

San Francisco Redevelopment Agency

72 TOWNSEND STREET RESIDENTIAL PROJECT

DRAFT ENVIRONMENTAL IMPACT REPORT

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**72 Townsend Street
Draft Environmental Impact Report**

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I. SUMMARY

A. INTRODUCTION

This Draft Environmental Impact Report (“EIR”) was prepared in accordance with the California Environmental Quality Act (“CEQA”) for the proposed redevelopment of the existing single-story warehouse building at 64-72 Townsend Street, between Second and Colin P. Kelly Jr. Streets, into a nine-story, 99-foot-high, approximately 147,320-gross-square-foot (“gsf”) building providing 74 dwelling units and 74 above-grade parking spaces. The new project site address will be 72 Townsend Street.

On the basis of the Initial Study, dated January 13, 2006, the San Francisco Redevelopment Agency (“Agency”) determined that an EIR is required. (See Appendix A, Notice of Preparation/Initial Study.) This EIR is intended to provide information on the environmental effects of the proposed 72 Townsend Street project to allow the Agency to make an informed decision on the project.

B. PROJECT DESCRIPTION

The project site is in the northeast quadrant of San Francisco, in an area known as South Beach. The rectangular project site is on the west side of the City block bounded by Townsend, Colin P. Kelly Jr., Brannan, and Second Streets. The project site is located at 64-72 Townsend Street, on Assessor's Block 3789, Lot 3. The 29,098-square-foot site (approximately 0.67 acre) currently contains the 31-foot-tall, single-story Hooper’s South End Grain Warehouse building (“Hooper’s Warehouse”) that was constructed in 1874 and survived the 1906 earthquake and fire that destroyed most of the area immediately north of the site. The existing building contains approximately 28,175 gross square feet and is currently vacant.

The Hooper’s Warehouse building is listed in local and state surveys of buildings that could be considered historic resources: the State Office of Historic Preservation (“OHP”) Status Code 2S2 indicates that the building has been found eligible for listing in the National Register of Historic

Places (“National Register”) and has already been listed in the California Register of Historic Resources (“California Register”); the building is listed in *Splendid Extended* (the Foundation for San Francisco's Architectural Heritage's extended survey of Downtown San Francisco); and the building is recognized as a Contributory Building to the South End Historic District.

The project sponsor, Lambert Development LLC, proposes to retain the existing historic warehouse building occupying the entire site, except for the roof, and to construct seven residential stories on top of the existing building, creating a nine-story building. The first two levels (in the shell of the existing building) would contain two levels of above-grade parking with 74 spaces, as well as 5,000 square feet of ground-floor neighborhood-serving retail space. The upper seven floors would contain 37 one-bedroom units and 37 two-bedroom units for a total of 74 units. Vehicular access to the parking garage would be on Colin P. Kelly Jr. Street on the east side of the building via an existing opening in the historic building. Pedestrian access would be from a lobby facing Colin P. Kelly Jr. Street.

Following completion and certification of the Final EIR, the proposed project would require review by the Agency for consistency with the *Rincon Point-South Beach Redevelopment Plan* (“*Redevelopment Plan*”), the *Rincon Point-South Beach Design for Development* (“*Design for Development*”), the *San Francisco General Plan* (“*General Plan*”), the *Northeastern Waterfront Plan* (an area plan element of the *General Plan*) and other relevant plans. The proposed project would also need the following approvals, with acting bodies shown in italics:

- Building and Demolition Permit. *Department of Building Inspection and Agency approval*
- Owner Participation Agreement (“OPA”) with the Agency. *Agency Commission approval*

C. MAIN ENVIRONMENTAL EFFECTS

This EIR for the proposed project focuses on the issues of historical resources and transportation. All other potential environmental effects (related to visual quality and urban design, light and glare, agricultural resources, air quality/climate, wind, shadow, biology, archeological resources, geology/topography, hazards, hydrology and water quality, land use, noise, population and housing, utilities/public services, and recreation) were found to be at less than significant levels or to be mitigated to less than significant levels with mitigation measures to be implemented by the project sponsor. (Please see Appendix A, Notice of Preparation/Initial Study, for analysis of other

environmental issues.) A section on growth inducement is included in this EIR, and land use is discussed for informational purposes.

Historical Resources (page 32)

The Hooper's South End Grain Warehouse building at 64-72 Townsend Street is located within the South End Historic District, and is listed in the following local and state surveys of buildings that could be considered historic resources: OHP Status Code 2S2 indicates that the building has been found eligible for listing in the National Register and has already been listed in the California Register; the building is listed in *Splendid Extended*; and the building is recognized as a Contributory Building to the South End Historic District. *Splendid Extended* assigns Hooper's Warehouse a "B" rating, denoting it as of "Major Importance."

In their evaluation of the Hooper's Warehouse building at 64-72 Townsend Street under the criteria of the California Register, Page & Turnbull concluded that the building would qualify for listing in the California Register under Criterion 2 (Person) and Criterion 3 (Architecture), and while the building has lost its integrity of materials, it retains its integrity of location, design, setting, workmanship, feeling and association, and therefore retains its overall integrity. For these reasons, Hooper's Warehouse qualifies as an historical resource under CEQA.

The *Secretary of the Interior's Standards for Rehabilitation & Illustrated Guidelines for Rehabilitating Historic Buildings* ("*Secretary of the Interior's Standards*") provide guidance for reviewing proposed work to historic properties. Although the 1999 modifications to the building degraded the historic character of the building in terms of surface finish and fenestration, they did not alter the overall form of the building. This form would, however, be substantially altered by the proposed project's addition of the residential structure, which would not be consistent with the *Secretary of the Interior's Standards*. While implementation of Mitigation Measures CR-1 through CR-4 (pages 84 and 85) would reduce this impact, the effect of the proposed project on historic resources could not be reduced to a less than significant level, and the proposed project would have a significant, unavoidable adverse impact. Further, the proposed project would add to the alteration of the former industrial character of the local area, which would result in a considerable contribution to a significant adverse cumulative impact on historic architectural resources in the project vicinity.

Land Use, Zoning, and Plan Consistency (page 50)

The project site is within the South Beach Subarea of the Rincon Point-South Beach Redevelopment Project Area. The project site is also within the plan area of the *Northeastern Waterfront Plan*. The project site is designated for Commercial with Alternate Residential use in the *Rincon Point-South Beach Redevelopment Plan*, and the *Redevelopment Plan* establishes a height limitation of 40 to 105 feet for the project site, which is consistent with the City's 105-F Height and Bulk District. Sites designated Commercial with Alternate Residential may be developed with housing, as well as commercial uses including, but not limited to, retail sales, professional offices, and eating and drinking establishments. Implementation of the *Redevelopment Plan* commenced in 1981 with the overall goal of converting the blighted Rincon Point and South Beach areas—two non-contiguous areas along the eastern waterfront—into new mixed-use waterfront neighborhoods.

The proposed project would change land use at the development site from a vacant building to a more intense multi-story residential building with ground-floor retail and parking garage. The proposed project would consist of an approximately 147,320-gsf building with 74 dwelling units, 5,000 square feet of retail space, and 74 parking spaces, on a site that is currently occupied by a vacant 31-foot-tall, single-story non-residential building of about 28,175 gross square feet.

The proposed change in land use would constitute a substantial physical change at the northwest corner of Townsend and Colin P. Kelly Jr. Streets. In the past, the project vicinity has been characterized by predominately low- to mid-rise industrial buildings and surface parking lots. The area has undergone a substantial transformation over the past twenty years as numerous comparatively high-intensity residential developments have been built. The completion of the 41,000-seat AT&T Park (the San Francisco Giants' ballpark) in 2000 also has contributed significantly to the evolution of the area's character.

The proposed residential use would be similar to, and consistent with, the existing high-rise residential development located adjacent to and near the site. The proposed 99-foot high, 74-unit project would be smaller than the existing buildings across the street from the project block (the South Beach Marina Apartments are about 130 feet high with 414 units, The Towers at Embarcadero South are about 140 feet with 233 units, and The Brannan towers are about 170 feet high with 336 units). The proposed project would further intensify the residential uses in the South Beach area, but

would be compatible with the existing character of the immediate vicinity, and would not physically divide or disrupt this neighborhood. Those surrounding uses and activities would continue on their own sites and would interrelate with each other as they do at present, and would not be substantially affected by the proposed new building uses at the site. Therefore, the proposed project's impacts on existing land uses would be considered less than significant.

Transportation (page 62)

Based on the San Francisco Planning Department ("Planning Department") standard trip rate for residential space, the proposed project would generate about 1,390 new daily person trips on a weekday, of which approximately 178 would occur during the p.m. peak hour. These 178 new person trips would include 66 trips by automobile, 34 trips by transit, and 78 trips by walking or other modes. Given applicable vehicle occupancy rates, the 66 trips by automobile would translate to 50 new vehicle trips during the p.m. peak hour.

The traffic analysis completed by LCW Consulting for the proposed project¹ examined existing and future operating conditions at four intersections in the vicinity of the project: Townsend Street/The Embarcadero, Townsend/Colin P. Kelly Jr. Streets, Townsend/Second Streets, and King/Second Streets. Weekday traffic counts were made at these intersections in order to evaluate the existing traffic conditions during the weekday p.m. peak hour. The Agency and the Planning Department considers intersection levels of service ("LOS") ranging from LOS A to LOS D to be acceptable at signalized intersections, while LOS E and F are unacceptable. Any degradation to LOS E or F (including from LOS E to LOS F) is considered a significant impact on traffic circulation and operations. During the weekday p.m. peak hour, all of the four study intersections currently operate with acceptable conditions (LOS D or better).

The addition of project-generated traffic to existing traffic would result in a relatively small change in the average delay per vehicle at the study intersections, and all four study intersections would continue to operate at the same acceptable service levels as under existing conditions.

Traffic volumes and congestion are anticipated to increase over time in the project vicinity and intersection levels of service are expected to deteriorate. In 2025, poor operating conditions would

¹ 72 Townsend Street Transportation Study – Revised Final Report, LCW Consulting, April 3, 2006.

occur along the access routes to the Interstate 280 (“I-280”) King Street on-ramps. Under cumulative conditions, the contribution of the proposed project to the two study intersections that would operate at LOS E during the weekday p.m. peak hour (Townsend/The Embarcadero and King/Second) would be between 1.0 and 3.1 percent of the traffic growth. At the intersection of Townsend/The Embarcadero, the proposed project would add traffic to movements that would continue to operate satisfactorily. However, at the intersection of King/Second, the proposed project would add to some critical intersection movements that would operate poorly under 2025 Cumulative conditions. In particular, the proposed project would add four vehicle-trips to the eastbound left turn movement and three vehicle-trips to the southbound right turn movement. The contributions to these movements would be very small, and therefore, the proposed project would not be considered to contribute significantly to 2025 Cumulative impacts.

The project site is in an area served by public transit. The proposed project would generate about 14 new outbound transit trips and 20 inbound trips (total 34 trips) during the weekday p.m. peak hour. In the immediate vicinity of the project site, the transit lines generally have available capacity during the weekday p.m. peak hour that could be used to accommodate the transit trips generated by the proposed project. Therefore, the proposed project would not substantially affect, or have a significant impact on, transit operations.

The proposed project would generate an additional 112 pedestrian trips to and from the site during the weekday p.m. peak hour, including the pedestrian trips associated with the 34 project-generated transit trips. With the proposed project, pedestrian conditions on area sidewalks would continue to remain acceptable, and the proposed project would not result in significant environmental impacts.

In general, during both the weekday midday and evening periods, bicycle conditions in the vicinity of the project site were observed to be operating acceptably, with only minor conflicts between bicyclists, pedestrians, and vehicles. Although the proposed project would increase the number of vehicles, this increase would not be substantial enough to affect bicycle travel in the area, and would not result in significant environmental impacts.

The proposed project would generate a long-term residential parking demand for about 91 spaces. The long-term residential demand generally occurs during the evening and overnight hours. The long-term parking demand of 91 spaces would not be accommodated within the parking supply of 74

parking spaces, which would result in a shortfall of 17 spaces. This shortfall would be accommodated by on-street or in nearby off-street parking facilities that provide overnight parking.

During the weekday midday, the residential parking demand is estimated to be about 80 percent of the overnight parking demand, or about 73 spaces. In addition, there would be a parking demand for the retail uses of 14 spaces. It is anticipated that a portion of the 17-space overnight parking shortfall would remain parked on-street or in off-street facilities during the day. Since the proposed project would provide 74 parking spaces, which is the maximum allowed under the *Design for Development*, there would be a shortfall of between 13 parking spaces and 31 parking spaces during the midday period, and on-street and off-street parking occupancy in the study area would increase. The short-term parking demand could be accommodated within the on-street supply, which is generally restricted to one-hour and two-hour parking limits. Therefore, the proposed project would not result in significant parking impacts resulting from the parking shortfall.

The proposed project would provide one off-street loading space, which would meet the estimated loading demand. The *Design for Development* would not require the proposed project to provide loading spaces for either the residential or retail uses.

During project construction, anticipated to last approximately 14 months, construction staging would occur primarily within the site, and possibly from the adjacent sidewalk on Colin P. Kelly Jr. Street. It is anticipated that the sidewalk along the project site frontage on Colin P. Kelly Jr. and Townsend Streets would be closed throughout the construction duration, and that a temporary pedestrian walkway and overhead protection would be constructed. It is anticipated that no regular traffic lanes would need to be closed during construction. Since there are no San Francisco Municipal Railway (“Muni”) bus stops along the project site frontage, it is not anticipated that any Muni bus stops would need to be relocated during construction of the proposed project. On average, there would be between 15 and 85 construction workers per day at the project site, depending on the phase. The construction workers would cause a temporary increase in parking demand, which is anticipated to be accommodated within the 270 Brannan Street parking lot (located on the north side of Brannan, midblock between Second Street and Delancey Street and opposite from the northern terminus of Colin P. Kelly Jr. Street).

Growth Inducement (page 81)

The proposed project entails redevelopment of the existing single-story warehouse building on the site into a nine-story building providing 74 dwelling units, 74 parking spaces, and 5,000 square feet of neighborhood-serving retail space. The additional residential and retail space in the South Beach neighborhood would add a daily population of approximately 123 people to the currently vacant project site, including 109 new residents and 14 new employees. The increase of approximately 14 onsite jobs to the vicinity would not be considered significant in the large and dynamic economy of the Bay Area. The demand for housing by project workers would be substantially less than the number of residential units created by the proposed project; thus, the project would not create a demand for housing. Because of the current strong demand for housing that would exist with or without the proposed project, especially for housing close to the Financial District, the proposed project would not induce substantial growth or concentration of population beyond that which would have occurred without the project. Some project residents may relocate from other parts of the Bay Area to be closer to their employment in Downtown San Francisco. To the extent that this occurs, the proposed project would result in reduced commuting distances to work. For these reasons, the proposed project would not cause significant growth-inducing impacts.

D. MITIGATION MEASURES (page 83)

AQ-1. Construction Air Quality

The project applicant shall require the construction contractor to reduce the severity of project construction period dust impacts by complying with the following control measures:

- Water all active construction areas at least twice daily. Consistent with Ordinance 175-91, only non-potable water shall be used for all dust-control purposes. The construction contractor shall obtain reclaimed water from the City's Clean Water Program for this purpose.
- Cover all trucks hauling soil, sand, and other loose materials, or require all trucks to maintain at least 2 feet of freeboard.
- Pave, apply water two times daily, or apply non-toxic soil stabilizers on all unpaved access roads, parking areas, and staging areas at the construction site.
- Sweep daily (with water sweepers) all paved access roads, parking areas, and staging areas at the construction site.
- Sweep adjacent public streets daily (with water sweepers) if any visible soil material is carried onto the streets.
- All construction contracts shall require construction contractors to (1) properly maintain construction equipment and vehicles in accordance with the manufacturers'

recommendations, and (2) minimize idling time when equipment is not in use and when trucks are waiting in queues.

CR-1. Historic Resources (Stucco Finish)

Remove the non-historic stucco finish. Prior to 1999, Hooper's Warehouse was stuccoed, and experts disagreed about whether or not it was originally exposed brick or stucco. Further testing should be conducted, but the existing stucco is clearly non-historic and damaging to the building's character. If it is possible to remove it without damaging the brick below, removing it to expose the brick, or removing it and applying a stucco finish that more closely approximates an historic finish would offer one means of mitigating the effect posed by the residential addition.

CR-2. Historic Resources (Fenestration on Townsend Street Façade)

Decrease the level of fenestration on the Townsend Street façade. Through incremental change and the 1999 project, the Townsend Street façade has been drastically opened, losing the sense of enclosure that is characteristic of this warehouse type. By decreasing the size of openings and rebuilding some of the former wall, the proposed project could partially mitigate the impact of the construction of the new residential structure.

CR-3. Historic Resources (Chamfered Corner)

Remove the non-historic chamfered corner and replace it with a storefront aligned with the streets.

CR-4. Historic Resources (Documentation)

Document the history and the existing exterior and interior conditions of Hooper's South End Grain Warehouse according to the *Historic American Buildings Survey* ("HABS") Level II documentation in addition to the other mitigation measures identified, and (2) install on-site displays communicating the historic significance of the building and the historical location of the shoreline.

(1) According to HABS standards, Level II documentation consists of the following tasks:

- *Drawings:* Existing drawings, where available, should be photographed with large format negatives or photographically reproduced on mylar.
- *Photographs:* Photographs with large-format negatives should be shot of exterior and interior views or historic views where available. These should be printed on archival fiber paper.
- *Written data:* A report documenting the existing conditions and history of the building should be prepared.

The completed documentation package would be submitted to local and regional archives, including but not limited to, the San Francisco Public Library History Room, the California

Historical Society and the Northwest Information Center at Sonoma State University in Rohnert Park.

- (2) Install a plaque at the front of the building to communicate its historic significance. In addition, the sidewalk around Hooper's South End Grain Warehouse makes indications about the historic location of the shoreline, which once passed underneath the corner of the building. The existing pavement does not continue those lines to the edge of the building. When relaying concrete around the building, continue the historic lines up to the edge of the building.

CR-5. Historic Resources (Subsurface Cultural Resources)

The following mitigation measure is required to avoid any potential adverse effect from the proposed project on accidentally discovered buried or submerged historical resources as defined in *CEQA Guidelines* Section 15064.5(a)(c), including human or associated funerary remains. The project sponsor shall retain the services of an archaeologist. During any soils disturbing activities within the project site, the archaeologist shall carry out a pre-excavation testing program to better determine the probability of finding archaeological remains on the site. The testing program shall consist of a series of mechanical exploratory borings or trenches and/or other testing methods determined to be appropriate by the archaeologist.

If, after testing, the archaeologist determines that no further investigations or precautions are necessary to safeguard potentially significant archaeological resources, the archaeologist shall submit a written report to the City's Environmental Review Officer ("ERO"), with copies to the project sponsor and the Agency. If the archaeologist determines that further investigations or precautions are necessary, he/she shall consult with the ERO, and they shall jointly determine what additional procedures are necessary to minimize potential effects on archaeological resources.

These additional mitigation measures shall be implemented by the project sponsor and might include a program on on-site monitoring of any site excavation and foundation work that may be necessary, during which the archaeologist shall record observations in a permanent log. Whether or not there are archaeological finds of significance, the archaeologist shall prepare a written report on the monitoring program that shall be submitted first and directly to the ERO with copies to the project sponsor and Agency. During the monitoring program, the project sponsor shall designate one individual on site as his/her representative. This representative shall have the authority to suspend work at the site to give the archaeologist time to investigate and evaluate archaeological resources that may be encountered.

Should evidence of cultural resources of potential significance be found during the monitoring program, the archaeologist shall immediately notify the ERO, and the project sponsor shall halt any activities which the archaeologist and the ERO jointly determine could damage such cultural resources. Ground disturbing activities which might damage cultural resources would be suspended for a total maximum of four weeks over the course of construction.

After notifying the ERO, the archaeologist shall prepare a written report to be submitted first and directly to the EIR, with copies to the project sponsor and Agency, which shall contain an assessment of the potential significance of the archaeological finds and recommendations for

what measures should be implemented to minimize potential effects on archaeological resources. Based on this report, the ERO shall recommend specific additional mitigation measures to be implemented by the project sponsor. These additional mitigation measures might include a site security program, additional on-site investigations by the archaeologist, and/or documentation, preservation and recovery of archival material.

Finally, the archaeologist shall prepare a report documenting the archaeological resources that were discovered, and evaluation as to their significance, and a description as to how any archaeological testing, exploration and/or recovery program was conducted.

Copies of all draft reports prepared according to this mitigation measure shall be sent first and directly to the ERO for review. Following approval by the ERO, copies of the final report shall be sent to the President of the Landmarks Preservation Advisory Board and the Northwest Information Center. Three copies of the final report shall be submitted to the Office of Major Environmental Analysis, accompanied by copies of the transmittals documenting distribution to the President of the Landmarks Preservation Advisory Board and the Northwest Information Center.

CR-6. Historic Resources (Paleontological Resources)

If any paleontological resources are encountered during site grading or other construction activities, all ground disturbance shall be halted until the services of a qualified paleontologist can be retained to identify and evaluate the resource(s) and, if necessary, recommend mitigation measures to document and prevent any significant adverse effects on the resource(s).

HM-1. Hazards (Contaminated Soil)

All contaminated soils designated as hazardous waste shall be excavated by a qualified Removal Contractor and disposed of at a regulated Class I hazardous waste landfill in accordance with U.S. Environmental Protection Agency regulations, as stipulated in the Site Mitigation Plan. The Removal Contractor shall obtain, complete, and sign hazardous waste manifests to accompany the soils to the disposal site. Other excavated soils shall be disposed of in an appropriate landfill, as governed by applicable laws and regulations, or other appropriate actions shall be taken in coordination with the San Francisco Department of Public Health (“DPH”).

A Site Health and Safety (“H&S”) Plan would be required by the California Division of Occupational Safety and Health prior to initiating any earth-moving activities at the site. The H&S Plan shall identify protocols for managing soils during construction to minimize worker and public exposure to contaminated soils. The protocols shall include at a minimum:

- Sweeping of adjacent public streets daily (with water sweepers) if any visible soil material is carried onto the streets.

- Characterization of excavated native soils proposed for use on site prior to placement to confirm that the soil meets appropriate standards.
- The dust controls specified in Air Quality Mitigation Measure AQ-1.
- Protocols for managing stockpiled and excavated soils.

The H&S Plan shall identify site access controls to be implemented from the time of surface disruption through the completion of earthwork construction. The protocols shall include as a minimum:

- Appropriate site security to prevent unauthorized pedestrian/vehicular entry, such as fencing or other barrier or sufficient height and structural integrity to prevent entry and based upon the degree of control required.
- Posting of “no trespassing” signs.
- Providing on-site meetings with construction workers to inform them about security measures and reporting/contingency procedures.

If groundwater contamination is identified, the H&S Plan shall identify protocols for managing groundwater during construction to minimize worker and public exposure to contaminated groundwater. The protocols shall include procedures to prevent unacceptable migration of contamination from defined plumes during dewatering.

The H&S Plan shall include a requirement that construction personnel be trained to recognize potential hazards associated with underground features that could contain hazardous substances, previously unidentified contamination, or buried hazardous debris. Excavation personnel shall also be required to wash hands and face before eating, smoking, and drinking.

The H&S Plan shall include procedures for implementing a contingency plan, including appropriate notification and control procedures, in the event unanticipated subsurface hazards are discovered during construction. Control procedures could include, but would not be limited to, investigation and removal of underground storage tanks or other hazards.

HM-2. Hazards (Decontamination of Equipment)

All trucks and excavation and soil handling equipment shall be decontaminated following use and prior to removal from the site. Gross contamination shall be first removed through brushing, wiping, or dry brooming. The vehicle or equipment shall then be washed clean (including tires). Prior to removal from the work site, all vehicles and equipment shall be inspected to ensure that contamination has been removed.

HM-3. Hazards (Procedures for Handling Contaminated Soils)

The following procedures shall be observed when handling, hauling, and disposing of contaminated soils:

- (a) Specific work practices: The construction contractor shall be alert for the presence of hazardous soils during excavation and other construction activities on the site (detected through soil odor, color, and texture and results of on-site soil testing), and shall be prepared to handle, profile (i.e., characterize), and dispose of such soils appropriately (i.e., as dictated by local, State, and federal regulations) when such soils are encountered on the site. If there are excavated materials containing over one percent friable asbestos, they would be treated as hazardous waste, and would be transported and disposed of in accordance with applicable State and federal regulations. These procedures are intended to mitigate any potential health risks related to chrysotile asbestos, which may or may not be located on the site.
- (b) Dust suppression: Soils exposed during excavation for site preparation and project construction activities shall be kept moist throughout the time they are exposed, both during and after work hours.
- (c) Air monitoring: Air monitoring of ambient air and, as necessary, for worker exposure, shall be performed to ensure compliance with all federal, State, and local regulations and exposure requirements.
- (c) Surface water runoff control: Where soils are stockpiled, visqueen shall be used to create an impermeable liner, both beneath and on top of the soils, with a berm to contain any potential surface water runoff from the soil stockpiles during inclement weather.
- (d) Soils replacement: If necessary, clean fill or other suitable material(s) shall be used to bring portions of the project site, where contaminated soils have been excavated and removed, up to construction grade.
- (e) Hauling and disposal: Contaminated soils shall be hauled off the project site by waste hauling trucks appropriately certified with the State of California and adequately covered to prevent dispersion of the soils during transit, and shall be disposed of at a permitted hazardous waste disposal facility registered with the State of California.

HM-4. Hazards (Closure/Certification Report for Contaminated Soils)

After excavation and foundation construction activities are completed, the project sponsor shall prepare and submit a Closure/Certification Report to DPH for review and approval. The Closure/Certification Report shall include the mitigation measures in the Site Mitigation Plan (“SMP”)² for handling and removing contaminated soils from the project site, whether the construction contractor modified any of these mitigation measures, and how and why the construction contractor modified those mitigation measures.

HM-5. Hazards (Procedures for Exterior Excavation Work)

If excavation work at the exterior of the project building is planned, such as for utility trenches, additional sampling of soils at these exterior locations shall be performed, as directed by DPH.

² *Site Mitigation Plan, 72 Townsend Street, San Francisco, CA*, SCA Project No. X4256.AS, SCA Environmental, Inc., August 2000.

E. SIGNIFICANT ENVIRONMENTAL EFFECTS THAT CANNOT BE AVOIDED IF THE PROJECT IS IMPLEMENTED (page 89)

The proposed project, with mitigation, would have the following unavoidable significant impacts on historic architectural resources:

- o The project sponsor intends to redevelop the Hooper's South End Grain Warehouse building at 64-72 Townsend Street by adding a seven-story residential structure on top of the existing warehouse. The Hooper's Warehouse building at 64-72 Townsend Street is considered a historical resource for CEQA purposes, and the proposed redevelopment of this building would be a significant adverse impact.
- o The proposed project would result in a considerable contribution to a significant cumulative impact on historic architectural resources in the project vicinity.

With implementation of the mitigation measures outlined in Chapter IV, Mitigation Measures, of this report, all other potential significant impacts would be reduced to less than significant levels.

F. ALTERNATIVES TO THE PROPOSED PROJECT (page 91)

Alternative A: No Project

This alternative would entail no change to the existing one-story, approximately 28,175 gsf warehouse building on the site, which is currently vacant but contains retail/restaurant space and a parking garage. The proposed project would not be built. This alternative, however, would not preclude future proposals for redevelopment of the project site for uses permitted in the Commercial/Alternate Use: Residential designation in the *Redevelopment Plan*, and the 40- to 105-foot height district in the *Design for Development*.

If the No Project Alternative were implemented, none of the impacts associated with the proposed project would occur. The existing Hooper's Warehouse building (64-72 Townsend Street) on the site—a building located within the South End Historic District, listed in the California Register, identified by the OHP as having been found eligible for listing in the National Register; listed in *Splendid Extended*; and recognized as a Contributory Building to the South End Historic District—with its existing retail/restaurant space and parking garage, would remain unaltered. The air quality

impacts of the proposed project, and project-specific effects on intersection conditions, transit use, parking, loading, and pedestrian and bicycle traffic, would not occur, although these impacts would not be significant under the proposed project. If the existing building is occupied by retail and/or restaurant uses in the future, additional air emissions and person-trips would be generated, but the impacts would be smaller than those of the proposed project. Intersection operations (at Townsend/The Embarcadero and King/Second) and transit operating conditions would degrade to unacceptable levels of service by the 2025 cumulative horizon year with or without this alternative. Under this alternative, if the existing building remains vacant, there would be no incremental contribution from the project site to these degraded conditions. If the existing building is occupied by retail and/or restaurant uses in the future, the incremental contribution from the project site to these degraded conditions would be less than those of the proposed project.

Other less than significant effects of the proposed project described in the Initial Study (Appendix A), including effects of the proposed project on visual quality and urban design, light and glare, agricultural resources, wind effects, shadow effects on nearby streets and buildings, biology, potential discovery of subsurface cultural resources during excavation, geology/topography, hazardous materials, hydrology and water quality, land use, noise, population and housing, recreation, and utilities/public services would not occur with this alternative and no mitigation measures would be required. If the existing building is occupied by retail and/or restaurant uses in the future, additional impacts on hydrology and water quality, noise, population and housing, recreation, and utilities/public services could occur, but these impacts would be similar to or less than those of the proposed project and these impacts would be less than significant.

The No Project Alternative would not meet Lambert Development LLC's project objectives of maximizing residential density on this infill site.

Alternative B: Preservation Alternative

Alternative B, the Preservation Alternative, would retain the existing Hooper's Warehouse building, with its retail/restaurant space and parking garage, on the site. The building's envelope would not be altered, but the changes of the 1999 adaptive reuse project would be partially reversed by removing the non-historic stucco finish, decreasing the level of fenestration on the Townsend Street façade, replacing the non-historic chamfered corner with a storefront aligned with the streets, and

documenting the history of the building, as described in Mitigation Measures CR-1 through CR-4 (pages 84 and 85). The building would be used for retail/commercial purposes.

Unlike the proposed project, Alternative B: Preservation Alternative would preserve the existing Hooper's Warehouse building on the site. This alternative would avoid the removal of the existing roof, including the original heavy timber posts and trusses, and alteration of the overall form of the building that would occur under the proposed project. This was considered a significant impact on historic resources of the proposed project.

Impacts of this alternative on visual quality, urban design, views, and land use would be less than those of the proposed project and would be less than significant.

Alternative B would generate fewer vehicle trips than the proposed project, and have reduced environmental effects on transportation and parking, although these impacts would be less than significant for the proposed project. This alternative would contribute smaller amounts than the proposed project to the cumulative year 2025 growth in traffic at two nearby intersections that would operate at LOS E under cumulative conditions (Townsend/The Embarcadero and King/Second), but neither this alternative nor the proposed project would have a significant cumulative impact, because both would add traffic to movements that would continue to operate satisfactorily, or would make very small contributions to critical intersection movements that would operate poorly under 2025 Cumulative conditions.

This alternative's effects on wind and shadow would be less than those of the proposed project. The wind and shadow impacts, including cumulative impacts, would be less than significant.

Compared to the proposed project, the Preservation Alternative would have smaller effects on air quality, archeological cultural resources, hazards, noise, utilities and public services, biology, geology/topography, water, and energy/natural resources, and these impacts would be less than significant

Alternative B: Preservation Alternative would not meet Lambert Development LLC's project objectives of maximizing residential density on this infill site.

Alternative C: Reduced Alternative

Alternative C, the Reduced Alternative, would alter the existing Hooper's Warehouse building by constructing additional residential levels. Under this alternative, three or four levels, with approximately 37 residential units, would be added. Approximately 37 above-grade parking spaces on the first two levels would be provided. This alternative would include 5,000 square feet of ground-floor neighborhood-serving retail space.

Alternative C: Reduced Alternative would remove the existing roof, including the original heavy timber posts and trusses, and alter the overall form of the existing Hooper's Warehouse building on the site. Similar to the proposed project, the alterations under this alternative would be considered a significant impact on historic resources.

Under this alternative, the overall appearance of the project site would be substantially altered due to the addition of three or four additional floors. The height, massing, and scale of this alternative would be less than the proposed project, and impacts on visual quality, urban design, and views would be less than those of the proposed project and would be less than significant.

This alternative would add to the intensity of land use within the South Beach area, but the approximately 37 residential units would not be considered a significant addition to the projected residential housing stock in the City in the context of year 2025 housing projections. Land use impacts, including cumulative impacts, of this alternative would be less than those of the proposed project and would be less than significant.

Alternative C would have smaller environmental effects on transportation and parking. This alternative would generate about 1,070 new daily person-trips and 123 weekday p.m. peak hour person-trips (compared to 1,390 new daily person-trips and 178 weekday p.m. peak hour person-trips for the proposed project). The impacts of this alternative on operating conditions and levels of congestion at the key intersections studied would be less than significant. This alternative would contribute smaller amounts than the proposed project to the cumulative year 2025 growth in traffic at two nearby intersections that would operate at LOS E under cumulative conditions (Townsend/The Embarcadero and King/Second), but neither this alternative nor the proposed project would have a significant cumulative impact, because both would add traffic to movements that would continue to

operate satisfactorily, or would make very small contributions to critical intersection movements that would operate poorly under 2025 Cumulative conditions.

This alternative's effects on wind and shadow, including cumulative impacts, would be less than those of the proposed project and would be less than significant.

Compared to the proposed project, the Reduced Alternative would have similar or smaller effects on air quality, archeological cultural resources, hazards, noise, utilities and public services, biology, geology/topography, water, and energy/natural resources, and would be less than significant.

Alternative C: Reduced Alternative would not meet Lambert Development LLC's project objectives of maximizing residential density on this infill site.

Environmentally Superior Alternative

Alternative B: Preservation Alternative would be the environmentally superior alternative, because it avoids the significant impacts of the proposed project on historic architectural cultural resources.

G. AREAS OF CONTROVERSY AND ISSUES TO BE RESOLVED (page 82)

This EIR focuses on the issues of historical resources, transportation, and growth inducement, as well as discussing land use for informational purposes. The Initial Study found that physical environmental effects related to visual quality and urban design, light and glare, agricultural resources, air quality/climate, wind, shadow, biology, archeological resources, geology/topography, hazards, hydrology and water quality, land use, noise, population and housing, utilities/public services, and recreation would not be considered significant or would be reduced to less than significant levels by recommended mitigation measures, and required no further discussion.

Residents of the South Beach neighborhood and business owners and employees in the surrounding urbanized area have expressed concerns in the following areas: views, glare and reflection, project design, daylight in courtyards of adjacent buildings, historic resources, construction and operational noise, construction and operational traffic, transportation improvements at local streets and intersections, parking, and access to the parking garage.

Residents of this neighborhood may be concerned about the potential impacts of a change in use on a site that is currently occupied by a vacant commercial building. In addition, business owners and employees in the surrounding urbanized area may have concerns about any new project. The Agency Commission will be asked to certify the Final EIR after publication and distribution of written responses to all comments received on the Draft EIR. After Final EIR certification, and following consideration of community concerns and the information presented in the Initial Study and this EIR, including any non-environmental issues that were raised during the EIR process, the Agency Commission will decide whether or not to approve the proposed project.

II. PROJECT DESCRIPTION

The project sponsor, Lambert Development LLC, proposes to redevelop the existing single-story warehouse building at 64-72 Townsend Street into a nine-story, 99-foot-high, approximately 147,320-gsf building providing 74 dwelling units and 74 above-grade parking spaces on two levels. The new project site address will be 72 Townsend Street.

A. PROJECT SPONSOR'S OBJECTIVES

The project sponsor has the following objectives:

- Redevelop the existing warehouse building on the site into a high-quality, cost-effective residential/retail building in the South Beach area of San Francisco to provide 74 residential units and associated parking, and 5,000 square feet of neighborhood-serving retail space, to meet the demands of the expanding San Francisco economy and growth in the project area.
- Develop a project consistent with the existing urban design character of the area.
- Complete the project on schedule and within budget.
- Develop a project with minimal environmental disruption.

B. PROJECT LOCATION

The project site is in the northeast quadrant of San Francisco, in an area known as South Beach. The rectangular project site is on the west side of the City block bounded by Townsend, Colin P. Kelly Jr., Brannan, and Second Streets (Figure 1, page 22).³ The project site is located at 64-72 Townsend Street, on Assessor's Block 3789, Lot 3, and totals 29,098 square feet or approximately 0.67 acre. The project site is one block north of the AT&T Park baseball stadium and South Beach Harbor. The terrain in the immediate vicinity of the site slopes upward to the northwest.

³ To simplify the discussion of the direction of City streets south of and including Market Street, the convention of calling northwest-to-southeast streets "north-south" and northeast-to-southwest streets "east-west" is used in this document.



Source: During Associates

81805

Proposed Project Location Figure 1

The site is within the South Beach Subarea of the Rincon Point-South Beach Redevelopment Project Area, and is designated Commercial/Alternate Use: Residential in the *Redevelopment Plan*. The project site is in the 40- to 105-foot height district in the *Design for Development* and 105-F Bulk District pursuant to Article 2.5 of the *San Francisco Planning Code* (“*Planning Code*”). The project site also is within the *Northeastern Waterfront Plan* area and the South End Historic District. The proposed project would require an OPA with the Agency.

The project site is fully covered by the 31-foot-tall, single-story Hooper’s Warehouse building (64-72 Townsend Street) which was constructed in 1874 and survived the 1906 earthquake and fire that destroyed most of the area immediately north of the site. The existing building contains approximately 28,175 gross square feet.

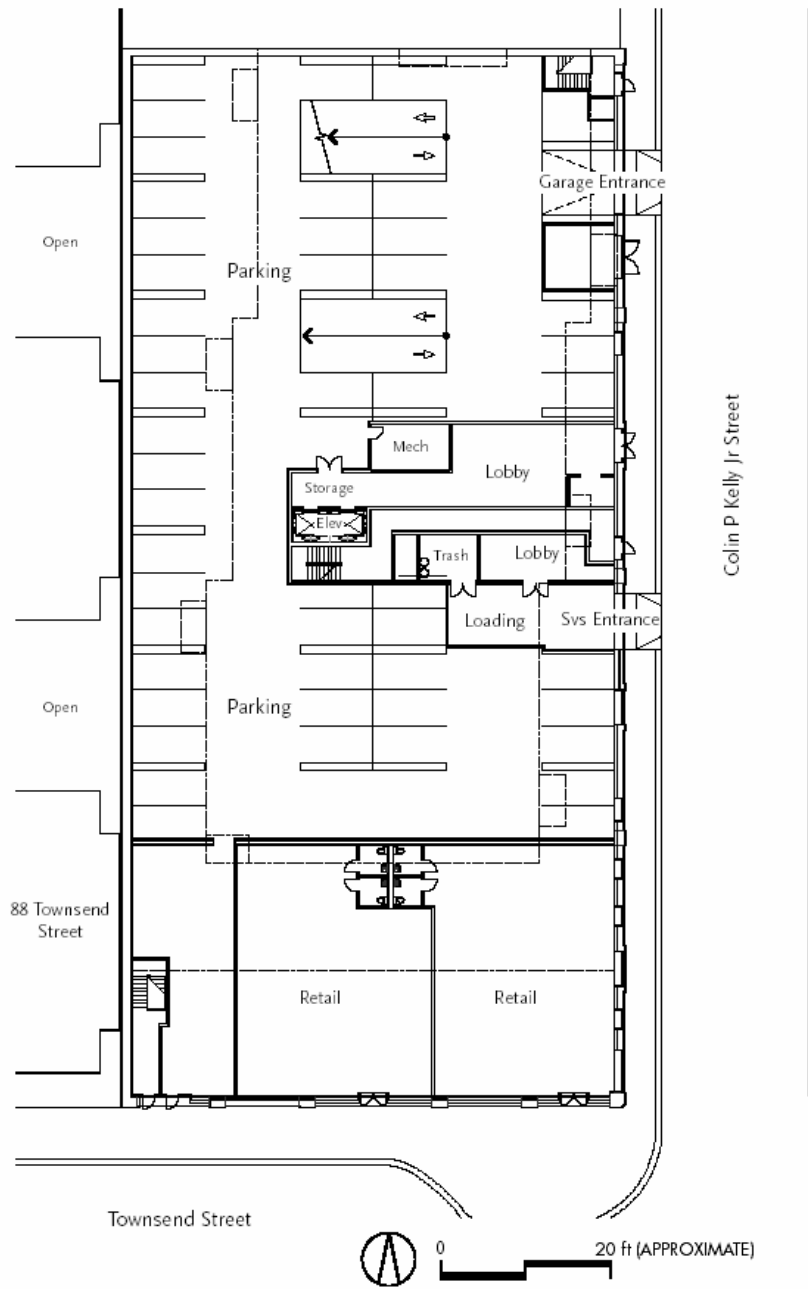
The Hooper’s Warehouse building is listed in both local and state surveys of buildings that could be considered historic resources. OHP Status Code 2S2 indicates that the building has been found eligible for listing in the National Register and has already been listed in the California Register. On the local level, the building is listed in *Splendid Extended*, and is recognized as a Contributory Building to the South End Historic District.

C. PROJECT CHARACTERISTICS

The proposed project consists of redevelopment of an existing single-story warehouse building into a nine-story (99 feet high) building providing 74 dwelling units and 74 above-grade parking spaces (see Figures 2, 3, 4, 5, and 6, pages 24 to 28).

The existing historic warehouse building occupying the entire site would be retained, except for the roof, and would contain two levels of above-grade parking, as well as 5,000 square feet of ground-floor neighborhood-serving retail space divided into two units of 2,500 square feet each. The seven residential stories would be constructed on top of the existing building and would be stepped back from the façade of the existing building to create a podium level with an indoor swimming pool, hot tub, and open space.

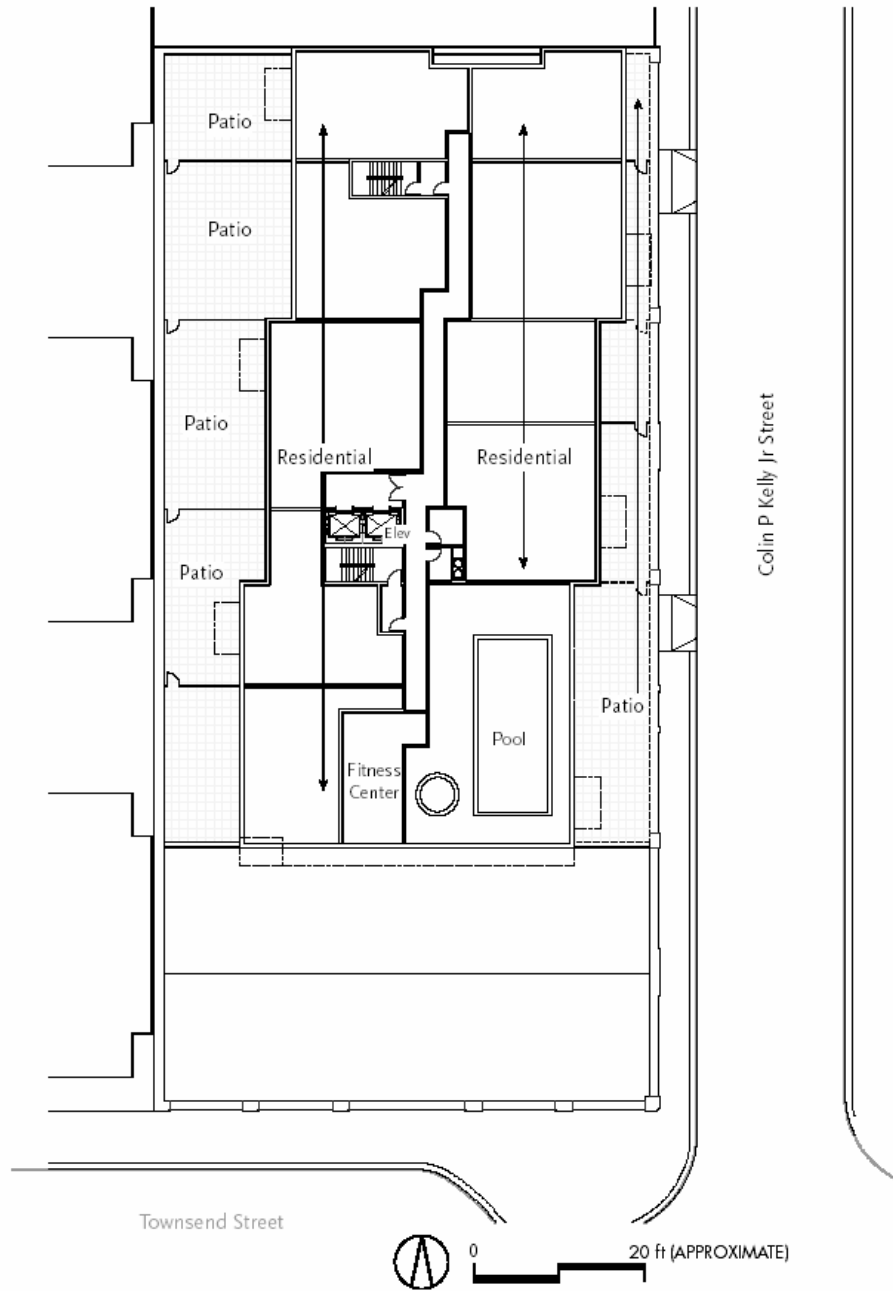
The approximately 147,320 gsf building would contain about 37 one-bedroom units and 37 two-bedroom units. The two-bedroom-plus units would have additional space that could be configured



Source: Lambert Development

12-13-05

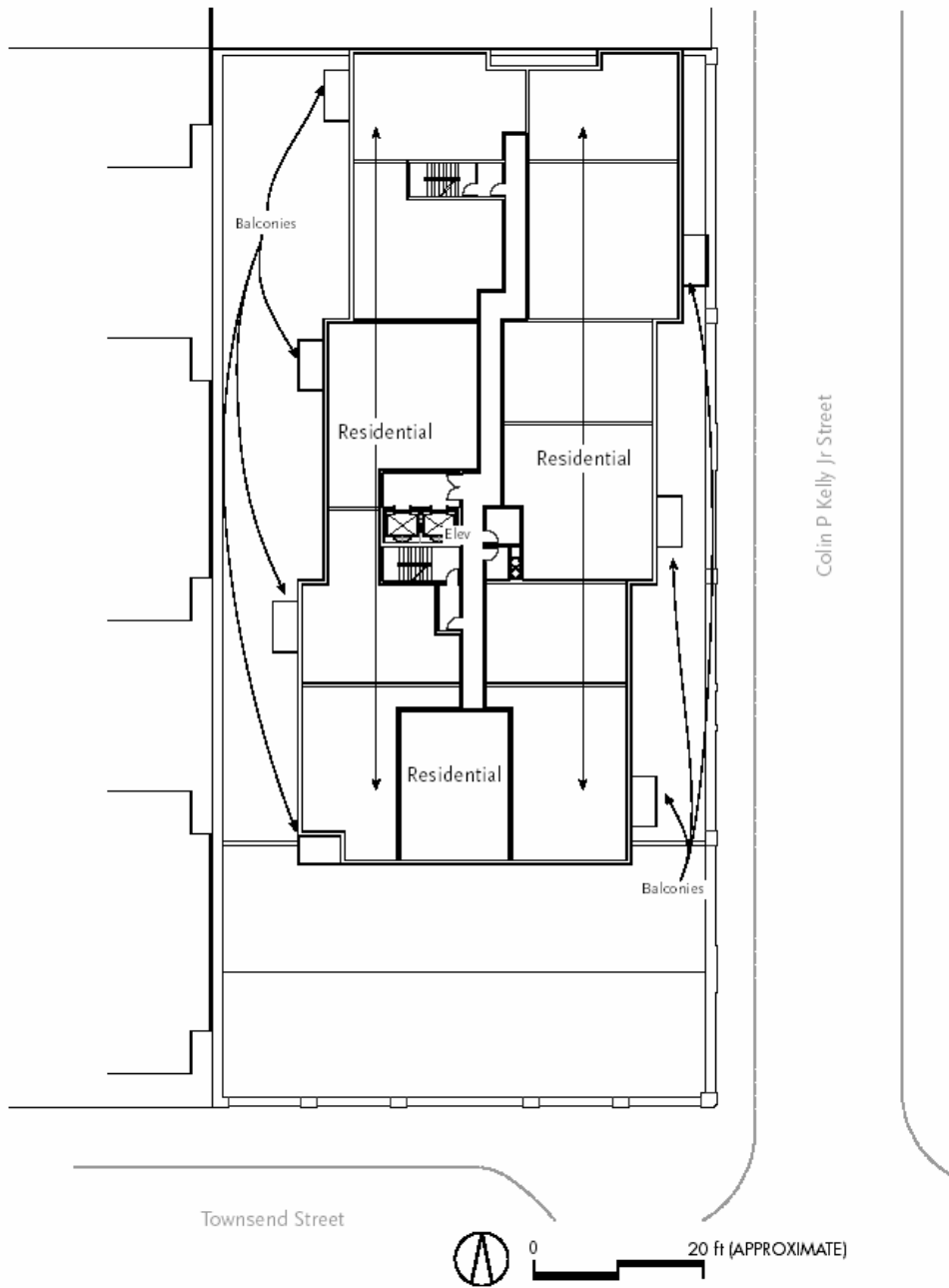
Proposed Ground Floor Plan Figure 2



Source: Lambert Development

12-13-05

Proposed Podium Level Floor Plan Figure 3



Source: Lambert Development

12-13-05

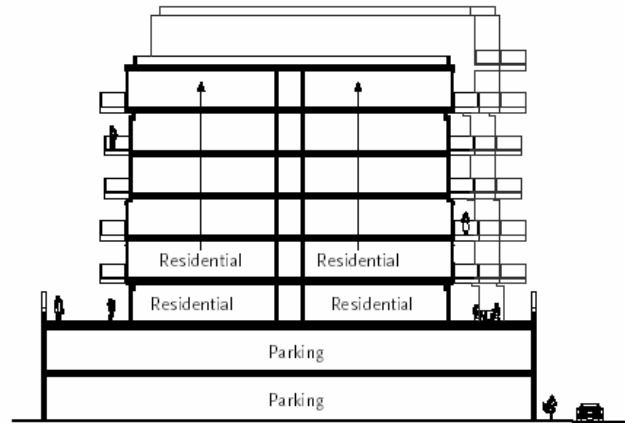
Proposed Residential Floor Plan Figure 4



Source: Lambert Development

12-13-05

Proposed Project Elevation Figure 5



0 20 ft (APPROXIMATE)

Source: Lambert Development

12.13.05

Proposed Project Sections Looking North Figure 6

for a computer alcove, breakfast nook, or additional walk-in closet. The residential units would range in size from 1,089 to 1,241 square feet, with an average size of 1,105 square feet. Ten percent of the units would be sold as below-market rate units to meet the City's affordable housing requirements. Thirty-seven of the units would include 72-square-foot balconies, and four units would have 67-square-foot balconies.

The existing building, which would provide the base for the proposed structure, is built to the property lines. The residential portion of the building would begin on the third (podium) level, rising to approximately 99 in height and would be set back at varying distances from the property lines. The east and west sides of the upper residential stories would be articulated in a "zigzag" alignment to form three vertical planes on these sides of the building. This three-bay massing would echo and be aligned with three of the four pediments capping the eastern façade of the existing building. The façade would be further articulated by the protrusion of balconies from the second through seventh residential floors (i.e., fourth through ninth stories). Exterior materials for the new stories would be glass, aluminum, and possibly some terra cotta infill.

The ground floor would contain 29,000 gross square feet, including a lobby facing Colin P. Kelly Jr. Street, a 640-square-foot loading area, parking ramps, and the two retail spaces facing Townsend Street. The second floor would contain 24,000 square feet dedicated to parking, including parking ramps. The podium level on Floor 3 would be about 14,421 square feet, with nine residential units; approximately 2,767 square feet of pool, pool deck, and fitness center; approximately 1,606 square feet of corridor, elevators, and exit stair; and approximately 6,066 gross square feet of common open space. Floors 4 through 7 would be about 14,686 square feet each with 12 residential units per floor. Floor 8 would be about 11,516 square feet with nine units, and the top floor (Floor 9) would contain about 9,654 square feet with five units and two private terraces.

The frontages on Townsend Street and Colin P. Kelly Jr. Street are 117 feet 6 inches and 247 feet 8 inches long, respectively. Vehicular access to the parking garage would be on Colin P. Kelly Jr. Street on the east side of the building via an existing opening in the historic building. The garage would contain 74 vehicle parking spaces, of which three would be handicapped-accessible, and six bicycle spaces. There would be one loading dock on Colin P. Kelly Jr. Street, adjacent to the lobby entrance, which would provide pedestrian access. Development of the site would require excavation

of less than 50 cubic yards of soil for footings and foundation. The building would be constructed on a spread-footing foundation.

Project construction would take about 14 months. Assuming construction begins in late 2006, completion of the proposed project would be in late 2007. The project sponsor is Lambert Development LLC, and the project architect is SB Architects (Sandy Babcock).

D. PROJECT APPROVAL REQUIREMENTS

This EIR will undergo a public comment period as noted on the cover of this report, including a public hearing before the Agency Commission on the Draft EIR. Following the public comment period, responses to written and oral comments will be prepared and published in a Comments and Responses document, and presented to the Agency Commission for certification as to accuracy, objectivity, and completeness. No approvals or permits may be issued before the Final EIR is certified by the Agency Commission.

The proposed project would require review by the Agency for consistency with the *Redevelopment Plan*, the *Design for Development*, the *General Plan*, the *Northeastern Waterfront Plan*, and other relevant plans. The proposed project would also require the following actions (under the existing zoning regulations), with acting bodies shown in italics:

- Building and Demolition Permit. *Department of Building Inspection and Agency approval*
- OPA with the Agency. *Agency Commission approval*

III. ENVIRONMENTAL SETTING AND IMPACTS

On the basis of an Initial Study, dated January 13, 2006, the Agency determined that an EIR is required for the 72 Townsend Street project. The Initial Study found that physical environmental effects related to visual quality and urban design, light and glare, agricultural resources, air quality/climate, wind, shadow, biology, archeological resources, geology/topography, hazards, hydrology and water quality, land use, noise, population and housing, utilities/public services, and recreation would not be considered significant or would be reduced to less than significant levels by recommended mitigation measures, and required no further discussion. (See Appendix A, Notice of Preparation/Initial Study.) Therefore, the EIR does not further analyze these issues. On the basis of the Initial Study, project-specific effects and/or cumulative impacts that relate to historical resources, transportation, and growth inducement have been determined to be potentially significant, and are analyzed in this EIR. In addition, this EIR includes a discussion of land use for informational purposes. The analyses below and those in the Initial Study account for construction and operational impacts, where relevant. For example, construction traffic effects are discussed in Section III.D, below, and construction-related air emissions are addressed in the Initial Study (Appendix A, pages 19 and 20) with mitigation measures to reduce construction-generated emissions presented in the Initial Study and in Chapter IV, Mitigation Measures Proposed to Minimize the Potential Adverse Impacts of the Project: Construction Air Quality. Cumulative impacts are analyzed for each topic.

Not all of the impacts presented in this chapter are physical environmental effects as defined by CEQA. Non-physical effects are included here for informational purposes only.

A. HISTORICAL RESOURCES

The Initial Study analyzed potential impacts on archaeological resources of the proposed project and concluded that implementation of Mitigation Measure CR-5 would reduce the potentially significant disturbance, damage, or loss of archeological resources during project construction to a less than significant level, and that archeological resources require no further analysis. (See Appendix A, Notice of Preparation/Initial Study.) The Initial Study also determined that, even with implementation of Mitigation Measures CR-1 through CR-4, the proposed project's impact on historic resources would remain a significant and unavoidable impact, and will be examined in more detail in the EIR. The proposed project's impacts on historic resources are discussed below.

SETTING

HISTORIC ARCHITECTURE

This section includes information on the history, architecture, and significance of the existing building on the project site, the Hooper's South End Grain Warehouse, 64-72 Townsend Street, constructed in 1874. The information presented in this section is based on an evaluation of the project building by the architectural historians Page & Turnbull,^{4,5} as well as documents prepared for the Landmarks Preservation Advisory Board on the South End Historic District.^{6,7}

South End Historic District

The proposed project is located in the South End Historic District established under ordinance by the City in 1990. The irregular-shaped district is roughly bounded by Bryant Street on the north, King Street on the south, Third Street on the west, and First Street on the east, and encompasses 73 Assessor's Lots. The South End Historic District includes a concentration of diverse warehouse buildings that were constructed during the century between 1860 and 1960 and which served the waterfront and port facilities that were instrumental in San Francisco's development into one of the world's great cities.

⁴ *Hooper's South End Grain Warehouse Historic Resource Evaluation, 72 Townsend Street, San Francisco, California*, Page & Turnbull, August 15, 2005.

⁵ *Hooper's South End Grain Warehouse Memorandum*, Page & Turnbull, June 16, 2005.

⁶ *South End Historic District Case Report*, Paul Lord, Jr., Prepared for the Landmarks Preservation Advisory Board, February 5, 1990.

⁷ *South End Historic District*, Michael Schwarzer, Prepared for the Landmarks Preservation Advisory Board, January 29, 1986.

The primary period of historical significance of the district, about 1867 to 1935, comprises the era when the waterfront was a vital component of the State's maritime commerce. The natural suitability of San Francisco's port, which was sheltered, with deep water, made it readily accessible to overseas markets and to a network of rivers and canals east of San Francisco, and facilitated the distribution and importation of goods to and from inland areas. The export of agricultural products and mineral resources, including gold, and the importation of finished goods, constituted the primary basis of San Francisco's economy during the district's period of historical significance. Consequently, a vast amount of storage space was required to serve the historic maritime industry in the City, whether it was short-term accommodation of irregularities in commerce traffic or more lengthy storage in anticipation of future market demands. Since San Francisco functioned as a distribution center, temporary storage was also often required before the subsequent shipment of goods to a secondary market. In response to these needs, an extensive warehouse district developed over time in proximity to the waterfront.

The rich diversity in architectural forms represented in the South End Historic District provided a compelling rationale for its designation and the protection it affords to the historic buildings within its confines. At least eleven properties in the district are either on or have been determined eligible for inclusion on the National Register. Hooper's Warehouse, the existing historic building on the proposed project site, has been assigned a designation of "2S2" by the OHP, indicating that it has been determined eligible for the National Register through the Section 106 process, and is listed in the California Register.

Only eight buildings in the district, including Hooper's Warehouse, predate the 1906 earthquake. The majority of the buildings were constructed between 1906 and 1929, during which time maritime commerce increased dramatically. While the buildings predating the earthquake were utilitarian structures whose design was governed by functional considerations, with aesthetic contributions generally occurring by means that had only low-cost ramifications, most warehouses constructed after 1906 were designed by academic architects, who favored greater articulation in building façades and were typically influenced by the European Beaux Arts style. Thus, while nineteenth century buildings presented large expanses of unbroken brick walls, such as along Second Street, the early twentieth century buildings favored concrete construction with embellishments such as parapets,

simple cornices, pilasters, and advertising signs. Nonetheless, due to the size of many warehouse buildings and the restraint employed on ornamentation, large expanses of blank walls were still common.

The evolving design of warehouses in the South End Historic District was driven substantially by changes in the technology of commerce. Early warehouses were generally one story in height, both due to the availability of inexpensive land in proximity to waterfront piers and to the need to permit the passage of wagons and drays to interior storage areas. By 1900, the importance of rail transport led to the extension of railroad spurs into building interiors, leading to larger doorways. The rising of land costs also drove a move to multi-story buildings, facilitated by the availability of affordable freight elevators by this time. This trend was reversed following the invention of the forklift in the 1930s, because forklifts would usually not fit inside elevators with their cargo, rendering movement of goods to, from, and within upper stories logistically difficult. This constraint has led to the nearly universal construction of one-story warehouses in the United States since 1945.

Historical Significance of the Project Building

Hooper's Warehouse was built in 1874 by trader John Hooper for the storage of grain prior to transshipment out of state. When it was constructed, it represented the most modern warehouse techniques, whose primary considerations were fire-resistance, structural stability, security, and cost-efficiency. Grain had emerged in the early years of Statehood as California's first export crop, leading to the establishment of at least four warehouses in the South End area specializing in grain. By 1898, grain exports of 40 million bushels had established California as the leading grain-producing state in the nation, and secured a dominance in agricultural production that has continued uninterrupted until the present.

Following the purchase of Hooper's Warehouse by the Morton Draying and Warehouse Company in 1888, the building became known as Morton's South End Warehouse. Later, the warehouse (now called the South End U.S. Bonded Warehouse) was the flagship building of the South End Warehouse Company, formed in 1902 and comprising a total of four warehouses. The company's central building shifted down the block when the four-story brick warehouse at 625 Second Street was completed in 1905. By this time, storage in the former Hooper's Warehouse had shifted from grain to general merchandise, primarily iron pipe and cement.

The project building was one of the few buildings in the district to be spared by the catastrophic fire that leveled large sections of San Francisco following the 1906 earthquake. As the area was reconstructed with concrete, multi-story warehouses, one-story warehouses like Hooper's became obsolete. By 1911 the building had been subdivided into a restaurant and saloon at the Townsend Street frontage, and the rear was utilized for storage. This allocation of space, with a commercial front and rear storage, continued until the building was renovated in 1999.

1999 Adaptive Reuse Project

Hooper's Warehouse was substantially altered in 1999 as part of a seismic upgrade and adaptive reuse project. The building was divided into three sections to provide a retail/restaurant space along the entire Townsend Street façade, office space in the middle, and a 13-car parking garage at the rear. The building was covered by a thick, exaggerated dash coat of new stucco on top of the original stucco, and the façades along both Townsend and Colin P. Kelly Jr. Streets were modified. New door openings were created and all original doors and windows were removed. Along Townsend Street, a new door was added to the westernmost bay of the five-bay façade, and a large storefront window system replaced the (non-original) walls in the central and two eastern bays. A new exposed brick arch, resembling the original building arches, was added around the main entrance in the central bay. Along the Colin P. Kelly Jr. Street façade, four narrow arched doors with transoms and two wide service doors topped by arched vents were added. Although two original, wide arched openings were preserved, the bricks forming the arches were replaced.

Interior modifications also necessitated removal of original building components, most notably the floor. New timber trusses were added to the existing roof trusses, for increased strength, and new ledges, plates, and bolts were added to the roof framing system. The skylights were replaced, though the original framing was apparently retained. An original brick wall was retained to separate the planned retail/restaurant and office uses, while a new concrete demising wall was added between the office and garage spaces. A partial second story was added above the retail/restaurant and office spaces, and a full second story was added above the garage, to provide additional office space. A layer of shotcrete was applied to the interior face of all four exterior walls.

In their evaluation, Page & Turnbull concluded that many historic elements and characteristics were lost in the 1999 adaptive reuse of Hooper's Warehouse. Although the building retains the original long, low massing, the sense of solidity and enclosure on the Townsend Street façade has been lost. The dash coat of stucco diminishes the crispness of the cornice and other historic projections on the building, and the more recessed doors and windows create deeper shadows than originally shown. However, despite the increase in openings along Colin P. Kelly Jr. Street, this façade retains much of its original solid character.

POLICY AND REGULATORY FRAMEWORK

The evaluation of properties for potential impacts to "historical resources" under CEQA is a two-step process; the first step is to determine whether the property is an "historical resource" as defined in Section 15064.5(a)(3) of CEQA, and if it is an "historical resource," the second is to evaluate whether the action or project proposed by the sponsor would cause a "substantial adverse change" to the "historical resource."

This section examines the national, state, and local historical ratings assigned to Hooper's Warehouse in state and local surveys and evaluations.

The Foundation for San Francisco's Architectural Heritage

The Foundation for San Francisco Architectural Heritage ("Heritage") is the City's oldest not-for-profit organization dedicated to increasing awareness and preservation of San Francisco's unique architectural heritage. Heritage has completed several large-scale, intensive surveys throughout the City, the most important of which was the 1977-1978 Downtown Survey. This survey, published in book form as *Splendid Survivors* in 1978, forms the basis of San Francisco's *Downtown Plan*. In 1984, the survey was expanded from the Downtown to the South of Market area, in a project called *Splendid Extended*. Heritage ratings, which range from A (highest importance) to D (minor or no importance), are analogous to Categories I through V of Article 11 of the *Planning Code*, although the Planning Department uses its own methodology to reach its independent findings.

The Hooper's Warehouse building has been rated "B-Major Importance" by Heritage's *Splendid Extended*. These are buildings "which are of individual importance by virtue of architectural, historical and environmental criteria. These buildings tend to stand out for their overall quality rather

than any particular outstanding characteristics. B-group buildings are eligible for the National Register, and are of secondary priority for City Landmark status.” Built in 1874, a rare survivor of the first generation of warehouse construction, the building’s age and style were judged to be of excellent significance. (Four levels of ratings—Excellent, Very Good, Good, and Fair/Poor—are used in Heritage's evaluation system.) The brick and timber construction, the association with John Hooper, and the role the building played and continues to play in defining the larger warehouse district were judged to be of very good significance. It should be noted that the Heritage rating of the building in 1984 predated substantial modifications made to the building in 1999 (see 1999 Adaptive Reuse Project, above).

California Historical Resources Status Code

Properties listed or under review by the OHP are assigned Status Codes of “1” to “7” in order to establish a baseline record of their historical significance. Properties with a Status Code of “1” are listed in the California or National Register, while those with Status Code “2” have been formally determined eligible for such listing. Properties with Status Codes “3” or “4” appear to be eligible for listing in either register through survey evaluation. Properties with Status Code of “5” are typically locally significant or of contextual importance. Status Code “6” is assigned to properties that have been found ineligible for listing in any register, and Status Code “7” indicates that a property has not yet been evaluated by OHP. Hooper’s Warehouse has a Status Code of “2S2,” indicating that it has been determined eligible for listing in the National Register by consensus through the Section 106 process, and has already been listed in the California Register.⁸

National Register of Historic Places

Hooper’s Warehouse was formally determined individually eligible for the National Register on February 23, 1982.⁹

South End Historic District

Many other warehouses were constructed between 1867 and 1920 in the area around Hooper’s Warehouse, and the City of San Francisco has recognized the assemblage as the South End Historic

⁸ *Hooper’s South End Grain Warehouse Historic Resource Evaluation*, 6.

⁹ “Historic Properties Survey Report, I-280 Transfer Concept Program,” California Department of Transportation, August, 1983, cited in: *Hooper’s South End Grain Warehouse Historic Resource Evaluation*.

District in *Planning Code* Article 11. Hooper's Warehouse is a Contributory Building to that Historic District, recognized, but not listed, in 1982. As defined in Article 10, Appendix I, Section 8 of the *Planning Code*, the Contributory Building category is assigned to buildings that date from the Historic District's period of significance, retain their historic integrity, and are of the highest importance in maintaining the character of the Historic District.

EVALUATION OF THE HOOPER'S SOUTH END GRAIN WAREHOUSE BUILDING

CEQA allows the Agency, as the lead agency, to make a determination that a property is historically significant, if the resource meets the criteria for listing on the California Register (CEQA Section 21084.1 and CEQA Guidelines 15064.5).

The California Register criteria are used to evaluate the quality of significance in California history, architecture, archeology, engineering, and culture that may be present in districts, sites, buildings, structures, and objects. If the evaluation indicates that a resource is present, it must then be examined to determine if it possess integrity of location, design, setting, materials, workmanship, feeling, and association. The four criteria are defined as follows:

- o Criterion 1 (Event): Buildings that are associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States;
- o Criterion 2 (Person): Buildings that are associated with the lives of persons important to local, California, or national history;
- o Criterion 3 (Architecture): Buildings that embody the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master, or possesses high artistic values;
- o Criterion 4 (Information Potential): Buildings or sites that have yielded or have the potential to yield information important to the prehistory or history of the local area, California or the nation.

A building must also have integrity to be eligible for the California Register. Specifically, historical resources must meet one of the criteria of significance described above and retain enough of their historic character or appearance to be recognizable as historical resources and to convey the reason for their significance.

In 1983, the California Department of Transportation (“Caltrans”) performed the *I-280 Transfer Concept Program* to study the impact of a proposed freeway in the South of Market region. The study recognized the South End Historic District as a National Register-eligible district and identified several properties within the district as individually eligible for the National Register. The nomination was never formally submitted, but a formal determination of eligibility for the National Register automatically places a property on the California Register. With an OHP Status Code of “2S2,” based on the Caltrans study, Hooper’s Warehouse is automatically listed in the California Register. No formal nomination has been written; therefore, no criteria for eligibility have been formally established. Heritage’s Downtown Inventory stated that Hooper’s Warehouse was of “excellent” importance because of its style and association with the Hooper family. Therefore, Criterion 2 (Person) and Criterion 3 (Architecture) are the reasons for the building’s significance.

Criterion 2 (Person): John Hooper built a lumber and mining fortune in San Francisco just after the Gold Rush and his six sons continued his success into trading and banking. At the end of his life, Hooper became involved in the grain trade and Hooper’s Warehouse is significant as a product of his interests and business success.

Criterion 3 (Architecture): Hooper’s Warehouse is the second-oldest building in the eligible South End Historic District and the oldest one-story brick warehouse in the district. Hooper’s is one of only a handful of survivors of the 1906 Earthquake and Fire and, because warehouse construction changed dramatically following 1906, it is the oldest of only a few first generation warehouses in San Francisco. Not only typical of the period, Hooper’s Warehouse is a rare survivor.

Integrity

In addition to being determined eligible under at least one of the four California Register criteria, properties deemed to be significant must also have sufficient historical integrity. The concept of integrity is essential to identifying the important physical characteristics of historical resources and hence, evaluating adverse change. For the purposes of the California Register, integrity is defined as “the authenticity of an historical resource’s physical identity evidenced by the survival of characteristics that existed during the resource’s period of significance” (California Code of Regulations Title 14, Chapter 11.5). A property is examined for seven variables or aspects that together comprise integrity. These aspects, which are based closely on the National Register, are

location, design, setting, materials, workmanship, feeling, and association. *National Register Bulletin 15, How to Apply the National Register Criteria for Evaluation* defines these seven characteristics:

- *Location* is the place where the historic property was constructed.
- *Design* is the combination of elements that create the form, plans, space, structure, and style of the property.
- *Setting* addresses the physical environment of the historic property inclusive of the landscape and spatial relationships of the buildings.
- *Materials* refer to the physical elements that were combined or deposited during a particular period of time and in a particular pattern of configuration to form the historic property.
- *Workmanship* is the physical evidence of the crafts of a particular culture or people during any given period in history.
- *Feeling* is the property's expression of the aesthetic or historic sense of a particular period of time.
- *Association* is the direct link between an important historic event or person and an historic property.

In 1999, Northshore Resources Group, working with Lerner + Associates Architects and Culley & Associates Structural Engineers, substantially altered Hooper's Warehouse. Previously, the building accommodated a store, restaurant, and bar along Townsend, with storage at the rear. The 1999 project divided the building into three zones, with the entire Townsend façade dedicated to a retail/restaurant use, office space in the middle, and a parking garage at the rear. This change in use necessitated the alteration of many openings as well as the construction of new windows, doors, and skylights in the original shell. The project also included the addition of new mechanical, electrical, and plumbing systems as well as a substantial seismic upgrade. These changes, in addition to the cumulative changes that took place over time, resulted in the loss of some of the building's integrity.

Location: The location of the building has not changed over time and retains integrity of location.

Design: While alterations have occurred, Hooper's Warehouse remains a one-story structure with four distinct structural units and a low parapet. Especially along Colin P. Kelly Jr. Street, the building retains its original sense of solidity. The building retains its integrity of design.

III. ENVIRONMENTAL SETTING AND IMPACTS

A. Historical Resources

Setting: The area around Hooper's Warehouse has been significantly altered over time. Originally located adjacent to the shoreline, amidst small warehouses, the building is now several blocks from the seawall. Located on the edge of the South End Historic District, Hooper's Warehouse is now overshadowed by glass skyscrapers to the south and east. In addition, street trees have been planted along both Townsend and Colin P. Kelly Jr. Streets, creating a distance between the building and the street. Standing on the border of the South End Historic District, Hooper's Warehouse's immediate surroundings have been significantly altered, but Hooper's contributes to the historic district to the north and west. Although the integrity of the area south and east has been lost, Hooper's Warehouse is key to maintaining the integrity of the area to the north and west and this setting retains its integrity.

Materials: Originally a simple storage structure, many of the materials of Hooper's Warehouse have been lost. The exterior walls have been diminished by the addition of storefront windows and doors and the loss of all historic windows, doors and skylights. A new stucco exterior finish and interior shear walls have combined to encase the original exterior walls completely. The stucco has also obscured the original brick frames, pilasters, and moldings. The original floor is lost. It is likely that there were originally three brick demising walls, separating each of the structural bays, but only one remains today. New skylights have been installed in the original roof. These changes represent a significant loss of material integrity at Hooper's Warehouse.

Workmanship: Hooper's Warehouse was built as a simple brick building, with a heavy-timber structural system. Although the non-historic stucco finish covers the brick and its system of simplified classical details, the character is still able to be perceived. While supplemented by steel and lumber supports, the heavy-timber frame of the building is highlighted on the interior of the building. Hooper's Warehouse retains its integrity of workmanship.

Feeling: A one-story brick warehouse, Hooper's Warehouse still communicates its status as a rare survivor of the nineteenth century San Francisco waterfront and consequently retains its integrity of feeling.

Association: Associated with John Hooper and the Hooper family, Hooper's Warehouse is significant as a warehouse. As a series of open spaces, the building still communicates its character as a warehouse and maintains its integrity of association.

Many historic elements and characteristics were lost in the 1999 adaptive reuse of Hooper's Warehouse, including the historic stucco finish, the historic floor, and the original sense of solidity and enclosure along the Townsend Street façade. Life-safety and modern code requirements necessitated some of these changes. On the other hand, some elements were retained, including the exterior walls, one interior wall, the heavy-timber structural system, and part of the roof sheathing. Moreover, the building retains its one story, long and low form that is characteristic of the first phase of warehouse construction at the San Francisco waterfront. Although the building has lost its integrity of materials, it retains its integrity of location, design, setting, workmanship, feeling, and association, and therefore retains its overall integrity.

CONCLUSION: HISTORICAL RESOURCES

In their analysis, Page & Turnbull concluded that Hooper's South End Grain Warehouse qualifies as an historical resource under CEQA. A building may qualify as an historic resource if it falls within at least one of four categories listed in CEQA Guidelines Section 15064.5(a).¹⁰

The OHP has assigned Hooper's Warehouse a Status Code of "2S2," meaning that it is an "individual property determined eligible for the National Register by a consensus through Section 106 process.

¹⁰ CEQA Guidelines Section 15064.5(a) includes the following four categories:

- 1) A resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources (Pub. Res. Code SS5024.1, Title 14 CCR, Section 4850 et seq.).
- 2) A resource included in a local register of historical resources, as defined in Section 5020.1(k) of the Public Resources Code or identified as significant in an historical resource survey meeting the requirements of section 5024.1 (g) of the Public Resources Code, shall be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.
- 3) Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the California Register of Historical Resources (Pub. Res. Code SS5024.1, Title 14, CCR, Section 4852).
- 4) The fact that a resource is not listed in, or determined to be eligible for listing in the California Register of Historical Resources, not included in a local register of historical resources (pursuant to section 5020.1 (k) of the Pub. Resources Code), or identified in an historical resources survey (meeting the criteria in section 5024.1(g) of the Pub. Resources Code) does not preclude a lead agency from determining that the resource may be an historical resource as defined in Pub. Resources Code sections 5020.1 (j) or 5024.1.

Listed in the California Register.” Based on this Status Code, Hooper’s Warehouse appears to be a “Presumed Historic Resource pursuant to the City’s Guidelines and CEQA Guidelines Section 15064.5(a)(3).” The analysis by Page & Turnbull upheld this finding, based on the building’s eligibility for listing in the National Register and California Register.

IMPACTS

SIGNIFICANCE CRITERIA

Pursuant to *CEQA Guidelines* Section 15064.5, a project would have a significant effect if it would cause a substantial adverse change in the significance of an historical resource. A “substantial adverse change” is defined by CEQA Guidelines Section 15064.5 as “demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired.”

IMPACT OF THE PROPOSED PROJECT

The Secretary of the Interior’s Standards for Rehabilitation

The *Secretary of the Interior’s Standards for Rehabilitation & Illustrated Guidelines for Rehabilitating Historic Buildings* provide guidance for reviewing proposed work to historic properties.¹¹ The *Secretary of the Interior’s Standards* are used by Federal agencies in evaluating work on historic properties.

The *Secretary of the Interior’s Standards* have also been adopted by local government bodies across the country, including the San Francisco Landmarks Preservation Advisory Board, for reviewing proposed work to historic properties under local preservation ordinances. The *Secretary of the Interior’s Standards* are a useful analytic tool for understanding and describing the potential impacts of substantial changes to historic resources. Conformance with the *Standards* does not determine whether a project would cause a substantial adverse change in the significance of an historic

¹¹ *Secretary of the Interior’s Standards for Rehabilitation & Illustrated Guidelines for Rehabilitating Historic Buildings*, U.S. Department of Interior National Park Service Cultural Resources, Preservation Assistance Division, 1992. The *Secretary of the Interior’s Standards*, revised in 1992, were codified as 36 CFR Part 68.3 in the July 12, 1995 Federal Register (Vol. 60, No. 133). The revision replaces the 1978 and 1983 versions of 36 CFR 68 entitled “The Secretary of the Interior’s Standards for Historic Preservation Projects.” The 36 CFR 68.3 Standards are applied to all grant-in-aid development projects assisted through the National Historic Preservation Fund. Another set of Standards, 36 CFR 67.7, focuses on “certified historic structures” as defined by the IRS Code of 1986. The Standards in 36 CFR 67.7 are used primarily when property owners are seeking certification for federal tax benefits. The two sets of Standards vary slightly, but the differences are primarily technical and non-substantive in nature. The Guidelines, however, are not codified in the Federal Register.

resource. Rather, projects that comply with the *Secretary of the Interior's Standards* benefit from a regulatory presumption that they would have a less than significant adverse impact on an historic resource.¹² Projects that do not comply with the *Secretary of the Interior's Standards* may or may not cause a substantial adverse change in the significance of an historic resource. The following analysis applies each of the *Secretary of the Interior's Standards* to the proposed project.

Rehabilitation Standard 1: *A property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces and spatial relationships.*

Discussion: Hooper's Warehouse was a mixed-use commercial/warehouse space from 1911 until 1999. In 1999 the building was adapted to become a mixed-use retail/restaurant/office space, with parking at the rear. The proposed project would dedicate the front quarter of the building to retail space, with parking, lobby and service spaces to the rear. A new seven-story residential building would be built atop the one-story warehouse. The new residential structure would necessitate the demolition the roof structure, one of the remaining historic elements of the building, as well as the heavy timber post and beam structural system. The new building would fundamentally alter the appearance of the building, obscuring its character as a one-story warehouse of the pre-1906 period.

The construction of the residential building would cause the loss of historic fabric and character, and would therefore not be in compliance with Standard 1.

Rehabilitation Standard 2: *The historic character of a property will be retained and presented. The removal of distinctive materials or alteration of features, spaces, and spatial relationships that characterize the property will be avoided.*

Discussion: The heavy timber roof trusses and much of the original heavy timber post and beam structural system would be lost in the construction of the new residential building. More significant than this loss of historic fabric, however, is the fact that the new residential building would cause the loss of the one-story character of the building.

¹² CEQA Guidelines subsection 15064.5(b)(3).

The construction of the residential building would cause the loss of historic fabric and significant alteration of the spatial relationships of the building, and would therefore not be in compliance with Standard 2.

Rehabilitation Standard 3: *Each property will be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or elements from other historic properties, will not be undertaken.*

Discussion: No creation of false history or addition of conjectural features would be undertaken. The proposed addition would be designed in a contemporary style, sympathetic but distinct from the original building. The proposed project would be in compliance with Standard 3.

Rehabilitation Standard 4: *Changes to a property that have acquired historic significance in their own right will be retained and preserved.*

Discussion: The changes to the building that occurred during the 1999 adaptive reuse of the building, including seismic strengthening, new systems, new toilets, new mezzanines, and new fenestration have not gained significance. This also includes the new brick entry arch on the Townsend Street façade. The three brick entry arches on the Colin P. Kelly Jr. Street façade were rebuilt in 1999, probably because of seismic concerns. While no longer historic, they replicate what was once there and should be preserved. The proposed project would be in compliance with Standard 4.

Rehabilitation Standard 5: *Distinctive materials, features, finishes and construction techniques or examples of craftsmanship that characterize a property will be preserved.*

Discussion: The proposed project would cause the loss of the roof trusses and heavy timber post and beam structural system. Beyond these key elements, however, the proposed project will retain the four historic brick exterior walls and the one historic interior wall. The exterior walls, with their modified classical details, would be preserved.

The roof and structural system are distinctive features and their loss would not be in compliance with Standard 5.

Rehabilitation Standard 6: *Deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature will match the old in design, color, texture, and, where possible, materials. Replacement of missing features will be substantiated by documentary and physical evidence.*

Discussion: The 1999 adaptive reuse project repaired or replaced most of the deteriorated features, including roof sheathing, windows, and skylights. If deteriorated historic elements are revealed during the project, they would be restored, and therefore, the proposed project would be in compliance with Standard 6.

Rehabilitation Standard 7: *Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.*

Discussion: The proposed project would be in compliance with Standard 7. If chemical or physical treatments are necessary, the project sponsor would use the gentlest treatment available. Treatments that cause damage to historic materials would not be used.

Rehabilitation Standard 8: *Archeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.*

Discussion: The proposed project would be in compliance with Standard 8. Foundations would be strengthened as part of the proposed project and additional excavation may occur below the seven-story addition. If any archeological material should be encountered, construction would be halted and proper mitigation undertaken.

Rehabilitation Standard 9: *New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work shall be differentiated from the old and will be compatible with the historic materials,*

features, size, scale, and proportion, and massing to protect the integrity of the property and its environment.

Discussion: According to the Guidelines, construction of an exterior addition on an historic building may seem to be essential for the new use, but it is emphasized that such new additions should be avoided if possible and considered only after it is determined that those needs cannot be met by altering secondary; i.e., non-character-defining interior spaces. If, after a thorough evaluation of interior solutions, an exterior addition is still judged to be the only viable alternative, it should be designed and constructed to be clearly differentiated from the original.¹³

The proposed residential conversion cannot be contained within the one-story warehouse. As a result, the proposed additions are essential to accommodate the project sponsor's new program.

The proposed addition would be of its own time and be differentiated from the old. While distinct from the historic building, a careful effort would be made to employ compatible materials and establish a massing pattern that complements the existing warehouse form. Concise description is difficult as the new design is still in a schematic phase, but the new building would be set at least five feet behind the face of the warehouse. In addition, the residential structure would step back from the face of the building to maintain the roofline of the original building, privileging the view from the corner of Townsend and Colin P. Kelly Jr. Streets.

In addition to providing standards for the rehabilitation for historic properties, the National Park Service also offers guidelines for restoration. In regard to new additions, the Guidelines do not recommend "designing and constructing new additions that result in the diminution or loss of the historic character of the resource..." They also do not recommend "constructing a rooftop addition so that the historic appearance of the building is radically changed."¹⁴

¹³ *The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Restoring, & Reconstructing Historic Buildings* Kay D. Weeks and Anne E. Grimmer (Washington DC, 1995), 113.

¹⁴ Ibid.

Despite all ameliorating design efforts, the new building would cause the loss of historic character and the radical alteration of the appearance of the one-story warehouse; thus the proposed project does not comply with Standard 9.

Rehabilitation Standard 10: *New additions and adjacent or related new construction will be undertaken in such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.*

Discussion: The historic heavy timber roof structure would be removed, as would most of the heavy timber post and beam structural system. In addition, new foundations may impact the brick exterior walls. The principal of reversibility should be incorporated into the design and the final design should be reviewed for compliance; however, due to the removal of the historic roof structure and most of the structural system, the proposed project would not be in compliance with Standard 10.

CONCLUSION: HISTORICAL RESOURCES

Built in 1874, Hooper's Warehouse was one of a small number of buildings in the warehouse district of San Francisco to survive the 1906 Earthquake and Fire. As warehouse practices changed in the reconstruction following 1906, Hooper's Warehouse is not only typical of its period, but is a rare survivor of the first generation of warehouse construction in San Francisco. According to the OHP, Hooper's Warehouse has a Status Code of "2S2," indicating that it has been determined eligible for the National Register by consensus through the Section 106 process, and is listed in the California Register. Page & Turnbull's analysis supports this finding, as well as supporting its eligibility for listing in the California Register under Criterion 2 (Person) and Criterion 3 (Architecture). Therefore, the Hooper's Warehouse building at 64-72 Townsend Street is considered a historical resource for CEQA purposes.

The proposed project would retain the existing building façades and add a seven-story residential structure on top of the existing warehouse. The addition would require the removal of the existing roof, including the original heavy timber posts and trusses. The proposed residential structure would be broken into three bays that correspond to three of the four bays on the Colin P. Kelly Jr. Street façade of the existing warehouse building. Although the 1999 modifications to the building degraded the historic character of the building in terms of surface finish and fenestration, they did not alter the

overall form of the building. This form would, however, be substantially altered by the addition of the residential structure, which would be inconsistent with the *Secretary of the Interior's Standards*. Implementation of Mitigation Measures CR-1 through CR-4 (pages 84 and 85), would partially reverse the changes of the 1999 adaptive reuse project by removing the non-historic stucco finish, decreasing the level of fenestration on the Townsend Street façade, replacing the non-historic chamfered corner with a storefront aligned with the streets, and documenting the history of the building. While these mitigation measures would reduce the impact of the proposed project, the effect of the proposed project on historic resources could not be reduced to a less than significant level, and the proposed modifications would have a significant, unavoidable adverse impact.

CUMULATIVE IMPACTS

The Hooper's Warehouse building, 64-72 Townsend Street, is located in the City-designated South End Historic District, an historic district recognized as eligible for, but not yet listed on, the National Register. In the past decade, the industrial character of the area has been gradually altered by the introduction of internet businesses, lofts, and live/work studios, many located in adapted warehouses. AT&T Park, home to Major League Baseball's San Francisco Giants, opened in 2000, just one block south of Hooper's Warehouse. This has led to the construction of high-rise office and residential towers, especially in the block between Townsend and King Streets, across the street from the ballpark. Although much of the project vicinity retains its low-scale industrial character, the area around Hooper's Warehouse has been gradually transformed into a district of new high-rise residential, office, and commercial buildings. The substantial development pressure caused by the adjacency to AT&T Park is most clearly reflected in Hooper's neighbor to the west, 699 Second Street, a two-story warehouse that also survived the 1906 Earthquake and Fire, to which a three-story residential structure was added in 2003. Hooper's Warehouse stands along the boundary of the South End Historic District, and while that District retains its integrity, an area around the Warehouse not located within the District is significantly altered, with glass high-rise buildings dominating the visual character of the area. For these reasons, construction of seven stories above the existing historic one-story warehouse would result in a considerable contribution to a significant adverse cumulative impact on historic architectural resources in the project vicinity.

B. LAND USE, ZONING, AND PLAN CONSISTENCY SETTING

LAND USE

The project site is in the northeast quadrant of San Francisco, in an area known as South Beach. The site is one block west of the South Beach Harbor and The Embarcadero, one block north of AT&T Park, and four blocks south of Moscone Convention Center. China Basin is three blocks south of the site and the Third Street Bridge crossing Mission Creek is three blocks southwest of the site. The Bay Bridge is two blocks north of the site. An on-ramp to the Bay Bridge is located at Bryant and Sterling Streets, two blocks north of the project site.

Land uses in the vicinity of the project site consist primarily of residential uses to the east and south, including the 13-story, 414-unit South Beach Marina Apartments (at 2 Townsend Street) and the 14-story, 233-unit The Towers at Embarcadero South condominiums (at One Embarcadero South), and primarily office and commercial uses to the north and west.

The project site is on the southeast corner of Townsend and Colin P. Kelly Jr. Streets. The terrain in the immediate vicinity of the site slopes upward to the northwest. The existing building on the project site, which contains retail/restaurant space and a parking garage, is currently vacant.

Adjacent to the project site to the west and occupying the remainder of this block of Townsend Street is a five-story mixed use building (88 Townsend Street) with vacant ground-floor retail space in the building's frontage on Second Street, and residential units on the upper floors. This building has a two-story base with stucco façade, with three additional red-brick-clad stories set back from the base along Townsend Street and along half of the Second Street side. Dental offices for Paul Y. Lin, DDS, were recently completed on the ground floor of this building at the Townsend Street frontage (82 Townsend Street).

Immediately north of the project building on Colin P. Kelly Jr. Street is the three-story brick office building of SOHA Engineers (48 Colin P. Kelly Jr. Street). The next building to the north is the rear of a four-story brick and stucco office building (625 Second Street) that has its frontage on the other side of the block on Second Street. The Colin P. Kelly Jr. Street side of this building has a private garage entrance. Continuing north, the last building in the block (275 Brannan Street) sits at the

southwest corner of the intersection of Colin P. Kelly Jr. and Brannan Streets. This three-story cement block office building is currently vacant and available for lease. The project block is completed by the PS Public Storage building at 611 Second Street, a six-story brick building on the southeast corner of Brannan and Second Streets.

To the east across the street from the project site at the corner of Colin P. Kelly Jr. and Townsend Streets are the 13-story Building One and seven-story Building Two of the previously mentioned South Beach Marina Apartments. An adjacent four-story cement parking garage to the north provides parking for the residents of this building. Further north on Colin P. Kelly Jr. Street is The Brannan (243 Brannan), a complex of three 16- and 17-story towers housing apartments. A ground-floor retail space in the tower at the southeast corner of Colin P. Kelly Jr. and Brannan Streets is vacant and for lease.

Directly to the south of the project site, occupying the western half of the block bounded by Townsend Street, The Embarcadero, and Second Street, are the Towers at Embarcadero South (One Embarcadero), which consists of four stucco-clad towers of condominiums ranging from 6 to 14 stories. This development, completed in 2000, includes 233 condominium units and 7,000 square feet of neighborhood-serving commercial space, such as the Paragon Restaurant and Bar (701 Second Street), which occupies the ground floor at the corner of Townsend and Second Streets. The eastern half of this block is occupied by the Steamboat Point Apartments (49 Townsend Street and 800 The Embarcadero), a complex of four-story buildings housing 108 low-income residential units and 1,500 square feet of commercial space, including the South Beach Café (800 The Embarcadero).

Land uses to the west of the project block, along the west side of Second Street, include a mix of commercial and office uses. A three-story cement building at the southwest corner of Townsend and Second Streets is occupied by the retailers Cycle Gear (700 Second Street) and West Marine (101 Townsend Street), as well as a variety of offices and an art gallery (Michael Martin Galleries). The San Francisco Fire Department Headquarters (698 Second Street) is located in a two-story cement building at the northwest corner of Townsend and Second Streets. This building also includes Salt Water Pumping Station #1. Northward to Brannan Street, the remainder of the west side of this block of Second Street is occupied, respectively, by an apparently vacant three-story brick office building (680 Second Street), a six-story cement block office building (650 Second Street), a three-

story cement block office building (640 Second Street), and a three-story brick office building (634 Second Street) housing Advent Software, Inc. At the southwest corner of Second and Brannan Streets is a six-story brick office building (301 Brannan Street) with offices for Advent Software and Photobition USA.

North of the project site, along the north side of Brannan Street are more office buildings and surface parking lots. The former Gallo Salame food processing facility at 250 Brannan Street, a Contributory Building to the South End Historic District, is now used for offices. West of this building and opposite the northern terminus of Colin P. Kelly Jr. Street is a public surface parking lot operated by U.S. Parking, with a one-story cement office building occupied by XYZ Graphics (270 Brannan Street) set back from the street. Immediately west of the parking lot is a six-story cement block and stucco office building (274 Brannan Street), with the Brannan Street Café on the ground floor. A private surface parking lot is located on the adjacent parcel to the west. Further west is a vacant three-story cement commercial building (599 Second Street) at the northeast corner of Brannan and Second Streets. Across Second Street from this building, at 300 Brannan Street, is a six-story cement office building, with the Jack Falstaff Restaurant occupying the ground floor.

EXISTING ZONING

The project site, as noted in II. Project Description, B. Project Location, is within the South Beach Subarea of the Rincon Point-South Beach Redevelopment Project Area.

Rincon Point-South Beach Redevelopment Plan and Design for Development

Implementation of the *Rincon Point-South Beach Redevelopment Plan* commenced in 1981 with the overall goal of converting the blighted Rincon Point and South Beach areas, two non-contiguous areas along the eastern waterfront, into new mixed-use waterfront neighborhoods. The Rincon Point area is encompassed by Mission Street on the north, the waterfront on the east, Harrison Street on the south, and Spear Street to the west. The South Beach area is an irregularly-shaped polygon generally bounded the waterfront to the southeast; China Basin to the south; and Third, King, Second, Brannan, and Bryant Streets and the Bay Bridge on the north and west. The *Redevelopment Plan and Design for Development* govern permitted uses, densities, and the configuration of buildings within these two areas. Permits to construct new buildings (or to alter or demolish existing ones) may not be issued unless either the proposed project conforms to the *Redevelopment Plan and Design for*

Development, or an exception is granted pursuant to provisions of the *Redevelopment Plan* and *Design for Development*. In addition, due to its location within the South End Historic District and the designation of the existing building on the site as a Contributory structure, the proposed project would be required to comply with the requirements for rehabilitation of existing structures and new development in the *Redevelopment Plan*. The project site is designated for Commercial with Alternate Residential use in the *Redevelopment Plan*; sites designated Commercial with Alternate Residential may be developed with housing, as well as commercial uses including, but not limited to, retail sales, professional offices, and eating and drinking establishments.

Development Controls

Although the *Redevelopment Plan* identifies an overall allowable density of 85 to 95 units per acre for all residential development within the South Beach Subarea, the allowable density on an individual site is a minimum of 40 units per acre and a maximum of 110 units per acre. The proposed project would have a density of about 110 units per acre.

The *Redevelopment Plan* establishes a height limitation of 40 to 105 feet for the project site, which is consistent with the City's 105-F Height and Bulk District. The Agency may grant height and density bonuses up to 15 percent of the height and density limits to projects providing low- and/or moderate-income housing. The proposed project's proposed height of 99 feet would be consistent with the height limit for the site.

The *Redevelopment Plan* limits site coverage within the South Beach Subarea, whereby the percentage of land or parking podium that may be covered by residential buildings should not exceed 65 percent. Where open space will be provided on top of a parking podium, as is the case with the proposed project, the open space should be designed to provide easy pedestrian and visual transition from the sidewalk.

The Agency uses the *Planning Code* as a guide to regulating bulk. Accordingly, the "F" bulk district, as defined in Section 270 of the *Planning Code*, limits building bulk above a height of 80 feet to a maximum length of 110 feet and a maximum diagonal dimension is 140 feet.

Development Policies

The Agency will evaluate the proposed project against the provisions of the *Redevelopment Plan* and *Design for Development*, as well as the *General Plan*, the *Northeastern Waterfront Plan*, and other relevant plans, and will consider potential conflicts with these plans as part of the decision-making process.

Design Objectives

The *Design for Development* contains the Design Objectives listed below that are relevant to the proposed project.

- Objective 1: Compliance with the objectives of the Redevelopment Plan.
- Objective 2: Compliance with the objectives and policies of the General Plan, the City Planning Code and to all applicable codes and ordinances of the City and County of San Francisco as modified by the express provisions of the Redevelopment Plan.
- Objective 3: Building scale relationship of the development to the street and to the overall urban design of the adjacent areas.
- Objective 4: The relationship of all improvements to adjacent structures to provide a harmonious composition and transition between building masses, materials, colors and textures.
- Objective 5: Integration of off-street parking with the total development, its functional relationship to the overall vehicular circulation system and its effective screening from public view.
- Objective 6: Efficient functional relationship of loading facilities to the overall vehicular circulation system.
- Objective 7: Provision of an efficient and convenient system for pedestrian movement and the quality of its environment.
- Objective 8: The preservation and enhancement of views.
- Objective 9: The appearance of the development from public rights-of-way.
- Objective 10: Harmony of landscape elements throughout the area.
- Objective 11: Integration of spaces and building forms with the topography of the site, including compliance with the recommendations of the Agency's soils engineer.
- Objective 12: Use of the most cost-effective energy efficient measures feasible.

Northeastern Waterfront Plan Policies

The project site is located within the plan area of the *Northeastern Waterfront Plan*, which contains the Objectives and Policies listed below that are relevant to the proposed project. As mentioned in Design Objectives above, the Agency will evaluate the proposed project against the provisions of applicable plans including the *Northeastern Waterfront Plan*, and will consider potential conflicts with these plans as part of the decision-making process.

Northeastern Waterfront Plan Residential Objectives and Policies

- Objective 6: To develop and maintain residential uses along the northeastern waterfront in order to assist in satisfying the city's housing needs and capitalize on the area's potential as a desirable living environment.
- Policy 6.2: Encourage the development of additional housing wherever feasible (except on new or replacement fill).
- Policy 6.3: Preserve and expand the supply of low and moderate income housing and encourage the economic integration of housing.
- Policy 6.4: Encourage the development of a variety of unit types for households of all sizes where practical.

Northeastern Waterfront Plan Transportation Objectives and Policies

- Objective 8: To facilitate the movement of people and goods within the northeastern waterfront in such a way as to minimize the adverse impact of this movement.
- Policy 8.2: Limit additional parking facilities in the Northeastern Waterfront and minimize the impact of this parking. Discourage long-term parking for work trips which could be accommodated by transit. Restrict additional parking to: (a) Short-term (less than four hour) parking facilities to meet needs of additional business, retail, restaurant, marina, and entertainment activities; (b) Long-term parking facilities for maritime activities, hotel and residential uses. To the extent possible, locate parking away from areas of intense pedestrian activity. Encourage shared parking at adjacent or nearby facilities.

Northeastern Waterfront Plan Urban Design Objectives and Policies

- Objective 10: To develop the full potential of the northeastern waterfront in accord with the unusual opportunities presented by its relation to the bay, to the operating port, fishing industry, and downtown; and to enhance its unique aesthetic qualities offered by water, topography, views of the city and bay, and its historic maritime character.

- Policy 10.6: Retain older buildings of architectural merit or historical significance to preserve the architectural and historical character of the waterfront and ensure the compatibility of new development.
- Policy 10.27: Locate buildings to minimize shadows and wind on public open spaces.
- Policy 10.28: Prohibit the use of reflective glass. Use flat glass skylights and discourage the use of dark tinted glass to increase transparency in highly visible areas.
- Policy 10.31: Conceal or otherwise limit views of any mechanical equipment, pipes, ducts and antennas, on roof surfaces. Avoid shiny or highly polished materials on roof surfaces and facades.

Northeastern Waterfront Plan South Beach Subarea Objectives and Policies

- Objective 27: To enhance the economic vitality of the area and capitalize on its unique location and environmental attributes for commercial and recreational maritime activities, maritime support uses, commercial and recreational uses, and residential development and neighborhood services.
- Objective 30: To maintain high standards in the design of new development which give rise to a new architectural identity for the shoreline, and which complements inland development.
- Policy 30.17: Develop and maintain mixed-income housing, with appropriate open space and neighborhood support uses on Blocks 3773, 3792, 3793 and portions of Blocks 3774 and 3789.
- Policy 30.18: Develop housing in small clusters of 100 to 200 units. Provide a range of building heights with no more than 40 feet in height along the Embarcadero and stepping up in height on the more inland portions to the maximum of 160 feet. In buildings fronting on Brannan Street in the 160-foot height area, create a strong base which maintains the street wall created by the residential complex to the east and the warehouse buildings to the west. Orient the mix of unit types to one and two bedrooms and include some three and four bedroom units. Pursue as the income and tenure goals, a mix of 20 percent low, 30 percent moderate and 50 percent middle and upper income, and a mix of rental, cooperative, and condominium units.
- Policy 30.19: Organize the housing clusters to maximize views to the water and downtown as well as sun exposure while minimizing shading of open space and blocking of views from adjacent areas. To the extent feasible, locate family units on ground floor levels adjacent to open space and recreational areas. Provide personalized entryways and private open space to all units. Orient the buildings to provide privacy and security.
- Policy 30.20: Design the structures and dwelling units to express character and diversity. Incorporate high standards of indoor and outdoor private space design and convenience and use high quality materials. Express a human scale in surfaces and materials with articulated facades, bay windows, cornice lines, roofscapes, overhangs,

towers and chimneys. Use varied light colors to break up building mass and liven surfaces. Design the housing complex to be energy efficient, and consider the use of passive solar systems.

- Policy 30.21: Incorporate most parking as part of the building within housing clusters. Because garages may be only a half level below grade due to the high water table, landscape or buffer exposed garage edges. Locate residences above parking structures to stabilize them and minimize differential settlement. To the extent feasible, improve the portions of the garage roof not covered by structures for walkways and recreation areas. Use tree wells to allow large trees to grow within residential clusters. Design parking structures to have controlled vehicular access points and direct access to residential units for increased security. Provide additional guest and service parking for the residential units in street rights-of-way or adjacent to the clusters.
- Policy 30.22: Do not permit buildings to exceed 65 percent coverage of land or parking podium. To the maximum extent feasible, provide open space at ground level and provide planting in the ground. Ensure that any open space on top of a podium provides easy pedestrian and visual transition from the sidewalk.
- Policy 30.23: Design structures to protect views of the water down street corridors from the residential areas. Carefully consider roof design and conceal roof equipment because of its visibility from adjacent residences. Landscape flat roofs and finish sloped roofs in attractive materials. Allow exposed parking only if the parking areas are extensively landscaped. Consider the use of turf block instead of asphalt paving.
- Policy 30.26: Close the following streets completely: Berry east of Third Street, and Second south of King Street. Close the following streets to through traffic, improve them as walkways and allow only limited local and service vehicle access: Townsend between Second and the Embarcadero, Colin P. Kelly Jr. between Townsend and Brannan, First between Brannan and the Embarcadero, and Beale between Bryant and Brannan.

Priority Policies

In November 1986, the voters of San Francisco approved Proposition M, which added Section 101.1 to the *Planning Code* to establish eight Priority Policies. These policies are: preservation and enhancement of neighborhood-serving retail uses; protection of neighborhood character; preservation and enhancement of affordable housing; discouragement of commuter automobiles; protection of industrial and service land uses from commercial office development and enhancement of resident employment and business ownership; maximization of earthquake preparedness; landmark and historic building preservation; and protection of open space. Prior to issuing a permit for any project which requires an Initial Study under CEQA; prior to issuing a permit for any demolition, conversion, or change of use; and prior to taking any action which requires a finding of consistency

with the *General Plan*, the City is required to find that the proposed project or legislation is consistent with the Priority Policies.

IMPACTS

SIGNIFICANCE CRITERIA

A project may result in significant adverse land use impacts if it: (1) substantially disrupts or divides the physical arrangement of an established community, or (2) has a substantial impact upon the existing character of the vicinity.

CHANGE IN LAND USE

The proposed project would change land use at the project site from a vacant building to a more-intense multi-story residential building with ground-floor retail and parking garage, and would increase the density of population and the number of vehicles on the site. The proposed project would consist of a nine-story, approximately 147,320-gsf building with 74 dwelling units, 5,000 square feet of retail space, and 74 parking spaces, on a site that is currently occupied by a vacant 31-foot-tall, single-story non-residential building of about 28,175 gross square feet.

Although the proposed change in land use would constitute a substantial physical change at the corner of Townsend and Colin P. Kelly Jr. Streets, the proposed project's impacts on existing land uses would be considered less than significant.

The project site is part of the South Beach Area, which has historically been characterized by predominately low- to mid-rise industrial buildings and surface parking lots. The site is part of the South End Historic District designated by the City in 1990, and is also in the Rincon Point-South Beach Redevelopment Project Area. The area has undergone a substantial transformation over the past twenty years as numerous comparatively high-intensity residential developments have been built. During this time, about 5,300 new housing units have been added to the redevelopment area, approximately 2,500 of them within a few blocks of the project site. The completion of the 41,000-seat AT&T Park in 2000 also has contributed significantly to the evolution of the area's character.

The proposed residential use would be similar to, and consistent with, the existing high-rise residential development located adjacent to and near the site. The proposed 99-foot high, 74-unit

project would be smaller than the existing buildings across the street from the project block (the South Beach Marina Apartments are about 130 feet high with 414 units, The Towers at Embarcadero South are about 140 feet with 233 units, and The Brannan towers are about 170 feet high with 336 units).

The proposed project would further intensify the residential uses in the South Beach area, but would be compatible with the existing character of the immediate neighborhood, and would not physically divide or disrupt this community. Those surrounding uses and activities would continue on their own sites and would interrelate with each other as they do at present, and would not be substantially affected by the proposed new building uses at the site.

CONCLUSION: LAND USE

The proposed change in land use from the existing low-rise, non-residential building to the proposed high-density residential development would constitute a substantial intensification of land use at the project site. However, the change would not be a significant adverse land use impact as there are similar mid- and high-rise residential developments with similar or greater residential densities already existing near the development site, and because this portion of the South Beach area is already in transition from a district of predominantly low- to mid-rise industrial buildings and surface parking lots to a district containing numerous comparatively high-intensity residential developments.

The proposed residential use would be compatible with existing high-density residential uses in the South Beach area, and would be on a relatively small site within an already built area. The proposed development would thus continue and extend existing land uses and would not disrupt or divide an established neighborhood, nor would it adversely affect the existing character of the vicinity. Therefore, the proposed change in land use would not be a significant impact.

ZONING AND PLAN CONSISTENCY

As discussed in Chapter II. Project Description, D. Project Approval Requirements, the proposed residential project is a permitted use and would conform to the applicable controls in the *Redevelopment Plan* and the *Design for Development*. The proposed project would require review by the Agency for consistency with the *Redevelopment Plan*, the *Design for Development*, the

General Plan, the *Northeastern Waterfront Plan*, and other relevant plans. No exceptions to the *Redevelopment Plan* or *Design for Development* would be required.

The proposed project responds to the Design Objectives of the *Design for Development* in that the proposed project would comply with most of the objectives, relate to adjacent structures and the overall urban design of adjacent areas, and integrate off-street parking within the project. Design Objective 2 calls for compliance with, among other codes and plans, the objectives and policies of the *General Plan*. The proposed project would not meet Objective 27 of the *General Plan* regarding preservation (“To preserve and adaptively reuse those buildings in the area which have particular architectural or historical merit or which provide a scale and character of development consistent with the plan.”), because the proposed project would substantially alter the form of the existing historic building on the project site, which would violate the *Secretary of the Interior's Standards* for the treatment of historic properties.

CUMULATIVE LAND USE IMPACTS

Large Area Plans

There are several large area plan projects recently adopted or currently under review at the Planning Department, including the Eastern Neighborhoods community planning process¹⁵ (for Bayview Hunters Point, Showplace Square/Potrero Hill, Mission, and South of Market); the Better Neighborhoods program¹⁶; the *Rincon Hill Plan*; and the *Transbay Redevelopment Plan*. These plans will create the context for future growth throughout the City. The plan areas will compete for the limited amount of development that the market can produce, and not all of the development projected within these plans may be constructed. However, the project site is not within the plan areas of any of the large area plans and the scale of the proposed development would not create any substantial conflict with the plans.

¹⁵ *Community Planning in the Eastern Neighborhoods, Rezoning Options Workbook, First Draft*, City and County of San Francisco Planning Department, February 2003, page 91. This report is available for public review electronically on the Planning Department website, http://www.sfgov.org/site/planning_index.asp?id=25293.

¹⁶ *Better Neighborhoods 2002* City and County of San Francisco Planning Department, This report is available online for review at http://sfgov.org/site/planning_index.asp?id=25162.

Nearby Cumulative Projects

A nine-story hotel was recently approved at 144 King Street, between Second and Third Streets, approximately one block south of the proposed project. The hotel is nine stories and 105 feet in height, with approximately 131 rooms occupying 70,400 square feet, and approximately 1,600 square feet of retail space, for a total of approximately 72,000 square feet. The approved hotel, along with the proposed 72 Townsend Street project, would provide about 131 hotel rooms, 74 residential units and 74 off-street parking spaces. Although the cumulative land use impacts of the proposed projects would increase the density of residential use in South Beach, the land use impacts would be less than significant, as both the hotel and the proposed project would be up to 105 feet in height and thereby, fit within the built environment of the project vicinity.

CONCLUSION: CUMULATIVE LAND USE IMPACTS

The proposed project would add to the intensity of land use within the South Beach area, but the proposed project's 74 residential units would not be considered a significant addition to the projected residential housing stock in the City in the context of year 2025 housing projections. Secondary impacts from the proposed residential land use could affect the capacity of the local road system and transit. These potential impacts are discussed in the pertinent sections of this Draft EIR. Other possible effects on schools, parks, public services, and utilities in the future were evaluated in the Initial Study and determined to not be potentially significant. (See Appendix A.).

C. TRANSPORTATION SETTING

TRANSPORTATION STUDY AREA

For the purposes of this analysis, the transportation study area and analysis locations for traffic, transit, and parking are shown on Figure 7, page 63.

For the traffic analysis, four study intersections were identified as locations likely to be most affected by the project. The study intersections include the intersections of Townsend Street/The Embarcadero, Townsend Street/Colin P. Kelley Jr. Street, Townsend Street/Second Street, and King Street/Second Street. The parking study area is bounded by Bryant Street to the north, The Embarcadero to the east, King Street to the south, and Third Street to the west.

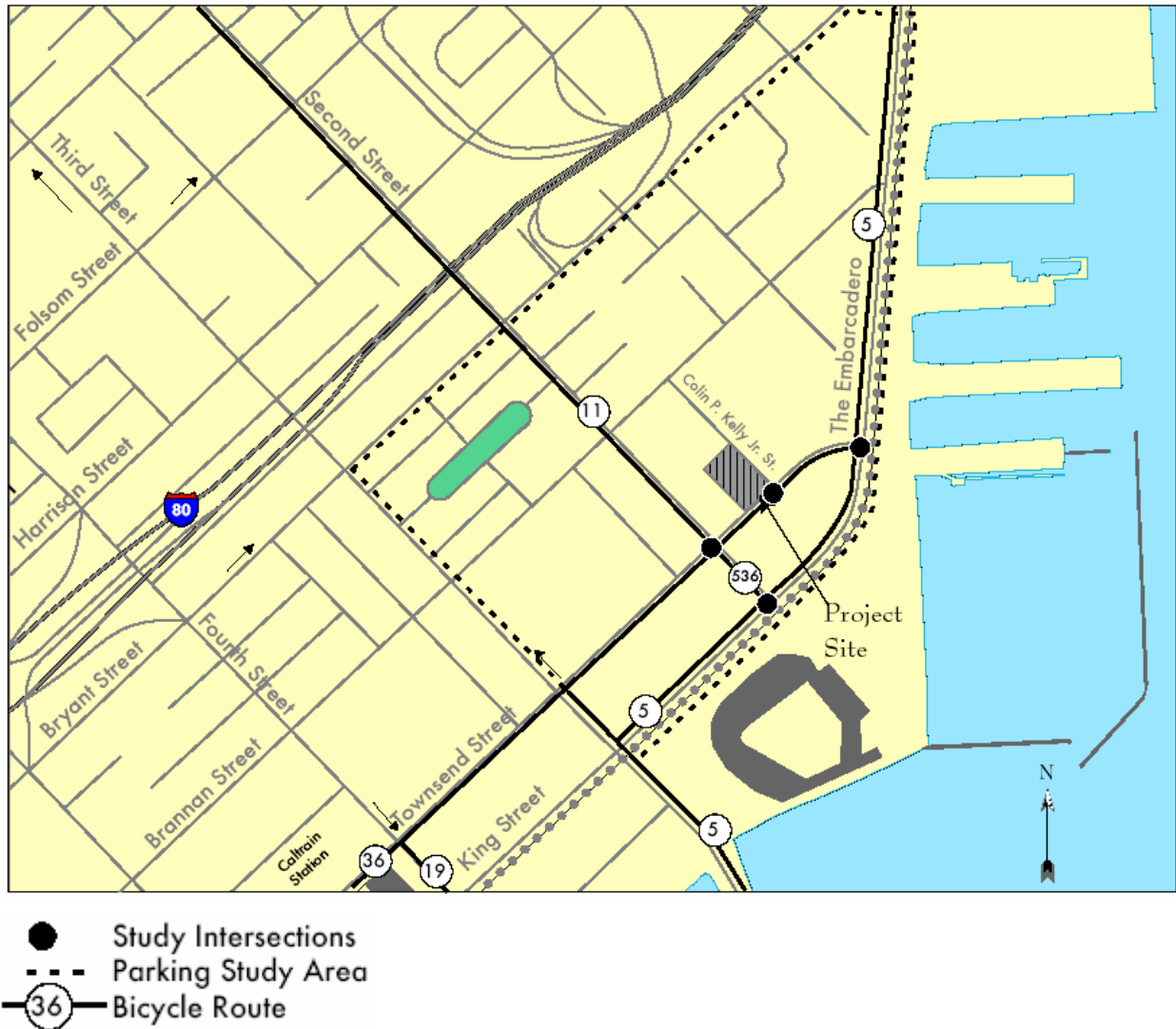
ROADWAY NETWORK

Regional Freeways

The project site is served by Interstate 80 (“I-80”), U.S. Highway 101 (“U.S. 101”), and I-280. I-80 provides the primary regional access to the project area. The San Francisco–Oakland Bay Bridge is part of I-80 and runs east and west connecting San Francisco with the East Bay. Access to the project site to and from I-80 westbound is via the Fremont Street and Harrison Street off-ramps, and the Fourth/Harrison on-ramp. Access to/from I-80 eastbound is via the Fourth/Bryant off-ramp, and the First Street, Essex Street, and Sterling Street (peak period high-occupancy vehicle only) on-ramps. I-80 joins U.S. 101 to the southwest of the project site and provides access to the Peninsula and South Bay. In addition, U.S. 101 connects San Francisco and the North Bay via the Golden Gate Bridge. I-280 provides regional access from the South of Market area of Downtown San Francisco to southwest San Francisco and the South Bay/Peninsula. Nearby access points to I-280 are located at King Street (west of Fourth Street) and Sixth Street (at Brannan Street).

Local Streets

Table 1, on page 63, presents the *General Plan* designations for the streets in the vicinity of the project site.



Source: LCW Consulting

Figure 7 Transportation Study Area

Street	Vehicular ⁽²⁾	Transit ⁽³⁾	Pedestrian ⁽⁴⁾	Bicycle ⁽⁵⁾
King Street	– Major Arterial in CMP Network – MTS Street	– Transit Preferential Street (Transit Important)	– Neighborhood Network Connection Street	–
Townsend Street	–	–	–	– Citywide Bicycle Route
Brannan Street	– Major Arterial in CMP Network – MTS Street	–	–	–
Bryant Street	– Major Arterial in CMP Network – MTS Street	– Transit Preferential Street (Transit Important)	– Neighborhood Commercial Street	–
The Embarcadero	– Major Arterial in CMP Network – MTS Street	– Transit Preferential Street	– Neighborhood Commercial Street	– Citywide Bicycle Route
Second Street	–	–	– Neighborhood Commercial Street	– Citywide Bicycle Route
Third Street	– Major Arterial in CMP Network – MTS Street	– Transit Preferential Street (Transit Important)	– Citywide Pedestrian Network Street – Neighborhood Commercial Street	–
Colin P. Kelley Jr. Street	–	–	–	–

CMP = Congestion Management Plan

MTS = Metropolitan Transportation System roadways

Appendix B of this EIR includes the definitions of the various *General Plan* designations.

Notes:

¹ “Transportation Element,” *San Francisco General Plan*.

² “Transportation Element,” Maps 6-8, pp. I.4.32-34.

³ “Transportation Element,” Map 9, p. I.4.42.

⁴ “Transportation Element,” Maps 11-12, pp. I.4.55-56.

⁵ “Transportation Element,” Map 13, p. I.4.59.

King Street

King Street runs between The Embarcadero and Division/DeHaro Streets. West of Fourth Street, King Street connects with the I-280 ramps. King Street has two 10 to 11-foot travel lanes in each direction, and parking is generally permitted on the north side of the street. In the vicinity of the proposed project, sidewalks are about 14 feet in width on the north side and 32 feet in width on the south side of the street. In the *General Plan*, King Street is identified as a Major Arterial in the CMP

Network, an MTS Street, a Transit Preferential (transit important) Street, and a Neighborhood Network Connection Street.

Townsend Street

Townsend Street runs between The Embarcadero and Eight/Division Streets. Townsend Street generally has two travel lanes in each direction, however, between Second Street and The Embarcadero, Townsend Street has one 15-foot travel lane in each direction. Parking is generally provided on both sides of the street. In the vicinity of the project site, sidewalk widths are about 11 feet, with corner bulbouts provided at Second Street and at Colin P. Kelly Jr. Street. Bicycle route #36 runs the length of Townsend Street.

Brannan Street

Brannan Street runs between The Embarcadero and Potrero/Division Streets. In the vicinity of the project site, Brannan Street has two 10 to 12-foot travel lanes in each direction, and parking on both sides of the street. Sidewalk widths on Brannan Street are generally 11 feet. The *General Plan* identifies Brannan Street between Fifth and Sixth Streets, and between Ninth and Division Streets as a Major Arterial in the CMP Network and an MTS Street.

Bryant Street

Bryant Street runs between The Embarcadero and Precita Avenue (south of Cesar Chavez Street). Between Second Street and Eleventh Street, Bryant Street is a one-way eastbound arterial with four 10 to 12-foot travel lanes. East of Second Street, Bryant Street operates one-way eastbound to the Sterling Street on-ramp to I-80, and operates both eastbound and westbound (one lane in each direction) between Sterling Street and The Embarcadero. Sidewalk widths on Brannan Street vary between 7 and 15 feet. The *General Plan* identifies Bryant Street as a Major Arterial in the CMP Network, an MTS Street, a Transit Preferential Street (transit-important), and a Neighborhood Commercial Street.

The Embarcadero

The Embarcadero runs between China Basin in the project vicinity and Taylor Street, near Fisherman's Wharf. In general, The Embarcadero has two 10½-foot travel lanes in each direction with a 30-foot wide center median for the N-Judah and F-Market transit lines, and parking on both

sides of the street. In the vicinity of the project site, sidewalks are about 15 feet on the west side of The Embarcadero, and range between 20 and 50 feet on the east (bay) side of The Embarcadero. The *General Plan* identifies The Embarcadero as a Major Arterial in the CMP Network, an MTS Street, a Transit Preferential Street, and a Neighborhood Commercial Street. In addition, The Embarcadero is part of the #5 bicycle route and is part of the Bay, Ridge, and Coast Trail, which is a recreational pedestrian/bicycle path connecting several Bay Area cities.

Second Street

Second Street runs between Market and King Streets, with two lanes in both the northbound and southbound directions. Between Mission and Market Streets, only one northbound lane is provided and all northbound traffic must turn right at Market Street. Travel lanes are generally 11 to 12 feet, and sidewalks are 10 feet in width. Second Street is designated as a Neighborhood Commercial Street in the *General Plan*. In addition, Second Street is part of the #11 bicycle route.

Third Street

Third Street runs between Bayshore Boulevard and Market Street. North of Townsend Street, Third Street is a one-way northbound roadway. In the vicinity of the proposed project, Third Street has five to six travel lanes (travel lane widths range between 10 and 11 feet), and one lane is reserved for transit vehicles. On-street parking is generally provided along both sides of the street, but is prohibited during the morning and afternoon commute periods. Sidewalks are generally 10 feet in width. In the *General Plan*, Third Street is designated as a Major Arterial in the CMP Network, a MTS street, a Transit Preferential Street (transit important), a Citywide Pedestrian Network Street and a Neighborhood Commercial Street.

Colin P. Kelley Jr. Street

Colin P. Kelley Jr. Street runs between Brannan and Townsend Streets on the block between The Embarcadero and Second Street. It is a two-way street with one eight-foot travel lane in each direction and parking on both sides of the street. Sidewalk widths are about eight feet.

INTERSECTION OPERATIONS

All of the study intersections, except for the intersection of Townsend/Colin P. Kelly Jr., are signalized. Operating characteristics of signalized intersections are described by the concept of

levels of service. LOS is a qualitative description of an intersection's performance based on the average delay per vehicle (see Appendix B, Transportation Definitions). Intersection levels of service range from LOS A, which indicates free flow or excellent conditions with short delays, to LOS F, which indicates congested or overloaded conditions with extremely long delays. LOS A through D are considered excellent to satisfactory service levels, LOS E is undesirable, and LOS F conditions are unacceptable. Unsignalized intersections are considered to operate at unsatisfactory conditions if one approach operates at LOS E or LOS F, and Caltrans signal warrants are met.

Existing weekday p.m. peak hour intersection operating conditions at the four intersections selected for analysis in the study area are presented in Table 2, below (see Figure 7 on page 63 for the locations of the four study intersections). During the weekday p.m. peak hour, the four study intersections currently operate with acceptable conditions (LOS D or better). The southbound (worst) approach at the unsignalized intersection of Townsend and Colin P. Kelly Jr. operates at LOS B.

Table 2				
Intersection Levels of Service				
Existing and Existing plus Project Conditions – Weekday PM Peak Hour				
	Existing		Existing plus Project	
	Delay¹	LOS	Delay	LOS
1. Townsend/The Embarcadero	29.0	C	29.0	C
2. Townsend/Colin P. Kelly Jr. ²	10.8 (SB)	B	11.5 (SB)	B
3. Townsend/Second	13.8	B	14.0	B
4. King/Second	22.3	C	22.9	C

Source: LCW Consulting, April 2006.

Notes:

¹ Delay presented in seconds per vehicle.

² Intersection STOP-controlled. Delay and LOS presented for worst approach. Worst approach indicated in parentheses ().

It should be noted that games and special events at the AT&T Park affect traffic operations at a number of intersections in the immediate vicinity of the project site. Transportation impacts associated with gameday conditions are most severe prior to games and after the conclusion of games. The greatest impact occurs after weekday afternoon sellout events, during the 3:30 to 4:40

p.m. period (particularly following Thursday and Friday afternoon games) when traffic, transit, and pedestrian flows exiting the ballpark coincide with the early commute period already on the transportation network before the peak commute hour.

TRANSIT NETWORK

The project site is in an area served by public transit, with both local and regional service provided near the project site by Muni, Bay Area Rapid Transit (“BART”), SamTrans, Golden Gate Transit, and AC Transit. Local service is provided by the Muni bus and light rail lines, as shown on Figure 8 on page 69. Service to and from the East Bay is provided by BART, AC Transit, and ferries; service to and from the North Bay is provided by Golden Gate Transit buses and ferries; service to and from the Peninsula and South Bay is provided by Caltrain, SamTrans, and BART.

PARKING CONDITIONS

Parking conditions were determined for the weekday midday period (1:00 to 3:00 p.m.) and the weekday evening period (6:30 to 8:00 p.m.). There are six off-street public parking facilities in the study area. With the exception of the parking lot at 270 Brannan Street, all facilities are accessory parking garages. Most of the parking facilities serve the daytime commercial uses in the area, and are open 7:00 a.m. to 7:00 p.m. However, during event days, the facilities close one hour following the end of the event. Field surveys during the weekday midday and evening periods (on a non-event day) indicated that these facilities are not at full capacity, and can accommodate additional vehicles.

On-street parking within the vicinity of the project site is generally comprised of metered and unmetered spaces, with one-hour and two-hour limits. In addition, there are several yellow loading zones located near businesses. In general, on-street parking is well-utilized throughout the day, however, during the weekday midday period field visits, available parking spaces were found on the streets adjacent to the project block. During the evening, the occupancy was observed to be lower due to the fewer night-time uses in the area.

PEDESTRIAN CONDITIONS

In the vicinity of the project site, there are eight-foot wide sidewalks on Colin P. Kelly Jr. Street and eleven foot sidewalks on Townsend Street. In the vicinity of the project site, pedestrian volumes are light to moderate throughout the day. Overall, the sidewalks and crosswalks adjacent to the project



Source: LCW Consulting

Figure 8 Transit Network

site were observed to be operating under satisfactory conditions, with pedestrians moving at normal walking speeds and with freedom to bypass other pedestrians.

It should be noted that before and after games and special events at the AT&T Park the number of pedestrians on area sidewalks increase substantially. Most pedestrians north of King Street are destined to and from Market Street and parking facilities north of the ballpark, and higher pedestrian volumes are generally limited to the north-south streets (The Embarcadero, Second Street, Third Street), although pedestrian volumes also increase on east-west streets.

BICYCLE CONDITIONS

In the vicinity of the project site, Townsend Street, Second Street, and The Embarcadero are designated Citywide Bicycle Routes (Figure 8 on page 69 indicates the designated bicycle routes). These routes are interconnected to the Citywide Bicycle Network and provide access to and from the study area from locations throughout the city. Route #11 runs along Second Street and is a Class III facility (shared travel route) between Market and King Streets. Second Street has been identified in the 2004 Bicycle Plan Update as one of the 18 priority streets where bicycle lanes should be included. Route #5 runs in both directions along The Embarcadero and King Street and is a Class II facility (signed route with bicycle lane). Route #36 runs along Townsend Street between Division Street and The Embarcadero. It is a Class II facility between Division and Third Street, and a Class III facility between Third Street and The Embarcadero.

During field surveys, a few bicyclists were observed to be riding in the vicinity of the project site, primarily along The Embarcadero. In general, during both the weekday midday and evening periods, bicycle conditions were observed to be operating acceptably, with only minor conflicts between bicyclists, pedestrians, and vehicles.

IMPACTS

SIGNIFICANCE CRITERIA

The Agency uses the significance criteria established by the Planning Department to assess transportation impacts associated with a project.

Intersections

The operational impact on signalized intersections is considered significant when project-related traffic causes the intersection levels of service to deteriorate from LOS D or better to LOS E or LOS F, or from LOS E to LOS F. The proposed project may result in significant adverse impacts at intersections that operate at LOS E or F under existing conditions depending upon the magnitude of the proposed project's contribution to the worsening of the average delay per vehicle. In addition, the proposed project would have a significant adverse impact if it would cause major traffic hazards or contribute considerably to cumulative traffic increases that would cause deterioration in levels of service to unacceptable levels.

Transit

The proposed project would have a significant effect on the environment if it would: cause a substantial increase in transit demand that could not be accommodated by the available adjacent transit capacity, resulting in unacceptable levels of transit service; or cause a substantial increase in delays or operating costs such that significant adverse impacts in transit service levels could result. With the Muni and regional transit screenlines analyses, the proposed project would have a significant effect on the transit provider if project-related transit trips would cause the capacity utilization standard to be exceeded during the p.m. peak hour.

Parking

San Francisco does not consider parking supply as part of the permanent physical environment. Parking conditions are not static, since parking supply and demand varies from day to day, from day to night, from month to month, etc. Hence, the availability of parking spaces (or lack thereof) is not a permanent physical condition, but changes over time as people change their modes and patterns of travel.

Parking deficits are considered to be social effects, rather than impacts on the physical environment. Under CEQA, a project's social impacts need not be treated as significant impacts on the environment. Environmental documents should, however, address the secondary physical impacts that could be triggered by a social impact (CEQA Guidelines Section 15131(a)). The social inconvenience of parking deficits, such as having to hunt for scarce parking spaces, is not an environmental impact, but there may be secondary physical environmental impacts such as increased

traffic congestion at intersections, air quality impacts, safety impacts, or noise impacts caused by congestion. In the experience of San Francisco transportation planners, however, the absence of a ready supply of parking spaces, combined with available alternatives to auto travel (e.g., transit service, taxis, bicycles or travel by foot) and a relatively dense pattern of urban development, induces many drivers to seek and find alternative parking facilities, shift to other modes of travel, or change their overall travel habits. Any such resulting shifts to transit service in particular would be in keeping with the City's "Transit First" policy. The City's Transit First Policy established in the City's Charter Section 16.102 provides that "parking policies for areas well served by public transit shall be designed to encourage travel by public transportation and alternative transportation."

The transportation analysis accounts for potential secondary effects, such as cars circling and looking for a parking space in areas of limited supply, by assuming that all drivers would attempt to find parking at or near the project site and then seek parking further away if convenient parking is unavailable. Moreover, the secondary effects of drivers searching for parking is typically offset by a reduction in vehicle trips due to others who are aware of constrained parking conditions in a given area. Hence, any secondary environmental impacts which may result from a shortfall in parking in the vicinity of the proposed project would be minor, and the traffic assignments used in the transportation analysis, as well as in the associated air quality, noise, and pedestrian safety analyses, reasonably addresses potential secondary effects.

Pedestrians

The proposed project would have a significant effect on the environment if it would result in substantial overcrowding on public sidewalks, create potentially hazardous conditions for pedestrians, or otherwise interfere with pedestrian accessibility to the site and adjoining areas.

Bicycles

The proposed project would have a significant effect on the environment if it would create potentially hazardous conditions for bicyclists or otherwise substantially interfere with bicycle accessibility to the site and adjoining areas.

Loading

The proposed project would have a significant effect on the environment if it would result in a loading demand during the peak hour of loading activities that could not be accommodated within proposed on-site loading facilities or within convenient on-street loading zones, and created potentially hazardous conditions or significant delays affecting traffic, transit, bicycles, or pedestrians.

Construction

Construction-related impacts generally would not be considered significant due to their temporary and limited duration.

ANALYSIS METHODOLOGY

Project Travel Demand

To estimate the number of new person-trips that would be generated by the proposed project, trip generation rates were applied to the proposed residential and retail space and calculated on a weekday daily and p.m. peak-hour basis. These person-trips were distributed to eight geographical areas, including the four quadrants of San Francisco, the East Bay, the North Bay, the South Bay, and outside the area, and were assigned to the various available travel modes (including auto, transit, walk, and other modes). Both the distribution and the choice of travel mode (mode split) of the trips were based upon the type of land use and the purpose of the trip, plus the geographic distribution of residents and employment in the Bay Area and the availability of the various travel modes. The number of vehicle trips generated by the proposed project was determined from the auto person-trips and average vehicle occupancy.

The travel demand, parking demand and freight/service loading demand estimates were based on rates compiled by the Planning Department and published in the *Transportation Impact Analysis Guidelines for Environmental Review*, October 2002 (“*SF Guidelines*”), plus the 1990 and 2000 U.S. Census journey-to-work data.

The proposed project would generate approximately 1,390 person-trips on a weekday daily basis and 178 person-trips during the p.m. peak hour. Of the 178 p.m. peak hour person-trips, 66 trips would be by auto, 34 trips would be by transit, and 78 trips would be by walking and other modes. About

50 new vehicle trips would be generated by the proposed project during the weekday p.m. peak hour, of which about 62 percent would be inbound to the project site and 38 percent would be outbound from the project site.

Overall, approximately 83 percent of the person-trips would travel within San Francisco, with 9 percent to and from the East Bay, 6 percent to and from the South Bay, 1 percent to and from the North Bay, and 1 percent to and from outside the region. During the p.m. peak hour, about 37 percent of the person-trips would be via auto, 19 percent via transit, and 44 percent via walking and other modes.

The proposed residential and retail project would generate a demand for about 105 spaces, of which 91 spaces would be long-term residential demand, four spaces would be long-term retail demand, and ten spaces would be short-term retail demand. Peak residential parking demand would occur overnight, although a portion would also occur during the day.

Delivery/service-vehicle trip generation and demand for loading spaces for the proposed project were estimated based on the methodology and assumptions provided in the *SF Guidelines*. In total, the proposed project would generate about four daily delivery/service-vehicle trips. The proposed project would have a demand for less than one loading space during the peak and average hours of loading activities.

EXISTING-PLUS-PROJECT CONDITIONS

Traffic Impacts

The proposed project would generate about 31 inbound and 19 outbound vehicle trips during the weekday p.m. peak hour. These 50 trips were distributed to the local and regional roadway network based on the origin/destination of each trip (from the trip distribution calculations), the street directions, and the configuration of the proposed parking garage driveway. As shown on Table 2, page 67, the addition of project-generated traffic would result in a relatively small change in the average delay per vehicle at the study intersections, and all four study intersections would continue to operate at the same acceptable service levels as under Existing conditions (LOS C or better), and therefore, the proposed project would not cause significant traffic impacts.

Transit Impacts

The proposed project would generate about 20 inbound and 14 outbound transit trips during the weekday p.m. peak hour. These 34 transit trips to and from the project site would use the nearby Muni lines and regional transit lines, and may include transfers to other Muni bus and light rail lines, or other regional transit providers. In the immediate vicinity of the project site, the transit lines generally have available capacity during the weekday p.m. peak hour that could be used to accommodate the inbound and outbound transit trips generated by the proposed project, and the proposed project would not substantially affect, or have a significant impact on, transit operations.

Parking Impacts

The proposed project would supply a total of 74 parking spaces for the residential units in a parking garage on the first two levels of the redeveloped structure, with access from Colin P. Kelley Jr. Street. The 74 parking spaces would meet the maximum allowed under the *Design for Development*. (Provision of parking is not required for retail space that does not exceed 5,000 square feet.) The Agency uses the *Planning Code* as a guide in applying the development controls of the *Design for Development*. The *Planning Code*, if applied to the proposed project would require three of the 74 parking spaces to be handicapped accessible. Accordingly, three of the 74 parking spaces on the first level would be handicapped accessible.

The proposed project would generate a long-term residential parking demand for about 91 spaces. The long-term residential demand generally occurs during the evening and overnight hours. The long-term parking demand of 91 spaces would not be accommodated within the parking supply of 74 parking spaces, which would result in a shortfall of 17 spaces. This shortfall could be accommodated on-street, where parking is allowed overnight, or in nearby off-street parking facilities that provide overnight parking.

During the weekday midday, the residential parking demand is estimated to be about 80 percent of the overnight parking demand, or about 73 spaces. In addition, there would be a parking demand for the retail uses of 14 spaces. It is anticipated that a portion of the 13-space overnight parking shortfall would remain parked on-street or in off-street facilities during the day. Since the proposed project would provide 74 parking spaces, there would be a shortfall of between 13 parking spaces (87-space midday demand less the 74-space parking supply) and 31 parking spaces (105-space total demand

less the 74-space parking supply) during the midday period. Since the proposed project would have a shortfall of between 13 and 31 parking spaces, on-street and off-street parking occupancy in the study area would increase. The short term parking demand could be accommodated within the on-street supply, which is generally restricted to one-hour and two-hour parking limits. Therefore, the proposed project would not result in significant parking impacts resulting from the parking shortfall.

Pedestrian Impacts

Pedestrian trips generated by the proposed project would include walking trips to and from the residential and retail uses, plus walking trips to and from the local and regional transit operators, and some walking trips to and from nearby parking facilities. Overall, the proposed project would add about 112 pedestrian trips (34 to/from transit and 78 walk/other) to the surrounding streets during the weekday p.m. peak hour. These pedestrians would enter and exit the proposed project via the residential lobby on Colin P. Kelly Jr. Street. It is anticipated that a majority of the new pedestrian trips during the weekday p.m. peak hour would be to and from the commercial uses on Townsend Street west of the project site, and to and from the Second/King N-Judah train stop and the Caltrain terminal at Fourth/Townsend. These new pedestrian trips could be accommodated on the existing sidewalks and crosswalks adjacent to the project site and would not substantially affect the current pedestrian conditions along Colin P. Kelly Jr. Street or Townsend Street. As these sidewalks are eight to eleven feet wide and currently have low pedestrian activity, pedestrian conditions would continue to remain acceptable, and the proposed project would not result in significant environmental impacts.

Bicycle Impacts

No bicycle parking is required under the *Design for Development*; however, the inclusion of bicycle parking is strongly encouraged by the Agency. Accordingly, the proposed project would supply six bicycle parking spaces.

The project site is within convenient bicycling distance of Downtown San Francisco, the Financial District, and major transit hubs (the Ferry Building, the Transbay Terminal, and the Caltrain station). As such, it is anticipated that a portion of the “other” trips generated by the proposed project would be bicycle trips, which would utilize the bicycle routes along Second Street, Townsend Street, and The Embarcadero. Although the proposed project would result in an increase in the number of

vehicles in the vicinity of the project site (during the p.m. peak hour there would be 31 vehicle trips inbound to the site and 19 trips outbound from the site), this increase would not be substantial enough to affect bicycle travel in the area, and would not result in significant environmental impacts.

Loading Impacts

While the proposed project would provide an off-street loading bay, with access from Colin P. Kelly Jr. Street, the *Design for Development* would not require the proposed project to provide loading spaces for either the residential or retail uses.

The proposed project would generate a demand for less than one loading space during both the average and the peak hour of loading activities. As such, the proposed loading bay would accommodate the anticipated demand, and would therefore not result in significant environmental impacts. Access to the loading bay would be on Colin P. Kelly Jr. Street. The loading bay would have access to the building elevators. It is anticipated that all deliveries to the residential uses would use the loading bay. Residential move-in and move-out activities would also occur via the loading bay. In addition, if required, curb space for moving vans on Colin P. Kelly Jr. Street could be reserved through the local Police Department station.

A trash room would be located on the ground level, and would be the primary garbage/recycling area for the proposed project. For garbage/recycling pickup, trash containers would be transported by the trash/recycling service from the trash room to the curb via the loading dock, and would be returned following pick-up. For garbage/recycling pick-up, trucks would be directed to stop at the curb adjacent to the loading bay. Garbage collection would not occur outside of the loading area. Since garbage/recycling pick-up would occur in the very early morning hours, garbage/recycling pickup would not interfere with any loading activities.

Construction Impacts

It is anticipated that construction of the proposed project would take approximately 14 months. Construction-related activities would typically occur Monday through Saturday from 7:00 a.m. to 3:30 p.m. It is not anticipated that construction activities would occur on weekends, but may occur on an as-needed basis for a particular phase.

Construction staging would occur primarily within the site, and possibly from the adjacent sidewalk on Colin P. Kelly Jr. Street. The sidewalk along the project site frontage on Colin P. Kelly Jr. and Townsend Streets may be closed throughout the construction period and a temporary pedestrian walkway and overhead protection would be constructed. It is anticipated that no regular traffic lanes would need to be closed during construction. However, if it is determined that temporary traffic lane closures would be needed, the closure would be coordinated with the City in order to minimize the impacts on local traffic, including review and approval, as appropriate, by the Department of Public Works and the Interdepartmental Staff Committee on Traffic and Transportation.

Since there are no Muni bus stops along the project site frontage, it is not anticipated that any Muni bus stops would need to be relocated during construction of the proposed project.

During the construction period, there would be a flow of construction-related trucks into and out of the site. There would be between six and 30 construction truck trips per day. It is anticipated that the majority of the construction-related truck traffic would use I-80/U.S. 101 and I-280 to access the project site from the East Bay and South Bay. The impact of construction truck traffic would be a temporary reduction of street capacities due to the slower movement and larger turning radii of trucks, which may affect both traffic and Muni operations.

On average, there would be between 15 and 85 construction workers per day at the project site, depending on the phase. It is anticipated that the addition of the worker-related vehicle or transit trips would not substantially affect transportation conditions, because any impacts on the vehicle and transit network would be similar to or less than those associated with the proposed project. In addition, the construction workers would cause a temporary increase in parking demand, which is anticipated to be accommodated within the 270 Brannan Street parking lot (located on the north side of Brannan, midblock between Second Street and Delancey Street and opposite from the northern terminus of Colin P. Kelly Jr. Street).

2025 CUMULATIVE CONDITIONS

Methodology

Future year 2025 Cumulative traffic and transit conditions were based on the projections developed for the South of Market area for the *300 Spear Street/201 Folsom Street Transportation Study*

(Wilbur Smith Associates, January 31, 2002). The San Francisco County Transportation Authority countywide travel demand forecasting model was used to develop the traffic and transit forecasts for cumulative development and growth through the year 2025 in the region, as well as to determine travel demand to and from the South of Market area. This approach resulted in a cumulative impacts assessment for year 2025 conditions that takes into account the future development expected in the South of Market area, as well as the expected growth in housing and employment for the remainder of San Francisco and the nine Bay Area counties.

2025 Cumulative Traffic Impacts

Table 3, below, presents the 2025 Cumulative weekday p.m. peak hour intersection operating conditions at the study intersections that would result from the increased traffic volumes under 2025 Cumulative conditions. Overall, two of the four study intersections would operate at LOS E under 2025 Cumulative conditions (as compared to all intersections operating at acceptable LOS C or better under Existing conditions). In general, the poor operating conditions would occur along the access routes to the I-280 King Street on-ramps.

Table 3				
Intersection Levels of Service				
Existing and 2025 Cumulative Conditions – Weekday PM Peak Hour				
	Existing		2025 Cumulative	
	Delay¹	LOS	Delay¹	LOS²
1. Townsend/The Embarcadero	29.0	C	62.7	E
2. Townsend/Colin P. Kelly Jr. ³	10.8 (SB)	B	12.3 (SB)	B
3. Townsend/Second	13.8	B	15.0	B
4. King/Second	22.3	C	60.3	E

Source: LCW Consulting, April 2006.

Notes:

¹ Delay presented in seconds per vehicle.

² Intersections operating at LOS E or F are highlighted in bold.

³ Intersection STOP-controlled. Delay and LOS presented for worst approach. Worst approach indicated in parentheses ().

The proposed project's contribution to the two study intersections that would operate at LOS E during the weekday p.m. peak hour would be 3.1 percent of the traffic growth at the intersection of Townsend/The Embarcadero, and 1.0 percent of the traffic growth at the intersection of King/Second. At the intersection of Townsend/The Embarcadero, the proposed project would add traffic to movements that would continue to operate satisfactorily. At the intersection of King/Second, the proposed project would add to some critical intersection movements that would operate poorly under 2025 Cumulative conditions. In particular, the proposed project would add four vehicle-trips to the eastbound left turn movement and three vehicle-trips to the southbound right turn movement. However, the contributions to these movements would be very small, and therefore the proposed project would not be considered to contribute significantly to 2025 Cumulative impacts.

D. GROWTH INDUCEMENT

A project would be considered growth inducing if its construction and operation would encourage population increases and/or new development that might not occur if the project were not approved and built. The proposed project entails redevelopment of the existing single-story warehouse building on the site into a nine-story building providing 74 dwelling units, 74 parking spaces, and 5,000 square feet of neighborhood-serving retail space. The additional residential and retail space in the South Beach neighborhood would add a daily population of approximately 123 people to the currently vacant project site, including 109 new residents and 14 new employees. The increase of approximately 14 onsite jobs to the vicinity would not be considered significant in the large and dynamic economy of the Bay Area. The demand for housing by project workers would be substantially less than the number of residential units created by the proposed project; thus, the project would not create a demand for housing. Because of the current strong demand for housing that would exist with or without the proposed project, especially for housing close to the Financial District, the proposed project would not induce substantial growth or concentration of population beyond that which would have occurred without the project. Some project residents may relocate from other parts of the Bay Area to be closer to their employment in Downtown San Francisco. To the extent that this occurs, the proposed project would result in reduced commuting distances to work. For these reasons, the proposed project would not cause significant growth-inducing impacts.

E. AREAS OF CONTROVERSY AND ISSUES TO BE RESOLVED

This EIR focuses on the issues of historical resources, transportation, and growth inducement, as well as discussing land use for informational purposes. The Initial Study found that physical environmental effects related to visual quality and urban design, light and glare, agricultural resources, air quality/climate, wind, shadow, biology, archeological resources, geology/topography, hazards, hydrology and water quality, land use, noise, population and housing, utilities/public services, and recreation would not be considered significant or would be reduced to less than significant levels by recommended mitigation measures, and required no further discussion.

Residents of the South Beach neighborhood and business owners and employees in the surrounding urbanized area have expressed concerns in the following areas: views, glare and reflection, project design, daylight in courtyards of adjacent buildings, historic resources, construction and operational noise, construction and operational traffic, transportation improvements at local streets and intersections, parking, and access to the parking garage.

Views, glare and reflection, project design, daylight in adjacent buildings, historic resources, and construction and operational noise are addressed in the Initial Study. Historic resources are also addressed in this EIR, in III. Environmental Setting and Impacts, A. Historical Resources. Construction and operational traffic, transportation improvements at local streets and intersections, parking, and access to the parking garage are addressed in this EIR, in III. Environmental Setting and Impacts, C. Transportation.

Residents of this neighborhood may be concerned about the potential impacts of a change in use on a site that is currently occupied by a vacant commercial building. In addition, business owners and employees in the surrounding urbanized area may have concerns about any new project. The Agency Commission will be asked to certify the Final EIR after publication and distribution of written responses to all comments received on the Draft EIR. After Final EIR certification, and following consideration of community concerns and the information presented in the Initial Study and this EIR, including any non-environmental issues that were raised during the EIR process, the Agency Commission will decide whether or not to approve the proposed project.

IV. MITIGATION MEASURES PROPOSED TO MINIMIZE THE POTENTIAL ADVERSE IMPACTS OF THE PROJECT

In the course of project planning and design, measures have been identified that would reduce or preclude potentially significant environmental impacts of the proposed project. Mitigation measures identified in this EIR and in the Initial Study would be required by the Agency as conditions of project approval unless they are demonstrated to be infeasible based on substantial evidence in the record. Implementation of some measures may be the responsibility of other public agencies.

Each mitigation measure is discussed below. Measures from the Initial Study (see Appendix A) proposed as part of the project are indicated with an asterisk (*).

*** AQ-1. Construction Air Quality**

The project applicant shall require the construction contractor to reduce the severity of project construction period dust impacts by complying with the following control measures:

- Water all active construction areas at least twice daily. Consistent with Ordinance 175-91, only non-potable water shall be used for all dust-control purposes. The construction contractor shall obtain reclaimed water from the City's Clean Water Program for this purpose.
- Cover all trucks hauling soil, sand, and other loose materials, or require all trucks to maintain at least 2 feet of freeboard.
- Pave, apply water two times daily, or apply non-toxic soil stabilizers on all unpaved access roads, parking areas, and staging areas at the construction site.
- Sweep daily (with water sweepers) all paved access roads, parking areas, and staging areas at the construction site.
- Sweep adjacent public streets daily (with water sweepers) if any visible soil material is carried onto the streets.
- All construction contracts shall require construction contractors to (1) properly maintain construction equipment and vehicles in accordance with the manufacturers'

recommendations, and (2) minimize idling time when equipment is not in use and when trucks are waiting in queues.

* **CR-1. Historic Resources (Stucco Finish)**

Remove the non-historic stucco finish. Prior to 1999, Hooper's South End Grain Warehouse was stuccoed, and experts disagreed about whether or not it was originally exposed brick or stucco. Further testing should be conducted, but the existing stucco is clearly non-historic and damaging to the building's character. If it is possible to remove it without damaging the brick below, removing it to expose the brick, or removing it and applying a stucco finish that more closely approximates an historic finish would offer one means of mitigating the effect posed by the residential addition.

* **CR-2. Historic Resources (Fenestration on Townsend Street Façade)**

Decrease the level of fenestration on the Townsend Street façade. Through incremental change and the 1999 project, the Townsend Street façade has been drastically opened, losing the sense of enclosure that is characteristic of this warehouse type. By decreasing the size of openings and rebuilding some of the former wall, the proposed project could partially mitigate the impact of the construction of the new residential structure.

* **CR-3. Historic Resources (Chamfered Corner)**

Remove the non-historic chamfered corner and replace it with a storefront aligned with the streets.

* **CR-4. Historic Resources (Documentation)**

Document the history and the existing exterior and interior conditions of Hooper's South End Grain Warehouse according to the *Historic American Buildings Survey* ("HABS") Level II documentation in addition to the other mitigation measures identified, and (2) install on-site displays communicating the historic significance of the building and the historical location of the shoreline.

(1) According to HABS standards, Level II documentation consists of the following tasks:

- *Drawings:* Existing drawings, where available, should be photographed with large format negatives or photographically reproduced on mylar.
- *Photographs:* Photographs with large-format negatives should be shot of exterior and interior views or historic views where available. These should be printed on archival fiber paper.
- *Written data:* A report documenting the existing conditions and history of the building should be prepared.

The completed documentation package would be submitted to local and regional archives, including but not limited to, the San Francisco Public Library History Room, the California Historical Society and the Northwest Information Center at Sonoma State University in Rohnert Park.

- (2) Install a plaque at the front of the building to communicate its historic significance. In addition, the sidewalk around Hooper's South End Grain Warehouse makes indications about the historic location of the shoreline, which once passed underneath the corner of the building. The existing pavement does not continue those lines to the edge of the building. When relaying concrete around the building, continue the historic lines up to the edge of the building.

* **CR-5. Historic Resources (Subsurface Cultural Resources)**

The following mitigation measure is required to avoid any potential adverse effect from the proposed project on accidentally discovered buried or submerged historical resources as defined in *CEQA Guidelines* Section 15064.5(a)(c), including human or associated funerary remains. The project sponsor shall retain the services of an archaeologist. During any soils disturbing activities within the project site, the archaeologist shall carry out a pre-excavation testing program to better determine the probability of finding archaeological remains on the site. The testing program shall consist of a series of mechanical exploratory borings or trenches and/or other testing methods determined to be appropriate by the archaeologist.

If, after testing, the archaeologist determines that no further investigations or precautions are necessary to safeguard potentially significant archaeological resources, the archaeologist shall submit a written report to the City's Environmental Review Officer ("ERO"), with copies to the project sponsor and the Agency. If the archaeologist determines that further investigations or precautions are necessary, he/she shall consult with the ERO, and they shall jointly determine what additional procedures are necessary to minimize potential effects on archaeological resources.

These additional mitigation measures shall be implemented by the project sponsor and might include a program on on-site monitoring of any site excavation and foundation work that may be necessary, during which the archaeologist shall record observations in a permanent log. Whether or not there are archaeological finds of significance, the archaeologist shall prepare a written report on the monitoring program that shall be submitted first and directly to the ERO with copies to the project sponsor and Agency. During the monitoring program, the project sponsor shall designate one individual on site as his/her representative. This representative shall have the authority to suspend work at the site to give the archaeologist time to investigate and evaluate archaeological resources that may be encountered.

Should evidence of cultural resources of potential significance be found during the monitoring program, the archaeologist shall immediately notify the ERO, and the project sponsor shall halt any activities which the archaeologist and the ERO jointly determine could damage such cultural resources. Ground disturbing activities which might damage cultural resources would be suspended for a total maximum of four weeks over the course of construction.

After notifying the ERO, the archaeologist shall prepare a written report to be submitted first and directly to the EIR, with copies to the project sponsor and Agency, which shall contain an assessment of the potential significance of the archaeological finds and recommendations for what measures should be implemented to minimize potential effects on archaeological resources. Based on this report, the ERO shall recommend specific additional mitigation measures to be

implemented by the project sponsor. These additional mitigation measures might include a site security program, additional on-site investigations by the archaeologist, and/or documentation, preservation and recovery of archival material.

Finally, the archaeologist shall prepare a report documenting the archaeological resources that were discovered, and evaluation as to their significance, and a description as to how any archaeological testing, exploration and/or recovery program was conducted.

Copies of all draft reports prepared according to this mitigation measure shall be sent first and directly to the ERO for review. Following approval by the ERO, copies of the final report shall be sent to the President of the Landmarks Preservation Advisory Board and the Northwest Information Center. Three copies of the final report shall be submitted to the Office of Major Environmental Analysis, accompanied by copies of the transmittals documenting distribution to the President of the Landmarks Preservation Advisory Board and the Northwest Information Center.

* **CR-6. Historic Resources (Paleontological Resources)**

If any paleontological resources are encountered during site grading or other construction activities, all ground disturbance shall be halted until the services of a qualified paleontologist can be retained to identify and evaluate the resource(s) and, if necessary, recommend mitigation measures to document and prevent any significant adverse effects on the resource(s).

* **HM-1. Hazards (Contaminated Soil)**

All contaminated soils designated as hazardous waste shall be excavated by a qualified Removal Contractor and disposed of at a regulated Class I hazardous waste landfill in accordance with U.S. Environmental Protection Agency regulations, as stipulated in the Site Mitigation Plan. The Removal Contractor shall obtain, complete, and sign hazardous waste manifests to accompany the soils to the disposal site. Other excavated soils shall be disposed of in an appropriate landfill, as governed by applicable laws and regulations, or other appropriate actions shall be taken in coordination with the San Francisco Department of Public Health (“DPH”).

A Site Health and Safety (“H&S”) Plan would be required by the California Division of Occupational Safety and Health prior to initiating any earth-moving activities at the site. The H&S Plan shall identify protocols for managing soils during construction to minimize worker and public exposure to contaminated soils. The protocols shall include at a minimum:

- Sweeping of adjacent public streets daily (with water sweepers) if any visible soil material is carried onto the streets.
- Characterization of excavated native soils proposed for use on site prior to placement to confirm that the soil meets appropriate standards.
- The dust controls specified in Air Quality Mitigation Measure AQ-1.
- Protocols for managing stockpiled and excavated soils.

The H&S Plan shall identify site access controls to be implemented from the time of surface disruption through the completion of earthwork construction. The protocols shall include as a minimum:

- Appropriate site security to prevent unauthorized pedestrian/vehicular entry, such as fencing or other barrier of sufficient height and structural integrity to prevent entry and based upon the degree of control required.
- Posting of “no trespassing” signs.
- Providing on-site meetings with construction workers to inform them about security measures and reporting/contingency procedures.

If groundwater contamination is identified, the H&S Plan shall identify protocols for managing groundwater during construction to minimize worker and public exposure to contaminated groundwater. The protocols shall include procedures to prevent unacceptable migration of contamination from defined plumes during dewatering.

The H&S Plan shall include a requirement that construction personnel be trained to recognize potential hazards associated with underground features that could contain hazardous substances, previously unidentified contamination, or buried hazardous debris. Excavation personnel shall also be required to wash hands and face before eating, smoking, and drinking.

The H&S Plan shall include procedures for implementing a contingency plan, including appropriate notification and control procedures, in the event unanticipated subsurface hazards are discovered during construction. Control procedures could include, but would not be limited to, investigation and removal of underground storage tanks or other hazards.

* **HM-2. Hazards (Decontamination of Equipment)**

All trucks and excavation and soil handling equipment shall be decontaminated following use and prior to removal from the site. Gross contamination shall be first removed through brushing, wiping, or dry brooming. The vehicle or equipment shall then be washed clean (including tires). Prior to removal from the work site, all vehicles and equipment shall be inspected to ensure that contamination has been removed.

* **HM-3. Hazards (Procedures for Handling Contaminated Soils)**

The following procedures shall be observed when handling, hauling, and disposing of contaminated soils:

- (a) Specific work practices: The construction contractor shall be alert for the presence of hazardous soils during excavation and other construction activities on the site (detected through soil odor, color, and texture and results of on-site soil testing), and shall be prepared to handle, profile (i.e., characterize), and dispose of such soils appropriately (i.e., as dictated by local, State, and federal regulations) when such soils are encountered on the site. If there are excavated materials containing over one percent friable asbestos, they would be treated as hazardous waste, and would be transported

and disposed of in accordance with applicable State and federal regulations. These procedures are intended to mitigate any potential health risks related to chrysotile asbestos, which may or may not be located on the site.

- (b) Dust suppression: Soils exposed during excavation for site preparation and project construction activities shall be kept moist throughout the time they are exposed, both during and after work hours.
- (c) Air monitoring: Air monitoring of ambient air and, as necessary, for worker exposure, shall be performed to ensure compliance with all federal, State, and local regulations and exposure requirements.
- (c) Surface water runoff control: Where soils are stockpiled, visqueen shall be used to create an impermeable liner, both beneath and on top of the soils, with a berm to contain any potential surface water runoff from the soil stockpiles during inclement weather.
- (d) Soils replacement: If necessary, clean fill or other suitable material(s) shall be used to bring portions of the project site, where contaminated soils have been excavated and removed, up to construction grade.
- (e) Hauling and disposal: Contaminated soils shall be hauled off the project site by waste hauling trucks appropriately certified with the State of California and adequately covered to prevent dispersion of the soils during transit, and shall be disposed of at a permitted hazardous waste disposal facility registered with the State of California.

* **HM-4. Hazards (Closure/Certification Report for Contaminated Soils)**

After excavation and foundation construction activities are completed, the project sponsor shall prepare and submit a Closure/Certification Report to DPH for review and approval. The Closure/Certification Report shall include the mitigation measures in the Site Mitigation Plan (*Site Mitigation Plan, 72 Townsend Street, San Francisco, CA, SCA Project No. X4256.AS, SCA Environmental, Inc., August 2000*) for handling and removing contaminated soils from the project site, whether the construction contractor modified any of these mitigation measures, and how and why the construction contractor modified those mitigation measures.

* **HM-5. Hazards (Procedures for Exterior Excavation Work)**

If excavation work at the exterior of the project building is planned, such as for utility trenches, additional sampling of soils at these exterior locations shall be performed, as directed by DPH.

V. SIGNIFICANT ENVIRONMENTAL EFFECTS THAT CANNOT BE AVOIDED IF THE PROJECT IS IMPLEMENTED

In accordance with Section 21100(b)(2)(A) of CEQA, and with Section 15126.2 of the CEQA Guidelines, this chapter identifies environmental impacts that could not be eliminated or reduced to less than significant levels by mitigation measures included as part of the proposed project, or by other mitigation measures that could be implemented, as described in Chapter IV, Mitigation Measures, pages 83 through 88. This chapter is subject to final determination by the Agency Commission as part of its certification of the EIR. The Final EIR will be revised, if necessary, to reflect the findings of the Agency.

The proposed project, with mitigation, would have the following unavoidable significant impacts on historic architectural cultural resources:

- The project sponsor intends to redevelop the Hooper's South End Grain Warehouse building at 64-72 Townsend Street by adding a seven-story residential structure on top of the existing warehouse. The Hooper's Warehouse building at 64-72 Townsend Street is considered a historical resource for CEQA purposes, and the proposed redevelopment of this building would be a significant adverse impact.
- The proposed project would result in a considerable contribution to a significant cumulative impact on historic architectural resources in the project vicinity.

With implementation of the mitigation measures outlined in Chapter IV, Mitigation Measures, of this report, all other potential significant impacts would be reduced to less than significant levels.

V. SIGNIFICANT EFFECTS THAT CANNOT BE AVOIDED

VI. ALTERNATIVES TO THE PROPOSED PROJECT

This chapter identifies alternatives to the proposed project and discusses environmental impacts associated with each alternative. The Agency Commission could adopt any of the following alternatives instead of the proposed project, if an alternative would reduce or eliminate significant environmental impacts of the project, is determined to be feasible, and would attain most of the basic objectives of the project. This determination of feasibility will be made by the Agency Commission on the basis of substantial evidence in the record which shall include, but not be limited to, information presented in this Draft EIR and comments received on the Draft EIR.

Alternatives were selected that would reduce identified impacts of the proposed project. The following alternatives are evaluated: a No-Project Alternative, a Preservation Alternative in which the existing historic building on the project site would be preserved, and a Reduced Alternative that would be approximately half the size and height of the proposed project. Other alternatives, with a variety of configurations, could also be considered by the Agency, provided the proposed uses are similar to those analyzed in the proposed project or the alternatives. Other uses for the project site are not considered, since the project sponsor only intends to redevelop the existing building into a 74-unit residential building with 5,000 square feet of retail space, and other uses would not meet the basic objectives of the project.

Whether property is owned or can reasonably be acquired by the project sponsor has a strong bearing on the feasibility of developing a project alternative at a different site. No viable alternative sites have been identified within San Francisco where the proposed project could be constructed that would meet most of the project sponsor's objectives and where the proposed project's environmental impacts would be substantially reduced or avoided.

A. ALTERNATIVE A: NO PROJECT

CEQA and the State CEQA Guidelines require a No Project Alternative be included in EIRs. The purpose of the No Project Alternative is to allow decision-makers to compare the effects of the proposed project with the effects of not approving the proposed project.

Description

This alternative would not change to the existing one-story, approximately 28,175 gross square feet warehouse building on the site, which is currently vacant but contains retail/restaurant space and a parking garage. The proposed project would not be built. The currently vacant retail/restaurant space and parking garage on the site may be occupied by those types of uses in the future. This alternative, however, would not preclude future proposals for redevelopment of the project site for uses permitted in the Commercial/Alternate Use: Residential designation in the *Redevelopment Plan*, and the 40- to 105-foot height district in the *Design for Development*.

Impacts

If the No Project Alternative were implemented, none of the impacts associated with the proposed project would occur. The existing Hooper's Warehouse building (64-72 Townsend Street) on the site—a building located within the South End Historic District, listed in the California Register, identified by the OHP as having been found eligible for listing in the National Register, listed in Heritage's *Splendid Extended*, and recognized as a Contributory Building to the South End Historic District—with its existing retail/restaurant space and parking garage, would remain unaltered. The air quality impacts of the proposed project, and project-specific effects on intersection conditions, transit use, parking, loading, and pedestrian and bicycle traffic, would not occur, although these impacts would not be significant under the proposed project. If the existing building is occupied by retail and/or restaurant uses in the future, additional air emissions and person-trips would be generated, but the impacts would be less than those of the proposed project. Intersection operations (at Townsend/The Embarcadero and King/Second) and transit operating conditions would degrade to unacceptable levels of service by the 2025 cumulative horizon year with or without the this alternative. Under this alternative, if the existing building remains vacant, there would be no incremental contribution from the project site to these degraded conditions. If the existing building is occupied by retail and/or restaurant uses in the future, the incremental contribution from the project site to these degraded conditions would be less than that of the proposed project.

Other less than significant effects of the proposed project described in the Initial Study (Appendix A), including effects of the proposed project on visual quality and urban design, light and glare, agricultural resources, wind effects, shadow effects on nearby streets and buildings, biology, potential discovery of subsurface cultural resources during excavation, geology/topography, hazardous materials, hydrology and water quality, land use, noise, population and housing, recreation, and utilities/public services would not occur with this alternative and no mitigation measures would be required. If the existing building is occupied by retail and/or restaurant uses in the future, additional impacts on hydrology and water quality, noise, population and housing, recreation, and utilities/public services could occur, but these impacts would be similar to or less than those of the proposed project and, as with the proposed project, these impacts would be less than significant.

The No Project Alternative would not meet Lambert Development LLC's project objectives of maximizing residential density on this infill site.

If this alternative were selected by the Agency and a different proposal is submitted at a later date for development of all or part of the project site, that proposal would be subject to a separate project-specific environmental review under the requirements of CEQA.

B. ALTERNATIVE B: PRESERVATION ALTERNATIVE

Description

Alternative B, the Preservation Alternative, would retain the existing Hooper's Warehouse building, with its retail/restaurant space and parking garage, on the site. The building's envelope would not be altered, but the changes of the 1999 adaptive reuse project would be partially reversed by removing the non-historic stucco finish, decreasing the level of fenestration on the Townsend Street façade, replacing the non-historic chamfered corner with a storefront aligned with the streets, and documenting the history of the building, as described in Mitigation Measures CR-1 through CR-4 (pages 84 and 85). The building would be used for retail/commercial purposes.

Impacts

Unlike the proposed project, Alternative B: Preservation Alternative would preserve the existing Hooper's Warehouse building on the site. This alternative would avoid the removal of the existing roof, including the original heavy timber posts and trusses, and alteration of the overall form of the building that would occur under the proposed project. This was considered a significant impact on historic resources of the proposed project.

Impacts of this alternative on visual quality, urban design, views, and land use would be less than those of the proposed project and would be less than significant.

Alternative B would generate fewer vehicle trips than the proposed project, and have reduced environmental effects on transportation and parking, although these impacts would be less than significant for the proposed project. This alternative would contribute smaller amounts than the proposed project to the cumulative year 2025 growth in traffic at two nearby intersections that would operate at LOS E under cumulative conditions (Townsend/The Embarcadero and King/Second), but neither this alternative nor the proposed project would have a significant cumulative impact, because both would add traffic to movements that would continue to operate satisfactorily, or would make very small contributions to critical intersection movements that would operate poorly under 2025 Cumulative conditions.

This alternative's effects on wind and shadow would be less than those of the proposed project. The wind and shadow impacts, including cumulative impacts, would be less than significant.

Compared to the proposed project, the Preservation Alternative would have smaller effects on air quality, archeological cultural resources, hazards, noise, utilities and public services, biology, geology/topography, water, and energy/natural resources, and these impacts would be less than significant.

Alternative B: Preservation Alternative would not meet Lambert Development LLC's project objectives of maximizing residential density on this infill site.

C. ALTERNATIVE C: REDUCED ALTERNATIVE

Description

Alternative C, the Reduced Alternative, would alter the existing Hooper's Warehouse building by constructing additional residential levels. Under this alternative, three or four levels, with approximately 37 residential units, would be added. Approximately 37 above-grade parking spaces on the first two levels would be provided. This alternative would include 5,000 square feet of ground-floor neighborhood-serving retail space.

Impacts

Alternative C: Reduced Alternative would remove the existing roof, including the original heavy timber posts and trusses, and alter the overall form of the existing Hooper's Warehouse building on the site. Similar to the proposed project, the alterations under this alternative would be considered a significant impact on historic resources.

Under this alternative, the overall appearance of the project site would be substantially altered due to the addition of three or four additional floors. The height, massing, and scale of this alternative would be less than the proposed project, and impacts on visual quality, urban design, and views would be less than those of the proposed project and would be less than significant.

This alternative would add to the intensity of land use within the South Beach area, but the approximately 37 residential units would not be considered a significant addition to the projected residential housing stock in the City in the context of year 2025 housing projections. Land use impacts, including cumulative impacts, of this alternative would be less than those of the proposed project and would be less than significant.

Alternative C would have smaller environmental effects on transportation and parking. This alternative would generate about 1,070 new daily person-trips and 123 weekday p.m. peak hour person-trips (compared to 1,390 new daily person-trips and 178 weekday p.m. peak hour person-trips for the proposed project). The impacts of this alternative on operating conditions and levels of congestion at the key intersections studied would be less than significant. This alternative would contribute smaller amounts than the proposed project to the cumulative year 2025 growth in traffic at two nearby intersections that would operate at LOS E under cumulative conditions (Townsend/The

Embarcadero and King/Second), but neither this alternative nor the proposed project would have a significant cumulative impact, because both would add traffic to movements that would continue to operate satisfactorily, or would make very small contributions to critical intersection movements that would operate poorly under 2025 Cumulative conditions.

This alternative's effects on wind and shadow, including cumulative impacts, would be less than those of the proposed project and would be less than significant.

Compared to the proposed project, the Reduced Alternative would have similar or smaller effects on air quality, archeological cultural resources, hazards, noise, utilities and public services, biology, geology/topography, water, and energy/natural resources, and these impacts would be less than significant.

Alternative C: Reduced Alternative would not meet Lambert Development LLC's project objectives of maximizing residential density on this infill site.

D. ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Although Alternative B would not achieve the goals of the proposed project, it would be considered to be the environmentally superior alternative, because it avoids the significant impacts of the proposed project on historic architectural cultural resources. While Alternative B would have less development than the proposed project, it would have retail/commercial development comparable to the No Project Alternative. Alternative B would not only preserve the existing Hooper's South End Grain Warehouse building on the site, but would also reverse many of the alterations to the building from the 1999 adaptive reuse project.

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IX. APPENDICES

Appendix A: Notice of Preparation/Initial Study

Appendix B: Transportation Definitions

Appendix A

Notice of Preparation/Initial Study



NOTICE OF PREPARATION



SAN FRANCISCO REDEVELOPMENT AGENCY

DATE: January 13, 2006

The Redevelopment Agency of the City and County of San Francisco (“San Francisco Redevelopment Agency” or “Agency”) is the Lead Agency preparing an Environmental Impact Report (“EIR”) for the 72 Townsend Street project identified below. The Agency requests your comments on the scope and content of the EIR. The Agency has completed an Initial Study evaluation of the proposed project and has identified areas of probable significant adverse environmental effects. These probable adverse environmental effects are summarized below.

The Agency is sending this notice to Responsible Agencies and other interested parties. Responsible Agencies are those public agencies, besides the Agency, that also have a role in approving or carrying out the project. Responsible Agencies will need to use the EIR that the Agency has prepared when considering approvals related to the project. When the Draft EIR is published, it will be sent to all Responsible Agencies and to others who respond to this Notice of Preparation or who otherwise indicate that they would like to receive a copy.

Please send any response you may have to this notice within 30 days from the date you receive the notice. Your response, and any questions or comments, should be directed to Stanley Muraoka, Project Manager, San Francisco Redevelopment Agency, 770 Golden Gate Avenue, San Francisco, CA 94102; telephone 415-749-2577. Please reference case number **ER12.15.05** in your response.

PROJECT TITLE: 72 Townsend Street

PROJECT ADDRESS AND LOCATION: 72 Townsend Street, at the northwest corner of the intersection of Townsend and Colin P. Kelly Jr. Street, in the City and County of San Francisco, California (Assessor’s Parcel No. 3789-003).

PROJECT SPONSOR: Lambert Development LLC, New York, NY

PROJECT DESCRIPTION: The proposed project consists of redevelopment of an existing single-story warehouse building into an eight-story building providing about 74 dwelling units and about 78 above-grade parking spaces on two levels. The rectangular-shaped project site is on the west side of the city block bounded by Townsend, Colin P. Kelly Jr., Brannan, and Second Streets in the South Beach area of San Francisco (Figure 1). The project site is located at 64/72 Townsend Street, on Assessor’s Block 3789, Lot 3, which totals 29,098 sq. ft., or approximately 0.67 acre.

NOTICE OF PREPARATION

PROBABLE ENVIRONMENTAL EFFECTS: Likely environmental effects include impacts on historic resources, increases in traffic and related circulation impacts, and cumulative transportation effects.

The proposed project would not have a significant adverse effect on the environment for the following environmental factors: scenic views, scenic resources; visual character; light and glare; agricultural resource; air quality effects on sensitive receptors; wind; shadow effects; biological resources; archaeological resources; paleontological resources; geology and soils; hazards and hazardous materials; noise; population and housing; public services; recreation; air traffic; and, utilities and service systems. These environmental factors are discussed in the Initial Study and require no further environmental analysis.

A handwritten signature in blue ink, appearing to read 'Stanley Muraoka', with a long horizontal flourish extending to the right.

Stanley Muraoka
Project Manager

FILE NO. ER12.15.05

NOTICE OF PREPARATION



Source: During Associates
81805

Proposed Project Location Figure 1

SAN FRANCISCO REDEVELOPMENT AGENCY



72 TOWNSEND STREET PROJECT INITIAL STUDY

January 13, 2006

FILE NUMBER: ER12.15.05

PREPARED BY: San Francisco Redevelopment Agency, and

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PROPOSED PROJECT:

1. Project Title:

72 Townsend Street

2. Lead Agency:

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3. Contact Person:

Stanley Muraoka
Project Manager
(415) 749-2577

4. Project Address and Location:

72 Townsend Street, at the northwest corner of the intersection of Townsend and Colin P. Kelly Jr. Street, in the City and County of San Francisco, California (Assessor's Parcel No. 3789-003).

5. Project Sponsor:

Lambert Development LLC
New York, NY

6. General Plan Designation:

Office/Neighborhood Commercial/Warehouse (Alternate Use: Housing), *Northeastern Waterfront Plan* element of the *San Francisco General Plan*.

7. Zoning:

Commercial (Alternate Use: Residential), *Rincon Point-South Beach Redevelopment Plan*.

8. Description of Project:

The proposed project consists of redevelopment of an existing single-story warehouse building into an eight-story building providing about 74 dwelling units and about 78 above-grade parking spaces on two levels. The rectangular-shaped project site is on the west side of the city block bounded by Townsend, Colin P. Kelly Jr., Brannan, and Second Streets in the South Beach area

of San Francisco (Figure 1, page 4).¹ The project site is located at 64/72 Townsend Street, on Assessor's Block 3789, Lot 3, which totals 29,098 sq. ft., or approximately 0.67 acre.

The existing historic warehouse building occupying the entire site would be retained, except for the roof, and would contain two levels of above-grade parking, as well as 5,000 sq. ft. of ground-floor neighborhood-serving retail space divided into two units of 2,500 sq. ft. each. The seven residential stories would be constructed on top of the existing building and would be stepped back from the façade of the existing building to create a podium level with an indoor swimming pool, hot tub, and open space (see Figures 2 through 6, pages 5 through 9).

The approximately 147,320-gross-square-foot (gsf) building would contain about, 37 one-bedroom units and 37 two-bedroom units. The two-bedroom-plus units would have additional space that could be configured for a computer alcove, breakfast nook, or additional walk-in closet. The residential units would range in size from 1,089 to 1,241 square feet (sq. ft.), with an average size of 1,105 sq. ft. Ten percent of the units would be sold as below-market rate units to assist the City in meeting its affordable housing requirements. Thirty-seven of the units would include 72-square-foot balconies, and four units would have 67 square-foot-terraces.

The existing building, which would provide the base for the proposed structure, is built to the property lines. The residential portion of the building would begin on the third (podium) level, rising to approximately 99 feet in height and would be set back at varying distances from the property lines. The east and west sides of the upper residential stories would be articulated in a "zigzag" alignment to form three vertical planes on these sides of the building. The three-bay massing thereby created would echo and be aligned with the three of the four pediments capping the eastern façade of the existing building. The façade would be further articulated by the protrusion of balconies from the second through seventh residential floors (i.e., fourth through ninth stories).

The ground floor would contain approximately 29,000 gsf including a lobby facing Colin P. Kelly Jr. Street, a 640-square-foot loading area, parking ramps, and the two retail spaces facing Townsend Street. The second floor would contain approximately 24,000 gsf dedicated to parking, including parking ramps. The podium level on Floor 3 would be about 14,421 gsf, with 9 residential units, about 2,767 sq. ft. of pool, pool deck, and fitness center, about 1,606 sq. ft. corridor, elevators, and exit stair; and approximately 6,066 gsf of common open space. Floors 4 through 7 would be about 114,686 sq. ft. each with 12 residential units per floor. Floor 8 would be about 11,516 sq. ft. with nine units, and the top floor (floor 9) would contain about 9,654 sq. ft. with five units and two private terraces.

The frontages on Townsend Street and Colin P. Kelly Jr. Street are 117 feet 6 inches long and 247 feet 8 inches, respectively. Vehicular access to the parking garage would be on Colin P. Kelly Jr. Street on the east side of the building via an existing opening in the historic building.

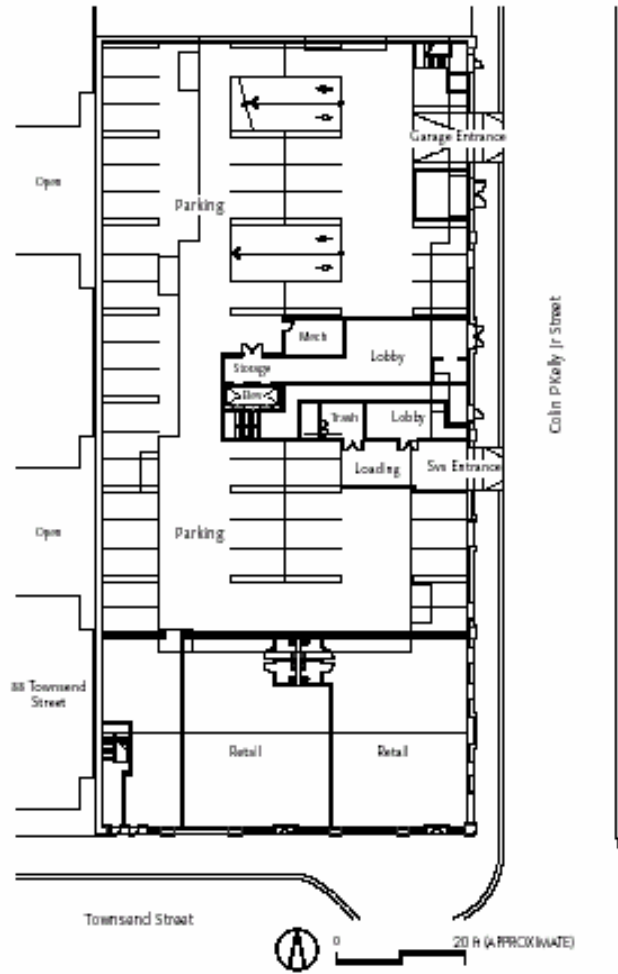
¹ To simplify the discussion of the direction of city streets south of and including Market Street, the convention of calling northwest-to-southeast streets "north-south" and northeast-to-southwest streets "east-west" is used in this document.



Source: During Associates

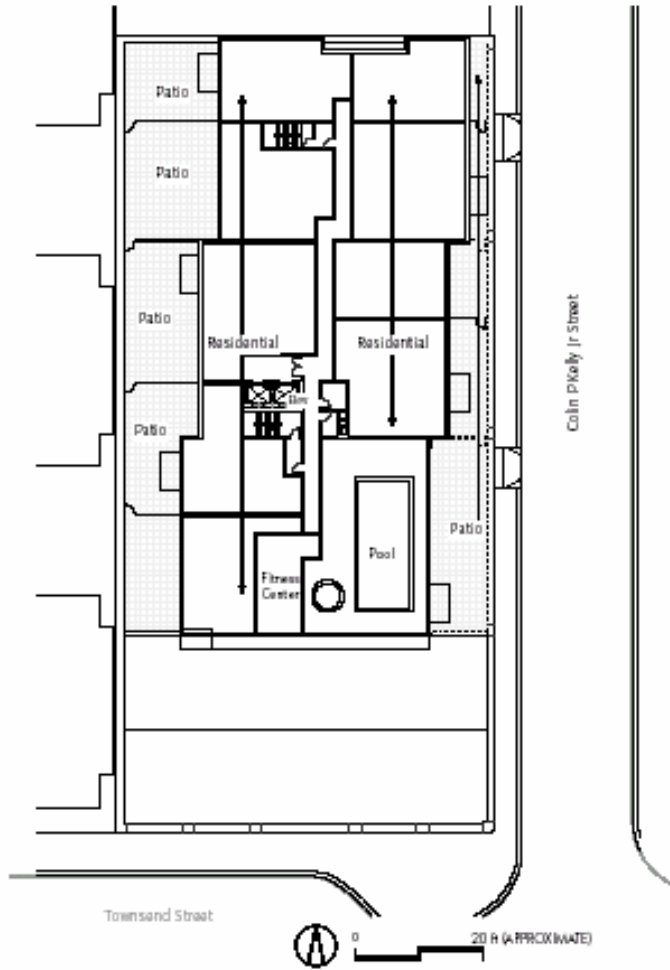
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Proposed Project Location Figure 1



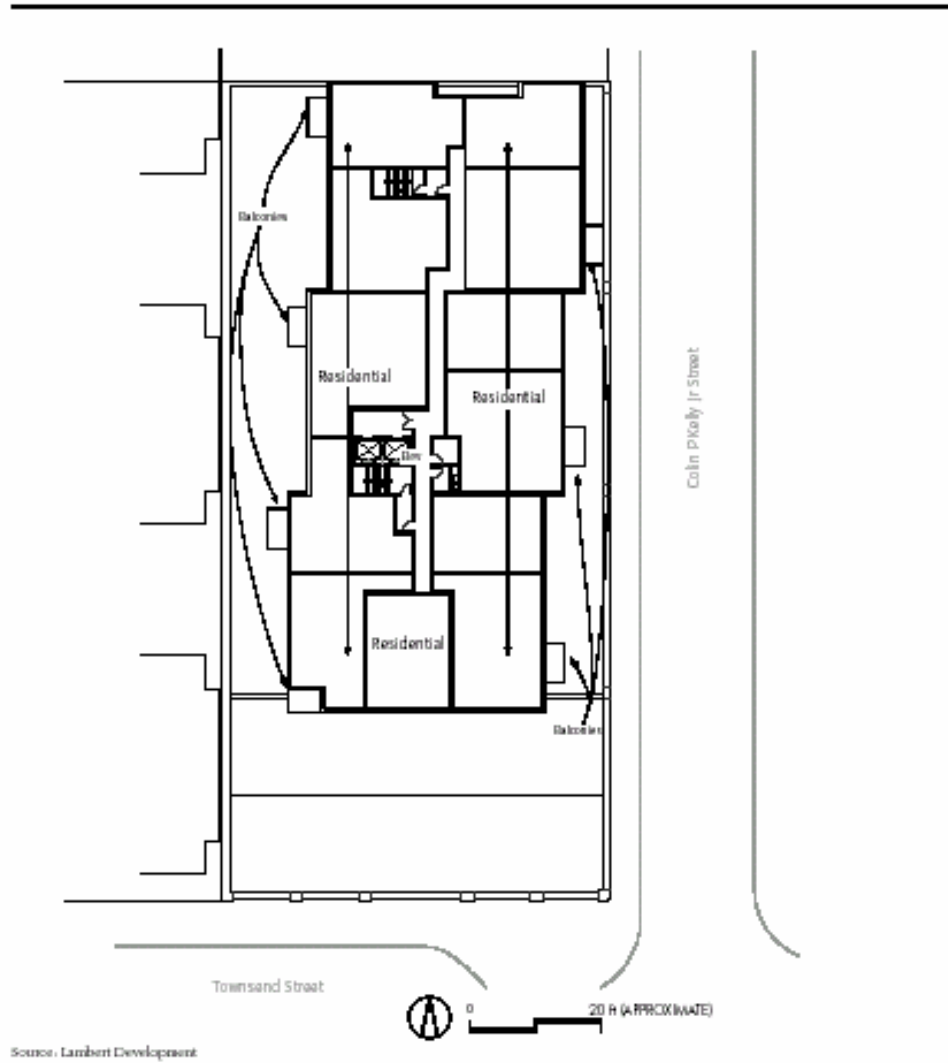
Source: Lambert Development
12/19/05

Proposed Ground Floor Plan Figure 2



Source: Lambert Development
12/19/05

Proposed Podium Level Floor Plan Figure 3



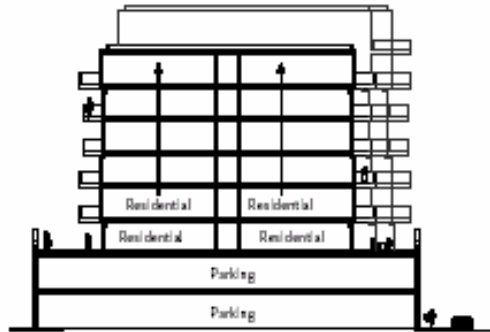
Source: Lambert Development
12/15/05

Proposed Residential Floor Plan Figure 4



Source: Lambert Development
12.19.08

Proposed Project Elevation Figure 5



0 20 ft (APPROXIMATE)

Source: Lambert Development
12-19-05

Proposed Project Sections Looking North Figure 6

The garage would contain 78 vehicle parking spaces and 4 bicycle spaces. There would be one loading dock on Colin P. Kelly Jr. Street, adjacent to the lobby entrance. Development of the site would require excavation of less than 50 cubic yards of soil for footings and foundation. The building would be constructed on a spread-footing foundation

The site is within the South Beach Subarea of the Rincon Point–South Beach Redevelopment Project Area, and is designated Commercial/Alternate Use: Residential in the *Rincon Point–South Beach Redevelopment Plan* (“*Redevelopment Plan*”). The project site is in the 40-105 foot height district in the *Rincon Point-South Beach Design for Development* (“*Design for Development*”) and 105–F Bulk District pursuant to Article 2.5 of the *San Francisco Planning Code*. It is also in the South End Historic District. The project would require an Owner’s Participation Agreement with the San Francisco Redevelopment Agency (“Agency”).

9. Site Description and Surrounding Land Uses:

The project site is located in the South Beach Subarea, a few blocks from the SBC Park baseball stadium and South Beach Harbor. The rectangular 29,098-square-foot project site is fully covered by a 31-foot-tall single-story warehouse building that was constructed in 1874 and escaped destruction in the 1906 earthquake and great fire that destroyed most of the area immediately north of the site.

A more detailed description of the surrounding land uses is provided in Section IX, Land Use and Planning, of the Environmental Checklist.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a “Potentially Significant Impact” as indicated by the checklist on the following pages. Although these factors are discussed in the Initial Study, further analysis of the potential significant adverse effects is required.

- | | | |
|--|--|--|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Agricultural Resources | <input type="checkbox"/> Air Quality |
| <input type="checkbox"/> Biological Resources | <input checked="" type="checkbox"/> Cultural Resources | <input type="checkbox"/> Geology/Soils |
| <input type="checkbox"/> Hazards & Haz. Materials | <input type="checkbox"/> Hydrology/Water Quality | <input type="checkbox"/> Land Use/Planning |
| <input type="checkbox"/> Mineral Resources | <input type="checkbox"/> Noise | <input type="checkbox"/> Population/Housing |
| <input type="checkbox"/> Public Services | <input type="checkbox"/> Recreation | <input checked="" type="checkbox"/> Transportation/Traffic |
| <input type="checkbox"/> Utilities/Service Systems | <input checked="" type="checkbox"/> Mandatory Findings of Significance | |

EFFECTS FOUND NOT TO BE POTENTIALLY SIGNIFICANT:

On the basis of the Initial Study evaluation, the proposed project would not have a significant adverse effect on the environment for the following environmental factors: scenic views, scenic resources; visual character; light and glare; agricultural resource; air quality effects on sensitive receptors; wind; shadow effects; biological resources; archaeological resources; paleontological resources; geology and soils; hazards and hazardous materials; noise; population and housing; public services; recreation; air traffic; and, utilities and service systems. These environmental factors are discussed in the Initial Study and require no further environmental analysis.

DETERMINATION:

On the basis of this initial evaluation:

- I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- I find that the proposed project MAY have a “potentially significant impact” or “potentially significant unless mitigated” impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on the attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.



Signature

1/10/06

Date

Stanley Muraoka

Printed name

Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

EVALUATION OF ENVIRONMENTAL IMPACTS:

The following environmental factors were assessed for potential adverse environmental impacts based on the project description, field observations, experience and expertise of the Initial Study preparers on similar projects, and review of prior environmental impact reports (“EIRs”) covering the project vicinity, including the *Rincon Point-South Beach Final Supplemental EIR*, certified on August 15, 1991, the *San Francisco Giants Ballpark Final EIR*, certified on June 26, 1997, and the *Brannan Square Mixed Use Final EIR*, certified on May 9, 2000, along with previous review of the site conducted in 1999. Additional sources for this Initial Study are cited in the relevant sections of the analysis.

I. AESTHETICS — *Would the project:*

a) *Have a substantial adverse effect on a scenic vista?*

Explanation: Scenic views in the project vicinity are limited to private views from the upper stories of high-rise buildings and public views available to pedestrians and motorists viewing westward up the view corridor along Townsend Street. The view up this corridor, created by the buildings flanking the street throughout its length, consists of distant views of the San Miguel Hills in Glen Canyon Park, about 4 miles west of the project site. These hills are frequently fog-shrouded during summer and early fall months. This view corridor is dominated by the wide thoroughfare of Townsend Street, the traffic it carries, and the urban development defining the corridor. The more scenic hillsides are visible only at the far end of the corridor, with little or no detail visible to the naked eye.

The view corridors created by other public streets near the project are terminated by urban buildings. The view eastward along Townsend Street is terminated by the buildings lining the street as it curves toward the south to intersect with The Embarcadero, approximately one block east of the project site. The one-block length of Colin P. Kelly Jr. Street, which runs along the east side of the project site, is very limited in scope and constrained by large building masses at either end of the street. In addition, at the north end, a large billboard structure is visible atop a six-story building. Views along Second Street, one block west of the project, are similarly constrained. The view to the south is terminated one block south of Townsend Street by Pacific Bell Ballpark, while the more distant end of the Second Street corridor to the north reveals the elevated freeway approach to the Bay Bridge and high-rise buildings downtown.

The near-distance views along all of the street corridors in the project vicinity are generally characterized by highly urbanized development consisting of a mixture of low-rise, mid-rise, and high-rise buildings housing residential, office, and commercial uses. The buildings were

Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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constructed across the span of the 20th Century, and reflect a variety of building materials and architectural styles.

Scenic views are generally considered to consist of, or at least include, views of the natural environment. The views available to the public in the project area consist entirely of urban landscapes. Therefore, the project would not adversely affect a scenic vista from a public vantage point.

Although the upper stories of mid-rise and high-rise buildings in the project vicinity may, depending on location, afford more expansive views of the city that many people would consider scenic, and/or views of San Francisco Bay, Treasure Island, and the East Bay hills to the east that would certainly be considered scenic, these views are private. Under the Guidelines of the California Environmental Quality Act (“CEQA”), changes to private views are generally not considered significant unless they affect a large number of people or constitute a dramatic degradation of views. Because of the project’s modest height relative to many taller residential buildings in the vicinity, expansive views from many locations would not be blocked by the proposed building. Views from lower floors of neighboring buildings would be interrupted in a number of cases, but due to their lower vantage point, such views would not be expansive. Such changes in near-distance views are addressed further in Section I(c), below, but would not be considered changes to scenic vistas. Due to the proximity to the Bay, some residential views from relatively low building floors in the area may afford scenic views to the east or south. However, because the other residential buildings in the area are located east or south of the project site, very few such views would be blocked by the project, if any. Views from some office locations west or north of the project site might be interrupted, but disruptions to a small number of office views would not be considered significant. For the above considerations, the proposed project’s impacts on private scenic views would be very limited, and would be considered less than significant.

- b) *Substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?*

Explanation: Scenic resources are generally considered to consist of elements in the natural environment or, historic buildings within a scenic highway corridor. Designation of a highway as scenic by the State of California is determined based on how much of the natural environment can be seen by travelers along the roadway. There are no scenic natural resources on or adjacent to the project site, and therefore there is no potential for the project to adversely affect such resources. Although the existing building is historic, it is not located within a State-designated scenic highway. The project’s potential impacts to historic resources are treated as a separate issue in Section V, below.

Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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c) *Substantially degrade the existing visual character or quality of the site and its surroundings?*

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Explanation: The existing visual characteristics in the vicinity of the project site are varied, reflecting changing development patterns, land uses, and architectural styles over the past hundred years.

General South of Market Form

The greater South of Market area is a highly heterogeneous area that includes the C-3 office district, dominated by office buildings ranging from low-rise to high-rise structures; Yerba Buena Center, a cultural center that includes museums, performance halls, public open space, and Moscone Convention Center; Rincon Point, characterized by office and commercial/restaurant uses; Rincon Hill, an area dominated by industrial buildings and surface parking lots; and South Beach, a former warehouse district increasingly giving way to residential, office, and general commercial uses.

The project area's proximity to San Francisco's waterfront has strongly influenced the historic pattern of development in the area. The expansive port facilities at the edge of the Bay led to extensive development of the area with large warehouses for processing and storage of goods transshipped through San Francisco prior to their distribution elsewhere in the State. This resulted in a concentration of massive buildings that provided greater uniformity of development than generally found elsewhere in the South of Market area. However, the demise of the shipping industry in this area starting in the middle of the 20th century brought an increase in retail and general commercial use as industrial uses and the need for warehouse space declined. Over time, the area has transitioned to a much more heterogeneous mixture of uses. During the past 20 years, a significant amount of housing stock has been added to the area, most of it in large developments that occupy all or a significant portion of a city block, or that is contained in one or more towers. These towers have provided an aesthetic link to the higher-rise neighborhoods to the north that are dominated by office development.

Comparatively low buildings along the waterfront contribute to the tapering of height with the decrease of elevation from hilltops to water that is characteristic of San Francisco; this pattern allows views of the Pacific Ocean and the San Francisco Bay. In the project vicinity, the transition from inland to the waterfront is similarly marked by a gradual stepping down of heights, as is recommended by Urban Design Element of the *General Plan*. Nearby buildings on the waterfront incorporate an intricate, staggered design and are set back from the waterfront above the building base and at upper levels. This design approach acknowledges the meeting of the land and water while respecting the natural topography of the area; reduces the appearance of a towering street wall; and helps maintain a pedestrian-friendly environment close to the waterfront.

Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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Project Vicinity

The project site is part of the South Beach Subarea of the Rincon Point-South Beach Redevelopment Project Area, which has historically been characterized by predominately low- to mid-rise industrial buildings and surface parking lots. The site is part of the South End Historic District designated by the City in 1990. The area has undergone a substantial transformation over the past 20 years as numerous comparatively high-intensity residential developments have been built. During this time, about 5,300 new housing units have been added to the redevelopment area, approximately 2,500 of them within a few blocks of the project site. The completion of the 41,000-seat Giants' ballpark in 2000 also has contributed significantly to the area's evolution in character.

The project vicinity is not characterized by a large degree of visual coherence. However, the project site straddles a relatively distinct transition zone between historic commercial buildings and newer residential developments. Its visual character to the north and west is primarily defined by older buildings, many of them of red brick masonry construction, ranging from three to six stories in height. Development to the east and south both jumps in height and changes in character and use. Many of the primarily residential buildings are relatively modest towers ranging between 13 and 17 stories in height, with more modern designs executed in glass, steel, and concrete. Most of these large residential developments provide space for neighborhood commercial uses and restaurants and cafes in the ground-floor levels. For the most part, these buildings are built to the property line, detracting from a pedestrian scale of development. Building heights in closer proximity to the Bay waterfront drop back down to the two- to four-story range, and provide an aesthetic transition to sea level at the waterfront. Some of the buildings closer to the waterfront are historic warehouses that have been adaptively retrofitted for reuse with residential and commercial uses.

The building at 88 Townsend Street immediately west of the project site functions as a bridge between the lower historic buildings north and west of the project and the taller, newer buildings immediately to the east and south. Similar to the proposed project, this building consists of a stucco-clad, one-story historic warehouse building converted to two stories of offices, atop which has been constructed a three-story residential brick building that is set back from the façade of the base building.

The project proposal would substantially alter the existing character of the site, but not in a way that would constitute a substantial degradation in the visual character of the site. The project would retain and adaptively reuse the existing building and construct an additional six stories on top of this base that would be set back from the east and west property lines. The building design would be attractive and visually compatible with the adjacent and nearby residential buildings. Similar to 88 Townsend Street, the building would create an effective visual transition from the three- to six-story masonry buildings to the north and west, and the residential towers to the east and south.

Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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A project would be considered to have a significant adverse impact on visual quality if it would cause a substantial demonstrable negative aesthetic effect. A project would have such an effect if it were to be substantially incompatible with the surrounding environment by introducing structures of substantially greater size, mass, or scale into the area. As noted above, the scale of the project would be consistent with the surrounding development, and would help to tie the lower-rise development to the north and west together with the higher-rise development to the east and south. The 93-foot-tall building would be taller than the 36-foot-tall building adjacent to the north and the 72-foot-tall building immediately to the west. However, it would be substantially shorter than the 156-foot tall South Marina Beach Apartments opposite the site (2 Townsend Street), as well as the 221-foot towers to the north at 243 Brannan Street and the 168-foot-tall condominiums at One Embarcadero South.

Based on the preceding considerations, the proposed project would not result in a substantial adverse effect on the project site or the project vicinity.

- d) *Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?*

Explanation: Additional light would be introduced by the proposed project that would include nighttime illumination and outdoor lighting typical of multi-residential buildings in the city. The project would comply with City Planning Commission Resolution No. 9212, which prohibits the use of mirrored or reflective glass. The proposed project would not contain mirrored or reflective glass and the building would not result in glare affecting other properties.

II. AGRICULTURAL RESOURCES — *Would the project:*

- a) *Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?*

Explanation: The proposed project will not affect farmland. Due to its urbanized character, the County of San Francisco is not included in the County maps of important farmland prepared biannually by the California Department of Conservation (a department of the California Resources Agency). The entire County is designated Urban and Built-Up Land on the latest

Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Statewide map of important farmland.² Urban and Built-Up Land is defined as land occupied by structures with a building density of at least 1 unit to 1.5 acres, or approximately 6 structures to a 10-acre parcel, and used for residential, industrial, commercial, construction, institutional, public administration, railroad and other transportation yards, cemeteries, airports, golf courses, sanitary landfills, sewage treatment, water control structures, and other developed purposes.

- b) *Conflict with existing zoning for agricultural use, or a Williamson Act contract?*

Explanation: There is no Williamson Act contract on the fully urbanized project site.

- c) *Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use?*

Explanation: There is no farmland on or in the vicinity of the fully urbanized project site.

III. AIR QUALITY — *Would the project:*

- a) *Conflict with or obstruct implementation of the applicable air quality plan?*

Explanation: The air quality agency with jurisdiction over the project site is the Bay Area Air Quality Management District (“BAAQMD”), which is responsible for monitoring regional air quality, developing regional clean air plans, and responding to citizen air quality complaints. BAAQMD is also the agency with permit authority over most types of stationary sources in the San Francisco Bay Area.

The Bay Area is currently designated as a nonattainment area for the State and federal ozone standards and as a nonattainment area for the State respirable particulate matter (PM₁₀) standard. The 2001 Bay Area Ozone Attainment Plan and the 2000 Bay Area Clean Air Plan have been developed by BAAQMD to address the ozone nonattainment issues. No PM₁₀ plan has been prepared or is required under State air quality planning law.

² “Important Farmland in California, 2002” (map), California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program, August 2004.

Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

b) *Violate any air quality standard or contribute substantially to an existing or projected air quality violation?*

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Explanation: The project would be located in a region that experiences occasional violations of ozone and PM₁₀ standards. Though the regional monitoring network no longer records violations of the carbon monoxide (“CO”) standard, congestion on busy roadways and intersections could lead to local CO hotspots, particularly during peak traffic hours. BAAQMD has prepared guidelines for conducting environmental review of construction projects in the San Francisco Bay Area with respect to air quality impacts, the *BAAQMD CEQA Guidelines*, which formed the basis for the analysis presented in this section.

Construction operations for any sizeable project have the potential to result in short-term but significant adverse air quality impacts. Although construction equipment emits CO and ozone precursors, these emissions are included in the emission inventory that is the basis for regional air quality plans, and are not considered by the BAAQMD to impede attainment or maintenance of ozone or CO standards in the Bay Area. However, PM₁₀ is emitted by construction equipment and is especially generated by site grading, excavation, movement of vehicles over unpaved surfaces, and as a result of wind erosion over exposed earth surfaces. Particulate emissions from these sources can contribute to adverse health effects and cause nuisance effects such as reduced visibility and deposition of dust on parked cars, window ledges, and other horizontal surfaces. Because PM₁₀ emissions can vary greatly due to fluctuations in a variety of influencing factors, the BAAQMD’s approach to CEQA analysis of construction impacts is to emphasize implementation of effective and comprehensive control measures rather than detailed quantification of emissions. The *BAAQMD CEQA Guidelines* identify control measures keyed to the size of construction project and state that if all of the control measures appropriate to the project size are implemented, air pollutant emissions from construction of the project are assumed to be less than significant.³ Absent implementation of the appropriate control measures, the project’s effects of construction-generated dust would be a potentially significant impact. Implementation all of the controls listed in Mitigation Measure AQ-1 would reduce the project’s construction-related air quality impacts to a less-than-significant level.

Mitigation Measure AQ-1: The project applicant shall require the construction contractor to reduce the severity of project construction period dust impacts by complying with the following control measures:

- Water all active construction areas at least twice daily. Consistent with Ordinance 175-91, only non-potable water shall be used for all dust-control purposes. The

³ *BAAQMD CEQA Guidelines: Assessing the Air Quality Impacts of Projects and Plans*, Bay Area Air Quality Management District, Section 2.3 and Table 2, revised December 1999.

Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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construction contractor shall obtain reclaimed water from the City’s Clean Water Program for this purpose.

- Cover all trucks hauling soil, sand, and other loose materials, or require all trucks to maintain at least 2 feet of freeboard.
- Pave, apply water two times daily, or apply non-toxic soil stabilizers on all unpaved access roads, parking areas, and staging areas at the construction site.
- Sweep daily (with water sweepers) all paved access roads, parking areas, and staging areas at the construction site.
- Sweep adjacent public streets daily (with water sweepers) if any visible soil material is carried onto the streets.
- Require construction contractors to (1) properly maintain construction equipment and vehicles in accordance with the manufacturers’ recommendations, and (2) minimize idling time when equipment is not in use and when trucks are waiting in queues. Include these provisions in all construction contracts.

For operational air emissions, the *BAAQMD CEQA Guidelines* provide screening criteria for determining whether the total emissions from a project may exceed any of the air quality thresholds of significance. For residential apartment projects, the size of project likely to generate 80 pounds or more of nitrogen oxides (“NO_x”) per day is 510 dwelling units. Although the BAAQMD still recommends that a more detailed air quality impact analysis be conducted for any project whose size is within 20 percent of the applicable screening criterion, the proposed project’s 74 dwelling units would fall well short of the threshold size.

The screening criteria for NO_x are used as an indication of whether or not a project has the potential to exceed the thresholds of significance for other criteria pollutants, such as reactive organic gases (“ROG”) and PM₁₀, with the exception of localized CO concentrations. The *BAAQMD CEQA Guidelines* identify separate screening criteria for CO as an indication of a project’s potential to exceed the State Ambient Air Quality Standard of 20 parts per million (“ppm”) for 1 hour and 9 ppm averaged over 8 hours. Those criteria state that localized CO concentrations shall be estimated for projects which would impact roadway intersections operating at Level of Service (“LOS”) D, E, or F or cause the LOS to decline to D, E, or F, or would increase traffic volumes by 10 percent or more (unless the increase is less than 100 vehicles per hour). A project that would generate vehicle emissions of CO in excess of 550 pounds per day would have the potential to violate the State standard.

- c) *Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable*
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Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

Explanation: According to BAAQMD significance criteria, any proposed project that would individually have a significant air quality impact would also be considered to have a significant cumulative air quality impact. Since the proposed project would not exceed the BAAQMD thresholds of significance for ROG, the project would not have a significant cumulative impact on regional air quality for any criteria pollutant.

d) *Expose sensitive receptors to substantial pollutant concentrations?*

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Explanation: Construction activities such as clearing, excavation, and grading operations, construction vehicle traffic, and wind blowing over exposed earth would generate exhaust emissions and fugitive particulate matter emissions that would temporarily affect sensitive receptors (i.e., residents) in the vicinity of the proposed project. The nearest sensitive receptors to the project site are the residents of apartment buildings located opposite the project site, across Townsend and Colin P. Kelly Jr. Streets. The closest residences are located approximately 75 feet from the site property line. There are no schools, hospitals, or other sensitive receptors in proximity to the site.

Pollutant emissions and odors would be generated by construction equipment during construction of the project. The use of diesel equipment would be greatest during the early phases of construction when grading is occurring and during later phases when materials such as asphalt and concrete are delivered to the site by truck. While diesel odors (and their accompanying pollutants) may be noticeable beyond the project boundaries under certain wind conditions, this effect would only occur for a limited time and for a limited distance beyond the project site boundaries. In general, the equipment emissions would be highly localized and natural atmospheric dispersion would carry the emissions aloft; residents inside their homes would generally not be adversely affected. Following construction, generation of pollutants would be limited to emissions from vehicles traveling to and from the site. Again, these emissions, which are addressed in Section III(b), would be limited and would be carried aloft by atmospheric dispersion.

Other adverse effects of construction activities would include increased dustfall and locally elevated levels of particulate matter downwind of construction activity. PM₁₀ is the pollutant of greatest concern with respect to construction activities.⁴ More of a nuisance than a hazard for

⁴ BAAQMD CEQA Guidelines.

Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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most people, this dust could affect persons with respiratory diseases, as well as sensitive electronic or communications equipment. Construction activities would not involve burning of any materials and would not create objectionable odors. The construction activities would temporarily affect local air quality for a period of ten months (approximately three weeks would be required for demolition, six weeks would be devoted to excavation, two months would be devoted to foundation work, and ten months would be devoted to erection and finishing, with some overlap between the different phases of work). Construction dust has the potential for creating a nuisance at nearby properties. Potentially significant PM₁₀ emissions from site grading are addressed above in Section III(b). While potentially significant impact, Implementation of Mitigation Measure AQ-1 (see Section III(b)) would ensure that the effects of construction-generated dust would remain less than significant.

- e) *Create objectionable odors affecting a substantial number of people?*

Explanation: The only potential for generation of objectionable odors from the project would be the emission of diesel exhaust during construction. See Section III(d) for a discussion of construction emissions and their associated odors.

- f) *Alter wind, moisture or temperature (including sun shading effects) so as to substantially affect public areas, or change the climate either in the community or region?*

Explanation:

Wind

A wind impact evaluation for the proposed project was performed by a certified consulting meteorologist, the results of which are presented below.⁵

Winds in San Francisco are generally from the west, off the Pacific Ocean. Wind speeds, in general, are greatest in the spring and summer, and least in fall. Daily variation in wind speed is evident, with the strongest wind in the late afternoon and lightest winds in the morning.

⁵ *Wind Impact Evaluation for the Proposed 72-74 Townsend Project*, Donald Ballanti, Certified Consulting Meteorologist, Letter to Stu During of During Associates, August 13, 2005.

Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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Ground-level wind accelerations near buildings are controlled by exposure, massing, and orientation. Exposure is a measure of the extent that the building extends above surrounding structures into the wind stream. A building that is surrounded by taller structures is not likely to cause adverse wind accelerations at ground level, while even a small building can cause wind problems if it is freestanding and exposed.

Massing is important in determining wind impact because it controls how much wind is intercepted by the structure and whether building-generated wind accelerations occur above ground or at ground level. In general, slab-shaped buildings have the greatest potential for wind problems. Buildings that have an unusual shape or utilize setbacks have a lesser effect. A general rule is that the more complex the building is geometrically, the lesser the probable wind impact at ground level.

Orientation determines how much wind is intercepted by the structure, a factor that directly determines wind acceleration. In general, buildings that are oriented with their wide axis across the prevailing wind direction will have a greater impact on ground-level winds than a building oriented with its long axis along the prevailing wind direction.

The project site is located on the northwestern corner of Townsend Street and Colin P. Kelly Jr. Street. Building heights near the project vary between two and six stories, with larger structures located to the south and east. The site currently is occupied by a two-story building.

The site is partially sheltered from prevailing winds. For the prevailing wind directions buildings of three to six stories shelter the project site. The terrain in the immediate vicinity of the site slopes upward to the northwest.

The project would be relatively narrow with its long axis along southwest to northwest. For the prevailing wind directions, the project offers a very narrow profile and provides a non-continuous, articulated building face that would act to limit the strength of any wind accelerations when the wind blows from these directions. Due to the massing of the structure, any wind accelerations generated by the tower portions of the project would occur over portions of the podium level or over the rooftops of adjacent buildings, and thus would not affect pedestrian space near the site. The podium level with an indoor swimming pool and open space would be behind the residential tower portion of the site and generally would be protected from the wind. Based on considerations of exposure, massing, and orientation, the independent consultant does not expect the project to have the potential to cause significant changes to the wind environment in pedestrian areas adjacent to or near the site. Thus, the wind impacts of the proposed project would not be considered significant.

Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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Shadow

A shadow fan analysis was prepared to identify the maximum shadow cast by the project. The analysis concluded that project-generated shadow would not reach any public open spaces under the jurisdiction of, or to be acquired by, the San Francisco Recreation and Park Department from shadowing by new structures during the period between one hour after sunrise and one hour before sunset, year round. The project, however, would at times shade portions of the streets and sidewalks of Brannan, Second, Townsend, and Colin P. Kelly Jr. Streets and The Embarcadero; and nearby buildings, including residences. The new shadows created by the project would not exceed levels commonly expected in urban areas, and would not be considered significant.

IV. BIOLOGICAL RESOURCES — *Would the project:*

- a) *Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?*
- | | | | |
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| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
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Explanation: The project site is within a fully developed area of the city, and is completely covered by impervious surfaces. The site does not provide habitat for any rare, endangered, or other special-status plant or animal species, and the proposed project would not affect, or substantially diminish, plant or animal habitats.

- b) *Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?*
- | | | | |
|--------------------------|--------------------------|--------------------------|-------------------------------------|
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|--------------------------|--------------------------|--------------------------|-------------------------------------|

Explanation: As noted above, the project site is completely covered by impervious surfaces. There is no riparian habitat, wetlands, or any other kind of natural habitat. There is therefore no potential for adverse effects on natural habitats or communities.

- c) *Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct*
- | | | | |
|--------------------------|--------------------------|--------------------------|-------------------------------------|
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|--------------------------|--------------------------|--------------------------|-------------------------------------|

Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

removal, filling, hydrological interruption, or other means?

Explanation: See Section IV(b).

- d) *Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?*
- | | | | |
|--------------------------|--------------------------|--------------------------|-------------------------------------|
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|--------------------------|--------------------------|--------------------------|-------------------------------------|

Explanation: The project site is not utilized in any manner by resident or migratory fish or wildlife species, and the project would not interfere with the movement or activities of such species.

- e) *Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?*
- | | | | |
|--------------------------|--------------------------|--------------------------|-------------------------------------|
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|--------------------------|--------------------------|--------------------------|-------------------------------------|

Explanation: The proposed project would not conflict with any local policies or ordinances protecting biological resources. There are no biological resources on the site, and the project would provide street trees and landscaping on the podium open space areas.

- f) *Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?*
- | | | | |
|--------------------------|--------------------------|--------------------------|-------------------------------------|
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|--------------------------|--------------------------|--------------------------|-------------------------------------|

Explanation: No trees would be removed. The open space proposed as part of the project would include plants and street trees appropriate for the urban landscape of the project site.

V. CULTURAL RESOURCES — *Would the project:*

- a) *Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?*
- | | | | |
|-------------------------------------|--------------------------|--------------------------|--------------------------|
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
|-------------------------------------|--------------------------|--------------------------|--------------------------|

Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Explanation: The information presented in this section is based on an evaluation of the project building by the architectural historians Page & Turnbull,⁶ as well as documents prepared for the Landmarks Preservation Advisory Board (“LPAB”) on the South End Historic District.^{7, 8}

South End Historic District

The project is located in the South End Historic District established under ordinance by the City in 1990. The irregular-shaped district is roughly bounded by Bryant Street on the north, King Street on the south, Third Street on the west, and First Street on the east, and encompasses 73 Assessor’s Lots. The South End Historic District includes a concentration of diverse warehouse buildings that were constructed during the century between 1860 and 1960 and which served the waterfront and port facilities that were instrumental in San Francisco’s development into one of the world’s great cities.

The primary period of historical significance of the district—1867 to 1935—comprises the era when the waterfront was a vital component of the State’s maritime commerce. This eminence derived from the natural suitability of San Francisco’s port, which was sheltered, with deep water, and readily accessible to overseas markets and to a network of rivers and canals east of San Francisco that facilitated the distribution and importation of goods to and from inland areas. The export of agricultural products and mineral resources, including gold, and the importation of finished goods, constituted the primary basis of San Francisco’s economy during the district’s period of historical significance. A vast amount of storage space was required to serve the historic maritime industry in the city, whether it is short-term accommodation of irregularities in commerce traffic or more lengthy storage in anticipation of future market demands. Since San Francisco functioned as a distribution center, temporary storage was also often required before the subsequent shipment of goods to a secondary market. In response to these needs, an extensive warehouse district developed over time in proximity to the waterfront.

The rich diversity in architectural forms represented in the South End Historic District provided a compelling rationale for its designation and the protection it affords to the historic buildings within its confines. At least eleven properties in the district are either on or have been determined eligible for inclusion on the National Register of Historic Places. Hooper’s South End Grain Warehouse, the existing historic building on the proposed project site, has been assigned a designation of “2S2” by the California Office of Historic Preservation (“OHP”), indicating that it has been determined eligible for the National Register through the Section 106 process, and is listed in the California Register of Historic Resources.

⁶ *Hooper’s South End Grain Warehouse*, Page & Turnbull, June 16, 2005.

⁷ *South End Historic District Case Report*, Paul Lord, Jr., Prepared for the Landmarks Preservation Advisory Board, February 5, 1990.

⁸ *South End Historic District*, Michael Schwarzer, Prepared for the Landmarks Preservation Advisory Board, January 29, 1986.

Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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Only eight buildings in the district predate the 1906 earthquake, including Hooper's Warehouse. The majority of the buildings were constructed between 1906 and 1929, during which time maritime commerce increased dramatically. While the buildings predating the earthquake were utilitarian structures whose design was governed by functional considerations, with aesthetic contributions generally occurring by means that had only low-cost ramifications, most warehouses constructed after 1906 were designed by academic architects, who favored greater articulation in building façades and were typically influenced by the European Beaux Arts style. Thus, while nineteenth century buildings presented large expanses of unbroken brick walls, such as along Second Street, the early twentieth century buildings favored concrete construction with embellishments such as parapets, simple cornices, pilasters, and advertising signs. Nonetheless, due to the size of many warehouse buildings and the restraint employed on ornamentation, large expanses of blank walls were still common.

The evolving design of warehouses in the South End Historic District was driven substantially by changes in the technology of commerce. Early warehouses were generally one story in height, both due to the availability of inexpensive land in proximity to waterfront piers and to the need to permit the passage of wagons and drays to interior storage areas. By 1900, the importance of rail transport led to the extension of railroad spurs into building interiors, leading to larger doorways. The rising of land costs also drove a move to multi-story buildings, facilitated by the availability of affordable freight elevators by this time. This trend was reversed following the invention of the forklift in the 1930s, because forklifts would usually not fit inside elevators with their cargo, rendering movement of goods to, from, and within upper stories logistically difficult. This constraint has led to the nearly universal construction of one-story warehouses in the United States since 1945.

Historical Significance of the Project Building

Hooper's South End Grain Warehouse was built in 1974 by trader John Hooper for the storage of grain prior to transshipment out of state. When it was constructed, it represented the most modern warehouse techniques, whose primary considerations were fire-resistance, structural stability, security, and cost-efficiency. Grain had emerged in the early years of Statehood as California's first export crop, leading to the establishment of at least four warehouses in the South End area specializing in grain. By 1898, grain exports of 40 million bushels had established California as the leading grain-producing state in the nation, and secured dominance in agricultural production that has continued uninterrupted until the present.

Following the purchase of Hooper's Warehouse by the Morton Draying and Warehouse Company in 1888, the building became known as Morton's South End Warehouse. For a time the warehouse was the flagship building (now called the South End U.S. Bonded Warehouse) of the South End Warehouse Company, formed in 1902 and comprising a total of four warehouses. The company's central building shifted down the block when the four-story brick warehouse at

Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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625 Second Street was completed in 1905. By this time, storage in the former Hooper's Warehouse had shifted from grain to general merchandise, primarily iron pipe and cement.

The project building was one of the few buildings in the district to be spared by the catastrophic fire that leveled large sections of San Francisco following the 1906 earthquake. As the area was reconstructed with concrete, multi-story warehouses, one-story warehouses like Hooper's became obsolete. By 1911 the building had been subdivided into a restaurant and saloon at the Townsend Street frontage, and the rear was utilized for storage. This allocation of space, with a commercial front and rear storage, continued until the building was renovated in 1999.

Historic Status of Hooper's Warehouse

The San Francisco Architectural Heritage ("Heritage") conducted an architectural survey of the South of Market area in 1984, as documented in the publication *Splendid Extended*. This work represented an expansion of *Splendid Survivors*, the influential Downtown survey conducted by Heritage in 1977 and 1978. *Splendid Extended* assigns Hooper's South End Grain Warehouse a "B" rating, denoting it as of "Major Importance." According to *Splendid Extended*, the Major Importance rating is assigned to "buildings which are of individual importance by virtue of architectural, historical and environmental criteria. These buildings tend to stand out for their overall quality rather than any particular outstanding characteristics. B-group buildings are eligible for the National Register, and are of secondary priority for City Landmark status." It should be noted that the Heritage rating of the building predated substantial modifications made to the building in 1999, as discussed below.

As previously noted, the OHP has assigned Hooper's South End Grain Warehouse a Status Code of 2S2. The OHP rates historic buildings by a system of codes running from 1 through 7. Properties with a Status Code of 1 are listed in the California or National Register, while those with Status Code 2 have been formally determined eligible for such listing. Status Codes 3 through 5 indicate decreasing levels of historic significance. Status Code 6 is assigned to properties that have been found ineligible for listing in any register, and Status Code 7 indicates that a property has not yet been evaluated by OHP. The project building's Status Code 2S2 indicates that it has been found eligible for listing in the National Register of Historic Places and has already been listed in the California Register of Historic Resources.

On the local level, Hooper's Warehouse is recognized as a Contributory Building to the South End Historic District. Pursuant to Section III.A. of the *Redevelopment Plan*, the proposed project shall be submitted to the LPAB for review and comment. The LPAB shall submit its recommendation on the project to the City Planning Commission, which shall then forward its recommendation and that of the LPAB to the Agency.

Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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1999 Adaptive Reuse Project

Hooper's South End Grain Warehouse was substantially altered in 1999 as part of a seismic upgrade and adaptive reuse project. The building was divided into three sections to provide a restaurant along the entire Townsend Street façade, office space in the middle, and a 13-car parking garage at the rear. The building was covered by a thick, exaggerated dash coat of new stucco on top of the original stucco, and the façades along both Townsend and Colin P. Kelly Jr. Streets were modified. In addition to the removal of all original doors and windows, new door openings were created. Along Townsend Street, a new door was added to the westernmost bay of the five-bay façade, and a large storefront window system replaced the (non-original) walls in the central and two eastern bays. A new exposed brick arch, resembling the original building arches, was added around the main entrance in the central bay. Along the Colin P. Kelly Jr. Street façade, four narrow arched doors with transoms and two wide service doors topped by arched vents were added. Although two original, wide arched openings were preserved, the bricks forming the arches were replaced.

Interior modifications also necessitated removal of original building components, most notably the floor. New timber trusses were added to the existing roof trusses, for increased strength, and new ledges, plates, and bolts were added to the roof framing system. The skylights were replaced, though the original framing was apparently retained. An original brick wall was retained to separate the planned restaurant and office uses, while a new concrete demising wall was added between the office and garage spaces. A partial second story was added above the restaurant and office spaces, and a full second story was added above the garage, to provide additional office space. A layer of shotcrete was applied to the interior face of all four exterior walls.

The evaluation by Page & Turnbull concluded that many historic elements and characteristics were lost in the 1999 adaptive reuse of Hooper's South End Grain Warehouse. Although the building retains the original long, low massing, the sense of solidity and enclosure on the Townsend Street façade has been lost. The dash coat of stucco diminishes the crispness of the water table, cornice, and other historic projections on the building, and the more recessed doors and windows create deeper shadows than originally shown. Despite the increase in openings along Colin P. Kelly Jr. Street, this façade retains much of its original solid character.

Potential Impacts of Proposed Project

The proposed project would retain the existing building façades and add a six-story residential structure on top of the existing warehouse. The addition would require the removal of the existing roof, including the original heavy timber posts and trusses. The proposed residential structure would be broken into four bays that correspond to the four bays on the Colin P. Kelly Jr. Street façade of the existing warehouse building. Although the 1999 modifications to the building degraded the historic character of the building in terms of surface finish and

Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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fenestration, it did not alter the overall form of the building. This form would, however, be substantially altered by the addition of the residential structure. Particularly when considered cumulatively with the changes that have already occurred, the proposed modifications would constitute a *significant, adverse impact* on historic resources. Page & Turnbull identified the following mitigation measures to reduce the impact of the project:

Mitigation Measure CR-1: Remove the non-historic stucco finish. Prior to 1999, Hooper's South End Grain Warehouse was stuccoed, and experts disagreed about whether or not it was originally exposed brick or stucco. Further testing should be conducted, but the existing stucco is clearly non-historic and damaging to the building's character. If it is possible to remove it without damaging the brick below, removing it to expose the brick, or removing it and applying a stucco finish that more closely approximates an historic finish would offer one means of mitigating the effect posed by the residential addition.

Mitigation Measure CR-2: Decrease the level of fenestration on the Townsend Street facade. Through incremental change and the 1999 project, the Townsend Street facade has been drastically opened, losing the sense of enclosure that is characteristic of this warehouse type. By decreasing the size of openings and rebuilding some of the former wall, the proposed project could partially mitigate the impact of the construction of the new residential structure.

Mitigation Measure CR-3: Remove the non-historic chamfered corner and replace it with a storefront aligned with the streets.

Mitigation Measure CR-4: (1) Document the history and the existing exterior and interior conditions of Hooper's South End Grain Warehouse according to the *Historic American Buildings Survey* ("HABS") Level II documentation in addition to the other mitigation measures identified; and (2) install on-site displays communicating the historic significance of the building and the historical location of the shoreline.

(1) According to HABS standards, Level II documentation consists of the following tasks:

- *Drawings:* Existing drawings, where available, should be photographed with large format negatives or photographically reproduced on mylar.
- *Photographs:* Photographs with large-format negatives should be shot of exterior and interior views or historic views where available. These should be printed on archival fiber paper.
- *Written data:* A report documenting the existing conditions and history of the building should be prepared.

Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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The completed documentation package would be submitted to local and regional archives, including but not limited to, the San Francisco Public Library History Room, the California Historical Society and the Northwest Information Center at Sonoma State University in Rohnert Park.

- (2) Install a plaque at the front of the building to communicate its historic significance. In addition, the sidewalk around Hooper’s South End Grain Warehouse makes indications about the historic location of the shoreline, which once passed underneath the corner of the building. The existing pavement does not continue those lines to the edge of the building. When relaying concrete around the building, continue the historic lines up to the edge of the building.

Even with implementation of Mitigation Measures CR–1 through CR–4, the project’s impact on historic resources would not be reduced to a less than significant level. This would therefore be a ***significant and unavoidable impact***.

- b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

Explanation: : The information presented in this section is based on an archeological resources evaluation of a project located approximately 600 feet from the proposed project site,⁹ as well as an archival search performed by the Northwest Information Center (“NIC”) at Sonoma State University¹⁰ and historic maps. As warranted, information presented in the archeological resources evaluation report has been adapted to reflect conditions at the 72 Townsend Street site.

In its natural state, the project site was situated at the very edge of the original Bay shoreline on a promontory known as Steamboat Point.¹¹ The site was immediately east of a steep, brush-covered hill, sometimes referred to as Malakoff Hill, which reached slightly more than 100 feet above sea level. The vegetation at the site was probably similar to that of most of the northern San Francisco peninsula – mainly grasses, scrub brush, and occasional stands of oak trees or willows. The southern portion of the site ranged from sea level to a few feet above sea level, while the northern portion of the site was submerged by Bay waters.

⁹ *Archival Cultural Resources Evaluation of the Proposed 175–179 Townsend/170 King Street Development Project, San Francisco, California*, Allen G. Pastron, Ph.D., Archeo–Tec, January 28, 2000.

¹⁰ *Rapid Response Record Search Results for the Proposed 72 Townsend Street Residential Condominiums, City and County of San Francisco, California*, NWIC File No. 05–80, California Historical Resources Information System, Northwest Information Center, Sonoma State University, July 26, 2005.

¹¹ *City of San Francisco and its Vicinity, California*, U.S. Coast Guard, U.S. Coast Guard Survey, 1859.

Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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The project site is situated in what was, prior to the arrival of the first Europeans, the northwestern portion of the territory occupied by the Costanoan people, a Native American group also referred to in anthropological literature as the Ohlone. Several deeply buried, previously unrecorded prehistoric sites have been recently discovered in the South of Market area, some of them near the project site. These deeply buried sites remained intact despite the topographical alteration that has taken place since the 1850s. An assessment of the characteristics of these archeological sites and their proximity to the shoreline of Yerba Buena Cove and the marshes bordering Mission Bay suggests that similar prehistoric/protohistoric (up to 1775 A.D.) archeological deposits may exist within or adjacent to the proposed project site.

Archival data indicate that there is little likelihood of encountering potentially significant cultural deposits associated the Spanish, Mexican, or Early American periods. Between the appearance of the first Spanish ship to sail through the Golden Gate in 1775 and the discovery of gold in 1848, population and maritime traffic in the San Francisco Bay area were extremely limited. The Mission Dolores and the Presidio, the principal centers of activity, were located at a considerable distance from the site. There is no evidence that any of the early historic period activities at Yerba Buena, or in the vicinity of Rincon Point, had any impact whatever on the present project site or its immediate surroundings.

The first settlement and development of the South of Market area in which the project site is located began during the Gold Rush era (1849-1857). After serving as a jumping-off point for prospectors waiting to travel to the Sierra gold fields, the area was initially developed with dozens of iron foundries and heavy machinery manufacturers. However, the project site appears to have remained completely undeveloped and unoccupied throughout the early 1850s.

The buried hulk of the Lydia, an 1840s whaler, was unexpectedly discovered in 1978 near the intersection of King Street and the Embarcadero. Due to the project site's location at the margin of the 1850s shoreline of San Francisco Bay, there exists some potential for encountering the remains of a buried ship within the borders of the project site

During the later 19th Century Period (1858-1906), the topography in the South of Market area was drastically altered, with all of the region's great sand hills systematically reduced over a period of about 20 years. The material excavated from the hillsides was used to fill in the waters of Yerba Buena Cove and Mission Bay, extending the city's shoreline eastward by up to 1,000 feet.

Systematic topographic change in and around the project site began in the mid-1860s. Townsend Street was filled, graded, and planked in 1867. Fill was added to the project site and extending eastward, bringing the site's elevation to about 10 feet above sea level in the southern portion of

Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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the site, rising to about 15 feet above sea level in the northern portion of the site.¹² It is conceivable that potentially significant cultural deposits were buried during these fill operations, and remain buried within the project site, particularly within the southern end.

From the early 1870s until the end of the nineteenth century, the project site and its surroundings were occupied by a variety of industrial concerns. By the close of the 1920s, the project site and the block surrounded by Townsend, Colin P. Kelly Jr. (formerly Japan Street), Second, and Brannan Streets had assumed the basic demographic, architectural, and economic traits that have characterized this portion of San Francisco's northeastern waterfront for the remaining decades of the twentieth century.

In summary, it is unlikely, although not impossible, that subsurface cultural materials from the Spanish/Mexican and/or Early American periods would be encountered anywhere within the proposed project site. However, according to the NIC, there is a high possibility that prehistoric/protohistoric cultural remain within the project site and vicinity. It is also likely that cultural material from the Later Nineteenth Century and/or Early Twentieth Century will be encountered on the project site, although these would be of less potential significance than any cultural deposits from the Prehistoric/Protohistoric, Early Historic, or California Gold Rush eras.

Construction of the project would require less than 50 cubic yards of material to be removed. Given the potential presence of archeological resources on the site, a program of pre-construction archeological testing and evaluation is recommended to determine the presence or absence of subsurface archeological resources of significance. The project sponsor would implement Cultural Resources Mitigation Measure 5, below, to reduce the potentially significant disturbance, damage, or loss of archeological resources during project construction to a less than significant level.

Mitigation Measure CR-5: The following mitigation measure is required to avoid any potential adverse effect from the proposed project on accidentally discovered buried or submerged historical resources as defined in *CEQA Guidelines* Section 15064.5(a)(c), including human or associated funerary remains. The project sponsor shall retain the services of an archaeologist. During any soils disturbing activities within the project site, the archaeologist shall carry out a pre-excavation testing program to better determine the probability of finding archaeological remains on the site. The testing program shall consist of a series of mechanical exploratory borings or trenches and/or other testing methods determined to be appropriate by the archaeologist.

If, after testing, the archaeologist determines that no further investigations or precautions are necessary to safeguard potentially significant archaeological resources, the archaeologist shall submit a written report to the City's Environmental Review Officer

¹² "San Francisco North, 15' Quadrangle" (map), U.S. Geological Society, 1947.

Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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("ERO"), with copies to the project sponsor and the Agency. If the archaeologist determines that further investigations or precautions are necessary, he/she shall consult with the ERO, and they shall jointly determine what additional procedures are necessary to minimize potential effects on archaeological resources.

These additional mitigation measures shall be implemented by the project sponsor and might include a program on on-site monitoring of any site excavation and foundation work that may be necessary, during which the archaeologist shall record observations in a permanent log. Whether or not there are archaeological finds of significance, the archaeologist shall prepare a written report on the monitoring program that shall be submitted first and directly to the ERO with copies to the project sponsor and Agency. During the monitoring program, the project sponsor shall designate one individual on site as his/her representative. This representative shall have the authority to suspend work at the site to give the archaeologist time to investigate and evaluate archaeological resources that may be encountered.

Should evidence of cultural resources of potential significance be found during the monitoring program, the archaeologist shall immediately notify the ERO, and the project sponsor shall halt any activities which the archaeologist and the ERO jointly determine could damage such cultural resources. Ground disturbing activities which might damage cultural resources would be suspended for a total maximum of four weeks over the course of construction.

After notifying the ERO, the archaeologist shall prepare a written report to be submitted first and directly to the EIR, with copies to the project sponsor and Agency, which shall contain an assessment of the potential significance of the archaeological finds and recommendations for what measures should be implemented to minimize potential effects on archaeological resources. Based on this report, the ERO shall recommend specific additional mitigation measures to be implemented by the project sponsor. These additional mitigation measures might include a site security program, additional on-site investigations by the archaeologist, and/or documentation, preservation and recovery of archival material.

Finally, the archaeologist shall prepare a report documenting the archaeological resources that were discovered, and evaluation as to their significance, and a description as to how any archaeological testing, exploration and/or recovery program was conducted.

Copies of all draft reports prepared according to this mitigation measure shall be sent first and directly to the ERO for review. Following approval by the ERO, copies of the final report shall be sent to the President of the Landmarks Preservation Advisory Board and the Northwest Information Center. Three copies of the final report shall be submitted to the Office of Major Environmental Analysis, accompanied by copies of the transmittals

Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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documenting distribution to the President of the Landmarks Preservation Advisory Board and the Northwest Information Center.

- c) *Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?*

Explanation: Due to the previous surface disturbance of the site and the fact the project would entail only limited subsurface disturbance during site grading, the potential for encountering paleontological resources on the project site is considered low. Nonetheless, any destruction of unique paleontological resources during earthmoving activities would be a **potentially significant impact**. Implementation of the following measure would reduce this potential impact to a less than significant level:

Mitigation Measure CR-6: If any paleontological resources are encountered during site grading or other construction activities, all ground disturbance shall be halted until the services of a qualified paleontologist can be retained to identify and evaluate the resource(s) and, if necessary, recommend mitigation measures to document and prevent any significant adverse effects on the resource(s).

- d) *Disturb any human remains, including those interred outside of formal cemeteries?*

Explanation: See Section V(b).

VI. GEOLOGY AND SOILS — *Would the project:*

- a) *Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:*
- i) *Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.*

Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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Explanation: The nearest active earthquake faults to the project site are the San Andreas and San Gregorio faults, located approximately 7.5 and 12 miles to the west, respectively, and the Hayward fault, located about 9 miles to the east. The nearest Alquist-Priolo Special Studies Zones would be associated with these faults. There is therefore no potential for fault rupture on the project site. However, as discussed below in Section VI(a)(ii), there is potential for strong seismic shaking from earthquakes on these faults.

ii) *Strong seismic ground shaking?*

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Explanation: Similar to most urban locations throughout the Bay Area, the project site is potentially subject to strong seismic ground shaking during an earthquake on one of the major active earthquake faults that transect the region. At least four known earthquakes of Richter Magnitude (“RM”) 7 or greater have occurred within the San Francisco Bay Area within the last 150 years, and it is likely that an earthquake of similar magnitude will be experienced during the life of the project. The U.S. Geological Survey estimated in 1999 that there is a 27 percent probability that an earthquake of RM 6.7 or greater will occur before 2032 on the Hayward fault, with a 21 percent probability of such an earthquake occurring on the San Andreas Fault. Thus, there is a high probability that strong ground shaking will be experienced at the site during moderate to severe earthquakes in the region.

The Community Safety Element of the *General Plan* contains maps that indicate areas in which one or more geologic hazards exist.¹³ Map 2 in the Community Safety Element shows that the project site is subject to heavy ground shaking intensity from a RM 7.1 earthquake on the peninsula segment of the San Andreas Fault. Map 3 in the Community Safety Element shows that the project site is subject to moderate ground shaking intensity from a RM 7.1 earthquake on the northern segment of the Hayward fault.

The soils at the site consist mainly of fine- to medium-grained sand intermixed with some gravels, clay materials, and brick fragments.¹⁴ The project area is underlain by the Franciscan Assemblage, a sandstone, and shale bedrock complex of ancient ocean floor materials compressed and uplifted along the central and northern California coast.¹⁵ Deep bedrock at the site may contain material from the Fort Point-Potrero Hill-Hunters Point Shear Zone to the

¹³ “Community Safety Element,” *San Francisco General Plan*, City and County of San Francisco, April 1997.

¹⁴ *Updated Phase 2 Subsurface Investigation Report, 72 Townsend Street, San Francisco, California*, SCA Project No. X-4294, SCA Environmental, Inc., September 2000.

¹⁵ *Final Rincon Point-South Beach Redevelopment Plan Supplemental Environmental Impact Report*, State Clearinghouse No. 91023033, Planning Department, City and County of San Francisco and San Francisco Redevelopment Agency, certified August 15, 1991.

Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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southwest of the site, an area where ancient tectonic movement folded and crushed the rocks of the Franciscan Assemblage into a relatively compact mass.

The site was at or immediately adjacent to the historical 1850s San Francisco shoreline, then was subsequently filled with sand from nearby hills that were leveled between the 1860s and 1880s and used to extend the shoreline eastward. The fill extends several feet below current grade. Along Colin P. Kelly, Jr. Street, street grade slopes from about 17 feet at the northern end of the project building to 13 feet at the southeast corner of the building.¹⁶ Townsend Street also slopes down to the east and the elevation drops from approximately 16 feet at the western edge of the site to 13 feet at the southeast corner. Groundwater was encountered in test borings at a depth of 12 feet below the ground surface.¹⁷

Any groundwater encountered during construction of the proposed project would be subject to requirements of the City's Industrial Waste Ordinance (Ordinance Number 199-77), requiring that groundwater meet specified water quality standards before it may be discharged into the sewer system. The Bureau of Environmental Regulation and Management ("BERM") of the San Francisco Public Utilities Commission ("SFPUC") must be notified of projects necessitating dewatering, and may require groundwater analysis before discharge. Potential degradation of groundwater quality as a result of dewatering during project construction would be reduced to a less than significant level through BERM requirement for retention of groundwater pumped from the project site in a holding tank, and analysis of the quality of this groundwater before it is discharged to the combined sanitary and storm drain sewer system.

Should dewatering be necessary, the final foundation study for the project would address the potential settlement and subsidence impacts of this dewatering. The report would contain a determination as to whether or not a lateral movement and settlement survey should be done to monitor any movement or settlement of surrounding buildings and adjacent streets. If a monitoring survey is recommended, the Department of Public Works would require that a Special Inspector (as defined in Article 3 of the Building Code) be retained by the project sponsor to perform this monitoring. Groundwater observation wells would be installed to monitor potential settlement and subsidence. If, in the judgment of the Special Inspector, unacceptable movement were to occur during dewatering, groundwater recharge would be used to halt this settlement. Construction would be delayed, if necessary. Costs for the survey and any necessary repairs to service lines under the street would be borne by the project sponsor.

Although a strong seismic event could seriously damage the proposed project and put its occupants at risk, with proper site preparation, structural design, and construction techniques in accordance with the San Francisco Building Code, the project would enable the project structures

¹⁶ All elevations are referenced to San Francisco City Datum (mean sea level).

¹⁷ *Geotechnical Investigation, 72 Townsend Street, San Francisco, California*, Treadwell & Rollo, February 26, 1999.

Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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to withstand the maximum probable ground shaking at the site. Because the project site is located in an area of liquefaction potential, in a Seismic Hazards Study Zone designated by the California Division of Mines and Geology, the Department of Building Inspection (“DBI”) will, in its review of the building permit application, require the project sponsor to prepare a geotechnical report pursuant to the State Seismic Hazards Mapping Act. The report would assess the nature and severity of the hazard(s) on the site and recommend project design and construction features that would reduce the hazards(s). To ensure compliance with all San Francisco Building Code provisions regarding structural safety, when DBI reviews the geotechnical report and building plans for a proposed project, it will determine necessary engineering and design features for the project to reduce potential damage to structures from ground shaking and liquefaction. Therefore, potential damage to structures from geologic hazards on a project site would be mitigated through the DBI requirement for a geotechnical report and review of the building permit application pursuant to its implementation of the Building Code.

iii) *Seismic-related ground failure, including liquefaction?*

Explanation: Map 4 in the Community Safety Element of the *General Plan* shows that the project site is in an area of liquefaction potential. As noted in Section VI(a)(ii), preparation of a geotechnical report, incorporation of appropriate structural design features into the project, and compliance with the Building Code would function as mitigation for potential liquefaction and other seismic-related ground failure impacts.

iv) *Landslides?*

Explanation: The project site is located in a generally level area that is fully developed with buildings and other impervious surfaces. There is no potential for landslides at the site, as confirmed by Map 5 in the Community Safety Element of the *General Plan*.

b) *Result in substantial soil erosion or the loss of topsoil?*

Explanation: The project site is currently covered by impervious surfaces. Site drainage would continue to drain to the City's combined storm and sanitary sewer system and would be treated to the standards contained in the City's National Pollutant Discharge Elimination System Permit. The foundation and below-grade portions of the building would be water tight to avoid the need to permanently pump and discharge water. Stormwater runoff from upstream of the site would

Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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be collected along Townsend and Colin P. Kelly, Jr. Streets and would discharge into the city storm drain system. During construction, requirements to reduce erosion would be implemented pursuant to *California Building Code* Chapter 33, Excavation and Grading. During project operations, the project would comply with all local discharge requirements. Compliance with these requirements would mitigate potential soil erosion impacts during construction of the proposed project.

- c) *Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?*
- | | | | |
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Explanation: See Section VI(a)(ii).

- d) *Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?*
- | | | | |
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| <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
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Explanation: The geotechnical study that would be required by the DBI would characterize the site soils and evaluate the potential for expansive soils on the site. As discussed in Section VI(a)(ii), compliance with the design recommendations contained in the geotechnical report, as approved by DBI, would ensure that they project would not create a substantial risk to life or property as a result of expansive soils on the site.

- e) *Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?*
- | | | | |
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| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
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Explanation: The project's wastewater would be discharged into the City's combined sewer and stormwater drainage system and conveyed to the wastewater treatment plant for treatment. No septic systems or other alternative wastewater disposal systems would be required for the project.

VII. HAZARDS AND HAZARDOUS MATERIALS — *Would the project:*

- a) *Create a significant hazard to the public or the environment through the routine transport, use, or*
- | | | | |
|--------------------------|--------------------------|-------------------------------------|--------------------------|
| <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
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disposal of hazardous materials?

Explanation: The proposed project would not involve the routine transport, use, or disposal of hazardous materials. Residential and commercial occupants of the site would be expected to store and use small containerized quantities of hazardous household cleaning products and similar small-quantity chemicals found in homes and small businesses. This type of usage is typical of all residential and neighborhood retail development, and would not constitute a significant hazard to the public or the environment.

- b) *Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?*
- | | | | |
|--------------------------|-------------------------------------|--------------------------|--------------------------|
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
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Explanation:

Soil Contamination

A Phase 2 Subsurface Investigation was conducted in 2000 at the project property, in accordance with Article 22A of San Francisco’s Maher Ordinance, which requires subsurface soil sampling and testing prior to construction of projects located along the approximate San Francisco Bay shoreline as it existed in 1871 and requiring more than 50 cubic yards of excavation.¹⁸ According to an 1887 Sanborn Fire Insurance Map, the site’s southeast corner was less than 50 feet from the shoreline at that time.

Six soil borings were drilled to depths of 4 feet as part of an initial screening study to characterize the site soils. Composite soil samples were collected from multiple depths in each boring and subjected to laboratory analysis for asbestos, lead, petroleum hydrocarbons (gasoline, diesel, and motor oil range), BTEX (benzene, toluene, xylene, and ethylbenzene), semi-volatile and volatile organic compounds (“VOCs”), methyl tertiary-butyl ether (“MTBE”), polynuclear aromatic hydrocarbons (“PAHs”), polychlorinated biphenyls (“PCBs”), and 17 California Assessment Metals. The samples were also tested for hazardous waste characteristics, including toxicity, ignitability, reactivity, and corrosivity (TIRC).

Twelve additional follow-up borings were subsequently advanced to depths of 2 to 3 feet and also subjected to analysis. Two samples were collected from each of these borings: one from fill located above the old brick and asphalt roadway that pre-dated the warehouse, but below the concrete slab building foundation, and one from fill below the roadway used to fill San Francisco Bay, probably laid down in the 1860s or 1870s. A third round of boring samples were collected,

¹⁸ *Updated Phase 2 Subsurface Investigation Report.*

Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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four from along the interior of each perimeter wall of the warehouse (to depths of 4 to 7 feet) and another four from the interior of the building (to depths of 1 to 4 feet). The sample analyses from all three sets of samples were performed by certified laboratories in accordance with applicable U.S. Environmental Protection Agency (“EPA”) or (in the case of asbestos) California Air Resources Board methodologies.

No asbestos or VOCs were detected in any of the samples analyzed, and BTEX, MTBE, and PCBs were below reporting limits in all samples. Low levels of total petroleum hydrocarbons in the form of diesel (“TPH-D”) and motor oil (“TPH-MO”) were detected in two of the perimeter samples. A sample from adjacent to the western wall had a TPH-D concentration of 2.9 milligrams per kilogram (mg/kg) and a TPH-MO concentration of 8.1 mg/kg, while a sample from the southeastern corner had a TPH-D concentration of 2.5 mg/kg. These concentrations are below regulatory limits, and no evidence of a petroleum release was found at the site.

The following PAHs were above detection limits in one or more soil samples: anthracene (1.76 mg/kg), benzo(a)anthracene (3.22 mg/kg), benzo(b)fluoranthene (3.24 mg/kg), benzo(k)fluoranthene (1.29 mg/kg), benzo(a)pyrene (2.49 mg/kg), chrysene (3.07 mg/kg), fluoranthene (7.25 mg/kg), indeno(1,2,3-cd)pyrene (3.0 mg/kg), phenanthrene (3.22 mg/kg), and pyrene (5.17 mg/kg). The Phase 2 report noted that these compounds are common in fill soils in San Francisco, and may result from a variety of sources, such as combustion products, pottery, ceramics, manufacturing byproducts, etc. Although a mitigation plan was not deemed warranted for the soils with these constituents, their proper handling and disposal would be addressed by the Site Mitigation Plan that would be required for lead contamination, as discussed below.

Analysis for the 17 California Assessment Metals was performed on a composite sample from the first six borings and samples from the four perimeter borings. Although the metals concentrations were generally below the relevant hazardous waste standards, concentrations of the following metals were above detection levels: arsenic, mercury, barium, chromium, cobalt, copper, lead, nickel, silver, vanadium, and zinc. Each of the ten interior samples was also tested for lead, with resulting total lead concentrations ranging from 27 to 900 mg/kg. Six of the samples had concentrations in excess of 50 mg/kg.

To further characterize the lead concentrations for purposes of waste disposal, separate samples were analyzed from the newer shallow fill under the concrete slab but above the old brick and asphalt roadway and from the older, deeper fill below the roadway. The older fill had low total lead concentrations, ranging from 13 to 95 mg/kg, and low WET lead concentrations, ranging from 0.37 to 4.2 milligrams per liter (mg/L). The newer fill had higher concentrations, with two of four samples meeting the regulatory threshold for hazardous waste — 5 mg/L for WET lead. Total lead concentrations ranged from 46 to 93 mg/kg, while WET lead concentrations were between 4.0 and 7.8 mg/L.

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While most pesticides tested below laboratory reporting levels, two of them — 4,4'-DDT and Endrin — were measured at concentrations of 0.054 and 0.020 mg/kg, respectively. Since production of these pesticides did not occur until the 20th century, their presence in the soils underlying the 19th-century building is anomalous. The Phase 2 report speculated that pesticides may have been used inside the warehouse to protect food products from infestation, and that the materials may have leaked through cracks in the floor slab to the underlying soils. While these soils do not require disposal as hazardous waste, they should not be used in landscaped or play areas where there would be potential for exposure to humans.

None of the soil samples indicated hazardous TIRC characteristics. Although preliminary results from one laboratory had indicated ignitability, with flashpoints of 30 degrees Celsius, the results were not consistent with the other findings of the Phase 2 study. The samples were subjected to retesting by another laboratory, which found that the samples did not show ignitability below 100 degrees Celsius. The Phase 2 report concluded that the original results reflected an analytical error.

To establish appropriate handling and disposal procedures for the lead-contaminated soil in the newer shallow fill, a Site Mitigation Plan was prepared for approval by the San Francisco Department of Public Health (Environmental Health Division, Bureau of Toxics).¹⁹ Successful implementation of Mitigation Measures HM-1 through HM-5, set forth below, would ensure that potential impacts related to lead or other hazardous materials would be less than significant. However, site remediation measures in themselves could have impacts. During site remediation, workers, and possibly the public, could be exposed to chemical compounds in the soil, soil gases, or groundwater. The public and the environment could be exposed to airborne chemical compounds migrating from a site under remediation. Accidents during transportation of contaminated soils and/or groundwater could lead to exposure of the public and the environment to the chemical compounds. Potential impacts of remediation would be mitigated, in part, by legally required safety and hazardous waste handling and transportation precautions. These measures, along with application of clean-up standards, would serve to protect human health and the environment during site remediation, thus minimizing remediation impacts to a less than significant level.

Mitigation Measure HM-1: All contaminated soils designated as hazardous waste shall be excavated by a qualified Removal Contractor and disposed of at a regulated Class I hazardous waste landfill in accordance with EPA regulations, as stipulated in the Site Mitigation Plan. The Removal Contractor shall obtain, complete, and sign hazardous waste manifests to accompany the soils to the disposal site. Other excavated soils shall be disposed of in an appropriate landfill, as governed by applicable laws and

¹⁹ *Site Mitigation Plan, 72 Townsend Street, San Francisco, California*, SCA Project No. X4256.AS, SCA Environmental, Inc., August 2000.

Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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regulations, or other appropriate actions shall be taken in coordination with the San Francisco Department of Public Health (“DPH”).

A Site Health and Safety (“H&S”) Plan would be required by the California Division of Occupational Safety and Health (“Cal-OSHA”) prior to initiating any earth-moving activities at the site. The H&S Plan shall identify protocols for managing soils during construction to minimize worker and public exposure to contaminated soils. The protocols shall include at a minimum:

- Sweeping of adjacent public streets daily (with water sweepers) if any visible soil material is carried onto the streets.
- Characterization of excavated native soils proposed for use on site prior to placement to confirm that the soil meets appropriate standards.
- The dust controls specified in Air Quality Mitigation Measure AQ-1.
- Protocols for managing stockpiled and excavated soils.

The H&S Plan shall identify site access controls to be implemented from the time of surface disruption through the completion of earthwork construction. The protocols shall include as a minimum:

- Appropriate site security to prevent unauthorized pedestrian/vehicular entry, such as fencing or other barrier or sufficient height and structural integrity to prevent entry and based upon the degree of control required.
- Posting of “no trespassing” signs.
- Providing on-site meetings with construction workers to inform them about security measures and reporting/contingency procedures.

If groundwater contamination is identified, the H&S Plan shall identify protocols for managing groundwater during construction to minimize worker and public exposure to contaminated groundwater. The protocols shall include procedures to prevent unacceptable migration of contamination from defined plumes during dewatering.

The H&S Plan shall include a requirement that construction personnel be trained to recognize potential hazards associated with underground features that could contain hazardous substances, previously unidentified contamination, or buried hazardous debris. Excavation personnel shall also be required to wash hands and face before eating, smoking, and drinking.

The H&S Plan shall include procedures for implementing a contingency plan, including appropriate notification and control procedures, in the event unanticipated subsurface hazards are discovered during construction. Control procedures could include, but would

Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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not be limited to, investigation and removal of underground storage tanks or other hazards.

Mitigation Measure HM-2: All trucks and excavation and soil handling equipment shall be decontaminated following use and prior to removal from the site. Gross contamination shall be first removed through brushing, wiping, or dry brooming. The vehicle or equipment shall then be washed clean (including tires). Prior to removal from the work site, all vehicles and equipment shall be inspected to ensure that contamination has been removed.

Mitigation Measure HM-3: The following procedures shall be observed when handling, hauling, and disposing of contaminated soils:

- (a) Specific work practices: The construction contractor shall be alert for the presence of hazardous soils during excavation and other construction activities on the site (detected through soil odor, color, and texture and results of on-site soil testing), and shall be prepared to handle, profile (i.e., characterize), and dispose of such soils appropriately (i.e., as dictated by local, State, and federal regulations) when such soils are encountered on the site. If there are excavated materials containing over one percent friable asbestos, they would be treated as hazardous waste, and would be transported and disposed of in accordance with applicable State and federal regulations. These procedures are intended to mitigate any potential health risks related to chrysotile asbestos, which may or may not be located on the site.
- (b) Dust suppression: Soils exposed during excavation for site preparation and project construction activities shall be kept moist throughout the time they are exposed, both during and after work hours.
- (c) Air monitoring: Air monitoring of ambient air and, as necessary, for worker exposure, shall be performed to ensure compliance with all federal, State, and local regulations and exposure requirements.
- (c) Surface water runoff control: Where soils are stockpiled, visqueen shall be used to create an impermeable liner, both beneath and on top of the soils, with a berm to contain any potential surface water runoff from the soil stockpiles during inclement weather.
- (d) Soils replacement: If necessary, clean fill or other suitable material(s) shall be used to bring portions of the project site, where contaminated soils have been excavated and removed, up to construction grade.
- (e) Hauling and disposal: Contaminated soils shall be hauled off the project site by waste hauling trucks appropriately certified with the State of California and adequately covered to prevent dispersion of the soils during transit, and shall be

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disposed of at a permitted hazardous waste disposal facility registered with the State of California.

Mitigation Measure HM-4: After excavation and foundation construction activities are completed, the project sponsor shall prepare and submit a Closure/Certification Report to DPH for review and approval. The Closure/Certification Report shall include the mitigation measures in the SMP for handling and removing contaminated soils from the project site, whether the construction contractor modified any of these mitigation measures, and how and why the construction contractor modified those mitigation measures.

Mitigation Measure HM-5: If excavation work at the exterior of the project building is planned, such as for utility trenches, additional sampling of soils at these exterior locations shall be performed, as directed by DPH.

Asbestos

An asbestos survey of the existing building on the project site was surveyed on May 25, 2000 and July 17, 2000.²⁰ Samples were collected from the black roofing felt and tar, roof flashing, exterior textured paint over stucco, and gray/black putty and caulking on the skylights, and were subjected to laboratory analysis for asbestos fibers using polarized light microscopy. Asbestos-containing building materials (“ACBM”) are defined as building materials containing more than 1 percent asbestos. A concentration of 2 to 5 percent Chrysotile asbestos was detected in the mastic roof flashing, while concentrations of 10 to 20 percent Chrysotile asbestos were encountered in the skylight caulking.

Section 19827.5 of the California Health and Safety Code, adopted January 1, 1991, requires that local agencies not issue demolition or alteration permits until an applicant has demonstrated compliance with notification requirements under applicable Federal regulations regarding hazardous air pollutants, including asbestos. The BAAQMD is vested by the California legislature with authority to regulate airborne pollutants, including asbestos, through both inspection and law enforcement, and is to be notified ten days in advance of any proposed demolition or abatement work.

Notification includes the names and addresses of operations and persons responsible; description and location of the structure to be demolished/altered including size, age and prior use, and the approximate amount of friable asbestos; scheduled starting and completion dates of demolition or abatement; nature of planned work and methods to be employed; procedures to be employed to meet BAAQMD requirements; and the name and location of the waste disposal site to be used.

²⁰ *Asbestos Sampling Results, 72 Townsend Street, San Francisco, California*, SCA Project No. B-4197, SCA Environmental, Inc., revised August 14, 2000.

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The BAAQMD randomly inspects asbestos removal operations. In addition, the BAAQMD will inspect any removal operation concerning which a complaint has been received.

The local office of Cal-OSHA must be notified of asbestos abatement to be carried out. Asbestos abatement contractors must follow state regulations contained in 8CCR1529 and 8CCR341.6 through 341.14 where there is asbestos-related work involving 100 sq. ft. or more of asbestos containing material. At the 72 Townsend Street site, approximately 2,400 sq. ft. of roof flashing and approximately 960 sq. ft. of skylight caulking are ACBM.

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

These regulations and procedures, already established as a part of the permit review process, would insure that any potential impacts due to asbestos would be reduced to a less than significant level. The presence of asbestos on the project site would not be considered a potentially significant impact.

Lead-based Paint

The project building was surveyed for lead-based paint (“LBP”) on March 22, 1999 by a Certified Asbestos Consultant.²¹ Twenty-four paint samples were collected from throughout the building’s interior and exterior, including paint from brick, wood, sheetrock, and stucco walls; wood structural members; woodwork; and concrete floors. Laboratory-analyzed lead concentrations in the samples were measured using atomic absorption spectroscopy. The concentrations ranged from less than 100 ppm to 81,651 ppm.

The federal Occupational Safety and Health Administration and Cal-OSHA define LBP as paint containing lead concentrations of 600 ppm or greater. Standards set by the DHS, the EPA, and the U.S. Department of Housing and Urban Development (“HUD”) establish a higher threshold for LBP of 5,000 ppm or greater. However, when *any detectable lead* will be disturbed by a “trigger activity,” the work is subject to Cal-OSHA regulations for protecting worker safety. Trigger activities include: manual demolition, scraping, sanding, heat gun use, use of HEPA or non-HEPA equipment, rivet busting, abrasive blasting, welding, torch cutting, clean-up of dry abrasive blast residue, etc. Employers are required by law to ensure that employees are not

²¹ *Lead Survey and Evaluation Conducted at 64–72 Townsend Street, 52 Kelly Street, 2500 Eighteenth Street, San Francisco, California*, ProTech Consulting and Engineering, March 1999.

Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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exposed to airborne lead levels that exceed the permissible exposure limit of 50 micrograms per cubic meter of air over an 8-hour time-weighted average. In addition to the Cal-OSHA requirements that would apply to the proposed project, the project would be subject to the San Francisco requirements described below.

The demolition work that would be part of the proposed project must comply with Chapter 36 of the San Francisco Building Code, Work Practices for Exterior Lead-Based Paint. Where there is any work that may disturb or remove lead paint on the exterior of any building built prior to December 31, 1978, Chapter 36 requires specific notification and work standards, and identifies prohibited work methods and penalties.

Chapter 36 applies to buildings or steel structures on which original construction was completed prior to 1979 (which are assumed to have LBP on their surfaces), where more than ten total sq. ft. of LBP would be disturbed or removed. The ordinance contains performance standards, including establishment of containment barriers, at least as effective at protecting human health and the environment as those in the HUD Guidelines (the most recent Guidelines for Evaluation and Control of LBP Hazards) and identifies prohibited practices that may not be used in disturbance or removal of LBP. Any person performing work subject to the ordinance shall make all reasonable efforts to prevent migration of lead paint contaminants beyond containment barriers during the course of the work, and any person performing regulated work shall make all reasonable efforts to remove all visible lead paint contaminants from all regulated areas of the property prior to completion of the work.

The ordinance also includes notification requirements, contents of notice, and requirements for signs. Notification includes notifying bidders for the work of any paint-inspection reports verifying the presence or absence of LBP in the regulated area of the proposed project. Prior to commencement of work, the responsible party must provide written notice to the DBI Director of the location of the project; the nature and approximate square footage of the painted surface being disturbed and/or removed; anticipated job start and completion dates for the work; whether the responsible party has reason to know or presume that LBP is present; whether the building is residential or nonresidential, owner-occupied or rental property; approximate number of dwelling units, if any; the dates by which the responsible party has or will fulfill any tenant or adjacent property notification requirements; and the name, address, telephone number, and pager number of the party who will perform the work. (Further notice requirements include Sign When Containment is Required, Notice by Landlord, Required Notice to Tenants, Availability of Pamphlet related to protection from lead in the home, Notice by Contractor, Early Commencement of Work [by Owner, Requested by Tenant], and Notice of Lead Contaminated Dust or Soil, if applicable.) The ordinance contains provisions regarding inspection and sampling for compliance by DBI, and enforcement, and describes penalties for non-compliance with the requirements of the ordinance.

Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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These regulations and procedures established in the San Francisco Building Code would ensure that potential impacts of demolition, due to LBP, would be reduced to a less than significant level. The presence of lead paint on the project site would not be considered a potentially significant impact.

- c) *Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?*
- | | | | |
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Explanation: The nearest school to the project site is Bessie Carmichael Elementary School at 55 Sherman Street, which is nearly 1 mile from the project site. Due to this distance, there is no potential for the project to adversely affect the school.

- d) *Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?*
- | | | | |
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Explanation: As described in detail in Section VII(b), above, there is lead contamination in the soils underlying the site. While only limited excavation would occur at the site for foundation footings, mitigation measures have been identified to ensure that the excavation, handling, and disposal of soils will not create a significant hazard to workers, the public, or the environment. There are no hazardous materials sites or hazardous conditions nearby with the potential to affect project workers or occupants.

- e) *For a project within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?*
- | | | | |
|--------------------------|--------------------------|--------------------------|-------------------------------------|
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
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Explanation: There would not be any significant effect caused by the proposed project, because the nearest public use airports are San Francisco International Airport and Oakland International Airport, both located about 9 miles (southwest and southeast, respectively) from the project site.

Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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- f) *For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?*

Explanation: There would not be any significant effect caused by the proposed project, because there are no private airstrips in the vicinity of the project.

- g) *Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?*

Explanation: No interference with emergency response plans or emergency excavation plans is expected. The project sponsor would develop an evacuation and emergency response plan in consultation with the Mayor's Office of Emergency Services to ensure coordination between San Francisco's emergency planning activities and the project sponsor's plan to provide for building occupants in the event of an emergency. The project's sponsor's plan would be reviewed by the Office of Emergency Services and implemented before the Department of Public Works issues final building permits. Occupants of the proposed building would contribute to congestion if an emergency evacuation of the South of Market area were required. Section 12.202(e)(1) of the *San Francisco Fire Code* requires that all owners of high-rise buildings (over 75 feet) "shall establish or cause to be established procedures to be followed in case of fire or other emergencies. All such procedures shall be reviewed and approved by the chief of division." Additionally, project construction would have to conform to the provisions of the Building and Fire Codes which require additional life-safety protections for high-rise buildings.

- h) *Expose people or structures to significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?*

Explanation: There are no wildlands near the project site or in the South Beach Subarea. San Francisco ensures fire safety primarily through provisions of the Building Code and the Fire Code. Existing buildings are required to meet standards contained in these codes. In addition, the final building plans for any new residential project greater than two units are reviewed by the San Francisco Fire Department (as well as the DBI), in order to ensure conformance with these provisions. The proposed project would conform to these standards, including development of an emergency procedure manual and an exit drill plan. In this way, potential fire hazards (including those associated with hillside development, hydrant water pressure, and emergency access) would be mitigated during the permit review process.

Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

VIII. HYDROLOGY AND WATER QUALITY — *Would the project:*

- a) *Violate any water quality standards or waste discharge requirements?*

Explanation: The project site is served by San Francisco's combined sewer system, which handles both sewage and stormwater runoff. Wastewater treatment for the east side of the city is provided primarily by the Southeast Water Pollution Control Plant ("Southeast Plant").

No major new sewer construction would be needed to serve the proposed project. The project would meet any wastewater pre-treatment requirements of the SFPUC, as required by the San Francisco Industrial Waste Ordinance.²² The project would have little effect on the total wastewater volume discharged through the combined sewer system, particularly since stormwater runoff contributes greatly to the total flow and most or all of the site is already covered by a building (maximizing stormwater flows). Accordingly, the proposed project would not violate any water quality standards or waste discharge requirements.

- b) *Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level that would not support existing land uses or planned uses for which permits have been granted)?*

Explanation: Groundwater is approximately 13 feet below the surface. The proposed project, therefore, would not affect groundwater supplies or interfere with any groundwater recharge.

- c) *Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?*

²² Ordinance No. 19-92, San Francisco Municipal Code (Public Works), Part II, Chapter X, Article 4.1 (amended), City and County of San Francisco, January 13, 1992.

Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Explanation: The site is currently covered by an impervious surface and would not alter the existing drainage pattern of the area.

- d) *Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?*
- | | | | |
|--------------------------|--------------------------|--------------------------|-------------------------------------|
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|--------------------------|--------------------------|--------------------------|-------------------------------------|

Explanation: As described in Section VIII(c), the project would have no affect on the existing drainage pattern of the area. The amount of surface runoff may increase with the proposed project but not at a level that would result in flooding on- or off-site.

- e) *Create or contribute runoff water that would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff?*
- | | | | |
|--------------------------|--------------------------|--------------------------|-------------------------------------|
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|--------------------------|--------------------------|--------------------------|-------------------------------------|

Explanation: The project would have little effect on the total wastewater volume discharged through the combined sewer system, particularly since stormwater runoff contributes greatly to the total flow and most or all of the site is already covered by a building (maximizing stormwater flows).

- f) *Otherwise substantially degrade water quality?*
- | | | | |
|--------------------------|--------------------------|--------------------------|-------------------------------------|
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|--------------------------|--------------------------|--------------------------|-------------------------------------|

Explanation: As explained in Sections VIII(c) and VIII(e), the project would have minimal effect on wastewater volume discharged and would not affect the existing drainage pattern of the area and therefore, would not violate any water quality standards or waste discharge requirements.

- g) *Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?*
- | | | | |
|--------------------------|--------------------------|--------------------------|-------------------------------------|
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
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Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Explanation: The proposed residential level would be two-stories above grade. There is no 100-year flood hazard area near the project vicinity.

- h) *Place within a 100-year flood hazard area structures which would impede or redirect flood flows?*

Explanation: There is no 100-year flood hazard area near the proposed project.

- i) *Expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam?*

Explanation: The proposed project is not in a flood hazard area and therefore, project users and occupants would not be exposed to any flood dangers.

- j) *Inundation by seiche, tsunami, or mudflow?*

Explanation: The proposed project is not in a flood hazard area and therefore, would not be exposed to inundation by seiche, tsunami or mudflow.

IX. LAND USE AND PLANNING — *Would the project:*

- a) *Physically divide an established community?*

Explanation: The project site is in the South Beach Subarea, about one block west of the South Beach Harbor and The Embarcadero, one block north of Pacific Bell Park baseball stadium, and about four blocks south of Moscone Convention Center. China Basin is about three blocks south of the site and the Third Street Bridge crossing Mission Creek is about three blocks southwest of the site. The Bay Bridge is about two blocks north of the site. An on-ramp to the Bay Bridge is located at Bryant and Sterling Streets, about two blocks north of the project site.

Land uses in the vicinity of the project site consist primarily of residential uses to the east and south, including the 13-story, 414-unit South Beach Marina Apartments (at 2 Townsend Street) and the 14-story, 233-unit The Towers at Embarcadero South condominiums (at One Embarcadero South), and primarily office and commercial uses to the north and west.

Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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The site is on the southeast corner of Townsend and Colin P. Kelly Jr. Streets. Adjacent to the project site to the west and occupying the remainder of this block of Townsend Street is a five-story office building (88 Townsend Street) with vacant ground-floor retail space in the building's frontage on Second Street. This building has a two-story base with stucco façade, with three additional red-brick-clad stories set back from the base along Townsend Street and along half of the Second Street side. New dental offices for Paul Y. Lin, DDS, are under construction on the ground floor of this building at the Townsend Street frontage (82 Townsend Street).

Immediately north of the project building on Colin P. Kelly Jr. Street is a three-story brick office building (48 Colin P. Kelly Jr. Street) housing SOHA Engineers. The next building to the north is the rear of a four-story brick and stucco office building (625 Second Street) that has its frontage on the other side of the block on Second Street and which houses the companies looksmart, iwin, and rapt. The Colin P. Kelly Jr. Street side of this building has a private garage entrance. Continuing north, the last building in the block (275 Brannan Street) sits at the southwest corner of the intersection of Colin P. Kelly Jr. and Brannan Streets. This three-story cement block office building is currently vacant and available for lease. The project block is completed by the PS Public Storage building at 611 Second Street. This six-story brick building occupies the southeast corner of Brannan and Second Streets.

To the east across the street from the project site at the corner of Colin P. Kelly Jr. and Townsend Streets are the 13-story Building One and 7-story Building Two of the previously mentioned South Beach Marina Apartments. An adjacent (to the north) four-story cement parking garage provides parking for the residents of this building. To the north of this on Colin P. Kelly Jr. Street, the block is completed by The Brannan (243 Brannan), a complex of three 16- and 17-story towers housing apartments. A ground-floor retail space in the tower at the southeast corner of Colin P. Kelly Jr. and Brannan Streets is vacant and for lease.

Directly to the south of the project site, occupying the western half of the block bounded by Townsend Street, The Embarcadero, and Second Street, are the Towers at Embarcadero South (One Embarcadero), which consists of four stucco-clad towers of condominiums ranging from 6 to 14 stories. This development, completed in 2000, provides 233 condominium units and 7,000 sq. ft. of neighborhood-serving commercial space, including the Paragon Restaurant and Bar (701 Second Street), which occupies the ground floor at the corner of Townsend and Second Streets. The eastern half of this block is occupied by the Steamboat Point Apartments (49 Townsend Street and 800 The Embarcadero), a complex of four-story buildings housing 108 low-income residential units and 1,500 sq. ft. of commercial space, including the South Beach Café (800 The Embarcadero).

Land uses to the west of the project block, along the west side of Second Street, include a mix of commercial and office uses. A three-story cement building at the southwest corner of Townsend and Second Streets is occupied by the retailers Cycle Gear (700 Second Street) and West Marine (101 Townsend Street), as well as a variety of offices and an art gallery (Michael Martin

Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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Galleries). The San Francisco Fire Department Headquarters (698 Second Street) is located in a two-story cement building at the northwest corner of Townsend and Second Streets, which also houses Salt Water Pumping Station #1. Northward to Brannan Street, the remainder of the west side of this block of Second Street is occupied, respectively, by an apparently vacant three-story brick office building (680 Second Street), a six-story cement block office building (650 Second Street), a three-story cement block office building (640 Second Street), and a three-story brick office building (634 Second Street) housing Advent Software, Inc. At the corner (i.e., the southwest corner of Second and Brannan Streets) is a six-story brick office building (301 Brannan Street) housing offices for Advent Software and Photobition USA.

North of the project site, along the north side of Brannan Street are more office buildings and surface parking lots. The former Gallo Salame food processing facility at 250 Brannan Street, a Contributory building to the South End Historic District, is now occupied as offices. West of this building and opposite the northern terminus of Colin P. Kelly Jr. Street is a public surface parking lot operated by U.S. Parking, with a one-story cement office building occupied by XYZ Graphics (270 Brannan Street) set back from the street. Immediately west of the parking lot is a six-story cement block and stucco office building (274 Brannan Street), with the Brannan Street Café on the ground floor. A private surface parking lot is located on the adjacent parcel to the west, followed by a vacant three-story cement commercial building (599 Second Street) at the northeast corner of Brannan and Second Streets. Across Second Street from this building, at 300 Brannan Street, is a six-story cement office building, with the Jack Falstaff Restaurant occupying the ground floor.

The existing building on the project site is currently vacant, but most recently housed a restaurant, office space, and 13-car parking garage.

Land use impacts are considered to be significant if they disrupt or divide the physical arrangement of an established community, or if they have a substantial impact upon the existing character of the vicinity. The proposed project would change the land use from a vacant building to a more-intense multi-story residential building and parking garage, and would increase the density of population and the number of vehicles on the site. However, it would be similar in use to the existing high-rise residential development located adjacent and in proximity to the site. The proposed project with 74 units and 111-foot height would be smaller than the existing buildings across the street from the project site block (the South Beach Marina Apartments are about 130 feet high with 414 units, The Towers at Embarcadero South are about 140 feet with 233 units, and The Brannan towers are about 170 feet high with 336 units). The project would be consistent with the existing character of the immediate neighborhood, and would not physically divide or disrupt this community. Those surrounding uses and activities would continue on their own sites and would interrelate with each other as they do at present, and would not be substantially affected by the proposed new building uses at the site. The project's impacts on existing land uses would therefore be considered less than significant.

Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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- b) *Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to, the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?*
- | | | | |
|--------------------------|--------------------------|-------------------------------------|--------------------------|
| <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
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Explanation:

The project site is within the South Beach Subarea, and is designated for Commercial with Alternate Residential use. The project site is in the 40-105 foot height district in the *Design for Development* and in the 105-F Bulk District pursuant to Article 2.5 of the *Planning Code*. It is also in the South End Historic District. The site is adjacent to but outside of Waterfront Special Use District #3.

The proposed project would require review by the Agency for consistency with the *Redevelopment Plan*, the *Design for Development*, the *General Plan*, and other relevant planning documents. Permitted land uses are identified in the *Redevelopment Plan*. The *Redevelopment Plan* indicates that sites designated as Commercial with Alternate Residential use may be developed with housing, as well as commercial uses including but not limited to retail sales, professional offices, and eating and drinking establishments.

Although the *Redevelopment Plan* identifies an overall allowable density of 85 to 95 units per acre for all residential development within the South Beach Subarea, on an individual site the allowable density is a minimum of 40 units/acre and a maximum of 110 units/acre. The proposed project would have a density of about 110 units per acre.

The *Redevelopment Plan* establishes a height limitation of 40 to 105 feet for the project site, which is consistent with the City's 105-F Height and Bulk District. This district, established in Article 2.5 of the San Francisco Planning Code, governs the bulk requirements applicable to the project site. The Agency may grant height and density bonuses up to 15 percent of the height and density limits to projects providing low- and/or moderate-income housing. The project's proposed height of 93 feet would be consistent with the height limit for the site.

The *Redevelopment Plan* limits site coverage within the South Beach Subarea, stating that the percentage of land or parking podium that may be covered by residential buildings should not exceed 65 percent. Where open space will be provided on top of a parking podium, as is the case with the proposed project, the open space should be designed to provide easy pedestrian and visual transition from the sidewalk.

Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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The *General Plan*, which provides general policies and objectives to guide land use decisions, contains some policies that relate to physical environmental issues. Applicable area plans and elements of the *General Plan* include the *Northeastern Waterfront Plan*, the Urban Design Element, the Residence Element, and the Commerce and Industry Element.

In general, potential conflicts with the *General Plan* are considered by decision makers independently of the environmental review process, as part of the decision whether to approve or disapprove a proposed project. Any potential conflict not identified here could be considered in that context, and would not alter the physical environmental effects of the proposed project. If the project, on balance, were to have substantial conflicts with the *General Plan* objectives and policies, it could not be approved.

The *Redevelopment Plan* and the *Design for Development* governs permitted uses, densities, and the configuration of buildings within the project area. Permits to construct new buildings (or to alter or demolish existing ones) may not be issued unless either the proposed project conforms to the *Redevelopment Plan* and *Design for Development*, or an exception is granted pursuant to provisions of the *Redevelopment Plan* and *Design for Development*. In addition, due to its location within the South End Historic District and the designation of the existing building on the site as a Contributory structure, the project would be required to comply with Section III.A of the *Redevelopment Plan*.

- c) *Conflict with any applicable habitat conservation plan or natural community conservation plan?*

Explanation: The project site is located in a fully urbanized and built out neighborhood that contains no natural habitat. There is no habitat conservation plan or natural community conservation plan applicable to the site.

X. MINERAL RESOURCES —*Would the project:*

- a) *Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?*

Explanation: The Environmental Protection Element of the *General Plan* notes that there are no appreciable mineral deposits in the city. Accordingly, the proposed project would not affect mineral resources.

Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- b) *Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?*
- | | | | |
|--------------------------|--------------------------|--------------------------|-------------------------------------|
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
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Explanation: As noted in Section X(a), the *General Plan* specifically states that there are no significant mineral resources within the city, and omits additional discussion of minerals from the *General Plan* and area plans. The proposed project would have no effect on mineral resources.

XI. NOISE — *Would the project result in:*

- a) *Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?*
- | | | | |
|--------------------------|--------------------------|-------------------------------------|--------------------------|
| <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
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Explanation:

City of San Francisco Standards

The *General Plan* promulgates noise standards and policies in the Environmental Protection Element. Policy 11.1 discourages new uses in areas in which the ambient noise level exceeds the noise compatibility guidelines for that use. For all residential buildings, the noise compatibility guidelines establish a day/night average noise level of 65 decibels (dBA) as the upper limit for generally acceptable exterior noise environments.²³ In noise environments of 60 dBA or louder, new residential development should only proceed after a detailed analysis of the noise reduction requirements has been made, and appropriate noise insulation features have been incorporated into the project design.

To facilitate identification of the ambient noise level for a proposed development, the Environmental Protection Element provides maps delineating ambient sound zones and thoroughfare noise levels. The noise levels along Townsend and Brannan Streets are mapped at 70 dBA, while Second Street and The Embarcadero are mapped at 75 dBA. Although the corridor width of this sound level is not indicated, the map notes that the 70-dBA level corresponds to a typical passenger car traveling 25 miles per hour at a distance of 25 feet. The ambient noise level of the project site and surrounding area is mapped at 65 dBA. Policy 11.1

²³ dBA is a measure of sound in units of decibels (dB). The “A” denotes the A-weighted scale, which simulates the response of the human ear to various frequencies of sound.

Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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states that if the noise levels for the development site, as shown on the referenced maps, exceed the sound level guidelines established for that use in the land use compatibility chart, then either needed noise insulation features should be incorporated in the design or else the construction or development should not be undertaken. As discussed below, appropriate noise insulation features would be incorporated into the project building. The project would therefore not expose people to noise levels in excess of the standards established in the *General Plan*.

San Francisco also regulates noise via its Noise Ordinance. Article 29, Section 2909, limits noise from building operations, including mechanical equipment, such as air conditioning units and chillers. Substantial increases in the ambient noise level due to building equipment noise would not be anticipated. (Additional provisions of the Noise Ordinance are addressed below in Section XI(d)).

State of California Standards

Residential uses would be included in the proposed development. The noise insulation requirements of Title 24 of the California Code of Regulations apply to residential occupancies. Title 24 requires insulation sufficient to limit interior noise levels to 45 dBA or less at night. The DBI would review the final building plans to insure that the building wall and floor/ceiling assemblies meet State standards regarding sound transmission. Accordingly, the existing noise environment would not adversely affect occupant use.

- b) *Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?*

Explanation: The proposed building would be constructed on a spread-footing foundation, and therefore would not require pile driving. Other potential sources of groundborne noise and vibration, such as falling debris during removal of the existing roof or materials dropped during construction of the new building, would be isolated one-time events with little potential to generate excessive groundborne vibration or noise.

- c) *A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?*

Explanation: Ambient noise levels in the vicinity of the project site are typical of noise levels in urban San Francisco. The most significant existing source of noise at the project site, as throughout most of San Francisco, is vehicular traffic, including trucks, cars, buses, and emergency vehicles. Non-traffic noise sources in the area include baseball games at SBC Park, aircraft overflights, and temporary construction noise due to other projects in the vicinity. The

Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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nearest noise-sensitive receptors to the project site are residents, including those at the South Beach Marina Apartments (2 Townsend Street), Steamboat Point Apartments (49 Townsend), the Brannan apartment towers (243 Brannan), and the Towers at Embarcadero South (One Embarcadero South). Residences are also located on Brannan and First Streets, about one block north and east of the project site, respectively, and at The Embarcadero, about two blocks east of the project site.

Generally, traffic must double in volume in order to produce a noticeable increase (i.e., 3 dBA) in noise levels. Traffic volumes would not be expected to double as a result of the project; therefore, substantial increases in traffic noise levels would not be anticipated in the project area.²⁴

- d) *A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?*
- | | | | |
|--------------------------|--------------------------|-------------------------------------|--------------------------|
| <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|--------------------------|--------------------------|-------------------------------------|--------------------------|

Explanation: Project construction would increase noise levels in areas surrounding the project site. Construction noise levels would fluctuate depending on construction phase, equipment type and duration of use, distance between noise source and listener, and presence or absence of barriers between noise source and listener. Construction activities associated with the project construction potentially could include excavation and hauling, foundation construction, steel erection, and finishing. The buildings would probably have a spread-footing foundation; therefore pile driving would not be likely to occur. Construction activities would be temporary and intermittent and would occur at different times through the phases of project construction. Construction would extend for about ten months: approximately three weeks would be required for demolition, six weeks would be devoted to excavation, two months would be devoted to foundation work, and ten months would be devoted to erection and finishing, with some overlap between the different phases of work. The noisiest construction periods would be during demolition of the existing roof, excavation, and erection of the steel and concrete residential building. Throughout the construction period there would be truck traffic to and from the site, hauling away excavated materials, or delivering building materials. It is anticipated that the construction hours would be normal working hours during the week, with possible limited work during nights or weekends.

Noise impacts from construction activities could be reduced in three ways: reduce the sound level at the source, provide the receiver with shielding, or alter the path of sound transmission. Construction noise is regulated by the San Francisco Noise Ordinance (Article 29 of the Police Code). The ordinance requires that noise levels from individual pieces of construction equipment, other than impact tools, not exceed 80 dBA at a distance of 100 feet from the source.

²⁴ *Technical Noise Supplement*, California Department of Transportation, 1998.

Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Impact tools, such as jackhammers and impact wrenches, must have both intake and exhaust muffled to the satisfaction of the Director of Public Works. Section 2908 of the Ordinance prohibits construction work between 8:00 p.m. and 7:00 a.m., if noise would exceed the ambient noise level by 5 dBA at the project property line, unless a special permit is authorized by the Director of Public Works. The project demolition and construction operations would comply with the Noise Ordinance requirements. Compliance with the Noise Ordinance is required by law and would reduce any impacts to a less than significant level.

- e) *For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?*
- | | | | |
|--------------------------|--------------------------|--------------------------|-------------------------------------|
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|--------------------------|--------------------------|--------------------------|-------------------------------------|

Explanation: There is no public airport or public use airport within 2 miles of the project site and therefore, there are no airport-related noise effects that would be caused by the proposed project.

- f) *For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?*
- | | | | |
|--------------------------|--------------------------|--------------------------|-------------------------------------|
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
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Explanation: There is no private airstrip within 2 miles of the project site and therefore, there are no related noise effects that would be caused by the proposed project.

XII. POPULATION AND HOUSING — *Would the project:*

- a) *Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?*
- | | | | |
|--------------------------|--------------------------|-------------------------------------|--------------------------|
| <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
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Explanation: During the period of 1990-2000, the number of new housing units completed citywide ranged from a low of about 350 units (1993) to a high of about 2,100 units (1990) per year. The citywide annual average over that 11-year period was about 1,130 units.²⁵

²⁵ "Housing Element," *San Francisco General Plan*, City and County of San Francisco, February 2003, page 29.

Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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In March 2001, the Association of Bay Area Governments (“ABAG”) projected regional needs in the Regional Housing Needs Determination 1999-2006 allocation. The jurisdictional need of the City for 2006 was calculated as 20,370 dwelling units or an average yearly need of 2,546 net new dwelling units. The 74 units in the proposed project would help to satisfy this need.²⁶

Based on the 2000 U.S. Census household size of 1.47 persons per unit in the census tract in which the project site is located (Tract 179.01), the proposed 74 residential unit project would increase the area population by 109 people. Currently, there are no residential units on the site; substantial amounts of new residential units have been built over the past 15 years, including 233 condominium units at One Embarcadero South, 402 units at the former Oriental Warehouse, the 240-unit Brannan Square, 414-unit South Beach Marina Apartments, 108-unit Steamboat Point Apartments, 177-unit Delancey Street Foundation, and others.

While potentially noticeable to immediately adjacent neighbors, the increase in the number of residents on the project site would not substantially increase the area-wide population, and the resulting density would not exceed levels that are common and accepted in high-density urban areas such as San Francisco. Furthermore, as noted above, the proposed project would help the City meet its regional housing needs allocation.

A majority of the people living in the South Beach Subarea could conceivably be employed in Downtown San Francisco, and could easily walk to work from home. A large number of jobs are located within an eight-block radius of the project site. The project would therefore improve the jobs/housing balance in San Francisco, which serves to reduce regional traffic generation and the associated air emissions. The potential increase in population of 109 residents on the project site would not result in significant adverse population impacts.

- b) *Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?*

Explanation: There is no housing located on the project site and therefore, no housing would be displaced.

- c) *Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?*

²⁶ Ibid., page 1.

Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Explanation: The existing building on the project site is currently vacant. Therefore, no residents, workers, or other people would be displaced by the proposed project.

XIII. PUBLIC SERVICES: *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the following public services:*

a) *Fire protection?*

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Explanation: The San Francisco Fire Department would provide fire protection and emergency medical services to the proposed project. The first-response fire station serving the project would be Station No. 8, located at 36 Bluxome Street, approximately 0.6 mile (travel distance) west of the site. The second-response station would be Station No. 35 at Pier Twenty-Two and a Half on The Embarcadero at Harrison Street, also about 0.6 mile north of the site. The project site presently receives fire protection services, and the addition of approximately 109 residents and an increase in the height and square footage of the building on the site could slightly increase the demand for fire protection services in the area. Although the project could increase the number of calls received from the area or the level of regulatory oversight that must be provided as a result of the increased concentration of activity on site, the increase in responsibilities would not likely be substantial in light of the existing demand for fire protection services in the South of Market area. Furthermore, the increase in demand would not require the construction of any new fire prevention facilities, and thus would not result in an associated significant impact.

b) *Police protection?*

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Explanation: Police protection services would be provided to the proposed project by the San Francisco Police Department. The project site is located in the Southern District of the Metro Division, and is served by the South of Market District Station at 850 Bryant Street, on the first floor of the San Francisco Hall of Justice. Similar to fire protection, the project site presently receives police protection services, and the addition of approximately 109 residents could slightly increase the demand for police protection services in the area. Although the project could increase the number of calls received from the area, the increase would not be substantial in light of the existing demand for police protection services in the South of Market area, and would not require the construction of new facilities. The project's impact on police services would be less than significant.

Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

c) *Schools?*

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Explanation: The public school needs of the project would be served by the San Francisco Unified School District (“SFUSD”), which has a total enrollment of 57,144 pupils. The nearest elementary school is the newly constructed Bessie Carmichael Elementary School at 55 Sherman Street, the nearest middle school is the Enola Maxwell Middle School at 655 De Haro Street, and the closest high school is Mission High School at 3750 18th Street. The SFUSD is currently not a growth district, as illustrated by the declining enrollment at Maxwell Middle School, where the 2003/04 enrollment was 229 students, which had declined to 167 in the 2004/05 school year. Some but not all facilities throughout the City and County are generally underutilized, and the SFUSD currently has more classrooms district-wide than it needs.²⁷ However, the increase in number of charter schools, and the trend toward smaller schools, is anticipated to increase the demand for classroom space.²⁸ No construction of schools is planned near the project site, but the proposed project would be assessed \$1.72 per gross square foot of residential space. These funds could be used to rehabilitate underutilized schools to accommodate the additional students generated by the project. Therefore, the proposed project’s impact on school facilities would be less than significant.

d) *Parks?*

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Explanation: The nearest parks to the project site are South Beach Harbor Park, one block east of the site, and South Park, about 0.25 mile northwest of the site. In addition, shoreline open space is available via a promenade and bicycle route along The Embarcadero. More sizeable parks available to area residents include the 1,013-acre Golden Gate Park, about 3.6 miles west of the project site; 101-acre Glen Canyon Park, about 4 miles southwest of the site; and 317-acre McLaren Park, about 4.5 miles south of the site. The total amount of land dedicated to parks and open space uses in San Francisco totals approximately 4,090 acres, or 5.5 acres per 1,000 residents.

Although the amount of parkland in the South of Market area is limited due to the density of urban development and the lack of available land, a significant amount of public parks and open space is available to San Francisco residents in neighboring counties. The East Bay Regional Park District owns 65 regional parks, recreation areas, and wilderness areas in Alameda and Contra Costa counties. To the north of the city are the Golden Gate National Recreation Area

²⁷ *Facilities Master Plan*, San Francisco Unified School District, 2003.

²⁸ Telephone conversation, Sue Mook, Assistant to Chief Business Officer, Public Information Office, San Francisco Unified School District, March 23, 2004.

Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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and Point Reyes National Seashore in Marin County. In addition, State park and recreation areas are scattered throughout the region.

The Recreation and Open Space Element of the *General Plan* indicates that suitable distances to park facilities are 1/4 mile for neighborhood parks (1–10 acres), 3/8 mile for district parks (over 10 acres), and 1/2 mile for citywide parks (1–1,000 acres). Neighborhoods located within these distances of a park facility are considered to be within its service area. South Park and South Beach Harbor Park are both within a 5-minute walk of the project site; the project site would therefore be considered within their service area.

The additional demand for park services by residents of the proposed project would not require the provision of new park facilities or exceed the capacity of the existing parks in the area. In addition, the project would provide private and public open space consistent with City requirements for residential uses. The project’s impact on parks would therefore be less than significant.

e) *Other public facilities?*

Explanation: It is City policy to provide local multi-purpose neighborhood community centers to enhance the quality of life of citizens and provide a focus for community life.

The nearest community centers to the project site are the SOMA Eugene Friend Rec Center (270 Sixth Street), about 1.4 miles west of the site; Tenderloin Rec Center (570 Ellis Street), about 1.8 miles west of the site; and Boeddeker Park Clubhouse (295 Eddy Street), about 1.8 miles northwest of the site.

The project site is not located in a low-income neighborhood or in a neighborhood with a concentration of elderly residents, and the project would not be expected to disproportionately attract such residents. While some residents could avail themselves of services and programs available from the City’s community centers, any incremental demand could be accommodated by the existing centers listed above. The project would not require expansion of any other public facilities, and would not substantially affect existing facilities.

XIV. RECREATION —

a) *Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical*

Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

deterioration of the facility would occur or be accelerated?

Explanation: San Francisco has over 90 recreation facilities, including community swimming pools, clubhouses, golf courses, recreation centers, senior centers, day camps, and other facilities. The project would provide additional recreation facilities for use by the residents, including an indoor swimming pool and an exercise facility. The incremental demand on existing recreational facilities would be minimal. See Section XIII(d) for a discussion on parks.

- b) *Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?*

Explanation: The project includes the construction of an indoor swimming pool, hot tub, and exercise facility for use by project occupants. The potential impacts from the construction of these facilities are included in the impacts evaluated in this Initial Study associated with construction of the entire project, including noise and impacts on traffic and air quality, among others. No additional impacts would result from the construction of the project's recreational facilities.

XV. TRANSPORTATION/TRAFFIC — *Would the project:*

- a) *Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume-to-capacity ratio on roads, or congestion at intersections)?*

Explanation: The proposed project would include 74 dwelling units with 78 parking spaces in a two-level parking garage for residents. The increase in residents on the project site would result in increased demands on the local transportation system, including increased traffic, transit demand, and parking demand. Project effects related to transportation and circulation, including intersection operations, transit demand, and impacts on pedestrian circulation, parking, bicycles, and freight loading as well as construction impacts will need to be determined. The transportation analysis will also need to take into account the potential cumulative development occurring in the project vicinity.

Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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- b) *Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways?*
- | | | | |
|-------------------------------------|--------------------------|--------------------------|--------------------------|
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
|-------------------------------------|--------------------------|--------------------------|--------------------------|

Explanation: See Section XV(a).

- c) *Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?*
- | | | | |
|--------------------------|--------------------------|--------------------------|-------------------------------------|
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
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Explanation: The project site is not near any air traffic and therefore, the proposed residential mixed use project would have no potential to affect air traffic.

- d) *Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?*
- | | | | |
|-------------------------------------|--------------------------|--------------------------|--------------------------|
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
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Explanation: The project would not alter existing intersections or roadways or otherwise introduce potentially hazardous design features. However, onsite circulation and the proposed ingress/egress for the project will need to be evaluated, and potential impacts on traffic safety associated with these attributes of the project will need to be identified.

- e) *Result in inadequate emergency access?*
- | | | | |
|-------------------------------------|--------------------------|--------------------------|--------------------------|
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
|-------------------------------------|--------------------------|--------------------------|--------------------------|

Explanation: See Section XV(a). The transportation analysis will need to include a discussion on the adequacy of emergency access, including internal turning radii.

- f) *Result in inadequate parking capacity?*
- | | | | |
|-------------------------------------|--------------------------|--------------------------|--------------------------|
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
|-------------------------------------|--------------------------|--------------------------|--------------------------|

Explanation: See Section XV(a).

- g) *Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus*
- | | | | |
|-------------------------------------|--------------------------|--------------------------|--------------------------|
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
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Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

turnouts, bicycle racks)?

Explanation: See Section XV(a). The transportation analysis will need to include an evaluation of the proposed project’s consistency with adopted policies and plans related to alternative transportation.

XVI. UTILITIES AND SERVICE SYSTEMS — *Would the project:*

- a) *Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?*

Explanation: The project site is served by San Francisco's combined sewer system, which handles both sewage and storm water runoff. Operated by the SFPUC, the collection and treatment system consists of approximately 900 miles of underground pipes throughout the city and three wastewater treatment plants. During dry weather, the SFPUC treats and discharges approximately 84 million gallons per day (“mgd”) of treated wastewater to the San Francisco Bay and Pacific Ocean. With added operations at the North Point Wet Weather Treatment Facility, located on Bay Street, the City’s wet weather treatment capacity of combined wastewater and storm water is approximately 575 mgd. No major new sewer construction would be needed to serve the proposed project. Wastewater treatment for the east side of the city is provided primarily by the Southeast Plant, near Third Street and Jerrold Avenue. The project would meet wastewater pre-treatment requirements of the SFPUC, as required by the San Francisco Industrial Waste Ordinance.²⁹ The project would have little effect on the total wastewater volume discharged through the combined sewer system, particularly since storm water runoff contributes greatly to the total flow and the site is already developed (resulting in maximum storm water flows). The project would not result in a substantial increase in demand for wastewater treatment, and thus it would not result in an associated significant impact. Based on compliance with existing and future regulations and coordination with ongoing planning efforts to provide long-term water quality protection of the Bay, water quality impacts associated with changes in combined sewer overflow discharges to the Bay would be considered less than significant impacts.³⁰

- b) *Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?*

²⁹ Ordinance No. 19-92.

³⁰ *Rincon Hill Plan Draft EIR*, State Clearinghouse No. 1984061912, Planning Department, City and County of San Francisco, certified September 24, 2004, page 220.

Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Explanation: See Section XVI(a).

- c) *Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?*
- | | | | |
|--------------------------|--------------------------|-------------------------------------|--------------------------|
| <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|--------------------------|--------------------------|-------------------------------------|--------------------------|

Explanation: As discussed in Section XVI(a), the project site is served by a combined sewer and storm water drainage system that has adequate capacity to accommodate the project’s flows; no new construction of these facilities would be required. Furthermore, storm water runoff from the site would not be expected to increase because the site is already completely covered by impervious surfaces.

- d) *Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?*
- | | | | |
|--------------------------|--------------------------|-------------------------------------|--------------------------|
| <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
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Explanation: Water is provided to the site by the SFPUC, which supplies water from Hetch Hetchy Reservoir in the Sierra Nevada and local surface and groundwater supplies. Local surface water supplies include Crystal Springs Reservoir, San Andreas Reservoir, and Pilarcitos Reservoir, which capture local watershed runoff. In the East Bay, runoff from the Alameda Creek watershed is collected and stored in the Calaveras and San Antonio Reservoirs, forming another component of San Francisco’s water supply. In addition to storing local runoff, the San Andreas, San Antonio and Calaveras Reservoirs also provide storage of Hetch Hetchy water.

According to the SFPUC’s *Urban Water Management Plan (“UWMP”)*, total water use by SFPUC retail customers (including commercial, industrial, and residential users) is estimated to be 90 mgd.³¹ Wholesale customers consume another 267.4 mgd. Approximately 53 percent of the retail deliveries go to San Francisco’s residential customers, with about 40 percent of this residential water consumed by single-family homes, which comprise 34 percent of the total households in San Francisco, and the other 60 percent consumed by multi-family residential users.

The California Urban Water Management Act of 1983 (Water Code Sections 10610 – 10657) requires all urban water suppliers who provide water for municipal purposes to more than 3,000 customers or supply more than 3,000 acre-feet of water annually to prepare an *UWMP*, which

³¹ *Final Urban Water Management Plan for the City and County of San Francisco Public Utilities Commission, City and County of San Francisco Public Utilities Commission, February 2001.*

Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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must be updated every five years. San Francisco must update its *UWMP* and submit it to the California Department of Water Resources for review by December 31, 2005. The *UWMP* must describe and quantify the water supply sources and projected demand, identify demand management measures for implementation, and provide other information.

The San Francisco water demand forecasts presented in the current *UWMP* were based on models that were verified with historical water delivery records that included periods of drought. Projections through the year 2020 of water use by the SFPUC's retail customers incorporate anticipated changes in water use due to implementation of conservation programs and use of water-saving plumbing fixtures. The projections indicate that the SFPUC's retail water demand will only slightly increase by 2020, rising from approximately 90 mgd in 2000 to approximately 92 mgd by 2020. The forecasted water demands of the residential sector (both single-family and multi-family) are projected to be less than current demands.

Senate Bill 610 (Chapter 643, Statutes of 2001) requires a Water Supply Assessment ("WSA") for inclusion in any environmental documentation for certain projects subject to CEQA. The proposed project does not require preparation of a WSA because the 74 proposed dwelling units would be well below the 500-unit threshold for requiring preparation of a WSA.

According to the *UWMP*, current gross per capita water use within San Francisco is 112 gallons per capita per day ("gpcd"), with residential water use calculated to be approximately 61 gpcd. Based on this consumption rate, and with a projected population of 109 people (see Section XII(a)), the residential component of the project would be expected to consume about 6,649 gallons per day ("gpd"). The commercial component of the proposed project would add slightly to this demand; per capita residential water consumption is substantially higher than per capita use by employees in retail establishments. Because the project building is currently vacant, the project's water consumption would constitute new demand. The consumption of about 6,650 gpd represents about 0.00738 percent of current retail demand and about 0.00186 percent of total demand in the SFPUC's service area.

The proposed new construction would be designed to incorporate water-conserving measures, such as low-flush toilets and urinals, as required by the California State Building Code Section 402.0(c). The projected water consumption for the proposed project was assumed in the latest *UWMP*, which concluded that water supplies were adequate to accommodate San Francisco's projected growth.³² Therefore, an adequate water supply would be available for the project, and the project's water demand would be less than significant.

³² The SFPUC's *UWMP* update 2000 is based on the ABAG Year 2000 Projections, which include all known or expected development projects in San Francisco through the Year 2020.

Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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- e) *Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?*
- | | | | |
|--------------------------|--------------------------|-------------------------------------|--------------------------|
| <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
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Explanation: See Section XVI(a).

- f) *Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?*
- | | | | |
|--------------------------|--------------------------|-------------------------------------|--------------------------|
| <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
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Explanation: San Francisco's solid waste is disposed of at the Altamont Landfill. A substantial expansion of the landfill was approved in 1997 that will be able to accommodate San Francisco's solid waste stream well into the future. The solid waste associated with the project construction and operation would not substantially affect the projected life of the Altamont Landfill, and no associated impacts would occur.

- g) *Comply with federal, state, and local statutes and regulations related to solid waste?*
- | | | | |
|--------------------------|--------------------------|--------------------------|-------------------------------------|
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|--------------------------|--------------------------|--------------------------|-------------------------------------|

Explanation: Altamont Landfill closely regulated and is operated in compliance with all applicable solid waste regulations, including the California Integrated Waste Management Act of 1989 and the California Solid Waste Reuse and Recycling Access Act of 1991. The proposed project would be required to comply with all laws and regulations pertaining to solid waste.

XVII. MANDATORY FINDINGS OF SIGNIFICANCE —

- a) *Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?*
- | | | | |
|-------------------------------------|--------------------------|--------------------------|--------------------------|
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
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Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Explanation: As described in Section IV, the proposed project would not be expected to create any significant impacts on biological resources. Regarding cultural resources, Section V identifies a potentially significant impact to the existing building on the project site, former Hooper’s South End Grain Warehouse, which will need to be evaluated further. The building is a contributory structure in the South End Historic District. The district consists of a number of buildings, and therefore, would not be eliminated by the proposed project. However, as discussed in Section V(a) the potential effect of the project on historic resources is significant and adverse and will need to be evaluated further. Section V does include mitigation measures to lessen project effects on the historic building, along with measures to reduce possible adverse impacts on archaeological and paleontological resources to less than significant levels.

- b) *Does the project have impacts that are individually limited but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)*
- | | | | |
|-------------------------------------|--------------------------|--------------------------|--------------------------|
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
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Explanation: Project-related transportation effects will need to be evaluated, as discussed in Section XV, to determine the extent of the individual effects of the project, as well as potential cumulative effects in the project vicinity.

- c) *Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?*
- | | | | |
|-------------------------------------|--------------------------|--------------------------|--------------------------|
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
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Explanation: See Section XVII(a) and XVII(b).

XVIII. MITIGATION MEASURES—

The following mitigation measures have been identified in this document to reduce potentially significant impacts to less than significant levels:

Air Quality

Mitigation Measure AQ-1 would reduce the project's construction-related air quality impacts to a less-than-significant level.

Mitigation Measure AQ-1: The project applicant shall require the construction contractor to reduce the severity of project construction period dust impacts by complying with the following control measures:

- Water all active construction areas at least twice daily. Consistent with Ordinance 175-91, only non-potable water shall be used for all dust-control purposes. The construction contractor shall obtain reclaimed water from the City's Clean Water Program for this purpose.
- Cover all trucks hauling soil, sand, and other loose materials, or require all trucks to maintain at least 2 feet of freeboard.
- Pave, apply water two times daily, or apply non-toxic soil stabilizers on all unpaved access roads, parking areas, and staging areas at the construction site.
- Sweep daily (with water sweepers) all paved access roads, parking areas, and staging areas at the construction site.
- Sweep adjacent public streets daily (with water sweepers) if any visible soil material is carried onto the streets.
- Require construction contractors to (1) properly maintain construction equipment and vehicles in accordance with the manufacturers' recommendations, and (2) minimize idling time when equipment is not in use and when trucks are waiting in queues. Include these provisions in all construction contracts.

Cultural Resources

Mitigation Measure CR-5, would reduce the potentially significant disturbance, damage, or loss of archeological resources during project construction to a less than significant level.

Mitigation Measure CR-5: The following mitigation measure is required to avoid any potential adverse effect from the proposed project on accidentally discovered buried or submerged historical resources as defined in *CEQA Guidelines* Section 15064.5(a)(c), including human or associated funerary remains. The project sponsor shall retain the services of an archaeologist. During any soils disturbing activities within the project site, the archaeologist shall carry out a pre-excavation testing program to better determine the probability of finding archaeological remains on the site. The testing program shall consist

of a series of mechanical exploratory borings or trenches and/or other testing methods determined to be appropriate by the archaeologist.

If, after testing, the archaeologist determines that no further investigations or precautions are necessary to safeguard potentially significant archaeological resources, the archaeologist shall submit a written report to the City's Environmental Review Officer ("ERO"), with copies to the project sponsor and the Agency. If the archaeologist determines that further investigations or precautions are necessary, he/she shall consult with the ERO, and they shall jointly determine what additional procedures are necessary to minimize potential effects on archaeological resources.

These additional mitigation measures shall be implemented by the project sponsor and might include a program on on-site monitoring of any site excavation and foundation work that may be necessary, during which the archaeologist shall record observations in a permanent log. Whether or not there are archaeological finds of significance, the archaeologist shall prepare a written report on the monitoring program that shall be submitted first and directly to the ERO with copies to the project sponsor and Agency. During the monitoring program, the project sponsor shall designate one individual on site as his/her representative. This representative shall have the authority to suspend work at the site to give the archaeologist time to investigate and evaluate archaeological resources that may be encountered.

Should evidence of cultural resources of potential significance be found during the monitoring program, the archaeologist shall immediately notify the ERO, and the project sponsor shall halt any activities which the archaeologist and the ERO jointly determine could damage such cultural resources. Ground disturbing activities which might damage cultural resources would be suspended for a total maximum of four weeks over the course of construction.

After notifying the ERO, the archaeologist shall prepare a written report to be submitted first and directly to the EIR, with copies to the project sponsor and Agency, which shall contain an assessment of the potential significance of the archaeological finds and recommendations for what measures should be implemented to minimize potential effects on archaeological resources. Based on this report, the ERO shall recommend specific additional mitigation measures to be implemented by the project sponsor. These additional mitigation measures might include a site security program, additional on-site investigations by the archaeologist, and/or documentation, preservation and recovery of archival material.

Finally, the archaeologist shall prepare a report documenting the archaeological resources that were discovered, and evaluation as to their significance, and a description as to how any archaeological testing, exploration and/or recovery program was conducted.

Copies of all draft reports prepared according to this mitigation measure shall be sent first and directly to the ERO for review. Following approval by the ERO, copies of the final report shall be sent to the President of the Landmarks Preservation Advisory Board and the Northwest Information Center. Three copies of the final report shall be submitted to the

Office of Major Environmental Analysis, accompanied by copies of the transmittals documenting distribution to the President of the Landmarks Preservation Advisory Board and the Northwest Information Center.

Mitigation Measure CR-6 would reduce the potential impact on paleontological resources to a less than significant level:

Mitigation Measure CR-6: If any paleontological resources are encountered during site grading or other construction activities, all ground disturbance shall be halted until the services of a qualified paleontologist can be retained to identify and evaluate the resource(s) and, if necessary, recommend mitigation measures to document and prevent any significant adverse effects on the resource(s).

Mitigation Measures CR-1 to CR-4 would reduce the project's impact on historic resources; however, even with implementation of the mitigation measures, the *impact on historic resources would not be reduced to a less than significant level.*

Mitigation Measure CR-1: Remove the non-historic stucco finish. Prior to 1999, Hooper's South End Grain Warehouse was stuccoed, and experts disagreed about whether or not it was originally exposed brick or stucco. Further testing should be conducted, but the existing stucco is clearly non-historic and damaging to the building's character. If it is possible to remove it without damaging the brick below, removing it to expose the brick, or removing it and applying a stucco finish that more closely approximates an historic finish would offer one means of mitigating the effect posed by the residential addition.

Mitigation Measure CR-2: Decrease the level of fenestration on the Townsend Street facade. Through incremental change and the 1999 project, the Townsend Street facade has been drastically opened, losing the sense of enclosure that is characteristic of this warehouse type. By decreasing the size of openings and rebuilding some of the former wall, the proposed project could partially mitigate the impact of the construction of the new residential structure.

Mitigation Measure CR-3: Remove the non-historic chamfered corner and replace it with a storefront aligned with the streets.

Mitigation Measure CR-4: (1) Document the history and the existing exterior and interior conditions of Hooper's South End Grain Warehouse according to the *Historic American Buildings Survey* ("HABS") Level II documentation in addition to the other mitigation measures identified; and (2) install on-site displays communicating the historic significance of the building and the historical location of the shoreline.

- (1) According to HABS standards, Level II documentation consists of the following tasks:

- *Drawings:* Existing drawings, where available, should be photographed with large format negatives or photographically reproduced on mylar.
- *Photographs:* Photographs with large-format negatives should be shot of exterior and interior views or historic views where available. These should be printed on archival fiber paper.
- *Written data:* A report documenting the existing conditions and history of the building should be prepared.

The completed documentation package would be submitted to local and regional archives, including but not limited to, the San Francisco Public Library History Room, the California Historical Society and the Northwest Information Center at Sonoma State University in Rohnert Park.

- (2) Install a plaque at the front of the building to communicate its historic significance. In addition, the sidewalk around Hooper's South End Grain Warehouse makes indications about the historic location of the shoreline, which once passed underneath the corner of the building. The existing pavement does not continue those lines to the edge of the building. When relaying concrete around the building, continue the historic lines up to the edge of the building.

Mitigation measures HM-1 to HM-5 would reduce the project's impact from hazards and hazardous materials to a less than significant level.

Mitigation Measure HM-1: All contaminated soils designated as hazardous waste shall be excavated by a qualified Removal Contractor and disposed of at a regulated Class I hazardous waste landfill in accordance with EPA regulations, as stipulated in the Site Mitigation Plan. The Removal Contractor shall obtain, complete, and sign hazardous waste manifests to accompany the soils to the disposal site. Other excavated soils shall be disposed of in an appropriate landfill, as governed by applicable laws and regulations, or other appropriate actions shall be taken in coordination with the San Francisco Department of Public Health ("DPH").

A Site Health and Safety ("H&S") Plan would be required by the California Division of Occupational Safety and Health ("Cal-OSHA") prior to initiating any earth-moving activities at the site. The H&S Plan shall identify protocols for managing soils during construction to minimize worker and public exposure to contaminated soils. The protocols shall include at a minimum:

- Sweeping of adjacent public streets daily (with water sweepers) if any visible soil material is carried onto the streets.
- Characterization of excavated native soils proposed for use on site prior to placement to confirm that the soil meets appropriate standards.
- The dust controls specified in Air Quality Mitigation Measure AQ-1.
- Protocols for managing stockpiled and excavated soils.

The H&S Plan shall identify site access controls to be implemented from the time of surface disruption through the completion of earthwork construction. The protocols shall include as a minimum:

- Appropriate site security to prevent unauthorized pedestrian/vehicular entry, such as fencing or other barrier or sufficient height and structural integrity to prevent entry and based upon the degree of control required.
- Posting of “no trespassing” signs.
- Providing on-site meetings with construction workers to inform them about security measures and reporting/contingency procedures.

If groundwater contamination is identified, the H&S Plan shall identify protocols for managing groundwater during construction to minimize worker and public exposure to contaminated groundwater. The protocols shall include procedures to prevent unacceptable migration of contamination from defined plumes during dewatering.

The H&S Plan shall include a requirement that construction personnel be trained to recognize potential hazards associated with underground features that could contain hazardous substances, previously unidentified contamination, or buried hazardous debris. Excavation personnel shall also be required to wash hands and face before eating, smoking, and drinking.

The H&S Plan shall include procedures for implementing a contingency plan, including appropriate notification and control procedures, in the event unanticipated subsurface hazards are discovered during construction. Control procedures could include, but would not be limited to, investigation and removal of underground storage tanks or other hazards.

Mitigation Measure HM-2: All trucks and excavation and soil handling equipment shall be decontaminated following use and prior to removal from the site. Gross contamination shall be first removed through brushing, wiping, or dry brooming. The vehicle or equipment shall then be washed clean (including tires). Prior to removal from the work site, all vehicles and equipment shall be inspected to ensure that contamination has been removed.

Mitigation Measure HM-3: The following procedures shall be observed when handling, hauling, and disposing of contaminated soils:

- (a) Specific work practices: The construction contractor shall be alert for the presence of hazardous soils during excavation and other construction activities on the site (detected through soil odor, color, and texture and results of on-site soil testing), and shall be prepared to handle, profile (i.e., characterize), and dispose of such soils appropriately (i.e., as dictated by local, State, and federal regulations) when such soils are encountered on the site. If there are excavated materials containing over one percent friable asbestos, they would be treated as hazardous

waste, and would be transported and disposed of in accordance with applicable State and federal regulations. These procedures are intended to mitigate any potential health risks related to chrysotile asbestos, which may or may not be located on the site.

- (b) Dust suppression: Soils exposed during excavation for site preparation and project construction activities shall be kept moist throughout the time they are exposed, both during and after work hours.
- (c) Air monitoring: Air monitoring of ambient air and, as necessary, for worker exposure, shall be performed to ensure compliance with all federal, State, and local regulations and exposure requirements.
- (c) Surface water runoff control: Where soils are stockpiled, visqueen shall be used to create an impermeable liner, both beneath and on top of the soils, with a berm to contain any potential surface water runoff from the soil stockpiles during inclement weather.
- (d) Soils replacement: If necessary, clean fill or other suitable material(s) shall be used to bring portions of the project site, where contaminated soils have been excavated and removed, up to construction grade.
- (e) Hauling and disposal: Contaminated soils shall be hauled off the project site by waste hauling trucks appropriately certified with the State of California and adequately covered to prevent dispersion of the soils during transit, and shall be disposed of at a permitted hazardous waste disposal facility registered with the State of California.

Mitigation Measure HM-4: After excavation and foundation construction activities are completed, the project sponsor shall prepare and submit a Closure/Certification Report to DPH for review and approval. The Closure/Certification Report shall include the mitigation measures in the SMP for handling and removing contaminated soils from the project site, whether the construction contractor modified any of these mitigation measures, and how and why the construction contractor modified those mitigation measures.

Mitigation Measure HM-5: If excavation work at the exterior of the project building is planned, such as for utility trenches, additional sampling of soils at these exterior locations shall be performed, as directed by DPH.

Appendix B

Transportation Definitions

Source: *72 Townsend Street Transportation Study, Revised Final Report*, LCW Consulting, April 3, 2006

Roadway Classifications

The San Francisco Planning Department has developed a street hierarchy system for the City and County of San Francisco, in which the function and design of each street are consistent with the character and use of adjacent land. The major classifications in the Vehicle Circulation Plan of the San Francisco *General Plan* are:

- **Freeways:** Limited access, very high capacity facilities; primary function is to carry intercity traffic; they may, as a result of route location, also serve the secondary function of providing for travel between distant sections in the city.
- **Major Arterials:** Cross-town thoroughfares whose primary function is to link districts within the city and to distribute traffic from and to the freeways; these are routes generally of citywide significance; of varying capacity depending on the travel demand for the specific direction and adjacent land uses.
- **Transit Conflict Streets:** Street with a primary transit function, which are not classified as major arterials but experience significant conflicts with automobile traffic.
- **Secondary Arterials:** Primarily intra-district routes of varying capacity serving as collectors for the major thoroughfares; in some cases supplemental to the major arterial system.
- **Recreational Streets:** A special category of street whose major function is to provide for slow pleasure drives and cyclist and pedestrian use; more highly valued for recreational use than for traffic movement. The order of priority for these streets should be to accommodate: 1) pedestrians, hiking trails or wilderness routes, as appropriate; 2) cyclists; 3) equestrians; 4) automobile scenic driving. This should be slow and consistent with the topography and nature of the area.
- **Collector Streets:** Relatively low-capacity streets serving local distribution functions primarily in large, low-density areas, connecting to major and secondary arterials.
- **Local Streets:** All other streets intended for access to abutting residential and other land uses, rather than for through traffic: generally of lowest capacity.

In addition to the San Francisco Planning Department's roadway classifications, the freeways, major arterials, and transit conflict streets are included in the Congestion Management Program ("CMP") network and Metropolitan Transportation System ("MTS") network (see below).

Transit Preferential Streets

The Transit Preferential Street network classification system takes into consideration all transportation functions, and identifies the major transit routes where general traffic should be routed away from. There are two classifications of transit preferential streets: Primary Transit Streets, which are either transit-oriented or transit-important; and Secondary Transit Streets.

- **Primary Transit Street – Transit-Oriented:** Not major arterials, with either high transit ridership, high frequency of service, or surface rail. Along these streets, the emphasis should be on moving transit vehicles, and impacts on automobile traffic should be of secondary concern.
- **Primary Transit Street – Transit-Important:** Major arterials, with either high transit ridership, high frequency of service, or surface rail. Along these streets, the goal is to improve the balance between modes of transportation, and the emphasis should be on moving people and goods, rather than on moving vehicles.
- **Secondary Transit Street:** Medium transit ridership and low-to-medium frequency of service, or medium frequency of service and low-to-medium transit ridership, or connects two or more major destinations.

In general, it is City policy that transit preferential treatments should be concentrated on the most important transit streets, and the treatments applied should respond to all transportation needs of the street. For example, on streets that are major arterials for transit and not for automobile traffic, treatments should emphasize transit priority; on streets that are major arterials for both transit and automobiles, treatments should emphasize a balance between the modes. It is also City policy that automobile facility features (such as driveways and loading docks) should be reduced, relocated or prohibited on transit preferential streets in order to avoid traffic conflicts and automobile congestion.

Citywide Pedestrian Network

The Citywide Pedestrian Network is a classification of streets throughout the City used to identify streets devoted to or primarily oriented to pedestrian use. The main classifications are:

- **Citywide Pedestrian Network Street:** An inter-neighborhood connection with “citywide significance” includes both exclusive pedestrian and pedestrian-oriented vehicular streets. These streets include the Bay, Ridge and Coast trails, are used by commuters, tourists and the general public, and connect major institutions with transit facilities.
- **Neighborhood Network Street:** A neighborhood commercial, residential or transit street that serves pedestrians from the general vicinity. Some streets may be part of the Citywide network, but are generally oriented towards neighborhood-serving uses. Types include exclusive pedestrian and pedestrian-oriented vehicular streets. As part of the Neighborhood Network Street network, streets are classified as **Neighborhood Commercial Streets**, which are streets that are predominantly commercial use with parking and loading conflicts, or **Neighborhood Network Commercial Streets**, which are intra-neighborhood connection streets that connect neighborhood destinations.

In general, it is City policy that sufficient pedestrian movement space should be provided to minimize pedestrian congestion, sidewalks should be widened where intensive commercial, recreational or institutional activity is present, and efforts should be made to ensure convenient and safe pedestrian crossings at intersections.

Congestion Management Program Network

The CMP network is a network of freeways, state highways, major arterials and transit conflict streets (see Roadway Classifications, above) established in accordance with state Congestion Management legislation. As part of the CMP, the San Francisco County Transportation Authority is required to determine the level of service (“LOS”) for the CMP network streets every two years. The LOS is based on the average travel speed for each roadway segment during both the AM and PM peak periods. The level of service standard is LOS E, except for roadway segments that operated at LOS F in 1991 (when the first study was performed). The CMP requires development of “Deficiency Plans” for any CMP-designated roadway that operates at LOS F. These plans include an analysis of the causes of the deficiency, a list of improvements that would have to be made to prevent the deficiency from occurring (including cost estimates), a list of improvements proposed as part of the plan, and an action plan for implementation of the improvements (including an implementation schedule).

The following are the most-recently determined travel speeds and levels of service for the CMP network streets in the vicinity of the project area for the weekday PM peak period (generally 4:00 to 6:00 PM). For the other CMP network roadway segments in the vicinity of the project site, no travel speed or level of service information is provided.

Roadway Performance - Weekday PM Peak Period				
Roadway Segment	Direction	Travel Speed	LOS	Year Reported
I-80 - US 101 to Fremont	E	10.0	F	2004
I-80 - Fremont to Treasure Island	E	14.6	F	2004
I-80 - Treasure Island to Fremont	W	21.7	F	2004
I-80 - Fremont to US 101	W	13.8	F	2004

Metropolitan Transportation System Network

The MTS network is defined by the Metropolitan Transportation Commission (“MTC”) as part of its Regional Transportation Plan. The MTS is a regional network of roadways, transit corridors and transfer points, identified by the MTC in the basis of specific criteria. The criteria identified facilities that provide relief to congested corridors, improve connectivity, accommodate travel demand and serve a regional transportation function. The State highways and major thoroughfares designated in San Francisco’s CMP roadway network are all included in the regional MTS network. There are few instances in which the local CMP network is not identical to the MTS network due to differences in the criteria used to define each network.

