Environmental Assessment
Determinations and Compliance Findings for HUD-assisted Projects

Project Information

Project Name: 500 Turk Development

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: Matthew Long, Senior Environmental Scientist

Certifying Officer Name and Title: Kate Hartley, Director, MOHCD

Consultant (if applicable): Rincon Consultants, Inc.

Direct Comments to: Eugene Flannery, Environmental Compliance Manager, MOHCD
Project Location:

The approximate 0.43-acre project site is located on the northwest corner of Turk Street and Larkin Street (Block 0741, Lot 002) in the Tenderloin neighborhood in San Francisco, California. The site is located in an area primarily composed of residential and commercial land uses. Properties in the vicinity of the site include multi-family residences, miscellaneous commercial buildings, a variety of restaurants, a school, and a Federal Building and U.S. Courthouse.

The site consists of one lot that is currently developed with a one- to two-story, 20- to 30-foot-tall, 7,315 square foot (sf) concrete tire and automobile service building constructed in 1935. The building is L-shaped, with a single story west wing fronting Turk Street and a single story east wing fronting Larkin Street. The two wings meet at the northwest corner, where the building includes a two story component. Figure 1 shows the regional location of the site, and Figure 2 shows its location in the neighborhood.

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

The proposed action would involve demolition of an existing 7,315-sf building and construction of an eight-story residential building with a height of 79 feet at the roofline (excluding four-foot-tall parapets and a 10-foot-tall mechanical penthouse, as permitted under the building code). The project includes 107 affordable dwelling units, one manager's unit, and ground floor commercial space. The total gross building area would be 109,031 sf, with approximately 2,600 square-feet of ground floor commercial space, 3,600 sf of ground floor common space and residential support services, such as a community room, laundry room, community kitchen and a supply room, and approximately 5,240 sf of ground floor common open space, including an outdoor courtyard, play area, and plaza.

Approximately 150 Class 1 and 10 Class 2 bicycle parking spaces would be included in the project. No vehicular parking spaces would be provided. The project would serve families that earn up to 60 percent of the San Francisco area median income (AMI).

The residential units would include 23 studio units, 21 one-bedroom units, 50 two-bedroom units, and 14 three-bedroom units. A total of 107 of the 108 units would be affordable to households that earn up to 60 percent of the AMI, with one unit for the on-site building manager.

Table 1 summarizes the basic project components.
<table>
<thead>
<tr>
<th>Use</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Residential</td>
<td>82,203 sf</td>
</tr>
<tr>
<td>Common</td>
<td>4,584 sf</td>
</tr>
<tr>
<td>Retail</td>
<td>2,893 sf</td>
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<tr>
<td>Circulation</td>
<td>15,796 sf</td>
</tr>
<tr>
<td>Service</td>
<td>3,455 sf</td>
</tr>
<tr>
<td>Gross Floor Area</td>
<td>109,031 sf</td>
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<tr>
<td>Open Space</td>
<td>5,240 sf</td>
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<tr>
<td>Number of Dwelling Units</td>
<td>108 Units</td>
</tr>
<tr>
<td>Vehicle Parking Spaces</td>
<td>10 On Street (5 Net New)</td>
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<tr>
<td>Bicycle Parking Spaces</td>
<td>110 Class I and 12 Class II</td>
</tr>
<tr>
<td>Height of Building</td>
<td>79 Feet*</td>
</tr>
<tr>
<td>Number of Stories</td>
<td>8</td>
</tr>
</tbody>
</table>

* Excluding 4-foot-tall parapets and a 10-foot-tall mechanical penthouse, as permitted under planning code
Figure 1  Regional Project Location
Figure 2  Project Site Vicinity
The proposed building would be L-shaped and oriented around an internal courtyard, with one wing facing Turk Street and the other on Larkin Street. The internal courtyard would be located at the northwest corner of the site, including a children’s play area and landscaped plaza. In addition, 14 trees would be planted along the Turk and Larkin Street frontages.

The applicant, Tenderloin Neighborhood Development Corporation (TNDC), is requesting the following approvals from the City of San Francisco:

- Exception to the requirement in Section 134 of the Planning Code that the 25 percent rear yard does not span the full width of the lot;
- Variances (pursuant to Sections 135 and 140) to provide less horizontal dimensions than required due to site constraints.

**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 72,530 new units to its total housing supply by the year 2030.

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

In addition, the City’s policies include promotion of mixed-use affordable housing. Policy 1.8 promotes “mixed use development, and include housing, particularly affordable housing, in new commercial, institutional or other single use development projects”.

The 500 Turk Street project is designed to meet these policies by providing 100 percent affordable apartments and family supportive services in the Tenderloin neighborhood. The provision of 107 affordable housing units would accommodate a portion of the ABAG-project demand for affordable housing. Furthermore, the proposed action would provide affordable housing in an area that is well-served by public transit, including the Civic Center/UN Plaza Bay Area Rapid Transit (BART) Station and San Francisco Municipal Railway (MUNI), and near jobs, retail services, and cultural institutions. In this location the addition of residents and ground-floor retail services would bolster efforts to revitalize the Tenderloin area. Additionally, the proposed action is intended to support the City’s goals of ending chronic homelessness and increasing the availability of affordable housing units specifically for families.

**Sources:** 1, 2
Existing Conditions and Trends [24 CFR 58.40(a)]:

As shown in Figure 3, the project site is located in the Residential-Commercial, High Density Zoning District (RC-4), which covers a large portion of the Tenderloin neighborhood. The RC-4 District provides for a mixture of high-density dwellings, similar to those in RM-4 Districts (high density apartments) with supporting commercial uses. The compact, walkable, transit-oriented and mixed-use nature of the residential-commercial (RC) Districts is recognized by no off-street parking requirements. Under current zoning, the site’s utilization is limited by its Height and Bulk designation (80-T). Currently, the maximum allowable height is 80 feet, which is lower than the 130-foot height limit to the south and west.
Figure 3  Project Vicinity Zoning Map
The rectangular, 0.43-acre project site is currently used as for tire and automotive services (see Photos 1 and 2 in Figure 4). The project site is covered with impermeable hardscape with relatively flat topography that slopes gently downward from the northern portion of the site towards Turk Street. The site and surrounding street frontages lack vegetation. Outside the northeastern property line, several street trees grow on the sidewalk along Larkin Street.

The site can be temporarily enclosed on the southern and eastern sides with a chain and post removable fencing, and has chain-link fencing along eastern side of the north side parking lot, adjacent to Larkin Street. There are two entrances, one on Larkin Street, and one on Turk Street, which allows access to the open area at the frontages that is used for vehicle parking. The western boundary of the site is bordered by a parking lot, while the northern boundary is bordered by the two-story Phoenix Hotel and parking lot.

A mix of institutional, commercial, and residential buildings and open space (parking lot) surround the project site, as shown by the photos of nearby uses in Figure 5. Six-story residential buildings with commercial establishments on the ground floor are to the east; the aforementioned Phoenix Hotel is to the north; an approximate 45-stall public parking lot, which includes three Zip-Car stalls, and Enterprise Rent-a-Car is to the west; and the 21-story Phillip Burton Federal Building is to the south.

The project site and surrounding properties in the Tenderloin neighborhood are situated in the Downtown/Civic Center area of the City of San Francisco, which is generally bounded by Market Street to the south, Gough Street, Ellis Street, and Van Ness Avenue to the west, Bush Street to the north, and Stockton Street to the east.

The project site is well-served by public transit. Three blocks south of the project site, the Civic Center/UN Plaza Station provides both BART and MUNI service. BART provides high-speed, high-frequency service to downtown San Francisco, the San Francisco International Airport, and the East Bay. Due to the Civic Center/UN Plaza Station’s proximity to downtown San Francisco, it is one of the busiest BART stations in the entire transit system. All six MUNI subway lines stop at the Civic Center/UN Plaza Station. In addition, several on-street MUNI bus lines operate within a several blocks of the site: 7X-Noriega Express, 31-Balboa, 27-Bryant, 47-Van Ness, 49-Van Ness/Mission, 21-Hayes, 38-Geary, 9R-San Bruno Rapid, J-Church, K-Owl, L-Taraval, M-Ocean View, N-Judah, T-Owl, 14R-Mission Rapid, and 9-San Bruno. Also, the following Golden Gate Transit and SamTrans bus lines provide service from Mission Street and Van Ness Avenue to the North Bay and South Bay, respectively:

- Golden Gate 101 (Santa Rosa)
- Golden Gate 101X (Santa Rosa – Express)
- Golden Gate 70 (Novato)
- Golden Gate 30 (San Rafael)
- SamTrans 292 (Hillsdale Mall);
- SamTrans KX (Redwood City Transit Center); and
- SamTrans 397 (Palo Alto Transit Center)

The project site is located within U.S. Census Tract 124.02, which is bounded by Market Street to the south, Van Ness Avenue to the west, Larkin Street and Leavenworth Street to the east, and Ellis Street and Golden Gate Avenue to the north.

Sources: 3, 4, 5, 6
Figure 4  Site Photos

Photo 1: View of on-site building looking north from Turk Street.

Photo 2: View of on-site parking lot, looking north.
Figure 5  Site Vicinity Photos

Photo 1: View of the intersection of Turk and Larkin Streets, as viewed from the project site. Looking southeast.

Photo 2: View of the residential building across from Larkin Street, as viewed from the project site. Looking east.
According to the 2015 U.S. Census American Community Survey (ACS), this area has a population of 3,600 with an average household size of 1.5 people. Relative to the County’s average household size of 2.3, as of 2015, households in Census Tract 124.02 are about 35 percent smaller.

The median annual household income of Census Tract 124.02, based on the 2015 ACS, is $38,333. The estimated median income in this area is approximately half of that of the entire County of San Francisco ($81,294).

San Francisco is one of the nation’s most expensive cities. According to the Paragon Real Estate Group’s Housing Affordability in the San Francisco Bay Area report, the average rent in San Francisco in 2017 had increased by approximately nine percent from three years earlier, and that home prices, for single-family homes, are up approximately 86 percent in the post-recession period since 2011. The Downtown planning district had a housing stock of 30,077 units, as of 2013. The majority of these (94 percent) were part of multi-family apartments with at least 10 units.

The Mayor has implemented a plan 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. The plan includes 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: 1, 7, 8,

**Funding Information**

<table>
<thead>
<tr>
<th>Grant Number</th>
<th>HUD Program</th>
<th>Funding Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Project Based Vouchers</td>
<td>27 Vouchers</td>
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</table>

Estimated Total HUD Funded Amount: 27 Vouchers

Estimated Total Project Cost (HUD and non-HUD funds) [24 CFR 58.32(d)]: $75,000,000
### 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.

<table>
<thead>
<tr>
<th>Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6</th>
<th>Are formal compliance steps or mitigation required?</th>
<th>Compliance determinations</th>
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#### STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 and 58.6

<table>
<thead>
<tr>
<th>Airport Hazards</th>
<th>Yes</th>
<th>No</th>
<th>The nearest civil airports to the site are the San Francisco International Airport, and the Oakland International Airport. Both airports are located approximately 11 miles away, to the south and east, respectively. No military airfields are within San Francisco or the vicinity. The project site is not within either airports’ influence areas, and the site is not located in a civilian airport runway clear/potential zone. The project site is not within either the San Francisco or Oakland airport-related building height referral area. The proposed action would not result in a significant airport-related safety hazard.</th>
</tr>
</thead>
<tbody>
<tr>
<td>24 CFR Part 51 Subpart D</td>
<td>☑</td>
<td>☑</td>
<td>Source List: 9, 10</td>
</tr>
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</table>

| Coastal Barrier Resources | 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. In 2000, the U.S. Fish and Wildlife Service (USFWS) reported to Congress on the inclusion of Pacific Coast coastal barriers in the CBRS. Coastal barriers include barrier islands, bars, spits, and tombolos, along with associated aquatic habitats, such as adjacent estuaries and wetlands. If some portion of a barrier landform is developed, the remaining undeveloped portion may be included in the CBRS. The Department of the Interior, through USFWS, is the primary authority in the implementation of this act and may approve subsidies for such uses as emergency assistance. In 2000, USFWS did not recommend inclusion of Pacific Coast coastal barriers within the CBRS, and Congress has not subsequently |
| Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501] | ☑ | ☑ | |

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amended CBRA to include these barriers. 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:** 11, 12

<table>
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<tr>
<th>Flood Insurance</th>
<th>Yes</th>
<th>No</th>
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<tbody>
<tr>
<td>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 Floodplain Map prepared for the City of San Francisco in November 2015. Therefore flood insurance purchase is voluntary. The proposed action would not conflict with the Flood Disaster Protection Act or National Flood Insurance Reform Act.</td>
<td></td>
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<tr>
<td><strong>Source List:</strong> 13, 14</td>
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</table>

**STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 & 58.5**

<table>
<thead>
<tr>
<th>Clean Air</th>
<th>Yes</th>
<th>No</th>
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</thead>
<tbody>
<tr>
<td>Clean Air Act, as amended, particularly section 176(c) &amp; (d); 40 CFR Parts 6, 51, 93</td>
<td>☐</td>
<td>☑️</td>
</tr>
<tr>
<td>The federal Clean Air Act (CAA) requires each state to identify areas that have ambient air quality in violation of federal standards. States are required to develop, adopt, and implement a State Implementation Plan (SIP) to achieve, maintain, and enforce federal ambient air quality standards in these nonattainment areas. SIP elements are developed on a pollutant-by-pollutant basis whenever one or more air quality standards are being violated. In California, local and regional air pollution control agencies have primary responsibility for developing SIPs, generally in coordination with local and regional land use and transportation planning agencies. The 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 U.S. 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. 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</td>
<td></td>
<td></td>
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</table>
data are lacking. Unclassified areas are treated as attainment areas for most regulatory purposes. Simple attainment designations generally are used only for areas that transition from nonattainment status to attainment status. Areas that have been reclassified from nonattainment to attainment of federal air quality standards are automatically considered maintenance areas, although this designation is seldom noted in status listings. The San Francisco Bay Area is designated as nonattainment for the federal 8-hour ozone standard and particulate matter less than 2.5 microns in diameter (PM$_{2.5}$). The San Francisco Bay Area is also a maintenance area for the federal carbon monoxide (CO) standards. The Bay Area is designated as attainment or unclassified for the other federal ambient air quality standards.

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 and Operational Emissions**

CAA conformity thresholds applicable in the San Francisco Bay Area are 100 tons per year of reactive organic gases (ROG), 100 tons per year of nitrogen oxides (NO$_x$), 100 tons per year of PM$_{10}$ and PM$_{2.5}$, and 100 tons per year of carbon monoxide (CO) (40 CFR §93.153).

The most recent applicable thresholds of the BAAQMD 2017 CEQA Air Quality Guidelines for project-level operational emissions are 10 tons per year (tpy) of ROG, 10 tpy of NO$_x$, 15 tpy of PM$_{10}$, and 10 tpy of PM$_{2.5}$. Daily operational emissions thresholds are not to exceed 54 pounds per day (lb/day) of ROG, 54 lb/day of NO$_x$, 82 lb/day of PM$_{10}$, and 54 lb/day of PM$_{2.5}$.

For construction, BAAQMD 2017 CEQA Air Quality Guidelines include average daily emissions thresholds of 54 lb/day of ROG, 54 lb/day of NO$_x$, 82 lb/day of PM$_{10}$ (exhaust), and 54 lb/day of PM$_{2.5}$ (exhaust). BAAQMD thresholds of significance for construction and operational emissions are shown in the table below.

**Table 2: BAAQMD Thresholds of Significance for Air Pollutants**

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Construction</th>
<th>Operational</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Avg. daily emissions (lb/day)</td>
<td>Avg. daily emissions (lb/day)</td>
</tr>
<tr>
<td>ROG</td>
<td>54</td>
<td>54</td>
</tr>
<tr>
<td>NO$_x$</td>
<td>54</td>
<td>54</td>
</tr>
<tr>
<td>PM$_{10}$</td>
<td>82 (exhaust)</td>
<td>82</td>
</tr>
<tr>
<td>PM$_{2.5}$</td>
<td>54 (exhaust)</td>
<td>54</td>
</tr>
<tr>
<td>-----------</td>
<td>--------------</td>
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</table>

*Source: BAAQMD 2017 CEQA Air Quality Guidelines.*

For construction activities, the San Francisco Dust Control Ordinance (Ordinance 176-08) would reduce the quantity of dust generated by site preparation, demolition, and construction work in order to protect the health of the general public and on-site workers, minimize public nuisance complaints and avoid orders to stop work by the Department of Building Inspection. San Francisco Health Code Article 22B and San Francisco Building Code Section 106A.3.2.6 (collectively, the San Francisco Construction Dust Control Ordinance) require that all site preparation work, demolition, or other construction in San Francisco that could create dust or expose or disturb more than 10 cubic yards or 500 square feet of soil, comply with specified dust control measures.

Construction activities on the project site would be required by the Ordinance (San Francisco Building Code Section 106A.3.2.6.3) to implement the following or equivalent measures acceptable to the Director of Public Health:

- Watering construction areas to prevent dust from becoming airborne;
- Providing as much water as necessary to control dust (without creating run-off) for dust generating activities;
- Wet sweeping or vacuuming streets, sidewalks, paths and intersections where work is in progress at the end of each workday, covering inactive stockpiles of designated size;
- Covering any inactive stockpiles greater than ten cubic yards or 500 sf of material with a 10 mil plastic tarp and brace it down or use other equivalent soil stabilization techniques; and
- Using dust enclosures, curtains and collectors, as necessary, to control dust in excavation areas.

The air pollutant emissions associated with the proposed action were calculated using the California Emissions Estimator Model (CalEEMod) version 2016.3.1 (see Attachment A for modeling results). Construction was estimated to occur over approximately six months, based on CalEEMod default construction schedule for the land uses and project size. The architectural coating phase was extended from the default to last approximately half the duration of building construction to reflect a more accurate construction schedule. Project construction would include demolition of the existing 7,315-square-foot building as well as construction of the proposed apartment building. The proposed action would implement the BAAQMD’s Basic Construction Mitigation Measures including watering of exposed construction areas at least two times per day, which would also be in compliance with the San Francisco Dust Control Ordinance. In addition, the air quality modeling assumed compliance
with 2016 Title 24 Standards, which are 28% more efficient than 2013 Title 24 Standards.

The estimated construction-related and operational emissions for each pollutant for the proposed action are shown in the tables below.

**Table 3: Construction Air Pollution Emissions**

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>CalEEMod Estimate</th>
<th>BAAQMD Construction Thresholds</th>
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</thead>
<tbody>
<tr>
<td>ROG</td>
<td>28.2</td>
<td>54</td>
</tr>
<tr>
<td>NO₂</td>
<td>15.0</td>
<td>54</td>
</tr>
<tr>
<td>PM₁₀ (exhaust)</td>
<td>0.9</td>
<td>82</td>
</tr>
<tr>
<td>PM₂.₅ (exhaust)</td>
<td>0.8</td>
<td>54</td>
</tr>
<tr>
<td>CO</td>
<td>12.8</td>
<td>N/A</td>
</tr>
</tbody>
</table>

Source: CalEEMod 2016 Version 3.3.1, Winter Emissions. Table 2.1 “Overall Construction-mitigated.” See Attachment A.

**Table 4: Annual Operational Air Pollution Emissions**

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Operational Emissions</th>
<th>CAA Conformity Thresholds</th>
<th>BAAQMD Operational Thresholds</th>
</tr>
</thead>
<tbody>
<tr>
<td>ROG</td>
<td>0.7</td>
<td>100</td>
<td>10</td>
</tr>
<tr>
<td>NO₂</td>
<td>0.7</td>
<td>100</td>
<td>10</td>
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<td>0.4</td>
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<td>10</td>
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<tr>
<td>CO</td>
<td>2.6</td>
<td>100</td>
<td>N/A</td>
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Source: CalEEMod 2016 Version 3.3.1, Annual Emissions. Table 2.2 “Overall Operational-mitigated.” See Attachment A.

As shown in the tables above, development of the proposed project would not generate emissions exceeding CAA conformity thresholds or BAAQMD thresholds. Since the project would not exceed established thresholds for criteria pollutants, impacts would be less than significant.

**Source List:** 15, 16, 17, 18, Attachment A

Consistency with the California Air Resources 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. This 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 625
feet northeast of Van Ness Avenue, an extension of United States Route 101 (U.S. 101). 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 April 2014, the project site is located within an Air Pollutant Exposure Zone. Therefore, without air quality monitoring and analysis under development conditions, the proposed action would be required to incorporate enhanced ventilation to mitigate air quality impacts to residents on-site to be consistent with CARB recommendations.

Source List: 19, 20

**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; although the site is less than 0.1 mile from a bus stop on Turk Street, it is not located in proximity to a bus depot with a high volume of diesel emissions. In addition, proposed residential and commercial uses on-site would not be generate objectionable odors that would affect a substantial number of people. Impacts associated with objectionable odors would be less than significant.

Source List: 19, 26

<table>
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<th>Coastal Zone Management</th>
<th>Yes</th>
<th>No</th>
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<tbody>
<tr>
<td>Coastal Zone Management Act, sections 307(c) &amp; (d)</td>
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The project site is not within a Coastal Zone Management (CZM) area and 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: 21. 22

<table>
<thead>
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<th>Contamination and Toxic Substances</th>
<th>Yes</th>
<th>No</th>
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<tr>
<td>24 CFR Part 50.3(i) &amp; 58.5(i)(2)</td>
<td>☑</td>
<td>✗</td>
</tr>
</tbody>
</table>

**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 not currently located in a mapped Maher Area. However, Langan Treadwell Rollo conducted a Phase I Environmental Site Assessment (ESA) at the project site in June 2016. (Attachment B).

**Hazardous Conditions On-site**
Based on the Phase I ESA, two recognized environmental conditions (RECs) were identified. These include the potential for heavy metal or petroleum hydrocarbon contamination in the fill material, and polychlorinated biphenyls (PCBs) to the subsurface due to significant soil and chemical staining within the existing automobile repair area. Due to the RECs on site, the project site is subject to compliance with the City’s Maher Ordinance, and will be added to the next iteration of the Maher Map Area.

The site assessment identified significant soil and chemical staining within the building automobile repair area and hydraulic freight elevator. In addition, the potential for a release of hydraulic fluid and PCBs to the subsurface were identified due to the presence and age of six underground hydraulic hoists located at the project site. The site assessment determined that the site is likely underlain by fill material which commonly contains elevated levels of heavy metals and petroleum hydrocarbons. The sources of these chemicals general result from past debris from the 1906 earthquake and fire. As a follow up, Langan Treadwell Rollo prepared a Phase II ESA in 2016, and determined that the upper two to five feet of soil across half of the site would need to be managed and disposed of as a Class I Non-Federal Resource Conservation and Recovery Act (RCRA) hazardous waste during construction. In addition, another portion of soil would need to be managed as a Class II RCRA hazardous waste while the remaining soil at the site could be managed as a Class II non-hazardous waste.

The Phase II Site Assessment conducted soil vapor tests and detected tetrachloroethylene (PCE) concentrations ranging from 2.1 µg/m² to 290 µg/m². PCE concentrations were detected at levels above the residential environmental screening levels (ESLs) of 100 µg/m³ at 290 µg/m³. Chloroform was detected in groundwater at concentrations exceeding the groundwater vapor intrusion ESL for a residential scenario assuming deep groundwater and a sand soil type. The total risk and hazard index for inhalation of volatile organic compounds (VOCs) from soil vapor and groundwater for a residential building occupant were identified as de minimis and vapor mitigation was determined unnecessary.

Hazardous concentrations of lead were also detected at the project site and preparation of a site mitigation plan (SMP) and a health and safety plan (HASP) were recommended prior to construction. To address the hazardous concentrations of lead, a Mitigation Measure has been developed to require the implementation of an SMP, which would serve to mitigate the long-term environmental or health and safety risks caused by the presence of hazardous materials in the soil.

Asbestos and Lead Based Paint
The Phase I and II did not evaluate the potential for the occurrence of asbestos containing materials (ACMs) and lead based paint within the existing building, which was constructed in 1935. Given the age of the building (prior to 1979) it is likely that these hazardous building materials are present. The California Department of Toxic Substances Control considers asbestos hazardous, and removal of ACMs is required prior to demolition of construction activities that could result in the disturbance of these materials. ACMs must be removed in accordance with local and state regulations, BAAQMD, the California Occupational Safety and Health Administration (Cal/OSHA) and California Department of Health Services requirements.

Section 3426 applies to the exterior of all buildings or steel structures on which original construction was completed prior to 1979 (which are assumed to have lead based paint on their surfaces, unless demonstrated otherwise through laboratory analysis), and to the interior of residential buildings, hotels, and child care centers. The ordinance contains performance standards, including establishment of containment barriers, at least as effective as protecting human health and the environment as those in the U.S. Department of Housing and Urban Development Guidelines (the most recent guidelines for evaluation and control of lead based paint hazards) and identifies prohibited practices that may not be used in disturbances or removal of lead based paint. Any person performing work subject to the ordinance shall, to the maximum extent possible, protect the ground from contamination during exterior work; protect floors and other horizontal surfaces from work debris during interior work; and make all reasonable efforts to prevent migration of lead paint contaminants beyond containment barriers during the course of the work. Clean up standards require the removal of visible work debris, including the use of a high efficiency particulate air filter (HEPA) vacuum following interior work.

Demolition would also be subject to the Cal/OSHA Lead in Construction Standard (8 CCR section 1532.1). This standard requires development and implementation of a lead compliance plan when materials containing lead would be disturbed during construction. The plan must describe activities that could emit lead, methods that will be used to comply with the standard, safe work practices, and a plan to protect workers from exposure to lead during construction activities. Cal/OSHA would require 24-hour notification if more than 100 square feet of materials containing lead would be disturbed.

Implementation of procedures required by section 3426 of the Building Code and the lead in construction standard would ensure that demolition or renovation of structures with lead-based paint would not expose persons to hazardous materials.
**Nearby Sites**

The following databases were checked for nearby sites with contamination or presence of hazardous materials. The DTSC's database EnviroStor, and the State Water Resources Control Board's database GeoTracker, revealed no active sites within a 1,000 foot buffer from the site. Although 25 Leaking Underground Storage Tanks (LUSTs) were identified in the 1,000 foot buffer, all cases are currently completed and closed.

**Superfund**

The nearest federal superfund sites to the project site are located in Hunters Point, over four miles away to the southeast. The superfund sites located at Hunters Point are remnants of maritime activities, and leftover contamination from the shipyard. Due to the localized area of contamination, and proximity from the project site, there is a low likelihood that these sites would adversely affect the project site.

Based on the potential for soil contamination from heavy metals and PCBs, mitigation is required to prevent impacts regarding hazardous materials.

**Mitigation Measure**

**SMP and HASP.** An SMP and a HASP shall be submitted to the SFPDPH prior to the issuance of any permits. The SMP shall contain contingency plans to be implemented during soil excavation activities. In addition, the SMP shall include a site-specific HASP which will address hazards that may be encountered by on-site workers during remediation activities and will describe the steps necessary to minimize exposure of the public to potentially impacted soil and to physical hazards originating from soil excavation and disposal activities. The HASP shall outline proper soil handling procedures and health and safety requirements to minimize worker and public exposure to hazardous materials during construction.

Source List: 23, 24, 25, Attachment B

<table>
<thead>
<tr>
<th>Endangered Species</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402</td>
<td>☑️</td>
<td>☐</td>
</tr>
</tbody>
</table>

The project site is surrounded by urban environment and lacks existing vegetation. Implementation of the proposed action would involve construction on an entirely developed and paved site in an urban area. There are no endangered species, or species subject to the Endangered Species Act, existing on site. Thus, the proposed action would have no effect on natural habitats or federally protected species, and would be consistent with the Endangered Species Act.

Source List: 24, 26

<table>
<thead>
<tr>
<th>Explosive and Flammable Hazards</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>24 CFR Part 51 Subpart C</td>
<td>☑️</td>
<td>☐</td>
</tr>
</tbody>
</table>

The proposed residential and commercial 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...
<table>
<thead>
<tr>
<th>Protection Area</th>
<th>Yes/No</th>
<th>Information</th>
</tr>
</thead>
<tbody>
<tr>
<td>Farmlands Protection</td>
<td></td>
<td>Site located near thermal source hazards. Furthermore, no Above or under Ground Storage Tanks (ASTs and USTs) are located in proximity to the project site. Source List: 23, 25, 26</td>
</tr>
<tr>
<td>Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658</td>
<td>Yes/No</td>
<td>No protected farmlands are located within the City and County of San Francisco. The project site is listed as Urban and Built Up Land per the Department of Conservation; therefore, the proposed action would have no impact on farmlands. The proposed action would not conflict with the Farmland Protection Policy Act. Source List: 27</td>
</tr>
<tr>
<td>Floodplain Management</td>
<td></td>
<td>The project site is not located within a FEMA-designated 100-year floodplain or 500-year floodplain identified on the Preliminary Floodplain Map prepared for the City of San Francisco in November 2015. Source List: 13, 14</td>
</tr>
<tr>
<td>Executive Order 11988, particularly section 2(a); 24 CFR Part 55</td>
<td>Yes/No</td>
<td>Prehistoric Context</td>
</tr>
<tr>
<td>Historic Preservation</td>
<td></td>
<td>Throughout 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. 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 on 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, Siliticac, Amuictac, Tubsinite, and Petlenuc) within present day San Francisco. Yelamu may have also been the name of an additional settlement within the vicinity of Mission Dolores. Siliticac 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</td>
</tr>
<tr>
<td>National Historic Preservation Act (NHPA) of 1966, particularly sections 106 and 110; 36 CFR Part 800</td>
<td>Yes/No</td>
<td>In the historic period, the project site was unoccupied during the first half of the 20th century. The tire and battery shop at the site was constructed in 1935 along the</td>
</tr>
</tbody>
</table>
Van Ness Avenue auto row corridor that presents a commercial history of automobile support structures in San Francisco. The building was designed by master architect, Henry A. Minton and built by noted structural engineer, L.H. Nishkian. It was occupied by the business, Khan and Keville from 1935 to the present. The 1938 aerial image and 1948 Sanborn Fire Insurance Map shows the L-shaped building occupying the site in its current configuration. The footprint of the building and site remain unchanged as observed by subsequent historic aerial images and the 1998 Sanborn Fire Insurance Map.

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 [NPRP]); cultural items, as defined in the Native American Graves Protection and Repatriation Act of 1990; 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 unexcavated 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. 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;
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), California State Historic Preservation Officer (SHPO) and the Advisory Council on Historic Preservation (ACHP) 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 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 nine surrounding properties:

1) 500 Turk Street (project site)
2) 550 Turk Street;
3) 450 Golden Gate Avenue;
4) 601-605 Eddy Street;
5) 581-587 Eddy Street;
6) 556 Larkin Street;
7) 550 Larkin Street;  
8) 528-532 Larkin Street;  
9) 500-510 Larkin Street; and  
10) 452-460 Larkin Street. 

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 B, if a property in an undertaking's APE is already listed or has already been determined eligible for listing in the NRHP, the City must proceed in accordance with Stipulation VIII. Treatment of Historic Properties. The APE contains six (6) properties adjacent to the project site that are listed as contributors to the Uptown Tenderloin National Register Historic District (UTNRHD). The UTNRHD was listed on February 5, 2009. The district and its contributors are significant under Criterion A in the area of social history for its association with the development of hotel and apartment life, and under Criterion C in the area of Architecture for the distinctive mix of building types that served a new population in San Francisco. The period of significance for the historic district is from 1906 to 1957. The properties within the APE listed in the UTNRHD include: 

581-587 Eddy Street: Built in 1925 as the Sentinel Hotel by owner-developer Kincanon and Walker, designed in the Renaissance/Baroque style; 

556 Larkin Street: Built in 1925 as the Kosty Apartments by owner-developer Kincanon and Walker, designed in the Renaissance/Baroque style; 

550 Larkin Street: Built 1925 as the Taylor Apartments by owner-developer Kincanon and Walker, designed in the Renaissance/Baroque style; 

528-532 Larkin Street: Built 1927 as a store and apartment building by owner-developer Kincanon and Walker, designed in the Renaissance/Baroque style; 

500-510 Larkin Street: Built 1913 as a store and apartment building, the La Sonoma Apartments by owner F.A. Meyer, constructed by engineer Matteo Mattanovich in the Renaissance/Baroque style; 

and 452-460 Larkin Street: Built 1911 as a store and apartment building, the St. Paul Apartments in the Renaissance/Baroque style. 

Paragraph D of Stipulation VII of the 2007 PA requires the City to evaluate all properties that may be affected by an Undertaking using NRHP criteria set forth in 35 CFR Section 60.4. All such evaluations are to be documented.
by the City on a State of California Resource Agency Department of Parks and Recreation (DPR) 523 Forms. 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 City reviewed all existing information on all properties within the architectural APE for eligibility for listing in the NRHP. This process involved a review of any existing DPR forms for properties within the undertaking’s APE. The MOHCD retained Rincon to produce and update the DPR 523 forms for properties in the APE that have not previously been evaluated for listing in the NRHP.

In addition to the NRHP-listed UTNRHD, MOHCD has determined that three (3) properties within the APE, including the project site, are eligible for individual listing in the NRHP. One property, 601-605 Eddy Street, was determined to be ineligible for listing in the NRHP under any designation criteria. A summary of the DPR 523 forms for properties within the architectural APE evaluated under the current study is presented below (see Attachment C for the complete DPR 523 forms):

500 Turk Street (project site)

The automobile related building at 500 Turk Street, west of the project site, was constructed in 1935 and previously recorded in 2009 as part the 2010 Van Ness Auto Row Support Structures Survey. The survey was adopted by the San Francisco Historic Preservation Commission. It was found to be eligible for individual listing in the California Register of Historical Resources (CRHR). The San Francisco Planning Department completed a Historic Resource Evaluation Report for the property concurring with the findings in a Historic Resource Evaluation in 2017. Under the current efforts, the San Francisco Planning Department has determined that 500 Turk Street is eligible for listing in the NRHP under Criteria A and C pending further review. It is significant for its association with the development of the Van Ness auto row corridor and for its longevity of use as an automobile tire and battery shop (Criterion A), for its innovative design, which deviated from earlier auto repair shops by occupying only a portion of the site and leaving the rest for the maneuvering of automobiles, and for its Art Deco architectural style (Criterion C). There is no sufficient evidence to suggest that the Khan and Keville made significant contributions to the history of automobile development in San Francisco (Criterion B), nor is there evidence to suggest the property has the potential to yield important information (Criterion D). 500 Turk Street retains all aspects of its integrity to convey its significance as an auto service property with a distinctive and innovative design plan. The period of significance for the property begins in 1935, its year of construction to 1964.
the date of its use as both a tire and battery shop. The character defining features are the buildings plan and shape with two perpendicular wings, open vehicular maneuvering area, its height, the Art Deco styling, steel sash windows, and the two diamond-shaped "Goodyear Tires" signs.

**550 Turk Street**

The automobile related building at 550 Turk Street was previously recorded in 2009 as part the 2010 Van Ness Auto Row Support Structures Survey. It was found to be eligible for individual listing in the CRHR. Under the current efforts, the San Francisco Planning Department has determined that 550 Turk Street is eligible for listing in the NRHP under Criteria A and C pending further review. It is significant for its association with the development of the Van Ness auto row corridor and for its longevity of use as a public garage and automobile repair shop (Criterion A). It is also significant for its unique dual-entry design, which visually separates the garage and auto repair uses, and for its ornamental facade combining Classical and Gothic Revival architectural styles (Criterion C). There is no evidence to suggest that the property is associated with significant persons (Criterion B) or has the potential to yield important information (Criterion D). 550 Turk Street retains all aspects of its integrity to convey its significance.

**450 Golden Gate Avenue**

The San Francisco Planning Department has determined that the building at 450 Golden Gate Avenue is eligible for listing on the NRHP under Criterion A. Located south of the project site, across Turk Street, the twenty-story Philip Burton Federal Building, constructed in 1964 is associated with the postwar development of San Francisco in the Civic Center area. The subject property does not have a significant association with important persons in history (Criterion B), it is not the most architecturally significant examples of the Corporate Modern style constructed in the downtown San Francisco area (Criterion C), nor does it have the potential to yield important information (Criterion D). The plaza and the main entrance on Golden Gate Avenue were recently redesigned, diminishing the property’s integrity of design, materials and workmanship. However, 450 Golden Gate Avenue retains sufficient level integrity to convey its significance as a post-war constructed government building. The period of significance for the property is 164, the year of the buildings construction. The character defining features are its height, glass curtain wall construction, and granite base.

**601-605 Eddy Street**

The San Francisco Planning Department has determined that the building at 601-605 Eddy Street is ineligible for listing on the NRHP under any applicable designation.
criteria. Located to the north of the project site, the one- to two-story motel building, constructed in 1959 as the Caravan Lodge, is representative of the Mid-century Modern style motel building; however, there are more notable examples in San Francisco that are better representative of this property type. The subject property does not have a significant association with the development of motor lodges during the mid-twentieth century, in that it was one of many similar motel buildings constructed at the time (Criterion A). There is also no evidence to suggest that the property is associated with significant persons (Criterion B) or has the potential to yield important information (Criterion D).

**Interested Parties**

As part of the identification and consultation process, interested historical parties were consulted regarding the effects of the Undertaking on historic architectural properties on April 17, 2018. These included the California Historical Society, San Francisco Heritage, San Francisco Historical Association, and the San Francisco Museum and Historical Society. To date, no responses have been received from the identified historical parties (See Attachment C for the Interested Parties letters).

**TREATMENT OF HISTORIC PROPERTIES (STIPULATION VIII of the PA)**

Paragraph E of Stipulation VIII of the PA (Demolition) requires the City to consult with the SHPO if a Historic Property is proposed for demolition in an Undertaking per the guidance in Stipulation IX of the PA (see below). The building on the project site (500 Turk Street) is proposed for demolition and has been determined by the Planning Department to be a historic property. In accordance with Stipulation VIII.E.1, the City forwarded documentation to the SHPO in April 2018 explaining the need for demolition of the historic property at 500 Turk Street, a summary of the alternatives considered, structural analysis, cost estimates for rehabilitation, discussion of future plans for the site proposed mitigation as set forth in the Project Programmatic Agreement (Project PA), and provided comments received from the public. SHPO responded on September 28, 2018 and concurred that the City’s approach was appropriate for this undertaking. At present, the City has developed a Project PA for the Undertaking, which includes HABS documentation, an interpretive program, and a salvage plan as it pertains to historic architectural resources (See Attachment C for the Project 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 Secretary of the Interior’s Standards for the Treatment of Historic Properties (Standards).

The architectural APE includes three (3) individual historic properties outside of the project site that have been determined eligible for listing in the NRHP, and six (6) historic properties across Larkin Street that are listed in the NRHP as contributors to the UTNRHD. Per Stipulation VIII.F.1.a, the Planning Department reviewed the appropriate project documents including plans and drawings to determine the conformance of the Undertaking to the Standards. The Planning Department has determined that the undertaking would have no adverse effect upon neighboring historic properties.

**RESOLUTION OF ADVERSE EFFECTS (STIPULATION IX OF THE PA)**

Paragraph A of Stipulation IX of the PA (Resolution of Adverse Effects) requires the City to consult with the SHPO prior to any demolition of a Historic Property in an Undertaking to determine if the Historic Property should be treated in accordance with the SMMA set forth in Appendix B of the PA or if the consultation process set forth in 36 CFR Section 800.6 should be initiated. As discussed under Stipulation VIII (Treatment of Historic Properties) above. To date, the SHPO has not responded. Per the stipulation, if SHPO does not respond within 30 days, the City will assume concurrence with the Undertaking and proceed in implementing the Project PA developed for the Undertaking and furnish SHPO with a copy of the fully executed Project PA.

**CONSIDERATION AND TREATMENT OF ARCHAEOLOGICAL RESOURCES (STIPULATION XI OF PA)**

MOHCD, as the responsible agency under the NHPA, 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 as a result of the Proposed Action and alternatives.

In accordance with the Stipulation XI.B of the PA, the City requested that the Northwest Information Center (NWIC) conduct a records search for the undertaking’s APE. The records search conducted on July 12, 2017 indicated that no previous cultural resource studies and no previous recorded archaeological resources have been previously prepared that cover the project area (see Attachment C for the NWIC record search letter). The NWIC’s review of historical literature and maps indicated moderate potential for unrecorded Native American resources in the project area due to the site’s proximity to the San Francisco Bay shore. The review also indicated a
high potential for unrecorded historic period archaeological resources in the project area based on maps depicting development prior to the fires that burned this portion of San Francisco in 1906. Because the project site has been highly developed and has limited visibility of original surface soils, the NWIC recommended that prior to ground disturbance, a qualified archaeologist conduct further archival and field study to identify cultural resources.

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. On June 8, 2018, the City requested the SHPO’s comments. On September 28, 2018, the SHPO agreed to enter into a Project PA that addressed archeological as well as historic resources.

Pursuant to 36 CFR 800.6(a)(1), the City invited the Advisory Council on Historic Preservation (ACHP) to participate in the consultation process for development of the Project PA to protect potential archaeological resources. Upon receiving notification and supporting documentation concerning the proposed action, ACHP concluded that ACHP involvement does not apply and thus its participation is not needed in the consultation process.

Based on the reasonable presumption that archaeological resources may be present within the project site, MOHCD and the SHPO executed a Project PA on October 15, 2018, 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 Project PA 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 less than a half mile from the historic bay shore margins, the NWIC found a moderate potential for 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 March 30, 2018, 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, MOHCD contacted representatives of Native American tribes in the Bay Area on April 17, 2018 and asked for them to provide any information they may have on the site. Although consultation is ongoing, to
date, no representatives of Native American tribes have responded to MOHCD (see Attachment C for the NA Consultation).

**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 result in substantial adverse effects on historical architectural resources. The undertaking proposes to demolish the building at 500 Turk Street, which has been determined to be eligible for listing in the NRHP. SHPO consultation determined execution of the SMI/MA developed for the undertaking as set forth in Appendix B of the PA has resolved the substantial adverse effects on the historical architectural resource at 500 Turk Street (the Project PA in Attachment C). Additionally, the indirect project APE includes properties determined individually eligible for listing in the NRHP and historic properties listed in an NRHP Historic District. The Planning Department has determined that the undertaking would have no adverse effect upon neighboring historic properties. As such, the undertaking meets the compliances stipulated under the PA for and all adverse effects on historical architectural resources have been resolved.

**Compliance Steps**

The proposed action would be required to comply with the terms of the Project PA Between the City and County of San Francisco and the California State Historic Preservation Officer Regarding 500 Turk Street Affordable Housing Development, San Francisco, CA, October 15, 2018.

**Source List:** 54, 55, 56, 57, 58, 59, 60, 63

<table>
<thead>
<tr>
<th>Noise Abatement and Control</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B</td>
<td>☒</td>
<td>☐</td>
</tr>
</tbody>
</table>

**Construction Noise**

The project site and adjacent properties to the northeast, northwest, and southwest are zoned Residential-Commercial, High Density (RC-4). Existing land uses in the vicinity range from mid to high rise commercial, office, institutional, residential and hotels. The sensitive receptors nearest to the project site are the hotel component of the Phoenix Hotel, located directly adjacent
to the project site, and the residential buildings located across Larkin Street and at the southeast corner of Turk and Larkin streets. 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 drilled displacement columns and geopiers 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:

- 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 Turk Street and Larkin Street and general urban activities. Another noise generating source is Chambers Eat and Drink (located in the nearby Phoenix Hotel), which is defined as a place of entertainment per Ordinance 70-15. The San Francisco city-wide noise map, developed by the Department of Public Health shows street level noise levels between 65-70 dBA (Ldn) (normally unacceptable according to HUD standards) on the project site.

To characterize ambient noise levels on-site, LSA Associates, Inc. conducted one long-term 24 hour noise measurement and two short-term noise measurements on the project site on May 16th, 2017 (see Attachment D). The following table shows the average measured noise levels (the Ldn).

<table>
<thead>
<tr>
<th>Measurement Location</th>
<th>Primary Noise Source</th>
<th>Ldn (dBA)</th>
</tr>
</thead>
</table>

Table 5: Noise Measurement Results
As shown in the above table, the ambient noise levels at the project site ranged approximately between 70.1-71.4 dBA Ldn.

According to HUD site acceptability standards, exterior noise in the 65-75 dB Ldn range is normally unacceptable for residences and requires attenuation measures. The peak hour Leq is usually within 3 dBA of the Ldn. Therefore, residents on-site would experience ambient noise levels in HUD’s normally unacceptable range, especially at apartment units facing Larkin Street and Turk Street.

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 Ldn (see Attachment D). Estimated average annual daily traffic (AADT) was entered into the DNL calculator, using numbers from the San Francisco County Transportation Authority’s travel forecasting tool, SF-CHAMP. Traffic noise from Larkin Street and Turk Street, which were observed to be the primary sources of traffic noise during peak hours, were incorporated into the DNL Calculator. Because other roadways were not observed to contribute substantially to ambient noise, their traffic levels were not incorporated into the DNL Calculator.

The DNL Calculator estimated that traffic noise from Turk Street (6,219 ADT) would be approximately 67 dBA Ldn along the southern property line. The DNL Calculator estimated that traffic noise from Larkin Street (7,119 ADT) would be approximately 67 dBA Ldn along the eastern property line. This noise level (67 dBA Ldn) is representative of existing ambient conditions due to roadway traffic. The modeled 24-hour noise level is similar to the measured noise levels during peak hours and also falls within HUD’s normally unacceptable range.

In addition, traffic generated by residences on the project site would contribute to ambient noise levels experienced by sensitive receptors in the area. The addition of 108 residential units would generate an estimated 162 average daily trips.

The estimated total of 162 daily trips generated by the project were input into the HUD DNL Calculator to determine existing plus project roadway noise levels. Since there are no on-site off-street parking spaces on site, the 162 daily trips generated by the project were split...
evenly along Larkin Street and Turk Street. This conservative assumption was primarily made as ten on-
street parking spaces split evenly between Turk and 
Larkin Streets would be provided, and it is impossible to 
predict where other vehicles would travel in search for 
parking away from the site. Per the results of the HUD 
DNL calculator for existing plus project conditions, there 
would be no increase in noise due to the proposed action. 
Turk Street and Larkin Street would continue to generate 
noise levels of approximately 67 dBA Ldn, and would 
remain in HUD’s normally unacceptable range. 
Furthermore, it is reasonable to assume that the proposed 
transit-oriented development, being located in downtown 
San Francisco and within walking distance of the Civic 
Center/UN Plaza BART Station and next to several MUNI 
bus and light rail lines, would generate substantially fewer 
vehicular trips than typical residential and commercial 
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 Ldn 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) 
27 or higher.

Source List: 28, 29, 30, Attachment D

<table>
<thead>
<tr>
<th>Sole Source Aquifers</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149</td>
<td>☒</td>
<td>☐</td>
</tr>
</tbody>
</table>

The nearest sole source aquifer to the site is the Santa 
Margarita Aquifer. It is located over 50 miles from 
the project site. The project site is not served by a USEPA-
designated sole-source aquifer. Therefore, the proposed 
action would have no effect on a sole-source aquifer 
subject to the HUD-USEPA Memorandum of 
Understanding.

Source List: 31

<table>
<thead>
<tr>
<th>Wetlands Protection</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
</table>
| Executive Order 11990, 
particularly sections 2 and 5 | ☒ | ☐ |

There are no wetlands on site, as the site is entirely 
developed and paved. The nearest wetland to the project 
site is the China Basin Water Channel, located 
approximately 1.25 miles southeast of the site. The China 
Basin Water Channel is part of the estuarine and marine 
deep-water wetland jutting from the San Francisco Bay.
Wild and Scenic Rivers
Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c) | Yes | No | The proposed action would have no impact on wetlands or other water of the state. Source List: 32

The nearest wild and scenic river to the project site is the American Wild and Scenic River, located over 70 miles from the project site. Since the project would not affect a wild and scenic river, the proposed action would be consistent with the Wild and Scenic Rivers Act policies. Source List: 33

Environmental Justice
Executive Order 12898 | Yes | No | The project site is within U.S. Census Tract 124.02. In 2016, 41.2 percent of the City was white, 15.3 percent was Hispanic or Latino, 33.5 percent was Asian, 5.1 percent was Black or African American, 3.9 percent was two or more races, 0.3 percent was Native Hawaiian and Other Pacific Islander, 0.2 percent was American Indian and Alaska Native, and 0.5 percent was some other race. This represents a greater percentage of environmental justice populations than exists nationwide.

Within Census Tract 124.02, approximately 28.7 percent of people were living below the poverty line, which is more than double the citywide average of 10.1 percent. The proposed action would provide 107 new housing units affordable to low-income people, including minority and other populations earning less than 60 percent of the AMI. Residential supportive services would be provided on the ground floor of the site, including a community room, laundry room, community kitchen and a supply room. In addition, ground floor common space would be provided in the form of an outdoor courtyard, play area, and plaza. Furthermore, as discussed above under Clean Air, residents on the project site would not be exposed to substantial health risks related to cancer, acute and chronic hazards, or particulate matter. As the proposed action would result in no substantial adverse environmental effects, it would not result in disproportionately high and adverse effects on minority and low-income populations, and the proposed action would not create environmental justice concerns. The proposed action would be consistent with Executive Order 12898. Source List: 7

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
<table>
<thead>
<tr>
<th>Environmental Assessment Factor</th>
<th>Impact Code</th>
<th>Impact Evaluation</th>
</tr>
</thead>
<tbody>
<tr>
<td>LAND DEVELOPMENT</td>
<td>2</td>
<td>The project site is located in the Tenderloin neighborhood in San Francisco, California. The site is located in an area primarily composed of residential and commercial land uses zoned Residential-Commercial High Density (RC-4). The Civic Center Planning Area, Public (P) zone is adjacent to the project site to the south, where the U.S. Courthouse is located.</td>
</tr>
</tbody>
</table>

**Land Use and Zoning**

**Permitted Land Uses**

The project site is currently zoned RC-4 under the San Francisco Planning Code. According to Section 206.3 of the Planning Code, RC-4 Districts encourage a combination of high-density dwellings, 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 RC-4 District.

**Height and Bulk Designation**

In the RC-4 District, housing density is limited by lot area. Under current zoning, the project site’s density is limited to three dwelling units per lot, or one dwelling unit per 200 square feet of lot area (a maximum of approximately 94 dwelling units for the project site). In addition, the RC-4 District limits building heights to 40 feet, but is allowed up to 80 feet by conditional use, per the height and bulk map (identified as 80-T).[34, 35] The proposed eight-story, 80-foot-tall building would not exceed this height limit. The Planning Code specifies requirements for a bulk designation of “T”, where the base cannot extend to a streetwall height over 1.25 times the width of the widest abutting street or 50 feet, whichever is more. In addition, the maximum length is 110 feet and the maximum diagonal dimension is 125 feet.

**Floor-to-Area Ratio**

Section 124 of the Planning Code sets a floor-to-area ratio (FAR) of 4.8 in the RC-4, but does not apply to dwellings. With 2,600 sf of commercial uses on an 18,905 sf lot, the building would have a FAR of 0.14. This FAR is below the limit of 4.8 in the RC-4 zone.

**Rear Yard Setback**

The RC-4 District 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). However, this section of the Planning Code does not apply to 100 percent affordable housing projects, and therefore would not apply to the proposed action. In addition, open space would be provided in a courtyard at the ground floor. All dwelling units face onto either this courtyard or onto Turk or Larkin Streets; therefore, ample separation for light and air would be provided at residential units.

**Open Space**

Section 135 of the Planning Code requires the provision of 36 sf of...
private open space per dwelling unit, or 48 sf of common open space per dwelling unit. The proposed 108 dwelling units would therefore require 5,184 sf of common open space. The project would include a 5,240 sf ground floor courtyard, which would be consistent with the required residential open space.

Parking

Section 151 of the Planning Code does not require off-street parking for group housing in the RC-4 District. The proposed project would not include off-street parking and is consistent with zoning requirements for parking.

Based on the above, the proposed action would generally be compatible in terms of land use and zoning.

Conformance with Plans

The proposed project site lies in the Civic Center Area Plan as well as the Downtown Area Plan. Both are discussed in detail below:

Civic Center Area Plan

Although the project site is not located in the Civic Center core, the Civic Center Area Plan includes the project site. This plan promotes four key objectives:

- **Objective 1**: Maintain and reinforce the Civic Center as the symbolic and ceremonial focus of community government and culture
- **Objective 2**: Develop the Civic Center as a cohesive area for the administrative functions of the city, state and federal government, and as a focal point for cultural, ceremonial, and community activities
- **Objective 3**: Provide convenient access to and circulation within the Civic Center and support facilities and services
- **Objective 4**: Protect and enhance the housing resources in the area

In addition to these Civic Center objectives, the following policies to provide general guidance for development of the area, which are applicable to the proposed action, are listed below:

- **Policy 3.3**: Provide and price parking for short-term visitor use, and discourage long-term parking. Encourage transit use as the primary means of access to the Civic Center
- **Policy 3.4**: Encourage privately operated support and personal service establishments to locate within the Civic Center area
- **Policy 4.2**: Encourage new infill housing at a compatible density

The proposed development would be generally consistent with these policies from the Civic Center Area Plan. By providing 107 affordable housing units, the proposed action would increase the availability of new housing affordable to families and individuals with lower incomes. The proposed combination of housing with ground-floor commercial space also would improve the mixture of uses in the Civic Center area. Furthermore, development of the proposed project would not contribute to long-term parking availability. For these reasons, the proposed action would generally conform to the vision of the Civic
Center Area Plan.  

**Downtown Area Plan**

The project site and vicinity are also located in the Downtown Area Plan. This plan promotes several applicable objectives to the proposed action:

- **Objective 3:** Improve downtown San Francisco's position as the region's prime location for specialized retail trade
- **Objective 5:** Retain a diverse base of support commercial activity in and near downtown
- **Objective 7:** Expand the supply of housing in and adjacent to downtown
- **Objective 8:** Protect residential uses in and adjacent to downtown from encroachment by commercial uses
- **Objective 9:** Provide quality open space in sufficient quantity and variety to meet the needs of downtown workers, residents, and visitors
- **Objective 11:** Provide contrast and form by consciously treating open space as a counterpoint to the built environment
- **Objective 12:** Conserve resources that provide continuity with San Francisco's past
- **Objective 13:** Create an urban form for downtown that enhances San Francisco's stature as one of the world's most visually attractive cities
- **Objective 14:** Create and maintain a comfortable pedestrian environment
- **Objective 15:** Create a building form that is visually interesting and harmonizes with surrounding buildings
- **Objective 16:** Create and maintain attractive, interesting urban streetscapes
- **Objective 17:** Develop transit as the primary mode of travel to and from downtown
- **Objective 19:** Provide for safe and convenient bicycle use as a means of transportation
- **Objective 21:** Improve facilities for freight deliveries and business services
- **Objective 22:** Implement a downtown streetscape plan to improve the downtown pedestrian circulation system, especially within the core, to provide for efficient, comfortable, and safe movement
- **Objective 23:** Reduce hazards to life safety and minimize property damage and economic dislocation resulting from future earthquakes

In addition to the objectives, fundamental principles for the downtown pedestrian network are also outlined. The following general design policies and general principles are applicable to the proposed action:

- Regardless of sidewalk width or streetscape elements, a minimum of six feet (6') must be left clear at all times for pedestrian through movement. Six feet is necessary to ensure a consistent clear passage and should be exceeded wherever possible. In an area with significant pedestrian volumes, and represents the minimum width; for many sidewalks downtown, more than six feet may be necessary.
Regardless of sidewalk width, no sidewalk element is permitted if the placement of that element would cause the non-holiday peak pedestrian level of service to fall to level D, E, or F.

- Ensure convenient and safe pedestrian crossings. Widen sidewalks at corners where possible to provide more pedestrian queuing space and shorter crosswalk distances. Widen the crosswalk space at intersections with Pedestrian LOS D or below.

- The corner clear zone is the minimum amount of pedestrian queuing space at the corner and is required at every corner in the downtown area. The clear zone extends a minimum of five feet (5') from the inside edge of the crosswalk and defines an area from the curb to the property line. Only items essential to vehicular and pedestrian safety and flow may remain within the clear zone. No other element may be placed within the clear zone including temporary elements.

- Conserve and promote in-ground street trees for all downtown sidewalks.

- Art in the public right-of-way is strongly encouraged throughout the downtown area. Art installations might range from sculptures, sidewalk inlays, and kiosk displays to performance art, dance pieces, and temporary installations.

- Corner Setbacks: Permit added pedestrian space at block corners for pedestrian queuing, often in lieu of added sidewalk space. These setbacks are encouraged.

- The typical downtown corner should have five primary components including a trashcan, traffic/pedestrian signal device, fire hydrant, newsracks (preferably fixed), and a clear zone indicator. The clear zone indicator is a band in the concrete scoring at the corner indicating the clear zone boundaries.

The proposed uses on-site would house 157 persons, which represents a 4.4 percent increase in population near the site. The proposed action would not substantially increase the population or result in deficiencies or decreased performance of public transportation and regional transit service. The project includes a landscaped plaza and widened sidewalks on Turk and Larkin Streets, and a total of 14 street trees would be planted along Turk and Larkin frontages. In addition, no trees or landscaping are proposed for removal from the public right-of-way. As such, project improvements would be in accordance with the Better Streets Plan and would be generally consistent with the objectives and pedestrian principles outlined above, from the Downtown Area Plan. The proposed combination of housing with ground-floor commercial space also would improve the mixture of uses in the Downtown District.

Visual Consistency

The project site is located at the northwest corner of the intersection of Turk and Larkin Streets. The proposed project's design would be generally consistent with surrounding development. Ground-floor commercial uses on the project site also would be compatible with existing pedestrian-oriented commercial uses on both Lark and Turk Streets. The contemporary design of the proposed nine-story building would be compatible with the varying sizes of buildings in the greater Downtown/Civic Center area, which includes a variety of styles and
periods of architecture.

The proposed building’s eight-story height also would be incrementally larger in scale than immediately surrounding development, which ranges from two to six stories in height; except for the 21-story Phillip Burton Federal Building immediately to the south. Nevertheless, the building’s scale would be compatible with other apartment buildings in the greater Civic Center and Downtown area.

Therefore, in the context of the redeveloping Civic Center and Downtown area, the proposed action would not result in substantial adverse aesthetic effects related to scale and urban design.

**Source List:** 24, 34, 35, 36, 37

<table>
<thead>
<tr>
<th>Soil Suitability/ Slope/ Erosion/ Drainage/ Storm Water Runoff</th>
<th>3</th>
</tr>
</thead>
</table>

The project site is entirely comprised of Urban land, according to the U.S. Department of Agriculture’s Web Soil Survey.

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 that they conform to the recommendations in the Geotechnical Investigation prepared by Langan Engineering and Environmental Services, Inc. for the proposed project in December 2016 (Attachment E). The report concluded that the project site is feasible for the proposed project; however, the report discusses concerns including, but not limited to, static and seismic settlement, and soil corrosivity. To address these geotechnical concerns, the report includes conclusions and recommendations, as outlined in Section 7 and Section 8 of Attachment E. Compliance with these recommendations have been developed into a mitigation measure (see below) and would ensure that the site is properly prepared for the proposed development. In addition, design and structural requirements to address geologic hazards and soil suitability per San Francisco DBI regulations would ensure that potential damage to structures from soil suitability would not be a substantial adverse effect.

The project site is relatively flat with a gentle downslope towards Turk Street, from the northern portion of the site, and currently paved with asphalt. 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 surface (with the exception of landscaping on the ground floor courtyard). During construction and operation of the proposed residential and commercial uses, the project sponsor 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 prior to implementation.
In addition, the proposed project would be supported on a mat foundation bearing on improved soil. Excavation would be limited to between two and six feet for utility connections, and the proposed mat foundation and support for the mat foundation system would be provided through ground improvement of the soil, with maximum soil disturbance occurring approximately 17 to 21 feet below grade, depending whether the ground improvement is on the downslope or the upslope portion of the project site, respectively.

The project site is located in the greater Mission Creek watershed, which drains to the Mission Creek estuary at the eastern edge of San Francisco Bay. As of 2012, the Mission Creek estuary is included in USEPA’s 303(d) list of impaired waterways for these pollutants:

- Ammonia
- Chlordane
- Lead
- Polychlorinated biphenyls (PCBs)
- Silver
- Zinc
- Dieldrin
- Hydrogen Sulfide
- Mercury
- Polycyclic Aromatic Hydrocarbons

Stormwater runoff from the project 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. Before stormwater runoff from the building leaves the site, it would be filtered by on-grade landscaping planters and permeable paving systems. With implementation of this landscaping, development of the site would not result in substantial new sources of off-site stormwater pollution. In fact, removal of the existing parking lot would reduce stormwater pollution from petroleum-based hydrocarbons that can leak from motor vehicles. The project sponsor for on-site development 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.

Mitigation Measure

Geotechnical Recommendations. The project proponent shall incorporate all conclusions and recommendations included in the Geotechnical Investigation prepared by Langan, Treadwell, and Rollo, dated December 21, 2016. These recommendations include, but are not limited to:

- The proposed building shall be supported on a mat bearing on improved ground, and localized areas of bearing pressures shall not exceed the allowable bearing capacity provided by the improved ground. The mat foundation shall be designed to span between ground improvement columns/elements.
- A qualified, design-build, specialty contractor, who has previously successfully performed ground improvement in similar subsurface soil conditions, shall design and perform the ground improvement to support the structural loads with
| Hazards and Nuisances including Site Safety and Noise | 3 |
| Site Safety |
| Development of the project site with residential and commercial 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 surrounding uses. While soil contamination with heavy metals and PCBs, and potential asbestos containing materials and lead based paint may exist on-site, the implementation of a mitigation measure is required, detailing site-specific procedures to be followed which would prevent safety hazards for construction workers on-site (see Contamination and Toxic Substances).

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 in Soil Suitability, Slope, Erosion, Drainage, Storm Water Runoff 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.

Construction Noise |
| As detailed above under Statues, Executive Orders, and Regulations Listed at 24 CFR 50.4 & 58.5, Noise Abatement and Control, 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 Statues, Executive Orders, and Regulations Listed at 24 CFR 50.4 & 58.5, Noise Abatement and Control, the proposed action would place new residential units in an area subject to “normally unacceptable” 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: 38, 39, 40, Attachment E |

| Energy Consumption | 2 |
| Residential and commercial 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. |

Source List: 23, 24, 25, 26, 28, 29, 30, 63, Attachment D, Attachment E |
consumption, including Title 24 of the California Code of Regulations enforced by the DBI. Beyond compliance with the 2016 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. Since the project would be required to adhere to 2016 California Green Build Standards, and would include energy reducing design features, the proposed action would not result in foreseeable energy inefficiencies and would not have a substantial adverse effect on energy consumption.

Source List: 62

<table>
<thead>
<tr>
<th>Environmental Assessment Factor</th>
<th>Impact Code</th>
<th>Impact Evaluation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Employment and Income Patterns</td>
<td>1</td>
<td>Construction of the proposed apartment building would displace the existing on-site commercial automobile service shop, which provides employment for six persons. However, construction would provide temporary construction work, and the ground-floor commercial retail and/or non-profit uses would generate up to 18 new jobs on-site. Therefore, the proposed action would have a net beneficial effect on employment and income patterns. Source List: 63</td>
</tr>
</tbody>
</table>
| Demographic Character Changes, Displacement | 2 | Demographic Character Changes
The proposed action would result in the establishment of 108 residential units on the project site; based on an average household size of U.S. Census Tract 124.02 of 1.5 persons per unit, this would represent an estimated 157 residents.

Development of the site with residential and pedestrian-oriented commercial uses would enhance walkability within the Turk and Larkin 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. Further, it would not result in inconvenient or difficult access to local services, facilities and institutions, or other parts of San Francisco.

Displacement
The project site is currently host to a tire and automobile service center operated by the firm Kahn & Keville, supplying approximately six jobs [41]. Although the proposed action would displace this business from the site, Kahn & Keville operate one other tire and automotive service in the City of San Francisco. Furthermore, the project would provide ground-floor commercial retail that would generate up to seven new jobs on-site and 11 employees with the residential uses. Because there are no residences, or any type of permanent or temporary housing located on-site, the project would not displace any existing residents. Therefore, the project would not result in substantial adverse impacts from displacement of people or
### Environmental Assessment Factor

<table>
<thead>
<tr>
<th>Factor</th>
<th>Code</th>
<th>Impact Evaluation</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>COMMUNITY FACILITIES AND SERVICES</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Educational and Cultural Facilities</td>
<td>2</td>
<td>The San Francisco Unified School District (SFUSD) provides public primary and secondary education in San Francisco. The district is composed of a total of 136 schools, including 12 early education schools, 64 elementary schools (Grades TK–5), eight alternatively configured elementary through middle schools (Grades TK–8), eight 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 October 2016 (without charter enrollment), was 55,613 students. Approximately 6.5 percent of the population in Census Tract 124.02 is under the age of 18. Although development on-site could add up to 162 residents (as described under subheading Demographic Character Changes, Displacement), including approximately 11 school-aged children (based on Census Tract 124.02 population statistics, 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)(b) of the California Government Code (Senate Bill 50, chaptered August 27, 1998), the payment of statutory fees &quot;...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.&quot; The project site does not contain cultural facilities, and the proposed action would not affect existing cultural facilities by its operation. Cultural facilities within the City are accessible from the project site via public transportation.</td>
</tr>
<tr>
<td>Commercial Facilities</td>
<td>1</td>
<td>The project would provide ground-floor commercial retail uses that would generate up to seven new jobs on-site. The introduction of commercial uses on the project site would contribute to the economic revitalization of the Civic Center and Downtown Areas. Furthermore, the project site is within adequate and highly convenient pedestrian or transit access to retail services; the Civic Center/UN Plaza BART Station is located three blocks south, and several on-street MUNI buses (including the routes 7X-Noriega Express, 31-Balboa, 27-Bryant, 47-Van Ness, 49-Van Ness/Mission, 21-Hayes, 38-Geary, 9R-San Bruno Rapid, J-Church, K-Owl, L-Taraval, M-Ocean View, N-Judah, T-Owl, L-Taraval, M-Ocean View, N-Judah, T-Owl, 14R-Mission Rapid, and 9-San Bruno) stop within a few blocks of the project site. Also, the following Golden Gate Transit and SanTrans bus lines provide service from Mission Street and Van Ness Avenue to the North Bay and South Bay, respectively:</td>
</tr>
</tbody>
</table>

Source List: 7, 41, 43, 63
<table>
<thead>
<tr>
<th>Health Care and Social Services</th>
<th>2</th>
</tr>
</thead>
</table>
|                                 | A wide array of health care and social services is accessible from the project site via public transit. The City and County of San Francisco Department of Public Health has 16 health care centers, 14 community clinic consortiums, and five medical homes. These facilities could be accessed from the project site through the Civic Center/UN Plaza BART Station, which is located three blocks south of the site, and by several MUNI and Golden Gate Transit buses that stop within a few blocks of the site.

Furthermore, the addition of residents on the project site would not result in undue burdens on existing health care facilities or create substantial demand for new health care facilities. Based on the average household size of 1.5 people in U.S. Census Tract 124.02, the proposed 108 residential units would house an estimated 162 people. This number of people represents less than 0.01 percent of the total San Francisco estimated population of 870,887 (as of 2016).

The level of population increase described above would not represent a substantial change to the demographic of the area and so would not result in substantial impacts on the existing social services serving the project area. |

Source List: 43

<table>
<thead>
<tr>
<th>Solid Waste Disposal / Recycling</th>
<th>2</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>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/demolition 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. Demolition of the existing tire and automotive service shop and surface parking lot, in addition to the construction of a new apartment building on the project site would generate solid waste. However, according to the 100 percent schematic design plans for the</td>
</tr>
</tbody>
</table>
project, 85 percent of construction and demolition waste would be
diverted from the landfill. During operation, the project could
generate an estimated 382,666 pounds of solid waste per year, based
on generation rates summarized by CalRecycle for multi-family
residential (8.6 pounds/per unit/per day) and retail commercial uses
(0.046 pounds/per square foot/per day). This amount would represent
a relatively small amount of solid waste in proportion to the total
amount of solid waste generated by the City’s estimated population of
870,887 residents. 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: 24, 44, 46, 47, 63, 64

<table>
<thead>
<tr>
<th>Waste Water / Sanitary Sewers</th>
<th>2</th>
</tr>
</thead>
</table>

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 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 develop 108 affordable housing units and 2,600 sf of retail commercial. For the project, total wastewater generation is estimated at 19,700 gallons per day (gpd; based on City of San Mateo generation rates of 180 gpd for multi-family residential units and 0.1 gallon per sf of retail commercial uses). 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.
<table>
<thead>
<tr>
<th>Category</th>
<th>Impacts</th>
</tr>
</thead>
<tbody>
<tr>
<td>Water Supply</td>
<td>Development of the project site with residential and commercial uses would increase demand for water. Total project water demand is estimated at 8,555 gpd (based on City of San Mateo water demand rates of 78 gpd for multi-family residential units and 0.05040 gpd per sf of retail commercial uses). However, such water demand is not in excess of amounts expected and provided for within the project area. Water would be provided to the project by the SFPUC. Therefore, implementation of the proposed action would not have a substantial adverse effect on water supply.</td>
</tr>
<tr>
<td>Public Safety - Police, Fire and Emergency Medical</td>
<td>The project area is served by the San Francisco Police Department. The development of residential and commercial uses on the project site would incrementally increase demand for police services within the Tenderloin police district. However, the site is within the existing service area the increase would be incremental, 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). Fire Station 3 is located approximately 0.3 miles north of the project site, at 1067 Post Street. The proposed action could incrementally increase demand for fire protection services within the project area. However, 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. The project also would be required to meet SFFD standards for adequate site access and water flow. 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 proposed action would not require a significant change in emergency medical services already provided in the area.</td>
</tr>
<tr>
<td>Parks, Open Space and Recreation</td>
<td>The proposed action would involve development of 108 residential units and ground-floor commercial uses. The project includes the</td>
</tr>
</tbody>
</table>

Source List: 48, 49, 24, 50, 51
development of a courtyard plaza and play area for residents to utilize. Pursuant to Policy 9.1 and Policy 11.2 in the Downtown Area Plan, indoor and outdoor open space and the introduction of the natural environment to contrast the built-up environment of downtown is provided in the project.

Several existing community parks surround the project site and would be available for use by project residents. A small pocket park and children’s playground is located one block east of the project site at the corner of Turk Street and Hyde Street. The Tenderloin Children’s Playground is located approximately 0.2 mile to the northeast, on Ellis Street between Hyde Street and Leavenworth Street. The Father Alfred E. Boedeker Park is located approximately 0.3 mile east of the project site, on the corner of Eddy Street and Jones Street. The Sergeant John Macaulay Park is located approximately 0.2 mile north of the project site, on the corner of O’Farrell Street and Larkin Street. A large recreation complex consisting of Jefferson Square Park, the Margaret S. Hayward Playground, and the James P. Lang Field is located approximately 0.3 mile west 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 108 residential units to the neighborhood would not overly burden or otherwise degrade existing parks and open spaces.

Therefore, 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: 7, 24, 37

<table>
<thead>
<tr>
<th>Transportation and Accessibility</th>
<th>2</th>
<th>Traffic</th>
</tr>
</thead>
</table>
|                                 |   | The proposed action consists of the development of 107 units of affordable housing and 2,600 sf of commercial space. Residential development on the project site would generate vehicle trips on surrounding roadways. The addition of 108 residential units and 2,600 sf of commercial space would generate an estimated 162 average daily trips (including 23 PM peak hour trips), based on the transportation study determination prepared for the project.

This increase in vehicle trips to the site from the proposed buildout 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 robust transit opportunities available within several blocks of the site, including the Civic Center/UN Plaza BART Station and several MUNI rail and bus lines. Therefore, proposed buildout of the project site would not result in substantial adverse effects on area roadways or intersection operations.

Transit

The project area is well-served by public transit, with access to the Civic Center/UN Plaza BART Station and public bus routes. All six MUNI subway lines stop at the Civic Center/UN Plaza Station. In addition, several on-street MUNI bus lines operate within a few blocks of the site: 7X-Noriega Express, 31-Balboa, 27-Bryant, 47-Van Ness, 49-Van Ness/Mission, 21-Hayes, 38-Geary, 9R-San Bruno Rapid, J-Church, K-Owl, L-Taraval, M-Ocean View, N-Judah, T-
Owl, 14R-Mission Rapid, and 9-San Bruno. Also, the following Golden Gate Transit and SamTrans bus lines provide service from Mission Street and Van Ness Avenue to the North Bay and South Bay, respectively:

- Golden Gate 101 (Santa Rosa)
- Golden Gate 101X (Santa Rosa – Express)
- Golden Gate 70 (Novato)
- Golden Gate 30 (San Rafael)
- SamTrans 292 (Hillsdale Mall);
- SamTrans KX (Redwood City Transit Center); and
- SamTrans 397 (Palo Alto Transit Center)

Development of the project site may potentially increase transit demand due to new residents and visitation to commercial uses on-site, but this additional demand would not noticeably affect transit service or result in substantial adverse effects on transit. Therefore, the proposed action would not result in substantial adverse effects on transit service.

**Source List:** 4, 6, 45, 63

**Pedestrian**

Pedestrian facilities include sidewalks, crosswalks, curb ramps, pedestrian call buttons at intersections, and mixed-use pathways. The project proposes widening the sidewalks on both Turk and Larkin Streets in accordance with the Better Streets Plan. In addition, the project proposes the use of a landscaped, outdoor plaza for pedestrians to access and utilize, in conjunction with the commercial uses on the ground floor. A Transportation Study Determination Request Memo was prepared by the San Francisco Planning Department’s Memo (Memo) for the 500 Turk Street Project, which determined that the project would generate approximately 352 walking trips per day. Per the conclusions of the Memo, the project did not warrant the preparation of a Transportation Impact Study, and that the persons generated by the project would not significantly impact the local transportation network (bicycles, pedestrians, public transit, etc.). The project site currently adjoins a 15-foot-wide sidewalk providing pedestrian access from Turk and Larkin Streets. 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.

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 mixed-use, urban setting of the project site. Therefore, the proposed action would not result in substantial adverse effects on pedestrian facilities.

**Source List:** 6, 24, 26, 45, 63

**Bicycles**

Bicycle facilities consist of bicycle lanes, trails, and paths, as well as bike parking, bike lockers, and showers for cyclists. On-street bicycle facilities are grouped into three categories:

- Class I facilities consist of off-street bicycle paths and are
generally shared with pedestrians. Class I facilities may be next to a roadway or may be entirely independent of existing vehicular facilities.

- Class II facilities consist of striped bicycle lanes on roadways. These facilities reserve a minimum of five feet of space for bicycle traffic.
- Class III facilities consist of designated and signed bicycle routes where bicyclists share the roadway with motor vehicles.

In the vicinity of the project site, the San Francisco 2009 Bike Plan designates Webster Street, west of the project site, as Class II and Sutter Street, Post Street, and McAllister Street as Class III Bike Routes.

New residential and commercial uses on-site could 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 with more than 3 dwelling units must provide one Class I bike parking space for every dwelling unit, plus one Class I space for every four dwelling units over 100. In addition, one Class II bike parking space is required for every 20 units. Thus, for the proposed 108 residences, the provision of 110 Class I bike parking spaces and 5 Class II bike parking spaces would be required. The project proposes to include 110 Class I bike parking spaces and 12 Class II bike parking spaces. Therefore, the proposed action would not result in substantial adverse effects on bicycle facilities.

Source List: 52

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 to retail uses. Development on the project site would be required to comply with Planning Code requirements, and would therefore be reasonably anticipated to include required loading spaces. No project impacts are identified.

Parking

Off-street parking spaces are required in different quantities based on the proposed on-site use, based on the City's Planning Code. The proposed action consists of the construction of 107 units of affordable housing, one manager's unit, and an estimated 2,600 sf of commercial space.

Development of the site would remove the existing on-site parking lot. However, development on the project site would meet the City's parking requirements. Pursuant to Section 151 of the Planning Code,
the RC-4 District does not require that individual residential or commercial buildings provide off-street parking. In addition, San Francisco General Plan policies emphasize the importance of public transit use and discourage facilities that encourage automobile uses, such as parking, to minimize the environmental impact of traffic congestion, noise, and air quality associated with unconstrained vehicle use. Therefore, the creation of, or increase in, parking demand resulting from a proposed project that cannot be met by existing or proposed parking facilities would not itself be considered a significant effect on the environment.

Source List: 24, 36, 63, 65

<table>
<thead>
<tr>
<th>Environmental Assessment Factor</th>
<th>Impact Code</th>
<th>Impact Evaluation</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>NATURAL FEATURES</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Unique Natural Features, Water Resources</td>
<td>2</td>
<td>The project site is relatively flat and entirely paved. No unique features are on the site. The proposed action would involve development of an eight-story apartment building on-site. This development would not affect water resources, nor would it use groundwater resources. As noted above, water service at the project site would be provided by the SFPUC. Further, development on the project site would not discharge effluent into surface water or groundwater. No surface waters (e.g., lakes, rivers, ponds) are located on or adjacent to the project site. The San Francisco Bay is located 1.7 miles east of the project site. Wastewater at the project site would be collected and treated by the combined sewage and stormwater system. Source List: 24, 32, 48</td>
</tr>
<tr>
<td>Vegetation, Wildlife</td>
<td>2</td>
<td>The project site is developed with a tire and automobile service shop and lacks any landscaping or vegetation. Furthermore, the site is located in the highly urbanized Tenderloin neighborhood of San Francisco. Therefore, the development of residences and ground-floor commercial uses on the project site would not have a substantial adverse effect on vegetation or wildlife. Source List: 24, 26, 32, 63</td>
</tr>
<tr>
<td>Other Factors</td>
<td>2</td>
<td>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. Construction and operation of the project also would involve the emission of greenhouse gases (GHGs). Of these gases, carbon dioxide (CO₂) and methane (CH₄) are emitted in the greatest quantities from human activities. Emissions of CO₂ are largely by-products of fossil fuel combustion, whereas CH₄ results from off-gassing associated with agricultural practices and landfills. Because GHGs absorb different amounts of heat, a common reference gas (CO₂) is used to relate the amount of heat absorbed to the amount of the gas emissions, referred to as “carbon dioxide equivalent” (CO₂e), and is the amount of a GHG emitted multiplied by its global warming potential. In February 2010, the Council on Environmental Quality (CEQ) provided a draft guidance memorandum on consideration of the effects of climate change and GHG emissions in National Environmental Policy Act documentation. This document identifies</td>
</tr>
</tbody>
</table>
the CAA reporting requirement of 25,000 metric tons (MT) or more of CO₂-e as an indication that greenhouse gas emissions could be considered as potential adverse impact of a federal action but specifies that the reporting requirement should not, necessarily, be used as a threshold.

The BAAQMD adopted thresholds of significance for GHGs in 2017; the threshold is compliance with a qualified GHG reduction strategy or annual emissions less than 1,100 MT of CO₂-e per year or 4.6 metric tons of CO₂-e per service population (residents and employees) per year.

The amount of CO₂-e per year of operation was modeled using CalEEMod. Project emissions are presented in the tables below.

Table 6: Annual GHG Emissions

<table>
<thead>
<tr>
<th>Source</th>
<th>Emissions (MT CO₂-e per year)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Construction¹</td>
<td>4.1</td>
</tr>
<tr>
<td>Area</td>
<td>3.4</td>
</tr>
<tr>
<td>Energy</td>
<td>200.9</td>
</tr>
<tr>
<td>Mobile</td>
<td>450.3</td>
</tr>
<tr>
<td>Waste²</td>
<td>26.2</td>
</tr>
<tr>
<td>Water</td>
<td>26.9</td>
</tr>
<tr>
<td>Total</td>
<td>711.7</td>
</tr>
</tbody>
</table>

¹ Construction Emissions amortized over 30 years, the assumed lifetime of the project
² Assumes waste diversion of 50 percent

Source: CalEEMod 2016 Version 2016.3.1, Annual Emissions, Table 2.2 “Overall Operational-mitigated”

As shown in the table above, GHG emissions associated with development would be approximately 712 MT CO₂-e per year, which would be less than three percent of the CAA reporting limit of 25,000 MT per year; project-level GHG emissions would also be less than the BAAQMD threshold of 1,100 MT CO₂-e of per year. Therefore, the project would not have a substantial effect on global GHG emissions and climate change.

Additionally, these emissions would occur in the jurisdiction of the City and County of San Francisco. San Francisco’s Strategies to Address Greenhouse Gas Emissions identifies the City’s actions to pursue cleaner energy, energy conservation, alternative transportation, and solid waste policies, and concludes that the City’s policies have resulted in a reduction in greenhouse gas emissions below 1990 levels. The local air district (BAAQMD) reviewed San Francisco’s Strategies to Address Greenhouse Gas Emissions and concluded that the strategy meets the criteria for a Qualified GHG Reduction Strategy. Therefore, GHG emissions would be further reduced below those estimated in the tables.

Source List: 18, 53
Additional Studies Performed

- Phase I Environmental Site Assessment (ESA), June 14, 2016, Langan Treadwell Rollo.
- Phase II ESA, November 28, 2016. Langan Treadwell Rollo
- Geotechnical Investigation – 500 Turk Street. December 12, 2016. Langan Engineering and Environmental Services, Inc.

Field Inspection (Date and completed by):

Field Inspection - November 15, 2017. Completed by Ben Welsh, Associate Environmental Planner, Rincon Consultants, Inc.

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


San Francisco Planning Department. Initial Study – 500 Turk Street Project. Planning Department Case No. 2016-010340ENV.


Rincon Consultants Site Visit/Field Observation. Project site visited November 15, 2017 by Ben Welsh, Associate Environmental Planner for Rincon Consultants Inc.


45 San Francisco Planning Department. March 2017. Transportation Study Determination Request – Case No. 2016-010340ENV, 500 Turk Street.


54 City and County of San Francisco. January 2007. Programmatic Agreement by and among the City and County of San Francisco, the California State Historic Preservation Officer, and the Advisory Council on Historic Preservation Regarding Historic Properties Affected by Use of Revenue from the Department of Housing and Urban Development Part 58 Programs.


65 City of San Francisco Planning Department. San Francisco General Plan. Individual elements accessible online: [http://generalplan.sfplanning.org/](http://generalplan.sfplanning.org/)

**ATTACHMENTS**

A. Air Quality and Greenhouse Gas Data and Modeling Results
B. Phase I and Phase II Environmental Site Assessments
C. Historic and Cultural Resource Documentation
D. Sound Level Measurement Data - HUD DNL Calculator Results, November 2017
E. Geotechnical Investigation

**List of Permits Obtained:**

**Public Outreach [24 CFR 50.23 & 58.43]:**

Community meetings were held on July 19 and October 18, 2017 and April 11, 2018. A majority of the comments received on the project were supportive.

**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. Furthermore, the environmental and social impacts of potential future development on-site have been evaluated as part of the project. Therefore, the project would not result in additional cumulative impacts from future related actions.

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

The DEIR analyzed and considered three alternatives to the proposed project as discussed below (No Project/No Action, Full Preservation, and Partial Preservation).

**Offsite Alternative:**

The consideration of an offsite alternative is not warranted because the project would involve development of an apartment building on the specific site being studied. 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.
Partial Preservation Project:
The existing building would be retained in its entirety with a new one-story addition on the Turk Street Wing and new seven-story building would be constructed in the open portion of the lot to the north. A total of 32 residential units and approximately 4,079 sf of commercial space would be developed. This would result in a reduced impact compared to the proposed action, as the historic building would be retained. Although reduced impacts would occur, the partial preservation project would not support the City’s goals of increasing affordable housing units to the same degree as the proposed action.

Full Preservation Project:
The existing building would be retained and a new seven-story building would be constructed in the open portion of the lot to the north, with five to six story rooftop additions over the existing Larkin and Turk street wings. A total of 45 residential units and approximately 2,850 sf of commercial space would be developed. This would result in a reduced impact compared to the proposed action, as the historic building would be retained. Although reduced impacts would occur, the project would not support the City’s goals of increasing affordable housing units to the same degree as the proposed action.

No Action Alternative [24 CFR 58.40(e)]:
If the proposed action were not implemented, the project site would continue to include an automobile repair shop and 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 ending chronic homelessness and increasing the availability of affordable housing units specifically for families. In addition, the existing contamination on site would remain.

Summary of Findings and Conclusions:
The proposed action involves demolition of an existing automobile repair shop and construction of a nine-story building with 107 affordable apartment units and one manager’s unit in the East area of San Francisco. The project site is bordered by a mix of institutional, commercial, and residential buildings, as well as vacant space.

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.

The project site also has soil contaminated with heavy metals, and due to the age of the building on site, may contain asbestos containing materials and lead based paint. The disturbance during construction could result in exposure to these contaminants. Therefore, the proper disposal of any soil-based contaminants or hazardous materials is required as mitigation.

The project site is suitable from a geotechnical standpoint; however, site specific recommendations from the Geotechnical Investigation are necessary prior to development. These recommendations pertain to the site’s geotechnical concerns which include static and seismic settlement, the presence of weak deposits, and soil corrosivity. These recommendations are required as mitigation.
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 MOA 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 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 is 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 low-income 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.
<table>
<thead>
<tr>
<th>Law, Authority, or Factor</th>
<th>Mitigation Measures and Conditions</th>
</tr>
</thead>
<tbody>
<tr>
<td>Contamination and Toxic Substances</td>
<td><strong>Site Mitigation Plan and Health and Safety Plan.</strong> A Site Mitigation Plan (SMP) and a Health and Safety Plan (HASP) shall be submitted to the SFPDH prior to the issuance of any permits. The SMP shall contain contingency plans to be implemented during soil excavation activities. In addition, the SMP shall include a site-specific HASP which will address hazards that may be encountered by on-site workers during remediation activities and will describe the steps necessary to minimize exposure of the public to potentially impacted soil and to physical hazards originating from soil excavation and disposal activities. The HASP will outline proper soil handling procedures and health and safety requirements to minimize worker and public exposure to hazardous materials during construction.</td>
</tr>
</tbody>
</table>
| Noise Abatement and Control | **Construction Noise Reduction.** Project construction activity shall 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 will require a permit from the City. Furthermore, construction contractors for the project shall implement appropriate noise reduction measures, as determined by the City during the construction permit approval process. Required noise reduction measures 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.**  
**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 Ldn 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) 27 or higher. |
| Soil Suitability/ Slope/ Erosion/ Drainage/ Storm Water Runoff | **Geotechnical Recommendations.** The project proponent shall incorporate all conclusions and recommendations included in the Geotechnical Investigation prepared by Langan, Treadwell, and Rollo, dated December 21, 2016. These recommendations include, but are not limited to:  
  * The proposed building shall be supported on a mat bearing on improved ground, and localized areas of bearing pressures shall not exceed the allowable bearing capacity provided by the improved ground. The mat foundation shall be designed to span between ground improvement columns/elements.  
  * A qualified, design-build, specialty contractor, who has previously successfully performed ground improvement in similar subsurface soil conditions, shall design and perform the ground improvement to support the structural loads with acceptable settlement and to factors of safety as discussed in the Geotechnical Investigation. In addition, the contractor shall design the ground improvement system, including the type of improvement used and the size and spacing of the elements, to adequately mitigate the cyclic densification potential. |
Historic Preservation

The project would be required to comply with the terms of the Project Programmatic Agreement Between the City and County of San Francisco and the California State Historic Preservation Officer Regarding 500 Turk Street Affordable Housing Development, San Francisco, CA, October 15, 2018.

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: [Signature]
Date: October 18th, 2018

Name/Title/Organization: Matthew Long, Environmental Planner, Rincon Consultants, Inc.

Certifying Officer Signature: [Signature]
Date: 10/29/18

Name/Title: Kate Hartley, Director, MOTED

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).