ADDENDUM TO MITIGATED NEGATIVE DECLARATION

Date of Publication of Addendum: November 3, 2008

Date of Final Mitigated Negative Declaration: May 18, 2004

Lead Agency: San Francisco Redevelopment Agency
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Project Title: Western Addition A-2 Redevelopment Plan Amendment
SFRA File No.: 10.0 1.08 (Planning Department Case No. 2002.0211E)

Project Sponsor: San Francisco Redevelopment Agency

Assessor's Blocks and Lots: Block 756, Lot 1 (portion); Block 768, Lot 13
City and County: San Francisco

Determination:

This Addendum to the final Mitigated Negative Declaration ("MND") for the Western Addition A-2 Redevelopment Plan Amendments adopted on May 18, 2004 (hereafter referred to as "Original Project") evaluates whether modifications to the Redevelopment Plan (hereafter referred to as "Modified Project") for two of the locations evaluated in the Original Project, the Muni substation at Turk and Fillmore Streets (Block 756, a portion of Lot 1) and the former Freeway Parcel C at Golden Gate Avenue and Franklin Street (Block 768, Lot 13), would result in any new or substantially more adverse significant effects or require any new mitigation measures not identified in the final MND. The Modified Project would differ from the Original Project at the Muni substation site in that the overall square footage of non-residential space would be increased by up to 12,500 square feet (if a portion of the Fillmore-Turk Mini-Park is built upon for addition to the substation). The Modified Project would be similar to the Original Project at the Parcel C site, maintaining the same number of residential units and slightly increasing the size of nonresidential space but eliminating the restaurant component. Based on the analysis in this Addendum, the analyses conducted and the conclusions reached in the MND issued on May 18, 2004 remain current and valid. The proposed revisions to the project would not cause new significant impacts not identified in the MND, and no new mitigation measures would be necessary to reduce significant impacts. No changes have occurred with respect to circumstances surrounding the proposed project that would cause significant environmental impacts to which the project would contribute considerably, and no new information has become available that shows that the project would cause significant environmental impacts not already analyzed in the MND. Therefore, no further environmental review is required beyond this addendum.

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

Stanley Muraoka
San Francisco Redevelopment Agency

November 3, 2008
Date of Determination
Background

The San Francisco Redevelopment Agency Commission adopted the final Mitigated Negative Declaration for the Western Addition A-2 Redevelopment Plan Amendments on May 18, 2004. The MND analyzed five changes in the plan, which were to: 1) permit affordable senior housing at a greater density than is currently permitted on four sites; 2) reduce the amount of parking required for senior housing on those sites; 3) increase the height limit on two sites formerly occupied by the Central Freeway; 4) provide for a non-residential density bonus for mixed-use development as part of a mixed-use project, and 5) provide for a non-residential density bonus for mixed-use development involving rehabilitation of designated historic resource(s) within the Plan area.

The Plan amendments evaluated in the MND were to facilitate development of senior housing at four sites, a mixed residential and commercial project, on Fillmore Street between Eddy and Ellis Streets, and renovation of a former Municipal Railway electrical substation at the southeast corner of Fillmore and Turk Streets along with construction of affordable housing on adjacent land to the east on Turk Street.

The two senior housing sites formerly occupied by the Central Freeway proposed in the Original Project are located at Turk and Gough streets and at Franklin Street and Golden Gate Avenue. Development rights on Parcel A (at Turk and Gough) were awarded to a private nonprofit developer whose design concept included the construction of 106 units – 50 studio and 56 one-bedroom units – comprising 268 Agency Rooms, or approximately 1.8 Agency Rooms per 100 square feet. The proposed density and height were less than permitted by the Plan amendments due to limitations imposed on the site by its close proximity to Margaret Hayward Playground and Jefferson Square. This component of the Original Project has been completed and is occupied. Development rights for the Parcel C site, at the corner of Franklin Street and Golden Gate Avenue, were awarded to another private developer whose plan included 104 units – 28 studios and 76 one-bedroom units – comprising 284 Agency Rooms, or approximately 1.9 Agency Rooms per 100 square feet. This component of the Original Project has not been built.

The other two senior housing sites (Rosa Parks Annex 1 and Annex 2) proposed in the Original Project are located on the block occupied by the 198-unit Rosa Parks senior housing complex, property owned by the San Francisco Housing Authority. The Rosa Parks site is bounded by Webster, Turk and Buchanan Streets and Golden Gate Avenue. The Original Project consisted of the construction of two new buildings adjacent to the existing Rosa Parks senior housing building. This component of the Original Project has not been completed.

The Original Project reduced the required amount of off-street parking for affordable senior housing at all four sites, from one space per two units to one space per five units.

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1 All residential densities in the Redevelopment Plan are expressed in terms of “Agency Rooms,” rather than units. The Plan defines an Agency Room as including a living room, dining room, kitchen, family room, study, den, library, bedroom, or similar major room, but not including bathrooms, closets, hallways, or similar rooms. By Agency practice, a studio is considered two Agency Rooms, while a one-bedroom apartment is considered three Agency Rooms.

2 In San Francisco, Proposition K limits shading by new buildings in excess of 40 feet tall.

3 The Redevelopment Agency issued a new request for developer proposals for this site in July 2008 after previously selected developers were unable to complete this development.

4 The existing Rosa Parks housing complex was not affected in the Original Project and would not be affected in the Addendum.
The Original Project also included development on Parcels 732-A and 725-C (also referred to as the “Jazz Center site”) of approximately 80 market-rate residential units and approximately 53,900 square feet of non-residential space, housing a jazz club, jazz heritage center, restaurant, banquet/meeting hall and office space. This component of the Original Project has been completed and is occupied.

The Muni substation site was intended for the rehabilitation and reuse of the former substation (City Landmark No. 105) and for the construction of affordable residential units on the vacant eastern part of that site. The Muni substation site occupies 33,000 square feet at the southeast corner of Fillmore and Turk Streets. The vacant former substation building is located on approximately 6,000 square feet at the corner of Fillmore and Turk; the remainder of the site is vacant. This component of the Original Project has not been undertaken.

Figure 1 depicts the Original Project and the various site locations.

As noted, since completion of the MND for the Original Project, development on the following sites has been completed:

- The residential tower and non-residential space (including Yoshi’s jazz club and restaurant) on parcels 725-C and 732-A
- The senior housing building on Parcel A

As of the publication date of this Addendum, the Original Project components on Parcel C, the Rosa Parks block, and the Muni Substation Site remain undeveloped. Application for a revised project on the Rosa Parks site has been submitted to the San Francisco Planning Department. This project would contain the same approximately 100 senior housing units, but in a different configuration on the Rosa Parks site.

This project is anticipated to be considered by the San Francisco Planning Commission at some point in 2009, after the termination of the Western Addition A-2 Redevelopment Plan, on January 1, 2009. Details of the design of this project are not known.

**Purpose of Addendum**

The purpose of this Addendum to the Original Project MND is to evaluate whether modifications to the Redevelopment Plan (hereafter referred to as “Modified Project”) for two of the locations evaluated in the Original Project, the Muni substation at Turk and Fillmore Streets (Block 756, a portion of Lot 1) and the former Freeway Parcel C at Golden Gate Avenue and Franklin Street (Block 768, Lot 13), would result in any new or substantially more adverse significant effects or require any new mitigation measures not identified in the final MND. The focus of analysis in this Addendum is on the Muni substation, since development on Parcel C is currently proposed to be similar to that previously approved (i.e., approximately 100 units of senior housing). Because the transportation analysis prepared for the MND assumed a small (approximately 1,000 square feet) restaurant space on Parcel C that is no longer proposed (the current proposal for Parcel C anticipates provision of supportive senior services on-site but no restaurant), the current project at Parcel C is anticipated to generate less traffic and other transportation impacts than previously assumed.
Although modification of the original Rosa Parks site project component is not part of the Modified Project analyzed herein, effects of revised development at that site are considered as part of the cumulative analysis in this Addendum.

CEQA FRAMEWORK FOR ADDENDUM

Section 15162 of the State CEQA Guidelines provides that no subsequent Negative Declaration shall be prepared unless the proposed modifications to the project or changes in the circumstances under which the project is undertaken would require major revisions to the original Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects, or unless newly available information reveals a new or substantially more severe significant impact or a new or newly feasible mitigation measure or alternative that would reduce significant impact(s), but that the project sponsor declines to implement.

Chapter 31, Section 31.19(c)(1) of the San Francisco Administrative Code states that a modified project must be reevaluated and that, “If, on the basis of such reevaluation, the Environmental Review Officer determines, based on the requirements of CEQA, that no additional environmental review is necessary, this determination and the reasons therefore shall be noted in writing in the case record, and no further evaluation shall be required by this Chapter.” Although the Administrative Code does not apply to the San Francisco Redevelopment Agency (“Agency”), the Agency generally follows Chapter 31 of the Administrative Code.

Summary of Original Project

The Agency had intended to partner with one or more developers to rehabilitate the former Muni substation (City Landmark No. 105) and to construct affordable residential units on the unoccupied eastern portion of the site. The substation building, with the proposed density bonus, would have accommodated up to 9,500 square feet of retail use. Uses for the new building were to include art, cultural, entertainment and community-focused activities. The Original Project would have retained the building height and general density, but would have installed a partial mezzanine level to accommodate a portion of the new uses. The existing substation building is a single-story structure with a roughly 6,000-square-foot basement.5

For the adjacent lot that occupies the eastern portion of the Muni substation site, the Agency proposed the development of a four-story residential building consisting of approximately 32 residential units, designated as “affordable” units, of which all but four would be two- and three-bedroom units (136 Agency Rooms, or 1.0 Agency Room per 100 square feet of lot area). Parking for the residential building was proposed at the required ratio of one space per unit. There are no existing parking spaces within the former Muni substation; however, approximately 30 spaces would have been provided on the adjacent lot for the proposed commercial uses.

5 The basement is part of the building floor area, but not considered a separate use; it would have been used as a storage area for the retail tenant.
The Muni substation proposal was approved in 2004, but no development has occurred there. The proposal to construct the residential units was approved and construction is due to begin in the spring of 2009.

As stated previously, the Original Project proposed 104 units for Parcel C. The Original Project design proposal included a courtyard, residential lobby and sitting area, and about 5,000 square feet of space for program uses. The design proposal also included an approximately 1,000-square foot café/service center, specifically designed to serve the needs of seniors.

Parcel C is currently utilized as a surface parking lot, as was the case during the MND.

**Summary of Modified Project**

The Agency now proposes that the Muni substation be rehabilitated and developed with roughly 18,000 square feet of non-residential space, which is assumed to include youth support services and some office space during the daytime hours and theater/supper club uses in the evening. Also, an addition to the substation may be constructed on a portion of the Fillmore-Turk Mini-Park, which is directly adjacent to and south of the Muni substation. The Mini-Park would otherwise not change. This additional area would bring the total square footage of the substation component to a maximum of 22,000 square feet.

Preliminary schematic designs prepared for the Redevelopment Agency for several reuse options for the Muni substation indicate that the principal Turk and Fillmore Street elevations of the building would not be altered and the overall building envelope would remain the same or, under some design options, be expanded vertically and/or horizontally to accommodate theater use, including a fly loft for the stage.

The development on Parcel C would be similar to that previously approved, with the same number of senior residential units as the Original Project and a small increase (about 1,700 square feet) in the overall square footage of nonresidential space, but without the café component. Instead, all nonresidential space would be devoted to supportive services for residents, including a medical examination room, a social event space, staff office space, and the like.

**Comparison of Original and Modified Project**

The Modified Project would differ from the Original Project at the Muni substation site in that the overall square footage of non-residential space would be increased by up to 12,500 square feet (if a portion of the Fillmore-Turk Mini-Park is built upon for addition to the substation). The proposed uses for the non-residential space in the Modified Project would generally remain the same as the Original Project.

As stated above, the Modified Project would be similar to the Original Project at the Parcel C site, maintaining the same number of residential units and slightly increasing the size of nonresidential space but eliminating the restaurant component.
Analysis of Potential Environmental Effects

1. Land Use

The MND found that the Original Project would have no substantial effect upon the character of the area or conflict with any existing land uses in the vicinity of the project sites.

The project sites are within the jurisdiction of the Agency and are subject to the requirements and standards of the Western Addition A-2 Redevelopment Plan (“Redevelopment Plan”) and not to the San Francisco Planning Code or Zoning Maps. Project expansion activities are subject to review by the Agency, which requires new development to be consistent with the City’s General Plan and the Redevelopment Plan.

Land uses near the Muni substation site include the Northern District Police Station to the west, Fire Station No. 5 to the east, and mixed-use commercial and residential buildings to the north. A small, 10,000 square foot park (the Fillmore-Turk Mini-Park) abuts the former Muni substation to the south, and south of the park is a McDonald’s restaurant. Several churches are in the project vicinity, including the El Bethel Baptist Church at Golden Gate Avenue and Fillmore Street, southeast of the Muni substation site.

Land uses near the Parcel C site consist of institutional, residential, office and commercial uses. Some buildings contain mixed uses, such as the Opera Plaza across the Golden Gate/Franklin intersection from Parcel C. The John Swett Elementary School is adjacent to Parcel C on the west and the Edmund G. “Pat” Brown State Office Building is across Franklin Street east of the site. A surface parking lot is south of and directly adjacent to Parcel C.

The Modified Project would be consistent with existing residential and community facility uses at the Muni substation and Parcel C, and in the surrounding neighborhood. Although the square footage of the proposed nonresidential area at the Muni substation site would be greater than that of the Original Project, the uses proposed would be similar and would remain compatible in both nature and scale with surrounding and nearby uses.

The Modified Project would be compatible with the existing residential and community facility uses and in the surrounding area, and would be consistent with the existing land use designation for the Muni substation and Mini-Park sites of Commercial, Community Shopping (“CC”) and with the land use designation for Parcel C – Commercial, General – Intermediate Density (“CI”).

While the Modified Project would represent a physical change to the area and intensification of use on the Muni substation project site, it would consist of infill nonresidential development at this site. Therefore, the Modified Project would not disrupt or divide the physical arrangement of the community. The project would be compatible and consistent with existing development in terms of the proposed uses and the scale of the development, and surrounding uses and activities would be able to continue without significant disruption.

There would be no substantial change in land uses from those proposed under the Original Project, either at the Muni substation site or on Parcel C, nor on the Rosa Parks site.
Like the Original Project, the Modified Project would not obviously or substantially conflict with the policies and objectives of the San Francisco General Plan.

In light of the above, the Modified Project would not have substantially greater effects than the Original Project, with respect to land use, nor would the Modified Project result in new significant land use effects.

2. Visual Quality

The MND found that the Original Project would not adversely affect the existing visual character or quality of the site and its surroundings, and would result in less-than-significant impacts with regard to light or glare.

In terms of visual quality, the Modified Project would differ from the Original Project in that the Modified Project at the Muni substation site would develop a greater amount of floor area to accommodate nonresidential uses (e.g., youth services, office space and entertainment uses). As stated above, the proposed development for nonresidential space at the Muni substation would increase from 9,500 square feet to a maximum of 22,000 square feet. This increase would not, however, substantially alter the building envelope, as most, if not all (depending on the ultimate design) of the additional space would result from interior alterations such as the addition of a mezzanine and reuse of the basement. Therefore, the Modified Project would not result in substantial changes in visual effects, including changes in scenic views, relative to reuse of the Muni substation, compared to the Original Project.

Like the Original Project, the Modified Project would rehabilitate and reuse the former Municipal Railway substation, a brick building that is a City Landmark, but currently in disrepair. The building appearance is generally run down, with missing windows and a green, mossy residue on its exterior walls where downspouts have failed. The Modified Project would rehabilitate the substation, which would enhance the overall visual quality of the Muni substation site. The adjacent new residential building, which was proposed in the Original Project and has been approved by the Agency, will be constructed within the existing 50-foot height limit on the adjacent lot. The building design would comply with existing height and bulk restrictions for the site, which would ensure that the residential building would not result in view blockage.

The design of the new building area at the Muni substation would be subject to review and approval by the Redevelopment Agency Commission, which would help to ensure that the project designs are contextually appropriate. The Modified Project would consist of infill development at a relatively limited scale; therefore, the effect of the project on the existing visual character of the site and its surroundings would be considered less than significant. If the Muni substation were to be expanded into a portion of the Mini-Park, it is anticipated that the footprint of this expansion would be relatively small. This potential expansion of the substation building, were it to occur, would extend about one-fourth of the way (about 16 feet) into the approximately 60-foot-wide Mini-Park for about half of the 155-foot length of the Mini-Park, and thus would alter the visual character of the Mini-Park, although not to a degree that would substantially degrade the park’s visual character or obstruct scenic views. Moreover, as stated above, the

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6 Because the overall development on Parcel C would be similar to that previously proposed in scale and character, it can be fairly assumed that visual impacts of the Modified Project would be similar to those of the Original Project. Likewise, no substantial change in visual impact are anticipated as a result of the revised senior housing proposal at the Rosa Parks site.
rehabilitation of the Muni substation landmark building would enhance the aesthetic nature of the area, which can be said to have a beneficial impact on the site and its surroundings.

The Modified Project would increase the amount of light emitted from the development site, but would not increase ambient light levels in a manner that would be substantially disruptive or that would be in excess of typical lighting conditions in the surrounding area. As with the Original Project, the Modified Project would not substantially increase ambient light levels in the project vicinity and would not produce obtrusive glare that would substantially affect other properties.

In light of the above, the Modified Project would not result in substantially greater visual impact than originally proposed in the MND, and therefore impacts with respect to visual quality would be less than significant.

3. Transportation and Circulation

The MND found that the Original Project would not result in significant effects with respect to traffic, transit, parking and loading, pedestrian and bicycle conditions, or construction. The MND evaluated traffic impacts at five intersections (Fillmore Street / Geary Boulevard, Fillmore Street / Eddy Street, Fillmore Street / Turk Street, Franklin Street / Turk Street, and Gough Street / Turk Street), all of which operated at level of service (LOS) B in the p.m. peak hour under existing conditions.7 Under existing-plus-project conditions, four of the five study intersections would remain at LOS B, while the intersection of Franklin / Turk Streets would degrade to LOS C, which would still be acceptable. Thus, no significant traffic effects were identified. Under cumulative (2020) conditions, the Franklin / Turk Streets intersection would degrade to LOS D, while the other four intersections would operate at LOS B or C. Therefore, no cumulative impact was identified.

To determine whether traffic conditions had changed since the MND was completed, new traffic counts were conducted at the five study intersections, plus a sixth intersection, Laguna and Turk Streets.8 The counts revealed that, under 2008 conditions (including completion, occupancy, and operation of the Original Project components at the Jazz Center site and on Parcel A), all six intersections operate at LOS B and would continue to operate at LOS B with the addition of traffic from the remaining, not-yet-built components of the Modified Project (the Muni substation and Parcel C),9 as well as the residential building adjacent to the Muni substation and senior housing at the Rosa Parks site. (Combined, the Modified Project and the other unbuilt components of the Original Project would add no more than 50 vehicles to any intersection in the peak hour.) Thus, the Modified Project would not result in any new or more severe traffic impacts than the Original Project. In terms of cumulative impacts, the MND evaluated cumulative traffic conditions conservatively assuming a growth rate in traffic volumes of one percent per year. The EIR for the Market and Octavia Plan found that, for 12 intersections that would operate at an unacceptable LOS E or F in the future, traffic growth would be less than one percent per year.

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7 Traffic operations at intersections is described by the concept of level of service (LOS), which indicates an intersection’s performance based on the average stop delay per vehicle. LOS A indicates free flow or excellent conditions with short delays, while LOS F indicates congested or overloaded conditions with extremely long delays. LOS A, B, C, and D are generally considered acceptable service levels, while LOS E and LOS F are unacceptable.

8 Traffic counts conducted Wednesday, August 13, 2008.

9 The Muni substation was analyzed in the Modified Project as encompassing 7,500 sq. ft. of office space, 7,500 sq. ft. of restaurant space, and a 350-seat capacity theater (cinema trip generation rate assumed).
year (except at two intersections on the new Octavia Boulevard, where traffic growth would be substantially greater than one percent per year because of the new boulevard). Therefore, the cumulative analysis in the MND was appropriately conservative and because it identified no cumulative significant impacts, the Modified Project would likewise result in no cumulative significant impacts.

The Modified Project would incrementally increase transit ridership and parking and loading demand, compared to the Original Project (because of the increase in floor area of the Muni substation component, but not to the degree that would be expected to result in noticeably different effects. Therefore, these impacts would remain less-than-significant, as with the Original Project, as would pedestrian and bicycle impacts. Construction impacts would be similar to those of the Original Project, given the similar nature and scale of development proposed under the Modified Project; these impacts, like those of the Original Project, would be less than significant.

In summary, the Modified Project would not result in any new or substantially more severe transportation effects than the Original Project, and all transportation impacts would be less than significant.

4. Population

The MND found that the Original Project would not result in a significant effect upon population.

The Muni substation project would increase the non-residential population on its now undeveloped site. Although the project would increase the size of the development floor area, the anticipated visitor and employee increase as a result of the youth services, office space, and entertainment uses would not create substantial new employment-based housing demand, because the proposed uses are anticipated to be primarily oriented towards existing residents and other members of the local community.

The senior housing component of the Modified Project on Parcel C would be developed as essentially the same program as in the Original Project. Likewise, the Rosa Parks site would also be developed with the same number of senior housing units as in the Original Project.

Thus, there would be no substantial change in anticipated population increases from the MND for the Modified Project, which would, therefore, not result in any new or substantially more severe impacts than the Original Project.

5. Noise

The MND found that, because the Original project would not cause a doubling in traffic volumes, the project would not cause a noticeable increase in the ambient noise level in the project vicinity, and traffic noise therefore would not be significant. This conclusion would remain the same with the Modified Project, which would generate very similar traffic volumes. The MND likewise found that operational noise, whether from building mechanical equipment or from proposed entertainment uses, would not result in significant impacts, and this conclusion would also remain applicable to the Modified Project, as would the MND’s conclusion that existing noise regulations would avoid any significant effect of ambient noise on project residents, including, cumulatively, residents at the Rosa Parks site.
The MND found that construction noise impacts would be less than significant, because all construction activities would be conducted in compliance with the San Francisco Noise Ordinance (Article 29 of the San Francisco Police Code), and because, in the event that pile-driving were required, the Redevelopment Agency would implement mitigation to require that contractors schedule pile driving activity for times of the day that would minimize disturbance to neighbors. Mitigation Measure No. 1, p. 15, remains applicable to the Modified Project.

In summary, the Modified Project would not result in new or substantially more severe noise impacts, and noise impacts of the Modified Project would be less-than-significant, as with the Original Project.

6. Air Quality

The MND found that the vehicle emissions of criteria pollutants of concern (hydrocarbons, nitrogen oxides, and particulate matter) for the Original Project would not exceed applicable Bay Area Air Quality Management District (“BAAQMD”) thresholds for significance. The incremental increase in square footage of development at the Muni substation site would not result in a substantial increase in emissions for the Muni substation site or for the Parcel C site, nor would there be any increase in cumulative emissions at the Rosa Parks site, compared to emissions forecast in the MND. Therefore, project effects related to operational air quality would not be significant, and the Modified Project would not result in any new or more severe air quality impacts, compared to the Original Project. Mitigation Measure 2 from the MND (p. 15) would remain applicable to the Modified Project, and would avoid any potentially significant air quality effects related to construction.

Increased residential and nonresidential development at Parcel C and the Muni substation site, as well as at the Rosa Parks site with cumulative development, would generate greenhouse gas (“GHG”) emissions as a result of traffic increases (mobile sources) and commercial operations associated with heating, energy use and solid waste disposal (area sources). However, the very limited scale of the Modified Project means that it would not contribute significantly to global climate change such that would impede the State’s ability to meet its GHG reduction targets under AB 32, or impede San Francisco’s ability to meet its GHG reduction targets under the Greenhouse Gas Reduction Ordinance. Moreover, San Francisco has implemented programs to reduce GHG emissions specific to new construction and current and probable future state and local GHG reduction measures will likely reduce a project’s contribution to climate change. Therefore, the Modified Project would not contribute significantly, either individually or cumulatively, to global climate change.

Shadow

The Modified Project at the Muni substation site would result in, at most, an incremental change to the physical envelope of the former Muni substation. Nevertheless, because the Muni substation is immediately adjacent to the Fillmore-Turk Mini-Park, if a development option is selected that would increase the building envelope, either as to height or width, the project would cast new shadow on the mini-park. Although the project would not be expected to result in a significant impact with regard to shadow, Section 295 of the San Francisco Planning Code requires that a determination as to the project’s shadow effect be made by the Planning Commission, following receipt of comment from the general manager of the Recreation and Park Department and the Recreation and Park Commission.
The MND found that the senior housing buildings on Parcel A (constructed) and Parcel C (not built; part of the Modified Project) would cast new shadow on both Jefferson Square and Hayward Playground, parks protected by Section 295 of the Planning Code. However, because of the limited additional new shadow and the fact that new shadow would occur early in the morning (before about 10:30 a.m. in winter and before about 9:30 a.m. in summer), the MND found that the impact would be less than significant. The Planning Commission, on the advice of the Recreation and Park Department and the Recreation and Park Commission, also found that the shadow impact would be less than significant under Planning Code Section 295. Because no change is proposed under the Modified Project in the massing of the senior housing building on Parcel C, the Modified Project would not result in any new or substantially more severe shadow impacts, compared to the Original Project.

Wind

The MND evaluated ground-level wind conditions in connection with the Jazz Center project component, which was—and remains—the only building as part of the Original or Modified Project tall enough to potentially result in adverse wind effects. The MND found that the project on the Jazz Center site would not result in wind speeds newly exceeding the Planning Code’s 36-miles-per-hour standard for winds judged to be hazardous, and therefore the Original Project would result in less-than-significant wind impacts. Because the building on the Jazz Center site is complete and because the Modified Project proposes no changes in building heights that could result in adverse effects on ground-level winds, the Modified Project would likewise have less-than-significant wind impacts.

7. Utilities/Public Services

The MND found that the Original Project would not be expected to have a measurable impact on public services and utilities.

Utilities and public services are already provided in the project vicinity. The Modified Project would incrementally increase demand for and use of public services and utilities on each site, but the demand would not substantially exceed that of the Original Project.

Thus, like the Original Project, the Modified Project would not be expected to have a significant impact on public services or utilities.

8. Biology

The MND found that the Original Project would not have an adverse impact on biological resources in the project area.

The Muni substation site is largely covered by the former substation and undeveloped space. A mini-park is directly adjacent to and south of the Muni substation on the corner of Fillmore and Turk Streets. The Modified Project would allow for the construction of an addition to the substation at the Mini Park.

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10 Because Parcel A is immediately across Gough Street from both parks, the building on that site was found to result in substantially greater shadow impacts than the building proposed for Parcel C.
location, which would alter part of the current vegetation but would otherwise maintain most of the vegetative landscaping on the site.

There are no special status plants on the project sites and the Modified Project would be located in an already highly developed urban area. The Modified Project would not affect any threatened, rare, or endangered animal or plant life or habitat, nor would it interfere with any resident or migratory species.

In light of the above, there would be no changes in biological impacts from the Original Project.

9. Geology/Topography

The MND found that the Original Project would not result in a significant effect related to geology.

Like the Original Project, the Modified Project is located in an area that is subject to ground movement from earthquakes along the San Andreas, Northern Hayward Faults and other faults in the San Francisco Bay Area. However, because the project sites are not located in an area of potential liquefaction or in an area subject to landslides, and because the topography of the project sites would not be altered, the Modified Project, like the Original Project, would not result in a significant effect related to geology. Under the Modified Project, as with the Original Project, the unreinforced masonry Muni substation building would be rehabilitated, including seismic retrofitting, which would reduce the risk to building occupants in an earthquake, compared to existing conditions.

Consistent with the MND analysis, the project sponsor would obtain geotechnical report(s) for the development site prior to the approval of the building permit(s) and would follow the recommendations of the report.

10. Water

The MND found that the Original Project would not measurably affect current runoff or groundwater within the project area.

Because the Muni substation site is largely covered by the former substation and undeveloped but largely impervious land, the substation site would not substantially change the amount of impervious surface area and would thus not affect current runoff or groundwater.

There would be no change in affects to runoff or groundwater from the Original Project. Therefore, impacts to water resources would be less than significant.

11. Energy/Natural Resources

The MND found that the effects related to energy consumption from the Original Project would not be significant.

The Modified Project would meet current state and local codes concerning energy consumption, including Title 24 of the California Code of Regulations. Moreover, in light of the City’s recently adopted Green
Building Ordinance, energy use from future new development will be reduced, compared to what would otherwise have been consumed.

There would be no change in the effects related to energy consumption from the Original Project.

12. Hazards

The MND found that the Original Project would not have significant impacts related to hazards.

Although the former Muni substation project site is not listed on the State of California Hazardous Waste and Substances List compiled pursuant to Government Code Section 65962.5, the Redevelopment Agency would require preparation of a Phase I environmental site assessment for the Modified Project prior to the approval of final building plans (see Mitigation Measure 5, p. 16).

The Redevelopment Agency would also require remediation, as applicable, in accordance with the findings of the Phase I site assessment, prior to the occupancy of the Modified Project. Remediation of contaminated soil and groundwater and of hazardous building materials, if present, is strictly regulated by federal, state, and local law and regulations (see Mitigation Measure 3, p. 16).

Because the Modified Project would be the same as the Original Project with respect to hazards, it would also have no significant impacts.

13. Cultural

As indicated in the MND, the Muni substation is City Landmark No. 105, and is therefore a historical resource for purposes of CEQA analysis. To ensure that the project would not result in a significant impact on this historical resource, the MND included Mitigation Measure No. 7, p. 21, which would require that the Redevelopment Agency approve a reuse plan for the former Muni substation that would be consistent with the Secretary of the Interior’s Standards or, alternatively, would ensure that the project would not “cause a substantial adverse change in the significance of an historical resource” within the meaning of CEQA Section 21084.1 and Section 15064.5(b)(1) of the state CEQA Guidelines. This mitigation measure remains applicable to the Modified Project, and would preclude new or substantially more severe effects on historical resources. Preliminary schematic designs prepared for the Redevelopment Agency for several reuse options for the Muni substation indicate that the principal Turk and Fillmore Street elevations of the building would not be altered and the overall building envelope would remain the same or, under some design options, be expanded vertically and/or horizontally to accommodate theater use, including a fly loft for the stage. Because the building is a City Landmark, the Landmarks Preservation Advisory Board would review any proposed design prior to implementation.

No other historical resources would be affected by the Modified Project, as was also the case with the Original Project.

The MND reported that an archival archaeological evaluation found that no prehistoric cultural resources have been previously recorded at the project sites of the Original Project. Research also suggests that the
likelihood of discovering prehistoric remains at the sites is low due to the substantial amount of fill added to the site in the 19th century.\footnote{Archeo-Tec, “Archaeological Research and Treatment Plan: The Western Addition A-2 Redevelopment Project, City and County of San Francisco, California.” January 2004.}

The cultural resources report found less sensitivity at the Muni substation site than the other sites in the Original Project, where minimal excavation (less than six feet) is anticipated and where there was relatively less 19\textsuperscript{th} century development than the other sites. The Muni substation is the only one of the Original Project sites with no documented history of residential use. The area had been occupied by transportation facilities since 1887 and possibly earlier, utilized first for horse-drawn streetcars and later for electric railways.

The report recommends archaeological monitoring during ground-disturbing activities (Mitigation Measure 6, p.17) in designated sensitive areas. Mitigation Measure 6 also addresses the event of an accidental discovery of a cultural resource and the proper subsequent evaluation that would be required to take place.

\textit{Mitigation Measures}

Mitigation measures in the MND were identified that would reduce or eliminate potential environmental impacts of the Original Project. All of these mitigation measures were adopted by the project sponsor and were implemented at the sites that were constructed after approval of the MND. In addition, all applicable mitigation measures to the approved residential development adjacent to the Muni substation will be implemented when construction begins at that site in 2009. Some of the measures would also apply to the Muni substation project modifications and to the senior housing at Parcel C and are indicated as such below. Some measures would also apply to the Rosa Parks site, should that project component subsequently be approved by the Planning Department.

\textit{Mitigation Measure 1 – Construction Noise and Vibration}

The Redevelopment Agency (or the Housing Authority, if applicable) would require the construction contractor(s) to pre-drill pile holes where soil conditions permit, and to use state-of-the-art noise shielding and muffling devices on construction equipment. The Agency (or Authority) would also require that contractor(s) schedule pile driving for times of the day that would be least intrusive and would minimize disturbance to neighbors.

Mitigation Measure 1 \textbf{would} apply to the Modified Project, in the event that pile driving is required.

\textit{Mitigation Measure 2 - Construction Air Quality}

The project sponsor shall require contractor(s) to spray the site with water during demolition, excavation, and construction activities; spray unpaved construction areas with water at least twice per day; cover stockpiles of soil, sand, and other material; cover trucks hauling debris, soils, sand, or other such material; and sweep surrounding streets during demolition, excavation, and construction at least once per day to reduce particulate emissions.
Ordinance 175-91, passed by the Board of Supervisors on May 6, 1991, requires that non-potable water be used for dust control activities. Therefore, the project sponsor shall require that the contractor(s) obtain reclaimed water from the Clean Water Program for this purpose. The project sponsor shall require the project contractor(s) to maintain and operate construction equipment so as to minimize exhaust emissions of particulates and other pollutants, by such means as a prohibition on idling motors when equipment is not in use or when trucks are waiting in queues, and implementation of specific maintenance programs to reduce emissions for equipment that would be in frequent use for much of the construction period.

Mitigation Measure 2 would apply to the Modified Project.

**Mitigation Measure 3 – Soils Testing, Freeway Parcels A and C**

Prior to initiation of any ground-disturbing activities, the Redevelopment Agency shall ensure that soil samples are taken at Parcels A and C. The Agency shall require that the sampling plan be reviewed and approved by the San Francisco Department of Public Health (DPH). Should soils to be excavated on the site(s) be identified to exceed State or federal thresholds as hazardous wastes, the Agency would remove such contaminated soils under proper procedures, and with consultation by DPH, and ensure that such soils are disposed of in an approved landfill. The Agency shall further ensure that, where applicable, all required worker health and safety procedures (including preparation of a Site Health and Safety Plan, if required) are followed during site remediation, if any, and that all hazardous materials removed from the site are properly disposed of in an appropriate disposal facility. Such health and safety procedures and disposal, if required, shall be undertaken by the Agency in consultation with DPH. The Agency Project Manager shall prepare a report for submittal to the Agency Commission and DPH documenting compliance with this measure for the applicable project sites identified in this Initial Study.

Mitigation Measure 3 would apply to the Modified Project with respect to Parcel C.

**Mitigation Measure 4 – Development-Related Remediation, Parcel 732A**

The Redevelopment Agency shall ensure that an appropriate remediation plan, with oversight by the California Department of Toxics Substances Control and the San Francisco Department of Public Health (DPH) as required, is developed and implemented for the Jazz Center site, and that contaminated soils to be excavated are removed under proper procedures and disposed of in an approved landfill. The Agency shall further ensure that, where applicable, all required worker health and safety procedures (including preparation of a Site Health and Safety Plan, if required) are followed during site remediation, if any, and that all hazardous materials removed from the site are properly disposed of in an appropriate disposal facility. Such health and safety procedures and disposal, if required, shall be undertaken by the Agency in consultation with DPH. The Agency Project Manager shall prepare a report for submittal to the Agency Commission and DPH documenting compliance with this measure for the applicable project sites identified in this Initial Study.

Mitigation Measure 4 would not apply to the Modified Project, as development of Parcel 732A has been completed.

**Mitigation Measure 5 – Phase I Environmental Site Assessment**

Where no Phase I environmental site assessment has been prepared (i.e., Rosa Parks Annex site and Muni substation site), prior to approval of building permit(s) an for individual project, the Redevelopment Agency shall ensure that a Phase I environmental site assessment is prepared for each project site (either by the Agency or by the project developer). In the case of the Rosa Parks
Annex site, the responsibility to ensure compliance with this requirement shall rest with the San Francisco Housing Authority. The Agency or Housing Authority, as appropriate, shall ensure that, prior to occupancy of each project, all hazardous materials identified in the Phase I report are properly remediated to residential standards, in accordance with applicable federal, state, and local laws and regulations, and in consultation with the San Francisco Department of Public Health (DPH). The Agency or Authority shall further ensure that, where applicable, all required worker health and safety procedures (including preparation of a Site Health and Safety Plan, if required) are followed during site remediation, if any, and that all hazardous materials removed from the site are properly disposed of in an appropriate disposal facility. Such health and safety procedures and disposal, if required, shall be undertaken by the Agency in consultation with DPH. The Agency Project Manager shall prepare a report for submittal to the Agency Commission and DPH documenting compliance with this measure for the applicable project sites identified in this Initial Study.

Mitigation Measure 5 would apply to the Modified Project with respect to the Muni Substation site.

**Mitigation Measure 6 - Archaeological Resources**

The project sponsor shall distribute the Planning Department’s Archaeological Resource Alert sheet to the project prime contractor; to any project subcontractor (including demolition, excavation, grading, foundation, pile driving, etc. firms); or utilities firm involved in soils disturbing activities within the project sites. Prior to any soils disturbing activities being undertaken each contractor is responsible for ensuring that the Alert sheet is circulated to all field personnel including, machine operators, field crew, pile drivers, supervisory personnel, etc. The Head Foreman or other responsible party shall provide the Environmental Review Officer (ERO) with a signed affidavit to the ERO confirming that all field personnel have received copies of the Alert Sheet.

Should any indication of an archaeological resource be encountered during any soils disturbing activity of the project, the project Head Foreman and/or project sponsor shall immediately notify the ERO and shall immediately suspend any soils disturbing activities in the vicinity of the discovery until the ERO has determined what additional measures, if any, should be undertaken.

If the ERO determines that an archaeological resource may be present within one of the project sites, the project sponsor shall retain the services of a qualified archaeological consultant. The archaeological consultant shall advise the ERO as to whether the discovery is an archaeological resource, retains sufficient integrity, and is of potential scientific/historical/cultural significance. If an archaeological resource is present, the archaeological consultant shall identify and evaluate the archaeological resource. The archaeological consultant shall make a recommendation as to what action, if any, is warranted. Based on this information, the ERO may require, if warranted, specific additional measures to be implemented by the project sponsor.

Measures might include: preservation in situ of the archaeological resource; an archaeological monitoring program; or an archaeological testing program. If an archaeological monitoring program or archaeological testing program is required, it shall be consistent with the Major Environmental Analysis (MEA) division guidelines for such programs. The ERO may also require that the project sponsor immediately implement a site security program if the archaeological resource is at risk from vandalism, looting, or other damaging activities.

The project archaeological consultant shall prepare a Final Archaeological Resources Report (FARR) evaluating the historical importance of the archaeological resource and describing the archaeological and historical research methods employed in the archaeological monitoring/data recovery program(s). Information that may put at risk any archaeological resource shall be provided in a separate removable insert within the final report.
Copies of the Draft FARR shall be sent to the ERO for review and approval. Once approved by the ERO, copies of the FARR shall be distributed as follows: California Archaeological Site Survey Northwest Information Center (1 copy) and the San Francisco Redevelopment Agency (1 copy). The Major Environmental Analysis division of the Planning Department shall receive three copies of the FARR along with copies of any formal site recordation forms (CA DPR 523 series) and/or documentation for nomination to the National Register of Historic Places/California Register of Historical Resources. In instances of high public interest or interpretive value, the ERO may require a different final report content, format, and distribution than that presented above.

**With regard to the Muni Substation Site: On-site monitoring.** Based on the reasonable potential that archaeological resources may be present within these project sites, the following measures shall be undertaken to avoid any potentially significant adverse effect from the proposed project on buried or submerged historical resources. The project sponsor shall retain the services of a qualified archaeological consultant having expertise in California prehistoric and urban historical archaeology. The archaeological consultant shall undertake an archaeological monitoring program. All plans and reports prepared by the consultant as specified herein shall be submitted first and directly to the ERO for review and comment, and shall be considered draft reports subject to revision until final approval by the ERO. Archaeological monitoring and/or data recovery programs required by this measure could suspend construction of the project for up to a maximum of four weeks. At the direction of the ERO, the suspension of construction can be extended beyond four weeks only if such a suspension is the only feasible means to reduce to a less than significant level potential effects on a significant archaeological resource as defined in CEQA Guidelines Sect. 15064.5 (a) and (c).

*Archaeological monitoring program (AMP).* The archaeological monitoring program shall minimally include the following provisions:

- The archaeological consultant, project sponsor, and ERO shall meet and consult on the scope of the AMP reasonably prior to any project-related soils disturbing activities commencing. The ERO in consultation with the project archaeologist shall determine what project activities shall be archaeologically monitored. In most cases, any soils disturbing activities, such as demolition, foundation removal, excavation, grading, utilities installation, foundation work, driving of piles (foundation, shoring, etc.), site remediation, etc., shall require archaeological monitoring because of the potential risk these activities pose to archaeological resources and to their depositional context;

- The archaeological consultant shall advise all project contractors to be on the alert for evidence of the presence of the expected resource(s), of how to identify the evidence of the expected resource(s), and of the appropriate protocol in the event of apparent discovery of an archaeological resource;

- The archaeological monitor(s) shall be present on the applicable project site according to a schedule agreed upon by the archaeological consultant and the ERO until the ERO has, in consultation with the archaeological consultant, determined that project construction activities could have no effects on significant archaeological deposits;

- The archaeological monitor shall record and be authorized to collect soil samples and artifactual/ecofactual material as warranted for analysis;

- If an intact archaeological deposit is encountered, all soils disturbing activities in the vicinity of the deposit shall cease. The archaeological monitor shall be empowered to temporarily redirect demolition/excavation/pile driving/construction crews and heavy equipment until the deposit is evaluated. If in the case of pile driving activity (foundation, shoring, etc.), the archaeological monitor has cause to believe that the pile driving activity
may affect an archaeological resource, the pile driving activity shall be terminated until an appropriate evaluation of the resource has been made in consultation with the ERO. The archaeological consultant shall immediately notify the ERO of the encountered archaeological deposit. The archaeological consultant shall, after making a reasonable effort to assess the identity, integrity, and significance of the encountered archaeological deposit, present the findings of this assessment to the ERO.

If the ERO in consultation with the archaeological consultant determines that a significant archaeological resource is present and that the resource could be adversely affected by the proposed project, at the discretion of the project sponsor either:

A) The proposed project shall be re-designed so as to avoid any adverse effect on the significant archaeological resource; or

B) An archaeological data recovery program shall be implemented, unless the ERO determines that the archaeological resource is of greater interpretive than research significance and that interpretive use of the resource is feasible.

If an archaeological data recovery program is required by the ERO, the archaeological data recovery program shall be conducted in accord with an *archaeological data recovery plan (ADRP)* and with the requirements of the project archaeological research design and treatment plan prepared by Archeo-Tec (see footnote 11, p. 15). The project archaeological consultant, project sponsor, and ERO shall meet and consult on the scope of the ADRP. The archaeological consultant shall prepare a draft ADRP that shall be submitted to the ERO for review and approval. The ADRP shall identify how the proposed data recovery program will preserve the significant information the archaeological resource is expected to contain. That is, the ADRP will identify what scientific/historical research questions are applicable to the expected resource, what data classes the resource is expected to possess, and how the expected data classes would address the applicable research questions. Data recovery, in general, should be limited to the portions of the historical property that could be adversely affected by the proposed project. Destructive data recovery methods shall not be applied to portions of the archaeological resources if nondestructive methods are practical.

*Human Remains, Associated or Unassociated Funerary Objects.* The treatment of human remains and of associated or unassociated funerary objects discovered during any soils disturbing activity shall comply with applicable State and Federal Laws, including immediate notification of the Coroner of the City and County of San Francisco and in the event of the Coroner’s determination that the human remains are Native American remains, notification of the California State Native American Heritage Commission (NAHC) who shall appoint a Most Likely Descendant (MLD) (Pub. Res. Code Sec. 5097.98). The archaeological consultant, project sponsor, and MLD shall make all reasonable efforts to develop an agreement for the treatment of, with appropriate dignity, human remains and associated or unassociated funerary objects (CEQA Guidelines. Sec. 15064.5(d)). The agreement should take into consideration the appropriate excavation, removal, recordation, analysis, curation, possession, and final disposition of the human remains and associated or unassociated funerary objects.

*Final Archaeological Resources Report.* The archaeological consultant shall submit a Draft Final Archaeological Resources Report (FARR) to the ERO that evaluates the historical significance of any discovered archaeological resource and describes the archaeological and historical research methods employed in the archaeological testing/monitoring/data recovery program(s) undertaken. Information that may put at risk any archaeological resource shall be provided in a separate removable insert within the draft final report.
Copies of the Draft FARR shall be sent to the ERO for review and approval. Once approved by the ERO copies of the FARR shall be distributed as follows: California Archaeological Site Survey Northwest Information Center (NWIC) shall receive one (1) copy and the ERO shall receive a copy of the transmittal of the FARR to the NWIC. The San Francisco Redevelopment Agency shall receive one copy of the FARR. The Major Environmental Analysis division of the Planning Department shall receive three copies of the FARR along with copies of any formal site recordation forms (CA DPR 523 series) and/or documentation for nomination to the National Register of Historic Places/California Register of Historical Resources. In instances of high public interest or interpretive value of the resource, the ERO may require a different final report content, format, and distribution than that presented above.

**With regard to Parcel C and the Rosa Parks site: Pre-Construction Testing.** Based on a reasonable presumption that archaeological resources may be present within the Rosa Parks project site, the following measures shall be undertaken to avoid any potentially significant adverse effect from the Modified Project on buried or submerged historical resources. The project sponsor shall retain the services of a qualified archaeological consultant having expertise in California prehistoric and urban historical archaeology. The archaeological consultant shall undertake an archaeological testing program as specified herein. In addition, the consultant shall be available to conduct an archaeological monitoring and/or data recovery program if required pursuant to this measure. The archaeological consultant’s work shall be conducted in accordance with this measure at the direction of the Environmental Review Officer (ERO). All plans and reports prepared by the consultant as specified herein shall be submitted first and directly to the ERO for review and comment, and shall be considered draft reports subject to revision until final approval by the ERO. Archaeological monitoring and/or data recovery programs required by this measure could suspend construction of the project for up to a maximum of four weeks. At the direction of the ERO, the suspension of construction can be extended beyond four weeks only if such a suspension is the only feasible means to reduce to a less than significant level potential effects on a significant archaeological resource as defined in CEQA Guidelines Sect. 15064.5 (a) and (c). In instances of any inconsistency between the requirements of the project archaeological research design and treatment plan and of this archaeological mitigation measure, the requirements of the latter shall prevail.

**Archaeological Testing Program.** The archaeological consultant shall prepare and submit to the ERO for review and approval an archaeological testing plan (ATP). The archaeological testing program shall be conducted in accordance with the approved ATP. The ATP shall identify the property types of the expected archaeological resource(s) that potentially could be adversely affected by the Modified Project, the testing method to be used, and the locations recommended for testing. The purpose of the archaeological testing program will be to determine to the extent possible the presence or absence of archaeological resources and to identify and to evaluate whether any archaeological resource encountered on the site constitutes an historical resource under CEQA.

At the completion of the archaeological testing program, the archaeological consultant shall submit a written report of the findings to the ERO. If based on the archaeological testing program the archaeological consultant finds that significant archaeological resources may be present, the ERO in consultation with the archaeological consultant shall determine if additional measures are warranted. Additional measures that may be undertaken include additional archaeological testing, archaeological monitoring, and/or an archaeological data recovery program. If the ERO determines that a significant archaeological resource is present and that the resource could be adversely affected by the Modified Project, at the discretion of the project sponsor either:

A) The proposed project shall be re-designed so as to avoid any adverse effect on the significant archaeological resource; or
B) A data recovery program shall be implemented, unless the ERO determines that the archaeological resource is of greater interpretive than research significance and that interpretive use of the resource is feasible.

Whether or not significant archaeological resources are encountered, the archaeological consultant shall submit a written report of the findings of the monitoring program to the ERO.

The above sections of Mitigation Measure 6 that specifically apply to the Muni substation site and Parcel C would apply to the Modified Project.

**Mitigation Measure 7 – Architectural Resources**

To ensure that reuse of the former Municipal Railway substation (City Landmark No. 105) “shall be considered as mitigated to a level of less than a significant impact on the historic resource,” in accordance with CEQA Guidelines Section 15064.5(b)(3), the Redevelopment Agency shall require that the developer selected to rehabilitate and reuse the substation carry out a project that is determined to be consistent with the Secretary of the Interior’s Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings or, alternatively, the Redevelopment Agency shall require that the developer selected to rehabilitate and reuse the substation carry out a project that is reviewed prior to the issuance of any building or site permits by a qualified preservation architect and/or preservation consultant and determined by that qualified professional, on the basis of substantial evidence, not to “cause a substantial adverse change in the significance of an historical resource” within the meaning of CEQA Section 21084.1 and Section 15064.5(b)(1) of the state CEQA Guidelines.

Mitigation Measure 7 would apply to the Modified Project with respect to the Muni Substation site.

**Conclusion**

Overall, as discussed above, the Modified Project would result in similar impacts to those of the Original Project, because the Modified Project would result in similar operations as that which was originally proposed at the Muni substation and Parcel C project site and would therefore generate comparable impacts with regard to visual quality, hazards, and cultural resources, while the other impacts would be generally the same as those of the Original Project.

In light of the above, the Modified Project would not result in new significant effects or effects that would be substantially more severe than those identified in the MND. The mitigation measures included in the MND that specifically apply to the Modified Project would remain applicable. The Agency will ensure the implementation of the mitigation measures set forth in this analysis.

Based on the above analysis, the analyses conducted and the conclusions reached in the MND issued on May 18, 2004 remain current and valid. The proposed revisions to the project would not cause new significant impacts not identified in the MND, and no new mitigation measures would be necessary to reduce significant impacts. Not changes have occurred with respect to circumstances surrounding the proposed project that would cause significant environmental impacts to which the project would contribute considerably, and no new information has become available that shows that the project would cause significant environmental impacts not already analyzed in the MND. Therefore, no further environmental review is required beyond this addendum.