55 LAGUNA STREET

Final Environmental Assessment
Volume 1

Prepared for
San Francisco Mayor's Office of Housing

November 2012

ESA

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TABLE OF CONTENTS

55 Laguna Street
Final Environmental Assessment

Page

Volume 1

Page

Volume 1 (continued)

Page

Volume 1 (continued)

Volume 2 – Appendices (*bound separately*)

List of Figures

List of Tables

CHAPTER 1.0
Project Information

1.1 Project Information

Responsible Entity: [24 CFR 58.2(a) (7)]	San Francisco Mayor's Office of Housing
Certifying Officer: [24 CFR 58.2(a) (2)]	Olson Lee, Director, San Francisco Mayor's Office of Housing and Certifying Officer
Project Name:	Mixed Use Development, 55 Laguna Street
Project Location:	55 Laguna Street, San Francisco, California (San Francisco County Assessor's Parcel Number: 0857001, 0857001A, 0870001, 0870002, 0870003)

Grant Recipient [24 CFR 58.2(a) (5)]**:**	Mercy Housing California
Recipient Address:	1360 Mission Street, Suite 300 San Francisco, CA 94103
Project Representative:	Ramie Dare, Real Estate Developer
Telephone Number:	(415) 355-7118

1.2 Mitigation Measures

[24 CFR 58.40(d), 40 CFR 1505.2(c)]

(List all mitigation measures adopted by the responsible entity to eliminate or minimize adverse environmental impacts. These conditions must be included in project contracts and other relevant documents as requirements).

1.2.1 Memorandum of Agreement

The project sponsor shall implement the stipulations of the Memorandum of Agreement Between the City and County of San Francisco and the California State Historic Preservation Officer. The memorandum is included in **Appendix A** of this document.

1.2.2 Biological Resources

The project sponsor shall complete all demolition activities, including ground clearing, grading, and removal of trees or shrubs, during the non-breeding season (August 1st through January 31st). If this is determined to be infeasible, a qualified wildlife biologist shall conduct preconstruction/ demolition surveys of all potential special-status bird nesting habitat in the vicinity of the buildings to be demolished no more than two weeks in advance of any demolition activities that would commence during the breeding season (February 1st through July 31st). Depending on the survey findings, the following actions shall be taken to avoid potential adverse effects on nesting raptors and other nesting special-status birds:

(1) If active nests of special-status birds are found during the surveys, a no-disturbance buffer zone shall be created around active nests until a qualified biologist determines that all young have fledged. The size of the buffer zones and types of construction activities restricted within them shall be determined through coordination with the California Department of Fish and Game (CDFG), taking into account factors such as the following:

   a) Noise and human disturbance levels at the project site and the nesting site at the time of the survey and the noise and disturbance expected during the construction activity;

   b) Distance and the amount of vegetation or other screening between the project site and the nest;

   c) Sensitivity of individual nesting species and behaviors of the nesting birds.

(2) If preconstruction/demolition surveys indicate that no nests of special-status birds are present or that nests are inactive or potential habitat is unoccupied, no further mitigation is required.

(3) Preconstruction/demolition surveys are not required during the non-breeding season (August 1st through January 31st) for demolition activities including ground clearing, grading, and removal of trees or shrubs.

Furthermore, demolition and/or construction activities commencing during the non-breeding season and continuing into the breeding season do not require surveys (as it is assumed that any breeding birds taking up nests would be acclimated to project-related activities already under way). However, if trees and shrubs are to be removed during the breeding season, the trees and shrubs shall be surveyed for nests prior to their removal, according to the survey and protective action guidelines 1a though 1c, above.

Nests initiated during demolition or construction activities are presumed to be unaffected by the activity, and a buffer is not necessary.

Destruction of active nests of special-status birds and overt interference with nesting activities of special-status birds shall be prohibited.

Trees and shrubs that have been determined to be unoccupied by nesting special-status birds may be removed as long as they are located outside of any buffer zones established for active areas.

The “Sacred Palm” shall be replanted on the project site upon completion of construction activities.

1.2.3 Soil Management Plan and Health and Safety Plan

The project sponsor shall prepare and implement a soil management plan (SMP) and a health and safety plan (HSP), both of which are described below.

Potential hazards to construction workers and the general public during demolition and construction shall be mitigated by the preparation and implementation of a site-specific soil management plan (SMP). Additional testing of site soils will be performed, and the analytical results will be included in the plan. Specific information to be provided in the plan would include soil-handling procedures that segregate Class I from Class II or III fill material and isolate fill material from the underlying native soil. The plan would also include procedures for on-site observation and stockpiling of excavated soils during construction, soil sampling for focused waste classification purposes, and legal disposal at an appropriate disposal facility. In the event that the soil were characterized as a hazardous waste according to state or federal criteria, the soil shall be disposed of at a Class I disposal facility. Soil classified as a non-hazardous waste could be disposed of at a Class II or III disposal facility in accordance with applicable waste disposal regulations.

Potential hazards to construction workers and the general public during demolition and construction shall be mitigated by the preparation and implementation of a site-specific health and safety plan (HSP). The health and safety plan shall meet the requirements of federal, state and local environmental and worker safety laws. Specific information to be provided in the plan includes identification of contaminants, potential hazards, material handling procedures, dust suppression methods, personal protection clothing and devices, controlled access to the site, health and safety training requirements, monitoring equipment to be used during construction to verify health and safety of the workers and the public, measures to protect public health and safety, and emergency response procedures.

1.2.4 Noise Reduction

Construction activities of the Proposed Action shall comply with San Francisco Noise Ordinance (Article 29 of the Police Code). The ordinance requires that noise levels from individual pieces of construction equipment, other than impact tools, not exceed 80 dBA at a distance of 100 feet from the source. Impact tools, such as jackhammers and impact wrenches, must have both intake and exhaust muffled to the satisfaction of the Director of Public Works. Section 2908 of the Ordinance prohibits construction work between 8:00 p.m. and 7:00 a.m., if noise would exceed the ambient noise level by 5 dBA at the project property line, unless a special permit is authorized by the Director of Public Works.

Title 24 of the California Code of Regulations establishes uniform noise insulation standards for residential projects. Residences must be designed to limit intruding noise to an interior CNEL (or DNL) of at least 45 dB. The San Francisco Department of Building Inspection (DBI) would review the final building plans to ensure that the building wall and floor/ceiling assemblies meet state standards regarding sound transmission.

1.2.5 Asbestos & Lead-Based Paint Abatement

Prior to any demolition or issuance of a building permit for a structure known or suspected to have been constructed prior to 1985, an asbestos and lead-based paint survey shall be provided. If asbestos-containing materials were determined to be present, the materials should be abated by a certified asbestos abatement contractor in accordance with the regulations and notification requirements of the Bay Area Air Quality Management District. If lead-based paint is identified, then federal and state construction worker health and safety regulations shall be followed during renovation or demolition activities. If loose or peeling lead-based paint is identified, it shall be removed by a qualified lead abatement contractor and disposed of in accordance with existing hazardous waste regulations.

1.2.6 Geotechnical Investigation

A site-specific, design-level geotechnical investigation for the project shall be conducted. The investigation and final recommendations shall be reviewed and approval by the Department of Building Inspection (DBI), and monitored by a DBI Special Inspector (if required) in conformance with all applicable city ordinances and policies of the California Building Code and the *San Francisco Building Code*. The geotechnical report shall be prepared by a registered geotechnical engineer and approved by DBI, and all recommendations shall be included in the final design of the project.

1.2.7 Construction Stormwater

Project construction shall adhere to the requirements of Article 4.1 of the San Francisco Public Works Code (supplemented by Department of Public Works Order No. 158170), which incorporates and implements the City's NPDES permit, and the federal CSO Control Policy. The project sponsor shall develop and implement an erosion and sediment control plan to reduce the impact of runoff from a construction site. The plan shall be reviewed and approved by the City prior to implementation, and the City shall conduct periodic inspections to ensure compliance with the plan.

1.2.8 Agency Approvals

Prior to construction, the project sponsor must obtain the following approvals from the local jurisdiction:

- San Francisco Planning Commission approval of a conditional use of the site as a modified PUD, which was obtained on August 16, 2012.[1]
- San Francisco Board of Supervisors approval of the land underlying the proposed Waller Park land transfer from the City to the University of California with deed restrictions requiring development and maintenance of the park.
- San Francisco Historic Preservation Commission approval of Certificate of Appropriateness for alterations to Richardson Hall, Woods Hall and Woods Hall Annex, which was obtained May 16, 2012.
- San Francisco Department of Public Works approval of new curb cuts on Buchanan and Laguna Streets to provide site access.

[1] San Francisco Planning Commission, Meeting Minutes, August 16, 2012.

1.3 Summary of Effects and Mitigation Measures

Table 1-1 summarizes the Department of Housing and Urban Development Statutory Checklist and Environmental Standards of the Proposed Action and Preservation Alternative, including applicable mitigation measures. **Table 2-2** summarizes the Environmental Assessment Checklist of the Proposed Action and Preservation Alternative, as well as applicable mitigation measures.

1.4 Findings

[58.40(g)]

X **Finding of No Significant Impact**

(The project will not result in a significant impact on the quality of the human environment)

_____ **Finding of Significant Impact**

(The project may significantly affect the quality of the human environment)

Preparer Signature: 10/31/2012

Name/Title/Agency: Jonathan Carey, Project Manager, ESA Date

RE Approving Official Signature: 11/2/12

Name/Title/ Agency: Olson Lee, Certifying Officer Date

TABLE 1-1
SUMMARY OF STATUTORY CHECKLIST AND HUD ENVIRONMENTAL STANDARDS

Factor / Standard	Mitigation Measures	Applicable To:	
		Proposed Project	Preservation Alternative
3.1: Statutory Checklist			
3.1.1: Historic Preservation	**Mitigation Measure 1.2.1, Memorandum of Agreement:** The project sponsor shall implement the stipulations of the Memorandum of Agreement Between the City and County of San Francisco and the California State Historic Preservation Officer.	Yes	No
3.1.2: Floodplain Management	None		
3.1.3: Wetlands Protection	None		
3.1.4: Coastal Zone Management Act	None		
3.1.5: Sole Source Aquifers	None		
3.1.6: Endangered Species Act	None		
3.1.7: Wild and Scenic Rivers Act	None		
3.1.8: Air Quality	None		
3.1.9: Farmland Protection Policy Act	None		
3.1.10: Environmental Justice	None		
3.2: HUD Environmental Standards			
3.2.1: Noise Abatement and Control	**Mitigation Measure 1.2.4: Noise Reduction:** Construction activities of the Proposed Action shall comply with San Francisco Noise Ordinance (Article 29 of the Police Code). The ordinance requires that noise levels from individual pieces of construction equipment, other than impact tools, not exceed 80 dBA at a distance of 100 feet from the source. Impact tools, such as jackhammers and impact wrenches, must have both intake and exhaust muffled to the satisfaction of the Director of Public Works. Section 2908 of the Ordinance prohibits construction work between 8:00 pm and 7:00 am, if noise would exceed the ambient noise level by 5 dBA at the project property line, unless a special permit is authorized by the Director of Public Works. Title 24 of the California Code of Regulations establishes uniform noise insulation standards for residential projects. Residences must be designed to limit intruding noise to an interior CNEL (or DNL) of at least 45 dB. The San Francisco Department of Building Inspection (DBI) would review the final building plans to ensure that the building wall and floor/ceiling assemblies meet state standards regarding sound transmission.	Yes	Yes

TABLE 1-1 (Continued)
SUMMARY OF STATUTORY CHECKLIST AND HUD ENVIRONMENTAL STANDARDS

Factor / Standard	Mitigation Measures	Applicable To: Proposed Project	Applicable To: Preservation Alternative
3.2: HUD Environmental Standards (cont.)			
3.2.2: Toxics / Hazardous / Radioactive Materials, Contamination, Chemicals or Gases	**Mitigation Measure 1.2.3, Soil Management Plan and Health and Safety Plan:** The project sponsor shall prepare and implement a soil management plan (SMP) and a health and safety plan (HSP), both of which are described below. Potential hazards to construction workers and the general public during demolition and construction shall be mitigated by the preparation and implementation of a site-specific soil management plan (SMP). Additional testing of site soils will be performed, and the analytical results will be included in the plan. Specific information to be provided in the plan would include soil-handling procedures that segregate Class I from Class II or III fill material and isolate fill material from the underlying native soil. The plan would also include procedures for on-site observation and stockpiling of excavated soils during construction, soil sampling for focused waste classification purposes, and legal disposal at an appropriate disposal facility. In the event that the soil were characterized as a hazardous waste according to state or federal criteria, the soil shall be disposed of at a Class I disposal facility. Soil classified as a non-hazardous waste could be disposed of at a Class II or III disposal facility in accordance with applicable waste disposal regulations. Potential hazards to construction workers and the general public during demolition and construction shall be mitigated by the preparation and implementation of a site-specific health and safety plan (HSP). The health and safety plan shall meet the requirements of federal, state and local environmental and worker safety laws. Specific information to be provided in the plan includes identification of contaminants, potential hazards, material handling procedures, dust suppression methods, personal protection clothing and devices, controlled access to the site, health and safety training requirements, monitoring equipment to be used during construction to verify health and safety of the workers and the public, measures to protect public health and safety, and emergency response procedures.	Yes	Yes
	Mitigation Measure 1.2.5, Asbestos & Lead-Based Paint Abatement: Prior to any demolition or issuance of a building permit for a structure known or suspected to have been constructed prior to 1985, an asbestos and lead-based paint survey shall be provided. If asbestos-containing materials were determined to be present, the materials should be abated by a certified asbestos abatement contractor in accordance with the regulations and notification requirements of the Bay Area Air Quality Management District. If lead-based paint is identified, then federal and state construction worker health and safety regulations shall be followed during renovation or demolition activities. If loose or peeling lead-based paint is identified, it shall be removed by a qualified lead abatement contractor and disposed of in accordance with existing hazardous waste regulations.	Yes	Yes
3.2.3: Siting of HUD-Assisted Projects near Hazardous Operations	None		
3.2.4: Airport Clear & Accident Potential Zones	None		

TABLE 1-2
SUMMARY OF ENVIRONMENTAL ASSESSMENT CHECKLIST AND OTHER FACTORS

Effect	Mitigation Measures	Impact Code: Proposed Project	Impact Code: Preservation Alternative
4.1: Land Development			
4.1.1 Conformance with Comprehensive Plans and Zoning	**Mitigation Measure 1.2.8, Agency Approvals:** Prior to construction, the project sponsor must obtain the following approvals from the local jurisdiction: • San Francisco Planning Commission approval of a conditional use of the site as a modified PUD, which was obtained on August 16, 2012. • San Francisco Board of Supervisors approval of the land underlying the proposed Waller Park land transfer from the City to the University of California with deed restrictions requiring development and maintenance of the park. • San Francisco Historic Preservation Commission approval of Certificate of Appropriateness for alterations to Richardson Hall, Woods Hall and Woods Hall Annex, which was obtained May 16, 2012. • San Francisco Department of Public Works approval of new curb cuts on Buchanan and Laguna Streets to provide site access.	4	4
4.1.2 Compatibility and Urban Impact	None	1	1
4.1.3: Slope	**Mitigation Measure 1.2.6**, **Geotechnical Investigation:** A site-specific, design-level geotechnical investigation for the project shall be conducted. The investigation and final recommendations shall be reviewed and approval by the Department of Building Inspection (DBI), and monitored by a DBI Special Inspector (if required) in conformance with all applicable city ordinances and policies of the California Building Code and the *San Francisco Building Code*. The geotechnical report shall be prepared by a registered geotechnical engineer and approved by DBI, and all recommendations shall be included in the final design of the project.	4	4
4.1.4: Erosion	**Mitigation Measure 1.2.6**, **Geotechnical Investigation:** A site-specific, design-level geotechnical investigation for the project shall be conducted. The investigation and final recommendations shall be reviewed and approval by the Department of Building Inspection (DBI), and monitored by a DBI Special Inspector (if required) in conformance with all applicable city ordinances and policies of the California Building Code and the *San Francisco Building Code*. The geotechnical report shall be prepared by a registered geotechnical engineer and approved by DBI, and all recommendations shall be included in the final design of the project	4	4
4.1.5: Soil Suitability	**Mitigation Measure 1.2.6**, **Geotechnical Investigation:** A site-specific, design-level geotechnical investigation for the project shall be conducted. The investigation and final recommendations shall be reviewed and approval by the Department of Building Inspection (DBI), and monitored by a DBI Special Inspector (if required) in conformance with all applicable city ordinances and policies of the California Building Code	4	4

Legend: 1 = No Impact Anticipated; 2 = Potentially beneficial; 3 = Potentially adverse; 4 = Requires mitigation; 5 = Requires project modification;

TABLE 1-2 (Continued)
SUMMARY OF ENVIRONMENTAL ASSESSMENT CHECKLIST AND OTHER FACTORS

Effect	Mitigation Measures	Proposed Project	Preservation Alternative
4.1: Land Development (cont.)			
4.1.5: Soil Suitability (cont.)	and the *San Francisco Building Code*. The geotechnical report shall be prepared by a registered geotechnical engineer and approved by DBI, and all recommendations shall be included in the final design of the project.		
4.1.6: Hazards and Nuisances Including Site Safety	**Mitigation Measure 1.2.6**, **Geotechnical Investigation:** A site-specific, design-level geotechnical investigation for the project shall be conducted. The investigation and final recommendations shall be reviewed and approval by the Department of Building Inspection (DBI), and monitored by a DBI Special Inspector (if required) in conformance with all applicable city ordinances and policies of the California Building Code and the *San Francisco Building Code*. The geotechnical report shall be prepared by a registered geotechnical engineer and approved by DBI, and all recommendations shall be included in the final design of the project	4	4
	Mitigation Measure 1.2.3, Soil Management Plan and Health and Safety Plan: The project sponsor shall prepare and implement a soil management plan (SMP) and a health and safety plan (HSP), both of which are described below. Potential hazards to construction workers and the general public during demolition and construction shall be mitigated by the preparation and implementation of a site-specific soil management plan (SMP). Additional testing of site soils will be performed, and the analytical results will be included in the plan. Specific information to be provided in the plan would include soil-handling procedures that segregate Class I from Class II or III fill material and isolate fill material from the underlying native soil. The plan would also include procedures for on-site observation and stockpiling of excavated soils during construction, soil sampling for focused waste classification purposes, and legal disposal at an appropriate disposal facility. In the event that the soil were characterized as a hazardous waste according to state or federal criteria, the soil shall be disposed of at a Class I disposal facility. Soil classified as a non-hazardous waste could be disposed of at a Class II or III disposal facility in accordance with applicable waste disposal regulations. Potential hazards to construction workers and the general public during demolition and construction shall be mitigated by the preparation and implementation of a site-specific health and safety plan (HSP). The health and safety plan shall meet the requirements of federal, state and local environmental and worker safety laws. Specific information to be provided in the plan includes identification of contaminants, potential hazards, material handling procedures, dust suppression methods, personal protection clothing and devices, controlled access to the site, health and safety training requirements, monitoring equipment to be used during construction to verify health and safety of the workers and the public, measures to protect public health and safety, and emergency response procedures.	4	4

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TABLE 1-2 (Continued)
SUMMARY OF ENVIRONMENTAL ASSESSMENT CHECKLIST AND OTHER FACTORS

Effect	Mitigation Measures	Proposed Project	Preservation Alternative
4.1: Land Development (cont.)			
4.1.7: Energy Consumption	None	1	1
4.1.8: Noise—Contribution to Community Noise Levels	**Mitigation Measure 1.2.4: Noise Reduction:** Construction activities of the Proposed Action shall comply with San Francisco Noise Ordinance (Article 29 of the Police Code). The ordinance requires that noise levels from individual pieces of construction equipment, other than impact tools, not exceed 80 dBA at a distance of 100 feet from the source. Impact tools, such as jackhammers and impact wrenches, must have both intake and exhaust muffled to the satisfaction of the Director of Public Works. Section 2908 of the Ordinance prohibits construction work between 8:00 pm and 7:00 am, if noise would exceed the ambient noise level by 5 dBA at the project property line, unless a special permit is authorized by the Director of Public Works. Title 24 of the California Code of Regulations establishes uniform noise insulation standards for residential projects. Residences must be designed to limit intruding noise to an interior CNEL (or DNL) of at least 45 dB. The San Francisco Department of Building Inspection (DBI) would review the final building plans to ensure that the building wall and floor/ceiling assemblies meet state standards regarding sound transmission.	4	4
4.1.9: Air Quality—Effects of Ambient Air Quality on Project and Contribution to Community Pollution Levels	None	1	1
4.1.10 Environmental Design—Visual Quality, Coherence, Diversity, Compatible Use and Scale	None	1	1
4.2: Socioeconomic			
4.2.1: Demographic Character Changes	None	1	1
4.2.2: Displacement	None	1	1
4.2.3: Employment and Income Patterns	None	2	2
4.3: Community Facilities and Services			
4.3.1: Educational Facilities	None	1	1
4.3.2: Commercial Facilities	None	1	1
4.3.3: Health Care	None	2	2
4.3.4: Social Services	None	2	2
4.3.5: Solid Waste	None	1	1

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TABLE 1-2 (Continued)
SUMMARY OF ENVIRONMENTAL ASSESSMENT CHECKLIST AND OTHER FACTORS

Effect	Mitigation Measures	Proposed Project	Preservation Alternative
4.3: Community Facilities and Services (cont.)			
4.3.6: Waste Water	None	1	1
4.3.7: Storm Water	**Mitigation Measure 1.2.7, Construction Stormwater:** Project construction shall adhere to the requirements of Article 4.1 of the San Francisco Public Works Code (supplemented by Department of Public Works Order No. 158170), which incorporates and implements the City's NPDES permit, and the federal CSO Control Policy. The project sponsor shall develop and implement an erosion and sediment control plan to reduce the impact of runoff from a construction site. The plan shall be reviewed and approved by the City prior to implementation, and the City shall conduct periodic inspections to ensure compliance with the plan.	4	4
4.3.8: Water Supply	None	1	1
4.3.9: Public Safety	None	1	1
4.3.10: Open Space and Recreation	None	2	2
4.3.11: Transportation	None	1	1
4.4: Natural Features			
4.4.1: Water Resources	None	1	1
4.4.2: Surface Water	None	1	1
4.4.3: Unique Natural Features and Agricultural Lands	None	1	1
4.4.4: Vegetation and Wildlife	**Mitigation Measure 1.2.2, Biological Resources:** The project sponsor shall complete all demolition activities, including ground clearing, grading, and removal of trees or shrubs, during the non-breeding season (August 1st through January 31st). If this is determined to be infeasible, a qualified wildlife biologist shall conduct preconstruction/demolition surveys of all potential special-status bird nesting habitat in the vicinity of the buildings to be demolished no more than two weeks in advance of any demolition activities that would commence during the breeding season (February 1st through July 31st). Depending on the survey findings, the following actions shall be taken to avoid potential adverse effects on nesting raptors and other nesting special-status birds: 1. If active nests of special-status birds are found during the surveys, a no-disturbance buffer zone shall be created around active nests until a qualified biologist determines that all young have fledged. The size of the buffer zones and types of construction	4	4

Legend: 1 = No Impact Anticipated; 2 = Potentially beneficial; 3 = Potentially adverse; 4 = Requires mitigation; 5 = Requires project modification;

TABLE 1-2 (Continued)
SUMMARY OF ENVIRONMENTAL ASSESSMENT CHECKLIST AND OTHER FACTORS

Effect	Mitigation Measures	Proposed Project	Preservation Alternative
4.4: Natural Features (cont.)			
4.4.4: Vegetation and Wildlife (cont.)	activities restricted within them shall be determined through coordination with the California Department of Fish and Game (CDFG), taking into account factors such as the following: a) Noise and human disturbance levels at the project site and the nesting site at the time of the survey and the noise and disturbance expected during the construction activity; b) Distance and the amount of vegetation or other screening between the project site and the nest; c) Sensitivity of individual nesting species and behaviors of the nesting birds. 2. If preconstruction/demolition surveys indicate that no nests of special-status birds are present or that nests are inactive or potential habitat is unoccupied, no further mitigation is required. 3. Preconstruction/demolition surveys are not required during the non-breeding season (August 1st through January 31st) for demolition activities including ground clearing, grading, and removal of trees or shrubs. Furthermore, demolition and/or construction activities commencing during the non-breeding season and continuing into the breeding season do not require surveys (as it is assumed that any breeding birds taking up nests would be acclimated to project-related activities already under way). However, if trees and shrubs are to be removed during the breeding season, the trees and shrubs shall be surveyed for nests prior to their removal, according to the survey and protective action guidelines 1a though 1c, above. Nests initiated during demolition or construction activities are presumed to be unaffected by the activity, and a buffer is not necessary. Destruction of active nests of special-status birds and overt interference with nesting activities of special-status birds shall be prohibited. Trees and shrubs that have been determined to be unoccupied by nesting special-status birds may be removed as long as they are located outside of any buffer zones established for active areas. The “Sacred Palm” shall be replanted on the project site upon completion of construction activities.		
4.5: Other Factors			
4.5.1: Flood Disaster Protection Act	None	N/A	N/A
4.5.2: Coastal Barrier Resources Act / Coastal Barrier Improvement Act	None	N/A	N/A
4.5.3: Airport Runway Clear Zone Disclosure	None	N/A	N/A

Legend: 1 = No Impact Anticipated; 2 = Potentially beneficial; 3 = Potentially adverse; 4 = Requires mitigation; 5 = Requires project modification;

CHAPTER 2.0
Proposed Action and Alternatives

2.1 Statement of Purpose and Need for the Proposal

[40 CFR 1508.9(b)]

2.1.1 Housing Needs

The Proposed Action is the approval of a request for funds subject to regulation by 24 CFR Part 58. The project sponsor, 55 Laguna L.P., is proposing to use the requested funds for the development of senior housing on a portion of the site of the San Francisco State Teachers' College, which is a historic district listed on the National Register of Historic Places. The senior housing would be developed in conjunction with housing by Alta Laguna LLC on the remainder of the site. The San Francisco State Teachers' College is located at 55 Laguna Street, San Francisco, CA. The housing development is intended to help close the gap between supply and demand for both low and moderate income housing in San Francisco.

The availability of housing, particularly affordable housing, is an ongoing concern in the San Francisco Bay Area. The regional council of governments, the Association of Bay Area Governments (ABAG), projects that at least 40 percent of new housing demand will be from low- and very low-income households (households earning less than 80 percent of area median income), and another 17 percent affordable from households of moderate means (earning between 80 and 120 percent of area median income). To conform to California State Senate Bill 375, which mandates sustainable development with a focus on urban areas, ABAG calculates that the City and County of San Francisco (CCSF) would need to add 101,720 new units to its total housing supply by the year 2035.

CCSF policies call for increased development of affordable housing in the city. The General Plan's Housing Element states, "Affordable housing is the most salient housing issue in San Francisco and the Bay Area. Housing Element objectives and policies direct the city to meet that demand. For example, Policy 1.1 states that the city shall "plan for the full range of housing needs in the City and County of San Francisco, especially affordable housing." Policy 1.10 calls for the city to "support new housing projects, especially affordable housing, where households can easily rely on public transportation, walking and bicycling for the majority of daily trips."

CCSF's Market-Octavia Plan, which was adopted by the Board of Supervisors in 2008, calls for increased residential uses in the project site vicinity. Objective 2.2 states that CCSF shall

"encourage construction of residential infill throughout the plan area." Objective 2.4 calls for CCSF to "provide increased housing opportunities affordable to households at varying income levels." In addition, the Market-Octavia Plan states that any redevelopment of the project site should provide affordable housing balanced with other uses to meet the needs of the surrounding area. Specifically, Policy 6.2.3 states, "Any future reuse of the UC Berkeley Laguna Campus [the project site] should balance the need to reintegrate the site with the neighborhood and to provide housing, especially affordable housing, with the provision for public uses such as education, community facilities, and open space."

The 55 Laguna project is designed to accommodate a portion of the demand for new housing close to downtown that is near transit, jobs, retail services, cultural institutions, and regional transportation. The Proposed Action would provide moderate-density housing near downtown and accessible to various modes of public transit, thereby helping the City meet the objectives of the Housing Element of the General Plan to construct additional residential units in established neighborhoods that will contribute to the City's housing supply. The Proposed Action would contribute 440 units toward the ABAG-projected housing need. One hundred and ten of these units would be affordable to very-low income seniors, and another 50 of these units would be restricted as affordable to households earning 55 percent of Area Median Income.

2.1.2 Project Sponsor Objectives

The objectives of Alta Laguna, LLC and 55 Laguna, L.P., are:

1. Provide moderate-density housing near downtown and accessible to various modes of public transit, thereby implementing the objectives of the General Plan Housing Element to construct additional residential units in established neighborhoods that will contribute significantly to the City's housing supply.

2. Provide a variety of housing types for a broad range of households, including studio, one-bedroom and multi-bedroom units and including below-market-rate units pursuant to the inclusionary affordable housing requirements of Sections 315-315.9 of the Planning Code.

3. Develop a mixed-use project that is generally consistent with the objective and policies of the Market Octavia Better Area Plan and with the Planning Department's Policy Guide to Considering Reuse of the University of California Berkeley Extension Laguna Street Campus (December 2004).

4. Provide residential units in several different buildings, including both adaptive re-use of portions of the existing on-site building and in new construction, in order to provide a variety of architectural expressions and lifestyle choices.

5. Provide independent living units welcoming to the lesbian, gay, bisexual, and transgender (LGBT) senior communities, combined with comprehensive social, educational, and health services for LGBT seniors both in residence and from the community at large.

6. Seismically retrofit and adaptively reuse the majority of the existing buildings on the site where feasible.

7. Reintroduce the former Waller Street right of way as a publicly accessible way through the site to subdivide the site into two development blocks and provide publicly accessible open space.

8. Create neighborhood serving retail space and community serving space to serve the needs of both project residents and area neighbors.

9. Create a series of public, semi-public and private open spaces at the ground level of the project to provide neighborhood open space amenities and pedestrian access through the site, provide protected internal courtyards for use by residents, and to break up the mass of the project into several discrete buildings.

10. Provide adequate on-site parking primarily in underground garages to meet the needs of the project and UCSF Dental Clinic, while allowing residents the option of not having a parking space should they not desire one.

11. Provide space for an on-site car sharing operation to serve project residents and neighbors.

12. Construct a high-quality residential mixed-use development that produces a reasonable return on investment for the project sponsors and their investors and is able to attract both equity investors, construction, and permanent financing.

2.1.3 University of California Objectives

The objectives of the Regents of the University of California include the following:

1. Convey the property to a development team qualified to develop the property in a financially feasible manner that contributes to the quality of life of the surrounding neighborhood and the City of San Francisco.

2. Retain the existing UCSF Dental Clinic.

3. Fulfill fiduciary responsibility to receive fair market value return on University assets in order to support the University's academics mission.

2.2 Description of Proposal

[24 CFR 58.32, 40 CFR 1508.25]

As shown in **Figure 1**, the 5.8-acre project site is an approximately two-block area bounded by Haight Street to the north, Laguna Street to the east, Hermann Street to the south, and Buchanan Street to the west, in the City's Upper Market and Hayes Valley neighborhoods at the former University of California Berkeley Extension Campus. (All figures are presented at the end of the chapter). The site slopes downward from northwest to southeast at a slope of approximately 10 percent and is divided into two terraces. The now-unoccupied campus buildings include Woods Hall, Woods Hall Annex, Richardson Hall including the administration wing, and Middle Hall. A fifth building, located on the southwestern corner of the site at the intersection of Hermann and Buchanan Streets, is a two-story, approximately 18,000-square-foot dental clinic occupied by the University of California San Francisco (UCSF) Dental School. The Proposed

Action would not affect the dental clinic building. The land owner for the entire site is the Regents of the University of California, which proposes to ground-lease the project site to the project sponsors: 55 Laguna, L.P., and Alta Laguna, LLC.

The Proposed Action, approval of Part 58 funding, would be used to fund in part the demolition and renovation of existing buildings and construction of approximately 110 units of affordable senior housing as part of the larger development totaling 440 dwelling units. In total, the development would comprise about 490,000 square feet in ten buildings, seven of which would be new (six residential and one amenities building). Redevelopment of the overall project site would also include construction of two underground parking garages provides a total of 310 spaces over about 142,000 square feet. The completed site would include a 28,000-square-foot linear park on the former Waller Street right-of-way, as well as other open space, internal streets, and subsurface parking (see **Figure 2**). About 2,400 square feet of retail space would be located on the ground floor at the southeast corner of the site, on Laguna Street.

The proposed undertaking includes demolishing the existing Administration Wing of Richardson Hall (Richardson Hall Annex) and Middle Hall, the partial removal of the Laguna Street retaining wall, and the adaptive reuse of three existing City Landmark buildings: Woods Halls, Woods Hall Annex and Richardson Hall.

2.2.1 Alta Laguna LLC Development

Alta Laguna, LLC, would develop approximately 280 market-rate and 50 inclusionary affordable rental units (approximately 360,000 square feet). This would be accomplished by the demolition of Middle Hall and the construction of five new residential buildings, as well as renovation of Woods Hall. Alta Laguna, LLC would also adaptively reuse Woods Hall Annex as a Community Center. **Table 2-1** lists preliminary dwelling units and total square feet per building.

TABLE 2-1
ALTA LAGUNA LLC DEVELOPMENT CHARACTERISTICS

Building	New or Renovation	Studio	1 BR	2 BR	3 BR	Total D.U.	Square Feet
1A	New	13	21	22		56	57,433
1B	New	18	20	23		61	58,644
2C	New	9	27	20		56	73,231
2D	New	14	27	15		56	67,794
2E	New	18	38	22	2	80	79,469
Amenities Building	New	Residential Community Building				0	6,445
Woods Hall	Renovation	4	17			21	24,790
Woods Hall Annex	Renovation	Community Center				0	12,641
Total	**--**	**76**	**150**	**102**	**2**	**330**	**380,447**

SOURCE: BAR Architects, August 2012

Building 1A would be approximately situated in the location of the existing dental clinic parking lot. Building 1B would be located across Waller Park (described below), south of the existing Woods Hall. Given the downward slope of the project site from west to east, 4 stories (about 43 feet) would be exposed facing Buchanan Street, and 6 stories (about 67 feet) would be exposed facing the Mews, which would be the internal east-west street to be built within the project site. Elevation renderings are shown in **Figures 3** through **9**.

Buildings 2C and 2D would be on the eastern side of the Mews, between Richardson Hall and Woods Hall Annex. One building would be located on each side of Waller Park. Due the slope of the site, four stories would be exposed on the western elevation, and six stories would be exposed on the eastern elevation. Building 2E would be constructed along Laguna Street between Waller Park and Haight Street. Five stories would be exposed to the west, and six stories (about 68 feet) would be exposed to the east, facing Laguna Street.

2.2.2 Senior Development

55 Laguna L.P, a partnership of Mercy Housing California and Openhouse, would develop the senior housing portion of the project ("Senior Development"). The Senior Development would include demolition of the northern "administration" wing of Richardson Hall. The development would include construction of a new 63,000-square-foot building at the corner of Laguna and Waller Streets. The Openhouse Building would comprise 70 residential units and an approximately 8,600-square-foot senior activity center (plus ancillary spaces), with dining services. Due to the slope of the site, the building would be 5 stories on the western elevation and 7 stories (about 74 feet) on the eastern elevation, along Laguna Street. The three-story, approximately 47,800-square-foot Richardson Hall would be renovated to comprise 40 residential units, an approximately 2,700-square-foot office for Openhouse operations, and an approximately 2,400-square-foot retail space at the corner of Laguna and Hermann Streets. **Table 2-2** lists preliminary dwelling units and total square feet by use per building.

TABLE 2-2
SENIOR DEVELOPMENT CHARACTERISTICS

Building	New or Renovation	Studio	1 BR	2 BR	Total D.U.	Square Feet
Openhouse	New	1	68	1	70	54,983
Openhouse	New	Senior Activity Center				8,615
Richardson Hall	Renovation	10	27	3	40	41,961
Richardson Hall	Renovation	Openhouse Offices				2,717
Richardson Hall	Renovation	Ground-Floor Retail Space				2,410
Total	**--**	**7**	**97**	**6**	**110**	**110,686**

SOURCE: BAR Architects, August 2012

Both buildings would be managed by Mercy Housing and the senior center would be operated by Openhouse, which would provide social, educational, and health services to the LGBT senior community, including both residents of the Openhouse building and others not residing on-site.

The Senior Development would be partly funded by the San Francisco Mayor's Office of Housing (MOH), whose funds would consist of proceeds from the San Francisco Hotel Tax and Inclusionary Housing Ordinance in-lieu payments. It is anticipated that the financing of the Senior Development would also include capital and operating funds from the HUD Section 202 Housing for the Elderly ("HUD 202") program. Senior units would be targeted toward very-low-income residents, regardless of sexual orientation. Openhouse would undertake outreach and support to the LGBT community to aid in their applications for residency in these units.

Rehabilitation and Demolition

Rehabilitation of Woods Hall, Woods Hall Annex, and the main portion of Richardson Hall would be primarily restricted to the interior of these buildings, without substantial alterations to their exterior facades or rooflines, with the possible exception of new entrances from the interior courtyards and new openings in Woods Hall and/or Woods Hall Annex on the façade facing Haight Street and new window openings in the retaining wall on the Laguna façade of Richardson Hall.

The portion of Richardson Hall to be demolished would be the single-story administration wing, which sits atop the retaining wall facing Laguna Street near Waller Street. In addition, as noted above, Middle Hall would be demolished to accommodate the proposed program. The existing retaining wall along Laguna Street between Waller and Haight Streets would also be demolished.

Landscaping and Open Space

The project site comprises 141 trees, inclusive of street trees. Most on-site trees would be removed to allow for implementation of the Proposed Action. The project would include new landscaping as well as several types of open space. Private and common open spaces would be provided through patios, decks and porches at individual units and courtyards. The project site would also offer a privately owned though publicly accessible open space extending from the upper terrace at the intersection of Waller and Buchanan Streets through the site to the corner of Waller and Laguna Streets, effectively re-introducing Waller Street through the site as a 28,000-square-foot publicly accessible open space (referred to as Waller Park). Street trees would be planted along all four exterior streets as well as within the internal portion of the site. The project would include landscaping throughout in the form of trees and shrubs. A large Canary Palm behind Woods Hall—called the "Sacred Palm" by former students—would be boxed, stored during construction and replanted adjacent to Woods Hall after construction. A new 10,600-square-foot community garden accessible to the public would be provided on the northern portion of the site.

Parking

The project would provide a total of approximately 310 on-site vehicular parking spaces and 125 bicycle parking spaces in two garages. These garages would provide spaces for the Alta Laguna LLC Development residents, USCF Dental Clinic patrons, and patrons of car-sharing services. Garage 1 would be accessible to residents from Buchanan Street on the western façade of Building 1A, and it would extend northeastward beneath Building 1A, Waller Park, and Building 1B. Elevators would allow for direct access into the interior Buildings 1A and 1B, but units fronting onto Buchannan Street would not have direct garage access. UCSF dental patrons would have a dedicated elevator from Garage 1 to the surface, in close proximity to the dental clinic. Garage 2 would be accessible from Laguna Street on the eastern façade of Building 2E, and it would extend southwestward beneath Building 2D, Waller Park, and Building 2C. Residents of Buildings 2C and 2D would access the garage via elevators, but units in Building 2E fronting onto Haight Street would not have direct garage access. There would not be direct elevator access between the Senior Development Buildings and the parking garages.

Of the 310 spaces parking spaces, 154 would be self-park stacker spaces, 10 spaces would be for car sharing, and 51 spaces would be for the exclusive use of the USCF Dental Clinic. About 125 secure, on-site bike parking spaces would be available throughout the site for use by residents, and additional sidewalk bicycle racks would be available for visitor bicycle parking.

Vehicular and Pedestrian Circulation

Vehicles would be prohibited from entering the project site, except via the two garage entrances described above. Emergency vehicles would also be permitted to access the site along the Mews (aka Palm Lane), which would be a dedicated pedestrian and cyclist street closed to vehicular traffic. Pedestrians would be able to walk through the length of the former Waller Street right-of-way to reach Buchanan Street or Laguna Street via the proposed Waller Park improvements. In addition, pedestrian walkways would traverse the site and provide entrances at Haight Street just west of Laguna Street, Laguna Street just south of Haight Street, Laguna Street between Hermann Street and Waller Park, and Buchanan Street between Waller Park and Haight Street.

Construction Schedule and Phasing

Project construction would occur in phases, lasting approximately 48 months. The Alta Laguna LLC Development portion would be constructed over a period of 30 months, and the Senior Development would lag behind construction of the Alta Laguna LLC Development because of financing requirements. The Proposed Action would include excavation to a depth of between 12 to 20 feet for the construction of the underground parking garages and would remove approximately 40,000 cubic yards of soil. The proposed buildings would be constructed on a concrete mat foundation that would not require pile driving but may require rock hammering. Most construction materials, storage and construction worker parking would be provided on-site.

2.3 Existing Conditions and Trends

[24 CFR 58.40(a)]

The 5.8-acre site is owned by the Regents of the University of California and was the former site of the University of California Berkeley Extension Campus. The Regents propose to ground-lease the project site to the project sponsors: 55 Laguna L.P. and Alta Laguna LLC.

The site is an area of two contiguous city blocks bounded by Haight Street to the north, Laguna Street to the east, Hermann Street to the south, and Buchanan Street to the west, in the City's Upper Market and Hayes Valley neighborhoods. The area is an established, centrally-located urban neighborhood.

The two-block site is larger than the other blocks in the neighborhood and breaks the neighborhood street grid. The perimeter of the site is characterized by long, tall stepped retaining walls ringing the south, east, north and portions of the west sides of the site. The walls cut the site off from the surrounding streets. A large portion of the site is covered with flat surface parking areas which hide the characteristic San Francisco topography of the site. The basic topography of the site falls approximately 70 vertical feet from the northwest corner to the southeast corner. The campus was vacated by the University of California in 2002 and is now unoccupied, except for day use parking. The vacant, paved and walled two block site is effectively isolated from the surrounding neighborhood.

The site contains five existing buildings totaling 119,910 square feet (sq. ft.), four of which were used until 2002 by UC-Berkeley as an extension campus and by the French-American International School (FAIS). These now-unoccupied buildings include Woods Hall, Woods Hall Annex, Richardson Hall, and Middle Hall. The fifth building, located on the southwestern corner of the site at the intersection of Hermann and Buchanan Streets, is a two-story dental clinic approximately 18,000 sq. ft. in size that is currently occupied by the University of California San Francisco (UCSF) Dental School. This modern-style building, built in 1968, is separated from the street by a drop in grade elevation requiring a bridge from Buchanan Street for pedestrian access. The proposed development would not affect the dental clinic building.

The project site was listed as a Historic District on the National Register of Historic Places as San Francisco State Teachers' College on January 7, 2008. Three of the existing buildings on the site—Richardson Hall (excluding the administration wing), Woods Hall and Woods Hall Annex—have been designated San Francisco City Landmarks.

The majority of the existing buildings occupy the periphery of the site on the upper and lower terraces, with surface parking generally in the center of the site (see **Figures 10** and **11**). All of the former UC Extension buildings on the site were constructed between 1924 and 1935 as the campus of the San Francisco State Teachers College (now San Francisco State University), which traded the property to the University of California when it relocated to its current campus on 19th Avenue in the 1960s. UC has no plans to renovate these buildings or otherwise reactivate the project site. The

facilities have not been upgraded to meet current accessibility standards or seismic standards. The buildings are closed and their condition has deteriorated since the Extension center was closed.

- Woods Hall (City Landmark 258) was constructed in 1926. It is a two-story, L-shaped building located at the northwestern corner on the upper terrace of the site along Buchanan and Haight Streets.

- Attached to Woods Hall is Woods Hall Annex (City Landmark 259), constructed in 1935. It is located along Haight Street and positioned on the lower terrace.

- Richardson Hall (City Landmark 257, excluding Administration Wing) was constructed between 1924 (Administration Wing) and 1930 (Main Building). It is a one and three-story, L-shaped building located on the lower terrace of the site at the corner of Hermann and Laguna Streets. Within Richardson Hall on its Laguna Street elevation is a two-story auditorium and an attached single-story administration wing that extends north of the main portion of the building, along Laguna Street. Photos of the interior of the Administration Wing are included in **Figure 12**.

- Middle Hall was originally built as a gymnasium in 1924 with classroom and office space added later. It is a one-and-a-half- to two-and-a-half-story building located behind (east of) the west wing of Woods Hall. A photo of the interior of Middle Hall is included in **Figure 12**.

The remainder of the site is occupied by 278 off-street parking spaces contained in three surface lots. One parking lot is located on the upper terrace between the dental clinic and Woods and Middle Halls, accessible from Buchanan Street. This lot has about 50 spaces, which are currently used primarily by the dental clinic. The remaining 228 parking spaces are contained within two lots on the lower terrace accessed from Laguna Street; one lot is behind Richardson Hall and the other is located in the northeastern section of the project site at the corner of Haight and Laguna Streets. These lots currently provide daytime parking for UCSF employees who work at other UCSF locations off-site. Some parking spaces on the project site are also leased to employees at California Pacific Medical Center (CPMC), Davies Campus. Despite UC's security efforts including UC security patrol, and the day use of the site as a parking lot for UCSF students and faculty, the site is constantly vandalized with graffiti and dumping. Padlocks on the buildings are routinely cut enabling illegal entry. Significant damage from water intrusion is evident.

The site is located just to the north of Market Street and one block west of Octavia Boulevard. Market Street is the City's preeminent transit and shopping street, with a wide array of transit options and commercial variety. In the blocks immediately surrounding the site to the east, north and west there is a mix of small to medium scale residential development ranging from single-family dwellings to seven-storey multiple-unit apartment buildings and a large-lot, 110 housing development. One block to the west of the site is a small neighborhood commercial district with a variety of neighborhood serving businesses.[1]

[1] San Francisco Planning Department, *A Policy Guide for Considering Reuse of the University of California Berkeley Extension Laguna Street Campus*, Better Neighborhoods Program, December 2004.

Lying mostly surrounded by the Hayes Valley Historic District, the nearby residential areas are characterized by a high degree of architectural significance and quality generally consisting of Victorian and Edwardian-style buildings. Multi-family residential buildings ranging from two to seven stories in height and single-family attached row houses, ranging from 2 to 3 stories in height, are the predominant uses on the streets immediately surrounding the project site. Other older structures (such as the US Mint and UC Berkeley Extension Buildings), while not contributing to the historic district, are considered meritorious in their own right. Other significant nearby spaces are Koshland Park, half a block to the north, and Rose 'mini-park' to the northeast. The site is well served by neighborhood-serving businesses including several delis, a supermarket, retail stores, restaurants, and various other shops, all within a two-block radius.[2]

Institutional uses in the immediate vicinity include the Healthright 360 Facility, located along Haight Street across from Woods Hall Annex; the University of California San Francisco AIDS Health Project building, located to the east of the project site on Laguna Street across from Richardson Hall; and the U.S. Mint, which sits atop a rocky promontory at the intersection of Buchanan and Hermann Streets to the northwest of the project site.

There are two primary patterns of land use surrounding the site: The Hayes Valley residential area, and the mix of commercial and residential uses along Market Street. Larger buildings in this area range from 4-7 stories and typically have a floorplate of around 3,000-5,000 square feet (approx 40 X 100 feet). Smaller residential structures range from the truly tiny (1000 square foot two-and three-story single-family dwellings or duplexes on 1,000 square foot lots along Germania Street) to the city standard 2,500 and 3,000 square foot lots with a mix of single-family, two-family, and multiple-unit buildings at two, three, and four stories.[3]

Notably, auto ownership in both of these areas is low (average .6 cars per household, approx. 40 percent of households do not own a car), corresponding to a high rate of public transit usage and provides evidence of the very walkable nature of the neighborhood. The intersection of Market and Laguna Streets is an important center of activity for the immediate vicinity, with a large Art Deco apartment building (often called the "Orbit Room building", for the bar that occupies the ground floor at the corner) that marks the corner on Market Street. The site is served by major transit services on Market Street (11 surface buses and streetcars, the Muni metro and the Castro shuttle). The 6 and 71 lines on Haight Street provide an important connection to the west side of the city. Several major public improvements are underway or have been completed in the immediate vicinity, most notably the new Octavia Boulevard, which provides a significant new public space and promenade.[4]

The project site was previously targeted for development by Openhouse and AF Evans Inc. That development, the 55 Laguna Street Mixed Use Project, did not propose the use of federal funds and no federal environmental review was completed.

2 *Ibid.*
3 *Ibid.*
4 *Ibid.*

An Environmental Impact Report (FEIR) for this earlier proposed development was prepared under the California Environmental Quality Act (CEQA) and was certified by the San Francisco Planning Commission on January 17, 2008. The project evaluated in the FEIR included approximately 430,800 square feet (sq. ft.) of residential space, up to 5,000 occupied sq. ft. of retail space, approximately 10,000 sq. ft. of community facility space, and approximately 127,360 sq. ft. of parking (310 off-street parking spaces) in seven new buildings and two underground garages on the project site on the former University of California, Berkeley Extension campus. The project included up to 450 residential units constructed in seven new buildings and three rehabilitated buildings (Woods Hall, Woods Hall Annex, and Richardson Hall). Ground floor retail was proposed to be located at the corner of Laguna and Hermann streets in the renovated Richardson Hall, and community space was proposed in the existing Woods Hall Annex. Six of the proposed seven buildings were proposed to be 40-50 feet in height, and a seventh building (the Openhouse building) would be approximately 85 feet in height. The University of California would retain ownership of the land (to be ground leased to the project sponsors), and the existing U.C. San Francisco Dental Clinic at the corner of Hermann and Buchanan Streets would remain in operation and was not part of the approved or proposed project.[5]

The San Francisco Planning Commission (Planning Commission) adopted a conditional use authorization for a planned unit development (PUD) on the site on January 17, 2008 (Planning Commission Motion 17537). At the time the project included 450 total residential units, including 88 units of senior housing. The San Francisco Board of Supervisors (BOS) adopted the CEQA Findings and project approvals including a General Plan amendment, rezoning and enactment of the Laguna, Haight, Buchanan and Hermann Streets Special Use District on April 15, 2008. The overall number of units approved was reduced from the number analyzed in the FEIR to 418-440 total residential units, including between 88 and 110 senior units (BOS Ordinances 66-08, 67-08, and 68-08). On August 4, 2011, the Planning Commission approved Motion 18427 modifying the affordable housing conditions of Motion 17537, to permit a mix of on-site affordable units and payment of an affordable housing fee.[6]

The certification was upheld by the San Francisco Board of Supervisors on March 4, 2008. The Board's approval of the certification was appealed to the California Superior Court Appeal under petition for a Writ of Mandate alleging violations of CEQA. The petition was denied by the Superior Court. That judgment was appealed to the California Court of Appeals. The Court of Appeals affirmed the Superior Court judgment denying the petition and held that the City's finding was supported by substantial evidence.[7]

Alta Laguna LLC purchased AF Evans Inc.'s, the previous project sponsor, interest in the project. The new developers—Mercy Housing, Openhouse and Alta Laguna LLC—propose a modified

5 San Francisco Planning Department, *Addendum to Environmental Impact Report: 218 Buchanan Street, AKA 55 Laguna Street, Case No. 2012.033E*, May 8, 2012, page 1.

6 *Ibid*, page 2.

7 Save the Laguna Street Campus v. City and County of San Francisco et al., A.F. Evans Development, Inc. et al., A124531, Court of Appeal of California, First Appellate District, Division Five. LexisNexis, May 25, 2010.

project using federal funds which gave rise to this EA. This modified project is described in **Section 2.3**.

On May 8, 2012, the San Francisco Planning Department finalized an Addendum to the previously prepared Environmental Impact Report, which concluded that the analyses conducted and the conclusions reached in the Final EIR certified on January 17, 2008, remain valid under the modified project.

On May 16, 2012, the San Francisco Historic Preservation Commission approved a Certificate of Appropriateness for the proposed alterations to Richardson Hall, Woods Hall, and Woods Hall Annex. This approval was appealed on June 15, 2012. On July 31, 2012, the Board of Supervisors affirmed the approval of the Certificate of Appropriateness.[8]

On August 16, 2012, the San Francisco Planning Commission approved a Conditional Use Authorization as a modified PUD for the Project Proposal.[9]

In the absence of the development of the project or its alternatives the condition of the site can be expected to continue to deteriorate from burglary, vandalism, graffiti, and delayed maintenance. Continued deterioration would result in further degradation of historic resources without any mitigation. Housing needs for the targeted markets would not be met and could result in increased demands on low- and moderate-income housing in other areas of the city. The campus would remain isolated from the surrounding neighborhoods.

2.4 Development of Alternatives

NEPA and its implementation regulations require that federal agencies identify and assess reasonable alternatives to the Proposed Action that would avoid or minimize adverse impacts (40 CFR 1500.2(e)).

The San Francisco Mayor's Office of Housing reviewed several alternatives with the aim of fulfilling the purpose and need of the proposed project. The alternatives reviewed are presented below. The Preservation Alternative is carried forward for analysis in Chapters 3 and 4.

2.4.1 No Action Alternative

[24 CFR 58.40(e)]

This alternative would entail no changes to the project site. The former UC Extension buildings on the project site would remain locked and vacant, with the exception of the UCSF Dental Clinic, which would continue to operate as a UCSF facility. The parking areas in the center of the site would continue to be used for UC and CPMC Davies parking purposes only. All other portions of the site would remain off-limits to the general public. This alternative assumes that

8 Board of Supervisors, City and County of San Francisco, Meeting Minutes – Draft, Tuesday, July 31, 2012, Motion 120727, available online: http://www.sfbos.org/ftp/uploadedfiles/bdsupvrs/bosagendas/minutes/2012/m073112.pdf.

9 San Francisco Planning Commission, Meeting Minutes, August 16, 2012.

UC would perform minimal maintenance on the vacant buildings for safety and security purposes, but would not make wholesale improvements or renovations to them.

UC would have the option of selling the property under the No Action Alternative, pursuant to the Stull Act (California Public Contracts Code §§ 10511-10513), which regulates the sale of surplus University of California property. The Stull Act requires that surplus property be sold via closed bid to the highest bidder. Under this alternative, the purchaser could seek entitlements from the City for its preferred use of the property, and the environmental effects of that proposed use would be analyzed at that time.

Given that all existing conditions would remain, there would be no effects on the human environment. The No Action Alternative would avoid adverse effects to historic properties because this alternative would retain Middle Hall and the Administration Wing of Richardson Hall, among other historic resources on the site, and retain the internally focused campus feeling of the site. While some level of minimal building maintenance is assumed under this alternative, the historic property on the subject site could continue to deteriorate as it is currently. Continued deterioration of historic properties could be considered an adverse effect, depending of the level of maintenance and security that UC would provide for the property. Even with continued deterioration of the existing buildings, however, the No Action Alternative would have a non-adverse effect to historic properties when compared with the proposed undertaking.

The No Action Alternative would not achieve the objectives of accommodating a portion of the demand for new housing in proximity to services and amenities. LGBT seniors would not be served by the No Action Alternative. The No Action Alternative would not result in rehabilitation of the project site, and the project site would not be transferred to the development team, contrary to the objective of the Regents of the University of California. Therefore, this alternative was not selected.

Given that, there would be no effects on the human environment, and detailed analysis of the alternative is not provided.

2.4.2 Preservation Alternative

This alternative would retain all buildings on the project site for renovation and adaptive reuse, including Richardson Hall in its entirety, Middle Hall, Woods Hall, Woods Hall Annex, as well as the retaining wall along Laguna Street. This alternative would construct new in-fill residential uses in a manner similar to the proposed undertaking, yet at a reduced size and density. Given that historic buildings on the site would be retained, the overall underground square footage available for vehicular and bicycle parking would be reduced.

Up to 332 residential units (about 79 senior housing units and approximately 253 non-senior units) would be constructed. This alternative would provide 10,000 sq. ft. of community space, to be located entirely within Middle Hall, and up to 5,000 sq. ft. of retail, to be located at the basement (ground floor) level of Richardson Hall. The distribution of studio, one-bedroom, and two-bedroom units would in proportion to the distribution under the Proposed Action.

This alternative would result in five new buildings. The proposed low-income senior housing building would be constructed in a new courtyard immediately west of Richardson Hall, and would be eight stories or approximately 80 feet in height. All other new buildings would be between three to four stories, or a maximum of approximately 40 feet in height. All historic properties on the site would be upgraded for ADA and seismic code compliance, and all renovations efforts would be consistent with the guidance provided by the Secretary of the Interior's Standards for Rehabilitation. Richardson Hall including the Administration Wing, Woods Hall, and Woods Hall Annex, would be adaptively reused for residential purposes. Middle Hall, specifically, would be retained for use as a community center. A conceptual site plan is shown in **Figure 13**.

UC's price for the site was set and does not change regardless of the scale of development, and it has been determined that financial feasibility would be achieved at 440 units of housing. Of all buildings on the site, the renovation of Richardson Hall Administration Wing required the highest contribution on a per square foot basis of about $245 to $250 just to address the seismic retrofit required and not including any other upgrades to meet other building code and design requirements.[10,11] The Project Sponsors did not find that the renovation of the Administration Wing would be financially feasible.

A.F. Evans retained Seifel Consulting, Inc., (Seifel) to provide an independent financial evaluation of this and other alternatives studied in the 2008 EIR.[12] This evaluation was informed by the 2006 *San Francisco Inclusionary Housing Study*.[13] The report explained the difficulty in financing both this Preservation Alternative and the Modified Preservation Alternative (discussed below), and the Court of Appeal of California found that the report is "the type of expert opinion that can provide substantial evidence for the City's infeasibility finding" of preservation alternatives.[14] In August 2012, Seifel Consulting, Inc., prepared an updated financial evaluation of the current proposed action and alternatives and found that the proposed action "continues to be the only financially viable development program."[15]

The City also found that the Preservation Alternative is infeasible on economic grounds.[16] Since that time, the condition of the housing market only increases the infeasibility of the preservation alternative. It lacks sufficient profit potential to attract the type of equity investment necessary to fund the development. Given today's funding status for affordable housing (the City recently lost 50 percent of its funding sources when its Redevelopment Agency was eliminated by action of

10 HolmesCully. *Richardson & Woods Hall Seismic Review*, prepared for Mercy Housing & A.F. Evans, Project No. 04033.10, June 14, 2004.
11 HolmesCully. Letter to Mercy Housing RE: Richardson & Woods Hall Seismic Review – Report Follow Up, Project No. 04033.10, January 26, 2012.
12 Seifel Consulting, Inc., Memorandum: Review of 55 Laguna Street Project and Project Alternatives, to San Francisco Planning Department, February 25, 2008.
13 Keyser Marston Associates, Inc., *Summary Report: Inclusionary Housing Program, San Francisco, Sensitivity Analysis*, 2006.
14 Save the Laguna Street Campus v. City and County of San Francisco et al., A.F. Evans Development, Inc. et al., A124531, Court of Appeal of California, First Appellate District, Division Five. LexisNexis, May 25, 2010.
15 Seifel Consulting, Inc. Memorandum: Review of 55 Laguna Street Project and Project Alternatives, to San Francisco Planning Commission, August 15, 2012.
16 San Francisco Planning Commission, Case No. 2004.0773E!CMTZR, 55 Laguna Street, Motion No. 17533, Exhibit C, California Environmental Quality Act Findings, January 17, 2008.

the state legislature, as well as recently lost 50 percent of federal HOME and CDBG funding), it is important that the construction of affordable housing be as cost-efficient as possible.

An analysis of the relative environmental effects of this alternative is provided in Chapters 3 and 4.

2.4.3 No Retail Alternative

Under this alternative, the Proposed Action would not include a retail component. The 2,400-square-foot retail space at the corner of Laguna and Hermann Streets would not be constructed. In its place, the Openhouse offices, common areas, and average size of residential units of the Senior Development component of the Proposed Action could slightly expand. However, their expansion would not result in an increase in the number of residential units, or an increase in the expected office employment at the project site. The remainder of the building program would be the same as under the Proposed Action—this alternative would include the demolition of Middle Hall and the Richardson Hall Administration Wing, as well as construction of new buildings and renovation of remaining buildings to provide 440 units of housing, 110 of which would be targeted to very-low-income seniors. The design of the ground floor of the Richardson Hall Building, along Laguna Street, would be similar to the design under the Proposed Action.

Given the demolition of Middle Hall and the Richardson Hall annex, this alternative would result in an adverse effect on historic resources, similar to the Proposed Action. All other effects, however, would be substantially similar to those of the Proposed Action, except for transportation effects. The trip generation and travel demands from retail uses would be removed from the project, thereby resulting in an incremental decrease in total trip generation and vehicle trips. However, this reduction would be minor compared to the remaining trips generated by the other project components.

Given that this alternative would not reduce or avoid the Proposed Action's adverse effect on historic resources, detailed analysis of the alternative is not provided.

2.4.4 A.F. Evans Project Alternative

As explained in Section 2.3, the project site was previously targeted for development by Openhouse and AF Evans Inc. The project evaluated in the 2008 FEIR included approximately 450 residential units, up to 5,000 occupied sq. ft. of retail space, approximately 10,000 sq. ft. of community facility space, and approximately 310 off-street parking spaces in seven new buildings and two underground garages. Woods Hall, Woods Hall Annex, and Richardson Hall would have been rehabilitated.

The environmental effects of this alternative would be substantially similar to the effects of the Proposed Action. Like the Proposed Action, this alternative would include the demolition of Middle Hall and the administration wing of Richardson Hall. Therefore, it would result in similar effects on historical resources. This alternative would include slightly more residential units and retail space than the Proposed Action, which could result in increased effects to traffic, noise, air quality, and utilities and services. However, the incremental increase in intensity of uses would not substantially affect these factors.

Given the similarities between this alternative and the Proposed Action, a detailed analysis of this alternative is not provided in Chapters 3 and 4.

2.4.5 Modified Preservation Alternative

During the state environmental review of the previous development proposal for the project site (described in **Section 2.4.4**), a Modified Preservation Alternative (MPA) was submitted for analysis. The MPA would retain all existing buildings at the site and increase the total number of residential units to 450 by constructing additional infill units, assumed to be in six new midrise buildings, including 110 affordable senior units and 68 inclusionary affordable units. One new building constructed near the center of the site, just north of Waller Park, would include 40 percent of the units.

The Middle Hall gym would be renovated for community use, office and storage area, and the Richardson Hall Administration Wing would be used for senior activities. The alternative would require some modifications to existing features, such as the creation of openings in the Laguna Street retaining wall to permit access to parking and housing. The alternative would provide 321 parking spaces.

The breakdown of units into studio, one-bedroom, and two-bedroom units was not provided, but it is assumed that the allocation would be proportional to that of the Proposed Action.[17] The alternative would include 5,000 square feet of retail space, 10,000 square feet of community space, and 41,000 square feet of public open space.

The Seifel Consulting, Inc., 2008 financial evaluation of alternatives, described above in **Section 2.4.2**, concluded that the MPA was financially infeasible because it would not provide enough economic return to support financing, primarily due to the higher cost of the mid-rise construction required by the MPA.[18] The Court of Appeal of California found that the Seifel Report is an expert opinion that can be used to support infeasibility findings.[19] The 2012 financial evaluation also concluded that the MPA was not financially feasible.[20]

The MPA, or any other preservation-related mix components of the Proposed Action and the Preservation Alternative (i.e., retaining Middle Hall, retaining Richardson Hall Administration Wing, reducing modification of one or more buildings to remain) would have effects that would fall within the range of effects for the Proposed Action and the Preservation Alternative, as analyzed in Chapters 3 and 4 of this EA. Therefore, this alternative is not analyzed in detail in this document.

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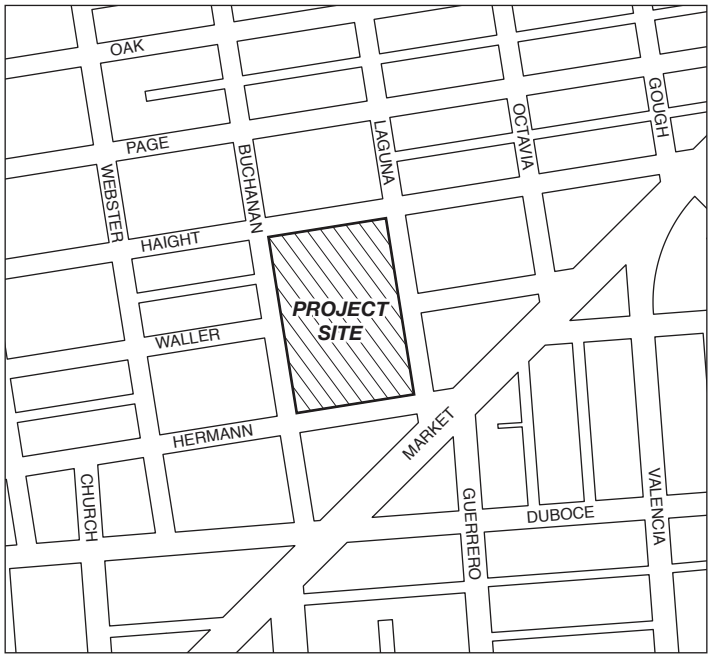
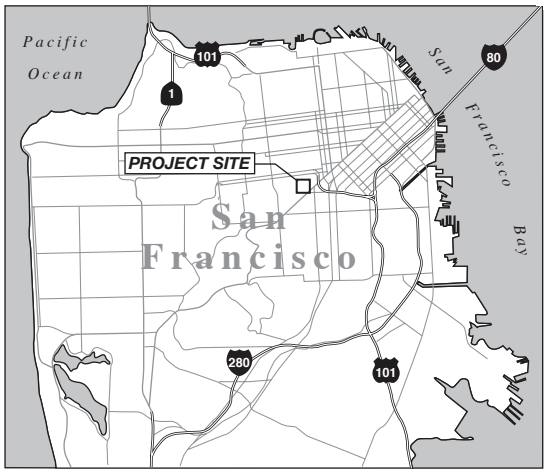
17 Save the Laguna Street Campus, personal communication with Mayor's Office of Housing, July 25, 2012.

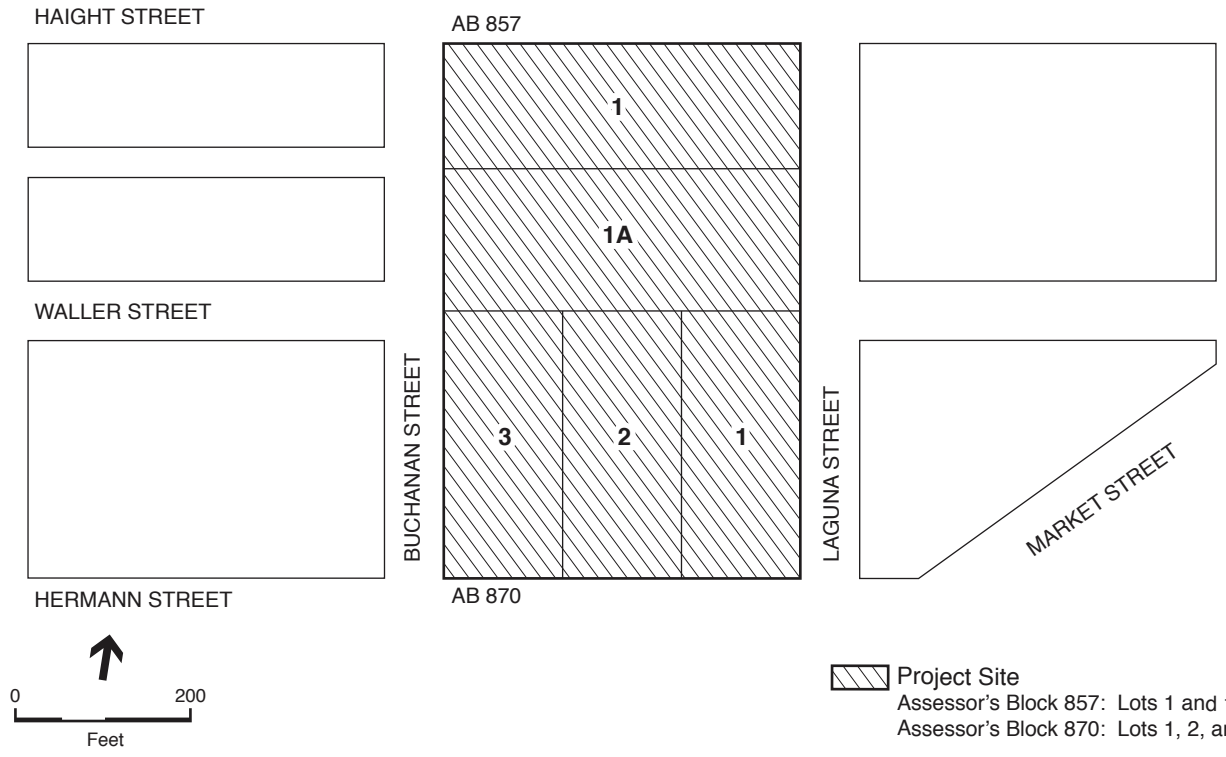
18 Seifel Consulting, Inc., Memorandum: Review of 55 Laguna Street Project and Project Alternatives, to San Francisco Planning Department, February 25, 2008. Generally, the Building Code permits a maximum of four stories of residential units in wood-frame construction; taller buildings are generally built of concrete.

19 Save the Laguna Street Campus v. City and County of San Francisco et al., A.F. Evans Development, Inc. et al., A124531, Court of Appeal of California, First Appellate District, Division Five. LexisNexis, May 25, 2010.

20 Seifel Consulting, Inc. Memorandum: Review of 55 Laguna Street Project and Project Alternatives, to San Francisco Planning Commission, August 15, 2012.



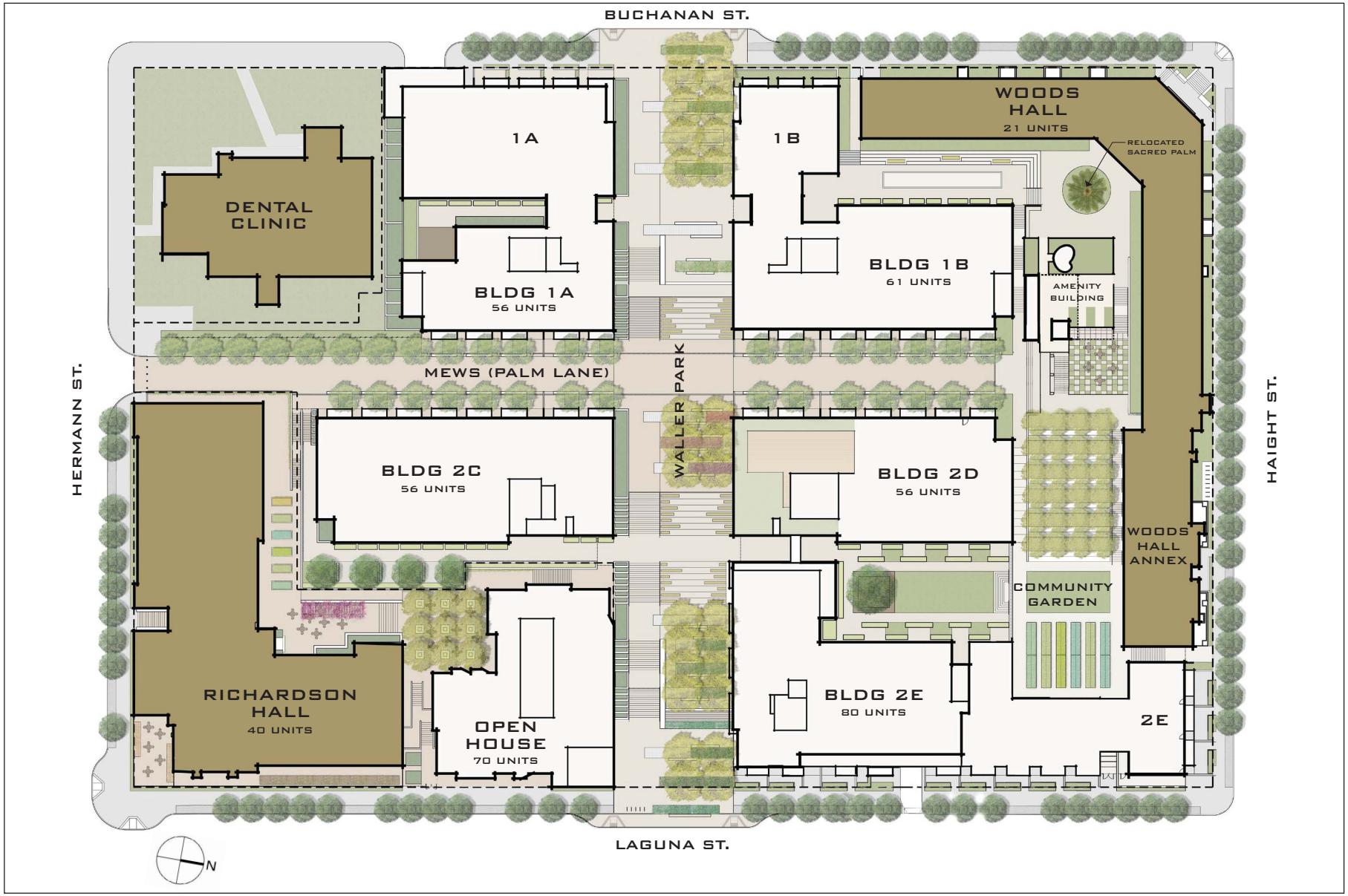




SOURCE: ESA

55 Laguna . 211872

Figure 1
Project Location



SOURCE: BAR Architects

55 Laguna . 211872

Figure 2
Project Site Plan

55 Laguna . 211872

SOURCE: BAR Architects

Figure 3

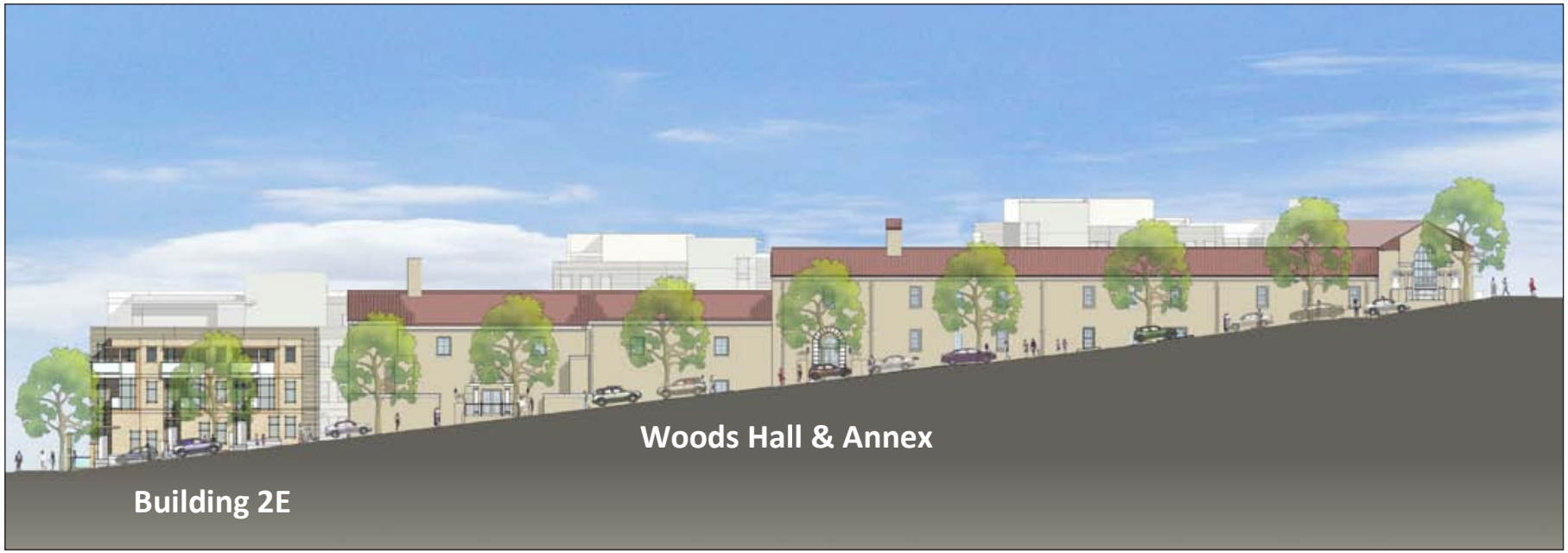
Laguna Street Elevation, Between Hermann and Waller Streets

55 Laguna . 211872

SOURCE: BAR Architects

Figure 4

Laguna Street Elevation, Between Waller and Haight Streets



SOURCE: BAR Architects

55 Laguna . 211872

Figure 5
Haight Street Elevation

SOURCE: BAR Architects

Figure 6
Waller Park Elevation, Looking South

SOURCE: BAR Architects

Figure 7
Waller Park Elevation, Looking North

SOURCE: BAR Architects

Figure 8

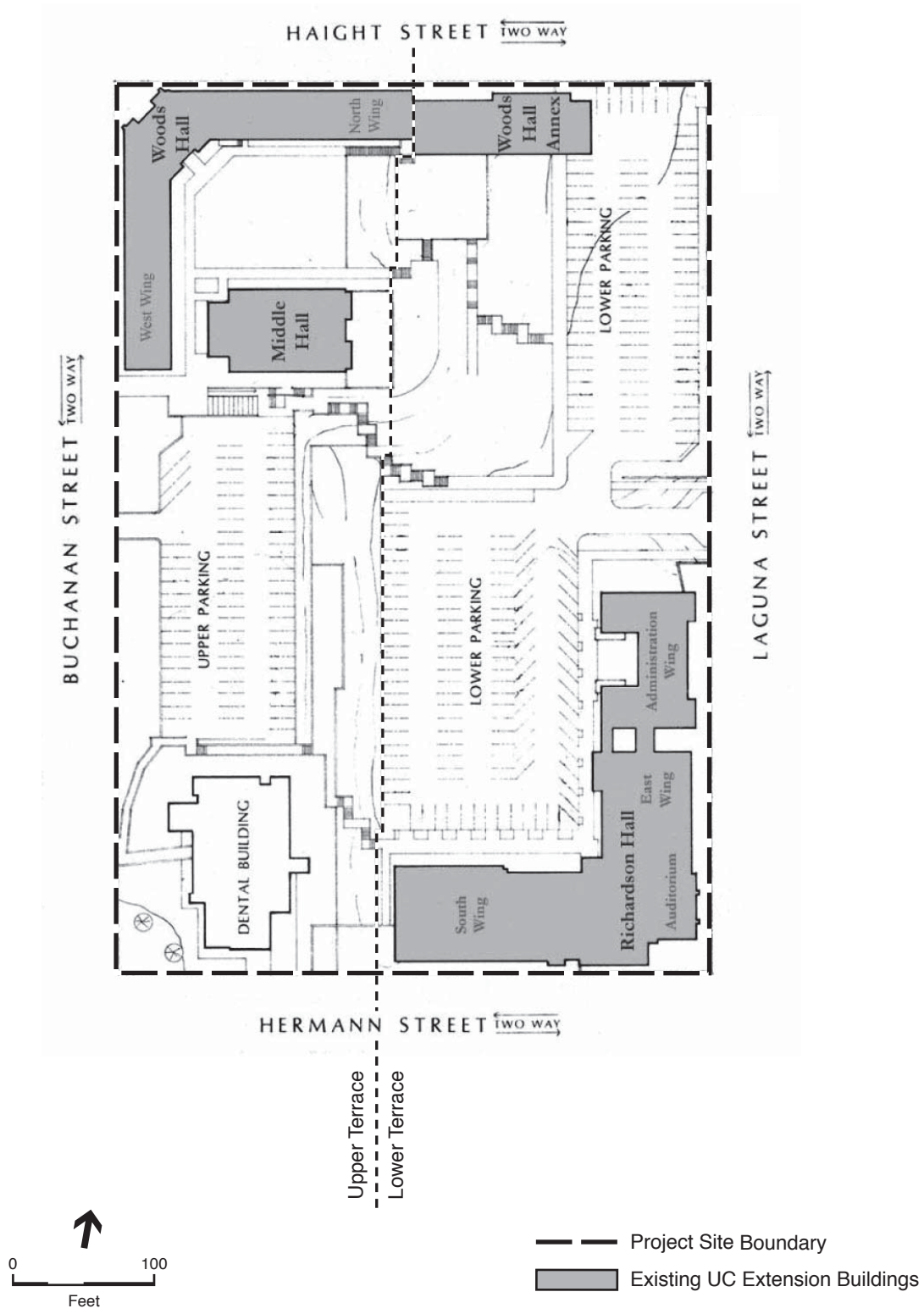
Buchanan Street Elevation, Between Haight and Waller Streets

SOURCE: BAR Architects

55 Laguna . 211872

Figure 9

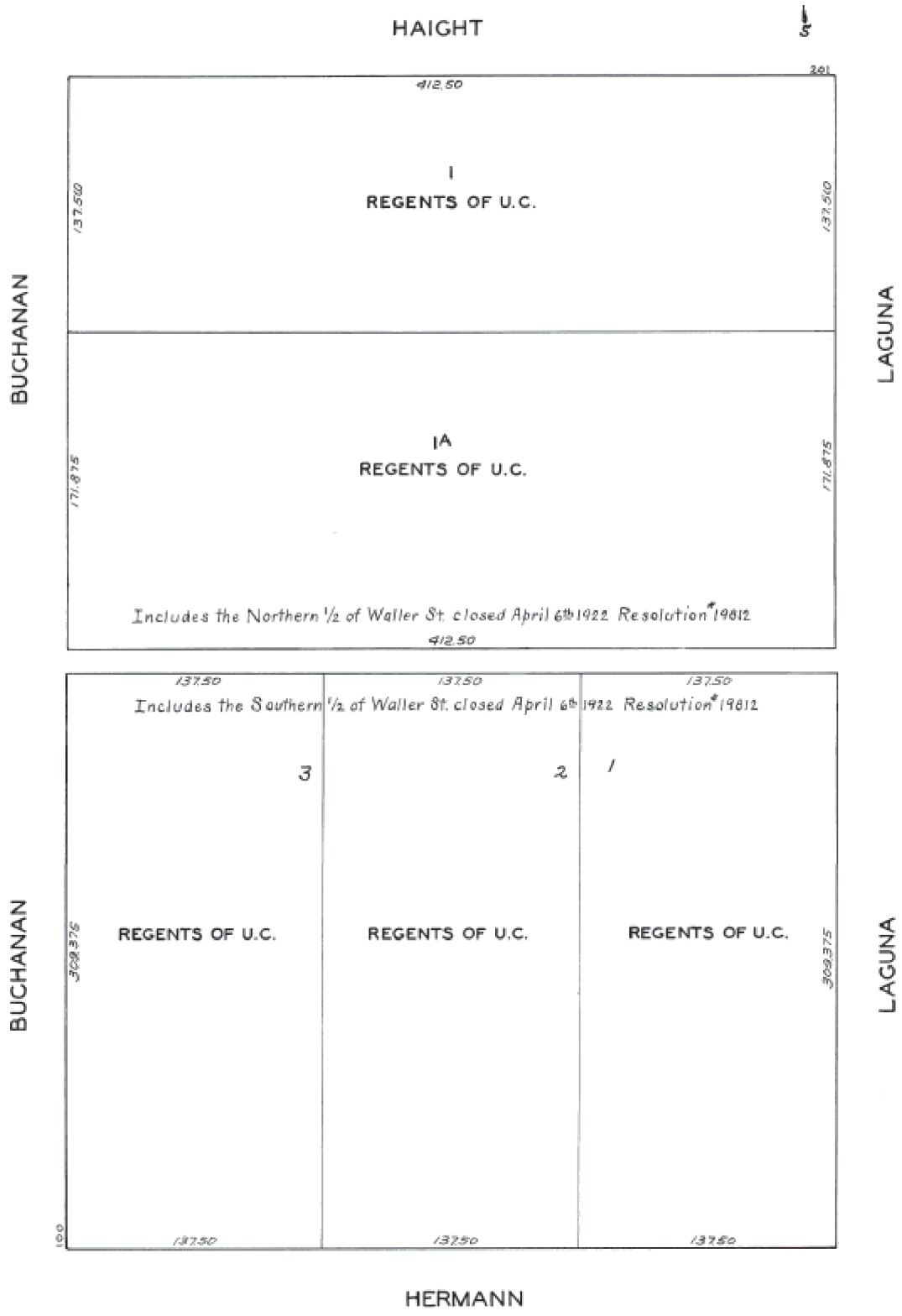
Buchanan Street Elevation, Between Waller and Hermann Streets



55 Laguna . 211872

SOURCE: Page & Turnbull, 2004

Figure 10
Existing Site Plan



55 Laguna . 211872

SOURCE: San Francisco Planning Department

Figure 11
Parcel Map

Middle Hall Interior

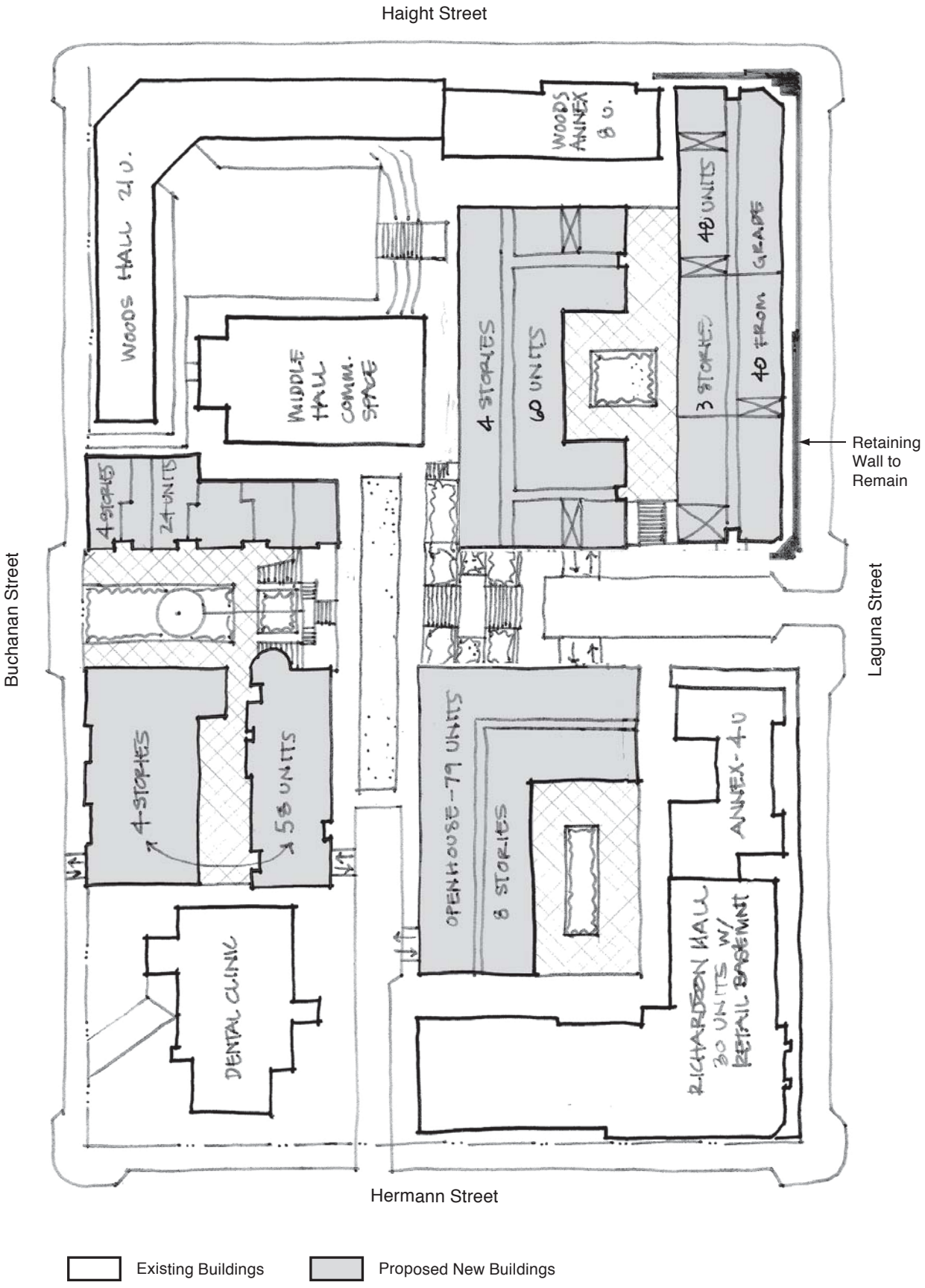
Richardson Hall Administration Wing Interior

Richardson Hall Administration Wing Interior

SOURCE: ESA

55 Laguna . 211872

Figure 12
Existing Interior Conditions



SOURCE: VMWP, 2006

55 Laguna . 211872

Figure 13
Preservation Alternative

CHAPTER 3.0
Statutory Checklist and HUD Environmental Standards

3.1 Statutory Checklist

Record the determinations made regarding each listed statute, executive order or regulation. Provide appropriate source documentation. [Note reviews or consultations completed as well as any applicable permits or approvals obtained or required. Note dates of contact or page references]. Provide compliance or consistency documentation. Attach additional material as appropriate. Note conditions, attenuation or mitigation measures required.

3.1.1 Historic Preservation[1]

[[National Historic Preservation Act, 16 U.S.C. 470(f), Section 106; 36 CFR 800; Programmatic Agreement (PA) by and Among the City and County of San Francisco, the California State Historic Preservation Officer, and the Advisory Council on Historic Preservation Regarding Historic Properties Affected by Use of Revenue from the Department of Housing and Urban Development Part 58 Programs, January 2007. Applies to all actions affecting properties on or eligible for National Register of Historic Places. Goal is to protect sites, building and objects with National, State or local historic or cultural significance. Identify effects of projects on properties. Compliance Steps invoked.]]

This section discusses the cultural resources for the Project Site and vicinity. For this discussion, "cultural resources" refers to both historic architectural resources and archaeological resources.

Historic architectural resources include buildings, structures, objects, sites, and historic districts. *Archeological resources* consist of prehistoric or historic-period archaeological resources. Prehistoric archeological materials might include obsidian and chert flaked-stone tools (e.g., projectile points, knives, scrapers) or toolmaking debris; culturally darkened soil ("midden") containing heat-affected rocks, artifacts, or shellfish remains; and stone milling equipment (e.g., mortars, pestles, handstones, or milling slabs). Historic-period materials might include stone, concrete, or adobe footings and walls; filled wells or privies; and deposits of metal, glass, and/or ceramic refuse.

1 All documents referenced in Section 3.1.1 are included in **Appendix A**.

The discussion of cultural resources is guided by an existing Programmatic Agreement (PA) between the City and County of San Francisco, California State Historic Preservation Officer (SHPO) and the Advisory Council on Historic Preservation (ACHP) pursuant to Section 106 of the National Historic Preservation Act (NHPA; 16 USC §470f) and its implementing regulations at 36 CFR Part 800.14.[2] The PA establishes the City's Section 106 responsibilities for the administration of undertakings subject to regulation by 24 CFR Part 58 which may have an effect on historic properties. The City is required to comply with the stipulations set forth in the PA for all undertakings that (1) are assisted in whole or in part by revenues from U.S. Department of Housing and Urban Development (HUD) Programs subject to 24 CFR Part 58 and that (2) can result in changes in the character or use of any historic properties that are located in an undertaking's Area of Potential Effect (APE). The Proposed Action is the approval of the release of federal funds subject to Part 58 and thus is subject to the Stipulations of the PA.

3.1.1.1 Proposed Action

The project site was originally the location of the Protestant Orphan Asylum, which operated on the site from 1854 to 1915, after which the San Francisco Normal School took over the orphanage facilities. All of the buildings that currently exist on the project site were constructed between 1924 and 1935 as the campus of the San Francisco State Teachers College (renamed San Francisco State College in 1935 and San Francisco State University in 1974). The Spanish Revival-style campus was designed by State Architect George B. McDougall. The former San Francisco State College campus became UC Berkeley's San Francisco Extension campus, which operated at the site from 1958 until 2002. In 2002, UC Berkeley closed its Extension campus and consolidated its Extension operations downtown. The campus has remained vacant since that time.

The project site—inclusive of Woods Hall, Woods Hall Annex, Richardson Hall, the Administration Wing of Richardson Hall, Middle Hall and the Laguna Street retaining wall—was listed as a Historic District on the National Register of Historic Places as San Francisco State Teachers' College on January 7, 2008.[3,4] Under National Register Criterion A (Events), the campus is representative of the broad patterns of events relating to the history of state normal schools [teachers' colleges] in California. Three of the existing buildings on the site—Richardson Hall (excluding the administration wing), Woods Hall and Woods Hall Annex—have also been designated San Francisco City Landmarks.[5]

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2 City and County of San Francisco, et. al., *Programmatic Agreement (PA) by and Among the City and County of San Francisco, the California State Historic Preservation Officer, and the Advisory Council on Historic Preservation Regarding Historic Properties Affected by Use of Revenue from the Department of Housing and Urban Development Part 58 Programs*, January 2007.[3] National Park Service, National Register of Historic Places Registration Form, San Francisco State Teacher's College, November 29, 2007.

3 National Park Service, National Register of Historic Places Registration Form, San Francisco State Teacher's College, November 29, 2007.

4 National Park Service, National Register of Historic Places, San Francisco State Teacher's College, available online: http://nrhp.focus.nps.gov/natreghome.do?searchtype=natreghome, accessed October 28, 2011.

5 San Francisco Board of Supervisors, Ordinance No. 216-07, Landmark Designation of Richardson Hall, Woods Hall, and Woods Hall Annex, Located at 55 Laguna Street, formerly known as the San Francisco State Teacher's College, amended in Board September 11, 2007.

Area of Potential Effects – Stipulation VI

Stipulation VI(C) of the 2007 PA (Area of Potential Effects) requires the City to determine and document the APE in accordance with 36 CFR §800.16(d) for all undertakings except for certain exempt activities specified in Stipulations VI.A and VI.B of the 2007 PA.

This undertaking includes the adaptive reuse of three buildings and the demolition of two other buildings that are part of a historic district listed in the National Register of Historic Places. Such activities are not exempted under Stipulation VI and the APE was set in accordance with Stipulation VI(C).

36 CFR §800.16(d) states that an APE means the geographic area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties, if any such properties exist. The APE is influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by the undertaking.

In accordance with this guidance and on the basis of the Historic Properties Survey Report (HPSR) written by VerPlanck Historic Preservation Consulting and approved by San Francisco Planning Department,[6] and on the basis of the response of the Northwest Information Center at Sonoma State University[7] to the request of December 13, 2011, by ESA for a records search (NWIC File No. 11-0755), MOH determined the APE for the proposed undertaking to encompass the two-block project site itself, inclusive of the UCSF Dental Clinic (primary APE), as well as 51 individual properties that immediately surround the project site (secondary APE). There are two properties located within the boundaries of the APE that are listed in the National Register. They are the project site itself, San Francisco State Teachers' College campus at 55 Laguna Street (listed 2008, as described above), and the United States Mint at 155 Hermann Street (listed 1988). In addition, the Hayes Valley Residential Historic District, a portion of which is located within the secondary APE (the 51 surrounding properties), was formally determined eligible for the National Register in 1997. Many of the properties that make up the secondary APE are contributors to the Hayes Valley Residential Historic District. (See the definition of APE in **Appendix A**, Historic Property Survey Report, which also includes the individual DPR forms.)

Identification of Historic Resources – Stipulation VII

Stipulation VII (Identification and Evaluation of Historic Properties). Paragraph D of Stipulation VII of the 2007 PA requires the City to evaluate all properties that may be affected by an Undertaking using National Register of Historic Places criteria set forth in 36 CFR Section 60.4. All such evaluations are to be documented by the City on a State of California Historic Resources Inventory Form. Stipulation VII.D.1 requires the City to submit determinations of eligibility to the SHPO. If the SHPO concurs in the determinations of eligibility, the properties are considered to be Historic Properties.

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6 VerPlanck Historic Preservation Consulting. *Historic Property Survey Report, 55 Laguna Street, Former UC Berkeley Laguna Extension Rehabilitation Project*, San Francisco, California, 2012.

7 Northwest Information Center (NWIC). Letter to San Francisco Mayor's Office of Housing RE: Record search results for the proposed 55 Laguna Street Mixed-Use Project—NEPA documentation, Sonoma State University, California Historical Resources Information System, NWIC File No.: 11-0755, February 10, 2012.

Historical Architectural Resources Identified within the APE. The San Francisco Planning Department evaluated the properties within the APE and determined that the following three properties were individually eligible for inclusion in the National Register:

- 100 Hermann Street, criteria A and C, under the 1906 Earthquake and Fire Reconstruction Context, Market and Octavia Neighborhood Area Plan.
- 1896-1898 Market Street (main building and garage), criterion C.
- 201 Waller Street, criterion C, under the Depression, World War II and Postwar Aftermath Context, Market and Octavia Neighborhood Area Plan.

The following properties were determined to be eligible for inclusion in the National Register as contributing properties to the previously identified Hayes Valley Historic District, parts of which lie within the secondary Area of Potential Effects for the undertaking.

Contributing properties within the APE include:

- 201 Waller Street
- 78 Buchanan Street
- 117 Buchanan Street
- 133 Buchanan Street
- 135 Buchanan Street
- 141 Buchanan Street
- 149 Buchanan Street
- 155 Buchanan Street
- 300 Buchanan Street
- 175 Haight Street
- 218 Haight Street
- 220 Haight Street
- 226 Haight Street
- 319 Haight Street
- 55 Herman Street
- 77 Herman Street
- 16 Laguna Street
- 50 Laguna Street
- 100 Laguna Street
- 126 Laguna Street
- 148 Laguna Street
- 11 Laussat Street
- 210 Waller Street
- 216 Waller Street
- 201 Buchanan Street
- 180 Haight Street
- 185 Haight Street
- 188 Haight Street
- 191 Haight Street
- 198 Haight Street
- 1900 Market Street
- 73 Waller Street
- 80 Waller Street

On April 3, 2012, MOH sought the SHPO concurrence with the determinations.[8] SHPO concurred with the determinations of eligibility for listing in the National Register of these properties on April 24, 2012.[9]

Treatment of Historic Properties – Stipulation VIII

Finding of Adverse Effect. Under the Proposed Action, the single-story administration wing of Richardson Hall would be demolished and replaced with the Openhouse Building of the Senior Development component of the proposed program. Middle Hall would be demolished and

8 San Francisco Mayor's Office of Housing (MOH), letter to State Historic Preservation Office RE: Consultation on State Teachers' College: 55 Laguna Street, San Francisco, CA, Identification and Evaluation of Historic Properties within the APE, April 3, 2012.

9 California State Historic Preservation Office (SHPO). Letter to San Francisco Mayor's Office of Housing RE: Housing Development, 55 Laguna Street, Determination of Eligibility (DOE), April 24, 2012.

replaced with Buildings 1B and 2D of the market-rate housing component of the proposed program. Portions of the existing retaining wall along Laguna Street between Waller and Haight Streets would also be demolished and replaced with the eastern portion of Building 2E of the market-rate housing component of the proposed program.

Richardson Hall would be adaptively reused for the Senior Development component of the proposed program. Woods Hall would be adaptively reused for market-rate housing, and Woods Hall Annex would be adaptively reused as a community center. Rehabilitation of Woods Hall, Woods Hall Annex, and most of Richardson Hall would be primarily restricted to the interior of these buildings, without substantial alterations to their exterior facades or rooflines, with the possible exception of new entrances from the interior courtyards and new openings for windows. The portion of Richardson Hall that is located along Laguna Street, containing the existing auditorium space, and a retaining wall along Laguna Street would be renovated to accommodate the proposed program, including the retail space.

Certificates of Appropriateness (COA) for these rehabilitation activities were approved by the San Francisco Historic Preservation Commission in accordance with Section 4.135 of the San Francisco City Charter on May 16, 2012.[10,11,12] Save the Laguna Street Campus, a consulting party to the Section 106 review of this Undertaking, appealed the approval of these COAs to the San Francisco Board of Supervisors on June 15, 2012.[13] On July 31, 2012, the San Francisco Board of Supervisors denied the appeal of Save the Laguna Street Campus and affirmed approval of the Certificate of Appropriateness.[14]

The Secretary of the Interior's Standards for Rehabilitation and Illustrated Guidelines for Rehabilitating Historic Buildings (the Rehabilitation Standards and the Guidelines, respectively) provide guidance for reviewing work to historic properties. Developed by the National Park Service for reviewing certified rehabilitation tax credit projects, the Standards have been adopted by local government bodies across the country for reviewing proposed work to historic properties under local preservation ordinances. The Rehabilitation Standards are also used for evaluating project effects under Section 106 of the National Historic Preservation Act (NHPA).

The Proposed Action would include demolition of one contributor (Middle Hall) to the National Register district and a portion of another (administration wing of Richardson Hall). As a National Register-listed property whose list of character-defining features includes its sparse arrangement of buildings around a central quadrangle type of arrangement, the proposed infill construction would compromise the integrity of the former campus. The proposed infill construction would also be much larger than the existing historic buildings and would bear little relationship to them.

10 San Francisco Historic Preservation Commission, Motion No 0157: 55 Laguna Street Certificate of Appropriateness, May 16, 2012.
11 San Francisco Planning Department, 55 Laguna Street Certificate of Appropriateness Case Report, May 16, 2012
12 San Francisco Planning Department, RE: Comments of the Historic Preservation Commission, Case No. 2012.0033ACEF, 55 Laguna Street Mixed Use Project, July 26, 2012.
13 Save the Laguna Street Campus, Letter to City and County of San Francisco Clerk of the Board RE: Appeal of the Historic Preservation Commission's May 16, 2012 Approval.
14 Board of Supervisors, City and County of San Francisco, Motion 120727, available online: http://www.sfbos.org/ftp/uploadedfiles/bdsupvrs/motions12/M12-0097.pdf, July 31, 2012.

Though the Proposed Action goes to some length to treat the remaining historic buildings with consideration, the Proposed Action would fail to comply with the Secretary of the Interior's Standards for Rehabilitation when considered in terms of its total physical and visual effects. The action would comply with Rehabilitation Standards 3–8, summarized as follows:

(3) Avoid creating a false sense of historical development or addition of conjectural features or elements from other historic properties;

(4) Retain changes to a property that have acquired historic significance in their own right;

(5) Preserve distinctive materials, features, finishes, and construction techniques or examples of craftsmanship that characterize a property;

(6) Repair rather than replace historic features;

(7) Undertake chemical or physical treatments, if necessary, using the gentlest means possible; and

(8) Protect and preserve archaeological resources in place; if resources must be disturbed, undertake mitigation measures.

The action would not comply with Rehabilitation Standards 1, 2 and 9–10, summarized as follows:

(1) Use of a property for its historic use or new use that requires minimal change;

(2) Retain and preserve the historic character of the property through avoidance of removal of distinctive materials or features, spaces, or relationships.

(9) Avoid destroying historic materials, facades, and spatial relationships that characterize the property, and new work should be compatible with the historic materials, features, size, scale and proportion, and massing of the old to protect the integrity of the property; and

(10) Undertake new additions and related construction in a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

Non-compliance with these standards would occur largely because of the permanent and irreversible effects to historic fabric and existing spatial and visual characteristics of the former campus. As such, the Proposed Action would have an adverse effect on National Register-listed properties in the primary APE. Upon completion of the project, the former San Francisco State Teachers' College campus at 55 Laguna Street would no longer remain eligible for listing in the National Register.[15]

[15] VerPlanck Historic Preservation Consultants, in its 2012 Historic Property Survey Report (included in **Appendix A**), determined that the proposed action would comply with Secretary of the Interior's Standards for Rehabilitation #1. To provide a conservative assessment of the proposed action's effects to historic resources, however, the San Francisco Mayor's Office of Housing (MOH) determined that the change of use would result in a change to distinctive materials, features, and spatial relationships of the 55 Laguna Street campus that would fail to comply with Standard #1. The MOH assessment concurs with that of the San Francisco Planning Commission in its August 2012 Conditional Use Authorization for the proposed action.

In accordance with Stipulation VIII.F.1.d, MOH advised SHPO on May 15, 2012, that the San Francisco Planning Department had determined that the Undertaking would have an adverse effect on a historic property.[16] On June 18, 2012, SHPO concurred with this finding and agreed that a Standard Mitigation Measures Agreement was not appropriate to resolve the adverse effects of this undertaking on historic properties and would look forward to crafting a Memorandum of Agreement once it had received the comments of the Historic Preservation Commission.[17]

Although the Proposed Action would introduce a significant new feature to the neighborhood, it would not result in an adverse effect to the National Register-eligible Hayes Valley Residential Historic District, or any other individual National Register-listed or eligible properties within the secondary APE. The construction of the new residential buildings at the center of the former UC Berkeley Laguna Extension campus would be generally compatible with most of the surrounding properties in terms of scale, proportion, and massing. Due to the significant change in grade between the northwest and southeast corners of the campus, the street façades of the proposed new buildings facing Buchanan and Haight streets (where the majority of the 2- to 3-story Victorian and Edwardian-era buildings in the historic district are located) would be approximately the same height as their historic neighbors on the opposite side of the street. Similarly, the taller sides of the proposed 4- to 7-story buildings facing Laguna and Hermann streets would face the tallest apartment buildings within the secondary APE; the height and massing of the new buildings would be comparable to these 1920s-era apartment buildings.

Archaeological Resources – Stipulation XI – (Consideration and Treatment of Archeological Resources)

The undertaking would involve grading, excavation and soil disturbance which could affect archeological resources.

As the undertaking is identified as one that has the potential to affect archeological resources per Stipulation XI.A.1 and does not qualify as an exception under Stipulation XI.B, ESA requested that the NWIC conduct a records search for the undertaking's APE on December 13, 2011, as is required by Stipulation XI.B.

A records search was conducted by reviewing pertinent Northwest Information Center (NWIC) base maps that reference cultural resources records and reports, historic-period maps, and literature for San Francisco County.[18] The NWIC search (File No. 11-0755) did not identify any recorded archaeological resources in or near the project site. The NWIC noted that there is a moderately high possibility of identifying Native American archaeological resources and a moderate to high possibility of identifying historic-period archaeological resources in the project vicinity. NWIC recommends halting construction in the event that cultural materials are discovered until the find

16 San Francisco Mayor's Office of Housing (MOH), letter to State Historic Preservation Office RE: Consultation on State Teachers' College: 55 Laguna Street, San Francisco, CA, May 15, 2012.

17 California State Historic Preservation Office (SHPO). Letter to San Francisco Mayor's Office of Housing RE: Housing Development, 55 Laguna Street, Determination of Eligibility (DOE), June 18 2012.

18 Northwest Information Center (NWIC). Letter to San Francisco Mayor's Office of Housing RE: Record search results for the proposed 55 Laguna Street Mixed-Use Project—NEPA documentation, Sonoma State University, California Historical Resources Information System, NWIC File No.: 11-0755, February 10, 2012.

can be evaluated by a qualified archaeologist, and that the Archaeological Research Design and Treatment Plan (ARDTP) prepared for a previous development proposal at this project site, be implemented.[19]

Invitation to ACHP

Upon obtaining the SHPO concurrence to the finding of adverse effect and in accordance with Stipulation VIII.F.1.E, MOH immediately notified the ACHP to initiate the consultation process set forth in 36 CFR Section 800.6. Included with this invitation to participate in consultation process were the documentation required under 36 CFR 800.11(e). See attached letters of April 24, 2012 and June 18, 2012.

On July 18, 2012, the ACHP declined to participate in the consultation process as Appendix A, Criteria for Council Involvement in Reviewing Individual Section 106 Cases of the regulations, did not apply to this project. The ACHP advised the Mayor's Office of Housing that the final Memorandum of Agreement (MOA) developed in consultation with the SHPO would have to be filed with the ACHP upon completion.[20]

Consultation Process

MOH initiated the consultation process required under the 36 CFR 800.6 and under the 2007 PA early in the environmental review process.

In accordance with 36 CFR 800.2(c), MOH sent letters of invitation to participate in the Section 106 review process to the California Historical Society, the Muwekma Ohlone Tribe, the National Trust for Historic Preservation and San Francisco Architectural Heritage. These invitations were not accepted.[21] In response to an email dated March 9, 2012, from Cynthia Servetnick, Save the Laguna Street Campus, was included as a consulting party.[22,23] Save the Laguna Street Campus was included in all correspondence required under the 2007 PA and the Section 106 process and given opportunity to comment on the determination of the APE, the identification of historic resources within the APE, and the terms of the proposed MOA.

On July 18, 2012, the City's Historic Preservation Commission (HPC) held a public hearing as part of the consultation process and reviewed the nature of the mitigation measures necessary to address the adverse effect of the undertaking.

The HPC Comments were as follows:

1. The Commission does not agree that the Sacred Palm tree should be moved as it may jeopardize the health of the tree.

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19 Archeo-Tec. *Archaeological Research Design and Treatment Plan for the Laguna Hill Project, San Francisco, California*, prepared for A.F. Evans Development, Inc. and Mercy Housing California, May 2005.
20 Advisory Council on Historic Preservation, Letter to San Francisco Mayor's Office of Housing, July 18, 2012.
21 VerPlanck Historic Preservation Consulting. *Historic Property Survey Report, 55 Laguna Street, Former UC Berkeley Laguna Extension Rehabilitation Project*, Appendix B, San Francisco, California, 2012.
22 VerPlanck Historic Preservation Consulting, Letter to Save the Laguna Street Campus, March 27, 2012.
23 Save the Laguna Street Campus, e-mail to Mayor's Office of Housing, March 9, 2012.

2. The Commission noted that the draft Historic Property Survey Report was written before the Project was modified by the Commission during the Certificate of Appropriateness hearing for the three local landmarks – Richardson Hall, Woods Hall, and Woods Hall Annex. The modified project reduced the level of impact to Richardson Hall by eliminating some proposed openings in that location. The approval also allowed for the addition of several new window openings at the Buchanan Street and Haight Street facades of Woods Hall

These comments were forwarded to the SHPO with the proposed MOA, which will be executed between the SHPO and the City, and concurred to by the concurring parties.

The 55 Laguna Street MOA will include stipulations to address the adverse effects of the project on cultural resources. The project sponsor would implement the stipulations identified in the 55 Laguna Street MOA, as stated under the **Mitigation Measure 1.2.1**, **Memorandum of Agreement**, in Chapter 1. With implementation of these stipulations, the adverse effects to cultural resources will have been resolved (see **Appendix A,** Memorandum of Agreement).

3.1.1.2 Preservation Alternative

The Preservation Alternative would avoid the adverse effects of the proposed undertaking by retaining and rehabilitating all buildings and structures identified as contributors to the National Register-listed site. By eliminating the internal street and reducing the overall scale and density of the development by approximately 25 percent, this alternative would also help to retain the feeling of an internally-focused campus. Given the reduction in the total size and intensity of use, and the retention of all identified historic resources, the effects of the Preservation Alternative would less than the effects of the proposed undertaking.

The proposed Preservation Alternative, as analyzed under the EIR for the 2008 project, would generally avoid the adverse effects to historic properties and comply with the Secretary of Interior's Standards for the Preservation of Historic Properties (Rehabilitation Standards) because it would retain Middle Hall and the Richardson Hall Administration Wing, as well as preserve the essential historic form of the campus as a unified site bounded by perimeter structures with additional buildings located in the interior of the site.[24] As the Preservation Alternative identified in the EIR and the one included here are identical, the same finding of no adverse effects resulting from the Preservation Alternative is made in this document as well.

[24] San Francisco Planning Department. *55 Laguna Mixed Use Project Draft Environmental Impact Report, Appendix A, Initial Study*, Planning Department Case No. 2004.0773E, State Clearing House No. 2005062084, January 27, 2007.

3.1.2 Floodplain Management

[[Flood Disaster Protection Act of 1973 (P.L. 93-291) and implementing regulations; National Flood Insurance Program (44 CFR Parts 59-79); 24 CFR 55, Executive Order 11988. Avoid direct or indirect support of floodplain development wherever there is a practicable alternative. Compliance not invoked.]]

3.1.2.1 Proposed Action

The Federal Emergency Management Agency (FEMA) prepares Flood Insurance Rate Maps (FIRMs) that identify areas subject to flood inundation, most often from a flood having a one percent chance of occurrence in a given year (also known as a "base flood" or "100-year flood"). FEMA refers to the portion of the floodplain or coastal area that is at risk from floods of this magnitude as a Special Flood Hazard Areas (SFHA). No finalized flood hazard zones have been mapped by the Federal Emergency Management Agency (FEMA) in San Francisco.[25] Draft maps indicate that the project site is not within or near a flood zone. The project is neither within a known FEMA floodplain nor within the preliminary Flood Insurance Rate Map prepared for the City and County of San Francisco on September 21, 2007. [26] The project would not involve either direct or indirect support of development in a floodplain.

The project site slopes steeply downward from northwest to southeast and is divided into two terraces. The majority of the existing buildings occupy the periphery of the site on the upper and lower terraces, with surface parking generally in the center of the site.

The streets around the project site slope downward from the northwest corner to the southeast corner. At its lowest point, the project site is more than 80 feet above sea level, the nearby neighborhoods immediately to the east and west and below that elevation. Due to these topographic characteristics, the project site is not susceptible to flooding.

In addition, the existing project site comprises primarily impervious surfaces. The Proposed Action would not substantially increase the amount of impervious surfaces, but instead could potentially improve drainage conditions on the site.

3.1.2.2 Preservation Alternative

The Preservation Alternative would occur in the same location as the Proposed Action, described above, which is not in or near a flood zone. The Alternative would not substantially increase the amount of impervious surfaces.

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25 United States Federal Emergency Management Agency (FEMA). Mapping Information Platform, web site: https://hazards.fema.gov/wps/portal/mapviewer, Flood Insurance Rate Map (FIRM), FIRM Mapping, U.S. Department of Homeland Security, accessed March 17, 2012.

26 San Francisco General Services Agency (GSA), *San Francisco Interim Floodplain Map*, Floodplain Management Program, available online at: http://sfgsa.org/Modules/ShowDocument.aspx?documentid=1761, July 2008.

3.1.3 Wetlands Protection

[[Executive Order 11990, Protection of Wetlands: Applies to any action proposed for construction in a wetland. Avoid direct or indirect support of new construction in wetlands wherever there is a practicable alternative. Compliance steps not invoked.]]

3.1.3.1 Proposed Action

The project site is not located within or near wetlands.[27,28] Therefore, the Proposed Action would not affect wetland or riparian areas.

3.1.3.2 Preservation Alternative

The Preservation Alternative would occur in the same location as the Proposed Action, described above, which is not in or near a wetland.

3.1.4 Coastal Zone Management Act

[[Sections 307(c), (d) Applies to any proposed activity affecting areas covered by an approved coastal zone management plan. Ensure that projects are consistent with coastal zone program. Compliance steps not invoked.]]

3.1.4.1 Proposed Action

The San Francisco Bay Conservation and Development Commission (BCDC) has permit authority over San Francisco Bay and lands located within 100 feet of the Bay shoreline. BCDC's *San Francisco Bay Plan* is the Coastal Zone Management Program for the San Francisco Bay Segment of the California Coastal Zone Management Program, pursuant to the Federal Coastal Zone Management Act (CZMA).[29] Under the CZMA, projects requiring federal approval or funding must, to the maximum extent practicable, be consistent with a state's coastal management program if the project would affect the coastal zone.

The project site is located more than 2 miles from the San Francisco Bay shoreline and more than 1 mile from the Mission Creek canal, the nearest surface body of water connecting to the bay; therefore, no formal finding of consistency with the *San Francisco Bay Plan* is required.

3.1.4.2 Preservation Alternative

The Preservation Alternative would occur in the same location as the Proposed Action, described above, which is not in or near a coastal zone.

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27 U.S. Fish and Wildlife Service Wetland Mapper, available online: http://www.fws.gov/wetlands/Data/Mapper.html, accessed July 26, 2012.

28 Environmental Science Associates (ESA). "Memorandum: 55 Laguna Project: Updated Biological Resources Assessment," March 28, 2012.

29 San Francisco Bay Conservation and Development Commission. San Francisco Bay Plan. Adopted in 1968. Reprinted in January 2007. http://www.bcdc.ca.gov/laws_plans/plans/sfbay_plan.shtml.

3.1.5 Sole Source Aquifers

[[40 CFR 149, Applies to federally assisted project which may contaminate an aquifer designated by EPA as the sole source of drinking water for a community. Prohibits financial assistance of projects which EPA determines may contaminate a designated sole source aquifer. Compliance steps not invoked.]]

3.1.5.1 Proposed Action

The project is not served by an EPA-designated sole-source aquifer watershed and would not affect a sole-source aquifer subject to the HUD-EPA Memorandum of Understanding.[30,31,32]

3.1.5.2 Preservation Alternative

The Preservation Alternative would occur in the same location as the Proposed Action, described above, which is not served by a sole-source aquifer and would not affect a sole-source aquifer.

3.1.6 Endangered Species Act

[[50 CFR 402: Applies to any action which might jeopardize continued assistance of endangered or threatened species or result in destruction or modification of critical habitat. Federal agencies shall insure that their actions conserve listed species and ensure, in consultation with FMS.NMFS, that their actions not jeopardize listed species or modify critical habitat. Compliance steps not invoked.]]

3.1.6.1 Proposed Action

No federally listed species or proposed for listing or federally designated critical habitats are documented within the proposed project area. The site does not provide potential habitat for any federally listed species. No impacts on federally listed species or critical habitat are anticipated as a result of the project. The project site is in a developed urban area and does not support or provide habitat for rare or endangered wildlife species.[33,34,35,36]

3.1.6.2 Preservation Alternative

The Preservation Alternative would occur in the same location as the Proposed Action, described above, and would not affect endangered species.

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30 United States Environmental Protection Agency, Groundwater website: http://epa.gov/region09/water/groundwater/ssa.html, Pacific Southwest, Region 9, accessed March 2012.

31 United States Environmental Protection Agency. Sole Source Aquifers subject to HUD-EPA Memorandum of Understanding, dated April 30, 1990.

32 United States Environmental Protection Agency, Sole Source Aquifers in Region 9, Internet Web Site: http://www.epa.gov/region9/water/groundwater/ssa-pdfs/ssafact.pdf, accessed July 23, 2012.

33 Environmental Science Associates (ESA). "Memorandum: 55 Laguna Project: Updated Biological Resources Assessment," March 28, 2012.

34 San Francisco Planning Department. *55 Laguna Mixed Use Project Draft Environmental Impact Report, Appendix A, Initial Study*, Planning Department Case No. 2004.0773E, State Clearing House No. 2005062084, January 27, 2007.

35 California Department of Fish and Game, web site: http://www.dfg.ca.gov/, accessed July 23, 2012.

36 United States Fish and Wildlife Service, web site: http://criticalhabitat.fws.gov/crithab/, accessed July 23, 2012.

3.1.7 Wild and Scenic Rivers Act

[[Sections 7 (b), (c); applies to rivers designated under the Act and proposed activity affecting rivers on the Nationwide Inventory of potential wild, scenic and recreational rivers. Assure that Federal actions do not foreclose designation under the Wild and Scenic Rivers Act. Compliance steps not invoked.]]

3.1.7.1 Proposed Action

The National Wild and Scenic Rivers System protects rivers designated for their wild, scenic, or recreational values.[37]

The City and County of San Francisco contain no wild or scenic rivers.

3.1.7.2 Preservation Alternative

The Preservation Alternative would occur in the same location as the Proposed Action, described above. There are no wild or scenic rivers in San Francisco.

3.1.8 Air Quality

[[Clean Air Act, Sections 176 (c) and (d), and 40 CFR 6, 51, 93; Applies to all federal actions. Federal actions must conform to the State Implementation Plan.]]

3.1.8.1 Proposed Action

For consistency with local air quality management, the Bay Area Air Quality Management District BAAQMD standards were used to evaluate impacts for several pollutants. For air quality, the analysis considers whether the Proposed Action or alternatives would:

1) Conflict with the Clean Air Act General Conformity Rule;

2) Emit a criteria pollutant or precursor that exceeds local thresholds for construction or operation;

3) Exceed local standards for fugitive dust emissions during construction;

4) Exceed carbon monoxide standards during operation;

5) Expose sensitive receptors to health risks in excess of local thresholds;

6) Exceed local $PM_{2.5}$ standards for new residential development; or

7) Expose a substantial number of people to odor emissions.

[37] United States Forest Service. *National Wild and Scenic Rivers System: September 2009* (Map), United States Department of Agriculture, available online: http://www.rivers.gov/rivers/california.php, accessed July 23, 2012.

The federal Clean Air Act requires each state to identify areas that have ambient air quality in violation of federal standards. States are required to develop, adopt, and implement a state implementation plan (SIP) to achieve, maintain, and enforce federal ambient air quality standards in these nonattainment areas. SIP elements are developed on a pollutant-by-pollutant basis whenever one or more air quality standards are being violated. In California, local and regional air pollution control agencies have primary responsibility for developing SIPs, generally in coordination with local and regional land use and transportation planning agencies. The Bay Area Air Quality Management District (BAAQMD) is the responsible regional air pollution control agency in the San Francisco Bay Area.

An area's compliance with national ambient air quality standards under the Clean Air Act is categorized as nonattainment, attainment (better than national standards), unclassifiable, or attainment/cannot be classified. The unclassified designation includes attainment areas that comply with federal standards, as well as areas for which monitoring data are lacking. Unclassified areas are treated as attainment areas for most regulatory purposes. Simple attainment designations generally are used only for areas that transition from nonattainment status to attainment status. Areas that have been reclassified from nonattainment to attainment of federal air quality standards are automatically considered maintenance areas, although this designation is seldom noted in status listings. The San Francisco Bay Area is designated as nonattainment for the federal 8-hour ozone standard and the 24-hour fine particulate matter ($PM_{2.5}$) standard. The San Francisco Bay Area is designated as attainment or unclassified for the other national ambient air quality standards.

With respect to the state ambient air quality standards, California classifies areas as attainment, nonattainment, nonattainment-transitional, or unclassified. The San Francisco Bay Area is designated as nonattainment for the state ozone, inhalable particulate matter (PM_{10}) and $PM_{2.5}$ standards and as attainment or unclassified for the other state ambient air quality standards.

The predominant regulation that guides assessment of air quality impacts of federal actions is the General Conformity Rule, established under the Clean Air Act (Section 176(c)(4)). The General Conformity Rule ensures that the actions taken by federal agencies in nonattainment and maintenance areas do not interfere with a state's plans to meet national standards for air quality. The project area is located within the San Francisco Bay Area Air Basin, which is designated as a nonattainment area for the federal 8-hour ozone standard and the federal fine particulate matter ($PM_{2.5}$) standard. The air basin is designated as a maintenance area with respect to the federal carbon monoxide (CO) standards.

In keeping with the General Conformity Rule process, this assessment applies the appropriate *de minimis* thresholds of the Rule as they apply to the San Francisco Bay Area Air Basin for ozone precursors, $PM_{2.5}$, and CO. The *de minimis* thresholds for these three pollutants in the San Francisco Bay Area Air Basin are 100 tons per year for each pollutant.

Project emissions were calculated using the CalEEMod land use air quality estimator model and are presented in **Table 3-1**. The data in Table 3-1 shows that total annual emissions of the Proposed Action would result in emissions that would be less than 5 percent of the *de minimis*

TABLE 3-1
MAXIMUM ANNUAL OPERATIONAL EMISSIONS FOR THE PROPOSED ACTION

	Maximum Annual Emissions (tons/year)			
	VOC	**NOx**	**CO**	**PM2.5**
2013				
Area Emissions	2.80	0.04	3.41	0.02
Energy Emissions	0.03	0.22	0.09	0.02
Vehicle Emissions	1.32	2.61	12.15	0.15
2013 Total	**4.15**	***2.87***	**15.65**	**0.19**
De Minimis Threshold for San Francisco Bay Area	100	100	100	100
Above Threshold?	**No**	**No**	**No**	**No**

NOTE: VOC= volatile organic compounds; NOx= oxides of nitrogen; CO =carbon dioxide; PM2.5= particulate matter with a diameter less than 2.5 microns.

threshold for volatile organic constituents (VOS, an ozone precursor), less than 3 percent of the *de minimis* thresholds for oxides of nitrogen (NOx, also an ozone precursor), less than 16 percent of the *de minimis* thresholds for carbon dioxide, and less than 1 percent of the *de minimis* thresholds for fine particulate matter (PM2.5).

All project operational emissions of non-attainment pollutants and carbon monoxide would be less than their respective *de minimis* threshold and consequently would conform to the California State Implementation Plan implemented pursuant to the federal Clean Air Act.

Construction Air Quality

Removal of asbestos-containing materials, lead-based paint materials, and any other hazardous materials during construction activities would comply with the National Emissions Standards for Hazardous Air Pollutants and the BAAQMD Regulation 11, Rule 1 and Rule 2. These building materials and removal protocols are further discussed below in **Section 3.2.2**.

For construction activities, as stated in **Section 4.1.9**, the San Francisco Dust Control Ordinance (Ordinance 176-08) would reduce the quantity of dust generated by site preparation, demolition, and construction work in order to protect the health of the general public and on-site workers, minimize public nuisance complaints and avoid orders to stop work by the Department of Building Inspection.

San Francisco Dust Control Ordinance

San Francisco Health Code Article 22B and San Francisco Building Code Section 106.A.3.2.6, (collectively, the San Francisco Construction Dust Control Ordinance) require that all site preparation work, demolition, or other construction in San Francisco that could create dust or expose or disturb more than 10 cubic yards or 500 square feet of soil, comply with specified dust control measures.

The project sponsor and contractors responsible for construction activities are required by the Ordinance (San Francisco Building Code Section 106.3.2.6.3) to implement the following or equivalent measures acceptable to the Director of Public Health:

- designation of a person responsible for monitoring compliance with dust control requirements;
- watering construction areas to prevent dust from becoming airborne;
- providing as much water as necessary to control dust (without creating run-off) for dust-generating activities;
- wet sweeping or vacuuming streets, sidewalks, paths and intersections where work is in progress at the end of each workday, covering inactive stockpiles of designated size; and
- using dust enclosures, curtains and collectors, as necessary, to control dust in excavation areas.

For project sites greater than half an acre and within 1,000 feet of sensitive receptors, the Ordinance requires that the project sponsor submit a site-specific dust control plan for approval by the San Francisco Health Department, prior to issuance of a building permit by the Department of Building Inspection (DBI). The Proposed Action and alternatives would be required to comply with the Ordinance and to submit a site-specific dust control plan. The Ordinance (Article 22B) requires that the site-specific dust control plan contain all provisions of the San Francisco Building Code Section 106.3.2.6.3 (summarized in the previous paragraph), in addition to site-specific measures to accomplish the goal of minimizing visible dust. The following is a summary of the site specific measures listed in Article 22B, which may be included in the site-specific dust control plan:

- Submit a map to the director of the San Francisco Department of Public Health (DPH), showing all sensitive receptors within 1,000 feet of the site;
- Wet down areas of soil at least three times per day;
- Provide an analysis of wind direction and install upwind and downwind particulate dust monitors;
- Record particulate monitoring results;
- Hire an independent third party to conduct inspections and keep a record of those inspections;
- Establish shutdown conditions based on wind, soil migration, and other factors;
- Establish a hotline for surrounding community members who may be affected by project related dust;
- Limit the area subject to construction at any one time;
- Install dust curtains and windbreaks on the property lines, as necessary;
- Limit the amount of soil in hauling trucks to the size of the truck bed and secure the load with a tarpaulin;
- Enforce a 15 mile per hour (mph) speed limit for vehicles entering and exiting construction areas;

- Sweep affected streets with water sweepers at the end of the day;
- Install and use wheel washers to clean truck tires;
- Stop construction when winds exceed 25 mph;
- Apply soil stabilizers to inactive areas; and
- Sweep adjacent streets to reduce particulate emissions

Pursuant to HUD Guidance, air quality effects are further analyzed in **Section 4.1.9, Air Quality—Effects of Ambient Air Quality on Project and Contribution to Community Pollution Levels.**

3.1.8.2 Preservation Alternative

As described in **Chapter 2**, this alternative would construct new in-fill residential uses similar to the Proposed Action, but at a reduced size and density. Although the alternative would result in slightly more retail space than the Proposed Action, the substantial reduction in total units (332 under the Alternative versus 440 under the Proposed Action) would result in overall lower annual emissions of VOC, NOx, CO, and PM 2.5 than the Proposed Action.

Regarding construction, this alternative would result in less demolition than the Proposed Action. Five new buildings would be built, and the historic buildings on the site would be renovated and adaptively reused. The alternative would comply with National Emissions Standards for Hazardous Air Pollutants and the BAAQMD Regulation 11, Rule 1 and Rule 2.

3.1.9 Farmland Protection Policy Act

[[7 CFR 658; applies to any federally assisted action which encourages the conversion of prime, unique, State/locally important farmlands. Compliance requires that extent to which Federal programs contribute to the unnecessary conversion of farmland to nonagricultural uses be minimized. Compliance steps not invoked.]]

3.1.9.1 Proposed Action

The project site is located in an urban area, and the site itself is almost completely covered with buildings, paving, and other impervious surfaces. The project site is designated as "urban land" by the United States Department of Agriculture Natural Resources Conservation Services. Therefore, the Proposed Action would not affect farmlands.[38]

3.1.9.2 Preservation Alternative

The Preservation Alternative would occur in the same location as the Proposed Action, described above. The alternative would not affect farmlands.

[38] United States National Resources Conservation Service. Web Soil Survey, website: http://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx, United States Department of Agriculture, accessed March 2012.

3.1.10 Environmental Justice

[[Executive Order 12898; states that federal agencies shall identify and address disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority and low-income populations]]

3.1.10.1 Proposed Action

U.S. Department of Housing and Urban Development (HUD) regulations found at 24 CFR Parts 50 and 58, mandate compliance with Executive Order 12898 (EO 12898), *Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations*, for HUD and/or HUD applicants. HUD defines low-income through a comparison of annual household income for households of various sizes with the area median income. HUD defines income guidelines for extremely low income households (those with 30 percent or less of the area median income), very low-income households (those with 50 percent or less of the area median income) and low-income households (those with 80 percent or less of the area median income).

Low-income population is defined as any readily identifiable group of low-income persons who live in geographic proximity and, if circumstances warrant, geographically dispersed/transient persons (such as migrant workers or Native Americans) who will be similarly affected by the proposed program, policy, or activity.

Minority population is defined as any readily identifiable group of minority persons who live in geographic proximity and, if circumstances warrant, geographically dispersed/transient persons (such as migrant workers or Native Americans) who will be similarly affected by a proposed program, policy or activity.

A *minority population* is considered to be present if the minority population percentage of the affected area is greater than the minority population percentage in the general population or other appropriate unit of geographic analysis (census tracts are generally considered appropriate).

Guidance from the Council on Environmental Quality (CEQ) states that "Minority populations should be identified where either (a) the minority population of the affected area exceeds 50 percent or (b) the minority population percentage of the affected area is meaningfully greater than the minority population percentage in the general population or other appropriate unit of geographic analysis".[39]

The project site is vacant and therefore not currently occupied by environmental justice populations.

[39] CEQ; *Environmental Justice, Guidance Under the National Environmental Policy Act*, December 10, 1997.

The project site is in Census Tract 168.01 in the County of San Francisco. It is surrounded by Tracts 163, 164, 167, 168.02, 169, and 202.[40,41]

In 2010, 8.4 percent of Census Tract 168.01 respondents identified themselves as Black or African American, 9.8 percent of respondents identified themselves as Asian, and 5.5 percent of respondents identified themselves as Two or More Races. The racial composition of surrounding census tracts was similar to these proportions, with the exception of Census Tract 202, which had a higher proportion of residents who identify themselves as Asian (16 percent).[42]

Federal poverty thresholds are updated each year by the Census Bureau. Poverty thresholds are updated each year using the change in the average annual Consumer Price Index for All Consumers. The poverty threshold for a family of four was $22,113 in 2010, and $22,811 in 2011.[43]

The poverty rate in San Francisco County was estimated to be 12.8 percent in 2010, compared to 15.8 percent in California as a whole. Census Tract 168, containing the project site, had a poverty rate of 12.9 percent in 2009, about the same as the county as a whole and lower than the state as a whole.[44]

The Proposed Action would include renovation and replacement of existing vacant buildings with new market-rate and affordable-housing units. It would include a community center and public open spaces and provide offices for Openhouse, which is an organization that provides housing and services for lesbian, gay, bisexual, and transgender senior citizens. Therefore, the Proposed Action would improve the quality of life of the low-income and minority populations and would have beneficial long-term economical impacts on these populations.

The Proposed Action would have minor adverse effects on the residents in nearby Census Tracts. These effects would be primarily associated with traffic, noise, and air quality associated with project construction and operation, as discussed in this EA. Given the mixed racial profile of the neighborhood, the Proposed Action would not disproportionately affect minority residents living there. Minority or low-income groups would not disproportionately bear adverse human health and environmental consequences from the Proposed Action.[45]

40 Note: Census Tract 168 was applicable in the 2005–2009 American Community Survey (Census Tract poverty rate statistics). Tract 168 was divided into Tracts 168.01 and 168.02 for the 2010 Census (Census Tract population by race statistics).

41 United States Census Bureau, "2010 Census – Census Tract Reference Map: San Francisco County, CA," prepared by Geography Division, December 8, 2010.

42 United States Census Bureau. "Race and Hispanic or Latino Origin: 2010," U.S. Census Summary File 2010.

43 United States Census Bureau. "Poverty Thresholds for 2011 by Size of Family and Number of Related Children Under 18 Years," available online: http://www.census.gov/hhes/www/poverty/data/threshld/index.html, accessed March 23, 2012.

44 United States Census Bureau. "Poverty Status in the Past 12 Months," American Community Survey, 2005–2009, available online: http://factfinder2.census.gov/faces/nav/jsf/pages/searchresults.xhtml?refresh=t.

45 United States Environmental Protection Agency, EJ View, website mapper: http://epamap14.epa.gov/ejmap/entry.html, accessed July 23, 2012.

3.1.10.2 Preservation Alternative

The Preservation Alternative would occur in the same location as the Proposed Action, described above. The alternative would include renovation of existing vacant buildings and construction of new market-rate and affordable-housing units. Although it would result in fewer total units than the Proposed Action, the alternative would include a community center and public open spaces. The alternative action would improve the quality of life of the low-income and minority populations and would have beneficial long-term economical impacts on these populations.

3.2 HUD Environmental Standards

3.2.1 Noise Abatement and Control

[[24 CFR 51 B; applies to HUD requirements related to noise; contains standards for exterior noise levels along with policies for approving HUD-supported or -assisted housing projects in high-noise areas. The requirements establish three zones: an acceptable zone where all projects could be approved, a normally unacceptable zone where mitigation measures would be required and where each project would have to be individually evaluated for approval or denial, and an unacceptable zone in which projects would not as a rule be approved. HUD's regulations also require that recipients of Community Development Block Grant or HOME funds take into consideration the noise criteria and standards in the environmental review process and consider ameliorative actions when noise sensitive land developments are proposed in noise exposed areas.[46] Compliance invoked.]]

3.2.1.1 Proposed Action

The main source of noise at the project site and throughout San Francisco is traffic noise.

HUD Noise Standards

The following noise standards for new housing construction would be applicable to this project.

- 65 day-night noise level (DNL)[47] or less – acceptable – No further action required
- Exceeding 65 DNL but not exceeding 70 DNL – normally unacceptable – minimum 25 dB Sound Transmission Class window-wall noise attenuation or other mitigation action required.
- Exceeding 70 DNL but not exceeding 75 DNL – normally unacceptable – minimum 30 dB Sound Transmission Class window-wall noise attenuation or other mitigation action required.

46 U.S Department of Housing and Urban Development, *The Noise Guidebook*, Office of Community Planning and Development, available online: http://portal.hud.gov/hudportal/HUD?src=/program_offices/comm_planning/environment/training/guidebooks/noise, accessed August 17, 2012.

47 DNL, the day-night noise level, is the 24-hour average sound level, in decibels (dB), including a 10-dB penalty for noise between 10:00 p.m. and 7:00 a.m., reflecting the generally increased annoyance of nighttime noise. Another descriptor, the community noise equivalent level (CNEL), is similar but adds an additional 5 dB penalty between 7:00 p.m. and 10:00 p.m.

- Exceeding 75 DNL – unacceptable – action allowed with adequate noise attenuation, or other mitigation, but only if an environmental impact statement (EIS) is prepared, or a waiver of the EIS requirement is issued.

The Department of Housing and Urban Development (HUD) requires consideration of all noise sources that may adversely affect noise-sensitive areas, such as housing. These noise sources include airports within 15 miles, railroads within 3,000 feet, and major roadways within 1,000 feet of the project site.[48,49]

HUD approvals in Normally Unacceptable Noise Zones require a minimum of 5 decibels additional sound attenuation for buildings having noise-sensitive uses if the day-night average sound level is greater than 65 decibels but does not exceed 70 decibels, or a minimum of 10 decibels of additional sound attenuation if the day-night average sound level is greater than 70 decibels but does not exceed 75 decibels.

Noise attenuation measures in Unacceptable Noise Zones require the approval of the Assistant Secretary for Community Planning and Development, or the Certifying Officer.

Airports

There are two major airports within 15 miles of the project site. The San Francisco International Airport is located approximately 10 miles to the south; and Oakland International Airport is located approximately 10 miles to the east. As shown in **Appendix B**, the extent of the 65 CNEL noise contours of the San Francisco International Airport and Oakland International Airport are more than 8 miles from the project site.[50,51,52,53,54]

Railroads

There are no railroads within 3,000 feet of the project site. The closest rail line to the project site is the Caltrain line, which provides service between San Francisco and San Jose. At their nearest point, the Caltrain tracks are about 7,100 feet from the project site, and there are no adverse noise effects on the site related to their use.

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48 United States Department of Housing and Urban Development (HUD). *The Noise Guidebook*, http://portal.hud.gov/hudportal/HUD?src=/program_offices/comm_planning/environment/training/guidebooks/noise, updated August 20, 2004.

49 United States Department of Housing and Urban Development. 24 CFR Part 51 – Environmental Criteria and Standards, Subpart B – Noise Abatement and Control, available online: http://www.hudnoise.com/hudstandard.html, accessed March 23, 2012.

50 Alameda County Airport Land Use Commission (ALUC). *Draft Oakland International Airport: Airport Land Use Compatibility Plan*, prepared by Environmental Science Associates (ESA), http://www.acgov.org/cda/planning/landuseprojects/documents/Draft_OAK_ALUCP_091510.pdf, September 2010.

51 City / County Association of Governments of San Mateo County. *Comprehensive Airport Land Use Compatibility Plan for the Environs of San Francisco International Airport: Draft Final*, http://www.ccag.ca.gov/pdf/plans-reports/2012/SFOCLUP_consolidated_Feb2012.pdf, prepared by Ricondo & Associates, et. al., February 2012.

52 Port of Oakland. *Oakland International Airport Master Plan*, Community Noise Equivalent Levels (CNEL) Contours 2004 and 2010, http://www.oaklandairport.com/masterplan_oak/pdf/2010_CNEL_v_2004.pdf, March 2006.

53 San Francisco International Airport (SFIA). Aircraft Noise Abatement Office, SFO Interactive Community Noise Map Application, available online at http://www.flyquietsfo.com/mapping_tools.asp, 2012.

54 San Mateo County. *Comprehensive Airport Land Use Plan*, December 1996.

Although there is not railroad service in the project site vicinity (see below for discussion of nearby historic streetcars), the San Francisco Municipal Transportation Agency (SFMTA) Metro light rail system operates beneath Market Street, about 100 feet southeast of the project site. These cars operate on subterranean tracks in the project site vicinity. Therefore, they have minimal effect on noise levels at the project site.

Roadways

The project is located in the Lower Hayes Valley / Upper Market neighborhoods. The dominant noise source is traffic along Market Street, as well as traffic on other streets in the project site vicinity. In addition, the SFMTA F line, a line comprising historic streetcar service between the Castro neighborhood and Fisherman's Wharf, runs along tracks in the center lanes of Market Street.

Noise Measurement. In order to determine the suitability of a site under U.S. Department of Housing and Urban Development (HUD) criteria, sound levels can be measured using sound meters, or sound levels can be calculated using HUD's Noise Assessment Guidelines. [55] The noise level of the project site was empirically determined through noise monitoring using a calibrated Metrosonics dB-308 logging noise meter. Long-term noise monitoring was conducted at the southeast corner of the project site at the façade of Richardson Hall. This location was selected because it is the location on the project site that is directly exposed to the major noise sources in the area, including vehicular traffic on Market Street, Laguna Street and Hermann Street and operations of the F-line historic streetcar service along Market Street. Hourly average noise levels over a 24-hour period—starting at noon on June 5, 2012—were used to determine the DNL for the maximally exposed portion of the project site that would accommodate residential space.[56] The noise environment of the southeastern corner of the project site was monitored to be 66 DNL. (See **Appendix B** for the detailed measurements.) This monitored worst-case noise level of the project site exceeds the noise level considered normally unacceptable relative to HUD standards by 1 dBA. Based on the HUD Noise Assessment Guidelines, special building construction would be necessary to ensure that people indoors are sufficiently protected from outdoor noise. Please see section below regarding State of California Title 24 requirements that would ensure that indoor residential areas of multi-family residences are sufficiently mitigated with building design and materials to maintain a 45 DNL interior noise level, which would be consistent with the interior noise level goal of HUD.

Regarding nearby freeways, the project site is 540 feet west of Octavia Boulevard, which connects directly to the San Francisco Central Freeway and Route 101. Generally, a single row of buildings between the receptor and noise source reduces the noise level by 5 dB. Given the distance and rows of intervening buildings, there would be no adverse effects related to noise from Octavia Boulevard or U.S. 101. Furthermore, any contribution to noise levels on the project site from vehicle traffic on

[55] U.S Department of Housing and Urban Development, *The Noise Guidebook*, Office of Community Planning and Development, available online: http://portal.hud.gov/hudportal/HUD?src=/program_offices/comm_planning/environment/training/guidebooks/noise, accessed August 17, 2012.

[56] Exact weather on the measurement date was not recorded. Summer months in San Francisco are predominantly cool and dry, with occasional fog from the marine layer off the coast.

Octavia Boulevard or U.S. 101 would have been captured in the noise monitoring data collected at the eastern project site boundary and therefore considered in the above analysis.

According to HUD Noise Regulations (CFR 51.106(4)(e)), "in addition to assessing existing noise exposure, future conditions should be projected. To the extent possible, noise exposure shall be projected to be representative of conditions that are expected to exist at a time at least 10 years beyond the date of the project or action under review."

To provide a conservative projection, the noise assessment assumes a 1 percent annual growth in traffic volumes, plus project increment trip distribution, on streets surrounding the project site. Under this scenario, traffic volumes on adjacent streets would increase a maximum of 31 percent by 2026.

Generally, a doubling of sound energy (in this case traffic) would result in 3 dBA increase in noise levels, and that a 50 percent increase in traffic would result in a 2 dBA increase. Therefore a conservative estimate of the future noise level in 2026 would be a 2 dBA increase over the existing monitored value of 66 dBA, or 68 dBA. Additional detail is provided in **Appendix B**.

State of California – California Building Code

As described in **Mitigation Measure 1.2.4**, **Noise Reduction**, Title 24 of the California Code of Regulations establishes uniform noise insulation standards for residential projects. Residences must be designed to limit intruding noise to an interior CNEL (or DNL) of at least 45 dB. The San Francisco Department of Building Inspection (DBI) would review the final building plans to ensure that the building wall and floor/ceiling assemblies meet state standards regarding sound transmission. This requirement would ensure that interior noise levels of the project residential units would comply with interior noise goal of HUD and the State of California.

This requirement would ensure that interior noise levels of the project residential units would comply with interior noise goal of HUD and the State of California.

City of San Francisco – Environmental Protection Element of the General Plan

The City of San Francisco's General Plan Environmental Protection Element has acoustical standards that are consistent with the State Standards.

Adherence to the Title 24 standards would ensure that noise effects on the project occupants would not be adverse.

3.2.1.2 Preservation Alternative

The Preservation Alternative would not affect the existing noise levels around the project site. Roadways, airports, and other noise-generation sources would operate under similar conditions as under the Proposed Action, described above. The alternative would result in exposure to similar noise levels.

Based on the HUD Noise Assessment Guidelines, special building constructions will be necessary to ensure that people indoors are sufficiently protected from outdoor noise. State of California Title 24 requirements, described above, would ensure that indoor residential areas of multi-family residences are sufficiently mitigated with building design and materials to maintain a 45 DNL interior noise level, which would be consistent with the interior noise level goal of HUD.

3.2.2 Toxics / Hazardous / Radioactive Materials, Contamination, Chemicals or Gases

[[24 CFR 58.5 (i)(2); applies to all actions. Minimize the impact of environmental hazards on HUD-assisted activities – chemical and radioactive material, activities of flammable or explosive nature, aircraft hazards. This section addresses the existing setting relevant to hazards and hazardous materials associated with historic and current uses of the project site and vicinity. This section incorporates the results of environmental database records searches conducted for the project area. Information in this section is also based on review of Environmental Data Resources (EDR) report for the project site prepared in January 2012.]]

3.2.2.1 Proposed Action

Hazardous Building Components

The site has historically been occupied by institutional uses, such as schools, orphanages, and colleges. The last building to be constructed on the site was the UCSF Dental Clinic in the 1970s.

In September 2004, a government records search was conducted as part of the Phase I and Limited Phase II site assessments, prepared by Treadwell & Rollo, to identify potential sources of hazardous substances that may affect the soil and/or groundwater quality at the project site.[57] The project site was found to be referenced in three hazardous materials databases. Small quantities of photo chemicals and photo processing waste were previously generated in a former darkroom and were recycled. No records were found in the San Francisco Department of Public Health (DPH) and San Francisco Fire Department (SFFD) files regarding fuel or hazardous material uses or releases at the project site.

Public files were also reviewed in the previous Phase I for sites in proximity to the project site that were in an up-gradient or cross-gradient direction of groundwater flow to the project site to evaluate the potential for these sites to affect the conditions at the project site. The 2004 findings determined that the potential for these cases to affect the environmental conditions at the project was minimal because groundwater was not affected and/or due to the distance or slope of the release source in relation to the project site.

The Limited Phase II Environmental Site Assessment analyzed soil samples collected from eight shallow borings drilled throughout the project site. Analytical results indicated low levels of motor oil and diesel in samples, and most metal concentrations were within normal background

[57] Treadwell & Rollo, Inc. *Phase I and Limited Phase II Environmental Site Assessment, 55 Laguna Street, San Francisco, California,* September 10, 2004.

ranges found in the western United States, except for one boring in which an elevated total lead concentration of 350 mg/kg was detected. Serpentinite encountered in some borings contained natural asbestos fibers, which may be a health risk when airborne (of the asbestos concentration in the samples, however, only one sample out of 10 of serpentinite tested as part of the Phase II investigations contained asbestos, and only with a concentration of less than 1 percent by weight).

Given that the project site has not been occupied since preparation of the Phase I and Phase II reports, in January 2012, a database search was conducted for the project site to identify any potential changes in site conditions or potential hazards associated with contaminated soil or groundwater that may have been documented in the area around the project site since that time. The database report showed the project site listed on only two of the three hazardous materials databases previously reported: HAZNET (a hazardous waste manifest database) and RCRA SQG (a database of small quantity hazardous waste generators). These findings do not indicate any new information that would substantially affect previous analysis of potential hazards.[58]

The review of surrounding sites also did not indicate any potential upgradient sources that would represent a likely contributor to onsite contamination. Therefore, the most recent database search did not identify any substantial changes to what was previously reported in the 2004 assessments.

Based on no known new uses of the project site since the 2004 environmental Phase I and Phase II site assessments combined with the findings of the most recent 2012 database search, there is no indication of any new sources of contamination or changed conditions compared to what was previously discovered.

The project sponsor would follow the recommendations of the 2004 Phase I and Limited Phase II environmental site assessment prepared for the project site, which has been reviewed by the San Francisco Department of Public Health (DPH) for accuracy. Because of elevated concentrations of lead and asbestos detected at the project site, a soil management plan (SMP) and a Health and Safety Plan (HSP) would be required prior to construction for use during site excavation to reduce worker and public exposure to these compounds. The SMP would include a soil-handling plan that segregates Class I from Class II or III fill material and isolates fill material from the underlying native soil. The HSP would outline proper handling procedures and health and safety requirements to minimize worker and public exposure to hazardous materials during construction. During construction, on-site observation of soil stockpiling and sample collection would be performed for a more focused disposal characterization of the soil schedule for off-site disposal. These requirements have been incorporated into **Mitigation Measure 1.2.3, Soil Management Plan and Health and Safety Plan**.

[58] Environmental Database Resources (EDR). *EDR Radius Map Report with Geocheck, 55 Laguna Street San Francisco, CA 94102,* Inquiry Number: 3241326.1s, January 17, 2012.

SMPs and HSPs are monitored and regulated by DPH. The project sponsors will develop these plans, which will be reviewed and approved by DPH prior to construction, as required by the City.[59,60]

Hazardous Building Components

Asbestos

All of the buildings that currently exist on the project site were constructed between 1924 and 1935 as the campus of the San Francisco State Teachers College. Considering the age of the structure on the project site, asbestos-containing materials may be present.

Asbestos is regulated both as a hazardous air pollutant and as a potential worker safety hazard. BAAQMD and California Division of Occupational Safety and Health Administration regulations restrict asbestos emissions from demolition and renovation activities and specify safe work practices to minimize the potential to release asbestos fibers. These regulations prohibit emissions of asbestos from asbestos-related manufacturing, demolition, or construction activities, require medical examinations and monitoring of employees engaged in activities that could disturb asbestos, specify precautions and safe work practices that must be followed to minimize the potential to release asbestos fibers, and require notice to federal and local government agencies before renovation or demolition that could disturb asbestos. California requires licensing of contractors who conduct asbestos abatement.

Pursuant to **Mitigation Measure 1.2.5, Asbestos & Lead-Based Paint Abatement,** the project sponsor would conduct an asbestos survey and would comply with Section 19827.5 of the California Health and Safety Code, adopted January 1, 1991, which requires that local agencies not issue demolition or alteration permits until an applicant has demonstrated compliance with notification requirements under applicable federal regulations regarding hazardous air pollutants, including asbestos. The Bay Area Air Quality Management District (BAAQMD), vested by the California Legislature with authority to regulate airborne pollutants, including asbestos, through both inspection and law enforcement is to be notified ten days before any proposed demolition or abatement. BAAQMD notification includes listing the names and addresses of operations and persons responsible; providing the description and location of the structure to be demolished or altered, including size, age, and prior use and the approximate amount of friable asbestos; giving the scheduled starting and completion dates of demolition or abatement; stating the nature of planned work and methods to be used; listing procedures to be used to meet BAAQMD requirements; and giving the name and location of the waste disposal site to be used.

The local office of the California Department of Occupational Safety and Health must be notified of asbestos abatement. Asbestos abatement contractors must follow state regulations contained in

59 San Francisco Planning Department. *55 Laguna Mixed Use Project Draft Environmental Impact Report, Appendix A, Initial Study*, Planning Department Case No. 2004.0773E, State Clearing House No. 2005062084, January 27, 2007.

60 Mercy Housing California, personal communication to Mayor's Office of Housing RE: 55 Laguna DPH VRAP Letter, July 24, 2012.

8CCR1529 and 8CCR341.6 through 341.14, where there is asbestos-related work involving 100 square feet or more of asbestos-containing material.

Asbestos removal contractors must be certified by the Contractors Licensing Board of the State of California. The owner of the property where abatement is to occur must have a Hazardous Waste Generator Number assigned by and registered with the Office of the California Department of Health Services in Sacramento. The contractor and hauler of the material are required to file a Hazardous Waste Manifest, which details the hauling of the material from the site and the disposal of it. Pursuant to California law, the San Francisco Department of Building Inspection (DBI) would not issue the demolition permit until the project sponsor has complied with the notice requirements described above.

These regulations and procedures, already established as a part of the permit review process and reiterated in **Mitigation Measure 1.2.5, Asbestos & Lead-Based Paint Abatement**, would ensure that any potential effects due to asbestos removal would not be adverse.

Lead-Based Paint

Given the age of the building, lead-based paint (LBP) may be present. California Division of Occupational Safety and Health Administration standards establish a maximum safe exposure level for construction where lead exposure may occur, including demolition where materials containing lead are present, removal or encapsulation of materials containing lead, and new construction, alteration, repair, and renovation of structures with materials containing lead. Inspection, testing, and removal of lead-containing building materials are to be performed by state-certified contractors required to comply with applicable health and safety and hazardous materials regulations. HUD has published guidelines for evaluating and controlling LBP hazards in housing. Typically, building materials with LBP attached are not considered hazardous waste unless the paint is chemically or physically removed from the building debris. San Francisco Building Code Section 3425, Work Practices for Lead-Based Paint on Pre-1979 Buildings and Steel Structures, would apply to project construction activities. Pursuant to **Mitigation Measure 1.2.5, Asbestos & Lead-Based Paint Abatement**, the project sponsor shall conduct a lead-based paint survey and follow applicable safety regulations during renovation or demolition.

Electrical Equipment Containing Polychlorinated Biphenyls and Mercury

Given the age of the buildings, polychlorinated biphenyls (PCBs) and mercury may be present in electrical equipment, such as fluorescent light ballasts. The California Department of Toxic Substances Control has classified PCBs as a hazardous waste when concentrations exceed 5 parts per million (ppm) in liquids or when a standard extract of a nonliquid exceeds 5 ppm. Electrical transformers and fluorescent light ballasts may contain PCBs, and if so, they are regulated as hazardous waste and would be transported and disposed of as hazardous waste. Most ballasts manufactured since 1978 do not contain PCBs and are required to have a label stating that PCBs are not present.

Spent fluorescent light tubes, thermostats, and other electrical equipment contain heavy metals that, if disposed of in landfills, can leach into the soil or groundwater. Lighting tubes sometimes

contain concentrations of mercury that exceed regulatory thresholds for hazardous waste and, therefore, must be managed in accordance with hazardous waste regulations. Elemental mercury is present in many electrical switches, including thermostats, and when disposed of, such mercury is considered hazardous waste.

Disposal of PCBs and mercury-containing waste in a regular landfill could result in a significant environmental impact. Before buildings are demolished, light fixtures and electrical components that contain PCBs or mercury would be identified, removed, and disposed of in accordance with the California Department of Toxic Substances Controls "universal waste" procedures.

Regarding Airport Safety Zones, as explained in Section 3.2.4, the project site is not within the boundary of the San Francisco International Airport Land Use Policy Plan, including the airport safety or clear zones. In addition, no portion of the Project Site is within a Federal Aviation Administration (FAA) Part 77 defined Runway Object Free Area or Runway Safety Area. San Francisco International Airport, the closest airport to the site, is approximately 10 miles to the south.

3.2.2.2 Preservation Alternative

The Preservation Alternative would occur at the same site as the Proposed Action. As under the Proposed Action, under the Preservation Alternative the project sponsors will prepare an SMP and HSP, which would be reviewed and approved by DPH prior to any construction activities. The alternative could also require abatement of hazardous building materials in accordance with the protocols described above.

3.2.3 Siting of HUD-Assisted Projects near Hazardous Operations

[[24 CFR 51 C; HUD will not approve an application for assistance for a proposed project located at less than the acceptable separation distance from a hazard unless appropriate mitigation measures are implemented or are already in place.]]

3.2.3.1 Proposed Action

HUD regulations require that federally assisted projects be located at an Acceptable Separation Distance (ASD) from hazardous operations.[61] The regulation applies to proposed HUD-assisted projects located in proximity to stationary above-ground storage tanks (ASTs) in excess of 100 gallons. The ASD is determined by using the online HUD ASD Assessment Tool or the ASD Chart in HUD's ASD Guidebook.[62, 63] ASD calculations presume level topography with no

61 24 C.F.R. 51 C; 24 C.F.R. 58

62 United States Department of Housing and Urban Development. Acceptable Separation Distance Electronic Assessment Tool, available online: http://www.hud.gov/offices/cpd/environment/asdcalculator.cfm, accessed July 11, 2012.

63 United States Department of Housing and Urban Development. *Acceptable Separation Distance Guidebook*, available online: http://portal.hud.gov/hudportal/documents/huddoc?id=HUD-Guidebook.pdf, accessed July 11, 2012. ASD Chart list AST volumes and the required ASD can be found on pages C-25-28.

intervening objects between the hazard and the project site. HUD regulations at 24 C.F.R. 51.205 provide that the nature of the topography or an existing permanent structure of sufficient size and strength to shield the proposed project from the hazard may serve to alter or eliminate the ASD requirement.

Here, due to the number of intervening buildings and topography, the Proposed Action would not expose people or buildings to explosive or flammable operations within a one mile radius. The online calculator supports this determination. ASTs between 923 feet and 1 mile of the project site range from 1,605 to 120,000 gallons, as shown in **Table 3-2**.[64] The online Assessment Tool calculates the minimum acceptable distance for the tank 120,000 gallon tank is approximately

TABLE 3-2
ACCEPTABLE SEPARATION DISTANCE FOR ABOVE-GROUND STORAGE TANKS

ASTs within 1 Mile	Distance from Site (feet)	Size (gallons)	ASD from Site (feet, assume undiked)
198 Valencia Street	923	1,605	336
1525 Howard Street	2,428.8	2,735	
1455 Market Street	2,534.4	120,000	2,032.30
100 Van Ness Street	2,587.2	3,000	
1480 Folsom Street	3,273.6	1,700	
1275 Market Street	3,696	1,200	
100 Larkin Street	4,065.6	2,000	
201 Alabama Street	4,171.2	1,400	
901 Van Ness Street	< 5,280	1,000	
999 Van Ness Street	5,280	1,000	
1001 Van Ness Street	5,280	3,580	

2,032 feet. The only tank closer to the project site is 923 feet away, with a size of 1,605 gallons and an ASD of 336 feet. All other ASTs within one mile are farther away, and smaller, than the 120,000-gallon tank. Therefore, all ASTs within one mile of the project site are located outside the ASD.

3.2.3.2 Preservation Alternative

The Preservation Alternative would be undertaken at the same location as the Proposed Action. All ASTs within one mile of this site are located outside the ASD.

64 Environmental Database Resources (EDR). *EDR Radius Map Report with Geocheck, 55 Laguna Street San Francisco, CA 94102,* Inquiry Number: 3241326.1s, January 17, 2012.

3.2.4 Airport Clear & Accident Potential Zones

[[24 CFR 51 D; It is HUD general policy to apply standards to prevent incompatible development around civil airports and military airfields]]

3.2.4.1 Proposed Action

San Francisco International Airport (SFO) is about 10 miles south of the project site. The project site is well outside the boundaries of the San Francisco Airport runway protection zones as depicted on the "existing conditions" and "future airport layout" drawings contained in SFO's Airport Layout Plan (ALP). The project site is outside all other defined safety zones, airspace protection zones, and Airport Influence Areas of the airport's Comprehensive Land Use Plan (CLUP) and CLUP update.

Oakland International Airport (OAK) is about 10 miles east of the project site. The project site is well outside the boundaries of Oakland Airport runway protection zones and all other defined safety zones.

There are no military airfields in San Francisco County or the nearby vicinity; therefore, no military airfield APZ or Clear Zone would affect the Proposed Action.

Airport clear zone maps are presented in **Appendix B**.

3.2.4.2 Preservation Alternative

The Preservation Alternative would occur at the same location as the Proposed Action. No military airfield APZ or Clear Zone would be affected by the Preservation Alternative.

CHAPTER 4.0
Environmental Assessment Checklist

[[Environmental Review Guide HUD CPD 782, 24 CFR 58.40; Ref. 40 CFR 1508.8 &1508.27]]

This chapter evaluates the significance of the effects of the proposal on the character, features and resources of the project area. Under each heading, relevant base data and verifiable source documentation to support the finding is presented. In each heading, the appropriate impact code from the following list is presented as a determination of impact. **Impact Codes**: **(1)** - No impact anticipated; **(2)** - Potentially beneficial; **(3)** - Potentially adverse; **(4)** - Requires mitigation; **(5)** - Requires project modification.

4.1 Land Development

4.1.1 Conformance with Comprehensive Plans and Zoning

This section provides a summary of the plans, policies, and land use regulations of the City and County of San Francisco and regional agencies that have policy and regulatory control over the project and examines the conformity of the proposal with those plans.

General Plan: The San Francisco General Plan (General Plan), adopted by the Planning Commission and the Board of Supervisors, is both a strategic and long-term document, broad in scope and specific in nature. The General Plan is the embodiment of the City's collective vision for the future of San Francisco, and comprises a series of elements, each of which deal with a particular topic, that applies Citywide. The General Plan contains the following elements: Air Quality, Arts, Commerce and Industry, Community Facilities, Community Safety, Environmental Protection, Housing, Recreation and Open Space, Transportation, and Urban Design.[1]

The San Francisco General Plan does not include a separate Land Use Element; instead, land use policies are dispersed throughout the other elements of the General Plan, as well as in its various area plans. The area plans identify specific localized goals and objectives for a neighborhood or district which cover their respective geographic areas of the City. The General Plan includes 15 area plans that serve to guide the nature of future development within specific districts of the City. Adoption of area plans has been accompanied by parallel revisions or additions to the Planning Code that serve as detailed implementation controls for such plans. The area plan that applies to the proposed project and alternatives is the Market-Octavia Area Plan.

[1] San Francisco Planning Department, San Francisco General Plan, http://www.sf-planning.org/ftp/general_plan/index.htm, accessed August 11, 2012.

4.1.1.1 Proposed Action (4—Requires Mitigation)

Regional Plans and Policies

The five principal regional planning agencies and their policy plans that guide planning in the nine county Bay Area are (1) the Association for Bay Area Governments' *A Land Use Policy Framework and Projections 2009*, (2) the Bay Area Air Quality Management District's (BAAQMD) *Clean Air Plan* and *Bay Area 2005 Ozone Strategy*, (3) the Metropolitan Transportation Commission's *Regional Transportation Plan (RTP) - Transportation 2030*, (4) the San Francisco Regional Water Quality Control Board's (RWQCB) *San Francisco Basin Plan*, and (5) the San Francisco Bay Conservation and Development Commission's (BCDC) *San Francisco Bay Plan*. Due to the size, location, and nature of the proposed project and alternatives, there would be no anticipated conflicts with regional plans.[2]

San Francisco Policy Guide

In 2004, the San Francisco Planning Department published a policy guide that included recommendations for redevelopment of the project site.[3] The guide includes the following principles applicable to the Proposed Action:

- *To the greatest extent possible, retain and reuse structures and historic resources of merit unless their alteration or demolition is clearly and demonstrably outweighed by other public goals and objectives*. The Proposed Action retains several historic buildings, although it includes the demolition of Middle Hall, the administration wing of Richardson Hall, and portions of the Laguna Street retaining wall. Demolition of these structures would facilitate construction of 440 housing units under the Proposed Action. This EA also includes analysis of a Preservation Alternative, which would retain these structures and result in construction of 332 housing units through renovation and new construction.

- *Reinstate Waller Street into the network of city streets by making it publicly accessible (though not necessarily to automobile traffic), reestablishing distinct northern and southern blocks.* The Proposed Action adheres to this principle.

- *Carefully relate the height and scale of new buildings to existing character and scale of buildings on the surrounding blocks. Generally, this will mean grouping taller new structures or additions to the existing historic resources toward Market Street along Hermann and Laguna Streets, with an overall reduction in height and scale toward smaller scale residential development to the north*. Under the Proposed Action, the tallest building—the seven-story Openhouse building—would be located closest to Market Street. Buildings heights would decrease moving westward, and facades facing Buchannan Street would be four stories tall.

2 San Francisco Planning Commission Draft Motion, hearing Date: August 16, 2012, Case No.:2012.0033ACFEU.
3 San Francisco Planning Department, *A Policy Guide for Considering Reuse of the University of California Berkeley Extension Laguna Street Campus*, Better Neighborhoods Program, December 2004.

San Francisco General Plan

The San Francisco Planning Commission also determined that the proposed project is consist with the Objectives and Policies of the General Plan. The full analysis of the determination of compliance with the General Plan is contained in **Appendix D**, San Francisco Planning Commission Draft Motion, hearing Date: August 16, 2012, Case No. 2012.0033ACFEU. A summary of the findings with regard to specific General Plan Elements follows.

Housing Element

Consistent with Housing Element Policies 1.1 and 1.10, the project would provide a range of rental housing types and sizes, affordable family housing, and affordable senior housing in an area where households can easily rely on public transportation on Haight and Market Streets, walking and bicycling for many of their daily trips. Policies 4.2 through 4.5 state that the city shall provide housing for a range of populations, including permanently affordable housing, and encourage integrated neighborhoods. The project would include housing for LGBT and other seniors and includes universal design principles in the senior units. The project would also provide rental apartments with a permanent affordable housing component integrated into an established mixed-income neighborhood.

The project would not conflict with Housing Element Policies 5.1 and 5.5, which call for a mix of unit types and equal access to subsidized housing units. Residents of all income levels would have access to the 280 family dwelling units developed by Alta Laguna, LLC, and an additional 50 units developed by Alta Laguna would be affordable. All lower-income seniors would have equal access to the affordable senior units developed by 55 Laguna, L.P. The project would provide a range of unit types that would enable residents to move throughout the development as their needs change.

Consistent with Housing Element Policies 11.1, 11.3, 11.5–11.7, the project would respect the neighborhood character through building height and design, and would not substantially and adversely affect the character of the existing Hayes Valley neighborhood. The project would foster community interaction by including publicly accessible open space, multiple entrances and townhouse units along Laguna, Haight and Buchanan Streets.

The development is sited in an area that currently provides adequate access to infrastructure. As part of the development, new public open space, street improvements, a community center, senior services and a community garden would be constructed. As set forth in the Market and Octavia Area Plan (in which the development is located), the project site is well served by infrastructure and other quality of life elements, including open space and neighborhood services. In addition, the project incorporates significant new open space, community facilities, neighborhood retail and senior services. Therefore, it would not conflict with Policies 12.2 or 12.3.

Consistent with policies 13.1 and 13.2, the project would incorporate sustainable development elements to qualify for LEED-ND certification, is located in close proximity to jobs in downtown San Francisco, and has easy access to public transportation, pedestrian and bicycle routes.

Transportation Element

Consistent with Transportation Element policies 1.2, 1.3, and 11.3, the project's location and design would ensure that it would be accessible to pedestrians and transit riders. For example, pedestrians would be able to walk the length of the former Waller Park, and the project would add a mews to bisect the site from north to south. Regarding alternative modes, the project would comply with the Area Plan's discouragement of on-site parking through a parking ratio of approximately 0.60 space per unit and approximately 159 space- efficient parking stackers, 10 car share parking spaces, and 126 Class I bicycle storage spaces. And due to the frequency and number of MUNI routes near the site, the site should have the high rate of ridership similar to the rest of the neighborhood.

Consistent with policies 34.1 and 34.3, which encourage reduction in off-street parking, parking in the new development would be limited to 0.60 spaces per unit, which is less than the 0.75 spaces per unit permitted by the SUD.

Commerce and Industry Element

The project would be consistent with Commerce and Industry Policy 1.1, which states that the city shall encourage development which provides substantial net benefits and minimizes undesirable consequences. This project would provide substantial net benefits in the form of adaptively reusing a vacant and underutilized site in the Hayes Valley neighborhood with minimal adverse effects.

Urban Design Element

Regarding the Urban Design Element, the project would protect and reinforce the existing street pattern and topography, consistent with Policy 1.2. The new buildings would be designed to complement the architectural character of the existing buildings that will remain and the surrounding neighborhood. Adherent to Policy 1.3, the new buildings would generally reflect the character of buildings that front the surrounding streets. All the buildings feature elements that create an active pedestrian environment (e.g., stoops and porches at ground floor residential units) and elements that minimize the massing of the buildings by use of breaking up facades at upper building levels.

Policies 3.1, 3.2, and 3.5 state that new buildings should promote harmony in visual relationships, avoid extreme contrast, and relate to character of existing buildings. The new buildings are designed to be compatible in massing, materials and color with the three landmark structures to be preserved, as well as the predominant urban design of the surrounding neighborhood. The tallest project buildings, the seven-story buildings on either side of Waller Park at Laguna Street, would be generally similar in height to existing residential buildings that surround the site, such as the seven-story (80 foot) apartment buildings at 1900 Market Street, 78 and 300 Buchanan Street, 50 Waller Street, and 16 and 50 Laguna Street.

Recreation and Open Space Element (ROSE)

The project would be consistent with Policies 4.5 and 4.6 of the ROSE, which require private usable open space and public open space related to the size of the potential population. As

determined by the Planning Department, the project would provide open space to serve project residents at least equal to the requirements of the Planning Code. In addition, it would provide approximately 41,000 square feet of publicly accessible open space.

Air Quality Element

The project mix of uses and proximity to existing commercial services and amenities would be located near numerous MUNI lines and therefore qualify as compact development where an extensive transportation infrastructure exists, thereby reducing automobile emissions consistent with Policies 3.1, 3.2, 3.4, and 3.6.

Market-Octavia Plan

The Market-Octavia Area Plan is an area plan of the General Plan. The plan area is bounded generally by Turk, Franklin, Hayes, Market, Tenth, Howard, 13th, Duboce, Scott, Waller, Webster, Oak, Buchanan, Grove, and Laguna Streets. According to the Planning Department, the Project is, on balance, consistent with Objectives and Policies of the Market Octavia Area Plan, including Objective 6.2, which states the University of California at Berkeley Extension site is an important opportunity site, where new housing and ground floor commercial activities could strengthen the area.[4] Policy 6.2.3 states that any future reuse of the campus should balance the need to reintegrate the site with the neighborhood and to provide housing, especially affordable housing, with the provision for public uses such as education, community facilities, and open space.[5] The policy further states that any new development on the site should be carefully organized around a comprehensive master plan that responds to the unique challenges of such a large site surrounded by a relatively fine-grained urban fabric within a cluster of historic buildings.[6]

The proposed redevelopment of the site is a comprehensive endeavor that includes almost the entirety of the block and retains three local landmarks. The redevelopment provides both market-rate and affordable housing, as well as open space, community facility space, and offices for Openhouse—which advocates on behalf of LGBT seniors. The project would not affect the only existing educational use on the site.

San Francisco Planning Code

As stated in the Description of the Proposal, in April 2008 the San Francisco Board of Supervisors Board of Supervisors adopted Ordinance 68-08, adding Planning Code Section 249.32, the Laguna, Haight, Buchanan and Hermann Streets Special Use District (SUD).[7] The purpose of the ordinance was to facilitate a mixed-use development at the former University of California Extension site

4 San Francisco Planning Department, Market Octavia Plan, available online, http://www.sf-planning.org/index.aspx?page=1713, page 74.
5 *Ibid*, page 76
6 *Ibid*.
7 San Francisco Planning Department, Special Use District Map, http://www.amlegal.com/nxt/gateway.dll/California/zoningmaps/dat/su07.pdf?f=templates$fn=document-frame.htm$3.0', accessed July 23, 2012.

located within the SUD. At the time of the entitlement hearings in 2008, the proposal included: (1) approximately 330 dwelling units; (2) approximately 110 additional units of senior affordable housing; (3) approximately 12,000 square feet of community facility space; and (4) approximately 5,000 occupied square feet of neighborhood-serving retail space in a total of 10 buildings on the property. That project also included approximately 90,690 square feet of parking in two underground garages for a total of approximately 310 spaces and approximately 42,000 square feet of publicly accessible open space.[8]

At that time, the Board of Supervisors also adopted Ordinances 66-08 and 67-08, which amended the General Plan and modified the Zoning (Use and Height & Bulk Districts) on the project site.[9,10] Prior to adoption of these ordinances, the site was designated and zoned for public use, effectively prohibiting residential and commercial development.[11]

The current City of San Francisco Use District map shows that the project site is divided into two zoning districts: the northern half is zoned RM-3, and the southern half is zoned as a Neighborhood Commercial District (NC-3).[12] The dental clinic is zoned for Public (P) Use. RM-3 districts allow for medium-density residential uses of 6, 8, and 10 or more units. NC-3 districts are moderate-scale neighborhood commercial districts located along heavily trafficked thoroughfares that also serve as major transit routes. Housing development is encouraged above the second story in these districts.

The project site is zoned in three separate height and bulk districts. The northern quarter of the site, comprising Woods Hall, is zoned 40-X (40-foot height limit, no bulk limits). The remainder of the northern half of the site is zoned 50-X. This zoning district extends in an L-shape across the site from east to west, and extends southward to Hermann Street on the west side of the site. The remainder of the project site is zoned 85-X.[13]

The San Francisco Planning Commission approved a Conditional Use authorization for the current Proposed Action on August 16, 2012. [14] Planning Code Section 101.1(b) establishes eight priority-planning policies and requires review of permits for consistency with said policies. A summary of the findings related to Planning Code Priority Policies follows:

8 San Francisco Board of Supervisors. Ordinance 68-08, Laguna, Haight, Buchanan and Hermann Streets Special Use District, http://www.sfbos.org/ftp/uploadedfiles/bdsupvrs/ordinances08/o0068-08.pdf, approved April 17, 2008.

9 San Francisco Board of Supervisors. Ordinance 66-08, General Plan Amendments for Assessors Block 857 and portions of Assessors Block 870 bound by Laguna, Haight, Buchanan and Hermann Streets, http://www.sfbos.org/ftp/uploadedfiles/bdsupvrs/ordinances08/o0066-08.pdf, approved April 17, 2008.

10 San Francisco Board of Supervisors. Ordinance 67-08, Zoning Map Amendments Associated with the Laguna, Haight, Buchanan and Hermann Streets Special Use District, http://www.sfbos.org/ftp/uploadedfiles/bdsupvrs/ordinances08/o0067-08.pdf, approved April 17, 2008.

11 San Francisco Planning Department, *A Policy Guide for Considering Reuse of the University of California Berkeley Extension Laguna Street Campus*, Better Neighborhoods Program, December 2004.

12 San Francisco Planning Department, Zoning Map, available online: http://www.sf-planning.org/index.aspx?page=1569, accessed July 23, 2012.

13 San Francisco Planning Code. available online: http://www.amlegal.com/nxt/gateway.dll/California/planning/planningcode?f=templates$fn=default.htm$3.0$vid=amlegal:sanfrancisco_ca$sync=1e

14 San Francisco Planning Commission Motion No. 18693, approved August 16, 2012, Case No. 2012.0033ACFEU.

- Policy 1 states that existing neighborhood-serving retail uses be preserved and enhanced and future opportunities for resident employment in and ownership of such businesses be enhanced. No existing neighborhood serving retail business would be displaced, and the project would provide about 2,400 square feet of ground floor, neighborhood serving retail uses.

- Policy 2 requires that existing housing and neighborhood character be conserved and protected in order to preserve the cultural and economic diversity of the City's neighborhoods. The four institutional buildings on the site are being maintained by the property owner, UC Regents, but in their current unused condition, do not enhance or augment the neighborhood's cultural or economic diversity. The project would revitalize the site and create housing for a mix of populations, as well as provide retail and community facility space.

- Consistent with Policy 3, which states that the City's supply of affordable housing be preserved and enhanced, the project would would include 110 affordable senior housing units and the family rental project would comply with the Inclusionary Affordable Housing Program per Motion 18427 and Case No. 2011.0450C, by providing on-site below-market-rate units affordable to households earning 55 percent of Area Median Income, consistent with and pursuant to Planning Code Section 415, in the market rate housing element of the project. All senior dwelling units would be affordable to households earning up to a maximum of 50 percent of Area Median Income, pursuant to Planning Code Section 415.3(c)(4)(A)(ii).

- Pursuant to Policy 4 and as concluded in the transportation analysis, commuter traffic generated by the project would not impede MUNI transit service or overburden City streets or neighborhood parking. The project would be well-served by existing transit lines, would include car-sharing and Class I bicycle spaces, and would be located within walking distances of commercial services.

- Policy 5, which relates to industrial and service sector displacement due to commercial office development, is not applicable to the project.

- Consistent with Policy 6, which states that the City should achieve the greatest possible preparedness to protect against injury and loss of life in an earthquake, the project would result in three of the existing buildings being seismically retrofitted in compliance with current Building Codes and engineering/excavation practices for enhanced seismic safety. The new construction would also comply with current Building Codes and engineering/excavation practices for enhanced seismic safety.

- Policy 7 states that landmarks and historic buildings should be preserved. As further explain in this EA in **Section 3.1**, the project would result in the adaptive reuse of these three City landmark buildings, the demolition of the heavily altered Middle Hall and the one-story Administration Wing of Richardson Hall, and the construction of proposed infill buildings. The project would demolish Middle Hall and the Administration Wing of Richardson Hall, as well as the retaining wall along Laguna and Haight Streets. On May 16, 2012, the Historic Preservation Commission approved Certificates of Appropriateness for new façade modifications to Richardson Hall, Woods Hall and Woods Hall Annex. At an appeal hearing on July 31, 2012, the Board of Supervisors upheld the Certificates of Appropriateness.

- The Planning Department determined that Middle Hall, while not individually eligible, would contribute to a potential campus historic district, as would the other three buildings described above, landscape features dating from 1921 – 1955, and the retaining wall along Laguna and Haight Streets. The Planning Department additionally found that, "The new construction would not comply with four out of ten of the Secretary of the Interior's Standards for Rehabilitation (Standards 1, 2, 9, and 10) because the new structures may impact the spatial relationships, including the internally-focused 'quadrangle' design that characterizes the existing campus." The Planning Department found that, on balance, the project would meet the City's preservation goals. MOH concurs with those findings.[15]

- Priority 8 relates to sunlight on public open spaces. The project would provide new open space and would not shade any existing parks or playgrounds.

The project is required to obtain the agency approvals listed in **Chapter 1**, **Mitigation Measure 1.2.8**, **Agency Approvals**, including approval of the conditional use of the site as a modified Planned Unit Development (PUD), transfer of Waller Park and deed restrictions, a Certificate of Appropriateness from the Historic Preservation Commission, and approval of new curb cuts from the Department of Public Works.

4.1.1.2 Preservation Alternative (4—Requires Mitigation)

The Preservation Alternative would result in the same uses as the Proposed Action, but at a lesser density and intensity. These uses would fall within the envelope of the Laguna, Haight, Buchanan and Hermann Streets Special Use District, and they would conform to the requirements of the use and height and bulk zoning districts on the site. The alternative would also conform to the General Plan requirements for the site.

4.1.2 Compatibility and Urban Impact

4.1.2.1 Proposed Action (1—No Impact Anticipated)

Mid-rise apartment buildings surround the project site and are located mostly near major intersections, such as those at Buchanan Street and Duboce Avenue and Market and Laguna Streets and range in height from 4 to 7 stories. Northwest of the project is mixed-income housing in three-story, multi-family buildings. To the north along Haight Street are primarily three- to four-story residential uses; on the northeast corner of Buchanan and Haight Streets is an approximately 80-foot-high apartment building. Adjacent to and south of the site are apartment buildings approximately 50 to 80 feet high that extend the full length of Hermann Street between Buchanan and Laguna Streets, as well as a single-story institutional use.

[15] VerPlanck Historic Preservation Consultants, in its 2012 Historic Property Survey Report (included in **Appendix A**), determined that the proposed action would comply with Secretary of the Interior's Standards for Rehabilitation #1. As explained in **Section 3.1**, to provide a conservative assessment of the proposed action's effects to historic resources, however, the San Francisco Mayor's Office of Housing (MOH) determined that the change of use would result in a change to distinctive materials, features, and spatial relationships of the 55 Laguna Street campus that would fail to comply with Standard #1. The MOH assessment concurs with that of the San Francisco Planning Commission in its August 2012 Conditional Use Authorization for the proposed action (also provided in **Appendix A**).

To the southwest of the site, and diagonally across the intersection of Hermann and Buchanan Streets from the project site, is the approximately 60-foot-tall United States Mint. This large, art deco style structure sits atop an exposed rock base. A grocery store and shopping center is located at Market and Church Streets, with a large surface parking lot facing Market Street. Behind the grocery store, along Duboce Avenue, is a bikeway.

North and east of the project site are a number of non-profit, community-oriented uses. The Healthright 360 women's substance abuse treatment facility is located along Haight Street. Near the intersection of Market Street and Octavia Street, the historic Carmel Fallon Building connects to a modern addition forming the Lesbian, Gay, Bisexual, and Transgender Center (The LGBT Center). The LGBT Center houses non-profit organizations and provides community meeting space, computer labs, a reading room, cafe, and art exhibition space. Across Waller Street from the LGBT Center is the First Baptist Church.

Under the Proposed Action, three educational buildings would be renovated into residential or community facility space and additional residential buildings would be constructed on the site, as well as retail space and open space. (As noted previously, one building and a portion of another would be demolished.) The dental clinic would continue to operate in its current location. The conversion of the project site from institutional uses to multi-family residential—including housing for seniors, convenience retail, and community facility uses—would be compatible with the multi- and single-family residential, convenience retail, community, institutional and mixed uses in the project area.

These uses would build on the established neighborhood pattern by activating a site that is currently vacant. They would not substantially conflict with the surrounding neighborhood uses. Moreover, the Proposed Action would include construction of privately-owned, though publicly-accessible open space, effectively extending Waller Street, which would provide pedestrian access through the site. The Proposed Action would have no adverse effect on the compatibility of the existing urban character.

4.1.2.2 Preservation Alternative (1—No Impact Anticipated)

The Preservation Alternative would occur in the same location as the Proposed Action. Therefore, it would be surrounded by the same existing land uses.

The alternative would result in the renovation of the existing buildings on the project site, as well as construction of five new buildings housing residential, retail, and community-service uses; courtyards; public open space; private open space; and driveways. Overall, the density and intensity of uses under the alternative would be less than those under the Proposed Action. These new uses would not conflict with the existing uses in the surrounding community. There would be no adverse effect.

4.1.3 Slope

4.1.3.1 Proposed Action (4—Requires Mitigation)

The project site slopes steeply downward from northwest to southeast and is divided into two terraces. At its lowest point, the project site is more than 80 feet above sea level.[16]

The project site is not in an area subject to landslide. The project site is also outside officially mapped seismic hazard zones susceptible to liquefaction or earthquake-induced landslides.[17]

A preliminary geotechnical analysis prepared for the Proposed Action in March 2012 recommends the following:

- Excavations deeper than 5 feet that will be entered by workers should be shored or sloped for safety in accordance with the Occupational Safety and Health Administration (OSHA) standards (29 CFR Part 1926). Inclinations of temporary slopes should not exceed those specified in local, state or federal safety regulations. As a minimum, the requirements of the current OSHA Health and Safety Standards for Excavations (29 CFR Part 1926) should be followed. The Contractor should determine temporary slope inclinations based on the subsurface conditions exposed at the time of construction. However, temporary slopes should be no steeper than 2:1 in sandy fill / Dune sand, and 1:1 in stiff clay / rock.

- If temporary slopes are open for extended periods of time, exposure to weathering and rain could result in sloughing and erosion. All vehicles and other surcharge loads should be kept at least 10 feet away from the tops of temporary slopes and the slopes be protected from either excessive drying or saturation during construction.

- Permanent cut and fill slopes should be no steeper than 2:1 in sandy fill, Dune sand and stiff clay, and 1.5:1 in competent rock. A geologist / field engineer should determine the competency of the rock during construction.[18,19]

The project sponsor's adherence to the finalized geotechnical recommendations, pursuant to **Mitigation Measure 1.2.6**, **Geotechnical Investigation**,would ensure that there would be no adverse effects related to slope stability.

16 San Francisco Planning Department. *55 Laguna Mixed Use Project Draft Environmental Impact Report, Appendix A, Initial Study*, Planning Department Case No. 2004.0773E, State Clearing House No. 2005062084, January 27, 2007.

17 California Department of Conservation. *State of California Seismic Hazard Zones, City and County of San Francisco, Official Map,* Division of Mines and Geology, http://gmw.consrv.ca.gov/shmp/download/pdf/ozn_sf.pdf, November 7, 2000.

18 San Francisco Public Utilities Commission and Port of San Francisco, San Francisco Stormwater Design Guidelines, November, 2009. Adopted by the SFPUC Commission January 12, 2010. http://sfwater.org/index.aspx?page=446.

19 San Francisco Board of Supervisors, Stormwater Management Ordinance: Ordinance 83-10, approved April 13, 2010, and signed by the Mayor April 22, 2010: http://www.sfbos.org/ftp/uploadedfiles/bdsupvrs/ordinances10/o0083-10.pdf.

Preservation Alternative (4—Requires Mitigation)

The Preservation Alternative would occur at the same site as the Proposed Action. Adherence to the recommendations of the geotechnical investigation pursuant to **Mitigation Measure 1.2.6, Geotechnical Investigation**, would ensure that there would be no adverse effects related to slope stability.

4.1.4 Erosion

4.1.4.1 Proposed Action (4—Requires Mitigation)

The project site is almost entirely covered by structures and pavement. Therefore, the project would not substantially affect the area of impervious surface at the site or adversely alter site drainage.[20] Because the project would be designed to meet current standards, the project could potentially improve drainage conditions on the site. Project-related wastewater and storm water would continue to flow to the City's combined sewer system and would be treated to standards contained in the City's National Pollutant Discharge Elimination System (NPDES) permit for the Southeast Water Pollution Control Plant prior to discharge.

In accordance with the San Francisco Stormwater Management Ordinance, approved in April 2010, development projects that discharge stormwater to the combined sewer system—which includes the project site—must comply with the San Francisco Stormwater Design Guidelines developed by the SFPUC and the Port of San Francisco.[21,22] In combined sewer areas under SFPUC jurisdiction, which include the area around the project site, project applicants are required to reduce the storm water flow rate and volume by achieving Leadership in Energy and Environmental Design (LEED) Sustainable Sites Credit 6.1 and prepare and demonstrate compliance with a Stormwater Control Plan, which must include the following steps:

1) Characterize existing site conditions
2) Identify design and development goals
3) Develop a site plan
4) Develop a site design
5) Select and locate source controls
6) Select and locate treatment BMPs
7) Size treatment BMPs
8) Check against design goals and modify as necessary
9) Develop an operations and maintenance plan
10) Compile the Stormwater Control Plan.

During operations, the project would comply with all local wastewater discharge requirements, which limit industrial waste discharges of arsenic, cadmium, chromium, copper, lead, mercury,

20 San Francisco Planning Department. *55 Laguna Mixed Use Project Draft Environmental Impact Report, Appendix A, Initial Study*, Planning Department Case No. 2004.0773E, State Clearing House No. 2005062084, January 27, 2007.

21 San Francisco Public Utilities Commission and Port of San Francisco, San Francisco Stormwater Design Guidelines, November, 2009. Adopted by the SFPUC Commission January 12, 2010. http://sfwater.org/index.aspx?page=446.

22 San Francisco Board of Supervisors, Stormwater Management Ordinance: Ordinance 83-10, approved April 13, 2010, and signed by the Mayor April 22, 2010: http://www.sfbos.org/ftp/uploadedfiles/bdsupvrs/ordinances10/o0083-10.pdf.

nickel, silver, zinc, and cyanide; as well as set parameters on pH, sulfides, temperature, and oil and grease content.[23]

As indicated above in the discussion of slope, construction activities could expose slopes to erosion for a temporary period.[24] However, requirements to reduce erosion would be implemented pursuant to the San Francisco Stormwater Management Ordinance and **Mitigation Measure 1.2.6, Geotechnical Investigation**. The effect would not be adverse.

4.1.4.2 Preservation Alternative (4—Requires Mitigation)

The Preservation Alternative would occur in the same location as the Proposed Action. Construction activities would adhere to the same management standards and finalized geotechnical recommendations of **Mitigation Measure 1.2.6, Geotechnical Investigation**, and erosion effects would not be adverse.

4.1.5 Soil Suitability

4.1.5.1 Proposed Action (4—Requires Mitigation)

A preliminary geotechnical consultation prepared for the project site indicates that the site is underlain primarily by fill, dune sand, sand and clay, and bedrock.

The project site pavement of 1 to 4 inches is underlain by 3 to 7 inches of aggregate base. Fill comprises 1 to 8 feet of loose- to medium-density sand with silt and clay. The fill is thickest behind the site retaining walls and north of the dental clinic building. The fill was likely placed before the 1940s, and there are no records regarding compaction or its placement.

Dune sand underlies the fill in some places. The sand is loose to medium in density, clean, and fine-grained. It is 2 to 4 feet thick, except in the northeast corner of the site where it is about 10 feet thick.

Directly beneath the pavement or beneath the fill and dune sand is medium-dense to dense clayey sand; stiff to hard clay and sandy clay; or dense to very dense gravel. The clay, sand, and gravel, where encountered in the borings, vary from 1 to 17 feet in thickness. About four feet of medium-stiff clay of moderate-to-high plasticity was encountered beneath the fill in one of the borings drilled at the southeast corner of Richardson Hall; the clay is likely topsoil that was not removed during the original site grading.

The Franciscan Mélange bedrock consists of a mixture of serpentinite, shale, and sandstone. The bedrock is deeply to completely weathered, low to moderately hard, friable to moderately strong. Bedrock was encountered between 2 and 27 feet below the surface, with the large variation in depth to rock likely due to previous cut and fill site grading to create the two level terraces.

[23] SFPUC, San Francisco Department of Public Works Order No. 158170, Industrial Waste Discharge Limits into City's Sewerage System, 2008; Industrial Waste Ordinance No 19-92, 2008.

[24] Treadwell & Rollo. *Preliminary Geotechnical Investigation, 55 Laguna Street, San Francisco, CA,* March 6, 2012.

The preliminary investigation concluded that the project is feasible from a geotechnical standpoint.[25] It also concluded the following:

- The potential for liquefaction or lateral spreading is low.
- Earthquake-induced ground densification would not affect the performance of the proposed structures if recommendations are followed.
- The risk of surface faulting and secondary ground failure is low.
- Existing fill and dune sand are not suitable for foundation support, but the proposed buildings may be supported on conventional spread footings on native stiff clay, bedrock, or improved soil. Alternatively, drilled piers could be used to support the portions of buildings underlain by deep fill and dune sand.

Pursuant to **Mitigation Measure 1.2.6, Geotechnical Investigation**, the project sponsor would prepare a design-level geotechnical investigation for the Proposed Action. The report and recommendations would be reviewed and approved by the San Francisco Department of Building Inspection (DBI) prior to construction Effects would not be adverse.

4.1.5.2 Preservation Alternative (4—Requires Mitigation)

The Preservation Alternative would be located at the same site as the Proposed Action and have the same existing soil characteristics. Although the alternative would result in a different configuration of buildings than the Proposed Action, preliminary geotechnical considerations discussed above would be applicable. Final recommendations of a geotechnical investigation would be prepared with final project design, and recommendations would be followed as conditions of approval in pursuant to **Mitigation Measure 1.2.6, Geotechnical Investigation**. The effect would not be adverse.

4.1.6 Hazards and Nuisances Including Site Safety

4.1.6.1 Proposed Action (4—Requires Mitigation)

Seismicity

The major active faults in the area are the San Andreas, Hayward, and San Gregorio Faults, all of which are between 6 and 25 miles from the project site. Since 1800, four major earthquakes have been recorded on the San Andreas Fault. The most recent significant earthquake to affect the Bay Area was the Loma Prieta Earthquake of October 17, 1989, in the Santa Cruz Mountains, approximately 55 miles from the site. The 2007 Working Group on California Earthquake Probabilities (WGCEP) at the U.S. Geologic Survey (USGS) predicted a 63 percent chance of a magnitude 6.7 or greater earthquake occurring in the San Francisco Bay Area in 30 years.

[25] Treadwell & Rollo. *Preliminary Geotechnical Investigation, 55 Laguna Street, San Francisco, CA,* March 6, 2012.

Treadwell & Rollo analyzed the seismic risks associated with the Proposed Action, and determined that during a major earthquake on a segment of one of the nearby faults, very strong to violent ground shaking is expected to occur at the project site. Strong shaking during an earthquake can result in ground failure such as that associated with soil liquefaction, lateral spreading, and seismically induced densification.[26]

As discussed above, under "Slope," the site is not within a designated liquefaction zone as mapped by the California Division of Mines and Geology. Considering the groundwater level is near the top of the bedrock, the potential for liquefaction and lateral spreading at the project site is low. In addition, the majority of the soil that would be susceptible to densification during an earthquake would be removed during site grading to develop the proposed building pads. Where potentially densifiable soil remains, foundation slabs would be structurally supported, as recommended by the geotechnical investigation.

Pursuant to local building code requirements and **Mitigation Measure 1.2.6, Geotechnical Investigation**, final geotechnical recommendations, reviewed and approved by the Department of Building Inspection, would be followed as conditions of approval.

Hazards

As discussed above under "Toxic/Hazardous Substances," the project sponsor would follow the recommendations of the 2004 Phase I and Limited Phase II environmental site assessment prepared for the project site, which has been reviewed by the San Francisco Department of Public Health (DPH) for accuracy.[27] Because of elevated concentrations of lead and asbestos detected at the project site, a soil management plan (SMP) and a Health and Safety Plan (HSP) would be required prior to construction for use during site excavation to reduce worker and public exposure to these compounds. The SMP would include a soil-handling plan that segregates Class I from Class II or III fill material and isolates fill material from the underlying native soil. The HSP would outline proper handling procedures and health and safety requirements to minimize worker and public exposure to hazardous materials during construction. During construction, on-site observation of soil stockpiling and sample collection should be performed for a more focused disposal characterization of the soil schedule for off-site disposal. These requirements have been incorporated into the project as **Mitigation Measure 1.2.3, Soil Management Plan and Health and Safety Plan**.

SMPs and HSPs are monitored and regulated by DPH. The project sponsors would develop these plans, which would be reviewed and approved by DPH prior to construction, as required by the City.[28,29]

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[26] Treadwell & Rollo. *Preliminary Geotechnical Investigation, 55 Laguna Street, San Francisco, CA,* March 6, 2012.
[27] Treadwell & Rollo, Inc. *Phase I and Limited Phase II Environmental Site Assessment, 55 Laguna Street, San Francisco, California*, September 10, 2004.
[28] San Francisco Planning Department. *55 Laguna Mixed Use Project Draft Environmental Impact Report, Appendix A, Initial Study*, Planning Department Case No. 2004.0773E, State Clearing House No. 2005062084, January 27, 2007.
[29] Mercy Housing California, personal communication to Mayor's Office of Housing RE: 55 Laguna DPH VRAP Letter, July 24, 2012.

4.1.6.2 Preservation Alternative (4—Requires Mitigation)

The Preservation Alternative would occur at the same site as the Proposed Action. As under the Proposed Action, under the Preservation Alternative the project sponsors would prepare an SMP and HSP, which would be reviewed and approved by DPH prior to any construction activities. The alternative could also require abatement of hazardous building materials in accordance with the protocols described above. **Mitigation Measure 1.2.3, Soil Management Plan and Health and Safety Plan,** would apply.

Implementation of **Mitigation Measure 1.2.6, Geotechnical Investigation,** would ensure that seismic-related hazards are not adverse.

4.1.7 Energy Consumption

4.1.7.1 Proposed Action (1—No Impact Anticipated)

The Proposed Action would include construction of new residential units, community facility space, convenience retail, open space, and parking areas. Development of these uses would consume energy, but these uses would not result in the use of large amounts of fuel, water, or energy in the context of energy use throughout the City and region. According to HUD, the average multi-family household unit consumes 64.14 million BTUs annually, and single-family dwellings consume an average of 106.58 million BTUs, nationwide.[30] Therefore, the project's multi-family residential buildings would consume less energy than the same number of units constructed in detached housing.

The project demand would be typical for a development of this scope and nature and would comply with current State and local codes concerning energy consumption, including Title 24 of the California Code of Regulations enforced by the Department of Building Inspection. The project sponsors are seeking Leadership in Energy and Environmental Design-Neighborhood Design (LEED-ND) certification, which would reduce energy demand compared to traditional developments through building materials and fixtures selection, environmental systems design, and construction efficiency measures.

The project site is served by existing utilities that are already installed, and it would not in and of itself require a major expansion of power facilities. In addition, the project site is located in a developed urban area. As described below in **Section 4.3.11**, the area is well-served by the San Francisco Municipal Transportation Agency transit systems, including lines on Market Street and Haight Street. Use of this transit system by project residents and visitors would reduce the amount of energy expended in private automobiles.

Therefore, the energy demand associated with the Proposed Action would not result in an adverse environmental effect.

[30] United States Department of Housing and Urban Development (HUD), *Evidence Matters* Newsletter, Summer 2011, available online: http://www.huduser.org/portal/periodicals/em/EM_Newsletter_Summer_2011_FNL.pdf.

4.1.7.2 Preservation Alternative (1—No Impact Anticipated)

The Preservation Alternative would result in the same uses as the Proposed Action at the same project site, but at an overall reduced density and intensity. These uses would not result in the use of large amounts of fuel, water, or energy in the context of energy use throughout the City and region. Energy demand would be typical for this type of development in an urbanized area, and there would be no adverse effect.

4.1.8 Noise—Contribution to Community Noise Levels

4.1.8.1 Proposed Action (4—Requires Mitigation)

Construction

Construction activities—potentially including hard rock hammering, excavation and hauling, foundation construction, frame erection, and finishing—would temporarily increase noise in the project site vicinity. Construction noise levels would fluctuate depending on equipment type and duration of use, distance between noise source and listener, and presence or absence of barriers. Interior construction noise would be substantially reduced by the exterior walls. The proposed new buildings and parking garages would be constructed on a concrete mat foundation that would not require pile driving. Seismic-related construction would occur within all the existing buildings proposed for renovation.

Pursuant to **Mitigation Measure 1.2.4, Noise Reduction**, construction of the Proposed Action would adhere to the requirements of the San Francisco Noise Ordinance (Article 29 of the Police Code).

Traffic Noise

Generally, traffic must double on adjacent streets in order to produce a noticeable increase in noise levels. Although the Proposed Action would increase traffic volumes, traffic volumes would not double on any nearby streets as a result of the Proposed Action. As discussed in Section 4.3.11, below, the project would generate 192 peak hour trips to and from the project site, compared to an existing (2006) peak hour volume of 379 vehicles on Buchannan Street and 725 peak hour vehicles on Laguna Street.

Building Equipment Noise

The Proposed Action would include construction of buildings and their associated mechanical equipment, such as HVAC units, which could produce operational noise. These operations would be subject to San Francisco Noise Ordinance, Article 29, Section 2909, which limits noise from building operations. Given the existing background noise levels in the area, operational noise from the Proposed Action would not be expected to be noticeable.[31,32]

[31] United States Department of Housing and Urban Development. 24 CFR Part 51 – Environmental Criteria and Standards, Subpart B – Noise Abatement and Control, available online: http://www.hudnoise.com/hudstandard.html, accessed March 23, 2012.

[32] United States Department of Housing and Urban Development (HUD). *The Noise Guidebook*, updated August 20, 2004.

4.1.8.2 Preservation Alternative (4—Requires Mitigation)

Construction noise effects under the Preservation Alternative would be similar to those under the Proposed Action, and addressed by **Mitigation Measure 1.2.4, Noise Reduction**. Although the Preservation Alternative would not generate noise from building demolition, it would generate noise from more extensive building renovations, as well as new construction. Alternative construction operations would comply with the San Francisco Noise Ordinance requirements, described above.

Regarding traffic noise, the Preservation Alternative would generate fewer daily trips than the Proposed Action. Therefore, the Preservation Alternative would result in less traffic volume than the Proposed Action, and traffic noise effects would not be adverse.

Given that the Preservation Alternative would result in overall lesser density and intensity of development, building equipment noise effects would be similar to, or less than, those under the Proposed Action.

4.1.9 Air Quality—Effects of Ambient Air Quality on Project and Contribution to Community Pollution Levels

4.1.9.1 Proposed Action (1—No Impact Anticipated)

As discussed in the 2008 EIR in Section III.3.D, Air Quality, page III.D-13, emissions generated by the project that was proposed in 2008 would be below the thresholds established by the Bay Area Air Quality Management District (BAAQMD) that would indicate a significant impact to regional air quality.[33] The Proposed Action would result in fewer daily trips than those analyzed in the 2008 EIR and, consequently, fewer emissions. **Table 4-1** presents an updated inventory of project emissions using the revised trip generation and the CalEEMod emissions estimator model. As indicated in this table, these emissions would be below the most recent unchallenged thresholds of the BAAQMD from its 1999 CEQA Air Quality Guidelines. The effect would not be adverse.

For construction activities, the San Francisco Dust Control Ordinance (Ordinance 176-08) would reduce the quantity of dust generated by site preparation, demolition, and construction work in order to protect the health of the general public and on-site workers, minimize public nuisance complaints and avoid orders to stop work by the Department of Building Inspection.

In February 2010, the Council on Environmental Quality (CEQ) provided a draft guidance memorandum on consideration the effects of climate change and greenhouse gas emissions (GHG) in NEPA documentation (CEQ 2010). This document identifies the Clean Air Act reporting requirement of 25,000 metric tons (MT) or more of carbon dioxide equivalents (CO2e) as an indication that greenhouse gas emissions could be considered as potential adverse impact of a federal action but specifies that the reporting requirement should not, necessarily, be used as a threshold.

[33] Bay Area Air Quality Management District (BAAQMD). *1999 CEQA Air Quality Guidelines*, adopted 1999, available at www.baaqmd.gov.

TABLE 4-1
MAXIMUM DAILY OPERATIONAL EMISSIONS FOR THE PROPOSED ACTION

	Maximum Daily Emissions (pounds/day)			
	ROG	**NOx**	**PM10**	**CO**
2013				
Area Emissions	16.23	0.45	0.40	37.90
Energy Emissions	0.45	1.18	0.10	0.50
Vehicle Emissions	7.97	14.82	11.06	68.00
2013 Total	24.34	16.45	11.56	106.40
Adopted BAAQMD Threshold	80	80	80	550
Above Threshold?	No	No	No	No

NOTE: ROG= reactive organic gases; NOx= oxides of nitrogen; PM10 =particulate matter with a diameter less than 10 microns; CO= carbon dioxide. Thresholds are the most recent legally binding adopted thresholds of the BAAQMD from the 1999 Air Quality Guidelines.

GHG emissions associated with the revised project were calculated using the CalEEMod emissions estimator model. Project emissions are presented in **Table 4-2**. Project GHG emissions would be 2,107 metric tons of carbon dioxide equivalents per year, which would be less than 10 percent of the Clean Air Act reporting limit of 25,000 metric tons per year.[34] Therefore the project would not have a substantial effect on global GHG emissions and climate change.

TABLE 4-2
MAXIMUM ANNUAL GREENHOUSE GAS EMISSIONS FOR THE PROPOSED ACTION

Source	**Emissions (metric tons CO_2e per year)**
Unmitigated Emissions	
Motor Vehicle Trips	1,584
Energy	308
Solid Waste	92
Other Sources (i.e., Area Sources, Water/Wastewater)	122
Total Unmitigated Operational GHG Emissions	2,107
Clean Air Act Reporting Limit	*25,000*
Significant (Yes or No)?	***No***

Additionally, these emissions would occur in the jurisdiction of the City and County of San Francisco. San Francisco's Strategies to Address Greenhouse Gas Emissions identifies the City's actions to pursue cleaner energy, energy conservation, alternative transportation, and solid waste policies, and concludes that the City's policies have resulted in a reduction in greenhouse

[34] Council on Environmental Quality (CEQ). *Draft NEPA Guidance on Consideration of the Effects of Climate Change and Greenhouse Gas Emissions*, 2010.

gas emissions below 1990 levels.[35] The local air district (BAAQMD) reviewed San Francisco's Strategies to Address Greenhouse Gas Emissions and concluded that the strategy meets the criteria for a Qualified GHG Reduction Strategy. Therefore GHG emissions would be further reduced below those estimated in **Table 4-2**.

4.1.9.2 Preservation Alternative (1—No Impact Anticipated)

The Preservation Alternative would result in fewer daily trips than the Proposed Action, and, consequently, fewer emissions**.** Therefore, operational emissions would be below those of the proposed project, shown in **Table 4-1**. Emissions would be the most recent unchallenged thresholds of the BAAQMD from their 1999 CEQA Air Quality Guidelines. The effect would not be adverse. Similarly, operational greenhouse gas emissions would be below those of the Proposed Action, presented in **Table 4-2**. Therefore the project would not have a substantial effect on global GHG emissions and climate change.

As under the Proposed Action, the San Francisco Dust Control Ordinance (Ordinance 176-08) would apply to the Preservation Alternative. Adherence to the ordinance during construction activities would protect the health of the general public and on-site workers and minimize public nuisance complaints and avoid orders to stop work by the Department of Building Inspection.

4.1.10 Environmental Design—Visual Quality, Coherence, Diversity, Compatible Use and Scale

4.1.10.1 Proposed Action (1—No Impact Anticipated)

The Proposed Action would result in the removal and demolition of Richardson Hall Administration Wing, Middle Hall, surface parking lots, landscape elements, blank street-level retaining walls, and chain-link fencing. The project would replace these elements with a mixed-use development comprising a diversity of uses, including new residential buildings between one and seven stories in height, offices, retail spaces, and new public and private open spaces. It would retain and rehabilitate Woods Hall, Woods Hall Annex, and Richardson Hall. Future building designs would be developed pursuant to the city's General Plan, including the Market and Octavia Area Plan and *A Policy Guide to Considering Reuse of the University of California Berkeley Extension's Laguna Street Campus,* as well as the City's Residential Design Guidelines.

The Proposed Action would be a continuation of the dense and urban visual character currently found in the site vicinity, including the residential, retail, office, and open spaces uses in the Upper Market and Hayes Valley neighborhoods. Although the proposed buildings would be larger in footprint and taller than most of the existing buildings in the immediate vicinity, these changes would not result in an adverse effect on visual quality. Several mid-rise apartment

[35] San Francisco Planning Department. *Strategies to Address Greenhouse Gas Emissions in San Francisco*, available on the Internet at http://www.sfplanning.org/index.aspx?page=1570, 2010.

buildings surround the project site, located at 1900 Market Street, 78 and 300 Buchanan Street, 50 Waller Street, and 16 and 50 Laguna Street.

In addition, the project site slopes steeply downward from its highest elevation at the corner of Buchanan and Haight Streets to its lowest elevation at the corner of Hermann and Laguna Streets. The taller buildings would be constructed on the lower half of the project site, with the hill behind these buildings providing a visual backdrop when looking in a westerly direction and reducing their effective height in views from the north and west. The construction of Waller Park through the site would provide a continuation and visual connection to the street to the west.[36]

Project buildings would be designed to complement and reflect the existing urban form. For example, buildings on Buchannan Street would be set back after the first two stories to reflect the roofline of surrounding properties. Similarly, the first story of the Openhouse Building, on the façade facing Laguna Street, would align with the top of the retaining wall along the eastern façade of Richardson Hall.

The Proposed Action would remove the trees on the project site, but no landmark trees would be removed (see "Vegetation and Wildlife," below). The "Sacred Palm" would be retained and replanted on site. The intersection of Market / Laguna / Hermann Streets would be enlivened with new retail uses, as well as glazing and new street trees.

The proposed new buildings would be designed to complement the architectural character of the remaining Landmark buildings, and the surrounding neighborhood. The overall variation of building heights is intended to relate to the size and scale of buildings across Buchanan and Laguna Streets while accounting for the site's topography.[37]

The increase in development density and height, as well as the increased intensity of use, on the project site, while noticeable, would not substantially degrade the existing visual character or scenic resources of the site or its surroundings. There would be no adverse effect.

4.1.10.2 Preservation Alternative (1—No Impact Anticipated)

The alternative would retain and rehabilitate Woods Hall, Woods Hall Annex, and Richardson Hall. In contrast to the Proposed Action, Middle Hall and the Richardson Hall Administration Wing would be retained and rehabilitated, as well. Five new buildings would be constructed in areas of the project site currently devoted to surface parking lots and landscaping. All of the buildings would be between three and four stories, except for an eight-story building northwest of Richardson Hall that would house the 79 senior affordable units.

The alternative would result in a dense built form similar to that of the surrounding urbanized area. The site massing would step down along the perimeter to three- and four-story buildings,

[36] San Francisco Planning Department. *55 Laguna Mixed Use Project Draft Environmental Impact Report*, Planning Department Case No. 2004.0773E, State Clearing House No. 2005062084, January 27, 2007.

[37] San Francisco Planning Commission Draft Motion, hearing date: august 16, 2012, *Case No.:* 2012.0033 ACFEU.

which would be generally consistent with the height and bulk of surrounding development. The new eight-story building northwest of Richardson Hall would be slightly taller than surrounding development, but it would be built into the hillside in a similar manner to the buildings of the Proposed Action, described above.

Under the alternative, the view along Waller Street would remain unobstructed by buildings. The portion of Waller Street near Laguna Street would be paved as a driveway to the underground parking lots. The remainder of Waller Street would be landscaped as open space, similar to the Proposed Action.

The buildings would be designed to complement and reflect the existing urban form. Trees on the project site would be removed, but the "Sacred Palm" would be retained and replanted.

The alternative would result in an overall increase in development density and height, as well as the increased intensity of use, on the project site. These changes would not degrade the existing visual character or scenic resources of the site or its surroundings. There would be no adverse effect.

4.2 Socioeconomic

4.2.1 Demographic Character Changes

4.2.1.1 Proposed Action (1—No Impact Anticipated)

The Proposed Action would provide market-rate and affordable housing units on the project site, where no residential uses currently exist.

In general, a project would be considered growth-inducing if its implementation would result in substantial population increases and/or new development that might not occur if the project were not implemented. The 2010 U.S. Census indicates that the household population of the project's census tract, Census Tract 168.01, is approximately 3,177 persons in 1,634 households, for an average household size of 1.94 persons.[38]

Based on this 1.94-persons-per-household average, the project would increase the overall residential population of the project site by 854 persons.

This increase in population is small in comparison to the City and County of San Francisco as a whole. Moreover, the senior development component of the project is intended to provide housing for existing LGBT seniors already living in San Francisco. Therefore, the Proposed Action would add to the supply of housing in the city, helping to satisfy an existing demand for housing.

It is not anticipated that the project would, in and of itself, generate new demand for housing.

[38] United States Census Bureau. "Profile of General Population and Housing Characteristics: 2010," DP-1, availabe online: http://factfinder2.census.gov/faces/tableservices/jsf/pages/productview.xhtml?fpt=table

While the Proposed Action would result in localized population growth at the project site, its population effects would not be considered substantial in the context of the surrounding urban neighborhood or in the context of the city as a whole. The project's residential density would fall within the range of densities in the census blocks immediately surrounding the project site; project density, relative to the size of its site, would be greater than residential densities of the predominately small-scale, fine-grain single- and multi-family uses to its east (e.g., along blocks along Buchanan and Webster Streets); similar in density to other existing residential developments nearby (e.g., the Church Street Apartments at Church and Hermann Streets); and lower than the relative densities of multi-family apartment buildings located adjacent to the site's perimeter (e.g., 300 Haight Street, 55 Hermann Street, and 1900 Market Street).[39]

4.2.1.2 Preservation Alternative (1—No Impact Anticipated)

The alternative would increase the supply of housing in San Francisco, and it is not anticipated to generate new demand for housing.

The Preservation Alternative would result in 332 new residential units. Based on the 1.94-persons-per-household average for Census Tract 168.01, the alternative would increase the overall residential population of the project site by 644 persons, or 210 persons fewer than the Proposed Action. This localized population growth would not be considerable in the context of the surrounding urban neighborhood nor the city as a whole. The effect would not be adverse.

4.2.2 Displacement

4.2.2.1 Proposed Action (1—No Impact Anticipated)

The Uniform Relocation Act (URA), passed by Congress in 1970, establishes minimum standards for federally-funded programs and projects that require the acquisition of real property (real estate) or displace persons from their homes, businesses, or farms.[40]

Section 205 of the URA requires, "Programs or projects undertaken by a federal agency or with federal financial assistance shall be planned in a manner that (1) recognizes, at an early stage in the planning of such programs or projects and before the commencement of any actions which will cause displacements, the problems associated with the displacement of individuals, families, businesses, and farm operations, and (2) provides for the resolution of such problems in order to minimize adverse impacts on displaced persons and to expedite program or project advancement and completion."[41,42]

39 San Francisco Planning Department. *55 Laguna Mixed Use Project Draft Environmental Impact Report*, Planning Department Case No. 2004.0773E, State Clearing House No. 2005062084, January 27, 2007.
40 United States Code. *Uniform Relocation Act*. 49 CFR Part 24. (a) (11).
41 United States Code. Title 42--The Public Health And Welfare, Chapter 61 -- Uniform Relocation Assistance and Real Property Acquisition Policies for Federal and Federally Assisted Programs, available online: http://www.law.cornell.edu/uscode/text, accessed March 2012.
42 United States Code. Section 4601, Uniform Relocation Act. Section 101(6)(B).

The Proposed Action involves the demolition and renovation of existing buildings for new uses. However, these buildings are unoccupied, and have been so for several years. Therefore, implementation of the Proposed Action would not displace occupants, residents, or employees.[43]

4.2.2.2 Preservation Alternative (1—No Impact Anticipated)

The Preservation Alternative would occur in the same location as the Proposed Action. The alternative would involve the renovation of existing buildings and construction of new buildings. Existing buildings affected by the alternative are currently vacant. Therefore, the alternative would not displace occupants, residents, or employees.

4.2.3 Employment and Income Patterns

4.2.3.1 Proposed Action (2—Potentially Beneficial)

The U.S. Census 2006–2010 American Community Survey indicates that 2,368 residents of Census Tract 168.01 are in the labor force. The median household income (in 2010 dollars) of the census tract was $72,234, and 3.3 percent of families were below the poverty level. The City and County of San Francisco had an unemployment rate of 9.1 percent in December 2010, which decreased to 8.1 percent by January 2012.[44,45]

The project site is currently vacant and therefore there are no employees at the portion of the site that would be affected by the project. The Proposed Action would increase net employment at the site about 23 employees.[46]

The project would not affect the number of employees at the Dental Clinic.

The expected income range of residents of the Alta Laguna LLC component is not known, but residents of the 110 units of the senior development component would need to fall within the category of "extremely-low income" in order to qualify for tenancy at the project site.

The Proposed Action would result in an increase, however small, to the employment and income patterns of the area.

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43 United States Department of Housing and Urban Development. *Real Estate Acquisition and Relocation Policy and Guidance: HUD Handbook 1378.* s.l. : Community Planning and Development, October 27, 2008. 49 CFR Part 24 Section 2, Definitions Covering Section 104(d) Requirements Sub Sections 7-7.

44 United States Bureau of Labor Statistics, Labor force data by county, not seasonally adjusted, December 2010, available online: http://www.bls.gov/lau/laucntycur14.txt, accessed March 2012.

45 United States Census Bureau. "Selected Economic Characteristics, 2006 – 2010," American Community Survey 5-year Estimates, DP03, available online: http://factfinder2.census.gov/faces/nav/jsf/pages/searchresults.xhtml?ref=geo&refresh=t.

46 Assumes 1 employee per 350 square feet of retail space, 1 employee per 276 feet of office space, 2 employees for the community center, and 4 additional on-site employees for maintenance and security, pursuant to guidance from the San Francisco Planning Department. *Transportation Impact Analysis Guidelines for Environmental Review*, October 2002.

4.2.3.2 Preservation Alternative (2—Potentially Beneficial)

The Preservation Alternative would occur in the same location as the Proposed Action. Therefore, it would not displace existing employees, and it would result in an overall net increase in employment at the project site.

The alternative would result in the same uses as the Proposed Action, but at an overall lower density. The residents of the 79 senior affordable units would need to fall within the category of "extremely-low income" in order to quality for tenancy at the project site.

The alternative would not result in an adverse effect to employment or income patterns.

4.3 Community Facilities and Services

4.3.1 Educational Facilities

4.3.1.1 Proposed Action (1—No Impact Anticipated)

The decade-long decline in enrollment at San Francisco Unified School District (SFUSD) ended in the 2008–2009 school year. According to SFUSD, elementary school enrollments will increase to 28,456 in 2014 from 25,923 in 2009. In the same 5-year span, middle school enrollment will increase to 12,243 from 11,640, and high school enrollment will decrease to 18,416 from 19,611.[47]

SFUSD currently uses a diversity index lottery system to assign students to schools based on a number of factors including parental choice, school capacity, and special program needs.[48] Under the diversity index lottery system the students generated by the Proposed Action may attend a SFUSD school other than the nearest schools; however, that school would have to have capacity. Thus, the assumption that all students generated by the Proposed Action would attend the nearest school is a conservative assumption of the impact on the students' default school assignment.

According to a 2010 SFUSD enrollment study, market-rate condominiums contain virtually no public school students.[49] According to the same study, SFUSD has a K–12 student yield 0.81 of students per affordable non-senior occupied unit. Statewide yield factors are 0.7 students per dwelling unit, which would yield 231 new students for SFUSD. However, given the majority of units would be studio and one-bedroom units, and given the lower student yield for market-rate units, it is likely that the student yield of the Alta Laguna LLC component would be much lower.[50]

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47 Lapkoff & Gobalet Demographic Research, Inc. *Demographic Analysis and Enrollment Forecasts for the San Francisco Unified School District*, http://www.sfusd.edu/en/assets/sfusd-staff/enroll/files/DemographicReport3182010.pdf, March 18, 2010.

48 SFUSD, History of the Student Assignment Method, available online at: http://portal.sfusd.edu/apps/departments/educational_placement/HistoryStudentAssignment.pdf, 2011.

49 Lapkoff & Gobalet Demographic Research, Inc. *Demographic Analysis and Enrollment Forecasts for the San Francisco Unified School District*, March 18, 2010.

50 California State Allocation Board. *Enrollment Certification / Projection*, Office of Public School Construction. Available online: http://www.applications.opsc.dgs.ca.gov/ab1014/sab50-01instructions.pdf, accessed March 28, 2012.

Tenants of the senior development component of the project are not expected to include families with children, and therefore the senior development component is not expected to have any effect on schools in the San Francisco Unified School District.[51]

The proposed development would not result in additional school age children that would exceed capacity of schools in the area. New development, such as the Proposed Action, is required to pay school impact development fees which would go directly to the SFUSD to fund staffing and facilities and reduce the impacts of new development. There would not be an adverse effect on primary educational facilities.

The project site was formerly UC Extension campus. However, educational uses have not been at the project site since 2002. The existing dental clinic at the southwest corner of the project site would remain with implementation of the Proposed Action. Therefore, the Proposed Action would not affect secondary educational facilities, and project site populations could positively benefit from proximity to services.

4.3.1.2 Preservation Alternative (1—No Impact Anticipated)

The Preservation Alternative would result in 332 units, or 108 fewer units than the Proposed Action. Units would comprise 79 senior affordable units and 253 market-rate units. The distribution of studio, one-bedroom, and two-bedroom units would be proportional to the distribution of the Proposed Action. The alternative would generate fewer students than the Proposed Action, and it would not adversely affect educational facilities.

4.3.2 Commercial Facilities

4.3.2.1 Proposed Action (1—No Impact Anticipated)

The neighborhoods around the project site include various land use types, including several retail establishments on Hayes Street, Haight Street, and Market Street. In addition, the Proposed Action would include construction of a retail space at the corner of Hermann Street and Laguna Street, in the basement of the existing Richardson Hall. Although it cannot be known at this time what specific commercial enterprises would be located in this space, possible types of businesses might include a coffee shop, café, or corner market.

The residents would contribute to the ongoing vitality of commercial facilities. Given the project's location near the Market Street, Hayes Valley, and Lower Haight major retail corridors—including the grocery store between Market, Dolores, and Church Streets—there would be adequate and convenient access to retail services from the project site that would meet the needs of the project occupants.

In addition, since the project site is currently vacant, existing retail and commercial services would not be adversely affected or displaced by the Proposed Action.

[51] San Francisco Planning Department. *55 Laguna Mixed Use Project Draft Environmental Impact Report, Appendix A, Initial Study*, Planning Department Case No. 2004.0773E, State Clearing House No. 2005062084, January 27, 2007.

4.3.2.2 Preservation Alternative (1—No Impact Anticipated)

The Preservation Alternative would be located in the same location as the Proposed Action. There would be adequate and convenient access to retail services from the project site, and existing retail and commercial services would not be adversely affected or displaced by the alternative.

4.3.3 Health Care

4.3.3.1 Proposed Action (2—Potentially Beneficial)

Medical facilities near the project site include:

- California Pacific Medical Center (CPMC) Davies Campus, a full-service hospital with emergency services located 0.38 miles west of the project site;[52]
- Lyon-Martin Health Services, a health care center providing services to women and transgendered individuals located 0.15 miles northeast of the project site;[53] and
- Care Practice, an urgent and primary care clinic located 0.2 miles south of the project site.

Other hospitals, clinics, and doctor offices are located throughout the City of San Francisco and within a few miles of the project site.

A pharmacy is located at the CPMC Davies Campus, and there are two additional pharmacies closer to the project site at the intersection of Church Street and Duboce Street.

While recognizing that the current San Francisco Emergency Medical Services (EMS) System is not yet capable of meeting them, the EMS Agency has identified that the Emergency Medical Services Authority (EMDAC) recommended Response Time Intervals are a worthy goal, and will evaluate and improve the San Francisco EMS System by using the following Response Call Intervals, as recommended by EMDAC, as benchmarks:

- Basic Life Support with Automated External Defibrillator on scene – 5 minutes from time of first ring at primary public-safety answering point to vehicle arrival at the scene with the wheels stopped.
- Advanced Life Support – 10 minutes from time of first ring at primary public-safety answering point to vehicle arrival at the scene with the wheels stopped.
- Patient Transport Vehicle – 12 minutes from time of first ring at primary public-safety answering point to vehicle arrival at the scene with the wheels stopped.[54]

The medical needs of residents would be provided by nearby facilities, and ambulance trips to a hospital, health care center, or emergency room. The Proposed Action's site plan would provide adequate access for emergency vehicles. There would be no adverse effects to healthcare facilities

[52] California Pacific Medica Center (CPMC) Sutter Health, Rebuild CPMC: Davies Campus, website: http://rebuildcpmc.org/plans/davies_campus/, accessed April 2012.
[53] Lyon-Martin Health Services. web site: http://lyon-martin.org/, accessed April 2012.
[54] San Francisco Department of Emergency Management. *San Francisco EMS Agency Policy and Procedure Manual*, September 1, 2011.

or delivery as a result of the Proposed Action, and project site populations could be positively affected by proximity to services.[55]

4.3.3.2 Preservation Alternative (2—Potentially Beneficial)

The Preservation Alternative would occur in the same location as the Proposed Action. Therefore, residents would have access to the medical services, described above. The site plan would ensure adequate access for emergency vehicles, and there would be no adverse effects to healthcare facilities.

4.3.4 Social Services

4.3.4.1 Proposed Action (2—Potentially Beneficial)

The City and County of San Francisco has numerous social service providers. For example, the nearby UCSF Alliance Health Project supports mental health and wellness of LGBT and HIV-affected communities.[56]

Currently, Openhouse offers a wide range of programs and activities for LGBT seniors. These programs include exercise classes, men's and women's support groups, grief counseling, health workshops, housing assistance. Openhouse offices at the project site would provide social, educational, and health services to the LGBT senior community, including both residents of the Openhouse building and others not residing on-site.[57]

The project site would be served by existing social services in San Francisco and by the support services to be provided to tenants at the project site. The project would result in potentially beneficial effects.

4.3.4.2 Preservation Alternative (2—Potentially Beneficial)

The Preservation Alternative would include similar uses to the Proposed Action, but at a lower density. The alternative would result in similar potentially beneficial effects related to social services.

4.3.5 Solid Waste

4.3.5.1 Proposed Action (1—No Impact Anticipated)

Solid waste removal services are already available to the neighborhood. More than 80 percent of solid waste generated in San Francisco is transported to the Altamont Landfill in Alameda County. The Altamont Landfill has a permitted peak maximum daily disposal of 11,150 tons per day and accepted 1.06 million tons in 2009, down from 1.31 million tons in 2005. The landfill has

55 San Francisco Planning Department. *55 Laguna Mixed Use Project Draft Environmental Impact Report, Appendix A, Initial Study*, Planning Department Case No. 2004.0773E, State Clearing House No. 2005062084, January 27, 2007.
56 Alliance Health Project. website: UCSF-ahp.org, University of California San Francisco, accessed April 2012.
57 Openhouse. website: http://openhouse-sf.org/, accessed March 28, 2012

an estimated remaining capacity of approximately 46 million cubic yards or 74 percent of its permitted capacity. The estimated closure date of the landfill is 2029. The City intends to ship its solid waste to the Recology Ostrom Road Landfill in Yuba County when the current agreement with the Altamont Landfill expires.[58] The Ostrom Road Landfill has a permitted capacity of 3,000 tons of solid waste per day. The landfill has an expected closure date of 2066 with a total design capacity of more than 41 million cubic yards.[59]

The San Francisco Department of the Environment estimates that the city generated 2.15 million tons of waste in 2010, 60 percent of which was recycled and 20 percent of which was composted. The City's per resident disposal target rate is 6.6 pounds per person per day (PPD), and its per employee disposal target rate is 10.6 PPD. In 2010, which is the most recent date for which data are available, the measured disposal rate was 3.0 PPD for residents and 5.0 PPD for employees, thereby meeting the City's target rates.[60]

The project would not substantially increase the demand for solid waste removal service beyond what is already provided for in this area.[61] Given the existing and anticipated increase in solid waste recycling and the proposed landfill expansion in size and capacity, there would be no adverse effects on solid waste facilities.

4.3.5.2 Preservation Alternative (1—No Impact Anticipated)

The Preservation Alternative would result in similar land uses to the Proposed Action, but at an overall reduced density and intensity. Therefore, the alternative would generate less waste than the Proposed Action, and it there would be no adverse effects on solid waste facilities.

4.3.6 Waste Water

4.3.6.1 Proposed Action (1—No Impact Anticipated)

The SFPUC maintains and operates a combined sewer system that serves most of San Francisco. This system collects stormwater runoff and wastewater flows in the same network of pipes. It conveys flows to facilities where they are treated prior to discharge through outfalls into the Bay or Pacific Ocean. Discharges are regulated under National Pollutant Discharge Elimination System (NPDES) permits from the California Regional Water Quality Control Board, San Francisco Bay Region.

The collection system consists of about 976 miles of underground pipes throughout the city, which is divided into an eastern and western basin. The project site lies in the eastern basin, where average dry weather flows of 63 mgd are directed to the Southeast Water Pollution Control

58 San Francisco Department of the Environment, web site: http://sfenvironment.org/news/press-release/city-introduces-measure-to-approve-new-landfill-contract, accessed July 23, 2012.

59 CalRecycle, Facility / Site Summary Details: Recology Ostrom Road Landfill, available online: http://www1.calrecycle.ca.gov/SWFacilities/Directory/58-AA-0011/Detail/, accessed July 23, 2012.

60 CalRecycle, Jurisdiction Diversion / Disposal Rate Summary, available online: http://www.calrecycle.ca.gov/LGCentral/DataTools/Reports/DivDispRtSum.htm, accessed July 23, 2012.

61 San Francisco Planning Department. *55 Laguna Mixed Use Project Draft Environmental Impact Report, Appendix A, Initial Study*, Planning Department Case No. 2004.0773E, State Clearing House No. 2005062084, January 27, 2007.

Plant (SEWPCP) located on Phelps Street, south of Islais Creek on the eastern waterfront. Dry weather flows receive secondary treatment and are discharged into the Bay through the Pier 80 outfall, which has a capacity of 110 mgd.

During wet weather, up to 150 mgd of wet weather flows receive secondary treatment at the SEWPCP. The SEWPCP can also treat up to an additional 100 mgd to a primary treatment standard plus disinfection. Treated wet weather discharges of up to 250 mgd flow through the Pier 80 outfall or through the Quint Street outfall to Islais Creek. Only wastewater treated to a secondary level is discharged at the Quint Street outfall.

Up to an additional 100 mgd of wet weather flows receive primary treatment plus disinfection at the North Point Wet Weather Facility, located on the north side of the City at 111 Bay Street, which operates only during wet weather. Treated effluent from this facility is discharged through four deep water outfalls, approximately 800 feet from the Bay shore. Two of the deep water outfalls terminate at the end of Pier 33 and two terminate at the end of Pier 35 on the northeastern Bay shore.

As stated below, under "Water Supply," the residents of the Proposed Action would consume about 73,102 gpd, and additional water would be consumed for other uses at the project site. Assuming that this water demand translates into almost equal wastewater generation, this generation would not be a substantial within to the SEWPC's capacity of 110 mgd dry weather flow and 150 mgd wet weather flow.[62,63] Therefore, there would be no adverse effect relative to wastewater.

4.3.6.2 Preservation Alternative (1—No Impact Anticipated)

The Preservation Alternative would result in less wastewater generation than the Proposed Action, given that the alternative would result in 98 fewer residential units. Wastewater generation from the alternative would not be substantial within the SEWPC's 110-mgd dry weather flow and 150-mgd wet weather flow capacity. The impact would not be adverse.

4.3.7 Storm Water

4.3.7.1 Proposed Action (4—Requires Mitigation)

The site is a developed parcel already connected to the City's existing drainage system. As stated above, the SFPUC maintains and operates a combined sewer system. The project site lies in the eastern basin, where wet weather flows are directed to the Southeast Water Pollution Control Plant (SEWPCP) located on Phelps Street, south of Islais Creek on the eastern waterfront.[64]

62 San Francisco Public Utilities Commission (SFPUC). *Sewer System Improvement Program Report: Draft Report for SFPUC Commission Review*, prepared by Wastewater Enterprise Staff, August 10, 2010.

63 San Francisco Planning Department. *55 Laguna Mixed Use Project Draft Environmental Impact Report, Appendix A, Initial Study*, Planning Department Case No. 2004.0773E, State Clearing House No. 2005062084, January 27, 2007.

64 San Francisco Public Utilities Commission (SFPUC). *Sewer System Improvement Program Report: Draft Report for SFPUC Commission Review*, prepared by Wastewater Enterprise Staff, August 10, 2010.

The project site slopes steeply downward from northwest to southeast and is divided into two terraces. The existing site comprises primarily impervious surfaces. The majority of the existing buildings occupy the periphery of the site on the upper and lower terraces, with surface parking generally in the center of the site.

The Proposed Action would not substantially increase the amount of impervious surfaces, but instead could potentially improve drainage conditions on the site by creating additional landscaping and other pervious surfaces. Therefore, there would be no adverse effect with respect to storm water runoff.

The federal Clean Water Act effectively prohibits discharges of stormwater from construction projects unless the discharge is in compliance with a NPDES permit. Construction stormwater discharges to the City's combined sewer system would be subject to the requirements of Article 4.1 of the San Francisco Public Works Code (supplemented by Department of Public Works Order No. 158170), which incorporates and implements the City's NPDES permit, and federal policy with respect to the City's combined sewer system overflows. At a minimum, the City requires that a project sponsor develop and implement an erosion and sediment control plan to reduce the impact of runoff from a construction site. The plan must be reviewed and approved by the City prior to implementation, and the City conducts periodic inspections to ensure compliance with the plan. Any stormwater drainage during construction would flow to the City's combined sewer system, where it would receive treatment at the Southeast plant or other wet weather facilities and would be discharged through an existing outfall or overflow structure in compliance with the existing NPDES permit. Therefore, with compliance with applicable permits, water quality impacts related to violation of water quality standards or degradation of water quality due to discharge of construction related stormwater runoff would not be adverse. **Mitigation Measure 1.2.7**, **Construction Stormwater**, would ensure that the project adheres to the City's construction stormwater control requirements.

4.3.7.2 Preservation Alternative (4—Requires Mitigation)

The Preservation Alternative would not substantially increase the amount of impervious surfaces, but instead could potentially improve drainage conditions on the site by creating additional landscaping and other pervious surfaces.

The alternative would be required to construction dewatering and groundwater protection controls described above. **Mitigation Measure 1.2.7, Construction Stormwater,** would ensure that the project adheres to the City's construction stormwater control requirements. There would be no adverse effect.

4.3.8 Water Supply

4.3.8.1 Proposed Action (1—No Impact Anticipated)

According to the San Francisco Public Utilities Commission, retail water service demand comprises about 85.6 gallons per capita per day (gpcd). As stated above, under Demographic

Character Changes, the Proposed Action could result in up to 854 new residents of San Francisco. Therefore, daily water demand from the residents of buildings constructed under the Proposed Action would be about 73,102 gallons per day (gpd). Additional water would be consumed by secondary uses at the site, including Openhouse offices, the community center, the retail space, and site landscaping. According to SFPUC, this 73,102 gpd would represent 0.09 percent of system-wide retail demand in 2015. Therefore, the increased water demand of the Proposed Action would not substantially affect water supplies, and the effect would not be adverse.[65,66]

4.3.8.2 Preservation Alternative (1—No Impact Anticipated)

As stated above, under Demographic Character Changes, the Preservation Alternative could result in up to 644 new residents of San Francisco, or 210 fewer residents than the Proposed Action. As under the Proposed Action, there would be no adverse effects to water supply under the Preservation Alternative.

4.3.9 Public Safety

4.3.9.1 Proposed Action (1—No Impact Anticipated)

Police

The project site currently receives police protection from the San Francisco Police Department, and the Proposed Action would create additional demand for police services in the area. Mission Station is located at 630 Valencia Street, approximately 0.7 miles south of the project site, and serves a population of 91,087 people in a 2.7-square-mile area. In 2011, the Mission Station responded to 1,052 violent crime incidents and 4,415 property crime incidents.[67]

In addition to Mission Station, Northern Station is located at 1125 Fillmore Street, 1 mile north of the site, and Tenderloin Station is located at 301 Eddy Street, approximately 1.5 miles northeast of the site.

Although the project could increase the number of calls received from the area or the level of regulatory oversight that must be provided as a result of the increased concentration of activity on the site, the increase in responsibilities would not likely be substantial in light of the existing demand for police protection services in the area, and no adverse effect would ensue.[68]

Fire

The project site currently receives fire protection from the San Francisco Fire Department (SFFD), and the Proposed Action would create additional demand for fire protection services in

65 San Francisco Public Utilities Commission (SFPUC). *2010 Urban Water Management Plan*, pages 38 and 69, June 2011.
66 San Francisco Planning Department. *55 Laguna Mixed Use Project Draft Environmental Impact Report, Appendix A, Initial Study*, Planning Department Case No. 2004.0773E, State Clearing House No. 2005062084, January 27, 2007.
67 San Francisco Police Department web site: http://sf-police.org/index.aspx?page=862, accessed March 28, 2012.
68 San Francisco Planning Department. *55 Laguna Mixed Use Project Draft Environmental Impact Report, Appendix A, Initial Study*, Planning Department Case No. 2004.0773E, State Clearing House No. 2005062084, January 27, 2007.

the area. The nearest fire station, Station 36, is located at the intersection of Oak and Franklin Streets, approximately four blocks northeast of the project site. Other nearby stations are located at the intersection of Sanchez and Fifteenth Streets (Station 6) and at Turk and Webster (Station 5).[69]

The project would be required to comply with all appropriate regulations in the 2010 San Francisco Fire Code, which incorporates the California Fire Code and portions of the International Fire Code. The San Francisco fire code establishes requirements pertaining to fire protection systems, including the provision of State-mandated smoke alarms, fire extinguishers, appropriate building access, and emergency response notification systems.

The private roadway in the center of the site, combined with the proposed building layout facing adjacent streets, would ensure that the project site would be accessible to fire vehicles. Although the Proposed Action could increase the number of service calls received from the area, this increase would be incremental compared to existing conditions. Deputy Chief of Administration of the San Francisco Fire Department Guzman confirmed that the SFFR has sufficient resources to meet the increase in service call that may arise as a result of the development.[70,71] Therefore, there would be no adverse effect.

Emergency Medical

SFFD firefighters are also trained as emergency medical technicians (EMTs), and some firefighters are also paramedics. Emergency medical response and patient transport is provided by SFFD, which also coordinates with Advanced Life Support and Basic Life Support Ambulance Providers.[72]

The Proposed Action can be expected to increase the number of calls for services from the project site. However, the increases would be incremental and would not likely be substantial compared to the existing demand and capacity for emergency medical services in the City.[73] No adverse effect would ensue.

4.3.9.2 Preservation Alternative (1—No Impact Anticipated)

The Preservation Alternative would be located in the same location as the Proposed Action, but the alternative would generate overall fewer residents than the Proposed Action. The incremental increase in calls for police, fire, and emergency medical services would not result in an adverse effect.

69 San Francisco Fire Department. web site: http://www.sf-fire.org/index.aspx?page=176, accessed March 28, 2012.
70 San Francisco Planning Department. *55 Laguna Mixed Use Project Draft Environmental Impact Report, Appendix A, Initial Study*, Planning Department Case No. 2004.0773E, State Clearing House No. 2005062084, January 27, 2007.
71 Flannery, Eugene T., Personal Communication with Deputy Chief of Administration Guzman, San Francisco Fire Department, San Francisco Mayor's Office of Housing, July 6, 2012.
72 San Francisco Department of Emergency Management. *San Francisco EMS Agency Policy and Procedure Manual*, September 1, 2011.
73 San Francisco Planning Department. *55 Laguna Mixed Use Project Draft Environmental Impact Report, Appendix A, Initial Study*, Planning Department Case No. 2004.0773E, State Clearing House No. 2005062084, January 27, 2007.

4.3.10 Open Space and Recreation

4.3.10.1 Proposed Action (2—Potentially Beneficial)

Open Space

Buena Vista Park, Corona Heights Park, and Golden Gate Park are all located about 0.75 miles west of the project site. Other nearby large open spaces are the Mt. Sutro Open Space Reserve and The Presidio, located 1.7 miles to the southwest and northwest, respectively. The incremental increase of residents at the project site would not create a significant new demand for open space, and therefore there would be no adverse effect on open space.[74]

Recreation

In May 2009, the San Francisco Planning Department released the first Draft of the Recreation and Open Space Element (ROSE). A revised draft incorporating public and agency comments was released in June 2011. The project site and immediate surrounding areas to the east and west are not identified as high-needs areas in the draft ROSE. However, the Western Addition neighborhood to the north of the project site and the Mission neighborhood to the south of the project site are identified as Priority Renovation and Acquisition areas where there is a greater need for recreational facilities.[75]

Five parks and open spaces are located within one-quarter mile of the project site: Koshland Park, Duboce Park, Patricia's Green, Rose Page Mini-Park, and Octavia Plaza. Koshland Park is a local park that occupies a quarter of the block on the corner of Buchanan and Page Streets, about one block north of the project site. The more than 37,000-square-foot park includes a playground, communal garden space and seating areas. About three blocks west of the project site is Duboce Park—bounded by Duboce Avenue and Herman, Steiner and Scott Streets—a well trafficked park providing over 190,000 sq. ft. of open space containing a sloping grassy field and a recently renovated playground with a basketball court at its upper end. To the northeast of the project site is Patricia's Green, located between Hayes and Fell Streets within the center of the Octavia Boulevard right-of-way. Patricia's Green contains turf and hardscape areas with seating. Rose Page Mini-Park is between Rose and Page Streets and between Laguna and Octavia Streets, and is about the size of one residential lot.

The Proposed Action would include construction of new recreational space within the project site in Waller Park, community gardens, commons, and other outdoor areas. The project would also include the indoor senior activities center in the Openhouse building and a community center in Woods Hall Annex, which would result in a beneficial effect.

The project population would not have an associated significant demand on recreation facilities that could not be accommodated by existing facilities and facilities to be created as a part of the project. Therefore, the Proposed Action would not result in substantial physical deterioration of

74 *Ibid.*

75 San Francisco Planning Department. *General Plan*, available online: http://www.sf-planning.org/ftp/general_plan/index.htm, accessed March 26, 2012.

existing recreational resources. In addition, the small additional demand would not require the construction or expansion of offsite recreational facilities. As such, the Proposed Action would have a beneficial effect on recreational facilities.

Cultural Facilities

The project site is located within the City of San Francisco, which is the location of numerous cultural facilities. The project site is half a mile from the Civic Center neighborhood of San Francisco, which houses several performing arts buildings. The San Francisco Symphony, San Francisco Ballet, Asian Art Museum, the Main Library, Bill Graham Auditorium, and the Joseph L. Alioto Performing Arts Piazza are all located in this area. In addition, other cultural facilities are spread through the city and greater Bay Area. The residents of the proposed project would be well served by the numerous cultural facilities which are within either walking distance or accessible by public transportation. The Proposed Action would generate a very small amount of additional demand for these facilities. No adverse effects would result.

4.3.10.2 Preservation Alternative (2—Potentially Beneficial)

The Preservation Alternative would be located in the same location as the Proposed Action, and the same open space, recreational, and cultural facilities would be located nearby. The alternative would result in fewer new residents than the Proposed Action, and no adverse effects to these facilities would result.

4.3.11 Transportation

4.3.11.1 Proposed Action (1—No Impact Anticipated)

Trip Generation

Trips that would be generated by the Proposed Action were estimated using rates for residential units and general retail spaces from the San Francisco Planning Department's Transportation Impact Analysis Guidelines for Environmental Review, October 2002 (SF Guidelines), and rates for the community center from survey results produced for the Jewish Community Center Transportation Study.[76,77] Person-trip generation for residential uses includes work and non-work trips, and for non-residential space includes both employee and visitor trips. (Transportation calculations are presented in **Appendix C**.)

Overall, the Proposed Action would generate approximately 4,504 person-trips (inbound and outbound) on a weekday daily basis, and 612 person-trips during the weekday PM peak hour, which is similar to (5 to 6 percent lower than) the previous development proposal for the site

[76] San Francisco Planning Department. *Transportation Impact Analysis Guidelines for Environmental Review*, October 2002.

[77] San Francisco Planning Department. *Jewish Community Center Transportation Study: Final Report,* Case No. 1999.812!, prepared by Wilbur Smith Associates, August 15, 2000.

analyzed in the 2008 EIR.[78] About 40 percent of the person-trips would be by auto, 42 percent by transit, and 18 percent by walk/other modes. For purposes of comparison, the Proposed Action would generate about 191 vehicle trips during the weekday PM peak hour (about 7 percent fewer than the 206 vehicle trips that would be generated by the previous project).

Traffic Effects

As described in the 2008 EIR, the level of service (LOS) at all intersections in the project area was acceptable (LOS D or better) during the weekday p.m. peak hour, and would continue to operate at LOS D or better after the addition of project-generated vehicle trips (i.e., no adverse effects on traffic operating conditions).[79] Regarding cumulative traffic impacts, the 2008 55 Laguna Mixed Use Project EIR states that while operations at three intersections (Market/Octavia Street, Market/Church/14th Streets, and Market/Laguna/Hermann/Guerrero Streets) would worsen to an unacceptable LOS condition under 2025 Cumulative conditions, project trips would not materially affect overall LOS performance to those intersections, would not represent a considerable contribution to 2025 Cumulative conditions, and would not have a significant cumulative traffic impact. As described above, the current project would generate fewer vehicle trips than the project analyzed in the 2008 EIR. However, the current plan would alter the project's parking access and egress, which could change circulation patterns in the immediate site vicinity. In addition, there have been other traffic analyses conducted since the 2008 EIR was certified, and those analyses (2001 Market Street, and California Pacific Medical Center Long-Range Development Plan [CPMC LRDP]) were examined to determine if the findings of those analysis could constitute "new circumstances and environmental conditions which may affect the project or have a bearing on its impact" (24 CFR 58.47(a)(2)).

The 2001 Market Street Community Plan Exemption and Mitigated Negative Declaration (November 2010) provides support for continued reliance on the transportation analysis in the 2008 55 Laguna Mixed Use Project EIR, as LOS conditions at three intersections analyzed in both EIRs were similar (acceptable service levels).[80] This includes the critical intersection of Market/Laguna/Hermann/Guerrero Streets, adjacent to the southeast corner of the 55 Laguna site. However, the CPMC LRDP Draft EIR (July 2010) reported poor LOS F at the one intersection analyzed in all three EIRs (Market/Church/14th Streets).[81,82]

As stated above, the project's parking access and egress would differ from that proposed by the previous project, with two access driveways (on Laguna Street and Buchanan Street) instead of

78 The difference in project trip generation (the proposed project compared to the project analyzed in the 2008 EIR) is attributable to the smaller retail space proposed for the current project (about 2,410 square feet versus 5,000 square feet). The number and mix of types of proposed dwelling units also have changed from the 2008 EIR, as has the size of the community facility, but the main difference in trip generation potential between the two projects is the retail space.

79 San Francisco Planning Department. *55 Laguna Mixed Use Project Draft Environmental Impact Report*, Planning Department Case No. 2004.0773E, State Clearing House No. 2005062084, January 27, 2007.

80 San Francisco Planning Department. *2001 Market Street Mixed-Use Development Community Plan Exemption*, Case No. 2008.0550E, November 9, 2010.

81 San Francisco Planning Department. *California Pacific Medical Center (CPMC) Long Range Development Plan Comments and Responses*, Case No. 2005.0555E, State Clearinghouse No. 2006062157, April 26, 2012.

82 San Francisco Planning Department. *California Pacific Medical Center (CPMC) Long Range Development Plan Draft Environmental Impact Report*, Case No. 2005.0555E, State Clearinghouse No. 2006062157, July 21, 2010.

four (two on Laguna Street, and one each on Buchanan Street and Hermann Street). The effect of the change in parking access/egress on the project's traffic impacts would not be substantial given that the distribution of project trips would be greatest to and from areas north and east of the project site (i.e., through intersections operating at LOS C or better), and less so through intersections operating with more congestion (e.g., Market/Church/ 14th Streets).[83] Similarly, the Proposed Action's contribution to cumulative conditions at area intersections would be similar to the previous project and would not be significant. Therefore, the Proposed Action would not substantially affect vehicular service levels in the project area, and no adverse effect would ensue.

Parking Demand

Using parking demand rates from the SF Guidelines, the development implemented under the Proposed Action would have a parking demand for about 410 spaces (28 short-term, 382 long-term) during the midday peak period, and 503 spaces (28 short-term, 475 long-term) during the evening peak period. The proposed 310-vehicle parking capacity would not be able to accommodate either the midday or evening parking demand (an unmet midday demand of about 100 spaces, and an unmet evening demand of about 193 spaces). The project's unmet demand would increase the project area's parking occupancy during the weekday midday period, but this excess demand could be accommodated by on-street parking spaces. However, not all of the unmet evening demand would be accommodated in the immediate vicinity of this site, and some drivers would have to find parking elsewhere or resort to other travel mode alternatives. Accordingly, the project would not result in adverse effects with respect to parking.

Transit Effects

The Proposed Action would generate approximately 272 net-new transit trips during the weekday PM peak hour, similar to (somewhat lower than) the previous development proposal for the site analyzed in the 2008 EIR. Transit trips to and from the project were assigned to the nearby Muni bus lines, including the 6-Parnassus, 7-Haight, 71-Haight/Noriega, the Muni Metro lines (K-Ingleside, L-Taraval, M-Ocean View and N-Judah), and the F-Market and Wharves streetcar line. The addition of the project-generated trips would not substantially increase the peak-hour capacity utilization of transit lines within a quarter-mile radius of the project site. Therefore, the Proposed Action would not substantially affect the transit system in the project area, and no adverse effects would ensue.

Pedestrian Effects

Currently, sidewalks are provided along all four sides of the project site, and new sidewalks would be provided on the interior streets within the project site. Pedestrian trips generated by the Proposed Action would include walk trips to and from the project site, plus walk trips to and from parked vehicles and transit lines. Existing pedestrian volumes were observed to be relatively low, operating at free-flow conditions during the weekday PM peak period. New pedestrian trips generated by the project would be accommodated on the existing sidewalks and crosswalks

[83] Although the Central Freeway is on the south side of Market Street, access between the freeway and the project site would be via Octavia Boulevard, which is northeast of the site.

adjacent to the project and would not substantially affect current pedestrian conditions. Therefore, the Proposed Action would not adversely affect the pedestrian network in the project area.

Bicycle Effects

In the project vicinity, portions of eight streets (14th, 11th, Page, Octavia, Webster, McCoppin, Otis and Market Streets) are designated as Citywide Bicycle Routes. During field observations, high bicycle volumes were observed on Duboce Avenue and Market Street in the project vicinity. In general, during both the weekday midday and evening periods, bicycle conditions were observed to be operating acceptably, with few conflicts between bicyclists, pedestrians and vehicles.

About 125 secure, on-site bicycle parking spaces would be available throughout the site for use by residents, and additional sidewalk bicycle racks would be available for visitor bicycle parking. Although the Proposed Action would result in an increase in the number of vehicles on the surrounding streets, this increase would not be enough to substantially affect bicycle travel in the area. Accordingly, there would be no adverse effects on bicyclists.

4.3.11.2 Preservation Alternative (1—No Impact Anticipated)

As stated in **Section 2.4.3**, this alternative would result in up to 332 residential units (about 79 senior housing units and approximately 253 non-senior units). This alternative would provide 10,000 sq. ft. of community space and up to 5,000 sq. ft. of retail. The distribution of studio, one-bedroom, and two-bedroom units would in proportion to the distribution under the Proposed Action. Given that historic buildings on the site would be retained, the overall underground square footage available for vehicular and bicycle parking would be reduced.

Regarding trip generation, this alternative would result in fewer person-trips and vehicle-trips than the Proposed Action, given the substantial reduction in total residential units (440 under the Proposed Action versus 332 under the alternative). Although the alternative would have more retail space than the Proposed Action, the amount of community space would be less than the Proposed Action, and the additional trips generated by this retail space would be offset by the reduction in total units and community space.

Given the reduced trip generation compared to the Proposed Action, the level of service (LOS) at all intersections in the project area would continue to operate acceptable levels after the addition of generated vehicle trips under the Preservation Alternative, and the project trips would not represent a considerable contribution to 2025 Cumulative conditions at those intersections, and would not have a significant cumulative traffic impact. The Preservation Alternative's parking access and egress points would be on Buchanan Street, Hermann Street, and Laguna Street. The Laguna Street access driveway would create a four-way intersection at Waller Street, similar to four-way intersection under the project analyzed in the 2008 EIR. The alternative would not substantially affect vehicular service levels in the project area.

The Preservation Alternative would result in slightly increased midday parking demand for retail services, but evening parking demand (primarily generated by residential uses) would be reduced compared to the demand under the Proposed Action. Accordingly, the alternative would not result in adverse effects with respect to parking.

Regarding transit, the alternative's reduced number of residential units would result in fewer peak-hour transit trips than the Proposed Action. These trips would not substantially affect the transit system in the project area, and no adverse effects would ensue.

The alternative would generate new pedestrian and bicycle trips, which would be accommodated on the existing sidewalk and bicycle lane network. On-site bicycle parking spaces would be available throughout the site for use by residents, and additional sidewalk bicycle racks would be available for visitor bicycle parking, although total bicycle parking spaces would be less than provided under the Proposed Action due to the overall reduction in unit density. There would be no adverse effects on bicyclists.

4.4 Natural Features

4.4.1 Water Resources

4.4.1.1 Proposed Action (1—No Impact Anticipated)

According to the San Francisco Public Utilities Commission, retail water service demand comprises about 85.6 gallons per capita per day (gpcd). As stated above, under Demographic Character Changes, the Proposed Action could result in up to 854 new residents of San Francisco. Therefore, daily water demand from the development implemented by the Proposed Action would be about 73,102 gallons per day (gpd). According to SFPUC, this 73,102 gpd would represent 0.09 percent of system-wide retail demand in 2015. The increased water demand of the Proposed Action would not substantially affect water supplies, and no adverse effect would ensue.[84,85]

The project site is currently almost completely covered with buildings, paving, and other impervious surfaces.

The Proposed Action would include excavation to depths ranging between 12 to 25 feet. A geotechnical report conducted for the site indicated the presence of groundwater at depths between 18 and 22 feet below the ground surface and a Phase I Environmental Site Assessment conducted for the site reported that one boring encountered groundwater at a depth of approximately 12 feet below ground surface.[86] Groundwater is not used as a water supply in the

84 San Francisco Public Utilities Commission (SFPUC). *2010 Urban Water Management Plan*, pages 38 and 69, June 2011.

85 San Francisco Planning Department. *55 Laguna Mixed Use Project Draft Environmental Impact Report, Appendix A, Initial Study*, Planning Department Case No. 2004.0773E, State Clearing House No. 2005062084, January 27, 2007.

86 Treadwell & Rollo, Inc. *Phase I and Limited Phase II Environmental Site Assessment, 55 Laguna Street, San Francisco, California*, September 10, 2004.

eastern portion of San Francisco, inclusive of the project site. Therefore, the Proposed Action would result in no adverse effect on water resources.[87]

4.4.1.2 Preservation Alternative (1—No Impact Anticipated)

As described above, the 332 units that would be constructed under the Preservation Alternative would result in 644 residents, which is 210 fewer (24.5 percent fewer) new residents than would be generated by the Proposed Action. Water demand would be proportionally less substantial under the Preservation Alternative, and the increased demand would not affect water supplies.

Regarding groundwater, the Preservation Alternative would be located in the same location as the Proposed Action. Groundwater is not used as a water supply in the eastern portion of San Francisco, inclusive of this site. The alternative would not result in an adverse effect on water resources.

4.4.2 Surface Water

4.4.2.1 Proposed Action (1—No Impact Anticipated)

The project site is located more than 2 miles from the San Francisco Bay shoreline and more than 1 mile from the Mission Creek canal, the nearest surface body of water connecting to the bay. There is no surface body of water on the project site. Therefore, the proposed action would not result in direct runoff into a surface water body.

Runoff from the project site currently flows to the San Francisco combined sewer system. The project site already primarily comprises impervious surfaces (parking lots, walkways, and building roofs). During rain events, these surfaces generate stormwater flows to the combined system. The proposed action's mix of buildings, gardens, and public and private open spaces—as shown in the Site Plan in **Figure 2**—would not result in a substantial increase in the amount of impervious surfaces at the project site. Therefore, the action would not result in substantial new stormwater flows beyond existing conditions. Moreover, the existing surface parking lots that generate stormwater flows may contain hydrocarbons from associated vehicles. The proposed site plan (shown in **Figure 2**) would eliminate surface parking lots from the project site, thereby potentially reducing associated polluted runoff. There would be no adverse effect.

4.4.2.2 Preservation Alternative (1—No Impact Anticipated)

The Preservation Alternative would occur in the same location as the Proposed Action. There would be no adverse effect on surface waters.

87 San Francisco Public Utilities Commission (SFPUC). "Groundwater," web page: http://sfwater.org/index.aspx?page=184, accessed March 26, 2012.

4.4.3 Unique Natural Features and Agricultural Lands

4.4.3.1 Proposed Action (1—No Impact Anticipated)

HUD defines "unique natural features" as "primarily geological features which are unique in the sense that their occurrence is infrequent or they are of special social/cultural, economic, education, aesthetic or scientific value. … Examples of unique natural features include" sand dunes, waterfalls, unique rock outcroppings, caves especially with limestone or gypsum deposits, canyons, petrified forests."[88] The project site is located in an urban area, and the site itself is almost completely covered with buildings, paving, and other impervious surfaces.

The project site is designated as urban land by the United States Department of Agriculture Natural Resources Conservation Services.[89]

Therefore, the Proposed Action would not adversely affect agricultural lands or unique natural features. Effects on trees at the project site are discussed under Vegetation and Wildlife, below.

4.4.3.2 Preservation Alternative (1—No Impact Anticipated)

The Preservation Alternative would occur in the same location as the Proposed Action. There would be no adverse effect on agricultural lands or unique natural features.

4.4.4 Vegetation and Wildlife

4.4.4.1 Proposed Action (4—Requires Mitigation)

The project site is in a built out urban area and contains no rare or endangered plant or animal communities or habitat.[90] Therefore, the project activity would not affect any natural habitats containing endangered species, or any designated or proposed critical habitat.

Vegetation

Existing decorative landscaping would be removed and replaced with new landscaping as part of the project. Regarding trees, the City of San Francisco's Urban Forestry Ordinance, Public Works Code Article 16, Sections 801 et seq., was amended in 2007 to require a permit from the Department of Public Works to remove trees protected under the ordinance, including landmark trees, significant trees, and street trees. A permit is also required for removal of hazardous trees.

88 US Department of Housing and Urban Development, *Environmental Review Guide for Community Development Block Grant Programs*, https://hudnsphelp.info/media/resources/EnvironmentalReviewGuide.pdf.

89 United States National Resources Conservation Service. Web Soil Survey, website: http://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx, United States Department of Agriculture, accessed March 2012.

90 Environmental Science Associates (ESA). "Memorandum: 55 Laguna Project: Updated Biological Resources Assessment," March 28, 2012.

Landmark trees are trees that have been recommended for landmark status by the Urban Forestry Council. Such trees are then designated a landmark tree by ordinance approved by the Board of Supervisors.

Significant trees are trees located within 10 feet of any public right of way that also meet one or more of the following criteria:

1. the tree's diameter at breast height is greater than 12 inches;
2. the tree's canopy width is greater than 15 feet;
3. the tree is taller than 20 feet in height.

The project site contains a total of 141 trees, inclusive of 106 on-site trees and 35 street trees. There are no designated landmark trees on the project site, but five on-site trees may meet one or more criterion for landmark status.

One of the potential landmark trees is the "Sacred Palm"—which is a large Canary Palm behind Woods Hall that UC Extension students considered a symbol of the student community.

There are 31 significant trees on the project site. An additional seven trees on the project site could be considered potential hazard trees.

Of the 35 street trees adjacent to the project site, 12 are considered potential hazard trees, primarily due to sidewalk uplift.

Most, if not all, of these trees would be removed as part of the project. A tree removal permit from the Department of Public Works would be required prior to their removal. In accordance with the permit, the project sponsor would replace all significant trees removed from the site with new trees. The "Sacred Palm" would be removed during construction and then replanted on the project site. **Mitigation Measure 1.2.2, Biological Resources**, would ensure that the tree is replanted on the site.

Implementation of the requirements of the tree removal permit(s), as well as installation of replacement trees and landscaping, would ensure that there would be no adverse effect to onsite vegetation.

The project would continue the urbanized character of the project site, with controlled landscaped plant communities. It would not introduce invasive species or conditions for invasive species to flourish. It would not affect the survival of existing nearby vegetation off-site. There would be no adverse effect to off-site vegetation.

Breeding Birds

Twenty species of birds have been observed at the project site. However, no nests were documented during the original or updated biological assessment of the site. Regardless, birds are expected to nest in vegetation and on buildings in and around the project site. Disturbance or destruction of nesting special-status bird habitat during the breeding season (February 1st through

July 31st) could potentially result in an adverse effect to biological resources. Removal or destruction of active nests and any killing of migratory birds would violate the federal Migratory Bird Treaty Act (16 USC, Section 703, 1989) and/or the California Fish and Game Code, Sections 3500-3516. Implementation of **Mitigation Measure 1.2.2, Biological Resources**, would ensure the protection of nesting birds due to tree removal.

Bird-Safe Building Standards

The San Francisco Planning Department adopted Standards for Bird-Safe Buildings in 2011. Additionally, the San Francisco Board of Supervisors approved, and the mayor subsequently signed, legislation amending the *San Francisco Planning Code* to incorporate bird-safe building standards into the Code.[91] The Standards for Bird-Safe Buildings include guidelines for use and types of glass and façade treatments, wind generators and grates, and lighting treatments. The standards impose requirements for both location-related hazards (in and near Urban Bird Refuges) and feature-related hazards, which are the same hazards identified in *Planning Code* Section 139.[92]

Regarding location-related hazards, the project site is not located within, or adjacent to, an Urban Bird Refuge. Therefore, new buildings and renovations to existing buildings at the project site would not be considered a location-related hazard and the standards for this type of hazard would not apply.

Regarding building feature-related hazards, current building plans are not specific enough to determine whether or not they include building feature-related hazards (such as transparent building corners). These types of building features would be avoided as building design is completed. If they are used then they would require treatments similar to those listed above to minimize potential impacts on birds.

Bats

The vacant buildings at the project site have tile roofs with spaces underneath the tiles that could provide roosting spots for bats. Additionally, there are numerous broken windows in the buildings, which could provide access to the interior for bats. Special-status bats are not expected to use potential habitat at the project site. It is possible that Mexican free-tailed bats might use the vacant buildings at the project site. However, this species is common and has no special status.

With the mitigation measure identified above, no adverse impact on biological resource impacts as a result of the Proposed Action would occur.[93,94,95]

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91 San Francisco Planning Department, *Standards for Bird-Safe Buildings*, Adopted July 14, 2011. Available on the internet at: http://www.sf-planning.org/ftp/files/publications_reports/bird_safe_bldgs/Standards_for_Bird-Safe_Buildings_8-11-11.pdf. Reviewed August 18, 2011.

92 San Francisco Board of Supervisors, Ordinance No. 199-11, http://www.sfbos.org/ftp/uploadedfiles/bdsupvrs/ordinances11/o0199-11.pdf, approved September 27, 2011 (Board File No. 110785), and signed by the Mayor on October 7, 2011.

93 Environmental Science Associates (ESA). "Memorandum: 55 Laguna Project: Updated Biological Resources Assessment," March 28, 2012.

94 San Francisco Planning Department. *55 Laguna Mixed Use Project Draft Environmental Impact Report*, Planning Department Case No. 2004.0773E, State Clearing House No. 2005062084, January 27, 2007.

95 San Francisco Planning Department. *55 Laguna Mixed Use Project Draft Environmental Impact Report, Appendix A, Initial Study*, Planning Department Case No. 2004.0773E, State Clearing House No. 2005062084, January 27, 2007.

4.4.4.2 Preservation Alternative (4—Requires Mitigation)

The Preservation Alternative would occur in the same location as the Proposed Action. Project activity would not affect any natural habitats containing endangered species, or any designated or proposed critical habitat.

Most trees would be removed as part of the Preservation Alternative. A tree removal permit from the Department of Public Works would be required prior to their removal. The "Sacred Palm" would be removed during construction and then replanted.

Regarding birds and bats, the Alternative would adhere to the San Francisco Bird-Safe Building Standards, as well as the mitigation measure identified above, and no adverse impact on biological resource effects as a result of the alternative would occur. **Mitigation Measure 1.2.2, Biological Resources**, would ensure the protection of trees and breeding birds.

4.5 Other Factors

Pursuant to HUD guidance, other factors, below, are not assigned impact codes as a determination of impact.

4.5.1 Flood Disaster Protection Act

[§58.6(a)]

4.5.1.1 Proposed Action

The project site is not within a 100-year floodplain or 500-year floodplain. The Federal Emergency Management Agency has stated that no flood hazard areas exist within the City and County of San Francisco. Flood insurance compliancy does not apply.

4.5.1.2 Preservation Alternative

The Preservation Alternative is located in the same location as the project site. It is outside all 100-year and 500-year floodplains.[96]

[96] United States Federal Emergency Management Agency (FEMA). Mapping Information Platform, web site: https://hazards.fema.gov/wps/portal/mapviewer, Flood Insurance Rate Map (FIRM), FIRM Mapping, U.S. Department of Homeland Security, accessed March 17, 2012.

4.5.2 Coastal Barrier Resources Act / Coastal Barrier Improvement Act

[§58.6(c)]

4.5.2.1 Proposed Action

The Coastal Barrier Resources Act of the United States (CBRA, Public Law 97-348), enacted October 18, 1982, designated various undeveloped coastal barriers, depicted by a set of maps adopted by law, for inclusion in the John H. Chafee Coastal Barrier Resources System (CBRS). Designated areas were made ineligible for direct or indirect federal national security, navigability, and energy exploration. CBRS areas extend along the coasts of the Atlantic Ocean and the Gulf of Mexico, Puerto Rico, the U.S. Virgin Islands, and the Great Lakes, and consist of 857 units. There are no Coastal Barrier Resources in California.[97]

4.5.2.2 Preservation Alternative

The Preservation Alternative is located in the same location as the project site. It is outside all defined CBRS areas.

4.5.3 Airport Runway Clear Zone or Clear Zone Disclosure

[§58.6(d)]

4.5.3.1 Proposed Action

San Francisco International Airport (SFO) is about 10 miles south of the project site. The project site is well outside the boundaries of the San Francisco Airport runway protection zones as depicted on the "existing conditions" and "future airport layout" drawings contained in SFO's Airport Layout Plan (ALP). The project site is outside all other defined safety zones, airspace protection zones, and Airport Influence Areas of the airport's Comprehensive Land Use Plan (CLUP) and CLUP update.

As shown in **Appendix B**, Oakland International Airport (OAK) is about 10 miles east of the project site. The project site is outside all defined safety zones, airspace protection zones, and other Oakland Airport planning zones.

There are no military airfields in San Francisco County or the nearby vicinity.

Therefore, no military airfield APZ or Clear Zone would affect the Proposed Action.

97 United States Fish & Wildlife Service. *Coastal Barrier Resource System.* available Online: http://www.fws.gov/CBRA/Act/index.html#CBRS, accessed March 26, 2012.

4.5.3.2 Preservation Alternative

The Preservation Alternative is located in the same location as the project site. It is outside all defined safety zones, airspace protection zones, and other planning zones of both the San Francisco and Oakland International Airport.

CHAPTER 5.0
Cumulative Effects

5.1 Introduction

An analysis of cumulative effects in the Draft Environmental Assessment (Draft EA) were not explicitly discussed. This section clarifies the cumulative analysis. No new analysis or technical reports were prepared in preparation of this summary, and the conclusions are unchanged: the project would not result in cumulative adverse effects.

The cumulative effects analysis referenced the cumulative effects analysis included in the 2008 Environmental Impact Report (EIR) and associated Initial Study for the previously proposed project at the site. The analysis considered the existing built-out nature of the project site and the site's location within an urban area with existing public service and utility infrastructure and without protected natural resources. Cumulative effects were determined not to be adverse.

Cumulative effects are defined as the effects "…on the environment which result from the incremental effect of the action when added to other past, present, and reasonably foreseeable future actions. Cumulative effects can result from individually minor but collectively significant actions taking place over a period of time" (40 CFR § 1508.7). The purpose of cumulative effects analysis, as stated by the Council on Environmental Quality (CEQ), "is to ensure that federal decisions consider the full range of consequences" (1997).

The cumulative analysis begins with defining the geographic boundary and time frame of the analysis. Secondly, the cumulative environment is described in the context of past, present and future actions that may affect the status of the resources, ecosystems, and human communities within the defined time frame and geographic boundary.

The analyses below conclude that the Proposed Action would not combine with past, present, and reasonably foreseeable future development to result in adverse cumulative effects.

5.1.1 Time Frame

The time frame of the cumulative effects analysis extends to 2025. This year was selected as the future analysis year because the San Francisco County Transportation Authority travel demand model used in background traffic analyses that were studied for the Environmental Assessment—including the traffic analysis presented in the 2008 EIR—forecasted for cumulative development and growth through 2025. Moreover, by 2025, the project would have been built out for a period of almost 10 years, and it would be expected to be tenanted and fully operational.

5.1.2 Geographic Boundary

The geographic area for the cumulative analysis varies depending upon the environmental issue and the geographic extent of the potential effect. For example, the geographic area associated with construction noise effects would be limited to areas close to the construction activity and directly affected by construction noise, whereas the geographic area that could be affected by energy demand would be the energy generation, transmission, and distribution grid of the entire Northern California energy market.

In most cases, the geographic extent of the project's contribution to cumulative effects would be limited to a small area around the 55 Laguna project site, including the adjacent streets and properties on blocks facing the site. For each section below, the geographic extent of the cumulative analysis is briefly described.

5.1.3 Cumulative Projects

The scope of past, present and future projects included in the cumulative analysis was determined by consultation of the San Francisco Planning Department's Pipeline Report (most recently updated in September 2012), as well as Association of Bay Area Government growth projections. The Pipeline report includes development projects that would add residential or commercial space, applications for which have been formally submitted to the Planning Department or the Department of Building Inspection. The report indicates that the Market-Octavia area has 2,530 net residential units in the pipeline, as well as a net loss of 418,440 square feet of commercial space.[1] Other neighborhoods nearby are also projected to increase total residential unit count, although to a lesser extent than the Market-Octavia area.

5.2 Cumulative Analysis

The following cumulative analysis determines whether the Proposed Action—when considered with past, present and future projects—could result in cumulatively significant and adverse effects. As described in the Draft EA, the Preservation Alternative would result in reduced intensity of development as compared to the Proposed Action. Therefore, contribution of the Preservation Alternative to cumulative effects would be less than under the Proposed Action, and the Preservation Alternative is only discussed in the Historic Properties cumulative analysis.

The analysis considers the contribution of the Proposed Action to cumulative effects, the feasible mitigation measures that would be implemented to reduce or avoid the contribution to a less than considerable level, and the overall character of the cumulative effect—adverse, beneficial, or otherwise. Effects are presented in the order that they appear in the Draft EA.

[1] San Francisco Planning Department, *San Francisco Pipeline Report: Quarter 2, 2012,* September 2012.

5.2.1 Statutory Checklist

5.2.1.1 Historic Preservation

The geographic boundary for cultural and historic resources is based on the Area of Potential Effects (APE), as delineated in preparation of the Environmental Assessment. As stated in the Draft EA, the APE means the geographic area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties, if any such properties exist. The APE is influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by the undertaking.

Proposed Action

Excavation, demolition and construction activities have the potential to damage or destroy unidentified archaeological resources. As described in the Draft EA, the Northwest Information Center (NWIC) did not identify any recorded archaeological resources in or near the project site. NWIC recommended halting construction in the event that cultural materials are discovered until the find can be evaluated by a qualified archaeologist, and that the Archaeological Research Design and Treatment Plan (ARDTP) prepared for a previous development proposal at this project site, be implemented. Adhering to these recommendations as required under the previous EIR, cumulative effects to archaeological resources would not be adverse.

Regarding historic architectural resources, as described in the Draft EA, the Proposed Action would introduce a significant new feature to the neighborhood, but it would not result in an adverse effect to the National Register-eligible Hayes Valley Residential Historic District, or any other individual National Register-listed or eligible properties within the secondary APE. The construction of the new residential buildings at the center of the former UC Berkeley Laguna Extension campus would be generally compatible with most of the surrounding properties in terms of scale, proportion, and massing. There are no proposed cumulative projects that would adversely affect any individual or contributory properties in the secondary APE.

Moreover, the 2007 Programmatic Agreement (PA) between the City and County of San Francisco, the California State Historic Preservation Officer, and the Advisory Council on Historic Preservation regarding HUD Part 58 Programs applies to past, present and future projects receiving funding from HUD within San Francisco. The City and County of San Francisco would continue to comply with the stipulations of the 2007 PA, which would reduce cumulative effects to historic properties.

Although the Proposed Action would adversely affect the historic properties at the project level, requiring the mitigation measure, it would not result in cumulative effects to the surrounding neighborhood. Implementation of **Mitigation Measure 1.2.1**, **Memorandum of Agreement**, would ensure that the Proposed Action would be consistent with the 2007 PA. Cumulative effects would not be adverse.

Preservation Alternative

As described in the Draft EA, this alternative would generally avoid the adverse effects to historic properties because it would retain Middle Hall and the Richardson Hall Administration Wing. Effects on historic architectural properties would be less than under the Proposed Action, and the cumulative effect would not be adverse.

5.2.1.2 Air Quality

Due to the diffuse nature of pollutant emissions, air quality effects are analyzed at a regional level. The maximum daily operational thresholds analyzed in the Draft EA represent the levels at which a project's individual emissions would result in a cumulatively considerable contribution to the regional air basin's air quality conditions. As described in the Draft EA, all project-related operational emissions of non-attainment pollutants and carbon monoxide would be substantially less than their respective *de minimis* threshold (16 percent or lower than these thresholds) and consequently would conform to the California State Implementation Plan implemented pursuant to the federal Clean Air Act. There would be no adverse cumulative effect on air quality.

Regarding construction, the City's Dust Control Ordinance and associated best management practices (BMPs) would be applicable to the Proposed Action, as well as to cumulative projects within the project site vicinity. These types of BMPs have been required for many years. Thus, many past projects as well as all present and reasonably foreseeable future projects have or would be required to implement BMPs for fugitive dust emissions from construction. Compliance with established dust control measures would ensure that cumulative effects from construction dust emissions would not be adverse.

5.2.1.3 Environmental Justice

The geographic extent of cumulative environmental justice effects is the surrounding neighborhood, in which communities of similar demographic profiles may congregate. As described in the Draft EA, the Proposed Action would improve the quality of life of the low-income and minority populations and would have beneficial long-term economical effects on these populations. Although the Proposed Action would result in minor construction-related adverse effects on the residents in nearby Census Tracts, given the mixed racial and socioeconomic profile of the neighborhood, the Proposed Action and other past, present, and reasonably foreseeable future development would not disproportionately affect minority residents living there. Cumulative environmental justice effects would not be adverse.

5.2.1.4 Other HUD Statutory Checklist Requirements

The project site is located in a built-out urban area more than one mile from the San Francisco Bay and 80 feet above sea level. The site is not within or adjacent to the 100- or 500-year floodplain, wetlands, or coastal zone. It is not served by a sole source aquifer and is not located adjacent or within a wild or scenic river or farmland. No federally listed endangered species or critical habitats are document within the project site or vicinity. Therefore, the Proposed Action would not combine with cumulative development to result in adverse cumulative effects to these resources.

5.2.2 HUD Environmental Standards

5.2.2.1 Noise

The geographic extent of cumulative noise analysis includes the nearby streets and uses that could generate noise that would affect, or be affected by, the project site. U.S. Department of Housing and Urban Development (HUD) regulations require an assessment of the future noise environment at least 10 years beyond the date of the project. To provide a conservative projection, the noise assessment presented in the Draft EA assumed a 1 percent annual growth in traffic volumes, plus project increment trip distribution, on streets surrounding the project site, to 2026. Therefore, the noise analysis met the 10-year requirement and considered cumulative effects of nearby development. The projection of the future noise level in 2026 would be a 2 dBA increase over the existing monitored value of 66 dBA, or 68 dBA. As described in **Mitigation Measure 1.2.4**, **Noise Reduction,** Title 24 of the California Code of Regulations establishes uniform noise insulation standards for residential projects. Residences of the Proposed Action—as well as residences of cumulative present and future development—must be designed to limit intruding noise to an interior CNEL (or DNL) of at least 45 dB. Additionally, these regulations have been in place for many years and have applied to past projects. Therefore, the cumulative noise effects would not be adverse.

5.2.2.2 Toxics / Hazardous / Radioactive Materials, Contamination, Chemicals or Gases

The geographic extent of cumulative hazardous materials effects includes adjacent or nearby project sites or operations where such materials may be handled. The project sponsor would follow the recommendations of the 2004 Phase I and Limited Phase II environmental site assessment prepared for the project site. A soil management plan (SMP) and a Health and Safety Plan (HSP) would be required prior to construction for use during site excavation to reduce worker and public exposure to hazardous chemicals. These requirements have been incorporated into **Mitigation Measure 1.2.3, Soil Management Plan and Health and Safety Plan**.

Moreover, pursuant to **Mitigation Measure 1.2.5, Asbestos & Lead-Based Paint Abatement,** the project sponsor would conduct an asbestos survey and would comply with Section 19827.5 of the California Health and Safety Code, adopted January 1, 1991, which requires that local agencies not issue demolition or alteration permits until an applicant has demonstrated compliance with notification requirements under applicable federal regulations regarding hazardous air pollutants, including asbestos. Also, San Francisco Building Code Section 3425, Work Practices for Lead-Based Paint on Pre-1979 Buildings and Steel Structures, would apply to project construction activities. The project sponsor would be required to conduct a lead-based paint survey and follow applicable safety regulations during renovation or demolition.

Past, present, and reasonably foreseeable future development would be subject to a range of federal, state, and local statutes and regulations, designed to protect health and safety, and enforced by state and local agencies, potential cumulative impacts resulting from the use, storage, transport, and disposal of hazardous materials would be prevented to the maximum extent

practicable and would not be significant. At the state level, the Department of Toxic Substances Control administers laws and regulations related to hazardous waste and hazardous substances pursuant to Division 20, Chapters 6.5 and 6.8 of the California Health and Safety Code and Title 22 of the California Code of Regulations, which are the state equivalents of Resource Conservation and Recovery Act and Comprehensive Environmental Response, Compensation, and Liability Act, respectively. The Regional Water Quality Control Board (RWQCB) enforces laws and regulations governing releases of hazardous substances and petroleum pursuant to Division 20, Chapters 6.7, 6.75, and 6.8 of the California Health and Safety Code, and the Porter Cologne Water Quality Control Act (Division 7, Section 13100 et seq. of the California Water Code) and Title 23 of the California Code of Regulations. The RWQCB focuses on petroleum releases and those hazardous substances that may impact groundwater or surface water. At the local level, the San Francisco Department of Public Health (SFDPH) administers the California Accidental Release Prevention ("CalARP") Program under Chapters 6.11 and 6.95 of the Health and Safety Code and San Francisco Health Code Article 21A, which is intended to prevent the catastrophic release of hazardous substances that could cause immediate harm to the public and environment, and which applies to any business in possession of more than a threshold quantity of regulated hazardous materials.

All present and reasonably foreseeable future projects would be required to comply with these regulations as applicable. Additionally, these regulations have been in place for many years and have applied to past projects. The cumulative effect would not be adverse.

5.2.2.3 Siting of HUD-Assisted Projects near Hazardous Operations

HUD regulations require that federally assisted projects be located at an Acceptable Separation Distance (ASD) from hazardous operations. As discussed in the Draft EA, the Proposed Action would occur at a site that is outside the ASD for nearby tanks. Cumulative development projects assisted by HUD would also be required to be located outside applicable ASDs. Therefore, cumulative effects of siting of HUD-assisted projects near hazardous operations would not be adverse.

5.2.2.4 Airport & Accident Potential Zones

The project site is 10 miles north and west of the San Francisco and Oakland International Airports, respectively, and well outside runway protection zones and other clear zones. There would be no adverse cumulative effects related to these zones.

5.2.3 HUD Environmental Checklist

5.2.3.1 Conformance with Comprehensive Plans and Zoning

The cumulative effects analysis includes the surrounding neighborhood where land use and policy controls would be affected by the project or cumulative development. As indicated in the Draft EA, due to the size, location, and nature of the Proposed Action, there would be no anticipated conflicts with regional plans. Regarding local plans and policies, the San Francisco Planning

Commission determined that the Proposed Action is consistent with the Objectives and Policies of the San Francisco General Plan, including the Market & Octavia Area Plan. Regarding local zoning approvals, the San Francisco Planning Commission approved a Conditional Use authorization for the current Proposed Action on August 16, 2012. Therefore the Proposed Action, when combined with cumulative development, would not result in cumulative effects related to non-conformance with comprehensive plans and zoning.

5.2.3.2 Compatibility and Urban Impact

The geographic extent of cumulative compatibility effects is the surrounding neighborhood that would be affected by land use changes. The conversion of the project site from institutional uses to multi-family residential—including housing for seniors, convenience retail, and community facility uses—would be compatible with the multi- and single-family residential, convenience retail, community, institutional and mixed uses in the project area. It would also be consistent with the cumulative trend toward increased residential development indicated in the San Francisco Planning Department's Pipeline report, described in Section 5.1.3. There would be no adverse cumulative effects.

5.2.3.3 Slope, Erosion, Soil Suitability, and Site Safety

The geographic extent of cumulative geologic and seismic effects includes adjacent and nearby parcels that could be affected by a ground or structural failure at the project site or adversely affect the project site. As indicated in the Draft EA, the Proposed Action would be required to implement **Mitigation Measure 1.2.6, Geotechnical Investigation,** which is repeated here:

> A site-specific, design-level geotechnical investigation for the project shall be conducted. The investigation and final recommendations shall be reviewed and approval by the Department of Building Inspection (DBI), and monitored by a DBI Special Inspector (if required) in conformance with all applicable city ordinances and policies of the California Building Code and the *San Francisco Building Code*. The geotechnical report shall be prepared by a registered geotechnical engineer and approved by DBI, and all recommendations shall be included in the final design of the project.

These requirements would ensure that the Proposed Action would not result in adverse geologic- or seismic-related effects. Present and reasonably foreseeable future developments would be required to undertake appropriate design and geotechnical investigations to the extent required by DBI in the building permit application process. Additionally, these requirements have been in place for many years and have applied to past projects. Cumulative effects would not be adverse.

5.2.3.4 Energy Consumption

The geographic boundary of the cumulative energy analysis is the entire PG&E service area. The project site is served by existing utilities that are already installed, and it would not require a major expansion of power facilities. As described in the Draft EA, the multi-family residential buildings would consume less energy than the same number of units constructed in detached housing. Moreover, the project sponsors are seeking Leadership in Energy and Environmental

Design-Neighborhood Design (LEED-ND) certification, which would reduce energy demand compared to traditional developments through building materials and fixtures selection, environmental systems design, and construction efficiency measures. Therefore, the Proposed Action—in combination with past, present, and reasonably foreseeable future development—would not result in cumulative adverse effects to energy.

5.2.3.5 Noise—Contribution to Community Noise Levels

As discussed above in Section 5.2.2.1, the geographic extent of cumulative noise analysis includes the nearby streets and uses that could generate noise that would affect, or be affected by, the project site. As discussed above, the Proposed Action and cumulative development would not result in adverse cumulative noise effects. HVAC units and other building equipment would be subject to San Francisco Noise Ordinance, Article 29, Section 2909, which limits noise from building operations. Present and reasonably foreseeable future development would also be subject to the Noise Ordinance. Additionally, these regulations have been in place for many years and have applied to past projects. Cumulative operational noise effects would not be adverse.

Regarding construction noise, pursuant to **Mitigation Measure 1.2.4, Noise Reduction,** construction activities of the Proposed Action would comply with San Francisco Noise Ordinance (Article 29 of the Police Code). Although the Proposed Action's construction schedule may overlap the construction schedule of cumulative projects in the vicinity, the cumulative projects would also be required to comply with the San Francisco Noise Ordinance. Cumulative construction noise effects would not be adverse.

5.2.3.6 Air Quality—Effects of Ambient Air Quality on Project and Contribution to Community Pollution Levels

Due to the diffuse nature of pollutant emissions, air quality effects are analyzed at a regional level. The maximum daily operational thresholds analyzed in the Draft EA represent the levels at which a project's individual emissions would result in a cumulatively considerable contribution to the regional air basin's air quality conditions. Because project-related emissions would be below these thresholds, the project would not result in an adverse cumulative effect on air quality.

The cumulative context of greenhouse gas emissions is the global scale. As indicated in the Draft EA Table 4-2, the Proposed Action's operational GHG emissions would be 2,107 metric tons of carbon dioxide equivalent (MT CO2e) per year, and the Clean Air Act project Reporting Limit is 25,000 MT CO2e. The project is located in a built out urban area with access to mass transit and other alternative modes of transportation, which would reduce GHG mobile-source emissions. As indicated above, the project would also consume less power than comparable detached residential development, thereby reducing point-source emissions from power plants. Therefore, the Proposed Action, in combination with cumulative development, would not result in cumulative adverse effects related to global climate change effects.

5.2.3.7 Environmental Design—Visual Quality, Coherence, Diversity, Compatible Use and Scale

The geographic extent of cumulative design analysis is the surrounding neighborhood that can be visually experienced in the same duration as the project site. As discussed in the Draft EA, the proposed new buildings would be designed to complement the architectural character of the remaining landmark buildings and the surrounding neighborhood. The taller buildings would be constructed on the lower half of the project site, with the hill behind these buildings providing a visual backdrop when looking in a westerly direction and reducing their effective height in views from the north and west. The construction of Waller Park through the site would provide a continuation and visual connection to the street to the west. The overall variation of building heights is intended to relate to the size and scale of buildings across Buchanan and Laguna Streets while accounting for the site's topography.

Cumulative development would focus along Market Street, south the project site, and in the Market-Octavia Plan area, east of the project site. This development would increase overall height and bulk in the area, but the buildings would be designed to complement the built form of the neighborhood, pursuant to the Market-Octavia Plan. Moreover, the concentration of this development south and east of the project site would continue to reduce their effective height in views from the north and west. Therefore, cumulative development would not combine with the Proposed Action to result in adverse cumulative visual effects.

5.2.3.8 Socioeconomic

The geographic extent of cumulative socioeconomic effects is the City as a whole. As indicated in the Draft EA, the Proposed Action would not result in adverse effects related to demographic character changes, and it would help to satisfy a portion of the existing high demand for housing. Population effects would not be considered substantial in the context of the surrounding urban neighborhood or the city as a whole, and the project's density would fall within the range of densities of the surrounding blocks. The Proposed Action would not displace existing homes, businesses, or farms, and it would result in a slight increase in the employment and income patterns of the project site vicinity. Therefore, the Proposed Action would result in potentially beneficial cumulative socioeconomic effects.

5.2.3.9 Community Facilities and Social Services

The geographic extent of cumulative effects on community facilities and social services is the service area of these providers and amenities. The Proposed Action would not result in a substantial new student population, and additional students would not exceed the capacity of schools in the area. The project would be served by existing commercial and health care facilities, and the project site populations could be positively affected by proximity to these services. Therefore, the Proposed Action would result in potentially beneficial cumulative effects.

5.2.3.10 Solid Waste, Water, Wastewater, and Stormwater

The geographic extents of cumulative utilities analyses are the service areas of each provider. For example, the solid waste cumulative geographic context includes all areas served by the applicable landfill, and the geographic context of cumulative water effects includes the service area of the San Francisco Public Utilities Commission.

The Proposed Action would not substantially increase the demand for solid waste removal service beyond what is already provided for in the City as a whole, and it would not hinder the City of San Francisco from meeting is per-resident target disposal rate of 6.6 pounds per day (PPD). Regarding water and, the Proposed Action would consume about 73,102 gallons per day, which would represent a less-than-considerable contribution [0.09 percent (0.09 of 1.0 percent)] to system-wide cumulative water demand. An equal amount of wastewater generated from the Proposed Action would represent a less-than-considerable contribution [0.006 percent (0.006 of 1 percent)] to system-wide cumulative average dry weather flow. Finally, regarding stormwater, the project site is already built out with impervious surfaces. Therefore, the Proposed Action would not increase stormwater flows.

Comprehensive regulatory requirements that have been in place for many years have been designed to ensure that adverse individual and cumulative effects from development activities would not occur on public utilities. Past projects have been required to comply with these regulations. For example, all proposed development in the City is required to conform to the Construction General Permit, Wastewater Discharge Permit Orders, Municipal NPDES permits, and potentially General Permit Orders for certain types of construction dewatering. To obtain coverage under these permits, cumulative development projects would be required to implement construction BMPs. Present and future projects must also meet these requirements.

Therefore, the Proposed Action, in combination with cumulative development, would not result in cumulative adverse effects on solid waste, water, wastewater, and stormwater utilities.

5.2.3.11 Public Safety (Police, Fire, and EMS)

The geographic extent of cumulative effects to fire and police protection is the service area of these providers. The project site is within a built out urban environment where police, fire, and emergency medical services (EMS) services are already provided. The Proposed Action—combined with past, present, and reasonably foreseeable future development—would be served by this existing infrastructure. Although these developments would result in an overall increase in demand, they would not be substantial in light of the existing demand for these services in the Market-Octavia and Hayes Valley area. Cumulative effects would not be adverse.

5.2.3.12 Open Space and Recreation

The cumulative context for open space and recreation analysis includes the neighborhood, citywide, and regional cultural spaces and parks. The Proposed Action would result in provision of a new public open space for the project site vicinity: Waller Park. It would also be served by

existing public open spaces, recreational areas, and cultural facilities in the City of San Francisco. The Proposed Action's 440 units, in combination with cumulative development, would increase demand for these facilities, but the demand would be dispersed among the extensive catalog of these facilities in the Bay Area region. Therefore, cumulative effects would not be adverse.

5.2.3.13 Transportation

The geographic extent of cumulative traffic analysis includes nearby intersections and transportation infrastructure that would be traversed by project-related trips. The Proposed Action's cumulative effects on transportation are explicitly discussed in the Draft EA:

> Regarding cumulative traffic impacts, the 2008 55 Laguna Mixed Use Project EIR states that while operations at three intersections (Market/Octavia Street, Market/Church/ 14th Streets, and Market/Laguna/Hermann/Guerrero Streets) would worsen to an unacceptable LOS condition under 2025 Cumulative conditions, project trips would not materially affect overall LOS performance to those intersections, would not represent a considerable contribution to 2025 Cumulative conditions, and would not have a significant cumulative traffic impact. As described above, the current project would generate fewer vehicle trips than the project analyzed in the 2008 EIR.

Although the Proposed Action would have different site access points than the 2008 project, the transportation analysis found that the Proposed Action's contribution to cumulative conditions at area intersections would be similar to the previous project and would not be considerable. Cumulative effects to parking, transit, and pedestrian and bicycle circulation were also found to not be adverse because the project would be served by existing infrastructure in a built-out urban area.

5.2.3.14 Natural Features

As discussed above, the Proposed Action would not combine with past, present, and reasonably foreseeable future project to result in an adverse effect on system-wide water demand. The project site is within a built out urban area and does not contain unique natural features or agricultural lands. Therefore, the Proposed Action would not combine with cumulative development to result in adverse effects on these resources. Finally, regarding vegetation and wildlife, the project would comply with **Mitigation Measure 1.2.2**, **Biological Resources**, which would ensure the protection of breeding birds. Given the project site's location in an urban area and the lack of endangered species at the project site—and the location of past, present, and reasonably foreseeable future development in the same built-out urban area—cumulative effects on vegetation and wildlife would not be adverse. Additionally, past, present and reasonably foreseeable future projects have been and would continue to be subject to landscaping and tree replacement and planting requirements thereby further reducing any potential for adverse cumulative effects.

5.2.4 Other Factors

As discussed above, the project site is not located in a 100-year or 500-year floodplain, and it is located well outside of airport and runway clear zones and safety zones. It is also outside all Coastal Barrier Resources System areas. Therefore, the Proposed Action would not combine with cumulative development to result in adverse effects related to these factors.