SAN FRANCISCO
PLANNING DEPARTMENT

Discretionary Review
Abbreviated Analysis
HEARING DATE: APRIL 16, 2020

CONTINUED TO MAY 21, 2020

1650 Mission St.
Suite 400
San Francisco,
CA 94103-2479

Reception:
415.558.6378

Fax:
415.558.6409

Planning
Information:
415.558.6377

Date:	April 9. 2020
Case No.:	**2017-009796DRP**
Project Address:	**1088 Howard Street**
Permit Application:	2018.0702.3483
Zoning:	MUG [Mixed Use - General] 85-X Height and Bulk District
Block/Lot:	3726 / 030-031
Project Sponsor:	Jeremy Schaub 1360 9th Ave. Suite 250 San Francisco, CA 94010
Staff Contact:	David Winslow – (415) 575-9159 David.Winslow@sfgov.org
Recommendation:	**Do Not Take DR and Approve**

PROJECT DESCRIPTION

The project proposes to merge lots 030 and 031 and construct a six-story vertical and horizontal addition (approximately 24,000 square feet) above a one-story commercial building. The resulting building will include 24 residential units.

SITE DESCRIPTION AND PRESENT USE

The site consists of two lots, one which contains an existing one-story plus mezzanine commercial building that covers the entire lot, and the other which is a surface parking lot. Combined the two lots would create a 48'-10" wide' x 83'-1" deep lot. The existing building was built in 1925 and is classified as a contributor to the Western SoMa Residential Historic District. The project proposes to demolish the contributor building while retaining the front façade and the commercial space and mezzanine.

SURROUNDING PROPERTIES AND NEIGHBORHOOD

This block of Howard Street consists of a mix of 2- to 4-story mixed-use and light-industrial buildings, many with full lot coverage, leaving a constrained mid-block open space. The adjacent 4-story corner building has a 10' deep rear yard and a long light well along the northeast interior property line. The Eastern Neighborhoods Plan recognized the need for increased housing density and the ability of major South of Market streets to accommodate greater heights.

BUILDING PERMIT NOTIFICATION

TYPE	REQUIRED PERIOD	NOTIFICATION DATES	DR FILE DATE	DR HEARING DATE	FILING TO HEARING TIME
311 Notice	30 days	December 23, 2019 – January 22, 2020	1.15.2020	4.16. 2020	92 days

HEARING NOTIFICATION

TYPE	REQUIRED PERIOD	REQUIRED NOTICE DATE	ACTUAL NOTICE DATE	ACTUAL PERIOD
Posted Notice	20 days	March 27, 2020	March 27, 2020	20 days
Mailed Notice	20 days	March 27, 2020	March 27, 2020	20 days
Online Notification	20 days	March 27, 2020	March 27, 2020	20 days

PUBLIC COMMENT

	SUPPORT	OPPOSED	NO POSITION
Adjacent neighbor(s)	0	6	0
Other neighbors on the block or directly across the street	0	0	0
Neighborhood groups	0	0	0

DR REQUESTOR

Julian Castaneda of 195 7th Street, adjacent neighbor to the Southwest of the proposed project.

DR REQUESTOR'S CONCERNS AND PROPOSED ALTERNATIVES

1. That the construction will release and disperse toxins from contaminated soil due to the site's former use as a paint manufacturer which will lead to adverse health effects to the neighbors.
2. The variance for exposure per Code Section 140 should not be granted because the limited area of the rear yard will adversely impact neighboring residents by violating the California Fire Code.
3. Loss of light and air from east facing windows;
4. Loss of enjoyment and privacy at roof deck;
5. Noise pollution will exacerbate neighboring residents' health conditions and;
6. The proposed building will impact solar panels;

Proposed alternatives:

1. Provide further analysis from a mutually selected independent testing firm to be publicly available;

2. Creation of a permanent buffer space between the two buildings;
3. Provide air conditioning and purified air filtration to for all units affected by the decrease in air quality;
4. Noise reduction mitigation for the residents adjacent to 1088 Howard;
5. Written assurances to solve mutually shared plumbing problems as they arise.

See attached *Discretionary Review Application*, dated January 15, 2020.

PROJECT SPONSOR'S RESPONSE TO DR APPLICATION

The sponsor has complied with the Urban Design Review Advisory Team (UDAT) and preservation recommendations, in relation to building massing and at the street and rear to address issues related to open space, light and privacy.

See attached *Response to Discretionary Review*, dated February 4, 2020.

ENVIRONMENTAL REVIEW

The Department, pursuant to CEQA, the CEQA Guidelines, and Chapter 31 of the San Francisco Administrative Code, determined that the project is consistent with the project site's development density established by zoning, the community plan, and general plan policies in the Eastern Neighborhoods Rezoning and Area Plans, for which a programmatic environmental impact report was certified. Accordingly, the Department issued a community plan evaluation for the project on December 18, 2019.

DEPARTMENT REVIEW

Since the Project is in the MUG Zoning district, the project is subject to the Urban Design Guidelines – not the Residential Design Guidelines. The Urban Design Advisory Team (UDAT) review found that:

1. The project has been reviewed and shaped by input from Preservation staff and the Urban Design Advisory Team, resulting in the siting, open space, and massing with respect to the existing building and adjacent buildings.
2. The environmental review has adequately taken into account soil contaminants, construction noise, sewer and infrastructure impacts and provided mitigation measures equal to or better than required by various City and State agencies to address these issues. See attached memo Clarifications for Environmental Review for a summary.
3. This building type requires two protected exits to lead directly to the street and does not rely on the rear yard as an area of refuge, or as any other part of the emergency egress system. The requested Variance is for Exposure per Planning Code Section 140.
4. The proposed 735 square foot roof deck provides a portion of the common usable open space for the residents and is located in the central portion of the roof and is buffered by a green roof and the stair and elevator penthouse. It is set back 6′ from the rear building edge and 11′-4″ from the side building edge. Staff deemed the deck to be sized and located so as to not pose exceptional nor extraordinary impacts of privacy. A view of another deck typically is not considered in assessing privacy impacts.
5. The project reciprocates with the adjacent neighbors' light well in a manner that enable the continued function of the neighboring building and consistent with the Department's standard for light wells. Property line windows are generally not protected.

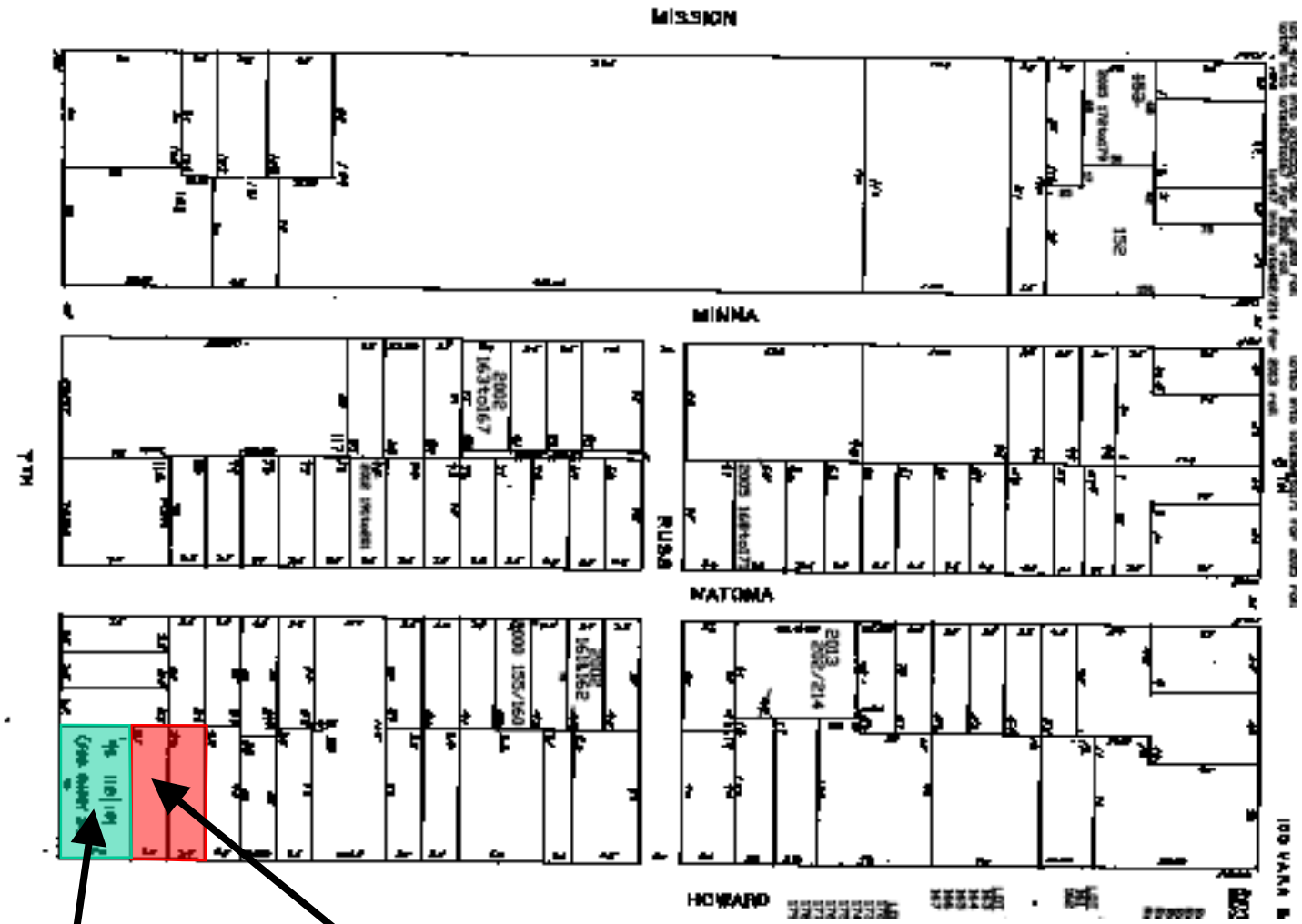
6. Solar panels are not protected by state or local law as doing so would allow them to act as de facto impediments to development.
7. The Department and the Commission is tasked with making land use decisions that affect the built environment, putting aside the health situations of the neighbors. The legal decision that affirmed the Commission's right to take DR in "exceptional and extraordinary circumstances" was based on physical land use incompatibilities, not personal conflicts. Issues and remedies related to infrastructure requested by the DR requestor are outside of the reach of the applicable regulations for this land use decision.

RECOMMENDATION:	**Do Not Take DR and Approve**

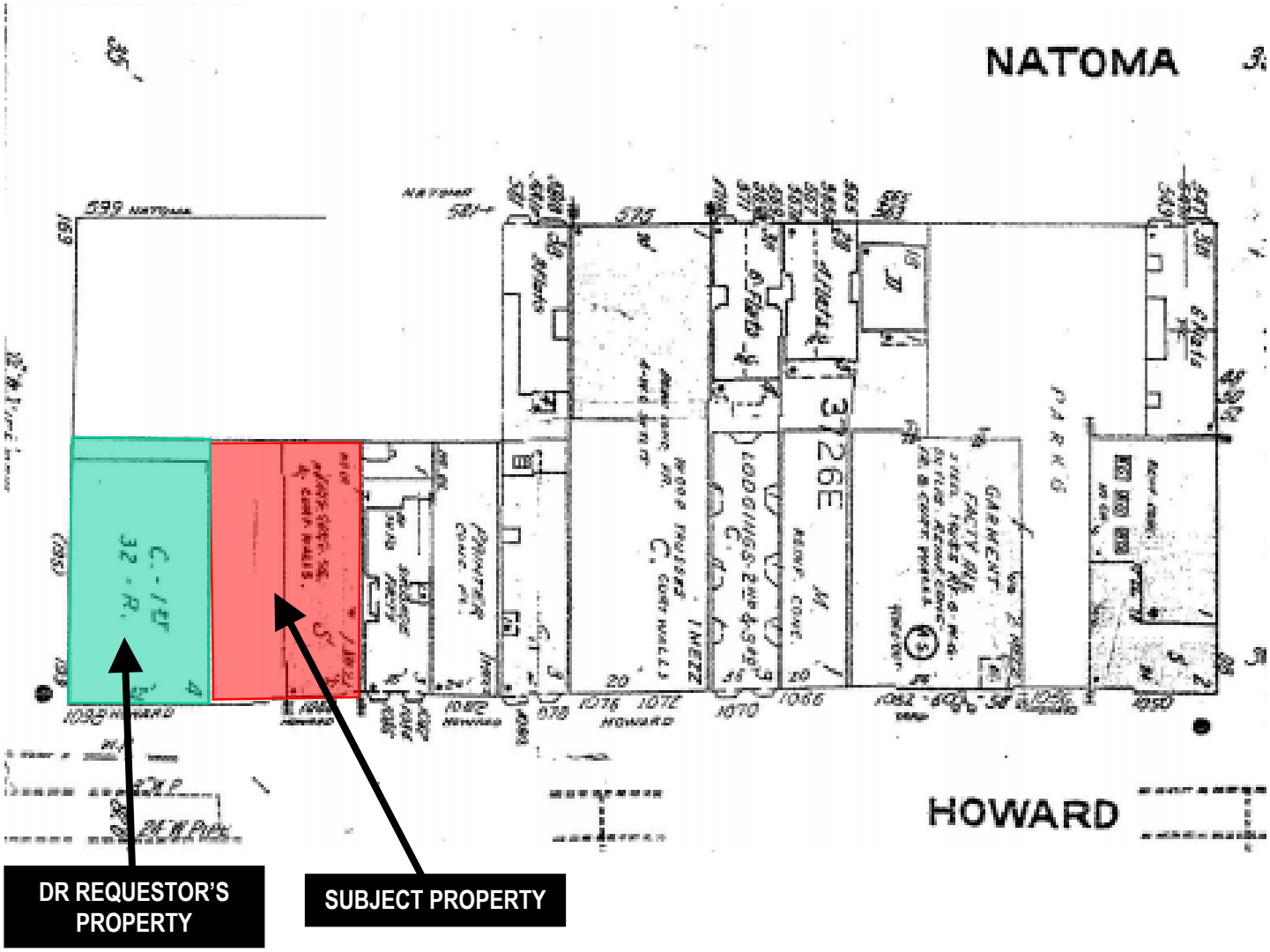
Attachments:
Block Book Map
Sanborn Map
Zoning Map
Aerial Photographs
Context Photographs
Section 311 Notice
CEQA Certificate and MMRP
Clarifications for Environmental Review
DR Application
Response to DR Application dated February 4, 2020
Reduced Plans

Exhibits

Parcel Map

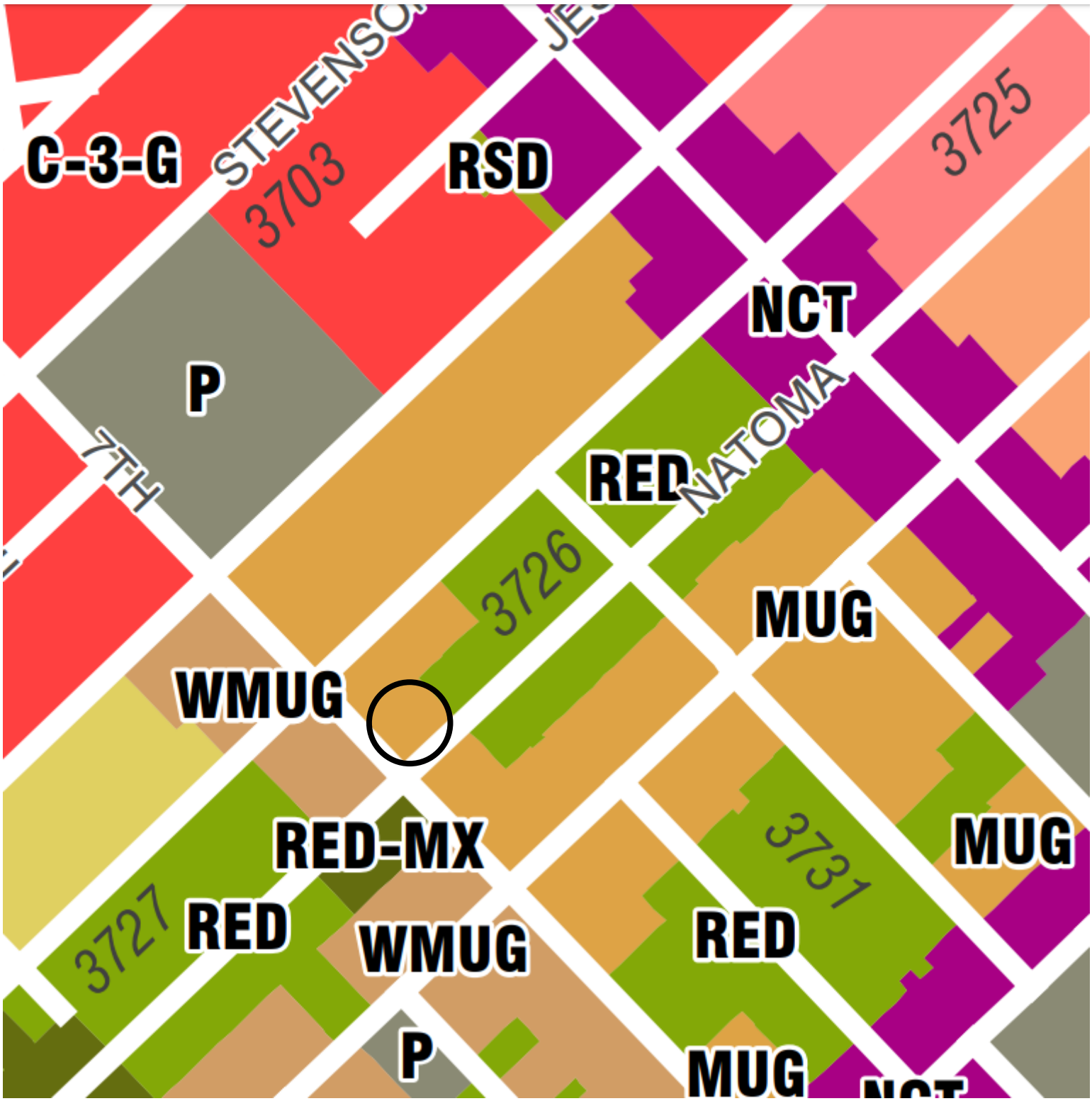

MISSION
MINNA
NATOMA
HOWARD
7TH
8TH
DR REQUESTOR'S PROPERTY
SUBJECT PROPERTY

Sanborn Map*



**The Sanborn Maps in San Francisco have not been updated since 1998, and this map may not accurately reflect existing conditions.*

Zoning Map


C-3-G
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MUG

Aerial Photo

Discretionary Review Hearing
Case Number 2017-009796DRP
1088 Howard Street

Aerial Photo

Aerial Photo

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1088 Howard Street

Aerial Photo

Discretionary Review Hearing
Case Number 2017-009796DRP
1088 Howard Street

Site Photo

SAN FRANCISCO
PLANNING DEPARTMENT
1650 Mission Street Suite 400 San Francisco, CA 94103

NOTICE OF BUILDING PERMIT APPLICATION (SECTION 311)

On **July 2, 2018**, Building Permit Application No. **201807023483** was filed for work at the Project Address below.

Notice Date: December 23, 2019 **Expiration Date: January 22, 2020**

PROJECT INFORMATION		APPLICANT INFORMATION	
Project Address:	**1088 HOWARD ST**	Applicant:	**Jeremy Schaub**
Cross Street(s):	**7th and Russ Streets**	Address:	**1360 9th Ave, Suite 210**
Block/Lot No.:	**3726 / 030-031**	City, State:	**San Francisco, CA**
Zoning District(s):	**MUG /85-X**	Telephone:	**(415) 682-8060**
Record Number:	**2017-009796PRJ**	Email:	**jeremy@slasf.com**

You are receiving this notice as an owner or occupant of property within 150 feet of the proposed project. **You are not required to take any action.** For more information about the proposed project, or to express concerns about the project, please contact the Applicant listed above or the Planner named below as soon as possible. If you believe that there are exceptional or extraordinary circumstances associated with the project, you may request that the Planning Commission review this application at a public hearing for Discretionary Review. Requests for a Discretionary Review hearing must be filed during the 30-day review period, prior to the close of business on the Expiration Date shown above, or the next business day if that date is on a week-end or a legal holiday. If no Requests for Discretionary Review are filed, this project will be approved by the Planning Department after the Expiration Date.

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.

PROJECT SCOPE		
☑ Demolition	☑ New Construction	☐ Alteration
☐ Change of Use	☐ Façade Alteration(s)	☐ Front Addition
☐ Rear Addition	☐ Side Addition	☑ Vertical Addition

PROJECT FEATURES	EXISTING	PROPOSED
Building Use	Retail	Retail and Residential
Front Setback	None	No Change
Side Setbacks	None	No Change
Building Depth	87 feet	90 feet
Rear Yard	None	25 feet
Building Height	21 feet	70 feet 7 inches
Number of Stories	1	7 with elevator penthouse
Number of Dwelling Units	0	24
Number of Parking Spaces	0	No Change

PROJECT DESCRIPTION

The proposal is to merge lots 030 and 031 and construct a six-story vertical and horizontal addition (approximately 24,000 square feet) above an existing one-story commercial building and parking lot. The resulting building will include 24 two-bedroom residential units, and will have a 735 square-foot roof deck with a stair and elevator penthouse. The project does not provide vehicle parking. A Variance from the dwelling unit exposure requirement of the Planning Code is required and will be noticed separately.

The issuance of the building permit by the Department of Building Inspection or the Planning Commission project approval at a discretionary review hearing would constitute as the Approval Action for the project for the purposes of CEQA, pursuant to Section 31.04(h) of the San Francisco Administrative Code

To view plans or related documents, visit sf-planning.org/notices and search the Project Address listed above. Once the property is located, click on the dot(s) to view details of the record number above, its related documents and/or plans.

For more information, please contact Planning Department staff:
Monica Giacomucci, 415-575-8714, Monica.Giacomucci@sfgov.org

GENERAL INFORMATION ABOUT PROCEDURES

Reduced copies of the proposed project plans have been included in this mailing for your information. If you have questions about the plans, please contact the project Applicant listed on the front of this notice. You may wish to discuss the plans with your neighbors or neighborhood association, as they may already be aware of the project. If you have general questions about the Planning Department's review process, contact the Planning Information Center (PIC) at 1660 Mission Street, 1st Floor (415) 558-6377 or pic@sfgov.org. If you have specific questions about the proposed project, you should contact the planner listed on the front of this notice.

If you believe that the impact on you from the proposed project is significant and you wish to seek to change the project, there are several procedures you may use. **We strongly urge that steps 1 and 2 be taken.**

1. Request a meeting with the project Applicant to get more information and to explain the project's impact on you.
2. Contact the nonprofit organization Community Boards at (415) 920-3820, or online at www.communityboards.org for a facilitated discussion in a safe and collaborative environment. Community Boards acts as a neutral third party and has, on many occasions, helped reach mutually agreeable solutions.
3. Where you have attempted, through the use of the above steps or other means, to address potential problems without success, please contact the planner listed on the front of this notice to discuss your concerns.

If, after exhausting the procedures outlined above, you still believe that exceptional and extraordinary circumstances exist, you have the option to request that the Planning Commission exercise its discretionary powers to review the project. These powers are reserved for use in exceptional and extraordinary circumstances for projects which generally conflict with the City's General Plan and the Priority Policies of the Planning Code; therefore the Commission exercises its discretion with utmost restraint. This procedure is called Discretionary Review. If you believe the project warrants Discretionary Review by the Planning Commission, **you must file a Discretionary Review application prior to the Expiration Date shown on the front of this notice.** Discretionary Review applications are available at the Planning Information Center (PIC), 1660 Mission Street, 1st Floor, or online at www.sfplanning.org). **You must submit the application in person** at the Planning Information Center (PIC), with all required materials and a check payable to the Planning Department. To determine the fee for a Discretionary Review, please refer to the Planning Department Fee Schedule available at www.sfplanning.org. If the project includes multiple building permits, i.e. demolition and new construction, a **separate request for Discretionary Review must be submitted, with all required materials and fee, for each permit that you feel will have an impact on you. Incomplete applications will not be accepted.**

If no Discretionary Review Applications have been filed within the Notification Period, the Planning Department will approve the application and forward it to the Department of Building Inspection for its review.

BOARD OF APPEALS

An appeal of the Planning Commission's decision on a Discretionary Review case may be made to the **Board of Appeals within 15 calendar days after the building permit is issued** (or denied) by the Department of Building Inspection. Appeals must be submitted in person at the Board's office at 1650 Mission Street, 3rd Floor, Room 304. For further information about appeals to the Board of Appeals, including current fees, contact the Board of Appeals at (415) 575-6880.

ENVIRONMENTAL REVIEW

This project has undergone preliminary review pursuant to California Environmental Quality Act (CEQA). If, as part of this process, the Department's Environmental Review Officer has deemed this project to be exempt from further environmental review, an exemption determination has been prepared and can be obtained through the Exemption Map at www.sfplanning.org. An appeal of the decision **to exempt the proposed project from CEQA may be made to the Board of Supervisors within 30 calendar days** after the project approval action identified on the determination. The procedures for filing an appeal of an exemption determination are available from the Clerk of the Board at City Hall, Room 244, or by calling (415) 554-5184.

Under CEQA, in a later court challenge, a litigant may be limited to raising only those issues previously raised at a hearing on the project or in written correspondence delivered to the Board of Supervisors, Planning Commission, Planning Department or other City board, commission or department at, or prior to, such hearing, or as part of the appeal hearing process on the CEQA decision.

SAN FRANCISCO
PLANNING DEPARTMENT

Certificate of Determination
Community Plan Evaluation

1650 Mission St.
Suite 400
San Francisco,
CA 94103-2479

Reception:
415.558.6378

Fax:
415.558.6409

Planning
Information:
415.558.6377

Record No.:	2017-009796ENV, 1088 HOWARD ST
Zoning:	MUG (MIXED USE-GENERAL) 85-X Height and Bulk District
Plan Area:	Eastern Neighborhoods Area Plan, East SoMa Subarea
Block/Lot:	3726/030 and 031
Lot Size:	4,506 square feet
Project Sponsor:	Jeremy Schaub, Schaub Ly Architects, Inc., 415-682-8060
Staff Contact:	Ryan Shum, Ryan.Shum@sfgov.org 415-575-9021

PROJECT DESCRIPTION

The project proposes to merge two adjacent lots (3726/030 and 031), demolish the existing single-story with mezzanine level industrial building on-site (the façade of the existing building will be preserved), and construct a seven-story, 71-foot tall mixed-use residential and commercial building with 24 two-bedroom units and 2,560 square feet of ground-floor commercial space.

With implementation of the proposed project, the 24,210 gross-square-foot building would contain approximately 15,605 gross square feet of residential space, 2,560 gross square feet of commercial space, 885 gross square feet of private open space, and 1,680 gross square feet of shared open space on the rooftop deck. In addition, the proposed project includes 24 class I bicycle parking spaces on the ground floor, and two class II bicycle parking spaces on the project's Howard Street frontage. No vehicular parking spaces are proposed. Other project features include rooftop solar panels and three new street trees along the project frontage. As part of the project, the existing curb cut in front of the project site on Howard Street would be removed, and the curb would be rebuilt to match the existing curb line. Construction of the proposed project would last approximately 18 months.

Approval Action: If discretionary review before the Planning Commission is requested, the discretionary review hearing is the Approval Action for the project. If no discretionary review is requested, the issuance of a building permit by the building department is the Approval Action. The approval action date establishes the start of the 30-day appeal period for this CEQA determination pursuant to Section 31.04(h) of the San Francisco Administrative Code.

The proposed project would require the following approvals:

Actions by other City Departments

- Building Permits for demolition and new construction -- Department of Building Inspection.
- Elimination of curb cut – San Francisco Public Works
- Approval of three new street trees – San Francisco Public Works
- Site Mitigation Plan per Article 22A of the Health Code (Maher Ordinance) -- Department of Public Health.
- Dust Control Plan per Article 22B of the Health Code – Department of Public Health.

The approval action date establishes the start of the 30-day appeal period for this CEQA determination pursuant to section 31.04(h) of the San Francisco Administrative Code.

COMMUNITY PLAN EVALUATION OVERVIEW

California Environmental Quality Act (CEQA) section 21083.3 and CEQA Guidelines section 15183 provide that projects that are consistent with the development density established by existing zoning, community plan or general plan policies for which an environmental impact report (EIR) was certified, shall not be subject to additional environmental review except as might be necessary to examine whether there are project-specific significant effects which are peculiar to the project or its site. Section 15183 specifies that examination of environmental effects shall be limited to those effects that: a) are peculiar to the project or parcel on which the project would be located; b) were not analyzed as significant effects in a prior EIR on the zoning action, general plan or community plan with which the project is consistent; c) are potentially significant off-site and cumulative impacts that were not discussed in the underlying EIR; or d) are previously identified in the EIR, but which, as a result of substantial new information that was not known at the time that the EIR was certified, are determined to have a more severe adverse impact than that discussed in the underlying EIR. Section 15183(c) specifies that if an impact is not peculiar to the parcel or to the proposed project, then an EIR need not be prepared for the project solely on the basis of that impact.

This determination evaluates the potential project-specific environmental effects of the 1088 HOWARD ST project described above and incorporates by reference information contained in the programmatic EIR for the Eastern Neighborhoods Rezoning and Area Plans (PEIR)[1]. Project-specific studies were prepared for the proposed project to determine if the project would result in any significant environmental impacts that were not identified in the Eastern Neighborhoods PEIR.

FINDINGS

As summarized in the initial study – community plan evaluation prepared for the proposed project (Attachment A)[2]:

1. The proposed project is consistent with the development density established for the project site in the Eastern Neighborhoods Rezoning and Area Plans[3];

2. The proposed project would not result in effects on the environment that are peculiar to the project or the project site that were not identified as significant effects in the Eastern Neighborhoods PEIR;

3. The proposed project would not result in potentially significant off-site or cumulative impacts that were not identified in the Eastern Neighborhoods PEIR;

[1] Planning Department Record No. 2004.0160E and State Clearinghouse No. 2005032048. Available at: https://sfplanning.org/environmental-review-documents?field_environmental_review_categ_target_id=214&items_per_page=10. Accessed August 16, 2019.

[2] The initial study – community plan evaluation is available for review at the San Francisco Property Information Map, which can be accessed at *https://sfplanninggis.org/PIM/*. The file can be viewed by clicking on the Planning Applications link, clicking the "More Details" link under the project's environmental record number 2017-009796ENV and then clicking on the "Related Documents" link.

[3] San Francisco Planning Department. Community Plan Evaluation Eligibility Determination for 1088 Howard Street (2017-009796ENV) – Current Planning. April 29, 2019.

4. The proposed project would not result in significant effects, which, as a result of substantial new information that was not known at the time the Eastern Neighborhoods PEIR was certified, would be more severe than were already analyzed and disclosed in the PEIR; and

5. The project sponsor will undertake feasible mitigation measures specified in the Eastern Neighborhoods PEIR to mitigate project-related significant impacts.

Mitigation measures are included in this project and the project sponsor has agreed to implement these measures.[4] See the attached Mitigation Monitoring and Reporting Program (MMRP) (Attachment B) for the full text of required mitigation measures.

CEQA DETERMINATION

The project is eligible for streamlined environmental review per section 15183 of the CEQA Guidelines and California Public Resources Code section 21083.3.

DETERMINATION

I do hereby certify that the above determination has been made pursuant to State and local requirements.

Lisa Gibson
Environmental Review Officer

12/18/19
Date

ATTACHMENTS

A. Initial Study – Community Plan Evaluation Checklist & Project Plans
B. Project Plans
C. Cumulative Development Projects
D. Mitigation Monitoring and Reporting Program

cc: Jeremy Schaub, Project Sponsor
Supervisor Matt Haney, District 6
Monica Giacomucci, Current Planning Division
Project distribution

[4] The Agreement to Implement Mitigation Measures for the proposed project is available for public review at the Planning Department, 1650 Mission Street, 4th Floor, San Francisco, CA 94103 as part of case file no. 2017-009796ENV. These documents are also available for review on the San Francisco Property Information Map, which can be accessed at https://sfplanninggis.org/PIM/. Individual files can be viewed by clicking on the Planning Applications link, clicking the "More Details" link under the project's environmental case number (2017-009796ENV) and then clicking on the "Related Documents" link.

ATTACHMENT D
1088 HOWARD STREET: MITIGATION MONITORING AND REPORTING PROGRAM

	MONITORING AND REPORTING PROGRAM			
Adopted Mitigation/Improvement Measures	**Implementation Responsibility**	**Mitigation Schedule**	**Monitoring and Reporting Actions and Responsibility**	**Monitoring Schedule**
MITIGATION MEASURES				
Project Mitigation Measure M-CR-1 – Archeological Resources (Archeological Testing), implementing Eastern Neighborhoods PEIR Mitigation Measure J-2). 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 and on human remains and associated or unassociated funerary objects. The project sponsor shall retain the services of an archaeological consultant from the rotational Department Qualified Archaeological Consultants List (QACL) maintained by the Planning Department archaeologist. After the first project approval action or as directed by the ERO, the project sponsor shall contact the Department archeologist to obtain the names and contact information for the next three archeological consultants on the QACL. 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	Project sponsor and archeological consultant at the direction of the ERO	In the event that an archeological site associated with a particular descendant group is uncovered during the construction period	Planning Department	Considered complete after Final Archeological Resources Report is approved and provided to descendant group

Adopted Mitigation/Improvement Measures	MONITORING AND REPORTING PROGRAM Implementation Responsibility	Mitigation Schedule	Monitoring and Reporting Actions and Responsibility	Monitoring Schedule
consultant as specified herein shall be submitted first and directly to the ERO for review and comment and shall be considered draft reports subject to revision until final approval by the ERO. Archeological monitoring and/or data recovery programs required by this measure could suspend construction of the project for up to a maximum of four weeks. At the direction of the ERO, the suspension of construction can be extended beyond four weeks only if such a suspension is the only feasible means to reduce to a less than significant level potential effects on a significant archeological resource as defined in CEQA Guidelines Sect. 15064.5 (a) and (c).				
Consultation with Descendant Communities: On discovery of an archeological site1 associated with descendant Native Americans, the Overseas Chinese, or other potentially interested descendant group an appropriate representative2 of the descendant group and the ERO shall be contacted. The representative of the descendant group shall be given the opportunity to monitor archeological field investigations of the site and to offer recommendations to the ERO regarding appropriate archeological treatment of the site, of recovered data from the site, and, if applicable, any interpretative treatment of the associated archeological site. A copy of the Final Archaeological Resources Report shall be provided to the representative of the descendant group.	Project sponsor and archeological consultant at the direction of the ERO	Prior to soil disturbance	Planning Department	Considered complete after Final Archeological Resources Report is approved and provided to descendant group

1 The term "archeological site" is intended here to minimally include any archeological deposit, feature, burial, or evidence of burial.

2 An "appropriate representative" of the descendant group is here defined to mean, in the case of Native Americans, any individual listed in the current Native American Contact List for the City and County of San Francisco maintained by the California Native American Heritage Commission and in the case of the Overseas Chinese, the Chinese Historical Society of America. An appropriate representative of other descendant groups should be determined in consultation with the Department archeologist.

	MONITORING AND REPORTING PROGRAM			
Adopted Mitigation/Improvement Measures	**Implementation Responsibility**	**Mitigation Schedule**	**Monitoring and Reporting Actions and Responsibility**	**Monitoring Schedule**
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 an 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, preservation in place, archeological monitoring, and/or an archeological data recovery program. No archeological data recovery shall be undertaken without the prior approval of the ERO or the Planning Department archeologist.	Project sponsor and archeological consultant at the direction of the ERO	During soil disturbing activities	Planning Department	Considered complete after approval of Archeological Testing Report

	MONITORING AND REPORTING PROGRAM			
Adopted Mitigation/Improvement Measures	**Implementation Responsibility**	**Mitigation Schedule**	**Monitoring and Reporting Actions and Responsibility**	**Monitoring Schedule**
If the ERO determines that a significant archeological resource is present and that the resource could be adversely affected by the proposed project, the ERO, in consultation with the project sponsor, shall determine whether preservation of the resource in place is feasible. If so, the proposed project shall be re-designed so as to avoid any adverse effect on the significant archeological resource. If preservation in place is not feasible, a data recovery program shall be implemented, unless the ERO determines that the archeological resource is of greater interpretive than research significance and that interpretive use of the resource is feasible.				
Archeological Monitoring Program. If the ERO in consultation with the archeological consultant determines that an archeological monitoring program shall be implemented the archeological monitoring program shall minimally include the following provisions: ▪ The archeological consultant, project sponsor, and ERO shall meet and consult on the scope of the AMP reasonably prior to any project-related soils disturbing activities commencing. The ERO in consultation with the archeological consultant shall determine what project activities shall be archeologically monitored. In most cases, any soils-disturbing activities, such as demolition, foundation removal, excavation, grading, utilities installation, foundation work, driving of piles (foundation, shoring, etc.), site remediation, etc., shall require archeological monitoring because of the risk these	Project sponsor and archeological consultant at the direction of the ERO	Following discovery of significant archeological resources	Planning Department	Considered complete after completion of the archeological monitoring program

Adopted Mitigation/Improvement Measures	MONITORING AND REPORTING PROGRAM			
	Implementation Responsibility	Mitigation Schedule	Monitoring and Reporting Actions and Responsibility	Monitoring Schedule
activities pose to potential archaeological resources and to their depositional context; ▪ The archeological consultant shall undertake a worker training program for soil-disturbing workers that will include an overview of expected resource(s), how to identify the evidence of the expected resource(s), and the appropriate protocol in the event of apparent discovery of an archeological resource; ▪ The archeological monitor(s) shall be present on the project site according to a schedule agreed upon by the archeological consultant and the ERO until the ERO has, in consultation with project archeological consultant, determined that project construction activities could have no effects on significant archeological deposits; ▪ The archeological monitor shall record and be authorized to collect soil samples and artifactual/ecofactual material as warranted for analysis; ▪ If an intact archeological deposit is encountered, all soils-disturbing activities in the vicinity of the deposit shall cease. The archeological monitor shall be empowered to temporarily redirect demolition/excavation/pile driving/construction activities and equipment until the deposit is evaluated. If in the case of pile driving or deep foundation activities (foundation, shoring, soil improvement, etc.), the archeological monitor has cause to believe that the pile driving or deep foundation activities may affect an archeological				

	MONITORING AND REPORTING PROGRAM			
Adopted Mitigation/Improvement Measures	**Implementation Responsibility**	**Mitigation Schedule**	**Monitoring and Reporting Actions and Responsibility**	**Monitoring Schedule**
resource, the pile driving or deep foundation activities shall be terminated until an appropriate evaluation of the resource has been made in consultation with the ERO. The archeological consultant shall immediately notify the ERO of the encountered archeological deposit. The archeological consultant shall make a reasonable effort to assess the identity, integrity, and significance of the encountered archeological deposit, and present the findings of this assessment to the ERO.				
Whether or not significant archeological resources are encountered, the archeological consultant shall submit a written report of the findings of the monitoring program to the ERO.				
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	Project sponsor and archeological consultant at the direction of the ERO	Following discovery of significant archeological resources	Planning Department	Considered complete after FARR is reviewed and approved

Adopted Mitigation/Improvement Measures	MONITORING AND REPORTING PROGRAM			
	Implementation Responsibility	Mitigation Schedule	Monitoring and Reporting Actions and Responsibility	Monitoring Schedule

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 on-site/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

Adopted Mitigation/Improvement Measures	MONITORING AND REPORTING PROGRAM Implementation Responsibility	Mitigation Schedule	Monitoring and Reporting Actions and Responsibility	Monitoring Schedule
of appropriate curation facilities, and a summary of the accession policies of the curation facilities.				
Human Remains, 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	Project sponsor and archeological consultant at the direction of the ERO	Following the discovery of human remains	Planning Department	Considered complete on finding by the ERO that all state laws regarding human remains/burial objects have been adhered to, consultation with MLD is completed as warranted, sufficient opportunity has been provided to the archeological consultant for scientific/historical analysis of human remains/funerary objects, and after FARR is

	MONITORING AND REPORTING PROGRAM			
Adopted Mitigation/Improvement Measures	**Implementation Responsibility**	**Mitigation Schedule**	**Monitoring and Reporting Actions and Responsibility**	**Monitoring Schedule**
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 and/or mortuary materials are stored securely and respectfully until they can be reinterred on the property, with appropriate dignity, in a location not subject to further or future subsurface disturbance. 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.				reviewed and approved
Final Archeological Resources Report. The archeological consultant shall submit a Draft Final Archeological Resources Report (FARR) to the ERO that evaluates the	Archeological consultant at the	Following completion of additional	Planning Department	Considered complete upon

Adopted Mitigation/Improvement Measures	MONITORING AND REPORTING PROGRAM			
	Implementation Responsibility	Mitigation Schedule	Monitoring and Reporting Actions and Responsibility	Monitoring Schedule
historical significance of any discovered archeological resource and describes the archeological and historical research methods employed in the archeological testing/monitoring/data recovery program(s) undertaken. The Draft FARR shall include a curation and deaccession plan for all recovered cultural materials. The Draft FARR shall also include an Interpretation Plan for public interpretation of all significant archeological features. Copies of the Draft FARR shall be sent to the ERO for review and approval. Once approved by the ERO, the consultant shall also prepare a public distribution version of the FARR. Copies of the FARR shall be distributed as follows: California 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 Environmental Planning division of the Planning Department shall receive one bound and one unlocked, searchable PDF copy on CD of the FARR along with copies of any formal site recordation forms (CA DPR 523 series) and/or documentation for nomination to the National Register of Historic Places/California Register of Historical Resources. In instances of public interest in or the high interpretive value of the resource, the ERO may require a different or additional final report content, format, and distribution than that presented above.	direction of the ERO	measures by archeological consultant as determined by the ERO		distribution of approved FARR

	MONITORING AND REPORTING PROGRAM			
Adopted Mitigation/Improvement Measures	**Implementation Responsibility**	**Mitigation Schedule**	**Monitoring and Reporting Actions and Responsibility**	**Monitoring Schedule**
Consultation with Descendant Communities: On discovery of an archeological site[3] associated with descendant Native Americans, the Overseas Chinese, or other potentially interested descendant group an appropriate representative[4] of the descendant group and the ERO shall be contacted. The representative of the descendant group shall be given the opportunity to monitor archeological field investigations of the site and to offer recommendations to the ERO regarding appropriate archeological treatment of the site, of recovered data from the site, and, if applicable, any interpretative treatment of the associated archeological site. A copy of the Final Archaeological Resources Report shall be provided to the representative of the descendant group.	Archeological consultant at the direction of the ERO	Following discovery of significant archeological resources	Planning Department	Considered complete upon distribution of approved FARR
Project Mitigation Measure M-TCR-1 — Tribal Cultural Resources Preservation or Interpretation If, pursuant to the provisions of Project Mitigation Measure M-CR-1, above, the Environmental Review Officer (ERO), in consultation with the project sponsor, determines that preservation-in-place of the tribal cultural resource (TCR) would be both feasible and effective, then the archeological consultant shall prepare an archeological resource preservation plan (ARPP). Implementation of the approved ARPP by the archeological consultant shall be required when	Project sponsor archeological consultant, and ERO, in consultation with the affiliated Native American tribal representatives	If significant tribal cultural resources are present, during implementation of the project	Planning Department	Considered complete upon project redesign, implementation of ARPP, or TCR interpretive program, as applicable

[3] The term "archeological site" is intended here to minimally include any archeological deposit, feature, burial, or evidence of burial.

[4] An "appropriate representative" of the descendant group is here defined to mean, in the case of Native Americans, any individual listed in the current Native American Contact List for the City and County of San Francisco maintained by the California Native American Heritage Commission and in the case of the Overseas Chinese, the Chinese Historical Society of America. An appropriate representative of other descendant groups should be determined in consultation with the Department archeologist.

	MONITORING AND REPORTING PROGRAM			
Adopted Mitigation/Improvement Measures	**Implementation Responsibility**	**Mitigation Schedule**	**Monitoring and Reporting Actions and Responsibility**	**Monitoring Schedule**
feasible. If the ERO in consultation with the project sponsor determines that preservation–in-place of the TCR is not a sufficient or feasible option, then the project sponsor shall implement an interpretive program of the TCR in consultation with affiliated Native American tribal representatives. An interpretive plan produced in consultation with affiliated Native American tribal representatives, at a minimum, and approved by the ERO would be required to guide the interpretive program. The plan shall identify proposed locations for installations or displays, the proposed content and materials of those displays or installation, the producers or artists of the displays or installation, and a long-term maintenance program. The interpretive program may include artist installations, preferably by local Native American artists, oral histories with local Native Americans, artifacts displays and interpretation, and educational panels or other informational displays.				
Project Mitigation Measure M-NOI-1 — Construction Noise (Eastern Neighborhoods PEIR Mitigation Measure F-2) The project sponsor shall develop a set of site-specific noise attenuation measures under the supervision of a qualified acoustical consultant. Prior to commencing construction, a plan for such measures shall be submitted to the Department of Building Inspection to ensure that maximum feasible noise attenuation will be achieved.	Project sponsor and construction contractor(s)	Prior to and during construction activities	The project sponsor or construction contractor shall make available a contact number for noise complaints during the construction period and shall file a report with the Planning Department at the conclusion of	Considered complete upon receipt of final monitoring report at completion of construction.

	MONITORING AND REPORTING PROGRAM			
Adopted Mitigation/Improvement Measures	**Implementation Responsibility**	**Mitigation Schedule**	**Monitoring and Reporting Actions and Responsibility**	**Monitoring Schedule**
These attenuation measures shall include as many of the following control strategies as feasible: • Erect temporary plywood noise barriers around a construction site, particularly where a site adjoins noise-sensitive uses; • Utilize noise control blankets on a building structure as the building is erected to reduce noise emission from the site; • Evaluate the feasibility of noise control at the receivers by temporarily improving the noise reduction capability of adjacent buildings housing sensitive uses; • Monitor the effectiveness of noise attenuation measures by taking noise measurements; and • Post signs on-site pertaining to permitted construction days and hours and complaint procedures and who to notify in the event of a problem, with telephone numbers listed.			construction as to the number and nature of such complaints received and the means of resolving each such complaint	
Project Mitigation Measure M-AQ-1 — Construction Air Quality (Eastern Neighborhoods PEIR Mitigation Measure G-1) 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	Project sponsor and construction contractor(s).	During construction activities	Project sponsor to submit certification statement to the ERO	Considered complete on submittal of certification statement and final summary report.

Adopted Mitigation/Improvement Measures	MONITORING AND REPORTING PROGRAM			
	Implementation Responsibility	Mitigation Schedule	Monitoring and Reporting Actions and Responsibility	Monitoring Schedule
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				

Adopted Mitigation/Improvement Measures	MONITORING AND REPORTING PROGRAM			
	Implementation Responsibility	Mitigation Schedule	Monitoring and Reporting Actions and Responsibility	Monitoring Schedule
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 Table below.				

Adopted Mitigation/Improvement Measures	MONITORING AND REPORTING PROGRAM			
	Implementation Responsibility	Mitigation Schedule	Monitoring and Reporting Actions and Responsibility	Monitoring Schedule

Table – 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 on-site construction activities, the Contractor shall submit a Construction Emissions Minimization Plan (Plan) to the ERO for review and approval. The Plan shall state, in

Adopted Mitigation/Improvement Measures	MONITORING AND REPORTING PROGRAM			
	Implementation Responsibility	Mitigation Schedule	Monitoring and Reporting Actions and Responsibility	Monitoring Schedule
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				

Adopted Mitigation/Improvement Measures	MONITORING AND REPORTING PROGRAM			
	Implementation Responsibility	Mitigation Schedule	Monitoring and Reporting Actions and Responsibility	Monitoring Schedule
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 on-site 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.				

San Francisco Planning

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DATE: March 25, 2020

TO: 195 7th Street Building Homeowners Association

FROM: Ryan Shum, Senior Environmental Planner
Debra Dwyer, Principal Environmental Planner

RE: **Clarifications for Environmental Review,**
1088 Howard Street Project (2017-009796ENV)

Purpose

The purpose of this memo is to address some of the questions and concerns that were brought forth at the March 4, 2020 meeting with Supervisor Haney's office regarding the proposed 1088 Howard Street project. The information below is primarily excerpted from the Initial Study – Community Plan Evaluation (CPE) that was published on December 18, 2019. The environmental documents are available on the Planning Department's website under the Community Plan and Infill Evaluations section of environmental review documents, linked here. Where applicable and helpful, page numbers of the Initial Study checklist document have been added as a reference. Some of the issues that were raised during the March 4 meeting are outside of the scope of the California Environmental Quality Act (CEQA), and therefore are not included in the discussion below. If desired, we are available for a follow-up call to provide additional clarification.

Technical Topics

CEQA is a state regulation that requires local government to inform decision makers and the public about potential environmental effects of a project, and to reduce those environmental impacts to the extent feasible.[1]

The sections presented below are focused on topics pertaining to concerns that were brought forth by the 195 7th Street Building Homeowners Association (HOA) as they relate to CEQA, and as the Planning Department currently understands them.

Hazardous Materials

This section follows on the conference call held March 24, 2020 with Environmental Planning, the Department of Public Health (health department), and members of the HOA. This memo clarifies the concerns in the context of CEQA review for the proposed project with the clarification that some concerns are better addressed by health department staff. Hazardous materials-related questions that were raised pertain to when and how site-specific soil testing is conducted, how nearby residents are protected during construction and operation of a project, and how a site is ultimately deemed safe.

In San Francisco, the health department maintains primary oversight authority for the characterization and mitigation of hazardous substances in soils and groundwater through implementation of the Maher Ordinance

[1] The laws and rules governing CEQA are contained in the CEQA Statute (Public Resources Code Section 21000 and following), the CEQA Guidelines (California Code of Regulations, Title 14, Section 15000 and following), published court decisions interpreting CEQA, and locally adopted CEQA procedures. In San Francisco, Chapter 31 of the city's Administrative Code further defines local requirements for environmental review.

(San Francisco Health Code Article 22A). As noted on page 58 of the Initial Study, the project site is located in a Maher designated area and is therefore subject to the requirements of the Maher Ordinance. Soils testing and remediation would be completed by qualified contractors prior to the commencement of construction activities with oversight by the public health department. The responsible parties are required to submit a written workplan by a licensed professional (Professional Engineer or Professional Geologist) for public health's approval. Under a drilling permit, the qualified contractors would then collect soil, groundwater, and vapor samples. On the March 24, 2020 conference call, it was clarified that the work plan has been contingently approved pending soils testing and characterization on portions of the site now covered by the existing building. Once demolition of the existing structure occurs, the additional testing would be conducted. The results would be incorporated into the work plan.

Based on the analytical results, a Site Characterization Report is subsequently prepared and a Site Mitigation Plan would be required to address any elevated levels of contamination in order to protect the public. Both the Site Characterization Report and Site Mitigation Plan are subject to an approval process that is overseen by the Environmental Health Branch of the health department. Any contamination found on-site is required to be redressed to safe levels prior to the issuance of the building permit for new construction. During construction activities, a Dust Control Plan per Article 22B is also required to be implemented.

Since the city has local laws that project sponsors are required to follow to protect public health, the Planning Department's role is to ensure that projects enroll in the Maher Program to comply with requirements of the ordinance. Thus, although the in-depth soil testing and remediation activities may not occur during the environmental review stage, testing and remediation is required before building permits are issued and prior to construction activities. This part of the process is directly overseen by the health department. For additional information about the Maher Ordinance and compliance program, please refer to the public health department's website at: https://www.sfdph.org/dph/EH/HazWaste/Maher_FAQ.asp/. It is also noted that when project sponsors are referred to the Maher program for enrollment, the applicant completes a Maher ordinance application and is required to submit a site history for review by the public health department as they determine the appropriate work plan for testing. The health department does not rely on information in the planning department environmental review application with respect to site history in determining the appropriate steps for assessing and remediating hazardous materials at the site.

At the end of the March 24, 2020 conference call, HOA members were provided public health staff contact information in order to follow up directly if additional concerns or questions arise.

Utilities

Concerns were raised regarding existing intermittent basement flooding and drainage issues during severe wet weather events at the 195 7th Street building, and the potential for the proposed 1088 Howard Street project to exacerbate these issues. Specifically, as the Department understands it, the 195 7th Street Building Homeowners Association contends that existing drainage issues at 195 7th Street are related to the city's combined sewer system, which handles both sewage and stormwater runoff. As a result, the 195 7th Street Homeowners Association is concerned that developing the 1088 Howard Street project site would detrimentally affect the combined sewer system by further increasing the local amount of stormwater and wastewater entering the system.

The overall performance of the city's combined sewer system is affected by stormwater runoff and wastewater volume on a city-wide scale. Accordingly, measures to improve the performance of the combined sewer system

are completed on a greater, city-wide scale. The SFPUC is currently in the process of implementing the Sewer System Improvement Program, which is a 20-year, multi-billion-dollar citywide upgrade to the city's sewer and stormwater infrastructure to ensure a reliable and seismically safe system. The program includes planned improvements that will serve development in the plan area, including at the Southeast Treatment Plant, which is located in the Bayview District and treats the majority of flows in the Eastern Neighborhoods plan area, and the North Point Plant, which is located on the northeast waterfront and provides additional wet-weather treatment capacity. More information about the sewer improvement program can be found on the San Francisco Public Utilities Commission Website at: https://sfwater.org/index.aspx?page=116.

Furthermore, every development project in San Francisco is evaluated for compliance with the city's Stormwater Management Plan and proper utility connections prior to project approval. As noted on page 42 of the Initial Study checklist, the project site is currently developed with a building on one half of the site and a paved parking lot on the other half; in other words, the site currently consists entirely of impervious surfaces. As a result, the proposed project would not substantially increase the amount of stormwater entering the combined sewer system because the project would not increase impervious surfaces at the project site. In addition, the project is subject to the city's Stormwater Management Ordinance and the Stormwater Management Requirements and Design Guidelines. Compliance with this law and regulations would ensure that the design of the proposed project includes installation of appropriate stormwater management systems that retain runoff on site, promote stormwater reuse, and limit discharges from the site from entering the city's combined stormwater/sewer system.

In particular, under the Stormwater Management Ordinance, the proposed project is required to meet a performance standard that reduces the existing runoff flow rate and volume at the project site by 25 percent for a two-year 24-hour design storm. Therefore, once constructed the project would not contribute additional volume of polluted runoff to the city's stormwater infrastructure. In addition, although the proposed project would add new residents and employees to the project site, the combined sewer system has capacity to serve projected growth through year 2045. Therefore, the incremental increase in wastewater treatment resulting from the project would be met by the existing sewer system and would not require expansion of existing wastewater facilities or construction of new facilities.

Ultimately, the city's combined sewer system is overseen and managed by the San Francisco Public Utilities Commission (SFPUC) in accordance with the 2030 Sewer System Master Plan (Technical Memorandum No. 511).[2] The plan lays out a programmatic approach to reduce flooding to the extent practicable by identifying and targeting problem areas, prioritizing flood relief projects, optimizing existing facilities and conditions, and supplementing and modifying existing facilities where needed. The proposed project site and 195 7th Street building are located within the Channel Drainage Basin. Recommendations for the Channel Drainage area include the construction of a series of five storage and pump station facilities.[3] The project area is being continuously studied by the SFPUC. Additional plan details and contact information is available on the SFPUC's website at: https://sfwater.org/index.aspx.

[2] San Francisco Public Utilities Commission. *2030 Sewer System Master Plan*. December 2010. Available at: <sfwater.org/modules/showdocument.aspx?documentid=587>
[3] *Ibid.* Page 511-5.

Congestion and Safety

Concerns that were raised pertained to the proposed project's impact to congestion in the surrounding area, and impacts to bicyclists and pedestrian safety. The proposed project does not include any vehicle parking spaces and would remove an existing surface parking lot on-site. As discussed on page 24 of the Initial Study, the existing curb cut on the site's Howard Street frontage would also be removed and filled to match the existing curb line. New vehicle trips associated with the project would not conflict with people walking on the sidewalks since the proposed project would remove the existing driveway and fill in the curb cut. The design of the project would not exacerbate any potentially hazardous conditions for bicyclists on Howard Street. Drivers would have adequate visibility of bicyclists on the class II bikeway as they enter the right-turn pocket on Howard Street. In addition, the proposed project would not generate a substantial number of vehicle trips in the surrounding area.

In addition, as noted on page 8 and 25, the San Francisco Municipal Transportation Agency is working to further improve safety on Howard Street between 3rd Street and 11th Street and Folsom Street between 2nd Street and 11th Street through the Folsom-Howard Streetscape Project. The project would include bicycle, pedestrian, and transit facility improvements, upgrades to traffic signals, traffic circulation modifications, and changes to parking and loading.[4] Implementation of the Folsom-Howard Streetscape Project would further improve pedestrian and bicycle safety in the surrounding area.

Construction Impacts (Air Quality and Noise)

Concerns were raised regarding construction air quality and noise impacts on nearby residents. The Initial Study checklist describes the project's construction air quality and noise impacts in sections E.7 and E.6, respectively. Portions of the Initial Study checklist related to construction air quality and noise impacts are summarized below.

Air Quality

The project's construction air quality impacts are discussed on pages 31 through 33 of the Initial Study. As noted on page 33, the project sponsor has agreed to implement a construction air quality mitigation measure that would require construction contractors to use construction equipment that results in lower emissions. This measure would reduce diesel particulate matter exhaust from construction equipment by 89 to 94 percent compared to uncontrolled construction equipment. Additional information is available in the attached Mitigation Monitoring and Reporting Program.

As noted on page 31, project construction activities would also be required to adhere to the city's Construction Dust Control Ordinance (health code article 22B). The intent of the dust control ordinance is to reduce the quantity of fugitive dust generated during site preparation, demolition, and construction work to protect the health of the general public and of construction workers, minimize public nuisance complaints, and to avoid orders to stop work in response to dust complaints. In compliance with the dust control ordinance, the project sponsor and contractor responsible for construction activities at the project site would be required to control construction dust on the site through a combination of watering disturbed areas, covering stockpiled materials, street and sidewalk sweeping, and other measures.

The regulations and procedures set forth by the San Francisco Dust Control Ordinance are overseen by the health department and would ensure that construction dust impacts would not be significant.

[4] San Francisco Municipal Transportation Agency. *Folsom-Howard Streetscape Project.* Accessed March 12, 2020. Available at: < https://www.sfmta.com/projects/folsom-howard-streetscape-project>

Noise

The project's construction noise impacts are discussed on page 28 of the Initial Study checklist. As noted there, the project sponsor has agreed to implement mitigation measures to reduce construction noise impacts. In accordance with the approved Mitigation Monitoring and Reporting Program, the project sponsor shall develop a set of site-specific noise attenuation measures under the supervision of a qualified acoustical consultant. Prior to commencing construction, a plan for such measures shall be submitted to the Planning Department and health department to ensure that maximum feasible noise attenuation will be achieved. These attenuation measures shall include as many of the following control strategies, as feasible, and may include other measures as deemed appropriate by the acoustical consultant:

- Erect temporary plywood noise barriers around a construction site, particularly where a site adjoins noise-sensitive uses;
- Utilize noise control blankets on a building structure as the building is erected to reduce noise emission from the site;
- Evaluate the feasibility of noise control at the receivers by temporarily improving the noise reduction capability of adjacent buildings housing sensitive uses;
- Monitor the effectiveness of noise attenuation measures by taking noise measurements; and
- Post signs on-site pertaining to permitted construction days and hours and complaint procedures and who to notify in the event of a problem, with telephone numbers listed.

Furthermore, all construction activities are subject to the San Francisco Noise Ordinance (Article 29 of the San Francisco Police Code), which limits the amount of construction noise at the project site and is enforced by the Department of Building Inspection during normal business hours (8:00 a.m. to 5:00 p.m.) and by the police department during all other hours. Although construction activities could be disruptive and an annoyance for nearby residents, construction noise levels would not be a permanent condition and with the mitigation measure above is considered a less than significant environmental impact under CEQA.

Geology (Structural Safety)

The Planning Department understands that neighbors are concerned that construction of the proposed project could compromise the structural integrity of existing adjacent buildings.

As noted on page 51 of the Initial Study, a geotechnical evaluation was prepared for the proposed project by a state-certified professional engineer.[5] Field borings were drilled on the project site and underlying soil was characterized. Based on field investigations, the geotechnical evaluation made recommendations to ensure that the proposed structure would be geotechnically and structurally sound. The proposed project would adhere to the recommendations of the geotechnical investigation. Soils at the site would be improved prior to construction and would use a mat slab foundation to support the proposed structure. Soil improvements to reduce the potential for differential settlement include remedial grading (removal of undocumented fill and replacement with compacted fill), or compaction grouting, or drilled displacement grouting. The geotechnical evaluation further states that deep dynamic compaction or rapid impact compaction may be considered an alternative method for mitigating the undocumented fill where the compaction grouting cannot be extended to the bottom of the footing or engineered fill pad.[6] The geotechnical report is available for review through the San Francisco

[5] Carland, Inc. Preliminary Geotechnical Evaluation: 1088 Howard Street. July 28, 2017.
[6] *Ibid.* Page 11.

Property Information Map under Related documents for the environmental planning application, 2017-009796ENV.

To ensure that the potential for adverse effects related to geology and soils are adequately addressed, San Francisco relies on the state and local regulatory process for review and approval of building permits. The project is required to comply with the state and local building code including the building department's administrative bulletins, which ensures the safety of all new construction in the city. The building department will review the project construction plans for conformance with the recommendations in the project-specific geotechnical report during its review of the building permit for the project.

In addition, the building department may require additional site-specific report(s) through the building permit application process and its implementing procedures, as needed. The building department's requirement for a geotechnical report and review of the building permit application pursuant to its implementation of the building code would ensure that the proposed project would have not result in any significant impacts related to soils, seismicity or other geological hazards.

Attachment

- Mitigation Monitoring and Reporting Program

ATTACHMENT D
1088 HOWARD STREET: MITIGATION MONITORING AND REPORTING PROGRAM

	MONITORING AND REPORTING PROGRAM			
Adopted Mitigation/Improvement Measures	**Implementation Responsibility**	**Mitigation Schedule**	**Monitoring and Reporting Actions and Responsibility**	**Monitoring Schedule**
MITIGATION MEASURES				
Project Mitigation Measure M-CR-1 – Archeological Resources (Archeological Testing), implementing Eastern Neighborhoods PEIR Mitigation Measure J-2). 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 and on human remains and associated or unassociated funerary objects. The project sponsor shall retain the services of an archaeological consultant from the rotational Department Qualified Archaeological Consultants List (QACL) maintained by the Planning Department archaeologist. After the first project approval action or as directed by the ERO, the project sponsor shall contact the Department archeologist to obtain the names and contact information for the next three archeological consultants on the QACL. 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	Project sponsor and archeological consultant at the direction of the ERO	In the event that an archeological site associated with a particular descendant group is uncovered during the construction period	Planning Department	Considered complete after Final Archeological Resources Report is approved and provided to descendant group

Adopted Mitigation/Improvement Measures	MONITORING AND REPORTING PROGRAM Implementation Responsibility	Mitigation Schedule	Monitoring and Reporting Actions and Responsibility	Monitoring Schedule
consultant as specified herein shall be submitted first and directly to the ERO for review and comment and shall be considered draft reports subject to revision until final approval by the ERO. Archeological monitoring and/or data recovery programs required by this measure could suspend construction of the project for up to a maximum of four weeks. At the direction of the ERO, the suspension of construction can be extended beyond four weeks only if such a suspension is the only feasible means to reduce to a less than significant level potential effects on a significant archeological resource as defined in CEQA Guidelines Sect. 15064.5 (a) and (c).				
Consultation with Descendant Communities: On discovery of an archeological site1 associated with descendant Native Americans, the Overseas Chinese, or other potentially interested descendant group an appropriate representative2 of the descendant group and the ERO shall be contacted. The representative of the descendant group shall be given the opportunity to monitor archeological field investigations of the site and to offer recommendations to the ERO regarding appropriate archeological treatment of the site, of recovered data from the site, and, if applicable, any interpretative treatment of the associated archeological site. A copy of the Final Archaeological Resources Report shall be provided to the representative of the descendant group.	Project sponsor and archeological consultant at the direction of the ERO	Prior to soil disturbance	Planning Department	Considered complete after Final Archeological Resources Report is approved and provided to descendant group

1 The term "archeological site" is intended here to minimally include any archeological deposit, feature, burial, or evidence of burial.

2 An "appropriate representative" of the descendant group is here defined to mean, in the case of Native Americans, any individual listed in the current Native American Contact List for the City and County of San Francisco maintained by the California Native American Heritage Commission and in the case of the Overseas Chinese, the Chinese Historical Society of America. An appropriate representative of other descendant groups should be determined in consultation with the Department archeologist.

	MONITORING AND REPORTING PROGRAM			
Adopted Mitigation/Improvement Measures	**Implementation Responsibility**	**Mitigation Schedule**	**Monitoring and Reporting Actions and Responsibility**	**Monitoring Schedule**
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 an 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, preservation in place, archeological monitoring, and/or an archeological data recovery program. No archeological data recovery shall be undertaken without the prior approval of the ERO or the Planning Department archeologist.	Project sponsor and archeological consultant at the direction of the ERO	During soil disturbing activities	Planning Department	Considered complete after approval of Archeological Testing Report

	MONITORING AND REPORTING PROGRAM			
Adopted Mitigation/Improvement Measures	**Implementation Responsibility**	**Mitigation Schedule**	**Monitoring and Reporting Actions and Responsibility**	**Monitoring Schedule**
If the ERO determines that a significant archeological resource is present and that the resource could be adversely affected by the proposed project, the ERO, in consultation with the project sponsor, shall determine whether preservation of the resource in place is feasible. If so, the proposed project shall be re-designed so as to avoid any adverse effect on the significant archeological resource. If preservation in place is not feasible, a data recovery program shall be implemented, unless the ERO determines that the archeological resource is of greater interpretive than research significance and that interpretive use of the resource is feasible.				
Archeological Monitoring Program. If the ERO in consultation with the archeological consultant determines that an archeological monitoring program shall be implemented the archeological monitoring program shall minimally include the following provisions: ▪ The archeological consultant, project sponsor, and ERO shall meet and consult on the scope of the AMP reasonably prior to any project-related soils disturbing activities commencing. The ERO in consultation with the archeological consultant shall determine what project activities shall be archeologically monitored. In most cases, any soils-disturbing activities, such as demolition, foundation removal, excavation, grading, utilities installation, foundation work, driving of piles (foundation, shoring, etc.), site remediation, etc., shall require archeological monitoring because of the risk these	Project sponsor and archeological consultant at the direction of the ERO	Following discovery of significant archeological resources	Planning Department	Considered complete after completion of the archeological monitoring program

Adopted Mitigation/Improvement Measures	MONITORING AND REPORTING PROGRAM			
	Implementation Responsibility	Mitigation Schedule	Monitoring and Reporting Actions and Responsibility	Monitoring Schedule
activities pose to potential archaeological resources and to their depositional context; ▪ The archeological consultant shall undertake a worker training program for soil-disturbing workers that will include an overview of expected resource(s), how to identify the evidence of the expected resource(s), and the appropriate protocol in the event of apparent discovery of an archeological resource; ▪ The archeological monitor(s) shall be present on the project site according to a schedule agreed upon by the archeological consultant and the ERO until the ERO has, in consultation with project archeological consultant, determined that project construction activities could have no effects on significant archeological deposits; ▪ The archeological monitor shall record and be authorized to collect soil samples and artifactual/ecofactual material as warranted for analysis; ▪ If an intact archeological deposit is encountered, all soils-disturbing activities in the vicinity of the deposit shall cease. The archeological monitor shall be empowered to temporarily redirect demolition/excavation/pile driving/construction activities and equipment until the deposit is evaluated. If in the case of pile driving or deep foundation activities (foundation, shoring, soil improvement, etc.), the archeological monitor has cause to believe that the pile driving or deep foundation activities may affect an archeological				

	MONITORING AND REPORTING PROGRAM			
Adopted Mitigation/Improvement Measures	**Implementation Responsibility**	**Mitigation Schedule**	**Monitoring and Reporting Actions and Responsibility**	**Monitoring Schedule**
resource, the pile driving or deep foundation activities shall be terminated until an appropriate evaluation of the resource has been made in consultation with the ERO. The archeological consultant shall immediately notify the ERO of the encountered archeological deposit. The archeological consultant shall make a reasonable effort to assess the identity, integrity, and significance of the encountered archeological deposit, and present the findings of this assessment to the ERO.				
Whether or not significant archeological resources are encountered, the archeological consultant shall submit a written report of the findings of the monitoring program to the ERO.				
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	Project sponsor and archeological consultant at the direction of the ERO	Following discovery of significant archeological resources	Planning Department	Considered complete after FARR is reviewed and approved

Adopted Mitigation/Improvement Measures	MONITORING AND REPORTING PROGRAM			
	Implementation Responsibility	Mitigation Schedule	Monitoring and Reporting Actions and Responsibility	Monitoring Schedule

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 on-site/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

Adopted Mitigation/Improvement Measures	MONITORING AND REPORTING PROGRAM Implementation Responsibility	Mitigation Schedule	Monitoring and Reporting Actions and Responsibility	Monitoring Schedule
of appropriate curation facilities, and a summary of the accession policies of the curation facilities.				
Human Remains, 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	Project sponsor and archeological consultant at the direction of the ERO	Following the discovery of human remains	Planning Department	Considered complete on finding by the ERO that all state laws regarding human remains/burial objects have been adhered to, consultation with MLD is completed as warranted, sufficient opportunity has been provided to the archeological consultant for scientific/historical analysis of human remains/funerary objects, and after FARR is

	MONITORING AND REPORTING PROGRAM			
Adopted Mitigation/Improvement Measures	**Implementation Responsibility**	**Mitigation Schedule**	**Monitoring and Reporting Actions and Responsibility**	**Monitoring Schedule**
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 and/or mortuary materials are stored securely and respectfully until they can be reinterred on the property, with appropriate dignity, in a location not subject to further or future subsurface disturbance. 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.				reviewed and approved
Final Archeological Resources Report. The archeological consultant shall submit a Draft Final Archeological Resources Report (FARR) to the ERO that evaluates the	Archeological consultant at the	Following completion of additional	Planning Department	Considered complete upon

Adopted Mitigation/Improvement Measures	MONITORING AND REPORTING PROGRAM			
	Implementation Responsibility	Mitigation Schedule	Monitoring and Reporting Actions and Responsibility	Monitoring Schedule
historical significance of any discovered archeological resource and describes the archeological and historical research methods employed in the archeological testing/monitoring/data recovery program(s) undertaken. The Draft FARR shall include a curation and deaccession plan for all recovered cultural materials. The Draft FARR shall also include an Interpretation Plan for public interpretation of all significant archeological features. Copies of the Draft FARR shall be sent to the ERO for review and approval. Once approved by the ERO, the consultant shall also prepare a public distribution version of the FARR. Copies of the FARR shall be distributed as follows: California 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 Environmental Planning division of the Planning Department shall receive one bound and one unlocked, searchable PDF copy on CD of the FARR along with copies of any formal site recordation forms (CA DPR 523 series) and/or documentation for nomination to the National Register of Historic Places/California Register of Historical Resources. In instances of public interest in or the high interpretive value of the resource, the ERO may require a different or additional final report content, format, and distribution than that presented above.	direction of the ERO	measures by archeological consultant as determined by the ERO		distribution of approved FARR

	MONITORING AND REPORTING PROGRAM			
Adopted Mitigation/Improvement Measures	**Implementation Responsibility**	**Mitigation Schedule**	**Monitoring and Reporting Actions and Responsibility**	**Monitoring Schedule**
Consultation with Descendant Communities: On discovery of an archeological site[3] associated with descendant Native Americans, the Overseas Chinese, or other potentially interested descendant group an appropriate representative[4] of the descendant group and the ERO shall be contacted. The representative of the descendant group shall be given the opportunity to monitor archeological field investigations of the site and to offer recommendations to the ERO regarding appropriate archeological treatment of the site, of recovered data from the site, and, if applicable, any interpretative treatment of the associated archeological site. A copy of the Final Archaeological Resources Report shall be provided to the representative of the descendant group.	Archeological consultant at the direction of the ERO	Following discovery of significant archeological resources	Planning Department	Considered complete upon distribution of approved FARR
Project Mitigation Measure M-TCR-1 — Tribal Cultural Resources Preservation or Interpretation If, pursuant to the provisions of Project Mitigation Measure M-CR-1, above, the Environmental Review Officer (ERO), in consultation with the project sponsor, determines that preservation-in-place of the tribal cultural resource (TCR) would be both feasible and effective, then the archeological consultant shall prepare an archeological resource preservation plan (ARPP). Implementation of the approved ARPP by the archeological consultant shall be required when	Project sponsor archeological consultant, and ERO, in consultation with the affiliated Native American tribal representatives	If significant tribal cultural resources are present, during implementation of the project	Planning Department	Considered complete upon project redesign, implementation of ARPP, or TCR interpretive program, as applicable

[3] The term "archeological site" is intended here to minimally include any archeological deposit, feature, burial, or evidence of burial.

[4] An "appropriate representative" of the descendant group is here defined to mean, in the case of Native Americans, any individual listed in the current Native American Contact List for the City and County of San Francisco maintained by the California Native American Heritage Commission and in the case of the Overseas Chinese, the Chinese Historical Society of America. An appropriate representative of other descendant groups should be determined in consultation with the Department archeologist.

	MONITORING AND REPORTING PROGRAM			
Adopted Mitigation/Improvement Measures	**Implementation Responsibility**	**Mitigation Schedule**	**Monitoring and Reporting Actions and Responsibility**	**Monitoring Schedule**
feasible. If the ERO in consultation with the project sponsor determines that preservation–in-place of the TCR is not a sufficient or feasible option, then the project sponsor shall implement an interpretive program of the TCR in consultation with affiliated Native American tribal representatives. An interpretive plan produced in consultation with affiliated Native American tribal representatives, at a minimum, and approved by the ERO would be required to guide the interpretive program. The plan shall identify proposed locations for installations or displays, the proposed content and materials of those displays or installation, the producers or artists of the displays or installation, and a long-term maintenance program. The interpretive program may include artist installations, preferably by local Native American artists, oral histories with local Native Americans, artifacts displays and interpretation, and educational panels or other informational displays.				
Project Mitigation Measure M-NOI-1 — Construction Noise (Eastern Neighborhoods PEIR Mitigation Measure F-2) The project sponsor shall develop a set of site-specific noise attenuation measures under the supervision of a qualified acoustical consultant. Prior to commencing construction, a plan for such measures shall be submitted to the Department of Building Inspection to ensure that maximum feasible noise attenuation will be achieved.	Project sponsor and construction contractor(s)	Prior to and during construction activities	The project sponsor or construction contractor shall make available a contact number for noise complaints during the construction period and shall file a report with the Planning Department at the conclusion of	Considered complete upon receipt of final monitoring report at completion of construction.

	MONITORING AND REPORTING PROGRAM			
Adopted Mitigation/Improvement Measures	**Implementation Responsibility**	**Mitigation Schedule**	**Monitoring and Reporting Actions and Responsibility**	**Monitoring Schedule**
These attenuation measures shall include as many of the following control strategies as feasible: • Erect temporary plywood noise barriers around a construction site, particularly where a site adjoins noise-sensitive uses; • Utilize noise control blankets on a building structure as the building is erected to reduce noise emission from the site; • Evaluate the feasibility of noise control at the receivers by temporarily improving the noise reduction capability of adjacent buildings housing sensitive uses; • Monitor the effectiveness of noise attenuation measures by taking noise measurements; and • Post signs on-site pertaining to permitted construction days and hours and complaint procedures and who to notify in the event of a problem, with telephone numbers listed.			construction as to the number and nature of such complaints received and the means of resolving each such complaint	
Project Mitigation Measure M-AQ-1 — Construction Air Quality (Eastern Neighborhoods PEIR Mitigation Measure G-1) 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	Project sponsor and construction contractor(s).	During construction activities	Project sponsor to submit certification statement to the ERO	Considered complete on submittal of certification statement and final summary report.

Adopted Mitigation/Improvement Measures	MONITORING AND REPORTING PROGRAM			
	Implementation Responsibility	Mitigation Schedule	Monitoring and Reporting Actions and Responsibility	Monitoring Schedule
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				

Adopted Mitigation/Improvement Measures	MONITORING AND REPORTING PROGRAM			
	Implementation Responsibility	Mitigation Schedule	Monitoring and Reporting Actions and Responsibility	Monitoring Schedule
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 Table below.				

Adopted Mitigation/Improvement Measures	MONITORING AND REPORTING PROGRAM			
	Implementation Responsibility	Mitigation Schedule	Monitoring and Reporting Actions and Responsibility	Monitoring Schedule

Table – 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 on-site construction activities, the Contractor shall submit a Construction Emissions Minimization Plan (Plan) to the ERO for review and approval. The Plan shall state, in

Adopted Mitigation/Improvement Measures	MONITORING AND REPORTING PROGRAM			
	Implementation Responsibility	Mitigation Schedule	Monitoring and Reporting Actions and Responsibility	Monitoring Schedule
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				

Adopted Mitigation/Improvement Measures	MONITORING AND REPORTING PROGRAM			
	Implementation Responsibility	Mitigation Schedule	Monitoring and Reporting Actions and Responsibility	Monitoring Schedule
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 on-site 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.				

2017-009796

1650 MISSION STREET, #400
SAN FRANCISCO, CA 94103
WWW.SFPLANNING.ORG

DISCRETIONARY REVIEW PUBLIC (DRP)

APPLICATION PACKET

Pursuant to Planning Code Section 311, the Planning Commission may exercise its power of Discretionary Review over a building permit application.

For questions, call 415.558.6377, email pic@sfgov.org, or visit the Planning Information Center (PIC) at 1660 Mission Street, First Floor, San Francisco, where planners are available to assist you.

Please read the Discretionary Review Informational Packet carefully before the application form is completed.

WHAT TO SUBMIT:

- ☑ Two (2) complete applications signed.
- ☐ A Letter of Authorization from the DR requestor giving you permission to communicate with the Planning Department on their behalf, if applicable.
- ☑ Photographs or plans that illustrate your concerns.
- ☐ Related covenants or deed restrictions (if any).
- ☒ A digital copy (CD or USB drive) of the above materials (optional).
- ☐ Payment via check, money order or debit/credit for the total fee amount for this application. (See Fee Schedule).

HOW TO SUBMIT:

To file your Discretionary Review Public application, please submit in person at the Planning Information Center:

Location: 1660 Mission Street, Ground Floor
San Francisco, CA 94103-2479

Español: Si desea ayuda sobre cómo llenar esta solicitud en español, por favor llame al 415.575.9010. Tenga en cuenta que el Departamento de Planificación requerirá al menos un día hábil para responder

中文：如果您希望獲得使用中文填寫這份申請表的幫助，請致電415.575.9010**。請注意，規劃部門需要至少一個工作日來回應。**

Tagalog: Kung gusto mo ng tulong sa pagkumpleto ng application na ito sa Filipino, paki tawagan ang 415.575.9010. Paki tandaan na mangangailangan ang Planning Department ng hindi kukulangin sa isang araw na pantrabaho para makasagot.

PROJECT APPLICATION RECORD NUMBER (PRJ)

2017-009796

San Francisco Planning

DISCRETIONARY REVIEW PUBLIC (DRP)

APPLICATION

Discretionary Review Requestor's Information

Name: Julian A. Castaneda

Address: 195 7th Street #406
San Francisco CA 94103

Email Address: julian.castaneda@cornell.edu

Telephone: 585-732-6247

Information on the Owner of the Property Being Developed

Name: Carland, Inc. c/o Ivy Ye

Company/Organization: Carland, Inc.

Address: 735 Montgomery St, Suite 450
San Francisco, CA 94111

Email Address: ivyxy0316@gmail.com

Telephone: 415-792-3564

Property Information and Related Applications

Project Address: 1088 Howard St

Block/Lot(s): Block 3726, lots 030 and 031

Building Permit Application No(s): 2017-009796

ACTIONS PRIOR TO A DISCRETIONARY REVIEW REQUEST

PRIOR ACTION	YES	NO
Have you discussed this project with the permit applicant?	✓	
Did you discuss the project with the Planning Department permit review planner?	✓	
Did you participate in outside mediation on this case? (including Community Boards)		✓

I attempted to file to use the website www.communityboards.org for mediation but the site was not working.

Changes Made to the Project as a Result of Mediation.

If you have discussed the project with the applicant, planning staff or gone through mediation, please summarize the result, including any changes that were made to the proposed project.

On 13 January 2020, five of the owners of condos in our building at 195 7th st., met Jeremy Schaub and Leo Cassidy to discuss our concerns. At this meeting Leo Cassidy identified himself as a "part owner" representing 1088 Howard St LLC. The owners stated that our main concerns were (1) the poison present in the site and how these could affect our residents (2) The variance that the applicant has requested to planning code section 140 will adversely affect the safety of the residents in our building because it will violate Cal. Fire Code 401.2 and 404 (3) The noise of the project will severely and adversely disturb our residents (4) severe limitation of fresh air and light to the units directly adjacent to the proposed project. Mr. Schaub and Mr. Cassidy indicated that they do not intend to change anything in the current design to accommodate our concerns.

DISCRETIONARY REVIEW REQUEST

In the space below and on seperate paper, if necessary, please present facts sufficient to answer each question.

1. What are the reasons for requesting Discretionary Review? The project meets the standards of the Planning Code and the Residential Design Guidelines. What are the exceptional and extraordinary circumstances that justify Discretionary Review of the project? How does the project conflict with the City's General Plan or the Planning Code's Priority Policies or Residential Design Guidelines? Please be specific and site specific sections of the Residential Design Guidelines.

Please see attached document

2. The Residential Design Guidelines assume some impacts to be reasonable and expected as part of construction. Please explain how this project would cause unreasonable impacts. If you believe your property, the property of others or the neighborhood would be unreasonably affected, please state who would be affected, and how.

Please see attached document

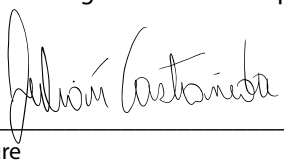
3. What alternatives or changes to the proposed project, beyond the changes (if any) already made would respond to the exceptional and extraordinary circumstances and reduce the adverse effects noted above in question #1?

Please see attached document

DISCRETIONARY REVIEW REQUESTOR'S AFFIDAVIT

Under penalty of perjury the following declarations are made:

a) The undersigned is the DR requestor or their authorized representation.



Signature

Julian A. Castaneda

Name (Printed)

585.732.6247

Phone

jac482@cornell.edu

Email

Relationship to Requestor
(i.e. Attorney, Architect, etc.)

For Department Use Only

Application received by Planning Department:

By: _____ Date: _____

Building Permit Application 2017-009796
Discretionary Review Application

Submitted on 15 January 2020

Application Answers

1. What are the reasons for requesting Discretionary Review? The project meets the standards of the Planning Code and the Residential Design Guidelines. What are the exceptional and extraordinary circumstances that justify Discretionary Review of the project? How does the project conflict with the City's General Plan or the Planning Code's Priority Policies or Residential Design Guidelines? Please be specific and site specific sections of the Residential Design Guidelines.

   The main reasons why we are requesting a Discretionary Review (DR) of the 1088 Howard St Building Permit Application are due to the current owner, Carland Inc [a Plano, Texas- based for-profit company], being represented by Jeremy Schaub, sub-optimally planning their development without taking into full account the needs of the community. More specifically:

- We (the Homeowners Association of 195 7th St, directly adjacent to the 1088 Howard St) know that that the soil 1088 Howard Street is contaminated with poisons, especially lead, given the many decades that this site was used as a paint store. The site mitigation plan found levels of 5,600 mg/kg of LEAD at 3 feet. Per the same report, the San Francisco average is 30-300 mg/kg.

  The proposed project at 1088 Howard St will involve the removal and spreading of more than 50 cubic yards of soil that is contaminated. The 1088 Howard Street site is the former location of the paint store "City Paints." The mixing and manufacturing of these paints at this site may have contaminated the soil at this location. Our concern is that this lead, and other poisons present in the soil, will aerosolized poisons present in the soil when the more than 50 cubic yards of soil is disturbed, and these particulates may be deposited on our residential building, leading to adverse health effects for our residents. We are concerned that there may be other pollutant given that for many years this property has been a manufacturing site. We would like the developer to fund a more comprehensive study with a mutually selected independent testing firm that conducts more testing of the soil at multiple locations throughout the site, and we would like these results to become publicly available.

- We believe that the variance that the applicant has requested to the planning code section 140 will adversely impact the residents of 195 7th Street by violating California Fire Code 401.2 and 404. These codes state that all units are provided a common path of safety egress in the event of a fire or emergency. The project as requested would eliminate the safety egress as it places building directly beside building and would remove all means of escape and area of refuge.

2. The Residential Design Guidelines assume some impacts to be reasonable and expected as part of construction. Please explain how this project would cause unreasonable impacts. If you believe your property, the property of others or the neighborhood would be unreasonably affected, please state who would be affected, and how:

- We believe that the 40+ residents our building, located at 195 7th Street, will be adversely affected by the proposed development because our residents may be inhaling poisons that can severely and adversely affect their health. Lead has been demonstrated to be a potent neurotoxin that can result in permanent and severe deleterious consequence to the developing human brain, and thus the young children that live in our building are at great potential risk.

- The residents of the east side of our 195 7th St building will be seriously affected by their inability to open their only window which faces the proposed construction site. The residents will not be able to get fresh air in their units, which will increase temperatures as well as result in poor air quality. This poses a severe threat to residents with asthma and other respiratory health conditions.

- The proposed building presents a permanent and detrimental risk to the living environment of our residents in the east side of the building due to the close proximity of the proposed building. We expect that the new building being present will result in a higher temperature in the units affected. This will dramatically decrease the comfort of our residents in their units.

- Our four-story building, which now has a parking lot on the east side (where the project is proposed to occur) will have a substantial loss of light due to this new seven-story proposed building. The new building is being built right next to our building, leaving no space in between. The adverse effects will be that the units in the east side will create a cave-like environment, and will adversely affect the enjoyment and privacy of our current roof deck. In addition, the propose building will severely hinder the production of electricity from our recently installed, environmentally conscious solar panels. This will increase our demand for electricity from PG&E, and indirectly increase the amount of greenhouse gases that our building emits into the environment. This is contrary to our efforts that we have made by installing our solar panels.

- Several of our residents in the east side of our building have medical conditions that will be exacerbated by the noise pollution and diminished air quality. For example, we have residents that experience debilitating and incapacitating pain with prolonged exposure to noise of high intensity which are very likely to occur with the proposed project.

3. What alternatives or changes to the proposed project, beyond the changes (if any) already made would respond to the exceptional and extraordinary circumstances and reduce the adverse effects noted above in question #1?

- We request more comprehensive soil testing of the site, with the incorporation of more sampling (the testing conducted in July 2019 only had 4 soil borings). We would like to

the developer to fund such a study by a mutually agreed upon independent testing laboratory and for these results to become publicly available.

- Creation of a permanent buffer space between the new proposed project and our building that can be achieved through the two listed solutions below:

  A) Decrease the size of either "Private Deck" to allow more square feet available to redesign into a larger air well that accommodates the windows of units on east side of building.

  B) Modify current proposed floor plans from four two-bedroom units per level to three two-bedroom units and a one bedroom per level. This would allow more square footage available to accommodate a larger air well on east side of building.

- Provide air conditioning and purified air systems for all of the units in our building that will be impacted by the decrease in air quality due to the 1088 Howard St Project

- Noise-reduction mitigation for the residents directly adjacent to the construction site

- Written assurances that any problems with the shared plumbing system will be addressed by the owners of 1088 Howard St

City and County of San Francisco
DEPARTMENT OF PUBLIC HEALTH
ENVIRONMENTAL HEALTH

London Breed, Mayor
Grant Colfax MD, Director of Health
Stephanie K.J. Cushing, MSPH, CHMM, REHS
Environmental Health Director

28 October 2019

Carland Inc
735 Montgomery Street
San Francisco, CA 94111
Email: ivyxy0316@gmail.com

Subject: **SITE MITIGATION PLAN APPROVAL**
MIXED USE DEVELOPMENT
1088 HOWARD STREET
EHB-SAM NO. SMED: 1611

Dear Ivy Ye:

In accordance with the San Francisco Health Code, Article 22A and the Building Code, Section 106A.3.2.4.1, 106A.3.2.4.2 and 106A.3.2.4.4 – Hazardous Substances; the San Francisco Department of Public Health, Environmental Health Branch, Site Assessment and Mitigation (EHB-SAM) has reviewed the following documents:

1. Phase 1 Environmental Site Assessment Report by ERA Environmental Inc. (ERAS), June 2016.
2. Preliminary Geotechnical Evaluation 1088 Howard Street, by Ninyo and Moore July 2017.
3. Drawings, 1088 Howard Street, San Francisco by Schaub Ly Architects, July 2017.
4. Phase II Work Plan – Shallow Soil Characterization by PII Environmental dated 8 July 2019.
5. Phase II Soil Characterization Report by PII Environmental dated 16 August 2019.
6. Site Mitigation Plan by PII Environmental dated October 14, 2019 by PII Environmental.

On October 30, 2017, EHB-SAM approved and / or accepted previously submitted documents listed in items 1 through 3 above. Please refer to that letter for additional information.

Site Description
The rectangular-shaped subject property is located at 1088 Howard Street, near 7th Street, in San Francisco, California. The subject property is 50 feet east of the northeast corner of 7th and Howard Streets, on the northwest side of Howard Street. The footprint of the 4,500 square foot subject property is covered by a 2-level, 2,250 square foot building used as a retail paint store (Parcel 030) and associated parking lot (Parcel 031). PIIE understands the existing building/structure was built in 1925. The San Francisco County Assessor's Office identifies the 2-parcel subject property as Assessor's Parcel Number (APN) 3726-030 and -031, and parcel dimensions approximate 50 feet along Howard Street by 90 feet deep.

Site History

According to the historical information reviewed, the Property was developed with the current building in the 1920s on a site which has recently been used for a rooming house.
Former site use includes: 1) an ornamental iron company 1925-1930; 2) a soda fountain company 1935-1953; 3) a sausage company in 1958; 4) a refrigerator company 1958-1971; 5) a heating and air conditioning company 1977; and 6) a retail paint company 1990-2016.
Prior building uses are as follows: the Braun-Steeple Ornamental Iron Company from 1925-1930; 2) the San Francisco Soda Fountain Company from 1935-1953; 3) Shensens Purity Sausage Company circa 1953-1958; 4) the California Refrigerator Company from 1958-1971; 5) the Pameco Air, Heating, and Air Conditioning Company circa 1971-1977; and 6) City Paints (a retail paint store) from 1990-2016. The building is currently occupied by a small commercial laboratory.

JC comment: This was a cannabis manufacturing site

Proposed Project Scope

The proposed project includes the demolition of the current building and the construction of a new mixed-use development with 22 dwelling units and one commercial retail space.

Phase II Work Plan

Soil boring B2 will be advanced at the location of the proposed elevator. PIIE proposes to advance and log four exploratory soil borings advanced at random representative locations to depths of 3.0 feet bgs and one exploratory soil boring to a depth of 5.0 feet bgs at the location of the proposed elevator.

Sample Documentation

PIIE will utilize a unique sample numbering system to identify sample locations and depths. Each sample will be designated with the following: 1) Unique soil boring number – "B1 to B5"; and 2) maximum depth – "B1-2.0". A soil sample designated B1-2.0 is therefore a soil sample collected in soil boring B1 from approximately 1.5-2.0 feet bgs. Each respective sample designation will be placed at the top of the sample label and on its own line of the chain of custody form. Based on the limited scope of work and types of analyses, PIIE proposes that no duplicate or trip blank quality assurance/quality control (QA/QC) samples be analyzed.

Phase II Subsurface Investigation Report

This investigation consisted of advancing four exploratory soil borings to approximately 4.0 feet bgs in accessible locations, logging and screening encountered soils, collecting representative soil samples from the borings, and analyzing select representative soil samples for CAM 17 metals including total and soluble lead, total extractable petroleum hydrocarbons (TEPH), and semi-volatile organic compounds (SVOCs).

On July 19, 2019, PIIE advanced four exploratory soil borings B1 through B4 at select locations using a track-mounted, mobile access Geoprobe rig. Each soil boring was explored with a utility probe to 4 feet bgs and a permit was not necessary to perform this scope of work. Soil borings B1 through B4 were advanced in accessible representative locations across the Site. Soil boring B1 was advanced in the northwest area of the property, soil boring B2 was advanced immediately adjacent to the proposed elevator and central portion of the Site, soil boring B3 was advanced in

the southeast central portion of the building, and soil boring B4 was advanced in the southern corner of the property.

Findings

Subsurface Conditions

Surface topography at the Site is relatively flat with a small slope down to the northeast. The asphalt pavement in the parking lot is approximately 3 to 4 inches thick. Fill materials were observed in soil in soil borings B1 through B4 to the total depth 4 feet bgs. The fill materials consisted of primarily of brick fragments with lesser amounts of burnt wood, ash, and debris. Soils in each soil boring consisted primarily of homogeneous, unconsolidated, fine to medium grain, well sorted, gray to reddish brown sand to 3.5 feet bgs, and light brown to yellow brown sand from 3.5 to 4.0 feet bgs. Generally, the observed soils were similar in all four soil borings to the depth of investigation. No field indications of impact were noted in soils in the four soil borings, such as odors, apparent discoloration, or measurable readings with a photoionization detector (PID). Groundwater was not encountered during this investigation and the depth to groundwater has been estimated at 15 feet bgs.

Soil analytical results

Representative soil samples were obtained in soil borings B1 through B4, composited by the laboratory, and selectively analyzed for TEPH as diesel and motor oil-range petroleum Hydrocarbons by EPA method 8015b, CAM 17 metals by EPA method 6010b, and SVOCS by EPA method 8270c. No soluble lead testing was performed. TEPH analytical Results are summarized in table 1 and CAM 17 metal analytical results are summarized In table 2.

TEPH concentrations were reported in the two composite soil samples collected at 0.5- 1.0 foot bgs and 2.5 to 3.0 feet bgs. Lead, antimony, barium, and zinc (metals commonly Used in paint) were elevated in the composite soil sample collected at 2.5-3.0 feet bgs Which was significantly more representative of the soil containing earthquake fill materials.

Soluble lead by stlc and tclp methodology demonstrates that soil to approximately 4.0 feet bgs qualifies as california hazardous soil and non-hazardous federal RCRA soil. With the exception of one detection, no svoc concentrations were reported above their Respective laboratory reporting limit in the two analyzed composite soil samples. Pyrene was reported at 0.098 mg/kg in comp 5-8 at 3.0 feet bgs.

TABLE 1 – TEPH Analytical Results

Sample ID Depth	Depth (ft)	TEPH as Diesel (mg/kg)	TEPH as Motor Oil (mg/kg)
COMP 1-4	0.5 – 1.0	72Y	300
COMP 5-8	2.5 – 3.0	29Y	200
Residential ESL		230	5,100

Note: = Y = Chromatographic pattern does not resemble standard (likely represents weathered hydrocarbons)

TABLE 2 - CAM 17 Metal Analytical Results

Constituent	COMP 1-4@ 0.5ft (mg/kg)	COMP 5-8@ 3ft (mg/kg)	San Francisco Average (ESL)
Antimony	<1.9	15	<1
Arsenic	3.3	5.1	10
Barium	130	470	1,000
Beryllium	0.30	0.36	<1
Cadmium	0.43	0.62	---
Chromium	25	41	100-700
Cobalt	10	7.1	10-70
Copper	35	110	30-150
Lead	87	5600	30-300
Mercury	0.36	0.27	0.2-1.3
Molybdenum	0.71	0.61	<3
Nickel	38	47	20-70
Selenium	<1.9	<1.9	0.1
Silver	<0.24	<0.27	---
Thallium	<0.47	<0.49	---
Vanadium	33	30	100-300
Zinc	130	820	120-190

Notes: All results are in milligrams per kilogram (mg/kg) approximately equal to parts per million (ppm)
< Not detected above laboratory reporting limit indicated
** According to United States Geologic Survey Professional Paper 1270*

Discussion:
This Phase II investigation was performed specifically to characterize soil for suspect constituents of concern and document general quality in soil proposed for excavation and moving onsite to achieve final grade. PIIE understands that little or no soil will require off haul and disposal. The primary suspect constituents of concern were metals (specifically lead), petroleum hydrocarbons, and SVOCs. Site history and observations in the soil borings, soil screening, and the results of analytical testing document that historical commercial use of the building has not impacted the subsurface.

PIIE advanced four continuously-cored exploratory soil borings in random and select representative locations across the Site specifically to collect representative soil samples to 4.0 feet bgs. No evidence of historical Site use impacts was noted during this investigation. Encountered soils consisted of uniform fine to medium grain sand from the surface to 4.0 feet bgs. With the exception of fill, no field indications of impact, such as odor, discoloration, or elevated PID reading were noted in investigated soils.

In all four soil borings, PIIE observed earthquake fill materials in soil from the surface to approximately 36 to 42 inches bgs and elevated total lead was reported in COMP 5-8 (collected at approximately 2.5 to 3.0 feet bgs and representative of the soil from 1.5-4.0 feet bgs). PIIE did not request soluble lead analyses using STLC and TCLP methodology at this time due to the fact that soil off haul is unlikely. Based on Site history, the consistent soil conditions observed across the parking lot, PIIE estimates that similar soils containing earthquake fill and elevated lead are almost certainly present below the building.

Observations and soil sample analytical results documented typical San Francisco shallow soil conditions in the area that burned following the 1906 earthquake. Fill materials, ash and burnt material, and miscellaneous debris in shallow soil contained elevated lead and higher than expected concentrations of TEPH. Due to paint particles in the soil, confirmation soil samples should be collected from a larger volume of soil.

Petroleum Hydrocarbons
TEPH petroleum hydrocarbons were reported ranging from 200 to 300 mg/kg. The reported TEPH concentrations at 1.0 and 3.0 feet bgs were fairly similar and reflect typical TEPH concentrations in soil exhibiting significant amounts of earthquake fill. The TEPH concentrations are below their respective residential ESL values and the reported laboratory flag suggests that the diesel-range hydrocarbons are likely degraded motor oil range hydrocarbons. The source of the TEPH in soil is earthquake fill materials and is likely from tar fragments, asphalt shingles, tar paper, or other roofing materials.

Metals
Lead was reported at a concentration of 5,600 mg/kg in soil containing significant amounts of manmade fill materials. Antimony, barium and zinc were similarly elevated and likely due to painted surfaces that burned in the 1906 Earthquake and fire. The sandy soils at approximately 0.5 to 1.0 feet bgs without fill materials reported significantly less lead, antimony, barium, and zinc, and were more indicative of native metal concentrations. Soluble lead testing utilizing STLC

methodology reported 5.6 milligrams per Liter (mg/L) in soil at 1.0 foot bgs and 60 mg/L lead in soil at 3.0 feet bgs. Soluble lead testing utilizing TCLP methodology reported 0.057 mg/L lead in soil at 3.0 feet bgs.

Antimony was reported at 15 mg/kg. The residential environmental screening level (ESL) for antimony is 11 mg/kg (residential shallow soil exposure, non-cancer hazard) and the commercial ESL is 160 mg/kg. The residential ESL for lead is 82 mg/kg and the commercial ESL is 380 mg/kg.

SVOCs
Composite soil samples collected at 1.0 to 2.0 feet bgs and 3.0 to 4.0 feet bgs were analyzed for SVOCs. With the exception of one detection of Pyrene, no SVOCs were reported in either composite soil sample above laboratory reporting limits. Pyrene was reported at 0.098 mg/kg in COMP 5-8 at 3.0 feet bgs. The residential ESL for Pyrene is 1,800 mg/kg (non-cancer hazard).

Conclusions
Based on representative soil sample analytical results and field observations, PIIE concluded the following:
- Soils at the Site are primarily unconsolidated sand from the surface to approximately 4.0 feet bgs across the Site, and these sands are reported to continue in depth;
- Lead, antimony, and TEPH-range petroleum hydrocarbons were reported at elevated concentrations to a depth of approximately 3.0 to 3.5 feet in native sand soils displaying evidence of fill materials, and soluble lead testing is pending;
- The combination of elevated concentrations of lead, antimony, and zinc suggest impacts in soil from lead-based paint, which historically contained lead in amounts of 7 to 10 percent, or approximately 70,000 – 100,000 mg/kg; this conclusion was confirmed by the significant disparity between soluble lead by STLC and TCLP (60 mg/L versus 0.057 mg/L, respectively);
- With one minor exception, SVOCs were not reported above the laboratory reporting limits and SVOC impacts are generally not suspected in soil at the Site;
- Soil sample analytical results summarized in this report demonstrate that offsite disposal of potential excess soil will be costly and existing soil should be kept onsite during construction and development;
- Due to lead-based paint particles in the soil, more representative soil sampling methods are necessary to more accurately determine total lead concentrations; for example, composite sampling a larger volume of soil from soil stockpiles and trenches will most likely result in lower total lead concentrations;
- Soil remaining at the extent of proposed excavation will likely not meet residential criteria for total lead and composite verification soil sampling following proposed soil excavation and grading activities is warranted;
- Based on the soil sample analytical results, DPH-SAM will request a SMP prior to Site development and will request a Cap Maintenance Plan (CMP) and deed restriction following development to address elevated lead concentrations in soil.

<u>Site Mitigation Plan</u>
PII Environmental (PIIE) has prepared this Site Mitigation Plan (SMP) to describe procedures and agreements that is in effect during soil removal and encapsulation activities at 1088 Howard Street,

San Francisco, California. This SMP summarizes tasks necessary to safely mitigate potential human health issues related to excavating lead-impacted soil under currently applicable regulations.

The scope of work to be performed at the Site will consist of:

- Excavating soil materials to install the foundation and any footers;
- Excavating excess soil materials to achieve finished grade;
- Stockpiling, handling, and loading excess soil for proper offsite disposal; and
- Collecting confirmatory soil samples at the extent of excavation and analyzing the soil samples for constituents of concern.

Soil Remediation:

Remedial soil excavation is not being proposed during bulk excavation; however offsite disposal of excess soil will remediate a portion of the lead-impacted soil. In the event unknown conditions, odor, or apparent soil discoloration are noted in soil at the extent of excavation, representative soil samples will be collected in those locations to characterize this soil and help evaluate the need for potential soil remediation.

Encapsulation:

DPH routinely approves encapsulation of lead-impacted soil onsite. In order to remove the appropriate volume of soil necessary to construct the proposed building foundation and encapsulate lead-impacted soil beneath the mat slab, the following steps should be performed:

1. Surface soil to an approximate depth of 2.0 feet bgs containing fill materials will be moved around the property and graded as necessary;
2. The minimal volume of excess soil should be excavated and disposed offsite after being profiled using the existing soil analytical data;
3. Calculate the volume of soil lost due to soil compaction efforts to ensure that the proper minimal volume of soil has been removed to achieve final grade following backfilling with new clean backfill material; and
4. Take any and all steps necessary to fulfill the goal of successfully encapsulating lead impacted soil onsite under the proposed mat slab foundation and dispose of excess soil after being profiled.

The general intent of this work is to leave lead-impacted surface soil onsite and encapsulated under the proposed building foundation. Confirmation soil sampling at the extent of excavation is not warranted. No other constituents of concern are suspected in shallow soil.

Pathways for Hazardous Substance Dispersion:

The potential exists for lead in soil to be dispersed from the soil through particulates in air during soil excavation and loading activities or by carrying "dust" off the Site by personnel or equipment. Dispersion by air shall be controlled by using "dust" control measures, enforcing site control measures, and erecting perimeter access control such as fencing, barricades, or caution tape. Soil particulates may also be ingested through hand to mouth contact, poor personal hygiene, and inadvertently ingesting soil by drinking, eating, or smoking.

Air monitoring and Best Management Practices will be performed to demonstrate that proper "dust" suppression eliminates or significantly reduces potential exposure via inhalation of soil particulates, and enforcing a site-specific HSP and good worker hygiene in the construction zone

eliminates or significantly reduces potential exposure via inhalation or ingestion of soil particulates.

Health and Safety Plan and Soil Management Plan Availability:
Any site specific HSP and this SMP should be available to: employees, employee designated representatives, Owners and their representatives, and personnel of federal, state, or local agencies. The HSP should specifically address the potential for exposure to lead in soil and include mitigation measures to prevent ingestion of lead. A copy of PIIE's site-specific Health & Safety Plan is included in Appendix 3 of the report submitted to EHB-SAM.

Soil Removal Protocol and Procedures:
A designated work boundary shall be established for soil excavation activities at the Site. During soil excavation activities, all exposed soil surfaces should be kept visibly moist by water spray. Transport vehicles should be loaded on pavement capable of being properly cleaned or appropriate plastic sheeting during loading activities. Air monitoring should be conducted in accordance with the HSP at the worker breathing zone and downwind of the work boundary. Since the Site is surrounded on three sides (northwest, northeast, and southwest) by existing 4-story and 5-story buildings, air monitoring will be primarily performed southeast on Howard Street in the downwind direction.

During periods of inactivity longer than 12 hours, exposed soil should be covered with minimum 10-mil plastic sheeting or other covering to minimize soil dispersion and drying.
Security fencing should be locked and open excavations will be demarcated with barricades and/or caution tape during periods of inactivity and at the end of each workday to reduce the potential of personnel falling into the excavation. The excavation will be maintained to mitigate physical hazards to personnel working in or entering the area after soil removal is completed. Soil excavation and removal will extend to an estimated depth of 4.0 feet below original ground surface.

During excavation, any unknown subsurface equipment, including metallic vessels, oil water separators, drums, and metal piping, shall be placed on plastic sheeting for inspection by the Environmental Consultant. In the event an underground storage tank(s) (UST) is encountered, excavation will immediately cease at that location and the tank will be inspected by the Environmental Consultant. Any identified USTs should be removed under an expedited tank removal permit. In the event soil is uncovered displaying significant odor or discoloration, excavation will immediately cease at that location and the soil will be inspected by the Environmental Consultant. If the volume of suspect soil is relatively small (10 cubic yards or less), it can be removed and placed on plastic sheeting for subsequent inspection and sampling.

Noise:
Consistent with City of San Francisco construction noise ordinances, all work will be performed between 7 AM and 7 PM, Monday through Friday. Any work performed on Saturday or Sunday will be performed between 9 AM and 5 PM. Any work producing noise greater than 75 decibels, such as jack hammering, should be performed between 9 AM and 5 PM only.

Soil Particulates (Dust):
As specified in Construction Dust Control Ordinance 176-08, recently codified as San

Francisco Health Code Articles 22B, all site preparation work, demolition, or other construction activities that have the potential to create dust or will expose or disturb more than 10 cubic yards or 500 square feet of soil must comply with specified dust control measures whether or not the activity requires a permit from the Department of Building

Inspection. The intent of this ordinance is to reduce the quantity of dust generated during site preparation, construction and demolition in order to protect the health of the general public, protect the health of on-site workers, minimize public nuisance complaints, and avoid orders to stop work by the Department of Building Inspection or SFDPH.

Provisions summarized below constitute a Dust Control Plan as required by Article 22B:
□ Concrete being prepared for demolition will be watered as necessary to avoid creating visible dust at all times;
□ All active construction areas will be watered no less than three times per shift per day to eliminate visible dust at all times;
□ Additional watering will be performed whenever wind speed exceeds 15 miles per hour, and two or more streamers will be placed in visible locations to estimate / confirm approximate wind direction and speed;
□ Watering should moisten soil only and no water runoff should be produced at any time;
□ At the end of each work day, all streets, sidewalks, paths, and intersections where work occurred will be wet swept or vacuumed to remove visible soil;
□ Cover any inactive soil piles (soil not expected to be disturbed for more than seven days) with 10 mil (0.01 inch) plastic sheeting or equivalent tarp and braced down to avoid drying and wind damage;
□ One portable, hand-held Extech VPC300 Particle Counter (or equivalent Particulate Dust Monitor) will be used to monitor particulates in air along Howard Street, and data reviewed for purposes of determining background and/or dust levels in wind entering and leaving the subject Site;
□ Action levels are particulates greater than 250 mg/m3 over a 5 minute period and an average particulate level greater than 50 mg/m3 over a 24 hour period, however all soil excavation is anticipated to be performed in one to two 8-hour days;
□ Signage will be placed on Howard Street to inform surrounding community members of the hotline phone number(s) to call and report visible dust problems;
□ All loading trucks or metal bins carrying excavated material will be below the sides and back of the truck or bin, and loaded soils will be properly covered to avoid dust and soil drying during transport; excavated materials must be moistened prior to transport;
□ Truck tires will be brushed prior to leaving the Site and the truck loading area on Howard Street will be routinely swept (2X per day) and cleaned to avoid creating visible dust; and
□ Terminate soil handling activities when the wind speed exceeds 25 miles per hour, or visible dust is being created that cannot be mitigated by soil moistening.

Instrumentation and Methodology:
The Extech VPC300 simultaneously displays particle sizes of 10 microns, 5 microns, 2.5 microns, 1.0 micron, and 0.5 micron, and is a superior instrument to differentiating background particulates in air entering the Site from "dust" that may be created during construction and soil handling activities.

Particulate Monitoring:
The VPC300 Particle Counter (or equivalent) should be used in two ways: 1) to confirm background particulate (dust) concentrations in air along Howard Street; and 2) to obtain particulate concentrations at the exit gate to the Site on Howard Street and the downwind corner of the property during normal activities to document actual particulate levels leaving the Site and ensure dust suppression is adequate.
General Contractor: Transatlantic Construction
Onsite Project Manager: Mr. Leo Cassidy
Office Contact Number: TBD
Mobile Contact Number: 415-244-1202
Excavation Contractor: Transatlantic Construction
Contractor Phone Number: 415-244-1202
Environmental Consultant: PIIE, David DeMent
Mobile Contact Number: 510-520-2372
Specific measures will be implemented by the Excavation Contractor based on previous experience handling similar lead-impacted soils in San Francisco.

Contractor Specific Measures:
During grading, excavation, and compacting activities, misted water may be used to minimize fugitive particulate emissions. Stock piled spoils should be moistened and covered until they are disposed.
During work operations, water will be used to wet down the area that is being excavated. During the excavation process, water spray should be used to minimize any fugitive particulate emissions. The ground will be sprayed with to minimize fugitive particulate emissions from haul trucks and excavation equipment. Water will be obtained from onsite or from the closest fire hydrant. During the loading of the trucks with excavation debris, a water spray will be used to minimize fugitive particulate emissions. The trucks will have tarpaulins installed to cover their loads prior to leaving the site to ensure there are no particulate emissions occur while the trucks are in transit.

Contractor Procedures to Minimize Fugitive Particulate Emissions:
a) Water sprays will be used to minimize fugitive particulate emissions during active excavation, stockpiling, and loading material.
b) A supervisor will monitor the excavation process and ensure that water sprays are turned on as required to minimize fugitive particulate matter emissions.
c) A log of the dates and times the water sprays are turned on and off will be maintained, or water will be applied on a scheduled basis at least four times per shift.
d) Water sprays will be used to minimize potential fugitive particulate emissions from the removal of any encountered concrete.
e) A supervisor will monitor the removal of any concrete and ensure that the water sprays are turned on as required to minimize fugitive particulate emissions.
f) A log of the dates and times the water sprays are turned on and off for encountered concrete should be maintained.
g) Water sprays will be used to suppress the dust and minimize fugitive particulate emission from the movement of haul trucks and excavation equipment.

h) A supervisor will monitor the movement of haul trucks and excavation equipment and ensure that either a water truck or water sprays are used as required to minimize fugitive particulate emissions.
i) A log will be maintained of the dates and times the water sprays are turned on and off or the water truck is used.
j) Tarpaulins will be fitted to trucks hauling excavation debris off site, to minimize potential fugitive particulate emissions.
k) A supervisor will ensure that all haul trucks leaving the site with excavation debris will be fitted with a tarpaulin to minimize fugitive particulate emissions.

Management of Excavated Soil:
The Environmental Consultant will observe initial soil excavation activities to help ensure worker safety, compliance with this SMP, document all pertinent soil removal efforts, and collect confirmation samples at the extent of excavation to document remaining soil conditions according to SFDPH requirements.
As necessary, excavated soil will be stockpiled and covered with heavy duty plastic sheeting, 10-mil or thicker. When not covered, soil stockpile surfaces will be kept visibly moist by water spray. Stockpiled soil will then be loaded into transport vehicles for offsite disposal. Transport vehicles will be covered with plastic sheeting or tarp during transportation. Heavy duty plastic sheeting will be placed on the ground at the loading site to prevent transport vehicle tires from contacting contaminated soil and to minimize suspect lead-impacted soil falling off the transport vehicle during loading and contacting bare soil. As necessary, transport vehicle tires should be swept prior to departure to prevent contaminated soil from leaving the loading site.

Specific Soil Handling & Stockpiling Tasks
Based on site observations, feasibility in the field, and upon the direction of the Environmental Consultant, the Excavation Contractor shall:
□ Segregate and stockpile any soils displaying field indications of impact (odor, discoloration, and fill materials), moisten the material to control dust, and covering with plastic sheeting to minimize soil drying pending loading for offsite transport; if there is any question as to the appropriate manner to stockpile this material, consult the Environmental Consultant;
□ To the extent feasible, remove any foreign materials that can be cost effectively recycled or disposed at an accepting landfill, such as concrete, brick, asphalt, wood, and metal and place in a separate location;
□ To the extent feasible, minimize drop heights while loading soil transportation vehicles; and
□ Stockpiled soils should be watered and covered with plastic sheeting at the end of each business day.
Confirmation Soil Sampling
Following excavation to the desired depth, any field indication of impact, if present, will be logged. Site conditions at the limits of excavation will be photo-documented. Based on previous soil characterization, confirmation soil samples are not warranted unless new unknown concerns are uncovered during excavation. If indications of unknown impact are discovered, appropriate soil samples will be collected at the extent of excavation in the location of concern and analyzed for likely constituents of concern. The purpose of any soil sampling will be to further characterize remaining soil following excavation and determine if remedial soil removal is warranted.

If any unknown tanks, sumps, drains, vaults or soils displaying field indications of impact are located during excavation, PIIE will be contacted for inspection. If no liquids, obvious soil staining, or obvious odor are noted, the identified structure will be demolished and disposed. If liquid is present within the structure, or obvious odor or soil staining is noted, PIIE may sample affected media to determine appropriate disposal and document the incident. If stained or odorous soil is encountered and PIIE cannot inspect that business day, the area should be covered with plastic sheeting until it can be inspected and/or sampled.

Confirmation Water Sampling
Dewatering will not be required during excavation.

For further details refer to the documents submitted to EHB-SAM by PII Environmental.

A closure Report will be prepared and submitted to EHB-SAM at end of the completion of the project. This report shall detail a chronology of the construction events, such as soil excavation activities and management activities, as well as summaries of analytical data, bills of lading, manifests, weight tickets, certificates of treatment/disposal of soil and a description of all mitigation activities at the site. This report must also contain certification statement that states that all mitigation activities have been duly performed in accordance with this SMP.

Based on review of documents (1 - 6) EHB-SAM approves this Site Mitigation with the following added conditions. EHB-SAM recommends that dust curtains or windbreaks be installed along the property line of the project site. Post the hotline telephone number/website/email address for community members to call along the fence line. Install at a minimum an air particulate measuring instrument at both upwind and downwind directions of the active work site whose data can immediately be retrieved and shared with potential complainants and the Director of Environmental Health as part of complaint resolution process.

Please be aware that a Deed Restriction and Cap Maintenance Plan (CMP) is necessary at this property so as to capture the issue of the lead contaminated soil that is still left in the ground and soil on the site.

Should you have any questions please contact me at (415) 252-3892 or joseph.ossai@sfdph.org.

Sincerely,

Joseph Ossai

Joseph Ossai, MSEE, PE, REHS
Senior Environmental Health Inspector

cc: Jeanie Poling, San Francisco Planning Department
Daniel Lowrey, San Francisco Department of Building Inspection
Gary Ho, San Francisco Department of Building Inspection
Carrie Pei, San Francisco Department of Building Inspection
PII Environmental (david.dement@ymail.com)


affic and nearby places
Clockwork Productions
Parking lot
Howard St
Howard St
Howard St
Tony Baloney's
7th St
7th St
Google


CITY PRINTS
Parking lot

communityboards
Building Community Through Conflict Resolution

601 Van Ness Avenue, Suite 2040
San Francisco, CA 94102
Telephone: (415) 920-3820

Start a Mediation

Error occurred while sending the message:
You must provide at least one recipient email address.

Your Information (Su Información)

Your Name (Nombre)*

Address (Dirección)*

Email (Correo electronico)

(valid email required)

Best phone number to reach you (Teléfono)*

Other Person's Information (Información de la otra persona)

Please provide as much information as you know. (Por favor,

Email (Correo electronico)

What is your relationship to this person? (¿Cuál es su relación con esta persona?)

RESPONSE TO

DISCRETIONARY REVIEW (DRP)

SAN FRANCISCO PLANNING DEPARTMENT
1650 MISSION STREET, SUITE 400
SAN FRANCISCO, CA 94103-2479
MAIN: (415) 558-6378 SFPLANNING.ORG

Project Information

Property Address: 1088 Howard Street Zip Code: 94103

Building Permit Application(s): 2018-0702-3483

Record Number: 2017-009796 Assigned Planner: Monica Giacomucci

Project Sponsor

Name: 1088 Howard Street LLC, c/o Leo Cassidy Phone: (415) 244-1202

Email: leo@transatlanticinc.net

Required Questions

1. Given the concerns of the DR requester and other concerned parties, why do you feel your proposed project should be approved? (If you are not aware of the issues of concern to the DR requester, please meet the DR requester in addition to reviewing the attached DR application.)

The project has been reviewed by Planning, DBI, SFFD, and DPH, and meets all of their standards for appropriateness and life safety. We are proposing to add 24 new two bedroom units to a surface parking lot, including three on-site BMR units. Our lightwell is larger than the DR requestor's, and matches most of the length. The DR Requestor's concerns do not rise to the level of exceptional and extraordinary.

2. What alternatives or changes to the proposed project are you willing to make in order to address the concerns of the DR requester and other concerned parties? If you have already changed the project to meet neighborhood concerns, please explain those changes and indicate whether they were made before or after filing your application with the City.

The Department of Public Health has already required the site to go through remediation for possible lead contamination. The Variance for the rear yard was requested via the PPA process, to better acknowledge the mid-block open space. That guidance is contrary to the DR request that we shift the required rear yard adjacent to our side neighbor. Our project has also been designed as an addition to an historic resource, and needs to be shaped to respect the original front facade.

3. If you are not willing to change the proposed project or pursue other alternatives, please state why you feel that your project would not have any adverse effect on the surrounding properties. Include an explaination of your needs for space or other personal requirements that prevent you from making the changes requested by the DR requester.

The adjacent building was constructed in 1994, and should have met all life-safety standards in place at that time. Adjacent properties are not allowed to provide for required light, ventilation, egress, or drainage without a recorded easement. Appropriate mitigation measures as regulated by city agencies will help alleviate construction impacts.

Project Features

Please provide the following information about the project for both the existing and proposed features. **Please attach an additional sheet with project features that are not included in this table.**

	EXISTING	PROPOSED
Dwelling Units (only one kitchen per unit - additional kitchens count as additional units)	0	24
Occupied Stories (all levels with habitable rooms)	1 + Mezzanine	7
Basement Levels (may include garage or windowless storage rooms)	0	0
Parking Spaces (Off-Street)	±5	0
Bedrooms	0	48
Height	21'-0"	70'-7"
Building Depth	90' 0-1/2"	90' 1-1/2"
Rental Value (monthly)	N/A	Unknown
Property Value	$3,100,000	Unknown

I attest that the above information is true to the best of my knowledge.

Signature:  **Date:** 2/4/20

Printed Name: Jeremy Schaub, Schaub Ly Architects

☐ Property Owner
☑ Authorized Agent

If you have any additional information that is not covered by this application, please feel free to attach additional sheets to this form.

REUBEN, JUNIUS & ROSE, LLP

Mark Loper
mloper@reubenlaw.com

March 30, 2020

Delivered Via Email (david.winslow@sfgov.org)

President Joel Koppel
San Francisco Planning Commission
1650 Mission Street, Suite 400
San Francisco, CA 94103

Re: 1088 Howard Street (3726/030 and 031); Case No. 2017-009796DRP
Project Sponsor's Brief for April 16, 2020 hearing
Our File No.: 10894.03

Dear President Koppel and Commissioners:

Our office represents 1088 Howard St., LLC (the "**Project Sponsor**"), the owner of the property located at 1088 Howard Street (the "**Property**"). The Project Sponsor proposes to preserve a portion of the existing historic industrial building at the Property and construct a seven-story, 24,057 square foot building with 24 two-bedroom dwelling units, including three affordable units, and ground floor retail space (the "**Project**"). The Property is located in the Mixed Use-General ("**MUG**") zoning district, where housing is encouraged over ground floor commercial uses.

A Discretionary Review ("**DR**") request was filed by Julian A. Castaneda, a condominium owner in the building adjacent to the Project at 195 7th Street. The DR Requestor does not identify any exceptional or extraordinary circumstances that merit taking discretionary review or making modifications to the Project. The DR request should be denied and the Project approved as designed for the following reasons:

- Compatibility with Design Guidelines. The Project is appropriate and desirable in use, massing, size, and overall scope. It is compatible with the surrounding neighborhood and is consistent with the Residential Design Guidelines ("**RDG**") and the Planning Code, in particular the rear yard location—which matches the existing pattern on the block that includes a large outdoor children's play area.

- Light, Air, and Privacy. The Project provides a light well on floors two through seven on the western façade that measures 3 feet by 25 feet 9 inches. The Property is located in a densely populated area where the prevailing neighborhood pattern is to construct buildings to the full width of the lot, with most structures abutting each other. Nevertheless, the matching oversized

light well proposed by the Project maintains adequate access to light, air, and privacy for the adjacent neighbors. This shared light well matches at least one or two windows for each unit facing the Project site. The Project's windows will be staggered to break the line of sight between the two buildings. The Project—two stories shorter than the 85-foot height limit—also will not significantly alter access to light for the adjacent building's solar panels.

- Construction Noise. The Project Sponsor is sensitive to the DR Requestor's concerns regarding construction noise and will take all necessary measures to mitigate these impacts to the extent possible, including adhering to all San Francisco Police Code requirements pertaining to construction times.

- Rear Yard and Dwelling Unit Variance. The Project's requested variance for rear yard and dwelling unit exposure should be granted because the Project will be set back to preserve the character of the existing historic building and will also provide matching light wells on both the eastern and western sides of the building to accommodate the existing light wells of the adjacent buildings. As a result, in order to accommodate 24 much-needed two-bedroom units, the Project is required to occupy a portion of the required rear yard. Despite the requested variances, the Project will provide ample open space.

- Soils Conditions. Pursuant to a Site Mitigation Plan approved by the Department of Public Health, the Project's construction activities include a number of best practices to safely remove soils on-site and protect future residents and neighbors. These include encapsulation; dust control and soil removal measures such as watering, covering stockpiled soil with heavy plastic before removing it, and stopping soil disturbing activities if wind speeds get above 25 MPH; and ongoing particulate monitoring during construction.

- Neighbor Discussions. The Project Sponsor has engaged in discussions with DR Requestor and other residents of the adjacent building. After a meeting facilitated by Supervisor Matt Haney's office, the Project Sponsor made a settlement offer addressing concerns raised by neighbors, but the offer was rejected.

A. Property Description

The Property is located within the MUG zoning district, the 85-X height and bulk districts, and the SOMA Youth and Family Special Use District. The Property consists of two adjacent lots: (1) a 2,247 square foot lot improved with a surface parking lot; and (2) a 2,247 square foot lot currently improved with a mezzanine over one-story industrial building, which is a contributor to the Western SOMA Light Industrial and Residential Historic District.

B. Project Description

The Project will partially preserve the existing facade on the site and construct a seven-story 70' 7" mixed-use residential building with 24 two-bedroom dwelling units, including three below market rate units on-site. In addition, the Project provides 2,559 square feet of ground-floor retail space along Howard Street and includes a total of 2,565 square feet of open space for the

building's residents, consisting of two private decks at the rear of the second floor, a private deck on the third floor, and a 1,680 square foot roof deck. The Project does not propose any off-street parking, but provides 24 Class 1 and 2 Class 2 bicycle parking spaces for the residential and retail uses.

To preserve the character of the existing historic industrial building, the eastern portion of the new building will include a 10-foot setback along Howard Street to distinguish the new construction from the existing. The floor level of the existing mezzanine will now become residential, preserving the original glazing patterns.

As explained in more detail below, the Project has been designed to complement and enhance the existing neighborhood character and to respect the concerns raised by the DR Requestor, while adding 24 units and 48 much-needed bedrooms to the City's housing stock.

C. Neighborhood Outreach and Design Development

The Project team has spent a considerable amount of time and effort meeting with the DR Requestor and other condo owners in the adjacent building to listen to and work through concerns regarding the Project including the following meetings:

1. June 28, 2018: Formal Pre-Application meeting.

2. January 13, 2020: Meeting with the 195 7th Street HOA.

3. March 4, 2020: Meeting with the 195 7th Street HOA attended by the Project's team, including geologist, David Dement, Abigail Rivamonte Mesa (Supervisor Matt Haney's Chief of Staff), preservation and current planners Monica Giacomucci and Richard Sucre, and environmental planners Ryan Shum and Debra Dwyer.

Thus, efforts were made throughout the process to meet with the HOA, including the DR Requestor in order to discuss the Project and their concerns. The Project has been reduced in size from its original conception. The Project sponsor made a settlement offer addressing concerns raised at the meeting with the Supervisor's Office, but it was rejected. Design changes include the following:

- -Stagger the front building wall. The left side should be at the street, while the right side should be pushed back above the historic façade.
- -Vehicle parking is removed, Commercial area is increased.
- -Reorganize residential entry for better street presence.
- -Simplify material palette and window mullions.
- -Stagger the rear building wall, to align with both neighbors' rear walls.
- -Match adjacent lightwells for at least 75% of length, by 3' deep.
- -Integrate the existing commercial mezzanine into residential space.

The net effect of these changes is to ensure access to light and air and to maintain privacy for the adjacent neighbors, while also responding to the Planning Department's design guidelines.

D. Standard for Discretionary Review

Discretionary review is a "special power of the Commission, outside of the normal building permit approval process. It is to be used only when there are exceptional and extraordinary circumstances associated with the proposed project."[1] It is a "sensitive discretion … which must be exercised with the utmost restraint."[2] Exceptional or extraordinary circumstances have been defined as complex topography, irregular lot configuration, unusual context, or other circumstances not addressed in the design standards.

The DR power provides the Planning Commission with the authority to modify a project that is otherwise Code compliant, and while the Commission has a great deal of latitude in hearing DR cases, the DR power can be exercised only in situations that contain exceptional or extraordinary circumstances. No such circumstances exist here. As described in detail below, the DR requestor has failed to establish any exceptional or extraordinary circumstances that are necessary for the Planning Commission to exercise its DR power, and thus the request for DR should be denied.

E. Reponses to DR Requestors' Concerns

1. The Project is consistent with the RDG.

The Project is consistent with the RDG, as determined by Planning staff. The RDG sets forth a general guideline to "[d]esign the scale of the building to be compatible with the height and depth of surrounding buildings."[3] But the same guideline notes that a "building that is larger than its neighbors can still be in scale and be compatible with the smaller buildings in the area…by facade articulations and through setbacks to upper floors."[4] The guidelines also note that "in areas with a dense building pattern, some reduction of light to neighboring buildings can be expected with a building expansion."[5] Similarly, "some loss of privacy to existing neighboring buildings can be expected with a building expansion."[6]

Although some impacts are expected, the Project has been designed to reduce such impacts and to make the Project compatible with the neighborhood. These design features include setting back the eastern front façade, incorporating matching light wells, adding window configurations that break the line of sight with the adjacent neighbors, and setting back the rear of the building.

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[1] Planning Department informational packet for Discretionary Review available at: http://forms.sfplanning.org/DRP_InfoPacket.pdf.
[2] *Id.*
[3] Residential Design Guidelines, p. 32.
[4] *Id.*
[5] Residential Design Guidelines, p. 16.
[6] Residential Design Guidelines, p. 17.

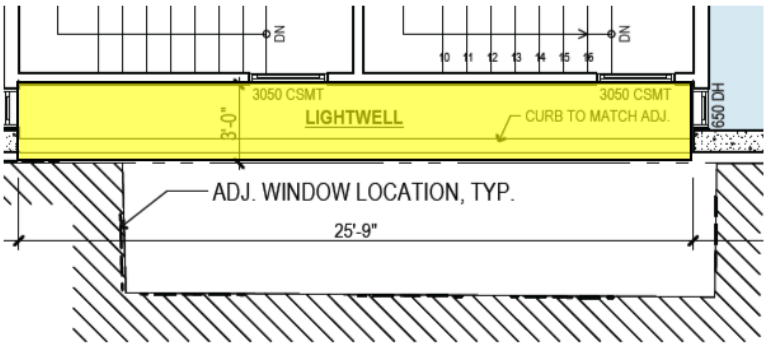
2. The Project provides adequate light, air, and privacy to the DR Requestor's property.

The Project's design is sensitive to the DR Requestor's concerns regarding light, air, and privacy where the prevailing neighborhood pattern shows that buildings are constructed to the full width of the lot, with most structures abutting each other.

Even so, the Project was carefully designed to maintain privacy and provide adequate light and air to 195 7th Street. Specifically, the Project, which is approximately 14 feet lower than the maximum 85-foot height limit, provides a matching oversized light well on floors two through seven that is 25 feet and 9 inches long and 3 feet deep (see figure below). This shared light well matches at least one or two window for each unit facing the Project site.[7] The Project's windows will be staggered to break the line of sight between the two buildings. Therefore, the proposed light well will allow adequate access to light and air for the existing northeast-facing windows at 195 7th Street.

[7] It is unclear how DR Requestor's property could be built with property line windows as this is not allowed per the Building Code and should not have been allowed when this building was constructed. There are no Notices of Special Restriction on the development site establishing a no-build area.

195 7th Street light well



The Project's proposed light well

The DR Requestor asserts that the Project will "severely hinder the production of electricity" from the building's solar panels. However, given the orientation of the solar panels to the southwest and angled directly away from the proposed building—i.e. 180 degrees away from the Project site—the project should not adversely affect the ability of these panels to collect sufficient sunlight. The large shared light well ensures that the adjacent property will receive adequate light and air.

The DR Requestor first proposes that the size of the private decks should be reduced to accommodate an even larger light well. However, this outcome is not possible because rear private decks are only provided on the second floor, while the third through seventh floors of the Project will be set back from the rear property line. The first floor will extend to the rear property line and the second floor will provide two rear open spaces: a 515 square foot private deck on the eastern side of the building with an approximate 25 foot depth and a 225 square foot private deck on the western side of the building with a 10 foot depth. Note that these decks have already been reduced from 598 square feet and 231 square feet, respectively. Floors three through seven will not include any rear private decks and will not extend to the rear property line. Therefore, further decreasing

the size of the second floor decks would not accommodate a larger light well on the remaining floors. Nevertheless, as described above, the Project's large light well will provide adequate light and air to the DR Requestor's building.

The DR Requestor alternatively proposes that the Project be modified from four two-bedroom units per level to three 2-bedroom units and one 1-bedroom unit per level to accommodate a larger light well. Decreasing the number of much-needed bedrooms is contrary to the goals of the MUG zoning district, as well as the policies and objectives of the East SoMa Area Plan to provide more family housing. The Project provides 24 family-sized two-bedroom units, three of which would be provided as below market rate, in the South of Market neighborhood. Increasing the size of the already large light well would therefore result in the loss of six much-need two-bedroom units during the City's housing crisis.

Together, the Project as currently designed will maintain adequate light, air, and privacy to the DR Requestor's building.

3. Construction Impacts and Soils Best Practices

The DR Requestor also expressed concerns about the impacts of construction noise. The Project will comply with San Francisco Police Code Section 2908, which states that building construction can only occur between the hours of 7AM and 8PM.

In addition, a construction noise mitigation measure has been applied to the Project, which requires the Project to develop noise attenuation measures under the supervision of a qualified acoustical consultant. As required by the mitigation measure, this plan will be submitted to the Department of Building inspection prior the beginning of construction. And a contact number for noise complaints during the construction period will be provided.

DR Requestor also raises concerns about the condition of soils beneath the Project site. The Project's Site Mitigation Plan (attached as **Exhibit A**) and the San Francisco Department of Public Health's approval of that plan (attached as **Exhibit B**) ensure that the Project's construction activities will utilize best practices to ensure the site is developed consistent with all applicable laws and DPH's best practices.

The Plan involved four explaoratory borings at select locations throughout the Property, including one immediately adjacent to the existing buildings. Fill materials consisted primarily of brick fragments with lesser amounts of burnt wood, ash, and debris—typical for locations in the "fire zone" of the 1906 earthquake (see **Exhibit B,** pg. 5: "soil sample analytical results documented typical San Francisco shallow soil conditions in the area that burned following the 1906 earthquake.") This is likely due to the lead-based paint used on the structure that burned following the earthquake (**Exhibit B**, pg. 6.) Due to the soil results, DPH also requested a "Cap Maintenance Plan" and deed restriction following development.

DPH also approved a Site Mitigation Plan that takes measures necessary to safely address the presence of lead in the soil. This includes:

1. **Encapsulation**. The Project will be constructed with a mat slab foundation at a depth of two feet below ground level (it has no below-grade parking), which will encapsulate the majority of existing on-site soils beneath the cement slab. Before encapsulation, soil will be compacted to the extent possible, and excess soil will be disposed off-site.

2. **Dust control measures**. The Project will implement best practices to minimize dust, including complying with San Francisco's Construction Dust Control Ordinance. The Ordinance regulates site prep work, demolition, and other construction activities.

   All active construction areas must be watered at least three times per shift per day to eliminate visible dust. If wind speeds exceed 15 MPH, additional watering is required. Soil handling activities are required to stop entirely if wind speeds reach 25 MPH or visible dust is being created. All streets and sidewalks must be wet swept or vacuumed to remove visible soil at the end of each workday. Inactive soil piles must be covered and braced down. A hand-held particulate monitor will be used to monitor particulates in the air along Howard Street. Loaded soils will be properly covered to avoid drying or dust release during transport, and excavated materials must be moistened before leaving the site.

3. **Soil removal measures.** Soil removal protocol includes keeping all exposed soil surfaces visibly moist by water spray, air monitoring, covering any exposed soils during longer periods of inactivity, and keeping trucks taking away the soil in an area where remaining soils can be easily cleaned. Specifically, excavated soil will be stockpiled and covered with heavy duty plastic sheeting, and then loaded into transport vehicles for offsite disposal. The vehicles will be covered with plastic sheeting or a tarp, and plastic sheeting will also be placed on the ground.

4. **Particulate monitoring**. The hand-held particulate monitor—a VPC300 Particle Counter or equivalent—will be used to measure baseline dust concentrations in the air and obtain particulate concentrations along Howard Street and the downwind corner of the property during construction activities.

F. Variance

The Project seeks a variance for rear yard and dwelling unit exposure. Granting of the variance is appropriate because the Project proposes to preserve the existing historic building. As such, the addition must be set back, thereby reducing the available buildable area. In addition, the

buildable area is further reduced to accommodate light wells for both of the adjacent properties. In fact, most of the other buildings in the neighborhood, including the DR Requestor's building, do not provide Code-compliant rear yards or dwelling unit exposure.

The DR Requestor claims that the Project would "eliminate the safety egress" and "remove all means of escape and area of refuge." The Building Code requires on-site egress, or an easement, and there is no such easement on title of the Project site. The Project itself meets all emergency egress requirements.

G. Conclusion

The DR Requestor has failed to establish exceptional or extraordinary circumstances that would justify the exercise of discretionary review and further modification of the Project. The Project has been carefully designed to address the concerns raised by the DR Requestor as to access to light and air, and all necessary measures will be taken to safely reduce construction impacts. Because the DR Requestor has not established any exceptional or extraordinary circumstances, we respectfully ask that the Planning Commission deny the request for discretionary review and approve the Project as proposed. Thank you for your consideration.

Very truly yours,

REUBEN, JUNIUS & ROSE, LLP

Mark Loper

Enclosures

A - Site Mitigation Plan, 1088 Howard, PII Environmental
B - Site Mitigation Plan Approval, 1088 Howard, SF Department of Public Health

Exhibit A

SITE MITIGATION PLAN

1088 Howard Street
San Francisco, California 94103

Prepared for:
1088 Howard Street LLC
c/o Mr. Jonathan Moftakh
Vanguard Properties
2501 Mission Street
San Francisco, California 94110

Prepared by:
PII Environmental
Oakland, California

Reviewed By:

REGISTERED GEOLOGIST
DAVID R. DEMENT
NO. 5874
STATE OF CALIFORNIA

David DeMent, PG

October 14, 2019

TABLE OF CONTENTS

FIGURES

APPENDICES

1.0 INTRODUCTION

PII Environmental (PIIE) has prepared this Site Mitigation Plan (SMP) to describe recommended procedures during soil removal and encapsulation activities at 1088 Howard Street, San Francisco, California (Site, Figure 1). This SMP has been prepared for review and approval by the San Francisco Department of Public Health (SFDPH) and the Site Assessment and Mitigation (SAM) Program and/or the Environmental Health Services - Hazardous Waste Unit (EHS-HWU). This SMP summarizes tasks necessary to safely mitigate potential human health issues related to excavating lead-impacted soil under currently applicable regulations.

A subsurface investigation conducted at the Site in June 2018 indicates that soil present at the Site contains elevated lead from the surface to 4.0 feet below ground surface (bgs). Components of this SMP address the mitigation of human health and environmental risks from potential physical hazards resulting from soil handling activities and summarizes tasks necessary to encapsulate lead-impacted soil onsite under the proposed mat slab foundation. This document may be used by the Contractor onsite, but specific health and safety procedures associated with its activities and implementations of this SMP are the sole responsibility of the Contractor and/or subcontractors. All personnel performing fieldwork and onsite subcontractors are expected to be familiar with and adhere to the requirements of any existing Health and Safety Plan (HSP) and this SMP.

The scope of work to be performed at the Site will consist of:

- Excavating soil materials to install the foundation and any footers;
- Excavating excess soil materials to achieve finished grade;
- Stockpiling, handling, and loading excess soil for proper offsite disposal; and
- Collecting confirmatory soil samples at the extent of excavation and analyzing the soil samples for constituents of concern (if necessary).

1.1 Description of Site

The rectangular-shaped subject property is located at 1088 Howard Street, near 7th Street, in San Francisco, California. The subject property is 50 feet east of the northeast corner of 7th and Howard Streets, on the northwest side of Howard Street. The footprint of the 4,500 square foot subject property is covered by a 2-level, 2,250 square foot building used as a retail paint store (Parcel 030) and associated parking lot (Parcel 031). PIIE understands the existing building/structure was built in 1925.

The San Francisco County Assessor's Office identifies the 2-parcel subject property as Assessor's Parcel Number (APN) 3726-030 and -031, and parcel dimensions approximate 50 feet along Howard Street by 90 feet deep. The Parcel and surrounding properties were primarily used for residential purposes prior to the 1906 earthquake and fire, and information contained in the 1913 Sanborn Fire Insurance Map® strongly suggested this area, including the subject property, burned in 1906.

1.2 Proposed Site Development

PIIE understands that proposed development requires removal of approximately 3 feet of soil and the construction of an at-grade, matte-slab foundation and a 7-story, 24 unit apartment building with approximately 24,207 total square feet. The building will have approximately 2,559 square feet of retail space at street level, 15,605 square feet of residential space, 26 bicycle spaces, a lobby, elevator, and approximately 2,565 square feet of common area. Architectural renderings are included in Appendix 1. As shown on Section A-3.3, the building foundation will be a 24-inch-thick reinforced mat slab that covers the entire footprint of the property.

Bulk excavation of excess soil is necessary to construct the building foundation and associated foundation footers. Bulk excavation would normally generate approximately 333 cubic yards of excess soil; however, PIIE understands that due to the slope of the lot, the final volume of excess soil will be 150 cubic yards or less. Excavation to approximately 4.0 feet bgs will be performed at the location of the proposed elevator (Figure 2).

1.3 Site Conditions

Surface topography at the Site is relatively flat with a small slope down to the northeast. The asphalt pavement in the parking lot is approximately 3 to 4 inches thick. Fill materials were observed in soil in soil borings B1 through B4 to the total depth 4 feet bgs. The fill materials consisted of primarily of brick fragments with lesser amounts of burnt wood, ash, and debris. Soils in each soil boring consisted primarily of homogeneous, unconsolidated, fine to medium grain, well sorted, gray to reddish brown sand to 3.5 feet bgs, and light brown to yellow brown sand from 3.5 to 4.0 feet bgs. Generally, the observed soils were similar in all four soil borings to the depth of investigation. No field indications of impact were noted in soils in the four soil borings, such as odors, apparent discoloration, or measurable readings with a photoionization detector (PID). Groundwater was not encountered during this investigation and the depth to groundwater has been estimated at 15 feet bgs.

1.4 Site History

File review, documented site history, and field observations indicate that no recognized environmental concerns are present at the subject property. Former site use includes: 1) an ornamental iron company 1925-1930; 2) a soda fountain company 1935-1953; 3) a sausage company in 1958; 4) a refrigerator company 1958-1971; 5) a heating and air conditioning company 1977; and 6) a retail paint company 1990-2016.

1.5 Previous Subsurface Investigation

On July 19, 2019, PIIE advanced four exploratory soil borings B1 through B4 at select locations using a track-mounted, mobile access Geoprobe rig. Each soil boring was explored with a utility probe to 4 feet bgs and a permit was not necessary to perform this scope of work. Soil borings B1 through B4 were advanced in accessible representative locations across the Site. Soil boring B1 was advanced in the northwest area of the property, soil boring B2 was advanced immediately adjacent to the proposed elevator and central

portion of the Site, soil boring B3 was advanced in the southeast central portion of the building, and soil boring B4 was advanced in the southern corner of the property (Figure 2).

Each continuously cored boring was advanced using one four-foot long, hydraulically driven, track-mounted, limited-access Geoprobe® and sampling core barrel equipped with a 2-inch inside-diameter clear acetate liner. Each recovered soil core was visually inspected and logged. The sample intervals were logged to determine soil type and evaluate field indications of impact at that soil boring location. Field indications of impact include: characteristic odor, apparent discoloration, elevated photoionization detector (PID) readings, and presence of fill materials. No indications of contamination were noted in the field. Soils in soil borings B1 through B4 were logged and classified during drilling operations according to the Unified Soil Classification System (USCS). Lithologic logs are included in Appendix 2.

Representative soil samples were obtained in soil borings B1 through B4, composited by the laboratory, and selectively analyzed for TEPH as diesel and motor oil-range petroleum hydrocarbons by EPA Method 8015B, CAM 17 metals by EPA Method 6010B, and SVOCs by EPA Method 8270C. TEPH analytical results are summarized in Table 1 and CAM17 metal analytical results are summarized in Table 2.

TEPH concentrations were reported in the two composite soil samples collected at 0.5-1.0 foot bgs and 2.5 to 3.0 feet bgs. Lead, antimony, barium, and zinc (metals commonly used in paint) were elevated in the composite soil sample collected at 2.5-3.0 feet bgs which was significantly more representative of the soil containing earthquake fill materials. Soluble lead by STLC and TCLP methodology demonstrates that soil to approximately 4.0 feet bgs qualifies as California hazardous soil and non-hazardous Federal RCRA soil.

With the exception of one detection, no SVOC concentrations were reported above their respective laboratory reporting limit in the two analyzed composite soil samples. Pyrene was reported at 0.098 mg/kg in COMP 5-8 at 3.0 feet bgs.

TABLE 1 – TEPH ANALYTICAL RESULTS

Sample ID	Depth	TEPH as Diesel (mg/kg)	TEPH as Motor Oil (mg/kg)
COMP 1-4	0.5-1.0	72[Y]	300
COMP 5-8	2.5-3.0	29[Y]	200
Residential ESL		230	5,100

Note: = Y = Chromatographic pattern does not resemble standard (likely represents weathered hydrocarbons)

TABLE 2 - CAM 17 METAL ANALYTICAL RESULTS

Constituent	COMP 1-4@0.5' (mg/kg)	COMP 5-8@3' (mg/kg)	San Francisco Average*
Antimony	<1.9	15	<1
Arsenic	3.3	5.1	10
Barium	130	470	1,000
Beryllium	0.30	0.36	<1
Cadmium	0.43	0.62	---
Chromium	25	41	100-700
Cobalt	10	7.1	10-70
Copper	35	110	30-150
Lead	87	5,600	30-300
Mercury	0.36	0.27	0.2-1.3
Molybdenum	0.71	0.61	<3
Nickel	38	47	20-70
Selenium	<1.9	<1.9	0.1
Silver	<0.24	0.27	---
Thallium	<0.47	<0.49	---
Vanadium	33	30	100-300
Zinc	130	820	120-190

Notes: All results are in milligrams per kilogram (mg/kg) approximately equal to parts per million (ppm)
< Not detected above laboratory reporting limit indicated
** According to United States Geologic Survey Professional Paper 1270*

1.6 Soil Remediation

Remedial soil excavation is not being proposed during bulk excavation; however offsite disposal of excess soil will remediate a portion of the lead-impacted soil. In the event unknown conditions, odor, or apparent soil discoloration are noted in soil at the extent of excavation, representative soil samples will be collected in those locations to characterize this soil and help evaluate the need for potential soil remediation.

Encapsulation

DPH routinely approves encapsulation of lead-impacted soil onsite. In order to remove the appropriate volume of soil necessary to construct the proposed building foundation and encapsulate lead-impacted soil beneath the mat slab, the following steps should be performed:

1. Surface soil to an approximate depth of 2.0 feet bgs containing fill materials will be moved around the property and graded as necessary;

2. The minimal volume of excess soil should be excavated and disposed offsite after being profiled using the existing soil analytical data;

3. Calculate the volume of soil lost due to soil compaction efforts to ensure that the proper minimal volume of soil has been removed to achieve final grade following backfilling without the need to use new clean backfill material; and

4. Take any and all steps necessary to fulfill the goal of successfully encapsulating lead-impacted soil onsite under the proposed mat slab foundation and dispose of excess soil in the most cost-effective manner possible.

The general intent of this work is to leave lead-impacted surface soil onsite and encapsulated under the proposed building foundation. Confirmation soil sampling at the extent of excavation is not warranted. No other constituents of concern are suspected in shallow soil.

Please note that **DPH will request that a deed restriction be recorded on the property** to document the encapsulated lead-impacted soil.

1.7 Pathways for Hazardous Substance Dispersion

The potential exists for lead in soil to be dispersed from the soil through particulates in air during soil excavation and loading activities or by carrying “dust” off the Site by personnel or equipment. Dispersion by air shall be controlled by using “dust” control measures, enforcing site control measures, and erecting perimeter access control such as fencing, barricades, or caution tape. Soil particulates may also be ingested through hand to mouth contact, poor personal hygiene, and inadvertently ingesting soil by drinking, eating, or smoking.

Air monitoring and Best Management Practices will be performed to demonstrate that proper “dust” suppression eliminates or significantly reduces potential exposure via inhalation of soil particulates, and enforcing a site-specific HSP and good worker hygiene in the construction zone eliminates or significantly reduces potential exposure via inhalation or ingestion of soil particulates.

1.8 Health and Safety Plan and Soil Management Plan Availability

Any site specific HSP and this SMP should be available to: employees, employee designated representatives, Owners and their representatives, and personnel of federal, state, or local agencies. The HSP should specifically address the potential for exposure to lead in soil and include mitigation measures to prevent ingestion of lead. A copy of PIIE’s site-specific Health & Safety Plan is included in Appendix 3.

2.0 SOIL REMOVAL PROTOCOL AND PROCEDURES

A designated work boundary shall be established for soil excavation activities at the Site. During soil excavation activities, all exposed soil surfaces should be kept visibly moist by water spray. Transport vehicles should be loaded on pavement capable of being properly cleaned or appropriate plastic sheeting during loading activities. Air monitoring should be conducted in accordance with the HSP at the worker breathing zone and downwind of the work boundary. Since the Site is surrounded on three sides (northwest, northeast, and southwest) by existing 4-story and 5-story buildings, air monitoring will be primarily performed southeast on Howard Street in the downwind direction.

During periods of inactivity longer than 12 hours, exposed soil should be covered with minimum 10-mil plastic sheeting or other covering to minimize soil dispersion and drying. Security fencing should be locked and open excavations will be demarcated with barricades and/or caution tape tape during periods of inactivity and at the end of each workday to reduce the potential of personnel falling into the excavation. The excavation will be maintained to mitigate physical hazards to personnel working in or entering the area after soil removal is completed. Soil excavation and removal will extend to an estimated depth of 4.0 feet below original ground surface.

During excavation, any unknown subsurface equipment, including metallic vessels, oil water separators, drums, and metal piping, shall be placed on plastic sheeting for inspection by the Environmental Consultant. In the event an underground storage tank(s) (UST) is encountered, excavation will immediately cease at that location and the tank will be inspected by the Environmental Consultant. Any identified USTs should be removed under an expedited tank removal permit. In the event soil is uncovered displaying significant odor or discoloration, excavation will immediately cease at that location and the soil will be inspected by the Environmental Consultant. If the volume of suspect soil is relatively small (10 cubic yards or less), it can be removed and placed on plastic sheeting for subsequent inspection and sampling.

2.1 Noise

Consistent with City of San Francisco construction noise ordinances, all work will be performed between 7 AM and 7 PM, Monday through Friday. Any work performed on Saturday or Sunday will be performed between 9 AM and 5 PM. Any work producing noise greater than 75 decibels, such as jack hammering, should be performed between 9 AM and 5 PM only.

2.2 Soil Particulates (Dust)

As specified in Construction Dust Control Ordinance 176-08, recently codified as San Francisco Health Code Articles 22B, all site preparation work, demolition, or other construction activities that have the potential to create dust or will expose or disturb more than 10 cubic yards or 500 square feet of soil must comply with specified dust control measures whether or not the activity requires a permit from the Department of Building

Inspection. The intent of this ordinance is to reduce the quantity of dust generated during site preparation, construction and demolition in order to protect the the health of the general public, protect the health of on-site workers, minimize public nuisance complaints, and avoid orders to stop work by the Department of Building Inspection or SFDPH.

Provisions summarized below constitute a Dust Control Plan as required by Article 22B:

- Concrete being prepared for demolition will be watered as necessary to avoid creating visible dust **at all times**;

- All active construction areas will be watered no less than three times per shift per day to eliminate visible dust **at all times**;

- Additional watering will be performed whenever wind speed exceeds 15 miles per hour, and two or more streamers will be placed in visible locations to estimate / confirm approximate wind direction and speed;

- Watering should moisten soil only and no water runoff should be produced at any time;

- At the end of each work day, all streets, sidewalks, paths, and intersections where work occurrred will be wet sweeped or vacuumed to remove visible soil;

- Cover any inactive soil piles (soil not expected to be disturbed for more than seven days) with 10 mil (0.01 inch) plastic sheeting or equivalent tarp and braced down to avoid drying and wind damage;

- One portable, hand-held Extech VPC300 Particle Counter (or equivalent Particulate Dust Monitor) will be used to monitor particulates in air along Howard Street, and data reviewed for purposes of determining background and/or dust levels in wind entering and leaving the subject Site;

- **Action levels** are particulates greater than 250 mg/m^3 over a 5 minute period and an average particulate level greater than 50 mg/m^3 over a 24 hour period, however **all soil excavation is anticipated to be performed in one to two 8-hour days**;

- Signage will be placed on Howard Street to inform surrounding community members of the hotline phone number(s) to call and report visible dust problems;

- All loading trucks or metal bins carrying excavated material will be below the sides and back of the truck or bin, and loaded soils will be properly covered to avoid dust and soil drying during transport; excavated materials must be moistened prior to transport;

- Truck tires will be brushed prior to leaving the Site and the truck loading area on Howard Street will be routinely swept (2X per day) and cleaned to avoid creating visible dust; and

- Terminate soil handling activities when the wind speed exceeds 25 miles per hour, or visible dust is being created that cannot be mitigated by soil moistening.

Instrumentation and Methodology

The Extech VPC300 simultaneously displays particle sizes of 10 microns, 5 microns, 2.5 microns, 1.0 micron, and 0.5 micron, and is a superior instrument to differentiating background particulates in air entering the Site from "dust" that may be created during construction and soil handling activities.

Particulate Monitoring

The VPC300 Particle Counter (or equivalent) should be used in two ways: 1) to confirm background particulate (dust) concentrations in air along Howard Street; and 2) to obtain particulate concentrations at the exit gate to the Site on Howard Street and the downwind corner of the property during normal activities to document actual particulate levels leaving the Site and ensure dust suppression is adequate. Optimum air monitor locations are shown on Figure 3.

General Contractor:	Transatlantic Contruction
Onsite Project Manager:	Mr. Leo Cassidy
Office Contact Number:	TBD
Mobile Contact Number:	415-244-1202
Excavation Contractor:	Transatlantic Contruction
Contractor Phone Number:	415-244-1202
Environmental Consultant:	PIIE, David DeMent
Mobile Contact Number:	510-520-2372

Specific measures will be implemented by the Excavation Contractor based on previous experience handling similar lead-impacted soils in San Francisco.

CONTRACTOR SPECIFIC MEASURES

During grading, excavation, and compacting activities, misted water may be used to minimize fugitive particulate emissions. Stockpiled spoils should be moistened and covered until they are disposed.

During work operations, water will be used to wet down the area that is being excavated. During the excavation process, water spray should be used to minimize any fugitive particulate emissions. The ground will be sprayed with to minimize fugitive particulate emissions from haul trucks and excavation equipment. Water will be obtained from onsite

or from the closest fire hydrant. During the loading of the trucks with excavation debris, a water spray will be used to minimize fugitive particulate emissions. The trucks will have tarpaulins installed to cover their loads prior to leaving the site to ensure there are no particulate emissions occur while the trucks are in transit.

CONTRACTOR PROCEDURES TO MINIMIZE FUGITIVE PARTICULATE EMISSIONS

a) Water sprays will be used to minimize fugitive particulate emissions during active excavation, stockpiling, and loading material.
b) A supervisor will monitor the excavation process and ensure that water sprays are turned on as required to minimize fugitive particulate matter emissions.
c) A log of the dates and times the water sprays are turned on and off will be maintained, or water will be applied on a scheduled basis at least four times per shift.
d) Water sprays will be used to minimize potential fugitive particulate emissions from the removal of any encountered concrete.
e) A supervisor will monitor the removal of any concrete and ensure that the water sprays are turned on as required to minimize fugitive particulate emissions.
f) A log of the dates and times the water sprays are turned on and off for encountered concrete should be maintained.
g) Water sprays will be used to suppress the dust and minimize fugitive particulate emission from the movement of haul trucks and excavation equipment.
h) A supervisor will monitor the movement of haul trucks and excavation equipment and ensure that either a water truck or water sprays are used as required to minimize fugitive particulate emissions.
i) A log will be maintained of the dates and times the water sprays are turned on and off or the water truck is used.
j) Tarpaulins will be fitted to trucks hauling excavation debris off site, to minimize potential fugitive particulate emissions.
k) A supervisor will ensure that all haul trucks leaving the site with excavation debris will be fitted with a tarpaulin to minimize fugitive particulate emissions.

3.0 MANAGEMENT OF EXCAVATED SOIL

The Environmental Consultant will observe initial soil excavation activities to help ensure worker safety, compliance with this SMP, document all pertinent soil removal efforts, and collect confirmation samples at the extent of excavation to document remaining soil conditions according to SFDPH requirements.

As necessary, excavated soil will be stockpiled and covered with heavy duty plastic sheeting, 10-mil or thicker. When not covered, soil stockpile surfaces will be kept visibly moist by water spray. Stockpiled soil will then be loaded into transport vehicles for offsite disposal. Transport vehicles will be covered with plastic sheeting or tarp during transportation. Heavy duty plastic sheeting will be placed on the ground at the loading site to prevent transport vehicle tires from contacting contaminated soil and to minimize suspect lead-impacted soil falling off the transport vehicle during loading and contacting

bare soil. As necessary, transport vehicle tires should be swept prior to departure to prevent contaminated soil from leaving the loading site.

3.1 Specific Soil Handling & Stockpiling Tasks

Based on site observations, feasibility in the field, and upon the direction of the Environmental Consultant, the Excavation Contractor shall:

- Segregate and stockpile any soils displaying field indications of impact (odor, discoloration, and fill materials), moisten the material to control dust, and covering with plastic sheeting to minimize soil drying pending loading for offsite transport; if there is any question as to the appropriate manner to stockpile this material, consult the Environmental Consultant;

- To the extent feasible, remove any foreign materials that can be cost effectively recycled or disposed at an accepting landfill, such as concrete, brick, asphalt, wood, and metal and place in a separate location;

- To the extent feasible, minimize drop heights while loading soil transportation vehicles; and

- Stockpiled soils should be watered and covered with plastic sheeting at the end of each business day.

3.2 Confirmation Soil Sampling

Following excavation to the desired depth, any field indication of impact, if present, will be logged. Site conditions at the limits of excavation will be photo-documented. Based on previous soil characterization, confirmation soil samples are not warranted unless new unknown concerns are uncovered during excavation. If indications of unknown impact are discovered, appropriate soil samples will be collected at the extent of excavation in the location of concern and analyzed for likely constituents of concern. The purpose of any soil sampling will be to further characterize remaining soil following excavation and determine if remedial soil removal is warranted.

If any unknown tanks, sumps, drains, vaults or soils displaying field indications of impact are located during excavation, PIIE will be contacted for inspection. If no liquids, obvious soil staining, or obvious odor are noted, the identified structure will be demolished and disposed. If liquid is present within the structure, or obvious odor or soil staining is noted, PIIE may sample affected media to determine appropriate disposal and document the incident. If stained or odorous soil is encountered and PIIE cannot inspect that business day, the area should be covered with plastic sheeting until it can be inspected and/or sampled.

3.3 Confirmation Water Sampling

Dewatering will not be required during excavation.

3.4 Closure Report

Upon completion of excavation and site mitigation activities, a summary closure report will be prepared for SFDPH. The closure report will summarize excavation and appropriate construction activities, all mitigation activities performed at the Site, air monitoring results, any analytical results, and material disposal documentation. The report will certify that mitigation measures summarized in this SMP were properly performed by the General and Excavation Contractors.

4.0 MANAGEMENT OF REMOVED GROUNDWATER

Dewatering will not be required at this Site.

5.0 BEST MANAGEMENT PRACTICES

Best Management Practices (BMPs) are management practices, operating procedures, or schedules of activities to control, reduce, or prevent discharge of pollutants from construction activities.

Soil removal activities will include the following BMPs:

- Material or products will be stored in manufacturer's original containers;
- Storage areas will be neat and orderly to facilitate inspection;
- Check all equipment for leaks and repair leaking equipment promptly;
- Perform maintenance, repairs, and washing of equipment away from the excavation area;
- Designate a completely contained area away from storm drains for refueling and/or maintenance work that must be performed at the site;
- Clean up all spills and leaks using dry methods;
- Wet sweep dirt from paved surfaces for general cleanup at least twice per day;
- Avoid creating excess dust when removing concrete or other buried items;
- Prevent dust from entering waterways;
- Protect storm drains using earth dikes, straw bales, sand bags, absorbent socks, or other controls to divert or trap and filter runoff;
- Schedule soil removal work for dry weather periods when possible;
- Avoid over-application by water trucks for dust control; and
- Cover stockpiles and other construction materials with heavy duty plastic. Protect from rainfall and prevent runoff with heavy duty plastic and berms.

6.0 INFORMATIONAL PROGRAMS

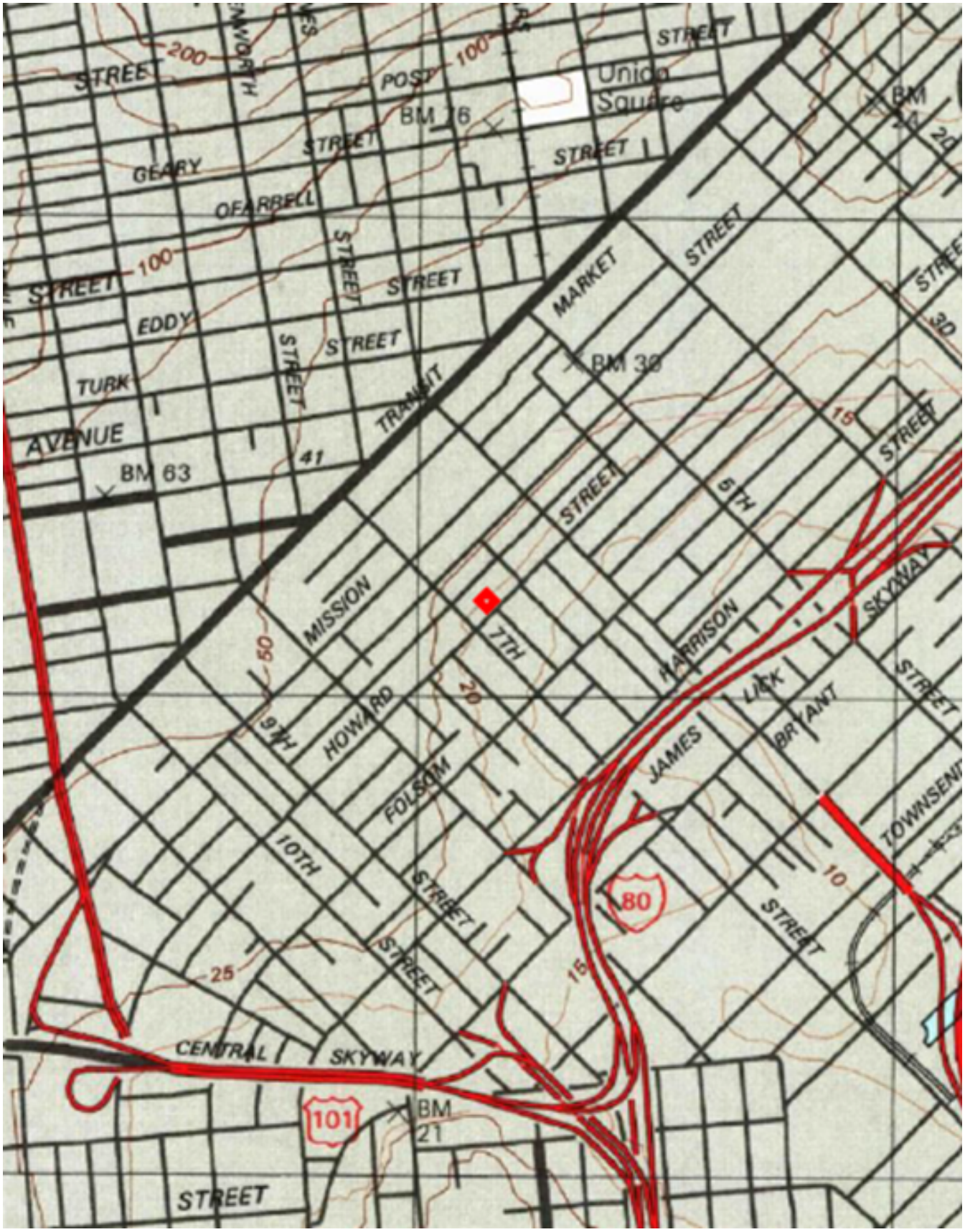
The Contractor shall inform employees and any subcontractors (and/or their representatives) actually engaged in hazardous waste operations of the nature, level, and degree of exposure likely as a result of participation in such hazardous waste operations onsite. Any information concerning the chemical, physical, and toxicological properties of each substance known or expected to be present onsite that is available to the employer and relevant to the duties an employee is expected to perform shall be made available to the affected employees prior to the commencement of their work activities.

The company's Injury and Illness Prevention (IIP) and Hazard Communication Programs shall be available onsite. Employees, contractors, and subcontractors shall also be informed and shall share information on chemical hazards at the site, as required by the Hazard Communication standard. Material Safety Data Sheets (MSDS) for all hazardous materials used on site shall be made readily available to site personnel. Employees, contractors, and subcontractors working outside of the operations part of a site shall only be notified of chemical hazards as required by the Hazard Communication standard.

A site specific Health & Safety Plan (HSP) will be prepared and maintained onsite at all times during construction activities. Because the HSP needs to be prepared for Site operations by the selected construction contractor, this SMP does not specify the health and safety and worker protection protocols, only the general requirements of the HSP. The minimum requirements for the selected contractor's HSP, prepared by a competent professional, are listed below:

General information about the Site and objectives of the work that the HSP cover;
The name of the individual(s) preparing the HSP;
A brief summary of the possible hazards associated with soil conditions at the Site;
Key personnel/Health and Safety Responsibilities;
Information on Site background including a brief description of the types of construction activities that will be conducted at the Site, and identify the types of contaminants based on review of the existing Site data;
Job hazard analysis/hazard mitigation;
Air monitoring procedures, excluding air monitoring for airborne particulate matter;
Personal protective equipment ("PPE");
Work zones and Site security measures;
Decontamination measures;
General safe work practices; and
Contingency Plans/Emergency Information.

FIGURES

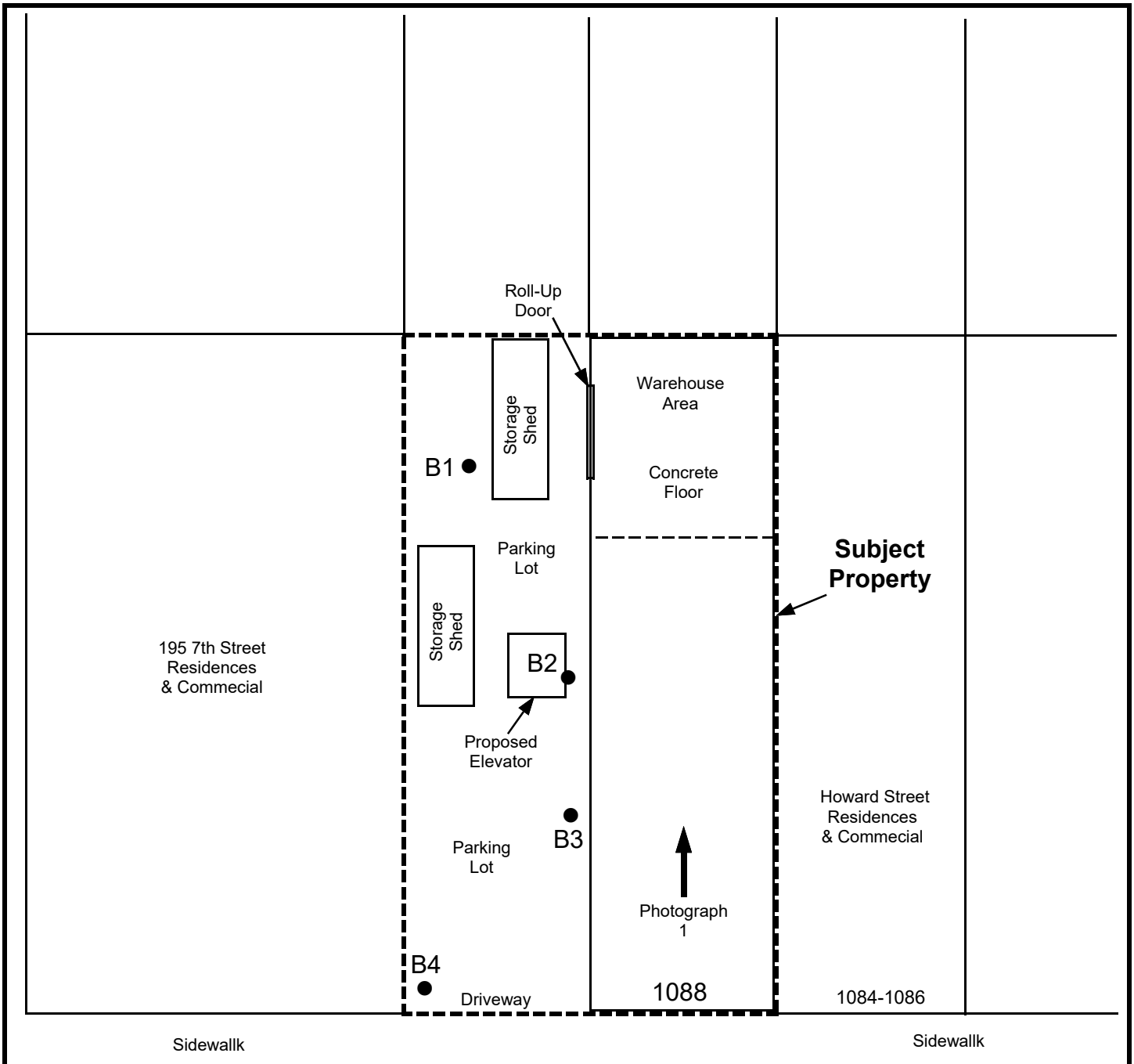


N

Scale 1:24,000

Location Map 1088 Howard Street, San Francisco Source: Historical Topographic Map, 1995	Figure 1

PII Environmental



7th Street

Howard Street

0' 20'

Scale 1" = 20'

LEGEND

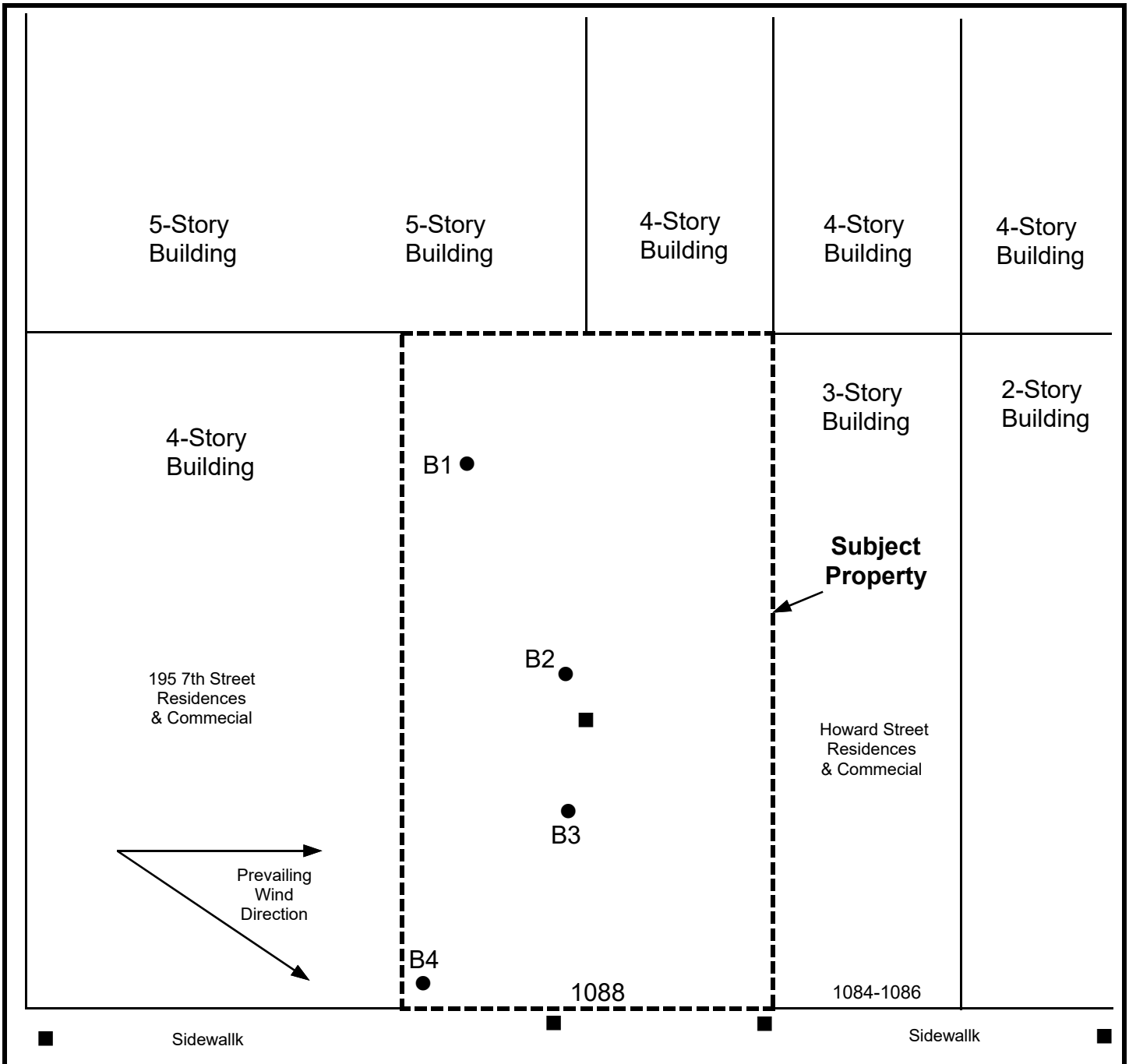
B1 ● Soil Boring Location (PIIE July 2019)

N

Site Plan
1088 Howard Street, San Francisco
Source: PIIE Site Visit, 7-5-19

Figure 2

PII Environmental



LEGEND

B1 ● Soil Boring Location (PIIE July 2019)

■ Air Monitoring Location

N

Air Monitoring Plan	Figure
1088 Howard Street, San Francisco	3
Source: PIIE Site Visit, 7-5-19	

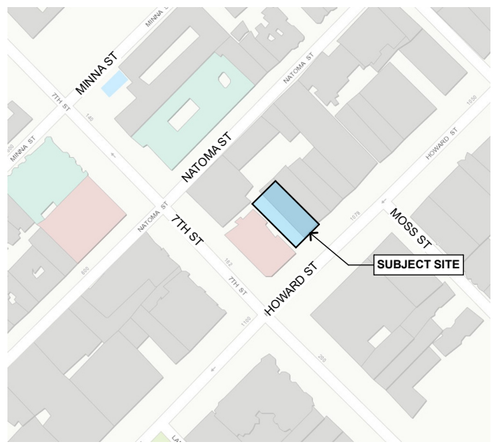
PII Environmental

APPENDICES

APPENDIX 1

SHEET INDEX

VICINITY MAP



EXISTING PROPERTY INFORMATION	
ADDRESS	1088 HOWARD ST
BLOCK / LOT	3726 / 030 & 031
LOT WIDTH x DEPTH	50.00' X 90.125'
LOT AREA	±4,506 S.F.
EXISTING HEIGHT	± 20'-9"
EXISTING CONSTRUCTION DATE	1925
# OF RESIDENTIAL UNITS	0
# OF RETAIL SPACES	1

PROPOSED PROJECT INFORMATION	
# OF RESIDENTIAL UNITS	24 (3 B.M.R.)
# OF BEDROOMS	2 BEDROOMS = 24 UNITS
	TOTAL BEDROOMS = 48
BUILDING HEIGHT	70'-2"
REAR YARD	1,127 S.F. (25%) PER §134(f)

ZONING INFORMATION	
ZONING	MUG
HEIGHT LIMIT	85-X
AREA PLAN	EASTERN NEIGHBORHOODS
RESIDENTIAL DENSITY	NO LIMIT §124, 207.5, 208
REAR YARD REQUIREMENT	MODIFICATION PER §134(f)

OPEN SPACE REQUIREMENT PER TABLE §135(B):		
	REQUIRED	PROPOSED
RESIDENTIAL	80 S.F. PER UNIT 24 UNITS = 1920 S.F.	PRIVATE: #203: 515 S.F. #204: 226 S.F. #302: 145 S.F. = 885 S.F. TOTAL
		COMMON: 21 UNITS = 1,680 S.F. 1,680 S.F. PROVIDED = 2,565 TOTAL

OFF-STREET PARKING REQUIREMENT PER § 151, 161(g):		
	REQUIRED	PROPOSED
RESIDENTIAL	NONE, PERMITTED UP TO 1 CAR PER 4 UNITS	0
RETAIL	NONE	0

BICYCLE PARKING REQUIREMENT PER §155.2:		
	REQUIRED	PROPOSED
RESIDENTIAL	24 (CLASS 1)	24 (CLASS 1)
RETAIL	2 (CLASS 2)	2 (CLASS 2)

S|L|A
SCHAUB LY ARCHITECTS

SCHAUB LY ARCHITECTS INC.
1360 9TH AVENUE, SUITE 210
SAN FRANCISCO CA 94122
415·682·8060

MIXED-USE ADDITION
1088 HOWARD STREET

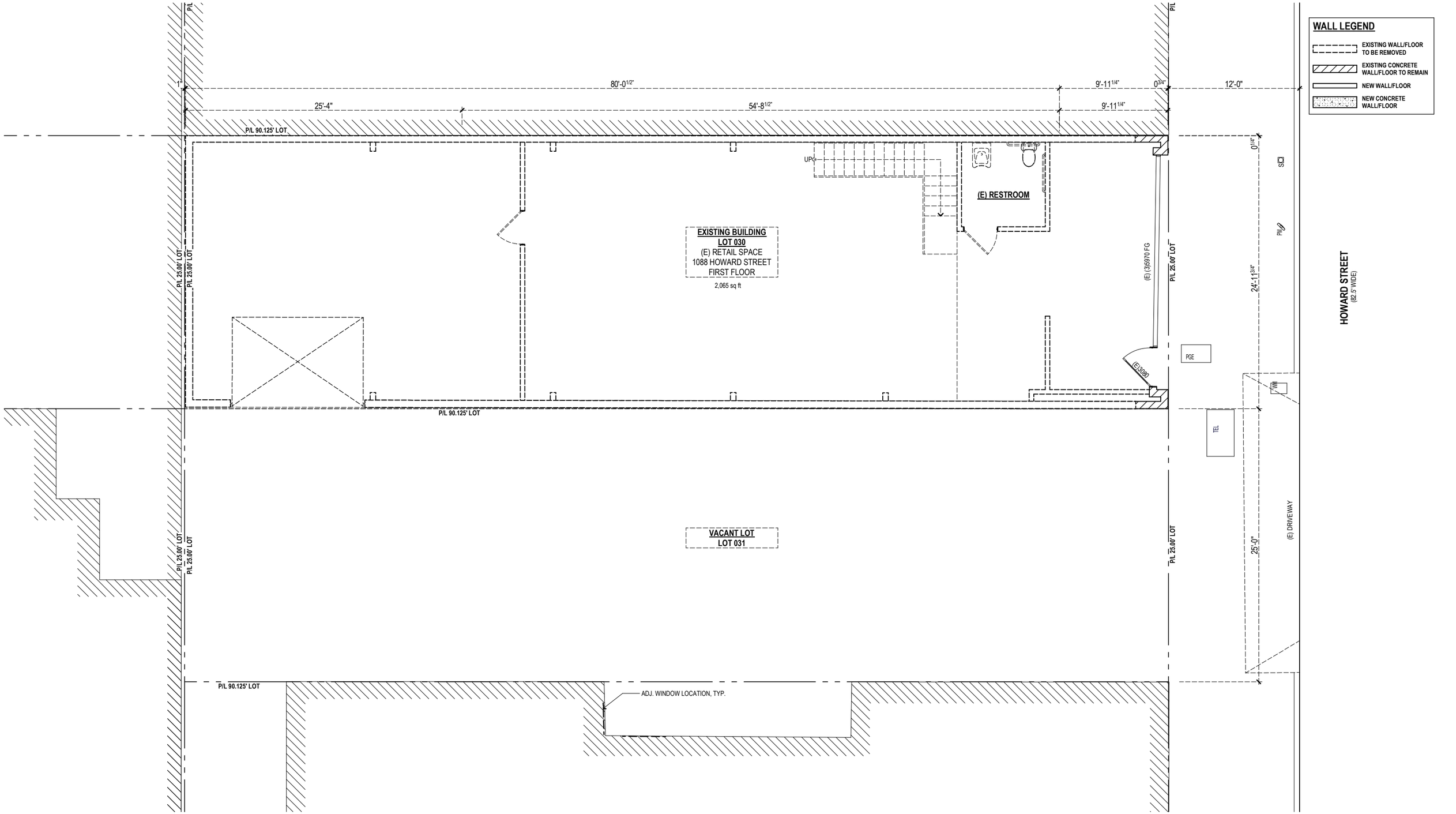
BLOCK 3726, LOT 030 & 031
1088 HOWARD STREET, SAN FRANCISCO, CA 94103

RENDERING & PROJECT INFORMATION

SCALE: N.T.S.

1/22/19 NOPDR	YIP
1/30/19 DECK	JS
4/18/19 FLOOR PLAN	JS
5/7/19 BAYS	JS
5/22/19 WINDOWS	JS
6/13/19 PRESERVATION	JS

A-0



SCHAUB LY ARCHITECTS

SCHAUB LY ARCHITECTS INC.
1360 9TH AVENUE, SUITE 210
SAN FRANCISCO CA 94122
415·682·8060

MIXED-USE ADDITION
1088 HOWARD STREET

BLOCK 3726, LOT 030 & 031
1088 HOWARD STREET, SAN FRANCISCO, CA 94103

EXISTING FIRST FLOOR PLAN

SCALE: 1/8" = 1'-0"

1/22/19 NOPDR	YIP
1/30/19 DECK	JS
4/18/19 FLOOR PLAN	JS
5/7/19 BAYS	JS
5/22/19 WINDOWS	JS
6/13/19 PRESERVATION	JS

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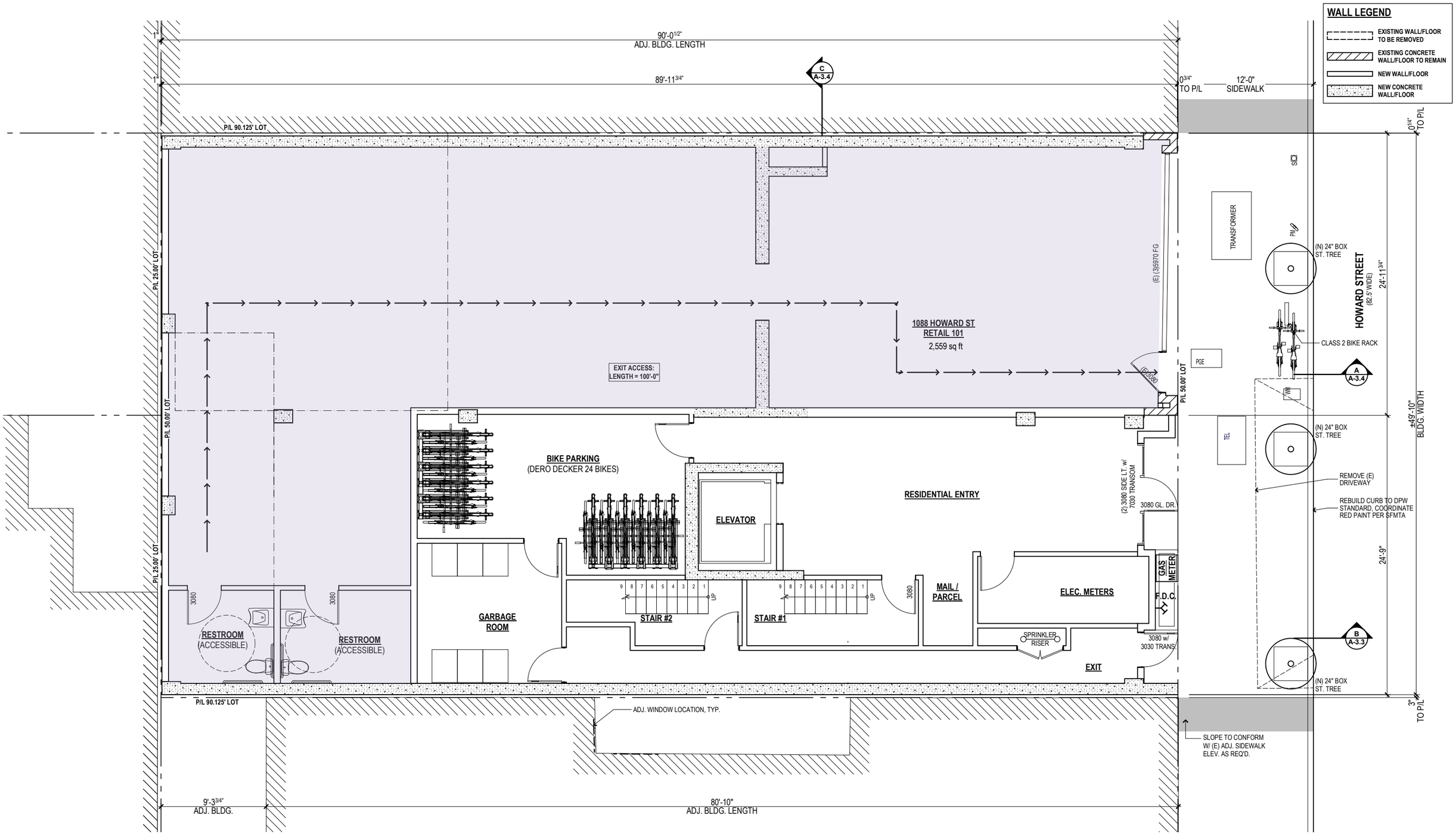


SLA
SCHAUB LY ARCHITECTS

SCHAUB LY ARCHITECTS INC.
1360 9TH AVENUE, SUITE 210
SAN FRANCISCO CA 94122
415·682·8060

MIXED-USE ADDITION
1088 HOWARD STREET

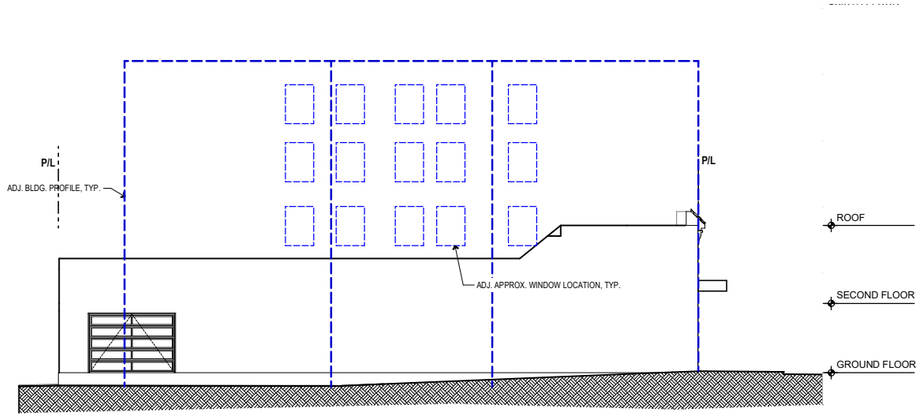
BLOCK 3726, LOT 030 & 031
1088 HOWARD STREET, SAN FRANCISCO, CA 94103

PROPOSED FIRST FLOOR PLAN

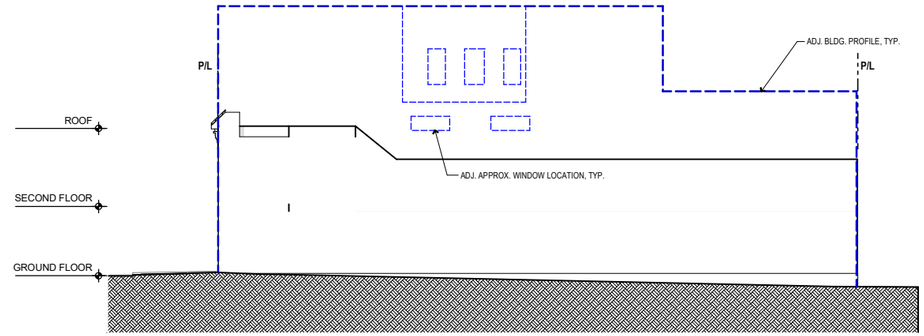
SCALE: 1/8" = 1'-0"

1/22/19 NOPDR	YIP
1/30/19 DECK	JS
4/18/19 FLOOR PLAN	JS
5/7/19 BAYS	JS
5/22/19 WINDOWS	JS
6/13/19 PRESERVATION	JS

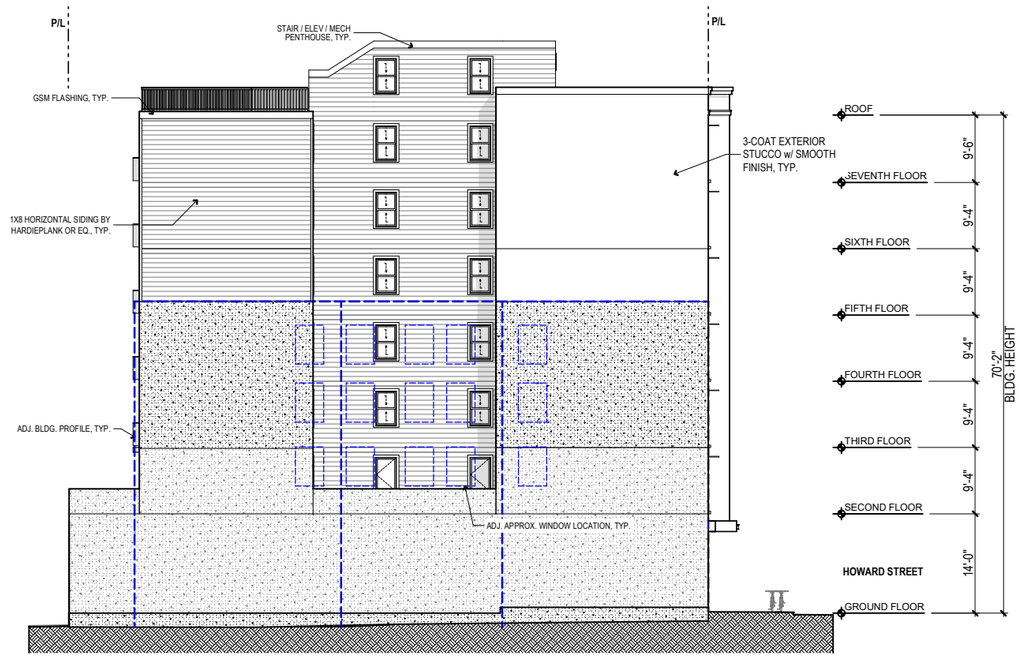
A-2.0



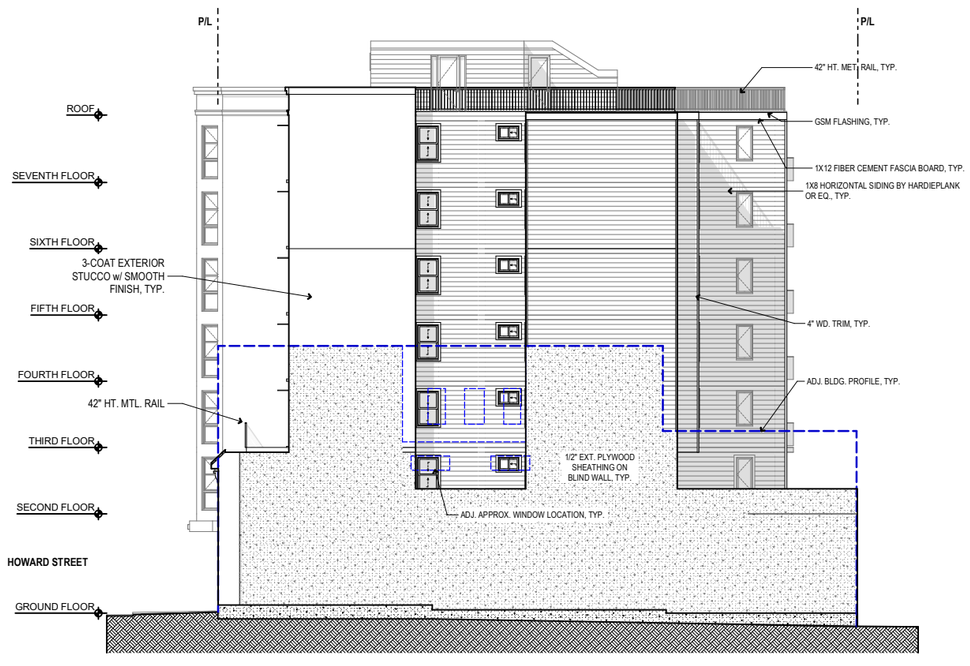
EXISTING LEFT ELEVATION



EXISTING RIGHT ELEVATION



PROPOSED LEFT ELEVATION



PROPOSED RIGHT ELEVATION

SCHAUB LY ARCHITECTS INC.
1360 9TH AVENUE, SUITE 210
SAN FRANCISCO CA 94122
415·682·8060

MIXED-USE ADDITION
1088 HOWARD STREET

BLOCK 3726, LOT 030 & 031
1088 HOWARD STREET, SAN FRANCISCO, CA 94103

EXISTING & PROPOSED SIDE ELEVATIONS

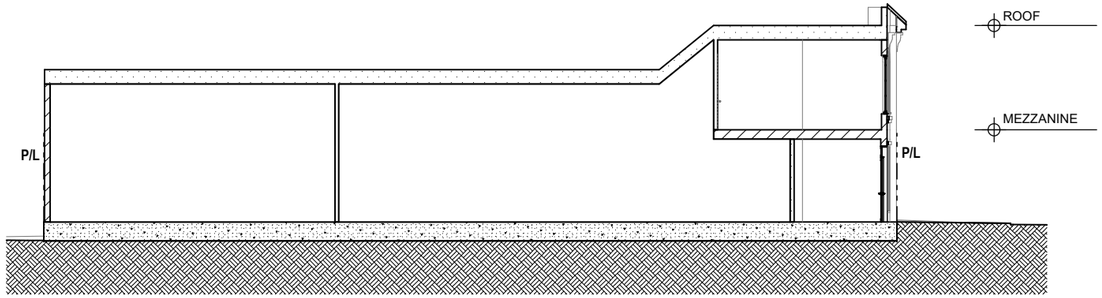
SCALE: 3/64" = 1'-0"

1/22/19 NOPDR	YIP
1/30/19 DECK	JS
4/18/19 FLOOR PLAN	JS
5/7/19 BAYS	JS
5/22/19 WINDOWS	JS
6/13/19 PRESERVATION	JS

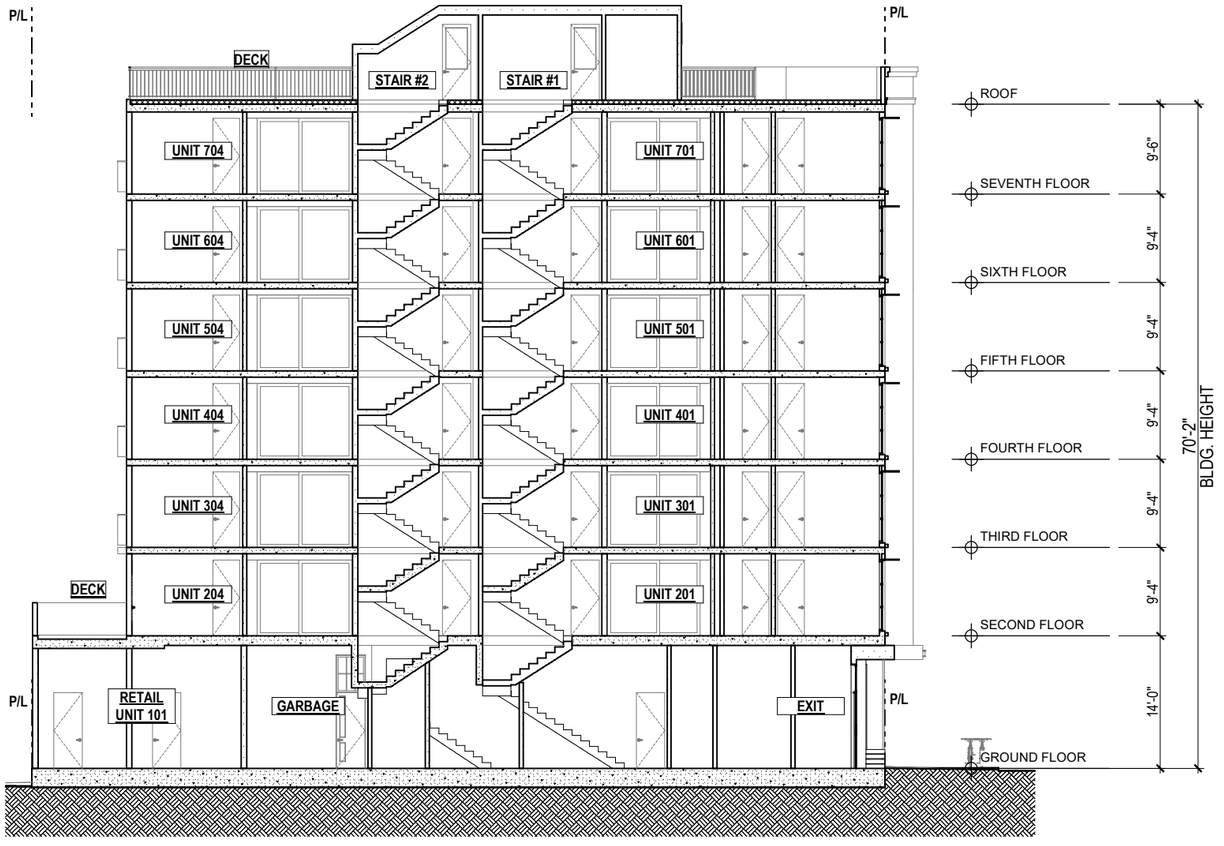
A-3.2

WALL LEGEND

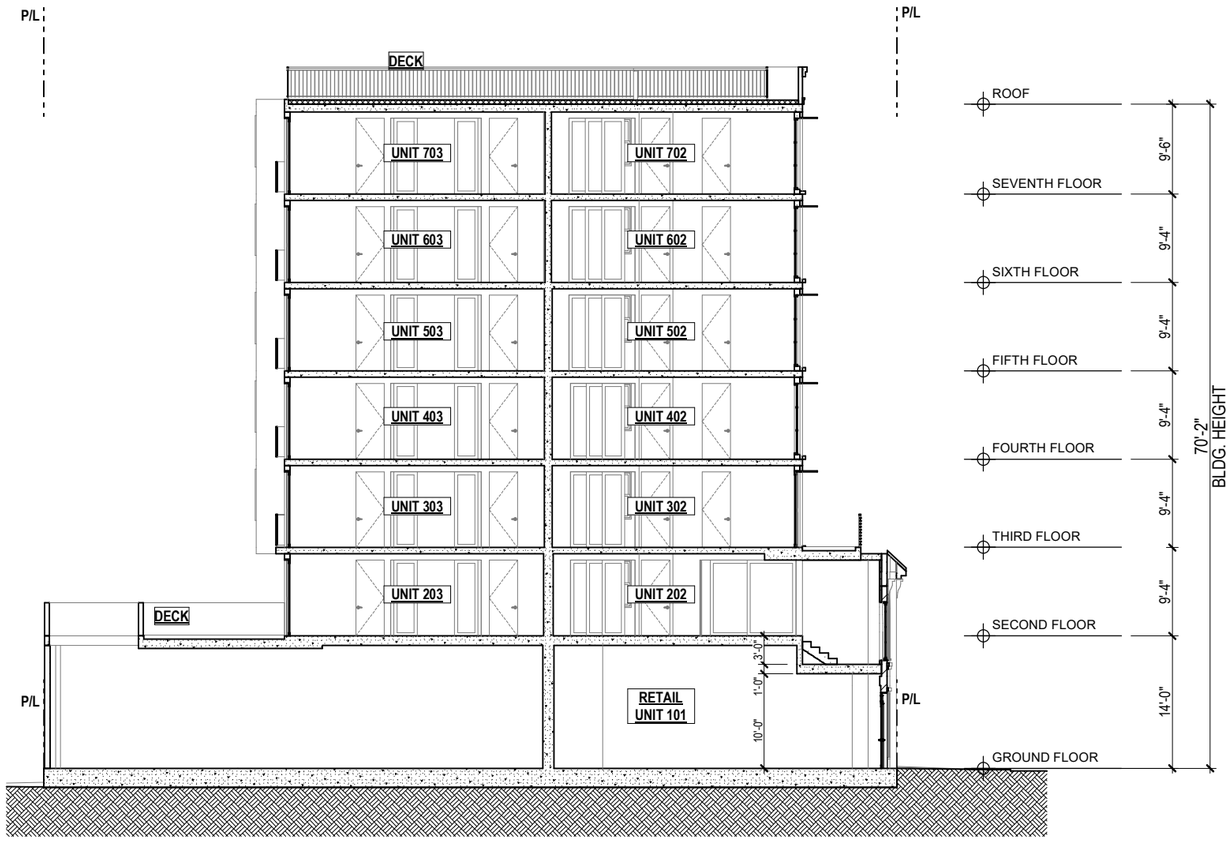
- EXISTING WALL/FLOOR TO BE REMOVED
- EXISTING CONCRETE WALL/FLOOR TO REMAIN
- NEW WALL/FLOOR
- NEW CONCRETE WALL/FLOOR



EXISTING LONGITUDINAL SECTION A



PROPOSED LONGITUDINAL SECTION B



PROPOSED LONGITUDINAL SECTION A

SLA
SCHAUB LY ARCHITECTS

SCHAUB LY ARCHITECTS INC.
1360 9TH AVENUE, SUITE 210
SAN FRANCISCO CA 94122
415·682·8060

MIXED-USE ADDITION
1088 HOWARD STREET

BLOCK 3726, LOT 030 & 031
1088 HOWARD STREET, SAN FRANCISCO, CA 94103

EXISTING & PROPOSED LONGITUDINAL SECTIONS A & B

SCALE: 1/16" = 1'-0"

1/22/19 NOPDR	YIP
1/30/19 DECK	JS
4/18/19 FLOOR PLAN	JS
5/7/19 BAYS	JS
5/22/19 WINDOWS	JS
6/13/19 PRESERVATION	JS

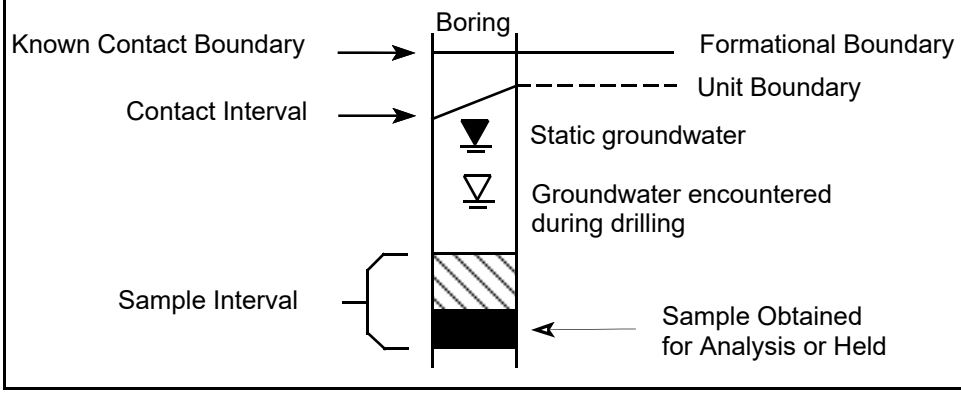
A-3.3

APPENDIX 2

UNIFIED SOIL CLASSIFICATION SYSTEM

	MAJOR DIVISIONS				TYPICAL NAMES
COARSE GRAINED SOILS	GRAVELS more than half coarse fraction is larger than Number 4 sieve	CLEAN GRAVELS WITH LITTLE OR NO FINES	GW		well graded gravels, gravel-sand mixtures
			GP		poorly graded gravels, gravel-sand mixtures
		GRAVELS WITH OVER 12% FINES	GM		silty gravels, poorly graded gravel-sand silt mixtures
			GC		clayey gravels, poorly graded gravel-sand clay mixtures
	SANDS more than half coarse fraction is smaller than Number 4 sieve	CLEAN SANDS WITH LITTLE OR NO FINES	SW		well graded sands, gravelly sands
			SP		poorly graded sands, gravelly sands
		SANDS WITH OVER 12% FINES	SM		silty sands, poorly graded sand-silt mixtures
			SC		clayey sands, poorly graded sand-clay mixtures
FINE GRAINED SOILS	SILTS AND CLAYS liquid limit less than 50		ML		inorg. silts and very fine sands, rock flour silty or clayey sands, or clayey silts w/ sl. plasticity
			CL		inorg. clays of low-med plasticity, gravelly clays, sandy clays, silty clays, lean clays
			OL		organic clays and organic silty clays of low plasticity
	SILTS AND CLAYS liquid limit greater than 50		MH		inorganic silty, micaceous or diatomacious fine sandy or silty soils, elastic silts
			CH		inorganic clays of high plasticity, fat clays
			OH		organic clays of medium to high plasticity organic silts
	HIGHLY ORGANIC SOILS		PT		peat and other highly organic soils

Legend for Boring Logs



PII Environmental
4366 Terrabella Way
Oakland, California 94619
(510) 520-2372

Site: **1088 Howard Street**
San Francisco, California

EQUIPMENT: Geoprobe Hydraulic Sampling Device
OPERATED BY: Trinity Drilling
LOGGED BY: David DeMent, PG 5874
LOCATION: 1088 Howard Street, San Francisco, CA
WORK DATE: 07/19/2019
BORING: B1

Soil Color (Munsell Soil Color Chart)	PID (ppm)	SAMPLE ID	depth below ground surface (ft)	
			0	Asphalt Pavement, 2"-3" thick with baserock
7.5YR-N3/	0	B1-1.0	2	Sand (SP), gray to reddish brown, fine to medium grain, loose-medium dense, 1-5% fines, uniform, dry to slightly damp, earthquake fill noted 1.5-3.75', brick fragments & debris, no odor or discoloration
5YR-4/4	0.1	B1-3.0	4	**TOTAL DEPTH OF BORING: 4.0 feet bgs**
			6	
			8	
			10	
			12	
			14	
			16	
			18	
			20	
			22	
			24	
			26	
			28	

PII ENVIRONMENTAL
4366 Terrabella Way
Oakland, California 94619
(510) 520-2372

Project Number **1486-01**

Date: 7/19/19

Title: **SOIL BORING B1**

1088 Howard Street
San Francisco, California

EQUIPMENT: Geoprobe Hydraulic Sampling Device
OPERATED BY: Trinity Drilling
LOGGED BY: David DeMent, PG 5874
LOCATION: 1088 Howard Street, San Francisco, CA
WORK DATE: 07/19/2019
BORING: B2

Soil Color (Munsell Soil Color Chart)	PID (ppm)	SAMPLE ID	depth below ground surface (ft)	
			0	Asphalt Pavement, 2"-3" thick with baserock
7.5YR-N3/	0	B2-1.0	2	Sand (SP), gray to reddish brown, fine to medium grain, loose-medium dense, 1-5% fines, uniform, dry to slightly damp, earthquake fill noted 1.5-3.5', brick fragments & debris, no odor or discoloration
5YR-4/4	0.1	B2-3.0	4	**TOTAL DEPTH OF BORING: 4.0 feet bgs**
			6	
			8	
			10	
			12	
			14	
			16	
			18	
			20	
			22	
			24	
			26	
			28	

PII ENVIRONMENTAL
4366 Terrabella Way
Oakland, California 94619
(510) 520-2372

Project Number **1486-01**

Date: 7/19/19

Title: **SOIL BORING B2**

1088 Howard Street
San Francisco, California

EQUIPMENT: Geoprobe Hydraulic Sampling Device
OPERATED BY: Trinity Drilling
LOGGED BY: David DeMent, PG 5874
LOCATION: 1088 Howard Street, San Francisco, CA
WORK DATE: 07/19/2019
BORING: B3

Soil Color (Munsell Soil Color Chart)	PID (ppm)	SAMPLE ID	depth below ground surface (ft)	
			0	Asphalt Pavement, 2"-3" thick with baserock
7.5YR-N3/	0	B3-1.0	2	Sand (SP), gray to dark brown, fine to medium grain, loose-medium dense, 1-5% fines, uniform, dry to slightly damp, earthquake fill noted 1.5-4.0', brick fragments & debris, no odor or discoloration
10YR-3/3	0.1	B3-3.0	4	**TOTAL DEPTH OF BORING: 4.0 feet bgs**
			6	
			8	
			10	
			12	
			14	
			16	
			18	
			20	
			22	
			24	
			26	
			28	

PII ENVIRONMENTAL
4366 Terrabella Way
Oakland, California 94619
(510) 520-2372

Project Number **1486-01**

Date: 7/19/19

Title: **SOIL BORING B3**

1088 Howard Street
San Francisco, California

EQUIPMENT: Geoprobe Hydraulic Sampling Device
OPERATED BY: Trinity Drilling
LOGGED BY: David DeMent, PG 5874
LOCATION: 1088 Howard Street, San Francisco, CA
WORK DATE: 07/19/2019
BORING: B4

Soil Color (Munsell Soil Color Chart)	PID (ppm)	SAMPLE ID	depth below ground surface (ft)	
			0	Asphalt Pavement, 2"-3" thick with baserock
7.5YR-N3/	0	B4-1.0	2	Sand (SP), gray to dark brown, fine to medium grain, loose-medium dense, 1-5% fines, uniform, dry to slightly damp, earthquake fill noted 1.7-4.0', brick fragments & debris, no odor or discoloration
10YR-3/3	0.1	B4-3.0	4	**TOTAL DEPTH OF BORING: 4.0 feet bgs**
			6	
			8	
			10	
			12	
			14	
			16	
			18	
			20	
			22	
			24	
			26	
			28	

PII ENVIRONMENTAL
4366 Terrabella Way
Oakland, California 94619
(510) 520-2372

Project Number **1486-01**

Date: 7/19/19

Title: **SOIL BORING B4**

1088 Howard Street
San Francisco, California

APPENDIX 3

PII ENVIRONMENTAL
SITE SAFETY PLAN

A. GENERAL INFORMATION

Project Title: **Soil Excavation and Sampling**
Project No.: **1496.01**

Project Manager: **David DeMent, PG**

Location: **1088 Howard Street, San Francisco, California**

Prepared by/date: **Denise Jin 10/12/19**

Approved by/date: **Dave DeMent 10/13/19**

Scope of Work/Objective(s): **Soil samples will be taken under standard COC procedures. All work will be performed under the direct supervision of a Professional Geologist.**

Proposed Date of Field Activities: **January – March 2020**

Documentation/Summary:

Overall Chemical Hazard: Serious [ ] Moderate [ ]
Low [X] Unknown [ ]

Overall Physical Hazard: Serious [ ] Moderate [ ]
Low [X] Unknown [ ]

B. SITE/WASTE CHARACTERISTICS

Waste Types(s):
Liquid [ ] Solid [X] Sludge [ ] Gas/Vapor [ ]

Characteristics:
Flammable/Ignitable [ ] Volatile [ ] Corrosive [ ] Acutely Toxic [ ]
Explosive [ ] Reactive [ ] Carcinogen [ ] Radioactive [ ]

Physical Hazards:
Overhead [ ] Confined Space [ ] Below Grade [ ] Trip/Fall [X]
Puncture [ ] Burn [ ] Cut [X] Splash [ ]
Noise [X]

Other:

Site History/Description and Unusual Features: **Former parking lot and retail store.**

Locations of Chemicals/Waste: **Minor residual lead in soil to 4.0 below grade.**

Estimated Volume of Chemicals/Waste: **Unknown, lead-impacted soil from approximately 0-4.0 feet below ground surface, estimated at 650-700 cubic yards.**

Site Currently in Operation: Yes [ ] No [X]

C. HAZARD EVALUATION

List and Evaluate Hazards By Task (e.g., sampling/drilling)

Task	Physical Hazard	Level of Protection
1	Observe/Direct Excavation	D
2	Collect Soil Samples (as needed)	D
3	Perform PID/Dust Air Monitoring	D

Chemical Hazard Evaluation:

Compound	PEL/TWA	Route of Exposure	Acute Symptoms	Odor Threshold/Desc.
Lead	**50 μg/m^3**	**inhalation, dermal, ingestion**	**Irritation of eyes, skin, nose**	**None**

D. SITE SAFETY AND WORK PLAN

Perimeter identified? [Y] Site secured? [Y] Work areas identified? [Y]
Zone(s) of contamination identified? [N], soil with highest contamination identified

Air Monitoring: **Volatiles in air, dust monitoring**
Contaminant(s) of Interest: **lead**
Type of Monitoring: **PID for volatiles, Extech VCP300 for dust in air**
Frequency: As needed, particulate monitoring is continuous
Equipment: Mini-RAE PID

Decontamination procedures and solutions: **Trisodium phosphate and water, triple rinsed**
Special Site Equipment: (Sanitary facilities, lighting, etc.) **None anticipated**
Site Entry Procedures and Special Considerations: **None**
Work Limitations (time of day, weather conditions, etc.): **None**
General Spill Control, if applicable: **N/A**

Investigation-Derived Material Disposal (expendables, cuttings, etc.): **NA**

Sample Handling Procedures: **Soil samples will be collected in new 2" by 4' polyethylene liners and sealed with Teflon sheeting and tight fitting plastic end caps.**

E. EMERGENCY INFORMATION

Ambulance **911**

Hospital Emergency Room: **(415) 206-8000**

San Francisco General Hospital, 1001 Potrero Avenue, San Francisco, California

Directions to Hospital:
Turn Right on Howard, turn left on 10th Street, merge onto I-101 south, exist at C Chavez Street, stay right and merge onto Potrero Avenue northbound, proceed 4 blocks to Potrero Avenue, HOSPITAL at 1001 Potrero Avenue.

Poison Control Center **911**
Police **911**
Fire Department **911**
Laboratory **Enthalpy Labs, Berkeley**
UPS/Fed. Express **N/A**

Client Contact: **Mr. Leo Cassidy, (415) 244-1202 (cell)**

SITE RESOURCES

Water Supply Source: Hydrant
Telephone: Cell phones
Consultant: **David DeMent, PIIE**
Cellular Phone: **(510) 520-2372**
Other:_____

EQUIPMENT CHECKLIST

Protective Gear	Quantity	Equipment	Quantity	Equipment	Quantity
Respirator	1	PID	1	Baggies	1 box
Organic Cartridges	2	Liter bottles	10	Chain of Custody Forms	1 set
Tyvek	1	Rope	100 feet	Labels	1 set
Gloves, Nitrile	1 pair	Surveyors Tape	1	Paper Towels	1 roll
Steel Toed Boots	1 pair	Camera/Film	1	Trash Bags	1
First Aid Kit	1	Cooler	1	Buckets	3
Safety Glasses	1 pair	Brass Liners	10	Brushes	2
Portable eye wash	1	Plastic End Caps	20	TSP	1 box
Ear Plugs	1 pair	Teflon Tape	1 roll	Boring Logs	1 set

SITE SAFETY REVIEW

General Information

Project: **Develop 1088 Howard Street Project, excavate for mat slab construction.**

Site: **1088 Howard Street, San Francisco, near the corner of 7th and Howard Streets.**

Client Contact: **Mr. Leo Cassidy, (415) 244-1202 (cell)**

Objectives: **Observe/direct soil excavation, collect soil samples, perform air monitoring.**

Types of Chemicals Anticipated: **None.**

Physical Hazards: **Typical Hazards associated with bulk soil excavation and soil sampling**

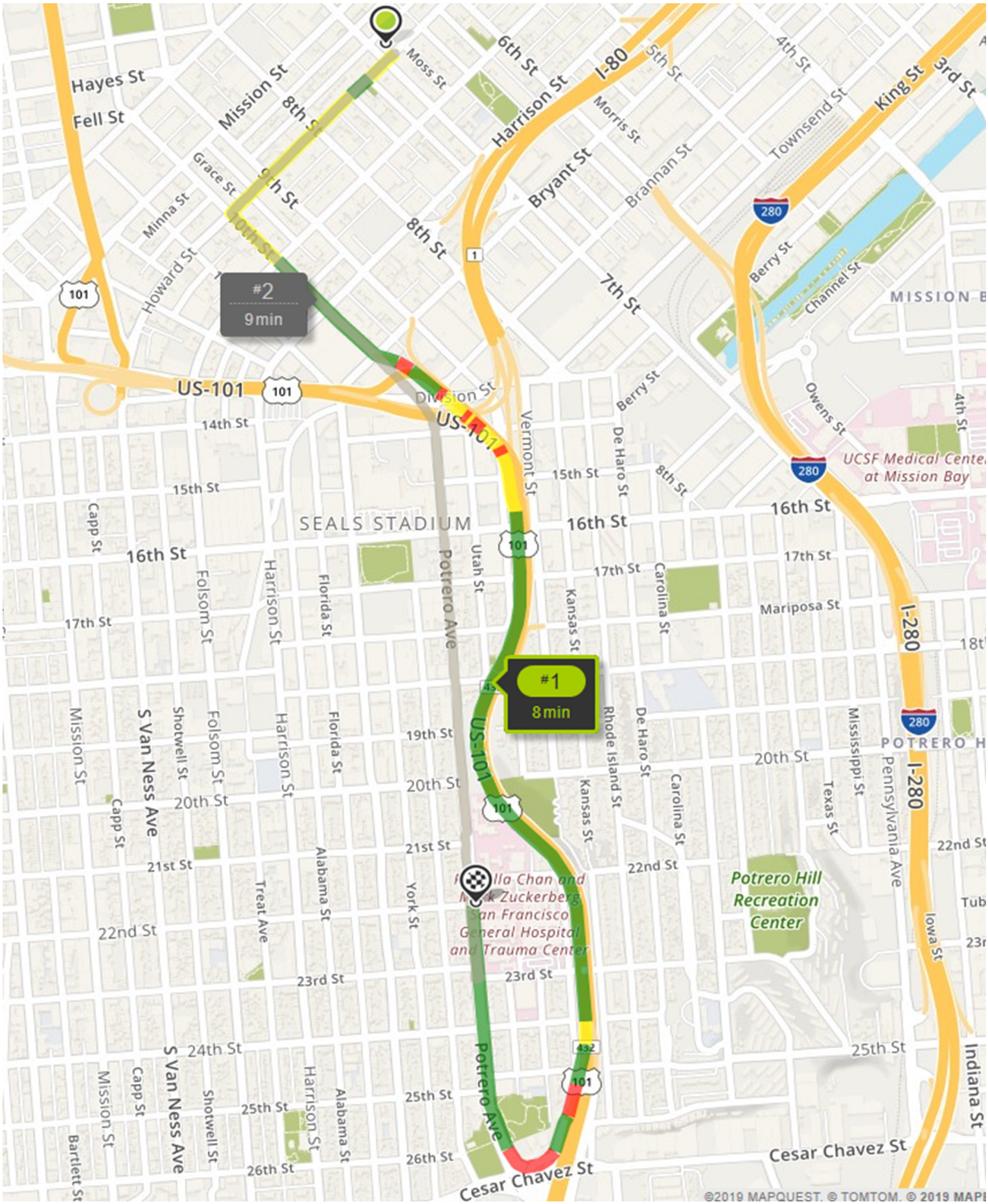
Personal Protection: **Level D, modified as required**

Decontamination: **None**

Special Site Considerations: **None**

ATTENDEES

Name Printed	Signature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8 min
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Fell St
Mission St
8th St
Moss St
6th St
Harrison St
I-80
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King St
3rd St
Townsend St
Morris St
Bryant St
Brannan St
Grace St
9th St
Minna St
10th St
Howard St
101
280
Berry St
Channel St
MISSION B
7th St
US-101
Division St
Vermont St
Berry St
De Haro St
Owens St
4th St
UCSF Medical Center at Mission Bay
14th St
15th St
8th St
16th St
SEALS STADIUM
Capp St
Folsom St
Harrison St
Florida St
Potrero Ave
Utah St
Kansas St
Carolina St
17th St
Mariposa St
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Pennsylvania Ave
POTRERO H
Texas St
Shotwell St
Mission St
S Van Ness Ave
21st St
22nd St
Treat Ave
Alabama St
York St
Potrero Hill Recreation Center
23rd St
Iowa St
Tub
23r
24th St
25th St
Indiana St
26th St
Cesar Chavez St
Bartlett St
©2019 MAPQUEST. © TOMTOM. © 2019 MAPE

Exhibit B

City and County of San Francisco
DEPARTMENT OF PUBLIC HEALTH
ENVIRONMENTAL HEALTH

London Breed, Mayor
Grant Colfax MD, Director of Health
Stephanie K.J. Cushing, MSPH, CHMM, REHS
Environmental Health Director

28 October 2019

Carland Inc
735 Montgomery Street
San Francisco, CA 94111
Email: ivyxy0316@gmail.com

Subject: **SITE MITIGATION PLAN APPROVAL**
MIXED USE DEVELOPMENT
1088 HOWARD STREET
EHB-SAM NO. SMED: 1611

Dear Ivy Ye:

In accordance with the San Francisco Health Code, Article 22A and the Building Code, Section 106A.3.2.4.1, 106A.3.2.4.2 and 106A.3.2.4.4 – Hazardous Substances; the San Francisco Department of Public Health, Environmental Health Branch, Site Assessment and Mitigation (EHB-SAM) has reviewed the following documents:

1. Phase 1 Environmental Site Assessment Report by ERA Environmental Inc. (ERAS), June 2016.
2. Preliminary Geotechnical Evaluation 1088 Howard Street, by Ninyo and Moore July 2017.
3. Drawings, 1088 Howard Street, San Francisco by Schaub Ly Architects, July 2017.
4. Phase II Work Plan – Shallow Soil Characterization by PII Environmental dated 8 July 2019.
5. Phase II Soil Characterization Report by PII Environmental dated 16 August 2019.
6. Site Mitigation Plan by PII Environmental dated October 14, 2019 by PII Environmental.

On October 30, 2017, EHB-SAM approved and / or accepted previously submitted documents listed in items 1 through 3 above. Please refer to that letter for additional information.

Site Description
The rectangular-shaped subject property is located at 1088 Howard Street, near 7th Street, in San Francisco, California. The subject property is 50 feet east of the northeast corner of 7th and Howard Streets, on the northwest side of Howard Street. The footprint of the 4,500 square foot subject property is covered by a 2-level, 2,250 square foot building used as a retail paint store (Parcel 030) and associated parking lot (Parcel 031). PIIE understands the existing building/structure was built in 1925. The San Francisco County Assessor's Office identifies the 2-parcel subject property as Assessor's Parcel Number (APN) 3726-030 and -031, and parcel dimensions approximate 50 feet along Howard Street by 90 feet deep.

Site History

According to the historical information reviewed, the Property was developed with the current building in the 1920s on a site which has recently been used for a rooming house.
Former site use includes: 1) an ornamental iron company 1925-1930; 2) a soda fountain company 1935-1953; 3) a sausage company in 1958; 4) a refrigerator company 1958-1971; 5) a heating and air conditioning company 1977; and 6) a retail paint company 1990-2016.
Prior building uses are as follows: the Braun-Steeple Ornamental Iron Company from 1925-1930; 2) the San Francisco Soda Fountain Company from 1935-1953; 3) Shensens Purity Sausage Company circa 1953-1958; 4) the California Refrigerator Company from 1958-1971; 5) the Pameco Air, Heating, and Air Conditioning Company circa 1971-1977; and 6) City Paints (a retail paint store) from 1990-2016. The building is currently occupied by a small commercial laboratory.

JC comment: This was a cannabis manufacturing site

Proposed Project Scope

The proposed project includes the demolition of the current building and the construction of a new mixed-use development with 22 dwelling units and one commercial retail space.

Phase II Work Plan

Soil boring B2 will be advanced at the location of the proposed elevator. PIIE proposes to advance and log four exploratory soil borings advanced at random representative locations to depths of 3.0 feet bgs and one exploratory soil boring to a depth of 5.0 feet bgs at the location of the proposed elevator.

Sample Documentation

PIIE will utilize a unique sample numbering system to identify sample locations and depths. Each sample will be designated with the following: 1) Unique soil boring number – "B1 to B5"; and 2) maximum depth – "B1-2.0". A soil sample designated B1-2.0 is therefore a soil sample collected in soil boring B1 from approximately 1.5-2.0 feet bgs. Each respective sample designation will be placed at the top of the sample label and on its own line of the chain of custody form. Based on the limited scope of work and types of analyses, PIIE proposes that no duplicate or trip blank quality assurance/quality control (QA/QC) samples be analyzed.

Phase II Subsurface Investigation Report

This investigation consisted of advancing four exploratory soil borings to approximately 4.0 feet bgs in accessible locations, logging and screening encountered soils, collecting representative soil samples from the borings, and analyzing select representative soil samples for CAM 17 metals including total and soluble lead, total extractable petroleum hydrocarbons (TEPH), and semi-volatile organic compounds (SVOCs).

On July 19, 2019, PIIE advanced four exploratory soil borings B1 through B4 at select locations using a track-mounted, mobile access Geoprobe rig. Each soil boring was explored with a utility probe to 4 feet bgs and a permit was not necessary to perform this scope of work. Soil borings B1 through B4 were advanced in accessible representative locations across the Site. Soil boring B1 was advanced in the northwest area of the property, soil boring B2 was advanced immediately adjacent to the proposed elevator and central portion of the Site, soil boring B3 was advanced in

the southeast central portion of the building, and soil boring B4 was advanced in the southern corner of the property.

Findings

Subsurface Conditions

Surface topography at the Site is relatively flat with a small slope down to the northeast. The asphalt pavement in the parking lot is approximately 3 to 4 inches thick. Fill materials were observed in soil in soil borings B1 through B4 to the total depth 4 feet bgs. The fill materials consisted of primarily of brick fragments with lesser amounts of burnt wood, ash, and debris. Soils in each soil boring consisted primarily of homogeneous, unconsolidated, fine to medium grain, well sorted, gray to reddish brown sand to 3.5 feet bgs, and light brown to yellow brown sand from 3.5 to 4.0 feet bgs. Generally, the observed soils were similar in all four soil borings to the depth of investigation. No field indications of impact were noted in soils in the four soil borings, such as odors, apparent discoloration, or measurable readings with a photoionization detector (PID). Groundwater was not encountered during this investigation and the depth to groundwater has been estimated at 15 feet bgs.

Soil analytical results

Representative soil samples were obtained in soil borings B1 through B4, composited by the laboratory, and selectively analyzed for TEPH as diesel and motor oil-range petroleum Hydrocarbons by EPA method 8015b, CAM 17 metals by EPA method 6010b, and SVOCS by EPA method 8270c. No soluble lead testing was performed. TEPH analytical Results are summarized in table 1 and CAM 17 metal analytical results are summarized In table 2.

TEPH concentrations were reported in the two composite soil samples collected at 0.5- 1.0 foot bgs and 2.5 to 3.0 feet bgs. Lead, antimony, barium, and zinc (metals commonly Used in paint) were elevated in the composite soil sample collected at 2.5-3.0 feet bgs Which was significantly more representative of the soil containing earthquake fill materials.

Soluble lead by stlc and tclp methodology demonstrates that soil to approximately 4.0 feet bgs qualifies as california hazardous soil and non-hazardous federal RCRA soil. With the exception of one detection, no svoc concentrations were reported above their Respective laboratory reporting limit in the two analyzed composite soil samples. Pyrene was reported at 0.098 mg/kg in comp 5-8 at 3.0 feet bgs.

TABLE 1 – TEPH Analytical Results

Sample ID Depth	Depth (ft)	TEPH as Diesel (mg/kg)	TEPH as Motor Oil (mg/kg)
COMP 1-4	0.5 – 1.0	72Y	300
COMP 5-8	2.5 – 3.0	29Y	200
Residential ESL		230	5,100

Note: = Y = Chromatographic pattern does not resemble standard (likely represents weathered hydrocarbons)

TABLE 2 - CAM 17 Metal Analytical Results

Constituent	COMP 1-4@ 0.5ft (mg/kg)	COMP 5-8@ 3ft (mg/kg)	San Francisco Average (ESL)
Antimony	<1.9	15	<1
Arsenic	3.3	5.1	10
Barium	130	470	1,000
Beryllium	0.30	0.36	<1
Cadmium	0.43	0.62	---
Chromium	25	41	100-700
Cobalt	10	7.1	10-70
Copper	35	110	30-150
Lead	87	5600	30-300
Mercury	0.36	0.27	0.2-1.3
Molybdenum	0.71	0.61	<3
Nickel	38	47	20-70
Selenium	<1.9	<1.9	0.1
Silver	<0.24	<0.27	---
Thallium	<0.47	<0.49	---
Vanadium	33	30	100-300
Zinc	130	820	120-190

Notes: All results are in milligrams per kilogram (mg/kg) approximately equal to parts per million (ppm)
< Not detected above laboratory reporting limit indicated
** According to United States Geologic Survey Professional Paper 1270*

Discussion:
This Phase II investigation was performed specifically to characterize soil for suspect constituents of concern and document general quality in soil proposed for excavation and moving onsite to achieve final grade. PIIE understands that little or no soil will require off haul and disposal. The primary suspect constituents of concern were metals (specifically lead), petroleum hydrocarbons, and SVOCs. Site history and observations in the soil borings, soil screening, and the results of analytical testing document that historical commercial use of the building has not impacted the subsurface.

PIIE advanced four continuously-cored exploratory soil borings in random and select representative locations across the Site specifically to collect representative soil samples to 4.0 feet bgs. No evidence of historical Site use impacts was noted during this investigation. Encountered soils consisted of uniform fine to medium grain sand from the surface to 4.0 feet bgs. With the exception of fill, no field indications of impact, such as odor, discoloration, or elevated PID reading were noted in investigated soils.

In all four soil borings, PIIE observed earthquake fill materials in soil from the surface to approximately 36 to 42 inches bgs and elevated total lead was reported in COMP 5-8 (collected at approximately 2.5 to 3.0 feet bgs and representative of the soil from 1.5-4.0 feet bgs). PIIE did not request soluble lead analyses using STLC and TCLP methodology at this time due to the fact that soil off haul is unlikely. Based on Site history, the consistent soil conditions observed across the parking lot, PIIE estimates that similar soils containing earthquake fill and elevated lead are almost certainly present below the building.

Observations and soil sample analytical results documented typical San Francisco shallow soil conditions in the area that burned following the 1906 earthquake. Fill materials, ash and burnt material, and miscellaneous debris in shallow soil contained elevated lead and higher than expected concentrations of TEPH. Due to paint particles in the soil, confirmation soil samples should be collected from a larger volume of soil.

Petroleum Hydrocarbons
TEPH petroleum hydrocarbons were reported ranging from 200 to 300 mg/kg. The reported TEPH concentrations at 1.0 and 3.0 feet bgs were fairly similar and reflect typical TEPH concentrations in soil exhibiting significant amounts of earthquake fill. The TEPH concentrations are below their respective residential ESL values and the reported laboratory flag suggests that the diesel-range hydrocarbons are likely degraded motor oil range hydrocarbons. The source of the TEPH in soil is earthquake fill materials and is likely from tar fragments, asphalt shingles, tar paper, or other roofing materials.

Metals
Lead was reported at a concentration of 5,600 mg/kg in soil containing significant amounts of manmade fill materials. Antimony, barium and zinc were similarly elevated and likely due to painted surfaces that burned in the 1906 Earthquake and fire. The sandy soils at approximately 0.5 to 1.0 feet bgs without fill materials reported significantly less lead, antimony, barium, and zinc, and were more indicative of native metal concentrations. Soluble lead testing utilizing STLC

methodology reported 5.6 milligrams per Liter (mg/L) in soil at 1.0 foot bgs and 60 mg/L lead in soil at 3.0 feet bgs. Soluble lead testing utilizing TCLP methodology reported 0.057 mg/L lead in soil at 3.0 feet bgs.

Antimony was reported at 15 mg/kg. The residential environmental screening level (ESL) for antimony is 11 mg/kg (residential shallow soil exposure, non-cancer hazard) and the commercial ESL is 160 mg/kg. The residential ESL for lead is 82 mg/kg and the commercial ESL is 380 mg/kg.

SVOCs
Composite soil samples collected at 1.0 to 2.0 feet bgs and 3.0 to 4.0 feet bgs were analyzed for SVOCs. With the exception of one detection of Pyrene, no SVOCs were reported in either composite soil sample above laboratory reporting limits. Pyrene was reported at 0.098 mg/kg in COMP 5-8 at 3.0 feet bgs. The residential ESL for Pyrene is 1,800 mg/kg (non-cancer hazard).

Conclusions
Based on representative soil sample analytical results and field observations, PIIE concluded the following:
- Soils at the Site are primarily unconsolidated sand from the surface to approximately 4.0 feet bgs across the Site, and these sands are reported to continue in depth;
- Lead, antimony, and TEPH-range petroleum hydrocarbons were reported at elevated concentrations to a depth of approximately 3.0 to 3.5 feet in native sand soils displaying evidence of fill materials, and soluble lead testing is pending;
- The combination of elevated concentrations of lead, antimony, and zinc suggest impacts in soil from lead-based paint, which historically contained lead in amounts of 7 to 10 percent, or approximately 70,000 – 100,000 mg/kg; this conclusion was confirmed by the significant disparity between soluble lead by STLC and TCLP (60 mg/L versus 0.057 mg/L, respectively);
- With one minor exception, SVOCs were not reported above the laboratory reporting limits and SVOC impacts are generally not suspected in soil at the Site;
- Soil sample analytical results summarized in this report demonstrate that offsite disposal of potential excess soil will be costly and existing soil should be kept onsite during construction and development;
- Due to lead-based paint particles in the soil, more representative soil sampling methods are necessary to more accurately determine total lead concentrations; for example, composite sampling a larger volume of soil from soil stockpiles and trenches will most likely result in lower total lead concentrations;
- Soil remaining at the extent of proposed excavation will likely not meet residential criteria for total lead and composite verification soil sampling following proposed soil excavation and grading activities is warranted;
- Based on the soil sample analytical results, DPH-SAM will request a SMP prior to Site development and will request a Cap Maintenance Plan (CMP) and deed restriction following development to address elevated lead concentrations in soil.

<u>Site Mitigation Plan</u>
PII Environmental (PIIE) has prepared this Site Mitigation Plan (SMP) to describe procedures and agreements that is in effect during soil removal and encapsulation activities at 1088 Howard Street,

San Francisco, California. This SMP summarizes tasks necessary to safely mitigate potential human health issues related to excavating lead-impacted soil under currently applicable regulations.

The scope of work to be performed at the Site will consist of:

- Excavating soil materials to install the foundation and any footers;
- Excavating excess soil materials to achieve finished grade;
- Stockpiling, handling, and loading excess soil for proper offsite disposal; and
- Collecting confirmatory soil samples at the extent of excavation and analyzing the soil samples for constituents of concern.

Soil Remediation:

Remedial soil excavation is not being proposed during bulk excavation; however offsite disposal of excess soil will remediate a portion of the lead-impacted soil. In the event unknown conditions, odor, or apparent soil discoloration are noted in soil at the extent of excavation, representative soil samples will be collected in those locations to characterize this soil and help evaluate the need for potential soil remediation.

Encapsulation:

DPH routinely approves encapsulation of lead-impacted soil onsite. In order to remove the appropriate volume of soil necessary to construct the proposed building foundation and encapsulate lead-impacted soil beneath the mat slab, the following steps should be performed:

1. Surface soil to an approximate depth of 2.0 feet bgs containing fill materials will be moved around the property and graded as necessary;
2. The minimal volume of excess soil should be excavated and disposed offsite after being profiled using the existing soil analytical data;
3. Calculate the volume of soil lost due to soil compaction efforts to ensure that the proper minimal volume of soil has been removed to achieve final grade following backfilling with new clean backfill material; and
4. Take any and all steps necessary to fulfill the goal of successfully encapsulating lead impacted soil onsite under the proposed mat slab foundation and dispose of excess soil after being profiled.

The general intent of this work is to leave lead-impacted surface soil onsite and encapsulated under the proposed building foundation. Confirmation soil sampling at the extent of excavation is not warranted. No other constituents of concern are suspected in shallow soil.

Pathways for Hazardous Substance Dispersion:

The potential exists for lead in soil to be dispersed from the soil through particulates in air during soil excavation and loading activities or by carrying "dust" off the Site by personnel or equipment. Dispersion by air shall be controlled by using "dust" control measures, enforcing site control measures, and erecting perimeter access control such as fencing, barricades, or caution tape. Soil particulates may also be ingested through hand to mouth contact, poor personal hygiene, and inadvertently ingesting soil by drinking, eating, or smoking.

Air monitoring and Best Management Practices will be performed to demonstrate that proper "dust" suppression eliminates or significantly reduces potential exposure via inhalation of soil particulates, and enforcing a site-specific HSP and good worker hygiene in the construction zone

eliminates or significantly reduces potential exposure via inhalation or ingestion of soil particulates.

Health and Safety Plan and Soil Management Plan Availability:
Any site specific HSP and this SMP should be available to: employees, employee designated representatives, Owners and their representatives, and personnel of federal, state, or local agencies. The HSP should specifically address the potential for exposure to lead in soil and include mitigation measures to prevent ingestion of lead. A copy of PIIE's site-specific Health & Safety Plan is included in Appendix 3 of the report submitted to EHB-SAM.

Soil Removal Protocol and Procedures:
A designated work boundary shall be established for soil excavation activities at the Site. During soil excavation activities, all exposed soil surfaces should be kept visibly moist by water spray. Transport vehicles should be loaded on pavement capable of being properly cleaned or appropriate plastic sheeting during loading activities. Air monitoring should be conducted in accordance with the HSP at the worker breathing zone and downwind of the work boundary. Since the Site is surrounded on three sides (northwest, northeast, and southwest) by existing 4-story and 5-story buildings, air monitoring will be primarily performed southeast on Howard Street in the downwind direction.

During periods of inactivity longer than 12 hours, exposed soil should be covered with minimum 10-mil plastic sheeting or other covering to minimize soil dispersion and drying.
Security fencing should be locked and open excavations will be demarcated with barricades and/or caution tape during periods of inactivity and at the end of each workday to reduce the potential of personnel falling into the excavation. The excavation will be maintained to mitigate physical hazards to personnel working in or entering the area after soil removal is completed. Soil excavation and removal will extend to an estimated depth of 4.0 feet below original ground surface.

During excavation, any unknown subsurface equipment, including metallic vessels, oil water separators, drums, and metal piping, shall be placed on plastic sheeting for inspection by the Environmental Consultant. In the event an underground storage tank(s) (UST) is encountered, excavation will immediately cease at that location and the tank will be inspected by the Environmental Consultant. Any identified USTs should be removed under an expedited tank removal permit. In the event soil is uncovered displaying significant odor or discoloration, excavation will immediately cease at that location and the soil will be inspected by the Environmental Consultant. If the volume of suspect soil is relatively small (10 cubic yards or less), it can be removed and placed on plastic sheeting for subsequent inspection and sampling.

Noise:
Consistent with City of San Francisco construction noise ordinances, all work will be performed between 7 AM and 7 PM, Monday through Friday. Any work performed on Saturday or Sunday will be performed between 9 AM and 5 PM. Any work producing noise greater than 75 decibels, such as jack hammering, should be performed between 9 AM and 5 PM only.

Soil Particulates (Dust):
As specified in Construction Dust Control Ordinance 176-08, recently codified as San

Francisco Health Code Articles 22B, all site preparation work, demolition, or other construction activities that have the potential to create dust or will expose or disturb more than 10 cubic yards or 500 square feet of soil must comply with specified dust control measures whether or not the activity requires a permit from the Department of Building

Inspection. The intent of this ordinance is to reduce the quantity of dust generated during site preparation, construction and demolition in order to protect the health of the general public, protect the health of on-site workers, minimize public nuisance complaints, and avoid orders to stop work by the Department of Building Inspection or SFDPH.

Provisions summarized below constitute a Dust Control Plan as required by Article 22B:
□ Concrete being prepared for demolition will be watered as necessary to avoid creating visible dust at all times;
□ All active construction areas will be watered no less than three times per shift per day to eliminate visible dust at all times;
□ Additional watering will be performed whenever wind speed exceeds 15 miles per hour, and two or more streamers will be placed in visible locations to estimate / confirm approximate wind direction and speed;
□ Watering should moisten soil only and no water runoff should be produced at any time;
□ At the end of each work day, all streets, sidewalks, paths, and intersections where work occurred will be wet swept or vacuumed to remove visible soil;
□ Cover any inactive soil piles (soil not expected to be disturbed for more than seven days) with 10 mil (0.01 inch) plastic sheeting or equivalent tarp and braced down to avoid drying and wind damage;
□ One portable, hand-held Extech VPC300 Particle Counter (or equivalent Particulate Dust Monitor) will be used to monitor particulates in air along Howard Street, and data reviewed for purposes of determining background and/or dust levels in wind entering and leaving the subject Site;
□ Action levels are particulates greater than 250 mg/m3 over a 5 minute period and an average particulate level greater than 50 mg/m3 over a 24 hour period, however all soil excavation is anticipated to be performed in one to two 8-hour days;
□ Signage will be placed on Howard Street to inform surrounding community members of the hotline phone number(s) to call and report visible dust problems;
□ All loading trucks or metal bins carrying excavated material will be below the sides and back of the truck or bin, and loaded soils will be properly covered to avoid dust and soil drying during transport; excavated materials must be moistened prior to transport;
□ Truck tires will be brushed prior to leaving the Site and the truck loading area on Howard Street will be routinely swept (2X per day) and cleaned to avoid creating visible dust; and
□ Terminate soil handling activities when the wind speed exceeds 25 miles per hour, or visible dust is being created that cannot be mitigated by soil moistening.

Instrumentation and Methodology:
The Extech VPC300 simultaneously displays particle sizes of 10 microns, 5 microns, 2.5 microns, 1.0 micron, and 0.5 micron, and is a superior instrument to differentiating background particulates in air entering the Site from "dust" that may be created during construction and soil handling activities.

Particulate Monitoring:
The VPC300 Particle Counter (or equivalent) should be used in two ways: 1) to confirm background particulate (dust) concentrations in air along Howard Street; and 2) to obtain particulate concentrations at the exit gate to the Site on Howard Street and the downwind corner of the property during normal activities to document actual particulate levels leaving the Site and ensure dust suppression is adequate.
General Contractor: Transatlantic Construction
Onsite Project Manager: Mr. Leo Cassidy
Office Contact Number: TBD
Mobile Contact Number: 415-244-1202
Excavation Contractor: Transatlantic Construction
Contractor Phone Number: 415-244-1202
Environmental Consultant: PIIE, David DeMent
Mobile Contact Number: 510-520-2372
Specific measures will be implemented by the Excavation Contractor based on previous experience handling similar lead-impacted soils in San Francisco.

Contractor Specific Measures:
During grading, excavation, and compacting activities, misted water may be used to minimize fugitive particulate emissions. Stock piled spoils should be moistened and covered until they are disposed.
During work operations, water will be used to wet down the area that is being excavated. During the excavation process, water spray should be used to minimize any fugitive particulate emissions. The ground will be sprayed with to minimize fugitive particulate emissions from haul trucks and excavation equipment. Water will be obtained from onsite or from the closest fire hydrant. During the loading of the trucks with excavation debris, a water spray will be used to minimize fugitive particulate emissions. The trucks will have tarpaulins installed to cover their loads prior to leaving the site to ensure there are no particulate emissions occur while the trucks are in transit.

Contractor Procedures to Minimize Fugitive Particulate Emissions:
a) Water sprays will be used to minimize fugitive particulate emissions during active excavation, stockpiling, and loading material.
b) A supervisor will monitor the excavation process and ensure that water sprays are turned on as required to minimize fugitive particulate matter emissions.
c) A log of the dates and times the water sprays are turned on and off will be maintained, or water will be applied on a scheduled basis at least four times per shift.
d) Water sprays will be used to minimize potential fugitive particulate emissions from the removal of any encountered concrete.
e) A supervisor will monitor the removal of any concrete and ensure that the water sprays are turned on as required to minimize fugitive particulate emissions.
f) A log of the dates and times the water sprays are turned on and off for encountered concrete should be maintained.
g) Water sprays will be used to suppress the dust and minimize fugitive particulate emission from the movement of haul trucks and excavation equipment.

h) A supervisor will monitor the movement of haul trucks and excavation equipment and ensure that either a water truck or water sprays are used as required to minimize fugitive particulate emissions.
i) A log will be maintained of the dates and times the water sprays are turned on and off or the water truck is used.
j) Tarpaulins will be fitted to trucks hauling excavation debris off site, to minimize potential fugitive particulate emissions.
k) A supervisor will ensure that all haul trucks leaving the site with excavation debris will be fitted with a tarpaulin to minimize fugitive particulate emissions.

Management of Excavated Soil:
The Environmental Consultant will observe initial soil excavation activities to help ensure worker safety, compliance with this SMP, document all pertinent soil removal efforts, and collect confirmation samples at the extent of excavation to document remaining soil conditions according to SFDPH requirements.
As necessary, excavated soil will be stockpiled and covered with heavy duty plastic sheeting, 10-mil or thicker. When not covered, soil stockpile surfaces will be kept visibly moist by water spray. Stockpiled soil will then be loaded into transport vehicles for offsite disposal. Transport vehicles will be covered with plastic sheeting or tarp during transportation. Heavy duty plastic sheeting will be placed on the ground at the loading site to prevent transport vehicle tires from contacting contaminated soil and to minimize suspect lead-impacted soil falling off the transport vehicle during loading and contacting bare soil. As necessary, transport vehicle tires should be swept prior to departure to prevent contaminated soil from leaving the loading site.

Specific Soil Handling & Stockpiling Tasks
Based on site observations, feasibility in the field, and upon the direction of the Environmental Consultant, the Excavation Contractor shall:
□ Segregate and stockpile any soils displaying field indications of impact (odor, discoloration, and fill materials), moisten the material to control dust, and covering with plastic sheeting to minimize soil drying pending loading for offsite transport; if there is any question as to the appropriate manner to stockpile this material, consult the Environmental Consultant;
□ To the extent feasible, remove any foreign materials that can be cost effectively recycled or disposed at an accepting landfill, such as concrete, brick, asphalt, wood, and metal and place in a separate location;
□ To the extent feasible, minimize drop heights while loading soil transportation vehicles; and
□ Stockpiled soils should be watered and covered with plastic sheeting at the end of each business day.
Confirmation Soil Sampling
Following excavation to the desired depth, any field indication of impact, if present, will be logged. Site conditions at the limits of excavation will be photo-documented. Based on previous soil characterization, confirmation soil samples are not warranted unless new unknown concerns are uncovered during excavation. If indications of unknown impact are discovered, appropriate soil samples will be collected at the extent of excavation in the location of concern and analyzed for likely constituents of concern. The purpose of any soil sampling will be to further characterize remaining soil following excavation and determine if remedial soil removal is warranted.

If any unknown tanks, sumps, drains, vaults or soils displaying field indications of impact are located during excavation, PIIE will be contacted for inspection. If no liquids, obvious soil staining, or obvious odor are noted, the identified structure will be demolished and disposed. If liquid is present within the structure, or obvious odor or soil staining is noted, PIIE may sample affected media to determine appropriate disposal and document the incident. If stained or odorous soil is encountered and PIIE cannot inspect that business day, the area should be covered with plastic sheeting until it can be inspected and/or sampled.

Confirmation Water Sampling
Dewatering will not be required during excavation.

For further details refer to the documents submitted to EHB-SAM by PII Environmental.

A closure Report will be prepared and submitted to EHB-SAM at end of the completion of the project. This report shall detail a chronology of the construction events, such as soil excavation activities and management activities, as well as summaries of analytical data, bills of lading, manifests, weight tickets, certificates of treatment/disposal of soil and a description of all mitigation activities at the site. This report must also contain certification statement that states that all mitigation activities have been duly performed in accordance with this SMP.

Based on review of documents (1 - 6) EHB-SAM approves this Site Mitigation with the following added conditions. EHB-SAM recommends that dust curtains or windbreaks be installed along the property line of the project site. Post the hotline telephone number/website/email address for community members to call along the fence line. Install at a minimum an air particulate measuring instrument at both upwind and downwind directions of the active work site whose data can immediately be retrieved and shared with potential complainants and the Director of Environmental Health as part of complaint resolution process.

Please be aware that a Deed Restriction and Cap Maintenance Plan (CMP) is necessary at this property so as to capture the issue of the lead contaminated soil that is still left in the ground and soil on the site.

Should you have any questions please contact me at (415) 252-3892 or joseph.ossai@sfdph.org.

Sincerely,

Joseph Ossai

Joseph Ossai, MSEE, PE, REHS
Senior Environmental Health Inspector

cc: Jeanie Poling, San Francisco Planning Department
Daniel Lowrey, San Francisco Department of Building Inspection
Gary Ho, San Francisco Department of Building Inspection
Carrie Pei, San Francisco Department of Building Inspection
PII Environmental (david.dement@ymail.com)

	RETAIL #1088			RESIDENTIAL #1090						
	EXIST.	ADD.	TOTAL	1	2	3	4	TOTAL	COMMON	TOTAL GROSS
7TH FLOOR				704	570	607	665	2,546	686	3,232
6TH FLOOR				704	570	607	665	2,546	686	3,232
5TH FLOOR				704	568	605	665	2,542	705	3,247
4TH FLOOR				704	568	605	665	2,542	705	3,247
3RD FLOOR				704	568	605	665	2,542	705	3,247
2ND FLOOR	416	-416	0	705	784	603	665	2,757	716	3,473
1ST FLOOR	2,065	494	2,559						1,820	4,379
TOTAL	2,481	78	2,559					15,475	6,023	24,057

TOTAL EXISTING RETAIL GROSS AREA = *2481 S.F.*

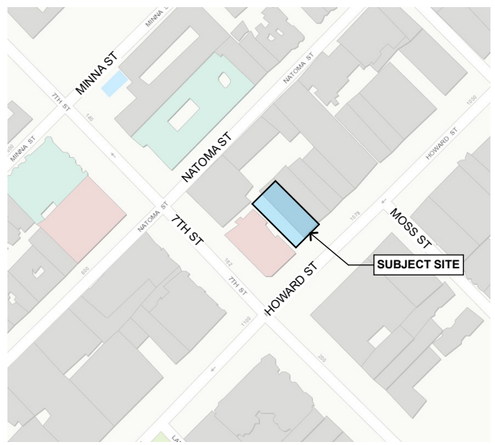
TOTAL PROPOSED LIVING AREA = *15,475 S.F.*
TOTAL PROPOSED COMMON AREA = *6,023 S.F.*
TOTAL PROPOSED RETAIL AREA = *2,559 S.F.* *78 S.F. REMOVED*
TOTAL GROSS AREA = **24,057 S.F.** **21,576 *S.F. ADDED***

NOTE:
AREA CALCULATION AS SHOWN IS INTENDED FOR PERMIT APPLICATION PURPOSES ONLY AND SHALL NOT BE USED FOR SELLING OR LEASING PURPOSES. FINAL SQUARE FOOTAGE AND FINISHED DIMENSIONS MAY VARY FROM THESE PLANS DUE TO CONSTRUCTION VARIABLES.

*** UNIT AREA INCLUDES NET AREA INSIDE OF UNIT ONLY**
**** COMMON AREA INCLUDES ALL AREAS OUTSIDE OF UNIT (COMMON STAIR/HALLWAY, EXTERIOR WALLS, ETC.)**

SHEET INDEX

VICINITY MAP



SLA
SCHAUB LY ARCHITECTS

SCHAUB LY ARCHITECTS INC.
1360 9TH AVENUE, SUITE 210
SAN FRANCISCO CA 94122
415·682·8060

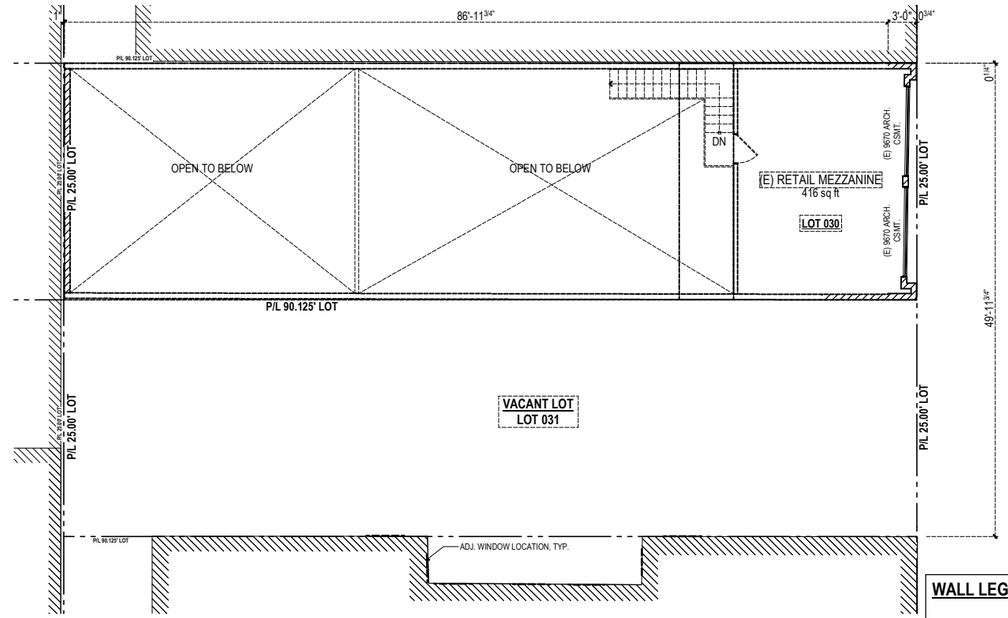
MIXED-USE ADDITION
1088 HOWARD STREET

BLOCK 3726, LOT 030 & 031
1088 HOWARD STREET, SAN FRANCISCO, CA 94103

RENDERING & PROJECT INFORMATION

SCALE: NOT TO SCALE

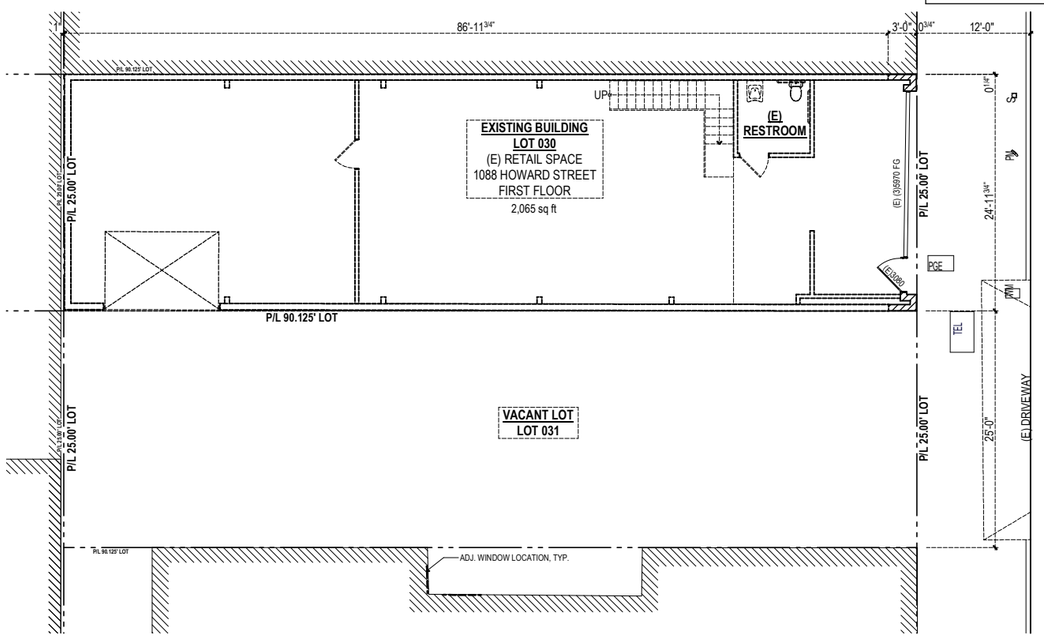
12/15/19 SECTION 311 MM



MEZZANINE EXISTING / DEMOLITION PLAN

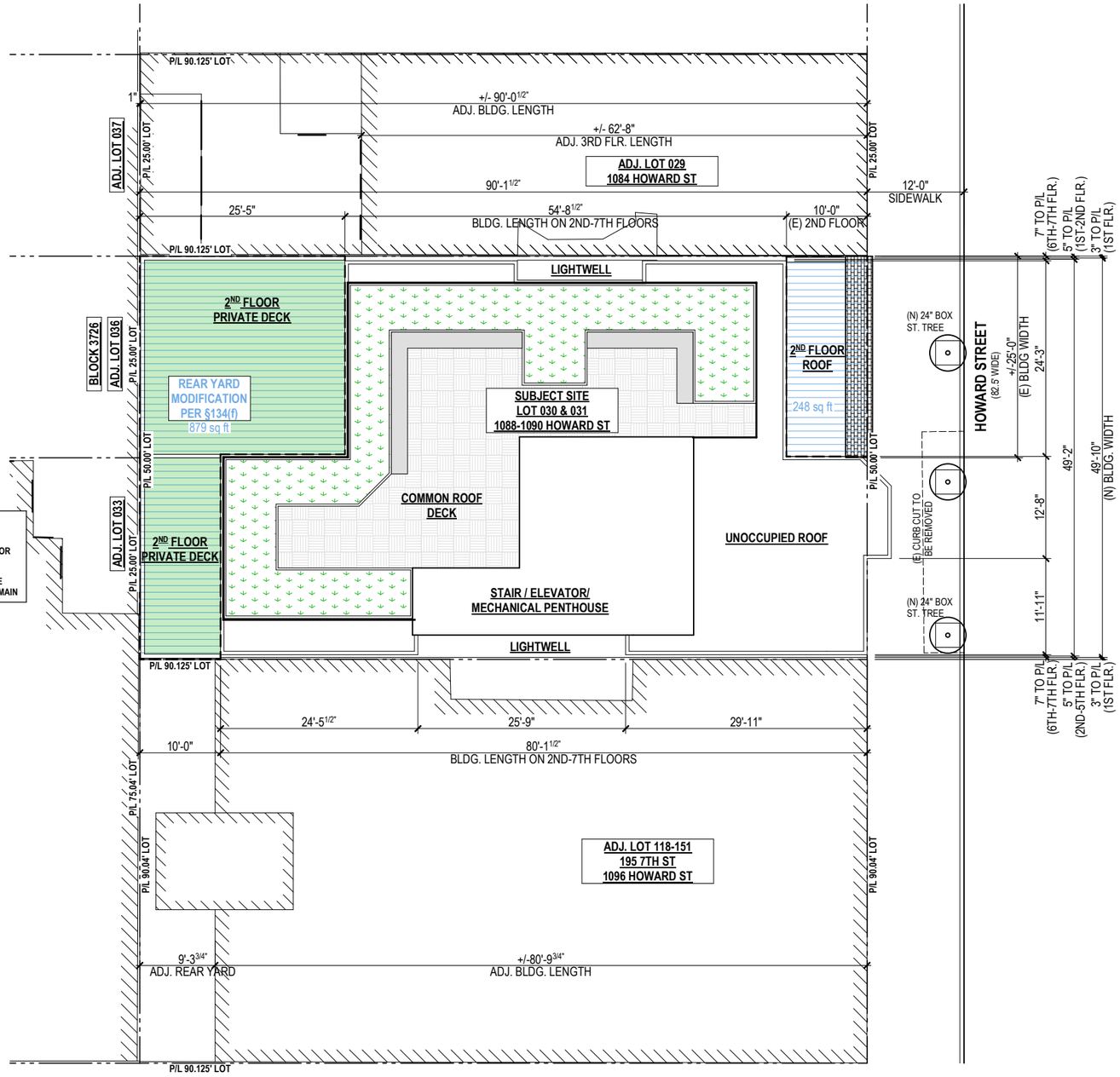
WALL LEGEND

- EXISTING WALL/FLOOR TO BE REMOVED
- EXISTING CONCRETE WALL/FLOOR TO REMAIN



GROUND FLOOR EXISTING / DEMOLITION PLAN

HOWARD STREET



PROPOSED SITE PLAN

SCHAUB LY ARCHITECTS INC.
1360 9TH AVENUE, SUITE 210
SAN FRANCISCO CA 94122
415·682·8060

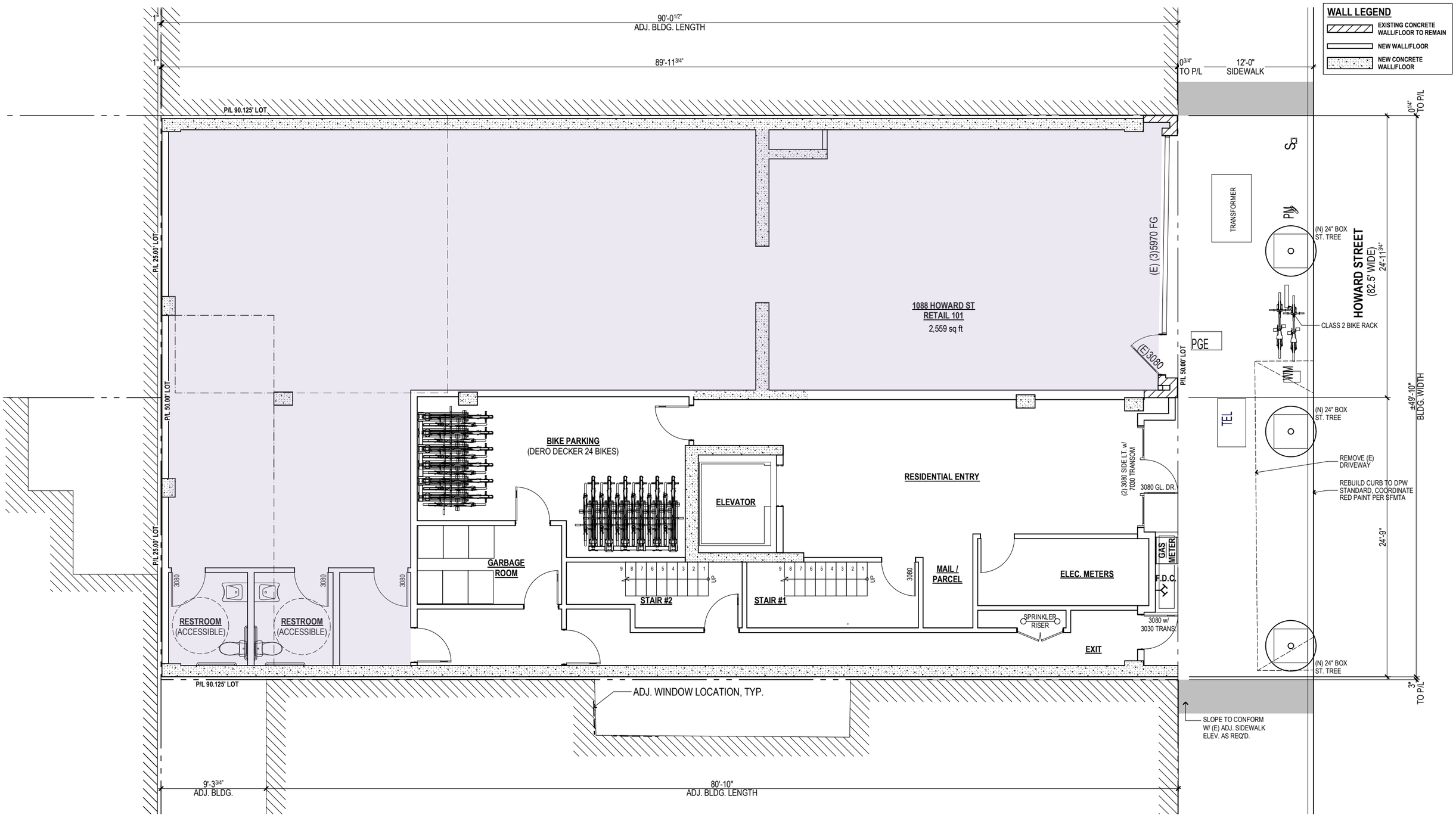
MIXED-USE ADDITION
1088 HOWARD STREET

BLOCK 3726, LOT 030 & 031
1088 HOWARD STREET, SAN FRANCISCO, CA 94103

EXISTING PLANS & PROPOSED SITE PLAN

SCALE: 1/16" = 1'-0" (0, 4', 8', 16')

12/15/19 SECTION 311 MM



SCHAUB LY ARCHITECTS

SCHAUB LY ARCHITECTS INC.
1360 9TH AVENUE, SUITE 210
SAN FRANCISCO CA 94122
415·682·8060

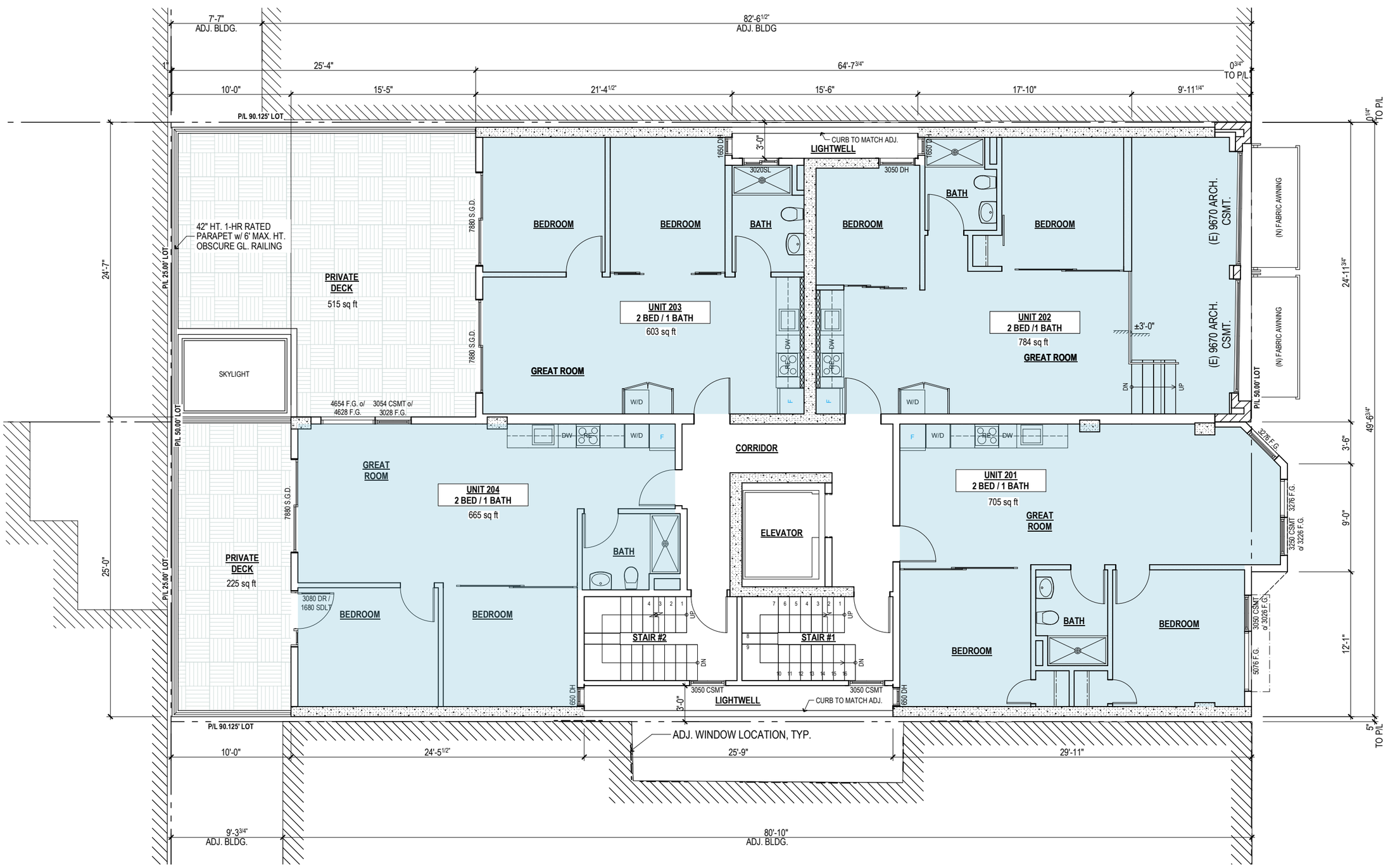
MIXED-USE ADDITION
1088 HOWARD STREET

BLOCK 3726, LOT 030 & 031
1088 HOWARD STREET, SAN FRANCISCO, CA 94103

PROPOSED FIRST FLOOR PLAN

SCALE: 1/8" = 1'-0" 0 2' 4' 8'

12/15/19 SECTION 311 MM



SLA
SCHAUB LY ARCHITECTS

SCHAUB LY ARCHITECTS INC.
1360 9TH AVENUE, SUITE 210
SAN FRANCISCO CA 94122
415·682·8060

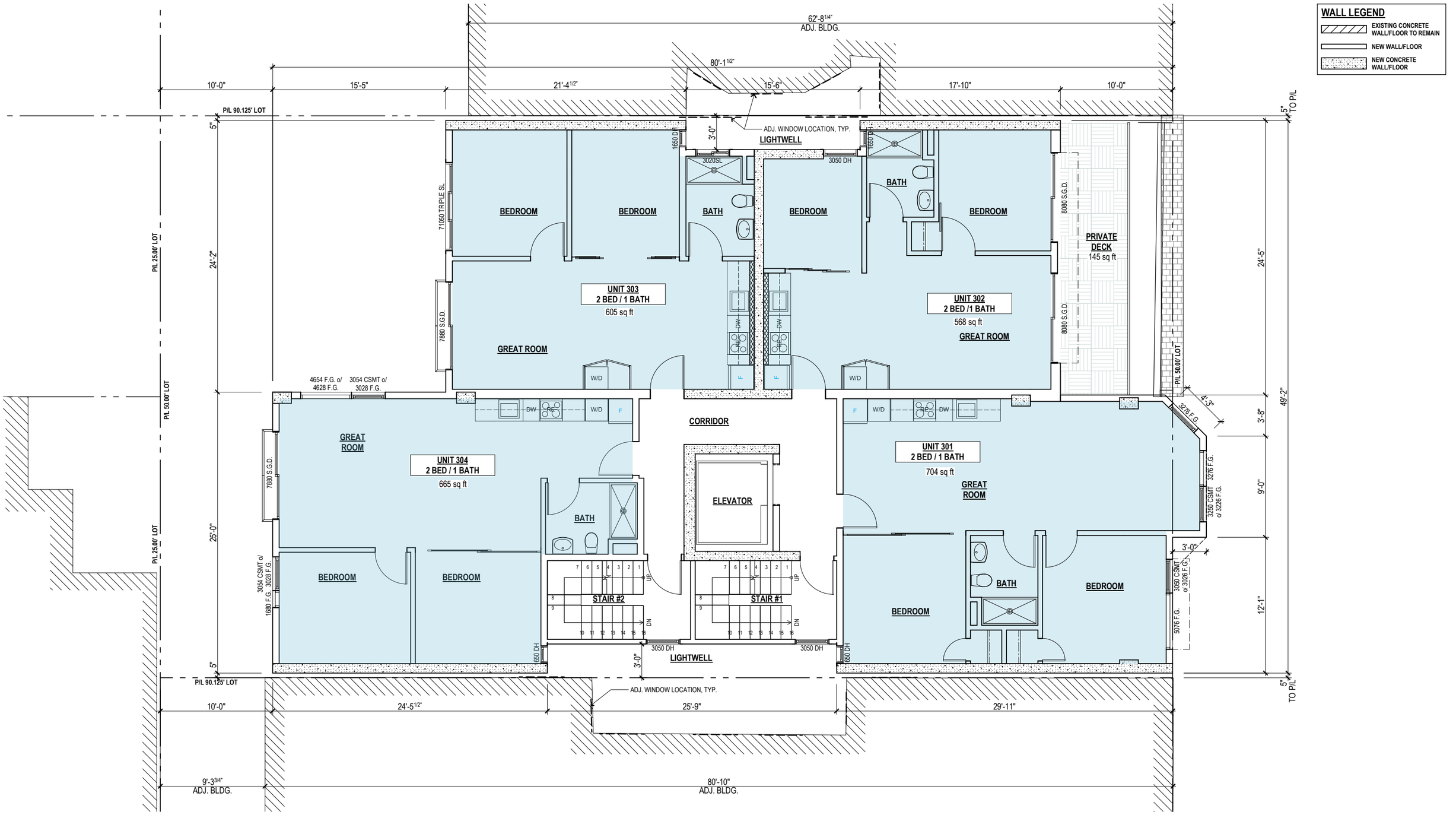
MIXED-USE ADDITION
1088 HOWARD STREET

BLOCK 3726, LOT 030 & 031
1088 HOWARD STREET, SAN FRANCISCO, CA 94103

PROPOSED SECOND FLOOR PLAN

SCALE: 1/8" = 1'-0"

12/15/19 SECTION 311 MM



SCHAUB LY ARCHITECTS

SCHAUB LY ARCHITECTS INC.
1360 9TH AVENUE, SUITE 210
SAN FRANCISCO CA 94122
415·682·8060

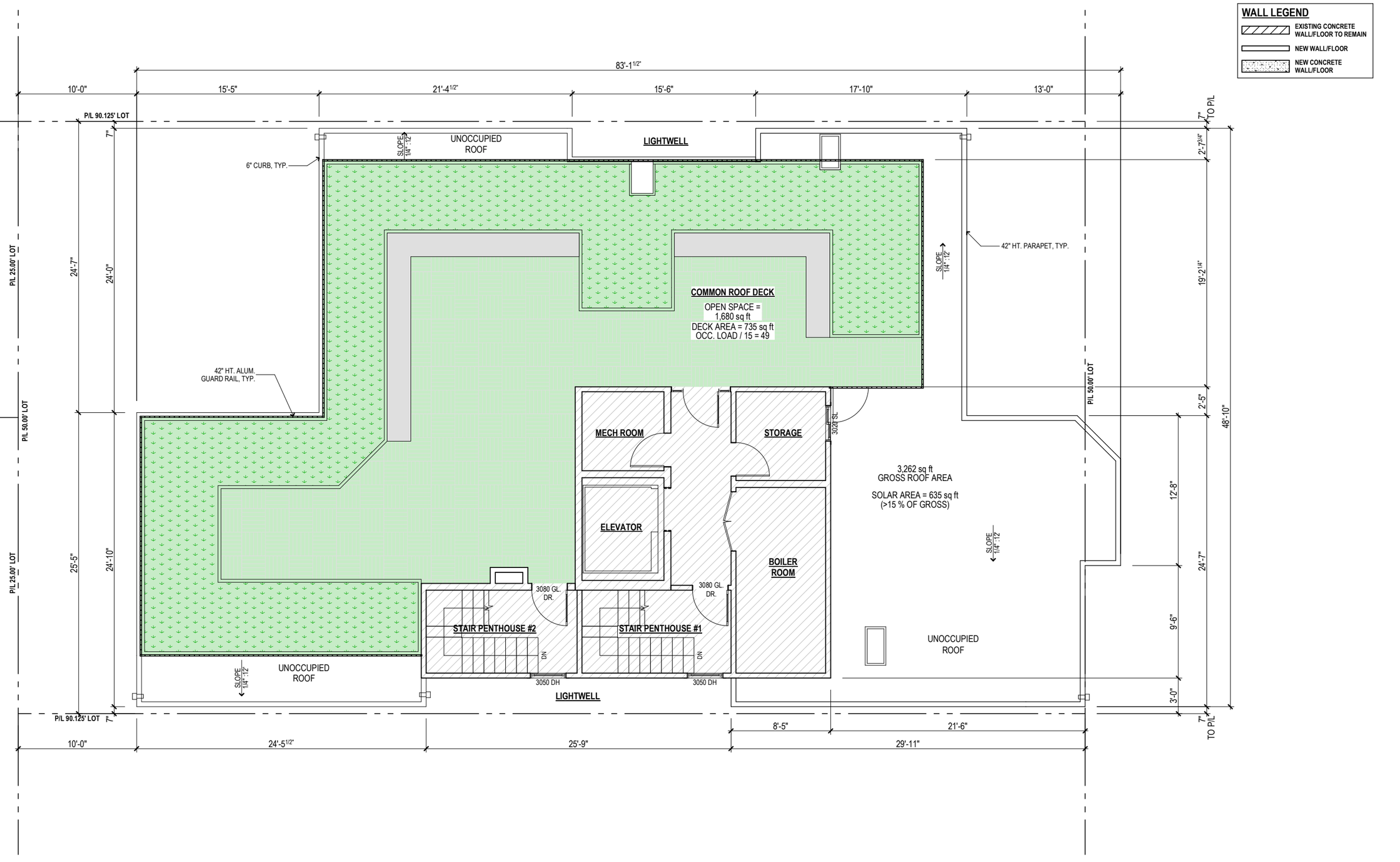
MIXED-USE ADDITION
1088 HOWARD STREET

BLOCK 3726, LOT 030 & 031
1088 HOWARD STREET, SAN FRANCISCO, CA 94103

PROPOSED TYPICAL THIRD-SEVENTH FLOOR PLAN

SCALE: 1/8" = 1'-0"

12/15/19 SECTION 311 MM



SCHAUB LY ARCHITECTS INC.
1360 9TH AVENUE, SUITE 210
SAN FRANCISCO CA 94122
415·682·8060

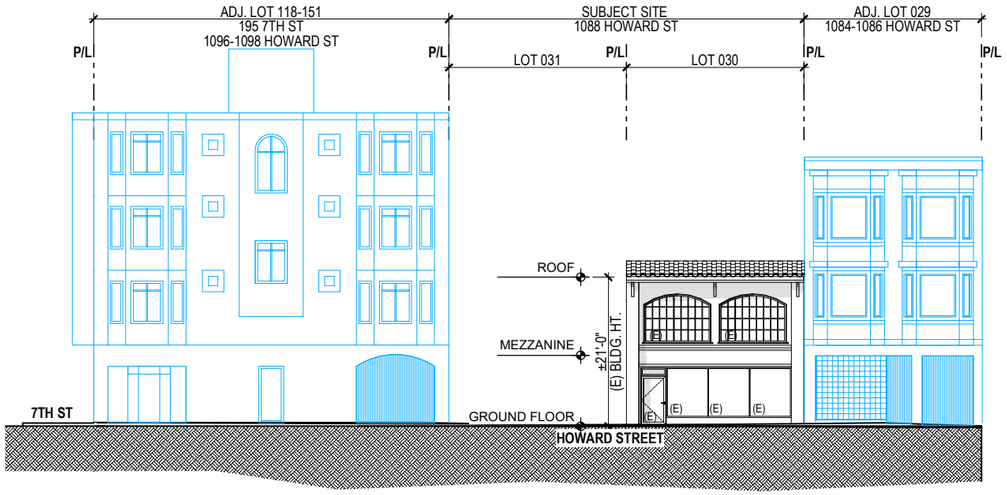
MIXED-USE ADDITION
1088 HOWARD STREET

BLOCK 3726, LOT 030 & 031
1088 HOWARD STREET, SAN FRANCISCO, CA 94103

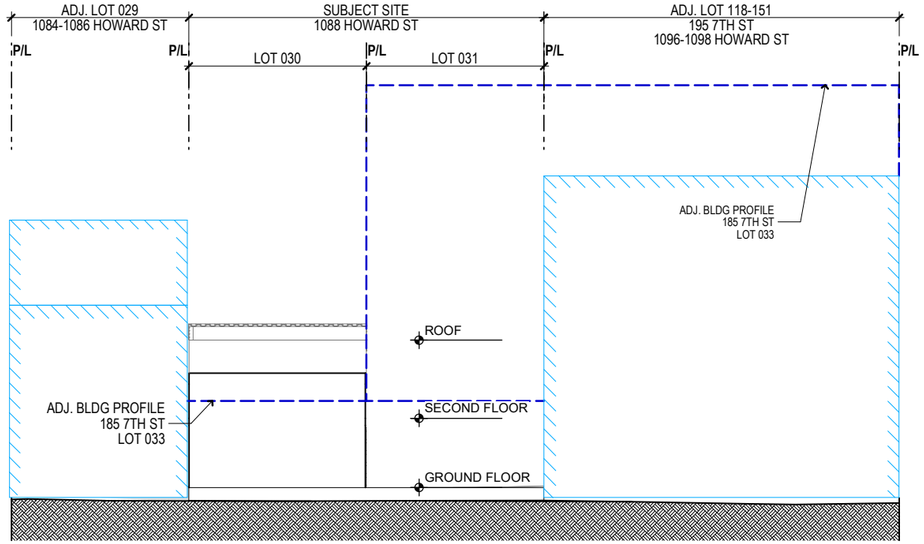
PROPOSED ROOF PLAN

SCALE: 1/8" = 1'-0"

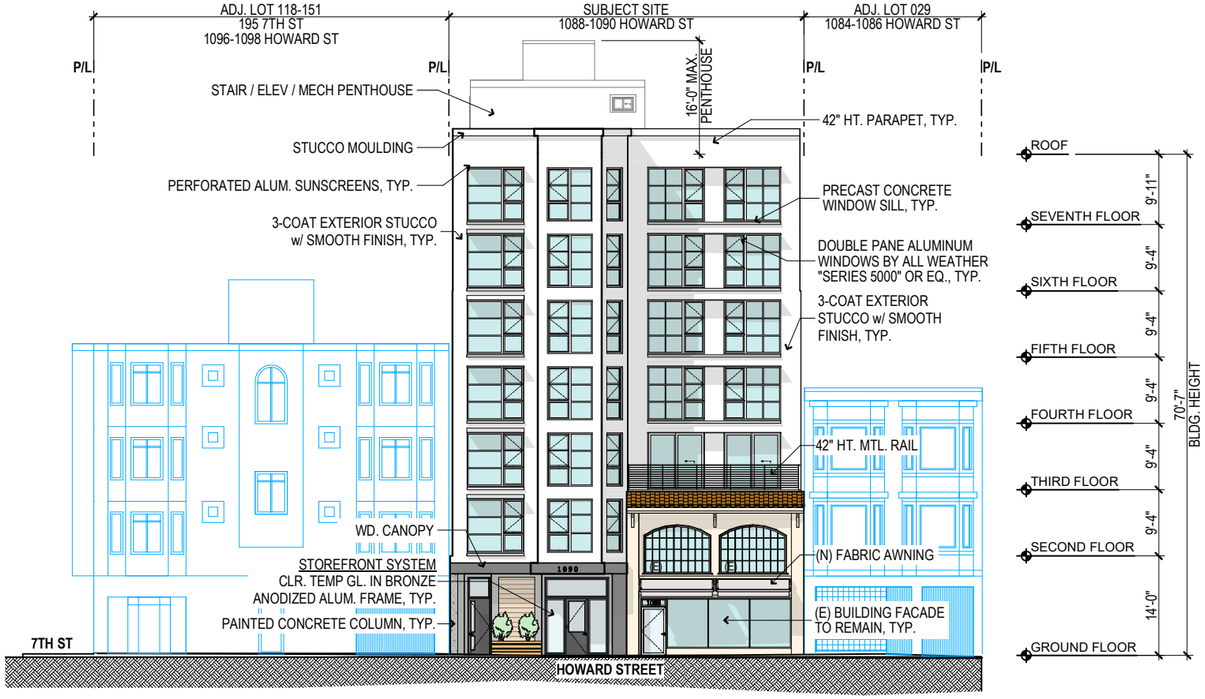
12/15/19 SECTION 311 MM



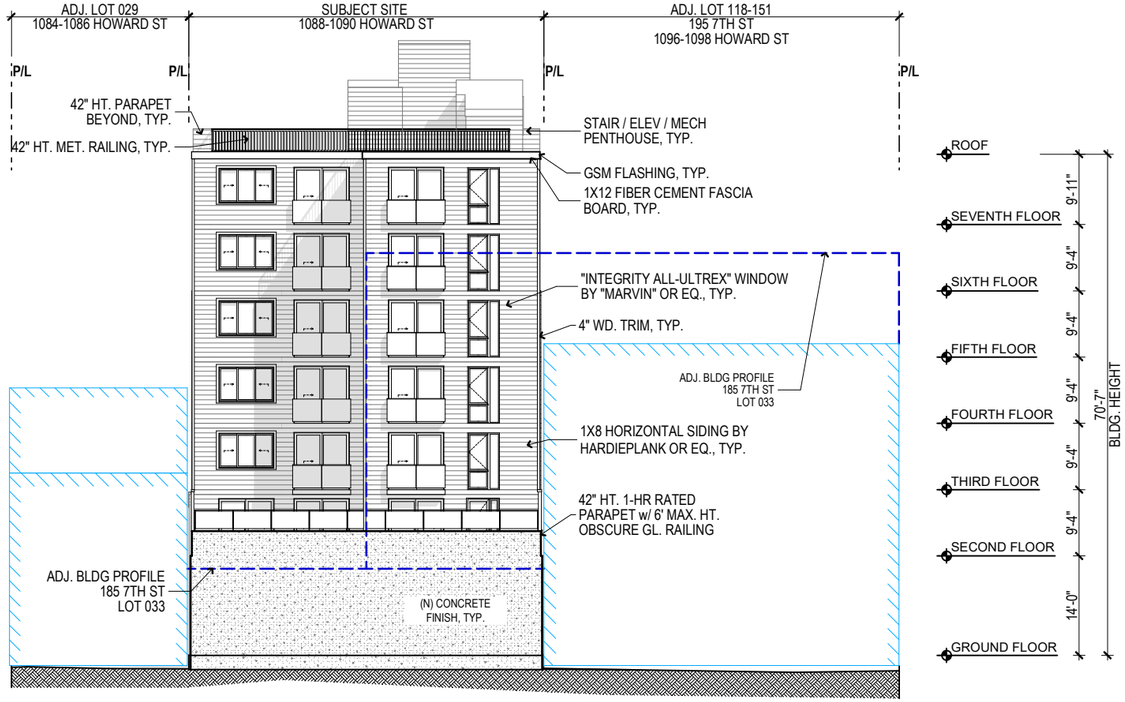
EXISTING FRONT ELEVATION



EXISTING REAR ELEVATION



PROPOSED FRONT ELEVATION



PROPOSED REAR ELEVATION

SCHAUB LY ARCHITECTS INC.
1360 9TH AVENUE, SUITE 210
SAN FRANCISCO CA 94122
415·682·8060

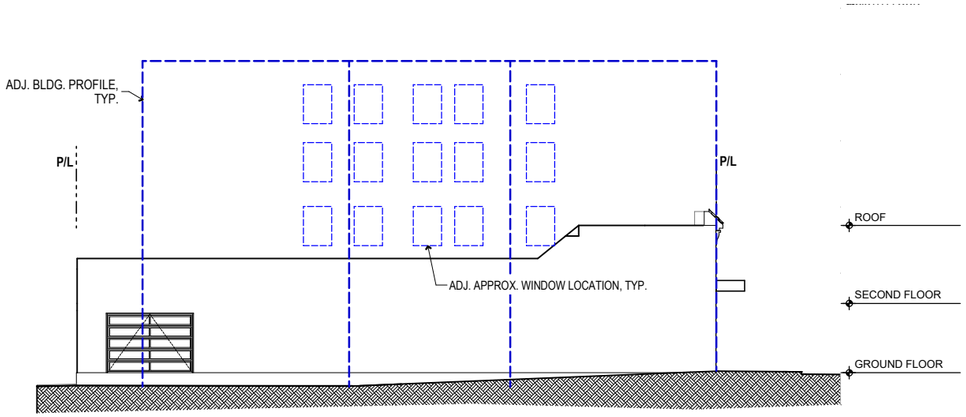
MIXED-USE ADDITION
1088 HOWARD STREET

BLOCK 3726, LOT 030 & 031
1088 HOWARD STREET, SAN FRANCISCO, CA 94103

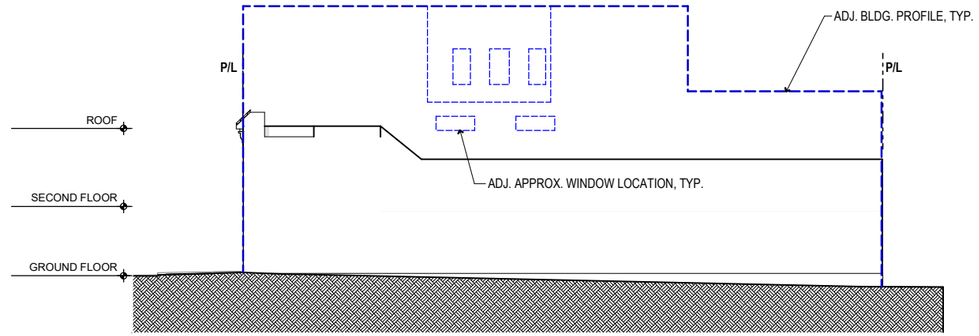
EXISTING & PROPOSED FRONT & REAR ELEVATIONS

SCALE: 3/64" = 1'-0" 0 8' 16' 24'

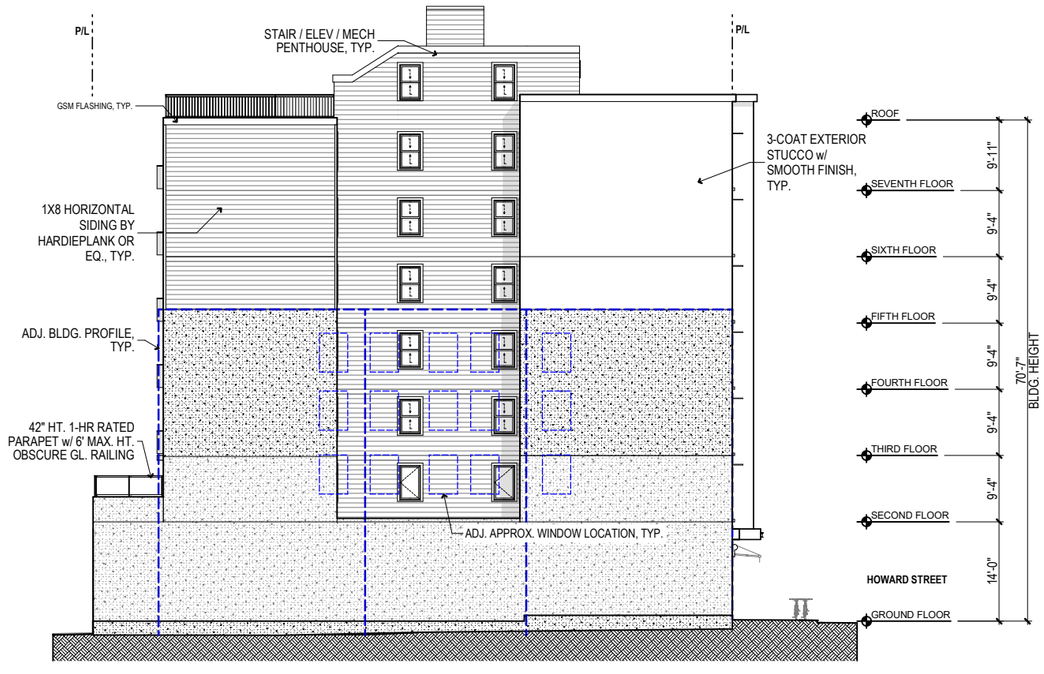
12/15/19 SECTION 311 MM



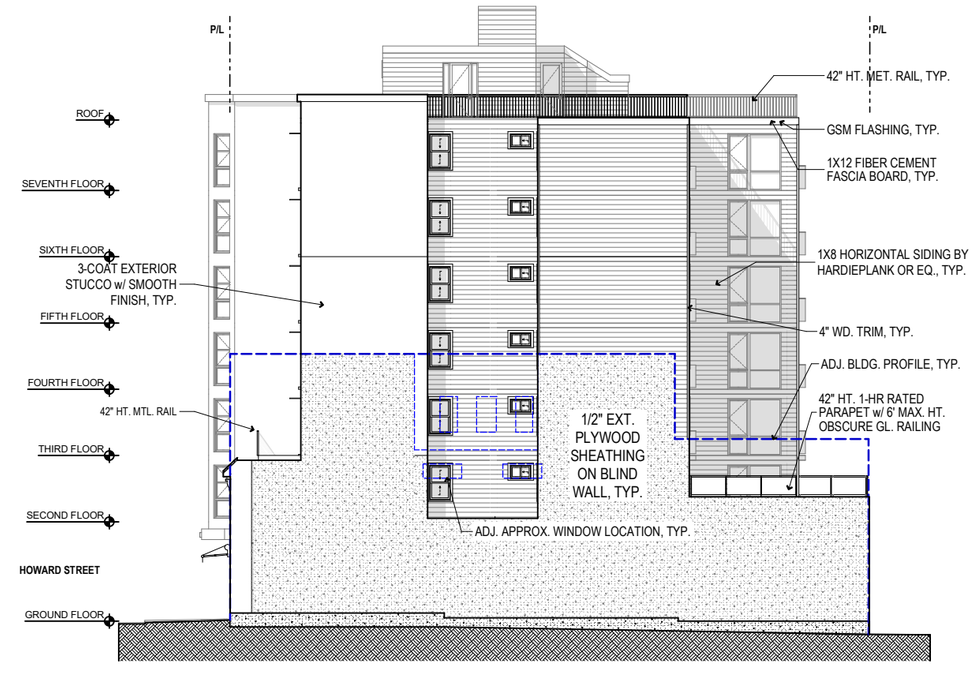
EXISTING LEFT ELEVATION



EXISTING RIGHT ELEVATION



PROPOSED LEFT ELEVATION



PROPOSED RIGHT ELEVATION

SCHAUB LY ARCHITECTS INC.
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SAN FRANCISCO CA 94122
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MIXED-USE ADDITION
1088 HOWARD STREET

BLOCK 3726, LOT 030 & 031
1088 HOWARD STREET, SAN FRANCISCO, CA 94103

EXISTING & PROPOSED SIDE ELEVATIONS

SCALE: 3/64" = 1'-0" 0 8' 16' 24'

12/15/19 SECTION 311 MM