

U.S. Department of Housing and Urban Development 451 Seventh Street, SW Washington, DC 20410 www.hud.gov

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Environmental Assessment Determinations and Compliance Findings for HUD-assisted Projects 24 Code of Federal Regulations [CFR] Part 58

Project Information

Project Name: 4200 Geary Project

Responsible Entity: San Francisco Mayor's Office of Housing and Community Development One South Van Ness Avenue, Fifth Floor San Francisco, California 94103

Grant Recipient (if different than Responsible Entity): San Francisco Housing Authority

State/Local Identifier:

Preparers: Katherine Green, AICP, Senior Planner

Certifying Officer Name and Title: Eric D. Shaw, Director, San Francisco Mayor's Office of Housing and Community Development (MOHCD)

Consultant (if applicable): Rincon Consultants, Inc.

Direct Comments to: Lorena Guadiana, Environmental Compliance Coordinator, MOHCD at lorena.guadiana@sfgov.org

Project Location:

The project site is comprised of one parcel (Block 1438, Lot 053) (located at 4200 Geary Boulevard and 383 6th Avenue in San Francisco, California. The site measures approximately 0.4acres (16,750 square feet) and is located on the northwest corner of Geary Boulevard and 6th Avenue. The site is developed with a funeral home and surface parking adjacent to the north along 6th Avenue. The site is located in the City's Richmond District, within the Inner Richmond neighborhood. The site includes two lots that serve as surface parking fenced off on the eastern and southern frontages. It carries the 40-X Geary Boulevard Neighborhood Commercial zoning district (NCD) designation. The neighborhood is comprised of residential and commercial land uses and developed with both multi-family residences and commercial/retail buildings along Geary Boulevard. Properties in the vicinity of the site include multi-family residences, parking lots, miscellaneous commercial buildings and retail, restaurants, a preschool, and a medical center.

Figure 1 shows the regional location of the site and Figure 2 shows its specific location within the neighborhood.

Description of the Proposed Project [24 CFR 50.12 & 58.32; 40 CFR 1508.25]:

The project would involve the demolition of existing structures and the construction of a 98-unit, 7-story (78 feet) senior housing development consisting of 41 studios and 57 one-bedroom units with ground floor commercial space and resident amenities. The total gross building area would be 79,529 square feet (sf), with an approximate total of 5,941 sf of open space. The ground floor of the building includes residential support services, such as a community room and kitchen, laundry room, workshop, trash room, supply room, and private office spaces. Open space would be provided in the form of a 4,187 sf ground-floor, interior corner yard with landscaped planters and a permeable paver courtyard with seating. The remaining open space would be provided by two terraces on the 7th floor: one with a paver patio and ornamental raised planter boxes, the other with an "urban farm" design for a productive food garden. Additional streetscaping along the Geary Boulevard and 6th Avenue includes in-ground plantings and street trees with permeable paver accents. Approximately 18 indoor bicycle parking spaces and six outdoor bike racks would be provided. No vehicular parking spaces are proposed. The project includes numerous sustainability measures and aims for a Platinum Green Point Rating (GPR). Table 1 summarizes the main project components.

Table 1: Project Summary			
Use	Total		
Residential	50,443 sf		
Common	1,209 sf		
Commercial	1,124 sf		
Gross Ground Floor Area	12,535 sf		
Gross Second Floor Area	11,438 sf		
Gross Third Floor Area	11,652 sf		
Gross Fourth Floor Area	11,638 sf		
Gross Fifth Floor Area	11,609 sf		
Gross Sixth Floor Area	11,458 sf		
Gross Seventh Floor Area	9,199 sf		
Total Gross Building Area	79,529 sf		
Open Space	5,941 sf		
Number of Dwelling Units	98 Units		

Table 1. Draiget Summary

Bicycle Parking Spaces	18 spaces + 6 outdoor racks
Building Height	78 feet
Number of Stories	7

The proposed structure would be rectangularly shaped on most sides, fitting the shape of the lot where the building fronts Geary Boulevard (to the south) and 6th Avenue (to the east). One side of the building forms a diagonal facade compared to the rest of the rectilinear structure, and fronts the main courtyard open space. The main courtyard would be located on the ground floor. In addition, two terraces would be included on the 7th floor. Street trees and plants would be planted along the Geary Boulevard and 6th Avenue frontages.

Project construction is anticipated to endure approximately 21 months, starting in February 2023. Approximately 1,475 cubic yards of material is anticipated to be imported from off-site sources.

The project is being processed under Assembly Bill (AB) 1763, which allows an unlimited density in 3 additional floors and using a maximum of four concessions or incentives. The project requests the allowance of 3 additional floors (totaling 33 feet of height) and form-based density which would allow for 98 units (1 unit per 150 sf). Of the 98 units, one manager's unit would be included on site at 4200 Geary. Twenty percent of the units (10 studios and 10 one-bedroom apartments) would serve formerly homeless seniors (up to 15 percent of the Area Median Income [AMI]). Another 30% (15 studios and 15 one-bedroom units) would be serve Very Low Income seniors (15-20% of AMI). 12 one-bedroom units are proposed to be Project Based Vouchers (PBV) units, which would house homeless veterans. The remaining units in the building (16 studios and 19 one-bedroom units) would be assigned to more general affordable housing for seniors (up to 45% of AMI). One one-bedroom unit is set aside for a general manager's unit. Additionally, the applicant is requesting an incentive as part of the individually requested density bonus program to reduce the amount of required open space.



Fig 1 Regional Location



Figure 2 Project Site Vicinity

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Statement of Purpose and Need for the Proposal [40 CFR 1508.9(b)]:

The availability of housing, particularly affordable housing, is an ongoing concern in the San Francisco Bay Area. The regional council of governments, Association of Bay Area Governments (ABAG), estimates that at least 38 percent of new housing demand will be from low and very low-income households (households earning 80 percent, or less, of area median income), and another 19 percent will be 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 (City) would need to add 82,069 new units to its total housing supply by the year 2030. Of the 82,069 new units, 20,867 would need to be very low income, 12,014 would need to be low income, 13,717 would need to be moderate income, and 35,471 would need to be above moderate income.

City policies call for increased development of affordable housing within the City. The City's General Plan's Housing Element states, "[a]ffordable 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." Furthermore, 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." The Housing Element identifies that the "high cost of housing leads to numerous troublesome effects including overwhelming rent burden; overcrowding as more people squeeze into smaller affordable units to share costs; an increase in workers per household needed to pay mortgage or meet monthly rent; increased commuter traffic from San Francisco job holders who cannot afford to live in the city; and an increase in the homeless population."

Additionally, seniors living independently have a need for a broad range of on-site and off-site services including central dining, transportation services, limited or complete medical care, recreational and other services, and there is a need for safe and easily maintained dwelling units. According to the City's Housing Element, approximately 61 percent of elderly and one-to-two-person household renters with low to very low-income overpay on rent, and 46 percent of those who own homes overpay. In contrast, 53 percent of elderly and one-to-two-person household renters of moderate means overpay on rent, and 34 percent of those owning homes overpay. Generally, a larger proportion of lower income households have heavier housing burdens.

The 4200 Geary project is programmed to comply with these policies by providing 100 percent affordable senior living apartments in the Richmond District. The provision of 98 affordable housing units would accommodate a portion of the ABAG-projected demand for affordable housing. Furthermore, the proposed action would provide affordable housing to seniors in an area that is well-served by public transit, including local transit lines that connect to major transit centers such as the Civic Center/UN Plaza Bay Area Rapid Transit (BART) station. San Francisco Municipal Railway (MUNI). It would provide housing connected by public transportation to major employment, retail, and cultural centers in the City. Finally, the proposed action would support the City's goals of ending chronic homelessness and increasing the availability of affordable housing units specifically for seniors and the elderly.

Sources: Error! Reference source not found., Error! Reference source not found., 3

Existing Conditions and Trends [24 CFR 58.40(a)]:

The project site and surrounding properties are situated in the Inner Richmond neighborhood, of the City of San Francisco. The Inner Richmond neighborhood is generally bounded by Fulton Street to the south, 19th Avenue to the west, the Presidio and Presidio Heights to the north, and Arguello Boulevard and Masonic Avenue to the east. As shown in The median annual household income of Census Tract 402, based on the 2019 ACS, is \$107,475. The estimated median income in this area is approximately 4.5 percent less of that of the entire City and County of San Francisco (\$112,449).

Figure 3, the project site is located in the 40-X Geary Boulevard Neighborhood Commercial Zoning District (NCD). The NCD applies to the lots on either side of heavily trafficked thoroughfares and transit routes including, but not limited to, Geary Boulevard and Clement Street in the Richmond District. The NCD provides for a mix of moderately large commercial uses and buildings, with an emphasis on neighborhood-serving businesses and housing development. The NCD's do not include off-street vehicular parking requirements in support of ensuring walkability and transit orientation. Under current zoning, the site's capacity is limited by its Height and Bulk designation, 40-X, which caps the maximum allowable height at 40 feet. However, allowances under AB 1763 would permit the project to be constructed at its proposed height of 78 feet.

The rectangular, 0.4-acre (16,750-sf) project site is currently developed with a funeral home and surface parking spaces (see images in Figure 4). The site and adjacent street frontages lack ground-level vegetation, however median and street trees grow along Geary Boulevard, and seven street trees are located along the building edge of 6th Street. The parking area wrapping around the existing structure is currently closed off from public street access with chain link fencing and gates on the eastern and southern sides. The site contains two existing curb cuts for ingress/egress, one along 6th Street and one along Geary Boulevard.

A mix of institutional, commercial, and residential buildings surround the project site, as shown in Figure 2. The Kaiser Permanente Medical Center located southeast of the site includes two fourstory structures and one five-story structure. Two-story commercial establishments are located to the east of the site, and up to three-story mixed-use structures, with ground floor commercial establishments are located to the south. Residential structures, up to four stories high, are located north of the site.

The project site is well-served by public transit. Several on-street MUNI lines operate within one block of the site, including: 2-Clement, 44-O'Shaughnessy, 38AX- Geary A Express, 38BX-Geary B Express, 38R-MUNI Rapid Bus, and 38-Geary. In addition, on the corner of 6th Avenue and Geary Boulevard, the same corner the site is located, there is a MUNI stop for four MUNI lines, all of which provide residents access to the more centralized Civic Center/UN Plaza Station. Civic Center/UN Plaza Station is located 3.5 miles east of the project site and provides both BART and MUNI train service. BART provides high-speed, high-frequency service to downtown San Francisco, the San Francisco International Airport and portions of the Peninsula, and to downtown Oakland, Berkeley and the East Bay.

The project site is located within U.S. Census Tract 402, which is generally bounded by Geary Boulevard to the south, Clement Street to the west, the Presidio to the north, and 6th Avenue to the

east. According to the 2019 U.S. Census American Community Survey (ACS), this tract has a population of 5,200 with an average household size of 2.3 people. Relative to the County's average household size of 2.4, as of 2019, households in Census Tract 402 are about 4 percent smaller.

The median annual household income of Census Tract 402, based on the 2019 ACS, is \$107,475. The estimated median income in this area is approximately 4.5 percent less of that of the entire City and County of San Francisco (\$112,449).



Figure 3Project Vicinity Zoning Map

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Fig3 Project Vicinity Zoning Map



Photo 1 - View of the project site from the southwest corner looking east toward 6th Avenue.



Photo 2 – Architectural detail of the project site from the southwest corner looking north.



Photo 3 – View of the project site from the northeast corner facing south, showing the rear of the existing building.



Photo 4 - View from the northeast corner of the project site facing north. There are existing residences immediately to the north and west of the site.

San Francisco is one of the nation's most expensive cities with one of the highest median listed rents in the nation. According to the Compass' Home Sales, Prices, and Trends in the San Francisco Bay Area report, the average rent in San Francisco peaked in late 2019, just before the COVID-19 pandemic, to approximately 110 percent higher than three years earlier. Through the pandemic, the State of California implemented rent protections to keep those affected by COVID-19 from losing their homes. Currently, 2021 rent rates in the city have leveled out to approximately the same rates from three years earlier in 2018. However, housing prices have continued to increase, and average prices for homes in the Inner Richmond and Lone Mountain neighborhoods are up approximately 206 percent since 2012. Census Tract 402 had approximately 2,603 housing units in 2019 and the majority of these (76 percent) were part of multi-unit complexes. In 2020, the City had approximately 401,916 housing units, and 40 percent were part of multi-unit complexes with five or more units per building, with 50 percent in multi-unit complexes with five or more units per building.

According to the most recent Housing Element of the City's General Plan (2014-2022), the City plans to add 30,000 new housing units by the year 2020, a majority of which would be set aside as affordable housing for families with incomes that are 80 percent to 150 percent of the City's median income. General Plan policies intend to promote building affordable housing on city-owned properties, hiring more staff to speed along permitting for new construction, and exploring affordable housing incentives for developers.

Sources: 4, 5, 6, 7, 8, 9

Funding Information

Grant Number	HUD Program	Funding Amount	
	Project Based Voucher	\$211,680 annually	

Estimated Total HUD Funded Amount: \$4,233,600 (20 year period)

Estimated Total Project Cost (HUD and non-HUD funds) [24 CFR 58.32(d)]: \$80,000,000

Compliance with 24 CFR 50.4, 58.5, and 58.6 Laws and Authorities

Record below the compliance or conformance determinations for each statute, executive order, or regulation. Provide credible, traceable, and supportive source documentation for each authority. Where applicable, complete the necessary reviews or consultations and obtain or note applicable permits of approvals. Clearly note citations, dates/names/titles of contacts, and page references. Attach additional documentation as appropriate.

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6 STATUTES, EXEC and 58.6	Are formal compliance steps or mitigation required? UTIVE ORDI	Compliance determinations ERS, AND REGULATIONS LISTED AT 24 CFR 50.4
Airport Hazards 24 CFR Part 51 Subpart D	Yes No	The nearest civil airports to the site are the San Francisco International Airport and the Oakland International Airport. Both airports are located approximately 13 miles away, to the south and southeast, respectively. The project site is not within either airports' influence areas and the site is not located in a civilian airport runway clear/potential zone. In addition, the project site is not within either the San Francisco or Oakland Airport's building height referral areas. There are no military airfields within 15,000 feet of the site. The proposed action would not result in a significant airport-related safety hazard. Source List: 10, 11, Attachment F
Coastal Barrier Resources Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]	Yes No	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 US Virgin Islands, and the Great Lakes and consist of 857 units. No designated coastal barrier areas exist on the west coast; therefore, the project is not located in a coastal barrier area and would not conflict with the Coastal Barrier Resources Act. Source List: 12
Flood Insurance Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]	Yes No	The project site is not located within a Federal Emergency Management Agency (FEMA) designated 100-year floodplain or 500- year floodplain identified on the Preliminary and Revised Floodplain Maps prepared for the City of San Francisco (FEMA 2015; FEMA 2019) or the most recent Flood Insurance Rate Map (FIRM) provided by FEMA (FEMA 2021). The project site is not located in a FEMA designated Special Flood Hazard Area. The project is located in an area of minimal flood hazard Zone X (Map Number 0602980113A, effective March 23, 2021). Therefore, flood insurance purchase is not required (City and County of San Francisco 2016). The proposed

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		action would not conflict with the Flood Disaster Protection Act or National Flood Insurance Reform Act.
		Source List: 13, 14, 15, 16, 17
STATUTES, EXECUTIVE	CORDERS, AND	REGULATIONS LISTED AT 24 CFR 50.4 & 58.5
Clean Air Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93	Yes No	The federal Clean Air Act (CAA) requires each state to identify areas that have ambient air quality in violation of federal standards. An area's compliance with federal ambient air quality standards 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 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-marginal for the federal 8-hour ozone standard and nonattainment-marginal for the federal 8-hour ozone standards. The Bay Area is designated as attainment or unclassified for the other federal ambient air quality 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 nonattainment areas. SIP elements are developed on a nollutant-hy-pollutant basis whenever one or more air
		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 California Air Resources Board (CARB) is the state agency responsible for regulating air quality. CARB's responsibilities include establishing state ambient air quality standards, emissions standards, and regulations for mobile emissions sources (e.g., autos and trucks), as well as overseeing the efforts of countywide and multi-county air pollution control districts, which have primary responsibility over stationary sources.
		The Bay Area Air Quality Management District (BAAQMD) is the responsible regional air pollution control agency in the San Francisco Bay Area. The ozone SIP for the Bay Area was initially prepared in 1991 and was amended in 1999 and 2001. Since the 2001 SIP was prepared, the United States Environmental Protection Agency (USEPA) has revoked the 1-hour ozone standard and established the new 8-hour standard. State-mandated clean air plans were developed by BAAQMD in 1994, 1997, 2000, 2005, 2010, and 2017.
		With respect to ambient air quality standards, California classifies areas of the state as attainment, nonattainment, nonattainment-transitional, or unclassified. The Bay Area is designated as nonattainment for the state standards for ozone, particulate matter less than 10 microns in diameter (PM_{10}) and $PM_{2.5}$ and as attainment or unclassified for the other state ambient air quality standards.

Construction a	nd Operational Emiss	sions
CAA conformit are 100 tons per	y thresholds applicab	le in the San Francisco Bay Area ns per year of $PM_{2.5}$, and 100 tons
(Ordinance 176- preparation, der health of the g nuisance compl of Building Ins San Francisco E Francisco Cons preparation wor that could created	-08) would reduce the nolition, and construct general public and or aints and avoid orders pection. San Francisc Building Code Section truction Dust Control rk, demolition, or oth e dust or expose or dis	rancisco Dust Control Ordinance quantity of dust generated by site tion work in order to protect the n-site workers, minimize public to stop work by the Department to Health Code Article 22B and 106A.3.2.6 (collectively, the San l Ordinance) require that all site er construction in San Francisco sturb more than 10 cubic yards or pecified dust control measures.
Ordinance (Sar	r Francisco Building following or equival	t site would be required by the Code Section 106A.3.2.6.3) to ent measures acceptable to the
 airborne; Providing as creating run- Wet sweep intersections covering inac Covering any square feet o or use other o Using dust of 	s much water as nec off) for dust generatir ing or vacuuming where work is in pro- ctive stockpiles of des y inactive stockpiles g of material with a 10 m equivalent soil stabiliz	streets, sidewalks, paths and gress at the end of each workday,
calculated usin (CalEEMod) v results). Constru- project-specific project size. I provided, and t yards of soil im	ng the California ersion 2020.4.0 (see action would last appr provided construction n addition, a proje the project would req ported onsite (see Atta	d with the proposed action were Emissions Estimator Model e Attachment A for modeling oximately 17 months, based on a n schedule for the land uses and ct-specific equipment list was uire approximately 1,457 cubic achment A). The proposed action the San Francisco Dust Control
		d operational emissions for each shown in the tables below.
Tab	le 2: Construction Air	r Pollution Emissions
		nstruction Emissions (tpy)
Pollutant	CalEEMod Estimate	•
Ozone ¹	4	100
PM _{2.5}	<1	100
CO	5	100

¹ Highest of ozone precursors emissions (reactive organic gases or nitrogen
oxides)

tpy = tons per year

Source: CalEEMod 2016 Versions 2020.4.0, Annual Emissions, Table 2.1 "Overall Construction-mitigated." See Attachment A.

Table 3: Annual Operational Air Pollution Emissions

	Maximum Operational Emissions (tpy)			
Pollutant	CalEEMod Estimate CAA Conformity Thresholds			
Ozone ¹	1	100		
PM2.5	<1	100		
СО	3	100		

¹Highest of ozone precursors emissions (reactive organic gases or nitrogen oxides)

tpy = tons per year

Source: CalEEMod 2016 Versions 2020.4.0, Annual Emissions, Table 2.1 "Overall Operational-unmitigated." See Attachment A.

As shown in Table 2 and Table 3, development of the proposed project would not generate emissions exceeding CAA conformity thresholds.

Source List: 19, 20, 21, 22, 23, 24, 25, Attachment A

Consistency with the California Air Resource Board (CARB) Land Use Advisory Recommendations and Compatibility of Project Related Land Uses

CARB's Air Quality and Land Use Handbook, A Community Health *Perspective*, provides land use advisory recommendations regarding proposed actions. The handbook recommends that new sensitive uses not be sited within 500 feet of a freeway, due to higher exposure to diesel particulate matter (DPM) from motorized vehicles. The project site is located approximately 0.4 miles east of State Route 1. While the project site is located more than 500 feet away from a freeway, Article 38 of the San Francisco Health Code requires projects to include enhanced ventilation without modelling of air pollutant concentrations, or determine if the project would require enhanced ventilation by doing site-specific modelling or by identifying whether its location is inside or outside the Air Pollutant Exposure Zone. As mapped by the Planning Department in 2020, the project site is located within an Air Pollutant Exposure Zone. Therefore, consistent with Article 38 and CARB's recommendations, the applicant would either be required to perform air quality monitoring and analysis under development conditions, or the would be required to incorporate enhanced ventilation in the on-site buildings. No mitigation is necessary.

Source List: 23, 26

Odors

Objectionable odors are typically associated with industrial uses such as agricultural facilities (e.g., farms and dairies), refineries, wastewater treatment facilities, and landfills. In urban areas, this may also include facilities with a high volume of diesel-fueled vehicles, such as bus depots. The project site is not located near a facility expected to result in nuisance odors, including diesel exhaust odors. BAAQMD's

Coastal Zone Management Coastal Zone Management Act, sections 307(c) & (d)	Yes No	 California Environmental Quality Act Air Quality Guidelines (Table 3-3) contains a list of land uses/types of operation associated with odors and residential land uses are not part of that list. Therefore, the project would not be expected to generate objectionable odors that would affect a substantial number of people. Source List: 19 The project site is not within a Coastal Zone Management (CZM) area and the project does not involve the acquisition of undeveloped land in a CZM area. There would be no conflict with the Coastal Zone Management Act. Source List: 27
Contamination and Toxic Substances 24 CFR Part 50.3(i) & 58.5(i)(2)	Yes No	 Hazardous Materials Sites known to contain hazardous soils or groundwater conditions in San Francisco are governed by San Francisco Health Code Article 22A, also known as the Maher Ordinance, which is administered by the San Francisco Department of Public Health (SFDPH). The site is currently located in a mapped Maher Area. Harris & Lee Environmental Sciences, LLC conducted a Phase I Environmental Site Assessment (ESA) at the project site in November 2019 and a follow-up Limited Phase II ESA (Soil and Groundwater Sampling) in March 2020. Additionally, AEW Engineering, Inc. conducted an additional Phase II ESA in February 2021 with an update in April 2021. The Phase I, Limited Phase II, and Phase II ESAs are included as Attachment B and are summarized in detail below. A search of the State Water Resource Control Board's GeoTracker online database was conducted on January 14, 2022. The search identified 14 listed sites within a 2,000-foot radius, all of which are listed as completed-case closed. A search of the California Department of Toxic Substance Control EnviroStor database conducted on January 14, 2022. The search identified two listed sites within a 2,000-foot radius, one located at 393 7th Avenue and the other at 4723 Geary Boulevard. Both sites have been referred to local agencies. Hazardous Conditions On-site The Phase I and Limited Phase II ESA revealed evidence of recognized environmental conditions (RECs) and Historical RECs in connection with the project site, likely caused by its previous use as a funeral home. RECs typically consist of the presence or likely presence of hazardous substances in, on, or located within a property. The Limited Phase II ESA identified elevated levels of metals and diethyl phthalate, a semi-volatile organic compound (SVOC), in the groundwater samples, and detected levated levels of metals and identyl phthalate, a semi-volatile organic compound (SVOC), in the groundwater, which would be considered a REC as

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	 "A second round of soil vapor sampling with additional sampling points is recommended to better determine the risk from subslab vapor intrusion." This round of testing was conducted for the updated Phase II ESA performed by AEW Engineering, Inc. in April 2021. As a result of their findings, the following recommendation was made: "Mitigation measures may be required to address potential vapor intrusion impacts from subsurface tetrachloroethene at the Project Site. Mitigation may include installation of a passive soil venting system beneath the slab of the proposed building. If a soil venting system is required by SFDPH, the design drawings and specifications of the system will be submitted to SFDPH for review and approval." Dust mitigation during construction shall include appropriate and applicable dust management and monitoring protocols as required by Article 22B requirements and CCRs Title 17 Section 93105; Proper soil and waste management and handling protocols shall be developed and implemented by the future contractor to address the handling and management of soil and waste on this project at the site To ensure the safety of personnel during construction, a health and safety program shall be developed and implemented to protect workers from exposures to chemicals in accordance with the applicable federal and state Occupational Safety and Health Administration's (OSHA) regulations
	The following Mitigation Measures have been developed, which would serve to mitigate both construction impacts and the long-term environmental or health and safety risks caused by the presence of the identified hazardous materials on-site.
	Mitigation Measures
	Regulatory Agency Involvement – SAM. Because there is an open Cleanup Program case (San Francisco Department of Public Health, Environmental Health Branch [EHB] Site Assessment and Mitigation Program [SAM] case #SMED 2009) on the project site, EHB-SAM shall continue to be utilized for agency oversight of assessment and remediation within the project through completion of building demolition, subsurface demolition, and construction of facilities. Additionally, the applicant shall notify the EHB-SAM project manager of the following:
	 Current development plan and any modifications to the development plan Unexpected underground features All former environmental documents completed for the project site
	Upon notification of the information above, EHB-SAM could require actions such as: development of subsurface investigation workplans; completion of soil, soil vapor, and/or groundwater subsurface investigations; installation of soil vapor or groundwater monitoring wells; soil excavation and offsite disposal; completion of human health risk assessments; and/or completion of remediation reports or case closure documents. The project applicant will retain a qualified environmental consultant (Professional Geologist [PG] or Professional

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	Engineer [PE]) to conduct additional assessment or remediation work as required by SAM.
	If groundwater wells, soil vapor monitoring probes, or sub-slab vapor points are identified during demolition, subsurface demolition, or construction at the project site, they will be abandoned/destroyed by a qualified environmental consultant under permit from the City and County of San Francisco, Department of Public Health – EHB. Demolition activities will be documented in a letter report submitted to EHB-SAM within 60 days of the completion of abandonment activities.
	It should also be noted that EHB-SAM may determine that SFBRWQCB or California Department of Toxic Substances Control (DTSC) may be best suited to perform the lead agency duties for assessment and/or remediation at the project site. Should the lead agency be transferred to SFBRWQCB or DTSC, this and other mitigation measures will still apply to these agencies.
	Remediation. If soil present within the construction envelope at the development site contains chemicals at concentrations exceeding hazardous waste screening thresholds for contaminants in soil (California Code of Regulations [CCR] Title 22, Section 66261.24), the project applicant will retain a qualified environmental consultant (PG or PE) to conduct additional analytical testing and recommend soil disposal recommendations, or consider other remedial engineering controls, as necessary for the proposed development.
	The qualified environmental consultant will utilize the development site analytical results for waste characterization purposes prior to offsite transportation or disposal of potentially impacted soils or other impacted wastes. The qualified environmental consultant will provide disposal recommendations and arrange for proper disposal of the waste soils or other impacted wastes (as necessary), and/or provide recommendations for remedial engineering controls, if appropriate for the proposed development.
	The project applicant will review and approve the disposal recommendations prior to transportation of waste soils offsite, and review and approve remedial engineering controls, prior to construction. Remediation of impacted soils and/or implementation of remedial engineering controls may require additional delineation of impacts; additional analytical testing per landfill or recycling facility requirements; soil excavation; and offsite disposal or recycling.
	The lead agency and EHB-SAM will review and approve the development site disposal recommendations prior to transportation of waste soils offsite, and review and approve remedial engineering controls, prior to construction.
	Site Mitigation Plan (SMP) for Impacted Soils. When requested by EHB-SAM, the project applicant will retain a qualified environmental consultant (PG or PE), to prepare a Site Mitigation Plan (SMP) prior to construction. The SMP, or equivalent document, will be prepared to address onsite handling and management of impacted soils or other impacted wastes, and reduce hazards to construction workers and offsite receptors during construction. The plan must establish remedial measures and/or soil management practices to ensure construction worker safety, the health of future workers and visitors, and the off-site

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	migration of contaminants from the site. These measures and practices may include, but are not limited to:
	 Stockpile management including stormwater pollution prevention and the installation of Best Management Practices (BMPs) Proper disposal procedures of contaminated materials Monitoring and reporting A health and safety plan for contractors working at the site that addresses the safety and health hazards of each phase of site construction activities with the requirements and procedures for employee protection
	The health and safety plan will also outline proper soil handling procedures and health and safety requirements to minimize worker and public exposure to hazardous materials during construction.
	The lead agency and EHB-SAM will review and approve the development SMP for Impacted Soils prior to demolition and grading (construction).
	The project applicant has retained a qualified environmental consultant and prepared a SMP, which has been approved.
	Vapor Mitigation System Design. If necessary and requested by EHB-SAM, the project applicant will retain a qualified environmental consultant (PE) or other qualified person to prepare a sub-slab vapor mitigation system design for the proposed project.
	The sub-slab vapor mitigation system design will likely include the following components to be installed beneath the concrete slab(s) for proposed structures to be constructed as part of redeveloping the site:
	 Sub-slab vent system: Perforated horizontal pipes Vent risers Gravel surrounding perforated horizontal pipes and gravel blanket under impervious membrane (minimum 2-inch thickness) Impervious membrane (which is compatible with VOC vapor) Utility trench dams (if applicable) Conduit seals
	The project applicant and EHB-SAM will review and approve the sub- slab vapor mitigation system design prior to construction. Routine sub- slab vapor barrier construction quality assurance inspections will be required during the construction of the sub-slab vapor mitigation system. A certification report prepared by a qualified environmental consultant (PE) will also be required to document the proper installation of the sub-slab vapor mitigation system.
	Toxic Air Containments Off-site
	The BAAQMD has an online mapping tool that provides screening level risks and hazards for facilities permitted by the air district. The <i>Permitted Stationary Source Risks and Hazards Screening Tool</i> provides the chronic cancer risks (in millions), $PM_{2.5}$ concentration (micrograms per cubic meters [μ g/m ³]), and hazard indices at each facility. Permitted stationary sources were identified within 1,000 feet of the project's site boundary.

of the pr Source R. two diese 13516) an Police Do Service st source is ID 433). applied to each faci sources, f risk and h sources a The risks the BAA would ha • The s milli • The s or A • The incree The aggr considere	oject's fence isk and Haza el generators and the other b epartment (F- tation gas disp a miscellaneou The BAAQ of the cancer r lity. To eval the BAAQM hazards are use re compared from all the s QMD cumul ve an impact source would cute) risk of source would cute) risk of source would case of > 0.3 p egate total of d to have a cu	line using rds mappin with one being for the acility ID bensing fac us source a QMD's dis isk, PM2.5 buate the i D establish ed. The rish against the ources are ative-source if: result in a > 1.0 Hazard d result in ug/m3 annu c current an unulatively d result in a	g BAAQM ng tool (B being for ne City an 21727). T ility (Faci the Kais stance adj concentrat mpacts fr hed thresh is and haz BAAQM then comb then	identified within ID's <i>Permitted</i> AAQMD 2021 Pacific Bell (d County of Sa The third source lity ID 108991) er French Camp ustment multip ion, and hazard om the off-site olds for local ards from the sin D single-source bined and compa ld. Singular TA d non-cancer (i ient PM2.5 cc e ad TAC source able impact if: sed cancer risk ed non-cancer (i	<i>Stationary</i>). There are Facility ID in Francisco e is a Shell and the last ous (Facility pliers were l indices for e permitted community ingular TAC e threshold. ared against AC sources > 10 in one- .e., Chronic oncentration es would be of > 100 in
Table 4 1 singular a the permi source no sources o future on enhanced Health Co	and cumulativ tted stationar or the cumul f toxic air co site residents ventilation ode. e 4: Adjusted	sted screen ve BAAQM y sources d ative source ntainments a. Moreove required b	ning value AD thresho to not exce thresho s would ne er, risks w y Article and Cumu	es with compar- olds. As shown eed the BAAQM lds. Therefore, ot pose a health yould be lower 38 of the Sar	in Table 4, <i>I</i> D singular the offsite risk to the due to the rancisco
Source ID ¹	Description	Distance to Project Site (feet)	Cancer Risk (per million)	PM _{2.5} Concentration (µg/m3)	Increased Non- Cancer Risk (Chronic Hazard Index)
433	Kaiser French Campus	165	2.5	0.47	0.01
13516	Pacific Bell	825	1.6	< 0.01	< 0.01

		21727	City and County of San Francisco Police Department	500	0.2	0	0
		108991	Shell Service Station	860	0.3	0	<0.01
		Combine			4.6	0.50	< 0.01
		BAAQM	1D Singular So ld	ource	10	0.3	1
		Exceede			No	No	No
		Thresho			100	0.8	10
			ive Threshold			No	No
		Screenin Source:	IDs presented ag Analysis To Attachment G, List: 28, 29, 3	ol. Health Ris	k Report		ry Source
Endangered Species Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402	Yes No	San Fran parking a lacks exis Impleme an existin compoun endanger occupyin would ha and woul In additi (MBTA) 3503.5 of birds of destruction birds. Migrator special-st perimeter occurs du	cisco. The si and is surrou sting vegetati intation of the ng structure a id on a previ- ed species, or g or migrating we no effect of d be consiste ion, the USI and the Ba f the Fish and prey, and the on. Section 35 ns imposed b y or other co tatus species, r trees surrou iring the mig	te has bee inded by a on other the proposed and surfactionally dist r species s g through on natural nt with the FWS imp ld and G d Game C by the fede ommon ne are protection inding the ratory bird	n used as an urban han street l project ce parkin turbed ar ubject to the site. T habitats of e Endang lements olden Ea ode of Ca und eggs, Fish and eral MBT esting bin cted by th e project l nesting	s a funeral h environmen trees and ur would invol- g and constr ad graded sit the Endange herefore, the or federally p ered Species the Migrato against take Game Code a CA with resp rds, while no site. If proj season (gene	arbanized area in ome and surface it, and generally ban landscaping. ve demolition of uction of a new te. There are no red Species Act, proposed action rotected species, Act. ory Bird Treaty on Act. Section cifically protects e, possession, or also incorporates ect to migratory of designated as a may nest in the ect construction erally February 1 by a nest or cause
		a nest to a CFGC.	fail. Mitigatio	-		•	no violations of
		0	on Measure				
		Project c will requiprior to t shall surv	onstruction of ire a preconst he start of gr vey accessible	occurring ruction ne ound distu e areas wi	between sting bird ırbing ac thin 150	February 1 t l survey no m tivities. A qu feet (for pas	nd Monitoring. to September 15 nore than 14 days nalified biologist serines) and 500 and an active nest

		be identified, the qualified biologist will establish an avoidance buffer based on the needs of the species identified and pursuant to consultation with CDFW, if necessary, prior to initiation of construction activities. Avoidance buffers shall remain in place until the end of the general nesting season or upon determination by the qualified biologist that young have fledged, or the nest has failed. Should ground disturbance commence later than 14 days from the survey date, an additional preconstruction survey shall be conducted prior to reinitiating work. Should work activity cease for 5 days or greater during the breeding season, surveys shall be repeated to ensure birds have not established nests during inactivity. If buffer zones are determined to be infeasible, a full-time qualified biological monitor shall be on site to monitor construction within the buffer zones to avoid impacts to active nests and nesting birds. Source List: 32, 33
Explosive and Flammable Hazards 24 CFR Part 51	Yes No	The proposed residential and office uses on-site would not involve explosive or flammable materials or operations. The project site is not located near sites known to contain toxic or radioactive materials, nor is the project site located near thermal source hazards.
Subpart C		Harris & Lee Environmental Sciences, LLC conducted a Phase I ESA (Attachment B) at the project site in November 2019. The Phase I ESA identified one aboveground storage tank (AST) within 0.25 miles of the project site, located approximately 475 feet southeast of the site at a Toyota Parts and Service center at 4099 Geary Boulevard. Per aerial imagery, the tank is located indoors. According to the CalEPA Regulated Site Portal, the AST is an aboveground petroleum storage tank with a maximum container size of 900 gallons (Attachment B). Using the available information, HUD's Acceptable Separation Distance calculator was utilized to determine the minimum acceptable distance from this container is approximately 265 feet for persons and 47 feet for buildings. Since the tank is located beyond these minimum acceptable distances, no explosive hazards have been identified with this AST.
		Source List: Attachment B
Farmlands Protection Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658	Yes No	No protected farmlands are located within the City and County of San Francisco. The project site is developed with existing structures, zoned NCD (Neighborhood Commercial District), has been historically used for a funeral home and associated surface parking. The proposed action would have no impact on farmlands. The proposed action would not conflict with the Farmland Protection Policy Act. Source List: 32
Floodplain Management Executive Order 11988, particularly section 2(a); 24 CFR Part 55	Yes No	The project site is not located within a Federal Emergency Management Agency (FEMA) designated 100-year floodplain or 500- year floodplain identified on the Preliminary and Revised Floodplain Maps prepared for the City of San Francisco, or the most recent Flood Insurance Rate Map (FIRM) provided by FEMA. The proposed action would not conflict with provisions related to floodplain management.
Historic	Yes No	Source List: 16, 17, 18 Prehistoric Context
Preservation	\overrightarrow{M}	

National Historic Preservation Act (NHPA) of 1966, particularly sections 106 and 110; 36 CFR Part 800	During prehistoric times the San Francisco Bay region was sparsely populated. The earliest peoples currently known to have inhabited the San Francisco Bay Area were small hunter-gather groups whose subsistence was based on large game, seeds, and nuts, as evidenced by the presence of large projectile points and milling stones found at nearby archaeological sites. These peoples lived in small nomadic bands that made less use of shoreline and wetlands resources than later prehistoric populations.
	The native people living around San Francisco Bay at the time that Europeans arrived spoke five distinct languages, including Costanoan (Ohlone). Costanoan, a member of the Utian language family, was spoken throughout the Santa Clara Valley and foothills and along much of the East Bay and the San Francisco Peninsula.
	The Costanoan people, known as the Yelamu, occupied the northern end of the San Francisco Peninsula in the late eighteenth century. The Yelamu were divided into three semi-sedentary village groups and were composed of at least five settlements (Chutchi, Sitlintac, Amuctac, Tubsinte, and Petlenuc) within present day San Francisco. Yelamu may have also been the name of an additional settlement within the vicinity of Mission Dolores. Sitlintac may have been located on the bay shore, near the large tidal wetlands of the Mission Creek estuary. Chutchi was located near the lake (Laguna de los Dolores) east of the current Mission Dolores, two to three miles inland. These two villages were probably the seasonal settlements of one band of the Yelamu who used them alternately.
	Historic Context
	Prior to construction of the existing funeral home, the site housed the Richmond Lumber Company which contained several one-story woodframed offices and sheds. The current building was constructed in 1918 by local architect August G. Headman for Jacob Macowsky for an undertaking establishment with two flats on the second floor. He leased the property to Charles Ashley and Irving McMullen, of Ashley & McMullen funeral directors, who previously had an establishment at 325 Sixth Avenue. In 1928, Ashley purchased the adjacent lot and in 1931 began to make alterations to the building, including an expansion. The expansion continued in 1936 with the addition of the chapel building. Ashley & McMullen operated at this location until 1971 when it was sold to the Cathay Corporation, a subsidiary of Nicholas Daphne's chain of Bay Area mortuaries. Operated at the Cathay Mortuary-Win Sun, it catered to the Richmond District's growing Chinese and Chinese-American population. The building underwent several updates and changes during in the following years. Daphne died in 1990 and the business was passed to his daughter Daphne Daphne, who operated the business until it closed in 2019. The building is currently vacant.
	Regulatory Context
	National Historic Preservation Act and National Register of Historic Places
	Section 106 of the National Historic Preservation Act (NHPA) requires federal agencies to take into account the effects of their undertakings on historic properties. The Section 106 process seeks to accommodate historic preservation concerns with the needs of federal

undertakings through consultation among the agency officials and other interested parties, beginning at the early stages of planning of the undertaking. The goals of consultation are to identify historic properties potentially affected by the proposed action, to assess its effects, and to seek ways to avoid, minimize, or mitigate adverse effects on historic properties. The term "cultural resources" includes historic properties (buildings, structures, districts, landscapes, archaeological sites, Traditional Cultural Properties [TCPs], districts, and objects that are eligible for listing or that are listed on the National Register of Historic Places [NRHP]); cultural items, as defined in the Native American, Native Alaskan, or Native Hawaiian sites for which access is protected under the American Indian Religious Freedom Act of 1978; archaeological resources, as defined by the Archaeological Resources Protection Act of 1979 and the Antiquities Act of 1906, that are not eligible for listing or are unevaluated for listing on the NRHP; and archaeological artifact collections and associated records, as defined by 36 CFR Part 79.
To be eligible for listing on the NRHP, a cultural resource must meet specific criteria identified in 36 CFR Part 60 and explained in guidelines published by the Keeper of the National Register. ¹ The significance of effects on cultural resources is also determined by using the criteria set forth in the regulations implementing Section 106 of the NHPA. NRHP criteria (36 CFR, 60.4) are as follows:
 a. Association with events that have made a significant contribution to the broad patterns of our history; b. Association with the lives of persons significant to our past; c. Resources that embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or d. Resources that have yielded or may be likely to yield information important in prehistory or history.
In addition to historic significance, a property must have integrity to be eligible for the NRHP. This is the property's ability to convey its demonstrated historical significance through location, design, setting, materials, workmanship, feeling, and association.
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
The discussion of cultural resources is guided by an existing Programmatic Agreement (PA) between the City and County of San Francisco (City) and the California State Historic Preservation Officer (SHPO) pursuant to Section 106 of the National Historic Preservation Act (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

¹The most widely accepted guidelines are contained in the US Department of Interior, National Park Service, "Guidelines for Applying the National Register Criteria for Evaluation," *National Register Bulletin 15* (Washington DC: US Government Printing, 1991, revised 1995 through 2002).

	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 Effects (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.
	AREA OF POTENTIAL EFFECTS (Stipulation VI of the PA)
	Compliance with Section 106 requires the City to evaluate the effect of an Undertaking on historic properties within the APE that are eligible for listing in the NRHP. The City identified the APE for architectural resources, in accordance with 36 CFR §800.16(d) to include the project site itself and 12 surrounding properties:
	 4200 Geary Boulevard (project site); 371 6th Avenue; 378 6th Avenue; 382 6th Avenue; 372 7th Avenue; 376 7th Avenue; 376 7th Avenue; 4141 Geary Boulevard: 4150 Geary Boulevard; 4201 Geary Boulevard; 4221 Geary Boulevard; and 4228 Geary Boulevard.
	For this project, the APE encompasses the area in which the undertaking may directly cause change (i.e., the project site itself) and where it may indirectly cause alterations in the character of historic properties (i.e., on surrounding properties). (See Attachment C for the APE Map).
	IDENTIFICATION AND EVALUATION OF HISTORIC PROPERTIES (Stipulation VII of the PA)
	Under Stipulation VII, Paragraph D, the City shall evaluate all properties that may be affected by an Undertaking using the National Register Criteria set forth in 36 CFR Section 60.4 and documented by the City on State of California Historic Resources Inventory Form – DPR 523. 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 Historic Properties.
	In accordance with Stipulation VII of the PA, the Planning Department of the City reviewed all existing information on all properties within the architectural APE for eligibility for listing in the National Register of Historic Places. This process involved a review of any existing State of California Historic Resources Inventory Forms (known as DPR 523 forms) for properties within the undertaking's APE. The Mayor's Office of Housing and Community Development (MOHCD) retained Rincon to prepare the DPR 523 forms for properties that had not been evaluated for listing in the NRHP. (See Attachment C for the DPRs).

The commercial building at 4200 Geary Boulevard that occupies the project site was included in the City of San Francisco's Property Information Map, indicating the property had previously been recorded in a Historic Resource Assessment prepared by VerPlanck Historic Preservation Consulting in 2020. It was not, however, previously evaluated for eligibility for listing in the NRHP. The San Francisco Planning Department determined that the property is not eligible for listing in the NRHP. <i>In addition to applicable NRHP designation criteria, the property at 4200 Geary Boulevard was evaluated using the registration requirements provided for in the Multiple Property Documentation Form (MPDF) Asian Americans and Pacific Islanders in California, 1850-1970, from which the property's historic context was derived.</i>
with the settlement patterns of Chinese and Chinese-Americans as they moved from San Francisco's downtown Chinatown to the western neighborhood of the Inner Richmond. In the late 1960s and early 1970s during the earliest expansion of the Chinese and Chinese American community into the Inner Richmond, however, the community continued to maintain their connection to San Francisco's
Chinatown. The earlier years of the growing Chinese neighborhoods to the Inner Richmond, within the period of significance identified in MPDF were largely connected to existing institutions in Chinatown, including its funeral homes like Daphne's Cathay Mortuary site at Jackson and Powell Streets and 4200 Geary does not appear to have
become an important location to the Chinese American community in San Francisco until the late 1970s and has not reached the significance threshold of 50 years necessary for listing in the NRHP. 4200 Geary does not represent a significant event, activity, or pattern of an area's development. Built in 1918 with an addition in 1936 and continuous updates, it was typical of the patterns of development in western San Francisco at the time. Archival research also failed to identify any information to indicate the subject property is significant either individually, or as part of a larger complex, for its association with the development of San Francisco or any other important events significant in the history of the city, region, state, or nation. As such, the property is not eligible for listing in the NRHP (Criterion A).
The building at 4200 Geary is not associated with the life of an important person. Though it was purchased by Nicholas Daphne, notable for his funeral businesses in the Bay Area, this location is not closely enough associated with him or his work. Archival research failed to uncover information that illustrated Daphne's achievements in the mortuary business related to 4200 Geary Boulevard and it is, therefore, not eligible for listing (Criterion B). The building at 4200 Geary does exhibit some elements of both Classical Revival and Gothic Revival elements. The Classical Revival elements of the 1918
portion of the building, however, have been significantly altered over time having received renovations to the exterior in the 1960s and 1970s. Designed by local architects August G. Headman (mortuary) and Arthur O. Johnson (chapel), it does not represent a particularly exemplary piece of either of their work, particularly in San Francisco. This along with its later alterations, diminishing its integrity, make it so that 4200 Geary does not appear eligible for listing (Criterion C).
371 6th Avenue: San Francisco Planning Department determined the

371 6th Avenue: San Francisco Planning Department determined the property is ineligible for listing in the NRHP. The two-story plus

ground floor, single family residence built in the Eclectic Style with Italianate features was built in circa 1906 and was occupied by a number of residents. The parcel was subdivided in 2010 for the construction of a second residence at the west end. The subject property continues to serve as a residence. It is a typical of residential development of the Richmond District and is not associated with the historic context in an important way (Criterion A). Archival research failed to indicate that any individuals with a documented association with the property were important to history (Criterion B). The property at 371 6th Avenue is typical of Richmond house featuring a ground floor and two floors of living area, sited up against the property line. It is built in the Eclectic style and exhibits some element of the Italianate Style such as its arched openings; however, these features are limited and it does not embody distinctive characteristics of a type, period, or method of construction and does not possess high artistic value (Criterion C). It is unlikely that it has potential to yield information important to our history or prehistory (Criterion D).
<i>378 6th Avenue:</i> San Francisco Planning Department determined the property is ineligible for listing in the NRHP. The two-story multifamily residence was constructed in 1915 and built in the Eclectic Style with French Revival elements. It is typical of residential development of the Richmond District and is not associated with the historic context in an important way (Criterion A). Archival research failed to indicate that any individuals with a documented association with the property were important to history (Criterion B). The property at 378 6th Avenue is typical of Richmond house featuring a ground floor and two floors of living area, sited up against the property line with a backyard. It is built in the Eclectic style and exhibits some element of the French Revival elements; however these features are limited and it does not embody distinctive characteristics of a type, period, or method of construction and does not possess high artistic value (Criterion C). It is unlikely that it has potential to yield information important to our history or prehistory (Criterion D).
<i>382 6th Avenue</i> : San Francisco Planning Department determined the property is ineligible for listing in the NRHP. The two-story basement, single family residence was constructed in 1916 by Leigh & Schultz for Patrick J. Horgan and features elements of the Early 20 th Century Revival Style. It is typical of residential development of the Richmond District and is not associated with the historic context in an important way (Criterion A). Archival research failed to indicate that any individuals, including the original owner Patrick Horgan, with a documented association with the property were important to

the Richmond District and is not associated with the historic context in an important way (Criterion A). Archival research failed to indicate that any individuals, including the original owner Patrick Horgan, with a documented association with the property were important to history (Criterion B). The property at 378 6th Avenue is typical of Richmond house featuring a ground floor and two floors of living area, sited up against the property line with a backyard. It is built in and Early 20th Century Revival Style but it does not embody distinctive characteristics of a type, period, or method of construction and does not possess high artistic value and is not the work of a known master. The associated builder, Leigh & Schultz had a short period of productivity and are not associated with any notable works (Criterion C). It is unlikely that it has potential to yield information important to our history or prehistory (Criterion D).

<i>372</i> 7 th Avenue: San Francisco Planning Department determined the property is ineligible for listing in the NRHP. The two-story plus ground floor commercial and residential building was constructed in 1908 as a single-family residence. In was converted to a mixed-use property in 1990 and does not represent any discernable architectural style. The original single-family house was built for Felix McHugh by architect John C. Flugger. After McHugh's death in 1935, the property has a series of owners and occupants. It is typical of residential development of the Richmond District and is not associated with the historic context in an important way (Criterion A). Archival research failed to indicate that any individuals, including the original owner Felix McHugh, with a documented association with the <i>property were important to history (Criterion B)</i> . The property line. Though designed by local architect John Flugger, the property line. Though designed by local architect John Flugger, the property loces at 372 7th Avenue is not representative of his work and does not express an important example of one of his designs. Additionally, several design elements were replaced or removed such as the original siding, windows, and all possible ornamentation. The building was further materially altered with the addition of third floor in 1989 and the conversion of the ground floor for commercial use in 1990. The building is not representative or for commercial use in 1990.
building is not recognized as it was originally designed (Criterion C). It is unlikely that it has potential to yield information important to our
history or prehistory (Criterion D).
<i>376 7th Avenue:</i> San Francisco Planning Department determined the property is ineligible for listing in the NRHP. The building, a two story plus ground floor single-family residence, was constructed in 1906. It was designed in the Eclectic Style with Italianate elements. It is typical of residential development of the Richmond District and is not associated with the historic context in an important way (Criterion A). Archival research failed to indicate that any individuals with a documented association with the property were important to history (<i>Criterion B</i>). The property at 376 7th Avenue is typical of Richmond house featuring a ground floor and two floors of living area, sited up against the property line with a backyard. It is designed in the Eclectic Style with Italianate features such as the dentil-like ornamentation at the roofline. However, these features are limited and it does not, however, embody the distinctive characteristics of a type, period, or method of construction and does not possess high artistic value (Criterion C). It is unlikely that it has potential to yield

380 7th Avenue: San Francisco Planning Department determined the property is ineligible for listing in the NRHP. The property is a two-story plus ground floor multi-family residence. Built in 1916 for owner and builder JC Kirby, the building does not feature any discernable architectural style. he multi-family residence is typical of the development of the Richmond District; however there is no information to suggest it is individually significant within this context or is associated with any other important events significant in the history of the city, region, state, or nation (Criterion A). Archival research failed to indicate that any individuals with a documented association with the property were important to history (Criterion B).

information important to our history or prehistory (Criterion D).

It does not reflect a discernable architectural style and does not embody distinctive characteristics of a type, period, or method of construction and does not possess high artistic value and is not the work of a known master. Archival research was unable to confirm its original architect and did not reveal any notable work by the builder and original owner JC Kirby (Criterion C). It is unlikely that it has potential to yield information important to our history or prehistory (Criterion D).
potential to yield information important to our history or prehistory
and the Student Center at San Francisco State University, both of which are better examples of both his work as and of Brutalist architecture (Criterion C). It is unlikely that it has potential to yield information important to our history or prehistory (Criterion D). <i>4150 Geary Boulevard:</i> San Francisco Planning Department determined the property is ineligible for listing in the NRHP. The subject property is a two-story fast food restaurant with a contemporary design. The building was constructed in 1968 as a Kentucky Fried Chicken (KFC) restaurant. the fast-food restaurant is

not typical of the development of the Richmond District; however, there is no information to suggest it is individually significant within

constructed during the Kentucky Fried Chicken's largest period of
expansion after having been sold to a group of investors and does not
represent a unique example of the restaurant's history or development
(Criterion A). Archival research failed to identify specific individuals
with a documented association with the subject property are
significant to our past (Criterion B). The property at 4150 Geary
Boulevard is typical of a 21st century KFC restaurant. It is
contemporary in design and original design elements from 1968 have
been removed. It does not represent an exemplary or distinctive
example KFC or fast food architecture. The building has been highly
altered and does not embody the distinctive characteristics of a type,
period, or method of construction and does not possess high artistic
value. It is not the work of a known master architect or building
(Criterion C). It is unlikely that it has potential to yield information
important to our history or prehistory (Criterion D).

4201 Geary Boulevard: San Francisco Planning Department determined the property is ineligible for listing in the NRHP. The subject property is a three story, plus basement mixed use property. Constructed in 1925, it is built in an Early 20th Century Revival style with Italianate details and was designed by San Francisco-based firm Beaumann & Jose for owner Joseph Varsi. The construction of 4201 Geary Boulevard is consistent with the general development trends of the Richmond District and there is no information to suggest it is individually significant within this context of is associated with any other important events significant in the history of the city, region, state, or nation (Criterion A). Archival research failed to indicate that any of the individuals with a documented association with the subject property, including the original owner and builder J. Varsi, are significant to our past (Criterion B). Built in an Early 20th Century Revival Style, it features typical design elements such as a projecting bay windows, smooth stucco exterior, and bracket details. Italianate detailing at the residential entry includes the arched opening and terra cotta ornamentation. However, the building has been altered through the replacement of original windows and the extensive changes of the storefront and therefore it is not a unique or noteworthy example of this property type or architectural style. Although designed by local firm Baumann & Jose, this does not represent an exemplary or distinctive example of their work for these same reasons (Criterion C). It is unlikely that it has potential to yield information important to our history or prehistory (Criterion D).

4215 Geary Boulevard: San Francisco Planning Department determined the property is ineligible for listing in the NRHP. The subject property is a two-story plus basement mixed-use building built in the Eclectic Style with Mission Revival elements. The building was constructed in 1919 and designed by Oscar Heyman & Brother. The construction of 4215 Geary Boulevard is consistent with the general development trends of the Richmond District and there is no information to suggest it is individually significant within this context of is associated with any other important events significant in the history of the city, region, state, or nation (Criterion A). Archival research failed to indicate that any of the individuals with a documented association with the subject property that significant to our past (Criterion B). The property at 4215 Geary Boulevard does not embody the distinctive characteristics of a type, period, or method

 of construction. It is built in the Eclectic Style with Mission Revival elements, such as its stepped parapet and balcony. It is not, however, representative of the style and does not possess high artistic values. Constructed by Oscar Heyman & Brother, it does not appear to be a notable or important example of their work (Criterion C). It is unlikely that it has potential to yield information important to our history or prehistory (Criterion D). 4221 Geary Boulevard: San Francisco Planning Department
determined the property is ineligible for listing in the NRHP. The subject property is a two-story plus basement commercial building. It was constructed in 1919 by Oscar Heyman & Brother and was built in the Eclectic Style with French Revival elements. The construction of 4221 Geary Boulevard is consistent with the general development trends of the Richmond District and there is no information to suggest it is individually significant within this context of is associated with any other important events significant in the history of the city, region, state, or nation (Criterion A). Archival research failed to indicate that any of the individuals with a documented association
with the subject property that significant to our past (Criterion B). The property at 4221 Geary Boulevard does not embody the distinctive characteristics of a type, period, or method of construction. It is built in the Eclectic Style with French Revival elements, such as its pent roof. It is not, however, representative of the style and does not possess high artistic values. Constructed by Oscar Heyman & Brother, it does not appear to be a notable or important example of their work (Criterion C). It is unlikely that it has potential to yield information important to our history or prehistory (Criterion D).
4228 Geary Boulevard: San Francisco Planning Department determined the property is ineligible for listing in the NRHP. 4228 Geary Boulevard is a double-volume, single story commercial building. Built in 1912 for James Finch, it has elements of the Mediterranean Revival Style. The construction of 4228 Geary Boulevard is consistent with the general development trends of the Richmond District and there is no information to suggest it is individually significant within this context of is associated with any other important events significant in the history of the city, region, state, or nation (Criterion A). Archival research failed to indicate that any of the individuals with a documented association with the subject
any of the individuals with a documented association with the subject property that significant to our past. The property appears to have had several tenants over the years. The building was constructed as a horse stable and remained as such for about six years. The longest tenant appears to be Herman's Delicatessen which occupied the space for almost 50 years. Though a long-time tenant, archival research failed to indicate that any of the individuals with a documented association with the subject property are significant to our past (Criterion B). The property at 4228 Geary Boulevard does not embody the distinctive characteristics of a type, period, or method of construction (Criterion C). It is unlikely that it has potential to yield information important to our history or prehistory (Criterion D).

TREATMENT OF HISTORIC PROPERTIES (STIPULATION VIII of the PA)
Paragraph F of Stipulation VIII of the PA (New Construction) requires the City to ensure that the design of any new construction is compatible with the historic qualities of the Historic Property, of any historic district or of adjacent historic buildings in terms of size, scale, massing, color, features, and materials and that the design is responsive to the recommended approaches for new construction set forth in the Standards.
The project site is not located in an identified historic district and there are no individual historic structures located on the project site. As discussed above, the architectural APE includes thirteen buildings, all of which were determined ineligible for listing in the NRHP. The Planning Department has determined that the undertaking would have no adverse effect on historic properties (see Attachment C).
CONSIDERATION AND TREATMENT OF ARCHAEOLOGICAL RESOURCES (STIPULATION XI OF PA)
As the responsible agency under the NHPA, MOHCD has determined the APE for archaeological resources based on guidelines contained in the Advisory Council on Historic Preservation's Section 106 Archaeology Guidance. The APE is inclusive of surface and subsurface areas that may be disturbed because of the Proposed Action and alternatives.
In accordance with the Stipulation XI.B of the PA, the City requested that the Northwest Information Center (IC) conduct a records search for the undertaking's APE. The records search, conducted on July 1, 2021, indicated that no previous cultural resource studies have been previously prepared that cover the project area (see Attachment C). The records search of ethnographic literature revealed no Native American resources in the vicinity of the project site.
The IC's review of historical literature and maps indicated a low potential for unrecorded Native American resources in the project area. The review also indicated a high potential for unrecorded historic-period archaeological resources in the project area. Because there is a moderate potential for Native American archeological resources and a moderate potential for historic-period archeological resources to be within the project area, the IC recommended that prior to ground disturbance, a qualified archaeologist conduct further archival and field study to identify archaeological resources, including a good faith effort to identify archaeological deposits that may show no indications on the surface.
In accordance with Stipulation XI.D that if the IC recommends such actions, the City must promptly furnish the SHPO with a copy of the IC's response and request the comments of the SHPO. In August 2021, the City requested the SHPO's comments. On November 22, 2021 SHPO concurred with the IC's recommendation that a professionally qualified archaeologist conduct further archival
research and field study to identify cultural resources (see Attachment C).
Pursuant to 36 CFR 800.6(a)(1), the City invited the ACHP to participate in the consultation process for development of a project-specific programmatic agreement (Agreement) to protect potential

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	archaeological resources. Upon receiving notification and supporting documentation concerning the Proposed Action, ACHP concluded that Council involvement does not apply and thus their participation is not needed in the consultation process (see Attachment C).
	Based on the reasonable presumption that archaeological resources may be present within the project site, MOHCD and the SHPO executed a project-specific Programmatic Agreement on August 18, 2022, that outlines the procedures and methodology that MOHCD will use to avoid any potentially significant adverse effect from the proposed project on potential buried historic properties. The Agreement is included in Attachment C.
	Native American Resources
	The NWIC records search results identified that Native American resources in this part of San Francisco County have been found marginal to the San Francisco Bay and its associated wetlands, and within Holocene age landforms. Because the project site is located approximately 1.25 miles from the historic bay shore margins, the NWIC found a moderate potential for buried unrecorded Native American resources in the project area. The NWIC recommended the lead agency contact local Native American tribe(s).
	The Native American Heritage Commission was contacted on December 1, 2021, to request a record search of the sacred land file. The search failed to indicate the presence of Native American cultural resources in the project APE.
	As recommended by the Native American Heritage Commission, the City contacted representatives of Native American tribes in the Bay Area in December 2021 and February 2022 and asked for them to provide any information they may have on the site. No representatives of Native American tribes have responded to the City.
	Impacts
	Archaeological Resources
	Based on a moderate potential for Native American archaeological resources and a high potential for historic-period archaeological resources to be within the project site, ground-disturbing activity during construction of the project could adversely affect such resources. To avoid any potentially significant adverse effect from the project on buried or submerged historic resources, the MOHCD executed a Project PA with the SHPO (included in Attachment C). With implementation of this Project PA, the proposed action would resolve the potential for substantial adverse effects on archaeological resources.
	Architectural Resources
	The proposed undertaking would not result in adverse effects on historical architectural resources because the project site does not contain architectural historic properties. The proposed undertaking is not located within a known or potential historic district; thus, it would not adversely affect properties considered to be historically significant or eligible to be considered historically significant. Construction activities would be limited to the project site. The

		Planning Department has determined that the undertaking would have no adverse effect upon historic properties.
		Compliance Steps
		The project would be required to comply with the terms of the Agreement Between the City and County of San Francisco and the California State Historic Preservation Officer Regarding 4200 Geary Boulevard Affordable Housing Development, San Francisco, California, August 18, 2022.
		Source List: Attachment C
Noise Abatement	Yes No	Construction Noise
and Control Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B		The project site and adjacent properties to the north, south, west, and east are zoned Geary Boulevard Neighborhood Commercial, and adjacent properties to the northeast are zoned Residential RH-2. Existing land uses in the vicinity provides for a mixture of residential and commercial land uses and developed with multi-family residences and commercial/retail buildings. The sensitive receptors nearest to the project site are the residents located directly adjacent to the project site to the northeast. Construction on the project site could generate temporarily adverse noise audible to existing receptors and residences. The operation of construction equipment and the use of caisson drills to provide structural support for the proposed building could generate noise up to approximately 100 dBA at the nearest sensitive receptors.
		Temporary noise generated by construction equipment would require mitigation, as described below.
		Mitigation Measure
		Construction Noise Reduction. Construction activity would be limited to the period between 7:00 a.m. and 6:00 p.m. on weekdays and to the period 7:00 a.m. to 5:00 p.m. on weekends. Construction outside of these hours would require a permit from the City. Furthermore, construction contractors for development on the project site shall implement appropriate noise reduction measures, as determined by the City during the construction permit approval process. Required noise reduction measures shall be subject to San Francisco Noise Ordinance (Article 29 of the San Francisco Police Code) and may include but are not limited to:
		 Maintaining proper mufflers on equipment; Relocating equipment away from noise-sensitive receptors where possible; and Shutting off idling equipment.
		Community Noise
		Potential adverse effects from community noise that could reasonably result from the proposed development on the project site are analyzed herein.
		The project site's noise environment is dominated by traffic noise from adjacent roadways, primarily Geary Boulevard and general urban activities. The San Francisco city-wide noise map shows Geary Boulevard traffic noise levels between 65.1 and 70.0 dBA (L_{dn}) (normally unacceptable according to HUD standards) on the project site.

To characterize ambient noise levels on-site, Rincon Consultants conducted two short-term (15-minute) measurements on August 17^{th} and one long term (24 hours) measurement on September 8^{th} through 9^{th} , 2021 along Geary Boulevard and 6^{th} Avenue (see Attachment D). The following table shows the average measured noise levels (the L_{eq}).

Table 5. Noise Weasarement Results				
Measurement Location	Primary Noise Source	Leq (dBA)		
1st Floor Elevation, eastern portion of project site	6 th Avenue	62.8		
1st Floor Elevation, southern portion of project site	Geary Boulevard	67.3		

Source: Attachment D.

As shown in the above table, the ambient noise levels at the project site ranged between 62.8 to 67.3 dBA L_{eq} . The long term 24-hour noise measurement resulted in a noise level of 62 dBA L_{dn} .

According to HUD site acceptability standards, exterior noise in the 65-75 dB L_{dn} range is normally unacceptable for residences and requires attenuation measures. The on-site measured Ldn is 62 dBA L_{dn} . Therefore, residents on-site would experience ambient noise levels in HUD's acceptable range.

For comparison with noise measurements on-site, the HUD Site DNL Calculator was run to estimate the traffic-related Day/Night Noise Level (DNL), which is equivalent to L_{dn} (see Attachment D). Estimated average annual daily traffic (AADT) was entered into the DNL calculator, using numbers from the San Francisco Chained Activity Modeling Process (SF-CHAMP). Traffic noise from Geary Boulevard and 6th Avenue, which were observed to be the primary sources of traffic noise during peak hours, were incorporated into the DNL Calculator.

The DNL Calculator estimated that traffic noise from Geary Boulevard (42,320 ADT) would be approximately 70 dBA L_{dn} along the southern property line. The DNL Calculator estimated that traffic noise from 6th Avenue (3,250 ADT) would be approximately 63 dBA L_{dn} along the eastern property line. The modeled 24-hour noise level is similar to the on-site measured 24-hour noise when accounting for distance and shielding provided by the existing on-site building. Noise levels along Geary Boulevard falls within HUD's unacceptable range and noise levels along 6th Avenue falls within HUD's acceptable range.

In addition, traffic associated with project residences would contribute to ambient noise levels experienced by sensitive receptors in the area. The project would not provide vehicle parking spaces and it anticipated that the project would not generate the typical number of vehicle trips as a residential land use. Conservatively analyzed for modeling purposes and based on weekday trip rate of 1.42 trips per dwelling unit from the Institute of Transportation Engineers (ITE), the addition of 98 residential units could generate an estimated 139 average daily trips.

The estimated total of 139 daily trips generated by the project were inputted into the HUD DNL Calculator to determine existing plus project roadway noise levels. All trips generated by the project were
		conservatively assumed to occur on Geary Boulevard. Per the results of the HUD DNL calculator for existing plus project conditions, traffic noise on Geary Boulevard resulted in no traffic noise increases, or 70 dBA L_{dn} . There would be no change to traffic noise along 6 th Avenue. Geary Boulevard operates in HUD's normally unacceptable range. In addition, it is reasonable to assume that the proposed transit-oriented development, being located in the Inner Richmond neighborhood and within walking distance of the San Francisco Municipal Railway light- rail and bus (MUNI) stops, would generate substantially fewer vehicular trips than typical residential developments.
		HUD approval of projects in the normally unacceptable range requires noise mitigation, usually in the form of building designs that provide more than typical noise attenuation. The goal is to reduce interior noise levels to an Ldn or CNEL of 45 dBA inside residential units. This is the same as the California state noise insulation standards for multifamily development. Therefore, noise-reducing measures would be required for residential building design, as described below.
		Mitigation Measure
		Noise Reducing Building Design . On-site residential development shall use building façade materials, acoustic insulation in building walls and ceilings, acoustically rated windows, and similar measures to achieve sufficient reductions from outdoor L_{dn} levels that building interior Ldn noise levels will be 45 dBA or less in the residential portions of the project. All windows and doors at residences must be rated Sound Transmission Class (STC) 28 or higher.
		Source List: 34, 35, 37, Attachment D
Sole Source Aquifers Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149	Yes No	The nearest sole source aquifer is the Santa Margarita Aquifer, located approximately 50 miles south of the project site. Since the project site is not served by a USEPA-designated sole-source aquifer, the proposed action would have no effect on a sole-source aquifer subject to the HUD-USEPA Memorandum of Understanding. Source List: 38
Wetlands Protection	Yes No	There are no wetlands on site. The pearest wetland to the project site is
Executive Order 11990, particularly sections 2 and 5		There are no wetlands on site. The nearest wetland to the project site is Mountain Lake, located approximately 0.5 miles northwest of the site. Mountain Lake is a freshwater pond with adjacent freshwater shrub habitat on its outer banks within the Mountain Lake Park. The proposed action would have no impact on wetlands or other waters of the state.
		Source List: 39
Wild and Scenic Rivers Wild and Scenic Rivers Act of 1968, particularly section	Yes No	The nearest classified Wild and Scenic River is a 23-mile segment of the American River, which is located over 75 miles northeast of the project site. The project would not affect a wild and scenic river and implementation of the project would not conflict with the provisions of the Wild and Scenic Rivers Act. Source List: 40, 41, 42
7(b) and (c)		
ENVIRONMENTAL JUST		1
Environmental Justice	$\begin{array}{cc} \text{Yes} & \text{No} \\ \hline \end{array} \end{array}$	In 2019, 40 percent of the City/County was white, 35 percent was Asian, 15 percent was Hispanic or Latino, 5 percent was Black or African American, 4 percent was two or more races, <1 percent was

Executive Order 12898	Native Hawaiian and Other Pacific Islander, <1 percent was American Indian and Alaska Native, and <1 percent was some other race. This represents a smaller percentage of environmental justice populations than exists nationwide.
	The project site is within U.S. Census Tract 402. In 2019, 56 percent of the Census Tract was white, 32 percent was Asian, 7 percent was Hispanic or Latino, 4 percent was two or more races,1 percent was Black or African American, <1 percent was some other race, 0 percent was Native Hawaiian and Other Pacific Islander, and 0 percent was American Indian and Alaska Native This represents a higher percentage of environmental justice populations than exists in the City/County.
	Within Census Tract 402, an average of 7.4 percent of people were living below the poverty line in 2019 compared to the citywide average of 10.9 percent. 12.4 percent of seniors (aged 65 and over) were living below the poverty line, compared to the citywide average of 13.6 percent. The proposed action would provide 98 new housing units affordable to previously homeless and very low and low-income seniors earning up to 60 percent of the AMI. Residential supportive services would be provided, including a common/community room with kitchen, laundry room, and a supply room. In addition, common space would be provided in the form of a seventh floor terrace, and a seventh floor urban farm garden.
	As discussed above under <i>Clean Air</i> , residents on the project site would not be exposed to substantial health risks related to cancer, acute and chronic hazards, or particulate matter. As discussed throughout this Environmental Assessment, the proposed action would result in no substantial adverse environmental effects, therefore the project would not result in disproportionately high and adverse effects on minority and low-income populations. The proposed action would create new affordable housing opportunities in the City and not create environmental justice concerns. The proposed action would be consistent with Executive Order 12898.
	Source List: 8

Environmental Assessment Factors [24 CFR 58.40; Ref. 40 CFR 1508.8 &1508.27]

Recorded below is the qualitative and quantitative significance of the effects of the proposal on the character, features and resources of the project area. Each factor has been evaluated and documented, as appropriate and in proportion to its relevance to the proposed action. Verifiable source documentation has been provided and described in support of each determination, as appropriate. Credible, traceable and supportive source documentation for each authority has been provided. Where applicable, the necessary reviews or consultations have been completed and applicable permits of approvals have been obtained or noted. Citations, dates/names/titles of contacts, and page references are clear. Additional documentation is attached, as appropriate. All conditions, attenuation or mitigation measures have been clearly identified.

Impact Codes: Use an impact code from the following list to make the determination of impact for each factor.

(1) Minor beneficial impact

- (2) No impact anticipated
- (3) Minor Adverse Impact May require mitigation
- (4) Significant or potentially significant impact requiring avoidance or modification which may require an Environmental Impact Statement

Environmental	Impact	
Assessment Factor	Code	Impact Evaluation
LAND DEVELO Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design	2	The project site is located in the Inner Richmond neighborhood of the Richmond District in San Francisco, California. The site is located in an area primarily composed of residential and commercial land uses and is zoned Neighborhood Commercial District (NCD). NCD and Low Density Residential Mixed-Use (RM-1) zones are located north and south of the project site, respectively.
		Land Use and Zoning
		Permitted Land Uses
		The project site is currently zoned NCD under the San Francisco Planning Code. According to Section 739 of the Planning Code, Geary Boulevard's NCD encourages housing development above the second story, with compatible commercial uses on the ground floor to protect and enhance neighborhoods with mixed use character. The proposed high-density residential project, with commercial components, would be consistent with allowable land uses in the NCD.
		Height and Bulk Designation
		In the NCD, housing density is limited by lot area. Under current zoning, the project site's density is limited to one dwelling unit per 600 square foot lot (a maximum of approximately 27 dwelling units for the 16,750 square foot project site). Although the unit density of the project would be 1 unit per 150 square feet, which would exceed this density, the project would comply with AB 1763 which would allow for form-based density. Under this allowance, the project complies with permitted dwelling unit density.
		The NCD sets general building height limits to 40 feet, with an addition 5-foot height allowance for projects with an active ground-floor use, for a total of 45 feet high. Although the proposed seven-story, 78-foot-tall building would exceed this height limit, the project would comply with AB 1763 which, if approved, would allow for the additional three stories, or 33 feet in height, for a total building height of 78 feet.
		Floor-to-Area Ratio
		Section 124 of the Planning Code sets a floor-to-area ratio (FAR) of 3.6 to one in the Geary Boulevard NCR but does not apply to dwellings. The majority of the project proposes residential uses only.
		Rear Yard Setback
		The NCD requires that a rear yard depth equal to 25 percent of the lot depth, but not less than 15 feet, be provided at levels occupied by dwelling units (Section 134). For the project site, this requirement

		would be equal to approximately 4,162 square feet of rear yard space. The applicant is requesting an allowance under AB 1763 to provide an interior corner rear yard 3,624 square feet in size, 21 percent of the lot size. <i>Open Space</i> Section 135 of the Planning Code requires the provision of 80 sf of private open space per dwelling unit, or 48 100 sf of common open space per dwelling unit. The proposed 98 dwelling units would require 9,800 sf of common open space. The project would include a total of 5,941 sf of common open space. The project would include a total of 5,941 sf of common open space (60 sf per unit) between the interior courtyard space and two, seventh-floor garden terraces. The applicant is requesting an incentive as part of the AB 1763 program to waive or reduce the amount of open space required. <u>Conformance with Plans</u> The project site is not located within any Specific or Area Plans implemented by the City; therefore, there would be no conflict with any existing plans. <u>Visual Consistency</u> The project site is located at the northwest corner of the intersection of Geary Boulevard and 6 th Street. The proposed project's design would be generally consistent with surrounding development but would be built with contemporary design and sustainable materials. The contemporary design of the proposed seven-story building would be compatible with the varying sizes of buildings in the grater Richmond area, which includes a variety of styles and periods of architecture. The proposed building's seven-story height would be taller than those immediately surrounding the site, but not out of place with the intermittent two-to-five story structures in the vicinity. Therefore, the building's scale would be generally consistent with ongoing intensification of building massing on main arterial roadways throughout San Francisco. Setbacks of the proposed project would further reduce the project's massing from vantage points to the north. The project would also be required to comply with the City of San Francisco's
		Richmond area, the proposed action would not result in substantial adverse effects related to scale, visual quality, and urban design.
		Source List: 4, 26, 43, 44, 45, 46, 47
Soil Suitability/ Slope/ Erosion/ Drainage/ Storm Water Runoff	3	The project site is entirely comprised of urban land, according to the U.S. Department of Agriculture's Web Soil Survey. Soils adjacent to the project site have proven sufficiently stable to support existing urban development.
		The site is currently not subject to erosion, as it is fully paved and/or built upon; however, erosion may occur during construction.

		Development on the project site would be subject to the permitting requirement of the San Francisco Department of Building Inspection (DBI) to ensure compliance with applicable laws and regulations. As part of this permitting process, DBI would review the final building plans and require conformance with the provisions of the applicable federal, state, county, and City of San Francisco laws and ordinances. The project site is relatively flat with a gentle slope towards Geary Boulevard and currently paved with asphalt and developed with an existing structure. The proposed project would not have potential hazards related to slope failure and would not create new slopes. Furthermore, the site is not in an erosion-sensitive area (near water, a drainage feature, or on a steep slope). The project site would continue to be fully covered with impervious surfaces, with minimal cutouts for trees and plant material. During construction and operation, the project applicant would be required to comply with all applicable federal and local water quality and wastewater discharge requirements that include compliance with Article 4.1 of the San Francisco Public Works Code, which incorporates and implements the City's National Pollutant Discharge Elimination System (NPDES) permit, and the nine minimum controls of the federal Combined Sewer Overflow Control Policy. The minimum controls include development and implementation of a pollution prevention program and an erosion and sediment control plan that would be reviewed and approved by the City and County of San Francisco Bay. As of 2018, two beaches (Aquatic Park Beach and Crissy Field beach) within the watershed have been listed as "Impaired" with bacteria and other microbe pollutants. Stormwater runoff from the site is affected by topography, drainage,
		and surface cover. The project site is relatively flat and stormwater runoff from the site would enter the City's combined sewer and wastewater system. Prior to stormwater runoff from the proposed building leaving the site, it would be filtered by on-grade landscaping planters and capture systems. With implementation of these stormwater capture systems, development of the site would not result in substantial new sources of off-site stormwater pollution. Removal of the existing parking lot would reduce stormwater pollution from petroleum-based hydrocarbons that can leak from motor vehicles, as well as other trash and other particulates. The project applicant would be required to comply with all aspects of the federal combined sewer system (CSO) Control Policy, and appropriate pre-treatment and pollution prevention programs, which would ensure consistency with existing water quality regulations protecting San Francisco Bay and ocean water quality. Source List: 48, 49
Hazards and	3	Site Safety
Nuisances including Site Safety and Noise		Development of the project site with residential uses would not create a risk of natural hazards, explosion, release of hazardous substances, or other dangers to public health. The project site is located in an urban setting and development on the site would be compatible with

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		surrounding uses. While soil contamination may exist on-site, the implementation of a mitigation measures are required, detailing site-specific procedures to be followed for site remediation which would prevent safety hazards for construction workers and future occupants on-site (see <i>Contamination and Toxic Substances</i>).
		On-site construction would be required to comply with the requirements of the latest California Building Code, which includes compliance with earthquake standards and fire codes and regulations. However, as discussed <i>in Soil Suitability/ Slope/ Erosion/ Drainage/ Storm Water Runoff</i> above, the implementation of a mitigation measure is required, detailing site-specific geotechnical recommendations. Therefore, the proposed action would not have a substantive adverse effect on site safety.
		On-site construction would be required to comply with the requirements of the latest California Building Code, which includes compliance with earthquake standards, fire codes, and regulations. Therefore, the construction and operation of the proposed project would not have a substantial adverse effect on site safety.
		Construction Noise
		As detailed above under <i>Statues, Executive Orders, and Regulations</i> <i>Listed at 24 CFR 50.4 & 58.5, Noise Abatement and Control,</i> construction on the project site could generate temporarily adverse noise audible to existing residences (up to approximately 100 dBA) in the area. Temporary noise generated by construction equipment would require mitigation to limit the hours of construction activity, as described above.
		Community Noise
		As detailed above under heading <i>Statues, Executive Orders, and Regulations Listed at 24 CFR 50.4 & 58.5, Noise Abatement and Control,</i> the proposed action would place new residential units in an area subject to "acceptable" noise levels for residential uses. Pursuant to mitigation listed above, development on-site would be required to use building façade materials, acoustic insulation in building walls and ceilings, acoustically rated windows, and similar measures to achieve sufficient reductions from outdoor Ldn levels that building interior Ldn noise levels would be 45 dBA or less in the residential portions of project.
		Source List: 26, 34, 35, 37, Attachment D, Attachment E
Energy Consumption	2	Residential development on the project site would use energy produced in regional power plants using hydropower and natural gas, oil, coal, and nuclear fuels. On-site development would be required to meet current state and local standards regarding energy consumption, including Title 24 of the California Code of Regulations enforced by the DBI. Beyond compliance with the 2019 San Francisco Green Building Code and Title 24 requirements, the project would be required to achieve GreenPoint Rated status or achieve a status of LEED Silver. To reach the applicable standards, the project would involve the application of green building measures, which are detailed in the project's architectural plan set. Since the project would be required to adhere to 2019 California Green Build Standards and
		required to adhere to 2019 California Green Build Standards, and would include energy reducing design features, the proposed action

Source List: 50
would not result in foreseeable energy inefficiencies and would not have a substantial adverse effect on energy consumption.

Environmental	Impact	
Assessment Factor	Code	Impact Evaluation
SOCIOECONON	IIC	
Employment and Income Patterns	1	Construction of the proposed residential building would not displace existing developments as the structure on site was a funeral home and parking area and is currently vacant. Construction would provide temporary construction work during the length of construction. In addition, the proposed project would include employment opportunities for on-site management, janitorial services, and resident care. Therefore, the proposed action would have a net beneficial effect on employment and income patterns.
		Source List: 26
Demographic	2	Demographic Character Changes
Character Changes, Displacement		The estimated 2021 population of San Francisco is approximately 875,010 persons. The proposed action would result in the establishment of 98 residential units on the project site. The number of anticipated occupants is currently not known at this time, however, based on the development of 98 studio units and assuming a conservative maximum of 2 persons per unit, it is conservatively assumed the project would provide housing for approximately 196 persons. Implementation of the project would incrementally increase the population of San Francisco by approximately 0.02 percent. Based on regional projections provided by the Association of Bay Area Governments (ABAG), the population of San Francisco is expected to increase to 1,136,455 persons by 2040. The population increase resulting from the project would be nominal, approximately 0.07 percent of the forecasted regional increase.
		Displacement
		The project site is currently a vacant funeral home with parking lot. The project is a residential project intended to improve affordable housing stock for previously homeless and very low to low income seniors (up to 45% AMI). The increase in housing opportunity for low income seniors would result in a net positive housing opportunity. Therefore, the project would not result in substantial adverse impacts from displacement of people or businesses.
		Source List: 8, 51, 52

Environmental Assessment Factor	Impact Code	Impact Evaluation
COMMUNITY F	ACILITIE	S AND SERVICES
Educational and Cultural Facilities	2	The San Francisco Unified School District (SFUSD) provides public primary and secondary education in San Francisco. The district is composed of a total of 133 schools, including 12 early education schools, 64 elementary schools (Grades TK-5), eight alternatively configured elementary through middle schools (Grades TK-8), five

		County and Court schools, 13 middle schools (Grades 6–8), three continuation alternative schools, 14 high schools (Grades 9–12), and 14 charter schools. Total enrollment in SFUSD schools, as of January 2021 (without charter enrollment), was 52,965 students. Approximately 15 percent of the population in Census Tract 402 is under the age of 18. Although development on-site could add up to 196 residents (as described under subheading <i>Demographic Character Changes, Displacement</i>), all anticipated residents of the project would be seniors without children, as the 41 of the units would be studio apartments designed only for individuals ages 65+. Regardless, based on Census Tract 402 population statistics, the project could add approximately 9 school-aged children (57 one-bedroom units x 15 percent of population under 18). This increase would not result in substantial adverse effects on local schools relative to existing overall enrollment. In addition, the applicant would be required to pay applicable school impact mitigation fees. Pursuant to Section 65995 (3)(h) of the California Government Code (Senate Bill 50, chaptered August 27, 1998), the payment of statutory fees "is deemed to be full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving, but not limited to, the planning, use, or development of real property, or any change in governmental organization or reorganization." The project site does not contain cultural facilities and the proposed action would not affect existing cultural facilities by its operation. Many cultural facilities are located within walking distance of the project site or accessible from the project site via public transportation and would be available to future project residents. Cultural facilities in the vicinity of the project include the Mini-Museum (0.15 mile southeast), Legion of Honor Museum (2.15 miles southeast), the d Young Museum (0.26 miles east). Cultural facilities within the City are accessible from the project site via publi
Commercial Facilities	2	The project site is within adequate and highly convenient pedestrian or transit access to retail services; several on-street MUNI lines operate within one block of the site, including: 2-Clement, 44-O'Shaughnessy, 38AX- Geary A Express, 38BX-Geary B Express, 38R-MUNI Rapid Bus, and 38-Geary. The MUNI lines run to the central hub of the Civic Center/UN Plaza BART Station, which is located approximately 3.5 miles east and offers transportation throughout the city.
		Supermarkets are located approximately 0.1 mile northwest of the project site on the corner of Clement Street and 8 th Avenue. Three additional markets are all within approximately 0.3 mile of the project site as well. In addition, the project site is located in an area with numerous coffee shops, restaurants, clothing stores, and drugstores within a few blocks site. Therefore, adequate commercial facilities would be accessible to project residents.
Health Care and	2	Source List: 5, 7, 54 A wide array of health care and social services is accessible from the
Social Services	۷.	project site via public transit. The San Francisco Department of Public Health maintains two Divisions - the San Francisco Health Network

		City's health system and San Francisco General Hospital and Rehabilit centers. The Populatio focus on the communi Community Health and and Prevention Branch Additionally, Kaiser Pet has a well-developed in Boulevard and 6 th Street These facilities could be project site. The additional resident burdens on existing hea for new health care fact <i>Changes, Displacemen</i> population by 198 peo level of population inter- substantial change to the	and Prevention. The SF nd has locations through al Hospital Medical C ation Center, and over n Health and Prevention ties of San Francisco and Safety Branch, Commu- t, and the Community H ermanente offers private nedical center on the sou et, approximately 200 fe be accessed via several N ats on the project site wo alth care facilities or cree ilities. As discussed in <i>D</i> <i>at</i> , the project would p ple, which is approximate crease described above ne demographic of the ar in the existing social serve	tout the City including enter, Laguna Honda 15 primary care health in Division has a broad ind is comprised of the unity Health Promotion ealth Services Branch. healthcare services and atheast corner of Geary et from the project site. MUNI stops nearby the uld not result in undue ate substantial demand <i>temographic Character</i> otentially increase the ately 0.02 percent. The would not represent a ea and would not result
Solid Waste Disposal 2 / Recycling		Recology San Francisco, Recology Sunset Scavenger, and Recology Golden Gate provide residential and commercial garbage and recycling services for the City of San Francisco. Solid waste generated by the project (during both construction and operational activities) would be disposed of at one of the cities licensed facilities. The solid waste generated by the project would be adequately served by existing providers with sufficient permitted capacity. During operation, the project could generate an estimated 154 tons of solid waste per year, based on conservative generation rates summarized by CalRecycle for multi-family residential (8.6 pounds/per unit/per day). Table 5 below shows the top five (by tonnage) of the 26 solid waste facilities that process waste from San Francisco.		
		Table 5:	Solid Waste Facilities C	Capacity
		Facility	Max. Daily Throughput (tons)	Remaining Capacity (cubic yards)
		Recology Hay Road	2,400	30,433,000
		Corinda Los Trancos Landfill	3,598	22,180,000
		Altamont Landfill	11,150	65,400,000
		Potrero Hills Landfill	4,330	13,872,000
		Monterey Peninsula Landfill	3,500	49,700,000

		The amount of solid waste generated by the project would represent a small amount compared to the maximum daily throughput of these solid waste facilities and would not exceed facility capacities. Furthermore, pursuant to Section 1402 of the San Francisco Environment Code, the project applicant would be required to submit a waste diversion plan providing for a minimum of 65 percent diversion from landfill of construction and demolition debris. Section 1904 of the San Francisco Environment Code also would require the property manager to supply appropriate containers for recyclable and compostable material. Based on reported citywide diversion rates, it is expected that approximately 80 percent of solid waste generated on-site would be diverted from landfills. Therefore, the proposed action would not substantially increase the demand for solid waste removal service beyond current demand in this area.
		Source List: 56, 57, 58, 59, 60
Waste Water / Sanitary Sewers	2	Wastewater generated at the project site would be treated by the San Francisco Public Utilities Commission (SFPUC), which provides wastewater collection and transfer service in the City. The SFPUC has a combined sewer and wastewater system, which collects sewage and stormwater in the same pipe network. The total volume of wastewater collected in 2015 was approximately 74.3 million gallons per day (mgd). Approximately 65 mgd of the wastewater was treated and discharged from the combined sewer outflow (CSO) to the San Francisco Bay through the Southeast Water Pollution Control Plant (SEWPCP) and to the Pacific Ocean through the Oceanside Water Pollution Control Plant (OWPCP). The CSO is divided into the Bayside and Westside drainage basins, which collect wastewater and stormwater from the east and west sides of the City, respectively. The City currently holds two NPDES permits that cover its wastewater treatment facilities. One permit adopted by the Regional Water Quality Control Board in August 2013 includes the SEWPCP and the CSO discharges to the Bay. Another permit adopted in August 2009 covers the OWPCP, Southwest Ocean Outfall, and Westside Wet Weather Facilities. The permits specify discharge prohibitions, dry-weather effluent limitations, wet-weather effluent performance criteria, receiving water limitations, sludge management practices, and monitoring and reporting requirements. The permits prohibit overflows
		from the CSO structures during dry weather and require wet-weather overflows to comply with the nine minimum controls specified in the
		federal CSO Control Policy.
		The project would result in the development 98 affordable housing units for seniors. Total project wastewater generation is estimated by CalEEMod to be approximately 24,600 gallons per day (9 million gallons divided by 365 days = 24,600 gallons per day). This level of development would not contribute to a citywide increase in sanitary
		flows that could affect CSO discharges because on-site residents would result from redistribution within the City and the proposed action would comply with existing and future regulations and citywide planning efforts. According to the San Francisco Public Utilities Commission Sewer System Master Plan, the City's sewer system has the capacity to
		treat 575 million gallons per day. The wastewater generated by the project would not contribute to a citywide increase in sanitary flows. Development on the project site would be infill in character and would be consistent with the surrounding area, therefore not substantially

		increasing wastewater generation for the general area. Therefore, water quality impacts associated with changes in CSO discharges to San
		Francisco Bay would not be significant for the proposed action.
		Source List: 61, Attachment A
Water Supply	2	Development of the project site with 98 residential units would incrementally increase demand for water. Calculations made using CalEEMod (Attachment A) estimated that the project would demand approximately 14,000 gallons of water per day. Water would be provided to the project by the SFPUC. The 2020 Urban Water Management Plan for the City and County of San Francisco utilizes forecasted growth assumptions for the City and found that water supply for retail customers in the City would meet demand under all drought conditions through the year 2045. Since the project's anticipated population increase is accounted for in City and regional forecasts, associated water demand as a result of the project is within the forecasted supply estimates. Implementation of the proposed action would not have a substantial adverse effect on water supply.
		Source List: 61, Attachment A
Public Safety - Police, Fire and Emergency Medical	2	The project area is served by the San Francisco Police Department and the nearest station is located at 461 6 th Avenue, approximately 450 feet south of the site. The development of residential uses on the project site would incrementally increase demand for police services within the Richmond police district. The services required by the increase in demand would be funded through project-related increases to the city's tax base and would not be substantial given the overall demand for police protection services on a citywide level.
		The project site is served by the San Francisco Fire Department (SFFD). The SFFD headquarters office is located at 441 12 th Avenue, approximately 0.2 miles west of the project site. Additionally, Station 14 and Station 10 are located less than 1.5 miles west and northeast, respectively. Although the project could incrementally increase demand for fire protection services within the project area, the increase would not exceed amounts anticipated under the City's General Plan Housing Element. Additionally, the site is located along established streets within an existing service area and within the 0.5-mile radius threshold established in the Community Facilities Element, ensuring adequate response times would be maintained. The project also would be required to meet SFFD standards for adequate site access and water flow and would comply with current fire suppression building code requirements. Therefore, no substantial adverse effects on fire protection services are expected.
		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. Furthermore, San Francisco ensures fire safety and emergency accessibility within new and existing developments through provisions of its Building and Fire Codes. The project would be required to conform to these standards, which may include development of an emergency procedure manual and an exit drill plan for the proposed development. The project site is adequately served by emergency medical services and the project would not result in a

		significant change to existing emergency medical services already provided in the area.
		Source List: 62, 63
Parks, Open Space and Recreation	2	The proposed action would result in the development of 98 residential units. The project includes the development of a ground-floor open space area as well as two seventh-floor terraces for residents to utilize.
		Several existing community parks surround the project site and would be available for use by project residents. Muriel Leff Mini Park is located approximately one block to the southwest of the project site. A mini park is also located in front of the Richmond/Senator Milton Marks Branch Library, located at 351 9 th Avenue, approximately 0.15 mile from the project site. The San Francisco Parks and Recreation Department also maintains Rossi Park, Pool, and Playground which includes tennis courts, playgrounds, sports fields, and an indoor pool facility on the southeast corner of Arguello Boulevard and Anza Street, approximately 0.35 mile southeast of the project site. As described above, there are sufficient nearby parks, open spaces, and recreation opportunities to serve the project residents. The addition of 98 senior residential units to the neighborhood would not overly burden or otherwise degrade existing parks and open spaces.
		The proposed action would not result in adverse impacts on open spaces or recreational facilities within the city nor would the proposed action place residents in a location devoid of parks or open space.
		Source List: 8, 43, 47
Transportation and	2	Traffic
Accessibility		The proposed action consists of the development of 98 units of affordable housing for seniors. Residential development on the project site would generate vehicle trips on surrounding roadways. However, there are no vehicular parking spaces proposed; therefore, the number of trips generated by the project would likely be substantially less than a typical mid-rise apartment land use. Affordable housing developments typically have lower trip generation than market rate housing, and the site's proximity to transit connections would offer an alternative to car ownership. Conservatively analyzed for modeling purposes and based on weekday trip rate of 1.42 trips per dwelling unit from the Institute of Transportation Engineers (ITE), the addition of 98 residential units could generate an estimated 139 average daily trips. The minor increase in vehicle trips to the site from the proposed project would incrementally increase traffic and congestion in the vicinity but would not substantially adversely affect the local circulation system. A sizeable proportion of residents would make use of the extensive transit opportunities available proximate to the site, including several MUNI rail and bus lines. These rail and bus lines connect to the larger regional BART and Caltrain systems, which provide rail transit to multiple Bay Area counties. Therefore, proposed buildout of the project site would not result in substantial adverse effects on area roadways or intersection operations.
		<i>Transit</i> The project area is well-served by public transit, and several on-street
		MUNI bus lines operate within steps of the site, including 2-Clement,

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	44-O'Shaughnessy, 38AX- Geary A Express, 38BX-Geary B Express, 38R-MUNI Rapid Bus, and 38-Geary.
	Development of the project site may potentially increase transit demand due to new residents on-site, but this additional demand would not noticeably adversely affect transit service but would instead provide additional demand for it. Therefore, the proposed action would not result in substantial adverse effects on transit service.
	Source List: 5, 7, 52
	Pedestrian
	Pedestrian facilities include sidewalks, crosswalks, curb ramps, pedestrian call buttons at intersections, and mixed-use pathways. A 15- foot wide sidewalk currently provides pedestrian access on Geary Boulevard and 6th Street. The project would retain and improve the sidewalks on both Geary Boulevard and 6th Street frontages in accordance with the Better Streets Plan. Based on the anticipated population increase of 196 persons, residents generated by the project would not significantly impact the local transportation network (bicycles, pedestrians, public transit, etc.). Overall, the sidewalks and crosswalks in the area were observed to operate satisfactorily during peak hours, with pedestrians moving at normal walking speeds and with freedom to pass other pedestrians.
	Development of the site with residential uses and ground-floor offices would enhance walkability within the Geary Boulevard and 6 th Street areas and add residential units on a corridor that is well-served by nearby public transit. The proposed action would not result in physical barriers or reduced access or isolate a particular neighborhood or population group; no linear features that would cut off access are proposed, and the project would be contained on one parcel. Furthermore, it would not result in inconvenient or difficult access to local services, facilities and institutions, or other parts of San Francisco.
	The proposed development would generate new pedestrian trips, but these additional trips would not result in unsafe conditions for pedestrians or cause crowding on nearby sidewalks, considering the existing urban setting of the project site. Additionally, the project would replace, and thereby improve, the existing sidewalks along the Geary Boulevard and 6 th Street frontages. Therefore, the proposed action would not result in substantial adverse effects on pedestrian facilities.
	Source List: 7, 31
	Bicycles
	Bicycle facilities generally consist of bicycle lanes, trails, and paths, as well as bike parking, bike lockers, and showers for cyclists. The San Francisco Bicycle Plan, now called the SFMTA Bicycle Strategy, presents a guideline for the City to provide the safe and attractive environment needed to promote bicycling as a transportation mode. As discussed in the 2013 SFMTA Bicycle Strategy, nuances of the City's bicycle network and diverse array of facility types surpasses transportation engineering's traditional hierarchy of Class I, II, and III facilities. Due to this, the Mineta Transportation Institute proposes new

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	methodology to classify road segments on a user-oriented basis, with indicators measured by Levels of Traffic Stress.
	New residential uses on-site would generate new bicycle trips, but these additional trips would not result in unsafe conditions for cyclists. Bicycle parking is required as part of the San Francisco Planning Code. For reference, Class I bike parking spaces are in secure, weather- protected facilities intended for use as long-term, overnight, and work- day bicycle storage by dwelling unit residents, non-residential occupants, and employees. Class II bike parking spaces are bicycle racks located in a publicly-accessible, highly visible location intended for transient or short-term use by visitors, guests, and patrons to the building or use.
	The San Francisco Planning Code, Section 155.2, specifies that new residential buildings must provide one Class I space for every 10 and one Class II bike parking space is required for every 50 residential units as well as one for every 1,500 square feet of retail space. The proposed 98 units and ground floor office spaces would require provision of 10 Class I bike parking spaces and four Class II bike parking spaces. The project proposes to include 12 indoor Class I bike parking spaces and six indoor Class II bike parking spaces as well as six outdoor bike racks. The proposed action would comply with current code and would not result in substantial adverse effects on bicycle facilities.
	Source List: 64, 65
	Loading
	Off-street loading spaces are required in different quantities based on the proposed on-site use, based on the City's Planning Code. Loading activity associated with the project would be related to tenant move-ins and move-outs, garbage pickup, and/or deliveries for the office uses on- site. Development on the project site would be required to comply with Planning Code requirements related to loading spaces.
	Parking
	Development of the site would remove the existing on-site parking lot. Pursuant to Section 151 of the Planning Code, the Geary Boulevard NCD does not require that individual residential buildings provide off- street parking. In addition, San Francisco General Plan policies emphasize the importance of public transit use and discourage facilities that facilitate and encourage automobile uses, such as parking, to minimize the environmental impact of traffic congestion, noise, and air quality associated with unconstrained vehicle use.
	Source List: 44, 66

Environmental Assessment Factor	Impact Code	Impact Evaluation
NATURAL FEAT	ΓURES	
Unique Natural Features, Water Resources	2	The project site is relatively flat and entirely paved. No surface waters (e.g., lakes, rivers, ponds) are located on or adjacent to the project site. The Pacific Ocean is located 1.3 miles northwest of the project site. No unique features are on the site. This project would not affect water resources, nor would it use groundwater resources.

Vegetation, Wildlife	2	As discussed in <i>Water Supply</i> , water service at the project site would be provided by the SFPUC. As discussed in <i>Drainage/Storm Water</i> <i>Runoff</i> , development on the project site would not discharge effluent into surface water or groundwater. Wastewater at the project site would be collected and treated by the combined sewage and stormwater system. Source List: 23, 39, 61 The project site is developed, paved, and lacks major landscaping or vegetation. Furthermore, the site is covered with impervious surfaces. Landscaping, including street trees and planters, is limited to the perimeter of the project site. The project site does not contain any wetland features, vernal pools, riparian habitat, or watercourses. The site is located in the highly urbanized Inner Richmond neighborhood
		of San Francisco, an area lacks habitat able to host wildlife other than birds passing through. Therefore, the development of residential uses on the project site would not have a substantial adverse effect on vegetation or wildlife.
		Source List: 31, 39
Other Factors	2	The project would provide safe living and/or working conditions for residents or occupants by meeting applicable codes for new buildings, fire safety, life safety, and persons with disabilities.
		Greenhouse Gas Emissions
		Construction and operation of the project also would involve the emission of greenhouse gases (GHGs). Of these gases, carbon dioxide (CO_2) and methane (CH_4) are emitted in the greatest quantities from human activities. Emissions of CO_2 are largely by-products of fossil fuel combustion, whereas CH_4 results from off-gassing associated with agricultural practices and landfills. Because GHGs absorb different amounts of heat, a common reference gas (CO_2) is used to relate the amount of heat absorbed to the amount of the gas emissions, referred to as "carbon dioxide equivalent" (CO_2e) , and is the amount of a GHG emitted multiplied by its global warming potential.
		The Council on Environmental Quality (CEQ) rescinded the 2019 <i>Draft NEPA Guidance on Consideration of Greenhouse Gas</i> <i>Emissions</i> and is currently updating the 2016 Guidance on GHG and Climate Change. In the interim, the CEQ encourages all agencies to use available tools resources for evaluating GHG emissions, including the 2016 guidance.
		The 2016 guidance recommends the quantification of a proposed action's projected direct and indirect GHG emissions using available data and GHG quantification tools suitable for the proposed action. When quantifying the GHG emissions is infeasible or tools are not reasonably available then a qualitative analysis is acceptable, but the CEQ cautions against an in-depth analysis because climate change impacts are not attributable to a single action. Instead, it is recommended that the "rule of reason" and the "concept of proportionality" be used instead to evaluate GHG emissions. As described in the guidance, the rule of reason is inherent in NEPA and the CEQ regulations, allowing agencies to determine how to consider an environmental effect and prepare an analysis based on available information and expertise. Under the concept of proportionality,

agencies should discuss impacts in proportion to their potential significance. In addition, when discussing GHG emissions the CEQ guidance allows agencies to include relevant approved federal, regional, state, tribal, or local plans, policies, or laws for GHG emissions to showcase if the proposed action's GHG emissions are consistent with such plans or laws. This approach provides more policy context for GHG emissions. The guidance does not establish a significance threshold or determination level for GHG emissions.
Therefore, the annual GHG emissions generated by the proposed action were quantified using CalEEMod 2020.4.0 and compared to BAAQMD thresholds. Additionally, a qualitative assessment of the proposed action and its consistency with SB 32 was included by comparing the project to CARB's 2017 Scoping Plan. The BAAQMD threshold and CARB 2017 Scoping Plan are to show that GHG emissions are relevant to local and statewide plans that are aiming to reduce GHG emissions in California, which aligns with the national efforts to reduce GHG emissions across the United States.
According to the BAAQMD <i>CEQA Air Quality Guidelines</i> , an efficiency threshold of 4.6 MT CO_2e per service population per year is appropriate for land use projects that include both residential and non-residential land uses. Therefore, this approach is appropriate for the project, which includes residential housing. Although the BAAQMD has not yet quantified a threshold for 2030, a reduction of the 4.6 MT of CO_2e per service population per year threshold by 40 percent to 2.8 MT CO_2e per service population per year would be consistent with the State reduction target established in SB 32. As such, the adjusted service population threshold of 2.8 MT of CO_2e per service population threshold of 2.8 MT of CO_2e per service population threshold of 2.8 MT of CO_2e per service population threshold of 2.8 MT of CO_2e per service population threshold of 2.8 MT of CO_2e per service population threshold of 2.8 MT of CO_2e per service population threshold of 2.8 MT of CO_2e per service population threshold of 2.8 MT of CO_2e per service population threshold for the project.
The amount of CO_2e per year of operation was modeled using CalEEMod with the same project assumptions as for air quality, in addition to the following:
• Year. GHG emissions were modeled in the year 2030 to align with the SB 32 target year.
• Natural Gas: There will be no natural gas infrastructure included in the project building. It would be 100 percent electric. To account for increase in electricity usage, the default CalEEMod natural gas consumption was converted into electricity usage post-model and added to the total energy GHG emissions.
• Service Population. The projects' per person GHG emissions were calculated by dividing total GHG emissions by the projects' service population (residents plus employees). Average household size varies throughout California; therefore, the service population attributed to this project is based on average household size data specific to San Francisco. The average household size in the City of San Francisco is 2.27 persons per. As such, the project would potentially add an estimated 222 residents (98 units x 2.27 persons per unit) to the city.
Project-related construction emissions are confined to a relatively short period in relation to the overall life of the project. Project construction in the year 2030 would result in a total of approximately 430 MT of CO ₂ e. Total project operational GHG emissions are presented in Table 6.

Table 6: Annual G	HG Emissions
Emissions	
Source	(MT CO ₂ e per year)
Area	1
Energy	59
Mobile	339
Waste	23
Water	4
Total	430
Service Population (Residents)	222
Emissions per Service Person	1.9
Adjusted BAAQMD Efficiency Threshold (per Service Person)	2.8
Exceeds Threshold?	No
Note: There are no energy emis Francisco utility provider provider electricity Source: Attachment A	
development would be approximat population year, which would not ex- threshold of 2.8 MT CO ₂ e per service the project would not have a sub emissions and climate change. 2017 Scoping Plan Consistency	ceed the interpolated BAAQMD e population per year. Therefore,
The quantitative goal of SB 32 is t percent below 1990 levels by 2030. 2017 Scoping Plan was created to ou state to achieve the reductions. The that are applicable to the proposed pr use, energy demand, and vehicle mil recycling and diversion from la conservation. The project would be Electric, which would be required to renewable energy sources pursuant project site is also across the street fro Transportation Agency Municipal D Rapid Bus, and 44. Both routes pro routes 38 traveling east and west at south. The projects site is also within commercial and retail uses, a Kaiser p Park. These factors would reduce associated fossil fuel usage. Therefore with the 2017 Scoping Plan and emis	Pursuant to the SB 32 goal, the atline goals and measures for the 2017 Scoping Plan's strategies oject include reducing fossil fuel les traveled (VMT); maximizing ndfills; and increasing water be served by Pacific Gas and o procure more electricity more with the SB 100 targets. The om two San Francisco Municipal Railway stops for lines 38, 38 ovide stops across the city with nd route 44 traveling north and a walking distance of open space, medical center, and Golden Gate e future residents' VMT and e, the project would be consistent
Additionally, these emissions would of the City and County of San Fr Greenhouse Gas Reduction Strateg actions to pursue cleaner energy, e	rancisco. San Francisco's 2017 gy Update identifies the City's

transportation, and solid waste policies, and concludes that the City's policies have resulted in a reduction in GHG emissions below 1990 levels. This is a qualified GHG Reduction Strategy and the project would need to adhere to the mandatory measures in the strategy. Therefore, GHG emissions would be further reduced below those estimated in the Table 6.
Source List: 67, 68, 69, Attachment A

Additional Studies Performed

- Phase I Environmental Site Assessment (ESA), November 18, 2019. Harris and Lee Environmental Services, LLC
- Limited Phase II Environmental Site Assessment (ESA) Soil and Groundwater Sampling, March 5, 2020. Harris and Lee Environmental Services, LLC
- Phase II ESA, February 11, 2021. AEW Engineering, Inc.
- Updated Phase II ESA, April 9, 2021. AEW Engineering, Inc

Field Inspection (Date and completed by): Site visit completed by Leslie Trejo of Rincon Consultants on September 15 & 16, 2021

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List of Sources, Agencies and Persons Consulted [40 CFR 1508.9(b)]:

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ATTACHMENTS

- A. Air Quality and Greenhouse Gas Data and Modeling Results
- B. Phase I, Limited Phase II, and Phase II Environmental Site Assessments

- C. Historic and Cultural Resource Documentation
- D. Sound Level Measurement Data HUD DNL Calculator Results
- E. Community Engagement Plan
- F. Distance to Airports
- G. Health Risk Assessment Modeling Information

List of Permits Obtained: Site Permit, Decommissioning Permit, Demolition Permit (in progress), Temporary Street Space Permit

Public Outreach [24 CFR 50.23 & 58.43]:

A Community Engagement Plan (Plan) was prepared by TNDC (Applicant) in January 2020 to outline engagement with the surrounding community. The Plan is included as Attachment E. As discussed in the Plan, the Applicant has conducted numerous community outreach sessions and meetings to elicit feedback from the community. Sessions with the following groups were held with the corresponding dates:

- Richmond District Rising, Housing Group (2/3/2020)
- Senior Roundtable (2/20/2020)
- Richmond Community Coalition (3/12/2020)
- Richmond District Rising, full group (4/20/2020)
- Planning Association for the Richmond (6/1/2020)
- TNDC Hosted Community Meeting 1 (10/26/2020)
- TNDC Hosted Community Meeting 2, presented in Chinese (11/9/2020)
- TNDC Hosted Community Meeting 3, presented in Russian (11/10/2020)
- TNDC Door Knocking Outreach (11/15/2020)
- Planning Association for the Richmond (5/3/2021)
- San Francisco Richmond District Autumn Moon Festival tabling (9/18/2021)

The applicant also created a project email address, where concerned or interested individuals could direct their inquiries regarding the project. The applicant responded to inquiries in a timely manner and provided additional information when requested. In addition, the applicant published regular updates regarding the project via email and social media throughout the public outreach period.

Cumulative Impact Analysis [24 CFR 58.32]:

The proposed project is a stand-alone action on the project site and is not part of a series of activities. Its development capacity falls within current programmatic plans to develop affordable housing stock in the City that have been adopted by the City and County of San Francisco. It also falls within local and regional projections for population and housing. The environmental and social impacts of potential future development on-site have been evaluated as part of the project. Further cumulative impacts may occur as a result of other planned and pending development in the project site vicinity; however, as discussed in the Clean Air and Transportation and Accessibility sections, the project's air pollutant emissions would not exceed thresholds and the project would generate a nominal number of new vehicle trips. In addition, the project would not contribute to cumulative impacts related to other issues (e.g., soil suitability and hazards.) Therefore, the project would not result in additional cumulative impacts from future related actions.

Alternatives [24 CFR 58.40(e); 40 CFR 1508.9]

Offsite Alternative:

The consideration of an offsite alternative is not warranted because the project would involve development of a residential building on the specific site being studied and no adverse environmental impacts would occur that cannot be mitigated. As a private development project, the project's grant recipient does not own or control other suitable sites that would support similar development as the proposed action.

Reduced Project:

Reducing the number of housing units would provide fewer affordable housing units within the project area. A reduced project with fewer units in a building of lower height and that would accommodate a smaller residential population would have similar environmental impacts as the proposed project, albeit with a slightly lower magnitude. In particular, by decreasing the number of residents on-site, a reduced residential project would reduce impacts associated with land use scale, air quality, traffic, and while noise impacts would be slightly reduced, noise impacts would still require mitigation. Additionally, the Reduced Project Alternative would decrease the number of residents and units, ultimately decreasing the project's financial viability. The Reduced Project Alternative would not support the City's goal of increasing the stock of affordable housing units for low to moderate income persons and seniors since the project would not be maximizing the number of units available to residents.

No Action Alternative [24 CFR 58.40(e)]:

If the proposed action were not implemented, the project site would continue to be an underutilized funeral home with surface parking lot. Because there would be no construction and no operational changes under the No Action Alternative, it would have no new adverse environmental effects. However, the No Action Alternative would not support the City's goals of providing housing opportunities for homeless persons and generally increasing the supply of affordable housing units for seniors.

Summary of Findings and Conclusions:

The project would result in the development of 98 affordable dwelling units for seniors. It would also include one ground floor residential office and amenity space. The project site is bordered by a mix of institutional, commercial, and residential buildings.

The proposed action would not have any potentially significant environmental impacts to the extent that an Environmental Impact Statement would be required. For several environmental issues, the proposed action would result in minor adverse, but mitigable, impacts. In many other environmental issue areas, no adverse impact would occur.

The project site has been identified as having soil contamination present. Disturbance during construction could result in exposure to these contaminants. Therefore, preparation and implementation of a Site Mitigation Plan (SMP) and Health and Safety Plan (HASP) is required to ensure the proper disposal of any soil-based contaminants or hazardous materials, as well as installation of a passive vapor management system.

There is a high potential for unrecorded historic period archaeological resources in the project area and a moderate potential for unrecorded Native American resources in the project area. The Project PA between MOHCD and SHPO would be implemented to avoid any potentially significant adverse effect from the proposed project on buried or submerged historical resources. This agreement includes conditions for an archaeological testing program, archaeological monitoring during construction, a data recovery program if required, protection of any human remains or funerary objects, and a final archaeological report.

Project construction could generate temporary disturbances to nearby residences. Mitigation measures would limit construction to specified hours, with the use of appropriate noise reduction techniques. During project operation, residents on-site could be exposed to unacceptable levels of existing ambient noise. Mitigation measures would be required to incorporate building materials that would reduce interior Ldn noise levels to 45 dBA or less.

For social impacts, the proposed action would benefit previously homeless and low to very-lowincome senior populations in San Francisco by providing affordable housing with supportive services.

For all other issue areas, the proposed action would not result in substantial adverse impacts.

Mitigation Measures and Conditions [40 CFR 1505.2(c)]

Summarize below all mitigation measures adopted by the Responsible Entity to reduce, avoid, or eliminate adverse environmental impacts and to avoid non-compliance or non-conformance with the above-listed authorities and factors. These measures/conditions must be incorporated into project contracts, development agreements, and other relevant documents. The staff responsible for implementing and monitoring mitigation measures should be clearly identified in the mitigation plan.

Law, Authority, or Factor	Mitigation Measures and Conditions
Contamination and Toxic Substances	Regulatory Agency Involvement – SAM. Because there is an open Cleanup Program case (EHB-SAM case #SMED 2009) on the project site, EHB-SAM shall continue to be utilized for agency oversight of assessment and remediation within the project through completion of building demolition, subsurface demolition, and construction of facilities. Additionally, the applicant shall notify the EHB-SAM project manager of the following:
	 Current development plan and any modifications to the development plan Unexpected underground features All former environmental documents completed for the project site
	Upon notification of the information above, EHB-SAM could require actions such as: development of subsurface investigation workplans; completion of soil, soil vapor, and/or groundwater subsurface investigations; installation of soil vapor or groundwater monitoring wells; soil excavation and offsite disposal; completion of human health risk assessments; and/or completion of remediation reports or case closure documents. The project applicant will retain a qualified environmental consultant (Professional Geologist [PG] or

Professional Engineer [PE]) to conduct additional assessment or remediation work as required by EHB-SAM.
If groundwater wells, soil vapor monitoring probes, or sub-slab vapor points are identified during demolition, subsurface demolition, or construction at the project site, they will be abandoned/destroyed by a qualified environmental consultant under permit from the City and County of San Francisco, Department of Public Health – Environmental Health. Demolition activities will be documented in a letter report submitted to EHB-SAM within 60 days of the completion of abandonment activities.
It should also be noted that EHB-SAM may determine that SFBRWQCB or California Department of Toxic Substances Control (DTSC) may be best suited to perform the lead agency duties for assessment and/or remediation at the project site. Should the lead agency be transferred to SFBRWQCB or DTSC, this and other mitigation measures will still apply to these agencies.
Remediation. If soil present within the construction envelope at the development site contains chemicals at concentrations exceeding hazardous waste screening thresholds for contaminants in soil (California Code of Regulations [CCR] Title 22, Section 66261.24), the project applicant will retain a qualified environmental consultant (PG or PE) to conduct additional analytical testing and recommend soil disposal recommendations, or consider other remedial engineering controls, as necessary for the proposed development.
The qualified environmental consultant will utilize the development site analytical results for waste characterization purposes prior to offsite transportation or disposal of potentially impacted soils or other impacted wastes. The qualified environmental consultant will provide disposal recommendations and arrange for proper disposal of the waste soils or other impacted wastes (as necessary), and/or provide recommendations for remedial engineering controls, if appropriate for the proposed development.
The project applicant will review and approve the disposal recommendations prior to transportation of waste soils offsite, and review and approve remedial engineering controls, prior to construction. Remediation of impacted soils and/or implementation of remedial engineering controls may require additional delineation of impacts; additional analytical testing per landfill or recycling facility requirements; soil excavation; and offsite disposal or recycling.
EHB-SAM will review and approve the development site disposal recommendations prior to transportation of waste soils offsite, and review and approve remedial engineering controls, prior to construction.
Site Mitigation Plan (SMP) for Impacted Soils. When requested by SAM, the project applicant will retain a qualified environmental consultant (PG or PE), to prepare a Site Mitigation Plan (SMP) prior to construction. The SMP, or equivalent document, will be prepared to address onsite handling and management of impacted soils or other impacted wastes, and reduce hazards to construction workers and offsite receptors during construction. The plan must establish remedial measures and/or soil management practices to ensure

	construction worker safety, the health of future workers and visitors, and the off-site migration of contaminants from the site. These measures and practices may include, but are not limited to:
	• Stockpile management including stormwater pollution prevention and the installation of Best Management Practices (BMPs)
	Proper disposal procedures of contaminated materials
	 Monitoring and reporting A health and safety plan for contractors working at the site that addresses the safety and health hazards of each phase of site construction activities with the requirements and procedures for employee protection
	The health and safety plan will also outline proper soil handling procedures and health and safety requirements to minimize worker and public exposure to hazardous materials during construction.
	The lead agency and EHB-SAM will review and approve the development SMP for Impacted Soils prior to demolition and grading (construction).
	Vapor Mitigation System Design. If necessary and requested by SAM, the project applicant will retain a qualified environmental consultant (PE) or other qualified person to prepare a sub-slab vapor mitigation system design for the proposed project.
	The sub-slab vapor mitigation system design will likely include the following components to be installed beneath the concrete slab(s) for proposed structures to be constructed as part of redeveloping the site:
	 Sub-slab vent system: Perforated horizontal pipes Vent risers Gravel surrounding perforated horizontal pipes and gravel blanket under impervious membrane (minimum 2-inch
	thickness) • Impervious membrane (which is compatible with VOC vapor)
	Utility trench dams (if applicable)Conduit seals
	The project applicant and EHB-SAM will review and approve the sub-slab vapor mitigation system design prior to construction. Routine sub-slab vapor barrier construction quality assurance inspections will be required during the construction of the sub-slab vapor mitigation system. A certification report prepared by a qualified environmental consultant (PE) will also be required to document the proper installation of the sub-slab vapor mitigation system.
Noise Abatement and Control	Construction Noise Reduction. Construction activity would be limited to the period between 7:00 a.m. and 6:00 p.m. on weekdays and to the period 7:00 a.m. to 5:00 p.m. on weekends. Construction outside of these hours would require a permit from the City. Furthermore, construction contractors for development on the project site shall implement appropriate noise reduction measures, as determined by the City during the construction permit approval process. Required noise reduction measures shall be subject to San

	 Francisco Noise Ordinance (Article 29 of the San Francisco Police Code) and may include: Maintaining proper mufflers on equipment; Relocating equipment away from noise-sensitive receptors where possible; and Shutting off idling equipment. Noise Reducing Building Design. On-site residential development shall use building façade materials, acoustic insulation in building walls and ceilings, acoustically rated windows, and similar measures to achieve sufficient reductions from outdoor L _{dn} levels that building interior Ldn noise levels will be 45 dBA or less in the residential portions of the project. All windows and doors at residences must be rated Sound Transmission Class (STC) 28 or higher.
Historic Preservation	The project would be required to comply with the terms of the Agreement Between the City and County of San Francisco and the California State Historic Preservation Officer Regarding 4200 Geary Boulevard Affordable Housing Development, San Francisco, California, August 18, 2022.

Determination:

\boxtimes	Finding of No Significant Impact [24 CFR 58.40(g)(1); 40 CFR 1508.27]
The	project will not result in a significant impact on the quality of the human environment.

Finding of Significant Impact [24 CFR 58.40(g)(2); 40 CFR 1508.27] The project may significantly affect the quality of the human environment.

Preparer Signature:			Kathoune Heen							Date:	9/13/2022
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Certifying Officer Signat	urÉvic D. Shaw	Date: 9/20/2022
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Name/Title: Eric D. Shaw, Director MOHCD

This original, signed document and related supporting material must be retained on file by the Responsible Entity in an Environmental Review Record (ERR) for the activity/project (ref: 24 CFR Part 58.38) and in accordance with recordkeeping requirements for the HUD program(s).