



SAN FRANCISCO PLANNING DEPARTMENT

MEMO

DATE: August 6, 2013
TO: San Francisco Planning Commission
FROM: Michael Jacinto, Planning Department
RE: Appeal of Preliminary Mitigated Negative Declaration for
302 Silver Avenue, Assessor's Block 5952, Lot 002,
Planning Department Case No. 2011.1323E

HEARING DATE: August 13, 2015

1650 Mission St.
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An appeal has been received concerning a Preliminary Mitigated Negative Declaration for the following project:

Case No. 2011.1323E – 302 Silver Avenue: The proposed project would involve the demolition of the existing Main Building on the Jewish Home of San Francisco (Jewish Home) campus located at the intersection of Silver Avenue and Mission Street in the Excelsior District (APN 5952/002) and construction of two new buildings up to 78 feet tall containing a total of 210 "Residential Care Facility for the Elderly" (assisted living and memory care) units, as well as retail and support spaces. Four other existing buildings on the site would remain. New buildings would front on Mission Street and Avalon Avenue, and a new vehicular entry court would be constructed from a proposed new driveway on Avalon Avenue at London Street (the existing Mission Street vehicle exit would be removed). The project would include implementation of medical care and wellness programs for a range of older adults, including Jewish Home residents, their caregivers, and others in a central location on the Jewish Home campus referred to as "The Square." The Square would occupy 45,100 square feet of space within existing and proposed buildings. On-site parking spaces would increase from the existing 166 to 224, and would be accommodated in an underground parking garage beneath the new buildings and in the existing at-grade, on-campus parking spaces. Vehicle access to the Jewish Home campus would be from both the Avalon Entry Court noted above and the existing Silver Avenue entrance; the existing Mission Street vehicle exit would be removed. The new buildings would provide new pedestrian access to the campus interior from Mission Street. The project site is within the Residential, Two-House Zoning District (RH-2) and a 50-X Height and Bulk District. [JACINTO]

This matter is calendared for public hearing on August 13, 2015. Enclosed are the appeal and comment letters, the staff responses, the Preliminary Mitigated Negative Declaration, and the draft motion.

If you have any questions related to this project's environmental evaluation, please contact me at (415) 575-9033 or michael.jacinto@sfgov.org.

Thank you.

Memo



SAN FRANCISCO PLANNING DEPARTMENT

Appeal of Preliminary Mitigated Negative Declaration Executive Summary

HEARING DATE: August 13, 2015

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Date: August 6, 2015
Case No.: 2011.1323E
Project Title: Jewish Home of San Francisco
302 Silver Avenue
Zoning: Residential – House, Two Family (RH-2)
50-X Height and Bulk District (50-X)
Block/Lot: 5952/002
Project Sponsor: Jewish Home of San Francisco
Jan Reicher, Director of Strategic Planning
415-562-2505 – jreicher@jewishseniorlivinggroup.org
Staff Contact: Michael Jacinto – (415) 575-9033
michael.jacinto@sfgov.org

PROPOSED COMMISSION ACTION:

Consider whether to uphold staff's decision to prepare a Mitigated Negative Declaration (MND) under the California Environmental Quality Act (CEQA), or whether to overturn that decision and require the preparation of an Environmental Impact Report due to specified potentially significant environmental effects of the proposed project.

PROJECT DESCRIPTION:

The proposed project would involve the demolition of the existing Main Building (including West and Infirmary Wings) on the Jewish Home of San Francisco (Jewish Home) campus and construction of two new buildings up to 78 feet tall containing a total of 210 "Residential Care Facility for the Elderly" (assisted living and memory care) units, as well as retail and support spaces. Four other existing buildings on the site would remain. The new buildings would front on Mission Street and Avalon Avenue, and a new vehicular entry court would be constructed from a proposed new driveway on Avalon Avenue at London Street. The project would also include implementation of medical care, wellness and other programs for a range of older adults, including Jewish Home residents, their caregivers, and others in a central location on the Jewish Home campus referred to hereafter as "The Square." The Square would occupy a total of 45,100 square feet of space within existing and proposed buildings. On-site parking spaces would increase from the existing 166 to 224, and would be accommodated in an underground parking garage beneath the new buildings and in the existing at-grade, on-campus parking spaces. Vehicle access to the Jewish Home campus would be from both the Avalon Entry Court noted above and the existing Silver Avenue entrance; the existing Mission Street vehicle exit would be removed. The new buildings would provide new pedestrian access to the campus interior from Mission Street.

The project site is within the Residential–House, Two Family (RH-2) Use District, and is within a 50-X Height and Bulk District. The project would require Planning Commission approval of a Conditional Use authorization; a Planned Unit Development permit; approval of a Special Use District; amendment of the site’s 50-foot height limit to up to 80 feet to accommodate the new buildings; a General Plan bulk amendment and a *General Plan* referral, among other approvals. These would constitute the Planning Department project approval actions under Chapter 31 of the *San Francisco Administrative Code*.

ISSUES:

The Planning Department published a Preliminary Mitigated Negative Declaration (PMND) on May 27, 2015, and received on June 17, 2015, an appeal letter from five individuals (Trevor Hamden, Hon Tran, Richard Cowie, Shannon Noonan, and Grace D’Anca; collectively, “appellants”) dated June 12, 2015, appealing the Planning Department’s determination to issue a Preliminary Mitigated Negative Declaration (PMND) (“Appeal Letter”) attached as Exhibit B.

The appeal letter states that the PMND fails to adequately address the following issues:

1. Traffic-generated air emissions and traffic and operational noise
2. Water quality impacts associated with impervious surfaces
3. Impacts related to loss of natural light, shading, and increased artificial light
4. Building height increase and impact on neighborhood character
5. Demands for public utilities and infrastructure
6. Impacts of The Square and project operations or employment on neighborhood traffic and parking
7. Pedestrian safety due to increased traffic at the Avalon/London intersection
8. Construction noise
9. Community benefits

Other comments on the PMND were submitted by Aaron Goodman in an email correspondence on June 1, 2015, and supplemented on June 3 and 17, 2015. Mr. Goodman did not state he was appealing the PMND, is not listed as a party to the PMND appeal, and did not pay an appeal fee; therefore Mr. Goodman’s comments are not an appeal, but responses to his comments, as summarized in Exhibit C below, are presented for informational purposes. His comments include the following:

1. Existing and proposed project site landscape maintenance and litter removal
2. Suggested on-site landscape improvements and off-site streetscape improvements, including street trees, paving, and drainage
3. Increased parking demand and provision of adequate parking spaces and transit expansion

4. Suggested community amenities, community art work, and specific restaurant and/or retail uses that could be included in the project
5. Suggested lighting and security cameras
6. Suggested traffic and roadway improvements, including restriction of large truck parking along Silver Avenue and Lisbon Street, installation of speed bumps to prevent speeding on Lisbon Street, new crosswalk markings at the Silver Avenue/Lisbon Street intersection, and improved drainage at the Peru Avenue and Lisbon Street intersection.

All of the CEQA issues raised in the Appeal Letter and other comments have been addressed in the attached materials, which include:

1. A draft Motion upholding the decision to issue an MND;
2. Exhibit A: Planning Department Response to the Appeal Letter;
3. Exhibit B: Appeal Letter from Trevor Hamden, Hon Tran, Richard Cowie, Shannon Noonan, and Grace D'Anca; collectively, "appellants";
4. Exhibit C: Email Comments from Aaron Goodman and Responses
5. PMND and Initial Study.

STAFF INITIATED TEXT CHANGES:

The third line of the PMND replacement cover sheet dated May 27, 2015, is revised as follows to remove an incorrect reference to the project's residential units as "dwelling units," which has a specific meaning under the *Planning Code* and is not applicable to the proposed project (deleted text is shown in ~~striketrough~~; new text is shown in double underline):

The proposed project would involve the demolition of the existing Main Building (including West and Infirmary Wings) on the Jewish Home campus and construction of two new buildings up to 78 feet tall containing a total of 210 "Residential Care Facility for the Elderly" (assisted living and memory care) ~~dwelling~~ units, as well as retail and support spaces. Four other existing buildings on the site would remain. The new buildings would front on Mission Street and Avalon Avenue, and a new vehicular entry court would be constructed from a proposed new driveway on Avalon Avenue at London Street. The project would also include implementation of medical care, wellness and other programs for a range of older adults—both Jewish Home residents and others—and their caregivers on a central location in the Jewish Home campus referred to hereafter as "The Square."

PMND page 1, footnote 3, is revised as follows to reflect the March 20, 2015, reorganization and definition consolidation in the *Planning Code* (deleted text is shown in ~~striketrough~~; new text is shown in double underline):

³ Planning Code Section ~~209.1~~, 102 "Residential Care Facility".

RECOMMENDATION:

Staff recommends that the Planning Commission adopt the motion to uphold the PMND. No relevant information to support a fair argument that the proposed project would have a significant effect on the environment has been presented that would warrant preparation of an Environmental Impact Report. By upholding the PMND (as recommended), the Planning Commission would not prejudge or restrict its ability to consider whether the proposed project's uses or design is appropriate for the neighborhood.



SAN FRANCISCO PLANNING DEPARTMENT

Planning Commission Motion

HEARING DATE: August 13, 2015

Hearing Date: August 13, 2015
Case No.: 2011.1323E
Project Address: Jewish Home of San Francisco
302 Silver Avenue
Zoning: Residential – House, Two Family (RH-2)
50-X Height and Bulk District (50-X)
Block/Lot: 5952/002
Project Sponsor: Jan Reicher, Director of Strategic Planning
415-562-2505 – jreicher@jewishseniorlivinggroup.org
Staff Contact: Michael Jacinto – (415) 575-9033
michael.jacinto@sfgov.org

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ADOPTING FINDINGS RELATED TO THE APPEAL OF THE PRELIMINARY MITIGATED NEGATIVE DECLARATION, FILE NUMBER 2011.1323E FOR THE PROPOSED DEVELOPMENT (“PROJECT”) AT THE JEWISH HOME OF SAN FRANCISCO, 302 SILVER AVENUE.

MOVED, that the San Francisco Planning Commission (hereinafter “Commission”) hereby AFFIRMS the decision to issue a Mitigated Negative Declaration, based on the following findings:

1. On June 18, 2014, pursuant to the provisions of the California Environmental Quality Act (“CEQA”), the State CEQA Guidelines, and Chapter 31 of the San Francisco Administrative Code, the Planning Department (“Department”) received an Environmental Evaluation Application form for the Project, in order that it might conduct an initial evaluation to determine whether the Project might have a significant impact on the environment.
2. On May 27, 2015, the Department determined that the Project, as proposed, could not have a significant effect on the environment.
3. On May 27, 2015, a notice of determination that a Mitigated Negative Declaration would be issued for the Project was duly published in a newspaper of general circulation in the City, and the Mitigated Negative Declaration posted in the Department offices, and distributed all in accordance with law.
4. On June 17, 2015, an appeal of the decision to issue a Mitigated Negative Declaration was timely filed by Trevor Hamden, Hon Tran, Richard Cowie, Shannon Noonan, and Grace D’Anca; collectively, “appellants.”
5. Staff memoranda, dated August 6, 2015, address and respond to the concerns raised by the appellants in the appeal letter and by the commenter in the submitted comments. That memoranda

are attached as Exhibits A and C and incorporated by this reference herein as the Commission's own findings. Copies of memoranda have been delivered to the City Planning Commission, and copies are on file and available for public review at the San Francisco Planning Department, 1650 Mission Street, Suite 400.

6. On August 13, 2015, the Commission held a duly noticed public hearing on the appeal of the Preliminary Mitigated Negative Declaration (PMND), at which testimony on the merits of the appeal, both in favor of and in opposition to, was received.
7. All issues raised at the hearing on the appeal of the Preliminary Mitigated Negative Declaration at the August 13, 2015, City Planning Commission have been responded to either in the memoranda or orally at the public hearing.
8. After consideration of the PMND and the points raised by appellant, and all other comments, both in writing and at the August 13, 2015, hearing, the San Francisco Planning Department reaffirmed its conclusion that the proposed project could not have a significant effect upon the environment.
9. In reviewing the Preliminary Mitigated Negative Declaration issued for the Project, the Planning Commission has had available for its review and consideration all information referred to above and that pertaining to the Project in the Planning Department's case file and hereby finds based upon the whole record that there is no relevant information to support a fair argument that the proposed project would have a significant effect on the environment.
10. The Planning Commission also finds that the Planning Department's determination on the Mitigated Negative Declaration reflects the Department's independent judgment and analysis that the Mitigated Negative Declaration is adequate, accurate, and complete.

The City Planning Commission HEREBY DOES FIND that the proposed Project, could not have a significant effect on the environment, as shown in the analysis of the Mitigated Negative Declaration, and HEREBY DOES AFFIRM the decision to issue a Mitigated Negative Declaration, as prepared by the San Francisco Planning Department.

I hereby certify that the foregoing Motion was ADOPTED by the City Planning Commission on August 13, 2015.

Jonas Ionin
Commission Secretary

AYES:

NOES:

ABSENT:

ADOPTED: August 13, 2015

Exhibit A - Planning Department Response to Appeal of Preliminary Mitigation Negative Declaration



SAN FRANCISCO PLANNING DEPARTMENT

MEMO

Exhibit A to Draft Motion Planning Department Response to Appeal of Preliminary Mitigated Negative Declaration

CASE NO. 2011.1323E – JEWISH HOME OF SAN FRANCISCO (302 SILVER AVENUE)
PUBLISHED ON MAY 27, 2015

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BACKGROUND

An environmental evaluation application (Case No. 2011.1323E) for the proposed project at 302 Silver Avenue (Assessor's Block 5952, Lot 002) was filed on behalf of the Jewish Home of San Francisco (Jewish Home) on June 18, 2014, for a proposed project that would involve the demolition of the existing Main Building (including West and Infirmary Wings) on the Jewish Home campus and construction of two new buildings up to 78 feet tall containing a total of 210 "Residential Care Facility for the Elderly" (assisted living and memory care) units, as well as retail and support spaces. Four other existing buildings on the site would remain. The new buildings would front on Mission Street and Avalon Avenue, and a new vehicular entry court would be constructed from a proposed new driveway on Avalon Avenue at London Street. The project would also include implementation of medical care, and other wellness programs for a range of older adults, including Jewish Home residents, their caregivers, and others in a central location on the Jewish Home campus referred to hereafter as "The Square." The Square would occupy a total of 45,100 square feet of space within existing and proposed buildings. On-site parking spaces would increase from the existing 166 to 224, and would be accommodated in an underground parking garage beneath the new buildings and in the existing at-grade, on-campus parking spaces. Vehicle access to the Jewish Home campus would be from both the Avalon Entry Court noted above and the existing Silver Avenue entrance; the existing Mission Street vehicle exit would be removed. The new buildings would provide new pedestrian access to the campus interior from Mission Street.

The project site is within the Residential-House, Two Family (RH-2) Use District, and is within a 50-X Height and Bulk District. The project would require Planning Commission approval of a Conditional Use authorization; a Planned Unit Development permit; approval of a Special Use District; amendment of the site's 50-foot height limit to up to 80 feet to accommodate the new buildings; a General Plan bulk amendment and a *General Plan* referral, among other approvals. These would constitute the Planning Department project approval actions under Chapter 31 of the *San Francisco Administrative Code*.

A Preliminary Mitigated Negative Declaration (PMND) was published on May 27, 2015. On June 12, 2015, five individuals (Trevor Hamden, Hon Tran, Richard Cowie, Shannon Noonan, and Grace D'Anca; collectively, "appellants") filed a letter appealing the PMND. Copies of the appeal letter are included within this appeal packet.

The concerns listed below are direct quotations presented in the order that they appear in the appeal letter. The letter states, “As immediate neighbors we are concerned about the following negative impacts on the environment:”

CONCERN 1: Traffic-generated air emissions and traffic and operational noise

“Air & noise pollution from increased traffic along proposed new entrance on Avalon Avenue and idling cars in drop-off turnaround inside said entrance. Further noise pollution from any electrical generator/air conditioning units on top of the proposed new buildings.”

RESPONSE TO CONCERN 1: The proposed project’s impacts to air quality are analyzed in PMND Section E.6, Air Quality, on pp. 77 through 94. Under CEQA, impacts are considered significant if a project, through construction or operations, would result in air pollutant emissions that conflicts with an applicable air quality plan, violate an air quality standard, result in a cumulatively considerable increase of criteria air pollutants for which the region is in non-attainment, expose sensitive receptors to substantial pollutant concentrations, or create objectionable odors. As is set forth in the PMND and summarized below, the proposed project, with incorporated mitigation, would not result in a significant impact on air quality.

Emissions associated with vehicular exhaust are criteria air pollutants. As stated on p. 89 of the PMND, the project would result in an increase of 635 daily vehicle trips to the site. As shown in PMND Table 8 on p. 90, criteria pollutant emissions from vehicle traffic would be far below the applicable significance thresholds, representing, at most, 9.3 percent of the emissions necessary for a significant effect. Moreover, total emissions from mobile sources, in combination with other operational emissions sources, would likewise be well below the thresholds for criteria pollutant (ROG, NO_x, PM₁₀ and PM_{2.5}).

Regarding air quality impacts associated with vehicle idling, many effects of criteria pollutants are regional in nature, but effects of diesel particulate matter and carbon monoxide can be localized in nature.

Particulate matter, particularly fine particulate matter (PM_{2.5}) (inclusive of diesel particulate matter), can have localized effects, which is why, as stated on PMND p. 82, “San Francisco partnered with the BAAQMD 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.” The project site is not within the resulting “Air Pollutant Exposure Zone,” meaning that air quality is relatively better than in some other parts of the City. Moreover, vehicular PM_{2.5} emissions from the project would reach only 2.0 percent of the applicable significance threshold. Regarding carbon monoxide, this criteria pollutant is no longer routinely analyzed in CEQA documents, as it once was, because modern cars emit substantially less carbon monoxide than was historically the case: as stated on PMND p. 80, project traffic in addition to existing traffic would need to exceed 44,000 vehicles per hour at an intersection to represent a significant impact; the project’s 635 daily vehicle trips, even if all of the new vehicle traffic were to

be to-and-from the new entrance at the Avalon/London entrance—which is not the case, as the existing entrance/exit at Silver Avenue would remain in use, would represent less than 1.5 percent of this threshold, and the most heavily trafficked street in the vicinity—Mission Street—has a maximum daily two-way vehicle volume of approximately 15,000 to 16,000 vehicles at locations proximate to the project site. Vehicle idling would not result in substantial carbon monoxide emissions because the number of vehicles dropping off or picking up passengers would, even combined with local traffic, be far too small to result in an exceedance of carbon monoxide standards. Based on the foregoing, project traffic, including vehicles using the new project entrance at Avalon Avenue and London Street, would have a less-than-significant effect on air quality, consistent with the conclusions of the PMND.

Noise impacts are analyzed in PMND Section E.5, on pp. 66 to 77. Under CEQA, noise impacts are considered significant if a project, during construction or operation, results in noise in excess of standards, excessive vibration, or a substantial temporary or periodic increase in ambient noise levels. Or, a project could result in a significant effect if it would be substantially affected by existing noise levels. As is set forth in the PMND and summarized below, the proposed project, with incorporated mitigation, would not result in a significant impact on noise.

The noise effects of traffic are analyzed under PMND Impact NO-3 on pp. 75 and 76. As stated there, traffic volumes must double to result in a 3-decibel increase in noise, which would be considered significant. The project's traffic analysis found that traffic volumes would not double (the peak-hour increase in volume would be 83 vehicles, or about 13 percent of existing volumes, and the daily increase would be similar), and therefore the PMND correctly concluded that traffic noise would be less than significant.

As stated on PMND p. 75, operational noise can also be associated with mechanical equipment, such as heating and ventilation systems. The new equipment to be installed would be similar to those currently used at other buildings on the project site and would not be expected to result in a substantial increase in ambient noise levels in the project vicinity. These sources would be subject to Section 2909 of the Noise Ordinance, which establishes noise limits for mechanical equipment. Under Section 2909, stationary sources on residentially zoned property, such as the project site, are not permitted to result in noise levels that exceed the existing ambient noise level by more than 5 dBA at the property line.

As stated on PMND p. 13, a new generator would also be installed as part of the proposed project. Emergency generators are excluded from regulation under the Noise Ordinance. However, the proposed generator would be shielded to industry standards, and it would be a new model, which would produce less noise than the older existing models currently at the site. Engine operations associated with the back-up generator would be intermittent and associated with routine testing conducted during daytime hours; typically, such backup generators are operated for testing for approximately one hour per week. Therefore, the operational noise impact of the back-up generator would be less than significant.

The appellants have provided no relevant evidence to support a fair argument that air quality and noise impacts would be significant or that an EIR is required. The PMND reached the appropriate conclusions regarding impacts associated with traffic generated and other air pollutant emissions and noise generation.

CONCERN 2: Water quality impacts associated with impervious surfaces

“Water pollution as a result of increased run-off & removal of natural surface drainage with the proposed replacement of the current grass area & removal of at least 12 trees (with decades of growth) at the corner of Avalon & Mission with buildings & impervious surface.

RESPONSE TO CONCERN 2: Utility capacity impacts are analyzed in PMND Section E.10, Utilities and Service Systems, pp. 102 to 113. CEQA’s assessment of impacts considers whether a project would require the construction of new utility facilities or expansion of existing facilities, the construction of which could cause significant environmental effects, or be served by a utility provider with inadequate capacity to accommodate the project’s needs. As is set forth in the PMND and summarized below, the proposed project would not result in a significant impact on utilities and service systems.

Impacts to hydrology and water quality are analyzed in PMND Section E.14, pp. 126 to 132. CEQA’s assessment of impacts considers whether a project would violate water quality standards, alter drainage patterns in a manner that would result in substantial erosion or flooding, create or contribute runoff exceeding the capacity of planning stormwater drainage systems, or otherwise degrade water quality. As is set forth in the PMND and summarized below, the proposed project would not result in a significant impact on hydrology or water quality.

Impacts to biological resources are analyzed in Section E.12, Biological Resources. Specifically, a project would be considered to have a significant impact related to vegetation removal if such removal results in a substantial adverse effect on special-status species, riparian corridors, federally protected wetlands, or wildlife corridors or nurseries, or conflict with tree preservation or habitat conservation policies or plans. However, any effects of vegetation removal on stormwater runoff quantity and quality are analyzed in Section E.14. As is set forth in the PMND and summarized below, the proposed project would not result in a significant impact on hydrology or water quality or biological resources.

As described in the PMND project description on pp. 7 through 9, and illustrated in PMND Figures 2 and 3, on pp. 4 and 10, respectively, much of the development under the proposed project would occur on areas currently covered by impervious surfaces (the existing Main Building, including its West Wing and Infirmary, and existing surface parking lots between the Main Building and the corner of Mission Street and Avalon Avenue). Nevertheless, the proposed project would result in an increase in the amount of impervious surface on the project site. The

existing impervious surface is 86,650 square feet, and the proposed impervious surface is 95,950 square feet.

Stormwater capacity impacts are under Impact UT-2 on p. 105. As stated on PMND p. 105, “The proposed project would be required to meet the standards for stormwater management identified in the San Francisco Stormwater Management Ordinance and would be designed to meet the San Francisco 2010 Stormwater Design Guidelines, which would reduce the total stormwater runoff volume and peak stormwater runoff rate through the use of low impact designs approaches and BMPs including landscape planters designed to capture rain water.” For sites with existing imperviousness of greater than 50 percent, such as the project site, adherence to the guidelines would ensure that stormwater runoff rate and volume is decreased by 25 percent from the pre-development conditions for 2-year 24-hour design storm.

Stormwater runoff impacts are analyzed under Impact HY-1 on pp. 127 to 130. As explained on page 129, “the project sponsor would be required to incorporate low-impact design (LID) techniques into the design and to implement stormwater BMPs to reduce the flow rate and volume of stormwater entering the combined sewer system, which would also reduce the amount of stormwater pollutants that would otherwise be discharged to the combined sewer system.” As explained on PMND p. 130, the project’s Stormwater Control Plan must be reviewed and stamped by a licensed landscape architect, architect, or engineer, and must be approved by the San Francisco Public Utilities Commission. Among other things, the Plan must include source controls, treatment best management practices, and an operations and maintenance plan.

The project’s impacts related to potential conflicts with tree preservation policies are analyzed under Impact BI-2 on pp. 117 and 118 of the PMND. As described on p. 118, the proposed project would remove approximately 82 trees, including several large cypress trees near the corner of Mission Street and Avalon Avenue. Of the trees to be removed, 41 are less than 12” in diameter, 17 are 12” to 18” in diameter, 5 are 20” to 36” in diameter, and 19 are multi-stem. Five protected trees of the 67 protected trees on the campus will be removed. Trees removed would primarily comprise saplings, multi-stem and young trees around the Main Building and Infirmary and West Wings, as well as some of the trees near the corner of Mission Street and Avalon Avenue, where the two new buildings would be constructed. It is estimated that three of the large cypress trees at this location would be retained. As further stated on PMND p. 118, the proposed project also “would include installation of new landscaping along the Avalon Avenue frontage, between the new buildings and the street, as well as along the new Avalon Avenue driveway. Additional landscaping would occur within the interior of the project site, in much of the area currently occupied by the existing central pavilion of the Main Building. Portions of the project site’s Mission Street frontage would be improved in a manner generally consistent with the City’s Better Streets Plan, including some combination of wider sidewalks, bulbouts, street trees, and potentially a small plaza.” Despite the proposed vegetation removal, the installation of new vegetation and landscaping, and adherence to the San Francisco 2010 Stormwater Design Guidelines would serve to capture stormwater runoff, maintain adequate drainage, and prevent erosion. Accordingly, the PMND properly determined that the proposed project would result in a less-

than-significant impact with respect to water quality. The appellants have provided no relevant evidence to support a fair argument that an EIR is required due to water quality impacts.

CONCERN 3: Impacts related to loss of natural light, shading, and increased artificial light

“Loss of natural light and shading issues in immediate surrounding area with the proposed increased building heights.

“Light pollution in surrounding area from artificial lighting from the proposed new building and proposed retail section.”

RESPONSE TO CONCERN 3: Shadow impacts are analyzed in PMND Section E.8, Wind and Shadow, on pp. 97 to 99. CEQA’s assessment of impacts considers whether projects may result in significant impacts if they create new shadow in a manner that substantially affects outdoor recreation facilities or other public areas. As is set forth in the PMND and summarized below, the proposed project would not result in a significant impact related to wind or shadow.

Shadow impacts are analyzed under Impact WS-2 on pp. 98 and 99. As indicated on p. 99, a shadow fan was prepared for the project and is available for review in the project case file. As stated on PMND p. 98, a project would have a significant impact if it would create new shadow in a manner that substantially affects outdoor recreation facilities or other public areas. The closest public open space that falls under the jurisdiction of the San Francisco Recreation and Park Department (where net new shadow is restricted by Section 295 of the *Planning Code*) is Cayuga and Lamartine Minipark, 700 feet northwest of the project site. Based on the shadow fan prepared for the proposed project, the project would not cast shadow on this, or any other, public open space under the jurisdiction of the Recreation and Park Department.

For informational purposes, PMND p. 99 provides additional information summarizing shadow impacts from the new buildings, as follows. In the early morning hours (between approximately 1 hour after sunrise and 3 hours after sunrise) all year, the new buildings at the southwest corner of the project site would cast shadow westward onto and across Mission Street. As the morning progresses, shadows would shorten and turn northward. From about midday (approximately 11:00 a.m. to 1:00 p.m.) onward, shadows would be cast onto the Jewish Home campus itself, including existing and new public spaces. During the late spring / early summer months, during the late afternoon and early evening (from approximately 4:00 p.m. to 2 hours before sunset), shadow would also be cast southeastward, across Avalon Avenue toward existing residential properties.

Because the new buildings would be taller and generally closer to the property line than existing buildings, much of this shadow would be net new shade, while other project shadows would fall in locations already shaded by the existing buildings to be demolished or, in some cases, by other intervening buildings. The net new shadow would result in a loss of direct sunlight at the times

when shadow would fall on a particular location, but it would not result in a complete loss of natural light. Ambient natural light is present during daytime hours, regardless of whether direct sunlight is cast on specific locations.

As stated on p. 99, the net new shadow would be of limited duration, and would not be expected to substantially affect the use of the campus outdoor spaces or nearby sidewalks. The shadow impact would be less than significant.

Regarding light pollution, as explained in PMND Section E, Evaluation of Environmental Effects, on pp. 31 and 32, SB 743 became effective on January 1, 2014. SB 743 amends CEQA by adding Public Resources Code Section 21099 regarding the analysis of aesthetics (and parking) impacts for urban infill projects. Public Resources Code Section 21099(d) provides that aesthetic impacts of a residential project in close proximity to transit routes on infill sites shall not be considered significant impacts on the environment. Therefore, SB 743 and Public Resources Code Section 21099 eliminated the aesthetics analysis, including analysis of light and glare.

The following information is provided for informational purposes. The proposed project would result in some new night lighting that would be visible through building windows, as well as outdoor lighting along buildings, walkways, and parking and vehicular circulation areas. The new lighting would occur in an established urban neighborhood where night-lighting from dwellings and businesses already occurs, and it would be located primarily on the campus, away from nearby public spaces. Lighting would be designed and positioned to minimize glare and spillover beyond the project site boundaries. Compliance with Planning Commission Resolution No. 9212, which prohibits the use of mirrored or reflective glass, would minimize glare. Accordingly, the PMND correctly determined that the proposed project would result in a less than significant impact on shadow. As described previously, under state law, lighting (an aesthetics topic) is not a basis for identifying significant environmental impacts of the project.

The appellants have provided no relevant evidence to support a fair argument that shadow impacts would be significant or that an EIR is required, and the PMND reached the appropriate conclusions regarding impacts associated with project-generated shadow. Also, pursuant to SB 743, aesthetics impacts for this project are not considered significant under CEQA.

CONCERN 4: Building height increased and impact on neighborhood character

“The 8 story elevation proposed will be the tallest building on the Excelsior Commercial Corridor setting a precedent for other proposed height variances irreparably changing the character of the R-1 zoned neighborhood.”

RESPONSE TO CONCERN 4: Land use character impacts are analyzed in PMND Section E.1 on pp. 33 to 36. CEQA’s assessment of impacts considers whether a project would physically divide an established community, conflict with applicable land use plans adopted for the purpose of

avoiding or mitigating an environmental effect, or have a substantial adverse impact upon the existing character of the vicinity. As is set forth in the PMND and summarized below, the proposed project would not result in a significant impact on land use or land use planning.

Also as noted at PMND p. 35, the proposed buildings would be taller and bulkier than surrounding development. However, heights per se, including height increases, are not a basis for identifying a significant impact. As stated at PMND p. 33, the physical changes proposed are with the existing campus and involve minimal upgrades to the site perimeter. The physical environmental impacts associated with height—such as shadow, wind, and land use impacts—are discussed in the PMND.

Proposed building heights above grade are shown in the PMND Project Description, in Figure 4 on p. 12. As stated on PMND p. 9, most of Building 1A would be 5 to 6 stories (approximately 53 feet) above grade, although just 39 feet above grade along Avalon Avenue. The building would reach a maximum height of 7 stories (75 feet) above grade at its northern- and westernmost point. This portion of the building reaching 75 feet in height would be approximately 72 feet long on its Mission Street façade, and it would be set back from the Mission Street property line. Building 1B would be six stories (approximately 64 feet) above grade along Mission Street.

Land use character impacts are analyzed under Impact LU-3 on pp. 35 and 36. A project would have a significant impact with respect to land uses if it has a substantial impact upon the existing character of the vicinity. Increasing the intensity of residential care for the elderly use would not conflict with the primarily residential character of the surrounding neighborhood. The project would be a continuation of a long-standing institutional use in a mixed-used residential community (e.g., the site's character is long-established and is distinct in its institutional use in a neighborhood primarily of single-family homes with areas of some nearby commercial developments). The Jewish Home campus, comprising one large block, has been part of that neighborhood context and already presents a break in the adjacent block and lot patterns of the residential neighborhoods surrounding the site. The intensified institutional use would be a change, but it would not introduce incompatible land uses, and would continue a tradition of adaptive land use changes on the site over time. In addition, the change in building heights compared to existing conditions would not be substantial in conjunction with the existing buildings of various heights across the sloped topography of the site. The proposed project would activate the site perimeter on Mission Street, which would create street frontage with retail use and/or active street frontages that are consistent with nearby locations along Mission Street. As stated on p. 36, the proposed project's impact on the existing character of the vicinity would be less than significant.

Wind and shadow impacts are analyzed in PMND Section E.8, pp. 97 to 100. CEQA's assessment of impacts considers whether the project would create new shadow or alter wind in a manner that substantially affects outdoor recreation facilities or other public areas. As is set forth in the PMND and summarized below, the proposed project would not result in a significant impact on wind or shadow.

As stated on p. 98, the height and massing of the buildings would not be expected to create a vertical surface sufficiently large to catch and direct substantial amount of winds down to pedestrian level. As stated on p. 99, the net new shadow would not reach public parks under the jurisdiction of SFRPD. Shadow would be of limited duration, and would not be expected to substantially affect the use of public open spaces or sidewalks. Therefore, the wind and shadow impacts would be less than significant.

Regarding impacts to visual character, as explained in the prior response to Concern 3, PMND Section E, Evaluation of Environmental Effects, on pp. 31 and 32, SB 743 became effective on January 1, 2014. SB 743 amends CEQA by adding Public Resources Code Section 21099 regarding the analysis of aesthetics (and parking) impacts for urban infill projects. Public Resources Code Section 21099(d) provides that aesthetic impacts of a residential project in close proximity to transit routes on infill sites shall not be considered significant impacts on the environment. Therefore, SB 743 and Public Resources Code Section 21099 eliminated the analysis of aesthetics impacts, including analysis of visual character impacts, in CEQA review.

Accordingly, the PMND correctly determines that the proposed project would have a less than significant impact on land use and other topics associated with height increases, and under state law, visual character does not provide a basis for identifying significant impacts of the project.

Regarding precedent, the proposed Special Use District Height Map is shown in PMND Figure 10 on p. 23. As shown there, the proposed 65-X and 80-X Height and Bulk Districts would be limited to the southwestern portion of the Jewish Home campus; in particular, as shown on Figure 10, the proposed 65-X Height and Bulk District would occupy approximately 25.3 percent of the Jewish Home campus, and the 80-X Height and Bulk District would occupy approximately 1.9 percent of the Jewish Home campus. Heights on the remaining 72.8 percent of the campus would be regulated by the 50-X Height and Bulk District, as under existing conditions. These height and bulk districts are proposed to respond to the proposed project's urban design and building program, as well as the surrounding campus and adjacent uses.

The 80-X Height and Bulk District would be set back from Mission Street opposite Tingley Street, where the westernmost portion of the proposed Building 1A would rise up to 75 feet to accommodate a small portion of the top floor and roof structure, due to the site sloping in multiple directions. The existing 50-X height and bulk district would be maintained across the remainder of the campus. The height and bulk districts of the surrounding community would not be affected. In addition—the existing use districts of the surrounding neighborhood, which comprise the Excelsior Outer Mission Street Neighborhood Commercial District (NCD) along Mission Street, the Two-Family House (RH-2) residential district at the project site and along London Street, and the Single-Family House (RH-1) residential district on most other properties—would be maintained.

An amendment to the City's height and bulk map is a legislative (discretionary) action by the San Francisco Board of Supervisors. As stated on PMND p. 22, the Board of Supervisors must approve legislation to amend the height and bulk districts on the Jewish Home site. It would be speculative to state that a change in height limits on the project site would lead to other proposals or potential changes to building height controls in the project site vicinity. No such proposed height amendments currently exist.

The appellants have provided no relevant evidence to support a fair argument that land use, shadow, or wind impacts would be significant or that an EIR is required. The PMND reached the appropriate conclusions regarding impacts associated with proposed building heights. Also, pursuant to SB 743, aesthetic impacts for this project are not significant under CEQA.

CONCERN 5: Demands for public utilities and infrastructure

"Dramatic increase of residents from 374 to 584 adding demands on utilities and other infrastructure."

RESPONSE TO CONCERN 5: Effects on infrastructure can be categorized into effects on transportation infrastructure and operations, public services, and utilities. Impacts to transportation and circulation are analyzed in PMND Section E.4, pp. 53 to 66. CEQA's assessment of impacts considers whether the project would conflict with plans establishing measures of effectiveness for performance of the circulation system, or conflict with a congestion management plan. As is set forth in the PMND and summarized below, the proposed project would not result in a significant impact on transportation and circulation. Public Services impacts are analyzed in Section E.11, pp. 113 to 115. CEQA's assessment of impacts considers whether the project would result in substantial adverse physical effects associated with construction or expansion of new or physically altered facilities to ensure the provision of public services. As is set forth in the PMND and summarized below, the proposed project would not result in a significant impact on public services. Utility capacity impacts are analyzed in PMND Section E.10, Utilities and Service Systems, pp. 102 to 113. CEQA's assessment of impacts considers whether a project requires the construction of new utility facilities or expansion of existing facilities, the construction of which could cause significant environmental effects, or be served by a utility provider with inadequate capacity to accommodate the project's needs. As is set forth in the PMND and summarized below, the proposed project would not result in a significant impact on utilities and service systems.

The proposed project would result in a net increase of 245 residents on the approximately nine acre project site, as shown in the PMND Project Description in Table 1 on p. 11. According to the May 2012 *San Francisco Neighborhoods Socio-Economic Profiles*,¹ the Excelsior neighborhood (which includes the project site), had a population of 37,960 residents in 2010. The net addition of 245

¹ San Francisco Planning Department, *San Francisco Neighborhoods Socio-Economic Profiles: American Community Survey 2006 – 2010*, available online: <http://www.sf-planning.org/modules/showdocument.aspx?documentid=8779>, May 2012.

residents would represent 0.6 percent (six-tenths of 1 percent) of the 2010 residential population. As explained on PMND p. 21, the project would also result in a net increase of 135 on-site employees and volunteers. And as stated on PMND p. 17, The Square would serve approximately 200 visitors and adult day programs could serve an additional 25 non-residents.

These new residents, employees, volunteers and visitors would utilize existing infrastructure, including local roadways; police and fire protection; recreational spaces; and water, wastewater, and solid waste services. However, the net increase in residents, employees, volunteers and visitors would not be considered substantial or “dramatic” within the context of the existing populations serviced by these infrastructure systems, and can be easily accommodated within the context of the associated infrastructure systems and services.

Impacts to transportation and circulation are analyzed on PMND pp. 53 to 66. As shown in Table 2 on p. 55, the new residents, visitors, volunteers and employees of the project site would generate 95 vehicle trips, 26 transit trips, 21 walk trips, and 3 bicycle trips during the p.m. peak hour. All but one of the study intersections would operate at the same levels of service as under existing conditions, and the level of service at the remaining intersection would remain acceptable. As stated under Impact TR-4 on pages 59 to 61, the increased transit riders, cyclists, and pedestrians would not substantially affect the capacity of local transit lines, bicycle lanes, and pedestrian facilities. This concern is also addressed in comments #1 above and #6 below.

Impacts to police and fire are analyzed in on pp. 113 and 114. Given the project site is located near, and already served by, existing police and fire protection services, the net increase in project residents, employees, volunteers and visitors would not be expected to affect police and fire services to the extent that new or physically altered protection facilities would be required. Similarly, the net increase in project site residents and employees and volunteers could increase the use of neighborhood recreational facilities, but not to the extent that would result in significant environmental impacts, as described in PMND Section E.9, Recreation, on pp. 100 to 101.

Regarding utilities, as stated on PMND p. 107, the project would generate net new water demand representing 0.04 percent (four hundredths of 1 percent) of the total demand of the San Francisco Public Utilities Commission San Francisco retail distribution system. (It would represent an even smaller percentage of the wholesale distribution system, which serves both the City of San Francisco and other communities.) As explained under Impact UT-1 on pages 103 to 105, the net increase in wastewater flows associated with this increased water demand would be accommodated within the 63 mgd dry weather capacity and 150 mgd per day wet weather capacity for secondary treatment. Finally, as discussed on PMND page 109, the proposed project would incrementally increase total waste generation from the City, but the increasing Citywide diversion rate through recycling and other methods would result in a decreasing share of total waste that requires deposition into the landfills that serve (and will serve) the City. Therefore, the project’s resulting net increases in demand for utilities would not be considered dramatic in the context of the extent of services provided by these utilities.

Accordingly, the PMND correctly determines that the proposed project would result in less than significant impacts on infrastructure and utilities. The appellants have provided no relevant evidence to support a fair argument that impacts related to demand on public utilities and on infrastructure would be significant or that an EIR is required.

CONCERN 6: Impacts of The Square and operations or employment on neighborhood traffic and parking

“The additional impact of 200 day time clients of The Square services center adding to already significant dangerous traffic, and parking issues immediately surrounding the Jewish Home and spilling into the 300 foot surrounding area.”

“Current staff of 700 staff plus 125 more anticipated staff will not have access to free parking on the Jewish Home campus impacting already heavy parking and traffic in the immediate neighborhood.”

RESPONSE TO CONCERN 6: Impacts to transportation and circulation are analyzed in PMND Section E.4, pp. 53 to 66. CEQA’s assessment of impacts considers whether the project CEQA’s assessment of impacts related to travel demand considers whether the project would conflict with plans establishing measures of effectiveness for performance of the circulation system, or with a congestion management plan. As is set forth in the PMND and summarized below, the proposed project would not result in a significant impact on transportation and circulation.

Regarding parking, as explained on PMND p. 64, the proposed project is within the directive of Public Resources Code Section 21099(d) which provides that parking (and aesthetic) impacts of a residential project in close proximity to transit routes on infill sites shall not be considered significant impacts on the environment. Therefore, the adequacy of parking in determining the significance of project impacts under CEQA is not considered. Nonetheless, the PMND provides a comparison of project parking supply and demand on p. 65–66 for informational purposes.

As stated in the PMND Project Description on p. 17, The Square is expected to serve approximately 200 visitors from the City, in addition to the Jewish Home residents, and the adult day services may serve up to an additional 25 non-residents. Approximately 50 percent of these seniors would be brought to the site by shuttle vehicles, 10 percent would be expected to drive themselves, 25 percent would be brought by family members, and the remaining 15 percent would travel to the site using public transportation.

These visitors to the site are accounted for in the transportation analysis. As stated in Table 2 on p. 55, the project would generate 95 vehicle trips, 26 transit trips, 21 walk trips, and 3 bicycle trips during the p.m. peak hour. As concluded under Impacts TR-1 and TR-4, these new users of the transportation network would result in less-than-significant impacts to traffic, transit, bicycle, and pedestrian levels of service. The Square use itself would generate trips mostly outside of the peak

hour, and as indicated on Table 2, would contribute only 26 peak hour vehicle trips, and staff would contribute 46 net new trips, all of which are included in the overall peak hour analysis, together with trips from residents, visitors and retail.

With respect to parking, as stated in the PMND Project Description on p. 17, the project would increase the on-site parking supply from the existing 166 spaces to 224 spaces. Up to 50 additional spaces could be available through valet services during major events. Also, as stated on p. 19, contingent upon approval from SFMTA, the project sponsor proposes conversion of parallel parking to diagonal parking on Lisbon Street, which would result in a net increase of 10 to 15 new spaces (which would be partially offset by bus zones on Mission Street and a curb cut on Avalon Avenue at London Street.)

The project would have a peak parking demand of 357 spaces at about 3:00 p.m., during the day/evening shift change, which would not be accommodated within the off-street supply of 224 spaces. This is consistent with the existing parking shortfall during the shift change period. However, the lower demand during the evening hours would continue to be fully accommodated within the off-street supply. The proposed conditions of approval for the project, which would be considered by the decision-makers (Planning Commission and Board of Supervisors), include a TDM program designed to increase use of transit and other alternatives to single occupant vehicle use.

Accordingly, the PMND properly determines that the project would not result in significant transportation impact. The appellants have provided no relevant evidence to support a fair argument that impacts would be significant or that an EIR is required. Under state law, parking shortfalls in and of themselves do not provide the basis for identifying significant impacts.

CONCERN 7: Pedestrian safety due to increased traffic at the Avalon/London intersection

“Increased traffic from Jewish Home staff, clients, residents and staff will increase the already dangerous intersection of Avalon London plagued with speeding cars going both up and down Avalon and turning off of and onto London Street which often has blind corners due to parked cars. This intersection is heavily used by children, youth and families going to and from the elementary school and the youth center located at on London at Excelsior on foot, by car and by school bus.”

RESPONSE TO CONCERN 7: Impacts to transportation and circulation are analyzed in PMND Section E.4, pp. 53 to 66 and also discussed above in responses to concerns #1 and #6. CEQA’s assessment of impacts related to traffic and pedestrian safety considers whether the project would substantially increase hazards due to design features, or decrease the performance or safety of transit, bicycle, and pedestrian facilities. As is set forth in the PMND and summarized below, the proposed project would not result in a significant impact on transportation and circulation.

The proposed project's impacts to traffic and pedestrian safety are analyzed on PMND p. 59. As discussed there, the project would result in a significant impact related to traffic safety if it results in substantially increased hazards due to a design feature or incompatible use. The project would not involve these conditions. As stated in the PMND Project Description on pp. 17 and 19, the project would provide 224 on-site parking spaces, with the 59 spaces of structured parking immediately beneath Building 1B only accessible from Avalon Avenue, and the remainder of the 224 spaces only accessible via Silver Avenue; the loading docks at the Rosenberg Building and the Friedman Building also would be only accessible from Silver Avenue. As such, the great majority of project vehicle trips would travel on Silver Avenue, and the fewer number of project vehicle trips on Avalon Avenue would not substantially increase traffic hazards on Avalon Avenue, including at the Avalon/London intersection.² In addition, there is no expectation that the proposed project would generate vehicle trips on London Street.

During preparation of the PMND, the project sponsor and SFMTA explored the installation of a 4-way stop control (stop sign) at the Avalon/London intersection. Based upon collision records and consultation with operational staff, SFMTA recommended against installation of this 4-way stop. The City's crosswalk guidelines do not recommend marking crosswalks at uncontrolled intersections within 300 feet of a controlled crossing (at Avalon Avenue and Mission Street). In addition, there was one documented collision at the intersection in the most recent 5-year period, which SFMTA indicated does not indicate a pattern of collisions that would warrant installation of a stop sign.³

The project would not have an adverse effect on traffic safety for people walking across London Street at the Avalon/London intersection. The appellants have provided no relevant evidence to support a fair argument that traffic safety impacts would be significant or that an EIR is required. Accordingly, the PMND reached the appropriate conclusions regarding impacts.

CONCERN 8: Construction noise

"Construction noise causing problems for night-shift workers/day-time sleepers, homebound seniors and disabled people to include Jewish Home skilled nursing facility patients."

RESPONSE TO CONCERN 8: Noise impacts are analyzed in PMND Section E.5, on pp. 66 to 77. Under CEQA, noise impacts are considered significant if a project, during construction or

² The impact analysis assumes the project's two parking levels would not be connected with an internal ramp. If an internal ramp were to connect the parking levels, there would be an increased use of the Avalon Avenue site access (and decreased use of the Silver Avenue site access), and the impact also would be less than significant, as the Mission Street / Avalon Avenue intersection (at LOS A) has, in such circumstance, excess capacity to accommodate the added traffic.

³ SFMTA, e-mail communication to Van Meter Williams Pollack RE: Jewish Home - Avalon and London Street Intersection, April 28, 2015.

operation, results in noise in excess of standards, excessive vibration, or a substantial temporary or periodic increase in ambient noise levels. Or, a project could result in a significant effect if it would be substantially affected by existing noise levels. As is set forth in the PMND and summarized below, the proposed project, with incorporated mitigation, would not result in a significant impact on noise.

As stated in the PMND Project Description on page 22, it is anticipated that demolition of the Main Building and southerly parking lots would commence in spring 2016 and new construction would begin in summer 2016. The completed project is projected for the second quarter of 2018.

Noise associated with this construction is analyzed under Impact NO-2 on pp. 73 to 75. As stated on page 73, the San Francisco Noise Ordinance limits noise levels from individual pieces of equipment to 80 dBA at 100 feet, or 86 dBA at 50 feet. Existing buildings on the site would be affected by construction. In addition, the closest off-site receptors are residents along Avalon Avenue across from the project site, as well as the Mio Preschool at Mission Street, all approximately 100 feet away. Without the use of acoustic shields or other noise-reduction measures, construction could result in significant noise levels (above 80 dBA at 100 feet, or 86 dBA at 50 feet). Mitigation Measure NO-2, General Construction Noise Controls, is identified to reduce construction noise impacts to less-than-significant levels. The measure calls for utilization of best available noise control techniques, location of muffled stationary noise sources as far as possible from sensitive receptors, use of hydraulically powered impact tools where possible, and submittal of a list of measures to DBI for responding to noise complaints.

The appellants have provided no relevant evidence to support a fair argument that noise impacts would be significant or that an EIR is required. The PMND reached the appropriate conclusions regarding impacts associated with construction noise.

CONCERN 9: Community benefits

“Unclear community benefit - no affordable/below market rate units, no information on cost of market rate units, no information on ‘Square’ membership and/or cost of services, no probability of regular use of space for community groups.”

RESPONSE TO CONCERN 9: This concern does not address the adequacy or the accuracy of the PMND and is outside the scope of CEQA review. CEQA documents are intended to analyze and disclose potential physical environmental impacts, not economic or financial aspects of a project.

REQUEST FOR ENVIRONMENTAL IMPACT REPORT

“Based on our concerns, we request that the San Francisco Planning Commission conduct an Environmental Impact Study to consider the negative impacts to the neighborhood immediately surrounding the Jewish Home to protect and insure the rights of the neighbors’ property and environment.”

RESPONSE TO REQUEST FOR ENVIRONMENTAL IMPACT REPORT: It is assumed that, by this comment, the appellants request preparation of an environmental impact report (EIR). Potential physical environmental impacts of the proposed project are fully analyzed and described in the PMND. The PMND analysis and conclusions are based upon substantial evidence, as described in detail in the PMND. The appellants do not provide any relevant evidence in support of a fair argument that the proposed project will have a significant environmental effect and an EIR is required. As discussed above, the PMND properly concludes as to each topic raised by appellant that, with implementation of the identified mitigation measures, the proposed project would not result in significant physical environmental impacts.

Exhibit B – Appeal Letter

RECEIVED

June 12, 2015

JUN 17 2015

San Francisco Planning Department
Attention Sarah B. Jones
1650 Mission Street, Suite 400
San Francisco CA 94103

CITY & COUNTY OF S.F.
PLANNING DEPARTMENT
RECEPTION DESK

Dear Ms. Jones and San Francisco Planning Department,

We are writing about Case 2011.1323E, the proposed plans for the Jewish Home at 302 Silver Avenue. As immediate neighbors we are concerned about the following negative impacts on the environment:

Air & noise pollution from increased traffic along proposed new entrance on Avalon Avenue and idling cars in drop-off turnaround inside said entrance. Further noise pollution from any electrical generator/air conditioning units on top of the proposed new buildings.

Water pollution as a result of increased run-off & removal of natural surface drainage with the proposed replacement of the current grass area & removal of at least 12 trees (with decades of growth) at the corner of Avalon & Mission with buildings & impervious surface.

Loss of natural light and shading issues in immediate surrounding area with the proposed increased building heights.

Light pollution in surrounding area from artificial lighting from the proposed new building and proposed retail section.

The 8 story elevation proposed will be the tallest building on the Excelsior Commercial Corridor setting a precedent for other proposed height variances irreparably changing the character of the R-1 zoned neighborhood.

Dramatic increase of residents from 374 to 584 adding demands on utilities and other infrastructure.

The additional impact of 200 day time clients of The Square services center adding to already significant dangerous traffic, and parking issues immediately surrounding the Jewish Home and spilling into the 300 foot surrounding area

Current staff of 700 staff plus 125 more anticipated staff will not have access to free parking on the Jewish Home campus impacting already heavy parking and traffic in the immediate neighborhood.

Increased traffic from Jewish Home staff, clients, residents and staff will increase the already dangerous intersection of Avalon London plagued with speeding cars going both

up an down Avalon and turning off of and onto London Street which often has blind corners due to parked cars. This intersection is heavily used by children, youth and families going to and from the elementary school and the youth center located at on London at Excelsior on foot, by car and by school bus.

Construction noise causing problems for night-shift workers/day-time sleepers, homebound seniors and disabled people to include Jewish Home skilled nursing facility patients.

Unclear community benefit - no affordable/below market rate units, no information on cost of market rate units, no information on "Square" membership and/or cost of services, no probability of regular use of space for community groups.

Based on our concerns, we request that the San Francisco Planning Commission conduct an Environmental Impact Study to consider the negative impacts to the neighborhood immediately surrounding the Jewish Home to protect and insure the rights of the neighbors property and environment.

Thank you.

Julia Hansen

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Exhibit C – Planning Department Responses to Project Comments Related to Preliminary Mitigated Negative Declaration



SAN FRANCISCO PLANNING DEPARTMENT

MEMO

Exhibit C to Draft Motion Planning Department Responses to Project Comments Related to Preliminary Mitigated Negative Declaration

CASE NO. 2011.1323E – JEWISH HOME OF SAN FRANCISCO (302 SILVER AVENUE)
PUBLISHED ON MAY 27, 2015

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BACKGROUND

An environmental evaluation application (Case No. 2011.1323E) for the proposed project at 302 Silver Avenue (Assessor's Block 5952, Lot 002) was filed on behalf of the Jewish Home of San Francisco (Jewish Home) on June 18, 2014, for a proposed project that would involve the demolition of the existing Main Building (including West and Infirmary Wings) on the Jewish Home campus and construction of two new buildings up to 78 feet tall containing a total of 210 "Residential Care Facility for the Elderly" (assisted living and memory care) units, as well as retail and support spaces. (Four other existing buildings on the site would remain.) The new buildings would front on Mission Street and Avalon Avenue, and a new vehicular entry court would be constructed from a proposed new driveway on Avalon Avenue at London Street. The project would also include implementation of medical care, and other wellness programs for a range of older adults, including Jewish Home residents, their caregivers, and others in a central location on the Jewish Home campus referred to hereafter as "The Square." The Square would occupy a total of 45,100 square feet of space within existing and proposed buildings. On-site parking spaces would increase from the existing 166 to 224, and would be accommodated in an underground parking garage beneath the new buildings and in the existing at grade on-campus parking spaces. Vehicle access to the Jewish Home campus would be from both the Avalon Entry Court noted above and the existing Silver Avenue entrance; the existing Mission Street vehicle exit would be removed. The new buildings would provide new pedestrian access from Mission Street.

The project site is within the Residential-House, Two Family (RH-2) Use District, and is within a 50-X Height and Bulk District. The project would require Planning Commission approval of a Conditional Use authorization; a Planned Unit Development permit; approval of a Special Use District; amendment of the site's 50-foot height limit to up to 80 feet to accommodate the new buildings; a General Plan bulk amendment and a *General Plan* referral, among other approvals. These would constitute the Planning Department project approval actions under Chapter 31 of the *San Francisco Administrative Code*.

A Preliminary Mitigated Negative Declaration (PMND) was published on May 27, 2015. On June 1 and June 17, 2015, the Planning Department received e-mail correspondence from Aaron Goodman related to the proposed project. The comments were not submitted in the form of an

appeal on the PMND. Although most of the comments pertain to issues outside the scope of CEQA, for information convenience they are summarized and responded to below

COMMENT 1: Future Site Development

The commenter asks about future development of the Jewish Home campus, specifically in the northeastern portion of the campus in the area of the existing parking lot that would be retained under the proposed project. He asks what would be included in such a development, and what urban design, visual compatibility, and open space considerations would be incorporated into such a development. The commenter recommends study of potential future on-site parking to alleviate parking issues in the neighborhood.

Response to Comment 1: The comments regarding future development of the project site have been forwarded to the project sponsor. These comments do not address the adequacy or accuracy of the PMND.

The proposed project description is provided on PMND pp. 1 to 23. The project entails the demolition of the existing Main Building (including West and Infirmary Wings) on the Jewish Home campus and construction of two new buildings reaching a variety of heights from 35 feet to 78 feet, depending on the building and site topography. These buildings would contain a total of 210 “Residential Care Facility for the Elderly” (assisted living) units, as well as retail and support spaces. Four other existing buildings on the site would remain. The Main Building and West and Infirmary Wings are depicted in Figure 2 on PMND p. 3. The site plan is shown in PMND Figure 3 on p. 10. Figure 3 shows the proposed Buildings 1A and 1B in white, and it shows existing buildings to be retained (Rosenberg, Goodman, Koret, and Friedman) in gray.

While an earlier version of the proposed project envisioned a larger development plan, the project was subsequently revised as is now proposed. The currently proposed project has independent utility, and the environmental effects of its construction and operation are analyzed throughout the PMND. There are no current plans to develop the northern portion of the Jewish Home campus, which would remain as a surface parking lot under the proposed project. Any analysis of such additional development would be speculative, and any future expansion of the Jewish Home facility would be subject to the requirements of CEQA, as well as the City’s various discretionary approvals in effect at the time.

The concerns regarding the relative aesthetic cohesiveness of the Jewish Home campus are noted. Note, as indicated on PMND pp. 31 and 32, pursuant to Public Resources Code Section 21099(d), aesthetics are not considered in determining whether the proposed project has the potential to result in a significant effect on the environment under CEQA.

Regarding land use compatibility, as stated in the PMND on pp. 35 to 36, the campus's built environment has adapted to the institution's uses and services over time. Buildings were added as new levels of medical care and social facilities were added, and these new buildings were of a varied character depending on the nature of the services provided, as well as the building sizes and characters typical of their times.

COMMENT 2: Landscaping, Maintenance, and Streetscape

The commenter expresses concerns regarding existing maintenance of the Jewish Home campus--including landscaping, watering, garbage and litter removal, and use of leaf-blowers—and states that these issues would be exacerbated with the proposed project. The commenter suggests a program of neighborhood volunteers for site and street tree maintenance, funded by the project sponsor. The commenter also states that public access should be improved on the site and recommends installation of streetscape improvements, public artwork, security cameras, underground utilities, and improved off-site drainage at the intersection of Peru Avenue and Lisbon Street.

Response to Comment 2: The concerns regarding existing landscaping and site maintenance have been forwarded to the project sponsor. The comments suggesting specific landscaping plantings, streetscape, and funding mechanisms be included as part of the project have also been forward to the sponsor. These comments do not address the adequacy or accuracy of the PMND.

As stated in the PMND Project Description on pp. 19 to 21, the proposed project would include streetscape improvements along adjacent streets, including the alteration and widening of the Mission Street sidewalk with a new hardscape surface, curb extension, and small plaza containing trees and hardscape; new landscaping along the Avalon Avenue frontage; and diagonal on-street parking on Lisbon Street. As stated on PMND p. 61, the improvements would be undertaken in accordance with the City's adopted *Better Streets Plan*.

As indicated in Section E.12, Biological Resources, on pp. 117 to 118, the project site currently contains 290 individual trees, approximately 82 of which would be removed. (Approximately three of the large cypress trees at the intersection of Mission Street and Avalon Avenue would be retained.) Of the trees to be removed, there are 41 less than 12" in diameter, 17 of 12" to 18" diameter, 5 of 20" to 36" diameter, and 19 multi-stem. Five protected trees of the 67 protected trees on the campus will be removed. Trees removed would primarily comprise saplings, ,multi-stem and young trees around the Main Building and Infirmary and West Wings, as well as some of the trees near the corner of Mission Street and Avalon Avenue, where the two new buildings would be constructed. It is estimated that three of the large cypress trees at this location would be retained. The project would be required to plant street trees in accordance with Planning Code requirements, and additional landscaping would occur within the interior of the project site.

Regarding concerns related to existing off-site drainage and water pooling at the intersection of Peru Avenue and Lisbon Street, as stated on PMND page 19, contingent upon endorsement by immediate neighbors and approval by the San Francisco Municipal Transportation Agency (SFMTA), the project sponsor also proposes conversion of parallel parking to diagonal parking at the eastern edge of the Home's campus on Lisbon Street. This conversion, which would move the existing curb-line approximately 3 feet into the existing sidewalk area, would result in a net increase of 10 to 15 new spaces on Lisbon Street. As stated on PMND p. 24, the San Francisco Department of Public Works (SFPDWP) must approve the Lisbon Street parking changes. SFPDWP would review the design to ensure that the diagonal parking does not adversely affect existing drainage.

Project impacts to on-site drainage are addressed in Appeal Response Exhibit A, Concern 2: Water Quality Associated with Increased Impervious Surfaces. As is set further in the PMND and summarized in Appeal Response Exhibit A, the proposed project would not result in a significant impact on hydrology or water quality.

COMMENT 3: Transportation and Parking

The commenter states that the project would generate additional vehicular trips and parking demand that could not be accommodated in the project site vicinity and suggests that transit service be increased to provide an alternative mode of travel. The commenter also states that the project would result in congestion on Silver Avenue—due to the closing of the Mission Street exit and potential truck loading and unloading on Silver Avenue—that would delay the 44 Bus route. He also suggests improvements along Lisbon Street and Silver Avenue to increase pedestrian safety and reduce speeding.

Response to Comment 3: The concerns related to parking demand, traffic, and pedestrian safety are addressed in the PMND and in response to Concern 7 in Appeal Response Exhibit A. Comments regarding site access, truck parking, and drivers ignoring traffic signals will, along with other issues, be considered by the Planning Commission during project approvals.

COMMENT 4: Suggested Land Use Programming

The commenter suggests that the proposed project include several land uses programs that would serve the surrounding neighborhood, including a fitness center (with a pool), a Jewish deli, a community meeting space, and a local emergency clinic. The commenter also requests that retail uses be vetted by the community. In addition, he asks how many units would be affordable to low-income seniors in the existing community.

Response to Comment 4:

The suggested programming of the proposed project, as well as the suggested future improvements, have been forwarded to the project sponsor for consideration. These comments do not address the adequacy or accuracy of the PMND.

The PMND analyzed the proposed project's land uses in Section E.1, Land Use and Land Use Planning, on pp. 33 to 37. As stated on p. 33, "the proposed project would be a continuation of a long-standing institutional use in a mixed-use residential community, albeit in an intensified manner, and would introduce a new component to the project site (The Square) that would include provision of outpatient medical and other services to non-resident senior members, potentially including local residents. This intensified institutional use would not disrupt the neighborhood or physically divide the community." As further explained on p. 36, "The Square, a proposed collection of site- and neighborhood-serving medical and community use in the Rosenberg Building, as well as the retail use located along Mission Street, would introduce new uses to the project site that would serve both site residents and the surrounding community. The uses would not be incompatible with the project site's existing use or the existing nearby uses. Both the Square's services for non-residents and the neighborhood-serving retail use would not be considered incompatible with the surrounding residential area. The Square would complement the existing uses on the site, as well as create efficiencies for the Jewish Home, the broader Excelsior neighborhood, and others by providing for these services in a centralized location."

The proposed project would not allocate units specifically for low-income seniors in the existing community. The proposed project's impacts on population and housing are analyzed in PMND Section E., pp. 37 to 39. As stated on p. 38, seniors moving to the project site are anticipated to be existing residents of the City of San Francisco or its immediate environs.



SAN FRANCISCO PLANNING DEPARTMENT

Preliminary Mitigated Negative Declaration

Date: May 27, 2015
Case No.: 2011.1323E
Project Title: Jewish Home of San Francisco
302 Silver Avenue
Zoning: Residential – House, Two Family (RH-2)
50-X Height and Bulk District (50-X)
Block/Lot: 5952/002
Lot Size: 377,447 square feet
Project Sponsor: Jewish Home of San Francisco
Daniel Ruth, druth@jewishseniorlivinggroup.org
Lead Agency: San Francisco Planning Department
Staff Contact: Michael Jacinto – (415) 575-9033
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PROJECT DESCRIPTION

The proposed project would involve the demolition of the existing Main Building (including West and Infirmary Wings) on the Jewish Home campus and construction of two new buildings up to 78 feet tall containing a total of 210 “Residential Care Facility for the Elderly” (assisted living and memory care) ~~dwelling~~ units, as well as retail and support spaces. Four other existing buildings on the site would remain. The new buildings would front on Mission Street and Avalon Avenue, and a new vehicular entry court would be constructed from a proposed new driveway on Avalon Avenue at London Street. The project would also include implementation of medical care, wellness and other programs for a range of older adults—both Jewish Home residents and others—and their caregivers on a central location in the Jewish Home campus referred to hereafter as “The Square.” The Square would occupy a total of 45,100 square feet of space within existing and proposed buildings. On-site parking spaces would increase from the existing 166 to 224, and would be accommodated in an underground parking garage beneath the new buildings and in the existing at grade on-campus parking spaces. Vehicle access to the Jewish Home campus would be from both the Avalon Entry Court noted above and the existing Silver Avenue entrance; the existing Mission Street vehicle exit would be removed. The new buildings would provide new pedestrian access from Mission Street.

The project would require Planning Commission approval of a Conditional Use/Planned Unit Development, Special Use District, an increase in the height limit from 50 feet to up to 80 feet on a portion of the site to accommodate the new buildings, a General Plan Bulk amendment and a *General Plan* referral, among other approvals. These could constitute the Planning Department project approval actions under Chapter 31 of the *San Francisco Administrative Code*.

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, starting on page 147.

INITIAL STUDY

Jewish Home of San Francisco
302 Silver Avenue
Planning Department Case No. 2011.1323E

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Glossary

Acute Care Psychiatric Hospital Facility: An acute psychiatric hospital facility is a health facility that is licensed to provide acute inpatient service for senior patients who are suffering from acute emotional and psychological problems. These facilities aim to restore the overall quality of daily life for the patient and caregiver.

Age in Place: The Centers for Disease Control define “age in place” as the ability to live in one’s own home and community safely, independently, and comfortably, regardless of age, income, or ability level. In this document, “age in place” refers to this ability, but under a continuing care model (see definition below).

Assisted Living (AL): A Residential Care for the Elderly (RCFE) licensed living option that provides for a full range of personal support services that are assessed to meet the needs of elderly with chronic functional disabilities, but who are still capable of maintaining their own living space with support assistance. An Assisted Living facility provides living space, congregate dining, social lounges, recreation and education spaces, laundry facilities and a secure barrier free environment. When other support services are required they are called in to provide support based on individual need, See RCFE definition below.

Clinic: An outpatient facility where patients are treated.

Continuing Care: A type of community where aging care needs—such as assisted living, independent living, and nursing home care—are provided within a single residence, whether in a congregate housing facility, assisted living facility, or a skilled nursing home.

Friedman Pavilion: This building is at the corner of Silver Avenue and Lisbon Street. It houses 120 SNF beds clustered around three nursing stations.

Goodman Building: A cruciform (in the shape of an X) five-story-over basement building, located directly southeast of the Main Building, currently housing 176 SNF beds, support facilities, a physical rehabilitation area and a small ground level café and gift shop.

Koret Center: This building is attached to the eastern wing of the Goodman Building via a wide corridor, and houses 78 SNF including acute psychiatric care beds. Due to the slope of the site, the Koret Center is two stories on the east side and three stories on the west.

Last Mile: The “last mile” is used in both freight and transit planning to describe the final connection between a distribution link or hub (such as a train station) and the final destination.

Long-Term Care: A facility that provides rehabilitative, restorative, and/or ongoing skilled nursing care to patients or residents in need of assistance with activities of daily living.

Main Building: This building serves as the main entry lobby for the Jewish Home and faces northwest towards the intersection of Mission Street and Silver Avenue. The Main Building includes a West wing,

and an Infirmary wing. The central pavilion of the Main Building contains the Jewish Home's reception area, Board of Directors meeting rooms, a family lounge, and volunteer and administrative offices. The three-story west wing and two-story Infirmary wing contain 83 SNF units, which are vacant, as discussed below. The building hosts monthly Board of Directors meetings.

Medi-Cal: Medi-Cal is California's Medicaid program. It is a public health insurance program which provides needed health care services for low-income individuals including families with children, seniors, persons with disabilities, those in foster care, pregnant women, and low income people with specific diseases such as tuberculosis, breast cancer or HIV/AIDs.

Medicare: A federal insurance program covering hospitals, skilled nursing and physician-related costs incurred by 1) most citizens over 65 years old, 2) the physically disabled for two years or longer and 3) certain citizens needing treatment for end of stage renal disease.

Memory Care (MC): An RCFE licensed assisted living option designed to support memory for those with mild and moderate memory loss. Personal care and supervised activity-oriented living will be provided. See RCFE definition below.

Residential Care Facility for the Elderly (RCFE): RCFE licensing requirements are overseen by the California Department of Social Services and are governed by the *Health and Safety Code*. RCFEs must provide their occupants with a wide range of care and services that go far beyond any amenities or services available in a typical housing development. As a condition of licensure, RCFEs must provide residents with basic services such as personal assistance and care, regular observation of physical, mental, emotional and social functioning, supervision, planned activities, food service, and arrangements for obtaining incidental medical and dental care. The regulations impose additional duties on RCFEs to take action in the event residents' care needs change and they are no longer appropriately placed. RCFEs are also subject to special fire code provisions that are not required for unlicensed housing. By way of example, a wood frame building of over three floors cannot be licensed as an RCFE and a nonambulatory person cannot reside above the second floor of a wood frame licensed RCFE building. There are also extensive fire resistance, sprinklering, smoke door and exit requirements that require very specialized expertise to interpret and implement. The physical plant is also inspected by the Department of Social Services for compliance with safety and sanitation regulations such as food preparation, storage of medications, and water and air temperature settings. RCFEs are exempt from rent control under *Health and Safety Code* Section 1569.147(b).

Rosenberg Family Center: This two-story building (plus a basement level kitchen) flanks the eastern side of the Main Building and houses the central kitchen, the medical clinic, arts classrooms, and a synagogue on the first level, and research facilities, administration offices, and meeting rooms on the second floor.

Short Stay Rehabilitation: Short-term rehabilitation facilities provide therapy for individuals recovering from a surgery, illness or accident. Generally, those needing short-term, in-patient rehabilitation may remain involved in their program at a facility for as little as a couple of days to as many as several weeks. Short-term rehabilitation programs help patients achieve their maximum functional capacity and get back to their homes and community in the shortest time possible. To achieve this goal, patients receive

physical, occupational and speech therapy from compassionate and highly skilled therapists. Therapists are part of a team that includes physicians, nurses, social workers and nutritionists, who work with the patient and family members to develop an individualized care plan.

Skilled Nursing Facility (SNF): An institution or part of an institution that meets criteria for accreditation established by the sections of the Social Security Act that determine the basis for Medicaid and Medicare reimbursement for skilled nursing care. Skilled nursing care includes 24-hour nonacute nursing, medical and rehabilitative care.

The Square: A “one-stop” center for seniors living on and off The Jewish Home campus, and for their families and caregivers, that will meet many medical, wellness, social, cultural, nutritional, fitness, and recreational needs and interests, and make for a vibrant, life-enhancing, and connected community. The Square is an integral part of the RCFE use that allows seniors to receive personal care and participate in supervised, activity-oriented living and to enable resident seniors to interact with other seniors in the community.

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INITIAL STUDY

Jewish Home of San Francisco
302 Silver Avenue
Planning Department Case No. 2011.1323E

A. PROJECT DESCRIPTION

Project Overview

The Jewish Home of San Francisco (Jewish Home or Home) is located at 302 Silver Avenue at Mission Street, at the northern edge of San Francisco's Excelsior District (see **Figure 1**). The 9-acre project site is located in a primarily residential neighborhood, with some commercial uses on Mission Street. Existing facilities, shown in **Figure 2**, house a mix of uses, including skilled nursing facilities (SNF)¹ (short-term stay/rehabilitation and long-term skilled nursing), acute care psychiatric hospital, and support facilities, including clinic space. The proposed project would entail retention of the SNF, demolition of one building, and construction of two residential care buildings, both licensed as Residential Care Facility for the Elderly (RCFE).² Four other existing buildings (Goodman, Koret, Friedman, and Rosenberg) would remain. The project would include the potential expansion of the existing acute care psychiatric hospital facilities by approximately 5,000-6,000 square feet. The Jewish Home would also partner with other service providers to develop and operate "The Square." The Square would be a central location on the Jewish Home Campus for service, support, and community for a wide range of older adults—including both Jewish Home residents and others—and their caregivers. The Square would potentially expand on the scope of existing clinic and support services at the Jewish Home, and would make them available to the broader community. The project would also include a retail component at the corner of Mission Street and Avalon Avenue and up to approximately 58 net new parking spaces on-site.

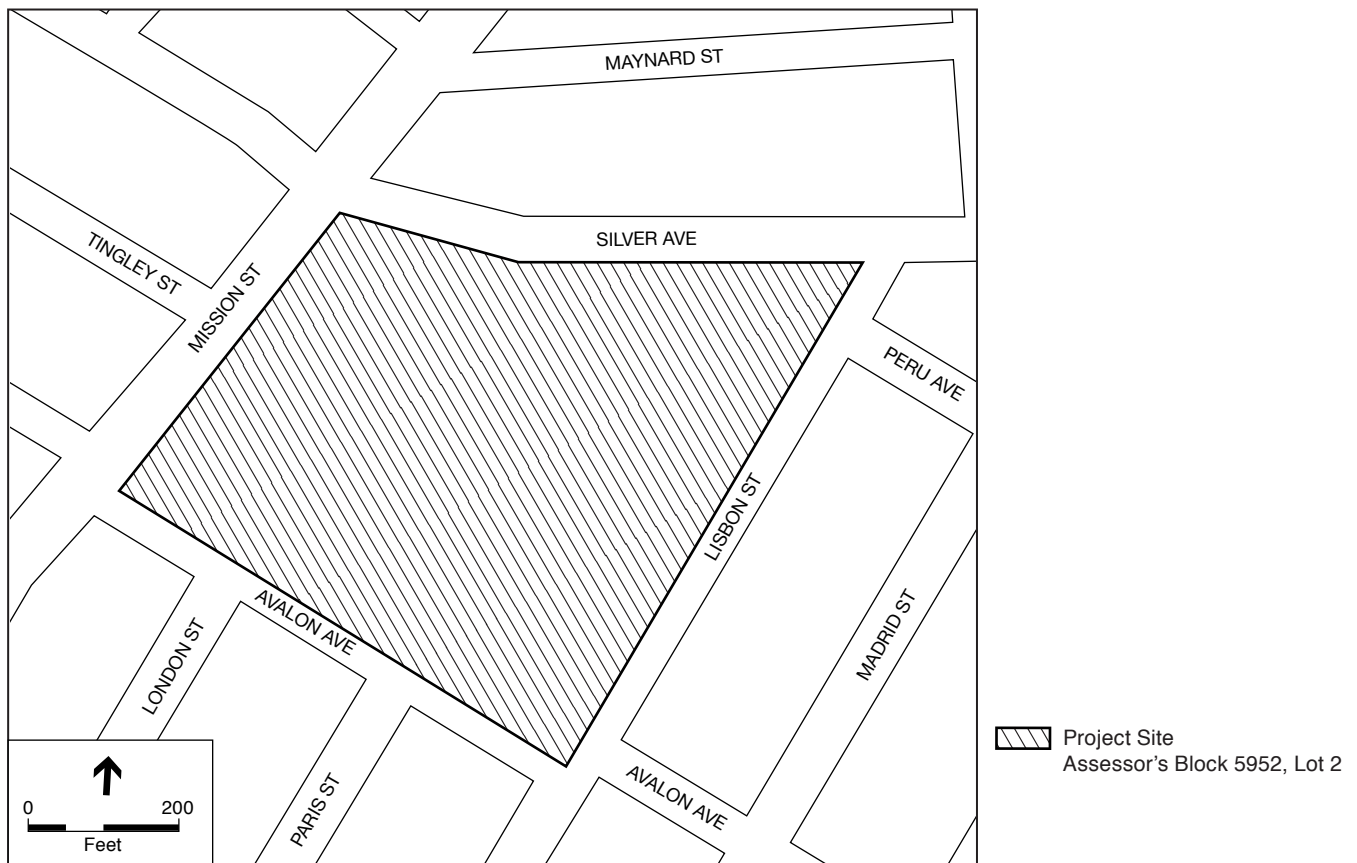
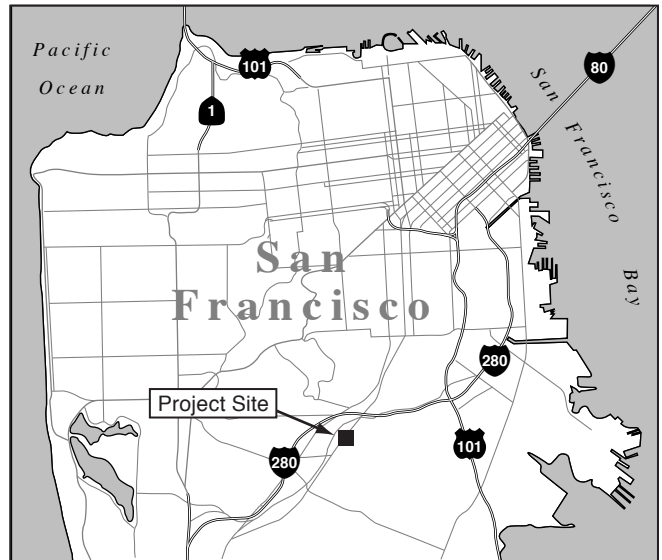
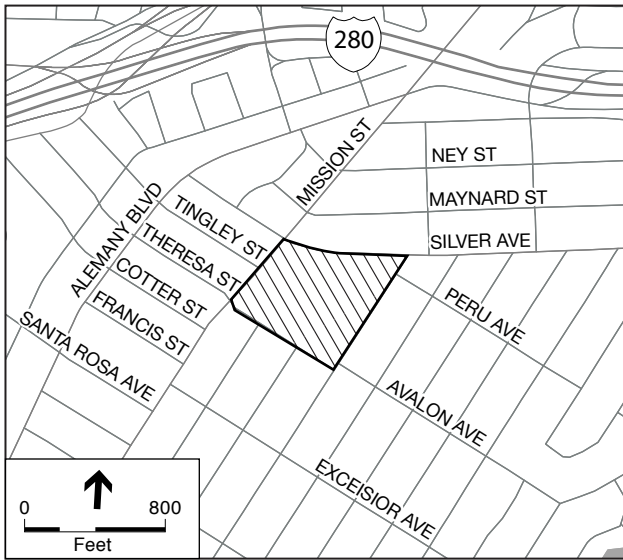
Need for the Project

The Jewish Home is a residential care facility,³ established in 1871, that specializes in programs, services and care for older adults. The Jewish Home is operated by a 501(c)(3) non-profit corporation, and its mission is to enhance the quality of life for seniors. The Jewish Home is dedicated to providing access to many different populations with multiple and unique care and service needs and at various income levels. The Jewish Home has historically relied on substantial philanthropy to support its operations and will continue to do so with the project.

¹ SNF beds are licensed by the California Department of Public Health, while RCFE beds are licensed by the state Department of Social Services, Community Care Licensing Division. The Department of Social Services website notes that RCFE facilities "provide care, supervision and assistance with activities of daily living, such as bathing and grooming" (<http://www.cclid.ca.gov/PG543.htm>; accessed April 25, 2014).

² RCFE consists of both assisted-living residential units and "memory care" units; the latter are assisted living units that provide additional supervision for persons with Alzheimer's disease and related conditions.

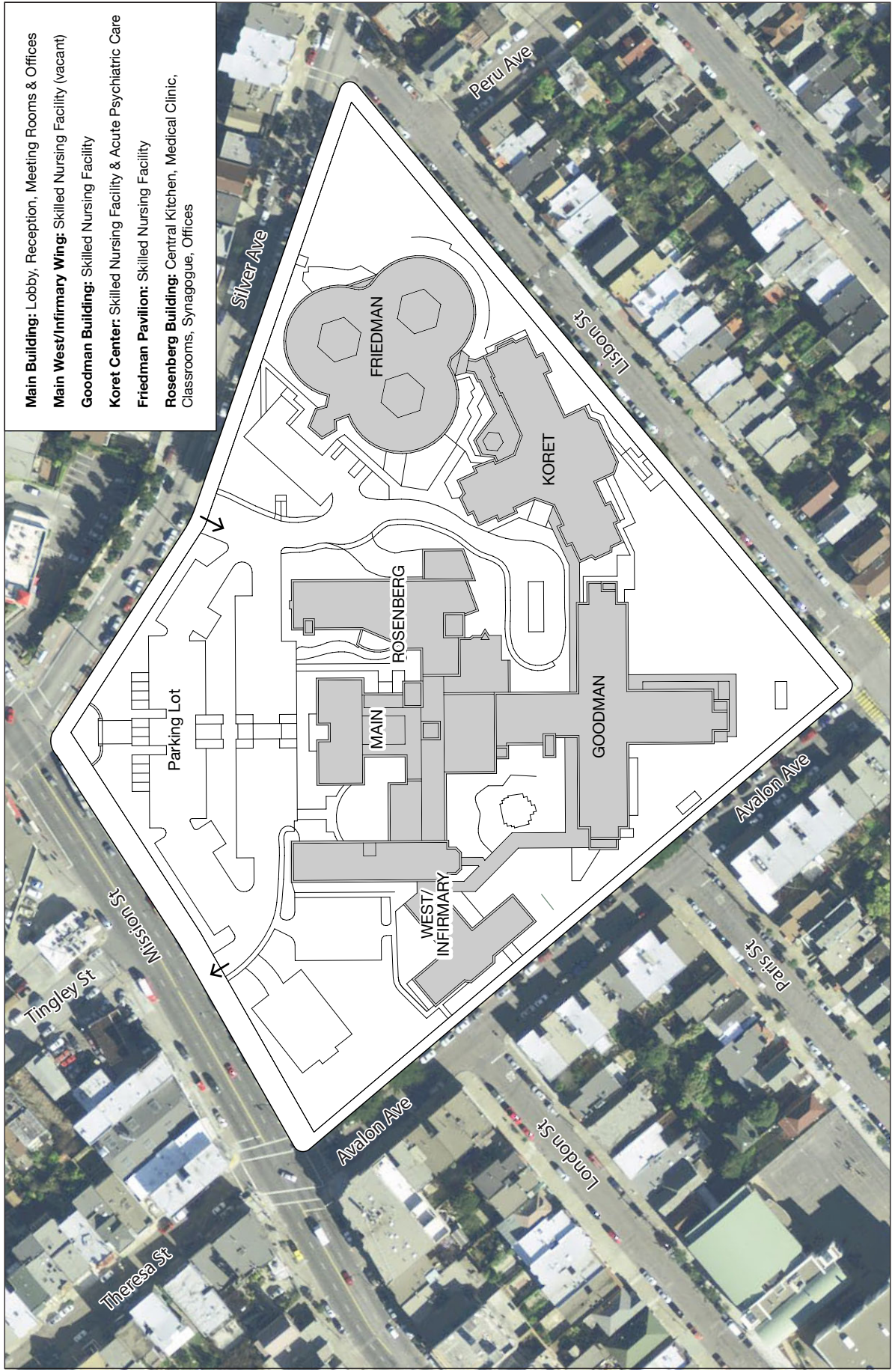
³ Planning Code Section ~~209.1~~ 102 "Residential Care Facility".



SOURCES: ESA; San Francisco Planning Department

Case No. 2011.1323E: Jewish Home of San Francisco

Figure 1
Project Location



Case No. 2011.1323E: Jewish Home of San Francisco
Figure 2
 Existing Conditions

SOURCES: Ankrom Moisan; Van Meter Williams Pollack

According to the project sponsor, among the most pressing issues in long-term care is the inconsistent and unreliable approach to Medi-Cal reimbursement based on the financial condition of the State of California. This state of affairs has resulted in fluctuating operating deficits for the Jewish Home, which undermines the long term sustainability of the organization. The Home, along with other residential care facilities and senior care service providers, faces changes as more Baby Boomers⁴ reach retirement age, bringing new demands, expectations, and concerns about the rest of their lives. This trend presents the following challenges:

- Thanks to modern medicine, people are living longer—but often with multiple chronic illnesses, including dementia and Alzheimer’s, which can take a toll on individual lives, families, and communities.
- Many adults are ill-prepared financially for retirement and wonder how they will afford the longer lives medicine makes possible.
- Older adults today prefer independence to the traditional institutional living approaches of the past, but remaining at home can lead to isolation, premature illness, depression, and poor access to life-enhancing resources. Often, couples must separate when one’s need for care outpaces the other’s need. Seniors fortunate enough to have a support system risk draining the financial, emotional, and physical resources of their caregivers.
- Public resources for residential care facilities are dwindling, and recent state funding cuts to Medi-Cal reimbursement created substantial liabilities for facilities like the Jewish Home. Many residential care facilities, including the Jewish Home, are aging and outdated, and it will be a major undertaking at a substantial cost to renovate and rebuild the facilities to contemporary residential care, life safety and seismic standards.

To address the above challenges, the project would:

- Develop a modern residential care facility that serves a broader spectrum of the senior population in a diversity of settings. The project would entail construction of facilities to allow people to age in place as long as possible, with the ability to vary the types and level of care that residents receive over time.
- Shift the existing Jewish Home from a predominantly SNF to a combination SNF and RCFE model, serving a range from more able seniors, to frail elderly, to those with memory care needs. RCFE facilities and services are licensed and monitored by the State of California.⁵ In RCFE facilities, there is a substantial “care” component--and the “residential” and “care” components are inseparable. The licensing triggers a panoply of special requirements related to the physical space and service requirements. Among other things, RCFE facilities must be built to a special construction typology, designed to standards for occupants with reduced mobility, and inspected by the Department of Social Services (DSS) for compliance with safety and sanitary regulations. The licensing also mandates a baseline level of services, including personal assistance and care; regular observation of physical, mental, emotional and social functioning; supervision; planned activities; food service; and arrangements for obtaining incidental medical and dental care.

⁴ Those born in the years 1945–1963.

⁵ The licensed SNF beds and acute care psychiatric beds at the Jewish Home are licensed under Health and Safety Code Section 1250 et seq.

- Enhance the Home’s existing services for residents, and make many of them available to other, non-resident seniors as part of the RCFE through The Square. A total of 45,100 square feet of space on the Jewish Home Campus would be used by Square service providers for medical care and wellness programs. Approximately 7,500 square feet of space on the second floor of the Rosenberg Family Center, described below and shown in Figure 2, would be dedicated to the Square. The remaining 37,600 square feet of space would be shared space, comprising existing clinic and other space on the first floor of the Rosenberg Building, with the balance in other buildings to be developed for the new RCFE population. It would also include services such as, but not limited to, adult day,⁶ social programs, education and entertainment, a café, potentially a site-serving pharmacy and other retail uses, and other resources.

Project Location and Existing Site Characteristics

Existing Site Characteristics

As noted above, the approximately 9-acre irregularly-shaped project site⁷ is located at 302 Silver Avenue (Assessor’s Block 5952, Lot 2), in the Excelsior District of San Francisco. The Jewish Home campus is bounded by Mission Street to the west, Lisbon Street to the east, Silver Avenue to the north and Avalon Avenue to the south.⁸ The existing Jewish Home facility occupies the entire block. The project site slopes upward from northwest to southeast at a grade of up to about 8 percent, from an elevation of 148 feet, San Francisco Datum (SFD), at Silver Avenue and Mission Street to 213 feet, SFD, at the intersection of Avalon Avenue and Lisbon Street.⁹ The project site is located in a RH-2 (Residential-House, Two-Family) use district, and within a 50-X (50-foot high limit, no bulk limit) height and bulk district.

Existing Buildings

Currently, the site is occupied by five buildings: Main, Goodman, Koret, Friedman, and Rosenberg buildings, as follows (see Figure 2):

- The **Main Building**, initially constructed in 1923, serves as the main entry lobby for the Jewish Home and faces northwest towards the intersection of Mission Street and Silver Avenue. The Main Building includes a West wing, also built in 1923 (the original East Wing has been demolished), and an Infirmary wing, constructed in 1931. The 28-foot-tall, two-story central pavilion of the Main Building contains the Jewish Home’s reception area, Board of Directors meeting rooms, a family lounge, and volunteer and administrative offices. The 38-foot-tall, three-story west wing and two-story Infirmary wing contain 83 SNF units, which are vacant, as discussed below. The building hosts monthly Board of Directors meetings.

⁶ The use of the adult day facilities may include, without limitation, programs designed to serve those with early onset memory loss (which are not licensed).

⁷ “Project site” as used in this document includes the entirety of the Jewish Home of San Francisco property. A substantial portion of the site will not be directly affected by physical changes proposed under the project, which involves no demolition or new construction in the northeastern part of the site.

⁸ The project site is located in an area of the City where three distinct street grids meet. Two of those street grids are offset from cardinal directions. For purposes of this analysis, Mission Street, Lisbon Street, and other streets parallel are described as running north-south. Silver Avenue, Avalon Avenue, and other streets parallel are described as running east-west.

⁹ SFD, or San Francisco City Datum, establishes the City’s zero point for surveying purposes at approximately 8 feet above mean sea level. The actual ground elevation of the project site along Lisbon Street is several feet below the street, somewhat reducing the site’s actual slope.

- The **Goodman Building**, constructed in 1969, is a cruciform (in the shape of an X) 50- to 63-foot-tall (five-story-over basement) building, located directly southeast of the Main Building, currently housing 176 SNF beds, administrative support facilities, a physical rehabilitation area, a gift store and a small ground level café and gift shop. Due to the topography of the campus, there are five stories above-ground on the building's northern side and four stories aboveground on the building's southern side.
- The 49-foot-tall (3-story) **Koret Center**, constructed in 1984, is attached to the eastern wing of the Goodman Building via a wide corridor, and houses 78 SNF including acute psychiatric care beds. Due to the slope of the site, the Koret Center is two stories on the east side and three stories on the west.
- The 46-foot-tall (three-story) **Friedman Pavilion**, constructed in 1995 near the corner of Silver Avenue and Lisbon Street, has 120 SNF beds clustered around three nursing stations.
- The **Rosenberg Family Center** was constructed in 2006 at the former location of the Main Building's East Wing. The approximately 36-foot-tall (two-story) Rosenberg building (with a below-grade kitchen) flanks the eastern side of the Main Building and houses the central kitchen at the basement level, a medical clinic, an arts classroom, and a synagogue on the first level, and research facilities, administration offices, and meeting rooms on the second floor.

The site's existing use is a residential care facility, which pursuant to *Planning Code* Section 209.1 is "a facility specializing in programs, services and care for older adults." The Jewish Home predates the existing *Planning Code* land use controls, which were adopted in 1960. The project site was purchased in 1872 by the Pacific Hebrew Orphan Asylum and Home Society, whose mission was to "found and maintain an Asylum for orphan children" and to "establish and support a Home for aged and infirm Israelites";¹⁰ a Victorian building was constructed in 1891 and initially served 12 elderly residents.¹¹ The current Jewish Home operations were permitted through Conditional Use (CU) authorization and Planned Unit Development granted in 1991 (Case No. 90.362EC) and amended in 2003 (Case No. 2002.0447C).

The existing residential care facility use includes both short-term and long-term SNF beds and acute care psychiatric beds, as well as a site-serving clinic and other supportive and accessory uses. The Jewish Home had 457 beds licensed by the California Department of Public Health (445 SNF beds and 12 acute psychiatric care beds); however, under existing conditions, 83 SNF beds, located in two wings of the Main Building,¹² are vacant (having been recently vacated in light of inadequate building conditions and anticipated upgrades), meaning that the number of existing occupied beds is 374.^{13,14} The campus

¹⁰ Jewish Home website: "History of Jewish Home of San Francisco," <http://jhsf.org/about-history.htm>. Retrieved April 18, 2014.

¹¹ At the time, the Society's orphanage was at Divisadero and Hayes Streets.

¹² For purposes of environmental review, the Main Building includes the central pavilion and the extant three-story west wing of that building, both of which were constructed in 1923 (with the exception of the 1945 third-story addition to the west wing), as well as the Infirmary wing, added in 1931.

¹³ 374 occupied units is considered the baseline for analysis in this Initial Study.

¹⁴ Some SNF residents of the Goodman Building are temporarily living in the Main Building during fire sprinkler upgrades to the Goodman Building. Once these residents return to Goodman, the units in Main will again be vacant.

employs an average of 509 workers and volunteers on weekdays. The site includes 166 off-street surface parking spaces and three off-street loading spaces.

The architectural character of the campus is eclectic and diverse, although a few design characteristics and materials tie the campus together. The 1923 Main Building—including the West wing and the 1931 Infirmary wing—is a steel-frame, brick-clad structure in the Georgian Revival style of architecture. The 1969 Goodman Building is in the Brutalist style, of exposed concrete accented with brick. The three newest buildings (Koret, Friedman, and Rosenberg) reflect the traditional masonry cladding on the site, albeit with pre-cast brick panels. Contemporary glazing is used on the Friedman and Rosenberg buildings; the Friedman Pavilion, in particular, limits brick to accents amid large expanses of glass and concrete.

In 2008, the Jewish Home commissioned a team of engineers to evaluate all site structures for the Home's internal use. The evaluation focused on the mechanical systems as well as the seismic capabilities of the existing buildings. The engineers concluded that the skilled nursing wings of West and Infirmary (both of which are part of the Main Building) had reached the end of their useful lives. According to the project sponsor, the life safety and mechanical systems require complete replacement and the Main Building would require a sprinkler system (which does not exist) to comply with applicable life-safety building requirements. Further, the steel and brick clad structures, designed just after the turn of the century, were deemed to be seismically challenged.

"Quality of life" of the facilities' spaces was not a category evaluated. However, the design of these skilled nursing wards is narrow in dimension, providing limited sunlight, and the resident rooms are small. The quality of the spaces is not up to contemporary style for similar facilities. In short, the physical constraints of the wards' design make it impractical to renovate the spaces into a contemporary nursing facility designed to support and enhance the lives of seniors. From 2013 through 2014, the West and Infirmary wings were vacated. Under the proposed project, they would remain dormant until their demolition, with the exception of temporary occupancy of some units by SNF residents of the Goodman Building during rehabilitation of the fire sprinkler system in that building.

Campus Landscaping and Parking

As shown in Figure 2, the campus contains an at-grade, terraced parking area north of the Main and Rosenberg buildings. The lot is served by two sets of concrete steps leading to the Main Building. (The stairs are remnants of the Main Building's original processional entry that led from the intersection of Silver and Mission.) The lower set of stairs is lined by four concrete piers with decorative iron posts and original concrete decorative urns. A courtyard with a statue and water feature is located between the Main and Goodman buildings. The site is densely planted with groves of mature trees along Avalon Avenue and Lisbon Street.

On-site parking comprises of three surface parking lots that include a total of 166 parking spaces, including 8 ADA-compliant accessible spaces. There is a parking lot located in the northwest portion of the campus (located immediately west of the Silver Avenue driveway entrance) that contains 82 regular parking spaces, 5 accessible spaces, and 10 tandem parking spaces (totaling 20 spaces) for private vans owned and operated

by the Jewish Home of San Francisco. There are 16 parking spaces, plus 3 accessible spaces, located in front of the Friedman Building, 2 parking spaces located near the Goodman Building drop-off area, and two parking lots with 38 spaces near the West Building. The larger parking lot in the northwest portion of the campus is available for visitors, volunteers, and employees of the facility; however, the other three parking lots are controlled by permits and dedicated to employees and volunteers (i.e., not for use by the general public).

Existing vehicular access is provided via a through drive with ingress off of Silver Avenue and egress onto Mission Street. The Silver Avenue/Mission Street intersection is also a transit hub for several Muni lines running along Mission Street and Silver Avenue, including the 14-Mission, 14R Mission Rapid, 14X-Mission Express, 49-Van Ness/Mission, and 52-Excelsior lines, which run along Mission Street, and the 44-O'Shaughnessy line, which runs along Silver Avenue. The entire site is surrounded by a low concrete wall surmounted by a decorative metal fence; pedestrian access is available only via walkways alongside the two driveways.

Project Characteristics

Project Components

Demolition

As noted above, the approximately 50,600-square-foot Main Building, including its West and Infirmary wings, would be demolished as part of the project. The building's central pavilion contains conference/meeting rooms. The three-story west wing contains 60 SNF beds (currently vacant) on the second and third floors, with support facilities on the ground floor. The infirmary wing is two stories, and contains 23 SNF units (also currently vacant).¹⁵

The two parking lots adjacent to the West and Infirmary wings comprise a total of 38 spaces, as well as some vegetation, that would also be removed to accommodate the new construction. In addition, the project would remove 82 trees. Of the trees to be removed there are 41 under 12" in diameter, 17 of 12" to 18" diameter, 5 of 20" to 36" diameter, and 19 multi-stem. Trees removed would primarily comprise saplings, multi-stem and young trees around the Main Building and Infirmary and West Wings, as well as some of the trees near the corner of Mission Street and Avalon Avenue, where the two new buildings would be constructed. It is estimated that three of the large cypress trees at this location would be retained. Finally, to accommodate the two new buildings, the project would remove and replant existing shrubbery that currently surrounds a decorative fountain adjacent to the northwest quadrant of the Goodman Building's cruciform shape. The fountain, designed by noted landscape architect Lawrence Halprin, would not be affected.

¹⁵ As noted, some units are temporarily occupied by SNF residents of the Goodman Building, but this does not increase the overall occupancy of the facility.

New Construction

Two new structures would be built in the southwest quadrant of the project site. One structure (Building 1B) would be a rectangular-shaped building developed at the corner of Mission Street and Avalon Avenue. Another building (Building 1A) would be an irregular-shaped building connecting to the existing Rosenberg and Goodman Buildings. It would wrap around the Halprin Fountain and connect to Building 1B, with facades along both Mission Street and Avalon Avenue. A common Entry Court from Avalon Avenue opposite London Street would serve the two buildings. **Figure 3** presents the proposed site plan.

The new buildings would house licensed RCFE units (which, as described below, would provide greater flexibility in the type of care that may be provided). The RCFE units would be used in a “Continuing Care” model, with residents able to “age in place,” and, when needed, to receive even more care. There is also the potential for the number of existing acute psychiatric care hospital beds in the Koret Building to be increased; however, any such change would result in a concomitant decrease in SNF beds and would not affect the facility’s overall population or staffing. With implementation of the proposed project, the number of Jewish Home residents would be approximately 619, compared to approximately 374 residents currently at the Home.¹⁶ **Table 1** summarizes the proposed project characteristics.

Most of Building 1A would be 5 to 6 stories (approximately 53 feet above grade, as shown in **Figure 4**). Due to the slope of the project site, the Avalon Avenue wing would be 3 stories above street grade at the intersection of Avalon Avenue and London Street, rising to 4 stories as the building extends toward the east (an average roof height above grade of about 39 feet), and the building would reach a maximum height of 7 stories (75 feet) at its northern and westernmost point, set back from Mission Street. The building would have parking, circulation, support, and administrative and support service areas in the podium and a partial basement level, as well as 140 RCFE units on Floors 2 through 6. Building 1B would be a six-story, approximately 64-foot-tall, rectangular structure with frontages on both Mission Street and Avalon Avenue. The ground and terrace levels would contain parking, circulation, retail, administration support, and common areas. Floors 3 through 6 would contain 50 RCFE units.

Buildings 1A and 1B would include approximately 6,000 gsf of space along the Mission Street frontage that would be designed in a “storefront” style with transparent facades, ceiling heights and other features that activate the street. Of this 6,000 gsf, the Home would devote 1,800 gsf located at the corner of Mission Street and Avalon Avenue to retail use, and 1,400 gsf located adjacent to the plaza across from Tingley Street for administrative space or RCFE or RCFE Support uses. The remaining 2,800 gsf of space would be “flex use,” depending on market demand. If economically feasible, it would be devoted to retail use.¹⁷ If determined not to be economically feasible, it would be devoted to administrative or other RCFE or RCFE support uses.

¹⁶ The current license from DPH is for 478 skilled nursing beds and 13 acute psych beds, but the Home is applying to reduce the number of licensed beds commencing 5/1/15.

¹⁷ This analysis assumes that the space would be retail use.



SOURCES: Ankrom Moisan; Van Meter Williams Pollack

Case No. 2011.1323E: Jewish Home of San Francisco

Figure 3

Proposed Site Plan

**TABLE 1
PROJECT CHARACTERISTICS**

Building	Building Square Feet ¹					On-Site Parking Spaces ²	Units/Beds	Residents	Uses
	Residential	Support	Admin Support / Retail	Day Care	Structured Parking ²				
Existing to Remain									
Rosenberg	--	42,450	--	--	--	166	--	--	Administration; medical, wellness, education services offered as part of the Square; synagogue; kitchen
Friedman	80,450	24,700	--	--			120	120	Skilled nursing and rehabilitation areas
Koret	33,400	16,700	--	--			78	78	Skilled nursing including acute psychiatric
Goodman	77,400	21,050	--	--			176	176	Skilled nursing, rehabilitation, and café
Existing to Be Demolished									
Main (include West and Infirmary Wings) ³	50,560	--	--	--	see above	Approx. 73 spaces to be removed	83 (licensed) 0 (occupied)	N/A	Skilled nursing building to be removed
Proposed									
1A	105,000	50,400	6,212 ⁴	3,250	43,550	72	155	177 ⁵	
1B	42,060	3,200	4,679 ⁴	--	6,700	59	55	68 ⁵	
Total with Project	287,750	158,500	10,891	3,250	50,250	224 ⁶	584	619	--
Net New	96,500	53,600	10,891	3,250	50,250	58	210	245	--

NOTES:

¹ Totals are approximate due to rounding

² Parking for existing buildings is surface parking; the number of spaces is not allocated to individual buildings, so it is shown in total.

³ The square footage for Main/West/Infirmary is shown as residential, although a portion of this square footage is also admin/support space.

⁴ This analysis assumes that up to 4,600 square feet of the admin support / retail space in Buildings 1A and 1B would be retail use.

⁵ Proposed buildings would contain units/beds for more than one person. On average, the buildings would have approximately 1.16 residents per unit.

⁶ As under existing conditions, up to an additional 50 spaces would be available through valet parking for special events (in the surface parking lot and/or the underground garage).

SOURCE: Jewish Home of San Francisco, January 2015



SOURCES: Ankrom Moisan; Van Meter Williams Pollack

NOTES: Existing building heights are approximate.
Ground elevation ranges from 148 feet at Mission Street and Silver Avenue to 216 feet at Avalon Avenue and Lisbon Street.

Case No. 2011.1323E: Jewish Home of San Francisco

Figure 4

Building Heights Above Grade

Each building would have a mechanical penthouse that would extend approximately 10 feet above a portion of the roof. As described below under “Approvals Required,” below, the project sponsor has submitted an application for a Zoning Map amendment, which would include modifying the height limit to allow for buildings up to 65 feet tall as the predominant height for the new RCFE buildings, with a small portion of Building 1A permitted up to 80 feet.¹⁸ The project would also require an amendment to the General Plan Urban Design Element, Map 5 (Bulk Guidelines).

Residential Care for the Elderly

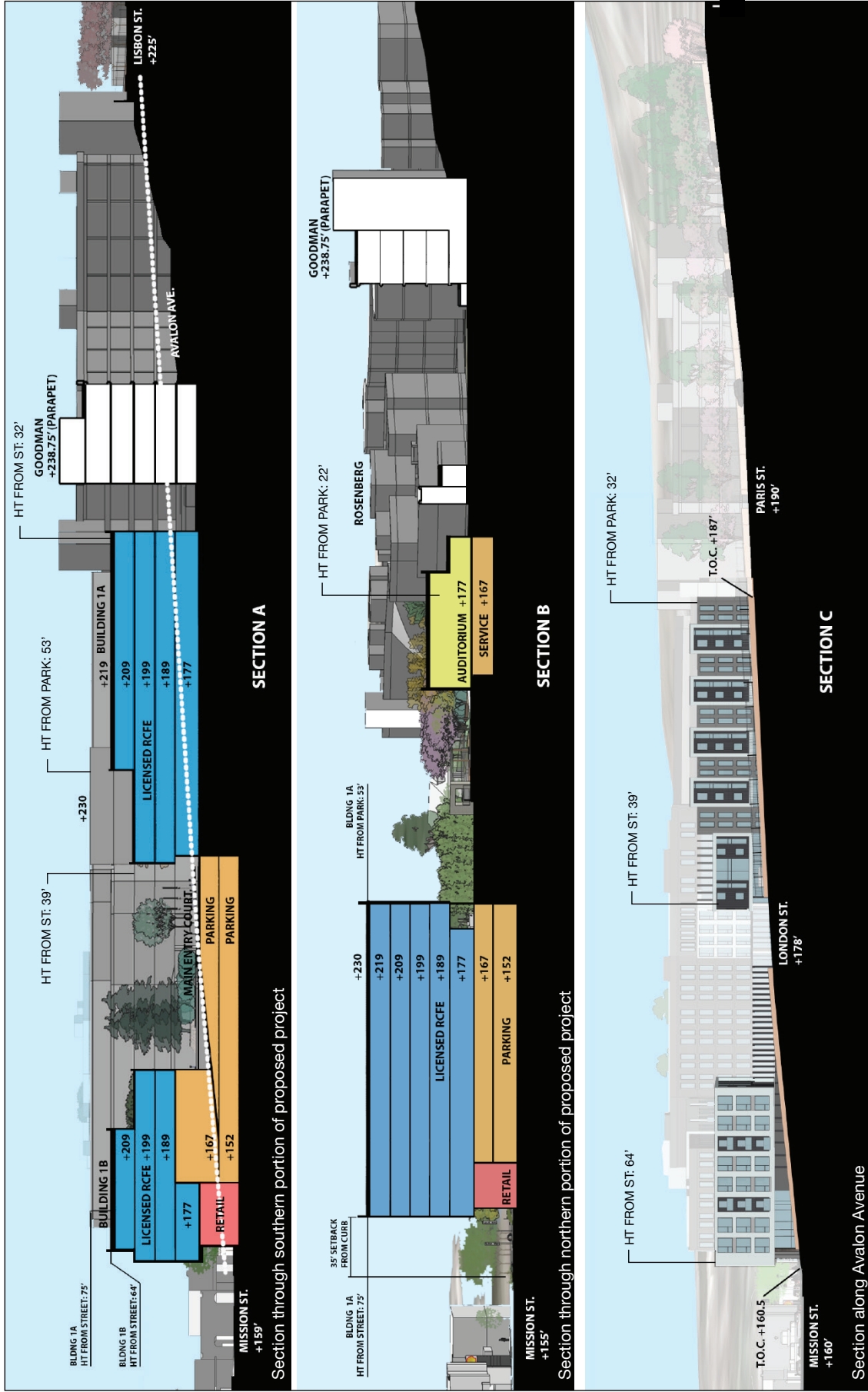
The California Department of Social Services (DSS), which implements the California *Health and Safety Code*, licenses RCFE facilities. As a condition of licensure, DSS requires that RCFEs provide residents with basic services such as personal assistance and care, regular observation of physical, mental emotional and social functioning, supervision, planned activities, food service, and arrangements for obtaining incidental medical and dental care. Accordingly, all RCFE residents would be provided with communal dining. In addition, residents of the new RCFE units would be offered services including transportation to appointments and shopping; a wide range of recreational, physical, spiritual and intellectual programming; health monitoring; assistance with activities of daily living provided by nursing staff; medication assistance; housekeeping services; and maintenance.

Together, the two new buildings would encompass approximately 264,984 square feet of building area, including below-grade parking (further discussed below). Cross-sections of the project are shown in **Figures 5** and **6**, and a site perspective is shown in **Figure 7**. The proposed buildings would be constructed on a shallow grade beam or mat foundation system. The project would require excavation to an elevation of 147 feet SFD, or a maximum depth of about 25 feet below existing grade and would necessitate the removal of approximately 19,500 cubic yards of soil, as well as existing foundations and basement beneath the Main Building. The buildings would be served by a backup emergency generator.

The Square

RCFEs may also include various support facilities to assist with their mission of allowing seniors to age in place and to ensure the long-term viability of the facilities. The Jewish Home has historically included these uses, including acute care psychiatric hospital, clinic and other personal and social services. As part of the project, the Jewish Home would enhance those services for residents, and make many of them available to other seniors as part of the RCFE through The Square, which would be a location on site where these services would be provided. A total of 45,100 square feet of space (space which is already included within space allocated for SNF and RCFE facilities) will be used by Square members for medical care and wellness programs. As shown in **Figure 8**, 7,500 square feet of space on the second floor of the Rosenberg Building would be dedicated to The Square. Existing art classroom uses would be relocated to Building 1A, and the remainder of spaces for existing uses—including offices, synagogue, meetings rooms, and research

¹⁸ The current design indicates that the taller portion of Building 1A would be approximately 75 feet above street level. To provide for a conservative analysis, this document analyzes the environmental effects of a building constructed up to the 80-foot height limit.



SOURCES: Ankrom Moisan; Van Meter Williams Pollack

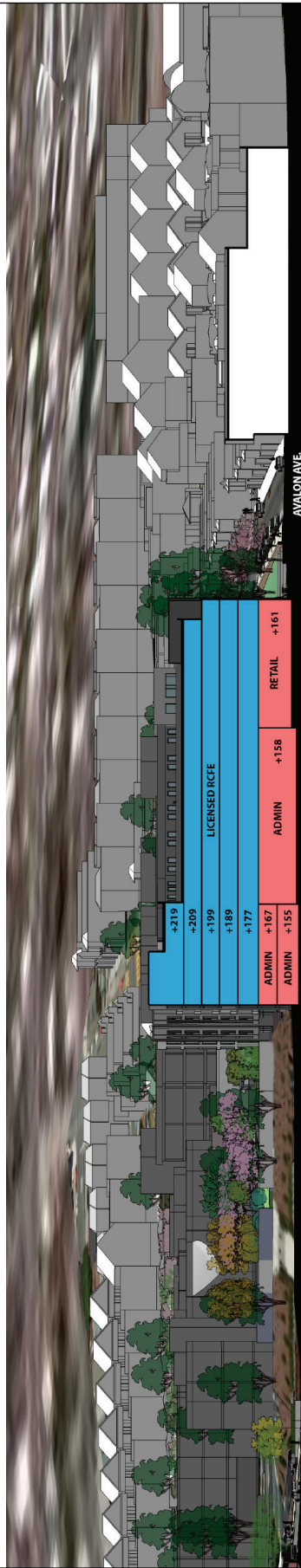
Case No. 2011.1329E: Jewish Home of San Francisco

Figure 5
Cross-Sections



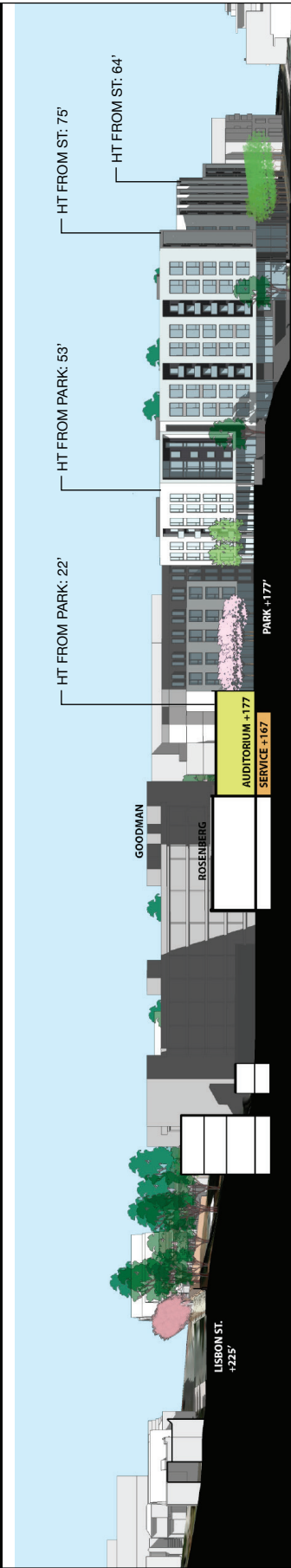
Section through eastern portion of proposed project

SECTION D



Section through western portion of proposed project

SECTION E



Section through northern portion of proposed project

SECTION F

SOURCES: Ankrom Moisan; Van Meter Williams Pollack

Case No. 2011.1329E: Jewish Home of San Francisco
Figure 6
 Cross-Sections



View of Avalon Avenue and Entrance Court Looking North



Aerial View Over Mission Street Looking South to Avalon Avenue

SOURCES: Ankrom Moisan; Van Meter Williams Pollack

Case No. 2011.1323E: Jewish Home of San Francisco

Figure 7
Site Perspective

laboratory—would continue or be combined with new Square uses in the building. The remaining 37,600 square feet of space would be shared space, comprising existing clinic and other space on the first floor of the Rosenberg Building, with the balance in other buildings to be developed for the new RCFE population. The Square could also house services such as, but not limited to, adult day programming, social programs, education and entertainment, a café, potentially a site-serving pharmacy and other retail uses, and other resources. It is expected to serve approximately 200 visitors from the City, in addition to Jewish Home residents and adult day may serve up to an additional 25 non-residents. As described under “Approvals Required,” below, the project sponsor has submitted an application for a Special Use District (SUD) that is intended to update the *Planning Code’s* definition of “residential care facility” for the project site. The current definition does not specify that residential care facility support uses would be available to the broader community.¹⁹

It is anticipated that approximately 50 percent of seniors using the facilities of The Square would be brought to the Jewish Home by shuttle van service, such as is currently operated by the Jewish Home and by a number of other independent senior service providers in San Francisco.²⁰ About 10 percent independent seniors would also be expected to drive themselves to the Home; 25 percent would be brought by family members, friends, taxi; and 15 percent would travel to the site via public transportation. Although hours of operation have not been definitively established, it is likely that The Square would operate throughout the day and also offer some evening hours for the convenience of seniors’ family members who are not available during the day. Daily operations could run from approximately 9:00 a.m. to 4:00 p.m. once fully operational.²¹ The majority of The Square users would arrive between 9:00 a.m. and 11:30 a.m. Users of The Square would be dropped off at a circular vehicular drop off zone to be developed near the existing Rosenberg pedestrian entrance. This vehicular drop off zone would be accessed from the existing Silver Avenue entrance and surface parking area (discussed below).

Parking, Site Circulation, and Access

The project would increase the on-site parking supply from the existing 166 spaces to 224 spaces (a net increase of 58 spaces). Of the 224 parking spaces, approximately 93 spaces would be in a surface parking lot, and approximate 131 spaces would be in structured parking (59 spaces and 72 spaces on the above-described parking levels P1 and P2, respectively, beneath Buildings 1A and 1B). Parking spaces would comprise a combination of independently-accessible, tandem, and mechanically-assisted and enhanced spaces (e.g., stacking lifts and puzzle parking mechanisms). Valet service would be provided to assist with the use of mechanically-assisted parking devices and to manage the tandem spaces noted above.

¹⁹ The San Francisco Planning Code, Section 201, defines “residential care facility” as a facility providing lodging, board and care for a period of 24 hours or more to persons in need of specialized aid by personnel licensed by the State of California. Such facilities shall include but not necessarily be limited to a board and care home, family care home, long-term nursery, orphanage, rest home or home for the treatment of addictive, contagious or other diseases or psychological disorders.

²⁰ These assumptions form the basis for a Transportation Demand Management study prepared by Fehr and Peers. A copy of this study is available for public review under Case No. 2011.1323E at the San Francisco Planning Department, 1650 Mission Street.

²¹ To provide a conservative analysis, the IS/MND assumes that a portion of The Square users would leave the site after 4:00 p.m., during the p.m. peak hour.



Building	Location of the Square:	Size
Rosenberg:	Level 1:	10,900 sf
	Level 2:	7,500 sf
Building 1A, Level 1:	Commons Core:	9,400 sf
	Fitness/Wellness:	11,600 sf
Goodman, Level 1:	Central Group Space:	1,500 sf
	Rehab (not shown):	4,200 sf

Valet service also would be provided to accommodate the parking demand during major events at the Jewish Home such as Board Meetings and holiday events; up to an additional 50 spaces could be available through the valet parking (in the surface parking lot and/or underground parking garage).

Once completed, vehicles and pedestrians would access the Jewish Home campus from both the Avalon Avenue curb cut noted above and the existing Silver Avenue curb cut. The existing Mission Street exit would be removed. As shown in **Figure 9**, the 59 spaces of structured parking immediately beneath Building 1B would only be accessible from Avalon Avenue, and the remainder of the spaces on the project site would only be accessible via Silver Avenue, as would the loading dock at the Rosenberg Building and the loading dock at the Friedman building. The project sponsor has not yet determined if the two parking levels would be connected with an internal ramp. Contingent upon endorsement by immediate neighbors and approval by the San Francisco Municipal Transportation Agency (SFMTA), the project sponsor also proposes conversion of parallel parking to diagonal parking at the eastern edge of the Home's campus on Lisbon Street. This conversion, which would move the existing curb-line approximately 3 feet into the existing sidewalk area, would result in a net increase of 10 to 15 new spaces on Lisbon Street. These net new spaces would be offset by two articulating bus zones on Mission Street, as well as the new curb cut across from London Street. Therefore, the project would result in a net increase of about 2 on-street spaces.

The Jewish Home proposes to include a Transportation Demand Management (TDM) program as part of the project to address mobility and circulation that include elements such as "last mile" shuttles, transit fare subsidies, priced parking, bike facilities, on-site car share, on-site services, a TDM concierge and carpool matching assistance for off-site users of The Square and for employees and volunteers at the Home.

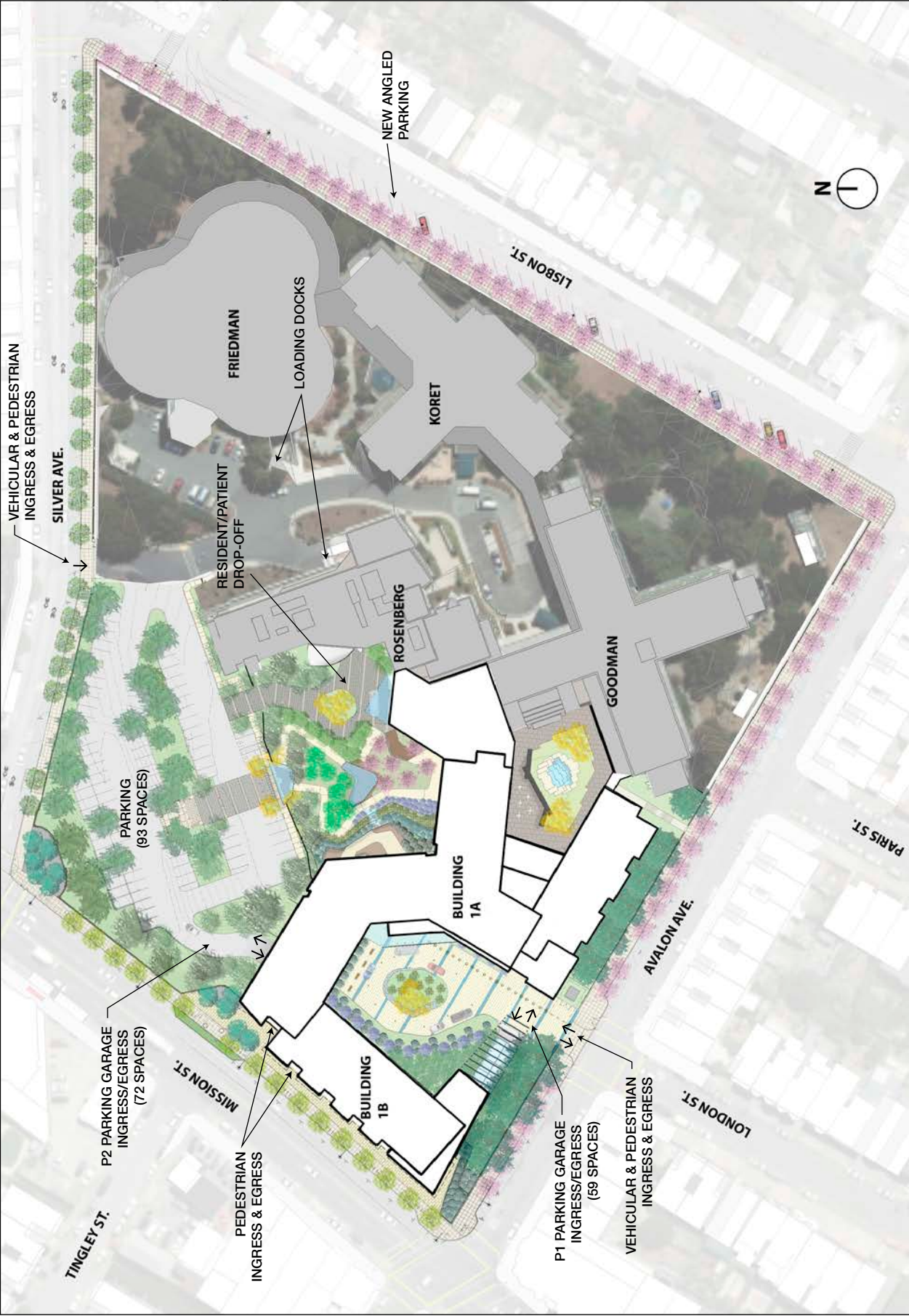
Landscaping and Streetscape

Proposed streetscape improvements/changes include the following:

Mission Street: The existing width of sidewalks on Mission Street adjacent to the project site is approximately 12 feet, measuring from the curb face to property line. The sidewalks in front of the Jewish Home property at Mission Street and a portion of Avalon Avenue to the new RCFE building auto entry at London Street would be altered. The sidewalk fronting the new RCFE structure would be widened from the Tingley plaza area to a new plaza to be formed where Mission Street meets Avalon Avenue (Avalon plaza area). The sidewalk in this area would be widened by approximately 10 feet six inches. The extended sidewalk would include landscaped areas. The width of the entire sidewalk in this zone would be approximately 22 feet six inches.

Along Mission Street, new hardscape would be constructed from the property line to the new building frontage. Mid-block along Mission Street, at Tingley Street, a planted curb extension and small plaza are proposed. The plaza would contain trees and hardscape, and the entry to the Jewish Home's administrative offices would be located adjacent to this area.

The project sponsor also proposes a loading (yellow) zone of approximately 25 feet by 8 feet to serve the proposed retail space on Mission Street at Avalon Avenue. This loading space would be subject to SFMTA approval.



SOURCES: Ankom Moisan; Van Meter Williams Pollack

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Figure 9

Circulation Diagram

The sidewalk at the Tingley plaza area would be increased by six feet to accommodate a curb extension, which would be expanded into the parking lane. The portion of the Mission Street frontage north of the plaza (between Tingley Street and Silver Avenue) would remain in its existing condition and width (12 feet). The existing wall and fence would be retained. At the corner of Mission Street and Silver Avenue, there would be minor improvements, including tree planting and new lighting. The existing wall would be retained, and new softscape, lighting and paving would be added at the semicircular area defined by the northwest corner of the Jewish Home property.

Silver Avenue: Along Silver Avenue, no changes are proposed (i.e., the existing entrance, wall and fence would be retained). The widths of the existing 10-foot-wide sidewalk would not be modified.

Lisbon Street: Parking along Lisbon Street would be reconfigured from parallel to diagonal on-street parking.

Avalon Avenue: The project would include installation of new landscaping along the Avalon Avenue frontage, between the new buildings and the street, as well as along the new Avalon Avenue driveway. The specific plantings and landscaping design have not been determined. (Building 1B would be constructed to the property line along Mission Street, consistent with City guidelines and to provide access from the sidewalk to the new retail space.)

Along the Avalon Avenue frontage at the intersection of London Street, a new curb cut would be constructed for the proposed site access (replacing the curb cut that would be eliminated along Mission Street). A new paved bulbout would be constructed at the corner adjacent to the proposed retail space. As the sidewalk turns the corner from Mission Street to Avalon Avenue, the Avalon plaza area would be developed by expanding the sidewalk level on private property to the south of the RCFE building.

The sidewalk width along Avalon Avenue which is approximately 12 feet would not be altered except that curb extensions would be constructed on both sides of the new entry to the RCFE at the London Street intersection.

As part of the improvements described above, the existing Muni bus stop on Mission Street at Silver Avenue would be incorporated into the new plan consistent with San Francisco Metropolitan Transportation Agency (SFMTA) requirements of the Transit Effectiveness Project (TEP).

The curb cuts, extensions, bulbout, loading zone, and Lisbon Street parking changes would require San Francisco Department of Public Works (SFPD) approval. The Lisbon Street parking changes would also require SFMTA approval. Also, Board of Supervisors approval would be required for any sidewalk/street width changes associated with the Lisbon Street parking changes.

Additional landscaping would occur within the interior of the project site, in much of the area currently occupied by the existing central pavilion of the Main Building.

Employment

The project would result in a net increase of 135 on-site employees and volunteers, from 509 to 644.

Construction Schedule

The two buildings would be constructed as a single phase, along with the interior renovations to the Rosenberg Building for The Square. It is anticipated that demolition of the Main Building and southerly parking lots would commence in spring 2016 and new construction would begin in summer 2016; occupancy of the completed project is projected for the second quarter of 2018.

Approvals Required

The proposed project would require the following approvals (by the designated authorities):

San Francisco Planning Commission

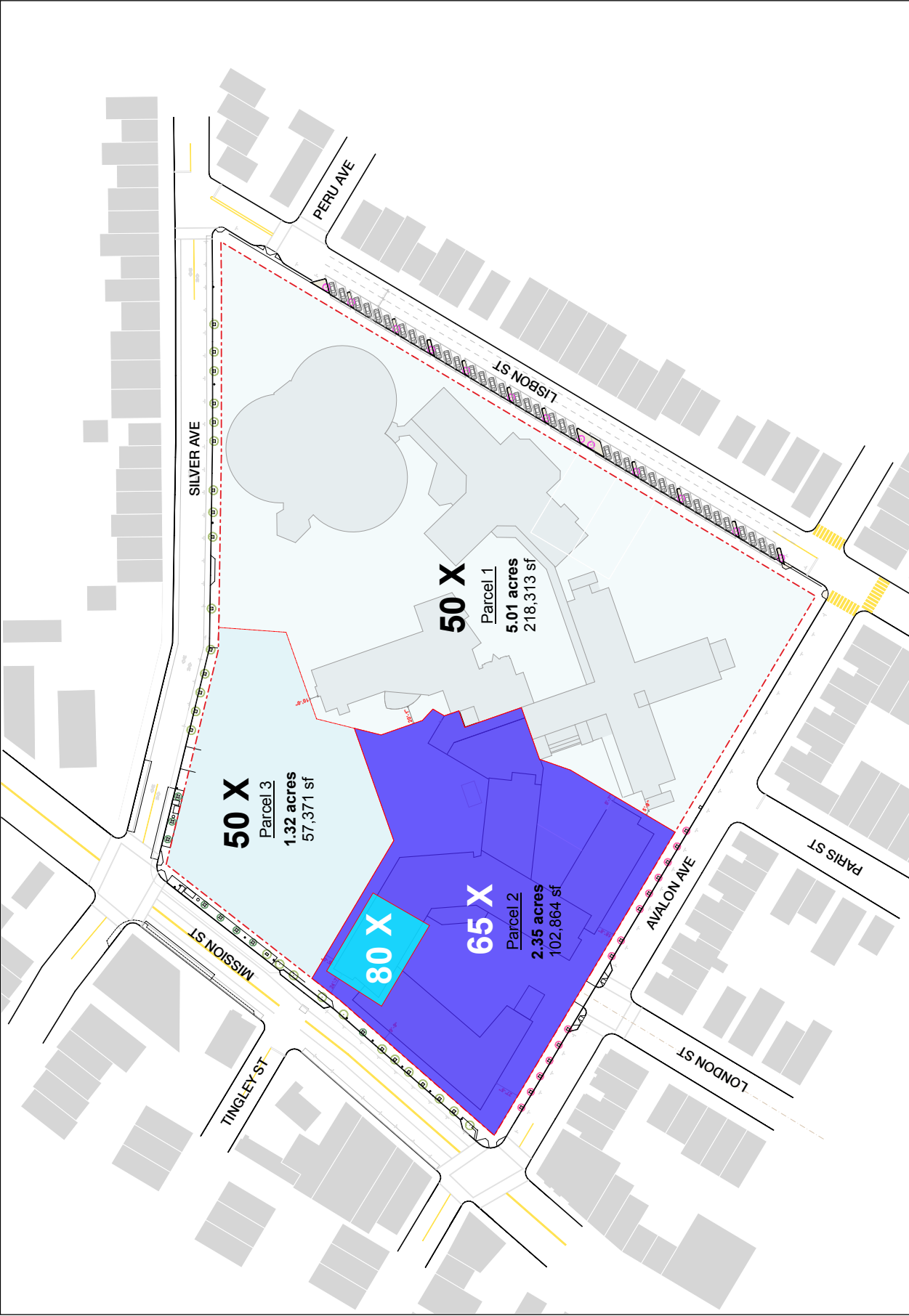
- Recommendation to Board of Supervisors for a rezoning of the entire campus that would create a Special Use District (SUD) to update the *Planning Code* definition of “residential care facility” applicable within the SUD, including to reflect contemporary standards for licensed RCFE facilities, incorporate The Square and specify authorized non-residential uses, and modify other *Planning Code* provisions as necessary.
- Recommendation to Board of Supervisors of a Zoning Map amendment to map a 65-X Height and Bulk District across Buildings 1A and 1B, as well as a 80-X Height and Bulk District over the portion of Building 1A adjacent to Mission Street, as shown in **Figure 10**.
- A Conditional Use / Planned Unit Development authorization under the *Planning Code* for the expanded residential care facility, pursuant to *Planning Code* Section 209.1.
- A *General Plan* Referral (Section 2A.53 of the *Administrative Code*) for various sidewalk changes.
- Recommendation to Board of Supervisors regarding amendment of General Plan Urban Design Element, Map 5 (Bulk Guidelines).

San Francisco Board of Supervisors

- Rezoning of the entire campus that would create a Special Use District (SUD) to update the *Planning Code* definition of “residential care facility,” applicable within the SUD, including to reflect contemporary standards for licensed RCFE facilities, incorporate The Square and specify authorized non-residential uses, and modify other *Planning Code* provisions as necessary.
- Amendment to map a 65-X Height and Bulk District across Buildings 1A and 1B, as well as an 80-X Height and Bulk District over the portion of Building 1A adjacent to Mission Street.
- Approval of Lisbon Street sidewalk/street width changes.
- Approval of an amendment of General Plan Urban Design Element, Map 5 (Bulk Guidelines).

San Francisco Department of Building Inspection

- Review and approval of building and demolition permits.
- San Francisco Public Utilities Commission
- Review and approval of the stormwater management system to meet the SFPUC Stormwater Design Guidelines.



SOURCES: Ankrom Moisan; Van Meter Williams Pollack

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Figure 10

Special Use District Height Map

- Review and approval of an Erosion and Sediment Control Plan in accordance with Article 4.1 of the *San Francisco Public Works Code* for construction activities.
- A Batch Wastewater Discharge Permit approval in accordance with Article 4.1 of the *San Francisco Public Works Code* for discharges of groundwater during dewatering.

San Francisco Municipal Transportation Authority

- Approval of curb cuts, extensions, bulbout, loading zone, and Lisbon Street parking changes.

San Francisco Department of Public Works

- Approval of any necessary construction permits for work within roadways.
- Subdivision of the lot into 3 parcels, including the area of new construction over Buildings 1A and 1B, the area of the existing buildings to remain, and the area of the parking lot at the northern portion of the campus.
- Approval of curb cuts, extensions, bulbout, loading zone, and Lisbon Street parking changes.

San Francisco Department of Building Inspection

- Approval of site/building permit(s).

Bay Area Air Quality Management District

- Approval of a permit for the proposed backup emergency generator.

California Department of Social Services

- The proposed RCFE uses would be reviewed by the California Department of Social Services (DSS) Community Care Licensing Division to determine whether the project meets the licensing requirements of the *California Health and Safety Code* and *California Code of Regulations*.

B. PROJECT SETTING

The project site is located in the Excelsior District of San Francisco, approximately one-quarter mile south and east of Interstate Highway 280 and approximately one long block (about 650 feet) east and south of Alemany Boulevard. The Glen Park BART Station is located about 0.35 miles northwest of the Home, and John McLaren Park is approximately 0.4 miles to the southeast of the Home. The project site is surrounded on three sides (Silver and Avalon Avenues, Lisbon Street) by predominantly single-family residential uses, most of which are two stories (approximately 20 to 30 feet) in height. Nearby uses on Mission Street are varied, and include commercial, residential, and mixed-use buildings, community services, and a house of worship. The Mio Preschool is located directly south of the project site along Mission Street, and the Filipino Community Center is located 3 blocks to the south, on Mission Street at Persia Avenue. Government and community facilities are located in close proximity to the site. The San Francisco Public Library Excelsior Branch is located half a block south of the project site, on the west side of Mission Street between Francis Street and Cotter Street. Monroe Elementary School is located half a block south of the project site, on the east side of Lisbon Street and north of Excelsior Avenue. The

San Francisco Community Alternative School is also located half a block south of the site, between Paris Street and London Street, north of Excelsior Avenue.

C. COMPATIBILITY WITH EXISTING ZONING AND PLANS

	<i>Applicable</i>	<i>Not Applicable</i>
Discuss any variances, special authorizations, or changes proposed to the <i>Planning Code</i> or Zoning Map, if applicable.	☒	☐
Discuss any conflicts with any adopted plans and goals of the City or Region, if applicable.	☒	☐
Discuss any approvals and/or permits from City departments other than the Planning Department or the Department of Building Inspection, or from Regional, State, or Federal Agencies.	☒	☐

San Francisco Planning Code

The San Francisco *Planning Code* (*Planning Code*) incorporates the San Francisco Zoning Maps and governs permitted uses, densities, and configuration of buildings within San Francisco. Permits to construct new buildings (or to alter or demolish existing ones) may not be issued unless the proposed project either conforms to the *Planning Code* or is granted an exception pursuant to provisions of the *Planning Code*.

The project site is located in a RH-2 (Residential, House; Two-Family) District. RH-2 Districts are described in Section 206.1 of the *Planning Code* and are typified by one-family and two-family houses. Structures are finely scaled and usually do not exceed 30 feet in width or 40 feet in height. Building styles are often more varied than in single-family areas, but certain streets and tracts are quite uniform. Ground-level open space (in the form of rear yards) is normally available, and it frequently is private for each unit. In some cases, group housing and institutions are found in these areas, although nonresidential uses are generally limited. The RH-2 District in which the project site is situated only extends over the project site (surrounding districts are predominantly RH-1 and NC-3).

The proposed project would entail demolition of the Main Building (including West and Infirmary wings) and construct two new buildings in its place for continuation of the similar uses as currently exist on the project site. The project would also entail expansion of certain services and make various uses available to non-residents through The Square. The project sponsor has requested a Special Use District (SUD) overlay to update the *Planning Code* definition of “residential care facility” applicable to the project site. This updated definition would reflect contemporary standards for RCFE facilities and incorporate The Square. The project sponsor has also requested a Conditional Use / Planned Unit Development authorization under the *Planning Code* for the expanded residential care facility, pursuant to *Planning Code* Section 209.1.

The project site is located in a 50-X Height and Bulk District, which permits maximum heights of 50 feet with no diagonal bulk controls. The 50-X Height and Bulk District also covers only the project site; a 40-X district predominates throughout the project site vicinity. The project as proposed would exceed the

50-foot height limit. As stated in the Project Description and shown in Figure 5, due to the slope of the project site, the buildings would range from 3 and 4 stories (approximately 32 and 39 feet) above Avalon Avenue to 7 stories (80 feet) above Mission Street at Tingley Street. As shown in Figure 10, the project sponsor has requested a Zoning Map amendment to designate the area encompassing Buildings 1A and 1B as a 65-X Height and Bulk District, and 80-X Height and Bulk District on the tallest building, which allow for maximum heights of 65 feet and 80 feet, respectively, with no diagonal bulk controls.

San Francisco General Plan

The *San Francisco General Plan* (General Plan) provides general policies and objectives to guide land use decisions. The General Plan contains 10 elements (Commerce and Industry, Recreation and Open Space, Housing, Community Facilities, Urban Design, Environmental Protection, Transportation, Air Quality, Community Safety, and Arts) that set forth goals, policies, and objectives for the physical development of the City. The proposed project would not obviously or substantially conflict with any General Plan goals, policies, or objectives. The compatibility of the proposed project with the General Plan goals, policies, and objectives that do not relate to physical and environmental issues will be considered by decision-makers as part of their assessment whether to approve or disapprove the proposed project. Any potential conflicts identified as part of that process would not alter the physical environmental effects of the project.

The project would not obviously conflict with the General Plan. Housing Element Objective 4 calls for the City to foster a housing stock that meets the needs of all residents across lifecycles, including the elderly. Policy 4.2 states that the City should provide a range of housing options for residents with special needs for housing support and services, including RCFE facilities. Policy 4.2 directs the City to create accessible housing for aging adults. Similarly, Community Facilities Element Objective 3 states that the City should assure that neighborhood residents have access to needed services and a focus for neighborhood activities, including health care, senior citizen programs, and adult education and enrichment programs. Policies 3.5, 3.6 and 3.7 state that the City should prioritize development of neighborhood and care centers based on relative accessibility and need.

Map 4 of the General Plan Urban Design Element, Urban Design Element for the Height of Buildings, calls for buildings between 41 and 88 feet tall along Mission Street. Map 5 of the General Plan Urban Design Element, Urban Design Guidelines for the bulk of buildings, includes maximum plan and diagonal dimensions for the bulk of buildings along Mission Street taller than 40 feet. The project would require an amendment to the General Plan Urban Design Element, Map 5 (Bulk Guidelines).

On balance, the proposed project's setback and diagonal dimensions do not appear to substantially conflict with General Plan provisions. As stated above, the proposed project would require a *General Plan* Referral from the San Francisco Planning Commission. Decision makers would consider General Plan conformity as part of project approvals.

The Accountable Planning Initiative

In November 1986, the voters of San Francisco approved Proposition M, the *Accountable Planning Initiative*, which added Section 101.1 to the *Planning Code* to establish the following eight priority policies:

- Preservation and enhancement of neighborhood-serving retail uses;
- Protection of neighborhood character (see Section E.1, Land Use and Land Use Planning, Question 1c);
- Preservation and enhancement of affordable housing (see Section E.2, Population and Housing, Question 2b, with regard to housing supply and displacement issues);
- Discouragement of commuter automobiles (see Section E.4, Transportation and Circulation, Questions 4a, 4b, and 4f);
- Protection of industrial and service land uses from commercial office development and enhancement of resident employment and business ownership (see Section E.1, Land Use and Land Use Planning, Question 1c);
- Maximization of earthquake preparedness (see Section E.13, Geology and Soils, Questions 13a through 13d);
- Landmark and historic building preservation (see Section E.3, Cultural and Paleontological Resources, Question 3a); and
- Protection of open space (see Section E.8, Wind and Shadow, Questions 8a and 8b; and Question 9, Recreation, Questions 9a and 9c).

Prior to issuing a permit for any project that requires an Initial Study under the California Environmental Quality Act (CEQA), or issuing a permit for any demolition, conversion, or change of use, and prior to taking any action that requires a finding of consistency with the General Plan, the City is required to find that the proposed project would be consistent with these priority policies. Consistency with policies applicable to the proposed project is discussed in Section E (specific subsections are noted in parentheses in the priority policies listed above).

The project would not conform to the site's existing 50-X height and bulk district. Potential conflicts of Priority Policies are addressed in Section E.1, Land Use. The project is otherwise not anticipated to conflict with the Accountable Planning Initiative. The project's case report and approval motions will contain the Planning Department's comprehensive analysis and findings regarding consistency of the proposed project with the Priority Policies and other *General Plan* policies and *Planning Code* requirements.

Other Local Plans

Health Care Services Master Plan

In 2010, the San Francisco Board of Supervisors required the creation of a Health Care Services Master Plan (HCSMP) to "provide the Health Commission, the Planning Commission and Board of Supervisors with information and public policy recommendations to guide their decisions to promote the City's land use and policy goals developed in such Plan, such as distribution and access to health care services." The Ordinance created *Planning Code* Sections 342 through 342.10 to create and implement the HCSMP. The Planning Department and the Department of Public Health (DPH), with extensive community involvement, completed the HCSMP, which was adopted by the Board of Supervisors and signed by the Mayor in December 2013. The HCSMP provides extensive community health data; identifies the current and projected needs for health care services in San Francisco; and makes recommendations on how to

achieve and maintain an appropriate distribution of health care services in the city. The Planning Department, in conjunction with DPH, must determine whether certain medical use projects, including the proposed project, align with the HCSMP by making a “Consistency Determination” recommendation, which is forwarded to the San Francisco Health Commission for adoption.

In December 2014, the San Francisco Health Commission adopted Resolution No. 14-16, recommending an HCSMP Consistency Determination for the proposed project. This determination is based on the project’s consistency with several guidelines of HCSMP Recommendation 3.1: Increase access to appropriate care for San Francisco’s vulnerable populations. The resolution indicates that the project is considered Consistent and Recommended for Incentives. These incentives will be determined through coordination with the Planning Department. The project was found consistent with HCSMP, and therefore no conflicts are anticipated.

San Francisco Better Streets Plan

The *Better Streets Plan* focuses on creating a positive pedestrian environment through measures such as careful streetscape design and traffic calming measures to increase pedestrian safety. The Better Streets Plan includes guidelines for the pedestrian environment, which it defines as the areas of the street where people walk, sit, shop, play, or interact. Generally speaking, the guidelines are for design of sidewalks and crosswalks; however, in some cases, the *Better Streets Plan* includes guidelines for certain areas of the roadway, particularly at intersections.

The plan identifies Mission Street as a Commercial Throughway, which are streets designed to move significant volumes of people across town in a variety of modes of travel, as well as attract people to patronize businesses and amenities along the corridor. They should have a comfortable pedestrian realm with significant pedestrian amenities and public spaces.

The plan designates other streets surrounding the project site as Neighborhood Residential streets, which are quieter residential streets with relatively low traffic volumes and speeds.

The project would include a publicly accessible private open space along Mission Street at approximately Tingley Street. This plaza would provide the neighborhood with a space for passive recreation. At the corner of Mission Street and Silver Avenue, there would be minor improvements, including tree planting and lighting. The existing wall would be retained, and new softscape and paving would be added at the semicircular area defined by the northwest corner of the Jewish Home property.

San Francisco Bicycle Plan

The *Bicycle Plan*, completed in 2009, describes a City program to provide the safe and attractive environment needed to promote bicycling as a transportation mode. The *Bicycle Plan* identifies the citywide bicycle route network, and establishes the level of treatment (i.e., Class I, Class II or Class III facility) on each route. The *Bicycle Plan* also identifies near-term improvements as well as policy goals, objectives and actions to support these improvements. It also includes long-term improvements, and minor improvements that would be implemented to facilitate bicycling in San Francisco.

In the project site vicinity, the *Bicycle Plan* identifies Silver Avenue as within the existing bicycle network. Bicycle Route 70 (Class III facility) runs along Silver Avenue between Alemany Boulevard and Oakdale Avenue. The bicycle routes connects to various routes including Route 45 (via Alemany Boulevard), Route 25 (via Bayshore Boulevard), and Route 170 (via Oakdale Avenue).

The 2009 plan and identifies Alemany Boulevard, from Rousseau Street to San Jose Avenue, for a near-term bicycle improvement project. This project was completed in 2011. Currently, Bicycle Route 45 (Class II facility) runs along Alemany Boulevard between San José Avenue and Silver Avenue. The Class II facility traverses along Alemany Boulevard from Silver Avenue to U.S. 101. The bicycle route provides connections to other routes, including Route 70 (via Silver Avenue), Route 25 (via Bayshore Boulevard), Route 84 (via Ocean Avenue), and Route 90 (via Geneva Avenue).

The proposed project would not affect the bicycle lanes on Silver Avenue or Alemany Boulevard. As stated under Topic 4, Transportation and Circulation, the project would not substantially affect current bicycle flow conditions, nor result in potentially hazardous bicycle conditions. The project would not conflict with the *Bicycle Plan*.

San Francisco Sustainability Plan Climate Action Plan

In 1993, the San Francisco Board of Supervisors established the Commission on San Francisco's Environment, charged with, among other things, drafting and implementing a plan for San Francisco's long-term environmental sustainability. The goal of the *San Francisco Sustainability Plan* is to enable the City and its people to meet their present needs without sacrificing the ability of future generations to meet their own needs.

The *Climate Action Plan for San Francisco: Local Actions to Reduce Greenhouse Emissions* is a local action plan that examines the causes of global climate change and human activities that contribute to global warming, provides projections of climate change impacts on California and San Francisco based on recent scientific reports, presents estimates of San Francisco's baseline greenhouse gas emissions inventory and reduction targets, and describes recommended actions for reducing the City and County's greenhouse gas emissions.

The proposed project is reviewed against the City's Greenhouse Gas Reduction Strategy under Section E.7, Greenhouse Gas Emissions. As explained there, this strategy documents the City's actions to pursue cleaner energy, energy conservation, alternative transportation and solid waste policies. Adherence to the strategy would ensure that the project would not conflict with the sustainability plan or climate action plan.

Regional Plans and Policies

The recently adopted *Plan Bay Area*, which includes the region's Sustainable Communities Strategy, is a collaboration led by the Association of Bay Area Governments (ABAG) and the Metropolitan Transportation Commission (MTC), in partnership with the Bay Area Air Quality Management District (BAAQMD) and the San Francisco Bay Conservation and Development Commission (BCDC). *Plan Bay Area*, adopted by ABAG and MTC in July 2013, is the region's first integrated land use and transportation plan, combining elements of ABAG's former *Projections* series of housing and employment growth forecasts and MTC's former stand-alone *Regional Transportation Plan*. The Plan calls for concentrating housing and job

growth around transit corridors, particularly within areas identified by local jurisdictions as Priority Development Areas (PDAs). *Plan Bay Area* also specifies strategies and investments to maintain, manage, and improve the region's multi-modal transportation network and proposes transportation projects and programs to be implemented with reasonably anticipated revenue. The Plan will be updated every four years. The project site, like much of eastern San Francisco, is within a PDA, where growth is anticipated and planned for in proximity to transit (see also the discussion on Population and Housing, below (Section E.2)). The proposed project would not conflict with any projects in the regional transportation plan. Therefore, the proposed project would be consistent with *Plan Bay Area*.

Other regional plans include:

- BAAQMD's *2010 Clean Air Plan* (2010 CAP), which is a road map that demonstrates how the San Francisco Bay Area will reduce emissions and decrease ambient concentration of harmful pollutants, achieve compliance with the state ozone standards and reduce the transport of ozone and ozone precursors to neighboring air basins. As described further in Section E.6, Air Quality, the proposed project includes applicable transportation and energy and climate control measures to reduce automobile trips and associated emissions and would not conflict with the 2010 CAP.
- BCDC's *San Francisco Bay Plan*, which guides the protection and use of the Bay and its shoreline and provides policy direction for BCDC's permit authority regarding various activities within its jurisdiction. The proposed project is not located within BCDC's jurisdiction and therefore would not conflict with the Bay Plan.
- The San Francisco Regional Water Quality Control Board's (RWQCB) *San Francisco Basin Plan* guides planning of the water basin. It designates beneficial uses and water quality objectives for waters of the State, including surface waters and groundwater. It also includes programs of implementation to achieve water quality objectives. As described further in Section E.14, Hydrology and Water Quality, the proposed project would not result in substantial water quality effects; thus the project would not conflict with the Basin Plan.

The project would not obviously or substantially conflict with any environmental plan or policy adopted for the purpose of avoiding an environmental effect.

D. SUMMARY OF ENVIRONMENTAL EFFECTS

The proposed project could potentially affect the environmental factor(s) checked below. The following pages present a more detailed checklist and discussion of each environmental factor.

☐ Land Use	☐ Greenhouse Gas Emissions	☐ Geology and Soils
☐ Population and Housing	☐ Wind and Shadow	☐ Hydrology and Water Quality
☒ Cultural and Paleo. Resources	☐ Recreation	☒ Hazards/Hazardous Materials
☒ Transportation and Circulation	☐ Utilities and Service Systems	☐ Mineral/Energy Resources
☒ Noise	☐ Public Services	☐ Agricultural and Forest Resources
☒ Air Quality	☐ Biological Resources	☐ Mandatory Findings of Significance

E. EVALUATION OF ENVIRONMENTAL EFFECTS

All items on the Initial Study Checklist that have been checked “Less than Significant Impact,” “No Impact” or “Not Applicable” indicate that, upon evaluation, staff has determined that the proposed project could not have a significant adverse environmental effect relating to that topic; for items checked “Less-than-Significant with Mitigation Incorporated,” no significant adverse environmental effect would ensue with the implementation of identified mitigation measure(s). A discussion is included for those issues checked “Less-than-Significant 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 “Not Applicable” or “No Impact” 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 Department, such as the Department’s *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. For each checklist item, the evaluation has considered the impacts of the proposed project both individually and cumulatively.

Senate Bill 743 and Public Resources Code Section 21099

On September 27, 2013, Governor Brown signed Senate Bill (SB) 743, which became effective on January 1, 2014.²² Among other provision, SB 743 amends the California Environmental Quality Act (CEQA) by adding *Public Resources Code* Section 21099 regarding analysis of aesthetics and parking impacts for urban infill projects.

Aesthetics and Parking Analysis

Public Resources Code Section 21099(d), effective January 1, 2014, provides that, “aesthetics and parking impacts of a residential, mixed- use residential, or employment center project on an infill site located within a transit priority area shall not be considered significant impacts on the environment.”²³ Accordingly, aesthetics and parking are no longer to be considered in determining if a project has the potential to result in significant environmental effects for projects that meet all of the following three criteria:

- a) The project is in a transit priority area;²⁴ and
- b) The project is on an infill site;²⁵ and
- c) The project is residential, mixed-use residential, or an employment center.²⁶

²² SB 743 can be found on-line at: http://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201320140SB743.

²³ See *Public Resources Code* Section 21099(d).

²⁴ *Public Resources Code* Section 21099(a) defines a “transit priority area” as an area within one-half mile of an existing or planned major transit stop. A “major transit stop” is defined in Section 21064.3 of the California *Public Resources Code* as a rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.

²⁵ *Public Resources Code* Section 21099(a) defines an “infill site” as a lot located within an urban area that has been previously developed, or a vacant site where at least 75 percent of the perimeter of the site adjoins, or is separated only by an improved public right-of-way from, parcels that are developed with qualified urban uses.

²⁶ *Public Resources Code* Section 21099(a) defines an “employment center” as a project located on property zoned for commercial uses with a floor area ratio of no less than 0.75 and located within a transit priority area.

The proposed project meets each of the above three criteria because it (1) is located within close proximity to several transit routes, (2) is located on an infill site that is already developed with residential care uses and is surrounded by urban development, and (3) would be an expansion of existing residential care uses. Thus, this Initial Study does not consider aesthetics and the adequacy of parking in determining the significance of project impacts under CEQA.

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

The Planning Department recognizes that the public and decision makers nonetheless may be interested in information pertaining to the aesthetic effects of a proposed project and may desire that such information be provided as part of the environmental review process. Therefore, some of the information that would have otherwise been provided in an aesthetics section of this Initial Study (such as elevations and cross-sections) has been included in **Section A, Project Description**. However, this information is provided solely for informational purposes and is not used to determine the significance of the environmental impacts of the project, pursuant to CEQA.

Similarly, the Planning Department acknowledges that parking conditions may be of interest to the public and the decision makers. Therefore, the Initial Study presents a parking demand analysis for informational purposes and will consider any secondary physical impacts associated with constrained supply (e.g., queuing by drivers waiting for scarce onsite parking spaces that affects the public right-of-way) as applicable in the transportation analysis.

Approach to Cumulative Impact Analysis

Two approaches to a cumulative impact analysis are provided in CEQA Guidelines Section 15130(b)(1): (a) the analysis can be based on a list of past, present, and reasonably foreseeable probable future projects producing closely related impacts that could combine with those of a proposed project, or (b) a summary of projections contained in a general plan or related planning document can be used to determine cumulative impacts. Given that projects reviewed in the vicinity are typically of the smaller scale common in residential neighborhoods (e.g., minor building expansion, kitchen and bathroom remodels, re-roofing, etc., with the largest being replacement of a single-family home with a new house), most individual projects in the vicinity would not be considered to combine with the proposed project to result substantial cumulative impacts. Accordingly, to the extent that the proposed project would result in cumulative impacts, these impacts would generally be considered in the context of citywide growth projections. These growth projections are based on expected annual population and traffic growth rates obtained from Citywide and regional projections by the San Francisco Planning Department and Association of Bay Area Governments. They are incorporated into the background assumptions for applicable cumulative analyses, including population and housing, transportation and circulation, noise, air quality, and utilities and service systems.

Separate from the proposed project, the Jewish Home is undertaking a retrofit of the Goodman Building to meet current seismic standards. This retrofit is under review by the California Office of Statewide Health

Planning and Development. The construction of the retrofit is contemplated to commence in the spring of 2016 and it is anticipated that the construction will last for approximately six months. This retrofit project has independent utility from the proposed project analyzed in this Initial Study, and the retrofit is therefore not included as one of the elements analyzed in this Initial Study.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
1. LAND USE AND LAND USE PLANNING – Would the project:					
a) Physically divide an established community?	☐	☐	☒	☐	☐
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐	☐
c) Have a substantial impact upon the existing character of the vicinity?	☐	☐	☒	☐	☐

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

The analysis considers whether the project would contribute to the physical division of an established community. Physical division can occur through construction of physical barriers or obstacles to access and circulation, or through an assemblage of land uses, that would restrict interaction of land uses among the project site and the adjacent neighborhoods. The project's contributions to the continuity of the existing land uses and circulation patterns are also considered in this analysis.

The division of an established community would typically involve the construction of a barrier to neighborhood access (such as a new freeway segment) or the removal of a means of access (such as a bridge or roadway) that would impair mobility within an existing community, or between an existing community and outlying areas. The analysis of the proposed project recognizes that the Jewish Home has been an institutional use in the neighborhood with a history characterized by periods of change and continuity since the 19th Century.

The proposed project would be a continuation of a long-standing institutional use in a mixed-use residential community, albeit in an intensified manner, and would introduce a new component to the project site (The Square) that would include provision of outpatient medical and other services to non-resident senior members. This intensified institutional use would not disrupt the neighborhood or physically divide the community. New buildings would be constructed, and some existing buildings would be removed. As stated in the Project Description, the physical changes proposed would occur within the existing campus, and involve only minor upgrades to the site's perimeter. The new services for

non-residents would occupy a relatively small portion of the site, and the new RCFE units would represent a continuation of an existing senior residential care use at the site. Although the egress point on Mission Street would be closed, that closure would be balanced by the two-way orientation of the Silver Avenue gate, as well as the new curb cut and auto entry point on Avalon Avenue, as well as the activation of the site and incorporation of pedestrian access along the Mission Street corridor. Pedestrian amenities would be constructed along this corridor in conformance with the Better Streets Plan.

Accordingly, the proposed project would not create a barrier or disrupt or divide the physical arrangement of the neighborhood. The proposed project would constitute a continuation of the same types of uses that currently exist on the site, and these uses would be expanded to serve a broader population. Access to these services would be enhanced via the new shuttle service, as analyzed under Topic 4, Transportation and Circulation.

The impact would be *less than significant*.

Mitigation: None required.

Impact LU-2: The proposed project would not conflict with any applicable land use plans, policies or regulations of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect. (Less than Significant)

As described above **Section C, Compatibility with Existing Zoning and Plans**, the proposed project would not obviously or substantially conflict with the General Plan or applicable regional land use plans, policies, and regulations such that an adverse physical change would result. The project application includes a request for the establishment of an SUD and Planned Unit Development for the proposed project, and the staff report to the Planning Commission will evaluate the consistency of the proposed project with General Plan policies and applicable Planning Code provisions.

Land use impacts are also considered to be significant if the proposed project would conflict with any plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. A conflict between a proposed project and applicable land use plans, policies and regulations of an agency with jurisdiction over the project does not necessarily indicate a significant effect on the environment under CEQA. The conflict must manifest itself in a substantial adverse physical change for a significant environmental effect to occur.

Environmental plans and policies are those that directly address environmental issues and/or contain targets or standards, which must be met in order to preserve or improve characteristics of the City's physical environment.

In addition, the proposed project would not obviously or substantially conflict with any such adopted environmental plan or policy including the 2010 CAP, the Greenhouse Gas Reduction Strategy, and the City's local tree ordinance, as discussed in **Section E.6, Air Quality, Section E.7, Greenhouse Gases, and Section E.12, Biological Resources**. Therefore, the proposed project would have a *less-than-significant* impact with regard to conflicts with land use plans, policies, or regulations.

Mitigation: None required.

Impact LU-3: The proposed project would not have a substantial impact upon the existing character of the vicinity. (Less than Significant)

The analysis of the project's effects on existing land use character includes consideration of the character of the proposed project relative to the existing land use context, as well as how a site user (resident, employee, volunteer, or visitor) would experience the land use of the site under existing and with-project conditions. Building size (height and bulk) is one overall factor in the consideration of land use character. Other considerations entail how existing uses on the site and in the vicinity would function with those proposed, how new buildings would facilitate or constrain how a site functions or is accessed, and whether new uses would preclude existing uses from operating in the future. An adverse effect could occur if a new use were placed next to an incompatible existing use, such that the basic function of either the existing use or the new use would be substantially impaired. For example, if a residential use were located next to a factory with toxic air emissions, either or both uses would be unable to function as intended.

The project would continue the pattern of institutional use within a residential neighborhood. The proposed project would not introduce new or incompatible land uses to the site or vicinity. The area surrounding the project site primarily contains two- to four-story residential, commercial, and mixed residential and commercial buildings, some of which include surface parking lots. The proposed project would result in demolition of the existing Main Building and construction of two new buildings. The new buildings would be located at the southwestern corner of the campus, facing onto Mission Street and Avalon Avenue. These new buildings would intensify the residential care for the elderly (RCFE) land uses on the project site, but they would not constitute a major change in terms of land uses.

The proposed buildings would exceed the maximum allowable height of the current height and bulk district mapped on the project site: 50-X. The change in the site's skyline may be perceived as some as adverse; however, this change would not be substantial in conjunction with the existing buildings of various heights across the sloped topography of the site. In addition, this consideration of heights must be kept within the context of land use, as the visual effects of taller buildings are not considered in this analysis, as stated at the beginning of Section E, above.

Although the new buildings would be taller and bulkier than the surrounding development to the west, south, and north, the intensity of use associated with that increased building size would not conflict with the surrounding land use character of the neighborhood. The intensified residential use on the site would have hours of operation generally consistent with those of the surrounding residential community, and the proximity of the proposed project's residential and medical uses with the existing surrounding residential uses and would not substantially impair either use.

The Jewish Home campus's built environment has adapted to the institution's uses and services over time, in conjunction with its past and current mission. For example, the completion of the Main Building in 1923 followed the merger of the Pacific Hebrew Orphan Asylum and Home Society with the Hebrew

Home for the Aged Disabled. The Goodman Building, Koret Center, and Friedman Pavilion were added as new levels of medical care and social facilities were added and the campus's population grew. These buildings were of a varied character depending on the nature of services provided, as well as the building sizes and characters typical of their times. The proposed project would continue this tradition of adaptive land use modification through demolition of the Main Building and construction of Buildings 1A and 1B to meet current RCFE standards.

The Square, a proposed collection of site- and neighborhood-serving medical and community use in the Rosenberg Building, as well as the retail use located along Mission Street, would introduce new uses to the project site that would serve both site residents and the surrounding community. The uses would not be incompatible with the project site's existing use or the existing nearby uses. Both the Square's services for non-residents and the neighborhood-serving retail use would not be considered incompatible with the surrounding residential area. The Square would complement the existing uses on the site, as well as create efficiencies for the Jewish Home, the broader Excelsior neighborhood, and others by providing for these services in a centralized location. In addition, operation of The Square uses is expected to occur mostly outside of the peak periods for traffic and parking in the area, which would minimize conflict with the hours of activity of surrounding uses. The traffic, noise, and air quality impacts of the increased intensity of uses are analyzed under Initial Study Topics 4, 5, and 6 (respectively) below.

Under future conditions uses on the site would continue to operate as an integrated campus, with on-site open space available to site residents. This juxtaposition of primary residence with site-serving open space would be similar to the nearby houses and duplexes with private yards. Also, the proposed project would activate the site perimeter adjacent on Mission Street, which would create street frontage with retail use that is consistent with nearby locations along Mission Street.

Although the increased building heights would present a visual change from existing conditions, as described under "Senate Bill 743 and Public Resources Code Section 21099," above, this Initial Study does not consider aesthetics in determining the environmental impacts pursuant to *Public Resources Code* Section 21099(e).

Therefore, the proposed project's impact on the existing character of the project's vicinity would be *less than significant*.

Mitigation: None required.

Impact C-LU-1: The proposed project would not make a considerable contribution to any cumulative significant land use impacts. (Less than Significant)

Cumulative land use impacts are evaluated in the context of existing, and reasonably foreseeable future projects in the project site vicinity, as well as applicable land use policies that guide future development in the project site vicinity. The cumulative land use analysis is geographically based on specific projects in the vicinity that, when combined, contribute to effects on the overall land use character of the Excelsior and Outer Mission neighborhoods, within a few blocks in each direction of the project site.

Foreseeable change is defined as collection of small, minor, site-specific changes. As discussed in the “Approach to Cumulative Impacts Analysis” section above, within the project site vicinity, small residential projects (comprising one-to-two units) are planned or proposed in the Excelsior neighborhood. Some projects would require modifications, variances, or exceptions to *Planning Code* requirements or *General Plan* land use designations. However, based on a review of the Planning Department’s databases, there are currently no applications on file in the vicinity of the project site that could considerably contribute to cumulative land use changes; therefore, the potential for combined land use effects is low. The seismic retrofit of the Goodman Building would not result in a change in type or intensity of land use.

The Citywide growth assumed in the cumulative land use analysis is accounted for in terms of traffic, noise, and air quality, as discussed in other sections of this Initial Study.

The proposed project would result in demolition of some existing buildings, and construction of new buildings, all within the boundaries of the existing site. It would not substantially alter the site borders. Overall, access to the site would increase, with pedestrian access along Mission Street and a new curb cut along Avalon Avenue. The project would intensify the existing institutional uses at the site within the context of the surrounding mixed use residential community, but this intensification would not combine with other past, present, or reasonably foreseeable projects to result in cumulative physical barrier effects or changes to land use character on a neighborhood scale. The proposed project is consistent with the land use designations for the project site, as would present, and reasonably foreseeable projects in the neighborhood. Therefore, cumulative land use impacts would be *less than significant*.

Mitigation: None required.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
2. POPULATION AND HOUSING – Would the project:					
a) Induce substantial 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 housing units or create demand for additional housing, necessitating the construction of replacement housing?	☐	☐	☒	☐	☐
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒	☐

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

In general, a project would be considered growth-inducing if its implementation would result in substantial population increases and/or new development that might not occur if the project is not implemented.

The City and County of San Francisco is expected to have a population of 847,000 residents in 2015, which is expected to increase to 1,085,700 by 2040.²⁷ As stated in the Project Description in Table 1, the project would result in 210 new residential care facility units. Assuming an average of approximately 1.16 residents per unit, with implementation of the proposed project, the number of seniors living at the Home would be approximately 619, compared to approximately 374 residents currently at the Home, an increase of 245 residents. Given the limited financial resources of many seniors, and the desires of their families to live in proximity for visits, it is unlikely that substantial numbers of seniors would move from areas outside of the Bay Area region to the Jewish Home. These additional seniors would be primarily existing residents of the City of San Francisco or immediate environs. Even if the 245 seniors were all new residents to the City of San Francisco, they would represent 0.09 percent (9 hundredths of 1 percent) of the residential population growth projected by 2040. As such, the project would not substantially increase the residential population of the City or County of San Francisco or the Bay Area.

San Francisco's employment is anticipated to be 617,420 in 2015, and employment is projected to grow to 759,500 by 2040.²⁸ The project is estimated to generate approximately 135 net new employees and volunteers on weekdays and approximately 85 net new employees and volunteers on weekends. Therefore, project-related employment growth would amount to approximately 0.18 percent (1 tenth of 1 percent) of citywide employment growth anticipated between 2015 and 2040, conservatively assuming that all employees and volunteers would be new to San Francisco; in actuality, some new workers at the campus would be likely to have relocated from other jobs already in San Francisco. This potential increase in employment will have likely negligible impact compared to the total employment expected in San Francisco and the greater San Francisco Bay area.

The increased population and employment generated by the proposed project would not induce substantial population growth in the area, either directly or indirectly. Therefore, the proposed project would have a *less-than-significant* impact on population growth.

Mitigation: None required.

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

As noted above, the project would result in a net increase in service capacity at the Jewish Home campus. With implementation of the proposed project, the number of on-site inhabitants at the Home would be approximately 619, compared to approximately 374 residents currently at the Home. Hence, there would be no residents or housing units displaced as a result of the project. Instead, the project would provide additional housing resources where some currently exist, and these resources would be specifically tailored to the needs of senior populations. Therefore, there would be *no impact* with regard to displacement of people. The increase of approximately 135 weekday, and 85 weekend, employees and

²⁷ Association of Bay Area Governments, *Plan Bay Area*, Projections 2013.

²⁸ *Ibid.*

volunteers could indirectly result in a slight increase in demand for additional housing, assuming that some of these new employees and volunteers would be new to the region. However, the number of such employees and volunteers would be very small compared to the total population and the available housing stock in San Francisco and the Bay Area, and would not necessitate the construction of new housing. This impact would be *less than significant*.

Mitigation: None required.

Impact C-PH-1: The proposed project, in combination with past, present, and reasonably foreseeable future projects in the vicinity, would not make a considerable contribution to any cumulative population and housing impacts. (Less than Significant)

The geographic scope for potential cumulative population and housing impacts encompasses the people living and working within the Bay Area region, generally including: the San Francisco peninsula, adjacent areas in the North Bay, East Bay and South Bay. Given the ongoing development projects across this region, including the anticipated population growth discussed below, cumulative effects to population and housing could occur.

Population growth is considered in the context of local and regional plans and population, housing, and employment projections. San Francisco is subject to a complex regulatory scheme that considers population and housing balance on a City-wide basis, including but not limited to the San Francisco Bay Area Regional Housing Needs Plan 2014-22 and the General Plan. An individual project is not required to result in a jobs-housing balance, and generally, a project that induces population growth is not viewed as having a significant impact on the environment unless this growth is unplanned and results in significant physical impacts on the environment. With respect to population, the Bay Area Region is expected to increase residential population from 7,461,400 in 2015 to 9,299,100 by 2040. The total number of jobs in the region is projected to increase from 3,669,990 to 4,505,320 over the same time period.²⁹ The proposed project would result in an increase of 245 senior residents on-site, as well as approximately 135 weekday employees and volunteers, and approximately 85 weekend employees and volunteers. Some of the approximately 220 new employees would be existing San Francisco residents. Any net new housing demand would have a negligible effect on demand for housing because it represents such small a percentage of projected employment and job growth between 2015 and 2040 in the City and County of San Francisco or the Bay Area region and does not represent unplanned growth. Therefore, the proposed project would have a less-than-considerable contribution to cumulative impacts related to population and housing. The impact would be *less than significant*.

Mitigation: None required.

²⁹ *Ibid.*

Topics:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Not Applicable
3. CULTURAL AND PALEONTOLOGICAL RESOURCES—Would the project:					
a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5, including those resources listed in Article 10 or Article 11 of the <i>San Francisco Planning Code</i> ?	☐	☐	☒	☐	☐
b) Cause a substantial adverse change in the significance of an archeological resource pursuant to §15064.5?	☐	☒	☐	☐	☐
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐	☐
d) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☒	☐	☐	☐

The proposed project would result in physical changes to the site including demolition, excavation, and construction that could affect cultural resources, which include historic architectural resources, archeological resources, paleontological resources, and human remains.

Project effects to historic architectural resources were analyzed in a Historic Resources Evaluation (HRE) report in 2014.³⁰ A Preservation Team Review (PTR) form was prepared by the Preservation Planning staff of the San Francisco Planning Department on October 2, 2014, which confirmed the findings of the Final HRE.³¹ The findings of the HRE and PTR are summarized below.

Historic Architectural Resources

Impact CP-1: The proposed project would not cause a substantial adverse change in the significance of an historical resource as defined in §15064.5, including those resources listed in Article 10 or Article 11 of the *San Francisco Planning Code*. (Less than Significant)

Project Site History

In 1872, the newly incorporated Pacific Hebrew Orphan Asylum and Home Society purchased what is now the Jewish Home property on the corner of Mission Street and Silver Avenue. The Society's mission was to found and maintain an asylum for orphan children and "to establish and support a Home for aged and infirm Israelites. The first construction recorded on the property was a Victorian-style building near the northeast corner of the parcel that was completed in 1891 to house elderly Jews. This building was located at the intersection of Silver Avenue with what was then India Avenue (present-day Peru Avenue); at the time, India Avenue extended to Silver Avenue. The remaining portions of the property,

³⁰ ESA, *Jewish Home of San Francisco Project, Final Historic Resources Evaluation* (HRE), Prepared for the San Francisco Planning Department, May 22, 2014. A copy of the Final HRE is available for public review under Case No. 2011.1323E at the San Francisco Planning Department, 1650 Mission Street.

³¹ San Francisco Planning Department, Preservation Team Review (PTR) Form, 302 Silver Avenue, October 2, 2014. A copy of the PTR is available for public review under Case No. 2011.1323E at the San Francisco Planning Department, 1650 Mission Street.

as well as most surrounding parcels, were still agricultural lands into the 1920s, although a few small shops, residences, and saloons were located along streets surrounding the project site, with a nascent commercial center growing up around the intersection of Mission Street and Silver Avenue by this time.

In 1919, the Pacific Hebrew Orphan Asylum and Home Society merged with the Hebrew Home for the Aged Disabled, with the combined institution retaining the latter's name. Funded by the Friedman bequest and by the donations of many other private benefactors, construction of the present Main Building on the previously purchased project site was completed in 1923. Architects Samuel Lightner Hyman and Abraham Appleton were selected to design this building. Hyman and Appleton would go on to become respected architects within the Jewish community and beyond, participating in the design of the Jewish Community Center with primary architect Arthur Brown, Jr., additions to Mt. Zion Hospital, and additions to the Hebrew Home for the Aged Disabled in 1931 and 1945.

As shown in **Figure 2**, the Main Building (1923) and Infirmary addition (1931) were designed in the Georgian Revival style of architecture, following Hyman & Appleton's training. Georgian Revival typically consists of Classical detailing, symmetrical facades, hipped or double pitched roofs with classical cornices, and doorways with fanlights or tabernacle frames.

In 1945, a third-story was constructed on the West Wing of the Main Building. The original cornice was removed from the West Wing when the third story was added, and the original cornice over the central pavilion was removed in the early 1960s. Also removed were other portions of the original entablature, including the frieze, along with the rooftop balustrade and the *Hebrew Home* inscription above the entrance.

The number of residents at the Home steadily increased over the twentieth century, resulting in an expanded campus of several buildings that provide various levels of medical care and social facilities for residents and their families. In addition to the Main Building with its additional wings, the site now plays host to the Goodman Building (added behind, and connected to the rear elevation of, the Main Building in 1969 and designed by Howard A. Friedman), an adjacent courtyard and fountain (designed by Lawrence Halprin), the Koret Center (1984), and the Friedman Pavilion (constructed in 1995 on the site of the original 1891 Pacific Hebrew Orphan Asylum and Home Society building).

In 2006, the Main Building's east wing (1923) was demolished and replaced with the Rosenberg Family Center. That same year the original grand entrance to the property at the corner of Mission Street and Silver Avenue was closed to pedestrian traffic, the original staircase removed, and the original front grounds were paved to accommodate additional vehicular parking and circulation. The Goodman Building was originally known as the Annex A Building, but was renamed the Edward and Marion Goodman Building in 2007, and provided 176 beds for skilled nursing care and rehabilitative services. See **Figure 2**, Existing Conditions, on page 3 for an overview of all buildings and structures on the project site.

Regulatory Background

CEQA Guidelines Section 15064.5 requires the lead agency to consider the effects of a project on historical resources. An historical resource is defined “as any building, structure, site, or object listed in or determined to be eligible for listing in the California Register of Historical Resources (CRHR), or determined by a lead agency to be significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, or cultural annals of California.”

A resource is considered “historically significant” if it meets at least one the following criteria for listing in the CRHR:

- 1) Is associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage;
- 2) Is associate with the lives of persons important in our past;
- 3) Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possess high artistic value; or
- 4) Has yielded, or may be likely to yield, information important in prehistory or history.³²

The CRHR generally follows the age requirement set forth in the National Register; that is, resources may be considered for evaluation if they are more than 50 years old. Historical resources achieving significance less than 50 years may also be considered for listing in the CRHR if it can be demonstrated that sufficient time has passed to understand its historical importance (California Code of Regulations, Title 14, Chapter 11.5, 4852(d)(2)). For this reason, and to give sufficient time for reporting and review, resources more than 45 years of age can be considered.

A resource eligible for listing in the CRHR must meet one of the criteria of significance described above, must be 45 years old or older, and must retain enough of its historic character or appearance (integrity) to be recognizable as an historical resource and to convey the reason for its significance. There are seven aspects of integrity—location, design, setting, materials, workmanship, feeling and association.

A project that would cause a substantial adverse change in the significance of a historical resource is one that would materially impair the resource. Material impairment is defined as the demolition or substantial alteration of those physical characteristics that convey the resource’s historical significance and that justify its eligibility for inclusion in the CRHR [CEQA Section 15064.5(b)(C)].

Evaluation Summary

All buildings, structures, and landscapes that are 45 years old or older were evaluated against the CRHR criteria as part of the HRE, including the Main Building (1923 – 1945), as well as the Goodman Building and its associated landscape comprised of a courtyard and fountain (1969). As no changes to the Goodman building and associated courtyard and fountain would occur as part of the proposed project, the focus of the evaluation was on the Main Building, which would be demolished and replaced with a

³² This criterion is generally applicable to archeological resources.

new facility. In addition, as the project site is the only institution in the vicinity, the analysis does not contemplate effects on an historic district, as none are present.

Provided below is a summary of the findings of the HRE relative to the Main Building.

CRHR Criterion 1 (Events). Research revealed that the Main Building, as the original and central component of the JHSF, is associated with the development of elderly care facilities in San Francisco as an important care facility associated with the city's Jewish community. The JHSF was established to operate under its founding philosophy to provide health and social care the elderly. The JHSF reflects the early twentieth century evolution of the establishment of care facilities for the elderly separate from the young or mentally ill. The construction of the Main Building in the 1920s and early 1930s was possibly due, in part, to generous support of local Jewish residents, and reflects the expanded mission of the home to care for a wide range of elderly individuals throughout the twentieth century. For these reasons, the Main Building is eligible for listing in the CRHR under Criterion 1 (Events).

CRHR Criterion 2 (Association with Individuals). Research did not reveal any important association with any prominent individuals. Although prominent members of the San Francisco Jewish community have been associated with the building, research did not identify any significant associations between individuals and the Main Building. The Main Building is not individually significant under CRHR Criterion 2 (Association with Individuals).

CRHR Criterion 3 (Architecture). The Main Building once embodied many of the distinctive characteristics of a type, period, or method of construction (Criterion 3). The Main Building was constructed in the Georgian Revival style and reflect some of the distinctive characteristics typical of that style: symmetrical composition enriched with classical ornament, brick cladding, central pavilion with gabled pediment, symmetrical fenestration, and classical ornament. The Main Building has, however, undergone considerable alterations since its original construction and no longer embodies the distinctive characteristics of the Georgian Revival style of its original construction. See discussion of Integrity, below, for more information.

Criterion 3 also asks whether the subject building is the work of an important creative individual. While the Main Building (including third-story addition) and Infirmary wing were designed by the architecture firm Hyman & Appleton, which included the more prominent partner of Abraham Appleton, the building does not appear to be a particularly outstanding example of this architectural firm's body of work. Hyman & Appleton designed numerous residences and institutional buildings throughout the San Francisco Bay Area, especially within the local Jewish community. Aside from the JHSF, some of their other projects in San Francisco included the streamlined Moderne remodeling of and five-story addition to the Crown Zellerbach Building in San Francisco (1930), the Jewish Community Center in San Francisco, with Arthur Brown Jr. (1932, now demolished), and the Nurses' Home at Mount Zion Hospital in San Francisco (1924). Appleton himself later went on to design numerous Midcentury Modern style public libraries that his successor firm of Appleton & Wolfard designed through the 1950s and 1960s. Although the Main Building of the JHSF was the first major work attributed to the firm of Hyman & Appleton, the building does not express a particular aspect of their work, or a particular idea or theme in their craft. Their architectural styles and design aesthetics appear to have changed with the architectural

styles of the day, and as such, their work represents a range of styles from different eras, rather than one particular style or design aesthetic. As such, the JHSF is not individually significant as an historical resource under Criterion 3 (Architecture).

CRHR Criterion 4. This criterion asks whether a proposed project has the potential to yield information important to pre-history or history. Because this criterion is typically associated with effects to archaeological resources, and not historic architectural resources, this criterion is addressed in part b, below.

Age. A fifty year age requirement is generally considered the appropriate age requirement for consideration of historic significance, although to allow for planning and review time, cultural resources more than 45 years of age are considered. The Main Building dates to 1923 and is 92 years old as of 2015. As such, the Main Building meets the age requirement for listing in the CRHR.

Integrity. In order to qualify for listing in the CRHR, a property must possess significance under one of the above mentioned criteria and possess historic integrity. As described above, seven variables or aspects that define integrity—location, design, setting, materials, workmanship, feeling and association—are used to evaluate a resource’s eligibility for listing in the CRHR. The Main Building maintains integrity of location, and association, but no longer retains integrity of design, materials, workmanship, setting or feeling, as described below.

Location: The location of the JHSF Main Building has not changed since its construction in 1923 and 1931, and thereby retains its historic location.

Association: Association is the direct link between an important historic event or person and a historic property. The Main Building has continuously operated as a care facility for the elderly since their construction in 1923, retaining its historic association.

Setting: Setting is the physical environment of a property. The JHSF was originally located at the center of an undeveloped block. The facility originally possessed an entry processional leading from the corner of Silver Avenue and Mission Streets to the building’s main entry. While this entry processional is still marked by a monumental gateway at the corner of Silver and Mission, and portions of the stairway, most of the processional was replaced by a surface parking lot and the gateway itself infilled with metal fencing, resulting in the elimination of the processional and altering the way the building is approached on foot. Construction of additional buildings within the complex has altered the setting and diminished the prominence of the Main Building. Not the least of the changes was the 1969 addition of the Goodman Building, which rises four stories above and immediately behind the Main Building in a contrasting architectural style and massing. Physically connecting the two buildings required the demolition of a sizeable portion of the original north-facing elevation of the Main Building. The glass and steel walkway linking the rear of the Infirmary wing with the southeastern corner of the Goodman Building also required removal of portions of the original façade. The addition of the Goodman Building nearly doubled the size of the JHSF’s campus footprint. The extent of the alterations to the size, massing, form, and location of the buildings on the site have compromised the Main Building’s integrity of setting.

Materials: Materials are the physical elements that were combined at a particular time and in a particular way to make up a property. The exterior of the Main Building has undergone significant changes, including the removal of the cornice from the central pavilion and the west wing, alterations

to the frieze including removal of the “Hebrew Home” inscription above the entrance, the replacement of the east wing with the Rosenberg Center, and alterations to the brick cladding in many locations on the building’s exterior to accommodate these changes to the plan. The Main Building’s remaining classical ornamentation is in relatively good condition, and overall the original fenestration pattern remains. In general, however, the Main Building has been substantially altered and has lost many of the original materials, resulting in a compromised integrity of materials.

Workmanship: Workmanship is the physical evidence of the crafts of a particular culture or people. As described above, the Main Building has undergone significant alterations and evidence of its original workmanship has been removed in the removal of the east wing, removal of the cornice and balustrade from the central pavilion, and removal of the cornice along the west wing when the third floor was added.

Feeling: Feeling is the property’s expression of the aesthetic or historic sense of a particular period of time. In addition to alterations to the historic setting of the building, the addition of a number of free standing buildings to the complex has affected the integrity of feeling. The Main Building once stood alone on the nine-acre site, but are now somewhat crowded and overshadowed by the assemblage of other, mostly larger structures which has reduced the property’s expression of the historic sense of a particular period of time.

Design: Design is the combination of elements that create the form, plan, space, structure, and style of a property. Finally, the removal and replacement of the east wing, alterations to the central pavilion, and the addition of the Goodman Building to the rear of the property prevent the building from retaining integrity of design.

Summary. The Main Building meets Criterion 1 (Events) due to its historical associations with the Jewish community in San Francisco, but does not retain sufficient integrity to convey these historical associations due to the substantial alterations which have occurred to the building and campus setting between 1945 and 2006. As the building does not meet requirements for listing in the CRHR, it does not meet the definition of an historical resource under CEQA as defined in §15064.5, and is not considered an “historical resource” for CEQA purposes.

The Planning Department’s PTR confirmed this finding and stated the following:

While the subject property was found to have significance under Criterion 1 (Historic Events) for its connection to local Jewish history, the cumulative changes to the Main Building and surrounding grounds are such that the structure no longer meets enough of the seven variables which define a resource’s historic integrity to qualify for listing in the California Register of Historic Places. Most affected are the non-functional, monumental entrance gate and partial staircase at the corner of Mission Street and Silver Avenue, the expanse of paved surfaces over the original front grounds to accommodate vehicular traffic, and the numerous design changes and partial demolition that have occurred to the Main Building itself to alter the original 1923 architecture. The parcel on which Jewish Home is located is anomalous with its surroundings—the context being largely comprised of low-scale single family houses—and does not meet any of the criteria for historic district eligibility. Therefore, 302 Silver Avenue is not eligible for listing in the California Register individually or as part of a historic district.

Although the proposed project would result in the demolition of the Main Building and would replace it with a new structure, the project would not cause a substantial adverse change in the significance of a historical resource, because the Main Building does not meet the definition of an 'historical resource' under §15064.5. As such, the proposed project would have a *less than significant* impact to historical resources.

Mitigation: None required.

Archeological Resources

Impact CP-2: The proposed project could potentially cause a substantial adverse change in the significance of an archeological resource pursuant to §15064.5. (Less than Significant with Mitigation)

Archeological resources, including archeological resources that qualify as historical resources according to CEQA Guidelines Section 15064.5, comprise both historic-era and prehistoric archeological resources. A Preliminary Archeological Review prepared by the Planning Department archeologist in 2014, provides the following archeological assessment for the proposed project.³³

The proposed project would not affect any potential historic-era archeological sites or districts (i.e. foundations or artifact deposits) related to the first construction of the Pacific Hebrew Orphan Asylum and Home Society on the property (a Victorian-style building near the northeast corner of the parcel completed in 1891). The site is now occupied by the Friedman Pavilion constructed in 1995.

Regarding prehistoric-era archaeological sites and districts, the project area is within the traditional territory of the Ohlone, Mutsun, and Rumsun people.³⁴ Collectively referred to by ethnographers as Costanoan, there were actually distinct sociopolitical groups that spoke at least eight languages of the same Penutian language group. The Ohlone occupied a large territory from San Francisco Bay in the north to the Big Sur and Salinas Rivers in the south. The San Francisco peninsula is located within former Ramaytush Costanoan territory. Events of the early historic period completely disrupted native lifeways and ultimately resulted in the decimation of all Costanoan language groups. In 1776, both San Francisco de Asis and the San Francisco Presidio were established on the peninsula. Indian labor was important in the construction and repair of the Presidio and the related fortification, Castillo de San Joaquin (now occupied by Fort Point); Native Americans also worked as household servants, vaqueros, soldiers, shipbuilders, and skilled navigators and pilots.³⁵

³³ Environmental Planning Preliminary Archeological Review (PAR) Checklist Form, *Jewish Home of San Francisco, 302 Silver Avenue*, Prepared by Randall Dean, Revised November 7, 2014. A copy of the PAR is available for public review under Case No. 2011.1323E at the San Francisco Planning Department, 1650 Mission Street.

³⁴ Levy, Richard, *Costanoan in California*, edited by Robert F. Heizer, pp. 485–495. *Handbook of North American Indians*, Vol. 8, William C. Sturtevant, general editor. Smithsonian Institution, Washington D.C., 1978.

³⁵ Meyer, Jack, Greg White, and Susan Alvarez, *Prehistoric Archaeology: Overview and Research Context in SF-80 Bayshore Viaduct Seismic Retrofit Project*. Edited by Mary Praetzelis. Prepared by Anthropological Studies Center for Caltrans District 4, Oakland, CA, 2001.

Based on the geotechnical report prepared for the proposed project,³⁶ fill occupies the project area ranging from very shallow (2 feet below ground surface [bgs]) to moderate depths (20 feet bgs). Construction of the original 1891 Jewish Home and other buildings on the project site and in the vicinity likely resulted in some disturbance to the historic-era land surface. The fill is underlain by up to about 35 feet of medium dense to very dense sand with silt and silty sand of the Colma Formation. The Colma Formation was formed in the Pleistocene-era and provided a stable land surface available for occupation for many thousands of years by prehistoric peoples in the San Francisco Bay Area. The upper five feet of the Colma Formation is considered archeologically sensitivity for prehistoric deposits dating from the Middle- to Late Holocene-eras.

Despite the general archeological sensitivity of the Colma Formation for prehistoric occupation and use, there is a lessened sensitivity based on the environmental setting, including the paucity of nearby water sources and the known archeological site distribution on the San Francisco peninsula. There is a low potential for uncovering archeological resources during project implementation. However, it is possible that previously unrecorded and buried (or otherwise obscured) archeological deposits could be discovered during project ground disturbing activities. Excavating, grading, and moving heavy construction vehicles and equipment could expose and have impacts on unknown archeological resources, which would be a significant impact. However, this impact would be reduced to a less-than-significant level with implementation of **Mitigation Measure M-CP-2, Accidental Discovery of Archeological Resources**. This requires that archeological resources be avoided and, if accidentally discovered, that they be treated appropriately.

Mitigation Measure M-CP-2: Accidental Discovery of Archeological Resources.

The following measures shall be implemented should construction activities result in the accidental discovery of a cultural resource:

The following mitigation measure is required to avoid any potential adverse effect from the proposed project on accidentally discovered buried or submerged historical resources as defined in CEQA Guidelines Section 15064.5(a)(c). The project sponsor shall distribute the Planning Department archeological resource "ALERT" sheet to the project prime contractor; to any project subcontractor (including demolition, excavation, grading, foundation, etc. firms); or utilities firm involved in soils disturbing activities within the project site. Prior to any soils disturbing activities being undertaken each contractor is responsible for ensuring that the "ALERT" sheet is circulated to all field personnel including, machine operators, field crew, supervisory personnel, etc. The project sponsor shall provide the Environmental Review Officer (ERO) with a signed affidavit from the responsible parties (prime contractor, subcontractor(s), and utilities firm) to the ERO confirming that all field personnel have received copies of the Alert Sheet.

Should any indication of an archeological resource be encountered during any soils disturbing activity of the project, the project Head Foreman and/or project sponsor shall immediately notify the ERO and shall immediately suspend any soils disturbing activities in

³⁶ Treadwell and Rollo. Preliminary Geotechnical Evaluation Jewish Home of San Francisco. 15 February 2012.

the vicinity of the discovery until the ERO has determined what additional measures should be undertaken.

If the ERO determines that an archeological resource may be present within the project site, the project sponsor shall retain the services of a qualified archeological consultant, based on standards developed by the Planning Department archeologist. The archeological consultant shall advise the ERO as to whether the discovery is an archeological resource, retains sufficient integrity, and is of potential scientific/historical/cultural significance. If an archeological resource is present, the archeological consultant shall identify and evaluate the archeological resource. The archeological consultant shall make a recommendation as to what action, if any, is warranted. Based on this information, the ERO may require, if warranted, specific additional measures to be implemented by the project sponsor.

Measures might include: preservation in situ of the archeological resource; an archeological monitoring program; or an archeological testing program. If an archeological monitoring program or archeological testing program is required, it shall be consistent with the Environmental Planning (EP) division guidelines for such programs. The ERO may also require that the project sponsor immediately implement a site security program if the archeological resource is at risk from vandalism, looting, or other damaging actions.

The project archeological consultant shall submit a Final Archeological Resources Report (FARR) to the ERO that evaluates the historical significance of any discovered archeological resource and describing the archeological and historical research methods employed in the archeological monitoring/data recovery program(s) undertaken. Information that may put at risk any archeological resource shall be provided in a separate removable insert within the final report.

Copies of the Draft FARR shall be sent to the ERO for review and approval. Once approved by the ERO, copies of the FARR shall be distributed as follows: California Archeological Site Survey Northwest Information Center (NWIC) shall receive one (1) copy and the ERO shall receive a copy of the transmittal of the FARR to the NWIC. The Environmental Planning division of the Planning Department shall receive one bound copy, one unbound copy and one unlocked, searchable PDF copy on CD three copies of the FARR along with copies of any formal site recordation forms (CA DPR 523 series) and/or documentation for nomination to the National Register of Historic Places/California Register of Historical Resources. In instances of high public interest or interpretive value, the ERO may require a different final report content, format, and distribution than that presented above.

Paleontological Resources

Impact CP-3: The proposed project could potentially directly or indirectly destroy a unique paleontological resource or site or unique geologic feature. (Less than Significant with Mitigation)

Paleontological resources along the San Francisco Peninsula consist of the fossilized remains of plants and animals. These include vertebrates (animals with backbones) and invertebrates (animals without backbones, such as starfish, clams, ammonites, and marine coral), and fossils of microscopic plants and animals (microfossils). The age and abundance of fossilized remains depend on the location, topographic setting, and particular geologic formation in which the fossils are found. Fossil discoveries not only

provide a historical record of past plant and animal life but can assist geologists in dating rock formations. Fossil discoveries can expand our understanding of the geologic periods and the geographic range of existing and extinct flora or fauna.

The Society of Vertebrate Paleontology (SVP) has established guidelines for identifying, assessing, and mitigating adverse impacts on nonrenewable paleontological resources.³⁷ Most practicing paleontologists in the United States adhere closely to the SVP's assessment, mitigation, and monitoring guidelines, which were approved through a consensus of professional paleontologists. Many federal, state, county, and city agencies have either formally or informally adopted the SVP's standard guidelines for mitigating adverse construction-related impacts on paleontological resources.

The SVP has helped define the value of paleontological resources. In particular, it indicates that geologic units of high paleontological potential are those from which vertebrate or significant invertebrate or significant suites of plant fossils have been recovered; that is, those that are represented in institutional collections. Sensitivity is determined based on two criteria: (1) the potential for yielding abundant or significant vertebrate fossils or a few significant fossils, large or small, that are vertebrate, invertebrate, plant, or trace fossils, and (2) the importance of recovered evidence for new and significant taxonomic, phylogenetic, paleoecologic, taphonic, biochronological, or stratigraphic data. Rock units that contain potentially datable organic remains older than late Holocene are also classified as having high potential. These units include deposits from animal nests or middens and units that may contain new vertebrate deposits, traces, or trackways.

Geologic units of low paleontological potential are those that are not known to have produced a substantial body of significant paleontological material. As such, the sensitivity of an area with respect to paleontological resources hinges on its geologic setting and whether significant fossils have been discovered in the area or in similar geologic units.

On the Peninsula and in San Francisco, most fossils are generally found along the Pacific Coast in marine units, such as the Purisima Formation, Monterey Formation, Butano Formation, Colma Formation, and Merced Formation. They are also found within the outcropping marine units in the Santa Cruz Mountains. Fossils found along the coast include vertebrates (e.g., extinct camels, horses, and sea mammals) and invertebrates (e.g., clams and corals). Fossil localities diminish along the eastern flank of the Santa Cruz Mountains, likely due to the presence of chaotically mixed and severely fractured Franciscan Complex bedrock and geologically younger alluvial deposits in the upland foothills.³⁸

³⁷ Society of Vertebrate Paleontology (SVP), *Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources*. <http://vertpaleo.org/PDFS/24/2482305f-38f8-4c1b-934c-1022d264e621.pdf>, accessed on November 9, 2013.

³⁸ Fossils are rarely found in the Franciscan Complex bedrock of the Coast Range Province; any fossil remains originally present in the rock would not likely remain because the Franciscan Complex in this area is a chaotically mixed and fragmented mass of rock in a sheared matrix.

Geologic units at the project area include artificial fill and the Pleistocene-aged Colma Formation underlain by Franciscan bedrock.³⁹ The Colma Formation has the potential to contain paleontological resources. A search of the fossil collections database at the University of California Museum of Paleontology did not identify any vertebrate fossil localities within the Colma Formation in San Francisco.⁴⁰ Vertebrate fossils, including parts of mammoths and bison, have been found in the Colma Formation in San Francisco, near the base of Telegraph Hill.⁴¹ In addition, a mammoth tooth was discovered in the Colma Formation during excavation for the Transbay Transit Center in downtown San Francisco in 2012.⁴² Because fossil remains of vertebrates have been found in the Colma Formation in two San Francisco locations, the Colma Formation is deemed to have a high potential to include paleontological resources.

Excavation for the proposed project would extend into the underlying Colma Formation. While there have been no fossils identified at locations in the immediate project vicinity, as discussed above, the Colma Formation is considered to have a high paleontological sensitivity. Consequently, given the sensitivity of the formation and the excavation area that could extend into the formation, project excavation could potentially damage buried paleontological resources in the project site, which would result in a significant impact. This impact would be reduced to less-than-significant level with implementation of **Mitigation Measure M-CP-3, Accidental Discovery of Paleontological Resources**. This requires the remediation contractor to stop all ground disturbances within 50 feet if a paleontological resource is encountered during excavation and to implement actions to investigate the discovery and recover the fossil remains by a qualified professional, as appropriate, before ground disturbing activities can resume.

Mitigation Measure M-CP-3: Accidental Discovery of Paleontological Resources.

The following measures shall be implemented should construction result in the accidental discovery of paleontological resources:

To reduce the potential for the proposed project to result in a significant impact on paleontological resources, the project sponsor shall arrange for a paleontological training by a qualified paleontologist regarding the potential for such resources to exist in the project site and how to identify such resources. The training could consist of a recorded presentation that could be reused for new personnel. The training shall also include a review of penalties for looting and disturbance of these resources. An alert sheet shall be prepared by the qualified paleontologist and shall include the following:

1. A discussion of the potential to encounter paleontological resources;
2. Instructions for reporting observed looting of a paleontological resource; and instructions that if a paleontological deposit is encountered within a project area, all soil-disturbing

³⁹ Bonilla, M. G., Preliminary Geologic Map of the San Francisco South 7.5' Quadrangle and Part of the Hunters Point 7.5' Quadrangle, San Francisco Bay Area, California.

⁴⁰ University of California Museum of Paleontology, collections database <http://www.ucmp.berkeley.edu/science/collections.php>, November 9, 2013.

⁴¹ Rodda, Peter U. and Nina Baghai, *Late Pleistocene Vertebrates from Downtown San Francisco*, California, Journal of Paleontology, Vol. 67, No.6 November 1993, pp. 1058-1063, <http://www.jstor.org/discover/10.2307/1306122?uid=3739560&uid=2129&uid=2&uid=70&uid=4&uid=3739256&sid=21101675124861>

⁴² Transbay Transit Center, Archeology <http://transbaycenter.org/project/archeology>, December 2, 2013.

activities in the vicinity of the deposit shall cease within 50 feet and the ERO shall be notified immediately; and,

3. Who to contact in the event of an unanticipated discovery.

If potential fossils are discovered by construction crews, all earthwork or other types of ground disturbance within 50 feet of the find shall stop immediately until the qualified professional paleontologist can assess the nature and importance of the find. Based on the scientific value or uniqueness of the find, the paleontologist may record the find and allow work to continue, or recommend salvage and recovery of the fossil. The paleontologist may also propose modifications to the stop-work radius based on the nature of the find, site geology, and the activities occurring on the site. If treatment and salvage is required, recommendations shall be consistent with Society of Vertebrate Paleontology guidelines (1995) and currently accepted scientific practice, and shall be subject to review and approval by the ERO or designee. If required, treatment for fossil remains may include preparation and recovery of fossil materials so that they can be housed in an appropriate museum or university collection, and may also include preparation of a report for publication describing the finds. The project sponsor shall be responsible for ensuring that treatment is implemented and reported to the San Francisco Planning Department. If no report is required, the project sponsor shall nonetheless ensure that information on the nature, location, and depth of all finds is readily available to the scientific community through university curation or other appropriate means.

Human Remains

Impact CP-4: The proposed project could potentially disturb human remains, including those interred outside of formal cemeteries. (Less than Significant with Mitigation)

The project is subject to the provisions of *California Health and Safety Code*, Section 7050.5, with respect to the discovery of human remains. The PRC Section 5097.98, regulates the treatment and disposition of human remains encountered during project grading and construction.

Although no known human burials have been documented on the project site or within its general vicinity, and the likelihood is low, the possibility of encountering human remains cannot be entirely discounted, as human remains could be buried with no surface indicators. Earthmoving associated with project construction could directly affect previously undiscovered human remains. Therefore, the potential impact regarding disturbance to human remains could be significant. However, this impact would be reduced to a less-than-significant level with implementation of **Mitigation Measure M-CP-4, Accidental Discovery of Human Remains**. This requires avoidance measures or the appropriate treatment of human remains if any are accidentally discovered during project implementation.

Mitigation Measure M-CP-4: Accidental Discovery of Human Remains.

The following measures shall be implemented should construction activities result in the accidental discovery of human remains and associated cultural materials:

The treatment of human remains and of associated or unassociated funerary objects discovered during any soil-disturbing activities shall comply with applicable state laws. This shall include

immediate notification of the coroner of the county within which the project is located and, in the event of the coroner's determination that the human remains are Native American, notification of the California Native American Heritage Commission, which shall appoint a most likely descendant (MLD) (PRC Section 5097.98). The archeological consultant, project sponsor, and MLD shall make all reasonable efforts to develop an agreement for the treatment, with appropriate dignity, of human remains and associated or unassociated funerary objects (CEQA Guidelines Section 15064.5[d]). The agreement should take into consideration the appropriate excavation, removal, recordation, analysis, custodianship, curation, and final disposition of the human remains and associated or unassociated funerary objects. The PRC allows 24 hours to reach agreement on these matters. If the MLD and the other parties do not agree on the reburial method, the project sponsor shall follow Section 5097.98(b) of the PRC, which states that "the landowner or his or her authorized representative shall reinter the human remains and items associated with Native American burials with appropriate dignity on the property in a location not subject to further subsurface disturbance."

Impact C-CP-1: The proposed project, in combination with other past, present, and reasonably foreseeable future projects, would not result in significant adverse cumulative cultural resource impacts. (Less than Significant)

The geographic scope of potential cumulative impacts on cultural resources encompasses the project area and nearby vicinity, including the Excelsior and Outer Mission neighborhoods. The projects reviewed in the vicinity are common in residential neighborhoods (e.g., minor building expansion, kitchen and bathroom remodels, re-roofing, etc., with the largest being replacement of a single-family home with a new, larger house or apartment building). There are no recorded historical resources or historic districts in the immediate project vicinity that could be affected, either directly or indirectly, by the proposed project. Even if such resources were to exist in the vicinity, the collection of uses on the project site is of such distinct character that the likelihood of changes external to the site combining with the changes to the institution would not result in a significant cumulative impact. For example, the large-scale, Classical Revival style Main Building on the project site is substantially different from the smaller, single-family and multi-family homes which represent many different architectural styles from many different eras, and, therefore, there is little possibility that changes to these homes would combine with the changes at the project site to form a significant cumulative impact to historic architectural resources.

House replacement projects in the vicinity could cause some degree of ground disturbance during construction, and thus could contribute to a potential cumulative impact on previously unrecorded and buried cultural resources.

Background research suggests that the potential to encounter archeological resources, paleontological resources, or human remains would be low. However, the proposed project, in combination with other ground disturbing projects in the vicinity, has the potential to affect unknown resources should they be present. With implementation of **Mitigation Measures M-CP-2, Accidental Discovery of Archeological Resources, M-CP-3, Accidental Discovery of Paleontological Resources, and M-CP-4, Accidental Discovery of Human Remains**, the proposed project's contribution to the potential cumulative impact would be less-than-significant with mitigation).

Topics:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Not Applicable
4. TRANSPORTATION AND CIRCULATION – Would the project:					
a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	☐	☐	☒	☐	☐
b) Conflict with an applicable congestion management program, including but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	☐	☐	☒	☐	☐
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location, that results in substantial safety risks?	☐	☐	☐	☐	☒
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses?	☐	☐	☒	☐	☐
e) Result in inadequate emergency access?	☐	☐	☒	☐	☐
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	☐	☐	☒	☐	☐

The proposed project would not result in a change of air traffic patterns, and thus would not result in substantial safety risks related to air traffic. Therefore, Topic E.4(c) is not applicable to the proposed project.

The information below is summarized from a background Transportation Impact Study (TIS) prepared for the proposed project.⁴³

Setting

The project site is located within the Excelsior Neighborhood and is bounded by Silver Avenue to the north; Avalon Avenue to the south; Lisbon Street to the east; and Mission Street to the west. The site is mostly served by local streets as well as arterial roadways that provide access to the regional freeway system. Vehicles traveling to/from the East Bay (via I-280, U.S. 101, I-80 and the Bay Bridge) and the Peninsula (via U.S. 101, I-280 and State Route 82) use various routes to access the project site vicinity including Alemany Boulevard, San José Avenue, and Mission Street. Vehicles traveling to/from the North Bay primarily use State Route 1 (19th Avenue), Ocean Avenue, and Mission Street.

⁴³ San Francisco Planning Department, *Jewish Home of San Francisco (302 Silver Avenue) Transportation Impact Study*, May 2015. This document is available for review at the Planning Department, 1650 Mission Street, Suite 400, in Case File No. 2013.0154E.

The project site is served by several Muni bus lines, and these routes connect to other Muni routes and to regional transit routes. There are six Muni lines (14 Mission, 14R Mission Rapid, 14X Mission Express, 44 O'Shaughnessy, 49 Van Ness-Mission, and 52 Excelsior bus lines) with stops within a reasonable walking distance of the project site; the closest stops are located at the Mission Street / Silver Avenue intersection, and at the Silver Avenue / Alemany Boulevard intersection. Other Muni lines in the general project area, but outside typical walking range (and in some cases, requiring travel on one of the above-cited close-in bus lines to access), include 8X Bayshore Express, 23 Monterey, 29 Sunset, 54 Felton, and the J Church and K Ingleside.

Parking occupancy conditions within the project area were observed during field visits in July 2012 and September 2014 during weekday midday and evening periods. Because on-street parking spaces were observed to be generally fully-utilized, with limited availability on most blocks, no formal counts of on-street parking supply or occupancy were conducted. The project area does not include any public off-street parking facilities. A parking analysis in 2011 revealed that Jewish Home's peak parking demand for on-street parking spaces occurs at about 3:00 p.m.

Impact TR-1: The proposed project would not conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation, nor would the proposed project conflict with an applicable congestion management program, including but not limited to level of service standards and travel demand measures. (Less than Significant)

To determine whether the proposed project would conflict with a transportation- or circulation-related plan, ordinance, or policy, this section analyzes the proposed project's effects on intersection operations, transit demand, impacts on pedestrian and bicycle circulation, parking, and freight loading, as well as construction impacts.

Trip Generation

The Planning Department's *Transportation Impact Analysis Guidelines for Environmental Review (SF Guidelines)* do not provide trip generation rates for non-standard uses with unique trip generation and travel behavior; therefore, the analysis of project travel and parking demand did not follow the approach and methodologies presented in the *SF Guidelines* (with the exception of the proposed retail space). Travel demand estimates of daily and peak-hour new trips generated by the proposed project were made based on information provided by the project sponsor about existing and projected future residents, staff, volunteers, visitors, and day-users. **Table 2** provides the estimated weekday p.m. peak hour trip generation for the proposed project.

The proposed project would generate about 95 new vehicle-trips during the weekday p.m. peak hour (11 inbound and 84 outbound). In addition, the proposed closure of the existing Exit-Only site access driveway on Mission Street, and change to the site access driveway on Silver Avenue from Entry-Only to Entry-Exit, would result in a redistribution of existing vehicle trips leaving the project site.

TABLE 2
PROJECT-GENERATED WEEKDAY PM PEAK-HOUR TRAVEL DEMAND ESTIMATE
(NET NEW TRIPS)

Category	PM Peak-Hour Trips				
	Vehicle Trips (Total)	Transit Trips	Shuttle Trips	Walk Trips	Bicycle Trips
Residents	0 ^a	-- ^a	-- ^a	-- ^a	-- ^a
Staff ^b	46	17	0	6	1
Visitors	2	2	0	1	1
The Square	26	0	0	0	0
Retail	21	7	0	14	1
TOTAL	95	26	0	21	3

^a Most residents would not have access to a car (i.e., primarily would be in skilled nursing units and assisted living units), for whom off-site travel would be accommodated by existing shuttle vehicles (i.e., new residents would be accommodated on existing shuttle trips, or by being picked up / dropped off in a vehicle driven by a relative or friend. However, the proposed project would provide parking spaces for up to 11 cars for the assisted living (non-memory care) units, to accommodate residents who wish to hold onto a degree of independence. In light of the nature of residents living in assisted living units, it is expected that those residents at some point would give up their parking space, and during the time that they still had their car would not use their cars much at all (driving only during non-peak traffic hours). For purposes of this analysis, it is conservatively assumed that each of the 11 cars would be used once per day, generating 22 vehicle trips.

^b There would be an increase of 135 total employees and volunteers, 99 working the day shift, and 36 working the night and overnight shifts. Daily trips (on different modes) would be generated by the 135 total staff, whereas p.m. peak-hour trips would be generated only by staff working the day shift.

SOURCES: ESA, 2015, based on information provided by the Proposed Sponsor (resident, staff, volunteer, visitor, and day-user counts, and travel mode characteristics of resident, staff, volunteer, and day-users), and travel demand characteristics of retail space and travel mode characteristics of visitors in the 2002 San Francisco Transportation Impact Analysis Guidelines for Environmental Review.

In general, the proposed project would result in minor changes to the average delay per vehicle at the study intersections during the p.m. peak hour. As shown in **Table 3**, all but one of the study intersections would operate at the same service levels as under existing conditions, and while the project would cause the level of service at the Mission Street / Silver Avenue intersection to worsen from LOS B to LOS C, it would remain at an acceptable level. The stop-controlled side-street eastbound approach (Theresa Street) at the unsignalized Alemany Boulevard / Theresa Street intersection would continue to operate at LOS E, but as is the case currently, there would be very few (five) vehicles on the eastbound Theresa Street approach during the p.m. peak hour (none of which would be generated by the project). In addition, the intersection would not meet Caltrans Traffic Signal Warrant 3 (Peak Hour) under existing plus project conditions, and therefore, the impact would be less than significant. Project-related traffic would operate similar to existing traffic patterns and would not introduce any new hazardous traffic operating conditions. As such, the project impact to traffic conditions would be *less than significant*.⁴⁴

Mitigation: None required.

⁴⁴ The impact analysis assumes the project's two parking levels would not be connected with an internal ramp. If an internal ramp were to connect the parking levels, there would be an increased use of the Avalon Avenue site access (and decreased use of the Silver Avenue site access), and the impact also would be less than significant, as the Mission Street / Avalon Avenue intersection (at LOS A) has excess capacity to accommodate the added traffic.

TABLE 3
PROJECT AREA INTERSECTION OPERATING CONDITIONS DURING
EXISTING AND EXISTING PLUS PROJECT WEEKDAY PM PEAK-HOUR CONDITIONS

Intersection	Existing		Existing plus Project	
	LOS ^a	Delay ^a	LOS ^a	Delay ^a
Signalized^b				
1. Mission Street / Silver Avenue	B	14.2	C	22.1
2. Mission Street / Avalon Avenue-Theresa Street	A	9.4	A	9.3
6. Alemany Boulevard / Silver Avenue	C	26.5	C	27.0
Unsignalized^c				
3. Avalon Avenue / Lisbon Street (AWSC) Worst Approach ^c :	A	9.0 Eastbound	A	9.1 Eastbound
4. Silver Avenue / Lisbon Street (AWSC) Worst Approach ^c :	B	12.6 Westbound	B	12.7 Westbound
5. Alemany Boulevard / Theresa Street (SSSC) Worst Approach ^c :	E	42.8 Eastbound	E	44.0 Eastbound
7. Avalon Avenue / London Street (SSSC) Worst Approach ^c :	B	11.8 Northbound	B	11.8 Northbound

^a LOS was determined using analysis methodologies presented in the 2000 *Highway Capacity Manual*.

^b The LOS and delay (in seconds) for signalized intersections represent conditions for the overall intersection.

^c The LOS and delay for unsignalized intersections represent conditions for the worst (most congested) approach, with the worst approach identified (e.g., Eastbound for Intersection 5).

Unacceptable operations are indicated in **bold** type.

SOURCE: ESA, 2015.

The project sponsor has identified **Improvement Measure I-TR-1: Implement Transportation Demand Management Strategies to Reduce Single-Occupancy Vehicle Trips**, which would reduce trip generation and impacts to intersection levels of service below the less-than-significant levels documented above.

Improvement Measure I-TR-1: Implement Transportation Demand Management Strategies to Reduce Single-Occupancy Vehicle Trips.

The Jewish Home proposes to include a Transportation Demand Management (TDM) program as part of the project, including elements such as last mile shuttles, transit fare subsidies, priced parking, bike facilities, on-site car share, on-site services, a TDM concierge and carpool matching assistance.

Loading

Truck Loading. The Jewish Home campus currently contains three off-street loading spaces, with two spaces at the main loading dock located at the Rosenberg Building, and a space at a second loading dock at the Friedman Building. The proposed project would retain the existing loading spaces, which would be accessible via the Silver Avenue driveway. In addition, subject to SFMTA approval, the proposed project would include a 25-foot-long “yellow-curb” loading zone on Mission Street as a designated on-street

commercial loading area to accommodate deliveries to the proposed retail space at the Mission Street / Avalon Avenue corner. The designation of an on-street loading space would displace up to two metered on-street parking spaces. The kitchen in the Rosenberg building would be where all food for both the existing and RCFE facilities would be delivered and stored. As such, all food deliveries for the Home under project conditions would be through the Rosenberg loading area, with food transported from the Rosenberg kitchen to a new kitchen in the RCFE Building 1A. The proposed project would not substantially change loading conditions from current conditions, as there would be efficiencies of scale realized by individual deliveries bringing food for the above-described kitchens. Therefore, deliveries for the increased number of residents likely would be made by a similar number of vehicles, and the current on-site loading zones would continue to accommodate the demand.⁴⁵ The 4,600 sq. ft. of retail space would generate a demand for one loading space per day, and the above-described proposed designation of a loading zone on Mission Street would accommodate that demand.

The various procedures / tasks that occur at present (e.g., move-in / move-out of residents, and garbage/recycling collection) would be the same under project conditions. That is, they would occur on-site (no impedance of traffic flow on area roadways).

Passenger Loading (Shuttle Service). It is anticipated that approximately 50 percent of seniors using the facilities of The Square would be brought to the Jewish Home by shuttle van service, as well as all of the estimated 25 adult day clients. Shuttle riders would be dropped off at a circular vehicular drop off zone of approximately 35 feet to be developed near the existing Rosenberg pedestrian entrance, accessible from the Silver Avenue entrance and surface parking area. The circulation pattern would effectively serve the shuttle vehicles without adversely affecting vehicle movements to and from the loading docks and parking lot/structure.

The proposed project would have a *less-than-significant* loading impact because existing loading conditions would not be substantially affected.

Construction Activities

Project construction would last about 24 months, generally occurring Monday through Friday, between 7:00 a.m. and 8:00 p.m., and the typical work shift for most construction workers would be from 7:00 a.m. to about 3:30 p.m.⁴⁶ Staging is likely to occur primarily on-site and on Avalon Avenue. As is standard procedure as part of the building permit process, any temporary sidewalk, parking, or traffic lane closures would be coordinated with City agencies in order to minimize the impacts on traffic. The impact of construction truck traffic would be a temporary lessening of the capacities of local streets due to the size, slower acceleration, and larger turning radii of trucks, which may temporarily affect traffic and transit operations and increase traffic, pedestrian, and bicycle conflicts near the project site. Truck traffic to and from the site would be routed along major arterials and freight routes, as identified by SFMTA. In

⁴⁵ The kitchen in the Rosenberg building would be where all food for both the existing and RCFE facilities would be prepared. As such, all food deliveries for the new and existing facility would be through the Rosenberg loading area, with food transported underground from the Rosenberg kitchen to a new satellite kitchen in the RCFE Building 1A.

⁴⁶ Per the San Francisco Department of Public Health, construction noise is generally permitted in San Francisco between the hours of 7:00 a.m. to 8:00 p.m., seven days per week.

the area, these routes include Alemany Boulevard. However, immediate access to the site would likely require trucks to use Mission Street, Avalon Avenue and Silver Avenue.

Of note, the Mio Preschool is located in proximity to the project site (on Mission Street just south of Avalon Avenue), and coordination would be required to ensure that trucks traveling on Mission Street do not conflict with vehicles stopping to drop-off and pick-up children at the preschool. To the extent possible, the sponsor should limit construction truck traffic on Mission Street coming from the west (i.e. the direction of Ocean Avenue and Geneva Avenue) between 7:00 and 9:00 a.m. and from 4:00 to 5:30 p.m., so as to avoid or minimize such potential conflicts. The Monroe Elementary School, on Madrid Street (at Excelsior Avenue and Lisbon Street), is located such that project-generated construction traffic would not travel past it.

Overall, because construction activities would be temporary and limited in duration and activities are required to be conducted in accordance with City requirements, construction-related transportation of the proposed project would be *less than significant*.

Mitigation: None required.

Implementation of **Improvement Measure I-TR-2: Construction Management** would reduce *less than significant* impacts related to construction activities.

Improvement Measure I-TR-2: Construction Management

Traffic Control Plan for Construction – As an improvement measure to reduce potential conflicts between construction activities and pedestrians, transit and autos at the project site, the contractor shall add certain measures to the required traffic control plan for project construction. In addition to the requirements for a construction traffic control/management plan, the project shall include the following measures.

Limitation on Direction of Construction Traffic During Peak Hours – To minimize the construction-related disruption of the general traffic flow on adjacent streets during the AM and PM peak periods (and, specifically, to minimize any potential conflict with the nearby Mio Preschool's drop-off and pick periods), the construction contractor shall include in the Construction Management Plan methods to discourage truck movements and deliveries from arriving at the project site via Mission Street coming from the west (i.e. from the direction of Ocean Avenue and Geneva Avenue) during peak hours (generally 7:00 to 9:00 a.m. and 4:00 to 6:00 p.m., or other times, as determined by SFMTA and its Transportation Advisory Staff Committee [TASC]). The above-cited morning and afternoon peak hours of limited truck delivery direction coincide with the nearby Mio Preschool's drop-off and pick-up time periods.

Carpool and Transit Access for Construction Workers –To minimize parking demand and vehicle trips associated with construction workers, the construction contractor shall include methods to encourage carpooling and transit access to the project site by construction workers in the Construction Management Plan.

Project Construction Updates for Adjacent Businesses and Residents – To minimize construction impacts on access for nearby institutions and businesses, the Project Sponsor shall provide

nearby residences and adjacent businesses with regularly-updated information (typically in the form of website, news articles, on-site posting, mailing, etc.) regarding project construction, including a project construction contact person, construction activities, start dates, duration, peak construction activities (e.g., concrete pours), travel lane closures, and lane closures.

Overall, impacts of the proposed project related to an applicable transportation or circulation system plan or policy would be *less than significant*.

Impact TR-2: The proposed project would not result in substantially increased hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses. (Less than Significant)

The proposed project would not include any design features that would substantially increase traffic hazards (e.g., new sharp curves or dangerous intersections), and would not include any incompatible uses, as discussed above in Topic 1, Land Use and Land Use Planning. Project-related traffic would operate similar to existing traffic patterns and would not introduce any new hazardous traffic operating conditions. Therefore, the project would not have adverse impacts associated with traffic hazards. The proposed on-site structured parking would be accessible from Avalon Avenue and Silver Avenue, via driveways that would accommodate simultaneous two-way (inbound and outbound) traffic flow. The effect on traffic flow on Avalon and Silver avenues would not be substantial given how deep the two ramps to the parking spaces would be (away from the public right of way). Transportation hazards would be *less than significant*.

Impact TR-3: The proposed project would not result in inadequate emergency access. (Less than Significant)

The street network serving the project area currently accommodates the movements of emergency vehicles that travel to the project site. In the event of an emergency under project conditions, vehicles would access the project site via the Silver Avenue and Avalon Avenue access driveways. Because there would be two points of access for emergency vehicles, the proposed project's impact to emergency vehicle access would be *less than significant*.

Mitigation: None required.

Impact TR-4: The proposed project would not conflict with adopted policies, plans or programs regarding public transit, bicycle or pedestrian facilities, or otherwise decrease the performance or safety of such features. (Less than Significant)

Transit Conditions

It is anticipated that the majority of trips to and from the proposed project during the p.m. peak hour would be made by automobile, and therefore, the number of transit trips generated by the proposed project would not be substantial. As shown in **Table 2**, the proposed project would generate a total net increase of about 26 trips during the p.m. peak hour (all but three in the outbound direction away from

the project area). Assuming that distribution of transit trips would be similar to that vehicle trips, and that project transit trips would be made on the main Muni lines serving the area (14 Mission, 14R Mission Rapid, 44 O'Shaughnessy, 49 Mission-Van Ness bus lines, and the J Church Muni Metro line), there would an average increase of no more than two riders on any bus or metro train during the p.m. peak hour. That level of additional riders would not substantially increase the capacity utilization of any of the affected routes. The number of additional riders on regional transit lines due to the proposed project also would not materially increase the capacity utilization on transit lines to the East Bay, North Bay and Peninsula/South Bay, as the additional riders per bus and/or train would be dispersed to a level no higher than the above-stated two or fewer riders.

The proposed project would remove the existing driveway on Mission Street, retain the existing driveway on Silver Avenue, and add a new driveway on Avalon Avenue. The increased vehicle trips generated by the proposed project would increase the potential for conflicts between project-generated vehicles destined to the on-site parking facilities and traffic, including Muni buses, on Silver Avenue, but there is good sight distance for both traffic streams, and the peak project vehicle trips and the peak traffic hour on area roads would not coincide; the project would not result in substantial conflicts. The project would eliminate such potential conflicts on Mission Street, and because there are no Muni routes running on Avalon Avenue, the project driveway on Avalon Avenue, which would provide access to on-site parking and passenger loading, would not adversely affect Muni operations.

Because the proposed project would not substantially affect the capacity utilization of the local and regional transit lines, or affect the operations of the adjacent and nearby Muni bus routes, and project-generated vehicle trips would not substantially affect local or regional transit operations, there would be a *less-than-significant* project impact to transit conditions.

Bicycle Conditions

San Francisco Planning Code (Planning Code) Section 155 describes bicycle parking requirements for a variety of land uses.

While the proposed project is not anticipated to generate a substantial number of new bicycle trips to the area (about 22 daily bicycle trips), the proposed project proposes to comply with Planning Code requirements for bicycles as follows. It would include room for 39 bicycle parking spaces (25 Class 1 spaces in the parking garage within Building 1A, and 14 Class 2 spaces spread among three bicycle racks on the Jewish Home grounds). The majority of roadways in proximity to the project site are not City-designated bicycle routes, with the exception of Silver Avenue (Route 70) and Alemany Boulevard (Route 45). Based on field observations (in May 2012 and September 2014), the volume of bicyclists in the project site vicinity during the weekday p.m. peak period is relatively low. It is estimated that the project would generate about three bicycle trips during the p.m. peak hour. That level of bicyclists added to the current level of bicycle activity would neither substantially affect current bicycle flow conditions, nor result in potentially hazardous bicycle conditions, and therefore, would have a *less-than-significant* bicycle impact.

Pedestrian Conditions

Based on field observations conducted during the weekday p.m. peak period (in May 2012 and September 2014), the volume of pedestrians on sidewalks in the project site vicinity is low to moderate (i.e., activity levels typically found in residential settings). Area sidewalks are adequate in width to accommodate existing pedestrian circulation. Pedestrian counts conducted for crosswalks at the study intersections during the p.m. peak hour show that the hourly pedestrian volumes were generally fewer than 100 pedestrians per hour total on all crosswalks. However, there were about 700 pedestrians per hour at the Mission Street / Silver Avenue intersection (with the majority of pedestrian crossings tied to the multi-line bus stops on Mission Street south of Silver Avenue and on Silver Avenue east of Mission Street), and about 300 pedestrians per hour at the Mission Street / Avalon Avenue-Theresa Street intersection (with the majority of pedestrians on Mission Street crossing Avalon Avenue and Theresa Street). Despite the relatively high pedestrian volumes at the latter two intersections, the crosswalks were observed to have adequate width to accommodate existing pedestrian circulation.

Portions of the project site's Avalon Avenue and Mission Street frontages would be improved in a manner consistent with the City's Better Streets Plan, including some combination of wider sidewalks, bulbouts, and street trees, as described in the Project Description. The curb cuts, extensions, bulbout, loading zone, and Lisbon Street parking changes would require SFDPW approval.

The Monroe Elementary School is located at 260 Madrid Street (at Excelsior Avenue and Lisbon Street). The intersections through which students walk to and from this school are all controlled with stop signs on all approaches, and have yellow-striped crosswalks. There is no expectation that the proposed project would generate vehicle trips past the school.

A pedestrian entrance to the proposed project would be from Mission Street, with other pedestrian access from Silver Avenue and Avalon Avenue. Generally, pedestrian trips associated with the project site would be by people who walk locally to and from the project site, or between their off-site (on-street) parking spaces or nearby transit stops and the project site. As shown in Table 2, it is estimated that the project would generate about 47 new pedestrian trips (walk only plus walk to/from transit stop) during the p.m. peak hour. Because those added pedestrians would be dispersed over different sidewalks and crosswalks, and because of the adequate sidewalk widths and pedestrian countdown signals for crosswalks, the proposed project would neither substantially affect current pedestrian flow conditions, nor result in potentially hazardous pedestrian conditions, and therefore, would have a *less-than-significant* pedestrian impact.

Impact C-TR-1: The proposed project, in combination with past, present, and reasonably foreseeable future projects, would not result in a cumulatively considerable contribution to significant transportation impacts. (Less than Significant)

Traffic

The Cumulative 2040 traffic volumes in the project study area are based on expected annual traffic growth rates between 2010 and 2040 derived from the San Francisco County Transportation Authority (SFCTA)

countywide travel demand forecasting model (SFCTA CHAMP Model). The SFCTA model output takes into account expected growth in housing and employment for San Francisco and the nine-county Bay Area.

Cumulative traffic operating conditions at the seven study intersections are shown in **Table 4**. Under 2040 traffic conditions, all except two of the study intersections would operate at an acceptable level of service (LOS D or better) for the weekday p.m. peak hour. The signalized intersection of Alemany Boulevard and Silver Avenue would operate at LOS E, to which the proposed project would add one vehicle trip to the southbound critical through movement that would operate at LOS F, which represent a less than 0.1-percent contribution to this critical movement. The project would add trips to the other (westbound left-turn) critical movement at the Alemany/Silver intersection, but that movement would operate at an acceptable LOS C, and therefore, the proposed project's contribution to the 2040 Cumulative operating conditions would be considered *less than significant*.

TABLE 4
PROJECT AREA INTERSECTION OPERATING CONDITIONS DURING EXISTING,
EXISTING PLUS PROJECT, AND 2040 CUMULATIVE WEEKDAY PM PEAK-HOUR CONDITIONS^a

Intersection	Existing Conditions		Existing Plus Project		Cumulative (2040) Conditions ^b	
	LOS	Delay	LOS	Delay	LOS	Delay
Signalized ^c						
1. Mission Street / Silver Avenue	B	14.2	C	22.1	D	37.1
2. Mission Street / Avalon Avenue-Theresa Street	A	9.4	A	9.3	D	47.3
6. Alemany Boulevard / Silver Avenue	C	26.5	C	27.0	E	77.0
	v/c ratio = 0.73		v/c ratio = 0.75		v/c ratio = 0.94	
Unsignalized ^d						
3. Avalon Avenue / Lisbon Street (AWSC) Worst Approach ^c :	A	9.0	A	9.1	A	9.2
	Eastbound		Eastbound		Eastbound	
4. Silver Avenue / Lisbon Street (AWSC) Worst Approach ^c :	B	12.6	B	12.7	C	15.7
	Westbound		Westbound		Westbound	
5. Alemany Boulevard / Theresa Street (SSSC) Worst Approach ^c :	E	42.8	E	44.0	F	>80
	Eastbound		Eastbound		Eastbound	
7. Avalon Avenue / London Street (SSSC) Worst Approach ^c :	B	11.8	B	11.8	B	12.3
	Northbound		Northbound		Northbound	

^a LOS were determined using the analysis methodologies in the 2000 *Highway Capacity Manual*.

^b Cumulative volumes were derived on the basis of information about traffic growth patterns, which used the San Francisco County Transportation Authority countywide travel demand forecasting model, taking into account the development anticipated in the vicinity of the project, plus the expected growth in housing and employment for the remainder of San Francisco and the nine-county Bay Area.

^c The LOS and delay (in seconds) for signalized intersections represent conditions for the overall intersection.

^d The LOS and delay for unsignalized intersections represent conditions for the worst (most congested) approach, with the worst approach identified (e.g., Eastbound for Intersection 3).

SOURCE: ESA 2015.

In addition, the side-street stop-controlled (Theresa Street) approaches to the unsignalized intersection of Alemany Boulevard / Theresa Street, to which the proposed project would add five vehicle trips, would operate at LOS F during the weekday p.m. peak hour. However, the intersection would not meet Caltrans Traffic Signal Warrant 3 (Peak Hour) in 2040, and therefore, the cumulative impact would be *less than significant*.

Transit, Pedestrians, and Bicycles

As indicated above, the proposed project would generate about 26 transit trips during the weekday p.m. peak hour (all but three in the outbound direction away from the project area, and no more than about two added riders on any individual bus or light rail train). By 2040, the Mission and San Bruno/Bayshore sub-corridors within the Southeast screenline are projected to operate above the Muni 85-percent utilization standard in the peak (outbound from downtown) direction during the p.m. peak hour, at 88.9 percent and 85.1 percent, respectively. The screenline as a whole would operate at 65 percent. The proposed project's contribution (no more than about two added riders per bus or light rail train) to the sub-corridor ridership levels, and to the Southeast screenline as a whole, would be negligible. Based on these findings, the new transit trips associated with the proposed project would not result in overcrowding conditions nor would the proposed project result in a cumulatively considerable contribution to future ridership levels along these transit lines. For the above reasons, the proposed project, in combination with past, present and reasonably foreseeable development in San Francisco, would result in *less-than-significant* cumulative transit impacts.

The proposed project would generate about 47 pedestrian trips during the p.m. peak hour, generally by people who walk locally to the project site, or between their off-site (on-street) parking spaces or nearby transit stops and the project site. Pedestrian trips in the area may increase between the completion of the proposed project and the cumulative scenario due to possible increased development in the area, but the area is generally built-out. The proposed project would not result in overcrowding on public sidewalks, interfere with pedestrian circulation and circulation to nearby areas and buildings, or create potentially hazardous conditions for pedestrians under existing or cumulative conditions.

There is a projected increase in vehicle traffic between Existing plus Project and 2040 Cumulative conditions, as shown in the cumulative traffic forecasts. This would result in an increase in the potential for vehicle-pedestrian conflicts at intersections in the study area. While there would be a general increase in vehicle traffic through the future 2040 Cumulative conditions, the proposed project would not create potentially hazardous conditions for pedestrians, or otherwise interfere with pedestrian accessibility to the site and adjoining areas. For the above reasons, the proposed project, in combination with past, present and reasonably foreseeable development in San Francisco, would result in *less-than-significant* cumulative pedestrian impacts.

Bicycling trips in the area may increase between the completion of the proposed project and the cumulative scenario due to possible increased development in the area, but the area is generally built-out. There are no bicycle improvement projects planned (in the *San Francisco Bicycle Plan*) in or near the project site.

Also, as noted above, under 2040 Cumulative conditions, there is a projected increase in vehicles at intersections in the vicinity of the proposed project that may result in an increase in vehicle-bicycle conflicts at intersections and driveways in the study area. While there would be a general increase in vehicle traffic that is expected through the future 2040 Cumulative conditions, the proposed project would not create potentially hazardous conditions for bicycles, or otherwise interfere with bicycle accessibility to the site and adjoining areas, or substantially affect the nearby Class II and Class III bicycle routes on Alemany Boulevard and Silver Avenue, respectively.

The project would not result in overcrowding on nearby bicycle routes, interfere with bicycle circulation, or create potentially hazardous conditions for bicycles. Considering the proposed project, cumulatively with past, present, and reasonably foreseeable future projects and growth throughout the City, the cumulative effects of the proposed project would not result in hazardous conditions for bicyclists or otherwise interfere with bicycle facilities or accessibility. For the above reasons, the project, in combination with past, present and reasonably foreseeable development in San Francisco, would result in **less-than-significant** cumulative bicycle impacts.

For the above reasons, the proposed project, in combination with past, present and reasonably foreseeable development in San Francisco, would result in *less-than-significant* cumulative transit, pedestrian, and bicycle impacts.

Parking

Public Resources Code Section 21099(d), effective January 1, 2014, provides that, “aesthetics and parking impacts of a residential, mixed-use residential, or employment center project on an infill site located within a transit priority area shall not be considered significant impacts on the environment.” Accordingly, aesthetics and parking are no longer to be considered in determining if a project has the potential to result in significant environmental effects for projects that meet all of the following three criteria:

- a) The project is in a transit priority area; and
- 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 three criteria, and thus, the adequacy of parking in determining the significance of project impacts under CEQA would not be considered.⁴⁷

Parking conditions are not static, as parking supply and demand varies from day to day, from day to night, from month to month, etc. Hence, the availability of parking spaces (or lack thereof) is not a permanent physical condition, but changes over time as people change their modes and patterns of travel.

⁴⁷ Transit-Oriented Infill Project Eligibility Checklist for 302 Silver Avenue, October 23, 2014. This document is on file and available for public review at the San Francisco Planning Department, 1650 Mission Street, Suite 400, as part of Case File No. 2013.1543E.

The absence of a ready supply of parking spaces, combined with available alternatives to auto travel (e.g., transit service, taxis, bicycles or travel by foot) and a relatively dense pattern of urban development, induces many drivers to seek and find alternative parking facilities, shift to other modes of travel, or change their overall travel habits. Any such resulting shifts to transit service or other modes (walking and biking), would be in keeping with the City's Transit First Policy and numerous San Francisco General Plan Policies, including those in the Transportation Element. The City's Transit First Policy, established in the City's Charter Article 8A, Section 8A, Section 115, provides that "parking policies for areas well served by public transit shall be designed to encourage travel by public transportation and alternative transportation."

The transportation analysis accounts for potential secondary effects, such as cars circling and looking for a parking space in areas of limited parking supply, by assuming that all drivers would attempt to find parking at or near the project site and then seek parking farther away if more convenient parking is unavailable. The secondary effects of drivers searching for parking is typically offset by a reduction in vehicle trips due to others who are aware of constrained parking conditions in a given area, and thus choose to reach their destination by other modes (i.e., walking, biking, transit, taxi). If this occurs, any secondary environmental impacts that may result from a shortfall in parking in the vicinity of the proposed project would be minor, and the traffic assignments used in the transportation analysis, as well as in the associated air quality, noise and pedestrian safety analyses, would reasonably address potential secondary effects.

Planning Code Requirement: *San Francisco Planning Code (Planning Code)* Sections 151 and 151.1 describes the off-street parking requirements for a variety of land uses. As stated above, the project sponsor has requested an SUD to update the *Planning Code* definition of "residential care facility" to reflect contemporary standards for RCFE facilities, incorporate The Square, and address other Code compliance issues. The SUD would authorize 224 spaces for the site.

Proposed Project Parking Supply and Demand: The project would increase the on-site parking supply from the existing 166 spaces to 224 spaces (a net increase of 58 spaces), of which 93 spaces would be in a surface parking area, and 131 spaces would be in underground structured parking. Up to an additional 50 spaces could be available through valet parking (in the surface parking lot and proposed underground parking garage) during major events at the Jewish Home such as Board Meetings and holiday events. The application materials include a draft TDM program and other materials supporting the proposed increase of 58 parking spaces, which is designed to avoid net new increases in off-site parking demand.

As described in the project description, the Home would host special events, including Board Meetings, approximately twice per month. Through the Home's programing, these events would likely occur outside of morning and evening peak periods. The proposed project's operations would include valet service to accommodate the parking demand during the Home's special events. With valet parking service, the surface parking lot and/or proposed underground parking garage could be arranged to accommodate approximately 50 additional on-site parking spaces.

The proposed project would have a total peak parking demand of about 357 spaces (at about 3:00 p.m.), with lower demand during evening hours.⁴⁸ This peak parking demand would not be accommodated within the off-street parking supply of 224 parking spaces, which would result in a shortfall of 133 spaces during the mid-afternoon hours. However, the lower parking demand during the evening hours (when parking demand for residents in the surrounding neighborhood occurs) would continue to be fully accommodated within the on-site parking supply. In addition, the proposed retail use would be primarily neighborhood-serving and well-served by transit. There would likely be more walking and transit trips. Therefore, the parking shortfall is not likely to be severe as stated above.

A 2011 parking analysis revealed that Jewish Home's peak parking demand for on-street parking spaces was 133 spaces (at about 3:00 p.m.), and there is no evidence that the current demand for on-street parking spaces has changed. Therefore, the above-cited parking deficit (i.e., demand for 133 on-street parking spaces) would be no higher than currently exists. The estimated parking shortfall would increase neither potential hazardous conditions nor delays affecting traffic, transit, bicycles or pedestrians, and would not render use of other modes infeasible.⁴⁹

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less-Than- Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
5. NOISE—Would the project:					
a) Result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐	☐
b) Result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐	☐
c) Result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☒	☐	☐
d) Result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☒	☐	☐	☐
e) For a project located within an airport land use plan area, or, where such a plan has not been adopted, in an area within two miles of a public airport or public use airport, would the project expose people residing or working in the area to excessive noise levels?	☐	☐	☐	☐	☒

⁴⁸ Parking surveys conducted in 2011 (by Fehr and Peers) revealed that Jewish Home-generated parking demand peaks at 3:00 p.m., with spillover onto surrounding streets, and declines after 3:00 p.m. to a point where it is about half of the peak demand during evening hours (5:00 p.m. and later), fully accommodated with on-site parking spaces. There is no evidence that that relationship between the facility's parking demand at its peak and during evening hours has changed.

⁴⁹ As stated previously, contingent upon approval by SFDPW, SFMTA and the Board, the parallel on-street parking spaces at the eastern edge of the Home's campus on Lisbon Street would be converted to diagonal parking, which would result in a net increase of 10 to 15 new on-street parking spaces on that street. That increase would be offset by an articulated bus zone on Mission Street, the new curb cut across from London Street, and a designated yellow-curb loading space on Mission Street, and the project would result in a total net increase of about 2 on-street parking spaces.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less-Than- Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
5. NOISE (continued)					
f) For a project located in the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☐	☒
g) Be substantially affected by existing noise levels?	☐	☐	☒	☐	☐

The project site is not within an airport land use plan area, nor is it in the vicinity of a private airstrip. Therefore, topics 5e and 5f are not applicable.

Setting

Overview

Sound is mechanical energy transmitted by pressure waves through a medium such as air. Noise is defined as unwanted sound. Sound is characterized by various parameters that include the rate of oscillation of sound waves (frequency), the speed of propagation, and the pressure level or energy content (amplitude). In particular, the sound pressure level has become the most common descriptor used to characterize the loudness of an ambient sound level. Sound pressure level is measured in decibels (dB), with zero dB corresponding roughly to the threshold of human hearing, and 120 to 140 dB corresponding to the threshold of pain.

Sound pressure fluctuations can be measured in units of hertz (Hz), which correspond to the frequency of a particular sound. Typically, sound does not consist of a single frequency, but rather a broad band of frequencies varying in levels of magnitude (sound power). The typical human ear is not equally sensitive to all frequencies of the audible sound spectrum. As a consequence, when assessing potential noise impacts, sound is measured using an electronic filter that de-emphasizes the frequencies below 1,000 Hz and above 5,000 Hz in a manner corresponding to the human ear's decreased sensitivity to low and extremely high frequencies. This method of frequency weighting is referred to as A-weighting and is expressed in units of A-weighted decibels (dBA).⁵⁰ Frequency A-weighting follows an international standard methodology of frequency de-emphasis and is typically applied to community noise measurements.

Noise and Community Exposure

An individual's noise exposure is a measure of the noise experienced by the individual over a period of time. A noise level is a measure of noise at a given instant in time; however, noise levels rarely persist consistently over a long period of time. Rather, community noise varies continuously over time because of the contributing sound sources of the community noise environment. Community noise is primarily the product of many distant noise sources, which constitute a relatively stable background noise, with the individual contributors unidentifiable. The background noise level changes throughout a typical day, but

⁵⁰ All noise levels reported herein reflect A-weighted decibels unless otherwise stated.

typically does so gradually, corresponding with the addition and subtraction of distant noise sources such as traffic and wind. What makes community noise constantly variable throughout a day, besides the slowly changing background noise, is the addition of short duration single event noise sources (e.g., aircraft flyovers, motor vehicles, sirens), which are readily identifiable to the individual.

These successive additions of sound to the community noise environment result in variation in the community noise level from instant to instant, requiring the measurement of noise exposure over a period of time to accurately characterize a community noise environment and evaluate cumulative noise impacts. This time-varying characteristic of environmental noise is described using statistical noise descriptors. The most frequently used noise descriptors are summarized below:

- L_{eq}:** The equivalent sound level is used to describe noise over a specified period of time, typically one hour, in terms of a single numerical value. The L_{eq} is the constant sound level that would contain the same acoustic energy as the varying sound level, during the same time period (i.e., the average noise exposure level for the given time period).
- L_{max}:** The instantaneous maximum noise level for a specified period of time.
- L₅₀:** The noise level that is equaled or exceeded 50 percent of the specified time. This is the median noise level during the specified time.
- L₉₀:** The noise level that is equaled or exceeded 90 percent of the specified time. The L₉₀ is often considered the background noise level averaged over the specified time.
- DNL:** The Day/Night Average Sound Level is the 24-hour day and night A-weighted noise exposure level, which accounts for the greater sensitivity of most people to nighttime noise by weighting noise levels at night. Noise between 10:00 p.m. and 7:00 a.m. is weighted (penalized) by adding 10 dBA to take into account the greater annoyance from nighttime noise. (DNL is also referred to as "L_{dn}.")
- CNEL:** Similar to the DNL, the Community Noise Equivalent Level (CNEL) adds a 5-dBA "penalty" for the evening hours between 7:00 p.m. and 10:00 p.m. in addition to a 10-dBA penalty between the hours of 10:00 p.m. and 7:00 a.m.

Effects of Noise on People

The effects of noise on people can be placed into three categories:

- Subjective effects of annoyance, nuisance, dissatisfaction;
- Interference with activities such as speech, sleep, learning; and
- Physiological effects such as hearing loss or sudden startling.

Environmental noise typically produces effects in the first two categories. Workers in industrial plants generally experience noise in the last category. There is no completely satisfactory way to measure the subjective effects of noise, or the corresponding reactions of annoyance and dissatisfaction. A wide variation exists in the individual thresholds of annoyance, and different tolerances to noise tend to develop based on an individual's past experiences with noise.

Thus, an important way of predicting a human reaction to a new noise environment is the way it compares to the existing environment to which one has adapted: the so called ambient noise level. In general, the more a new noise exceeds the previously existing ambient noise level, the less acceptable the new noise will be judged by those hearing it. With regard to increases in A-weighted noise level, the following relationships occur:

- Under controlled conditions in an acoustics laboratory, the trained healthy human ear is able to discern changes in sound levels of 1 dBA;
- Outside these controlled conditions, the trained ear can detect changes of 2 dBA in normal environmental noise;
- It is widely accepted that the average healthy ear, however, can barely perceive changes in the noise level of 3 dBA;
- A change in level of 5 dBA is a readily perceptible increase in noise level; and
- A 10 dBA change is recognized as twice as loud as the original source (Caltrans, 2009).

These relationships occur in part because of the logarithmic nature of sound and the decibel system. The human ear perceives sound in a non-linear fashion; hence the decibel scale was developed. Because the decibel scale is based on logarithms, two noise sources do not combine in a simple additive fashion, rather logarithmically. For example, if two identical noise sources produce noise levels of 50 dBA, the combined sound level would be 53 dBA, not 100 dBA.

Noise Attenuation

Stationary point sources of noise, including stationary mobile sources such as idling vehicles, attenuate (lessen) at a rate of 6 to 7.5 dBA per doubling of distance from the source, depending on the topography of the area and environmental conditions (i.e., atmospheric conditions and noise barriers, either vegetative or manufactured, etc.). Widely distributed noise, such as a large industrial facility spread over many acres or a street with moving vehicles (known as a “line” source), would typically attenuate at a lower rate, approximately 3 to 4.5 dBA each time the distance doubles from the source, which also depends on environmental conditions (Caltrans, 2009). Noise from large construction sites would exhibit characteristics of both “point” and “line” sources, and attenuation will therefore generally range between 4.5 and 7.5 dBA each time the distance doubles.

Sources of Noise

Transportation sources, such as automobiles, trucks, trains, and aircraft, are the principal sources of noise in the urban environment. Along major transportation corridors, noise levels can reach 80 DNL, while along arterial streets, noise levels typically range from 65 to 70 DNL. However, noise levels on roadways, like all areas, can be affected by intervening development, topography, or landscaping.

Existing noise environment at the project is primarily influenced by traffic on the surrounding streets as is typical of urban areas. According to the San Francisco Planning Department and Department of Public Health, the primary source of noise in the neighborhood is vehicular traffic on I-280. Noise levels along and

adjacent to the highway are above 70 dBA Ldn. Noise levels along Mission Street, Silver Avenue, and Avalon Avenue are above 70 dBA Ldn. Noise levels along Lisbon Street are between 65 and 70 dBA Ldn.⁵¹

Operation of industrial and commercial equipment and temporary construction activities also contribute to the ambient noise environment in their vicinities. No industrial equipment is present in the project site vicinity.

Sensitive Receptors

Some land uses are considered more sensitive to ambient noise levels than others because of the amount of noise exposure, in terms of both duration and insulation from noise, and the types of activities typically involved. Residences, motels and hotels, schools, libraries, churches, hospitals, nursing homes, auditoriums, and parks and other outdoor recreation areas generally are more sensitive to noise than are commercial and industrial land uses. The project site is surrounded on three sides (Lisbon Street, Silver and Avalon Avenues) by predominantly single-family residential uses, which would be considered sensitive receptors. Nearby uses on Mission Street are varied, and include commercial, residential, and mixed-use buildings, a branch library, and a house of worship. The residential, library, and house of worship are considered sensitive receptors. On-site residential uses, which house the elderly and infirm, are also considered sensitive receptors.

Regulatory Setting

The proposed project could expose persons to noise levels in excess of established noise standards in two ways: 1) it could introduce sensitive receptors to a noise environment that is incompatible for the proposed uses or 2) it could generate noise levels that could result in the exposure of existing noise sensitive receptors on and around the project site to levels above established standards or thresholds. The noise standards applicable to the project site are discussed below, followed by impact analyses as they apply to the construction and operation of the proposed project.

San Francisco General Plan

The Environmental Protection Element of the *San Francisco General Plan* contains the following objectives and policies relevant to noise and new development:⁵²

Objective 10: Minimize the impact of noise on affected areas.

Policy 10.1: Promote site planning, building orientation and design, and interior layout that will lessen noise intrusion.

Policy 10.2: Promote the incorporation of noise insulation materials in new construction.

Objective 11: Promote land uses that are compatible with various transportation noise levels.

⁵¹ City and County of San Francisco Planning Department, Department of Public Health, *Areas Potentially Requiring Noise Insulations*, available online: http://www.sf-planning.org/ftp/files/publications_reports/library_of_cartography/Noise.pdf, March 2009.

⁵² *San Francisco General Plan*, Environmental Protection Element, Policy 11.1

Policy 11.1: Discourage new uses in areas in which the noise level exceeds the noise compatibility guidelines for that use. The Land Use Compatibility Chart for Community Noise included in Policy 11.1 specifies the compatibility of different land use types within a range of ambient noise levels.

For residential uses:

- Noise exposure is considered satisfactory, with no special noise insulation requirements where the DNL is 60 dBA or less.
- New construction or development should be undertaken only after a detailed analysis of noise reduction requirements is made and needed noise insulation features included in the design where the DNL is between 60 dBA and 70 dBA.
- New construction or development should generally be discouraged where DNL is over 65 dBA.

For other noise-sensitive uses (i.e., schools, libraries, churches, hospitals, nursing homes):

- Noise exposure is considered satisfactory, with no special noise insulation requirements where the DNL is 65 dBA or less.
- New construction or development should be undertaken only after a detailed analysis of noise reduction requirements is made and needed noise insulation features included in the design where the DNL is between 62 dBA and 70 dBA.
- New construction or development should generally not be undertaken where DNL is more than 65 dBA.

For playgrounds, parks and similar outdoor uses, noise exposure is considered satisfactory, where the DNL is 70 dBA or less

Policy 11.3: Locate new noise-generating development so that the noise impact is reduced.

San Francisco Noise Ordinance (Article 29, San Francisco Police Code)

The Noise Ordinance specifically recognizes that adverse effects on a community can arise from noise sources, such as transportation, construction, mechanical equipment, entertainment, and human and animal behavior. The San Francisco Noise Ordinance (Article 29, *San Francisco Police Code*, Section 2900) states:

It shall be the policy of San Francisco to maintain noise levels in areas with existing healthful and acceptable levels of noise and to reduce noise levels, through all practicable means, in those areas of San Francisco where noise levels are above acceptable levels as defined by the World Health Organization's Guidelines on Community Noise.

The following Noise Ordinance provisions address and limit disruptive noise intrusions.

Construction Noise (Sections 2907 and 2908). The Noise Ordinance states that construction equipment shall not emit noise in excess of 80 dBA when measured at a distance of 100 feet, or at an equivalent sound level at some other convenient distance. This noise level limit is not applicable to impact tools and equipment that contain manufacturer-recommended noise-attenuating intake and exhaust mufflers, or to pavement breakers and jackhammers equipped with manufacturer-recommended acoustically attenuating shields or shrouds, approved by the DPW or DBI.

Fixed Source Noise Limits (Section 2909). Section 2909 establishes a not-to-exceed noise standard for fixed sources of noise, such as building mechanical equipment and industrial or commercial processing machinery. The standards in Section 2909(a), (b), and (c) are applicable outdoors, at the property line of the affected use, and vary based on the residential or commercial nature of the noise generator's use. For residential properties, the noise limits are 5 dBA above the ambient level at any point outside of the property plane of a residential use. The noise limits for public property provide that no person shall produce a noise level more than 10 dBA above the local ambient level at a distance of 25 feet or more on public property.

The Noise Ordinance also limits interior noise from a fixed source (e.g., machinery, mechanical equipment) from causing the noise level measured inside any sleeping or living room in any dwelling unit located on residential property to 45 dBA between the hours of 10:00 p.m. to 7:00 a.m. or 55 dBA between the hours of 7:00 a.m. to 10:00 p.m. with windows open, except where building ventilation is achieved through mechanical systems that allow windows to remain closed.

Impact NO-1: Implementation of the proposed project would not expose persons to noise levels in excess of standards in the *San Francisco General Plan* and Noise Ordinance (Article 29 of the *Police Code*) by introducing a land use that is incompatible with the existing noise environment at the site. (Less than Significant)

This impact evaluates noise effects related to introduction of the proposed project's uses. The proposed project would represent an intensification of an existing use and would not constitute a new use, although it would introduce new residents to the campus. As under existing conditions, the proposed project would be generally compatible with the surrounding noise environment. To characterize the existing noise levels in the vicinity of the project site, one long term (48-hour) ambient noise measurement was taken on Avalon Avenue about 100 feet from its intersection with Mission Street. The recorded DNL at this location over the 48 hour period was 61.1 dBA. This represents noise levels along the project site frontages but noise levels at the interior of the site (away from street frontages) are expected to be below 60 dBA, DNL. As is the case with most urban environments, noise from traffic on the surrounding roadway network and operation of stationary sources such as HVAC equipment in nearby buildings primarily contributed to this noise level,

In noise environments of up to 70 dBA DNL, normal conventional construction is usually sufficient to achieve acceptable interior noise levels. Since noise levels do not exceed 70 dBA DNL along site frontages, additional noise insulation features, beyond conventional construction features, would not be required. Compliance with the *California Building Standards Code* (Title 24 of the *California Code of Regulations*) and applicable *San Francisco Building Code* requirements would suffice to ensure acceptable interior noise levels. Therefore, the proposed project would be compatible with the noise environment, and this impact would be *less than significant*.

Mitigation: None required.

Impact NO-2: Construction activities associated with the proposed project would result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project and expose persons to or generate noise levels in excess of standards in the *San Francisco General Plan* and Noise Ordinance (Article 29 of the *Police Code*). (Less than Significant with Mitigation)

This impact evaluates the potential noise effects associated with construction of the proposed project. Noise impacts from construction generally result when construction activities occur during the noise-sensitive times of the day (early morning, evening, or nighttime hours), in areas immediately adjacent to noise-sensitive receptors (primarily residential uses), or when construction noise lasts over extended periods of time.

The San Francisco Noise Ordinance (Article 29 of the *San Francisco Police Code*) regulates construction-related noise. Section 2907 limits noise levels from individual pieces of equipment to 80 dBA at 100 feet, which is equivalent to 86 dBA at 50 feet. Impact tools, such as jackhammers and pile drivers, are exempt from this noise limit if they are equipped with intake and exhaust mufflers approved by the Director of Public Works. Construction hours are restricted to the hours between 7:00 a.m. and 8:00 p.m. However, Section 2908 allows for construction work during nighttime hours (defined by the *Code* as 8:00 p.m. to 7:00 a.m.) as long as construction-related noise does not exceed the ambient noise level by 5 dBA at the nearest property line or unless a special permit is granted by the Director of Public Works.

Noise levels from construction activity at and near the project site would fluctuate depending on the particular type, number, and duration of use of various pieces of construction equipment. Construction-related vehicle trips would raise ambient noise levels along haul routes, depending on the number of haul trips made and types of vehicles used. **Table 5** shows typical noise levels produced by various types of construction equipment at 50 feet and 100 feet without the incorporation of acoustic shields or shrouds, or other noise-reduction measures. Project construction would not require pile driving.

Project construction is proposed to occur between the hours of 7:00 a.m. and 8:00 p.m., as required by Article 29 of the *Police Code*. No construction is proposed to occur on weekends and legal holidays.

The closest off-site sensitive receptors to the project site are the residences along Avalon Avenue located across the street from the project site, as well as the Mio Preschool across Avalon Avenue at Mission Street. These residences and school are as close as 100 feet from where construction activities are proposed to occur. At this distance, the maximum noise level of 89 dBA would attenuate to 83 dBA. Although not all noise-generating equipment would be operating at the same time, and although erected structural elements (such as building walls) would dampen the construction noise, noise generated by construction equipment would be above the levels specified by Section 2907 of the *San Francisco Police Code*. Existing buildings on the project site also house residents and these residents would be most affected during project construction. Project construction would take place in very close proximity to the Rosenberg and Goodman Buildings. Without the use of acoustic shields or shrouds, or other noise-reduction measures, construction could result in a substantial temporary increase in ambient noise levels in the project vicinity above existing conditions, which were monitored to be 60–61 dBA during daytime hours, resulting in a significant impact. Consequently, **Mitigation Measure NO-2** is identified to reduce

TABLE 5
TYPICAL NOISE LEVELS FROM CONSTRUCTION EQUIPMENT

Construction Equipment	Noise Level (dB, Leq at 50 feet)	Noise Level (dB, Leq at 100 feet)	Additional Noise Control needed?
Air Compressor	81	75	No
Backhoe	80	74	No
Concrete Mixer (Truck)	85	79	No
Concrete Mixer (Pump)	82	76	No
Crane, Derrick	88	82	Yes
Crane, Mobile	83	77	No
Dozer	85	79	No
Excavator	81	75	No
Generator	81	75	No
Grader	85	79	No
Jack Hammer	88	82	Yes
Loader	85	79	No
Paver	89	83	Yes
Pneumatic Tool	85	79	No
Roller	74	68	No
Saw	76	70	No

SOURCE: FTA, 2006.

NOTE: *San Francisco Police Code* Section 2907 limits noise levels from individual pieces of equipment to 80 dBA at 100 feet, v equivalent to 86 dBA at 50 feet.

construction noise levels. Because construction activities would occur during the daytime and involve standard construction equipment, implementation of these noise-reducing mitigations would be sufficient to reduce this impact to less than significant with mitigation.

Mitigation Measure NO-2: General Construction Noise Control Measures.

To ensure that the noise from project construction activities is minimized to the maximum extent feasible, the project sponsor shall undertake the following:

- The project sponsor shall require the general contractor to ensure that equipment and trucks used for project construction utilize the best available noise control techniques (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures and acoustically-attenuating shields or shrouds, wherever feasible).
- The project sponsor shall require the general contractor to locate stationary noise sources (such as compressors) as far from adjacent or nearby sensitive receptors as possible, to muffle such noise sources, and to construct barriers around such sources and/or the construction site, which could reduce construction noise by as much as five dBA. To further reduce noise, the contractor shall locate stationary equipment in pit areas or excavated areas, if feasible.
- The project sponsor shall require the general contractor to use impact tools (e.g., jack hammers, pavement breakers, and rock drills) that are hydraulically or electrically powered wherever possible to avoid noise associated with compressed air exhaust from pneumatically powered

tools. Where use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust shall be used, along with external noise jackets on the tools, which could reduce noise levels by as much as 10 dBA.

- The project sponsor shall include noise control requirements in specifications provided to construction contractors. Such requirements could include, but not be limited to, performing all work in a manner that minimizes noise to the extent feasible; use of equipment with effective mufflers; undertaking the most noisy activities during times of least disturbance to surrounding residents and occupants, as feasible; and selecting haul routes that avoid residential buildings inasmuch as such routes are otherwise feasible.
- Prior to the issuance of each building permit, along with the submission of construction documents, the project sponsor shall submit to the Planning Department and Department of Building Inspection (DBI) a list of measures to respond to and track complaints pertaining to construction noise. These measures shall include (1) a procedure and phone numbers for notifying DBI, the Department of Public Health, and the Police Department (during regular construction hours and off-hours); (2) signs posted along all frontages of the project site describing noise complaint procedures and a complaint hotline number that shall be answered at all times during construction; (3) designation of an on-site construction complaint and enforcement manager for the project; and (4) notification of neighboring residents and non-residential building managers within 300 feet of the project construction area at least 30 days in advance of extreme noise generating activities (defined as activities generating noise levels of 90 dBA or greater) about the estimated duration of the activity.

Impact NO-3: Operation of the proposed project would not result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project. (Less than Significant)

This impact evaluates the potential noise effects associated with operation of the proposed project. The proposed project is located in an urban area where the sound of vehicular traffic (autos, trucks, buses) on local streets dominates the existing ambient noise environment. Operation of the proposed project could increase ambient noise levels in the project vicinity, primarily through the on-site use of stationary equipment and off-site increase in traffic associated with activities of the expanded Jewish Home.

Mechanical equipment, such as heating and ventilation systems installed at the new buildings would be similar to those currently used at other buildings on the project site and would not be expected to result in a substantial, if any, increase in ambient noise levels in the project vicinity. These sources would be subject to Section 2909 of the Noise Ordinance, which establishes noise limits for mechanical equipment. Under Section 2909, stationary sources are not permitted to result in noise levels that exceed the existing ambient noise level by more than 10 dBA on public property (i.e., in the public right-of-way) and 5 dBA on residential property, at a distance of 25 feet or more. Required compliance with the Noise Ordinance would ensure that project-related noise increase associated with stationary equipment is maintained at acceptable levels resulting in a *less than significant* impact at nearby residential receptors.

Increase in traffic as a result of the project would result in noise increases along local streets. In general, traffic noise increase of less than 3 dBA is barely perceptible to people, while a 5-dBA increase is readily

noticeable.⁵³ Therefore, permanent increases in ambient noise levels of less than 3 dBA are typically considered to be less than significant. Generally, traffic volumes on area streets would have to approximately double for the resulting traffic noise levels to increase by 3 dBA. As described under Topic 4, Transportation and Circulation, the proposed project would generate approximately 83 p.m. peak-hour vehicle trips. This increase in vehicle trips would not cause traffic volumes to double on area streets, and therefore would not have a noticeable effect on ambient noise levels in the project site vicinity. The project also would not contribute to any potential cumulative traffic noise effects. The impact of the operation of the project on the ambient noise level would therefore be *less than significant*.

Mitigation: None required.

Impact NO-4: The proposed project would result in exposure of persons to or generation of excessive groundborne noise or groundborne vibration levels during construction or operation of the project. (Less than Significant with Mitigation)

Construction activities generate both groundborne noise and vibration, especially during groundbreaking activities such as excavation, pile driving, trenching and jack hammering. Even where vibration levels are low or imperceptible, vibrations can nonetheless produce ground-borne noise. Groundborne noise and vibration can cause impacts to people (disturbance and annoyance), buildings (structural or architectural damage) and to vibration sensitive equipment located within affected buildings.

Although the perceptibility threshold for ground-borne vibration is about 65 vibration decibels (VdB), human response to vibration is not usually substantial unless the vibration exceeds 70 VdB. In terms of vibration during construction, vibration is described in Peak Particle Velocity (PPV) based on FTA guidelines. PPV relates to the maximum instantaneous peak of the vibration signal, and is often used in measuring the magnitude of vibration. Groundborne vibration from most construction activities rarely reach the levels that can damage structures, but can achieve the audible and sensible ranges in buildings close to the site. Most project-related construction activities would generate vibration levels well below the 0.5-in/sec PPV vibration thresholds for buildings, even if two pieces of equipment (e.g., drill rig and truck or two trucks) were both operating 25 feet from a structure.

Since all adjacent off-site structures are located more than 25 feet from project construction activities, construction-related vibration effects would not be perceptible to the off-site receptors, including surrounding residential uses. However, as construction is proposed to occur adjacent to and connecting to the existing Rosenberg and Goodman Buildings, groundborne noise vibration from construction activities, particularly those that involve ground breaking (e.g., pile driving, excavation, jack hammering, etc.) could be perceptible to the occupants of these buildings. Implementation of **Mitigation Measure NO-2**, which reduces construction noise, would also reduce groundborne noise and vibration impacts. With the implementation of this measure, impacts to on-site and off-site receptors would be *less than significant*.

⁵³ California Department of Transportation, Division of Environmental Analysis, "Technical Noise Supplement," November 2009; pp. 2-48 – 2-49. Available on the internet at: http://www.dot.ca.gov/hq/env/noise/pub/tens_complete.pdf.

Ground-borne vibration is not a common environmental problem and even large vehicles (e.g., trucks and buses) do not generally result in perceptible vibration. Therefore, long-term vibration impacts associated with project implementation would be *less than significant*.

Impact C-NO-1: The proposed project, in combination with past, present, and reasonably foreseeable future projects, would not result in cumulative noise impacts. (Less than Significant)

The geographic scope of potential cumulative noise impacts encompasses the project site, its immediate vicinity, and areas adjacent to routes providing access to the project site. All cumulative projects in the site vicinity would be required to comply with Article 29 of the *Police Code* for new stationary noise sources (i.e. HVAC, etc.) and construction-related noise limits and hours. In addition, noise impacts from construction are very localized and impact noise levels in their immediate vicinity. Thus, the potential for combined effects would be low; there would be less-than-significant cumulative construction-related and operational noise impacts in areas adjacent to or near the site.

Cumulative traffic increases and associated traffic noise increases could occur as a result of the proposed project in combination with cumulative projects because traffic from these projects, along with the proposed project, would be distributed along the local roadway network. However, as discussed under Topic 4, Transportation and Circulation, this increase in vehicle trips would not cause traffic volumes to double on area streets, and therefore would not have a noticeable effect on ambient noise levels in the project site vicinity. A doubling of traffic volume is required to increase related ambient noise levels by 3 dBA, the smallest increase perceptible to the human ear. Therefore the project would not contribute to any potential cumulative traffic noise effects and this impact would be *less-than-significant*.

Mitigation: None required.

Topics:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Not Applicable
6. AIR QUALITY—Would the project:					
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐	☐
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	☐	☐	☒	☐	☐
c) 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 (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	☐	☐	☒	☐	☐
d) Expose sensitive receptors to substantial pollutant concentrations?	☐	☒	☐	☐	☐
e) Create objectionable odors affecting a substantial number of people?	☐	☐	☒	☐	☐

Setting

Overview

The Bay Area Air Quality Management District (BAAQMD) is the regional agency with jurisdiction over the nine-county San Francisco Bay Area Air Basin (SFBAAB), which includes San Francisco, Alameda, Contra Costa, Marin, San Mateo, Santa Clara, and Napa Counties and portions of Sonoma and Solano Counties. The BAAQMD is responsible for attaining and maintaining air quality in the SFBAAB within federal and state air quality standards, as established by the federal Clean Air Act (CAA) and the California Clean Air Act (CCAA), respectively. Specifically, the BAAQMD has the responsibility to monitor ambient air pollutant levels throughout the SFBAAB and to develop and implement strategies to attain the applicable federal and state standards. The CAA and the CCAA require plans to be developed for areas that do not meet air quality standards, generally. The most recent air quality plan, the *2010 Clean Air Plan*, was adopted by the BAAQMD on September 15, 2010. The *2010 Clean Air Plan* updates the *Bay Area 2005 Ozone Strategy* in accordance with the requirements of the CCAA 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 *2010 Clean Air Plan* contains the following primary goals:

- Attain air quality standards;
- Reduce population exposure and protect public health in the San Francisco Bay Area; and
- Reduce greenhouse gas emissions and protect the climate.

The *2010 Clean Air Plan* represents the most current applicable air quality plan for the SFBAAB. Consistency with this plan is the basis for determining whether the proposed project would conflict with or obstruct implementation of air quality plans.

Criteria Air Pollutants

In accordance with the state and federal CAAs, 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. In general, the SFBAAB experiences low concentrations of most pollutants when compared to federal or state standards. The SFBAAB is designated as either in attainment⁵⁴ or unclassified for most criteria pollutants with the exception of ozone, PM_{2.5}, and PM₁₀, for which these pollutants are designated as non-attainment for either the state or federal standards. 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

⁵⁴ "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.

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.⁵⁵

Land use projects may contribute to regional criteria air pollutants during the construction and operational phases of a project. **Table 6** identifies air quality significance thresholds followed by a discussion of each threshold. Projects that would result in criteria air pollutant emissions below these significance thresholds would not violate an air quality standard, contribute substantially to an air quality violation, or result in a cumulatively considerable net increase in criteria air pollutants within the SFBAAB.

TABLE 6
CRITERIA AIR POLLUTANT SIGNIFICANCE THRESHOLDS

Pollutant	Construction Thresholds	Operational Thresholds	
	Average Daily Emissions (lbs./day)	Average Daily Emissions (lbs./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	

Ozone Precursors. As discussed previously, the SFBAAB is currently designated as non-attainment for ozone and particulate matter. 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). The potential for a project to result in a cumulatively considerable net increase in criteria air pollutants, which may contribute to an existing or projected air quality violation, are based on the state and federal Clean Air Acts emissions limits for stationary sources. To ensure that new stationary sources do not cause or contribute to a violation of an air quality standard, BAAQMD Regulation 2, Rule 2 requires that any new source that emits criteria air pollutants above a specified emissions limit must offset those emissions. For ozone precursors ROG and NO_x, the offset emissions level is an annual average of 10 tons per year (or 54 pounds (lbs.) per day).⁵⁶ These levels represent emissions by which new sources are not anticipated to contribute to an air quality violation or result in a considerable net increase in criteria air pollutants.

Although this regulation applies to new or modified stationary sources, land use development projects result in ROG and NO_x emissions as a result of increases in vehicle trips, architectural coating and construction activities. Therefore, the above thresholds can be applied to the construction and operational phases of land use projects and those projects that result in emissions below these thresholds, would not be considered to contribute to an existing or projected air quality violation or result in a considerable net

⁵⁵ Bay Area Air Quality Management District (BAAQMD), *California Environmental Quality Act Air Quality Guidelines*, May 2011, page 2-1.

⁵⁶ BAAQMD, *Revised Draft Options and Justification Report, California Environmental Quality Act Thresholds of Significance*, October 2009, page 17.

increase in ROG and NO_x emissions. Due to the temporary nature of construction activities, only the average daily thresholds are applicable to construction phase emissions.

Particulate Matter (PM₁₀ and PM_{2.5}).⁵⁷ The BAAQMD has not established an offset limit for PM_{2.5}. However, the emissions limit in the federal NSR for stationary sources in nonattainment areas is an appropriate significance threshold. For PM₁₀ and PM_{2.5}, the emissions limit under NSR is 15 tons per year (82 lbs. per day) and 10 tons per year (54 lbs. per day), respectively. These emissions limits represent levels below which a source is not expected to have an impact on air quality.⁵⁸ Similar to ozone precursor thresholds identified above, land use development projects typically result in particulate matter emissions as a result of increases in vehicle trips, space heating and natural gas combustion, landscape maintenance, and construction activities. Therefore, the above thresholds can be applied to the construction and operational phases of a land use project. Again, because construction activities are temporary in nature, only the average daily thresholds are applicable to construction-phase emissions.

Fugitive Dust. Fugitive dust emissions are typically generated during construction phases. Studies have shown that the application of best management practices (BMPs) at construction sites significantly control fugitive dust⁵⁹ and individual measures have been shown to reduce fugitive dust by anywhere from 30 to 90 percent.⁶⁰ The BAAQMD has identified a number of BMPs to control fugitive dust emissions from construction activities.⁶¹ The City's Construction Dust Control Ordinance (Ordinance 176-08, effective July 30, 2008) requires a number of measures to control fugitive dust and the BMPs employed in compliance with the City's Construction Dust Control Ordinance is an effective strategy for controlling construction-related fugitive dust.

Other Criteria Pollutants. Regional concentrations of CO in the Bay Area have not exceeded the state standards in the past 11 years and SO₂ concentrations have never exceeded the standards. The primary source of CO emissions from development projects is vehicle traffic. Construction-related SO₂ emissions represent a negligible portion of the total basin-wide emissions and construction-related CO emissions represent less than five percent of the Bay Area total basin-wide CO emissions. As discussed previously, the Bay Area is in attainment for both CO and SO₂. Furthermore, the BAAQMD has demonstrated, based on modeling, that in order to exceed the California ambient air quality standard of 9.0 ppm (8-hour average) or 20.0 ppm (1-hour average) for CO, project traffic in addition to existing traffic would need to exceed 44,000 vehicles per hour at affected intersections (or 24,000 vehicles per hour where vertical and/or horizontal mixing is limited). Therefore, given the Bay Area's attainment status and the limited CO and SO₂ emissions that could result from a development projects, development projects would not result in a cumulatively considerable net increase in CO or SO₂, and quantitative analysis is not required.

⁵⁷ 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.

⁵⁸ BAAQMD, *Revised Draft Options and Justification Report, California Environmental Quality Act Thresholds of Significance*, October 2009, page 16.

⁵⁹ Western Regional Air Partnership. 2006. *WRAP Fugitive Dust Handbook*. September 7, 2006. This document is available online at http://www.wrapair.org/forums/dejffdh/content/FDHandbook_Rev_06.pdf, accessed February 16, 2012.

⁶⁰ BAAQMD, *Revised Draft Options and Justification Report, California Environmental Quality Act Thresholds of Significance*, October 2009, page 27.

⁶¹ BAAQMD, *CEQA Air Quality Guidelines*, May 2011.

Local Health Risks and Hazards

In addition to criteria air pollutants, individual projects may emit toxic air contaminants (TACs). TACs collectively refer to a diverse group of air pollutants that are capable of causing chronic (i.e., of long-duration) and acute (i.e., severe but of 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. Individual TACs vary greatly in the health risk they present; at a given level of exposure, one TAC may pose a hazard that is many times greater than another.

Unlike criteria air pollutants, TACs do not have ambient air quality standards but are regulated by the BAAQMD 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.⁶²

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 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, 350 days per year, for 70 years. Therefore, assessments of air pollutant exposure to residents typically result in the greatest adverse health outcomes of all population groups.

Sensitive receptors that could potentially be affected by the proposed project include existing residents at the project site and residences located along Avalon Avenue. There is also a pre-school located at the intersection of Avalon Street and Mission Street across from the project site that could be affected by emissions from the proposed project.

Exposures to fine particulate matter (PM_{2.5}) are strongly associated with mortality, respiratory diseases, and lung development in children, and other endpoints such as hospitalization for cardiopulmonary disease.⁶³ In addition to PM_{2.5}, diesel particulate matter (DPM) is also of concern. The California Air Resources Board (ARB) identified DPM as a TAC in 1998, primarily based on evidence demonstrating cancer effects in humans.⁶⁴ 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.

⁶² In general, a health risk assessment is required if the BAAQMD 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.

⁶³ SFDPH, *Assessment and Mitigation of Air Pollutant Health Effects from Intra-Urban Roadways: Guidance for Land Use Planning and Environmental Review*, May 2008.

⁶⁴ California Air Resources Board (ARB), Fact Sheet, "The Toxic Air Contaminant Identification Process: Toxic Air Contaminant Emissions from Diesel-fueled Engines," October 1998.

In an effort to identify areas of San Francisco most adversely affected by sources of TACs, San Francisco partnered with the BAAQMD 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. The project site is not located within an Air Pollutant Exposure Zone. Each of the Air Pollutant Exposure Zone criteria is discussed below. (As further discussed under Impact AQ-4, although the project site is not located within an Air Pollutant Exposure Zone, the BAAQMD inventory and assessment of air pollution does not appear to include the three existing generators at the Jewish Home campus, and therefore existing exposure to TACs from stationary sources may be underestimated in the Air Pollutant Exposure Zone analysis. Please see Impact AQ-4, which addresses the cumulative health risk of all (existing and proposed) generators at the Jewish Home campus and associated Mitigation Measure AQ-4.)

Excess Cancer Risk. The above 100 per one million persons (100 excess cancer risk) criteria is based on United State Environmental Protection Agency (USEPA) guidance for conducting air toxic analyses and making risk management decisions at the facility and community-scale level.⁶⁵ As described by the BAAQMD, the USEPA considers a cancer risk of 100 per million to be within the “acceptable” range of cancer risk. Furthermore, in the 1989 preamble to the benzene National Emissions Standards for Hazardous Air Pollutants (NESHAP) rulemaking,⁶⁶ the USEPA states that it “...strives to provide maximum feasible protection against risks to health from hazardous air pollutants by (1) protecting the greatest number of persons possible to an individual lifetime risk level no higher than approximately one in one million and (2) limiting to no higher than approximately one in ten thousand [100 in one million] the estimated risk that a person living near a plant would have if he or she were exposed to the maximum pollutant concentrations for 70 years.” The 100 per one million excess cancer cases is also consistent with the ambient cancer risk in the most pristine portions of the Bay Area based on BAAQMD regional modeling.⁶⁷

Fine Particulate Matter. In April 2011, the USEPA published *Policy Assessment for the Particulate Matter Review of the National Ambient Air Quality Standards*, “Particulate Matter Policy Assessment.” In this document, USEPA staff concludes that the current federal annual PM_{2.5} standard of 15 µg/m³ should be revised to a level within the range of 13 to 11 µg/m³, with evidence strongly supporting a standard within the range of 12 to 11 µg/m³. 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 USEPA’s Particulate Matter Policy Assessment, 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, studies have shown an association between the proximity of sensitive land uses to freeways and a variety of respiratory

⁶⁵ BAAQMD, *Revised Draft Options and Justification Report, California Environmental Quality Act Thresholds of Significance*, October 2009, page 67.

⁶⁶ 54 Federal Register 38044, September 14, 1989.

⁶⁷ BAAQMD, *Revised Draft Options and Justification Report, California Environmental Quality Act Thresholds of Significance*, October 2009, page 67.

symptoms, asthma exacerbations, and decreases in lung function in children. Siting sensitive uses in close proximity to 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,⁶⁸ lots that are within 500 feet of freeways are included in the Air Pollutant Exposure Zone.

Health Vulnerable Locations. Based on the BAAQMD's evaluation of health vulnerability in the Bay Area, those zip codes (94102, 94103, 94105, 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 lots 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/m³.⁶⁹

The above citywide health risk modeling was also used as the basis in approving a series of amendments to the San Francisco Building and Health Codes, generally referred to as the Enhanced Ventilation Required for Urban Infill Sensitive Use Developments or Health Code, Article 38 (Ordinance 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 Air Pollutant Exposure Zone. 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.

Construction Air Quality Impacts

Project-related air quality impacts fall into two categories: short-term impacts from construction and long-term impacts from project operation. The following addresses construction-related air quality impacts resulting from the proposed project.

Impact AQ-1: The proposed project's construction activities would generate fugitive dust and criteria air pollutants, but would not violate an air quality standard, contribute substantially to an existing or projected air quality violation and would not result in a cumulatively considerable net increase in criteria air pollutants. (Less than Significant)

Construction activities (short-term) typically result in emissions of ozone precursors and PM in the form of dust (fugitive dust) and exhaust (e.g., vehicle tailpipe emissions). Emissions of ozone precursors and PM are primarily a result of the combustion of fuel from on-road and off-road vehicles. However, ROGs are also emitted from activities that involve painting, other types of architectural coatings, or asphalt paving. The proposed project includes demolition of the Main building, including its west and infirmary

⁶⁸ 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>.

⁶⁹ San Francisco Planning Department and San Francisco Department of Public Health, *2014 Air Pollutant Exposure Zone Map (Memo and Map)*, April 9, 2014. These documents are part of San Francisco Board of Supervisors File No. 14806, Ordinance No. 224-14 Amendment to Health Code Article 38.

wings approximately 50,600 square feet in area and the construction of two buildings in the southwest quadrant of the project site. Together, the two new buildings would encompass approximately 264,984 square feet of net new building area, including below-grade parking.

During the project's approximately two-year construction period beginning in spring of 2016 to summer of 2018, construction activities would have the potential to result in emissions of fugitive dust, 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. Although there are federal standards for air pollutants and implementation of state and regional air quality control plans, air pollutants continue to have impacts on human health throughout the country. California has found that particulate matter exposure can cause health effects at lower levels than national standards. The current health burden of particulate matter demands that, where possible, public agencies take feasible available actions to reduce sources of particulate matter exposure. According to the ARB, reducing particulate matter PM_{2.5} concentrations to state and federal standards of 12 µg/m³ in the San Francisco Bay Area would prevent between 200 and 1,300 premature deaths.⁷⁰

Dust can be an irritant causing watering eyes or irritation to the lungs, nose, and throat. Demolition, excavation, grading, and other construction activities can cause wind-blown dust that adds particulate matter to the local atmosphere. Depending on exposure, adverse health effects can occur due to this particulate matter in general and also due to specific contaminants such as lead or asbestos that may be constituents of soil.

In response, the San Francisco Board of Supervisors approved a series of amendments to the *San Francisco Building and Health Codes* generally referred hereto as the Construction Dust Control Ordinance (Ordinance 176-08, effective July 30, 2008) with the intent of reducing the quantity of dust generated during site preparation, demolition and 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 (DBI).

The Ordinance requires that all site preparation work, demolition, or other construction activities within San Francisco that have the potential to create dust or to expose or disturb more than 10 cubic yards or 500 square feet of soil comply with specified dust control measures whether or not the activity requires a permit from DBI. The Director of DBI may waive this requirement for activities on sites less than one half-acre that are unlikely to result in any visible wind-blown dust.

In compliance with the Construction Dust Control Ordinance, the project sponsor and the contractor responsible for construction activities at the project site would be required to use the following practices

⁷⁰ ARB, *Methodology for Estimating Premature Deaths Associated with Long-term Exposure to Fine Airborne Particulate Matter in California*, Staff Report, Table 4c, October 24, 2008.

to control construction dust on the site or other practices that result in equivalent dust control that are acceptable to the Director. Dust suppression activities may include watering all active construction areas sufficiently to prevent dust from becoming airborne; increased watering frequency may be necessary whenever wind speeds exceed 15 miles per hour. During excavation and dirt-moving activities, contractors shall wet sweep or vacuum the streets, sidewalks, paths, and intersections where work is in progress at the end of the workday. Inactive stockpiles (where no disturbance occurs for more than seven days) greater than 10 cubic yards or 500 square feet of excavated material, backfill material, import material, gravel, sand, road base, and soil shall be covered with a 10 mil (0.01 inch) polyethylene plastic (or equivalent) tarp, braced down, or use other equivalent soil stabilization techniques. CCSF Ordinance 175-91 restricts the use of potable water for soil compaction and dust control activities undertaken in conjunction with any construction or demolition project occurring within the boundaries of San Francisco, unless permission is obtained from the San Francisco Public Utilities Commission (SFPUC). Non-potable water must be used for soil compaction and dust control activities during project construction and demolition. The SFPUC operates a recycled water truck-fill station at the Southeast Water Pollution Control Plant that provides recycled water for these activities at no charge.

For projects over one half-acre, such as the proposed project, the Dust Control Ordinance requires that the project sponsor submit a Dust Control Plan for approval by the San Francisco Department of Public Health. DBI will not issue a building permit without written notification from the Director of Public Health that the applicant has a site-specific Dust Control Plan, unless the Director waives the requirement. Interior-only tenant improvement projects that are over one-half acre in size that will not produce exterior visible dust are exempt from the site-specific Dust Control Plan requirement.

The site-specific Dust Control Plan would require the project sponsor to: submit of a map to the Director of Public Health showing all sensitive receptors within 1,000 feet of the site; wet down areas of soil at least three times per day; provide an analysis of wind direction and install upwind and downwind particulate dust monitors; record particulate monitoring results; hire an independent, third-party to conduct inspections and keep a record of those inspections; establish shut-down conditions based on wind, soil migration, etc.; establish a hotline for surrounding community members who may be potentially affected by project-related dust; limit the area subject to construction activities at any one time; install dust curtains and windbreaks on the property lines, as necessary; limit the amount of soil in hauling trucks to the size of the truck bed and securing with a tarpaulin; enforce a 15 mph speed limit for vehicles entering and exiting construction areas; sweep affected streets with water sweepers at the end of the day; install and utilize wheel washers to clean truck tires; terminate construction activities when winds exceed 25 miles per hour; apply soil stabilizers to inactive areas; and sweep off adjacent streets to reduce particulate emissions. The project sponsor would be required to designate an individual to monitor compliance with these dust control requirements.

Compliance with the regulations and procedures set forth by the San Francisco Dust Control Ordinance would ensure that potential dust-related air quality impacts would be reduced to a *less-than-significant* level.

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. To assist lead agencies in determining whether short-term construction-related air pollutant emissions require further analysis as to whether the project may exceed the criteria air pollutant significance thresholds shown in **Table 6**, above, the BAAQMD, in its *CEQA Air Quality Guidelines* (May 2011), developed screening criteria. 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 greenfield⁷¹ sites without any form of mitigation measures taken into consideration. In addition, the screening criteria do not account for project design features, attributes, or local development requirements that could also result in lower emissions.

The proposed project exceeds the criteria air pollutant screening criteria, therefore a quantitative analysis was conducted. Construction-related criteria air pollutants generated by the proposed project were quantified using the California Emissions Estimator Model (CalEEMod, version 2013.2.2).⁷² The model was developed, including default data (e.g., emission factors, meteorology, etc.), in collaboration with California air districts' staff. This version of the CalEEMod model was released in October 2013 and uses emission factors from the OFFROAD2007 model and the 2011 Inventory Model for the In-use Off-road Equipment Rule of the ARB. Default assumptions were used where project-specific information was unknown. Construction of the proposed project would occur over an approximately two year period beginning in spring of 2016 and is expected to be complete by the second quarter of 2018. Assuming 5 working days per week, this translates to approximately 490 days of construction over the 2 year period. As the project's construction phasing schedule was not available, CalEEMod default construction phase durations were used to reflect the construction phasing of the proposed project, along with project specific information on construction equipment mix provided by the project sponsor to estimate emissions. Emissions were converted from tons/year to lbs/day using the estimated construction duration of 490 working days for the construction period. As shown in **Table 7**, all unmitigated project construction emissions would be below the significance thresholds shown in Table 6. Therefore, the project would have a *less than significant* impact related to construction criteria air pollutant emissions.

Mitigation: None required.

⁷¹ A greenfield site refers to agricultural or forest land or an undeveloped site earmarked for commercial, residential, or industrial projects.

⁷² South Coast Air Quality Management District (SCAQMD), CalEEMod, California Emissions Estimator Model. Version 2013.2.2. Available at <http://www.caleemod.com/>. 2013.

TABLE 7
DAILY PROJECT CONSTRUCTION EMISSIONS

	Average Daily Construction Emissions (lbs./day)			
	ROG	NO _x	PM ₁₀	PM _{2.5}
2016	3.4	26.9	3.1	1.9
2017	15.7	20.1	2.1	1.4
2018	1.6	12.1	1.3	0.8
Significance Threshold	54	54	82	54
Significant?	No	No	No	No

SOURCE: ESA, 2015

Impact AQ-2: The proposed project's construction activities would generate toxic air contaminants, including diesel particulate matter, but would not expose sensitive receptors to substantial pollutant concentrations. (Less than Significant)

As discussed above, the project site is not within an Air Pollutant Exposure Zone. With regards to construction emissions, off-road equipment (which includes construction-related equipment) is a large contributor to DPM emissions in California, although since 2007, the ARB has found the emissions to be substantially lower than previously expected.⁷³ Newer and more refined emission inventories have substantially lowered the estimates of DPM emissions from off-road equipment such that off-road equipment is now considered the sixth largest source of DPM emissions in California.⁷⁴ This reduction in emissions in part, is due to refined emissions estimation methodologies. For example, revised PM emission estimates for the year 2010, which DPM is a major component of total PM, have decreased by 83 percent from previous 2010 emission estimates for the SFBAAB.⁷⁵ Approximately half of the reduction can be attributed to the economic recession of the late 2000s and approximately half can be attributed to updated assumptions (e.g., updated methodologies used to better assess construction emissions).⁷⁶

Additionally, a number of federal and state regulations are requiring cleaner off-road equipment. Specifically, both the USEPA and California 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 would be phased in between 2008 and 2015. To meet the Tier 4 emission standards, engine manufacturers will be required to produce new engines with advanced emission-control technologies. Although the full benefits of these regulations will

⁷³ ARB, *Staff Report: Initial Statement of Reasons for Proposed Rulemaking, Proposed Amendments to the Regulation for In-Use Off-Road Diesel-Fueled Fleets and the Off-Road Large Spark-Ignition Fleet Requirements*, p.1 and p. 13 (Figure 4), October 2010.

⁷⁴ ARB, *Staff Report: Initial Statement of Reasons for Proposed Rulemaking, Proposed Amendments to the Regulation for In-Use Off-Road Diesel-Fueled Fleets and the Off-Road Large Spark-Ignition Fleet Requirements*, October 2010.

⁷⁵ ARB, "In-Use Off-Road Equipment, 2011 Inventory Model," Query accessed online, April 2, 2012, http://www.arb.ca.gov/msei/categories.htm#inuse_or_category.

⁷⁶ ARB, *Staff Report: Initial Statement of Reasons for Proposed Rulemaking, Proposed Amendments to the Regulation for In-Use Off-Road Diesel-Fueled Fleets and the Off-Road Large Spark-Ignition Fleet Requirements*, October 2010.

not be realized for several years, the USEPA estimates that by implementing the federal Tier 4 standards, NO_x and PM emissions will be reduced by more than 90 percent.⁷⁷

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 BAAQMD'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.”⁷⁸

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.

Although on-road heavy-duty diesel vehicles and off-road equipment would be used during the 24-month construction duration, emissions would be temporary and variable in nature and would not be expected to expose sensitive receptors to substantial air pollutants. Furthermore, the proposed project would be subject to, and would comply with, California regulations limiting idling to no more than five minutes,⁷⁹ which would further reduce nearby sensitive receptor exposure to temporary and variable DPM emissions. Therefore, because the project site is not within the Air Pollutant Exposure Zone and construction activities would be temporary and variable over the 24-month construction period, TAC emissions would result in a *less-than-significant* impact to sensitive receptors.

Mitigation: None required.

Operational Air Quality Impacts

Land use projects typically result in emissions of criteria air pollutants and toxic air contaminants primarily from an increase in motor vehicle trips. However, land use projects may also result in criteria air pollutants and toxic air contaminants from combustion of natural gas, landscape maintenance, use of consumer products, and architectural coating. The following addresses air quality impacts resulting from operation of the proposed project.

⁷⁷ United State Environmental Protection Agency (USEPA), “Clean Air Nonroad Diesel Rule: Fact Sheet,” May 2004.

⁷⁸ BAAQMD, *CEQA Air Quality Guidelines*, May 2011, page 8-6.

⁷⁹ California Code of Regulations, Title 13, Division 3, § 2485 (on-road) and § 2449(d)(2) (off-road).

Impact AQ-3: Project operations would not result in emissions of criteria air pollutants at levels that would violate an air quality standard, contribute to an existing or projected air quality violation, or result in a cumulatively considerable net increase in criteria air pollutants. (Less than Significant)

As discussed above in Impact AQ-1, the BAAQMD, in its *CEQA Air Quality Guidelines* (May 2011), 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 would generate criteria pollutant emissions associated with vehicle traffic (mobile sources), on-site area sources (i.e., natural gas combustion for space and water heating, and combustion of other fuels by building and grounds maintenance equipment), energy usage, and routine testing of a backup diesel generator. Operational-related criteria air pollutants generated by the proposed project were also quantified using CalEEMod. Default assumptions were used where project-specific information was unknown. The model was refined to reflect the project-specific trip generation as determined by the traffic study, which considered the availability of transit systems in the area. Vehicle trip lengths from CalEEMod, which were developed with input from the BAAQMD, were used to determine the increase in vehicle miles travelled from the proposed project because project-specific trip lengths are not estimated in the transportation analysis. CalEEMod default emission factors for motor vehicle trips are based on EMFAC2011 emission factors. Estimated emissions of ROG from maintenance applications of architectural coatings reflect volatile organic compound (VOC) content limits of Regulation 8, Rule 3 of the BAAQMD. According to the traffic study, the proposed expansion of the Jewish Home would result in an average increase of 635 daily vehicle trips to the site.

Potential emissions from the proposed new emergency diesel generator (a stationary source) were estimated based on ARB/USEPA Tier 3 emission standards. At this point in time, the project applicant has confirmed that specifications for the proposed generator are not available. In order to estimate emissions associated with the generator, the project sponsor has confirmed that the proposed generator would meet the federal Tier 3 diesel engine standards for particulate matter for diesel engines with a rating between 75 and 750 horsepower, consistent with USEPA regulations for emergency stationary diesel generators manufactured after 2010. Project operational emissions of criteria pollutants from vehicle, stationary (backup generator) and area sources are summed.

The daily and annual emissions associated with operation of the proposed project are shown in **Table 8**. Table 8 also includes the thresholds of significance the City utilizes.

As shown, operation of the proposed project would not generate emissions that would exceed significance thresholds for criteria air pollutants, and the project would result in a *less-than-significant* impact.

Mitigation: None required.

TABLE 8
SUMMARY OF OPERATIONAL CRITERIA AIR POLLUTANT EMISSIONS

Source	ROG	NOx	PM ₁₀	PM _{2.5}
Average Daily Emissions (pounds/day)				
Area Sources	5	0.2	0.1	0.1
Energy	0.04	0.37	0.03	0.03
Mobile Sources	2.5	5	3.8	1.1
Emergency Generator	0.1	0.6	<0.1	<0.1
Total Project Emissions	7.6	6.2	4.0	1.3
Significance Threshold	54	54	82	54
Significant?	No	No	No	No
Maximum Annual Emissions (tons/year)				
Total Project Emissions	2.04	2.62	0.27	0.18
Significance Threshold	10	10	10	10
Significant?	No	No	No	No

SOURCE: ESA, 2015

Impact AQ-4: During project operations, the proposed project would generate toxic air contaminants, including diesel particulate matter, but would not expose sensitive receptors to substantial air pollutant concentrations. (Less than Significant with Mitigation)

As discussed above, the project site is not within an Air Pollutant Exposure Zone. However, the proposed project would generate toxic air contaminants through introduction of a new diesel generator, as well as site sensitive residential land uses in proximity to the existing and proposed generators, as discussed below.

Sources of Toxic Air Contaminants

Vehicle Trips. Individual projects result in emissions of toxic air contaminants primarily as a result of an increase in vehicle trips. The BAAQMD considers roads with less than 10,000 vehicles per day “minor, low-impact” sources that do not pose a significant health impact even in combination with other nearby sources and recommends that these sources be excluded from the environmental analysis. The proposed project’s 635 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.

On-Site Diesel Generator. The proposed project would include a backup emergency generator. Emergency generators are regulated by the BAAQMD through its New Source Review (Regulation 2, Rule 5) permitting process. The project applicant would be required to obtain applicable permits to operate an emergency generator from the BAAQMD. Although emergency generators are intended only to be used in periods of power outages, monthly testing of the generator would be required. The BAAQMD limit testing to no more than 50 hours per year. Additionally, as part of the permitting process, the BAAQMD limits the excess cancer risk from any facility to no more than ten per one million population and requires any source

that would result in an excess cancer risk greater than one per one million population to install Best Available Control Technology for Toxics (TBACT).

As noted above, BAAQMD inventory and assessment of air pollution does not appear to include the three existing generators at the Jewish Home campus. To ensure that the proposed project would not expose sensitive receptors to substantial air pollutant concentrations from existing generators, **Mitigation Measure M-AQ-4** would require the project sponsor to analyze the health risk of all existing and proposed stationary sources when obtaining the BAAQMD permit through its New Source Review (Regulation 2, Rule 5) permitting process for the proposed new generator and to modify the operations of the generators as specified in Mitigation Measure M-AQ-4, if necessary to ensure that the health risks do not exceed the threshold(s) specified in Mitigation Measure M-AQ-4. Compliance with this measure would ensure that project-generated TAC emissions would not expose sensitive receptors to substantial air pollutant concentrations, and TAC emissions would be *less than significant*.

Mitigation Measure M-AQ-4. Permitting of Diesel Generators.

The project sponsor shall ensure that the proposed new backup generator at the project site meets or exceeds one of the following emission standards for particulate matter: (1) Tier 4 certified engine, or (2) Tier 2 or Tier 3 certified engine that is equipped with a California Air Resources Board (ARB) Level 3 Verified Diesel Emissions Control Strategy (VDECS). A non-verified diesel emission control strategy may be used if the filter has the same particulate matter reduction as the identical ARB verified model and if the Bay Area Air Quality Management District (BAAQMD) approves of its use. The project sponsor shall also ensure that all existing generators at the project site either meet one of the above standards or are within the BAAQMD single-source threshold of 10 in one million cancer risk. Such revisions may include, as necessary to bring emissions below the threshold(s) noted herein, actions such as retrofitting and/or replacement of one, two, or all three of the existing generators. The project sponsor shall submit documentation of compliance with the BAAQMD New Source Review permitting process (Regulation 2, Rule 2, and Regulation 2, Rule 5) and the emission standard requirement of this mitigation measure, with respect to the new generator, and shall submit documentation of compliance with the emission standard requirement of this mitigation measure, with respect to the existing generators, to the Planning Department prior to issuance of a Certificate of Occupancy for the first new building to be constructed.

Siting Sensitive Land Uses

The project site currently includes sensitive uses. As stated in the project description, the proposed expansion of the Jewish Home would increase the number of RCFE units at the site by 210 units and the number of residents at the site by 245. Therefore the proposed project is considered a sensitive land use for purposes of air quality evaluation. The project site is not located within an Air Pollutant Exposure Zone, meaning that, currently, excess cancer risk from all known sources in the area is less than 100 per one million and PM_{2.5} concentrations (ambient concentrations and concentrations from all known sources) are less than 10 µg/m³. Using the BAAQMD's Stationary Source Screening Analysis Tool and the GDF Distance multiplier adjustments to refine the data, the existing cumulative lifetime cancer risk at the project site is about 3 in a million. As noted above, however, BAAQMD inventory and assessment of air pollution does not appear to include the three existing generators at the Jewish Home campus, and air pollutant concentrations may be higher than currently reported in the Air Pollutant Exposure Zone analysis.

Implementation of **Mitigation Measure M-AQ-4**, which would require calculation of health risk cumulatively from all sources (including the three on-site existing generators and the proposed generator), would address any potential understatement and ensure that the project would not site sensitive land uses in an area with substantial pollutant concentrations, and the impact would be *less than significant*.

Based on the foregoing, with implementation of Mitigation Measure M-AQ-4, the proposed project would result in a *less-than-significant* impact with respect to exposing sensitive receptors to substantial levels of air pollution.

Impact AQ-5: The proposed project would not conflict with, or obstruct implementation of the 2010 Clean Air Plan. (Less than Significant)

The most recently adopted air quality plan for the SFBAAB is the *2010 Clean Air Plan*. The *2010 Clean Air Plan* is a road map that demonstrates how the San Francisco Bay Area will achieve compliance with the state ozone standards as expeditiously as practicable and how the region will reduce the transport of ozone and ozone precursors to neighboring air basins. In determining consistency with the *2010 Clean Air Plan* (CAP), this analysis considers whether the project would: (1) support the primary goals of the CAP, (2) include applicable control measures from the CAP, and (3) avoid disrupting or hindering implementation of control measures identified in the CAP.

The primary goals of the CAP are to: (1) Reduce emissions and decrease ambient concentration of harmful pollutants; (2) Safeguard the public health by reducing exposure to air pollutants that pose the greatest risk; and (3) Reduce greenhouse gas emissions. To meet the primary goals, the CAP recommends 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. The CAP 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. To this end, the *2010 Clean Air Plan* includes 55 control measures aimed at reducing air pollution in the SFBAAB.

The 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 is discussed in Section E.7, Greenhouse Gas Emissions, which demonstrates that the proposed project would comply with the applicable provisions of the City's Greenhouse Gas Reduction Strategy. The project would exceed *California Building Code* Title 24 standards, as well as provide at least 1 percent of the facility's energy with on-site renewables,⁸⁰ resulting in reduced energy consumption as compared with traditional development.

⁸⁰ Per City of San Francisco Environment Code Chapter 8, Sections 705(b) and 706 (a), this requirement applies to all municipal construction projects. The ordinance defines "Construction Project" as any building, planning or construction activity, including demolition, new construction, major alteration, or building additions by a City department at a City-owned Facility or City Leasehold.

The compact development of the proposed project and high availability of viable transportation options ensure that residents and visitors could bicycle, walk, and ride transit to and from the project site instead of taking trips via private automobile. Given the proposed project is a facility that serves the aging and elderly population of the City, project residents would rely on transportation services provided by the facility and not generate individual automobile trips. These features ensure that the project would avoid substantial growth in automobile trips and vehicle miles traveled. The proposed project's anticipated 540 net new vehicle trips would result in a negligible increase in air pollutant emissions. Furthermore, the proposed project would be generally consistent with the *San Francisco General Plan*, as discussed in Section 4. Transportation control measures that are identified in the *2010 Clean Air Plan* are implemented by the *San Francisco General Plan* and the Planning Code, for example, through the City's Transit First Policy, bicycle parking requirements, and transit impact development fees. Compliance with these requirements would ensure the project includes relevant transportation control measures specified in the *2010 Clean Air Plan*. Therefore, the proposed project would include applicable control measures identified in the CAP to meet the CAP's primary goals.

Examples of projects that could cause the disruption or delay of *Clean Air Plan* control measures are projects that would preclude the extension of a transit line or bike path, or projects that would include excessive parking beyond parking requirements. The proposed project would expand an existing use within 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 avoid disrupting or hindering implementation of control measures identified in the CAP.

For the reasons described above, the proposed project would not interfere with implementation of the *2010 Clean Air Plan*, and because the proposed project would be consistent with the applicable air quality plan that demonstrates how the region will improve ambient air quality and achieve the state and federal ambient air quality standards, this impact would be *less than significant*.

Mitigation: None required.

Impact AQ-6: The proposed project would not create objectionable odors that would 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. These odor sources do not exist at the project site, and the proposed expansion would not create a new source of odors. The campus's central kitchen is located in the Rosenberg Building basement level, and no changes to the kitchen are anticipated under the proposed project. During construction, diesel exhaust from construction equipment would generate some odors. However, construction-related odors would be temporary and would not persist upon project completion. Therefore, odor impacts would be *less than significant*.

Mitigation: None required.

Impact C-AQ-1: The proposed project, in combination with past, present, and reasonably foreseeable future development in the project area, would result in less-than-significant cumulative air quality impacts. (Less than Significant with Mitigation)

As discussed above, regional air pollution is by its very nature largely a cumulative impact. Emissions from past, present, and future projects contribute to the region's adverse air quality on a cumulative basis. No single project by itself would be sufficient in size to result in regional nonattainment of ambient air quality standards. Instead, a project's individual emissions contribute to existing cumulative adverse air quality impacts.⁸¹ The project-level thresholds for criteria air pollutants are based on levels by which new sources are not anticipated to contribute to an air quality violation or result in a considerable net increase in criteria air pollutants.

Therefore, because the proposed project's construction (Impact AQ-1) and operational (Impact AQ-3) emissions would not exceed the project-level thresholds for criteria air pollutants, the proposed project would not be considered to result in a cumulatively considerable contribution to regional air quality impacts.

Although the project would add new sensitive receptors and a new stationary source (a generator), the project site is not located within an Air Pollutant Exposure Zone. Implementation of **Mitigation Measure M-AQ-4**, which would require permitting of existing generators together with the proposed generator, would ensure that the project's incremental increase in localized TAC emissions resulting from the existing and new generators would be minor and would not contribute substantially to cumulative TAC emissions that could affect existing and proposed sensitive land uses. Therefore, cumulative air quality impacts would be considered *less than significant*.

In summary, cumulative air quality impacts would be *less than significant*.

Mitigation: Mitigation Measure M-AQ-4. Permitting of Diesel Generators.

Topics:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Not Applicable
7. 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?	☐	☐	☒	☐	☐

⁸¹ BAAQMD, *CEQA Air Quality Guidelines*, May 2011, page 2-1.

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 contribute to global climate change and its associated environmental impacts.

The Bay Area Air Quality Management District (BAAQMD) has prepared guidelines and methodologies for analyzing GHGs. These guidelines are 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. CEQA Guidelines Section 15064.4 allows lead agencies to rely on a qualitative analysis to describe GHG emissions resulting from a project. CEQA Guidelines Section 15183.5 allows for public agencies to analyze and mitigate GHG emissions as part of a larger plan for the reduction of greenhouse gases and describes the required contents of such a plan. Accordingly, San Francisco has prepared *Strategies to Address Greenhouse Gas Emissions* (GHG Reduction Strategy)⁸² which presents a comprehensive assessment of policies, programs, and ordinances that collectively represent San Francisco's Qualified GHG Reduction Strategy in compliance with CEQA guidelines. The actions outlined in the strategy have resulted in a 14.5 percent reduction in GHG emissions in 2010 compared to 1990 levels, exceeding the year 2020 reduction goals outlined in the BAAQMD's *2010 Clean Air Plan*, Executive Order S-3-05,⁸³ and Assembly Bill 32 (also known as the Global Warming Solutions Act.)^{84,85}

Given that the City's local greenhouse gas reduction targets are more aggressive than the State and Region's 2020 GHG reduction targets and consistent with the long-term 2050 reduction targets, the City's Greenhouse Gas Reduction Strategy is consistent with the goals of EO S-3-05, AB 32, and the Bay Area 2010 Clean Air Plan. Therefore, proposed projects that are consistent with the City's Greenhouse Gas Reduction Strategy would be consistent with the goals of EO S-3-05, AB 32, and the Bay Area 2010 Clean Air Plan, would not conflict with these plans, and would therefore not exceed San Francisco's applicable GHG threshold of significance.

The following analysis of the proposed project's impact on climate change focuses on the project's contribution to cumulatively significant GHG emissions. Given the analysis is in a cumulative context, this section does not include an individual project-specific impact statement.

⁸² San Francisco Planning Department, *Strategies to Address Greenhouse Gas Emissions in San Francisco*, 2010. The final document is available online at: <http://www.sf-planning.org/index.aspx?page=2627>.

⁸³ Executive Order S-3-05, sets forth a series of target dates by which statewide emissions of GHGs need to be progressively reduced, as follows: by 2010, reduce GHG emissions to 2000 levels (approximately 457 million MTCO₂E); by 2020, reduce emissions to 1990 levels (estimated at 427 million MTCO₂E); and by 2050 reduce emissions to 80 percent below 1990 levels (approximately 85 million MTCO₂E).

⁸⁴ San Francisco Department of Environment (DOE), "San Francisco Community-Wide Carbon Emissions by Category." Excel spreadsheet provided via email between Pansy Gee, DOE and Wade Wietgreffe, San Francisco Planning Department. June 7, 2013.

⁸⁵ The *Clean Air Plan*, Executive Order S-3-05, and Assembly Bill 32 goals, among others, are to reduce GHGs in the year 2020 to 1990 levels.

Impact C-GG-1: The proposed project would not generate greenhouse gas emissions 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)

Individual projects contribute to the cumulative effects of climate change by directly or indirectly emitting GHGs during construction and operational phases. Direct operational emissions include GHG emissions from new vehicle trips and area sources (natural gas combustion). Indirect emissions include emissions from electricity providers, energy required to pump, treat, and convey water, and emissions associated with waste removal, disposal, and landfill operations.

The proposed project would increase the activity onsite through construction and operation of two new buildings, increasing the total number of residential seniors served by approximately 245 persons. In addition, new street-level retail would operate on Mission Street, and new on-site services for both residents and non-resident members would be provided in the Rosenberg Pavilion. Therefore, the proposed project would contribute to annual long-term increases in GHGs as a result of increased vehicle trips (mobile sources) and residential, medical, and retail operations that result in an increase in energy use, water use and wastewater treatment, and solid waste disposal. Construction activities would also result in temporary increases in GHG emissions.

The proposed project would be subject to and required to comply with several regulations adopted to reduce GHG emissions as identified in the GHG Reduction Strategy. The regulations that are applicable to the proposed project include the Commuter Benefits Ordinance, Emergency Ride Home Program, Bicycle Parking requirements, Street Tree Planting Requirements for New Construction, Mandatory Recycling and Composting Ordinance, SF Green Building Requirements for Energy Efficiency, and Stormwater Management.

These regulations, as outlined in San Francisco's *Strategies to Address Greenhouse Gas Emissions*, have proven effective as San Francisco's GHG emissions have measurably reduced when compared to 1990 emissions levels, demonstrating that the City has met and exceeded EO S-3-05, AB 32, and the Bay Area 2010 Clean Air Plan GHG reduction goals for the year 2020. The proposed project was determined to be consistent with San Francisco's GHG Reduction Strategy.⁸⁶ Other existing regulations, such as those implemented through AB 32, will continue to reduce a proposed project's contribution to climate change. Therefore, the proposed project's GHG emissions would not conflict with state, regional, and local GHG reduction plans and regulations, and thus the proposed project's contribution to GHG emissions would not be cumulatively considerable or generate GHG emissions, either directly or indirectly, that would have a significant impact on the environment. As such, the proposed project would result in a *less-than-significant* impact with respect to GHG emissions. No mitigation measures are necessary.

⁸⁶ Greenhouse Gas Analysis: Compliance Checklist, December 8, 2014. This document is on file and available for public review as part of Case File No. 2011.1323E. Available for review at the Planning Department, 1650 Mission Street, Suite 400, in Case File No. 2011.1323E.

Topics:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Not Applicable
8. WIND AND SHADOW—Would the project:					
a) Alter wind in a manner that substantially affects public areas?	☐	☐	☒	☐	☐
b) Create new shadow in a manner that substantially affects outdoor recreation facilities or other public areas?	☐	☐	☒	☐	☐

Impact WS-1: The proposed project would not alter wind in a manner that substantially affects public areas. (Less than Significant)

Average wind speeds in San Francisco are the highest in the summer and lowest in winter; however, the strongest peak winds occur in winter, in association with storm conditions. Throughout the year, the highest wind speeds typically occur in mid-afternoon and the lowest in the early morning. Westerly to northwesterly winds are the most frequent and strongest winds regardless of season. Of the primary wind directions, four have the greatest frequency of occurrence and also make up the majority of the strong winds that occur; these include the northwest, west-northwest, west, and west-southwest. The topography west and northwest of the project site—specifically Twin Peaks and Mount Davidson—affect wind speed and direction in the Excelsior neighborhood.

Wind impacts are generally caused by large building masses extending substantially above their surroundings, and by buildings oriented such that a large wall catches a prevailing wind, particularly if such a wall includes little or no articulation. Based on a multitude of wind tunnel tests conducted for proposed buildings in San Francisco, buildings that are less than 80 feet tall typically do not result in substantial changes in ground-level winds.

The *San Francisco Planning Code* does not indicate wind impact criteria for the RH-2 use district and 50-X height and bulk district currently applicable to the project site. Best practice for CEQA wind hazard significance is to refer to Section 148 of the *Planning Code*, which is applicable to C-3 use districts located Downtown. Section 148 states that no exceptions for ground-level wind speeds shall be permitted for buildings that cause wind speeds to reach or exceed the 26-mile-per-hour (mph) wind hazard criterion for more than one hour per year. Therefore, the proposed project would have a significant wind impact under CEQA if it would cause the 26-mile-per-hour (mph) wind hazard criterion to be exceeded for more than one hour per year.

Existing wind speeds at the project site have not been quantified. The San Francisco Public Utilities Commission (SFPUC) wind monitoring station at Hillcrest Elementary School (810 Silver Avenue), which is half-a-mile east of the project site, indicates that average wind speeds were 9.7 miles per hour (mph) in 2012. At the monitoring station, about 40 percent of wind speed measurements exceeded the 11 mph pedestrian comfort criterion of Section 148 of the *San Francisco Planning Code*, which is applicable to Downtown areas of the City. Along with all of the urban development that exists upwind of the site, the neighborhood's topography and the site's mature trees, and the existing buildings on the project site create a surface roughness that reduces wind speeds.

The proposed buildings would be a maximum of about 80 feet above grade at the highest point. That height would not be expected to create a vertical surface sufficiently large to catch and direct substantial amount of winds down to pedestrian level on Mission Street. The 80-foot section would be small (perhaps 60 ft. by 40 ft.) and set back from Mission Street. The remainder of the new buildings would be about 45 to 65 feet tall. Per Figure 7, Site Perspective, the 80-foot section would have a canopy at the second level along Mission Street, which would preclude winds from flowing uninterrupted from the roof down the facade to the Mission Street sidewalk. The area immediately adjacent to and north of the 80-foot section (within the project site) would be landscaped and not a pedestrian area. The remainder of the Mission Street facade would be articulated, with numerous bays extending from the facade, which would interrupt winds that might otherwise flow down the facade from higher elevations; plus, it would be no more than 65 feet tall. With the exception of the 80-foot-tall portion of Building 1A, as indicated in Figure 4, the new buildings would be generally the same height as existing buildings. The new buildings would contribute to the surface roughness that would continue to reduce wind speeds as compared to an open, undeveloped site. The existing breezeways connecting Goodman Building, Koret Center, and Friedman Pavilion would remain, and they would continue to provide protection from winds running down the faces of these buildings.

Although the proposed new buildings would be taller than the existing Main Building on the site and could incrementally increase wind speeds within the campus, it is expected that the height would be insufficient to cause substantial increases in wind speeds (above existing conditions) or alter wind in a manner that results in a wind hazard or substantially affects public areas.

Buildings would be articulated with balconies and other fenestration that would further reduce wind speeds.

For the reasons above, changes in wind speeds due to the project would be considered to be *less than significant*.

Mitigation: None required.

Impact WS-2: The proposed project would not create new shadow in a manner that substantially affects outdoor recreation facilities or other public areas. (Less than Significant)

Section 295 of the *Planning Code* was adopted in response to Proposition K (passed November 1984) in order to protect certain public open spaces from shadowing by new structures during the period between one hour after sunrise and one hour before sunset, year round. Section 295 restricts new shadow upon public spaces under the jurisdiction of the San Francisco Recreation and Park Department (SFRPD) by any structure exceeding 40 feet unless the Planning Commission finds the impact to be insignificant upon consultation with the Recreation and Park Commission.

The closest public open space to the project site that falls under the jurisdiction of SFRPD is Cayuga and Lamartine Minipark, located 700 feet northwest of the project site between Lamartine Street, Cayuga Avenue, and Alemany Boulevard. Based on a shadow fan prepared by the San Francisco Planning

Department, the proposed project would not cast net new shadow on this open space or any other open space under the jurisdiction of SFRPD.⁸⁷

Shading of private properties in urban areas is common and generally not considered a physical effect on the environment under CEQA. In a densely built urban environment like San Francisco, shading of private properties occurs regularly. The proposed project buildings would cast shadow on the surrounding neighborhood, as well as upon the Jewish Home campus itself. The project would result in an increase in shading of some private properties, but this increase would be limited to specific time periods of the day and year. There are no formal outdoor recreational facilities on these private properties—including the Jewish Home—that would be affected.

In the early morning hours (between approximately 1 hour after sunrise and 3 hours after sunrise) all year, the new buildings at the southwest corner of the project site would cast shadow westward onto and across Mission Street. As the morning progresses, shadows would shorten and turn northward. From about midday (approximately 11:00 a.m. to 1:00 p.m.) onward, shadows would be cast onto the Jewish Home campus itself, including existing and new public spaces. During the late spring / early summer months, during the late afternoon and early evening (from approximately 4:00 p.m. to 2 hours before sunset), shadow would also be cast southeastward, across Avalon Avenue toward existing residential properties. The limited duration of this net new shadow onto the campus, sidewalks, and private properties would not be expected to substantially affect their use. The net new shadow on off-site properties would be of limited duration and extent, primarily confined to either the morning or evening hours.

The impact would be *less than significant* under CEQA because the proposed project would create new shadow in a manner that would not substantially affect outdoor recreation facilities or other public areas.

Mitigation: None required.

Impact C-WS-1: The proposed project, in combination with past, present, and reasonably foreseeable future projects, would not alter wind or create new shadow in a manner that substantially affects public areas. (Less than Significant)

Given that wind and shadow effects are highly location-dependent, the geographic context for cumulative wind and shadow effects encompasses the immediate project site vicinity—a few blocks (less than one-quarter of a mile) in each direction. It is in this vicinity that cumulative development, when combined with the proposed project, could have any effect on wind and shadow on the same locations.

Regarding cumulative wind impacts, as indicated under Impacts WS-1, above, the proposed project would result in less than significant wind effects because buildings would be below 80 feet in height and would have an articulation that would impede redirection of winds to ground level along Mission Street and within the Jewish Home campus. There are no reasonably foreseeable future developments in the cumulative geographic context that would contribute to cumulative wind effects in these same locations.

⁸⁷ San Francisco Planning Department. Shadow Fan, May 2015, Available for review at the Planning Department, 1650 Mission Street, Suite 400, in Case File No. 2011.1323E.

Regarding cumulative shadow impacts, the proposed project would result in less-than-significant shadow impacts because it would not shade parks or open spaces under the jurisdiction of SFRPD, and it would shade streets, sidewalks, and other public areas for a limited duration and extent, resulting in shadow conditions typical of urban areas. There are no other reasonably foreseeable future developments in the project site vicinity that would result in substantial new shadow on recreational features or other public areas.

For the reasons above, the cumulative wind and shadow impacts would be *less than significant*

Mitigation: None required.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
9. 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?	☐	☐	☐	☒	☐
c) Physically degrade existing recreational resources?	☐	☐	☒	☐	☐

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

The nearest major public open space to the project site is McLaren Park, located 0.4 miles southwest of the Jewish Home Campus. This 317-acre park's varied topography provides expansive views of the City in several directions. The park includes recreational amenities surrounding three primary areas--Herz Playground, the Tennis Complex, and the Louis Sutter Playground--as well as Gleneagles Golf Course:

- Herz Playground is at the southeast corner of the park. It includes the indoor Coffman Pool, two full-size basketball courts, a soccer field, a baseball diamond, and a large play area.
- The Tennis Complex is located on the crest of the park, at Mansell Street and Visitacion Avenue, about half a mile northeast of the project site. The complex includes six tennis courts.
- Louis Sutter Playground is about 0.65 miles north of the project site. It provides a community clubhouse, two baseball diamonds, two tennis courts, a basketball court, two play areas, a junior soccer field, and picnic tables. Lake McNab is a decorative water feature at this location.
- The nine-hole Gleneagles Golf Course is located on the southern side of the park.

McLaren Park also provides a network of 7 miles of paved and unpaved trails for hiking, biking, and jogging; an additional two half-size basketball courts; an irrigation reservoir; and 75 additional picnic tables for group picnics. SFRPD and the local community have created a plan to modify Mansell Street, which traverses the park from east to west, by implementing crosswalks, bike lanes, sidewalks, and other street design changes. The project has received grant funding and is anticipated to be under construction in 2015.⁸⁸ Additionally, SFRPD is working with local groups, including SF Urban Riders, to fund and develop a bicycle skills area (bike park, for mountain biking) on an undeveloped and largely unplanted area immediately on the north side of Sunnysdale Avenue immediately west of the project site. The Recreation and Park Commission approved a Community Opportunity Fund grant, providing partial funding for the bike park, on February 21, 2013.

In addition to McLaren Park, the closest public open space to the project site that falls under the jurisdiction of SFRPD is Cayuga and Lamartine Minipark, located 700 feet northwest of the project site between Lamartine Street, Cayuga Avenue, and Alemany Boulevard. Also, the 1.61-acre Excelsior Playground is located 0.43 miles south of the project site. The Excelsior Playground includes a ball field, playground, sandbox, basketball court, tennis court, and clubhouse.

The project would result in an estimated population increase of up to 245 permanent residents at the project site, as well as an increase of 135 employees and volunteers. While these additional populations may use surrounding parks and recreational facilities, the expected limited demand associated with the project's residential use is not likely to result in the need to expand or construct new facilities nor would the use of the aforementioned recreational facilities and parks by project residents cause physical deterioration of these spaces. Only a portion of the new residents would be physically able to visit nearby parks. Given new residents' age and health, it is unlikely that they would physically stress or otherwise overload these existing recreational facilities. In addition to the collection of services and user amenities proposed as part of the project "The Square" would offer residents on-site recreational opportunities, which could reduce potential off-site park visits. Therefore, this impact would be *less than significant*.

Mitigation: None required.

Impact RE-2: The proposed project would not include the construction or expansion of recreational facilities that would have a significant effect on the environment. (No Impact)

As described in the Project Description, implementation of the project would include, among other things, new landscaped areas, which may be used for passive recreation. Installation of this landscaping on site would not, in and of itself, cause significant environmental effects. The environmental impacts of project construction are analyzed throughout this Initial Study, including in Topics 5, Noise, and 6, Air Quality. The proposed recreational activities that could be offered as part of the "The Square" services would be located within the existing Rosenberg building and would not entail construction or expansion

⁸⁸ SFRPD, McLaren Park: Mansell Corridor Improvements, available online: <http://sfrecpark.org/project/mclaren-mansell-project/>, accessed December 2, 2013. Available for review at the Planning Department, 1650 Mission Street, Suite 400, in Case File No. 2011.1323E.

of recreational facilities. Therefore, the project would not result in the construction of recreational facilities that would themselves have a physical environmental impact, and there would be *no impact*.

Mitigation: None required.

Impact C-RE-1: The proposed project, in combination with past, present, and reasonably foreseeable future projects in the vicinity, would not result in considerable contribution to cumulative recreation impacts. (Less than Significant)

The geographic scope for potential cumulative recreation impacts encompasses the recreational facilities and parks in the vicinity of the Jewish Home, including McLaren Park, the Excelsior Playground, and Lamartine Minipark. Similar to the proposed project, projects within the vicinity would contribute to incremental demand for such recreational facilities and parks, which may increase the use of these facilities or result in physical deterioration of the facilities. The only major project in the vicinity that could increase the use of these parks is the Sunnydale-Velasco HOPE-SF Master Plan project, which would increase use of McLaren Park. However, that project would not result in a considerable contribution to cumulative impacts to recreational facilities because it would include its own 11.5 acres of usable open space, including 5.6 acres of new parks. The demand for recreational services would be dispersed among these new parks and the existing McLaren Park, as well as other nearby parks. It would not combine with demand for recreational facilities from the Jewish Home project to result in significant cumulative impacts. Therefore, it would not combine with the project to result in cumulative effects.

As stated above, the Jewish Home project would not result in substantial new users of existing recreational facilities, and residents that do patronize new facilities would be of an age and health that they would not physically stress the facilities. The project would not result in a considerable contribute to cumulative recreation impacts. Cumulative impacts would be *less than significant*.

Mitigation: None required.

<u>Topics:</u>	<u>Potentially Significant Impact</u>	<u>Less Than Significant with Mitigation Incorporated</u>	<u>Less Than Significant Impact</u>	<u>No Impact</u>	<u>Not Applicable</u>
10. UTILITIES AND SERVICE SYSTEMS— Would the project:					
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	☐	☐	☒	☐	☐
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☒	☐	☐
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☒	☐	☐

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
10. UTILITIES AND SERVICE SYSTEMS (continued)					
d) Have sufficient water supply available to serve the project from existing entitlements and resources, or require new or expanded water supply resources or entitlements?	☐	☐	☒	☐	☐
e) Result in a determination by the wastewater treatment provider that would serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐	☐
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	☐	☐	☒	☐	☐
g) Comply with federal, state, and local statutes and regulations related to solid waste?	☐	☐	☒	☐	☐

Impact UT-1: Implementation of the proposed project would not result in significant impacts to wastewater collection or treatment facilities or require new wastewater facilities, the construction of which could cause significant environmental impacts. (Less than Significant)

The project site is served by San Francisco's combined sewage system. The sewage system is designed to collect and treat both sanitary sewage and rainwater runoff in the same sewer and treatment plants. Wastewater treatment for the east side of the City is provided primarily by the Southeast Water Pollution Control Plant. The SFPUC approved Phase 1 of the Sewer System Improvement Program to improve the function of the wastewater system citywide on August 28, 2012.⁸⁹ Additional efforts are under way to address wastewater needs in the San Francisco capital improvement program (CIP) to reduce the potential for on-street flooding during heavy rains.

Operational Sanitary Flows. The new buildings would be designed to incorporate water-conserving measures, such as installing low-flush toilets and urinals, as required by Chapter 4 of the *California Plumbing Code*. Moreover, as buildings constructed to CalGreen standards, the proposed project would incorporate water-saving and waste management features that would reduce water consumption and wastewater generation to levels lower than those of comparable structures not built to CalGreen standards. While the proposed project would increase sanitary sewage flows in the area, these increases would be incremental and would not cause collection treatment capacity of the sewer system in the City to be exceeded. The proposed project would meet wastewater pre-treatment requirements of the SFPUC, as required by the San Francisco Industrial Waste Ordinance.⁹⁰ Additionally, the proposed project would be subject to the City's Wastewater Capacity Charge. As required, funds raised through the capacity charge would be directly used to offset the cost of future wastewater capital improvement projects and repairs.

⁸⁹ SFPUC, History of the SSIP, available online at <http://www.sfwater.org/index.aspx?page=609>, accessed September 10, 2013. Available for review at the Planning Department, 1650 Mission Street, Suite 400, in Case File No. 2011.1323E.

⁹⁰ San Francisco Public Works Code, Article 4.1 (amended by Ordinance No. 19-92, January 13, 1992).

Wastewater flows from residential and retail commercial uses are primarily a factor of indoor water use. A conservative wastewater flow factor of 95 percent of water demand was used based on San Francisco historical water demand to wastewater flow ratios.⁹¹ Using this ratio, the proposed project would generate approximately an additional 32,490 gpd, based upon the water demand calculated by the SFPUC Water Supply Assessment (see Impact UT-3, below). When added to existing demand, this would result in a total wastewater flow of 65,455 gpd.

The SFPUC's SEWPCP treats approximately 63 mgd during dry weather, and it has a total secondary-treatment capacity of 150 mgd. During dry weather there is adequate capacity for the wastewater flows from the proposed project.

Regarding wet weather flow, during large storm events that exceed the capacity of the SEWPCP, North Point Wet Weather Facility and Bayside Wet Weather Facilities, the City is permitted to discharge into the San Francisco Bay via combined sewer overflow structures.

The project sponsor would be required to prepare and implement a stormwater management plan to ensure there are no impacts to the surrounding stormwater collection system. Assuming that 32,490 net new gpd exits the site as wastewater, project wastewater flows would represent 0.02 percent of the secondary treatment wet weather capacity of the SEWPCP. This incremental increase would not exceed the capacity of the drainage system or the SEWPCP or contribute to a violation of current wastewater treatment and discharge requirements.

No new wastewater collection and treatment facilities would be required to serve the proposed project. The project would meet wastewater pre-treatment requirements of the SFPUC, as required by the San Francisco Industrial Waste Ordinance.⁹² While the proposed project would add to sewage flows in the area, it would not cause collection treatment capacity of the sewer system in the City to be exceeded.

Construction Groundwater Flows. As further explained under Topic 13, Geology and Soils, the depth to groundwater at the project site is generally between 19 and 28 feet below ground surface, although it has been encountered as high as 12 feet below ground surface. Therefore, the proposed project could require dewatering during construction activities. Any dewatering that occurs would be discharged into the City sewer system; this would require a permit pursuant to *Public Works Code* Article 4.1, which regulates the quantity and quality of discharges to the combined sewer system. *Public Works Code* Article 4.1 incorporates and implements the City's National Pollutant Discharge Elimination System (NPDES) permits. Generally, the City's requirements include the development of a stormwater pollution prevention plan (SWPPP), which includes an erosion and sediment control plan, and review of that plan by SFPUC. The *San Francisco Public Works Code* also requires the use of BMPs during the construction and operational periods. However, this discharge would be temporary in nature and would not generate additional wastewater that would require the construction of new, or expansion of existing, wastewater facilities. In light of the above, the

⁹¹ City and County of San Francisco, 2030 Sewer System Master Plan, Task 100 Technical Memorandum No. 102 Wastewater Flow and Load Projections, Final Draft August 2009. This document is available for review at the Planning Department, 1650 Mission Street, Suite 400, in Case File No. 2010.0305E.

⁹² *San Francisco Public Works Code*, Article 4.1 (amended by Ordinance No. 19-92, January 13, 1992).

proposed project would not exceed wastewater treatment requirements of the Regional Water Quality Control Board, and it would have a *less than significant* impact with regard to this criterion. The project would not require the construction of new wastewater treatment facilities or expansion of existing ones, and it would have a *less than significant* impact with regard to requiring new wastewater facilities that could result in significant environmental effects.

Mitigation: None required.

Impact UT-2: Implementation of the proposed project would not require new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. (Less than Significant)

The design of site landscaping, parking lot coverage, and other features has not been finalized. Given the proposed project would remove existing buildings and a portion of the existing parking lot, and replace them with two new buildings and an additional access driveway, it may result in an increase in impervious surfaces.

The project would implement a stormwater management plan that results in a 25 percent decrease in the volume of stormwater runoff from the two-year 24-hour design storm, through the use of low-impact design features to capture stormwater runoff. The proposed project would be required to meet the standards for stormwater management identified in the San Francisco Stormwater Management Ordinance and would be designed to meet the San Francisco *2010 Stormwater Design Guidelines*, which would reduce the total stormwater runoff volume and peak stormwater runoff rate through the use of low impact designs approaches and BMPs including landscape planters designed to capture rain water. The project sponsor would be required to submit for SFPUC's approval a Stormwater Control Plan that complies with the stormwater design guidelines, and implementation of the plan would ensure that the project meets performance measures set by the SFPUC related to storm water runoff rate and volume. Since the proposed project would not substantially increase the amount of impervious surfaces, it would not create a substantial amount of additional runoff water. Therefore, the proposed project would not require or result in the construction of a new or expansion of an existing storm drainage facility, and the impact would be *less than significant*.

Mitigation: None required.

Impact UT-3: The SFPUC has sufficient water supply and entitlements to serve the proposed project, and implementation of the proposed project would not require expansion or construction of new water treatment facilities. (Less than Significant)

Water for the proposed project is provided by the SFPUC, which provides both water supply and wastewater collection and treatment. On June 14, 2011, the SFPUC adopted the *2010 Urban Water Management Plan* (UWMP) for the City and County of San Francisco. The UWMP includes citywide demand projections to the year 2035, compares available water supplies to meet demands, and presents water demand management measures to reduce long-term water demand. In May 2013, SFPUC updated

citywide water supply and demand projections with the 2013 *Water Availability Study* (WAS).⁹³ According to the WAS, available water supply in 2015 will be 83.5 mgd. Retail water use⁹⁴ will be 83.7 mgd in 2015, comprising 78.1 mgd of in-City retail and irrigation use and 5.6 mgd of suburban retail use. Total retail demand is expected to hold relatively steady, at 83.4 mgd in 2020 and 84.2 mgd in 2035, with the relatively small increase in demand due primarily to expected growth in business and industry. The SFPUC plans to augment local supplies by extracting up to 4 mgd of groundwater from new wells in the City's Westside Groundwater Basin, as well as 4.0 mgd of recycled water from new recycled water projects. Total retail supply is expected to increase to 90.3 mgd by 2035.⁹⁵

The SFPUC updated forecasts for future water demand using updated Planning Department forecasts based on the ABAG and Metropolitan Transportation Commission (MTC) Bay Area Sustainable Communities Strategy "Land Use Allocation," which was released in 2012. According to the WAS, the SFPUC can meet the current and future water demand in years of average or above-average precipitation. It can also meet future water demand in single-dry-year and multiple-dry-year events, with the exception of 2015. With the Water Shortage Allocation Plan in place, and the addition of local supplies developed under the SFPUC Water System Improvement Program, the SFPUC concluded that it has sufficient water available to serve existing customers and planned future uses.⁹⁶

In response to Governor Brown's declaration of a drought state of emergency in January 2014, SFPUC asked all consumers to voluntarily curtail water consumption by 10 percent. In April 2015, the Governor signed Executive Order B-29-15, which stated that the State Water Resources Control Board (SWRCB) shall impose restrictions to achieve a statewide 25 percent reduction in potable urban water usage through February 2016.⁹⁷ The SWRCB adopted emergency regulations in May 2015, which requires SFPUC to achieve an 8 percent conservation standard through February 2016.⁹⁸

SFPUC's call for a 10 percent reduction in water use remains in effect.⁹⁹ Through active conservation and plumbing code requirements, SFPUC anticipates the potential to reduce water demands by 14 mgd by

⁹³ SFPUC, 2013 *Water Availability Study* for the City and County of San Francisco, March 2013.: <http://sfwater.org/index.aspx?page=75>, accessed December 27, 2013. Available for review at the Planning Department, 1650 Mission Street, Suite 400, in Case File No. 2011.1323E.

⁹⁴ Retail water use is distinguished from wholesale use, under which the SFPUC provides potable water to suburban water agencies throughout the San Francisco Bay Area.

⁹⁵ SFPUC, 2013 *Water Availability Study* for the City and County of San Francisco, March 2013. Available online at: <http://sfwater.org/index.aspx?page=75>, accessed December 27, 2013. Available for review at the Planning Department, 1650 Mission Street, Suite 400, in Case File No. 2011.1323E.

⁹⁶ SFPUC, 2010 *Urban Water Management Plan* for City and County of San Francisco, adopted June 14, 2011. Available for review at the Planning Department, 1650 Mission Street, Suite 400, in Case File No. 2011.1323E.

⁹⁷ SWRCB, Executive Order B-29-15, available online: http://www.waterboards.ca.gov/waterrights/water_issues/programs/drought/docs/040115_executive_order.pdf, accessed May 7, 2015. Available for review at the Planning Department, 1650 Mission Street, Suite 400, in Case File No. 2011.1323E.

⁹⁸ SWRCB, *Urban Water Suppliers and Regulatory Framework Tiers to Achieve 25% Use Reduction*, available online: http://www.waterboards.ca.gov/waterrights/water_issues/programs/drought/docs/emergency_regulations/supplier_tiers_20150428.pdf, April 23, 2015. Available for review at the Planning Department, 1650 Mission Street, Suite 400, in Case File No. 2011.1323E.

⁹⁹ SFPUC, Conservation, web page: <http://www.sfwater.org/index.aspx?page=136>, accessed May 7, 2015. Available for review at the Planning Department, 1650 Mission Street, Suite 400, in Case File No. 2011.1323E.

2018 and 23 mgd by 2035.¹⁰⁰ In response to the continued drought, the State Water Resources Control Board adopted expanded emergency regulations on March 17, 2015. These regulations prohibit washing of sidewalks and driveways, watering in a manner that causes excess runoff, operative a decorative water feature, watering lawns during and 48 hours following measurable precipitation, and serving water in restaurants (unless asked), among other standards. Outdoor irrigation restrictions are also required for all urban water suppliers.¹⁰¹

The Jewish Home currently uses an average of approximately 12.6 million gallons of water per year, or 34,700 gpd.¹⁰² With 374 existing residents and 509 employees and volunteers, that translates to 39.3 gpd per capita. This water demand is substantially less than the statewide average of 1,236 gpd per capita of medical buildings and hospitals statewide.¹⁰³

According to the SFPUC, in 2015, consumers will use an average of 90 gpd per capita, which is projected to drop to 80 gpd by 2035.^{104,105} The proposed project would increase the on-site population by up to 245 residents, as well as up to 135 employees and volunteers. Conservatively assuming that all of these additional residents, employees, and volunteers would be new consumers to the SFPUC system, the project would generate net new demand for about 34,200 gpd in 2015, and 30,400 gpd in 2035. This increased demand would represent 0.04 percent (four hundredths of 1 percent) of projected total demand of 83.7 mgd in 2015, and 0.04 percent of projected total demand of 84.2 mgd in 2035. Sufficient water supply would be available from existing entitlements.

No new water delivery facilities would be required to serve the proposed project. The proposed project would be subject to the City's Commercial Water Conservation Ordinance, which is designed to minimize water use, and would be designed to incorporate water-conserving measures, such as low-flush toilets and urinals, as required by the water conservation ordinances and Chapter 4 of the *California Plumbing Code*. As required by the City's Commercial Water Conservation Ordinance the proposed project would utilize high-efficiency water fixtures. Therefore, the proposed project would incorporate required water-saving features that would reduce water consumption. Since the proposed project would have sufficient water supply available from existing entitlements, it would not require new water supply or water treatment facilities, and this impact would be *less than significant*.

¹⁰⁰ SFPUC, Water Supply Update, available online: <http://sfwater.org/index.aspx?page=760>, accessed February 19, 2015. Available for review at the Planning Department, 1650 Mission Street, Suite 400, in Case File No. 2011.1323E.

¹⁰¹ SWRCB, Media Release: State Water Board Expands and Extends Emergency Water Conservation Regulation, available online: http://www.swrcb.ca.gov/press_room/press_releases/2015/pr031715_renewed_emergency_wtr_regs.pdf, March 17, 2015. Available for review at the Planning Department, 1650 Mission Street, Suite 400, in Case File No. 2011.1323E.

¹⁰² SFPUC, San Francisco Water, Power and Sewer, Summary of Charges, December 2013, January 2014, February 2014, March 2014, May 2014, July 2014, August 2014, Sept 2014.

¹⁰³ Aquacraft, Inc., *Embedded Energy in Water Studies Study 3: End-use Water Demand Profiles*, prepared for the California Public Utilities Commission Energy Division, April 29, 2011.

¹⁰⁴ SFPUC, 2013 Water Availability Study for the City and County of San Francisco, March 2013. Available online at: <http://sfwater.org/index.aspx?page=75>, accessed December 27, 2013. Available for review at the Planning Department, 1650 Mission Street, Suite 400, in Case File No. 2011.1323E.

¹⁰⁵ SFPUC indicates that residential per capita water use is actually 49 gpd, per the Water Supply Update: <http://sfwater.org/index.aspx?page=760>. However, the higher consumption rates are presented here to provide a conservative analysis.

Mitigation: None required.

Impact UT-4: The proposed project would be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs. (Less than Significant)

San Francisco uses a three-cart collection program: residents and businesses sort solid waste into recyclables, compostable items such as food scraps and yard trimmings, and garbage. The City's Mandatory Recycling and Composting Ordinance (Ordinance 100-09) requires everyone in San Francisco to separate their refuse into recyclables, compostables, and trash. Recology (formerly Norcal Waste Systems, Inc.) provides solid waste collection, recycling, and disposal services for residential and commercial garbage, recycling, and composting in San Francisco through its subsidiaries San Francisco Recycling and Disposal, Golden Gate Disposal and Recycling, and Sunset Scavenger. Materials collected are hauled to the Recology transfer station/recycling center on Tunnel Avenue, near the southeastern city limit, for sorting and subsequent transportation to other facilities. Recyclable materials are taken to Recology's Pier 96 facility, where they are separated into commodities (e.g., aluminum, glass, and paper) and transported to other users for reprocessing. Compostables (e.g., food waste, plant trimmings, soiled paper) are transferred to a Recology composting facility in Solano County, where they are converted to soil amendment and compost. The remaining material that cannot otherwise be reprocessed ("trash") is transported to, and disposed of at, the Altamont Landfill in Alameda County.

The Altamont Landfill has a permitted peak maximum daily disposal of 11,150 tons per day and accepted 1.45 million tons in 2013.¹⁰⁶ The landfill has an estimated remaining capacity of approximately 46 million cubic yards or 74 percent of its permitted capacity. The estimated closure date of the landfill is January 2025.¹⁰⁷ In 2013, San Francisco generated approximately 476,400 tons of solid waste and sent approximately 372,300 tons to the Altamont Landfill, about 26 percent of the total volume of waste received at that facility.¹⁰⁸

In 1988, San Francisco contracted for the disposal of 15 million tons of solid waste at the Altamont Landfill. The City contract with the Altamont Landfill expires around 2016. In 2009, the City announced that it could award its landfill disposal contract to a Recology subsidiary for shipment of solid waste by truck and rail to the Recology Ostrom Road Landfill in Yuba County. This facility has an expected closure date of 2066 with

¹⁰⁶ CalRecycle, "2013 Landfill Summary Tonnage Report". Available online at: <http://www.calrecycle.ca.gov/SWFacilities/Landfills/tonnages>; accessed October 23, 2014. Available for review at the Planning Department, 1650 Mission Street, Suite 400, in Case File No. 2011.1323E.

¹⁰⁷ CalRecycle, "Active Landfills Profile for Altamont Landfill and Resource Recovery (01-AA-0009)". Available online at: <http://www.calrecycle.ca.gov/SWFacilities/Directory/01-AA-0009/Detail/>, accessed on May 28, 2014. Available for review at the Planning Department, 1650 Mission Street, Suite 400, in Case File No. 2011.1323E.

¹⁰⁸ Data includes only landfilled waste. Most of the City's remaining solid waste was sent to the Ox Mountain Landfill in San Mateo County. CalRecycle, Single-year Countywide Origin Detail, 2012, San Francisco. Available online at: <http://www.calrecycle.ca.gov/LGCentral/Reports/Viewer.aspx?P=OriginJurisdictionIDs%3d438%26ReportYear%3d2013%26ReportName%3dReportEDRSJurisDisposalByFacility>. Reviewed October 23, 2014. Available for review at the Planning Department, 1650 Mission Street, Suite 400, in Case File No. 2011.1323E.

a total design capacity of over 41 million cubic yards.¹⁰⁹ The ultimate determination with respect to future landfill contracting will be made by the Board of Supervisors on the basis of solid waste planning efforts being undertaken by the City's Department of the Environment. In the interim period between the termination of the contract at the Altamont Landfill and the determination regarding the Ostrom Road Landfill, the City is planning for transportation of solid waste to the Recology Hay Road Landfill located in unincorporated Solano County, near Vacaville, where it would be disposed. San Francisco and Recology intend to enter into an agreement for a duration of up to 10 years. Waste would be transported by long haul semi-trucks primarily from the Recology San Francisco transfer station located at 501 Tunnel Road, with several trucks hauling residual wastes for disposal from Recology's Recycle Central facility, located at Pier 96 in San Francisco. The Hay Road Landfill is permitted by Solano County and CalRecycle to accept up to 2,400 tons per day of solid waste for disposal, and to receive up to 620 vehicles per day (averaged over a 7-day week). The landfill is permitted to operate up to 24 hours per day, 7 days per week. The facility has capacity to accommodate municipal solid waste until approximately 2050.

Recycling, composting, and waste reduction are expected to increasingly divert waste from the landfill, per California and local requirements. The City was required by the State's Integrated Waste Management Act (AB 939) to divert 50 percent of its waste stream from landfill disposal by 2000. The City met this threshold in 2003 and has since increased it to 69 percent in 2005 and 70 percent in 2006. The City of San Francisco estimates that it diverted 80 percent of its waste from landfills in 2011.¹¹⁰ The City's per resident disposal target rate is 6.6 pounds per person per day (PPD), and its per employee disposal target rate is 10.6 PPD. In 2012, which is the most recent date for which data are available, the measured disposal rate was 2.9 PPD for residents and 4.2 PPD for employees, thereby meeting the City's target rates.¹¹¹

Regardless of whether San Francisco renews its contract with the Altamont Landfill, switches to the Ostrom Road Landfill, or selects another facility, the proposed project would be subject to the City's Mandatory Recycling and Composting Ordinance, which requires the separation of refuse into recyclables, compostables, and trash, thereby minimizing solid waste disposal and maximizing recycling and composting. Although the proposed project would incrementally increase total waste generation from the City by increasing the size of the Jewish Home facility and the number of residents and neighborhood elderly served, the increasing rate of diversion through recycling and other methods would result in a decreasing share of total waste that requires deposition into the landfill. Given this, and given the existing and potential future long-term capacity available at the applicable landfill(s), the solid waste generated by the proposed project during operation would not result in the landfill exceeding its permitted capacity, and the proposed project would result in a *less-than-significant* solid waste generation impact.

¹⁰⁹ San Francisco is currently participating as a responsible agency in the environmental review process that Yuba County has begun for the Recology Ostrom Road Green Rail and Permit Amendment Project and to conduct CEQA review of San Francisco's proposal to enter into one or more new agreements with Recology. On March 28, 2013, Yuba County and San Francisco entered into a Cooperative Agreement to designate Yuba County as the lead agency for this project and to outline their cooperative efforts concerning environmental review.

¹¹⁰ San Francisco Office of the Mayor, *Mayor Lee Announces San Francisco Reaches 80 Percent Landfill Waste Diversion, Leads All Cities in North America*, Press Release: October 5, 2012. Available for review at the Planning Department, 1650 Mission Street, Suite 400, in Case File No. 2011.1323E.

¹¹¹ CalRecycle, Jurisdiction Diversion / Disposal Rate Summary, available online: <http://www.calrecycle.ca.gov/LGCentral/DataTools/Reports/DivDispRtSum.htm>, accessed October 23, 2014. Available for review at the Planning Department, 1650 Mission Street, Suite 400, in Case File No. 2011.1323E.

As described in the Project Description, construction activities would result in an estimated 19,500 cubic yards of excess soils from the excavation activities at the location of proposed building footings and foundations. Excavated soil would be taken to an appropriate facility for recycling, reuse, or disposal. The proposed project would be subject to the City's Construction and Demolition Debris Recovery Ordinance, which requires all construction and demolition debris to be transported to a registered facility that can divert a minimum of 65 percent of the material from landfills. This requirement has been augmented by the Green Building Ordinance, which requires that at least 75 percent of C&D debris be diverted from landfills. The Altamont Landfill and Corinda Los Trancos Landfill are registered facilities available to accept waste from San Francisco that could accept excess soils generated during construction. The Corinda Los Trancos Landfill is permitted to receive 3,598 tons of waste per day; it has a remaining capacity of approximately 44.6 million cubic yards and with this capacity, the landfill can operate until 2018.¹¹² Because the proposed project would be consistent with City ordinances and because the local landfills would have sufficient capacity to accept the remaining construction waste, the proposed project would be served by landfills with sufficient permitted capacity to accommodate the project's solid waste disposal needs.

This impact would be *less than significant*.

Mitigation: None required.

Impact UT-5: Construction and operation of the proposed project would follow all applicable statutes and regulations related to solid waste. (Less than Significant)

The California Integrated Waste Management Act of 1989 (AB 939) requires municipalities to adopt an Integrated Waste Management Plan (IWMP) to establish objectives, policies, and programs relative to waste disposal, management, source reduction, and recycling. Reports filed by the San Francisco Department of the Environment show that the City generated approximately 870,000 tons of waste material in 2000. By 2010, that figure decreased to approximately 455,000 tons. Waste diverted from landfills is defined as recycled or composted. San Francisco has a goal of 75 percent landfill diversion by 2010, and 100 percent by 2020.¹¹³ As of 2012, 80 percent of San Francisco's solid waste was being diverted from landfills, having met the 2010 diversion target.¹¹⁴

The San Francisco Construction and Demolition Ordinance (Ordinance No. 27-06) requires a minimum of 65 percent of all construction and demolition debris to be recycled and diverted from landfills. This requirement has been augmented by the Green Building Ordinance, which requires that at least 75 percent

¹¹² CalRecycle, Facility/Site Summary Details: Corinda Los Trancos Landfill (Ox Mtn) (41-AA-0002), Available online at <http://www.calrecycle.ca.gov/SWFacilities/Directory/41-AA-0002/Detail/>, accessed September 10, 2014. Available for review at the Planning Department, 1650 Mission Street, Suite 400, in Case File No. 2011.1323E.

¹¹³ San Francisco Department of the Environment, Zero Waste FAQ. Available online at <http://www.sfenvironment.org/zero-waste/overview/zero-waste-faq>. Accessed on December 27, 2013. Available for review at the Planning Department, 1650 Mission Street, Suite 400, in Case File No. 2011.1323E.

¹¹⁴ San Francisco Department of the Environment, *Recology & City Recycling & Compost Program Creates Jobs, Stimulates Growth of Green Economy & Supports City's 2020 Zero Waste Goal*, October 5, 2012. Available online at <http://www.sfenvironment.org/news/press-release/mayor-lee-announces-san-francisco-reaches-80-percent-landfill-waste-diversion-leads-all-cities-in-north-america>. Accessed November 14, 2013. Available for review at the Planning Department, 1650 Mission Street, Suite 400, in Case File No. 2011.1323E.

of C&D debris be diverted from landfills. Furthermore, the proposed project would be required to comply with the City's Ordinance 100-09, the Mandatory Recycling and Composting Ordinance, which requires separation of refuse into recyclables, compostables, and trash.

As discussed in Section E.15, Hazards and Hazardous Materials, soils from excavation activities, as well as building materials (e.g., fluorescent lights) could be classified as a California hazardous waste. Accordingly, the proposed project would be required to follow state and federal regulations for the disposal of hazardous wastes and would be transported to a permitted disposal or recycling facility.

Regarding medical waste, the Jewish Home would continue to dispose of this waste in accordance with requirements for Small Disposal Generators under the Resource Recovery and Conservation Act. It has policies and procedures in place for medication destruction, as well as disposal of infection medical waste. The facility has an ongoing agreement with a medical waste pickup and disposal provider, and this agreement would continue with operation of the proposed project.^{115,116,117}

The proposed project would comply with all applicable local, state, and federal laws and regulations pertaining to solid waste, and the impact would be *less than significant*.

Mitigation: None required.

Impact C-UT-1: In combination with past, present, and reasonably foreseeable future development in the project site vicinity, the proposed project would have a less-than-significant cumulative impact on utilities and service systems. (Less than Significant)

The geographic scope for potential cumulative wastewater systems impacts encompasses the City and County of San Francisco. Wastewater system facilities in the project vicinity include the San Francisco's combined sewage system and the Southeast Water Pollution Control Plant. Similar to the proposed project, projects within the vicinity would utilize the same wastewater systems, which increase the demand on such facilities.

Like the proposed project, cumulative projects in the area would be subject to the City's Wastewater Capacity Charge. The Wastewater Capacity Charge funds the cost of expansion of the wastewater conveyance and treatment system, if necessary. All funds raised through the capacity charge are directly used to offset the cost of future wastewater capital improvement projects and repairs. Furthermore, cumulative projects would utilize high-efficiency water fixtures as required by the City's Commercial Water Conservation Ordinance or Green Building Ordinance, as applicable, which would further decrease the amount of wastewater and water entering treatment facilities. Therefore, the potential for projects to result in combined effects exists, but it is lower than would be due to existing regulations.

¹¹⁵ Jewish Home of San Francisco, Disposal of Infectious Waste, April 17, 1996.

¹¹⁶ Jewish Home of San Francisco, Disposal of Medications and Medication-Related Supplies, January 28, 2010.

¹¹⁷ Jewish Home of San Francisco, Steri-Safe Service Agreement, signed July 17, 2009.

The proposed project, like cumulative projects, would utilize low impact design features to comply with the Stormwater Ordinance. Project designs would be required meet the San Francisco *2010 Stormwater Design Guidelines*, which would reduce the total stormwater runoff volume and peak stormwater runoff rate through the use of low impact designs approaches and other BMPs. As noted above the proposed project would comply with all applicable regulations, and would reuse wastewater, and reduce operational discharges to the combined sewer. Therefore its contribution to San Francisco's combined sewer system would not be cumulatively considerable, and the impact would be *less than significant*.

The geographic scope for potential cumulative water supply impacts encompasses the SFPUC water supply system. SFPUC water supply system supplies the City and County of San Francisco as well as others in the region with water. Similar to the proposed project, projects within the vicinity or the region would require the use of the SFPUC water supply.

Like the proposed project, cumulative projects in the area would be subject to the City's Commercial Water Conservation Ordinance or Green Building Ordinance, as applicable, which requires project to utilize high-efficiency water fixtures to offset the need for water. In addition, cumulative projects in the vicinity would be subject to the Recycled Water Ordinance. Although projects could result in effects that could combine to result in cumulative impacts, these requirements would cumulatively reduce the increase demand for water. The proposed project, in addition to cumulative projects in the region, would incrementally increase demand on the water supply. However, as discussed above, SFPUC has available water supply to serve existing and projected growth. Therefore, cumulative impacts to the SFPUC water system would be *less than significant*.

The geographic scope for potential cumulative waste generation impacts encompasses Recology and those jurisdictions that haul and dump their waste at the Altamont Landfill in Alameda County and Ostrom Road Landfill in Yuba County, as well as the Hay Road Landfill in Solano County. Similar to the proposed project, projects within the vicinity, or jurisdictions that have contracts with these landfills, would affect the landfills' capacity by hauling and dumping their waste. Therefore, the potential exists for combined effects.

Increased waste generation from the proposed project and cumulative developments would be partially offset by existing San Francisco ordinances and policies regarding waste reduction. The increasing rate of diversion through recycling, composting, and other methods would result in a decreasing share of total waste that requires deposition in local landfills. As stated under Impact UT-4, Ostrom Road Landfill (Yuba County) is anticipated to be the future disposal site of all solid waste collected in the City.¹¹⁸ The total permitted capacity of the landfill is approximately 41 million cubic yards with an estimated closure date of 2066.

¹¹⁸ City and County of San Francisco Board of Supervisors, 2011 (July 26). Resolution No. 322-11: Resolution Approving a Ten-Year Landfill Disposal Agreement and Facilitation Agreement with Recology San Francisco under Chapter Section 9.118. Available online at: <http://www.sfbos.org/ftp/uploadedfiles/bdsupvrs/resolutions11/r0322-11.pdf>, accessed September 10, 2013.

Therefore, the increased generation of solid waste from the proposed project and nearby proposed cumulative development would not exceed the permitted landfill capacity, and this impact would be *less than significant*.

In summary, the project's contribution to wastewater generation, water demand, and solid waste processing and disposal would not be considerable, regardless of whether this contribution is considered in isolation (Impacts UT-1 through UT-5) or in conjunction with past, present, and reasonably foreseeable future projects. The impact would be *less than significant*.

Mitigation: None required.

Topics:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Not Applicable
11. PUBLIC SERVICES— Would the project:					
a) Result in substantial adverse physical impacts associated with the provision of, or the 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 public services such as fire protection, police protection, schools, parks, or other services?	☐	☐	☒	☐	☐

The proposed project's impacts to parks are analyzed in Section E.9, Recreation, on page 100.

Impact PS-1: The proposed project would not increase demand for police protection and fire protection to an extent that would require new or physically altered governmental facilities, the construction of which could cause significant environmental impacts. (Less than Significant)

The project site currently receives emergency services from the San Francisco Fire Department, Station 15 at 1000 Ocean Avenue, which is 1.15 miles west of the project site, Station 32 at 194 Park Street, which is 0.75 miles northeast of the project site, and Station 43 at 720 Moscow Street, which is 0.8 miles south of the project site,¹¹⁹ as well as the San Francisco Police Department, Ingleside Station, at 1 Sgt. John V. Young Lane, which is 0.75 miles west of the project site.¹²⁰

The proposed project would add 245 residents to the existing facility and operation of a new neighborhood-serving health and wellness facility (The Square). These changes would employ up to 135 additional workers (and volunteers). The proposed structures would be subject to, and would comply with, the

¹¹⁹ San Francisco Fire Department, website: <http://www.sf-fire.org/>, accessed online on September 19, 2013. Available for review at the Planning Department, 1650 Mission Street, Suite 400, in Case File No. 2013.154E.

¹²⁰ San Francisco Police Department, website: <http://sf-police.org/index.aspx?page=812>, accessed August 20, 2014. Available for review at the Planning Department, 1650 Mission Street, Suite 400, in Case File No. 2013.154E.

regulations of the *California Fire Code*, which establishes requirements pertaining to fire protection systems, including the provision of state-mandated smoke alarms, fire extinguishers, appropriate building access, and emergency response notification systems. This increased population could result in an incremental increase in demand for fire and police protection services, but not in excess of amounts expected and provided for in this area. No new or physically altered facilities would be required.

Given that the proposed project is located near, and already served by, existing police and fire protection services, the proposed new structures would be required to comply with fire codes, and the proposed project would only incrementally increase permanent resident populations in the area, impacts to police and fire services would be *less than significant*.

Mitigation: None required.

Impact PS-2: The proposed project would not substantially increase the population of school-aged children and would not require new or physically altered school facilities. (Less than Significant)

The San Francisco Unified School District (SFUSD) provides school services to residents in the project vicinity. The proposed project would not result in the construction of new units for families with children. All new units would be for senior citizens who are not anticipated to have school-age children. As described in the Population and Housing analysis, the 135 additional employees and volunteers at the project site could be new employees and volunteers living in San Francisco. These employees and volunteers could have children that would attend local schools. However, most of these additional employees and volunteers are likely to be residents of San Francisco or the Bay Area and the number of additional school-age children associated with them would be very small compared to the total SFUSD enrollment. Therefore, the proposed project would not increase the population of school-aged children to the extent that new school facilities would be required, and the project would have a *less-than-significant* impact to schools.

Mitigation: None required.

Impact PS-3: The proposed project would not increase demand for other government services to the extent that it would require new or physically altered government facilities. (Less than Significant)

Although the project would increase the residential and service population (employees, volunteers, and visitors) of the Jewish Home, this increased population would not generate substantial new demand for libraries, community centers, and other public facilities to the extent that new or physically altered facilities would be required, partially because some of these services are provided on site, and partially because the increased population is too small to justify planning, design, funding, and construction of new facilities. Therefore, the proposed project would have a *less-than-significant* impact on other government services.

Mitigation: None required.

Impact C-PS-1: The proposed project, in combination with past, present, and reasonably foreseeable future projects in the vicinity, would not result in a cumulatively considerable impact to public services. (Less than Significant)

The geographic scope for potential cumulative public services impacts encompasses public service providers in the vicinity of the Jewish Home. Public services in the project vicinity include services provided by the San Francisco Police Department, San Francisco Fire Department, SFUSD, and City and County of San Francisco. Similar to the proposed project, projects within the vicinity would utilize services provided by these departments. Given the relatively few new developments in this area of the city, the potential for combined effects on public services is low. The proposed project's increase in employment and residential population would incrementally increase demand for public services, but this increase would not be cumulatively considerable because the increase in demand in combination with demands project for other public services would not be beyond levels anticipated and planned for in the project site vicinity. For these reasons, the proposed project would not result in a considerable contribution to cumulative public service impacts, and this impact would be *less than significant*.

Mitigation: None required.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
12. 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 as defined by Section 404 of the Clean Water Act (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?	☐	☐	☒	☐	☐

Topics:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Not Applicable
12. BIOLOGICAL RESOURCES (continued)					
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 is located in an urban area that does not contain sensitive or protected habitat and generally does not provide suitable habitat for special-status species. The project area does not include riparian habitat or other sensitive natural communities as defined by the California Department of Fish and Wildlife and the United States Fish and Wildlife Service; therefore, the proposed project would have **no impact** on riparian habitat. In addition, the project area does not contain any wetlands as defined by Section 404 of the Clean Water Act; therefore the project would have **no impact** on wetlands. Moreover, the proposed project does not fall within any local, regional or state habitat conservation plans; therefore, Topic E.12(f) is not applicable to the proposed project.

Impact BI-1: The proposed project would not have a substantial adverse effect on special-status species or interfere with native resident or migratory wildlife. (Less than Significant)

A review of the California Natural Diversity Database (CNDDB) was conducted for historic occurrences of listed species within the San Francisco North USGS 7.5-minute quadrangle (in which the project site is located) and the surrounding quadrangles.¹²¹ The project site is located in a developed area that is primarily covered by paved, impervious surfaces and thus most of the listed species identified in the records search have been extirpated from this area. With the exception of trees and landscaped areas, the project area does not support or provide habitat for any known rare or endangered species and project development would not interfere with any resident or migratory species. The project would entail demolition and construction of buildings within the confines of the project site. The proposed project would result in buildings up to 80 feet above ground, which would not alter species movement or migratory corridors because the site is not located in such an area. The project would not conflict with any local policies or ordinances directed at protecting biological resources. Tree protection regulations are discussed separately under Impact BI-2, below.

The San Francisco Board of Supervisors adopted *Standards for Bird-Safe Buildings, Planning Code* Section 139, on July 14, 2011.¹²² The Standards for Bird-Safe Buildings include guidelines for use and types of glass and façade treatments, wind generators and grates, and lighting treatments. The project would be subject to the Standards for Bird-Safe Buildings. The project would also be required to comply

¹²¹ California Department of Fish and Wildlife, 2013. California Natural Diversity Database, web site: <https://map.dfg.ca.gov/bios/?tool=cnddbQuick>, accessed June 13, 2014. Available for review at the Planning Department, 1650 Mission Street, Suite 400, in Case File No. 2011.1323E.

¹²² San Francisco Planning Department, *Standards for Bird-Safe Buildings*, July 2011. Available online at http://www.sf-planning.org/ftp/files/publications_reports/bird_safe_bldgs/Standards_for_Bird-Safe_Buildings_8-11-11.pdf. Accessed September 7, 2011.

with the *California Fish and Game Codes* and the *Migratory Bird Treaty Act* (MBTA) which protect special-status bird species.

Existing street and on-site trees could support native nesting birds protected under the *California Fish and Game Code* or the MBTA. Although the majority of these existing trees would not be directly affected by construction activities, the activities could occur during the breeding season. However, compliance with the requirements of the *Fish and Game Code* and the MBTA would ensure that there would be no loss of active nests or bird mortality. These requirements include one or more of the following if construction takes place during the bird nesting season (January 15–August 15):

- Preconstruction surveys conducted by a qualified biologist no more than 15 days prior to the start of work during the nesting season to determine if any birds are nesting in or in the vicinity of the vegetation to be removed or construction to be undertaken.
- Avoidance of any nests identified and the establishment by the qualified biologist of a construction-free buffer zone, to be maintained until nestlings have fledged.

Given the foregoing, effects on special-status species, including those protected by the *California Fish and Game Codes* and the MBTA, would be *less than significant*.

Mitigation: None required.

Impact BI-2: The proposed project would not conflict with the City’s local tree ordinance. (Less than Significant)

The project site contains a total of 290 individual trees of large diameter (diameter of 4 inches or greater at breast height), comprising 27 different species.¹²³ The San Francisco Planning Department, Department of Building Inspection (DBI), and Department of Public Works (DPW) have established guidelines to ensure that legislation adopted by the Board of Supervisors governing the protection of trees is implemented. *DPW Code* Section 8.02-8.11 requires disclosure and protection of landmark, significant, and street trees, collectively referred to as “protected trees,” located on private and public property.

- A significant tree is one that is either on property under the jurisdiction of the DPW or on privately owned land within 10 feet of the public-right-of-way, that is greater than 20 feet in height, with a canopy greater than 15 feet in diameter, or with a trunk diameter greater than 12 inches at breast height. The Jewish Home campus currently has 55 significant trees.¹²⁴ Based on final project design, the project sponsor would obtain a Tree Removal Permit from DPW for removal of significant trees in the southwest portion of the campus to allow for construction of Buildings 1A and 1B.

¹²³ Arborwell Professional Tree Management, *Jewish Home for the Aged, San Francisco, California, Inventory and Pre-Construction Tree Protection Plan*, March 7, 2012. Available for review at the Planning Department, 1650 Mission Street, Suite 400, in Case File No. 2011.1323E.

¹²⁴ San Francisco Planning Department. *Affidavit for Tree Disclosure*, completed by Daniel R. Ruth, 302 Silver Avenue, March 20, 2012. Available for review at the Planning Department, 1650 Mission Street, Suite 400, in Case File No. 2011.1323E.

- There are no landmark trees on the Jewish Home campus or adjacent right-of-way.¹²⁵
- There are 29 street trees on the right-of-ways adjacent to the Jewish Home campus.¹²⁶

Approximately 82 on-site trees would be removed under the proposed project, including some of the large cypress trees near the corner of Mission Street and Avalon Avenue. Of the 82 trees to be removed there are 41 under 12" in diameter, 17 of 12" to 18" diameter, 5 of 20" to 36" diameter, and 19 multi-stem. It is estimated that three of the large cypress trees in this location would be retained. The proposed project would also be required to include the planting of street trees in accordance with *Planning Code* Section 138.1 requirements, or would meet the requirement through payment of an in-lieu fee. The project would include installation of new landscaping along the Avalon Avenue frontage, between the new buildings and the street, as well as along the new Avalon Avenue driveway. (Building 1B would be constructed to the property line along Mission Street, consistent with City guidelines and to provide access from the sidewalk to the new retail space.) Additional landscaping would occur within the interior of the project site, in much of the area currently occupied by the existing central pavilion of the Main Building. Portions of the project site's Mission Street frontage would be improved in a manner generally consistent with the City's Better Streets Plan, including some combination of wider sidewalks, bulbouts, street trees, and potentially a small plaza. Therefore, the project would not conflict with the City's local tree ordinance. Thus, this impact would be *less than significant*.

Mitigation: None required.

Impact C-BI-1: The proposed project in combination with other past, present or reasonably foreseeable projects, would not result in a considerable contribution to cumulative impacts on biological resources. (Less than Significant)

The geographic scope for potential cumulative biological resources impacts encompasses land uses in the vicinity of the Jewish Home. The area generally includes the Excelsior and Outer Mission neighborhoods. Similar to the project area, the project vicinity does not include riparian habitat or other sensitive natural communities and with the exception of trees (primarily street trees) and landscaped areas, the area does not support or provide habitat for any known rare or endangered species and project development would not interfere with any resident or migratory species.

Like the proposed project, cumulative projects in the area would also be required to comply with the federal Endangered Species Act, *California Fish and Game Codes* and the MBTA which protect special-status bird species and the Standards for Bird-Safe Buildings. Projects would be subject to *DPW Code* Section 8.02-8.11, as well as *Planning Code* Section 138.1 regarding planting of street trees. Adherence to these requirements would reduce the potential for combined effects on biological resources.

¹²⁵ San Francisco Department of Public Works, Significant and Landmark Trees, web page: <http://www.sfdpw.org/index.aspx?page=663>, accessed June 13, 2014.

¹²⁶ San Francisco Planning Department. *Affidavit for Tree Disclosure*, completed by Daniel R. Ruth, 302 Silver Avenue, March 20, 2012. Available for review at the Planning Department, 1650 Mission Street, Suite 400, in Case File No. 2011.1323E.

The project would include the removal of trees on the project site, as well as installation of new landscaping. It would not considerably contribute to potential cumulative impacts on biological resources.

In summary, as noted above, the project would not have significant impacts on special status species, avian species, riparian, wetland, or sensitive natural communities and would not conflict with an approved local, regional, or state habitat conservation plan or tree protection ordinance. Therefore, the proposed project's contribution to cumulative impacts to biological resources would not be cumulatively considerable, and this impact would be *less than significant*.

Mitigation: None required.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
13. GEOLOGY AND SOILS— Would the project:					
a) Expose people or structures to 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 off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	☐	☒	☐	☐
d) Be located on expansive soil, as defined in the <i>California Building Code</i> , creating substantial 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) Change substantially the topography or any unique geologic or physical features of the site?	☐	☐	☐	☒	☐

The proposed project would connect to the combined sewer system which is the wastewater conveyance system for San Francisco, and would not use septic tanks or other on-site land disposal systems for sanitary sewage. Therefore, initial study Topic E.13(e), pertaining to alternative wastewater disposal, is not applicable.

The project site elevation slopes up from approximately 152 feet San Francisco City Datum (SFD)¹²⁷ at the corner of Silver Avenue and Mission Street to 185 feet SFCD along Avalon Avenue, with no unique topographic, geologic, or physical features.¹²⁸ The proposed project would not substantially alter the topography of the site. Therefore, there is *no impact* related to the potential of the project to substantially alter unique geographic features discussed in initial study Topic E.13(f).

Evaluation of geology and soils impacts is based on a preliminary geotechnical report prepared for the project and on previous geotechnical investigations at the site and in the vicinity, as well as published geologic maps.¹²⁹ Potential seismic impacts related to the project include seismically induced groundshaking, as well as liquefaction and related ground failures that could damage below-grade structures at the project site. Construction-related impacts include potential erosion, excavation instability, and settlement from excavation dewatering. The final features to be included in the project to avoid or withstand seismic and geologic effects would be determined on the basis of a design-level geotechnical investigation required as part of the building permit process administered by the San Francisco Department of Building Inspection (DBI), as discussed below.

Available information indicates the following subsurface conditions beneath the project site:

- **Undocumented fill**, comprising loose- to medium-dense sand and sand with silt, underlies much of the project site ranging from 2 to 20 feet deep, generally thicker moving from north to south.
- This fill is underlain by the **Colma Formation**, which comprises up to 35 feet of medium to very dense sand with silt and silty clay.
- The Colma Formation is underlain by the **Franciscan Formation**, which comprises moderately to deeply weathered sandstone and siltstone bedrock. The top of bedrock is between elevation 125 and 150 feet in the area of proposed development.¹³⁰

The depth to groundwater at the project site is on the order of 19 to 28 feet below ground surface, corresponding to an elevation of 145 to 135 feet SFD. Where shallow bedrock is present, the groundwater

¹²⁷ San Francisco City Datum (SFD) establishes the City's zero point for surveying purposes at approximately 8.6 feet above the mean sea level established by 1929 U.S. Geological Survey datum, and approximately 11.3 feet above the current 1988 North American Vertical Datum. Because tides are measured from mean lower low water, which is about 3.1 feet below mean sea level (MSL), an elevation of 0, SFD, is approximately 8.2 feet above MSL.

¹²⁸ Treadwell & Rollo, *Preliminary Geotechnical Evaluation: Jewish Home of San Francisco, 301 Silver Avenue, San Francisco, California*, February 15, 2012. Available for review at the Planning Department, 1650 Mission Street, Suite 400, in Case File No. 2011.1323E.

¹²⁹ *Ibid.*

¹³⁰ *Ibid.*

level may be higher. The groundwater level likely varies seasonally, and it has been encountered as high as 12 feet below ground surface in previous investigations.¹³¹

Impact GE-1: The proposed project would not expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, seismic groundshaking, seismically induced ground failure, or landslides. (Less than Significant)

Fault Rupture. The project site is not located within an Alquist-Priolo Earthquake Fault Zone, and no active or potentially active faults exist on or in the immediate vicinity of the site. Therefore, the potential for surface fault rupture is low, and this impact would be *less than significant*.

Groundshaking. The intensity of seismic shaking, or strong ground motion, at the project site during an earthquake is dependent on the distance between the site and the epicenter of the earthquake, the magnitude of the earthquake, and the geologic conditions underlying and surrounding the site. Earthquakes occurring on faults closest to the site would most likely generate the largest ground motions. The intensity of earthquake-induced ground motions can be described in terms of “peak ground acceleration,” which is represented as a fraction of the acceleration of gravity (g).¹³²

The U.S. Geological Survey (USGS) concluded that there is a 63 percent probability of a strong earthquake (Mw 6.7¹³³ or higher) occurring in the San Francisco Bay region in the 30-year period between 2007 and 2036.¹³⁴ The faults that would be capable of causing strong groundshaking at the project site are the San Andreas Fault, located within 7 miles; the Hayward fault, located within 22 miles; the San Gregorio fault, located within 14 miles; and the Calaveras, Mt. Diablo and Rodgers Creek faults, located 22 or more miles away.¹³⁵ Based on shaking hazard mapping by ABAG, the project site would experience very strong ground shaking due to an earthquake along the peninsula segment of the San Andreas Fault or the northern and southern Hayward fault, which are the faults closest to the project site.¹³⁶ The California Geological Survey estimates that peak ground accelerations in the project site vicinity would range from approximately 0.53 to 0.70g.¹³⁷ Although the project site would be subject to very strong ground shaking in the event of a major earthquake, the project would not expose people or structures to substantial adverse effects related to ground shaking because the project would be designed and constructed in accordance with the most current *San Francisco Building Code*, which incorporates *California Building Code*

¹³¹ *Ibid.*

¹³² Acceleration of gravity (g) = 980 centimeters per second squared. 1.0 g of acceleration is a rate of increase in speed equivalent to a car traveling 328 feet from rest in 4.5 seconds.

¹³³ An earthquake is classified by the amount of energy released, expressed as the magnitude of the earthquake. Traditionally, magnitudes have been quantified using the Richter scale. However, seismologists now use a moment magnitude (Mw) scale because it provides a more accurate measurement of the size of major and great earthquakes. Moment magnitude is directly related to the average slip and fault rupture area.

¹³⁴ U.S. Geologic Survey (USGS), The Uniform California Earthquake Rupture Forecast, Version 2 (UCERF 2), by the Working Group on California Earthquake Probabilities, Open File Report 2007-1437, 2008.

¹³⁵ Distance obtained from Geotechnical Consultants, Inc. Phase I Preliminary Geotechnical Report, Moscone Center Expansion, San Francisco, California. April 2013. Available for review at the Planning Department, 1650 Mission Street, Suite 400, in Case File No. 2013.0154E.

¹³⁶ Association of Bay Area Governments, Hazard Maps, Shaking Maps, 2003, www.abag.ca.gov, accessed May 5, 2013.

¹³⁷ California Department of Conservation, Division of Mines and Geology, Seismic Hazard Zone Report 043, Seismic Hazard Zone Report for the City and County of San Francisco, California, 2000.

requirements. The *California Building Code*, which specifies definitions of seismic sources and the procedure used to calculate seismic forces on structures during groundshaking. The preliminary geotechnical report estimates that when site specific conditions are considered, the peak ground acceleration would be about 0.44g.¹³⁸ However, the design level geotechnical investigation will refine this estimate at a level suitable for project design in accordance with the *San Francisco Building Code*.

Incorporation of appropriate engineering and design features in accordance with the *San Francisco Building Code*, subject to review by the DBI as part of the building permit approval process, would ensure that the new structures would not suffer substantial damage, that substantial debris such as building exterior finishes or windows would not separate from the buildings, that building occupants would be able to safely vacate the building following an earthquake, and that pedestrians and other bystanders would not be injured. While some damage could occur, building occupants could reoccupy the buildings after an earthquake with the completion of any necessary repairs. Therefore, impacts related to ground shaking would be *less than significant*.

Liquefaction, Lateral Spreading, and Earthquake-Induced Settlement. Liquefaction is a phenomenon in which saturated granular sediments temporarily lose their shear strength during periods of earthquake-induced, strong groundshaking. The susceptibility of a site to liquefaction is a function of the depth, density, and water content of the granular sediments and the magnitude of earthquakes likely to affect the site. Saturated, unconsolidated silts, sands, silty sands, and gravels within 50 feet of the ground surface are most susceptible to liquefaction. The primary liquefaction-related phenomena include vertical settlement¹³⁹ and lateral spreading.¹⁴⁰

The project site is not located in an area of liquefaction potential identified by the California Department of Conservation under the Seismic Hazards Mapping Act of 1990.¹⁴¹ Isolated, potentially liquefiable soils of approximately 5 feet in depth were encountered at the site, and therefore be subject to both liquefaction and earthquake-induced. However, the foundations of the proposed structures would not be subjected to liquefaction damage because they would be supported on a shallow grade beam system above the underlying Colma Formation (dense sand), which has a low liquefaction potential.¹⁴² The potential for lateral spreading is low because the potentially liquefiable soil at the site is isolated and discontinuous.¹⁴³

¹³⁸ Treadwell & Rollo, *Preliminary Geotechnical Evaluation: Jewish Home of San Francisco, 301 Silver Avenue, San Francisco, California*, February 15, 2012. Available for review at the Planning Department, 1650 Mission Street, Suite 400, in Case File No. 2011.1323E.

¹³⁹ During an earthquake, settlement can occur as a result of the relatively rapid rearrangement, compaction, and settling of subsurface materials (particularly loose, non-compacted, and variable sandy sediments). Settlement can occur both uniformly and differentially (i.e., where adjoining areas settle at different rates). Areas are susceptible to differential settlement if underlain by compressible sediments, such as poorly engineered artificial fill or bay mud.

¹⁴⁰ Of the liquefaction hazards, lateral spreading generally causes the most damage. This is a phenomenon in which large blocks of intact, non-liquefied soil move downslope on a liquefied substrate that covers a large area.

¹⁴¹ California Department of Conservation, Division of Mines and Geology, State of California Seismic Hazard Zones, City and County of San Francisco, Official Map, November 17, 2000.

¹⁴² Rollo and Ridley, personal communication to Pacific Union Development Company, RE: geotech info Jewish Home, January 23, 2015.

¹⁴³ Treadwell & Rollo, *Preliminary Geotechnical Evaluation: Jewish Home of San Francisco, 301 Silver Avenue, San Francisco, California*, February 15, 2012. Available for review at the Planning Department, 1650 Mission Street, Suite 400, in Case File No. 2011.1323E.

The building plans would be submitted as part of the building permit application and reviewed by DBI to ensure compliance with all *San Francisco Building Code* provisions regarding structural safety. Therefore, impacts related to liquefaction, earthquake-induced settlement, and lateral spreading would be *less than significant*.

Earthquake-Induced Landslides. Most hillside sites throughout the San Francisco Bay Area are at some risk of ground displacement (i.e., landslides) during an earthquake. The project site does not include any areas of mapped earthquake-induced landslide susceptibility identified by the California Department of Conservation under the Seismic Hazards Mapping Act of 1990 and is not at a hillside location.¹⁴⁴ Therefore, the potential for landslides to occur at the project site is low and the impact would be *less than significant*.

Mitigation: None required.

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

Soil movement for foundation excavation and other improvements could create the potential for wind- and water-borne soil erosion. Loose surface soils would generally be removed and reused on site as engineered fill. Some areas would receive more grading and earthwork activities than others with a maximum depth of 30 feet of excavation.¹⁴⁵ Open space areas may require minor grading, and topsoils would be segregated and returned to their point of origin, where possible. Disturbance of site soils would be temporary during construction, and the project sponsor would be required to adhere to the requirements of the General Construction Permit under the National Pollutant Discharge Elimination System (NPDES) program. The NPDES permit requires implementation of a Stormwater Pollution Prevention Plan, which contains best management practices that are designed to reduce potential erosion impacts during construction.

The project sponsor would be required to implement an erosion and sediment control plan during construction activities in accordance with Article 4.1 of the *San Francisco Public Works Code* (discussed in Topic 14, "Hydrology and Water Quality") to reduce the impact of runoff from the construction site. The SFPUC must review and approve the erosion and sediment control plan prior to implementation, and would conduct periodic inspections to ensure compliance with the plan. Therefore, impacts related to soil erosion would be *less than significant*.

The proposed project would include vegetating exposed ground surface as well as drainage control requirements during operation that would control stormwater runoff at the site. Thus, the project would not result in a loss of topsoil, nor result in substantial soil erosion on the project site or surrounding properties. Therefore, impacts of the proposed project related to loss of top soil would be *less than significant*.

¹⁴⁴ California Department of Conservation, Division of Mines and Geology, State of California Seismic Hazard Zones, City and County of San Francisco, Official Map, November 17, 2000.

¹⁴⁵ Treadwell & Rollo, *Preliminary Geotechnical Evaluation: Jewish Home of San Francisco, 301 Silver Avenue, San Francisco, California*, February 15, 2012. Available for review at the Planning Department, 1650 Mission Street, Suite 400, in Case File No. 2011.1323E.

Mitigation: None required.

Impact GE-3: The project site is not located on a geologic unit or soil that is unstable, or that could become unstable as a result of the project. (Less than Significant)

Ground settlement could result from excavation for construction of buildings and from construction dewatering.

Excavation

Construction of the proposed buildings would require excavation to a depth of up to 30 feet below ground surface, which may require temporary shoring. Where excavation depths exceed 12 feet, tiebacks or internal bracing may be required. Underpinnings would be required if the excavation would be deeper than the zone of influence of adjacent buildings. Recommendations for temporary shoring and underpinnings would be provided in the site-specific, design-level geotechnical report pursuant to the State Seismic Hazards Mapping Act.¹⁴⁶

Construction-Related Dewatering

The 30-foot excavation depth would extend approximately 10 to 20 feet below the anticipated groundwater levels. Therefore, there is the potential for substantial water inflow into the excavated areas during construction. Without an adequate groundwater control program, groundwater could also intrude into the existing buildings where the existing mat foundation or waterproofing systems would be penetrated to install features such as foundations and tiedown anchors. Dewatering would be required to maintain the groundwater level beneath the depth of excavation and could potentially result in settlement of adjacent structures, including buildings, sidewalks, streets, and utilities. To prevent adverse settlement during construction, a site-specific dewatering plan could be necessary.

DBI Requirements

DBI would review the detailed geotechnical report to ensure that the potential settlement and subsidence impacts of excavation and dewatering are appropriately addressed in accordance with Section 1704.15 of the *San Francisco Building Code*. DBI would also require that the report include a determination as to whether a lateral movement and settlement survey should be done to monitor any movement or settlement of surrounding buildings and adjacent streets during construction. If a monitoring survey were recommended, DBI would require that a Special Inspector be retained by the project sponsor to perform this monitoring. Groundwater observation wells could be required to monitor potential settlement and subsidence during dewatering. If, in the judgment of the Special Inspector, unacceptable movement were to occur during construction, corrective actions would be used to halt this settlement. Groundwater recharge could be used to halt settlement due to dewatering. Further, the final building plans would be reviewed by DBI, which would determine if additional site-specific reports would be required.

¹⁴⁶ *Ibid.*

With implementation of the recommendations provided in the detailed geotechnical study, subject to review and approval by DBI, and monitoring by a DBI Special Inspector (if required), impacts related to the potential for settlement and subsidence due to construction on soil that is unstable, or could become unstable as a result of the project, would be *less than significant*.

Mitigation: None required.

Impact GE-4: The proposed project would not create substantial risks to life or property as a result of being located on expansive soil. (Less than Significant)

Typically, soils that exhibit expansive characteristics are found within the upper 5 feet of ground surface. Over long-term exposure to wetting and drying cycles, expansive soils can experience volumetric changes. The effects of expansive soils could damage foundations of above-ground structures, paved roads and streets, and concrete slabs. Expansion and contraction of soils, depending on the season and the amount of surface water infiltration, could exert enough pressure on structures to result in cracking, settlement, and uplift. The final design geotechnical investigation would also include evaluating the potential for expansive soils and minimizing any adverse effects through site preparations such as placement of engineered fill in accordance with the *California Building Standards Code* and DBI review. Incorporation of these building code requirements would reduce the potential impact to *less than significant*.

Mitigation: None required.

Impact C-GE-1: The proposed project, in combination with other past, present, and reasonably foreseeable future projects, would not result in a considerable contribution to cumulative impacts related to geologic hazards. (Less than Significant)

Geologic impacts are usually restricted to the immediate vicinity and geologic impacts resulting from the proposed project are limited to seismic effects and the potential for creation of an unstable geologic unit. Seismic events could occur in the project vicinity, including the Excelsior and Outer Mission neighborhoods. Therefore, these areas are considered the geographic scope for seismic effects. The creation of unstable geologic units is a local effect; therefore, the geographic scope for this cumulative impact is the project area and immediate vicinity.

Seismic Safety. There are no cumulative projects in the vicinity that would expose substantial amounts of people to seismic risks. As noted in Impact GE-1, the project site is not subject to fault rupture because there are no known earthquake faults that cross the site or vicinity. Any development within the project area would be subject to very strong groundshaking and could experience liquefaction effects in the event of an earthquake on a nearby fault; therefore, the potential exists for combined seismic effects. However, the project's new buildings would be constructed in accordance with the most current building code requirements for seismic safety, providing for increased life-safety protection of residents and workers. These requirements would reduce potential cumulative impacts to a *less-than-significant* level, and the proposed project's compliance with these requirements would ensure that it would not make a cumulatively considerable contribution to cumulative impacts related to seismic safety.

Unstable Geologic Unit. As discussed in Impact GE-3, implementation of the proposed project could result in ground settlement from excavation for construction or from construction dewatering. It is unlikely that nearby projects could contribute to cumulative impacts related to an unstable geologic units because nearby projects would not require excavation to such depths. These projects would be required to implement DBI procedures similar to those described above, including preparation of a detailed geotechnical report and site-specific reports as needed to address the potential settlement and subsidence impacts of excavation and dewatering; implementation of a lateral movement and settlement survey to monitor any movement or settlement of surrounding buildings and adjacent streets during construction and monitoring by a Special Inspector, if needed; and implementation of corrective actions, as necessary. With implementation of these requirements, cumulative impacts related to ground settlement would be *less than significant*.

Mitigation: None required.

<u>Topics:</u>	<u>Potentially Significant Impact</u>	<u>Less Than Significant with Mitigation Incorporated</u>	<u>Less Than Significant Impact</u>	<u>No Impact</u>	<u>Not Applicable</u>
14. HYDROLOGY AND WATER QUALITY— Would the project:					
a) Violate any water quality standards or waste discharge requirements?	☐	☐	☒	☐	☐
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	☐	☐	☒	☐	☐
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner that would result in substantial erosion of siltation on- or off-site?	☐	☐	☒	☐	☐
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site?	☐	☐	☒	☐	☐
e) 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?	☐	☐	☒	☐	☐
f) Otherwise substantially degrade water quality?	☐	☐	☒	☐	☐
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other authoritative flood hazard delineation map?	☐	☐	☐	☐	☒

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
14. HYDROLOGY AND WATER QUALITY (continued)					
h) Place within a 100-year flood hazard area structures that would impede or redirect flood flows?	☐	☐	☐	☐	☒
i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	☐	☐	☒	☐	☐
j) Expose people or structures to a significant risk of loss, injury or death involving inundation by seiche, tsunami, or mudflow?	☐	☐	☐	☒	☐

The project site is not located within an area of sewer-related flooding identified by the SFPUC;¹⁴⁷ within a Special Flood Hazard Area identified on San Francisco's Interim Floodplain Map;¹⁴⁸ or an area that would be inundated with a sea level rise of 55 inches by 2100 based on mapping by the Pacific Institute.¹⁴⁹ Therefore, initial study Topics E.14(g) and E.14(h) are not applicable.

The project site is not located in an area subject to reservoir inundation hazards¹⁵⁰ and is not located on or near a slope that could be subject to mudflow. Based on the state's official tsunami inundation maps, the project site is not located within a tsunami inundation zone.¹⁵¹ Therefore, there is *no impact* related to initial study Topic E.14(j).

Impact HY-1: The proposed project would not violate water quality standards, contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems, provide substantial additional sources of polluted runoff, or otherwise substantially degrade water quality. (Less than Significant)

Construction-Related Stormwater and Groundwater Discharges

Over the construction period, there would be a potential for erosion and transportation of soil particles during site preparation, excavation, dewatering, foundation pouring, and construction activities. Once in surface water runoff, sediment and other pollutants could leave the construction site and ultimately be released into the San Francisco Bay. Stormwater runoff from project construction would drain into the combined sewer and stormwater system and be treated at the Southeast Water Pollution Control Plant (SEWPCP) prior to discharge into San Francisco Bay. Pursuant to the *San Francisco Public Works Code*, including the Construction Site Runoff Control Ordinance, and the *San Francisco Green Building Code*, the

¹⁴⁷ San Francisco Planning Department, Planning Director Bulletin No. 4, Review of Project Identified in Areas Prone to Flooding.

¹⁴⁸ City and County of San Francisco, San Francisco Interim Floodplain Map, Northeast. Final Draft July, 2008.

¹⁴⁹ Pacific Institute, California Flood Risk: Sea Level Rise, San Francisco North Quadrangle, 2009.

¹⁵⁰ URS Corporation, City and County of San Francisco Hazard Mitigation Plan, December, 2008. Map C-14.

¹⁵¹ California Emergency Management Agency, California Geological Survey, University of Southern California. Tsunami Inundation Map for Emergency Planning, San Francisco North Quadrangle/San Francisco South Quadrangle (SF Bay). June 15, 2009.

project sponsor would be required to implement an Erosion and Sediment Control Plan that sets forth BMP measures to reduce potential runoff and erosion impacts.

The application for the permit must also include an Erosion and Sediment Control Plan that provides a vicinity map showing the location of the site in relationship to the surrounding area's water courses, water bodies, and other geographic features; a site survey; suitable contours for the existing and proposed topography, area drainage, proposed construction and sequencing, proposed drainage channels; proposed erosion and sediment controls; dewatering controls where applicable; soil stabilization measures where applicable; maintenance controls; sampling, monitoring, and reporting schedules; and any other information deemed necessary by the SFPUC. A building permit cannot be issued until a Construction Site Runoff Control Permit has been issued.

Under the Construction Site Runoff Control Permit, the project sponsor would be required to conduct daily inspections and maintenance of all erosion and sediment controls and must provide inspection and maintenance information to the SFPUC. The SFPUC would also conduct periodic inspections of the project site to ensure compliance with the plan. The project sponsor would be required to notify the SFPUC at least two days prior to the start of construction, completed installation of erosion and sediment control measures, completion of final grading, and project completion. At the SFPUC's discretion, sampling, metering, and monitoring may also be required. Implementation of the Erosion and Sediment Control Plan would ensure that water quality impacts related to violation of water quality standards or degradation of water quality due to discharge of construction-related stormwater runoff would be *less than significant*.

Combined Sewer Overflows During Operation

The proposed project is located in the Eastern Basin of the City's combined sewer system, within the Islais Creek sub-basin. As described in Topic 10, "Utilities and Service Systems," the proposed project would increase wastewater generation at the site. The project-related increase in wastewater generation would be approximately 32,490 gpd, or 11.9 million gallons annually.

During dry weather (typically, early May to mid-October), all wastewater generated from the proposed project would be treated at the Southeast Plant, which currently operates at about 75 percent of its dry-weather design flow capacity of 84.5 million gallons per day.¹⁵² The increased discharge represents less than 0.15 percent (15 hundredths of 1 percent) of the remaining treatment capacity. Therefore, the additional dry weather flow under the proposed project would be accommodated within the system's existing capacity.

During wet weather (typically, mid-October to late April), there is a variation in volume of wet weather flow due to the addition of stormwater and the increased flows can exceed the 400-million-gpd treatment capacity of the eastside wet weather facilities. The volume of wet weather flows is directly related to the rainfall intensity, and treatment of the wet weather flows varies depending on the characteristics of any

¹⁵² California Regional Water Quality Control Board, San Francisco Bay Region, Order No. R2-2008-0007, NPDES No. CA0037, http://www.waterboards.ca.gov/sanfranciscobay/board_decisions/adopted_orders/2008/R2-2008-0007.pdf, accessed December 3, 2014.

individual rainstorm. Flows in excess of the treatment capacity are conveyed to storage and transport boxes that provide “flow-through treatment” to remove settleable solids and floatable materials, which is similar to primary treatment. The excess flows are then eventually discharged through 29 combined sewer discharge structures located along the City’s bayside waterfront from the Marina Green to Candlestick Point. Wet weather flows are intermittent throughout the rainy season, and combined sewer overflow events vary in nature and duration depending largely on the intensity of individual rainstorms. All discharges from the combined sewer system to the Bay, through either the primary outfalls or the combined sewer discharge structures, are operated in compliance with the federal Clean Water Act and the State’s Porter-Cologne Water Quality Control Act through permits issued by the California Regional Water Quality Control Board, San Francisco Bay Region (RWQCB).

Except during severe rain events, the increased wastewater flows would be treated at the Southeast Plant and North Point Wet Weather facility, and would not substantially contribute to combined sewer discharges. The SFPUC is developing a Sewer System Improvement Program that would include measures by the City to reduce the quantity and frequency of overflows and improve the water quality of overflows.

Changes in Stormwater Runoff. Stormwater runoff in an urban location, such as the project site, is a known source of pollution. Runoff from the site may contain polynuclear aromatic hydrocarbons¹⁵³ (PAHs) from vehicle emissions; heavy metals, such as copper from brake pad wear and zinc from tire wear; dioxins as products of combustion; and mercury resulting from atmospheric deposition. All of these materials, and others, may be deposited on paved surfaces and rooftops as fine airborne particles, thus yielding stormwater runoff pollution that is unrelated to use of the facility. In addition, during operations the project could contribute specific pollutants including sediments, nutrients, oil and grease, organics, and trash that can be washed into the combined sewer system. These pollutants can all affect water quality.

The proposed project would entail construction of all improvements according to the San Francisco Stormwater Management Ordinance, which requires treatment of all runoff prior to leaving the site. The proposed stormwater management system for the project would collect, detain and potentially retain some stormwater within the project site such that the rate and amount of stormwater runoff from the site does not negatively impact the City’s treatment facilities, and in a manner that is consistent with the SFPUC’s Stormwater Design Guidelines.

Accordingly, the project sponsor would be required to incorporate low-impact design (LID) techniques into the design and to implement stormwater BMPs to reduce the flow rate and volume of stormwater entering the combined sewer system, which would also reduce the amount of stormwater pollutants that would otherwise be discharged to the combined sewer system. Peak stormwater discharge rates would also be reduced, which would lessen the effects on combined sewer discharges.

¹⁵³ Polynuclear aromatic hydrocarbons (PAHs) are group of chemicals that are formed during the incomplete burning of coal, oil, gas, wood, garbage, or other organic substances, such as tobacco and charbroiled meat. PAHs usually occur naturally, but they can be manufactured. A few PAHs are used in medicines and to make dyes, plastics, and pesticides. Others are contained in asphalt used in road construction. They can also be found in substances such as crude oil, coal, coal tar pitch, creosote, and roofing tar. They are found throughout the environment in the air, water, and soil. They can occur in the air, as vapors or attached to dust or ash particles, or as solids in soil or sediment.

The Stormwater Control Plan for the project would describe the rainwater collection system and any other BMPs that would be implemented to achieve the specified reduction in stormwater flows as well as a plan for post-construction operation and maintenance of the BMPs. Specifically, the plan would include the following elements:

- Site characterization
- Design and development goals
- Site plan
- Site design
- Source controls
- Treatment BMPs
- Comparison of design to established goals
- Operations and maintenance plan

The Stormwater Control Plan must be reviewed and stamped by a licensed landscape architect, architect, or engineer. The SFPUC would review the plan and certify compliance with the Stormwater Design Guidelines, and would inspect stormwater BMPs once they are constructed. Any issues noted by the inspection must be corrected before the Certificate of Occupancy can be issued for the building. Following occupancy, the owner would be responsible for completing an annual self-certification inspection, and must submit completed checklists and maintenance logs for the year to the SFPUC. In addition, the SFPUC would inspect all stormwater BMPs every third year and any issues identified by either inspection must be resolved before the SFPUC could renew the certificate of compliance.

Therefore, there would not likely be a substantial effect on the frequency or duration of combined sewer discharges. Implementation of the proposed project would result in *less-than-significant* water quality impacts related to violation of water quality standards or degradation of water quality associated with changes in combined sewer discharges into the Bay.

Exceedance of Storm System Capacity and Additional Sources of Polluted Runoff

As discussed above, in accordance with the San Francisco's Stormwater Ordinance and the Stormwater Design Guidelines, the peak rate and volume of stormwater discharged from the site would be reduced by 25 percent relative to existing conditions. Therefore, the project would not contribute runoff water which would exceed the capacity of an existing or planned stormwater drainage system or provide substantial additional sources of polluted runoff, and impacts related to these topics would be *less than significant*.

Mitigation: None required.

Impact HY-2: The proposed project would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level. (Less than Significant)

The proposed project would use potable water from the SFPUC. Groundwater is not used as drinking water at the project site. The project site is currently partially covered with impervious surfaces and natural groundwater flow continues under and around the site. Construction of the proposed project may increase impervious surface coverage on the site; however, as stated above, the project would include features that would limit offsite runoff rate and volume to be in accordance with Stormwater Design Guidelines. Implementation of the stormwater management system would include measures that allow

infiltration of groundwater. Therefore, the proposed project would not substantially alter existing groundwater or surface flow conditions, and impacts related to the depletion of groundwater resources and interference with groundwater recharge would be *less than significant*.

Mitigation: None required.

Impact HY-3: The proposed project would not alter the existing drainage pattern of the area in a manner that would result in substantial erosion, siltation, or flooding on- or off-site. (Less than Significant)

The project site does not include any existing streams or water course that could be altered or diverted, and there are no surface impoundments, wetlands, natural catch basins, or settling ponds within the project site. Therefore, there would be no impact related to alteration of drainage patterns by altering the course of a stream in a manner that would cause erosion or flooding on or off-site.

Currently, surface water runoff from the project site is conveyed to the combined sewer system. As discussed in Impact HY-1, the project would capture rainwater and reuse it on-site to comply with stormwater flow reductions required by San Francisco's Stormwater Design Guidelines. Compliance with the Stormwater Design Guidelines would reduce the quantity and rate of stormwater runoff to the City's combined sewer system, decreasing the potential for erosion and flooding, and would result in a *less-than-significant* impact.

Mitigation: None required.

Impact C-HY-1: The proposed project, in combination with past, present, and reasonably foreseeable future projects in the site vicinity, would not result in a considerable contribution to cumulative impacts on hydrology and water quality. (Less than Significant)

Impacts resulting from the proposed project are limited to potential water quality impacts on the Eastern Drainage Basin of the combined sewer system and central San Francisco Bay. Therefore, the geographic scope of potential cumulative impacts on water quality encompasses the Eastern Drainage Basin of the combined sewer system and central San Francisco Bay.

Water Quality Standards, Degradation of Water Quality, and Storm Sewer Capacity

Erosion and Use of Hazardous Materials During Construction and Groundwater Dewatering Discharges.

As described in Impact HY-1, construction activities associated with the proposed project could degrade water quality as a result of increased soil erosion and associated sedimentation as well as an accidental release of hazardous materials. Discharges of dewatering effluent from excavated areas could also adversely affect water quality. However, these discharges would flow into San Francisco's combined sewer system and would be subject to the requirements of Article 4.1 of the *San Francisco Public Works Code* (supplemented by SFDPW Order No. 158170), which incorporates and implements the SFPUC's NPDES permit and the federal CSO Control Policy for discharges from the combined sewer system. The cumulative projects within the vicinity and throughout San Francisco that would also include discharges to the combined sewer system

would be subject to the same regulatory requirements, and adherence to the SFPUC's NPDES permit stipulations would ensure compliance with water quality objectives. Therefore, the potential for project effects to combine is low. Cumulative impacts related to degradation of water quality would be *less than significant*.

Combined Sewer Overflows During Operation and Storm Sewer Capacity. As discussed in Impact HY-1, implementation of the proposed project would be expected to result in a 10.5 million gallons per year net increase in wastewater flows to the combined sewer system. The stormwater runoff peak rate and total discharge volume would also be reduced by implementation of stormwater control measures. Other development projects in the City would also be required to minimize wastewater flows and reduce stormwater flows in accordance with the same regulatory requirements. The net effect of these projects on combined sewer discharges would depend on the relative volume of wastewater increases and stormwater decreases; combined effects could occur. However, the project would not have a cumulatively considerable contribution to any increase in combined sewer discharges. Therefore, the project's contribution to combined sewer overflows and sewer capacity would not be cumulatively considerable and this impact would be *less than significant*. Similarly, the proposed project and all of the cumulative projects would be required to decrease the peak rate and total stormwater flow to the combined sewer system in accordance with the City's Stormwater Design Guidelines, and cumulative impacts related to exceedance of storm sewer capacity and additional sources of stormwater pollutants would be *less than significant*.

Depletion of Groundwater Resources

As discussed in Impact HY-2, the project would not result in the depletion of groundwater resources because groundwater beneath the site is not used as a potable water supply, and there are no plans for development of this basin for groundwater production. Therefore, there is no potential for cumulative impacts to groundwater resources. Also, the proposed project's contribution to cumulative impacts related to groundwater depletion would not be cumulatively considerable. This impact would be *less than significant*.

Mitigation: None required.

<u>Topics:</u>	<u>Potentially Significant Impact</u>	<u>Less Than Significant with Mitigation Incorporated</u>	<u>Less Than Significant Impact</u>	<u>No Impact</u>	<u>Not Applicable</u>
15. 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?	☐	☐	☒	☐	☐

Topics:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Not Applicable
15. HAZARDS AND HAZARDOUS MATERIALS (continued)					
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to <i>Government Code</i> 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 for people residing or working in the project area?	☐	☐	☐	☐	☒
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☐	☒
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐	☐
h) Expose people or structures to a significant risk of loss, injury or death involving fires?	☐	☐	☒	☐	☐

The project site is not located within an airport land use plan area or in the vicinity of a private airstrip. Therefore, initial study Topics E.15(e) and E.15(f) are not applicable.

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

Operation and maintenance of the existing Jewish Home facilities involves the use of common types of hazardous materials, such as cleaners, disinfectants, and chemical agents required to maintain the sanitation of bathrooms and food preparation areas. In addition, pharmaceutical prescriptions are administered to residents. These products are labeled to inform users of potential risks and to instruct them in appropriate handling procedures. Various chemicals, including grease, oils, diesel, coolants, paints, thinners, sealants, adhesives, resins, refrigerants, and batteries are also used for building operation and maintenance. There have been no documented spills or releases associated with generation of these wastes.¹⁵⁴

The expanded facilities (including the new buildings, as well as The Square uses proposed to be located in the Rosenberg building) would include the use of the same types of common hazardous materials and generate the same types of hazardous wastes, but somewhat greater amounts would be required. These waste disposal practices for these chemicals would be expected to continue following completion of the proposed project. Expired pharmaceutical waste would continue to be disposed of periodically in accordance with the federal Resource Conservation and Recovery Act Small Quantity Generator Requirements.¹⁵⁵

¹⁵⁴ Treadwell & Rollo, *Phase I Environmental Site Assessment: 302 Silver Avenue, San Francisco, California*, March 2012.

¹⁵⁵ *Ibid.*

To ensure the safe handling of these materials, the project sponsor would continue to comply with the requirements of the City's hazardous materials handling requirements specified in Article 21 of the *San Francisco Health Code*. In accordance with this article, the facility's Certificate of Registration and Hazardous Materials Business Plan on file with the San Francisco Department of Public Health (SFDPH) would be revised to reflect the increased quantities of hazardous materials used. The Hazardous Materials Business Plan includes chemical inventories, a program for reducing the use of hazardous materials and generation of hazardous wastes, site layouts, a program and implementation plan for training all new employees and volunteers (and annual training for all employees and volunteers), and emergency response procedures and plans which provides for safe handling of hazardous materials, and also allows emergency responders to safely respond to a chemical emergency at the facility, if one were to occur. Vendors would also be required to submit a Certificate of Registration at a minimum if they use hazardous materials above threshold quantities specified in Article 21 (500 pounds, 55 gallons, or 200 cubic feet for compressed gasses). Any hazardous wastes produced would continue to be managed in accordance with Article 22 of the *San Francisco Health Code*.

The facility currently stores diesel to supply emergency generators in one 5,000-gallon underground storage tank (UST) to the west of the Friedman Building and one 3,000-gallon aboveground storage tank (AST) to the south of the Goodman Building. The latter tank is secured by double-wall containment.¹⁵⁶ Under the proposed project, there would be one additional emergency generator that would require additional storage of diesel fuel to be stored in an above-ground storage tank, the location and capacity of which have not yet been determined.

Compliance with the *San Francisco Health Code*, which incorporates state and federal requirements, would minimize potential exposure of site personnel and the public to any accidental releases of hazardous materials or waste and would also protect against potential environmental contamination. In addition, transportation of hazardous materials is well regulated by the California Highway Patrol and the California Department of Transportation. Therefore, the potential impacts related to the routine use, transport, and disposal of hazardous materials associated with implementation of the project would be *less than significant*.

Mitigation: None required.

Impact HZ-2: The proposed project would be constructed in proximity to hazardous materials sites compiled pursuant to *Government Code* Section 65962.5 and would 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 with Mitigation)

Hazardous Soil and Groundwater

The proposed project would disturb more than 50 cubic yards of soil in an area with suspected soil/groundwater contamination. Therefore, the project is subject to Article 22A of the *Health Code*, also

¹⁵⁶ *Ibid.*

known as the Maher Ordinance, which is administered and overseen by the San Francisco Department of Public Health (SFDPH). The Maher Ordinance requires the project sponsor to retain the services of a qualified professional to prepare a Phase I Environmental Site Assessment (ESA) that meets the requirements of *Health Code* Section 22.A.6. The Phase I is prepared to determine the potential for site contamination and level of exposure risk associated with the project. Based on that information, the project sponsor may be required to conduct soil and/or groundwater sampling and analysis. Where such analysis reveals the presence of hazardous substances in excess of state or federal standards, the project sponsor is required to submit a site mitigation plan (SMP) to SFDPH or other appropriate state or federal agency(ies), and to remediate any site contamination in accordance with an approved SMP prior to the issuance of any building permit.

In 2012, a Phase I Environmental Site Assessment (ESA) was prepared to assess the potential for site contamination.¹⁵⁷ This Phase I analyzed the entirety of the 8.7-acre Jewish Home campus. The Phase I ESA found the following Recognized Environmental Conditions (RECs).

Diesel Fuel Storage Tanks. The Jewish Home currently contains two diesel storage tanks: one 5,000-gallon underground storage tank (UST) to the west of the Friedman Building and one 3,000-gallon aboveground storage tank (AST) to the south of the Goodman Building. In addition, available maps and reports indicated that there have been several USTs at the property, including a 200-gallon tank in 1900 (no record of removal available), a 1,000-gallon tank removed from the site in 1994, and a 1,500-gallon tank removed from the site in 1998. No stained soil or odors were observed during removal of the two larger tanks in the 1990s, and no groundwater was encountered.

There is the potential to encounter previously unidentified USTs during excavation. If a previously unidentified UST were encountered, the project sponsor would be required to close the UST in accordance with Article 21 of the *San Francisco Health Code*. This article would require a closure plan identifying appropriate requirements for disposition of any remaining hazardous materials in the tank and the tank itself. The closure plan would be submitted to the City for approval prior to removal of the UST. Soil from the UST excavation, and possibly the groundwater, would also be sampled in accordance with Article 21. Upon completion of closure, a release or contamination report would be submitted to SFDPH if a release were indicated on the basis of visual observations or sampling, and a final report documenting tank removal activities and any residual contamination left in place would be submitted to SFDPH. Upon approval of this report, SFDPH would issue a Certificate of Completion. If a release were indicated, the project sponsor would be required to submit a corrective action plan, including a community health and safety plan, to SFDPH and the RWQCB, and remediation would be required in accordance with federal, state and local regulations. Alternatively, the tank could be abandoned in place if removal were infeasible. Implementation of the measures required in accordance with Article 21 of the *San Francisco Health Code* would ensure that hazardous materials impacts associated with encountering previously unidentified USTs would be *less than significant*.

¹⁵⁷ *Ibid.*

Surrounding Sites. The Phase I ESA identified two sites in the vicinity of the proposed project that were considered to have the potential to affect soil or groundwater quality on the northern portion of the Jewish Home campus: at 4285 Mission Street (former gas station) and 4298 Mission Street (existing gas station). Although located in the assumed down-gradient direction from the project site based on topography, these releases were determined have the potential to impact soil and groundwater with petroleum hydrocarbons and volatile organic compounds (VOCs).

After preparation of the Phase I ESA, and based upon site investigation and remedial actions carried out at the 4285 Mission Street site, the San Francisco Department of Public Health issued a “No Further Action” letter in July 2013.¹⁵⁸ The 4298 Mission Street case remains open.

As noted above, the Phase I ESA analyzed the entirety of the 8.7-acre Jewish Home campus, and it identified an REC on the northern portion of the Jewish Home campus, in the area proximate to the intersection of Mission Street and Silver Avenue. However, based on the October 2014 plans for the proposed project, there would be no excavation in this portion of the campus, and therefore the project would avoid disturbance of potentially contaminated groundwater or soils from the 4285 Mission Street and 4298 Mission Street releases. It is anticipated that SFPDH will concur with this conclusion upon reviewing the project pursuant to the Maher Ordinance.¹⁵⁹

The proposed project would be required to remediate potential soil or groundwater contamination described above in accordance with Article 22A of the Health Code. Therefore, hazardous materials impacts associated with contaminated soils or groundwater would be *less than significant*.

Hazardous Building Materials

As described in the Project Description, the Main Building would be demolished to allow for construction of the proposed facilities. The Main Building was completed in 1923, the Infirmary wing was added in 1931.¹⁶⁰ Therefore, both buildings were constructed prior to the bans on the manufacture and use of asbestos-containing building materials and lead-based paint in the 1970s. Therefore, there is the potential for these materials to be present in the structures that would be demolished under the proposed project. Other hazardous building materials that could be present include electrical equipment containing PCBs; fluorescent light ballasts containing PCBs or bis(2-ethylhexyl) phthalate (DEHP); and fluorescent light tubes containing mercury vapors.

If these materials were present, workers and the public could be exposed to hazardous building materials if they were not abated prior to demolition or renovation. However, as discussed below, there is a well-established regulatory framework for the abatement of asbestos-containing materials and lead-based

¹⁵⁸ San Francisco Department of Public Health (SFPDH), Remedial Action Completion Certification: Underground Storage Tank (UST) Case, Former Chevron Service Station #9-2480, 4285 Mission Street, San Francisco, LOP Site Number: 10228, July 18, 2013.

¹⁵⁹ Langan Treadwell Rollo, personal communication to Pacific Union Development Company, January 5, 2015. This document is available for review at the Planning Department, 1650 Mission Street, Suite 400, in Case File No. 2011.1323E.

¹⁶⁰ Environmental Science Associates, *Jewish Home of San Francisco Project: Historic Resources Evaluation*, prepared for the San Francisco Planning Department, May 22, 2014. This document is available for review at the Planning Department, 1650 Mission Street, Suite 400, in Case File No. 2011.1323E.

paint, and impacts related to exposure to these hazardous building materials would be less than significant with compliance with regulatory requirements. Impacts related to exposure to other hazardous building materials could be significant, as discussed below.

Asbestos-Containing Materials. Section 19827.5 of the *California Health and Safety Code* requires that local agencies not issue demolition or alteration permits until an applicant has demonstrated compliance with notification requirements under applicable federal regulations regarding hazardous air pollutants, including asbestos. The BAAQMD is vested by the California legislature with authority to regulate airborne pollutants, including asbestos, through both inspection and law enforcement, and is to be notified of any demolition or renovation project that involves the removal of 100 square feet or more of asbestos-containing materials 10 days in advance of the work.

Notification includes the names and addresses of operations and persons responsible; description and location of the structure to be demolished/alterd including size, age, and prior use; the approximate amount of friable asbestos that would be removed or disturbed; the scheduled starting and completion dates of demolition or abatement; the nature of the planned work and methods to be employed; the procedures to be employed to meet BAAQMD requirements; and the name and location of the waste disposal site to be used. Approved methods for control of asbestos-containing materials during abatement include adequate wetting of all asbestos-containing materials and providing containment with a negative air pressure ventilation system to prevent migration of asbestos-containing materials. BAAQMD randomly inspects asbestos removal operations. In addition, BAAQMD will inspect any removal operation when a complaint has been received.

The local office of the State Occupational Safety and Health Administration (Cal/OSHA) must be notified of asbestos abatement to be carried out. Asbestos abatement contractors must follow state regulations contained in 8CCR1529 and 8CCR341.6 through 341.17 where there is asbestos-related work involving 100 square feet or more of asbestos-containing material. Asbestos removal contractors must be certified as such by the Contractors Licensing Board of the State of California. The owner of the property where abatement is to occur must have a Hazardous Waste Generator Number assigned by and registered with the Office of the California Department of Health Services in Sacramento. The contractor and hauler of the material are required to file a Hazardous Waste Manifest which details the hauling of the material from the site and the disposal of it. Pursuant to California law, DBI would not issue the required permit until the applicant has complied with the notice and abatement requirements described above.

Implementation of the required procedures in accordance with the legal requirements described above, already established as a part of the permit review process, would ensure that any potential impacts due to demolition or renovation of structures with asbestos-containing materials would be *less than significant*.

Lead-based Paint. 17 CCR Section 35033 defines lead-based paint as paint that contains 1.0 milligram of lead per square centimeter of paint, or 5,000 mg/kg of lead. Section 3426 of the *San Francisco Building Code*, Work Practices for Lead-Based Paint on Pre-1979 Buildings and Steel Structures, applies to the exterior of all buildings on which original construction was completed prior to 1979 (which are assumed to have lead-based paint on their surfaces, unless demonstrated otherwise through laboratory analysis) and to any steel structures with lead-based paint, such as the Main Building. Therefore, demolition of any

exterior building features must comply with Section 3426 if the total amount of disturbance would be greater than 100 square feet. Regarding building interiors, this section of the building code applies only to the interior of residential buildings, hotels, and childcare centers, and would therefore not apply to demolition of the building interior under the proposed project.

Section 3426 of the *San Francisco Building Code* requires specific notification and work standards, and identifies prohibited work methods and penalties. The notification requirements include notification of DBI and posting of required signs. Prior to the commencement of work, the responsible party must provide written notice to the Director of DBI of the address and location of the project; the scope of work, including specific location; methods and tools to be used; the approximate age of the structure; anticipated job start and completion dates for the work; whether the building is residential or nonresidential, owner-occupied or rental property; the dates by which the responsible party has fulfilled or will fulfill any tenant or adjacent property notification requirements; and the name, address, telephone number, and pager number of the party who will perform the work. The responsible party must also post notices informing the public and adjacent property owners of the work and also restricting public access to the work area, or provide specific notice to adjacent property owners. Section 3426 also contains provisions regarding inspection and sampling for compliance by DBI, enforcement, and penalties for non-compliance with the requirements of the ordinance.

The specified performance standards include establishment of containment barriers at least as effective at protecting human health and the environment as those in the U.S. Department of Housing and Urban Development Guidelines (the most recent Guidelines for Evaluation and Control of Lead-Based Paint Hazards), and identification of practices that may not be used in disturbance or removal of lead-based paint. Any person performing work subject to the ordinance shall, to the maximum extent possible, protect the ground from contamination during exterior work and make all reasonable efforts to prevent migration of lead paint contaminants beyond containment barriers during the course of the work. Clean-up standards require the removal of visible work debris, including the use of a High Efficiency Particulate Air Filter (HEPA) vacuum following interior work.

Demolition or renovation of other structures that include lead-containing materials could result in exposure of workers and the public to lead. However, these activities would be subject to the Cal/OSHA Lead in Construction Standard (8 CCR Section 1532.1). This standard requires development and implementation of a lead compliance plan when materials containing lead would be disturbed during construction. The plan must describe activities that could emit lead, methods that will be used to comply with the standard, safe work practices, and a plan to protect workers from exposure to lead during construction activities. Cal/OSHA would require 24-hour notification if more than 100 square feet of materials containing lead would be disturbed. For activities disturbing lead-based paint, the project sponsor would also be required to comply with Section 3426 of the *San Francisco Building Code* if more than 100 square feet of lead-based paint were disturbed, although notification under the Lead in Construction Standard could satisfy the requirements of the building code.

Implementation of procedures required by Section 3426 the *San Francisco Building Code* and Lead in Construction Standard (8 CCR Section 1532.1) would ensure that potential impacts of demolition or renovation of structures with lead-based paint would be *less than significant*.

Other Hazardous Building Materials. Other hazardous building materials that could be present within the portions of the Main Building that would be demolished or renovated include electrical transformers that could contain PCBs, fluorescent light ballasts that could contain PCBs or DEHP, and fluorescent light tubes that could contain mercury vapors. Disruption of these materials could pose health concerns for construction workers if not properly handled or disposed of, a *significant* impact.

Implementation of **Mitigation Measure M-HZ-2, Hazardous Building Materials Abatement**, would require that the presence of such materials be evaluated prior to demolition or renovation and, if such materials were present, that they be properly handled during removal and building demolition or renovation. The impact would be reduced to a less-than-significant level.

Mitigation Measure M-HZ-2: Hazardous Building Materials Abatement.

The project sponsor shall ensure that any area of the Jewish Home planned for demolition or renovation is surveyed for hazardous building materials including PCB-containing electrical equipment, fluorescent light ballasts containing polychlorinated biphenyls (PCBs) or bis(2-ethylhexyl) phthalate (DEHP), and fluorescent light tubes containing mercury vapors. These materials shall be removed and properly disposed of prior to the start of demolition or renovation. Light ballasts that are proposed to be removed during renovation shall be evaluated for the presence of PCBs and in the case where the presence of PCBs in the light ballast cannot be verified, they shall be assumed to contain PCBs, and handled and disposed of as such, according to applicable laws and regulations. Any other hazardous building materials identified either before or during demolition or renovation shall be abated according to federal, state, and local laws and regulations.

Impact HZ-3: Implementation of the proposed project would not result in adverse effects related to hazardous emissions or handling of acutely hazardous materials within one-quarter mile of an existing school. (Less than Significant)

The San Francisco Christian School, Mission Preparatory School, Monroe Elementary School, and Mio Preschool are all located within one-quarter mile of the proposed project. The State of California defines extremely hazardous materials in Section 25532 (2)(g) of the *Health and Safety Code*. Construction of the proposed project would use only common hazardous materials such as paints, solvents, cements, adhesives, and petroleum products (such as asphalt, oil, and fuel), and none of these materials is considered extremely hazardous. Further, operation of the expanded Jewish Home would not involve the use of extremely hazardous materials. There would be a *less-than-significant* impact.

Mitigation: None required.

Impact HZ-4: Implementation of the proposed project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan or expose people or structures to a significant risk of loss, injury or death involving fires. (Less than Significant)

The proposed project would increase the number of residents at the facility by up to 245 people, as well as increase the number of employees and volunteers at the facility by up to 135 workers and volunteers. The additional residents, employees, and volunteers would also increase the associated number of daily

visitors. Project construction would have to conform to the provisions of the *California Building Standards Code* and the *San Francisco Building Code*, which require additional life-safety protections and the final building plans for the expanded facilities would be reviewed by the San Francisco Fire Department (as well as DBI) to ensure conformance with the applicable provisions, including development of an emergency procedure manual and an exit drill plan.

Potential fire hazards, including those associated with underground storage of diesel fuel would be addressed during the permit review process to ensure adequacy of emergency equipment (e.g. hydrant water pressure) and emergency access. The use of hazardous materials is regulated by the SFDPH. To comply with hazardous materials regulations, the Jewish Home would update its Hazardous Materials Business Plan, which would include site-specific emergency response procedures for hazardous materials. Consequently, impacts of fires and interference with emergency response plan implementation would be *less than significant*.

Mitigation: None required.

Impact C-HZ-1: The proposed project, in combination with past, present, and reasonably foreseeable future projects in the site vicinity, would not result in a considerable contribution to cumulative impacts related to hazardous materials. (Less than Significant)

Hazardous materials impacts related to the project could result from use of hazardous materials and demolition of structures that contain hazardous building materials. These impacts would be primarily restricted to the project site and immediate vicinity; therefore, the geographic scope for cumulative impacts related to hazards includes the project site and immediate vicinity. Given there are no proposed projects in the immediate vicinity, the potential for combined effects would be low.

Use of Hazardous Materials

As discussed in Impact HZ-1, the proposed project could involve an increase in the use of hazardous materials and generation of hazardous wastes during operation. Similarly, cumulative projects could also include an increase in the use of hazardous materials and generation of hazardous wastes. However, the proposed project and all reasonably foreseeable cumulative projects would comply with Articles 21, 21A, and 22 of the *San Francisco Health Code* which would minimize potential exposure of site personnel and the public to any accidental releases of hazardous materials or waste and would also protect against potential environmental contamination. With implementation of these regulatory requirements, cumulative impacts related to the use of hazardous materials and generation of hazardous wastes would be *less than significant*.

Exposure to Hazardous Materials in Soil and Groundwater

As discussed in Impact HZ-2, the proposed project and many of the cumulative projects could encounter previously unidentified USTs, as could cumulative projects. However, construction activities at the project site and for cumulative, reasonably foreseeable future projects would be subject to the regulatory requirements discussed in Impact HZ-2, including Articles 21 and 22A of the *San Francisco Health Code*.

Because each project would need to assess the potential for soil and groundwater contamination to occur, and implement requirements in compliance with the *Health Code* for any unacceptable risks identified in accordance with these regulatory requirements, cumulative impacts related to exposure to hazardous materials in soil and groundwater would be *less than significant*.

Hazardous Building Materials

As discussed in Impact HZ-2, hazardous building materials could be encountered during demolition of the Main Building and Infirmary wing. Cumulative projects would also include demolition and renovation that could encounter hazardous building materials. However, abatement of asbestos-containing and lead-containing materials would be subject to the well-established regulatory requirements discussed in Impact HZ-2. With implementation of these regulatory requirements, cumulative impacts related to encountering asbestos-containing and lead-based materials would be *less than significant*.

As for the proposed project, cumulative projects could encounter other hazardous building materials during demolition or renovation, including electrical transformers that could contain PCBs, fluorescent light ballasts that could contain PCBs or DEHP, and fluorescent light tubes that could contain mercury vapors. The regulatory framework for handling these materials is less-well established, and disruption of these materials could pose health concerns for construction workers if not properly handled or disposed of. However, such effects would be project-specific impacts that would not be likely to combine with other impacts to result in cumulative effects, and the project's contribution to any cumulative impacts related to hazardous building materials would not be cumulatively considerable, and the impact would be *less than significant*.

Interference with an Adopted Emergency Response Plan or Emergency Evacuation Plan

Like the proposed project, cumulative projects in the area would be subject to life safety requirements of the *Building and Fire Codes*. With implementation of these regulatory requirements, cumulative impacts related to interference with an adopted emergency response plan or emergency evacuation plan would be *less than significant*.

Mitigation: None required.

Topics:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Not Applicable
16. MINERAL AND ENERGY RESOURCES— Would the project:					
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒	☐
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☒	☐

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
16. MINERAL AND ENERGY RESOURCES (continued)					
c) Encourage activities which result in the use of large amounts of fuel, water, or energy, or use these in a wasteful manner?	☐	☐	☒	☐	☐

Impact ME-1: The proposed project would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state. (No Impact)

The project site is mapped by the California Geologic Survey as either MRZ-1 or MRZ-4, indicating that substantial mineral resources do not occur at the site.¹⁶¹ Therefore, construction and operation of the proposed project would not result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan. There would be *no impact*.

Mitigation: None required.

Impact ME-2: The proposed project would not result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan. (No Impact)

There are no mineral resources identified at the project site and it is not an important mineral resource recovery site. The *San Francisco General Plan* does not identify any areas of important mineral resources in San Francisco. There would be *no impact*.

Mitigation: None required.

Impact ME-3: The proposed project would not encourage activities that result in the use of large amounts of fuel, water, or energy, or use these resources in a wasteful manner. (Less than Significant)

The proposed project would include expansion of existing uses, which would consume incrementally more energy than under existing conditions. These expanded uses would not result in the use of large amounts of fuel, water, or energy in the context of energy use throughout the City and region. The Greenhouse Gas analysis includes a description of energy-conservation measures that would be implemented or continued under the proposed project.

The project's energy demand would be typical for a development of this scope and nature and would comply with current State and local codes concerning energy consumption, including Title 24 of the

¹⁶¹ California Department of Conservation, Division of Mines and Geology (CDMG), 1987. Mineral Land Classification: Aggregate Materials in the San Francisco-Monterey Bay Area, Special Report 146, Part II. Available online at: <https://archive.org/stream/minerallandclass00stin#page/n5/mode/2up>, accessed June 13, 2014.

California Code of Regulations, enforced by DBI. The proposed project would also be required to comply with the City of San Francisco green building ordinance for municipal buildings, as outlined in Chapter 7 of the *Environment Code*.¹⁶²

The project site is served by existing utility systems, and it would not require a major expansion of power facilities. As stated in the Utilities analysis, the project would be served by adequate water supplies. In addition, the project site is located in a developed urban area. The area is served by the SFMTA. Use of this transit system by employees, volunteers, and visitors would reduce the amount of energy expended in private automobiles.

Therefore, the energy demand associated with the proposed project would result in a *less-than-significant* impact.

Mitigation: None required.

Impact C-ME-1: The proposed project, in combination with other past, present, and reasonably foreseeable future projects, would not result in significant adverse cumulative mineral and energy impacts. (Less than Significant)

The geographic scope for potential cumulative mineral resources impacts encompasses the aggregate minerals in the South San Francisco Bay Production-Consumption Region, where development projects create demand for mineral resources and the potential for cumulative impacts exists. Similar to the project area, the project vicinity is mapped by the California Geologic Survey as either MRZ-1 or MRZ-4, indicating that substantial mineral resources do not occur at the site.¹⁶³ As stated above, the project site is not designated as a statewide-, regionally-, or locally-important mineral resource recovery site, and the proposed project would result in no impact to mineral resources. Therefore, the project would not contribute to any cumulative impact to mineral resources.

The geographic scope for potential cumulative impacts to energy resources impacts encompasses the SFPUC water and PG&E power supply system. Similar to the proposed project, projects within the vicinity or the region would require the use of fuel, water, or energy.

Like the proposed project, cumulative projects in the area would be required to comply with the *California Green Building Standards Code* at a minimum and would also be subject to the San Francisco green building ordinance, which is more stringent. Because these building codes encourage sustainable construction practices related to planning and design, energy efficiency, and water efficiency and conservation, energy consumption would be expected to be reduced compared to conditions without such regulations. Therefore, cumulative impacts related to wasteful use of energy resources would be *less than significant*.

¹⁶² City and County of San Francisco, Department of Building Inspection, May 31, 2013. Green Building Ordinance website. Available online at: <http://sfdbi.org/index.aspx?page=268>, accessed November 11, 2013.

¹⁶³ California Department of Conservation, Division of Mines and Geology (CDMG), 1987. Mineral Land Classification: Aggregate Materials in the San Francisco-Monterey Bay Area, Special Report 146, Part II. Available online at: <https://archive.org/stream/minerallandclass00stin#page/n5/mode/2up>, accessed January 14, 2014.

Mitigation: None required.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
17. AGRICULTURE AND FOREST RESOURCES: In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.— Would the project					
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒	☐
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒	☐
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in <i>Public Resources Code</i> Section 12220(g)) or timberland (as defined by <i>Public Resources Code</i> Section 4526)?	☐	☐	☐	☒	☐
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒	☐
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or forest land to non-forest use?	☐	☐	☐	☒	☐

Impact AG-1: Construction and operation of the proposed project would not (a) convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance; (b) conflict with existing zoning for agricultural use, or a Williamson Act contract; (c) conflict with existing zoning for or cause rezoning of forest land or timberland; (d) result in the loss of forest land or conversion of forest land to non-forest use; or (e) involve other changes in the existing environment that, due to their location or nature, could result in conversion of Farmland to non-agricultural use or forest land to non-forest use. (No Impact)

The project site is located within an urban area in the City and County of San Francisco. The California Department of Conservation's Farmland Mapping and Monitoring Program identifies the site as *Urban and Built-Up Land*, which is defined as "...land [that] is used for residential, industrial, commercial, institutional, public administrative purposes, railroad and other transportation yards, cemeteries, airports, golf courses, sanitary landfills, sewage treatment, water control structures, and other developed purposes."¹⁶⁴

¹⁶⁴ California Department of Conservation, Division of Land Resource Protection (DLRP), Bay Area Region Important Farmland 2010, published July 2013. Available online at ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/regional/2010/bay_area_fmmp2010.pdf. Accessed October 11, 2013.

The project site contains no Prime Farmland, Unique Farmland, Farmland of Statewide Importance, forest, or timberlands; does not support agricultural or timber uses; is not zoned for agricultural or timber uses;¹⁶⁵ and is not under a Williamson Act contract.¹⁶⁶ The project site is designated as “urban land” by the United States Department of Agriculture Natural Resources Conservation Services.¹⁶⁷

The project would not displace existing farmland or forest land. There would be *no impact*.

Mitigation: None required.

Impact C-AG-1: The proposed project, in combination with other past, present, and reasonably foreseeable future projects, would not result in significant adverse cumulative agricultural resource or forestry impacts. (No Impact)

The geographic scope for potential cumulative agricultural resources impacts encompasses land uses in the vicinity of the Jewish Home. The area generally includes the Excelsior and Outer Mission neighborhoods. Similar to the project site, the project vicinity does not include any agricultural or forestry/timberland resources. Neither the proposed project nor any of the nearby projects would result in conversion of farmland or forest land to non-farm or non-forest use, nor would any of the proposed developments conflict with existing agricultural or forest use or zoning for these uses. Therefore, the proposed project in combination with other projects would not result in cumulative impacts to such resources. There would be *no impact*.

Mitigation: None required.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
18. MANDATORY FINDINGS OF SIGNIFICANCE— Would the project:					
a) Have the potential to 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, 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?	☐	☒	☐	☐	☐

¹⁶⁵ San Francisco Planning Department, Zoning Map, available online: <http://www.sf-planning.org/index.aspx?page=1569>, accessed February 12, 2013.

¹⁶⁶ California Department of Conservation *ibid*.

¹⁶⁷ United States National Resources Conservation Service. Web Soil Survey, website: <http://websoilsurvey.sc.egov.usda.gov/App/HomePage.htm>, United States Department of Agriculture, accessed December 30, 2013.

Topics:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Not Applicable
18. MANDATORY FINDINGS OF SIGNIFICANCE (continued)					
b) Have impacts that would be 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 that would cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐	☐

As discussed in the above text, the project is anticipated to have only *less-than-significant* impacts in the areas discussed with the implementation of identified mitigation measures. Significant impacts to cultural resources, noise, and hazardous materials would be mitigated through implementation of mitigation measures described above, summarized in this section, and presented in full in Section F.

E.19.a) Construction activities have the potential to result in significant impacts to any below-ground archeological resources, paleontological resources, and human remains. Any adverse effect to CEQA-significant resources resulting from soils disturbance from the proposed project would be reduced to a *less-than-significant* level by implementation of **Mitigation Measure M-AQ-2: Accidental Discovery of Archeological Resources**, **M-CP-3: Accidental Discovery of Paleontological Resources**, and **M-CP-4: Accidental Discovery of Human Remains**.

E.19.b) For all topics that are analyzed in this Initial Study, the proposed project would not have cumulatively considerable impacts, as discussed under each applicable environmental topic.

E.19.c) Regarding adverse effects on human beings, during construction of the proposed project, equipment noise would be above levels specified by *Section 2907 of the San Francisco Police Code*. Implementation of **Mitigation Measure M-NO-2: General Construction Noise Control Measures**, would reduce noise levels to *less-than-significant* levels. Construction and operations may occur in an area with poorer air quality. Implementation of **Mitigation Measure M-AQ-2: Construction Air Quality** and **M-AQ-4: Best Available Control Technology for Diesel Generators** would reduce the effects associated with toxic air contaminants. Also, the proposed project would be constructed on a site identified on a list of hazardous materials sites, and excavation could potentially expose workers and the public to hazardous materials. Implementation of **Mitigation Measure M-HZ-2: Hazardous Building Materials Abatement** would reduce this impact to a less-than-significant level.

F. MITIGATION MEASURES AND IMPROVEMENT MEASURES

Mitigation Measures

Mitigation Measure M-CP-2: Accidental Discovery of Archeological Resources.

The following measures shall be implemented should construction activities result in the accidental discovery of a cultural resource:

The following mitigation measure is required to avoid any potential adverse effect from the proposed project on accidentally discovered buried or submerged historical resources as defined in CEQA Guidelines Section 15064.5(a)(c). The project sponsor shall distribute the Planning Department archeological resource "ALERT" sheet to the project prime contractor; to any project subcontractor (including demolition, excavation, grading, foundation, etc. firms); or utilities firm involved in soils disturbing activities within the project site. Prior to any soils disturbing activities being undertaken each contractor is responsible for ensuring that the "ALERT" sheet is circulated to all field personnel including, machine operators, field crew, supervisory personnel, etc. The project sponsor shall provide the Environmental Review Officer (ERO) with a signed affidavit from the responsible parties (prime contractor, subcontractor(s), and utilities firm) to the ERO confirming that all field personnel have received copies of the Alert Sheet.

Should any indication of an archeological resource be encountered during any soils disturbing activity of the project, the project Head Foreman and/or project sponsor shall immediately notify the ERO and shall immediately suspend any soils disturbing activities in the vicinity of the discovery until the ERO has determined what additional measures should be undertaken.

If the ERO determines that an archeological resource may be present within the project site, the project sponsor shall retain the services of a qualified archeological consultant, based on standards developed by the Planning Department archeologist. The archeological consultant shall advise the ERO as to whether the discovery is an archeological resource, retains sufficient integrity, and is of potential scientific/historical/cultural significance. If an archeological resource is present, the archeological consultant shall identify and evaluate the archeological resource. The archeological consultant shall make a recommendation as to what action, if any, is warranted. Based on this information, the ERO may require, if warranted, specific additional measures to be implemented by the project sponsor.

Measures might include: preservation in situ of the archeological resource; an archeological monitoring program; or an archeological testing program. If an archeological monitoring program or archeological testing program is required, it shall be consistent with the Environmental Planning (EP) division guidelines for such programs. The ERO may also require that the project sponsor immediately implement a site security program if the archeological resource is at risk from vandalism, looting, or other damaging actions.

The project archeological consultant shall submit a Final Archeological Resources Report (FARR) to the ERO that evaluates the historical significance of any discovered archeological resource and describing the archeological and historical research methods employed in the archeological monitoring/data recovery program(s) undertaken. Information that may put at risk any archeological resource shall be provided in a separate removable insert within the final report.

Copies of the Draft FARR shall be sent to the ERO for review and approval. Once approved by the ERO, copies of the FARR shall be distributed as follows: California Archeological Site Survey Northwest Information Center (NWIC) shall receive one (1) copy and the ERO shall receive a copy of the transmittal of the FARR to the NWIC. The Environmental Planning division of the Planning

Department shall receive one bound copy, one unbound copy and one unlocked, searchable PDF copy on CD three copies of the FARR along with copies of any formal site recordation forms (CA DPR 523 series) and/or documentation for nomination to the National Register of Historic Places/California Register of Historical Resources. In instances of high public interest or interpretive value, the ERO may require a different final report content, format, and distribution than that presented above.

Mitigation Measure M-CP-3: Accidental Discovery of Paleontological Resources.

The following measures shall be implemented should construction result in the accidental discovery of paleontological resources:

To reduce the potential for the proposed project to result in a significant impact on paleontological resources, the project sponsor shall arrange for a paleontological training by a qualified paleontologist regarding the potential for such resources to exist in the project site and how to identify such resources. The training could consist of a recorded presentation that could be reused for new personnel. The training shall also include a review of penalties for looting and disturbance of these resources. An alert sheet shall be prepared by the qualified paleontologist and shall include the following:

1. A discussion of the potential to encounter paleontological resources;
2. Instructions for reporting observed looting of a paleontological resource; and instructions that if a paleontological deposit is encountered within a project area, all soil-disturbing activities in the vicinity of the deposit shall cease within 50 feet and the ERO shall be notified immediately; and,
3. Who to contact in the event of an unanticipated discovery.

If potential fossils are discovered by construction crews, all earthwork or other types of ground disturbance within 50 feet of the find shall stop immediately until the qualified professional paleontologist can assess the nature and importance of the find. Based on the scientific value or uniqueness of the find, the paleontologist may record the find and allow work to continue, or recommend salvage and recovery of the fossil. The paleontologist may also propose modifications to the stop-work radius based on the nature of the find, site geology, and the activities occurring on the site. If treatment and salvage is required, recommendations shall be consistent with Society of Vertebrate Paleontology (1995) guidelines and currently accepted scientific practice, and shall be subject to review and approval by the ERO or designee. If required, treatment for fossil remains may include preparation and recovery of fossil materials so that they can be housed in an appropriate museum or university collection, and may also include preparation of a report for publication describing the finds. The project sponsor shall be responsible for ensuring that treatment is implemented and reported to the San Francisco Planning Department. If no report is required, the project sponsor shall nonetheless ensure that information on the nature, location, and depth of all finds is readily available to the scientific community through university curation or other appropriate means.

Mitigation Measure M-CP-4: Accidental Discovery of Human Remains.

The following measures shall be implemented should construction activities result in the accidental discovery of human remains and associated cultural materials:

The treatment of human remains and of associated or unassociated funerary objects discovered during any soil-disturbing activities shall comply with applicable state laws. This shall include

immediate notification of the coroner of the county within which the project is located and, in the event of the coroner's determination that the human remains are Native American, notification of the California Native American Heritage Commission, which shall appoint a most likely descendant (MLD) (PRC Section 5097.98). The archeological consultant, project sponsor, and MLD shall make all reasonable efforts to develop an agreement for the treatment, with appropriate dignity, of human remains and associated or unassociated funerary objects (CEQA Guidelines Section 15064.5[d]). The agreement should take into consideration the appropriate excavation, removal, recordation, analysis, custodianship, curation, and final disposition of the human remains and associated or unassociated funerary objects. The PRC allows 24 hours to reach agreement on these matters. If the MLD and the other parties do not agree on the reburial method, the project sponsor shall follow Section 5097.98(b) of the PRC, which states that "the landowner or his or her authorized representative shall reinter the human remains and items associated with Native American burials with appropriate dignity on the property in a location not subject to further subsurface disturbance."

Mitigation Measure NO-2: General Construction Noise Control Measures.

To ensure that the noise from project construction activities is minimized to the maximum extent feasible, the project sponsor shall undertake the following:

- The project sponsor shall require the general contractor to ensure that equipment and trucks used for project construction utilize the best available noise control techniques (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures and acoustically-attenuating shields or shrouds, wherever feasible).
- The project sponsor shall require the general contractor to locate stationary noise sources (such as compressors) as far from adjacent or nearby sensitive receptors as possible, to muffle such noise sources, and to construct barriers around such sources and/or the construction site, which could reduce construction noise by as much as five dBA. To further reduce noise, the contractor shall locate stationary equipment in pit areas or excavated areas, if feasible.
- The project sponsor shall require the general contractor to use impact tools (e.g., jack hammers, pavement breakers, and rock drills) that are hydraulically or electrically powered wherever possible to avoid noise associated with compressed air exhaust from pneumatically powered tools. Where use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust shall be used, along with external noise jackets on the tools, which could reduce noise levels by as much as 10 dBA.
- The project sponsor shall include noise control requirements in specifications provided to construction contractors. Such requirements could include, but not be limited to, performing all work in a manner that minimizes noise to the extent feasible; use of equipment with effective mufflers; undertaking the most noisy activities during times of least disturbance to surrounding residents and occupants, as feasible; and selecting haul routes that avoid residential buildings inasmuch as such routes are otherwise feasible.
- Prior to the issuance of each building permit, along with the submission of construction documents, the project sponsor shall submit to the Planning Department and Department of Building Inspection (DBI) a list of measures to respond to and track complaints pertaining to construction noise. These measures shall include (1) a procedure and phone numbers for notifying DBI, the Department of Public Health, and the Police Department (during regular construction hours and off-hours); (2) signs posted along all frontages of the project site describing noise complaint procedures and a complaint hotline number that shall be answered at all times during construction; (3) designation of an on-site construction complaint and

enforcement manager for the project; and (4) notification of neighboring residents and non-residential building managers within 300 feet of the project construction area at least 30 days in advance of extreme noise generating activities (defined as activities generating noise levels of 90 dBA or greater) about the estimated duration of the activity.

Mitigation Measure M-AQ-4. Permitting of Diesel Generators.

The project sponsor shall ensure that the proposed new backup generator at the project site meets or exceeds one of the following emission standards for particulate matter: (1) Tier 4 certified engine, or (2) Tier 2 or Tier 3 certified engine that is equipped with a California Air Resources Board (ARB) Level 3 Verified Diesel Emissions Control Strategy (VDECS). A non-verified diesel emission control strategy may be used if the filter has the same particulate matter reduction as the identical ARB verified model and if the Bay Area Air Quality Management District (BAAQMD) approves of its use. The project sponsor shall also ensure that all existing generators at the project site either meet one of the above standards or are within the BAAQMD single-source threshold of 10 in one million cancer risk. Such revisions may include, as necessary to bring emissions below the threshold(s) noted herein, actions such as retrofitting and/or replacement of one, two, or all three of the existing generators. The project sponsor shall submit documentation of compliance with the BAAQMD New Source Review permitting process (Regulation 2, Rule 2, and Regulation 2, Rule 5) and the emission standard requirement of this mitigation measure, with respect to the new generator, and shall submit documentation of compliance with the emission standard requirement of this mitigation measure, with respect to the existing generators, to the Planning Department prior to issuance of a Certificate of Occupancy for the first new building to be constructed.

Mitigation Measure M-HZ-2: Hazardous Building Materials Abatement.

The project sponsor shall ensure that any area of the Jewish Home planned for demolition or renovation is surveyed for hazardous building materials including PCB-containing electrical equipment, fluorescent light ballasts containing polychlorinated biphenyls (PCBs) or bis(2-ethylhexyl) phthalate (DEHP), and fluorescent light tubes containing mercury vapors. These materials shall be removed and properly disposed of prior to the start of demolition or renovation. Light ballasts that are proposed to be removed during renovation shall be evaluated for the presence of PCBs and in the case where the presence of PCBs in the light ballast cannot be verified, they shall be assumed to contain PCBs, and handled and disposed of as such, according to applicable laws and regulations. Any other hazardous building materials identified either before or during demolition or renovation shall be abated according to federal, state, and local laws and regulations.

Improvement Measures

Improvement Measure I-TR-2: Construction Management

Traffic Control Plan for Construction – As an improvement measure to reduce potential conflicts between construction activities and pedestrians, transit and autos at the project site, the contractor shall add certain measures to the required traffic control plan for project construction. In addition to the requirements for a construction traffic control/management plan, the project shall include the following measures.

Limitation on Direction of Construction Traffic During Peak Hours – To minimize the construction-related disruption of the general traffic flow on adjacent streets during the AM and PM peak periods (and, specifically, to minimize any potential conflict with the nearby Mio Preschool's drop-

off and pick periods), the construction contractor shall include in the Construction Management Plan methods to discourage truck movements and deliveries from arriving at the project site via Mission Street coming from the west (i.e. from the direction of Ocean Avenue and Geneva Avenue) during peak hours (generally 7:00 to 9:00 a.m. and 4:00 to 6:00 p.m., or other times, as determined by SFMTA and its Transportation Advisory Staff Committee [TASC]). The above-cited morning and afternoon peak hours of limited truck delivery direction coincide with the nearby Mio Preschool's drop-off and pick-up time periods.

Carpool and Transit Access for Construction Workers –To minimize parking demand and vehicle trips associated with construction workers, the construction contractor shall include methods to encourage carpooling and transit access to the project site by construction workers in the Construction Management Plan.

Project Construction Updates for Adjacent Businesses and Residents – To minimize construction impacts on access for nearby institutions and businesses, the Project Sponsor shall provide nearby residences and adjacent businesses with regularly-updated information (typically in the form of website, news articles, on-site posting, mailing, etc.) regarding project construction, including a project construction contact person, construction activities, duration, peak construction activities (e.g., concrete pours), travel lane closures, and lane closures.

G. PUBLIC NOTICE AND COMMENT

The project sponsor hosted a community meeting on January 15, 2015, to explain the project and the environmental review process. The Planning Department mailed a Notification of Project Receiving Environmental Review on January 23, 2015. The notice was sent to property owners and tenants within 300 feet of the project site, neighborhood organizations, and local government representative. In response to the notice, community members submitted comments regarding:

- removal of existing trees (discussed in Section E.12, Biological Resources);
- height and bulk and consistency with existing controls (analyzed in Section C: Compatibility with Existing Zoning and Plans, and Section E.1: Land Use and Land Use Planning);
- impacts to potentially historic features (analyzed in Section E.3, Cultural and Paleontological Resources);
- impacts on provision of emergency services (analyzed in Section E.11);
- impacts related to 45-degree angled parking along Lisbon Street, the proposed new curb cut on Avalon Avenue, vehicular congestion, possibility of transit service delays, construction lane closures, and pedestrian-loading conflicts, (see Section E.4, Transportation and Circulation);
- proximity to a local preschool (discussed in Sections E.4: Transportation and Circulation, E.5: Noise, E.6: Air Quality, and E.15: Hazards and Hazardous Materials);
- air quality and noise pollution (analyzed in Sections E.5: Noise, E.6: Air Quality);
- water pollution (discussed in Section E.14: Hydrology and Water Quality);
- shading (discussed in Section E.8: Wind and Shadow);
- water retention or renewable energy. The project's impacts on water demand and energy resources are analyzed in Sections E.10 and E.16, respectively.
- provision of recreational resources. The project's impacts on recreational resources are analyzed in Section E.9.

The Planning Department also received comments regarding issues not addressed under CEQA. These are summarized as follows:

- light pollution and façade treatments. These are aesthetic concerns not covered under CEQA for this project, pursuant to SB 743 (see Section E).
- future development of the project site. Future development is not proposed at this time and is not analyzed in this document.
- location and inclusion of specific retail uses. The project's retail space will be tenanted based on market demands.
- existing landscape maintenance, drainage problems, blocked driveways, lack of on-street parking, and street maintenance. The comments have been forwarded to the project sponsor and SFDPW for consideration.
- use of union labor. The project will result in a net increase in 135 employees and volunteers. This comment has been forwarded to the project sponsor for consideration.

H. 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.

DATE

May 27, 2015



Sarah B. Jones
Environmental Review Officer
for

John Rahaim
Director of Planning

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