buildings and/or structures, then the historic preservation professional (if potentially affected buildings are historic) and/or structural engineer (for effects on historic and non-historic buildings) shall submit a monthly report to the lead agency for review. This report shall identify and summarize the vibration level exceedances and describe the actions taken to reduce vibration.
 - Following incorporation of the alternative construction techniques and/or lead agency review of the damage report, vibration monitoring shall recommence to ensure that vibration levels at each affected building and/or structure on adjacent properties are not exceeded.
- **Periodic Inspections.** The plan shall lay out the intervals and parties responsible for periodic inspections. The historic architect or qualified historic preservation professional (for effects on historic buildings and/or structures) and/or structural engineer (for effects on historic and non-

historic buildings and/or structures) shall conduct regular periodic inspections of each affected building and/or structure on adjacent properties during vibration-generating construction activity on the project site. The plan will specify how often inspections and reporting shall occur.

- **Repairing Damage.** The plan shall also identify provisions to be followed should damage to any building and/or structure occur due to construction-related vibration. The building(s) and/or structure(s) shall be remediated to their pre-construction condition at the conclusion of vibration-generating activity on the site. For historic resources, should damage occur to any building and/or structure, the building and/or structure shall be restored to its pre-construction condition in consultation with the historic architect or qualified historic preservation professional and lead agency
- **Vibration Monitoring Results Report.** After construction is complete, the lead agency shall receive a final report from the historic architect or qualified historic preservation professional (for effects on historic buildings and/or structures) and/or structural engineer (for effects on historic and non-historic buildings and/or structures). The report shall include, at minimum, collected monitoring records, building and/or structure condition summaries, descriptions of all instances of vibration level exceedance, identification of damage incurred due to vibration, and corrective actions taken to restore damaged buildings and structures. The lead agency shall review and approve all vibration monitoring results reports.

OPERATION

The proposed project would be an educational building that would not include operational sources of vibration. Thus, the proposed project would not introduce new sources of groundborne vibration into the environment. No impact would occur.

Impact C-NO-1. The proposed project, in combination with cumulative projects, would not result in a significant cumulative noise impact. (*Less than Significant*)

CONSTRUCTION NOISE

The geographic extent for the cumulative impact analysis for noise would be limited to cumulative projects within 900 of the project site, because noise levels and vibration attenuate rapidly with distance.

The 726 Presidio Avenue and 2601 Sutter Street projects are approximately 900 feet and 1,300 feet from the project site, respectively. Both of these projects are far enough from the project site that they would not combine with the proposed project to result in a significant cumulative construction noise impact. The closest cumulative project (3333 California Street) is approximately 200 feet southwest of the project site. Construction activities associated with the 3333 California Street project could overlap with construction activities associated with the proposed project and result in a significant cumulative construction noise impact. The 3333 California Street project has an anticipated construction period of 7 to 15 years and is required to implement a mitigation measure to address its construction noise impact. In contrast, the proposed project has a much shorter construction period of 20 months. As discussed under Impact NO-1, construction activities associated with the proposed project would be required to comply with the standards set forth in the noise ordinance, and no mitigation measures are required. Although the 3333 California Street project could combine with the proposed project to result in a significant cumulative construction

noise impact, the proposed project would not make a cumulatively considerable contribution to that cumulative impact.

OPERATIONAL NOISE

As discussed under Impact NO-1, the proposed project would increase operational vehicle trips for student pick-ups and drop-offs. Noise levels from these trips would generate a maximum noise level of 49.2 dBA L_{eq} at 50 feet from the road centerline. The ambient noise levels are more than 10 dBA higher than the potential traffic noise that would be generated by the proposed project. Therefore, the cumulative traffic noise impact would be less than significant. No mitigation is required.

Stationary noise sources, such as from HVAC equipment and exhaust fans, would not substantially increase ambient noise levels at locations more than a few hundred feet from the project site. As described under Impact NO-1, noise from the public address system would not exceed the City's 53 dBA requirement for indoor noise. The 726 Presidio Avenue and 2601 Sutter Street projects would not be close enough to combine with the proposed project to result in cumulative operational noise impacts. The proposed project and the 3333 California Street project would both incorporate noise attenuation measures for stationary equipment. Operational noise from the cumulative projects' stationary sources is anticipated to be substantially attenuated, to comply with section 2909 of the noise ordinance.

Therefore, the cumulative impact would be less than significant.

VIBRATION

As described under Impact NO-2, project construction could result in groundborne vibration impacts on the adjacent properties. Implementation of Mitigation Measure M-NO-2 would reduce this impact to a less-than-significant level. Environmental impacts related to groundborne vibration generally are site-specific, and groundborne vibration attenuates rapidly with distance from the source of vibration. The nearest cumulative project (3333 California Street) would be 200 feet from the project site. The cumulative projects would not be close enough to combine with the proposed project or each other to generate excessive groundborne vibration levels. For these reasons, the proposed project would not combine with cumulative projects to create a significant cumulative impact related to groundborne vibration levels. Impacts would be less than significant.

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact	Not Applicable
7. AIR QUALITY. Would the project:					
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐	☐
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal, state, or regional ambient air quality standard?	☐	☐	☒	☐	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☒	☐	☐	☐
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐	☐

OVERVIEW

The Bay Area Air Quality Management District (or air district) is the regional agency with jurisdiction over the nine-county San Francisco Bay Area Air Basin (air basin), which includes San Francisco, Alameda, Contra Costa, Marin, San Mateo, Santa Clara, and Napa Counties and portions of Sonoma and Solano Counties. The air district is responsible for attaining and maintaining air quality in the air basin within federal and state air quality standards, as established by the federal Clean Air Act and the California Clean Air Act, respectively. Specifically, the air district has the responsibility to monitor ambient air pollutant levels throughout the air basin and to develop and implement strategies to attain the applicable federal and state standards. The federal and state clean air acts require plans to be developed for areas that do not meet air quality standards, generally. The most recent air quality plan, the 2017 clean air plan, was adopted by the air district on April 19, 2017. The clean air plan updates the most recent Bay Area ozone plan, the 2010 clean air plan, in accordance with the requirements of the state Clean Air Act to implement all feasible measures to reduce ozone; provide a control strategy to reduce ozone, particulate matter, air toxics, and greenhouse gases in a single, integrated plan; and establish emission control measures to be adopted or implemented. The clean air plan contains the following primary goals:

Protect air quality and health at the regional and local scale: attain all state and national air quality standards, and eliminate disparities among Bay Area communities in cancer health risk from toxic air contaminants; and

Protect the climate: reduce Bay Area greenhouse gas emissions to 40 percent below 1990 levels by 2030 and 80 percent below 1990 levels by 2050.

The clean air plan represents the most current applicable air quality plan for the air basin. Consistency with this plan is the basis for determining whether the proposed project would conflict with or obstruct implementation of air quality plans (checklist question D.7.a).

CRITERIA AIR POLLUTANTS

In accordance with the state and federal Clean Air Acts, air pollutant standards are identified for the following six criteria air pollutants: ozone, carbon monoxide (CO), particulate matter (PM), nitrogen dioxide (NO₂), sulfur dioxide (SO₂), and lead. These air pollutants are termed criteria air pollutants because they are regulated by developing specific public health- and welfare-based criteria as the basis for setting permissible levels. The air basin is designated as either in attainment or unclassified for most criteria pollutants with the exception of ozone, PM_{2.5}, and PM₁₀,⁴⁷ for which these pollutants are designated as non-attainment for either the state or federal standards.⁴⁸ Ozone is a secondary air pollutant produced in the atmosphere through a complex series of photochemical reactions involving reactive organic gases (ROG) and oxides of nitrogen (NO_x).

By its very nature, regional air pollution is largely a cumulative impact in that no single project is sufficient in size to, by itself, result in non-attainment of air quality standards. Instead, a project's individual emissions contribute to existing cumulative air quality impacts. If a project's contribution to cumulative air quality impacts is considerable, then the project's impact on air quality would be considered significant.

Land use projects typically result in ozone precursor and particulate matter emissions because of increases in vehicle trips, space heating and natural gas combustion, landscape maintenance, and construction activities. For this reason, the air district has established significance thresholds for non-attainment criteria air pollutants, as shown in Table 15, Criteria Air Pollutant Significance Thresholds, below.

Table 15 Criteria Air Pollutant Significance Thresholds⁴⁹

Pollutant	Construction Thresholds	Operational Threshold	
	Average Daily Emissions (pounds/day)	Average Daily Emissions (pounds/day)	Maximum Annual Emissions (tons/year)
ROG	54	54	10
NO _x	54	54	10
PM ₁₀	82 (exhaust)	82	15
PM _{2.5}	54 (exhaust)	54	10
Fugitive Dust	Construction Dust Ordinance or other Best Management Practices	Not Applicable	Not Applicable

The significance thresholds for ROG and NO_x are based on the stationary source limits in air district regulation 2, rule 2, which requires that any new source that emits criteria air pollutants above the ROG and NO_x emissions limit in Table 15 must offset those emissions. The significance thresholds for particulate matter is based on the emissions limit in the federal New Source Review for stationary sources in

47 PM₁₀ is often termed "coarse" particulate matter and is made of particulates that are 10 microns in diameter or smaller. PM_{2.5}, termed "fine" particulate matter, is composed of particles that are 2.5 microns or less in diameter.

48 "Attainment" status refers to those regions that are meeting federal and/or state standards for a specified criteria pollutant. "Non-attainment" refers to regions that do not meet federal and/or state standards for a specified criteria pollutant. "Unclassified" refers to regions where there is not enough data to determine the region's attainment status for a specified criteria air pollutant.

49 Ibid., page 2-2.

nonattainment areas. The air district's California Environmental Quality Act Air Quality Guidelines⁵⁰ and supporting materials⁵¹ provide additional evidence to support these thresholds. Projects that would result in criteria air pollutant emissions below these significance thresholds would not result in a cumulatively considerable net increase in non-attainment criteria air pollutants within the air basin.⁵² Due to the temporary nature of construction activities, only the average daily thresholds are applicable to construction phase emissions.

Fugitive Dust

Additionally, fugitive dust emissions are typically generated during construction phases. Studies have shown that the application of best management practices at construction sites significantly control fugitive dust and individual measures have been shown to reduce fugitive dust by anywhere from 30 to 90 percent.⁵³ The air district has identified a number of best management practices to control fugitive dust emissions from construction activities.⁵⁴ The city's Construction Dust Control Ordinance (Ordinance No.176-08, effective July 30, 2008) requires a number of measures to control fugitive dust and the best management practices employed in compliance with the city's construction dust control ordinance are an effective strategy for controlling construction-related fugitive dust.

Local Health Risks and Hazards

In addition to criteria air pollutants, individual projects may emit *toxic air contaminants* (TACs). TACs collectively refer to a diverse group of air pollutants that can cause chronic (i.e., of long duration) and acute (i.e., severe but short-term) adverse effects to human health, including carcinogenic effects. Human health effects of TACs include birth defects, neurological damage, cancer, and mortality. There are hundreds of different types of TACs with varying degrees of toxicity; at a given level of exposure, one TAC may pose a hazard that is many times greater than another.

Unlike criteria air pollutants, TACs do not have ambient air quality standards but are regulated by the air district using a risk-based approach to determine which sources and pollutants to control as well as the degree of control. A health risk assessment is an analysis in which human health exposure to toxic substances is estimated and considered together with information regarding the toxic potency of the substances, to provide quantitative estimates of health risks.⁵⁵ Exposures to fine particulate matter (PM_{2.5}) are strongly associated with mortality, respiratory diseases, and decreased lung development in children,

50 Bay Area Air Quality Management District (air district), *California Environmental Quality Act Air Quality Guidelines*, May 2017. Available at: https://www.baaqmd.gov/~media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en. Accessed February 5, 2021.

51 Bay Area Air Quality Management District, *Revised Draft Options and Justification Report, California Environmental Quality Act Thresholds of Significance*, October 2009. Available at: <https://www.baaqmd.gov/~media/files/planning-and-research/ceqa/revised-draft-ceqa-thresholds-justification-report-oct-2009.pdf?la=en>. Accessed February 5, 2021.

52 Bay Area Air Quality Management District, *CEQA Air Quality Guidelines*, May 2017.

53 Western Regional Air Partnership. *2006. WRAP Fugitive Dust Handbook*. September 7, 2006. This document is available online at http://www.wrapair.org/forums/dejf/fdh/content/FDHandbook_Rev_06.pdf, accessed February 5, 2020.

54 Bay Area Air Quality Management District, *CEQA Air Quality Guidelines*, May 2017.

55 In general, a health risk assessment is required if the air district concludes that projected emissions of a specific air toxic compound from a proposed new or modified source suggest a potential public health risk. The applicant is then subject to a health risk assessment for the source in question. Such an assessment generally evaluates chronic, long-term effects, estimating the increased risk of cancer as a result of exposure to one or more TACs.

and other endpoints such as hospitalization for cardiopulmonary disease.⁵⁶ In addition to PM_{2.5}, diesel particulate matter (DPM) is also of concern. The California Air Resources Board (California air board) identified diesel particulate matter as a toxic air contaminant in 1998, primarily based on evidence demonstrating cancer effects in humans.⁵⁷ The estimated cancer risk from exposure to diesel exhaust is much higher than the risk associated with any other TAC routinely measured in the region.

Air pollution does not affect every individual in the population in the same way, and some groups are more sensitive to adverse health effects than others. Land uses such as residences, schools, children's day care centers, hospitals, and nursing and convalescent homes are considered to be the most sensitive to poor air quality because the population groups associated with these uses have increased susceptibility to respiratory distress or, as in the case of residential receptors, their exposure time is greater than that for other land uses. Therefore, these groups are referred to as sensitive receptors. Exposure assessment guidance typically assumes that residences would be exposed to air pollution 24 hours per day, 7 days a week, for 30 years.⁵⁸ Therefore, assessments of air pollutant exposure to residents typically result in the greatest adverse health outcomes of all population groups.

In an effort to identify areas of San Francisco most adversely affected by sources of TACs, San Francisco partnered with the air district to conduct a citywide health risk assessment based on an inventory and assessment of air pollution and exposures from mobile, stationary, and area sources within San Francisco. Areas with poor air quality, termed the *air pollutant exposure zone* were identified based on health-protective criteria that consider estimated cancer risk, exposures to fine particulate matter, proximity to freeways, and locations with particularly vulnerable populations, as further described below.

Excess Cancer Risk

The air pollutant exposure zone includes areas where modeled cancer risk exceeds 100 incidents per million persons exposed. This criterion is based on United States Environmental Protection Agency (EPA) guidance for conducting air toxic analyses and making risk management decisions at the facility and community-scale level.⁵⁹ The 100 per one million excess cancer cases is also consistent with the ambient cancer risk in the most pristine portions of the Bay Area based on air district regional modeling.⁶⁰

Fine Particulate Matter

In April 2011, the EPA published Policy Assessment for the Particulate Matter Review of the National Ambient Air Quality Standards, "Particulate Matter Policy Assessment." In this document, EPA staff strongly support a

56 San Francisco Department of Public Health, *Assessment and Mitigation of Air Pollutant Health Effects from Intra-Urban Roadways: Guidance for Land Use Planning and Environmental Review*, May 2008.

57 California Air Resources Board (ARB), Fact Sheet, "The Toxic Air Contaminant Identification Process: Toxic Air Contaminant Emissions from Diesel-fueled Engines," October 1998.

58 California Office of Environmental Health Hazard Assessment, *Air Toxics Hot Spot Program Risk Assessment Guidelines*, February, 2015. Pg. 4-44, 8-6.

59 Bay Area Air Quality Management District, *Revised Draft Options and Justification Report, California Environmental Quality Act Thresholds of Significance*, October 2009, page 67.

60 Bay Area Air Quality Management District, *CEQA Air Quality Guidelines*, May 2017, page D-43.

PM_{2.5} standard within the range of 12 to 11 µg/m³.⁶¹ The air pollutant exposure zone for San Francisco is based on the health-protective PM_{2.5} standard of 11 µg/m³, as supported by the EPA's Policy Assessment for the Particulate Matter Review of the National Ambient Air Quality Standards, although lowered to 10 µg/m³ to account for uncertainty in accurately predicting air pollutant concentrations using emissions modeling programs.

Proximity to Freeways

According to the California Air Resources Board (air board), studies have shown an association between the proximity of sensitive land uses to freeways and a variety of respiratory symptoms, asthma exacerbations, and decreases in lung function in children. Siting sensitive uses near freeways increases both exposure to air pollution and the potential for adverse health effects. As evidence shows that sensitive uses in an area within a 500-foot buffer of any freeway are at an increased health risk from air pollution,⁶² parcels that are within 500 feet of freeways are included in the air pollutant exposure zone.

Health Vulnerable Locations

Based on the air district's evaluation of health vulnerability in the Bay Area, those zip codes (94102, 94103, 94110, 94124, and 94130) in the worst quintile of Bay Area health vulnerability scores as a result of air pollution-related causes were afforded additional protection by lowering the standards for identifying parcels in the air pollutant exposure zone to: (1) an excess cancer risk greater than 90 per one million persons exposed, and/or (2) PM_{2.5} concentrations in excess of 9 µg/m³.⁶³

The above citywide health risk modeling is referenced in the Enhanced Ventilation Required for Urban Infill Sensitive Use Developments or Health Code, article 38 (Ordinance No. 224-14, effective December 8, 2014) (article 38). The purpose of article 38 is to protect the public health and welfare by establishing an air pollutant exposure zone and imposing an enhanced ventilation requirement for all urban infill sensitive use development within the zone. The project site is located within the air pollutant exposure zone and health code article 38 does apply to the proposed project. In addition, projects within the air pollutant exposure zone require special consideration to determine whether the project's activities would add a substantial amount of emissions to areas already adversely affected by poor air quality.

Impact AQ-1: The proposed project would not conflict with or obstruct implementation of the 2017 Clean Air Plan. (*Less than Significant*)

The most recently adopted air quality plan for the air basin is the air district's 2017 clean air plan. The clean air plan is a road map that demonstrates how the San Francisco Bay Area will achieve compliance with the state ozone standards and how the region will reduce the transport of ozone and ozone precursors to

61 United States Environmental Protection Agency, *Policy Assessment for the Review of the Particulate Matter National Ambient Air Quality Standards*. April 2011. Available at: <https://www3.epa.gov/ttn/naaqs/standards/pm/data/20110419pmpafinal.pdf>. Accessed February 5, 2021. The EPA published a new policy assessment in January 2020. The policy assessment did not include recommendations to change the standards for particulate matter. This document is available at: https://www.epa.gov/sites/production/files/2020-01/documents/final_policy_assessment_for_the_review_of_the_pm_naaqs_01-2020.pdf. Accessed February 5, 2021.

62 California Air Resources Board, *Air Quality and Land Use Handbook: A Community Health Perspective*. April 2005. Available online at: <http://www.arb.ca.gov/ch/landuse.htm>. Accessed February 5, 2021

63 San Francisco Planning Department and San Francisco Department of Public Health, *San Francisco Citywide Health Risk Assessment: Technical Support Documentation*. September 2020.

neighboring air basins. In determining consistency with the clean air plan, this analysis considers whether the project would: (1) support the primary goals of the plan; (2) include applicable control measures from the plan; and (3) avoid disrupting or hindering implementation of control measures identified in the plan.

The primary goals of the clean air plan are to: (1) protect air quality and health at the regional and local scale; (2) eliminate disparities among Bay Area communities in cancer health risk from toxic air contaminants; and (3) protect the climate by reducing greenhouse gas emissions. To meet the primary goals, the plan recommends 85 specific control measures and actions. These control measures are grouped into various categories and include stationary and area source measures, mobile source measures, transportation control measures, land use measures, and energy and climate measures. To the extent that the air district has regulatory authority over an emissions source generated by the project, the control measures may be requirements of the proposed project. Other measures in the plan not within the air district's regulatory authority may be advisory or are otherwise not specifically applicable to land use development projects.

The clean air plan recognizes that to a great extent, community design dictates individual travel mode, and that a key long-term control strategy to reduce emissions of criteria pollutants, air toxics, and greenhouse gases from motor vehicles is to channel future Bay Area growth into vibrant urban communities where goods and services are close at hand, and people have a range of viable transportation options.

The control measures most applicable to the proposed project are transportation control measures and energy and climate control measures. The proposed project's impact with respect to GHGs are discussed in Section D.8, Greenhouse Gas Emissions, which demonstrates that the proposed project would comply with the applicable provisions of the city's Greenhouse Gas Reduction Strategy.

The infill nature of the proposed project and high availability of viable transportation options ensure that students and staff could bicycle, walk, and ride transit to and from the project site instead of taking trips via private automobile. These features ensure that the project would avoid substantial growth in automobile trips and vehicle miles traveled. The proposed project's anticipated 270 new daily vehicle trips would result in a negligible increase in air pollutant emissions. Transportation control measures that are identified in the clean air plan are implemented by the San Francisco General Plan and the planning code, for example, through the city's Transit First Policy, transportation demand management program requirements, and transit impact development fees. Compliance with these requirements would ensure the project includes relevant transportation control measures specified in the clean air plan. Therefore, the proposed project would include applicable control measures identified in the clean air plan to meeting the plan's primary goals.

Examples of a project that could cause the disruption or delay of the clean air plan control measures are projects that would preclude the extension of a transit line or bike path, or projects that propose excessive parking beyond parking requirements. The proposed project would add a new academic building to a dense, walkable urban area near a concentration of regional and local transit service. It would not preclude the extension of a transit line or a bike path or any other transit improvement, and thus would not disrupt or hinder implementation of the clean air plan's control measures.

For the reasons described above, the proposed project would not conflict with or obstruct implementation of the clean air plan and this impact would be less than significant.

Impact AQ-2: The proposed project's construction activities would generate fugitive dust and criteria air pollutants, but would not result in a cumulatively considerable net increase of non-attainment criteria air pollutants within the air basin. (Less than Significant)

Construction activities (short term) typically result in emissions of ozone precursors and particulate matter in the form of dust (fugitive dust) and exhaust (e.g., vehicle tailpipe emissions). Emissions of ozone precursors and particulate matter are primarily related to the combustion of fuel from on-road and off-road vehicles. However, ROG emissions also are emitted from activities that involve painting, other types of architectural coatings, or asphalt paving. The proposed project's construction activities involve demolition of the existing building and parking lot and construction of a new SFUHS campus building. During the project's approximately 20-month-long construction period, construction activities would have the potential to result in emissions of ozone precursors and particulate matter, as discussed below.

FUGITIVE DUST

Project-related demolition, excavation, grading, and other construction activities may cause wind-blown dust that could contribute particulate matter into the local atmosphere. Depending on exposure, adverse health effects can occur due to this particulate matter in general and due to specific contaminants, such as lead or asbestos that may be constituents of soil. The current health burden of particulate matter demands that, where possible, public agencies take feasible available actions to reduce sources of particulate matter exposure.

In response, the San Francisco Board of Supervisors approved the Construction Dust Control Ordinance (Ordinance 176-08, effective July 30, 2008) with the intent of reducing the quantity of dust generated during site preparation, demolition and construction work in order to protect the health of the general public and of onsite workers, minimize public nuisance complaints, and to avoid orders to stop work by the department of building inspection.

The construction dust control ordinance requires that all site preparation work, demolition, or other construction activities within San Francisco that have the potential to create dust or to expose or disturb more than 10 cubic yards or 500 square feet of soil comply with specified dust control measures whether or not the activity requires a permit from the department of building inspection.⁶⁴

In compliance with the dust control ordinance, the project sponsor and contractor responsible for construction activities at the project site would be required to control construction dust on the site through a combination of watering disturbed areas, covering stockpiled materials, street and sidewalk sweeping, and other measures.

Compliance with the regulations and procedures set forth by the dust control ordinance would ensure that potential dust-related air quality impacts would be reduced to less than significant.

⁶⁴ The director of the department of building inspection may waive this requirement for activities on sites less than one half-acre that are unlikely to result in any visible wind-blown dust.

CRITERIA AIR POLLUTANTS

As discussed above, construction activities would result in emissions of criteria air pollutants from the use of off- and on-road vehicles and equipment and other construction activities. To assist lead agencies in determining whether short-term construction-related pollutant emissions require further analysis as to whether the project may exceed the criteria air pollutant significance thresholds shown in Table 15 above, the air district developed screening criteria.⁶⁵ If a proposed project meets the screening criteria, then construction of the project would result in less-than-significant criteria air pollutant impacts. A project that exceeds the screening criteria may require a detailed air quality assessment to determine whether criteria air pollutant emissions would exceed significance thresholds. The *CEQA Air Quality Guidelines* note that the screening levels are generally representative of new development on greenfield⁶⁶ sites without any form of mitigation measures taken into consideration. In addition, the screening criteria do not account project design features, attributes, or local development requirements that also could result in lower emissions.

The proposed project would include construction of a new SFUHS campus building and would increase student enrollment from 410 to 550 students. The size of the proposed construction activities would be below the criteria air pollutant screening sizes for the high school land use type (3,012 students for construction), identified in the air district's *CEQA Air Quality Guidelines*. Thus, quantification of construction-related criteria air pollutant emissions is not required, and the proposed project's construction activities would result in a less-than-significant criteria air pollutant impact.

Impact AQ-3: During project operations, the proposed project would result in emissions of criteria air pollutants, but not at levels that would result in a cumulatively considerable net increase in non-attainment criteria air pollutants. (*Less than Significant*)

As discussed above in Impact AQ-2, the air district has developed screening criteria to determine whether a project requires an analysis of project-generated criteria air pollutants. If all the screening criteria are met by a proposed project, then the lead agency or applicant does not need to perform a detailed air quality assessment.

The proposed project includes construction of a new SFUHS campus building and would increase student enrollment from 410 to 550 students. The proposed project would be below the criteria air pollutant screening sizes for the high school land use type (2,390 students for operation) identified in the air district's *CEQA Air Quality Guidelines*. Thus, quantification of project-generated criteria air pollutant emissions is not required, the proposed project would not exceed any criteria air pollutant significance thresholds and would result in less-than-significant impact with respect to criteria air pollutants.

Impact AQ-4: The proposed project's construction and operational activities would generate toxic air contaminants, including diesel particulate matter, that would not expose sensitive receptors to substantial pollutant concentrations. (*Less than Significant with Mitigation*)

As discussed above, the project site is located within an air pollutant exposure zone; therefore existing background health risks at the project site and vicinity are substantial. The proposed project would generate

65 Bay Area Air Quality Management District, *CEQA Air Quality Guidelines*, May 2017.

66 A greenfield site refers to agricultural or forest land or an undeveloped site earmarked for commercial, residential, or industrial projects.

toxic air contaminants during construction from the use of diesel-powered construction equipment and during operations from toxic air contaminant emissions resulting from increased vehicle trips. The construction and operational health risks from the proposed project's emissions are further analyzed below.

CONSTRUCTION EMISSIONS

According to the California air board, off-road equipment, which includes construction equipment, was the third largest source of mobile particulate matter emissions in California in 2012, the latest year for which inventory data is available.⁶⁷

However, a number of federal and state regulations are requiring cleaner off-road equipment. Specifically, both the EPA and the California air board have set emissions standards for new off-road equipment engines, ranging from *Tier 1* to *Tier 4*. Tier 1 emission standards were phased in between 1996 and 2000 and Tier 4 Interim and Final emission standards for all new engines were phased in between 2008 and 2015. Although the full benefits of these regulations will not be realized for several years, the EPA estimates that by implementing the federal Tier 4 standards, NO_x and PM emissions will be reduced by more than 90 percent.⁶⁸

In addition, construction activities do not lend themselves to analysis of long-term health risks because of their temporary and variable nature. As explained in the air district's *CEQA Air Quality Guidelines*:

“Due to the variable nature of construction activity, the generation of TAC emissions in most cases would be temporary, especially considering the short amount of time such equipment is typically within an influential distance that would result in the exposure of sensitive receptors to substantial concentrations. Concentrations of mobile-source diesel PM emissions are typically reduced by 70 percent at a distance of approximately 500 feet (ARB 2005). In addition, current models and methodologies for conducting health risk assessments are associated with longer-term exposure periods of 9, 40, and 70 years, which do not correlate well with the temporary and highly variable nature of construction activities. This results in difficulties with producing accurate estimates of health risk.”⁶⁹

Therefore, project-level analyses of construction activities have a tendency to produce overestimated assessments of long-term health risks. However, within the air pollutant exposure zone, additional construction activity may adversely affect populations that are already at a higher risk for adverse long-term health risks from existing sources of air pollution. Therefore, a health risk assessment was performed to evaluate potential health risks at the closest sensitive receptor location.

Sensitive land uses near the project site include residences approximately 55 feet north of the project site on Sacramento Street and the adjacent residential building to the east on California Street. Residences are 85 feet south of the project site, across California Street, and approximately 55 feet northwest of the project site

67 California Air Resources Board, 2017, 2012 Base Year Emissions, Off-Road Sources, Available: https://www.arb.ca.gov/app/emsmv/2017/emssumcat_query.php?F_YR=2012&F_DIV=4&F_SEASON=A&SP=SIP105ADJ&F_AREA=CA#8. Accessed February 3, 2021.

68 United States Environmental Protection Agency, “Clean Air Nonroad Diesel Rule: Fact Sheet,” May 2004.

69 Bay Area Air Quality Management District, *CEQA Air Quality Guidelines*, May 2017, page 8-7.

on Lyon Street. Sensitive receptors within 1,000 feet of the project site also include the University of California San Francisco's Laurel Heights Campus and SFUHS's South, Lower, and Middle campus buildings.

The proposed project would require construction activities for the approximate 20-month construction period. Project construction activities would result in short-term emissions of diesel particulate matter and other TACs. However, the project site is located in an area that already experiences poor air quality and project construction activities would generate additional air pollution, affecting nearby sensitive receptors.

A health risk assessment was performed to evaluate potential health risks at offsite sensitive receptors within 1,000 meters, including offsite residential and offsite student receptors.⁷⁰ The proposed project's health risk assessment was conducted using the U.S. EPA's American Meteorological Society/Environmental Protection Agency regulatory air dispersion model (AERMOD Version 21112).⁷¹ Modeling inputs were based on published guidance from the Bay Area Air Quality Management District, California Air Resources Control Board, California Office of Environmental Health Hazard Assessment, and the United States Environmental Protection Agency. Meteorological data for the year 2008 from Mission Bay, the nearest meteorological air monitoring site, was used.

The health risk assessment assessed potential cancer risk and PM_{2.5} concentrations associated with project construction. Risks were quantified at the closest offsite residential and offsite student receptor locations. The project sponsor has indicated their intention to use equipment with Tier 4 compliant emissions as a large portion of their construction equipment fleet, which can reduce construction emissions by 93 to 96 percent compared to equipment with engines meeting Tier 1 or Tier 2 emission standards.⁷² Additional details on assumptions and analysis methods for the health risk assessment are available in the *3150 California Street Project Health Risk Assessment*.⁷³

Locations already meeting the Air Pollutant Exposure Zone criteria are subject to a more stringent significance standard to ensure that a proposed project's contribution to existing health risks would not be significant. In these areas, a proposed project resulting in a contribution to PM_{2.5} concentrations above 0.2 µg/m³ or resulting in an excess cancer risk of 7.0 per one million persons exposed would be considered a significant impact. These are the significance thresholds by which a project would result in a considerable contribution to existing cumulative health risks. This analysis, therefore, also addresses the cumulative health risks to sensitive receptors.

As shown in [Table 16](#), with implementation of Mitigation Measure M-AQ 4, Clean Off-road Construction Equipment, with which the project sponsor would be required to comply, PM_{2.5} concentrations at the nearest receptor location would not exceed the 0.2 µg/m³ significance threshold. Likewise, with

70 Ramboll US Consulting, Inc, 2022, 3150 California Street Project Health Risk Assessment, August 2, 2022.

71 AERMOD version 21112 was the most recent version available at the time of starting this analysis. On April 22, 2022, EPA released an updated version of AERMOD (v22112) which includes various bug fixes and some enhancements, none of which are expected to materially impact the results for this analysis.

72 PM emissions benefits are estimated by comparing off-road PM emission standards for Tier 1 and Tier 2 with Tier 4 final emissions standards. Tier 1 PM emissions standards were established for equipment with 25- <50 horsepower and equipment with horsepower <175. Tier 1 emissions standards for these engines were compared against Tier 4 final emissions standards, resulting in a 96 percent reduction in PM. The EPA established PM standards for engines with horsepower between 50-<175 as part of the Tier 2 emission standards. For these engines Tier 2 emissions standards were compared against Tier 4 final emissions standards, resulting in between 93-95 percent reduction in PM.

73 Ramboll US Consulting, Inc, 2022, 3150 California Street Project Health Risk Assessment, August 2, 2022.

implementation of Mitigation Measure M-AQ-4, the excess cancer risk would be below the threshold of 7.0 in a million. Therefore, the proposed project's health risk impact at the nearest sensitive receptors would be less than significant with implementation of the mitigation measure.

Table 16 Construction PM_{2.5} Emissions and Cancer Risk at the Nearest Receptors

Risk Type	Offsite Student – Maximum Value	Offsite Resident – Maximum Value	Threshold	Threshold Exceeded?
Source				
Cancer risk (per one million persons exposed)	0.12	6.3	7.0	No
Total PM _{2.5} annual average concentration (ug/m ³)	0.0017	0.032	0.2	No

SOURCE: Ramboll US Consulting, Inc, 2022, 3150 California Street Project Health Risk Assessment.

Mitigation Measure M-AQ-4: Clean Off-road Construction Equipment

Prior to construction, the project sponsor shall submit a construction emissions minimization plan to the Environmental Review Officer (ERO) for review and approval by an Environmental Planning Air Quality Specialist. Upon approval of construction emissions minimization plan, the sponsor shall implement the plan. The plan shall detail project compliance with the following requirements:

A. Engine Requirements

1. All construction equipment shall contain engine tiers consistent with the U.S. Environmental Protection Agency engine tiers as provided in 3150 California Street Project Health Risk Assessment, Table 1, Construction Equipment (reproduced in the Mitigation Monitoring and Reporting Program). Documentation of equipment tiers for in-use equipment shall be maintained onsite as part of the plan.
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.

B. Waivers

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 onsite 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 off-road equipment meeting the construction equipment list 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 does not meet the equipment list requirements. If the ERO grants the waiver, the contractor must use the next cleanest piece of off-road equipment, or another alternative that results in comparable reductions in particulate matter.

C. Construction Emissions Minimization Plan

1. Before starting onsite 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.
2. The plan shall include estimates of the construction timeline by phase, with a description of each piece of off-road equipment required for every construction phase. The description may include, but is not limited to: equipment type, equipment manufacturer, equipment identification number, engine model year, engine certification (Tier rating), horsepower, engine serial number, and expected fuel use and hours of operation. For VDECS installed, the description may include: technology type, serial number, make, model, manufacturer, air board 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.
3. 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.
4. 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.

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 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.

Significance after Mitigation: While emission reductions from limiting idling, educating workers, and properly maintaining equipment are difficult to quantify, as noted above, other measures, such as the requirement for equipment with Tier 4 compliant emissions, can reduce construction emissions by 93 to 96 percent compared to equipment with engines meeting Tier 1 or Tier 2 emission standards. Therefore, compliance with Mitigation Measure M-AQ-4 would reduce construction period TAC emissions on nearby sensitive receptors to a less-than-significant level.

OPERATION EMISSIONS

The proposed project would generate new vehicle trips which emit TACs. The air district considers roads with less than 10,000 vehicles per day “minor low-impact sources,” stating that these sources “do not pose a significant health impact even in combination with other nearby sources. These determinations were made through extensive modeling, sources tests, and evaluation of their TAC emissions.”⁷⁴ The proposed project’s 270 daily vehicle trips would be well below this level and would be distributed among the local roadway network, therefore an assessment of project-generated TACs resulting from vehicle trips is not required, and the proposed project would not generate a substantial amount of TAC emissions that could affect nearby sensitive receptors. A health risk assessment for operational sources of TACs for the proposed project was not performed because the emissions and associated health risks from operational sources are expected to be negligible.

In summary, the proposed project’s toxic air contaminant emissions would be less than significant with implementation M-AQ-4: Clean Off-Road Construction Equipment.

SITING SENSITIVE LAND USES

The proposed project would include development of a new academic and sports building and is considered a sensitive land use for purposes of air quality evaluation. For sensitive use projects within the air pollutant exposure zone, such as the proposed project, article 38 requires that the project sponsor submit an Enhanced Ventilation Proposal for approval by the San Francisco Department of Public Health that achieves protection from PM_{2.5} equivalent to that associated with a minimum efficiency reporting value 13 (MERV 13) filtration. The department of building inspection will not issue a building permit without written notification from the director of public health that the applicant has an approved enhanced ventilation proposal.

In compliance with article 38, the project sponsor has submitted an initial application to the health department.⁷⁵ The regulations and procedures set forth by article 38 would reduce exposure of sensitive receptors that may occupy the project site to substantial pollutant concentrations.

74 Bay Area Air Quality Management District, Recommended Methods for Screening and Modeling Local Risks and Hazards, pg. 12. May 2011. Available online at: <https://www.baaqmd.gov/~media/Files/Planning%20and%20Research/CEQA/BAAQMD%20Modeling%20Approach.ashx>. Accessed February 2, 2021.

75 Application for Article 38 Compliance Assessment for 3150 California Street, February 5, 2021

Impact AQ-5: The proposed project would not create objectionable odors that would adversely affect a substantial number of people. (*Less than Significant*)

Typical odor sources of concern include wastewater treatment plants, sanitary landfills, transfer stations, composting facilities, petroleum refineries, asphalt batch plants, chemical manufacturing facilities, fiberglass manufacturing facilities, auto body shops, rendering plants, and coffee roasting facilities. During construction, diesel exhaust from construction equipment would generate some odors. However, construction-related odors would be temporary and would not persist after project completion. The proposed uses are not typical odor sources of concern and would not create a significant source of new odors. Therefore, the proposed project would not result in other emissions, such as odors, that could adversely affect a substantial number of people and this impact would be less than significant.

Impact C-AQ-1. The proposed project, in combination with cumulative projects, would contribute to cumulative impact on air quality. (*Less than Significant with Mitigation*)

As discussed above, the project site is in the air pollutant exposure zone and nearby sensitive receptors already experience poor air quality. This means significant air quality health risk impacts existing even without the proposed project. The proposed project and other cumulative projects in the vicinity such as 3333 California Street, would result in additional emissions of toxic air contaminants, including diesel particulate matter emissions from new vehicle trips and other stationary emissions sources similar to the proposed project's diesel generator emissions, as well as diesel emissions from construction activities.

As described in Impact AQ-4, above, the proposed project's 270 average daily vehicle trips would be considered minor low-impact sources that do not pose a significant health impact even in combination with other nearby sources.

The project would involve construction activities that require off-road equipment that emit diesel particulate matter and other toxic air contaminants. Health risk impacts for the construction of 3333 California Street were calculated as part of that project's environmental review. As a part of the health risk assessment for the proposed project, the maximum health risk impacts identified were added to impacts at the proposed project's maximally exposed individual sensitive receptors, which is very conservative. In reality, health risks from the 3333 California Street project are expected to be lower at the proposed project's nearest sensitive receptors based on the fact that the proposed project's nearest sensitive residential and offsite student receptors are located approximately 875 feet and 1,147 feet, respectively, from the 3333 California Street construction emissions sources.

Additionally, the health risk significance thresholds already take into account the cumulative contribution of localized health risks to sensitive receptors from sources included in the citywide modeling plus the proposed project's sources. The proposed project would not exceed the lowered, project-level threshold of $0.2 \mu\text{g}/\text{m}^3$ for $\text{PM}_{2.5}$ concentrations or 7.0 per million persons for cancer risk. Therefore, the proposed project's contribution to cumulative health risks would be less than cumulatively considerable. The impact would be less than significant.

The proposed project and cumulative projects would generate some odors during construction, but odors would be temporary. Upon completion of construction activities cumulative projects combined with the

proposed project would not generate substantial odors. Therefore, cumulative odor impacts would be considered less than significant.

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact	Not Applicable
8. GREENHOUSE GAS EMISSIONS. Would the project:					
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐	☐
b) Conflict with any applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐	☐

Greenhouse gas (GHG) emissions and global climate change represent cumulative impacts. GHG emissions cumulatively contribute to the significant adverse environmental impacts of global climate change. No single project could generate enough GHG emissions to noticeably change the global average temperature; instead, the combination of GHG emissions from past, present, and future projects have contributed and will continue to contribute to global climate change and its associated environmental impacts. For this reason, the analysis of the proposed project's impact on climate change focuses on the project's contribution to cumulatively significant GHG emissions and this section does not include an individual project-specific impact statement.

On April 20, 2022, the air district adopted updated GHG thresholds.⁷⁶ Consistent with CEQA Guidelines sections 15064.4 and 15183.5 which address the analysis and determination of significant impacts from a proposed project's GHG emissions, the updated thresholds for land use projects, such as the proposed project, maintains the air district's previous GHG threshold that allow projects that are consistent with a GHG reduction strategy to conclude that the project's GHG impact is less than significant. The updated thresholds also include an alternative performance-based threshold; if a project meets all of the following criteria, the project would result in a less than significant GHG impact:⁷⁷

- Project does not include natural gas and would not result in wasteful, inefficient, or unnecessary energy use;
- Project would result in VMT per capita that is 15 percent below the regional average and meet the CalGreen Tier 2 off-street electric vehicle requirement.

⁷⁶ Bay Area Air Quality Management District, CEQA Thresholds and Guidelines Update. Available: <https://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/updated-ceqa-guidelines>. Accessed: August 2, 2022.

⁷⁷ A project need only demonstrate compliance with one of the thresholds (consistency with a GHG reduction strategy or performance criteria) to find that the project's GHG emissions are less than significant.

San Francisco's 2017 GHG Reduction Strategy Update⁷⁸ presents a comprehensive assessment of policies, programs, and ordinances that collectively represent San Francisco's GHG reduction strategy in compliance with the air district's guidelines and CEQA Guidelines. These GHG reduction actions have resulted in a 41 percent reduction in GHG emissions in 2019 compared to 1990 levels,⁷⁹ which far exceeds the goal of 2020 GHG emissions equaling those in 1990 set in Executive Order S-3-05⁸⁰ and the California Global Warming Solutions Act.⁸¹ The city has also met and exceeded the 2030 target of 40 percent reduction below 1990 levels set in the California Global Warming Solutions Act of 2016⁸² and the air district's 2017 Clean Air Plan⁸³ more than 10 years before the target date.

San Francisco's GHG reduction goals, updated in July 2021 by ordinance 117-02,⁸⁴ are consistent with, or more aggressive than, the long-term goals established under executive orders S-3-05,⁸⁵ B-30-15,⁸⁶ B-55-18,⁸⁷ the California Global Warming Solutions Act of 2016.⁸⁸ The updated GHG ordinance demonstrates the city's commitment to continued GHG reductions by establishing targets for 2030, 2040, and 2050 and setting other critical sustainability goals. In particular, the updated ordinance sets a goal to reach net-zero sector-based GHG emissions by 2040 and sequester any residual emissions using nature-based solutions.⁸⁹ Thus, the city's GHG reduction goal is consistent with the state's long-term goal of reaching carbon neutrality by 2045. The

78 San Francisco Planning Department, *2017 Greenhouse Gas Reduction Strategy Update*, July 2017. Available: <https://sfplanning.org/project/greenhouse-gas-reduction-strategies>. Accessed: August 2, 2022.

79 San Francisco Department of the Environment, *San Francisco's 2019 Carbon Footprint*. Available: <https://sfenvironment.org/carbonfootprint>. Accessed: August 2, 2022.

80 Office of the Governor, Executive Order S-3-05, June 1, 2005. Available: <https://www.library.ca.gov/wp-content/uploads/GovernmentPublications/executive-order-proclamation/5129-5130.pdf>. Accessed: August 2, 2022.

81 California Legislative Information, Assembly Bill 32, September 27, 2006. Available: http://www.leginfo.ca.gov/pub/05-06/bill/asm/ab_0001-0050/ab_32_bill_20060927_chaptered.pdf. Accessed: August 2, 2022.

82 California Legislative Information, Senate Bill 32, September 8, 2016. Available: https://leginfo.ca.gov/faces/billPdf.xhtml?bill_id=20150160SB32&version=20150SB3288CHP. Accessed: August 2, 2022.

83 Bay Area Air Quality Management District. 2017. Clean Air Plan. September 2017. Available: <http://www.baaqmd.gov/plans-and-climate/air-quality-plans/current-plans>. Accessed: August 2, 2022.

84 San Francisco Board of Supervisors. *Ordinance No. 117-21, File No. 210563*. July 20, 2021. Available: <https://sfbos.org/sites/default/files/o0117-21.pdf>. Accessed: August 2, 2022. San Francisco's GHG reduction goals are codified in section 902(a) of the Environment Code and include the following goals: (1) by 2030, a reduction in sector-based GHG emissions of at least 61 percent below 1990 levels; (2) by 2030, a reduction in consumption-based GHG emissions equivalent to a 40 percent reduction compared to 1990 levels; (3) by 2040, achievement of net zero sector-based GHG emissions by reducing such emissions by at least 90 percent compared to 1990 levels and sequestering any residual emissions; and (4) by 2050, a reduction in consumption-based GHG emissions equivalent to an 80 percent reduction compared to 1990 levels.

85 Executive Order S-3-05 sets forth a goal of an 80 percent reduction in GHG emissions by 2050. San Francisco's goal of net zero sector-based emissions by 2040 requires a greater reduction of GHG emissions.

86 Office of the Governor, *Executive Order B-30-15*, April 29, 2015. Available: <https://www.ca.gov/archive/gov39/2015/04/29/news18938/>. Accessed: August 2, 2022. Executive Order B-30-15 sets a state GHG emissions reduction goal of 40 percent below 1990 levels by 2030. San Francisco's 2030 sector based GHG reduction goal of 61 percent below 1990 levels requires a greater reduction of GHG emissions.

87 Office of the Governor, *Executive Order B-55-18*, September 18, 2018. Available: <https://www.ca.gov/archive/gov39/wp-content/uploads/2018/09/9.10.18-Executive-Order.pdf>. Accessed: August 2, 2022. Executive Order B-55-18 establishes a statewide goal of achieving carbon neutrality as soon as possible, but no later than 2045, and achieving and maintaining net negative emissions thereafter. San Francisco's goal of net zero sector-based emissions by 2040 is a similar goal but requires achievement of the target five years earlier.

88 Senate Bill 32 amends California Health and Safety Code Division 25.5 (also known as the California Global Warming Solutions Act of 2006) by adding Section 38566, which directs that statewide greenhouse gas emissions be reduced by 40 percent below 1990 levels by 2030. San Francisco's 2030 sector-based GHG reduction goal of 61 percent below 1990 levels requires a greater reduction of GHG emissions.

89 Nature-based solutions are those that remove remaining emissions from the atmosphere by storing them in natural systems that support soil fertility or employing other carbon farming practices.

updated GHG ordinance requires the San Francisco Department of the Environment to prepare and submit to the mayor a climate action plan (CAP) by December 31, 2021. The CAP, which was released on December 8, 2021, and will be updated every five years, carries forward the efforts of the city's previous CAPs and charts a path toward meeting the GHG commitments of the Paris Agreement (e.g., limit global warming to 1.5 degrees Celsius) as well as the reduction targets adopted in the GHG ordinance.

In summary, the CEQA Guidelines and air district- adopted GHG thresholds allow projects consistent with an adopted GHG reduction strategy to determine a less than significant GHG impact. San Francisco has a GHG reduction strategy that is consistent with near and long-term state and regional GHG reduction goals and is effective because the city has demonstrated its ability to meet state and regional GHG goals in advance of target dates. Therefore, projects that are consistent with San Francisco's GHG reduction strategy would not result in GHG emissions that would have a significant effect on the environment, and would not conflict with state, regional, or local GHG reduction plans and regulations.

Impact C-GG-1: The proposed project would generate greenhouse gas emissions, but not at levels that would result in a significant impact on the environment or conflict with any policy, plan, or regulation adopted for the purpose of reducing greenhouse gas emissions. (*Less than Significant*)

The proposed project would increase the intensity of the use of the site by replacing a 20,000-square-foot commercial/office building and parking lot with a 48,000 square feet academic and athletic facility building.

Thus, the proposed project would contribute to the cumulative effects of climate change by directly or indirectly emitting GHGs during construction and operation. Direct operational effects from the proposed project include the GHG emissions from new vehicle trips. Indirect effects include the GHG emissions from electricity providers, including the generation of the energy required to pump, treat, and convey water; other GHG emissions are associated with waste removal, waste disposal, and landfill operations.

The proposed project would be subject to regulations adopted to reduce GHG emissions as identified in the GHG reduction strategy and demonstrated in the GHG checklist completed for the proposed project.⁹⁰ For example, the proposed project would comply with the city's Commuter Benefits Ordinance, Transportation Management Program, and requirements to provide bicycle parking, showers, and lockers in new and expanded buildings. The proposed project would comply with green-building requirements for energy efficiency, such as meeting LEED standards, complying with current water fixture and fitting efficiency requirements, and installing a solar photovoltaic system. The 3150 California Street building would be all-electric. The proposed project would also be required to meet the requirements of the San Francisco green building code.

In addition, the proposed project would comply with other applicable regulations that would reduce the project's GHG emissions related to energy use, waste disposal, and use of refrigerants. As discussed above, these regulations have proved effective as San Francisco has reduced its GHG emissions by 41 percent below 1990 levels, which far exceed statewide and regional 2020 GHG reduction targets. Furthermore, the city's GHG emission reductions in 2019 also met statewide and regional 2030 targets more than 10 years in advance of the target year. Therefore, because the proposed project would be subject to regulations adopted to reduce GHG emissions, the proposed project would be consistent with San Francisco's GHG reduction

90 San Francisco Planning Department, *Greenhouse Gas Analysis: Compliance Checklist for 2021-001922ENV*, August 17, 2022.

strategy and would not generate significant GHG emissions nor conflict with state, regional, and local GHG reduction plans and regulations.

Therefore, because the proposed project would be consistent with the City's GHG reduction strategy, it would also be consistent with the GHG reduction goals of executive orders S-3-05, B-30-15, B-55-18, California Global Warming Solutions Act of 2016, and the clean air plan, would not conflict with these plans. As such, the proposed project impact would be less than significant with respect to GHG emissions, and no mitigation would be required.

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact	Not Applicable
9. WIND. Would the project:					
a) Create wind hazards in publicly accessible areas of substantial pedestrian use?	☐	☐	☒	☐	☐

Impact WI-1: The proposed project would not create wind hazards in publicly accessible areas of substantial pedestrian use. (*Less than Significant*)

A project's wind impacts are related directly to its height, orientation, design, location, and surrounding development context. Based on wind analyses for other infill development projects in San Francisco, a building that does not exceed a height of 85 feet generally has little potential to cause substantial changes in ground-level wind conditions. The proposed project would demolish an existing 19-foot-tall building and construct a new 40-foot-tall building that would be similar in height to existing buildings in the vicinity. Due to the east-to-west upward slope of California Street, the adjacent Laurel Inn to the west would be about 10 feet taller than the proposed building. The Laurel Inn would shelter the proposed building from prevailing westerly winds. Due to this sheltering effect, the proposed project would have little to no potential to intercept overhead winds and redirect them downward to the California Street sidewalk. Given its height and surrounding development context, the proposed project would not cause substantial changes to ground-level wind conditions adjacent to the project site. Therefore, the proposed project would not create wind hazards in publicly accessible areas of substantial pedestrian use. The impact would be less than significant. No mitigation would be required.

Impact C-WI-1: The proposed project, combined with cumulative projects, would not result in significant cumulative impacts related to wind. (*Less than Significant*)

The cumulative context for wind impacts would be local and limited to the immediate project vicinity. Cumulative projects within 0.25 mile of the project site are listed in Section 0, Project Setting and they include 3333 California Street, 726 Presidio Avenue, and 2601 Sutter Street. Cumulative wind impacts could occur if the proposed project, in combination with cumulative projects, would result in above-ground facilities that would create wind hazards in publicly accessible areas of substantial pedestrian use.

Both 726 Presidio Avenue and 2601 Sutter Street cumulative projects would include construction of buildings of approximately 40 feet in height. In addition, 726 Presidio Avenue is approximately 900 feet south of the project site, and 2601 Sutter Street is approximately 1,250 feet southeast of the project site. The buildings at 2601 Sutter Street and 726 Presidio Avenue would not be tall enough or close enough to the project site to combine with the proposed project to create wind hazards in publicly accessible areas of substantial pedestrian use. The 3333 California Street project would construct several buildings ranging from 37 to 92 feet in height. The tallest 3333 California Street building would be in the center of the property, more than 500 feet southwest of the project site. Wind speeds with the addition of the 3333 California Street buildings are anticipated to be similar to existing wind conditions and would not exceed San Francisco's wind hazard

level of 26 miles per hour at any time throughout the year.^{91,92} At a height of 40 feet, the proposed 3150 California Street building would be similar to the heights of the surrounding buildings in the neighborhood and would not be tall enough or close enough to interact with the 3333 California Street project to create wind hazards in publicly accessible areas of substantial pedestrian use. For these reasons, the proposed project would not combine with past, present, and reasonably foreseeable future projects in the project vicinity to create a significant cumulative wind impact. The impact would be cumulatively less than significant. No mitigation would be required.

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact	Not Applicable
10. SHADOW. Would the project:					
a) Create new shadow that substantially and adversely affects the use and enjoyment of publicly accessible open spaces?	☐	☐	☒	☐	☐

Impact SH-1: The proposed project would not create new shadow that substantially and adversely affects the use and enjoyment of publicly accessible open spaces. (*Less than Significant*)

Section 295 of the planning code, the Sunlight Ordinance, was adopted in 1984 following voter approval of Proposition K to protect certain public open spaces from shadowing new structures. The ordinance generally prohibits structures greater than 40 feet in height that would cast additional shadows on property under the jurisdiction of the San Francisco Recreation and Parks Department from one hour after sunrise until one hour before sunset at any time during the year unless the San Francisco Recreation and Park Commission determines that the shadow would not have an adverse effect on the use of such property.

The proposed project would construct a new 40-foot-tall building at the project site; the proposed building would not be tall enough to cast shadow that would reach any public parks or open spaces in the project vicinity.⁹³ Although the proposed project would shade portions of streets, sidewalks, and private properties in the project vicinity at various times of the day throughout the year, these shadows would not exceed levels commonly expected in urban areas. Although occupants of nearby properties may regard the increase in shadow as undesirable, the limited increase in shading of private properties as a result of the proposed project would not be considered a significant impact under CEQA. For these reasons, the proposed project would not create new shadow that substantially and adversely affects the use and enjoyment of publicly accessible open spaces. The impact would be less than significant. No mitigation would be required.

91 San Francisco Planning Code, Article 1.2: Dimensions, Areas, and Open Spaces, Section 148.

92 San Francisco Planning Department, 2018, Initial Study, 3333 California Street Mixed Use Project, Planning Department Case No. 2015-014028ENV.

93 San Francisco Planning Department, Shadow Fan for 3150 California Street, January 31, 2022.

Impact C-SH-1: The proposed project, combined with cumulative projects, would not result in significant cumulative impacts related to shadow. (*Less than Significant*)

Cumulative shadow impacts occur when two or more projects shadow the same area. As described under Impact SH-1, the proposed project would not cast any new shadow on any publicly accessible open space. Accordingly, the proposed project would not contribute to any potential cumulative impacts associated with the creation of a new shadow. The sidewalks in the project vicinity are already shadowed for portions of the day by multi-story buildings. Although implementation of the proposed project and nearby cumulative development projects would add new shadow to the sidewalks in the project vicinity, these shadows would be transitory in nature, would not substantially affect the use of the sidewalks, and would not increase shadows above levels that are common and generally expected in a densely developed urban environment. For these reasons, the proposed project would not combine with past, present, and reasonably foreseeable future projects in the project vicinity to create a significant cumulative shadow impact. No mitigation would be required.

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact	Not Applicable
11. RECREATION. Would the project:					
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated?	☐	☐	☒	☐	☐
b) Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?	☐	☐	☒	☐	☐

Impact RE-1: The proposed project would not increase the use of existing neighborhood and regional parks and other recreational facilities, to such an extent that substantial physical deterioration of the facilities would occur or be accelerated. (*Less than Significant*)

The neighborhood parks and other recreational facilities closest to the project site include the Presidio Library Mini Park (0.1 miles northeast), Presidio Heights Playground (0.2 miles northwest), Bush & Broderick Mini Park (0.25 miles southeast), Laurel Hill Playground (0.35 miles southwest), Alta Plaza Park (0.5 miles east), and the Julius Kahn Playground (0.5 miles northwest).⁹⁴ The proposed project would gradually increase the enrollment of SFUHS from 410 to 550 students over a period of 5 to 10 years. The proposed project also would include the addition of 33 staff (i.e., 21 teachers, four administrative staff, and eight staff members), to accommodate the increase in enrollment. The additional 173 students and staff occasionally may use the parks, open spaces, and other recreational facilities in the project vicinity, but their use by students would be modest, based on the increase in students relative to the overall population in the project

94 San Francisco Recreation and Park Department, 2021, Parks and Facilities Website, available at: <https://sfrecpark.org/facilities>, accessed on November 16, 2021.

area. The proposed project would include construction of athletic facilities and a roof terrace for students and staff to use during school hours and is expected to offset the demand for recreational facilities outside the SFUHS campus. The additional students and staff also would be distributed among all the SFUHS campus buildings, many of which also provide open spaces for students and SFUHS employees. The proposed project would not induce population growth in the project area to an extent that would substantially increase the use of existing parks and recreational facilities, or to such an extent that substantial physical deterioration of the facilities would occur or be accelerated. The impact would be less than significant. No mitigation would be required.

Impact RE-2: The proposed project would not include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment. (*Less than Significant*)

The proposed project would provide athletic facilities and a roof terrace that would be accessible only to SFUHS students, staff, and occasional visitors and not to the general public. Thus, the proposed project may reduce some use of nearby public recreational facilities by SFUHS students and staff, which would offset potential impacts on public recreational facilities resulting from the increase in student enrollment and staff employment. The proposed project would not require the construction of new or the expansion of existing recreational facilities in the project vicinity. Therefore, the proposed project would not cause any adverse physical effects on the environment related to the construction or expansion of recreational facilities. The impact would be less than significant. No mitigation would be required.

Impact C-RE-1: The proposed project, combined with cumulative projects, would not result in significant cumulative impacts related to recreation. (*Less than Significant*)

The geographic scope of potential recreational impacts would include the project site and the recreational resources in the Pacific Heights neighborhood of San Francisco. Implementation of the proposed project and cumulative development in the project vicinity would result in construction of 751 residential units, 35,000 square feet of commercial space, 15,000 square feet of childcare, and 48,000 square feet of educational space. Cumulative development in the project vicinity would intensify land uses, and a cumulative increase in the demand for recreational facilities and resources would occur. The City has accounted for such growth as part of the Recreation and Open Space Element of the *General Plan*.⁹⁵ In addition, San Francisco voters passed two bond measures, in 2008 and 2012, to fund the acquisition, planning, and renovation of the City's network of recreational resources.

As discussed above, six recreational facilities are within 0.5 mile of the project site. The existing recreational facilities are expected to be able to accommodate the increase in demand for recreational resources generated by nearby cumulative development projects. Similar to the proposed project, cumulative projects in the area would be subject to planning code open space requirements regarding the provision of public and/or private open space. The 3333 California Street project site would include approximately 236,000 square feet of open space, and the 2601 Sutter Street project would include approximately 979 square feet of open space. The provision of the planning code-required open space would partially meet the demand for

95 San Francisco Planning Department, *San Francisco General Plan*, Recreation and Open Space Element, April 2014, pp. 20-36. Available online at http://generalplan.sfplanning.org/Recreation_OpenSpace_Element_ADOPTED.pdf, accessed January 24, 2022.

recreational resources and offset the potential for deterioration and/or degradation of existing recreational resources in the project area.

As discussed under Impact RE-1 and Impact RE-2, the proposed project would not substantially increase the use of existing neighborhood and regional parks or other recreational facilities and would not include or require construction or expansion of recreational facilities that may have an adverse physical effect on the environment. Thus, when considered in combination with other past, present, or reasonably foreseeable future projects, the proposed project would not contribute considerably to a cumulative impact on recreation. The impact would be less than significant. No mitigation would be required.

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact	Not Applicable
12. UTILITIES AND SERVICE SYSTEMS. Would the project:					
a) Require or result in the relocation or construction of new or expanded, water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐	☐
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	☐	☐	☒	☐	☐
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐	☐
d) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐	☐
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐	☐

Impact UT-1: The proposed project would not require or result in the relocation or construction of new or expanded, water, wastewater treatment, or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects. (*Less than Significant*)

Water Supply

Water service for the proposed project site would be provided by the San Francisco Public Utilities Commission (SFPUC). As described in Section A, Project Description, the proposed project would increase the SFUHS population by 173 students and staff, who would be distributed between all SFUHS campus

buildings. The existing water facilities would be sufficient to provide water service to accommodate the increased use, and no new or expanded water supply facilities would be required. Additionally, the anticipated increase in water use associated with the proposed project would be partially offset by the removal of the existing uses at the site and their associated water use. Although the project site currently is developed and already is served by existing utilities, the proposed project would require the modification of existing on-site water supply facilities to provide service to the newly constructed building. The impact would be less than significant. No mitigation would be required.

Wastewater and Stormwater

Wastewater and stormwater generated at the project site would be treated at the SFPUC's Southeast Water Pollution Control Plant, which would have adequate capacity to treat wastewater coming from the project site. The SFUHS population students and staff increase would result in an incremental increase in wastewater generated during project operation, but the increase would be only slightly more than the existing amount and would be minimal in comparison to that generated by the local population. Additionally, the anticipated increase in wastewater generation associated with the proposed project would be partially offset by the removal of the existing uses at the site and their associated wastewater generation.

The project site is paved and covered with impervious surfaces, and the proposed project would not create any additional impervious surfaces. The proposed project would replace more than 5,000 square feet of impervious surface and would be required to comply with the City's stormwater management ordinance (ordinance no. 83-10) and the 2016 Stormwater Management Requirements and Design Guidelines⁹⁶, which would require the proposed project to reduce or eliminate the existing volume and rate of stormwater runoff discharged from the project site. To achieve these objectives, the proposed project would be required to implement and install appropriate stormwater management systems that would retain runoff on site, promote stormwater re-use, and limit site discharges from entering the City's combined stormwater/sewer system. This would minimize stormwater runoff into San Francisco's combined and separate sewer systems. The proposed project would not require the construction of new or expanded wastewater treatment or stormwater drainage facilities. The impact would be less than significant. No mitigation would be required.

Electrical Power, Natural Gas, and Telecommunications

During project operation, the continued use of electrical power and telecommunications services would be required. Operation of the proposed project would not require any natural gas service. PG&E provides electricity to the project site, and various private companies provide telecommunications services. The project site already is served by existing utilities and the proposed project would require new connections to the on-site electric and telecommunications infrastructure, to provide services to the new building. Additionally, the anticipated increase in electrical power use associated with the proposed project would be partially offset by the removal of the existing uses at the site and their associated electrical power use. The proposed project would not require or result in relocation or construction of any other new or expanded electricity, natural gas, or telecommunications infrastructure during construction or operation. The impact would be less than significant. No mitigation would be required.

96 San Francisco Public Utilities Commission, San Francisco Stormwater Management Requirements and Design Guidelines, Urban Watershed Management Program, available at <https://sfport.com/node/5558>, May 2016.

Impact UT-2: The proposed project would have sufficient water supplies available to serve the proposed project and reasonably foreseeable future development during normal, dry, and multiple dry years. (*Less than Significant*)

The San Francisco Public Utilities Commission (SFPUC) adopted the 2020 Urban Water Management Plan (2020 plan) in June 2021.⁹⁷ The 2020 plan estimates that current and projected water supplies will be sufficient to meet future demand for retail water⁹⁸ customers through 2045 under wet- and normal-year conditions; however, in dry years, the SFPUC would implement water use and supply reductions through its Water Shortage Contingency Plan and a corresponding Retail Water Shortage Allocation Plan.⁹⁹

In December 2018, the State Water Resources Control Board adopted amendments to the Water Quality Control Plan for the San Francisco Bay/Sacramento-San Joaquin Delta Estuary, which establishes water quality objectives to maintain the health of our rivers and the Bay-Delta ecosystem (the bay-delta plan amendment).¹⁰⁰ The state water board has indicated that it intends to implement the bay-delta plan amendment by the year 2022, assuming all required approvals are obtained by that time. Implementation of the bay-delta plan amendment would result in a substantial reduction in the SFPUC's water supplies from the Tuolumne River watershed during dry years, requiring rationing to a greater degree in San Francisco than previously anticipated to address supply shortages.

Implementation of the bay-delta plan amendment is uncertain for several reasons and whether, when, and the form in which the bay-delta plan amendment would be implemented, and how those amendments could affect SFPUC's water supply, is currently unknown. In acknowledgment of these uncertainties, the 2020 plan presents future supply scenarios both with and without the bay-delta plan amendment, as follows:

Without implementation of the bay-delta plan amendment wherein the water supply and demand assumptions contained in Section 8.4 of the 2020 plan would be applicable

With implementation of a voluntary agreement between the SFPUC and the State Water Resources Control Board that would include a combination of flow and non-flow measures that are designed to benefit fisheries at a lower water cost, particularly during multiple dry years, than would occur under the bay-delta plan amendment)

With implementation of the bay-delta plan amendment as adopted wherein the water supply and demand assumptions contained in Section 8.3 of the 2020 plan would be applicable

97 SFPUC, *2020 Urban Water Management Plan for the City and County of San Francisco*, adopted June 11, 2021. This document is available at [Urban Water Management Plan | SFPUC](#).

98 "Retail" demand represents water the SFPUC provides to individual customers within San Francisco. "Wholesale" demand represents water the SFPUC provides to other water agencies supplying other jurisdictions.

99 San Francisco Public Utilities Commission, *2020 Urban Water Management Plan for the City and County of San Francisco, Appendix K – Water Shortage Contingency Plan*, adopted June 11, 2021. This document is available at [Urban Water Management Plan | SFPUC](#).

100 State Water Resources Control Board Resolution No. 2018-0059, Adoption of Amendments to the Water Quality Control Plan for the San Francisco Bay/Sacramento-San Joaquin Delta Estuary and Final Substitute Environmental Document, December 12, 2018, available at https://www.waterboards.ca.gov/plans_policies/docs/2018wqcp.pdf.

Water supply shortfalls during dry years would be lowest without implementation and highest with implementation of the bay-delta plan amendment. Shortfalls under the proposed voluntary agreement would be between those with and without implementation of the bay-delta plan amendment.¹⁰¹

Under these three scenarios, the SFPUC would have adequate water to meet demand in San Francisco through 2045 in wet and normal years.¹⁰² Without implementation of the bay-delta plan amendment, water supplies would be available to meet demand in all years except for a 4.0 million gallons per day (5.3 percent) shortfall in years four and five of a multiple year drought based on 2045 demand.

With implementation of the bay-delta plan amendment, shortfalls would range from 11.2 million gallons per day (15.9 percent) in a single dry year to 19.2 million gallons per day (27.2 percent) in years two through five of a multiple year drought based on 2025 demand levels and from 20.5 million gallons per day (25.4 percent) in a single dry year to 28.5 million gallons per day (35.4 percent) in years four and five of a multiple year drought based on 2045 demand.

The proposed project does not require a water supply assessment under the California Water Code. Under sections 10910 through 10915 of the California Water Code, urban water suppliers like the SFPUC must prepare water supply assessments for certain large “water demand” projects, as defined in CEQA Guidelines section 15155.¹⁰³ The proposed project would result in approximately 48,000 square feet of institutional space; as such it does not qualify as a “water-demand” project as defined by CEQA Guidelines section 15155(a)(1) and a water supply assessment is not required and has not been prepared for the project. The following discussion considers the potential water supply impacts for projects – such as the proposed project – that do not qualify as “water-demand” projects.

No single development project alone in San Francisco would require the development of new or expanded water supply facilities or require the SFPUC to take other actions, such as imposing a higher level of rationing across the city in the event of a supply shortage in dry years. Therefore, a separate project-only analysis is not provided for this topic. The following analysis instead considers whether the proposed project in combination with both existing development and projected growth through 2045 would require new or expanded water supply facilities, the construction or relocation of which could have significant impacts on

101 On March 26, 2019, the SFPUC adopted Resolution No. 19-0057 to support its participation in the voluntary agreement negotiation process. To date, those negotiations are ongoing under the California Natural Resources Agency. The SFPUC submitted a proposed project description that could be the basis for a voluntary agreement to the state water board on March 1, 2019. As the proposed voluntary agreement has yet to be accepted by the state water board as an alternative to the Bay-Delta Plan Amendment, the shortages that would occur with its implementation are not known with certainty; however, if accepted, the voluntary agreement would result in dry year shortfalls of a lesser magnitude than under the Bay-Delta Plan Amendment.

102 Based on historic records of hydrology and reservoir inflow from 1920 to 2017, current delivery and flow obligations, and fully implemented infrastructure under the 2018 Phased Water System Improvement Program Variant, normal or wet years occurred 85 out of 97 years. This translates into roughly nine normal or wet years out of every 10 years. Conversely, system-wide rationing is required roughly one out of every 10 years. This frequency is expected to increase as climate change intensifies.

103 Pursuant to CEQA Guidelines section 15155(1), “a water-demand project” means:

(A) A residential development of more than 500 dwelling units.

(B) A shopping center or business establishment employing more than 1,000 persons or having more than 500,000 square feet of floor space.

(C) A commercial office building employing more than 1,000 persons or having more than 250,000 square feet of floor area.

(D) A hotel or motel, or both, having more than 500 rooms, (e) an industrial, manufacturing, or processing plant, or industrial park planned to house more than 1,000 persons, occupying more than 40 acres of land, or having more than 650,000 square feet of floor area.

(F) a mixed-use project that includes one or more of the projects specified in subdivisions (a)(1)(A), (a)(1)(B), (a)(1)(C), (a)(1)(D), (a)(1)(E), and (a)(1)(G) of this section.

(G) A project that would demand an amount of water equivalent to, or greater than, the amount of water required by a 500 dwelling unit project.

the environment. It also considers whether a high level of rationing would be required that could have significant cumulative impacts. It is only under this cumulative context that development in San Francisco could have the potential to require new or expanded water supply facilities or require the SFPUC to take other actions, which in turn could result in significant physical environmental impacts related to water supply. If significant cumulative impacts could result, then the analysis considers whether the project would make a considerable contribution to the cumulative impact.

Based on guidance from the California Department of Water Resources and a citywide demand analysis, the SFPUC has established 50,000 gallons per day as the maximum water demand for projects that do not meet the definitions provided in CEQA Guidelines section 15155(a)(1).¹⁰⁴ The development proposed by the project would represent 19.2 percent of the 250,000 square feet of office space provided in section 15155(1)(C). In addition, the proposed project would incorporate water-efficient fixtures as required by Title 24 of the California Code of Regulations and the city's Green Building Ordinance. It is therefore reasonable to assume that the proposed project would result in an average daily demand of substantially less than 50,000 gallons per day of water.

Assuming the project would demand no more than 50,000 gallons of water per day, its water demand would represent a small fraction of the total projected demand, ranging at most from 0.07 to 0.06 percent between 2025 and 2045. As such, the project's water demand would not require or result in the relocation or construction of new or expanded water facilities the construction or relocation of which could cause significant environmental effects.

Sufficient water supplies are available to serve the proposed project and reasonably foreseeable future development in normal, dry, and multiple dry years unless the bay-delta plan amendment is implemented. As indicated above, the proposed project's maximum demand would represent less than 0.06 percent of the total demand in 2045 when the retail supply shortfall projected to occur with implementation of the bay-delta plan amendment would be up to 35.4 percent in a multi-year drought. The SFPUC has indicated that it is accelerating its efforts to develop additional water supplies and explore other projects that would improve overall water supply resilience through an alternative water supply program. The SFPUC has taken action to fund the study of additional water supply projects, but it has not determined the feasibility of the possible projects and has determined that the identified potential projects would take anywhere from 10 to 30 years or more to implement. The potential impacts that could result from the construction and/or operation of any such water supply facility projects cannot be identified at this time. In any event, under such a worst-case scenario, the demand for the SFPUC to develop new or expanded dry-year water supplies would exist regardless of whether the proposed project is constructed.

Given the long lead times associated with developing additional water supplies, in the event the bay-delta plan amendment were to take effect sometime after 2022 and result in a dry-year shortfall, the expected action of the SFPUC for the next 10 to 30 years (or more) would be limited to requiring increased rationing. As discussed in the SFPUC memorandum, the SFPUC has established a process through its Retail Water Shortage Allocation Plan for actions it would take under circumstances requiring rationing. The level of rationing that would be required of the proposed project is unknown at this time. Both direct and indirect environmental impacts could result from high levels of rationing. However, the small increase in potable

104 Memorandum, from Steven R. Ritchie, Assistant General Manager, Water Enterprise, San Francisco Public Utilities Commission to Lisa Gibson, Environmental Review Officer, San Francisco Planning Department – Environmental Planning, May 31, 2019.

water demand attributable to the project compared to citywide demand would not substantially affect the levels of dry-year rationing that would otherwise be required throughout the city. Therefore, the proposed project would not make a considerable contribution to a cumulative environmental impact caused by implementation of the bay-delta plan amendment. Project impacts related to water supply would be less than significant.

Impact UT-3: The proposed project would not result in a determination by the wastewater treatment provider which serves or may serve the proposed project that it has inadequate capacity to serve the proposed project's projected demand in addition to the provider's existing commitments. (*Less than Significant*)

As discussed under Impact UT-1 and Impact UT-2, project implementation would increase the number of students and staff by 173 persons, which would result in a slight increase in wastewater flows from the project site. The proposed project would incorporate water-efficient fixtures, as required under Title 24 of the California code of regulations and the San Francisco green building ordinance. Compliance with these regulations would reduce wastewater flows to the southeast plant. The SFPUC's infrastructure capacity plans account the City's projected population and employment growth. Project implementation would not exceed the capacity of the Southeast Water Pollution Control Plant to treat wastewater flows from the project site. The impact would be less than significant. No mitigation would be required.

Impact UT-4: The proposed project would not generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. (*Less than Significant*)

In September 2015, the City of San Francisco approved an agreement with Recology for transport and disposal of municipal solid waste at Recology's Hay Road Landfill in Solano County. Under this agreement, disposal of municipal solid waste will continue through September 2024, or until 3.4 million tons have been disposed, whichever occurs first. The City has an option to renew the agreement for a period of 6 years or until an additional 1.6 million tons have been disposed, whichever occurs first.¹⁰⁵ The Recology Hay Road Landfill is permitted to accept up to 2,400 tons per day of solid waste. At that maximum permitted rate, the landfill has the capacity to accommodate solid waste until approximately 2034. Under existing conditions, the landfill receives an average of approximately 1,850 tons per day from all sources, with approximately 1,200 tons per day from San Francisco, which includes residential and commercial waste and demolition and construction debris that cannot be reused or recycled.¹⁰⁶ At the current rate of disposal, the landfill has operating capacity until 2041. Assuming the renewal the agreement noted above, the City's contract with the Recology Hay Road Landfill will extend until 2031 or when the City has disposed 5 million tons of solid waste, whichever occurs first. At that point, the City would either further extend the landfill contract or find and entitle an alternative landfill site.

¹⁰⁵ City and County of San Francisco, July 22, 2015, Landfill Disposal Agreement between the City and County of San Francisco and Recology San Francisco.

¹⁰⁶ San Francisco Planning Department, May 21, 2015, Disposal of San Francisco Municipal Waste at Recology Hay Road Landfill in Solano County. Final Negative Declaration, Planning Department Case No. 2014.053.

Project construction would result in approximately 14,000 cubic yards of construction and demolition debris and 14,000 cubic yards of excavated soil material. The Hay Road Landfill would have sufficient capacity to accept the excavated soil and demolition material from construction. The proposed project would also be required to abide by the City of San Francisco's Construction and Demolition Debris Recovery Ordinance (No. 27-06), which requires the submittal of a waste diversion plan to the San Francisco Department of the Environment that provides for a minimum of 65 percent diversion from landfill of construction and demolition debris, and source separation for reuse or recycling. The proposed project would also comply with ordinance 100-09 Mandatory Recycling and Composting, which requires all San Francisco persons to separate solid waste into recyclables, compostables, and landfill trash. Compliance with these ordinances would reduce the amount of solid waste generated by project construction and operation. The proposed project would not generate solid waste in excess of state or local statutes and regulations or the capacity of local infrastructure. The impact would be less than significant.

Impact UT-5: The proposed project would comply with federal, state, and local management and reduction statutes and regulations related to solid waste. (*Less than Significant*)

San Francisco introduced its Advancing Towards Zero Waste Declaration in 2018, which aims to reduce municipal solid waste by 15 percent by 2030 and reduce landfill disposal by 50 percent by 2030.¹⁰⁷ As discussed under Impact UT-4, the proposed project would comply with the San Francisco construction and demolition debris recovery ordinance (ordinance 27-06) and the Mandatory Recycling and Composting ordinance (ordinance 100-09), which would support San Francisco's zero waste goals. In addition, the Hay Road Landfill is permitted for the types of waste that would be generated by the proposed project. Project construction and operation would comply with all federal, state, and local requirements and regulations related to solid waste, including the California Integrated Waste Management Act of 1989 (Assembly Bill 939). The impact would be less than significant. No mitigation would be required.

Impact C-UT-1: The proposed project, in combination with cumulative projects, would not result in significant cumulative impacts on utilities and service systems. (*Less than Significant*)

The geographic scope of cumulative impacts on water, wastewater treatment, and stormwater drainage facilities is the Bayside Drainage Basin. For landfill capacity and solid waste, the geographic scope includes Recology's Hay Road Landfill in Solano County (that serves San Francisco), where recycling, re-use, and disposal of construction-related waste would occur.

Water Supply

As discussed under Impact UT-2, no single development project alone in San Francisco would require the development of new or expanded water supply facilities. The analysis provided in Impact UT-2 considers whether the proposed project, in combination with both existing infrastructure and projected growth through 2045, would require new or expanded water supply facilities, the construction or relocation of which could have significant cumulative impacts on the environment. Therefore, no separate cumulative analysis is required. As discussed under Impact UT-2, the proposed project would not make a considerable contribution to a cumulative impact related to water supply.

¹⁰⁷ C40 Cities, Advancing Towards Zero Waste Declaration, 2018, available at https://c40-production-images.s3.amazonaws.com/other_uploads/images/1851_Zero_Waste_declaration_FINAL_5July.original.pdf?1530818554.

Wastewater and Stormwater

The City's combined sewer system and treatment facilities are designed to accept both wastewater and stormwater flows. As with the proposed project, all reasonably foreseeable projects in the drainage basin would be required to comply with San Francisco regulations regarding wastewater and stormwater generation. As discussed under Impact UT-1, the proposed project would have a less-than-significant impact on wastewater treatment or stormwater drainage facilities, and therefore it would not contribute substantially to any potential cumulative impacts on those facilities. Therefore, the cumulative impact would be less than significant. No mitigation would be required.

Electric Power, Natural Gas, and Telecommunication

The proposed project would not require construction of new or expanded electrical, natural gas, or telecommunications facilities but may require modifications to the existing facilities. These modifications would not be capacity-related. Although cumulative projects may require expansions to existing electrical, natural gas, and telecommunications facilities or infrastructure that could result in a significant cumulative impact, existing utility and service management plans would be designed to accommodate the utility and service demands of anticipated growth throughout San Francisco from new development. The proposed project would not make a cumulatively considerable contribution to electrical, natural gas, and telecommunications facilities or infrastructure impacts. Therefore, the proposed project, in combination with the cumulative projects, would have a less-than-significant cumulative impact. No mitigation would be required.

Solid Waste

As discussed under Impact UT-4, the proposed project would have minor effects related to compliance with solid waste statutes and regulations. Therefore, the proposed project would not contribute to any potential cumulative impacts related to compliance with solid waste statutes and regulations. The impact would be less than significant. No mitigation would be required.

The proposed project and the cumulative projects would generate construction waste, which would be disposed in offsite disposal facilities. All projects would be required to comply with San Francisco's construction and demolition debris recovery and recycling and composting ordinances. As with the proposed project, the cumulative projects' compliance with these ordinances would reduce their solid waste generation from construction and operation.

Although cumulative development projects could incrementally increase total waste generation from the city by increasing the number of residents, the amount of solid waste being processed by landfills would remain comparable to existing conditions. Therefore, the proposed project, in combination with other past, present, and reasonably foreseeable future projects, would not result in a significant cumulative impact on utilities and service systems. No mitigation would be required.

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact	Not Applicable
13. PUBLIC SERVICES. Would the project:					
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services such as fire protection, police protection, schools, parks, or other public facilities?	☐	☐	☒	☐	☐

The proposed project would be serviced by the San Francisco Police Department. The nearest San Francisco police station is the Richmond Station, approximately 1.5 miles southwest of the project site.¹⁰⁸ The project site receives fire protection and emergency services from the San Francisco Fire Department Battalion 5. The nearest San Francisco fire station is Station 10 at 655 Presidio Avenue, approximately 0.1 miles south of the project site.¹⁰⁹

Impact PS-1: The proposed project would not increase the demand for public services to such an extent that construction of new or physically altered facilities would be required. (*Less than Significant*)

The proposed project would increase SFUHS enrollment by 140 students and include the addition of 33 SFUHS employees, which would increase the demand for fire protection, emergency services, and police protection during school operation. The increase in demand would not be substantial, considering the existing demand for public services in San Francisco. Fire protection, emergency medical, and police protection resources are regularly redeployed based on need in order to maintain acceptable service ratios.

Furthermore, the proposed project would be subject to and would comply with the regulations of the California fire code, which establishes requirements pertaining to fire protection systems, including the provision of state-mandated fire alarms, fire extinguishers, appropriate building access and egress, and emergency response notification systems, as determined by the San Francisco Fire Department. The proximity of the proposed project to fire protection services would minimize response times in the event of any incident. The proposed project would not require construction or alteration of a fire station or affect response times, service ratios, or other performance objectives related to fire protection services.

With the addition of students, faculty, and staff, the proposed project may result in an increase in demand for police protection services. The proposed project would be serviced by the San Francisco Police Department's Richmond Station. The increase in demand resulting from the proposed project would not be substantial,

¹⁰⁸ San Francisco Police Department, 2021, Station Finder, available at: <https://www.sanfranciscopolice.org/your-sfpd/sfpd-stations/station-finder>, accessed November 10, 2021.

¹⁰⁹ San Francisco Fire Department, 2021, Fire Station Locations, available at: Fire Station Locations | SF Fire Website (sf-fire.org), accessed November 10, 2021.

based on the overall demand for police services on a citywide basis. Thus, the proposed project would not require construction of new, or alteration of existing police protection facilities.

The increase in enrollment due to the proposed project would increase the demand for other public facilities, such as parks and libraries. As described under Impact RE-1, the proposed project would include construction of athletic facilities and a roof terrace that would offset the demand for parks and recreational facilities outside the SFUHS campus. Regarding library services, the San Francisco Public Library operates the Main Library and 27 branches throughout San Francisco.¹¹⁰ It is anticipated that the Presidio branch (0.1 mile northeast of the project site) would be able to accommodate the minor increase in demand for library services generated by the proposed project. SFUHS students and faculty would also have access to the Dennis A. Collins library located in the SFUHS Middle Building, which would accommodate the increase in students and staff. The increase in demand for public facilities would not be substantial, based on the overall demand for public facilities on a citywide basis. Therefore, project implementation would not require construction of new, or alteration of existing public facilities. The impact would be less than significant. No mitigation would be required.

Impact C-PS-1: The proposed project, combined with cumulative projects, would not result in significant cumulative impacts on police, fire, and school district services such that new or physically altered facilities, the construction of which could cause significant environmental impacts, would be required in order to maintain acceptable levels of service. (*Less than Significant*)

The cumulative context for project-related public services impacts would include the areas served by police districts, fire stations, schools, parks, and libraries. Project implementation, in combination with cumulative projects' development in the project vicinity, would result in an incremental increase in population and demand for fire protection, police protection, school services, parks, and library services. The fire department, police department, the San Francisco Unified School District, and other City agencies have accounted for such growth in providing public services to the residents of San Francisco. Fire protection, emergency medical, and police protection resources are regularly redeployed based on need in order to maintain acceptable service ratios. Nearby cumulative development projects would be subject to development impact fees to mitigate the impacts of new development on public services and infrastructure.¹¹¹ In addition, project operation would not result in the need for new or altered public service facilities. For these reasons, the proposed project would not combine with past, present, and reasonably foreseeable future projects in the project vicinity to create a significant cumulative impact on public services. The cumulative impact would be less than significant. No mitigation would be required.

110 San Francisco Public Library, available at <https://sfpl.org/>, accessed on January 28, 2022.

111 San Francisco Planning Department, 2021, Development Impact Fees, available at: <https://sfplanning.org/project/development-impact-fees>, accessed November 11, 2021.

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact	Not Applicable
14. BIOLOGICAL RESOURCES. Would the project:					
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☐	☒	☐
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☐	☐	☒
c) Have a substantial adverse effect on federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☐	☒
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☒	☐	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☒	☐	☐
f) Conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☐	☒

The project site is paved, features a building and parking lot, and is within a built urban environment. The project site does not contain any riparian habitat, other sensitive natural community, or federally protected wetlands. No adopted habitat conservation plans, natural community conservation plans, or other approved local, state, or regional habitat conservation plans apply to the project site. Therefore, topics E.14.b, E.14.c, and E.14.f are not applicable to the proposed project.

Impact BI-1: The proposed project would not have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service. (No Impact)

The project site is covered entirely by impervious surfaces and is in a built urban environment with high levels of human activity. Because of the developed nature of the project site and the surrounding area, the

project site does not provide suitable habitat for any rare or endangered plant or wildlife species. No impact would occur.

Impact BI-2: The proposed project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites. (*Less than Significant*)

Although the project site is within a highly urbanized landscape and does not provide suitable habitat for wildlife movement, migratory birds may pass through the project area. San Francisco is within the Pacific Flyway, a major north-south route of travel for migratory birds along the western portion of the Americas. The project site is fully developed and is not considered an urban bird refuge.¹¹²

The street trees along California Street could support habitat for migratory nesting birds protected under the California Fish and Game Code or the Migratory Bird Treaty Act. Although construction noise has the potential to affect nesting behavior in adjacent trees, the project site is next to the busy California Street traffic corridor, which is likely to be selected for nesting only by birds that are well-habituated to traffic noise. Any such birds also are likely to be unaffected by construction noise at the project site. The street trees would be retained, and the proposed project would not affect habitat for migratory nesting birds.

Structures in an urban setting may present risks for birds as they traverse their migratory paths, because of building location and/or features. The City has adopted guidelines to address this issue and provided regulations for bird-safe design within the city.¹¹³ Section 139, Standards for Bird-Safe Buildings, of the planning code establishes building design standards to reduce avian mortality rates associated with bird strikes. The building standards are based on two types of hazards: (1) location-related hazards that pertain to new buildings within 300 feet of an urban bird refuge, and (2) feature-related hazards, such as freestanding glass walls, wind barriers, skywalks, balconies, and greenhouses on rooftops that have unbroken glazed segments 24 square feet or larger. Any project that contains building-feature hazards must apply bird-safe glazing treatments on 100 percent of the feature, in compliance with section 139.

The project site is not within 300 feet of an urban bird refuge; therefore, the standards for location-related hazards would not apply.¹¹⁴ The proposed project would be required to comply with the section 139 building feature-related hazard standards by using bird-safe glazing treatments on 100 percent of any building feature-related hazards, such as free-standing glass walls, wind barriers, and balconies. Compliance with the City's bird-safe building standards would ensure that the proposed project would not interfere with the movement of a native resident or wildlife species, or with an established native resident or migratory wildlife corridor.

For the reasons stated above, the proposed project would not interfere with the movement of native resident or wildlife species or with established native resident or migratory wildlife corridors. The impact would be less than significant. No mitigation would be required.

112 An urban bird refuge is defined by San Francisco Planning Code Section 139(c)(1) as an open spaces two acres and larger dominated by vegetation, including vegetated landscaping, forest, meadows, grassland, or wetlands, or open water.

113 San Francisco Planning Department, 2020, Standards for Bird-Safe Buildings, available at: http://default.sfplanning.org/publications_reports/bird_safe_bldgs/Standards%20for%20Bird%20Safe%20Buildings%20-%2011-30-11.pdf. Accessed November 2020.

114 San Francisco Planning Department, 2014, Urban Bird Refuge Map, available at: <https://sfplanning.org/sites/default/files/resources/2018-08/Urban%20Bird%20Refuge.pdf>. Accessed November 2021.

Impact BI-3: The proposed project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. (*Less than Significant*)

The city's Urban Forestry Ordinance, public works code section 801, et seq., requires a permit from public works to remove any protected trees.¹¹⁵ Demolition of the existing building and parking lot and construction of the proposed project would require removal and replacement of two of the four existing street trees along the California Street frontage and removal of several small shrubs. In addition, the proposed project would include planting of one additional street tree along California Street, subject to review and approval by San Francisco Public Works, six non-street trees, 650 shrubs, grasses, or ferns; and approximately 80 succulents. The proposed project would not conflict with any local policies or ordinances that protect biological resources. The impact would be less than significant. No mitigation would be required.

Impact C-BI-1: The proposed project, in combination with cumulative projects, would not result in significant cumulative impacts on biological resources. (*Less than Significant*)

As discussed under Impact BI-1, the project site and surrounding area currently do not support any candidate, sensitive, or special-status species, and thus the proposed project would have no effects on such species. Therefore, the proposed project would not contribute to an adverse effect on any species identified as a candidate, sensitive, or special-status species. The proposed project would not conflict with any local policies or ordinances protecting biological resources, and therefore would not contribute to a potential cumulative impact.

Cumulative development projects identified in Section 0, Project Setting also would be subject to the requirements of the Migratory Bird Treaty Act, California Fish and Game Code, and the City's bird-safe building standards and Urban Forestry Ordinance. Therefore, the proposed project would not combine with cumulative development projects to result in a cumulative impact related to biological resources. The cumulative impact would be less than significant. No mitigation would be required.

¹¹⁵ San Francisco Public Works Code, 1995, Article 16: Urban Forestry Ordinance, available at: https://sfenvironment.org/sites/default/files/agenda/attach/public_works_code_groves_explanatory_documents_consolidated.pdf. Accessed November 2021.

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact	Not Applicable
15. GEOLOGY AND SOILS. Would the project:					
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:					
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐	☐
ii) Strong seismic ground shaking?	☐	☐	☒	☐	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐	☐
iv) Landslides?	☐	☐	☒	☐	☐
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐	☐
c) Be located on geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or offsite landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	☐	☒	☐	☐
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐	☐
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	☐	☒
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐	☐

The proposed project would connect to San Francisco's sewer and stormwater collection and treatment system and would not use a septic water disposal system. Therefore, Topic E.15(e) is not applicable to the proposed project.

This section describes the geology, soils, and seismicity characteristics of the project area as related to the proposed project and relies on the information and findings provided in a geotechnical investigation that was conducted for the project site and proposed project.¹¹⁶ The geotechnical investigation included four cone penetration tests and the drilling of one test boring on the project site to depths of approximately 37 and 50 feet below ground surface (bgs). The project site is underlain by approximately 25 to 32 feet of loose

116 Rockridge Geotechnical, 2021 (February 15), Final Geotechnical Investigation, Proposed Teaching and Learning Facilities Building, 3150 California Street, San Francisco, California.

to dense sand and silty sand. On the northern portion of the project site, the sand and silty sand consist of undocumented fill to a depth of 25 feet. On the southern portion of the project site, the fill extends to a depth of approximately 6 feet and is underlain by native dune sand to a depth of approximately 32 feet. The fill and dune sand are underlain by very stiff to hard sandy clay that extends to bedrock at depths ranging from 35 to 41 feet below ground surface.

Groundwater was encountered in the boring at a depth of about 25 feet bgs. Based on the topography of the area surrounding the site and the subsurface conditions, seasonal perched water is assumed at the project site. Project construction would require excavation to a depth of approximately 10 to 26 feet, with the depth of excavation depending on the elevation of the ground surface, which varies across the project site. The new building would rest on a mat foundation.

Impact GE-1: The proposed project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving fault rupture, strong seismic ground shaking, seismically induced ground failure, including liquefaction or landslides. (*Less than Significant*)

Fault Rupture

The project site is not within an Alquist-Priolo Earthquake Fault Zone, and no known active faults run underneath the project site or in the project vicinity. The major active faults in the area are the San Andreas, Hayward, and San Gregorio faults, the closest of which is the San Andreas Fault, which is approximately 11 miles southwest of the project site.¹¹⁷ The proposed project would not result in substantial adverse effects involving rupture of a known earthquake fault. The impact would be less than significant. No mitigation would be required.

Strong Seismic Ground Shaking

The San Francisco Bay Area is a seismically active region. According to the U.S. Geological Survey, the overall probability of a magnitude 6.7 or greater earthquake to occur in the San Francisco Bay Area during the next 30 years is 72 percent.¹¹⁸ Therefore, periodic minor earthquakes and a strong to very strong earthquake would be likely to affect the proposed project during its lifetime.

To ensure that the potential for adverse effects related to geology and soils are adequately addressed, San Francisco relies on the state and local regulatory process for review and approval of building permits, pursuant to the California Building Code and the San Francisco Building Code, which is the state building code plus local amendments that supplement the state code, including the building department's administrative bulletins. The proposed project would be required to follow the building department's local implementing procedures, including administrative bulletins, which are part of the local building code, and information sheets, which clarify building department requirements and procedures. On November 21, 2018, the building department issued Administrative Bulletin AB-082, Guidelines and Procedures for Structural, Geotechnical, and Seismic Hazard Engineering Design Review.¹¹⁹ The guidelines describe the review process

117 Rockridge Geotechnical, 2021 (February 15), Final Geotechnical Investigation, Proposed Teaching and Learning Facilities Building, 3150 California Street, San Francisco, California.

118 U.S. Geological Survey, 2015 (March), Uniform California Earthquake Rupture Forecast (UCERF3), Fact Sheet 2015-3009, UCERF3: A New Earthquake Forecast for California's Complex Fault System.

119 San Francisco Department of Building Inspection, 2018 (November 21), Administrative Bulletin 082, Guidelines and Procedures for Structural Design Review, available at: https://codelibrary.amlegal.com/codes/san_francisco/latest/sf_building/0-0-0-95162, accessed November 12, 2021.

for structural, geotechnical, and seismic hazard engineering design, including the characteristics considered in determining whether review is required and, if so, which reviews are required.

The building department's permit review process would ensure that the proposed project's structural and foundation plans would comply with applicable building code provisions and conform to the measures recommended in the project-specific geotechnical report, and the recommendations made by the engineering design review team, as required by AB-082. The impact would be less than significant. No mitigation would be required.

Liquefaction, Lateral Spreading, and Landslides

Liquefaction and lateral spreading of soils can occur when ground shaking causes saturated soils to lose strength because of an increase in pore pressure. The project site is not in a mapped liquefaction hazard zone.^{120,121} The depth of the native dune sand is variable across the project site and underlies the site between depths of 6 and 32 feet and depths of 20 to 26 feet across the project site. Although dune sand is susceptible to liquefaction, the proposed finished floor elevation for the basement would be 6 to 18 feet above the dune sand. Thus, the potential for bearing capacity failure of the proposed foundation, surface manifestation of liquefaction, and lateral spreading at the project site would be low.¹²² Therefore, the proposed project would not result in substantial adverse effects related to liquefaction and lateral spreading. The impact would be less than significant. No mitigation would be required.

The project site is relatively level and not within a mapped landslide hazard zone.¹²³ Therefore, the proposed project would not result in substantial adverse effects related to landslides. The impact would be less than significant. No mitigation would be required.

Impact GE-2: The proposed project would not result in substantial erosion or loss of topsoil. (*Less than Significant*)

The project site is fully developed and entirely occupied by the existing building and surface pavements. For this reason, the proposed project would not result in the loss of topsoil. The proposed project would require excavation of approximately 14,000 cubic yards of soil to a depth of approximately 26 feet, which could create the potential for windborne and waterborne soil erosion. Construction activities would be required to comply with the Construction Site Runoff Ordinance (ordinance no. 260-13), which requires all construction sites, regardless of size, to implement best management practices to prevent construction site runoff discharges into the City's combined stormwater/sewer system. Furthermore, because the proposed project would disturb more than 5,000 square feet of ground surface, compliance with public works code article 4.2, section 146 et seq. (Construction Site Runoff Control) would be required. A construction site runoff control permit would be obtained before any land-disturbing activities and would include an erosion and sediment control plan. Compliance with these requirements would ensure that the proposed project would not result in erosion. The impact would be less than significant. No mitigation would be required.

120 San Francisco Planning Department, 2019, San Francisco Property Information Map, Map Viewer.

121 Rockridge Geotechnical, 2021 (February 15), Final Geotechnical Investigation, Proposed Teaching and Learning Facilities Building, 3150 California Street, San Francisco, California.

122 Ibid.

123 Ibid.

Impact GE-3: The proposed project would not result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse by being located on a geologic unit or soil that is unstable, or that could become unstable. (*Less than Significant*)

As discussed under Impact GE-1, the potential for landslide or liquefaction at the project site would be low. In addition, the proposed project would be required to comply with the provisions of the California Building Code and the San Francisco Building Code that address issues related to seismic safety and unstable soil. The geotechnical report that was prepared for the proposed project includes recommendations related to the following aspects of construction: site preparation, excavation and fill placement; exterior flatwork subgrade preparation; utility trench backfill; mat foundation; vapor retarder; permanent below-grade walls; excavation shoring; soldier pile and lagging shoring system; underpinning; and seismic design.¹²⁴ Implementation of these recommendations would ensure that the proposed project would not cause the soil underlying the project site to become unstable and result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse. The impact would be less than significant. No mitigation would be required.

Impact GE-4: The proposed project would not create substantial risks to life or property from being located on expansive soils. (*Less than Significant*)

Expansive soils are characterized by their ability to undergo significant volume change (i.e., to shrink and swell) because of variations in moisture content. Expansive soils typically are very fine-grained and have a high to very high percentage of clay. The project site is underlain by approximately 25 to 32 feet of loose to dense sand and silty sand. On the northern portion of the project site, the sand and silty sand consist of undocumented fill to a depth of 25 feet. On the southern portion of the project site, the fill extends to a depth of approximately 6 feet and is underlain by native dune sand to a depth of approximately 32 feet. The fill and dune sand are underlain by very stiff to hard sandy clay that extends to bedrock at depths ranging from 35 to 41 feet below ground surface.¹²⁵ Because of the limited clay content of the underlying substrate, the proposed project is not expected to be at substantial risk from expansive soils. Furthermore, Section 1803 of the California Building Code states that in areas likely to have expansive soil, the building official shall require soil tests to determine where such soils do exist, and if so, the geotechnical report must include recommendations and special design and construction provisions for foundations of structures on expansive soils, as necessary. Compliance with building code requirements would ensure that potential impacts related to expansive soils would be less than significant. No mitigation would be required.

Impact GE-5: The proposed project would directly or indirectly destroy a unique paleontological resource or site or unique geologic feature. (*Less than Significant with Mitigation Incorporated*)

Paleontological resources include fossilized remains or traces of animals, plants, and invertebrates from a previous geological period. Paleontological resources are deposited and preserved within particular

¹²⁴ Rockridge Geotechnical, 2021 (February 15), Final Geotechnical Investigation, Proposed Teaching and Learning Facilities Building, 3150 California Street, San Francisco, California.

¹²⁵ Ibid.

lithologic (rock) units. Lithologic units that may contain fossils include sedimentary and volcanic formations. Collecting localities and the geologic formations containing those localities also are considered paleontological resources because they represent a limited, nonrenewable resource that, once destroyed, cannot be replaced. Rock units from which vertebrate or significant invertebrate, plant, or trace fossils have been recovered have high potential to contain additional significant paleontological resources.¹²⁶ The potential to affect fossils varies with the depth and type of disturbance, geologic units on the project site, construction activities, and previous disturbance.

Subsurface construction for the proposed project would include excavations ranging from 10 to 26 feet deep. The project site is mapped as quaternary beach and dune sand and as previously described, is underlain by sand and silty sand, consisting of fill and native dune sand, to depths of approximately 32 feet. Fill has no paleontological sensitivity and is not expected to contain subsurface paleontological resources. The native dune sand is of unknown age and potentially would be sensitive for paleontological resources. Excavation of the project site potentially could uncover paleontological resources. Implementation of Mitigation Measures M-GE-5a: Worker Environmental Awareness Training, and M-GE-5b: Discovery of Unanticipated Paleontological Resources, would address impacts related to paleontological resources.

Mitigation Measure M-GE-5a: Worker Environmental Awareness Training

Prior to commencing construction, the project sponsor shall ensure that all workers are trained on the contents of the Paleontological Resources Alert Sheet, as provided by the planning department. The Paleontological Resources Alert Sheet shall be prominently displayed at the construction site during ground disturbing activities to provide pre-construction worker environmental awareness training regarding potential paleontological resources.

In addition, the project sponsor (through a designated representative) shall inform construction personnel of the immediate stop work procedures and contact information to be followed if bones or other potential fossils are unearthed at the project site, and the laws and regulations protecting paleontological resources. As new workers arrive at the project site for ground disturbing activities, they would be trained by the construction supervisor.

The project sponsor shall submit a letter confirming the timing of the worker training to the planning department. The letter shall confirm the project's location, the date of training, the location of the informational handout display, and the number of participants. The letter shall be transmitted to the planning department within five (5) business days of conducting the training.

Mitigation Measure M-GE-5b: Discovery of Unanticipated Paleontological Resources

In the event of the discovery of an unanticipated paleontological resource during construction, excavations within 25 feet of the find shall temporarily be halted until the discovery is examined by a qualified paleontologist (pursuant to Society of Vertebrate Paleontology standards (SVP 1995, 1996)). Work within the sensitive area shall resume only when deemed appropriate by the qualified paleontologist in consultation with the planning department.

¹²⁶ Society of Vertebrate Paleontology, 2010, Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources.

The qualified paleontologist shall determine if: (1) the discovery is scientifically significant; (2) the necessity for involving other agencies and stakeholders; (3) the significance of the resource; and (4) methods for resource recovery. If a paleontological resource assessment results in a determination that the resource is not scientifically important, this conclusion shall be documented in a paleontological evaluation letter to demonstrate compliance with applicable statutory requirements. The paleontological evaluation letter shall be submitted to the planning department for review within 30 business days of the discovery.

If a paleontological resource is determined to be of scientific importance and there are no feasible avoidance measures, a paleontological mitigation program (mitigation program) must be prepared by the qualified paleontologist engaged by the project sponsor. The mitigation program shall include measures to fully document and recover the resource. The mitigation program shall be approved by the planning department. Ground-disturbing activities in the project area shall be monitored as determined by the qualified paleontologist for the duration of such activities in collaboration with the planning department once work is resumed.

The mitigation program shall include: (1) procedures for construction monitoring at the project site; (2) fossil preparation and identification procedures; (3) curation into an appropriate repository; and (4) preparation of a paleontological resources report (report or paleontology report) at the conclusion of ground-disturbing activities. The paleontology report shall include dates of fieldwork, results of monitoring, fossil identifications to the lowest possible taxonomic level, analysis of the fossil collection, a discussion of the scientific significance of the fossil collection, conclusions, locality forms, an itemized list of specimens, and a repository receipt from the curation facility. The project sponsor shall be responsible for the preparation and implementation of the mitigation program, in addition to any costs necessary to prepare and identify collected fossils and for any curation fees charged by the paleontological repository.

The mitigation program shall be submitted to the planning department for review within 10 business days of the discovery. The paleontology report shall be submitted to the planning department for review within 30 business days from conclusion of ground-disturbing activities or as negotiated following consultation with the planning department.

With implementation of these mitigation measures, the impact on paleontological resources would be reduced to less-than-significant with mitigation incorporated.

A unique geologic or physical feature embodies distinctive characteristics of any regional or local geologic principles, provides a key piece of information important to geologic history, contains minerals not known to occur elsewhere in the county, and/or is used as a teaching tool. The project site is entirely paved and currently is developed with an existing building and parking lot. No unique geologic features exist at the project site. Therefore, no impact on unique geologic features would occur.

Impact C-GE-1: The proposed project, in combination with cumulative projects, would not result in significant cumulative impacts on geology and soils. (*Less than Significant*)

The geographic scope for potential geology and soils impacts generally are local and site specific, encompassing the project site and immediate vicinity. Of the cumulative projects listed in Section 0, Project Setting, only the 3333 California Street project would be constructed in the immediate vicinity of the project

site (approximately 200 feet southwest). To have a cumulative impact, adverse geologic conditions would have to occur at the same time and in the same location as the proposed project.

Nearby cumulative development projects would be subject to the same seismic safety standards and design review procedures as those applicable to the proposed project. Compliance with the seismic safety standards and the design review procedures would ensure that the effects from nearby cumulative development projects would be unlikely to occur. For these reasons, the proposed project would not combine with past, present, and reasonably foreseeable future projects in the project vicinity to create a significant cumulative impact related to geology and soils. The cumulative impact would be less than significant. No mitigation would be required.

The 3333 California Street project would involve ground disturbance during construction and, to the extent this disturbance would extend into geological units that could be fossil-bearing, also could have the potential to uncover and disturb previously unidentified unique paleontological resources, if present. As discussed under Impact GE-5, the proposed project would have a less-than-significant impact on paleontological resources with mitigation incorporated. Furthermore, because impacts on paleontological resources are site-specific and generally limited to the immediate fossil location, the proposed project, in combination with other cumulative projects, would not result in a significant cumulative impact on paleontological resources. The cumulative impact would be less than significant. No mitigation would be required.

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact	Not Applicable
16. HYDROLOGY AND WATER QUALITY. Would the project:					
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	☐	☐	☒	☐	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐	☐
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner that would:					
i) Result in substantial erosion or siltation on- or offsite;	☐	☐	☒	☐	☐
ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or offsite;	☐	☐	☒	☐	☐
iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☒	☐	☐
iv) Impede or redirect flood flows?	☐	☐	☒	☐	☐
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☐	☒
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐	☐

The project site is well inland and up-gradient from both the San Francisco Bay and the Pacific Ocean. It would not be subject to seiche or potential inundation in the event of a tsunami occurring along the San Francisco coast (see Maps 5 and 6 of the San Francisco General Plan Community Safety Element). The Storm Flood Risk Map indicates that the site is not within a Special Flood Hazard Area,¹²⁷ an area subject to a 100-year flood event. Therefore, topic E.16(d) would not be applicable.

127 San Francisco Public Utilities Commission, 2019 (July), 100-Year Storm Flood Risk Map, available at: <https://sfplanninggis.org/floodmap/>, accessed November 16, 2021.

Impact HY-1: The proposed project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality. (*Less than Significant*)

Project-related wastewater and stormwater would flow into the City's combined stormwater/sewer system and would be treated according to the standards contained in the City's National Pollutant Discharge Elimination System (NPDES) Permit for the Southeast Water Pollution Control Plant before discharge into San Francisco Bay. The NPDES standards are set and regulated by the San Francisco Bay Area Regional Water Quality Control Board.

Construction activities such as excavation, earthmoving, and grading would expose soil and could result in erosion and excess sediments being carried in stormwater runoff to the combined stormwater/sewer system. In addition, stormwater runoff from temporary on-site use and storage of vehicles, fuels, wastes, and other hazardous materials could carry pollutants to the combined stormwater/sewer system if proper handling methods are not employed. Runoff from the project site would be properly treated at the Southeast Water Pollution Control Plant before being discharged into San Francisco Bay. In addition, because the proposed project would disturb more than 5,000 square feet of ground surface, it would be required to comply with article 4.2 of the San Francisco Public Works Code, section 146 (Construction Site Runoff Control). A construction site runoff control permit would be obtained before any land-disturbing activities and would include an erosion and sediment control plan. The proposed project would not violate surface water quality standards or waste discharge requirements during construction. Groundwater is present at approximately 25 feet below ground surface, at the shallowest point. Project excavation would range from 10 to 26 feet below ground surface and could encounter groundwater. Dewatering may be required during project construction, and any encountered groundwater would be discharged into the combined stormwater/sewer system and be subject to the requirements of the San Francisco Sewer Use Ordinance (ordinance no. 19-92, amended by ordinance no. 116-97), as supplemented by San Francisco Public Works order no. 158170. These regulations would require a permit from the Wastewater Enterprise Collection System Division of the SFPUC. A permit may be issued only if an effective pretreatment system is maintained and operated. Each permit for such discharge would contain specific water quality standards and may require the project sponsor to install and maintain meters to measure the volume of the discharge to the combined sewer system. The proposed project would comply with these regulations and would not degrade water quality.

During operation, wastewater and stormwater from the project site would continue to flow into the combined stormwater and sewer system and be treated to the standards contained in the City's NPDES permit for the Southeast Water Pollution Control Plant, before discharge into San Francisco Bay. Furthermore, the proposed project would be required to comply with article 4.2 of the San Francisco Public Works Code, section 147 (stormwater management). The SFPUC has developed the San Francisco 2016 Stormwater Management Requirements and Design Guidelines¹²⁸, in accordance with the requirements of this ordinance. The intent of the City's stormwater management program is to reduce the volume of stormwater entering the City's combined and separate sewer systems, and to protect and enhance the water quality of receiving waters, pursuant to and consistent with federal and state laws, lawful standards, and orders applicable to stormwater and urban runoff control and the City's authority to manage and operate its drainage systems. Required compliance with all applicable federal and state laws, lawful standards, and

128 San Francisco Public Utilities Commission, 2016 (May), San Francisco Stormwater Management Requirements and Design Guidelines, Urban Watershed Management Program, available at <https://sfport.com/node/5558>.

orders would ensure that project operation would not violate water quality standards or waste discharge requirements.

For these reasons, the proposed project would not violate any water quality standards or waste discharge requirements, or otherwise substantially degrade surface or groundwater quality. The impact would be less than significant. No mitigation would be required.

Impact HY-2: The proposed project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the proposed project may impede sustainable groundwater management of the basin. (*Less than Significant*)

All groundwater resources are managed by the SFPUC's groundwater management program, ensuring that local groundwater resources designated for current or future beneficial uses are properly protected to prevent overdraft, pollution, or contamination.

As discussed under Impact HY-1, groundwater at the project site occurs at a depth of approximately 25 feet, and project-related excavations may encounter these areas of groundwater. If groundwater is encountered during project construction, dewatering would be required. Dewatering would be conducted on a short-term and temporary basis during excavation and below-ground activities, and this would not result in a loss of water that would substantially deplete groundwater supplies. No other construction activities would affect groundwater supplies. The proposed project would not require long-term dewatering and would not extract any underlying groundwater supplies during operation. For these reasons, the proposed project would not deplete groundwater supplies. The impact would be less than significant. No mitigation would be required.

The project site is entirely covered with impervious surfaces that greatly limit surface water infiltration to the groundwater under existing conditions. The proposed project would not result in an increase in impervious surface and would not result in any change in groundwater infiltration or runoff at the project site. The proposed project would not interfere substantially with groundwater recharge. The impact would be less than significant. No mitigation would be required.

Impact HY-3: The proposed project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner that would result in substantial erosion, siltation, or flooding on or off site; that would create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or that would impede or redirect flood flows. (*Less than Significant*)

The project site currently is covered with impervious surfaces and does not contain any streams or water courses. Therefore, the proposed project would have no impact with respect to altering the course of a stream or river or substantially altering the existing drainage pattern of the project site or area.

During construction, erosion and transportation of soil particles potentially could occur at the project site. As described under Impact HY-1, the proposed project would be subject to, and required to comply with article 4.2 of the San Francisco Public Works Code, section 146 (Construction Site Runoff Control), which would require a construction site runoff control permit and erosion and sediment control plan to limit the amount of runoff from the project site.

The project site is covered entirely with developed (e.g., impervious) surfaces and structures. The proposed project would involve new development across the entire project site and would not result in a change to the impervious surface coverage at the project site. As discussed under Impact HY-1, the proposed project would be required to comply with the 2016 Stormwater Management Requirements and Design Guidelines and the Stormwater Management Ordinance. Therefore, because the proposed project would not increase impervious surfaces at the project site and would be required to comply with existing regulations that address stormwater runoff, the proposed project would not result in altered drainage patterns that would cause substantial erosion or flooding, or contribute runoff exceeding the capacity of existing or planned stormwater drainage systems. The impact would be less than significant. No mitigation would be required.

Impact HY-4: The proposed project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. (*Less than Significant*)

As discussed under Impact HY-1, project-related wastewater and stormwater would flow into the combined stormwater/sewer system, would be treated according to the standards contained in the City's NPDES permit for the Southeast Water Pollution Control Plant, and would comply with the SFPUC's stormwater management requirements before discharge into San Francisco Bay. Standard best management practices would be implemented to control construction site runoff and reduce the discharge of pollutants to storm drain systems from stormwater and other nonpoint-source runoff. As part of compliance with permit requirements during ground-disturbing or other project construction activities, implementation of water quality control measures and best management practices would ensure that water quality standards would be met, including the water quality objectives that protect designated beneficial uses of surface and groundwater, as defined in the basin plan.

Groundwater encountered during project construction or operation would be required to meet certain water quality standards before being discharged into the combined stormwater/sewer system. As discussed under Impact HY-2, the proposed project would not permanently or substantially deplete groundwater resources and would comply with the SFPUC's groundwater management program. For these reasons, the proposed project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. The impact would be less than significant. No mitigation would be required.

Impact C-HY-1: The proposed project, in combination with cumulative projects, would not result in a significant cumulative impact on hydrology and water quality. (*Less than Significant*)

The geographic scope for potential cumulative impacts on hydrology and water quality would encompass the project area and water bodies that could be affected by other projects' activities in the project area.

Similar to the proposed project, all of the cumulative projects listed in Section 0, Project Setting would result in an intensification of land uses in the project vicinity. This cumulative development would result in an increase in water consumption, stormwater discharge, and wastewater generation. The SFPUC has accounted for such growth in its service projections. However, other development projects would be subject to the same water conservation, stormwater management, and wastewater discharge ordinances that would be applicable to the proposed project. Therefore, the proposed project in combination with past, present, and reasonably foreseeable future projects, would not result in a significant cumulative impact related to hydrology and water quality. The cumulative impact would be less than significant. No mitigation would be required.

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact	Not Applicable
17. HAZARDS AND HAZARDOUS MATERIALS. Would the project:					
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐	☐
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☒	☐	☐
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☐	☐	☒
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐	☐
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	☐	☐	☒	☐	☐

The project site is not within an area covered by an airport land use plan or within 2 miles of a public airport or a public use airport. Therefore, E.17(e) would not apply to the proposed project.

Impact HZ-1: The proposed project would not create a significant hazard through the routine transport, use, or disposal of hazardous materials. (*Less than Significant*)

Project construction would require the routine use of hazardous materials, such as fuels, lubricants, paints, and solvents for motorized heavy equipment (e.g., excavators, bulldozers, backhoes). During construction, minor maintenance activities and refueling of equipment and vehicles (from mobile or stationary fuel supply sources) could occur at the project site. If not managed responsibly, the routine transport, use, and disposal of hazardous materials could pose a risk to human health or the environment. For example, hazardous materials would have the potential to be spilled accidentally during maintenance, refueling, or servicing of

equipment and vehicles. Improperly disposed, spilled, or leaking hazardous materials could create a significant hazard to workers, the public, or the environment.

Hazardous materials handling, disposal, and transportation must occur in accordance with applicable federal, state, and local regulations. Handling of hazardous materials would need to be conducted in accordance with title 29, section 1910 of the Code of Federal Regulations. Transportation of hazardous materials would need to comply with the Resource Conservation and Recovery Act and U.S. Department of Transportation regulations. The Resource Conservation and Recovery Act also governs hazardous material disposal, ensuring that only facilities permitted to accept a specific waste are used.

In addition to federal regulations, workers handling hazardous materials would be required to adhere to California Occupational Safety and Health Administration health and safety requirements, which would include availability of safety equipment and preparation and implementation of emergency evacuation plans, health and safety plans, safety training, accident and illness prevention programs, hazardous substance exposure warnings, and emergency action and fire prevention plans. Title 8 of the California Code of Regulations would require employee training, availability of safety equipment, accident prevention programs, and hazardous substance exposure warnings.

Title 8 also includes hazard communication program regulations that contain worker safety training and hazard information requirements, procedures for identifying and labeling hazardous substances, communicating hazard information related to hazardous substances and their handling, and preparing health and safety plans to protect workers. The construction contractor would be required to comply with mandatory regulatory requirements, which would minimize potential impacts related to routine transport, use, or disposal of hazardous materials and reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

Project operations would require the routine, handling, use and disposal of small quantities of commercially available materials, such as household cleaning and landscaping supplies, similar to the current commercial and retail uses in operation of the existing building. These materials would not be used in quantities that could create a significant hazard to public health or the environment. The proposed building would have standard science classrooms and laboratories that may use hazardous materials for educational purposes. The new laboratories would need to comply with title 5, section 14030 of the California Code of Regulations, which describes laboratory design and safety requirements for schools. The requirements include proper hazardous materials management and storage, necessary safety equipment (e.g., fire extinguisher, first-aid kit), and equipment in case of accidental release of a toxic material (e.g., exhaust fume hood, deluge shower, eye washes). The operation of laboratories at the school would not create a significant hazard to the public or the environment. The impact would be less than significant. No mitigation would be required.

Impact HZ-2: The proposed project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. (*Less than Significant*)

The project site is not within a Maher zone but is immediately adjacent to a Maher zone mapped location at 3225 Sacramento Street, which abuts the northeastern side of the project site. Although the proposed project is not subject to the Maher ordinance, the project sponsor has voluntarily enrolled the proposed project in the Maher program.

The goal of the Maher Ordinance is to protect public health and safety by requiring appropriate handling, treatment, disposal and when necessary, remediation of contaminated soil or groundwater that is

encountered in the building construction process. Projects that disturb 50 cubic yards or more of soil that are on sites with potentially hazardous soil or groundwater are subject to this ordinance. The proposed project would require disturbance of approximately 14,000 cubic yards of soil and is voluntarily enrolled in the Maher program.

The Maher Ordinance requires the project sponsor to retain the services of a qualified professional to prepare an *environmental site assessment* meeting the requirements of section 22.A.6 of the San Francisco Health Code. The site assessment determines the potential for site contamination and the level of exposure risk from a project.

The Maher application and Phase I environmental site assessment for the proposed project were submitted to the health department on November 12, 2021.¹²⁹ The Phase I environmental site assessment included: (1) a reconnaissance-level site visit to look for evidence of past or current use that may involve release of hazardous materials or petroleum products; (2) review of information provided by the property owners; (3) an environmental database records review; (4) review of local, state, and federal records pertinent to a Phase I environmental site assessment; (5) review of relevant documents and maps regarding local geologic and hydrogeologic conditions; and (6) review of historical documents, including aerial photographs, Sanborn maps, and topographical maps.

The Phase I environmental site assessment found no historic or active hazardous waste sites within the project site. Several historical hazardous waste sites are in the project vicinity, including a gasoline service station approximately 200 feet to the southwest and a mechanic shop approximately 200 feet to the north, but no active hazardous waste sites are in the immediate project vicinity. Three laundromats and dry-cleaning facilities were identified within 0.1 mile of the project site, but no violation or release of chemicals has been reported. No areas of hazardous materials or sites that could generate or use hazardous substances above normal use were identified in the project site or neighboring properties. The Phase I environmental site assessment concluded that minimal risk of contamination to the soil and groundwater exists from current or historical property uses of the project site, and no additional investigation was recommended. The San Francisco Department of Public Health reviewed the project's Maher application and Phase I environmental site assessment and concluded that due to potential subsurface contamination from historical on-site and offsite uses, further investigation is required. The health department has requested that the project sponsor prepare and submit a Phase II work plan for review.¹³⁰ Prior to the issuance of any building permits for the proposed project, the project sponsor would be required to remediate potential soil and/or groundwater contamination in accordance with the Phase II work plan and the Maher Ordinance. Compliance with these requirements would ensure that the proposed project would not result in any significant impacts related to contaminated soil and/or groundwater.

The existing building at the project site was constructed in the 1980s, after the ban on the use of asbestos-containing materials and lead-based paint were implemented in the 1970s. Therefore, the Phase I environmental site assessment concluded that asbestos and lead-based paint are unlikely to be present in the interior and exterior of the building, although no sampling was performed during the assessment and additional investigation was not recommended. Although asbestos-containing materials and lead-based paint are unlikely to be part of the building, its demolition could release these materials into the

129 SOMA Environmental Engineering, Inc., 2019 (October 28), Phase I Environmental Site Assessment, 3150 California Street, San Francisco, California.

130 San Francisco Department of Public Health, SFHC Article 22A – Phase 2 Work Plan Request, 3150 California Street, San Francisco, CA 94115, EHB-SAM Case Number: 2082, June 29, 2022.

environment. The demolition work would need to be performed in compliance with federal, state, and local regulations related to the abatement of hazardous materials. These regulations would include the air district's Regulation 11, Rule 2: Hazardous Pollutants – Asbestos Demolition, Renovation, and Manufacturing; title 8, section 1529 (asbestos) of the California Code of Regulations; and title 8, section 1532.1 (lead) of the California Code of Regulations. Compliance with these regulations would ensure that demolition of the existing building would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

As stated under Impact HZ-1, project operations would include use of small quantities of commercially available materials, such as household cleaning and landscape supplies for building and landscaping maintenance, similar to the current retail and commercial uses at the project site. However, the use of these materials would be limited and not in quantities that would cause the release of hazardous materials into the environment.

Use of the proposed building's laboratories may include use of hazardous materials for classroom experiments, but these materials would not be used in quantities that would create a significant hazard to the public or the environment. The laboratories also would be equipped with appropriate safety equipment in case of accidental release and would be required to comply with title 5, section 14030 of the California Code of Regulations. The impact would be less than significant. No mitigation would be required.

Impact HZ-3: The proposed project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. (*Less than Significant*)

The proposed project would add a fifth campus building to the SFUHS. The Drew School and the South, Lower, and Middle Buildings of the SFUHS campus are within 0.25 miles of the project site. The potential presence of asbestos and lead in the existing building, proposed for demolition, and in the underlying soils at the project site could represent a hazard to school children if hazardous materials that may be present are released and not handled or disposed properly. As discussed under Impact HZ-2, minimal risk exists of contamination to the soil and groundwater from current or historical property uses at the project site, and the proposed project's demolition work would be performed in compliance with federal, state, and local regulations related to the abatement of hazardous materials. Therefore, project construction would not emit hazardous emissions that could present a hazard to nearby schools.

As discussed under Impact HZ-1, the proposed project would include the use of common household supplies for facilities maintenance that would not create a significant hazard to the public or the environment. The proposed facilities would include standard science classrooms and laboratories that may use hazardous materials for educational purposes. As discussed under Impact HZ-2, use of these materials would be limited to small quantities, and the laboratories would function in compliance with title 5, section 14030 of the California Code of Regulations, which details laboratory design and safety requirements for schools, including the storage of hazardous materials. The proposed building's laboratories and facilities maintenance would not create a significant hazard to the public or other schools within 0.25 miles of the project site. The impact would be less than significant. No mitigation would be required.

Impact HZ-4: The proposed project would not be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code section 65962.5 and, as a result, would not create a significant hazard to the public or the environment. (*Less than Significant*)

The project site is not listed on any hazardous materials sites compiled pursuant to Government Code section 65962.5.¹³¹ In addition, as discussed under Impact HZ-2, the project site is not in an area that is subject to San Francisco health code article 22A (Maher Ordinance), indicating that the project site is not known or suspected to contain contaminated soil and/or groundwater.¹³² A search of the California Department of Toxic Substances Control's EnviroStor database and the state water board's GeoTracker database found that no open hazardous materials sites are at the project site or in the project vicinity.^{133,134}

Sixteen closed, leaking underground storage tanks are within 1,000 feet of the project site. As discussed under Impact HZ-2, a Phase I environmental site assessment was prepared for the proposed project and determined that minimal risk of contamination to the soil and groundwater exists from current or historical property uses at the project site, and no additional investigation was recommended. Furthermore, as discussed under Impact HZ-2, compliance with local, state, and federal requirements would minimize the risk of hazards to the public or environment. The impact would be less than significant. No mitigation would be required.

Impact HZ-5: The proposed project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. (*Less than Significant*)

The proposed project is not anticipated to interfere with the San Francisco emergency response plan.¹³⁵ Project construction may require temporary lane closure, to accommodate some project construction activities, including delivery of construction equipment and excavation activities. If required, the right westbound travel lane of California Street would be closed, and the left westbound lane would remain open for vehicle traffic. The lane closure would be temporary and would comply with section 3 (lane closure requirements) of the San Francisco Municipal Transportation Agency Regulations for Working in San Francisco Streets, which specifies the minimum width of traffic lanes for emergency vehicle access.¹³⁶ Project implementation would increase construction vehicle trips during construction, but not to the extent that would impede emergency vehicle access. In addition, lane closures and increases in vehicle trips would not impede or hinder the movement of emergency vehicles because California law requires that drivers yield the right-of-way to emergency vehicles and remain stopped until the emergency vehicle passes (California Vehicle Code section 21806).

Project operation would increase vehicle trips to the project site for student pick-ups and drop-offs. Streetscape changes would include installation of a 78-foot passenger loading zone and a 22-foot accessible

131 Ibid.

132 San Francisco Property Information Map, 2021, op. cit.

133 California Department of Toxic Substances Control, 2021, EnviroStor Database, available at: <https://www.envirostor.dtsc.ca.gov/public/>, accessed December 6, 2021.

134 State Water Resources Control Board, 2021, GeoTracker, available at: <https://geotracker.waterboards.ca.gov/map/?CMD=runreport&myaddress=Sacramento>, accessed December 6, 2021.

135 City and County of San Francisco, 2017, Emergency Response Plan, an Element of the CCFS Emergency Management Program.

136 San Francisco Municipal Transportation Agency, 2021 (October), Regulations for Working in San Francisco Streets.

parking zone in the existing street parking zone, to accommodate student pick-ups and drop-offs. The loading and unloading of students would not require lane closures, and emergency vehicle access would be maintained. Furthermore, the proposed project would not introduce any new design features that could impede or hinder the movement of emergency vehicles at the project site or in the project vicinity. The impact would be less than significant. No mitigation would be required.

Impact HZ-6: The proposed project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires. (*Less than Significant*)

The project site is in a densely developed urban environment. It is not adjacent to any wildlands or in an area where residences are intermixed with wildlands. The proposed project would comply with San Francisco Building and Fire codes. The San Francisco Department of Building Inspection and the San Francisco Fire Department would review the project plans for compliance with all regulations related to fire safety. Compliance with the fire safety regulations would ensure that the proposed project would not expose people or structures to a significant risk or loss, injury, or death involving fires. The proposed project would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires. The impact would be less than significant. No mitigation would be required.

Impact C-HZ-1: The proposed project, in combination with cumulative projects, would not result in a significant cumulative impact related to hazards and hazardous materials. (*Less than Significant*)

The effects of hazardous materials releases generally are highly localized and site-specific; therefore, the geographic scope for cumulative impacts related to hazards and hazardous materials would encompass the project site and immediate project vicinity, including the 3333 California Street project. This cumulative project would be subject to the same fire safety, emergency response, and hazardous materials regulations as those applicable to the proposed project. Thus, the proposed project would not combine with reasonably foreseeable projects in the project vicinity to contribute to a significant cumulative impact related to hazards and hazardous materials. The cumulative impact would be less than significant. No mitigation would be required.

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact	Not Applicable
18. ENERGY. Would the project:					
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐	☐
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐	☐

Impact EN-1: The proposed project would not result in wasteful, inefficient, or unnecessary consumption of energy resources during construction or operation. (*Less than Significant*)

Project construction would require the use of fuel- and electric-powered equipment and vehicles. The amount of fuel used for construction workers' commute trips would be limited to the duration of construction. Project construction would not encourage activities that would result in the use of large amounts of fuel, water, or energy, or use them in a wasteful manner. The impact would be less than significant. No mitigation would be required.

The proposed project would be required to comply with title 24 of the California Code of Regulations and the 2019 San Francisco Green Building Ordinance.¹³⁷ The San Francisco Green Building Ordinance, which aims to reduce impacts that buildings have on the environment, was updated in 2016 to incorporate changes to California's Green Building Standards and title 24 of the Energy Efficiency Standards (part 6). New commercial buildings that are 10 stories or less are required to install solar electric, thermal, or green roofs, and to meet San Francisco's green building requirements tied to LEED and GreenPoint building rating systems. Documentation demonstrating compliance with title 24 would be submitted with a building permit application. The title 24 standards and requirements would be enforced by the San Francisco Department of Building Inspection. The proposed project would incorporate solar photovoltaic panels on the new building's roof. The energy generated from the solar photovoltaic panels would provide a sustainable form of power for the building. The proposed project also would meet certification requirements to attain a LEED gold rating, and would minimize the wasteful, inefficient, or unnecessary consumption of energy resources during operation. The impact would be less than significant. No mitigation would be required.

Impact EN-2: The proposed project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. (*Less than Significant*)

State plans for renewable energy and energy efficiency include California's Renewables Portfolio Standard Program (as revised by Senate Bill No. 100¹³⁸) and the California Energy Efficiency Strategic Plan. The

¹³⁷ San Francisco Department of the Environment, 2019, San Francisco Green Building Code.

¹³⁸ California Legislative Information, 2018, SB-100 California Renewables Portfolio Standard Program: emissions of greenhouse gases.

renewables standard program requires utilities to increase their renewable energy generation to 60 percent by 2030, and for all of the state's electricity to come from carbon-free resources by 2045.¹³⁹ The plan, which was developed in 2008, outlines goals to improve the energy efficiency of new construction within all major sectors throughout the state. Local plans include the City of San Francisco's energy efficiency requirements. The proposed project would increase energy efficiency because the new building would adhere to current energy conservation measures, including those detailed in the San Francisco Green Building Code and title 24 of the California Energy Efficiency Standards. Solar photovoltaic panels would be installed on the roof of the new building, generating sustainable energy during operation. Therefore, the proposed project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. The impact would be less than significant. No mitigation would be required.

Impact C-EN-1: The proposed project, in combination with cumulative projects, would not result in significant cumulative impacts related to the wasteful, inefficient, or unnecessary consumption of energy resources or conflict with or obstruct a state or local plan for renewable energy or energy efficiency. (*Less than Significant*)

The geographic scope for potential cumulative impacts on energy resources would consist of the project vicinity as well as the broader region. Although overall energy demand in California is increasing, commensurate with increasing population, the state also is making concerted energy conservation efforts. Although San Francisco makes a substantial demand for energy and fuel, both city and state policies seek to minimize increases in demand through conservation and energy efficiency regulations and policies, so that energy is not used in a wasteful manner. Similar to the proposed project, all of the cumulative projects would be required to comply with all applicable building codes as well as local and state energy efficiency regulations, ordinances, and plans, including California's Renewables Portfolio Standard Program, the California Energy Efficiency Strategic Plan, and City of San Francisco's energy efficiency standards. Therefore, the cumulative impact would be less than significant. No mitigation would be required.

139 California Public Utilities Commission, 2020, Renewables Portfolio Standard (RPS) Program.

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact	Not Applicable
19. MANDATORY FINDINGS OF SIGNIFICANCE. Does the project:					
a) Have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐	☐
b) Have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	☐	☐	☒	☐	☐
c) Have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐	☐

NOTE: Authority cited: Public Resources Code sections 21083 and 21083.05, 21083.09. Reference: Section 65088.4, Gov. Code; Public Resources Code sections 21073, 21074, 21080(c), 21080.1, 21080.3, 21083, 21083.05, 21083.3, 21080.3.1, 21080.3.2, 21082.3, 21084.2, 21084.3, 21093, 21094, 21095, and 21151; *Sundstrom v. County of Mendocino* (1988) 202 Cal.App.3d 296; *Leonoff v. Monterey Board of Supervisors* (1990) 222 Cal.App.3d 1337; *Eureka Citizens for Responsible Govt. v. City of Eureka* (2007) 147 Cal.App.4th 357; *Protect the Historic Amador Waterways v. Amador Water Agency* (2004) 116 Cal.App.4th at 1109; *San Franciscans Upholding the Downtown Plan v. City and County of San Francisco* (2002) 102 Cal.App.4th 656.

The proposed project would not substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or substantially reduce the number or restrict the range of a rare or endangered plant or animal. As discussed in Section E.3, Cultural Resources, project construction may have a substantial adverse effect on archaeological resources. Implementation of Mitigation Measure M-CR-2: Archeological Monitoring, would reduce this impact to a less-than-significant level. As discussed in Section E.4, Tribal Cultural Resources, project construction could cause a substantial adverse change in the significant of a tribal cultural resource. Implementation of Mitigation Measure M-TCR-1: Tribal Cultural Resources Program, would reduce this impact to a less-than-significant level. As discussed in Section E.15, Geology and Soils, project construction could directly or indirectly destroy a unique paleontological resource or site. Implementation of Mitigation Measures M-GE-5a: Worker Environmental Awareness Training, and M-GE-5b: Discovery of Unanticipated Paleontological Resources, would reduce this impact to a less-than-significant level. Therefore, the proposed project would not eliminate important examples of the major periods of California history or prehistory.

The proposed project would not combine with past, present, or reasonably foreseeable future projects to create significant cumulative impacts related to any of the topics discussed in Section E, Evaluation of Environmental Effects. No significant cumulative impacts would occur to which the proposed project would make cumulatively considerable contributions. Cumulative impacts would be less than significant.

As discussed in Section D, Evaluation of Environmental Effects, the proposed project is anticipated to only result in less-than-significant impacts or less than significant impacts with mitigation for the topics included in the Initial Study checklist. Where necessary, mitigation measures have been identified to reduce impacts to less-than-significant levels. Project construction would produce vibrations that could exceed the California Department of Transportation damage thresholds at residential buildings adjacent to the project site, as discussed in Section D.6, Noise. Implementation of Mitigation Measure M-NO-2: Protection of Adjacent Buildings/Structures and Vibration Monitoring during Construction would reduce this impact to a less-than-significant level. Project construction activities would generate air pollutants that would affect nearby sensitive receptors, as discussed in Section D.7, Air Quality. Implementation of Mitigation Measure M-AQ-4: Clean Off-road Construction Equipment would reduce this impact to a less-than-significant level. The proposed project would not have environmental effects that would cause substantial adverse effects on human beings, either directly or indirectly. The impact would be less than significant. No mitigation would be required.

Public Notice and Comment

On January 10, 2022, the planning department mailed a Notification of Project Receiving Environmental Review to owners of properties within 300 feet of the project site, adjacent occupants, and neighborhood groups. Concerns and issues raised by the public in response to the notice were taken into consideration and incorporated in the environmental review as appropriate.

The planning department received comments expressing concerns about:

- noise during project construction, operation, and from use of fans and mechanical equipment
- traffic congestion from vehicles and buses during deliveries, student pick-up/drop-off, assemblies, and sporting events
- pedestrian traffic from students and staff along California Street and Lyon Street
- increase in students and faculty associated with the proposed project
- fugitive dust and vibration impacts from project construction
- proposed uses of the new SFUHS building and potential environmental effects

A description of the proposed uses of the new SFUHS building and the proposed increase in students and faculty is provided in Section A, Project Description. Sections D.1 through D.19 provide an assessment of the potential environmental effects of the proposed project. Impacts related to noise and vibration from project construction, operation, and mechanical equipment are discussed in Section D.6, Noise. Impacts related to fugitive dust during construction are discussed in Section D.7, Air Quality. Impacts related to student loading and unloading, delivery vehicles and pedestrian traffic are discussed in Section D.5, Transportation and Circulation. Additionally, several comments were made regarding the merits of the proposed project, which are not CEQA issues and are not addressed in this Initial Study. However, these comments may be considered by City decision-makers during their deliberations on whether to approve the proposed project.

Determination

On the basis of this Initial Study:

- ☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- ☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- ☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- ☐ I find that the proposed project MAY have a “potentially significant impact” or “potentially significant unless mitigated” impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- ☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, no further environmental documentation is required.



Lisa Gibson
Environmental Review Officer
for
Rich Hillis
Director of Planning

DATE August 24, 2022

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