SAN FRANCISCO
PLANNING DEPARTMENT

Notice of Availability of and Intent to Adopt a Mitigated Negative Declaration

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San Francisco,
CA 94103-2479

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415.558.6377

Date:	October 30, 2019
Case No.:	**2017-005154ENV**
Project Title:	**1300 Columbus Avenue**
Zoning:	C-2 (Community Business) Use District, Waterfront Special Use District 40-X Height and Bulk District
Block/Lot:	0023/005 and 0023/004
Lot Size:	88,203 square feet
Project Sponsor	Jody Knight, Reuben, Junius & Rose, LLP (415) 567-9000
Lead Agency:	San Francisco Planning Department
Staff Contact:	Megan Calpin – (415) 575-9049 megan.calpin@sfgov.org

This notice is to inform you of the availability of the environmental review document concerning the proposed project as described below. The document is a preliminary mitigated negative declaration (PMND), containing information about the possible environmental effects of the proposed project. The PMND documents the determination of the planning department that the proposed project could not have a significant adverse effect on the environment. Preparation of a mitigated negative declaration does not indicate a decision by the City to carry out or not to carry out the proposed project.

Project Description: The proposed project at 1300 Columbus Avenue is located on the northeast side of Columbus Avenue within the North Beach and Fisherman's Wharf neighborhoods. The site (Assessor's Block 0023, Lots 005 and 004) consists of an 81,060-square-foot lot occupied by a five-story (40-foot-tall), 249,350-square-foot hotel over a 79,440-square-foot basement parking garage, 7,960 square feet of open space, and a 13,158-square-foot surface parking lot. The project site also contains a 7,143-square-foot privately owned alley. The hotel building was constructed in 1970 and currently has 342 guest rooms.

The proposed project would result in an 87,620-square-foot expansion of the existing building with development of a new, four-story (approximately 40-foot-tall[1]) hotel wing along North Point Street and Columbus Avenue, connected to the existing hotel and located primarily within the footprint of the existing surface parking lot. The new structure would consist of 79,520 square feet of new hotel uses, including 174 new guestrooms, 8,100 square feet of ground-level retail space, and 290 square feet of net new open space uses. In total, the proposed project would result in a 336,970-square-foot building, with 328,870 square feet of hotel uses, 8,100 square feet of retail space, and 8,250 square feet of open space. The hotel capacity would be increased to a total of 516 guest rooms. A 2,400-square-foot roof deck above the fifth floor on the north corner of the existing hotel is also proposed. Overall, the proposed project would result in the removal of

[1] The hotel wing addition, as measured to the roofline from the midpoint along the Columbus Avenue street frontage would be 39 feet, 5 inches tall and the tallest point of the addition as measured from grade at North Point Street would be 44 feet, 11 inches.

54 existing off-street parking spaces; a total of 166 off-street parking spaces in the basement garage would be provided on the project site at project completion. Eighteen *class 1* bicycle spaces would be provided in a bike room on the ground floor and 20 *class 2* bicycle parking spaces would be provided along Leavenworth Street. Construction of the proposed project would occur over an approximately 16-month period. The proposed project would require excavation of approximately 820 cubic yards to a depth of 6 feet below the existing basement to accommodate foundations. Pile installation would require soil disturbance to a depth of approximately 70 feet below the basement slab. The proposed project would require a Conditional Use Authorization and Planned Unit Development approvals.

The PMND is available to view or download from the planning department's environmental review documents web page (https://sfplanning.org/environmental-review-documents). Paper copies are also available at the Planning Information Center (PIC) counter on the ground floor of 1660 Mission Street, San Francisco. If you have questions concerning environmental review of the proposed project, contact the planning department staff contact listed above.

Within 20 calendar days following publication of the PMND (i.e., by 5:00 p.m. on **November 19, 2019)**, any person may:

1) Review the PMND as an informational item and take no action;

2) Make recommendations for amending the text of the document. The text of the PMND may be amended to clarify or correct statements and may be expanded to include additional relevant issues or to cover issues in greater depth. This may be done **without** the appeal described below; **OR**

3) Appeal the determination of no significant effect on the environment to the planning commission in a letter which specifies the grounds for such appeal, accompanied by a $640 check payable to the San Francisco Planning Department.[2] An appeal requires the Planning Commission to determine whether or not an environmental impact report must be prepared based upon whether or not the proposed project could cause a substantial adverse change in the environment. Send the appeal letter to the Planning Department, Attention: Lisa Gibson, 1650 Mission Street, Suite 400, San Francisco, CA 94103 or emailed to lisa.gibson@sfgov.org. **The letter must be accompanied by a check in the amount of $640 payable to the San Francisco Planning Department, and must be received by 5:00 p.m. on November 19, 2019.** The appeal letter and check may also be presented in person at the PIC counter on the first floor of 1660 Mission Street, San Francisco.

In the absence of an appeal, the mitigated negative declaration shall be made final, subject to necessary modifications, after 20 days from the date of publication of the PMND. If the PMND is appealed, the Final Mitigated Negative Declaration (FMND) may be appealed to the Board of Supervisors. The first approval action, as identified in the initial study, would establish the start of the 30-day appeal period for the FMND pursuant to San Francisco Administrative Code section 31.16(h).

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

[2] Upon review by the planning department, the appeal fee may be reimbursed for neighborhood organizations that have been in existence for a minimum of 24 months.

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PLANNING DEPARTMENT

Preliminary Mitigated Negative Declaration

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Lead Agency:	San Francisco Planning Department
Staff Contact:	Megan Calpin – (415) 575-9049 megan.calpin@sfgov.org

PROJECT DESCRIPTION:

The project site is located on the northeast side of Columbus Avenue within the North Beach and Fisherman's Wharf neighborhoods. The site is located within the block bounded by Beach Street to the north, Jones Street to the east, North Point Street to the south, Columbus Avenue to the southwest, and Leavenworth Street to the west. The project site ranges from 5 to 15 feet above mean sea level and consists of an 81,060-square-foot lot occupied by a five-story (40-foot-tall), 249,350-square-foot hotel over a 79,440-square-foot basement garage with 171 parking spaces, 7,960 square feet of ground level open space, and a 13,158-square-foot (49-space) surface parking lot. The project site also contains a 7,143-square-foot privately owned alley. The hotel building was constructed in 1970 and currently has 342 guest rooms.

The proposed project would result in an 87,620-square-foot expansion of the existing hotel building with development of a new, four-story (approximately 40-foot-tall) hotel wing[1] along North Point Street and Columbus Avenue, connected to the existing hotel and located primarily within the footprint of the existing surface parking lot. The new structure would consist of 79,520 square feet of new hotel uses, including 174 new guestrooms, 8,100 square feet of ground-level retail, and 290 square feet of net new open space uses. In total, the proposed project would result in a 336,970-square-foot building, with 328,870 square feet of hotel uses in the basement through fifth levels, 8,100 square feet of ground floor retail space, and 8,250 square feet of private ground level open space. The hotel capacity would be increased from 342 guest rooms to a total of to 516 guest rooms. A 2,400-square-foot roof deck above the fifth floor on the north corner of

[1] The hotel wing addition, as measured to the roofline from the midpoint along the Columbus Avenue street frontage would be 39 feet, 5 inches tall and the tallest point of the addition as measured from grade at North Point Street would be 44 feet, 11 inches.

the existing hotel building is also proposed. The roof deck would primarily provide open space amenities for hotel guests and may also be used for private events but would not be open to the general public.

To accommodate the proposed expansion, the project would include demolition of the existing two-story hotel entry wing located near Columbus Avenue and North Point Street, removal of the 49-space surface parking lot and existing swimming pool, removal of some exterior walls to connect the existing and proposed new hotel wing, and the addition of a new 16-foot-tall elevator tower.

The existing basement level would be retained with some modifications to the existing parking configuration. Overall, the proposed project would result in the removal of 54 existing off-street parking spaces, including 49 surface parking spaces and 5 basement garage spaces; a total of 166 off-street parking spaces in the existing basement garage would be provided on the project site at project completion. Eighteen *class 1* bicycle spaces would be provided in a bike room on the ground floor and 20 *class 2* bicycle parking spaces would be provided along Leavenworth Street.[2]

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 the Significance of the Environmental Effects Caused by a Project), 15065 (Mandatory Findings of Significance), and 15070 (Decision to prepare a negative or mitigated negative declaration), and the following reasons as documented in the initial evaluation (initial study) for the project, which is attached.

Mitigation measures are included in this project to avoid potentially significant effects. See Section F, Mitigation Measures and Improvement Measures, p. 131.

cc: Jody Knight, Reuben, Junius & Rose, LLP (Project Sponsor)
Michelle Taylor, San Francisco Planning Department (Preservation Planner)
Carolyn Fahey, San Francisco Planning Department (Current Planner)

[2] *Class 1* bicycle parking spaces are spaces in secure, weather-protected facilities intended for use as long-term, overnight, and work-day bicycle storage. *Class 2* bicycle parking spaces are spaces located in a publicly accessible, highly visible location intended for transient or short-term use. Each *class 2* rack serves two bicycles.

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Initial Study

1300 Columbus Avenue

Planning Department Case No. 2017-005154ENV

A. PROJECT DESCRIPTION

Project Location and Site Characteristics

The 88,203-square-foot (approximately 2.02-acre) irregularly-shaped project site is located on the northeast side of Columbus Avenue (Assessors Block 0023, Lot 005 and Lot 004), within the city's North Beach and Fisherman's Wharf neighborhoods. The site is located within the block bounded by Beach Street to the north, Jones Street to the east, North Point Street to the south, Columbus Avenue to the southwest, and Leavenworth Street to the west (see **Figure 1, Project Vicinity Map** and **Figure 2, Aerial Photograph of the Project Site and Surrounding Land Uses**, pp. 7-8, respectively).

The project site slopes gently from northeast to southwest from approximately 5 feet to 15 feet above mean sea level and consists of an 81,060-square-foot lot occupied by a five-story (40-foot-tall), 249,350-square-foot hotel over a 79,440-square-foot basement garage with 171 parking spaces, 7,960 square feet of ground level open space, and a 13,158-square-foot (49-space) surface parking lot. The hotel building was constructed in 1970 and currently has 342 guest rooms. The building operated as a hotel from approximately 1970 to 2018 and was closed for renovation at the time of this publication. However, the existing hotel is anticipated to reopen in November 2019, prior to implementation of the proposed project. The existing building consists of two rectilinear volumes with an interior courtyard and is a mix of modern and New Formalism styles. The building extends to the property line on most street frontages but is set back from the North Point Street and Columbus Avenue frontages.

The main vehicular and pedestrian entrance to the existing hotel is oriented towards Columbus Avenue and there is a porte cochère at the southwest corner of the lot, accessed via a driveway entrance along Columbus Avenue and one driveway exit along North Point Street. The porte cochère area includes approximately 36 feet of off-street passenger loading and 50 feet of off-street commercial loading space, as well as two designated off-street commercial loading spaces. Vehicle and pedestrian access to the project site is currently along Columbus Avenue, North Point Street, Beach Street, Jones Street, and Leavenworth Street. Vehicle access to the basement garage is via ingress from Columbus Avenue and egress to North Point Street. A total of 220 off-street vehicle parking spaces are distributed throughout the basement garage and surface lot and no bicycle parking is provided. A 7,143-square-foot alley is located on the northern edge of the project site, connecting Beach and Jones streets, and serves as the location for two off-street freight loading/unloading zones. In addition, a total of 20 existing street trees are currently located on the Leavenworth, North Point, and Jones street frontages. Remaining vegetation on the site itself consists of ornamental shrubs and landscaping within internal courtyards.

See **Figure 3, Existing Site Conditions,** p. 9, for the current layout of existing site improvements.

Project Characteristics

The proposed project would result in an 87,620-square-foot expansion of the existing hotel building with development of a new, four-story (approximately 40-foot-tall, excluding 16-foot-tall elevator tower) hotel wing[3] along North Point Street and Columbus Avenue, connected to the existing hotel and located primarily within the footprint of the existing onsite surface parking lot (see **Figure 4, Proposed Site Plan**, p. 10 and **Figure 5, Building Height Diagram**, p. 11). The new structure would consist of an additional 79,520 square feet of hotel uses, including 174 guestrooms, 8,100 square feet of ground-level retail, a 2,400-square-foot roof deck, and 290 square feet of ground level open space. The roof would contain separate structures above 40 feet that may be visible from the public right-of-way. A 16-foot-tall elevator penthouse would extend above the roofline and would be located in the middle of the project site. In total, the proposed project would result in a 336,970-square-foot building, with 328,870 square feet of hotel uses in the basement through fifth levels, 8,100 square feet of ground floor retail, 8,250 square feet of private ground level open space, and 2,400 square feet of private rooftop open space. The hotel capacity would be increased from 342 guest rooms to a total of to 516 guest rooms. In addition, the project would result in an increase of 43 employees (20 hotel service employees and 23 retail employees) on the site.[4]

See **Figures 6 through 9**, pp. 12-15, for the proposed basement through fifth level floor plans and **Figure 10**, p. 16, for the proposed roof plan. See **Figures 11 and 12**, pp. 17-18, for the proposed building elevations and building sections, respectively. **Table 1, Proposed Project Summary,** provides a summary of the proposed improvements, compared to existing conditions.

Table 1: Proposed Project Summary

Use	Existing	Net New	Total
Hotel (square feet)	249,350	79,520	328,870
Retail (square feet)	0	8,100	8,100
Height (stories, feet)	5-story, 40 feet	4-story, 40 feet	5-story, 40 feet
Rooms	342	174	516
Private open space (square feet)	7,960	290	8,250
Roof deck (square feet)	0	2,400	2,400
Off-street vehicle parking spaces	220	-54	166
Bicycle parking (*class 1*)	0	18	18
Bicycle parking (*class 2*)	0	20	20

Source: CFW 55 Owner, LLC, 1300 Columbus Avenue Application for Planned Unit Development, September 12, 2019.

To accommodate the proposed expansion, the project would include demolition of the existing two-story hotel entry wing located near Columbus Avenue and North Point Street, removal of the 49-space surface parking lot and existing swimming pool, removal of some exterior walls to connect the existing and

[3] The hotel wing addition, as measured to the roofline from the midpoint along the Columbus Avenue street frontage would be 39 feet, 5 inches tall and the tallest point of the addition as measured from grade at North Point Street would be 44 feet, 11 inches.

[4] Total retail employment is calculated using an employee density factor of one employee per 350 square feet.

proposed new hotel wing, and the addition of a new 16-foot-tall elevator tower. Exterior building materials would consist of metal panels, and smooth cement plaster and brick finishes. The project also proposes minor modifications to the below-grade basement parking garage to remove a total of five existing parking spaces and to add two new elevators and new structural footings to support the four-story addition above.

A 2,400-square-foot roof deck above the fifth floor on the north corner of the existing hotel is also proposed. The roof deck would primarily provide open space amenities for hotel guests and may also be used for private events, but would not be open to the general public. A 6-foot-tall glass windscreen would be placed on the northern, western, and eastern perimeter of the roof deck to reduce potential noise levels. Events and amplified music on the roof deck would not be allowed after 12 a.m. and would be required to meet the City's noise ordinance standards (police code section 2909(b)).

Overall, the proposed project would result in the removal of 54 existing off-street parking spaces, including 49 surface parking spaces and five basement garage spaces; a total of 166 off-street parking spaces in the basement garage would be provided on the project site at project completion. Eighteen *class 1* bicycle spaces would be provided in a bike room on the ground floor and 20 *class 2* bicycle parking spaces would be provided along Leavenworth Street.[5]

Vehicle access to the existing basement garage would be maintained with the existing ingress and egress. In addition, the existing porte cochère would be renovated to include approximately three spaces of off-street hotel passenger pick-up and drop-off, which would replace the existing off-street passenger and loading zones and commercial loading spaces.

The existing hotel contains two off-street freight loading/unloading docks accessed from the rear alley intersecting Beach Street. These loading docks would remain; however, there would be restricted access limited to commercial loading from Beach Street with "Authorized Vehicles Only" signage to limit access to the west half of the alley. Commercial loading vehicles would reverse into the alley for loading, and exit onto Beach Street. Changes to the existing alley would include the installation of a fixed, decorative fence and a three-part, telescopic gate at the Beach Street alley entrance, which would close after freight vehicles have entered the alley for loading activity. A 6-foot curb extension (bulb-out) would be added at the corner of Leavenworth Street and Columbus Avenue.

The project sponsor would also request the SFMTA to approve the reconfiguration of on-street metered parking and on-street tour bus parking and loading zones (white curb) along North Point Street, Columbus Avenue, and Leavenworth Street to accommodate new on-street passenger loading zones (see **Figure 4**, p. 10). Existing on-street tour bus loading zones are provided on North Point Street (three spaces), Columbus Avenue (one space), and Jones Street (two spaces). As part of the proposed project, the project sponsor would request SFMTA to convert the existing 110 feet of on-street tour bus parking along North Point Street to 66 feet of 5-minute passenger loading zone and 99 feet of 20-minute tour bus loading zone. The existing

[5] *Class 1* bicycle parking spaces are spaces in secure, weather-protected facilities intended for use as long-term, overnight, and work-day bicycle storage. *Class 2* bicycle parking spaces are spaces located in a publicly accessible, highly visible location intended for transient or short-term use. Each *class 2* rack serves two bicycles.

75 feet of on-street tour bus loading zone along Columbus Avenue would be replaced with one 24-foot and one 43-foot-long 5-minute passenger loading zone on either side of the project's entrance driveway.

The proposed project does not involve the removal of any existing trees. The project would retain the 20 existing street trees surrounding the project site and would install six new street trees on Beach, North Point, and Jones streets and Columbus Avenue, for a total of 26 street trees on the surrounding street frontages with project development.

Project Construction

Construction of the proposed project would occur over an approximately 16-month period and would consist of the following partially overlapping phases: (1) demolition and pile drilling; (2) excavation and shoring; (3) foundation and below-grade construction; (4) base building installation; (5) exterior finishing; and (6) interior finishing. The foundation would be installed primarily via auger cast-in-place piles and torque-down piles, with use of micropiles where access is limited. The micropiles would support the column/footing bases that would be installed throughout the existing basement garage in several dozen locations. A new post tension slab would hover approximately 8 to 10 inches over the existing slab. The new slab would be designed to support the new load and the existing slab would provide form support during installation of the new slab and then would function as a non-support ceiling only.

No impact or vibratory pile driving techniques would be used. The proposed project would require excavation of approximately 820 cubic yards to a depth of 6 feet below the existing basement to accommodate foundations. Pile installation would require soil disturbance to a depth of approximately 70 feet below the basement slab.

Project Approvals

The proposed project would require the following approvals:

Planning Commission

- Conditional Use Authorization for hotel use (section 303 of the planning code)
- Planned Unit Development to permit minor deviation from measurement of height (section 260 of the planning code)[6]

San Francisco Department of Building Inspection

- Site/building permit

[6] Measured from the midpoint of the curb on Beach Street, the addition would be 39 feet, 5 inches in height. A small portion of the addition exceeds the 40-foot height limit as measured under Planning Code section 260, so a Planned Unit Development permit is sought for minor modification from the method of measuring height. Measured from the lowest point of grade on North Point Street, the portion of the addition for which the PUD modification is sought is 44 feet, 11 inches (see **Figure 5**, p. 11).

San Francisco Recreation and Park Commission

- Review and comment to the planning commission upon the proposed project.

San Francisco Municipal Transportation Agency

- Approval of Color Curb changes (including tour bus loading)
- Approval of a street space permit for construction (if sidewalks are used for construction staging and walkways are constructed in the curb lane).

Approval Action: Approval of the Conditional Use Authorization and a Planned Unit Development and expansion of a hotel use by the planning commission would constitute the Approval Action for the proposed project. The Approval Action date establishes the start of the 30-day period for the appeal of the Final Mitigated Negative Declaration to the board of supervisors pursuant to section 31.04(h) of the San Francisco Administrative Code.

B. PROJECT SETTING

The topography of the project site and vicinity is generally level. Land uses in the surrounding area include a mixture of hotel, commercial, residential, and retail uses, including shopping and restaurants. Within the block occupied by the project site is a three-story commercial building (505 Beach Street) and a four-story commercial building (555 Beach Street) located immediately to the north of the property line and onsite alley. The 505 Beach Street building, located approximately 35 feet northeast from the project site, is occupied by the Pacific Vision Institute, an eye surgery facility.

Land uses within the immediate vicinity of the project site include a three-story mixed-use residential building (2801 Leavenworth Street), a four-story hotel (Courtyard by Marriott Fisherman's Wharf), and three-story parking garage across Beach Street to the north; a four-story hotel (Holiday Inn Fisherman's Wharf) across Jones Street to the east; a four-story hotel (Marriott Fisherman's Wharf) and a four-story mixed-use residential building (1255 Columbus Avenue) across North Point Street to the south; a three-story mixed use residential building (2701 Leavenworth Street) and four-story residential building (1321 Columbus Avenue) to the southwest across Columbus Avenue, and the Joseph Conrad Mini Park to the west across Leavenworth Street. The site is located approximately three blocks north of Fay Park, two blocks northeast of Russian Hill Park, and two blocks east of Aquatic Park, as shown in **Figure 2**, p. 8.

Regional access to the site is provided by Interstate 80 (I-80), US Highway 101, and I-280, each located approximately 1.85 miles southwest, 0.5 miles west, and 2.5 miles southeast of the project site, respectively. Local transit service is provided by San Francisco Municipal Railway (Muni) lines, which provide access to regional transit operators (e.g., Bay Area Rapid Transit [BART], AC Transit). There are eight Muni transit routes within the immediate vicinity of the project site (19-Polk, 30-Stockton, 47-Van Ness, E-Embarcadero, F-Market and Wharves, PH-Powell/Hyde Cable Car, PM-Powell/Mason Cable Car, and 39-Coit). Line F, which is 0.2 miles north of the project site, has a stop on Market Street and Main Street.

The project site is located within the C-2 (Community Business Use District) zoning district and the Waterfront Special Use District (SUD) No. 2. It is also within the 40-X Height and Bulk District. The C-2 district encompasses most of the properties north of Bay Street (one block south of North Point Street), while properties south of Bay Street are located in the Medium Density Mixed Residential (RM-3) and North Beach Neighborhood Commercial (NCD) Use Districts.

Cumulative Setting

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

The cumulative context for land use development project effects is typically localized, within the immediate vicinity of the project site, or at the neighborhood level. Cumulative development in the project vicinity (within an approximately one-quarter-mile radius of the project site) includes the projects listed in **Table 2**. These projects are either projects for which the planning department has a project application on file or projects that have been entitled but have not yet begun construction. As shown, these projects include new residential, mixed-use, and transportation infrastructure projects.

Table 2: Cumulative Projects in the Vicinity of the Project Site

Address	Planning Department Case No.	Project Description	Project Status
F-Line Fort Mason Extension	N/A	Extension of the F-Line to Fort Mason via Beach Street.	Grant application submitted
Jefferson Street Improvement Project, Phase II	N/A	Extend streetscape improvements already in place from Hyde to Jones, all the way to Powell. Road diet: Jones to Powell.	Under public works department review
888 North Point Street	2014-0030088ENV	Demolish 9,523-square-foot commercial building portion and parking lot on the western side of the lot (3000 Larkin/898 North Point). Construct four-story-over-basement building containing five residences over 2,554 square feet of ground-floor retail and seven below-grade parking spaces. Construct fire wall to separate the new building from the existing building on the eastern portion of the lot	Building permit issued
400 Bay Street	2019.07992E	Demolish an existing one-story restaurant and build a new four-story, 13-room hotel with a ground floor retail.	Building permit issued

Sources: SF Development Pipeline Map, *http://developmentmap.sfplanning.org/*; Department of Public Works Utility and Paving Map, *https://data.sfgov.org/City-Infrastructure/DPW-Utility-Excavation-and-Paving-Map/6kfu-yacb/data#column-menu*; Fisherman's Wharf Public Realm Plan, *http://archives.sfplanning.org/CDG/CDG_fishermans_wharf.htm#draft_plan*, June 2010.

LEGEND

Project Boundary

FIGURE 1

0 1000 2000

FEET

SOURCE: ESRI World Map (06/19).

1300 Columbus Avenue Project

Project Vicinity Map

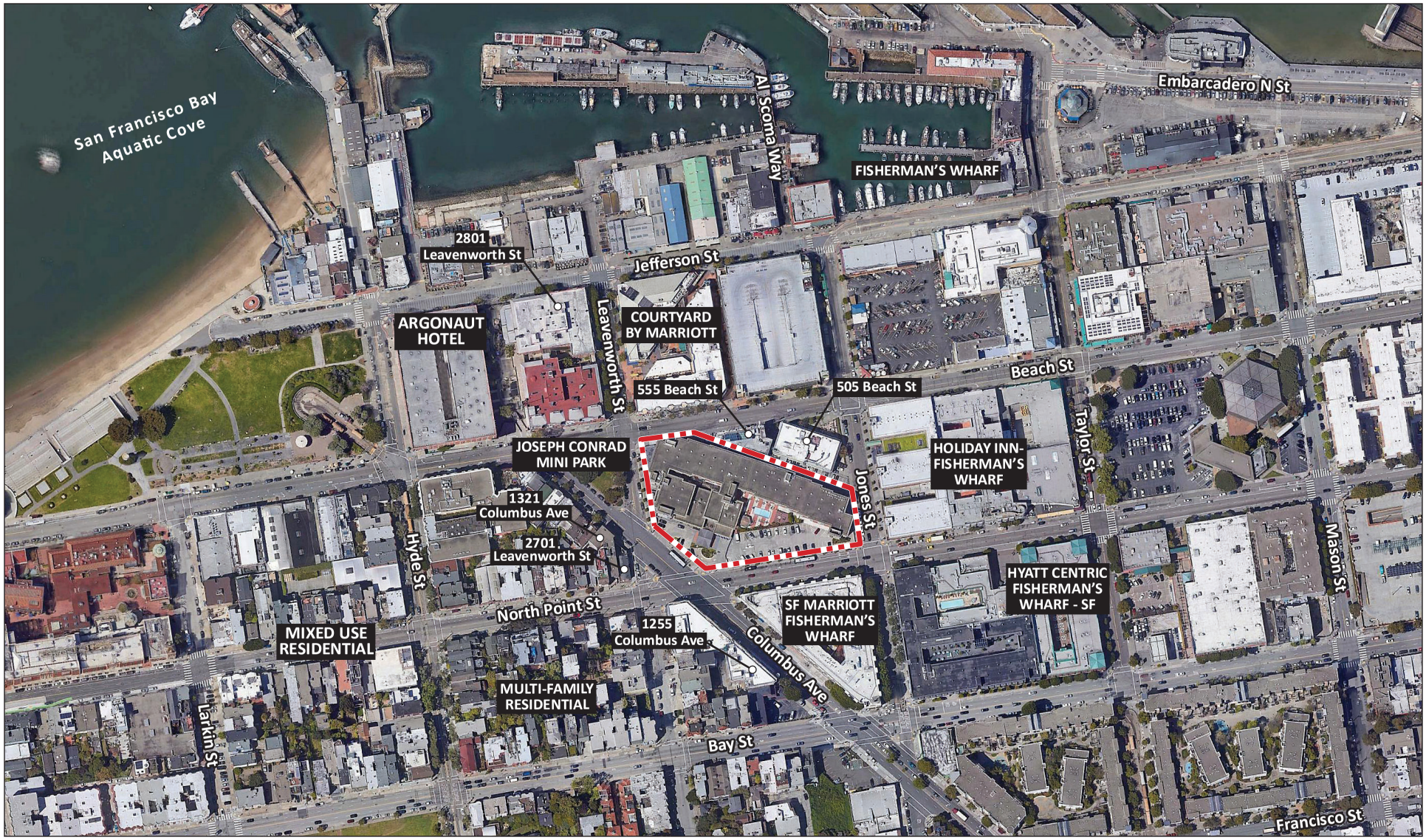
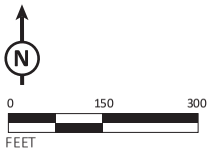


FIGURE 2



Project Boundary

SOURCES: GOOGLE EARTH, 3/26/18; LSA, 2019.

1300 Columbus Avenue Project

Aerial Photograph of the Project Site and Surrounding Land Uses

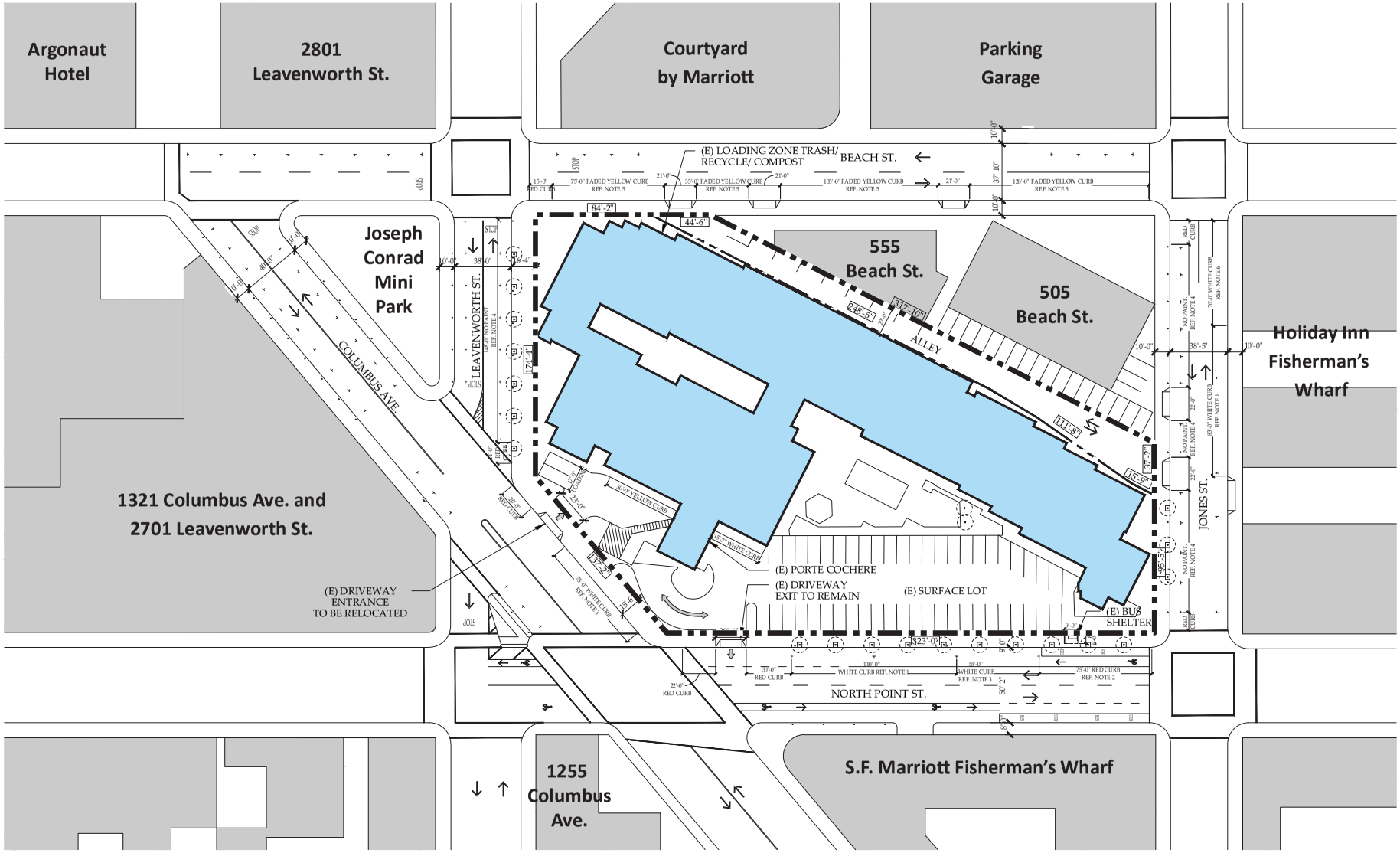


FIGURE 3

0 32 64
FEET

Project Boundary

SOURCE: AXIS/GFA, APRIL 2019.

1300 Columbus Avenue Project
Existing Site Conditions

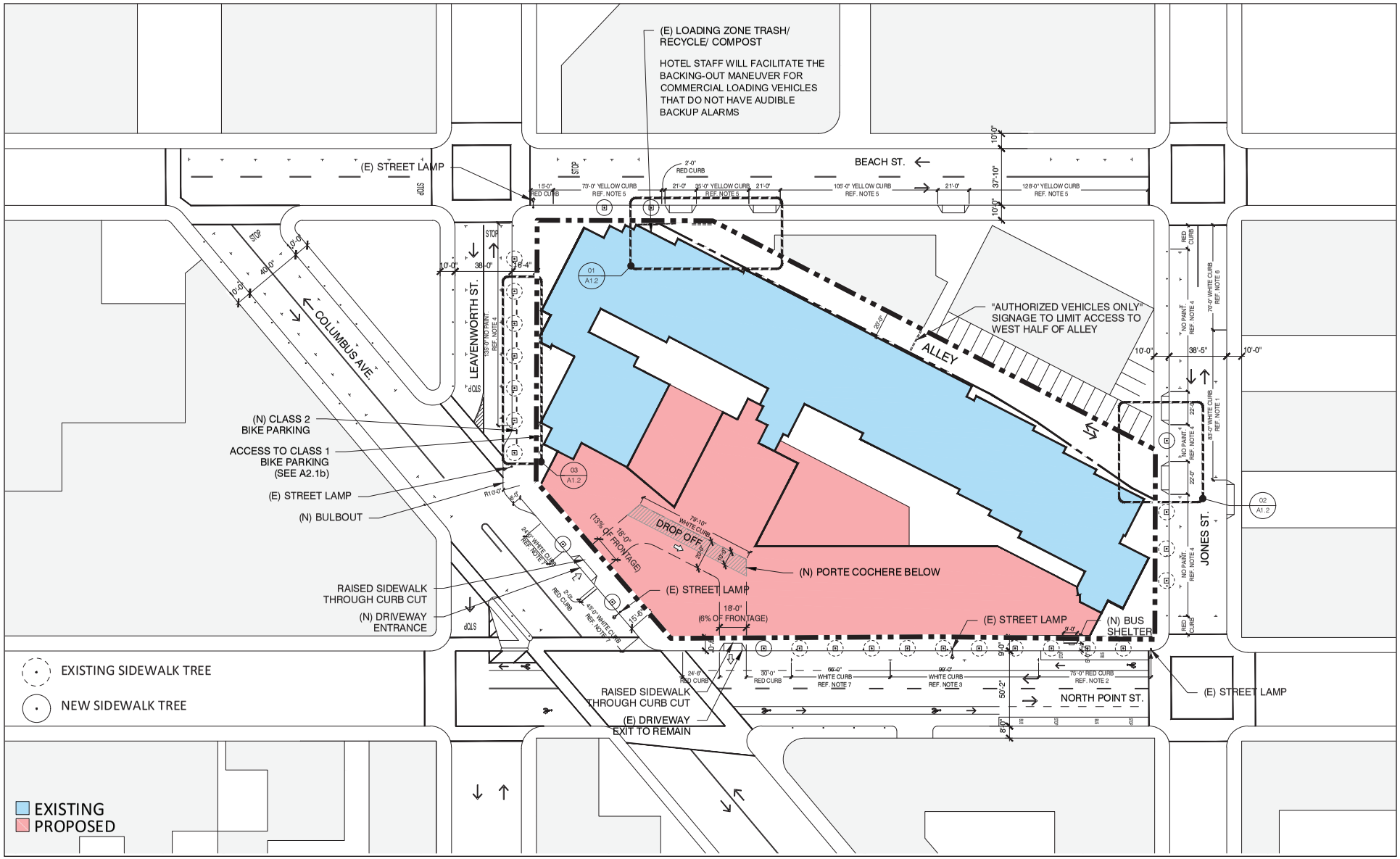


FIGURE 4

0 32 64
FEET

Project Boundary

SOURCE: AXIS/GFA, OCTOBER 28, 2019.

1300 Columbus Avenue Project
Proposed Site Plan

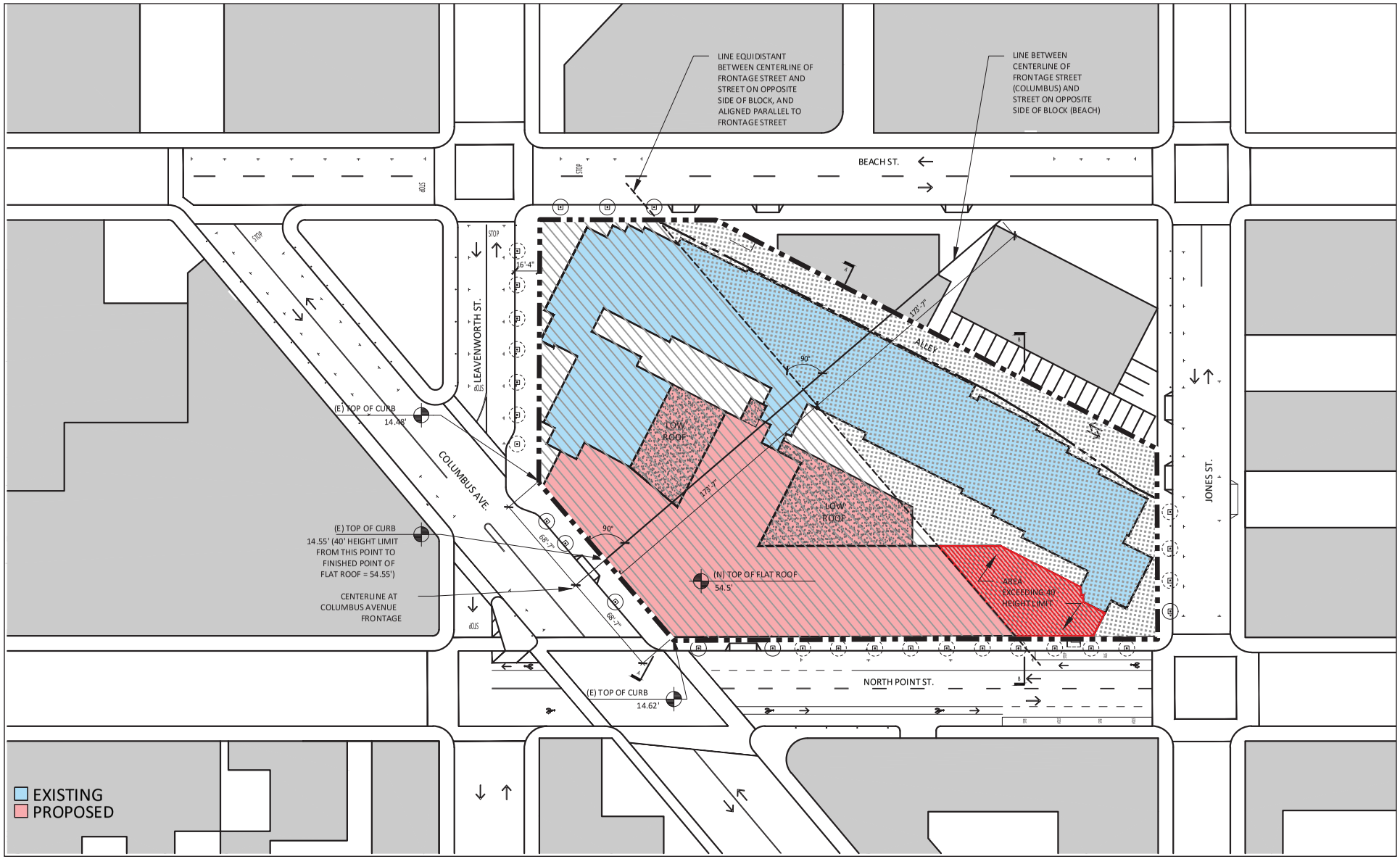


FIGURE 5

0 32 64
FEET

Project Boundary

AREA OF SITE SUBJECT TO UPSLOPE LOT HEIGHT MEASUREMENT

AREA OF SITE SUBJECT TO DOWNSLOPE LOT HEIGHT MEASUREMENT

AREA OF SITE SUBJECT TO UPSLOPE LOT HEIGHT MEASUREMENT (EXCEEDS 40' LIMIT)

SOURCE: AXIS/GFA, SEPTEMBER 30, 2019.

1300 Columbus Avenue Project
Building Height Diagram

FIGURE 6

0 32 64
FEET

Project Boundary

1300 Columbus Avenue Project
Proposed Basement Level Plan

SOURCE: AXIS/GFA, SEPTEMBER 30, 2019.

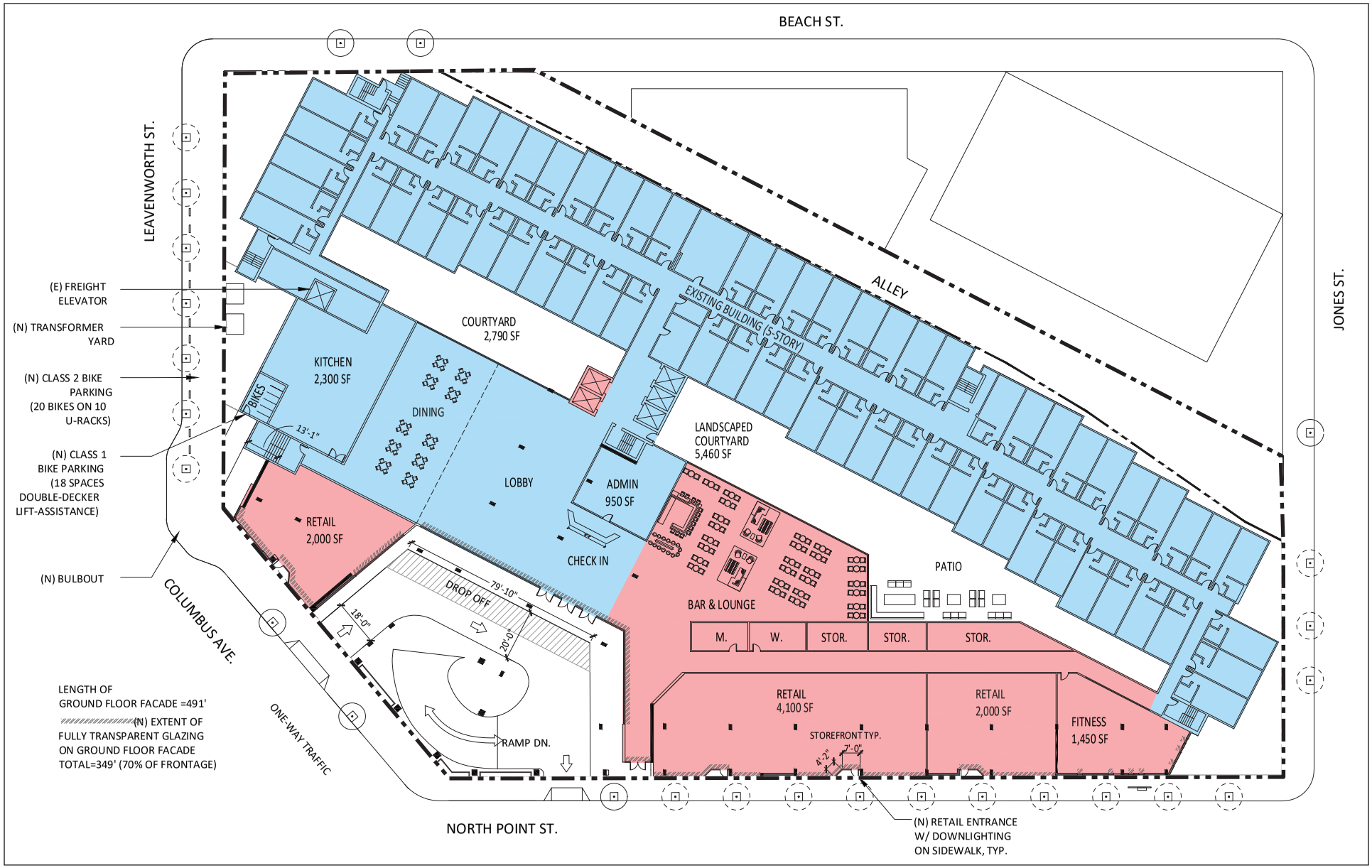


FIGURE 7

0 32 64
FEET

N

Project Boundary

SOURCE: AXIS/GFA, SEPTEMBER 2019.

1300 Columbus Avenue Project
Proposed First Floor Plan

FIGURE 8

0 32 64
FEET

N

Project Boundary

1300 Columbus Avenue Project
Proposed Second Floor Plan

SOURCE: AXIS/GFA, SEPTEMBER 30, 2019.

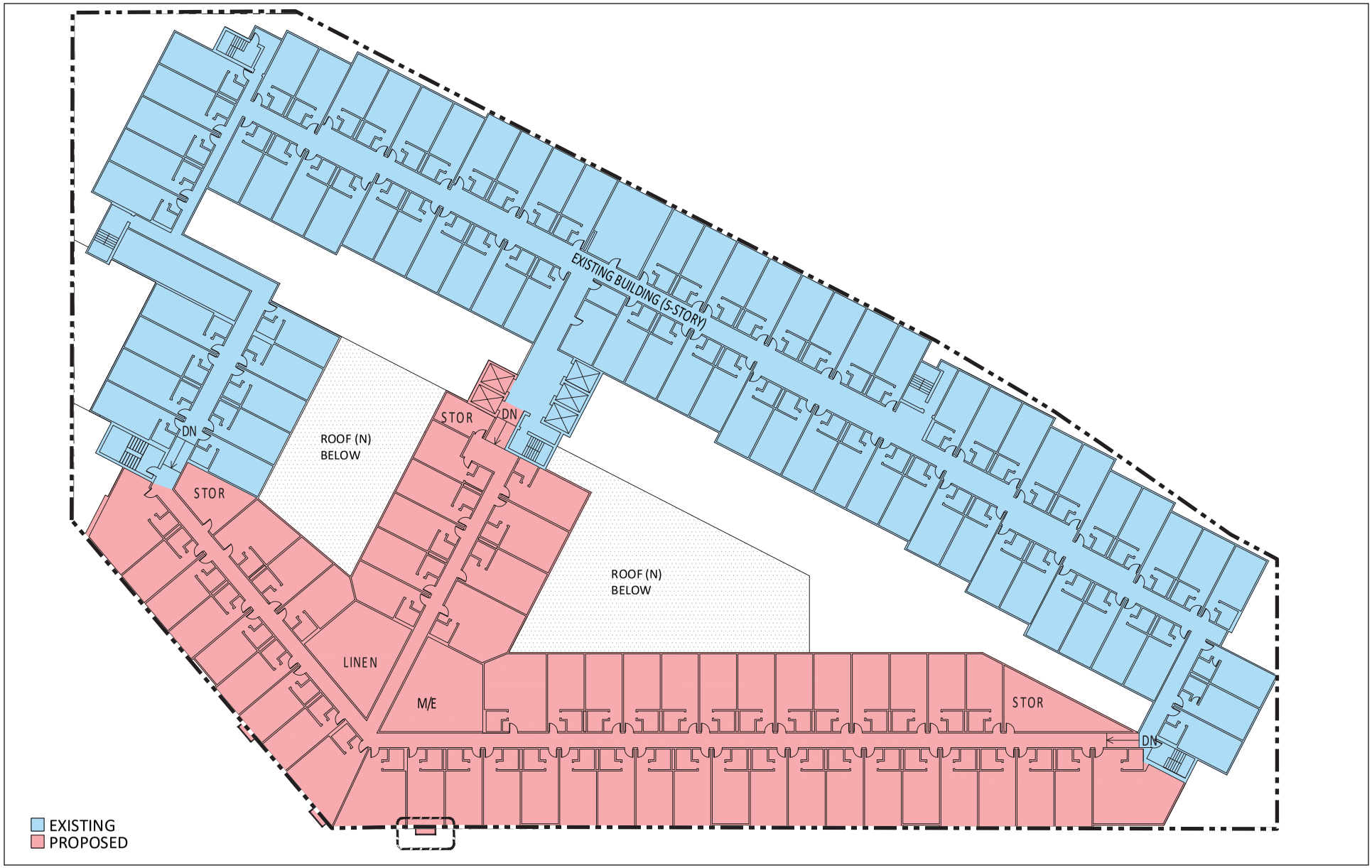


FIGURE 9

0 32 64
FEET

N

Project Boundary

SOURCE: AXIS/GFA, SEPTEMBER 30, 2019.

1300 Columbus Avenue Project
Proposed Third Through Fifth Floor Plan

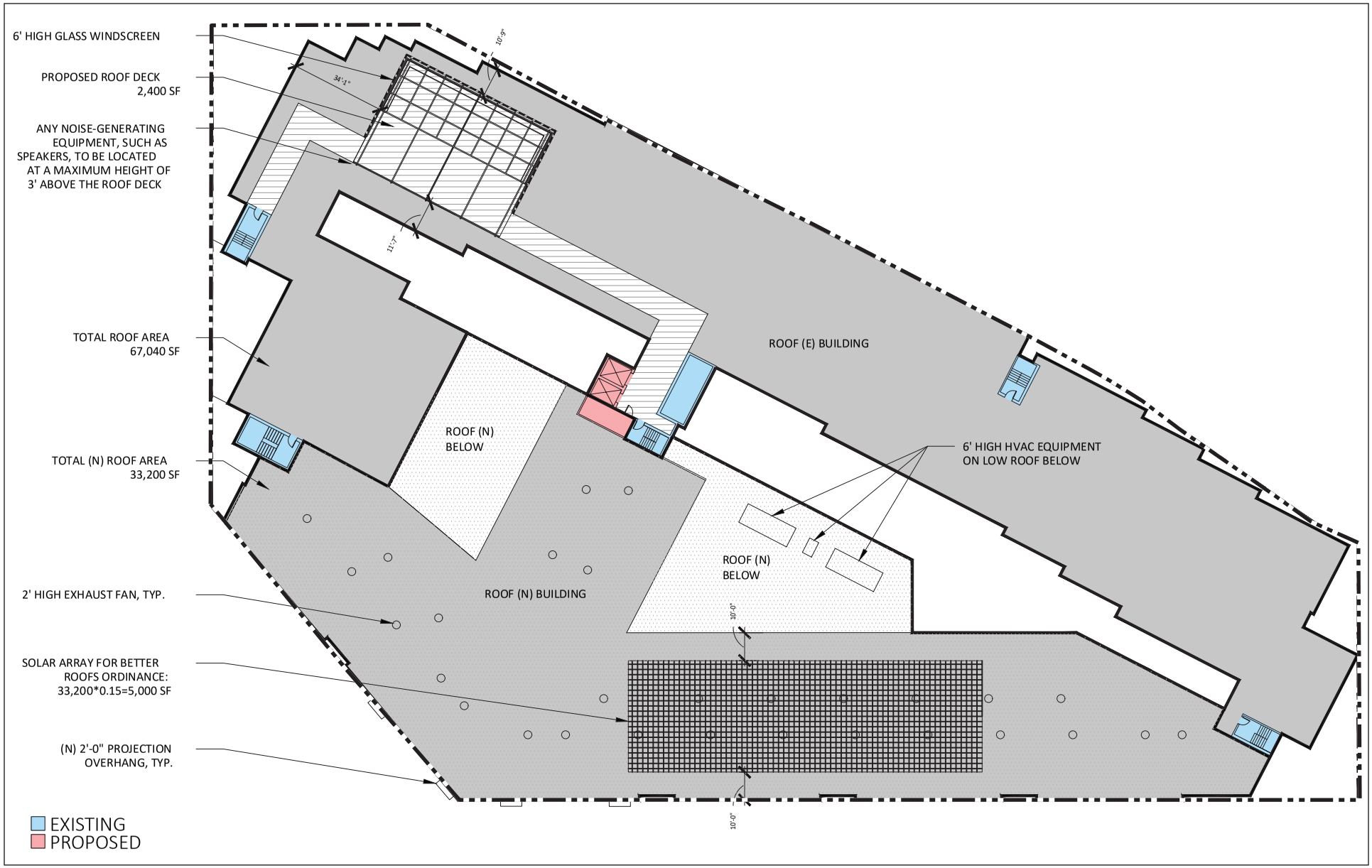


FIGURE 10

0 32 64
FEET

N

Project Boundary

1300 Columbus Avenue Project
Proposed Roof Plan

SOURCE: AXIS/GFA, SEPTEMBER 30, 2019.

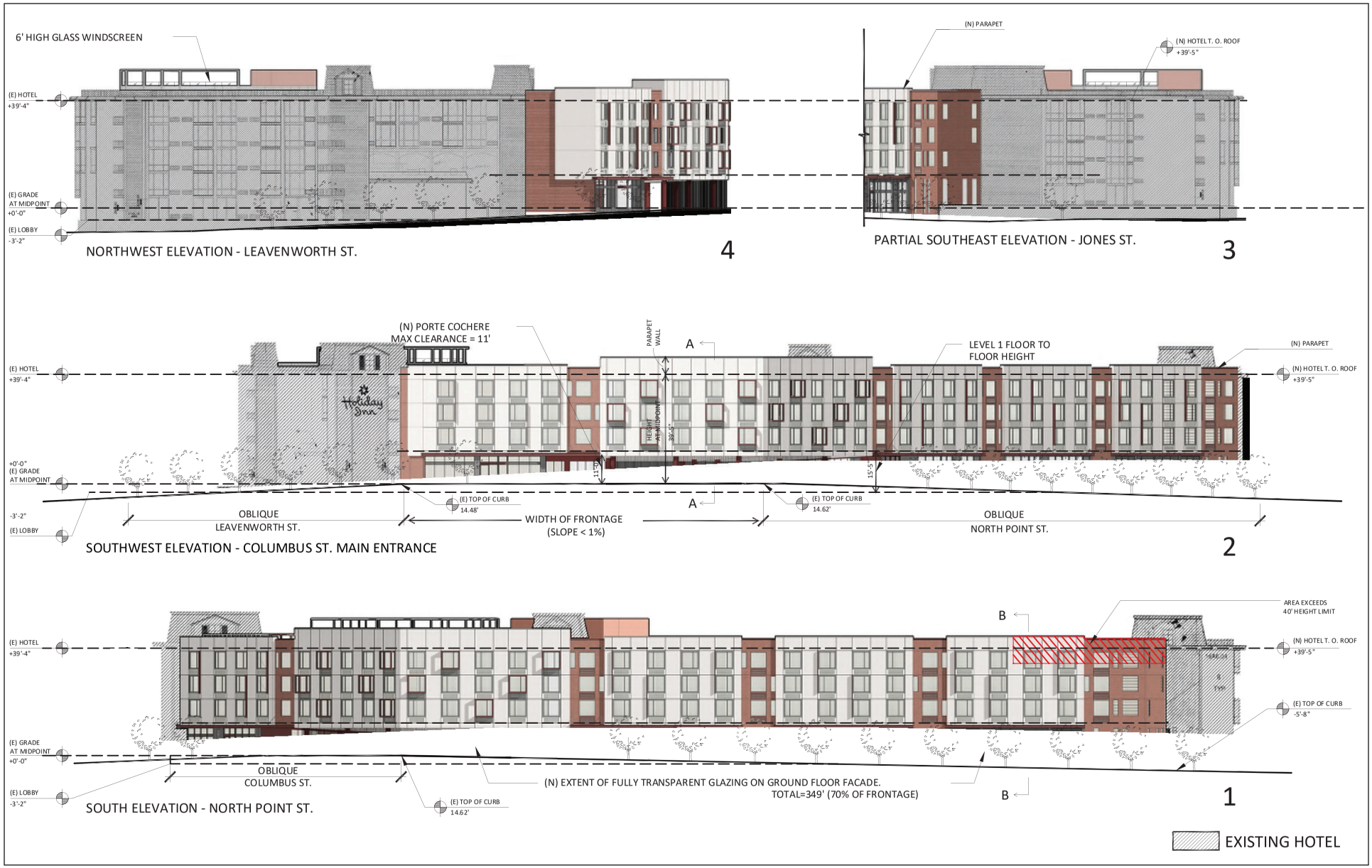


FIGURE 11

NOT TO SCALE

SOURCE: AXIS/GFA, SEPTEMBER 30, 2019.

1300 Columbus Avenue Project
Proposed Building Elevations

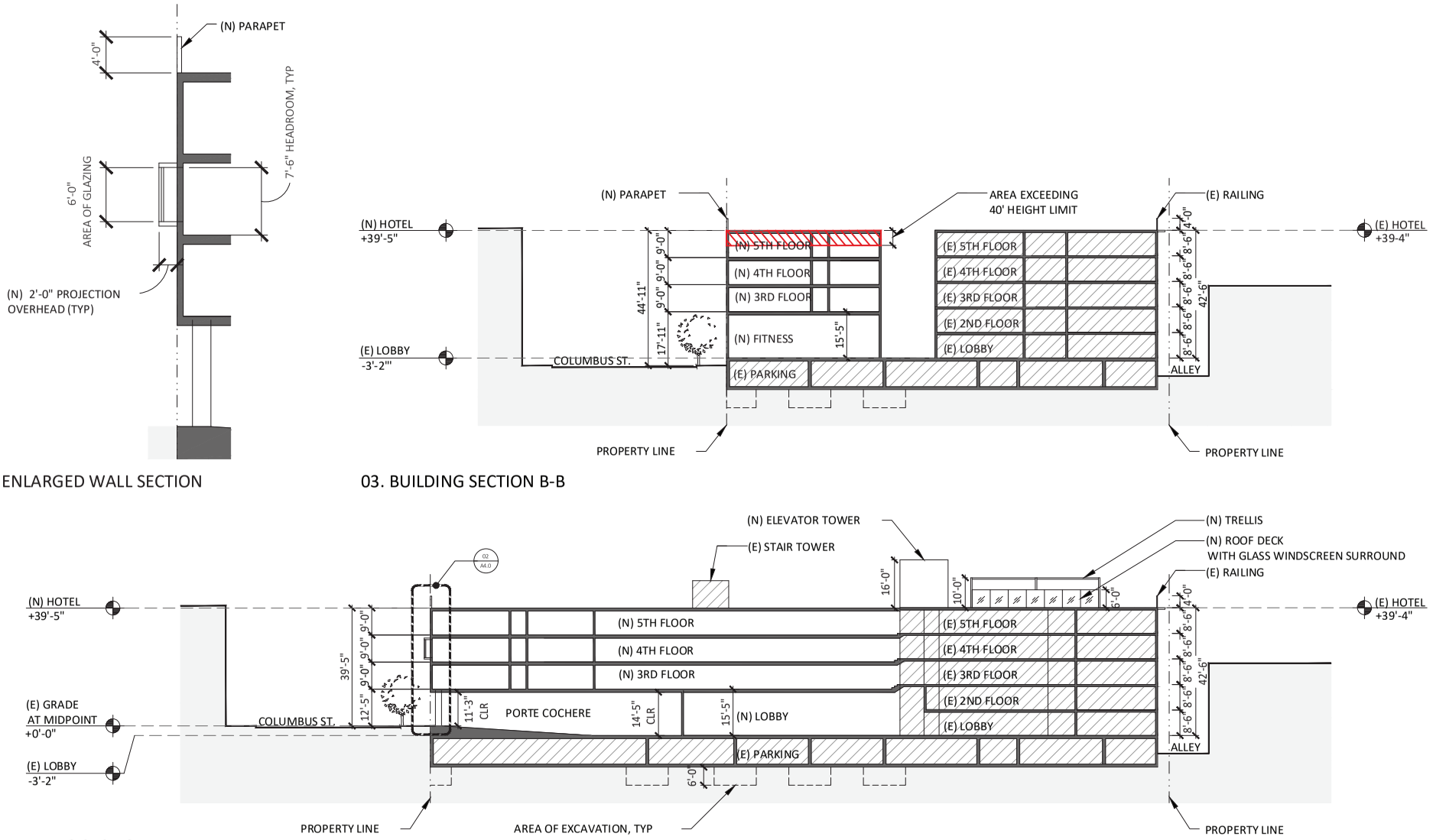


FIGURE 12

NOT TO SCALE

EXISTING
PROPOSED

SOURCE: AXIS/GFA, SEPTEMBER 30, 2019.

1300 Columbus Avenue Project
Proposed Building Sections

C. COMPATIBILITY WITH ZONING AND PLANS

	Applicable	*Not Applicable*
Discuss any variances, special authorizations, or changes proposed to the planning code 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 and Zoning Maps

The San Francisco Planning Code, which incorporates by reference the City and County of San Francisco's (the City's) zoning maps, governs permitted uses, densities, and the configuration of buildings within the city. Permits to construct new buildings (or to alter or demolish existing ones) may not be issued unless: (1) the proposed project complies with the planning code, (2) an allowable exception or variance is granted, or (3) legislative amendments to the planning code are included and adopted as part of the proposed project.

Land Use

The project site is located within the Community Business (C-2) zoning district. According to Planning Code section 210.1, the C-2 zoning district is intended to provide convenience foods and services to residential areas of the city, both in outlying sections and in closer-in, more densely built communities. In addition, some C-2 districts provide comparison shopping goods and services on a general or specialized basis to a citywide or regional market area, complementing the main area for such types of trade in downtown San Francisco. The extent of these districts caries from smaller clusters of stores to larger concentrated areas, including both shopping centers and strip developments along major thoroughfares, and in each case the character and intensity of commercial development are intended to be consistent with the character of other uses in the adjacent areas. The emphasis in C-2 districts is upon compatible retail uses, but the district also allows a wider variety of goods and services to suit the longer-term needs of customers and greater latitude is given for the provision of automobile-oriented uses. Hotel uses are subject to a conditional use authorization in the C-2 district, pursuant to Planning Code table 210.1.

Height and Bulk

The project site is located in a 40-X height and bulk district. The existing hotel on the project site is 40 feet in height. Measured from the midpoint of the curb on Beach Street, the proposed addition would be 39 feet, 5 inches in height. A small portion of the addition exceeds the 40-foot height limit as measured under Planning Code section 260; therefore, a PUD permit is sought for minor modification from the method of measuring height. Measured from the lowest point of grade (approximately 5 feet above mean sea level) on North Point Street, the portion of the addition for which the PUD modification is sought is 44 feet, 11 inches (see **Figure 5**, p. 11). The building would also include an elevator penthouse extending above the

roof slab an additional 16 feet (56 feet in height). Although these additional features would extend above 40 feet, these features are exempt from being measured as part of building height per Planning Code section 260(b). The "X" bulk district does not have bulk limitations for sites at this height district. Thus, the proposed project would comply with the 40-X height and bulk district limits.

Floor Area Ratio

Floor area ratio (FAR) is the ratio of the gross floor area of a building to the area of the lot it occupies. Pursuant to Planning Code section 210.1, the maximum FAR allowed for the Waterfront Special Use District shall be 5-to-1. The current FAR on the project site is 2.04. The total FAR for the completed project would be approximately 3.02. Therefore, the proposed project would comply with the basic FAR allowed within the C-2 district.

Conditional Use

The proposed project is requesting a conditional use authorization (Planning Code section 303) from the planning commission to allow an expansion of hotel uses on the project site. The C-2 district allows for hotel uses with conditional use authorization.

Planned Unit Development

Planning Code section 304(d)(6) allows for minor deviations for measurement of height in sections 260 and 261 through the use of a planned unit development, provided that no such deviations depart from the purposes or intent of those sections. As discussed above under Height and Bulk, an exception from the measurement of height pursuant to Planning Code section 260 is being requested, and therefore a planned unit development from section 304 is being sought as part of this proposed project.

Plans and Policies

San Francisco General Plan

The San Francisco General Plan (general plan) establishes objectives and policies to guide land use decisions related to the physical development of San Francisco. It is comprised of 10 elements, each of which addresses a particular topic that applies citywide: air quality; arts; commerce and industry; community facilities; community safety; environmental protection; housing; recreation and open space; transportation; and urban design. Any conflict between the proposed project and polices that relate to physical environmental issues are discussed in Section E, Evaluation of Environmental Effects. The compatibility of the proposed project with general plan policies that do not relate to physical environmental issues will be considered by decision-makers as part of their decision whether to approve or disapprove the proposed project. The project consists of an expansion of an existing hotel use on the project site and would introduce retail uses in a commercial zoning district; it would not introduce incompatible land uses to the neighborhood. The project would not otherwise conflict with any general plan policies or objectives. Thus, the project would not conflict with the San Francisco General Plan or any other adopted policy.

Proposition M

In November 1986, the voters of San Francisco approved Proposition M, the Accountable Planning Initiative, which added section 101.1 to the planning code and established eight priority policies. These policies, and the topics in Section E, Evaluation of Environmental Effects, that address the environmental issues associated with these policies, are: (1) preservation and enhancement of neighborhood-serving retail uses; (2) protection of neighborhood character; (3) preservation and enhancement of affordable housing (Section E.2(b), Population and Housing, regarding housing supply and displacement issues); (4) discouragement of commuter automobiles (Sections E.5(a) and E.5(b), Transportation and Circulation); (5) protection of industrial and service land uses from commercial office development and enhancement of resident employment and business ownership; (6) maximization of earthquake preparedness (Sections E.15(a) through E.15(d), Geology and Soils); (7) preservation of landmark and historic buildings (Section E.3(a), Cultural Resources); and (8) protection of open space (Section E.9, Wind; Section E.10, Shadow; Section E.13, Public Services; and Section E.11(a), Recreation). Prior to issuing a permit for any project that requires an initial study under CEQA, and prior to 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 or legislation would be consistent with the priority policies.

As noted above, the compatibility of the proposed project with general plan objectives and policies that do not relate to physical environmental issues will be considered by decision-makers as part of their decision 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 proposed project.

Regional Plans and Policies

The four principal regional planning agencies and their overarching policies and plans (noted in parentheses) that guide planning in the nine-county Bay Area include the Bay Area Air Quality Management District (2017 Bay Area Clean Air Plan), the Metropolitan Transportation Commission (Plan Bay Area 2040), the San Francisco Regional Water Quality Control Board (San Francisco Basin Plan), and the San Francisco Bay Conservation and Development Commission (San Francisco Bay Plan). Due to the location, size, and nature of the proposed project, no anticipated conflicts with regional plans and policies would occur.

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

This initial study examines the proposed project to identify potential effects on the environment. The project consists of the expansion of an existing hotel building and associated improvements and, unless otherwise noted, the following analysis focuses on potential impacts that could occur with development of the proposed expansion (increased building footprint and increase in occupancy). Although the hotel building is not currently operational, it is a permitted use and is planned to begin operating again in November 2019, prior to development of the proposed project. Therefore, baseline conditions throughout this analysis assume that the existing hotel building is currently operating. In addition, the analysis below generally considers the net change that would occur with the hotel expansion in comparison to baseline conditions. For example, for most topics, the analysis focuses on impacts related to development of 174 net new hotel rooms. For some topics, such as transportation and shadow, the analysis focuses on the potential impacts that could occur with the completed project, and the whole of the proposed hotel operations, as this approach provides a more comprehensive assessment of impacts.

For each item on the initial study checklist, the evaluation has considered the impacts of the proposed project both individually and cumulatively. All items on the initial study checklist that have been checked "Less than Significant with Mitigation Incorporated," "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. 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 "No Impact" or "Not Applicable" without discussion, the conclusions regarding potential significant adverse environmental effects are based upon field observation, staff experience and expertise on similar projects, and/or standard reference material available within the planning department, such as the department's Transportation Impact Analysis Guidelines for Environmental Review, or the California Natural Diversity Database 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. The items checked above have been determined to the "Less than Significant with Mitigation Incorporated."

Public Resources Code Section 21099

Aesthetics and Parking

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

1. The project is in a transit priority area; and

2. The project is on an infill site; and

3. The project is residential, mixed-use residential, or an employment center.

The proposed project meets the above criteria (the hotel use is considered residential use); therefore, this initial study does not consider aesthetics and the adequacy of parking in determining the significance of project impacts under CEQA.[7]

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 as addressed by the revised public resources code do not include impacts on historical or cultural resources. Thus, there is no change in the planning department's methodology related to design and historic review.

E. EVALUATION OF ENVIRONMENTAL EFFECTS

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

[7] San Francisco Planning Department, *Transit-oriented Infill Project Eligibility Checklist for 1300 Columbus Avenue,* March 5, 2019. This document (and all documents cited in this Preliminary Mitigated Negative Declaration unless otherwise noted) is available for review on the San Francisco Property Information Map, which can be accessed at *http://sfplanninggis.org/PIM/*?. Individual files can be viewed by clicking on the Planning Applications link, clicking on the "More Details" link under the project's environmental case number (2017-005154ENV), and clicking on the "Related Documents" link.

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

The division of an established community would involve the construction of a physical barrier to neighborhood access, such as a new freeway, or the removal of a means of access, such as a bridge or a roadway. Implementation of the proposed project would not result in the construction of a physical barrier to neighborhood access or the removal of an existing means of access; the proposed project would include the addition of an approximately 87,620-square-foot, four-story hotel wing with 174 new guestrooms and 8,100 square feet of ground-level retail space to the existing hotel on the project site. The proposed uses are similar to the mix of existing uses on the project site and within the project vicinity.

The proposed project would not alter the established street grid or permanently close any streets or sidewalks. Although there would be temporary partial sidewalks closures along the frontages on North Point Street, Columbus Avenue, and Leavenworth Street during project construction, these closures would be temporary in nature, and pedestrian travel would be accommodated via a covered walkway or sidewalks on adjacent streets. Therefore, the proposed project would not physically divide an established community and this impact would be less than significant.

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

Land use impacts would be considered significant if the proposed project would conflict with any plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Environmental plans and policies are those, like the Bay Area Air Quality Management District's (air district's) 2017 Clean Air Plan, which directly address environmental issues and/or contain targets or standards that must be met in order to preserve or improve characteristics of the City's physical environment. The proposed project would consist of an addition to an existing hotel on an urban infill site; the addition would be constructed within the existing lot and would be of a similar size and scale as existing uses on and within the vicinity of the site. The proposed project would not obviously conflict with any applicable land use plan, policy, or regulation such that an adverse physical change would result (see Section C, Compatibility with Zoning and Plans).

The proposed project would not conflict with any adopted environmental plan or policy, including the air district's 2017 Clean Air Plan, the City's Strategies to Address Greenhouse Gas Emissions (GHG Reduction Strategy), and the City's Urban Forestry Ordinance, as discussed in Section E.6, Air Quality, Section E.7, Greenhouse Gas Emissions, 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.

Impact C-LU-1: The proposed project, in combination with past, present, and reasonably foreseeable future projects in the project vicinity, would not result in a cumulative land use impact. (Less than Significant)

The cumulative context for land use effects is typically localized, within the immediate vicinity of the project site, or at the neighborhood level. **Table 2**, p. 6, identifies development projects within a one-quarter-mile radius of the project site. There are no other known future or pipeline development projects

within a one-quarter-mile of the project site. The proposed project, in combination with these nearby cumulative development projects, would not physically divide an established community by constructing a physical barrier to neighborhood access or removing a means of access. None of the nearby cumulative development projects would obviously or substantially conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. The nearby cumulative development projects would introduce new residential, retail, office, restaurant, institutional, and hotel uses to the project vicinity. All of these uses currently exist in the project vicinity. The proposed project, as well as nearby cumulative development projects, would not introduce any incompatible uses, such as industrial uses. For these reasons, the proposed project would not combine with past, present, and reasonably foreseeable future projects to create a significant cumulative land use impact.

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

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

In general, a project would be considered growth inducing if its implementation were to result in a substantial population increase or new development that might not occur without the project. The proposed project would result in an 87,620-square-foot expansion of the existing hotel building with development of a new, four-story hotel wing connected to the existing hotel including the addition of 174 new guestrooms, 8,100 square feet of ground-level retail, a 2,400-square-foot roof deck, and 290 square feet of new ground-level open space uses. The proposed project would also result in an increase of 43 employees (20 hotel service employees and 23 retail employees),[8] on the site, and would contribute to the anticipated population growth in both the neighborhood and citywide context through associated commercial activity from additional visitors.

[8] The planning department uses an employee density factor of one retail employee per 350 gross square feet to estimate the amount of potential employees. San Francisco Planning Department, Citywide Division, Information & Analysis Group.

The 2010 U.S. Census reported a population of 805,235 persons in the City and County of San Francisco and a population of 3,967 persons in Census Tract 101, which includes the project site and its immediate vicinity.[9] The proposed project would not include any new onsite dwelling units, thus the project would not increase the permanent population at the project site. Further, implementation of the proposed project would not directly induce substantial population growth in the project vicinity that would cause an adverse physical change to the environment because the project would not generate a substantial demand for more housing. The proposed project would not indirectly induce substantial population growth in the project vicinity, because it would not involve any changes to roads, utilities, or other infrastructure.

The proposed project would introduce additional commercial/hotel activity and approximately 43 additional hotel and retail employees to the project site. San Francisco's overall employment is projected to increase by approximately 190,780, from about 568,720 employees in 2010 to approximately 759,500 in 2040.[10] Even if all of the 43 new employees associated with the proposed project were conservatively assumed to be new to San Francisco, the project-related employment growth would represent considerably less than 1 percent of the City's estimated employment growth between the years 2010 and 2040. For these reasons, implementation of the proposed project would not induce substantial growth or concentration of employment that would cause a substantial adverse physical change to the environment.

In summary, any potential project-related population increases would be less than significant in relation to the existing number of residents and employees in the project vicinity and to the expected increases in the residential and employment populations of San Francisco. The proposed project would not directly or indirectly induce substantial population growth or concentration of employment in the project vicinity or citywide such that an adverse physical change to the environment would occur. This impact would be less than significant.

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

The proposed project would not displace any residents or housing units, since no residential uses or housing units currently exist on the project site. As noted above, the proposed project would result in an 87,620-square-foot expansion of the existing hotel building with development of a new, four-story hotel wing connected to the existing hotel and the addition of 174 new guestrooms, 8,100 square feet of ground-level retail, a 2,400-square-foot roof deck, and 290 square feet of new open space uses. An estimated 43 hotel and retail jobs would be created with the uses under the proposed project. The hotel expansion and associated retail employment would not likely attract a substantial number of new employees that would move to San Francisco. Therefore, it can be anticipated that most of the employees would live in San Francisco (or nearby communities), and that the project would thus not generate substantial demand for new housing for the potential new employees. Also, the project would not create a substantial demand for new housing elsewhere, because the project would not create a substantial number of new jobs related to the proposed uses on the project site. Therefore, the proposed project would have a less-than-significant

[9] United States Census Bureau, American FactFinder, Profile of General Population and Housing Characteristics: 2010, 2010 Demographic Profile Data, *https://factfinder.census.gov/faces/nav/jsf/pages/index.xhtml*, accessed July 2019.

[10] Association of Bay Area Governments (ABAG), *Projections 2013,* pg. 75.

impact related to the displacement of housing, displacement of people, or the creation of a demand for additional housing elsewhere.

Impact C-PH-1: The proposed project, in combination with past, present, and reasonably foreseeable future projects, would not induce substantial population growth or displace substantial numbers of people or housing units. (Less than Significant)

The cumulative context for the population and housing topic is the City and County of San Francisco. The proposed project would provide housing units and commercial space that would result in increases in population (households and jobs). San Francisco is anticipated to grow by 137,800 households and 295,700 jobs between 2010 and 2040. Between 2010[11] and 2018,[12] San Francisco's population grew by 51,739 households and 183,287 jobs, leaving approximately 86,061 households and 112,413 jobs projected for San Francisco through 2040. As of the fourth quarter of 2018, approximately 70,960 net new housing units are in the pipeline, i.e., are either under construction, have building permits approved or filed, or applications filed, including remaining phases of major multi-phased projects.[13] Conservatively assuming that every housing unit in the pipeline is developed and at 100 percent occupancy (no vacancies), the pipeline would accommodate an additional 70,960 households. The pipeline also includes projects with land uses that would result in an estimated 94,600 new employees and includes the proposed project.[14,15] As such, cumulative household and employment growth is below the Association of Bay Area Governments (ABAG) projections for planned growth in San Francisco. Therefore, the proposed project in combination with citywide development would not result in significant cumulative environmental effects associated with inducing unplanned population growth or displacing substantial numbers of people or housing, necessitating the construction of replacement housing elsewhere.

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[11] Bay Area Census, San Francisco City and County, *http://www.bayareacensus.ca.gov/counties/SanFranciscoCounty.htm,* accessed April 17, 2019.

[12] United States Census Bureau, *QuickFacts San Francisco County, California, https://www.census.gov/Quickfacts/fact/table/sanfranciscocountycalifornia#,* accessed April 17, 2019.

[13] San Francisco Planning Department, 2018 Q4. Housing Development Pipeline, *https://sfplanning.org/project/pipeline-report*, accessed April 10, 2019.

[14] Ibid.

[15] Edmundson, Scott, Information and Analysis Group, San Francisco Planning Department, Citywide Division, March 19, 2019.

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

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

Pursuant to CEQA Guidelines sections 15064.5(a)(1) and 15064.5(a)(2), historical resources are buildings or structures that are listed, or are eligible for listing, in the California Register of Historical Resources (California register) or are identified in a local register of historical resources, such as articles 10 and 11 of the planning code. The significance of a historical resource is materially impaired when a project "demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance."

In evaluating whether the proposed project would cause a substantial adverse change in the significance of a historical resource, the planning department must first determine whether the existing building on the project site is a historical resource. A property may be considered a historical resource if it meets any of the California register criteria related to (1) events, (2) persons, (3) architecture, or (4) information potential, that make it eligible for listing in the California register, or if it is considered a contributor to a potential historic district.

The existing hotel building was constructed in approximately 1970, with approximately 343 rooms (one additional room compared to existing conditions), a 200-space underground parking garage, and a surface parking lot. Few alterations have been made to the original building exterior which exhibits a Mansard design with Modern and New Formalism influences. The building has always operated as a hotel. As the proposed project would involve alteration of a property over 45 years old, a *historic resource evaluation* was prepared[16] and reviewed by the department in a subsequent Preservation Team Review form.[17] Based on the information provided in the evaluation, the department finds that the subject property does not appear

[16] JRP Historical Consulting, LLC, *Historic Resource Evaluation, 1300 Columbus Avenue Project*, San Francisco, California, February 2018.

[17] San Francisco Planning Department, *Preservation Team Review Form 1300 Columbus Avenue*, Michelle Taylor, Preservation Planner. April 23, 2018.

to be eligible for inclusion on the California register as an individual resource or as a contributor to a historic district. This conclusion is based on the following information, which is summarized from the historic resource evaluation and Preservation Team Review form.

The project site, 1300 Columbus Avenue, is not associated with any significant events found to be sufficiently important. Therefore, the property is not eligible for listing in the California register under Criterion 1 (Events). Moreover, the subject building was not associated with the lives of residents or owners important in our local, regional, or national history. None of the owners and occupants were influential or claim any noteworthy accomplishments that would make the property significant by association. Therefore, the property is not eligible for listing in the California register under Criterion 2 (Persons).

In addition, the building at 1300 Columbus Avenue is a modest example of a blend of key elements of the Mansard style with Modern and New Formalism characteristics and is neither an important example of any individual style or a particularly noteworthy representation of the fusion of those styles. The building is not a distinctive work of architecture and is not associated with a noteworthy architect. Therefore, the property is not eligible for listing in the California register under Criterion 3 (Architecture). Finally, based upon a review of information in the department's records, the subject property is also not significant under Criterion 4 (Information Potential), which is typically associated with either archaeological resources or rare construction types when involving the built environment. The subject property is not an example of a rare construction type and would therefore not be eligible for listing in the California register under Criterion 4.

The nearest historic districts include the Aquatic Park Historic District, two blocks northwest of the project site, and the Port of San Francisco Embarcadero Historic District located approximately three blocks to the northeast, both of which are listed in the National register. The site itself is not located in an identified historic district. The surrounding neighborhood includes a public park and a range of residential and commercial buildings including mixed-use, retail, hotel, and office buildings that do not possess sufficient architectural, historical significance, or cohesion to identify as a historic district. The nearest known historic building is the Haslett Warehouse (City Landmark 59), which is located across Joseph Conrad Mini Park from the project site and would not be directly or indirectly affected by the proposed project.

In light of the above, the property is not eligible for listing in the California register either individually or as a contributor to a potential historic district. Planning department staff has thus determined the property at 1300 Columbus Avenue is not a historical resource as defined by CEQA. Therefore, the alteration of the existing structure at 1300 Columbus Avenue would have a less-than-significant impact on historic resources.

Impact CR-2: The proposed project could cause a substantial adverse change in the significance of an archaeological resource and potentially disturb human remains, including those interred outside of formal cemeteries. (Less than Significant with Mitigation)

Determining the potential for encountering archaeological resources requires reviewing relevant factors such as the location, depth, and amount of excavation proposed as well as any recorded information on known resources in the area. The proposed project would require excavation of approximately 820 cubic yards to a depth of 6 feet below the existing basement to accommodate foundations. Pile installation would

require soil disturbance to a depth of approximately 70 feet below ground surface at limited locations within the project site. Due to the depth of the proposed soil disturbance, the planning department conducted a *preliminary archaeological review*.[18] The existing building is on bay fill, approximately 100 feet west of the 1857 shoreline. Although there are no known archaeological sites within the project footprint, the project site is within an area designated as having high prehistoric sensitivity for submerged prehistoric resources. The proposed project, therefore, has the potential to cause a substantial adverse change to subsurface archaeological resources by adversely affecting the significance of potential resources should these be encountered during project construction. The partial or total destruction of archaeological resources by the project would impair the ability of such resources to convey important scientific and historical information. Implementation of **Mitigation Measure M-CR-2, Archaeological Testing** would reduce the potential impact to a less-than-significant level.

Mitigation Measure M-CR-2: Archaeological Testing

Based on a reasonable presumption that archeological resources may be present within the project site, the following measures shall be undertaken to avoid any potentially significant adverse effect from the proposed project on buried or submerged historical resources. The project sponsor shall retain the services of a qualified archeological consultant having expertise in California prehistoric and urban historical archeology. The archeological consultant shall undertake an archeological testing program as specified herein. In addition, the consultant shall be available to conduct an archeological monitoring and/or data recovery program if required pursuant to this measure. The archeological consultant's work shall be conducted in accordance with this measure at the direction of the environmental review officer (ERO). All plans and reports prepared by the consultant as specified herein shall be submitted first and directly to the ERO for review and comment, and shall be considered draft reports subject to revision until final approval by the ERO. Archeological monitoring and/or data recovery programs required by this measure could suspend construction of the project for up to a maximum of four weeks. At the direction of the ERO, the suspension of construction can be extended beyond four weeks only if such a suspension is the only feasible means to reduce to a less than significant level potential effects on a significant archeological resource as defined in CEQA Guidelines section 15064.5 (a)(c).

Archeological Testing Program. The archeological consultant shall prepare and submit to the ERO for review and approval an archeological testing plan (ATP). The archeological testing program shall be conducted in accordance with the approved ATP. The ATP shall identify the property types of the expected archeological resource(s) that potentially could be adversely affected by the proposed project, the testing method to be used, and the locations recommended for testing. The purpose of the archeological testing program will be to determine to the extent possible the presence or absence of archeological resources and to identify and to evaluate whether any archeological resource encountered on the site constitutes a historical resource under CEQA.

At the completion of the archeological testing program, the archeological consultant shall submit a written report of the findings to the ERO. If based on the archeological testing program the

[18] San Francisco Planning Department, *Environmental Planning Preliminary Archaeological Review: 1300 Columbus Avenue, San Francisco, California*, May 13, 2019.

archeological consultant finds that significant archeological resources may be present, the ERO in consultation with the archeological consultant shall determine if additional measures are warranted. Additional measures that may be undertaken include additional archeological testing, archeological monitoring, and/or an archeological data recovery program. If the ERO determines that a significant archeological resource is present and that the resource could be adversely affected by the proposed project, at the discretion of the project sponsor either:

a. The proposed project shall be re-designed so as to avoid any adverse effect on the significant archeological resource; or

b. A data recovery program shall be implemented, unless the ERO determines that the archeological resource is of greater interpretive than research significance and that interpretive use of the resource is feasible.

Archeological Data Recovery Program. The archeological data recovery program shall be conducted in accord with an archeological data recovery plan (ADRP). The archeological consultant, project sponsor, and ERO shall meet and consult on the scope of the ADRP prior to preparation of a draft ADRP. The archeological consultant shall submit a draft ADRP to the ERO. The ADRP shall identify how the proposed data recovery program will preserve the significant information the archeological resource is expected to contain. That is, the ADRP will identify what scientific/historical research questions are applicable to the expected resource, what data classes the resource is expected to possess, and how the expected data classes would address the applicable research questions. Data recovery, in general, should be limited to the portions of the historical property that could be adversely affected by the proposed project. Destructive data recovery methods shall not be applied to portions of the archeological resources if nondestructive methods are practical.

The scope of the ADRP shall include the following elements:

- *Field Methods and Procedures.* Descriptions of proposed field strategies, procedures, and operations.

- *Cataloguing and Laboratory Analysis.* Description of selected cataloguing system and artifact analysis procedures.

- *Discard and Deaccession Policy.* Description of and rationale for field and post-field discard and deaccession policies.

- *Interpretive Program.* Consideration of an onsite/off-site public interpretive program during the course of the archeological data recovery program.

- *Security Measures.* Recommended security measures to protect the archeological resource from vandalism, looting, and non-intentionally damaging activities.

- *Final Report.* Description of proposed report format and distribution of results.

Curation. Description of the procedures and recommendations for the curation of any recovered data having potential research value, identification of appropriate curation facilities, and a summary of the accession policies of the curation facilities.

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

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

Nothing in existing State regulations or in this mitigation measure compels the project sponsor and the ERO to accept treatment recommendations of the MLD. However, if the ERO, project sponsor and MLD are unable to reach an Agreement on scientific treatment of the remains and associated or unassociated funerary objects, the ERO, with cooperation of the project sponsor, shall ensure that the remains associated or unassociated funerary objects are stored securely and respectfully until they can be reinterred on the property, with appropriate dignity, in a location not subject to further or future subsurface disturbance.

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

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

Once approved by the ERO, copies of the FARR shall be distributed as follows: California Archaeological 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 Major Environmental Analysis division of the planning department shall receive 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 in or the high interpretive value of the resource, the ERO may require a different final report content, format, and distribution than that presented above.

Impact C-CR-1: The proposed project, in combination with past, present, and reasonably foreseeable future projects, would not result in cumulative impacts on cultural resources. (Less than Significant)

Cumulative impacts occur when project-specific impacts (which may be individually significant or less than significant) combine with similar impacts from other past, present, or reasonably foreseeable future projects in a similar geographic area. There are no known cumulative projects within the vicinity of the site that would result in the demolition of a historic resource, or otherwise indirectly affect historic resources. As discussed above, the proposed project itself would not directly or indirectly impact a historic architectural resource because the existing building on the site is not an identified resource and the project site is not located within a historic district. Therefore, impacts of the project would be less-than-significant and would not combine with cumulative projects to result in a cumulative impact to such resources.

Archaeological resources are non-renewable members of a finite class. All adverse effects to archaeological resources erode a dwindling cultural/scientific resource base. Federal and state laws protect archaeological resources in most cases, either through project redesign or requiring that the scientific data present within an archaeological resource be archeologically recovered. Project-related impacts on archaeological resources and human remains are site-specific and generally limited to the project's construction area and would be mitigated to a less-than-significant level with implementation of Mitigation Measure M-CR-2. There are no other projects that have the potential to affect the same resources as the proposed project. For these reasons, the proposed project, in combination with other past, present, and reasonably foreseeable future projects, would not result in a cumulatively considerable impact on archaeological resources or human remains and this impact would be less than significant.

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

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

Tribal cultural resources are those resources that meet the definitions in public resources code section 21074. Tribal cultural resources are defined as sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are also either (a) included or determined to be eligible for inclusion in the California register or (b) included in a local register of historical resources as defined in public resources code section 5020.1(k). Based on discussions with Native American tribal representatives, in San Francisco, prehistoric archaeological resources are presumed to be potential tribal cultural resources. A tribal cultural resource is adversely affected when a project impacts its significance.

Pursuant to Assembly Bill 52, lead agencies are required to contact the Native American tribes that are culturally or traditionally affiliated with the geographic area in which the project is located. Notified tribes have 30 days to request consultation with the lead agency to discuss potential impacts on tribal cultural resources and measures for addressing those impacts.

On June 25, 2019, the planning department mailed a "Tribal Notification Regarding Tribal Cultural Resources and CEQA" to the appropriate Native American tribal representatives who have requested notification. During the 30-day comment period, no Native American tribal representatives contacted the planning department to request consultation.

As noted under Impact CR-2, the proposed project could result in a significant impact on archaeological resources without mitigation, which would be mitigated to less-than-significant with Mitigation Measure M-CR-2, Archaeological Testing. In the event that prehistoric archaeological resources are damaged, the proposed project would have a significant impact on tribal cultural resources. However, with implementation of **Mitigation Measure M-TC-1, Tribal Cultural Resources Interpretive Program,** (described below), developed in discussion with local Native American tribal representatives, and Mitigation Measure M-CR-2 described above, the proposed project would have a less than significant effect on tribal cultural resources. For these reasons, the proposed project would not cause a substantial adverse change in the significance of a tribal cultural resource, and this impact would be less than significant.

Mitigation Measure M-TC-1: Tribal Cultural Resources Interpretive Program

If the ERO determines that a significant archaeological resource is present, and if in consultation with the affiliated Native American tribal representatives, the ERO determines that the resource constitutes a tribal cultural resource (TCR) and that the resource could be adversely affected by the proposed project, the proposed project shall be redesigned so as to avoid any adverse effect on the significant tribal cultural resource, if feasible.

If the ERO determines that preservation-in-place of the TCR is both feasible and effective, then the archaeological consultant shall prepare an archaeological resource preservation plan (ARPP). Implementation of the approved ARPP by the archaeological consultant shall be required when feasible.

If the ERO, in consultation with the affiliated Native American tribal representatives and the project sponsor, determines that preservation-in-place of the tribal cultural resources is not a sufficient or feasible option, the project sponsor shall implement an interpretive program of the TCR in consultation with affiliated tribal representatives. An interpretive plan produced in consultation with the ERO and affiliated tribal representatives, at a minimum, and approved by the ERO would be required to guide the interpretive program. The plan shall identify, as appropriate, proposed locations for installations or displays, the proposed content and materials of those displays or installation, the producers or artists of the displays or installation, and a long-term maintenance program. The interpretive program may include artist installations, preferably by local Native American artists, oral histories with local Native Americans, artifacts displays and interpretation, and educational panels or other informational displays.

Impact C-TC-1: The proposed project, in combination with past, present, and reasonably foreseeable future projects, would not result in cumulative impacts on tribal cultural resources. (Less than Significant)

As explained in Impact C-CR-1 above, impacts to archaeological resources, including tribal cultural resources, are typically site-specific and do not generally combine to result in cumulative impacts. Impacts

of the proposed project on tribal cultural resources would be less than significant with implementation of Mitigation Measures M-CR-2 and M-TC-1. There are no other projects that have the potential to affect the same resources as the proposed project. For these reasons, the proposed project, in combination with other past, present, and reasonably foreseeable future projects, would not result in a cumulatively considerable impact on tribal cultural resources and this impact would be less than significant.

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

The following discussion is based on the information provided in the *transportation impact study* prepared for the proposed project in accordance with the San Francisco Planning Department's Transportation Impact Analysis Guidelines for Environmental Review.[19] The following considers former hotel operations as part of the baseline condition; however, transportation impacts of the project are evaluated for the whole of the future hotel operations, and not just the individual hotel expansion. This approach provides for a more holistic and conservative analysis and is applicable to this section because transportation impacts, particularly those related to circulation and loading, would affect the entire project site and not just the proposed expansion.

Setting

Columbus Avenue runs diagonally from the northwest to the southeast through a primarily east-west and north-south grid. Several streets in the proximity to the project site are two-way. Vehicle and pedestrian access to the project site is currently along Columbus Avenue, North Point Street, Beach Street, Jones Street, and Leavenworth Street. Local access is provided by arterial and local roadways in proximity to the project site.

According to the general plan, Columbus Avenue is a major east-west arterial, with two travel lanes in each direction. Metered parallel parking is provided on both sides of Columbus Avenue, with the exception of sections including bus stops and tour bus loading between Beach and Bay streets. Columbus Avenue is also classified as a Transit Important Street and a Neighborhood Commercial Street.[20] North Point Street runs in an east-west direction and is a major arterial with a single travel lane in each direction. Metered parallel parking is provided on both sides of the street east of Jones Street and on the west side of Columbus Avenue. There are no existing exclusive bicycle facilities on Columbus Avenue adjacent to the project site; however, an existing on-street *class III* bike route[21] is present along south and northbound Columbus Avenue in the vicinity of the project site.

North Point Street fronting the project site includes metered tour bus parking (110 feet, 7 a.m. to 7 p.m., daily), tour bus loading (55 feet, 9 a.m. to 7 p.m., 20 minutes) and 75 feet of red curb for a Muni bus stop. North Point Street is also classified as a Transit Important Street and a Neighborhood Commercial Street. An existing east-west on-street *class II* bicycle lane[22] is present on North Point Street adjacent to the southern frontage of the project site.

Bay Street runs in an east-west direction one block south of the site and is a major arterial with two travel lanes in each direction. Within the vicinity of the project site, 2-hour or permitted parking is provided on

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[19] Stantec Consulting Services and Advanced Mobility Group, *1300 Columbus Avenue Transportation Impact Study*, San Francisco, CA, September 26, 2019.

[20] According to the Transportation Element of the San Francisco General Plan (Table 4: Transit Preferential Street Classification System), a transit important street meets one of three criteria: high transit ridership, or; high frequency of service, or; surface rail. City and County of San Francisco, San Francisco General Plan, Transportation Element, Amended through December 7, 2010.

[21] Bikeways are classified as *class I*, *class II*, or *class III* facilities by the California Streets and Highway Code, section 890.4. *Class III* facilities are signed bike routes that provide for shared use with motor vehicle traffic.

[22] *Class II* bicycle facilities provide a striped lane on a street or highway.

both sides, with the exception of sections including bus stops near Columbus Avenue. Bay Street is also classified as a Transit Important Street and a Neighborhood Commercial Street. There are no existing exclusive bicycle facilities on Bay Street adjacent to the project site.

Beach Street is an east-west city street roadway that runs between The Embarcadero to the east and Polk Street to the west. In the vicinity of the project site, the roadway provides a single travel lane in each direction and metered parallel parking on the north side of the street, with the exception of the passenger loading zone in front of the Marriot Courtyard at 580 Beach Street. There are no existing bicycle facilities on Beach Street in the vicinity of the project site.

Jones Street is a north-south city street roadway that runs from Market Street (south) to Columbus Avenue (north). In the vicinity of the project site, the roadway provides one travel lane in each direction and metered parallel parking on the west side of the street. There are no existing bicycle facilities on Jones Street in the vicinity of the project site.

The project site is well served by local public transit service, Muni. There are eight Muni bus routes in the vicinity of the project site. The closest surface transit stop is located on the project site at the intersection of Columbus Avenue and Jones Street, approximately one block south of the project site, which serves the 47-Van Ness route. Additional surface transit stops within 0.5 mile of the project site serve the E-Embarcadero, F-Market & Wharves, 19-Polk, 30-Stockton, PH-Powell/Hyde Cable Car, PM-Powell/Mason Cable Car, and 39-Coit routes. The Muni routes serving the project area provide connections to regional transit providers, including the Bay Area Rapid Transit District (BART), Caltrain, SamTrans, Golden Gate Transit (bus and ferry), San Francisco Bay Ferry, AC Transit, and Amtrak.

Vehicle Miles Traveled in San Francisco and the Bay Area

Many factors affect travel behavior. These factors include density, diversity of land uses, design of the transportation network, access to regional destinations, distance to high-quality transit, development scale, demographics, and transportation demand management. Typically, low-density development at great distance from other land uses, located in areas with poor access to non-private vehicular modes of travel, generate more automobile travel compared to development located in urban areas, where a higher density, mix of land uses, and travel options other than private vehicles are available.

Given these travel behavior factors, San Francisco has a lower average daily vehicle miles traveled (VMT) ratio than the nine-county San Francisco Bay Area region. In addition, some areas of the city have lower VMT ratios than other areas of the city. These areas of the city can be expressed geographically through transportation analysis zones. The zones vary in size from single city blocks in the downtown core, multiple blocks in outer neighborhoods, to even larger zones in historically industrial areas like the Hunters Point Shipyard. Transportation analysis zones (TAZs) are used in transportation planning models for transportation analysis and other planning purposes.

The San Francisco County Transportation Authority (the transportation authority) uses the San Francisco Chained Activity Modeling Process (SF-CHAMP) to estimate VMT by private automobiles and taxis for different land use types. The SF-CHAMP model is a regional travel demand forecasting model that assigns all predicted trips within, across, or to or from San Francisco onto the roadway network and the public transit system, by mode and transit carrier for a particular scenario. For example, in the 2040 SF-CHAMP

model run, trips are assigned to and from each of the TAZs across San Francisco based on the land use development that is projected. Trips that cross San Francisco, but do not have an origin or destination in the city are projected using inputs from the regional transportation model.

The travel behavior from SF-CHAMP is modeled based on the following inputs:

1. Projected land use development (based on the planning department's pipeline) and population and employment numbers – as provided by the planning department, based on the Association of Bay Area Governments Projections (currently the Projections 2013 (Sustainable Communities Strategy).
2. Observed behavior from the California Household Travel Survey 2010-2012.
3. Census data regarding automobile ownership rates and county-to-county worker flows.
4. Observed vehicle counts and transit boardings.

The SF-CHAMP model simulates the daytime service population, which is a set of "people" that represent all travelers making trips to and from each TAZ the entire day.

The daily VMT output from the SF-CHAMP model for residential and office uses comes from a tour-based analysis. The tour-based analysis examines the entire chain of trips over the course of a day, not just trips to and from the project site. In this way, all of the VMT for an individual resident or employee is included, not just trips into and out of the person's home or workplace. For example: a resident leaves her apartment in the morning, stops for coffee, and then goes to the office. In the afternoon, she heads out to lunch, and then returns to the office, with a stop at the drycleaners on the way. After work she goes to the gym to exercise, and then joins some friends at a restaurant for dinner before returning home. The tour-based approach would add up the total amount driven and assign the daily VMT to this resident for the total number of miles driven on the entire "tour."

The daily VMT output from the SF-CHAMP model for retail uses comes from a trip-based analysis, which counts VMT from individual trips to and from the project site. A trip-based approach, as opposed to a tour-based approach, is necessary for retail projects because a tour is likely to consist of trips stopping in multiple locations, and the summarizing of tour VMT to each location would overestimate VMT.[23,24]

For residential development (used as a proxy for the hotel use), the existing regional average daily VMT per capita is 17.2. For retail development, existing regional average daily work-related VMT per employee is 14.9.

[23] To state another way: a tour-based assessment of VMT at a retail site would consider the VMT for all trips in the tour, for any tour with a stop at the retail site. If a single tour stops at two retail locations, for example, a coffee shop on the way to work and a restaurant on the way back home, then both retail locations would be allotted the total tour VMT. A trip-based approach allows the department to apportion all retail-related VMT to retail sites without double-counting.

[24] San Francisco Planning Department, *Executive Summary: Resolution Modifying Transportation Impact Analysis, Appendix F, Attachment A*, March 3, 2016.

San Francisco 2040 cumulative conditions were projected using an SF-CHAMP model run, using the same methodology as outlined above for existing conditions, but include residential and job growth estimates and reasonably foreseeable transportation investments through 2040. Per the Governor's Office of Planning and Research (OPR) VMT methodology, hotel is treated as residential and restaurant is treated as retail. For residential development, the projected 2040 regional average daily VMT per capita is 16.1. For retail development, the projected 2040 regional average daily VMT per employee is 14.6. **Table 3, Daily Vehicle Miles Traveled**, summarizes existing and cumulative VMT for the region and for the TAZ in which the project site is located, TAZ 852.

Table 3: Daily Vehicle Miles Traveled

Land Use	Existing			Cumulative 2040		
	Bay Area Regional Average	Bay Area Regional Average minus 15% (threshold)	TAZ 852	Bay Area Regional Average	Bay Area Regional Average minus 15% (threshold)	TAZ 852
Retail	14.9	12.6	6.0	14.6	12.4	5.9
Residential[1]	17.2	14.6	4.4	16.1	13.7	4.0

Source: CTA SF CHAMP Model, accessed April 25, 2018

[1] Hotel is treated as residential for screening and analysis per OPR VMT Assessment Methodology.

Vehicle Miles Traveled Impact Analysis Methodology

Land use projects may cause substantial additional VMT. The following discussion identifies thresholds of significance and screening criteria used to determine if a land use project would result in significant impacts under the VMT metric.

Residential Projects

Trips associated with hotel projects typically function similar to residential projects. Therefore, for the purposes of VMT analysis, hotel land uses are treated as residential for screening and analysis.[25] For residential projects, a project would generate substantial additional VMT if it exceeds the regional household VMT per capita minus 15 percent.[26] As documented in OPR's Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts Under CEQA (OPR's Proposed Transportation Impact

[25] The proposed 174 hotel rooms qualify as a residential use for the purpose of VMT analysis as defined under the "other land use projects" described in Appendix A of the *Eligibility Checklist: CEQA section 21099 – Modernization of Transportation Analysis for 1300 Columbus Avenue*, March 5, 2019.

[26] OPR's transportation impact guidelines states a proposed project would cause substantial additional VMT if it exceeds both the existing city household VMT per capita minus 15 percent and existing regional household VMT per capita minus 15 percent. In San Francisco, the city's average VMT per capita is lower (8.4) than regional average (17.2). Therefore, the city average is irrelevant for the purposes of the analysis.

Guidelines),[27] a 15 percent threshold below existing development is "both reasonably ambitious and generally achievable."[28]

Retail Projects

For retail projects, a project would generate substantial additional VMT if it exceeds regional VMT per employee minus 15 percent.[29] Similar to residential projects, as documented in the OPR's Proposed Transportation Impact Guidelines, a 15 percent threshold below existing development is "both reasonably ambitious and generally achievable."[30] This approach is consistent with CEQA section 21099 and the thresholds of significance for other land uses recommended in OPR's Proposed Transportation Impact Guidelines.[31]

OPR's Proposed Transportation Impact Guidelines provides screening criteria to identify types, characteristics, or locations of land use projects that would not exceed these VMT thresholds of significance. OPR recommends that if a project or land use proposed as part of the project meets any of the screening criteria, then VMT impacts are presumed to be less than significant for that land use and a detailed VMT analysis is not required. The screening criteria applicable to the proposed project and their implementation in San Francisco are described below:

- *Map-Based Screening for Office and Retail Projects.* OPR recommends mapping areas where VMT falls below the applicable land use threshold. Accordingly, the transportation authority has developed maps depicting existing VMT levels in San Francisco for office and retail land uses based on the SF-CHAMP 2012 base-year model run. The planning department uses these maps and associated data to determine whether a proposed project is located in an area of the city that is below the applicable VMT threshold(s).

- *Proximity to Transit Stations.* OPR recommends that residential, retail, and office projects, as well projects that are a mix of these uses, proposed within one half-mile of an existing major transit stop (as defined by CEQA Guidelines section 21064.3) or an existing stop along a high-quality transit corridor (as defined by CEQA Guidelines section 21155) would not result in a substantial increase in VMT. However, this presumption would not apply if the project would: (1) have a floor area ratio of less than 0.75; (2) include more parking for use by residents, customers, or

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[27] Office of Planning and Research, Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts Under CEQA, *http://www.opr.ca.gov/ceqa/updates/sb-743/,* January 2016.

[28] Office of Planning and Research, Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts Under CEQA, *http://www.opr.ca.gov/ceqa/updates/sb-743/,* accessed July 11, 2019. See page III: 20.

[29] Ibid.

[30] Ibid.

[31] Governor's Office of Planning and Research, Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts Under CEQA, January 2016.

employees of the project than required or allowed, without a conditional use authorization; or (3) be inconsistent with the applicable sustainable communities strategy.[32]

- *Small Projects Screening Criterion.* OPR recommends that lead agencies may generally assume that a project would not have significant VMT impacts if the project would either: (1) generate fewer trips than the level for studying consistency with the applicable congestion management program or (2) where the applicable congestion management program does not provide such a level, fewer than 100 vehicle trips per day. The transportation authority's 2015 San Francisco Congestion Management Program does not include a trip threshold for studying consistency. Therefore, the planning department uses a screening criterion of 100 vehicle trips per day, whereby a project that would generate vehicle trips equal to or below this threshold would not generate a substantial increase in VMT.

Induced Automobile Travel Analysis

Transportation projects may substantially induce additional automobile travel. The following identifies thresholds of significance and screening criteria used to determine if transportation projects would result in significant impacts by inducing substantial additional automobile travel.

Pursuant to OPR's Proposed Transportation Impact Guidelines, a transportation project would substantially induce automobile travel if it would generate more than 2,075,220 VMT per year. This threshold is based on the fair share VMT allocated to transportation projects required to achieve California's long-term greenhouse gas emissions reduction goal of 40 percent below 1990 levels by 2030.

OPR's Proposed Transportation Impact Guidelines includes a list of transportation project types that would not likely lead to a substantial or measureable increase in VMT. If a project fits within the general types of projects (including combinations of types) described in the transportation impact guidelines, then it is presumed that VMT impacts would be less than significant and a detailed VMT analysis is not required. The following types of transportation projects included in the transportation impact guidelines are applicable to the proposed modifications to the Leavenworth Street, Columbus Avenue, and North Point Street sidewalks, which include the introduction of 20 *class 2* bicycle parking spaces, a 6-foot curb extension, reconfiguration of on-street metered parking and on-street tour bus parking and loading zones, and the installation of six new street trees:

- Active Transportation, Rightsizing (aka Road Diet), and Transit Projects:
    - Infrastructure projects, including safety and accessibility improvements, for people walking or bicycling.

[32] A project is considered to be inconsistent with the sustainable communities strategy is development is located outside of areas contemplated for development in the sustainable communities strategy.

- Other Minor Transportation Projects:
    - Adoption, removal, or modification of on-street parking or loading restrictions (including meters, time limits, accessible spaces, and preferential/reserved parking permit programs).

Travel Demand

Localized trip generation of the proposed project was calculated using a trip-based analysis and information included in the 2019 *Transportation Impact Analysis Guidelines for Environmental Review* (SF Guidelines) developed by the San Francisco Planning Department.[33] The proposed project would generate 6,315 person trips (inbound and outbound) on a weekday daily basis, consisting of 1,315 person-trips by auto, 26 person-trips by private shuttle service, 1,321 transit person-trips, 3,473 walk person-trips, and 180 bike-person trips. During the p.m. peak hour, the proposed project would generate an estimated 760 person-trips, consisting of 143 person-trips by auto, 2 trips by private shuttle service, 173 transit person-trips, 418 walk person-trips, and 24 bike-person trips.[34]

Impact Analysis

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

Construction is anticipated to occur over approximately 16 months in six overlapping phases.[35] Construction-related activities in San Francisco typically occur on weekdays from 7 a.m. to 8 p.m. and may occur on weekends. The hours of construction for the proposed project are anticipated to be the same. The construction contractor would be required to comply with the San Francisco Noise Ordinance (Article 29 of the police code), the City of San Francisco's Regulations for Working in San Francisco Streets (the Blue Book) as well as the public works code, if applicable. In addition, construction staging would occur onsite and may also occur on the sidewalks adjacent to the project site on North Point Street, Columbus Avenue and Leavenworth Street.

During construction, the project sponsor proposes to utilize approximately 100 feet of North Point Street between the driveway and the Muni bus stop for crane, deliveries and on/off loading during site preparation and foundation for approximately 10 months. During the same time, approximately 70 feet of Columbus Avenue would be used periodically. Utilizing Columbus Avenue for construction purposes would be limited to certain days of the week since concrete pours are typically scheduled on a cycle. After

[33] Stantec Consulting Services and Advanced Mobility Group, *1300 Columbus Avenue Transportation Impact Study, San Francisco, CA*, September 26, 2019.

[34] It should be noted that trip generation estimates are considered to be conservative given that the retail use category was assumed to be a fast food restaurant, which has a high travel demand. Because it is unlikely that a fast food operator would occupy the retail space, the actual travel demand is likely to be lower than estimated.

[35] CFW, LLC, 1300 Columbus Avenue Construction Information Worksheet, March 21, 2019.

the initial 10 months, the staging area along North Point Street would be reduced to 50 feet during interior and façade work for approximately six months and use of Columbus Avenue would be stopped. This would provide an approximately 22-foot space for tour bus loading on North Point Street at all times during construction. All surrounding sidewalks would remain functional and protected throughout all construction phases. In order to avoid trucks stopping in the street during the concrete pours, trucks would be directed to wait in the alley. Workers would be encouraged to either use the alley for parking or be shuttled to the site from a designated location (to be specified pursuant to a contractor parking plan to be approved by public works). The project sponsor would encourage the use of public transportation. In addition, the existing garage on the property would be used for some parking and small item staging and the existing courtyard on the site would be used as a lay down area for materials. The Muni bus stop on North Point Street would not be used for construction parking and would remain in operation throughout all construction phases. However, prior to construction, if appropriate, the project contractor would contact SFMTA to coordinate construction activities and address any potential consequences to public transit operations.

Prior to construction, the project sponsor and construction contractor(s) may be required to meet with San Francisco Public Works (public works) and SFMTA staff to review the conditions of any of the required permits. Specifically, any proposed long-term travel lane and sidewalk closures, and other temporary traffic and transportation changes may be subject to review by the SFMTA's Transportation Advisory Staff Committee (advisory committee). The advisory committee is an interdepartmental committee that includes representatives from public works, the transportation agency, the police department, the fire department, and the planning department.

During the construction period, there would be a flow of construction-related trucks into and out of the site. There would be an average of 10 to 15 construction trucks traveling to the site on a daily basis, with the greatest number of construction truck trips anticipated during the excavation, foundation, and interior finishing phases of construction. Construction truck traffic could result in a temporary lessening of the capacities of streets due to the slower movement and larger turning radii of trucks, which may block travel lanes, and could affect both traffic and Muni operations. In general, truck travel to the project site from the South Bay would be via the I-280 ramps at King Street and from within San Francisco via The Embarcadero, Bay Street and Columbus Avenue, and from the East Bay via the I-80 ramps at Harrison Street, and from within San Francisco via the Embarcadero, Bay Street and Columbus Avenue.

The project sponsor would be required to follow the SFMTA Regulations for Working in San Francisco Streets ("The Blue Book") and would reimburse SFMTA for installation and removal of temporary striping and signage changes required during project construction. All temporary traffic lane closures would be coordinated with the City in order to minimize the impacts on people driving, walking, and bicycling.

There would be an average of 25 to 30 construction workers per day at the project site. The trip distribution and mode split of construction workers are not known. However, it is anticipated that the addition of the worker-related vehicle- or transit-trips would not substantially affect transportation conditions, as any impacts on local intersections or the transit network would be temporary in nature. Construction workers who drive to the site would cause a temporary increase in parking demand. However, as described above, the contractor would be required to prepare and submit a contractor parking plan for review and approval by public works.

Overall, the proposed project would maintain circulation for people walking and would not require travel lane closures that would disrupt or substantially delay vehicles and people bicycling on Columbus Avenue, North Point Street, Jones Street, Leavenworth Street and Beach Street. Furthermore, as described above, construction activities would be required to meet City rules and guidance (i.e., the Blue Book and public works requirements) so that work can be done safely and with the least possible interference for people walking, bicycling, or taking transit and/or transit operations, as well as for other vehicles. Thus, project construction would therefore not result in potentially hazardous conditions. For the reasons described above, the proposed project's construction-related transportation impacts would be less than significant.

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

The proposed project additions (new hotel and retail uses) would add approximately 91 vehicle trips to the transportation network during the p.m. peak hour. These trips would be dispersed to various streets within the project vicinity. The greatest amount of vehicle trips generated by the project site would be added to the Columbus Avenue/North Point Street intersection. Based on the qualitative queueing analysis conducted, the proposed project is not expected to result in substantial queuing at intersections adjacent to the project site or the project driveways.[36]

As further discussed under Impact TR-6, below, approximately 79 feet (approximately three spaces) of white curb for passenger loading would be provided off-street in the porte cochère and an additional 67 (approximately three spaces) and 66 feet (approximately three spaces) would be provided on-street on Columbus Avenue and North Point Street respectively, meeting the passenger loading demand for the proposed project, by providing a total of nine spaces for passenger loading assuming 22 feet length of vehicle per the definition of "passenger car equivalent" in the SF Guidelines.

The proposed project would include narrowing the existing driveway of 20 feet and 6 inches in width along the North Point Street frontage to 18 feet in width. The existing 23-foot-wide driveway along Columbus Avenue would also be narrowed to 18 feet in width and relocated southeastward from 75 feet to 45 feet north of North Point Street. Reduction of the curb cut width on North Point Street and Columbus Avenue would reduce the distance people walking would have to cross in front of the driveways, reducing the amount of time and distance that people walking would be exposed to vehicles entering and exiting the driveways. This reduction would not adversely affect people bicycling, walking or driving such that a significant safety hazard would occur. Relocating the curb cut on Columbus Avenue closer to the Columbus Avenue/North Point Street intersection could lead to potential queueing for vehicles entering the site from northbound Columbus Avenue should a vehicle be turning into the driveway; however, the drivers of the vehicles would have enough sight distance to see the maneuver. Hence, the relocation is not expected to cause any significant impact on people driving. Since the curb cut would be relocated and not removed, people bicycling would still be able to access the sidewalk and the bike racks on Leavenworth Street. This is not expected to result in any conflicts between people bicycling and people driving.

[36] Stantec Consulting Services and Advanced Mobility Group, *1300 Columbus Avenue Transportation Impact Study, San Francisco, CA,* September 26, 2019.

The proposed project would also include a reconfiguration of the interior of the existing garage. The proposed interior reconfiguration would not affect the circulation of vehicles in the garage. Per the qualitative queuing analysis described above, the proposed reconfiguration is not expected to cause additional queuing of vehicles in the parking garage or on-street on North Point Street and Columbus Avenue by vehicles entering or exiting.

In addition, the proposed project does not propose any features that would substantially increase the creation, frequency, or severity, of conflicts between vehicles and other ways people travel. Therefore, it would not be expected to cause or to contribute to any significant driving hazards for people driving and this impact would be less than significant.

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

Pedestrian Facilities

Trips generated by the proposed project in the vicinity of the project site would include walk trips to and from the project site, plus walk trips to and from transit stops. The proposed project is expected to generate 591 trips of people walking during a typical weekday p.m. peak hour, including 173 transit trips, and 418 walk trips.[37] The primary access point for people walking would be provided at the hotel main entrance facing the intersection of Columbus Avenue and North Point Street, along with a few secondary access points on both North Point Street and Columbus Avenue frontages to the proposed retail/restaurant and fitness spaces. Given the high number of transit stops in proximity to the project site, the transit-related trips of people walking would likely occur within a couple of blocks of the project site.

Currently, there are sidewalks on all streets in the study area. There are generally no notable deficiencies in sidewalks. However, SFMTA/Clear Channel plans to replace the existing bus shelter at the northwest corner of North Point Street at Jones Street with a wall-style non-roof bus shelter configuration, to replace the three-foot setback with a new approximately five-foot setback from the curb on North Point Street, to allow for compliance with the Americans with Disabilities Act (ADA). The proposed project would not result in changes to the sidewalk along project frontages, except new street trees and *class 2* bicycle parking (along Leavenworth Street). Given that the proposed project would not include an additional driveway or curb cut (and it would reduce the width of the existing driveways on Columbus Avenue and North Point Street), no conflict points between people walking and vehicles driving would be anticipated to be created or intensified by the proposed project.

Therefore, implementation of the proposed project would not create potentially hazardous conditions for people walking, or otherwise interfere with accessibility to the project site and adjoining area and impacts on people walking would be less than significant.

[37] Stantec Consulting Services and Advanced Mobility Group, *1300 Columbus Avenue Transportation Impact Study, San Francisco, CA,* September 26, 2019.

Bicycle Facilities

The proposed project would add approximately 180 person-trips by bicycle. In proximity to the project site, there is a *class II* bike lane on-street on North Point Street and a *class III* bike route on-street on Columbus Avenue. The project site is also within bicycling distance (between one-quarter and 2 miles) of Muni, BART, Caltrain, SamTrans, AC Transit, and Golden Gate Transit stops/stations. During data collection, the intersections of Columbus Avenue/North Point Street and North Point Street/Jones Street experienced approximately 94 and 117 people bicycling, respectively, travelling on all approaches during the p.m. peak hour between 4 p.m. to 5 p.m., with approximately 69 people bicycling on the westbound approach on North Point Street, seven people bicycling on the northbound approach on Columbus Avenue and 12 people bicycling on the southbound approach on Jones Street along the project frontage.[38] The proposed project would generate approximately 24 bicycle trips during the weekday p.m. peak hour. These project-generated trips of people bicycling would not be substantial enough, in volume, to affect people bicycling or facilities in the project vicinity, including people bicycling at any of the intersections considered in the *transportation impact study*.

In addition, the proposed project would not introduce any design features that would eliminate or impede access to existing bicycle routes in the study area. The proposed project would not include any additional onsite vehicular parking spaces and there is no additional project driveway; ingress and egress to the site would be maintained via driveways on Columbus Avenue and North Point Street. Therefore, the proposed project would not introduce a new conflict point, or intensify an existing conflict point, between people bicycling and people driving vehicles. Also, the project would reduce the width of the driveways on Columbus Avenue and North Point Street. Thus, the increase in the number of people bicycling would not create hazardous conditions for other people bicycling or tour bus loading or tour bus parking, or substantially affect existing bicycle facilities in the study area. Therefore, the impact on people bicycling as a result of the proposed project would be less than significant.

Emergency Access

Emergency vehicle access is currently provided along North Point, Leavenworth, Jones and Beach streets as well as Columbus Avenue. During project operation, project-generated vehicle traffic (835 daily and 91 p.m. peak hour vehicle trips)[39] would be dispersed among multiple streets within the project vicinity and therefore, would not be expected to result in substantial delay in the project vicinity. The proposed project would not alter or significantly affect the access of emergency vehicles to the project site.

[38] Field observations were made at the subject property, 1300 Columbus Avenue, and the project vicinity on January 11, 2018, between 4 p.m. and 6 p.m.

[39] Stantec Consulting Services and Advanced Mobility Group, *1300 Columbus Avenue Transportation Impact Study, San Francisco, CA,* September 26, 2019. Figure 2, page 4.

The proposed project includes streetscape improvements at the Columbus Avenue and Leavenworth Street intersection which would include one new curb bulb-out. A turning radius analysis showed that firetrucks would still be able to make turning maneuvers at this intersection, and that emergency access would not be significantly impacted.[40] Therefore, the proposed project would have a less-than-significant impact on emergency access.

Impact TR-4: The proposed project would not result in substantial public transit delays. (Less than Significant)

As stated above, the project site is well served by local and regional public transit service. There are numerous public transit options available within 0.5 mile of the project site. The proposed project would generate 1,321 daily transit trips, including 173 during the p.m. peak hour. These transit trips would be distributed among the multiple transit lines serving the project vicinity. Given the availability of nearby transit, the addition of 173 p.m. peak-hour transit trips would be accommodated by existing capacity. For these reasons, the proposed project would not result in unacceptable levels of transit service or cause a substantial increase in delays or operating costs such that significant adverse impacts in transit service could result. Thus, the proposed project's impact on transit service would be less than significant.

Impact TR-5: The proposed project would not cause substantial additional vehicle miles traveled or substantially induce additional automobile travel. (Less than Significant)

VMT Analysis

Under OPR's direction, hotel use is considered residential for VMT analysis.[41] As shown in **Table 3**, p. 40, the existing average daily residential VMT per capita is 4.4 for TAZ 852, which is approximately 74 percent below the existing regional average daily residential VMT per capita of 17.2. The existing average daily VMT per retail employee, at 6.0 for TAZ 852, is 60 percent below the existing regional average daily VMT per capita of 14.9. Given that the project site is located in an area where existing residential and retail VMT is more than 15 percent below the existing regional average, the proposed project would meet the map-based screening criteria for residential and retail uses. The project site also meets the proximity to transit stations screening criterion.[42] Since the proposed project would meet one or more of the screening criteria, it would not result in a substantial increase in VMT and, as a result, project impacts would be less than significant.

Induced Automobile Travel Analysis

The proposed project is not a transportation project. However, the proposed project would include features such as street trees, bike racks, and a reconfiguration of on-street metered parking and loading zones.

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[40] Stantec Consulting Services and Advanced Mobility Group, *1300 Columbus Avenue Transportation Impact Study, San Francisco, CA,* September 26, 2019. Appendix F.

[41] San Francisco Planning Department, *Eligibility Checklist: CEQA section 21099 – Modernization of Transportation Analysis for 1300 Columbus Avenue, Attachment A*, March 5, 2019.

[42] Ibid.

Specifically, the proposed project would introduce six new street trees and 20 *class 2* bicycle parking spaces on the sidewalk. In addition, a 6-foot curb extension (bulb-out) would be added at the corner of Leavenworth Street and Columbus Avenue. Reconfiguration of on-street metered parking and on-street tour bus parking and loading zones (white curb) along North Point Street, Columbus Avenue, and Leavenworth Street is also proposed. These minor alterations to the transportation network fit within the general types of projects that would not substantially induce automobile travel.[43] Therefore, the proposed project would not result in a significant impact with respect to induced automobile travel.

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

Commercial Loading

The existing hotel contains two off-street freight loading/unloading spaces within the rear alley intersecting Beach Street; each of these spaces can accommodate 32- to 38-foot long trucks. Additionally, two 17-foot-wide off-street commercial loading spaces are provided near the existing porte cochère and accessed via Columbus Avenue. On-street commercial loading zones are also provided on Beach Street adjacent to the project site. Approximately 343 linear feet of yellow curb (13 to 14 automobile spaces) is provided on Beach Street adjacent to the project site between Leavenworth and Jones streets. Of the 343 feet, 75 feet of yellow curb is directly adjacent to the project site on Beach Street.

When the hotel was operational (until 2018), loading vehicles backed in if the docks were open, as this maneuver made the delivery more efficient and set the vehicle properly to head out for the next delivery. If the dock was closed/occupied, delivery vehicles utilized the two yellow zones outside of the alleyway on Beach Street. Loading vehicles entered from both sides of the alley to get to the dock, dependent primarily on where their last delivery was. When the hotel was operational, approximately 23 truck trips were generated for commercial purposes and signs were posted on the building stating that there were to be no deliveries between 11:30 a.m. and 1:30 p.m. and no deliveries after 3 p.m.

The proposed project, combined with the existing hotel portion, is expected to generate 59 daily truck trips, which would result in four loading/unloading delivery/service vehicles during the peak hour of loading with approximately two loading vehicle-trips for the hotel land use and two loading vehicle-trips for the retail land use.

The proposed project would provide two off-street loading spaces as required by the Planning Code section 152.1. Delivery vehicles would utilize the private east-west alley along the northern property edge for commercial freight and delivery service loading for the hotel and retail land uses and waste collection. Loading activities would occur off-street without blocking public right-of-way, including the sidewalk. Delivery vehicles and trash trucks would access the alley from Beach Street and all existing and proposed commercial loading would occur by reversing into the alley for loading. There would be restricted access

[43] Ibid.

for loading from Beach Street with "Authorized Vehicles Only" signage to limit access to the west half of the alley. The east half of the alley would be bidirectional for the existing parking spaces located there.

Per section 27000 of the California Vehicle Code, garbage trucks and construction vehicles with gross vehicle weight rating of 14,000 pounds are required to be equipped by a backup audible alarm. It is expected that all construction and garbage trucks would be equipped with a back-up alarm. It is currently unknown if commercial trucks would have back-up alarms. However, the hotel staff would facilitate the backing-out maneuver for commercial loading vehicles that do not have audible backup alarms. The Beach Street end of the alley would include a fixed decorative fence and tri-parting telescopic gate, or something similar that would be coordinated with the planning department's Urban Design Advisory Team. Additionally, the existing 75-foot-long commercial loading zone on Beach Street between Leavenworth Street and Jones Street, proposed to be reduced to 73 feet, would be utilized if additional loading space is necessary. To ensure that commercial loading vehicles that are not equipped with back up alarms do not interfere with pedestrian and bicycle circulation and safety, **Improvement Measure TR-6: Commercial Loading Maneuvers**, below, is recommended.

Improvement Measure TR-6: Commercial Loading Maneuvers

Hotel staff should facilitate the back-out maneuver from the onsite alley for commercial loading vehicles that do not have audible back-up alarms.

Most of the truck deliveries would occur in the early morning before 8 a.m., when both onsite loading docks as well as the commercial loading zones along the south side of Beach Street between Leavenworth Street and Jones Street would be available and designated for loading activities. The hotel (existing plus proposed addition) would generate three to four trucks during the peak delivery hour (between 5 a.m. and 8 a.m.), which could be accommodated within the off-street loading space and the on-street commercial loading zones on Beach Street (each 73 feet, 35 feet, 105 feet, and 128 feet, respectively, from Leavenworth Street eastward toward Jones Street). Per the project sponsor, the service providers for the existing hotel confirmed that the trucks would continue to back in if the docks are open. If the off-street space is closed/occupied, the truck would then utilize one of the aforementioned on-street commercial loading zones, north of the alley, on Beach Street.

For parcel deliveries (e.g., FedEx), which would occur later in the day (likely between 12 p.m. and 5 p.m.), the project site owner or operator would utilize the drop-off/pick-up zone within the hotel porte cochère. Since such deliveries usually would be approximately 20 minutes or less in duration, it would not substantially affect the regular pick-up and drop-off activities for the hotel and retail uses.

Restaurant loading demand typically consists of daily deliveries, which would use the off-street loading spaces provided by the project. The retail and restaurant land uses would generate approximately two trucks during the peak delivery hour, which is between 10 a.m. and 1 p.m. and would be accommodated onsite in the hotel rear alley.

Therefore, the proposed project would not create potentially hazardous traffic conditions or significant delays affecting traffic, transit, bicycles, or pedestrians, and the proposed project's impacts related to commercial loading would be less than significant.

Passenger Loading

The existing porte cochère is used for off-street guest and passenger pick-up and drop-off. No on-street passenger loading zones are provided adjacent to the project site. Per the San Francisco Transportation Impact Analysis Guidelines, passenger loading methodology, passenger loading demand is the number of loading spaces generated by a land use during any one minute of the peak hour throughout the average peak period, i.e., Wednesday, Thursday, or Friday, from 5 p.m. to 8 p.m. The proposed project would generate loading demand for approximately two spaces for the hotel land use and one space for the restaurant land use during any one minute of the p.m. peak hour. Based on the proposed site plan, 79 feet (approximately three spaces) of white curb for passenger loading would be provided off-street in the porte cochère and an additional 67 (approximately three spaces) and 66 feet (approximately three spaces) would be provided on-street on Columbus Avenue and North Point Street respectively, meeting the passenger loading demand of three passenger loading spaces during any one minute of the p.m. peak hour for the proposed project, by providing a total of nine spaces for passenger loading, assuming 22 feet length of vehicle, per the "passenger car equivalent" definition in the SF Guidelines.

As mentioned previously, the curb on the block would be reconfigured. Changes to tour bus parking and loading are described in Section A, Project Description (p. 3). Passenger loading spaces in the vicinity that would be added include: 66 feet on North Point Street; and 24 feet and 43 feet on either side of the project's entrance driveway on Columbus Avenue. These spaces could also be used by visitors to the site. These changes to the curb designations would be subject to review and approval by SFMTA.

Therefore, the proposed project would not create potentially hazardous traffic conditions or significant delays affecting traffic, transit, bicycles, or pedestrians, and the proposed project's impacts related to passenger loading would be less than significant.

Refuse Collection

Recology currently provides garbage collection services within the project area. Per the project sponsor's communication with Recology,[44] the proposed project would require the following amount of service collection:

1. One to three yard trash collection – three times per week.
2. One to four yards recycle bin collection – five times a week, Monday through Friday.
3. One to two yard compost bin – five times a week, Monday through Friday.

Per Recology, there is sufficient space at the curb on Beach Street and in the alley for garbage collection for the above collection frequency and it recommends that the waste bins be staged in the small alley off Beach Street adjacent to the hotel for the drivers to empty. Based on the width of the alley (20 feet wide) and the driveway approach's current configuration including the cyclone fence and gate, the bins would need to be staged against the neighboring building to the north, and the driver would drive through the gate, which

[44] Marcus Mirt, District Manager, Recology, email correspondence with John Gonzalez, Project Sponsor Representative, Highgate, May 20, 2019.

is closer to the south end of the fence. The drivers would need to roll the bins into position in front of the truck to empty them and roll them back.

The compactor and waste bins would be behind a gate and locked at Recology's recommended location. The property owner's representative (e.g., operator) would unlock the gates and ensure that they are available for pick-up each day that they are scheduled for service.

Recology would provide service in the evening and early morning between 9 p.m. and 6 a.m., utilizing a front-end loader truck. The proposed project would not create potentially hazardous traffic conditions or significant delays affecting traffic, transit, bicycles, or pedestrians, and the proposed project's impacts related to access for refuse collection would be less than significant.

Impact TR-7: The proposed project would not result in secondary effects associated with a substantial vehicle parking deficit. (Less than Significant)

Vehicle parking on the site would be reduced from a total of 220 spaces distributed throughout the basement garage and surface lot to 166 parking spaces (including three new car share spaces) located exclusively within the basement garage. The reduced number of off-street parking spaces provided on the site would be compliant with City parking requirements. The project sponsor would implement a Transportation Demand Management Plan[45] to ensure that the demand for parking is reduced to the extent feasible and that secondary effects associated with motorists searching for available parking would not create potentially hazardous conditions for people walking, bicycling, or driving; or interfere with accessibility for people walking or bicycling or inadequate access for emergency vehicles; or substantially delay public transit.

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

Cumulative impacts related to construction, traffic hazards, pedestrian impacts, bicycle impacts, transit impacts, VMT, loading, and parking are discussed below. As discussed in the analysis, transportation impacts of the proposed project would not be cumulatively considerable and these impacts would be less than significant.

Cumulative Construction Impacts

The construction of the proposed project may overlap with the construction of other development projects, including land use developments at 888 North Point Street and 400 Bay Street, which are both within 0.3 mile of the project site. Given the limited amount and number of development projects that may overlap with proposed project construction, construction activities would not be expected to result in significant cumulative construction-related transportation impacts.

Localized construction-related transportation impacts could occur as a result of cumulative projects that generate increased traffic at the same time and on the same streets as the proposed project. However, as

[45] CFW 55 Owner, LLC, *Transportation Demand Management Plan Application for 1300 Columbus Avenue*, March 7, 2017.

previously stated, the construction manager for each cumulative project would be required to work with the various city departments to ensure that construction contractors comply with Blue Book regulations and other codes, which would address construction vehicle routing, traffic control, and movement of people walking and bicycling adjacent to the construction area. Similar to the proposed project, sponsors and construction managers of cumulative development projects would be required to coordinate with various city departments such as SFMTA and public works, and coordinate any temporary sidewalk and travel lane closures through the transportation advisory staff committee to develop coordinated plans that would address construction-related vehicle routing, traffic control, and movements of people walking adjacent to the construction area for the duration of construction overlap.

Therefore, 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 construction-related transportation impacts.

Cumulative Traffic Hazard Impacts

The future land use developments and proposed transportation network changes described above are not anticipated to result in substantial changes to traffic circulation that could lead to traffic hazards. Furthermore, future land use developments or changes to the transportation network associated with other plans or projects would be evaluated to ensure that any associated design features or activities would not result in significant traffic hazard impacts. The proposed project would generate an estimated 91 additional weekday p.m. peak hour vehicle trips. These vehicle trips are included in cumulative (2040) traffic volumes at the study intersections. Increases in vehicles, including those to and from the proposed project, could result in the potential for increased vehicle-vehicle conflicts, but the increased potential for conflicts would not be considered new or represent a substantial worsening of a traffic hazard, and would not result in significant cumulative traffic hazard impacts. Therefore, the proposed project in combination with past, present and reasonably foreseeable developments in San Francisco, would result in less-than-significant cumulative traffic hazards.

Cumulative Pedestrian Impacts

Pedestrian circulation impacts by their nature are site-specific and generally do not contribute to impacts from other development projects. Pedestrian trips may increase between the completion of the proposed project and future conditions due to increasing effectiveness of planned pedestrian improvements in the vicinity of the project site. As described above, the proposed project would not result in overcrowding of sidewalks or create new potentially hazardous conditions for pedestrians under project conditions and therefore would not create such conditions in the cumulative setting. The proposed project's 418 p.m. peak hour walk trips, together with the pedestrian trips associated with these additional cumulative projects, would not combine to create a significant cumulative impact.

Vehicle trips throughout the city are likely to increase under cumulative conditions due to general population and job growth. However, there would be no significant increase in vehicle conflicts with people walking in the project vicinity as a result of project vehicle trips in combination with trips from reasonably foreseeable other projects as the proposed project would not include an additional driveway or curb cut.

Thus, the proposed project is not likely to create potentially hazardous conditions for people walking, or otherwise interfere with accessibility to the project site and Columbus Avenue, North Point Street, Jones Street, Leavenworth Street and Beach Street adjacent to the project site. Therefore, there would be no significant cumulative impacts on people walking.

Cumulative Bicycle Impacts

The proposed project would not introduce any design features that would eliminate or impede access to existing bicycle routes in the study area. The proposed project would not include any additional onsite vehicular parking spaces and there is no additional project driveway; therefore, the proposed project would not introduce a new conflict point, or intensify an existing conflict point, between people bicycling and people driving vehicles. Also, the project would reduce the width of the driveways on Columbus Avenue and North Point Street.

Bicycle trips throughout the city may increase under 2040 cumulative conditions due to general growth. As discussed above, the proposed project would generate 24 bicycle trips during the weekday p.m. peak hour. The project-generated bicycle trips would not be considered substantial, and they are expected to be accommodated by the existing bicycle facilities in the project vicinity, as well as the bicycle parking proposed at the project site.

Vehicle trips throughout the city may also increase under cumulative conditions due to general growth in population and jobs. This would result in an increase in the potential for bicycle-vehicle conflicts in the study area. However, the proposed project would not add or intensify a conflict point (e.g., additional curb cut) along an existing or planned bicycle route. The proposed project's trips, in combination with other projects and cumulative growth, would not be considerable enough to create potentially hazardous conditions for people bicycling or otherwise interfere with accessibility of people bicycling 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 not contribute considerably to a significant cumulative impacts on people bicycling.

Cumulative Transit Impacts

By 2040, ridership levels on Muni lines are projected to generally grow faster than increases in capacity, and overall p.m. peak hour ridership, as a percentage of overall capacity, would increase from existing conditions which may cause significant cumulative impacts on local and regional transit. However, the proposed project would generate a total of 173 p.m. peak transit trips out of a total cumulative demand of 31,282 trips, or 0.55 percent of total cumulative growth.[46] Under 2040 cumulative conditions, the BART line to the East Bay would have a capacity utilization of 112 percent during the weekday p.m. peak hour,[47] and would therefore operate above the regional standard utilization standard of 100 percent. This is a significant cumulative transit impact. However, the proposed project transit trips would not contribute

[46] San Francisco Planning Department, Memorandum: Transit Data for Transportation Impact Studies, May 15, 2015.

[47] San Francisco Planning Department, Memorandum: Updated BART Regional Screenlines – Revised, October 2016.

considerably to BART capacity utilization exceeding the 100 percent standard, in part because the 173 p.m. peak transit trips added represent a small percentage increase and would likely be distributed among various transit lines. Therefore, the proposed project would not contribute considerably to cumulative impacts on regional transit. As such, the proposed project's addition of 173 p.m. peak transit trips would not represent a considerable contribution to significant cumulative transit impacts and this impact would be less-than-significant.

Cumulative VMT Impacts

VMT by its nature is a cumulative impact. The amount of driving induced by past, present and future projects contributes to cumulative environmental impacts associated with VMT. While no single project would be sufficient in size to prevent the region or state from meeting its VMT reduction goals, a project's individual VMT would contribute to cumulative VMT impacts. Project-level VMT and induced automobile travel screening thresholds are based on levels at which new projects are not anticipated to conflict with state and regional long-term greenhouse gas emission reduction targets and statewide VMT per capita reduction targets set for 2020.

As shown in **Table 3**, p. 40, 2040 average daily VMT per capita for residential uses in TAZ 852 is four miles, which is 75 percent below the projected 2040 regional average daily VMT per capita of 16.1. Similar to existing conditions, the project site is located in an area where VMT is greater than 15 percent below the projected 2040 regional average, the proposed project's residential and retail uses would not result in substantial additional VMT. Therefore, the proposed project's residential and retail uses would not contribute considerably to any substantial cumulative increase in VMT.

Cumulative Loading Impacts

Loading impacts by their nature are site-specific and generally do not contribute to impacts from other development projects; although several development projects are proposed within the vicinity of the project site.

Cumulative loading impacts would be similar to loading impacts experienced under existing plus project conditions. The proposed project, in combination with the existing hotel portion, would generate demand for three and four loading vehicles during the average hour and peak loading hour, respectively. This demand is expected to be accommodated by the two loading spaces in the rear alley. If additional spaces are required for loading, the 73-foot loading zone adjacent to the alley on Beach Street would be utilized for loading. Therefore, the proposed project would not result in a significant cumulative loading impact.

Cumulative Parking Impacts

Parking impacts by their nature are site-specific and generally do not contribute to impacts from other development projects unless the available parking supply is inadequate and causes motorists to search for available parking, such that potentially hazardous conditions are created within the circulation system. However, like the proposed project, cumulative development projects would be required to meet City parking requirements and ensure that the demand for parking is reduced to the extent feasible. Therefore, the proposed project would not result in a significant cumulative parking impact.

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

The project site is not within the vicinity of a private airstrip or within 2 miles of a public airport or public use airport, therefore, Topic E.6(c) is not applicable. The following relies on the *environmental noise and vibration impact assessment* prepared for the proposed project, unless otherwise noted.[48]

Impact NO-1: Construction activities associated with the proposed project could result in a significant temporary increase in ambient noise levels in the project vicinity in excess of established standards. (Less than Significant with Mitigation)

Construction noise is regulated by the City of San Francisco Municipal Code (sections 2907 and 2908 of the police code). Section 2907 of the police code requires that noise levels from individual pieces of construction equipment, other than impact tools, not exceed 80 dBA at a distance of 100 feet from the source. Impact tools are not subject to the equipment noise limit provided that impact tools and equipment have intake and exhaust mufflers recommended by the manufacturers thereof and are approved by the Director of Public Works or the Director of Building Inspection as best accomplishing maximum noise attenuation, and that pavement breakers and jackhammers are also equipped with acoustically attenuating shields or shrouds recommended by the manufacturers thereof and approved by the Director of Public Works or the Director of Building Inspection as best accomplishing maximum noise attenuation. Section 2908 of the police code prohibits construction work between 8 p.m. and 7 a.m., if noise would exceed the ambient noise level by 5 dBA at the project property line, unless a special permit is authorized by the Director of Public Works or the Director of Building Inspection. In addition to the construction noise regulations promulgated in the City's noise ordinance (sections 2907 and 2908), additional criteria of 10 decibels (dB) above the ambient noise level and noise level greater than 90 dBA are also used by the planning department to assess

[48] Charles M. Salter Associates, Inc., *1300 Columbus Avenue Environmental Noise and Vibration Impact Assessment*, October 2019.

substantial temporary ambient noise level increases. These criteria apply at the property lines of the nearest sensitive receptors.

Construction of the proposed project would occur over a 16-month period and major construction phases are expected to include demolition and site preparation, construction of the foundation, paving, building construction, and architectural coatings. In addition, construction would include structural framing, exterior finishes, interior framing, and interior finishes. The noisiest of these activities are typically demolition, ground clearing, construction of the foundation, shoring, and framing when heavy machinery would be in use and exterior construction would occur. According to the project sponsor, demolition, ground clearing, and excavation phases would involve the use of concrete saws, cranes, heavy machinery such as tractors and excavators, and micropile drills. The foundation and structural phases would include the use of forklifts, compressors, saws, and generators. Framing would involve the use of pneumatic tools, such as nail guns, and other hand tools, such as hammers and saws. The final phase would consist of interior work, which is typically less intrusive since the noise would occur indoors after the building shell is in place. No nighttime construction would occur for the proposed project.

Table 4, Representative Construction Equipment Noise Levels, lists typical construction equipment noise levels (L_{max}), based on a distance of 50 feet between the equipment and a noise receptor, obtained from the Federal Highway Administration Roadway Construction Noise Model. Construction of the entire project would be conducted in sequential phases and each phase would use different pieces of construction equipment. The noise-producing equipment for each construction phase as defined by the project sponsor are shown in **Table 5, Proposed Project Construction Phases and Equipment**.

The proposed project would be required to comply with regulations set forth in the noise ordinance, (sections 2907 and 2908 of the police code), as discussed above. The building inspection department is responsible for enforcing the noise ordinance for private construction projects during normal business hours (8 a.m. to 5 p.m.). The police department is responsible for enforcing the noise ordinance during all other hours. The project's consistency with the regulations set forth in sections 2907 and 2908 of the noise ordinance is described below.

Construction noise levels were quantified in the environmental noise and vibration impact assessment prepared for the project[49] by assessing all planned construction equipment for each construction phase operating simultaneously to generate the maximum expected noise level at the nearby sensitive receptors, as shown in **Table 6, Construction Noise Levels at Sensitive Receptors**, p. 59. Although this condition is unlikely to occur, it was evaluated as a worst-case condition. Therefore, construction noise levels shown in **Table 6** are considered the expected maximum noise levels rather than expected typical noise levels. **Table 6** summarizes construction noise levels at each of the nearest sensitive receptors for each construction phase with and without temporary construction barriers based on construction noise levels for the planned construction equipment. Noise levels in **Table 6** shown in double underline exceed one of the City's construction noise criterion (10 dB above the ambient noise level) with and without the barrier. As shown in **Table 6**, construction of the proposed project would exceed this noise criteria during multiple phases, which would result in a potentially significant impact.

[49] Ibid.

Table 4: Representative Construction Equipment Noise Levels

Construction Equipment[1]	L_{max} at 50 feet (dBA)	L_{max} at 100 feet (dBA)
Aerial Lifts	75	69
Air Compressors	78	72
Bore/Drill Rigs	84	78
Cement and Mortar Mixers	79	73
Concrete/Industrial Saws	90	84
Cranes	81	75
Dumpers/Tenders	76	70
Excavators	81	75
Pavers	77	71
Paving Equipment[2]	85	79
Plate Compactors	83	77
Pressure Washers[2]	82	76
Rollers	80	74
Rough Terrain Forklifts	84	78
Skid Steer Loaders[3]	79	73
Sweepers/Scrubbers[4]	82	76
Welder	74	78

Source: Federal Highway Administration, Roadway Construction Noise Model User's Guide, 2006, *http://www.fhwa.dot.giv/environment/noise/construction_noise/rcnm/rcnm.pdf*.

Notes:

1 The construction equipment list in this table has been provided by the project sponsor.

2 Represented by "all other equipment > 5 HP" from user's guide.

3 Represented by "vacuum street sweeper" from user's guide.

4 Represented by "front-end loader" from user's guide.

Table 5: Proposed Project Construction Phases and Equipment

Construction Phase	Equipment	
Site Preparation	Bore/Drill Rigs (1) Dumpers/Tenders (4) Pavers (1) Paving Equipment (2) Plate Compactors (4)	Pressure Washers (1) Rollers (1) Skid Steer Loaders (2) Sweepers/Scrubbers (1)
Foundations	Bore/Drill Rigs (1) Cement and Mortar Mixers (12) Concrete/Industrial Saws (2) Cranes (1)	Excavators (1) Plate Compactors (4) Welders (1)
Building Construction	Aerial Lifts (2) Air Compressors (2) Cranes (1) Dumpers/Tenders (2)	Pressure Washers (1) Rough Terrain Forklifts (1) Welders (1)
Finishes	Cement and Mortar Mixers (12)	

Source: CFW Owner, LLC, Construction Phasing Memorandum to the San Francisco Planning Department, January 29, 2019.

Table 6: Construction Noise Levels at Sensitive Receptors

Sensitive Receptor	Construction Noise Level at Receptors Property Line (dBA)								Criterion (dBA)
	Site Phase		Foundation Phase		Building Phase		Finishes Phase		
	No Barrier	With Barrier	No Barrier	With Barrier	No Barrier	With Barrier	No Barrier	With Barrier	
580 Beach Street	76	67	76	67	71	63	72	64	67
505 Beach Street and 550 Beach Street	65	65	64	64	61	61	62	62	
495 Beach Street	83	72	83	72	79	68	80	69	71
1250 Columbus Avenue	86	71	85	70	82	67	83	68	
704 North Point Street	85	70	85	69	81	66	82	67	65

Source: Charles M. Salter Associates, Inc., October 2019.

Implementation of **Mitigation Measure M-NO-1, Construction Noise Controls,** would require implementation of site-specific measures to reduce construction noise levels and reduce potential effects from construction noise on existing nearby noise-sensitive receptors, among them installing a 12-foot-high temporary noise barrier during project construction, as shown in **Figure 13, Location of Recommended Construction Noise Barrier**, p. 61.[50] This mitigation measure provides numerous other controls intended to reduce construction noise to the extent feasible.

Mitigation Measure M-NO-1: Construction Noise Controls

The project sponsor shall develop a set of site-specific noise attenuation measures under the supervision of a qualified acoustical consultant to ensure that maximum feasible noise attenuation will be achieved for the duration of construction activities. Prior to commencement of demolition and construction activities, the project sponsor shall submit the construction noise control plan to the San Francisco Planning Department for review and approval. Noise attenuation measures shall be implemented to meet a goal of not increasing noise levels from construction activities by more than 10 dBA above the ambient noise level at sensitive receptor locations. Noise measures may include, but are not limited to, those listed below. The project sponsor or the project sponsor's contractor shall comply with the following:

1. The construction contractor shall install a 12-foot-high temporary construction barrier to reduce construction noise consistent with the location of the recommended barrier as shown in Figure 13 of the initial study, Figure 2 of the environmental noise and vibration impact assessment and plan sheet A2.1a of the planned unit development application.

[50] Charles M. Salter Associates, Inc., *1300 Columbus Avenue Environmental Noise and Vibration Impact Assessment*, Figure 2, October 2019.

2. The construction contractor shall conduct noise monitoring within the first week of major construction phases (e.g., demolition, excavation) to determine the effectiveness of noise-attenuation measures and need for additional measures.

3. The construction contractor shall post signs onsite pertaining to permitted construction days and hours and shall specify complaint procedures, including whom to notify in the event of a noise-related problem, with telephone numbers listed.

4. The construction contractor shall notify the neighbors in advance of the schedule for each major phase of construction and expected loud activities including estimated duration of activity, construction hours, and contact information.

5. The construction contractor shall avoid placing stationary noise-generating equipment (e.g., generators, compressors) within noise-sensitive buffer areas (measured at linear 20 feet) between immediately adjacent neighbors.

6. Where the use of pneumatically powered tools is unavoidable, an exhaust muffler on the compressed air exhaust shall be used, along with external noise jackets on the tools.

7. All construction equipment shall be in good working order and mufflers should be inspected to ensure they function properly. Unnecessary idling of equipment and engines shall be avoided.

As shown in **Table 6**, p. 59, even with implementation of Mitigation Measure M-NO-1, construction noise may exceed one of the City's construction noise criterion - 10 dB above the ambient noise level - for certain pieces of equipment operating simultaneously, as analyzed. However, such exceedances would be temporary, intermittent in nature, and would largely be limited to the initial phases of construction (i.e., site preparation and foundation installation, which would last approximately three months). In addition, construction noise would be limited to the extent feasible with compliance of police code sections 2907 and 2908. This, in combination with implementation of Mitigation Measure M-NO-1, would ensure that project related construction activities would not expose individuals to temporary increases in noise levels substantially greater than ambient levels and this impact would be less than significant.

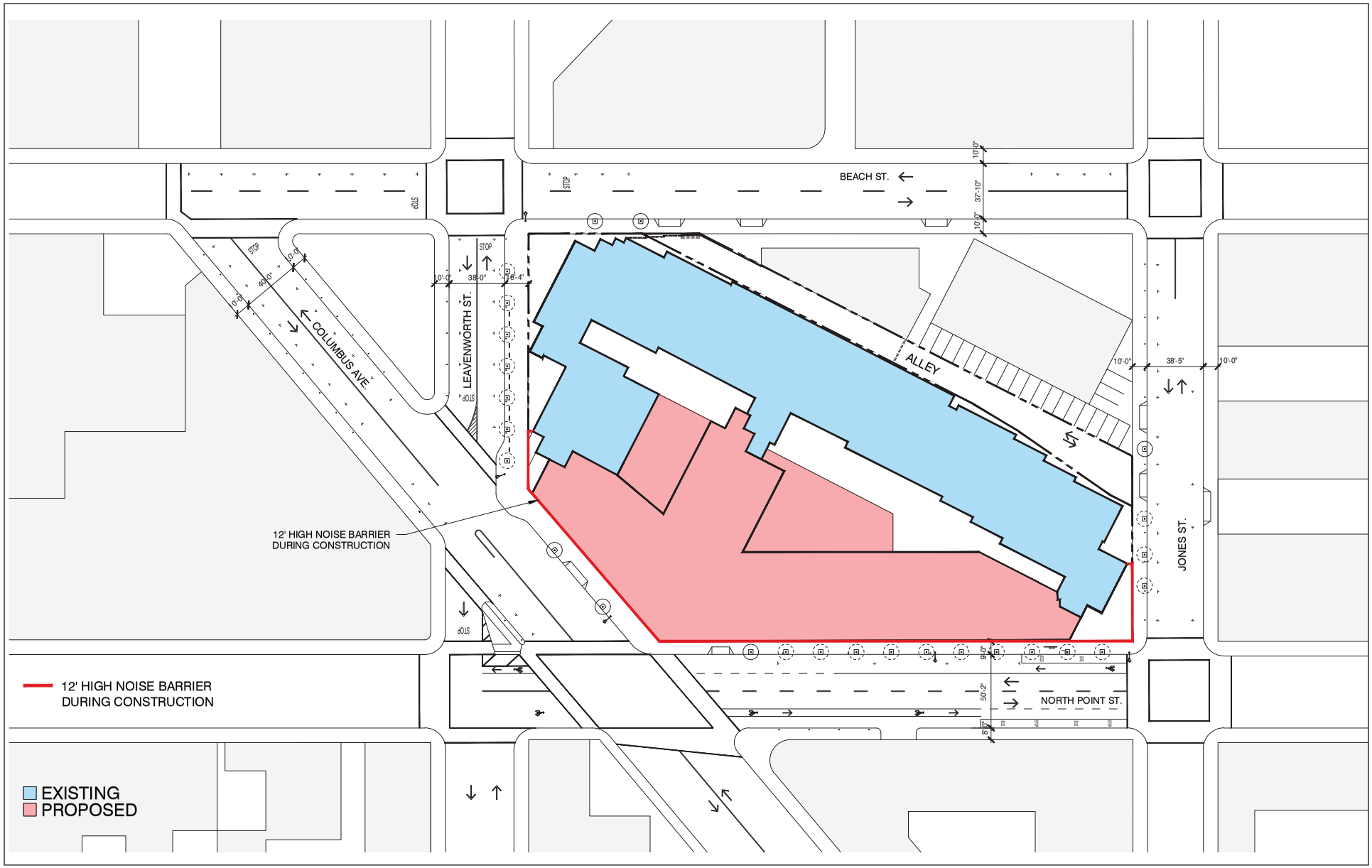

FIGURE 13

1300 Columbus Avenue Project
Location of Recommended Construction Noise Barrier

SOURCE: AXIS/GFA, OCTOBER 28, 2019.

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Impact NO-2: Construction of the proposed project could generate excessive groundborne noise or vibration levels. (Less than Significant with Mitigation)

Vibration refers to groundborne noise and perceptible motion. Groundborne vibration is almost exclusively a concern inside buildings and is rarely perceived as a problem outdoors. Vibration energy propagates from a source, through intervening soil and rock layers, to the foundations of nearby buildings. The vibration then propagates from the foundation throughout the remainder of the structure. Building vibration may be perceived by the occupants as the motion of building surfaces, rattling of items on shelves or hanging on walls, or as a low-frequency rumbling noise. The rumbling noise is caused by the vibrating walls, floors, and ceilings radiating sound waves. Annoyance from vibration often occurs when the vibration exceeds the threshold of perception by 10 dB or less. This is an order of magnitude below the damage threshold for normal buildings. To distinguish vibration levels from noise levels, the unit is written as "vibration velocity decibels" (VdB). Human perception of vibration starts at levels as low as 67 VdB and sometimes lower. Annoyance due to vibration in residential settings starts at approximately 70 VdB. Groundborne vibrations are almost never annoying to people who are outdoors. Although the motion of the ground may be perceived, without the effects associated with the shaking of the building, the motion does not provoke the same adverse human reaction.

Typical sources of groundborne vibration are construction activities (e.g., pavement breaking and operating heavy-duty earthmoving equipment) and occasional traffic on rough roads. In general, groundborne vibration from standard construction practices is considered when occurring within 25 feet of sensitive uses. When construction is occurring within 25 feet of sensitive uses, groundborne vibration levels very rarely reach levels that can damage structures; however, these levels are perceptible and could result in potential annoyance to residents and workers near the active construction site. With the exception of buildings built prior to the 1950s or buildings of historic significance, potential structural damage from heavy construction activities rarely occurs. When roadways are smooth, vibration from traffic (even heavy trucks) is rarely perceptible.

Construction of the proposed project could result in the generation of groundborne vibration. Nearby vibration-sensitive receptors include immediately adjacent buildings and the Pacific Vision Institute, an eye surgery center, located at 505 Beach Street. This construction vibration impact analysis discusses the level of human annoyance using vibration levels in VdB and assesses the potential for building damage using vibration levels in peak particle velocity (PPV inches per second [(in/sec]) because vibration levels calculated in root-mean-square are best for characterizing human response to building vibration, while vibration level in PPV is best used to characterize potential for damage.

The ASHRAE Engineers Handbook[51] provides vibration criteria for vibration-sensitive equipment, citing the Institute of Environmental Sciences and Technology.[52] Based on this document, the "recommended

[51] ASHRAE Handbook 2015, *https://www.ashrae.org/technical-resources/ashrae-handbook*.

[52] ASHRAE Handbook 2015; Chapter 48 Noise and Vibration Control; Table 45.

acceptable" criterion for eye surgery equipment is a vibration PPV of 0.001 in/sec, which was used as the criterion of significance for project impacts to the nearby eye surgery facility at 505 Beach Street.

In addition, the vibration guidelines for potential damage to structures as outlined in the Caltrans Vibration Guidance Manual are shown in **Table 7, Vibration Guidelines for Potential Damage to Structures**. Based on San Francisco Planning Department property information,[53] this analysis assumes the structure type and condition of buildings adjacent to the project site as listed in **Table 8, Assumed Type and Condition of Nearby Structures**.

Table 7: Vibration Guidelines for Potential Damage to Structures

Structure Type and Condition	Maximum Peak Particle Velocity (PPV, in/sec)	
	Transient Sources[1]	Continuous/Frequent Intermittent Sources[2]
Extremely fragile historic buildings	0.12	0.008
Fragile buildings	0.20	0.10
Historic and some old buildings	0.50	0.25
Older residential structures	0.50	0.30
New residential structures	1.0	0.50
Modern/industrial commercial buildings	2.0	0.50

Source: California Department of Transportation, Vibration Guidance Manual, Table 19. September 2013.
Notes:

[1] Transient sources create a single, isolated vibration event (e.g., blasting or drop balls).

[2] Continuous/frequent intermittent sources include impact pile drivers, pogo-stick compactors, crack-and-seat equipment, vibratory pile drivers, and vibratory compaction equipment.

Table 8: Assumed Type and Condition of Nearby Structures

Structure	Structure Type and Condition	Vibration Velocity Criterion (in/sec)
2801 Leavenworth Street	Historic and some old buildings	0.25
505 Beach Street 555 Beach Street 580 Beach Street 1250 Columbus Avenue 1303 Columbus Avenue 1321 Columbus Avenue 1323 Columbus Avenue 1325 Columbus Avenue 704 North Point Street	Older residential structures	0.30
495 Beach Street	New residential structures	0.50
1255 – 1275 Columbus Avenue	Modern industrial/commercial buildings	0.50

Source: Charles M. Salter Associates, Inc., October 2019.

[53] San Francisco Planning Department Property Information Map, sfplanninggis.org/pim/ (accessed April 2019).

The use of micropiles and other construction equipment equivalent to loaded trucks during project construction would generate vibration. Most of the construction vibration from the proposed project would be considered "continuous/frequent," as opposed to intermittent. No impact or vibratory pile driving would be used for project construction and rollers would not result in groundborne vibration.

Construction vibration levels generated from construction equipment were calculated up to the nearest building structure from the construction activity using the formula for vibration transmission shown below. PPV_{ref} is the reference vibration level at 25 feet. *D* is the distance from equipment to receptor in feet, and *n* is the vibration attenuation rate through the ground. Based on the project's *preliminary geotechnical investigation*,[54] the *n* value of 1.5 was used.

$$PPV_{equip} = PPV_{ref} \times (25/D)^{n}$$

Table 9, Construction Equipment Vibration Levels, shows that micropiles would generate a vibration level of 0.089 PPV (in/sec), at a distance of 25 feet. As also shown in **Table 9**, other construction equipment (equivalent to loaded trucks) would generate a vibration level of 0.076 PPV (in/sec), at a distance of 25 feet.

Table 9: Construction Equipment Vibration Levels

Equipment	Reference PPV at 25 feet (in/sec)
Micropile Drill Rig[1]	0.089
Loaded Truck[2]	0.076

Source: Charles M. Salter Associates, Inc., October 2019.

Notes:

1 A vibration level of 0.089 PPV (in/sec) at 25 feet for caisson drilling from the Caltrans Transportation and Construction Vibration Guidance Manual (September 2013) was assumed to be similar to micropile drilling.

2 Other pieces of construction equipment other than micropile drilling was assumed to generate a vibration level of up to 0.076 PPV (in/sec) at 25 feet, which is similar to loaded trucks from the Caltrans Transportation and Construction Vibration Guidance Manual (September 2013).

Table 10, Construction Vibration Levels, lists the projected vibration levels from the construction equipment to the nearest building structure. As shown in **Table 10**, construction vibration levels would exceed the vibration threshold of 0.001 PPV (in/sec) for eye surgery equipment at the Pacific Vision Institute (505 Beach Street) building, while vibration levels would not exceed the vibration damage threshold of 0.25 PPV (in/sec) for 2801 Leavenworth Street or the threshold of 0.3 PPV (in/sec) for any of the older residential structures listed in **Table 8**, p. 64, including 555 and 505 Beach Street. Given that vibration levels would be exceeded at the Pacific Visions Institute, project construction could result in a potentially significant impact.

54 Rockridge Geotechnical, *Preliminary Geotechnical Investigation Proposed Hotel Addition Fisherman's Wharf Holiday Inn 1300 Columbus Avenue*, May 21, 2018.

Table 10: Construction Vibration Levels

Property	Structure Type	Construction Equipment	Reference Vibration Level (PPV) at 25 feet	Distance (feet) to Building Structure	Vibration Level (PPV)	Vibration Threshold (PPV)[1, 2]	Exceed Vibration Threshold?
505 Beach Street (Pacific Vision Institute)	Building with Sensitive Medical Equipment	Micropile Drill Rig	0.089	115	0.009	0.0011	Yes
		Loaded Truck	0.076	35	0.046	0.0011	Yes
555 Beach Street	Older Residential Structure	Micropile Drill Rig	0.089	20	0.124	0.32	No
		Loaded Truck	0.076	20	0.106	0.32	No
505 Beach Street	Older Residential Structure	Micropile Drill Rig	0.089	35	0.054	0.32	No
		Loaded Truck	0.076	35	0.046	0.32	No

Source: Charles M. Salter Associates, Inc., October 2019.

Notes:

[1] The "recommended acceptable" criterion for eye surgery equipment is 0.001 peak particle velocity (PPV) inches per second (in/sec) based on the ASHRAE Engineers Handbook (ASHRAE 2015).

[2] The vibration damage threshold for older residential structures is 0.3 PPV (in/sec) based on the Caltrans Transportation and Construction Vibration Guidance Manual (September 2013).

To reduce vibration impacts from project construction activities at 505 Beach Street to a less-than-significant level, the project sponsor would be required to implement **Mitigation Measure M-NO-2, Construction Vibration Control,** which would require the project construction contractor to avoid vibration-generating construction activities on Wednesdays between the hours of 8 a.m. and 12 p.m. when laser eye surgery is performed.

Mitigation Measure M-NO-2: Construction Vibration Control

The project sponsor or the project sponsor's contractor shall prohibit vibration-generating construction activities on Wednesdays between the hours of 8 a.m. and 12 p.m., when laser eye surgery is performed at 505 Beach Street (Pacific Vision Institute).

Additionally, a community liaison shall be designated and made available to respond to vibration-related complaints from building occupants at Pacific Vision Institute. Contact information for the community liaison shall be posted in a conspicuous location so that it is clearly visible to building occupants most likely to be disturbed. Through the community liaison, the project sponsor shall provide notification to property owners and occupants of Pacific Vision Institute of construction activities involving equipment that can generate vibration capable of interfering with vibration-sensitive equipment 10 days prior to the start of project construction, informing them of the estimated start date and duration of vibration-generating construction activities. These equipment types include a large bulldozer, or similar equipment, operating within 135 feet of the building; a jackhammer operating within 75 feet of the building; or a loaded truck operating within 125 feet of the building. The community liaison shall manage concerns and complaints resulting from construction vibration. Reoccurring disturbances shall be evaluated by a qualified noise and

vibration consultant to ensure that there are no exceedances of the 0.0011 PPV vibration level threshold for vibration-sensitive equipment.

Implementation of Mitigation Measure M-NO-2 would reduce construction-related vibration levels and the potential effects from construction vibration on the vibration-sensitive receptor at 505 Beach Street. As such, impacts related to construction vibration would be reduced to a less-than-significant level.

Impact NO-3: Operation of the proposed project could result in a substantial permanent increase in ambient noise levels in the project vicinity in excess of applicable standards. (Less than Significant with Mitigation)

An environmental noise and vibration impact assessment[55] was prepared for the proposed project which included an evaluation of the existing ambient noise environment and expected future proposed project noise and vibration sources. The following discussion is based on the findings of this study.

To quantify the ambient noise environment at the project site, three continuous long-term noise measurements were conducted between March 29, 2019 and April 2, 2019; the noise monitoring locations (LT-1, LT-2, and LT-3) are identified in **Figure 14, Noise Measurement Locations**, p. 69. The minimum L_{eq} (10 min) during the entire measurement period at the monitor locations ranged from 48 dBA to 51 dBA. Based on these measurements, the police code section 2909(b) criteria for ambient noise measurements at the different property planes (i.e., the ambient noise level plus 8 dBA) range from 56 dBA to 59 dBA. The measured ambient noise levels are shown in **Table 11, Measured Ambient Noise Levels (Entire Measurement Period)**. The minimum L_{eq} (10 min) between 7 a.m. and 8 p.m. (i.e., the daytime construction period) ranged from 55 dBA to 61 dBA at the measurement locations, as shown in **Table 12, Measured Ambient Noise Levels (Between 7 a.m. and 8 p.m.)**.

Table 11: Measured Ambient Noise Levels (Entire Measurement Period)

Measurement Location	Date/Time	Noise Level, Minimum L_{eq} (10 minutes)	Police Code Section 2909(b) Criterion[1]
LT-1 (South Property Plane)	04-01-2019 2:00 a.m.	49 dBA	57 dBA
LT-2 (West Property Plane)	04-02-2019 2:20 a.m.	48 dBA	56 dBA
LT-3 (North and Northwest Property Planes)	03-30-2019 3:40 a.m.	51 dBA	59 dBA

Source: Charles M. Salter Associates, Inc., October 2019.

Notes:

[1] The ambient noise level plus 8 dBA.

[55] Charles M. Salter Associates, Inc., *1300 Columbus Avenue Environmental Noise and Vibration Impact Assessment*, October 2019.

Table 12: Measured Ambient Noise Levels (Between 7 a.m. and 8 p.m.)

Measurement Location	Date/Time	Noise Level Minimum L_{eq} (10 minutes)
LT-1 (South Property Plane)	03-31-2019 7:20 a.m.	61 dBA
LT-2 (West Property Plane)	03-31-2019 7:00 a.m.	55 dBA
LT-3 (North and Northwest Property Planes)	03-30-2019 7:30 a.m.	57 dBA

Source: Charles M. Salter Associates, Inc., October 2019.

Ambient noise levels in the vicinity of the project site are typical of noise levels in neighborhoods in San Francisco, which are dominated by vehicular traffic, including trucks, cars, Muni buses and light rail vehicles, emergency vehicles, and land use activities such as commercial businesses and periodic temporary construction-related noise from nearby development, or street maintenance. An approximate doubling in traffic volumes in the area would be necessary to produce an increase in ambient noise levels that would be barely perceptible to most people (3 dB increase).[56]

Traffic Noise

The proposed project would generate 2,412 daily vehicle trips.[57] These trips would be dispersed on nearby roadways. The additional vehicle trips added by the proposed project would not double vehicle trips on any nearby roadways. Therefore, operation of the project would not result in a substantial permanent increase in ambient traffic noise.

Mechanical Equipment Noise

Section 2909 of the noise ordinance regulates noise from mechanical equipment and other similar sources. This includes electrical equipment (transformers, emergency generators) as well as mechanical equipment that is installed on commercial/industrial and residential properties. Section 2909 states in subsection (b) that mechanical equipment operating on commercial or industrial property must not produce a noise level more than 8 dBA above the ambient noise level at the property plane. Section 2909 also states in subsection (d) that no fixed (permanent) noise source (as defined by the noise ordinance) may cause the noise level inside any sleeping or living room in a dwelling unit on residential property to exceed 45 dBA between 10 p.m. and 7 a.m. or 55 dBA between 7 a.m. and 10 p.m. when windows are open, except where building ventilation is achieved through mechanical systems that allow windows to remain closed.

[56] With respect to traffic noise, a 3 dBA increase is barely perceptible to people, while a 5 dBA increase is readily noticeable. An increase of less than 3 dBA is generally not perceptible outside of controlled laboratory conditions.1 Traffic noise typically produces a noticeable increase in noise (i.e., 3 db) when there is a doubling of the existing traffic volumes on a roadway. California Department of Transportation, Technical Noise Supplement to the Traffic Noise Analysis Protocol, pp. 2-44 and 2-45, September 2013, *http://www.dot.ca.gov/hq/env/noise/pub/TeNS_Sept_2013B.pdf*, accessed: October 30, 2018.

[57] It should be noted that trip generation estimates are considered to be conservative given that the retail use category was assumed to be a fast food restaurant, which has a high travel demand. Because it is unlikely that a fast food operator would occupy the retail space, the actual number of daily vehicle trips is likely to be lower than estimated.

FIGURE 14

0 100 200
FEET

N

SOURCES: GOOGLE EARTH; CHARLES M. SALTER ASSOCIATES, INC., OCTOBER 2019.

1300 Columbus Avenue Project
Noise Measurement Locations

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The proposed project would include rooftop mechanical equipment that would produce operational noise including the proposed heating, ventilation and air conditioning units (HVAC). These noise sources would be subject to the San Francisco Noise Ordinance (article 29 of the police code). Section 2909 (d) establishes maximum noise levels for these fixed noise sources of 55 dBA (from 7 a.m. to 10 p.m.) and 45 dBA (from 10 p.m. to 7 a.m.) inside any sleeping or living room in any dwelling unit located on a residential property to prevent sleep disturbance.

Although the final quantity and type of rooftop mechanical equipment have not been determined at this stage of the project, the operational noise analysis assumed one rooftop light commercial air-conditioning unit, two rooftop large commercial air-conditioning units, and 29 rooftop exhaust fans to be operating simultaneously at the quietest time of the day for the purpose of the noise assessment. The location of this equipment was assumed to be the lower roof, as shown on **Figure 10**, p. 16.

Table 13, Rooftop Mechanical Equipment Noise Levels, shows the calculated mechanical noise levels at the property planes and the City's noise ordinance criteria. As shown in **Table 13**, mechanical noise levels would not exceed the City's noise ordinance criterion. Therefore, exterior noise impacts from the operation of the proposed rooftop mechanical equipment would be less than significant at the project's property planes.

Table 13: Rooftop Mechanical Equipment Noise Levels

Property Plane	Noise Level (dBA)	Noise Criterion (dBA)
North	45	59
West	50	56
Southwest	53	56
South	55	57
East	47	57
Northeast	51	59

Source: Charles M. Salter Associates, Inc., October 2019.

In addition, interior noise levels generated by the proposed rooftop mechanical equipment at the nearest noise-sensitive receptors were calculated. At 1321 Columbus Avenue (the nearest residential building), interior noise levels generated by rooftop mechanical equipment were calculated to be 30 dBA and at 580 Beach Street (the nearest hotel building) noise levels generated by rooftop mechanical equipment were calculated to be 29 dBA, based on windows open at the building facade. Accordingly, the interior noise levels would not exceed the City's nighttime (10 p.m. and 7 a.m.) interior noise ordinance criterion of 45 dBA for off-site bedrooms and living rooms. As such, interior noise impacts from operation of the proposed rooftop mechanical equipment would be less than significant. Therefore, noise generated by rooftop mechanical equipment at property planes and at nearest noise-sensitive receptors would have a less-than-significant impact.

Rooftop Deck Amplified Noise

The proposed project would include a rooftop deck that would provide open space amenities for hotel guests and may also be used for private events. Music and other amplified noise at the rooftop deck would

be subject to sections 2909(b) and (d) in the City's noise ordinance, which require that mechanical equipment operating on commercial or industrial property must not produce a noise level more than 8 dBA above the ambient noise level at the property plane and that no fixed (permanent) noise source (as defined by the noise ordinance) may cause the noise level inside any sleeping or living room in a dwelling unit on residential property to exceed 45 dBA between 10 p.m. and 7 a.m. or 55 dBA between 7 a.m. and 10 p.m. when windows are open, except where building ventilation is achieved through mechanical systems that allow windows to remain closed. Noise generated by people is exempt.

As proposed by the project, the rooftop deck would be located near the northwest corner of the project site, near Beach Street. The rooftop deck would be located at least 12 feet from the northern property plane and would include a 6-foot-high glazed parapet at the perimeter. Based on noise measurement data collected by LSA for other similar projects, unrestricted amplified sound could result in noise levels of up to 92 dBA L_{max} at 25 feet. If operated unrestricted, this impact would be potentially significant.

The project speakers for amplified sound would be located at a maximum height of 3 feet above the rooftop deck, as required by **Mitigation Measure M-NO-3: Rooftop Deck Noise Controls**, below. For the purpose of this noise assessment, the rooftop deck hours of operation were assumed to occur between 12 p.m. and 12 a.m. because the rooftop deck hours of operation have not yet been established. The minimum L_{eq} (10 min) measured at Location LT-3, which is located at the north and northeast property plane as identified in **Figure 14**, p. 69 during this period was 55 dBA. Therefore, because the noise ordinance criterion specifies that more than an 8 dBA increase above the ambient noise level is not permitted, the project would result in a significant impact if the noise produced by the project at the north property plane would exceed 63 dBA $L_{eq,}$

Table 14, Rooftop Deck Noise Levels, shows the projected exterior noise level at the northern property plane and the interior noise level at the nearest residential (1321 Columbus Avenue) and hotel (580 Beach Street) buildings as a result of amplified music on the future rooftop deck of the proposed project. As shown in **Table 14**, without limits to the amplifier noise level, the rooftop deck noise levels would exceed the City's noise ordinance exterior noise criteria of 63 dBA L_{eq} at the project's northern property plane (over an 8 dBA increase in ambient noise levels) and the City's noise ordinance interior noise criteria of 45 dBA L_{eq} for bedrooms and living rooms. To reduce noise levels generated from amplified sound at the rooftop deck, amplified sound shall be limited to no greater than 77 dBA L_{max} at 25 feet from the center of the loudspeaker and shall be designed with electronic limiters to maintain a noise level of 77 dBA L_{max} at a distance of 25 feet in any direction. In addition, speakers shall be oriented away from sensitive receptors, including the neighboring residential building at 1321 Columbus Avenue and the hotel at 580 Beach Street. These requirements would be achieved through the implementation of Mitigation Measure M-NO-3, which would reduce noise levels generated from amplified sound at the rooftop deck and would reduce potential effects from amplified sound on existing noise-sensitive receptors to a less-than-significant level.

Table 14: Rooftop Deck Noise Levels

Receptor Location	Noise Level[1]	Mitigated Noise Level[2]	Criterion
Nearest Property Plane (North)	78 dBA L_{eq} (exterior)	63 dBA L_{eq} (exterior)	63 dBA L_{eq} (exterior)
1321 Columbus Avenue	57 dBA L_{eq} (interior)	42 dBA L_{eq} (interior)	45 dBA L_{eq} (interior)
580 Beach Street	47 dBA L_{eq} (interior)	32 dBA L_{eq} (interior)	45 dBA L_{eq} (interior)

Source: Charles M. Salter Associates, Inc., October 2019.

Notes:

1 Noise levels are based on maximum amplified sound of 92 dBA L_{max} at 25 feet.

2 Noise levels are based on amplified sound limited to 77 dBA L_{max} at 25 feet.

Mitigation Measure M-NO-3: Rooftop Deck Noise Controls

The project sponsor shall implement the following mitigation measures to reduce rooftop deck noise levels in order to meet the requirements of the noise ordinance:

1. The project sponsor shall limit amplified sound on the rooftop deck to no greater than 77 dBA L_{max} at 25 feet from the center of the loudspeaker and be designed with electronic limiters to maintain a noise level of 77 dBA L_{max} at 25 feet.

2. The project sponsor shall orient speakers used on the rooftop deck away from sensitive receptors, including the residential building at 1321 Columbus Avenue and the hotel at 580 Beach Street.

3. All noise generating equipment (e.g., speakers) shall be located at a maximum height of 3 feet above the roof deck.

The project sponsor shall provide documentation demonstrating the combination of measures chosen to achieve the required noise reduction to the planning department prior to the issuance of the certificate of occupancy.

Mitigation Measure M-NO-3 would limit noise generated by amplified sound at the project's property plane and interior noise at the nearest residential and hotel building. As shown in **Table 14**, with mitigation, rooftop deck operations related to use of amplified sound during events would not exceed the City's noise ordinance criteria. Therefore, exterior and interior noise impacts from amplified sound at the rooftop deck would be less than significant with the implementation of Mitigation Measure M-NO-3.

Table 15, Combined Noise Levels, shows the combined exterior noise level at the northern property plane and the interior noise level at the nearest residential (1321 Columbus Avenue) and hotel (580 Beach Street) buildings from noise generated by amplified music on the rooftop deck and rooftop mechanical equipment during the hours of operation of the rooftop deck (i.e., between 12 p.m. and 12 a.m.). As shown in **Table 14**, unmitigated noise levels associated with amplified sound at the rooftop deck would exceed the City's noise ordinance criterion. These noise levels, combined with the rooftop mechanical noise levels shown in

Table 13, p. 71 (which do not alone exceed the noise ordinance criteria) would combine to exceed the City's exterior and interior noise level criteria, resulting in a significant impact.

As shown in **Table 15**, with implementation of Mitigation Measure M-NO-3, the combined project noise levels would not exceed the City's noise ordinance criteria for exterior noise of 63 dBA L_{eq} and the City's noise ordinance criteria for nighttime (10 p.m. and 7 a.m.) interior noise of 45 dBA L_{eq} for bedrooms and living rooms. Therefore, noise levels resulting from the combination of amplified sound on the rooftop deck and rooftop mechanical equipment would be reduced to a less-than-significant level.

Table 15: Combined Noise Levels

Receiver Location	Noise Source	Mitigated Noise Level (dBA Leq)	Mitigated Combined Noise Level (dBA Leq)	Criterion (dBA Leq)	Exceed Criterion (dBA Leq)?
Nearest Property Plane (North)	Rooftop Deck	63	63	63	No
	Rooftop Mechanical Equipment	45			
1321 Columbus Avenue	Rooftop Deck	42	43	45	No
	Rooftop Mechanical Equipment	30			
580 Beach Street	Rooftop Deck	32	35	45	No
	Rooftop Mechanical Equipment	29			

Source: Charles M. Salter Associates, Inc., October 2019.

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

The project would result in construction noise; however, the projects listed in **Table 2**, p. 6, are not located within the vicinity of the proposed project. As such, construction noise would be unlikely to combine in a way that would result in cumulative noise impacts. Moreover, construction noise from the proposed project would be temporary and intermittent. Thus, with the implementation of Mitigation Measure M-NO-1, project noise effects would not combine with past, present and reasonably foreseeable future projects to result in cumulative construction noise impacts.

The proposed project could result in vibration impacts; however, with implementation of Mitigation Measure M-NO-2, which would reduce project construction vibration impacts, vibration impacts would be less than significant. Vibration effects associated with construction the projects listed in **Table 2**, p. 6, would be far enough away from the project site such that they would not combine to result in cumulative vibration impacts. Thus, with the implementation Mitigation Measure M-NO-2, cumulative construction vibration impacts would be less than significant.

Past and present development in the project vicinity may result in permanent increases in ambient noise levels from traffic and temporary and periodic increases from repeated and ongoing episodes of major

construction even with the implementation of Mitigation Measure M-NO-3, which would reduce noise generated from amplified sound at the rooftop deck. Recently approved and reasonably foreseeable nearby projects listed in **Table 2**, p. 6, including the proposed project, would be expected to result in continuing increases in traffic volumes and associated traffic noise, but traffic would be distributed along local roadways and would not result in a doubling of traffic volumes along nearby streets. Moreover, the proposed project's stationary noise sources (amplified sound at the rooftop deck and rooftop mechanical equipment) and stationary noise sources from reasonably foreseeable cumulative projects would be required to comply with the noise ordinance. Therefore, with the implementation Mitigation Measure M-NO-3, in combination with reasonably foreseeable cumulative projects, the proposed project would not make a considerable contribution to any significant noise impacts during project operation, and cumulative operational noise impacts would be less than significant.

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

Setting

Overview

The Bay Area Air Quality Management District (air district) is the regional agency with jurisdiction over the nine-county San Francisco Bay Area Air Basin (air basin), which includes San Francisco, Alameda, Contra Costa, Marin, San Mateo, Santa Clara, and Napa counties and portions of Sonoma and Solano counties. The air district is responsible for attaining and maintaining air quality in the air basin within federal and state air quality standards, as established by the federal Clean Air Act and the California Clean Air Act, respectively. Specifically, the air district has the responsibility to monitor ambient air pollutant levels throughout the air basin and to develop and implement strategies to attain the applicable federal and state standards. The federal and state Clean Air Acts require plans to be developed for areas that do not meet air quality standards, generally. The most recent air quality plan, the clean air plan, was adopted

by the air district on April 19, 2017. The clean air plan updates the most recent Bay Area ozone plan, the clean air plan, in accordance with the requirements of the state Clean Air Act to implement all feasible measures to reduce ozone; provide a control strategy to reduce ozone, particulate matter, air toxics, and greenhouse gases in a single, integrated plan; and establish emission control measures to be adopted or implemented. The clean air plan contains the following primary goals:

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

- Protect the climate: Reduce Bay Area greenhouse gas emissions to 40 percent below 1990 levels by 2030 and 80 percent below 1990 levels by 2050. The *2017 Clean Air Plan* represents the most current applicable air quality plan for the air basin. Consistency with this plan is the basis for determining whether the proposed project would conflict with or obstruct implementation of air quality plans.

Criteria Air Pollutants

In accordance with the state and federal clean air acts, air pollutant standards are identified for the following six criteria air pollutants: ozone, carbon monoxide (CO), particulate matter (PM), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), 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 of emissions. In general, the air basin experiences low concentrations of most pollutants when compared to federal or state standards. The air basin is designated as either in attainment[58] or unclassified for most criteria pollutants with the exception of ozone, $PM_{2.5}$, and PM_{10}, 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, by itself, to result in non-attainment of air quality standards. Instead, a project's individual emissions contribute to existing cumulative air quality impacts. If a project's contribution to cumulative air quality impacts is considerable, then the project's impact on air quality would be considered significant.[59]

Land use projects may contribute to regional criteria air pollutants during the construction and operational phases of a project. **Table 16, Criteria Air Pollutant Significance Thresholds,** 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 air basin.

[58] "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.

[59] Bay Area Air Quality Management District, *California Environmental Quality Act Air Quality Guidelines*, May 2017, page 2-1.

Table 16: 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	

Source: Bay Area Air Quality Management District, *California Environmental Quality Act Air Quality Guidelines*, May 2017, page 2-2.

Ozone Precursors. As discussed previously, the air basin 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, air district 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).[60] These levels represent emissions below 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 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 (PM_{10} and $PM_{2.5}$).[61] The air district has not established an offset limit for $PM_{2.5}$. However, the emissions limit in the federal New Source Review for stationary sources in nonattainment areas is an appropriate significance threshold. For PM_{10} and $PM_{2.5}$, the emissions limit under the air district's New Source Review (Regulation 2, Rule 2) is 15 tons per year (82 lbs. per day) and 10 tons per year (54 lbs. per

[60] Bay Area Air Quality Management District, Revised Draft Options and Justification Report, California Environmental Quality Act Thresholds of Significance, October 2009, page 17.

[61] PM_{10} 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.

day), respectively.[62] These emissions limits represent levels below which a source is not expected to have an impact on air quality.[63] 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 at construction sites significantly control fugitive dust[64] and individual measures have been shown to reduce fugitive dust by anywhere from 30 to 90 percent.[65] The air district has identified a number of best management practices to control fugitive dust emissions from construction activities.[66] 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 best management practices employed in compliance with the City's Construction Dust Control Ordinance are 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 SO_2 concentrations have never exceeded the standards. The primary source of CO emissions from development projects is vehicle traffic. Construction-related SO_2 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 SO_2. Furthermore, the air district 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 SO_2 emissions that could result from development projects, development projects would not result in a cumulatively considerable net increase in CO or SO_2 emissions, and quantitative analysis is not required.

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[62] Bay Area Air Quality Management District, *Amended Regulation 2, Rule 2: Permits – New Source Review*, December 17, 2017.

[63] Bay Area Air Quality Management District, Revised Draft Options and Justification Report, California Environmental Quality Act Thresholds of Significance, October 2009, page 16.

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

[65] Bay Area Air Quality Management District, *CEQA Air Quality Guidelines*, May 2017, page D-47.

[66] Ibid.

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 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 air district using a risk-based approach to determine which sources and pollutants to control as well as the degree of control. A health risk assessment is an analysis in which human health exposure to toxic substances is estimated, and considered together with information regarding the toxic potency of the substances, to provide quantitative estimates of health risks.[67]

Air pollution does not affect every individual in the population in the same way, and some groups are more sensitive to adverse health effects than others. Land uses such as residences, schools, children's day care centers, hospitals, and nursing and convalescent homes are considered to be the most sensitive to poor air quality because the population groups associated with these uses have increased susceptibility to respiratory distress or, as in the case of residential receptors, their exposure time is greater than that for other land uses. Therefore, these groups are referred to as sensitive receptors. Exposure assessment guidance typically assumes that residences would be exposed to air pollution 24 hours per day, 7 days a week, for 30 years.[68] Therefore, assessments of air pollutant exposure to residents typically result in the greatest adverse health outcomes of all population groups.

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.[69] In addition to $PM_{2.5}$, diesel particulate matter (DPM) is also of concern. The California Air Resources Board (California air board) identified DPM as a toxic air contaminant in 1998, primarily based on evidence demonstrating cancer effects in humans.[70] 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.

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

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

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

[70] 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 air district to conduct a citywide health risk assessment based on an inventory and assessment of air pollution and exposures from mobile, stationary, and area sources within San Francisco. Areas with poor air quality, termed the "Air Pollutant Exposure Zone," were identified based on health-protective criteria that consider estimated cancer risk, exposures to fine particulate matter, proximity to freeways, and locations with particularly vulnerable populations. The project site is located within the Air Pollutant Exposure Zone. Each of the Air Pollutant Exposure Zone criteria is discussed below.

Excess Cancer Risk. The Air Pollution Exposure Zone includes areas where modeled cancer risk exceeds 100 incidents per million persons exposed. This criteria is based on United States Environmental Protection Agency (EPA) guidance for conducting air toxic analyses and making risk management decisions at the facility and community-scale level.[71] As described by the air district, the EPA 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 rulemaking,[72] the EPA 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 air district regional modeling.[73]

Fine Particulate Matter. In April 2011, the EPA published Policy Assessment for the Particulate Matter Review of the National Ambient Air Quality Standards, "Particulate Matter Policy Assessment." In this document, EPA staff concludes that the then current federal annual $PM_{2.5}$ standard of 15 $\mu g/m^3$ should be revised to a level within the range of 13 to 11 $\mu g/m^3$, with evidence strongly supporting a standard within the range of 12 to 11 $\mu g/m^3$. The Air Pollutant Exposure Zone for San Francisco is based on the health protective $PM_{2.5}$ standard of 11 $\mu g/m^3$, as supported by the EPA's Particulate Matter Policy Assessment, although lowered to 10 $\mu g/m^3$ to account for uncertainty in accurately predicting air pollutant concentrations using emissions modeling programs.

Proximity to Freeways. According to the California Air Resources Board (air board), studies have shown an association between the proximity of sensitive land uses to freeways and a variety of respiratory symptoms, asthma exacerbations, and decreases in lung function in children. Siting sensitive uses 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

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

[72] Federal Register 38044, September 14, 1989.

[73] Bay Area Air Quality Management District, *Clean Air Plan,* May 2017, page D-43.

health risk from air pollution,[74] parcels that are within 500 feet of freeways are included in the Air Pollutant Exposure Zone.

Health Vulnerable Locations. Based on the air district's evaluation of health vulnerability in the Bay Area, those zip codes (94102, 94103, 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 parcels in the Air Pollutant Exposure Zone to: (1) an excess cancer risk greater than 90 per one million persons exposed, and/or (2) $PM_{2.5}$ concentrations in excess of 9 $\mu g/m^3$.[75]

The above citywide health risk modeling was also used as the basis in approving amendments to the San Francisco Building and Health Codes, 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, or 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 fine particulate matter in the form of dust (fugitive dust) and exhaust (e.g., vehicle tailpipe emissions). Emissions of ozone precursors and fine particular matter 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 would occur over an approximately 16-month period and would consist of the following partially overlapping phases: (1) demolition and pile drilling; (2) excavation and shoring; (3) foundation and below-grade construction; (4) base building installation; (5) exterior finishing; and (6) interior finishing. During the project's approximately 16-month

[74] 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*.

[75] 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.

construction period, construction activities would have the potential to result in emissions of ozone precursors and fine particulate matter, as discussed below.

Fugitive Dust

Project-related demolition, excavation, grading, and other construction activities may cause wind-blown dust that could contribute particulate matter into the local atmosphere. Depending on exposure, adverse health effects can occur due to this particulate matter in general and also due to specific contaminants such as lead or asbestos that may be constituents of soil. 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 California air board, reducing $PM_{2.5}$ concentrations to state and federal standards of 12 $\mu g/m^3$ in the San Francisco Bay Area would prevent between 200 and 1,300 premature deaths.[76]

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

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

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. The Department of Building Inspection 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, which has been prepared and conditionally approved by the Department of Public Health,[77] would require the project sponsor to: submit 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

[76] 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.

[77] San Francisco Department of Public Health, Conditional Site Mitigation Plan and Dust Control Plan Approval, 1300 Columbus Avenue, San Francisco, CA, 94133, EHB-SAM SMED: 1650, November 9, 2018.

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. San Francisco 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. Non-potable water must be used for soil compaction and dust control activities during project construction and demolition. The San Francisco Public Utilities Commission operates a recycled water truck-fill station at the Southeast Water Pollution Control Plant that provides recycled water for these activities at no charge.

Compliance with the regulations and procedures set forth by the Dust Control Ordinance would ensure that potential dust-related air quality impacts would be reduced to 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 16**, p. 77, the air district, in its CEQA Air Quality Guidelines (May 2017), 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 greenfield[78] 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 includes an 87,620-square-foot expansion of the existing hotel building with development of a new, four-story (40-foot-tall) hotel wing along North Point Street and Columbus Avenue, connected to the existing hotel and located primarily within the footprint of the existing surface parking lot. The proposed expansion would contain 174 new guestrooms, 8,100 square feet of ground-level retail, a 2,400 square-foot roof deck, and 290 square feet of new open space uses. A total of 820 cubic yards of soils

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

would be excavated from the site. The size of proposed construction activities would be below the criteria air pollutant screening sizes for hotel uses (554 rooms) and strip mall (277,000 square feet) and amount of material transport (10,000 cubic yards) as identified in the air district's CEQA Air Quality Guidelines Table 3-1. Thus, quantification of construction-related criteria air pollutant emissions is not required and the proposed project's construction activities would result in a less-than-significant criteria air pollutant impact.

Impact AQ-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 with Mitigation)

The project site is located within the Air Pollutant Exposure Zone as described above. Sensitive land uses near the project site include a three-story mixed-use residential building (2801 Leavenworth Street) across Beach Street to the north, a four-story mixed-use residential building (1255 Columbus Avenue) across North Point Street to the south, and a three-story mixed-use residential building (2701 Leavenworth Street) and four-story residential building (1321 Columbus Avenue) to the southwest across Columbus Avenue. The proposed project would include new hotel uses, including 174 new guestrooms, 8,100 square feet of ground-level retail, a 2,400-square-foot roof deck, and 290 square feet of new open space uses, which is not considered a sensitive land use.

Regarding construction emissions, off-road equipment (which includes construction-related equipment) is a large contributor to diesel particulate matter emissions in California, although since 2007, the ARB has found the emissions to be substantially lower than previously expected.[79]

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 diesel particulate matter emissions in California.[80] For example, revised PM emission estimates for the year 2010, for which diesel particulate matter was a major component of total PM, have decreased by 83 percent from previous 2010 emissions estimates for the air basin.[81] Approximately half of the reduction in emissions can be attributed to the economic recession and half to updated methodologies used to better assess construction emissions.[82]

Additionally, a number of federal and state regulations are requiring cleaner off-road equipment. Specifically, both the EPA and California air board have set emissions standards for new off-road

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[79] 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.

[80] 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.

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

[82] 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.

equipment engines, ranging from Tier 1 to Tier 4. Tier 1 emission standards were phased in between 1996 and 2000 and Tier 4 Interim and Final emission standards for all new engines were phased in between 2008 and 2015. 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 not be realized for several years, the EPA estimates that by implementing the federal Tier 4 standards, NO_x and PM emissions will be reduced by more than 90 percent.[83]

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

> "Due to the variable nature of construction activity, the generation of TAC emissions in most cases would be temporary, especially considering the short amount of time such equipment is typically within an influential distance that would result in the exposure of sensitive receptors to substantial concentrations. Concentrations of mobile-source diesel PM emissions are typically reduced by 70 percent at a distance of approximately 500 feet (ARB 2005). In addition, current models and methodologies for conducting health risk assessments are associated with longer-term exposure periods of 9, 40, and 70 years, which do not correlate well with the temporary and highly variable nature of construction activities. This results in difficulties with producing accurate estimates of health risk."[84]

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, as discussed above, 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.

The proposed project would require construction activities for the approximate 16-month construction period. Project construction activities would result in short-term emissions of DPM and other TACs. The project site is located in an area that already experiences poor air quality and project construction activities would generate additional air pollution, affecting nearby sensitive receptors and resulting in a significant impact. Implementation of **Mitigation Measure M-AQ-2, Construction Air Quality,** would reduce the magnitude of this impact to a less-than-significant level. While emission reductions from limiting idling, educating workers and the public and properly maintaining equipment are difficult to quantify, other measures, specifically the requirement for equipment with Tier 2 engines and Level 3 Verified Diesel Emission Control Strategy (VDECS) can reduce construction emissions by 89 to 94 percent compared to equipment with engines meeting no emission standards and without a VDECS.[85] Emissions reductions

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[83] USEPA, "Clean Air Nonroad Diesel Rule: Fact Sheet," May 2004.

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

[85] PM emissions benefits are estimated by comparing off-road PM emission standards for Tier 2 with Tier 1 and 0. Tier 0 off-road engines do not have PM emission standards, but the United States Environmental Protection Agency's *Exhaust and Crankcase Emissions Factors for Nonroad Engine Modeling – Compression Ignition* has estimated Tier 0 engines between 50 hp and 100 hp to have a PM emission factor of 0.72 g/hp-hr and greater than 100 hp to have a PM emission factor of 0.40 g/hp-hr. Therefore, requiring off-road equipment to have at least a Tier 2 engine would result in between a 25 percent and 63 percent reduction in PM emissions, as compared to off-road equipment

from the combination of Tier 2 equipment with level 3 VDECS is almost equivalent to requiring only equipment with Tier 4 Final engines. Therefore, compliance with Mitigation Measure M-AQ-2 would reduce construction emissions impacts on nearby sensitive receptors to a less-than-significant level.

Mitigation Measure M-AQ-2: Construction Air Quality

The project sponsor or the project sponsor's contractor shall comply with the following:

A. *Engine Requirements.*

1. All off-road equipment greater than 25 hp and operating for more than 20 total hours over the entire duration of construction activities shall have engines that meet or exceed either U.S. Environmental Protection Agency (USEPA) or California Air Resources Board (ARB) Tier 2 off-road emission standards, and have been retrofitted with an ARB Level 3 Verified Diesel Emissions Control Strategy. Equipment with engines meeting Tier 4 Interim or Tier 4 Final off-road emission standards automatically meet this requirement.

2. Where access to alternative sources of power are available, portable diesel engines shall be prohibited.

3. Diesel engines, whether for off-road or on-road equipment, shall not be left idling for more than two minutes, at any location, except as provided in exceptions to the applicable state regulations regarding idling for off-road and on-road equipment (e.g., traffic conditions, safe operating conditions). The contractor shall post legible and visible signs in English, Spanish, and Chinese, in designated queuing areas and at the construction site to remind operators of the two minute idling limit.

4. The contractor shall instruct construction workers and equipment operators on the maintenance and tuning of construction equipment, and require that such workers and operators properly maintain and tune equipment in accordance with manufacturer specifications.

B. *Waivers.*

1. The planning department's environmental review officer or designee (ERO) may waive the alternative source of power requirement of Subsection (A)(2) if an alternative source of power is limited or infeasible at the project site. If the ERO grants the waiver, the contractor must submit documentation that the equipment used for onsite power generation meets the requirements of Subsection (A)(1).

with Tier 0 or Tier 1 engines. The 25 percent reduction comes from comparing the PM emission standards for off-road engines between 25 hp and 50 hp for Tier 2 (0.45 g/bhp-hr) and Tier 1 (0.60 g/bhp-hr). The 63 percent reduction comes from comparing the PM emission standards for off-road engines above 175 hp for Tier 2 (0.15 g/bhp-hr) and Tier 0 (0.40 g/bhp-hr). In addition to the Tier 2 requirement, ARB Level 3 VDECSs are required and would reduce PM by an additional 85 percent. Therefore, the mitigation measure would result in between an 89 percent (0.0675 g/bhp-hr) and 94 percent (0.0225 g/bhp-hr) reduction in PM emissions, as compared to equipment with Tier 1 (0.60 g/bhp-hr) or Tier 0 engines (0.40 g/bhp-hr).

2. The ERO may waive the equipment requirements of Subsection (A)(1) if: a particular piece of off-road equipment with an ARB Level 3 VDECS is technically not feasible; the equipment would not produce desired emissions reduction due to expected operating modes; installation of the equipment would create a safety hazard or impaired visibility for the operator; or, there is a compelling emergency need to use off-road equipment that is not retrofitted with an ARB Level 3 VDECS. If the ERO grants the waiver, the contractor must use the next cleanest piece of off-road equipment, according to the following.

Off-Road Equipment Compliance Step-down Schedule

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

How to use the table: If the ERO determines that the equipment requirements cannot be met, then the project sponsor would need to meet Compliance Alternative 1. If the ERO determines that the contractor cannot supply off-road equipment meeting Compliance Alternative 1, then the contractor must meet Compliance Alternative 2. If the ERO determines that the contractor cannot supply off-road equipment meeting Compliance Alternative 2, then the contractor must meet Compliance Alternative 3.
** Alternative fuels are not a VDECS.

C. *Construction Emissions Minimization Plan.* Before starting onsite construction activities, the contractor shall submit a Construction Emissions Minimization Plan (Plan) to the ERO for review and approval. The Plan shall state, in reasonable detail, how the contractor will meet the requirements of section A.

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

2. The project sponsor shall ensure that all applicable requirements of the Plan have been incorporated into the contract specifications. The Plan shall include a certification statement that the contractor agrees to comply fully with the Plan.

3. The contractor shall make the Plan available to the public for review onsite during working hours. The contractor shall post at the construction site a legible and visible sign summarizing the Plan. The sign shall also state that the public may ask to inspect the Plan for the project at any time during working hours and shall explain how to request to inspect the Plan. The contractor shall post at least one copy of the sign in a visible location on each side of the construction site facing a public right-of-way.

D. *Monitoring.* After start of construction activities, the contractor shall submit quarterly reports to the ERO documenting compliance with the Plan. After completion of construction activities and prior to receiving a final certificate of occupancy, the project sponsor shall submit to the ERO a final report summarizing construction activities, including the start and end dates and duration of each construction phase, and the specific information required in the Plan.

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.

Impact AQ-3: During project operations, the proposed project would result in emissions of criteria air pollutants, but not 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 air district, in its CEQA Air Quality Guidelines (May 2017), has developed screening criteria to determine whether a project requires an analysis of project-generated criteria air pollutants. If all the screening criteria are met by a proposed project, then the lead agency or applicant does not need to perform a detailed air quality assessment.

The proposed project includes an 87,620-square-foot expansion of an existing hotel with 174 new guestrooms, 8,100 square feet of ground-level retail, a 2,400-square-foot roof deck, and 290 square feet of new open space uses and is anticipated to generate approximately 2,412 net new vehicle trips. The proposed project would be below the criteria air pollutant screening sizes for operations of a hotel (489 rooms), retail (99,000 square feet), and the amount of material transport (10,000 cubic yards) as identified in the air district's CEQA Air Quality Guidelines Table 3-1. Thus, quantification of project-generated criteria air pollutant emissions is not required, and the proposed project would not exceed any of the significance thresholds for criteria air pollutants, and would result in less than significant impact with respect to criteria air pollutants.

Impact AQ-4: The proposed project would generate toxic air contaminants, including diesel particulate matter, exposing sensitive receptors to substantial air pollutant concentrations. (Less than Significant with Mitigation)

The project site is located within the Air Pollutant Exposure Zone as described above. Sensitive land uses near the project site include a three-story mixed-use residential building (2801 Leavenworth Street) across Beach Street to the north, a four-story mixed-use residential building (1255 Columbus Avenue) across North Point Street to the south, and a three-story mixed-use residential building (2701 Leavenworth Street) and four-story residential building (1321 Columbus Avenue) to the southwest across Columbus Avenue. The proposed project would include new hotel uses, including 174 guestrooms, 8,100 square feet of ground-level retail, a 2,400-square-foot roof deck, and 290 square feet of open space uses, which is not considered

a sensitive land use. The proposed project would also include a backup emergency generator, which would include new sources of toxic air contaminants.

Sources of Toxic Air Contaminants

Individual projects result in emissions of toxic air contaminants primarily as a result of an increase in vehicle trips. The air district considers roads with less than 10,000 vehicles per day to be "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 2,412 vehicle trips would be well below this level and would be distributed among the local roadway network, therefore an assessment of project-generated toxic air contaminants resulting from vehicle trips is not required and the proposed project would not generate a substantial amount of toxic air contaminant emissions that could affect nearby sensitive receptors.

The proposed project would also include a backup emergency generator. Emergency generators are regulated by the air district through their New Source Review (Regulation 2, Rule 5) permitting process. The project sponsor would be required to obtain applicable permits to operate an emergency generator from the air district. Although emergency generators are intended only to be used in periods of power outages, monthly testing of the generator would be required. The air district limits testing to no more than 50 hours per year. Additionally, as part of the permitting process, the air district would limit 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. However, because the project site is located in an area that already experiences poor air quality, the proposed emergency back-up generator has the potential to expose sensitive receptors to substantial concentrations of diesel emissions, a known toxic air contaminant, resulting in a significant air quality impact. Implementation of **Mitigation Measure AQ-4, Best Available Control Technology for Diesel Generators**, would reduce the magnitude of this impact to a less-than-significant level by reducing emissions by 89 to 94 percent compared to equipment with engines that do not meet any emission standards and without a Verified Diesel Emissions Control Strategy (VDECS). Therefore, although the proposed project would add a new source of toxic air contaminants within an area that already experiences poor air quality, implementation of M-AQ-4 would reduce this impact to a less-than-significant level.

Mitigation Measure M-AQ-4: Best Available Control Technology for Diesel Generators

The project sponsor shall ensure that the backup diesel generator 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 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 air resources board verified model and if the air district approves of its use. The project sponsor shall submit documentation of compliance with the air district's New Source Review permitting process (Regulation 2, Rule 2, and Regulation 2, Rule 5) and the emission standard requirement of this mitigation measure to the planning department for review and approval prior to issuance of a permit for a backup diesel generator from any City agency.

Impact AQ-5: The proposed project would not conflict with, or obstruct implementation of, the 2017 Clean Air Plan. (Less than Significant)

The most recently adopted air quality plan for the air basin is the air district's 2017 Clean Air Plan (clean air plan). The clean air plan is a road map that demonstrates how the San Francisco Bay Area will achieve compliance with the state ozone standards 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 clean air plan, this analysis considers whether the project would: (1) support the primary goals of the clean air plan; (2) include applicable control measures from the clean air plan; and (3) avoid disrupting or hindering implementation of control measures identified in the clean air plan.

The primary goals of the clean air plan are to: (1) Protect air quality and health at the regional and local scale; (2) eliminate disparities among Bay Area communities in cancer health risk from toxic air contaminants; and (3) protect the climate by reducing greenhouse gas emissions. To meet the primary goals, the clean air plan 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 clean air plan recognizes that to a great extent, community design dictates individual travel mode, and that a key long-term control strategy to reduce emissions of criteria pollutants, air toxics, and greenhouse gases from motor vehicles is to channel future Bay Area growth into vibrant urban communities where goods and services are close at hand, and people have a range of viable transportation options. To this end, the clean air plan includes 85 control measures aimed at reducing air pollution in the air basin.

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 are discussed in Section E.8, Greenhouse Gas Emissions, which demonstrates that the proposed project would comply with the applicable provisions of the City's greenhouse gas reduction strategy.

The infill nature of the proposed project and high availability of viable transportation options ensure that hotel visitors and customers could bicycle, walk, and ride transit to and from the project site instead of taking trips via private automobile. These features ensure that the project would avoid substantial growth in automobile trips and vehicle miles traveled. The proposed project's anticipated 2,412 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 E.5, Transportation and Circulation. Control measures that are identified in the clean air plan are implemented by the San Francisco General Plan and the planning code for example, through the city's Transit First Policy, bicycle parking requirements, and transit impact development fees. Compliance with these requirements would ensure the project includes relevant transportation control measures specified in the clean air plan. Therefore, the proposed project would include applicable control measures identified in the clean air plan to the meet the clean air plan's primary goals.

Examples of a project 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 propose excessive parking beyond parking requirements. The proposed project would result in the expansion of an existing hotel, including 174 new guestrooms, 8,100 square feet of ground-level retail, a 2,400-square-foot roof deck, and

290 square feet of new open space uses within a dense, walkable urban area near a concentration of regional and local transit service. In addition, the proposed project would result in a net reduction of 54 parking spaces on the site. It would not preclude the extension of a transit line or a bike path or any other transit improvement and would not include an excessive amount of parking beyond what is required, and thus would not disrupt or hinder implementation of control measures identified in the clean air plan.

For the reasons described above, the proposed project would not interfere with implementation of the 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.

Impact AQ-6: The proposed project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people. (Less than Significant)

Typical odor sources of concern include wastewater treatment plants, sanitary landfills, transfer stations, composting facilities, petroleum refineries, asphalt batch plants, chemical manufacturing facilities, fiberglass manufacturing facilities, auto body shops, rendering plants, and coffee roasting facilities. During construction, diesel exhaust from construction equipment would generate some odors. However, construction-related odors would be temporary and would not persist upon project completion. Additionally, the proposed project includes an expansion of an existing hotel use, including 174 new guestrooms, 8,100 square feet of ground-level retail, a 2,400-square-foot roof deck, and 290 square feet of new open space uses, and would therefore not create a significant sources of new odors. Therefore, the proposed project would not result in other emissions, such as odors, that could adversely affect a substantial number of people and this impact would be less than significant.

Cumulative Air Quality Impacts

Impact C-AQ-1: The proposed project, in combination with past present, present, and reasonably foreseeable future development in the project area would result in less-than-significant cumulative impacts to air quality. (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.[86] 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.

[86] Bay Area Air Quality Management District, *CEQA Air Quality Guidelines*, May 2017, page 2-1.

As discussed above, the project site is located in an area that already experiences poor air quality. The project would involve new construction, adding temporary sources of TACs within an area already adversely affected by air quality, resulting in a considerable contribution to cumulative health risk impacts on sensitive receptors. This would be a significant cumulative impact. The proposed project would be required to implement Mitigation Measure M-AQ-2 Construction Air Quality which could reduce construction period emissions by as much as 94 percent. Implementation of this mitigation measure would reduce the project's contribution to cumulative air quality impacts to a less-than-significant level.

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

Greenhouse gas (GHG) emissions and global climate change represent cumulative impacts. GHG emissions cumulatively contribute to the significant adverse environmental impacts of global climate change. No single project could generate enough GHG emissions to noticeably change the global average temperature; instead, the combination of GHG emissions from past, present, and future projects have contributed and will continue to contribute to global climate change and its associated environmental impacts.

The Bay Area Air Quality Management District (air district) 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 GHGs and describes the required contents of such a plan. Accordingly, San Francisco has prepared Strategies to Address Greenhouse Gas Emissions[87] which presents a comprehensive assessment of policies, programs, and ordinances that collectively represent San Francisco's qualified GHG reduction strategy in compliance with the CEQA guidelines. These GHG reduction actions have resulted in a 36 percent reduction in GHG

[87] San Francisco Planning Department, *Strategies to Address Greenhouse Gas Emissions in San Francisco,* July 2017. This document is available online at: *https://sfplanning.org/project/greenhouse-gas-reduction-strategies#info,* accessed September 2019.

emissions in 2017 compared to 1990 levels,[88] exceeding the year 2020 reduction goals outlined in the air district's 2017 Clean Air Plan, Executive Order S-3-05, and Assembly Bill 32 (also known as the Global Warming Solutions Act).[89]

Given that the City has met the state and region's 2020 GHG reduction targets and San Francisco's GHG reduction goals are consistent with, or more aggressive than, the long-term goals established under order S-3-05[90], order B-30-15,[91,92] and Senate Bill 32[93,94] the City's GHG reduction goals are consistent with order S-3-05, order B-30-15, Assembly Bill 32, Senate Bill 32 and the 2017 Clean Air Plan. Therefore, proposed projects that are consistent with the City's GHG reduction strategy would be consistent with the aforementioned GHG reduction goals, would not conflict with these plans or result in significant GHG emissions, 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. Because no individual project could emit GHGs at a level that could result in a significant impact on the global climate, this analysis is in a cumulative context, and this section does not include an individual project-specific impact statement.

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88 San Francisco Department of the Environment, *San Francisco's Carbon Footprint.* Available at *https://sfenvironment.org/carbon-footprint*, accessed September 2019.

89 Executive Order S-3-05, Assembly Bill 32, and the air district's 2017 Clean Air Plan (continuing the trajectory set in the 2010 Clean Air Plan) set a target of reducing GHG emissions to below 1990 levels by year 2020.

90 Office of the Governor, Executive Order S-3-05, June 1, 2005. Available at *http://static1.squarespace.com/static/549885d4e4b0ba0bff5dc695/t/54d7f1e0e4b0f0798cee3010/1423438304744/California+Executive+Order+S-3-05+(June+2005).pdf* . 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 metric tons of carbon dioxide equivalents (MTCO2E)); by 2020, reduce emissions to 1990 levels (approximately 427 million MTCO2E); and by 2050 reduce emissions to 80 percent below 1990 levels (approximately 85 million MTCO2E). Because of the differential heat absorption potential of various GHGs, GHG emissions are frequently measured in "carbon dioxide-equivalents," which present a weighted average based on each gas's heat absorption (or "global warming") potential.

91 Office of the Governor, *Executive Order B-30-15,* April 29, 2015. Available at *https://www.gov.ca.gov/news.php?id=18938*, accessed March 3, 2016. Executive Order B-30-15, issued on April 29, 2015, sets forth a target of reducing GHG emissions to 40 percent below 1990 levels by 2030 (estimated at 2.9 million $MTCO_2E$).

92 San Francisco's GHG reduction goals are codified in section 902 of the environment code and include: (i) by 2008, determine City GHG emissions for year 1990; (ii) by 2017, reduce GHG emissions by 25 percent below 1990 levels; (iii) by 2025, reduce GHG emissions by 40 percent below 1990 levels; and by 2050, reduce GHG emissions by 80 percent below 1990 levels.

93 Senate Bill 32 amends California Health and Safety Code Division 25.5 (also known as the California Global Warming Solutions Act of 2006) by adding section 38566, which directs that statewide greenhouse gas emissions to be reduced by 40 percent below 1990 levels by 2030.

94 Senate Bill 32 was paired with Assembly Bill 197, which would modify the structure of the State Air Resources Board; institute requirements for the disclosure of greenhouse gas emissions criteria pollutants, and toxic air contaminants; and establish requirements for the review and adoption of rules, regulations, and measures for the reduction of greenhouse gas emissions.

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

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 intensity of use of the site by constructing an 87,620-square-foot expansion of an existing hotel with 174 new guestrooms, 8,100 square feet of ground-level retail, a 2,400-square-foot roof deck, and 290 square feet of new ground-floor open space uses. Therefore, the proposed project would contribute to annual long-term increases in GHGs as a result of increased vehicle trips (mobile sources) and commercial operations that result in an increase in energy use, water use, wastewater treatment, and solid waste disposal. Construction activities would also result in temporary increases in GHG emissions.

The proposed project would be subject to regulations adopted to reduce GHG emissions as identified in the GHG reduction strategy. As discussed below and as further outlined in the Greenhouse Gas Analysis Compliance Checklist prepared for the proposed project,[95] compliance with the applicable regulations would reduce the project's GHG emissions related to transportation, energy use, waste disposal, wood burning, and use of refrigerants.

Compliance with the City's Commuter Benefits Ordinance, Transportation Management Programs, Transportation Sustainability Fee, Jobs-Housing Linkage Program, and Bicycle Parking, Showers, and Lockers in New and Expanded Buildings requirements would reduce the proposed project's transportation-related emissions.[96] These regulations reduce GHG emissions from single-occupancy vehicles by promoting the use of alternative transportation modes with zero or lower GHG emissions on a per capita basis.

The proposed project would be required to comply with the energy efficiency requirements, commissioning of building energy and water systems requirements, and water use reduction requirements of the City's Green Building Code, Stormwater Management Ordinance, Commercial Water Conservation Ordinance, Water Efficient Irrigation Ordinance, Existing Commercial Buildings Energy Performance

[95] San Francisco Planning Department, Greenhouse Gas Analysis: Compliance Checklist for 1300 Columbus Avenue, June 17, 2019.

[96] Ibid.

Ordinance, and light pollution reduction requirements, which would promote energy and water efficiency, thereby reducing the proposed project's energy-related GHG emissions.[97]

The proposed project's waste-related emissions would be reduced through compliance with the City's Recycling and Compositing Ordinance, Construction and Demolition Debris Recovery Ordinance, and Green Building Code requirements. These regulations reduce the amount of materials sent to a landfill, reducing GHGs emitted by landfill operations. These regulations also promote reuse of materials, conserving their embodied energy[98] and reducing the energy required to produce new materials.

Other regulations, including those limiting refrigerant emissions, would reduce emissions of GHGs. Regulations requiring low-emitting finishes would reduce *volatile organic compounds*.[99] The proposed project would also implement best management practices (BMPs) to prevent illicit discharge into the sewer system. Thus, the proposed project was determined to be consistent with San Francisco's GHG reduction strategy.[100]

The project sponsor is required to comply with these regulations, which have proven effective as San Francisco's GHG emissions have measurably decreased when compared to 1990 emissions levels, demonstrating that the City has met and exceeded Executive Order S-3-05, Assembly Bill 32, and the 2017 Clean Air Plan GHG reduction goals for the year 2020. Furthermore, the city has met its 2017 GHG reduction goal of reducing GHG emissions to 25 percent below 1990 levels by 2017. Other existing regulations, such as those implemented through Assembly Bill 32, will continue to reduce a proposed project's contribution to climate change. In addition, San Francisco's local GHG reduction targets are consistent with the long-term GHG reduction goals of Executive Order S-3-05, Executive Order B-30-15, Assembly Bill 32, Senate Bill 32 and the 2017 Clean Air Plan. Therefore, because the proposed project is consistent with the City's GHG reduction strategy, it is also consistent with the GHG reduction goals of Executive Order S-3-05, Executive Order B-30-15, Assembly Bill 32, Senate Bill 32 and the 2017 Clean Air Plan, would not conflict with these plans, and would therefore not exceed San Francisco's applicable GHG threshold of significance. As such, the proposed project would result in a less-than-significant impact with respect to GHG emissions. No mitigation measures are necessary.

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[97] Compliance with water conservation measures reduce the energy (and GHG emissions) required to convey, pump and treat water required for the project.

[98] Embodied energy is the total energy required for the extraction, processing, manufacture and delivery of building materials to the building site.

[99] While not a GHG, volatile organic compounds are precursor pollutants that form ground-level ozone. Increased ground-level ozone is an anticipated effect of future global warming that would result in added health effects locally. Reducing volatile organic compound emissions would reduce the anticipated local effects of global warming.

[100] San Francisco Planning Department, Greenhouse Gas Analysis: Compliance Checklist for 1300 Columbus Avenue, June 17, 2019.

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

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

Average wind speeds in San Francisco are the highest in the summer and lowest in winter. However, the strongest peak winds occur in winter. Throughout the year, the highest wind speeds occur in midafternoon and the lowest in the early morning. West-northwest, west, northwest, and west-southwest are the most frequent and strongest of primary wind directions during all seasons (referred to as prevailing winds).

Tall buildings and exposed structures can strongly affect the wind environment for pedestrians. A building that stands alone or is much taller than the surrounding buildings can intercept and redirect winds that might otherwise flow overhead and bring them down the vertical face of the building to ground level, where they create ground-level wind and turbulence. These redirected winds can be relatively strong, turbulent, and incompatible with the intended uses of nearby ground-level spaces. A building with a height that is similar to the heights of surrounding buildings typically would cause little or no additional ground-level wind acceleration and turbulence. Thus, 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. In general, new buildings less than approximately 80 feet in height are unlikely to result in substantial adverse effects on ground-level winds such that pedestrians would be uncomfortable. Such winds may exist under existing conditions, but shorter buildings typically do not cause substantial changes in ground-level winds.

The existing hotel building is 40 feet tall and the proposed expansion would include a new 40-foot-tall, four-story wing, with an approximately 16-foot-tall elevator penthouse extending above the roofline.[101] The new building would reach approximately the same height as the existing building on the project site and buildings in the vicinity, including the four-story Holiday Inn Fisherman's Wharf hotel building, located immediately east of the site; the four-story, San Francisco Marriot Fisherman's Wharf hotel building, located immediately south of the site; and the four-story 1255 Columbus Avenue residential mixed-use building, located immediately southwest of the site (see **Figure 2**, p. 8). Additionally, the proposed building's design elements would provide façade articulation, reducing any wind tunnel effects. Therefore, the project would not result in adverse effects on ground-level winds. Accordingly, the proposed project would result in a less-than-significant wind impact.

[101] The hotel wing addition, as measured to the roofline from the midpoint along the Columbus Avenue street frontage would be 39 feet, 5 inches tall and the tallest point of the addition as measured from grade at North Point Street would be 44 feet, 11 inches (see **Figure 5**, p. 11).

Impact C-WI-1: The proposed project, in combination with other past, present, or reasonably foreseeable future projects, would result in less-than-significant cumulative impacts on wind. (Less than Significant)

Based on the information provided above, the proposed project, along with other potential and future development in the vicinity, would not result in a significant wind impact in the project vicinity. It is anticipated that design of the proposed project and other future developments in the neighborhood would be required to comply with the applicable height and bulk requirements, as defined in the planning code. As such, the proposed project, in combination with current and future projects proposed in the vicinity, would not substantially alter the wind patterns that could affect public areas, and cumulative wind impacts would be considered less than significant.

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

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

In 1984, San Francisco voters approved an initiative known as "Proposition K, The Sunlight Ordinance," which was codified as Planning Code section 295 in 1985. Planning Code section 295 generally prohibits new structures above 40 feet in height that would cast additional shadows on open space that is under the jurisdiction of the San Francisco Recreation and Park Commission between one hour after sunrise and one hour before sunset, at any time of the year, unless that shadow would not result in a significant adverse effect on the use of the open space. Public open spaces that are not under the jurisdiction of the recreation and park commission as well as private open spaces are not subject to Planning Code section 295.

The nearest public open space to the project site is the Joseph Conrad Mini Park (the park), located directly across Leavenworth Street from the project site. The approximately 0.09-acre park is triangularly-shaped and generally level. Landscaped areas and trees are located along the park's northern and eastern edges as well as at each corner. A semi-circular grassy area is located along the Columbus Avenue frontage and is bounded by a paved walkway and four benches. The park is primarily used for passive recreational activities.

The proposed project would include a building greater than 40 feet in height;[102] therefore, the planning department prepared a preliminary shadow fan to determine whether the project would have the potential to cast new shadow on nearby parks.[103] The shadow fan indicated the proposed project could cast new shadow on Joseph Conrad Mini Park, and therefore a detailed shadow analysis was prepared to determine if the project would create new shadow that results in an adverse impact.[104]

The shadow analysis examined two shading scenarios – existing and existing plus project. To calculate levels of shading throughout the "solar year" (defined as June 21st through December 20th), snapshot analyses are performed at 15-minute intervals during established daytime hours every seven days throughout the solar year. The difference between the current levels of shading and the levels of shading that would be present with the addition of the proposed project yields the total increase of project generated shadow, measured in annual square-foot-hours of shadow. This increase is also taken as a percentage of the theoretically available annual sunlight (TAAS) for the park, which represent the amount of sun that would fall on the park throughout the year if there were no shading present at any time, to determine whether the new shadows created by the proposed project would fall within or outside potentially permissible limits of increased shading for the park as established by Proposition K.

Based on a TAAS of 14,002,052 square-foot-hours of shadow, the park is currently shaded approximately 16.59 percent of the year. Existing shadows are cast by buildings across Columbus Avenue and Leavenworth Street to the east and west, casting the park in shadow during the morning hours, little to no shadow throughout the midday hours, with shadows arriving from the west in the afternoon.

The shadow analysis included a set of shadow diagrams and calculations to evaluate net new shadows created by the proposed project. The shadow analysis found that the proposed project would result in new shadows falling on the park for a total of between 156 to 168 days of the year only during the morning hours (7:30 a.m. to 9 a.m.) of the winter months (September 28 through March 14), with a duration of between about 15 minutes and 90 minutes. No new shadows would be cast onto the park from March 15 to September 27 as a result of the proposed project. Maximum shading would occur on December 13 and December 28, when the project would cast new shadow over more than half of the park between about 8:15 a.m. and 9:30 a.m. The moment where the largest net new shadow from the project would occur at any point of the year would be at 8:45 a.m. on December 20. The total increase in shading on the park would be approximately 165,197 net new annual shadow square-foot-hours, increasing the square-foot-hours of shadow by 1.18 percent above current levels, for a new annual total shading of 17.77 percent.

Observations of park use indicate that the primary use of the park is transitory in nature and that most visitors walk through the park on their way to other destinations.[105] Visitors that remain in the park were

[102] The hotel wing addition, as measured to the roofline from the midpoint along the Columbus Avenue street frontage would be 39 feet, 5 inches tall and the tallest point of the addition as measured from grade at North Point Street would be 44 feet, 11 inches.

[103] San Francisco Planning Department, Preliminary Shadow Fan Analysis: 1300 Columbus Avenue, July 2017.

[104] Prevision Design, Shadow Analysis Report for the Proposed 1300 Columbus Avenue Project Per SF Planning Code section 295 Standards, October 7, 2019.

[105] Ibid.

observed to rest on the park benches, or sit on the grass either alone or in small groups. Overall use of the park occurs primarily during the midday and afternoon hours, with slightly higher usage during weekends. Although the proposed project would cast new shadows onto the park, the net new shadows cast would be limited to a brief period during the morning hours, when visitor use of the park benches and grassy areas is observed to be low. During the midday and afternoon hours, the majority of the park would remain sunny, both with and without the project. For these reasons, the proposed project would not create new shadow that substantially and adversely affects the use and enjoyment of the park, and this impact would be less than significant.

The proposed project would also shade portions of nearby streets and sidewalks and private property at times within the project vicinity. Shadows on streets and sidewalks would not exceed levels commonly expected in urban areas and would be considered a less-than-significant effect under CEQA. Although occupants of nearby properties may regard the increase in shadow as undesirable, the limited increase in shading of private properties as a result of the proposed project would not be considered a significant impact under CEQA.

Impact C-SH-1: The proposed project, in combination with other past, present, and reasonably foreseeable projects, would not result in cumulatively considerable impacts related to shadow. (Less than Significant)

As discussed above, the proposed project would cast new shadows onto public spaces, including the Joseph Conrad Mini Park; however, these new shadows would be limited to the immediately surrounding roadways and portions of adjacent city blocks and would not combine with cumulative development projects to create or contribute to a cumulative shadow impact because none of the cumulative projects are located within the immediate vicinity of the site. Therefore, this impact would be less than significant.

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

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

The proposed project would be served by the San Francisco Recreation and Parks Department (park department), which administers more than 220 parks, playgrounds, and open spaces throughout the city, as well as recreational facilities including recreation centers, swimming pools, golf courses, and athletic fields, tennis courts, and basketball courts. The project site is located within an intensely developed urban neighborhood, and does not contain large regional park facilities, but includes a number of neighborhood parks and open spaces, as well as other recreational facilities. The 2014 Recreation and Open Space Element of the San Francisco General Plan identified areas of "high-need," which are given highest priority for the construction of new parks and recreation improvements.[106] The project site is located within a high-need area, but is located within proximate distance to some medium- and lower-need areas.

The neighborhood parks and other recreational facilities closest to the project site are the approximately 0.09-acre Joseph Conrad Mini Park, which is located directly across Leavenworth Street from the project site; the approximately 1-acre Aquatic Park, which is located approximately two blocks northwest of the project site; the approximately 0.96-acre Russian Hill Park, which is located two blocks southwest of the project site; and the 0.25-acre Fay Park, which is located three blocks south of the project site. These parks would likely experience increased midday use by the guests and hotel and retail/event workers. As previously discussed in Section E.2, Population and Housing, the proposed project is not likely to attract new employees to San Francisco or substantially increase the population in the vicinity. Therefore, the proposed project is unlikely to result in a substantial increased use of existing regional and neighborhood parks or other recreational facilities within the project vicinity. The proposed project would also not require the construction or expansion of recreational facilities, nor would it physically degrade existing recreational resources. The increase in recreational facilities as a result of the proposed project would be negligible; therefore, proposed project's impacts on recreational facilities would be less than significant.

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

The proposed project would provide an approximately 2,400-square-foot rooftop lounge/event space for hotel guests and would expand the existing ground level open space and court yard areas by approximately 290 square feet, for a total of 8,250 square feet of ground level open space. This open space would partially offset the demand for recreational facilities. In addition, the project site is within walking distance to a number of parks or other recreational facilities, as discussed above. It is anticipated that these existing recreational facilities would be able to accommodate the increase in demand for recreational resources generated by the project because the incremental increase in demand would be minimal given the size of the project and the transient nature of hotel guests (i.e., the project would not increase the residential population in the area). For these reasons, the construction of new or the expansion of existing recreational facilities, both of which might have an adverse physical effect on the environment, would not be required. This impact would be less than significant, and no mitigation measures are necessary.

[106] San Francisco Planning Department, San Francisco General Plan, Recreation and Open Space Element, April 2014. Available online at: *http://openspace.sfplanning.org/*, accessed July 11, 2018.

Impact C-RE-1: The proposed project, in combination with other past, present, or reasonably foreseeable projects would result in less-than-significant impacts on recreational resources. (Less than Significant)

Cumulative development in the project vicinity would result in an intensification of land uses and a cumulative increase in the demand for recreational facilities and resources. The City has accounted for such growth as part of the recreation and open space element of the general plan. In addition, San Francisco voters passed two bond measures, in 2008 and 2012, to fund the acquisition, planning, and renovation of the City's network of recreational resources. As discussed above, there are numerous neighborhood parks located within several blocks of the project site. It is expected that these existing recreational facilities would be able to accommodate the increase in demand for recreational resources generated by nearby cumulative development projects. For these reasons, the proposed project would not combine with past, present, and reasonably foreseeable future projects in the project vicinity to create a significant cumulative impact on recreational facilities or resources.

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

Impact UT-1: Implementation of the proposed project would not exceed the wastewater treatment capacity of the provider that would serve the project and would not require or result in the relocation

or construction of new or expanded water, wastewater treatment, or stormwater drainage, electric power, natural gas, or telecommunications facilities. (Less than Significant)

Project-related wastewater and stormwater would flow to the city's combined stormwater/sewer system and would be treated to standards contained in the City's National Pollutant Discharge Elimination System (NPDES) Permit for the Southeast Water Pollution Control Plant prior to discharge into San Francisco Bay. The NPDES standards are set and regulated by the San Francisco Bay Area Regional Water Quality Control Board (regional board). Therefore, the proposed project would not conflict with regional board requirements.

Implementation of the proposed project would incrementally increase wastewater flows from the project site due to the introduction of hotel guests within 174 additional rooms and 43 new employees. The proposed project would incorporate water-efficient fixtures, as required by Title 24 of the California Code of Regulations and the San Francisco Green Building Ordinance. Compliance with these regulations would reduce wastewater flows and the amount of potable water used for building functions. The San Francisco Public Utilities Commission's (public utility commission's) infrastructure capacity plans account for projected population and employment growth. The incorporation of water-efficient fixtures into new development is also accounted for by the public utilities commission, because widespread adoption can lead to more efficient use of existing capacity. For these reasons, the population increase associated with the proposed project would not require the construction of new or expansion of existing wastewater treatment facilities.

The project site has been developed since 1970, and with the proposed expansion of the building footprint, in combination with the existing building, would cover the majority of the project site. Implementation of the proposed project would not result in an increase in impervious surfaces. The City's Stormwater Management Ordinance (Ordinance No. 83-10, effective May 22, 2010) requires the proposed project to maintain, reduce, or eliminate the existing volume and rate of stormwater runoff discharged from the project site. To achieve this objective, the proposed project would be required to implement and install appropriate stormwater management systems that retain runoff onsite, promote stormwater reuse, and limit (or eliminate altogether) site discharges from entering the City's combined stormwater/sewer system. This, in turn, would limit the incremental demand on both the collection system and wastewater facilities resulting from stormwater discharges and would minimize the potential for constructing new or expanding existing stormwater drainage facilities.

As discussed in more detail below, the proposed project would result in an incremental increase in the demand for new water supplies, but would not itself result in the need for the construction of new or expanded water treatment facilities or delivery infrastructure.

The project would result in an incremental increase in the demand for electricity, natural gas, and telecommunications, which is not in excess of amounts expected and provided for in the project area by utility service providers.

For these reasons, the utilities demand associated with the proposed project would not exceed the service capacity of the existing providers and would not require the construction of new facilities or expansion of existing facilities. Therefore, this impact would be less than significant.

Impact UT-2: Sufficient water supplies are available to serve the proposed project and reasonably foreseeable future development in normal, dry, and multiple dry years unless the Bay Delta Plan Amendment is implemented; in that event the public utilities commission may develop new or expanded water supply facilities to address shortfalls in single and multiple dry years but this would occur with or without the proposed project. Impacts related to new or expanded water supply facilities cannot be identified at this time or implemented in the near term; instead, the public utilities commission would address supply shortfalls through increased rationing, which could result in significant cumulative effects, but the project would not make a considerable contribution to impacts from increased rationing. (Less than Significant)

The public utilities commission adopted the 2015 Urban Water Management Plan for the City and County of San Francisco. The plan estimates that current and projected water supplies will be sufficient to meet future retail demand through 2035 under normal year, single dry-year and multiple dry-year conditions; however, if a multiple dry-year event occurs, the public utilities commission would implement water use and supply reductions through its drought response plan and a corresponding retail water shortage allocation plan.

In December 2018, the State Water Resources Control Board adopted amendments to the Water Quality Control Plan for the San Francisco Bay/Sacramento-San Joaquin Delta Estuary, which establishes water quality objectives to maintain the health of our rivers and the Bay-Delta ecosystem (the Bay-Delta Plan Amendment). The state water board has stated that it intends to implement the Bay-Delta Plan Amendment by the year 2022, assuming all required approvals are obtained by that time. Implementation of the Bay-Delta Plan Amendment would result in a substantial reduction in the public utilities commission's water supplies from the Tuolumne River watershed during dry years, requiring rationing to a greater degree in San Francisco than previously anticipated to address supply shortages not accounted for in the 2015 Urban Water Management Plan.

The public utilities commission has prepared a memorandum discussing future water supply scenarios given adoption of the Bay-Delta Plan Amendment. As discussed in the memorandum, implementation of the plan amendment is uncertain for several reasons and whether, when, and the form in which the Bay-Delta Plan Amendment would be implemented, and how those amendments could affect the public utilities commission’s water supply, is currently unknown. The memorandum estimates total shortfalls in water supply (that is, total retail demand minus total retail supply) to retail customers through 2040 under three increasingly supply-limited scenarios:

1. Without implementation of the Bay-Delta Plan Amendment wherein the water supply and demand assumptions contained in the 2015 Urban Water Management Plan and the 2009 Water Supply Agreement as amended would remain applicable.

2. With implementation of a voluntary agreement between the public utilities commission and the State Water Resources Control Board that would include a combination of flow and non-flow measures that are designed to benefit fisheries at a lower water cost, particularly during multiple dry years, than would occur under the Bay-Delta Plan Amendment).

3. With implementation of the Bay-Delta Plan Amendment as adopted.

As estimated in the public utilities commission memorandum, water supply shortfalls during dry years would be lowest without implementation and highest with implementation of the Bay-Delta Plan Amendment. Shortfalls under the proposed voluntary agreement would be between those with and without implementation of the Bay-Delta Plan Amendment.

Under these three scenarios, the public utilities commission would have adequate water to meet total retail demands through 2040 in normal years. For single dry and multiple (years 1, 2 and 3) dry years of an extended drought, the public utilities commission memorandum estimates that shortfalls of water supply relative to demand would occur both with and without implementation of the Bay-Delta Plan Amendment. Without implementation of the plan amendment, shortfalls would range from approximately 3.6 to 6.1 mgd or 5 to 6.8 percent shortfall during dry years through the year 2040.

With implementation of the Bay-Delta Plan Amendment, shortfalls would range from 12.3 mgd (15.6 percent) in a single dry year to 36.1 mgd (45.7 percent) in years seven and eight of the 8.5-year design drought based on 2025 demand levels and from 21 mgd (23.4 percent) in a single dry year to 44.8 mgd (49.8 percent) in years seven and eight of the 8.5-year design drought based on 2040 demand.

The proposed project does not require a water supply assessment under the California Water Code. Under sections 10910 through 10915 of the California Water Code, urban water suppliers like the public utilities commission must prepare water supply assessments for certain large "water demand" projects, as defined in CEQA Guidelines section 15155. The proposed would expand an existing hotel use by 174 guest rooms and include 8,100 square feet of ground floor commercial space; as such it does not qualify as a "water-demand" project as defined by CEQA Guidelines section 15155(a)(1) and a water supply assessment is not required and has not been prepared for the project.

While a water supply assessment is not required, the following discussion provides an estimate of the project's maximum water demand in relation to the three supply scenarios. No single development project alone in San Francisco would require the development of new or expanded water supply facilities or require the public utilities commission to take other actions, such as imposing a higher level of rationing across the city in the event of a supply shortage in dry years. Therefore, a separate project-only analysis is not provided for this topic. The following analysis instead considers whether the proposed project in combination with both existing development and projected growth through 2040 would require new or expanded water supply facilities, the construction or relocation of which could have significant cumulative impacts on the environment. It also considers whether a high level of rationing would be required that could have significant cumulative impacts. It is only under this cumulative context that development in San Francisco could have the potential to require new or expanded water supply facilities or require the public utilities commission to take other actions, which in turn could result in significant physical environmental impacts related to water supply. If significant cumulative impacts could result, then the analysis considers whether the project would make a considerable contribution to the cumulative impact.

Based on guidance from the California Department of Water Resources and a citywide demand analysis, the public utilities commission has established 50,000 gallons per day as an equivalent project demand for projects that do not meet the definitions provided in CEQA Guidelines section 15155(a)(1). The development proposed by the project (174 new hotel rooms and 8,100 square feet of retail space) would represent approximately 35 percent of the 500-unit limit (assuming that hotel rooms are equivalent to

residential units) and less than 2 percent of the 500,000 square feet of commercial space provided in section 15155(1)(A) and (B), respectively. In addition, the proposed project would incorporate water-efficient fixtures as required by Title 24 of the California Code of Regulations and the city's Green Building Ordinance. It is therefore reasonable to assume that the proposed project would result in an average daily demand of less than 50,000 gallons per day of water.

The public utilities commission has prepared estimates of total retail demand in five-year intervals from 2020 through 2040. Assuming the project would demand no more than 50,000 gallons of water per day (or 0.05 mgd), **Table 17, Proposed Project Water Demand Relative to Total Retail Demand,** compares this maximum with the total retail demand from 2020 through 2040. At most, the proposed project's water demand would represent a small fraction of the total projected retail water demand, ranging from 0.07 to 0.06 percent between 2020 and 2040. As such, the project's water demand is not substantial enough to require or result in the relocation or construction of new or expanded water facilities the construction or relocation of which could cause significant environmental effects.

Table 17: Proposed Project Water Demand Relative to Total Retail Demand (mgd)

	2020	2025	2030	2035	2040
Total Retail Demand	72.1	79	82.3	85.9	89.9
Total Demand of Proposed Project	0.05	0.05	0.05	0.05	0.05
Total Demand of Proposed Project as Percentage of Total Retail Demand	0.07%	0.06%	0.06%	0.06%	0.06%

San Francisco Public Utilities Commission, Technical Memorandum to Lisa Gibson, Environmental Review Officer, San Francisco Planning Department – Environmental Planning Division, *Maximum water demand for smaller projects and potential water supply scenarios,* May 31, 2019.

Sufficient water supplies are available to serve the proposed project and reasonably foreseeable future development in normal, dry, and multiple dry years unless the Bay-Delta Plan Amendment is implemented. As indicated above, the proposed project's maximum demand would represent less than 0.06 percent of the total retail demand in 2040 when implementation of the Bay-Delta Plan Amendment would result in a retail supply shortfall of up to 49.8 percent in a multi-year drought. The public utilities commission has indicated that it is accelerating its efforts to develop additional water supplies and explore other projects that would increase overall water supply resilience in the case that the Bay-Delta Plan Amendment is implemented. The public utilities commission has identified possible projects that it will study, but it has not determined the feasibility of the possible projects, has not made any decision to pursue any particular supply projects, and has determined that the identified potential projects would take anywhere from 10 to 30 years or more to implement. The potential impacts that could result from the construction and/or operation of any such water supply facility projects cannot be identified at this time. In any event, under such a worst-case scenario, the demand for the public utilities commission to develop new or expanded dry-year water supplies would exist regardless of whether the proposed project is constructed.

Given the long lead times associated with developing additional water supplies, in the event the Bay-Delta Plan Amendment were to take effect sometime after 2022 and result in a dry-year shortfall, the expected action of the public utilities commission for the next 10 to 30 years (or more) would be limited to requiring

increased rationing. As discussed in the public utilities commission memorandum, the public utilities commission has established a process through its Retail Water Shortage Allocation Plan for actions it would take under circumstances requiring rationing. The level of rationing that would be required of the proposed project is unknown at this time. Both direct and indirect environmental impacts could result from high levels of rationing. However, the small increase in potable water demand attributable to the project compared to citywide demand would not substantially affect the levels of dry-year rationing that would otherwise be required throughout the city. Therefore, the proposed project would not make a considerable contribution to a cumulative environmental impact caused by implementation of the Bay-Delta Plan Amendment.

Impact UT-3: The proposed project would not generate solid waste in excess of state or local standards, would not impair the attainment of solid waste reduction goals, and would comply with statutes, regulations, and reduction goals concerning solid waste. (Less than Significant)

In September 2015, the City entered into a landfill disposal agreement with Recology, Inc. for disposal of all solid waste collected in San Francisco, at the Recology Hay Road Landfill in Solano County, through September 2024 or until 3.4 million tons have been disposed, whichever occurs first. The city would have an option to renew the agreement for a period of six years or until an additional 1.6 million tons have been disposed, whichever occurs first.[107] The Recology Hay Road Landfill is permitted to accept up to 2,400 tons per day of solid waste. At that maximum permitted rate, the landfill has the capacity to accommodate solid waste until approximately 2034. Under existing conditions, the landfill receives an average of approximately 1,850 tons per day from all sources, with approximately 1,200 tons per day from San Francisco, which includes residential and commercial waste and demolition and construction debris that cannot be reused or recycled[108] (see discussion below). At the current rate of disposal, the landfill closure has operating capacity until 2041. The city's contract with the Recology Hay Road Landfill will extend until 2031 or when the city has disposed 5 million tons of solid waste, whichever occurs first. At that point, the city would either further extend the landfill contract or find and entitle an alternative landfill site.

The project's population is part of the population growth taken into account in the San Francisco General Plan 2014 Housing Element Update, as discussed under Section E.2, Population and Housing, and therefore can be assumed to have been taken into account in waste management planning. San Francisco set a goal of 75 percent solid waste diversion by 2010, which it exceeded at 80 percent diversion, and currently has a goal of 100 percent solid waste diversion or "zero waste" to landfill or incineration by 2020. San Francisco Ordinance No. 27-06 requires mixed construction and demolition debris to be transported by a Registered Transporter and taken to a Registered Facility that must recover for reuse or recycling and divert from landfill at least 65 percent of all received construction and demolition debris. San Francisco's Mandatory Recycling and Composting Ordinance No. 100-09 requires all properties and persons in the City to separate their recyclables, compostables, and landfill trash.

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[107] San Francisco Planning Department, Agreement for Disposal of San Francisco Municipal Solid Waste at Recology Hay Road Landfill in Solano County, Final Negative Declaration, Planning Department Case No. 2014.0653, May 21, 2015, *http://sfmea.sfplanning.org/2014.0653E_Revised_FND.pdf*, accessed July 2019.

[108] CalRecycle, 2010, Jurisdiction diversion/disposal rate detail. *http://www.calrecycle.ca.gov/LGCentral/reports/diversionprogram/JurisdictionDiversionDetail.aspx?JurisdictionID=438&Year=2010*, accessed July 2019.

The proposed project would incrementally increase total city waste generation; however, the proposed project would be required to comply with San Francisco ordinance numbers 27-06 and 100-09. Due to the existing and anticipated increase of solid waste recycling in the city and the agreement with Recology for diversion of solid waste to the Hay Road Landfill, any increase in solid waste resulting from the proposed project would be accommodated by the existing landfill. Thus, the proposed project would have less-than-significant impacts related to solid waste.

Impact C-UT-1: The proposed project, in combination with past, present, and reasonably foreseeable future projects, would not result in a cumulative impact on utilities and service systems. (Less than Significant)

The proposed project would not substantially impact utility supply or service. Nearby development would not contribute to a cumulatively substantial effect on the utility infrastructure within the project area. Furthermore, existing service management plans address anticipated growth in the surrounding area and the region. For these reasons, the proposed project would not combine with past, present, and reasonably foreseeable future projects in the project vicinity to create a significant cumulative impact on utilities and service systems.

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

Impact PS-1: The proposed project would increase demand for police and fire protection services but would not require construction of new or physically altered facilities associated with the provision of such service that could cause significant environmental impacts. (Less than Significant)

The project site currently receives emergency services from the San Francisco Fire Department, which includes fire station 28 at 1814 Stockton Street, approximately 0.6 miles southeast of the project site, and the San Francisco Police Department, Central Station at 766 Vallejo Street, which is 0.8 miles south of the project site. The proposed project would result in an 87,620-square-foot expansion of the existing hotel building with development of a new, four-story hotel wing with 174 new guestrooms, 8,100 square feet of

ground-level retail, a 2,400-square-foot roof deck, 290 square feet of new ground-floor open space uses, and 43 new employees. Implementation of the proposed project could incrementally increase demand for police and fire protection from the project site due to the introduction of approximately 43 employees and up to 696 guests.[109] This increase would not be substantial in light of the existing demand for police and fire protection in the city and relative to the number of area-wide residents and employees in the project vicinity, as described in Section E.2, Population and Housing. Because the proposed project is located in proximity to existing police and fire protection services and the proposed project would not substantially increase population in the area, the impacts would be less than significant.

Impact PS-2: The proposed project could indirectly increase the population of school-aged children, but these new students would be accommodated within existing school facilities and would not require new or physically altered school facilities. (Less than Significant)

The closest public school to the project site is Francisco Middle School at 2190 Powell Street, located approximately 0.2 miles southeast of the project site. The proposed project does not include any residential uses. It is estimated that the proposed project would create a demand for approximately 43 new employees, and is not likely to attract new employees to San Francisco or substantially increase the population in the vicinity. Since the proposed project would not likely generate new students, the project would not increase the need for new or expanded school facilities and the proposed project would have a less-than-significant impact on public schools.

Impact PS-3: The proposed project would increase demand for other government services, but not to the extent it would require new or physically altered other government services. (Less than Significant)

Similar to Impacts PS-1 and PS-2, employees of the proposed project may use existing government services, including libraries, but this increase in demand would be small compared with demand from the existing population and overall service capacity. In addition, most hotel guests are likely to visit the area for a short time, and are unlikely to generate much demand for public services such as libraries. The proposed project would not be of such a magnitude that the demand could not be reasonably accommodated by existing facilities. Therefore, the project would not affect government services to the extent that new or physically altered government facilities would be required. This impact would be less than significant.

Impact C-PS-1: The proposed project, in combination with past, present, and reasonably foreseeable future projects, would not result in a cumulative impact on public services. (Less than Significant)

Cumulative development in the project vicinity would result in an intensification of land uses and a cumulative increase in the demand for fire protection, police protection, school services, and other public services. The fire department, the police department, the school district, and other city agencies have accounted for such growth in providing public services to the residents of San Francisco. For these reasons, the proposed project would not combine with past, present, and reasonably foreseeable future projects in

[109] The total increase in the number of guests is conservatively based on a maximum occupancy of 4 guests per 174 guest rooms, as set by the San Francisco Fire Code.

the project vicinity to create a significant cumulative impact on public services, and this impact would be less than significant.

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

The project area does not include riparian habitat or other sensitive natural communities, as defined by the California Department of Fish and Wildlife and the U.S. Fish and Wildlife Service. The project area does not contain any wetlands, as defined by section 404 of the Clean Water Act. The project site is not located within the jurisdiction of an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan. Therefore, Topics E.14(b), E.14(c), and E.14(f) will not be discussed further in this section.

Impact BI-1: The proposed project would not have a substantial adverse effect, either directly or through habitat modifications, on any special-status species. (No Impact)

The project site is located in a dense urban environment with high levels of human activity. Only common bird species are likely to nest in the area. The project site is currently used as a hotel, and is completely covered by buildings or paved with impervious surfaces. Therefore, the project site does not support, or provide habitat for, any special-status plant or animal species.

The 20 existing trees along the site's Leavenworth, North Point, and Jones streets frontages would be retained and protected during construction of the proposed project. The proposed project would include a total of six new street trees along the project site street frontages, including two on Columbus Avenue, two on Beach Street, one on North Point Street, and one on Jones Street, for a total of 26 street trees at project completion. No special-status species are known to occur at the project site. The project would therefore have no impacts on special-status species.

Impact BI-2: The project would not interfere with the movement of native resident or wildlife species or with established native resident or migratory wildlife corridors. (Less than Significant)

Structures in an urban setting may present risks for birds as they traverse their migratory paths due to building location and/or features. The City has adopted guidelines to address this issue and provided regulations for bird-safe design within the city.[110] The regulations establish bird-safe standards for new building construction, additions to existing buildings, and replacement façades to reduce bird mortality from circumstances that are known to pose a high risk to birds and are considered to be "bird hazards." The two circumstances regulated are: (1) location-related hazards where the siting of a structure inside or within 300 feet of an Urban Bird Refuge (open spaces that are 2 acres and larger and dominated by vegetation or open water) creates an increased risk to birds, and (2) feature-related hazards, which may increase risks to birds regardless of where the structure is located. For new building construction where the location-related standard would apply, the façade requirements include no more than 10 percent untreated glazing and minimal lighting. Any lighting that is used must be shielded and prevented from resulting in any uplighting. Feature-related hazards include free-standing glass walls, wind barriers, skywalks, balconies, and greenhouses on rooftops that have unbroken glazed segments 24 square feet or larger in size. Any structure that contains these elements must treat 100 percent of the glazing.

The project site is not located within 300 feet of an Urban Bird Refuge. The standards for location-related hazards would therefore not apply. The project would include a glass windscreen surrounding the rooftop deck that would include unbroken glazed segments larger than 24 square feet in size. Therefore, in compliance with the feature-related hazards requirements of the City's Standards for Bird Safe Buildings, the proposed project would be required to treat 100 percent of the glazing, which would ensure that impacts related to hazards for migratory birds would be less than significant.

The project would also be required to comply with the California Fish and Game Code and the Migratory Bird Treaty Act (migratory bird act), which protect special-status bird species. Existing street trees could

[110] San Francisco Planning Department, *Standards for Bird Safe Buildings*, 2011. Available: *https://sfplanning.org/standards-bird-safe-buildings*, accessed July 2019.

support native nesting birds that are protected under the California Fish and Game Code or the migratory bird act. Although the existing street trees surrounding the project site 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 migratory bird act would ensure that there would be no loss of active nests or bird mortality. The requirements include one or more of the following for construction that takes place during the annual bird nesting season (January 15–August 15):

- Preconstruction surveys are required to be 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 any vegetation that is to be removed for the construction to be undertaken.

- Any nests that are identified are required to be avoided, and the qualified biologist must establish a construction-free buffer zone, which is to be maintained until the nestlings have fledged.

Because the project would be subject to and would comply with City-adopted regulations for bird-safe buildings and federal and State migratory and nesting bird regulations, which are already required, the project would not interfere with the movement of native resident or wildlife species or with established native resident or migratory wildlife corridors. The impacts would be less than significant.

Impact BI-3: The proposed project would not conflict with the City's local tree ordinance. (Less than Significant)

The City's Urban Forestry Ordinance, public works code sections 801 et. seq., requires a permit from public works to remove any protected trees. Protected trees include landmark trees, significant trees, or street trees located on private or public property anywhere within the territorial limits of the City and County of San Francisco.

The proposed project does not involve the removal of any existing trees. The proposed project would retain the 20 existing street trees surrounding the project site and would plant six new street trees. Because the proposed project would not conflict with the City's local tree ordinance, this impact would be less than significant.

Impact C-BI-1: The proposed project, in combination with past, present, and reasonably foreseeable future projects, would not result in a cumulative impact related to biological resources. (Less than Significant)

As with the proposed project, nearby cumulative development projects would also be subject to federal, state, and local regulations related to biological resources. As with the proposed project, compliance with these ordinances would reduce the effects of development projects to less-than-significant levels.

The proposed project would not modify any natural habitat and would have no impact on any candidate, sensitive, or special-status species, any riparian habitat, or other sensitive natural community; and/or would not conflict with any local policy or ordinance protecting biological resources or an approved conservation plan. For these reasons, the proposed project would not have the potential to combine with past, present, and reasonably foreseeable future projects in the project vicinity to result in a significant

cumulative impact related to biological resources. Therefore, there would be no cumulative impacts on biological resources.

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

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

CEQA does not require lead agencies to consider how existing hazards or conditions might impact a project's users or residents, except for specified projects or where the project would significantly exacerbate an existing environmental hazard. Accordingly, hazards resulting from a project that places development in an existing or future seismic hazard area or an area with unstable soils are not considered impacts under CEQA unless the project would significantly exacerbate the seismic hazard or unstable soil conditions. Thus, the analysis below evaluates whether the proposed project would exacerbate future seismic hazards or unstable soils at the project site and result in a substantial risk of loss, injury, or death. The impact is considered significant if the proposed project would exacerbate existing or future seismic hazards or unstable soils by increasing the severity of these hazards that would occur or be present without the project.

This section describes the geology, soils, and seismicity characteristics of the project area as they relate to the proposed project, and relies on the information and findings provided in a *geotechnical investigation* that was conducted for the project site and proposed project.[111] The geotechnical investigation included a site visit, a review of available geologic and geotechnical data for the site vicinity, an excavation of a test pit to evaluate foundation stiffness, an engineering analysis of the proposed project in the context of geologic and geotechnical site conditions, and project-specific design and construction recommendations.

The project site slopes gently from approximately 5 to 15 feet above mean sea level. The existing approximately 12-foot deep basement slab which underlies the entirety of the project site is anticipated to be underlain by about 10 feet of silt consisting of interbedded layers of medium-dense to dense sand, loose- to medium-dense silty sand, and medium-stiff to stiff clay with variable amounts of silt and sand. The fill is underlain by medium-dense to dense sand with variable silt content that extends to depths of about 18 to 22 feet below ground surface (bgs). The sand is underlain by medium-stiff marine clay, known locally as Bay Mud, which extends to a depth of about 32 to 41 feet bgs. A very dense sand layer was encountered below the Bay Mud between depths of 32 to 46 feet bgs, and the estimated depth of the top of bedrock is approximately 42 to 50 feet bgs. Groundwater is estimated to be at a depth of approximately 12 feet bgs, with a seasonal fluctuation of 1 to 3 feet.

The proposed project would require the excavation of approximately 820 cubic yards to a depth of 6 feet below the existing basement to accommodate foundations. It is anticipated that the proposed foundation system would utilize either auger cast-in-place piles and torque-down-piles or micropiles that would extend to a maximum depth of approximately 70 feet below the existing basement slab. The micropiles would support the column/footing bases that would be installed throughout the existing basement garage in several dozen locations. A new post tension slab would hover approximately 8 to 10 inches over the existing slab. The new slab would be designed to support the new load and the existing slab would provide form support during installation of the new slab and then would function as a non-support ceiling only.

Auger cast-in-place piles are typically 16 inches in diameter, torque-down-piles are typically 12.75 inches in diameter, and micropiles are typically 5 to 12 inches in diameter. The actual width and depth of the micropiles would be determined in the field by the geotechnical engineer during micropile installation. As described below, the project sponsor would be required to comply with the San Francisco Building Code.

[111] Rockridge Geotechnical, Inc., Preliminary Geotechnical Investigation, Proposed Hotel Addition, Fisherman's Wharf Holiday Inn, 1300 Columbus Avenue, San Francisco, California, May 21, 2018.

As part of the building permit review process, project plans would be reviewed for conformance with the geotechnical investigation recommendations for the proposed project.

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, strong seismic ground shaking, seismic-related ground failure, or landslides, and would not be located on unstable soil that could result in lateral spreading, subsidence, liquefaction, or collapse. (Less than Significant)

Fault Rupture

There are no known active faults intersecting the project site and the site in not within an Earthquake Fault Zone. Therefore, the potential of surface rupture occurring at the site is very low. As such, the proposed project would not exacerbate the potential for surface rupture and therefore would have no impact on fault ruptures.

Strong Seismic Ground Shaking

The San Francisco Bay Area is a seismically active region. The project site is located approximately 9.5 miles northeast of the San Andreas Fault. According to the U.S. Geological Survey, the overall probability of a magnitude 6.7 or greater earthquake to occur in the San Francisco Bay Area during the next thirty years is 72 percent.[112] Therefore, it is probable that a strong to very strong earthquake would affect the proposed project during its lifetime. The severity of the event would depend on a number of conditions, including distance to the epicenter, depth of movement, length of shaking, and the properties of underlying materials. However, the proposed project would be required to comply with the California Building Code (state building code, California Code of Regulations, Title 24) and the San Francisco Building Code, described in more detail below, which ensure the safety of all new construction in the state and city, respectively. Therefore, the proposed project would not have the potential to exacerbate seismic-related ground shaking, and as a result, would have a less-than-significant impact on strong seismic ground shaking.

Liquefaction and Lateral Spreading

Liquefaction and lateral spreading of soils can occur when ground shaking causes saturated soils to lose strength due to an increase in pore pressure. According to the California Geological Survey, the project site is within a designated liquefaction hazard zone.[113] As a result, site design and construction must comply with the Seismic Hazards Mapping Act (seismic hazard act),[114] its implementing regulations, and the California Department of Conservation's guidelines for evaluating and mitigating seismic hazards. The

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[112] U.S. Geological Survey, *What is the Probability that an Earthquake will Occur in the Los Angeles Area? In the San Francisco Bay Area?* Available: *https://www.usgs.gov/faqs/what-probability-earthquake-will-occurlos-angeles-area-san-francisco-bay-area?qt-news_science_products=0#qt-news_science_products*, accessed July 2019.

[113] California Geological Survey, State of California Seismic Hazard Zones, City and County of San Francisco (Map Scale 1:24,000), November 17, 2000.

[114] The Seismic Hazards Mapping Act is found in Public Resources Code section 2690, *et seq.*

seismic hazard act, enacted in 1990, protects public safety from the effects of strong ground shaking, liquefaction, landslides, or other ground failures or hazards caused by earthquakes. In addition to the seismic hazard act, adequate investigation and mitigation of failure-prone soils is also required by the mandatory provisions of the California Building Code. The San Francisco Building Code has adopted the state building code with certain local amendments. The regulations implementing the seismic hazard act include criteria for approval of projects within seismic hazard zones that require that a project be approved only when the nature and severity of the seismic hazards at the site have been evaluated in a geotechnical report and appropriate mitigation measures have been proposed and incorporated into the project, as applicable.

The proposed project is required to conform to the local building code, which ensures the safety of all new construction in the city. In particular, Chapter 18 of state building code, Soils and Foundations, provides the parameters for geotechnical investigations and structural considerations in the selection, design and installation of foundation systems to support the loads from the structure above. Section 1803 sets forth the basis and scope of geotechnical investigations conducted. Section 1804 specifies considerations for excavation, grading and fill to protect adjacent structures and prevent destabilization of slopes due to erosion and/or drainage. In particular, section 1804.1, which addresses excavation near foundations, requires that adjacent foundations be protected against a reduction in lateral support as a result of project excavation. This is typically accomplished by underpinning or protecting said adjacent foundations from detrimental lateral or vertical movement, or both. Section 1807 specifies requirements for foundation walls, retaining walls, and embedded posts and poles to ensure stability against overturning, sliding, and excessive pressure, and water lift including seismic considerations. Sections 1808 (foundations) and 1810 (deep foundations) specify requirements for foundation systems such that the allowable bearing capacity of the soil is not exceeded and differential settlement is minimized based on the most unfavorable loads specified in Chapter 16, Structural, for the structure's seismic design category and soil classification at the project site.

The building department would review the project-specific geotechnical report during its review of the building permit for the project. In addition, building department may require additional site specific soils report(s) through the building permit application process, as needed. The building department requirement for a geotechnical report and review of the building permit for conformance with recommendations in the geotechnical report(s) pursuant to building department's implementation of the San Francisco Building Code, local implementing procedures, and state laws, regulations and guidelines would ensure that the proposed project would not exacerbate the potential for seismic-related ground failure. Therefore, impacts would be less than significant.

Landslides

According to the California Geological Survey, the project site is not within a designated earthquake-induced landslide hazard zone.[115] Nevertheless, as previously discussed, the proposed project would be required to comply with the California Building Code and the San Francisco Building Code, which would

[115] California Geological Survey, State of California Seismic Hazard Zones, City and County of San Francisco (Map Scale 1:24,000), November 17, 2000.

ensure that the proposed project would not exacerbate the potential for landslide hazards. Therefore, impacts would be less than significant.

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

The project site is fully developed and entirely occupied by the existing hotel and surface pavements. For this reason, the proposed project would not result in the loss of topsoil. Excavation activities for installation of the foundation would disturb soil to a depth of 70 feet below the existing basement, which could create the potential for windborne and waterborne soil erosion. Sloping terrain is more susceptible to soil erosion than flat terrain. Since the project site is flat, construction activities would not result in substantial soil erosion. In addition, the construction contractor would be required to implement best management practices to prevent erosion and discharge of sediment into construction site stormwater runoff (see Section E.16, Hydrology and Water Quality). This impact would be less than significant, and no mitigation measures are necessary.

Impact GE-3: The project site would not be located on a geologic unit or soil that is unstable, or that could become unstable as a result of the project. (Less than Significant)

The project site and adjacent sites do not include hills or cut slopes that are likely to be subject to landslide. However, as discussed above in under Impact GE-1, the project site is within a state-designated liquefaction hazard zone and, as a result, the proposed project would be required to comply with the Seismic Hazards Mapping Act, as well as the mandatory provisions of the California Building Code and San Francisco Building Code. Adherence to these requirements would ensure that the project sponsor adequately addresses any potential impacts related to unstable soils as part of the design-level geotechnical investigation that would be prepared for the proposed project. Therefore, any potential impacts related to unstable soils would be less than significant, and no mitigation measures are necessary.

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)

Expansive soils expand and contract in response to changes in soil moisture, most notably when nearby surface soils change from saturated to a low-moisture content condition and back again. The expansion potential of the project site soil, as measured by its plasticity index, has not yet been determined. Nonetheless, the San Francisco Building Code would require an analysis of the project site's potential for soil expansion impacts and, if applicable, implementation of measures to address them as part of the design-level geotechnical investigation prepared for the proposed project. Therefore, potential impacts related to expansive soils would be less than significant, and no mitigation measures are necessary.

Impact GE-5: The proposed project would not substantially change the topography or any unique geologic or physical features of the site. (No Impact)

The project site is relatively flat and currently developed with the existing hotel building and associated parking area that cover the entire site; there are no unique geologic or physical features at the project site. Therefore, the proposed project would have no impact on the general topography or any unique geological or physical features of the site.

Impact GE-6: The proposed project would not directly or indirectly destroy a unique paleontological resource or site. (Less than Significant)

Paleontological resources include fossilized remains or traces of mammals, plants, and invertebrates, as well as their imprints. Such fossil remains, as well as the geological formations that contain them, are also considered a paleontological resource. Together, they represent a limited, non-renewable scientific and educational resource. To identify impacts on paleontological resources, the paleontological sensitivity of geologic units present within the project site were identified. Paleontological sensitivity is an indicator of the likelihood of a geologic unit to yield fossils.[116] The fossil-yielding potential of geologic units in a particular area depends on the geologic age and origin of the units, as well as on the processes they have undergone, both geologic and anthropogenic.[117] The potential to affect fossils varies with the depth and type of disturbance, geologic units on the project site, construction activities, and previous disturbance.

The proposed project would include soil disturbance to a depth of up to 70 feet below the existing basement to install the foundation for the proposed building. Up to 820 cubic yards of soil would be excavated to a depth of 6 feet below the existing basement (currently at approximately 12 feet bgs) to accommodate the new mat slab foundation. The foundation would be installed via primarily auger cast-in-place piles and torque-down piles, with use of micropiles where access is limited. As described above, the project site is underlain with silt to approximately 10 feet below the existing basement, medium dense to dense sand to 18 to 22 feet bgs, and Bay Mud to 32 to 41 feet bgs. Bedrock is located approximately 42 to 50 feet bgs.

The new mat slab foundation would be placed within the fill layer on the site; fill has low sensitivity for paleontological resources. The piles installed to support the mat slab would disturb the sand and Bay Mud layers and reach bedrock. Bay Mud has moderate sensitivity for paleontological resources. The piles that would be installed in Bay Mud would be 3 inches or less in diameter. Therefore, intact spoils that could be screened for fossils are unlikely to be encountered. Due to the soil disturbance for the mat slab in a low sensitivity geologic unit and the diameter of the proposed piles to be drilled in fill, Bay Mud, and bedrock, there is no potential to yield any significant paleontological resources. This impact to paleontological resources would be less than significant.

Impact C-GE-1: The proposed project, in combination with the past, present, and reasonably foreseeable future projects in the vicinity of the project site, would not result in a cumulative impacts related to geology and soils. (Less than Significant)

Geology and soils impacts are generally site-specific and localized. Past, present, and foreseeable cumulative projects could require various levels of excavation or cut-and-fill, which could affect local geologic conditions. As noted above, the San Francisco Building Code regulates construction in the City and County of San Francisco, and all development projects would be required to comply with its requirements to ensure maximum feasible seismic safety and minimize geologic impacts. Site-specific measures would also be implemented, as site conditions warrant, to reduce any potential impacts from

[116] Society of Vertebrate Paleontology. 2010. Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources. Available: *http://vertpaleo.org/Membership/Member-Ethics/SVP_Impact_Mitigation_ Guidelines.aspx*. Accessed: April 18, 2019.

[117] Anthropogenic means caused by human activity.

unstable soils, ground shaking, liquefaction, or lateral spreading. The cumulative development projects identified in the "Cumulative Setting" section above would be subject to the same seismic safety standards and design review procedures applicable to the proposed project, and are not located adjacent to the project site. In addition, cumulative projects would not affect paleontological resources at the site such that there would be a cumulative significant impact. Therefore, the proposed project would not combine with cumulative development projects to create or contribute to a cumulative impact related to geology and soils, and cumulative impacts would be less than significant, and no mitigation measures are necessary.

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

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

Project-related wastewater and stormwater would flow to the City's combined stormwater/sewer system and would be treated to standards contained in the City's NPDES Permit for the Southeast Water Pollution Control Plant prior to discharge into San Francisco Bay. The NPDES standards are set and regulated by the Regional Water Quality Control Board (regional board). Therefore, the proposed project would not conflict with regional board requirements.

As discussed under Section E.15, Geology and Soils, groundwater is estimated to be at a depth of approximately 12 feet below ground surface and would be encountered at the planned excavation depth of 70 feet. However, auger cast-in-place, torque-down-pile, and micropile installation can occur without dewatering, and dewatering for the proposed project is unlikely to be necessary during construction. Nevertheless, if any groundwater is encountered during construction, it would be discharged into the combined stormwater/sewer system subject to the requirements of the San Francisco Sewer Use Ordinance (Ordinance No. 19-92, amended by Ordinance No. 116-97), as supplemented by Department of Public Works Order No. 158170. These regulations require a permit from the Wastewater Enterprise Collection System Division of the San Francisco Public Utilities Commission (public utilities commission). A permit may be issued only if an effective pretreatment system is maintained and operated. Each permit for such discharge shall contain specified water quality standards and may require the project sponsor to install and maintain meters to measure the volume of the discharge to the combined sewer system.

Construction activities such as excavation would expose soil and could result in erosion and excess sediments being carried in stormwater runoff to the combined stormwater/sewer system. In addition, stormwater runoff from temporary onsite use and storage of vehicles, fuels, waste, and other hazardous materials could carry pollutants to the combined stormwater/sewer system if proper handling methods are not employed. Runoff from the project site would drain into the City's combined stormwater/sewer system, ensuring that such runoff is properly treated at the Southeast Treatment Plant before being discharged into San Francisco Bay.

For these reasons, the proposed project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade water quality. This impact would be less than significant, and no mitigation measures are necessary.

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)

As discussed under Section E.15, Geology and Soils, groundwater is approximately 12 feet below ground surface and may be encountered at the planned excavation depth of 70 feet; however, dewatering for the proposed project is unlikely to be necessary during construction due to the proposed foundation type. Nevertheless, if groundwater were encountered during onsite excavation, dewatering activities would be necessary. Construction dewatering, if necessary, would represent a temporary condition on the underlying groundwater table. The project would not require long-term dewatering, and does not propose to extract any underlying groundwater supplies. For these reasons, the proposed project would not deplete

groundwater supplies or substantially interfere with groundwater recharge. This impact would be less than significant, and no mitigation measures are necessary.

Impact HY-3: The proposed project would not result in altered drainage patterns that would cause substantial erosion or flooding or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems. (Less than Significant)

No streams or rivers exist at the project site. Therefore, the proposed project would not alter the course of a stream or river or substantially alter the existing drainage pattern of the project site or area. During the proposed project's construction, a potential for erosion and transportation of soil particles would exist, but as stated above in Impact HY-1, the proposed project would be subject to and be required to comply with regulations that limit the amount of runoff from the project site. The existing project site is completely covered with developed (e.g., impervious) surfaces and structures. The proposed building footprint would also completely cover the project site; thus, project implementation would not result in an increase in impervious surface. Therefore, due to the requirements of the existing regulations and because the proposed project would not increase impervious surfaces at the project site, the proposed project would not result in altered drainage patterns that would cause substantial erosion or flooding or contribute runoff which would exceed the capacity of existing or planned stormwater drainage systems and impacts would be less than significant.

Impact C-HY-1: The proposed project, in combination with the past, present, and reasonably foreseeable future projects in the site vicinity, would result in less-than-significant cumulative impacts on hydrology and water quality. (Less than Significant)

Cumulative development in the project area could result in intensified uses and a cumulative increase in wastewater generation. The public utilities commission has accounted for such growth in its service projections. The cumulative development projects would be required to comply with construction-phase stormwater pollution control and dewatering water quality regulations, if necessary, similar to the proposed project. For these reasons, the proposed project, in combination with other past, present, and reasonably foreseeable future projects, would not result in a cumulatively considerable hydrology and water quality impact.

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

The project site is not located within an airport land use plan area or in the vicinity of a private airstrip, or within an area susceptible to wildland fire. Therefore, Topics E.17(e) and E.17(g) are not applicable.

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

The proposed project's hotel and commercial uses would involve the use of relatively small quantities of hazardous materials such as cleaners and disinfectants for routine purposes. These products are labeled to inform users of potential risks and to instruct them in appropriate handling procedures. Most of these materials are consumed through use, resulting in relatively little waste. For these reasons, the proposed project would not create a significant hazard to the public or the environment through the routine

transport, use, or disposal of hazardous materials. This impact would be less than significant, and no mitigation measures are necessary.

Impact HZ-2: The project site is not included on a list of hazardous materials sites compiled pursuant to Government Code section 65962.5, and the proposed project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. (Less than Significant)

The project site is not on a list of hazardous materials site compiled by the California Department of Toxic Substance Control pursuant to Government Code section 65962.5. However, the project site is located in an area subject to Health Code Article 22A (also known as the Maher Ordinance), meaning that it is known or suspected to contain contaminated soil and/or groundwater.[118] If a proposed project were to disturb at least 50 cubic yards of soil, and the site history indicated that hazardous substances may be present, the proposed project would be required to enroll in the Maher program.

As previously stated, the proposed project would result in the excavation of up to 820 cubic yards of soil. Therefore, the proposed project would be subject to the Maher Ordinance, which is administered and overseen by the Department of Public Health (public health department). The results of soil sampling performed at the project site indicate the shallow fill materials at the site appear to be impacted with lead to a depth of at least three feet below ground surface.[119] Pursuant to the Maher Ordinance, the project sponsor has prepared a Site Mitigation Plan and Dust Control Plan (site mitigation and dust control plan)[120] for construction at the project site. The site mitigation and dust control plan provides a decision framework to manage soil excavated for construction of the foundation, and unanticipated suspect conditions (i.e., unknown structures), if any, encountered during construction. The site mitigation and dust control plan additionally describes residual chemicals of potential concern detected in soil and ground water beneath the site during prior investigations, and protocol to address these chemicals of concern during construction.

Asbestos-Containing Materials

The project site is occupied by a building that was constructed in 1970. To accommodate the proposed expansion, the project would include demolition of the existing two-story hotel entry wing and removal of some exterior walls to connect the existing and proposed new hotel wing. Based on the date of construction of the building, asbestos-containing materials (ACMs) may still be present in building materials that could become airborne as a result of demolition disturbance.

The California Department of Toxic Substance Control considers asbestos hazardous, and removal of ACMs is required prior to demolition or construction activities that could result in disturbance of these materials. Asbestos-containing materials must be removed in accordance with local and state regulations, Bay Area Air Quality Management District (air district), the California Occupational Safety and Health

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[118] San Francisco Planning Department, *Expanded Maher Area Map,* March 2015. Available online at *https://sfplanning.org/ftp/files/publications_reports/library_of_cartography/Maher%20Map.pdf,* accessed July 2019.

[119] San Francisco Department of Public Health, Conditional Site Mitigation Plan and Dust Control Plan Approval, 1300 Columbus Avenue, San Francisco, CA, 94133, EHB-SAM SMED: 1650, November 9, 2018.

[120] Ramboll, Site Mitigation Plan and Dust Control Plan, 1300 Columbus Avenue, May 31, 2018.

Administration (occupational safety and health administration), and California Department of Health Services requirements.

Specifically, 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 California legislature vests the air district with the authority to regulate airborne pollutants, including asbestos, through both inspection and law enforcement, and the air district is to be notified 10 days in advance of any proposed demolition or abatement work. Any asbestos-containing material disturbance at the project site would be subject to the requirements of air district Regulation 11, Rule 2: Hazardous Materials—Asbestos Demolition, Renovation, and Manufacturing. The local office of the occupational safety and health administration must also be notified of asbestos abatement to be carried out. Asbestos abatement contractors must follow state regulations contained in Title 8 of California Code of Regulations section 1529 and sections 341.6 through 341.14, where there is asbestos related work involving 100 gsf or more of asbestos-containing material. 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. The contractor and hauler of the material are required to file a Hazardous Waste Manifest that details the hauling of the material from the site and the disposal of it. Pursuant to California law, the building department would not issue the required permit until the applicant has complied with the requirements described above.

These regulations and procedures already established as part of the building permit review process would ensure that any potential impacts due to asbestos would be reduced to a less-than-significant level.

Lead-Based Paint

Similar to ACMs, lead-based paint could be present at the site, based on the age of the building. Work that could result in disturbance of lead paint must comply with section 3426 of the San Francisco Building Code, Work Practices for Lead-Based Paint on Pre-1979 Buildings and Steel Structures. Where there is any work that may disturb or remove lead paint on the exterior of any building built prior to 1979, section 3426 requires specific notification and work standards, and identifies prohibited work methods and penalties. (The reader may be familiar with notices commonly placed on residential and other buildings in San Francisco that are undergoing re-painting. These notices are generally affixed to a drape that covers all or portions of a building and are a required part of the section 3426 notification procedure.)

Section 3426 applies to the exterior of all buildings or steel structures 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 the interior of residential buildings, hotels, and child care centers. The ordinance contains performance standards, including 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 identifies prohibited practices that may not be used in disturbances 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; protect floors and other horizontal surfaces from work debris during interior 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.

The ordinance also includes notification requirements and requirements for signs. Prior to the commencement of work, the responsible party must provide written notice to the director of the building department, of the address and location of the project; the scope of work, including specific location within the site; 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. Further notice requirements include a Posted Sign notifying the public of restricted access to the work area, a Notice to Residential Occupants, Availability of Pamphlet related to protection from lead in the home, and Notice of Early Commencement of Work (by Owner, Requested by Tenant), and Notice of Lead Contaminated Dust or Soil, if applicable. Section 3426 contains provisions regarding inspection and sampling for compliance by the San Francisco Department of Building Inspection, as well as enforcement, and describes penalties for non-compliance with the requirements of the ordinance.

The proposed partial demolition would also be subject to the occupational safety and health administration's 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. The occupational safety and health administration would require 24-hour notification if more than 100 square feet of materials containing lead would be disturbed.

Implementation of procedures required by section 3426 of the building code and the Lead in Construction Standard would ensure that potential impacts of demolition or renovation of structures with lead-based paint would be less than significant.

Based on mandatory compliance with existing regulatory requirements and the Maher Ordinance, the proposed project would not result in a significant hazard to the public or environment from contaminated soil and/or groundwater, asbestos, or lead-based paint, and the proposed project would result in a less-than-significant impact with respect to these hazards, and no mitigation measures are necessary.

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

The closest public school to the project site is Francisco Middle School, located at 2190 Powell Street approximately 0.5 mile to the southeast. Multiple private schools are located within one-quarter mile of the project site. However, as noted in Impact HZ-2, the project sponsor has prepared site mitigation and dust control plans,[121] which have been submitted to and approved by the San Francisco Department of Public

[121] Ramboll, Site Mitigation Plan and Dust Control Plan, 1300 Columbus Avenue, May 31, 2018.

Health,[122] which would ensure that the proposed project would not emit hazardous emissions, and would not handle hazardous or acutely hazardous materials, substances, or waste. Therefore, this impact would be less than significant, and no mitigation measures are necessary.

Impact HZ-4: The proposed project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan and would not expose people or structures to a significant risk of loss, injury, or death involving fires. (Less than Significant)

San Francisco ensures fire safety primarily through provisions of the Building and Fire Codes. Final building plans would be reviewed and approved by the San Francisco Fire Department (as well as the Department of Building Inspection), to ensure conformance with these provisions. In this way, potential fire hazards, including those associated with hydrant water pressures and emergency access, would be mitigated during the permit review process. Compliance with fire safety regulations would ensure that 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.

Implementation of the proposed project could add incrementally to transportation conditions in the immediate area in the event of an emergency evacuation. As discussed in Section E.5, Transportation and Circulation above, the proposed project's contribution to traffic conditions would not be substantial within the context of the dense urban setting of the project site, and it is expected that project-related traffic would be dispersed within the existing street grid, such that there would be no significant adverse impacts on transportation conditions. Therefore, the proposed project would not impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan. This impact would be less than significant, and no mitigation measures are necessary.

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

Environmental impacts related to hazards and hazardous materials are generally site-specific. Nearby cumulative development projects would be subject to the same fire safety and hazardous materials cleanup ordinances applicable to the proposed project. For these reasons, the proposed project would not combine with past, present, and reasonably foreseeable future projects in the project vicinity to create a significant cumulative impact related to hazards and hazardous materials.

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[122] San Francisco Department of Public Health, Conditional Site Mitigation and Dust Control Plan Approval, 1300 Columbus Avenue, San Francisco, CA 94133, EHB-SAM SMED: 1650, November 9, 2018.

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

All land in San Francisco, including the project site, is designated Mineral Resource Zone 4 (MRZ4) by the California Division of Mines and Geology under the Surface Mining and Reclamation Act of 1975.[123] This designation indicates that there is inadequate information available for assignment to any other mineral resource zone, and thus, the project site is not a designated area of significant mineral deposits. Further, according to the general plan, no significant mineral resources exist in San Francisco. No operational mineral resource recovery sites exist in the project area. Therefore, Topics E.18(a) and E.18(b) are not applicable to the project.

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

Impact EN-1: The proposed project would result in increased energy consumption but would not encourage activities that result in the use of large amounts of fuel, water, or energy or use these in a wasteful manner. (Less than Significant)

[123] California Division of Mines and Geology, *Open File Report 96 03 and Special Report 146, Parts I and II*, 1996. Available: *http://www.conservation.ca.gov/cgs/minerals/mlc/Pages/index.aspx*.

The proposed project would increase the population and intensity of use on the project site but would not exceed anticipated growth in the area. The proposed project would be subject to the energy conservation standards included in the San Francisco Green Building Ordinance. Documentation showing compliance with the ordinance would be required to be submitted with the applications of the building permits, and compliance would be enforced by the Department of Building Inspection. The project also, by its character, would conserve fuel and energy use because it would include an expansion of an existing hotel with 174 new guestrooms, 8,100 square feet of ground-level retail, a 2,400-square-foot roof deck, and 290 square feet of new ground-floor open space uses and would provide hotel and retail uses in an urban area that is accessible by transit and is bicycle and pedestrian friendly. Therefore, the proposed project would not cause a wasteful use of energy, and impacts related to use of fuel, water, and energy would be less than significant.

Impact C-EN-1: The proposed project in combination with other past, present or reasonably foreseeable projects would increase the use of energy, fuel and water resources, but not in a wasteful manner. (Less than Significant)

The demand for energy created by the proposed project would be insubstantial in the cumulative context of citywide demand and would not require an expansion of power facilities. While overall energy demand in California is increasing commensurate with increasing population, the state also is making concerted energy conservation efforts. While the city produces a substantial demand for energy and fuel, both city and state policies seek to minimize increases in demand through conservation and energy efficiency regulations and policies such that energy is not used in a wasteful manner, and the cumulative impacts with respect to energy and fuel use would be less than significant. Because San Francisco is substantially built out, development in the city's urban core focuses on densification, which effectively reduces per capita use of energy and fuel by concentrating utilities and services in locations where they can be used efficiently. Similarly, the City recognizes the need for water conservation and has instituted programs and policies to maximize water conservation. San Francisco has one of the lowest per capita water use rates in the state[124] and routinely implements water conservation measures through code requirements and policy. Therefore, the proposed project, in combination with other past, present, and reasonably foreseeable future projects, would not result in a cumulatively considerable impact related to energy, fuel, and water resources.

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[124] San Francisco Public Utilities Commission, *Water Resources Division Annual Report, Fiscal Year 2017-18*, *https://view.joomag.com/water-resources-division-annual-report-fiscal-year-2017-18-waterresourcesar-fy17-18/0863377001542310828*, accessed September 20, 2019.

Topics:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Not Applicable
20. AGRICULTURE AND FORESTRY 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 Department. 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 Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☐	☒
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?	☐	☐	☐	☐	☒

The project site is located within an urbanized area of San Francisco. No land in San Francisco County has been designated by the California Department of Conservation's Farmland Mapping and Monitoring Program as agricultural land. Because the project site does not contain agricultural uses and is not zoned for such uses, the proposed project would not require the conversion of any land designated as prime farmland, unique farmland, or Farmland of Statewide Importance to nonagricultural use. The proposed project would not conflict with any existing agricultural zoning or Williamson Act contracts, as no lands in San Francisco are zoned agricultural or are under Williamson Act contracts.[125] No land in San Francisco is designated as forest land or as Timberland Production by the California Public Resources Code or Government Code. Therefore, the proposed project would not conflict with zoning for forest land, cause a loss of forest land, or convert forest land to a different use. For these reasons, Topics E.20(a), E.20(b), E.20(c), E.20(d), and E.20(e) are not applicable to the proposed project.

[125] San Francisco is identified as "Urban and Built-Up Land" on the California Department of Conservation, 2008, Important Farmland in California Map, *www.consrv.ca.gov*, accessed July 2019.

Topics:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Not Applicable
21. WILDFIRE. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:					
a) Substantially impair an adopted emergency response plan or emergency evacuation plans?	☐	☐	☐	☐	☒
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☐	☒
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☐	☒
d) Expose people or structures to significant risks including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☐	☒

The City and County of San Francisco and bordering areas within San Mateo County do not have any state responsibility areas for fire prevention or lands classified as very high fire hazard severity zones,[126] therefore, this topic is not applicable. See Section E.17, Hazards and Hazardous Materials, for a discussion of wildland fire risks.

[126] California Board of Forestry and Fire Protection, State Responsibility Area Viewer, 2019. Available at: *https://bofdata.fire.ca.gov/projects-and-programs/state-responsibility-area-viewer/*, accessed July 2019.

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

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

The proposed project would not substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or reduce the number or restrict the range of a rare or endangered plant or animal. As discussed in Section E.3, Cultural Resources, implementation of the proposed project would not result in a substantial adverse change in the significance of an archaeological resource or a tribal cultural resource and would not disturb human remains, with implementation of Mitigation Measures M-CR-2 and M-TC-1. As discussed in Section E.15, Geology and Soils, implementation of the proposed project would not directly or indirectly destroy a unique paleontological resource or site. For these reasons, the proposed project would not result in the elimination of important examples of major periods of California history or prehistory.

As discussed in Section E.6, Noise, Mitigation Measures M-NO-1, M-NO-2, and M-NO-3 would ensure that impacts related to construction and operation period noise and vibration impacts would be less than significant and would not combine with other projects in the vicinity to create cumulative noise impacts. As discussed in Section E.7, Air Quality, implementation of Mitigation Measures M-AQ-2 and M-AQ-4 would ensure that impacts related to construction and operation period air pollutant emissions would be

less than significant and would not result in adverse health effects to people living and working in the area or at the regional level.

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

F. MITIGATION MEASURES AND IMPROVEMENT MEASURES

Mitigation Measure M-CR-2: Archaeological Testing

Based on a reasonable presumption that archeological resources may be present within the project site, the following measures shall be undertaken to avoid any potentially significant adverse effect from the proposed project on buried or submerged historical resources. The project sponsor shall retain the services of a qualified archeological consultant having expertise in California prehistoric and urban historical archeology. The archeological consultant shall undertake an archeological testing program as specified herein. In addition, the consultant shall be available to conduct an archeological monitoring and/or data recovery program if required pursuant to this measure. The archeological consultant's work shall be conducted in accordance with this measure at the direction of the environmental review officer (ERO). All plans and reports prepared by the consultant as specified herein shall be submitted first and directly to the ERO for review and comment, and shall be considered draft reports subject to revision until final approval by the ERO. Archeological monitoring and/or data recovery programs required by this measure could suspend construction of the project for up to a maximum of four weeks. At the direction of the ERO, the suspension of construction can be extended beyond four weeks only if such a suspension is the only feasible means to reduce to a less than significant level potential effects on a significant archeological resource as defined in CEQA Guidelines section 15064.5 (a)(c).

Archeological Testing Program. The archeological consultant shall prepare and submit to the ERO for review and approval an archeological testing plan (ATP). The archeological testing program shall be conducted in accordance with the approved ATP. The ATP shall identify the property types of the expected archeological resource(s) that potentially could be adversely affected by the proposed project, the testing method to be used, and the locations recommended for testing. The purpose of the archeological testing program will be to determine to the extent possible the presence or absence of archeological resources and to identify and to evaluate whether any archeological resource encountered on the site constitutes a historical resource under CEQA.

At the completion of the archeological testing program, the archeological consultant shall submit a written report of the findings to the ERO. If based on the archeological testing program the archeological consultant finds that significant archeological resources may be present, the ERO in consultation with the archeological consultant shall determine if additional measures are warranted. Additional measures that may be undertaken include additional archeological testing, archeological monitoring, and/or an

archeological data recovery program. If the ERO determines that a significant archeological resource is present and that the resource could be adversely affected by the proposed project, at the discretion of the project sponsor either:

a. The proposed project shall be re-designed so as to avoid any adverse effect on the significant archeological resource; or

b. A data recovery program shall be implemented, unless the ERO determines that the archeological resource is of greater interpretive than research significance and that interpretive use of the resource is feasible.

Archeological Data Recovery Program. The archeological data recovery program shall be conducted in accord with an archeological data recovery plan (ADRP). The archeological consultant, project sponsor, and ERO shall meet and consult on the scope of the ADRP prior to preparation of a draft ADRP. The archeological consultant shall submit a draft ADRP to the ERO. The ADRP shall identify how the proposed data recovery program will preserve the significant information the archeological resource is expected to contain. That is, the ADRP will identify what scientific/historical research questions are applicable to the expected resource, what data classes the resource is expected to possess, and how the expected data classes would address the applicable research questions. Data recovery, in general, should be limited to the portions of the historical property that could be adversely affected by the proposed project. Destructive data recovery methods shall not be applied to portions of the archeological resources if nondestructive methods are practical.

The scope of the ADRP shall include the following elements:

- *Field Methods and Procedures.* Descriptions of proposed field strategies, procedures, and operations.

- *Cataloguing and Laboratory Analysis.* Description of selected cataloguing system and artifact analysis procedures.

- *Discard and Deaccession Policy.* Description of and rationale for field and post-field discard and deaccession policies.

- *Interpretive Program.* Consideration of an onsite/off-site public interpretive program during the course of the archeological data recovery program.

- *Security Measures.* Recommended security measures to protect the archeological resource from vandalism, looting, and non-intentionally damaging activities.

- *Final Report.* Description of proposed report format and distribution of results.

Curation. Description of the procedures and recommendations for the curation of any recovered data having potential research value, identification of appropriate curation facilities, and a summary of the accession policies of the curation facilities.

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

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

Nothing in existing State regulations or in this mitigation measure compels the project sponsor and the ERO to accept treatment recommendations of the MLD. However, if the ERO, project sponsor and MLD are unable to reach an Agreement on scientific treatment of the remains and associated or unassociated funerary objects, the ERO, with cooperation of the project sponsor, shall ensure that the remains associated or unassociated funerary objects are stored securely and respectfully until they can be reinterred on the property, with appropriate dignity, in a location not subject to further or future subsurface disturbance.

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

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

Once approved by the ERO, copies of the FARR shall be distributed as follows: California Archaeological 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 Major Environmental Analysis division of the planning department shall receive 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 in or the high

interpretive value of the resource, the ERO may require a different final report content, format, and distribution than that presented above.

Mitigation Measure M-TC-1: Tribal Cultural Resources Interpretive Program

If the ERO determines that a significant archaeological resource is present, and if in consultation with the affiliated Native American tribal representatives, the ERO determines that the resource constitutes a tribal cultural resource (TCR) and that the resource could be adversely affected by the proposed project, the proposed project shall be redesigned so as to avoid any adverse effect on the significant tribal cultural resource, if feasible.

If the ERO determines that preservation-in-place of the TCR is both feasible and effective, then the archaeological consultant shall prepare an archaeological resource preservation plan (ARPP). Implementation of the approved ARPP by the archaeological consultant shall be required when feasible.

If the ERO, in consultation with the affiliated Native American tribal representatives and the project sponsor, determines that preservation-in-place of the tribal cultural resources is not a sufficient or feasible option, the project sponsor shall implement an interpretive program of the TCR in consultation with affiliated tribal representatives. An interpretive plan produced in consultation with the ERO and affiliated tribal representatives, at a minimum, and approved by the ERO would be required to guide the interpretive program. The plan shall identify, as appropriate, proposed locations for installations or displays, the proposed content and materials of those displays or installation, the producers or artists of the displays or installation, and a long- term maintenance program. The interpretive program may include artist installations, preferably by local Native American artists, oral histories with local Native Americans, artifacts displays and interpretation, and educational panels or other informational displays.

Mitigation Measure M-NO-1: Construction Noise Controls

The project sponsor shall develop a set of site-specific noise attenuation measures under the supervision of a qualified acoustical consultant to ensure that maximum feasible noise attenuation will be achieved for the duration of construction activities. Prior to commencement of demolition and construction activities, the project sponsor shall submit the construction noise control plan to the San Francisco Planning Department for review and approval. Noise attenuation measures shall be implemented to meet a goal of not increasing noise levels from construction activities by more than 10 dBA above the ambient noise level at sensitive receptor locations. Noise measures may include, but are not limited to, those listed below. The project sponsor or the project sponsor's contractor shall comply with the following:

1. The construction contractor shall install a 12-foot-high temporary construction barrier to reduce construction noise consistent with the location of the recommended barrier as shown in Figure 13 of the initial study, Figure 2 of the environmental noise and vibration impact assessment and plan sheet A2.1a of the planned unit development application.

2. The construction contractor shall conduct noise monitoring within the first week of major construction phases (e.g., demolition, excavation) to determine the effectiveness of noise-attenuation measures and need for additional measures.

3. The construction contractor shall post signs onsite pertaining to permitted construction days and hours and shall specify complaint procedures, including whom to notify in the event of a noise-related problem, with telephone numbers listed.

4. The construction contractor shall notify the neighbors in advance of the schedule for each major phase of construction and expected loud activities including estimated duration of activity, construction hours, and contact information.

5. The construction contractor shall avoid placing stationary noise-generating equipment (e.g., generators, compressors) within noise-sensitive buffer areas (measured at linear 20 feet) between immediately adjacent neighbors.

6. Where the use of pneumatically powered tools is unavoidable, an exhaust muffler on the compressed air exhaust shall be used, along with external noise jackets on the tools.

7. All construction equipment shall be in good working order and mufflers should be inspected to ensure they function properly. Unnecessary idling of equipment and engines shall be avoided.

Mitigation Measure M-NO-2: Construction Vibration Control

The project sponsor or the project sponsor's contractor shall prohibit vibration-generating construction activities on Wednesdays between the hours of 8 a.m. and 12 p.m., when laser eye surgery is performed at 505 Beach Street (Pacific Vision Institute).

Additionally, a community liaison shall be designated and made available to respond to vibration-related complaints from building occupants at Pacific Vision Institute. Contact information for the community liaison shall be posted in a conspicuous location so that it is clearly visible to building occupants most likely to be disturbed. Through the community liaison, the project sponsor shall provide notification to property owners and occupants of Pacific Vision Institute of construction activities involving equipment that can generate vibration capable of interfering with vibration-sensitive equipment 10 days prior to the start of project construction, informing them of the estimated start date and duration of vibration-generating construction activities. These equipment types include a large bulldozer, or similar equipment, operating within 135 feet of the building; a jackhammer operating within 75 feet of the building; or a loaded truck operating within 125 feet of the building. The community liaison shall manage concerns and complaints resulting from construction vibration. Reoccurring disturbances shall be evaluated by a qualified noise and vibration consultant to ensure that there are no exceedances of the 0.0011 PPV vibration level threshold for vibration-sensitive equipment.

Mitigation Measure M-NO-3: Rooftop Deck Noise Controls

The project sponsor shall implement the following mitigation measures to reduce rooftop deck noise levels in order to meet the requirements of the noise ordinance:

1. The project sponsor shall limit amplified sound on the rooftop deck to no greater than 77 dBA L_{max} at 25 feet from the center of the loudspeaker and be designed with electronic limiters to maintain a noise level of 77 dBA L_{max} at 25 feet.

2. The project sponsor shall orient speakers used on the rooftop deck away from sensitive receptors, including the residential building at 1321 Columbus Avenue and the hotel at 580 Beach Street.

3. All noise generating equipment (e.g., speakers) shall be located at a maximum height of 3 feet above the roof deck.

The project sponsor shall provide documentation demonstrating the combination of measures chosen to achieve the required noise reduction to the planning department prior to the issuance of the certificate of occupancy.

Mitigation Measure M-AQ-2: Construction Air Quality

The project sponsor or the project sponsor's contractor shall comply with the following:

A. *Engine Requirements.*

1. All off-road equipment greater than 25 hp and operating for more than 20 total hours over the entire duration of construction activities shall have engines that meet or exceed either U.S. Environmental Protection Agency (USEPA) or California Air Resources Board (ARB) Tier 2 off-road emission standards, and have been retrofitted with an ARB Level 3 Verified Diesel Emissions Control Strategy. Equipment with engines meeting Tier 4 Interim or Tier 4 Final off-road emission standards automatically meet this requirement.

2. Where access to alternative sources of power are available, portable diesel engines shall be prohibited.

3. Diesel engines, whether for off-road or on-road equipment, shall not be left idling for more than two minutes, at any location, except as provided in exceptions to the applicable state regulations regarding idling for off-road and on-road equipment (e.g., traffic conditions, safe operating conditions). The contractor shall post legible and visible signs in English, Spanish, and Chinese, in designated queuing areas and at the construction site to remind operators of the two minute idling limit.

4. The contractor shall instruct construction workers and equipment operators on the maintenance and tuning of construction equipment, and require that such workers and operators properly maintain and tune equipment in accordance with manufacturer specifications.

B. *Waivers.*

1. The planning department's environmental review officer or designee (ERO) may waive the alternative source of power requirement of Subsection (A)(2) if an alternative source of power is limited or infeasible at the project site. If the ERO grants the waiver, the contractor must submit documentation that the equipment used for onsite power generation meets the requirements of Subsection (A)(1).

2. The ERO may waive the equipment requirements of Subsection (A)(1) if: a particular piece of off-road equipment with an ARB Level 3 VDECS is technically not feasible; the equipment would not produce desired emissions reduction due to expected operating modes; installation of the equipment would create a safety hazard or impaired visibility for the operator; or, there is a compelling emergency need to use off-road equipment that is not retrofitted with an ARB Level 3 VDECS. If the ERO grants the waiver, the contractor must use the next cleanest piece of off-road equipment, according to the following.

Off-Road Equipment Compliance Step-down Schedule

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

How to use the table: If the ERO determines that the equipment requirements cannot be met, then the project sponsor would need to meet Compliance Alternative 1. If the ERO determines that the contractor cannot supply off-road equipment meeting Compliance Alternative 1, then the contractor must meet Compliance Alternative 2. If the ERO determines that the contractor cannot supply off-road equipment meeting Compliance Alternative 2, then the contractor must meet Compliance Alternative 3.
** Alternative fuels are not a VDECS.

C. *Construction Emissions Minimization Plan.* Before starting onsite construction activities, the contractor shall submit a Construction Emissions Minimization Plan (Plan) to the ERO for review and approval. The Plan shall state, in reasonable detail, how the contractor will meet the requirements of section A.

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

2. The project sponsor shall ensure that all applicable requirements of the Plan have been incorporated into the contract specifications. The Plan shall include a certification statement that the contractor agrees to comply fully with the Plan.

3. The contractor shall make the Plan available to the public for review onsite during working hours. The contractor shall post at the construction site a legible and visible sign summarizing the Plan. The sign shall also state that the public may ask to inspect the Plan for the project at any time during working hours and shall explain how to request to inspect the Plan. The contractor shall post at least one copy of the sign in a visible location on each side of the construction site facing a public right-of-way.

D. *Monitoring.* After start of construction activities, the contractor shall submit quarterly reports to the ERO documenting compliance with the Plan. After completion of construction activities and prior to receiving a final certificate of occupancy, the project sponsor shall submit to the ERO a final report summarizing construction activities, including the start and end dates and duration of each construction phase, and the specific information required in the Plan.

Mitigation Measure M-AQ-4: Best Available Control Technology for Diesel Generators

The project sponsor shall ensure that the backup diesel generator 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 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 air resources board verified model and if the air district approves of its use. The project sponsor shall submit documentation of compliance with the air district's New Source Review permitting process (Regulation 2, Rule 2, and Regulation 2, Rule 5) and the emission standard requirement of this mitigation measure to the planning department for review and approval prior to issuance of a permit for a backup diesel generator from any City agency.

Improvement Measure TR-6: Commercial Loading Maneuvers

Hotel staff should facilitate the back-out maneuver from the onsite alley for commercial loading vehicles that do not have audible back-up alarms.

G. PUBLIC NOTICE AND COMMENT

On January 7, 2019 the planning department mailed a notification of project receiving environmental review to owners of properties within 300 feet of the project site, adjacent occupants, neighborhood groups, and other interested parties. One neighborhood comment was received from a business located at 505 Beach Street. The business is an eye surgery center and requested information on the construction vibration impacts of the project. These impacts are discussed in Section E.6, Noise. Additionally, two individuals requested to receive all applications and publications related to the project, but did not provide comments on the project.

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.

Lisa Gibson
Environmental Review Officer
for
John Rahaim
Director of Planning

DATE 10/30/19

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