Environmental Assessment
Determinations and Compliance Findings for HUD-assisted Projects
24 CFR Part 58

Project Information

Project Name: Plaza East Apartments

Responsible Entity: Mayor's Office of Housing and Community Development, City and County of San Francisco

Grant Recipient (if different than Responsible Entity):

State/Local Identifier:

Preparer: Jennifer Wade, Principal Planner, Environmental Science Associates

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

Consultant (if applicable): Environmental Science Associates

Direct Comments to: Because our offices are closed, MOHCD is asking that written comments be submitted via email to eugene.flannery@sfgov.org. If you are unable to access email please send your comments to Eugene T. Flannery at MOHCD, 1 South Van Ness Avenue – 5th Floor, San Francisco, California 94103 or telephone them to 415-701-5598.

Project Location:
1300 Buchanan Street, San Francisco, CA 94115; APNs 0747/001 and 0734/008 (see **Figure 1**).

Description of the Proposed Project [24 CFR 50.12 & 58.32; 40 CFR 1508.25]:
The proposed project would involve demolition of the 193 existing Plaza East apartment units, located at 1300 Buchanan Street in San Francisco, California (Block/Lots 0747/001, 0734/008). The site would be redeveloped, through phased construction, with four 6-story, 65-foot-tall, residential buildings, 69 parking spaces in podium garages, and central open space. Construction is proposed in four phases which would allow for existing residents to remain on-site until they are able to move into newly constructed on-site units. The project would include between 450 and 550 residential units, including at least 193 below-market-rate rental units. The income mix of the remaining units would be determined through the entitlement process and community discussions. For the purposes of the environmental analysis, it is assumed that 550 units would be constructed. (Source Document: 1a)

Since August 2020, the Development team has held a series of monthly resident meetings to discuss existing conditions and the rebuild of Plaza East. With the support of the Resident Council, the Development team will continue to engage with residents through a full redesign charrette for the final design plan.

Statement of Purpose and Need for the Proposal [40 CFR 1508.9(b)]:
The provision of adequate affordable housing remains a significant challenge for San Francisco due to the escalating cost of housing in San Francisco. This continuing trend amplifies the need for providing affordable housing to all household income levels, especially low and very low-income levels.

The California Department of Housing and Community Development (HCD) and Association of Bay Area Governments (ABAG) identified the total housing need for the San Francisco Bay Area for an eight-year period (in this cycle, from 2014 to 2022) and distributed the need among the various jurisdictions. The Regional Housing Need Plan for the San Francisco Bay Area estimates that San Francisco will need an additional 6,234 very low-income (0-50 percent of area median income) units and 4,639 low-income (51-80 percent of area median income) units.

City policies call for increased development of affordable housing in the City. The City's General Plan Housing Element states, "Affordable housing is the most salient housing issue in San Francisco and the Bay Area." Housing Element objectives and policies direct the City to meet that demand.

Section 101.1(b) of the San Francisco Planning Code provides the City's eight Priority Policies, and designates these policies as the basis upon which inconsistencies in the General Plan are resolved, should they occur. Two General Plan Priority Policies relate specifically to housing, and are supported directly by the Housing Element. These are:

- That the City's supply of affordable housing be preserved and enhanced, (see Objectives 1-3, Objectives 7-9, and all related policies under those objectives).

- That existing housing and neighborhood character be conserved and protected in order to preserve the cultural and economic diversity of our neighborhoods, (see Objective 2, Objective 11, and all related policies under those objectives).

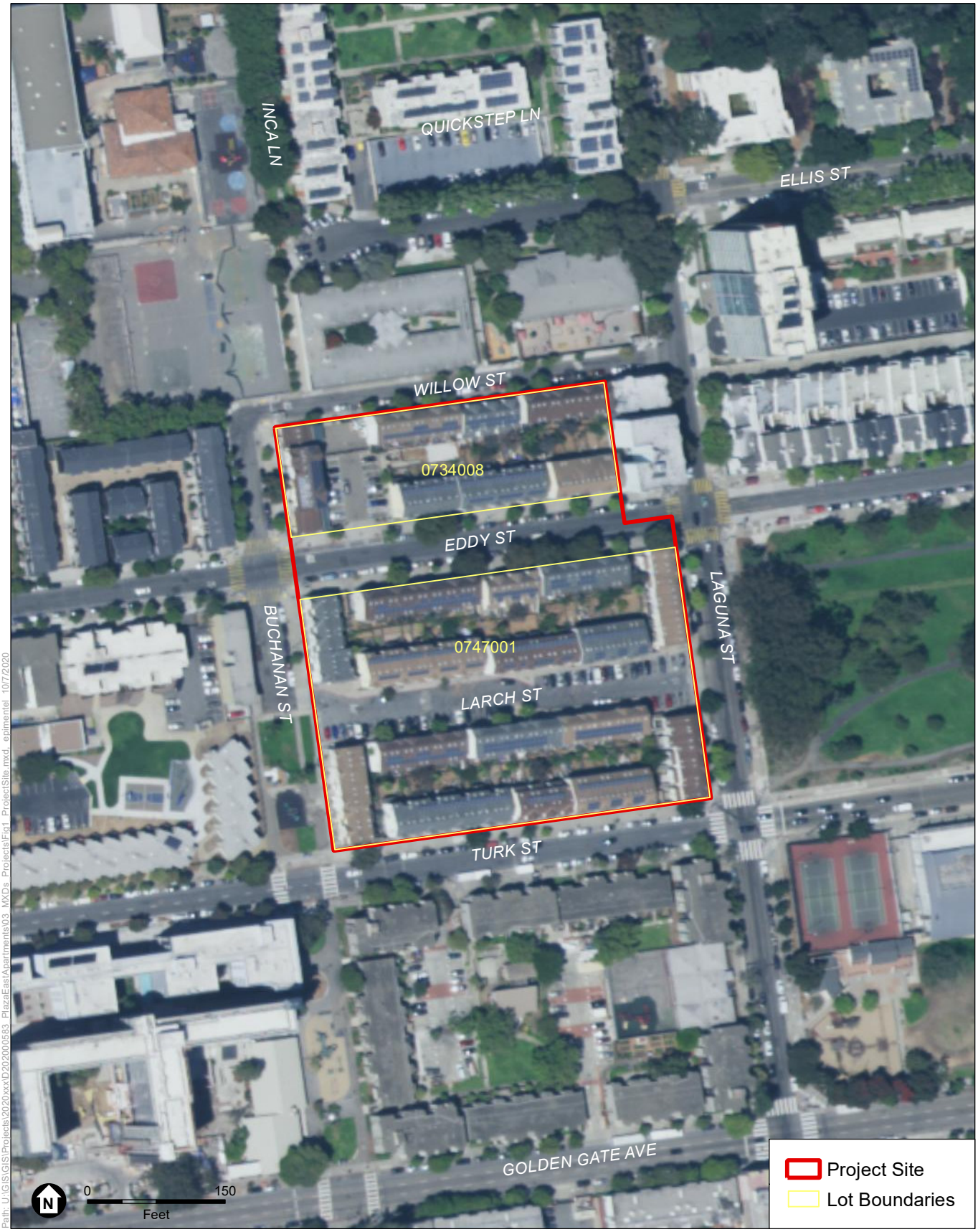
The proposed project would accommodate a portion of the citywide demand for new housing that is near transit, jobs, retail services, cultural institutions, and regional transportation. The proposed project would provide affordable housing in the Western Addition neighborhood. The proposed project would be accessible to various modes of public transit, thereby helping the City meet the objectives of the Housing Element of the General Plan to construct additional residential units in established neighborhoods that will contribute to the City's housing supply.

In 2017, 4,878 new affordable housing units, including very-low, low, and moderate affordable units, were added to San Francisco's housing stock. The proposed project provides at least 193 below-market-rate rental units, which would satisfy a portion of identified affordable housing needs for San Francisco. (Source Document: 1b)

Existing Conditions and Trends [24 CFR 58.40(a)]:
The approximately 4.21-acre rectangular shaped project site is located at 1300 Buchanan Street in San Francisco, California. The existing site contains 22 3-story residential buildings and asphalt parking lots. The buildings contain the leasing offices, a maintenance shop, community center and 193 one- to four-bedroom dwelling units.

The project site is currently zoned as RM-3 by the City of San Francisco. According to Section 209.2 of the Planning Code, RM-3 Districts support smaller structures, predominately devoted to apartment buildings of six, eight, ten or more units, and tend to exceed 40 feet in height, accommodating buildings over this height without disruption of the district character.

The project site is bounded by a preschool and assisted living facility buildings to the north, Jefferson Square Park to the east, and residential and commercial buildings to the south and west. All streets within and adjacent to the project site are fully paved and contain sidewalks, curbs, gutters and street lighting. Areas to the north and east of the project site are zoned as Residential-Mixed, Medium Density (RM-3) and Public (P), areas to the south are zoned as Residential-Mixed, Moderate Density (RM-2), and areas to the west are zoned as RM-2 and Neighborhood Commercial, Shopping Center (NC-S). The property is serviced with all typical urban utilities, including public water and sewer systems, electricity, gas, and telephone service. (Source Document: 1a and 1c).



SOURCE: Esri, 2018; San Francisco Planning Department, 2020; ESA, 2020

Plaza East Apartments Project

Figure 1
Project Site

ESA

Funding Information

Grant Number	HUD Program	Funding Amount
	Project-Based Vouchers	

Estimated Total HUD Funded Amount: Project-Based Vouchers

Estimated Total Project Cost (HUD and non-HUD funds) [24 CFR 58.32(d)]**:**

Construction Costs:	$240,000,000
Non-Construction Costs:	$80,000,000
Total:	$320,000,000

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	Are formal compliance steps or mitigation required?	Compliance determinations
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 and 58.6		
Airport Hazards 24 CFR Part 51 Subpart D	Yes ☐ No ☒	San Francisco International Airport is approximately 11.5 miles south of the project site. The project site is well outside of the boundaries of the San Francisco Airport runway protection zones. The project site is outside all other defined safety zones, airspace protection zones, and Airport Influence Areas of the airport's Comprehensive Land Use Compatibility Plan. Oakland International Airport is approximately 12 miles southeast of the project site. The project site is well outside the boundaries of Oakland Airport runway protection zones and all other defined safety zones. There are no military airfields in San Francisco County or the nearby vicinity; therefore, no military airfield Airport Protection Zone or Clear Zone would affect the proposed project. Source Document(s): 2 and 3
Coastal Barrier Resources Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]	Yes ☐ No ☒	There are no Coastal Barrier Resource System (CBRS) Units, or CBRS buffer zones, as defined under the Coastal Barrier Resources Act of 1982 (PL 97-348), as amended by the Coastal Barrier Improvement Act of 1990 (PL 101-591) located within San Francisco Bay. The project site is therefore not located within a CBRS Unit, or a CBRS buffer zone. Source Document(s): 4
Flood Insurance Flood Disaster Protection Act of 1973 and National	Yes ☐ No ☒	At the time of the preparation of this environmental review, the Federal Emergency Management Agency (FEMA) had not completed a study to determine flood hazards for the project site; therefore, a flood map has not been published at this time and the

Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]		project site is not considered to be within a Special Flood Hazard Area. Based on best-available information that relies upon the FEMA completed preliminary Flood Insurance Rate Map (FIRM) prepared for the City, dated June 2, 2014, the project site is located entirely outside of the 100-year and 500-year floodplain. The project site is not considered to be within a floodplain or Special Flood Hazard Area and is therefore, in compliance with the Flood Insurance Reform Act. Source Document(s): 5 and 6
STATUTES, EXECUTIVE ORDERS, 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 ☒	Criteria Pollutants Construction and operational criteria pollutant emissions were estimated using the California Emissions Estimator Model (CalEEMod), version 2016.3.2. The modeled criteria pollutant emissions were compared to the federal General Conformity *de minimis* levels and local Bay Area Air Quality Management District (BAAQMD) construction and operational thresholds to determine if the project would result in a significant air quality impact. *Comparison to Federal General Conformity De Minimis Levels* Project construction is expected to start in 2023 and would be completed in 4 phases over 5 years. Construction emissions from the project would result primarily from off-road equipment, vehicle use to transport construction workers, material and equipment, and fugitive dust. Results of the CalEEMod run indicate that maximum annual emissions from construction would be approximately: • 2.1 tons per year of reactive organic gases (ROG); • 1.9 tons per year of nitrogen oxides (NO_X); • 2.4 tons per year of carbon monoxide (CO); and • 0.1 tons per year of fine particulate matter of 2.5 microns or less ($PM_{2.5}$). Based on the San Francisco Bay Area Air Basin's designation status as marginal nonattainment for ozone, moderate nonattainment for $PM_{2.5}$, and maintenance for CO, federal *de minimis* levels would be 100 tons per year for each of these pollutants or their precursors (ROG, NO_X, $PM_{2.5}$, and CO). A conformity determination would be required for each criteria pollutant or precursor exceeding the federal General Conformity *de minimis* level. Emissions of ROG, NO_X, $PM_{2.5}$, and CO from

		construction would be below the federal General Conformity *de minimis* levels pursuant to the 1990 amendments to the Federal Clean Air Act. Operational emissions from the project would result primarily from use of consumer products, building energy demand (i.e., natural gas use for space and water heating), and motor vehicle use. Results from CalEEMod indicate that annual emissions from the operation of the project would be approximately: • 1.9 tons per year of ROG; • 0.8 tons per year of NO_X; • 4.4 tons per year of CO; and • 0.2 tons per year of $PM_{2.5}$. Operational emissions would also be below the federal *de minimis* level of 100 tons per year for ROG, NO_X, $PM_{2.5}$, and CO. Therefore, the Proposed Action is exempt from General Conformity regulations. *Comparison to Bay Area Air Quality Management District Thresholds* The modeling results indicate that the average daily emissions from construction, excluding fugitive dust, would be: • 7.2 pounds per day of ROG; • 10.7 pounds per day of NO_X; • 0.4 pound per day of exhaust PM_{10}; and • 0.4 pound per day of exhaust $PM_{2.5}$. The average daily construction emissions would be below the BAAQMD's average daily construction emission thresholds of: • 54 pounds per day of ROG and NOX; • 54 pounds per day of exhaust $PM_{2.5}$; and • 82 pounds per day of exhaust PM_{10}. It is important to note that the BAAQMD only considers exhaust particulate matter in its thresholds of significance and emphasizes implementation of its basic and enhanced construction mitigation control measures to ensure that fugitive dust impacts are reduced to a less than significant level. Results from CalEEMod indicate that maximum annual and average daily emissions from the operation of the project would be: • 1.9 ton per year / 10.4 pounds per day of ROG;

		• 0.8 ton per year / 4.4 pounds per day of NO_X; • 0.8 tons per year / 4.4 pounds per day of total PM_{10}; and • 0.2 tons per year / 1.3 pounds per day of total $PM_{2.5}$. These emissions would be below the BAAQMD's maximum annual and average daily operational emission thresholds of: • 10 tons per year / 54 pounds per day of ROG and NO_X (each); • 10 tons per year / 54 pounds per day of exhaust $PM_{2.5}$; and • 15 tons per year / 82 pounds per day of exhaust PM_{10}. Consequently, criteria pollutant emissions from construction and operation of the project would be less than significant with respect to BAAQMD's thresholds of significance. <u>Fugitive Dust</u> The City's Construction Dust Control Ordinance (Ordinance 176-08, effective July 30, 2008) requires a number of measures to control fugitive dust to ensure that construction projects do not result in visible dust. The project would implement Best Management Practices (BMPs) in compliance with the City's Construction Dust Control Ordinance and BAAQMD recommended control measures for controlling fugitive dust and these BMPs would be effective in controlling construction-related fugitive dust, such that there would be no significant project related impacts. <u>Toxic Air Contaminants (TACs) from Construction</u> TACs are a defined set of pollutants that may pose a present or potential risk to human health. Construction-related activities could result in the generation of TACs, specifically diesel particulate matter (DPM), from diesel-fueled construction equipment and vehicles. Regarding construction emissions, off-road equipment (which includes construction-related equipment) is a large contributor to DPM emissions in California, although since 2007, the Air Resources Board has found the emissions to be substantially lower than previously expected. Newer and more refined emission inventories have substantially lowered the estimates of DPM emissions from off-road equipment such that off-road equipment is now considered the sixth largest source of DPM emissions in California. For example, revised PM emission estimates for the year 2010, of which DPM is a major component of, have decreased by 83 percent from previous 2010 emissions

		estimates for the San Francisco Bay Area Air Basin. Approximately half of the reduction in emissions can be attributed to the economic recession and half to updated methodologies used to better assess construction emissions. Additionally, a number of federal and state regulations are requiring cleaner off-road equipment. Specifically, both the USEPA and California have set emissions standards for new off-road equipment engines, ranging from Tier 1 to Tier 4. Tier 1 emission standards were phased in between 1996 and 2000 and Tier 4 Interim and Final emission standards for all new engines have been phased in between 2008 and 2015. To meet the Tier 4 emission standards, engine manufacturers are required to produce new engines with advanced emission-control technologies. Although the full benefits of these regulations will not be realized for several years, the USEPA estimated that by implementing the federal Tier 4 standards, NO_x and PM emissions will be reduced by more than 90 percent. The BAAQMD recommends the annual thresholds of significance for project operations (10 tons per year for ROG, NOx and $PM_{2.5}$ and 15 tons per year for PM_{10}) be applied to construction. The proposed project would result in variable and temporary generation of TACs from construction equipment well below these thresholds. Results from CALEEMOD indicate that maximum annual emissions from construction would be approximately: • 2.1 tons per year of ROG; • 1.9 tons per year of NO_X; • 0.08 tons per year of PM_{10}; and • 0.08 tons per year of $PM_{2.5}$. Annual construction emissions would be below applicable thresholds and thus the project would not result in significant adverse risks to community health from construction activities. <u>Asbestos Containing Materials and Lead Based Paint</u> Demolition of existing buildings and structures would be subject to BAAQMD Regulation 11, Rule 2, which is intended to limit asbestos emissions from demolition and renovation of structures and the associated disturbance of asbestos-containing waste material generated or handled during these activities. The existing on-site structure, constructed on or before December 31, 1978, would be demolished; thus, demolition shall also comply with Section 3406 of the City of San Francisco's Building Code.

		These regulations would minimize the release of airborne asbestos and lead emissions such that there would be no significant project related impacts. Compliance with this measure, as well as compliance with the Maher Ordinance would reduce the potential for exposure to asbestos containing material. Source Document(s): 7a, 7b, 7c, 7d and attachment
Coastal Zone Management Coastal Zone Management Act, sections 307(c) & (d)	Yes ☐ No ☒	The project site is not located within Coastal Zone Management Area or San Francisco Bay Conservation and Development Commission's area of jurisdiction, which includes the first 100 feet shoreward from the mean high-tide-line around San Francisco Bay; therefore, no formal finding of consistency with commission's San Francisco Bay Plan is required. Source Document(s): 8 and 9
Contamination and Toxic Substances 24 CFR Part 50.3(i) & 58.5(i)(2)	Yes ☒ No ☐	The project site currently contains 22 3-story residential apartment buildings and parking lots. Historical uses and potential hazards for the project site and immediate vicinity were provided by the State Water Resources Control Board GeoTracker, EnviroStor and other databases via an EDR database search, and interviews conducted as part of the Phase I Environmental Site Assessment prepared by SCA Environmental Inc. for this project. <u>Phase I Environmental Site Assessment Findings</u> The environmental database search report found that the project site is listed twice on the databases searched by EDR. The project site is listed on the HIST UST database as having a 3,800-gallon tank installed in 1956 with unknown contents. However, records suggest the tank has been removed and no leaks or subsurface contaminated occurred from the tank. The project site was also listed on the HAZNET database as having "Tank Bottom Waste" and "Unspecific Organic Liquid Materials" materials removed and disposed from the site. However, no violations, spills, or remaining hazardous materials were reported. Additionally, there are several sites within a 0.3-mile radius of the project site with documented leaking USTs, releases, and subsurface contamination, as described in Source Document 10. The proximity of these properties to the project site is of potentially environmental concern with respect to subsurface contamination at the project site.

		A site reconnaissance was performed on October 22, 2019 to observe current conditions throughout the site. Two areas of concern were identified during the site reconnaissance: • Various common hazardous materials are stored inside of the maintenance shop. However, the materials are stored in an orderly manner and no stains were noted. • Minor hydrocarbon staining was observed in the asphalt paved parking areas. However, these stains did not appear to impact surface soil. A corner of the property at the intersection of Eddy and Laguna Streets is listed on the Maher Ordinance Map. The Maher listing likely pertains to the two former USTs on the project site and the industrial facilities formerly located in the Yerba Buena Housing Project. Construction projects within the Maher zone that disturb more than 50 cubic yards of soil require that the project site history (Phase I Environmental Site Assessment) and soil quality be assessed (Phase II Environmental Site Assessment) in accordance with Article 22A of the San Francisco Public Health Code. <u>Conclusion</u> A limited Phase II Environmental Assessment was recommended by the Phase I to characterize subsurface conditions from historical uses of the site and to comply with the Maher Ordinance. The Phase II would characterize the soil depths that would be impacted by development at the project site and evaluate the soil gas conditions. This measure is included as **Mitigation Measure 1: Preparation of a Phase II Environmental Assessment.** Construction related to the project would be required to adhere to Article 22A, and include coordination with the San Francisco the Department of Public Health (SFDPH) to determine if additional measures are required. As the project site was previously redeveloped and proposed excavation is proposed at similar depths to previous disturbance, hazardous soil conditions are not anticipated. Coordination with the SFDPH and implementation of Mitigation Measure 1 would further ensure that construction does not result in adverse effects. Source Document(s): 10a

Endangered Species Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402	Yes ☐ No ☒	The project site currently contains 22, 3-story residential apartment buildings and parking lots and does not support sensitive vegetation and/or wildlife species. No federally listed species or proposed for listing or federally designated critical habitats are documented within the proposed project area. No impacts on federally listed species or critical habitat would occur as the project site is a disturbed and paved, and does not contain critical habitat or other suitable habitat for any federally listed species. Source Document(s): 11, 12, and 13
Explosive and Flammable Hazards 24 CFR Part 51 Subpart C	Yes ☐ No ☒	During the Phase I Environmental Site Assessment, there was no visual evidence during site reconnaissance of unobstructed or unshielded above ground storage tanks (fuel oil, gasoline, propane, etc.) at or immediately adjacent to the project site. The proposed residential uses on-site would not involve explosive or flammable materials or operations and would not be located near sites known to contain toxic or radioactive materials, nor is the project site located near thermal source hazards. The nearest AST to the project site is located at 901 Van Ness Avenue. This tank is approximately 1,823 feet northeast of the project site and has a 1000-gallon capacity. The largest tank within 1 mile of the project site is located at 2030 Van Ness Avenue. The tank is 4,550 feet northeast of the project site and has a 5,000-gallon capacity. A dense network of existing buildings occupies the distance between the tanks and project site. The acceptable separation distance (ASD) for both tanks was calculated using the HUD Acceptable Separation Distance Electronic Assessment Tool (Attachment 3). The ASD for the 901 Van Ness Avenue tank for thermal radiation for people is at least 276.57 feet and for buildings at least 50.25 feet. The ASD for the 2030 Van Ness Avenue tank for thermal radiation for people is at least 540.74 and for buildings at least 105.81 feet. As the project site is over 1,000 feet from both tanks, it is considered to be at an acceptable distance pursuant to 24 CFR Part 51, Subpart C. Source Document(s): 10a, 10b, Attachment 3
Farmlands Protection Farmland Protection Policy Act of 1981,	Yes ☐ No ☒	The project site consists of urban land; therefore, the project would not affect farmlands (PL 97-98, December 22, 1981).

particularly sections 1504(b) and 1541; 7 CFR Part 658		There are no protected farmlands in the City and County of San Francisco. Source Document(s): 14
Floodplain Management Executive Order 11988, particularly section 2(a); 24 CFR Part 55	Yes ☐ No ☒	As addressed under Flood Insurance above, FEMA prepares FIRMs, which identify areas subject to flood inundation, most often from a flood having a one percent chance of occurrence in a given year (also known as a base flood or 100-year flood). FEMA refers to the portion of the floodplain or coastal area that is at risk from floods of this magnitude as a Special Flood Hazard Area. At the time of the preparation of this environmental review, FEMA had not completed a study to determine flood hazard for the project site; therefore, a flood map has not been published at this time. However, HUD requires an EA utilize the best-available information. This best-available information relies upon the FEMA completed preliminary FIRM prepared for the City dated June 2, 2014. Based on this FIRM, the project site is located entirely outside of the 100-year and 500-year floodplain. The project site is not considered to be within a floodplain or Special Flood Hazard Area and is therefore in compliance with the Executive Order 11988. Source Document(s): 5 and 6
Historic Preservation National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800	Yes ☒ No ☐	The Area of Potential Effects (APE) for the proposed project as defined at 36 CFR § 800.16 is limited to the legal lot lines of the property described as 1300 Buchanan Street (APN 0747/001, 0734/008), City and County of San Francisco, California. The City has consulted with the California State Historic Preservation Officer (SHPO) pursuant to the January 2007 Programmatic Agreement by and among the City and County of San Francisco, the California SHPO, and the Advisory Council on Historic Preservation (ACHP) Regarding Historic Properties Affected by Use of Revenue from HUD Part 58 Programs. The following discussion summarizes the process and results of this consultation. MOHCD requested that the Northwest Information Center of the California Historical Resources System at Sonoma State University, Rohnert Park, California (NWIC), conduct a records search for the APE. According to their project-specific sensitivity assessment and records search (NWIC File No.: 16-

		1019), there is a low potential for Native American archeological resources and a high potential for historic-period archeological resources to be within the project APE. The NWIC recommended a qualified archeologist conduct further archival and field study to identify cultural resources, especially a good-faith effort to identify those buried deposits that may show no signs on the surface. The APE does not contain built historic properties or age-eligible built properties. They City has conducted outreach and has actively sought and requested comments and participation of members of the Ohlone/Costanoan Indian tribe and informed the ACHP of potential adverse effects. Due to the potential for encountering subsurface archaeological resources, MOHCD, the SHPO, and the project developer entered into a Site-Specific Programmatic Agreement (PA) in November of 2020. The Site-Specific PA includes measures to avoid adverse effects to buried or submerged historical resources. The terms of the PA include preparation of an Archaeological Testing Program. If a significant archaeological resource is present and could be adversely impacted, the PA requires an Archaeological Data Recovery Program. An Archaeological Monitoring Program may be required as determined by a qualified City Staff Archaeologist and should any archeological resource be discovered, the qualified Archaeological Consultant shall prepare and submit a Draft and Final Archeological Resource Report. Source Document(s): 15
Noise Abatement and Control Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B	Yes ☒ No ☐	The project would intensify the existing land use at the project site and would therefore increase traffic and associated noise levels along roadways in the project vicinity. The project would also introduce additional residential receptors into an urban area exposed to transportation noise. In the short-term, project construction would temporarily increase ambient noise levels at and adjacent to the project site. <u>HUD Noise Standards</u> The acceptable exterior noise level set forth by HUD regulations for new construction of housing is 65 day-night average sound level (DNL) or less. DNL is a 24-hour average noise level with a 10 decibel (dBA) penalty for noise occurring during the nighttime hours, defined as 10 p.m. to 7 a.m. The regulations

		consider the range between 65 dBA DNL and 75 dBA DNL to be normally unacceptable, as long as appropriate sound attenuation measures are provided. A DNL of greater than 75 dBA is considered unacceptable. The HUD DNL Calculator is an assessment tool that calculates the DNL from roadway and railway traffic, as well as from aircraft and loud impulse sounds. ESA modeled noise levels at the project site using the HUD DNL Calculator, which requires assessing noise impacts from roadways up to 1,000 feet away and railways up to 3,000 feet away that could potentially affect noise at the project site. Roadways within 1,000 feet of the project site included in the analysis are Geary Boulevard, Webster Street and Turk Street. Traffic volumes for these roadways were obtained from the San Francisco Municipal Transportation Authority's traffic count data available online. Daily traffic volumes for the roadway segments closest to the project site were averaged over the traffic count measurement period and used in the HUD DNL Calculator to estimate the combined ambient noise level at the project site from these roadway sources. There are no railways located within 3,000 feet of the project site. Two airports are located within the preliminary 15-mile screening distance from the project site. San Francisco International Airport (SFO) is located approximately 10 miles to the south and Oakland International Airport (OAK) is located approximately 11 miles to the southeast of the project site. However, the project site is located several miles outside of the 60 dBA and 65 dBA Community Noise Equivalent Level (CNEL) airport noise contours based on each airport's respective noise contour map. Consequently, the contribution of airport noise from SFO and OAK would not materially contribute to the noise environment at the project site and was not included in the HUD DNL Calculator assessment. The combined DNL exterior noise from these sources was calculated to be 71 dBA DNL at the project buildings along Turk Street. This would fall within HUD's "normally unacceptable" range, which is from 65 to 75 dBA DNL. Since the project site would be exposed to noise levels exceeding 65 dBA DNL, attenuation measures consistent with State and local law would be required to ensure interior noise standards are met. Title 24 of the California Code of Regulations establishes uniform noise insulation standards for multi-family residential

		projects. Multi-family residences must be designed to limit intruding noise to an interior CNEL (or DNL) of at least 45 dBA. The San Francisco Department of Building Inspection (DBI) would review the final building plans to ensure that the building wall and floor/ceiling assemblies meet state standards regarding sound transmission. On-site residential development would include building façade materials, acoustic insulation in buildings walls and ceilings, acoustically rated windows, and similar measures to achieve sufficient reductions from outdoor Ldn levels to ensure building interior Ldn noise levels would be 45 dBA or less in the residential portions of the project. Compliance with this requirement would ensure that interior noise levels of the project residential units would meet the interior noise goal of HUD and the State of California. This is included as **Mitigation Measure 2: Incorporate Noise Reducing Measures into Building Design**. Implementation of Mitigation Measure 2 would ensure that the proposed project does not result in adverse effects related to noise. <u>Construction Noise</u> Project construction would require the use of off-road equipment along with other construction-related noise sources, such as vehicle trips for deliveries and construction workers and would be expected to increase noise levels at surrounding noise sensitive receptors. Construction equipment would consist of excavators, hoe rams, graders, rubber tired dozers, tractors/loaders/ backhoes, cranes, forklifts, generators, pavers, welders and air compressors. The project site is bounded by sensitive land uses including a preschool and assisted living facility buildings to the north, Jefferson Square Park to the east, and residential buildings to the south and west. In addition, the project will be built in phases with existing receptors onsite during construction. Construction noise is regulated by the San Francisco Noise Ordinance (Article 29 of the *Police Code*). The ordinance requires that noise levels from individual pieces of construction equipment, other than impact tools, not exceed 80 dBA at a distance of 100 feet from the source. Impact tools (e.g., jackhammers, hoe rams, impact wrenches) must have manufacturer-recommended and City-approved mufflers for both intake and exhaust. Section 2908 of the Ordinance prohibits construction work between 8:00 p.m. and 7:00 a.m. The project

		would be required to comply with regulations set forth in the Noise Ordinance. Construction at the project site generally would be limited to daytime hours. No pile driving is proposed as part of the project. Construction activities of the project shall comply with the above identified San Francisco Noise Ordinance, and would thus not result in adverse effects. <u>Operational Noise</u> The project site is currently developed with Plaza East Apartment complex that includes 193 low-income residential units which generate vehicle trips to the project site. The proposed project would add 357 additional units and would therefore increase traffic and associated traffic noise on roadway segments in the vicinity of the project. Based on San Francisco County Transportation Authority's Travel Demand Tool available online, the 357 additional residential units would generate 925 daily trips to the project site. As a rule of thumb, when specific data is not available, the peak hour traffic is considered to be approximately 10 percent of the average daily traffic. Therefore, the project would introduce an additional 92 vehicle trips to the surrounding roadway network during the peak hour, which would add to the traffic noise along these roadway segments. Based on traffic data available from the San Francisco Municipal Transportation Authority, addition of project traffic would lead to a less than 10 percent increase in traffic on surrounding streets even assuming that all trips were to use the same roadways to reach the project site. Typically, it takes a doubling of traffic (100 percent increase) to increase associated noise levels by 3 dBA, an increase that would be barely perceivable by the human ear. Therefore, a marginal increase in traffic of less than 10 percent would not increase traffic noise to surrounding uses by levels that would be perceptible. Source Document(s): 16a, 16b, 16c, 16d, 16e, 16f, and attachment
Sole Source Aquifers Safe Drinking Water Act of 1974, as amended, particularly section	Yes ☐ No ☒	The project is not served by a U.S. EPA designated sole-source aquifer, is not located within a sole source aquifer watershed, and would not affect a sole-source aquifer. Source Document(s): 17

1424(e); 40 CFR Part 149		
Wetlands Protection Executive Order 11990, particularly sections 2 and 5	Yes ☐ No ☒	The project site is fully developed and does not contain wetland or riparian resources. Therefore, the project would not affect wetland or riparian areas. Source Document(s): 18
Wild and Scenic Rivers Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)	Yes ☐ No ☒	No federally designated Wild and Scenic Rivers are located within the City and County of San Francisco; therefore, the project would not affect any wild and scenic rivers. Source Document(s): 19
ENVIRONMENTAL JUSTICE		
Environmental Justice Executive Order 12898	Yes ☐ No ☒	For purposes of this analysis, the definitions of minority and low-income populations are based on the Council on Environmental Quality's (CEQ's) Guidance for Agencies on Key Terms in Executive Order 12898. A minority population is present within a study area under either of the following conditions: • The minority population percentage of the affected area is meaningfully greater than the affected area's general population. • The minority population percentage of the affected area exceeds 50 percent. Low-income populations are identified based upon poverty thresholds provided by the U.S. Census Bureau and are identified in one of the following ways (CEQ 1997:25): • The population percentage below the poverty level is meaningfully greater than that of the population percentage in the general population. • The population percentage below the poverty level in the affected area exceeds 50 percent. Within the County of San Francisco, approximately 53 percent of the population is comprised of ethnic minorities and approximately 11 percent of the population has an income below the poverty level. The project site is located in Census Tract 159

		of the 2010 U.S. Census. Within this Tract, approximately 63 percent of the population is comprised of ethnic minorities and approximately 14 percent of the population has an income below the poverty line. As such, the project site is located within a minority population community, as described above. The project would have temporary air quality and noise impacts during construction similar to other construction projects throughout the City. These impacts are not considered disproportionate to any one location and would be reduced to minor or less-than-significant levels with applicable regulations and mitigation. All operational impacts resulting from the proposed project were determined to be minor or less than significant; therefore, the proposed project would not adversely and disproportionately impact minority or low-income populations. The project would provide new housing for low-income individuals. In such a way, it would benefit low-income individuals by providing affordable housing opportunities. Source Document(s): 20, 21, and 22

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 Assessment Factor	Impact Code	Impact Evaluation
LAND DEVELOPMENT		
Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design	3	<u>Conformance with Plans / Compatible Land Use and Zoning</u> The project area contains residential uses with nearby public open spaces. The project site is bounded by a preschool and assisted living facility buildings to the north, Jefferson Square Park to the east, and residential and commercial buildings to the south and west. The project proposes residential development which is compatible with the existing residential uses in the vicinity and the existing use of the site. The project site is currently zoned as RM-3, which according to Section 209.2 of the Planning Code, supports smaller structures, predominately devoted to apartment buildings of six, eight, ten or more units, and tend to exceed 40 feet in height, accommodating buildings over this height without disruption of the district character. This site is in a 50-X height and bulk district, which permits a maximum height of 50 feet and requires no setbacks. The proposed project is not consistent with the existing zoning and height and bulk district; however, the project will be required to obtain entitlements, such as approval of a Planned Unit Development (PUD) or Special Use District (SUD) to allow for development at the proposed height and density. Depending on the income mix of units, density and height

		bonuses may be applicable. In order to ensure consistency with zoning, **Mitigation Measure 3: Obtain Development Entitlements** is included. Areas to the north and east of the project site are zoned as RM-3 and Public, areas to the south are zoned as RM-2, and the area to the west is zoned as RM-2 and NC-S. The proposed residential use of the project is compatible with the surrounding residential mixed and neighborhood commercial uses. The proposed project would not include off-street parking and is consistent with zoning requirements for parking. The City of San Francisco General Plan serves as the overall guiding policy for the economic, social, cultural, and esthetic values within the City of San Francisco. Specifically, the proposed project would be consistent with Housing Element Policies 1.3, 2.1, 4.3, 4.5, 7.6, and 8.1. Overall, the project is compatible with surrounding residential and commercial development and consistent with General Plan policies. Implementation of Mitigation Measure 3 would ensure zoning consistency. <u>Scale and Urban Design</u> The proposed affordable housing apartment buildings would be taller than the immediately adjacent residential and commercial buildings but are consistent with taller heights in the general area. There are several nearby buildings that are 65 feet or more in height, including: the Rosa Parks senior apartments at Turk and Webster Streets (±95 feet tall); the residential building at 1280 Laguna (±125 feet tall); the buildings at 1080 Eddy and 1090 Eddy (each ±85 feet); the building at 1310 Turk (±65 feet); the residential building at 1201 Laguna, at the northwest corner of Eddy and Laguna and on the same block as the northern portion of the project site (approximately ±65 feet tall); and a cluster of buildings near Eddy and Fillmore that are well over 100 feet in height. As such, the project is compatible with the scale and design expectations of the general area and thus would not result in adverse aesthetic effects related to scale and urban design. Source Document(s): 1c, 23
Soil Suitability/ Slope/ Erosion/ Drainage/ Storm Water Runoff	3	<u>Geology and Soils</u> The project site is located in the Coast Ranges Geomorphic Province, which extends along the California coast south to the Transverse Ranges and north to the Oregon border. The province is characterized by northwest-southeast trending mountains and faults sub-parallel to the San Andreas Fault Zone. The province comprises marine and terrestrial sedimentary deposits

		underlain by Salinian Block granitic rocks west of the San Andreas Fault Zone and the Franciscan Assemblage east of the San Andreas Fault Zone. The San Francisco Planning Department's CatEx Determination Layers Map shows that the project site is not within a designated liquefaction, rupture, or landslide hazard zone. The San Francisco Building Code (SFBC) derives from the adopted 2013 California Building Code. This code is administered and enforced by the DBI, and compliance is mandatory for all new development and redevelopment in the City. Throughout the permitting, design, and construction phases of a building project, Planning Department staff, DBI engineers, and DBI building inspectors confirm that the SFBC is being implemented by project architects, engineers, and contractors, including seismic and soil investigations and recommendations. In order to ensure that there are no adverse effects related to geology and soils, a site-specific geotechnical investigation would be conducted, consistent with San Francisco Building Code. This measure is included as **Mitigation Measure 4: Site-Specific Geotechnical Investigation**. The recommendations of the geotechnical investigation shall be incorporated into the project design. <u>Stormwater</u> The project site is currently covered with impermeable surfaces and thus would not result in a net increase in impervious area. Stormwater runoff from project construction would continue to follow the topographic gradient of the site toward the southeast, and drain into storm drains located along the streets, which transport stormwater into the municipal stormwater system. Pursuant to the San Francisco Public Works Code, including the Construction Site Runoff Control Ordinance, and the San Francisco Green Building Code, the project sponsor would be required to implement an Erosion and Sediment Control Plan that sets forth BMPs to reduce potential runoff and erosion impacts. The project would comply with the San Francisco Stormwater Management Ordinance, which requires treatment of all runoff prior to leaving the site. The stormwater management system for the project would collect stormwater within the project site such that the rate and amount of stormwater runoff from the site does not negatively impact the City's treatment facilities, and in a manner that is consistent with the SFPUC's Stormwater Design Guidelines. Adherence to these requirements would ensure that the proposed project would not substantially degrade water quality during either construction or operation. Source Document(s): 10a, 24, 25, and 26

Hazards and Nuisances including Site Safety and Noise	3	<u>Hazardous Materials</u> As discussed in the "Contamination and Toxic Substances" discussion above, historical records and potential hazards for the project site and immediate vicinity were reviewed through a Phase I Environmental Site Assessment. A limited Phase II Environmental Assessment was recommended by the Phase I to characterize subsurface conditions from historical uses of the site and to comply with the Maher Ordinance. This measure is included as **Mitigation Measure 1: Preparation of a Phase II Environmental Assessment.** Construction related to the project would be required to adhere to Article 22A, and include coordination with the San Francisco the Department of Public Health (SFDPH) to determine if additional measures are required. As the project site was previously redeveloped and proposed excavation is proposed at similar depths to previous disturbance, hazardous soil conditions are not anticipated. Coordination with the SFDPH and implementation of Mitigation Measure 1 would further ensure that construction does not result in adverse effects. <u>Noise</u> Construction noise would be temporary and limited to reasonable hours, in compliance with the City's Noise Ordinance. Source Document(s): 10a
Energy Consumption	2	The project would meet current state and local codes concerning energy consumption, including Title 24 of the California Code of Regulation as enforced by the DBI. In addition, San Francisco's Green Building Code places more stringent energy, materials, and construction debris management requirements on new residential buildings than Title 24. New residential buildings are required to achieve at least 75 GreenPoints from the GreenPoints Multi-Family New Construction Checklist, or LEED "Silver" certification. Other than natural gas and coal fuel used to generate the electricity for the project, the project would not have a substantial effect on the use, extraction, or depletion of a natural resource. Source Document(s): 27

Environmental Assessment Factor	Impact Code	Impact Evaluation
SOCIOECONOMIC		
Employment and Income Patterns	2	The project is not anticipated to significantly affect employment opportunities as the primary existing and proposed use of the project site is residential. Construction of the project site would result in temporary, construction job growth at the project site. It is expected that construction work and operational work at the 550-unit apartment complex would be accommodated by the existing employment pool. No adverse impact is anticipated from the project on employment and income within the project area. Source Document(s): N/A
Demographic Character Changes, Displacement	2	<u>Demographics</u> The proposed project would develop four, six-story residential structures on the project site. The project would provide replacement affordable housing as well as additional mixed-income level housing consistent with the needs established in the Regional Housing Need Plan for the San Francisco Bay Area. No adverse demographic changes are anticipated. <u>Displacement</u> The project site currently contains 193 below-market-rate apartment units. Construction is proposed in four phases which would allow for existing residents to remain on-site until they are able to move into newly constructed on-site units, as described in the proposed Relocation Plan. Thus, there would be no impact with respect to displacement. Source Document(s): 28, 43

Environmental Assessment Factor	Impact Code	Impact Evaluation
COMMUNITY FACILITIES AND SERVICES		
Educational and Cultural Facilities	2	The project would not displace educational or cultural facilities. The project area is served by the San Francisco Unified School District (SFUSD). SFUSD assigns students to schools based on a number of factors including parental choice, school capacity, and special program needs; thus, students are not necessarily assigned to the nearest school. SFUSD has conducted long range planning which considers enrollment increases from housing growth through 2040, including below-market-rate units which provide more students than other housing types. It is anticipated that

		a portion of the residents of the project would already be attending a school within San Francisco and thus not new to the District. If all tenants were new to the City, the project would increase population in the City by up to 1,482 residents or by 0.17 percent, which would have an insignificant impact on student enrollment. Additionally, the SFUSD assignment process would prevent a significant burden on any one area school. Therefore, the existing educational facilities are sufficient and there is no new need to construct new facilities to accommodate the proposed project. As such, the project would not be expected to result in significant adverse effects on local schools relative to existing overall enrollment. Source Document(s): 29
Commercial Facilities	1	The nearest grocery store to the project site is Safeway, located approximately 0.1 miles northwest of the project site. Additionally, there are four shopping centers located within two miles of the project site, including 555 Ninth Street Retail Center, Westfield Center, and the City Center. It is anticipated that some occupants would be existing residents of the City; however, if all tenants were new to the City, the population would not increase more than 0.17 percent as a result of the proposed project, which would have an insignificant impact on commercial facilities. Therefore, existing commercial facilities in the area are sufficient and there is no new need to construct new facilities to accommodate the proposed project. Source Document(s): 1a
Health Care and Social Services	2	The project would not impact any health care or social service facilities. The nearest major hospitals are the Saint Francisco Memorial Hospital located approximately 0.8 miles northeast of the project site, and the Kaiser Permanente San Francisco Medical Center, located approximately 2 miles west of the project site. Several social services are located within 2 miles of the project site, including Lutheran Social Services, Human Services Agency of San Francisco and St. Anthony's Social Work Center. Therefore, health care and social services are within a convenient and reasonable distance to residents of the project, and are accessible via public transportation available near the project. It is anticipated that some occupants would be existing residents of the City; however, if all tenants were new to the City, population would not increase more than 0.17 percent as a result of the proposed project, which would have an insignificant impact on existing health care and social services. Therefore, the existing health care and social service facilities are sufficient

		and there is no new need to construct new facilities to accommodate the proposed project. Source Document(s): 1a and 1b
Solid Waste Disposal / Recycling	2	Recology, Inc. provides residential and commercial solid waste collection, recycling, and disposal services for the City of San Francisco. Recyclable materials are taken to Recology's Pier 96 facility, where they are separated into commodities (e.g., aluminum, glass, and paper) and transported to other users for reprocessing. Compostables (e.g., food waste, plant trimmings, soiled paper) are transferred to a Recology composting facility in Solano County, where they are converted to soil amendment and compost. The remaining material is transported to a landfill. In September 2015, San Francisco approved an Agreement with Recology, Inc., for the transport and disposal of the City's municipal solid waste at the Recology Hay Road Landfill in Solano County. The City began disposing of its municipal solid waste at the landfill in January 2016, and is anticipated to continue for approximately nine years, with an option to renew the Agreement thereafter for an additional six years. The landfill is permitted to accept up to 2,400 tons of waste per day, and at this maximum rate of acceptance, the landfill is expected to continue to receive waste approximately through the year 2077. Construction and demolition (C&D) debris in the City must be transported by a registered transporter to a registered facility that can process mixed C&D debris pursuant to the City and County of San Francisco C&D Ordinance. The Ordinance requires that at least 65 percent of C&D debris from a site go to a registered C&D recycling facility. This requirement has been augmented by the Green Building Ordinance, which requires that at least 75 percent of C&D debris be diverted from landfills. Compliance with this regulation would ensure any impact from construction debris is appropriately minimized. During operation, the project would be subject to the City's Mandatory Recycling and Composting Ordinance, which requires the separation of refuse into recyclables, compostables, and trash, thereby minimizing solid waste disposal and maximizing recycling and composting. Although the project would incrementally increase total waste generation from the City by increasing the number of residents at the project site, the increasing rate of diversion through recycling and other methods would result in a decreasing share of total waste that requires deposition into the landfill. Additionally, it is anticipated that some occupants would be existing residents of the City and population would not increase more than 0.17

		percent as a result of the proposed project. Therefore, the existing solid waste disposal facilities are sufficient and there is no new need to construct new facilities to accommodate new residents. Given the size of the project and existing landfill capacity, the project would not be expected to result in significant adverse effects to solid waste services. Source Document(s): 30, 31, and 32
Waste Water / Sanitary Sewers	2	The project site is within an urban area that is well served by the combined sewer/stormwater collection, storage and treatment facilities operated by San Francisco Public Utilities Commission (SFPUC). Wastewater generated at the project site would be treated by SFPUC, which provides wastewater collection and transfer service in the City. The project site is located in the Channel Watershed portion of the Bayside Watershed where wastewater is treated at the Southeast Treatment Plant (SEP). The SEP and two other treatment facilities can treat up to 575 million gallons per day of combined wastewater and stormwater. The San Francisco Sewer System Master Plan addresses anticipated demands through 2030. The system has capacity through 2030 for projected dry weather flows when considering population growth. It is anticipated that some occupants would be existing residents of the City and population would not increase more than 0.17 percent as a result of the proposed project which would have an insignificant impact on wastewater demands. As such, the existing waste water facilities are sufficient and there is no new need to construct new facilities to accommodate new residents. Source Document(s): 33, 34, and 35
Water Supply	2	Water would be provided to the project by SFPUC. SFPUC forecasted future water demand using regional growth projections that incorporate existing land use designations and reasonably foreseeable future projects within San Francisco. According to the 2015 *Urban Water Management Plan for the City and County of San Francisco* (UWMP) and the demand forecasts contained in the *2013 Water Availability Study*, the SFPUC would be able to meet the future demand in years of average precipitation as well as during a single dry year. In a multiple dry year event, SFPUC could experience shortages (1.2% of total demand) in 2040 during years 2 and 3 without development of additional supply concepts. In the *Water Availability Study for the City of San Francisco*, SFPUC estimates an additional 500,000 gallons of water per day is needed to keep

		up with future demand. Since additional water is already planned to be developed for San Francisco to match expected future growth and the project is infill development consistent with the planned use of the site, the water demand from the project is expected to be accommodated by existing and planned supply. It is anticipated that some occupants would be existing residents of the City; however, if all tenants were new to the City, population would not increase more than 0.17 percent as a result of the proposed project, which would have an insignificant impact on water facilities. Therefore, the existing water supply facilities are sufficient and there is no new need to construct new facilities to accommodate the proposed project. Source Information: 33, 36
Public Safety - Police, Fire and Emergency Medical	2	Police service is provided to the project site primarily by the San Francisco Police Department's (SFPD) Northern District Police Station, located at 1125 Fillmore Street (approximately 0.2 miles to the west). Fire protection to the project site is provided primarily by the San Francisco Fire Department's Station 5, located at 1301 Turk Street (approximately 0.1 miles southwest). If one or more of the engine or truck companies were to be out of service at the time of an alarm, the next closest available unit would respond. Emergency medical transportation to San Francisco hospitals is provided by a dynamically deployed fleet of both public and private ambulance services. San Francisco ensures fire safety and emergency accessibility within new and existing developments through provisions of its Building and Fire Codes. Implementation of the project could increase the demand for fire protection, emergency medical and police protection services. However, the increase would be incremental, funded largely through project-related increases to the City's tax base, and would not be substantial given the overall demand for such services on a citywide basis. Fire protection, emergency medical, and police protection resources are regularly redeployed based on need in order to maintain acceptable service ratios. It is anticipated that some occupants would be existing residents of the City; however, if all tenants were new to the City, population would not increase more than 0.17 percent as a result of the proposed project. The current police, fire, and emergency medical facilities are sufficient to address this minimal increase and thus there is no new need to construct new facilities to maintain service levels. As such, the project would not be expected to result in significant adverse effects on public safety. Source Document(s): 37 and 38

Parks, Open Space and Recreation	2	There are several park and recreation facilities and open space within 0.5 miles of the project site, including Jefferson Square Park, James Lang Field, Margaret S. Hayward Playground, all located adjacent to the project site. Additionally, the proposed project will incorporate central open space for use by residents. It is anticipated that some occupants would be existing residents of the City and population would not increase more than 0.17 percent as a result of the proposed project. The current parks, open space and recreational facilities are sufficient and there is no new need to construct new facilities to accommodate the proposed project. Therefore, the project is not anticipated to result in adverse impacts on open spaces or recreational facilities within the City. Source Document(s): 1a
Transportation and Accessibility	2	The project site is adequately served by pedestrian, bicycle, transit, and parking facilities. The closest San Francisco Municipal Transportation Agency (SFMTA) Muni Metro station is the Civic Center Station, approximately 0.75 miles to the east. The closest BART station entrance to the project site is the Civic Center Station, approximately 0.75 miles to the east. In addition, several on-street MUNI bus lines operate within a few blocks of the site: on the corner of Eddy Street and Laguna Street and on the corner of Eddy Street and Buchanan Street. In addition, the San Francisco Ferry Terminal is located approximately 2 miles northeast of the project site and the Cal Train Station is located approximately 1.7 miles east of the project site. The urban roads within 500 feet of the site have a volume of less than 100,000 vehicles per day and thus the project does not meet CARB's recommended threshold for a health risk assessment relating to traffic sources. It is anticipated that some occupants would be existing residents of the City and population would not increase more than 0.17 percent as a result of the proposed project. Therefore, the current transportation facilities are sufficient and there is no new need to construct new facilities to accommodate the proposed project. <u>Vehicle Miles Traveled</u> According to the City's Transportation Information Map, the existing average daily vehicle miles traveled (VMT) per capita for the two transportation analysis zoned (TAZs) in which the project site is located (TAZ 290 and TAZ 680), is between 3.6 and 3.9 for residential uses, which

		is below the existing regional VMT per capita minus 15 percent of 14.6. The proposed project is located within an area of the City where the existing VMT is more than 15 percent below the regional VMT thresholds; therefore, the proposed project would not generate a substantial increase in VMT and is not anticipated to result in adverse impacts related to VMT. Source Document(s): 39, 40, 41, and 42

Environmental Assessment Factor	Impact Code	Impact Evaluation
NATURAL FEATURES		
Unique Natural Features, Water Resources	2	The project site is relatively flat and entirely developed. No known unique natural, or water features are present onsite. Implementation of the project would not affect water resources, nor would it increase demands on groundwater resources. As noted above, water service would be provided by SFPUC. No surface waters (e.g., lakes, rivers, ponds) are located on or adjacent to the project site. Source Document(s): 18, 19, and 36
Vegetation, Wildlife	2	The project site is relatively flat and entirely developed and does not support sensitive vegetation and/or wildlife species. Source Document(s): 11, 12, and 13
Other Factors		NA

Additional Studies Performed:

Field Inspection (Date and completed by)**:** SCA, October 22, 2019 (Phase I Environmental Site Assessment);

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

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Attachments:

1. Air Quality Models
2. DNL Calculator
3. ASD Calculator
4. Site Specific Programmatic Agreement

List of Permits Obtained:

Public Outreach [24 CFR 50.23 & 58.43]:

Since August 2020, the Development team has held a series of monthly resident meetings to discuss existing conditions and the rebuild of Plaza East. With the support of the Resident Council, the Development team will continue to engage with residents through a full redesign charrette for the final design plan.

A notice of availability of the EA and FONSI will be published in the San Francisco Examiner, a local and regional paper of general circulation. The notice of availability and EA will posted on the MOHCD website (https://sfmohcd.org/environmental-reviews).

Cumulative Impact Analysis [24 CFR 58.32]**:**

A cumulative impact is the impact on the environment, which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (federal or non-federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time. No major construction activities or redevelopment are anticipated on adjacent or nearby parcels. The project would not result in adverse impacts for certain issues areas including airport hazards, coastal resources, biological resources, floodplains, agricultural resources, environmental justice, and socioeconomics; thus, the project would not contribute to potentially adverse cumulative impacts for these issues.

For noise, public services and utilities (police, fire, solid waste, water, wastewater, stormwater) and transportation, City-wide resources and thresholds were considered. The Proposed Action does not contribute significantly to these issues on a City-wide basis and impacts would be mitigated by an increased tax base (for public services, utilities and transportation) and by compliance with the San Francisco Noise Ordinance (for noise).

While the project is not consistent with the existing zoning, it is compatible with surrounding development and thus cumulative land use impacts are not anticipated. Further, the project would be required to obtain entitlements from the City prior to construction, which is also includes as Mitigation Measure 3.

Impacts associated with geology and soils, hazardous materials and cultural resources are generally site-specific and not cumulative in nature. The project would comply with federal, state and local regulations, Mitigation Measure 1 (Phase II Environmental Site Assessment), Mitigation Measure 4 (Site-Specific Geotechnical Investigation) and the Site-Specific Programmatic Agreement to ensure that the project's contribution to any cumulative impacts is not significant.

Regarding air quality, the project-specific thresholds take into consideration the entire cumulative air basin and thus are considered indicative of whether a project contributes significantly to a cumulative impact. Project emissions are below applicable thresholds and thus the project would not contribute to potentially adverse cumulative impacts.

In sum, the project would not contribute significantly to an identified cumulative impact.

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

Several alternative size configurations for the project were contemplated. A larger development could have greater impacts on the human environment although they could potentially be mitigated depending on the size of the development. A smaller development would not maximize the potential use of the property and would not avoid additional environmental impacts, as no significant impacts were identified for the proposed project with incorporation of mitigation.

One-for-One Replacement Alternative

A One-for-One Replacement Alternative (Alternative) was considered which would involve demolition of the 193 existing Plaza East apartment units and redevelopment with 193 updated below-market-rate apartments on the project site. This alternative would require temporary off-site relocation of residents but it is assumed that permanent relocation would not be required.

For this Alternative, there would be no adverse impacts related to the following resource areas, as the project site does not contain sensitive resources or hazards related to these areas: airport hazards, coastal resources, biological resources, floodplains, agricultural resources, and explosive/flammable hazards.

The Alternative would maintain the existing level of affordable housing at the project site and would therefore not result in adverse impacts for certain issues which are affected by population/demographic

changes or increased density. These include public services, land use/zoning, transportation, environmental justice, utilities, water resources and socioeconomics.

In comparison to the Proposed Action, the Alternative could have similar impacts for cultural resources, geology and soils, and hazardous materials. Impacts would be dependent on the extent of ground disturbance required for construction. It is likely that redevelopment of housing and associated infrastructure would require disturbance of soils, which were not previously disturbed for the development of the existing Plaza East Apartments. Compliance with the Site-Specific Programmatic Agreement, Mitigation Measure 1 (Phase II Environmental Site Assessment), Mitigation Measure 4 (Site-Specific Geotechnical Investigation), and federal, state and local regulations would ensure that the Alternative does not result in adverse effects.

In comparison to the Proposed Action, air quality impacts (both construction and operational) and noise construction impacts for the Alternative would be reduced in intensity due to the reduced level of development. As the project site would be exposed to noise levels exceeding 65 dBA DNL, attenuation measures consistent with State and local law would be required to ensure interior noise standards for new construction are met. Implementation of Mitigation Measure 2 would ensure that the Alternative does not result in adverse effects related to noise.

In conclusion, the One-for-One Replacement Alternative is not anticipated to result in significant, adverse impacts with the exception of Contamination and Toxic Substances, Cultural Resources, Geology and Soils, and Noise. Compliance with the Site-Specific Programmatic Agreement, Mitigation Measure 1 (Phase II Environmental Site Assessment), Mitigation Measure 2 (Noise Reducing Measures), and Mitigation Measure 4 (Site-Specific Geotechnical Investigation), would reduce impacts related to Contamination and Toxic Substances, Cultural Resources, Geology and Soils, and Noise to less than significant. While some less-than-significant impacts would be further reduced in comparison to the Proposed Action, the One-for-One Replacement Alternative does not best meet the purpose and need to provide additional housing opportunities within the City.

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

The no action alternative would mean that the project site would not be developed with affordable housing and the existing infrastructure would not be demolished. The project site would continue to be used for affordable housing

Summary of Findings and Conclusions:

With applicable laws, authorities, factors or other enforceable measures (e.g. Site-Specific Programmatic Agreement), all potentially significant impacts would be reduced to a less than significant level with the exception of impacts related to Contamination and Toxic Substances, Land Use/Zoning, Geology and Soils, and Noise. Implementation of Mitigation Measures 1 through 4 would reduce impacts related to Contamination and Toxic Substances, Land Use/Zoning, Geology and Soils and Noise to less than significant. As such, no impacts are potentially significant to the extent that an Environmental Impact Statement would be required. The project would result primarily in less than significant impacts to the environment.

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.

Mitigation Measure 1: Preparation of a Phase II Environmental Assessment

Prior to construction, a limited Phase II Environmental Assessment shall be completed at the project site to characterize subsurface conditions from historical uses of the site and to comply with the Maher Ordinance.

Mitigation Measure 2: Incorporation of Noise Reducing Measures into Building Design

The proposed project shall incorporate noise reducing measures into the building design. On-site residential development shall include building façade materials, acoustic insulation in buildings walls and ceilings, acoustically rated windows, and similar measures to achieve sufficient reductions from outdoor Ldn levels to ensure building interior Ldn noise levels would be 45 dBA or less in the residential portions of the project.

Mitigation Measure 3: Obtain Development Entitlements

The proposed project shall obtain approvals from the City to develop at the proposed height and density. This may include approval of a Planned Unit Development (PUD) or Special Use District (SUD) which would amend the Planning Code.

Mitigation Measure 4: Site-Specific Geotechnical Investigation

A site-specific geotechnical investigation shall be prepared and the recommendations of the report shall be incorporated into the project design.

Law, Authority, or Factor	Mitigation Measure
San Francisco Building Code	The San Francisco Building Code derives from the adopted 2013 California Building Code. This code is administered and enforced by the San Francisco DBI, and compliance with all provisions is mandatory for all new development and redevelopment in the City. Throughout the permitting, design, and construction phases of a building project, Planning Department staff, DBI engineers, and DBI building inspectors confirm that the SFBC is being implemented by project architects, engineers, and contractors, including seismic and soil investigations and recommendations.

San Francisco Public Works Code, including the Construction Site Runoff Control Ordinance, and the San Francisco Green Building Code	These codes and ordinances require that the project develop and implement an Erosion and Sediment Control Plan that sets forth BMP measures to reduce potential runoff and erosion impacts.
BAAQMD Regulation 11, Rule 2, Asbestos and Section 3406 of the San Francisco Building Code	Any project demolition which may encounter asbestos must adhere to Regulation 11, Rule 2, which controls emissions of asbestos to the atmosphere during demolition, renovation, milling and manufacturing and establish appropriate waste disposal procedures. Projects constructed on or before December 31, 1978 are subject to additional measures under Section 3406 of the San Francisco Building Code.
Maher Ordinance (San Francisco Maher Ordinance: Article 22A of the San Francisco Health Code and Article 106A.3.4.2 of the San Francisco Building Code)	Disturbance of 50 cubic yards or more of soil within a designated Article 22A area would require coordination with San Francisco Department of Public Health to determine if additional soil investigation is required, including that the project site history (Phase I Environmental Site Assessment) and soil quality be assessed (Phase II Environmental Site Assessment)
San Francisco Construction Dust Control Ordinance (San Francisco Health Code Article 22B, and San Francisco Building Code Section 106.3.2.6)	All site preparation work, demolition, or other construction in San Francisco that could create dust or expose or disturb more than 10 cubic yards or 500 square feet of soil, must comply with specified dust control measures.
San Francisco Noise Ordinance (Article 29 of the Police Code)	The ordinance established acceptable noise levels for construction activities unless a special permit is authorized by the Director of Public Works.
24 CFR Part 51 Subpart B	It is a HUD goal that the interior auditory environment shall not exceed a day-night average sound level of 45 decibels.
Title 24 of the California Code of Regulations	Residences must be designed to limit intruding noise to an interior CNEL (or DNL) of at least 45 decibels.

Determination:

☒ **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: Jennifer Wade Date: 11/24/2020

Name/Title/Organization: Jennifer Wade, Principal Planner, ESA

Certifying Officer Signature: [signature] Date: 11-24-2020

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).